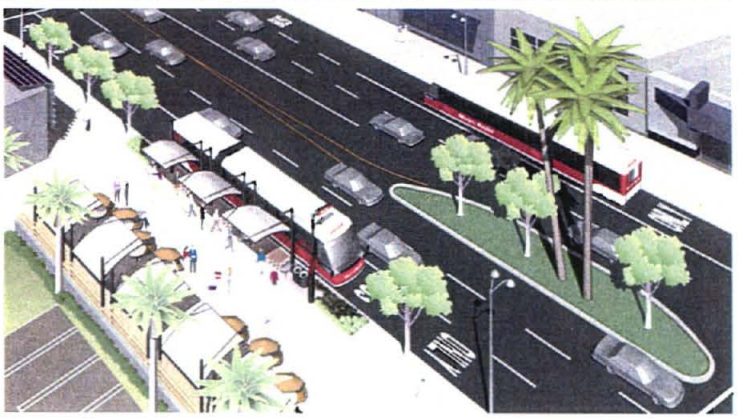
Wilshire Bus Rapid Transit Project

Final Environmental Impact Report







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MID-CITY/WESTSIDE TRANSIT CORRIDOR WILSHIRE BUS RAPID TRANSIT PROJECT

Final Environmental Impact Report (EIR)
State Clearinghouse No. 2000051058
Volume I

Prepared for
Los Angeles County Metropolitan Transportation Authority

Prepared by
EIP Associates
Terry A. Hayes & Associates
Korve Engineering
Meyer, Mohaddes Associates
Manuel Padron Associates
The Robert Group
Consensus Planning Group

In Association with
Suisman Urban Design
Greenwood and Associates
Hatch Mott MacDonald
Harris Miller Miller & Hanson, Inc.
Wagner Engineering & Survey, Inc.
W. Koo & Associates, Inc.

August 1, 2002

CONTENTS

VOLUME I

EXECUTIVE SUMMARY

S-1 Final EIR—Purpose and Intended Uses ES-1
S-2 Environmental Process ES-2
S-3 Resolution of Issues ES-4
S-4 Basis for the Project: Building on the Successes of Metro Rapid Bus ES-6
S-5 The Proposed Wilshire BRT Project: The Locally Preferred Alternative (LPA) ES-8
S-6 Final EIR Alternatives ES-24
S-7 Ridership Forecasts ES-24
S-8 Capital Cost Estimate ES-26
S-9 Bus Transit Speeds and Reductions in Travel Time ES-26
S-10 Environmental Evaluation ES-29
S-11 Mitigation Measures ES-37
Summary of Stations ES-39

1.0 HISTORY/PURPOSE AND NEED 1-1
1.1 Introduction 1-1
1.2 Background and History 1-1
1.2.1 Mid-City/Westside Studies 1-1
1.2.2 Additional Mid-City/Westside Studies 1-3
1.3 Purpose and Need for the Project 1-4
1.3.1 The Mid-City/Westside Study Area Location and Demographics 1-5
1.3.2 Major Themes Supporting Transit Need in the Study Area 1-7
1.4 Alternatives Screening Process 1-21
1.4.1 Alternatives Screening Methodology 1-22
1.4.2 Summary of Screening Results 1-23

2.0 LOCALLY PREFERRED ALTERNATIVE 2-1
2.1 Introduction 2-1
2.2 Bus Rapid Transit and Metro Rapid Bus 2-1
2.3 What Was Considered in Draft EIS/EIR 2-2
2.4 Description of the Locally Preferred Alternative (LPA) 2-6
2.4.1 BRT Project Elements 2-6
2.4.2 BRT Service Characteristics 2-9
2.4.3 BRT Stations 2-12
2.4.4 BRT Parking Facilities 2-21
2.4.5 BRT Maintenance and Storage Facilities 2-24
2.5 Other Final EIS/EIR Alternatives 2-29
2.5.1 No Action Alternative (Baseline) 2-29
2.5.2 Transportation System Management (TSM) Alternative 2-30
2.6 Capital Cost Estimate 2-30
2.7 Ridership Forecasts 2-31
2.8 Benefits: Improvements in Bus Transit Speeds and Reductions in Travel Time 2-32

2.9 Project Implementation Approach 2-36

3.0 ENVIRONMENTAL ANALYSIS 2.9-1

3.1 Introduction to the Environmental Analysis 3.1-1
3.1.1 Introduction 3.1-1
3.1.2 Contents of Environmental Analysis 3.1-1
3.1.3 Assessment Methodology 3.1-1
3.1.4 Analysis of Project Elements 3.1-3

3.2 Traffic and Circulation 3.2-1
3.2.1 Setting 3.2-1
3.2.2 Transit Service 3.2-4
3.2.3 Project Impacts 3.2-4
3.2.4 Mitigation Measures 3.2-9

3.3 Parking 3.3-1
3.3.1 Introduction 3.3-1
3.3.2 Affected Environment 3.3-1
3.3.3 Impact Assessment 3.3-3
3.3.4 Mitigation Measures 3.3-6
3.3.5 Cumulative Impacts 3.3-6

3.4 Land Acquisition/Displacement and Relocation 3.4-1
3.4.1 Introduction 3.4-1
3.4.2 Affected Environment 3.4-1
3.4.3 Impact Assessment 3.4-1
3.4.4 Impacts 3.4-1
3.4.5 Mitigation 3.4-2
3.4.6 Cumulative Impacts 3.4-2

3.5 Visual Quality 3.5-1
3.5.1 Introduction 3.5-1
3.5.2 Impact Assessment and Mitigation Measures 3.5-7
3.5.3 Impacts 3.5-7
3.5.4 Mitigation 3.5-9
3.5.5 Cumulative Impacts 3.5-10

3.6 Geology, Soils, and Seismicity 3.6-1
3.6.1 Introduction 3.6-1
3.6.2 Affected Environment 3.6-1
3.6.3 Impact Assessment and Mitigation Measures 3.6-6
3.6.4 Parking Facilities 3.6-7
3.6.5 Cumulative Impacts 3.6-7

3.7 Safety and Security 3.7-1
3.7.1 Introduction 3.7-1
3.7.2 Affected Environment 3.7-1
3.7.3 Impact Assessment and Mitigation Measures 3.7-3
3.7.4 Mitigation 3.7-5
3.7.5 Cumulative Impacts 3.7-5

3.8 Construction Impacts 3.8-1
3.8.1 Construction Methods 3.8-1
3.8.2 Standards of Significance 3.8-3
3.8.3 Construction Impacts 3.8-4
3.8.4 Mitigation Measures 3.8-15

4.0 EFFECTS DETERMINED NOT TO BE SIGNIFICANT AND OTHER CEQA AND NEPA CONSIDERATIONS 4-1
4.1 Introduction 4-1
4.2 Long-Term Implications 4-1
4.2.1 Significant Environmental Effects Which Cannot Be Avoided If the Proposed Project Is Implemented 4-1
4.2.2 Summary of Significant Cumulative Impacts 4-2
4.2.3 Growth-Inducing Impacts 4-4
4.2.4 Irreversible and Irretrievable Commitment of Resources 4-4
4.3 Effects Determined Not to Be Significant 4-5
4.3.1 Introduction 4-5
4.3.2 Socioeconomics 4-6
4.3.3 Land Use/Neighborhoods 4-7
4.3.4 Air Quality—Operations 4-7
4.3.5 Noise and Vibration 4-8
4.3.6 Water Resources 4-8
4.3.7 Biological Resources 4-8
4.3.8 Energy Resources 4-9
4.3.9 Community Facilities 4-9
4.3.10 Hazards 4-9
4.3.11 Cultural Resources 4-9
4.4 Executive Order Pertaining to Floodplains 4-10
4.4.1 Impacts 4-10
4.5 Executive Order Pertaining to Wetlands 4-11
4.5.1 Impacts 4-11
4.6 Executive Order Pertaining to Endangered Species 4-11
4.6.1 Impacts 4-11
4.7 Executive Order Pertaining to Environmental Justice 4-11
4.7.1 Wilshire Corridor 4-12
4.7.2 Impacts 4-13
4.8 National Historic Preservation Act 4-15
4.9 Section 4(f) 4-16
4.9.1 Impacts to Parklands 4-17
4.9.2 Impacts to Cultural Resources 4-17

5.0 COMMUNITY PARTICIPATION 5-1
5.1 Introduction 5-1
5.1.1 Background 5-1
5.1.2 Objectives 5-1
5.2 Public Involvement and Environmental Review Process 5-1
5.2.1 Notice of Intent/Notice of Preparation (NOI/NOP) 5-1
5.2.2 Activities 5-2
5.3 Summary of the EIR Scoping Process 5-7
5.3.1 Public Scoping Meetings 5-7
5.3.2 Outreach Meetings 5-7
5.3.3 Summary of Scoping Comments 5-8
5.3.4 Agency Coordination 5-8
5.4 Public Review of the Environmental Document 5-9
5.4.1 Public Hearings on the Draft EIS/EIR 5-9
5.4.2 Noticing for the Draft EIS/EIR 5-10

5.4.3 Summary of Comments on the Draft EIR 5-11
5.5 MTA Board Adopion of Locally Preferred Alternative 5-12
5.5.1 Environmental Process 5-12
5.5.2 Resolution of Issues 5-13
5.6 Agency Outreach in Support of Final EIR 5-16
5.7 Release and Certification of Final EIR 5-16

6.0 REFERENCES 6-1
6.1 General References 6-1
6.2 Cultural Resource References 6-3
6.3 Historical Maps 6-9
6.4 Supporting Technical Documents 6-10

7.0 LIST OF PREPARERS 7-1

8.0 DISTRIBUTION LIST 8-1
8.1 Federal Agencies 8-1
8.2 State Agencies 8-1
8.3 Regional Agencies 8-2
8.4 Local Agencies 8-2
8.4.1 Los Angeles County 8-2
8.4.2 City of Beverly Hills 8-2
8.4.3 City of Culver City 8-2
8.4.4 City of Santa Monica 8-2
8.4.5 City of Los Angeles 8-2
8.5 Public Libraries 8-3

9.0 RESPONSES TO COMMENTS ON THE DRAFT EIR 9-1
9.1 Changes in the Project Description Since Release of the Draft EIR 9-1
9.2 Public Review Process 9-1
9.3 Contents and Organization of the Final EIR 9-3
9.4 Statutory Requirements 9-3
9.4.1 CEQA 9-3
9.5 Use of the Final EIR 9-4
9.5.1 CEQA Requirements 9-4
9.6 Responses to Written Public Comments 9-4
9.6.1 Topical Responses 9-5
9.6.2 Individual Responses 9-14
9.6.3 Public Testimony 9-104
9.6.4 Petitions 9-108

APPENDICES
Appendix A List of Persons, Organizations, and Public Commenting in the Draft EIS/EIR for the Mid-City/Westside Transit Corridor Project
Appendix B Comprehensive List of Comments and Type of Response Provided
Appendix C Wilshire Boulevard Through-Traffic
Appendix D Mitigation Monitoring and Reporting Program and Construction Mitigation Plan

VOLUME II—ENGINEERING DRAWINGS

TABLES

Table 1-1	Mid-City/Westside RTP Performance Indicators	1-7
Table 1-2	Summary of Mode Choice Along Wilshire and Expo Routes	1-12
Table 1-3	Population & Employment Forecast	1-13
Table 1-4	Summary of Person Travel Characteristics—Mid-City/Westside Study Area	1-17
Table 1-5	Traffic Volume Trends on Santa Monica Freeway	1-19
Table 2-1	Key BRT Features	2-2
Table 2-2	LPA Components by Neighborhood	2-9
Table 2-3	Wilshire BRT LPA Operating Characteristics	2-12
Table 2-4	No Action (Baseline) Operating Characteristics	2-29
Table 2-5	Transportation System Management (TSM) Operating Characteristics	2-30
Table 2-6	Wilshire Bus Rapid Transit Project Summary of Costs	2-31
Table 2-7	Ridership in Forecast Year 2020	2-32
Table 2-8	Comparison of Daily Boardings (Route 720)	2-32
Table 3.3-1	Wilshire Boulevard BRT Corridor Existing Parking by City and Segment	3.3-1
Table 3.3-2	Parking Utilization on Wilshire Boulevard in West Los Angeles	3.3-4
Table 3.5-1	Corridor Visual Characteristics	3.5-5
Table 3.7-1	Part I Crime Rate and Response Time (Year 1999)	3.7-1
Table 3.8-1	Daily Construction Emissions (pounds per day) Wilshire BRT	3.8-7
Table 3.8-2	Sites on CORTESE List within Wilshire Route	3.8-8
Table 3.8-3	Daily Construction Emissions (pounds per day) Maintenance Yard	3.8-10
Table 3.8-4	Daily Construction Emissions (pounds per day) Parking Facilities	3.8-14
Table 4-1	Ethnic Breakdown Within 0.5 Mile of the Wilshire BRT and Region	4-12
Table 4-2	Ethnic Breakdown Within 0.5 Mile of the Wilshire BRT Stations	4-13
Table 4-3	Percentage of Minority and Low-Income Populations, Wilshire Corridor	4-14
Table 4-4	Parkland and Recreational Sites, Wilshire Corridor	4-16
Table 5-2	List of Organizations Contacted	5-5
Table 5-3	Mid-City/Westside Corridor EIR Scoping Meetings	5-7
Table 7-1	List of Document Preparers	7-1

FIGURES

Figure 1-1	MTA System Map with Expansion Study Areas	1-6
Figure 1-2	Los Angeles Centers Concept	1-9
Figure 1-3	Transit Supporting Land Use	1-11
Figure 2-1	The Metro Rapid Program	2-3
Figure 2-2	Existing Metro Rapid Routes	2-4
Figure 2-3	Draft EIS/EIR Wilshire BRT Alternatives Considered	2-5
Figure 2-4	Wilshire Bus Rapid Transit (BRT) Project	2-7
Figure 2-5	Wilshire BRT Typical Cross-Section and Station	2-8
Figure 2-6	Typical Busway Signs	2-10
Figure 2-7	Typical Bus Only Lane Signage	2-11
Figure 2-8	BRT Vehicles	2-13
Figure 2-9	Western & Crenshaw Stations	2-14
Figure 2-10	La Brea & Fairfax Stations	2-15
Figure 2-11	La Cienega & Robertson Stations	2-16
Figure 2-12	Beverly & Santa Monica Stations	2-17
Figure 2-13	Westwood & VA Hospital Stations	2-18
Figure 2-14	Barrington & Bundy Stations	2-19
Figure 2-15	14th & 4th Stations	2-20
Figure 2-16	Wilshire/Crenshaw Community Parking Facility	2-22
Figure 2-17	Wilshire/La Brea Community Parking Facility	2-23
Figure 2-18	Location of Proposed Bus Maintenance Facility	2-25
Figure 2-19	Photograph of Proposed Bus Maintenance Facility Site	2-26
Figure 2-20	Proposed Bus Maintenance Facility—Lower Level	2-27
Figure 2-21	Proposed Bus Maintenance Facility—Upper Level	2-28
Figure 2-22	Wilshire BRT Travel Time: Wilshire/Western to Santa Monica Pier with BRT Project Elements	2-33
Figure 2-23	Existing Wilshire Boulevard Average Peak Period Bus Speed by Segments	2-35
Figure 2-24	Wilshire BRT Demonstration No. 1	2-40
Figure 3.2-1	Existing Volumes on Wilshire Boulevard at Study Intersections	3.2-2
Figure 3.2-2	1998 Existing A.M. Peak Hour Arterial Segments with LOS E or F	3.2-3
Figure 3.2-3	2020 No Action P.M. Peak Hour Arterial Segments with LOS E of F	3.2-5
Figure 3.2-4	A.M. Peak Hour Impacted Arterial Segments Alternative 1	3.2-7
Figure 3.2-5	Daily Person-Carrying Capacity of Wilshire Boulevard	3.2-8
Figure 3.5-1	Street-Level Views of the Wilshire Corridor (Park Mile and Hancock Park)	3.5-2
Figure 3.5-2	Street-Level Views of the Wilshire Corridor (Beverly Hills & Westwood)	3.5-3
Figure 3.5-3	Street-Level Views of the Wilshire Corridor (Santa Monica)	3.5-4
Figure 3.6-1	Active Fault Zones	3.6-2
Figure 3.6-2	Alquist-Priolo Earthquake Fault Zones	3.6-3
Figure 3.6-3	Potential Liquefaction Areas	3.6-4
Figure 3.6-4	Methane Hazard Zone	3.6-5
Figure 3.7-1	Police Service Areas	3.7-2
Figure 5-1	Community Meeting Advertisements	5-6

MID-CITY/WESTSIDE TRANSIT CORRIDOR

Wilshire Bus Rapid Transit Project

Final Environmental Impact Report

Executive Summary

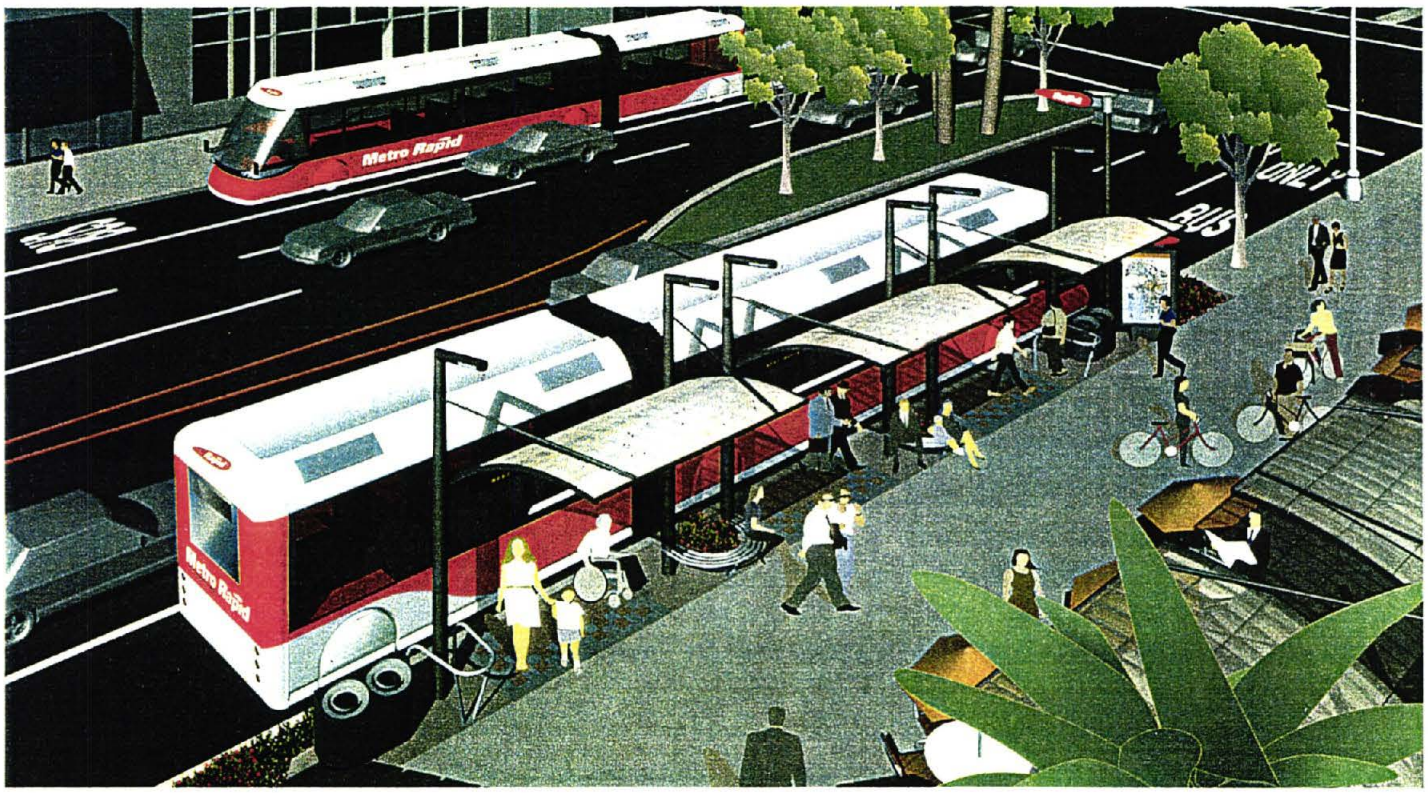
S-1 Final EIR- Purpose and Intended Uses

This Final Environmental Impact Report (Final EIR) has been prepared under the requirements of the California Environmental Quality Act (CEQA) to describe the environmental setting and consequences of the construction and operation of the Wilshire Bus Rapid Transit (BRT) Project to the public and involved local and state agencies. The report also identifies and evaluates alternatives, and proposes mitigation measures to reduce potentially significant environmental impacts. The Los Angeles County Metropolitan Transportation Authority (MTA) is the lead agency for compliance with CEQA.

This Final EIR does not make recommendations regarding the approval or denial of the project.

An EIR is an informational document which will inform public agency decision-makers and the public of the significant environmental effect of a project, identify possible ways to minimize the significant effects, and describe reasonable alternatives. The MTA Board of Directors will consider the information in the EIR along with other information, which may be presented to the agency, prior to the adoption of the project. Other agencies, such as the California Department of Transportation (Caltrans), the cities of Los Angeles, Beverly Hills, Santa Monica, and the County of Los Angeles will also have roles in reviewing and approving the project.

View of Wilshire Boulevard depicting the higher capacity transit vehicles, enhanced station areas, repaired curb lanes and potential peak period transit lanes. Peak period transit lane would only be implemented if supported by the local jurisdiction.



INTRODUCTION

TABLE OF CONTENTS

VOLUME ONE
Executive Summary

1.0 - History/Purpose and Need
2.0 - Locally Preferred Alternative
3.0 - Environmental Analysis
4.0 - Effects Determined Not to Be Significant and Other CEQA Considerations
5.0 - Community Participation
6.0 - References
7.0 - List of Preparers
8.0 - Distribution List
9.0 - Responsed to Comments

VOLUME TWO

Engineering Design

For more information contact:
Mr. David Mieger
Los Angeles County Metropolitan
Transportation Authority
One Gateway Plaza, MS 99-22-5
Los Angeles, CA 90012
E-mail- MidCityWestside@mta.net
Project Hotline 310-366-6443

S-2 Environmental Process

Compliance with CEQA must be achieved before the proposed project can be approved. The goal of this legislative act is to ensure that local decision-makers are aware of the environmental consequences of a decision before it is made.

An extensive environmental review process has been conducted to date (the process completed prior to this Final EIR involved both federal and state environmental processes, therefore, some references below will include activities that were compliant with NEPA). Included in this process are the following:

Notice of Preparation (NOP)–A notice of preparation of an EIR was prepared by MTA and circulated by the State of California EIR Clearinghouse on May 8, 2000.

Notice of Intent (NOI) – A notice of intent to prepare an EIS was published in the Federal Register on May 19, 2000 (Vol. 65, No. 98). The NOI provided a brief description of the proposed project and invited comment on issues that would be addressed in the environmental document.

Public Scoping Workshops - To invite public comment about the project, six workshops were held between May 23 and June 8, 2000, which were attended by more than 380 persons. Letters of invitation were mailed to over 12,000 addresses along the Wilshire and Exposition alignments. The 30-day public scoping comment period extended through June 23, 2000, and all comments received about the project were documented and reviewed as a part of the preparation of the Draft EIS/EIR. Additionally, MTA staff attended more than 42 community meetings with business, civic and homeowners associations during the scoping period and subsequent preparation of the Draft EIS/EIR. Results of this public outreach were presented to the MTA Board of Directors in February 2000.

Public Comment Period – Following the release of the Draft EIS/EIR, a public comment period was held which extended from April 6, 2001 through June 15, 2001. The draft document was placed in public libraries and other repository sites as an effective way of providing ongoing information about the project. The document was also available on the MTA website (www.mta.net) and information about public hearings and other ongoing project activities was available via the project telephone line (310-366-6443). Public hearings were held on May 7, May 9, and May 15, 2001 to receive oral and written testimony on the Draft EIS/EIR from the general public. A total of more than 600 persons attended these hearings. The MTA provided notice of these public involvement meetings in compliance with CEQA and NEPA. For a detailed description of the environmental review process, and project-related public involvement opportunities, refer to the Community Participation section of the Final EIR.

Responses to Comments - Responses and to all comments on the Draft EIS/EIR were compiled subsequent to the public comment period and incorporated into the Final EIR. Please refer to the full Final EIR for a full presentation of comments and responses.

MTA Board Actions - The MTA Board took action on June 28, 2001 on several elements of the project. First,



Aerial view of Wilshire Boulevard, the "backbone of Los Angeles", a 17- mile commercial and residential spine looking east from Beverly Hills (center foreground), Miracle Mile, Wilshire Center and Downtown Los Angeles (background).

the Board adopted separate Locally Preferred Alternatives (LPAs) for the Wilshire Bus Rapid Transit (BRT) Route and for the Exposition Light Rail Transit (LRT) Route. The Board also gave the directive that the Exposition LRT Route be addressed in a separate environmental document to be released following completion of preliminary engineering design and studies for that specific transit route. Therefore, the LPA described in this Final EIR focuses on the implementation of a BRT Project along the Wilshire BRT Route only.

The Board also directed staff to consider a curb-lane BRT operation. The Wilshire BRT median and median-adjacent alternatives were eliminated from further consideration due to the significant impacts associated with them and the issues raised during the public comment period regarding these impacts. The Curb-Lane LPA for the Wilshire BRT Route significantly reduces these impacts. In particular, there are no longer any significant impacts associated with the removal of landscaped medians, the removal of on-street parking, or the impact to left-turns.

The MTA Board further specified that any dedicated bus lanes should not be implemented as a component of the project unless approved by the local City or County jurisdiction. To date, no such approvals have been granted, however, MTA staff will continue to work with each city to determine possible segments of the route where such lanes may be feasible. Peak period, dedicated bus lanes would initially be tested on a demonstration basis in the

AM peak (7:00 am to 9:00am), prior to the opening of most stores and businesses. If successful after such trials, the program would be considered in the PM period (4:00 pm to 7:00 pm), and along additional segments of Wilshire Boulevard.

The project cannot be implemented until the Final EIR is certified with all necessary mitigation measures and an adopted Mitigation Monitoring Program. Following certification of the EIR by the MTA Board, the State Clearinghouse will consider the Final EIR and a Notice of Completion (NOC) will be filed for the project.



Over 600 people attended the Mid-City Westside project hearings in May 2001.

S-3 Resolution of Issues

The MTA Board took the actions described above after consideration of the areas of controversy and issues raised by the public and identified in the Draft EIS/EIR. The issues of concern identified by public comments to the Draft EIS/EIR included: the conversion of two mixed flow traffic lanes to 24-hour dedicated bus lanes; the removal and reconstruction of existing landscaped medians; the removal of on-street parking in Los Angeles and Beverly Hills; the removal of on-street parking in Santa Monica; the removal of left turn pockets; and possible street widening. Each of these issues are discussed below.

Issue #1: Landscaped Median Islands

Business leaders in the Wilshire Center, Miracle Mile, and Beverly Hills areas of the Corridor were concerned that the median-running BRT alternative would require the removal and reconstruction of the landscaped medians in the middle of Wilshire Boulevard.

Resolution: The MTA Board, by adopting the curb-lane BRT project, acknowledged this issue and selected an alternative that would not require the removal and/or reconstruction of the landscaped medians.

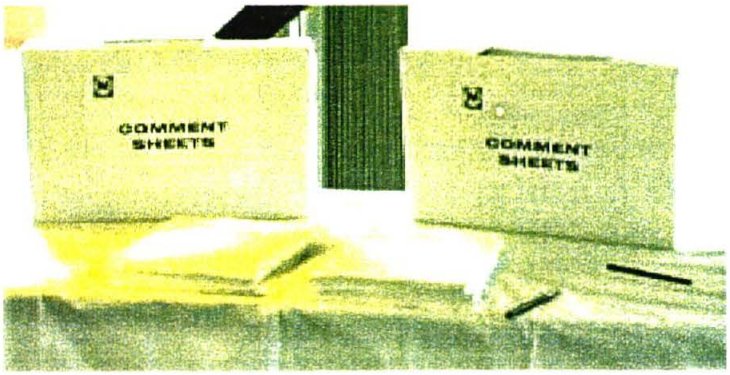
Issue #2: Removal of On-Street Parking in Los Angeles and Beverly Hills

Business and community leaders expressed opposition to the dedicated transit lanes because they would eliminate most of the on-street parking spaces along Wilshire Boulevard. These parking spaces are used by residents and businesses and were cited to be an important community asset that should not be removed.

Resolution: The MTA proposal has been revised to now only consider dedicated bus transit lanes only during peak-periods. During non-peak periods and weekends, on-street parking could remain as it is today. Parking along most segments of Wilshire Boulevard in Los Angeles and Beverly Hills is currently prohibited during peak-periods, and therefore no impact would occur in all but two locations:

- *Westwood* Residents in this community between Comstock and Selby Avenues requested that no parking be removed in this area and that dedicated transit lanes not be considered. This segment of Wilshire Boulevard is the only segment of Wilshire Boulevard in which transit buses do not experience delay due to traffic congestion and therefore no significant benefit was felt to exist from the dedicated transit lanes. Following review of transit speeds, MTA staff concurs with the residents' position and is therefore not recommending any further consideration of dedicated transit lanes in this segment of the boulevard. Buses in this area are recommended to run in mixed-flow traffic.

West Los Angeles – On-street metered parking is still allowed during AM and PM peak periods in one segment of Wilshire Boulevard in West Los Angeles between Centinela and Federal Avenues. A total of 167-metered parking spaces are located in this area, which would be removed from service during peak periods (7:00am to 9:00am and 4:00pm to 7:00pm) if a dedicated transit lane were imple-



Over 5,000 written comments were received on the Mid-City/Westside Draft EIR.

mented in the curb lane. These spaces would not be affected during off-peak and weekend periods. Because of this, MTA is proposing to test an AM-peak period operation in this area when use of the metered parking spaces is low. During the 7:00am to 9:00am period, very few businesses are open and only about 30 percent of the spaces are actually used. Sufficient metered parking exists on side streets during this time to accommodate any displaced parking.

Issue #3: Removal of On-Street Parking in Santa Monica

Community meetings in Santa Monica indicated a strong objection to the relocation of 509 on-street parking spaces in that city. In addition, the mitigation measure of operating only in the peak hours proposed to reduce impacts in LA and Beverly Hills would not eliminate the impact to parking in Santa Monica since parking is permitted on a 24-hour basis.

Resolution: In recognition that both a 24-hour and a peak-hour only BRT system would significantly impact on-street parking in Santa Monica, the project has been defined to operate only in mixed-flow configuration in the City of Santa Monica. This means that the buses would travel in the mixed traffic lanes, with other vehicles, and would not operate in the curb lane where cars are parked, except to pull in and out of stations. A total of nine parking spaces are now proposed to be relocated to provide for BRT Stations in the City of Santa Monica, instead of the 509 spaces that were previously proposed.

Issue #4: Removal of Left-Turn Pockets

The median alternative would have required vehicles to cross over the exclusive Busway lanes to turn left. Arrows and special signal phases would have been required to insure safe turns. The left turn signals, however, would have removed green time that is needed to provide signal priority for buses on Wilshire, effectively eliminating any signal priority for the buses and one of the major benefits of the proposed project. The median-adjacent alternative would have required "permissive" left-turn pockets, where vehicles would cross one direction of the bus lane prior to reaching the intersection, thereby not requiring a dedicated left-turn signal. However, the City of Los Angeles Department of Transportation (LADOT) indicated that such permissive turns would not be advisable.

Resolution: The adoption by the MTA Board of the curb-lane BRT project eliminated the need for the removal of any left-turn pockets.

Issue #5: Possible Street Widening

The median and median-adjacent alternatives would have required that certain segments of Wilshire Boulevard be widened in station areas to allow for the installation of the platforms in the median of the street.

Resolution: The adoption of the curb-lane alternative would not require street widening since the stations would be located alongside the curb and not in the median of the street.



MTA staff and consultants worked on numerous alternative suggestions provided by members of the public.

Issue #6: Dedicated Bus Lanes

Business owners, as well as representatives from the cities along the Corridor, were concerned that a 24-hour, exclusive-lane BRT project requiring the loss of two traffic lanes along Wilshire Boulevard would not only reduce the carrying capacity of the street but would also cause a redistribution of traffic to other streets.

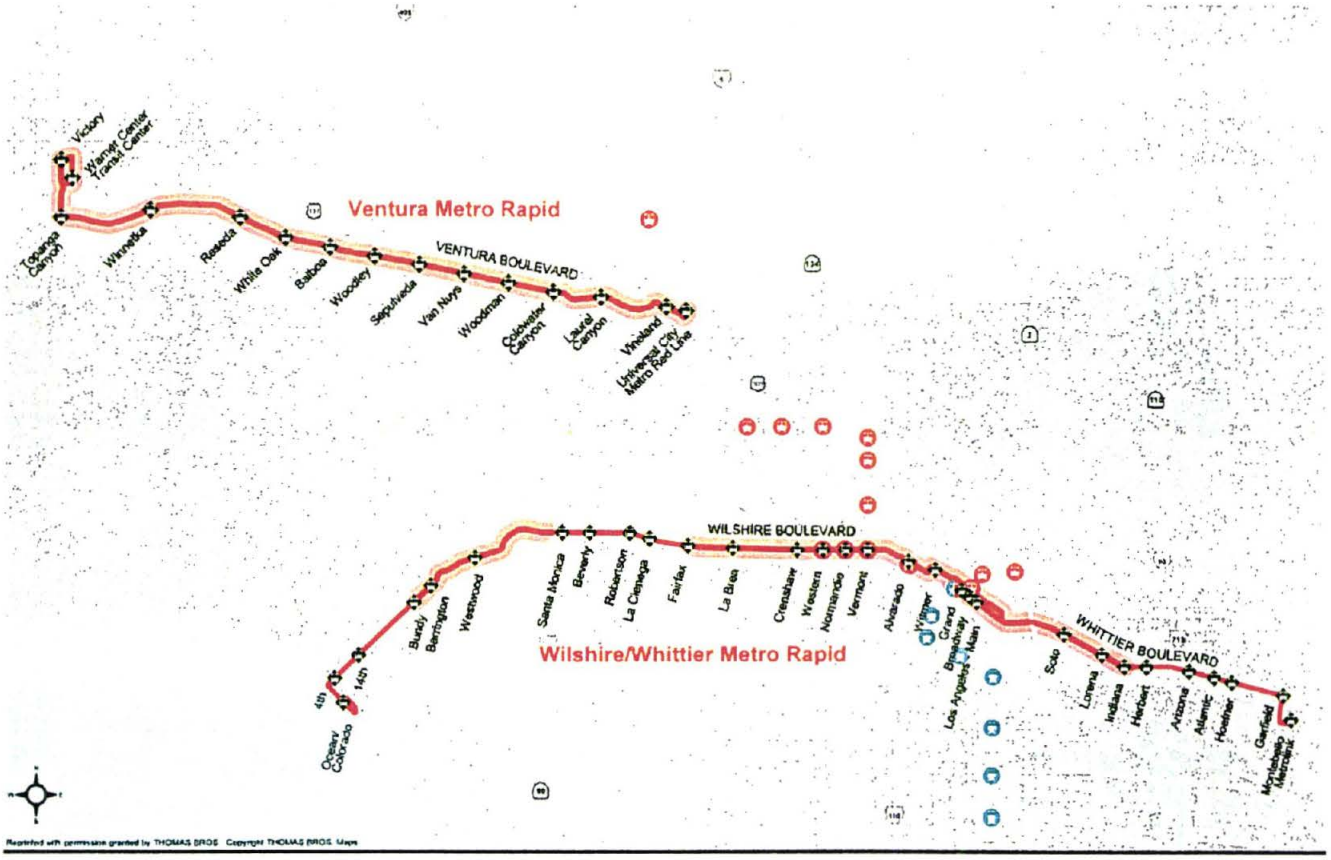
Resolution: In recognition of this concern, the MTA Board adopted the curb-lane, peak-hour only BRT alternative, subject to approval by each city and/or jurisdiction, this BRT alternative would operate in an exclusive lane, which would require the conversion of a mixed flow traffic lane in each direction to a dedicated bus lane. However, the use of this lane for transit would only occur during substantially reduced hours (five hours per day versus the original plan of 24 hours per day). An exclusive lane is not proposed in the City of Santa Monica where the project would operate in mixed flow traffic lanes. Also see previous discussion of segment between Comstock and Selby Avenues under Issue #2.

S-4 Basis for the Project: Building on the Successes of Metro Rapid Bus

Since the opening of Metro Rapid service on Wilshire Boulevard in June 2000, bus ridership is up more than 25 percent. Metro Rapid travel times have been up to 25 percent faster than local service due to several new features to the corridor including simple route layout, frequent service, limited stops, level floor bus boarding, color-coded buses and stops, enhanced station stops and signal priority developed by the Los Angeles Department of Transportation (LADOT). There are now upwards of 80,000 boardings every day along the route (Metro Lines 18, 20, 21, 22, 720), and a total of close to 100,000 boardings/day when other bus operators are included, making it one of the heaviest-used bus transit boulevards in the nation. In spite of this, many buses travel at less than eight m.p.h. in segments of the route due to heavy traffic congestion. The latent demand for faster transit service along this corridor is evident by the tremendous overcrowding along the majority of the project area route.



Current Metro Rapid buses are 40 feet long, have a low floor design for easier and faster boarding, and run on Compressed Natural Gas.



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Metro Rapid
LOS ANGELES

Demonstration Routes

Prepared by: Transportation Management & Design, Inc.

Wilshire Boulevard Metro Rapid line 720 opened in June 2000 and was adopted by the MTA Board as an official mode in March 2002. The Board subsequently adopted the implementation of 22 additional lines throughout Los Angeles County.

ADDED FEATURES FOR WILSHIRE BUS RAPID TRANSIT

KEY FEATURES	Existing Metro Rapid	Wilshire BRT Enhanced Project (LPA)
Simple Route Layout	●	●
Frequent Service	●	●
Headway-based Schedules	●	●
Less Frequent Stops	●	●
Level Boarding and Alighting	●	●
Bus Signal Priority	●	●
Next Bus Displays	●	●
Higher Capacity Vehicles		●
Multiple Door Boarding and Alighting		●
Point of Sale Fare Pre-Payment		●
Fare Payment Machines		●
Curb Lane Repair for Smoother Ride		●
Station Areas with Larger Canopies		●
Station Area Landscaping		●
Information Kiosks		●
Operations and Maintenance Facility		●
Exclusive Peak Hour Bus Lanes (segments of the route)		●

S-5 The Proposed Wilshire BRT Project: The Locally Preferred Alternative (LPA)

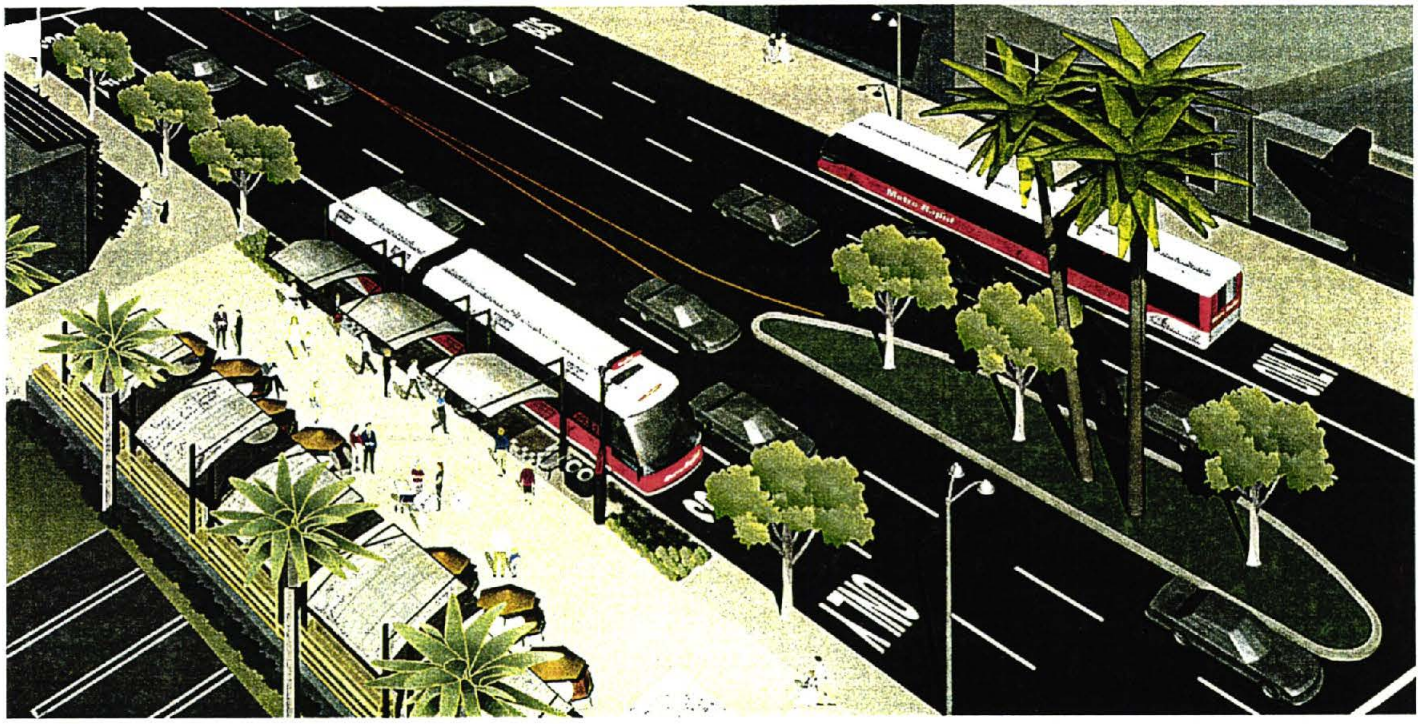
As shown below, the Wilshire portion of the MTA Wilshire/ Whittier route operates from downtown Los Angeles, along Wilshire Boulevard, traversing a portion of the Metro Red Line, from Alvarado Street and Western Avenue to Wilshire Boulevard and Ocean Avenue in Santa Monica. The LPA focuses on the western portion of the route specifically between Western Ave to the City of Santa Monica.

The Wilshire Bus Rapid Transit (BRT) project builds upon the successes of the existing Metro Rapid features by adding the following project elements that are expected to contribute greatly to the success of a mature BRT system: higher-capacity buses, multiple-door entry and exit, smartcard fare payment, exclusive lanes, and station enhancements. The map and table below provide descriptions of the existing Metro Rapid Bus Features and the proposed Wilshire BRT Enhanced Project (LPA).

The Wilshire BRT LPA is a bus rapid transit (BRT) system operating in the curb lane along the north and south sides of Wilshire Boulevard, from Western Avenue to the City of Santa Monica.

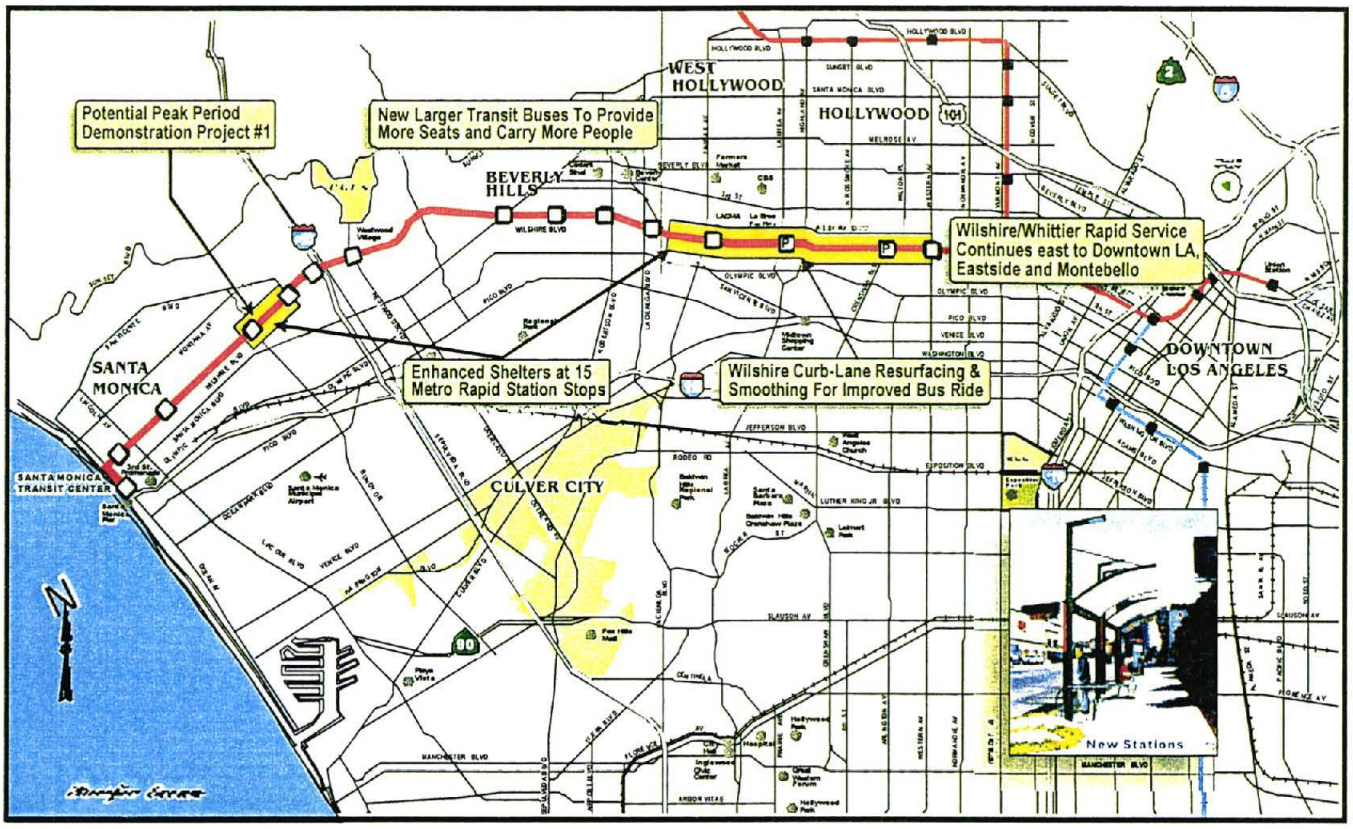
The Wilshire BRT LPA is intended to provide higher capacity transit service to the Westside that would improve upon Metro Rapid Bus service through enhanced BRT features. The features of the Wilshire BRT LPA are discussed more fully in the following sections and include new higher capacity buses; repair of the curb lane in Wilshire Center, Park Mile and Miracle Mile; enhanced station areas; parking facilities in two locations; an enlarged Downtown Bus Storage & Maintenance Facility; and a bus only lane in the peak period (along the curb) if supported by the local jurisdiction.

The table on the following page provides a comparison of the project elements that would be incorporated into each neighborhood segment.



A typical station area concept showing the transit vehicles, landscaping and station amenities.

LOCALLY PREFERRED ALTERNATIVE



The Wilshire Bus Rapid Transit Corridor runs from the Wilshire/Western Metro Red Line Station to the Santa Monica Pier.

PROPOSED IMPROVEMENTS BY NEIGHBORHOOD

	Wilshire Center	Park Mile	Miracle Mile	Beverly Hills	Westwood	County of LA (VA)	West Los Angeles	Santa Monica
New Higher Capacity Bus Transit Vehicles	●	●	●	●	●	●	●	●
Enhanced Station Areas, Shelters and Landscaping	●	●	●	●	●	●	●	●
Curb Lane Repair & Reconstruction	●	●	●					
Bus Stopping Pads	●	●	●		●	●	●	
Parking Facilities		●	●					
Bus Maintenance Facility	*Located in Downtown Los Angeles*							
Peak Period Dedicated Transit Lanes	*Subject to further testing & approvals by each city jurisdiction.*							

LOCALLY PREFERRED ALTERNATIVE

BRT Vehicles

Although the Metro Rapid Bus vehicles are relatively new, they are frequently overcrowded. Additional vehicles have been added to the fleet, which now numbers over 97 vehicles. During the peak period, these vehicles travel at headways of two to three minutes.

In order to address the high demand for rapid service along Wilshire Boulevard, higher-capacity transit vehicles are necessary to provide more room and reduce crowding during peak periods. As an interim step, 45-foot long vehicles as shown in the attached "Compo bus" rendering may be introduced. These vehicles operate on Compressed Natural Gas (CNG), instead of diesel fuel, thereby reducing air quality emissions. They are five feet longer than existing vehicles thereby increasing capacity by about 15 percent.

The next generation of bus is shown in the following images. These vehicles are "articulated", meaning that there is a joint connecting two vehicles. These vehicles are approximately 60 feet in length and provide 50 percent more capacity than current 40-foot buses. They also operate on Compressed Natural Gas or Electric/Hybrid technology, and are designed to provide three doors, for faster boarding and alighting.

The higher capacity vehicles will be able to carry more people in a more comfortable and more convenient manner than the current 40-foot buses through several features. These features will be crucial in reducing the time the vehicle sits at a station loading up or emptying out with passengers commonly known as 'dwell time'.



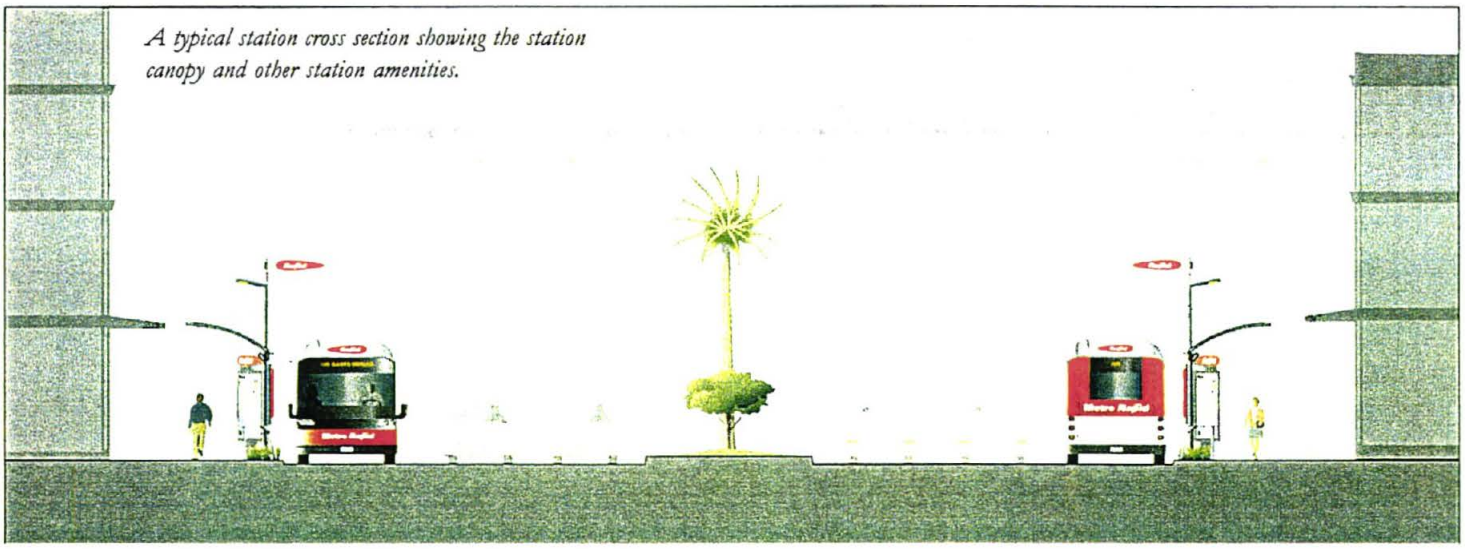
Existing 40-foot transit vehicles will soon be supplemented by the above 45-foot, low floor vehicle or by higher capacity, 60-foot articulated transit vehicles.

Higher Capacity Vehicles: The vehicles will have at least 50 percent more carrying capacity thereby reducing overcrowding.

Multiple Door Boarding: The vehicles will have three doors instead of two, to allow faster boarding and exiting.

Circulation Layout: The internal layout of the vehicle will be designed to minimize bottlenecks near doors allowing passengers to enter and exit easily and quickly.

On Board Fare Validators: The vehicles will be equipped with state of the art smart card fare validators that will allow passengers to enter through any door and validate their fare, avoiding the front door only queuing experienced by customers today. Exact cash fare will be accepted through the front door only.



A typical station cross section showing the station canopy and other station amenities.



New higher capacity Bus Rapid Transit vehicles have recently been developed and implemented across the world and will be soon available for applications in Los Angeles. The sample vehicles shown above and below are 60 feet long with an "articulated" joint. They feature true low floor boarding design and improved circulation and seating.



STATION FEATURES

BRT Stations

The Wilshire BRT enhancements would upgrade existing Metro Rapid shelters at 15 stops along the route. All stations would be configured as split platforms and located on either side of Wilshire Boulevard to serve westbound or eastbound travel demand. A total of 30 shelters will be upgraded along the route. Most stations will be in the same location as the existing Metro Rapid shelters. The distinctive "gates" will be expanded to provide three gates where possible. Each "gate" will frame one of the doors of the new 60-foot articulated buses. Similar to Light Rail Transit, BRT riders would be able to enter or exit the transit vehicles from any door. Smart Card fare media would be read by validators located on-board the buses at each of the three doors. Transit riders would debit fares by waving the Smart Card at the validator upon boarding and exiting the vehicle.

A typical BRT station would consist of a canopy with lighting to protect passengers from sun and rain, boarding gates to act as guides to the vehicle's entry points, and amenities including wayfinding maps, security telephones, bus schedule displays, electronic "Next Bus" arrival messages, landscaping, seating & lean bars, public art, and bicycle facilities (racks and/or lockers).



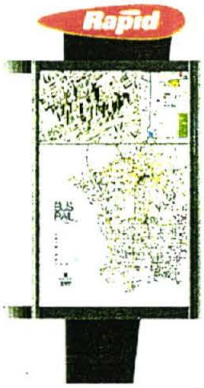
This station concept below shows the westbound transit vehicle approaching the Wilshire / Western Metro Red Line Station. Above, transit patrons are viewing the new information kiosks providing neighborhood and regional information. Bicycle riders will be able to park at the station or mount their bicycles at the front of the vehicle.



STATION FEATURES



On-board fare validator



Kiosk with transit and district maps



Real time bus arrival information at the stop



Emergency/ Information phone



SmartCard

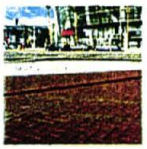


Ticket vending machines nearby



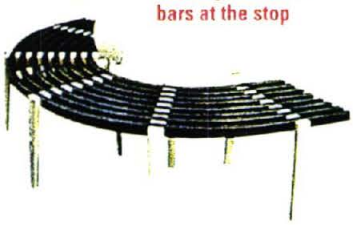


News & information monitors

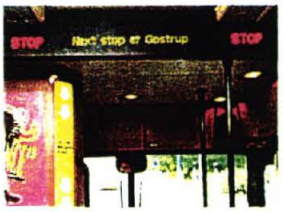


Enhanced crosswalks

Seating and lean bars at the stop



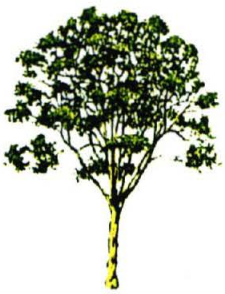
Variable message sign on board the bus



Faster boarding thru multiple doors



Landscaping







The Wilshire BRT stations will have a host of features that will provide the transit rider a safe, informative and comfortable experience.

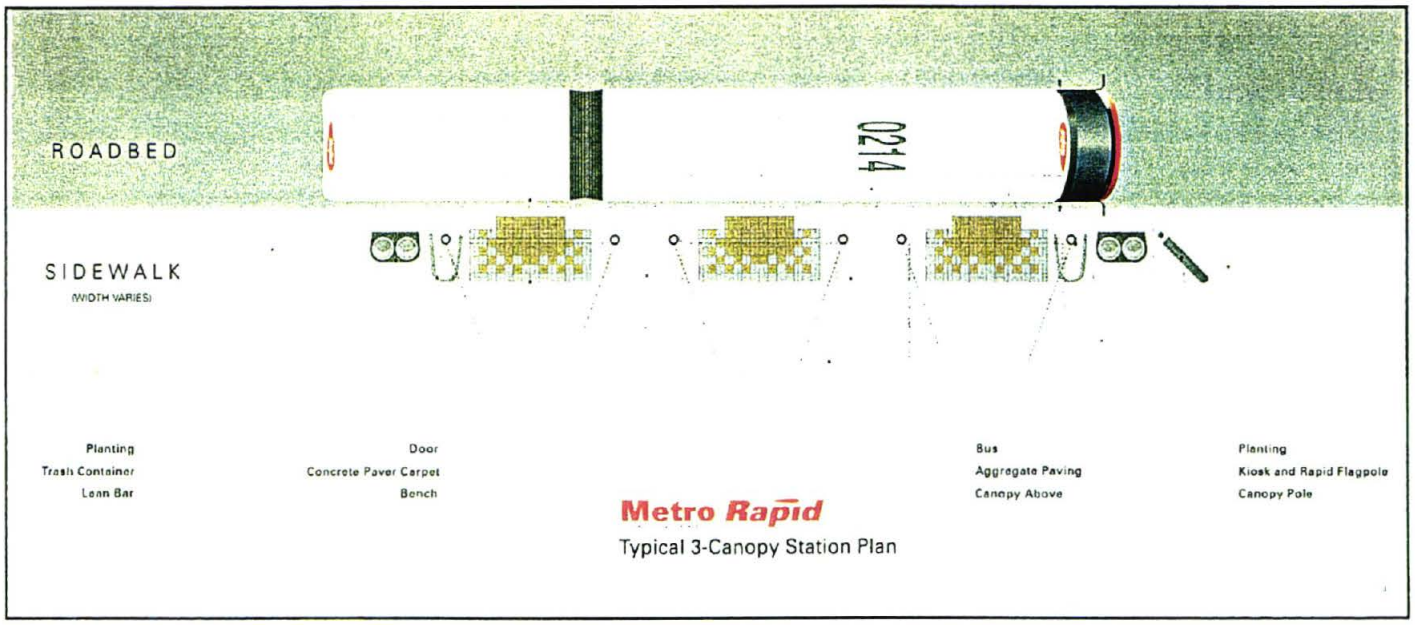
STATION FEATURES

Proposed transit shelters would have three gates to align with each door of the new transit vehicles. Riders could board the bus through any door by using a "smart card" fare card that would electronicallly subtract the appropriate fare. Seating and lean bars would be provided at the stations, as well as security phones and enhanced lighting and "Next Bus" displays. Planting strips are proposed along the curb where space permits.





Typical station showing the canopy, station amenities and the transit vehicle docked as close to the curb as possible ensuring safer and faster boarding.



Typical 3 canopy station plan showing the various station amenities and the vehicle.

Wilshire Boulevard Curb Lane Reconstruction

The repair of Wilshire Boulevard between Western Avenue and San Vicente Boulevard in Wilshire Center, Park Mile and Miracle Mile, will allow both transit vehicles and motorists a more comfortable and safer ride. The current roadway condition includes potholes and a severe cross-slope. Vehicles traveling in the curb lane experience severe bumps at each cross street, coupled with jolts from cracked pavement and potholes. Buses experience frequent damage to undercarriages and unpleasant ride quality for transit riders.

Reconstructing and smoothing the curb lane along this segment will mean the curb lane will be better utilized and will allow for a more comfortable transit service. In addition, concrete bus pads will be installed at Rapid Bus Stops in West Los Angeles, which are currently not large enough to accommodate 60-foot long vehicles.



Currently the quality of the ride in the curb lane is poor due to the disrepair of the roadway surface and because of humps and uneven surfaces created by the crown of cross streets.

The Wilshire BRT Project will repair and reconstruct the curb lane and selected intersections between Western Avenue and the Beverly Hills city limit.



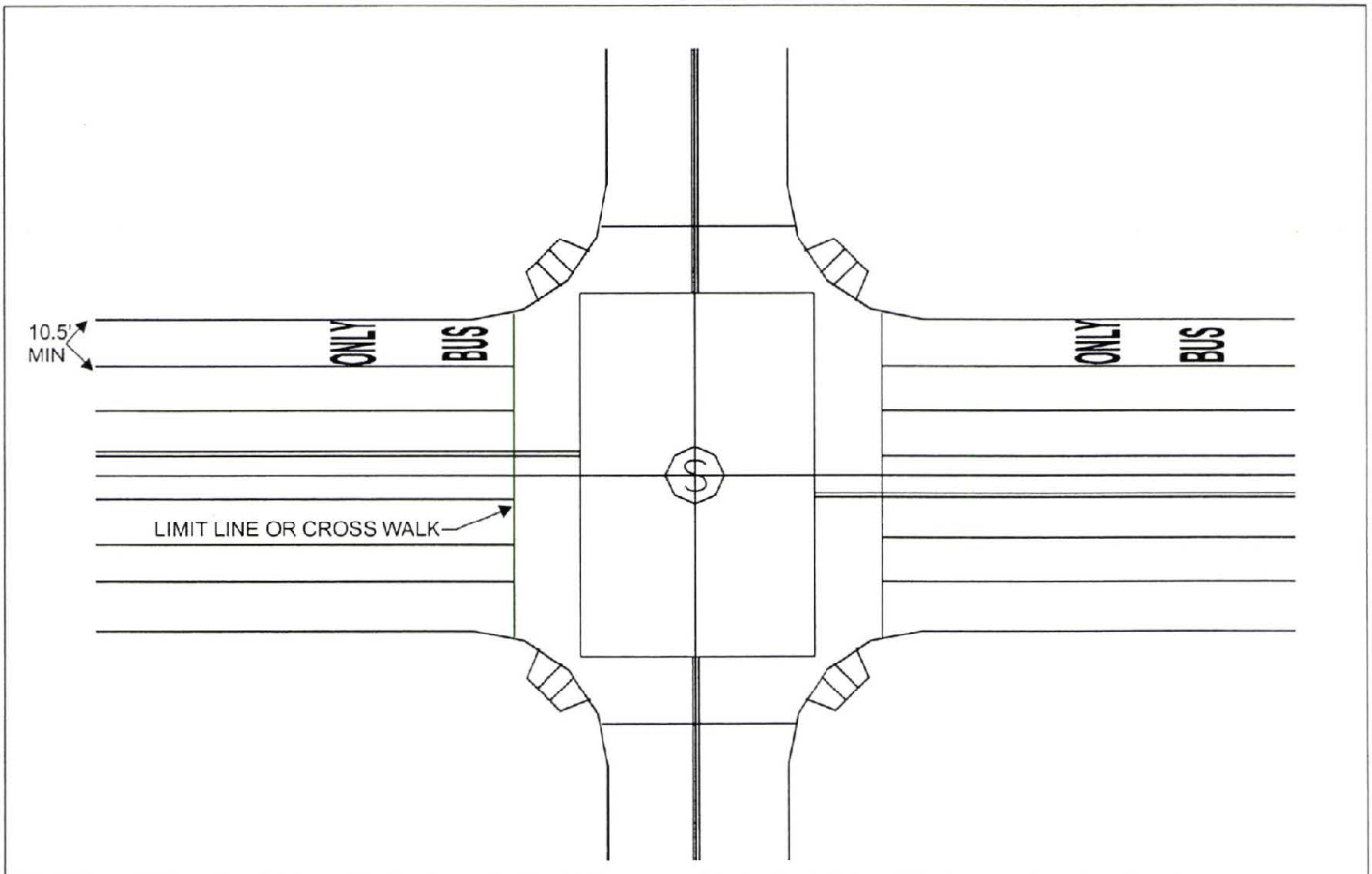
The future condition provides a smoother ride without the humps and jarring that is presently experienced. This illustration shows a possble peak-period bus lane. This feature is subject to support by the City of Los Angeles and would only be implemented with local concurrence. Street reconstruction and repair would proceed independently of any decision regarding dedicated transit lane operation.

Peak Period Bus Lanes

The MTA is proposing dedicated bus lanes in the peak period (7:00am to 9:00am and 4:00pm to 7:00pm) along selected segments of Wilshire Boulevard, if supported by the local city/jurisdiction. Traffic congestion along segments of Wilshire Boulevard is among the worst in the region and traffic has been slowed to less than five miles per hour during many times of the day.

The Metro Rapid Bus has helped to increase speeds through the use of new traffic signal designs that have helped to increase the traffic flow on Wilshire in mixed traffic, with minimal impacts to north-south traffic. Additional signal priority is being sought in Beverly Hills, Santa Monica and the Veteran's Administration Property (operated by the County of Los Angeles). As successful as the traffic signal priority program has been, there are still significant rush hour periods when general traffic (and transit buses) are slowed to less than five miles per hour. The implementation of a transit lane during these peak periods will keep the transit buses moving and provide an incentive for more people to choose transit and help stabilize the number of cars on the road. Overall, the bus lane will allow four to five times the people-moving capacity of a general-purpose lane during these periods of heavy congestion.

Because of the controversial nature of any proposal that would limit availability of the street for automobile use, the MTA is proposing to work with cities to implement demonstration programs for the dedicated lane BRT component. If supported by the city or local jurisdiction, transit riders, residents, businesses and the general public will have an opportunity to see the demonstration project for a limited period of time. The local jurisdiction would determine if there is sufficient public benefit to warrant permanent installation.

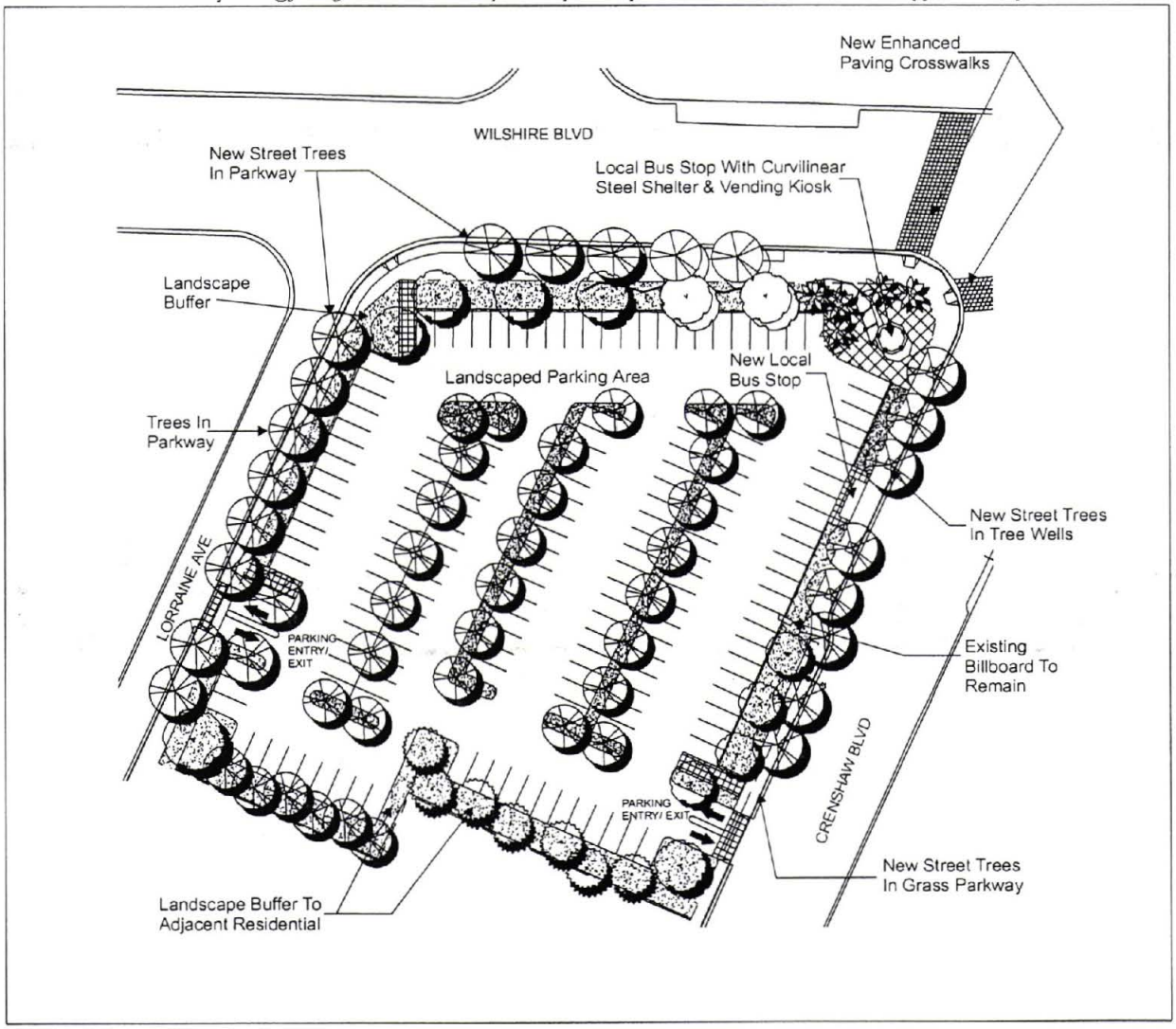


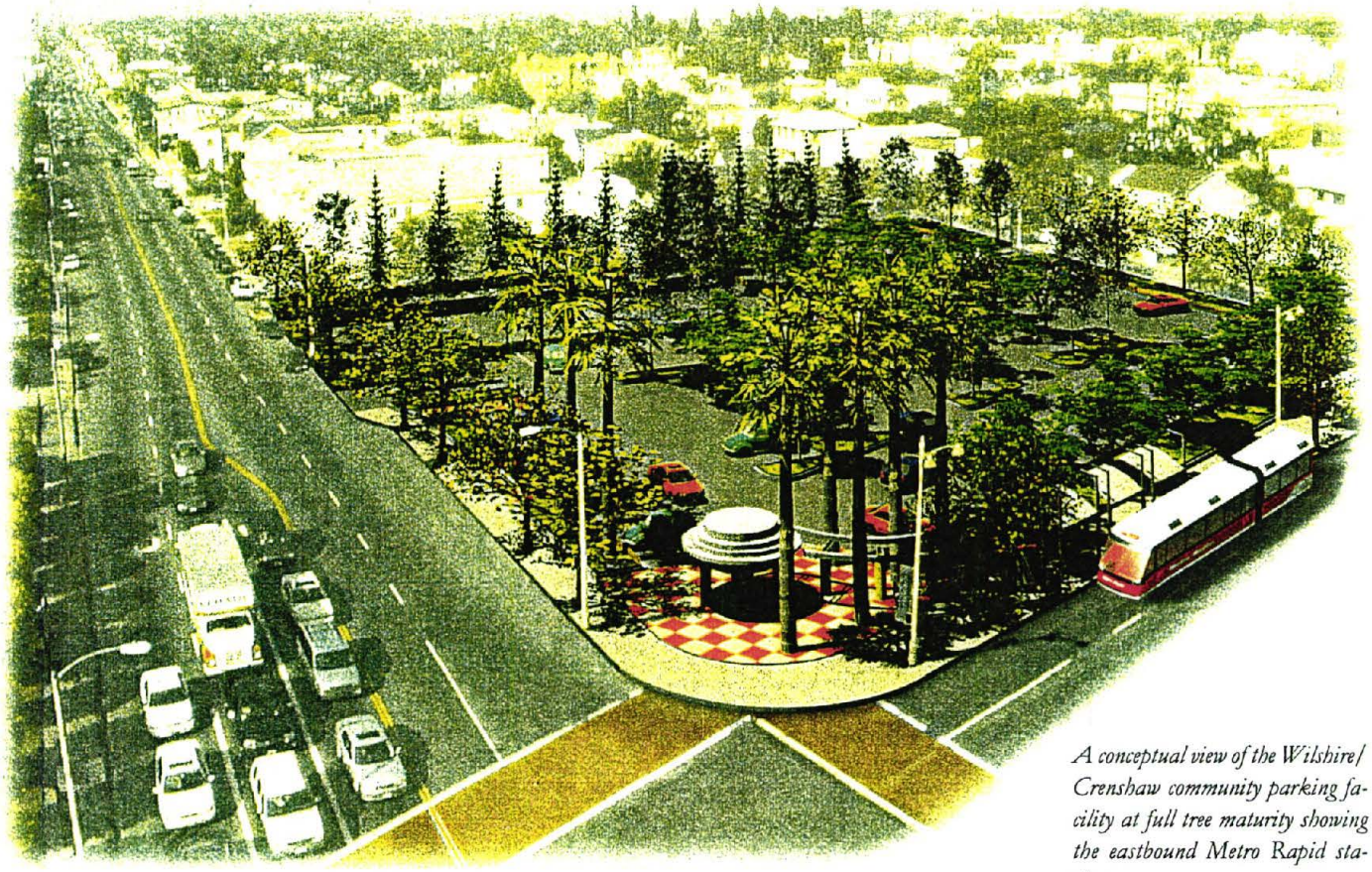
The Wilshire BRT peak period lane will be implemented only with the support of the local jurisdictions. The diagram above shows how the BRT peak period lane would be approximately 10.5 feet wide and will not prohibit left or right hand turning movements.

Crenshaw Parking Facility

The MTA normally constructs park and ride lots as a part of new transit lines to encourage high ridership and provide a place for transit patrons to leave their cars when they board a bus or train. However, no parking lots have been explicitly provided for this purpose along the Wilshire BRT route: 1) because of the density of the Wilshire corridor; and 2) because it the MTA's intent not to attract additional automobile trips into the corridor. However, the MTA owns two sites (one at the southwest corner of Wilshire and Crenshaw Boulevards, and the other at the northwest corner of Wilshire Boulevard and La Brea Avenue) that could be used on an interim basis pending the ultimate development or disposition of these MTA properties. These parking facilities would provide parking for the Wilshire BRT project, as well as parking for those with existing lease agreements with the MTA.

The Wilshire Crenshaw parking facility would be landscaped and provide park and ride and kiss and ride opportunities for transit riders.





A conceptual view of the Wilshire/ Crenshaw community parking facility at full tree maturity showing the eastbound Metro Rapid station.

The MTA-owned Wilshire/Crenshaw site is 1.62 acres. This site contains a surface parking lot with 135 parking spaces that are currently leased to the Los Angeles Unified School District (LAUSD), and a vacant lot. This site also surrounds a 0.17-acre residential parcel on three sides, would be acquired as part of the project.

The future parking facility would provide 167 spaces. The MTA would continue the existing lease agreement with LAUSD. Additional spaces would be available for transit parking. Proposed for this site is enhanced paving in the crosswalks, landscaping with 24-foot and 36-foot box trees providing shade for 50 percent of the area at maturity, bicycle parking facilities, a new local bus stop with a curvilinear steel shelter and a vending kiosk. The landscaping, as well as proposed setbacks, would be in compliance with regulations set forth in the Park Mile Specific Plan. Access would remain at driveways located on Lorraine Avenue and Crenshaw Boulevard.

PARKING FACILITIES

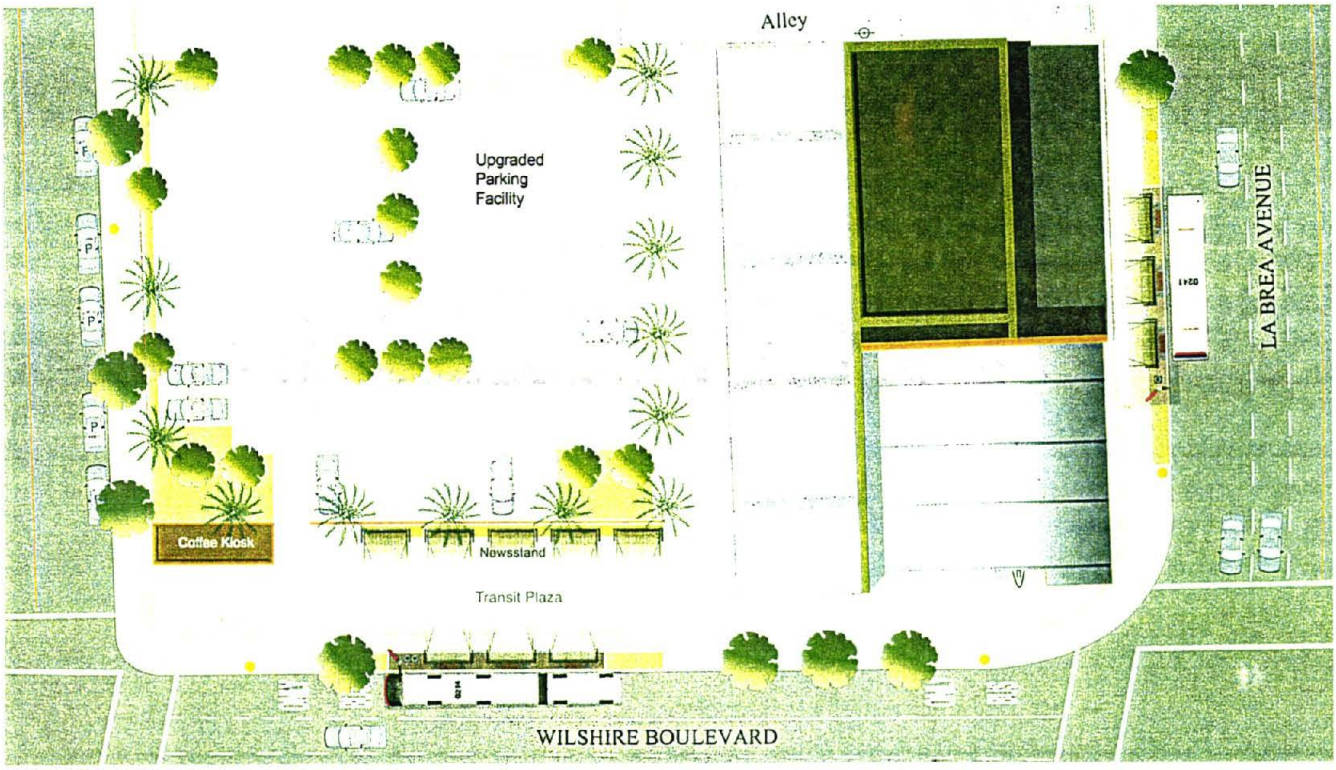
La Brea Parking Facility

The MTA-owned Wilshire/La Brea site is 1.23 acres. The western portion of the site contains a self-service parking lot with approximately 50 spaces, and a newsstand. An unstriped parking lot is north of this lot. The two lots provide parking to surrounding commercial and residential uses. The eastern portion of the site contains an existing building, with a Metro Customer Service Center and a consignment store.

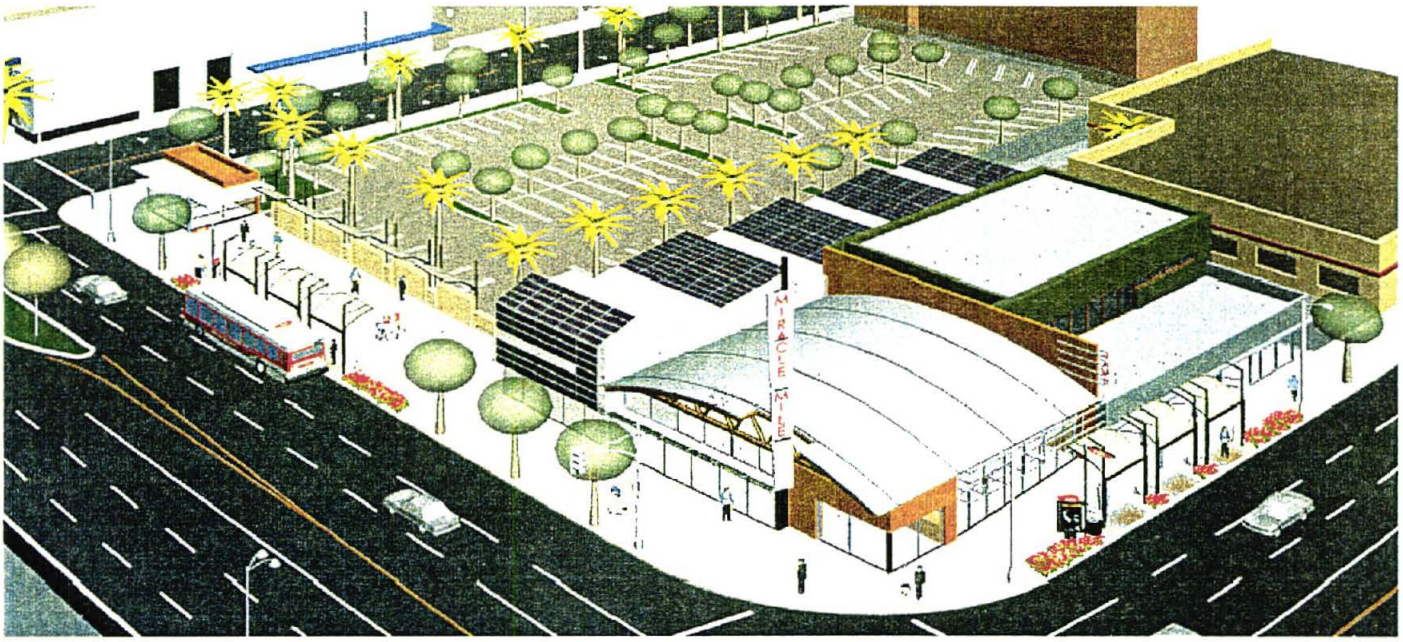
The proposed layout for the future facility at La Brea is shown below. The future facility would involve the resurfacing and repaving of the two parking areas to provide a total of 74 parking spaces. The property would be brought into code compliance and landscaping would be added to the site. The MTA would maintain existing lease agreements; the newsstand owner/patrons use some spaces, while surrounding businesses and residences use other spaces. Additional spaces and bicycle parking facilities would be available for transit patrons. Access would be provided via Detroit Street.

The existing MTA building is not part of the project, however, the illustrations show potential upgrades that could be achieved through MTA's Station Area Development Program.

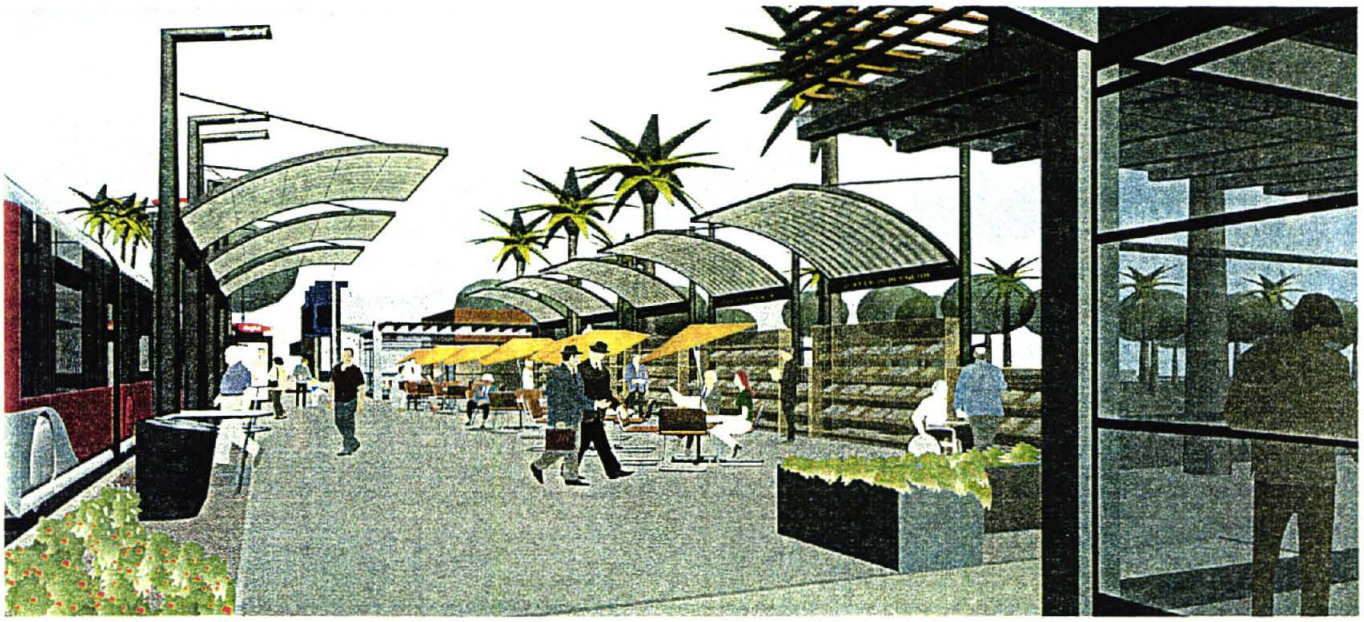
A conceptual station plan of the Wilshire/La Brea community parking facility and transit plaza. The existing spaces at this site will be upgraded to City of Los Angeles standards including landscaping. The site will include a transit plaza offering potential retail opportunities. The existing building is owned by the MTA and currently houses a Customer Service Center and retail use. Although not part of this project, upgrades to this structure may be considered as a part of the MTA's Station Area Development Program.



PARKING FACILITIES



This conceptual rendering shows the station area with the westbound Metro Rapid and the transit plaza adjacent to the station with potential retail opportunities (below). Improvements to the existing MTA-owned structure are not part of the Wilshire BRT project, but may be considered as part of the MTA Station Area Development Program.

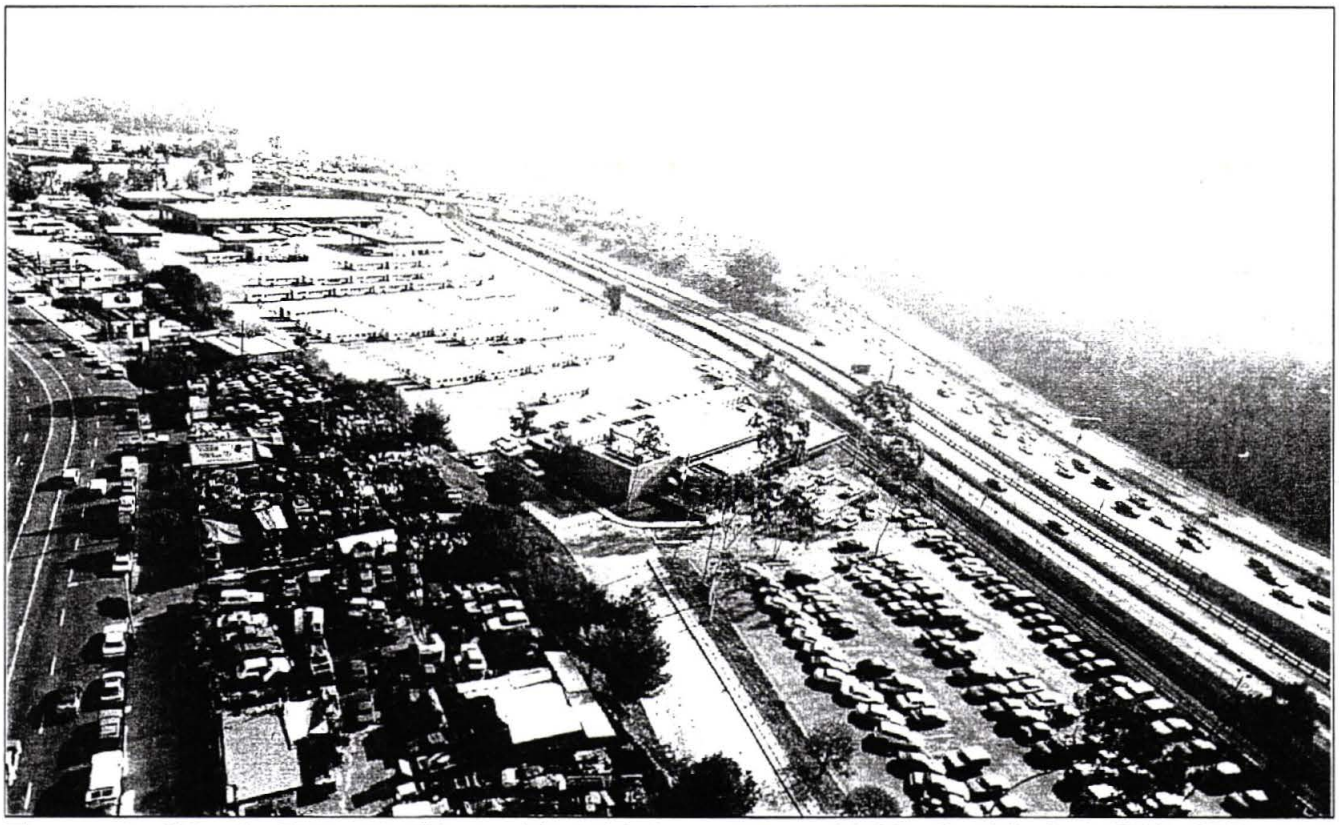


BUS STORAGE AND MAINTENANCE

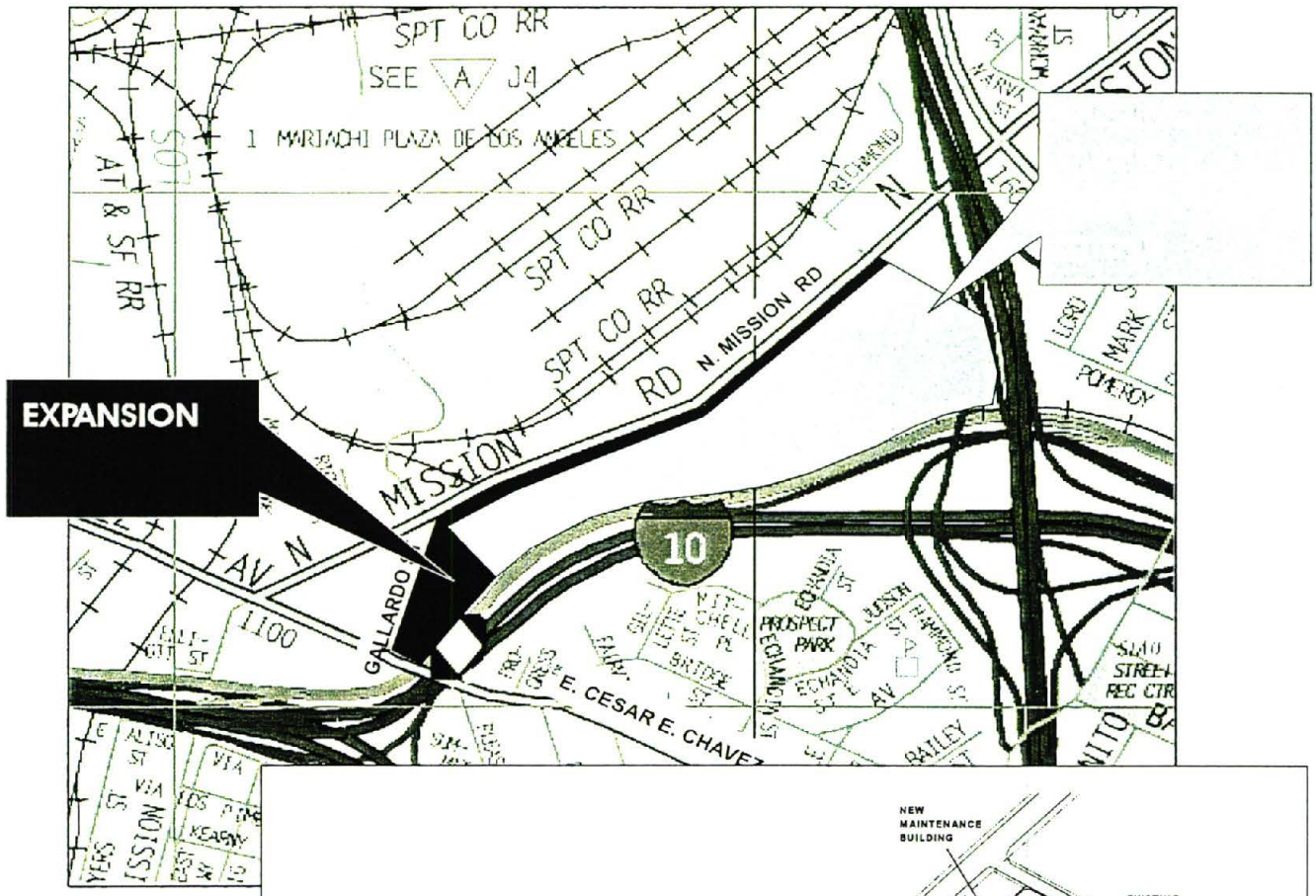
Maintenance and Storage Facilities

The Wilshire BRT system will require a bus storage and maintenance facility. The facility would provide maintenance for the Wilshire BRT and Metro Rapid Bus systems. The Draft EIS/EIR identified several possible sites for this facility and recommended a preferred site at the corner of Washington/Alameda in downtown Los Angeles. Subsequent to the action, the MTA Board removed this site from further consideration and directed that other sites be considered. The second highest ranked site was then identified as the currently proposed expansion of Division 10.

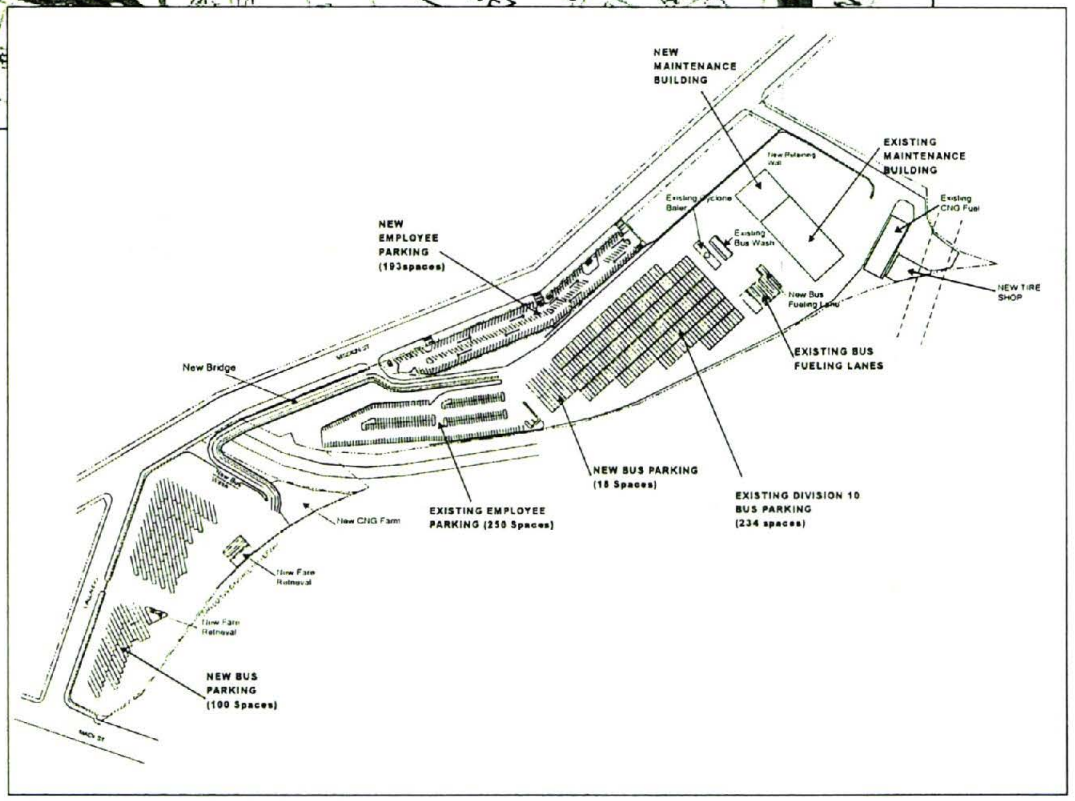
The existing Division 10 maintenance facility is located at 742 North Mission Road in the City of Los Angeles (see figure on following page). This facility is approximately 20.2 acres and has been in operation since 1984. The proposed expansion would add approximately 8.6 acres to the existing facility. The site would be expanded through the acquisition of parcels along the east side of Mission Road and by including a triangular shaped area south of the Metro Link tracks, for a total of 28.8 acres. The completed facility would allow for parking and servicing of approximately 500 buses; approximately 100 additional buses above the 400 vehicles that are presently serviced at this facility (Section 2.0 of the full Final EIR provides more detail on the proposed site).



The current site of Metro Bus Division 10 will be upgraded to include the accommodation of the Metro Rapid fleet for the Wilshire BRT project.



The Metro Bus Division 10 is located at the intersecton the the San Bernardino Freeway (I-10) and the Golden State Freeway (I-5), just east of downtown Los Angeles.



The proposed site plan of the Metro Bus Division 10 will include additional facilities to accommodate the higher capacity transit vehicles

S-6 Final EIR Alternatives

As a basis for the comparison of impacts of the Wilshire BRT LPA, this Final EIR includes two alternatives: No Action and Transportation System Management (TSM).

No Action Alternative (Baseline)

The No Action Alternative is comprised of the existing transit systems currently in use or expected to be in place in 2020. This includes the existing rail transit service with slightly improved frequencies on the Red, Blue, and Green Lines, as well as the approved Pasadena Gold Line. Expansion of regular bus service is assumed based on MTA's commitments to future bus expansion. Metro Rapid Bus services on Wilshire and Whittier Boulevards and Ventura Boulevard are assumed to continue. New High Occupancy Vehicle (HOV) projects are included that can be reasonably completed by 2020. The components are the foundation upon which all other alternatives are based. Please refer to the full Final EIR for more details on this alternative.

Transportation System Management (TSM) Alternative

The TSM alternative is based on the No Action description, with some bus service changes identified in MTA's Westside Bus Service Improvement Study completed in June 1998. Changes include the use of articulated buses, modifying service frequencies to more closely match demand on various routes; route extensions to connect to major destinations and/or transit hubs; route truncations to eliminate unproductive service segments or duplication; consolidation of service to simplify route structure and use; and replacement of unproductive routes. Slightly more frequent service is assumed for the portion of the Wilshire/Whittier rapid bus service serving the Westside. Please refer to the full Final EIR for more details on this alternative.

S-7 Ridership Forecasts

Project ridership under several different operating scenarios is shown below. In the table entitled "Ridership in Forecast Year 2020", a comparison is provided between Year 2020 forecasts for both the TSM and the Wilshire BRT Final EIR Alternatives. The TSM Alternative provides modest enhancements to the existing Metro Rapid Bus Service, without the additional features of Bus Rapid Transit that are included in the proposed project. The forecast indicates that the Wilshire BRT project would add approximately 6,200 new daily transit trips to the countywide system, as compared to 1,100 trips that would be added if only the TSM project were implemented. Using relatively conservative assumptions, this model forecasted a total of 45,500 daily boardings in the project area for the Metro Rapid Bus with BRT enhancements.

The second table provides a comparison of daily boardings compared with existing Metro Rapid Bus Boardings, assuming alternative operating plans with peak service frequencies between two to three minutes. The Full Route describes total boardings over the full 26 miles of the Metro Rapid Bus Line #720 between Santa Monica and Montebello. The "Project Area" boardings describe the total boardings in the project area between Santa Monica and Wilshire/Western. Existing passenger counts taken in 2001 indicated that Metro Rapid Bus has a current total of 40,300 boardings per day over the full route, and 17,100 boardings per day in the project area. These amounts are modeled to increase by 141 percent if the TSM Alternative is implemented in 2020 and between 180 percent and 211 percent if the full Wilshire BRT set of enhancements are implemented. A total of up to 53,100 boardings per day could be achieved in the project area and 88,000 boardings per day could be achieved over the full route to Montebello.

RIDERSHIP IN FORECAST YEAR 2020

Alternative	*Daily Fixed Guideway Boardings*[1, 2]	*Incremental Linked Trips (Daily)*[2] *To No Action*	*To TSM*
TSM	N/A	1,100	N/A
Wilshire BRT	45,500	6,200	5,100

1. Boardings for segment in project area only, from Western Ave to downtown Santa Monica (does not include entire rapid bus route).

2. Adjusted from Draft EIS/EIR to reflect BRT in peak period only.

COMPARISON OF DAILY BOARDINGS (Route 720)

Alternative	Daily Boardings: Full Route	Daily Boardings: Project Area	Percent Change from 2001	Percent Change from updated TSM
Existing Passenger Counts (2001)	40,300	17,100	N/A	N/A
2020 TSM with 2001 Operating Plan	67,500	41,200	141%	N/A
2020 Wilshire BRT with 2001 Operating Plan	79,400	47,800	180%	16%
2020 Wilshire BRT with Alternate Operating Plan	88,000	53,100	211%	29%

Full route boardings include all route patterns from downtown Santa Monica to Montebello (26 miles).

Project area boardings include all route patterns from Western Ave to downtown Santa Monica (13 miles)

MTA passenger count data from Summer, 2001.

S-8 Capital Cost Estimate

The table below provides the estimated capital costs of the Wilshire BRT project in 2001 dollars and "Year of Expenditure" dollars. In order to account for inflation, the second figure provides the cost of the project in the year that the funds are spent, and therefore is a truer indicator of the costs to be incurred. The various elements of the project would be procured and constructed on different time schedules, however, all project elements are scheduled to be in service by November 2005.

S-9 Bus Transit Speeds and Reductions in Travel Time

Before the implementation of Metro Rapid in June 2000, MTA Bus Lines 18, 20 and 320 served the project area. The peak period average speed of this service was approximately 12 miles per hour. At that time, the average travel time to complete the journey from Wilshire/Western to the Santa Monica Pier was approximately 65 to 69 minutes.

Today, the Metro Rapid has an average peak period speed of approximately 16 miles per hour, an increase of approximately 25 percent. This improvement has come about primarily through the reduction in the total number of stops and the implementation of traffic signal priority in the City of Los Angeles segments of the corridor. Peak period average travel times from Wilshire/Western to Santa Monica Pier are approximately 50 to 55 minutes, a reduction of between 10 and 19 minutes per trip.

The BRT enhancements included in the Locally Preferred Alternative would build upon the current Metro Rapid successes with the implementation of several additional features. These have been analyzed using existing and projected data to see how each individual component is effective in reducing the travel times within the corridor. The chart on the following page shows that the Wilshire BRT would achieve a 10 to 12 minute decrease in travel time from the existing Metro Rapid service. This is due to a combination of the project components including:

WILSHIRE BUS RAPID TRANSIT PROJECT
SUMMARY OF COSTS (Millions)

Project Elements	2001 Dollars	Year of Expenditure Dollars
Vehicles	$75.8	$82.3
Stations and Systems	$8.7	$9.4
Curb Lane Repair & Reconstruction	$6.1	$6.5
Maintenance Facility	$27.9	$29.2
Right-of-Way	$25.0	$26.1
Special Conditions	$14.8	$15.7
Subtotal	**$158.3**	**$169.2**
Professional Services	$20.5	$21.6
Project Contingency	$38.6	$41.4
Subtotal	**$59.1**	**$63.0**
TOTAL PROJECT COST	**$217.4**	**$232.2**

Unescalated BRT vehicle cost assumes 97 vehicles at $710,000 each plus $71,000 each for spare parts = $75.8 million.

Special conditions include utility relocation, environmental hazardous soil treatment, master cooperative agreements, insurance, testing, Art for Transit Program, traffic signal priority, neighborhood and environmental mitigation.

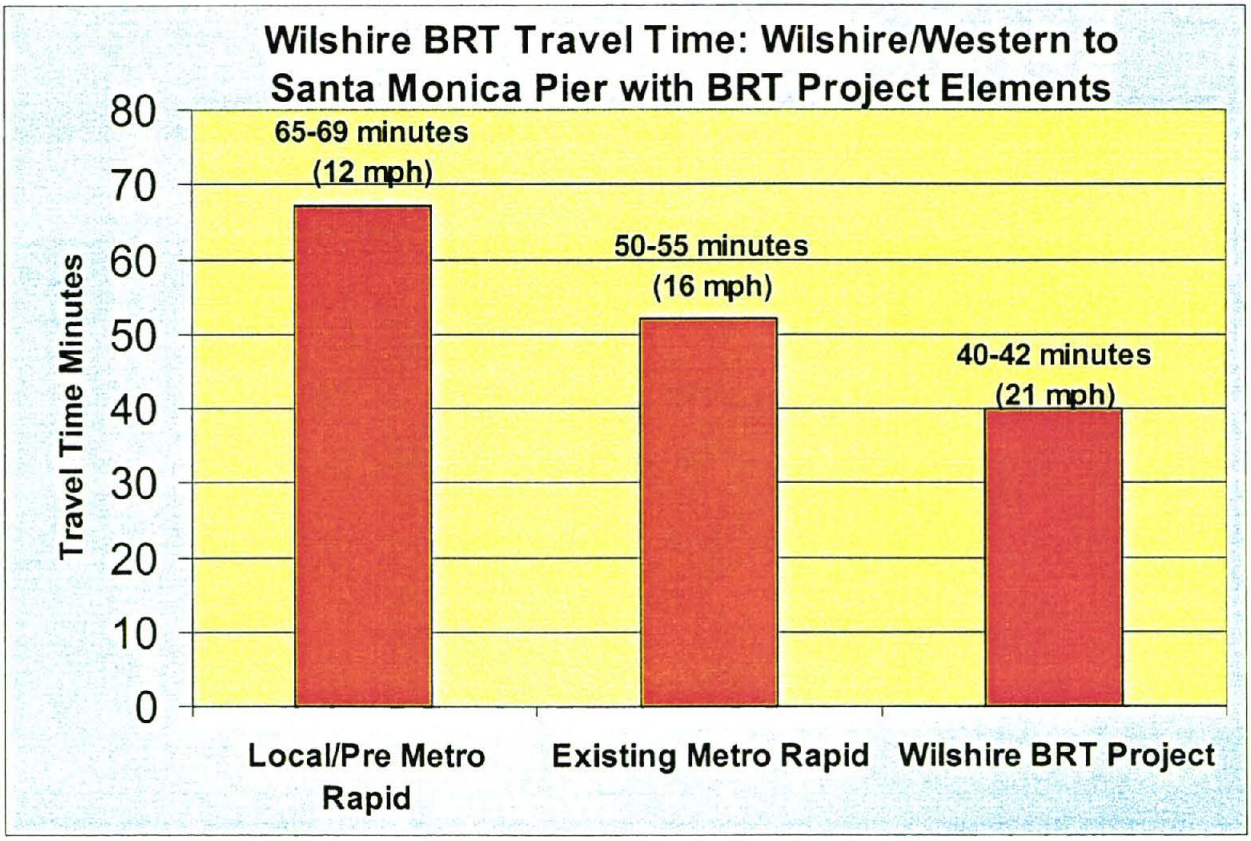
Professional Services include engineering, construction management, agency and specialty consultants.

BRT Vehicle & Station Enhancements – Three-door buses, multiple-door boarding and exiting, and improved "smart card" fare collection systems reduce the time that the bus is stopped at the stations. At several of the highly patronized stations, this will greatly reduce the waiting time that riders presently experience as each rider must board and pay at the farebox located only at the front of the bus. Multiple doors and fare pre-payment would allow riders to board and alight more quickly, similar to a rail car. This reduces the amount of time the bus is stopped at the station and is the single, most effective strategy to improve existing bus speeds in the corridor. Approximately two thirds of the expected increase in travel speeds over current levels would be attributable to BRT vehicle and station enhancements.

The most noticeable improvements would be at Wilshire/Western, Wilshire/La Brea,Wilshire/Westwood, and Ocean/Colorado stations, where bus dwell times would be reduced by more than 50 percent. An average trip from Wilshire/Western to the Santa Monica Pier would be reduced by between 6 and 11 minutes.

Expanded Traffic Signal Priority - The current bus signal priority system has only been implemented in the City of Los Angeles to date. Expansion of signal priority into the cities of Beverly Hills, Santa Monica, and the County of Los Angeles (VA Hospital Property) would provide the next most cost-effective strategy to improve bus speeds in the corridor.

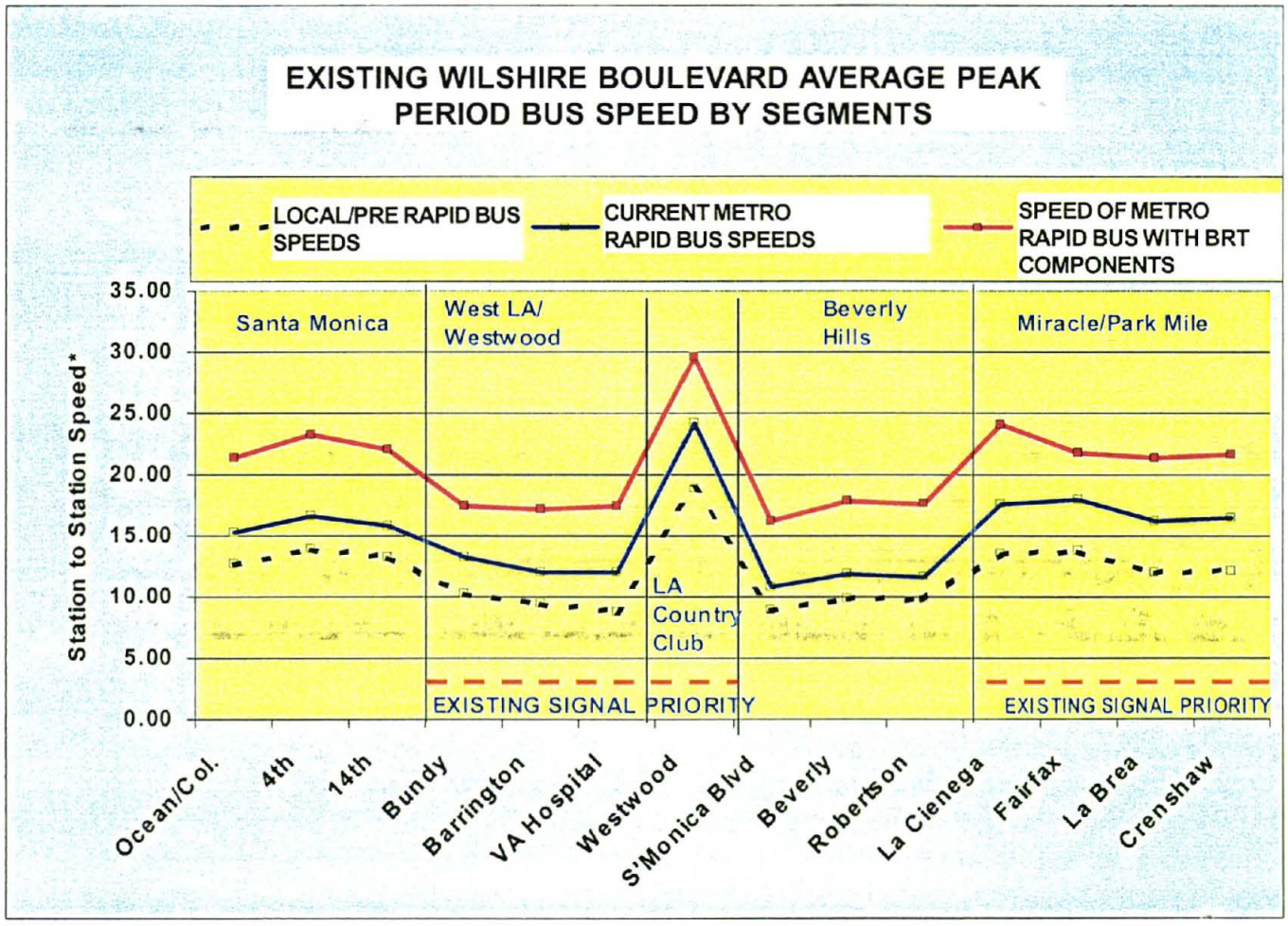
Previous studies undertaken by the MTA and LADOT have determined that traffic signal priority accounts for between 7 to 15 percent of increases in bus speeds. If such decreases in travel time were applied to the segments of Beverly Hills and Santa Monica where no such priority presently exists, the average daily run times would decrease approximately three to four percent over existing Metro Rapid service. This very low cost component would reduce peak run times by about one to three minutes for a typical peak-hour trip between Wilshire/Western and the Santa Monica Pier.



The Metro Rapid has improved travel times in the project area by 25 percent. The Wilshire BRT will further improve travel times by another 25 percent. The same trip will now be about 15 minutes shoret than today's Metro Rapid and almost 30 minutes shorter than local buses.

Peak Period Dedicated Bus Lanes - The third component, Peak-Period Dedicated Bus Lanes, if implemented in segments between Western Avenue and Santa Monica City limits with the approval of the local jurisdictions would reduce peak run times by an additional two to four minutes, or between 40 to 42 minutes for a typical trip between Wilshire/Western and the Santa Monica Pier during periods of heavy traffic congestion when bus travel times are slowed.

The chart below entitled Wilshire Boulevard Average Peak Period Bus Speed by Segments shows that by combining the proposed BRT Components, average bus speeds would increase from approximately 16 miles per hour on current Metro Rapid Service to approximately 21 miles per hour. Most areas show improvements in bus speeds particularly in Beverly Hills and Westwood. However, bus speeds vary greatly across the corridor. This is due to the varying capacity of the boulevard and the street geometrics. Los Angeles is a series of grid networks and in Beverly Hills and Santa Monica that grid is turned on an axis. In Beverly Hills, for example three major boulevards terminate in the Beverly Hills Business Triangle causing a "junction like effect." In Westwood, the street network experiences great traffic congestion due to conflicts between Westwood Boulevard, Sepulveda Boulevard and the I-405 freeway. Not surprisingly, Beverly Hills and the Westwood/1-405 junction have the slowest travel speeds in the corridor. The area between the city of Beverly Hills, the Los Angeles Country Club and Westwood Boulevard, commonly referred to as 'Condo Canyon,' have the fastest travel times of any segment along the corridor.



The chart above shows that travel speeds vary greatly along the corridor. Westwood and Beverly Hills have the greatest congestion and these segments travel speeds in these segments would benefit most from the BRT components.

For a relatively low cost, the travel time of the corridor could be reduced to approximately 40 to 42 minutes during the peak period, a substantial reduction from the Pre-Metro Rapid time of 65 to 69 minutes.

S-10 Environmental Evaluation

Environmental Analysis

To meet the requirements of state law, the environmental analysis of the LPA and alternatives addresses a variety of impact topics. Some of the categories were determined to result in significant or less than significant impacts. These include:

- Traffic and Circulation
- Parking
- Land Acquisition/Displacement/Relocation
- Visual Quality
- Geology/Soils/Seismicity
- Safety and Security
- Construction Impacts
- Hazards

These issues are discussed in Section 3.0 of the Final EIR.

Impact categories that were determined not to have significant impacts include:

- Socioeconomics
- Land Use/Neighborhoods
- Air Quality Operations
- Noise and Vibration
- Water Resources
- Biological Resources
- Energy Resources
- Community Facilities
- Cultural Resources

These issues are discussed in Section 4.0 of the Final EIR.

A summary of the environmental impacts for the project components appears in the table on the following page.

The table entitled Summary of Environmental Impacts provides a summary of the environmental effects of the Wilshire BRT project. As discussed in sections above, the project includes a series of components: vehicles, stations, curb lane repair, parking facilities, and a bus maintenance facility.

Impacts classified as significant or Less Than Significant After Mitigation were reviewed to identify appropriate mitigation measures that would reduce or eliminate the impact. These impacts and mitigation measures are described more fully in the following table, entitled Summary of Environmental Impacts By Project Component. For a fuller discussion, please see the Final EIR Chapters 3.0 and 4.0.

It should be noted that the tables present impacts associated with the operation of the peak period lane and the impacts associated with the reconstruction of the curb lane. These are described separately as the issues associated with each are different. Many of the environmental impacts associated with the lane reconstruction would occur only during the time of the construction, and would be temporary and short-term. A Construction Mitigation Plan has been developed to reduce the impacts associated with the lane reconstruction and impacts associated with this component of the project have been reduced to less than significant with implementation of this plan.

SUMMARY OF ENVIRONMENTAL IMPACTS

Impact Topic	Curb Lane Reconstruction & Bus Lane Operation	Community Parking	Bus Maintenance Facility
Traffic	**S**	LS	LS
Parking	LSM	LS	N
Socioeconomics	DNS	DNS	DNS
Land Use/Neighborhoods	DNS	DNS	DNS
Acquisition/Displacement	N	LS	LSM
Visual Quality	LSM	LSM	LSM
Air Quality	DNS	DNS	DNS
Noise & Vibration	DNS	DNS	DNS
Geology/Seismicity	N	N	LSM
Water Resources	DNS	DNS	DNS
Biology	DNS	DNS	DNS
Energy	DNS	DNS	DNS
Safety & Security	LSM	LS	LS
Community Facilities	DNS	DNS	DNS
Cultural Resources	DNS	DNS	DNS
Construction-Hazards	N	DNS	LSM
Construction-Traffic	**S**	LSM	LSM
Construction-CO Hot Spots	**S**	LS	LS
S = Significant			
LSM = Less than Significant After Mitigation			
LS = Less than Significant			
N = No Impact			
DNS = Determined Not to be Significant			

SUMMARY OF ENVIRONMENTAL IMPACTS BY PROJECT COMPONENT			
Impact Category	**Curb Lane Reconstruction & Peak Period Bus Lane Operation**	**Parking Facilities**	**Downtown Bus Storage & Maintenance Facility**
Traffic and Circulation (Section 3.2)			
Transit System	Beneficial impact through increased transit mode share, new transit riders, and higher capacity system.	Beneficial impact through provision of some parking for riders at two community parking facilities.	Beneficial impact through provision of new and improved maintenance facility.
Mitigation for Transit System: None required.			
Highway Performance	Less than significant. The total Vehicle Miles Travelled (VMT) decreases slightly in the study area while VMT and Vehicle Hours Travelled (VHT) increases slightly countywide. Such changes are very slight and do not exceed threshold standards for significance.	Less than significant. Some additional trips may be made to and from the parking facilities, however, numbers of new trips would be very small given that only a portion of the total parking spaces would be available for transit riders. The remainder of the spaces are committed for other community uses.	No impact.
Mitigation for Highway Performacnce: None required.			
Freeway Impacts	Significant. The peak period bus lane would divert traffic from Wilshire Boulevard to the Santa Monica Freeway would experience an increase of up to 1.25% in vehicular traffic during the peak hour if the dedicated bus lane were fully implemented throughout the corridor. This reduction in traffic volume on the freeway would be balanced by the increase of 6,200 new transit trips per day that had previously been primarily automobile trips.	No impact.	Less than significant. Some buses use the Santa Monica Freeway and Alameda Street to "deadhead" or run in non-revenue service. However, given that vehicles would be using the freeway during off-peak hours, travel via the freeway is not anticipated to significantly impact freeway operations.
Mitigation for Freeway Impacts: No feasible mitigation available for automobile trips diverted to the freeway.			
Arterial Street System and Traffic Diversion	Less than Significant After Mitigation. Peak hour traffic volumes on Wilshire drop by 25% to 50% compared to No Action. If the dedicated bus lane were implemented throughout the corridor, trips would be shifted to east-west facilities throughout corridor. Relatively even distribution of diverted traffic across study area.	Less than significant. Some trips would be made to/from parking lot, however, minimal parking is provided to transit riders and these trips would not result in a significant impact.	Less than significant. Some buses may deadhead to/from site via Alameda Street. However, given that vehicles would travel in off-peak, travel via Alameda (one mile from freeway) is not anticipated to significantly impact Alameda Street operations.
Mitigation for Arterial Street System and Traffic Diversion Impacts: See Mitigation Measures 3.2-1 through 3.2-5			
Intersection Traffic	Significant at two intersections after Mitigation. If the dedicated bus lane were implemented throughout the corridor, significant impacts would occur at Wilshire/Westwood and Wilshire/La Cienega intersections during the peak period due to loss of one through lane for general automobile traffic. Also, given that new phasing would be introduced to provide a right turn phase, a slight increase in the wait time at intersections would occur, which is Less Than Significant.	No impact.	No impact.
Mitigation for Intersection Traffic: See Mitigation Measures 3.2-1 through 3.2-5			

ENVIRONMENTAL IMPACT SUMMARY

SUMMARY OF ENVIRONMENTAL IMPACTS BY PROJECT COMPONENT			
Impact Category	**Curb Lane Reconstruction & Peak Period Bus Lane Operation**	**Parking Facilities**	**Downtown Bus Storage & Maintenance Facility**
Traffic and Circulation (continued)			
Neighborhood Traffic	Less Than Significant After Mitigation. If the dedicated bus lane were implemented throughout the corridor, some traffic may be redistributed to neighborhood streets due to peak period reduction in general purpose automotive lanes on Wilshire Boulevard.	No Impact	No Impact
Mitigation for Neighborhood Traffic: See Mitigation Measures 3.2-1 and 3.2-5.			
Parking (Section 3.3)			
On-Street Parking	Less Than Significant after Mitigation. Up to nine (9) on-street parking spaces would be removed at 4th and 14th Street Stations in Santa Monica to allow for new Metro Rapid bus stops. Approximately 167 metered parking spaces would be removed from service during peak hours in the West LA segment between Centinela and Federal if the peak period bus lane were implemented. Spaces would remain in use during non-peak periods and weekends.	No impact.	No impact.
Mitigation for On-Street Parking: See Mitigation Measure 3.3-1.			
Station Area Spillover Parking	Less than significant. Patrons are expected to walk to stations, transfer from other bus routes, or be dropped off at stations.	Less than significant. Some patrons could drive to two community lots, and, not finding parking could park on surrounding streets. Current parking restrictions would reduce impact to less than significant.	No impact.
Mitigation for Station Area Spillover Parking: None required.			
Land Use, Acquisition & Displacement (Section 3.4)			
Land Acquisition/ Displacement and Relocation	No impact.	Less than significant. One residential property would be acquired.	Less than significant after mitigation. Any businesses on- site at time of MTA purchase would be eligible for relocation assistance.
Mitigation for Land Acquisition/Diplacement and Relocation: See Mitigation Measure 3.4-1			
Visual Quality (Section 3.5)			
Installation of Physical Structures on Sensitive Views	Less than significant. Stations/shelters follow present Metro Rapid Station design that does not obstruct access to adjacent businesses or views of business signage.	No impact.	Less than significant. Nearest adjacent sensitive uses are across the I-10 Freeway from the site on top of a 50-60 foot high bluff.
Mitigation for Installation of Physical Structures on Sensitive Views: None required.			
Spillover Light and Glare	No impact.	Less than significant after mitigation. Any new sources of light at parking lots would be shielded to prevent spillover onto adjacent properties.	Less than significant given that no sensitive receptors surround facility site.
Mitigation for Spillover Light and Glare: See Mitigation Measures 3.5-1 and 3.5-2 for parking facilities.			

SUMMARY OF ENVIRONMENTAL IMPACTS BY PROJECT COMPONENT			
Impact Category	**Curb Lane Reconstruction & Peak Period Bus Lane Operation**	**Parking Facilities**	**Downtown Bus Storage & Maintenance Facility**
Visual Quality (continued)			
Privacy	No impact.	Less than significant after mitigation of potential intrusion from parking lots with screening measures to reduce impact.	No impact.
Mitigation for Privacy: See Mitigation Measure 3.5-2			
Geology (Section 3.6)			
Geology/Soils/ Seismicity	No impact.	No impact.	Less than significant after mitigation. Some geological hazards may exist, however, these would be reduced to less than significant through geotechnical study and implementation of mitigation prior to construction.
Mitigation for Geology/Soils/Seismicity: See Mitigation Measure 3.6-1			
Safety and Security (Section 3.7)			
Safety and Security	Less than significant after mitigation. A right turn signal phase has been proposed to allow turning vehicles to exit the bus lane before the bus arrives at the intersection. This right turn movement could conflict with pedestrian traffic at heavily used intersections.	Less than significant given that safety features planned for parking lots would improve upon existing conditions.	Less than significant impact given that facility would be a secured environment with no public access.
Mitigation for Safety and Security: See Mitigation Measures 3.7-1 through 3.7-3			
Construction Impacts (Section 3.8)			
Traffic	Significant. Traffic generated by construction workers and trucks hauling excavated materials or construction supplies would reduce the capacity of the existing street causing traffic detours and delays for a period of 3-4 weeks in Wilshire Center, Park Mile and Miracle Mile.	Less than significant after mitigation. Traffic generated by construction workers and trucks hauling excavated materials or construction supplies would reduce capacity, reduce daytime speeds, and cause inconvenience to motorists for a limited time during construction.	Less than significant after mitigation. Traffic generated by construction workers and trucks hauling excavated materials or construction supplies would reduce capacity, reduce daytime speeds, and cause inconvenience to motorists for a limited time during construction.
Mitigation for Traffic: See the Construction Mitigation Plan in the Final Environmental Impact Report Appendix.			
Accessibility to Businesses	Less than significant after mitigation. Businesses on Wilshire Boulevard would remain open during reconstruction of travel lanes. However, accessibility to these businesses would be impacted. Mitigation measures would reduce impacts on the affected businesses.	No impact.	No impact.
Mitigation for Traffic: See the Construction Mitigation Plan in the Final Environmental Impact Report Appendix.			
Parking	Less than significant after mitigation. Parking for contractor and subcontractor employees would potentially limit the amount of on-street parking in the construction area. Mitigation measures would limit the impacts associated with contractor and subcontractor parking.	Less than significant after mitigation. Parking for contractor and subcontractor employees would potentially limit the amount of on-street parking in the construction area. Mitigation measures would limit the impacts associated with contractor and subcontractor parking.	No impact.
Mitigation for Traffic: See the Construction Mitigation Plan in the Final Environmental Impact Report Appendix.			

ENVIRONMENTAL IMPACT SUMMARY

SUMMARY OF ENVIRONMENTAL IMPACTS BY PROJECT COMPONENT			
Impact Category	**Curb Lane Reconstruction & Peak Period Bus Lane Operation**	**Parking Facilities**	**Downtown Bus Storage & Maintenance Facility**
Construction (continued)			
Pedestrian Access	Less than significant after mitigation. Pedestrian access to properties adjoining construction areas would be maintained, although in some instances, at station areas, portions of the sidewalks may be closed temporarily for station construction.	No impact.	No impact.
Mitigation for Pedestrian Access: See Construction Mitigation Plan in Final Environmental Impact Report Appendix.			
Public Safety	Less than significant after mitigation. Construction activities would necessitate removal and replacement of a few existing lighting facilities during station construction. Temporary street lighting would be necessary to provide for safety and security.	Less than significant after mitigation. The construction site would require a barrier to protect the public from potentially unsafe construction and to prohibit unauthorized entry.	Less than significant after mitigation. Access to the construction site would be controlled to protect the public from potentially unsafe construction.
Mitigation for Public Safety: See Construction Mitigation Plan in Final Environmental Impact Report Appendix.			
Street and Sidewalk Maintenance	Less than significant after mitigation. During construction, the City of Los Angeles normal street and sidewalk maintenance activities will not be performed within the project limits where the Contractor has taken possession for construction staging purposes. The Contractor would be responsible for these functions.	No impact.	No impact.
Mitigation for Street and Sidewalk Maintenance: See Construction Mitigation Plan in Final Environmental Impact Report Appendix.			
Noise/Vibration Control and Monitoring	Less than significant after mitigation. A noticeable change (five decibels or greater) in ambient noise level could occur at a distance of up to 250 feet from the construction noise source. However, construction generated noise would be subject to the City of Los Angeles noise ordinance and the provisions of all applicable laws and regulations.	Less than significant after mitigation. A noticeable change (five decibels or greater) in ambient noise level could occur at a distance of up to 400 feet from the construction noise source. However, construction generated noise would be subject to the City of Los Angeles noise ordinance and the provisions of all applicable laws and regulations.	Less than significant. The nearest sensitive land use within the proposed bus maintenance facility are residential uses on the other side of the I-10 San Bernardino Freeway west of the construction area. Given the distance of the maintenance facility to the residential uses and that buildings and freeways separate these two areas, it is anticipated that construction noise from the maintenance facility would not result in a noticeable change in sound level at the residential uses.
Mitigation for Noise/Vibration Control and Monitoringl: See Construction Mitigation Plan in Final Environmental Impact Report Appendix.			
Drainage and Erosion Control	Less than significant after mitigation. Roadway reconstruction would likely impact water quality primarily due to runoff from exposed excavated surfaces. Drainage and erosion control would limit impacts to water quality in storm sewers.	Less than Significant after Mitigation. Construction would likely impact water quality primarily due to runoff from the removal of paved surfaces. Drainage and erosion control would limit impacts to water quality in storm sewers.	Less than Significant after Mitigation. Construction would likely impact water quality primarily due to runoff from exposed excavated surfaces. Drainage and erosion control would limit impacts to water quality in storm sewers.
Mitigation for Drainage and Erosion Control: See Construction Mitigation Plan in Final Environmental Impact Report Appendix.			
Air Quality - Regional Emissions	Less than significant after mitigation. PM10 emissions during reconstruction of roadway would exceed the SCAQMD daily significance threshold of 150 pounds per day (ppd) for PM10. Site watering would reduce PM10 emissions from 311 to 116 ppd, which would be below the SCAQMD significant threshold for PM10.	Less than significant. Construction of the two parking facilities are not anticipated to exceed any of the SCAQMD significance thresholds for criteria pollutants.	Less than significant after mitigation. PM10 emissions during reconstruction of roadway would exceed the SCAQMD daily significance threshold of 150 pounds per day (ppd) for PM10. Site watering would reduce PM10 emissions from 333 to 106 ppd during grading.
Mitigation for Air Quality-Regional Emissions: See Construction Mitigation Plan in Final Environmental Impact Report Appendix.			

SUMMARY OF ENVIRONMENTAL IMPACTS BY PROJECT COMPONENT			
Impact Category	**Curb Lane Reconstruction & Peak Period Bus Lane Operation**	**Parking Facilities**	**Downtown Bus Storage & Maintenance Facility**
Construction (continued)			
Air Quality - Carbon Monoxide Hot Spots	Significant. The closure of travel lanes during construction would likely divert traffic to adjacent streets where CO concentrations at nearby intersections currently exceed the state one- or eight-hour CO standards of 20.0 and 9.0 parts per million (ppm).	Less than significant. Construction of the community parking facilities would likely increase CO concentrations at nearby intersections due to construction workers traveling to and from the construction sites. The increase in the number of vehicles on nearby roadways would not be high enough to significantly impact CO concentrations at nearby roadway intersections.	Less than significant impact. Construction of the bus maintenance facility would likely increase CO concentrations at nearby intersections due to construction workers traveling to and from the construction sites. The increase in the number of vehicles on nearby roadways would not be high enough to significantly impact CO concentrations at nearby roadway intersections.
Mitigation for Air Quality - Carbon Monoxide Hot Spots: See Construction Mitigation Plan in the Final Environmental Impact Report Appendix.			
Hazardous Material Discovery and Removal	No impact.	No impact.	Less than significant after mitigation. There is a potential to encounter soil contamination and other hazardous materials during construction of facility. However, this impact would be reduced through mitigation.
Mitigation for Hazardous Material: See Construction Mitigation Plan in the Final Environmental Impact Report Appendix.			
Archaeological and Paleontological Resources	No impact.	No impact.	Less than significant after mitigation through monitoring and recovery of any resources discovered during excavation of facility.
Mitigation for Archaeological/Paleontological Resources: Construction Mitigation Plan in the Final Environmental Impact Report Appendix.			
Effects Determined Not to be Significant (Section 4.0) Discussion applicable to all BRT project elements and no mitigation required for these impact categories since effects are not significant.			
Socioeconomics (Section 4.2)			
Population	Not Significant. BRT could serve to attract additional people to region, however, increase anticipated to be within population projections for region.		
Local Businesses	Beneficial. BRT would provide increased visibility for local businesses, as well as increased number of potential patrons traveling by businesses. On street parking loss in SM discussed in Section 3.3; shelters designed to not obstruct adjacent businesses		
Transit Dependent Populations	Beneficial. Increased capacity of BRT system provides increased accessibility for these populations to potential employment and other activity centers. Transit dependent populations would also experience less delays from use of exclusive lane.		
Land Use/Neighborhoods (Section 4.3)			
Plan and Policy Consistency	Not Significant. Consistent with adopted City of Los Angeles Trasporation Element identifying Wilshire Boulevard as a Transit Corridor, BRT would be consistent with plans and policies by providing higher capacity transit service, although, not as great as those anticipated plans that envisioned extension of Metro Red Line. The BRT project would not be consistent with Beverly Hills goal of a grade-separated system. Inconsistencies are not considered significant and the higher transit capacity provided by the BRT system meets the general intent of the plans.		
Land Use Compatibility	Not Significant. BRT and its project elements would be consistent with the densely developed Wilshire Corridor, surrounding land uses, and existing transit systems that operate along Wilshire Boulevard.		
Community Division	Not Significant. BRT would not introduce any element that would divide existing communities.		
Neighborhood Quality of Life	Beneficial. BRT would provide the opportunity to reduce auto dependence and congestion, and improve air quality. Also, no elements would be disruptive to the existing quality of life given that system is compatible with surrounding uses.		
Accessibility to Community Facilities	Beneficial. BRT would provide increased accessibility to community facilities through provision of high capacity transit system.		

ENVIRONMENTAL IMPACT SUMMARY

SUMMARY OF ENVIRONMENTAL IMPACTS BY PROJECT COMPONENT			
Impact Category	Curb Lane Reconstruction & Peak Period Bus Lane Operation	Parking Facilities	Downtown Bus Storage & Maintenance Facility
Effects Determined Not Significant (Continued)			
Air Quality Operations (Section 4.4)			
Regional Emissions	Not Significant. BRT complies with CFR 40 Part 51, as well as SCAQMD daily operation emission thresholds.		
Carbon Monxide Hot Spot Analysis	Not Significant. CO concentrations at study intersections would not exceed State one- and eight-hour CO Standards.		
Noise and Vibration (Section 4.5)			
Noise	Not Significant. Added buses could increase noise exposure by one decibel or less at all noise-sensitive sites, including high-rise area along Wilshire. Sound reflections would occur between high-rise buildings, these would result in an increase of no more than 1-2 decibels relative to open locations. Buses would not exceed current traffic noise volumes.		
Vibration	No Impact. BRT operates with rubber-tired buses, the same as current condition		
Water Resources (Section 4.6)			
Stormwater Runoff and Flooding	Not Significant. BRT would neither create nor contribute to runoff that would exceed the drainage and flood control capacity of storm drain system, nor would it impede or redirect flood flows. The BRT system would not expose people or property to water-related risks.		
Groundwater	Not Significant. BRT would not result in an increase in impervious surfaces and would not draw from any groundwater aquifer.		
Biological Resources (Section 4.7)			
Local Designated Plant/Animal Species and Communities	Beneficial. The BRT system would not impact threatened or endangered species. Station area landscaping would be installed and the two parking facilities would be landscaped.		
Energy Resources (Section 4.8)			
Use of Non-Renewable Resources in a Wasteful Inefficient Manner	Not Significant. Fuel consumption would be reduced within the project area with Wilshire BRT.		
Community Facilities (Section 4.9)			
Access to Community Facilities	Not Significant. BRT would have minimal disruptive effects to localized circulation near facilities and access to facilities would be enhanced through implementation of higher capacity transit system.		
Displacement of Community Facilities	Not Significant. BRT would not require acquisition of any community facility for implementation therefore no community facilities would be displaced.		
Cultural Resources (Section 4.10)			
Paleontological	No Impact. BRT operations would not involve physical changes to the environment and would operate within existing ROW. Therefore, no impacts to paleontological resources. Potential impacts during construction discussed above under Section 3.8.		
Archaeological	No Impact. BRT operations would not involve physical changes to the environment and would operate within existing ROW. Therefore, no impacts to archaeological resources. Potential impacts during construction discussed above under Section 3.8.		
Historical Resources	No Impact. BRT operations would not involve physical changes to the environment and would operate within existing ROW. Therefore, no impacts to historical resources. Potential impacts during construction discussed above under Section 3.8.		

S-11 Mitigation Measures

Traffic and Circulation

MM 3.2-1. If the dedicated bus lane were to be implemented in the City of Los Angeles, the MTA would assist the City of Los Angeles City Department of Transportation to implement the Advanced Traffic Control System (ATCS) in the Mid-City/Westside Study Area. A total of 433 signalized intersections in the following ATSAC project areas will be upgraded to the ATCS system: Mid-Wilshire, Wilshire-West, Westwood, West Los Angeles, and Santa Monica Freeway-Smart Corridor. Funding will be added to the project budget to finance the ATCS system in this area.

MM 3.2-2. If the dedicated bus lane were to be implemented in the City of Beverly Hills, the MTA would coordinate with the City of Beverly Hills to identify traffic operations improvements, similar to the ATCS system in Los Angeles, to mitigate the impacts of any diversion of traffic from Wilshire Boulevard to alternate arterial streets. Streets, which could be candidates for signal system upgrade, include Olympic Boulevard, North and South Santa Monica Boulevards and Burton Way, with about 23 traffic signals.

MM 3.2-3. If the transit lane were implemented, operational and/or geometric improvements would be implemented to reduce the impacts of the Wilshire BRT: Hauser Boulevard/Sixth Street - Re-stripe northbound approach to a left turn lane and a shared through-right turn lane; Recalibrate signal timing.

MM 3.2-4. If the transit lane were implemented, the following signals would be retimed to reduce delay: Wilshire Boulevard/Federal Avenue/San Vicente Boulevard; Sepulveda Boulevard/Wilshire Boulevard; Gayley Avenue/Wilshire Boulevard; Westwood Boulevard/Santa Monica Boulevard; Glendon Avenue/Wilshire Boulevard; Whittier Drive/Wilshire Boulevard; South Santa Monica Boulevard/Wilshire Boulevard; Spalding Drive/Olympic Boulevard. The following intersections have significantly unavoidable impacts since feasible operational measures considered at these intersections would not mitigate all identified impacts: Westwood Boulevard/Wilshire Boulevard and La Cienega Boulevard/Wilshire Boulevard.

MM 3.2-5. LADOT and City staff in the City of Beverly Hills shall monitor traffic conditions on residential streets adjacent to the Wilshire BRT to determine if the project results in adverse impacts on residential streets. They shall prepare traffic mitigation programs for each impacted neighborhood in coordination with the affected residents. MTA shall include in the project budget funds to reimburse the local jurisdictions for the cost of such monitoring, outreach, and implementation for neighborhood traffic management programs.

Parking

3.3-1. The MTA shall contribute $90,000 to the City of Santa Monica Parking Fund, which the City utilizes to provide public parking in consolidated parking facilities, to offset the loss of nine on-street parking spaces.

Land Acquisition/Displacement and Relocation

MM 3.4-1. Relocation assistance shall be provided to displaced properties per LACMTA policies and procedures.

Visual

MM 3.5-1. All lighting in community parking facilities shall utilize Best Available Technology to reduce spillover to adjacent land uses. In addition, all lighting in community parking lots shall be directed away from adjacent residences, landscaping, or fences, and other measures shall be provided to shield adjacent residences from light and glare produced by light standards and vehicle headlights.

MM 3.5-2. Screening shall be provided at community parking facilities to reduce potential privacy impacts on adjacent residential properties

Geology.

MM 3.6-1. Prior to the final approval of the maintenance yard site, a geotechnical study shall be prepared by a Registered Geologist indicating the design requirements for the site. Identified requirements shall be incorporated into the specifications for the maintenance yard project.

Safety and Security

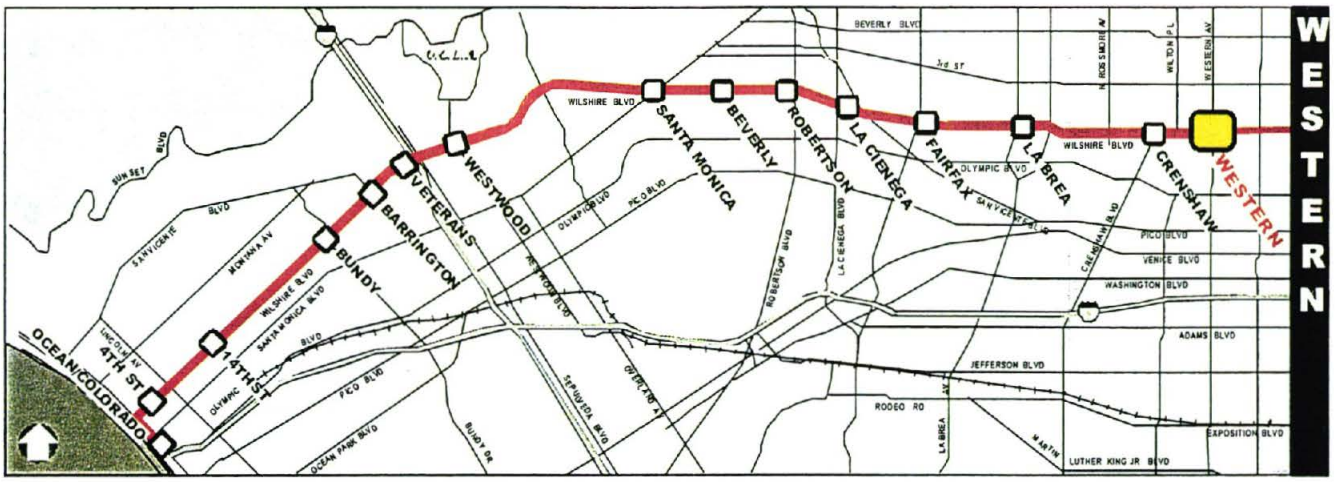
MM 3.7-1. If the peak period transit lane were implemented, subject to local permit approval, new signage shall be installed at signalized pedestrian crossings where the right turn movement for motorists is protected, advising pedestrians to wait for the "walk" signal.

MM 3.7-2. All station areas shall be lighted to provide a safe environment and visibility of the station area from adjacent land uses.

MM 3.7-3. If a special green light phase for the bus is implemented, the LACMTA shall sponsor a pedestrian safety education program, explaining acceptable methods to cross those intersections using BRT signal prioritization.

Construction Impacts

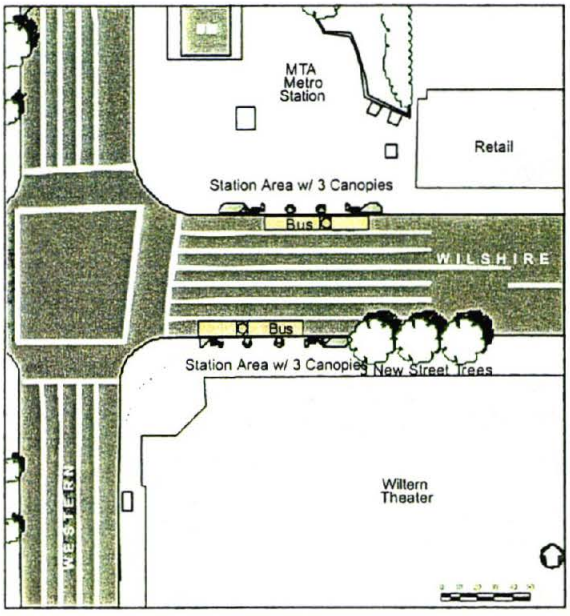
The LACMTA shall implement and enforce the Wilshire Boulevard BRT Construction Mitigation Plan to reduce construction related impacts generated by the reconstruction and repair of the curb lane between Western Avenue and San Vicente Boulevard.



Wilshire/Western Station

The Western Avenue station provides direct access to the MTA Metro Station, with Red Line connections to Hollywood and the new Kodak Theater complex, North Hollywood, Universal City and Studios, downtown Los Angeles, and points beyond. This stop is also located immediately adjacent to the Wiltern Theater, as well as local restaurants, shops, and offices.

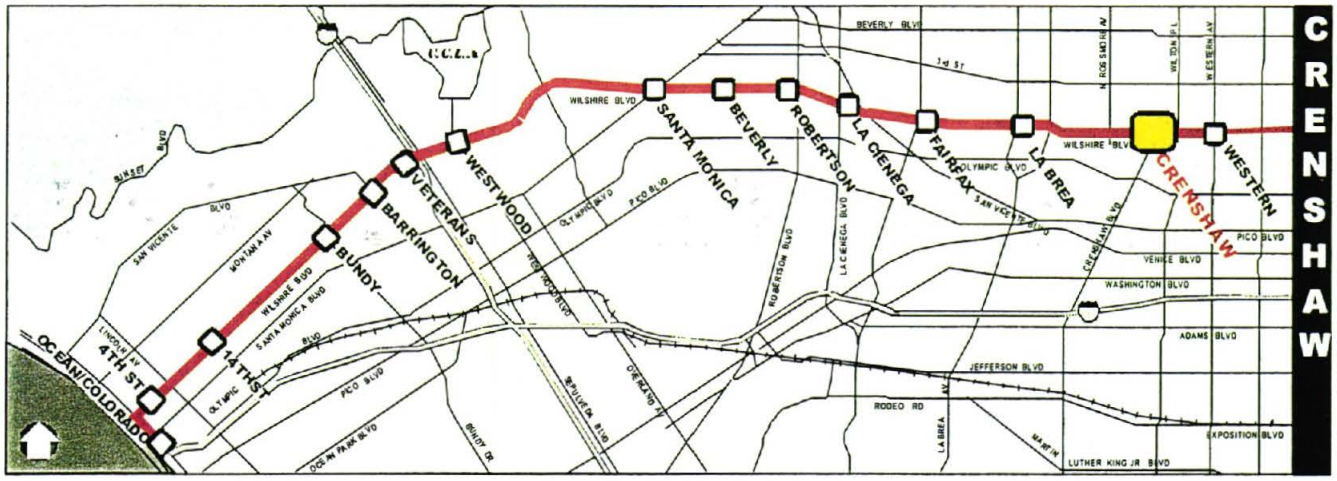




NORTHEAST & SOUTHEAST CORNERS



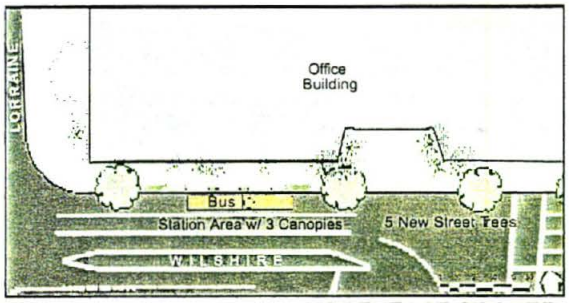
STATIONS



Wilshire/Crenshaw Station

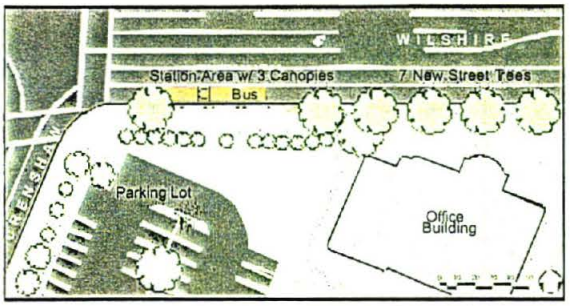
The Crenshaw station is one of two stations located adjacent to an improved Community Parking Facility. This parking facility, located on the southwest corner of Crenshaw and Wilshire, would include 167 parking spaces for the current lessor (LAUSD) and transit riders. The facility would contain a vending kiosk, as well as a well-shaded and landscaped lot. The Crenshaw stop is located near numerous office complexes. The stop also provides access to many residential neighborhoods.



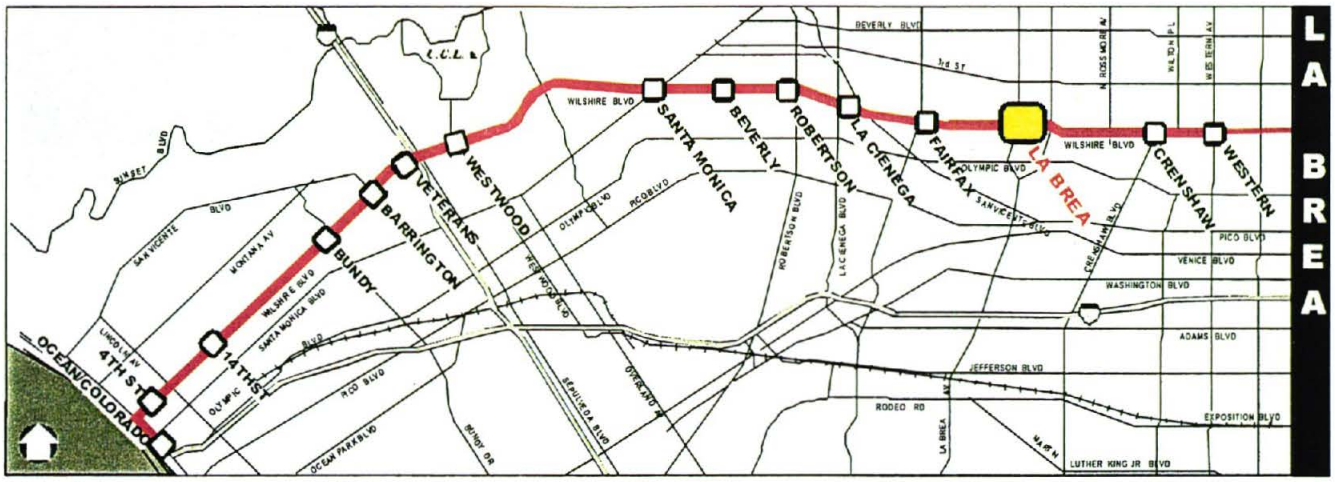


NORTHEAST CORNER



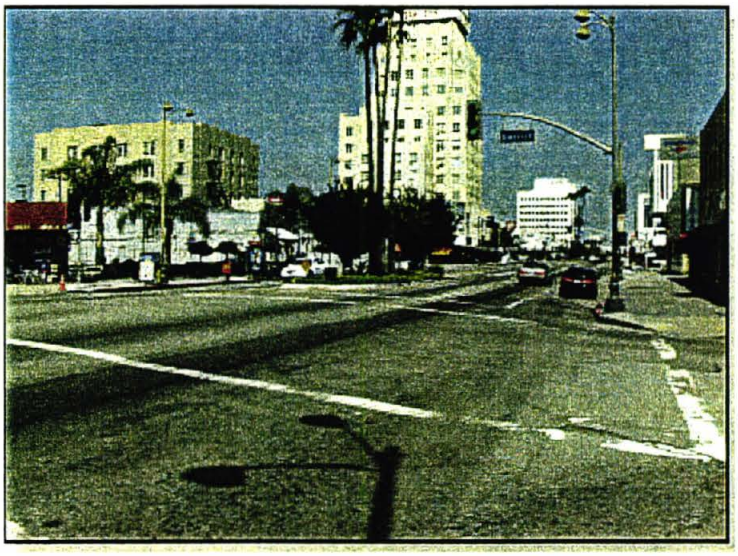


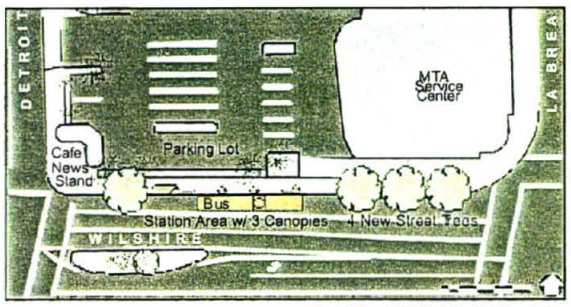
SOUTHEAST CORNER



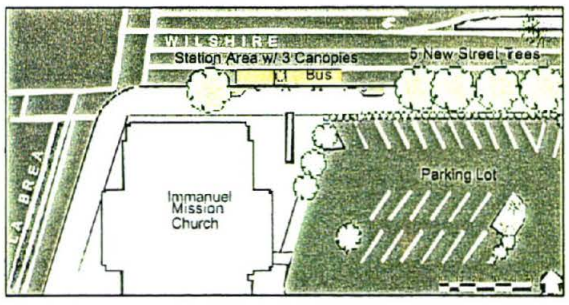
Wilshire/La Brea Station

The La Brea station is one of the two stations located adjacent to an improved Community Parking Facility. The parking facility planned at this location would enhance the appearance of the existing site through landscaping and repaving. The existing newsstand and MTA Service Center would remain. Beyond these immediate uses, this station stop would provide access to shopping and restaurants located along La Brea, the Immanuel Mission Church on the southeast corner, and numerous offices.





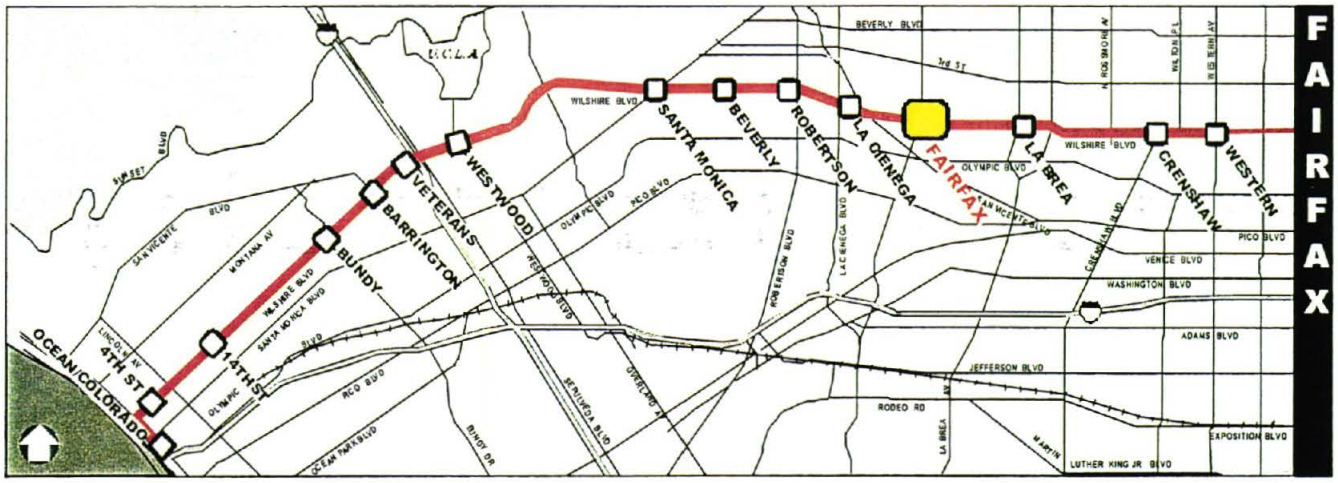
NORTHWEST CORNER



SOUTHEAST CORNER



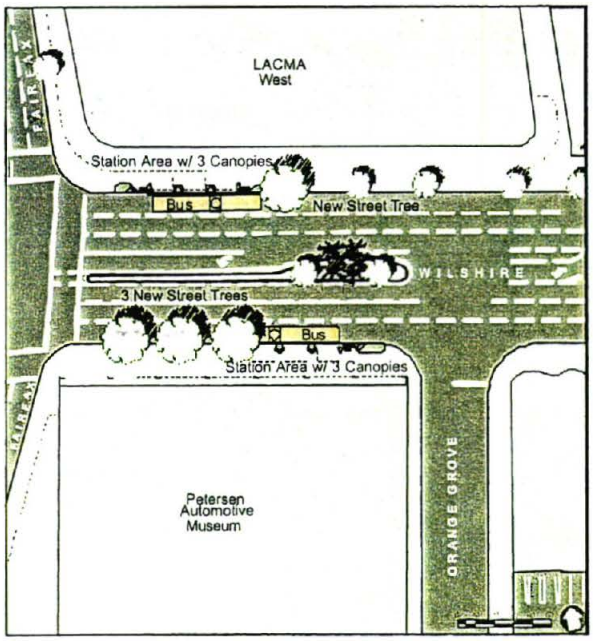
STATIONS



Wilshire/Fairfax Station

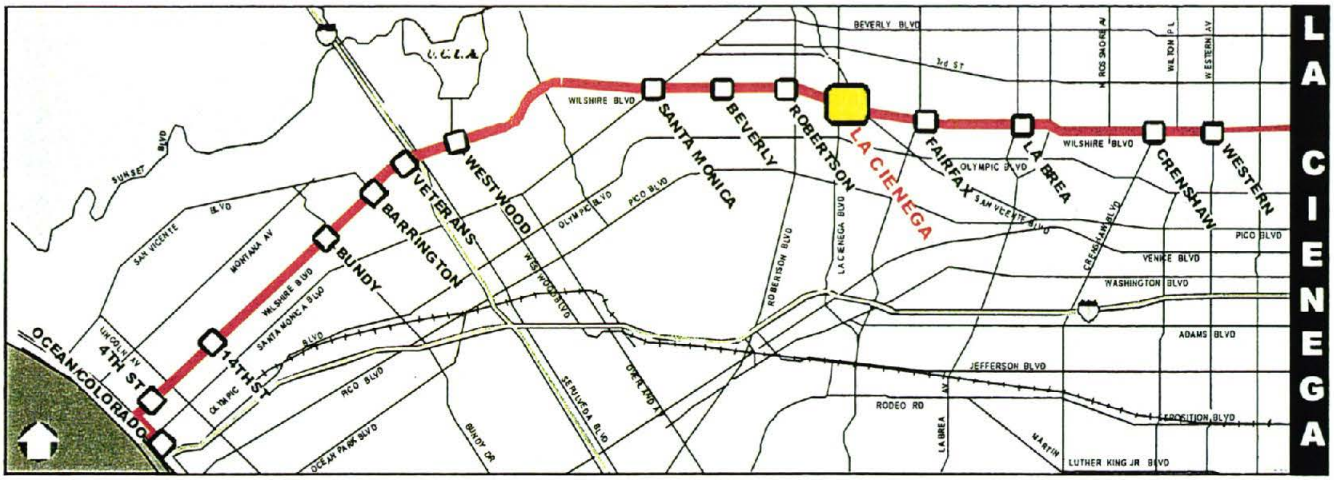
The Fairfax station provides direct access to the many museums and tourist attractions of the Miracle Mile area: the Los Angeles County Museum of Art, the Petersen Automotive Museum, Los Angeles Craft and Folk Art Museum, La Brea Tar Pits, and the Page Museum. This station also provides access to the newly completed shopping complex, The Grove, and the Farmer's Market. Also accessible by this station are numerous small businesses, restaurants, and offices.







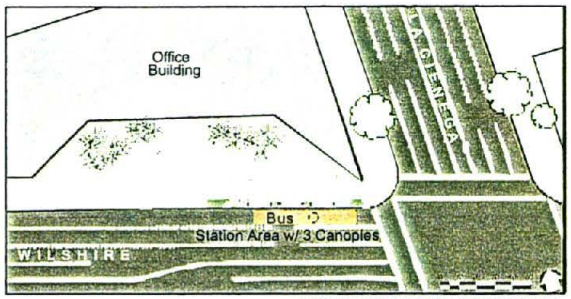
NORTHEAST & SOUTHEAST CORNERS



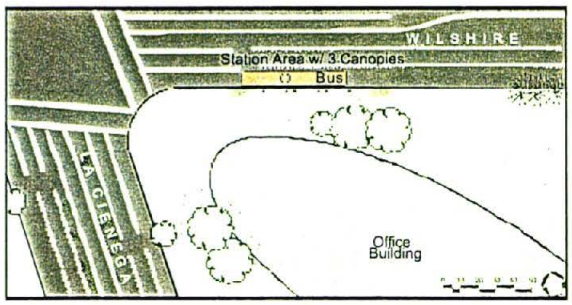
Wilshire/La Cienega Station

The La Cienega station is located in the heart of "Restaurant Row," which fronts both sides of La Cienega Boulevard north and south of Wilshire. This station also provides access via La Cienega to the Beverly Center shopping mall, as well as the numerous shops and restaurants surrounding the Beverly Center. The La Cienega station also provides access to the many office buildings in the immediate vicinity.





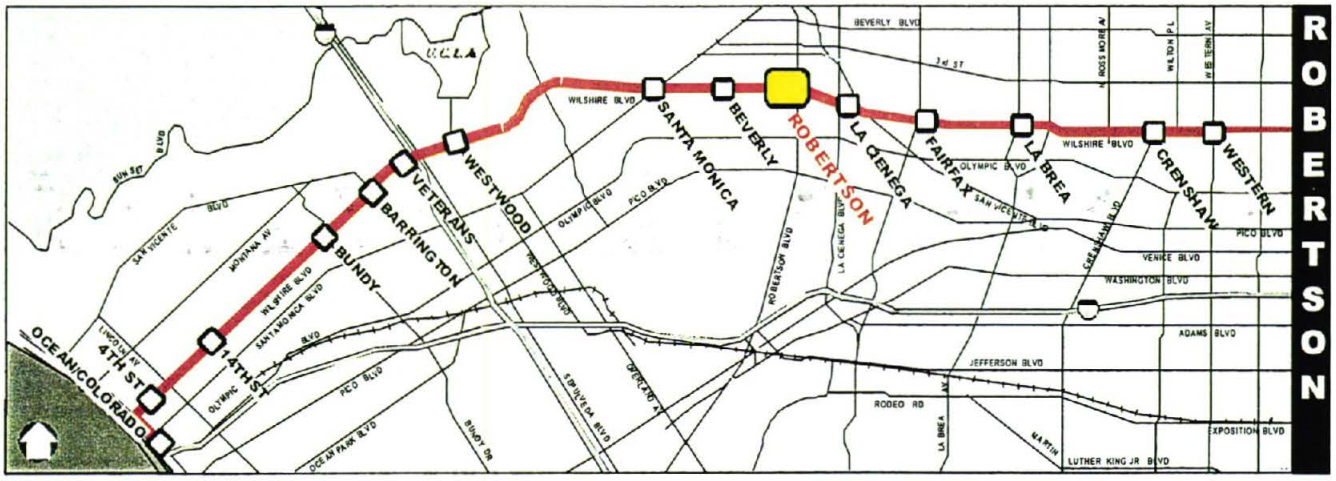
NORTHWEST CORNER



SOUTHEAST CORNER

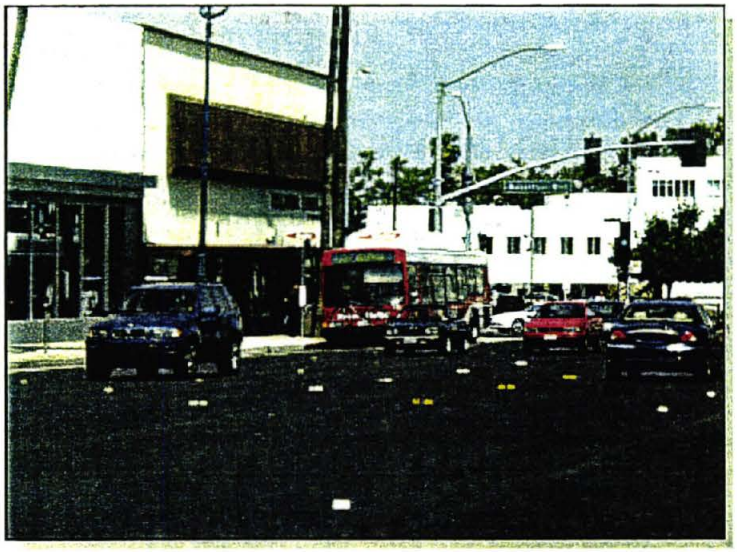


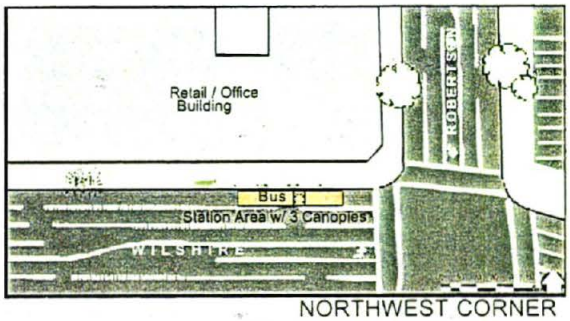
STATIONS



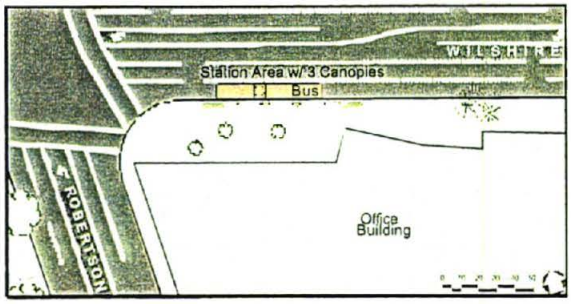
Wilshire/Robertson Station

The Robertson station provides access to the Beverly Center shopping complex, located north of Wilshire. The station also provides connections to the Cedars Sinai medical facility, as well as the ancillary medical offices surrounding this hospital. Also in the area of this station are the numerous design shops lining both sides of Robertson Boulevard, and the residential and office buildings located along both Robertson and Wilshire.



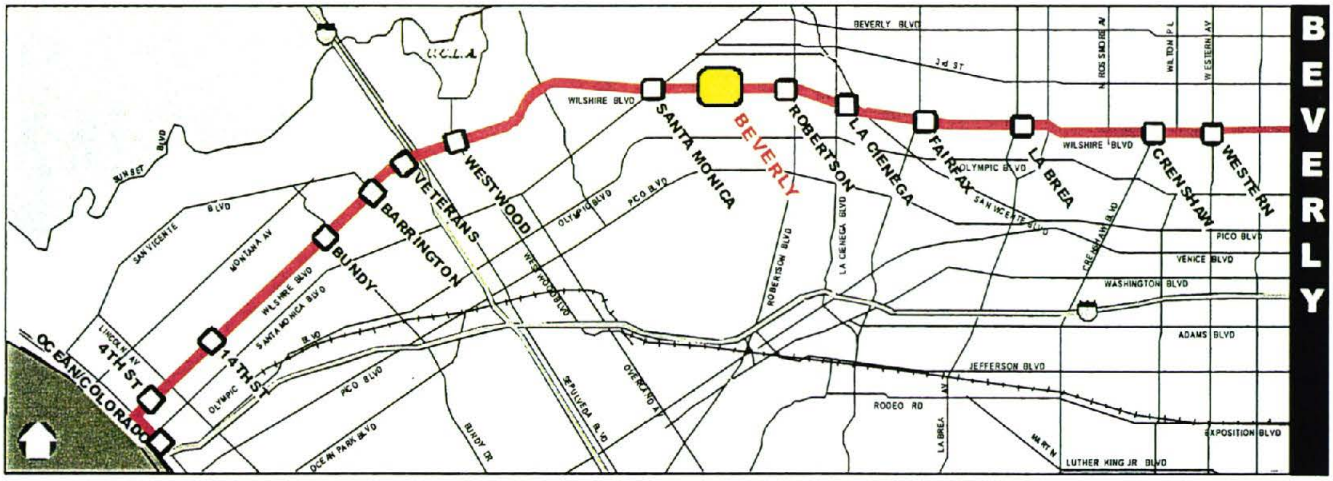


NORTHWEST CORNER



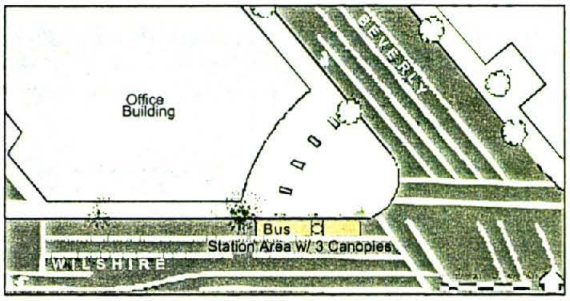
SOUTHEAST CORNER



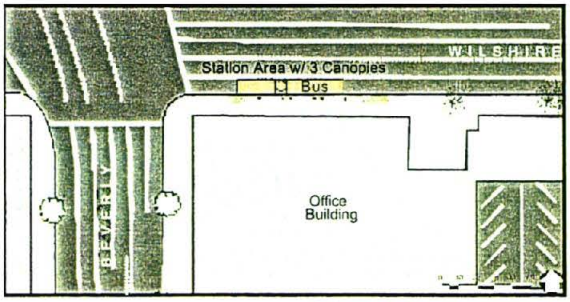


Wilshire/Beverly Station

The Beverly station is located in the heart of downtown Beverly Hills adjacent to the Golden Triangle area filled with world famous shopping, fine dining establishments, and numerous office buildings, all within easy walking distance of this stop. Also within a few blocks of this station is the Beverly Hills Civic Center, and a large number of residences. Lining both sides of Wilshire Boulevard near this station are several world-class hotels and many more department stores.



NORTHWEST CORNER

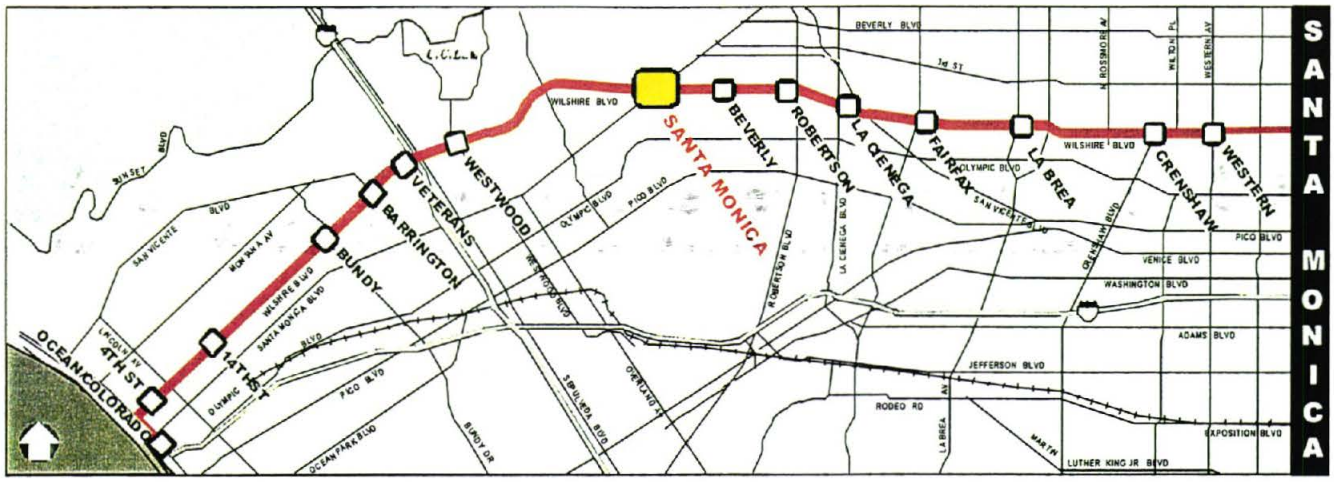


SOUTHEAST CORNER





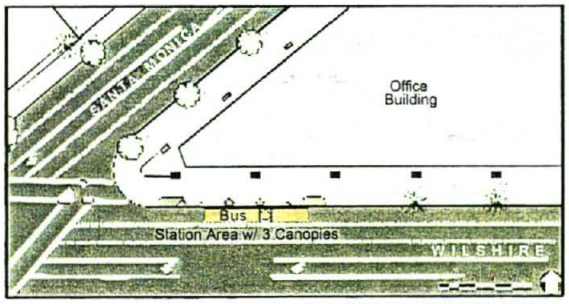
STATIONS



Wilshire/Santa Monica Station

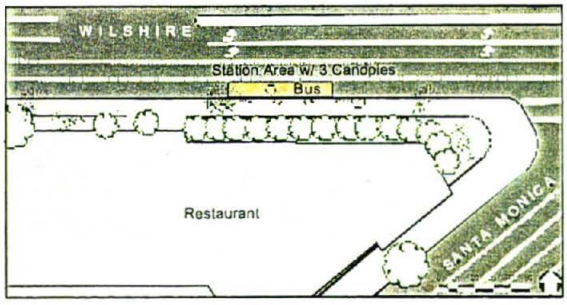
The Santa Monica Boulevard station is located at a point of transition between Beverly Hills and West Los Angeles, providing access to the Beverly Hills Triangle to the east, with its numerous shops, restaurants, offices, and hotels. This station also provides connections to the City of West Hollywood, located east along Santa Monica Boulevard, and to the Century City office complexes located to the west along Santa Monica.



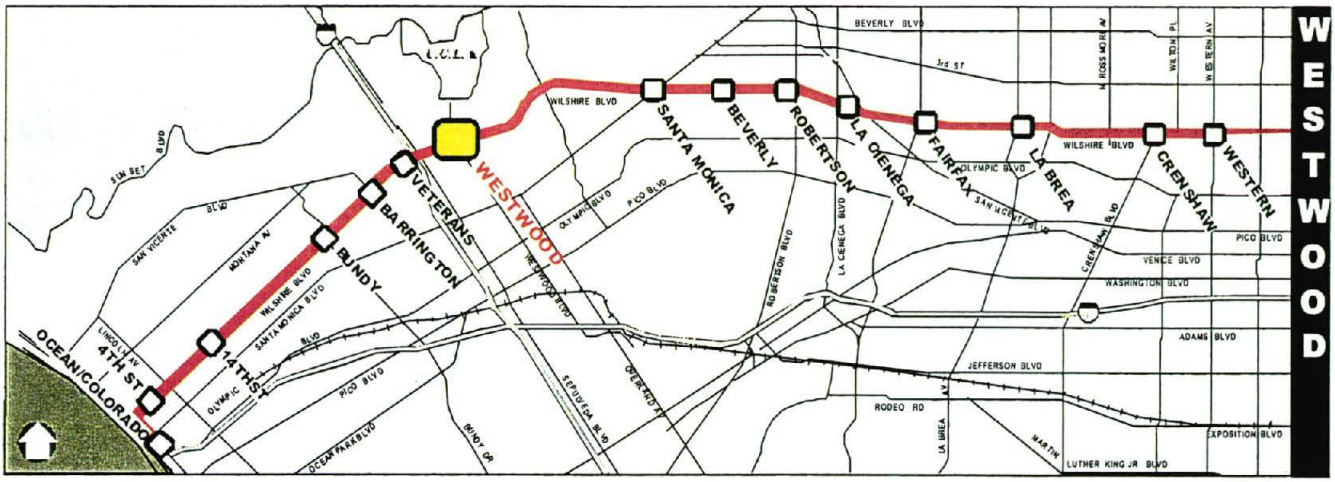


NORTHEAST CORNER





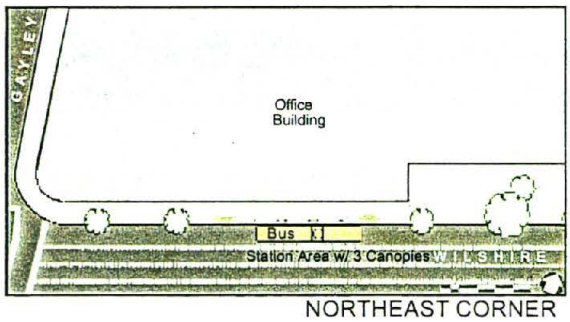
SOUTHWEST CORNER



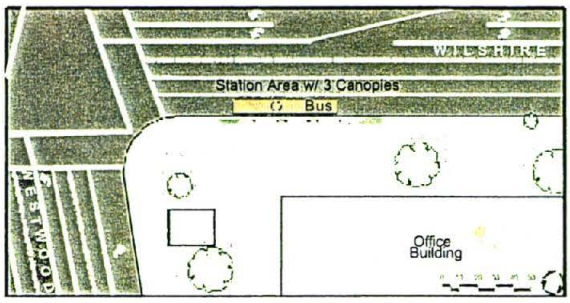
Wilshire/Westwood Station

The Westwood station is located in the heart of Westwood Village, located north of Wilshire Boulevard, as well as the many office towers located along both sides of Wilshire east and west of Westwood Boulevard. This station also provides connections to the UCLA campus, the UCLA Hammer Museum, and the Federal Building. Also within easy walking distance of the station are numerous apartment and condominium complexes.





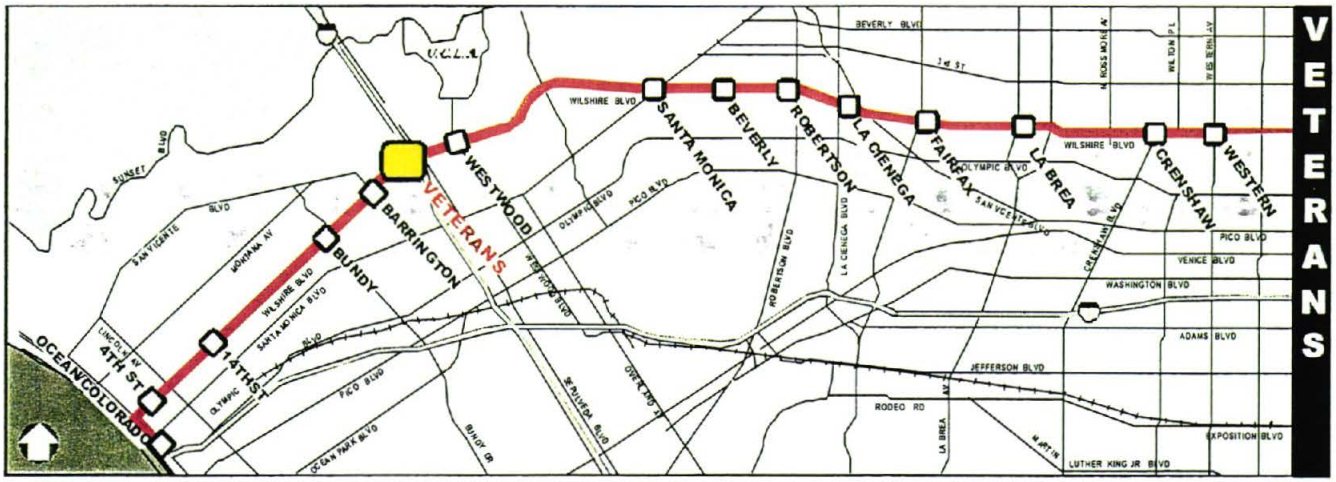
NORTHEAST CORNER



SOUTHEAST CORNER



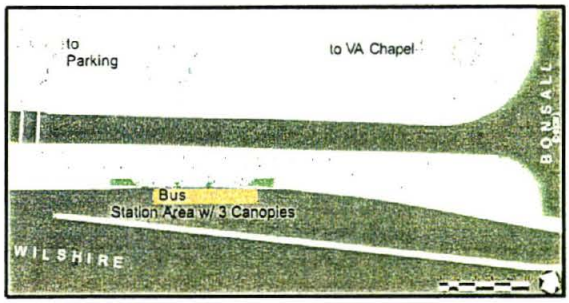
STATIONS



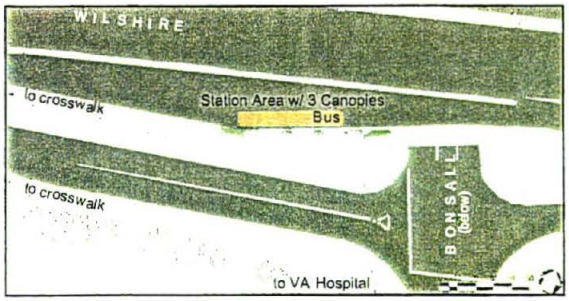
Wilshire/V.A. Hospital Station

The Veterans station is located at the Veteran's Administration complex in West Los Angeles. The northern portion of the property contains the Wadsworth Theater and numerous facilities associated with the Veteran's Administration. The southern portion of the site contains the VA Hospital. This station is also immediately adjacent to the I-405 Freeway, providing connections to the San Fernando Valley, and the Getty Museum and Skirball Cultural Center within the Sepulveda Pass.



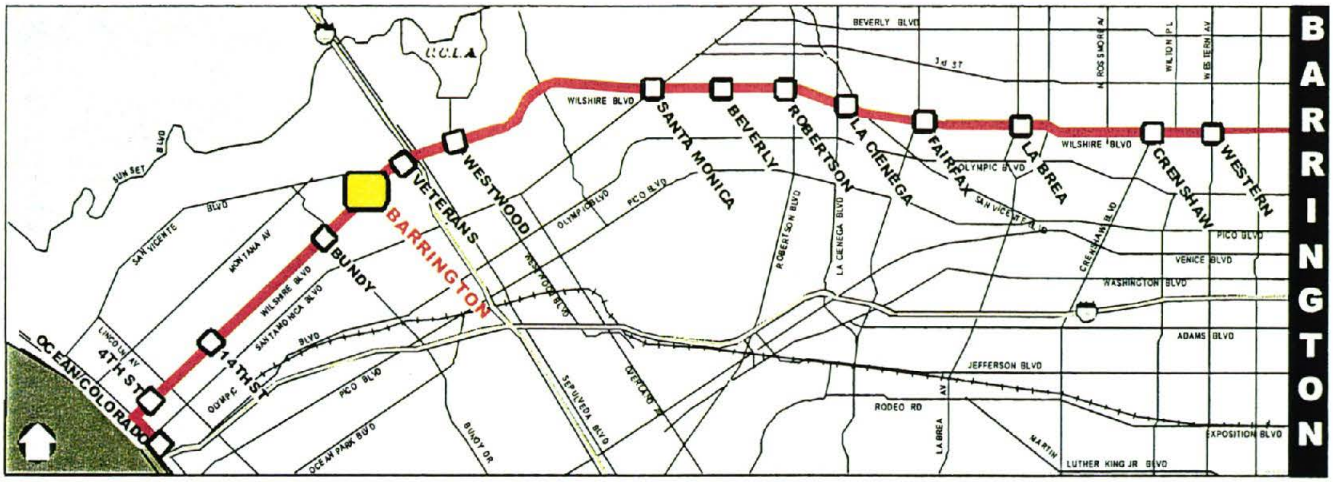


NORTHSIDE OF WILSHIRE



SOUTHSIDE OF WILSHIRE

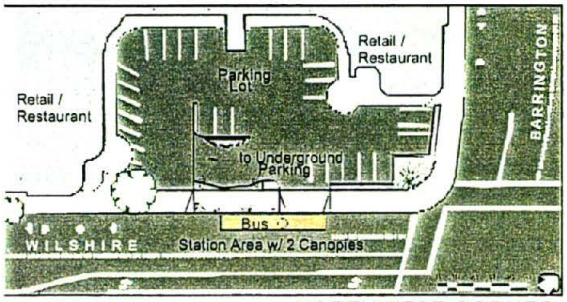




Wilshire/Barrington Station

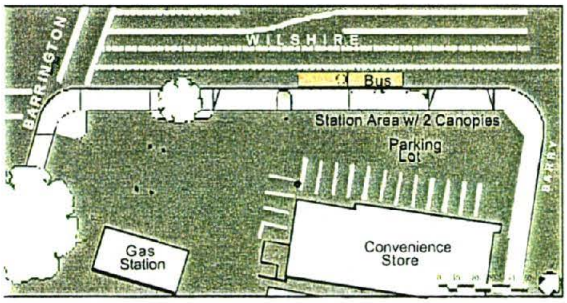
The Barrington station is one of two stations located within this densely commercial stretch of Wilshire Boulevard, with numerous high-rise office buildings, shops, and restaurants. This is also one of two stations providing direct access to the densely populated Brentwood neighborhoods between San Vicente and Wilshire Boulevards, as well as the many residential areas south of Wilshire. This station also provides access to the commercial areas of Brentwood along San Vicente, with its numerous shops, restaurants, and offices.





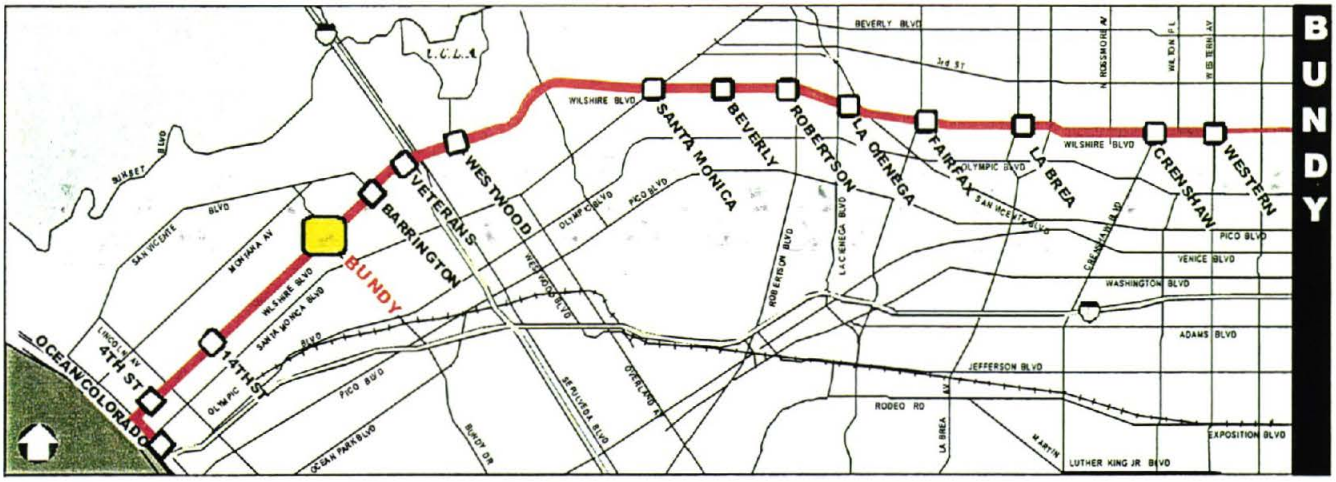
NORTHWEST CORNER





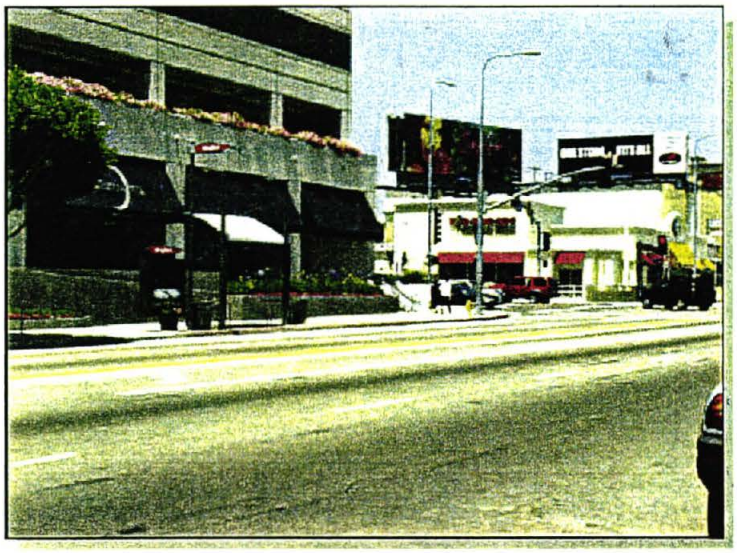
SOUTHEAST CORNER

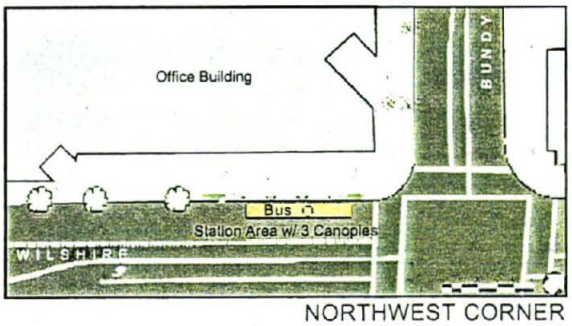
STATIONS



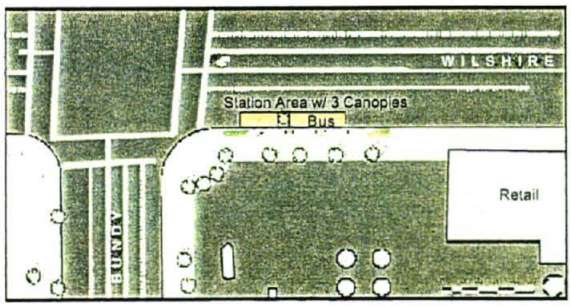
Wilshire/Bundy Station

The Bundy station provides access to this densely commercial area of Wilshire Boulevard, which has high-rise office complexes on both sides of the street. The Bundy station also provides access to the numerous apartments and condominiums north in the Brentwood community and south in West Los Angeles. Bundy also provides access to the commercial area along San Vicente, with restaurants, retail, and offices uses.



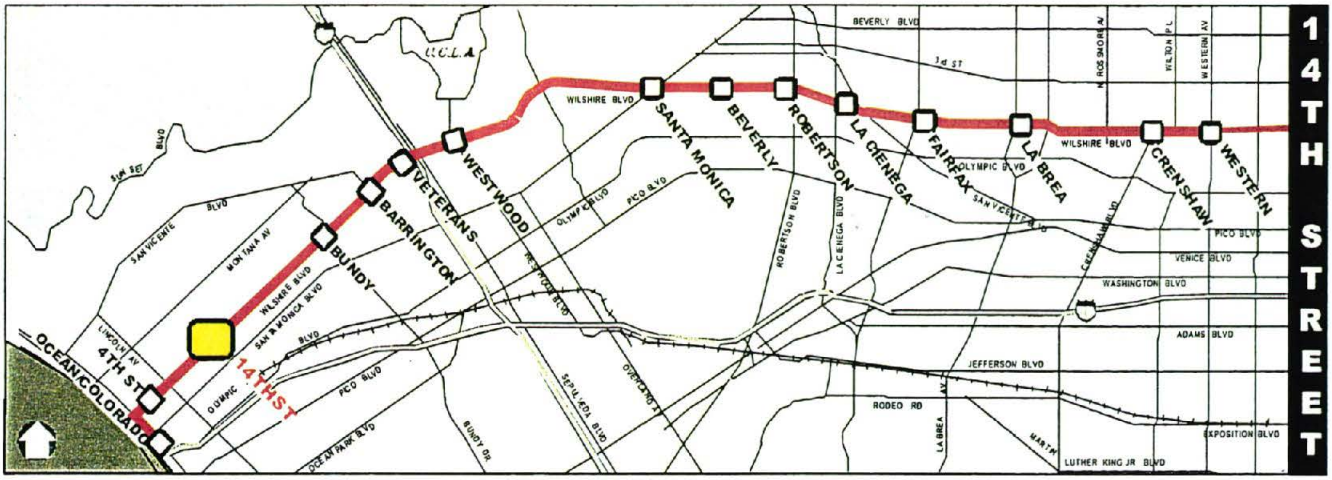


NORTHWEST CORNER



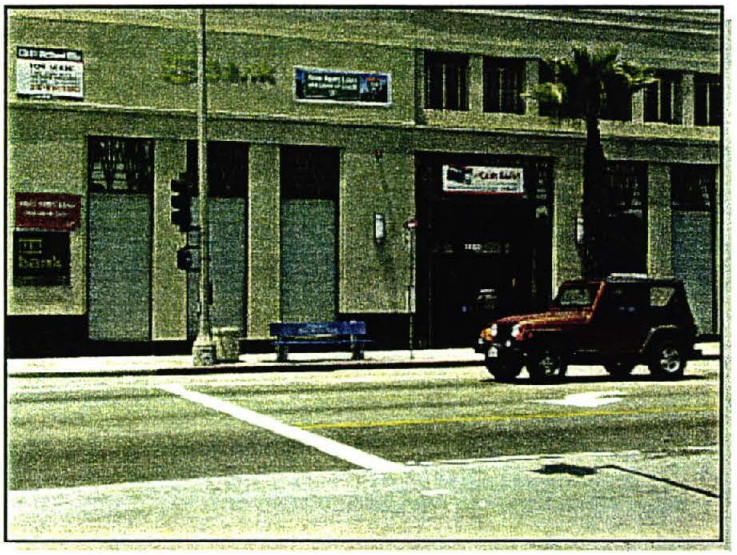
SOUTHEAST CORNER

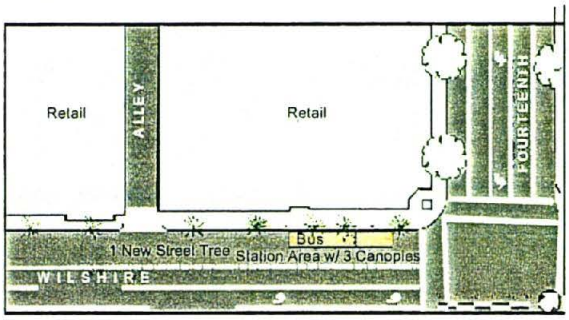




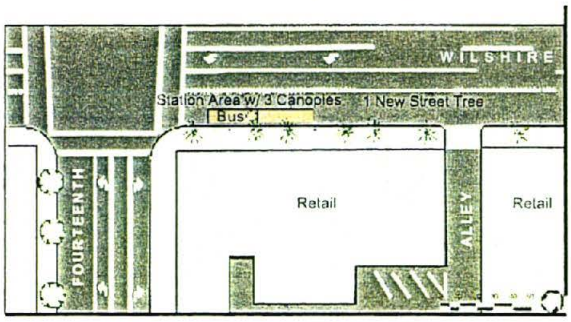
Wilshire/14th Station

One of three stations within the City of Santa Monica, the 14th Street station provides access to numerous low-scale shops, office buildings, and restaurants. The station is also located in the vicinity of the St. John's medical complex, as well as the numerous medical facilities supporting this hospital. The 14th Street station is within easy walking distance of many single-family and multi-family residential neighborhoods.





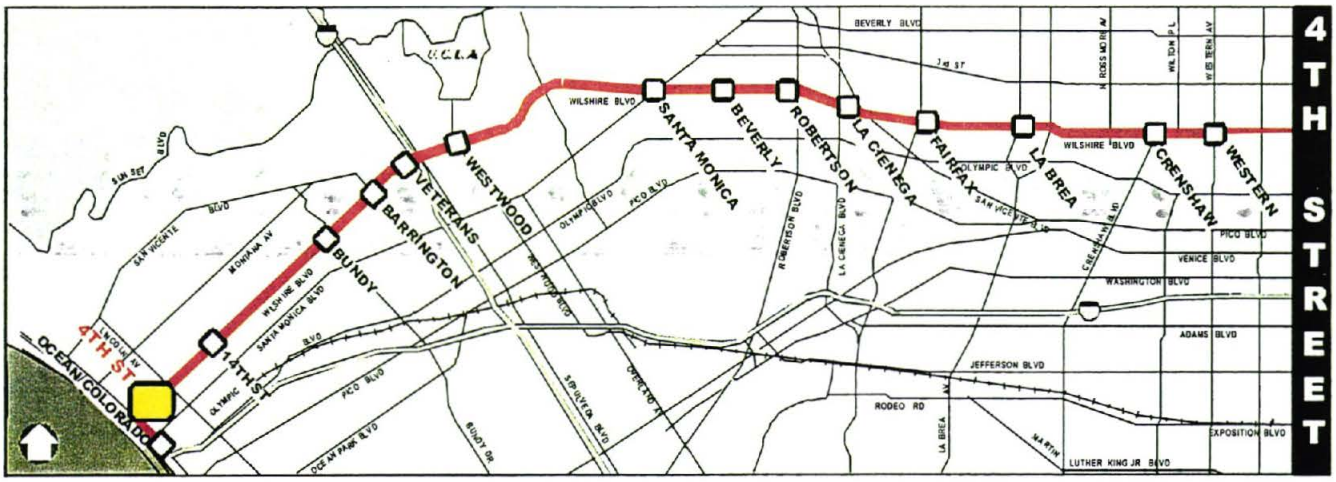
NORTHWEST CORNER



SOUTHEAST CORNER

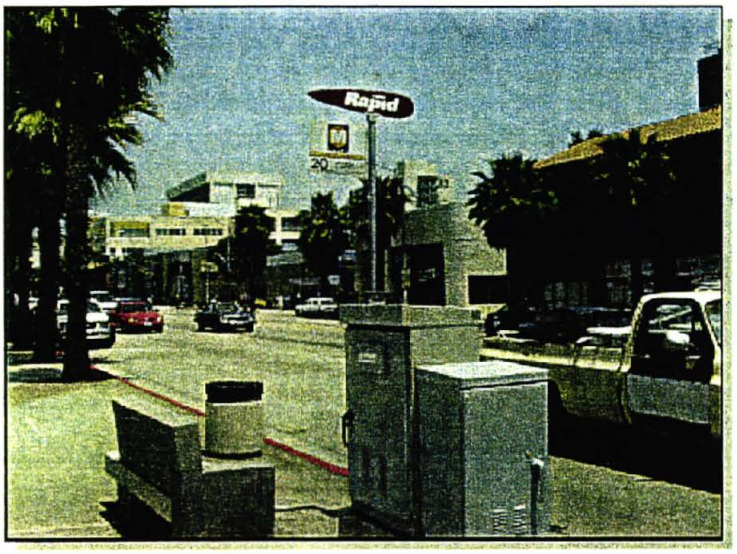


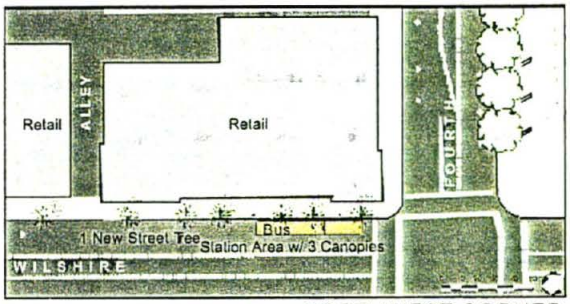
STATIONS



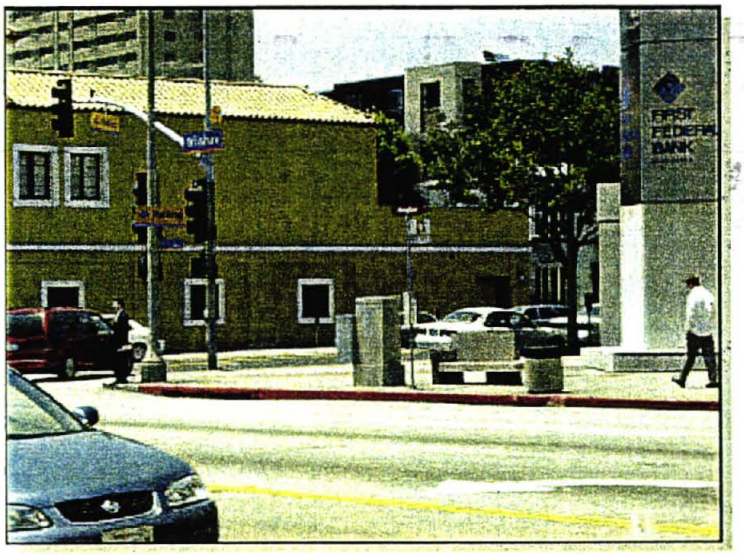
Wilshire/4th Station

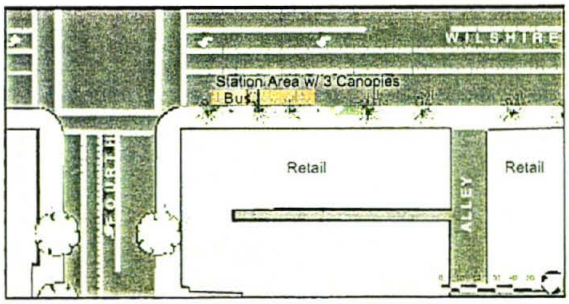
The 4th Street station is located within walking distance of some of Santa Monica's key destinations: the Third Street Promenade, the Santa Monica Pier and the beach, and the Palisades Park. This station also provides direct access to numerous hotels in the vicinity, many office buildings, and an abundance of retail shops and restaurants. This station is also in close proximity to the shopping area located to the north along Montana Avenue, as well as to the south at the Santa Monica Place shopping mall.



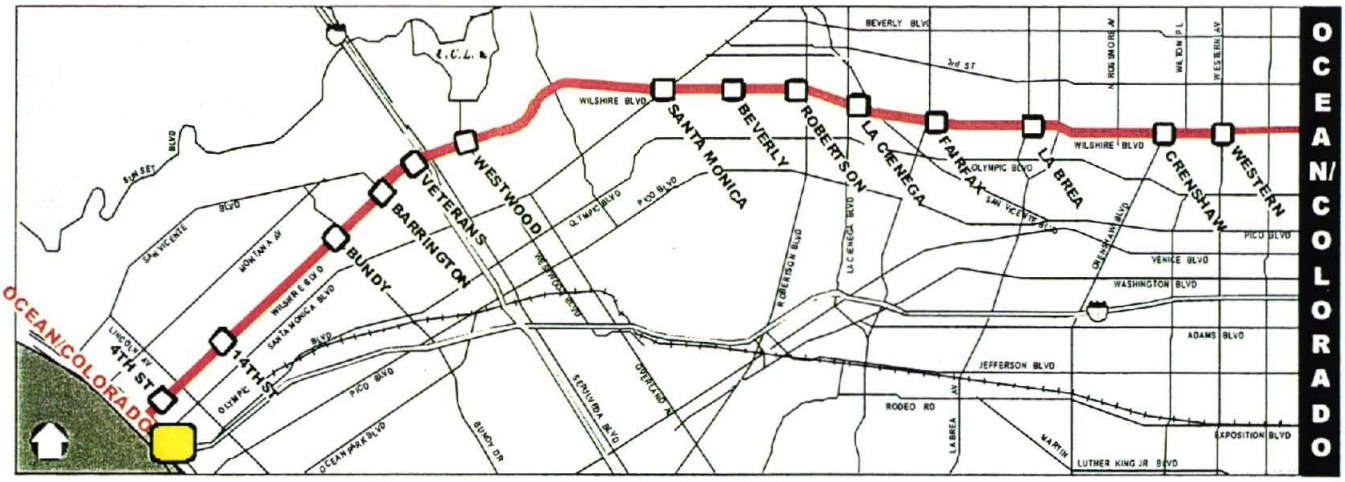


NORTHWEST CORNER





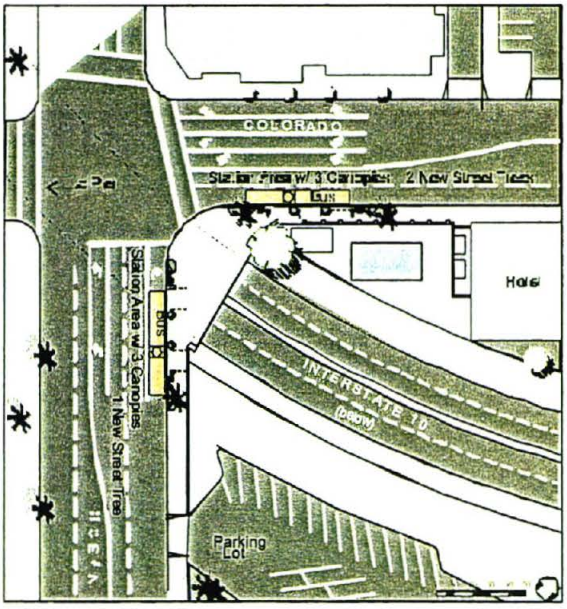
SOUTHEAST CORNER



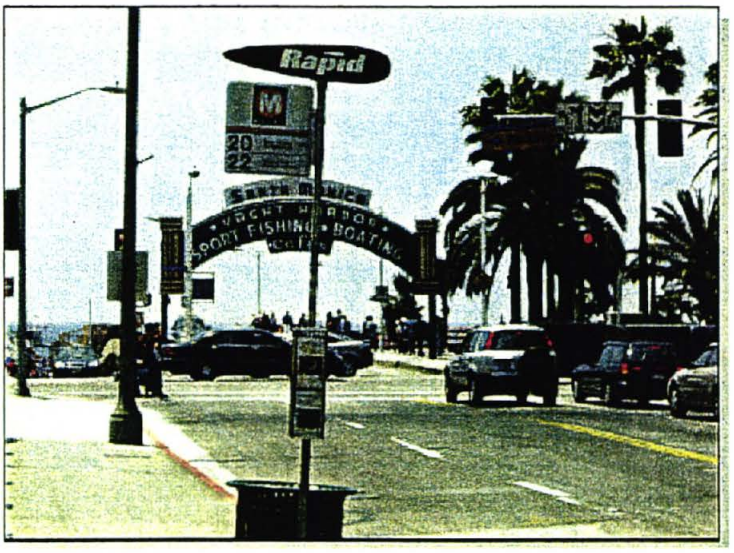
Ocean/Colorado Station

The Ocean and Colorado station provides access to the City of Santa Monica's Transit Mall and Transit Center. This station also provides access to the Palisades Park, overlooking the Santa Monica Pier and beaches, as well as to the myriad of shopping within easy walking distance at the Santa Monica Place mall and the Third Street Promenade. In addition, this station provides access to the Santa Monica Civic Center and the corporate headquarters of the Rand Corporation.

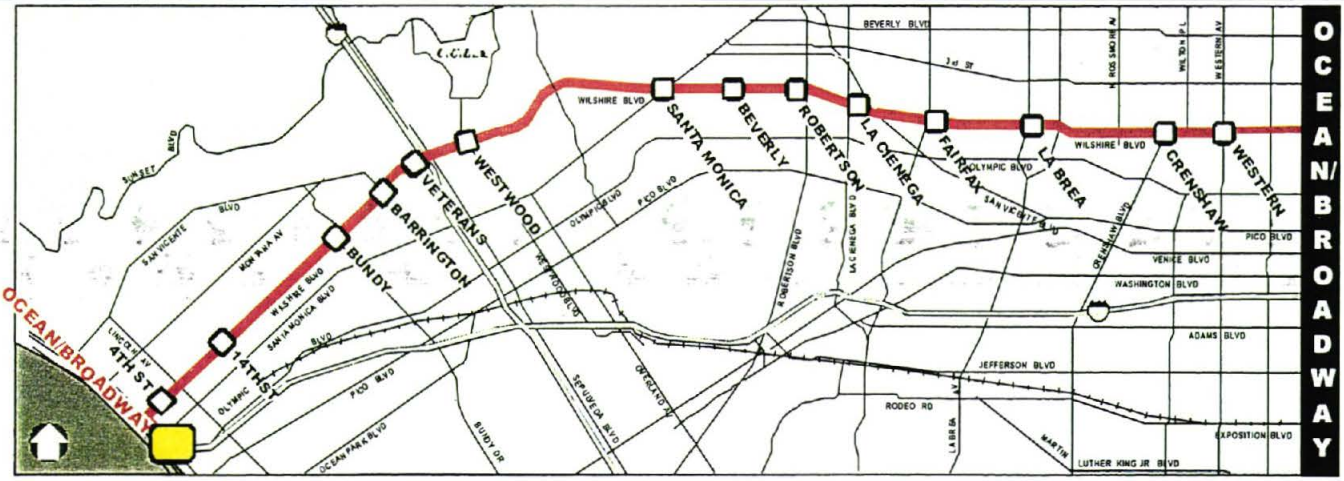




SOUTHEAST CORNER

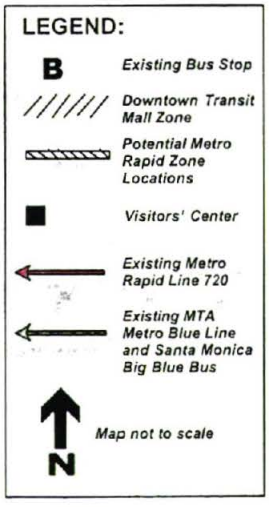


STATIONS



Optional Station Site - Ocean/Broadway Station

The City of Santa Monica has recently opened a transit mall on Broadway and Santa Monica Boulevard. During community outreach meetings, a number of local business interests have asked if the end-of-line Metro Rapid Station at Ocean/Colorado could be supplemented or moved to a location closer to the new transit mall. Potential locations for this station are illustrated here. As station ownership and maintenance are the responsibility of each city, the MTA would consider the addition of an Ocean/Broadway Station or a relocation of the Ocean/Colorado Station, if such a site were deemed acceptable by the City.





1.0 HISTORY/PURPOSE AND NEED

1.1 INTRODUCTION

This section provides a history and background of the events and actions that have led to the evaluation of the alternatives considered in this Final EIR. In addition, this section provides the purpose and need for transit service in the Mid-City/Westside area of Los Angeles (hereafter referred to as the Study Area or the Mid-City/Westside Study Area). For a detailed description of alternatives considered, the reader is referred to Section 2.0, immediately following this chapter.

1.2 BACKGROUND AND HISTORY

The need for high-capacity transit service improvements has been long recognized in the Mid-City/Westside area. Since the 1970s, the Metropolitan Transit Authority (MTA) and its predecessors, the Southern California Rapid Transit District (SCRTD) and the Los Angeles County Transportation Commission (LACTC), have described numerous transportation planning and environmental impact studies that have established the need for, and the environmental impacts resulting from, improved east/west-oriented transit service in various parts of the Study Area.

Several planning and environmental studies prepared in the late 1980s and early 1990s identified the potential for the westward extension of the Metro Red Line system, which currently terminates at the intersection of Wilshire Boulevard and Western Avenue.

The Exposition Right-of-Way (ROW) was initially included in the Study and was analyzed in the Draft Environmental Impact Statement/Report (Draft EIS/EIR); however, the Exposition Project will not be discussed in this document. Since circulation of the Draft EIS/EIR, the MTA Board of Directors has elected to separate the study into two distinct projects: the Wilshire Bus Rapid Transit (BRT) Project and the Exposition Light Rail Transit (LRT) Project. The Exposition Project will be analyzed separately in a future EIR, and only an analysis pertaining to the Wilshire Boulevard Corridor is set forth below.

1.2.1 Mid-City/Westside Studies

The original Locally Preferred Alternative (LPA), adopted in 1983 for the Mid-City/Westside Study Area, was an 18.6-mile heavy rail subway line extending from Los Angeles Union Station to North Hollywood. Due to budget constraints, the Urban Mass Transit Administration (UMTA), precursor to the present-day Federal Transit Administration (FTA), was unable to provide funding for the entire LPA alignment. In 1984, a 4.4-mile minimum operating segment (MOS), extending from Union Station to a station at Wilshire/Alvarado, was chosen and a full funding contract for this segment was signed into legislation on December 19, 1985. Construction of this segment began in 1986.

In 1985, a naturally occurring methane gas fire at a Ross Dress For Less store, located along the selected LPA alignment, resulted in an investigation by a special City of Los Angeles Task Force. Conclusions from this investigation lead to a Congressional prohibition on future federal funding for subway construction within the designated Methane Gas Risk Zone, as determined by the Task Force's 1985 report on subsurface conditions the risk zone includes the Wilshire Boulevard region from approximately Western to San Vicente. As mandated by the Congressional prohibition, a Congressionally Ordered Re-Engineering (CORE) study was conducted. The goal of this study was to determine an appropriate alignment through which to link the Los Angeles Central Business District, the San Fernando Valley, and the Wilshire Corridor. Over 40 candidate alignments were reviewed and six alignments studied in detailed environmental reports.

In July 1988, a new LPA was chosen. This new LPA, building from the previously adopted MOS, would travel from Los Angeles Union Station to Wilshire Boulevard/Vermont Avenue and then split into two separate lines, one traveling west to Wilshire Boulevard/Western Avenue and the other proceeding north to Hollywood and North Hollywood. The branch to Wilshire/Western was opened in 1996. The branch to North Hollywood was opened for service in June 2000.

The 1990 approval of Proposition C created a new local funding source for Southern California Rapid Transit District (SCRTD). Further study of a Metro Red Line extension to the west was conducted in 1992. The adopted LPA identified in the 1992 Final Supplemental Environmental Impact Statement/Final Supplemental Environmental Impact Report (FSEIS/FSEIR) for the Mid-Cities segment showed the construction of a subway extending from the existing Wilshire/Western station to Pico/San Vicente.

In 1993, geotechnical tests conducted to provide detailed information concerning the nature and extent of hydrogen sulfide gas along the Mid-City Segment LPA alignment found concentrations much higher than preliminary tests had identified. This discovery prompted the 1994 *Metro Red Line Segment 3/Mid-City Extension Reassessment Study* that identified possible vertical alternative alignments for the LPA to mitigate impacts from hydrogen sulfide gas. The conclusions of this study initiated a new Supplemental Environmental Impact Statement/Supplemental Environmental Impact Report (SEIS/SEIR) in 1996 to assess the environmental impacts of shallow cut-and-cover and aerial configurations along the original Crenshaw Boulevard alignment.

The environmental process determined that the impacts of this alignment were highly negative to the community. In an effort to mitigate these impacts, the March 1996 *Mid-City Alternative Alignment Gas Exploration Study* was conducted to investigate a deep-bore tunneling option along the Wilton Place/Arlington Avenue alignment, approximately one-quarter mile east of the current LPA. Results of geotechnical tests conducted along this alignment showed significantly lower hydrogen sulfide levels. As a result, the 1996 Draft SEIS/SEIR for the Mid-City Segment added a Wilton/Arlington alignment.

In 1998, MTA conducted a restructuring plan to document its ability to complete the North Hollywood rail construction and meet the terms of the Bus Consent Decree adopted by the MTA Board of Directors on May 13, 1998. The FTA approved this restructuring plan on July 2, 1998. The plan documented that MTA did not have sufficient local matching funds to finance heavy rail subway projects in the Eastside and Mid-City study areas that

were necessary to meet the requirements of the original Full Funding Grant Agreements for these projects. Subsequently, work on these projects was suspended. As a provision of this plan, MTA was to study "viable and effective options" throughout Los Angeles County, emphasizing study areas containing suspended heavy rail projects.

1.2.2 Additional Mid-City/Westside Studies

Several additional studies have been conducted within the Mid-City/Westside Study Area. These studies range in scope from system-wide analyses to alternatives available for a particular corridor all the way to options associated with specific modes of transportation.

■ Systemwide Studies

To evaluate new fixed guideway projects, the MTA conducted the Regional Transit Alternatives Analysis (RTAA) Study. The RTAA Study accomplished several important objectives for the MTA. First, the RTAA study identified the amount of funding available for new projects between fiscal year 1999 and fiscal year 2004. Secondly, it developed several funding allocations and established a framework for further fixed guideway development within the Eastside, Mid-City/Westside, and San Fernando Valley study areas. Finally, the study provided a preliminary evaluation of fixed guideway alternatives in the three Study Areas and recommended that a Major Investment Study be conducted to provide more detailed information regarding these alternatives.

On November 9, 1998, the results of the RTAA study were presented to the MTA Board. The Board approved the recommended rapid bus plan, which would be conducted in a demonstration project for three rapid bus lines serving the Eastside, Mid-City/Westside, and San Fernando Valley Study Areas. The Board also reaffirmed its commitment to fund fixed guideway transit improvements in the suspended rail corridors. Also, a funding commitment of $220 million through FY 2004 was made a priority for the Eastside and Mid-City/Westside Study Areas.

As a necessary parallel step in obtaining greater flexibility in project definition for the Eastside and Mid-City/Westside Study Areas, the MTA sought to expand the definition of Segment 3 of the Metro Red Line, which was defined in both the Intermodal Surface Transportation & Efficiency Act (ISTEA) and the Segment 3 Full Funding Grant Agreement as "heavy rail subway." With the cooperation and assistance of the Los Angeles congressional delegation, the MTA obtained revised definitional language in the Transportation Equity Act for the Twenty-first Century (TEA-21), which was signed into law by the President on June 9, 1998. This was done with the specific intent of being able to utilize the Segment 3 funding balance in the future for any type of fixed guideway project in the Westside and Mid-City Study Areas. The TEA-21 legislation expanded the definition of the Segment 3 project to include "any fixed guideway project" (not just heavy rail subway) in the transportation corridors to be served by the three extensions of Segment 3. It also authorized the beginning of final design phase and construction for the Segment 3 project during the fiscal year 1998/2003 funding cycle under Section 5309 (new starts funding).

The second legislative action was the passage of the Proposition A Ballot Initiative. Voters approved this new County law on November 3, 1998. This initiative contained the provision that County sales tax revenues for Proposition A and Proposition C could not be utilized in funding the cost of planning, design, construction, or operation of any "New Subway." New Subway was defined as any subway other than the Metro Red Line Segments #1, 2, or 3 (North Hollywood). Under this initiative, sales tax revenues cannot be used to fund subway development in the Westside or Mid-City/Westside study areas. The initiative does not prohibit the use of sales tax revenue to develop light-rail, at-grade-rail, elevated rail systems, or busways in either of these study areas. Also, the initiative does not prevent the use of State, federal, or local revenues other than sales tax to design, construct, or operate a New Subway in either area.

■ Mode-Specific Studies

The 1999 *Mid-City Bus Transit Restructuring Study* was a follow-up to the 1993 Inner City Transit Needs Assessment Study and contained the goal of increasing ridership, operations, and integration while improving cost-efficiency and cost-effectiveness of the transit system. Study area boundaries for this study were the Century Freeway (I-105), Pacific Ocean/La Cienega Boulevard, Slauson Avenue/Marina Freeway, and Alameda Street. This study recommended that a three-tier restructuring strategy be implemented that would address the needs of the following service sectors: core service on basic routes; inter-community connectors; and local shuttles, feeders, and demand responsive services.

As a result of MTA's RTAA Study, and as briefly described above, the *Los Angeles Metro Rapid Bus Demonstration Program* was developed in March 1999. This program was created to address the need for faster travel service for existing bus riders. The first two lines of this service were opened in June 2000 and are described more extensively in Chapter 2.0. One of the two demonstration lines, the Wilshire-Whittier Metro Rapid Bus, directly relates to the alternatives under consideration in this EIR. Ridership of the Wilshire/Whittier Metro Rapid Bus along Wilshire and Whittier Boulevards in 2001 was more than 40,000 boardings per day. Boarding on all buses along this corridor were estimated to be approximately 100,000 boardings per day. This high ridership figure further underscores the critical need for transit service along the Wilshire Boulevard corridor.

The MTA Board recently approved expansion of the Metro Rapid program to a countywide level, based upon performance results obtained from the demonstration corridors.

1.3 PURPOSE AND NEED FOR THE PROJECT

The purpose and need for the proposed project was presented in detail in the Mid-City/Westside Transit Corridor Major Investment Study (MIS), released in February 2000, which is hereby incorporated by reference and summarized below. This study primarily focused on the Wilshire Boulevard corridor for the development of a BRT exclusive busway to connect activity centers such as downtown Santa Monica, Westwood, Century City, Beverly Hills, Miracle Mile, Wilshire Center, and downtown Los Angeles. Section 1.4 provides a detailed description of the alternative screening process undertaken by the MTA in the MIS, which resulted in the alternatives being evaluated in this Final EIR.

1.3.1 The Mid-City/Westside Study Area Location and Demographics

The Mid-City/Westside Study Area is located in western Los Angeles County and encompasses approximately 112 square miles, roughly bounded by the Pacific Ocean on the west; Sunset Boulevard and the Hollywood Freeway (US 101) on the north; Hope Street and Figueroa Street on the east; and Slauson and Manchester Boulevards on the south. Portions of the City of Los Angeles, unincorporated areas of Los Angeles County (e.g., Baldwin Hills), and the Cities of West Hollywood, Beverly Hills, Santa Monica, and Culver City are within the Study Area.

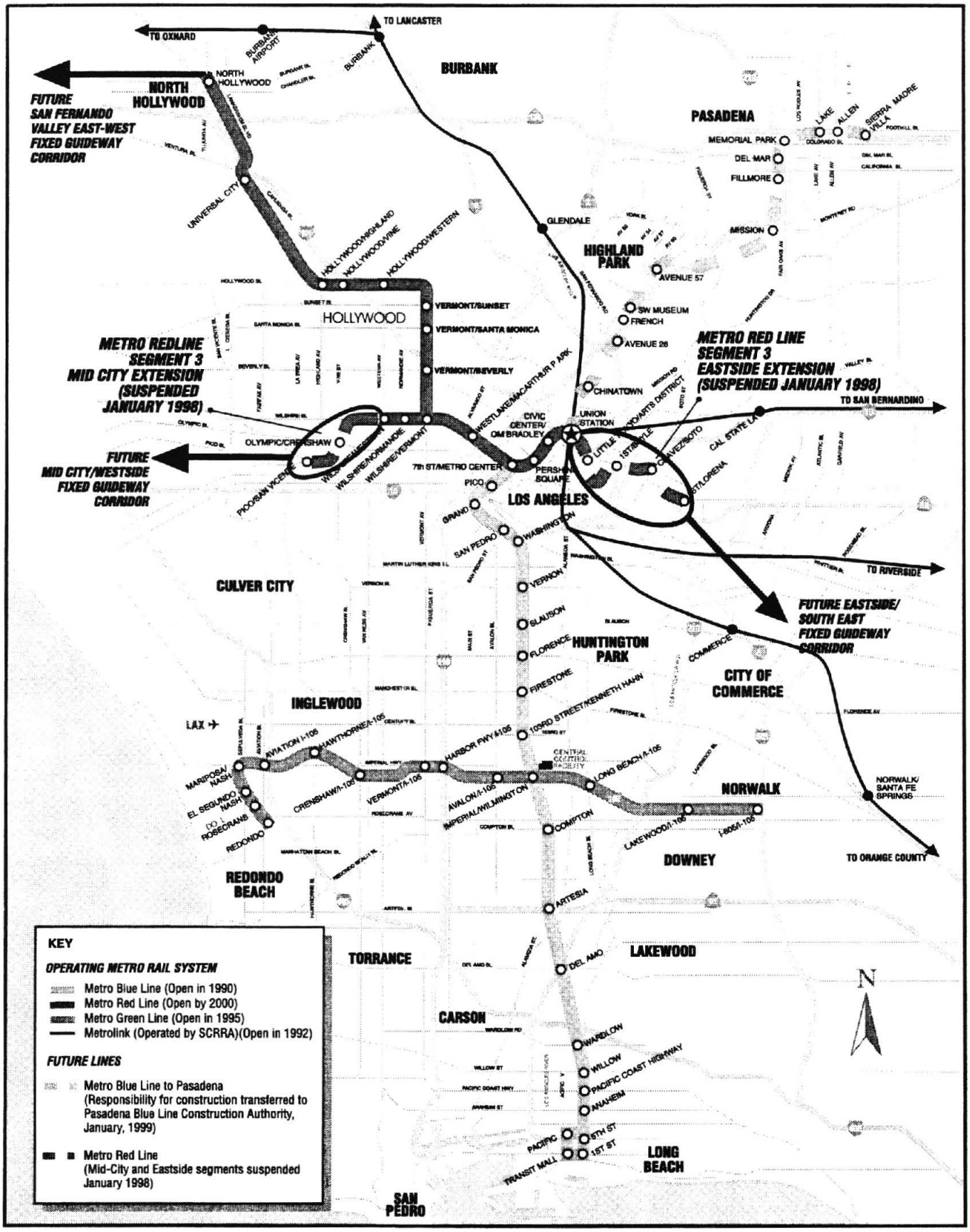
Approximately 16 percent of the population and 24 percent of the jobs in Los Angeles County are concentrated in the Study Area. According to a market trend analysis conducted by Grubb & Ellis, 27 percent of Los Angeles County's 161 million square feet of new office space is located on the Westside, which makes it the largest office market in the County (Grubb & Ellis, Office Market Trends, Third Quarter, 1999). The Mid-City/Westside Study Area represents one of three corridor study areas where potential expansion of the Los Angeles fixed-guideway system is being evaluated, as illustrated in Figure 1-1.

The other two regional study areas include the Eastside and the San Fernando Valley. These two study areas are being evaluated in separate environmental documents and are not included in this report. All of these study areas are part of the MTA's long-range planning activities and will be coordinated to provide a comprehensive transit system. However, each of these extensions has its own purpose and utility for the location in which it is placed.

Regional transportation planning for Southern California's five-county area is the responsibility of the Southern California Association of Governments (SCAG), which is the Metropolitan Planning Organization (MPO) for the area. In 1998, SCAG Regional Council adopted the Regional Transportation Plan (RTP) entitled "Community Link 21" to establish the goals, objectives and policies for the transportation system and establish the implementation plan for transportation investments over the next 20 years. The RTP includes regional performance indicators with objectives against which specific transportation investments can be measured. The performance indicators illustrate that travel conditions on the Westside will worsen by 2020 and the area will not meet regional objectives for mobility, accessibility, reliability, or safety without the implementation of additional transportation improvements, as illustrated by Table 1-1.

Average travel time to work (mobility indicator) will increase by 26 percent over 1990 conditions to 29 minutes and will exceed the regional objective of 22 minutes by 32 percent. Average travel speeds on all parts of the highway network (arterials and freeways) will decline to 22.6 mph, 32 percent below the regional objective. Approximately, 40 percent of travel in peak hours will be wasted due to delay.

The percentage of job opportunities within 25 minutes of employees' homes (accessibility indicator) will improve in the subregion due to the high employment growth, but 39 percent of the workers on the Westside will have to travel more than 25 minutes to work, compared to the regional objective of 22 minutes. The continued implementation of reduced emission vehicles (environment indicator) will reduce the amount of reactive organic gases produced on the Westside, but the reliability of the transportation system will decline. A commuter probability of arriving at a destination on time (reliability indicator) will decrease to 74 percent if riding transit and



SOURCE: Los Angeles Metropolitan Transportation Authority

Mid-City/Westside Transit Corridor

LOS ANGELES COUNTY METROPOLITAN TRANSPORTATION AUTHORITY

FIGURE 1-1
MTA SYSTEM MAP WITH EXPANSION STUDY AREAS

to 52 percent if traveling by car, illustrating how unpredictable travel will become as increased congestion will cause the subregion to exceed the regional safety objective.

Table 1-1 Mid-City/Westside RTP Performance Indicators

Performance Indicator	Measurement	Objective	1990 Results	2020 Baseline Forecast
Mobility	Average Work Trip Travel Time	22 minutes	23 minutes	29 minutes
	P.M. Peak Hour Highway Speed	33 mph	25.2 mph	22.6 mph
	Percent Of Peak Travel in Delay	33%	32%	40%
Accessibility	Work Opportunities within 25 Minutes	88%	56%	61%
Environment	Meet Federal & State Standards	Meet Air Plan Emission Budgets	82 tons per day ROG	16 tons per day ROG
Reliability	Percent Probability of On-Time Arrival	63% Transit 76% Highway	100% 100%	74% 52%
Safety	Fatalities per Million Passenger Miles	0.008	n/a	0.010

Source: SCAG, Regional Transportation Plan, 1998

1.3.2 Major Themes Supporting Transit Need in the Study Area

Given the RTP forecasts and the data provided in the MIS for the Mid-City/Westside Study Area, several themes emerge with respect to the need for transportation improvements in the Study Area. These themes are further described below.

■ The Need for Transit Improvements Has Been Established in Previous Studies

Providing high-capacity transit service improvement has been long recognized in the Mid-City/West Area. Since the 1970s, the MTA and its predecessors have conducted numerous transportation planning and environmental impact studies that described the need and feasible locations for bus, light rail, and/or heavy rail east/west service in various parts of the Study Area.

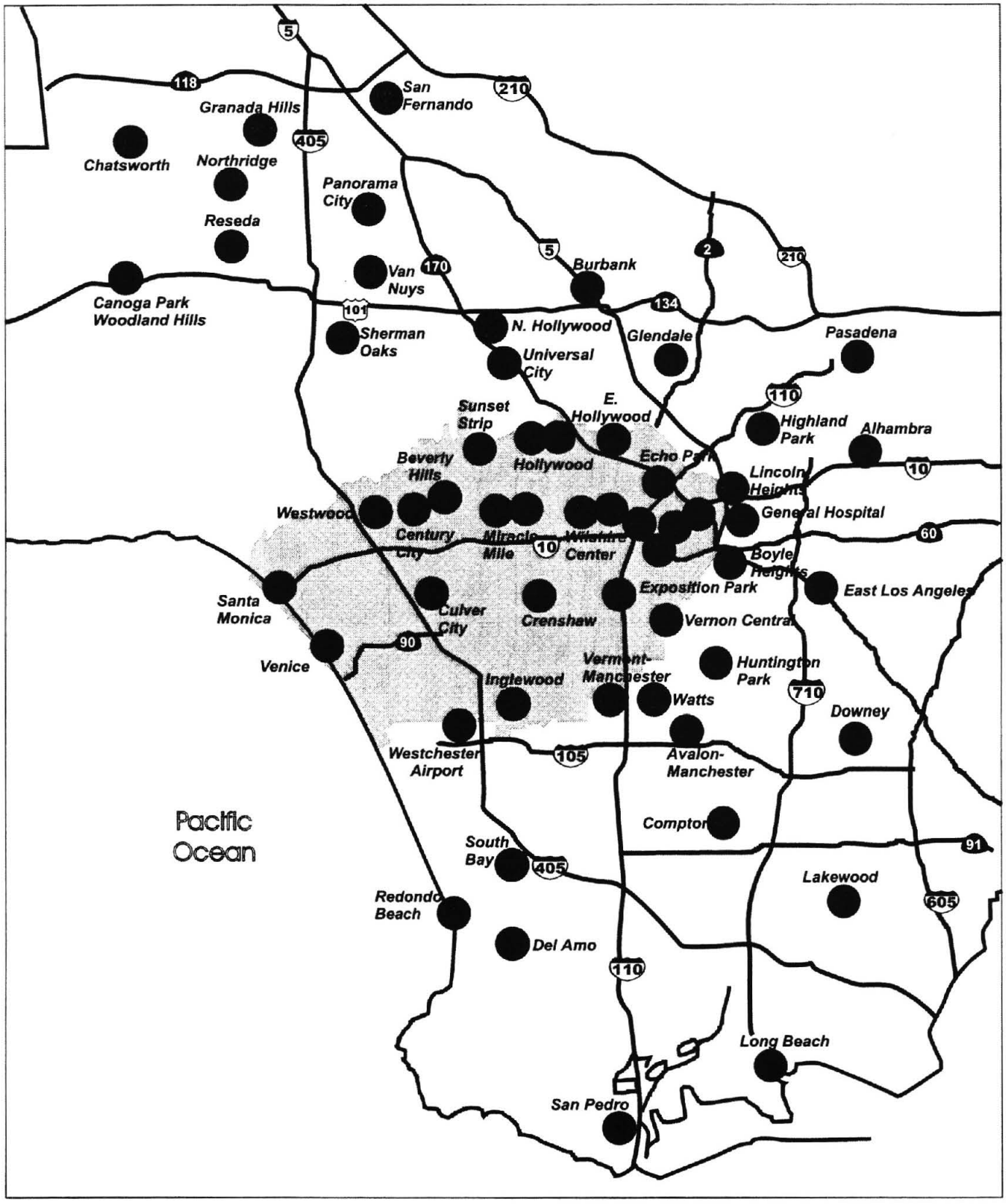
■ Study Area Contains a Major Concentration of Activity Centers and Destinations

The area contains the largest concentration of major activity centers and destinations within the Los Angeles metropolitan region. Many of these centers are located within the most congested portion of the Study Area, north of the Santa Monica Freeway (I-10) and east of the San Diego Freeway (I-405). These destinations correspond with, as well as add to, the location and number of existing activity centers. As shown in Figure 1-2, a large concentration of activity centers is located in the Study Area.

The Study Area not only encompasses the western portion of the traditional/historical downtown area, it also encompasses some of the most well known employment, entertainment, and educational/cultural activity centers in the region, including USC, UCLA, Santa Monica College, Los Angeles Trade Tech College, Rodeo Drive/Beverly Hills, Westwood Village, Hollywood Boulevard, Sunset Strip, Century City, Westside Pavilion, Paramount and Sony Studios, Los Angeles County Museum of Art, Page Museum, Petersen Automotive Museum, Wilshire Miracle Mile, Santa Monica Pier, Third Street Promenade, Los Angeles Memorial Coliseum, Los Angeles Convention Center, and the newly opened Staples Center. Currently, the Metrorail system interconnects some of the centers in the eastern portion of the Study Area, such as downtown to Hollywood to Universal City and to Mid-Wilshire. The remaining centers are served by two major freeways (I-10 and I-405), as well as by almost a dozen major east/west and north/south arterials. As discussed later in this chapter, as growth continues to be concentrated in the existing centers and a few emerging Westside centers (such as Playa Vista and Culver City), there is a limit to the physical and operational capacity of existing highways and arterials to meet travel demands generated by the centers.

The "Centers Concept" Land Use Policy Is Transit Based

Land use planning in the Los Angeles area has traditionally viewed the urban area not as a central downtown served by adjacent areas, but rather as a collection of urban centers. These centers are "little downtowns" in and of themselves. The Centers Concept Plan, originally formulated for the Los Angeles area in the 1960s and 1970s by Calvin Hamilton (Director of the Department of Los Angeles City Planning Department) and Norman Murdock (Director of the Los Angeles County Regional Planning Department), acknowledged that there were urban centers of various types throughout the region that represented concentrations of economic activity or a mix of economic activities and higher density housing (Figure 1-2). The Centers Concept envisioned that the centers would be interconnected by an infrastructure of transit. The City of Los Angeles General Plan Framework revisited and reconfirmed the Centers Concept. The Framework more clearly defined targeted growth areas, mixed-use centers, and mixed-use corridors that would serve centers that were envisioned to be interconnected by the emerging Metrorail transit system. The City of Los Angeles, working directly with the Los Angeles County Metropolitan Transportation Authority, developed a series of Transportation and Land Use Guidelines, which specifically tied the size and intensity of centers to the supporting transit infrastructure and transit station locations.



LEGEND:

Mid-City/Westside Study Area

Centers

N

SOURCE: Adapted from the City of Los Angeles, Department of City Planning, 1974

Mid-City/Westside Transit Corridor

LOS ANGELES COUNTY METROPOLITAN TRANSPORTATION AUTHORITY

FIGURE 1-2

LOS ANGELES CENTERS CONCEPT

There Is an Existing Concentration of Transit-Supporting Land Uses

The existing activity centers in the Study Area include a large concentration of land uses that are considered to be transit supporting, such as high-density housing, commercial, and retail uses, as illustrated by Figure 1-3. In fact, roughly 30 percent of the land area within the Study Area falls into the former category. These transit-related uses tend to be concentrated in three major corridors in the Study Area: a northern corridor approximating Santa Monica Boulevard; a central corridor represented by Wilshire Boulevard; and a less clearly defined southern corridor centering along Venice Boulevard. Currently, only the eastern portions of these land use corridors are served by the Metrorail System. The remaining high-density areas are served by conventional bus service by the MTA, Culver City, LADOT, and Santa Monica.

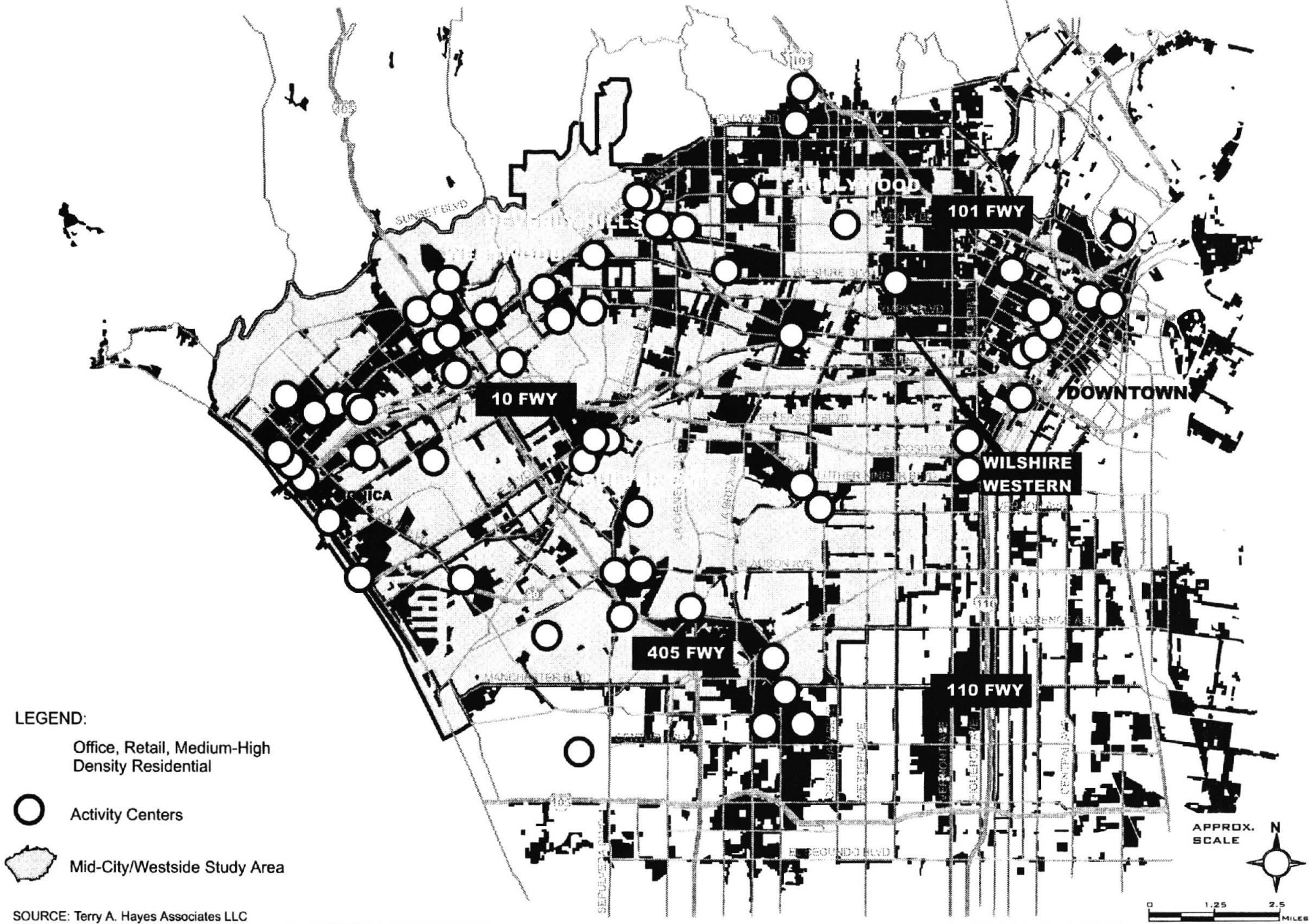
High Study Area Population and Employment Densities Support Transit

Population and employment densities in the Study Area are the highest within the metropolitan region, averaging approximately 13,883 persons per square mile and 9,167 employees per square mile. The more densely populated areas are concentrated in the eastern and northeastern portions of the Study Area, while the greatest employment densities are in the western and northwestern portions of the Study Area.

According to the West Los Angeles Transit Corridor Technical Report prepared by SCAG in 1998, the population density in the SCAG Study Area in 1990 was about 9,600 persons per square mile, which was more than four times the Los Angeles County estimate of 2,300 persons per square mile. Population density for the MTA Study Area in 1997 was approximately 13,883 persons per square mile. According to SCAG's forecasts, the population density will increase to over 17,000 persons per square mile by the year 2020, compared with 3,017 persons per square mile in the County.

Employment densities in the Study Area are also higher than those of the County. In 1997, the Study Area employees per square mile totaled 9,167, compared with a County employment density of 1,070 employees per square mile. These densities will increase by the year 2020 to 10,829 employees per square mile in the Study Area and 1,433 employees per square mile in the County.

The West Los Angeles Transit Corridor Technical Report, prepared by Southern California Association of Governments (SCAG), as part of the 1998 RTP Transit Restructuring Study, provides information on the current overall usage of transit services in the Study Area. The Study Area has been identified as having significant transit usage, and the preliminary analysis in the RTP identified a deficiency of service. Table 1-2 illustrates the existing transit mode choice at the Study Area level and at various distances from the Wilshire and Expo routes.



Mid-City/Westside Transit Corridor

LOS ANGELES COUNTY METROPOLITAN TRANSPORTATION AUTHORITY

FIGURE 1-3

TRANSIT SUPPORTING LAND USE

Table 1-2 Summary of Mode Choice Along Wilshire and Expo Routes					
Level	*All Modes*	*Drive Alone*	*Carpool*	*Transit*	*Others*
¼ Mile of Corridors	100.00%	63.82%	12.76%	11.89%	11.53%
½ Mile of Corridors	100.00%	62.88%	12.96%	12.35%	11.81%
1 Mile of Corridors	100.00%	61.63%	12.87%	13.70%	11.80%
Study Area	100.00%	62.37%	13.58%	13.64%	10.41%

Source: 1990 Census Transportation Planning Package (CTPP)

Mid-City/Westside transit ridership is best summarized using the Census Transportation Planning Package (CTPP) transportation data collected as part of the 1990 Census. Based on the census data, 41 percent of all work transit trips in Los Angeles County originate in the Study Area. The remaining 59 percent originate at various points in the County and may potentially run through the Study Area. West L.A. (as defined by this report) contains 18 percent of Los Angeles County's population, implying that the transit needs of West L.A. are higher than the service presently provided. In addition to the high transit mode split of 14 percent, the Study Area has a significantly higher use of transit than the rest of Los Angeles County. This demand warrants a much higher percentage of transit investment than it has received in the last fifteen years.

Local Redevelopment Plans Depend Heavily on Transit Improvements

There are almost twenty redevelopment areas, enterprise zones, and other investment areas targeted by local jurisdictions within the Study Area. The ultimate success of redevelopment and revitalization of these areas largely rests on transportation accessibility and links to transit. Some improvements and strategies being employed—such as Santa Monica Boulevard improvements in West Hollywood and Santa Monica—focus on increasing pedestrian amenities and reducing or eliminating vehicular traffic, which places increasing demand on increased transit access and on the level of transit service to help support existing and future land use development objectives.

There Is a History of Transit Usage in the Study Area

Existing transit usage within the Study Area is proportionally higher than any other area in Los Angeles County (13.6 percent for the Study Area versus 6.8 percent for the County). Because there is a large base of existing transit service and transit patrons, increasing the transit mode share through increased service would represent a natural extension of existing patterns and trends.

In addition, because the Study Area represents a significant concentration of educational, cultural entertainment, and office centers, and because the area is the most densely populated area within the region (over 13,883 persons per square mile), there has traditionally been a substantial amount of transit service and transit use. According to the SCAG Transit Corridor Technical Report, the proportion of workers who took the bus in the Study Area was double that of the County (13.64 percent for the Study Area versus 6.8 percent for the County). This is further substantiated by the Census Transportation Planning Package (CTPP) transportation data collected as part of the

1990 Census. This data indicate that 41 percent of all work transit trips in Los Angeles County originate in the Study Area.[1]

■ There Is a Significant Transit-Dependent Population in the Study Area

Part of the underlying reason for high transit usage in the Study Area is that a significant number of households are autoless and have low incomes. According to the 1990 Census, approximately 18.3 percent of households in the Study Area are without a vehicle compared to 10.9 percent for the County. The majority of these households are concentrated in the eastern and northeastern portions of the Study Area. 20.9 percent of the population of the Study Area was below poverty status compared to 14.7 percent in the County, and households in the Study Area had a weighted income of $5,451 less than that of Los Angeles County.[2]

■ The Study Area Is Expected to Continue to Capture a Large Share of Regional Population and Employment Growth

As reflected by Table 1-3, population and employment forecasts to the year 2020 adopted by SCAG clearly suggest that the Study Area will capture a disproportionate share of growth over the next 20 years, thereby placing further demands on transit service and resulting in increased congestion on local roadways and regional highways serving the Study Area.

According to SCAG's recent forecast (April 1998), the Study Area is expected to grow by 356,265 persons (18.85 percent increase) and 186,200 employees (15.35 percent increase) between 1997 and 2020. The forecast strongly suggests that both the Mid-City and West Los Angeles portions of the Study Area are expected to attract significant growth.

Table 1-3 Population & Employment Forecast

Year	1997	2010	2015	2020	1997-2020
Population					
MTA Study Area	1,555,005	1,725,512	1,813,919	1,911,270	18.85%
LA County	9,524,890	10,868,869	11,513,385	12,249,104	22.24%
% of LA County (MTA)	16.28%	15.88%	15.75%	15.60%	
Employment					
MTA Study Area	1,026,685	1,134,474	1,170,729	1,212,885	15.35%
LA County	4,345,926	5,223,383	5,511,845	5,817,654	25.30%
% of LA County (MTA)	23.62%	21.72%	21.24%	20.85%	

Source: SCAG Forecast, April 1998

[1] SCAG West Los Angeles Transit Corridor Technical Report, 1998, pp. 15 and 18, respectively.
[2] Op. Cit., p. 10.

Continued Growth in the Business Services Sector (Entertainment and Media Related) Underlies the Future Development Potential in the Study Area

Growth in the Study Area will continue to be fueled by entertainment- and media-related businesses concentrated in the western part of the Study Area. As further indicated in the Grubb & Ellis report, other sectors in the Westside economy contribute to regional, as well as statewide, economic growth. The report states that, in the 1980s and 1990s, five sectors emerged to propel California economic base forward: foreign trade, high tech manufacturing, professional services, tourism, and entertainment. The West Los Angeles market is home to most of these industries, which have been a principal catalyst to economic growth and a driving force for the office market.[3] Over the past decade there has been an ever-increasing number of these businesses located in West Los Angeles/Century City, Santa Monica, and Culver City. Many of the current office and warehouse space vacancies are featuring references to the availability of "creative space" rented in 10,000-plus square-foot increments.[4] Real estate analysts expect that the demand for production and creative spaces will continue to be robust. The industries and businesses that are attracted to the Study Area are those that are expected to be the foundation of the local and regional economy for many years into the future. In addition, the Mid-City/Westside area is the center of approximately one-third of all new office construction underway in LA County.[5]

Existing and Projected Travel Demand Patterns and Justification for Transit Services

The Study Area attracts thousands of trips each day from all areas of the Los Angeles region. Growth levels in both population and employment documented above will further exacerbate travel demand. Based on the output of the MTA Transportation Model, there are currently strong interaction patterns between the Study Area and the West and East San Fernando Valleys, as well as in the South Bay.

Over 45 percent of daily work trips generated by the Study Area are internal trips that have both the origin and the destination within the Study Area. This includes almost 5 percent to and from downtown and over 41 percent within the remaining parts of the Study Area. The San Fernando Valley is one of the most predominant origins/destinations for works trips to and from the Study Area, at 9.4 percent of the total trips. When north Los Angeles County and the Glendale area are added to this group, areas to the north of the Study Area represent over 17 percent of all work-trip interactions. Another predominant origin/destination outside the Study Area is the South Bay/Long Beach area with nearly 15 percent of the total work trips. San Gabriel/Pomona Valleys, with 7.5 percent, and the southeast County area, with 8.3 percent of the total work trips, are also significant origin/destination points.

Nearly 19 percent of the work trips to/and from the Westside portion of the Study Area are internal. There is a strong interaction between the west and north parts of the Study Area (20.5 percent of all work trips). Over 16

[3] Ibid.

[4] Creative space indicates both the creative use of buildings built with a standard utilization in mind, and a tenant profile catering to expensive and skilled labor force companies want to nurture in the workplace." Grubb & Ellis, 2000 Real Estate Forecast, 1999, p. 7.

[5] Grubb & Ellis Office Market Trends, West Los Angeles, Third Quarter 1999, p. 1.

percent of the work trips related to the Westside are to/from San Fernando Valley and points north. The interaction of work trips between the northern portion of the Study Area (areas generally north of I-10, including downtown) and other communities indicate that nearly 30 percent of the work trips to/and from this area are internal. This part of the Study Area has the strongest interaction with San Fernando Valley and points north, with over 22 percent of the total work trips to/from this area. The work-trip interaction between this area and other parts of the Study Area make up between 8 to 9 percent of total work trips.

The interaction of work trips between the southern portion of the Study Area (areas generally south of I-10) and other communities indicate that only 13.4 percent of the work trips to/and from this area are internal and the sub-area has a strong interaction with the Westside, at 10.7 percent, and with the north side (including downtown), at 22.6 percent of the total work trips. The southern part of the Study Area also has a strong interaction of work trips with the South Bay and the Southeast, with almost 33 percent of the total work-trips to/from this area. On the other hand, the work trip interaction between this area and San Fernando Valley and points north is relatively less, with only 10.6 percent of the total work trips.

Based on the overall interaction patterns between the Study Area and surrounding areas, a simplified "spider network" was constructed to identify potential corridors of travel patterns and the magnitude of travel activity. The thickness of the lines on the network is proportional to the identified level of travel demand for home-to-work trips between the two adjacent communities. The level of travel also includes potential through travel from other communities that would use major routes connecting the two adjacent communities.

The 1997 data identify heavy work-travel demand between the Mid-City/Westside Study Area and the San Fernando Valley along both the Sepulveda and Cahuenga passes. Work-travel demand is also heavy to the southeast and east along the San Bernardino and Golden State Freeway corridors. Within the Mid-City/Westside Study Area, three distinct parallel east/west corridors can be observed, which connect downtown Los Angeles to points west of the San Diego Freeway: a northern corridor approximating Santa Monica Boulevard; a central corridor represented by Wilshire Boulevard; and a less clearly defined southern corridor on, or south of, the Santa Monica Freeway.

The 2020 conditions reveal that work-travel demand along every corridor is expected to increase significantly in the future. This is the case for trips between communities in the Study Area, as well as travel to and from the San Fernando Valley and the east side. Several east/west corridors within the Study Area show travel demand well in excess of 200,000 daily two-way work trips. The pattern of three distinctive east/west corridors within the Study Area is again apparent for 2020 conditions, with all community-to-community movements showing significant increases in demand.

There is strong east/west travel demand along major east/west corridors: Santa Monica Boulevard, Wilshire Boulevard, I-10, and Exposition/Venice Boulevards. None of these corridors is currently served by a high-capacity transit system.

Travel growth projection characteristics for the Mid-City/Westside Study Area were obtained and summarized from the Los Angeles County MTA's travel demand model.[6] Three of the most meaningful categories of travel characteristics are

- *Total Daily Person Trips*—the number of one-way trips made by all persons within a 24-hour period
- *Daily Home-to-Work Person Trips*—the number of one-way trips made by all persons between home and work location within a 24-hour period
- *Daily Transit Person Trips*—the number of one-way trips made by all persons on transit (bus and rail) within a 24-hour period

A summary of these statistics compiled for 1998 and 2020 are presented in Table 1-4. Statistics related to the entire region are shown on the left side of the table, whereas the information on the right side pertains to the Study Area.

All Trips

As seen in the first section of the table, in 1998 there were a total of approximately 50.7 million daily person trips made in the five-county region. As the second row of figures shows, 10.3 million, or 20.3 percent of these total daily trips are two-way home-to-work trips, and almost 1.6 million of the daily trips, or 3.2 percent are made on transit. As the table also illustrates, there are nearly 8.5 million daily person trips made in the Study Area, of which 2.3 million, or 27.5 percent are home-to-work trips, and over 675,000 trips, or 8 percent are made on transit.

When compared to the region as a whole, it can be seen that the Study Area has a higher percentage of work trips (by 7 percentage points) of all daily trips. This is a reflection of relatively higher population density as well as an abundance of employment opportunities in the Study Area. The more notable observation is the significantly higher transit percentage for Study Area trips compared to the overall regional transit percentage. The Study Area's 8 percent transit mode split is 2.5 times higher than the regional 3.2 percent mode split. This is a clear indication of two characteristics related to the Study Area: high transit dependency in certain Study Area communities and relatively high use of transit services provided in the Study Area.

The significance of the Study Area's travel characteristics in 1998 as compared to the region is shown in the third category of the table. This part of the table has some revealing facts. Whereas, the Study Area's total daily person trips account for 16.7 percent of the total trips in the region, more than one out of every five home-to-work trips in the region (22.7 percent) is related to the Study Area. This again, points to the higher population and employment opportunities in the Study Area. The Study Area's share of regional transit trips is extremely significant. The statistics show that 42.2 percent (more than 2 out of every 5) daily transit trips made in the region have either an origin or a destination in the Study Area.

[6] The travel demand model provides statistics, which describe the magnitude and overall travel characteristics of the five County Southern California area in general, and Los Angeles County in particular. The model can be used to get information about existing travel patterns as well as to develop future travel forecasts. The model provides data on total daily and peak hour travel by various modes, including personal vehicle (single occupant or carpool) and transit (bus and rail). This model is used to develop travel forecasts on highways and patronage (ridership) forecasts for transit services.

Table 1-4 Summary of Person Travel Characteristics—Mid-City/Westside Study Area

Person Trips and Growth, 1998–2020	*Region*			*Corridor*		
	*1998**	*2020*	*Growth*	*1998*	*2020*	*Growth*
Total Daily Person Trips	50,705,715	65,952,425	30.1%	8,479,289	9,596,260	13.2%
Daily Home-to-Work Person Trips	10,271,754	13,092,874	27.5%	2,328,448	2,666,914	14.5%
Daily Transit Person Trips	1,597,598	2,018,584	26.4%	674,979	815,057	20.8%
Home-to-work and Transit Trips as a Percentage of Total Trips	*Region*			*Corridor*		
	1998	*2020*		*1998*	*2020*	
Total Daily Person Trips	100.0%	100.0%		100.0%	100.0%	
Daily Home-to-Work Person Trips	20.3%	19.9%		27.5%	27.8%	
Daily Transit Person Trips	3.2%	3.1%		8.0%	8.5%	
Corridor Trips as a Percentage of Regional Trips				*Corridor*		
				1998	*2020*	
Total Daily Person Trips				16.7%	14.6%	
Daily Home-to-Work Person Trips				22.7%	20.4%	
Daily Transit Person Trips				42.2%	40.4%	
Corridor Internal-Internal Trips and Growth				*Corridor*		
				1998	*2020*	*Growth*
Total Daily Person Trips				4,438,461	4,878,137	9.9%
Daily Home-to-Work Person Trips				652,708	681,254	4.4%
Daily Transit Person Trips				411,736	449,720	9.2%
Internal-Internal Home-to-work and Transit Trips as a Percentage of Total Trips				*Corridor*		
				1998	*2020*	
Total Daily Person Trips				100.0%	100.0%	
Daily Home-to-Work Person Trips				14.7%	14.0%	
Daily Transit Person Trips				9.3%	9.2%	
Internal Trip Retention Percentage in the Corridor				*Corridor*		
				1998	*2020*	
Total Daily Person Trips				52.3%	50.8%	
Daily Home-to-Work Person Trips				28.0%	25.5%	
Daily Transit Person Trips				61.0%	55.2%	

Region = Five-County Southern California MTA Modeling Area **Corridor** = Mid-City/Westside Study Area

* According to SCAG's 1997 regional model, the total daily person trips are estimated at 52 million, daily HBW person trips are 8.8 million. The MTA model is being revised and the data is higher in both categories.

Source: Compiled by Meyer, Mohaddes Associates from LACMTA Travel Demand Model Trip Tables

Internal Trips

Travel statistics, which are also presented in Table 1-4, are related to all trips that either originate in, or are destined for, the Study Area. The last categories of data provided in Table 1-4 provide information about the Study Area's internal trips. Internal trips are those that have both ends of the trip (origin and destination) entirely within the Study Area. As can be seen, in 1998 there were a total of 4.4 million daily trips that stayed entirely within the Study Area. Over 652,000 of these, or 14.7 percent, were work trips, and 411,000, or 9.3 percent, were transit trips.

When comparing the internal trips to total trips generated by the Study Area, it can be seen that a relatively large portion of the total trips, approximately (52.3 percent) stay within the Study Area. This is an indication of availability of travel opportunities (both home and work) for all trips in the Study Area, which results in high trip retention. However, the percentage of retention for work trips is significantly lower at approximately one out of four (28.0 percent). This shows that many residents commute to work destinations outside the region. When analyzing the internal capture of transit trips, the trends are even higher than all trips, showing 61 percent of all transit trips generated by the Study Area staying entirely within the Study Area's boundaries.

Future Trends

Forecasts of travel statistics were also made available from the MTA model for 2020. These data are also presented in Table 1-4 in conjunction with the corresponding 1998 information. Comparison of 1998 and 2020 data for each category, both for the region and the Study Area, provides information about expected growth in magnitude of travel and the relative significance of this growth when compared to the expected regional growth.

The region's 50.7 million total daily trips are expected to grow by 30.1 percent to nearly 66 million by 2020. Home-to-work trips will grow similarly by 27.5 percent, from 10.3 million to 13.1 million. The expected growth in regional transit trips is also relatively consistent, at 26.4 percent, from 1.59 million to just over 2 million. There is, however, a notable difference between the Study Area and the region as it relates to growth in travel. Overall, the three travel indicators show lower growth for the Study Area compared to the region as a whole. While the 1998 to 2020 growth of the regional statistics were between 26 and 30 percent, the Study Area's growth is in the 13 to 21 percent range. This is a reflection of relative maturity and built-out nature of the Study Area. In the 23-year span, total daily trips in the Corridor are expected to grow by 13.2 percent, from 8.5 million to 9.6 million. The growth in home-to-work trips is slightly higher, at only 14.5 percent, from 2.3 million to 2.7 million. However, the Study Area's transit trips are expected to increase at a much higher rate than total trips, by 21 percent, from the 1998 level of 675,000 to 815,000 by 2020.

As seen in the second category of Table 1-4, the share of daily home-to-work and transit trips as a percentage of the total trips is expected to remain very similar to 1998 trends, both for the region and the Study Area. However, as the overall regional transit mode split shows a slight decrease (from 3.2 to 3.1 percent), the Study Area's transit mode split is expected to increase slightly (from 8 to 8.5 percent).

With the expected high regional growth levels, share of Study Area trips as a percentage of total regional trips show declines in all categories in 2020 compared to 1998. All daily trips will be 14.6 percent, home-to-work trips will drop to 20.4 percent, and transit trips will fall slightly to 40.2 percent. It should be pointed out that, regardless of these declines, the Study Area's share of regional travel would still be fairly significant in all categories.

It was discussed earlier that the Study Area's total trips in all categories lagged behind the region in projected growth. When the growth in internal trips is analyzed, the Study Area shows similar trends. Total internal trips are expected to grow at only 9.9 percent. Internal home-to-work trips are projected to grow by 4.4 percent. Internal transit trips are expected to grow by 9.2 percent.

The last two categories of the table also point to the fact that in 2020, home-to-work and transit trips will make up slightly lower percentage of total daily trips compared to 1998, and the percentage to retention for each trip category will decrease slightly.

Several key points can be concluded from the above statistics:

- The Mid-City/Westside Study Area is a highly significant origin and/or destination point for trips in Southern California, especially for transit trips, with over 42 percent that have one end in the Study Area
- The Study Area has a significantly higher transit mode split than the region as a whole, and the trend is expected to increase (from nearly 2.5 to 2.7 times the regional mode split)
- The Study Area currently has a very high internal trip retention (over half of all trips), and despite growth in regional trips, it is expected to maintain these high internal trip retention percentages

Another primary indicator of changing travel patterns in the Study Area is traffic volume along I-10 (refer to Table 1-5). This facility bisects the Study Area and is the primary transportation facility serving east/west travel between downtown Los Angeles and Santa Monica. The travel patterns on the freeway illustrate how longer-distance trips in the Study Area may be oriented. Over the last 20 years, those patterns have significantly changed as well. In the 1970s, commute patterns were heavily oriented from the Westside toward downtown Los Angeles. The freeway was heavily congested in the eastbound direction in the morning peak hours and in the westbound direction in the afternoon peak hours. With the significant increase in jobs on the Westside, the commute patterns have reversed. The Santa Monica Freeway is now more congested in the westbound direction in the morning and the eastbound direction in the evening, and traffic volumes are very heavy in both directions all day long. Existing conditions are illustrated in photographs taken of I-10. Many of the commute trips to the Westside originate east of downtown.

While the total daily traffic volume on I-10 has remained relatively constant over the last ten years, the peak-hour volumes have increased significantly at the two ends of the freeway in the Study Area near the San Diego Freeway and near downtown. In the Mid-City section, the traffic volume has generally decreased during the last ten years. Table 1-5 provides a comparison of volumes between 1989 and 1998 on Santa Monica Freeway within the Study Area.

Table 1-5 Traffic Volume Trends on Santa Monica Freeway

Segment	*1989 Traffic Volumes*	*1989 Traffic Volumes*	*1998 Traffic Volumes*	*1998 Traffic Volumes*
	Peak Hour	Daily Volume	Peak Hour	Daily Volume
West of I-405	14,900	230,000	16,700 (+12%)	231,000 (+0.4%)
Overland to I-405	14,700	266,000	19,100 (+30%)	272,000 (+2%)
La Brea to Crenshaw	20,000	314,000	20,300 (+1.5%)	293,000 (-7%)
Hoover to I-110	18,500	337,000	22,000 (+19%)	325,000 (-4%)

Source: MMA, 1999

Peak-Hour Congestion on Study Area Roadways Underlies the Need for Transit Improvements

There is substantial peak hour congestion in the northern portion of the Study Area. Vehicular travel to the East and West San Fernando Valleys must ultimately bypass through the Sepulveda or Cahuenga passes. Access patterns to these routes are congested during the peak travel hours as motorists attempt to pass northward at either the western or eastern ends of the Study Area.

The majority of congested segments are concentrated north of I-10 and east of I-405. The densest concentration of congested segments is located in the northeastern portion of the Study Area, and reflects Study Area traffic flowing toward access points to the eastern San Fernando Valley, Glendale, and Burbank. The other major area of congestion occurs on I-405 and Wilshire Boulevard area where travel to the western San Fernando Valley is concentrated.

Total morning and evening peak-hour freeway and arterial traffic volumes in the peak direction were compared to the total available capacity. This was done for both existing 1997 and future 2020 conditions. The following paragraphs summarize some of the key observations.

Existing Conditions (1997)

- North/south travel demand on all facilities crossing Wilshire Boulevard is currently 15 percent over the available capacity
- North/south travel demand on all facilities crossing Venice Boulevard is 10 percent over the available capacity
- East/west travel demand on all facilities crossing La Cienega Boulevard is 10 percent over the available capacity

Future (2020) Conditions

- All corridors within the Study Area (north/south and east/west) show increase in travel demand compared to existing conditions
- All corridors show either no change or significant increases in overall highway capacity deficiency compared to existing conditions
- The most significant increases in travel demand are expected to be for north/south travel across Jefferson Boulevard and for east/west travel across Vermont Avenue
- North/south travel demand across Wilshire Boulevard will be 14 percent over the available future capacity
- North/south travel demand across Venice Boulevard will be 21 percent over the available future capacity
- East/west travel demand across Vermont Avenue will be 21 percent over the available future capacity

Local Policies are Oriented Toward Demand Management and Transit Solutions, Rather Than on Physical Roadway Improvements

Because of the level of buildout and density within the Study Area, local jurisdictions have generally determined through their local policies that congestion relief improvements should focus on travel demand management and

increased ride sharing and transit usage rather than highway/arterial physical improvements, such as road widening or new roadways. In a number of cases, local communities that desire to eliminate cut-through and neighborhood traffic to support more livable downtown or commercial areas are supporting initiatives to limit roadway capacity or slow traffic flow, leaving transit improvements as the only viable alternative to reduce traffic volumes and congestion-related delays.

To assist in the implementation of the Regional Comprehensive Plan and the associated Regional Transportation Plan, SCAG has decentralized local jurisdiction participation into specific subregions. The Study Area is encompassed by the Westside Cities Subregion (Santa Monica, West Hollywood, Beverly Hills, and Culver City), as well as by the Los Angeles Subregion (consisting solely of the City of Los Angeles).

In each of the cities on the Westside, policy-makers have taken strong positions against the wholesale widening of streets and narrowing of sidewalks to accommodate more travel lanes. Localized Transportation System Management (TSM) improvements, such as additional turn lanes or signal phasing changes, have been supported, but the Mid-City/Westside arterial network is essentially built out. In this highly urbanized area, the types of transportation improvements that have the support of the policy makers are transit improvements, intelligent transportation systems projects, and livable communities programs. Future increases in travel demands will have to be accommodated by making the existing highway network work better where possible, but more likely through increased usage of transit and other (i.e., non-motorized) modes of transportation. Throughout the Westside, efforts are also underway in all of the jurisdictions to make it harder for automobile traffic to seek alternate routes through residential neighborhoods. These traffic calming programs will further concentrate commute traffic on the already congested arterial streets.

1.4 ALTERNATIVES SCREENING PROCESS

One of the most important aspects of the environmental review process is the identification and assessment of reasonable alternatives that have the potential for avoiding or minimizing the environmental impacts of a proposed project. In addition to mandating consideration of the No Action Alternative, both NEPA Regulations (40 CFR 1502.14) and CEQA Guidelines (Section 15126(d) emphasize the selection of a reasonable range of technically feasible alternatives and the preparation of a comparative analysis of these alternatives to allow for adequate consideration by decision-makers. NEPA Regulations (Section 1502.14(c)) provide for the inclusion of reasonable alternatives, including those that may not be within the jurisdiction of the lead agency. CEQA Guidelines state that the discussion of alternatives shall focus on alternatives capable of eliminating or reducing significant adverse environmental effects of the proposed project, even if these alternatives would impede to some degree the attainment of the project objectives or would be more costly. Finally, CEQA Guidelines declare that an EIR need not consider an alternative whose effect cannot be reasonably ascertained and whose implementation is remote or speculative.

To better understand how and why alternatives were selected for, or eliminated from, further consideration, the process used to develop the alternatives is presented below. The development of the alternatives involved a lengthy, multi-step process, and included

- An alternatives-identification and screening process conducted during the MIS phase of study (as described above in Section 1.3 above)
- Actions taken by the MTA Board based on findings from the MIS (as described below in Section 1.4.2)
- Design modifications based on input provided by the public during the EIR scoping period

1.4.1 Alternatives Screening Methodology

As mentioned above, the development of the alternatives involved an extensive screening process. The screening process served two overall purposes:

1. To eliminate alternatives that do not conform to NEPA/CEQA requirements
2. To distinguish alternatives to the project from other EIR elements (such as suggested mitigation measures)

Alternatives to the proposed project were initially selected for this study based on the planning efforts that had occurred prior to this study (as described in Sections 1.2 and 1.3 above), as well as input from the public during the EIR scoping hearings, agency suggestions, and public comments on the draft MIS. The alternatives screening process consisted of the following steps:

- Develop project objectives
- Determine significant impacts to be avoided or minimized
- Develop broad list of alternatives
- Develop screening criteria for feasibility
- Screen alternatives for feasibility
- If alternative is determined to be infeasible, eliminate from further consideration and provide explanation for its elimination
- If alternative is determined to be feasible, carry alternative forward into the next, more-detailed evaluation in the Draft EIR

Infeasible alternatives and alternatives that clearly offered no potential for environmental advantages were removed from further consideration and analysis. In the final phase of the screening analysis, the advantages and disadvantages of the remaining alternatives were carefully weighed with respect to the potential for overall environmental advantage, technical feasibility, and consistency with project and public objectives. These criteria are discussed in the following subsections.

Potential to Eliminate Significant Environmental Effects

If an alternative clearly does not provide any environmental advantages as compared to the proposed project, it is eliminated from further consideration. At the screening stage, it is not possible to evaluate potential impacts of the alternative or the proposed project with absolute certainty. However, it is possible to identify elements of an alternative that are likely to be the source of impacts and to relate them, to the extent possible, to general conditions of the Study Area or to other concepts that encompass the bounds of the issue which the alternative is intended to address.

■ Feasibility

For the screening analysis, the technical and regulatory feasibilities of various potential alternatives were assessed at a general level. Specific feasibility analyses are not needed for this purpose. Infeasibility was defined more by kind than by degree. The assessment was directed toward reverse reason (i.e., was anything about the alternative infeasible on technical or regulatory grounds?).

■ Consistency with Project Objectives

The objectives of the project are described in Section 1.3 (Purpose and Need) above. For screening purposes, the following general project objectives were established:

- Provide high-capacity transit service to the Westside
- Develop high-capacity transit system at a relatively low cost
- Build upon successes of Rapid Bus currently operating in the Wilshire/Whittier corridor
- Develop high-capacity system that incorporates many of the elements found in the Curitiba rapid bus system, which has many of the components envisioned for the Mid-City/Westside Transit Corridor

The screening analysis does not focus on relative economic factors of the alternatives, since the CEQA Guidelines require consideration of alternatives capable of eliminating or reducing significant environmental effects even though they may "impede to some degree the attainment of project objectives or would be more costly." NEPA (40 CFR Part 1502.23) requires that the merits and drawbacks of the various alternatives need not include a monetary cost-benefit analysis, and states that economic concerns should not overshadow qualitative considerations. Likewise, the question of market demand is not considered.

1.4.2 Summary of Screening Results

Proposed alternatives identified by the MTA (Lead Agency), other affected public agencies, and the members of the general public are listed below. It should again be noted that only those alternatives pertaining directly to the Wilshire BRT project are noted below. Alternatives considered for the Exposition ROW will be analyzed in a separate Final EIR that will be prepared at a later date.

■ Alternatives Evaluated in the Mid-City/Westside Transit Corridor Study Re-Evaluation/Major Investment Study (MIS)

As discussed in Sections 1.2 and 1.3 (above), the alternatives evaluated in the Mid-City/Westside MIS evolved over a seventeen-year time span and reflected a certain evolutionary process influenced by expanded knowledge of the existing geotechnical conditions, and greater community awareness and understanding of general transit needs. This process was derived from previous studies of the selected LPA associated with the Wilshire corridor.

Based on the previous study efforts conducted for the Study Area, a set of alternatives was selected for screening in the MIS phase prior to the preparation of the Draft EIR. The alternatives evaluated in the MIS pertaining to the

Wilshire corridor only, and the recommendation to either study an alternative or eliminate it from further consideration, are described below.

- *Wilshire Bus Rapid Transit (BRT)*—This alternative provided an interim solution to the expansion of the Metro Red Line and serves the high transit volume on the Wilshire Corridor at a low cost. The Wilshire BRT allows faster speeds than Metro Rapid Bus in future as congestion grows.
- *Wilshire Heavy Rail Transit (HRT) (via Pico/San Vicente Boulevards)*—This alternative provided a longer route to the Westside than the Wilshire Corridor and traveled in a corridor with lower density, serving fewer activity centers than the Wilshire Corridor. This alternative was also not deemed feasible due to funding restrictions of heavy rail transit. Therefore, this alternative was deleted from further consideration.
- *Wilshire Heavy Rail Transit (HRT) Subway*—This alternative had an underground gas issue, although there may be technical solutions that would permit construction of a subway at a later date. However, this alternative was deemed not feasible due to funding restrictions and the Methane Gas Prohibition Zone. Further analysis of this alternative could be undertaken in the MTA's Long Range Plan due to high densities and transit use. However, for purposes of this study, this alternative is deleted from further consideration.
- *Wilshire Heavy Rail Transit (HRT) Aerial*—This alternative achieved the same ridership at a lower cost than the subway alternatives, but would alter the character of Wilshire Boulevard in a permanent and adverse manner. The monorail option would have similar negative environmental consequences and would attract fewer riders than HRT. This alternative was deleted from further consideration.

The MIS conclusions and recommendations were forwarded to the MTA for their consideration.

MTA Board Action Regarding Alternatives

At the MTA's regular February 2000 Board meeting, the Wilshire BRT and Exposition Bus Rapid Transit and Light Rail Transit alternatives were selected for environmental review and further analysis. In June 2001, the MTA Board adopted a Locally Preferred Alternative consisting of Bus Rapid Transit (BRT) for the Wilshire Boulevard route and Light Rail Transit (LRT) for the Exposition route. At that time, the MTA Board separated the Wilshire BRT and Exposition LRT in separate environmental documents.

The alternative being considered and evaluated in this Final EIR is described in the following section (Section 2.0 [Locally Preferred Alternative]).

2.0 LOCALLY PREFERRED ALTERNATIVE

2.1 INTRODUCTION

This section describes the Locally Preferred Alternative (LPA) for the Wilshire Boulevard Corridor adopted by the MTA Board on June 28, 2001. The LPA is a Bus Rapid Transit (BRT) project, operating in the curb lane of Wilshire Boulevard, which is the same location as the present Metro Rapid Bus. In off-peak hours and on weekends, the entire route would operate in mixed flow traffic, just as it does today. During peak period (7:00 A.M.–9:00 A.M. and 4:00 P.M.–7:00 P.M.), selected segments would operate as "Bus Only" lanes, subject to the approval of each city/jurisdiction. Areas of Wilshire Boulevard recommended for exclusion for consideration as peak period dedicated segments include Westwood (Comstock to Selby) and Santa Monica (Centinela to Ocean).

In making its decision to adopt the LPA, the Board responded to the numerous community concerns regarding the loss of travel lanes, on-street parking, left turn lanes, and landscaped medians associated with a 24-hour, exclusive bus lane on Wilshire Boulevard. The adopted LPA significantly reduces these impacts. The MTA Board action also included the adoption of separate LPAs for the Wilshire BRT Route and for the Exposition LRT Route, with consideration of the Exposition LRT Route to be addressed in a separate environmental document.

In addition to providing a description of the LPA and the project implementation approach, this section also provides an overview of bus rapid transit, the existing MTA Metro Rapid Bus system, the other Wilshire Boulevard alternatives considered in the Draft EIS/EIR, and the alternatives evaluated in this Final EIR.[1]

2.2 BUS RAPID TRANSIT AND METRO RAPID BUS

A Bus Rapid Transit (BRT) system is defined as a high capacity bus route that operates with selected features normally reserved for higher capacity transit modes such as light rail. The concept, which evolved from the evaluation and consideration of the bus system found in Curitiba, Brazil, contains many essential project elements. Table 2-1 provides a comparison of the Curitiba system elements with those incorporated into the MTA Metro Rapid system, now in operation along Wilshire Boulevard and Ventura Boulevard in the San Fernando Valley (Phase I Demonstration) and those BRT elements being considered for addition (Phase II Expanded System).

Figure 2-1 provides descriptions of the Metro Rapid Bus vehicle and stations. Figure 2-2 shows the existing routes of the Metro Rapid Bus system. One of these lines, the Wilshire/Whittier route, operates from downtown Los Angeles, along Wilshire Boulevard, traversing a portion of the Metro Red Line, from Alvarado Street and Western Avenue to Wilshire Boulevard and Ocean Avenue in Santa Monica. The Wilshire BRT project would travel this same portion of the Wilshire/Whittier route, providing an advanced bus technology component to this route. The key features identified for the Metro Rapid Phase II expanded system are those that would be implemented for the

[1] Note that this document is a CEQA-only document, not a combined NEPA/CEQA document and therefore is a Final EIR as opposed to a Final EIS/EIR.

Wilshire BRT project. One feature, the Exclusive Lane Component, would only be implemented if approved by local cities/jurisdictions.

Table 2-1 Key BRT Features

Curitiba Key Features	Metro Rapid	
	Phase I Demonstration	Phase II Expanded System
1. Simple Route Layout	Yes	Yes
2. Frequent Service	Yes	Yes
3. Headway-based Schedules	Yes	Yes
4. Less Frequent Stops	Yes	Yes
5. Level Boarding and Alighting	Yes	Yes
6. Color-coded Buses and Stations	Yes	Yes
7. Bus Signal Priority	Yes	Yes
8. Exclusive Lanes	No	Yes (peak only)
9. Higher Capacity Buses	No	Yes
10. Multiple Door Boarding and Alighting	No	Yes
11. Off-Vehicle Fare Payment	No	Yes
12. Transit Feeder Network	No	Yes
13. Coordinated Land Use Planning	No	Yes

2.3 WHAT WAS CONSIDERED IN DRAFT EIS/EIR

Initially in the Mid-City/Westside environmental process, only one alternative was considered for the Wilshire Boulevard BRT project: a "Baseline" route, which included two exclusive parallel bus lanes operating 24 hours a day in the median of Wilshire Boulevard. However, during preparation of the Draft EIS/EIR, communities raised concerns regarding the severity of the potential impacts to Wilshire Boulevard from this alternative, particularly the loss of the landscaped medians, loss of metered parking, and the inconvenience of increased circulation resulting from the removal of left turn lanes. As a result, two Busway design options were developed to address these concerns: Alternative 1A, which would construct the Busway in the lanes on either side of the existing median, and Alternative 1B, which would shift the Busway to the two curb lanes along either side of Wilshire Boulevard. All three exclusive-lane, 24-hour Busway alternatives were then fully evaluated in the Draft EIS/EIR (see Figure 2-3).

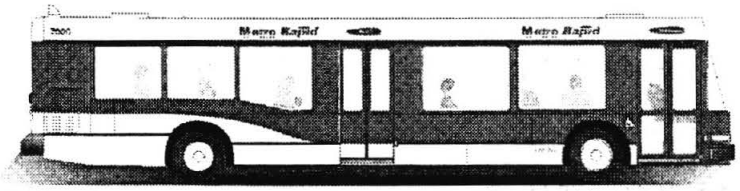
The Draft EIS/EIR evaluation concluded that the design options provided benefits to the Baseline Wilshire route but still resulted in significant impacts. Landscaped medians would be retained under both Alternatives 1A and 1B. Left-turn lanes would also be preserved under both design options. However, safe weaving into the left-turn lane remained an unresolved issue under Alternative 1A and right-turn conflicts for vehicles wishing to make right turns across the designated curb lane Busway remained unresolved for Alternative 1B. In addition, even the design options did not reduce the significance of the impacts from the loss of on-street parking and the loss of travel lanes.

METRO RAPID

Metro Rapid is a new MTA bus service designed to provide faster regional travel for patrons. Service began on June 24, 2000 on Wilshire/Whittier and Ventura Boulevards.

The key features of Metro Rapid that make it faster and easier to use are:

- Simple Route Layout
- Frequent Service
- Fewer Stops
- Level Boarding
- Color-coded Buses and Stops
- Bus Priority at Intersections
- "Next Bus" Messaging Sign





BRT

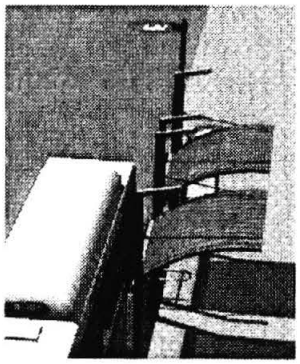
Bus Rapid Transit is proposed to add several advanced bus technology components to Metro Rapid.

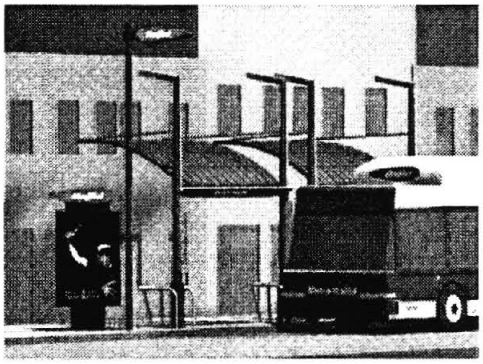
The key features include:

- High Capacity Vehicles
- More Seats
- Less Crowding
- 3-Door Boarding & Exiting
- Expanded Signal Priority
- Segments of Peak-Hour Dedicated Lanes

Metro Rapid stations stops feature the following amenities for transit users:

- an illuminated **flagpole** sign to make the stop easy to find
- a "**gate**" which marks the precise location of the bus entry door to expedite boarding
- a translucent **canopy** for protection from rain and sun
- nighttime **illumination** of the sidewalk for greater security
- electronic, changeable message sign with real-time bus **arrival** information
- illuminated route **maps**, schedules, neighborhood information, and artwork
- stainless steel **lean-bars**
- special sidewalk **paving**









BRT station stops would include:

- Enlarged Canopy for 3-Door Buses
- Landscaping
- Off-Board Ticketing "Smart Card"
- Safety Phones
- Seating Areas
- Bus Route Information & Wayfinding to Local Destinations

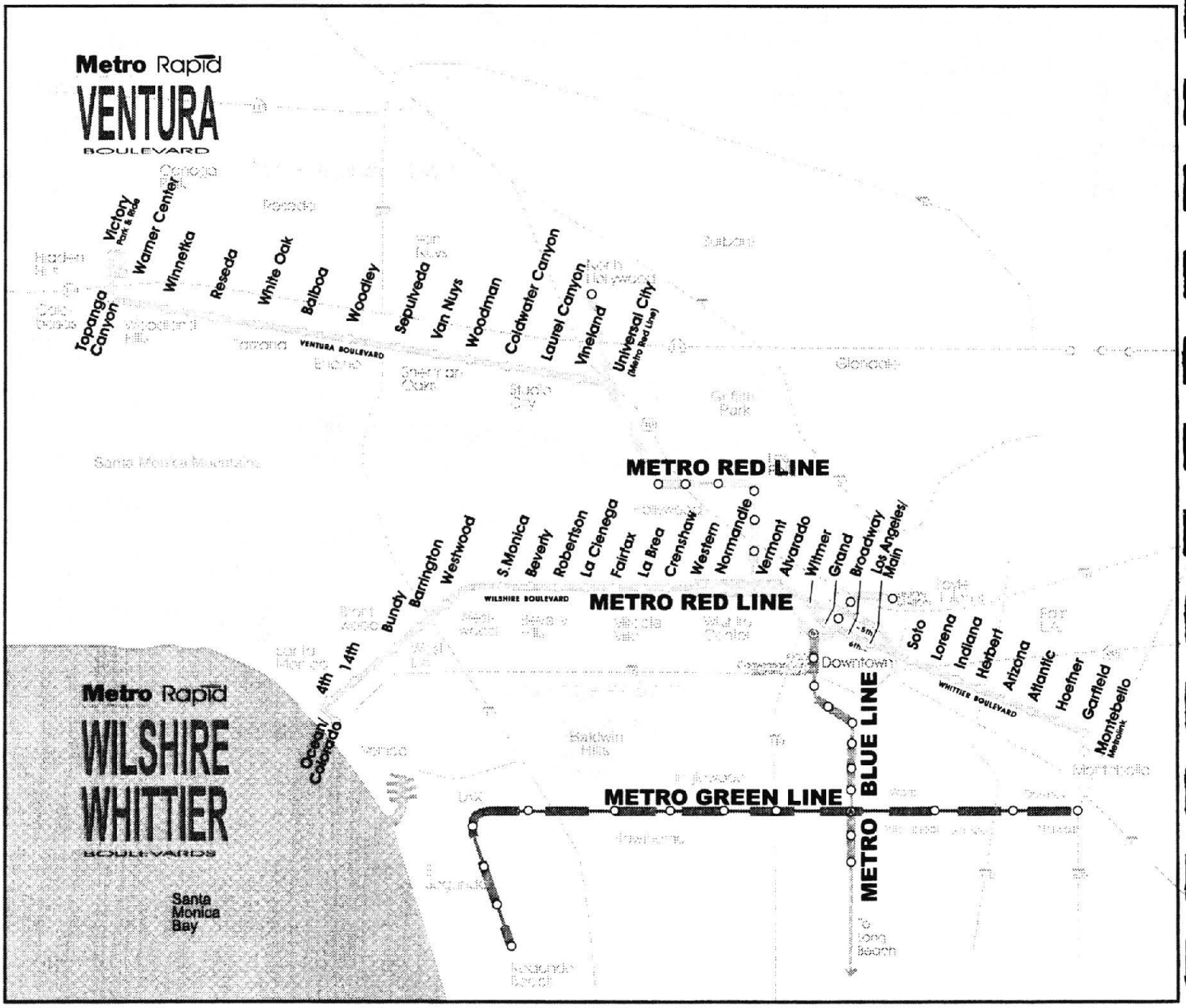
SOURCE: Suisman Urban Design, 2000

Mid-City/Westside Transit Corridor

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FIGURE 2-1

THE METRO RAPID PROGRAM



LEGEND:

- Metro Red Line
- Metro Blue Line
- Metro Green Line

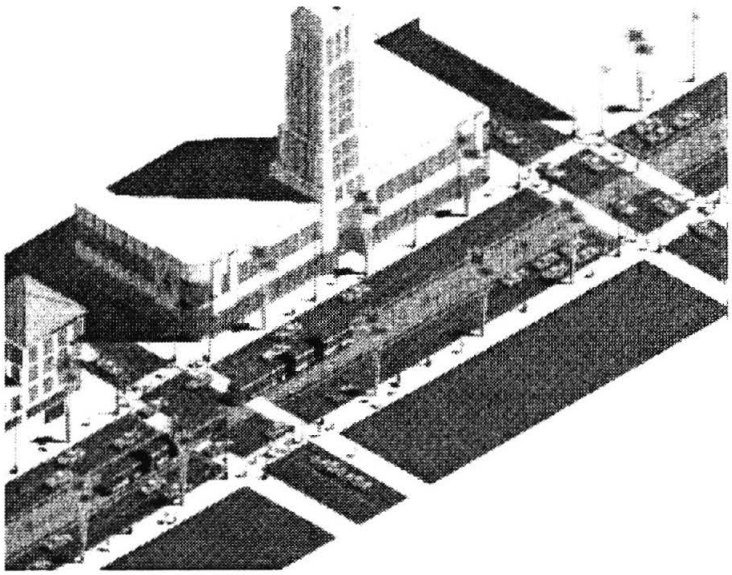
SOURCE: Suisman Urban Design, June 2000

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FIGURE 2-2

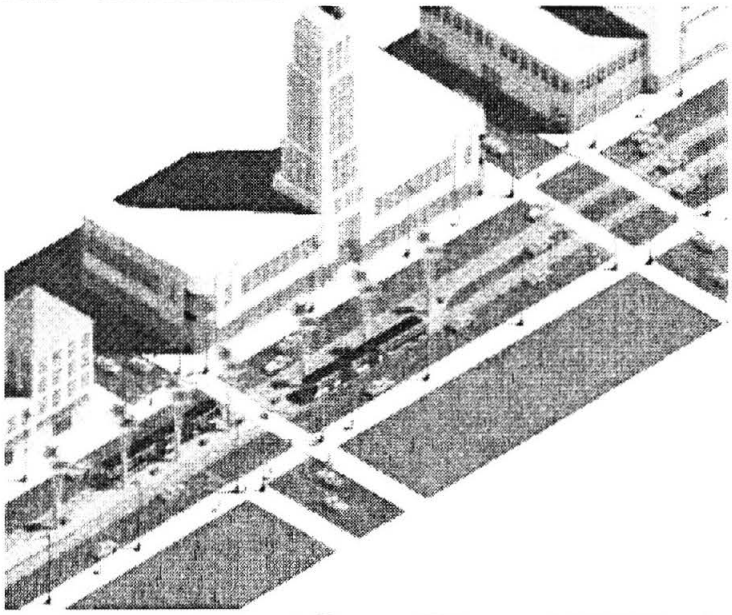
EXISTING METRO RAPID ROUTES



ALTERNATIVE 1 (MEDIAN RUNNING) (NOT SELECTED)

The baseline BRT design is taken literally from the busway in Curitiba, Brazil, in which the middle portion of the street is dedicated to an exclusive busway. This design would require the removal of existing landscaped medians in Wilshire Boulevard, and for this reason, was opposed by many Wilshire Boulevard stakeholders during the Scoping Workshops. As a result of these community comments, design options Alternatives 1A and 1B were developed to eliminate impacts to the medians, as well as to provide greater design flexibility to deal with other environmental impacts such as loss of left turn pockets and loss of on-street parking. These features can be retained under Alternatives 1A and 1B.

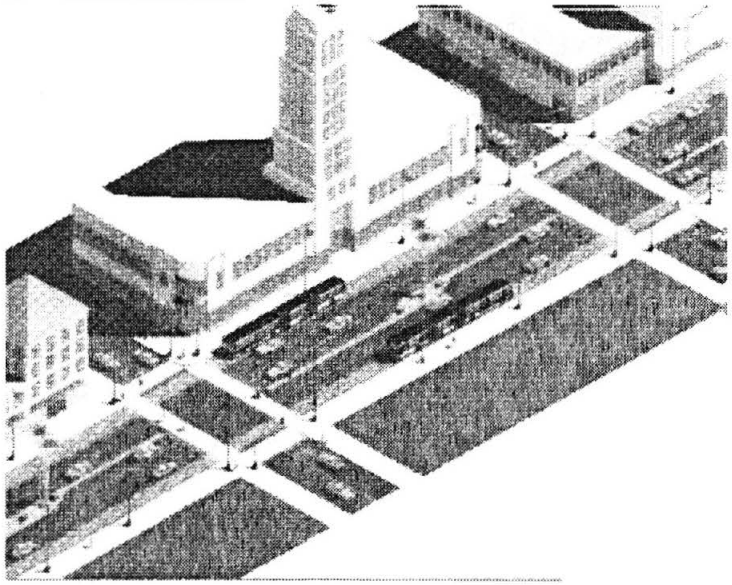
Eliminated: Due to community concerns regarding the loss of travel lanes, on-street parking, left-turn lanes, and landscaped medians.



ALTERNATIVE 1A: MEDIAN ADJACENT (NOT SELECTED)

The Median Adjacent design option would preserve the existing medians along Wilshire Boulevard. The exclusive bus lane would be located in the lane next to the median. Where medians currently do not exist along Wilshire, new medians could be constructed. This concept could also preserve all existing left-turn lanes. It would require, however, that vehicles would have to transition across the exclusive bus lane to enter the left-turn pockets. Existing on-street parking could be retained in most areas if a peak period busway concept were developed instead of a 24-hour facility.

Eliminated: Would preserve landscaped medians and left-turn lanes. But eliminated due to impacts from loss of travel lanes and on-street parking.



ALTERNATIVE 1B: CURB LANE (ADOPTED)

The Curb Lane design option would also preserve the existing medians along Wilshire Boulevard. This option would require the reconstruction of the outside curb lane to create a flat driving surface to remove the dips and cross street crowns. This option would bring buses directly adjacent to the sidewalk. This would likely result in reduced travel speeds for BRT compared to the median option because the BRT would be in the same lane with local buses and right-turning vehicles. Existing on-streetparking could be retained in most areas if a peak period busway concept were developed instead of a 24-hour facility. A curbside bus lane is currently in operation in Downtown Los Angeles on Figueroa Street as a north-bound AM peak period transit lane.

SOURCE: Suisman Urban Design, 200

FIGURE 2-3
DRAFT EIS/EIR WILSHIRE BRT
ALTERNATIVES CONSIDERED

In fact, the Draft EIS/EIR concluded that all three alternatives would result in the need for a replacement parking strategy to address the loss of parking, and all three alternatives would cause the diversion of traffic to parallel routes because of the loss of travel lanes on Wilshire Boulevard.

During public circulation and review of the Draft EIS/EIR, the public and business community raised strong concerns regarding these two issues. In response to these concerns, MTA staff and consultants held discussions with the Wilshire communities to identify solutions. During these discussions, the participants identified that a peak-period only BRT in the curb lane would completely eliminate the parking impact through the Cities of Los Angeles and Beverly Hills since parking is already prohibited during the peak period at most locations in these areas. This would not be the case in Santa Monica where parking is allowed on a 24-hour basis. For this reason, no dedicated lane was proposed for Santa Monica. Through this process, the Locally Preferred Alternative, as defined below, was developed.

2.4 DESCRIPTION OF THE LOCALLY PREFERRED ALTERNATIVE (LPA)

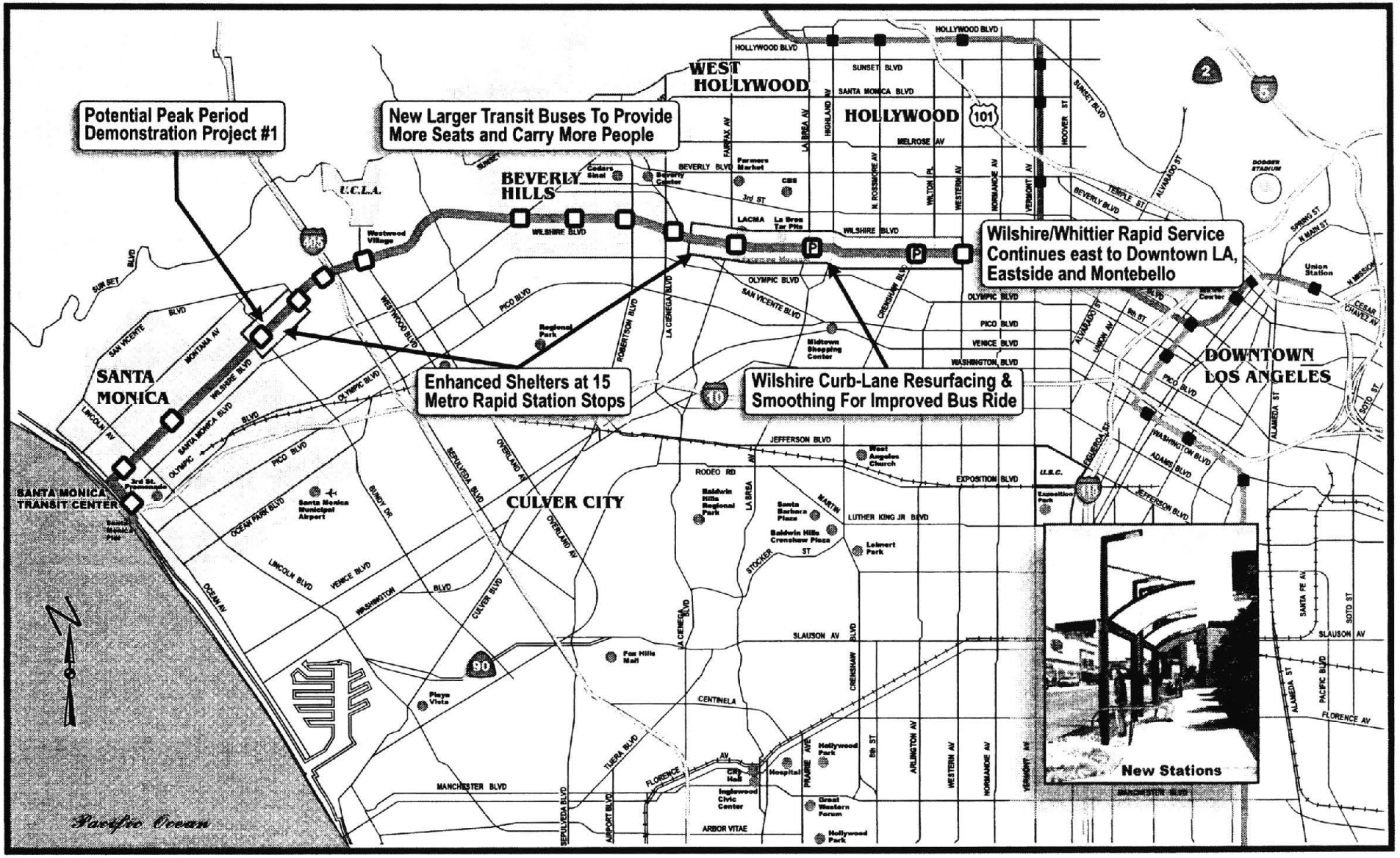
The Locally Preferred Alternative (LPA) for this Final EIR is the Wilshire Bus Rapid Transit (BRT) project, ultimately operating in a peak period dedicated curb lane in Los Angeles and Beverly Hills, and in mixed traffic lanes in Santa Monica and the residential section of Westwood. Implementation of the dedicated lane component of the project would be subject to the approval of each city/jurisdiction, following the testing of the concept in selected segments. During off-peak hours, the entire route would operate in mixed flow traffic. The LPA extends from Wilshire/Western in the City of Los Angeles to Ocean/Colorado in the City of Santa Monica (approximately 13.2 miles). The generalized route of the Wilshire BRT project is shown in Figure 2-4. Specific details regarding the LPA are presented below. Plan and profile engineering drawings of the LPA are included in Volume II of the FEIR.

2.4.1 BRT Project Elements

Figure 2-5 illustrates the typical station for the Wilshire BRT project. Table 2-2 presents a list of project components and the areas in which they would occur. These include: provision of new higher capacity bus transit vehicles, reconstruction of the curb lane in some locations, provision of enhanced station shelters and station landscaping, construction of bus pads, and provision of parking lots in two locations.

As shown in this table, some reconstruction of the curb lane would occur along Wilshire Boulevard to provide a smoother street profile (see the description of the construction scenario below for more details). The smoother profile would give a more comfortable ride to patrons.

The Wilshire BRT project would include 15 curbside stations, with an optional station in Santa Monica on Ocean Avenue between Broadway and Santa Monica Boulevard, subject to approval by the City of Santa Monica. All stations would be split platforms and located on either side of the street to serve westbound or eastbound travel



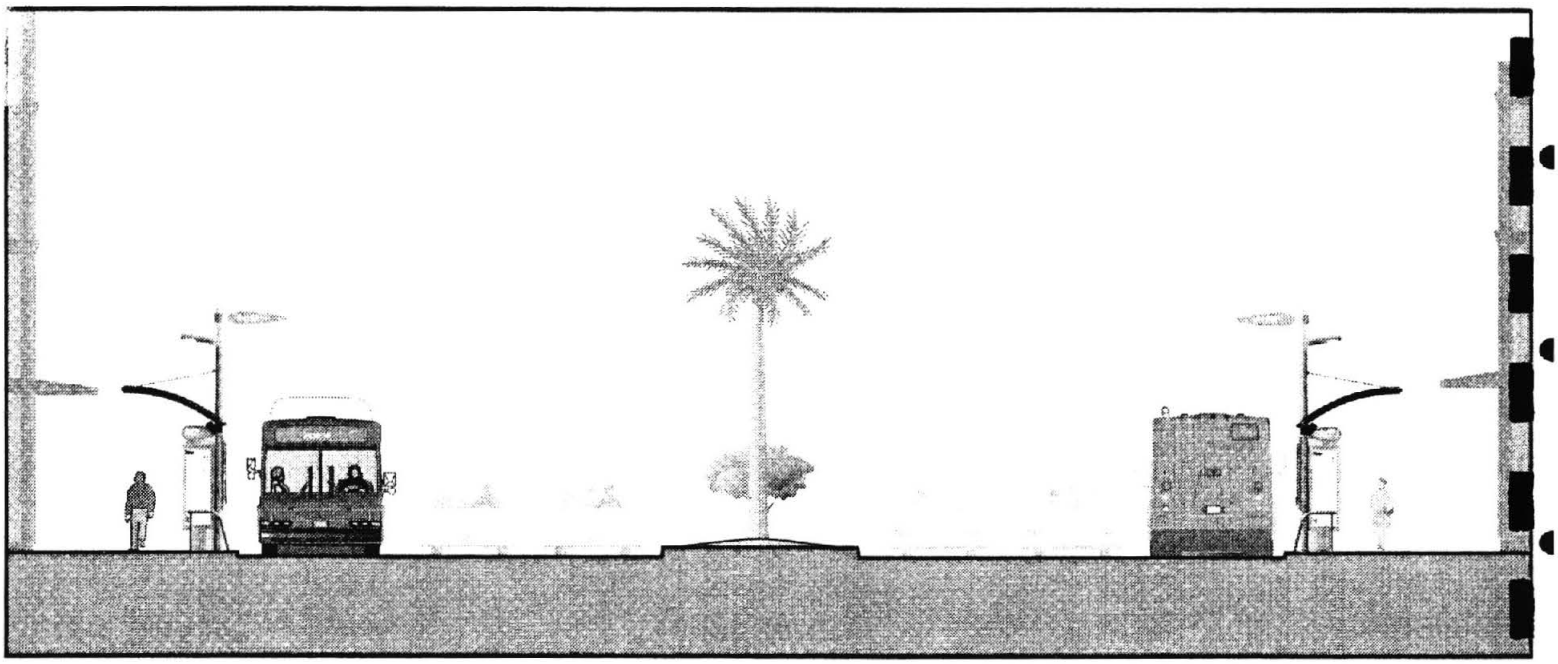
SOURCE: Los Angeles County Metropolitan Transportation Authority, 2002

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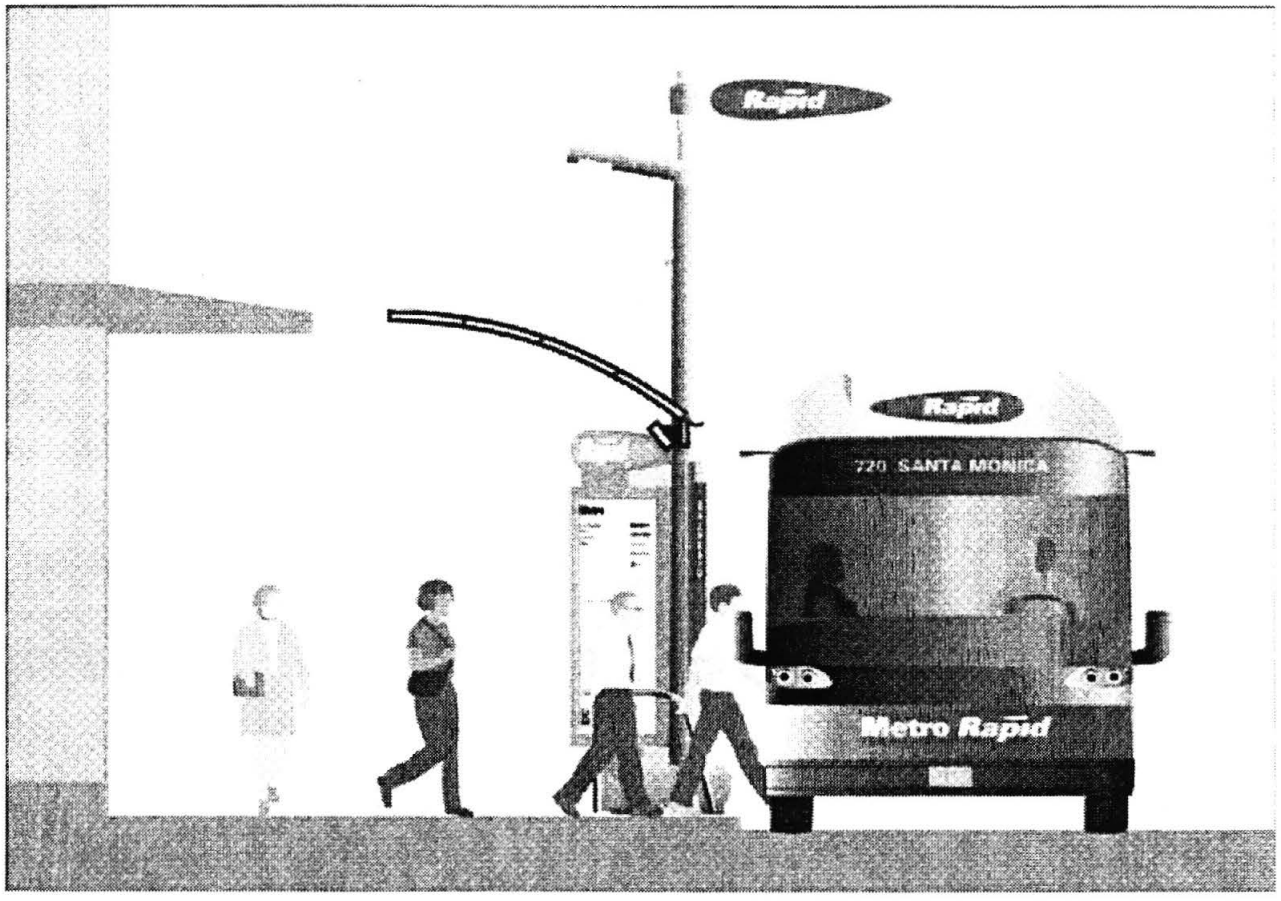
LOS ANGELES COUNTY METROPOLITAN TRANSPORTATION AUTHORITY

FIGURE 2-4

WILSHIRE BUS RAPID TRANSIT (BRT) PROJECT



CROSS-SECTION



STATION

SOURCE: Suisman Urban Design, 2000

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FIGURE 2-5
WILSHIRE BRT TYPICAL
CROSS-SECTION AND STATION

demand. Enhanced shelters and landscaping would be provided at stations. More detail about each station is presented below.

Concrete bus pads would be constructed at station locations where they do not presently exist. The bus pads are approximately eight-inch concrete pads designed to enhance the acceleration of the bus from a stopping position.

Table 2-2 LPA Components by Neighborhood

	Wilshire Center	Park Mile	Miracle Mile	Beverly Hills	Westwood	County of Los Angeles (VA)	West Los Angeles	Santa Monica
New Higher Capacity Bus Transit Vehicles	X	X	X	X	X	X	X	X
Enhanced Station Areas, Shelters and Landscaping	X	X	X	X	X	X	X	X
Curb Lane Repair and Reconstruction	X	X	X					
Bus Stopping Pads	X	X	X		X	X	X	
Parking Facilities		X	X					
Bus Maintenance Facility	Located in Downtown Los Angeles							
Peak Period Dedicated Transit Lanes	Subject to further testing & approvals by each city jurisdiction							

Source: MTA, 2002

Parking would be provided in two existing facilities along the route: Wilshire Boulevard/La Brea Avenue and Wilshire Boulevard/Crenshaw Boulevard (see below for more detail).

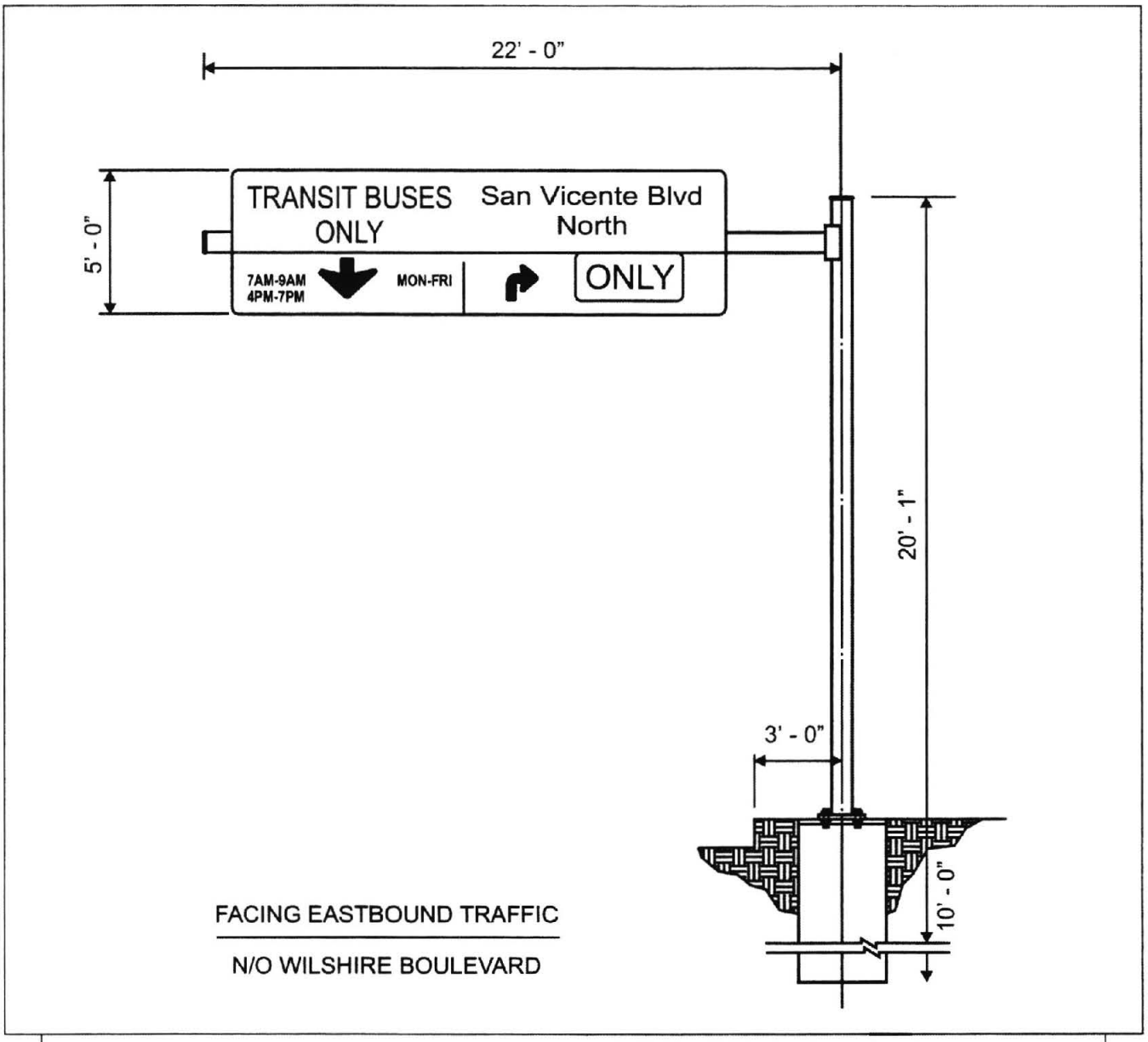
The landscaped medians in Wilshire Center (Western Avenue to Gramercy Place) and Miracle Mile (Orange Drive to Fairfax Avenue) would be entirely preserved, as would left-turn pockets.

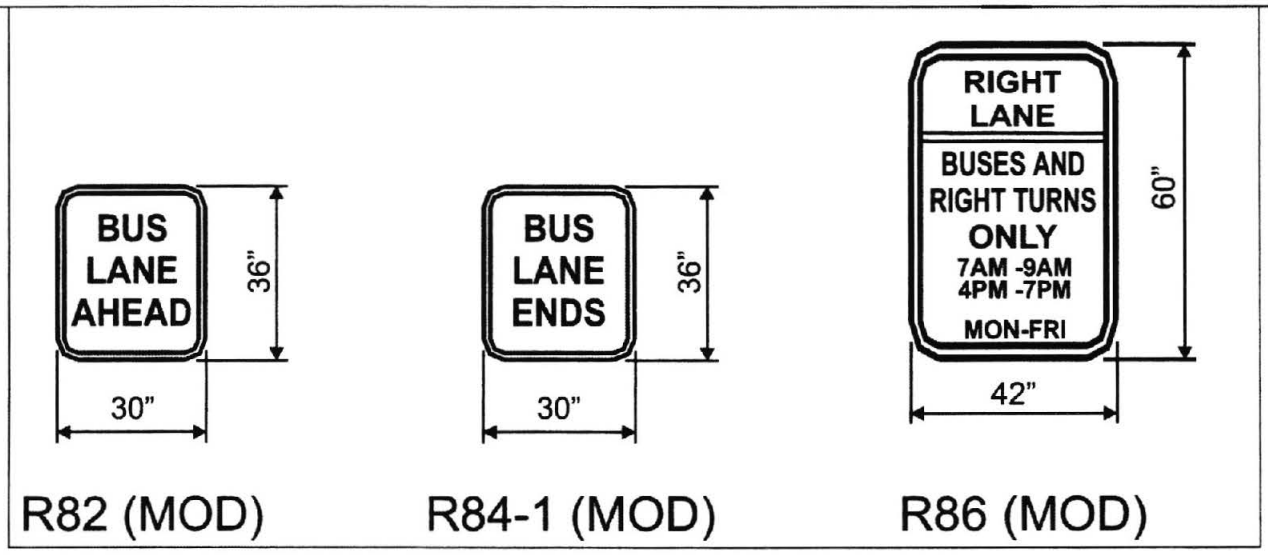
Typical signage and striping for the Wilshire BRT is shown in Figures 2-6 and Figure 2-7.

Depending on location, the width of the bus lane would range from 10.5 feet to 12 feet. All existing left-turn movements would be retained with no conflicts with the Wilshire BRT operation. Right-turn movements would also be retained, with vehicles turning into the Wilshire BRT lane just before making their turn, similar to what now happens on Figueroa Street in downtown Los Angeles. To discourage vehicles from beginning a right turn movement too soon, traffic dots would separate the Wilshire BRT lane from the regular traffic lane except at the actual area of shared use. This and special signal timings would serve to minimize safety concerns.

2.4.2 BRT Service Characteristics

The Wilshire BRT LPA is intended to provide high capacity transit service to the Westside for a relatively low capital cost. Bus operations of the Wilshire BRT LPA are based on existing Metro Rapid service per MTA Line 720. In essence, the same Metro Rapid routes would be operating but would be able to take advantage of the dedicated bus lanes during the peak period. Similar to the level of Metro Rapid service in operation now, service



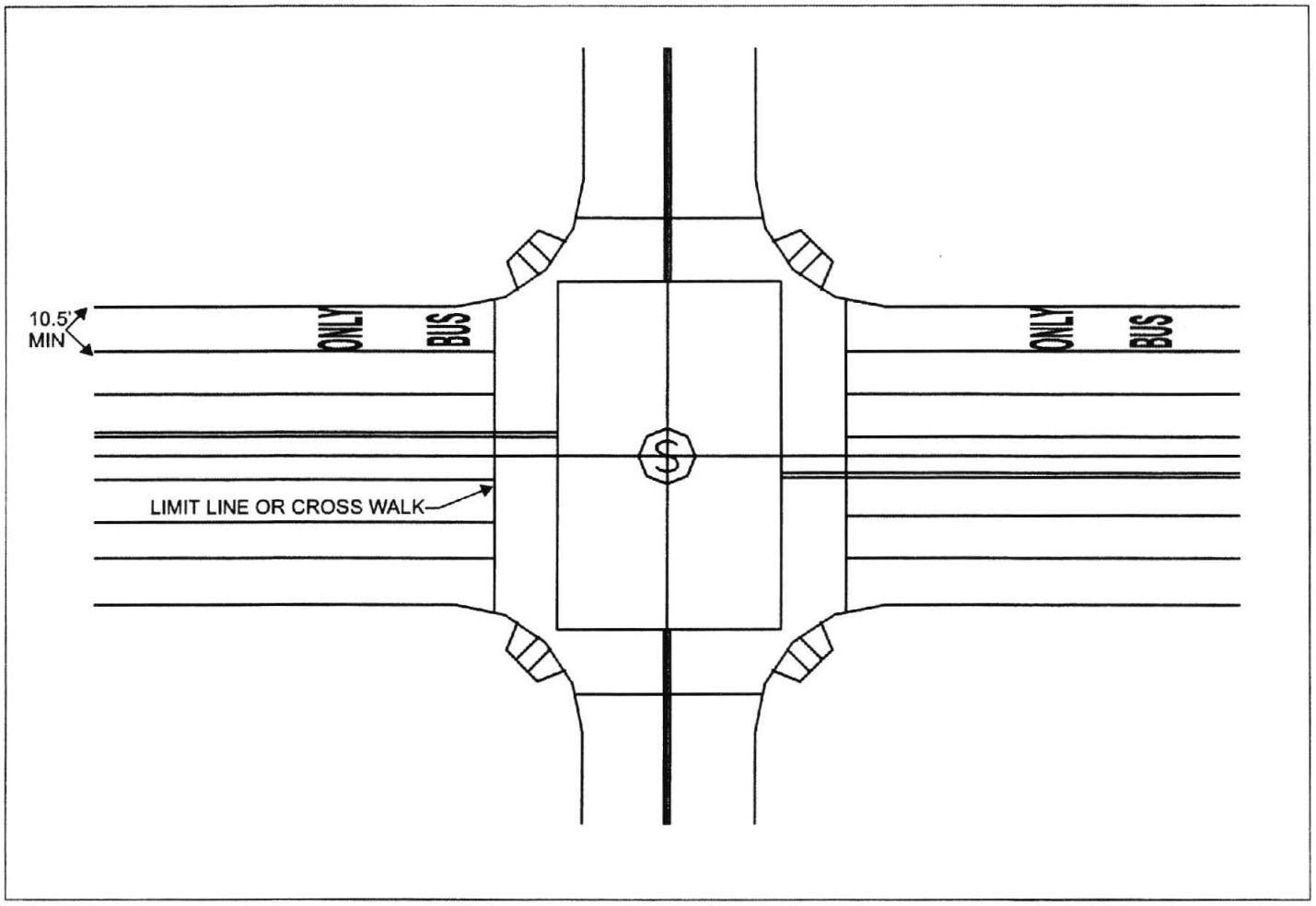


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FIGURE 2-6

TYPICAL BUSWAY SIGNS



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FIGURE 2-7

TYPICAL BUS ONLY LANE SIGNAGE

frequencies would range from two to five minutes in the peak period and five to ten minutes in the off-peak period.

The Wilshire BRT LPA would also improve upon the Metro Rapid Bus through the use of expanded signal priority treatment. Signal modifications will provide the bus with "priority" at intersections. As the bus approaches an intersection, a preemptive device "triggers" the traffic signal to extend "green time" for the bus to pass through the intersection or shortens the north-south green time so the green light for the bus will be activated.

Ridership projections indicate that single-articulated (60-foot-long) buses would be able to accommodate demand in the beginning years of service. These vehicles would provide an average seated capacity of 65 passengers, with space available for another 13 to 30 standees. Figure 2-8 shows BRT vehicles, varying in length from 40 feet to 80 feet and a new hybrid rubber-tire vehicle. Techniques to reduce dwell times will be pursued where practical, such as proof of payment fare collection, and allowing passenger boarding and alighting through both front and rear doors of the bus.

Existing local bus service will continue to run on Wilshire Boulevard (MTA 20 series and Santa Monica Municipal Bus Line 2). A summary of operating characteristics for the Wilshire BRT LPA is provided in Table 2-3.

Table 2-3 Wilshire BRT LPA Operating Characteristics

Transit Service	Existing Wilshire/Whittier Metro Rapid Bus routes use BRT lanes from Santa Monica City limit to Western Avenue. Assumes similar service frequencies to existing Metro Rapid service, approximately 2-5 minute headways in peak and 5-6 minutes in off-peak.
Operations	Single-articulated buses (60 feet long) would be used. Average dwell time of 30 seconds is assumed, which may require facilitated boarding/alighting methods such as proof of payment fare collection and boarding/alighting through both front and rear doors.
Max Speed	35 mph
Average Speed	19–21 mph along BRT segment, including stops and delays at intersections; 16–17 mph average from downtown Santa Monica to downtown Los Angeles. Off-peak speeds average 14–16 mph.
Signal Preemption	For transportation model purposes, partial signal preemption assumed at major intersections and full preemption assumed at minor intersections.
Transit Running Time	57–60 minutes during peak and 70 minutes during off-peak from downtown LA (5th/Grand) to downtown Santa Monica.

Source: Manuel Padron Associates, 2001

2.4.3 BRT Stations

The BRT stations would be located either at the same location, or very close to the existing Metro Rapid Bus stops. Aerial photographs showing the station areas are presented in Figures 2-9 through 2-15. These figures also provide a brief description of the amenities proposed at each site.

40'

Vehicle

Low-floor compressed natural gas vehicles manufactured by NABI. Began service on Wilshire/Whittier and Ventura Boulevards in June 2000.



60'

Vehicle

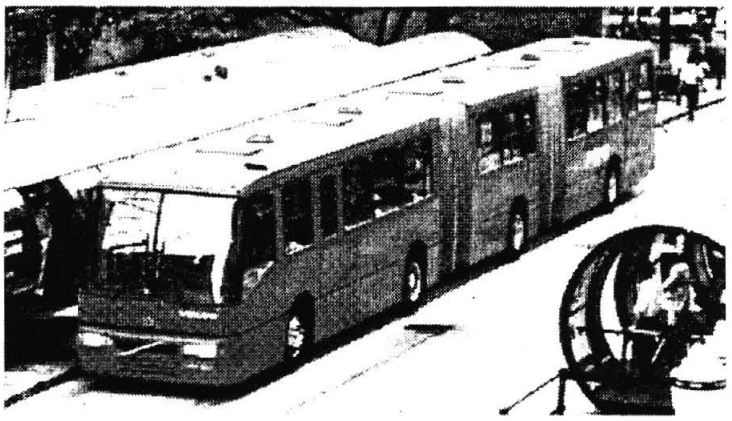
60' "articulated" (two section) low-floor rubber-tired vehicle.



80'

Vehicle

These 80' "bi-articulated" (three section) low-floor rubber-tired vehicle are in use in Curitiba, Brazil. These are not being considered for implementation in the Wilshire Corridor at this time because of street capacity constraints.



New

Vehicles

New Hybrid rubber-tired vehicles such as Bombardier's "Guided Light Transit" (left) and Matra/ Renault's Civis (right) are being tested in several French cities, and could be considered for Los Angeles BRT.



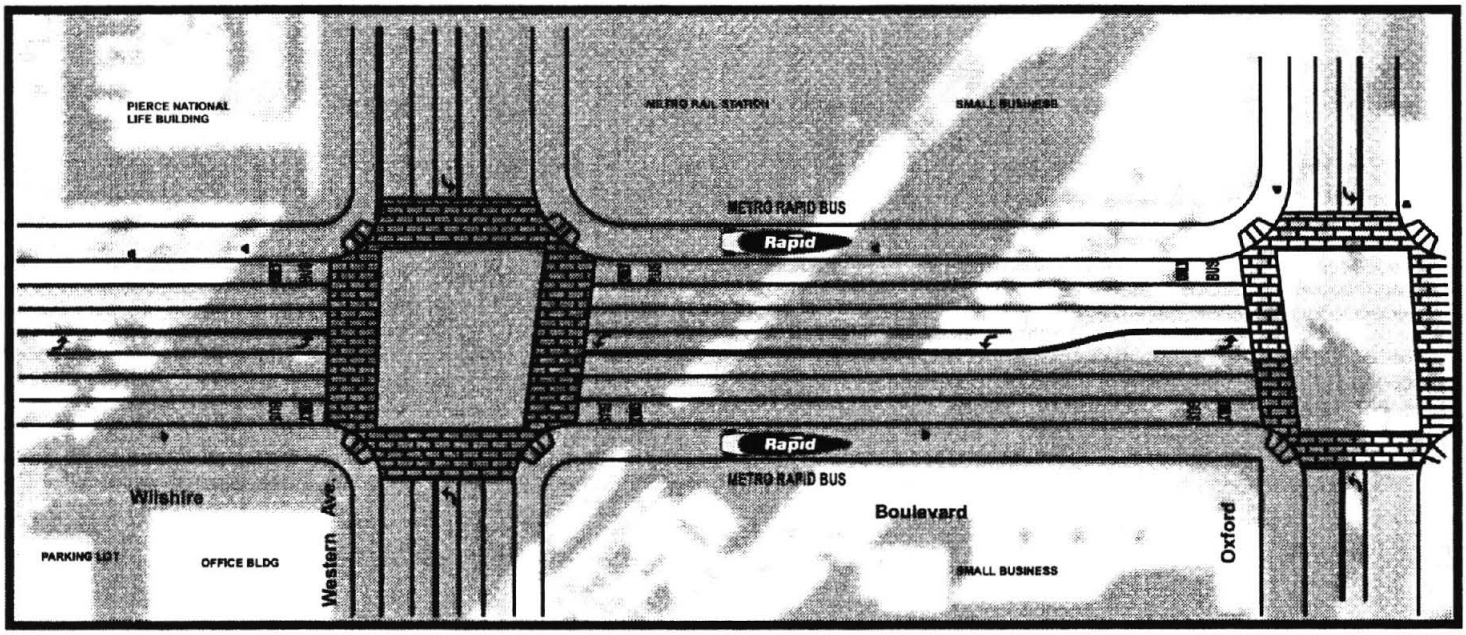
SOURCE: Suisman Urban Design, 2000

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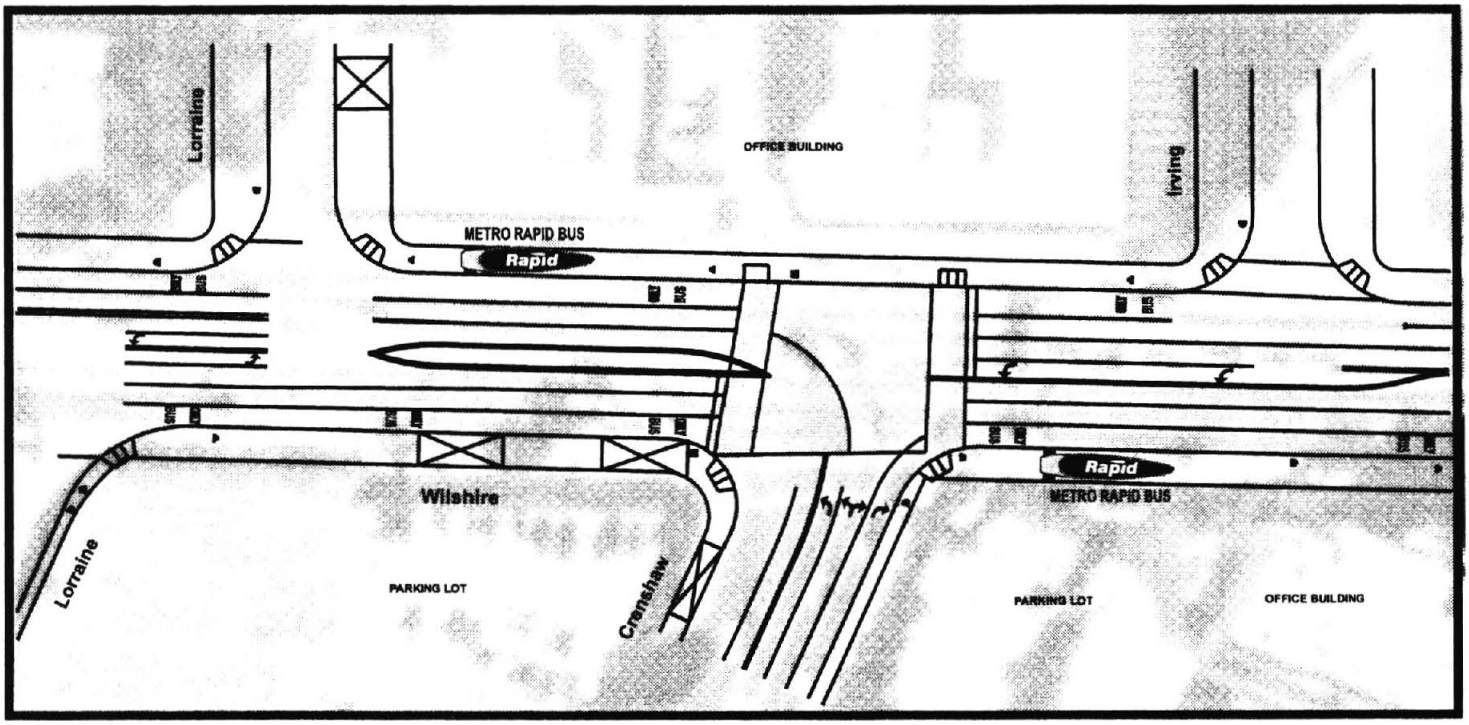
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FIGURE 2-8

BRT VEHICLES



Western Station



Crenshaw Station

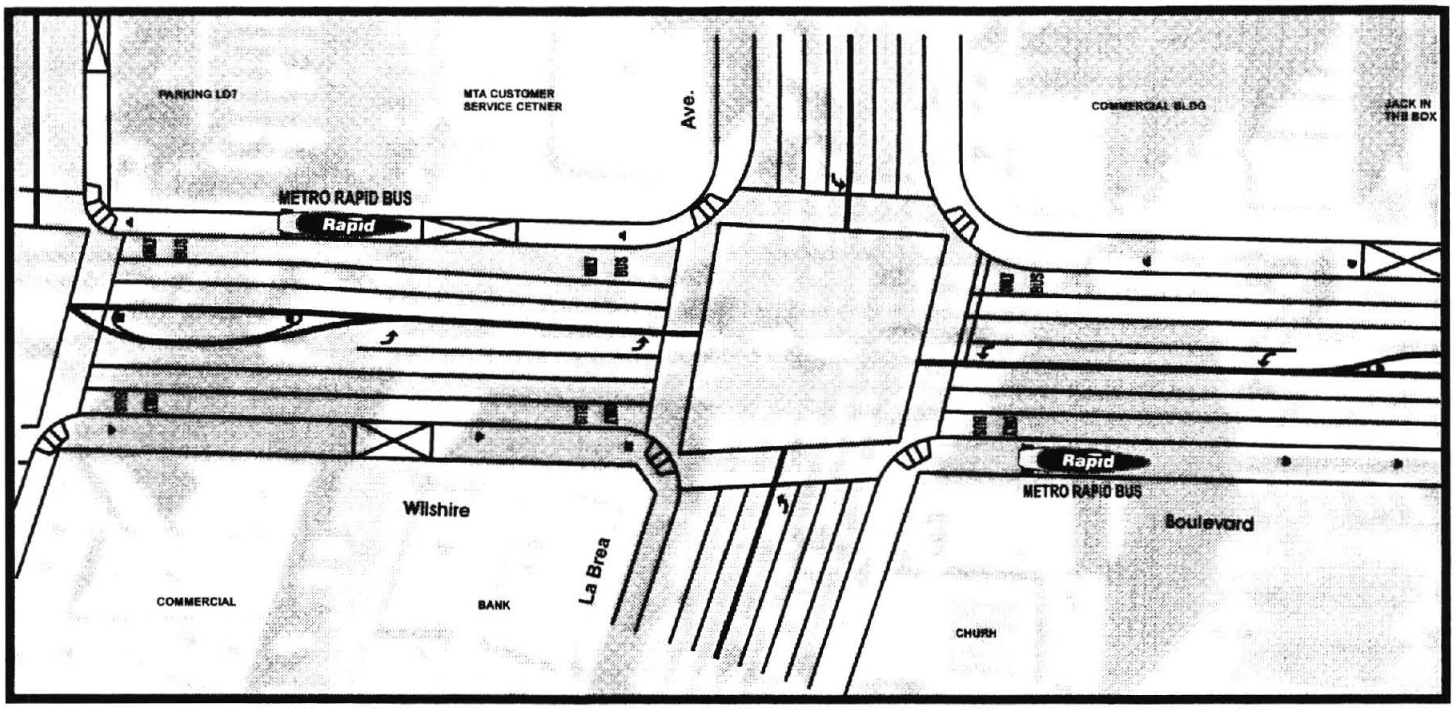
SOURCE: Korve Engineering, 2002

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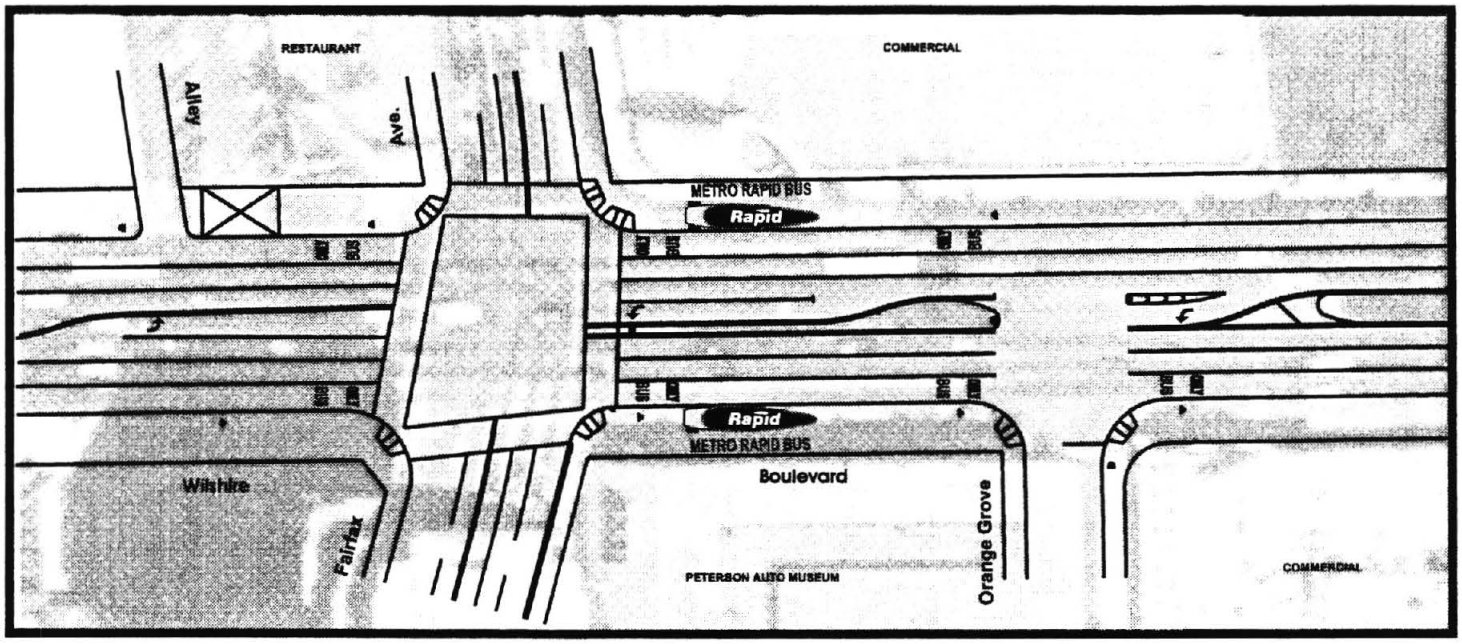
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FIGURE 2-9

WESTERN & CRENSHAW STATIONS



La Brea Station



Fairfax Station

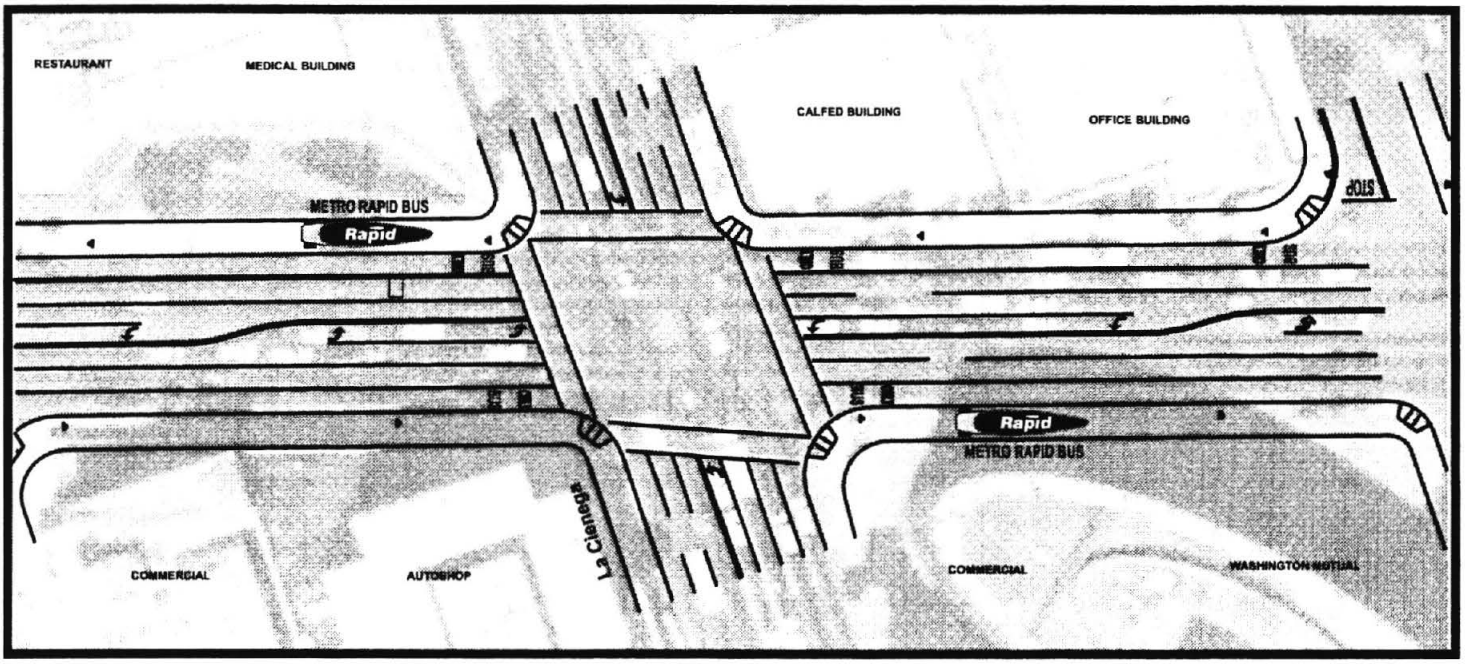
SOURCE: Korve Engineering, 2002

Mid-City/Westside Transit Corridor

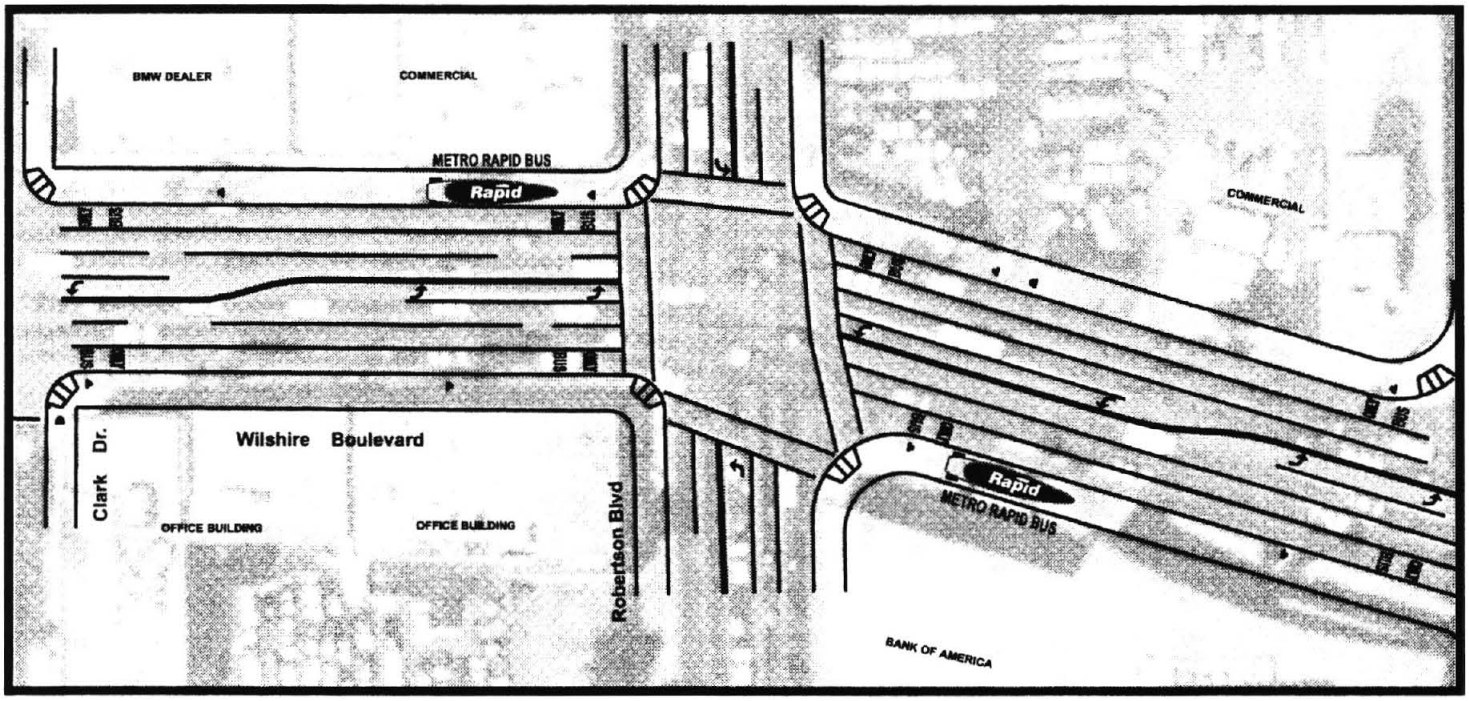
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FIGURE 2-10

LA BREA & FAIRFAX STATIONS



La Cienega Station



Robertson Station

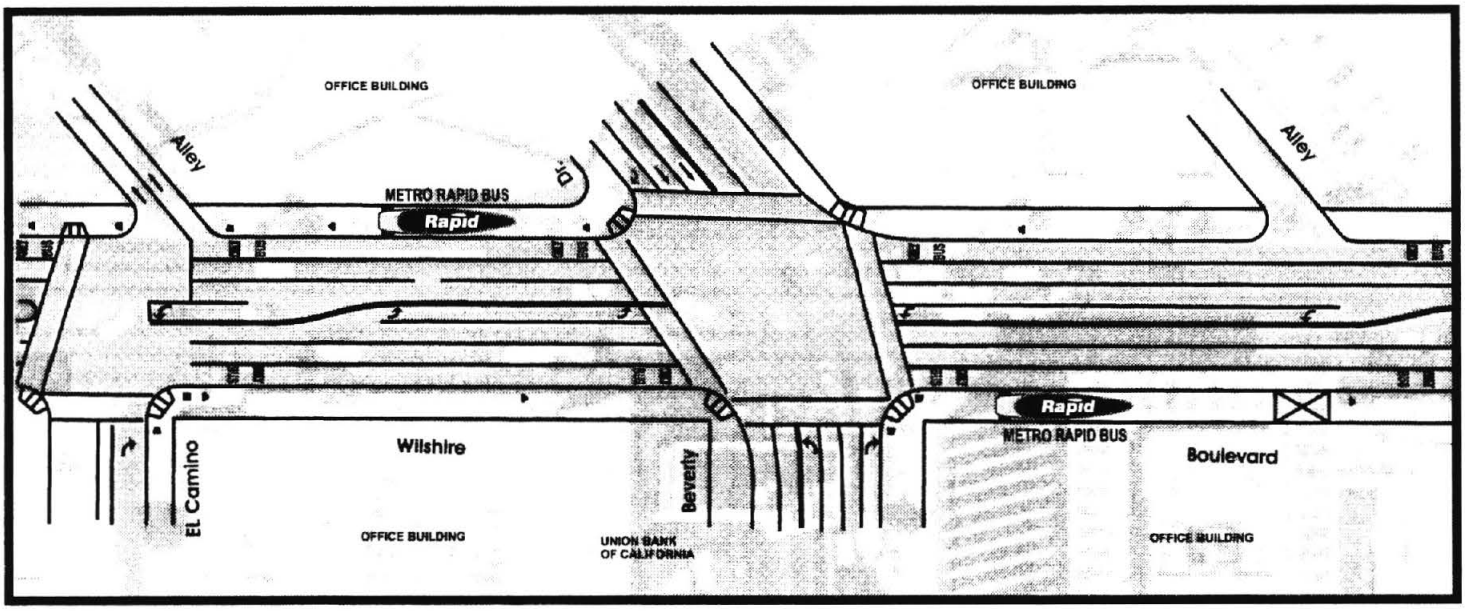
SOURCE: Korve Engineering, 2002

Mid-City/Westside Transit Corridor

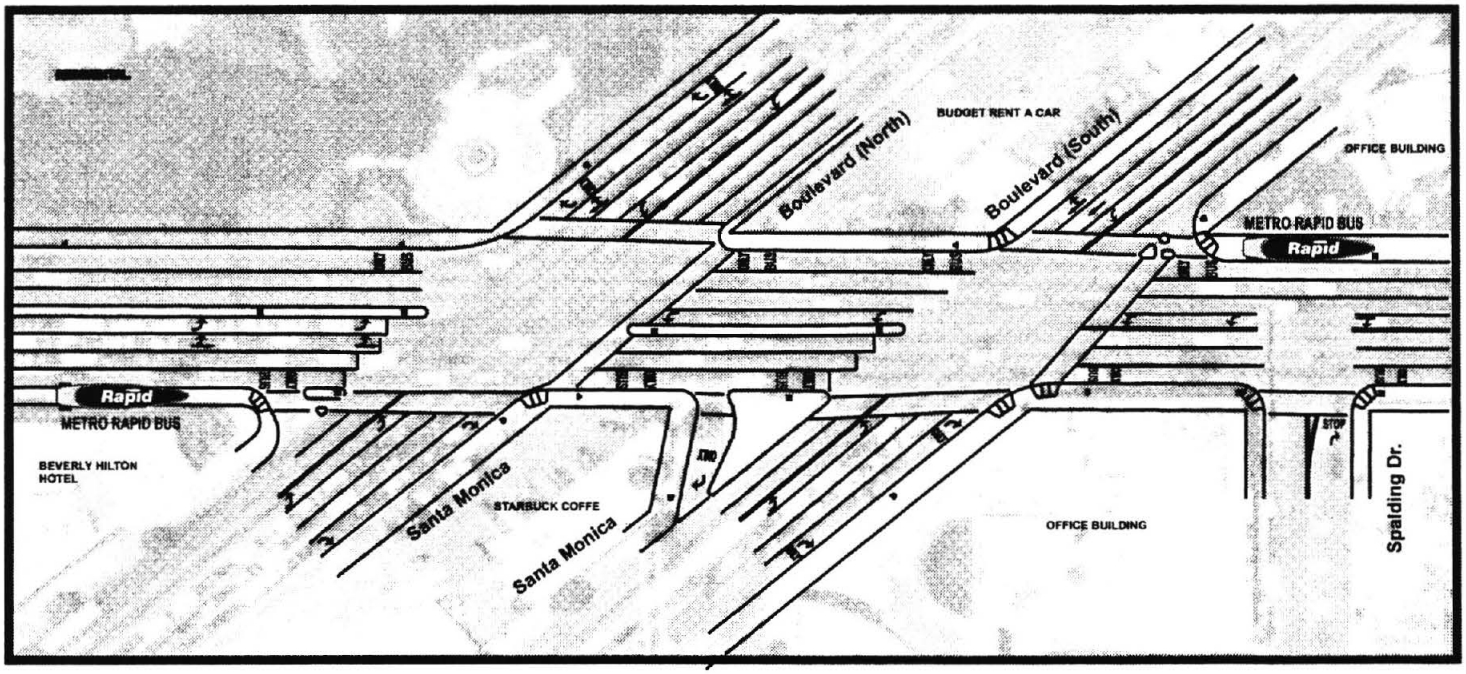
LOS ANGELES COUNTY METROPOLITAN TRANSPORTATION AUTHORITY

FIGURE 2-11

LA CIENEGA & ROBERTSON STATIONS



Beverly Station



Santa Monica Station

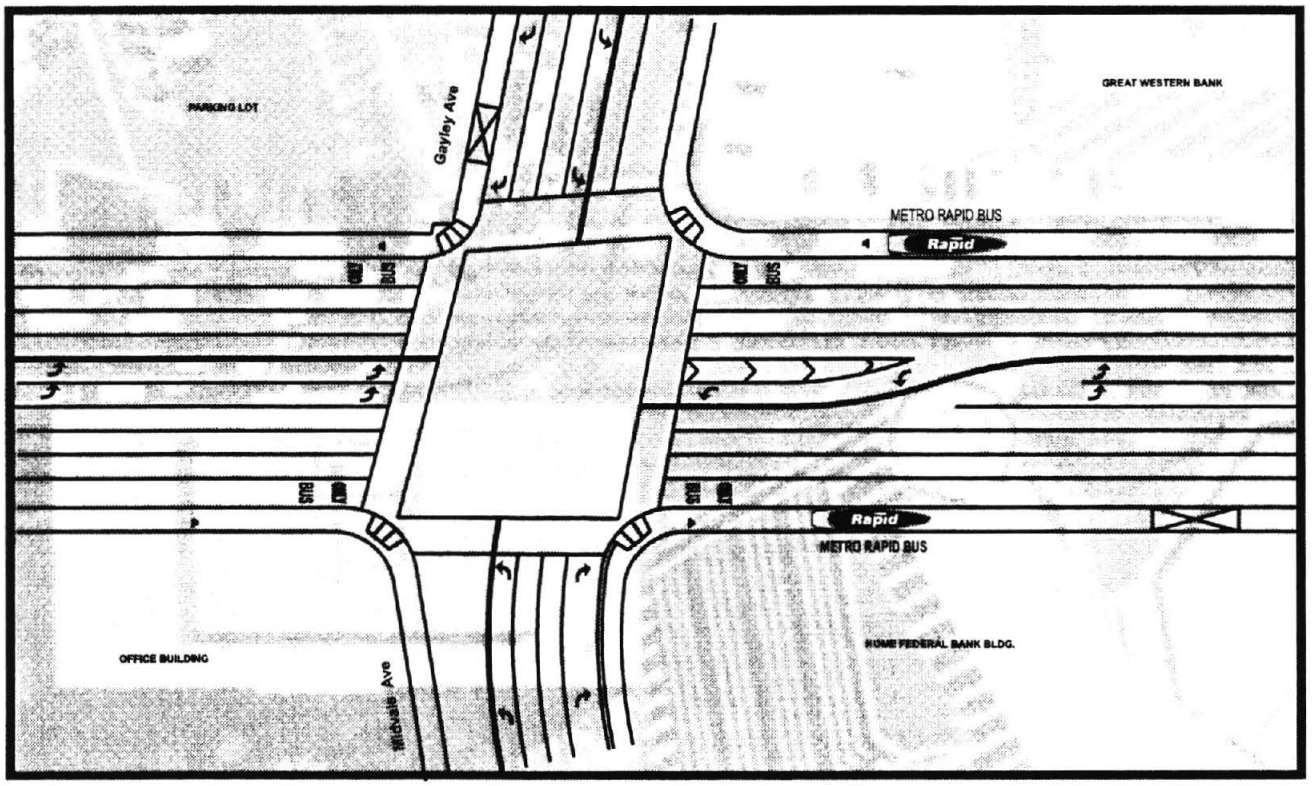
SOURCE: Korve Engineering, 2002

Mid-City/Westside Transit Corridor

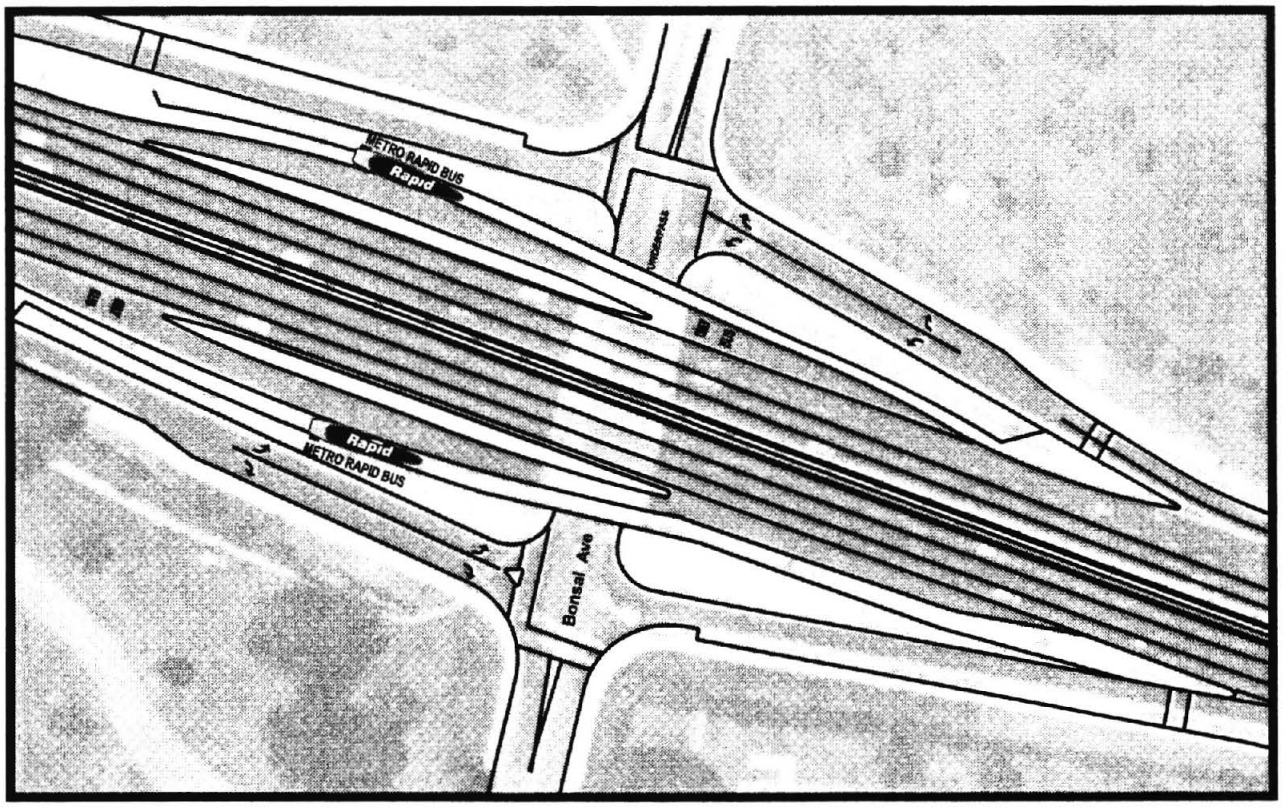
LOS ANGELES COUNTY METROPOLITAN TRANSPORTATION AUTHORITY

FIGURE 2-12

BEVERLY & SANTA MONICA STATIONS



Westwood Station



VA Hospital Station

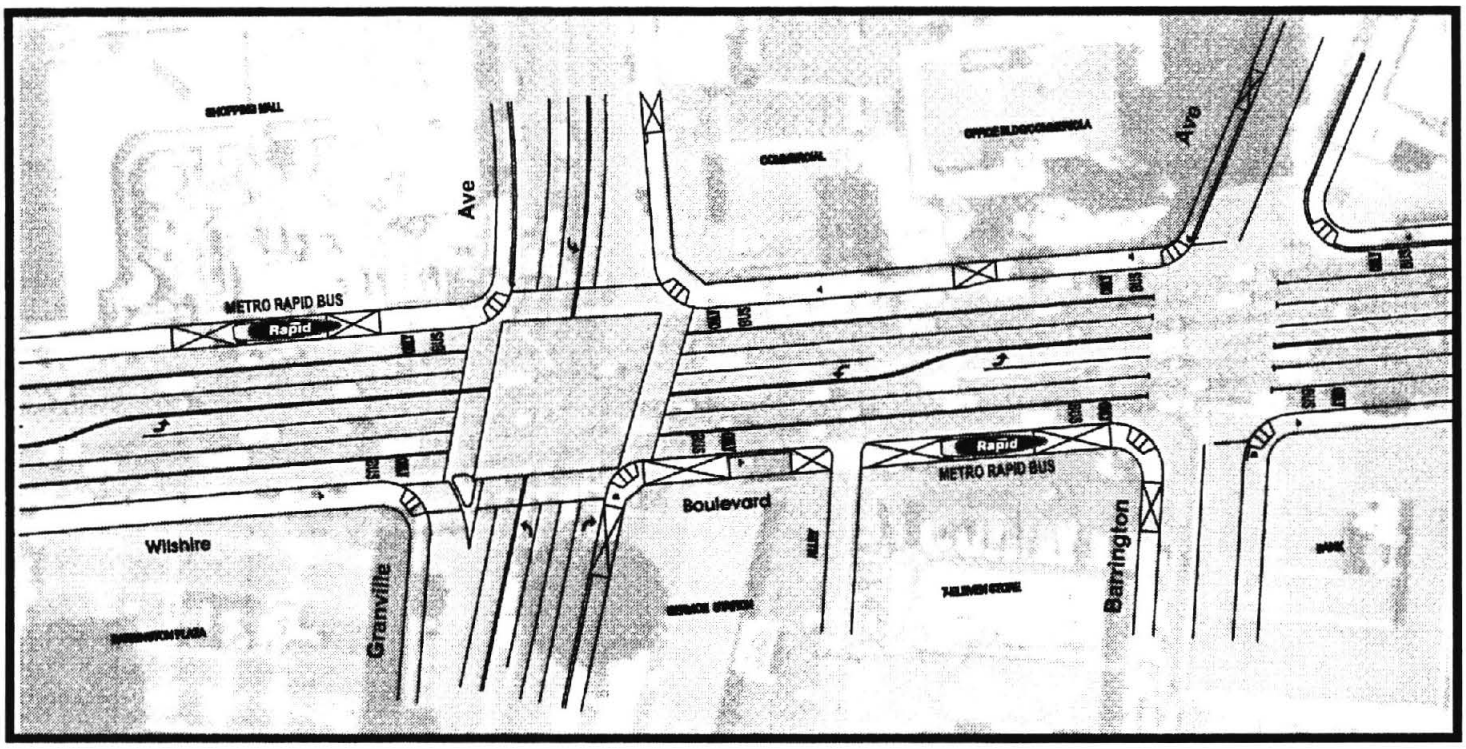
SOURCE: Korve Engineering, 2002

Mid-City/Westside Transit Corridor

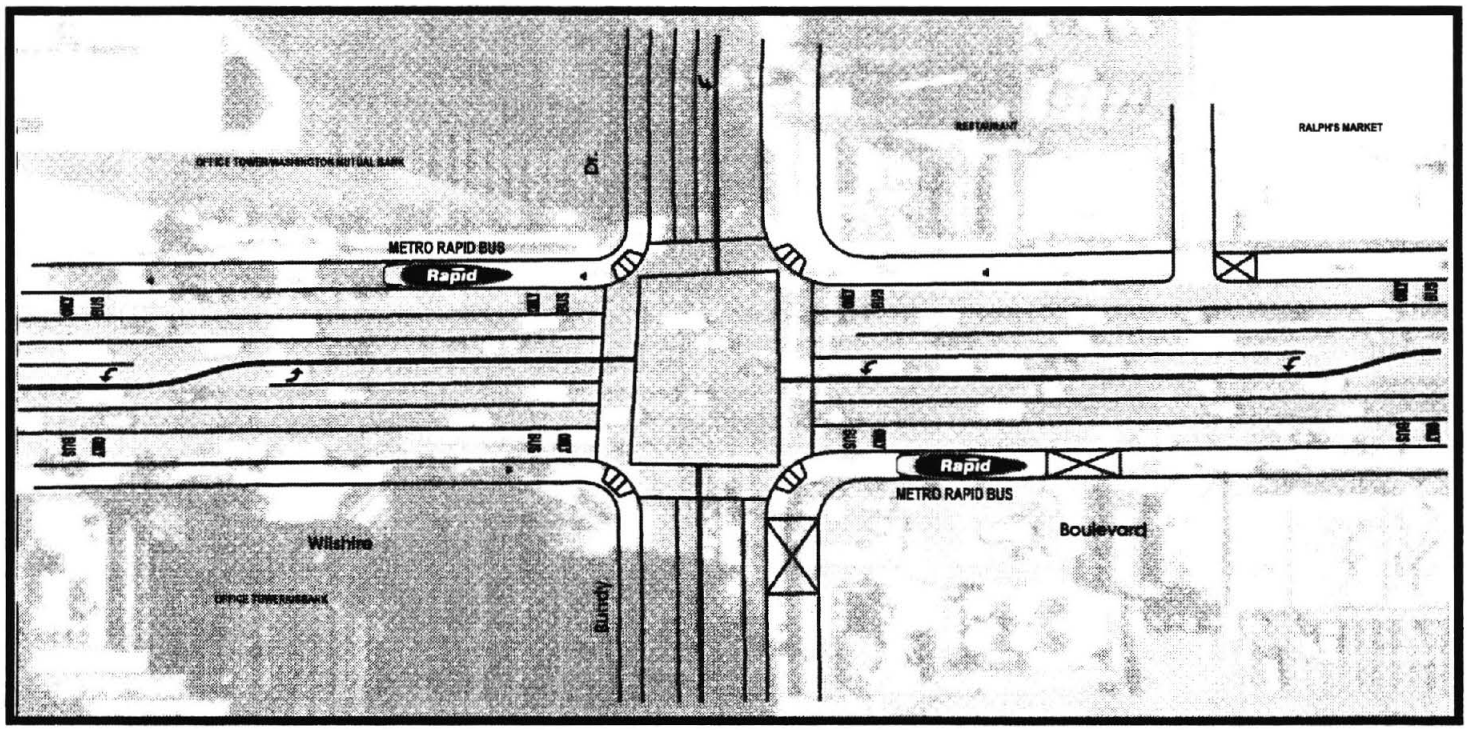
LOS ANGELES COUNTY METROPOLITAN TRANSPORTATION AUTHORITY

FIGURE 2-13

WESTWOOD & VA HOSPITAL STATIONS



Barrington Station



Bundy Station

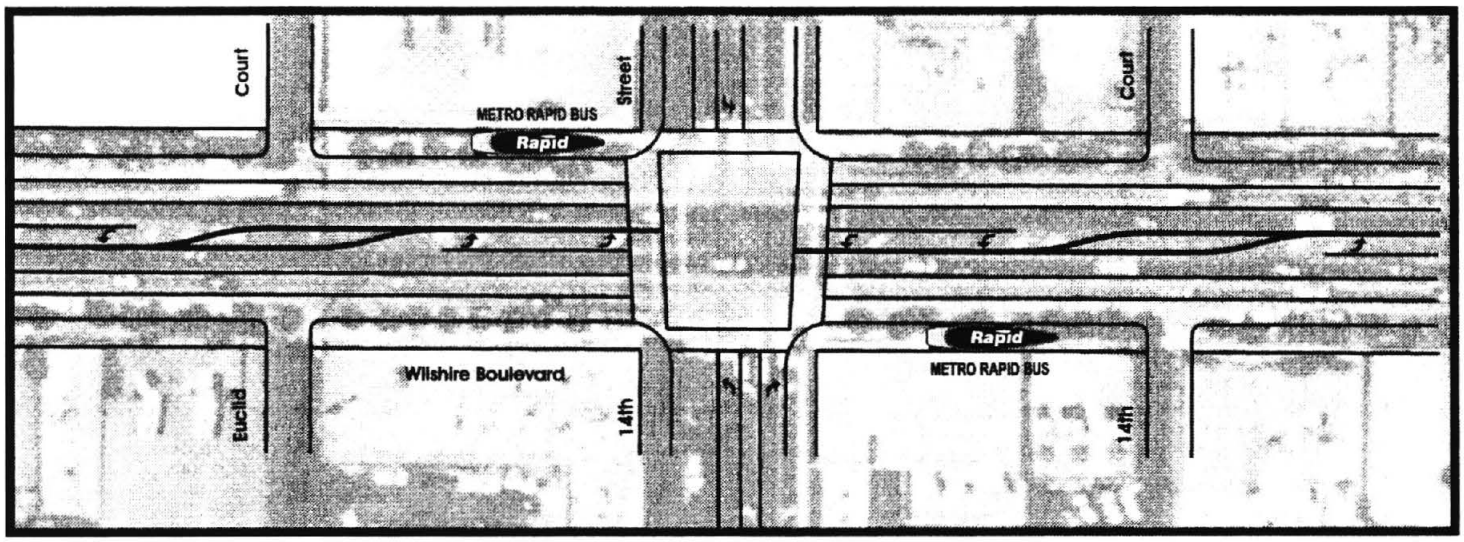
SOURCE: Korve Engineering, 2002

Mid-City/Westside Transit Corridor

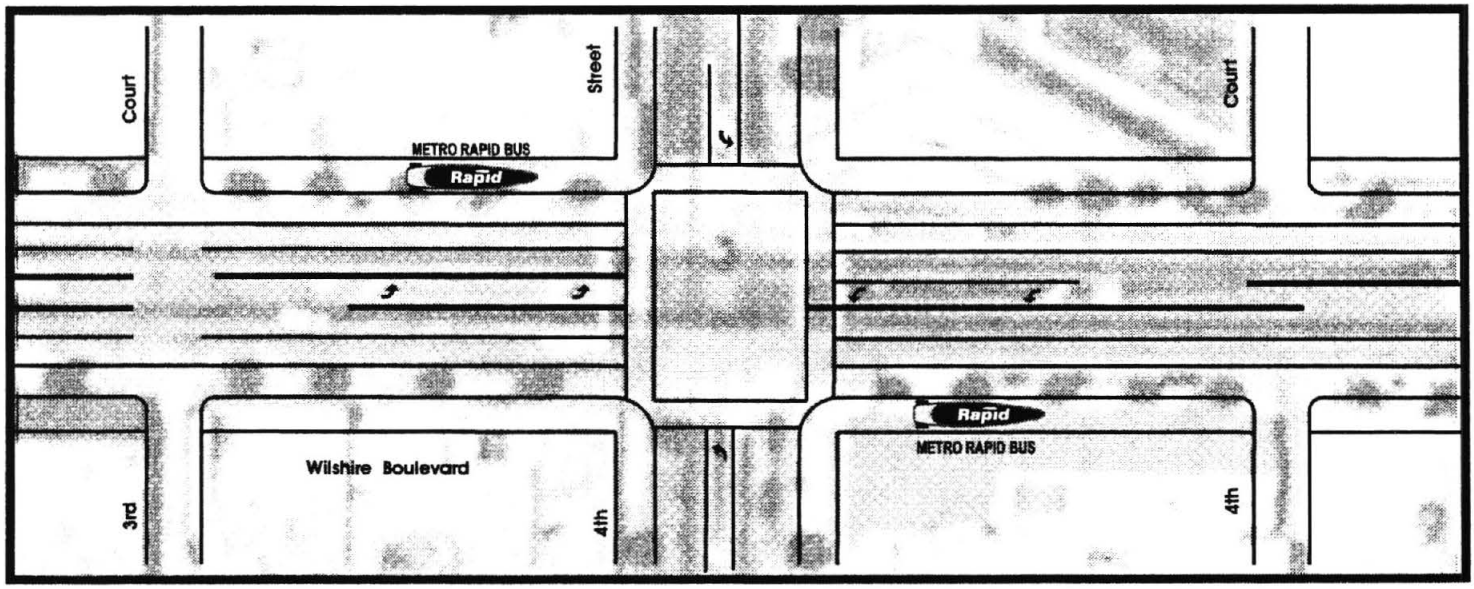
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FIGURE 2-14

BARRINGTON & BUNDY STATIONS



14th Station



4th Station

SOURCE: Korve Engineering, 2002

Mid-City/Westside Transit Corridor

LOS ANGELES COUNTY METROPOLITAN TRANSPORTATION AUTHORITY

FIGURE 2-15

14TH & 4TH STATIONS

2.4.4 BRT Parking Facilities

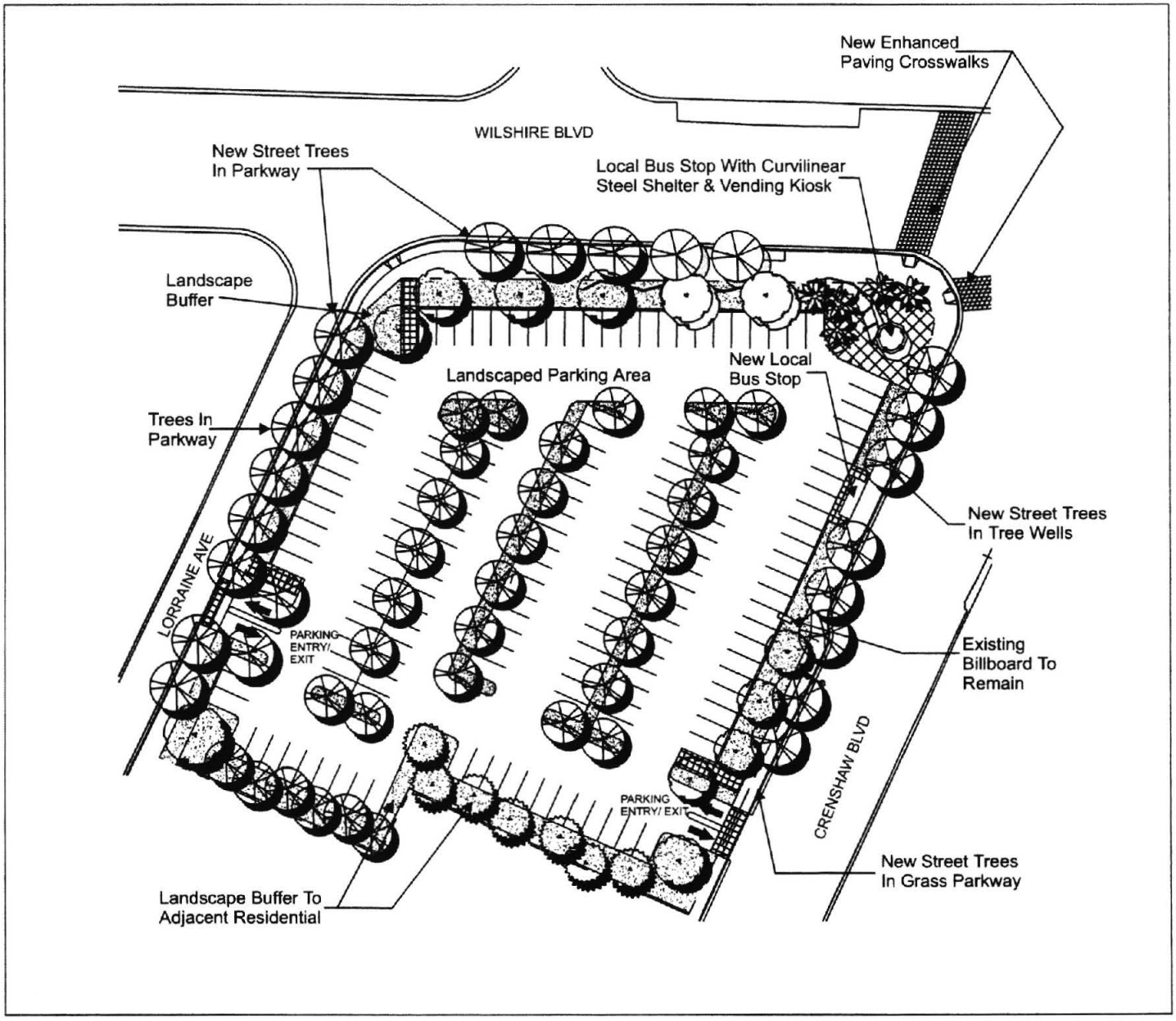
The MTA normally constructs park and ride lots as a part of new transit lines to encourage high ridership and provide a place for transit patrons to leave their cars when they board a bus or train. However, no parking lots have been explicitly provided for this purpose along the Wilshire BRT route: (1) because of the density of the Wilshire corridor and (2) because it the MTA's intent not to attract additional automobile trips into the corridor. However, the MTA owns two sites (one at the southwest corner of Wilshire and Crenshaw Boulevards, and the other at the northwest corner of Wilshire Boulevard and La Brea Avenue) that could be used. These parking facilities would provide parking for the Wilshire BRT project, as well as parking for those with existing lease agreements with the MTA.

The MTA-owned Wilshire/Crenshaw site is 1.62 acres. This site contains a surface parking lot with 135 parking spaces that are currently leased to the Los Angeles Unified School District (LAUSD), and a vacant lot. This site also surrounds a 0.17-acre residential parcel on three sides, which is currently privately owned and occupied as a single-family residence that would be acquired for the project.

The proposed layout for the future parking facility at Wilshire/Crenshaw is shown in Figure 2-16. The future parking facility would provide 167 spaces. Proposed for this site are enhanced paving in the crosswalks, landscaping with trees providing shade for 50 percent of the area at maturity, and a new local bus stop with a curvilinear steel shelter. The landscaping, as well as proposed setbacks, would be in compliance with regulations set forth in the Park Mile Specific Plan. Access would be provided via Lorraine Avenue and Crenshaw Boulevard. Parking at this site would be shared initially between an existing tenant (LAUSD) and future transit users.

The MTA-owned Wilshire/La Brea site is 1.23 acres. The western portion of the site contains a self-service parking lot with approximately 50 spaces, and a newsstand. An unstriped parking lot with approximately 36 to 40 spaces is north of this lot. The two lots provide parking to surrounding commercial and residential uses. The eastern portion of the site contains an existing building, with a Metro Customer Service Center and a consignment store. This building is not a part of the Wilshire BRT project, however upgrades may be undertaken as a part of MTA's Joint Development Program.

The proposed layout for the future facility at La Brea is shown in Figure 2-17. The future facility would involve the resurfacing and repaving of the two parking areas to provide a total of 74 parking spaces. The property would be brought into code compliance and landscaping would be added to the site. The MTA would maintain existing lease agreements; the newsstand owner/patrons use some spaces, while surrounding businesses and residences use other spaces. Additional spaces would be available for transit parking. Access would be provided via Detroit Street.

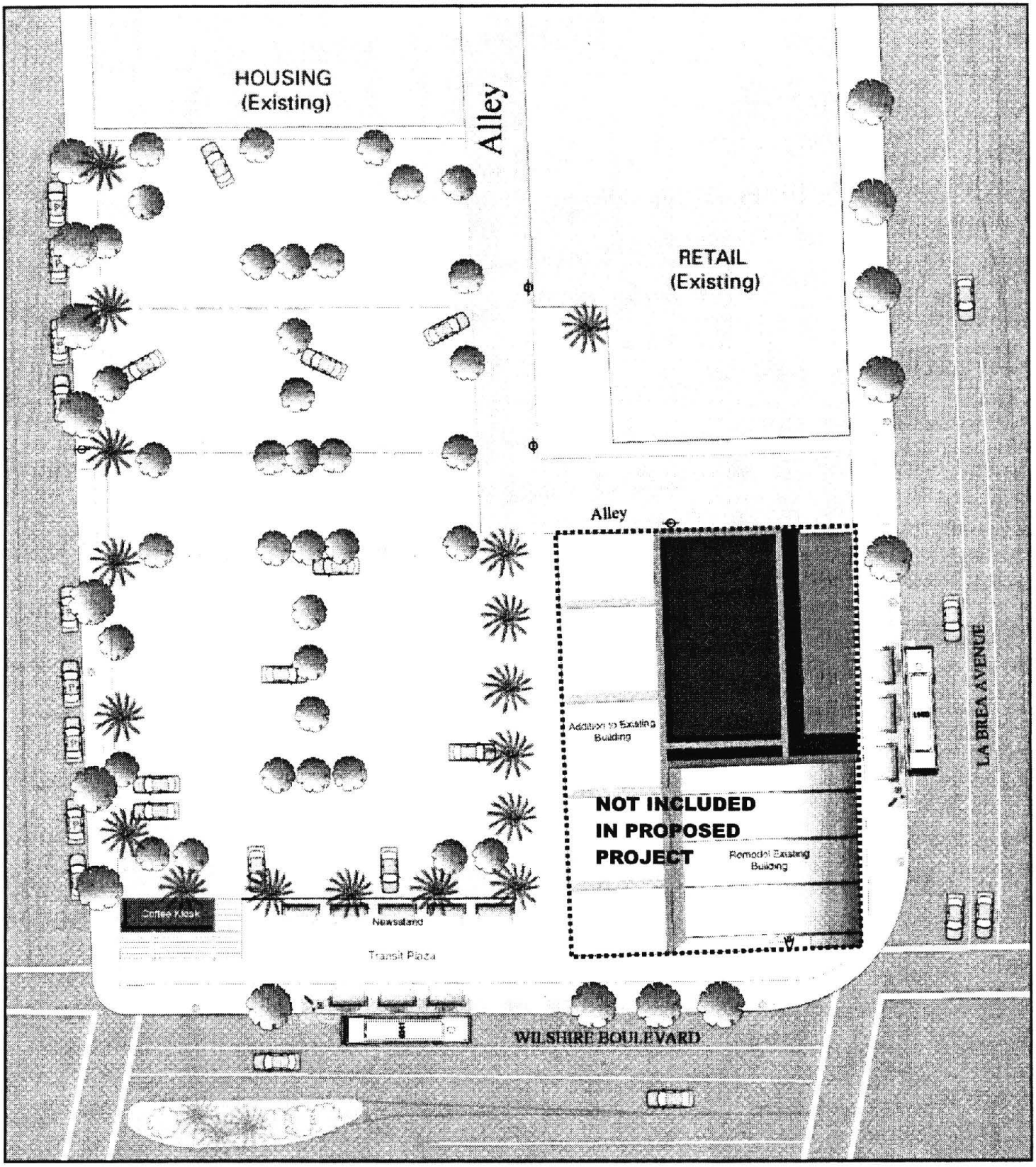


SOURCE: Melendrez Design Partners

Mid-City/Westside Transit Corridor

LOS ANGELES COUNTY METROPOLITAN TRANSPORTATION AUTHORITY

FIGURE 2-16
WILSHIRE/CRENSHAW
COMMUNITY PARKING FACILITY



APPROX. SCALE

N

0 25 50 FEET

SOURCE: Suisman Urban Design, 2002

Mid-City/Westside Transit Corridor

LOS ANGELES COUNTY METROPOLITAN TRANSPORTATION AUTHORITY

FIGURE 2-17

WILSHIRE/LA BREA
COMMUNITY PARKING FACILITY

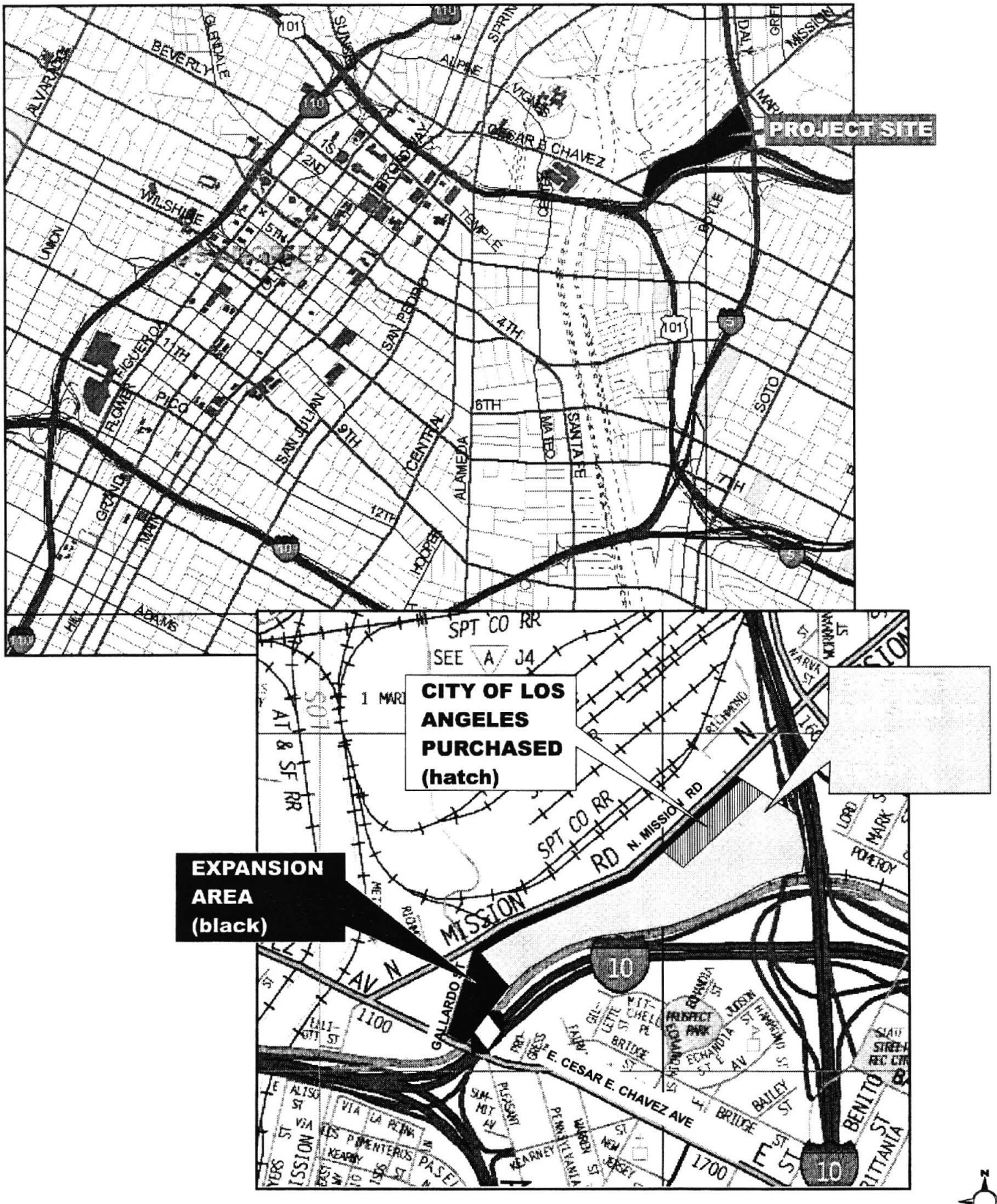
2.4.5 BRT Maintenance and Storage Facilities

The Wilshire BRT system will require a bus storage and maintenance facility. The facility would provide maintenance for the Wilshire BRT and Metro Rapid Bus systems, and as such would need to be located in a location central to both systems (i.e., in the downtown Los Angeles area). Following a review of potential sites in the Mid-City/Westside Transit Corridor Draft EIS/EIR (April 2001), a preferred site was recommended at the northeast corner of Washington/Alameda Street. In October 2001, however, the MTA Board directed that this site be deleted from further consideration.

The second highest recommended site in the Draft EIS/EIR was an expansion of the existing MTA Division 10, located at 742 North Mission Road in the City of Los Angeles (see Figure 2-18 and 2-19). The facility is approximately 20.2 acres in size and has been in operation since 1984. The proposed expansion is shown in Figures 2-20 and 2-21. The proposed expansion would add approximately 8.6 acres to the existing facility. The site would be expanded through the acquisition of parcels along the east side of Mission Road and by including a triangular-shaped area south of the Metrolink tracks, for a total of approximately 28.8 acres.

The expanded site would add 118 bus parking spaces, for a total of 352, and 317 employee parking spaces (for a total of 567—46 of the existing employee parking spaces would be removed). A two-level parking structure would be constructed on the site of the existing employee parking area to provide for bus storage.

Other elements of the proposed facility include: a new maintenance building, a new tire shop, a new transportation building, new fueling lanes/CNG farm, and a new fare retrieval area. A deck bridge would span the railroad tracks and provide access to the two parts of the proposed site. The existing tire shop would be relocated to an area near the San Bernardino Freeway structure.



SOURCE: Terry A. Hayes Associates LLC, 2002

Mid-City/Westside Transit Corridor

LOS ANGELES COUNTY METROPOLITAN TRANSPORTATION AUTHORITY

FIGURE 2-18
LOCATION OF PROPOSED
BUS MAINTENANCE FACILITY



Proposed Bus Maintenance Facility - Photograph shows existing Division 10 site with San Bernardino Freeway to the right and Mission Street to the left. Property between existing parking (right side of photograph), and Mission Street is to be added to Division 10.

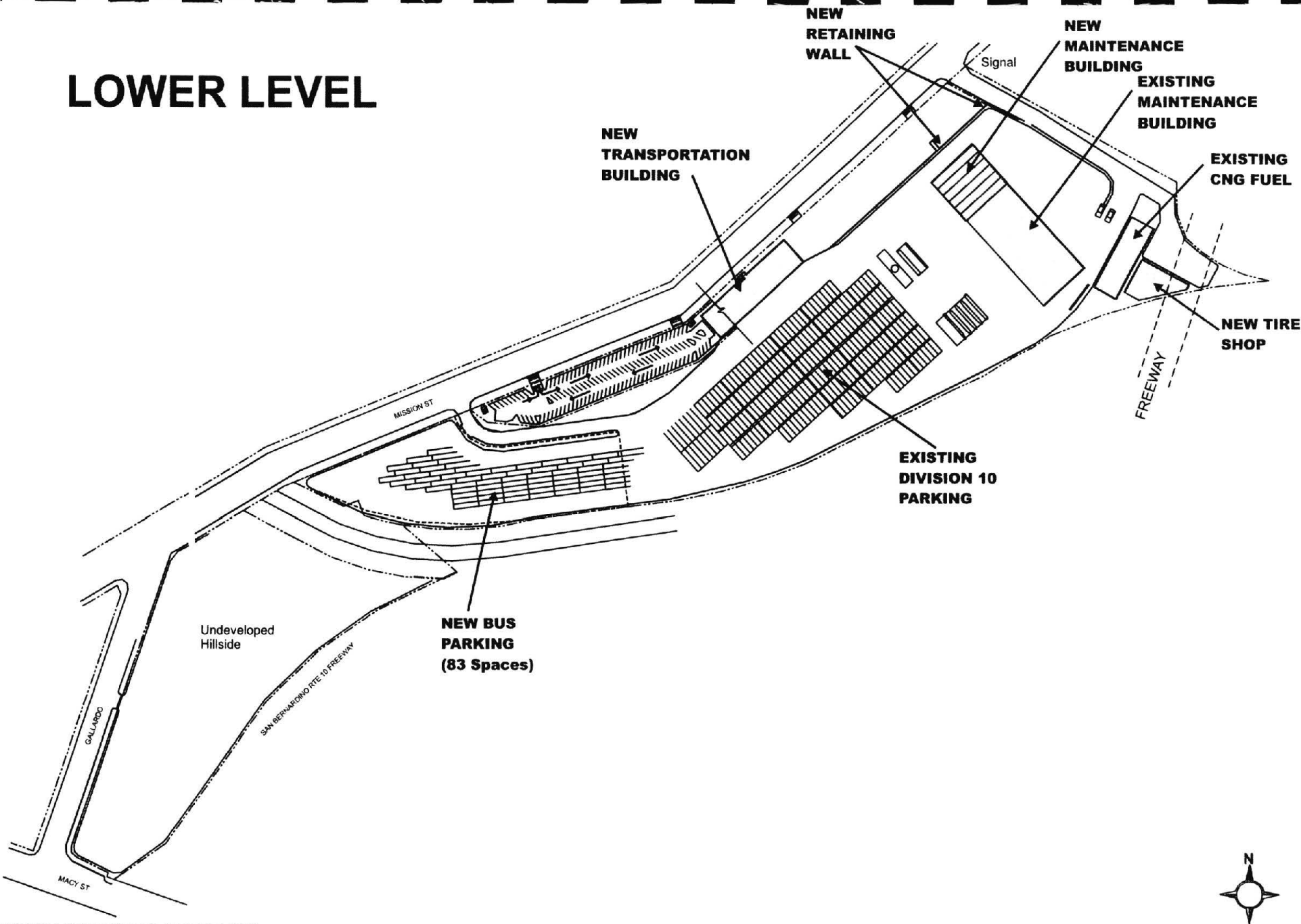
SOURCE: Los Angeles County Metropolitan Transportation Authority, 2002

Mid-City/Westside Transit Corridor

LOS ANGELES COUNTY METROPOLITAN TRANSPORTATION AUTHORITY

FIGURE 2-19
PHOTOGRAPH OF PROPOSED
BUS MAINTENANCE FACILITY SITE

LOWER LEVEL



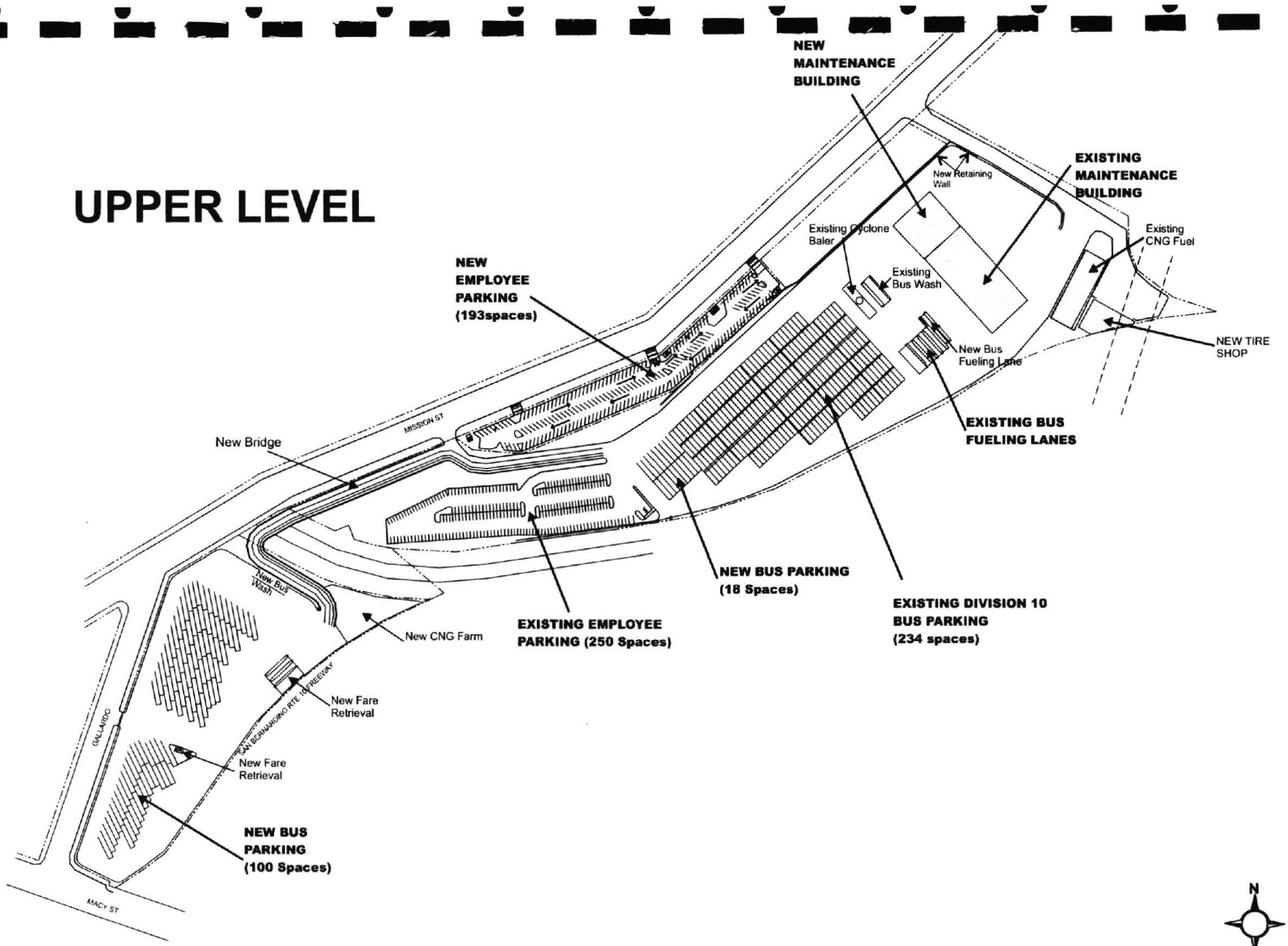
SOURCE: Richard Chong & Associates, 2002

Mid-City/Westside Transit Corridor

LOS ANGELES COUNTY METROPOLITAN TRANSPORTATION AUTHORITY

FIGURE 2-20

PROPOSED BUS MAINTENANCE FACILITY - LOWER LEVEL



SOURCE: Richard Chong & Associates, 2002

Mid-City/Westside Transit Corridor

LOS ANGELES COUNTY METROPOLITAN TRANSPORTATION AUTHORITY

FIGURE 2-21

PROPOSED BUS MAINTENANCE FACILITY - UPPER LEVEL

2.5 OTHER FINAL EIS/EIR ALTERNATIVES

As a basis for the comparison of impacts of the Wilshire BRT LPA, this Final EIS/EIR includes two alternatives, No Action and TSM, as described below.

2.5.1 No Action Alternative (Baseline)

■ Physical Characteristics

The No Action Alternative (Baseline) comprises the existing transit systems currently in use or expected to be in place in 2020. This includes the existing rail transit service with slightly improved frequencies on the Red, Blue, and Green Lines, as well as the approved Pasadena Blue Line.[2] Expansion of regular bus service is assumed based on MTA's commitments to future bus expansion. Metro Rapid Bus services on Wilshire and Whittier Boulevards and Ventura Boulevard are assumed to continue. New High Occupancy Vehicle (HOV) projects are included that can be reasonably completed by 2020. The components are the foundation upon which all other alternatives are based.

■ Operating Characteristics

Table 2-4 provides a summary of the operating characteristics of the No Action Alternative.

Table 2-4 No Action (Baseline) Operating Characteristics

Transit Service	In general, existing and committed bus and rail service is maintained and completed. Pasadena-LA Blue Line completed. Rapid bus routes on Wilshire and Ventura Blvd maintained. Bus fleet size is increased over existing levels to match MTA's commitments to future bus expansion. Parallel bus routes are rerouted onto new freeway HOVs as applicable. Buses are rerouted to feed new rail stations as applicable. The existing fare structure is retained, with inflationary growth.
Operations	Trains would run every 4 minutes in the peak period for the two branches of the Red Line from Union Station to Wilshire/Western and to North Hollywood. Peak period train frequency on Blue, Green and Pasadena lines set at 5 minutes. Off-peak service is set at 10 minutes for each of the two Red Line branches; and 12 minutes for the Blue, Green and Pasadena Lines. Bus service frequencies largely similar to existing schedules.
Maximum Speed	Wilshire BRT would operate at maximum speeds of 35 mph, per existing posted speed limits.
Average Speed	Metro Rapid bus generally operates at a 20 percent speed improvement over local/limited bus speeds (i.e., 16 mph rapid bus versus 13 mph local/limited bus in mid-Wilshire segment).
Signal Priority/ Preemption	Signal priority assumed for rapid bus.

Source: Manuel Padron Associates, 2001

[2] The Pasadena Blue Line is being designed and constructed by the Los Angeles to Pasadena Blue Line Construction Authority but will be operated by MTA when construction is completed in July 2003.

2.5.2 Transportation System Management (TSM) Alternative

Physical Characteristics

This alternative is based on the No Action description, with some bus service changes identified in MTA's Westside Bus Service Improvement Study completed in June 1998. Changes include the use of articulated buses, modifying service frequencies to more closely match demand on various routes; route extensions to connect to major destinations and/or transit hubs; route truncations to eliminate unproductive service segments or duplication; consolidation of service to simplify route structure and use; and replacement of unproductive routes. Slightly more frequent service is assumed for the portion of the Wilshire/Whittier rapid bus serving the Westside.[3]

Operating Characteristics

Table 2-5 provides a summary of the operating characteristics of the TSM Alternative.

Table 2-5 Transportation System Management (TSM) Operating Characteristics

Transit Service	Rapid bus on Wilshire slightly improved service levels in peak and midday (3 minute peak service in both directions, 6.6 minute base). Selected bus route changes incorporated per Westside Bus Service Improvement Study to improve service on more productive routes, modify service on less productive routes, and modify routings as appropriate to connect to major destinations and/or transit hubs.
Operations	Articulated buses at least 60 feet long are projected to be needed on the Wilshire/Whittier rapid bus line under this alternative. Rail operations identical to No Action.
Max Speed	Wilshire BRT would operate at maximum speeds of 35 mph, per existing posted speed limits.
Avg Speed	Same as No Action.
Signal Priority/ Preemption	Same as No Action.

Source: Manuel Padron Associates, 2001

2.6 CAPITAL COST ESTIMATE

Table 2-6 provides the estimated capital costs of the Wilshire BRT project in 2001 dollars and "Year of Expenditure" dollars. In order to account for inflation, the second figure provides the cost of the project in the year that the funds are spent, and therefore is a truer indicator of the costs to be incurred. The various elements of the project would be procured and constructed on different time schedules; however, all project elements are scheduled to be in service by November 2005.

[3] TSM measures such as regulatory measures (growth management, parking fees, etc.), non-motorized (bicycle and pedestrian improvements, or employer trip reduction programs (ridesharing, car pool matching, telecommuting, staggered hours, compressed work week, etc.) were not considered in this document because MTA does not have the regulatory authority to implement such measures. Authority rests with the South Coast Air Quality Monitoring District and these measures have largely been phased out of the Air Quality Management Plan.

Table 2-6 Wilshire Bus Rapid Transit Project Summary of Costs		
Project Elements	*2001 Dollars (millions)*	*Year of Expenditure Dollars (millions)*
Vehicles	$ 75.80	$ 82.30
Stations and Systems	$ 8.70	$ 9.40
Curb Lane Repair & Reconstruction	$ 6.10	$ 6.50
Maintenance Facility	$ 27.90	$ 29.20
Right-of-Way	$ 25.00	$26.10
Special Conditions [a]	$14.80	$15.70
Subtotal	*$ 158.30*	*$ 169.20*
Professional Services [b]	$ 20.50	$ 21.60
Project Contingency	$ 38.60	$41.40
Subtotal	*$ 59.10*	*$ 63.00*
Total Project Cost	**$ 217.40**	**$ 232.20**

Unescalated BRT vehicle cost assumes 97 vehicles at $710,000 each plus $71,000 each for spare parts = $75.8 million.

a. Special conditions include utility relocation, environmental hazardous soil treatment, master cooperative agreements, insurance, testing, Art for Transit Program, traffic signal priority, neighborhood and environmental mitigation.

b. Professional services include engineering, construction management, agency, and specialty consultants.

Source: MTA, 2002

2.7 RIDERSHIP FORECASTS

Project ridership under several different operating scenarios is shown below. In Table 2-7, a comparison is provided between Year 2020 forecasts for both the TSM and the Wilshire BRT Final EIR Alternatives. The TSM Alternative provides modest enhancements to the existing Metro Rapid Bus Service, without the additional features of Bus Rapid Transit that are included in the proposed project. The forecast indicates that the Wilshire BRT project would add approximately 6,200 new daily transit trips to the countywide system, as compared to 1,100 trips that would be added if only the TSM project were implemented. Using relatively conservative assumptions, this model forecasted a total of 45,500 daily boardings in the project area for the Metro Rapid Bus with BRT enhancements.

Table 2-8 provides a comparison of daily boardings compared with existing Metro Rapid Bus Boardings, assuming alternative operating plans with peak service frequencies between two to three minutes. The Full Route describes total boardings over the full 26 miles of the Metro Rapid Bus Line #720 between Santa Monica and Montebello. The "Project Area" boardings describe the total boardings in the project area between Santa Monica and Wilshire/Western. Existing passenger counts taken in 2001 indicated that Metro Rapid Bus has a current total of 40,300 boardings per day over the full route, and 17,100 boardings per day in the project area. These amounts are modeled to increase by 141 percent if the TSM Alternative is implemented in 2020 and between 180 percent and 211 percent if the full Wilshire BRT set of enhancements are implemented. A total of up to 53,100 boardings per day could be achieved in the project area and 88,000 boardings per day could be achieved over the full route to Montebello.

Table 2-7 Ridership in Forecast Year 2020

Alternative	Daily Fixed Guideway Boardings [1,2]	Incremental Linked Trips (Daily)[2]	
		To No Action	To TSM
TSM	N/A	1,100	N/A
Wilshire BRT	45,500	6,200	5,100

1. Boardings for segment in project area only, from Western Avenue to downtown Santa Monica (does not include entire rapid bus route).
2. Adjusted from Draft EIS/EIR to reflect BRT in peak period only.

Table 2-8 Comparison of Daily Boardings (Route 720)

Alternative	Daily Boardings		Percent Change from 2001	Percent Change from Updated TSM
	Full Route	Project Area		
Existing Passenger Counts (2001)	40,300	17,100	N/A	N/A
2020 TSM with 2001 Operating Plan	67,500	41,200	141%	N/A
2020 Wilshire BRT with 2001 Operating Plan	79,400	47,800	180%	16%
2020 Wilshire BRT with Alternative Operating Plan	88,000	53,100	211%	29%

Full route boardings include all route patterns from downtown Santa Monica to Montebello (26 miles).
Project area boardings include all route patterns from Western Avenue to downtown Santa Monica (13 miles).
MTA passenger count data from summer 2001.

2.8 BENEFITS: IMPROVEMENTS IN BUS TRANSIT SPEEDS AND REDUCTIONS IN TRAVEL TIME

Before the implementation of Metro Rapid in June 2000, MTA Bus Lines 18, 20, 21, 22, and 320 served the Wilshire Boulevard route. The peak period average speed of this service was approximately 12 miles per hour, which is very similar to the current running speeds of the BRT system in Curitiba, Brazil. At that time, the average travel time to complete the journey from Wilshire/Western to the Santa Monica Pier was approximately 65 to 69 minutes.

Today, the Metro Rapid has an average peak period speed of approximately 16 miles per hour, an increase of approximately 25 percent. This improvement has come about primarily through the reduction in the total number of stations and the implementation of traffic signal priority in the City of Los Angeles segments of the corridor. Peak period average travel times from Wilshire/Western to Santa Monica Pier are approximately 50 to 55 minutes, a reduction of between 10 and 19 minutes per trip.

The BRT enhancements included in the Locally Preferred Alternative would build upon the current Metro Rapid successes with the implementation of several additional features. These have been analyzed using existing and projected data to see how each individual component is effective in reducing the travel times within the corridor. Figure 2-22 shows that the Wilshire BRT would achieve a ten- to twelve-minute, or approximately 21 to 27

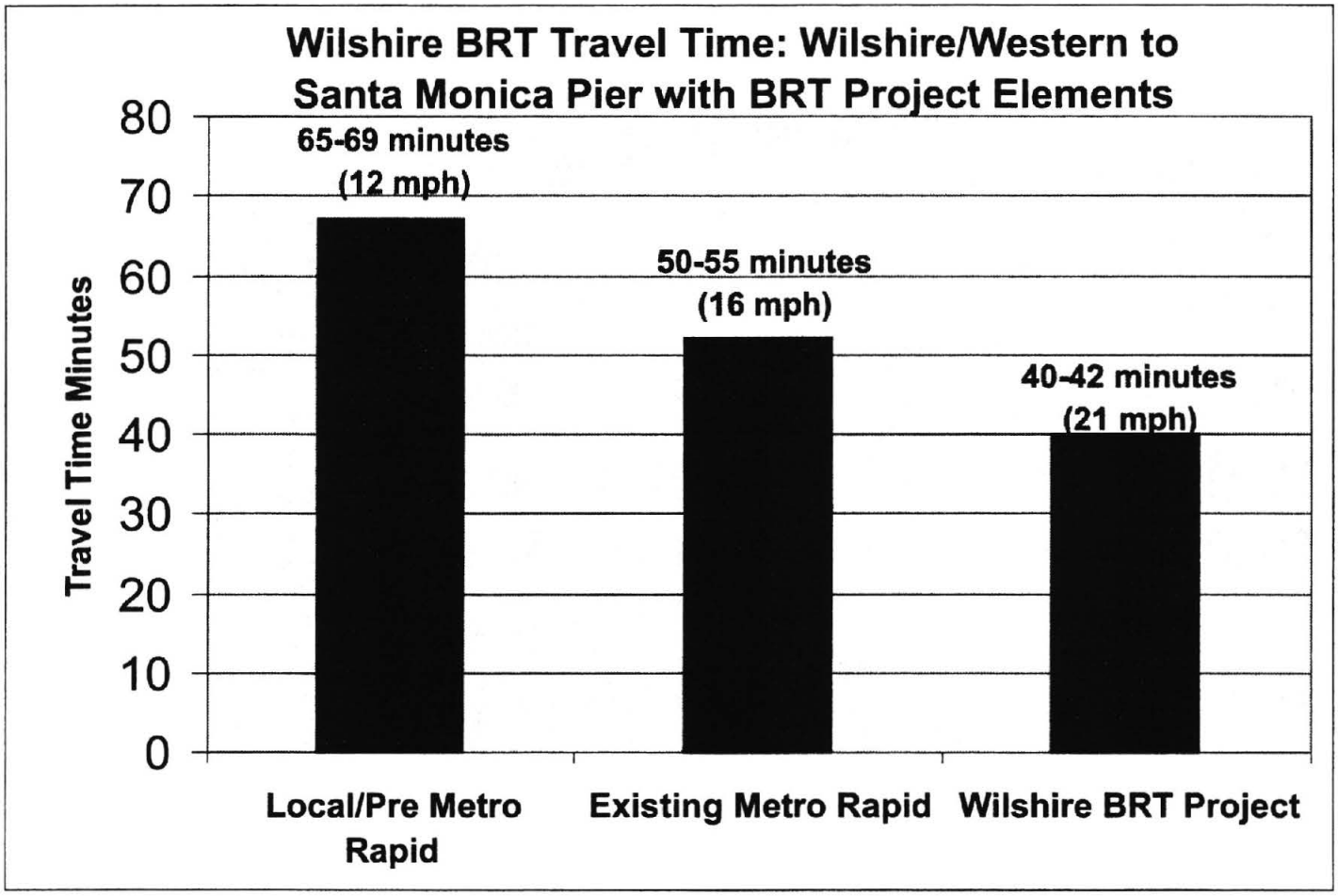


FIGURE 2-22
WILSHIRE BRT TRAVEL TIME: WILSHIRE/WESTERN TO SANTA MONICA PIER WITH BRT PROJECT ELEMENTS

percent, overall decrease in travel time from the existing Metro Rapid service. This is due to a combination of the project components including the following:

BRT Vehicle & Station Enhancements. Three-door buses, multiple-door boarding, lighting, and improved "smart card" fare collection systems reduce the time that the bus is stopped at the stations. At several of the highly patronized stations, this will greatly reduce the waiting time that riders presently experience as each rider must board and pay at the farebox located only at the front of the bus. Multiple doors and fare pre-payment would allow riders to board and alight at any of the three-doors, similar to a rail car. This reduces the amount of time the bus is stopped at the station and is the single, most-effective strategy to improve existing bus speeds in the corridor. Approximately two thirds of the increase in travel speeds would be attributable to such BRT vehicle and station enhancements.

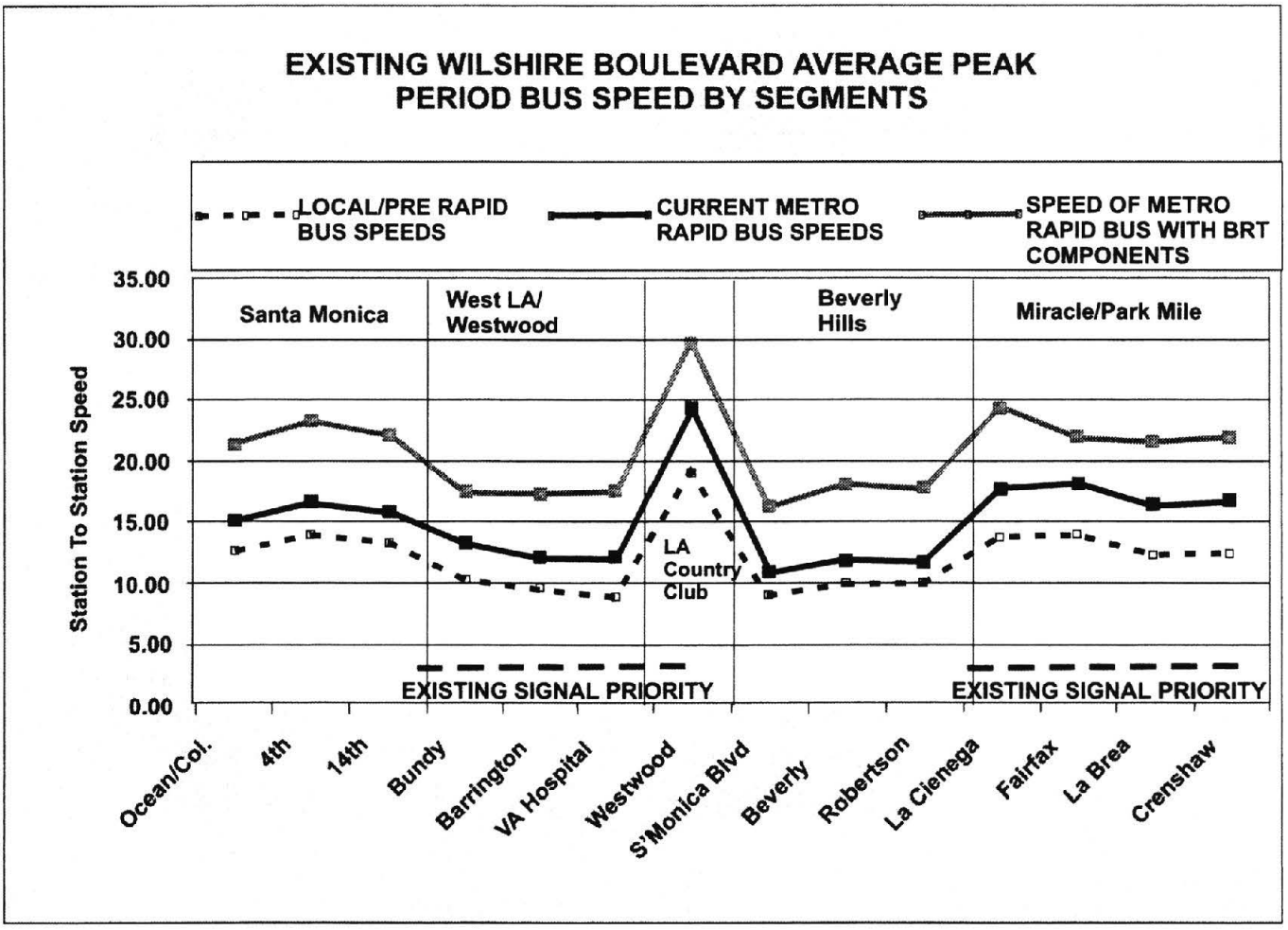
The most noticeable improvements would be at Wilshire/Western, Wilshire/La Brea, Wilshire/Westwood, and Ocean/Colorado stations, where bus dwell times would be reduced by more than 50 percent. An average trip from Wilshire/Western to the Santa Monica Pier would be reduced by between 6 and 11 minutes.

Expanded Traffic Signal Priority. The current bus signal priority system has only been implemented in the City of Los Angeles to date. Expansion of signal priority into the Cities of Beverly Hills, Santa Monica, and the County of Los Angeles (VA Hospital Property) would provide the next most cost-effective strategy to improve bus speeds in the corridor. Approximately 18 percent of the reduction in travel time would result from the expansion of Traffic Signal Priority throughout the remainder of the corridor.

Previous studies undertaken by the MTA and LADOT have determined that traffic signal priority accounts for between 7 to 15 percent of increases in bus speeds. If such decreases in travel time were applied to the segments of Beverly Hills and Santa Monica where no such priority presently exists, the average daily run times would decrease approximately three to four percent over existing Metro Rapid service. This very low cost component would reduce peak run times by about one to three minutes, to 42 to 43 minutes for a typical peak-hour trip between Wilshire/Western and the Santa Monica Pier.

Peak Period Dedicated Bus Lanes. The third component, Peak-Period Dedicated Bus Lanes, is proposed to be implemented in segments, only with the approval of the local jurisdictions. If implemented throughout the route, the peak-period, dedicated bus lane would contribute approximately 18 percent to the total travel time reduction. This would reduce peak run times by an additional two to four minutes, or between 40 to 42 minutes for a typical trip between Wilshire/Western and the Santa Monica Pier during periods of heavy traffic congestion when bus travel times are allowed. The implementation of a peak hour lane provides and added benefit over time, of ensuring that bus run time stays consistent, even as general traffic speeds continue to decline in the future.

Figure 2-23 shows that by combining the proposed BRT Components, average bus speeds would increase from approximately 16 miles per hour on current Metro Rapid Service to approximately 21 miles per hour. Most areas would be expected to show significant improvements in bus speeds particularly in Beverly Hills and Westwood.



SOURCE: Suisman Urban Design, 2000

FIGURE 2-23
EXISTING WILSHIRE BOULEVARD AVERAGE PEAK PERIOD BUS SPEED BY SEGMENTS

However, bus speeds vary greatly across the corridor. This is due to the varying capacity of the boulevard and the street geometrics. Los Angeles is a series of grid networks and in Beverly Hills and Santa Monica that grid is turned on an axis. In Beverly Hills, for example three major boulevards terminate in the Beverly Hills Business Triangle causing a "junction like effect." In Westwood, the street network experiences great traffic congestion due to conflicts between Westwood Boulevard, Sepulveda Boulevard and the I-405 freeway. Not surprisingly, Beverly Hills and the Westwood/I-405 junction have the slowest travel speeds in the corridor. The area between the city of Beverly Hills, the Los Angeles Country Club and Westwood Boulevard, commonly referred to as 'Condo Canyon,' have the fastest travel times of any segment along the corridor.

For a relatively low cost, the travel time of the corridor could be reduced to approximately 40 to 42 minutes the peak period, a substantial reduction from the Pre-Metro Rapid time of 65 to 69 minutes.

2.9 PROJECT IMPLEMENTATION APPROACH

As indicated previously, the MTA Board approval of the Wilshire BRT LPA specifically stated that project implementation would be subject to local jurisdiction approval. While selection of the peak-hour curb lane option would substantially reduce or eliminate key community concerns related to loss of landscaped medians, on-street parking and left-turn movements, other key concerns remain: particularly, the effect on corridor-wide traffic flow due to diverted vehicular traffic currently using the peak-hour curb lane. Additionally, some on-street metered parking in West Los Angeles is currently allowed in the peak periods and would be impacted by a dedicated transit lane during those times. To assess the impact of the LPA, the MTA has identified a demonstration program to test the peak-period lane in selected segments of Wilshire Boulevard, if approved by local jurisdictions. The demonstration program would test the operation initially, of an AM peak period lane (7:00 A.M.–9:00 A.M.) during the time when most retail businesses are not yet open. Traffic counts would be taken to measure traffic diversion to parallel streets. Also, demand for parking would be evaluated during the demonstration to determine if permanent implementation should proceed.

It is important to note that each city will have jurisdiction over this activity. For example, in the past, the Los Angeles City Council has removed a traffic lane in the Miracle Mile area to install on-street metered parking spaces in the curb-lane during non-peak periods. This lane closure has not unduly impacted adjacent neighborhoods or traffic arteries and is generally well supported by the community. Similar decisions regarding the hours of operation and restrictions placed on curb-lane use are within the authority of each city along the route. MTA will continue to work with each city to advocate consideration and implementation of the curb lane transit priority in peak periods; however, actual implementation of dedicated lanes would be the responsibility of the city to approve.

To address specific jurisdiction-by-jurisdiction concerns, the MTA is planning to implement the project via seven construction "packages," as follows:

- Curb Lane Repair and Reconstruction, Stations and Signals within City of Los Angeles
- New Stations in Beverly Hills
- New Stations in Santa Monica

- New Station at VA Hospital
- Demonstration Program for each transit lane
- Bus Storage and Maintenance Facility in Downtown Los Angeles
- Parking Facilities (at Crenshaw and La Brea MTA-owned sites)

Wilshire Boulevard Curb Lane Repair and Reconstruction in the City of Los Angeles

The majority of the construction activities (lane repair/reconstruction and installation of concrete bus pads) would occur along a four-mile segment of Wilshire Boulevard, between Western Avenue and San Vicente Boulevard. Lane reconstruction would not occur from San Vicente Boulevard to Ocean Avenue (West Los Angeles and Santa Monica) since the curb lane is in good repair in these areas. Bus pad reconstruction is proposed in West Los Angeles between Westwood Station and Bundy Station, to provide for enlarged transit vehicles. Bus Pads in Beverly Hills and Santa Monica are already in place to support such vehicles. Stations would be installed along the entire length of the project at fifteen station sites (two shelters per station—one eastbound and one westbound for a total of 30 bus shelters). These will expand upon existing Metro Rapid Shelters in the City of Los Angeles. In the cities of Beverly Hills, Santa Monica, and the County of Los Angeles (VA Hospital Station) where shelters do not presently exist, new shelters would be implemented under agreements to be developed with each city. Ownership of the stations would reside with each city, as is presently the case, however funds identified for the Wilshire BRT project would be made available for the fabrication and erection of the shelters by the MTA. Maintenance and upkeep of the stations is customarily a contracted service that is funded through advertising revenues generated on the kiosk and other locations at each shelter.

The intent of the curb lane reconstruction between Western Avenue and San Vicente Boulevard is to provide a level travel surface for the buses, and in turn a more comfortable ride for bus passengers. The area to be reconstructed would be at the intersections and at mid-blocks between the intersections. Reconstruction of the curb lane would employ conventional construction methods, techniques, and equipment. All construction work for development of the transit system would conform to accepted industry specifications and standards.

Construction would consist of the following components:

- Reconstruction of travel lanes and bus pads on Wilshire Boulevard (between Western Avenue and San Vicente Boulevard)
- Installation of bus pads only at station locations from Westwood Boulevard to Bundy Drive
- Installation of station shelters and station landscaping along the entire Wilshire BRT route (from Western Boulevard to Ocean Avenue)
- Installation of additional infrastructure for elements such as communications and signaling

Construction of the curb lane improvements between Western and San Vicente is expected to occur in three phases. Under each phase, different groups of three to four street block segments would be affected. Each phase would typically last approximately 16 weeks, for a total construction period of approximately 48 weeks. Construction within each block segment consists of intersection and mid-block reconstruction. Within each block segment, construction would generally follow a sequence of steps or stages where different portions of the street

would be affected such that traffic, parking, and sidewalks can be maintained in other areas during construction. Upon completion of a stage, traffic circulation patterns would be shifted so that construction for the next stage can begin. Reconstruction of intersections would occur first. Once reconstruction of the intersections is completed, reconstruction of travel lanes in mid-blocks would occur. Mid-block construction would occur on the north side of Wilshire Boulevard, followed by the south side. During reconstruction of travel lanes, at least one travel lane, in the direction with construction activities, would be open on Wilshire Boulevard. All travel lanes going the opposite direction, where no construction activities are occurring, would be open.

Reconstruction of travel lanes would consist of

- Removal of existing pavement
- Excavation
- Relocation of utilities
- Building curbs and gutters
- Construction of bus pads (approximately eight-inch concrete pads) at station locations
- Asphalt/concrete (AC) paving
- Laying final paving course
- Reinstallation of signal conduits
- Cutting signal loops
- Pavement markings and signing

The Wilshire Boulevard BRT Construction Impacts and Mitigation are described in Section 3.8.

Station Installation

During roadway reconstruction, 30 curbside shelters would be installed (one eastbound and one westbound shelter at 15 different intersections). These stations would be constructed using the same design as the existing Metro Rapid shelters from standard building materials, such as brick, concrete, steel, and heavy plastic, which are durable and resistant to vandalism. The stations for the BRT system would be approximately 60 feet long and 6–10 feet wide.

Stations and Signals in Beverly Hills and Santa Monica

Separate discussion will be held with the cities of Beverly Hills and Santa Monica to reach agreement on the introduction of traffic signal priority and BRT stations; and, peak-hour curb lanes where appropriate. Implementation of any of these project elements would only occur following council approval in these two cities.

Station at VA Hospital

The Metro Rapid system is currently serving the Veteran's Administration (VA) Hospital via the existing Metro Rapid bus pullout at Bonsall Drive. As part of the Wilshire BRT Project, this stop would be upgraded to full BRT

standards to accommodate articulated buses. Separate discussions will be held with the County of Los Angeles and the Veteran's Administration regarding upgrades to the VA Hospital station.

■ Bus Storage and Maintenance Facility

As discussed in Section 2.4.5, the Wilshire BRT system will require a bus storage and maintenance facility. This design package of the implementation approach for the Wilshire BRT Project will constitute a separate construction package.

■ Parking Facilities

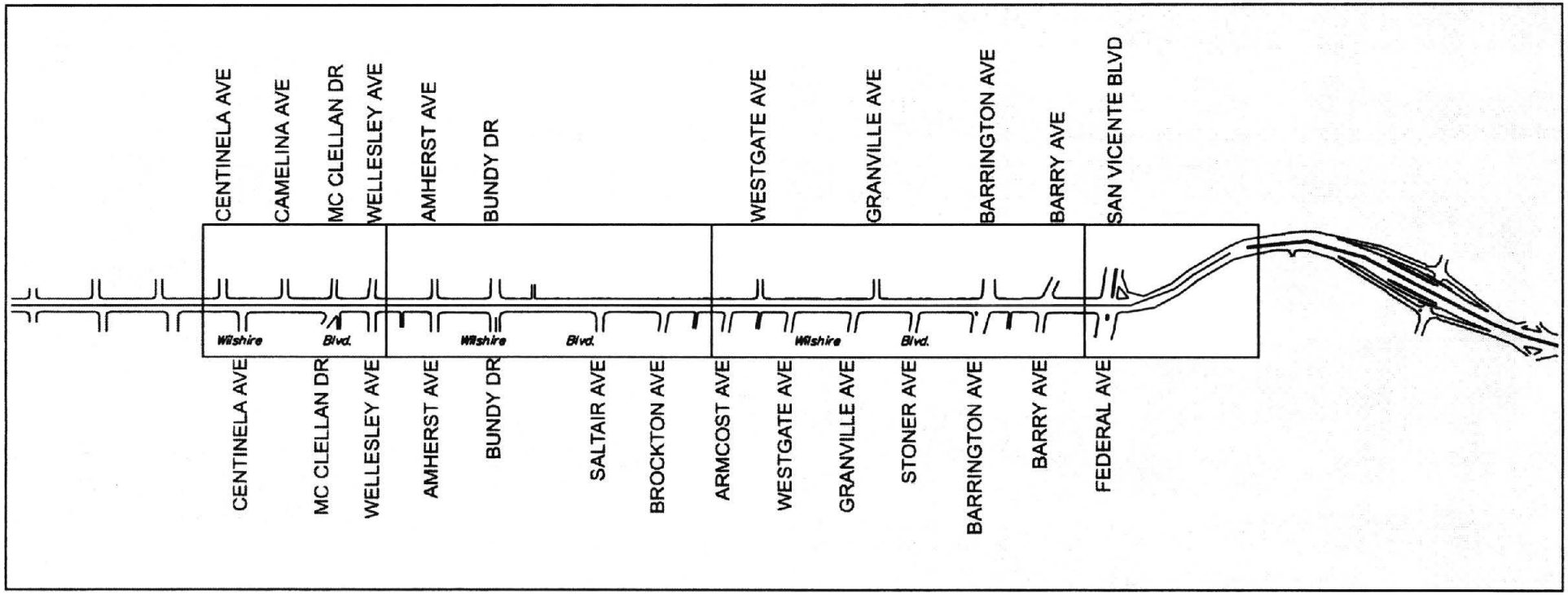
As indicated in Section 2.4.4, two parking facilities would be upgraded as part of the Wilshire BRT project. The final implementation package(s) would therefore entail the construction of these two sites. It should be noted that these sites were acquired as part of the subway program. The proposed upgrades to these two sites should therefore be viewed as interim uses, since the MTA may reconsider extension of the subway at some time in the future.

■ Wilshire BRT Peak Period Bus Lane Demonstration Program

If approved by the City of Los Angeles, a Demonstration Program has been proposed. The first proposed test area, called Demonstration Project 1, would implement the curb adjacent BRT lane along Wilshire Boulevard from Centinela Avenue in the west to the Federal Avenue/San Vicente Boulevard intersection in the east (Figure 2-24). This segment is entirely within the City of Los Angeles. Typical signs to be used for this project are shown in Figures 2-6 and 2-7. The lane would operate in the A.M. peak period only (7:00 A.M. to 9:00 A.M.), Monday through Friday. The length of the demonstration segment is approximately one mile. The segment includes seven signalized intersections and two MTA Metro Rapid Bus stops. It is envisioned that Demonstration Project 1 would be implemented for between 90–180 days in order to complete a comprehensive "before-and-after" study of the actual traffic and parking effects. Specifications of Demonstration Project 1 area as follows:

- Exclusive curb lane BRT operations 7:00 A.M. to 9:00 A.M., Monday through Friday
- Bus lane striping will follow LADOT standards, i.e., eight-inch white solid line with "Bus Only" pavement markings. A modified R86 sign "Right Lane—Buses and Right Turns Only, 7:00 A.M. to 9:00 A.M., Monday through Friday" is proposed
- No additional changes to existing signing or striping as well as parking restrictions are proposed
- BRT bus stops would be located at their existing locations on the far side of signalized intersections
- At all intersections, right-turning vehicles will be allowed to enter the BRT lane, converting the BRT lane into a shared lane in the vicinity of the intersection

The operation of the traffic signal system will not be changed. The signal timing will remain the same as will the operation of the Los Angeles Department of Transportation's (LADOT) transit signal priority (TSP) system. An exception may be the addition of a right turn phase at the signalized intersection of Wilshire Boulevard and Bundy Drive.



SOURCE: Korve Engineering

Mid-City/Westside Transit Corridor

LOS ANGELES COUNTY METROPOLITAN TRANSPORTATION AUTHORITY

FIGURE 2-24

WILSHIRE BRT DEMONSTRATION NO.1

As part of Demonstration Project 1, a "before-and-after" study would be conducted. It is envisioned that based on the data collected an evaluation report will be prepared that will discuss the following regarding the effectiveness and impacts of the curb-adjacent BRT lane:

- Bus speed
- Bus travel time and delay
- Loss of parking
- Diversion of traffic to alternate routes
- Effects on speed and delay in mixed flow lanes
- Impacts on right-turning vehicles and pedestrians on BRT delay
- Effectiveness of right-turn arrows
- Intersection Level of Service (LOS)

As part of a phased implementation process for the Wilshire BRT, it is envisioned that other demonstration projects will be conducted and evaluated within each of the affected jurisdictions along the Wilshire BRT route.

The MTA's goal is to implement BRT service, via peak-hour exclusive lanes, from Western Avenue to Centinela. Such upgraded service would be a seamless part of the Wilshire-Whittier Metro Rapid service. However, only by success of the Demonstration Program and local concurrence will the full project be implemented.

3.0 ENVIRONMENTAL ANALYSIS

3.1 INTRODUCTION TO THE ENVIRONMENTAL ANALYSIS

3.1.1 Introduction

Section 3.0 of this document examines the environmental consequences associated with the Proposed Project and its alternatives, as described in Section 2.0.

3.1.2 Contents of Environmental Analysis

Section 3.0 includes an analysis of the seven environmental issue areas listed below:

- 3.2 Traffic and Circulation
- 3.3 Parking
- 3.4 Land Acquisition/Displacement and Relocation
- 3.5 Visual Quality
- 3.6 Geology, Soils, and Seismicity
- 3.7 Safety and Security
- 3.8 Construction Impacts

Within each issue area, the Wilshire BRT, No Action, and TSM Alternatives are discussed in the following order:

- Introduction
- Affected Environment
- Impact Assessment and Mitigation Measures

3.1.3 Assessment Methodology

■ Affected Environment

In Section 3.0, the analysis within each issue area begins with an examination of the existing physical environment or baseline setting wherein the Proposed Project would be placed. For the purpose of this document, and pursuant to CEQA Guidelines, the affected environment used for this impact analysis reflects the actual conditions at the time or preparation of this document.

■ Impact Assessment and Mitigation Measures

Impact assessment methodology for each issue area includes a number of quantitative and qualitative methods currently used in similar environmental assessment documents, and specifically unique to evaluation of each specific issue. In developing an approach to the analysis of impacts and mitigation measures, the following were taken into consideration:

- CEQA regulatory requirements
- Other similar MTA documents for transit projects
- Federal and State air quality regulations
- Regional and local standards and policies

Using the above, thresholds of significance were developed for each issue area to determine the level of severity of project-related impacts. Impacts found to be significant and unavoidable, or mitigable to a less-than-significant level were identified. The same methodology was then applied systematically to each project alternative.

Each issue area evaluated the alternatives listed below in the following order:

- No Action Alternative (Baseline)
- Transportation System Management (TSM) Alternative
- Locally Preferred Alternative: Wilshire BRT

Once an impact was identified, feasible mitigation measures were developed that would reduce impacts to less-than-significant levels. There may be impacts that cannot be fully mitigated to less-than-significant levels. These impacts are referred to as significant and unavoidable impacts in each issue area. The cumulative impacts assessment is presented in Section 4.2 (Long-Term Implications).

Significance Categories

While the criteria for determining significant impacts are unique to each issue area, the classification of the impacts was uniformly applied in accordance with the following definitions:

- *Less-Than-Significant-Impact (LS)*: Results in no substantial adverse change to existing environmental conditions
- *Less-Than-Significant-After-Mitigation-Impact (LSM)*: Results in an impact which can be mitigated to less than significant with implementation of mitigation measures
- *Significant Impact (S)*: Constitutes a substantial adverse change to existing environmental conditions that cannot be fully mitigated by using all feasible mitigation measures or by the selection of a project alternative
- *Beneficial Impact (B)*: Results in a positive change to environmental conditions. This classification is not strictly required by CEQA; however, it expands to the range of public disclosure in this document

Cumulative Context

"Cumulative impacts" refer to two or more individual effects which, when considered together, are considerable or which compound or increase other environmental impacts. The individual effects may be changes resulting from a single project or a number of separate projects. The cumulative impact is the change in the environment due to the incremental impact of the project when added to other closely related past, present, and reasonably foreseeable future projects. Cumulative impacts can result from individually minor but collectively significant projects taking place over time.

The discussion of cumulative impacts must reflect the severity of the impacts, as well as the likelihood of their occurrence; however, the discussion need not be as detailed as that of environmental impacts attributable to the project alone. Further, the discussion is to be guided by the standards of practicality and reasonability.

The cumulative context for this analysis is based on the Southern California Association of Government's (SCAG) 1998 Regional Transportation Plan (RTP), entitled "Community Link 21." This document is a regional planning document that establishes the goals, objectives, and policies for the region's transportation system and establishes an implementation plan for transportation investments through the year 2020. The Mid-City/Westside Study Area extends through two of the 13 Subregions in SCAG's planning area, including the City of Los Angeles and the Westside Cities Subregion. The RTP reflects transportation, population, employment, and land use data for the five-county SCAG area through the year 2020, and is, thus, an appropriate basis for the analysis of cumulative impacts. Therefore, the cumulative condition is not limited to a list of related projects but is, instead, based upon a summary of projections contained in an adopted planning document (in this case, the SCAG Regional Transportation Plan).

Cumulative impacts are evaluated in each of the technical issue sections (in Sections 3.2 through 3.8 of this document). The cumulative analysis considers the impacts that could occur as a result of implementation of a proposed alternative together with other projects causing related impacts.

3.1.4 Analysis of Project Elements

The Wilshire BRT project includes a series of components: vehicles, stations, street repair/reconstruction, parking facilities, and a bus maintenance facility. However, not every component is subject to the regulations of CEQA. Buses and stations are routinely operated on city streets without environmental review.

Although environmental clearance is not required for these two components (vehicles and stations), there are some "effects" of these elements that are particularly noteworthy. The new vehicles and the new stations both have the potential to result in numerous beneficial impacts to the project and the community in which they would be located. These include

- The beneficial impact of providing newer and larger vehicles with greater carrying capacity
- The beneficial impact of the enhanced appearance of the new shelters and the provision of better protection for riders
- The beneficial impact of using pre-paid fares, which can reduce boarding time
- The beneficial impact of providing increased accessibility to communities and the numerous activity centers along the corridor through the use of higher-capacity vehicles and enhanced station facilities
- The beneficial impact of providing a safe station environment with increased security lighting, which in turn, along with an enhanced station appearance, would enhance the neighborhood character

Therefore, environmental *benefits* would result from these two project components. The new vehicles and the new stations would operate and be located in, respectively, the public right-of-way within a highly urbanized environment. The appearance of these project components, as well as the increased function that they provide to the overall transit system, serves to make these components attractive additions to the corridor urban context. In

addition, the vehicles would meet or exceed MTA design criteria, particularly for noise and energy efficiency (they would be low-emission, CNG buses). The stations would also be designed to not interfere with the visibility of adjacent businesses and business signage, to be energy efficient, and to provide increased security and protection for the bus rider.

Impacts associated with the operation of the peak period lane would have environmental impacts, and these are discussed in Sections 3.2 to 3.8. The impacts associated with the reconstruction of the curb lane are described separately as the issues associated with construction are different from those of operation. Reconstruction and repair of the curb lane is independent of this decision to implement a peak-period, dedicated bus lane. Lane reconstruction and repair is proposed to go forward, even if no dedicated transit lanes are implemented. Many of the environmental impacts associated with the lane reconstruction would occur only during the time of the construction, and would be temporary and short-term. A Construction Mitigation Plan has been developed to reduce the impacts associated with the lane reconstruction.

3.2 TRAFFIC AND CIRCULATION

This section summarizes the transportation environment in the Mid-City/Westside Study Area for both the base year of 2000 and the forecast year of 2020. This summary is based on the findings of the full Traffic and Circulation report, which is included in Section 3.2 of the Draft EIS/EIR and incorporated by reference herein.

Transportation improvements in this Corridor Area are being studied in part, for the following reasons:

- Major concentration of activity centers and destinations
- High employment and population densities
- Substantial transit-dependent population
- High levels of existing and projected future travel demand
- Existing traffic congestion
- Projected worsening of congestion in the future
- Mixed-flow operations slows buses
- Constrained transportation facilities

3.2.1 Setting

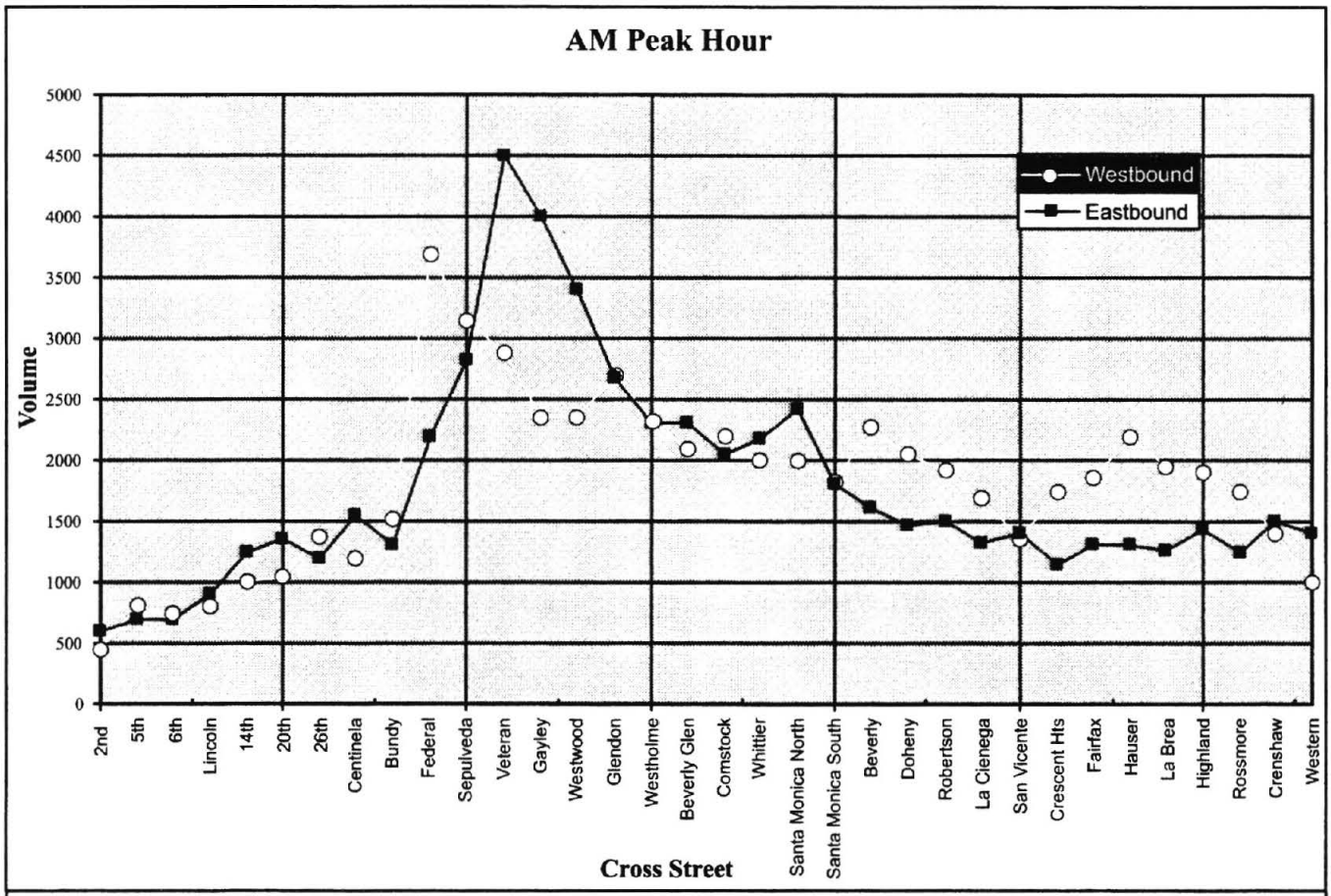
The highway transportation system in the Study Area is comprised of a well-defined grid of arterials and freeways generally following a north/south–east/west orientation.

The study area's freeways and streets carry some of the highest traffic volumes in southern California. A total of 1.9 million vehicle-miles are traveled during the evening peak hour on the streets and freeways within the Corridor.

During the evening peak hour, a total of approximately 76,000 vehicle hours of travel occur on the corridor's streets and freeways, with approximately 52,000 vehicle hours, or almost 70 percent of evening peak hour travel taking place on surface streets.

Traffic volumes and congestion vary along the corridor, with the worst conditions in the Beverly Hills and Westwood/I-405 segments. The volumes start from about 1,500 vehicles per hour in Downtown Los Angeles, gradually increase from east to west and peak sharply to 3,000 to 4,500 vehicles per hour levels in Westwood. Then the volumes drop off significantly west of the I-405 Freeway, as a large volume of traffic gets on or off the freeway. West of the I-405, the volumes gradually decrease to about 500 to 1,000 vehicles per hour at the western end of Santa Monica. Figure 3.2-1 graphically shows the distribution of traffic along Wilshire Boulevard.

The existing arterial segment congestion is relatively spread-out over most of the study area's major arterials, with no major differences between links that are congested in A.M. or P.M. peaks. Figure 3.2-2 shows the segments that are currently operating at an unacceptable level of service.



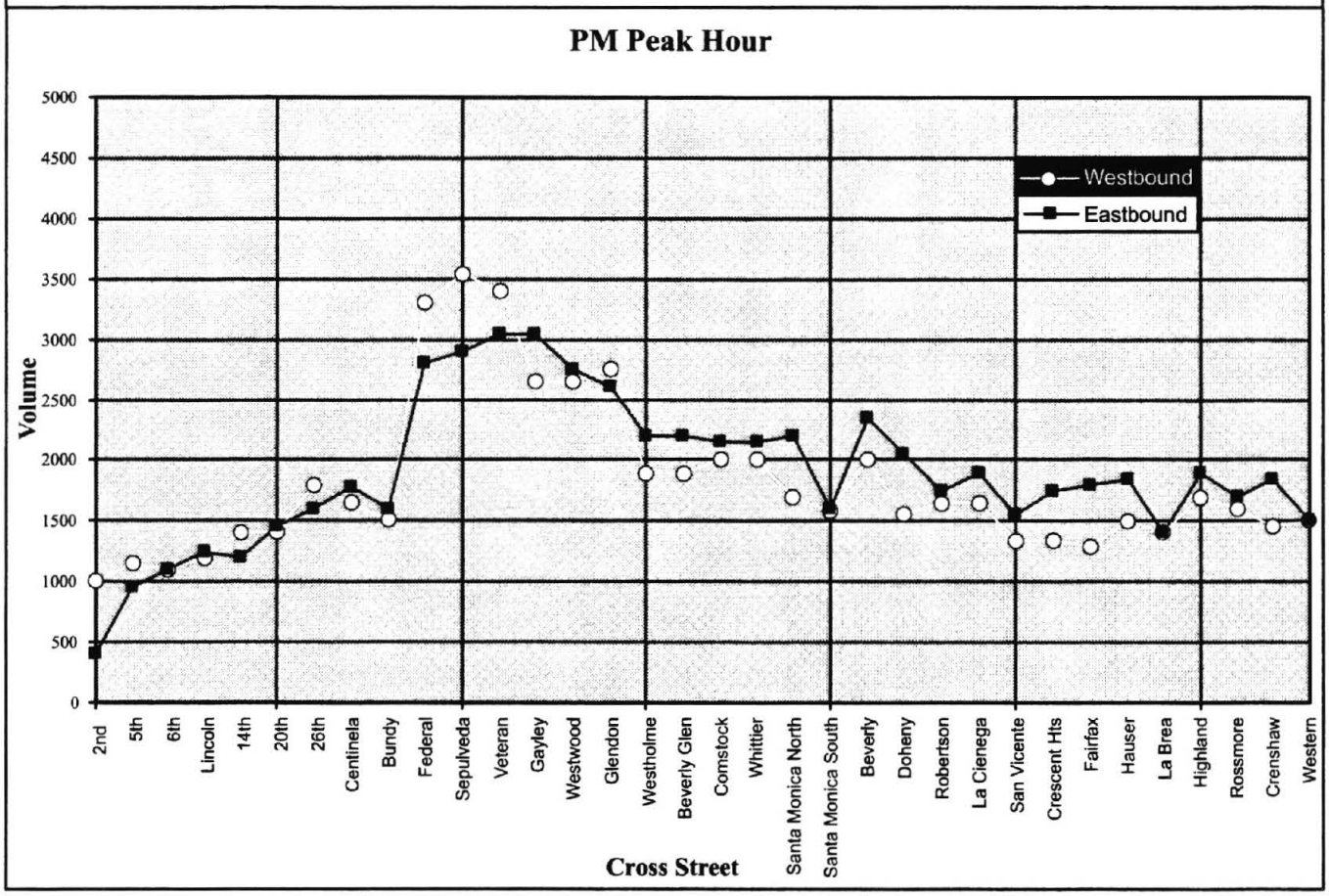
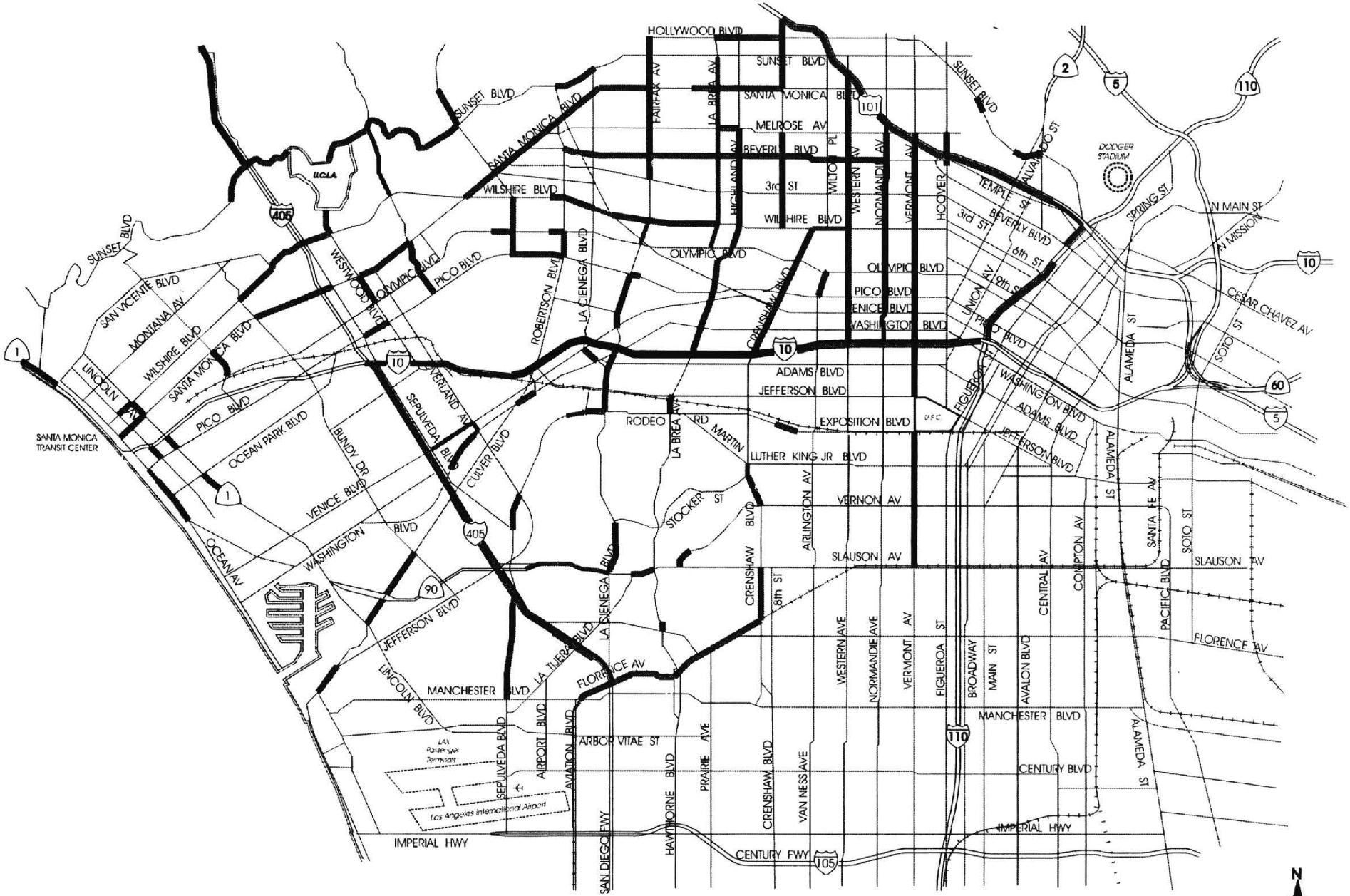


FIGURE 3.2-1
EXISTING VOLUMES ON WILSHIRE BOULEVARD AT STUDY INTERSECTIONS



SOURCE: Meyer, Mohaddes Associates, Inc.

Mid-City/Westside Transit Corridor

LOS ANGELES COUNTY METROPOLITAN TRANSPORTATION AUTHORITY

FIGURE 3.2-2

1998 EXISTING AM PEAK HOUR
ARTERIAL SEGMENTS WITH LOS E OR F

Existing traffic patterns and forecast 2020 conditions both indicate that there is strong east/west travel demand within the study area along four major east-west corridors including: Santa Monica Boulevard, Wilshire Boulevard, Santa Monica Freeway and Exposition/Venice Boulevards. Figure 3.2-3 shows those segments that are projected to operate at unacceptable levels of service in 2020. None of these corridors are currently served by a high capacity transit system.

3.2.2 Transit Service

The Wilshire corridor is one of the highest volume transit corridors in the country. Based on the census data, 41 percent of all work transit trips in Los Angeles County originate in the Mid-City/Westside Study Area. In addition to the high transit mode split of 14 percent, the Study Area has a significantly higher use of transit than the rest of Los Angeles County. This demand warrants a much higher percentage of transit investment than it has received in the last fifteen years.

There are currently over 100,000 daily boardings on the bus lines operating along the Wilshire Boulevard Corridor. Ridership along the Metro Rapid Bus has increased by more than 25 percent, since the initiation of the Metro Rapid Bus service in June 2000.

The Corridor's transit trips are expected to increase at a much higher rate than total trips, by 26 percent, from the 1998 level of 662,000 to 834,000 by 2020. It should be noted that this is based on the No Action Alternative, with no major transit improvements in the east-west corridor. Several key points can be concluded from the above analysis, which point to the importance of future transit service:

- The Mid-City/Westside Corridor is a highly significant origin and/or destination point for trips in southern California, especially for transit trips, over 41 percent of which have one end in the Corridor
- The Corridor has a significantly higher transit mode split than the region as a whole, and the trend is expected to increase (from nearly 2.5 to 2.8 times the regional mode split)
- The Corridor currently has a very high internal trip retention (over half of all trips), and despite growth in regional trips, is expected to maintain these high internal trip retention percentages

Existing Metro Rapid buses experience slower operating speeds in the Beverly Hills and Westwood/I-405 segments of the corridor due to operations in mixed flow congested traffic.

3.2.3 Project Impacts

Traffic Diversion. Operation of Peak-Period, dedicated bus lanes on Wilshire Boulevard appears to cause some traffic diversion onto the Santa Monica Freeway. **The Santa Monica Freeway would experience as much as a 1.25% increase in traffic in the A.M. peak hour, if the dedicated transit lane were implemented throughout the entire Wilshire Boulevard Corridor from Western Avenue to the City of Santa Monica. This would be considered a significant impact.**



SOURCE: Meyer, Mohaddes Associates, Inc.

Mid-City/Westside Transit Corridor

LOS ANGELES COUNTY METROPOLITAN TRANSPORTATION AUTHORITY

FIGURE 3.2-3

2020 NO ACTION PM PEAK HOUR
ARTERIAL SEGMENTS WITH LOS E OR F

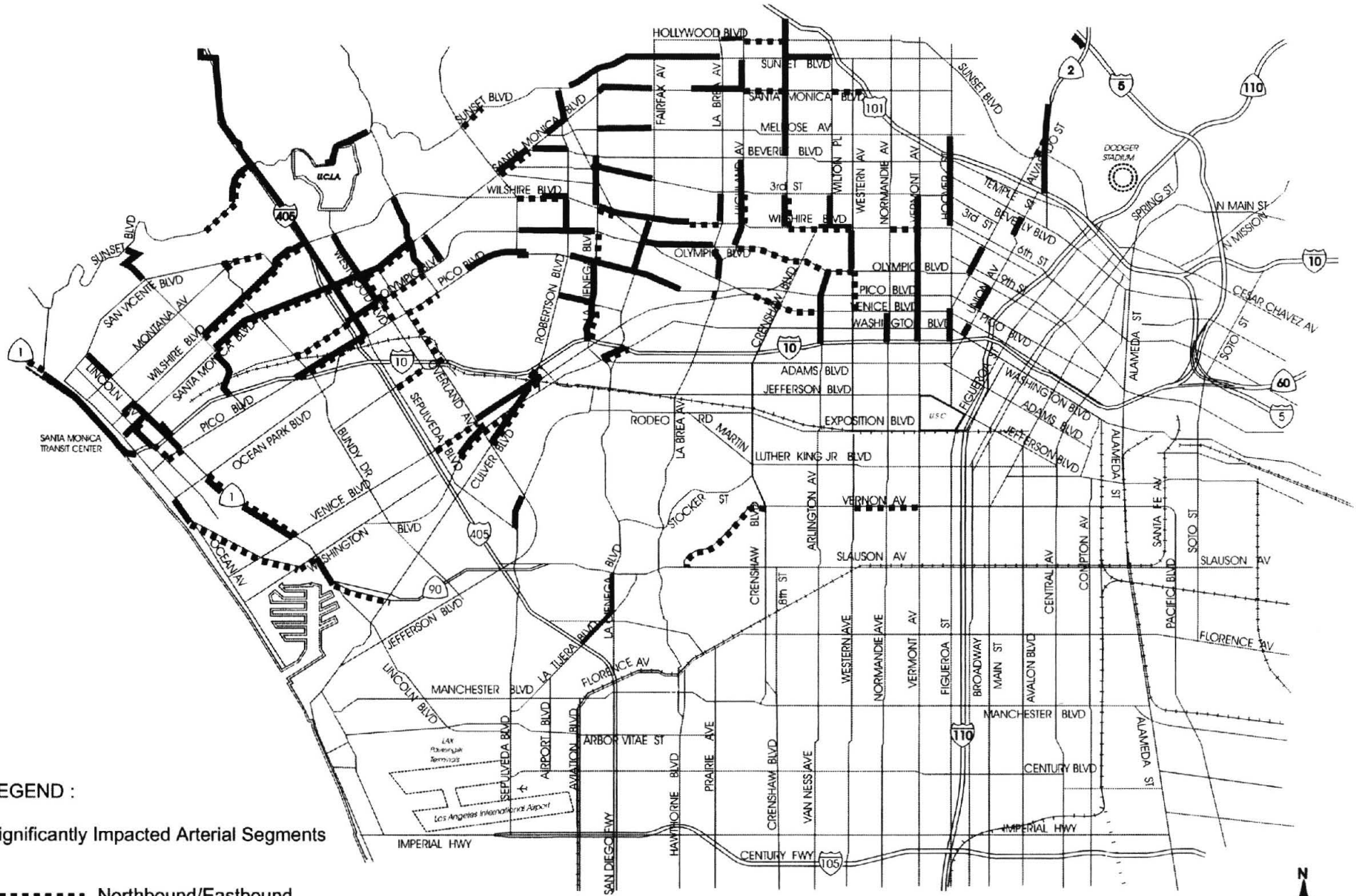
As a general trend, the Wilshire Corridor shows a significant decrease in traffic capacity due to the reduction of one travel lane in each direction on Wilshire Boulevard during the peak period. The drop shows two distinct phenomena: some vehicle trips are converted to transit trips, and some of the vehicle trips are diverted to other east/west streets and freeways across the entire length of the corridor.

This traffic diversion affects most major streets between Sunset Boulevard and the Santa Monica Freeway. Peak hour traffic volumes on Wilshire Boulevard itself are expected to be reduced by as much as 25 to 50 percent in certain locations compared to the No Action Alternative due to the loss of the traffic lane. This decrease in volumes, which is in the range of 300 to 500 vehicles per hour per peak direction, will be spread relatively evenly across most of the east-west facilities (freeway and arterials) throughout the entire corridor. The predicted shifting of the traffic volumes will help keep traffic congestion on Wilshire Boulevard from reaching extreme levels with the proposed lane drop and the operation of the BRT. At the same time, the relatively even distribution of diverted traffic across the study area's arterial grid system with many east-west arterials will also diffuse the extent of the negative traffic impacts on any particular east-west facility. Figure 3.2-4 shows the arterial street segments that will be significantly impacted by the diversion of traffic from Wilshire Boulevard in the A.M. peak hour.

Increase in People—Moving Capacity. While the capacity of Wilshire Boulevard to carry non-transit vehicles may be reduced due to the conversion of a mixed-flow lane to a bus lane, with the Wilshire BRT, the person-carrying capacity of Wilshire Boulevard increases. In terms of daily person-carrying capacity, the conversion of a lane from mixed-flow operations to a dedicated BRT lane increases the overall capacity of the corridor by over 40 percent. Figure 3.2-5 shows the person carrying capacity of Wilshire Boulevard with and without the BRT. With the peak-period dedicated BRT lane, the auto carrying capacity decreases by 15 percent. The decrease in auto carrying capacity is not one third because the curb lane does not have as much capacity as the other lanes and right-turning vehicles are still allowed to use the lane.

Traffic Diversion in Neighborhoods. The operation of the Wilshire BRT may result in the redistribution of traffic along Wilshire Boulevard into adjacent neighborhoods and onto adjacent parallel streets/arterials, primarily due to the reduction in capacity along Wilshire Boulevard.

Impacts on Pedestrian Circulation at Crosswalks. Due to its more traditional curbside transit operation and station locations, the proposed project will have little or no negative effects on pedestrians, who will be accessing the stations located in the sidewalk area. There may be some potential for vehicular conflict with buses and right turning vehicles, which will be allowed into the bus lane to make right-turns. However, this also is a relatively conventional operation, which should not result in significant effects, other than slower bus operations. In order to safely clear right-turning vehicles out of the path of a Rapid Bus, consideration is being given to the installation of right-turn arrows, which would give a positive signal to drivers to turn onto the side street. At the same time, this will hold pedestrians on the sidewalks and provide a pedestrian "WALK" signal after the right turns have cleared and the Rapid Bus is passing through the intersection parallel to the crosswalk.



LEGEND :

Significantly Impacted Arterial Segments

Northbound/Eastbound
Southbound/Westbound

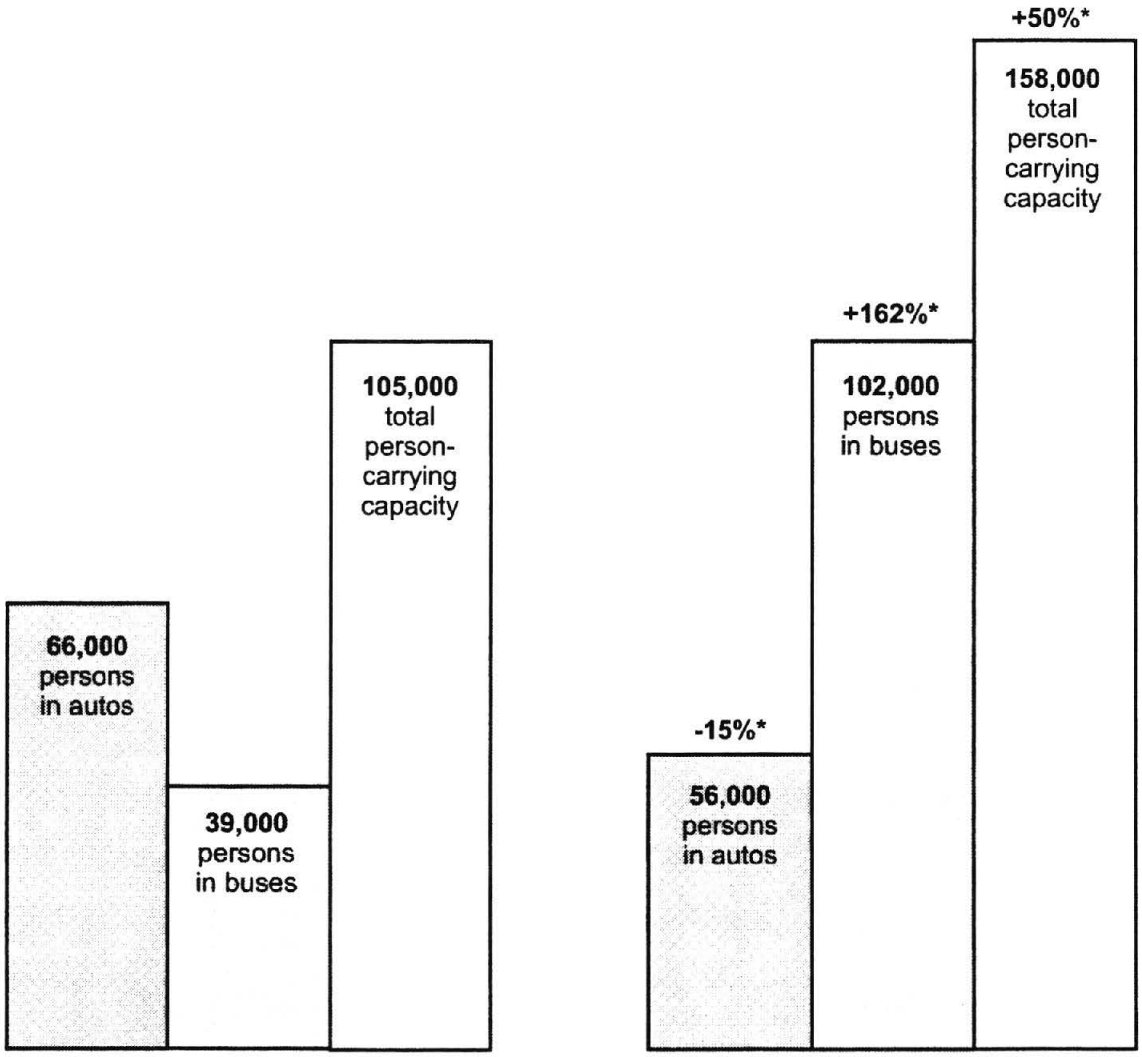
SOURCE: Meyer, Mohaddes Associates, Inc.

Mid-City/Westside Transit Corridor

LOS ANGELES COUNTY METROPOLITAN TRANSPORTATION AUTHORITY

FIGURE 3.2-4

AM PEAK HOUR IMPACTED ARTERIAL SEGMENTS ALTERNATIVE 1



No Action Alternative
(3 Lane Segment)

Wilshire BRT Peak Period
(3 Lane Segment)

* % Increase/decrease compared to No Action Alternative

SOURCE: Myer, Mohaddes Associates

Mid-City/Westside Transit Corridor
LOS ANGELES COUNTY METROPOLITAN TRANSPORTATION AUTHORITY

FIGURE 3.2-5
DAILY PERSON-CARRYING CAPACITY
OF WILSHIRE BOULEVARD

3.2.4 Mitigation Measures

The following mitigation measures are proposed to reduce the impacts of the traffic diversion caused by the loss of one mixed flow lane in each direction on Wilshire Boulevard:

Mitigation Measure 3.2-1 If the dedicated bus lane were to be implemented in the City of Los Angeles, the MTA would assist the City of Los Angeles City Department of Transportation to implement the Advanced Traffic Control System (ATCS) in the Mid-City/Westside Study Area. A total of 433 signalized intersections in the following ATSAC project areas will be upgraded to the ATCS system: Mid-Wilshire, Wilshire-West, Westwood, West Los Angeles, and Santa Monica Freeway-Smart Corridor. Funding will be added to the project budget to finance the ATCS system in this area.

Mitigation Measure 3.2-2 If the dedicated bus lane were to be implemented in the City of Beverly Hills, the MTA would coordinate with the City of Beverly Hills to identify traffic operations improvements, similar to the ATCS system in Los Angeles, to mitigate the impacts of any diversion of traffic from Wilshire Boulevard to alternate arterial streets. Streets, which could be candidates for signal system upgrade, include North and South Santa Monica Boulevards and Burton Way, with about 23 traffic signals.

Mitigation Measure 3.2-3 If the transit lane were implemented, operational and/or geometric improvements would be implemented to reduce the impacts of the Wilshire BRT:

Hauser Boulevard/Sixth Street

Re-stripe northbound approach to a left-turn lane and a shared through-right turn lane

Re-calibrate signal timing

Mitigation Measure 3.2-4 If the transit lane were implemented, the following signals will be retimed to reduce delay:

Wilshire Boulevard/Federal Avenue/San Vicente Boulevard

Sepulveda Boulevard/Wilshire Boulevard

Gayley Avenue/Wilshire Boulevard

Westwood Boulevard/Santa Monica Boulevard

Glendon Avenue/Wilshire Boulevard

Whittier Drive/Wilshire Boulevard

South Santa Monica Boulevard/Wilshire Boulevard

Spalding Drive/Olympic Boulevard

The following intersections have significantly unavoidable impacts since feasible operational measures considered at these intersections would not mitigate all identified impacts:

Westwood Boulevard/Wilshire Boulevard

La Cienega Boulevard/Wilshire Boulevard

Mitigation Measure 3.2-5

LADOT and City staff in the City of Beverly Hills shall monitor traffic conditions on residential streets adjacent to the Wilshire BRT to determine if the project results in adverse impacts on residential streets. They shall prepare traffic mitigation programs for each impacted neighborhood in coordination with the affected residents. MTA shall include in the project budget funds to reimburse the local jurisdictions for the cost of such monitoring, outreach, and implementation for neighborhood traffic management programs.

3.3 PARKING

3.3.1 Introduction

This section provides information relative to parking issues affected by the proposed Wilshire BRT. The proposed project will only affect on-street parking in a limited segment of Wilshire Boulevard in West Los Angeles, where parking is not currently prohibited during peak periods. The project will also include the upgrading of two existing MTA-owned parking facilities: one at Crenshaw Boulevard and one at La Brea Avenue. A threshold of significance is defined in this section along with the methodology for evaluating parking-related impacts. It assesses on-street parking inventories relative to proposals for the peak period elimination of such parking in order to accommodate the BRT. Finally, this section discusses parking management measures designed to mitigate the impact of removing on-street parking.

3.3.2 Affected Environment

■ Parking Inventory

On-Street Parking

The number of on-street parking spaces along the Wilshire Boulevard BRT Corridor from Western Avenue in Los Angeles to Ocean Avenue in Santa Monica was quantified, as is presented by Table 3.3-1. At least five categories of on-street parking were surveyed including: metered spaces; unmetered spaces; commercial loading zones; taxi/valet passenger loading; handicapped/senior citizen zone; and school bus zone. The following table provides a summary of the parking spaces by the various categories that were surveyed.

Table 3.3-1 Wilshire Boulevard BRT Corridor Existing Parking by City and Segment

Segment	*Endpoints*	*Metered Spaces*	*Unmetered Spaces*	*Commercial/ Loading Zones*	*Taxi/Valet Passenger Loading Zones*	*Disabled/ Seniors*	*Total Spaces*
Segment I—Los Angeles							
1	Western to Gramercy	45	—	—	3	—	48
2	Wilton to Norton	26	1	—	1	—	28
3	Highland to La Brea	4	20	—	—	—	24
4	Detroit to Cochran	19	14	—	—	—	33
5	Dunsmuir to Ridgeley	11	23	2	—	—	36
6	Hauser to Curson	42	—	—	—	—	42
7	Stanley to Orange Grove	56	—	—	5	—	61
8	Fairfax to San Diego	38	—	4	9	—	51
9	Crescent Heights to San Vicente	38	—	12	7	—	57
Subtotal		*279*	*58*	*18*	*25*	*0*	*380*

Table 3.3-1 Wilshire Boulevard BRT Corridor Existing Parking by City and Segment

Segment	Endpoints	Metered Spaces	Unmetered Spaces	Commercial/ Loading Zones	Taxi/Valet Passenger Loading Zones	Disabled/ Seniors	Total Spaces
Segment II—Beverly Hills							
1	San Vicente to Hamilton	19	5	—	—	—	24
2	La Cienega to Willman	36	—	—	1	—	37
3	Robertson to Doheny	54	—	—	5	—	59
4	Oakhurst to Rexford	27	—	—	1	—	28
5	Elm to El Camino	—	—	2	5	—	7
Subtotal		*136*	*5*	*2*	*12*	*0*	*155*
Segment III—Westwood							
1	Comstock to Devon	—	29	3	1	—	33
2	Beverly Glen to Malcolm	—	57	2	18	—	77
Subtotal		*0*	*86*	*5*	*19*	*0*	*110*
Segment IV—West Los Angeles							
1	Federal to Brockton	60	—	3	1	—	64
2	Saltair to Bundy	55	—	—	6	—	61
3	Amherst to Carmelina	39	—	—	3	—	42
Subtotal		*154*	*0*	*3*	*10*	*0*	*167*
Segment V—Santa Monica							
1	Centinela to Berkley	45	—	—	—	—	45
2	Stanford to Princeton	66	—	—	—	—	66
3	26th to 24th	66	—	—	—	—	66
4	23rd to 21st	41	—	—	—	—	41
5	20th to 18th	49	—	—	—	—	49
6	17th to 15th	45	—	—	—	—	45
7	14th to 12th	52	—	—	1	—	53
8	11th to 9th	38	—	—	—	—	38
9	Lincoln to 6th	47	—	—	—	1	48
10	5th to 2nd	55	—	—	3	—	58
Subtotal		*504*	*0*	*0*	*4*	*1*	*509*
Grand Total		**1,073**	**149**	**28**	**70**	**1**	**1,321**

The majority of spaces on Wilshire Boulevard is metered and has time limits on length of stay. Along much of Wilshire Boulevard parking is also prohibited during peak hours. Peak hour parking prohibitions are in place along Wilshire Boulevard in Segment I and III in Los Angeles and Segment II in Beverly Hills, but not in Segment IV in West Los Angeles, nor Segment V in Santa Monica.

3.3.3 Impact Assessment

■ Standards of Significance

It is difficult to develop a threshold of significance relative to parking along a given corridor that can be used to assess parking impacts from a quantitative standpoint. Such an approach is easier to discuss when evaluating the adequacy of parking for an individual building or development, rather than trying to take into account a 15-mile corridor. Local jurisdictions have the ability to regulate the use of on-street parking and to prohibit it. The loss of on-street parking may or may not affect the nearby businesses or residents, depending upon the utilization rate of the spaces being removed and the availability of alternative off-street parking or on-street parking on nearby streets. The loss of on-street parking, however, is often perceived as an impact on businesses, particularly retail businesses, by the proprietors of those businesses. Some of the impacts manifest themselves in other areas that can only be qualitatively discussed. These areas deal with qualitative issues such as personal inconvenience, access impacts to businesses, supply of goods by delivery trucks, access issues for taxicabs/ valet services and physically challenged persons, safety concerns resulting from the removal of the parking buffer zone between the sidewalk and through traffic and the elimination of a refuge area for emergency parking, accidents and breakdowns.

■ Methodology for Impact Evaluation

The methodology for evaluating the impacts of peak period removal of on-street parking to accommodate the BRT will consider a number of factors. The evaluation will address such issues as convenience, access, safety, business disruption, and the need for parking replacement. It also reflects the fact that no new park-and-ride lots are being proposed for the Wilshire Boulevard corridor to accommodate and attract new transit patrons. Access to the stations on the Wilshire corridor will be via transit usage (transfers) and walking. The two parking lots that may be upgraded along Wilshire Boulevard on property owned by the MTA would be used primarily as supplemental parking for local land uses, with any net increase in spaces being designated for transit riders' use.

■ Parking Impacts

No Action Alternative (Baseline)

The No Action Alternative would not affect parking along Wilshire Boulevard. As noted earlier, the local jurisdictions have the authority to impose limitations on the use of on-street parking, so the No Action Alternative could include changes to on-street parking conditions implemented by the local jurisdictions, but such actions would be independent of the transit operations on these corridors.

Transportation System Management (TSM) Alternative

The TSM Alternative would not affect parking along Wilshire Boulevard. As noted earlier, the local jurisdictions have the authority to impose limitations on the use of on-street parking, so the TSM Alternative could also include changes to on-street parking conditions implemented by the local jurisdictions, but such actions would be independent of the transit operations on these corridors.

Wilshire BRT (Peak Period, Curb Adjacent Design)

Access and Convenience. The Curb Adjacent Design, when implemented during peak periods only, will have limited parking impacts. Parking is already prohibited along most of Wilshire Boulevard during peak periods. The only segment where this peak period parking prohibition would be new will be between Federal Avenue and Centinela Avenue in West Los Angeles. In this segment of the corridor, there are 167 on-street spaces, including 154 metered spaces, 3 commercial loading zones, and 10 passenger loading zones. Utilization surveys were conducted over a three-day time period to determine how many of these spaces are currently utilized in the peak periods, and whether or not there were alternate spaces available nearby. The results of these utilization surveys are shown in Table 3.3-2.

Table 3.3-2 Parking Utilization on Wilshire Boulevard in West Los Angeles

Time Period	Federal to Barrington		Barrington to Bundy		Bundy to Centinela		Total
	North Side	South Side	North Side	South Side	North Side	South Side	
6:00 A.M.	1	0	5	3	1	8	17
6:30 A.M.	1	0	7	4	1	10	22
7:00 A.M.	1	0	10	5	2	9	25
7:30 A.M.	0	0	8	6	4	6	24
8:00 A.M.	0	0	9	5	5	6	24
8:30 A.M.	0	0	12	5	7	11	36
9:00 A.M.	0	0	11	8	10	13	43
9:30 A.M.	0	0	17	10	10	19	57
10:00 A.M.	0	0	14	12	12	17	55
Average Parking Occupancy in A.M. Peak Period							**34**
3:00 P.M.	4	0	29	19	18	19	89
3:30 P.M.	3	0	32	20	17	18	90
4:00 P.M.	0	0	32	14	16	18	79
4:30 P.M.	0	0	36	13	17	15	81
5:00 P.M.	0	0	34	15	14	15	75
5:30 P.M.	0	0	32	15	16	14	77
6:00 P.M.	0	0	35	17	15	13	81
6:30 P.M.	0	0	34	22	17	12	86
7:00 P.M.	1	0	39	30	16	14	99
Average Parking Occupancy in P.M. Peak Period							**84**

During most of these time periods, from 7:00 to 10:00 A.M. and 4:00 to 6:00 P.M., parking is already prohibited on the blocks between Federal and Barrington, effectively reducing the supply to 103 spaces. The utilization data illustrate that the reduced peak period supply of 103 spaces in this segment of Wilshire Boulevard is on average

only 33 percent utilized during the A.M. peak period and 82 percent utilized during the P.M. peak period, indicating that there is not a severe parking shortage in this area.

Most of the developments along this segment have some off-street parking available, off accessed off the alley behind the businesses. There is also on-street parking on the 14 side streets that intersect Wilshire Boulevard in this segment. The availability of on-street parking on the first block of these side streets, north and south of Wilshire was evaluated. In the A.M. peak period, an average of 135 spaces was available on these side streets over a three-day time period from 6:00 A.M. to 10:00 A.M. Similar data was collected for the P.M. peak period on a typical day. On average, between 3:00 P.M. and 6:30 P.M., 118 spaces were observed as available side street parking. **There is sufficient alternate parking available to reduce the impact of the on-street peak period parking prohibition to a less than significant impact.**

The implementation of new far side bus stops in the City of Santa Monica will result in the loss of nine parking spaces on a 24-hour basis. **The loss of these spaces on a permanent basis could exacerbate the already tight parking situation in the City of Santa Monica and would be considered a significant impact.**

Safety. The Curb Adjacent Design will result in the removal of the buffer between moving traffic and pedestrians on the sidewalk, but it will also reduce vehicular conflicts associated with parking activity. Safety impacts would be beneficial.

Station Area Parking Spillover Impacts. It is not anticipated that the Wilshire BRT project will result in any significant parking impacts on the streets surrounding the BRT stations. Station area spillover parking impacts would be less than significant.

Parking Facilities

No parking lots have been explicitly provided for parking purposes along the Wilshire BRT route. However, it should be noted that the MTA currently owns two sites on Wilshire Boulevard (located at Crenshaw Boulevard and La Brea Avenue), which would be used as parking facilities. Plans for these parking facilities include reconfiguration, repaving, and restriping of the existing lots, landscaping and lighting improvements. These improvements will not create new parking demands in the vicinity of the parking lots and will therefore not change parking conditions significantly in the vicinity of the lots.

The reconfiguration and upgrading of these parking facilities will have a beneficial impact on parking.

Maintenance Yard

The site selected for the maintenance yard for buses or light rail vehicles will be designed to accommodate all of the transit vehicle and employee parking on site. A parking structure is included in the proposed site plan to provide adequate employee parking. The maintenance yard will not affect on-street parking on adjacent streets and will not cause any parking impacts. There would be no impacts to parking as a result of maintenance yards.

3.3.4 Mitigation Measures

Parking Replacement Mitigation

Mitigation Measure 3.3-1 The MTA shall contribute $90,000 to the City of Santa Monica Parking Fund, which the City utilizes to provide public parking in consolidated parking facilities, to offset the loss of nine on-street parking spaces.

3.3.5 Cumulative Impacts

The reduction of the amount of on-street parking or the use of on-street parking by transit users in station areas will have the cumulative impact of making it increasingly more difficult to find an available on-street parking location. This will result in a significant adverse affect in areas where the supply of off-street parking is not adequate to fully meet the needs of the land uses generating the parking demand. This is a cumulative effect of developments being built with inadequate parking. Over the years, many of the local jurisdictions along this potential transit corridor did not require adequate off-street parking and in some instances did not require any off-street parking. This has caused many of the land uses in older buildings along this corridor to depend on the use of on-street parking to meet their employee and customer parking needs. The local jurisdictions all have parking programs designed to address this cumulative parking impact either through the provision of off-street public parking or the regulation of the use of on-street parking.

3.4 LAND ACQUISITION/DISPLACEMENT AND RELOCATION

3.4.1 Introduction

This section addresses project requirements for land acquisition, displacement, and/or relocation of existing land uses. The Wilshire BRT project bus route and stations would be located entirely within a public right-of-way and no acquisition would be required. There are some actions related to the Locally Preferred Alternative, however, that may require that a business or residence be removed. Specific actions that would cause displacement, include

- Acquisition of private property for maintenance yard
- Acquisition of private property for parking facility sites along Wilshire Boulevard

3.4.2 Affected Environment

The affected environment includes the maintenance facility site (corner of Cesar Chavez Avenue and Mission Road) and the two parking facilities (one at Wilshire and Crenshaw Boulevards and the other at Wilshire Boulevard and La Brea Avenue).

3.4.3 Impact Assessment

■ Standards of Significance

For purposes of this environmental evaluation, a significant land acquisition and displacement impact may occur when

- Real property is acquired and business or residential owners or tenants are required to relocate

3.4.4 Impacts

■ No Action Alternative (Baseline)

The No Action Alternative would involve increases to the bus operations fleet and minor transit service restructuring. It would not involve the acquisition of real property. No impacts would occur.

■ Transportation System Management (TSM) Alternative

The TSM Alternative would involve operational and route restructuring improvements, along with extensions of the MTA Rapid Bus service and corridors. No land acquisition or displacement is involved from these activities, and no impacts would occur.

■ Locally Preferred Alternative: Wilshire BRT

The BRT Alternative would operate entirely within a public right-of-way and no land acquisition or displacement would be required. Therefore, no impacts would occur.

■ Maintenance Facility

Development and operation of the proposed maintenance facility site would require expansion through the addition of approximately 8.6 acres adjacent to the existing MTA Division 10 facility. This property currently contains a salvage yard, soil storage, and two auto-related businesses. These parcels are currently held by two owners who have indicated through a realtor their interest in selling the property to MTA. Any businesses located on this site at the time of the MTA purchase would be subject to mitigation identified below, which would provide relocation assistance where applicable. In addition, if the property is not bought through a willing seller, MTA would need to exercise eminent domain to acquire the property. The property owners would also be subject to mitigation identified below. As a result, impacts would be less than significant.

■ Parking Facilities

Two parking facilities are planned on MTA-owned property: one at the southwest corner of Crenshaw Boulevard and Wilshire Boulevard and one at the northwest corner of La Brea Avenue and Wilshire Boulevard. The Crenshaw/Wilshire site would require the acquisition of one property that is currently occupied by a single-family residence. The owner of this property has indicated a willingness to be purchased since the property is currently surrounded by MTA-owned property that was purchased in the 1980s for the previously planned Metro Red Line expansion. If the property were purchased through a willing seller, then the seller would be compensated through a fair market value appraisal and purchase of the property. If the property were not willingly sold, then MTA would exercise eminent domain to acquire the property. Potentially significant impacts related to the acquisition of property through eminent domain would be mitigated through implementation of the mitigation measure below.

No property would be acquired for the La Brea/Wilshire parking facility site.

3.4.5 Mitigation

Impacts associated with the potential relocation of businesses located on the maintenance facility expansion site at time of purchase would be reduced to less than significant through implementation of Mitigation Measure 3.4-1.

Mitigation Measure 3.4-1 — Relocation assistance shall be provided to displaced properties per LACMTA policies and procedures.

3.4.6 Cumulative Impacts

With the exception of the potential acquisition associated with the Parking Facility at Wilshire/Crenshaw and the Maintenance Facility in Downtown Los Angeles, there would be no direct land acquisition associated with the Wilshire BRT. An adverse cumulative land-acquisition effect would occur where another public agency may exercise its authority to acquire or assemble property for public purposes, such as a redevelopment agency, school district, or nearby public works department. Along the Wilshire route, redevelopment projects are only in place in the City of Los Angeles. There are no redevelopment agencies or redevelopment projects in the City of Santa

Monica or Beverly Hills. The Community Redevelopment Agency of the City of Los Angeles's Koreatown Wilshire Center project area is the only area in the vicinity of the proposed project. However, there are no known or anticipated major redevelopment actions where business and residential displacement is expected. Thus, adverse cumulative impacts are not expected. In addition, the most recent plans of the Los Angeles Unified School District also do not indicate plans to acquire real property along Wilshire Boulevard west of Western Avenue. Impacts are expected to be less than significant.

3.5 VISUAL QUALITY

3.5.1 Introduction

This section evaluates the visual quality impacts of the proposed project alternatives.

■ Affected Environment

Wilshire Boulevard stretches from Downtown Los Angeles to Santa Monica, in a densely developed environment. As one travels west from Wilshire/Western, the development is dense and contains mainly high-rise office buildings, with some lower-scale (two- to five-story buildings) interspersed with these taller structures. The scale of the development remains fairly constant (high-rises interspersed with lower development) until west of the Barrington/Bundy station areas, where development becomes lower scale, and even further west toward Santa Monica, where views of the ocean begin to appear. Intermittent views of the Santa Monica Mountains are available between the taller buildings.

Commercial uses front both sides of the Corridor and the intersecting north/south streets along almost the entire length of the boulevard. The Corridor contains a variety of architectural styles that were in vogue at the time of construction, from the twenties to nineties, with structural façades that reflect these eras. The setback of development along the Boulevard varies, as does the presence of street trees and landscaped building frontages.

Wilshire Boulevard itself is a fairly wide street, with six travel lanes separated either by a continuous left-turn lane or by a median. Along most of the Boulevard, parked cars are visible along the curb lanes during non-peak times. The portion of Wilshire Boulevard between La Brea and Fairfax Avenues (the "Miracle Mile") has a landscaped median that provides some visual enhancement to the otherwise built environment of most of Wilshire Boulevard. Figures 3.5-1 through 3.5-3 provide street-level views of the Wilshire Corridor.

In some areas, the Corridor contains extra-wide sidewalks, street trees, planters, and landscaping. The portion of the boulevard that bisects the Los Angeles Country Club (between the Beverly Hills city limits and Comstock Avenue) contains shrubs and trees on both sides of the roadway.

The portion between Veteran Avenue and Federal Avenue/San Vicente Boulevard, which includes the Federal Building, the National Cemetery, and the Veterans Administration complex, contains extensive landscaped grounds. In addition, the portion of the Boulevard within the City of Los Angeles (east of Malcolm Avenue) has been designated a Scenic Highway, and the portion within the City of Santa Monica has been designated a Scenic Corridor.

Table 3.5-1 provides a listing of visual characteristics of the Corridor.

Wilshire Boulevard



Photo ① *Wilshire Boulevard (Park Mile) looking east.*



Photo ② *Wilshire Boulevard (Hancock Park) looking west.*

SOURCE: EIP Associates

Mid-City/Westside Transit Corridor

LOS ANGELES COUNTY METROPOLITAN TRANSPORTATION AUTHORITY

FIGURE 3.5-1
STREET-LEVEL VIEWS OF
THE WILSHIRE CORRIDOR
(PARK MILE & HANCOCK PARK)

Wilshire Boulevard

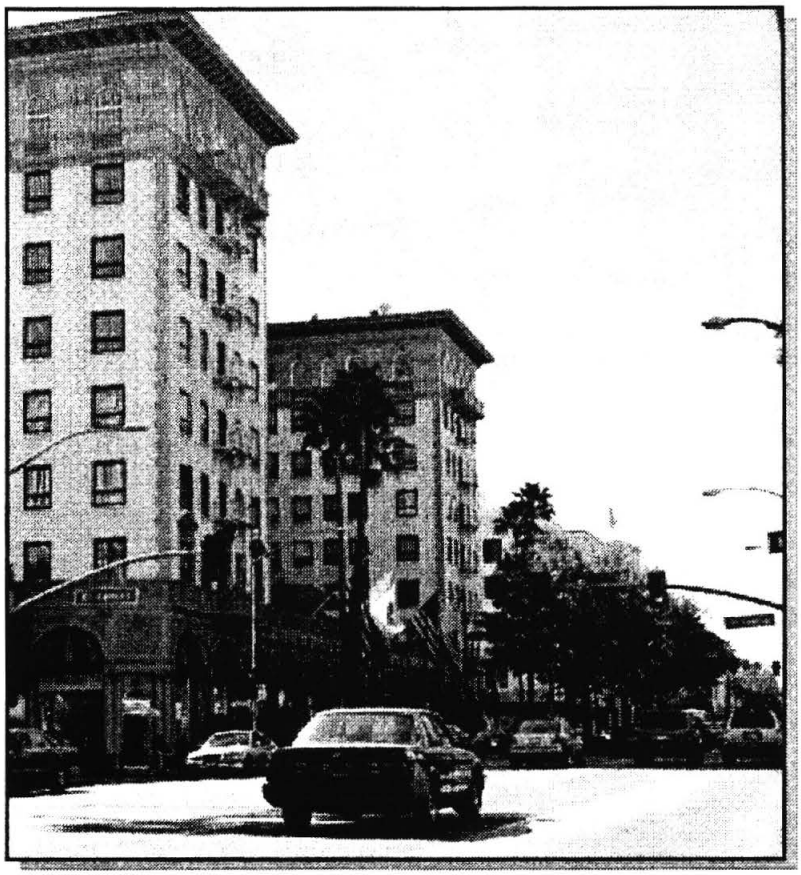


Photo ③ *Wilshire Boulevard (Beverly Hills) looking east.*

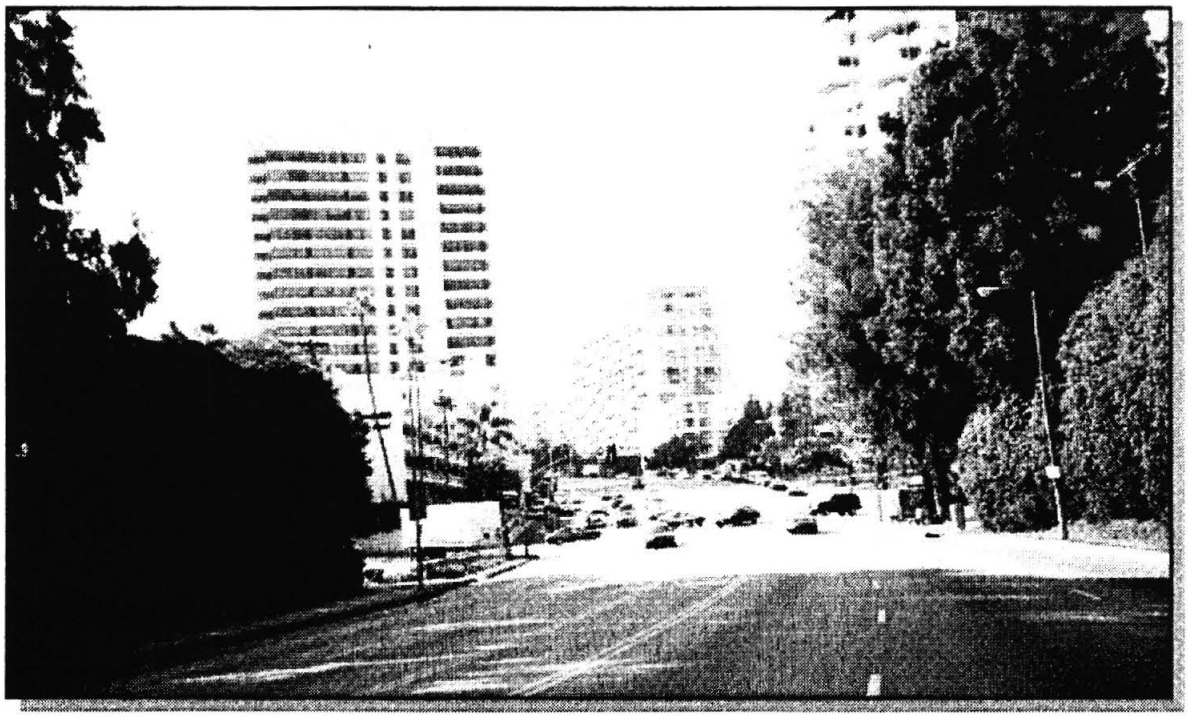


Photo ④ *Wilshire Boulevard (Los Angeles Country Club/Westwood) looking west.*

SOURCE: EIP Associates

Mid-City/Westside Transit Corridor

LOS ANGELES COUNTY METROPOLITAN TRANSPORTATION AUTHORITY

FIGURE 3.5-2
STREET-LEVEL VIEWS OF
THE WILSHIRE CORRIDOR
(BEVERLY HILLS & WESTWOOD)

Wilshire Boulevard



Photo ⑤ *Wilshire Boulevard (Santa Monica) (at Berkley) looking east.*

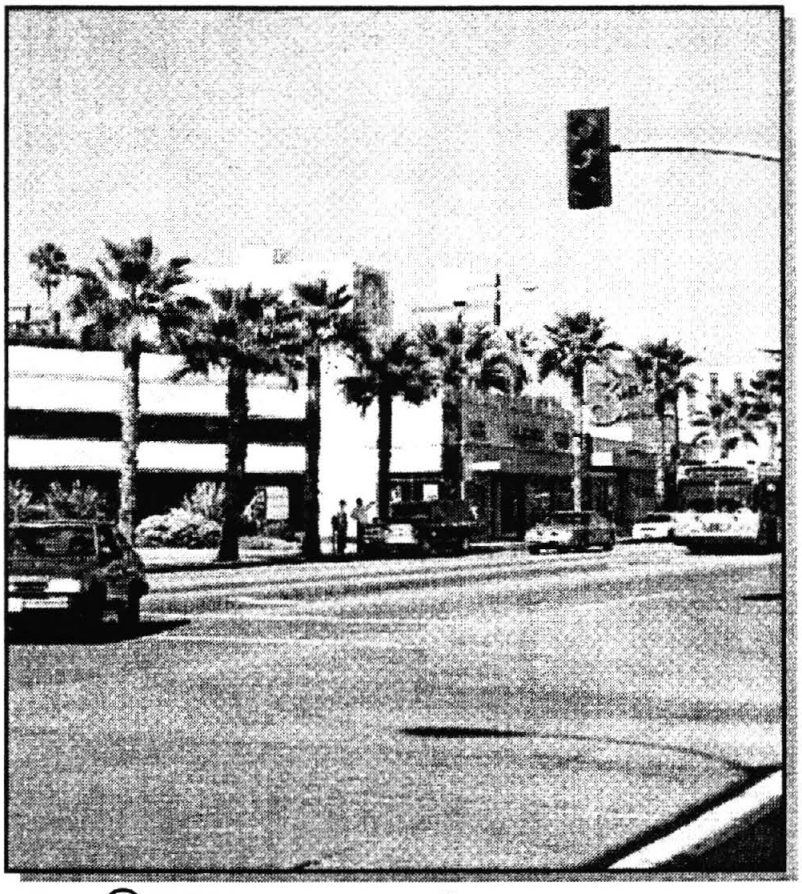


Photo ⑥ *Wilshire Boulevard (at 4th Street) looking east.*

SOURCE: EIP Associates

Mid-City/Westside Transit Corridor

LOS ANGELES COUNTY METROPOLITAN TRANSPORTATION AUTHORITY

FIGURE 3.5-3
STREET LEVEL VIEWS OF
THE WILSHIRE CORRIDOR
(SANTA MONICA)

Table 3.5-1 Corridor Visual Characteristics

Segment	Width of Roadway or Right-of-Way (Median)	Land Uses Along Corridor	Scale of Adjacent Buildings	Scenic Views/ Visual Elements
Wilshire Corridor				
Wilshire Boulevard Western to Wilton	70 feet, No median	Office, Retail	Mid- to Hi-Rise	**Views**: Hollywood Hills **Visual Elements**: street trees
Wilton to Highland	70 feet, No median	Office, Multi-Family Residential	Low- to Mid-Rise	**Views**: Wilshire Corridor, adjacent residential streets **Visual Elements**: landscaped residences, landscaping in building frontages, John Burroughs Middle School
Highland to La Brea	70 feet, No median	Office, Retail	Mid- to Hi-Rise	**Views**: Adjacent residential streets **Visual Elements**: landscaped median, landscaping in building frontages
La Brea to Fairfax	75 feet, 14 foot landscaped median	Museum District, Office, Retail	Mid- to Hi-Rise	**Views**: Hollywood Hills, Hancock Park, Santa Monica Mountains **Visual Elements**: landscaped median, landscaping in building frontages, Art Deco commercial buildings, La Brea Tar Pits, County Museum buildings
Fairfax to San Vicente	75 feet, No median	Retail, Office	Mid- to Hi-Rise	**Views**: Hollywood Hills **Visual Elements**: street trees
San Vicente to Santa Monica	70 feet, No median (some planters)	Retail, Office	Mid- to Hi-Rise	**Views**: Wilshire Corridor, Santa Monica Mountains, adjacent residential streets **Visual Elements**: street trees, landscaped median (discontinuous)
Santa Monica to Comstock	75 feet, No median	Retail, Residential, Open Space	Low- to Mid-Rise	**Views**: Downtown Los Angeles **Visual Elements**: street trees, landscaping in building frontages, Beverly Gardens Park, El Rodeo School, Los Angeles Country Club
Comstock to Westholme	80 feet, No median	Residential	Low- to Hi-Rise	**Views**: Wilshire Corridor **Visual Elements**: landscaping in building frontages
Westholme to Veteran	104 feet, No median	Residential, Office	Low- to Hi-Rise	**Views**: Wilshire Corridor, Westwood Village **Visual Elements**: landscaping in building frontages

Table 3.5-1 Corridor Visual Characteristics

Segment	*Width of Roadway or Right-of-Way (Median)*	*Land Uses Along Corridor*	*Scale of Adjacent Buildings*	*Scenic Views/ Visual Elements*
Veteran to Federal	80 feet, No median	Institutional	Low- to Mid-Rise	**Views:** Santa Monica Mountains, Westwood Village **Visual Elements:** Veterans Affairs grounds, Wadsworth Hospital, Wadsworth Theater, Federal Building grounds
Federal to Centinela	75 feet, No median	Retail, Office	Mid- to Hi-Rise	**Views:** Wilshire Corridor **Visual Elements:** intermittent street trees
Centinela to Lincoln	85 feet, No median	Retail, Office	Low- to Mid-Rise	**Views:** Santa Monica Mountains, Pacific Ocean **Visual Elements:** Douglas Park, street trees (palms)
Lincoln to Ocean	85 feet, No median	Retail, Office	Mid-Rise	**Views:** Santa Monica Mountains, Pacific Ocean, Wilshire Corridor **Visual Elements:** Christine Emerson Reed Park, street trees (palms)

3.5.2 Impact Assessment and Mitigation Measures

■ Standards of Significance

A significant adverse visual impact would occur if the alternatives would

- Remove mature trees and landscaping
- Obstruct or adversely change sensitive views
- Result in a loss of privacy for adjacent residences
- Create new sources of light and glare that would intrude on adjacent residential areas

3.5.3 Impacts

■ No Action Alternative (Baseline)

Removal of Mature Trees and Landscaping. The No Action Alternative would not require the removal of any mature trees or landscaping. Therefore, no impacts are anticipated.

Obstruction of Sensitive Views. The No Action Alternative would not result in the installation of any physical structures that would obstruct views of the surrounding Santa Monica Mountains, the ocean, or any other sensitive view in the Corridor. Therefore, no impacts are anticipated.

Loss of Privacy. The No Action Alternative would not introduce any project elements that would result in the loss of privacy to surrounding residences. Therefore, no impacts are anticipated.

Light and Glare. The No Action Alternative would not introduce any new sources of light and glare other than that emitted from new buses added to the fleet from this alternative. However, these sources of light and glare would not be a substantial increase the existing sources of light and glare and it is not anticipated that they would intrude into adjacent residential areas. Therefore, no impacts are anticipated.

■ Transportation System Management (TSM) Alternative

Removal of Mature Trees and Landscaping. The TSM Alternative would not require the removal of any mature trees or landscaping. Therefore, no impacts are anticipated.

Obstruction of Sensitive Views. The TSM Alternative would not result in the installation of any physical structures that would obstruct views of the surrounding Santa Monica Mountains, the ocean, or any other sensitive view in the Corridor. Therefore, no impacts are anticipated.

Loss of Privacy. The TSM Alternative would not introduce any project elements that would result in the loss of privacy to surrounding residences. Therefore, no impacts are anticipated.

Light and Glare. The TSM Alternative would not introduce any new sources of light and glare other than that emitted from new buses added to the fleet from this alternative. However, these sources of light and glare would not be a substantial increase over the existing sources of light and glare and it is not anticipated that they would intrude into adjacent residential areas. Therefore, no impacts are anticipated.

Locally Preferred Alternative: Wilshire BRT

Removal of Mature Trees and Landscaping. Under the Wilshire BRT Alternative, some street trees may be removed at certain station locations. The trees would be removed to accommodate the new bus shelters. However, these trees would be replaced and enhanced through the provision of station area landscaping. Therefore, the impact would be considered less than significant. It should be noted that the previous Draft EIS/EIR indicated that the landscaped median in Miracle Mile would be removed, however, the median-running alternative was deleted as a means of mitigating the impact from the removal of the median. The median would remain under this alternative. The remainder of the station areas, where trees would not be removed, would receive new landscaping treatments. This would be considered a beneficial impact of the project.

Obstruction of Sensitive Views. The Wilshire BRT Alternative would not result in the installation of any physical structures, with the exception of station shelters. These shelters would be located within the public right-of-way along the sidewalks. The shelters would be a maximum of 14 feet in height and would not obstruct sensitive views in the Corridor. It should also be noted that the shelters would be designed to not obstruct adjacent businesses and business signage. Therefore, no impacts are anticipated.

Loss of Privacy. The Wilshire BRT Alternative would not introduce any project elements that would result in the loss of privacy to surrounding residences (with the exception of the parking facilities discussed below). Therefore, no impacts are anticipated.

Light and Glare. The No Action Alternative would not introduce any new sources of light and glare other than that emitted from buses added to the fleet from this alternative (with the exception of the parking facilities discussed below). However, these sources of light and glare from the buses would not substantially increase the existing sources of light and glare and it is not anticipated that they would intrude into adjacent residential areas. Therefore, no impacts are anticipated.

Maintenance Facility

Removal of Mature Trees and Landscaping. Development of the maintenance facility would not require the removal of any mature trees or landscaping. Therefore, no impacts are anticipated.

Obstruction of Sensitive Views. Development of the maintenance facility would require the construction of a two-story parking facility, which would have the potential to obstruct surrounding views. The primary view in the area is from residences located on the east side of the 101 Freeway, looking toward the downtown skyline. These residences are located to the east of the maintenance yard site and are on a bluff 50 to 60 feet above the site. A new

two-story element added on the maintenance site would not obstruct this vista. Therefore, no impacts are anticipated.

Loss of Privacy. Development of the maintenance facility would occur in an industrialized portion of downtown Los Angeles. There are no residential areas in the immediate vicinity and therefore, there is no potential for a loss of privacy from this facility. Therefore, no impacts are anticipated.

Light and Glare. The maintenance facility would require the addition of security lighting on the site. The introduction of these new sources of light would not create a nuisance since there are no residential properties or other sensitive uses in the immediate vicinity. In addition, the facility would be located in an industrialized portion of downtown Los Angeles, which already contains numerous sources of light and glare. It is not anticipated that the light and glare at the maintenance facility would substantially change the level of light and glare in the surrounding area. Therefore, no impacts are anticipated.

Parking Facilities

Removal of Mature Trees and Landscaping. The parking facilities would involve the upgrading of the existing two lots, which may include the removal of some existing landscaping. However, no mature trees would be removed. In addition, the facilities would also be heavily landscaped as part of the project, significantly improving the visual appearance of the lots. The addition of this landscaping would result in a beneficial impact of the parking facilities.

Obstruction of Sensitive Views. The parking facilities would not result in the installation of any physical structures that would obstruct views of the surrounding Santa Monica Mountains, the ocean, or any other sensitive view in the Corridor. Therefore, no impacts are anticipated.

Loss of Privacy. The parking facilities are existing parking lots and a change of land use is not being introduced. The facilities would still have the potential to cause a loss of privacy to surrounding residential properties given that additional parking spaces would be available for bus patrons and there would additional opportunity for residents to experience a loss of privacy. Implementation of the mitigation identified below would reduce this impact to less than significant.

Light and Glare. The parking facilities would involve the introduction of new sources of light and glare with the addition of security lighting. These new sources have the potential to create a nuisance to surrounding residential properties. This potential impact would be reduced to less than significant with implementation of the mitigation identified below.

3.5.4 Mitigation

Mitigation Measure 3.5-1 All lighting in community parking facilities shall utilize Best Available Technology to reduce spillover to adjacent land uses. In addition, all lighting in community parking lots shall be directed away from adjacent residences,

landscaping, or fences, and other measures shall be provided to shield adjacent residences from light and glare produced by light standards and vehicle headlights.

Mitigation Measure 3.5-2 Screening shall be provided at community parking facilities to reduce potential privacy impacts on adjacent residential properties.

3.5.5 Cumulative Impacts

The 1998 Regional Transportation Plan (RTP) Draft Master EIR (Southern California Association of Governments [SCAG] 1997), which is hereby incorporated by reference, provides the cumulative context for analysis of the Mid-City/Westside Transit Corridor Project. The 1998 RTP Draft Master EIR provides a programmatic analysis of visual quality impacts resulting from implementation of all projects contemplated in the RTP (SCAG 1998), including the Mid-City/Westside Transit Corridor project. It also provides the basis for this cumulative impact analysis.

Cumulative visual quality impacts could result from implementation of highway, roadway, and transit projects. Projects contemplated in the RTP that do not require the construction of new facilities (e.g., optimization of the existing transportation system) could have some direct physical effects on visual quality, such as an increase in service frequency, which could increase the number of buses or rail vehicles on existing routes. Projects that require construction of new or expanded facilities (e.g., new freeways or expanded roadways or additional parking facilities) would have the greatest potential to result in adverse visual quality impacts. Projects envisioned in the RTP that would be built within existing rights-of-way would modify the existing visual character along the route, through the removal of existing physical structures, landscaping and street trees, introduction of new physical elements (including station stops, access points, lighting and rail stations or bus stops), obstruction or modification of scenic views, and loss of privacy where the new transportation projects provide views into residential structures or properties.

To the extent that new highways, roads, rail service, or transit projects occur in areas that are not currently urbanized, this would result in the greatest potential for adverse visual quality impacts.

In some locations, effective mitigation of visual quality impacts would either require retention of existing visual features (e.g., landscaped medians along designated scenic highways) or modification of transit projects (e.g., elimination of elevated route segments), which would either result in secondary environmental effects or may be considered infeasible. Thus, to the extent to that adverse impacts of the projects contemplated in the RTP cannot be mitigated, the cumulative visual quality impacts would remain significant and unavoidable.

3.6 GEOLOGY, SOILS, AND SEISMICITY

3.6.1 Introduction

This section discusses the relative geotechnical implications of the proposed project alternatives under consideration.

3.6.2 Affected Environment

■ Active and Potentially Active Faults

The Los Angeles Basin is an area known to be seismically active, and there are a number of active and potentially active faults within the Study Area. Active faults are those that are believed to have moved within the last 11,000 years, while potentially active faults are believed to have moved between 11,000 and 2 million years ago. The faults of particular concern are the Hollywood/Santa Monica Fault and the Newport/Inglewood Fault. Figure 3.6-1 illustrates the generalized fault zones within the corridor area.

■ Alquist-Priolo Fault Hazard Zones

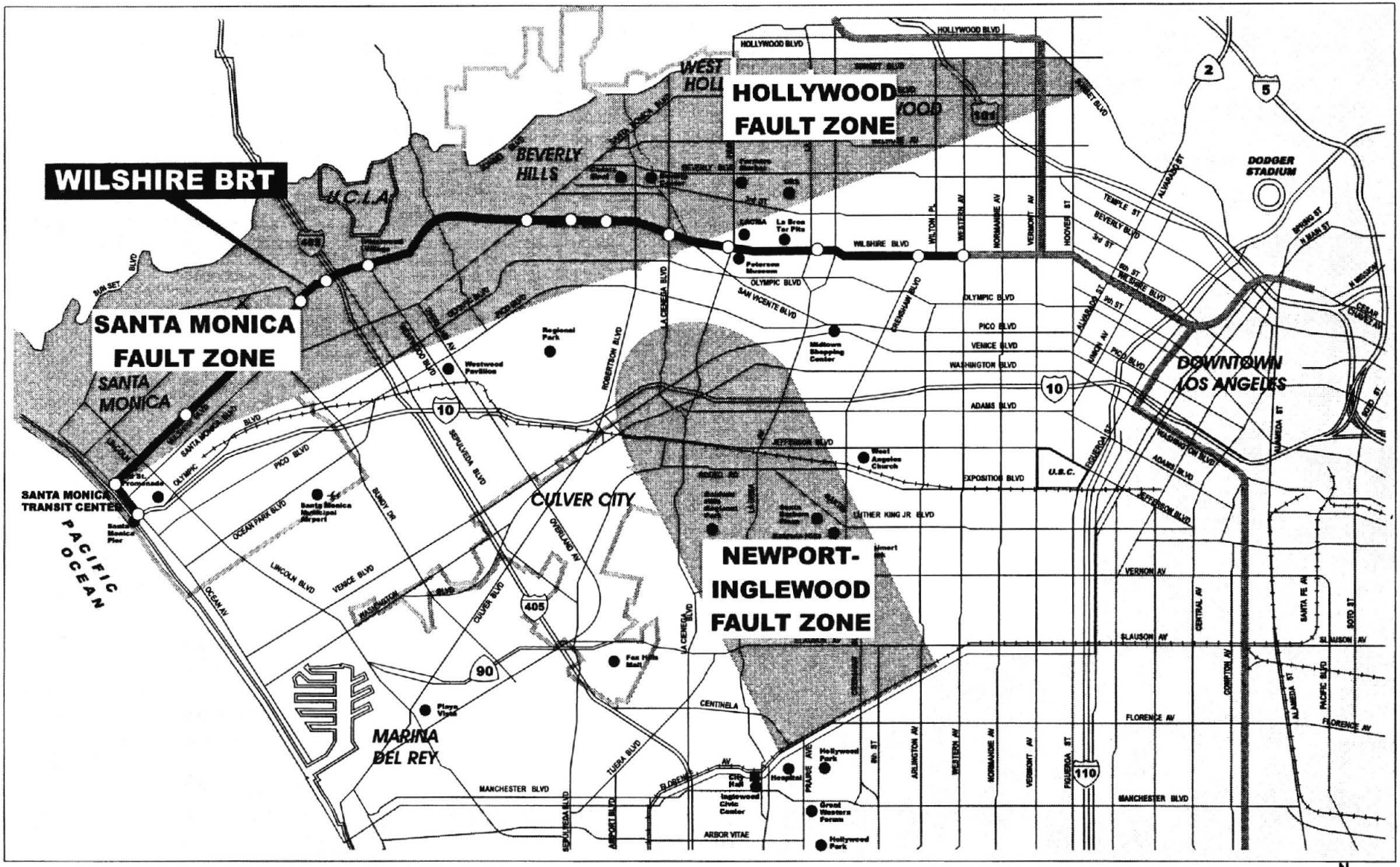
A review of Alquist-Priolo Fault Hazard maps from the California Department of Conservation (Division of Mines and Geology) indicates that there is one fault hazard zone designated within the corridor as shown in Figure 3.6-2. This zone is located primarily south/southeast of the La Cienega Boulevard and Washington Boulevard intersection and south of the Wilshire BRT corridor. The Alquist-Priolo Earthquake Fault Zoning Act's main purpose is to prevent the construction of buildings used for human occupancy on the surface trace of active faults.

■ Liquefaction Potential and Other Soil Considerations

In addition to faults, the Study Area is also characterized by soils that are subject to liquefaction. Liquefaction takes places during a seismic event when soils combined with a high water table are unable to support the load bearing weight from structures or foundations. Figure 3.6-3 illustrates that about two-thirds of the Study Area is located within areas of potential liquefaction. Soils classified by the U.S. Soil Conservation Service are generally designated as alluvial deposits from the Los Angeles River, (which in the past ran in a northeast/southwest direction through the southern part of the corridor area). Major soil associations found in the corridor area include Chino Silt Loam, Hanford Clay Loam, Hanford Fine Sandy Loam, Montezuma Clay Adobe, Ramona Clay Loam, Ramona Loam, Ramona Sandy Loam, Yolo Clay Loam, and Yolo Loam.

■ Other Subsurface Conditions

The City of Los Angeles has designated a Methane Hazard Zone within the Study Area (Figure 3.6-4). Previous environmental studies have disclosed that there are sometimes high lethal levels of hydrogen sulfide captured



LEGEND:

Within 2km of known seismic sources

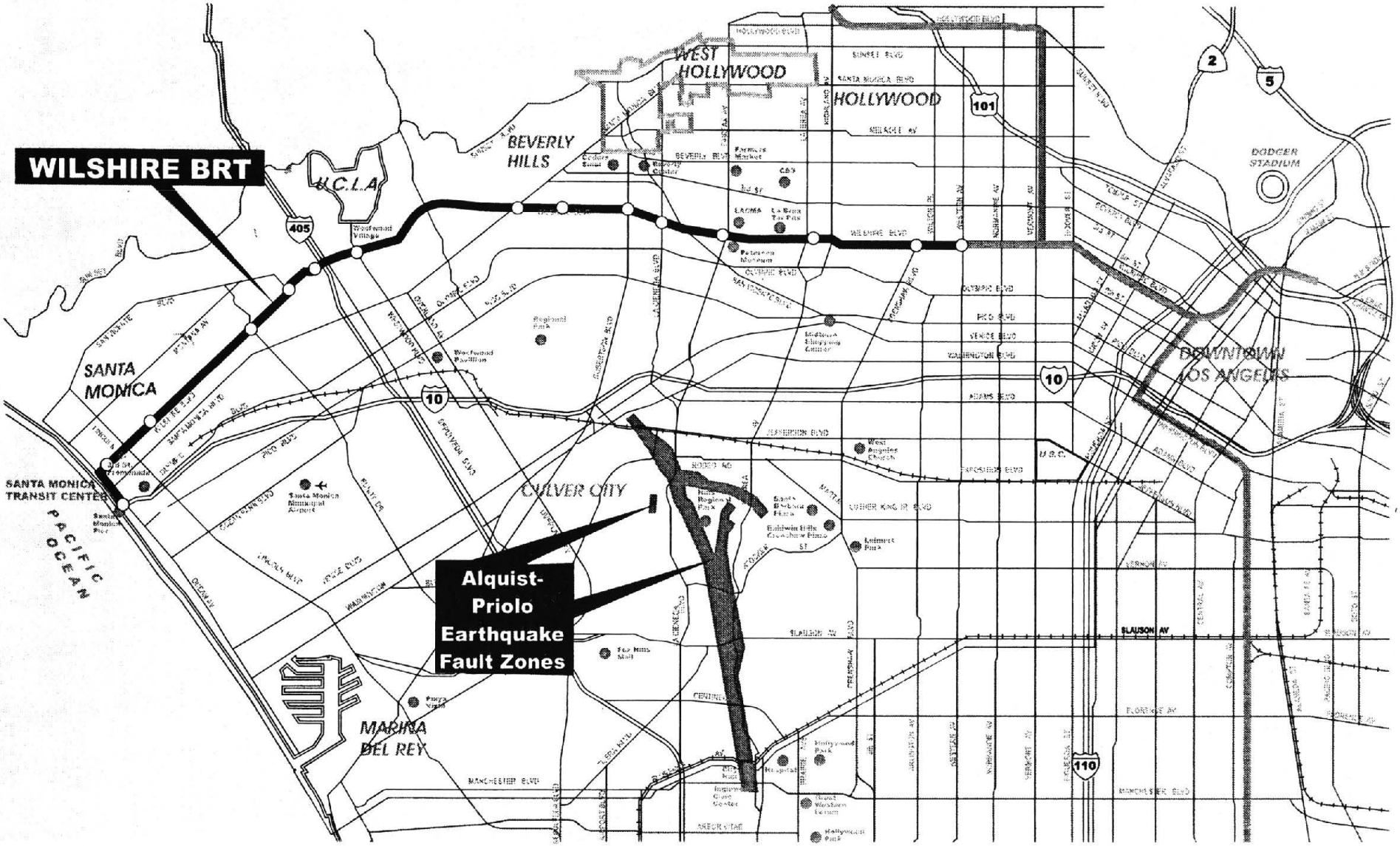
SOURCE: California Department of Conservation, Division of Mines & Geology

Mid-City/Westside Transit Corridor

LOS ANGELES COUNTY METROPOLITAN TRANSPORTATION AUTHORITY

FIGURE 3.6-1

ACTIVE FAULT ZONES



LEGEND:

Alquist-Priolo Earthquake Fault Zones

SOURCE: City of Los Angeles

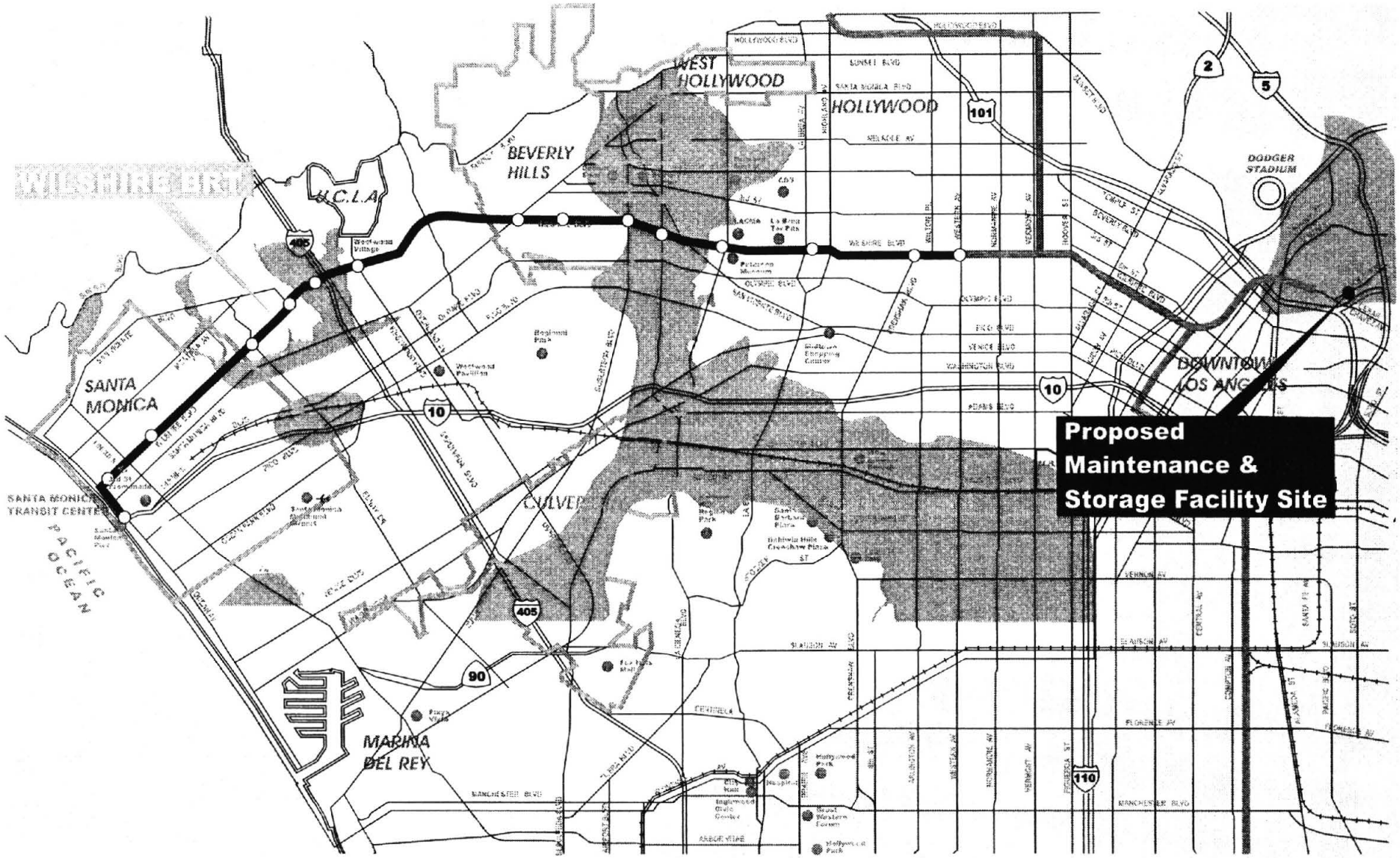
N

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FIGURE 3.6-2

ALQUIST-PRIOLO EARTHQUAKE FAULT ZONES



LEGEND:

Potential Liquefaction Areas

SOURCE: City of Los Angeles

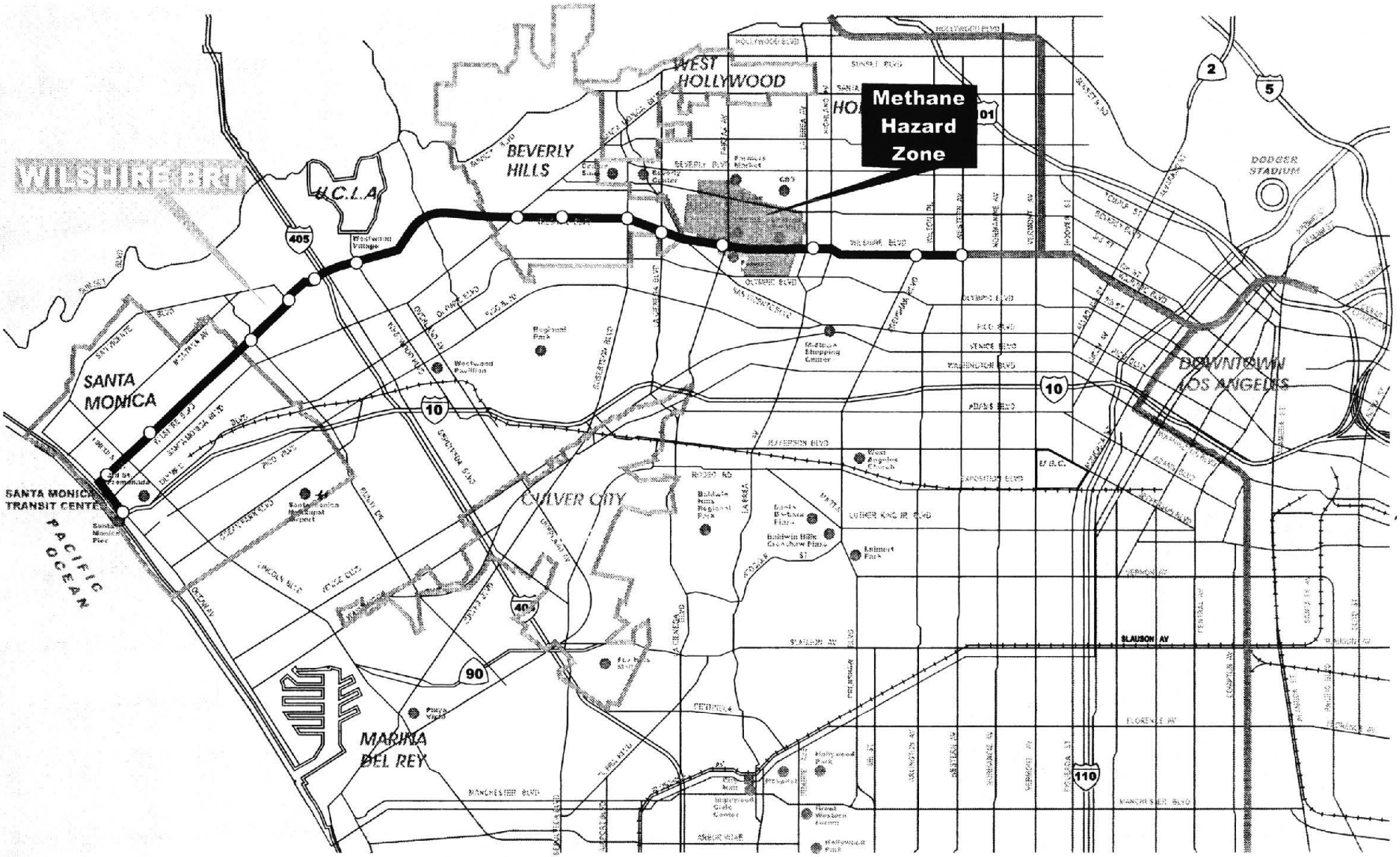
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FIGURE 3.6-3

POTENTIAL LIQUEFACTION AREAS



LEGEND:

Methane Hazard Zone

SOURCE: City of Los Angeles

N

Mid-City/Westside Transit Corridor

LOS ANGELES COUNTY METROPOLITAN TRANSPORTATION AUTHORITY

FIGURE 3.6-4

METHANE HAZARD ZONE

within the San Pedro geologic formation about 40 feet below the surface. The primary area of the hydrogen sulfide appears to be centered near the Pico Boulevard and San Vicente Boulevard intersection.

3.6.3 Impact Assessment and Mitigation Measures

Standards of Significance

A significant adverse effect would occur if one or more of the following conditions were met:

- The proposed project alternatives would expose people or structures to adverse effects (including the risk of loss, injury, or death) involving rupture of known earthquake faults, strong seismic ground shaking, landslides or liquefaction
- The proposed project alternatives would expose people to adverse effects of subsurface toxic or explosive gases

Impacts

No Action Alternative (Baseline)

The No Action Alternative would not involve the construction of subsurface or aerial transit structures, and no exposure to known geologic hazards would be expected. No impacts are anticipated.

Transportation System Management (TSM) Alternative

The TSM Alternative would be similar to the No Action Alternative. No construction of subsurface or aerial structures is anticipated, and no significant geotechnical-related impacts are anticipated.

Locally Preferred Alternative: Wilshire BRT

Although this alternative would traverse areas identified as hazardous, including the Santa Monica and Hollywood Fault zones, methane gas, and liquefaction, this alternative would not require the construction of major subsurface or aerial structures. No impacts are anticipated.

Maintenance and Storage Facilities

The maintenance facility site is located in an area subject to liquefaction. The site is not located in a Fault Hazard Zone. Proposed for the site is a two-level parking facility. Without structure design mitigation, impacts would be considered significant for this site.

The following measure would reduce geological impacts to a less-than-significant level:

Mitigation Measure 3.6-1 Prior to the final approval of the maintenance yard site, a geotechnical study shall be prepared by a Registered Geologist indicating the design requirements for the

site. Identified requirements shall be incorporated into the specifications for the maintenance yard project.

3.6.4 Parking Facilities

Development of the parking facilities would not involve the construction of subsurface or aerial transit structures, and no exposure to known geologic hazards would be expected. No impacts are anticipated.

3.6.5 Cumulative Impacts

Geotechnical and seismic constraint impacts are site-specific. The alternatives under consideration would not affect construction and excavation in limited areas and would not likely combine with other commercial or non-commercial building construction to create a combined impact that would adversely affect the geological integrity or slope stability of adjacent areas.

3.7 SAFETY AND SECURITY

3.7.1 Introduction

This section discusses any potentially significant safety (related to pedestrians) and security (related to the transit system) impacts that could occur due to the proposed project alternatives.

3.7.2 Affected Environment

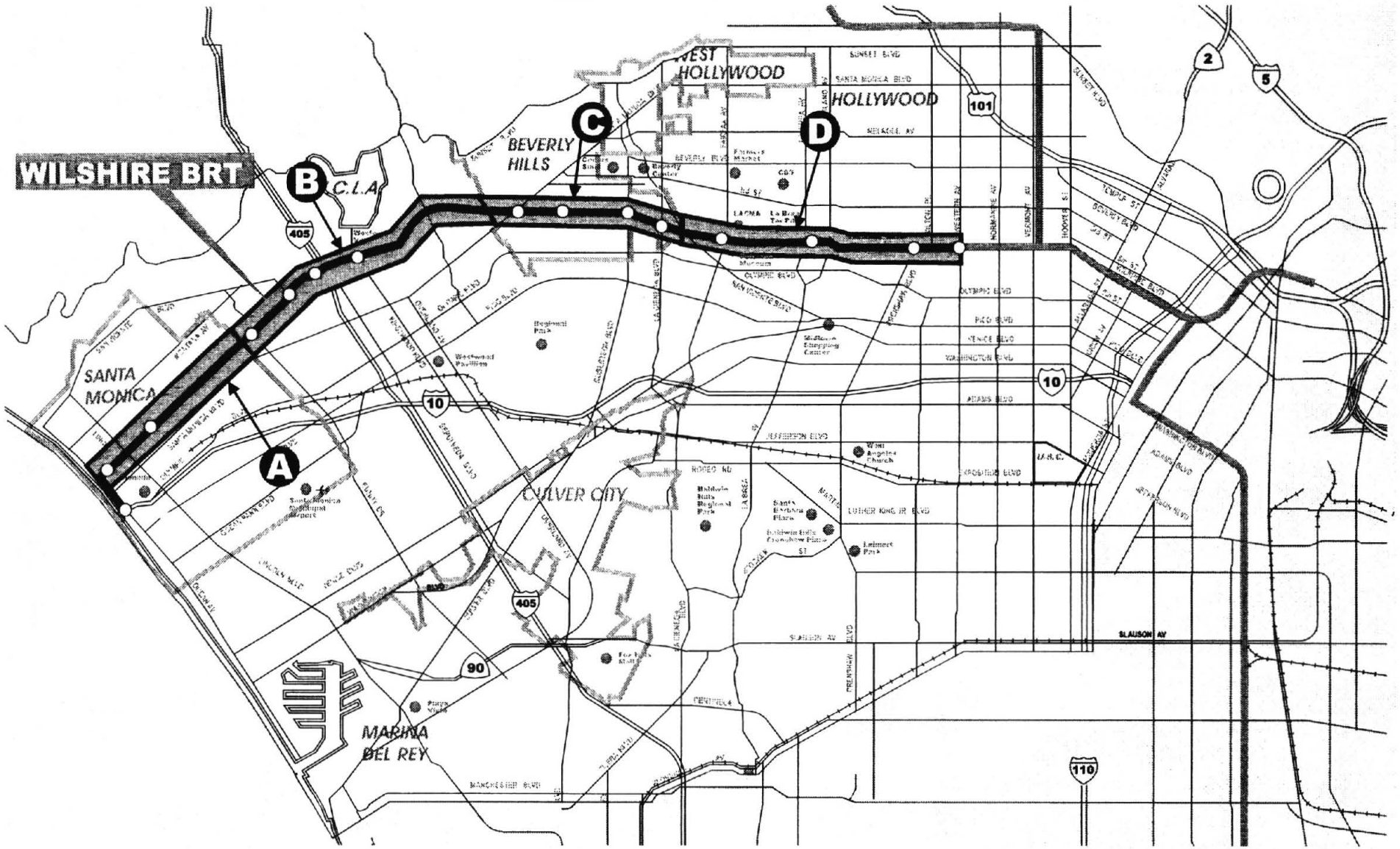
Wilshire Boulevard is a major arterial located in a dense urban environment with high volumes of pedestrian and motorist activity. Pedestrian activity is particularly high in the Wilshire Center area, Miracle Mile, downtown Beverly Hills, Westwood, West Los Angeles, and in Santa Monica. Between Western Avenue and Second Street in downtown Santa Monica, ninety signalized intersections are present. In addition, forty legal pedestrian crossings that are not equipped with traffic signals exist along this corridor. A majority of the unsignalized crosswalks are unmarked. Pedestrians can legally cross a street at any signalized or unsignalized crosswalk, or at an unmarked crosswalk at an intersection.

Pedestrian activity is generated through the parks, schools, museums, and other activity centers located within one-quarter mile of the Wilshire Corridor. These include parks (eight), public elementary schools (seven), public middle schools (two), public high schools (two), private schools (six), hospitals and health centers (three), museums (four), fire stations (eight), cemeteries (two), libraries (one). Other pedestrian activity along Wilshire Boulevard is generated from people traveling to and from local businesses or residences.

The Study Area is served by police departments in the Cities of Los Angeles, Beverly Hills, and Santa Monica (refer to Figure 3.7-1). Table 3.7-1 illustrates the relative Part I crime rates and response times within the corridor. Part I Crimes include homicide, rape, aggravated assault, robbery, burglary, larceny, and vehicle theft. The data broadly suggest that the crime rate may be slightly higher in the southern portion of the transit corridor.

Table 3.7-1 Part I Crime Rate and Response Time (Year 1999)

	Part I Offenses	*Crime Rate (Part I Offenses per 1000 Population)*	*Average Response Time (minutes)*
Santa Monica Police Department	4,884	50.6	4.92
Beverly Hills Police Department	1,549	46.0	3.5
Los Angeles Police Department			
West Los Angeles	6,731	22.4	10.4
Wilshire	12,453	40.6	9.3
Newton	8,257	60.6	9.1
Rampart	9,677	52.0	9.4



LEGEND: **A** Santa Monica Police Dept.
B LAPD West LA Community Division
C Beverly Hills Police Dept.
D LAPD Wilshire Community Division

N

SOURCE: Terry A. Hayes Associates LLC

Mid-City/Westside Transit Corridor

LOS ANGELES COUNTY METROPOLITAN TRANSPORTATION AUTHORITY

FIGURE 3.7-1

POLICE SERVICE AREAS

In addition to crimes reported for the general population by the local police, statistics are also maintained for MTA operations. According to the Transit Services Bureau operated by the Los Angeles County Sheriff's Department, 4,403 incidents were reported for the 1999 year (1,281 for Metrolink and 2,913 for MTA). Of the total reported, 391 of the crimes (8 percent) were Part I Crimes. Statistics as reported by the Los Angeles Police Department for transit crimes indicate 2,208 offenses were reported for 1999.

The MTA is also responsible for implementing its own *System Safety Program Plan* to maintain and improve the safety of commuter operations, reduce the costs associated with accidents, and comply with state regulations. These safety measures were established to provide worker and passenger safety, crime prevention, adequate emergency response, and emergency procedures following natural disasters. Furthermore, the MTA currently provides police surveillance, non-uniformed police inspectors on transit and at major transit nodes, closed circuit television, and an emergency radio system to provide quick response to emergencies.

Over the last 10 years the MTA has established several programs to enhance the safety of passengers, employees and the community. These programs include

- Video equipment has been installed on buses, permitting live video to be observed, to increase the safety of the passengers and employees
- Direct communication services on the buses with the Los Angeles Police Department or the Los Angeles Sheriffs Department Transit Dispatch/Emergency Response Center

The Transit Safety Awareness Program communicates safety information to motorists and pedestrians in an attempt to change unsafe behaviors. Safety information is communicated through transit user aids such as timetables and bus stop information signs and via the Internet.

3.7.3 Impact Assessment and Mitigation Measures

■ Standards of Significance

Project effects on safety and security would normally be considered significant under CEQA if they

- Cause or create the potential for substantial adverse safety conditions, particularly concerning conflicts between pedestrians and vehicles
- Cause or create the potential for substantial adverse security conditions, particularly concerning station areas
- Substantially interfere with the implementation of an emergency evacuation plan

■ Impacts

No Action Alternative (Baseline)

The No Action Alternative would involve increases to the bus operations fleet and minor transit service restructuring. Changes to pedestrian crossings are not anticipated. Travel patterns for pedestrians, to/from schools, to/from businesses, would not be altered. Safety at crossings near parks along the Wilshire alignment

would remain similar to current conditions. Therefore, it is anticipated that, while pedestrian/vehicle conflicts may still occur, the No Action Alternative would not increase the risk of these conflicts. Therefore, impacts would be less than significant.

Because there are no significant changes to bus service or operating characteristics, no impacts on security are anticipated other than potential crime increases due to increased ridership. Crimes on the transit system would continue to be addressed through local and MTA policing services, as well as the safety programs established by MTA. Impacts would be less than significant.

This alternative would not alter or create the need to alter emergency evacuation plans. Therefore, no impacts are anticipated.

Transportation System Management (TSM) Alternative

The TSM Alternative would involve operational and route restructuring improvements, along with extensions of the MTA Rapid Bus service and corridors. Changes to pedestrian crossings are not anticipated. Travel patterns for pedestrians, to/from schools, to/from businesses, would not be altered. Safety at crossings near parks along the Wilshire alignment would remain similar to current conditions. Therefore, it is anticipated that, while pedestrian/vehicle conflicts may still occur, the TSM Alternative would not increase the risk of these conflicts. Therefore, impacts would be less than significant.

Because there are no significant changes to bus service or operating characteristics, no impacts on security are anticipated other than potential crime increases due to increased ridership. Crimes on the transit system would continue to be addressed through local and MTA policing services, as well as the safety programs established by MTA. Impacts would be less than significant.

This alternative would not alter or create the need to alter emergency evacuation plans. Therefore, no impacts are anticipated.

Locally Preferred Alternative: Wilshire BRT

A protected right turn phase (a right turn arrow) may be added to selected intersections to clear right turning vehicles that are queued in front of a bus. This additional phase would require pedestrians traveling along Wilshire Boulevard to wait for the protected right turn phase to be completed prior to entering the intersection. Similar to the existing operation at the selected intersections, pedestrians will be controlled by pedestrian signals ("Walk"/"Don't Walk" signals) at the crosswalks. Installation of appropriate signage (see mitigation measure below) directing pedestrians to use caution would reduce any potential impact to less than significant.

The Wilshire BRT route would use a highly developed urbanized corridor that exhibits an unusually high level of pedestrian activity. It is unlikely that stations located on adjacent sidewalks would induce or create an unsecure environment. However, there remains the potential for increased activity, given that the number of transit users would increase, at station areas. Installation of security lighting would reduce any potential impacts to less than significant.

This alternative would not alter or create the need to alter emergency evacuation plans. Therefore, no impacts are anticipated.

Maintenance Yard

The proposed maintenance facility would be located in an industrial area with minimal pedestrian activity and is not adjacent to any commercial facilities or residential properties. Therefore, there are no safety issues associated with the construction of this facility. No impacts would occur.

The facility will be a secure facility closed to public access. It is not anticipated that this facility would have an effect on security. Less-than-significant impacts would occur.

Parking Facilities

The creation of these lots may raise security concerns, particularly in terms of safe passage and pathways to the lots. However, safety features that are planned for the parking lots would improve upon existing conditions. Less-than-significant impacts would occur.

3.7.4 Mitigation

Mitigation Measure 3.7-1 If the peak period transit lane were implemented, new signage shall be installed at signalized pedestrian crossings where the right turn movement for motorists is protected, advising pedestrians to wait for the "walk" signal.

Mitigation Measure 3.7-2 All station areas shall be lighted to provide a safe environment and visibility of the station area from adjacent land uses.

Mitigation Measure 3.7-3 If a special green light phase for the bus is implemented, the LACMTA shall sponsor a pedestrian safety education program, explaining acceptable methods to cross the intersections using BRT signal prioritization.

3.7.5 Cumulative Impacts

The safety and security impacts of the alternatives considered are not expected to be cumulatively considerable. Overall, impacts would be less than significant.

3.8 CONSTRUCTION IMPACTS

The impacts associated with the construction of the peak hour lane, the parking facilities, and the maintenance facility are described in this section. These impacts are presented separately as the issues associated with construction are different from those of operation of the lane and the other facilities. Many of the environmental impacts associated with the proposed project would occur only during the time of the construction, and would be temporary and short-term. A Construction Mitigation Plan has been developed to reduce the impacts associated with the construction.

The construction methods proposed for the project are presented below, along with the standards of significance used to determine if an impact would occur, and a discussion of the impacts associated with the lane, parking facilities, and maintenance facility.

It should be noted that the majority of the construction activities and the impacts associated with them would only occur along a 4-mile segment of Wilshire Boulevard, between Western Avenue and San Vicente Boulevard. Lane reconstruction and installation of bus pads would only occur in areas outside of Beverly Hills and Santa Monica, where this improvement has already been implemented. Construction activities would also occur at parking sites at Crenshaw and La Brea and at Downtown Bus Division #10. These construction activities would be primarily off-street in controlled construction sites. Stations would be installed along the entire length of the project.

3.8.1 Construction Methods

■ Bus Lane Reconstruction

The intent of the curb lane reconstruction between Western Avenue and San Vicente Boulevard is to provide a level travel surface for the buses, and in turn a more comfortable ride for bus passengers. The area to be reconstructed would be at the intersections and at mid-blocks between the intersections.

Reconstruction of the curb lane would employ conventional construction methods, techniques, and equipment. All construction work for development of the transit system would conform to accepted industry specifications and standards.

Construction of the curb lane and bus pads consist of

- Reconstruction of travel lanes on Wilshire Boulevard (between Western Avenue and San Vicente Boulevard)
- Installation of bus pads at station locations (from Western Avenue to San Vicente Boulevard)
- Installation of station shelters and station landscaping along the entire Wilshire BRT route (from Western Boulevard to Ocean Avenue)
- Installation of bus pads at Metro Rapid stops in West Los Angeles between Westwood Boulevard and Bundy
- Installation of additional infrastructure for elements such as communications and signaling

The construction process for the curb lane reconstruction would occur in three phases. Under each phase, different groups of three to four street block segments would be affected. Each phase would last approximately 16 weeks, for a total construction period of 48 weeks. Construction within each block segment consists of intersection and mid-block reconstruction. Within each block segment, construction would follow a sequence of steps or stages where different portions of the street would be affected such that traffic, parking, and sidewalks can be maintained in other areas during construction. Upon completion of a stage, traffic circulation patterns would be shifted so that construction for the next stage can begin. Reconstruction of intersections would occur first. Once reconstruction of the intersections is completed, reconstruction of travel lanes in mid-blocks would occur. Mid-block construction would occur on the north side of Wilshire Boulevard, followed by the south side. During reconstruction of travel lanes, at least one travel lane, in the direction with construction activities, would be open on Wilshire Boulevard. All travel lanes going the opposite direction, where no construction activities are occurring, would be open.

Reconstruction of travel lanes would consist of

- Removal of existing pavement
- Excavation
- Relocation of utilities
- Building curbs, gutters, and sidewalks
- Construction of bus pads (approximately eight-inch concrete pads) at station locations
- Asphalt/concrete (AC) paving
- Laying final paving course
- Reinstallation of signal conduits
- Cutting signal loops
- Pavement markings and signing

Equipment that would be used during construction of travel lanes includes graders, bulldozers, cement mixers, flat bed trucks, and dump trucks to haul dirt and spoil materials. Equipment used on the project would be fitted with mufflers and spark arresters.

Construction of the project would follow all applicable local, State, and federal laws for building and safety. Standard construction methods would be used for traffic, noise, vibration, and dust control, consistent with all applicable laws. Construction activities would occur between 8:00 A.M. and 4:00 P.M., except in special circumstances when an expedited completion would be in the best interest of the community.

Station Installation

During roadway reconstruction, fifteen curbside stations would be installed. These stations would be constructed from standard building materials, such as brick, concrete, steel, and heavy plastic, which are durable and resistant to vandalism. The stations for the BRT system would be approximately 60 feet long and 6 to 8 feet wide.

■ Maintenance and Storage Facilities

The proposed project consists of expanding the existing Division 10 bus maintenance facility, which is located at 742 North Mission Road in the City of Los Angeles. The existing site extends from the Burlington Northern Santa Fe (BNSF) railroad tracks to the Santa Ana Freeway (I-5) right-of-way. The existing site is approximately 20.2 acres. The site will be expanded to the west through the addition of the parcels that are currently used for auto-related repair and salvage businesses. A triangular-shaped area south of the BNSF tracks, which is bounded by Mission Road, Metrolink railroad tracks, San Bernardino Freeway, and Gallardo Street, will also be part of the expanded site. Construction of the proposed bus maintenance facility consists of constructing a new maintenance building, a new tire shop, a new transportation building, new fueling lanes/CNG farm, and a new fare retrieval area. A deck bridge would span the railroad tracks and provide access to the two parts of the proposed site. The existing tire shop would be relocated to an area under the San Bernardino Freeway structure. Approximately 40,950 cubic yards of soil would be excavated on the site. Construction would last for approximately two years.

■ Parking Facilities

Parking would be provided in two locations along the Wilshire BRT alignment: the Wilshire Boulevard/La Brea Avenue and Wilshire Boulevard/Crenshaw Boulevard intersections. Construction of the two parking facilities would involve paving and striping of the parking area; reconstruction of concrete curbs, driveways, and sidewalks as necessary; and landscaping.

Equipment used for construction of the parking facilities would include diamond saws, pavement breakers, jackhammers, compressors, concrete pumping equipment, paving machines, dump trucks, and front-end loaders.

3.8.2 Standards of Significance

CEQA-related criteria for a significant construction impact would include

- *Traffic*—Increase in traffic delays/Reduction of daytime travel speeds/Reduction of roadway capacity
- *On-Street Parking*—Loss of on-street parking
- *Pedestrian Movement*—Reduced ability of pedestrians to move along the sidewalks
- *Business Access*—Reduced pedestrian access to businesses
- *Public Safety*—Degradation of public safety
- *Street/Sidewalk Maintenance*—Reduction in maintenance services
- *Noise*—Five decibel increases or greater in ambient noise levels
- *Drainage/Erosion*—Lack of control of drainage and erosion
- *Air Quality*—Increases in air pollutant emissions that exceed SCAQMD construction emissions criteria
- *Hazardous Materials*—Improper disposal of discovered hazardous materials
- *Paleontological and Archeological Resources*—Disturbance of resources without proper recovery

3.8.3 Construction Impacts

No Action Alternative (Baseline)

Under the No Action Alternative, only improvements to the bus fleet would be made and no construction would occur. Therefore, no impacts are anticipated.

Transportation System Management (TSM) Alternative

Under the TSM Alternative, only enhancements would be made to the existing bus system and no construction would occur. Therefore, no impacts are anticipated.

Curb Lane Reconstruction (Western to San Vicente)

Traffic. Reconstruction of the curb lane on Wilshire Boulevard between Western and San Vicente Boulevard would temporarily interfere with the normal flow of traffic, causing some lanes to be closed to vehicles for various durations. Impacts would generally last approximately 16 weeks. Reconstruction of traffic lanes, as well as traffic generated by construction workers and trucks hauling excavated materials or construction supplies, would reduce the capacity of, reduce daytime travel speeds along, and cause delays to traffic movement along Wilshire Boulevard. Lane closures and detours are not anticipated on Wilshire Boulevard between San Vicente Boulevard and Ocean Avenue since no roadway reconstruction would occur. Within this area, construction activities involve developing station shelters and landscaping. Lane closures would not be required for these activities. Construction of new concrete bus pads at stations between Westwood and Bundy would be highly localized and of short duration. To minimize any disruptions to traffic, mitigation of potential traffic impacts, and traffic management and traffic control measures would be implemented with the coordination and involvement of the cities along the project route. These measures are listed in the Wilshire Boulevard BRT Construction Mitigation Plan. However, it is anticipated that even with implementation of the mitigation measures, a significant impact would result.

On-Street Parking. Accessibility to businesses along Wilshire Boulevard would be interrupted during construction activities since parking would be limited along some stages of work on Wilshire Boulevard. During mid-block reconstruction, parking would not be allowed on one side of the street. However, vehicular access to businesses is still accessible through cross streets as well as through the rear entrances of the affected businesses, where available. Prior to construction, public affairs and construction staff from the MTA would contact and interview individual businesses, allowing for knowledge and understanding of how these businesses carry out their work. This information would be used by the MTA to develop Worksite Traffic Control plans, identify alternative access routes, and make efforts during construction to maintain critical business activities. This process would mitigate impacts to less-than-significant levels.

Parking for contractor and subcontractor employees would also potentially limit the amount of on-street parking in the construction area. The Wilshire Boulevard BRT Construction Mitigation Plan provides mitigation measures such that effects of contractor and subcontractor parking would be reduced to less-than-significant levels.

Pedestrian Access. Pedestrian access along the sidewalks, to businesses or other establishments along Wilshire Boulevard would be maintained during construction. In some instances, at station areas, portions of the sidewalks may be closed temporarily for station construction/installation. The Wilshire Boulevard BRT Construction Mitigation Plan provides mitigation measures to ensure safe and efficient movement of pedestrians. Mitigation measures would reduce impacts to less-than-significant levels.

Business Access. Although access to businesses would be maintained throughout the construction period, accessibility to businesses along Wilshire Boulevard would be difficult during construction activities. Temporary special signage would be used to inform customers that merchants and other businesses are open. Signage could also provide special access directions if warranted. The signage would also include special lane closure information in advance of a future temporary closure. The MTA Wilshire BRT Construction Mitigation plan provides measures to implement the temporary special signage. Mitigation measures would reduce impacts to less-than-significant levels.

Public Safety. Construction activities would potentially affect public safety since the construction area is located in a dense urban environment with high volumes of motorist activity. Construction activities would necessitate removal and replacement of existing lighting facilities, particularly during station construction. Temporary street lighting would be necessary to provide for safety and security of pedestrians and to allow motor vehicles to pass safely through the work zone. However, the need for temporary street lighting is expected to be very limited since lighting at stations would be the only areas that are affected. The Wilshire Boulevard BRT Construction Mitigation Plan provides measures to mitigate construction impacts on-street lighting. Mitigation measures would reduce impacts to less-than-significant levels.

Street/Sidewalk Maintenance. During the reconstruction of travel lanes, the City of Los Angeles normal street and sidewalk maintenance activities would not be performed within the project limits where the Contractor has taken possession for construction staging purposes. The Contractor's operations would impact the condition of streets within and surrounding the work sites beyond what occurs in a normal day. As such, the responsibility for this maintenance becomes transferred to the Contractor. Additionally, the Contractor would be required to maintain the construction area in accordance with specific program/schedule defined in the contract in order to assure that the project area is maintained in a safe, clean, and passable condition throughout construction. The Contractor would be responsible for these functions in the construction area in accordance to the mitigation measures listed in the Wilshire Boulevard BRT Construction Mitigation Plan. These mitigation measures would reduce impacts to less-than-significant levels.

Noise. Construction activities near residential and school properties may produce noise that may be disruptive. A limited number of residential uses are located along Wilshire Boulevard. Of these residential uses, only a few have an unobstructed view of Wilshire Boulevard. These residential uses are primarily located within the Park Mile/Hancock Park area (from Wilton Place to Rimpau Boulevard) and Miracle Mile (from La Brea Avenue to San Vicente Boulevard). One school (Burroughs Middle School) adjoins Wilshire Boulevard. The nearest classroom building to this school is approximately 200 feet from Wilshire Boulevard. In addition to the school and residential uses that are located along Wilshire Boulevard, two schools and several residential uses are located

along streets that are perpendicular from Wilshire Boulevard. Areas where these land uses would be visible from Wilshire Boulevard would also be affected by construction noise. However, areas that would be the most affected by construction noise would be the school and residential uses that have an unobstructed view of Wilshire Boulevard.

Principal noise sources during the construction phase of the proposed project would include heavy trucks, grading equipment, and diesel engines used to power other construction equipment. When the noise from idling trucks is combined with other intermittent construction noises, such as graders, the total sound level at the site could approach peaks of 90 dBA (at a reference distance of 50 feet). Ambient noise level along Wilshire Boulevard during the day is generally between approximately 65 to 70 dBA.

Assuming that the frequency of construction noise is approximately 40 percent of the workday (consistent with the United States Environmental Protection Agency—EPA) and that the sound wave propagation path is unobstructed and over a hard surface, it is anticipated that a noticeable change (5 dBA or greater) in the ambient noise level could occur at distances up to 250 feet from the construction noise source during the daytime. Construction generated noise would be subject to the City of Los Angeles noise ordinance and the provisions of all applicable laws and regulations. Compliance with the City noise ordinance, as well as implementation of mitigation measures in the Wilshire Boulevard BRT Construction Mitigation Plan, would reduce construction noise impacts during construction to less-than-significant levels.

Construction noise would have more affect on ambient noise levels at night than during the day since ambient sound levels are lower. Although nighttime construction would not have an impact on schools, a significant impact may occur at residential uses since most of the residences would be occupied at night. Although nighttime construction is not anticipated for the proposed project, it is anticipated that a significant impact would occur should there be construction at night.

Drainage and Erosion Control. Roadway reconstruction would likely impact water quality primarily due to runoff from exposed excavated surfaces. Drainage and erosion control would be necessary to limit impacts to water quality in storm sewers. These measures would meet the requirements of the NPDES permit secured by the City of Los Angeles and would reduce impacts to less-than-significant levels.

Air Quality. Construction of the Wilshire BRT would generate pollutant emissions from the following construction activities: (1) grading and excavation, (2) mobile emissions related to construction worker travel to and from project sites, (3) mobile emissions related to the delivery and hauling of construction supplies and debris to and from project sites, and (4) stationary emissions related to fuel consumption by on-site construction equipment. Table 3.8-1 shows the estimated worst-case daily emissions for the construction of the Wilshire BRT. Daily emissions were derived using the applicable emission factors and formulas found in the *SCAQMD CEQA Handbook*, Appendix to Chapter 9.

Table 3.8-1 Daily Construction Emissions (pounds per day) Wilshire BRT

Construction Phase	CO	ROG	NO_X	SO_X	$P.M._{10}$
Site Preparation	36	5	15	1	311
Construction of Travel Lanes and Stations	29	4	4	1	1
Maximum	*36*	*5*	*15*	*1*	*311*
SCAQMD Threshold	**550**	**75**	**100**	**150**	**150**
Potential Threshold Violation?	No	No	No	No	Yes

Source: Terry A. Hayes Associates, 2002

As shown above, four of the five criteria pollutants are not expected to exceed the SCAQMD significance thresholds. The four criteria pollutants that are not expected to exceed the SCAQMD thresholds are: CO, ROG, NO_X, and SO_X. PM_{10} is expected to exceed the SCAQMD significance threshold of 150 pounds per day (ppd). Increasing on-site soil moisture content to 10 percent due to site watering would reduce PM_{10} emissions to approximately 116 ppd during site preparation.[1] With implementation of mitigation measures provided in the MTA Wilshire BRT Construction Mitigation Plan, a less-than-significant impact is anticipated.

The closure of the travel lanes during construction would likely divert traffic to adjacent streets and, thus, affect CO concentrations in the area. These streets would likely experience an increase in CO concentrations due to the increase in traffic and congestion from diverted traffic. Several intersections within the vicinity of Wilshire Boulevard currently experience CO concentrations that exceed the state one- or eight-hour CO standards of 20.0 and 9.0 parts per million (ppm). Thus, the diversion of traffic to nearby roadways would likely exacerbate existing violations of the state one- or eight-hour CO standards. This impact is considered significant.

Hazardous Materials. A review of federal and State regulatory agency lists was conducted to determine if locations within Wilshire Boulevard contained suspected hazardous waste sites.

- *CORTESE:* The California Environmental Protection Agency Office of Environmental Information has compiled a Hazardous Waste and Substances Sites List (Cortese list), which includes sites designated by the State Water Resources Control Board, the Integrated Waste Management Board, and the Department of Toxic Substances Control. The Cortese list was reviewed for any sites located within the routes. Hazardous material locations within the Wilshire Corridor, found on the April 1998 Cortese list, are displayed in Table 3.8-2.

According to the information sited in Table 3.8-2, several sites containing leaking underground storage tanks were identified along the Wilshire route. However, these sites are all outside of the existing Wilshire Boulevard street right-of-way. Construction of the Wilshire BRT Alternative would occur within the existing street right-of-way. Reconstruction of travel lanes on Wilshire Boulevard would not disrupt underground storage tanks or encounter hazardous materials. No significant impacts are anticipated.

[1] A three percent soil moisture content was used to calculate $P.M._{10}$ concentrations without implementation of mitigation measures. Site watering will increase the soil moisture content to approximately 10 percent. Based on the formulas provided in Table 9-9 of the SCAQMD CEQA Air Quality Handbook, Appendix 9 (1993 edition), a soil moisture content of approximately 10 percent will reduce $P.M._{10}$ concentrations to approximately 116 ppd.

Table 3.8-2 Sites on CORTESE List within Wilshire Route

Site	Location	Type of Contamination
804 Wilshire Boulevard	Fujita Corporation, Santa Monica	Leaking Underground Storage Tank
1111 Wilshire Boulevard	Roywood Corporation/Nakano-Kia, Los Angeles	Leaking Underground Storage Tank
2730 Wilshire Boulevard	Kennedy-Wilson International, Santa Monica	Leaking Underground Storage Tank
3675 Wilshire Boulevard	Arco #5355, Los Angeles	Leaking Underground Storage Tank
3855 Wilshire Boulevard	Texaco #Alex Haagen, Los Angeles	Leaking Underground Storage Tank
4180 Wilshire Boulevard	Alright Parking Lot, Los Angeles	Leaking Underground Storage Tank
8567 Wilshire Boulevard	Mobil #11-GWX, Beverly Hills	Leaking Underground Storage Tank
8833 Wilshire Boulevard	BMW of Beverly Hills, Beverly Hills	Leaking Underground Storage Tank
9777 Wilshire Boulevard	Wilshire Triangle Center, Beverly Hills	Leaking Underground Storage Tank
10950 Wilshire Boulevard	Hertz—West Los Angeles	Leaking Underground Storage Tank
11800 Wilshire Boulevard	Chevron #9-7748, Los Angeles	Leaking Underground Storage Tank
12054 Wilshire Boulevard	Mobil #11-LDM, Los Angeles	Leaking Underground Storage Tank

Paleontological and Archeological Resources. During reconstruction of roadways, excavation of roadways would be approximately one foot below the existing surface. The area would not be excavated deep enough such that archeological and/or paleontological resources would be disturbed. Additionally, this area has been previously disturbed from previous roadwork. Thus, construction of the proposed project would not result in the disturbance of paleontological or archeological resources and no impact is anticipated.

■ Maintenance and Storage Facilities

Traffic. Construction of the bus maintenance facility would interfere with the normal flow of traffic. Impacts would generally last approximately two years. Traffic generated by construction workers and trucks hauling excavated materials or construction supplies would reduce the capacity of, reduce daytime speeds, and cause delays to traffic movement along adjacent streets, such as North Mission Road, Gallardo Street, and the I-5 on/off-ramps at North Mission Road. Lane closures and detours are not anticipated since construction activities would occur on-site and no roadway construction is involved. The Wilshire Boulevard BRT Construction Mitigation Plan provides mitigation measures such that impacts would be reduced to less-than-significant levels.

On-Street Parking. Not Applicable.

Pedestrian Movement. Not Applicable.

Business Access. Not Applicable.

Public Safety. The proposed bus maintenance facility is located in an industrial area and minimal pedestrian activity occurs near the site. There are no adjacent commercial facilities or residential properties. However, construction of the proposed bus maintenance facility would require a barrier to protect the public from

potentially unsafe construction. Construction crews would be trained in safety requirements and procedures. Less-than-significant impacts are anticipated after implementation of mitigation measures listed in the Wilshire Boulevard BRT Construction Mitigation Plan.

Street/Sidewalk Maintenance. Not Applicable.

Noise. Principal noise sources during construction of the bus maintenance facility would include heavy trucks, grading equipment, and diesel engines used to power other construction equipment. When noise from idling trucks is combined with other intermittent construction noise, such as graders, the total sound level at the site could approach peaks of 90 dBA (at a reference distance of 50 feet).

The nearest sensitive land use within the proposed bus maintenance facility are residential uses approximately 0.1 mile (520 feet) to the west of the construction area. Buildings are located between the residential uses and the maintenance facility. These buildings act as barriers, preventing construction noise from the maintenance facility from being clearly audible at the residential uses. Given the distance of the maintenance facility to the residential uses and that buildings separate these two areas from each other, it is anticipated that construction noise from the maintenance facility would not result in a noticeable change in sound level at the residential uses. Construction generated noise would be subject to the City of Los Angeles noise ordinance and the provisions of all applicable laws and regulations. Although construction of the maintenance facility would not have a significant impact on the nearest residential uses, implementation of mitigation measures in the Wilshire Boulevard BRT Construction Mitigation Plan would ensure that construction noise at the maintenance facility is minimized in the surrounding area.

Drainage and Erosion. Construction would impact water quality primarily due to runoff from exposed excavated surfaces. Drainage and erosion control would be necessary to limit impacts to water quality in storm sewers. Implementation of mitigation measures listed in the Wilshire Boulevard BRT Construction Mitigation Plan would reduce impacts to less-than-significant levels.

Air Quality. Construction for the proposed maintenance facility would generate pollutant emissions from a combination of the following construction activities: (1) demolition, (2) grading and excavation, (3) construction worker travel to and from project sites, (4) delivery and hauling of construction supplies and debris to and from project sites, and (5) fuel combustion by on-site construction equipment.

Table 3.8-3 summarizes the estimated daily emissions associated with each construction phase for the candidate site. Daily emissions were derived using the applicable emission factors and formulas found in the SCAQMD CEQA Handbook, Appendix to Chapter 9.

As shown in Table 3.8-3, construction at the proposed maintenance facility is not anticipated to exceed the SCAQMD significance thresholds for four of the five criteria pollutants. PM_{10} is expected to exceed the SCAQMD significance threshold of 150 pounds per day (ppd) during the grading/excavation phase. Increasing on-site soil moisture content to 10 percent would reduce PM_{10} emissions to approximately 39 ppd and 106 ppd

during demolition and grading/excavation, respectively.[2] With implementation of mitigation measures, a less-than-significant impact is anticipated.

Table 3.8-3 Daily Construction Emissions (pounds per day) Maintenance Yard

Construction Phase	CO	ROG	NO_2	SO_2	PM_{10}
Demolition	22	4	32	2	60
Grading/Excavation	47	9	80	6	333
Foundation	47	8	58	4	37
Maximum	*47*	*9*	*80*	*6*	*333*
SCAQMD Threshold	550	75	100	150	150
Potential Threshold Violation?	No	No	No	No	Yes

Source: Terry A. Hayes Associates, 2002

Construction of the bus maintenance facility would not result in the closure of any travel lanes nor would it divert traffic to adjacent streets. However, construction workers and haul trucks traveling to and from the construction site would result in the addition of vehicles on nearby streets. The increase in vehicles would reduce the average speed on nearby streets, which would increase CO concentrations at these roadways. Currently, CO concentrations at nearby roadways do not exceed the State one- and eight-hour CO standards of 20.0 and 9.0 ppm, respectively. Additionally, construction vehicles traveling to and from the construction site would contribute to less than 5 percent of existing traffic volume on nearby roadways. According to the "Transportation Project-Level Carbon Monoxide Protocol" (Institute of Transportation Studies, University of California, Davis, December 1997), a significant increase in traffic would occur if traffic volume increase by 5 percent or more. Increases in traffic volumes in excess of 5 percent are likely to worsen air quality in the affected intersection. Since nearby roadways do not currently exceed the State one- and eight-hour CO standards and construction worker vehicles and haul trucks would not significantly increase traffic on nearby roadways, it is anticipated that the addition of worker vehicles and haul trucks on roadways would not incrementally increase CO concentrations such that the State one- and eight-hour CO standards of 20.0 and 9.0 ppm are exceeded, respectively. Less-than-significant impacts are anticipated.

Hazardous Materials. A Phase I Environmental Site Assessment was prepared for the proposed maintenance facility (*Environmental Site Assessment: Gallardo Street and Mission Road*, A.E. Schmidt Environmental, March 15, 2002). The site assessment included onsite inspection, records searches, and interviews with regulators and persons knowledgeable about the site and surrounding area. The site is currently occupied by auto wrecking yards, auto glass facilities, and a radiator shop. An abandoned hydraulic lift is also located onsite. Several of the businesses handle waste automotive fluids. None operates a fueling facility, and aboveground or underground storage tanks (USTs) are not currently in use at the site.

[2] A three percent soil moisture content was used to calculate PM_{10} concentrations without implementation of mitigation measures. Site watering will increase the soil moisture content to approximately 10 percent. Based on the formulas provided in Table 9-9 of the SCAQMD CEQA Air Quality Handbook, Appendix 9 (1993 edition), a soil moisture content of approximately 10 percent will reduce PM_{10} concentrations to approximately 39 ppd and 106 ppd during demolition and grading/excavation, respectively.

The assessment revealed the following recognized environmental conditions at the site. These hazardous materials could be encountered during construction.

- PCBs are known to have been used in much of the electrical equipment associated with the Pacific Electric Railway (Red Car) and PCB and heavy metal contamination is common at other former Red Car facilities. Despite the fact that parcel soils have been reworked since the trolley yard was demolished, there is some potential for PCB residues to be present in scattered concentration in the soils. The fluorescent lamp ballasts installed throughout the site may also contain PCBs, as well as the hydraulic lifts and older air compressors found onsite.
- Some potential exists for residual contamination with lead, cadmium, and other heavy metals from paint application and potential spillage or disposal, along with possible releases of chlorinated or nonchlorinated solvents used as thinners or for cleaning. Elevated concentrations of metals are generally encountered in rail yards, and there is some potential for these contaminants to be present on the large parcel at levels of concern due to several decades of past use as a trolley yard.
- USTs were found on site. No information was readily available to indicate whether these USTs were removed and no closure data is available to confirm the absence of residual petroleum contamination in these areas of the site. In the absence of UST closure documentation and confirmatory soil monitoring data, there is uncertainty concerning subsurface conditions at each of the locations described in the Phase I study. There is also some risk that these facilities were in the past or remain currently, a source for residual gasoline contamination of groundwater.
- Seven of twenty-one LUST cases identified within 0.5 mile of the site are of some potential concern for groundwater contamination that could influence groundwater quality beneath the subject property. In each case, a responsible party has been identified for the known contamination, reducing potential liability risks for downgradient property owners. Additionally, the former gas station located west of the site across Gallardo Street is of some concern for potential onsite contamination, as the release does not appear to have been adequately characterized and underwent no formal closure. However, the fact that fueling facilities operated on various portions of the subject site in past years, and the absence of site investigation or closure data for these facilities, increases the potential for site liabilities associated with these off-site releases.
- Three hydraulic lifts and a clarifier of unknown age are present at the site and pose some risk of subsurface releases of oily contaminants, and possibly solvents or fuels.
- Evidence of chronic leaks or spills of oils are visible in paved areas throughout the auto wrecking yards.
- Chronic sources of stormwater contamination are evident due to the presence of spills and minor releases on concrete surfaces. Another apparent source of stormwater contamination was a broken sewer pipe. Raw sewage from the open pipe was flowing across the sidewalk into the gutter along Mission Road, degrading surface water quality and posing an imminent health hazard to pedestrians. The auto wrecking yards in general pose some threat to chronic contamination of stormwater.
- Suspect asbestos-containing material (ACM) is present in the form of drywall systems, wall plaster, exterior stucco, and roofing materials.

Potential impacts from these hazardous conditions would be reduced to less than significant with implementation of mitigation measures provided in the Wilshire Boulevard BRT Construction Mitigation Plan.

Paleontological and Archeological Resources. Construction of the bus maintenance facility would require excavation of approximately 40,950 cubic yards of soil. According to the City of Los Angeles General Plan Framework Environmental and Public Facilities Maps (September 1996), the proposed project site is not an archeological site

or an archeological survey area. The site is also not a paleontological site or a paleontological survey area. Additionally, the ground surface within the construction site has been previously disturbed and is unlikely that any such remains (if any exist) would be visible. However, to ensure that all feasible precautions are taken and damage or destruction of resources does not occur, a qualified archaeologist and/or paleontologist with expertise in the area shall be retained to monitor grading and excavation activities. If such monitoring indicates the absence of significant archaeological and/or paleontological deposits, then mitigation of adverse impacts has been achieved and no additional archeological and/or paleontological mitigation is necessary. If cultural resources or remains are found, the archaeologist and/or paleontologist shall have the authority to halt all construction activities in the area of concern until the nature, extent and significance of any such resources are properly assessed and specific additional mitigation can be identified.

Parking Facilities

Traffic. Construction of the two parking facilities would temporarily interfere with the normal flow of traffic. Traffic generated by construction workers and trucks hauling excavated materials or construction supplies would reduce the capacity of, reduce daytime speeds, and cause delays to traffic movement, particularly on Wilshire Boulevard. Trucks would also have the potential to cause traffic impacts, if routes utilized by the trucks are inappropriate (e.g., routes that are primarily residential in nature). Lane closures and detours are not anticipated since construction activities would occur on-site and no roadway construction is involved. Implementation of mitigation measures provided in the Wilshire Boulevard BRT Construction Mitigation Plan would reduce impacts to less than significant.

On-Street Parking. Parking for contractor and subcontractor employees would potentially limit the amount of on-street parking in the construction area. Mitigation measures would be required to reduce impacts of contractor and subcontractor parking to less-than-significant levels.

Pedestrian Movement. Improvements to the lots would occur within the area of the existing parking facilities. It is not anticipated that pedestrian access would be disrupted during the repaving and restriping of the lots. Installation of landscaping may temporarily require the closure of a sidewalk immediately adjacent to the lots; however, this would be a short-term closure. No impacts are anticipated.

Business Access. Improvements to the lots would occur within the block of the existing parking facilities. It is not anticipated that access to existing businesses would be hindered during the repaving and restriping of the lots. No impacts are anticipated.

Public Safety. Parking facilities are located within close proximity to residential uses. A barrier would be placed at the perimeter of the construction sites during construction to protect the public from potentially unsafe construction as well as to prohibit unauthorized entry. Less-than-significant impacts are anticipated after implementation of mitigation measures.

Street/Sidewalk Maintenance. No disruption is anticipated for the street surrounding the parking lots and maintenance would be able to continue as anticipated (with the exception of any lane reconstruction disturbances

discussed above). Sidewalk maintenance would also continue except for short periods where an adjacent sidewalk would be closed during installation of landscaping. Any such closures would be short term and are not anticipated to result in any significant impacts.

Noise. Principal noise sources during construction would include heavy trucks, pavement breakers and diesel engines used to power other construction equipment. When noise from idling trucks is combined with other intermittent construction noise, such as pavement breakers, the total sound level at the site could approach peaks of 90 dBA (at a reference distance of 50 feet). Several residential land uses adjoin the two parking facilities.

Assuming that the frequency of construction noise is approximately 40 percent of the workday (consistent with the United States Environmental Protection Agency—EPA) and that the sound wave propagation path is unobstructed and over a hard surface, it is anticipated that a noticeable change (5 dBA or greater) in the ambient noise level could occur at distances up to 400 feet from the construction noise source during the daytime.[3] However, construction noise would be subject to the City of Los Angeles noise ordinance and the provisions of all applicable laws and regulations. Compliance with the City noise ordinance as well as implementation of mitigation measures in the Wilshire Boulevard BRT Construction Mitigation Plan would reduce construction noise impacts to less-than-significant levels.

Drainage/Erosion. Construction would impact water quality primarily due to runoff from the removal of paved surfaces. Drainage and erosion control would be necessary to limit impacts to water quality in storm sewers. Implementation of mitigation measures provided in the Wilshire Boulevard BRT Construction Mitigation Plan would reduce impacts to less-than-significant levels.

Air Quality. Table 3.8-4 summarizes the estimated daily emissions associated with construction of the two parking facilities. Daily emissions were derived using the applicable emission factors and formulas found in the SCAQMD CEQA Handbook, Appendix to Chapter 9.

As shown in Table 3.8-4, construction of the two parking facilities is not anticipated to exceed the SCAQMD significance thresholds for the five criteria pollutants. However, increasing on-site soil moisture content to 10 percent from site watering (see Mitigation Measure 3.8A-6) would reduce PM_{10} emissions to approximately 3 ppd during the pavement striping phase and 21 ppd during the grading phase at the La Brea/Wilshire site. Increasing on-site soil moisture content to 10 percent would reduce PM_{10} emissions at the Crenshaw/Wilshire site to approximately 8 ppd during the demolition/pavement striping phase and 22 ppd during the grading phase.[4] Less-than-significant impacts are anticipated at the two sites.

[3] Assuming a daytime ambient sound level of approximately 60 dBA.

[4] A three percent soil moisture content was used to calculate PM_{10} concentrations without implementation of mitigation measures. Implementation of Mitigation Measure 3.8A-6 will increase the soil moisture content to approximately 10 percent. Based on the formulas provided in Table 9-9 of the SCAQMD CEQA Air Quality Handbook, Appendix 9 (1993 edition), a soil moisture content of approximately 10 percent will reduce PM_{10} concentrations at the La Brea/Wilshire site to approximately 3 ppd during the pavement striping phase and 21 ppd during the grading phase. Increasing on-site soil moisture content to 10 percent will reduce PM_{10} emissions at the Crenshaw/Wilshire site to approximately 8 ppd during the demolition/pavement striping phase and 22 ppd during the grading phase.

Table 3.8-4 Daily Construction Emissions (pounds per day) Parking Facilities					
Construction Phase	*CO*	*ROG*	*NO_x*	*SO_2*	*PM_{10}*
La Brea/Wilshire					
Pavement Striping	11	2	28	2	5
Grading	15	3	28	2	102
Paving	5	1	7	1	4
Maximum	*15*	*3*	*28*	*2*	*102*
Crenshaw/Wilshire					
Demolition & Pavement Striping	13	3	28	2	11
Grading	16	3	28	2	104
Paving	10	2	13	1	8
Maximum	*16*	*3*	*28*	*2*	*104*
SCAQMD Threshold	550	75	100	150	150

Source: Terry A. Hayes Associates, 2002

Construction of the parking facilities would not result in the closure of any travel lanes nor would construction divert traffic to adjacent streets. However, construction workers and haul trucks traveling to and from the construction sites would result in the addition of vehicles on nearby streets. The increase in vehicles would reduce the average speed on nearby streets, which would increase CO concentrations at these roadways. Currently, CO concentrations at nearby roadways do not exceed the State one- and eight-hour CO standards of 20.0 and 9.0 ppm, respectively. Additionally, construction vehicles traveling to and from the construction site would contribute to less than five percent of existing traffic volume on nearby roadways. According to the "Transportation Project-Level Carbon Monoxide Protocol" (Institute of Transportation Studies, University of California, Davis, December 1997), a significant increase in traffic would occur if traffic volume increase by five percent or more. Increases in traffic volumes in excess of five percent are likely to worsen air quality in the affected intersection. Since nearby roadways do not currently exceed the state one- and eight-hour CO standards and construction worker vehicles and haul trucks would not significantly increase traffic on nearby roadways, it is anticipated that the addition of worker vehicles and haul trucks on roadways would not incrementally increase CO concentrations such that the state one- and eight-hour CO standards of 20.0 and 9.0 ppm are exceeded, respectively. Less-than-significant impacts are anticipated.

Hazardous Materials. Construction for the parking facilities only involves repaving and restriping the existing parking facilities. It is not anticipated that hazardous materials would be encountered. Therefore, no impacts are anticipated.

Archeological and Paleontological Resources. Construction at the parking facilities consists of paving and striping of parking areas; reconstruction of concrete curbs, driveways, and sidewalks as necessary; and landscaping. No excavation activities are involved during construction of the two parking facilities. Additionally, this area has been

previously disturbed. It is not likely that archeological resources would be disturbed should any be located on the construction sites. No impacts are anticipated.

3.8.4 Mitigation Measures

Mitigation measures that are necessary to minimize impacts associated with construction of the Wilshire BRT route, the bus maintenance facility, and the two parking facilities are provided in the Wilshire Boulevard BRT Construction Mitigation Plan.

4.0 EFFECTS DETERMINED NOT TO BE SIGNIFICANT AND OTHER CEQA AND NEPA CONSIDERATIONS

4.1 INTRODUCTION

This section provides an overview of pertinent Federal and State requirements, associated with implementation of the Mid-City/Westside Transit Project. State requirements include the long-term implication of the Project and the effects of the Project determined not to be significant. Federal requirements include (1) Executive Orders pertaining to Floodplains, Wetlands, Endangered Species, and Environmental Justice; (2) the National Historic Preservation Act; and (3) Section 4(f) requirements associated with federal parklands.

CEQA requirements pertaining to the long-term implications of implementing the Wilshire BRT include (1) Significant Unavoidable Adverse Impacts, (2) Cumulative Impacts, (3) Growth-Inducing, and (4) Significant Irreversible Environmental Changes.

4.2 LONG-TERM IMPLICATIONS

4.2.1 Significant Environmental Effects Which Cannot Be Avoided If the Proposed Project Is Implemented

According to the Section 15126.2(b) of the CEQA Guidelines:

> Significant Environmental Effects Which Cannot Be Avoided if the Proposed Project Is Implemented. Describe any significant impacts, including those which can be mitigated but not reduced to a level of insignificance. Where there are impacts that cannot be alleviated without imposing an alternative design, their implications and the reasons why the project is being proposed, notwithstanding their effect, should be described.

Environmental impacts associated with implementation of a project cannot always be mitigated to a level that is considered less than significant through the imposition of project-specific mitigation measures or through the imposition of an alternative project design. In such cases, Findings and a Statement of Overriding Considerations must be prepared prior to approval of the project, in accordance with CEQA Guidelines Sections 15091 and 15093. Because implementation of the proposed project would create several significant, unavoidable impacts, a Statement of Overriding Considerations is required to describe the specific reasons for approving the project, based on information contained within the Final EIR/EIS, as well as any other information in the public record. The significant unavoidable impacts (either project-specific or cumulative) that would result from project implementation are summarized in the Executive Summary. A detailed discussion of each of these impacts can be found in Section 3.0 (Environmental Analysis).

The Final EIR examines the Locally Preferred Alternative, which is the Wilshire Bus Rapid Transit Project operating in the curb lane during peak hours only. The Exposition Corridor will be examined in a separate

environmental document. The Draft and Final EISs/EIRs evaluated an alternative that provides improved bus service. This is discussed in the TSM (Transportation System Management) Alternative. However, the MTA Board adopted the Wilshire BRT as the locally preferred alternative.

4.2.2 Summary of Significant Cumulative Impacts

According to Sections 15130(a) (2), (3), and (4) of the CEQA Guidelines:

> (2) When the combined cumulative impact associated with the project's incremental effect and the effects of other projects is not significant, the EIR shall briefly indicate why the cumulative impact is not significant and is not discussed in further detail in the EIR. A lead agency shall identify facts and analysis supporting the lead agency's conclusion that the cumulative impact is less that significant.
>
> (3) An EIR may determine that a project's contribution to a significant cumulative impact will be rendered less than cumulative considerable and thus is not significant. A projects' contribution is less than cumulatively considerable if the project is required to implement or fund its fair share of a mitigation measure or measures designed to alleviate the cumulative impact. The lead agency shall identify facts and analysis supporting its conclusion that the contribution will be rendered less than cumulatively considerable.
>
> (4) An EIR may determine that a project's contribution to a significant cumulative impact is *de minimus* and thus is not significant. A *de minimus* contribution means that the environmental conditions would essentially be the same whether or not the proposed project is implemented.

Although most temporary short-term construction impacts and most long-term operational impacts associated with the proposed alternatives could be mitigated to acceptable levels, construction of the proposed project in conjunction with future development surrounding the corridor could result in adverse cumulative impacts which could not be completely avoided or mitigated.

Potential cumulative environmental impacts associated with the proposed alternatives include

- Additional traffic on local arterial and collector streets near proposed stations
- Loss of available parking, as well as additional demand for parking
- Increased impacts to air quality

In each case, the Wilshire BRT project provides only a *de minimus* contribution to the cumulative impact of growth in the Los Angeles County area and the SCAG Region, as evidenced by the calculations and forecasts provided in Sections 3.2 (Traffic and Circulation) and 3.3 (Parking). It is also important to realize that the Wilshire BRT will offer the transit-dependent and auto-dependent populations of Los Angeles County the opportunity to have more transportation choices other than the automobile that can run at lower operating and environmental costs and with the fewest possible number of transfers to reach their destinations. Neither the No Project Alternative nor the TSM Alternative addresses how MTA buses will be able to provide relative fast and convenient transit service in the face of the doubling of vehicle hours of travel on the roadway system forecast in Table 1-4. In summary, while the growth of the region and this project will create cumulative impacts, the Wilshire BRT project (and future projects that speed transit relative to auto travel) will be part of the long-range balanced transportation solution for Los Angeles County and will provide benefits to area-wide access through improved mobility in the region as traffic further congests.

Future traffic projections show that traffic volumes would be expected to decrease in the Study Area due to the expected increase in public transit patrons as well as increasing congested traffic conditions (Section 1.0 and Table 1-4). Localized parking impacts would likely occur; however, overall parking supply in the Study Area is expected to increase. To the extent that automobile users take advantage of the BRT system, there would be a correlated increase in available parking. Therefore, cumulative long-term impacts to traffic or parking are not expected as a result of the proposed alternatives, and in any event, the BRT system will be a *de minimus* contributor to overall parking and traffic congestion.

Projected future emission rates from the California Air Resources Board and future traffic levels and future delays in traffic (system speed), based on LADOT and SCAG growth rates, and were used in the air quality analysis. The regional air quality analysis demonstrates a net cumulative benefit to the region's ambient air quality resulting from increased public transit use. The anticipated reduction in automobile use due to the increase in transit use is considered beneficial to ambient air quality. The use of compressed natural gas (CNG) buses for the Wilshire BRT as well as faster transit speeds than under the No Project Alternative will result in a *de minimus* contribution to emissions. The project contributes to the expeditious implementation of the adopted Air Quality Management Plan.

It is significant to note that increasing the speed of the transit system and averting future delays will benefit all transit users as well as taxpayers in general. This is because the system speed of the transit system is intrinsically linked to its operating costs. Delaying a transit vehicle by an additional 109 percent as is called for in the forecast year data will cost at least another 109 percent to operate. To double service under an ever-increasing delay scenario might require deploying twice the numbers of vehicles, plus the expansion of overhead costs and activities such as staffing, maintenance, parking, and insurance.

The demographic areas served by the proposed improvement are the densest in terms of population and employment in the region, and are a trip attractor for up to one-fourth of all commute trips. In addition, access to the area and from the area to other parts of the county will be improved through the TSM enhancements and other demonstration bus programs set up in L.A. County and the Study Area in particular.

Without the benefit of increasing the speed of traffic flow for the bus system, it would take twice as long to run the same level of transit service in the face of the projected 109 percent increase in vehicle delay faced by L.A. County by 2020. The TSM alternative alone cannot efficiently expand the transit services due to the problem of vehicle delay. To the extent that the MTA can separate its traffic from the overall congestion levels experienced with auto traffic, it will be able to attract more and more of the daily travel market and greatly assist Los Angeles in meeting its mobility needs.

It should be noted that the TSM alternative would continue to be implemented. Also, it should be noted that the bus rapid transit concept will further the effectiveness of operating the TSM improvements due to the higher speeds than would otherwise be available for the transit system. The MTA bus fleet expansion will be able to more efficiently and effectively serve the area once the speeds to buses are assured with system of Bus Rapid Transit lanes. The planned Bus Rapid Transit program will improve access to jobs, education, cultural facilities, shopping,

housing, and entertainment countywide directly through the provision of this faster linkage between downtown Los Angeles and Santa Monica and also via the connecting services to the Wilshire BRT stations.

4.2.3 Growth-Inducing Impacts

This section discusses the ways in which the proposed project could foster economic or population growth, either directly or indirectly, including, but not limited to, the removal of obstacles to population growth or the construction of additional housing. Generally, growth-inducing projects are located in isolated, undeveloped, or underdeveloped areas, necessitating the extension of major infrastructure (e.g., sewer and water facilities, roadways, etc.) or are those that could encourage "premature" or unplanned growth (i.e., "leap-frog" development). Although development of the Wilshire BRT improves access mobility, and serves planned urban growth, it is important to note that the proposed transit alternatives will not remove an obstacle to population growth, since the Wilshire Corridor and the Study Area as a whole are already entirely urbanized. Rather, the project will accommodate and serve residents, employees, and visitors to the Study Area and will provide an increased level of public transit service consistent with local and regional growth projections. Although the Wilshire BRT will offer mobility for users, the project will not foster new, unplanned growth beyond that projected for the area. Implementation of the project will not exceed the capacities of existing and proposed infrastructure and governmental services.

Development of any "build" alternative would generate relatively short-term, construction-related employment opportunities. However, the construction phases of any project would require a limited labor force due to the relatively short-term nature of construction employment. Given the ample supply of construction workers in the regional work force (the area from which construction workers would be drawn); the Wilshire BRT would not be considered growth inducing.

Employment opportunities created by the proposed project would also be limited, since the Wilshire BRT is currently served by public transportation and the Division 10 Maintenance Facility would be only modestly expanded. The increase in transit levels of service will provide a slight increase in employment, generally low paying, and is not considered growth inducing. The local labor force would fill a majority of the new MTA positions generated. Management positions may involve recruitment procedures with a target area that is larger than the local region. This could induce a limited number of newcomers to the area. However, this number is expected to be low and not result in any significant adverse growth-inducing impacts.

4.2.4 Irreversible and Irretrievable Commitment of Resources

Section 15126.2(c) of the State CEQA Guidelines requires a discussion of any significant irreversible environmental changes that would be caused by the proposed project should it be implemented. Specifically, the State CEQA Guidelines state that:

> Use of nonrenewable resources during the initial and continued phases of the project may be irreversible since a large commitment of such resources makes removal or nonuse thereafter unlikely. Primary impacts, and particularly, secondary impacts generally commit future generations to similar uses. Also, irreversible damage can result from environmental accidents associated with project construction and operation.

The construction and implementation of the Wilshire BRT would entail the irreversible and irretrievable commitment of construction materials, energy, and human resources; however, this commitment of energy, personnel, and building materials would be commensurate with that of other projects of similar magnitude. Labor would also be committed for the planning, design, construction, and operation phases of the project.

Construction of the proposed project would require the commitment of a variety of non-renewable or slowly renewable natural resources. Energy (in the form of fossil fuels) and construction materials (such as lumber, sand and gravel, metals, and water) would be irretrievably committed for construction of the proposed project. However, there could be some offset of the loss of energy resources. Demolition debris could be recycled for other uses; for example, inert construction debris (e.g., concrete and asphalt) may be crushed and used for road base or for the MTA Division 10 bus parking lot expansion.

Operation of the Wilshire BRT and the expected mode shift and mobility improvement would reduce the use of non-renewable energy sources, and thus would be a beneficial impact of the project.

Ongoing maintenance of the project will entail a further commitment of energy resources in the form of petroleum products (compressed natural gas for the BRT fleet as well as gasoline for supervisory vehicles and diesel for some connecting buses) and electricity. This commitment of energy resources would be a long-term obligation because, practically speaking, it is impossible to return the land to its original condition once it has been developed. However, as established in Section 4.3.8, the impacts of increased energy usage are not considered significant adverse environmental impacts.

In summary, implementation of the proposed project would involve the following irreversible environmental changes to existing natural resources:

- Commitment of natural resources during project construction, including the consumption of fossil fuels and the use of materials in construction (such as steel, concrete, asphalt, and plastics)
- Commitment of energy and water resources and building supplies as a result of the operation and maintenance of the proposed transit corridors

4.3 EFFECTS DETERMINED NOT TO BE SIGNIFICANT

4.3.1 Introduction

Per the requirements of the California Environmental Quality Act (CEQA) Guidelines, this FEIR evaluated a series of topics and concerns that addressed all major areas of the physical environment. Through the process of the draft environmental report and the preparation of this Final EIR, several topics were determined not to be significant. These topics include the following:

- Socioeconomics
- Land Use/Neighborhoods
- Air Quality—Operations
- Noise and Vibration
- Water Resources

- Biological Resources
- Energy Resources
- Community Facilities
- Hazards
- Cultural Resources

The significant issues (traffic and circulation; parking; land acquisition; visual; geology, soils, and seismicity; safety and security; and construction) are evaluated in Section 3.0 of this Final EIR. The discussion below provides a synopsis of the effects determined not to be significant and a summary of why these determinations were made. Unless otherwise stated, the maintenance facility and the parking facilities are considered in the discussions below for the Wilshire BRT Alternative.

4.3.2 Socioeconomics

Population. The Wilshire BRT Alternative would enhance transit service in the Wilshire Corridor but would not directly impact on existing populations, as no displacements would be required to operate this system. An enhanced transit system could serve to attract additional people to the region; however, any increase in population from increased transit capacity is anticipated to be within the population projections developed for the region. The proposed LPA would not increase the population density to levels that would be uncharacteristic to the adjacent neighborhoods or communities. Therefore, no significant impacts are anticipated.

Local Businesses. Operation of the Wilshire BRT would provide the greatest increase in transit capacity compared with the No Action or the TSM Alternatives. As a result, increased visibility for local businesses, as well as an increase in the number of potential patrons that would travel by their business would be the greatest for this alternative. These increases in visibility and access to local businesses would be considered to be a beneficial impact of the LPA.

Many of the businesses located on Wilshire Boulevard are dependent upon the availability of on street parking for their patrons. On-street parking would not be affected by the Wilshire BRT in the Cities of Los Angeles and Beverly Hills; the system would only operate during the peak periods when on-street parking is already prohibited in most of these areas. This alternative would remove nine on-street parking spaces in the City of Santa Monica (for a discussion of this impact, see Section 3.3 of this FEIR). However, this impact would be mitigated to less than significant through the contribution of funding for the City of Santa Monica Parking Fund.

Transit Dependent Populations. The Wilshire BRT Alternative would provide a higher capacity transit system than the other two alternatives considered. This increased capacity, which in turn provides increased accessibility for transit dependent populations to potential employment and other activity centers, would be considered to be a beneficial impact on these populations. Transit dependent populations would also experience fewer delays than those that would be anticipated from the other two alternatives; the Wilshire BRT would operate in an exclusive lane during the A.M. and P.M. peak periods, thereby improving speeds and travel time as compared to the other two alternatives. These improved travel times would also result in a beneficial impact to transit dependent populations.

4.3.3 Land Use/Neighborhoods

Plan and Policy Consistency. The operational bus improvements planned for in the Wilshire BRT Alternative would be consistent with the intent of the plans and policies to enhance the transit system in the Wilshire Corridor. In addition, this alternative would be more consistent with plans and policies than the No Action and TSM Alternatives given that the LPA provides a higher capacity transit service. In addition, the Wilshire BRT Alternative would provide enhanced station areas consistent with policies in the local plans. The Wilshire BRT Alternative, however, would not provide capacity enhancements as great as those anticipated in many of the plans (specifically goals that envisioned the extension of the Metro Red Line along Wilshire). The Wilshire BRT Alternative would also not be consistent with the City of Beverly Hills goal of a grade-separated system. However, these inconsistencies would not be considered significant and the higher capacity provided by the proposed system meets with the general intent of the plans and policies.

Land Use Compatibility. The Wilshire BRT Alternative would involve the introduction of enhanced stations and shelters along Wilshire Boulevard. These shelters would be designed so as not to block visibility of adjacent businesses and business signage. In addition, the shelters would provide enhanced lighting for safety and security, as well as an enhanced appearance of the station area. The Wilshire BRT and its project elements would be consistent with the densely developed Wilshire Corridor, surrounding land uses, and existing transit systems that operate along Wilshire. Therefore, no impact would result.

Community Division. The Wilshire BRT Alternative would provide bus improvements to an existing transportation route along Wilshire Boulevard. This alternative would not introduce any element that would divide existing communities and no impacts are anticipated.

Neighborhood Quality of Life. Operation of the Wilshire BRT would not introduce any transit element that would be disruptive to the existing quality of life. In addition, the Wilshire BRT would provide the greatest transit system enhancements compared with the No Action and TSM Alternatives. This enhanced system provides the opportunity to reduce auto-dependence and congestion, and improve air quality. These factors would result in beneficial impacts from the implementation of the Wilshire BRT project.

Accessibility to Community Facilities. The Wilshire BRT Alternative would provide the greatest accessibility to community facilities compared with the No Action and TSM Alternatives through the provision of a high capacity transit system. This increased accessibility would be considered to be a beneficial impact of the proposed LPA.

4.3.4 Air Quality—Operations

Regional Emissions. CO and NO_x emissions are projected to incrementally decrease when compared to both the No Action and TSM Alternatives, while ROG and PM_{10} emissions are projected to incrementally increase when compared to these alternatives. However, the Wilshire BRT complies with CFR 40 Part 51, as well as SCAQMD daily operation emission thresholds, and therefore no significant impacts are anticipated.

CO Hotspot Analysis. Carbon monoxide concentrations at study intersections would not exceed the State one- and eight-hour CO standard of 20 ppm and 9 ppm, respectively. Therefore, no significant impacts are anticipated.

4.3.5 Noise and Vibration

Noise. Due to the high existing traffic volumes on Wilshire Boulevard, the effect of the added buses is expected to be minimal, with overall noise exposure increases of one decibel or less at all noise-sensitive sites, including the high-rise areas along Wilshire Boulevard. Although sound reflections would occur between buildings in the latter areas, these would result in an increase of no more than 1 to 2 decibels relative to open locations. Given that the projected bus noise levels in these areas are 10 to 15 decibels below the impact threshold, no significant impacts are anticipated from the Wilshire BRT at these and other locations.

Vibration. The Wilshire BRT Alternative operates with rubber-tire buses. Therefore, no significant vibration impacts are anticipated from the implementation of the LPA.

4.3.6 Water Resources

Stormwater Runoff and Flooding. This alternative would not require any grading, and all surface water would continue to drain to the existing storm drain systems at the existing volumes and velocities. Therefore, no significant impacts to the direction, rate, or flow of surface water are anticipated with implementation of this alternative.

Implementation of this alternative would neither create nor contribute to runoff that would exceed the drainage and flood control capacity of the storm drain system, nor would it impede or redirect flood flows. Furthermore, because the transit stops are located outside of the street systems, where a majority, if not all, of the drainage occurs, implementation of this alternative would also not expose people and/or property to water-related hazards. Impacts resulting from flood hazards with implementation of the Wilshire BRT would not be significant.

Groundwater. Implementation of the Wilshire BRT Alternative would also not result in an increase in the amount of impervious surfaces. Therefore, there would be no impact to groundwater resources (e.g., direction, rate, flow, or quality). Further, this alternative will not draw from any groundwater aquifer. Thus, no impact to groundwater resources would result.

4.3.7 Biological Resources

Local Designated Plan/Animal Species and Communities. There are no threatened or endangered species in the Study Area. In addition, operation of the Wilshire BRT route would be limited to the curb lane along Wilshire Boulevard. Station area landscaping would be installed and the two parking facilities would be densely landscaped. Beneficial impacts to biological resources would result from the LPA given the landscaping planned for stations and parking facilities.

4.3.8 Energy Resources

Use of Non-Renewable Resources in a Wasteful Inefficient Manner. It is anticipated that fuel consumption would be reduced with the proposed transit capacity improvements. Fuel consumption under the Wilshire BRT Alternative is approximately 0.01 percent less than both the No Action Alternative and the TSM Alternative. Thus, impacts would be beneficial when compared with the other alternatives since a fuel consumption reduction would occur.

4.3.9 Community Facilities

Access to Community Facilities. The Wilshire BRT Alternative would operate in the curb lane and would have minimal disruptive effects to localized circulation near community facilities. In addition, access to community facilities would be enhanced through the implementation of a higher capacity transit system.

Displacement of Community Facilities. No property would be acquired for the implementation of the Wilshire BRT Alternative and therefore no community facilities would be displaced. No significant impacts are anticipated.

4.3.10 Hazards

Hazardous Material Discovery and Removal. Operation of the Wilshire BRT would not involve the use or disruption of hazardous materials. Potential hazardous materials may be used at the maintenance facility; however, the use of any such material would not differ from the existing bus maintenance operations already on site. Safe practices are used and would continue to be used in the handling and disposal of any such materials. Potential impacts during construction are discussed in Section 3.8.

4.3.11 Cultural Resources

Direct Effects on Paleontological Resources. Operation of the Locally Preferred Alternative would not involve physical changes to the environment and would operate within the existing ROW. Therefore, this alternative would have no impact on paleontological resources.

In the event that grading and excavation for reconstruction of the curb lane or the maintenance facility extends below the depth of existing disturbed materials, mitigation measures would be implemented to monitor activities (see the discussion of construction impacts in Section 3.8).

Direct Effects on Archaeological Resources. Operation of the Locally Preferred Alternative would not involve physical changes to the Study Area and would operate within the existing ROW. Therefore, this alternative would have no impact on archaeological resources.

In the event that grading and excavation for reconstruction of the curb lane or the maintenance facility extends below the depth of existing disturbed materials, mitigation measures would be implemented to monitor activities (see the discussion of construction impacts in Section 3.8).

Direct and Indirect Effects on Historical Resources. Operation of the Wilshire BRT would not directly or indirectly impact historical resources within the Study Area.

Construction of the LPA may result in the removal or relocation of potentially historic electroliers and other fixtures, such as streetlights, along Wilshire Boulevard in selected station locations where the new shelter is to be located. Mitigation measures would be implemented to address the removal or relocation of these fixtures (see the discussion of construction impacts in Section 3.8).

4.4 EXECUTIVE ORDER PERTAINING TO FLOODPLAINS

Executive Order 11988 (Floodplain Management) links the need to protect lives and property with the need to restore and preserve natural and beneficial floodplain values. Specifically, federal agencies are directed to avoid conducting, allowing, or supporting actions on the base floodplain unless the agency finds that the base floodplain is the only practicable alternative location. Similarly, Department of Transportation (DOT) Order 5650.2, which implements Executive Order 11988 (Floodplain Management) and was issued pursuant to the National Environmental Policy Act of 1969, the National Flood Insurance Act of 1968, and the Flood Disaster Protection Act of 1973, prescribes policies and procedures for ensuring that proper consideration is give to the avoidance and mitigation of adverse floodplain impacts in agency actions, planning programs, and budget requests.

4.4.1 Impacts

The Wilshire BRT project traverses a limited portion of flood hazard areas, which are defined as the 100-year or 500-year floodplains. However, none of the alternatives travels though naturally occurring floodplains, such as rivers, streams, or alluvial floodplains; instead, the alternatives would be implemented within the limits of existing roadway rights-of-way. The Maintenance Facility at Chavez and Mission is not within either the 100-year or the 500-year flood plain.

Flooding along the Wilshire Boulevard Corridor and at MTA Division 10 Study Areas is the result of a 100-year or 500-year flood currently caused by an overflow of existing undersized storm drain systems. This flooding exists within the Study Area, and would continue to exist whether or not any of the alternatives were implemented. Furthermore, none of the alternatives would worsen existing flooding conditions or expose people or property to increased flood hazards. As city engineering departments review MTA's detailed construction plans, they may require larger drains or drain screens to keep out debris, which would increase drainage capacity for the entire area.

Because flooding (as the result of a 100-year or 500-year flood event) occurs throughout the Study Area and along each of the primary east/west travel corridors that connect downtown Los Angeles to Santa Monica, there is no practicable alternative that would both achieve the project objectives (i.e., to provide improved transit services to the Westside of Los Angeles) while avoiding any impacts to the base floodplain. Therefore, there is no practical alternative to any of the project alternatives, and compliance with Executive Order 11988 and DOT Order 5650.2 can be achieved.

4.5 EXECUTIVE ORDER PERTAINING TO WETLANDS

This order, issued in 1977, directs all federal agencies to avoid, if possible, adverse impacts to wetlands and to preserve and enhance the natural and beneficial values of wetlands. Each agency shall avoid undertaking or assisting in wetland construction projects unless the head of the agency determines that there is no practicable alternative to such construction and that the proposed action includes measures to minimize harm.

4.5.1 Impacts

The proposed project alternatives in the Wilshire Corridor and for the Division 10 Maintenance Facility would not cross, intersect with, or remove areas designated as wetlands. Thus, the proposed Wilshire BRT project would not invoke the provisions of Executive Order 11990.

4.6 EXECUTIVE ORDER PERTAINING TO ENDANGERED SPECIES

Adopted in 1973, this act requires federal agencies, in consultation with and with the assistance of the Secretary of the Interior or of Commerce, as appropriate, to ensure that actions they authorize, fund, or carry out are not likely to jeopardize the continued existence of threatened or endangered species or result in the destruction or adverse modification of critical habitat for these species.

4.6.1 Impacts

As discussed in Section 4.3.7 of this report, there are no threatened or endangered species known to exist in the Wilshire Corridor or at MTA Division 10 that would be affected by the proposed Wilshire BRT project. Similarly, there are no natural habitat areas that would be affected by the transit alternatives under consideration. Thus, the proposed project alternatives would not invoke the requirements of the Endangered Species Act.

4.7 EXECUTIVE ORDER PERTAINING TO ENVIRONMENTAL JUSTICE

On February 11, 1994, President Clinton issued an "Executive Order on Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations." This Order is designed to focus federal attention on environmental and human health conditions in minority communities and low-income communities. The Order is further intended to promote non-discrimination in federal programs substantially affecting human health and the environment and to provide for information access and public participation relating to such matters.

The approach in this Final EIR is to achieve compliance with both the letter and spirit of the Executive Order by addressing the question of whether, and how, the impacts of the project and its alternatives may disproportionately affect minority and low-income populations.

Section 4.3.2 analyzes the socioeconomic impacts of the Wilshire BRT and concludes that there are no significant impacts to population or employment. The beginning of this section also points out the benefits of increasing the transit speeds to all users of the MTA transit system, as well as the taxpayers who fund it, and the public generally.

This section analyzes the distributional patterns of minority populations and low-income populations on a regional basis and characterizes the distribution of such populations adjacent to the project alternatives. The analysis then focuses on the existing environmental conditions and impacts relative to these populations and analyzes how project impacts affect these populations, focusing on possible disproportionate effects and potential exacerbation of existing conditions.

The unit of analysis in this Final EIR for impacts on minority populations and low-income populations is the Census Block Group. Baseline data provided in this section is from the 1990 United States (US) Census. For each of the Census Block Groups the following information is included:

- Total population
- Black/African American population
- Asian/Pacific Islander Population
- American Indian Population
- Hispanic Population
- Households at Poverty Level

Low-income households defined as "Poverty Level" are households whose incomes met the 1990 Los Angeles County threshold for poverty at less than $8,104 dollars. Data used is from the 1990 Census, since at the time the Notice of Preparation was issued, Year 2000 Census data was not yet available.

4.7.1 Wilshire Corridor

Tables 4-1 and 4-2 show the ethnic breakdown and number of poverty level households for a 0.5-mile distance on either side of the corridor and a 0.5-mile radius of the Wilshire BRT station locations.

Table 4-1 Ethnic Breakdown Within 0.5 Mile of the Wilshire BRT and Region

Category	Numbers of Individuals	Regional Percentages	Numbers of Individuals in Corridor	Corridor Percentages
Persons		*100*	*178,866*	*100*
Black	930,957	11	11,589	6
Asian	1,137,500	13	23,792	13
Hispanic	4,242,213	49	18,382	10
American Indian	76,988	1	566	0.3
Non-minority	2,239,997	26	124,537	69.6
Households			*86,367*	*100*
Poverty			21,581	12

Source: 1990 US Census

Regional percentages are compared to minority and poverty concentrations near stations in the table above. The numbers show that while non-minority population countywide is 26 percent, the non-minority population along the corridor is 70 percent. Hispanic population in the county is 49 percent of total and the corridor Hispanic population is 10 percent. There is no difference in the corridor percentage of Asians and the countywide percentage and there is no significant difference between the American Indian population and the corridor percentage of American Indian people.

The table below shows the station population by ethnic groups. As can be seen from the table, there is no particular pattern regarding stations and their surrounding ethnicity. The primary observation is that the most people are served at the downtown end of the line, especially at the Western, Fairfax, La Cienega, and Robertson stations.

For purposes of this analysis, an area that contains one-third or more (of the total population) of high minority or low-income population is considered a "high concentration." While the Census data used is from the 1990 US Census, it is assumed that similar demographic trends have occurred within the Census Block Groups that were examined in this analysis over the twelve years since the 1990 Census was taken.

Table 4-2 Ethnic Breakdown Within 0.5 Mile of the Wilshire BRT Stations

Station	Persons	Black	Asian	Hispanic	American Indian	Households	Poverty
Western	2,550	293	922	696	30	1,218	419
Crenshaw	566	19	175	138	1	204	72
La Brea	826	16	195	52	0	281	96
Fairfax	1,288	128	142	98	2	890	228
La Cienega	1,027	11	24	39	2	619	85
Robertson	2,106	44	75	105	6	1,159	123
Beverly	557	5	34	26	0	284	0
Santa Monica	1,066	7	58	63	4	571	48
Westwood Village	2,651	58	548	154	5	1,450	690
Barrington	1,169	382	12	99	11	928	62
Bundy	1,815	54	172	175	12	977	145
14th	1,155	39	60	85	3	448	125
4th	712	30	18	58	4	543	173
Ocean	821	19	7	42	0	636	221

Source: 1990 US Census

4.7.2 Impacts

The impact analysis is based on the consideration of the locations of minority populations and low-income populations throughout the Study Area and specifically within one mile of the alternative route corridors, as

defined by the Census Block Group classification and distribution. Key elements of the analysis throughout the following section include consideration of

- Comparison of populations along the Wilshire BRT Corridor to Regional data
- Disproportionate project impacts on high minority populations and low-income populations along the routes
- Disproportionate project impacts when considering existing conditions or location-related patterns for existing impact sources and burdens
- Factors that influence or increase the disproportionalities noted

The Wilshire Corridor as a whole contains 30.3 percent minority population and 24.9 percent low-income population. The breakdown of minority and low-income population at each individual BRT station is as follows:

Table 4-3 Percentage of Minority and Low-Income Populations, Wilshire Corridor

Station	Minority	Low Income
Western	65%	34%
Crenshaw	59%	35%
La Brea	31%	34%
Fairfax	28%	25%
La Cienega	7%	13%
Robertson	11%	1%
Beverly	11%	0%
Santa Monica	12%	8%
Westwood	28%	47%
Barrington	43%	6%
Bundy	22%	14%
14th	16%	27%
4th	15%	32%
Ocean	8%	34%
Straight-line Average	25%	22 %

Source: 1990 US Census

As shown in Table 4-3, several station locations contain a mixture of high-minority and low-income households. The Western Avenue, Crenshaw Boulevard, and La Brea Avenue station areas contain the highest concentrations of both minority and low-income households. The Barrington Station contains 43 percent minority and 6 percent low income.

The high percentage of low-income households near the Westwood Village station area can be attributed to the large numbers of UCLA students housed in the area. While several station locations contain high concentrations of minority and low-income populations, the Corridor as a whole contains less than 33 percent minority and low-income households. Because the percentage of minority and low-income populations is below the threshold of 33

percent (with a minority population of 30 percent and a low-income population of 25 percent), infrastructure and environmental impacts associated from the proposed Wilshire BRT would not disproportionately affect low-income or minority populations in close proximity to the project area. Therefore, the impacts are not considered significant to low-income and minority households.

4.8 NATIONAL HISTORIC PRESERVATION ACT

Section 106 of the National Historic Preservation Act of 1966, as amended through 1992 (16 U.S.C. Section 470), and 36 CFR Part 800: Protection of Historic Properties, are the two key federal regulations protecting historic resources. Section 106 requires that federal agencies take into account the effect of carrying out federally funded, assisted, or licensed projects on resources identified as included in, or determined eligible for, the National Register. This law is set up so that, in the planning stages, the widest range of feasible alternatives can be investigated. 36 CFR Part 800 specifies the "Criteria of Effect," which is the method applied to determine whether or not a project would adversely affect those characteristics qualifying a resource for inclusion on the National Register. Federal agencies follow these steps in the Section 106 review process:

1. Determine that the Section 106 provisions apply to the undertaking or proposed action
2. Define the Area of Potential Effect (APE)
3. Identify historic, archaeological, and cultural resources, and evaluate their significance to determine eligibility for listing in the National Register
4. Apply the criteria of effect and adverse effect to determine impacts on identified resources
5. Consult with the State Historic Preservation Officer (SHPO) and other interested persons, agencies, and Indian tribes (if applicable) as to agreed-upon appropriate mitigation measures
6. Execute a Memorandum of Agreement (MOA) with the SHPO that specifies the mitigation measures and who is responsible for their implementation
7. Obtain the comments and concurrence of the Advisory Council for Historic Preservation

The first four steps have been completed and are summarized below. The final four steps will be completed prior the issuance of the Record of Decision. Formal consultation with the SHPO and others to define impacts on historic properties and determine how to resolve them will be undertaken after the FEIS is completed and prior to issuance of a Record of Decision. The views of the public as expressed in the comments on the Draft EIS will be addressed in the consultation.

The cultural resource investigation was a phased effort. 36 CFR 800.4(b)(2) provides the following: "Where alternatives under consideration consist of corridors or large land areas, or where access to properties is restricted, the Agency Official may use a phased process to conduct identification and evaluation efforts." As specific aspects or locations of an alternative are refined or access is gained, the Agency Official shall proceed with the identification and evaluation of historic properties in accordance with 800.4(b)(1) and (c). In this particular study, the use of low floor articulated CNG buses along an existing corridor is under consideration along with expanding the MTA Division 10 Maintenance Facility into areas already owned by the MTA.

4.9 SECTION 4(f)

Public recreational lands and facilities (including local parks), significant cultural resources, natural wildlife refuges, and schools (to the extent that school facilities are open and available to the general public for recreational purposes) are afforded special protection by Section 4(f) of the U.S. Department of Transportation Act of 1966. The following land use types include potential Section 4(f) lands:

- Beach Parks
- Local Park and Recreation Lands (Undeveloped)
- Local Park and Recreation Lands (Developed)
- Regional Park and Recreation Lands (Undeveloped)
- Regional Park and Recreation Lands (Developed)
- Colleges and Universities
- Elementary Schools
- Junior or Intermediate High Schools
- Pre-Schools Daycare Centers
- Senior High Schools
- Trade Schools
- Lands of Historic Significance

The courts have found that any National Register property, and any property determined eligible for the National Register, is a "historic site" for purposes of Section 4(f).

Section 4(f) lands within or adjacent to the Wilshire Corridors are presented in Table 4-4.

Table 4-4 Parkland and Recreational Sites, Wilshire Corridor

Park	Location
Macarthur Park	Wilshire Boulevard / Alvarado Boulevard
Lafayette Park	Wilshire Boulevard / Hoover Street
La Brea Tar Pits	Wilshire Boulevard / Curson Avenue
Carthay Circle Park	Wilshire Boulevard / Crescent Heights Boulevard
Douglas Park	Wilshire Boulevard / Chelsea Avenue
Lincoln Park	Wilshire Boulevard / 7th Street
Junior High School	Wilshire Boulevard / Highland Avenue

Source: Thomas Brother's Guide/EIP Associates, 2000

There are no 4(f) properties within or adjacent to the MTA division 10 Maintenance Facility.

Direct use (i.e., encroachment) of Section 4(f) lands by federally funded transportation projects is prohibited unless it can be demonstrated that there are no prudent alternatives. If no prudent alternatives exist, design and mitigation measures must be implemented to reduce potentially significant or significant effects. Indirect effects to

Section 4(f) lands may involve altering access at bus stop locations, casting shadows, or other substantive changes to the visual setting.

4.9.1 Impacts to Parklands

Since the Wilshire BRT would operate within the public street, and the Division 10 Maintenance Facility is an existing use and will simply be expanded, the potential for direct use of parklands does not exist. There may be indirect effects, however, to significant cultural resources, which are also covered by Section 4(f), as described previously in Section 4.3.11 (Cultural Resources).

Indirect or Direct Impacts on Section 4(f) Lands. The proposed transit alternatives would involve construction and operation within public streets and expansion of the existing Maintenance Facility on lands already owned by the MTA, and would not result in any direct or indirect physical disruption of public lands, including Section 4(f) lands.

4.9.2 Impacts to Cultural Resources

As described above, Section 4(f) of the Department of Transportation Act of 1966 states that federal funds cannot be used for any "program or project which requires the use of any publicly owned land from a public park, recreation area, or wildlife and waterfowl refuge of national, State, or local significance as determined by the federal, State, or local officials having jurisdiction thereof, or any land from an historic site of national, State, or local significance as determined by such officials unless (1) there is no feasible and prudent alternative to the use of such lands, and (2) such program includes all possible planning to minimize harm to such park, recreational area, wildlife and waterfowl refuge, or historic site resulting from such use." The word "use" refers to either a direct or a constructive use of the property. A direct use occurs when land is permanently incorporated into a transportation facility of a partial or full acquisition or easement of the property is required. Constructive use occurs when the project's proximity impacts are so severe that the activities, features, or attributes that qualify a resource for protection under 4(f) are substantially impaired. Typically, a constructive use of a resource would involve permanent and severe noise, vibration, visual, or access impacts. As outlined in Subsection 23 CFR 771.135(p)(4), a constructive use of a protected resource occurs under any of the following situations:

- Predicted noise level increase, attributable to the proposed project, substantially interferes with the use and enjoyment of a noise-sensitive facility of a resource
- Proximity of the proposed project substantially impairs the aesthetic features or attributes of a resource, where such features or attributes are considered important contributing elements to the value of the resource
- Restricted access, which substantially diminishes the utility of a publicly owned park, recreation area, or historic site
- Vibration associated with the proposed project impairs the use of a resource
- Ecological intrusion of the proposed project diminishes the value of wildlife habitat in a wildlife or waterfowl refuge adjacent to the project
- Substantial interference with the access to a wildlife or waterfowl refuge when such access is necessary or established wildlife migration or critical life cycle processes

The following sections evaluate park, archaeological and historic as they relate to Section 4(f). After reviewing the 4(f) evaluation, FTA may determine that (1) there is no prudent or feasible alternative to using 4(f) properties in this section; and (2) the project includes all possible planning to minimize harm to parks, recreation areas, wildlife and waterfowl refuges and historic site resulting from the use. With this determination, Section 4(f) permits the Secretary of Transportation to approve a project for federal funding participation or other federal undertaking that requires the use of publicly owned land from a park; recreation area; wildlife and waterfowl refuge of national, State, or local significance; or any land from a historic site of national, State, or local significance. The U.S. Department of the Interior and the State Historic Preservation Officer (SHPO) will be consulted regarding Section 4(f) properties before publication of the Record of Decision.

Section 4(f) Properties

This section describes the Section 4(f) properties that would be affected by the project alternatives. No such properties would be affected by the No Action or TSM Alternatives. Historic, archaeological, and paleontological resources that would be affected by the Wilshire BRT are identified below. For these properties, a description and the significance of the affected property and the application of Section 4(f) criteria for use are presented. Alternatives that would avoid use, measures to minimize harm, and agency coordination are also described.

Electroliers and Other Fixtures, Such As Streetlights, along Wilshire Boulevard

Description and Significance of Affected Property

The electroliers and other fixtures along much of Wilshire Boulevard were installed prior to 1950, and contribute to the historical setting of the Boulevard itself. Additionally, a trend towards the nomination of "National Register Utilities Districts" has emerged, and is practiced by agencies such as Caltrans. Although they have not yet been studied in detail, the fixtures along Wilshire Boulevard may be potentially eligible for the National Register in just such a context, as a potential historic district.

Application of Section 4(f) Criteria for Use

If formal consultation with the SHPO results in a determination that the fixtures on Wilshire Boulevard are eligible or potentially eligible for the National Register either individually or as a district, the Wilshire BRT could alter the physical properties of a potential historic resource and would materially alter its historical integrity. This would constitute an adverse effect under Section 106 of the NHPA, as described in Section 4.3.11 (Cultural Resources), and would be mitigated by documenting the electroliers or by incorporating them in the final design of the project.

Alternatives That Would Avoid Use

The No Action and TSM Alternatives, which have been analyzed in this Draft EIR, would not involve substantial physical change to Wilshire Boulevard, and would therefore result in no effect upon the electric fixtures along Wilshire Boulevard. While a BRT system could be implemented on other east/west streets, Wilshire is a

designated transit corridor, and no substantial transit improvement would then be provided within an area of established need.

Measures to Minimize Harm

As described in Section 4.3.11 (Cultural Resources), mitigation would require evaluation and HAER recordation, if appropriate, of the electric fixtures along Wilshire Boulevard, and the development of an MOA between MTA, SHPO, and other interested parties. The Construction Mitigation Plan (CMP) provides that if buried cultural materials are encountered during construction activities, the activities shall cease until a qualified archaeologist has determined the significance of the materials. Further, if human remains are discovered, the county Coroner would be called to make necessary findings as to origin and disposition pursuant to Public Resources Code Section 5097.98.

Agency Coordination

As required, MTA would work with FTA and SHPO to determine agreed-upon mitigation measures that will minimize the impacts on the electric fixtures on Wilshire Boulevard.

5.0 COMMUNITY PARTICIPATION

5.1 INTRODUCTION

5.1.1 Background

This section documents the Mid-City/Westside Transit Corridor Study Public Involvement Program process over the course of three phases. Phase I, the Major Investment Study (MIS) was completed in March 2000, Phase II, included the scoping process and the release of the Draft Environmental Impact Statement/Draft Environmental Impact Report (Draft EIR), and Phase III, includes the lead agency response to comments and release of the Final EIR. This section is not intended to address each and every concern raised, but rather documents the community participation activities and the environmental review process. Responses to public comments are contained in Section 9.0.

5.1.2 Objectives

The goals of the public involvement program have been to:

- Create a public involvement process that allows all those with a relevant stake in the MIS/EIR an opportunity to participate in its development;
- Identify, catalog, and respond to issues of concern to the public with regard to the MIS/EIR and identify potential mitigations where appropriate; and
- Manage the public involvement program in a manner that maximizes public participation in the planning and environmental processes for the project.

5.2 PUBLIC INVOLVEMENT AND ENVIRONMENTAL REVIEW PROCESS

5.2.1 Notice of Intent/Notice of Preparation (NOI/NOP)

The federal Notice of Intent (NOI), in accordance with NEPA, was issued on May 19, 2000, and was printed in the Federal Register on May 19, 2000 (Volume 65, No. 98). The NOI announced the MTA and FTA's intent to prepare a joint EIR document in accordance with Federal and State environmental guidelines. It included information on the project background, the alternatives, the MIS process, FTA procedures, scoping meetings held, and contacts and sources of further information. The NOI and NOP commenced the 30-day public scoping period for the EIR to help determine the scope and content of the environmental analysis. The scoping comment period closed on June 23, 2000.

In accordance with CEQA, Notice of Preparation (NOP) announcing the MTA and FTA's intent to prepare an EIR was also mailed on May 8, 2000. Like the NOI, the NOP described the proposed project and requested input from agencies, organizations, and individuals. The alternatives and the anticipated effects were briefly described.

The scoping comment period for the NOP also closed on June 23, 2000. The State Clearinghouse designated this as project No. 2000051058.

The NOI and NOP are included as Appendix E.

5.2.2 Activities

Stakeholder Identification

Throughout the public involvement process, individuals, community organizations, businesses, homeowner associations, business groups, and public agencies that may be affected by, or have an interest in, the Mid-City/Westside Transit Corridor study were identified. Key objectives were to identify and contact key community stakeholders, to inform stakeholders and their communities about plans to improve transit on the Westside, and to gather public comment. The stakeholders that have been identified to date and contacted are listed below.

Chambers of Commerce Business Groups

- Beverly Hills Chamber of Commerce
- Los Angeles Area Chamber of Commerce
- Mid-City Chamber of Commerce
- Wilshire Chamber of Commerce
- Los Angeles Area Chamber of Commerce
- Korean American Chamber of Commerce
- Crenshaw Chamber of Commerce
- Santa Monica Chamber of Commerce
- West Los Angeles Chamber of Commerce
- Los Angeles Business Council
- Miracle Mile Chamber of Commerce
- Greater Los Angeles African American Chamber of Commerce
- Venice Area Chamber of Commerce
- Brentwood Village Chamber of Commerce
- Brentwood Chamber of Commerce

Homeowner Associations

- Baldwin Neighborhood Homeowners Association
- Beverly Angeles Homeowners Association
- Beverly Roxbury Homeowners Association
- Beverlywood Homeowners Association
- Brentwood Glenn Homeowners Association
- Brentwood Hills Homeowners Association
- Brentwood Homeowners Association
- California Country Club Homes Association

- Carthay Circle Homeowners Association
- Castle Heights Neighborhood Association
- Century Westwood Watch
- Cheviot Hills Homeowners Association
- Country Club Park Homeowners Association
- East Culver City Neighborhood Alliance
- Friends of Sunset Park
- Friends of Westwood, Inc.
- Hancock Park Association
- Hancock Park Homeowners Association
- Hayden Tract Business Group
- La Brea/ Hancock Homeowners Association
- Lafayette Neighborhood Association
- Larchmont Village Neighborhood Association
- Longwood Area Neighborhood Association
- Melrose Action Committee
- Melrose Neighborhood Association
- Miracle Mile Homeowners Association
- Miracle Mile Residential Association
- Rancho Higuera Association
- South Carthay Neighborhood Association
- South of Robertson Neighborhood Association
- South West Association of Neighbors
- Tract No. 7260 Neighborhood Watch
- Victoria Park Association
- Village Green Homeowners Association
- West Adams Heritage Association
- West of Westwood Homeowners Association
- Westside Civic Federation
- Westside Resident's Association
- Westwood Gardens Civic Association
- Westwood/Holmby Hills Homeowners Association
- Westwood Homeowners Association
- Westwood South of Santa Monica
- Wilshire Homeowners Association
- Wilshire Park Association
- Wilshire/Montana Neighborhood Coalition
- Windsor Square Neighborhood Association

- Windsor Village Community Association
- Windsor Village Homeowners Association

■ Stakeholder Outreach

Project Fact Sheet

A project fact sheet was prepared that provided an update of the current planning process for the study. The fact sheet, plus illustrative maps, discussed the new transit improvements under evaluation in the Mid-City/Westside Corridor Study Area, the importance of the Corridor, other studies that are being conducted, current transportation needs, the study area, alternatives and a schedule. The team distributed the project fact sheet to all interested stakeholders via mail, fax, meetings, and community open houses.

Update Mailing

Various means were used to invite public comment on the project. At the initiation of the study period, the team mailed a letter to over 12,000 addresses, including but not limited to homeowner associations and business interests, throughout the Mid-City/Westside Transit Corridor. The mailing resulted in the distribution of public information about the study in homeowner association newsletters and meetings. The letter updated stakeholders about important milestones and the status of the study process, and contained information on important decisions made by the MTA Board regarding the study. The public information materials also included the names and contact information of who to send comments to, and information on how to access the project hotline number. The mailing materials encouraged everyone's participation and feedback.

The public outreach team coordinated 12,464 individual pieces of mail to the organizations listed in Table 5-2.

In addition, letters and flyers were sent to the stakeholders throughout the Study Corridor, and follow-up phone calls were made, when necessary.

A number of homeowner associations, neighborhood associations, and interest groups submitted comments at each community open house as well as by mail, fax, and e-mail. Most of the submitted comments came from individuals interested in the project but unable to attend one of the community open houses, or from individuals that desired to have a formal role in the process.

■ Website/Media Outreach and Coordination

Following is a description of outreach conducted through the Web and local media:

- The project team placed community calendar articles in the *Larchmont Chronicle*, the *Los Angeles Times*, the *Sentinel*, the *Westside Weekly*, and independent publications (i.e., *Wilshire*, *Westsider*, etc.).
- Contacted the following newspapers:
  - *The Wave*
  - *Brentwood Media Group* (Monthly)
  - *Downtown News*

Table 5-2 List of Organizations Contacted

Pieces	Organization
150	Victoria Park Association
20	Rancho Higuera
500	East Culver City Neighborhood Alliance
650	Village Green
300	Windsor Village Homeowners Association
380	West Adams Heritage
114	MTA Rentals/Lease
100	Rose & Kindel
900	Homeowners Associations
1000	HOPE Community Resource Center (Crenshaw Area)
950	Tract 7260
2000	West of Westwood
650	Westwood Gardens
1500	Westside Resident's Association
100	Office of Councilmember Ruth Galanter
300	Office of Councilmember of Mark Ridley-Thomas
1000	Santa Monica Chamber of Commerce
1000	Westside Homeowners Association
350	Santa Monica Planning Dept.
500	Scoping Meetings *(See Section 6.3 below)*

  - › *Jewish Journal*
  - › *Korea Times*
  - › *Santa Monica Mirror*
- Placed advertisements in the following newspapers during the week of May 17, 2000:
  - › *LA Times* (Our Times Editions)
  - › *LA Times* (Southern California Living)
  - › *The Sentinel*
  - › *L.A. Independent*
  - › *Wilshire Independent*
  - › *Culver City Chronicle*
  - › *Westsider*

The advertisements are included as Figure 5-1.

Hotline

A hotline was set up to provide the public with immediate access to accurate, up-to-date information about the project. The hotline briefly describes the planning process and the opportunities for public involvement. Callers



Advertisement in the **South of Robertson (SORO)newsletter**.
Advertisement in the **St. Andrews Homeowners Association newsletter**.

Placed community calendar articles in the ***Larchmont Chronicle***, **the *Los Angeles Times*, the *Sentinel*, the *Westside Weekly***, independent publications (i.e., *Wilshire*, *Westsider*, etc.).

Contacted the following newspapers:
The Wave, Brentwood Media Group (Monthly), Downtown News, Jewish Journal, Korea Times, and ***Santa Monica Mirror.***

Placed advertisements in the following newspapers during the week of May 17th, 2000:
Los Angeles Times (Our Times Editions)
Los Angeles Times (Southern California Living)
The Sentinel
L.A. Independent
Wilshire Independent
Culver City Chronicle
Westsider

SOURCE: Terry A. Hayes Associates LLC, 2000

Mid-City/Westside Transit Corridor
LOS ANGELES COUNTY METROPOLITAN TRANSPORTATION AUTHORITY

FIGURE 5-1
COMMUNITY MEETING ADVERTISEMENTS

had the option of leaving a detailed message, or simply leaving their contact information so that they could receive additional information.

5.3 SUMMARY OF THE EIR SCOPING PROCESS

The public scoping comment period for the EIR commenced on May 23, 2000, and ended on June 23, 2000. Homeowner associations, chambers of commerce, community organizations and the general public were contacted by phone, as a supplement to the mailings, to encourage their members' participation in the environmental review process and in determining the scope and content of the EIR.

5.3.1 Public Scoping Meetings

After completion of the MIS and during the scoping period (May 23 through June 23, 2000) for the Draft EIR, the public had the opportunity to attend five scoping meetings. The locations and dates of these scoping meetings are provided in Table 5-3.

Table 5-3 Mid-City/Westside Corridor EIR Scoping Meetings

Location	*Date*
Mid-Wilshire/Beverly Hills/West Los Angeles	
Peterson Automotive Museum	May 23, 2000, Wednesday
Veterans Administration Hospital of West Los Angeles	May 31, 2000, Wednesday
Santa Monica	
Ken Edwards Center	June 6, 2000, Tuesday
Exposition Park/Crenshaw District	
California African-American Museum	June 7, 2000, Wednesday
Culver City	
Veterans Memorial Complex	June 8, 2000, Thursday

A total of 380 people attended the five community open houses:

- 81 at the Petersen Museum on Miracle Mile
- 88 at the Veterans Administration Hospital in West Los Angeles
- 93 at the Ken Edwards Center in the City of Santa Monica
- 39 at the California African American Museum in Exposition Park
- 79 at the Veterans Memorial Auditorium in the City of Culver City

5.3.2 Outreach Meetings

A total of 36 outreach meetings/briefings were conducted subsequent to the end of the scoping period, with various interested stakeholders to inform them of the study, elicit their feedback, and identify the issues of concern.

5.3.3 Summary of Scoping Comments

A total of 324 comment letters on the scope and content of the Draft EIR were received during the scoping period. A summary of the scoping comments and commentors is included to this section, while the following provides a brief summary of the primary issues raised by commentors during scoping.

- *Public Safety.* Members of the public expressed concern about the safety aspect of rapid transit, especially in residential areas, adjacent schools and at intersections, and indicated pedestrian safety at intersections and near schools as their most significant concern.
- *Environmental Issues (Noise and Vibration).* Participants commented on the potential for noise and vibration impacts both during construction and later during actual operation of the line.
- *Traffic and Parking.* Many commentors indicated a general concern, regarding how traffic flow patterns might change due to the line, both during construction and once operations began. There were specific questions about whether traffic around stations would increase, and whether parking would spill over into neighborhoods around stations.
- *Wilshire BRT.* Commentors indicated a desire to see detailed plans for mitigation related to the safety concerns raised at the community open houses. Noise and vibration mitigation suggestions include landscaping, "living sound walls," traditional sound walls, "child-safe" grade crossing and mitigation efforts similar to those used in Calgary, Alberta, Canada. Some commentors recommended grade-separations at all major streets or a combination of at-grade and grade-separated crossings. Also, an extension of the Red Line subway was frequently brought up, both in the community open houses and in the general comments.
- Loss of on-street parking
- Traffic diversion onto adjacent streets
- Pedestrian safety
- Impact on pedestrian friendly planning
- Concerns regarding traffic modeling and traffic impact methodology
- Signalization of cross-streets
- Loss of left-turn lanes
- Safety at grade separations
- Location of park & ride facilities
- Noise impact on areas adjacent to both routes

The scoping comments were distributed to the EIR technical consultants to ensure that the public's concerns were addressed, to the greatest extent feasible, and incorporated into the EIR discussion of impacts.

5.3.4 Agency Coordination

A number of government agencies and organizations with a vested interest in the development of a transit system have also commented on the project.

Scoping comment letters were received from the following agencies and organizations:

- City of Santa Monica, Office of the City Manager
- City of Culver City, Transportation Department

- City of Beverly Hills
- Los Angeles Memorial Coliseum Commission
- State of California, Governor's Office of Planning and Research, State Clearinghouse
- Native American Heritage Commission
- South Coast Air Quality Management District
- City of Los Angeles, Department of Recreation and Parks
- County of Los Angeles, Department of Recreation and Parks
- Southern California Association of Governments
- Southern California Gas Company
- Gabrieleno/Tongva Tribal Council
- Community Redevelopment Agency
- Los Angeles Unified School District

5.4 PUBLIC REVIEW OF THE ENVIRONMENTAL DOCUMENT

At the end of the public scoping period all comments were reviewed and work commenced on preparation of the Draft EIS/EIR in compliance with NEPA and CEQA, the public review period the Draft EIS/EIR was completed in April 2001 and commenced on April 6, 2001, and ended on June 15, 2001. During the public review period, the Draft EIR was placed in document repository sites to provide ongoing information about the project. Public hearings were also held to receive oral and written testimony on the Draft EIR from the public. In compliance with NEPA and CEQA, notice of the meetings was provided to the public well in advance of their occurrence. Consideration of the Draft EIR by the MTA Board of Directors occurred following the completion of three public hearings and the close of the public comment period.

On June 28, 2001, the MTA Board considered the findings of the DEIR as well as all public comments received and adopted a "Locally Preferred Alternative."

5.4.1 Public Hearings on the Draft EIS/EIR

Public hearings were held to provide the public with information regarding the findings of the Draft EIS/EIR and to receive formal comments. Comments on the Draft EIS/EIR were received from April 15, 2001, through the close of the comment period on Friday, June 15, 2001. Formal public hearings were held on the following meeting dates and at the specified locations:

- Monday, May 7, 2001, 5:00 P.M. to 8:00 P.M.
  Petersen Automotive Museum, Connor Pavilion
  6060 Wilshire Blvd., Los Angeles
- Wednesday, May 9, 2001, 5:00 P.M. to 8:00 P.M.
  West Los Angeles Church of God in Christ
  3045 Crenshaw Blvd., Los Angeles
- Tuesday, May 15, 2001, 5:00 P.M. to 8:00 P.M.
  Veteran's Administration Building, Room 1281
  11301 Wilshire Blvd., Los Angeles

A number of homeowners associations, neighborhood associations, and interest groups attended and submitted comments at each public hearing as well as mailed, faxed and e-mailed their comments. Most of the written comments came from individuals interested in the project but unable to attend one of the public hearings, or from individuals that desired to have a formal role in the process. In addition, each public hearing was presided over by an administrative law judge and public comments were received orally throughout the public hearing. A total of 477 persons attended the three public hearings and signed in. The following is a summary of attendance and oral comments received at each hearing:

- May 7, 2001
  Petersen Automotive Museum
  147 Attendees
  1 elected official representative
  44 verbal comments received
- May 11, 2001
  West Los Angeles Church of God in Christ
  80 Attendees
  4 elected official representatives
  35 verbal comments received
- May 15, 2001
  Veteran's Administration Building
  250 Total Attendees

5.4.2 Noticing for the Draft EIS/EIR

Various means were used to invite public comment on the project at formal public hearings. Notices were mailed to all stakeholders in the project database that included over 12,000 addresses including to homeowners associations and business interests, throughout the Mid-City/Westside Transit Corridor. This notice included all of the organizations listed in Table 5-2. In addition, letters and flyers were sent to the stakeholders throughout the Study Corridor, and leave behinds placed on MTA owned busses in the Study Corridor.

Notices were distributed to all of the organization in Table 5-2. Following is a description of notices distributed through the Web and local media:

- Placed community calendar articles in the *Larchmont Chronicle*, the *Los Angeles Times*, the *Sentinel*, the *Westside Weekly*, independent publications (i.e., *Wilshire*, *Westsider*, etc.)
- Contacted the following newspapers:
  - *The Wave*
  - *Brentwood Media Group* (Monthly)
  - *Downtown News*
  - *Jewish Journal*
  - *Korea Times*
  - *Santa Monica Mirror*
- Placed advertisements in the following newspapers:
  - *LA Times* (Our Times Editions)
  - *LA Times* (Southern California Living)

- *The Sentinel*
- *L.A. Independent*
- *Wilshire Independent*
- *Culver City Chronicle*
- *Westsider*

5.4.3 Summary of Comments on the Draft EIR

The following provides a brief summary of the primary issues raised in comments received during the Draft EIS/EIR comment period. This summary does not reflect each and every comment received, however, it captures the most common and regularly expressed comments.

Traffic and Parking

- Many comments expressed concern regarding existing traffic flow patterns and how changes would affect residential neighborhoods and businesses, both during construction and once operations began.
- Specific questions were raised about increased traffic around stations, and whether parking would spill over into neighborhoods around stations.
- The perceived negative effect of the loss of on-street parking for residents, shoppers, and businesses.
- The negative impact and lack of mitigation for the loss of left-turn lanes.
- The need for re-signalization of cross-streets to minimize the impact on residential neighborhoods.
- The need for pedestrian friendly planning and transit oriented development.
- The belief that the proposed project and mitigations are too costly and will not adequately address the mass transit needs of the area.
- The belief that a Wilshire BRT system will create more problems than it will solve.
- The need for an extension of the Red Line Subway instead of a Bus Rapid Transit system.

Public Safety

- Concern about the safety aspect of a curb or center lane rapid transit system, especially in residential areas, adjacent schools and at major intersections, and indicated pedestrian safety at intersections and near schools as their most significant concern.
- Concern regarding the loading and unloading of passengers in either the middle of the street or in close proximity to turning vehicles at the curb.
- The need for additional pedestrian safety mitigation measures due to the proximity of schools to the proposed route.

Environmental Issues

- Participants commented on the potential for noise and vibration impacts both during construction and later during actual operation of the BRT.
- The environmental impacts of more traffic congestion due to the loss of traffic lanes.
- Expressed a desire to see detailed plans that included proposed noise and vibration mitigations such as landscaping, bus shelters, and re-designed left and right turn lanes.

General

- Need of improved bus service for the disabled and individuals with limited mobility.
- Desire to relieve overcrowding on existing buses by building a BRT system.
- Close proximity to the Exposition LRT alignment.
- Need for improvements to the existing Wilshire bus service.
- Perceived inaccuracy of projections for ridership figures and related traffic relief/impacts.

The scoping comments were distributed to the Draft EIR technical consultants to ensure that the public's concerns were addressed, to the greatest extent feasible, and incorporated into the Final EIR discussion of impacts. Chapter 9.0 of this document responds to the comments received on the Draft EIR.

5.5 MTA BOARD ADOPION OF LOCALLY PREFERRED ALTERNATIVE

5.5.1 Environmental Process

Compliance with CEQA must be achieved before the proposed project can be approved. The goal of this legislative act is to ensure that local decision-makers are aware of the environmental consequences of a decision before it is made.

An extensive environmental review process has been conducted to date (the process completed prior to this Final EIR involved both federal and state environmental processes, therefore, some references below will include activities that were compliant with NEPA). Included in this process are the following:

- *Notice of Preparation (NOP)*—A notice of preparation of an EIR was prepared by MTA and circulated by the State of California EIR Clearinghouse on May 8, 2000.
- *Notice of Intent (NOI)*—A notice of intent to prepare an EIS was published in the Federal Register on May 19, 2000 (Vol. 65, No. 98). The NOI provided a brief description of the proposed project and invited comment on issues that would be addressed in the environmental document.
- *Public Scoping Workshops*—To invite public comment about the project, six workshops were held between May 23 and June 8, 2000, which were attended by more than 380 persons. Letters of invitation were mailed to over 12,000 addresses along the Wilshire and Exposition alignments. The 30-day public scoping comment period extended through June 23, 2000, and all comments received about the project were documented and reviewed as a part of the preparation of the Draft EIS/EIR. Additionally, MTA staff attended more than 42 community meetings with business, civic and homeowners associations during the scoping period and subsequent preparation of the Draft EIS/EIR. Results of this public outreach were presented to the MTA Board of Directors in February 2000.
- *Public Comment Period*—Following the release of the Draft EIS/EIR, a public comment period was held which extended from April 6, 2001 through June 15, 2001. The draft document was placed in public libraries and other repository sites as an effective way of providing ongoing information about the project. The document was also available on the MTA website (www.mta.net) and information about public hearings and other ongoing project activities was available via the project telephone line (310-366-6443). Public hearings were held on May 7, May 9, and May 15, 2001, to receive oral and written testimony on the Draft EIS/EIR from the general public. A total of more than 600 persons attended these hearings. The

MTA provided notice of these public involvement meetings in compliance with CEQA and NEPA. For a detailed description of the environmental review process, and project-related public involvement opportunities, refer to the Community Participation section of the Final EIR.

- *Responses to Comments*—Responses and to all comments on the Draft EIS/EIR were compiled subsequent to the public comment period and incorporated into the Final EIR. Please refer to the full Final EIR for a full presentation of comments and responses.
- *MTA Board Actions*—The MTA Board took action on June 28, 2001, on several elements of the project. First, the Board adopted separate Locally Preferred Alternatives (LPAs) for the Wilshire Bus Rapid Transit (BRT) Route and for the Exposition Light Rail Transit (LRT) Route. The Board also gave the directive that the Exposition LRT Route be addressed in a separate environmental document to be released following completion of preliminary engineering design and studies for that specific transit route. Therefore, the LPA described in this Final EIR focuses on the implementation of a BRT Project along the Wilshire BRT Route only.

The Board also directed staff to consider a curb-lane BRT operation. The Wilshire BRT median and median-adjacent alternatives were eliminated from further consideration due to the significant impacts associated with them and the issues raised during the public comment period regarding these impacts. The Curb-Lane LPA for the Wilshire BRT Route significantly reduces these impacts. In particular, there are no longer any significant impacts associated with the removal of landscaped medians, the removal of on-street parking, or the impact to left-turns.

The MTA Board further specified that any dedicated bus lanes should not be implemented as a component of the project unless approved by the local City or County jurisdiction. To date, no such approvals have been granted, however, MTA staff will continue to work with each city to determine possible segments of the route where such lanes may be feasible. Peak period, dedicated bus lanes would initially be tested on a demonstration basis in the A.M. peak (7:00 A.M. to 9:00 A.M.), prior to the opening of most stores and businesses. If successful after such trials, the program would be considered in the P.M. period (4:00 P.M. to 7:00 P.M.), and along additional segments of Wilshire Boulevard.

The project cannot be implemented until the Final EIR is certified with all necessary mitigation measures and an adopted Mitigation Monitoring Program. Following certification of the EIR by the MTA Board, the State Clearinghouse will consider the Final EIR and a Notice of Completion (NOC) will be filed for the project.

5.5.2 Resolution of Issues

The MTA Board took the actions described above after consideration of the areas of controversy and issues raised by the public and identified in the Draft EIS/EIR. The issues of concern identified by public comments to the Draft EIS/EIR included: the conversion of two mixed flow traffic lanes to 24-hour dedicated bus lanes; the removal and reconstruction of existing landscaped medians; the removal of on-street parking in Los Angeles and Beverly Hills; the removal of on-street parking in Santa Monica; the removal of left turn pockets; and possible street widening. Each of these issues is discussed below.

■ Issue #1: Landscaped Median Islands

Business leaders in the Wilshire Center, Miracle Mile, and Beverly Hills areas of the Corridor were concerned that the median-running BRT alternative would require the removal and reconstruction of the landscaped medians in the middle of Wilshire Boulevard.

Resolution

The MTA Board, by adopting the curb-lane BRT project, acknowledged this issue and selected an alternative that would not require the removal and/or reconstruction of the landscaped medians.

■ Issue #2: Removal of On-Street Parking in Los Angeles and Beverly Hills

Business and community leaders expressed opposition to the dedicated transit lanes because they would eliminate most of the on-street parking spaces along Wilshire Boulevard. These parking spaces are used by residents and businesses and were cited to be an important community asset that should not be removed.

Resolution

The MTA proposal has been revised to now only consider dedicated bus transit lanes only during peak-periods. During non-peak periods and weekends, on-street parking could remain as it is today. Parking along most segments of Wilshire Boulevard in Los Angeles and Beverly Hills is currently prohibited during peak-periods, and therefore no impact would occur in all but two locations:

Westwood

Residents in this community between Comstock and Selby Avenues requested that no parking be removed in this area and that dedicated transit lanes not be considered. This segment of Wilshire Boulevard is the only segment of Wilshire Boulevard in which transit buses do not experience delay due to traffic congestion and therefore no significant benefit was felt to exist from the dedicated transit lanes. Following review of transit speeds, MTA staff concurs with the residents' position and is therefore not recommending any further consideration of dedicated transit lanes in this segment of the boulevard. Buses in this area are recommended to run in mixed-flow traffic.

West Los Angeles

On-street metered parking is still allowed during A.M. and P.M. peak periods in one segment of Wilshire Boulevard in West Los Angeles between Centinela and Federal Avenues. A total of 167-metered parking spaces are located in this area, which would be removed from service during peak periods (7:00 A.M. to 9:00 A.M. and 4:00 P.M. to 7:00 P.M.) if a dedicated transit lane were implemented in the curb lane. These spaces would not be affected during off-peak and weekend periods. Because of this, MTA is proposing to test an A.M.-peak period operation in this area when use of the metered parking spaces is low. During the 7:00 A.M. to 9:00 A.M. period, very few businesses are

open and only about 30 percent of the spaces are actually used. Sufficient metered parking exists on side streets during this time to accommodate any displaced parking.

■ Issue #3: Removal of On-Street Parking in Santa Monica

Community meetings in Santa Monica indicated a strong objection to the relocation of 509 on-street parking spaces in that city. In addition, the mitigation measure of operating only in the peak hours proposed to reduce impacts in LA and Beverly Hills would not eliminate the impact to parking in Santa Monica since parking is permitted on a 24-hour basis.

Resolution

In recognition that both a 24-hour and a peak-hour-only BRT system would significantly impact on-street parking in Santa Monica, the project has been defined to operate only in mixed-flow configuration in the City of Santa Monica. This means that the buses would travel in the mixed traffic lanes, with other vehicles, and would not operate in the curb lane where cars are parked, except to pull in and out of stations. A total of nine parking spaces are now proposed to be relocated to provide for BRT Stations in the City of Santa Monica, instead of the 509 spaces that were previously proposed.

■ Issue #4: Removal of Left-Turn Pockets

The median alternative would have required vehicles to cross over the exclusive Busway lanes to turn left. Arrows and special signal phases would have been required to insure safe turns. The left turn signals, however, would have removed green time that is needed to provide signal priority for buses on Wilshire, effectively eliminating any signal priority for the buses and one of the major benefits of the proposed project. The median-adjacent alternative would have required "permissive" left-turn pockets, where vehicles would cross one direction of the bus lane prior to reaching the intersection, thereby not requiring a dedicated left-turn signal. However, the City of Los Angeles Department of Transportation (LADOT) indicated that such permissive turns would not be advisable.

Resolution

The adoption by the MTA Board of the curb-lane BRT project eliminated the need for the removal of any left-turn pockets.

■ Issue #5: Possible Street Widening

The median and median-adjacent alternatives would have required that certain segments of Wilshire Boulevard be widened in station areas to allow for the installation of the platforms in the median of the street.

Resolution

The adoption of the curb-lane alternative would not require street widening since the stations would be located alongside the curb and not in the median of the street.

■ Issue #6: Dedicated Bus Lanes

Business owners, as well as representatives from the cities along the Corridor, were concerned that a 24-hour, exclusive-lane BRT project requiring the loss of two traffic lanes along Wilshire Boulevard would not only reduce the carrying capacity of the street but would also cause a redistribution of traffic to other streets.

Resolution

In recognition of this concern, the MTA Board adopted the curb-lane, peak-hour only BRT alternative, subject to approval by each city and/or jurisdiction, this BRT alternative would operate in an exclusive lane, which would require the conversion of a mixed flow traffic lane in each direction to a dedicated bus lane. However, the use of this lane for transit would only occur during substantially reduced hours (five hours per day versus the original plan of 24 hours per day). An exclusive lane is not proposed in the City of Santa Monica where the project would operate in mixed flow traffic lanes. Also see previous discussion of segment between Comstock and Selby Avenues under Issue #2.

5.6 AGENCY OUTREACH IN SUPPORT OF FINAL EIR

Following the close of the Public Comment Periods and Action of the MTA Board on June 28, 2001, the project design was advanced through Preliminary Engineering (see FEIR Volume II for engineering design). As described in Section 2.0, the LPA was modified in response to community concerns to reduce or eliminate impacts of the project. Coordination with the City of Los Angeles Department of Transportation was held to develop suitable design for a peak-period lane demonstration. Coordination meetings were held between the engineering staff, urban designers, environmental consultants, and the MTA staff to provide responses to all comments (see Section 8.0).

5.7 RELEASE AND CERTIFICATION OF FINAL EIR

Upon completion of the Final EIR, consisting of all substantive public comments received, responses to those comments, and the revised EIR, the document will be placed in repository sites as indicated in Section 8.0 to provide ongoing information about the project. In compliance with CEQA, notice of hearings regarding certification of the document will be provided. Since circulation of the Draft EIR, the Metropolitan Transportation Authority (MTA) Board of Directors elected to separate the project into two distinct projects: the Wilshire BRT (the subject of this Final EIR) and the Exposition LRT (which will be analyzed in a separate environmental document). In order to encourage public participation and effective communication, notices regarding the availability of the Final EIR will be made available to all previously contacted stakeholders associated with the Wilshire portion of the corridor.

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6.3 HISTORICAL MAPS

USGS 15' Sawtelle Quadrangle, 1934

USGS 15' Sawtelle Quadrangle, 1925

USGS 15' Topanga Canyon Quadrangle, 1928 (1932)

USGS 15' Hollywood Quadrangle, 1926

Address ranges on Wilshire:

Los Angeles (3780 at Western to 6067 at Fairfax)

Beverly Hills, (8423 at San Vicente to 9634 at about Roxbury)

Santa Monica (101 at Ocean to 1215 at about Euclid)

(Missing segments: 6067/Fairfax to 8423/ San Vicente; 9634/Roxbury to about 13000/Centinela and SM 3300/Centinela to 1215 at about Euclid)

6.4 SUPPORTING TECHNICAL DOCUMENTS

Transit Network Assumptions. Korve Engineering, and Manuel Padron & Associates, Inc.

Cultural Resources Technical Report. Greenwood and Associates, October 9, 2000.

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Air Quality Construction and Operation Data Sheets. Terry A. Hayes & Associates.

Traffic Technical Report. Meyer, Mohaddes Associates, Inc.

Scoping Materials and Comments. The Robert Group, and Consensus Planning Group.

7.0 LIST OF PREPARERS

EIP Associates (EIP) and Terry A. Hayes Associates (TAHA) prepared the environmental analysis contained in this document under contract to Korve Engineering (prime consultant) and the Los Angeles County Metropolitan Transportation Authority (MTA). The effort was supported by a grant from the State of California Transportation Congestion Relief Program (AB 2928).

The following persons listed in Table 7-1 were directly involved in the preparation of this document. It is recognized that no one individual can be an expert in all of the environmental analyses presented in this EIR. Consequently, an interdisciplinary team, consisting of technicians and experts in various issue areas, was required to prepare and complete this study. Table 7-1 provides a list of EIR preparers.

Table 7-1 List of Document Preparers

Name	*Project Role*
MTA—Lead Agency	
Roger Snoble	Chief Executive Officer
James de la Loza	Executive Officer, Countywide Planning & Development
Carol Inge	Deputy Executive Officer
David Mieger	Project Director and Project Manager
Timothy Papandreou	Deputy Project Manager
Anthony Loui	Project Planner
Hitesh Patel	Engineering Project Manager
Rick Wilson	Project Controls & Schedules
Chaushie Chu	Director, Systems Analysis & Research
Brian Boudreau	Director, Capital Planning/Grant Funding
Ron Smith	Financial Programming
Velma Marshall	Director of Real Estate
Korve Engineering—Engineering and Design	
John Stutsman	Consultant Project Manager
Pete Zimmerman	Project Engineer
Tony Wang	Traffic Engineer
Joaquin Siques	Safety
Narasimha Murthy	Traffic Simulation
Sunil Rajpal	Traffic Simulation
Salvador Cortez	Graphics

Table 7-1 List of Document Preparers

Name	Project Role
EIP Associates—Environmental Consultant	
Terri Vitar	Project Manager, Natural Resources Issues
Rod Jeung	Project Manager, Planning and Environmental Issues
Alison Rondone	Assistant Project Manager
Susan ZagRodny	Land Use and Development
Mark Horne	Visual Resources
Elwood Tescher	Urban Design, Land Use
Rhett Beavers	Urban Design, Land Use, Environmental Justice
Steve Gerhardt	Land Use, Policy Consistency
Neill Brower	Cultural Resources
Robert Chihade	Urban Design, Land Use
Conni Pallini	Land Use
Scott Debauche	Socio-Economics, Environmental Justice
Harriet Lai Ross	Construction Impacts
Scott Wirtz	Visual Resources & Community Facilities
Patrice Siefers	Socioeconomics & Environmental Justice
Martin Ruane	Environmental Analyst
Banafsheh Khorram	Environmental Analyst
Joel Miller	Word Processing, Editing, and Document Production
Jessica Crete	Word Processing and Document Production
Benjamin Frandsen	Word Processing and Editing
Pedro Vitar	Document Production
Terry A. Hayes & Associates—Environmental Consultant	
Terry A. Hayes	Project Manager, Air Quality, Energy, Land Acquisition
Elizabeth Atwell	Alternatives Considered
Manuel Padron & Associates, Inc.—Traffic Modeling	
Manuel Padron	Transit Running Times
Susan Rosales	Performance Measures, Transit Network Plans
Bruce Emory	Transit Operating Statistics
Dennis Markham	Operating and Maintenance Costs
Meyer, Mohaddes Associates, Inc.—Traffic and Parking	
Michael Meyer	Traffic and Parking
Viggen Davidian	Traffic and Parking
David Kennedy	Traffic and Parking

Table 7-1 List of Document Preparers

Name	Project Role
Harris Miller Miller & Hanson, Inc.—Noise and Vibration	
Hugh J. Saurenman	Project Manager, Noise and Vibration
David A. Towers	Deputy Project Manager, Noise and Vibration
Kyle W. Donnelly	Noise Impact Analyst
Katherine S. Baus	Vibration Impact Analyst
The Robert Group—Community Outreach	
Christine M. Robert	Community Outreach Manager
Clarissa Filgioun	Community Outreach Planner
Ginny-Marie Case	Database Augmentation and Maintenance
Consensus Planning Group—Community Involvement	
Julie Gertler	Community Outreach Manager
Anthony Crump	Community Outreach Manager
Suisman Urban Design—Urban Design	
Doug Suisman, F.A.I.A.	Urban Design, Station and Vehicle Concepts
Melendrez Design Partners—Urban Design	
Deborah Murphy, F.A.I.A.	Landscape Design, Stations and Parking Facilities

8.0 DISTRIBUTION LIST

In accordance with the California Environmental Quality Act (CEQA), notification of release of the Final Environmental Impact Report (FEIR) was distributed to the public in the following manner:

- Copies of the FEIR were sent to the required federal, State, and local agencies listed below.
- Executive Summaries of the FEIR were mailed to more than 1,600 individuals on the project mailing list.
- Advertising was placed in the *Los Angeles Times* and *La Opinion* newspapers.
- MTA website (www.mta.net) offered free download of the Executive Summary and the FEIR.
- Printed copies were provided to the libraries listed in Section 8.5.

8.1 FEDERAL AGENCIES

Federal Highway Administration
U.S. Environmental Protection Agency
U.S. Army Corps of Engineers
U.S. Fish and Wildlife Service
Department of the Interior, Office of Environmental Affairs
Federal Emergency Management Agency
Department of Health and Human Services
Department of Housing and Urban Development
Department of Energy
Federal Railroad Administration
U.S. Department of Transportation, Environmental Division
Advisory Council on Historic Preservation

8.2 STATE AGENCIES

Department of Conservation
Department of Fish and Game
Regional Water Quality Control Board
California Department of Transportation
Los Angeles Unified School District
California Department of Housing and Community Development
State Clearinghouse, Office of Planning and Research
Office of Historic Preservation, California Park and Recreation Department
California Air Resources Board
Division of Mining and Geology
California Department of Parks and Recreation
California Public Utilities Commission
California Department of Health Services
Native American Heritage Commission
State Lands Commission

California Energy Resources Commission
California Department of Education
California Department of General Services
California Department of Water Resources
California Joint Legislative Audit Committee
California Office of Public Assistance, State Clearinghouse
California Resource Agency
California Department of Transportation (Caltrans)
State Library, Government Publications Section
California Transportation Commission
Los Angeles Community College District

8.3 REGIONAL AGENCIES

Southern California Association of Governments
South Coast Air Quality Management District
Metropolitan Water District of Southern California
Southern California Gas Company

8.4 LOCAL AGENCIES

8.4.1 Los Angeles County

Department of Public Works
Library Department

8.4.2 City of Beverly Hills

Anton Dahlerbruch, Transportation Department

8.4.3 City of Culver City

Stephen Cunningham, Transportation Department

8.4.4 City of Santa Monica

Susan McCarthy, City Manager
Suzanne Frick, Planning & Community Development
Stephanie Negriff, Big Blue Bus

8.4.5 City of Los Angeles

Wayne Tanda, General Manager Department of Transportation
James Okazaki, Department of Transportation
Haripal Vir, Department of Transportation
Susan Bok, Department of Transportation
Sean Skehan, Department of Transportation
Community Redevelopment Agency

8.5 PUBLIC LIBRARIES

Los Angeles MTA
One Gateway Plaza
15th Floor
Los Angeles, CA 90012

Los Angeles County Law Library
301 W. First St.
Los Angeles, CA 90012

City of Beverly Hills Library
444 N. Rexford Dr.
Beverly Hills, CA 90210

City of Culver City Library
4975 Overland Ave.
Culver City, CA 90230

City of Santa Monica Main Library
1343 Sixth St.
Santa Monica, CA 90401

City of West Hollywood Library
715 N. San Vicente Boulevard
West Hollywood, CA 90069

City of Los Angeles Libraries:

Central Library
630 W. 5th St.
Los Angeles, CA 90071

Wilshire Library
149 N. Saint Andrews Pl.
Los Angeles, CA 90004

Fairfax Library
161 S. Gardner St.
Los Angeles, CA 90036

West Los Angeles Regional Library
11360 Santa Monica Blvd.
West Los Angeles, CA 90025

Brentwood Library
11820 San Vicente Blvd.
Brentwood, CA 90049

University of California, Los Angeles Library
220 Powell Building
Los Angeles, CA 90095

9.0 RESPONSES TO COMMENTS ON THE DRAFT EIR

This chapter responds to comments provided during the public review period for the Mid-City/Westside Transit Corridor Draft Environmental Impact Statement/Environmental Impact Report (EIR). Since circulation of the Draft EIR, the Metropolitan Transportation Authority (MTA) Board of Directors elected to separate the project into two distinct projects –the Wilshire Bus Rapid Transit (BRT) Project and the Exposition Light Rail Transit (LRT) Project. This Final EIR addresses only the public comments made relative to the Wilshire BRT. The MTA has determined that the Exposition LRT will be reviewed and evaluated as a separate project. Changes in the Project Description since release of the Draft EIR are summarized below and described in greater detail in the Executive Summary of this document.

9.1 CHANGES IN THE PROJECT DESCRIPTION SINCE RELEASE OF THE DRAFT EIR

On June 28, 2001, the MTA Board of Directors adopted Alternative 3 (Combination of the Wilshire Bus Rapid Transit (BRT) and the Exposition Light Rail Transit (LRT) as the Locally Preferred Alternative (LPA) from the three alternatives studied in the Draft EIR. However, as previously mentioned, the Wilshire BRT and Exposition LRT projects will be evaluated in two separate Final EISs/EIRs.

With respect to the Wilshire BRT, which is the subject of this environmental document, the LPA route extends from the current terminus of the Metro Red Line at Wilshire/Western to Downtown Santa Monica, over a distance of approximately 15 miles. The BRT project will expand upon the success of the Metro Rapid Wilshire/Whittier Line #720, which opened for service along Wilshire Boulevard in June 2000. In summary, the BRT enhancements will include additional signal priority, reconstructed curb lanes in segments of the route to provide level street surfaces, larger low-floor buses to carry more people, and segments of peak period dedicated bus lane operation, where feasible. New station shelters will be constructed to allow multiple-door boarding and alighting from the buses, and new vending and security equipment will be provided. Additionally, an expanded bus storage and maintenance yard is planned in the downtown Los Angeles area to accommodate the fleet of approximately 100 new oversized transit vehicles for the line. The MTA owned existing parking facility at Wilshire Boulevard and La Brea would be improved as part of an overall transportation and urban design benefit. The MTA owned existing parking facility at Wilshire Boulevard and Crenshaw would be improved as part of an overall transportation and urban design benefit.

Due to the changes in the proposed project since circulation of the Draft EIR, some, but not all, aspects of the project require a Final EIR. Several aspects of the project are exempt from CEQA, e.g., increasing transit service on existing routes (Section 21080(b)(10)), and restriping (Section 21080.19). However, significant and unavoidable impacts remain in the areas of traffic and construction impacts, and the MTA will continue to utilize the EIR format to complete the environmental review process already underway.

9.2 PUBLIC REVIEW PROCESS

The Draft EIR was distributed to various public agencies, citizen groups, and interested individuals for a public review period, which began on April 13, 2001 and ended on June 15, 2001. The Draft EIR was circulated to State agencies for review through the State Clearinghouse, Office of Planning and Research, and directly to the appropriate federal and local agencies. During the review period, the public was provided with the opportunity to submit written comments on the Draft EIR. Notice of the availability of the Draft EIR was published in the *Los*

Angeles Times, Los Angeles Opinion, The Sentinel, L.A. Independent, Wilshire Independent, Culver City Chronicle, Westsider, South of Robertson Newsletter, St. Andrews Homeowners Association Newsletter, Larchmont Chronicle, the Westside Weekly, The Wave, Brentwood Media Group, Downtown News, Jewish Journal, Korea Times, and the *Santa Monica Mirror.*

Copies of the Draft EIR were also made available at the following libraries:

Beverly Hills Library
444 North Rexford Drive
Beverly Hills, CA 90210

Brentwood Library
11820 San Vicente Boulevard
Brentwood, CA 90049

Central Library
630 West 5th Street
Los Angeles, CA 90071

Crenshaw-Imperial Library
11141 Crenshaw Boulevard
Inglewood, CA 90303

Culver City Library
4975 Overland Avenue
Culver City, CA 90230

Exposition Park Regional Library
3665 South Vermont Avenue
Los Angeles, CA 90007

Fairfax Library
161 South Gardner Street
Los Angeles, CA 90036

Palms-Rancho Park Library
2920 Overland Avenue
Los Angeles, CA 90064

Pio Pico Koreatown Library
695 South Serrano Avenue
Los Angeles, CA 90005

Robertson Branch Library
1719 South Robertson Boulevard
Los Angeles, CA 90035

Santa Monica Main Library
1343 6th Street
Santa Monica, CA 90401

Santa Monica Fairview Branch
2101 Ocean Park Boulevard
Santa Monica, CA 90404

Fairview Library
2101 Ocean Park Boulevard
Santa Monica, CA 90405

Jefferson Library
2211 West Jefferson Boulevard
Los Angeles, CA 90018

Los Angeles County Law Library
301 West 1st Street
Los Angeles, CA 90012

Mar Vista Library
12006 Venice Boulevard
Los Angeles, CA 90066

Masao W. Satow Library
14433 Crenshaw Boulevard
Los Angeles, CA 90249

Memorial Library
4625 West Olympic Boulevard
Los Angeles, CA 90019

Ocean Park Library
2601 Main Street
Santa Monica, CA 90405

View Park Library
3854 West 54th Street
Los Angeles, CA 90043

Washington Irving Library
1803 South Arlington Avenue
Los Angeles, CA 90019

West Los Angeles Regional Library
11360 Santa Monica Boulevard
West Los Angeles, CA 90025

Wilshire Library
149 North St. Andrews Place
Los Angeles, CA 90004

The Executive Summary was translated into Spanish and made available to anyone requesting a copy.

9.3 CONTENTS AND ORGANIZATION OF THE FINAL EIR

This Final EIR is composed of two volumes, as follows:

Volume I This volume contains the Draft EIR and technical appendices, revised to reflect the LPA. The Draft EIR contains a revised project description contained within the Executive Summary; describes existing environmental resources on the project site and in the vicinity of the project site; analyzes potential impacts on those resources due to the proposed project; identifies mitigation measures that could avoid or reduce the magnitude of significant impacts; evaluates cumulative impacts that would be caused by the project in combination with other future projects or growth that is expected in the region; analyzes growth-inducing impacts; and provides a full evaluation of the alternatives to the proposed project that could eliminate, reduce, or avoid project-related impacts.

Volume I also contains the Responses to Comments on the Draft EIR. It contains an explanation of the format, content, and use of the Final EIR; a complete list of all persons, organizations, and public agencies that commented on the Draft EIR; all substantive comments received and the Lead Agency's responses to those comments. A database setting forth a list of all comments received is included following the Response to Comments section, indicating the type of response given to each comment received. Only substantive comments and their responses are provided in this document.

Volume II Engineering Drawings: this volume contains the preliminary engineering drawings for the curb lane reconstruction between Western Avenue and San Vicente Boulevard. It also contains standard drawings for bus shelters at thirty locations and conceptual design for the Downtown Bus Division expansion and parking facilities at Wilshire/La Brea and Wilshire/Crenshaw.

9.4 STATUTORY REQUIREMENTS

9.4.1 CEQA

Before approving a project, the California Environmental Quality Act (CEQA) requires the Lead Agency, in this case the MTA, to prepare and certify a Final Environmental Impact Report (Final EIR). The contents of a Final EIR are specified in Section 15132 of the CEQA Guidelines, which states that:

> The Final EIR shall consist of:
>
> (a) The Draft EIR or a revision of the Draft.
>
> (b) Comments and recommendations received on the Draft EIR either verbatim or in summary.
>
> (c) A list of persons, organizations, and public agencies commenting on the Draft EIR.
>
> (d) The responses of the Lead Agency to significant environmental points raised in the review and consultation process.
>
> (e) Any other information added by the Lead Agency.

The Lead Agency must provide each public agency that commented on the Draft EIR with a copy of the Lead Agency's response at least 10 days before certifying the Final EIR. In addition, the Lead Agency may also provide an opportunity for members of the public to review the Final EIR prior to certification, though this is not a requirement of CEQA.

9.5 USE OF THE FINAL EIR

9.5.1 CEQA Requirements

After completing the Final EIR, and before approving the project, the Lead Agency must make the following three certifications, as required by Section 15090 of the CEQA Guidelines:

- That the Final EIR has been completed in compliance with CEQA
- That the Final EIR was presented to the decision-making body of the Lead Agency, and that the decision-making body reviewed and considered the information in the Final EIR prior to approving the project
- That the Final EIR reflects the Lead Agency's independent judgment and analysis

These certifications, the Findings of Fact, and the Statement of Overriding Considerations (the latter two of which are described further below) are included in a separate Findings document. Both the Final EIR and the Findings are submitted to the MTA for consideration of the proposed project.

Pursuant to Section 15091(a) of the CEQA Guidelines, if an EIR that has been certified for a project identifies one or more significant environmental effects, the public agency must adopt "Findings of Fact." For each significant impact, the lead agency must make one of the following findings:

(1) Changes or alterations have been required in, or incorporated into, the project which avoid or substantially lessen the significant environmental effect as identified in the EIR.

(2) Such changes or alterations are within the responsibility and jurisdiction of another public agency and not the agency making the finding. Such changes have been adopted by such other agency or can and should be adopted by such other agency.

(3) Specific economic, legal, social, technological, or other considerations, including provision of employment opportunities for highly trained workers, make infeasible the mitigation measures or project alternatives identified in the final EIR.

Each finding must be accompanied by a brief explanation of the rationale for the finding. In addition, pursuant to Section 15091(d) of the CEQA Guidelines, the agency must adopt, in conjunction with the findings, a program for reporting on or monitoring the changes that it has either required in the project or made a condition of approval to avoid or substantially lessen environmental effects. These measures must be fully enforceable through permit conditions, agreements, or other measures. This program is referred to as the Mitigation Monitoring Program.

When a Lead Agency approves a project that would result in significant, unavoidable impacts that are disclosed in the Final EIR, the agency must, pursuant to Section 15093(b) of the CEQA Guidelines, state in writing its reasons for supporting the approved action. This Statement of Overriding Considerations must be supported by substantial information in the record, which includes this Final EIR. Since the proposed project would result in significant, unavoidable impacts, the MTA would be required to adopt a Statement of Overriding Considerations prior to approving the proposed project. This statement is not a substitute for the Findings of Fact described above.

9.6 RESPONSES TO WRITTEN PUBLIC COMMENTS

In total, 5,515 written and oral comments were provided by various governmental agencies, homeowner groups, organizations, and individuals. Included in this section is Appendix A (List of Persons, Organizations, and Public Agencies Commenting on the Draft EIR for the Mid-City/Westside Transit Corridor Project), which provides a comprehensive list of commentors. In addition, a second database, Appendix B (Comprehensive List of Comments and Type of Response Provided), provides the comment number and the type of response given to each comment (i.e., individual, topical, or standard, as further described below).

Two types of responses are provided to substantive comments: topical responses and individual responses. Topical responses are provided for broad issue areas where there were multiple public comments. Individual, or specific, responses are provided for each substantive written comment that raises a specific issue within the scope of the environmental analysis. A response to an individual comment may (1) stand alone, (2) refer to a topical response, (3) refer to a previous individual response, or (4) refer to any combination thereof. The complete text of the substantive comments and the Lead Agency's responses are provided in this section.

Where a comment does not raise a significant environmental issue or is outside the scope of the environmental review process or the project, a standard response is provided. Standard responses are provided in Appendix B and, accordingly, are entered into the administrative record for the project. Reasoned, factual, good faith responses have been provided to all comments received. The written response to the substantive comments describes the disposition of significant environmental issues that were raised by the commentors, as required by Sections 15088(a) and 15088(b) of the CEQA Guidelines and 40 CFR Sections 1502.9(b) and 1503.4(b).

As part of the record, the comments and responses will be forwarded to the decision-makers for their consideration of the proposed project. Generally, the responses to comments provide explanation or amplification of information contained in the Draft EIR. A complete administrative copy of all comment letters with responses to each comment received, including those with standard responses, is on file at and is available for review at the MTA Headquarters, Records Management Department, One Gateway Plaza, Los Angeles, California 90012.

9.6.1 Topical Responses

As previously noted, topical responses are provided for broad issue areas where there were multiple public comments. Three topical responses are provided, which include Topical Response A (Impacts to On-Street Parking), Topical Response B (Loss of a Travel Lane), Topical Response C (Effects of Design Options [e.g., Left Turn Prohibitions]), and Topical Response D (Major Investment Study). The following section includes a list of all comments that refer exclusive to a Topical Response, followed by the Topical Response itself. However, in some cases, an individual response, which is provided in Section 11.6.2, may also include a reference to a Topical Response.

■ Topical Response A: Impacts to On-street Parking

LAUSD (5)-32 Please consider whether speed bumps may also be needed to mitigate traffic which is diverted onto Wilton Place adjacent to Wilton Place Elementary School. Vehicles already travel at high speed on this street, and the Draft EIR anticipates that the Wilshire BRT, by removing one lane from Wilshire Boulevard, will generate a significant amount of traffic on side streets. Additionally, or at the minimum alternatively, a crossing guard should be provided for this very busy street during hours that children arrive and depart from school. Other District schools may need mitigation if diverted traffic becomes a problem.

CLA (1)-27 Spillover parking impacts on surrounding neighborhoods due to the removal of on-street parking will be significant. An inventory of off-street parking facilities needs to be done and analyzed with respect to expected demand after removal of on-street to be considered "replacement parking," and the two replacement parking lots totaling 287 spaces are inadequate to compensate for all the spaces lost on Wilshire Boulevard. All this combined with parking relocation could adversely impact adjacent commercial and residential uses.

CLA (1)-39 The EIR/EIS should also discuss the potential costs to retail and service businesses along the alignments due to the loss of on-street parking. Replacement parking in other locations will not provide the same level of

customer accessibility, resulting in potentially substantial business losses. While it may be infeasible to estimate actual costs, this impact should at least be discussed in qualitative terms.

CLA (3)-22 Parking: The project will assume one-to-one replacement of parking with off-street facilities, including park-and-ride. The SEIS/SEIR should disclose exactly how many spaces will be removed, distance of replacement facilities, from original locations, impacts form the construction and operation of replacement facilities, socio-economic impacts on businesses form the displacement of existing parking spaces, and impacts from spillover parking on surrounding neighborhoods. Mitigation measures should include on-street replacement parking if feasible.

ANK (1)-3 I don't want the median destroyed after all the monies [sic] that have been spend to beautify the mile.

ANK (1)-4 I do not want parking meters removed: We just [got] them back!

ANON (12)-3 Also, I am concerned about inadequate parking if we lose a parking lane on Wilshire. According to the plan, the MTA may be forced to purchase property adjacent to Wilshire Blvd.

CAF (1)-2 1) The heavier traffic on Wilshire Blvd. and the removal of left turn pockets and the removal of parking spaces.

CK (1)-3 However, the loss of street parking is problematic, even with space replacement in parking structures, on a long, wide boulevard like Wilshire which doesn't particularly lend itself to pedestrian uses and shopping in the way other areas which utilize parking structures function (e.g. Third Street Promenade in Santa Monica, Old Pasadena).

FG (1)-2 I feel the best mass transit solution is one that runs on its own right-of-way and does not take away street parking. Removing street parking on Wilshire will impact parking in surrounding neighborhoods and lack of parking could impact businesses Los Angeles once had a successful light rail system, four routes of which ran to Santa Monica, and I would like to see a rail system return to that city

Topical Response A: Alternatives that had previously been considered would have resulted in a parking impact due to the removal of on-street parking along Wilshire Boulevard and the Draft EIR proposed off-street replacement parking or peak-period-only operations as measures to mitigate this impact. The proposed project will be implemented in the peak periods only. Parking is already prohibited along most of Wilshire Boulevard during the peak periods, so there will be limited or no impact to on-street parking during peak periods. No parking spaces or parking meters that are currently available during off-peak time periods will be removed. In Santa Monica, where parking is currently permitted during peak-hours, the proposed project will run the BRT in mixed flow, similar to the existing Metro Rapid Bus, so there will be no impact to parking in the City of Santa Monica due to any bus lane. Approximately nine (9) spaces would be removed for new Metro Rapid Stations at 4th and 14th Streets and funding would be provided to the City to provide replacement parking off street. Outside of Santa Monica, there is only one segment of Wilshire Boulevard where parking is still permitted in the peak period. In the one-mile segment in West Los Angeles between Centinela and Federal, 167 metered parking spaces are available for use on a 24-hour basis. It is estimated that sidestreet metered parking is available in the A.M. peak period (7:00 A.M.–9:00A.M.) to satisfy any spaces displaced on Wilshire Boulevard. Restriction of parking in the peak hour would be consistent with regulations enforced throughout the remainder of the corridor which prohibit parking in rush-hour periods.

Topical Response B: Loss of a Travel Lane

WHA (1)-2 We support the concept of improved transportation in the Westside. Nonetheless, a dedicated bus lane between Beverly Hills and the San Diego Freeway is <u>not</u> an improvement, and we are opposed to it. We are Wilshire Corridor adjacent residents and are frightened at the prospect of even greater imprisonment though creation of

bottlenecks at the westerly and easterly boundaries of Westwood through the reduction to only two lanes of automobile travel

WHA (1)-3 *The reduction at Westwood Boulevard from four lanes at present to three, and from Veteran to the 405 freeway from three lanes to two is likely to affect seriously the traffic to and from UCLA for intersections which have already earned the title of most heavily traveled.*

ALC (1)-4 *Eighth Street in the Miracle Mile is already becoming a dangerous & accident ridden street. Diverting traffic off Wilshire & onto Eighth will create a hazard in our neighborhood.*

ANON (12)-4 *These buildings define our neighborhood and set it apart from others in the city, through their attention to detail an diverse use of period style. These buildings help define the character of Los Angeles, and certainly of the Miracle Mile itself. To lose any of these structures to parking lots would be a crime.*

BRR (1)-2 *I would be in favor of this corridor ONLY if it preserves the existing nature of the Miracle Mile area (wide boulevard, attractive median, etc.) and it does not end diverting more dangerous traffic off the main artery (Wilshire) onto surrounding streets, which are not designed to handle that much traffic.*

CAF (1)-3 *2) The diversion of traffic from Wilshire Blvd. onto adjoining streets. This would naturally divert traffic onto Sixth Street, which is not capable of any heavier traffic. Sixth Street goes directly through the residential area. Heavier traffic on Sixth Street would be disturbing and dangerous to we residents, as well as reduce our property values. Cars already speed on Sixth Street, but heavier traffic would be a disaster.*

CE (1)-11 *"III. While they do not affect my immediate neighborhood, it is my belief that every reduction in the number of traffic lanes available for passengers vehicles should also be subject to similar studies for impacts on traffic flow on Wilshire Boulevard and for spillover in adjacent neighborhoods. For example, the reduction from three to two lanes from San Vicente to Santa Monica during peak rush hours, when parking is presently prohibited in Beverly Hills, is very likely to severely affect traffic flow cause spillover to Charleville and Gregory Way.*

CE (1)-12 *"Similarly, the reduction from four lanes presently, to three planned, at Westwood Boulevard and from three to two from Veteran to the 405 Freeway is likely to seriously affect the rush hour traffic to and from UCLA for this section of highway which has already earned it the title of most heavily traveled in the country. The effect on Westwood Village and the surrounding residential area must be considered. As a member of the Westwood Homeowner's Association Board, I will urge my group to be vigilant on this issue*

CE (1)-13 *"It is my belief that no lane reductions should be made on any street where rapid transit is introduced. You and our government elected officials must prove to the electorate that no deleterious effects are being instituted where the assured benefits do not out weigh the obvious harm. I call to your attention the public outrage which ensued when the first Freeway Diamond Lanes were instituted without compensatory widening of the freeways and the hasty reversal which occurred in the face of this public outrage.*

CS (1)-2 *To explain: The studies state that automobile and other vehicles that are displaced by the reduction of east/west traffic lanes "will find other routes".*

1. *The area east of the City of Beverly Hills has many 'other routes' available for use. This area was appropriately studied for the proposed BRT route.*
2. *However, at a line running along the western edge of the City of Beverly Hills several large obstructions prohibit the flow of traffic. These formidable obstructions (i.e. The Los Angeles Country Club, Century City, Rancho Park Golf Course and the Beverly Hills High School) have been in place for many years. Immediately north and to the south of those obstructions street design prohibits an easy /west flow of traffic.*

With this in mind I ask you: Where is this east/west traffic to go?
Currently, Sunset Blvd has badly congested traffic starting at approximately 4 P.M. and continuing until 7 P.M. or later. With the Morning rush hour just as bad. Santa Monica Blvd., Olympic Blvd. and Pico Blvd. are currently congested but

drivable [sic]. Construction will begin very soon on the SMBTP creating traffic chaos for a period of years. Following completion the bridged SMB access to Beverly Hills will slow traffic to a crawl. This leaves the Santa Monica Freeway available for long distance commutes, but shorter commutes toward the Hollywood area will find terrible congestion on the only routes available. Meanwhile, as a former resident of the Miracle Mile area I know the alternative east/west routes available. To name the best they are starting with Sunset Blvd., Franklin Ave., Melrose Ave., Beverly Blvd., Santa Monica Blvd., 3rd Street, Wilshire Blvd., 8th Street Olympic Blvd., Pico Blvd., Washington Blvd., Adams Blvd., etc.

DAD (1)-3 The installation of a BRT system along Wilshire Boulevard is a dangerous and destructive proposal. The potential decrease in lanes for service vehicles and automobiles to accommodate the exclusive bus lanes, will only add to the existing dangerous turn conditions, frequency of collisions, traffic noise, pollution, barely moving bumper-to-bumper and the number of frustrated drivers.. It is unrealistic to believe that the Wilshire BRT will be a solution to traffic congestion on this street as the Westside population grows.

*DIJ (1)-1 I am **opposed** to removing one lane of traffic in each direction along the entire length of Wilshire Blvd.*

EE (1)-2 Taking over two lanes of traffic and removing left-turn lanes will create need less congestion and negatively impact traffic flow on neighborhood streets. Moreover, the ambiances & businesses of an area that is only now being restored would be destroyed.

FV (1)-7 It will exacerbate traffic problems—make it more dangerous to drive with traffic compressed into fewer lanes. Also, it will greatly increase traffic use in side streets which are now greatly affected by the traffic load on Wilshire.

FV (1)-10 Because my schedule and destinations are to varied and too far to take advantage public bus service, I must drive , but avoid using Wilshire Blvd. and parts of Santa Monica Blvd. whenever possible because of their heavy traffic load. Others do the same. Taking away lanes will make that much worse. The same situation exists to an even greater extent in the corridor from Westwood Blvd. to the 405 Freeway.

GIR (1)-2 Removing parking also is undesirable as it becomes a general corridor, funneling traffic through, which is not conductive to business. People looking for parking over load residential areas.

HL (1)-3 The potential decrease in lanes for service vehicles, emergency vehicles and automobiles, to accommodate the exclusive bus lanes, will only add to the existing dangerous turn conditions, frequency of collisions, traffic noise, , pollution, barely moving bumper-to-bumper and the number of frustrated drivers.. It is unrealistic to believe that the Wilshire BRT will be a solution to traffic congestion on this street as the Westside population grows.

JOH (1)-3 1. I am particularly concerned about the negative impact on traffic flow and congestion which will be created along the entire route by eliminating existing traffic lanes. Many intersections are already severely congested. This proposal will only, in my opinion, serve to increase congestion.

JOL (1)-4 Nor does it adequately analyze the impact on surrounding residential streets if a traffic lane were removed from Wilshire Blvd.

JOL (1)-16 On the other hand, it is admitted many times in the DEIR that traffic diversion from Wilshire Blvd. onto arterial and residential streets would be "considerable". As mention above, it is so considerable that they have not even attempted to quantify it. Rather, they leave it to the Department of transportation to deal with after the fact. However, I am in an areas where residential streets are already in need of mitigation. I live between Wilshire Blvd. and Santa Monica Blvd. at Century City. The new developments on Santa Monica Blvd. will expand greatly the east-west traffic being carried past my residential street. Century City is expanding and has a further proposed expansion for the shopping center. People already cut through from Wilshire Blvd. to Century City on our residential streets and this will increase further without mitigation. If you take a lane off Wilshire in addition to the above changes, and you mitigate

the traffic on residential streets, where will cars go? We need a quantitative study to see if these changes are so disruptive to the residential areas that they create environmental havoc and affect the quality of life for residents as well as the value their properties. The DEIR has provided no such study as stated above.

UNREAD (25)-3 By taking two lanes away from automobiles, you are impeding the transport by ambulances to the neighboring hospitals, and driving traffic into the residential streets near Wilshire.

Topical Response B: Alternatives that had previously been considered would have resulted in the loss of a through travel lane on Wilshire Boulevard for 24 hours a day. The proposed project will result in the loss of a through-travel lane during peak periods only along segments of Wilshire Boulevard subject to the approval and testing by local cities/jurisdictions. A minimum of two lanes in each direction will be maintained along Wilshire Boulevard the entire length of the proposed project, with additional lanes in the segments between Westwood and Federal/San Vicente. There will be no change in the number or type of travel lanes in Santa Monica. The Draft EIR quantified the impacts of the loss of a lane on Wilshire through intersection level of service analysis and through mid-block volume-capacity analysis on parallel east/west and intersecting north-south streets. Table 3.2-23 (page 3.2-82 of the Draft EIR) indicates those intersections that were forecast to be impacted by the curb-adjacent BRT operations. Figures 3.2-14 and 3.2-15 (pages 3-2-50 and 51 of the Draft EIR) illustrate where the loss of a through lane on Wilshire Boulevard causes an impact on adjacent arterials in the A.M. and P.M. peak periods respectively. These impacts would be expected to occur with the proposed project. They would only be expected to occur during peak periods as opposed to 24 hours per day, however. The same traffic mitigation measures required of Alternative 1B in the DERS/EIR would be required for the proposed project. These include implementation of the ATCS traffic signal improvement system at approximately 500 intersections in the Cities of Los Angeles and Beverly Hills, signal timing modifications at eight locations and physical improvements at Hauser/6th Street. These measures will reduce the impacts of the loss of a through travel lane on Wilshire Boulevard during peak periods to less-than-significant levels at all locations except the Wilshire/La Cienega and Wilshire /Westwood intersections. The proposed project will not include the elimination of any turning opportunities along Wilshire Boulevard that might have caused drivers to seek alternate routes on residential streets to complete turns to/from Wilshire Boulevard. This reduces the likelihood that the proposed project would impact residential side streets. In order to mitigate any potential impacts on residential streets during peak-hours due to the loss of the curb lane for through traffic, however, the proposed project will include a contribution towards neighborhood traffic mitigation that will provide for monitoring of traffic conditions on adjacent residential streets and provide funds to develop and implement neighborhood traffic management programs.

Because of the high levels of community concern regarding this component of the Wilshire BRT project, a demonstration program has been proposed to test an A.M. peak-period lane in one or more short segments of Wilshire Boulevard. If approved by the local city (or County of Los Angeles for the Veterans Administration segment), the demonstration would allow affected residents and businesses a real-time test to determine the exact nature of the impacts. At the point, the local jurisdiction could determine if the project provides a public benefit.

■ Topical Response C: Effects of Design Options (e.g., left-turn prohibitions)

LAUSD (1)-12 The Baseline plan, which removes left-turn collector pockets, would put school buses and their passengers at greater risk of rear-end collisions while waiting to turn left.

LAUSD (1)-13 The median Adjacent plan, which would require traffic to transition across the bus-way lane(s), could pose the danger of an accident between bus-way traffic school buses in transition across the lane.

CBH (1)-9 *The City shares the Los Angeles Department of Transportation's concerns that the "permissive left-turn pockets" under BRT Option 1a, which would use the center travel lanes while retaining left turn movements and the center median may not be technologically feasible.*

CBH (2)-6 *Turn movements will be significantly impacted, if not precluded, by dedicated bus lanes.*

CLA (1)-20 *Locations for new traffic signals are identified without any discussion as to whether they can be warranted under City standards and what impact they will have on traffic flow. Justification for each new signal should be listed.*

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

WHA (1)-3 *The reduction at Westwood Boulevard from four lanes at present to three, and from Veteran to the 405 freeway from three lanes to two is likely to affect seriously the traffic to and from UCLA for intersections which have already earned the title of most heavily traveled.*

WT (1)-2 *The "Wilshire Corridor" is a residential street on which the present buses have only a minor impact on traffic, whereas the BRT plan will cause serious congestion. Because of the age and infirmities of many of the residents the time necessary for them to get to the center of Wilshire Blvd. will be at best a traffic stopping event and at worst a major cause of personal injuries.*

ANON (2)-2 *We believe that the busses [sic] should be doubled decked, instead of the two lanes of traffic for cars deleted in place two-way busses [sic]. Letting people out in the middle of the street will add to the carnage we now have on the corridor.*

CAF (1)-2 *1) The heavier traffic on Wilshire Blvd. and the removal of left turn pockets and the removal of parking spaces.*

EE (1)-2 *Taking over two lanes of traffic and removing left-turn lanes will create need less congestion and negatively impact traffic flow on neighborhood streets. Moreover, the ambiances & businesses of an area that is only now being restored would be destroyed.*

INP (1)-8 *Section 2.0, Att. B: no cross section for the Westwood section and the interchange of Wilshire and the San Diego freeway. How can a dedicated bus line be accommodated in that area? See also Page 3.2-57.*

JOP (1)-4 *Eliminating the center turn lanes can only cause more accident and more fatalities and both are already excessive on Wilshire.*

Topical Response C: These comments relate to the impacts of a particular element of a design alternative that is no longer under consideration. The proposed project will be implemented in the lane adjacent to the curb. Buses will share the curb lane with right-turning vehicles. In the areas between Sepulveda Boulevard and Federal/San Vicente and in the City of Santa Monica there will not be a dedicated lane and BRT vehicles will travel in mixed flow with other vehicles. No new left-turn prohibitions are proposed, nor any restrictions on driveway access, and comments on this issue are no longer applicable to the currently proposed project.

Topical Response D: Major Investment Study

CLA (3)-35 *2. Bus lanes on streets parallel to Wilshire Boulevard, with no bus lanes on Wilshire Boulevard.*

ANC (1)-2 *At the meeting held at the VA a few weeks ago, I suggested that the whole plan be scrapped. I had suggested that a train system be constructed on the freeways, named [sic] the 405, the 10, and why not the 101 from downtown out to the west valley. Such a system would cover a greater area and help a lot of people...I suggested a system similar to that which is on the 105. Even a mono-rail system would be good.*

BRAH (1)-6 *[The Green Line light rail system provides a possible solution to traffic congestion because it runs down the middle of the Century Freeway (#105). This idea could be used for both the Santa Monica (#10) and the San Diego Freeways (#405). Light rail systems could run in the median of both freeways.] This idea would provide the necessary transportation linkages and services to the communities in the Mid-City/Westside area without significant impacts.*

BRR (1)-3 *Also, NO SUBWAYS or other pie-in-the-sky claptrap that's being spouted by the perpetual activists at this meeting. Los Angeles has unique environmental concerns that cannot be easily addressed by what works well in flatter, less shaky parts of the country.*

DA (1)-1 *Our family is all for light rail on the Westside and suggest that you also have the foresight to take it to the airport.*

GEA (1)-6 *It seems that an alternative route must and should be considered.*

JEW (1)-6 *And as far as your plans for Wilshire Boulevard—just complete the subway as originally planned. Forget about the buses!*

JOH (1)-8 *Finally, since Santa Monica Boulevard is due for a face-lift, the MTA should consider Santa Monica Boulevard for the proposed busway instead of Wilshire Boulevard.*

MARB (1)-13 *One final comment is in regard to the cancelled Red Line extension. I would support a future Red Line extension to Wilshire/Federal and further to 4th and Colorado in Santa Monica. The alignment should be along Wilshire Boulevard, San Vicente to Cedars Sinai/Beverly Center, 3rd Street or Burton Way, and Santa Monica to Century City. This routing would provide service to a major activity center near Beverly and San Vicente and would bypass part of Beverly Hills along Wilshire. This routing would minimize local opposition in Beverly Hills and reduce station land acquisition costs along Wilshire through that city.*

MIM (1)-3 *Buses cannot move as many people as trains and would be more expensive in the longer term. More pollution, slower, noisier.*

MJ (1)-3 *As you know, other alternatives are available—(I'm sure not too welcome to anywhere) but not so destructive to the city we are all busy trying to build.*

NJ (1)-5 *I would also like to see the development of short shuttle-like bus routes from Santa Monica to Westwood to Century City and back. Both the Wilshire and the Exposition Corridors ignore Century City.*

RS (1)-1 *We would like a Project Consideration for BRT or LRT on Olympic Blvd.*

1) Direct route from Santa Monica to downtown L.A.
2) Wide street, and straight route.
3) Ridership high and travel time shorter
4) Will NOT disrupt families and business.
5) Travels through a denser more commercial area.
6) Requires less construction, and should be cost effective.

STH (2)-5 *I instead suggest that you build a public transportation system in the middle lane of the Santa Monica (10) freeway or build Bus Rapid Transit, Alternative 2.*

THR (1)-2 *My main concern is that this report is incomplete and requires substantial additional work to analyze transportation alternatives that have not been studied.*

THR (1)-16 *There are other well-known, and low cost, options such as "queue jumper" and bypass lanes that could further speed up both Line 720 and other Rapid Bus Lines through the Study Corridor. None of these options appear to have been pursued as part of the TSM alternative, even though they are exactly the type of low-cost improvements that could be used as examples of what should be so included.*

THR (1)-35 I am very disappointed that one of the alternatives considered was not a pair of limited access lanes on the Santa Monica (I-10) Freeway, combining one, two, or all three of the following: busway, high-occupancy vehicle (HOV), and high-occupancy/toll (HOT).

THR (1)-37 While an I-10 high occupancy lane would undoubted be expensive and would present several technical difficulties, the very large potential benefits, coupled with likely low capital cost, make it difficult to understand why this was never an option in this corridor study.

T (1)-133 I mean, I've worked, I'm a poly-sci major, I've been downtown, I see who talks to these people. It's not us. I mean, no one has said, we don't know light rail. Yet we still don't have it. We don't have any transit alternatives.

T (1)-173 I also wanted to just echo what someone said earlier. Subway may be a nice notion, but the fact that it has to go down Wilshire Boulevard, I'm pretty sure that still runs through Beverly Hills, and that will never fly. But in the year 2001 I think we could possible consider monorails because they accomplish the same thing as the subway.

T (1)-208 Also, maybe west of—or through Beverly Hills you might consider going down Santa Monica Boulevard in order to get through Beverly Hills, depending on what can be done there.

T (3)-330 At any rate I do think that there [sic] a lot of alternatives, and I'd like us to consider them. And I don't want us to become wedded to something that was created in the 1940s, and this is what needs to happen.

T (3)-423 But taking the Santa Monica corridor would serve a number of excellent station sites along the length and continuing west of the 405 down on into Santa Monica and going all the way to the pier. Santa Monica Boulevard should be considered as an alternative in the draft EIR to the Wilshire Boulevard corridor.

Topical Response D: Providing high-capacity transit service improvements has been long recognized as a principal need in the Mid-City/Westside Area. Since the 1970's, the Los Angeles County Metropolitan Transportation Authority (MTA) and its predecessors (SCRTD, LACTC) have conducted numerous transportation planning and environmental impact studies that established the need and feasible locations for improved east-west oriented transit service in various parts of the Study Area.

The Regional Transit Alternatives Analysis (RTAA Study) (July-November 1998) accomplished several important objectives for the MTA. The study identified the amount of funding available for new projects between FY1999 and FY2004; it suggested possible funding allocations; it identified immediate bus transit improvements in Los Angeles County; and it established a framework for further fixed guideway project development in the Eastside, Mid-City, and San Fernando Valley Study Areas. The study included a preliminary evaluation of fixed guideway alternatives in the Eastside, Mid-City, and San Fernando Valley Study Areas. The study did not make recommendations with regard to preferred fixed guideway transit modes or configurations, however, it recommended that a Major Investment Study level of analysis be conducted to provide more information regarding these choices. Results of the RTAA Study were presented to the MTA Board on November 9, 1998. At that meeting, the Board approved the concept of a recommended rapid bus plan, and subsequently the MTA developed a demonstration project for two rapid bus lines serving the Eastside, Mid-City, and San Fernando Valley. The Board also reaffirmed its commitment to fund fixed guideway transit improvements beyond rapid bus in the suspended rail corridors. A priority funding commitment of $220 million through FY2004 was made to the Eastside and Mid-City areas from remaining uncommitted funds.

Other studies conducted within the Mid-City/Westside Study Area include the Los Angeles Metro Orange Line Extension Transitional Analysis Study, July 1990; Exposition Right-of-Way Preliminary Planning Study, May 1992; Exposition Right-of-Way Final Draft Phase I Summary Report, December 1994; Exposition Park Branch Line Rail Transit Corridor Route EIR, April 1992; Mid-City Extension Reassessment Study, July 1994; and the Westside Bus Improvement Study, March 1998. Of particular relevance to the Wilshire BRT project, the

Westside Bus Improvement Study examined bus improvements in the area bounded by Hoover/Hyperion, the Pacific Ocean/Malibu, Mulholland Drive, and I-10 Freeway/Culver City southern boundary/Jefferson Boulevard. The study found that the current bus service resulted in slow arterial bus operations, overcrowding on certain lines/times, bus bunching, and continuity and coordination problems. Recommendations included introducing new and faster "Metro Rapid Bus" service and high capacity buses; adjusting network and services for Metro Red Line openings; improving network connections and service continuity; restructuring duplicated or poorly performing bus route segments; enhancing bus passenger facilities; and developing a "seamless" fare structure.

The MIS process that preceded this environmental study examined a broad range of alternatives to address the need for transportation improvements in the Study Area. This process screened out alternatives that were determined not to be feasible or that contained other significant flaws that precluded further analysis. The MIS process recommended a series of alternatives for further analysis, as follows:

- *No-Build Alternative*—The No Build alternative is comprised of the existing transit and bus systems currently in use or expected to be in place in 2020. This includes the existing alignments and operating schedules of the Red, Blue and Green Lines, as well as the approved Pasadena Blue Line. It assumes that regular bus service will be expanded as required to meet projected 2020 ridership demands.
- *Transportation System Management (TSM) Alternative*—This alternative is based on the No Build characteristics with the addition of three Metro Rapid Bus lines: Wilshire/Whittier, Santa Monica Boulevard and Crenshaw Boulevard.
- *Alternative 1—Wilshire Bus Rapid Transit*—This alternative involves the operation of an all-day BRT service along Wilshire Boulevard. This service is intended to operate similar to a light rail transit (LRT) system with stops limited to approximately one every mile or at major cross-streets, and the use of exclusive bus lanes with signal priority (i.e. extended green times).
- *Alternative 2—Exposition Bus Rapid Transit (BRT)*—This alternative would connect Metro Center (7th and Flower Streets) in downtown Los Angeles to Ocean Avenue in Santa Monica using a 15.6-mile BRT system along the Exposition ROW, currently owned by MTA.
- *Alternative 3—Exposition Light Rail Transit (LRT)*—In this alternative, an LRT operation would start from Metro Center (7th and Flower Streets), utilizing the existing Long Beach Blue Line tracks to Washington Boulevard. At this location, it would branch off the Blue Line and proceed south on Flower Street to the Exposition ROW, which it would follow to downtown Santa Monica via the Exposition ROW (Figure 2.18). Two similar alignments are being considered for this line, Alternative 3a (Baseline) and Alternative 3b (Minimum Grade Separations).
- *Alternative 4—Wilshire Subway Heavy Rail Transit (HRT) (via Pico/San Vicente)*—The entire alignment would be approximately 10.1 miles long and would be in tunnel except at stations, where cut and cover construction would be used. While this alignment was in the environmental clearance stage when work was stopped, it never officially reached LPA status.
- *Alternative 5—Wilshire Subway Heavy Rail Transit (HRT)*—This alternative proposes the extension of the Red Line in subway along Wilshire Boulevard to San Vicente Boulevard, using construction methods that mitigate the effect of working in the methane and H_2S gas zones. While this alternative was at one time considered not viable due to the dangerous presence of gases, subsequent development in tunneling techniques that can safety mitigate these dangers has allowed it to be "revisited" as a viable option.
- *Alternative 6—Wilshire Aerial Heavy Rail Transit (HRT)*—An alternative to tunneling entirely through the methane and H_2S gas zones under Wilshire Boulevard is to construct an aerial guideway over part of the route. This would involve transitioning the alignment from subway just west of Crenshaw Boulevard to an open cut, onto retained fill section and then to aerial structure.

Alternatives 4, 5, and 6 were rejected as infeasible due to funding restrictions and/or environmental considerations.

The suggestions and comments regarding alternative projects to serve Westside transit needs are noted for the record. It should also be noted that the proposed Wilshire BRT project does not, in general, preclude future implementation of many of the suggested alternative projects.

9.6.2 Individual Responses

The following section contains responses to substantive individual comments. These comments/responses have been categorized first by commenting agency (i.e., federal, State, regional, City, organizations, individuals, petitions, and public testimony), then within those categories alphabetically by comment letter code. The original comment letters were bracketed to denote discrete comments, and each comment was assigned nomenclature that corresponds to the commenter and the number of the comment. As noted above, comments that raise significant environmental issues are provided with responses. Standard responses are provided for comments that: (1) do not raise any environmental issues; (2) provide general information; (3) are outside the scope of the proposed project and the EIR; (4) raise concerns that are outside the scope of CEQA/NEPA review, but may address the proposed project; (5) pertain solely to the Exposition LRT, or raise issues concerning elements of the project that are no longer being considered. All comments will be made available to the decision-makers as part of the administrative record used to consider approval of the proposed project.

Comment Letter 1: Federal Emergency Management Agency, May 2001

FEMA (1)-2: I am writing in response to the request for review that your office has submitted to the Federal Emergency Management Agency (FEMA). The request pertains to Release of Draft Environmental Impact Statement/Report—Mid-City/Westside Transit Corridor Study. Due to the volume of requests that we receive, we have not performed a detailed review of the project. However, we offer the following comments.

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

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

Response: The Federal Emergency Management Agency (FEMA) is concerned that the Wilshire BRT project is located within Special Flood Hazard Areas (SFHA), which may be subject to inundation during a flood having a one-percent chance of occurrence in a given year (also known as the base flood or 100-year flood).

The alternative under consideration along Wilshire Boulevard is the curb-lane, peak-hour only BRT system. As indicated in Section 3.11.2 and 3.11.3, a portion of the Wilshire BRT would be subject to flooding during 100-year storm events. However, portions of Wilshire Boulevard are, and will continue to be, subject to limited flooding of short duration. However, the City's storm drain system is designed to accommodate the anticipated design year flood events. Some of the existing storm drains on Wilshire Boulevard must be reconstructed as part of the resurfacing process. This reconstruction will be subject to the review and approval of the Engineering Bureau of each City through which the Wilshire BRT would traverse to ensure a properly operating system. Additionally,

since the transit stops are located slightly above the street system, where a majority, if not all, of the drainage occurs, implementation of this alternative would not expose people and/or property to increased water-related hazards.

FEMA (1)-3 Our first area of concern relates to structures that may be part of the project. For new or substantially improved structures (including manufactured housing) located within SFHAs, the NFIP regulations require a community to:

- *Issue permits for construction.*
- *Ensure that the lowest floor (including basement) is elevated to or above the base flood elevation shown on the community's FIRM.*
- *Ensure that any enclosed areas below the base flood elevation are used solely for access, temporary storage, or parking; are constructed of flood-resistant materials; and are properly vented to allow equalization of hydrostatic pressure in the event of a flood.*
- *Maintain records of permits and lowest flood elevations.*

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

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

Response: Stations located along the Wilshire BRT alignment would consist of a flagpole sign, a translucent canopy, nighttime illumination, an electronic message sign, and route maps (see Figure 2-2 in the DEIS/DEIR). No structures, as defined by the FEMA, would be constructed along the Wilshire BRT alignment. The two parking facilities proposed for the project would not create new or improve any existing structures that are currently located on the two sites. Thus, the Wilshire BRT alignment and the two parking facilities would not be required to follow the National Flood Insurance Program (NFIP) regulations for structures. Although no structures are proposed for the Wilshire BRT alignment and the two parking facilities, a new building would be constructed at the proposed bus maintenance facility site. Structures that would be constructed at the proposed bus maintenance facility would comply with the FEMA's floodplain management criteria. If the community's floodplain management ordinance contains more restrictive criteria, then the proposed project would comply with the requirements of the community's ordinance.

FEMA (1)-4 Our second area of concern relates to the potential effects of the project on flood hazards. If the project will physically affect flood hazards shown on the FIRM, it is subject to the following:

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

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

The FIRM should accurately reflect changes to flood hazard information, such as shifts in floodplain boundaries or changes in base flood elevations, once construction is completed. If construction results in any change to the flood hazard data shown on the FIRM, the community must request a revision to the FIRM within 6 months of completion of the

work. FEMA has developed an application/certification package that the community must use to request a revision. This package is available electronically on FEMA's website at www.fema.gov/mit/tsd/FRM_form.htm.

Response: The Federal Emergency Management Agency (FEMA) is concerned with the potential effects of the project on flood hazards. Refer to response to comment FEMA(1) #2 and #3. The Wilshire BRT project will not physically affect flood hazards shown on the Flood Insurance Rate Map (FIRM). No shift in floodplain boundaries or changes in base flood elevations are expected due to implementation of this project.

Comment Letter 2: United States Department of the Interior, August 2001

USDOI (1)-2 We concur that there are no prudent and feasible alternatives to the proposed project, if project objectives are to be met. However, as described below, additional measures to minimize harm to potential archeological resources should be included in the Final Memorandum of Agreement with the State Historic Preservation Officer.

Response: Implementation of the Wilshire BRT, as currently proposed, does not include any excavation activities. Because the project only envisions re-paving and shallow excavation (less than two feet) along portions of Wilshire Boulevard along the curb lane, rather than the removal and reconstruction of landscaped medians or the installation of aerial structures, impacts to subsurface archaeological resources are not anticipated and no additional mitigation measures are required.

USDOI (1)-3 There appear to be 3 to 12 known archeological sites within the area of potential effect of the two project alternatives (Wiltshire [sic] and Exposition Alignments). The potential exists for additional known and unknown sites to be discovered during project construction. As a result of urban development the locations of previously recorded sites have not been precisely identified on the ground.

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

> *"Areas subject to physical disturbance by the undertaking are subjected to intensive archeological study in accordance with a study plan developed in consultation with the State Historic Preservation Officer (SHPO), and submitted in draft to the SHPO for at least 30 days of review and comment."*
>
> *"If the study indicates the existence of archeological resources, the Los Angeles County Metropolitan Transportation Authority (MTA) will review the potential significance of such resources with the SHPO to determine whether they are significant. The MTA may elect to design the project to preserve resources in place or to conduct archaeological data recovery to recover significant data from such resources."*

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

Response: Refer to Response to Comment USD 01(1)-2 for a discussion of potential impacts to archaeological resources. In addition, although not anticipated, if any significant excavation activities are necessary, the MTA (or its designated contractor) would retain a qualified vertebrate paleontologist approved by the Los Angeles County Museum of Natural History—Vertebrate Paleontology Section (LACMVP) to prepare and supervise the mitigation program prior to any construction activities. Implementation of the recommended mitigation measure would reduce any potential impacts to paleontological resources to less than significant.

USDOI (1)-5 The Draft EIS correctly identifies the Hollywood and Santa Monica fault zones and the Newport-Inglewood fault zone as being accorded Alquist-Priolo status as active faults. There is no mention however, of the shaking hazard posed by more distant faults such as the San Andreas Fault, which constitutes the majority share of the North American-Pacific Plate Boundary strain (and relatively frequent large earthquakes). Shaking from more distant faults can still cause damaging levels of ground motion and needs to be factored into any probabilistic seismic hazard analysis for this transit corridor (Page 3.10-1—3.10-3, Section 3.10.2 Affected Environment; Active and Potentially Active Faults and Alquist-Priolo Fault Hazard Zones).

Response: The United States Department of the Interior (USDOI) comments that the Draft EIR does not mention the shaking hazard posed by distant faults, such as the San Andreas Fault. Under the Wilshire BRT, Wilshire Boulevard would be reconstructed to accommodate transit buses traveling along the curb. All construction would be at-grade and no structures would be constructed for the proposed project. It is not anticipated that shaking from distant faults, such as the San Andreas Fault, would result in new, different, or increased seismic hazards.

USDOI (1)-6 The State of California, Division of Mines and Geology, is charged with the task of zoning the State of California with respect to liquefaction hazards, and they have produced maps that are drawn at a scale of 1:24000 (2000 ft on the ground = 1 inch on the map). The Seismic Hazards Mapping Act of 1990, authorized these liquefaction hazard assessment maps; consequently, these maps would supersede the old U.S. Soil Conservation Service soil maps cited in the DEIS and even the U.S. Geological Survey (USGS) liquefaction maps published in 1985. The use of the new liquefaction hazard maps will help to define the areas of concern. However, the site specific engineering evaluation for the design of the foundation of elevated light rail structures should be included in the geotechnical survey and distributed for comment before the final Draft EIS is released (Page 3.10-3, Liquefaction Potential and Other Soil Considerations).

Response: The United States Department of the Interior (USDOI) comments that the liquefaction hazard maps that are produced by the State of California, Division of Mines and Geology, should be used to identify potential liquefaction areas.

The Seismic Hazard Zones map published by the California Department of Conservation, Division of Mines and Geology (now officially referred to as the California Geological Survey) for the Beverly Hills, Hollywood, and Los Angeles Quadrangles indicates the same potential liquefaction areas as indicated by Figure 3.6-3, which relies upon data derived from the City of Los Angeles. Both sets of data indicate that three general segments of the Wilshire BRT are located within liquefiable areas. Along the Wilshire BRT alignment, these areas are located between La Jolla Avenue and La Peer Drive, Westwood Boulevard and Interstate 405, and Bundy Drive and Centinela Avenue. Additionally, the proposed Wilshire BRT project does not consist of elevated light rail structures, so a geotechnical survey would not be necessary for the proposed project.

Comment Letter 5: United States Environmental Protection Agency, June 2001

USEPA (1)-11 Finally, EPA is concerned that the analysis of the project effects on local business did not analyze disproportionate impacts to disadvantaged business-owners and only looked at parking impacts, and not construction impacts. The EIS should analyze disproportionate impacts to disadvantaged business-owners.

Response: Construction effects were fully analyzed and disclosed in Section 3.18 of the Draft EIR. In addition, as noted on Page 55, Executive Summary of the Draft EIR, residual construction impacts would be less than significant for all environmental issue areas, with the exception of traffic, after the recommended mitigation measures are implemented. The Final EIR includes a Construction Mitigation Plan that states that the MTA shall develop a plan to maintain accessibility, as well as providing parking and signage, to the affected businesses. This plan shall be combined with a public information and marketing campaign which would inform the public that

business is still available and how the businesses can be accessed. As noted on Page 3.14-14 of the Draft EIR, the loss of parking along Wilshire Boulevard would be the catalyst for any socioeconomic impact, and the effects on local businesses for the curb design option are discussed on Pages 3.4-16 to 3.14-17 of the Draft EIR. Because parking would not be eliminated under the currently proposed project, secondary socioeconomic effects are anticipated to be less than significant. In addition, traffic delays associated with the proposed project are anticipated to be minimal. A traffic management plan to identify construction staging, detour routes, and mitigation measures to the adjacent neighborhood would be developed and approved by the community and local jurisdictions during the final engineering phase and then reconfirmed by the contractor before work proceeds. Appropriate construction mitigation measures would be implemented, which may include appropriate detours, staged work, time limits on closures, and notification to all businesses and residents of the hours of work. The impacts from construction would be temporary and mitigable and are not anticipated to disproportionately impact disadvantaged business owners.

USEPA (1)-12A

- *Perform an Environmental Justice analysis on the proposed sites for the BRT and LRT storage and maintenance facilities.*
- *Identify additional sites for the LRT storage and maintenance facility.*
- *Determine whether disadvantaged business-owners will be disproportionately impacted by construction and operation of the proposed project. If disproportionate impacts are identified, provide mitigation, such as business assistance during the construction period.*

Response: An Environmental Justice analysis for the Wilshire BRT was provided in Section 4.7 of the Draft EIR. Ethnic breakdowns for the areas within ½ mile of the Wilshire Corridor are provided in Tables 4-1 and 4-2, while low income and minority population data are provided in Table 4-6. In addition, the community associations contacted in the course of this project are disclosed in Section 6.0 of the Draft EIR. As noted on page 5-18 of the Draft EIR, the Wilshire BRT route stations contains less than 33% minority and low-income households, and thus does not disproportionately affect low income and minority households. On the contrary, the provision of faster transit service along the Wilshire Corridor should positively affect the minority and low income neighborhoods' access to jobs, shopping, education, and social services. Pages 5-16 through 5-18 outline the twelve (12) reasons that the corridor warrants an increased transit investment. Pages 4-5 through 4-10 of the Draft EIR present detailed ethnicity and income data by segment for the Wilshire Corridor (as well as the Exposition Corridor which is no longer part of the project). As detailed on pages 3.15-15 and 3.15-16 of the Draft EIR, the two sites along Washington Boulevard are located in industrial areas and there are no community facilities within ½ mile of the sites and no impacts are expected. Refer to Response to Comment USEPA (1)-11 for a discussion of potential impacts to disadvantaged business owners.

USEPA (1)-20 *<u>Text Clarification</u>—The DEIS uses 1990 Census data. Since some 2000 Census data has been released, it would be appropriate to include a statement regarding why 1990 Census data is used. Recommendation:*

- *If available, use 2000 Census data.*

Response: At the time of preparation and circulation of the Draft EIR, Census 2000 data for California had not yet become available. Section 15125 of the CEQA Guidelines provides that an EIR must include a description of the physical environmental conditions in the vicinity of the project, as they exist at the time the Notice of Preparation (NOP) is published. As required by CEQA, the environmental impact analyses in the Draft EIR were predicated on the date the NOP was published, which in this instance was May 2000. Therefore, the lead agency is not required to include 2000 Census data in the environmental documentation for the proposed project.

Comment Letter 7: California Department of Transportation, May 2001

CADOT (1)-3 Any work to be performed within Caltrans Right-of-Way will need a Caltrans Encroachment permit.

Response: The Wilshire BRT project will pass under the Interstate 405 in Westwood. While there are no street improvements planned, any traffic signal modification work will be coordinated with Caltrans and required permits and approvals will be obtained.

Comment Letter 12: County of Los Angeles Fire Department, May 2001

CLAFD (1)-3 Size, complexity, and projected use of the proposed project may necessitate multiple ingress/egress access for emergency response issues. The development of this project must comply with all applicable code and ordinance requirements for construction, access, water main, fire flows and hydrants.

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

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

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

Response: The County of Los Angeles Fire Department comments that the development of the proposed project must comply with all applicable code and ordinance requirements for construction, access, water main, fire flows, and hydrants. Additionally, the development of the proposed project must comply with the California Building Code Section 414, National Fire Protection Association (NFPA) 130, and the County of Los Angeles Fire Code. All streets and highways shall be designed and constructed to comply with the Los Angeles County Code, Title 21. Specific fire and life safety requirements for the construction phase will be addressed at the building fire plan check. Every building constructed shall be accessible to Fire Department apparatus by way of access roadways.

The alternative under consideration is a peak-hour, curb-lane only BRT system along Wilshire Boulevard. Construction for the Wilshire BRT alignment consists of restriping and repaving the outside curb lane of Wilshire Boulevard to create a flat driving surface for buses. Stations located along the Wilshire BRT alignment would consist of a flagpole sign, a translucent canopy, nighttime illumination, an electronic message sign, and route maps (see Figure 2-2 in the DEIS/DEIR). No buildings would be constructed along the Wilshire BRT alignment. The proposed project would also consist of developing a bus maintenance facility at the existing bus maintenance facility (Division 10, located at the corner of Cesar Chavez Avenue and Mission Boulevard). Development of the proposed bus maintenance facility would involve the construction of one building. The proposed project would comply with all applicable code and ordinance requirements for construction, access, water main, fire flows and hydrants. The proposed project would also comply with the California Building Code Section 414, National Fire Protection Association (NFPA) 130, and the County of Los Angeles Fire Code. All streets and highways shall be designed and constructed to comply with the Los Angeles County Code, Title 21. The proposed project would comply with all the fire and safety requirements that would be addressed during the building fire plan check. Additionally, the Final EIR would include a mitigation measure which states, "The building that would be constructed at the proposed bus maintenance facility shall be accessible to Fire Department apparatus by way of access roadways, with an all weather surface of no less than the prescribed width, unobstructed, clear-to-sky. The

roadway would be extended to within 150 feet of all portions of the exterior walls when measured by an unobstructed route around the exterior of the building."

CLAFD (1)-4 Development may require fire flows up to 5,000 gallons per minute at 20 pounds per square inch residual pressure for up to a five-hour duration. Final fire flows will be based on the size of the buildings, their relationship to other structures, property lines, and types of construction used. Fire hydrant spacing shall be 300 feet and shall meet the following requirements:

1. *No portion of lot frontage shall be more than 200 feet via vehicular access from a public fire hydrant.*
2. *No portion of a building shall exceed 400 feet via vehicular access from a properly spaced public fire hydrant.*
3. *Additional hydrants will be required if hydrant spacing exceeds specified distances.*
4. *A Fire Department approved turning area shall be provided at the end of a cul-de-sac.*

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

Response: Amenities for the bus stations include canopy lighting, a transit information kiosk, a perforated metal screen, a hedge, and protective bollard (see Section 2-20 and 2-21 of the FEIR). The proposed bus maintenance facility would construct one building and expand one existing building on the bus maintenance facility site. All stations and maintenance yard would comply with the requirements of the Los Angeles County Fire Department.

CLAFD (1)-6 All proposals for traffic calming measures (speed humps/bumps, traffic circles, roundabouts, etc.) shall be submitted to the Fire Department for review, prior to implementation.

Response: As noted in FEIR Mitigation Measure 3.2-5, if the peak-period lane were implemented, LADOT and City staffs of Beverly Hills and Santa Monica would be changed with the responsibility to monitor neighborhood traffic and develop traffic mitigation programs for each impacted neighborhood. Each city has an established procedure for the development of neighborhood traffic management programs, which includes consultation with the appropriate fire department to make sure that traffic-calming measures do not significantly affect emergency response time. The County Fire Department will be consulted as appropriate, if traffic-calming measures are considered in the County Fire Department service areas.

Comment Letter 13: County of Los Angeles Department of Public Works, June 2001

LACPW (1)-3 The proposed project will not have significant environmental effects from a geology and soils standpoint. The project is located within a mapped potentially liquefiable area, per the State of California Seismic Hazard Zone Map, Beverly Hills and Hollywood Quadrangles. However, liquefaction analysis is not warranted at this time. Detailed liquefaction analyses, conforming to the requirements of the State of California Division of Mines and Geology, Special Publication 117, must be conducted at the Tentative Map and/or Grading/Building Plans stages.

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

Response: According to the State of California Seismic Hazard Zones Map, Beverly Hills and Hollywood Quadrangles (published by the California Department of Conservation, Division of Mines and Geology), three segments of the Wilshire BRT alignment are located within liquefiable areas. These areas are located between La Jolla Avenue and La Peer Drive, Westwood Boulevard and Interstate 405, and Bundy Drive and Centinela Avenue. The proposed Wilshire BRT alignment does not consist of elevated light rail structures. Further, the two

community parking facilities proposed for the Wilshire BRT would be located on Wilshire Boulevard at Crenshaw Boulevard and La Brea Avenue. No structures are proposed at these two parking facilities. The Wilshire BRT alignment would be at-grade. Thus, a geotechnical survey would not be necessary. The proposed bus maintenance facility would be located at the corner of Mission Road and Cesar Chavez Avenue. The proposed bus maintenance facility would not be located within a mapped potentially liquefiable area, per the State of California Seismic Hazard Zone Map, Los Angeles Quadrangle. Thus, a geotechnical survey would not be necessary at the proposed bus maintenance facility.

Comment Letter 15: Los Angeles Unified School District, June 2001

LAUSD (1)-2 This project has the potential to greatly impact school transportation for nearly 300 school bus routes and the safety of nearly 3,000 student pedestrians at/near school bus stops.

Response: Refer to all Responses in the three comment letters submitted by the LAUSD with respect to impacts on school transportation and student safety.

LAUSD (1)-14

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

Response: The commenter expresses a preference for the Curb Adjacent Design Option based on perceived safety considerations. The commenter also raises a question about the relocation of school bus stops. The Curb Adjacent Design Option is not intended to affect local bus stops, which would remain in the curb lane. School buses would be able to continue stopping at local bus stops as well, wherever they use such stops. There are no designated school bus stops along Wilshire Boulevard which would be removed by the proposed project.

LAUSD (1)-18

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

Response: The construction impacts addressed in these comments are discussed in Section 3.18 of the Draft EIR. The changed traffic patterns and lanes are now limited to peak periods only for the proposed project. Please also refer to Topical Responses B and C for a discussion of the effects of the design options. Also refer to Response to Comment LAUSD (1)-14 with regard to school bus stops. The MTA is sensitive to the LAUSD's concerns regarding the operating costs of significant traffic delays, which is one of the main primary reasons that the BRT project is being implemented.

LAUSD (1)-19

- *Additional dangers to student pedestrians may occur from staging of trucks along streets along portions of the project, increased truck traffic, maneuvering of heavy equipment, and other construction activities.*
- *Access to construction sites may expose student pedestrians to unexpected dangers.*

- *Trucks, workers, and equipment may draw the attention of students who may not respond appropriately to the excitement of construction activity.*
- *During and after construction, changed traffic patterns, lane adjustment, traffic light patterns and altered bus stops may impact student pedestrian safety.*

Response: Construction of the project is generally contained within a 4-mile segment of Wilshire Boulevard between Western and San Vicente. During the construction phase, students would not have access to construction sites since barriers would be installed on the construction sites such that the public is separated from work areas. The Construction Mitigation Plan states that construction specifications will stipulate that haul truck staging areas and routes shall avoid schools and school walk routes. During construction, pedestrian pathways would be cordoned off and protected from traffic and potential dangers that are typically associated with construction activities. Additionally, the Final EIR mitigation program states that any construction that occurs within 500 feet of a school shall require the MTA contractor to coordinate with the LAUSD to ensure that any potential impacts associated with student/vehicular access to sidewalks/roads would be minimized. This measure includes coordinating with the LAUSD in determining alternative walk routes during construction should construction activities affect designated school crosswalks. The MTA contractor shall also be required to provide crossing guards during active construction to ensure the safety of school children.

During the operations phase of the proposed project, Section 3.14 of the Draft EIR states that all pedestrian crossings along the Wilshire BRT would be signalized, and appropriate signage would be installed. The signs would clearly indicate correct methods to cross.

LAUSD (1)-20

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

Response: Refer to Response to Comment LAUSD (1)-19 for a discussion of additional school safety measures during project-related construction activities. In addition, construction vehicles will stop if they encounter a school bus with red flashing lights.

LAUSD (1)-21

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

Response: The Final EIR will add a mitigation measure which shall require that LAUSD be informed of the detailed construction schedule for the proposed project once it is finalized. The bid specifications for the construction of Wilshire improvements shall require the contractor to develop and implement an on-going traffic and construction information program that will inform all affected businesses, schools, and community facilities of closures and alternative access.

LAUSD (1)-22

- *Contractors to avoid staging trucks and equipment along streets in the proposed areas to facilitate the movement of buses during peak traffic hours.*
- *Contractors to provide flag-men to assist traffic when moving trucks and/or heavy equipment on/off the proposed sites or when temporarily closing traffic lanes.*

- *When possible, avoid heaviest construction traffic between the hours of 6:30 a.m. to 8:00 a.m. and between 2:30 p.m. and 4:00 p.m. to minimize traffic delays to the arrivals and departures of buses and encounters with student pedestrians.*
- *Time spacing of portions of the projects to minimize traffic flow impacts.*

Response: The Construction Mitigation Plan includes a mitigation measure that states that construction specifications will stipulate that the Contractors Draft Traffic Management and Site Access Plan shall avoid schools and school walk routes. As stated in Section 3.18, street specific Worksite Traffic Control Plans would be developed in cooperation with the City of Los Angeles Department of Transportation, City of Beverly Hills, City of Santa Monica, and Los Angeles County to accommodate required pedestrian and traffic movements. Additionally, traffic lanes would be maintained in both directions, particularly during peak traffic hours. The Construction Mitigation Plan includes a mitigation measure that states that flag-men would assist traffic when moving trucks and/or heavy equipment on/off the construction area. In addition, the Construction Mitigation Plan includes a mitigation measure stating that the contractor will be required to notify all businesses, schools, cities, and transit operators of closures in effect on a daily basis during construction; further, the contractor shall be required to rotate driveway/road closures so that no business blocks are repeatedly inconvenienced.

LAUSD (1)-23

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

Response: The alternative under consideration is the curb-lane, peak-hour only BRT system along Wilshire Boulevard. Construction associated with the proposed project consists of reconstructing the outside curb lane to remove the dips and cross street crowns in a 4-mile segment, as well as the construction of at-grade station platforms. Construction occurring on the affected street and sidewalk surfaces would be restored to reasonable smoothness.

As discussed in Section 3.18 of the Draft EIR, during the construction phase, students would not have access to construction sites since barriers would be installed on the construction sites such that the public is separated from work areas.

LAUSD (1)-24

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

Response: All trucks and construction vehicles will comply with the provisions in the California Vehicle Code, which includes stopping when red lights of school buses are flashing. The Construction Mitigation Plan includes a mitigation measure that states that construction specifications will stipulate that the Contractors Draft Traffic Management and Site Access Plan shall avoid schools and school walk routes. Section 3.13 states that, during

construction, pedestrian pathways would be cordoned off and protected from traffic and potential dangers that are typically associated with construction activities. Additionally, the Construction Mitigation Plan will include a mitigation measure which states that, should construction occur within 500 feet of a school, the MTA and its Contractor shall coordinate with the Los Angeles Unified School District (LAUSD) to ensure that any potential impacts associated with student/vehicular access to sidewalks/roads would be minimized. This measure includes coordinating with the LAUSD to determine alternate pedestrian routes during construction should construction activities affect designated school crosswalks. The Construction Mitigation Plan includes a measure which states that the MTA Contractor shall provide crossing guards during active construction to improve the safety of school children.

LAUSD (1)-25

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

Response: The issues raised in this comment have been addressed in Section 3.2 of the Final EIR. Please refer to Topical Response B for a description of the general traffic impacts associated with the proposed project. Also refer to Response to Comment LAUSD (1)-19 for a discussion of mitigation measures that will be provided in the Final EIR to address construction impacts.

LAUSD (1)-26

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

Response: The alternative under consideration is a curb-lane, peak-hour only BRT system on Wilshire Boulevard. During the construction phase, students would not have access to construction sites since barriers would be installed on the construction sites such that the public is separated from work areas (refer to Section 3.18). The Construction Mitigation Plan includes a mitigation measure that states that construction specifications will stipulate that the Contractors Draft Traffic Management and Access Plan shall avoid schools and school walk routes. Additionally, Section 3.13 indicates that, during construction, pedestrian pathways would be cordoned off and protected from traffic and potential dangers that are typically associated with construction activities. Mitigation Measure 3.14-3 in Section 3.14 of the Draft EIR states that the MTA shall sponsor a pedestrian safety education program, explaining acceptable methods to cross guideway lanes. Furthermore, the Final EIR will include a mitigation measure which states that, should construction occur within 500 feet of a school, the MTA shall coordinate with the Los Angeles Unified School District (LAUSD) to ensure that any potential impacts associated with student/vehicular access to sidewalks/roads would be minimized. This measure includes

coordinating with the LAUSD in determining alternate walk routes during construction should construction activities affect designated school crosswalks. The Construction Mitigation Plan also includes a mitigation measure which states that the MTA Contractor shall provide crossing guards during construction to improve the safety of school children. During the operations phase of the proposed project, Section 3.14 of the Draft EIR states that all pedestrian crossings along the Wilshire BRT route would be signalized, and appropriate signage would be installed. The signs would clearly indicate correct methods to cross.

Comment Letter 17: Los Angeles Unified School District, June 2001

LAUSD (3)-1 School traffic and pedestrian routes will be impacted by the activity at this project. The proposed project is close to school sites, and is on the pedestrian routes to many school sites. Construction and operation of this project will impact student/vehicular access to sidewalks/roads. Mitigation measures will be necessary to safeguard pedestrians/motorists. It is requested that the following mitigation measures to be incorporated in the final environmental document.

Response: Refer to Response to Comments LAUSD (1)-18 through LAUSD (1)-26 for a comprehensive discussion of the safety measures and considerations that will be implemented as part of the proposed project. In addition, pedestrian automatic gates will not be used along the Wilshire BRT alignment.

LAUSD (3)-7 LAUSD Transportation Branch, (323) 227-4400, must be contacted regarding the potential impact, if any, upon existing school bus routes. School buses must have access to affected school sites.

Response: The project under consideration is a curb-lane, peak-hour only BRT system on Wilshire Boulevard. The Construction Mitigation Plan includes a mitigation measure which states that, should construction occur within 500 feet of a school, the MTA and its Contractor shall coordinate with the Los Angeles Unified School District to ensure that any potential impacts associated with student/vehicular access to sidewalks/roads would be minimized.

LAUSD (3)-8 Contractors must guarantee that safe and convenient pedestrian routes to affected school sites are maintained.

Response: Section 3.13 states that, during construction, pedestrian pathways would be cordoned off and protected from traffic and potential dangers that are typically associated with construction activities. The Construction Mitigation Plan includes a mitigation measure that states that construction specifications will stipulate that haul truck staging areas and routes shall avoid schools and school walk routes. Additionally, the Final EIR will include a mitigation measure which states that, should construction occur within 500 feet of a school, the MTA and its Contractor shall coordinate with the Los Angeles Unified School District (LAUSD) to ensure that any potential impacts associated with student/vehicular access to sidewalks/roads would be minimized. This measure includes coordinating with the LAUSD to determine alternate walk routes during construction should construction activities affect designated school crosswalks. Additionally, the Final EIR Construction Mitigation Plan includes a mitigation measure stating that the MTA Contractor shall provide crossing guards during active construction to improve the safety of school children.

LAUSD (3)-9 Contractors must maintain ongoing communication with the administrators of the affected schools, providing sufficient notice to forewarn children and parents when existing pedestrian and vehicular routes to schools will be impacted.

Response: The Construction Mitigation Plan includes a mitigation measure which states that, should construction occur within 500 feet of a school, the MTA shall coordinate with the Los Angeles Unified School District (LAUSD) to ensure that any potential impacts associated with student/vehicular access to sidewalks/roads would be minimized. This measure includes coordinating with the LAUSD to determine alternate walk routes during construction should construction activities affect designated school crosswalks.

LAUSD (3)-10 Appropriate traffic controls (signs and signals) must be installed as needed to ensure pedestrian and vehicular safety.

Response: Section 3.13 states that, during construction, pedestrian pathways would be cordoned off and protected from traffic and potential dangers that are typically associated with construction activities. Additionally, the Construction Mitigation Plan includes a mitigation measure which states that, should construction occur within 500 feet of a school, the MTA shall coordinate with the Los Angeles Unified School District (LAUSD) to ensure that any potential impacts associated with student/vehicular access to sidewalks/roads would be minimized. This measure includes coordinating with the LAUSD to determine alternate walk routes during construction should construction activities affect designated school crosswalks. Additionally, the Construction Mitigation Plan includes a mitigation measure which states that, should construction occurs within 500 feet of a designated school crosswalk, the MTA Contractor shall provide crossing guards during active construction to improve the safety of school children.

LAUSD (3)-11 Construction scheduling and haul routes should be sequenced to minimize conflicts with pedestrians, school buses and cars at the arrival and dismissal times of the school day. Haul trucks are not to be routed past affected school sites, except when school is not in session.

Response: The Construction Mitigation Plan provides that haul truck staging areas and routes would avoid schools.

LAUSD (3)-12 No staging or parking of construction vehicles, including vehicles to transport workers, on streets adjacent to affected school sites.

Response: The Construction Mitigation Plan includes a mitigation measure which states that construction specifications shall stipulate that staging or parking of construction vehicles, including vehicles that transport workers, on streets adjacent to the affected school sites shall be prohibited wherever feasible.

LAUSD (3)-13 Funding for crossing guards to be provided when safety of children is compromised by construction-related activities at impacted crossings.

Response: The Construction Mitigation Plan includes a mitigation measure which states that, should construction occur within 500 feet of a school, the MTA shall coordinate with the Los Angeles Unified School District (LAUSD) to ensure that any potential impacts associated with student/vehicular access to sidewalks/roads would be minimized. This measure includes coordinating with the LAUSD to determine alternate walk routes during construction should construction activities affect designated school crosswalks. Additionally, the Construction Mitigation Plan includes a mitigation measure which states that the MTA Contractor shall provide crossing guards during active construction to improve the safety of school children.

LAUSD (3)-14 Funding for a flag person to be provided as needed where construction-related activities compromise the safety of pedestrians and/or motorists while traveling to and from school.

Response: The Construction Mitigation Plan includes a mitigation measure which states that, when feasible, the MTA Contractor shall provide a flagger(s) where construction-related activities compromise the safety of pedestrians and/or motorists.

LAUSD (3)-15 Barriers must be constructed as needed to minimize trespassing, vandalism, short-cut attractions and attractive nuisances.

Response: Construction Mitigation Plan provides that safety and security during construction would consist of protecting construction sites and equipment/material storage areas from vandalism and theft. Barriers would be installed on construction sites such that the public is separated from construction areas. This barrier would minimize trespassing, vandalism, and short-cut attractions.

LAUSD (3)-16 *Security patrols should be funded and provided to minimize trespassing, vandalism, and short-cut attractions.*

Response: Construction Mitigation Plan provides that safety and security during construction would consist of protecting construction sites and equipment/material storage areas from vandalism and theft. This section also indicates that material and equipment storage sites would require perimeter patrols and night security personnel.

LAUSD (3)-17 *Fencing should be installed to secure construction equipment to minimize trespassing, vandalism, and short-cut attractions.*

Response: Construction Mitigation Plan provides that safety and security during construction would consist of protecting construction sites and equipment/material storage areas from vandalism and theft. Barriers would be installed on construction sites such that the public is separated from construction areas. These barriers would minimize trespassing, vandalism, and short-cut attractions.

Comment Letter 18: Los Angeles Unified School District, June 2001

LAUSD (4)-3 *It should, however, be noted that the analyses do not specifically analyze the air quality impacts to all schools located within the immediate vicinity of all the alternatives.*

Response: The Los Angeles Unified School District comments that the analyses in the Draft EIR does not analyze the air quality impacts to all the schools located within the immediate vicinity of all the alternatives.

The alternative under consideration is a curb-lane, peak-hour only BRT system along Wilshire Boulevard. Five schools are located within the immediate vicinity of the Wilshire BRT alignment. These schools include Cathedral Chapel School (located between 8th Street, Dunsmuir Avenue, and Cochran Avenue), a private school on 6th Street and Van Ness Avenue, Good Shepard School (located between Linden Drive, McCarthy Drive and Charleville Boulevard), and Horace Mann School (located on 8701 Charleville Boulevard), and Burroughs Middle School.

Localized air quality impacts are discussed in Section 3.8B of the Draft EIR. As discussed in this section, operational air quality impacts associated with a project is generally best reflected through the estimated changes in CO concentration. The air quality analysis in the Draft EIR discusses CO concentrations at sidewalk receptors adjacent to the street intersections that would be most significantly affected by the proposed project (e.g., having a level of service (LOS) of E or F under project conditions). Seven of these sidewalk receptors are located along the BRT alignment on Wilshire Boulevard. The schools within the vicinity of the Wilshire BRT alignment are near street intersections that are less congested, with LOS of A, B, C or D. Since CO concentrations are not anticipated at the studied intersections, it is not anticipated schools that are located near less congested intersections would be significantly impacted by CO concentrations.

LAUSD (4)-4 *Given the proximity of some schools to the proposed Maintenance yard, staff is particularly concerned about potential air toxics that would be emitted from the Maintenance Yards. This concern is based on the fact that the project description and the air quality section of the document do not specifically describe the exact operational characteristics, types of potential air pollutants/contaminants, and toxics that would be associated with maintenance activities. The analysis does not specifically quantify nor characterize the pollutants from maintenance activities.*

Response: The Los Angeles Unified School District (LAUSD) is concerned about the potential air toxics that would be emitted from the proposed maintenance yards. The LAUSD also states that the project description and the air quality section of the document do not specifically describe the exact operational characteristics, types of potential air pollutants/contaminants, and toxics that would be associated with maintenance activities. Additionally, the air quality analysis does not specifically quantify nor characterize the pollutants from maintenance activities.

Site #2, as identified in the Draft EIR, has been selected as the bus maintenance yard for the proposed project. This site is located in an industrial area away from area schools. It should further be noted that "air toxics" are not regulated by the California Air Resources Board. The buses acquired for the proposed project would be fueled by clean natural gas and would not be anticipated to emit "air toxics." Bus maintenance facilities involve various operations that emit air pollutants. These operations include engine and vehicle repair, painting, and degreasing, and vehicle cleaning. Chemicals used in these activities consist of paint, lubricants, degreasers, cleaning solvents and refrigerants. These chemicals contain volatile organic compounds (VOCs) and hazardous air pollutants (HAPs), such as asbestos and trichlorethylene. However, most of the air pollutants are emitted from idling buses, particularly during the warm-up of approximately 70 to 80 articulated vehicles in the early morning (between 5:00 to 7:00 a.m.). The LAMTA has in place a policy of limiting warm up to 90 minutes per bus. As discussed in Section 3.8B of the Draft EIR, the warm-up of buses are expected to generate emissions of carbon monoxide (CO), nitrogen oxides (NO_x, reactive organic gases (ROG), and particulate matter (PM_{10}).

The project is located in a non-attainment area for CO and PM_{10}, as is the entire Los Angeles Air Basin. Increases in concentrations of these two pollutants could potentially impact the surrounding areas of the bus maintenance facilities, just as the idling of school buses impacts schoolyard air. Using the U.S. EPA ISC3 air dispersion model, concentrations of CO and PM_{10} were determined. It is estimated that the idling of buses would result in a one-hour CO concentration of approximately 3.71 parts per million (ppm) at any of the potential bus maintenance yards. The eight-hour CO concentration is anticipated to be approximately 2.60 ppm. (The estimated CO concentration was added onto year 2020 one- and eight-hour ambient CO concentration of 3.70 and 2.60 ppm.) CO concentrations are not anticipated to exceed the State one- and eight-hour CO standards of 20.0 ppm and 9.0 ppm, respectively, rendering the impact not significant. In regards to PM_{10} emissions, the idling of buses would result in a 24-hour average PM_{10} concentration of approximately 42.83 micrograms per cubic meter (ug/m^3). (The estimated PM_{10} concentrations at the bus maintenance yards include the ambient PM_{10} concentration of 42.80 ug/m^3.) The idling of buses at the bus maintenance yard would not exceed the State 24-hour standard of approximately 50 ug/m^3. Since concentrations of CO and PM_{10} are not expected to exceed any of the State standards and concentrations of these pollutants decreases as the distance increases, schools and other nearby sensitive receptors that are located within close proximity of any of the potential bus maintenance facilities would not be significantly impacted by CO or PM_{10}. The air quality impacts of modern transit maintenance are further reduced by the use of CNG buses, air hose ventilation within the shop, rules against extended idling, replacement of worn equipment, and sensitive site design.

Comment Letter 19: Los Angeles Unified School District, June 2001

LAUSD (5)-4 *The safety of children during construction and operation of the Bus Rapid Transit [BRT] or Light Rail Transit [LRT] is the District's primary concern. The addition of many new traffic signals with pedestrian signals within ½ mile of District schools will encourage safe crossing practices. Pedestrian crossing gates in the vicinity of all schools along the Exposition alignment should help reduce accidents. Nevertheless, safety concerns remain, and several school principals have requested crossing guards during school hours. The District asks that the MTA reassess the need for crossing guards at times when students are walking to and from school.*

Response: The alternative under consideration is the curb-lane, peak-hour only BRT system along Wilshire Boulevard. No new crosswalks or traffic intersections would be created by the project, and the number of buses is not expected to significantly increase over existing levels. The Construction Mitigation Plan includes a mitigation measure which states that, if designated school crosswalks are located on Wilshire Boulevard during project operations, the MTA Contractor shall provide crossing guards such that the safety of school children is ensured.

LAUSD (5)-7 *Please consider whether pedestrian crossing signals should be adjusted to allow longer crossing times, particularly in areas and during the hours where school children cross the transit corridor en route to and from school. A particular problem occurs on Wilshire Boulevard in the vicinity of Wilton Place, where many children live north of*

Wilshire and must cross to reach the school which is south of Wilshire. The time allowed for crossing is too short. This mitigation should also be considered at Sepulveda Boulevard, which many children cross en route to and from the two elementary schools.

Response: Traffic signal timing will be coordinated with the City of Los Angeles Department of Transportation (LADOT) and will provide adequate time for pedestrians to cross the street, per LADOT standards. LAUSD may wish to contact LADOT to further discuss pedestrian crossing phases. At signals adjacent to schools along the new Wilshire BRT, the LADOT should be requested to consider pedestrian signal timing to determine if adjustments are necessary.

LAUSD (5)-33 The Draft EIR identified six sites as candidates for a maintenance facility for approximately 80 vehicles. Two of these sites are close to schools, and the Draft EIR acknowledges that due to the location near residential areas, both noise and air impacts may be significant. However, the Draft EIR had minimal discussion of these impacts; no noise measurements were taken, and no analysis of the air impacts was provided.

Response: The Division #10 Expansion site has been as the preferred bus maintenance yard for the proposed project. This property is located in an industrial area not adjacent to residences or other sensitive receptors. The introduction of a bus maintenance facility at this site would not result in any substantial noise impacts and would only result in either a negligible amount or represent a reduction in emissions from the site. Therefore, no significant air quality or noise impacts would result from the proposed bus maintenance yard on residences, schools, or recreation sites.

LAUSD (5)-36 What kind of emissions would be coming from the maintenance yard?

Response: Refer to Response to Comment LAUSD(4)-4 for a discussion of pollution emissions from the proposed maintenance yards.

LAUSD (5)-38 Air impacts were not assessed and significant impacts were not mitigated. The Draft EIR provided no measurements of maintenance yard emissions, but concluded for the Exposition Right-of-Way site that this yard "would have relatively greater significance than the yard sites situated in industrial areas." For the South Park Shops site the Draft EIR concluded that "the proximity of numerous sensitive land uses strongly suggests that the increased emissions would be significant" yet immediately following this statement on pages 3.8B-28, the Draft EIR states: "Given the air quality operations impacts are less than significant, no mitigation is proposed." The Executive Summary did not include the text's acknowledgment of significant impacts. An EIR should focus on possible significant impacts; this EIR has minimized or overlooked significant impacts. Air impacts at all schools close to these two maintenance yards should be assessed, and mitigation provided.

Response: Refer to Response to Comment LAUSD (5)-33 for a discussion of the air quality impacts of the bus maintenance yard. The Seventh Park Shops are not being considered any longer as a site for the Bus Maintenance Yard.

LAUSD (5)-45 The Draft EIR claims that mitigation measure 3.14-15 ("Bus travel routes will be designed to avoid residential streets") will reduce the safety and security impacts of the maintenance yard. It is difficult to comprehend how this mitigation measure will make any difference in the case of the maintenance yard proposed close to Nevin Elementary School. The designation of bus routes to avoid residential streets does not have any bearing or relation to minimizing potential project impacts on the many school children who walk across this right-of-way en route to and from Nevin Elementary School. Therefore the Draft EIR must show how potential impacts to Nevin Elementary School students will be reduced.

Response: Refer to Response to Comment LAUSD (5)-33 with regard to siting of the proposed maintenance yard. No schools and residential areas are within close proximity to the proposed site.

LAUSD (5)-46 *The Draft EIR acknowledges significant impacts to community facilities, yet provides no mitigation. On page 3.15-16, the Community Facilities analysis of the Draft EIR acknowledges the impacts from the two maintenance yards near the schools are potentially significant, yet no mitigation is provided.*

Response: The Los Angeles Unified School District comments that the Community Facilities analysis of the Draft EIR acknowledges significant impacts to community facilities, yet no mitigation is provided. Refer to Response To Comment LAUSD (5)-33 regarding siting of the bus maintenance yard.

LAUSD (5)-47 *The Executive Summary does not identify the impacts which are acknowledged in the text of the Draft EIR. The Executive Summary does not identify the potentially significant safety and security impacts on children walking to and from school, though they are generally acknowledged in the text. These are serious impacts. They must be mitigated, not overlooked. The Executive Summary also does not identify the potentially significant air, noise, and community facilities impacts that the Exposition Right-of-Way and the South Park Shops maintenance yards would have on nearby schools. All of these impacts were acknowledged in the text, but omitted from the Executive Summary. In this respect, the analysis of two of the proposed maintenance sites in the Draft EIR is inadequate because the reviewing public was not adequately informed of significant impacts.*

Response: The Los Angeles Unified School District states that the Executive Summary of the Draft EIR does not identify impacts that are acknowledged in the text of the Draft EIR.

The Executive Summary was prepared to provide a brief discussion of the proposed project and the potential impacts for policy makers. It was prepared for those parties not interested in reading the entire Draft EIR document. For those interested in additional detail about the proposed project and its impacts, the full Draft EIR document was made available in numerous libraries. The Exposition right-of-way and South Park maintenance facility are not part of this EIR.

LAUSD (5)-48 *It is the District's role to ensure that the construction of the Mid-City/Westside Transit Corridor does not put the safety and health of students and school staff at risk. The comments above are provided to clarify the impacts of the various alternative alignments under consideration, and to work with the MTA on mitigation measures which may be needed in planning for a safe alignment. Please contact me if I can provide any additional information to facilitate your review of the District's concerns.*

Response: Refer to Responses to Comments LAUSD (5)-4, (5)-7, (5)-33, 95)-36, (5)-38, (5)-45, (5)-46, and (5)-47 for detailed responses to each specific issue raised.

Comment Letter 21: Southern California Association of Governments, June 2001

SCAG (1)-7 *During the time this Draft EIR for the proposed Project was being prepared, SCAG adopted the 2001 RTP (APRIL 2001). References made to the 1998 RTP should be updated and/or changed to reflect the 2001 RTP in the Final EIR for the proposed Project.*

Response: Section 15125 of the CEQA Guidelines provides that an EIR must include a description of the physical environmental conditions in the vicinity of the project, as they exist at the time the Notice of Preparation is published. As required by CEQA the environmental impact analyses in the Draft EIR were predicated on the date the NOP was published, which in this instance was May 2000.

SCAG (1)-10 *The Final EIR should address the relationships (consistency with core policies and support of ancillary policies) to SCAG's Regional Comprehensive Plan and Guide and discuss any inconsistencies between the proposed project and applicable regional plans.*

Response: The Draft EIR provided an analysis of the relationships and consistency with core policies and support of ancillary policies to SCAG's Regional Comprehensive Plan and Guide as indicated. As noted on Pages

3.5-12 to 3.15-13 of the Draft EIR, the proposed project is consistent with SCAG Growth Management Policies 3.01, 3.03, 3.04, 3.05, 3.08, 3.09, 3.10, 3.11 through 3.23, and 3.27, 4.01, 4.02, 4.03, 4.04, 4.06, 4.11, 4.15, 4.16, and regional growth forecasts that reflect 1998 RTP Population, Household, and Employment SCAG forecasts for Westside cities and City of Los Angeles subregions.

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

Response: Refer to Response to Comment SCAG (1) through SCAG (1)-7 and (1)-10 for a discussion of consistency of the proposed project with SCAG's core and ancillary policies in the Regional Comprehensive Plan and Guide and the Regional Transportation Plan.

SCAG (1)-45 All mitigation measures associated with the proposed Project should be monitored in accordance with CEQA requirements.

Response: Please refer to the Mitigation Monitoring Plan which is hereby incorporated by reference as fully set forth. All mitigation measures associated with the proposed project will be monitored in accordance with the requirements of CEQA and NEPA.

Comment Letter 23: City of Beverly Hills, June 2001

CBH (1)-4 The projected diversion of traffic from Wilshire Boulevard to residential streets (page 3.2-54) is a major safety concern for residents.

Response: As noted, the Draft EIR discloses the potential impacts on residential streets due to diversion of traffic from Wilshire Boulevard. Mitigation measures are proposed in Section 3.2 of the Final EIR to address these potential impacts. As with any change in the transportation system, neighborhood traffic controls may be needed. MTA has set aside $3.3 million for cities to monitor and treat neighborhood impacts.

CBH (1)-5 The draft EIR estimates of the loss of travel lanes will significantly impact Wilshire Boulevard and adjacent arterials, including a 7% increase on Olympic Boulevard and an 8% increase on Third Street (figure 3.2-11). The City is concerned that the proposed mitigation measures (Section 3.4) to upgrade traffic signals with "next generation" traffic signals and intersection improvements will be unable to mitigate the loss of travel lanes.

Response: The loss of travel lanes is mitigated by a number of factors including the referenced "next generation" traffic signals and intersection improvements, as well as the enhanced person-carrying capacity of the Wilshire Corridor due to the dedicated transitway and enhanced bus service. The Environmental Evaluation summarized in the Executive Summary discloses that the traffic and circulation impacts may not all be reduced to the less-than-significant level (refer to Final EIR Section 3.2). Significant impacts are forecast to remain on the I-10 Freeway for the Wilshire BRT Alternative. The impacts to the arterial street system are forecast to be less than significant, but only "after diverted motorists redistribute themselves to new routes where intersection improvements have been implemented." On page ES-32 of the Draft EIS/EIR, the locations where residual impacts will remain at studied intersections following implementation of the project alternatives and associate mitigation are listed. The project as currently proposed would only have impacts during peak periods, not 24 hours, as previously estimated.

CBH (1)-6 The mitigation measure to add a "southbound protected left-turn phase" at the Wilshire Blvd./Beverly Drive intersection (page 3.2-101) may not be technologically feasible due to angles of the roadway.

Response: The angle of the Beverly Drive approach to the Wilshire Boulevard intersection would not preclude installation of a protected left-turn phase. Proper placement of signal heads on mast arms would allow such a protected left-turn signal indication to be visible to drivers for them to negotiate the turn safely.

CBH (1)-7 *Also, it may impact northbound left-turn movements from northbound Beverly Drive to Wilshire Boulevard.*

Response: The addition of the protected left turn phase improved the level of service at the intersection in the traffic analysis completed for the project and would not be expected to negatively impact northbound left turn movements.

CBH (1)-8 *The City has strong concerns with the Draft EIR estimate that "significant, unavoidable impacts remain at La Cienega/Wilshire after mitigation measures are implemented" (Executive Summary page 32) for all alternatives analyzed.*

Response: The Draft EIR/EIS discloses the impact of the proposed project on the intersection of La Cienega and Wilshire Boulevards, as noted in this comment. No mitigation measure could be identified at this location due to the built-out nature of this area. This unavoidable significant impact is one that will require a Statement of Overriding Considerations by the MTA Board. Implementation of this component of the project would be subject to the review and approval of the City of Beverly Hills.

CBH (1)-10 *The Draft EIR does not include an analysis of how high capacity buses would impact mixed-flow traffic if the BRT project were constructed with a terminus at the City of Beverly Hills.*

Response: Buses are running the entire length of the 26-mile route from Santa Monica through to Montebello and will not have a terminus in Beverly Hills.

CBH (1)-11 *We note the "significant" impact of a 1.25% volume increase in the A.M. peak hour on the Santa Monica Freeway (I-10) that cannot be mitigated.*

Response: The comment reiterates a finding of the Draft EIR/EIS. The document clearly discloses that the proposed project will have a significant impact on the Santa Monica Freeway. This unavoidable significant impact is one that will require a Statement of Overriding Considerations by the MTA Board.

CBH (1)-12 *The Draft EIR does not include an analysis of the impacts to the City of Beverly Hills if the BRT project were constructed with a terminus at the City of Beverly Hills.*

Response: The Draft EIR does not include the analysis of an alternative with a terminus at the Beverly Hills City Limits because this alternative is not, and has never been, proposed. Even if the dedicated lane on Wilshire Boulevard were to end at the Beverly Hills City limits, the BRT would continue through Beverly Hills in mixed-flow traffic as the existing Metro Rapid Bus does.

CBH (1)-13 *In addition to the safety issues, diverted traffic resulting from the project will have significant impact to residential quality of life. At the request of residents, the City has recently embarked on a Neighborhood Traffic Management project for the neighborhood bounded by Wilshire/Olympic Boulevards and Beverly/Doheny Drives to address "non-local" traffic currently using residential streets to bypass congested arterials. Far more aggressive measures would be needed to mitigate the impacts of a BRT which would have significant impacts for emergency vehicle access.*

Response: The Final EIR discloses the impacts of the project on residential streets (Section 3.2) and proposes a neighborhood traffic mitigation program (Mitigation Measure 3.2-5) to reduce those impacts. The neighborhood traffic mitigation measures to be funded by the MTA would supplement and complement those planned by the City of Beverly Hills.

CBH (1)-14 *The City questions the conclusion that BRT option 1b, which would use the curb lanes, would have "no impact" on residential side streets.*

Response: Alternative 1B will not result in the loss of any existing left turn or right turn opportunities along Wilshire Boulevard, so there will be no reason for drivers to have to circle a block to complete a turning maneuver

as is the case with Alternative 1. This will eliminate the likely impact on the residential side streets. The traffic diversion from Wilshire Boulevard due to the loss of the curb lane for through travel will be to parallel arterial streets as some of the longer distance through trips shift away from Wilshire Boulevard.

CBH (1)-15 Concerns remain that the loss of parking on Wilshire Boulevard will increase on-street parking demand in residential areas, which will likely result in requests for more restrictive preferential parking zones.

Response: If implemented as a peak-period-only bus lane with peak-period parking prohibitions, this would not cause a significant parking impact, since parking is already prohibited in most blocks along Wilshire Boulevard during peak-hours and peak period parking prohibitions are common on many arterials throughout the region and have not caused significant impacts. It is not anticipated that the project will result in the need for more restrictive preferential parking programs on residential streets.

CBH (1)-17 The Draft EIR does not include a budget for new parking facilities to replace the estimated 249 metered parking spaces on Wilshire Boulevard within the City of Beverly Hills (Figure 3.3-3) that would lost as a result of a dedicated bus lane.

Response: The project budget did include the cost of replacement parking on a one-for-one basis (refer to Table 5-1D on Page 5-4 of the Draft EIR). However, the proposed project would no longer result in the loss of on-street parking in Beverly Hills, so this mitigation measure will no longer be required.

CBH (1)-18 The final EIR should thoroughly analyze and address of all the impacts referenced. Thank you for the opportunity to comment on the DEIS/DEIR.

Response: Please refer to the specific responses concerning analysis of the referenced impacts.

Comment Letter 24: City of Beverly Hills, June, 2001

CBH (2)-5 Loss of travel lanes will significantly impact congestion on Wilshire Boulevard and adjacent streets and roads.

Response: Section 3.2 of the Draft EIR addresses the traffic impacts at intersections along Wilshire Boulevard and discloses the impacts to adjacent streets and roads. Significant impacts were identified and mitigation measures consisting of advanced traffic signal systems and intersection improvements were proposed to mitigate most, but not all significant traffic impacts. Refer also to Topical Response B for a discussion of the loss of a travel lane along Wilshire Boulevard.

CBH (2)-7 High capacity buses would impact mixed-flow traffic flow if the BRT project were constructed with a terminus at the City of Beverly Hills.

Response: Section 3.2 of the Draft EIR discloses the impacts of converting one mixed flow lane to a dedicated bus lane for high-capacity buses. It is not proposed that the project have a terminus in Beverly Hills, but rather that it extend to downtown Santa Monica.

Comment Letter 25: City of Culver City, June 2001

CCC (1)-18 Pages 1–8.—Add W.L.A. College as an Activity Center and Destination. It is mentioned on Page 3.5-6, Table 3.5-1 as such.

Response: West Los Angeles College is acknowledged as an activity center and destination, and will be reflected in the Exposition LRT Final EIS/EIR (separate project).

CCC (1)-27 Page 3.1-2, Section 3.1.3. As there is no preferred alternative in this document, delete the words "proposed project and the" contained in the last sentence of the second paragraph.

Response: The text has been revised in the Final EIR to reflect the above text change.

CCC (1)-28 Page 3.1-3, 3.1.4, Significance Categories. The Draft EIR states there are impacts that cannot be fully mitigated to less than significant levels. The Draft EIR must clearly list these significant and unavoidable impacts and expand upon them under each issue area. As is discussed in the following City comments, the Draft EIR does not clearly identify all the significant impacts. As you are aware, when approving a project with unavoidable significant environmental effects, CEQA/NEPA requires the preparation of a Statement of Overriding Considerations/A Record of Decision explaining why the Board is willing to accept each significant effect. The statement must identify specific overriding economic, social, legal, and technical or other project aspects supporting the decision. Although the Statement of Overriding Considerations is not required until the project approval stage, it would be beneficial to know and be informed as to how these significant and unavoidable impacts will mitigated to the extent possible at this draft stage.

Response: The commenter is correct in stating that the Draft EIR must clearly list significant and unavoidable impacts and expand upon them under each issue area. Each specific comment is responded to in detail below. If the Board approves the project, A Statement of Overriding Considerations/Record of Decision will be prepared explaining the reasons for accepting any significant and unavoidable environmental impact, and how the impacts will be mitigated to the extent possible.

CCC (1)-43 Page 3.4-1. Environmental justice issues must be discussed in detail in the Socioeconomic Section. The discussion of any disproportionate impacts to high minority and low-income populations on Page 5-17, Financial Analysis, should first be discussed in the Socioeconomic Section.

Response: Please note this response pertains only to the Wilshire BRT as amended and described at the beginning of this document. Discussion of Environmental Justice issues as related to the Exposition LRT are not the subject of this document and will be analyzed and discussed in a subsequent environmental document. As discussed in Section 4.7 of the Final EIR, the proposed project would result in an improvement to the public transportation serving the area, which is characterized by high transit dependency and relatively high levels of transit services provided. The Wilshire BRT follows existing public roads and is contained within existing limits of the Wilshire Boulevard right-of-way. According to Tables 3.4-2, 3.4-4, and 3.4-5 of the DEIS/EIR, a large percentage of the households in the Study Area do not have a vehicle compared to Los Angeles County as a whole. Existing transit usage within the Study Area is proportionally higher than other areas of Los Angeles County. As specifically noted on Page 3.4-16 of the Draft EIR, the Wilshire BRT would result in increased transit service, increasing the mobility and convenience to the transit-dependent population. Therefore, impacts to transit-dependent populations would be beneficial as a result of Wilshire BRT implementation. In addition, an Environmental Justice analysis for the Wilshire BRT is provided in Section 4.7 of the Final EIR.

Comment Letter 26: City of Los Angeles, June 2001

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

Response: Please refer to the specific responses provided for to each the key City concerns, where applicable to the Wilshire BRT. The Exposition portion of the project has been deleted.

CLA (1)-2 Modeling Projections: The trip re-distribution projections for the Wilshire Bus Rapid Transit (BRT) alternative and the modeling data, assumptions, methodology and execution do not seem reasonable. For example, the peak hour traffic along Sepulveda Boulevard screenline is projected to increase by less than 10% from 1998 to 2020 in the morning and afternoon peak hours. However, with approved development projects in the Westside, including

Playa Vista, expansion of Loyola Marymount University and Hughes Entertainment Center, traffic on Sepulveda Boulevard and intersecting streets (Manchester, Centinela, Jefferson, Culver and Washington) is expected to increase at a rate much higher than 10% by 2020. The traffic analysis showing a one or two second increase in delay after removing one out of three lanes (33%) on Wilshire Boulevard demonstrates a serious flaw in methodology. The analysis technique used does not adequately reflect the BRT alternative's impacts, and further analysis must be made.

Response: The MTA Travel Demand Forecasting Model includes socioeconomic data inputs that are consistent with SCAG forecasts for 2020. These forecasts have been reviewed by all local jurisdictions in the SCAG region and reflect the level of development anticipated by the local jurisdictions, including the development projects noted in this comment. As noted on page 3.2-28 of the Draft EIR, growth in traffic volumes in the north-south direction across three screenlines varies from 14% to 23%, with individual facilities included in those screenlines exhibiting even more variation. Sepulveda Boulevard can only absorb a limited amount of additional traffic because it is near capacity now. Similar capacity-reaching effects occur on the Santa Monica Freeway as noted on page 3.2-28. As the region approaches complete gridlock, transit improvements, BRT, diamond lands, and using abandoned Pacific Electric rights of way will be critically important to maintaining local and regional mobility.

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

Response: The MTA model has been subjected to rigorous peer review and is certified by the FTA for use in federal environmental documents. It is the only model available for use in the City of Los Angeles that conducts multi-modal analysis of alternatives and reflects the impacts of transit projects on mode split, operating speed, route diversion, transit patronage and auto usage. The model provides an accurate basis for the comparison of regionally significant transit investments by illustrating the relative changes in patronage on transit services and traffic volumes on arterial streets caused by implementing transit alternatives.

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

Response: The existing level of service calculations at intersections along Wilshire Boulevard were based on existing traffic counts, not model volumes. For future conditions, the model forecasts were used to identify the relative level of growth on Wilshire Boulevard associated with the alternative. Those growth factors were then used to factor up the existing counts. This eliminates any issues associated with under-forecasting existing conditions. The use of the model to obtain growth factors reflective of the alternatives presents impacts associated with the alternatives under consideration.

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

Response: As noted in Table 1 developed by LADOT, the model forecasts the volumes on the I-10 freeway quite closely at many of the screenlines. At the location west of Western Avenue, the model forecasts 21,510 and the counts are 21,900. At the location east of La Cienega, the model forecasts 16,997 and the counts are 17,700. At the western end of the modeling area in Santa Monica, the model under-forecasts the freeway volumes, but this

is not the area where the proposed project would be expected to have an impact on the freeway system, since no physical changes to Wilshire Boulevard are proposed in the Santa Monica area.

CLA (1)-6 Similarly, as reflected in the Traffic Model Tables, the model underestimates traffic volumes along other streets. Therefore, the level of service (LOS) calculations are not indicative of actual operating conditions, which explains why the DEIS/DEIR lists so few intersections operating at LOS E and F.

Response: The operating conditions at signalized intersections were based on actual turning movement counts at the intersections, not raw model data, and as such they represent actual existing conditions in the field. Future operating conditions at intersections were derived from growth factors from the model runs applied to the existing turning movements and therefore reflect the relative differences associated with the alternatives.

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

Response: Traffic growth forecast are based on the Southern California Association of Governments adopted forecasts for population employment and trip generation. Tables 3.2-7 and 3.2-8 on Pages 3.2-29 and 3.2-31, respectively, of the Draft EIR provide the forecast data on growth across arterial screenlines. Table 3.2-7 illustrates that growth in traffic across the screenlines between 1998 and 2020 varies from 8.41% to 25.56%. The screenline with the lowest growth is the north-south screenline east of Sepulveda Boulevard. There is limited ability for additional traffic to be added to the major streets crossing this screenline because virtually every east-west street crossing Sepulveda is near or at capacity. The objective of the Draft EIR analysis is to portray LOS with and without the BRT project.

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

Response: Figure 3.2-11 on Page 3.2-37 of the Draft EIR illustrates the percentage changes in P.M. peak-hour traffic volumes on roadways parallel to Wilshire Boulevard as a result of the diversion of traffic from Wilshire Boulevard due to the loss of a travel lane. The percentage changes vary from 1% to 8% of the parallel street volume. The parallel street segments that will be significantly impacted by the forecast diversion are shown on Figures 3.2-14 and 3.2-15. As a result of the identification of these significant impacts on parallel facilities, the proposed project includes the mitigation measure to implement the Advanced Traffic Control System at 433 signalized intersection in Los Angeles and 23 intersections in Beverly Hills. The EIR has adequately disclosed and mitigated the impacts of the diversion of traffic to parallel streets.

In preparing the response to this question, which had been raised verbally by LADOT in meetings on the proposed project, the EIR consultants conducted an analysis of the number and percentage of through vehicles on Wilshire Boulevard between Western Avenue and Santa Monica Boulevard. The results of the analysis indicate that there is a significant amount of long-distance through travel on Wilshire Boulevard. During A.M. and P.M. peak commute hours, approximately 13 to 14 percent of the vehicles on Wilshire Boulevard travel the entire 5.8-mile segment between Western Avenue and Santa Monica Boulevard. This finding supports the model forecasts that indicate that if a capacity constraint were imposed on Wilshire Boulevard, a significant portion of the traffic on Wilshire Boulevard does not have to be on that corridor and could shift to alternate parallel routes. This finding also supports the proposed BRT in that residents will use a fast Bus Rapid Transit System between Western Avenue and Santa Monica.

CLA (1)-9 Similarly, Alternative 3 is expected to reduce traffic on Wilshire Boulevard by 47% in the A.M. peak hour and 46% in the P.M. peak hour. However, the study indicates that traffic on parallel east-west highways will increase by approximately 6% in the A.M. peak hour and 4% in the P.M. peak hour, which is unreasonably low.

Response: Please refer to Response to Comment CLA (1)-8 for a discussion of traffic assignments.

CLA (1)-10 The travel demand forecasting model must be accurately re-calibrated and validated to provide a better representation of existing traffic volumes on major arterials. Additionally, the model results indicates (sic) that there is an imbalance in the gravity model for the future scenarios, and this should be examined and corrected.

Response: Please refer to Response to Comment CLA (1)-3 for a discussion of MTA's Travel Demand Forecasting Model. The model was rerun with the project and no project scenarios. It is unclear what the commenter is referring to when stating that "the model results indicates that there is an imbalance in the gravity model for the future scenarios." The model results appear reasonable to the MTA modeling staff and the EIR consultants.

CLA (1)-14 Existing DOT data does not support the LOS conditions presented in the DEIS/DEIR. Wilshire Boulevard is one of the most congested corridors in the City, with numerous intersections currently operating at LOS E or F during morning and evening peak periods. Among the 158 study intersections along the corridor, the DEIS/DEIR states that only 28 intersections are currently operating at LOS E or F during peak periods. This is an unrealistically low number. Major intersections that traditionally operate at LOS E or F levels, such as Wilshire/Westwood and Wilshire/Beverly Glen, were not included in this list of LOS E and F intersections. In order to validate LOS figures for current conditions, recalculations of LOS values using the Highway Capacity Manual's (HCM) delay methodology should be performed for each of the 158 study intersections for both morning and evening peak periods.

Response: The LOS calculations were based on existing peak-hour traffic counts collected at all of the study intersections, using the HCM delay methodology as suggested in this comment. The intersection phasing and timing plans for the intersections were provided by LADOT. The LOS calculations have all been provided to LADOT for their review and are correct.

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

Response: The MTA is the lead agency in the County of Los Angeles for the Congestion Management Program and has adopted the 2% change in v/c threshold for traffic impact studies throughout the County. This

same 2% threshold has been used by the MTA in previous EIR/EIS's for transportation facilities in the City of Los Angeles and the County and is contained in the adopted CMP.

CLA (1)-17 Curb lanes and BRT bus lanes should be a minimum of 12 feet in width (10.5 foot bus lanes are unacceptable). Lanes adjacent to raised medians and to bike lanes should be a minimum of 11 feet in width.

Response: The proposed Wilshire BRT does not affect or change the width of traffic levels on Wilshire Boulevard. Buses will run in the same lanes that they currently utilize.

CLA (1)-19 The use of "six inch concrete curb or four-inch BOTs Dots" to separate BRT lanes is unacceptable. Only white thermoplastic striping may be used to separate and designate lanes of traffic.

Response: White thermoplastic striping will be specified. The City of Los Angeles will review all construction drawings and approve these specifications.

CLA (1)-21 BRT operation will receive signal "priority" only and not "preemption". "Preemption" is only used for LRT gated crossings at signalized intersections. All other forms of street running LRT use "priority" only.

Response: The analysis of the impacts of the proposed project was conducted based on the assumption that the BRT project would receive "priority," not "preemption," as noted in this comment.

CLA (1)-22 The introductions of protected-only left and right turn phases to the streets crossing the busway will significantly reduce the time available to the bus phase, thereby increasing delays for bus operations as well as mixed flow traffic. Since these phases are necessary, their impacts to overall travel times should be analyzed. The City will not permit any design concept which "provides a signal phase to allow arriving bus/train to proceed through unimpeded." Due to the complex operation of traffic signals, Bus/LRT phases serve only to assign right-of-way to these vehicles, and no provisions are made to ensure their passage is "unimpeded." All such references to this type of unimpeded operation in the EIR should be removed.

Response: The analysis of the impacts of the proposed project was conducted based on the assumption that the BRT project would receive "priority," not "preemption." This meant that the BRT or LRT operations were assumed to receive an "extended green" or an "early green" at signalized intersections where the signal cycle could accommodate the phase adjustments without disrupting cross street traffic flow. The buses will at times have to slow and/or stop at a cross street and were not assumed to pass through all intersection unimpeded.

CLA (1)-23 The coordination of traffic signals is based on the progression of traffic through the intersection, and not on the time it takes to board a bus. No assumptions should be made about signal timing relative to conditions which the operation of the signal does not influence. The use of queue jumpers is inappropriate for dedicated lane BRT operation. Complete details of the proposed "re-calibrated signal timing" need to be provided to DOT for review at each and every impacted intersection. If any intersection requires a change in cycle length, then every intersection adjacent to it operating on the same cycle must be analyzed for impacts. This will likely include all signals on Wilshire Boulevard. The change of cycle length has significant impacts on area-wide operations and cannot be made at individual locations without analysis of impacts to coordination and progression at adjacent intersections.

Response: Since the time of the writing of the Draft EIS/EIR, LADOT has refined the traffic signal priority for the Metro Rapid system in association with MTA. The current Wilshire BRT LPA does not envision changes to this system with the introduction of new buses and stations in the corridor for the purposes of bus signal priority.

CLA (1)-28 Parking or stopping restrictions need to be shown on the drawings.

Response: These are shown in the Engineering drawings contained in Volume II of the Final EIR.

CLA (1)-29 *Impacts on the City of Los Angeles Community Plans, described in the City's comments on the Notice of Preparation, need to be addressed. The Transportation Element of the City's General Plan should be used to obtain accurate and appropriate information regarding applicable plans and policies. Note also that the eastern portion of Exposition Corridor traverses the South Central and West Adams/Baldwin Hills/Leimart community plan areas.*

Response: As noted on Page 3.5-13 of the Draft EIR, applicable community plans address policies for communities along the transit corridors. These goals support public transit and use of the transit corridors to improve levels of service between Downtown Los Angeles and Santa Monica. The City of Los Angeles General Plan Framework and its Community Plans recognize Wilshire Boulevard as the primary east-west transportation corridor crossing the basin south of the Santa Monica Mountains. Wilshire Boulevard is designated as a transit priority highway and its corridor contains multiple existing and planned destinations that warrant multiple points of transit access. Therefore, development of transit within the Wilshire Boulevard ROW is consistent with the City of Los Angeles' General Plan and Community Plans (refer to Draft EIR, Page 3.5-15). The Wilshire BRT is also consistent with the LA Congestion Management Plan, which requires coordination of land use and transportation capacity and policy. As noted, the Draft EIR has provided a thorough analysis of the proposed project's consistency with various community plans and the larger framework of the City of Los Angeles General Plan. The Exposition Corridor portion of the project has been removed from the project description.

CLA (1)-30 *The current text, in particular the paragraph on Page 3.5-15 regarding the Exposition Corridor, does not reflect adopted City policy as contained in the Transportation Element. The conclusion that "although development of a transit system along the Exposition ROW is generally consistent with the City's policies, it is not viewed as favorable" is not a statement supported by facts. This section should also note that segments of Wilshire Boulevard (between the City of Beverly Hills and Malcolm Avenue and between Fairfax Avenue and Sycamore Avenue) and Venice Boulevard (between Longwood Avenue and Abbot Kinney Boulevard) are designated Scenic Highways in the City's General Plan.*

Response: Portions of this comment pertain to the Exposition LRT and are not, therefore, addressed here. Further, these issues are appropriately addressed in the Visual Quality section of the Final EIR (refer to Section 3.5). It is specifically noted that portions of Wilshire Boulevard are designated as a scenic highway by the City of Los Angeles.

CLA (1)-34 *Temporary construction and permanent impacts will include air quality, noise access, existing linkages with activity areas, facilities and existing user patterns, parking, and traffic and circulation. Mitigation measures should include measures to minimize construction dust, noise, traffic, including haul routes and construction times and routes, signage, replacement parking acquisition, alternative access, traffic and circulation patterns, park patron program, operations and facility compensation, and facilitating improved linkages with existing users and user groups. Use of buffering, landscaping, setbacks, and other design features to improve access to park facilities and mitigate impacts should be reviewed with Department of Recreation and Parks staff.*

Response: Please refer to the Mitigation Monitoring Plan and the Construction Mitigation Plan contained as Appendix D to the FEIR Mitigation measures are intended to minimize construction dust, noise, and traffic; including specifying haul routes and construction times and routes; provide signage and replacement parking; provide alternate access, traffic, and circulation patterns; provide a park patron program and operations and facility compensation; and facilitate improved linkages with existing users and user groups through the use of buffering, landscaping, setbacks, and other design features as they pertain to the Wilshire BRT project. The proposed project, which will be implemented on a peak period basis only, would not be expected to have any permanent impacts on City parks that would require the types of mitigation measures discussed.

CLA (1)-36 Costs associated with the development and deployment of new traffic signal software to provide the necessary priority control are not included. Costs for the installation/modification of traffic signal equipment are substantial and should be shown.

Response: The cost of the ATCS signal improvements is a required mitigation measure for the project. It was estimated as $6,495,000 (Mitigation Measure 3.2-1) based on information provided by LADOT, in terms of the number of signals and the cost per signal. This cost is included in the project budget.

CLA (1)-43 MTA should also consider providing Metro Rapid Bus service which further minimize stops along Wilshire Boulevard. This would improve the performance of buses on Wilshire Boulevard without detrimentally impacting mixed-flow traffic and businesses.

Response: As the Metro Rapid Bus System expands, alternative operating plans will be evaluated that may include skip=stop or super=express service. At the current time, however, one-mile spacing of stations is the standard which balances speed of operation with the frequency of stops.

The alternative under consideration along Wilshire Boulevard is the curb-lane, peak-hour bus only BRT system, which would help minimize impacts to mixed-flow traffic compared to the other alternatives considered. It is critical that bus operating speeds increase in the face of continued, increased congestion in Los Angeles. The proposed project accomplishes this objective at least during peak-hours.

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

Response: At the time of preparation and circulation of the Draft EIR, Census 2000 data for California had not yet become available. NEPA does not contain a standard rule that states when to define baseline conditions. It is permissible to use the date of issuance of the Notice of Intent (NOI) as the date to define the affected environment, in this case May 2000. Furthermore, Section 15125 of the CEQA Guidelines provides that an EIR must include a description of the physical environmental conditions in the vicinity of the project, as they exist at the time the Notice of Preparation (NOP) is published. As required by CEQA and permitted by NEPA, the environmental impact analyses in the Draft EIR were predicated on the date the NOP was published, which in this instance was May 2000. Therefore, the lead agency is not required to include 2000 Census data in the environmental documentation for the proposed project.

CLA (1)-48 [The following alternative projects should be analyzed:] Peak hour only bus lanes in the curb lanes of Wilshire with TSM enhancements. This alternative will require analysis of impacts from removal or restrictions on parking, right turns, removal of loading zones and limitations on driveway access.

Response: The City of Los Angeles suggests that a peak-hour only bus lane in the curb lanes of Wilshire with TSM enhancements be analyzed as an alternative. The preferred alternative being considered is now a peak-hour bus only BRT system along Wilshire Boulevard. Impacts associated with this alternative are discussed in the Final EIR.

CLA (1)-49 [The following alternative projects should be analyzed:] Bus lanes on streets parallel to Wilshire Boulevard, with no bus lanes on Wilshire Boulevard. (DOT)

Response: The City of Los Angeles suggests that bus lanes on streets parallel to Wilshire Boulevard be analyzed, with no bus lanes on Wilshire Boulevard. The MIS process that preceded this environmental study examined a broad range of alternatives. This process screened out alternatives that were determined to not be feasible or that contained other significant flaws that precluded further analysis. The MIS process recommended a series of alternatives for further analysis and these alternatives were carried forward into the environmental review

phase. The environmental document discusses the history of this process in Section 2.0. The MTA is evaluating additional Metro Rapid bus lines and has adopted a system of 22 lines for implementation. Bus routes parallel to Wilshire Boulevard that have been approved for implementation as Metro Rapid lines include Santa Monica Boulevard and Pico Boulevard. The potential use of dedicated or peak-period transit lanes would be considered separately as a part of those projects.

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

Response: All ridership data is output from the MTA travel demand forecasting model. This model inputs census data, land use data, highway networks, speeds, and transit systems to calculate future travel demand. All model components are calibrated and validated against current, existing data to insure accuracy when forecasting future year data. Travel demand models such as MTA's have proven over the years to provide the best quantitative measure of travel patterns, including transit ridership, in the future. As the industry-accepted standard, it is the best tool we have for estimating project boardings and justifying ridership projections. The Metro Rapid Bus Service along Wilshire Boulevard has enjoyed a 20 percent ridership increase in the last year. As congestion increases, MTA expects ridership to continue to grow, particularly when peak-hour service is capable of faster speeds than auto travel. Updated ridership forecasts are contained in Section 2.7 of the FEIR.

CLA (1)-51 *Page 2-6 and 2-12. Figure 2-2 (The Metro Rapid Plan) and Figure 2-5 (BRT Typical Station Exposition or Wilshire): There is no proposal for pedestrian lighting systems for station stops. Refer to standards and guidelines in Chapter VI-C of the Transportation Element. (BSL)*

Response: The City of Los Angeles comments that there is no proposal for pedestrian lighting systems for station stops. Figure 2-10 and Figure 2-12 indicate illumination will be provided at station stops, and all lighting systems will meet LAMTA standards and guidelines. Mitigation Measure 3.7-2 provides that all stations areas shall be lighted.

CLA (1)-57 *Page 2-21, Subsection 2.2.5 (Alternative 1B: Wilshire BRT (Curb Adjacent Design Option)): Right turning traffic will severely impact bus operations in this configuration. Pedestrians crossing will force buses to stop behind right turning vehicles. Bus travel times would actually increase from today's Rapid Bus operation due to the right lane restrictions. Also, all express buses will be delayed by local buses stopped in the right lane. The use of raised pavement markers greater than ¾" high is unacceptable and shall not be suggested or recommended. (DOT)*

Response: Mitigation Measure 3.7-1 has been included to provide for enhanced pedestrian signage at crosswalks. The commenter notes that right turning vehicles and pedestrians may slow buses in the curb lane. As part of the proposed project, a demonstration project will be conducted to assess these impacts. The BRT buses will not be restricted from using other lanes than the curb lane, so they will be able to pass a stopped local bus if necessary. There is no indication that the BRT with a peak period dedicated lane would have a slower travel time than the current Metro Rapid Bus.

CLA (1)-58 *Page 2-23. Table 2-5 (Wilshire BRT Operating Characteristics): Only signal "priority" will be given for BRT operation, not "preemption". Remove all references to "preemption" for BRT. Also, converse to what is stated, major intersections often receive less priority than minor intersections, due to their higher cross traffic volumes and potential impacts. Also, average speed figures appear to be too high for curb-adjacent operation, due to the very large number of potential right turn locations along the BRT segment. These figures should be revised to reflect more realistic operating speeds. (DOT)*

Response: Please refer to Response to Comment CLA (1)-22 for a discussion of left- and right-turn phases. As stated in the Draft EIR, the operating speeds are expected to be reasonable, given the existing speeds of Metro

Rapid Buses and the additional benefits of the dedicated curb lane, even when shared with right-turning vehicles. Also, please refer to Response to Comment CLA (1)-57 for a discussion of right-turning traffic.

CLA (1)-80 *Page 3.2-7. Subsection 3.2.2 (Affected Environment): "Major North-South Arterials (Listed from West to East)"—The following streets should be added to the list: Centinela Ave., Sawtelle Bl., Fairfax Ave., Highland Ave., Wilton Ave./Arlington Ave., Western Ave., Normandie Ave., and Hoover St. (DOT)*

Response: All of the streets listed in this comment were included in the Draft EIR/EIS on Pages 3.2-7 and 3.2-8.

CLA (1)-81 *Page 3.2-8. Subsection 3.2.2 (Affected Environment): "Intersection Levels of Service"—Existing DOT data does not support the LOS conditions presented here. Please provide DOT with the data (Appendix) used to determine the existing level of service conditions for this report. (DOT)*

Response: The traffic data technical appendix to the Draft EIR was provided to LADOT for review. It contains existing traffic volume data and level of service calculations.

CLA (1)-82 *Page 3.2-13, Table 3.2-1 (Existing 2000 Conditions Study Area Intersections Operating At LOS E/F): According to this table, only 28 intersections (18% of the 158 studied) operate at LOS E or F during the morning and/or afternoon peak periods. Based on field reviews and other traffic impact analyses, the intersections of Wilshire/Westwood Boulevards and Wilshire/Beverly Glen Boulevards (a CMP monitoring station) traditionally operate at LOS E and F. Wilshire Boulevard through the Westwood area is one of the most congested corridors in the City of Los Angeles. At the very least, these two intersections should be added to the list of 28 intersections. (DOT)*

Response: The level of service calculations for the intersections of Wilshire Boulevard/Westwood Boulevard and Wilshire Boulevard/Beverly Glen Boulevard were provided to LADOT and were reviewed during the preparation of the traffic conditions study. It should be noted that the Wilshire/Westwood intersection is acknowledged to have a significant adverse impact if peak-period lanes are implemented in that area. No peak-period lanes are proposed at Beverly Glen, and therefore, no impacts are anticipated that that location.

CLA (1)-87 *As previously stated in our responses to the Notice of Preparation and Administrative Draft EIR, the Department of Transportation has explicit criteria for significant impact which include a 1% change threshold for projected-related increases at intersections currently operating at LOS E or F. The DEIS/DEIR uses a 2% change threshold for all such intersections, adapted to a 5.0 second delay under 1997 Highway Capacity Manual (HCM) methodology. New calculations will need to be made for all intersections currently operating at LOS E or F in the City of Los Angeles, utilizing the City's criteria for significant transportation impact (attached). (DOT)*

Response: Please refer to Response to Comment CLA (1)-15 for a discussion of criteria for the assessment of significant impacts.

CLA (1)-88 *Pages 3.2-21 through 3.2-25. Subsection 3.2.3 (Impact Assessment): Under "Growth in Travel and Its Impacts" and in Table 3.2-4, define "regional" and identify the five counties in the Five County Southern California MTA Modeling Area. Modify Table 3.2-4 to clearly separate sections ("Home-Work," "Corridor Internal-Internal Trips," etc.) (DOT)*

Response: The five-county modeling area includes Los Angeles, Orange, Ventura, and most of San Bernardino and Riverside Counties—effectively, the South Coast Air basin.

CLA (1)-89 *Page 3.2-28, Table 3.2-5 (Projected Growth in Peak Hour Traffic Combined Freeways and Arterials): According to this table, peak hour traffic along the Sepulveda Boulevard screenline is projected to increase by less than 10% from 1998 to 2020 in the morning and afternoon peak hours. However, with approved development projects in the Westside, including Playa Vista Phase I, expansion of Loyola Marymount University and Hughes Entertainment Center, and the proposed LAX expansion project, traffic on Sepulveda Boulevard and intersecting streets*

(Manchester, Centinela, Jefferson, Culver and Washington) is expected to increase at a rate much higher than 10% by 2020. This is especially true along the Sepulveda Boulevard screenline south of Venice Boulevard. (DOT)

Response: The MTA Travel Demand Forecasting Model includes socioeconomic data inputs that are consistent with SCAG forecasts for 2020. These forecasts have been reviewed by all local jurisdictions in the SCAG region and reflect the level of development anticipated by the local jurisdictions, including the development projects noted in this comment. As noted on page 3.2-28 of the Draft EIR, growth in traffic volumes in the north-south direction across three screenlines varies from 14% to 23%, with individual facilities included in those screenlines exhibiting even more variation. Sepulveda Boulevard can only absorb a limited amount of additional traffic because it is near capacity now. Similar capacity-reaching effects occur on the Santa Monica Freeway as noted on page 3.2-28. As the region approaches complete gridlock, transit improvements, BRT, diamond lands, and using abandoned Pacific Electric rights of way will be critically important to maintaining local and regional mobility.

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

Response: The text on page 3.2-33 lists the scenarios that were modeled with the MTA travel demand forecasting model. Alternatives 1A and 1B were not modeled with that tool. The analysis of these alternatives was manually derived from the Alternative 1 model runs.

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

Response: The text on page 3.2-34 indicates that "Table 3.2-10 provides a summary of Countywide transit performance measures" and notes that the performance measures were derived from the MTA travel demand model. The discussion on Impacts on Highway Performance Measures references Table 3.2-11, which also provides data derived from the MTA travel demand model. The 8,500 vehicle trip reduction is the difference between the 25,342,446 Daily Vehicle Trips for the No Action Alternative versus the 25,333, 963 Daily Vehicle Trips under Alternative 1 (the actual difference is 8,483).

CLA (1)-92 *Page 3.2-36. Table 3.2-10 (Comparison of Transit Performance Measures): The "Daily Segment Boardings" figures for all build alternatives are not supported. How is a 1.01% increase in Daily Transit Trips assumed based on the Wilshire BRT Alternative?*

Response: The data presented in Table 3.2-10 are derived directly from the MTA travel demand model which has been validated and subjected to peer review. The 1.01% increase in Daily Transit Trips is not assumed for the Wilshire BRT. It is a model produced result, reflecting the enhanced transit operating plan associated with the BRT and its attractiveness to riders.

CLA (1)-93 *Why would Wilshire BRT attract any more riders than existing Metro Rapid Bus?*

Response: The Wilshire BRT was forecast to attract more riders than the existing Metro Rapid Bus due to the improved operating conditions for the buses in dedicated lanes compared to the Metro Rapid Bus operating in mixed flow. BRT with dedicated transit lanes will allow relatively higher speeds for transit in peak-hours—an

important consideration given the speed forecast decreases (-23%) for mixed flow operations. This is shown in Table 3.2-9.

CLA (1)-94 The performance measures shown in this table are not substantiated by the proposed design. Table 3.2-10—The percent increase in Daily Transit Trips ("Compared to No Action") for Alts. 1, 2 and 2A got shifted to the right. The correct percentages should be 1.6, 1.52 and 2.23 respectively. (DOT)

Response: The first part of this comment pertains to the previous comment (CLA (1)-93); please refer to response CLA (1)-93 above. The remainder of the comment pertains to a typographical error in Table 3.2-10. The comment is noted.

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

Response: Although this comment pertains to text included under Alternative 1, an alternative no longer being considered as part of the proposed project, the impact noted is also present in Alternative 3A, which relates to the proposed project. Therefore, in the interests of clarity, the section will be revised to clarify the drop in traffic volumes on the San Diego Freeway and the increase in volumes on the Santa Monica Freeway.

CLA (1)-96 Page 3.2.-43, 44, and 45. Subsection 3.2.3 (Impact Assessment): "Impacts on Focused Corridors"—DOT does not agree with assumption that a significant portion of the traffic that is diverted away from Wilshire Bl., by the reduction of one travel lane in each direction, will convert to transit ridership. Furthermore, DOT also does not agree with the redistribution of traffic as shown in figure 3.2-11. Please provide DOT with the modeling assumptions, data and methodology, so that a thorough review of the modeling projections can be conducted. (DOT)

Response: Please refer to Responses to Comments CLA (1)-8 and CLA (1)-3 for a discussion of MTA's Traffic Demand Forecasting Model. The LADOT has been briefed on the assumptions included in the MTA Model by MTA modeling staff and their consultants. Page 3.2-45 notes that loss of a lane on Wilshire does divert traffic to other east-west streets. It should also be noted that these impacts were assessed as compared to the No Project Alternative.

CLA (1)-98 The impact of eliminating lanes on Wilshire discussed on Page 3.2-45 does not analyze the impact of left turn prohibitions. (DOT)

Response: The impact of left-turn prohibitions was included in the level of service analysis by redirecting the prohibited turns to alternate locations. The proposed project no longer, however, includes median running operations or left turn prohibitions, so this comment is no longer applicable.

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

Response: The commenter supports implementation of peak-hour lanes only, which is consistent with the project as now proposed. With respect to short term parking loss, refer to Topical Response A.

CLA (1)-105 *Page 3.2-57. Subsection 3.2.3 (Impact Assessment): In the fourth paragraph, the use of exclusive curb lane operation for buses will have the effect of slower bus operation. It is very likely that this type of operation will be even slower than today's Metro Rapid Bus operation...possibly reducing or eliminating all of the benefits of signal priority. The analysis of this type of BRT configuration must consider the impacts of delays due to right turning traffic blocking the bus lane. (DOT)*

Response: The impact of the right turning vehicles using the curb adjacent bus lane was included in the intersection level of service analysis by reflecting the curb lane as a right-turn-only lane. The overall effects of the delay on bus operations due to these right-turning vehicles was reflected in the travel time variation for alternative 1B (60 minutes) compared to Alternative 1A (58 minutes) as noted on Page 5-12 of the Draft EIR. This increased run time was factored into the travel demand forecasts and other statistics. Also, buses will have the ability to depart the right lane in order to pass right-turners, which is a maneuver common to current Metro Rapid Bus operations on Wilshire Blvd.

CLA (1)-108 *Page 3.2-65. Subsection 3.2.3 (Impact Assessment): In the last paragraph, the use of "visual recognition technologies" has not been tested or deployed for any existing Bus or LRT system. The accuracy of these devices is unknown at this time. DOT will only support the use of loop detector to implement transit priority, similar to Metro Rapid Bus and Metro Blue Line. (DOT)*

Response: The type of technology to be used in vehicle detection will be finalized in the final design phase of the project. LADOT's preference for the use of loop detectors will be made known to the final designers.

CLA (1)-110 *This section also indicates that, with the proposed Wilshire BRT, only 21% of the 78 signalized intersections studied along Wilshire Boulevard will operate at LOS E or F by 2020. As stated earlier, Wilshire Boulevard is one of the most congested streets in the City with over 70,000 Average Daily Trips along some segments. Removing a third of roadway capacity for motorists, as proposed in the Wilshire BRT alternative, would result in a greater number of intersections operating at LOS E or F in the future, even with the assumed increase in transit mode split. (DOT)*

Response: The level of service calculations reflect the loss of a travel lane on Wilshire Boulevard and the increased mode split to transit attributable to the enhanced transit service, as well as a significant diversion of traffic away from the Wilshire corridor. This diversion was significant enough to impact parallel streets, thereby requiring mitigation, but also significant enough to allow Wilshire Boulevard to continue to operate at levels of service comparable to current conditions, even with the reduced number of through lanes. Some of this roadway capacity is now used for parking cars and that loss of parking is mitigated.

CLA (1)-112 *Pages 3.2-71. Table 3.2-17 (LOS E/F Intersections in 2020—No Action Alternative): This and subsequent LOS tables indicate where the intersection LOS is E or F and if there is an impact, but they should also contain volume over capacity (V/C) ratios and delay time information for a complete picture of how the intersections will operate under given conditions. (DOT)*

Response: The detailed level of service calculation worksheets with volume/capacity and delay values at all intersections have been provided to LADOT for review and are available to any other interested parties. It was determined that this level of data for all 158 intersections studied would be unnecessary to include in a public document. Identifying the locations that were at LOS E or F and which would be impacted by the project alternatives was felt to be an adequately detailed to disclosure of potential impacts. Table 3.2-17 clarifies the operation of the No Action Alternative (i.e., existing conditions).

CLA (1)-113 *Page 3.2-84, 88. Subsection 3.2.4 (Impact Assessment): As noted, discussions were held with DOT to identify the likely traffic signal operational characteristics and scenarios for the implementation of the Wilshire BRT and Exposition BRT systems. However, our concerns and comments are not addressed in the DEIS/DEIR. (DOT)*

Response: While the commenter does not state what those concerns might be, it is presumed that they are reflected in the other specific comments submitted on the Draft EIR by LADOT.

CLA (1)-114 *Page 3.2-97. Table 3.2-36 (Comparison of Overall Intersection Delay (Seconds/Vehicle) Wilshire BRT Alternative): A 1- or 2-second increase in delay after removing one out of three lanes (33%) and implementing protected-only left turn phasing demonstrates a flawed analysis. The procedure used was improperly applied. The analysis technique used does not adequately reflect the Alternative's impacts, and further analysis must be made. See discussion above under "Key City Concerns—Traffic and Circulation." (DOT)*

Response: Please refer to Response to Comment CLA (1)-110 for a detailed discussion of level of service calculations and increased mode split to transit attributable to enhanced transit service and diversion of traffic away from the Wilshire corridor. The levels of delay are also noted (on page 3.2-98) to result from equally congested intersections, again reflecting the extreme gridlock conditions faced by the region. In fact, the region is actually nearing absolute roadway capacity.

CLA (1)-115 *Page 3.2-99. Subsection 3.2.4 (Mitigation Measures): In the first bullet, no design should be considered which "provides a signal phase to allow arriving bus/train to proceed through unimpeded." Due to the complex operation of traffic signals, Bus/LRT phases serve only to assign right-of-way to these vehicle, and no provisions are made to ensure their passage is 'unimpeded.' Remove all such references to this type of operation. (DOT)*

Response: Please refer to Response to Comment CLA (1)-22 for a detailed discussion of priority of signalization.

CLA (1)-116 *Page 3.2-99. Subsection 3.2.4 (Mitigation Measures): In the second bullet, the coordination of signal lights is based on the progression of traffic through the intersection and not on the time it takes to board a bus. No assumptions should be made about signal timing relative to conditions which the operation of the signal does not influence. (DOT)*

Response: The bullets referenced are "considerations that will go into the detailed signal design effort" which will occur during final design. The second bullet is not intended to suggest that signal timing would be made relative to conditions which the signal does not influence, but rather such elements as a far side bus stop, so that the signal timing would allow a bus to pass through the intersection on an extended green to reach its stop. That would be as opposed to a near side stop where the bus is caught behind right turners and the signal phase.

CLA (1)-117 *Page 3.2-99. Subsection 3.2.4 (Mitigation Measures): In the third bullet, the use of queue jumpers is inappropriate for dedicated lane BRT operation. Remove this recommendation. (DOT)*

Response: The referenced bullet is not a recommendation, rather a "consideration." It does not appear at this time that the proposed peak period curb adjacent lane will result in the use of queue jumpers, but these should not be deleted from the range of options considered in final project design.

CLA (1)-118 *Page 3.2-99. Subsection 3.2.4 (Mitigation Measures): Under the discussion of "General Mitigation Measures," add changeable message signs to direct vehicular traffic to other routes if congestion on Wilshire and Exposition is severe. Experience has shown that the potential for accidents between buses/light rail and other vehicles along these routes will increase, and accident incidents would severely impact already reduced capacity on these streets. (DOT)*

Response: It is not anticipated that changeable message signs will be needed along Wilshire Boulevard to direct traffic to alternate routes. With the proposed project being implemented during peak periods only, the primary drivers affected will be regular commuters traveling to/from work. They will quickly figure out how to adjust their commute routes to respond to the daily occurrence of the peak period BRT. Changeable message signs are more useful to direct drivers to alternate routes during an unusual event or non-recurring congestion.

CLA (1)-119 *Page 3.2-99. Subsection 3.2.4 (Mitigation Measures): To mitigate the impact of spillover traffic onto parallel routes along Wilshire and Exposition, consider making improvements to these parallel streets, such as a reversible lane operation similar to 4th Street between Alameda Street and the Santa Ana Freeway. (DOT)*

Response: The mitigation measure that was identified to mitigate the impacts of spillover traffic onto parallel streets was the funding and implementation of the ATCS system. Since the project will be implemented in both directions during the peak-hours only, it does not appear that a reversible lane would be an appropriate mitigation measure for this project.

CLA (1)-125 *Page 3.2-100. Subsection 3.2.4 (Mitigations Measures): Under the discussion "Specific Intersection Improvements," the beneficial effect of proposed mitigation measures at impacted intersections should be quantified with Levels of Service, volume/capacity ratios and delay measurements. (DOT)*

Response: The beneficial effects of proposed mitigation measures were quantified with level of service calculations contained in a separate Technical Appendix, which has been provided to LADOT.

CLA (1)-126 *Page 3.2-101. Subsection 3.2.4 (Mitigation Measures): Throughout various bullets, complete details of the proposed "re-calibrated signal timing" need to be provided to DOT for review at each and every impacted intersection. If any intersection requires a change in cycle length, then every intersection adjacent to it operating on the same cycle shall be analyzed for impacts. This will likely include all signals on Wilshire Blvd. The change of cycle length has significant impacts on area-wide operations, and cannot be made at individual locations without analysis of impacts to coordination and progression at adjacent intersections. (DOT)*

Response: The details of the proposed recalibrated signal timing are shown on the level of service calculations contained in the Technical Appendix, which has been provided to LADOT under separate cover. The Highway Capacity Manual Operations Analysis Methodology used in this study requires specification of the signal timing and phasing for each intersection. These data are listed on the calculation sheets. It is understood that changes in signal cycle lengths must be conducted in coordination with adjacent signals. The details of the signal timing and any changes in signal timing on adjacent streets will be developed during the preliminary engineering and Final Design phases of the project, in consultation with LADOT.

CLA (1)-127 *Impacts on the City of Los Angeles Community Plans, described in the City's comment letter dated June 22, 2000 (attached) on the Notice of Preparation, need to be addressed. (DOT)*

Response: Refer to Response to Comment CLA (1)-29 for a detailed response concerning the consistency of the proposed project with applicable community plans and policies.

CLA (1)-129 *Page 3.5-19 to 3.5-23. Subsection 3.5.3 (Impact Assessment and Mitigation Measures): While the analysis of the proposed project's consistency with local planning goals and policies on Page 3.5-19 is appropriate, transit policy consistency alone does not reduce the significance of the project's impacts, including when those impacts are inconsistent with other local planning policies. In the first full paragraph on Page 3.5-23, the EIR says that "the Cities of Los Angeles, Beverly Hills, and Santa Monica, in general, all plan for high-density mixed uses within station areas to allow for maximum use of the transit system. Therefore, implementation of the Wilshire BRT Alternative would result in less than significant impacts on neighborhood character and quality of life for adjacent neighborhoods." This finding is unwarranted given the discussion of impacts preceding the statement. The potential conflict of Alternative 1, 2 and 3 with the General Plan's prohibition against removal or reduction of landscaped medians along designated Scenic Highways except under limited circumstances (left turn channelization within 100 feet of a signalized intersection or accommodation of a Class II bikeway) needs to be fully described and discussed. While the project's consistency with local transit planning policy may support a finding of overriding considerations by the decision-making body, it does not supplant the EIR's responsibility to identify the significant unavoidable impacts on the surrounding neighborhood and the General Plan. The paragraph should be revised accordingly. (DOT, DCP)*

Response: The alternative under consideration is the curb-lane, peak-hour only BRT system along Wilshire Boulevard, which does not require the removal and reconstruction of landscaped medians. With regard to land use impacts (i.e., impacts on neighborhood character and quality of life for adjacent neighborhoods), please refer to Response to Comment CLA (1)-29 for a detailed response concerning consistency of the proposed project with applicable community plans and policies, particularly with regard to land uses in the Wilshire Corridor. Since the median running BRT operation has been eliminated, the medians within the Scenic Highway will not be affected by the project.

CLA (1)-133 *Page 3.17-2. Subsection 3.17.2 (Affected Environment): The historical/ornamental electroliers along the Wilshire corridor should be described and their historical significance documented. It should be noted under Subsection 3.17.3 (Impact Assessment and Mitigation Measures) that these electroliers must be retained and improved (refurbished and upgraded) as part of any project along Wilshire Boulevard. (BSL)*

Response: Mitigation of impacts to historical/ornamental electroliers are contained in the FEIR the Construction Mitigation Plan in an Appendix to the FEIR.

CLA (1)-134 *Page 3.18-5. Subsection 3.18.1 (Construction Methods): Under "Utility Relocation and Street Closures," in the first paragraph, last sentence, include "Lighting" under special facilities. In the second paragraph, note that the City of Los Angeles will require standard lighting levels for detour and existing roadways through and around construction zones. (BSL)*

Response: All construction documents will conform to all applicable City and County codes and regulations.

CLA (1)-135 *Page 3.18-6. Subsection 3.18.1 9 (Construction Methods): Under "At-Grade Guideway," the use of "six-inch concrete curb or four-inch Bots Dots" to separate BRT lanes is unacceptable and shall not be suggested or recommended. Only white thermoplastic stripping shall be used to separate and designate lanes of traffic. (DOT)*

Response: White thermoplastic striping will be specified.

CLA (1)-136 *Page 3.18-6. Subsection 3.18.1 (Construction Methods): Under "Parking Facilities," the statement in this paragraph about the replacement parking lot at Crenshaw and Wilshire is inconsistent with the Environmental Analysis for Parking on Page 3.3-6, 2nd bullet, "Bronson to Citrus." The location of this facility is too far removed from the displaced on-street parking to be considered "replacement parking". (DOT)*

Response: The current project does not displace any parking spaces in this area and therefore no longer provides "replacement parking." Parking to be provided at the La Brea and Crenshaw parking facilities would be new parking for transit users, plus existing users of these facilities.

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

Response: The cost of the traffic signal system improvements and is included in the projects costs. Funding in the City of Los Angeles is provided for 433 intersections at a rate of $15,000 per intersection, if the peak period lanes are implemented. The new signal system will have broader benefits than simply mitigating for this peak-hour bus lane and the dollar amounts and relative funding amounts and sources are topics for further discussion between the City and MTA.

CLA (1)-142 *Parking or stopping restrictions are not shown on drawings.*

Response: These restrictions will occur during the A.M. and P.M. commute times, between 7:00 A.M. and 9:00 A.M. and 4:00 P.M. and 7:00 P.M. These are included in drawings in Volume II of the Final EIR

CLA (1)-143 *Some stations are shown on the near-side of intersections...justifications?*

Response: Every effort was made to locate stations on the far side of intersections. In some cases, this did not prove to be practicable.

CLA (1)-144 *What discourages pedestrians from jaywalking across the street from the platform/station? Is there a railing?*

Response: Stations are no longer proposed in the center median of Wilshire Boulevard. All stations are now located at the existing sidewalk, so no jaywalking would be encouraged by the project design.

CLA (1)-145 *Doors on left side of buses would eliminate many of the movements/tapers.*

Response: Left-hand doors were considered for a median BRT operation, but this type of BRT operation was rejected by the community and is no longer an option. Curb BRT operation will require right-handed doors.

CLA (1)-146 *Indicate City limits on plans.*

Response: The plans now show the city limits.

CLA (1)-147 *Information on driveways should be shown (especially major driveways).*

Response: This information would be indicated by the design-builder in the final construction documents.

CLA (1)-201 *1. A transportation impact on an intersection shall be deemed "significant" in accordance with the following table except as otherwise specified in a TSP, ICO or CMP:*

SIGNFICANT TRANSPORTATION IMPACT

Level of Service	*Final V/C Ratio*	*Project-Related Increase in V/C*
C	*> 0.700—0.800*	*equal to or greater than 0.0400*
D	*> 0.800—0.900*	*equal to or greater than 0.0200*
E, F	*> 0.900*	*equal to or greater than 0.0100*

For purposes of this calculation, the "Final V/C Ratio" shall mean the future V/C ratio at an intersection considering the impacts with project, ambient and related project growth but without proposed traffic mitigation.

"Project Related Increase in V/C" shall mean the change in V/C between the future V/C ratio with project, ambient and related project growth but without proposed traffic mitigation and the future V/C ratio with ambient and related project growth but without project and proposed traffic mitigation.

Response: The project is consistent with the CMP. Please refer to Response to Comment CLA (1)-15 for a discussion of criteria for the assessment of significant impacts.

CLA (1)-202 *2. A local residential street shall be deemed significantly impacted based on an increase in the projected average daily traffic (ADT) volumes:*

Projected Average Daily Traffic with Project (Final ADT)	*Project Related Increase in ADT*
0 to 999	*16 percent or more of final ADT*
1,000 or more	*12 percent or more of final ADT*
2,000 or more	*10 percent or more of final ADT*
3,000 or more	*8 percent or more of final ADT*

Response: The proposed project will only affect traffic during peak periods and will not prohibit any turning movements along Wilshire Boulevard, so it would not be expected to significantly affect average daily traffic (ADT) volumes on residential streets, as described in the ADT threshold of significance referenced. Also please refer to Topical Response B for a discussion of the loss of a travel lane.

Comment Letter 28: City of Los Angeles, June 2001

CLA (3)-2 *1. The Notice of Preparation does not indicate that the Exposition project would be auxiliary to the Wilshire project. The Exposition alternatives should be treated and analyzed as indent, stand-alone projects in the SEIS/SEIR.*

Response: The Exposition portion of the project is not "auxiliary" to the Wilshire project. The Notice of Preparation was filed at a time that the Wilshire and Exposition segments of the project were analyzed and treated as one project for purposes of the Draft EIR, with several alternatives and combinations of alternatives. Since circulation of the Draft EIR, the Wilshire BRT project has been adopted as the Locally Preferred Alternative by the MTA Board (June 2001) and is now described as a separate project from the Exposition project. Please refer to the Executive Summary of this Final EIR for a complete project description. This Final EIR document addresses the comments that pertain to the Wilshire BRT segment of the project only. Comments pertaining to the Exposition segment will be answered in a separate future environmental document.

CLA (3)-4 *3. It is our understanding that the Wilshire and Exposition projects are intended to be at-grade, with the possibility of as many as seven aerial grade separations for the Exposition alignment if impacts cannot be otherwise mitigated. Any deviations from at-grade (tunneling, trenching, bridging or other grade separations) which are anticipated as possible project options should be clearly described and preferably illustrated.*

Response: The City of Los Angeles comments that any grade separations that are anticipated as possible project options should be clearly described and preferably illustrated.

The Wilshire project consists of restriping and repaving the outside curb lane of Wilshire Boulevard to ensure that a flat driving surface is created. No tunneling, trenching, bridging, or other grade separations are anticipated for the proposed project.

CLA (3)-7 *1. Study intersections-We have received the preliminary study intersection list from your traffic consultant, Meyer Mohaddes Associates. The consultant should contact LADOT to schedule a separate scoping meeting to finalize the study intersection list prior to conducting the traffic count surveys.*

Response: These meeting were held with LADOT to finalize the list of intersections studied, prior to conducting traffic courts.

CLA (3)-8 *2. Traffic count data-It is our understanding that new manual traffic counts will be conducted for the study intersections during summer months. Typically, summer count volumes are low due to area schools being out of session and workers on vacation. For this reason, the counts should be adjusted appropriately upwards to reflect average conditions. Please conduct the manual traffic count surveys in accordance with LADOT standards.*

Response: As noted on Page 3.2-13 of the Draft EIR/EIS, "The summertime counts were increased by an average of 3 percent to reflect typical fall conditions."

CLA (3)-9 *3. Traffic modeling assumptions-Prior to conducting the traffic impact analysis, the underlying modeling assumptions which were used to develop transit ridership forecasts, including mode split assumptions, trip length and vehicular trip reduction assumptions due to increased transit ridership, need to be submitted for LADOT review. Modeling results should be accompanied by an explanation in the main text of methodology, assumptions and levels or thresholds of significance. If growth forecasts are taken from the adopted 1998 Regional Transportation Plan (RTP),*

they should be modified to reflect most currently-available forecasts being developed for the MTA Long Range Plan and 2001 RTP update, with a 2025 time horizon. The SEIR/SEIS baseline should also include Phase I Rapid Bus deployment on Wilshire with corresponding signal priority.

Response: Please refer to Response to Comment CLA (1)-3 for a discussion of MTA's Traffic Demand Forecasting Model. The existing Rapid Bus deployment is reflected in the baseline conditions.

CLA (3)-10 *4. Traffic impact analysis methodology-Because the proposed project could lead to significant operational impacts at critical intersections and because the planning methodology for the Level of Service analysis (Critical Movement Analysis) may not sufficiently quantify those operational impacts, we recommend using the Highway Capacity Manual's delay methodology, similar to that used for the Santa Monica Boulevard Transit Parkway project. The department of Transportation has explicit criteria for significant impact (see attachment) using volume/capacity ratios. These criteria should be adapted to the "delay" measure after consultation with LADOT.*

Response: The analysis was conducted as recommended in this comment.

CLA (3)-11 *5. Signalization at intersections-The SEIS/SEIR should address the question of whether signalization can be warranted at all crossings of public streets and rail rights-of-way, or at the intersections of arterials and other streets. What would be the consequences on project operation if warrants cannot be met?*

Response: The proposed project will not add any additional traffic signals along Wilshire Boulevard.

CLA (3)-12 *6. Signal priority/timing-The SEIS/SEIR should explain how signals would be timed—on a cycle or triggered by transit vehicles—and disclose all impacts of priority signal timing on cross traffic flows. Also, the traffic impacts of full-signal pre-emption for light rail transit should be analyzed after consultation with LADOT's Transit Priority Plan staff.*

Response: The current Wilshire BRT project is proposed to utilize the signal priority system that has already been developed for the Metro Rapid Bus System and is currently in use. No new signal system is proposed for the Wilshire BRT project.

CLA (3)-13 *7. Traffic flow-Impacts from reducing the number of mixed flow lanes, removing or restricting left turns, and reducing lane widths should be examined with respect to street carrying capacity, congestion and delay at intersections, spillover traffic onto adjacent streets and additional right turn movements and traffic circulation where left turns are prohibited. The SEIS/SEIR should also evaluate the impacts of buses on mixed traffic flow in segments without bus lanes. For light rail transit, crossing gate plans and timing should be described and analyzed for impacts on cross traffic flows.*

Response: All of the issues raised in this comment are addressed in Section 3.2 of the Draft EIR. The impact of buses in mixed flow is the same as today's Metro Rapid Bus

CLA (3)-14 *8. Traffic Safety-Proposals to reduce lane widths should be analyzed for potential impacts on traffic safety, and all re-designed lane widths should meet minimum City standards. The SEIS/SEIR should also analyze potential safety impacts of proposed bus cross-over movements in intersections and "meandering" lane striping to accommodate new and existing medians. Transition points between dedicated bus lanes and mixed flow lanes should be examined for potential safety and circulation problems. Integration with and impact on existing and planned bike lanes should be analyzed. Safety issues pertaining to crossing gates (for both vehicles and pedestrians) should be discussed.*

Response: The proposed project will not significantly affect lane widths on Wilshire Boulevard, nor will it include crossovers at intersections or meandering lane striping, since it will be implemented in the curb lane during peak periods only. The transition points in the Westwood area and at the Santa Monica City limits are being evaluated in detail during the Preliminary Engineering phase of the project, in close coordination with LADOT. No operational or safety problems are anticipated. The proposed project will not affect bike lanes, since it will

only be implemented during peak periods in the existing curb lane, and there are no existing bike lanes along Wilshire Boulevard.

CLA (3)-15 9. Left turns-With LRT or bus lanes, left turns at intersections pose a serious hazard as demonstrated by the operation of the LA-Long Beach Blue Line. The SEIS/SEIR should evaluate accident risks and possible safety measures where left turns are proposed to be permitted along the Wilshire and Exposition alignments.

Response: The proposed project will not affect left turns along Wilshire Boulevard.

CLA (3)-21 Park-and-ride -Any park-and-ride facilities in the vicinity of the transit corridors should be identified including any new proposed ones. Key intersections which provide access to the park-and-ride facilities should be identified and studied for traffic impacts due to the increase in vehicular traffic near the facilities.

Response: Intersections in the vicinity of community parking lots were included in the analysis of traffic impacts. Trips associated with the parking activity were added to the background traffic around the stations.

CLA (3)-23 17. Pedestrian circulation and safety—Bus lanes on Wilshire will preclude pedestrian crossings across Wilshire at unsignalized intersections. The SEIS/SEIR should address the resulting impacts on pedestrian circulation. Potential pedestrian safety problems with both bus lanes and light rail transit should be disclosed, and proposed crosswalk designs for intersections and mid-block should be described along with an assessment of the need for pedestrian gates.

Response: Because there will not be a permanently dedicated BRT lane anywhere on the project, it is not anticipated that the bus lanes on Wilshire Boulevard will preclude pedestrian crossings across Wilshire Boulevard at unsignalized locations. The LPA includes a peak hour bus only lane that would not significantly impact pedestrian circulation. Pedestrians will be permitted to cross Wilshire Boulevard at all of the same locations where they can legally cross today. No new pedestrian crosswalks at intersections, or at mid-block locations are proposed. In addition, adequate pedestrian sight distance will also be maintained at pedestrian crossings of Wilshire Boulevard.

As described in Section 3.2 of the FEIR, a protected right turn phase (a right turn arrow) may be added to selected intersections to clear right turning vehicles that are queued in front of a bus. This additional phase would require pedestrians traveling along Wilshire Boulevard to wait for the protected right turn phase to be completed prior to entering the intersection. Similar to the existing operation at the selected intersections, pedestrians will be controlled by pedestrian signals ("Walk"/"Don't Walk" signs) at the crosswalks. Special signs will be installed at the crosswalk locations to advise pedestrians to wait for the walk signal. Pedestrian swing gates are not required, nor recommended, for pedestrian crosswalks based on the alignment of the LPA.

CLA (3)-24 The document should also describe the projects' proximity to schools, school crossings and routes traversed by school children, analyze potential safety problems arising therefrom, and evaluate available safety enforcement mechanisms.

Response: Refer to all Responses to Comments provided in LAUSD (1) and LAUSD (3) through LAUSD (5) for a detailed description of all safety enforcement mechanisms.

CLA (3)-28 Community Plans (Wilshire alignment)-The Wilshire District Plan prohibits any widening of Wilshire between Vermont and Fairfax "in excess of the existing roadway." Wilshire Boulevard between Glendon and Club View Drive is located in the Wilshire-Westwood Scenic Corridor Specific Plan, development standards for which are intended to minimize traffic and parking problems along Wilshire, enhance aesthetic qualities and encourage open space. Wilshire between Federal and Centinela is located along the southerly boundary of the Brentwood-Pacific Palisades Community Plan and is proposed to be part of a new Wilshire Boulevard Community Design Overlay District (CDO). The CDO will guide new building design to enhance street appearance and encourage pedestrian activity. Both

Community Plans designate Wilshire between Granville and Wellesley as a mixed-use boulevard (residential and commercial development.) The implications of these factors on project design and land use consistency should be analyzed in the SEIS/SEIR.

Response: The proposed project does not include any widening of Wilshire Boulevard. Resurfacing (or re-paving) would only occur in the segment between San Vicente and Western (4 miles). For a further discussion of consistency of the proposed project with applicable community plans and policies, refer to Response to Comment CLA (1)-29. Furthermore, improved transit and stops should enhance street appearance and encourage pedestrian activity consistent with the CDO goals.

CLA (3)-32 *It is our understanding from discussion with MTA that the "No Build" alternative assumes Phase I Rapid Bus deployment on Wilshire and that the TSM alternative assumes Phase II and Phase III Rapid Bus deployment on Wilshire. New traffic counts will be needed after deployment of Phase I Rapid Bus services on June 24, 2000.*

Response: The implementation of the Phase I Rapid Bus did not affect traffic volumes on Wilshire Boulevard, so it was not necessary to re-count locations where recent traffic counts (consistent with LADOT policies for the age of counts) were available. Where no such counts were available, they were collected in July and August of 2000, after deployment of the Rapid Bus program. Typically, traffic and ridership counts following a transit improvement occur 18 to 24 months following the major marketing of the new service.

CLA (3)-34 *1. Peak hour only bus lanes in the curb lanes of Wilshire with TSM enhancements. This alternative will require analysis of impacts from removal or restrictions on right turns, removal of loading zones and limitations on driveway access.*

Response: The City of Los Angeles suggests that a peak-hour only bus lane in the curb lanes of Wilshire with TSM enhancements be analyzed as an alternative. The alternative being considered is a peak-hour bus only BRT system along Wilshire Boulevard, and impacts associated with this alternative are discussed in the Draft EIR.

Comment Letter 29: Community Redevelopment Agency Los Angeles, June 2001

CRALA (1)-3 *In evaluating corridor system alternatives—and in helping the larger public understand and evaluate these alternatives—we believe it is important for these corridor studies to provide a full and balanced context for the actions being proposed. However, the process now excludes any mention or acknowledgement of some very obvious, major alternatives. These omissions are most particularly pronounced in the alternatives presented for the Wilshire corridor on the Westside.*

Response: The Community Redevelopment of Los Angeles (CRA) comments that the environmental assessment excludes any mention or acknowledgement of some very obvious major alternatives. The CRA also states that these omissions are most particularly pronounced in the alternatives presented for the Wilshire Corridor on the Westside. Unfortunately, there is no mention of what these obvious alternatives might be. Please refer to Topical Response D for a discussion of the Major Investment Study preceding this environmental study, which analyzed a broad range of alternatives in order to identify a focused set of feasible alternatives for evaluation in the EIR.

CRALA (1)-6 *Loss of Return from Existing Investments. It has to be observed that the MTA and the City have made a very significant investment in bringing the Red Line to its current terminus at Western. Just as would be the case with a half-completed freeway or any other major element of infrastructure, stopping this system only part way from a natural destination greatly diminishes its ultimate potential value. This loss of investment value accrues not only to its existing service area (including the Wilshire/Koreatown Project Area) but to the communities of prospective future users to the west as well.*

It would be important, therefore, that the environmental assessment work in this corridor include an estimation of the potential economic, social and transportation benefits that would accrue if the existing rail subway were continued west in the same alignment as the proposed busway improvements. This would need to be compared with the similar, net benefits that would accrue with the proposed busway improvements. In each case, estimates of cumulative life-cycle costs would help qualify the corridor alternatives.

Response: The Community Redevelopment of Los Angeles (CRA) comments that it is important that the environmental assessment of the proposed project include an estimation of the potential economic, social, and transportation benefits that would accrue if the existing rail subway were continued west in the same alignment as the proposed busway improvements. This would need to be compared with similar net benefits that would accrue with the proposed busway improvements. Additionally, the CRA asks for estimates of cumulative life-cycle costs that would help qualify the corridor alternative.

Page 4 of the Executive Summary discusses the history of planning in the corridor, in particularly why extension of the subway is not being considered. Any analysis of the subway extension was included in the project Major Investment Study, February 2000.

CRALA (1)-8 *Concerns About Features of "Bus Rapid Transit" (BRT). The proposed "BRT" improvements, as presently defined, appear to only intersect the Agency's Wilshire/Koreatown Project Area at Western Avenue. However, CRA advisory committee members have been very vocal in communicating their concerns about this alternative's design to staff.*

Response: The Community Redevelopment Agency of Los Angeles (CRA) states that the BRT improvements intersect the Wilshire/Koreatown Project Area at Western Avenue, and the CRA advisory committee members have been very vocal in communicating their concerns about the design of the Wilshire BRT to the CRA staff.

The objective of the proposed BRT system along Wilshire Boulevard is to improve transit operations in this Corridor. To be most efficient and effective, the system must attempt to connect the most highly dense areas with potential riders in as direct and fast a manner as possible. However, even if the Wilshire BRT line does not specifically stop at an activity center, employment area, or other type of land use generating potential riders, it does not mean that its effectiveness is diminished. Rather, the BRT system provides one segment of a comprehensively linked transit network throughout the City and County. In addition, the flexibility and scheduling of BRT will also allow skip stop patterns and additional stops if prospective passengers will ride the service.

CRALA (1)-16 *Possible Alternative Bus System Improvements. The Agency believes that it is particularly important to strengthen the pedestrian sidewalk zone on heavily used urban streets such as Wilshire. This is important to the viability of small businesses and for residential livability. In addition to the median-based approach of the BRT alternative, we would, therefore, suggest MTA explore alternatives that might make use of and reinforce the established pedestrian sidewalk zones. These variations may well have their own compromises on parking and turning movements, however, and would need to be given the same rigorous evaluation and analysis that the BRT alternative is to be given.*

Response: The Community Redevelopment Agency of Los Angeles (CRA) suggests that the MTA explore alternatives that might make use of and reinforce the established pedestrian sidewalk zones.

The alternative under consideration along Wilshire Boulevard is the curb-lane, peak-hour only BRT system. It has been the MTA's objective in this study to evaluate transit improvements. The examination of a strengthened pedestrian sidewalk environment is beyond the MTA's objective of this study.

Comment Letter 30:City of Santa Monica, June 2001

CSM (1)-9 *Traffic Impacts: The use of an existing travel lane to provide the dedicated BRT right-of-way will impact traffic along Wilshire Boulevard. The City has the following concerns that need to be addressed:*

- *Intersection Impact: In the June 21, 2000 to MTA, at the outset of the environmental review process, the City identified seven intersection along Wilshire Boulevard with level of service E or F. There was no mention of these intersection [sic] in the April 6, 2001 Draft EIR and it is not clear whether these intersections were studied and, if so, what the result of the analysis concluded.*
- *Impacts of Signal Priority on Cross-traffic: The City requested that the document address the impacts of the proposed signal priority treatments on cross-street traffic.*

Response: The proposed project now entails operation of the BRT in the City of Santa Monica in the same manner as the existing Metro Rapid Bus, so it will not result in any traffic impacts in the City of Santa Monica. The arterial study intersections evaluated in the Draft EIR are illustrated on Figure 3.2-6. They include all of the intersections listed in this comment, except for the 17th Street/Wilshire Boulevard intersection. In addition to the seven Wilshire Boulevard intersections mentioned, the Draft EIR evaluated 12 intersections along Washington Avenue, Broadway, Santa Monica Boulevard, and Colorado Avenue to assess the potential impacts of diversion of traffic from Wilshire Boulevard to parallel streets. The analysis of this expanded list of intersections in Santa Monica provides decision makers with sufficient information to understand the impacts of the project alternatives. The impact of signal priority treatment was included in the level of service calculations through the inclusion of additional loss time at intersections to reflect clearance intervals when signal phases are modified to provide the BRT with priority. Refer to Page 3.2-81 of the Draft EIR for the discussion related to Alternative 1B.

Comment Letter 31: City of Santa Monica, June 2001

CSM (2)-7 *Traffic Impacts on Wilshire Boulevard: The use of an existing travel lane to provide the dedicated BRT right-of-way will severely impact traffic along Wilshire Boulevard. The City's recent traffic forecast, based on the cumulative projects planned, approved or under construction as of August 1999, resulted in Level of Service E or F during the morning or evening peak hour for the intersections listed below:*

5th Street and Wilshire Boulevard
6th Street and Wilshire Boulevard
Lincoln Boulevard and Wilshire Boulevard
17th Street and Wilshire Boulevard
20th Street and Wilshire Boulevard
26th Street and Wilshire Boulevard
Centinela Avenue and Wilshire Boulevard

Response: A dedicated transit lane is no longer being proposed in the City of Santa Monica.

Comment Letter 36: Automobile Club of Southern California, June 7, 2001

AAA (1)-3 *Separate the Wilshire Bus Rapid Transit (BRT) and Exposition BRT/Light Rail Transit (LRT) alternatives into two separate projects that can be evaluated, refined, and approved or rejected independently.*

Response: As noted in the preface to this chapter, the Wilshire BRT and Exposition LRT projects have been separated into two discrete projects. The Wilshire BRT is the sole subject of this environmental document. Comments pertaining to the Exposition LRT will be addressed in a separate environmental document.

AAA (1)-4 *Select the Transportation System Management (TSM) option, with enhancements to the existing Metro Rapid bus service, as the locally preferred alternative for Wilshire Boulevard at this time.*

Response: The Automobile Club of Southern California suggests that the MTA select the Transportation System Management (TSM) option as the locally preferred alternative for Wilshire Boulevard. However, the

alternative selected by the MTA Board as the LPA is the curb-lane, peak-hour BRT system along Wilshire Boulevard.

AAA (1)-10 All of the Wilshire BRT alternatives would have significant negative traffic impacts. These traffic impacts stem primarily from the removal of two travel lanes and some vehicle turning movements. In addition, the Wilshire BRT alternatives would negatively impact levels of service (LOS) at 13 to 20 intersections, depending on the specific alternative. Of the three Wilshire BRT alternatives studied, Alternative 1B (curb lane) would appear to have the least negative impacts. In this alternative, existing left and right-turn movements would be retained throughout the corridor.

Response: The comment notes that all Wilshire Alternatives will have significant impacts as described in the Draft EIR and states a preference for Alternative 1B. Of all the alternatives evaluated in the Draft EIR, Alternative 1B is most similar to the currently proposed project, although the proposed project will only be implemented during peak periods.

AAA (1)-11 The draft document indicated that 1,211, or 92%, of existing on-street parking spaces would be removed to make way for a Wilshire BRT project. This would have serious and immediate negative impacts on the businesses located along Wilshire Boulevard. The loss of these spaces, combined with the loss of 70 taxi, shuttle, and valet spaces, would also have a negative impact on customers, hotel guests, and restaurant patrons throughout the route. The final document should include an estimate of the demand for station parking and provide a plan for meeting this need.

Response: The parking impacts noted in this comment are no longer anticipated given that the proposed project will be implemented during peak periods only, when parking is already prohibited along most of Wilshire Boulevard. The demand for parking at stations is addressed in Section 3.3 (refer to Pages 3.3-7 & 3.3-8 of the Draft EIR).

Comment Letter 37: Building Owners and Managers Association, June 2001

BOMA (1)-6 Two additional lanes will be removed, leaving fewer lanes for the same number of cars.

Response: Two lanes will no longer be removed permanently. Instead, impacts are confined to peak periods only, rather than 24 hours per day when most parking on Wilshire Boulevard is already prohibited. Refer to Topical Response B for a discussion of impacts associated with the loss of a travel lane.

BOMA (1)-7 North/south traffic would be affected, as would entrance into the businesses.

Response: The impacts on north-south traffic at major cross streets was described in Section 3.2 of the Draft EIR. The impacts of the proposed project will be limited to the peak period only. The proposed project is not anticipated to affect the entrance to businesses as no left turns are proposed to be eliminated and right turning vehicles will be allowed to use the peak period BRT curb adjacent lane. An evaluation of the Metro Rapid Bus Transit Priority System was undertaken by LADOT in September 2000, three months after the beginning of the Metro Rapid service. [Refer to Transit Priority System Evaluation Report, April 2001, City of Los Angeles Department of Transportation, Frances T. Banerjee, General Manager.] The evaluation assessed two aspects of the Transit Priority System: (1) the overall travel time savings along the route and the reduction of transit vehicle stopped time at signals, and (2) the impacts to general automotive traffic from the implementation of the Transit Priority System. The evaluation was based on before and after studies on the Ventura Boulevard and Wilshire-Whittier Metro Rapid Bus lines.

Summarizing the findings of the evaluations, LADOT concluded the following:

- "This analysis shows that a 4-minute reduction in signal delay has been obtained from the Transit Priority System on Ventura Boulevard, which is a 36% reduction in the delays caused by traffic signals along the route."

- "The analysis shows that a 5-minute reduction in signal delay has been obtained from the Transit Priority System on Wilshire/Whittier Boulevards, which is a 33% reduction in the delays caused by traffic signals along the route."
- "Since each of the Metro Rapid Bus routes cross the twelve selected intersections on the eastbound and westbound approaches, the data for the northbound and southbound approaches represent the effect on cross street traffic. In general, there is only a slight impact to the cross street traffic of up to two seconds increase in delay. The average from all of the twelve locations was only one second of delay per vehicle per cycle. A decrease in delay was observed on the approaches moving concurrent with the priority phases of the same amount. Although there is some variation by location and time-of-day, the results of the analysis show that the overall impacts to cross street traffic are minimal."

The impact of the proposed BRT project transit priority treatment on north-south traffic flow is likewise expected to be minimal.

BOMA (1)-8 *Elimination of street parking is particularly damaging to the business community.*

Response: The parking impacts noted in this comment are no longer anticipated given that the proposed project will be implemented during peak periods only, when parking is already prohibited along most of Wilshire Boulevard.

BOMA (1)-9 *Local buses would continue to operate on Wilshire, causing further gridlock.*

Response: The commenter notes that local buses will still operate on Wilshire. This is correct. Local buses will travel in the curb lane along with BRT vehicles during peak periods. It is not anticipated that this will cause gridlock, as stated. BRT buses can pass local buses in one of the mixed-flow travel lanes if necessary, as the Metro Rapid buses do currently.

Comment Letter 38: Bus Riders Union, June 2001

BRU (1)-1 *We are writing to urge the MTA Board of Directors to reject the Mid-City/Westside Corridor Draft Environmental Impact Statement and the Environmental Impact Report. The Bus Riders Union opposes the proposed Mid-City/Westside Corridor project because the project violate the Consent Decree's mandate to prioritize the improvement and expansion of the existing bus system and because the project does not prioritize the needs of the transit dependent. The following are specific concerns raised by the Draft SEIS/SEIR itself:*

Response: The Consent Decree does not prohibit the MTA from investing in Bus Rapid Transit development or other modes of public transportation. The agreement outlines an action plan for improving the bus system and the MTA is making the required improvements.

BRU (1)-2 *1. <u>Draft EIR includes no alternative to the proposed Bus Rapid Transit or Bus Rapid Transit/Light Rail Transit Alternatives.</u> The Draft EIR studies only the impact of the Bus Rapid Transit and Light Rail Transit option and includes no study of cheaper, more efficient, alternative options such as the possibility of dramatically increasing bus service in the corridor and region. The Draft EIR compares the BRT or BRT/LRT option only to the no-Build alternative, an option that would mean making no transportation improvements in the corridor and region. There is a need for a new Draft EIR that studies low-cost alternatives such as a program that includes the full implementation of Rapid Bus, the introduction of MTA community shuttles and circulators, the creation of a freeway bus network throughout the region, and the purchase of expansion buses to comply with load factor deadlines agreed upon in the Consent Decree.*

Response: Please refer to Topical Response D for a discussion of the Major Investment Study preceding this environmental study.

The Draft EIR analyzed three alternatives: No Build, Transportation System Management (TSM), and the proposed Wilshire BRT. The TSM Alternative has been defined to specifically reflect the level of transit improvement that the MTA can reasonably be expected to undertake in the next 20 years. This alternative is built on expanding the existing bus rapid system and bus fleet. The TSM Alternative meets the requirement of the consent decree.

BRU (1)-3 *2. Draft EIR is a high-cost, low-benefit fixed guideway project that increases the inequity of subsidies for "new transit riders" over the needs of the transit dependent. The Draft EIR calculates that an important component for building and operating the BRT or BRT/LRT alternatives is the factor called the Cost per New Transit Rider—which calculates the annualized cost to build and operate the project in comparison to the projected number of new transit riders. The Draft EIR defines the new transit rider as a person who is attracted to ride public transit instead of driving a car as a result of a the new project. The amount of subsidy for this project for the relatively low ridership expectation is a clear violation of Consent Decree provision that states that MTA will ensure an equal and equitable transit access to the transit dependent. The subsidy costs are alarming for Alternative 1 (Wilshire BRT): the projected cost to attract 12, 200 new daily transit riders will be $9.00 per rider. The figures are much higher for Alternative 3 (Wilshire BRT and Exposition LRT): the projected cost to attract new riders will be at $12.80 per rider. If we were to compare the amount of these proposed subsidy per new riders to the amount of subsidies a passenger receives on the Vermont bus lines which ranges between .33 cents and $1.39 per passenger, we see the clear inequity.*

Response: While looking at the cost and benefit of different public transportation options, quality of service factors, such as speed, service reliability, schedule adherence and vehicle comfort, need to be included. Quality of life factors, such as impacts on development, air quality, highway congestion and the local economy, also need to be considered. The comparison of bus and rail costs is unequal. It looks exclusively at operating costs for bus, while the rail cost included capital, construction, and operating components. It also compared *all* riders for the bus service to *new* riders for the proposed project. Nonetheless, rail service generally does not compare favorably to bus service on a subsidy-per-passenger basis, as rail passengers often travel longer distances. When trip distance is taken into consideration or when passenger loads are large, rail is competitive with bus. The operating subsidy per passenger mile for the Metro Bus and Metro Rail system are very similar.

BRU (1)-4 *Draft EIR demonstrates the low ridership numbers that will be generated by the BRT or BRT/LRT in comparison to less costly options, such as Rapid Bus. The Draft EIR predicts a ridership between 39,600 to 83,900 (former for only Wilshire BRT option and latter for Wilshire BRT/Expo LRT full length), predicting only 12,200 to 27,200 new rides. Such numbers can not possible justify the exuberant cost of $304 million for Wilshire BRT only or the extremely high cost of $858 million for the Wilshire BRT/Expo LRT, when this is compared to the first two Rapid Bus Lines that have generated 20,000 new daily passenger trips (roughly 10,000 new daily riders) at a fraction of the cost of the BRT or BRT/LRT.*

Response: The MTA, the decision-makers for the proposed project, must consider all factors when deciding whether, or not, to approve the project, including the annualized cost per new daily transit trip (described in Chapter 5 of the DEIS/EIR). The cost of the curb lane BRT project are considerably lower than the costs cited in the comment. Much of this cost is for elements that will enhance the current Metro Rapid bus service and increase its carrying capacity.

BRU (1)-5 *Draft EIR does not genuinely address questions transportation equity and compliance with Title VI. In its section "Mobility of Transit Dependents", the Draft EIR suggests that because the eastern portion of both the Wilshire BRT route and Exposition routes pass through areas of Mid City and South Los Angeles, communities that are predominantly of color with a high percentage of auto-less households, the BRT or BRT/LRT would increase the level of transit service by reducing travel time and increase greater accessibility for the transit dependent. Given that the BRT or BRT/LRT projects go through the minority neighborhoods, it follows that those who will use it will be largely minorities and transit dependent. However, that does not mean that the BRT or BRT/LRT will be an overall transportation*

improvement for minority communities, rather it means that transit dependent in a region as undeserved as the studied corridor will use whatever form of transportation is available to them. The Draft EIR omits that the MTA is obligated by a signed consent decree to bring about transit equity through the meeting. If bus overcrowding reduction deadlines and through expansion of county-wide bus service, a process that will be undermined if its necessary funds are used to build the proposed BRT or BRT/LRT.

Response: Both the bus and rail programs serve transit dependents. Based on on-board surveys, about 45 percent of Metro Rail and 76 percent of the Metro Bus passengers do not have an automobile available to them. Furthermore, the alignment of the Wilshire BRT project serves areas with above average, transit-dependent densities in the County.

Comment Letter 40: Neighbors for an Improved Community, June 2001

CEN (1)-5 ADDITIONALLY, WE ARE CONCERNED THAT [sic] Our community was totally ignored by THE MTA DURING A CRITICAL STAGE OF THIS PROCESS. Absolutely no notification, involvement, or outreach was undertaken by MTA to contact residents living east of La Brea to Long Beach Boulevard. As a group of concerned residents, we have been alarmed about the proposed connected track since we first learned of it months ago when we tried to obtain the MTA right-of-way property for neighborhood park space. Our community was denied participation in the decision-making process totally ignoring all federal laws mandating that minority, low-income communities be notified from the very inception of a project such as this.

Response: The above comments refer to the Exposition Corridor, which will be the subject of separate FEIR. Notification of release of the Draft EIR is described in Section 5.0 of the FEIR and was made to the public in the following manner: sent to more than 250 agencies and organizations; executive summaries of the document were mailed to more than 2,000 individuals on the project mailing list; notifications of availability were distributed to approximately 8,000 people; advertising was placed in 8 newspapers; the MTA website offered a free download of the Executive Summary and full report; 25,000 "take-one" brochures were distributed on the MTA Metro Rapid Bus, at bus stops along Wilshire Boulevard, and at Metro Red Line stations at Wilshire/Western and Wilshire/Vermont; and printed copies were provided to the libraries listed in Section 9.13 of the Draft EIR. In addition, MTA hosted six scoping workshops throughout the project area between May 23, 2001, and June 8, 2001.

Comment Letter 43: Downtown Area Residents' Association, June 2001

DARA (1)-3 3. It notable that the "No Project" alternative was essentially eliminated from discussion in the Executive Summary of the Draft EIR that was provided to us—and presumably to others. While there may be adequate reasons for proceeding with a Mid-City/Westside Transit project, this omission detracts from the credibility of MTA's analysis and presentation—and MTA's credibility, as demonstrated by Proposition A's passage in 1998, is virtually nil. Moreover, many critical statements in this presentation are virtually unsupported assertions.

Response: The Downtown Area Residents' Association comments that the "No Project" Alternative was eliminated from the Executive Summary of the Draft EIS/EIR. A detailed discussion of the No Project Alternative was provided in Section 2.0 (Alternatives Considered) of the Draft EIS/EIR. In addition, any impacts associated with the No Project Alternative were analyzed throughout each of the impact categories within the Draft EIR.

Comment Letter 45: Friends 4 Expo Transit, June 2001

FET (1)-84 There are only a limited number of passages under the San Diego Freeway (405) in West Los Angeles—Sunset, Wilshire, Ohio Avenue, Santa Monica, Olympic, and Pico Boulevards (Screenline 4N, page 3.2-29). Especially during afternoon rush hour, they are all backed up for blocks. Even two-lane Ohio Avenue has long lines of cars

seeking to avoid Wilshire and Santa Monica. Sunset backs up from the west past Bundy. Wilshire backs up to Federal on the west and close to Beverly Glen on the east.

Response: The Draft EIR documents that there are many east-west streets, including those noted, that pass under the San Diego Freeway, which will be impacted by the loss of a lane on Wilshire Boulevard. The proposed project will lessen those impacts to the peak periods only, rather than 24 hours, and the mitigation measure requiring contribution toward implementation of the ATCS system on many parallel streets will remain for the proposed project to lessen these impacts.

FET (1)-85 *All of these alternates are already projected to be at LOS E or F (Figure 3.2-12, page 3.2-48).*

Response: Please refer to Response to Comment FET (1)-84 concerning streets that will be impacted by loss of a lane on Wilshire Boulevard.

FET (1)-86 *How would curb lane BRT lanes pass the Wilshire interchange with the 405 freeway?*

Response: The BRT vehicles will operate in mixed flow between Sepulveda Boulevard and Federal Avenue/San Vicente, thereby eliminating the need for weaving as described in these comments.

FET (1)-87 *Weaving of traffic onto and off of these ramps is already very difficult; which lanes would be taken for BRT, and how would freeway traffic cross them?*

Response: Please refer to Response to Comment FET (1)-86 regarding mixed-flow operation on the described segments.

FET (1)-89 *Conversely, from Highland Avenue to Wilton Place—past Hancock Park—traffic is generally free-flowing all day and dedicated bus lanes would provide little or no benefit.*

Response: An exclusive lane will allow buses to retain a constant speed in the face of varying traffic conditions and to continue to provide reliable travel speeds as general traffic speeds degrade over time.

FET (1)-92 *The bi-articulated buses proposed for Wilshire appear to be illegal under the California Vehicle Code. In addition, Wilshire BRT buses would operate in mixed-flow traffic, both east of Western Avenue and within the City of Santa Monica, and the length of the line if the bus lanes are peak-hour only. Can such 80-foot buses safely mix with traffic.*

Response: Although 80-foot-long buses were discussed in the Draft EIS/EIR, the project is presently planned to utilize 60 foot long articulated buses, which are commonly used in other U.S. cities.

FET (1)-94 *The Metro Rapid bus line 720 already carries 28,200 passengers per day on Wilshire and Whittier Boulevards (April 2001). It's not stated how many trips begin and end on the Eastside, but a large majority must involve the Westside.*

Response: The forecasted project ridership is describe in Section 2.7 of the FEIR including estimating of boardings for the full route to Montebello (26 miles).

FET (1)-95 *Projected Wilshire BRT ridership is 39,600—and only 32,500 combined with Exposition light rail. If 20,000 Metro Rapid trips include the Westside, that's 12,500 additional boardings for Wilshire BRT at the cost of $363 million. The Draft EIR's figure of 11,100 Incremental Linked Trips is out-of-date and should be updated. (Table 5-5, page 5-11)*

Response: Refer to Response to Comment FET (1)-94 for a discussion of Wilshire BRT boardings.

Comment Letter 46 : The Grand Olympic, April 2001

GO (1)-3 I would also like to address the statement in which you mention that there presently were not any special property taxes associated with the MTA rail projects except at the Red Line Station in Downtown Los Angeles. I would like to know for certain that our property taxes will not be affected by this as we were previously charged for other mass transit systems in the Downtown Los Angeles area that our company certainly did not benefit from.

Response: There will be no property tax (benefit assessment tax) adjustments due to this project.

Comment Letter 47: Holmby-Westwood Property Owners Association, June 2001

HWPOA (1)-8 The draft document was reviewed and discussed at the May 8, 2001 meeting of the Board of the association. The Board with one abstention, voted to oppose the 3 Wilshire Blvd. busway options discussed in the draft, and to take no position on the route and mode options of the Exposition Blvd. transit proposals discussed in the draft document. On instruction from the Board, I testified against the 3 BRT options at the West Los Angeles public hearing on May 15, 2001 and those comments are part of the public record.

Response: The FEIR does not recommend the implementation of a dedicated transit lane in the residential section of Westwood (Comstock to Selby) due to relatively high travel speeds in this area. The comments related to left-turn problems and loss of on-street parking are no longer applicable to the project as currently proposed because the project is located adjacent to the parking lane in Westwood and will not affect left-turn opportunities, nor will it significantly affect on-street parking.

HWPOA (1)-11 To suggest such impacts maybe mitigated by later engineering study fails the most important burden of proof requirement for this project, and that is, that those undefined engineering work options must mitigate to a level of environmental insignificance, the impacts you have identified as significant. Until you can make such a showing, you have not demonstrated the project will not impact access to the heavily developed high rise Wilshire Blvd. condo community and transfer substantial auto impact traffic onto adjacent residential streets. This failure to disclose and discuss mitigation solutions is the death sentence for this project as proposed.

Response: Please see response to HWPOA (1)-11 above.

HWPOA (1)-15 The draft fails to develop a plan for auto drivers to access the corridor. The minimal incremental ridership increase of the 3 RT proposals is the consequence of the inability of the busway to accommodate potential users who need to park someplace adjacent to Wilshire to access the busway.

Response: The transportation model run did not indicate a demand for park-and-ride facilities at the Wilshire BRT facilities. Because of high traffic volumes, the project does not seek to encourage additional automobile trip into the corridor.

HWPOA (1)-16 We urge you to consider joint venture parking development, such as joint development of UCLA lot 32 at Veteran and Wilshire, to both encourage and accommodate people who can only access Wilshire buses by auto.

Response: The MTA-owned properties at Wilshire/Crenshaw and Wilshire/La Brea are being considered for Wilshire BRT station community parking facilities. These facilities would be improved as part of an overall transportation and urban design benefit. Interim uses may include pedestrian-oriented retail, improved landscaping and lighting, and reconfigured parking area. Development of additional park-and-ride further west above the corridor could be considered at a future date.

HWPOA (1)-17 Federal and state funds are to be used to develop this project. These funds cannot be used in a discriminatory manner or to promote discriminatory results. The draft Wilshire busway options discriminate against a vast Westside population of potential transit users and only will deliver a system of transit that already exists, serviced by existing feeder north-south bus routes, and used almost exclusively by a low income transit dependent population.

Response: Section 4.7 of the Final EIR (Environmental Justice) indicates how the funding is used to maximize the benefit of the project to the persons and households in most need. As this is the densest corridor in Southern California, the need to build a project in this corridor would provide the greatest benefit to a broader section of the community, especially lower income and minority households. The need for increased mobility would allow all households greater access to more employment, educational and cultural opportunities within the confines of the funding guidelines.

HWPOA (1)-18 *As a senior low income, transit dependent transit user, I am familiar with the makeup of the current bus rider population since I occasionally use Wilshire buses to access my office via the Red line from my Valley Village residence in the San Fernando Valley. Since federal and state funding is required, the service must not only be available, but also accessible to the largest population demographic of the Westside, the auto driver, not just low income transit dependent.*

Response: Please refer to Response to Comment HWPOA (1)-17 for a discussion of funding for the project.

Comment Letter 48: Jack Allen, Attorney, June 2001

JA (1)-3 *In general PPA opposes all alternatives presented in the EIR, either the Wilshire BRT or the Exposition LRT. Both will cause more problems then they solve, primarily because both are at-grade projects, and both will seriously interfere with other vehicular traffic. As a result either will create more traffic congestion and seriously surface traffic that intersects with the routes. The Wilshire BRT, by taking out of use traffic lanes on Wilshire further cause congestion in the Wilshire Corridor.*

Response: The impacts on north-south traffic at major cross streets is described in Section 3.2 of the EIR. The impacts of the proposed project will be limited to the peak period only. The Draft EIR also documents that there are many east-west streets that will be impacted by the loss of a lane on Wilshire Boulevard. The proposed project includes mitigation measures requiring contribution toward implementation of the ATCS system on many parallel streets which is expected to lessen these impacts to a less-than-significant level along most street segments/intersections.

JA (1)-4 *Moreover, either will result in an increase in accidents on their routes.*

Response: It is not anticipated that the proposed project will result in an increase in accidents on Wilshire Boulevard. Buses would operate at the same frequency that they do today.

JA (1)-8 *In our opinion, the Wilshire BRT will still be too slow for most commuters and it is impractical. To be effective, busses [sic] must make frequent stops in order to first, pick up riders at points that are convenient for them to walk to; and second, to drop off commuters reasonably close to their destinations. Otherwise, commuters will not abandon their cars. Where a BRT might work in Brazil or other cities in the world, Los Angeles is not really conducive to BRT operations because of length of the Wilshire Corridor and the nature of the communities it serves. The projected 14 stops is far too few to be effective because too many commuters will either have to exit or enter at points too remote from their homes or offices or destinations for it to be convenient to use BRT.*

Response: The Wilshire BRT project is designed to operate as an "express" or "limited" service. This type of service targets commuters who are traveling longer distances and value time savings over convenience. The current station locations identified along the Wilshire Boulevard corridor were selected for their proximity to large activity centers or major transit routes. The number of stations the service accesses is limited in an effort to decrease the overall travel time from Santa Monica to downtown Los Angeles, or the reverse. The Wilshire BRT is not designed to replace the local bus service operating on Wilshire Boulevard, but rather to increase the transit options available.

JA (1)-9 For example, having bus stops only at La Cienega, Robertson, Beverly, and Santa Monica Blvds. in Beverly Hills will not serve riders in Beverly Hills. There should be additional stops at Doheny, Rexford, and Bedford. It also makes far too few stops in Santa Monica to be convenient for users. If there are not stops at Centinela, Yale, 26th Street (major north-south arterial), 20th Street, Lincoln Blvd. (another major north-south arterial), it will fail to serve Santa Monica. Yet that points up a major problem. Without adequate stops, the rider base is decreased significantly. On the other hand, adding stops means longer trips, which will also reduce ridership. In the end, the Wilshire BRT washes out so that a "No Alternative" is the preferable Alternative.

Response: The Wilshire BRT station spacing concept is comparable to the stops provided for the existing Metro Rapid service on Wilshire. Those users who need to stop at interim points along the route still can access local bus routes serving Wilshire, such as MTA Routes 20 through 22 and Santa Monica's Big Blue Bus Route 2. Furthermore, the BRT schedules can be designed to alternate or skip stops on alternating trips so that all major stops receive faster service. Refer to Response to Comment JA(1)-8 for a discussion of the general concept of the BRT service.

JA (1)-18 The alternatives reintroduces [sic] the same problems [sic]. The Blue Line has proven that surface rail is an invitation to accidents. Surface trains create such delays that both drivers and pedestrian will seek to make dangerous crossings. It is human nature and it unavoidable.

Response: Light rail is not proposed for implementation on Wilshire Boulevard. Impacts of the Exposition Light Rail project will be the subject of a separate EIR.

JA (1)-19 But a more serious problem will result and that is severe interference with rush hour traffic which must cross either Wilshire or Exposition Blvd. Table 2-8 states that there will be a 2.5 minute combined time frequency during peak hours. That means that every two and a half minutes, a train will cross an intersection on Exposition Boulevard. That means that for each signal and gates to fall and then rise again and for the signal to recycle will take two minutes leaving only 30 seconds for traffic to cross the intersection. Many of the intersections that the busses [sic] and trains will cross are already in an F condition during peak hours.

Response: The buses will cross east-west streets simultaneously with the east-west arterial street traffic. While they may receive an extended green signal indication to proceed through an intersection with priority, without stopping, this will only be accomplished within the context of the overall signal system and signal progression on both east-west and north-south streets. This is already occurring on Wilshire Boulevard as part of MTA's Metro Rapid Service without an significant adverse effects. North-south traffic will not be restricted to only 30 seconds every 2.5 minutes, as suggested in this comment.

JA (1)-20 The delays caused by the busses [sic] and train will only exacerbate the congestion. The EIR minimizes the impacts that this will have and it is inaccurate for the EIR to minimize the impact that such congestion will have on adjacent neighborhoods as drivers seek alternate routes to avoid the worse intersections such as La Cienega, Pico, etc.

Response: The proposed project will not restrict turns along Wilshire Boulevard and should therefore not result in a significant diversion of traffic to residential streets, as noted in the Draft EIR for applicable alternatives. Refer also to Response to Comment JA(1)-3 for a discussion of impacts to vehicular traffic.

Comment Letter 56: Park Wilshire Homeowners Association, Inc., June 2001

PWHA (1)-2 The Wilshire Boulevard Corridor (between Comstock and Westwood Boulevards) is already adversely impacted by the combination of high volume, excessive speed, dangerous turn conditions, frequency of collisions, accidents, and traffic noise. Speeding buses in exclusive lanes will only add to the congestion woes of this heavily traveled Boulevard.

Response: Buses will not be speeding in exclusive lanes. They must obey the posted speed limits.

PWHA (1)-4 In the afternoon/early evening period, in the westerly direction, there are daily traffic backups from the 405 Freeway back through the Corridor because of Freeway congestion. Cars are barely moving, bumper to bumper, suddenly changing lanes, going into side streets and coming out on Wilshire again, with frustrated drivers trying to gain some advantage to reach the Freeway. The amount of air and noise pollution emanating from this stagnant mass of cars and buses is horrendous.

Response: Refer to Topical Response C for a discussion of design options relative to turning prohibitions. This comment is no longer applicable to the proposed project.

PWHA (1)-5 Any new lanes for express buses would quickly see themselves filled up with these same frustrated drivers and their vehicles to no advantage to the proposed lanes! Policing might help in the first few days but afterwards there will be no advantage to the bus rider. These buses will just be spewing out their emissions to the high-rise residents as they idle and fight for position in this section of the Boulevard. It is a dream to believe that this proposal will be a solution to population growth. The EIR is astonishingly biased and misleading in its view of the environmental and safety impact on the residents and employees of the Corridor.

Response: Police enforcement will be employed to ensure that only buses and right-turning vehicles utilize the dedicated BRT lane during peak periods. This should prevent the problem of congestion in the curb lane forecast in this comment.

PWHA (1)-6 The potential decrease in vehicle lanes to accommodate the bus lanes will breed an increase in CO emissions as traffic moves slower on balance through the area. Your EIR is negligent in not assuming an increase in pollution in certain pockets of Wilshire Boulevard such as would occur on the Corridor. Your statistics may hold up on average for the entire length of Wilshire Boulevard, but you would certainly adversely impact the pollution circumstances on the Corridor!

Response: The Park Wilshire Home Owners Association, Inc. comments that the Draft EIR does not assume an increase in pollution in certain pockets of Wilshire Boulevard.

Increases in CO are likely to occur at intersections where an increase in traffic congestion is anticipated as a result of the proposed project. The traffic analysis of 158 intersections within the transit corridor projected the increase in vehicular traffic for each of the intersections under "with project" conditions. Based on the analysis, the "CO Hotspot Analysis" in Section 3.8B of the Draft EIR analyzed CO concentrations at areas within the transportation corridor that are adjacent to the most congested 31 of the 158 study intersections. The selected 31 intersections were designated as being significantly impacted by traffic and would have a level of service (LOS) of F under project conditions. LOS is a qualitative description of operating conditions ranging from LOS A, which represents free-flow conditions with little or no vehicular delay, to LOS F, which represents jammed conditions with excessive vehicular delays. Seven of the 31 studied intersections, which have LOS F, are located on Wilshire Boulevard. High CO concentrations are typically found along areas adjacent to congested roadway intersections. Thus, CO concentrations at intersections with an LOS of A, B, C, D, or E would not be as high as the CO concentrations at intersections with an LOS of F. Results of the "CO hotspot analysis" indicate that CO concentrations under future project conditions at the most congested intersections along Wilshire Boulevard would not exceed the State CO standards. Thus, it is also anticipated that less congested intersections on Wilshire Boulevard with an LOS of A, B, C, D, or E would not exceed the State CO standard.

PWHA (1)-8 In section 3.13, the assumption that there will be a reduction of fuel consumption is questionable when one considers the increased slowdown of vehicles idling in the Corridor because of the Freeway congestion.

Response: The Park Wilshire Home Owners Association, Inc. does not believe that there will be a reduction of fuel consumption (Section 3.13) since vehicles will be idling in the Corridor due of the Freeway congestion.

Fuel consumption in the DEIS/DEIR was calculated based on vehicle miles traveled in the region. The analysis indicates that fuel consumption would decrease, since the Wilshire BRT Alternative would result in a decrease in VMT over the No Action Alternative. Comparison of VMT over the vehicle hours traveled (VHT), which were derived from the MTA transportation model, is an indicator of vehicle delay. When comparing VMT to VHT from the MTA model, results show that speed of automobiles under the Wilshire BRT would incrementally decrease by 0.01 mile over the No Action Alternative. This decrease in vehicle speed in the region is not high enough to significantly increase the amount of fuel that is consumed.

Comment Letter 57: Samitaur Constructs, June 2001

SC (1)-14 *And of course, the infamous Alquist-Priolo earthquake fault zone runs right through the area. You seem to have missed that point in your Environmental Impact Report. This fact alone should be reason enough to conclude that your analysis of our neighborhood is severely lacking.*

Response: Samitaur Constructs comments that the Alquist-Priolo earthquake fault zone runs right through the project area and the Draft EIR does not indicate this point. As discussed in Section 3.6 (page 3.6-3) and shown in Figure 3.6-2, there are several Alquist-Priolo earthquake fault zone are within the transit corridor. However, the Wilshire BRT alignment is not within the Alquist-Priolo earthquake fault zone.

Comment Letter 63: Wilshire Advocates Coalition, May 2001

WAC (1)-6 *3. The EIR does not include, but should include the reference to the Wilshire Advocates Position (September 26, 2000) or the letter from the City of Los Angeles Department of Transportation (dated June 22, 2000—attached), nor does it include any letters from city, state and federal agencies (Beverly Hills, Santa Monica, LADOT, Federal Transit Administration—attached).*

Response: The Wilshire Advocates Coalition letter was received as part of the Major Investment Study as well as the over 300 petition comments during the Draft EIR comment period. The Locally Preferred Alternative adopted by the Board addresses those concerns by not implementing fully dedicated 24-hour Bus Rapid Transit lanes or removing medians or eliminating car parking in off peak-hours.

Comment Letter 64: The Westford Condominium Association, May 2001

WCA (1)-2 *The Wilshire Blvd. Corridor (between Comstock and Westwood Blvds.) is already adversely impacted by the combination of high volume, excessive speed, dangerous turn conditions, frequency of collisions, accidents, and traffic noise, <u>without</u> making it more convenient for these circumstances to multiply. Speeding buses in exclusive lanes will only add to the congestion woes of this heavily traveled Boulevard.*

Response: Refer to Topical Response B. Buses will not be speeding in exclusive lanes. They must obey the posted speed limits.

WCA (1)-4 *In the afternoon/early evening period, in the westerly direction, there are daily traffic backups from the 405 Freeway back through the Corridor because of the Freeway congestion. Cars are barely moving, bumper-to-bumper, suddenly changing lanes, going into side streets and coming out on Wilshire again, with frustrated drivers trying to gain some advantage to reach the Freeway. The amount of air and noise pollution emanating from this stagnant mass of cars and buses is horrendous.*

Response: The project is no longer recommending the implementation of a peak period curb lane in the segment of Wilshire Boulevard between Comstock and Selby. If the peak period lane were implemented near the I-405 Interchange and through the commercial portion of Westwood, the FEIR acknowledges that a significant adverse traffic impact would occur at Wilshire/Westwood intersection, which would require a Statement of Overriding Considerations The EIR also indicates, however, that the dedicated transit lane would increase the

capacity of Wilshire Boulevard to move people, even though the number of automobile would be reduced. The Wilshire BRT project would carry more People on Wilshire Boulevard than the existing street configuration and is , therefore, recommended as a public benefit.

WCA (1)-5 Any new lanes for express buses would quickly see themselves filled up with these same frustrated drivers and their vehicles to no advantage to the proposed lanes! Policing might help in the first few days but afterwards there will be no advantage to the bus rider. These buses will just be spewing out their emissions to the high-rise residents as they idle and fight for position in this section of the Boulevard. It is a dream to believe that this proposal will be a solution to population growth. The EIR is astonishingly biased and misleading in its view of the environmental and safety impact on the residents and employees of the Corridor.

Response: Police enforcement will be employed to ensure that only buses and right-turning vehicles utilize the dedicated BRT lane during peak periods. This should prevent the problem of congestion in the curb lane forecast in this comment.

WCA (1)-6 The potential decrease in vehicle lanes to accommodate the bus lanes will breed a further decrease in vehicle speeds and therefore greater retention time for an increase in CO emissions as traffic moves slower on balance through the area. Your EIR is negligent in not assuming an increase in pollution in certain pockets of Wilshire Boulevard such as would occur on the Corridor. Your statistics may hold up on average for the entire length of Wilshire Boulevard, but you would certainly adversely impact the pollution circumstances on the Corridor!

Response:

WCA (1)-8 In section 3.13, the assumption that there will be a reduction of fuel consumption is questionable when one considers the increased slowdown of vehicles idling in the Corridor because of the Freeway congestion.

Response:

WCA (1)-12 We encourage you to consider a Santa Monica Boulevard alternative "paralleling" the Corridor as being more sensible than "damaging" this outstanding residential area of the city. Thank you for your consideration.

Response: Please refer to Topical Response D for a discussion of the Major Investment Study preceding this environmental study. Further, the Wilshire Boulevard Corridor is the primary location of the trip generators/attractors; therefore, relegating public transit to side streets or parallel streets would be inconvenient to the transit user.

Comment Letter 65: Westwood Homeowners Association, June 2001

WHA (1)-1 We support the concept of improved transportation in the Westside. Nonetheless, a dedicated bus lane between Beverly Hills and the San Diego Freeway is not an improvement, and we are opposed to it. We are Wilshire Corridor adjacent residents and are frightened at the prospect of even greater imprisonment through creation of bottlenecks at the westerly and easterly boundaries of Westwood through the reduction to only two lanes of automobile travel.

Response: The project is no longer recommending the implementation of a peak period curb lane in the segment of Wilshire Boulevard between Comstock and Selby. If the peak period lane were implemented near the I-405 interchange and through the commercial portion of Westwood, the FEIR acknowledges that a significant adverse traffic impact would occur at Wilshire/Westwood intersection, which would require a Statement of Overriding Considerations. The EIR also indicates, however, that the dedicated transit lane would increase the capacity of Wilshire Boulevard to move people, even though the number of automobiles would be reduced. The Wilshire BRT project would carry more people on Wilshire Boulevard than the existing street configuration and is therefore recommended as a public benefit.

WHA (1)-5 This neighborhood is immediately adjacent to Century City and already suffers from Century City cut-through traffic, which the MTA EIR recommendations for the Santa Monica Transit Parkway acknowledges. Increased cut-through traffic cause by Bus Rapid Transit changes would seem to place a doubly unfair burden on this part of Westwood.

Response: It is not anticipated that the proposed project will result in cut-through traffic on residential streets in the Westwood or Century City areas. No dedicated transit lane is recommended any longer in the segment of Wilshire between Comstock and Selby and theefor the project would maintain existing operations of Metro Rapid Bus in this area.

WHA (1)-6 Furthermore, east-west improvement is not an advantage without improvements on north-south traffic. Improved flow on Wilshire Boulevard and on the Santa Monica Transit Parkway may act as a magnet to draw more San Fernando Valley commuter traffic on to Sepulveda Boulevard, the 405 Freeway, Roscomare Road, Beverly Glen Boulevard, Benedict Canyon Boulevard, etc.

Response: It is not anticipated that the proposed project will attract more north-south traffic onto the streets network. The San Diego Freeway (I-405) is currently being widened in the southbound direction to add capacity over the Sepulveda Pass and studies are underway to design and environmentally clear a similar widening in the northbound direction, which may increase traffic volumes.

WHA (1)-7 The problem is especially exacerbated during the next several years while there is so much traffic between the 405 and Westwood Boulevard for dirt hauling for, and construction of, the new UCLA hospital.

Response: The proposed project will be limited to peak periods only, the time period which is generally avoided by construction haul traffic.

WHA (1)-8 Given that the current plan appears to benefit solely those who have long journeys or Wilshire walking distance departure and destination points that would make the busses [sic] a reasonable mode of transportation, the plan appears to have very limited potential use for Wilshire adjacent residents. Only those with a Wilshire destination would convert from car to bus. Given this likely little benefit of the bus to Wilshire adjacent residents, such as Westwood Wilshire adjacent residents, the entire, significant burden of the plan should not fall on us who must continue to use our cars.

Response: The success of Metro Rapid along Wilshire suggests there is a valid need to address longer trips not adequately served by local bus-type services. While some adjacent residents may not be able to take advantage of this service, there are a large number of transit users living along the Wilshire Corridor who will directly benefit from this project. The purpose of the environmental process is to ensure that impacts and mitigations are adequately identified and addressed, so that decision makers can weigh whether the expected benefits are greater than the negative impacts.

Comment Letter 66: Wilshire Terrace, June 2001

WT (1)-3 In addition to the above it is likely that the slowing of traffic caused by fewer lanes for automobiles will create many more traffic jams thereby causing increased emissions along the corridor, once again to the detriment of the primary age group.

Response: Wilshire Terrace comments that the slowing of traffic caused by fewer lanes for automobiles will create many traffic jams and thus, would cause increased emissions along the corridor. The project under consideration is a curb-lane, peak-hour only BRT system along Wilshire Boulevard. The proposed project would not permanently remove any existing lanes on Wilshire Boulevard. Potential increase in pollutant emissions and concentrations are discussed in Section 3.8 of the Draft EIR.

Comment Letter 73: Adeli A. Anathan

ADA (1)-2 *Should you provide more bus lines, the accident level would increase ten fold. At the present time accidents occur almost daily at the corner of Wilshire and Beverly Glen.*

Response: The project does not propose to increase the number of buses on Wilshire Boulevard. The number would remain the same, but larger buses would replace the existing buses on a one-for-one basis. Buses would travel at prevailing traffic speeds, as they do today, but delay would be reduced by shortening the amount of time that the buses are stopped at red lights or at stations. Safety and security concerns are addressed in Section 3.7 of the FEIR.

ADA (1)-3 *The absence of green arrows at all lighted cross walks is conspicuous by their absences.*

Response: It appears that the commenter is suggesting green arrows for left turns at all signalized intersections ("lighted crosswalks"). This suggestion is unrelated to the BRT project. Therefore, please refer to Standard Response C for a discussion of left-turn phasing associated with the proposed project.

Comment Letter 79: Alan D. Havens, June 2001

AH (1)-7 *I would also suggest that if there is opposition to loss of on-street parking space in certain sections, it might be possible to install a single median bus lane only in particular areas to allow the buses to circumvent highly congested mixed flow lanes. This might be a reversible lane with buses using it in one direction during the A.M. peak and the other direction during the P.M. peak. Buses using the bypass lane would of course have signal priority as do the Route 720 buses today, but the buses in the reverse direction in mixed flow lanes under this scenario should be given either a higher level of priority, to keep them moving. Of course, double lanes would be required at bus stops, except where sidewalk stations are used.*

Response: The commenter suggests an alternative with a reversible median lane that had not previously been considered. Because of the Scenic Highway designation for Wilshire Boulevard and left turn impacts, the median lane alternative has been eliminated. Also, the project currently minimizes the elimination of on-street parking by operating in the curb lane during peak periods only, when parking is prohibited.

Comment Letter 81: A.I. Halsema & Carol Linell-Halsema, May 2001

AHA (1)-1 *Having read the Executive Summary of the Draft Environmental Impact Report of the Mid-City Westside Transit Corridor, I'm surprised that the MTA would consider motorists "redistributing themselves" (page 30) to new routes mitigation. This is in fact redistributing the problem.*

Response: The commentor disagrees with the conclusion drawn by the Draft EIS/EIR study that the mitigation of the removal of traffic lanes along Wilshire Blvd can be lessened with the implementation ATCS traffic signal improvement system. Please see Topical Response B.

Comment Letter 83: Anna Levib

AL (1)-2 *Why build a transit system that cannot continue to, and along, Beverly Hills.*

Response: The Wilshire BRT project provides continuous bus service from downtown Santa Monica through the Westside, including the Beverly Hills area. In the portions of the route where an exclusive bus lane is not provided, the buses operate in mixed traffic, similar to how Metro Rapid buses operate today.

AL (1)-3 *The traffic snafu on Wilshire will be a nightmare.*

Response: The comment refers to an anticipated traffic "snafu" on Wilshire, which is interpreted to mean the impacts associated with the loss of a through lane. Refer to Topical Response B for a discussion of the loss of a through lane during the peak period only.

AL (1)-4 *I live a block from Wilshire. We have two hundred drivers in our building. Very few would be served by this proposed system.*

Response: The ridership forecast uses information on socioeconomic demographics and travel patterns to estimate usage. Some zones in the model have greater proportions of people using transit than other zones. Ridership results are discussed in Section 5.2.1, of the Draft EIR. It is not anticipated that everyone would use the transit system; however, as congestion increases, transit ridership is anticipated to increase as well.

Comment Letter 87: Alexander Friedman, April 2001

ALF (1)-11 *On Page 4 of the Executive Summary, I read the following, "Also, in November 1998, LA County voters passed an initiative prohibiting further use of local sales tax dollars to build subways..." Frankly, this is the most absurd decision I have heard. I am wondering why was the public never notified prior to the voting and have not given an option to decide. And why has subway building been prohibited?! It makes absolutely no sense to prohibit construction of the most convenient and reliable public transportation alternative. I strongly recommend reconsidering this option and continuing to build the subway, as it was originally planned to. Moreover, I recently conducted a survey, collecting people's opinions regarding subway construction, focusing on extending metro-rail to the Westside. I got approximately 95% support on that.*

Response: County law currently prohibits the use of County sales tax for Metro Red subway construction. Changing current legislation is beyond the scope of this EIR.

Comment Letter 92: Alan K. Weeks, June 2001

ALW (1)-6 *The RTD and the MTA Boards have always listened to one small community of NIMBY's who are opposed to a rail line. Why not listen to the silent majority who have always seen the need and want it built. The MTA has the authority and all they need is the political will to build it.*

Response: The history of the development of the proposed project along Wilshire Boulevard is discussed on page 4 of the Executive Summary in the Draft EIR. In particular, this section discusses why the extension of the Metro Red Line is no longer under consideration, which is that: 1) the MTA suspended work on extensions due to funding shortfalls and 2) the Los Angeles County voters passed an initiative prohibiting further use of local sales tax dollars to build subways. Significant portions of the funds necessary to build the subway extensions to Pico/San Vicente were anticipated to have come from local sales tax revenues. As a result, the extension of the Metro Red Line is not under consideration.

ALW (1)-12 *The MTA and others have done early studies on the possibility of a Crenshaw Corridor Light Rail Line. If this line is ever built it could connect the Exposition Corridor Light Rail Line to the Green Line thus giving a great number of potential riders access to LAX via the Green Line.*

Response: The study of transit improvements in the Crenshaw Corridor is outside the scope of this present study. However, both the present study and any study within the Crenshaw Corridor are under the purview of the MTA, which would consider and foster any opportunity for greater connectivity among its transit systems.

Comment Letter 101: Anonymous

ANON (2)-1 *We believe that the busses [sic] should be double decked, instead of the two lanes of traffic for cars deleted in place of two-way busses [sic]. Letting people out in the middle of the street will add to the carnage we now have on the corridor.*

Response: The Locally Preferred Alternative adopted by the MTA Board and which is being evaluated in the Final EIR is the Wilshire BRT operating in the curb lane only during peak hours. Patrons will not disembark from the buses in the middle of the street, but at the sidewalk. Double-decked buses, while increasing capacity to each bus, do not help to maintain a good operating speed for buses caught in congestion.

ANON (2)-3 With only two stops: Westwood Blvd. and Warner, we will have more foot traffic on the boulevard, and the busses [sic] will drive traffic to the side streets in school and residential areas.

Response: While there are only two stops for the BRT in Westwood, there will still be local bus stops in between. No bus stops will be removed. Please refer to Topical Response B with regard to the diversion of traffic. It should further be noted that traffic forecasts for 2020 indicate that diversion would occur due to gridlock conditions on most roadways. The proposed project is anticipated to attract new riders to the transit system and funding is proposed to assist in monitoring neighborhood traffic diversion and developing neighborhood-level traffic controls.

ANON (2)-4 Double decked busses [sic] would double the ridership without causing more traffic than now, and reduce the pollution which will be caused by these additional vehicles.

Response: Double-decker buses were considered but were subsequently rejected due to safety concerns. Specifically, while the severe cross-fall of the curb lane on Wilshire Boulevard will be leveled out somewhat by the project, MTA does not believe that riders could be safely boarded and de-boarded in double-decker equipment as quickly and as safely. In addition, double-decker buses would require investing in major infrastructure improvements at MTA, including modifications to maintenance service pits, bus washer machines, and tools and equipment. This would not be necessary with standard, low-floored, articulated buses.

Comment Letter 112: Anonymous

ANON (12)-2 If we lose a traffic lane on Wilshire Blvd., 8th Street will just become worse, especially for residents such as myself, who enjoy walking in our neighborhood. Also, 6th street, 3rd Street and Olympic Blvd. are already a mess, in case the MTA hasn't noticed. 3rd Street, with the addition of the new shopping mall at the Farmers Market, is going to become even busier. (Not to mention Fairfax Ave). Don't make our problems on surrounding streets worse by forcing more traffic onto them.

Response: See Topical Response B. The impacts on north-south traffic at major cross streets were described in Section 3.2 of the Draft EIR. The impacts of the proposed project will be limited to the peak period only. The Draft EIR also documents that there are many east-west streets that will be impacted by the loss of a lane on Wilshire Boulevard. The proposed project will lessen those impacts to peak period only, rather than 24 hours, and the mitigation measure requiring contribution toward implementation of the ATCS system on many parallel streets will remain for the proposed project to lessen these impacts. The mitigation measure for monitoring neighborhood traffic and developing neighborhood-level traffic controls will also minimize the impacts.

Comment Letter 122: Anonymous

ANON (22)-1 <u>Please</u> reconsider the possibility of a subway! Subway is the <u>only</u> and yet the <u>best</u> solution to reducing traffic. Subway should extend from Hollywood/Highland Station into Santa Monica. Thank you!

Response: Please refer to Page 4 of the Draft EIR for a discussion of the reason subway transit is not being considered. Also refer to Response to Comment ALW (1)-6 above.

Comment Letter 134: Aiko Takeshita, May 2001

AT (1)-3 This Alternative 3 will also cost $1.0 billion (Wilshire Bus Rapid Transit plus Exposition Light Rail Transit) vs. $654 million for Alternative 2 (Wilshire BRT plus Exposition BRT)—almost twice as much!

Response: There is no difference in cost for the Wilshire BRT. Alternative 3 (Wilshire BRT/Expo LRT) costs almost twice as much as Alternative 2 (Wilshire BRT/Expo BRT) due to the capital costs associated with light rail. The LRT portion of this project is being deferred to a future, separate study. This Final EIR focuses on the BRT system only.

Comment Letter 136: Alexis Wieland & Annette Mercer, June 2001

AW (1)-9 *While we understand the negative impacts of night time [sic] construction, please consider using monetary incentives and allowing our 24 hour construction in order to substantially shorten the entire construction period.*

Response: The specific construction schedule will be developed by the design-builder who will be selected by the MTA Board after the Preliminary Engineering is developed. It is generally in the interests of a design-builder to accomplish work as expeditiously as possible.

AW (1)-12 *ES-20: The table referenced does NOT compare costs to the No Build or TSM as the text says it does.*

Response: The commenter correctly identifies that the table on page 19 of the Executive Summary does not compare costs to the No Build or TSM option as the text indicates. Instead, Table 5-3 and Section 4 of the Draft EIR cover cost effectiveness. The Wilshire BRT will cost $6.9 million more than the No-Build Alternative in annual operating and maintenance costs.

AW (1)-14 *ES-28: Why is noise and vibration listed as residual impact when the Table says LSM?*

Response: As reflected on page 28 of the Executive Summary of the Draft EIR, in cases where residual noise and vibration impacts remain after mitigation, property specific pre-construction surveys would be necessary to identify supplemental mitigation measures such as soundproofing of foundations and other structural components of the affected structures. With these additional mitigation measures, vibration impacts could be reduced to less-than-significant levels.

AW (1)-16 *ES-45: Please explain the tons of NOX variation between the three alternatives.*

Response: The CEQA Guidelines require that environmental documents identify the environmentally superior alternative among the build options being considered by the lead agency. The assessments presented in the Draft EIR indicate that Alternative 3 (Wilshire BRT/Exposition LRT) would result in the greatest transit benefits to the traveling public when compared with the other alternatives. The NO_x variations between alternatives are detailed Sections 3.8A and 3.8B of the Draft EIR for construction and operation, respectively. The proposed project, Alternative 1B, has a less-than-significant NO_x impact.

AW (1)-22 *3.4-14: We disagree that the Third Street Promenade is dependent on street parking—Santa Monica has several multilevel structures to service the Promenade.*

Response: The commenter disagrees that the Third Street Promenade businesses depend upon on-street parking for customers. It is true that the visitors to the Third Street Promenade do have several public parking structures available to them; many people have commented about the importance of on-street parking for commercial establishments in Santa Monica. However, this is no longer an issue with the proposed project since on-street parking would not be removed.

AW (1)-28 *Safety: The crosswalks with the lighted bumps should be used for added visibility and awareness.*

Response: Crosswalks with in-pavement lighting may be an option at crosswalks with limited sight distance. These are currently being tested at numerous locations throughout the State and MTA will consider their use in future preliminary engineering.

BEG (1)-2 The Wilshire Corridor is already overwhelmed by traffic congestion, accidents, noise, and air pollution. Adding the BRT will only add to these woes.

Response: The commenter notes the existing congestion on Wilshire. The Final EIR disclosed the impact of the project alternatives on Wilshire Boulevard in Section 3.2. Refer also to Topical Response B regarding the loss of a travel lane on Wilshire Boulevard.

Comment Letter 144: Barbara Filet, May 2001

BF (1)-4 I would rather see an elevated monorail, or more ways that the busses [sic] can prevail within auto traffic for a speedy trip by controlling stop lights. I have ridden the Rapid busses [sic] and am dismayed that they do not have the power to keep lights green.

Response: Full signal preemption was considered but found to be inadvisable to implement due to the frequency of the BRT service and impacts caused by long stopping time to accommodate north-south traffic.

BF (1)-5 Busses should also get priority treatment because they carry more riders. They should rule the road and always prevail over autos. Let's get our values straight!

Response: The ability of transit vehicles to have priority treatment at intersections must be coordinated with local jurisdictions. To date, the LADOT has been able to grant some level of priority treatment to some of the Metro Rapid service while still balancing other traffic needs. Because of the significant traffic levels on major north-south streets in the study area, full priority for transit vehicles is not possible without causing substantial impacts to north-south automobile traffic. The MTA is working closely with local jurisdictions towards providing as much transit priority as possible.

Comment Letter 181: Charles Edelson, June 2001

CE (1)-2 This letter is essentially an update of the letter I previously sent you on June 15, 2000 in response to the preliminary plans you presented last year. (My previous letter may be found in the General and Associations Section of the Technical Reports Volume of the Draft EIR. A copy is also appended.) At that time I pointed out several problems which I anticipated would have a serious detrimental environmental impact on my local neighborhood and I suggested that traffic simulations be run to determine if the impact would be as bad as my professional opinion suggested. Unfortunately, our Draft EIR chose not to respond to my request despite the fact that I am a Professional Engineer registered to practice in the State of California.

Response: The Draft EIR used the MTA regional travel demand forecasting model, which is the FTA-certified model for NEPA studies, to produce traffic and transit ridership forecasts for this analysis. It is a dynamic model that simulates future conditions based on changes in population and employment, transit service, and transportation infrastructure (e.g., roadway improvements and cost of travel factors).

CE (1)-3 Instead the DEIR takes the stand that study of any local traffic impacts may be ignored or delayed until after the project has been built. (See Executive Summary, page 31—Traffic and Circulation—Traffic Diversion (Section 3.2))

Response: The actual traffic diversion encountered will be mitigated by monitoring programs and institution of neighborhood traffic control programs by local jurisdictions. We believe this to be an effective and reasonable approach given the uncertain nature of diverted traffic.

CE (1)-4 I call to your attention that failure to conduct an appropriate environmental impact study even after a serious detrimental impact is called to your attention, is in violation of the California Environmental Quality Act (CEQA) and that any attempt to proceed on the basis of this disregard of the environmental impact of your current plans, makes you, the MTA and the MTA Board vulnerable to legal action under this Act.

Response: Pursuant to CEQA guidelines 21151(a) all local agencies shall prepare, or cause to be prepared by contract and certify the completion of, an environmental impact report on any project that they intend to carry out or approve which may have a significant effect on the environment. The firm of Meyer, Mohaddes Associates, Inc. was contracted to conduct the traffic study included with the Draft EIR.

As reflected on Page 3.2-19 of the Draft EIR, in order to determine the locations where the proposed project may cause significant transportation impacts, a threshold of significance is required. In addition to measuring the impacts of additional automobiles that will be attracted to transit stations, the analysis addresses the impacts of bus and rail alternatives on intersection traffic signal operations as required in the adopted Congestion Management Program. The threshold of significance used in this environmental report utilizes the Highway Capacity Manual (HCM) operations analysis methodology to quantify existing conditions and future conditions at signalized intersections with and without the proposed transit projects.

An intersection is considered to be significantly affected if the project will cause a deterioration in LOS to E or worse, or results in an increase in the average vehicle delay of 5.0 seconds or more at an intersection projected to operate at LOS E or worse under No Project conditions.

Pursuant to CEQA Section 21002, the Legislature "finds and declares that it is the policy of the state that public agencies should not approve projects as proposed if there are feasible alternatives or feasible mitigation measures available which would substantially lessen the significant environmental effects of such projects." As reflected on Page 3.2-99 through Page 3.2-107 of the Draft EIR, several "feasible" mitigation measures are outlined. CEQA Section 21002 continues by stating that, "The Legislature further finds and declares that in the event specific economic, social, or other conditions make infeasible such project alternatives or such mitigation measures, individual projects may be approved in spite of one or more significant effects thereof." Impacts listed on page 3.2-110 through 3.2-112 will have significant unavoidable impacts since feasible operational measures considered at these intersections would not mitigate all identified impacts to a level of insignificance or less than significant.

CE (1)-6 *"The plans which you and your staff showed to the public at the May and June open houses includes widening of that section of Wilshire Boulevard West of Comstock Avenue to three traffic lanes in each direction, plus the designated busway, while the section East of Comstock shows two traffic lanes in each direction, plus the busway. Wilshire East of Comstock is a heavily congested traffic zone even with the present three lanes in each direction. My concern is that reduction of the number of lanes from three to two creates the potential for a severe bottleneck for Eastbound traffic at Comstock. If this is the case, a driver who encounters this bottleneck will be tempted to avoid the congestion by turning South on Comstock and proceeding through our single family residential area to Santa Monica Boulevard and then East to Beverly Hills. If the backup is severe enough, the diversion of traffic through residential areas could occur on streets significantly West of Comstock including Beverly Glen, Holmby, Westholme, etc. (There is also the possibility of a similar bottleneck in the Westbound direction, depending on the relative width of Wilshire Boulevard further East in Beverly Hills compared to the Santa Monica to Comstock section.)*

Response: The merge from three lanes to two was proposed to occur between Beverly Glen and Devon Avenue and would not have encouraged additional use of Club View Drive. The project will now be implemented as a peak period only curb adjacent bus lane and will not change the basic lane configurations in the vicinity of the Wilshire/Comstock intersection. Thus, no road widening due to this project will occur.

CE (1)-7 *1. Computer simulations studies should be done to assess the impact of this proposed transition to two lanes not only on Wilshire Boulevard traffic but also in residential areas North and South of Wilshire Boulevard, taking into account the projected increase in traffic levels for the next 10 to 50 years. (Bold added.)*

Response: Please refer to Response to Comment CE (1)-6 for a discussion of the configuration of travel lanes under the proposed project.

CE (1)-9 *3. If Wilshire Boulevard cannot be widened to avoid such a bottleneck, consideration should be given to protective traffic mitigation measure on the North boundary of our neighborhood, such as the chokers recommended by the MTA for the South boundary of our neighborhood, which is Santa Monica Boulevard. The simulation studies should include this option for comparison also.*

Response: Refer to Response to Comment CE (1)-4 with regard to the discussion of feasible mitigation measures.

CE (1)-10 *II. I would further suggest to you that, if not already included, you should study the effect of the proposed East West transit improvements on North South traffic. Improved flow on Wilshire Boulevard and on the SMTP may act as a magnet to draw more San Fernando Valley commuter traffic on to Sepulveda Boulevard, the 405 Freeway, Roscomare Road, Beverly Glen Boulevard, Benedict Canyon, etc.*

Response: The north-south roadways mentioned in this comment were included in the travel demand forecasting model for this study. Figures 3.2-14 and 3.2-15 in the Draft EIR illustrate the north-south roadway segments that were impacted by Alternative 1. The proposed project is BRT with peak-hour curb lanes and would have lesser impacts than the original project. Further, it would provide the same level of mitigation as the original project, in terms of contribution toward implementation of ATCS and neighborhood traffic control, as would the 24-hour alternatives studied in the Draft EIR.

CE (1)-16 *Unfortunately, in the Draft EIR, you have chosen to disregard my request for an environmental impact assessment.*

Response: The environmental document for the Mid-City/Westside Transit Corridor Project has been prepared pursuant to the California Environmental Quality Act (CEQA).

CE (1)-18 *I believe that a decision ignoring a professional engineering opinion (especially one contrary to the opinion of the DEIR that the environmental impact is negligible) and not to perform the computer simulations requested, is itself a violation of the CEQA. Therefore, I call upon you to bring the DEIR into compliance with the CEQA before further action is taken by the MTA Board.*

Response: Refer to Response to Comment CE (1)-2 with regard to the use of MTA's Traffic Demand Forecasting Model and Response to Comment CE (1)-4 for a discussion of the requirements of CEQA.

CE (1)-19 *1. The DEIR should not include the Wilshire BRT in all options presented. The Wilshire BRT should stand or fall on its own merits, and not receive favored status by being included in all potential options. Making use of an existing but unused right-of-way (Exposition Boulevard) adds transit capacity without loss of automobile capacity, while the Wilshire BRT reduces automobile capacity to convert presently used right-of-way to bus capacity. Clearly using available but unused right-of-way is superior to converting one kind of capacity to another. This comparison is precluded by the way in which the Wilshire BRT is made a feature of all possible alternatives examined in the DEIR. If presented in an unbiased manner, Wilshire and Exposition can be more clearly be compared and the choice would be obvious.*

Response: In response to MTA Board action, the Exposition ROW project has been designated as a separate project independent of the Wilshire BRT project. Given the levels of future traffic and the declining average speeds estimated in Table 3.2-9 of the Draft EIR, it is likely that both projects are needed to provide the same mobility we have today in the area.

CE (1)-21 *3. The impact of UCLA generated traffic is greatly underestimated. Current 20 year planning by the UC Board of Regents calls for significantly increased student and faculty population and increased parking on the UCLA campus. It also calls for decreased support for free bus commuter options. This will inevitably lead to increased person trips, much of which is North South rather than East West oriented. The North South component is not helped at all by the Wilshire BRT. Students and faculty will still need to commute by automobile in the North South direction. At*

the same time the Wilshire BRT reduces automobile traffic lanes along Wilshire Boulevard between Westwood Boulevard (already the nations busiest intersection) and the major North South arteries, the 405 freeway and Sepulveda Boulevard. This artificially created bottle-neck is a recipe for disaster which is not adequately covered in the DEIR.

Response: The MTA travel demand forecasting model is consistent with regional forecasts for such facilities as UCLA. Please refer to Topical Response B for a discussion of travel lanes along Wilshire Boulevard with the proposed project.

CE (1)-22 4. As admitted in the DEIR, North South traffic in general is at least as serious a problem as East West traffic. This DEIR not only does not address this problem, but does not seriously address the negative impact the Wilshire BRT will create on the existing and growing North South traffic at locations other than those near UCLA as described above. The DEIR does not adequately address the impact the BRT will have on North South canyon traffic such as Mandeville, Beverly Glen, Coldwater, Benedict, Laurel, etc.

Response: Please refer to Response to Comment CE (1)-10 for a discussion of north-south roadways and the travel demand forecasting model. As noted earlier, the proposed project now consists of BRT using peak-hour curb lanes only.

Comment Letter 206: Daniel J. Donohue, June 2001

DAD (1)-2 I join with other residents of the Wilshire Boulevard Corridor (between Comstock and Westwood Boulevards) in emphasizing the fact that speeding buses in exclusive lanes will only add to the congestion of this heavily traveled Boulevard.

Response: The higher speeds in this area are the principal reason why a peak-period-dedicated transit lane is no longer recommended for implementation between Comstock and Selby. Please also refer to Table 3.2-9 of the Draft EIS/EIR, which estimates the future congestion situation for the area.

DAD (1)-4 The negative safety and environmental impact of this proposal on the residents and employees of the Corridor overwhelmingly outweighs its benefits. The time saved by the Rapid buses is minimal yet the hazard the buses present to the health and safety of this community are insurmountably massive. Additionally, the increase in physical danger to both automobile drivers, pedestrians and residents, the noise, the increased, pollution, the traffic upheaval, the inevitable loss of street parking, the impossible delivery conditions, and the inconvenience of a 2-3 year construction project will undoubtedly have an adverse impact on property values in this community. The Wilshire Corridor is one of the most desirable and expensive residential areas in Los Angeles and should not be so negatively impacted by a system destined to fail!

Response: Refer to Response to Comment HL (1)-4 for a discussion of the negative impacts and environmental benefits of the proposed project. The proposed project now consists of curb lane BRT service in the peak-hours rather than the more extensive alternatives previously proposed. No dedicated transit lane is recommended in the residential segments of Westwood.

Comment Letter 210: Dan Levin, June 2001

DAL (1)-6 I also do not want my opposition to this plan to be seen as an endorsement of the bus line plan. All I want is a better plan that will really serve Los Angeles.

Response: Comment noted.

Comment Letter 223: Dawn Westlake

DAW (1)-1 This is earthquake country. Please don't be so foolish as to think you will ever be able to make a subway here! There is a major fault under Wilshire Blvd. Do you ever even meet with seismic scientists?

Response: Please refer to Topical Response D for a discussion of the Major Investment Study preceding this environmental study. The project would consist of restriping and repaving certain segments of the outside curb lane of Wilshire Boulevard to create a flatter driving surface for the BRT. All construction would be at grade. Construction of a subway is not part of the Wilshire BRT project. Also refer to Response to Comment ALW (1)-6.

DAW (1)-2 *Also, please don't ruin our lovely walking neighborhood with noisy buses.*

Response: The results of the noise impact analysis indicate that due to the high existing auto and bus traffic volumes on Wilshire Boulevard, the effect of the proposed additional buses is expected to be less-than-significant. Overall, noise exposure increases of one decibel (dB) or less are expected. Therefore, less-than-significant noise impacts are anticipated for the Wilshire BRT corridor, including the walking areas in the Miracle Mile neighborhood.

DAW (1)-3 *Also, you will have to take away the easy parking on Wilshire and build parking structures.*

Response: The Wilshire BRT will only limit parking during the morning and afternoon peak-hours, when a majority of the parking is currently restricted, and will not affect current business day parking.

Comment Letter 234: Diana Jackson, May 2001

DIJ (1)-2 *I believe this will cause severe traffic cutting through our neighborhood. Motorists will attempt to cut through the area to avoid the increased traffic that will occur on Wilshire Blvd.*

Response: The Draft EIR identified the need to monitor residential streets for potential impacts associated with the diversion of traffic to residential streets due to the prohibition of turning movements with some alternatives. The proposed project will not preclude any current turning movements that would require Wilshire Boulevard traffic to use side streets to complete turns. Longer-distance through trips now on Wilshire Boulevard are forecast to shift to alternate routes due to the loss of a travel lane during peak periods, as shown on Figures 3.2-14 and 3.2-15 (Pages 3.2-51 and 3.2-52 of the Draft EIR). The ATCS signal system improvements to be implemented as a mitigation measure for the proposed project will lessen the impact of this diversion of traffic to a less-than significant-level. The MTA will fund ongoing monitoring as well as neighborhood traffic programs to be implemented by the appropriate jurisdictions. Note that given the traffic volumes forecast to exist without the project, future traffic will divert to residential streets. Thus, by mitigating for the relatively small impacts of peak-hour BRT, the net effect on neighborhoods is positive as compared to the No Project Alternative.

Comment Letter 246: Debby Rotter, June 2001

DR (1)-1 *Providing the most transportation for the dollar should be your first concern.*

Response: The Draft EIR identified that the Wilshire BRT was the most cost-effective improvement to gain the maximum benefit to the community.

Comment Letter 256: Elaine Healy, May 2001

EH (1)-5 *Why not put a light rail along Wilshire Blvd.?*

Response: The MIS process that preceded this environmental study examined a broad range of alternatives. This process screened out alternatives that were determined to not be feasible or that contained other significant flaws that precluded further analysis. The MIS process recommended a series of alternatives for further analysis and these alternatives were carried forward into the environmental review phase. The environmental document discusses the history of this process in Section 2.0. No additional alternatives will be examined as part of this particular process.

EH (1)-6 *Because L.A. is a city so close to the ocean and subways destruct below ground earth layers, subways are not viable.*

Response: The proposed project is a curb lane, peak-hour-only BRT system along Wilshire Boulevard. No subways will be constructed as part of the project.

Comment Letter 268: Elizabeth Roth, June 2001

ER (1)-5 *Miscalculated construction costs bring into question the Annualized Capital and Operation and Maintenance costs per Transit Trip. What is the difference in subsidy to take an existing bus rider from a (lower) subsidized bus and transfer that rider to a (higher) subsidized mode of transportation?*

Response: These costs were determined using a formula that assisted the Federal Transit Administration in the initial evaluation of the project. Also, all forms of transportation (highways, local roads, airports) are heavily publicly subsidized. It is not correct to compare the "Annualized Capital and Operating and Maintenance Cost per Transit Trip with the simple operating costs of a local bus line. The operating costs of Metro Rapid service are very similar to local MTA bus service.

ER (1)-18 *We need an alternative to improve mobility for both transit dependent and automobile users. The use of a Hybrid Electric Rapid Bus should be studied on existing Venice Blvd. (Line 33), Olympic Blvd. (Line 28) and Pico Blvd. (Line 30). Even Santa Monica Blvd. (Line 4) should be considered for Rapid Bus.*

Response: This EIR focuses on transit improvements for the Wilshire Boulevard route. The MTA is also planning additional Metro Rapid Lines serving the Westside on several streets. These include Venice, Pico, and Santa Monica Boulevard.

Comment Letter 283: Florence Verger, May 2001

FV (1)-8 *Increased numbers and use of Metro Rapid buses would be very helpful. They improve all the objectives of public transit: comfort, speed and the ability to move many people.*

Response: There are two basic ways to increase transit capacity: either add more buses to a route or provide bigger buses. In either case, operating speed must either remain constant or increase to result in an increase in transit capacity. The Mid-Cities/Westside corridor project attempts to increase the capacity of Metro Rapid buses on Wilshire Boulevard by moving to larger buses and by maintaining transit operating speed in the face of mounting traffic congestion. Simply adding more buses along the route compromises the ability of the project to take advantage of transit priority at intersections since traffic signal cycles cannot be constantly interrupted without sacrificing north-south traffic flow. Also, adding buses without ensuring at least existing speeds will not improve trip times for users.

FV (1)-9 *Off-bus passes or automatic payment would also speed up buses.*

Response: Reducing the time needed for fare collection is an identified strategy for the Metro Rapid program. The MTA has been exploring different methods for expediting fare payment and is studying options employed by other transit systems, including Smart Cards, fare inspectors, and ticket vending machines.

Comment Letter 293: Ginna Rutter

GIR (1)-5 *I am not convinced that the present busses [sic] operate at capacity and if further need were needed, I'd rather see smaller, not larger public transportation vehicles (Not including subway cars or light rail[sic]).*

Response: Passenger counts taken in the summer of 2001 on the Metro Rapid Route 720 serving Wilshire Boulevard show that about 40,000 people board this route on an average weekday. This is one of the highest numbers of passengers of a single bus route in the MTA's system. As with all transit services, and for that matter

street and freeway facilities, its utilization varies by time of day, direction and specific route segment. For example, in the morning peak-hour (7-8:00 A.M.), the ridership of Route 720 builds up gradually from the east end of the line (Montebello) and attains a maximum load of 1,600 passengers between La Brea and Fairfax, in the westbound direction. To serve this load of passengers, the MTA has had to schedule a bus every three minutes during this period.

Using smaller buses would mean scheduling more frequent service, which would add even more vehicles (and operators) on the street, more maintenance facilities, and would considerably increase operating costs. For instance, with 20-passenger buses, the peak frequency of service would have to double to one bus about every 1.5 minutes. Their operating cost would nearly double, since twice as many drivers and mechanics would be required. Capital costs would also be greater. Small buses are most useful for neighborhood or employer shuttles rather than line haul service.

Comment Letter 296: Gracie F. Karaoke, May 2001

GK (1)-3 This Alternative 3 will also cost $1.0 billion (Wilshire Bus Rapid Transit plus Exposition Light Rail Transit) vs. $654 million for Alternative 2 (Wilshire BRT plus Exposition BRT)—almost twice as much!

Response: Refer to Response to Comment AT (1)-3 for a discussion of a cost comparison between light rail and bus rapid transit. The project, as now proposed, consists of BRT on Wilshire Boulevard operating in the curb lane during peak-hours.

Comment Letter 314: Henry L. Baron, June 2001

HEB (1)-4 I can easily speculate what is going to be the situation when the new buildings under construction and those who will be built spill their resident onto the street. Westwood is a zoo now. How about the future? What [sic] going to happen when busses [sic] come barreling through, and they will, already overburdened traffic.

Response: Buses will be required to observe the posted speed limit.

HEB (1)-6 It is my hope that you will not take the "Don't confuse me with the facts, my mind is made up." If that be the case, I will reluctantly recommend to my fellow residents that they employ legal counsel to protect the users of this already seriously overburdened roadway. It is my belief that this venue will support our position. Surely, there must be a more acceptable alternate route that would be less destructive.

Response: The City of Los Angeles General Plan Framework and its Community Plans recognize Wilshire Boulevard as the primary east-west transportation corridor crossing the basin south of the Santa Monica Mountains. Wilshire Boulevard is designated as a transit priority highway and its corridor contains multiple existing and planned destinations that warrant multiple points of transit access. Therefore, development of transit within the Wilshire Boulevard ROW is consistent with the City of Los Angeles' General Plan and Community Plans (refer to Draft EIR, Page 3.5-15). The Wilshire BRT is also consistent with the LA Congestion Management Program. Please refer also to Topical Response D for a discussion of the Major Investment Study that preceded this environmental document and served to evaluate all reasonable alternatives for addressing transportation problems within the corridor.

Comment Letter 321: Hope Lange, June 2001

HL (1)-2 I join with other residents of the Wilshire Boulevard Corridor (between Comstock and Westwood Boulevards) in emphasizing the fact that speeding buses in exclusive lanes will only add to the congestion of this heavily traveled Boulevard. The installation of a BRT system along Wilshire Boulevard is a dangerous and destructive proposal.

Response: Please note that the MTA is no longer recommending a dedicated transit lane in the segment of Wilshire Boulevard between Comstock and Selby.

HL (1)-4 *The negative safety and environmental impact of this proposal on the residents and employees of the Corridor overwhelmingly outweighs its benefits. The time saved by the Rapid buses is minimal yet the hazard the buses present to the health and safety of this community are insurmountably massive.*

Response: Impacts associated with the Wilshire BRT, such as the loss of left-turn lanes, medians, and on-street parking, were raised by several community groups. These impacts were taken into consideration by the MTA Board, which selected the Locally Preferred Alternative on June 28, 2001. The project now consists of BRT on Wilshire using an exclusive curb lane during peak-hours. The environmental benefits, such as cleaner and larger-capacity vehicles, less overall congestion, and more reliable service to reach destinations, allow more people greater access to origins and destinations along the corridor.

Comment Letter 322: Hideko Mochizuki, May 2001

HM (1)-3 *This Alternative 3 will also cost $1.0 billion (Wilshire Bus Rapid Transit plus Exposition Light Rail Transit) vs. $654 million for Alternative 2 (Wilshire BRT plus Exposition BRT)—almost twice as much!*

Response: The project as now proposed consists of BRT on Wilshire Boulevard operating in the curb lane during peak-hours only and is estimated to cost $232.2 million.

Comment Letter 326: Ishak B. Bawl, May 2001

IB (1)-2 *You are proposing three stops in this area: Santa Monica-Warner-Westwood with no plan, or provision, for the disembarking pedestrians to go to park their cars, or make connections. There is no land available for park/ride facilities at these locations. And there are no north and south connections for transportation.*

Response: The comment notes that there are no park-and-ride lots planned at many stations and that there is limited land available for such facilities. The Wilshire Corridor consists of high density, transit-supportive residential and employment uses, and many MTA riders walk to their destinations. There are north-south transit routes that cross Wilshire Boulevard on all major arterials that will facilitate access to the Wilshire BRT via transit rather than park-and-ride. Please note that no transit stop is proposed at Warner.

IB (1)-4 *We, and the homeowners on the corridor are outraged at your current proposal and the fact that they (or the Homeowner Associations) were not notified of your plans for the Wilshire corridor. BY LAW, when a new building is proposed, the neighbors must be notified by mail, and this project is just as important to our community, and should have included our information in the early stages of this plan.*

Response: Notification of release of the Draft EIR was made to the public in the following manner: sent to more than 250 agencies and organizations; executive summaries of the document were mailed to more than 2,000 individuals on the project mailing list; notifications of availability were distributed to approximately 8,000 people; advertising was placed in 8 newspapers; MTA website offered free download of the Executive Summary and full report; take-one brochures (25,000) were distributed on the MTA Metro Rapid Bus, at bus stops along Wilshire Boulevard, and at Metro Red Line stations at Wilshire/Western and Wilshire/Vermont; and printed copies were provided to the libraries listed in Section 9.13 of the Draft EIR. Pages 9-1 through 9-9 of the Draft EIR show that more than 250 local agencies and organizations were directly mailed the entire Draft EIR, and 88 of these 250 organizations were neighborhood associations, homeowners associations, or Chambers of Commerce.

Comment Letter 328: Ian Cowan

IC (2)-7 *Please consider and take into account 'local impact' on any plan that it [sic] implemented.*

Response: The EIR analyzes both local and broader regional impacts. It includes project modifications and mitigation measures to address many of the concerns expressed by loal businesses and residents.

Comment Letter 331: Irving Geldin, June 2001

IG (1)-2 *I join with other residents of the Wilshire Boulevard Corridor (between Comstock and Westwood Boulevards) in emphasizing the fact that speeding buses in exclusive lanes will only add to the congestion of the heavily traveled Boulevard. The installation of a BRT system along Wilshire Boulevard is a dangerous proposal. The potential decrease in lanes for service vehicles, emergency vehicles, and automobiles to accommodate the exclusive bus lanes will only add to the existing dangerous traffic conditions. There already exists a high frequency of collisions, terrible traffic noise, pollution, and dangerous turn conditions in the corridor. There are many frustrated drivers confronted by bumper-to-bumper traffic. The time saved by the Rapid buses is minimal yet the hazard the buses present to the health and safety of this community are insurmountably massive. The Wilshire Corridor is one of the most desirable and expensive residential areas in Los Angeles and should not be so negatively impacted by a system destined to fail.*

Response: Please refer to Response to Comment WCA (1)-2 regarding posted speed limits for buses. Refer also to Topical Response B for a discussion of the loss of a travel lane during the peak period only. The proposed project, BRT in the curb-lane-only during peak-hours, is intended to reduce traffic impacts by encouraging the use of transit as a viable alternative to the use of an automobile.

Comment Letter 335: Ingeborg Prochazka, June 2001

INP (1)-3 *Most people who own cars will not take buses.*

Response: The proposed project will provide persons with cars an alternative form of transportation. In fact, the Metro Rapid Bus program has attracted ridership from persons with cars by providing enhanced transit service, similar to the service proposed for the Wilshire BRT. Ridership is increased when transit is time-competitive with automobiles.

INP (1)-4 *Also, the Wilshire BRT will create a mess with cross traffic, curbside parking, and left turn lanes.*

Response: The Wilshire BRT peak-period lane is proposed to operate from 7:00 A.M. to 9:00 A.M. and from 4:00 P.M. to 7:00 P.M. in the curb lane. Parking is not allowed along a majority of Wilshire Boulevard during there time periods; therefore, the BRT service would not interfere with parking opportunities. Given the forecasted traffic, it is likely that curbside parking would be removed in the future. Since the service operates in the curb lane, left turns would also be unaffected. Cross traffic would only be slightly affected by the signal priority system proposed for the BRT system. This system would either prolong a green cycle along Wilshire Boulevard for a few seconds or reduce the green cycle for cross streets by a few seconds to allow the BRT vehicle to clear the intersection. The system would not provide an extended green benefit to the BRT vehicle in all situations, and it would have priority over cross traffic. Also, please refer to Section 3.2 of the Draft EIR, which indicates traffic volumes that are anticipated to exist in 2020.

Comment Letter 336: Irwin Pomerantz, July 2001

IP (1)-2 *The Wilshire Boulevard Corridor (between Comstock and Westwood Boulevards) is already adversely impacted by the combination of high volume, excessive speed, dangerous turn conditions, frequency of collisions, accidents, and traffic noise. Speeding buses in exclusive lanes will only add to the congestions woes of this heavy traveled Boulevard.*

Response: A dedicated lane is no longer recommended in the segment of Wilshire Boulevard between Comstock and Selby. Please refer to Response to Comment WCA (1)-2 regarding posted speed limits for buses.

IP (1)-4 *If you were to observe the traffic flow in the westerly direction, you would see that there are daily traffic backups from the 405 Freeway back through the Corridor because of Freeway congestion. Cars are barely moving, bumper-to-bumper, suddenly changing lanes, going into side streets and coming out on Wilshire again, with frustrated*

drivers trying to gain some advantage to reach the Freeway. The amount of air and noise pollution emanating from the stagnant mass of cars and buses is horrendous.

Response: The commenter notes the existing congestion on Wilshire Boulevard in the vicinity of the I-405 Freeway and resultant air and noise pollution. The BRT vehicles are recommended to travel in mixed flow in the immediate vicinity of the I-405 on- and off-ramps to avoid further exacerbating the congestion or causing weaving problems. Designs for this are shown in Volume II of the FEIR. In addition, MTA will make funds available to monitor and mitigate neighborhood traffic problems even though they are not solely caused by BRT. (See Mitigation Measure 3.2-5.)

IP (1)-5 *Any new lanes for express buses would quickly see themselves filled up with these same frustrated drivers and their vehicles to no advantage to the proposed lanes! These buses will just be spewing out their emissions to the high-rise residents as they idle and fight for position in this section of the Boulevard. It is a dream to believe that this proposal will be a solution to population growth.*

Response: The Draft EIR presents an objective analysis of the impacts associated with the different alternatives under consideration. Air quality impacts associated with a BRT system are presented in Section 3.8 of the document, and safety issues related to the proposed project are presented in Section 3.14 of the document. The BRT would maintain speeds on Wilshire for transit vehicles in the peak-hours and would not solve population growth, but would, instead, provide alternative transportation for a growing population. Section 1 of the Draft EIR provides the history on, and purpose and need for the project.

IP (1)-6 *The EIR is astonishingly biased and misleading in its view of the environment and safety impact on the residents and employees of the Corridor.*

Response: The Wilshire BRT buses are fueled by clean-burning compressed natural gas, which do not contribute significantly to air pollution. Wilshire Boulevard is a heavily traveled, congested corridor, and increase in transit service along the corridor is anticipated to have the beneficial impact of reducing overall vehicle trips. Reduced vehicle trips would result in increased safety for pedestrians and motorists traveling the corridor. All potential safety and health impacts of the proposed project were disclosed and analyzed in the Draft EIR.

IP (1)-7 *The potential decrease in vehicle lanes to accommodate the bus lanes will breed an increase in CO emissions as traffic moves slower on balance through an area. Your EIR is negligent in not assuming an increase in pollution in certain pockets of Wilshire Boulevard such as would occur on the Corridor. Your statistics may hold up on average for the entire length of Wilshire Boulevard, but you would certainly adversely impact the pollution circumstances on the Corridor!*

Response: Irwin Pomerante and Associates, LLC comments that the Draft EIR does not assume an increase in CO in certain areas of Wilshire Boulevard. Increases in CO are likely to occur at intersections where an increase in traffic congestion is anticipated as a result of the proposed project. The project traffic consultant analyzed 158 intersections within the transit corridor and projected the increase in vehicular traffic at each of the 158 intersections under project conditions. However, when compared to the No Project Alternative (Table 3.8B-10), the BRT alternative reduces VMT by 22.8 million daily vehicle miles of travel and reduces CO emissions by 84 tons per year. As shown in Table 3.8B-11, none of the intersections will exceed State standards for CO hotspots. Based on the project traffic consultant's analysis, the "CO Hotspot Analysis" in Section 3.8B analyzed CO concentrations at areas within the transportation corridor that are adjacent to the most congested 31 of the 158 study intersections. The selected 31 intersections were designated by the project traffic consultant as being significantly impacted by traffic and would have a level of service (LOS) of F under project conditions. Note that they would also have an even more serious LOS F condition under the No Project Alternative. To help mitigate the LOS F conditions, Pages 3.2-101 through 3.2-103 of the Draft EIR show specific physical intersection improvements as well as signal timing improvements.

IP (1)-8 *One obvious suggestion to improve bus schedules on the Boulevard is to move ALL bus stops to the post-crossing position after intersections, not before intersections as many are situated now.*

Response: Bus stops, where feasible, will be located on the far side of the intersection. There are certain circumstances where driveways and emergency access opportunities require stops to be near-side, or before, the intersection.

IP (1)-9 *In section 3.13, the assumption that there will be a reduction of fuel consumption is questionable when one considers the increased slowdown of vehicles idling in the Corridor because of the Freeway congestion.*

Response: Irwin Pomerantez and Associates, LLC comments that a reduction of fuel consumption (Section 3.13 in the Draft EIR) is questionable because there will be an increase in idling vehicles due to freeway congestion. Section 3.13 of the Draft EIR provides an analysis of the energy impacts associated with the proposed project. The analysis is based on vehicle miles traveled in the area. As indicated in this section, the VMT (Vehicle Miles Traveled) will decrease in the immediate study area along Wilshire Boulevard with the Wilshire BRT alternative and, as such, would result in a reduction in fuel consumption.

IP (1)-10 *In section 3.14, making people walk a number of blocks at night from new off-Wilshire parking locations from a side street location makes security a significant consideration as opposed to the EIR's "less than significant" conclusion.*

Response: Mitigation Measure 3.7-2, which provides that additional station lighting shall be required for the stations along Wilshire Boulevard.

Comment Letter 342: Jan Kidwell, June 2001

JAK (1)-12 *Rail could add more cars with little effect on other traffic, while buses would have to more than double their numbers to handle the increased demand, causing an [sic] significant increase in traffic congestion.*

Response: The commentor suggests that buses would have to double in number to handle forecast demand and that this would cause congestion. The project does not propose additional buses on Wilshire, but instead proposes larger buses to carry more people. An increase in demand can be accommodated without increasing the number of buses.

JAK (1)-21 *Cumulative impacts that proposed Projects in and close to the Westside will have on existing LOS are not addressed in the Mid-City/Westside Transit Corridor Draft EIR. This is a major flaw inasmuch as development now in the proposal stage will result in additional housing units and new businesses. New development will undoubtedly impact peak hour trip time along the east-west corridors for pre-existing commuters. For instance, the FEIR of the Playa Vista First Phase and Master Plan states on page III—42 that the proposed Playa Vista project will "generate approximately 197,010 new trips on a typical weekday" and that 19,690 of these would be during morning peak hours. The City of Los Angeles is the Lead Agency for the proposed Playa Vista Project.*

Response: Cumulative impacts are discussed on Pages 4-1 and 4-2 of the Draft EIR. Page 3.2-50 describes the impact of the BRT project on the person-carrying capacity of the Wilshire Corridor.

JAK (1)-24 *Buses do not attract commuters out of their cars and into public transit unless they feel assured that trip time will decrease. This has historically been found to be the only motivating factor to cause single occupancy vehicle drivers to switch to public transit.*

Response: One component of the project, the peak-hour exclusive lane, is intended to provide the reliable, short or transit trip time for bus passengers that will attract commuters out of their cars. While single occupancy vehicle drivers do, in fact, weigh travel time heavily, other factors, such as economics (e.g., fuel prices and parking

prices), are also are significant considerations. Current ridership success with the BRT concept indicates that bus transit systems induce mode shifts from automobile to transit.

Comment Letter 349: Joanne & Bruce Dorfman, June 2001

JD (1)-3 *We think a wiser plan would incorporate designated bus lanes, and express buses, such as the Alt. 1 proposal, BRT on Wilshire.*

Response: The alternative under consideration is a curb lane, peak-hour-only BRT system along Wilshire Boulevard, which is substantially similar to Alternative 1.

Comment Letter 352: Jean Bushnell, June 2001

JEB (1)-2 *The Metro Rapid bus system on Wilshire is a great success with minimal intrusion into the traffic patterns or traffic overflow into the neighborhoods. Before letting the horse out of the barn, so to speak, let's make sure it's harnessed properly to the carriage it's meant to pull. Once the decision has been implemented to dedicate bus lanes it will be very expensive to repair the damage done. I suggest that the MTA proceed by steps before spending a large portion of their budget on a proposal that is not ultimately workable. I recommend that MTA add more Metro Rapid buses to major streets: Sunset, Santa Monica, Olympic and Pico as well as cross streets such as Beverly Glen, Westwood, Veteran, Sepulveda, etc.*

Response: The improvements associated with the exclusive, bus only lane in the peak hour component of the project primarily consist of striping and signage. The more costly reconfiguration of the Wilshire medians are no longer under consideration. The MTA is proposing to conduct a demonstration segment in cooperation with the City of Los Angeles prior to implementing the full project. In a separate action, the MTA is also planning to expand the Metro Rapid bus service (like the service on Wilshire Boulevard today) to other arterials on the Westside.

Comment Letter 361: Jackie Haskins, May 2001

JH (1)-3 *NOW—You wish to further increase traffic and noise to the community as well as increase safety concerns by the various project alternatives to the Mid-City/Westwood Transit Corridor—and Exposition Blvd. The only viable alternative (I still favor a bicycle path to Santa Monica!) is Alternative I—the Wilshire Bus Rapid Transit (BRT)—Which has shown proven ridership and goes through major destination areas, mostly commercial. Exposition Blvd. does not service high density activity centers, but mostly single family homes.*

Response: The alternative under consideration along Wilshire Boulevard is the curb lane, peak-hour-only BRT system, which is substantially similar to Alternative 1.

Comment Letter 364: Joseph Choueiry

JOSC (1)-2 *Most of the traffic in the morning and evening rush hours is inbound and outbound of the Westside respectively. Therefore it is servicing residents from other areas to commute into the Westside.*

Response: Traffic volumes in the study area are typically heavy in both the east-west and north-south directions during peak-hours, indicating that traffic is not only generated by commuters into the Westside, but by Westside residents as well. The proposed project is intended to serve both groups.

JOSC (1)-4 *The current existing bus system that services almost the entire area of the study does not operate to its full capacity, as mentioned in the report. Therefore, why are more public transportation systems added if the current ones are not overloaded, and they are not anticipated to be.*

Response: Passenger counts taken in the summer of 2001 on the Metro Rapid Route 720 serving Wilshire Boulevard show that about 40,000 people board this route on an average weekday. This is one of the highest numbers of passengers on a single bus route in the MTA's system. As with all transit services, and for that matter street and freeway facilities, its utilization and its service frequencies vary by time of day, direction and specific route segment. For example, in the morning peak-hour (7-8:00 A.M.), the ridership of Route 720 builds up gradually from the east end of the line (Montebello) and attains a maximum load of 1,600 passengers per hour between La Brea and Fairfax, in the westbound direction. To serve this load of passengers, the MTA has had to schedule a bus every three minutes during this period.

JOSC (1)-5 *Should a transit system be needed, Alternative 1 would be the most effective and beneficial of all: It does travel through business corridor. It does not disturb residential areas. It has proven ridership, goes through major destinations.*

Response: The alternative under consideration is a curb lane, peak-hour-only BRT system along Wilshire Boulevard, which is substantially similar to Alternative 1.

JOSC (1)-11 *Please consider spending our tax dollars in a wise and efficient manner.*

Response: Chapter 5 of the DEIS/EIR, Financial Analysis and Comparison of Alternatives, looked at the cost and benefits of different public transportation options, including capital, operating and maintenance costs, financial capability to operate, and cost of improving mobility. More importantly, one of the key objectives for improving mobility within Los Angeles County is to improve the speed of public transportation. It is one of the key factors influencing traveler's mode choice. Quality of life factors, such as impacts on development, air quality, highway congestion, access to the transit-dependent, and the local economy, also were considered.

Comment Letter 378: Joehn Hoag, May 2001

JOH (1)-4 *2. The proposed reduction of lanes from three to two from Comstock to Beverly Hills will most assuredly force traffic onto Club View Drive, which is already heavily congested beyond an acceptable level on account of Century City traffic. This is a major flaw, in any event.*

Response: The merge from three lanes to two was proposed to occur between Beverly Glen and Devon Avenue and would not have encouraged additional use of Club View Drive. The project will now be implemented as a peak period only curb adjacent bus lane and will not change the basic lane configurations in the vicinity of the Wilshire/Comstock intersection.

JOH (1)-5 *It is my understanding that there has been no definitive study of the impact of implementing the proposed busway.*

Response: The Draft EIR evaluates the environmental impacts of this project, including potential mitigation measures and project alternatives. In addition, the Metro Rapid Bus provided MTA with real-time information regarding speed improvements and increased ridership.

JOH (1)-6 *There are numerous assumptions which need to be validated before this proposal is considered further. Foremost among them is that there would be a net reduction in vehicular traffic on account of increased ridership on the new bus route configuration. Further, even if this assumption proves valid, there is still the question of what happens to local traffic which will not be abated by the proposed busway.*

Response: Approximately one-third of the new riders on Metro Rapid are new transit riders, that formerly drove automobiles. This demonstrates that fewer cars are being used than would be the case if Metro Rapid bus service were not provided. Attracting more bus riders will further reduce demand for automobile trips.

JOH (1)-9 *Among other things, the possibility of above/below grade crossings would greatly enhance the efficiency of the busway and alleviate potential congestion.*

Response: The commenter suggests that above/below-grade crossings would enhance the busway. The traffic analysis included in the Draft EIR did not identify the need for grade separations to mitigate the traffic impacts associated with the proposed project. Instead, an improved traffic signal system is proposed which will benefit both transit and auto traffic. The Construction of above- or below-grade crossings would be cost-prohibitive and defeat the purpose of the Wilshire BRT as a low-cost, low-impact solution to the transit system, at the same time maximizing benefits to transit users.

Comment Letter 380: Joan Little, June 2001

JOL (1)-5 *I. The Draft Environmental Impact Report is invalid because it totally ignores the imminent expansion/improvement of Santa Monica Blvd., a parallel, east-west major boulevard less than a mile away, which will undoubtedly affect traffic patterns.*

Response: The Santa Monica Boulevard Transit Parkway Project was included in the travel demand forecasting model, so its effect on traffic volumes and transit ridership is reflected in the future values for each presented in the Draft EIR.

JOL (1)-6 *In addition it is invalid because it does not attempt to realistically estimate the impact of traffic diversion into surrounding residential neighborhoods other than to say it will be "considerable".*

Response: The forecasting of future traffic diversion on residential streets is speculative and very subjective. While it was relatively clear that the prohibition of left turns with Alternative 1 (median running bus lane) would cause drivers to circle blocks to complete such turns, it is less clear how the loss of the curb lane during peak-hours will affect drivers' travel patterns. Some of the longer-distance trips will seek to use alternate parallel arterial streets, as forecast in the MTA travel demand model and the Draft EIR. Some shorter-distance trips could use residential streets, but it is difficult to predict precisely which ones. It is also very difficult to determine how much traffic diversion is caused by this project versus how much will be caused by the forecast 8 to 23 percent peak-hour traffic growth that is anticipated to occur by the year 2020 (Table 3.2-5). For that reason, the proposed project will include a Mitigation Measure 3.2-5 to monitor residential traffic conditions to determine if any residential streets are impacted and the proposed project budget will include funds for neighborhood traffic mitigation. This is a realistic mitigation measure and will benefit neighborhoods that face traffic intrusion with or without the proposed project.

JOL (1)-7 *The planned expansion of Santa Monica Blvd., which is currently in the design stage, has been totally ignored in the Draft Environmental Report. This Santa Monica Blvd. project, which is a huge, $68 million dollar project, will not only change the traffic patterns on Wilshire Blvd. but it will so impact the general Westside traffic patterns as to invalidate the Wilshire BRT study.*

Response: The Santa Monica Boulevard Transit Parkway Project was included in the travel demand forecasting model and was its effects on traffic patterns was therefore addressed in the Draft EIR. The Transit Parkway project's effect on traffic volumes and transit ridership is reflected in the future values for each alternative presented in the Draft EIR.

JOL (1)-8 *Further, the Draft EIR admits that "considerable" amounts of traffic will be diverted from Wilshire Blvd. to arterial and residential streets if a lane of traffic is removed. However, it frankly states that no simulations were made for residential streets and that mitigation efforts should be made after the start of operations when problems are encountered. I do not believe that adequate mitigation methods will always be possible,*

Response: Refer to Response to Comment JOL (1)-6 for a discussion of traffic diversion.

JOL (1)-9 *...and I believe that ignoring the impact upon local residential streets is inconsistent with both the spirit and the letter of the law which provides for an EIR to study the impact on the immediately surrounding area and environment. This has not been done and, therefore, the portion of the Draft EIR for the Wilshire BRT, which involves the removal of a lane of traffic, is not valid under environmental law.*

Response: Refer to Response to Comment JOL (1)-6 for a discussion of traffic diversion.

JOL (1)-10 *II. Placing a BRT on Wilshire Blvd. and removing a traffic lane to do so, has the smallest benefit of all the proposals, but creates the most disruption.*

Response: It is unclear what "proposals" are being referenced in this comment, since all but one of the alternatives other than No Project and TSM entail dedicating a lane on Wilshire Boulevard for bus rapid transit. The Proposed Project consists of a peak-hour, curb lane only BRT along Wilshire Boulevard, with mixed-flow travel in Santa Monica and from Federal to Veteran. There will be no 24-hour removal of a traffic lane on Wilshire Boulevard. This alternative has been determined to be the Locally Preferred Alternative, with the least environmental impacts while at the same time providing maximum benefit for transit users.

JOL (1)-11 *One of the reasons proposed for using Wilshire Blvd. as the main focus of the Westside BRT project is that Wilshire Blvd. currently carries the greatest traffic.*

This is a circular argument. Wilshire Blvd. carries the most traffic because it is one of the few east-west streets that has been designed for that purpose, and the Wilshire corridor has the densest development with little possibility for further growth.

Response: The Purpose and Need for the project (refer to Section 1.3 of the Draft EIR) is based on many factors other than the volume of traffic on Wilshire Boulevard. Key among these are the density of development, number of centers, existing and forecast transit ridership, transit-supportive local and regional policies, and traffic congestion. In particular, the connection of activities centers such as downtown Santa Monica, Westwood, Century City, Beverly Hills, Miracle Mile, Wilshire Center, and downtown Los Angeles was considered of prime importance. Given SCAG's RTP forecasts and the data provided in the MIS for the Proposed Project, the need for transportation improvements in the Wilshire Corridor was demonstrated. Growth continues to be concentrated in the existing centers and there is a finite limit to the physical and operational capacity of the highways and arterials serving them to meet travel demands generated by the centers. Wilshire Boulevard was identified in the MIS as a central corridor highly transit-supporting, consisting of high-density housing, commercial, and retail land uses and was further identified as having significant transit usage. Of the alternatives evaluated, Wilshire BRT has the potential as an interim solution to feed Metro Red Line and serve high volume Wilshire Corridor at a low cost. The Wilshire BRT allows faster speeds than Metro Rapid Bus in the future as congestion grows.

JOL (1)-17 *Further, the DEIR frankly admits that there is no mitigation possible at Wilshire Blvd. and Westwood Blvd., arguably the busiest intersection in the city of Los Angeles. Yet it proposes to remove a lane of traffic, from that busiest intersection, without available mitigation. And at a Community Hearing, it was said that the proposal to remove a lane was to preserve parking for a select few, and remove a full traffic lane for miles with great impact on everyone utilizing Wilshire Blvd? The choice makes no sense if it is true.*

Response: The impact at Wilshire/Westwood was disclosed in the Draft EIR. Parking on Wilshire Boulevard in the vicinity of Westwood Boulevard is already prohibited during peak periods. However, parking will be retained in some of the residential areas of Westwood Boulevard to the east (condominium area), where parking does not occur in the curb travel lane, but rather in pockets of parking where the street has been widened.

JOL (1)-18 *Finally, the Wilshire corridor cannot grow much more. One need only look at it to know that it is fully developed. At a recent MTA meeting, we were told it is the densest development in Los Angeles and approaches the densities seen in San Francisco. So where will the growth in the future go?*

Response: The growth forecasts included in the travel demand model and land use sections of the Draft EIR are consistent with local and regional forecasts for continued infill development in this portion of the region. A major difference between Wilshire Boulevard and Market Street in San Francisco is that San Francisco enjoys a subway (BART), an underground LRT, above-ground buses on one-minute headways, and an above-ground streetcar line in addition to tightly controlled and highly priced parking. These are each incentives for achieving high transit use.

Comment Letter 383: Joyce & Larry Powell, June 2001

JOP (1)-3 *The Wilshire Corridor is one of Los Angeles' finest residential streets. To add to the present heavy traffic, speeding buses in exclusive lanes, is completely unacceptable.*

Response: Buses are required to follow posted speed limits. Furthermore, many of the finest residential streets in the word enjoy frequent transit service in exclusive lanes, including Russian Hill in San Francisco, Fifth Avenue in New York, and Society Hill in Philadelphia.

Comment Letter 391: Judy Page

JP (1)-1 *The issue of school safety and noise was not addressed in the summary as well as the vibrations.*

Response: Noise and vibration impacts were addressed for all sensitive receptors, including schools, on Pages 3.9-1 through 3.9-34 of the Draft EIR. In addition, safety and security impacts were addressed in Section 3.14 of the Draft EIR.

Comment Letter 394:John Ulioth

JU (1)-1 *1.) For the ridiculous cost per mile to (de)construct Wilshire as a bus way, for the inflexible capacity of rapid bus on the most dense existing corridor in L.A. county—(Even if using 100-passenger ARTIC's). Why aren't you considering light rail on Wilshire? I ask you to explain this in the EIR/EIS!*

BRT (at present) *Bus ≈ 60 passengers with standees*

BRT ARTIC *ARTIC Bus ≈ 100+ passengers with standees*

LRV ≈ 600+ passengers. Future expansion limited only by length of stations!

I know the answer—It's because you've made a political decision, not one based on advance transit science, or forward--looking planning.

Response: While Light Rail Transit (LRT) was considered during the Major Investment Study, the Wilshire LRT option could not connect to the Blue Line or future projects. In addition, a light rail yard was needed to service the rail cars. Therefore, the Exposition right-of-way was determined to better serve the corridor.

JU (1)-2 *But why not do this: build Wilshire in BRT—use the center median with minimal invasion into the landscaping the Wilshire merchants adore and build expo in light rail to Santa Monica Pier—not some halfway point, even though Wilshire has the advantage, passenger-wise, initially plot the ridership to the Westside on both lines—for the first year, the second, the third, etc.*

Response: Alternative 1A in the Draft EIR considered a median-adjacent alignment for the BRT. This was not adopted by the Board in June 2001. Alternative 1B was adopted by the Board, which is the curb adjacent option, because it eliminates the impact to the loss of left-turn lanes, landscaping, and medians, and fewer neighborhood impacts.

Comment Letter 434: Loretta Meraj, August 2001

LOM (1)-3 *Wilshire Blvd. is the conduit to the 405 freeway. The traffic is so heavily congested all along the Wilshire Corridor and to the east, eliminating a lane for these few buses seems quite inappropriate.*

Response: The comment states that Wilshire Boulevard traffic levels should preclude dedicating a lane for buses. The project now proposed is a curb lane BRT in the peak-hours on Wilshire Boulevard. As described on pages 3.2-24 through 3.2-25, the Wilshire Corridor now has an 8 percent transit mode share, which is 25 times the regional 3 percent. About 20 percent of the region's home-to-work trips are in the Wilshire Corridor. Both of these facts point to the employment and residential densities in that corridor. In running transit in the future, it will be necessary for the transit vehicles to maintain at least their current average speed and preferably increase their speeds so that the service can be cost-effective, can operate efficiently, and can attract people who now use cars to commute via transit. Table 3.2-9 shows that by 2020, average vehicle speeds will decrease by 23 percent and P.M. peak-hour speeds will decrease to only 20 miles per hour. Page 3.2-32 of the Draft EIR states that county-wide, time spent in traffic (or vehicle hours of travel) will more than double by 2020. The proposed project will allow transit vehicles to operate in the curb lane on Wilshire Boulevard so that transit becomes an attractive alternative to the automobile. The choice of Wilshire Boulevard is one that tries to maximize potential future transit use and traffic impacts are mitigated to the extent feasible by: (1) making physical road improvements (Page 3.2), (2) selecting the curb lane versus the median lane for running of the BRT; (3) installing an ACTS signal system to improve traffic signal timing; (4) monitoring neighborhood traffic impacts and establishing neighborhood traffic controls; and (5) traffic diversion onto parallel corridors is shown to occur and described on Page 3.2-46 and Figure 3.2-11 of the Draft EIR.

The impact of the project on the Santa Monica Freeway will be to increase volumes by 1.25 percent, which is quite small. Also, the freeway will have reached capacity by that time due to ongoing growth. Generally, the road system, both freeway and arterial, will be beyond capacity. Thus, it is imperative that workable alternatives are in place so that basic mobility can be maintained. Section 3.2 of the Draft EIR details traffic impacts of all alternatives and from doing nothing. The Wilshire BRT is the proposed project; what to do with opportunities on the former Exposition streetcar right-of-way is to be studied separately.

LOM (1)-5 *On another aspect [sic]...health. I moved to the Wilshire Corridor from New Beach 10 years ago. The extent of pollution is quite alarming. Glass tables within a day are covered with black dust. Whether from this or not I don't really know but I also contacted lung cancer. Thank G-d it was caught in time. I live a very healthy life and do not smoke. I can only imagine that this pollution that is on my coffee table is also on my lungs.*

Response: Please refer to Section 3.8 of the Draft EIR, which discusses the impacts the proposed Wilshire BRT project would have on air quality. The project would implement the regional air quality plan, and improved public transit would serve to reduce air pollution. Table 3.8B-10 of the Draft EIR shows that VMT is reduced by 2 percent with the BRT project, and tons of carbon monoxide, NO_x and other pollutants are also reduced with the BRT project.

Comment Letter 436: Howard & S. Louise Phanstiel, June 2001

LP (1)-2 *I join with other residents of the Wilshire Boulevard Corridor (between Comstock and Westwood Boulevards) in emphasizing that fact that speeding buses in exclusive lanes will only add to the congestion of this heavily traveled Boulevard. The installation of a BRT system along Wilshire Boulevard is a dangerous and destructive proposal.*

Response: Please refer to Response to Comment WCA (1)-2 regarding posted speed limits for buses.

LP (1)-4 *The negative safety and environmental impact of this proposal on the residents and employees of the Corridor overwhelmingly outweighs its benefits. The times saved by the Rapid buses is minimal yet the hazard the buses present to the health and safety of this community are insurmountably massive.*

Response: Refer to Response to Comment HL (1)-4 for a discussion of the overall environmental benefits of the project.

LP (1)-6 *I understand the Exposition Light Rail system has received overwhelming support from local citizens. I encourage you to consider proceeding with the installation of a Light Rail system along Exposition Boulevard. This is a much more sensible alternative with the potential to genuinely relieve the traffic congestion as the Westside grows without being detrimental to this outstanding Westside residential community. Thank you for your consideration.*

Response: The alternative under consideration along Wilshire Boulevard is the curb lane, peak-hour-only BRT system. As indicated by Table 3.2-17 and Table 3.2-11 of the Draft EIR, the No Action Alternative does not improve traffic operating conditions. Countywide, the hours spent in traffic will more than double while average vehicle speeds would decrease by 23 percent. This project, along with many other transit and non-motorized improvements, will help maintain basic mobility in the Westside of Los Angeles.

Comment Letter 444: Marilyn Blakely, June 2001

MAB (1)-1 *Please do everything in your power to keep Alt. 1. It would be terrible to have the light rail running on Exposition Blvd. We thought it was all settled and further correspondence was unnecessary. However, we are now hearing rumors to the contrary. Again, on our behalf, please support the Expo Detour (Alt. 1).*

Response: The alternative under consideration is a curb lane, peak-hour-only BRT system along Wilshire Boulevard, which is substantially similar to Alternative 1. The Exposition streetcar right-of-way will be studied separately.

Comment Letter 445: Marilyn Blakely

MAB (2)-1 *I am a resident of the West of Westwood HOA and I support Alt. 1.*

Response: The alternative under consideration is a curb lane, peak-hour-only BRT system along Wilshire Boulevard, which is substantially similar to Alternative 1.

Comment Letter 456: Mark Brown, June 2001

MARB (1)-6 *Although I generally support an exclusive treatment for buses along Wilshire, the issues of parking and left turn movements are very important and are very difficult to mitigate in a high-rent, high-traffic corridor. If a BRT project were built along Wilshire, it should be in the curb lane. However, it appears that the curb lane is too narrow to adequately provide the space for a bus without the bus encroaching into the number 2 lane along many segments. Buses already encroach on the next lane in their current operation through Wilshire Center and the Miracle Mile District.*

Response: The proposed project would operate in the curb lane, which is approximately 10'6" wide.

MARB (1)-7 *In order to build political support for an enhanced transit service, such as BRT, it is probably a better approach to begin incrementally. The first step should be to have an exclusive bus lane during peak hours (6-9am and 3-7pm). This would have a minimal impact because parking is already prohibited during peak periods east of the Beverly Hills Triangle.*

Response: The proposed project will be implemented in phases, as suggested by the comment.

MARB (1)-10 *In short, I can't endorse any of the alternatives as presented. I would like to see a more incremental approach to the Wilshire BRT concept so that it can have the greatest potential to gain popular support, which it may not have at this time. The Exposition corridor will not serve the greatest number of riders because there is no significant transit service in that corridor currently. The MTA shouldn't build a rail line or BRT system simply because it has the*

right-of-way to do it if the right-of-way is in the wrong place. However, if an enhanced transit system were to be built there, it should be an LRT system in order to connect to the Blue Line in Downtown Los Angeles.

Response: The Locally Preferred Alternative adopted by the MTA Board is the curb lane Wilshire Bus Rapid Transit alternative in peak hours only if supported and approved by local jurisdictions. This alternative, as discussed in the Executive Summary and Section 2.0 of the Final EIR, will likely be implemented on an incremental basis following demonstration projects. The Exposition Corridor is now being considered separately under another environmental document that will be prepared at the conclusion of preliminary engineering studies for the Exposition Corridor.

Comment Letter 488: Mike Irit Harart, June 2001

MIKH (1)-2 I join with other residents of the Wilshire Boulevard Corridor (between Comstock and Westwood Boulevards) in emphasizing the fact that speeding buses in exclusive lanes will only add to the congestion of this heavily traveled Boulevard. The installation of a BRT system along Wilshire Boulevard is a dangerous and destructive proposal. The potential decrease in lanes for service vehicles, emergency vehicles and automobiles, to accommodate the exclusive bus lanes, will only add to the existing dangerous turn conditions, frequency of collisions, traffic noise, pollution, barely moving bumper-to-bumper traffic and the number of frustrated drivers.

Response: Please refer to Response to Comment WCA (1)- 2 regarding posted speed limits for buses and Topical Response B for a discussion of loss of travel lanes. In addition, the 2020 base column of Table 3.2-9 shows that vehicle speeds will decline to 24.9 miles per hour in 2020.

Comment Letter 494: Mie Koshimoto

MK (1)-9 If we could extend the Red Line through a subway rather than through light rail, we wouldn't have to contend with these above ground issues.

Response: The history of the development of the proposed project along Wilshire Boulevard is discussed on page 4 of the Executive Summary. In particular, this section discusses why the extension of the Metro Red Line is no longer under consideration; which is: 1) the MTA suspended work on extensions due to funding shortfalls; and 2) the Los Angeles County voters passed an initiative prohibiting further use of local sales tax dollars to build subways. Significant portions of the funds necessary to build the subway extension to Pico-San Vicente were anticipated to have come from local sales tax revenues. As a result, the extension of the Metro Red Line is not under consideration.

Comment Letter 496: Mike Metcalfe

MM (1)-1 The DEIS/DEIR should include an alternative which features a LRT system in the EXPO right-of-way and a continuation of improved Bus service on Wilshire without an imposition of the BRT.

Response: The Final EIR examines the Locally Preferred Alternative, which is the Wilshire Bus Rapid Transit Project operating in the curb lane during peak hours only. The Exposition Corridor will be examined in a separate environmental document. The Draft and FINAL EISs/EIRs evaluated an alternative that provided improved bus service. This is discussed in the TSM (Transportation System Management) Alternative. However, the MTA Board adopted the Wilshire BRT system as the preferred alternative.

Comment Letter 511: Nancy Epstein, June 2001

NE (1)-2 I join with other residents of the Wilshire Corridor in emphasizing the fact that speeding buses in exclusive lanes with only add to the congestion of Wilshire Blvd. This proposal is dangerous and destructive. The

negative safety and environmental impact of this proposal on the residents and employees of the Corridor overwhelmingly outweighs its benefits.

Response: Please refer to Response to Comment WCA(1)-2 regarding posted speed limits for buses.

Comment Letter 516: Nadine Watt, June 2001

NW (1)-2 *I join with other residents of the Wilshire Boulevard Corridor (between Comstock and Westwood Boulevards) in emphasizing the fact that speeding buses in exclusive lanes will only add to the congestion of this heavily traveled Boulevard. The installation of a BRT system along Wilshire Boulevard is a dangerous and destructive proposal.*

Response: Please refer to Response to Comment WCA (1)–2 regarding posted speed limits for buses.

NW (1)-4 The negative safety and environmental impact of this proposal on the residents and employees of the Corridor overwhelmingly outweighs its benefits. The time saved by the Rapid buses is minimal yet the hazard the buses present to the health and safety of this community are insurmountably massive.

Response: Refer to Response to Comment HL (1)-4 for a discussion of the environmental benefits of the project.

Comment Letter 517: Oliver Berliner, May 2001

OB (1)-5 I trust that motorists will be able to enter the bus lane in order to make right turns.

Response: The Wilshire BRT is only proposed to be in operation from 7:00 A.M. to 9:00 A.M. and from 4:00 P.M. to 7:00 P.M. During this period, automobiles will be allowed to enter the curb lane to make right turns. At other times, the lane will be used for parking in most segments of the corridor.

Comment Letter 530: Gloria & Peter Gold, June 2001

PG (1)-2 We join with other residents of the Wilshire Boulevard Corridor (between Comstock and Westwood Boulevards) in emphasizing the fact that speeding buses in exclusive lands will only add to the congestion of this heavily traveled Boulevard.

Response: Please refer to Response to Comment WCA (1)-2 regarding posted speed limits for buses.

PG (1)-3: It is unrealistic to believe that the Wilshire BRT will be a solution to traffic congestion on this street as the Westside population grows.

Response: The proposed project is not expected to solve all traffic congestion on Wilshire Boulevard. Rather, it will provide an attractive, reliable, relatively fast alternative to the automobile which will help eliminate some auto traffic.

PG (1)-4 The negative safety and environmental impact of this proposal on the residents and employees of the Corridor overwhelmingly outweighs its benefits.

Response: The Final EIR must clearly identify significant and unavoidable impacts. If the Board approves the project, a Statement of Overriding Considerations/Record of Decision will be prepared explaining the reasons for accepting any significant and unavoidable environmental impacts, and how the impacts will be mitigated to the extent possible.

PG (1)-5 The time saved by the Rapid buses is minimal yet the hazards the buses present to the health and safety of this community are insurmountably massive.

Response: Comment noted. As described in the new Wilshire BRT project description, the Wilshire BRT will only receive a peak hour curbside bus only lane, and will not have a significant safety impact for motorists or

pedestrians. At all other times, the Rapid Bus will continue to run as a mixed flow operation with street traffic. Pedestrians will be permitted to cross Wilshire Boulevard at all of the same locations where they can legally cross today. In addition, adequate pedestrian sight distance will also be maintained at pedestrian crossings of Wilshire Boulevard.

Comment Letter 531: Paul Humphreys & Susan Crozier-Humphreys, June 2001

PH (1)-2 *Alternative proposals can be sorted into two categories. The first is provisional, allowing for temporary relief until a more comprehensive solution is at hand; an example is the Wilshire BRT (Bus Rapid Transit). The second is diversionary, channeling funding that could otherwise be used to rehabilitate the Wilshire Corridor subway project into efforts that are unlikely to attract a broad spectrum of ridership; an example is the proposal for a light-rail transit between Santa Monica and Exposition Park.*

Response: The history of the development of the proposed project along Wilshire Boulevard is discussed on page 4 of the Executive Summary. In particular, this section discusses why the extension of the Metro Red Line is no longer under consideration; which is: 1) the MTA suspended work on extensions due to funding shortfalls; and 2) the Los Angeles County voters passed an initiative prohibiting further use of local sales tax dollars to build subways. Significant portions of the funds necessary to build the subway extension to Pico-San Vicente were anticipated to have come from local sales tax revenues. As a result, the extension of the Metro Red Line is not currently under consideration.

Comment Letter 540: Ronald Anderson, July 2001

RA (1)-2 *The Wilshire Boulevard Corridor (between Comstock and Westwood Boulevards) is already adversely impacted by the combination of high volume, excessive speed, dangerous turn conditions, frequency of collisions, accidents, and traffic noise. Speeding buses in exclusive lanes will only add to the congestion woes of this heavily traveled Boulevard.*

Response: Please refer to Response to Comment WCA (1)-2 regarding posted speed limits for buses. The increased transit opportunities on Wilshire Boulevard, a congested corridor, would be anticipated to have a beneficial impact on safety for pedestrians and motorists through reduced vehicle trips. Enhanced signaling would be optimized for through-travel and the BRT would utilize improved communications to maximize efficiency. The Wilshire BRT would operate in the curb lane during peak hours only, and individual vehicles would be allowed to utilize the bus lane for right turns.

RA (1)-4 *In the afternoon/early evening period, in the westerly direction, there are daily traffic backups from the 405 freeway back through the Corridor because of Freeway congestion. Cars are barley moving, bumper-to-bumper, suddenly changing lanes, going into side streets and coming out on Wilshire again, with frustrated drivers trying to gain some advantage to reach the Freeway. The amount of air and noise pollution emanating from this stagnant mass of cars and buses is horrendous.*

Response: Comment noted. Section 3.08(a) of the DEIS/DEIR addresses air quality impacts associated with the Wilshire BRT. CO concentrations at the intersection of Sepulveda and Wilshire Boulevards would be lower under project conditions when compared to year 2020 No Project conditions. Thus, it is anticipated that the Wilshire BRT would reduce CO concentrations at the Sepulveda/Wilshire intersection and its surrounding area. The commenter is also concerned with noise pollution emanating from the stagnant mass of cars and buses in the area. Generally, vehicular noise increases as vehicular speed increases. Thus, cars moving at slower speeds would not generate more noise than vehicles moving at higher speeds.

RA (1)-5/6 *Any new lanes for express buses would quickly see themselves filled up with these same frustrated drivers and their vehicles to no advantage to the proposed lanes! Policing might help in the first few days but afterward*

there will be no advantage to the bus rider. These buses will just be spewing out their emissions to the high-rise residents as they idle and fight for the position in this section of the Boulevard. It is a dream to believe that this proposal will be a solution to population growth. The EIR is astonishingly biased and misleading in its view of the environmental and safety impact on the residents and employees o f the Corridor.

Response: Air quality impacts associated with a BRT system are presented in Section 3.8 of the document, and safety issues related to the proposed project are presented in Section 3.14 of the document. The BRT would maintain speeds on Wilshire for transit vehicles in the peak-hours and would not solve population growth, but would, instead, provide greater transportation choices for a growing population to reach their destinations. Section 1 of the Draft EIR provides the history, purpose and need for the project. Refer to Topical Response C for a discussion of design options relative to turning prohibitions. This comment is no longer applicable to the proposed project. Furthermore, in certain portions of Wilshire Boulevard, peak-hour speeds are less than 5 mph. A bus lane would allow the transit vehicle to get a consistent and reliable speed through the most congested portions of the corridor. The vehicles will run on either CNG or another clean fuel, which emissions are classified as SULEV—super ultra low-emission vehicle.

RA (1)-7 The potential decrease in vehicle lanes to accommodate the bus lanes will breed an increase in CO emissions as traffic moves slower on balance through the area. Your EIR is negligent in not assuming an increase in pollution in certain pockets of Wilshire Boulevard such as would occur on the Corridor. Your statistics may hold up on average for the entire length of Wilshire Boulevard, but you would certainly adversely impact the pollution circumstances on the Corridor.

Response: Increases in CO are likely to occur at intersections where an increase in traffic congestion is anticipated as a result of the proposed project. The project traffic consultant has analyzed 158 intersections within the transit corridor and projected the increase in vehicular traffic at each of the 158 intersections under project conditions. Based on the project traffic consultant's analysis, the "CO Hotspot Analysis" in Section 3.8B analyzed CO concentrations at areas within the transportation corridor that are adjacent to the most congested 31 of the 158 study intersections. The selected 31 intersections were designated by the project traffic consultant as being significantly impacted by traffic and would have a level of service (LOS) of F under project conditions. LOS is a qualitative description of operating conditions ranging from LOS A, which represents free-flow conditions with little or no vehicular delay, to LOS F, which represents jammed conditions with excessive vehicular delays. Seven of the 31 studied intersections, which have LOS F, are located on Wilshire Boulevard. High CO concentrations are typically found along areas adjacent to congested roadway intersections. Thus, CO concentrations at intersections with an LOS of A, B, C, D, or E would not be as high as the CO concentrations at intersections with an LOS of F. Results of the "CO hotspot analysis" indicate that CO concentrations under future project conditions at the most congested intersections along Wilshire Boulevard would not exceed the State CO standards. Thus, it is also anticipated that less congested intersections on Wilshire Boulevard with an LOS of A, B, C, D, or E would not exceed the State CO standard.

RA (1)-9 In section 3.13, the assumption that there will be a reduction of fuel consumption is questionable when on considers the increased slowdown of vehicles idling in the Corridor because of the Freeway congestion. In section 3.14, making people walk a number of blocks at night from new off-Wilshire parking locations from a side street location makes security a significant consideration as opposed to the EIR's "less than significant" conclusion. Why would you want to destroy the beautiful makeup of this quiet side street community to introduce parking lots?

Response: Irwin Pomerantez and Associates, LLC comments that a reduction of fuel consumption (Section 3.13 in the Draft EIR) is questionable because there will be an increase in idling vehicles due to freeway congestion. Section 3.13 of the Draft EIR provides an analysis of the energy impacts associated with the proposed project. The analysis is based on vehicle miles traveled in the area. As indicated in this section, the VMT will decrease with the Wilshire BRT alternative and, as such, would result in a reduction in fuel consumption. New,

off-street parking lots are no longer recommended for the projects. Two existing parking lots at Crenshaw and La Brea would be upgraded.

Comment Letter 556: Robert L. Leibowitz, May 2001

RL (1)-2 I am extraordinarily concerned that this will obviously drastically increase the amount of travel on this street. There are already far too many accidents along the Wilshire corridor, and I believe adding bus lanes will only worsen the situation.

Response: It is not anticipated that the peak period curb adjacent bus only lane will increase accidents. A lane similar to the proposed project has been implemented on Figueroa Street in downtown Los Angeles without any noticeable increase in accidents or confusion for drivers.

RL (1)-3 Additionally, it will make it more dangerous to try to cross the street.

Response: As described in the new Wilshire BRT project description, the Wilshire BRT will only receive a peak hour curbside bus only lane, and will not have a significant safety impact for motorists or pedestrians. At all other times, the Rapid Bus will continue to run as a mixed flow operation with street traffic. Pedestrians will be permitted to cross Wilshire Boulevard at all of the same locations where they can legally cross today. In addition, adequate pedestrian sight distance will also be maintained at pedestrian crossings of Wilshire Boulevard.

RL (1)-4 The noise pollution would be overwhelming because of the echo pattern that the high-rise buildings cause.

Response: Sound reflections between the high-rise buildings along Wilshire Boulevard have a minimal effect on bus noise levels, resulting in an increase of no more than 1-2 decibels relative to more open locations. Given that the projected bus noise levels in the high-rise areas are 10-15 decibels below the impact threshold, less-than-significant impacts are anticipated due to the proposed additional buses along all areas of the Wilshire Boulevard corridor.

RL (1)-5 The additional pollution from the diesel fuel will certainly worsen the asthmatic condition of my children and myself.

Response: The buses that would be used for the proposed BRT project would use compressed natural gas (CNG), which is a cleaner-burning fuel than diesel. In addition, the overall vehicle miles traveled with this alternative would reduce the consumption of energy, thereby reducing the pollutants generated from vehicle travel.

Comment Letter 557: Roberta Mark, June 2001

RM (1)-2 I join with other residents of the Wilshire Boulevard Corridor (between Comstock And Westwood Boulevards) in emphasizing the fact that speeding buses in exclusive lanes will only add to the congestion of this heavily traveled Boulevard. The installation of a BRT system along Wilshire Boulevard is a dangerous and destructive proposal.

Response: Please refer to Response to Comment WCA (1) –2 regarding posted speed limits for buses.

RM (1)-4 The negative safety and environmental impact of this proposal on the residents and employees of the Corridor overwhelmingly outweighs its benefits. The time saved by the Rapid buses is minimal yet the hazard the buses present to the health and safety of this community are insurmountably massive.

Response: Refer to Response to Comment HL (1)-4 for a discussion of the environmental benefits of the project.

Comment Letter 565: Robert Reyto, July 2001

ROR (1)-6 *In addition, no matter how many buses you add, the cars along the street will not be reduced, and you are just adding unnecessary pollution to our already bad air.*

Response: The buses that would be used for the proposed BRT project would use compressed natural gas (CNG), which is a clean-burning fuel. In addition, the overall vehicle miles traveled with this alternative would reduce the consumption of energy, thereby reducing the pollutants generated from vehicle travel.

ROR (1)-7 *If people in your department would look at the present RTD red buses, you would find that they are not terribly filled, but there are a lot of them. This arrangement seemed to have helped a few, but forgot about the majority. There seem to be very few of the old standard buses, and they are the ones that serve the riding population.*

Response: Passenger counts taken in the summer of 2001 on the Metro Rapid Route 720 serving Wilshire Boulevard show that about 40,000 people board this route on an average weekday. This is one of the highest numbers of passengers of a single bus route in the MTA's system. As with all transit services, and for that matter street and freeway facilities, its utilization varies by time of day, direction and specific route segment. For example, in the morning peak-hour (7-8:00 A.M.), the ridership of Route 720 builds up gradually from the east end of the line (Montebello) and attains a maximum load of 1,600 passengers between La Brea and Fairfax, in the westbound direction. To serve this load of passengers, the MTA has had to schedule a bus every three minutes during this period.

Based on "ride checks" confirming the numbers of riders at given observation points, some local bus service was re-assigned to rapid bus in order to more closely match demands between the two types of services.

Comment Letter 567: Robert W. Wiviott, June 2001

ROW (1)-2 *I join with other residents of the Wilshire Boulevard Corridor (between Comstock and Westwood Boulevards) in emphasizing the fact that speeding buses in exclusive lanes will only add to the congestion of this heavily traveled Boulevard. The installation of a BRT system along Wilshire Boulevard is a dangerous and destructive proposal.*

Response: Please refer to Response to Comment WCA (1)–2 regarding posted speed limits for buses.

ROW (1)-4 *The negative safety and environmental impact of this proposal on the residents and employees of the Corridor overwhelmingly outweighs its benefits. The time saved by the Rapid buses is minimal yet the hazard the buses present to the health and safety of this community are insurmountably massive.*

Response: Refer to Response to Comment HL (1)-4 for a discussion of the environmental benefits of the project.

Comment Letter 571: Roger A. Papet, June 2001

RP (1)-2 *Extension of the subway to the Westside is the best solution, but for now that is not being considered.*

Response: The history of the development of the proposed project along Wilshire Boulevard is discussed on page 4 of the Executive Summary. This section discusses why the extension of the Metro Red Line is no longer under consideration; which is: 1) the MTA suspended work on extensions due to funding shortfalls; and 2) the Los Angeles County voters passed an initiative prohibiting further use of local sales tax dollars to building subways. Significant portions of the funds necessary to build the subway extension to Pico-San Vicente were anticipated to have come from local sales tax revenues. As a result, the extension of the Metro Red Line is not currently under consideration.

Comment Letter 593: Shirley and Isadore Familian, May 2001

SHF (1)-2 *It is an unsafe idea which will cause more accidents, cause serious grid-lock, and raise our noise and distress level.*

Response: As described in the new Wilshire BRT project description, the Wilshire BRT will only receive a peak hour curbside bus only lane, and will not have a significant safety impact for motorists or pedestrians. At all other times, the Rapid Bus will continue to run as a mixed flow operation with street traffic. Pedestrians will be permitted to cross Wilshire Boulevard at all of the same locations where they can legally cross today. In addition, adequate pedestrian sight distance will also be maintained at pedestrian crossings of Wilshire Boulevard.

Comment Letter 599: Stella Kishim, May 2001

SK (1)-3 *This Alternative 3 will also cost $1.0 billion (Wilshire Bus Rapid Transit plus Exposition Light Rail Transit) vs. $654 million for Alternative 2 (Wilshire BRT plus Exposition BRT)—almost twice as much!*

Response: Refer to Response to Comment AT (1)-3 for a discussion of cost comparisons between light rail and bus rapid transit.

Comment Letter 601: Sandra J. Levin, June 2001

SL (1)-74 *Essentially, this section does not analyze construction impacts and merely refers the reader to a variety of other section (3.18-11) with no specifics or even page references. Some of the referenced sections do not appear to include construction analysis (e.g., section 3.4). Others are inadequate (see discussion of section 3.9 above). Others that do contain construction impact analysis are not mentioned (e.g., section 3.5 re land use and neighborhood compatibility).*

Response: The alternative under consideration is the curb-lane, peak-hour only BRT system along Wilshire Boulevard. Construction associated with the proposed project consists of reconstructing the outside curb lane to remove the dips and cross street crowns over 4 miles between Western and San Vicente, as well as the construction of at-grade station platforms. Specific impacts that are associated with the construction of the BRT system along Wilshire Boulevard would be addressed in the Final EIR. Construction Mitigation Plan in Appendix D of the FEIR.

Comment Letter 618: Sue Swartz

SUS (1)-3 *A new building is going up for County Offices on Sepulveda and Pico and this will also generate much more traffic.*

Response: The employment represented by the new building referenced at Pico and Sepulveda is included in the socioeconomic data, which are inputs to the travel demand forecasting model used to prepare the background traffic forecasts in this Draft EIR, so the traffic it will generate has been reflected in the analysis of the alternatives.

Comment Letter 621: Sylvia M. Heller, June 2001

SYH (1)-2 *I join with other residents of the Wilshire Boulevard corridor (between Comstock and Westwood Boulevards) in emphasizing the fact that speeding buses in exclusive lanes will only add to the congestion of this heavily traveled Boulevard. The installation of a BRT system along Wilshire Boulevard is a dangerous and destructive proposal.*

Response: Please refer to Response to Comment WCA (1)–2 regarding posted speed limits for buses.

SYH (1)-4 *The negative safety and environmental impact of this proposal on the residents and employees of the Corridor overwhelmingly outweighs its benefits. The time saved by the Rapid buses is minimal yet the hazard the buses present to the health and safety of this community are insurmountably massive.*

Response: Refer to Response to Comment HL (1)-4 for a discussion of the environmental benefits of the project.

Comment Letter 627: Tehereh Hirmand, June 2001

TH (1)-2 *In my belief, the distance between the intersection of Wilshire Boulevard and Santa Monica Boulevard to the intersection of Wilshire Boulevard and Westwood Boulevard is more than two miles, but there is not a BRT stop station. Specially [sic] there is not sidewalk in most part of the north side of Wilshire Boulevard.*

Response: In the initial design of the Metro Rapid, a Beverly Glen station was identified and was not provided due to the historically low ridership and the opposition of the neighboring residents.

TH (1)-3 *So it is necessary to have one BRT stop station at the intersection of Wilshire Blvd and Westholm St. or at the intersection of Wilshire Blvd and Warner Street. That is exactly in the middle of the two above. Our residents need having one BRT stop station there.*

Response: A stop at Warner was initially proposed by the consultant team, but subsequently rejected by the community.

Comment Letter 628: Tehereh Hirmand, June 2001

TH (2)-5 *You are proposing three stops in this area: Santa Monica-Warner-Westwood with no plan, or provision, for the disembarking pedestrians to go to park their cars, or make connections. There is no land available for park/ride facilities at these locations. And there are no north and south connections for transportation.*

Response: Please refer to Response to Comment IB (1)-2 for a discussion of transit stops.

THR (1)-3 *In addition to those alternatives, such as a Busway/High Occupancy Vehicle/High Occupancy Toll lane couplet on the Santa Monica (I-10) Freeway, that have obvious transportation merit, MTA has failed in its affirmative responsibility to compare the "Build Alternative" to a Transportation System Management (TSM) Alternative that is the "best that can be done to improve mobility in the corridor without the construction of major new transit facilities."*

Response: The environmental analysis of the Draft EIR (Sections 3.1 to 3.17) discusses the Transportation Systems Management (TSM) Alternative in comparison to the No Build Alternative, as well as the proposed Wilshire BRT project.

THR (1)-6 *As this report will be part of a Federal "new starts" grant application, MTA is required to study the Transportation System Management (TSM) Alternative. MTA has not properly satisfied the TSM requirements.*

Response: The Transportation Systems Management (TSM) Alternative is discussed in the environmental analysis of the Draft EIR (Sections 3.1 to 3.17). Additionally, the Federal Transit Administration (FTA) has been, and will continue to be, involved in the development of the proposed project and will determine the adequacy of all components, per FTA guidelines.

THR (1)-7 *The FTA's Technical Guidance on Section 5309 new Starts Criteria ("Technical Guidance"), July 1999 requires a minimum of three alternatives in most circumstances, including this one (§4.2.2., page 31):*

"Many of the New Starts criteria require comparisons between the proposed New Starts project and two baseline alternatives, a No Build alternative and a TSM alternative. The baseline alternatives are designed in such a way as to distill the transit benefits of each proposed New Starts investment. While the appropriate new Starts project

and baseline alternatives in each corridor will depend on local circumstances, a consistent approach must be followed in defining these alternatives.

"Project sponsors should recognize that they will need to generate information on the No Build and TSM alternatives during the Preliminary Engineering (PE) and Final Design phases. Although these baseline alternatives may no longer be real options for local decision-making purposes, they will serve as essential baselines for computing FTA'S project evaluation measures."

Response: All the alternatives are discussed in Section 2.0 (Alternative Considered) of the Draft EIR, which includes the No Build, Transportation Systems Management (TSM), and the Wilshire BRT alternatives. Impacts associated with the No Build, TSM and Wilshire BRT alternatives are also discussed in the Draft EIR. Furthermore, the Federal Transit Administration (FTA) has been and will continue to be involved in the development of the proposed project and will determine the adequacy of all components, per FTA guidelines.

THR (1)-8 Technical Guidance describes the Transportation System Management (TSM) alternative as a "second baseline case." TSM is defined as (Id., §4.3.1.2, page 36):

> *"[T]he No Build Alternative plus lower cost transportation improvements (i.e., lower cost than the Build Alternative) which represent the best that can be done to improve mobility in the corridor without the construction of major new transit facilities." (Emphasis added.) (See also id. At page 32 §4.2.2.2., page 32.) Inside the corridor, the TSM alternative analyzed "should offer approximately the same level of transit service (coverage, route spacing, peak and off-peak headways, etc.) as the Build Alternative of the Project, as defined below."*

Response: The Transportation Systems Management (TSM) Alternative has been defined to specifically reflect the level of transit improvement that the MTA can reasonably be expected to undertake in the next 20 years. This alternative is built on expanding the existing bus rapid system and bus fleet. The TSM Alternative meets the requirement of the consent decree.

THR (1)-9 Analysis of both a "No Build" alternative and a TSM alternative, as well as analysis of the Project ("Build Alternative") is required in New Starts and related funding requests 1.

Response: The analyses of the No Build, TSM, and the Wilshire BRT alternatives are provided in the Draft EIR. Additionally, the Federal Transit Administration (FTA) has been, and will continue to be, involved in the development of this project and will determine the adequacy of all components, per FTA guidelines.

THR (1)-11 I believe that what is laid out about as the TSM alternative is actually far from even a minimum program that could begin to be considered as "best that can be done to improve mobility in the corridor without the construction of major new transit facilities"-the Federal standard for the TSM alternative.

Response: The Transportation Systems Management (TSM) Alternative has been defined to specifically reflect the level of transit improvement that the MTA can reasonably be expected to undertake in the next 20 years. This alternative is built on expanding the existing bus rapid system and bus fleet. The TSM Alternative meets the requirement of the consent decree. Furthermore, the Federal Transit Administration (FTA) has been and will continue to be involved in the development of the proposed project and will determine the adequacy of all components, per FTA guidelines.

THR (1)-14 [1. The existing Rapid Bus Line 720 on Wilshire/Whittier has been, without any doubt what-soever, the outstanding accomplishment of MTA since its inception, as documented in LRTP (pp. 2-29/48).] However, further improvements to the operation of this line, beyond those discussed in the Baseline and TSM alternatives, have a significant likelihood of increasing ridership even further at very low cost. Specifically, Line 720 has been operating under a capacity limitation since the day it started service. As has been shown by the success of the Consent Decree (CD) that resulted from Labor/Community Strategy Center v. MTA (L/CSC v. MTA), an increase in the capacity of MTA bus lines results in increases in transit ridership.

Response: The TSM definition does, in fact, try to maximize current rapid bus operations. Because LADOT transit priority cannot interrupt consecutive traffic cycles (to allow north-south traffic to recover), there is a limit to the frequency that rapid bus can operate while still taking advantage of the transit priority. Therefore, the TSM maximizes that frequency and moves to bigger buses in order to provide greater transit capacity.

THR (1)-15 Also, while Line 720 currently uses traffic signal preference as one of the main components in the increase in vehicle speed (along with limited stop service), at the current time, this preference is limited to the City of Los Angeles alone. If similar signal preference were to be introduced in the Cities of Beverly Hills and Santa Monica and the unincorporated areas of Los Angeles County along the route (all of which are within the Study Corridor) and East of the Study Corridor all the way to Montebello, there would be an additional increase in vehicle speed that would both make this line more attractive to additional new riders, including many riders who begin or end their trips within the study area, and decrease its costs of operation even further[3].

Response: The MTA continues to have discussions with the cities of Beverly Hills and Santa Monica regarding traffic signal preference for the Metro Rapid Buses.

THR (1)-18 The costs of many, if not all, of such options are well within the limitations of the TSM alternative definition.

Response: The project will build on the existing system and will be enhanced with more options not currently available to the TSM alternative.

THR (1)-20 2. Expansion of the MTA Rapid Bus program, as proposed by MTA itself and documented in the LRTP. On page 2-47, we see no less than twenty-two additional proposed Rapid Bus lines, to be implemented in three phases over the next few years. Several of these lines operate in or through the study corridor. This does not even consider other existing and potential alignments for additional Rapid Bus routes.

It is absolutely incomprehensible how the TSM for this study could not include these Rapid Bus improvements. In addition to simply including these lines in the TSM option, the types of further improvements and enhancements discussed in the preceding section should also be applied, in many cases, to the Rapid Bus lines in the LRTP. Given that Rapid Bus has been demonstrated as being extremely successful in exactly this corridor, and that MTA itself has clearly indicated that it expects to be quickly implementing many lines in the study area, not including them in this study is, without any question, wrong and indefensible.

Response: The project will build on the existing system and will be enhanced with more options not currently available to the TSM alternative.

THR (1)-21 There is a very simple, and well proven way to increase transit ridership at a very low cost per new riders: Lower the fares.

Response: MTA can consider changes in fare structure at any time and independently of the EIR. Fare reduction proposals are not necessarily ineffective means of increasing new transit ridership and reducing congestion. Much of the ridership growth from fare reductions is the result of existing riders using the system more frequently. More importantly, the cost increases associated with this type of proposal are almost all operating costs. The MTA has limited operating funds. Most of the costs associated with the corridor project are capital costs. The MTA has received new capital funding for this project, which cannot be used for operating costs.

THR (1)-22 When the Southern California Rapid Transit District (SCRTD) lowered its cash fare from 85¢ to 50¢ at the beginning of its 1983 fiscal years, and kept it there for three years, SCRTD unlinked trips increased over 40%, with morning and afternoon peak ridership up 42% and 38% respectively. The cost of this fare reduction was less than 20% of the .5% Proposition A Transit Salves [sic] Tax (less than a .1 cent [sic] sales tax).

Response: Refer to Response to Comment THR (1)-21 for a discussion of fare reduction options.

THR (1)-23 As I demonstrated in Lower Fares for the Los Angeles County Metropolitan Transportation Authority—A Proposal from The Environmental Defense Fund, The Natural Resources Defense Council, the Coalition for Clean Air, the Asian Pacific American Legal Center of Southern California, and Communities for a Better Environmets[3] the subsidy per new passenger for ridership increases through fare reductions would be in the low $2.00 per passenger range, with most of this increased subsidy due to the costs to operate additional bus service within the load factor requirements of the CD. There is no option available to MTA has came remotely close to this extremely low taxpayer funding requirement while producing such huge ridership increases.

Response: Refer to Response to Comment THR (1)-21 for a discussion of fare reduction options.

THR (1)-28 Of course, while the overstatement of total ridership is very important, the key quantitative decision criteria is cost per new passenger. Because new passengers are only a small portion of total passengers, the overstatement of new trips by such an erroneous process is likely to be far more than the overstatement of total ridership.

Response: Because this comment is related to rail ridership, it does not apply to the Wilshire BRT project, which was modeled in a bus mode. For the Wilshire BRT project, actual bus boardings on the Metro Rapis Bus have been used as a basis for the forecasts. Actual increases of 25% have been measured, indicating that forecasts of ridership growth are reasonable.

THR (1)-32 Was a "modal preference" assumption made? In other words, was there a logic rule that, in simple terms, states, that all else equal, more people will decide to take a trip on LRT than on BRT? If this is the case, what are the exact details of the difference between the propensities to use BRT and LRT—especially as Line720 has conclusively exhibited that Rapid Bus, a step below BRT, is widely popular in this Corridor?

Response: The author's arguments were based on knowledge of an older version model. The current MTA model has been re-structured and inconsistent treatment among modes were removed substantially. The following response first describes the structure of MTA model in general then addresses Mr. Rubin's three comments in specific. The MTA mode choice model is a nested logit model. Its transit portion contains five submodes (e.g., local bus, express bus, transitway bus, urban rail, and Metrolink). Mode specific constants (MSC) were specified to measure the importance of subjective and often unquantifiable attributes (e.g., convenience, comfort, and reliability) associated with each of the five modes. These MSC's were calibrated based on origin-destination surveys and on-board bus and rail surveys conducted in 1997-1998. When modeling the New Start project using rapid bus technology, the proposed service was assumed to be a local bus line.

THR (1)-33 Were there other differences in the assumptions between LRT and BRT? For examples, in the assumptions used for the 1995 LRTP, the experts working for the plaintiffs in L/CSC v. MTA discovered that the bus "walk distance"—the maximum distance that potential transit rides would walk to a bus stop—was one-quarter mile, but the rail walk distance was a full mile. This effectively made the geographic walk distance circle around a rail station sixteen times the comparable circle for a bus stop. There were additional assumptions in which bus and rail were treated differently.

Response: This is because the image of rapid bus technology, being unable to enjoy exclusive right-of-way on local arterial streets, is considered most similar to a local bus service. When coding a rapid bus service, the speed of rapid bus is assumed to be faster than the local buses in the same vicinity by approximately 15%, due to signal preemptions and longer spacing of bus stops.

THR (1)-34 What are the reasons, in the evaluation of the people who prepared the model runs, that LRT produces so much higher ridership than BRT in this corridor?

Response: When modeling the New Start project using the BRT technology, it was modeled as a component within the express bus category (except its running speed was enhanced to reflect the advantage of exclusive right-of-way operation). It was felt that the image of BRT would be between an express bus and a transitway bus.

However, since the latter was used to represent the extremely fast and premium bus service on freeways, and since the BRT in the East-West Corridor will not to achieve the 70-MPH running speed as on the El Monte Busway and Harbor Transitway, it was determined to model BRT service as express bus. The following is to answer the three specific comments (inquiries). First, there is no "modal preference" assumption made in the modeling process. The set of modal constants (MSC's) was calibrated based on the 1998 service attributes as well as observed market shares. No arbitrary assumption was made to the development of MSC's. Second, unlike the older MTA model, the maximum walk distances to/from rail, transitway, and express bus stations are treated equally at 0.6 miles. Consistent access/egress assumptions were made among all transit modes. The model does not contain any preferential treatment for rail mode. Thirdly, since the Final EIR removes any alternative modeled in a rail mode, this comment is no longer applicable. The set of modal constants (MSC's) was calibrated based on the 1998 service attributes as well as observed market shares. No arbitrary assumption was made to the development of MSC's. Maximum walk distances to/from rail, transitway, and express bus stations are treated equally at 0.6 miles. Consistent access/egress assumptions were made among all transit modes. The model does not contain any preferential treatment for rail mode.

THR (1)-42 I am unable to determine form [sic] the data in the Draft EIR what speed advantage of BRT in then Wilshire corridor, compared to the existing Rapid Bus, is expected to be, and the elements of the speed advantage. From my own analysis, I am unable to determine much reason to expect a change, other than factors such as gaining traffic signal preference in the non-City of Los Angeles areas of the alignment, an advantage that is hardly unique to BRT. In short, how many minutes will full BRT save from Wilshire/Western to Santa Monica over Rapid Bus, and what are the details? Let us see how many minutes of time savings—our tax dollars are paying for.

Response: The travel time savings estimated for the full BRT option discussed in the Draft EIR is about 14 minutes compared to Rapid Bus. The full BRT travel time estimate is based on buses being able to proceed from stop to stop without delays caused by friction from mixed traffic (a condition not enjoyed by the Metro Rapid route on Wilshire today).

The Draft EIR's travel time estimate assumes partial preemption at major intersections (similar to what LADOT currently is granting Metro Rapid) throughout the length of the BRT route. As noted, traffic signal preference does not necessarily only apply to a BRT project, though an investment in an exclusive BRT lane would suggest a greater commitment to maximize its use by providing the most traffic signal preference as allowable.

Comment Letter 646: Unreadable

UNREAD (7)-3 This Alternative 3 will also cost $1.0 billion (Wilshire Bus Rapid Transit plus Exposition Light Rail Transit) vs. $654 million for Alternative 2 (Wilshire BRT plus Exposition BRT)—almost twice as much!

Response: Refer to Response to Comment AT (1)-3 for a discussion of a cost comparison between light rail and bus rapid transit.

Comment Letter 653: Unreadable

UNREAD (14)-3 This Alternative 3 will also cost $1.0 billion (Wilshire Bus Rapid Transit plus Exposition Light Rail Transit) vs. $654 million for Alternative 2 (Wilshire BRT plus Exposition BRT)—almost twice as much!

Response: Refer to Response to Comment AT (1)-3 for a discussion of a cost comparison between light rail and bus rapid transit.

Comment Letter 654: Unreadable

UNREAD (15)-3 This Alternative 3 will also cost $1.0 billion (Wilshire Bus Rapid Transit plus Exposition Light Rail Transit) vs. $654 million for Alternative 2 (Wilshire BRT plus Exposition BRT)—almost twice as much!

Response: Refer to Response to Comment AT (1)-3 for a discussion of a cost comparison between light rail and bus rapid transit.

Comment Letter 655: Unreadable

UNREAD (16)-3 This Alternative 3 will also cost $1.0 billion (Wilshire Bus Rapid Transit plus Exposition Light Rail Transit) vs. $354 million for Alternative 2 (Wilshire BRT plus Exposition BRT)—almost twice as much!

Response: Refer to Response to Comment AT (1)-3 for a discussion of a cost comparison between light rail and bus rapid transit.

Comment Letter 661: Unreadable

UNREAD (22)-4 The negative safety and environmental impact of this proposal on the residents and employees of the Corridor overwhelmingly outweighs its benefits. The time saved by the Rapid buses is minimal yet, the hazard the buses present to the health and safety of this community are insurmountably massive.

Response: Refer to Response to Comment HL (1)-4 for a discussion of the environmental benefits of the project.

Comment Letter 664: Unreadable

UNREAD (25)-4 Send the busses [sic] to Olympic, Santa Monica and Pico, which is commercial, and provide north and south connection to transportation.

Response: Any of these corridors (including Wilshire Boulevard) provide key connections to north-south transportation.

Comment Letter 665: Unreadable

UNREAD (26)-3 I support increased bus service wherever possible–especially for student transport to H.S. & Middle school sites.

Response: The Wilshire BRT project attempts to address overcrowded buses on Wilshire Boulevard by the use of more and larger buses.

UNREAD (26)-4 Buses are overcrowded! Demand is there.

Response: The Wilshire BRT project attempts to address overcrowded buses on Wilshire Boulevard by the use of more and larger buses.

Comment Letter 667: Unreadable

UNREAD (28)-1 I believe there is an erroneous projection of your figures of 300,000 people and 200,000 jobs in next 20 years relating to bus usage.

Response: As described in Chapter 1 on Table 1-3 of the Draft EIR (Population and Employment Forecast), MTA has used the Southern California Association of Governments' population and employment projection data, not ridership numbers. As our Metropolitan Planning Organization, SCAG data are used for MTA modeling purposes.

UNREAD (28)-2 Most of the people using bus service are service people and gain in bus usage in proportion is relatively small.

Response: Ridership is discussed in Chapter 5, Section 5.2.1, of the Draft EIR.

UNREAD (28)-3 The problem which should be addressed is the additional cars in the area. Creating bus lines and reducing lanes for auto is not the solution.

Response: Refer to Response to Comment HL (1)-4 for a discussion of the environmental benefits of the project. In addition, as travel speeds are predicted to slow down in the future, this will provider interim transportation choices to the community. We agree one line will not ease congestion, but will be part of a growing grid network.

Comment Letter 669: Unreadable

UNREAD (30)-3 This Alternative 3 will also cost $1.0 billion (Wilshire Bus Rapid transit plus Exposition Light Rail Transit) vs. $654 million for Alternative 2 (Wilshire BRT plus Exposition BRT)—almost twice as much!

Response: Refer to Response to Comment AT (1)-3 for a discussion of cost comparisons between light rail and bus rapid transit.

Comment Letter 672: Unreadable

UNREAD (33)-3 This Alternative 3 will also cost $1.0 billion (Wilshire Bus Rapid Transit plus Exposition Light Rail Transit) vs. $654 million for Alternative 2 (Wilshire BRT plus Exposition BRT)—almost twice as much!

Response: Refer to Response to Comment AT (1)-3 for a discussion of cost comparisons between light rail and bus rapid transit.

Comment Letter 696: William Brooks, June 2001

WB (1)-3 Additionally, we understand that the dedicated lane will only run to San Vicente Blvd as the city of Beverly Hills will not allow the dedicated lane to run through their community. This, too seems to be a poor solution.

Response: As described in the Introduction to Section 11 of the Final EIR, the proposed project would be implemented in phases. First, a demonstration project, consisting of peak period lanes for the A.M. peak-hour, will be implemented in two segments along the Corridor. Following successful demonstration of the in-street segments and concurrence of the affected city and county jurisdictions, a peak-hour dedicated transit lane will be implemented. Therefore, while there will be no dedicated lanes along the Corridor, peak period lanes could extend through Beverly Hills with the City's concurrence.

Comment Letter 702: Walter Oppenheimer, June 2001

WO (1)-2 I join with other residents of the Wilshire Boulevard Corridor (between Comstock and Westwood Boulevards) in emphasizing the fact that speeding buses in exclusive lanes will only add to the congestion of this heavily traveled Boulevard. The installation of a BRT system along Wilshire Boulevard is a dangerous and destructive proposal.

Response: Please refer to Response to Comment WCA (1)-2 regarding posted speed limits for buses.

WO (1)-4 The negative safety and environmental impact of this proposal on the residents and employees of the Corridor overwhelmingly outweighs its benefits. The time saved by the Rapid buses is minimal yet the hazard the buses present to the health and safety of this community are insurmountably massive.

Response: Refer to Response to Comment HL (1)-4 for a discussion of the environmental benefits of the project.

9.6.3 Public Testimony

Public Testimony, Monday, May 7, 2001

T (1)-45 *First of all, I'd like to point out that after the earthquake they were able to repair the bridge in a matter of a hundred days. I don't know why it's going to take three years to complete this project. I think it could be done a lot faster than that.*

Response: The time required to complete the Wilshire BRT depends on factors such as the manufacture of new higher-capacity vehicles and a newly constructed bus maintenance facility and almost four miles of lane reconstruction, which will take approximately three years.

T (1)-95 *And I understand that we have a problem here. We have a full-funded grant agreement with our friends in Washington D.C., and it's a very complicated thing about how you can spend the money, etc., and it's sort of driving the whole process. But it seems to me that we shouldn't be driven totally by that, because I just don't see right now on Wilshire doing a 24-hour facility. I think it doesn't call for that. The Rapid buses after 9:00 p.m., zip down no faster than the local buses, because it's really not the same traffic problem.*

Response: Chapter 5 of the Draft EIR, Financial Analysis and Comparison of Alternatives, looked at the cost and benefits of different public transportation options such as capital, operating, and maintenance costs, financial capacity to operate, and cost of improving mobility. More importantly, one of the key objectives for improving mobility within Los Angeles County is to improve the speed of public transportation. It is one of the key factors influencing travelers' modal selection. Quality of life factors such as impacts on development, air quality, highway congestion, and the local economy also need to be considered. The project no longer envisions a 24-hour bus lane, but rather a peak-period only-bus lane.

T (1)-161 *The issue of how long it takes to make a trip on one of these systems is something that's important for me in order to form my comments.*

Response: Travel time comparisons for project alternatives are provided in Chapter 5, Table 5-6, of the Draft EIR.

T (1)-167 *Some other ideas. Little—no matter where you put the alignment, you might want use little buses like Dash buses they have downtown, which are less expensive to run and could be run more frequently to feed in from the neighborhoods.*

Response: Feeder buses (similar to the DASH concept) will likely be implemented as demand indicates. Thirty-foot buses will not be able to carry the demand for Wilshire Boulevard. Current buses are 40 feet and are over-crowded. Larger-capacity buses are necessary for this corridor.

T (1)-217 *And as for making people get out of their cars, you must end the distinction of the MTA of local and express and put everything in one envelope and make it easier for people to ride.*

Response: Local, express, and rapid bus services are intended to serve different markets and different needs. While it creates a layer of complication for the prospective rider, it is able to provide real benefits for the types of trips that transit users make. A commuter traveling long distances would not use transit if the trip stopped frequently, causing considerable delay to the total trip time. A transit user who needs to use transit to make community-based trips needs a route that makes stops between major intersections. In addition, the use of local together with more express-like transit services is a common practice used by most transit agencies around the country.

T (1)-223 *I know that Los Angeles needs better public transportation. But if the plans meet our needs, then I believe that more and more people will get out of their cars and actually take the bus.*

But Los Angeles is a city that encompasses a wide area. People travel more than just from east to west. They go from north to south. You don't have enough links for your proposed transportation. There is nothing that is a major BRT link on Sepulveda Boulevard or through the Sepulveda pass along the freeway. You need many, many more links north to south in order to have all of this work.

Response: As noted, the success of any transit improvement is related to the connectivity it provides to other elements of the transit system. While the Mid-Cities/Westside Transit Corridor is intended to facilitate east-west travel movements, improvements in north-south transit service will help boost ridership overall.

Separate from this corridor study, the MTA is planning to expand its network of Metro Rapid routes. Several potential candidates are north-south routes serving the Westside along such streets as Vermont Avenue, Western Avenue, Crenshaw Boulevard, Sepulveda, and Lincoln Boulevard. These improvements should help address the improvement of north-south transit service.

T (1)-241 *But we do have Metro Rapid now. And those Red buses are doing and excellent job. And I feel that that's what we need , and if you're going to have a dedicated lane during rush hours, that seems much more sensible than trying to put any kind of a bus rapid transit through Wilshire Boulevard.*

Response: The alternative under consideration is the curb-lane, peak-hour only BRT system along Wilshire Boulevard.

Public Testimony, Wednesday, May 9, 2001

T (2)-18 *In exchange for which, of course, you get an exclusive bus lane, which means the buses could go even faster than 16 miles an hour that they get between stops now. But on the other hand you'd have no increase in the capacity of the buses themselves, because you'd still be running the same number of buses and they still have the same capacity per bus.*

Response: The exclusive bus lane is expected to improve bus speeds to about 19 miles per hour along the proposed BRT segment. In addition, bus capacity is in fact expected to improve since the project calls for articulated buses. An articulated bus increases capacity over a standard bus by about 44%. A double-articulated bus, which may be needed in the long term, doubles the capacity of a standard bus.

T (2)-47 *Funding. There's a funding shortfall on this project. We propose the community redevelopment agency draw project lines around proposed stations and use the tax increment money to fund a first-class transportation project.*

Response: As outlined in Chapter 5 of the Draft EIR, Table 5-3A, Proposed Funding Plan for Mid City Westside Transit Project, the funding comes from Federal Transit Administration's Section 5309 New Starts money, the State of California's Transportation Congestion Relief Plan and State Regional Improvement Funds (AB1012), and from Los Angeles County Proposition C local funds.

T (2)-49 *Most passengers do not use—most passengers use passes; they do not use cash. Please consider using bus pads instead of a dedicated lane.*

Response: Using the bus pad concept similar to Spring Street would definitely provide a superior running surface for the BRT service. To properly build these pads, however, would require reconstructing the existing street crown, necessitating a major street rebuilding project (also affecting a mature landscaped median) and requiring a significant expenditure, which we feel is disproportionate to the experimental nature of the A.M./P.M.

curb-lane concept on Wilshire. Even Spring Street was not concrete initially, but later so built when the concept was successful.

T (2)-171 I want to talk about the no-build option. What no-build means or some route in the rest of the city means that we continue to have the status quo traffic problems and air pollution in this area. Or what it means is according to studies there will be about 4 million more residents in the L.A. County over the next 20 years or so. So if for some reason this project is not built, we're going to get stuck with the same traffic or probably a lot worse.

Response: The commenter notes how bad traffic conditions will worsen if the No Build Option were selected, given the growth forecast for the region. This is confirmed in the Purpose and Need for the Project section (Section 1.3) of the Draft EIR. The Draft EIR does not identify the No Build Option as the environmentally superior alternative.

T (2)-175 We also talked about jobs. If you don't have a car, if you're low income people, you only can go so far in the traffic around here. But there are good jobs in downtown, there's good jobs on the Westside that your kids can go to if you can get there fast enough.

Response: As reflected on pages 3.4-19 of the Draft EIR, the proposed project would result in an improvement to the public transportation serving the study area, increasing the mobility and convenience to the transit-dependent population. As discussed in Tables 3.4.1 and 3.4.2 on pages 3.4-6 to 3.4-7 of the Draft EIR, a large percentage of households in the study area do not have a vehicle. Therefore, impacts to transit-dependent populations would be beneficial as a result of Wilshire BRT implementation.

Public Testimony, Monday, May 15, 2001

T (3)—35 They tell you how they're going to take people on in one second and two seconds. If you've ever ridden a trolley car, you know that's a lot of bunk. In regard to buses, you can't get on them in one or two seconds unless you run over somebody.

Response: It is hoped that the "smart card" concept will improve passenger flow with all doors open to ingress and egress. One to two seconds per entry would likely be reasonable with this fare payment system.

T (3)-38 One more question. Who's paying for all this?

Response: Refer to Table 5-3A of the Draft EIR, Proposed Funding Plan for Mid City/Westside Transit Project, for a discussion of funding sources.

T (3)-39 Who's paying for this? Judge Title, we're entitled to know who's paying for it.

Response: Refer to Table 5-3A of the Draft EIR, Proposed Funding Plan for Mid City/Westside Transit Project, for a discussion of funding sources.

T (3)-40 Is this a federal grant or is it coming out of the taxpayers?

Response: Refer to Table 5-3A of the Draft EIR, Proposed Funding Plan for Mid City/Westside Transit Project, for a discussion of funding sources.

T (3)-51 I did have a couple of questions and comments on some of the studies on the section 3.8 about the emissions. I'm assuming that the study was done on the compressed natural gas buses in the types of emissions. It wasn't quite stated there. I'm happy that you are considering electric and hybrids. The city of Burbank does use electric buses. They're a joy to drive behind. There are no emissions.

Response: The analysis in Section 3.8 of the Draft EIR analyzes emissions of compressed natural gas (CNG) buses.

T (3)-54 *And in Section 3.11 regarding the water resources and the ground water through new construction, I really like the pictures you showed of the Oregon system where they run grass down the center divider. There's an obvious concern in Los Angeles about runoff on adding any new impervious surfaces. Any more we can do to decrease that so the water is reclaimed or sustainable by running back into the ground water to help alleviate both flooding and pollution out to the ocean would be appreciated.*

Response: The alternative under consideration is a curb-lane, peak-hour only BRT system along Wilshire Boulevard. The proposed Wilshire BRT would reconstruct the outside curb lane to create a flat driving surface. Some of the existing storm drains would be reconstructed as part of the resurfacing process, such that surface water would continue to drain to the existing storm drain system at the existing volume and velocity. Additionally, as indicated in Section 3.11, all reconstruction activities will occur with the review and approval of the Engineering Bureau of each City through which the alignment traverses.

T (3)-123 *The MTA, if you read the draft, their own strategy is to close down Wilshire Boulevard. What they say is over the long run they want to discourage long-distance car travel down Wilshire and reserve it for short travel trip. A couple of blocks. Good-bye, Wilshire Boulevard.*

Response: The proposed project does not assume that Wilshire Boulevard will entirely close at any time for through-traffic. However, during construction activities, the curb lane of Wilshire Boulevard may be closed for re-surfacing and re-paving.

T (3)-146 *Operating costs would be significantly more. In all ways the light rail line is the economically superior, not to mention the much better for our quality of life. That's why so many people here tonight, so many other people favor the light rail option.*

Response: As shown in Table 5-3 of Chapter 5 of the Draft EIR, the operating costs for the project assumes a one-for-one replacement of the existing Metro Rapid Bus fleet with higher-capacity BRT vehicles. Operating costs would only slightly increase over existing costs because the same number of operators and maintenance staff would be needed to run the same number of vehicles. The vehicle capacity will increase, so more people will be able to use the same number of vehicles, resulting in a lower cost per new rider.

T (3)-173 *In previous sessions, hearings like this one, I've talked a lot about how the fact that most of my patients are transit dependent, many of them Medi-Cal, are impacted by the difficulty riding on a bus. And I've also commented about how those of my patients who use their cars are similarly affected because they're not much better off dealing with traffic.*

Response: As reflected on pages 3.4-19 of the Draft EIR, the proposed Wilshire BRT project would result in an improvement to the public transportation serving the study area, increasing the mobility and convenience to the transit-dependent population. As discussed in Tables 3.4.1 and 3.4.2 on Pages 3.4-6 to 3.4-7 of the Draft EIR, a large percentage of household in the Study Area do not have a vehicle. Therefore, impacts to transit-dependent populations would be beneficial as a result of Wilshire BRT implementation.

T (3)-214 *We've suggested earlier on another issue, the UCLA intramural parking garage project, that there be a joint venture development between UCLA and MTA to construct a public parking garage on Lot 32 so that you don't have to develop a Wilshire Boulevard bus way.*

Response: The commenter suggests a parking garage on UCLA Lot 32 as an alternative to the busway. Although this alternative would not satisfy the Purpose and Need of the proposed project and the alternatives considered in the Draft EIR for the transit demand of the corridor.

T (3)-216 *The biggest failure of the Wilshire bus way proposals is that you have not provided for any automobile parking access. There's no way to encourage people in the communities adjacent to Wilshire Boulevard to use this bus way project.*

Response: Please refer to Response to Comment IB (1)-2.

T (3)-412 *You can save yourself the money on Wilshire. $300 million a mile for bus way paving, save yourself the money, put articulated buses on Wilshire for extra capacity, and just spend the money where it's most effective, on the only rail line that we can build now to the Westside.*

Response: As described in Chapter 2.0 of the Draft EIR, the project alternatives have been designed to accommodate 60' articulated vehicles. Please refer to Topical Response D for a discussion of the Major Investment Study preceding this environmental study.

T (3)-420 *The draft EIR is deficient and may, in fact, be deficient in terms of CEQA requirements for full disclosure in that it does not include computer modeling of diverted traffic from the congestion points at any Country Club Drive and Comstock which would be created by the BRT system on Wilshire.*

Response: Please refer to Response to Comment CE (1)-6 for a discussion of diverted traffic at Country Club Drive and Comstock Avenue.

T (3)-421 *The other problems, of course, continuing on Wilshire are just amazing. The congestion that would be created when we have a $70 million Santa Monica Boulevard transit parkway project scheduled to start construction soon.*

Response: The Santa Monica Boulevard Transit Parkway Project will mitigate construction impacts to the extent feasible.

T (3)-458 *The pollution coming off the 10 that all of us have to contend with, those of us who live near the freeway, is only going to worsen over time. It's not a pollution from automobile exhaust, as many people believe. It's a pollution from fine particulate matter, highly abrasive. It comes from a million applications of brakes an hour on that freeway of brake material, which is highly abrasive, of the freeway and the tires being ground into fine powder, and all of that is being deposited over our neighborhoods and any neighborhood that lives near the freeway.*

Any housewife who leaves her windows open for two days running will have to wipe a blanket of dust off of everything in the house, and that dust is an abrasive dust, and we're all breathing that. Kids in our schools are breathing that.

Response: An air quality analysis for the proposed Wilshire BRT project is presented in Section 3.8 of the Draft EIR

T (3)-485 *L.A. needs a comprehensive transportation plan and transportation network. We need to complete the long-range plan so that we know the context in which this and other projects fit. I strongly—and I'd underline and put exclamation points after strongly—support the Expo light rail. I've been waiting for this for over 20 years. It's the only thing that makes sense for our area.*

Response: Refer to Response to Comment DAL (1)-6 for a discussion of projects that have been identified under the Long Range Transportation Plan to improve mobility and the quality of life for Los Angeles County.

9.6.4 Petitions

PB (1)-2 *Traffic in this area is already badly congested during certain periods of the day and will deteriorate even further with the opening of the 3 new residential buildings containing 282 units, between Westwood Boulevard and Westholme Avenue.*

Response: Traffic flow in the corridor will deteriorate as a result of the cumulative growth with or without this project. This is shown in Table 3.2.9 in the DEIS/DEIR where it is pointed out that vehicle trips will increase by 19% between 1998 and 2020 while vehicle hours of delay will more than double in the study area. This is a net result of reaching gridlock conditions. As is noted in the Purpose and Need section of the document the delay

time will grow on the highway and arterial networks to the extent that 40% of the travel time in peak hours will be wasted due to delay. This is without the project. The purpose of the project is to offer residents, visitors and employees of the Wilshire Corridor a mobility alternative to the mounting traffic congestion and expected delays and to increase the person carrying capacity of the corridor.

Additionally, the project will be providing new traffic signal systems and neighborhood traffic controls that will benefit both the buses and the auto traffic in terms of travel times and the residential areas in terms of controlling diverted traffic. It should be noted, that given the growth forecasts and the congestion increases shown in Section 3.2 and 1.1, the diversion of traffic would occur without the project as well as with it and the project provides a net benefit to the residents, employees and visitors of the study area.

PB (1)-3 *The proposed new bus lanes would also be a safety hazard. a. They would create additional street crossings by pedestrians crossing to the bus pick up areas. b. Pedestrians will dash across the street in order to catch a bus as it prepares to depart. c. The additional flow of pedestrians across traffic will further slow down Wilshire Corridor traffic.*

Response: Section 3.7 deals with motorist and pedestrian safety and Alternative 1B (Curb Adjacent Design Option) reduce conflicts over the median adjacent alternative in that pedestrians will be de-boarding and boarding the bus on the curb. This eliminates concerns a) and b) of the comment. Further, the removal of on-street parking at the intersections will increase the visibility of pedestrians at intersections and make crossing Wilshire more safe than currently.

There will be an addition of pedestrians crossing Wilshire due to increased transit usage, which lowers the vehicle counts over the No Project Alternative. The bus stops will be located at signalized intersections (preferably far—side) and thus the pedestrians will have safe access to cross the street. As to comment c), the purpose of the street is to move both pedestrians and vehicles and the vehicle code allows for pedestrians to have the right-of-way at signalized intersections. Inasmuch as travel speeds are going to decline from 34 miles per hour to 24 miles per hour within the study area (Table 3.2.9 of the DEIS/DEIR) due to increased auto traffic, we are moving in the right direction to provide usable, efficient and effective transit services for the corridor. Our results to date with the Bus Rapid Transit Systems in place now is a 40 percent increase in transit riders over regular arterial bus service so the system does work to attract people out of their cars and thus is contributing to speeding traffic flow and reducing our reliance on the automobile.

Additionally, the project will be providing new traffic signal systems and neighborhood traffic controls that will benefit both the buses and the auto traffic in terms of travel times and the residential areas in terms of controlling diverted traffic. It should be noted, that given the growth forecasts and the congestion increases shown in Section 3.2 and 1.1, the diversion of traffic would occur without the project as well as with it and the project provides a net benefit to the residents, employees and visitors of the study area.

Finally, all motorists become pedestrians at their origin and at their destination and thus the improvements BRT will make to the traffic signal network, transit network, street network and sidewalks will benefit motorists as well.

PC (1)-1 *1. Several buildings will lose their Loading Zones and street parking making moving in-and-out, receiving deliveries and accommodating large trucks difficult, if not impossible. Our costs to live on this street will increase accordingly.*

Response: Page 3.3-8 acknowledges that the BRT project will impact access and convenience significantly—this has been reduced because the BRT will operate in exclusive lanes only during the peak hours. This impact is less now that the BRT bus only lanes available in the peak hours only and are curb adjacent and most parking is prohibited now anyway in the peak hours.

The DEIS/DEIR points out in Table 3.2-9 that time spent in vehicles in traffic delay will grow by 103% by 2020 without this project so your cost (in both time and dollars) to live on this street will indeed increase irrespective of this project.

As has been demonstrated by the LAMTA BRT services operating now, a 40 % increase in transit ridership has occurred on these services. Many of these new riders formerly drove their cars to and from work and were part of the parking demand along the corridor. Section 3.3 of the DEIS/DEIR discusses parking and Table 3.3-3 shows the number of parking spaces that were going to be replaced when the project was going to be a bus lane for the entire day. The project is now peak hour only bus lanes and parking will not be significantly impacted due to the fact that parking on Wilshire is prohibited during peak hours.

As more riders use the BRT system, parking previously used by auto drivers will be freed up for use by other vehicles. To the extent that the BRT attracts new riders due to its relative speed and convenience, it may have positive effects on parking. That will be difficult to separate out; however, as vehicle trips are forecast to grow in the study area by 19 percent and vehicle delays will increase by double what they are now in the peak hours. It is therefore necessary to provide usable, efficient and effective transit alternatives to provide mobility for the public. The goal of the Wilshire BRT is to do that.

With expected travel delays set to double in the next 20 years, it will be absolutely necessary for transit vehicles to have priority treatment within traffic flow in order to provide residents, commuters and visitors with basic mobility.

Additionally, the project will be providing new traffic signal systems and neighborhood traffic controls that will benefit both the buses and the auto traffic in terms of travel times and the residential areas in terms of controlling diverted traffic. It should be noted, that given the growth forecasts and the congestion increases shown in Section 3.2 and 1.1, the diversion of traffic would occur without the project as well as with it and the project provides a net benefit to the residents, employees and visitors of the study area.

As to truck parking, double-parking on the street is illegal. We note that the numerous alleys along Wilshire that are between major streets are where most trucks do their loading and unloading as there are very few if any official truck delivery zones now in place. We expect that this will continue to occur.

PC (1)-2 *2. Although it is unclear in the recent DEIR report about eliminating the existing street parking and loading zones, we feel it is inevitable that eventually, parking will be limited at certain times of the day or prohibit parking altogether to accommodate loss of traffic lanes and flow of traffic on Wilshire Boulevard, thereby increasing the moving traffic lanes on each direction and contributing to an already short supply of off-street parking for visitors and/or contractors to the Wilshire Corridor.*

Response: Table 3.3-3 shows the parking that would have been replaced under the median adjacent BRT alternative and the 24 hour BRT alternative. There are seven (7) mitigation measures that would have been implemented to replace parking if the bus lanes and BRT were available on an all-day basis. These are listed on page 3.3-5 and are no longer proposed because the proposed project has been changed to be peak hour only BRT lanes.

Parking in the curb lane is now prohibited on most of Wilshire Blvd during the peak hours. The revised project consists of BRT in the curb lanes during peak hours and in mixed flow during the rest of the day. Thus parking is not significantly affected. Given the expected increase in vehicle delay in the Los Angeles County area and particularly in the study area (Table 3.2-9 shows that the county-wide delay is expected to double by 2020), it is entirely likely that the public would demand a transit alternative to this congestion in the future that is more comprehensive that simply peak hour BRT lanes. As this congestion occurs and trips grow by 19 %, you are correct in assuming that parking, road space and travel speeds will decline. In terms of the proposed project, the peak hour bus lanes and BRT system is intended to alleviate some of the problems we have in Los Angeles with

vehicles, slow transit trip times, and access to key employment and residential areas by transit. If we are as successful in this project as we have been with BRT elsewhere in the MTA system, we will enjoy a 40% ridership increase and the rate of traffic growth can be somewhat slowed.

The project, because it has been redefined to operate in bus only/right-turning vehicles only lanes, will not be replacing parking lost on a one-for one basis as was planned in the median and all day bus lane alternatives.

Additionally, the project will be providing new traffic signal systems and neighborhood traffic controls that will benefit both the buses and the auto traffic in terms of travel times and the residential areas in terms of controlling diverted traffic. It should be noted, that given the growth forecasts and the congestion increases shown in Section 3.2 and 1.1, the diversion of traffic would occur without the project as well as with it and the project provides a net benefit to the residents, employees and visitors of the study area.

PC (1)-3 *3. Having the MTA* shelter stops *either on the Curb Lane or Median Lane will increase the traffic, traffic speed, traffic noise and the airborne migration of air pollution into our homes.*

Response: The buses to be used for this project are powered by Compressed Natural Gas which are extremely low emission vehicles. The No Project alternative which would have buses in mixed flow during the peak hour would present the most serious impacts because these would increase:

- financial subsidy due to slower bus system speeds
- noise due to more buses running
- diesel as opposed to CNG buses and therefore more emissions and noise
- slower system speeds for all vehicles, and

Where BRT is running now in Los Angeles, LAMTA has seen a 40% ridership increase. According to the Table 3.2-9, the number of trips in the study area will increase by 19% and the time spent making those trips will increase by more than double (103%) without this project. The Wilshire BRT will have positive impacts on the travel speeds for buses and transit usage and will increase the person carrying capacity of the Wilshire Corridor and will do so in a way that is affordable and minimally impacting to residents. The project now consists of peak hour BRT service in exclusive lanes and in mixed flow the rest of the day. A comparison of Tables 3.2-17, 3.2-18, 3.2-21, 3-2-22, 3.2-23 shows that the curb lane BRT is the least impacting alternative to traffic and is better than either the Do Nothing Alternative and the TSM Alternative.

Additionally, the project will be providing new traffic signal systems and neighborhood traffic controls that will benefit both the buses and the auto traffic in terms of travel times and the residential areas in terms of controlling diverted traffic. It should be noted, that given the growth forecasts and the congestion increases shown in Section 3.2 and 1.1, the diversion of traffic would occur without the project as well as with it and the project provides a net benefit to the residents, employees and visitors of the study area.

PC (1)-4 *4. Entering and Exiting many buildings will become more dangerous due to the loss of vehicle staging areas.*

Response: Most of the Wilshire Blvd Corridor does not have vehicle parking during peak hours. In these areas the curb lane will be used by buses only during the peak hour. Right turning vehicles at intersections will also be allowed to use the curb lanes. Access into buildings at mid-block driveways will also be permitted from the curb lane. Bus stops will be placed at the far side of the intersections wherever possible. School buses will also be allowed to use their stops along the curb lane.

Additionally, by removing the parking during the peak hour, access for pedestrians during peak hours as they cross Wilshire Blvd. will be made safer due to increased visibility.

Additionally, the project will be providing new traffic signal systems and neighborhood traffic controls that will benefit both the buses and the auto traffic in terms of travel times and the residential areas in terms of controlling diverted traffic. It should be noted, that given the growth forecasts and the congestion increases shown in Section 3.2 and 1.1, the diversion of traffic would occur without the project as well as with it and the project provides a net benefit to the residents, employees and visitors of the study area.

Page 3.3-8 notes that the curb adjacent design increases safety by reducing vehicular conflicts associated with parking activity and that safety impacts would be beneficial.

PC (1)-5 *5. There will no longer be a buffer zone of parked cars or grass between pedestrians walking on the sidewalk and the fast moving traffic.*

Response: This impact is acknowledged on page 3.3-8 and is also now tempered by the facts that the BRT bus only lanes will be available only during peak hours and that the removal of parking during the peak hours at intersections will increase pedestrian visibility and safety at bus stops.

PC (1)-6 *6. Reports of accidents and fatalities along the Wilshire Corridor (Between Comstock and Westwood Boulevard) have increased significantly over the years and we fear the addition of MTA stops especially in the Median Adjacent Lane as suggested would make Wilshire Boulevard even more unsafe for pedestrians and commuters.*

Response: The proposed project is now curb-adjacent, peak-hour-only bus lanes and all-day BRT service, no peak-period dedicated lane is recommended between Comstock and Selby. In terms of safety, the BRT bus stops will be located far side of the intersections wherever possible, A comparison of Tables 3.2-17, 3.2-18, 3.2-21, 3-2-22, 3.2-23 shows that the curb lane BRT is the least impacting alternative to traffic and is better than either the Do Nothing Alternative or the TSM Alternative.

PC (1)-7 *7. The above listed negative situations may eventually impact our property values.*

Response: Of likely greater influence on property values is basic access and time spent getting there via car in the next 20 years. See Table 3.2-9, which shows a doubling of vehicle hours of delay by 2020 with only a 19 percent increase in vehicle trips. We anticipate that property values will be increasing in those areas with good transit service as is the case in urban areas throughout the United States, including relatively sprawled areas like San Jose and Sacramento.

A comparison of Tables 3.2-17, 3.2-18, 3.2-21, 3-2-22, 3.2-23 shows that the curb lane BRT is the least impacting alternative to traffic and is better than either the Do Nothing Alternative or the TSM Alternative.

PG (1)-7 *5. Increased Traffic Noise levels. The installation of shelter stop(s) throughout Wilshire Corridor (beginning on Comstock all the way to Westwood Boulevard) coupled with traffic congestion will eventually create a tremendous increase in traffic noise and ultimately make it unbearable to live on this residential neighborhood.*

Response: A comparison of Tables 3.2-17, 3.2-18, 3.2-21, 3-2-22, 3.2-23 shows that the curb lane BRT is the least impacting alternative to traffic and is better than either the Do Nothing Alternative or the TSM Alternative. Noise is similarly scaled to traffic. A primary purpose of having a bus only lane for transit is to run frequent bus service with fewer buses which is a benefit to congestion, transit subsidy levels, noise and air quality as well as the people moving capacity of the Wilshire corridor.

Table 3.9-5 shows the summary of noise impacts for the Wilshire BRT and there are no significant noise impacts caused by the BRT system. We acknowledge that the existing noise levels due to automobile traffic on Wilshire are high. This project is intended to remove automobiles from the network or at least slow their rate of growth and offer a mobility option for residents, employees and visitors to the area.

PG (1)-8 *6. **Increased Airborne Migration of Pollution.** We believe that the buses will emanate even greater amounts of air pollution into our homes thereby negatively affecting the quality of our lives and our health.*

Incidentally, the pile up of automobiles on Wilshire Boulevard caused by congestion will also increase the amount of airborne pollution intruding into our homes.

Response: You are correct that as the congestion increases (see Table 3.2-9) with or without this project, air quality will suffer due to the doubling of vehicle delays in the study area that is forecast by 2020. In as much as this project represents less than one tenth of one percent of the total vehicle miles operating on the road system, its contribution is insignificant. This is confirmed in Tables 3.8B-9, 3.8B-10 and 3.8-11 and 3.8B-12 which show that there are no instance where standards for criteria air pollutants are exceeded and that the BRT options are an improvement over the alternatives of doing nothing and the TSM alternative.

Furthermore, the BRT buses will by Compressed Natural Gas vehicles that emit far less pollution than standard diesel coaches.

PG (1)-9 *7. **Removal of Jut-Outs.** Those who exit their driveway onto Wilshire will be forced to pull out right into moving traffic. Once again, many of our residents are older and this would present a significant safety risk to those residents. As this project progresses, we feel it is inevitable that we will also lose our Loading Zones and Street Parking.*

Response: Page 3.3-8 (Parking impacts) acknowledges that the BRT project will impact access and convenience to on street parking significantly. This impact has been reduced because the BRT will operate in exclusive curb lanes only during the peak hours and in mixed flow during the rest of the day. Headways will be 3 minutes in the peak and 6.6 minutes in the off peak period. Since this is much less than the current headway between cars in the curb lanes during peak hours, your access to the street from your driveway will actually be improved. The overall impact of the BRT on on-street parking and vehicle delivery is less now than in the DEIS/DEIR since the BRT bus-only lanes available in the peak hours only and are curb adjacent. Most parking is prohibited now anyway in the peak hours.

Additionally, the project will be providing new traffic signal systems and neighborhood traffic controls that will benefit both the buses and the auto traffic in terms of travel times and the residential areas in terms of controlling diverted traffic. It should be noted, that given the growth forecasts and the congestion increases shown in Section 3.2 and 1.1, the diversion of traffic would occur without the project as well as with it and the project provides a net benefit to the residents, employees and visitors of the study area.

PG (1)-10 *8. **Removal of Loading Zones.** There will be nowhere for large Moving Vans, Commercial Vehicles, Delivery Trucks etc., to park. The Diplomat's driveway is so limited that large vehicles <u>may not be able</u> to access the driveway at all. Trucks may be forced to pull only part way into the driveway (partially blocking the new lane of traffic) and then back onto Wilshire Boulevard once delivery is completed. There is no feasible alternative for this problem! Loss of Loading Zones which also serves as our only street parking, will mean that other guests to the Wilshire Corridor will have nowhere to park their vehicles. We are not entitled to park on nearby adjacent streets as we are denied parking permits and cannot be expected to rely on such limited parking. (In any case, most of the available street parking services family homes and apartments.) The MTA has proposed building parking lots on adjoining and/or adjacent streets. How is this possible in a neighborhood occupied by family homes and residential buildings? **However, we do know that if we are left with this option, it <u>will be impossible</u> and impractical for the contractors, moving vans and visitors to ever be able to load and unload on these proposed parking lots. This is completely unacceptable and definitely not a viable alternative!***

Response: The MTA Wilshire BRT proposal no longer removes on-street parking in the Westwood area. Therefore, there would no longer be an impact to loading zones in this area. The bus lanes and BRT were available on an all-day basis. These are listed on page 3.3-5 and are no longer proposed because the proposed project has been changed to be peak hour only BRT lanes.

Parking in the curb lane is now prohibited on most of Wilshire Blvd during the peak hours. The revised project consists of BRT in the curb lanes during peak hours and in mixed flow during the rest of the day. Thus parking is not significantly affected.

Given the expected increase in vehicle delay in the Los Angeles County area and particularly in the study area (Table 3.2-9 shows that the county-wide delay is expected to double by 2020), it is entirely likely that the public would demand a transit alternative to this congestion in the future that is more comprehensive that simply bus lanes in the peak hours. We can expect that as the system becomes more and more congested, cities and counties will use available street space now used for parking to move vehicles—both transit and single occupant vehicles. There will be removal of on-street parking on major corridors as road space becomes gridlocked.

Our observations of loading areas on the Wilshire Corridor is that many commercial deliveries (including moving vans) are taken in the alleyways between major streets and this would be one solution for the peak hours.

Bear in mind also that as Wilshire Blvd congests during off-peak hours it is unlikely that you will be able to continue to have moving vans and commercial trucks use public roadways for deliveries.

Additionally, the project will be providing new traffic signal systems and neighborhood traffic controls that will benefit both the buses and the auto traffic in terms of travel times and the residential areas in terms of controlling diverted traffic. We would suggest that you make certain that your city knows of the need to provide access and the apparently non-code driveway at your building so that you are included in the neighborhood traffic control program for the project.

It should be noted, that given the growth forecasts and the congestion increases shown in Section 3.2 and 1.1, the diversion of traffic would occur without the project as well as with it and the project provides a net benefit to the residents, employees and visitors of the study area.

PG (1)-11 *In addition to the above, we also believe that in the 24 to 32 months it will require to build as suggested, the impact of construction such as noise, traffic and debris will be so excessive as to greatly affect our daily lives and the quality of living in our own neighborhood. We consider this a great assault on many of the residents who have spent many years preserving their property values creating one of Los Angeles' prime real estate neighborhoods.*

Response: Construction impacts are detailed in Section 3.18 and we draw your attention to Table 3.18-1, Activities column. Activities you will be unaware of include Surveying (1) and Site Preparation (2). As is explained in the text on page 3.18-2, where daytime construction is impossible due to heavy existing traffic volumes or opposed by the community, the contractor would be restricted to nighttime operation. The section goes on to point our that the construction will be done in segments over the total the entire timeframe of the project and that there will be a parking and traffic management plan to identify the construction staging and mitigation measures to the adjacent neighborhood that would be developed and approved by the community and local jurisdictions during the preliminary engineering of the project (page 3.18-2). Furthermore, this project now consists of only the needed utility relocation, minor repaving of the curb lanes, drainage improvements, new bus stops, and traffic signal work. There will be no grade separations.

Of likely greater influence on your property values is basic access and time spent getting there via car in the next 20 years. See Table 3.2-9, which shows a doubling of vehicle hours of delay by 2020 with only a 19 percent increase in vehicle trips. We anticipate that property values will be increasing in those areas with good transit service as is the case in urban areas throughout the United States, including relatively sprawled areas like San Jose and Sacramento.

PG (1)-12 *Furthermore, if the Wilshire BRT is approved, we fear that construction may occur simultaneously with the long and tedious construction on Santa Monica Boulevard all the way to the 405 freeway. As is, our patience is*

at its limit with the overflow of traffic caused by the Santa Monica construction and bringing on this ambitious project will create an even more horrendous traffic predicament for the residents living on the Wilshire Corridor.

Response: See the above response. Also, note that page 3.18-1 states that "In order to minimize any disruptions to traffic....control measures will be implemented with the coordination and involvement of the cities along the project route". We will add Caltrans to that listing and also add a further clarification and mitigation measure to ensure that the scheduling and construction of the busway on Wilshire is coordinated with Caltrans and City projects where possible. The ability of agencies to do that will depend upon a number of items including their funding, environmental clearance, bidding process, and materials availability.

PG (1)-13 *We recall that at one of the meetings held by the MTA, an overwhelming majority declared their opposition to the Wilshire BRT. The only riders the MTA can expect are those that already ride the Metro Rapid Buses. Thus far, the majority consensus' [sic] is that the Wilshire BRT will not attract new riders (particularly automobile users) as it was intended. However, we would like to support the majority in favor of the Exposition LRT as the only means to improving Public Transportation.*

Response: Your opinion is noted. Also note that since it began, the ridership on the BRT services running has increased 40% in one year. Note also that in areas similar to LA, where speedy and efficient transit run, auto users switch to transit to avoid parking, traffic and to use their time more productively.

PH (1)-3 *This will also increase traffic and safety concerns to our community.*

Response: A comparison of Tables 3.2-17, 3.2-18, 3.2-21, 3-2-22, 3.2-23 shows that the curb lane BRT is the least impacting alternative to traffic and is better than either the Do Nothing Alternative or the TSM Alternative. Noise is similarly scaled to traffic. A primary purpose of having a bus only lane for transit is to run frequent bus service with fewer buses which is a benefit to congestion, transit subsidy levels, noise and air quality as well as the people moving capacity of the Wilshire corridor.

You are correct that as the congestion increases (see Table 3.2-9) with or without this project, traffic conditions suffer due to the expected doubling of vehicle delays in the study area that is forecast by 2020. In as much as the Bus volumes with the BRT system represent less than one tenth of one percent of the total vehicle miles operating on the road system, its contribution is insignificant.

Additionally, the project will be providing new traffic signal systems and neighborhood traffic controls that will benefit both the buses and the auto traffic in terms of travel times and the residential areas in terms of controlling diverted traffic. We would suggest that you make certain that your city knows of the need to provide access and the apparently non-code driveway at your building so that you are included in the neighborhood traffic control program for the project. It should be noted, that given the growth forecasts and the congestion increases shown in Section 3.2 and 1.1, the diversion of traffic would occur without the project as well as with it and the project provides a net benefit to the residents, employees, and visitors of the study area.

As to safety, no significant safety impacts were found to exist with the curb lane BRT. In fact, visibility at intersections for both vehicles and pedestrians is increased during the peak hours when the bus only lane will be in operation. This is a beneficial impact of the project. Bus stops will be placed far side of the intersection wherever feasible to accommodate right turning traffic; keep the buses moving, and for pedestrian safety.

APPENDICES

APPENDIX A LIST OF PERSONS, ORGANIZATIONS, AND PUBLIC COMMENTING IN THE DRAFT EIS/EIR FOR THE MID-CITY/WESTSIDE TRANSIT CORRIDOR PROJECT

Appendix A

List of Persons, Organizations, and Public Agencies Commenting on the Draft EIS/EIR for the Mid-City/Westside Transit Corridor Project

Comment Ltr Code	*Commmentor*	*Affiliation*	*Type of Affiliation*	*Date*
		Federal Agencies		
FEMA(1)	Amaglio, Sandro	Federal Emergency Management Agency	(1) Government - Federal	5/18/01
USDOI(1)	Taylor, Willie R.	United States Department of the Interior	(1) Government - Federal	8/13/01
USDOT(1)	Adams, M. Charlotte	U.S. Department of Transportation	(1) Government - Federal	9/13/00
USEPA(1)	Hanf, Lisa B.	United States Environmental Protection Agency	(1) Government - Federal	6/11/01
		State Agencies		
CADFG(1)	Raysbrook, C.F.	Department of Fish and Game	(2) Government - State	6/13/01
CADOT(1)	Buswell, Stephen	Department of Transportation	(2) Government - State	5/31/01
CATC(1)	Lawrence, Allen	California Transportation Commision	(2) Government - State	6/30/01
MTA(1)	De la Loza, James L.	Metropolitan Transportation Authority	(2) Government - State	6/13/01
OPR(1)	Governor's Office of Planing and Research	State of California	(2) Government - State	6/1/01
OPR(2)	Governor's Office of Planing and Research	State of California	(2) Government - State	6/7/01
		Regional Agencies		
CLAFD(1)	Leininger, David R.	County of Los Angeles Fire Department	(3) Government - Regional	5/29/01
LACPW(1)	Kumboto, Rod H.	Los Angeles County Public Works	(3) Government - Regional	6/4/01
LACSD(1)	Frazen, Ruth I.	Los Angeles County Sanitation Districts	(3) Government - Regional	5/31/01
LAUSD(1)	Boull't, Enrique	Los Angeles Unified School District	(3) Government - Regional	6/11/01
LAUSD(2)	Romer, Roy	Los Angeles Unified School District	(3) Government - Regional	6/12/01
LAUSD(3)	Nardulli, Joe	Los Angeles Unified School District	(3) Government - Regional	6/13/01
LAUSD(4)	Manford, Robert	Los Angeles Unified School District	(3) Government - Regional	6/14/01
LAUSD(5)	Harris, Elizabeth J.	Los Angeles Unified School District	(3) Government - Regional	6/15/01
NHM(1)	Roeder, Richard K.	Natural History Museum	(3) Government - Regional	6/14/01
SCAG(1)	Smith, Jeffrey M.	Southern California Association of Governments	(3) Government - Regional	6/14/01
SCAG(2)	Ikhrata, Hasan	Southern California Association of Governments	(3) Government - Regional	6/15/01
		Local Agencies		
CBH(1)	Egerman, Mark	City of Beverly Hills	(4) Government - City	6/6/01
CBH(2)	Reynolds, Vicki	City of Beverly Hills	(4) Government - City	6/13/01
CBH(3)	Egerman, Mark	City of Beverly Hills	(4) Government - City	6/6/01
CCC(1)	Valladares, Ela	City of Culver City	(4) Government - City	6/13/01
CLA(1)	Banerjee, Frances T.	City of Los Angeles	(4) Government - City	6/15/01
CLA(2)	Nova, Orlando E.	City of Los Angeles	(4) Government - City	6/14/01
CLA(3)	Vir, Haripal S.	City of Los Angeles	(4) Government - City	6/22/01
CRALA(1)	Scharlin. Jerry A.	City of Los Angeles ???	(4) Government - City	6/23/01
CSM(1)	Feinstein, Michael	City of Santa Monica	(4) Government - City	6/14/01
CSM(2)	McCarthy, Susan E.	City of Santa Monica	(4) Government - City	6/14/01

Appendix A

List of Persons, Organizations, and Public Agencies Commenting on the Draft EIS/EIR for the Mid-City/Westside Transit Corridor Project

Comment Ltr Code	*Commmentor*	*Affiliation*	*Type of Affiliation*	*Date*
EDC(1)	Joyce Perkins	Economic Development Council, Eighth District	(4) Government - City	6/15/01
LAC(1)	Roberts, David	Los Angeles City Council	(4) Government - City	5/1/01
LAC(2)	Exposition Park and Figueroa Corridor Circulation and Parking Task Force members	Los Angeles City Council	(4) Government - City	5/1/01
LAC(3)	Exposition Park Stakeholders	LosAngeles City Council	(4) Government - City	5/1/01
	Bouchereau	response to comment letter	(4) Government -City	6/6/01
		Organizations		
AAA(1)	Finnegan, Stephan A.	Automobile Club of Southern California	(5) Organization	5/7/01
BOMA(1)	Ely, Geoffrey M.	BOMA	(5) Organization	6/7/01
BRU(1)	Mann, Eric	Bus Riders Union	(5) Organization	6/15/01
CCALA(1)	Schatz, Carol E.	Central City Association of Los Angeles	(5) Organization	6/15/01
CEN(1)	Nunez, Cecilia	Neighbors For An Improved Community	(5) Organization	6/26/01
CSC(1)	Rudolph, Jeffrey N.	California Science Center	(5) Organization	4/25/01
CWTS(1)	Fracassi, Roderick J.	Con-Way Transportation Services	(5) Organization	6/14/01
DARA(1)	Harris, Arthur	Downtown Area Resident's Association	(5) Organization	6/14/01
EDC(2)	The Economic Development Council, Eight District Empowerment Congree		(5) Organization	6/15/01
EDF(1)	Flores, Edith	Westwood Garden Civic Organization	(5) Organization	n/a
EXPO(1)	McCullough, Patrick	EXPO Neighbors Association	(5) Organization	5/10/01
FCP(1)	Holter, Darryl	Figueroa Corridor Partnership	(5) Organization	4/27/01
FET(1)	Clarke, Darrell	Friends 4 Expo Transit	(5) Organization	6/15/01
GO(1)	Needleman, Steve	The Grand Olympic	(5) Organization	4/19/01
HWPOA(1)	Patterson, Tom	Holmby-Westwood Property Owners Association	(5) Organization	6/15/01
HWPOA(2)	Patterson, Tom	Holmby-Westwood Property Owners Association	(5) Organization	6/15/01
JA(1)	Allen, Jack	Palisades Preservation Association	(5) Organization	6/13/01
JACLA(1)	Ushijima, Jean	West LA Japanese American Citizens League Auxliary	(5) Organization	4/26/01
JUM(1)	Maher, Julia	Castle Heights Neighborhood Association	(5) Organization	6/14/01
KAC(1)	Cropper, Karin	West of Westwood Homeowners Association	(5) Organization	6/25/01
KR(1)	Greenup, Campbell Hugh	Kilroy Realty	(5) Organization	6/14/01
LACBC(1)	Strumpell, Kent (Milam, Ron)	Los Angeles County Bicycle Coalition	(5) Organization	6/15/01
LACGC(1)	Pfromm, Elizabeth W.	Los Angeles Child Guidance Clinic	(5) Organization	6/11/01

Appendix A

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LC(1)	Cohen, Lyn MacEwen and Wally Marks	Mireacle Mile Civic Coalition	(5) Organization	5/7/01
LUF(1)	Garcia, Ramon	Latino Urban Forum	(5) Organization	6/13/01
MCPAC(1)	Gagan, Patti	Music-Center Performing Arts Center of Los Angeles	(5) Organization	6/4/11
OIAKF(1)	Dakhil, Dafer M.	OMAR IBN AL KHATTAB Foundation	(5) Organization	6/12/01
PWHA(1)	N/A	Park Wilshire Homeowners Association, Inc	(5) Organization	6/5/01
RA(1)	Andersen, Ronald Diane Andersen	Park Wilshire	(5) Organization	7/24/01
SC(1)	Smith, Frederick and Laurie Samitaur	Samitaur Constructs	(5) Organization	6/11/01
SMCOC(1)	Ehrler, Daniel L.	Santa Monica Chamber of Commerce	(5) Organization	6/6/01
SPPC(1)	Lee, DeVaughn	St. Paul's Presbyterian Church (USA)	(5) Organization	2/23/01
TNA(1)	Harmetz, Richard S.	Tract NO.7260 Association, inc.	(5) Organization	5/15/01
TP(1)	Richman, Deborah	TurningPoint	(5) Organization	6/12/01
TT(4)	Tippit, Terri	West of Westwood HOA	(5) Organization	6/10/01
WAC(1)	Russell, Gary (Stephan Kramer, Andrew Militois, Wally Marks)	Wilshire Advocates Coalition	(5) Organization	5/5/01
WCA(1)	Westford Board of Directors	The Westford Condominium Association	(5) Organization	5/25/01
WHA(1)	Agay, Richard D.	Westwood Homeowners Association	(5) Organization	6/14/01
WT(1)	Maltz, M.M.	Wilshire Terrace	(5) Organization	6/25/01
WVCA(1)	West, Charles A.	Westside Village Civic Association	(5) Organization	5/27/01
		Individuals		
MA(1)	Abdul, Masarat	None	(6) Individual	
LA(1)	Abe, Lynn	None	(6) Individual	6/6/01
GA(1)	Abel, George T., Rose M. Abel	None	(6) Individual	5/16/01
MARA(1)	Abreu, Maria T,	None	(6) Individual	5/16/01
GREA(1)	Ackerman, Gregg and Rickey	None	(6) Individual	5/29/01
DA(1)	Adams, David	None	(6) Individual	6/4/01
JAA(1)	Aftergood, Jacob	None	(6) Individual	6/15/01
ALEK(1)	alek@juno.com	None	(6) Individual	6/14/01
CA(1)	Alex, Cynthia	None	(6) Individual	6/13/01
RUA(1)	Alfaro, Rudolph	None	(6) Individual	6/6/01
AA(1)	Algaze, Albert	None	(6) Individual	n/a
AA(2)	Algaze, Albert	None	(6) Individual	6/1/01

Appendix A

List of Persons, Organizations, and Public Agencies Commenting on the Draft EIS/EIR for the Mid-City/Westside Transit Corridor Project

Comment Ltr Code	*Commmentor*	*Affiliation*	*Type of Affiliation*	*Date*
MARIA(1)	Allardyez, Marilyn	None	(6) Individual	
CAA(1)	Alley, Caroline W. James F. Alley	None	(6) Individual	6/3/01
CEA(1)	Alonso, Cecilia	None	(6) Individual	
FA(1)	Alper, Florence Max Alper	None	(6) Individual	6/4/01
SA(1)	Alschuler, Selma L.	None	(6) Individual	6/8/01
WA(1)	Alschuler, Walter W.	Westside Village Association	(5) Organization	6/13/01
JIA(1)	Amatya, Jitendra	None	(6) Individual	6/11/01
SAA(1)	Ambler, Sam	None	(6) Individual	n/a
ADA(1)	Anathan, Adele	None	(6) Individual	6/18/01
CARA(1)	Andrus, Carlin S.	None	(6) Individual	4/28/01
msg	Aneja, Rajan	None	(6) Individual	
Anon(01)	Anonymous	None	(6) Individual	n/a
Anon(02)	Anonymous	None	(6) Individual	n/a
Anon(03)	Anonymous	None	(6) Individual	n/a
Anon(04)	Anonymous	None	(6) Individual	n/a
Anon(05)	Anonymous	None	(6) Individual	n/a
Anon(06)	Anonymous	None	(6) Individual	n/a
Anon(07)	Anonymous	None	(6) Individual	n/a
Anon(08)	Anonymous	None	(6) Individual	n/a
Anon(09)	Anonymous	None	(6) Individual	n/a
Anon(10)	Anonymous	None	(6) Individual	n/a
Anon(11)	Anonymous	None	(6) Individual	n/a
Anon(12)	Anonymous	None	(6) Individual	n/a
Anon(13)	Anonymous	None	(6) Individual	n/a
Anon(14)	Anonymous	None	(6) Individual	n/a
Anon(15)	Anonymous	None	(6) Individual	6/13/01
Anon(16)	Anonymous	None	(6) Individual	n/a
Anon(17)	Anonymous	None	(6) Individual	n/a
Anon(18)	Anonymous	None	(6) Individual	n/a
Anon(19)	Anonymous	None	(6) Individual	n/a
Anon(20)	Anonymous	None	(6) Individual	n/a
Anon(21)	Anonymous	None	(6) Individual	n/a
Anon(22)	Anonymous	None	(6) Individual	n/a
Anon(23)	Anonymous	None	(6) Individual	n/a
Anon(24)	Anonymous	None	(6) Individual	
Anon(25)	Anonymous	None	(6) Individual	
Anon(26)	Anonymous	None	(6) individual	6/13/01

Appendix A

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EA(1)	Anshansli, Erin	None	(6) Individual	n/a
AODC(1)	aodc_squeakywheel@hotmail .com	None	(6) Individual	6/10/01
MIA(1)	Ariga, Michiko	None	(6) Individual	n/a
GEA(1)	Arkin, George Carol Arkin	None	(6) Individual	5/11/01
MAA(1)	Armand, Marcel	None	(6) Individual	n/a
CHA(1)	Armon, Cheryl	None	(6) Individual	6/10/01
RIA(1)	Arnold, Richard	Westwood of Westwood Homeowners Association	(6) Individual	5/26/01
WEA(1)	Arnold, Wendy	West of Westwood HOA	(6) Individual	
GRA(1)	Asher, Grieg	None	(6) Individual	5/29/01
AUNT(1)	Auntminla@aol.com	None	(6) Individual	6/10/01
BA(1)	Azarmi, Bob	None	(6) Individual	6/8/01
HB(1)	Baft, Hattie	None	(6) Individual	n/a
SB(1)	Bainbridge, Sean	None	(6) Individual	6/13/01
PB(1)	Bakhshi, Pouran Mahnaz Bolour	West of Westwood Homeowners Association	(6) Individual	n/a
GB(1)	Bakus, Gerald J.	University of Southern California	(6) Individual	5/25/01
CB(1)	Barcela, C.	None	(6) Individual	6/14/01
HEB(1)	Baron, Henry L.	None	(6) Individual	6/15/01
SCB(1)	Barrow, Scott	None	(6) Individual	6/14/01
FB(1)	Barton, Fred R.	None	(6) Individual	n/a
NB(1)	Basu, Netai	None	(6) Individual	6/15/01
CARB(1)	Beauchamp, Carl Thomas J. Flynn	None	(6) Individual	6/7/01
JB(1)	Beccaria, John	Best Western Royal Palace Inn & Suites	(6) Individual	6/15/01
msg	Beck, Jeffrey	None	(6) Individual	4/2/01
TB(1)	Becktold, Tom	None	(6) Individual	6/11/01
TB(2)	Becktold, Tom	None	(6) Individual	n/a
BRB(1)	Bell, Bradford	None	(6) Individual	5/29/01
PAB(1)	Benigno, Paul	None	(6) Individual	6/13/01
WIB(1)	Berelson, Wil	None	(6) Individual	n/a
DB(1)	Beri, David	None	(6) Individual	6/7/01
OB(1)	Berliner, Oliver	None	(6) Individual	5/8/01
BAB(1)	Bersell, Barbara	None	(6) Individual	n/a
JOB(1)	Beumer, John [family]	None	(6) Individual	6/10/01
IB(1)	Bibawi, Ishak	None	(6) Individual	5/15/01
GLB(1)	Billingsley, Glenn	Billingsley Restaurant	(6) Individual	n/a
MAB(1)	Blakely, Marilyn	None	(6) Individual	6/6/01

Appendix A

List of Persons, Organizations, and Public Agencies Commenting on the Draft EIS/EIR for the Mid-City/Westside Transit Corridor Project

Comment Ltr Code	*Commmentor*	*Affiliation*	*Type of Affiliation*	*Date*
MAB(3)	Blakely, Marilyn	None	(6) Individual	6/6/01
MAB(2)	Blakely, Marilyn	West of Westwood HOA	(6) Individual	6/6/01
MARIB(1)	Block, Marian	None	(6) Individual	n/a
MB(1)	Block, Marian	None	(6) Individual	
MIB(1)	Block, Mitchell	None	(6) Individual	6/10/01
KB(1)	Blum, Ken	None	(6) Individual	4/30/01
LB(1)	Bolke, Lillian	West of Westwood Homeowners Association	(6) Individual	
CAB(1)	Bosil, Carolyn	None	(6) Individual	6/7/01
BB(1)	Boyd, Bob	None	(6) Individual	6/4/01
KAB(1)	Brandon, Kathleen	None	(6) Individual	6/27/01
MARVB(1)	Breslauer, Marvin A	None	(6) Individual	
JUB(1)	Brode, Juli	None	(6) Individual	6/12/01
AB(1)	Brook, Arlinda	None	(6) Individual	n/a
PAB(1)	Brooks, Paula	None	(6) Individual	5/25/01
WB(1)	Brooks, William M. [Hansen, Jeffery A.]	Miracle Mile Residents Association [Masselin Avenue Homeowners Association]	(6) Individual	6/10/01
MARB(1)	Brown, Mark	None	(6) Individual	6/12/01
MARB(2)	Brown, Mark	None	(6) Individual	6/14/01
RB(1)	Bruni, Robert	None	(6) Individual	
JIB(1)	Burkholder, Jim	None	(6) Individual	6/13/01
JEAB(1)	Bushnell, Jean	None	(6) Individual	6/13/01
JEB(1)	Bushnell, Jean	None	(6) Individual	6/11/01
DAVC(1)	Caldwell, David	None	(6) Individual	6/11/01
KEC(1)	Campford, Kent	West of Westwood HOA	(6) Individual	
NC(1)	Cannon, Nicole	None	(6) Individual	6/13/01
ALC(1)	Cassidy, Alice Martin Cassidy, Barbara Coffin, Fred Coffin	None	(6) Individual	n/a
JC(1)	Cerny, Julie	None	(6) Individual	
JEC(1)	Chang, Jeff	None	(6) Individual	
SC(1)	Chapin, Stuart Vanessa Chapin	None	(6) Individual	4/22/01
PC(1)	Chavez, Phil	None	(6) Individual	n/a
ROC(1)	Cheeseboro, Robert Margrit	Friends 4 Expo	(6) Individual	6/1/01
DARC(1)	Cherness, Darryl	None	(6) Individual	n/a
DC(1)	Cherness, Darryle	None	(6) Individual	5/30/01
MAC(1)	Cherry, Maris	None	(6) Individual	

Appendix A

List of Persons, Organizations, and Public Agencies Commenting on the Draft EIS/EIR for the Mid-City/Westside Transit Corridor Project

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MC(1)	Cherry, Maris Pamela	None	(6) Individual	5/25/01
KEIC(1)	Chinn, Keisha	EXPO Neighbors Association	(6) Individual	5/15/01
JOSC(1)	Choueiry, Joseph	None	(6) Individual	
EVC(1)	Christensen, Evelyn G.	None	(6) Individual	6/15/01
KC(1)	Christensen, Kimberely	None	(6) Individual	6/15/01
MEC(1)	Chuiros, Mercedes P.	None	(6) Individual	6/5/01
BC(1)	Clark, Barbara	None	(6) Individual	6/8/01
CIC(1)	Clark, Cindy	None	(6) Individual	5/21/01
DAC(1)	Clarke, Darrell	None	(6) Individual	6/15/01
STC(1)	Clements, Stephanie	None	(6) Individual	5/11/01
ANC(1)	Coccio, Angela Jane	None	(6) Individual	6/8/01
JAC(1)	Cohen, Janiece Cindy Clark	None	(6) Individual	5/28/01
ADC(1)	Collis, Adam	None	(6) Individual	5/29/01
AC(1)	Concors, Anne	None	(6) Individual	5/18/01
AC(2)	Concors, Anne	None	(6) Individual	
ANNC(1)	Concors, Anne	West of Westwood Homeowners Association	(6) Individual	n/a
MIC(1)	Concors, Mitch	None	(6) Individual	n/a
RC(1)	Copes, Renee A.	None	(6) Individual	6/4/01
CC(1)	Cordova, Carlene	None	(6) Individual	6/10/01
JOC(1)	Cotton, Joseph	None	(6) Individual	n/a
SUC(1)	Cotton, Suzanne	Westside Village Association	(6) Individual	6/5/01
IC(2)	Cowan, Ian	None	(6) Individual	n/a
IC(1)	Cowan, Ian A.	None	(6) Individual	6/10/01
FC(1)	Crestejo, Frank and Syvia	Westside Village Association	(6) Individual	6/13/01
CSOL(1)	Csolv@aol.com	None	(6) Individual	6/10/01
MC(1)	Culjat, Martin	None	(6) Individual	6/13/01
PHD(1)	Dafesh, Phillip A.	Westside Village Association	(6) Individual	n/a
ROD(1)	Daggs, Roy	None	(6) Individual	6/18/01
MD(1)	Dauber, Marc and Kathleen	None	(6) Individual	6/3/01
MID(1)	Dave, Michael	None	(6) Individual	
RD(1)	Davies, Russ	None	(6) Individual	6/4/01
RUD(1)	Davies, Russ	None	(6) Individual	n/a
MAD(1)	Deacy, Margaret	None	(6) Individual	n/a
HD(1)	Dickinson, Harry and Lois	None	(6) Individual	6/13/01
DD(1)	Dimascio, Debbie	None	(6) Individual	6/3/01
DAD(1)	Donohue, Daniel J.	Wilshire House	(6) Individual	6/7/01

Appendix A

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JD(1)	Dorfman, Joanne and Bruce	None	(6) Individual	6/14/01
JAD(1)	Duffy, Janette L.	None	(6) Individual	4/4/01
PD(1)	Duke, Peter	None	(6) Individual	6/11/01
HED(1)	Duran, Herbert	None	(6) Individual	n/a
MARD(1)	Durkin, Mary	None	(6) Individual	5/30/01
ID(1)	Duvivier, Isabelle	None	(6) Individual	n/a
ME(1)	Eatmal, Matthew	None	(6) Individual	n/a
CE(1)	Edelsohn, Charles	None	(6) Individual	6/10/01
CE(2)	Edelsohn, Charles	None	(6) Individual	6/15/01
msg	Edelsohn, Charles	None	(6) Individual	6/14/01
msg	Edelsohn, Charles	None	(6) Individual	6/14/01
msg	Edelsohn, Charles	None	(6) Individual	6/14/01
msg	Edwards, Karen	None	(6) Individual	5/31/01
RE(1)	Edwards, Robert and Mary Louise	None	(6) Individual	5/31/01
TE(1)	Edwards, Todd	None	(6) Individual	5/31/01
EHG(1)	ehg21@yahoo.com	None	(6) Individual	6/7/01
EE(1)	Ehrlich, Ellen	None	(6) Individual	n/a
AE(1)	Eliseyan, Andrea and Patrick	None	(6) Individual	n/a
PE(1)	Elliott, Phyllis	None	(6) Individual	6/15/01
NE(1)	Epstein, Nancy	Wilshire House	(6) Individual	6/7/01
GE(1)	Erich, Greg	None	(6) Individual	
CIE(1)	Erickson, Cindy	None	(6) Individual	
MIE(1)	Ernstoff, Michael	None	(6) Individual	6/8/01
SE(1)	Evans, Shirley	West of Westwood Homeowners Association	(6) Individual	
HE(1)	Ezra, Habtnesh	None	(6) Individual	
SHF(1)	Familian, Shirley and Isadore	None	(6) Individual	5/14/01
IF(1)	Faraj, Ihsan	None	(6) Individual	
HF(1)	Faray, Hayden	None	(6) Individual	
DAF(1)	Faulkner, David	Westside Village Association	(6) Individual	6/1/01
MF(1)	Fell, Michael J.	None	(6) Individual	6/11/01
ELF(1)	Fenent, Elizabeth	Westside Village Association	(6) Individual	6/8/01
DOF(1)	Ferguson, Donald	None	(6) Individual	5/15/01
BF(1)	Filet, Barbara	None	(6) Individual	5/30/01
MARF(1)	Fink, Martha	None	(6) Individual	5/19/01

Appendix A

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JF(1)	Finn, Jack	None	(6) Individual	6/22/01
SF(1)	Fiske, Steve	Westwood Garden Civic Organization	(6) Individual	
CATF(1)	Flanigan, Cathie	None	(6) Individual	6/11/01
PF(1)	Flanigan, Patsy	None	(6) Individual	6/15/01
KEF(1)	Fleischer, Kenneth	None	(6) Individual	5/22/01
KF(1)	Flicker, Kevin G.	None	(6) Individual	6/10/01
EDF(1)	Flores, Edith	None	(6) Individual	
MAF(1)	Fonda-Bonardi, Mario	None	(6) Individual	n/a
CAF(1)	Fondevila, Carol	None	(6) Individual	5/7/01
ARF(1)	Ford, Arsenia Renee and DaShon McNeely	None	(6) Individual	n/a
CHF(1)	Ford, Chris	None	(6) Individual	n/a
BRF(1)	Forsythe, Brook	None	(6) Individual	5/2/01
RF(1)	Foster, Rob	None	(6) Individual	n/a
FD(1)	Frances, Doran	None	(6) Individual	
HEF(1)	Franke, Heide	None	(6) Individual	4/28/01
HEIF(1)	Franke, Heide	None	(6) Individual	n/a
EF(1)	Franklin, Edward M.	Castle Heights Neighborhood Association	(6) Individual	6/4/01
DF(1)	Freidman, David	None	(6) Individual	
AF(1)	Friedenberg, Alan (Koblitz, Karen)	None	(6) Individual	5/27/01
ALF(1)	Friedman, Alexander	None	(6) Individual	4/20/01
ALF(2)	Friedman, Alexander	None	(6) Individual	5/16/01
CF(1)	Furth, Charlotte	None	(6) Individual	5/24/01
MG(1)	Gabai, Michael	West of Westwood Homeowners Association	(6) Individual	n/a
VG(1)	Garcia, Victor	None	(6) Individual	6/6/01
IG(1)	Geldin, Irving	Wilshire House	(6) Individual	6/10/01
GG(1)	Gentschev, Greg	None	(6) Individual	4/28/01
STG(1)	Gibbs, Stuart	None	(6) Individual	6/3/01
ELG(1)	Glasser, Elan and Deborah	None	(6) Individual	n/a
ELG(2)	Glasser, Elan and Deborah	None	(6) Individual	6/7/01
DG(1)	Glines, David	None	(6) Individual	
SUG(1)	Glines, Susan	None	(6) Individual	6/12/01
PG(1)	Gold, Peter and Gloria	Wilshire House	(6) Individual	6/5/01
AG(1)	Goldberg, Andrew	None	(6) Individual	n/a
MIG(1)	Goldman, Michael	None	(6) Individual	n/a

Appendix A

List of Persons, Organizations, and Public Agencies Commenting on the Draft EIS/EIR for the Mid-City/Westside Transit Corridor Project

Comment Ltr Code	*Commmentor*	*Affiliation*	*Type of Affiliation*	*Date*
SCG(1)	Goldman, Scott	None	(6) Individual	6/5/01
GUG(1)	Gomalez, Guadalupe	None	(6) Individual	
SG(1)	Gonzales, Suzanne	Westwood Garden Civic Organization	(6) Individual	
MAG(1)	Goodson, Marvin	None	(6) Individual	6/22/01
BG(1)	Gordon, Bryan	None	(6) Individual	5/14/01
JG(1)	Gotlieb, Jerry	None	(6) Individual	6/4/01
EG(1)	Gralla, Edith	None	(6) Individual	6/11/01
IRG(1)	Grant, Irvin and Lorraine	None	(6) Individual	6/24/01
GERG(1)	Green, Geraldine	None	(6) Individual	5/20/01
KG(1)	Green, Kathryn K.	None	(6) Individual	6/14/01
BEG(1)	Greenfield, Bella Ph. D	None	(6) Individual	6/22/01
GEG(1)	Greenfield, Gertrude	None	(6) Individual	
GREG(1)	gregors@mediaone.net	None	(6) Individual	
WG(1)	Grishanond, Walter	None	(6) Individual	
BGR(1)	Groat, B.	None	(6) Individual	6/8/01
OG(1)	Grossman, Ofer	None	(6) Individual	6/10/01
ANG(1)	Grullanovich, Andrew	None	(6) Individual	
FG(1)	Gurzeler, Fred	None	(6) Individual	n/a
COH(1)	Habeeb, Colette	Westwood Garden Civic Organization	(6) Individual	
ROBH(1)	Hackamack, Robert	None	(6) Individual	n/a
AHA(1)	Halsema, A.I. And Carol Linnell-Halsema	None	(6) Individual	5/16/01
SHA(1)	Hampton, S.	None	(6) Individual	n/a
MH(1)	Hansen, Molly C.	None	(6) Individual	6/14/01
MIKH(1)	Harari, Mike Irit	Wilshire House	(6) Individual	6/11/01
JOEH(1)	Hariton, Joe (Hariton, Diane)	None	(6) Individual	5/29/01
JOEH(2)	Hariton, Joe and Diane	None	(6) Individual	
CH(1)	Harmon, Carol D.	None	(6) Individual	6/29/01
MICH(1)	Harriet, Michel and Denise	None	(6) Individual	5/15/01
BRAH(1)	Harris, Bradley	None	(6) Individual	6/14/01
SKH(1)	Harris, Skip and Victoria	None	(6) Individual	6/10/01
STAH(1)	Harris, Stanley E.	None	(6) Individual	6/11/01
JH(1)	Haskins, Jackie	None	(6) Individual	
TOH(1)	Hatter, Tom and Lisa	None	(6) Individual	5/30/01
DIH(1)	Haun, Diane	None	(6) Individual	6/9/01
AH(1)	Havens, Alan D.	None	(6) Individual	6/9/01
AH(2)	Havens, Alan D.	None	(6) Individual	6/9/01

Appendix A

List of Persons, Organizations, and Public Agencies Commenting on the Draft EIS/EIR for the Mid-City/Westside Transit Corridor Project

Comment Ltr Code	*Commmentor*	*Affiliation*	*Type of Affiliation*	*Date*
AH(3)	Havens, Alan D.	None	(6) Individual	6/21/01
SIH(1)	Hawke, Sindy	None	(6) Individual	5/7/01
EH(1)	Healy, Elaine	None	(6) Individual	5/19/01
DH(1)	Heaton, David W.	Westside Village	(6) Individual	6/3/01
MAH(1)	Heaton, Martha J.	Westside Village	(6) Individual	6/3/01
TOMH(1)	Hefner, Tom	None	(6) Individual	
RH(1)	Heinrich, Regina and Paul	None	(6) Individual	6/1/01
ROH(1)	Helfman, Robert	None	(6) Individual	
MIH(1)	Heller, Miranda	None	(6) Individual	6/15/01
SYH(1)	Heller, Sylvia	Wilshire House	(6) Individual	6/8/01
PEH(1)	Hendriks, Peter (Conklin, Shannon)	Westside Village Association	(6) Individual	n/a
DEH(1)	Hilgenberg, Dennis P.	None	(6) Individual	6/10/01
ANH(1)	Hill, Anna	None	(6) Individual	5/22/01
BH(1)	Hillman, Brenda	Westside Village	(6) Individual	6/11/01
BH(2)	Hillman, Brenda	None	(6) Individual	
TH(1)	Hirmand, Tahereh S.	None	(6) Individual	6/3/01
TH(2)	Hirmand, Tahereh S.	None	(6) Individual	6/6/01
JOH(1)	Hoag, John	None	(6) Individual	5/7/01
SH(1)	Hobbs, Stephanie	None	(6) Individual	6/13/01
KH(1)	Holcomb, Kimberly	None	(6) Individual	6/8/01
DAH(1)	Holender, David	Greater Los Angeles Condominium Association	(6) Individual	
ELH(1)	Holl, Eldon and Beverly	None	(6) Individual	6/2/01
BIH(1)	Holliday, Bobby	None	(6) Individual	5/15/01
STH(1)	Hollins, Stephanie	None	(6) Individual	6/14/01
STH(2)	Hollins, Stephanie	Leimert Park Homeowner	(6) Individual	6/11/01
MICHH(1)	Holte, Michael	None	(6) Individual	6/12/01
THH(1)	Holzbog, Thomas J.	None	(6) Individual	5/16/01
CHH(1)	Huang, Chang J.	None	(6) Individual	6/15/01
JOHH(1)	Hummel, John E.	None	(6) Individual	6/11/01
PH(1)	Humphreys, Paul (Crozier - Humphreys, Susan)	None	(6) Individual	6/6/01
DAVH(1)	Hurwin, Davida W.	None	(6) Individual	6/10/01
FH(1)	Hurwin, Frazier M.	None	(6) Individual	6/10/01
IH(1)	Husted, Inez E.	None	(6) Individual	
BRH(1)	Hutchinsx, Brian Q.	None	(6) Individual	
RI(1)	Iannessa, Robert	Grubb & Ellis Management Services, Inc.	(6) Individual	6/12/01
DJ(1)	Jablon, Diane	West of Westwood HOA	(6) Individual	

Appendix A

List of Persons, Organizations, and Public Agencies Commenting on the Draft EIS/EIR for the Mid-City/Westside Transit Corridor Project

Comment Ltr Code	*Commmentor*	*Affiliation*	*Type of Affiliation*	*Date*
DIJ(1)	Jacobs, Diana	None	(6) Individual	5/14/01
NJ(1)	Jaffe, Nancy	Advisory Board of the South Brentweed Homeowner's Association	(6) Individual	5/24/01
HJ(1)	Jahng, Haissok	None	(6) Individual	6/13/01
BJ(1)	Jaimes, Brenton	None	(6) Individual	
PJ(1)	Jamiaas, Philip	None	(6) Individual	
DAVJ(1)	Javelosa, David A.	None	(6) Individual	6/11/01
CJ(1)	Johnson, Craig	None	(6) Individual	
DAJ(1)	Johnson, David	Westwood Garden Civic Organization	(6) Individual	
DAVIJ(1)	Johnson, David	None	(6) Individual	
LJ(1)	Johnston, Lisa G.	None	(6) Individual	5/2/01
LJ(2)	Johnston, Lisa G.	None	(6) Individual	6/6/01
RIJ(1)	Johnston, Richard L.	None	(6) Individual	6/6/01
LIJ(1)	Jones, Lillian R.	None	(6) Individual	6/26/01
MJ(1)	Jones, Mary	None	(6) Individual	6/16/01
JOSE(1)	JOSE1VDLA@aol.com	None	(6) Individual	6/6/01
NIJ(1)	Juarez, Nicandro and Elizabeth	Westwood Gardens Civic Association	(6) Individual	6/15/01
ALK(1)	Kaku, Alice	None	(6) Individual	6/6/01
GK(1)	Kataoka, Grace J.	West Los Angeles Japanese American Citizens League Auxillary	(6) Individual	5/16/01
SHK(1)	Katzer, Sheldon E.	None	(6) Individual	6/8/01
EK(1)	Keller, Esther	None	(6) Individual	
DEK(1)	Kemp, Derek	None	(6) Individual	6/11/01
DK(1)	Kemp, Derek	None	(6) Individual	5/27/01
JK(1)	Kennedy, James D.	None	(6) Individual	6/2/01
MHK(1)	Khalsa, Mha A. [Oaklander, Martha]	None	(6) Individual	4/2/01
JAK(1)	Kidwell, Jan	None	(6) Individual	6/5/01
CK(1)	Kirk, Camille	None	(6) Individual	6/15/01
RK(1)	Kirsten, Robert	None	(6) Individual	6/10/01
SK(1)	Kishi, Stella	West Los Angeles Japanese American Citizens League Auxiliary	(6) Individual	7/6/01
AK(1)	Kivowitz, Alexandra	None	(6) Individual	
ANK(1)	Klebanoff, Anita	None	(6) Individual	
ERK(1)	Korody, Erica	None	(6) Individual	6/1/01
MIK(1)	Koshimoto, Mie	None	(6) Individual	
WK(1)	Kramer, William and Betty	Westside Village Homeowner	(6) Individual	6/6/01

Appendix A

List of Persons, Organizations, and Public Agencies Commenting on the Draft EIS/EIR for the Mid-City/Westside Transit Corridor Project

Comment Ltr Code	*Commmentor*	*Affiliation*	*Type of Affiliation*	*Date*
BK(1)	Krutonog, Boris	West of Westwood HOA	(6) Individual	6/12/01
LUL(1)	La Cotera, Luis and Antonieta	Westside Village Homeowner	(6) Individual	6/13/01
JIL(1)	Lamm, Jim	None	(6) Individual	6/15/01
NL(1)	Lane, Norman	None	(6) Individual	
DL(1)	Lang, David	None	(6) Individual	6/13/01
HL(1)	Lange, Hope	Wilshire House	(6) Individual	6/5/01
EL(1)	Langley-Sudy, Eileen C.	None	(6) Individual	5/14/01
GL(1)	Larcombe, Garron and Cindy	West of Westwood HOA	(6) Individual	
ANL(1)	Larkin, Andy and Jeanne	None	(6) Individual	
BL(1)	Lawson, Beverly	None	(6) Individual	5/22/01
ALE(1)	Leadbetter, A.T.	None	(6) Individual	
CL(1)	Lee, Calvin M.	None	(6) Individual	
RL(1)	Leibowitz, Robert L.	Compassionate Oncology Medical Group	(5) Organization	5/24/01
ROL(1)	Lentz, Robert	None	(6) Individual	6/10/01
LIL(1)	Lesan, Liz	None	(6) Individual	6/11/01
DAL(1)	Levin, Dan	None	(6) Individual	6/14/01
DANL(1)	Levin, Dan	None	(6) Individual	6/10/01
SL(1)	Levin, Sandra J.	East Culver City Neighborhood Alliance	(6) Individual	6/11/01
REBL(1)	Levinson, Rebecca	None	(6) Individual	6/11/01
AL(1)	Levit, Anna	None	(6) Individual	5/8/01
ML(1)	Levit, Marvin	None	(6) Individual	5/8/01
JL(1)	Levy, Jan	None	(6) Individual	6/13/01
HAL(1)	Lewis, Harriet	None	(6) Individual	6/15/01
SCL(1)	Libbey, Scott	None	(6) Individual	7/6/01
JOL(1)	Little, Joan	None	(6) Individual	6/8/01
LL(1)	Lockwood, Lloyd	None	(6) Individual	
ALL(1)	Loncar, Alicia	None	(6) Individual	6/7/01
PL(1)	Lowly, Paul	None	(6) Individual	
MAL(1)	Lowy, Martha	None	(6) Individual	6/2/01
EDL(1)	Luchetti, Ed	None	(6) Individual	6/13/01
ARL(1)	Luebke, Arly and Roberta	Westside Village	(6) Individual	
BAM(1)	Maiten, Barry	None	(6) Individual	5/12/01
JM(1)	Mamer, John W.	Westwood Garden Civic Organization	(6) Individual	
CAM(1)	Manning, Cathy	None	(6) Individual	6/10/01
CATM(1)	Manning, Cathy	None	(6) Individual	6/10/01
MAM(1)	Manning, Margaret	None	(6) Individual	6/10/01

Appendix A

List of Persons, Organizations, and Public Agencies Commenting on the Draft EIS/EIR for the Mid-City/Westside Transit Corridor Project

Comment Ltr Code	*Commmentor*	*Affiliation*	*Type of Affiliation*	*Date*
EM(1)	Maranez, Eddie	None	(6) Individual	
DAM(1)	Margolies, Dany	None	(6) Individual	6/15/01
RM(1)	Mark, Roberta	Wilshire House	(6) Individual	6/11/01
WM(1)	Marks, Walley	None	(6) Individual	6/6/01
WYM(1)	Marlow, Wynn and Robert	None	(6) Individual	6/13/01
LM(1)	Marmol, Leo (Radziner, Ron)	None	(6) Individual	6/12/01
PM(1)	Martin, Paul	Cedars-Sinai Medical Center	(6) Individual	5/16/01
REM(1)	Martin, Reuben	None	(6) Individual	
DM(1)	Mayes, Doug	None	(6) Individual	
JAM(1)	McCain, Jackie	None	(6) Individual	5/23/01
LIM(1)	McCarthy, Liam and Nancy	None	(6) Individual	6/4/01
GM(1)	McCutcheon, George	Westside Village	(6) Individual	5/30/01
PAM(1)	McHugh, Patrick	None	(6) Individual	5/22/01
BILM(1)	Mead, Bill	None	(6) Individual	6/10/01
LOM(1)	Meraj, Loretta	Nelson Shelton	(6) Individual	8/14/01
ROM(1)	Mercer, Robert and Cynthia	None	(6) Individual	
MM(1)	Metcalfe, Mike	None	(6) Individual	
ALM(1)	Milionis, Allison	None	(6) Individual	6/13/01
HM(1)	Mochizuki, Hideko	West Los Angeles Japanese American Citizens League Auxillary	(6) Individual	5/23/01
DOM(1)	Montogomery, Douglas	None	(6) Individual	
CM(1)	Montoya, Celia	None	(6) Individual	
JEM(1)	Morgan, Jess S. and Palma S.	Wilshire House	(6) Individual	6/5/01
CRM(1)	Morioka, Craig and Christine	West of Westwood HOA	(6) Individual	
SM(1)	Morris, Selma	Westside Village	(6) Individual	6/12/01
WIM(1)	Morris, William	None	(6) Individual	5/12/01
ARM(1)	Mortell, Arthur	None	(6) Individual	6/10/01
LAM(1)	Moskowitz, Laura and Strick, David	None	(6) Individual	6/4/01
AM(1)	Moss, Andrew	Westside Village Civic Association	(6) Individual	
CHM(1)	Mountain, Charles	None	(6) Individual	5/11/01
MOWL(1)	mowlby@aol.com	None	(6) Individual	6/4/01
BIM(1)	Moynier, Bill and Bette	Rancho Park	(6) Individual	6/15/01
MIM(1)	Muradian, Michael	None	(6) Individual	
MIM(2)	Muradian, Michael	None	(6) Individual	6/10/01

Appendix A

List of Persons, Organizations, and Public Agencies Commenting on the Draft EIS/EIR for the Mid-City/Westside Transit Corridor Project

Comment Ltr Code	*Commmentor*	*Affiliation*	*Type of Affiliation*	*Date*
SIM(1)	Muraglia, Silvio	Westside Village	(6) Individual	6/6/01
JOM(1)	Myers, Joan	None	(6) Individual	6/14/01
NANC(1)	nancy@courtcharts.com	None	(6) Individual	6/11/01
TN(1)	Nelson, T.A.	None	(6) Individual	
BN(1)	Nesin, Brian	None	(6) Individual	6/12/01
MN(1)	Newman, Myva	West of Westwood HOA	(6) Individual	6/15/01
MN(2)	Newman, Myva	None	(6) Individual	5/21/01
CON(1)	Nguyen, Connie	None	(6) Individual	
TEN(1)	Nichols, Teak	None	(6) Individual	6/12/01
DN(1)	Nofziger, Denise	None	(6) Individual	
CN(1)	Nowak, Chester J.	Westside Village	(6) Individual	6/3/01
IN(1)	Nusbaum, Ilse	None	(6) Individual	6/11/01
IN(2)	Nusbaum, Ilse	None	(6) Individual	4/30/01
EO(1)	O' Rourke, Edward and Catherine	Westside Village	(6) Individual	6/10/01
JO(1)	O' Sullivan, James	None	(6) Individual	6/6/01
DO(1)	Oder, Danila B.	None	(6) Individual	4/13/01
MO(1)	Okamura, Melanie	None	(6) Individual	
RO(1)	Okin, Risa	West of Westwood HOA	(6) Individual	
SO(1)	Okin, Steven	West of Westwood HOA	(6) Individual	
GO(1)	Olsen, George and Lucinda	None	(6) Individual	5/20/01
GAO(1)	Ono, Gary T.	None	(6) Individual	6/11/01
WO(1)	Oppenheimer, Walter	Wilshire House	(6) Individual	6/11/01
MIO(1)	Orlik, Mitch and Barbara	None	(6) Individual	
JUP(1)	Page, Judith	None	(6) Individual	
JP(1)	Page, Judy	None	(6) Individual	
GEOP(1)	Palmer, Geoff	None	(6) Individual	
GEP(1)	Palmer, Geoff	None	(6) Individual	6/14/01
RP(1)	Papet, Roger A.	None	(6) Individual	6/13/01
CP(1)	Parham, Cynthia	None	(6) Individual	
MOP(1)	Pearl, Mollie	None	(6) Individual	6/9/01
IRP(1)	Pedrosa, Iris	None	(6) Individual	
SHP(1)	Pelz, Sharon	None	(6) Individual	6/14/01
SP(1)	Pelz, Sharon	None	(6) Individual	5/4/01
DANP(1)	Pena, Danny	None	(6) Individual	
BP(1)	Perez, Ben	Westwood Garden Civic Organization	(6) Individual	
EP(1)	Perez, Emily	Westwood Garden Civic Organization	(6) Individual	

Appendix A

List of Persons, Organizations, and Public Agencies Commenting on the Draft EIS/EIR for the Mid-City/Westside Transit Corridor Project

Comment Ltr Code	*Commmentor*	*Affiliation*	*Type of Affiliation*	*Date*
EP(2)	Perez, Emily	None	(6) Individual	6/11/01
DOP(1)	Petersen, Dorotha	None	(6) Individual	6/6/01
JOYP(1)	Peterzell, Joyce M.	None	(6) Individual	5/30/01
DAP(1)	Pettijohn, David R.	Rancho Park	(6) Individual	5/25/01
DP(1)	Pettijohn, David R.	None	(6) Individual	5/25/01
PP(1)	Petzi, Paul	None	(6) Individual	6/11/01
LP(1)	Phanstiel, Louise S.	Wilshire House	(6) Individual	6/5/01
JEP(1)	Phillips, Jeri	None	(6) Individual	6/17/01
SUP(1)	Pietsch, Susan	Epilepsy Foundation	(6) Individual	
AP(1)	Plaszewski, Arthur	West of Westwood HOA	(6) Individual	
GP(1)	Plaszewski, Greg	West of Westwood HOA	(6) Individual	
ADEP(1)	Plotkin, Adele	None	(6) Individual	6/15/01
IP(1)	Pomerantz, Irwin	None	(6) Individual	7/9/01
JOP(1)	Powell, Joyce and Larry	None	(6) Individual	6/25/01
INP(1)	Prochazka, Ingeborg	None	(6) Individual	5/11/01
STP(1)	Purcell, Stephanie	None	(6) Individual	
BR(1)	Raineri, Bruno	None	(6) Individual	6/13/01
JR(1)	Raineri, Joyce	None	(6) Individual	6/13/01
JOYR(1)	Raineri, Joyce and Bruno and Noelle	None	(6) Individual	5/17/01
NR(1)	Raineri, Noelle	None	(6) Individual	6/13/01
AR(1)	Ramirez, Anthony	None	(6) Individual	
TER(1)	Ramirez, Teresa	None	(6) Individual	
RR(1)	Rappaport, Ross	Westside Village	(6) Individual	6/8/01
JOAR(1)	Redlich, Joan	None	(6) Individual	6/11/01
ROBR(1)	Rees, Robert	None	(6) Individual	6/13/01
TR(1)	Reichelderfer, Terry A.	None	(6) Individual	5/11/01
JOR(1)	Reichmann, Joseph	None	(6) Individual	6/12/01
MR(1)	Reiner, Martin	Westwood Garden Civic Organization	(6) Individual	
LR(1)	Reisbord, Lesley	None	(6) Individual	6/14/01
SR(1)	Reuben, Susan	None	(6) Individual	6/7/01
ROR(1)	Reyto, Robert	Park Wilshire	(6) Individual	7/3/01
BRR(1)	Rheins, Bruce	None	(6) Individual	
JER(1)	Richmond, Jes and Vicky	None	(6) Individual	
MRO(1)	Robinson, M.	None	(6) Individual	
MARR(1)	Robles, Mary L.	None	(6) Individual	
MARR(2)	Robles, Mary L.	None	(6) Individual	
JONR(1)	Root, Jon	None	(6) Individual	5/1/01

Appendix A

List of Persons, Organizations, and Public Agencies Commenting on the Draft EIS/EIR for the Mid-City/Westside Transit Corridor Project

Comment Ltr Code	*Commmentor*	*Affiliation*	*Type of Affiliation*	*Date*
GR(1)	Rosen, Glen W.	None	(6) Individual	5/9/01
MAR(1)	Rosenfeld, Maxine	None	(6) Individual	6/8/01
ER(1)	Roth, Elizabeth	None	(6) Individual	6/15/01
DR(1)	Rotter, Debby	None	(6) Individual	6/8/01
THR(1)	Rubin, Thomas	None	(6) Individual	6/15/01
BER(1)	Rudick, Bette	None	(6) Individual	
LAR(1)	Rudick, Larry	Westdale Homeowners Association	(6) Individual	
LOR(1)	Ruttenberg, Lorin [Valla, Sean]	None	(6) Individual	5/29/01
GIR(1)	Rutter, Gina	Miracle Mile	(6) Individual	
YS(1)	Sadgat, Yigal and Shevi	None	(6) Individual	6/1/01
BS(1)	Saltzman, Barry	None	(6) Individual	5/15/01
CAS(1)	Salva, Carol	None	(6) Individual	5/25/01
MS(1)	Saucer, Mary-Kathryn	None	(6) Individual	
KES(1)	Sauter, Keith	None	(6) Individual	5/14/01
HS(1)	Scheider, Hans	None	(6) Individual	
JS(1)	Scherr, Josh	None	(6) Individual	
HS(2)	Schieder, Hans	None	(6) Individual	6/5/01
ES(1)	Schuman, Edward E.	None	(6) Individual	6/11/01
LAS(1)	Sefton, Laurie	None	(6) Individual	
SHS(1)	Shallon, Sheldon C.	None	(6) Individual	5/10/01
EUS(1)	Shepard, Eugenia	None	(6) Individual	6/14/01
DAVS(1)	Shoucair, David	None	(6) Individual	5/29/01
LS(1)	Shwimmer, Laura	None	(6) Individual	
DANS(1)	Sias, Dan	None	(6) Individual	6/8/01
JOS(1)	Simon, John	None	(6) Individual	
RES(1)	Simon, Reatha	None	(6) Individual	
JAS(1)	Simpson, Jacquet	None	(6) Individual	6/4/01
STS(1)	Singer, Steve	None	(6) Individual	6/8/01
SAS(1)	Singh, Sarita	None	(6) Individual	6/13/01
DES(1)	Slosberg, Deborah	None	(6) Individual	6/6/01
BRS(1)	Smith, Brenda	None	(6) Individual	
KS(1)	Smith, Kevin	None	(6) Individual	6/6/01
LARS(1)	Smith, Larry	None	(6) Individual	6/11/01
RS(1)	Smith, Ronald	None	(6) Individual	
AS(1)	Snyder, Arthur	None	(6) Individual	
JEAS(1)	Snyder, Jean	None	(6) Individual	
DS(1)	Soegono, Donna	None	(6) Individual	

Appendix A

List of Persons, Organizations, and Public Agencies Commenting on the Draft EIS/EIR for the Mid-City/Westside Transit Corridor Project

Comment Ltr Code	*Commmentor*	*Affiliation*	*Type of Affiliation*	*Date*
JES(1)	Solomon, Jeff	None	(6) Individual	5/11/01
DOMS(1)	Specchierla, Domenico and Marguerite	None	(6) Individual	5/25/01
ROS(1)	Spector, Robin	None	(6) Individual	
CS(1)	Spencer, Caroline M.	None	(6) Individual	6/12/01
SPET(1)	spet@webtv.net	None	(6) Individual	6/14/01
NS(1)	Steiner, Nancy	None	(6) Individual	6/3/01
TS(1)	Stempel, Tom	None	(6) Individual	6/6/01
JOSS(1)	Stephens, Josh	None	(6) Individual	
DAS(1)	Stepsay, David R.	Queensland Manor South Co-op, Inc.	(6) Individual	6/6/01
RHS(1)	Sterart, Rhonda	None	(6) Individual	
ROYS(1)	Steward, Royce E.	None	(6) Individual	6/7/01
ROYS(2)	Steward, Royce E.	None	(6) Individual	6/15/01
CAMS(1)	Stewart, Cameron	Westwood Garden Civic Organization	(6) Individual	
JIS(1)	Stewart, Jim	Southern California Council on Environment and Development	(6) Individual	
PS(1)	Stewart, Pat	None	(6) Individual	
SS(1)	Stewart, Steven	None	(6) Individual	
SUS(1)	Swartz, Sue	None	(6) Individual	
ANS(1)	Szilagyi, Annie	None	(6) Individual	5/22/01
AT(1)	Takeshita, Aiko N.	West Los Angeles Japanese American Citizens League Auxiliary	(6) Individual	5/21/01
GT(1)	Tauber, Ginger	None	(6) Individual	6/1/01
LT(1)	Tauro, Linus and Shannon	None	(6) Individual	6/4/01
MT(1)	Tezanos, Mille	None	(6) Individual	
BT(1)	Thompson, Bill	None	(6) Individual	6/2/01
TT(1)	Tippet, Terri	None	(6) Individual	6/10/01
TT(2)	Tippit, Terri	None	(6) Individual	
TT(3)	Tippit, Terri	None	(6) Individual	5/10/01
ET(1)	Tooley, Eric	None	(6) Individual	6/4/01
TOPA(1)	Topangarik@aol.com	None	(6) Individual	6/10/01
CT(1)	Tracy, Catherine	None	(6) Individual	6/11/01
ERT(1)	Travis, Erik	None	(6) Individual	5/27/01
LIT(1)	Travis, Lisa L.	None	(6) Individual	6/11/01
LIT(2)	Travis, Lisa L.	None	(6) Individual	6/11/01
GIT(1)	Tsao, Gilbert	None	(6) Individual	6/12/01
GIT(2)	Tsao, Gilbert	West of Westwood HOA	(6) Individual	
MAT(1)	Tsurimoto, Mari	None	(6) Individual	5/22/01

Appendix A

List of Persons, Organizations, and Public Agencies Commenting on the Draft EIS/EIR for the Mid-City/Westside Transit Corridor Project

Comment Ltr Code	*Commmentor*	*Affiliation*	*Type of Affiliation*	*Date*
LAT(1)	Tunberg, Laura	None	(6) Individual	6/7/01
KT(1)	Turning, Kate	None	(6) Individual	6/13/01
ST(1)	Twining, Steve	Hillside Federation	(6) Individual	6/13/01
BRT(1)	Tyler, Brian	None	(6) Individual	
JU(1)	Ulloth, John	None	(6) Individual	
UNREAD(01)	Unreadable	None	(6) Individual	
UNREAD(02)	Unreadable	None	(6) Individual	n/a
UNREAD(03)	Unreadable	None	(6) Individual	6/12/01
UNREAD(05)	Unreadable	West of Westwood HOA	(6) Individual	
UNREAD(06)	Unreadable	Westside Village	(6) Individual	6/6/01
UNREAD(07)	Unreadable	West Los Angeles Japanese American Citizens League Auxillary	(6) Individual	5/2/01
UNREAD(08)	Unreadable	Westside Village	(6) Individual	6/11/01
UNREAD(09)	Unreadable	Westside Village	(6) Individual	6/6/01
UNREAD(10)	Unreadable	None	(6) Individual	
UNREAD(11)	Unreadable	None	(6) Individual	6/9/01
UNREAD(12)	Unreadable	None	(6) Individual	
UNREAD(13)	Unreadable	West of Westwood HOA	(6) Individual	
UNREAD(14)	Unreadable	West Los Angeles Japanese American Citizens League Auxillary	(6) Individual	
UNREAD(15)	Unreadable	West Los Angeles Japanese American Citizens League Auxillary	(6) Individual	5/17/01
UNREAD(16)	Unreadable	West Los Angeles Japanese American Citizens League Auxillary	(6) Individual	5/31/01
UNREAD(17)	Unreadable	None	(6) Individual	6/14/01
UNREAD(18)	Unreadable	Designs Limited	(6) Individual	5/29/01
UNREAD(19)	Unreadable	None	(6) Individual	6/22/01
UNREAD(20)	Unreadable	West of Westwood HOA	(6) Individual	
UNREAD(21)	Unreadable	Westwood Garden Civic Organization	(6) Individual	
UNREAD(22)	Unreadable	Wilshire House	(6) Individual	6/11/01
UNREAD(23)	Unreadable	None	(6) Individual	6/4/01
UNREAD(24)	Unreadable	None	(6) Individual	
UNREAD(24)	Unreadable	None	(6) Individual	5/29/01
UNREAD(25)	Unreadable	None	(6) Individual	5/22/01
UNREAD(26)	Unreadable	None	(6) Individual	5/18/01
UNREAD(27)	Unreadable	None	(6) Individual	
UNREAD(28)	Unreadable	None	(6) Individual	6/8/01
UNREAD(29)	Unreadable	None	(6) Individual	

Appendix A

List of Persons, Organizations, and Public Agencies Commenting on the Draft EIS/EIR for the Mid-City/Westside Transit Corridor Project

Comment Ltr Code	*Commmentor*	*Affiliation*	*Type of Affiliation*	*Date*
UNREAD(30)	Unreadable	West Los Angeles Japanese American Citizens League Auxiliary	(6) Individual	5/15/01
UNREAD(31)	Unreadable	West of Westwood HOA	(6) Individual	
UNREAD(32)	Unreadable	None	(6) Individual	6/13/01
UNREAD(33)	Unreadable	West Los Angeles Japanese American Citizens League Auxiliary	(6) Individual	
UNREAD(35)	Unreadable	None	(6) Individual	
UNREAD(36)	Unreadable	None	(6) Individual	
UNREAD(37)	Unreadable	None	(6) Individual	
UNREAD(38)	Unreadable	None	(6) Individual	
UNREAD(39)	Unreadable	None	(6) Individual	
UNREAD(4)	Unreadable	Westwood Garden Civic Organization	(6) Individual	
UNREAD(41)	Unreadable	None	(6) Individual	
UNREAD(42)	Unreadable	None	(6) Individual	
UNREAD(43)	Unreadable	None	(6) Individual	
UNREAD(44)	Unreadable	None	(6) Individual	
UNREAD(45)	Unreadable	None	(6) Individual	
UNREAD(46)	Unreadable	None	(6) Individual	
UNREAD(47)	Unreadable	None	(6) Individual	
UNREAD(48)	Unreadable	None	(6) Individual	
UNREAD(49)	Unreadable	None	(6) Individual	
UNREAD(50)	Unreadable	None	(6) Individual	
UNREAD(51)	Unreadable	None	(6) Individual	
UNREAD(52)	Unreadable	None	(6) Individual	
UNREAD(53)	Unreadable	None	(6) Individual	
UNREAD(54)	Unreadable	None	(6) Individual	
JAU(1)	Urmston, Jane	None	(6) Individual	5/7/01
JAU(2)	Urmston, Jane	None	(6) Individual	6/4/01
YV(1)	Valentin, Yvan and Catia	West Side Village	(6) Individual	5/31/01
PA(1)	van Allen, Philip	None	(6) Individual	5/26/01
MV(1)	Varah, Monica	None	(6) Individual	6/10/01
BW(1)	Various	None	(6) Individual	6/14/01
FV(1)	Verger, Florence	None	(6) Individual	5/8/01
JV(1)	Villanueva, Julian	None	(6) Individual	
DW(1)	Walker, Daniel	None	(6) Individual	
DW(2)	Walker, Daniel	None	(6) Individual	
PW(1)	Walker, Patrick	None	(6) Individual	
MARIW(1)	Wallace, Marie	None	(6) Individual	5/14/01

Appendix A

List of Persons, Organizations, and Public Agencies Commenting on the Draft EIS/EIR for the Mid-City/Westside Transit Corridor Project

Comment Ltr Code	*Commmentor*	*Affiliation*	*Type of Affiliation*	*Date*
CW(1)	Wang, Chunsing	None	(6) Individual	6/12/01
EW(1)	Wang, Esther	None	(6) Individual	6/11/01
LW(1)	Wang, Leon	None	(6) Individual	6/10/01
MEW(1)	Wang, Meiyin	None	(6) Individual	6/10/01
RW(1)	Wang, Robert J.	None	(6) Individual	6/13/01
RAW(1)	Ward, Ramey	None	(6) Individual	
SW(1)	Watanabe, Satoshi and Satomi	None	(6) Individual	6/27/01
HEW(1)	Waterman, Heather	None	(6) Individual	3/8/01
NW(1)	Watt, Nadine	Wilshire House	(6) Individual	6/8/01
MIW(1)	Webber, Michael	None	(6) Individual	6/10/01
ALW(1)	Weeks, Alan K.	None	(6) Individual	6/8/01
SAW(1)	Weil, Sally	None	(6) Individual	5/23/01
AMW(1)	Weiss, Amy	None	(6) Individual	
JW(1)	Weiss, Jonathan	None	(6) Individual	
KAW(1)	Weiss, Karen P.	None	(6) Individual	6/11/01
DAW(1)	Westlake, Dawn	Miracle Mire Residential Association	(6) Individual	
GW(1)	White, Gregg B. (Brzechwa-White, Alicja)	None	(6) Individual	6/15/01
AW(1)	Wieland, Alexis [Mercer, Annette]	None	(6) Individual	6/8/01
PAMW(1)	Wilkes, Pamela	None	(6) Individual	
JOW(1)	Williams, Joe and Joy	None	(6) Individual	6/9/01
LEW(1)	Wimmer, Leslie	Westside Village	(6) Individual	6/4/01
JIW(1)	Wise, Jim and Kim	Westside Village	(6) Individual	6/2/01
KW(1)	Wittenberg, Kevin	None	(6) Individual	6/11/01
ROW(1)	Wiviott, Robert W.	Wilshire House	(6) Individual	6/1/01
MAW(1)	Wolfe, Mable	None	(6) Individual	5/17/01
MW(1)	Wolfe, Mable	None	(6) Individual	
ERW(1)	Wolfson-Sagot, Eric	None	(6) Individual	5/29/01
JEW(1)	Wolin, Jeffrey	None	(6) Individual	6/15/01
HW(1)	Wong, Helen	None	(6) Individual	
HW(2)	Wong, Helen	None	(6) Individual	
HW(3)	Wong, Helen	None	(6) Individual	
HW(4)	Wong, Helen	None	(6) Individual	
HW(5)	Wong, Helen	None	(6) Individual	
SUW(1)	Woo, Susanna	None	(6) Individual	6/12/01
TW(1)	Woods, Tom	None	(6) Individual	6/6/01

Appendix A

List of Persons, Organizations, and Public Agencies Commenting on the Draft EIS/EIR for the Mid-City/Westside Transit Corridor Project

Comment Ltr Code	*Commmentor*	*Affiliation*	*Type of Affiliation*	*Date*
PATW(1)	Wooldrige, Patty	None	(6) Individual	5/29/01
WW(1)	Wright, Wayne	None	(6) Individual	
COW(1)	Wustman, Constance	None	(6) Individual	6/8/01
MARW(1)	Wyatt, Margaret	None	(6) Individual	5/1/01
LESW(1)	Wynn, Leslie	None	(6) Individual	6/15/01
KY(1)	Yaghoubzadeh, Khosrow	None	(6) Individual	6/13/01
WY(1)	Yeager, Will	None	(6) Individual	6/13/01
JY(1)	Yelaca, Jack and Martha	None	(6) Individual	6/5/01
PY(1)	Young, Patricia	None	(6) Individual	6/2/01
DZ(1)	Zajac, Diane	None	(6) Individual	
GZ(1)	Zandt, Gary V.	None	(6) Individual	6/10/01
RZ(1)	Zelden, Roxie	None	(6) Individual	
R0Z(1)	Zelder, Robert	None	(6) Individual	
BZ(1)	Zwolinski, Bob	None	(6) Individual	6/13/01
		Petitions		
PA(1)	Petition A	None	(7) Various	6/13/01
PB(1)	Petition B	None	(7) Various	
PC(1)	Petition C	None	(7) Various	
PD(1)	Petition D	None	(7) Various	
PE(1)	Petition E	None	(7) Various	6/11/01
PF(1)	Petition F	None	(7) Various	6/12/01
PG(1)	Petition G	None	(7) Various	6/15/01
PH(1)	Petition H	None	(7) Various	6/15/01
PI(1)	Petition I	None	(7) Various	
PK(1)	Petition K	None	(7) Various	
PL(1)	Petition L	None	(7) Various	
PM(1)	Petition M	None	(7) Various	6/12/01
		Public TestimonyTranscripts		
T(1)	Booth, Mary	None	(6) Individual	5/7/01
T(1)	Nicholson, Pete	None	(6) Individual	5/7/01
T(1)	Rosner, Woody	None	(6) Individual	5/7/01
T(1)	Clark, Rudyard	None	(6) Individual	5/7/01
T(1)	Regan, Ralston	None	(6) Individual	5/7/01
T(1)	Wines, Leonard	None	(6) Individual	5/7/01
T(1)	Campbell, Bruce	None	(6) Individual	5/7/01
T(1)	Bettger, Frank	Friends For Expo	(5) Organization	5/7/01
T(1)	Twining, Steve	None	(6) Individual	5/7/01
T(1)	Babcock, Vaughn	None	(6) Individual	5/7/01

Appendix A

List of Persons, Organizations, and Public Agencies Commenting on the Draft EIS/EIR for the Mid-City/Westside Transit Corridor Project

Comment Ltr Code	*Commmentor*	*Affiliation*	*Type of Affiliation*	*Date*
T(1)	Jutila, Lauri	None	(6) Individual	5/7/01
T(1)	Sookman, Scott	None	(6) Individual	5/7/01
T(1)	Cheeseboro, Robert	None	(6) Individual	5/7/01
T(1)	Bradshaw, Linda	None	(6) Individual	5/7/01
T(1)	Bell Hurst, Patricia	None	(6) Individual	5/7/01
T(1)	Buegoff, Elana	None	(6) Individual	5/7/01
T(1)	Rhodes, Richard	None	(6) Individual	5/7/01
T(1)	Gabbard, Dana	None	(6) Individual	5/7/01
T(1)	Mark, Eli	None	(6) Individual	5/7/01
T(1)	Sprott, Rod	a Presbyterian Church	(5) Organization	5/7/01
T(1)	Alpern, Kenneth	None	(6) Individual	5/7/01
T(1)	Slade, Milton	None	(6) Individual	5/7/01
T(1)	Ryan, Thomas	None	(6) Individual	5/7/01
T(1)	Luchette, Edward	None	(6) Individual	5/7/01
T(1)	Walker, Daniel	Sierra Club Transportation Committee	(5) Organization	5/7/01
T(1)	Ford, Chris	None	(6) Individual	5/7/01
T(1)	Mullins, Bill	None	(6) Individual	5/7/01
T(1)	Tille, Richard	None	(6) Individual	5/7/01
T(1)	Maccaferri, Nikola	None	(6) Individual	5/7/01
T(1)	Lane, Norman	None	(6) Individual	5/7/01
T(1)	Wall, Dave	None	(6) Individual	5/7/01
T(1)	Hawke, Sindy	None	(6) Individual	5/7/01
T(1)	Dunn, Joseph	None	(6) Individual	5/7/01
T(1)	Spencer, Carol	None	(6) Individual	5/7/01
T(1)	Schieder, Hans	None	(6) Individual	5/7/01
T(1)	Friedman, Alexander	None	(6) Individual	5/7/01
T(1)	Gilman, Jane	Largemont Blvd	(5) Organization	5/7/01
T(1)	Koesil, Ely	None	(6) Individual	5/7/01
T(1)	Waters, Rich	None	(6) Individual	5/7/01
T(1)	Root, Jon	None	(6) Individual	5/7/01
T(1)	Sacks, Nate	None	(6) Individual	5/7/01
T(2)	Freund, John	None	(6) Individual	5/9/01
T(2)	Ivory, Nelle	None	(6) Individual	5/9/01
T(2)	Adelman, Charles	None	(6) Individual	5/9/01
T(2)	Hampton, Garnett	None	(6) Individual	5/9/01
T(2)	Washington, America	None	(6) Individual	5/9/01
T(2)	Chinn, Keisha	None	(6) Individual	5/9/01
T(2)	Burroughs, Presley	None	(6) Individual	5/9/01

Appendix A

List of Persons, Organizations, and Public Agencies Commenting on the Draft EIS/EIR for the Mid-City/Westside Transit Corridor Project

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T(2)	Jackson, Evenlean	None	(6) Individual	5/9/01
T(2)	Cheeseboro, Robert	None	(6) Individual	5/9/01
T(2)	Burton, Alvan	None	(6) Individual	5/9/01
T(2)	Simmons, Clint	None	(6) Individual	5/9/01
T(2)	McCullough, Patrick	None	(6) Individual	5/9/01
T(2)	Clarke, Tony	None	(6) Individual	5/9/01
T(2)	Nunez, Cecilia	None	(6) Individual	5/9/01
T(2)	Cervantes, Evelia	None	(6) Individual	5/9/01
T(2)	Yount, Opal	None	(6) Individual	5/9/01
T(2)	Aguilar, Frederico	None	(6) Individual	5/9/01
T(2)	Helfman, Robert	None	(6) Individual	5/9/01
T(2)	Surles, Lady	None	(6) Individual	5/9/01
T(2)	Wooten, Patricia	None	(6) Individual	5/9/01
T(2)	Blaney, Elizabeth	Neighbors for an Improved Community	(5) Organization	5/9/01
T(2)	Wilkerson, Paulette	Neighbors for an Improved Community	(5) Organization	5/9/01
T(2)	Smith, Jimmy	None	(6) Individual	5/9/01
T(2)	Vazquez, Martha	Residents for an Improved Community	(5) Organization	5/9/01
T(2)	Vizcarra, Luz	None	(6) Individual	5/9/01
T(2)	Macedonio, Rogelio	Trinity Block Club	(5) Organization	5/9/01
T(2)	Elizariasus, Raul	None	(6) Individual	5/9/01
T(2)	Reed, Bart	None	(6) Individual	5/9/01
T(2)	Walker, Daniel	None	(6) Individual	5/9/01
T(2)	Salazar, Jesus	None	(6) Individual	5/9/01
T(2)	Daley, Ted	None	(6) Individual	5/9/01
T(2)	Root, Jon	None	(6) Individual	5/9/01
T(2)	Seno, Lisa	None	(6) Individual	5/9/01
T(2)	Alpern, Dennis	None	(6) Individual	5/9/01
T(3)	Regan, Ralston	None	(6) Individual	5/13/01
T(3)	Morris, Marlina	None	(6) Individual	5/13/01
T(3)	Lash, Gloria	None	(6) Individual	5/13/01
T(3)	Christensen, Roger	None	(6) Individual	5/13/01
T(3)	Alschuler, Walter	None	(6) Individual	5/13/01
T(3)	Wallace, Marie	None	(6) Individual	5/13/01
T(3)	Wing, Damon	None	(6) Individual	5/13/01
T(3)	Davis, Russ	None	(6) Individual	5/13/01
T(3)	Zwolinski, Rob	None	(6) Individual	5/13/01
T(3)	Kelly, Matt	None	(6) Individual	5/13/01
T(3)	Bond, Teresa	None	(6) Individual	5/13/01

Appendix A

List of Persons, Organizations, and Public Agencies Commenting on the Draft EIS/EIR for the Mid-City/Westside Transit Corridor Project

Comment Ltr Code	*Commmentor*	*Affiliation*	*Type of Affiliation*	*Date*
T(3)	Winters, Joan	None	(6) Individual	5/13/01
T(3)	Rubin, Martin	None	(6) Individual	5/13/01
T(3)	Becktold, Tom	None	(6) Individual	5/13/01
T(3)	Mautino, Robert	None	(6) Individual	5/13/01
T(3)	Kline, Leona	None	(6) Individual	5/13/01
T(3)	Rhodes, Deborah	None	(6) Individual	5/13/01
T(3)	Bettger, Frank	None	(6) Individual	5/13/01
T(3)	Mantell, Greg	None	(6) Individual	5/13/01
T(3)	Cheeseboro, Robert	None	(6) Individual	5/13/01
T(3)	Pincus, Arnold	None	(6) Individual	5/13/01
T(3)	Gillette, Lisa	None	(6) Individual	5/13/01
T(3)	Clarke, Darrell	None	(6) Individual	5/13/01
T(3)	Root, Jon	None	(6) Individual	5/13/01
T(3)	Moss, Andrew	None	(6) Individual	5/13/01
T(3)	Marks, Pamela	None	(6) Individual	5/13/01
T(3)	Holdorff, Cindy	None	(6) Individual	5/13/01
T(3)	Alpern, Kenneth	None	(6) Individual	5/13/01
T(3)	Clarke, Virginia	None	(6) Individual	5/13/01
T(3)	Seal, Kathy	Friends 4 Expo Transit	(6) Individual	5/13/01
T(3)	Ray, Marilyn	None	(6) Individual	5/13/01
T(3)	Javaluyas, Johanna	None	(6) Individual	5/13/01
T(3)	Cardenas, Raymond	None	(6) Individual	5/13/01
T(3)	Weber, Christof	None	(6) Individual	5/13/01
T(3)	Paterson, Tom	Holmby-Westwood Property Owners Association	(5) Organization	5/13/01
T(3)	Maher, Julia	Friends 4 Expo Transit	(5) Organization	5/13/01
T(3)	Rucker, Allen	None	(6) Individual	5/13/01
T(3)	Rudick, Roger	None	(6) Individual	5/13/01
T(3)	Kidwell, Jan	None	(6) Individual	5/13/01
T(3)	Elliott, Phyllis	None	(6) Individual	5/13/01
T(3)	Block, Donna	None	(6) Individual	5/13/01
T(3)	Lancaster, Linda	None	(6) Individual	5/13/01
T(3)	Waters, R.	None	(6) Individual	5/13/01
T(3)	Zablen, Nate	None	(6) Individual	5/13/01
T(3)	Walker, Daniel	None	(6) Individual	5/13/01
T(3)	Corcio, Jamie	None	(6) Individual	5/13/01
T(3)	Ward, Ken	None	(6) Individual	5/13/01
T(3)	Saunders, Jason	None	(6) Individual	5/13/01
T(3)	Reed, Bart	None	(6) Individual	5/13/01

Appendix A

List of Persons, Organizations, and Public Agencies Commenting on the Draft EIS/EIR for the Mid-City/Westside Transit Corridor Project

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T(3)	Shepard, Eugenia	None	(6) Individual	5/13/01
T(3)	Glasser, Elan	None	(6) Individual	5/13/01
T(3)	Goldman, Michael	None	(6) Individual	5/13/01
T(3)	Pederson, Ben	None	(6) Individual	5/13/01
T(3)	Ingalls, Chris	None	(6) Individual	5/13/01
T(3)	Fishel, Allen	None	(6) Individual	5/13/01
T(3)	Cole, Belle	None	(6) Individual	5/13/01
T(3)	Nesin, Brian	None	(6) Individual	5/13/01
T(3)	Hurley, Shawn	Hines, a real estate firm in Santa Monica	(5) Organization	5/13/01
T(3)	Alschuler, Selma	None	(6) Individual	5/13/01
T(3)	Ito, Kathy	None	(6) Individual	5/13/01
T(3)	Stewart, Jim	Southern California Counsel on Environment& Development	(5) Organization	5/13/01
T(3)	Jayulloth, John	None	(6) Individual	5/13/01
T(3)	Metcalfe, Mike	None	(6) Individual	5/13/01
T(3)	Hutchings, Brian Quincy	None	(6) Individual	5/13/01
T(3)	Zaragoza, Marta	East Culver City Neighborhood Alliance	(5) Organization	5/13/01
T(3)	Howald, Brian	None	(6) Individual	5/13/01
T(3)	Velasquez, Raul	Latino Urban Forum	(5) Organization	5/13/01
T(3)	Shieder, Hans	None	(6) Individual	5/13/01
T(3)	Lyon, Harriette	None	(6) Individual	5/13/01
T(3)	Dafesh, Philip	None	(6) Individual	5/13/01
T(3)	Kravetz, Erik	None	(6) Individual	5/13/01
T(3)	Brown, Stacy	None	(6) Individual	5/13/01

APPENDIX B COMPREHENSIVE LIST OF COMMENTS AND TYPE OF RESPONSE PROVIDED

Appendix B
Comprehensive List of Comments and Type of Response Provided

Comment Letter	Comment	Type of Response: Individual	Topical	Standard
FEMA(1)	1			A
FEMA(1)	2	•		
FEMA(1)	3	•		
FEMA(1)	4	•		
FEMA(1)	5			A
USDOI(1)	1			A
USDOI(1)	2	•		
USDOI(1)	3	•		
USDOI(1)	4			D
USDOI(1)	5	•		
USDOI(1)	6	•		
USDOI(1)	7	•		
USDOI(1)	8			D
USDOI(1)	9			A
USDOT(1)	1			A
USDOT(1)	2			C
USDOT(1)	3			A
USEPA(1)	1			A
USEPA(1)	2			A
USEPA(1)	3			A
USEPA(1)	4			B
USEPA(1)	5			D
USEPA(1)	6			A
USEPA(1)	7			A
USEPA(1)	8			A
USEPA(1)	9			D
USEPA(1)	10			E
USEPA(1)	11	•		
USEPA(1)	12			D
USEPA(1)	12A	•		
USEPA(1)	13			D
USEPA(1)	14			D
USEPA(1)	15			D
USEPA(1)	16			E
USEPA(1)	17			E
USEPA(1)	18			D
USEPA(1)	19			B
USEPA(1)	20	•		
CADFG(1)	1			A
CADFG(1)	2			E
CADFG(1)	3			D
CADFG(1)	4			A
CADFG(1)	5			A
CADOT(1)	1			A
CADOT(1)	2			C
CADOT(1)	3	•		
CADOT(1)	4			D
CADOT(1)	5			D
CADOT(1)	6			A
CADOT(1)	7			C
CADOT(1)	8			C
CADOT(1)	9			A
CATC(1)	1			C
CATC(1)	2			A
MTA(1)	1			A
OPR (1)	1			A
OPR (1)	2			A
OPR (1)	3			A
OPR(2)	1			A
OPR(2)	2			C
OPR(2)	3			A
CLAFD(1)	1			A
CLAFD(1)	2			A
CLAFD(1)	3	•		
CLAFD(1)	4	•		
CLAFD(1)	5			D
CLAFD(1)	6	•		
CLAFD(1)	7			A
CLAFD(1)	8			A
LACPW(1)	1			A
LACPW(1)	2			A
LACPW(1)	3	•		
LACPW(1)	4			A
LACPW(1)	5			A
LACSD(1)	1			A
LACSD(1)	2			D
LACSD(1)	3			A
LAUSD(1)	1			A
LAUSD(1)	2	•		
LAUSD(1)	3			D
LAUSD(1)	4			D
LAUSD(1)	5			D
LAUSD(1)	6			D
LAUSD(1)	7			D
LAUSD(1)	8			D
LAUSD(1)	9			D
LAUSD(1)	10			D
LAUSD(1)	11			D
LAUSD(1)	12		C	
LAUSD(1)	13		C	
LAUSD(1)	14	•		
LAUSD(1)	15			D

Comment Letter	Comment	Type of Response: Individual	Topical	Standard
LAUSD(1)	16			D
LAUSD(1)	17			D
LAUSD(1)	18	•		
LAUSD(1)	19	•		
LAUSD(1)	20	•		
LAUSD(1)	21	•		
LAUSD(1)	22	•		
LAUSD(1)	23	•		
LAUSD(1)	24	•		
LAUSD(1)	25		B	
LAUSD(1)	26	•		
LAUSD(1)	27			A
LAUSD(2)	1			A
LAUSD(2)	2			D
LAUSD(2)	3			A
LAUSD(2)	4			D
LAUSD(2)	5			A
LAUSD(3)	1	•		
LAUSD(3)	2			D
LAUSD(3)	3			D
LAUSD(3)	4			D
LAUSD(3)	5			D
LAUSD(3)	6			E
LAUSD(3)	7	•		
LAUSD(3)	8	•		
LAUSD(3)	9	•		
LAUSD(3)	10	•		
LAUSD(3)	11	•		
LAUSD(3)	12	•		
LAUSD(3)	13	•		
LAUSD(3)	14	•		
LAUSD(3)	15	•		
LAUSD(3)	16	•		
LAUSD(3)	17	•		
LAUSD(4)	1			A
LAUSD(4)	2			A
LAUSD(4)	3	•		
LAUSD(4)	4	•		
LAUSD(4)	5			D
LAUSD(5)	1			A
LAUSD(5)	2			E
LAUSD(5)	3			D
LAUSD(5)	4	•		
LAUSD(5)	5			D
LAUSD(5)	6			D
LAUSD(5)	7	•		
LAUSD(5)	8			D
LAUSD(5)	9			D
LAUSD(5)	10			D
LAUSD(5)	11			D
LAUSD(5)	12			D
LAUSD(5)	13			D
LAUSD(5)	14			D
LAUSD(5)	15			D
LAUSD(5)	16			D
LAUSD(5)	17			D
LAUSD(5)	18			D
LAUSD(5)	19			D
LAUSD(5)	20			D
LAUSD(5)	21			D
LAUSD(5)	22			D
LAUSD(5)	23			D
LAUSD(5)	24			D
LAUSD(5)	25			D
LAUSD(5)	26			D
LAUSD(5)	27			D
LAUSD(5)	28			A
LAUSD(5)	29			D
LAUSD(5)	30			D
LAUSD(5)	31			D
LAUSD(5)	32		A	
LAUSD(5)	33	•		
LAUSD(5)	34			E
LAUSD(5)	35			E
LAUSD(5)	36	•		
LAUSD(5)	37			D
LAUSD(5)	38	•		
LAUSD(5)	39			D
LAUSD(5)	40			D
LAUSD(5)	41			D
LAUSD(5)	42			C
LAUSD(5)	43			D
LAUSD(5)	44			D
LAUSD(5)	45	•		
LAUSD(5)	46	•		
LAUSD(5)	47	•		
LAUSD(5)	48	•		
NHM(1)	1			A
NHM(1)	2			A
NHM(1)	3			D
NHM(1)	4			A
SCAG(1)	1			D
SCAG(1)	2			A
SCAG(1)	3			A
SCAG(1)	4			A
SCAG(1)	5			A
SCAG(1)	6			A
SCAG(1)	7	•		
SCAG(1)	8			A
SCAG(1)	9			C
SCAG(1)	10	•		
SCAG(1)	11			A
SCAG(1)	12			C
SCAG(1)	13			C

Comment Letter	Comment	Type of Response: Individual	Topical	Standard
SCAG(1)	14			C
SCAG(1)	15			C
SCAG(1)	16			C
SCAG(1)	17			C
SCAG(1)	18			C
SCAG(1)	19			C
SCAG(1)	20			A
SCAG(1)	21			C
SCAG(1)	22			C
SCAG(1)	23			C
SCAG(1)	24			A
SCAG(1)	25			A
SCAG(1)	26			A
SCAG(1)	27			C
SCAG(1)	28			C
SCAG(1)	29			C
SCAG(1)	30			C
SCAG(1)	31			C
SCAG(1)	32			C
SCAG(1)	33			C
SCAG(1)	34			C
SCAG(1)	35			C
SCAG(1)	36			A
SCAG(1)	37			C
SCAG(1)	38			C
SCAG(1)	39			C
SCAG(1)	40			A
SCAG(1)	41			C
SCAG(1)	42	•		
SCAG(1)	43			C
SCAG(1)	44			C
SCAG(1)	45	•		
SCAG(1)	46			A
SCAG(2)	1			A
SCAG(2)	2			A
SCAG(2)	3			D
SCAG(2)	4			D
SCAG(2)	5			D
SCAG(2)	6			D
SCAG(2)	7			D
SCAG(2)	8			D
SCAG(2)	9			D
SCAG(2)	10			D
SCAG(2)	11			D
SCAG(2)	12			D
SCAG(2)	13			C
SCAG(2)	14			D
SCAG(2)	15			D
SCAG(2)	16			E
SCAG(2)	17			D
SCAG(2)	18			D
SCAG(2)	19			D
SCAG(2)	20			D
SCAG(2)	21			D
SCAG(2)	22			D
SCAG(2)	23			D
SCAG(2)	24			D
SCAG(2)	25			D
SCAG(2)	26			D
SCAG(2)	27			D
SCAG(2)	28			D
CBH(1)	1			A
CBH(1)	2			A
CBH(1)	3			D
CBH(1)	4	•		
CBH(1)	5	•		
CBH(1)	6	•		
CBH(1)	7	•		
CBH(1)	8	•		
CBH(1)	9		C	
CBH(1)	10	•		
CBH(1)	11	•		
CBH(1)	12	•		
CBH(1)	13	•		
CBH(1)	14	•		
CBH(1)	15	•		
CBH(1)	16			D
CBH(1)	17	•		
CBH(1)	18	•		
CBH(2)	1			A
CBH(2)	2			C
CBH(2)	3			D
CBH(2)	4			D
CBH(2)	5	•		
CBH(2)	6		C	
CBH(2)	7	•		
CCC(1)	1			A
CCC(1)	2			D
CCC(1)	3			D
CCC(1)	4			D
CCC(1)	5			D
CCC(1)	6			D
CCC(1)	7			D
CCC(1)	8			D
CCC(1)	9			D
CCC(1)	10			D
CCC(1)	11			D
CCC(1)	12			D
CCC(1)	13			D
CCC(1)	14			D
CCC(1)	15			D
CCC(1)	16			D
CCC(1)	17			D
CCC(1)	18	•		

Comment Letter	Comment	Type of Response: Individual	Topical	Standard
CCC(1)	19			D
CCC(1)	20			D
CCC(1)	21			D
CCC(1)	22			D
CCC(1)	23			D
CCC(1)	24			D
CCC(1)	25			D
CCC(1)	26	•		
CCC(1)	27	•		
CCC(1)	28			D
CCC(1)	29			D
CCC(1)	30			D
CCC(1)	31			D
CCC(1)	32			D
CCC(1)	33			D
CCC(1)	34			D
CCC(1)	35			D
CCC(1)	36			D
CCC(1)	37			D
CCC(1)	38			D
CCC(1)	39			D
CCC(1)	40			D
CCC(1)	41			D
CCC(1)	42			D
CCC(1)	43	•		
CCC(1)	44			D
CCC(1)	45			D
CCC(1)	46			D
CCC(1)	47			D
CCC(1)	48			D
CCC(1)	49			D
CCC(1)	50			D
CCC(1)	51			D
CCC(1)	52			D
CCC(1)	53			D
CCC(1)	54			D
CCC(1)	55			D
CCC(1)	56			D
CCC(1)	57			D
CCC(1)	58			D
CCC(1)	59			D
CCC(1)	60			D
CCC(1)	61			D
CCC(1)	62			D
CCC(1)	63			D
CCC(1)	64			D
CCC(1)	65			D
CCC(1)	66			D
CCC(1)	67			D
CCC(1)	68			D
CCC(1)	69			D
CCC(1)	70			D
CCC(1)	71			D
CCC(1)	72			D
CCC(1)	73			D
CCC(1)	74			D
CCC(1)	75			D
CCC(1)	76			C
CCC(1)	77			C
CLA(1)	1	•		
CLA(1)	2	•		
CLA(1)	3	•		
CLA(1)	4	•		
CLA(1)	5	•		
CLA(1)	6	•		
CLA(1)	7	•		
CLA(1)	8	•		
CLA(1)	9	•		
CLA(1)	10	•		
CLA(1)	11			E
CLA(1)	12			E
CLA(1)	13			E
CLA(1)	14	•		
CLA(1)	15	•		
CLA(1)	16			D
CLA(1)	17	•		
CLA(1)	18			E
CLA(1)	19	•		
CLA(1)	20		C	
CLA(1)	21	•		
CLA(1)	22	•		
CLA(1)	23	•		
CLA(1)	24			D
CLA(1)	25			D
CLA(1)	26			D
CLA(1)	27		A	
CLA(1)	28	•		
CLA(1)	29	•		
CLA(1)	30	•		
CLA(1)	31			E
CLA(1)	32			D
CLA(1)	33			A
CLA(1)	34	•		
CLA(1)	35	•		
CLA(1)	36			
CLA(1)	37			D
CLA(1)	38			B
CLA(1)	39		A	
CLA(1)	40			C
CLA(1)	41			C
CLA(1)	42			C
CLA(1)	43	•		
CLA(1)	44			A
CLA(1)	45			A

Comment Letter	Comment	Type of Response: Individual	Topical	Standard
CLA(1)	46	•		
CLA(1)	47			C
CLA(1)	48	•		
CLA(1)	49	•		
CLA(1)	50	•		
CLA(1)	51	•		
CLA(1)	52			E
CLA(1)	53			E
CLA(1)	54			E
CLA(1)	55			E
CLA(1)	56			E
CLA(1)	57	•		
CLA(1)	58	•		
CLA(1)	59			D
CLA(1)	60			D
CLA(1)	61			D
CLA(1)	62			D
CLA(1)	63			D
CLA(1)	64			D
CLA(1)	65			D
CLA(1)	66			D
CLA(1)	67			D
CLA(1)	68			D
CLA(1)	69			D
CLA(1)	70			D
CLA(1)	71			D
CLA(1)	72			D
CLA(1)	73			D
CLA(1)	74			D
CLA(1)	75			D
CLA(1)	76			D
CLA(1)	77			D
CLA(1)	78			D
CLA(1)	79			D
CLA(1)	80	•		
CLA(1)	81	•		
CLA(1)	82	•		
CLA(1)	83			C
CLA(1)	84			C
CLA(1)	85			D
CLA(1)	86			D
CLA(1)	87	•		
CLA(1)	88	•		
CLA(1)	89	•		
CLA(1)	90	•		
CLA(1)	91	•		
CLA(1)	92	•		
CLA(1)	93	•		
CLA(1)	95	•		
CLA(1)	96	•		
CLA(1)	97			D
CLA(1)	98	•		
CLA(1)	99	•		
CLA(1)	100			E
CLA(1)	101			E
CLA(1)	102			E
CLA(1)	103			E
CLA(1)	104			E
CLA(1)	105	•		
CLA(1)	106			E
CLA(1)	107			D
CLA(1)	108	•		
CLA(1)	109			E
CLA(1)	110	•		
CLA(1)	111			E
CLA(1)	112	•		
CLA(1)	113	•		
CLA(1)	114	•		
CLA(1)	115	•		
CLA(1)	116	•		
CLA(1)	117	•		
CLA(1)	118	•		
CLA(1)	119	•		
CLA(1)	120			E
CLA(1)	121			E
CLA(1)	122			E
CLA(1)	123			E
CLA(1)	124			B
CLA(1)	125	•		
CLA(1)	126	•		
CLA(1)	127	•		
CLA(1)	128			C
CLA(1)	129	•		E
CLA(1)	130			D
CLA(1)	131			D
CLA(1)	132			E
CLA(1)	133	•		
CLA(1)	134	•		
CLA(1)	135	•		
CLA(1)	136	•		
CLA(1)	137			C
CLA(1)	138			D
CLA(1)	139	•		
CLA(1)	140			D
CLA(1)	141		C	
CLA(1)	142	•		
CLA(1)	143	•		
CLA(1)	144	•		
CLA(1)	145	•		
CLA(1)	146	•		
CLA(1)	147	•		
CLA(1)	148			D
CLA(1)	149			E
CLA(1)	150			E

Comment Letter	Comment	Type of Response: Individual	Topical	Standard
CLA(1)	151			E
CLA(1)	152			E
CLA(1)	153			E
CLA(1)	154			E
CLA(1)	155			E
CLA(1)	156			E
CLA(1)	157			E
CLA(1)	158			E
CLA(1)	159			E
CLA(1)	160			E
CLA(1)	161			E
CLA(1)	162			E
CLA(1)	163			E
CLA(1)	164			E
CLA(1)	165			D
CLA(1)	166			D
CLA(1)	167			D
CLA(1)	168			D
CLA(1)	169			D
CLA(1)	170			D
CLA(1)	171			D
CLA(1)	172			D
CLA(1)	173			D
CLA(1)	174			D
CLA(1)	175			D
CLA(1)	176			D
CLA(1)	177			D
CLA(1)	178			D
CLA(1)	179			D
CLA(1)	180			D
CLA(1)	181			D
CLA(1)	182			D
CLA(1)	183			D
CLA(1)	184			D
CLA(1)	185			D
CLA(1)	186			D
CLA(1)	187			D
CLA(1)	188			D
CLA(1)	189			D
CLA(1)	190			D
CLA(1)	191			D
CLA(1)	192			D
CLA(1)	193			D
CLA(1)	194			D
CLA(1)	195			A
CLA(1)	196			A
CLA(1)	197			A
CLA(1)	198			A
CLA(1)	199			A
CLA(1)	200			A
CLA(1)	201	•		
CLA(1)	202	•		
CLA(2)	1			A
CLA(2)	2			D
CLA(2)	3			D
CLA(2)	4			C
CLA(2)	5			D
CLA(2)	6			B
CLA(2)	7			B
CLA(3)	1			A
CLA(3)	2	•		
CLA(3)	3			D
CLA(3)	4	•		
CLA(3)	5			D
CLA(3)	6			D
CLA(3)	7	•		
CLA(3)	8	•		
CLA(3)	9	•		
CLA(3)	10	•		
CLA(3)	11	•		
CLA(3)	12	•		
CLA(3)	13	•		
CLA(3)	14	•		
CLA(3)	15	•		
CLA(3)	16			D
CLA(3)	17			D
CLA(3)	18			E
CLA(3)	19			D
CLA(3)	20			D
CLA(3)	21	•		
CLA(3)	22		A	
CLA(3)	23	•		
CLA(3)	24	•		
CLA(3)	25			D
CLA(3)	26			E
CLA(3)	27			D
CLA(3)	28	•		
CLA(3)	29			D
CLA(3)	30			D
CLA(3)	31			E
CLA(3)	32	•		
CLA(3)	33			A
CLA(3)	34	•		
CLA(3)	35		D	
CRALA(1)	1			A
CRALA(1)	2			A
CRALA(1)	3	•	D	
CRALA(1)	4			B
CRALA(1)	5			B
CRALA(1)	6	•		
CRALA(1)	7			A
CRALA(1)	8	•		
CRALA(1)	9			E
CRALA(1)	10			E

Comment Letter	Comment	Type of Response: Individual	Topical	Standard
CRALA(1)	11			E
CRALA(1)	12			E
CRALA(1)	13			E
CRALA(1)	14			E
CRALA(1)	15			E
CRALA(1)	16	•		
CRALA(1)	17			D
CRALA(1)	18			D
CRALA(1)	19			D
CRALA(1)	20			D
CRALA(1)	21			B
CRALA(1)	22			D
CRALA(1)	23			B
CRALA(1)	24			B
CRALA(1)	25			A
CSM(1)	1			A
CSM(1)	2			D
CSM(1)	3			E
CSM(1)	4			A
CSM(1)	5			D
CSM(1)	6			D
CSM(1)	7			D
CSM(1)	8	•	B,C	
CSM(1)	9	•		
CSM(1)	10			E
CSM(2)	1			A

Comment Letter	Comment	Type of Response: Individual	Topical	Standard
CSM(2)	2			D
CSM(2)	3			D
CSM(2)	4			E
CSM(2)	5			E
CSM(2)	6			E
CSM(2)	7	•		
CSM(2)	8	•	B,C	
CSM(2)	9			E
CSM(2)	10			E
CSM(2)	11			E
CSM(2)	12			E
CSM(2)	13			E
CSM(2)	14			B
CSM(2)	15			D
CSM(2)	16			B
CSM(2)	17			E
CSM(2)	18			A
EDC(1)	1			A
EDC(1)	2			A
EDC(1)	3			A
EDC(1)	4			D
EDC(1)	5			D
EDC(1)	6			D
EDC(1)	7			D
EDC(1)	8			A
EDC(1)	9			D

Comment Letter	Comment	Type of Response: Individual	Topical	Standard
LACC(1)	1			A
LACC(2)	1			A
LACC(2)	2			A
LACC(2)	3			D
LACC(2)	4			D
LACC(2)	5			D
LACC(2)	6			D
LACC(2)	7			D
LACC(2)	8			A
LACC(3)	1			A
LACC(3)	2			D
LACC(3)	3			D
LACC(3)	4			D
LACC(3)	5			D
LACC(3)	6			D
LACC(3)	7			D
LACC(3)	8			D
LACC(3)	9			D
LACC(3)	10			D
LACC(3)	11			D
LACC(3)	12			D
LACC(3)	13			D
LACC(3)	14			D
LACC(3)	15			D
LACC(3)	16			A
AAA(1)	1			A

Comment Letter	Comment	Type of Response: Individual	Topical	Standard
AAA(1)	2			A
AAA(1)	3	•		
AAA(1)	4	•		
AAA(1)	5			D
AAA(1)	6			E
AAA(1)	7			C
AAA(1)	8			D
AAA(1)	9			A
AAA(1)	10	•		
AAA(1)	11	•		
AAA(1)	12			D
AAA(1)	13			D
AAA(1)	14			D
AAA(1)	15			A
BOMA(1)	1			B
BOMA(1)	2			A
BOMA(1)	3			B
BOMA(1)	4			C
BOMA(1)	5			E
BOMA(1)	6	•		
BOMA(1)	7	•		
BOMA(1)	8	•		
BOMA(1)	9	•		
BOMA(1)	10			E
BOMA(1)	11			D
BRU(1)	1	•		

Comment Letter	Comment	Type of Response: Individual	Topical	Standard
BRU(1)	2	•	D	
BRU(1)	3	•		
BRU(1)	4	•		
BRU(1)	5	•		
BRU(1)	6			D
BRU(1)	7			A
CCALA(1)	1			A
CCALA(1)	2			A
CCALA(1)	3			D
CCALA(1)	4			D
CCALA(1)	5			A
CEN(1)	1			A
CEN(1)	2			D
CEN(1)	3			A
CEN(1)	4			D
CEN(1)	5	•		
CEN(1)	6			D
CEN(1)	7			D
CEN(1)	8			C
CEN(1)	9			D
CEN(1)	10			D
CEN(1)	11			D
CEN(1)	12			D
CEN(1)	13			A
CSC(1)	1			A
CSC(1)	2			A
CSC(1)	3			A
CSC(1)	4			D
CSC(1)	5			D
CSC(1)	6			D
CSC(1)	7			D
CSC(1)	8			D
CSC(1)	9			D
CWTS(1)	1			A
CWTS(1)	2			A
CWTS(1)	3			E
CWTS(1)	4			E
CWTS(1)	5			A
DARA(1)	1			E
DARA(1)	2			D
DARA(1)	3	•		
DARA(1)	4			E
FCP(1)	1			A
FCP(1)	2			D
FCP(1)	3			D
FCP(1)	4			D
FCP(1)	5			D
FCP(1)	6			D
FCP(1)	7			D
FCP(1)	8			D
FCP(1)	9			D
FCP(1)	10			D
FCP(1)	11			D
FCP(1)	12			D
FCP(1)	13			D
FET(1)	1			D
FET(1)	2			D
FET(1)	3			D
FET(1)	4			D
FET(1)	5			A
FET(1)	6			A
FET(1)	7			A
FET(1)	8			D
FET(1)	9			D
FET(1)	10			D
FET(1)	11			D
FET(1)	12			D
FET(1)	13			D
FET(1)	14			D
FET(1)	15			D
FET(1)	16			D
FET(1)	17			D
FET(1)	18			D
FET(1)	19			D
FET(1)	20			D
FET(1)	21			D
FET(1)	22			D
FET(1)	23			D
FET(1)	24			D
FET(1)	25			D
FET(1)	26			D
FET(1)	27			D
FET(1)	28			D
FET(1)	29			E
FET(1)	30			D
FET(1)	31			D
FET(1)	32			D
FET(1)	33			D
FET(1)	34			D
FET(1)	35			D
FET(1)	36			D
FET(1)	37			D
FET(1)	38			D
FET(1)	39			D
FET(1)	40			D
FET(1)	41			D
FET(1)	42			D
FET(1)	43			D
FET(1)	44			D
FET(1)	45			D
FET(1)	46			D
FET(1)	47			D
FET(1)	48			D
FET(1)	49			D

Comment Letter	Comment	Type of Response: Individual	Topical	Standard
FET(1)	50			D
FET(1)	51			D
FET(1)	52			D
FET(1)	53			D
FET(1)	54			D
FET(1)	55			D
FET(1)	56			D
FET(1)	57			D
FET(1)	58			D
FET(1)	59			D
FET(1)	60			D
FET(1)	61			D
FET(1)	62			D
FET(1)	63			D
FET(1)	64			D
FET(1)	65			D
FET(1)	66			D
FET(1)	67			D
FET(1)	68			E
FET(1)	69			D
FET(1)	70			D
FET(1)	71			D
FET(1)	72			D
FET(1)	73			D
FET(1)	74			D
FET(1)	75			D
FET(1)	76			D
FET(1)	77			D
FET(1)	78			D
FET(1)	79			D
FET(1)	80			D
FET(1)	81			A
FET(1)	82			A
FET(1)	83			A
FET(1)	84	•		
FET(1)	85	•		
FET(1)	86	•		
FET(1)	87			A
FET(1)	88	•		
FET(1)	89			B
FET(1)	90			E
FET(1)	91	•		
FET(1)	92			B
FET(1)	93	•		
FET(1)	94	•		
FET(1)	95	•		
FET(1)	96			A
GO(1)	1			D
GO(1)	2			D
GO(1)	3	•		
GO(1)	4			A
HWPOA(1)	1			A
HWPOA(1)	2			A
HWPOA(1)	3			E
HWPOA(1)	4			C
HWPOA(1)	5			A
HWPOA(1)	6			C
HWPOA(1)	7			C
HWPOA(1)	8	•		
HWPOA(1)	9			B
HWPOA(1)	10			D
HWPOA(1)	11	•		
HWPOA(1)	12			B
HWPOA(1)	13			A
HWPOA(1)	14			A
HWPOA(1)	15	•		
HWPOA(1)	16	•		
HWPOA(1)	17	•		
HWPOA(1)	18	•		
HWPOA(1)	19			B
HWPOA(1)	20			A
HWPOA(1)	21			A
JA(1)	1			A
JA(1)	2			A
JA(1)	3	•		
JA(1)	4	•		
JA(1)	5			A
JA(1)	6			B
JA(1)	7			D
JA(1)	8	•		
JA(1)	9	•		
JA(1)	10			D
JA(1)	11			D
JA(1)	12			D
JA(1)	13			D
JA(1)	14			A
JA(1)	15			D
JA(1)	16			D
JA(1)	17			B
JA(1)	18	•		
JA(1)	19	•		
JA(1)	20	•		
JA(1)	21			D
JA(1)	22			D
JA(1)	23			D
JA(1)	24			D
JACLA(1)	1			A
JACLA(1)	2			D
JACLA(1)	3			D
JACLA(1)	4			C
JACLA(1)	5			D
JACLA(1)	6			D
JACLA(1)	7			D
JACLA(1)	8			D

Comment Letter	Comment	Type of Response: Individual	Topical	Standard
JACLA(1)	9			D
JACLA(1)	10			D
JACLA(1)	11			D
JACLA(1)	12			D
JACLA(1)	13			D
JACLA(1)	14			B
JACLA(1)	15			A
KR(1)	1			A
KR(1)	2			A
KR(1)	3			A
KR(1)	4			D
KR(1)	5			D
KR(1)	6			D
KR(1)	7			D
KR(1)	8			A
LACBC(1)	1			A
LACBC(1)	2			D
LACBC(1)	3			A
LACBC(1)	4			D
LACBC(1)	5			D
LACBC(1)	6			D
LACBC(1)	7			D
LACBC(1)	8			D
LACBC(1)	9			D
LACBC(1)	10			D
LACBC(1)	11			D

Comment Letter	Comment	Type of Response: Individual	Topical	Standard
LACBC(1)	12			A
LACBC(1)	13			D
LACBC(1)	14			D
LACBC(1)	15			D
LACBC(1)	16			D
LACBC(1)	17			D
LACBC(1)	18			D
LACBC(1)	19			D
LACBC(1)	20			D
LACBC(1)	21			D
LACBC(1)	22			D
LACBC(1)	23			D
LACBC(1)	24			D
LACBC(1)	25			D
LACBC(1)	26			D
LACBC(1)	27			D
LACBC(1)	28			D
LACBC(1)	29			D
LACBC(1)	30			D
LACBC(1)	31			D
LACBC(1)	32			D
LACBC(1)	33			D
LACBC(1)	34			D
LACBC(1)	35			D
LACBC(1)	36			D
LACBC(1)	37			D

Comment Letter	Comment	Type of Response: Individual	Topical	Standard
LACBC(1)	38			D
LACBC(1)	39			D
LACBC(1)	40			D
LACBC(1)	41			D
LACBC(1)	42			D
LACBC(1)	43			D
LACBC(1)	44			D
LACBC(1)	45			D
LACBC(1)	46			D
LACBC(1)	47			D
LACBC(1)	48			D
LACBC(1)	49			D
LACBC(1)	50			D
LACGC(1)	1			A
LACGC(1)	2			D
LACGC(1)	3			D
LACGC(1)	4			A
LUF(1)	1			D
LUF(1)	2			A
LUF(1)	3			D
MCPAC(1)	1			A
MCPAC(1)	2			A
OIAKF(1)	1			A
OIAKF(1)	2			D
OIAKF(1)	3			D
OIAKF(1)	4			D

Comment Letter	Comment	Type of Response: Individual	Topical	Standard
OIAKF(1)	5			D
OIAKF(1)	6			D
OIAKF(1)	7			D
OIAKF(1)	8			A
OIAKF(1)	9			A
PWHA(1)	1			B
PWHA(1)	2		B	
PWHA(1)	3			E
PWHA(1)	4		C	
PWHA(1)	5	•		
PWHA(1)	6	•		
PWHA(1)	7			C
PWHA(1)	8	•		
PWHA(1)	9			E
PWHA(1)	10			D
PWHA(1)	11			E
PWHA(1)	12			D
SC(1)	1			A
SC(1)	2			A
SC(1)	3			D
SC(1)	4			D
SC(1)	5			D
SC(1)	6			D
SC(1)	7			D
SC(1)	8			D
SC(1)	9			D

Comment Letter	Comment	Type of Response: Individual	Topical	Standard
SC(1)	10			D
SC(1)	11			D
SC(1)	12			D
SC(1)	13			D
SC(1)	14	•		
SC(1)	15			D
SC(1)	16			A,D
SMCOC(1)	1			D
SMCOC(1)	2			D
SMCOC(1)	3			D
SPPC(1)	1			D
SPPC(1)	2			D
SPPC(1)	3			D
SPPC(1)	4			D
SPPC(1)	5			D
SPPC(1)	6			A,D
TNA(1)	1			A
TNA(1)	2			D
TNA(1)	3			D
TNA(1)	4			A
TNA(1)	5			D
TP(1)	1			D
TT(1)	1			A
TT(1)	2			A
TT(1)	3			D
TT(1)	4			A

Comment Letter	Comment	Type of Response: Individual	Topical	Standard
TT(1)	5			D
TT(1)	6			D
TT(1)	7			D
TT(1)	8			D
TT(1)	9			D
TT(1)	10			D
TT(1)	11			A
TT(1)	12			A
TT(1)	13			A
WAC(1)	1			A
WAC(1)	2			B
WAC(1)	3			A
WAC(1)	4			D
WAC(1)	5			C
WAC(1)	6	•		
WAC(1)	7			A
WAC(1)	8			A
WAC(1)	9			A
WAC(1)	10			E
WAC(1)	11			E
WAC(1)	12			A
WAC(1)	13			A
WCA(1)	1			B
WCA(1)	2		B	
WCA(1)	3			E
WCA(1)	4			

Comment Letter	Comment	Type of Response: Individual	Topical	Standard
WCA(1)	5	•		
WCA(1)	6	•		
WCA(1)	7			C
WCA(1)	8	•		
WCA(1)	9			E
WCA(1)	10			D
WCA(1)	11			E
WCA(1)	12	•	D	
WHA(1)	1	•		
WHA(1)	2		B	
WHA(1)	3		B,C	
WHA(1)	4			
WHA(1)	5	•		
WHA(1)	6	•		
WHA(1)	7	•		
WHA(1)	8	•		
WHA(1)	9			D
WHA(1)	10			A
WT(1)	1			E
WT(1)	2		C	
WT(1)	3	•		
WT(1)	4			E
WVCA(1)	1			A
WVCA(1)	2			D
WVCA(1)	3			D
WVCA(1)	4			D

Comment Letter	Comment	Type of Response: Individual	Topical	Standard
WVCA(1)	5			D
WVCA(1)	6			D
WVCA(1)	7			D
WVCA(1)	8			A
AA(1)	1			D
AA(1)	2			D
AA(2)	1			D
AA(2)	2			D
AA(2)	3			D
AA(2)	4			D
AA(2)	5			D
AA(2)	6			D
AA(2)	7			D
AA(2)	8			A
AA(2)	9			D
AB(1)	1			A
AB(1)	2			A
AB(1)	3			D
AB(1)	4			D
AB(1)	5			D
AB(1)	6			B
AB(1)	7			C
AB(1)	8			A
AC(1)	1			A
AC(1)	2			D
AC(1)	3			A

Comment Letter	Comment	Type of Response: Individual	Topical	Standard
AC(1)	4			D
AC(1)	5			D
AC(1)	6			D
AC(1)	7			B
AC(1)	8			C
AC(1)	9			A
AC(2)	1			D
AC(2)	2			D
AC(2)	3			D
AC(2)	4			C
AC(2)	5			D
AC(2)	6			D
ADA(1)	1			C
ADA(1)	2	•		
ADA(1)	3	•		
ADA(1)	4			B
ADC(1)	1			D
ADEP(1)	1			D
ADEP(1)	2			D
ADEP(1)	3			D
AE(1)	1			A
AE(1)	2			D
AE(1)	3			D
AE(1)	4			B
AE(1)	5			D
AE(1)	6			D

Comment Letter	Comment	Type of Response: Individual	Topical	Standard
AF(1)	1			D
AF(1)	2			A,D
AF(1)	3			B
AF(1)	4			D
AF(1)	5			D
AF(1)	6			D
AG(1)	1			B
AG(1)	2			D
AG(1)	3			B
AG(1)	4			B
AH(1)	1			A,D
AH(1)	2			A
AH(1)	3			B
AH(1)	4			B
AH(1)	5			A
AH(1)	6			E
AH(1)	7	•		
AH(1)	8			A
AH(1)	9			B
AH(1)	10			D
AH(1)	11			D
AH(1)	12			D
AH(1)	13			D
AH(1)	14			A
AH(1)	15			D
AH(1)	16			D

Comment Letter	Comment	Type of Response: Individual	Topical	Standard
AH(1)	17			D
AH(1)	18			D
AH(1)	19			D
AH(1)	20			D
AH(2)	1			A,D
AH(2)	2			A
AH(2)	3			A
AH(2)	4			A
AH(2)	5			D
AH(2)	6			D
AH(2)	7			D
AH(2)	8			E
AH(2)	9			D
AHA(1)	1	•		
AHA(1)	2			D
AHA(1)	3			D
AHA(1)	4			D
AK(1)	1			A
AK(1)	2			B
AK(1)	3			B
AK(1)	4			D
AK(1)	5			A
AL(1)	1			A
AL(1)	2	•		
AL(1)	3	•		
AL(1)	4	•		

Comment Letter	Comment	Type of Response: Individual	Topical	Standard
AL(1)	5			C
ALC(1)	1			B
ALC(1)	2			E
ALC(1)	3			B
ALC(1)	4		B	
ALE(1)	1			A
ALE(1)	2			A
ALE(1)	3			D
ALE(1)	4			D
ALE(1)	5			D
ALE(1)	6			B
ALE(1)	7			C
ALE(1)	8			A
ALEK(1)	1			D
ALEK(1)	2			A
ALEK(1)	3			D
ALF(1)	1			B
ALF(1)	2			C
ALF(1)	3			D
ALF(1)	4			A
ALF(1)	5			D
ALF(1)	6			B
ALF(1)	7			D
ALF(1)	8			B
ALF(1)	9			B
ALF(1)	10			B

Comment Letter	Comment	Type of Response: Individual	Topical	Standard
ALF(1)	11	•		
ALF(1)	12			B
ALF(1)	13			D
ALF(1)	14			B
ALF(1)	15			D
ALF(1)	16			A
ALF(1)	17			A
ALF(2)	1			A
ALF(2)	2			D
ALF(2)	3			D
ALF(2)	4			D
ALF(2)	5			B
ALF(2)	6			D
ALF(2)	7			A
ALF(2)	8			A
ALK(1)	1			A
ALK(1)	2			A
ALK(1)	3			D
ALK(1)	4			D
ALK(1)	5			A
ALL(1)	1			D
ALL(1)	2			D
ALL(1)	3			A
ALM(1)	1			A
ALM(1)	2			D
ALM(1)	3			D

Comment Letter	Comment	Type of Response: Individual	Topical	Standard
ALM(1)	4			E
ALM(1)	5			D
ALM(1)	6			D
ALM(1)	7			D
ALW(1)	1			A
ALW(1)	2			A
ALW(1)	3			A
ALW(1)	4			B
ALW(1)	5			D
ALW(1)	6	•		
ALW(1)	7			D
ALW(1)	8			D
ALW(1)	9			D
ALW(1)	10			D
ALW(1)	11			B
ALW(1)	12	•		
ALW(1)	13			A
ALW(1)	14			D
ALW(1)	15			B
ALW(1)	16			D
ALW(1)	17		D	
ALW(1)	18			A
AM(1)	1			D
AM(1)	2			D
AM(1)	3			D
AMW(1)	1			D

Comment Letter	Comment	Type of Response: Individual	Topical	Standard
AMW(1)	2			D
ANC(1)	1			D
ANC(1)	2		D	
ANC(1)	3			B
ANC(1)	4			A
ANG(1)	1			D
ANG(1)	2			A
ANH(1)	1			A
ANH(1)	2			D
ANH(1)	3			D
ANH(1)	4			A
ANK(1)	1			A
ANK(1)	2			B
ANK(1)	3		A	
ANK(1)	4		A	
ANK(1)	5			A
ANL(1)	1			D
ANL(1)	2			D
ANNC(1)	1			A
ANNC(1)	2			D
ANNC(1)	3			A
ANNC(1)	4			D
ANNC(1)	5			D
ANNC(1)	6			D
ANNC(1)	7			B
ANNC(1)	8			C

Comment Letter	Comment	Type of Response: Individual	Topical	Standard
ANNC(1)	9			A
ANON(01)	1			A
ANON(01)	2			A
ANON(02)	1	•		
ANON(02)	2		C	
ANON(02)	3	•		
ANON(02)	4	•		
ANON(03)	1			B
ANON(03)	2			B
ANON(03)	3			D
ANON(04)	1			D
ANON(04)	2			D
ANON(04)	3			A
ANON(05)	1			B
ANON(05)	2			D
ANON(05)	3			B
ANON(06)	1			A
ANON(06)	2			D
ANON(06)	3			D
ANON(06)	4			A
ANON(07)	1			D
ANON(07)	2			D
ANON(08)	1			A
ANON(08)	2			A
ANON(09)	1			D
ANON(09)	2			D

Comment Letter	Comment	Type of Response: Individual	Topical	Standard
ANON(10)	1			D
ANON(10)	2			D
ANON(11)	1			D
ANON(11)	2			B
ANON(12)	1			E
ANON(12)	2	•		
ANON(12)	3		A	
ANON(12)	4		B	
ANON(12)	5			D
ANON(13)	1			C
ANON(13)	2			C
ANON(14)	1			A
ANON(14)	2			D
ANON(15)	1			D
ANON(16)	1			D
ANON(16)	2			D
ANON(16)	3			B
ANON(17)	1			D
ANON(17)	2			D
ANON(17)	3			B
ANON(18)	1			A
ANON(19)	1			D
ANON(19)	2			D
ANON(19)	3			B
ANON(20)	1			D
ANON(20)	2			D

Comment Letter	Comment	Type of Response: Individual	Topical	Standard
ANON(20)	3			D
ANON(21)	1			D
ANON(22)	1	•		
ANON(23)	*			
ANON(24)	1			A
ANON(24)	2			D
ANON(24)	3			D
ANON(25)	1			A
ANON(25)	2			A
ANON(26)	1			A
ANON(26)	2			A
ANON(26)	3			C
ANON(26)	4			A
ANS(1)	1			D
AODC(1)	1			D
AP(1)	1			A
AP(1)	2			D
AP(1)	3			A
AP(1)	4			D
AP(1)	5			D
AP(1)	6			D
AP(1)	7			B
AP(1)	8			C
AP(1)	9			A
AR(1)	1			D
AR(1)	2			D

Comment Letter	Comment	Type of Response: Individual	Topical	Standard
ARF(1)	1			B
ARF(1)	2			D
ARL(1)	1			D
ARL(1)	2			D
ARL(1)	3			D
ARL(1)	4			A
ARM(1)	1			D
AS(1)	1			A
AS(1)	2			A
AS(1)	3			D
AS(1)	4			D
AS(1)	5			D
AS(1)	6			B
AS(1)	7			C
AS(1)	8			A
AT(1)	1			A
AT(1)	2			D
AT(1)	3	•		
AT(1)	4			A
AUNT(1)	1			D
AW(1)	1			A
AW(1)	2			D
AW(1)	3			A,D
AW(1)	4			D
AW(1)	5			B
AW(1)	6			D

Comment Letter	Comment	Type of Response: Individual	Topical	Standard
AW(1)	7			D
AW(1)	8			D
AW(1)	9	•		
AW(1)	10			B
AW(1)	11			A
AW(1)	12	•		
AW(1)	13			A
AW(1)	14	•		
AW(1)	15			A
AW(1)	16	•		
AW(1)	17			A
AW(1)	18			A
AW(1)	19			D
AW(1)	20			C
AW(1)	21			D
AW(1)	22	•		
AW(1)	23			D
AW(1)	24			D
AW(1)	25			A
AW(1)	26			D
AW(1)	27			A
AW(1)	28	•		
AW(1)	29			D
AW(1)	30			D
BA(1)	1			D
BA(1)	2			C

Comment Letter	Comment	Type of Response: Individual	Topical	Standard
BA(1)	3			D
BA(1)	4			D
BA(1)	5			D
BA(1)	6			B
BAB(1)	1			D
BAM(1)	1			D
BAM(1)	2			D
BB(1)	1			D
BB(1)	2			D
BC(1)	1			A
BC(1)	2			D
BEG(1)	1			B
BEG(1)	2	•		
BER(1)	1			D
BER(1)	2			D
BER(1)	3			A
BER(1)	4			D
BF(1)	1			D
BF(1)	2			D
BF(1)	3			E
BF(1)	4	•		
BF(1)	5	•		
BG(1)	1			A
BG(1)	2			D
BG(1)	3			D
BG(1)	4			D

Comment Letter	Comment	Type of Response: Individual	Topical	Standard
BG(1)	5			D
BG(1)	6			D
BG(1)	7			A
BGR(1)	1			D
BGR(1)	2			D
BGR(1)	3			C
BH(1)	1			A
BH(1)	2			A
BH(1)	3			E
BH(1)	4			D
BH(1)	5			D
BH(1)	6			D
BH(1)	7			D
BH(1)	8			D
BH(2)	1			A
BH(2)	2			D
BH(2)	3			B
BH(2)	4			D
BH(2)	5			D
BIH(1)	1			D
BIH(1)	2			C
BIH(1)	3			D
BIH(1)	4			D
BIH(1)	5			D
BIH(1)	6			D
BIH(1)	7			D

Comment Letter	Comment	Type of Response: Individual	Topical	Standard
BIH(1)	8			D
BILM(1)	1			D
BIM(1)	1			A
BIM(1)	2			D
BIM(1)	3			A
BJ(1)	1			A
BJ(1)	2			A
BJ(1)	3			D
BJ(1)	4			D
BJ(1)	5			D
BJ(1)	6			B
BJ(1)	7			C
BJ(1)	8			A
BK(1)	1			A
BK(1)	2			D
BK(1)	3			A
BK(1)	4			D
BK(1)	5			D
BK(1)	6			D
BK(1)	7			B
BK(1)	8			C
BK(1)	9			A
BL(1)	1			D
BL(1)	2			A
BL(1)	3			D
BL(1)	4			D

Comment Letter	Comment	Type of Response: Individual	Topical	Standard
BL(1)	5			D
BL(1)	6			B
BN(1)	1			A
BN(1)	2			D
BN(1)	3			D
BN(1)	4			D
BN(1)	5			D
BN(1)	6			D
BN(1)	7			D
BN(1)	8			D
BP(1)	1			A
BP(1)	2			A
BP(1)	3			D
BP(1)	4			D
BP(1)	5			D
BP(1)	6			B
BP(1)	7			C
BP(1)	8			A
BR(1)	1			A
BR(1)	2			A
BR(1)	3			D
BR(1)	4			D
BR(1)	5			D
BR(1)	6			B
BR(1)	7			C
BR(1)	8			A

Comment Letter	Comment	Type of Response: Individual	Topical	Standard
BRAH(1)	1			A
BRAH(1)	2			D
BRAH(1)	3			D
BRAH(1)	4			D
BRAH(1)	5			D
BRAH(1)	6		D	
BRB(1)	1			D
BRB(1)	2			B
BRB(1)	3			A
BRB(1)	4			B
BRB(1)	5			A
BRF(1)	1			A
BRF(1)	2			D
BRF(1)	3			A
BRF(1)	4			A
BRH(1)	1			D
BRH(1)	2			B
BRH(1)	3			D
BRH(1)	4			B
BRR(1)	1			A
BRR(1)	2		B	
BRR(1)	3		D	
BRS(1)	1			A
BRS(1)	2			A
BRS(1)	3			D
BRS(1)	4			D
BRS(1)	5			D
BRT(1)	1			D
BRT(1)	2			B
BS(1)	1			D
BS(1)	2			D
BS(1)	3			C
BS(1)	4			D
BS(1)	5			A
BT(1)	1			A
BW(1)	1			D
BW(1)	2			D
BW(1)	3			A
BZ(1)	1			A
BZ(1)	2			A
BZ(1)	3			B
BZ(1)	4			B
BZ(1)	5			B
BZ(1)	6			D
BZ(1)	7			D
BZ(1)	8			B
BZ(1)	9			D
BZ(1)	10			B
BZ(1)	11			D
CA(1)	1			A
CA(1)	2			A
CA(1)	3			A
CA(1)	4			A
CAA(1)	1			D
CAA(1)	2			D
CAA(1)	3			D
CAA(1)	4			D
CAB(1)	1			D
CAB(1)	2			B
CAB(1)	3			D
CAB(1)	4			A
CAB(1)	5			D
CAB(1)	6			A
CAF(1)	1			A
CAF(1)	2		A,C	
CAF(1)	3		B	
CAF(1)	4			A
CAM(1)	1			A,D
CAM(1)	2			A
CAM(1)	3			D
CAM(1)	4			D
CAM(1)	5			B
CAM(1)	6			D
CAM(1)	7			A
CAMS(1)	1			A
CAMS(1)	2			A
CAMS(1)	3			D
CAMS(1)	4			D
CAMS(1)	5			D
CAMS(1)	6			B
CAMS(1)	7			C
CAMS(1)	8			A
CARA(1)	1			D
CARA(1)	2			D
CARB(1)	1			A
CARB(1)	2			A,D
CARB(1)	3			A,D
CARB(1)	4			D
CARB(1)	5			A,D
CAS(1)	1			D
CAS(1)	2			D
CAS(1)	3			A
CATF(1)	1			A,D
CATF(1)	2			D
CATF(1)	3			D
CATF(1)	4			D
CATF(1)	5			A
CATM(1)	1			A,D
CATM(1)	2			D
CATM(1)	3			D
CATM(1)	4			A
CB(1)	1			D
CB(1)	2			D
CC(1)	1			D

Comment Letter	Comment	Type of Response: Individual	Topical	Standard
CC(1)	2			D
CC(1)	3			B
CC(1)	4			B
CE(1)	1			A
CE(1)	2	•		
CE(1)	3	•		
CE(1)	4	•		
CE(1)	5			C
CE(1)	6	•		
CE(1)	7	•		
CE(1)	8			C
CE(1)	9	•		
CE(1)	10	•		
CE(1)	11		B	
CE(1)	12		B	
CE(1)	13		B	
CE(1)	14			A
CE(1)	15			A
CE(1)	16	•		
CE(1)	17			A
CE(1)	18	•		
CE(1)	19	•		
CE(1)	20			A
CE(1)	21	•		
CE(1)	22	•		
CE(1)	23			B

Comment Letter	Comment	Type of Response: Individual	Topical	Standard
CEA(1)	1			A
CEA(1)	2			D
CEA(1)	3			D
CEA(1)	4			A
CF(1)	1			D
CF(1)	2			D
CF(1)	3			D
CF(1)	4			D
CF(1)	5			D
CH(1)	1			A
CH(1)	2			D
CH(1)	3			A
CH(1)	4			D
CH(1)	5			D
CH(1)	6			D
CH(1)	7			B
CH(1)	8			C
CH(1)	9			A
CHA(1)	1			D
CHF(1)	1			B
CHF(1)	2			D
CHF(1)	3			B
CHF(1)	4			D
CHF(1)	5			D
CHH(1)	1			D
CHH(1)	2			D

Comment Letter	Comment	Type of Response: Individual	Topical	Standard
CHH(1)	3			D
CHH(1)	4			C
CHH(1)	5			C
CHH(1)	6			D
CHH(1)	7			B
CHH(1)	8			B
CHH(1)	9			D
CHM(1)	1			D
CHM(1)	2			D
CHM(1)	3			D
CHM(1)	4			B
CIC(1)	1			D
CIC(1)	2			A
CIE(1)	1			D
CIE(1)	2			D
CJ(1)	1			A
CJ(1)	2			B
CK(1)	1			A
CK(1)	2			A
CK(1)	3		A	
CK(1)	4			D
CK(1)	5			D
CK(1)	6			D
CK(1)	7			D
CK(1)	8			D
CL(1)	1			B

Comment Letter	Comment	Type of Response: Individual	Topical	Standard
CL(1)	2			D
CM(1)	1			D
CN(1)	1			D
CN(1)	2			D
CN(1)	3			D
CN(1)	4			C
CN(1)	5			A
CN(1)	6			A
COH(1)	1			A
COH(1)	2			A
COH(1)	3			D
COH(1)	4			D
COH(1)	5			D
COH(1)	6			B
COH(1)	7			C
COH(1)	8			A
CON(1)	1			D
CON(1)	2			D
COW(1)	1			D
COW(1)	2			D
COW(1)	3			D
CP(1)	1			A
CP(1)	2			A,D
CP(1)	3			D
CRM(1)	1			A
CRM(1)	2			D

Comment Letter	Comment	Type of Response: Individual	Topical	Standard
CRM(1)	3			A
CRM(1)	4			D
CRM(1)	5			D
CRM(1)	6			D
CRM(1)	7			B
CRM(1)	8			C
CRM(1)	9			A
CS(1)	1			D
CS(1)	2		B	
CS(1)	3			C
CS(1)	4			D
CSOL(1)	1			D
CSOL(1)	2			D
CSOL(1)	3			D
CT(1)	1			D
CW(1)	1			D
CW(1)	2			D
CW(1)	3			B
CW(1)	4			D
CW(1)	5			D
DA(1)	1		D	D
DA(1)	2			D
DA(1)	3			D
DA(1)	4			D
DA(1)	5			D
DAC(1)	1			A

Comment Letter	Comment	Type of Response: Individual	Topical	Standard
DAD(1)	1			D
DAD(1)	2	•		
DAD(1)	3		B	
DAD(1)	4	•		
DAD(1)	5			D
DAF(1)	1			D
DAF(1)	2			D
DAH(1)	1			B
DAJ(1)	1			A,D
DAJ(1)	2			A
DAJ(1)	3			D
DAJ(1)	4			D
DAJ(1)	5			D
DAJ(1)	6			B
DAJ(1)	7			C
DAJ(1)	8			A
DAL(1)	1			D
DAL(1)	2			D
DAL(1)	3			A
DAL(1)	4			D
DAL(1)	5			D
DAL(1)	6	•		
DAM(1)	1			A
DAM(1)	2			B
DAM(1)	3			D
DAM(1)	4			D

Comment Letter	Comment	Type of Response: Individual	Topical	Standard
DANL(1)	1			D
DANL(1)	2			D
DANP(1)	1			D
DANP(1)	2			D
DANS(1)	1			D
DANS(1)	2			D
DANS(1)	3			D
DANS(1)	4			D
DANS(1)	5			A
DAP(1)	1			D
DAP(1)	2			D
DAP(1)	3			D
DAP(1)	4			D
DAP(1)	5			D
DARC(1)	1			D
DARC(1)	2			D
DARC(1)	3			D
DAS(1)	1			D
DAS(1)	2			D
DAS(1)	3			D
DAVC(1)	1			D
DAVH(1)	1			D
DAVH(1)	2			D
DAVH(1)	3			D
DAVH(1)	4			D
DAVIJ(1)	1			A

Comment Letter	Comment	Type of Response: Individual	Topical	Standard
DAVIJ(1)	2			A
DAVIJ(1)	3			D
DAVIJ(1)	4			D
DAVIJ(1)	5			D
DAVIJ(1)	6			B
DAVIJ(1)	7			C
DAVIJ(1)	8			A
DAVJ(1)	1			B
DAVJ(1)	2			D
DAVJ(1)	3			B
DAVS(1)	1			D
DAW(1)	1	•	D	
DAW(1)	2	•		
DAW(1)	3	•		
DAW(1)	4			B
DAW(1)	5			B
DB(1)	1			A
DB(1)	2			D
DB(1)	3			A
DC(1)	1			D
DC(1)	2			D
DC(1)	3			D
DC(1)	4			D
DC(1)	5			D
DC(1)	6			B
DD(1)	1			D

Comment Letter	Comment	Type of Response: Individual	Topical	Standard
DD(1)	2			D
DD(1)	3			D
DEH(1)	1			D
DEH(1)	2			B
DEH(1)	3			D
DEK(1)	1			D
DES(1)	1			D
DES(1)	2			D
DF(1)	1			A
DF(1)	2			A
DF(1)	3			D
DF(1)	4			D
DF(1)	5			D
DF(1)	6			B
DF(1)	7			C
DF(1)	8			A
DG(1)	1			D
DG(1)	2			D
DG(1)	3			D
DG(1)	4			D
DG(1)	5			B
DH(1)	1			D
DH(1)	2			D
DH(1)	3			D
DH(1)	4			D
DH(1)	5			B

Comment Letter	Comment	Type of Response: Individual	Topical	Standard
DH(1)	6			A
DIH(1)	1			D
DIH(1)	2			D
DIH(1)	3			D
DIH(1)	4			A
DIJ(1)	1		B	
DIJ(1)	2	•		
DIJ(1)	3			D
DJ(1)	1			A
DJ(1)	2			B
DJ(1)	3			A
DJ(1)	4			D
DJ(1)	5			D
DJ(1)	6			D
DJ(1)	7			B
DJ(1)	8			C
DJ(1)	9			A
DK(1)	1			D
DK(1)	2			A
DL(1)	1			D
DL(1)	2			D
DL(1)	3			D
DM(1)	1			A
DM(1)	2			A
DM(1)	3			D
DM(1)	4			D

Comment Letter	Comment	Type of Response: Individual	Topical	Standard
DN(1)	1			A
DN(1)	2			D
DN(1)	3			D
DO(1)	1			D
DO(1)	2			B
DO(1)	3			D
DOF(1)	1			D
DOF(1)	2			A
DOF(1)	3			D
DOF(1)	4			D
DOF(1)	5			D
DOF(1)	6			A
DOM(1)	1			A
DOM(1)	2			A
DOM(1)	3			D
DOM(1)	4			D
DOM(1)	5			D
DOMS(1)	1			D
DOMS(1)	2			D
DOMS(1)	3			C
DOMS(1)	4			D
DOMS(1)	5			A
DOP(1)	1			D
DOP(1)	2			D
DOP(1)	3			D
DP(1)	1			A

Comment Letter	Comment	Type of Response: Individual	Topical	Standard
DP(1)	2			D
DP(1)	3			D
DP(1)	4			D
DP(1)	5			A
DR(1)	1	•		
DR(1)	2			B
DR(1)	3			D
DR(1)	4			D
DR(1)	5			D
DR(1)	6			D
DR(1)	7			D
DR(1)	8			A
DS(1)	1			A
DS(1)	2			A
DS(1)	3			D
DS(1)	4			D
DS(1)	5			D
DS(1)	6			B
DS(1)	7			C
DS(1)	8			A
DW(1)	1			D
DW(1)	2			C
DW(2)	1			D
DW(2)	2			C
DZ(1)	1			A
DZ(1)	2			D

Comment Letter	Comment	Type of Response: Individual	Topical	Standard
DZ(1)	3			D
EA(1)	1			A
EA(1)	2			A
EA(1)	3			D
EA(1)	4			D
EA(1)	5			D
EA(1)	6			B
EA(1)	7			C
EA(1)	8			A
EDF(1)	1			A
EDF(1)	2			A
EDF(1)	3			D
EDF(1)	4			D
EDF(1)	5			D
EDF(1)	6			B
EDF(1)	7			C
EDF(1)	8			A
EDL(1)	1			A
EDL(1)	2			D
EE(1)	1			B
EE(1)	2		B,C	
EE(1)	3			C
EE(1)	4			E
EE(1)	5			D
EF(1)	1			D
EF(1)	2			D
EF(1)	3			D
EF(1)	4			A
EG(1)	1			D
EG(1)	2			D
EG(1)	3			D
EH(1)	1			D
EH(1)	2			A
EH(1)	3			D
EH(1)	4			A
EH(1)	5	•		
EH(1)	6	•		
EH(1)	7			B
EHG(1)	1			A
EHG(1)	2			A
EHG(1)	3			D
EHG(1)	4			D
EHG(1)	5			D
EHG(1)	6			A
EHG(1)	7			A
EK(1)	1			D
EK(1)	2			D
EK(1)	3			D
EK(1)	4			D
EK(1)	5			D
EK(1)	6			A
EL(1)	1			D
EL(1)	2			D
EL(1)	3			D
ELF(1)	1			D
ELF(1)	2			D
ELF(1)	3			A
ELG(1)	1			D
ELG(2)	1			D
ELG(2)	2			D
ELG(2)	3			D
ELG(2)	4			A
ELH(1)	1			D
ELH(1)	2			D
ELH(1)	3			D
ELH(1)	4			D
ELH(1)	5			D
ELH(1)	6			A
EM(1)	1			D
EM(1)	2			D
EO(1)	1			D
EO(1)	2			D
EP(1)	1			A
EP(1)	2			A
EP(1)	3			D
EP(1)	4			D
EP(1)	5			D
EP(1)	6			B
EP(1)	7			C
EP(1)	8			A
EP(2)	1			A
EP(2)	2			A
EP(2)	3			B
EP(2)	4			A
EP(2)	5			A
ER(1)	1			A
ER(1)	2			D
ER(1)	3			D
ER(1)	4			D
ER(1)	5	•		
ER(1)	6			D
ER(1)	7			D
ER(1)	8			D
ER(1)	9			D
ER(1)	10			D
ER(1)	11			D
ER(1)	12			D
ER(1)	13			D
ER(1)	14			D
ER(1)	15			D
ER(1)	16			D
ER(1)	17			D
ER(1)	18	•		
ER(1)	19			D

Comment Letter	Comment	Type of Response: Individual	Topical	Standard
ER(1)	20			A
ER(1)	21			D
ER(1)	22			B
ER(1)	23			A
ERK(1)	1			D
ERK(1)	2			D
ERK(1)	3			A
ERT(1)	1			A,D
ERT(1)	2			D
ERW(1)	1			D
ERW(1)	2			D
ERW(1)	3			A
ES(1)	1			D
ET(1)	1			D
ET(1)	2			D
ET(1)	3			D
ET(1)	4			D
ET(1)	5			D
ET(1)	6			A
EUS(1)	1			D
EUS(1)	2			D
EUS(1)	3			E
EUS(1)	4			D
EUS(1)	5			D
EUS(1)	6			D
EUS(1)	7			D

Comment Letter	Comment	Type of Response: Individual	Topical	Standard
EUS(1)	8			D
EUS(1)	9			A
EVC(1)	1			A
EVC(1)	2			A
EVC(1)	3			A
EVC(1)	4			D
EW(1)	1			D
EW(1)	2			D
EW(1)	3			C
EW(1)	4			D
EW(1)	5			D
FA(1)	1			D
FA(1)	2			D
FB(1)	1			D
FB(1)	2			D
FB(1)	3			D
FB(1)	4			D
FB(1)	5			A
FC(1)	1			D
FC(1)	2			D
FD(1)	1			A
FD(1)	2			A
FD(1)	3			D
FD(1)	4			D
FD(1)	5			D
FD(1)	6			B

Comment Letter	Comment	Type of Response: Individual	Topical	Standard
FD(1)	7			C
FD(1)	8			A
FG(1)	1			D
FG(1)	2		A	
FH(1)	1			A
FH(1)	2			D
FH(1)	3			C
FH(1)	4			D
FH(1)	5			A
FV(1)	1			A
FV(1)	2			D
FV(1)	3			D
FV(1)	4			D
FV(1)	5			D
FV(1)	6			E
FV(1)	7		B	
FV(1)	8	•		
FV(1)	9	•		
FV(1)	10		B	
GA(1)	1			D
GA(1)	2			B
GA(1)	3			D
GA(1)	4			D
GA(1)	5			A
GAO(1)	1			D
GB(1)	1			D

Comment Letter	Comment	Type of Response: Individual	Topical	Standard
GB(1)	2			D
GB(1)	3			D
GB(1)	4			A
GB(1)	5			D
GB(1)	6			D
GE(1)	1			D
GE(1)	2			D
GEA(1)	1			E
GEA(1)	2			D
GEA(1)	3			C
GEA(1)	4			A
GEA(1)	5			C
GEA(1)	6		D	
GEG(1)	1			A
GEG(1)	2			D
GEG(1)	3			A
GEG(1)	4			D
GEG(1)	5			D
GEG(1)	6			D
GEG(1)	7			B
GEG(1)	8			C
GEG(1)	9			A
GEOP(1)	1			A
GEOP(1)	2			D
GEOP(1)	3			A
GEOP(1)	4			D

Comment Letter	Comment	Type of Response: Individual	Topical	Standard
GEOP(1)	5			D
GEOP(1)	6			D
GEOP(1)	7			B
GEOP(1)	8			C
GEOP(1)	9			A
GEP(1)	1			D
GEP(1)	2			D
GEP(1)	3			D
GEP(1)	4			D
GEP(1)	5			D
GEP(1)	6			D
GEP(1)	7			D
GEP(1)	8			D
GERG(1)	1			A
GERG(1)	2			A
GG(1)	1			D
GG(1)	2			C
GG(1)	3			D
GIR(1)	1			A
GIR(1)	2		B	
GIR(1)	3			C
GIR(1)	4			E
GIR(1)	5	•		
GIR(1)	6			A
GIR(1)	7			D
GIT(1)	1			A

Comment Letter	Comment	Type of Response: Individual	Topical	Standard
GIT(1)	2			A
GIT(2)	1			A
GIT(2)	2			D
GIT(2)	3			A
GIT(2)	4			D
GIT(2)	5			D
GIT(2)	6			D
GIT(2)	7			B
GIT(2)	8			C
GIT(2)	9			A
GK(1)	1			A
GK(1)	2			D
GK(1)	3	•		
GK(1)	4			A
GL(1)	1			A
GL(1)	2			D
GL(1)	3			A
GL(1)	4			D
GL(1)	5			D
GL(1)	6			D
GL(1)	7			C
GL(1)	8			D
GL(1)	9			A
GLB(1)	1			D
GLB(1)	2			D
GM(1)	1			D

Comment Letter	Comment	Type of Response: Individual	Topical	Standard
GM(1)	2			D
GM(1)	3			C
GM(1)	4			D
GM(1)	5			D
GM(1)	6			A
GO(1)	1			D
GO(1)	2			D
GO(1)	3			A
GP(1)	1			A
GP(1)	2			D
GP(1)	3			A
GP(1)	4			D
GP(1)	5			D
GP(1)	6			D
GP(1)	7			B
GP(1)	8			C
GP(1)	9			A
GR(1)	1			D
GR(1)	2			D
GR(1)	3			D
GR(1)	4			B
GR(1)	5			D
GR(1)	6			D
GR(1)	7			D
GR(1)	8			D
GR(1)	9			D

Comment Letter	Comment	Type of Response: Individual	Topical	Standard
GR(1)	10			D
GR(1)	11			D
GRA(1)	1			D
GRA(1)	2			D
GRA(1)	3			D
GRA(1)	4			D
GRA(1)	5			D
GREA(1)	1			A
GREA(1)	2			D
GREA(1)	3			D
GREA(1)	4			A,D
GREA(1)	5			A
GREG(1)	1			A
GT(1)	1			D
GT(1)	2			C
GT(1)	3			D
GT(1)	4			A
GUG(1)	1			D
GUG(1)	2			D
GW(1)	1			D
GW(1)	2			D
GW(1)	3			D
GW(1)	4			B
GW(1)	5			D
GW(1)	6			D
GW(1)	7			A

Comment Letter	Comment	Type of Response: Individual	Topical	Standard
GZ(1)	1			D
GZ(1)	2			D
GZ(1)	3			B
GZ(1)	4			D
HAL(1)	1			A
HAL(1)	2			B
HAL(1)	3			A
HB(1)	1			D
HD(1)	1			D
HD(1)	2			D
HD(1)	3			D
HD(1)	4			D
HD(1)	5			A
HE(1)	1			A
HE(1)	2			A
HE(1)	3			D
HE(1)	4			D
HE(1)	5			D
HE(1)	6			B
HE(1)	7			C
HE(1)	8			A
HEB(1)	1			B
HEB(1)	2			C
HEB(1)	3			C
HEB(1)	4	•		
HEB(1)	5			C

Comment Letter	Comment	Type of Response: Individual	Topical	Standard
HEB(1)	6	•	D	
HED(1)	1			D
HED(1)	2			D
HED(1)	3			D
HED(1)	4			D
HEF(1)	1			B
HEF(1)	2			D
HEF(1)	3			A
HEIF(1)	1			B
HEIF(1)	2			D
HEIF(1)	3			A
HEW(1)	1			D
HEW(1)	2			D
HEW(1)	3			D
HEW(1)	4			D
HEW(1)	5			D
HEW(1)	6			D
HF(1)	1			D
HF(1)	2			D
HJ(1)	1			A
HJ(1)	2			D
HJ(1)	3			D
HJ(1)	4			D
HJ(1)	5			B
HJ(1)	6			C
HJ(1)	7			A

Comment Letter	Comment	Type of Response: Individual	Topical	Standard
HL(1)	1			B
HL(1)	2	•		
HL(1)	3		B	
HL(1)	4	•		
HL(1)	5			C
HL(1)	6			D
HM(1)	1			A
HM(1)	2			D
HM(1)	3	•		
HM(1)	4			A
HS(1)	1			B
HS(2)	1			D
HS(2)	2			D
HS(2)	3			D
HW(1)	1			A
HW(1)	2			D
HW(1)	3			D
HW(1)	4			D
HW(1)	5			A
IB(1)	1			D
IB(1)	2	•		
IB(1)	3			A
IB(1)	4	•		
IC(1)	1			E
IC(1)	2			A
IC(1)	3			D

Comment Letter	Comment	Type of Response: Individual	Topical	Standard
IC(1)	4			E
IC(1)	5			D
IC(1)	6			B
IC(2)	1			A
IC(2)	2			A
IC(2)	3			A
IC(2)	4			D
IC(2)	5			D
IC(2)	6			C
IC(2)	7	•		
ID(1)	1			A
IF(1)	1			D
IF(1)	2			D
IG(1)	1			B
IG(1)	2	•		
IG(1)	3			D
IH(1)	1			D
IH(1)	2			D
IN(1)	1			D
IN(1)	2			B
IN(1)	3			D
IN(2)	1			B
IN(2)	2			D
IN(2)	3			D
INP(1)	1			D
INP(1)	2			B

Comment Letter	Comment	Type of Response: Individual	Topical	Standard
INP(1)	3	•		
INP(1)	4	•		
INP(1)	5			D
INP(1)	6			D
INP(1)	7			D
INP(1)	8		C	
INP(1)	9			D
INP(1)	10			A
IP(1)	1			B
IP(1)	2	•		
IP(1)	3			E
IP(1)	4	•		
IP(1)	5	•		
IP(1)	6	•		
IP(1)	7	•		
IP(1)	8	•		
IP(1)	9	•		
IP(1)	10	•		
IP(1)	11			C
IP(1)	12			A
IRG(1)	1			D
IRG(1)	2			D
IRG(1)	3			D
IRG(1)	4			A
IRP(1)	1			A
IRP(1)	2			D

Comment Letter	Comment	Type of Response: Individual	Topical	Standard
JAA(1)	1			A
JAA(1)	2			B
JAC(1)	1			D
JAC(1)	2			D
JAC(1)	3			D
JAC(1)	4			A
JAD(1)	1			D
JAK(1)	1			A,D
JAK(1)	2			D
JAK(1)	3			C
JAK(1)	4			A
JAK(1)	5			D
JAK(1)	6			C
JAK(1)	7			A
JAK(1)	8			C
JAK(1)	9			D
JAK(1)	10			D
JAK(1)	11			C
JAK(1)	12	•		
JAK(1)	13			A,D
JAK(1)	14			D
JAK(1)	15	•		
JAK(1)	16			C
JAK(1)	17			C
JAK(1)	18			C
JAK(1)	19			B

Comment Letter	Comment	Type of Response: Individual	Topical	Standard
JAK(1)	20			A
JAK(1)	21	•		
JAK(1)	22			C
JAK(1)	23			D
JAK(1)	24	•		
JAK(1)	25			B
JAK(1)	26			B
JAK(1)	27			B
JAK(1)	28			D
JAK(1)	29			D
JAM(1)	1			C
JAM(1)	2			D
JAM(1)	3			D
JAM(1)	4			D
JAM(1)	5			D
JAM(1)	6			D
JAM(1)	7			D
JAM(1)	8			D
JAM(1)	9			A
JAS(1)	1			D
JAS(1)	2			D
JAS(1)	3			A
JAU(1)	1			D
JAU(1)	2			D
JAU(2)	1			D
JAU(2)	2			D

Comment Letter	Comment	Type of Response: Individual	Topical	Standard
JAU(2)	3			A
JB(1)	1			D
JB(1)	2			D
JB(1)	3			D
JB(1)	4			D
JB(1)	4			D
JB(1)	5			A
JC(1)	1			A
JC(1)	2			D
JC(1)	3			A
JC(1)	4			D
JC(1)	5			D
JC(1)	6			D
JC(1)	7			B
JC(1)	8			C
JC(1)	9			A
JD(1)	1			A,D
JD(1)	2			D
JD(1)	3	•		
JD(1)	4			D
JEAB(1)	1			A
JEAS(1)	1			A
JEAS(1)	2			A
JEAS(1)	3			D
JEAS(1)	4			D
JEAS(1)	5			D

Comment Letter	Comment	Type of Response: Individual	Topical	Standard
JEAS(1)	6			B
JEAS(1)	7			C
JEAS(1)	8			A
JEB(1)	1			B
JEB(1)	2	•		
JEB(1)	3			D
JEC(1)	1			A
JEC(1)	2			D
JEC(1)	3			A
JEC(1)	4			D
JEC(1)	5			D
JEC(1)	6			D
JEC(1)	7			B
JEC(1)	8			C
JEC(1)	9			A
JEM(1)	1			B
JEM(1)	2			A
JEP(1)	1			B
JEP(1)	2			C
JER(1)	1			A
JER(1)	2			D
JER(1)	3			A
JER(1)	4			D
JER(1)	5			D
JER(1)	6			D
JER(1)	7			B

Comment Letter	Comment	Type of Response: Individual	Topical	Standard
JER(1)	8			C
JER(1)	9			A
JES(1)	1			B
JES(1)	2			D
JES(1)	3			A
JEW(1)	1			D
JEW(1)	2			D
JEW(1)	3			D
JEW(1)	4			D
JEW(1)	5			D
JEW(1)	6		D	
JF(1)	1			A
JF(1)	2			C
JF(1)	3			B
JF(1)	4			A
JF(1)	5			B
JF(1)	6			D
JF(1)	7			D
JF(1)	8			D
JF(1)	9			D
JF(1)	10			D
JF(1)	11			D
JF(1)	12			D
JF(1)	13			A
JG(1)	1			D
JG(1)	2			D

Comment Letter	Comment	Type of Response: Individual	Topical	Standard
JG(1)	3			D
JG(1)	4			D
JG(1)	5			D
JG(1)	6			D
JG(1)	7			D
JG(1)	8			D
JG(1)	9			D
JG(1)	10			D
JG(1)	11			A
JH(1)	1			A
JH(1)	2			B
JH(1)	3	•		
JH(1)	4			A
JIA(1)	1			A
JIA(1)	2			D
JIA(1)	3			D
JIB(1)	1			D
JIB(1)	2			D
JIB(1)	3			D
JIL(1)	1			A
JIL(1)	2			D
JIL(1)	3			D
JIL(1)	4			D
JIL(1)	5			A
JIS(1)	1			D
JIS(1)	2			D

Comment Letter	Comment	Type of Response: Individual	Topical	Standard
JIS(1)	3			D
JIW(1)	1			D
JIW(1)	2			D
JIW(1)	3			D
JIW(1)	4			C
JIW(1)	5			D
JIW(1)	6			D
JK(1)	1			A
JK(1)	2			D
JK(1)	3			D
JK(1)	4			D
JK(1)	5			D
JK(1)	6			A,D
JK(1)	7			D
JK(1)	8			D
JK(1)	9			B
JK(1)	10			D
JK(1)	11			D
JK(1)	12			D
JK(1)	13			D
JK(1)	14			B
JK(1)	15			D
JK(1)	16			A
JL(1)	1			D
JL(1)	2			D
JL(1)	3			D

Comment Letter	Comment	Type of Response: Individual	Topical	Standard
JL(1)	4			A
JL(1)	5			B
JL(1)	6			D
JM(1)	1			A
JM(1)	2			A
JM(1)	3			D
JM(1)	4			D
JM(1)	5			D
JM(1)	6			B
JM(1)	7			C
JM(1)	8			A
JO(1)	1			E
JOAR(1)	1			D
JOAR(1)	2			D
JOAR(1)	3			A
JOAR(1)	4			D
JOAR(1)	5			A
JOAR(1)	6			D
JOB(1)	1			D
JOB(1)	2			B
JOB(1)	3			D
JOC(1)	1			A
JOC(1)	2			B
JOC(1)	3			D
JOC(1)	4			D
JOEH(1)	1			A
JOEH(1)	2			A
JOEH(1)	3			A
JOEH(1)	4			D
JOEH(1)	5			D
JOEH(1)	6			D
JOEH(1)	7			D
JOEH(1)	8			A
JOEH(2)	1			A
JOEH(2)	2			D
JOEH(2)	3			A
JOEH(2)	4			D
JOEH(2)	5			D
JOEH(2)	6			D
JOEH(2)	7			B
JOEH(2)	8			C
JOEH(2)	9			A
JOH(1)	1			B
JOH(1)	2			D
JOH(1)	3		B	
JOH(1)	4	•		
JOH(1)	5	•		
JOH(1)	6	•		
JOH(1)	7			C
JOH(1)	8		D	
JOH(1)	9	•		
JOH(1)	10			B
JOH(1)	11			B
JOH(1)	12			A
JOHH(1)	1			D
JOHH(1)	2			D
JOHH(1)	3			D
JOHH(1)	4			D
JOL(1)	1			B
JOL(1)	2			D
JOL(1)	3			B
JOL(1)	4		B	
JOL(1)	5	•		
JOL(1)	6	•		
JOL(1)	7	•		
JOL(1)	8	•		
JOL(1)	9	•		
JOL(1)	10	•		
JOL(1)	11	•		
JOL(1)	12			B
JOL(1)	13			C
JOL(1)	14			B
JOL(1)	15			C
JOL(1)	16		B	
JOL(1)	17	•		
JOL(1)	18	•		
JOL(1)	19			D
JOL(1)	20			B
JOL(1)	21			D
JOL(1)	22			D
JOL(1)	23			D
JOL(1)	24			D
JOL(1)	25			D
JOL(1)	26			D
JOL(1)	27			D
JOL(1)	28			D
JOL(1)	29			D
JOL(1)	30			A
JOM(1)	1			C
JOM(1)	2			B
JOM(1)	3			B
JOM(1)	4			B
JOM(1)	5			D
JONR(1)	1			D
JONR(1)	2			D
JONR(1)	3			D
JONR(1)	4			D
JONR(1)	5			A
JONR(1)	6			B
JONR(1)	7			D
JONR(1)	8			A,D
JONR(1)	9			D
JONR(1)	10			A
JOP(1)	1			B

Comment Letter	Comment	Type of Response: Individual	Topical	Standard
JOP(1)	2			C
JOP(1)	3	•		
JOP(1)	4		C	
JOP(1)	5			A
JOP(1)	6			D
JOR(1)	1			C
JOR(1)	2			B
JOR(1)	3			B
JOS(1)	1			D
JOS(1)	2			D
JOS(1)	3			D
JOS(1)	4			D
JOS(1)	5			D
JOS(1)	6			D
JOS(1)	7			B
JOSC(1)	1			B
JOSC(1)	2	•		
JOSC(1)	3			B
JOSC(1)	4	•		
JOSC(1)	5	•		
JOSC(1)	6			D
JOSC(1)	7			D
JOSC(1)	8			D
JOSC(1)	9			D
JOSC(1)	10			D
JOSC(1)	11	•		

Comment Letter	Comment	Type of Response: Individual	Topical	Standard
JOSE(1)	1			D
JOSE(1)	2			D
JOSE(1)	3			B
JOSE(1)	4			D
JOSS(1)	1			D
JOSS(1)	2			D
JOSS(1)	3			D
JOW(1)	1			A
JOW(1)	2			C
JOW(1)	3			B
JOW(1)	4			C
JOW(1)	5			D
JOYP(1)	1			D
JOYP(1)	2			D
JOYP(1)	3			D
JOYR(1)	1			A
JOYR(1)	2			D
JOYR(1)	3			B
JOYR(1)	4			D
JOYR(1)	5			D
JOYR(1)	6			D
JOYR(1)	7			B
JOYR(1)	8			D
JOYR(1)	9			A
JP(1)	1	•		
JP(1)	2			D

Comment Letter	Comment	Type of Response: Individual	Topical	Standard
JP(1)	3			B
JR(1)	1			A
JR(1)	2			A
JR(1)	3			D
JR(1)	4			D
JR(1)	5			D
JR(1)	6			B
JR(1)	7			C
JR(1)	8			A
JS(1)	1			A
JS(1)	2			D
JS(1)	3			A
JS(1)	4			D
JS(1)	5			C
JS(1)	6			B
JS(1)	7			D
JU(1)	1	•		
JU(1)	2	•		
JU(1)	3			D
JU(1)	4			C
JU(1)	5			D
JU(1)	6			A
JU(1)	7			D
JU(1)	8			A
JUB(1)	1			A
JUB(1)	2			D

Comment Letter	Comment	Type of Response: Individual	Topical	Standard
JUB(1)	3			D
JUB(1)	4			D
JUB(1)	5			D
JUB(1)	6			D
JUB(1)	7			D
JUB(1)	8			D
JUM(1)	1			D
JUM(1)	2			D
JUM(1)	3			D
JUM(1)	4			B
JUP(1)	1			A
JUP(1)	2			A
JUP(1)	3			D
JV(1)	1			A
JV(1)	2			A
JV(1)	3			D
JV(1)	4			D
JV(1)	5			D
JV(1)	6			B
JV(1)	7			C
JV(1)	8			A
JW(1)	1			D
JW(1)	2			D
JY(1)	1			D
KAB(1)	1			D
KAB(1)	2			D

Comment Letter	Comment	Type of Response: Individual	Topical	Standard
KAB(1)	3			D
KAC(1)	1			A
KAC(1)	2			D
KAC(1)	3			A
KAC(1)	4			D
KAC(1)	5			D
KAC(1)	6			D
KAC(1)	7			B
KAC(1)	8			C
KAC(1)	9			A
KAW(1)	1			A
KAW(1)	2			A
KAW(1)	3			D
KAW(1)	4			D
KAW(1)	5			D
KAW(1)	6			A
KB(1)	1			D
KB(1)	2			D
KB(1)	3			B
KC(1)	1			D
KC(1)	2			D
KC(1)	3			A,D
KC(1)	4			D
KC(1)	5			D
KC(1)	6			D
KC(1)	7			C

Comment Letter	Comment	Type of Response: Individual	Topical	Standard
KC(1)	8			D
KC(1)	9			A
KEC(1)	1			A
KEC(1)	2			D
KEC(1)	3			A
KEC(1)	4			D
KEC(1)	5			D
KEC(1)	6			D
KEC(1)	7			D
KEC(1)	8			D
KEC(1)	9			A
KEF(1)	1			A
KEF(1)	2			D
KEF(1)	3			D
KEF(1)	4			D
KEF(1)	5			D
KEF(1)	6			D
KEF(1)	7			A
KEIC(1)	1			D
KEIC(1)	2			D
KEIC(1)	3			A
KES(1)	1			D
KES(1)	2			A
KF(1)	1			A
KF(1)	2			D
KF(1)	3			D

Comment Letter	Comment	Type of Response: Individual	Topical	Standard
KF(1)	4			D
KF(1)	5			D
KF(1)	6			D
KF(1)	7			A
KG(1)	1			D
KG(1)	2			D
KG(1)	3			B
KH(1)	1			D
KH(1)	2			D
KH(1)	3			A
KH(1)	4			D
KH(1)	5			D
KH(1)	6			A
KS(1)	1			D
KS(1)	2			D
KS(1)	3			D
KS(1)	4			D
KS(1)	5			D
KS(1)	6			D
KS(1)	7			C
KS(1)	8			B
KS(1)	9			A
KT(1)	1			D
KT(1)	2			D
KT(1)	3			A
KW(1)	1			D

Comment Letter	Comment	Type of Response: Individual	Topical	Standard
KW(1)	2			D
KW(1)	3			D
KW(1)	4			D
KW(1)	5			D
KW(1)	6			A
KW(1)	7			A
KY(1)	1			D
KY(1)	2			D
LA(1)	1			D
LA(1)	2			A
LAM(1)	1			D
LAM(1)	2			D
LAM(1)	3			D
LAM(1)	4			C
LAR(1)	1			B
LARS(1)	1			D
LARS(1)	2			D
LARS(1)	3			D
LAS(1)	1			A
LAS(1)	2			A
LAS(1)	3			D
LAS(1)	4			D
LAS(1)	5			D
LAS(1)	6			B
LAS(1)	7			C
LAS(1)	8			A

Comment Letter	Comment	Type of Response: Individual	Topical	Standard
LAT(1)	1			D
LB(1)	1			A
LB(1)	2			A
LB(1)	3			D
LB(1)	4			D
LB(1)	5			D
LB(1)	6			B
LB(1)	7			C
LB(1)	8			A
LC(1)	1			B
LC(1)	2			D
LC(1)	3			A
LESW(1)	1			D
LESW(1)	2			A
LEW(1)	1			D
LEW(1)	2			D
LIJ(1)	1			A
LIJ(1)	2			A
LIJ(1)	3			D
LIJ(1)	4			D
LIJ(1)	5			D
LIJ(1)	6			D
LIJ(1)	7			A
LIL(1)	1			B
LIL(1)	2			D
LIL(1)	3			D

Comment Letter	Comment	Type of Response: Individual	Topical	Standard
LIM(1)	1			D
LIM(1)	2			D
LIT(1)	1			D
LIT(1)	2			D
LIT(1)	3			C
LIT(2)	1			D
LIT(2)	2			D
LIT(2)	3			C
LJ(1)	1			D
LJ(1)	2			D
LJ(1)	3			D
LJ(1)	4			D
LJ(1)	5			D
LJ(1)	6			D
LJ(2)	1			A
LJ(2)	2			D
LJ(2)	3			D
LJ(2)	4			D
LJ(2)	5			D
LL(1)	1			A
LL(1)	2			D
LL(1)	3			A
LL(1)	4			D
LL(1)	5			D
LL(1)	6			D
LL(1)	7			B

Comment Letter	Comment	Type of Response: Individual	Topical	Standard
LL(1)	8			C
LL(1)	9			A
LM(1)	1			A
LM(1)	2			D
LM(1)	3			D
LM(1)	4			B
LM(1)	5			B
LM(1)	6			A
LOM(1)	1			B
LOM(1)	2			C
LOM(1)	3	•		
LOM(1)	4			A
LOM(1)	5	•		
LOM(1)	6			E
LOM(1)	7			C
LOM(1)	8			A
LOR(1)	1			D
LOR(1)	2			D
LOR(1)	3			D
LOR(1)	4			B
LOR(1)	5			D
LP(1)	1			B
LP(1)	2	•		
LP(1)	3			B
LP(1)	4	•		
LP(1)	5			C

Comment Letter	Comment	Type of Response: Individual	Topical	Standard
LP(1)	6	•		
LR(1)	1			D
LR(1)	2			D
LR(1)	3			D
LR(1)	4			D
LR(1)	5			B
LR(1)	6			D
LS(1)	1			A
LS(1)	2			A
LS(1)	3			D
LS(1)	4			D
LS(1)	5			D
LS(1)	6			B
LS(1)	7			C
LS(1)	8			A
LT(1)	1			D
LT(1)	2			D
LT(1)	3			D
LT(1)	4			D
LT(1)	5			D
LT(1)	6			B
LT(1)	7			A
LUL(1)	1			D
LUL(1)	2			D
LW(1)	1			D
LW(1)	2			C

Comment Letter	Comment	Type of Response: Individual	Topical	Standard
LW(1)	3			C
LW(1)	4			D
LW(1)	5			D
MA(1)	1			D
MA(1)	2			D
MAA(1)	1			D
MAA(1)	2			D
MAA(1)	3			D
MAA(1)	4			D
MAA(1)	5			D
MAA(1)	6			D
MAA(1)	7			D
MAA(1)	8			A,D
MAA(1)	9			D
MAB(1)	1	•		
MAB(1)	2			A
MAB(2)	1	•		
MAB(2)	2			D
MAB(2)	3			A
MAB(2)	4			D
MAB(2)	5			D
MAB(2)	6			D
MAB(2)	7			B
MAB(2)	8			C
MAB(2)	9			A
MAB(3)	1			A,D
MAB(3)	2			A
MAC(1)	1			D
MAC(1)	2			D
MAC(1)	3			A,D
MAC(1)	4			D
MAD(1)	1			D
MAF(1)	1			D
MAF(1)	2			D
MAF(1)	3			D
MAF(1)	4			D
MAG(1)	1			B
MAG(1)	2			E
MAG(1)	3			A
MAG(1)	4			B
MAG(1)	5			B
MAH(1)	1			D
MAH(1)	2			D
MAH(1)	3			D
MAH(1)	4			D
MAH(1)	5			B
MAH(1)	6			A
MAL(1)	1			A
MAL(1)	2			D
MAL(1)	3			D
MAL(1)	4			D
MAL(1)	5			D
MAM(1)	1			D
MAR(1)	1			E
MAR(1)	2			E
MAR(1)	3			A
MARA(1)	1			D
MARB(1)	1			D
MARB(1)	2			D
MARB(1)	3			D
MARB(1)	4			D
MARB(1)	5			D
MARB(1)	6	•		
MARB(1)	7	•		
MARB(1)	8			E
MARB(1)	9			D
MARB(1)	10	•		
MARB(1)	11			D
MARB(1)	12			A
MARB(1)	13		D	
MARB(2)	1			D
MARB(2)	2			D
MARB(2)	3			D
MARD(1)	1			D
MARD(1)	2			D
MARD(1)	3			D
MARD(1)	4			C
MARF(1)	1			D
MARF(1)	2			A
MARF(1)	3			A
MARIA(1)	1			D
MARIA(1)	2			D
MARIB(1)	1			A
MARIB(1)	2			D
MARIB(1)	3			A
MARIB(1)	4			D
MARIB(1)	5			D
MARIB(1)	6			D
MARIB(1)	7			B
MARIB(1)	8			C
MARIB(1)	9			A
MARIW(1)	1			B
MARIW(1)	2			D
MARIW(1)	3			D
MARIW(1)	4			D
MARR(1)	1			D
MARR(1)	2			D
MARR(1)	3			B
MARR(2)	1			A
MARR(2)	2			A
MARR(2)	3			A
MARR(2)	4			D
MARR(2)	5			D
MARR(2)	6			D

Comment Letter	Comment	Type of Response: Individual	Topical	Standard
MARVB(1)	1			A
MARVB(1)	2			D
MARVB(1)	3			A
MARVB(1)	4			D
MARVB(1)	5			D
MARVB(1)	6			D
MARVB(1)	7			B
MARVB(1)	8			C
MARVB(1)	9			A
MARW(1)	1			B
MAT(1)	1			A
MAT(1)	2			D
MAT(1)	3			D
MAT(1)	4			D
MAT(1)	5			D
MAT(1)	6			D
MAT(1)	7			D
MAW(1)	1			D
MAW(1)	2			D
MB(1)	1			A
MB(1)	2			D
MB(1)	3			A
MB(1)	4			D
MB(1)	5			D
MB(1)	6			D
MB(1)	7			B
MB(1)	8			C
MB(1)	9			A
MC(1)	1			D
MC(1)	2			D
MC(1)	3			D
MC(1)	4			A
MD(1)	1			D
MD(1)	2			D
MD(1)	3			D
MD(1)	4			A
ME(1)	1			A
MEC(1)	1			D
MEC(1)	2			D
MEW(1)	1			D
MEW(1)	2			D
MEW(1)	3			C
MEW(1)	4			D
MEW(1)	5			D
MF(1)	1			D
MG(1)	1			A
MG(1)	2			D
MG(1)	3			A
MG(1)	4			D
MG(1)	5			D
MG(1)	6			D
MG(1)	7			B
MG(1)	8			C
MG(1)	9			A
MH(1)	1			A
MH(1)	2			D
MH(1)	3			A
MH(1)	4			D
MH(1)	5			D
MH(1)	6			A
MH(1)	7			D
MH(1)	8			B
MH(1)	9			D
MH(1)	10			D
MH(1)	11			A
MHK(1)	1			A
MHK(1)	2			A
MHK(1)	3			D
MIA(1)	1			A
MIA(1)	2			D
MIA(1)	3			D
MIB(1)	1			D
MIC(1)	1			A
MICH(1)	1			A
MICH(1)	2			B
MICH(1)	3			D
MICH(1)	4			D
MICH(1)	5			D
MICH(1)	6			D
MICH(1)	7			D
MICH(1)	8			B
MICH(1)	9			D
MICHH(1)	1			A
MICHH(1)	2			D
MICHH(1)	3			D
MICHH(1)	4			D
MICHH(1)	5			D
MICHH(1)	6			D
MICHH(1)	7			D
MICHH(1)	8			D
MID(1)	1			A
MID(1)	2			D
MID(1)	3			A
MID(1)	4			D
MID(1)	5			D
MID(1)	6			D
MID(1)	7			B
MID(1)	8			C
MID(1)	9			A
MIE(1)	1			D
MIE(1)	2			D
MIG(1)	1			D
MIH(1)	1			D
MIH(1)	2			B

Comment Letter	Comment	Type of Response: Individual	Topical	Standard
MIH(1)	3			D
MIH(1)	4			C
MIH(1)	5			D
MIH(1)	6			D
MIH(1)	7			D
MIH(1)	8			D
MIH(1)	9			D
MIH(1)	10			D
MIKH(1)	1			B
MIKH(1)	2	•		B
MIKH(1)	3			C
MIKH(1)	4			D
MIM(1)	1			C
MIM(1)	2			D
MIM(1)	3		D	
MIM(1)	4			D
MIM(2)	1			D
MIM(2)	2			D
MIM(2)	3			D
MIM(2)	4			A
MIM(2)	5	•		B
MIM(2)	6			B
MIM(2)	7			D
MIO(1)	1			D
MIO(1)	2			A
MIO(1)	3			A

Comment Letter	Comment	Type of Response: Individual	Topical	Standard
MIO(1)	4			D
MIO(1)	5			D
MIO(1)	6			C
MIO(1)	7			D
MIO(1)	8			D
MIW(1)	1			D
MIW(1)	2			D
MIW(1)	3			A
MJ(1)	1			A
MJ(1)	2			A
MJ(1)	3		D	
MK(1)	1			A
MK(1)	2			B
MK(1)	3			D
MK(1)	4			D
MK(1)	5			D
MK(1)	6			D
MK(1)	7			D
MK(1)	8			D
MK(1)	9	•		
MK(1)	10			D
MK(1)	11			A
ML(1)	1			D
ML(1)	2			A
ML(1)	3			A
ML(1)	4			B

Comment Letter	Comment	Type of Response: Individual	Topical	Standard
ML(1)	5			D
MM(1)	1	•		
MM(1)	2			B
MM(1)	3			B
MM(1)	4			D
MN(1)	1			A
MN(1)	2			D
MN(1)	3			A
MN(1)	4			D
MN(1)	5			D
MN(1)	6			D
MN(1)	7			B
MN(1)	8			C
MN(1)	9			A
MN(2)	1			A
MN(2)	2			D
MN(2)	3			C
MN(2)	4			A
MN(2)	5			A
MO(1)	1			D
MO(1)	2			D
MO(1)	3			D
MO(1)	4			D
MOP(1)	1			A
MOP(1)	2			D
MOWL(1)	1			A

Comment Letter	Comment	Type of Response: Individual	Topical	Standard
MOWL(1)	2			D
MOWL(1)	3			A
MR(1)	1			A
MR(1)	2			A
MR(1)	3			D
MR(1)	4			D
MR(1)	5			D
MR(1)	6			B
MR(1)	7			C
MR(1)	8			A
MRO(1)	1			A
MRO(1)	2			D
MS(1)	1			A
MS(1)	2			D
MS(1)	3			A
MS(1)	4			D
MS(1)	5			D
MS(1)	6			D
MS(1)	7			B
MS(1)	8			C
MS(1)	9			A
MT(1)	1			A
MT(1)	2			D
MT(1)	3			A
MT(1)	4			D
MT(1)	5			D

Comment Letter	Comment	Type of Response: Individual	Topical	Standard
MT(1)	6			D
MT(1)	7			B
MT(1)	8			C
MT(1)	9			A
MV(1)	1			D
MW(1)	1			A
MW(1)	2			A
MW(1)	3			A
MW(1)	4			D
MW(1)	5			D
MW(1)	6			D
MW(1)	7			B
MW(1)	8			C
MW(1)	9			A
NANC(1)	1			D
NANC(1)	2			D
NANC(1)	3			C
NANC(1)	4			D
NANC(1)	5			D
NANC(1)	6			D
NANC(1)	7			D
NANC(1)	8			B
NANC(1)	9			B
NANC(1)	10			B
NANC(1)	11			D
NB(1)	1			A,D

Comment Letter	Comment	Type of Response: Individual	Topical	Standard
NB(1)	2			D
NB(1)	3			D
NB(1)	4			D
NB(1)	5			A
NB(1)	6			D
NB(1)	7			D
NB(1)	8			A
NC(1)	1			D
NC(1)	2			D
NC(1)	3			D
NC(1)	4			D
NC(1)	5			D
NC(1)	6			D
NC(1)	7			D
NE(1)	1			B
NE(1)	2	•		
NE(1)	3			D
NIJ(1)	1			A
NIJ(1)	2			D
NIJ(1)	3			D
NIJ(1)	4			D
NIJ(1)	5			B
NIJ(1)	6			D
NJ(1)	1			A
NJ(1)	2			B
NJ(1)	3			B

Comment Letter	Comment	Type of Response: Individual	Topical	Standard
NJ(1)	4			D
NJ(1)	5		D	
NJ(1)	6			A
NL(1)	1			D
NL(1)	2			D
NR(1)	1			A
NR(1)	2			A
NR(1)	3			D
NR(1)	4			D
NR(1)	5			D
NR(1)	6			B
NR(1)	7			C
NR(1)	8			A
NS(1)	1			D
NS(1)	2			D
NS(1)	3			A
NW(1)	1			B
NW(1)	2	•		
NW(1)	3			B
NW(1)	4	•		
NW(1)	5			C
NW(1)	6			D
OB(1)	1			A
OB(1)	2			E
OB(1)	3			B
OB(1)	4			B

Comment Letter	Comment	Type of Response: Individual	Topical	Standard
OB(1)	5	•		
OG(1)	1			D
OG(1)	2			D
OG(1)	3			D
OG(1)	4			A
PA(1)	1			D
PA(1)	2			D
PA(1)	3			B
PA(1)	4			C
PA(1)	5			D
PA(1)	6			D
PA(1)	7			D
PA(1)	8			B
PAB(1)	1			D
PAB(1)	2			D
PAM(1)	1			D
PAM(1)	2			D
PAM(1)	3			D
PAM(1)	4			D
PAMW(1)	1			A
PAMW(1)	2			A
PAMW(1)	3			D
PAMW(1)	4			D
PAMW(1)	5			D
PAMW(1)	6			B
PAMW(1)	7			C

Comment Letter	Comment	Type of Response: Individual	Topical	Standard
PAMW(1)	8			A
PATW(1)	1			A
PATW(1)	2			D
PB(1)	1			A
PB(1)	2			A
PB(1)	3			A
PB(1)	4			D
PB(1)	5			D
PB(1)	6			D
PB(1)	7			D
PB(1)	8			A
PC(1)	1			D
PC(1)	2			C
PD(1)	1			D
PD(1)	2			C
PD(1)	3			D
PE(1)	1			A
PE(1)	2			B
PE(1)	3			D
PE(1)	4			D
PE(1)	5			D
PEH(1)	1			D
PF(1)	1			A
PF(1)	2			D
PF(1)	3			D
PF(1)	4			D

Comment Letter	Comment	Type of Response: Individual	Topical	Standard
PG(1)	1			B
PG(1)	2	•		
PG(1)	3	•		
PG(1)	4	•		
PG(1)	5	•		
PG(1)	6			C
PG(1)	7			D
PH(1)	1			D
PH(1)	2	•		
PH(1)	3			D
PH(1)	4			B
PH(1)	5			A
PHD(1)	1			D
PHD(1)	2			D
PHD(1)	3			D
PHD(1)	4			D
PHD(1)	5			D
PJ(1)	1			D
PJ(1)	2			D
PJ(1)	3			D
PL(1)	1			A
PL(1)	2			D
PM(1)	1			D
PM(1)	2			B
PM(1)	3			D
PM(1)	4			D

Comment Letter	Comment	Type of Response: Individual	Topical	Standard
PM(1)	5			D
PP(1)	1			D
PP(1)	2			D
PP(1)	3			D
PP(1)	4			A
PS(1)	1			A
PS(1)	2			A
PS(1)	3			D
PS(1)	4			D
PS(1)	5			D
PS(1)	6			B
PS(1)	7			C
PS(1)	8			A
PW(1)	1			A,D
PW(1)	2			D
PW(1)	3			D
PW(1)	4			D
PW(1)	5			D
PW(1)	6			D
PY(1)	1			A
PY(1)	2			D
PY(1)	3			D
PY(1)	4			D
PY(1)	5			D
RA(1)	1			B
RA(1)	2	•		

Comment Letter	Comment	Type of Response: Individual	Topical	Standard
RA(1)	3			D
RA(1)	4	•		
RA(1)	5	•		
RA(1)	6	•		
RA(1)	7	•		
RA(1)	8			B
RA(1)	9	•		
RA(1)	10			C
RA(1)	11			D
RAW(1)	1			D
RB(1)	1			D
RB(1)	2			D
RB(1)	3			B
RC(1)	1			D
RC(1)	2			D
RC(1)	3			D
RD(1)	1			D
RD(1)	2			A
RD(1)	3			A
RE(1)	1			A
RE(1)	2			D
RE(1)	3			D
RE(1)	4			D
REBL(1)	1			D
REBL(1)	2			D
REBL(1)	3			D

Comment Letter	Comment	Type of Response: Individual	Topical	Standard
REM(1)	1			A
REM(1)	2			B
REM(1)	3			D
REM(1)	4			B
RES(1)	1			D
RES(1)	2			D
RES(1)	3			D
RES(1)	4			D
RES(1)	5			D
RES(1)	6			D
RES(1)	7			A
RES(1)	8			C
RF(1)	1			A
RF(1)	2			D
RH(1)	1			D
RH(1)	2			D
RH(1)	3			D
RH(1)	4			D
RHS(1)	1			D
RHS(1)	2			D
RHS(1)	3			D
RI(1)	1			A
RI(1)	2			D
RI(1)	3			A
RI(1)	4			A
RIA(1)	1			A
RIA(1)	2			D
RIA(1)	3			D
RIA(1)	4			C
RIA(1)	5			D
RIA(1)	6			D
RIA(1)	7			D
RIA(1)	8			D
RIA(1)	9			A
RIA(1)	10			B
RIA(1)	11			A,D
RIJ(1)	1			A
RIJ(1)	2			A
RIJ(1)	3			D
RIJ(1)	4			D
RK(1)	1			A
RK(1)	2			D
RK(1)	3			D
RK(1)	4			D
RK(1)	5			D
RK(1)	6			D
RK(1)	7			D
RL(1)	1			A
RL(1)	2	•		
RL(1)	3	•		
RL(1)	4	•		
RL(1)	5	•		
RL(1)	6			A
RL(1)	7			A
RM(1)	1			B
RM(1)	2	•		
RM(1)	3			B
RM(1)	4	•		
RM(1)	5			C
RM(1)	6			D
RO(1)	1			A
RO(1)	2			D
RO(1)	3			A
RO(1)	4			D
RO(1)	5			D
RO(1)	6			D
RO(1)	7			B
RO(1)	8			C
RO(1)	9			A
ROBH(1)	1			D
ROBH(1)	2			A
ROBH(1)	3			D
ROBR(1)	1			A
ROBR(1)	2			D
ROBR(1)	3			D
ROBR(1)	4			D
ROBR(1)	5			D
ROBR(1)	6			D
ROC(1)	1			D
ROC(1)	2			D
ROC(1)	3			D
ROC(1)	4			D
ROC(1)	5			D
ROD(1)	1			
ROD(1)	2			
ROH(1)	1			D
ROH(1)	2			D
ROH(1)	3			B
ROH(1)	4			B
ROH(1)	5			B
ROH(1)	6			A
ROL(1)	1			D
ROM(1)	1			D
ROM(1)	2			D
ROM(1)	3			D
ROM(1)	4			D
ROM(1)	5			D
ROM(1)	6			D
ROM(1)	7			D
ROR(1)	1			C
ROR(1)	2			A
ROR(1)	3			E
ROR(1)	4			B
ROR(1)	5			A

Comment Letter	Comment	Type of Response: Individual	Topical	Standard
ROR(1)	6	•		
ROR(1)	7	•		
ROR(1)	8			C
ROR(1)	9			D
ROS(1)	1			D
ROS(1)	2			D
ROW(1)	1			B
ROW(1)	2	•		
ROW(1)	3			C
ROW(1)	4	•		
ROW(1)	5			C
ROW(1)	6			A
ROYS(1)	1			A
ROYS(1)	2			C
ROYS(1)	3			C
ROYS(1)	4			A
ROYS(1)	5			D
ROYS(1)	6			D
ROYS(1)	7			D
ROYS(1)	8			D
ROYS(1)	9			D
ROYS(1)	10			C
ROYS(1)	11			D
ROYS(1)	12			D
ROYS(1)	13			D
ROYS(1)	14			C

Comment Letter	Comment	Type of Response: Individual	Topical	Standard
ROYS(1)	15			C
ROYS(1)	16			D
ROYS(1)	17			B
ROYS(1)	18			D
ROYS(2)	1			A
ROZ(1)	1			D
ROZ(1)	2			D
RP(1)	1			A
RP(1)	2	•		
RP(1)	3			A
RR(1)	1			D
RR(1)	2			D
RR(1)	3			D
RRE(1)	1			A
RRE(1)	2			D
RRE(1)	3			D
RRE(1)	4			D
RRE(1)	5			D
RRE(1)	6			D
RS(1)	1		D	
RS(1)	2			A
RS(1)	3			D
RS(1)	4			D
RS(1)	5	•		D
RS(1)	6			D
RS(1)	7			D

Comment Letter	Comment	Type of Response: Individual	Topical	Standard
RS(1)	8			D
RS(1)	9			D
RS(1)	10			A
RUA(1)	1			A
RUA(1)	2			D
RUA(1)	3			D
RUD(1)	1			D
RW(1)	1			A
RW(1)	2			D
RW(1)	3			B
RW(1)	4			D
RZ(1)	1			D
RZ(1)	2			D
RZ(1)	3			D
SA(1)	1			A
SA(1)	2			D
SA(1)	3			D
SA(1)	4			D
SA(1)	5			D
SA(1)	6			D
SA(1)	7			D
SA(1)	8			D
SA(1)	9			D
SA(1)	10			D
SA(1)	11			D
SA(1)	12			D

Comment Letter	Comment	Type of Response: Individual	Topical	Standard
SA(1)	13			D
SA(1)	14			D
SAA(1)	1			E
SAA(1)	2			A
SAA(1)	3			B
SAA(1)	4			D
SAS(1)	1			A
SAS(1)	2			D
SAS(1)	4			D
SAS1	3			D
SAW(1)	1			A
SAW(1)	2			A
SAW(1)	3			B
SAW(1)	4			A
SB(1)	1			D
SB(1)	2			D
SB(1)	3			D
SC(1)	1			D
SCB(1)	1			D
SCB(1)	2			D
SCG(1)	1			D
SCG(1)	2			D
SCG(1)	3			D
SCL(1)	1			D
SCL(1)	2			B
SCL(1)	3			B

Comment Letter	Comment	Type of Response: Individual	Type of Response: Topical	Type of Response: Standard
SCL(1)	4			C
SCL(1)	5			D
SE(1)	1			A
SE(1)	2			D
SE(1)	3			A
SE(1)	4			D
SE(1)	5			D
SE(1)	6			D
SE(1)	7			B
SE(1)	8			C
SE(1)	9			A
SF(1)	1			A
SF(1)	2			A
SF(1)	3			D
SF(1)	4			D
SF(1)	5			D
SF(1)	6			B
SF(1)	7			C
SF(1)	8			A
SG(1)	1			A
SG(1)	2			A
SG(1)	3			D
SG(1)	4			D
SG(1)	5			D
SG(1)	6			B
SG(1)	7			C

Comment Letter	Comment	Type of Response: Individual	Type of Response: Topical	Type of Response: Standard
SG(1)	8			A
SH(1)	1			A
SH(1)	2			D
SH(1)	3			D
SH(1)	4			D
SH(1)	5			D
SH(1)	6			D
SH(1)	7			D
SHA(1)	1			D
SHA(1)	2			D
SHF(1)	1			B
SHF(1)	2	•		
SHK(1)	1			D
SHK(1)	2			D
SHK(1)	3			A
SHP(1)	1			D
SHP(1)	2			A
SHP(1)	3			A,D
SHP(1)	4			D
SHS(1)	1			A
SHS(1)	2			D
SHS(1)	3			D
SHS(1)	4			D
SHS(1)	5			D
SHS(1)	6			D
SHS(1)	7			D

Comment Letter	Comment	Type of Response: Individual	Type of Response: Topical	Type of Response: Standard
SHS(1)	8			D
SHS(1)	9			D
SHS(1)	10			D
SHS(1)	11			D
SHS(1)	12			A,D
SHS(1)	13			D
SIH(1)	1			A
SIH(1)	2			B
SIH(1)	3			B
SIM(1)	1			A
SIM(1)	2			D
SIM(1)	3			D
SIM(1)	4			D
SIM(1)	5			D
SIM(1)	6			D
SK(1)	1			A
SK(1)	2			D
SK(1)	3	•		
SK(1)	4			A
SKH(1)	1			A
SKH(1)	2			D
SKH(1)	3			D
SKH(1)	4			A
SKH(1)	5			A
SKH(1)	6			D
SKH(1)	7			D

Comment Letter	Comment	Type of Response: Individual	Type of Response: Topical	Type of Response: Standard
SKH(1)	8			D
SKH(1)	9			A
SL(1)	1			A
SL(1)	2			D
SL(1)	3			D
SL(1)	4			C
SL(1)	5			D
SL(1)	6			D
SL(1)	7			D
SL(1)	8			D
SL(1)	9			D
SL(1)	10			D
SL(1)	11			D
SL(1)	12			D
SL(1)	13			D
SL(1)	14			D
SL(1)	15			D
SL(1)	16			D
SL(1)	17			D
SL(1)	18			D
SL(1)	19			D
SL(1)	20			D
SL(1)	21			D
SL(1)	22			D
SL(1)	23			D
SL(1)	24			D

Comment Letter	Comment	Type of Response: Individual	Topical	Standard
SL(1)	25			D
SL(1)	26			D
SL(1)	27			D
SL(1)	28			D
SL(1)	29			D
SL(1)	30			D
SL(1)	31			D
SL(1)	32			D
SL(1)	33			D
SL(1)	34			D
SL(1)	35			D
SL(1)	36			D
SL(1)	37			A
SL(1)	38			D
SL(1)	39			D
SL(1)	40			D
SL(1)	41			D
SL(1)	42			D
SL(1)	43			D
SL(1)	44			D
SL(1)	45			D
SL(1)	46			D
SL(1)	47			D
SL(1)	48			D
SL(1)	49			D
SL(1)	50			D
SL(1)	51			D
SL(1)	52			D
SL(1)	53			D
SL(1)	54			D
SL(1)	55			D
SL(1)	56			D
SL(1)	57			D
SL(1)	58			D
SL(1)	59			D
SL(1)	60			D
SL(1)	61			D
SL(1)	62			D
SL(1)	63			D
SL(1)	64			D
SL(1)	65			D
SL(1)	66			D
SL(1)	67			D
SL(1)	68			D
SL(1)	69			D
SL(1)	70			D
SL(1)	71			D
SL(1)	72			D
SL(1)	73			D
SL(1)	74	•		
SL(1)	75			A
SL(1)	76			D
SM(1)	1			D
SM(1)	2			D
SM(1)	3			D
SM(1)	4			D
SM(1)	5			D
SM(1)	6			D
SM(1)	7			A
SO(1)	1			A
SO(1)	2			D
SO(1)	3			A
SO(1)	4			D
SO(1)	5			D
SO(1)	6			D
SO(1)	7			B
SO(1)	8			C
SO(1)	9			A
SP(1)	1			A
SP(1)	2			B
SP(1)	3			A
SP(1)	4			A
SP(1)	5			B
SP(1)	6			D
SP(1)	7			E
SP(1)	8			A
SPET(1)	1			C
SPET(1)	2			D
SPET(1)	3			D
SPET(1)	4			A
SR(1)	1			B
SR(1)	2			B
SR(1)	3			E
SR(1)	4			B
SR(1)	5			D
SR(1)	6			D
SS(1)	1			A
SS(1)	2			A
SS(1)	3			D
SS(1)	4			D
SS(1)	5			D
SS(1)	6			B
SS(1)	7			C
SS(1)	8			A
ST(1)	1			D
ST(1)	2			B
STAH(1)	1			B
STAH(1)	2			C
STAH(1)	3			D
STAH(1)	4			D
STC(1)	1			D
STC(1)	2			D
STC(1)	3			D
STC(1)	4			A

Comment Letter	Comment	Type of Response: Individual	Topical	Standard
STG(1)	1			D
STG(1)	2			D
STG(1)	3			D
STG(1)	4			A
STH(1)	1			D
STH(2)	1			A
STH(2)	2			D
STH(2)	3			D
STH(2)	4			D
STH(2)	5		D	
STP(1)	1			A
STS(1)	1			D
STS(1)	2			D
STS(1)	3			A
SUC(1)	1			D
SUC(1)	2			D
SUC(1)	3			D
SUC(1)	4			A
SUG(1)	1			A
SUG(1)	2			A
SUG(1)	3			D
SUG(1)	4			D
SUG(1)	5			D
SUG(1)	6			B
SUG(1)	7			C
SUG(1)	8			A

Comment Letter	Comment	Type of Response: Individual	Topical	Standard
SUP(1)	1			B
SUP(1)	2			B
SUP(1)	3			B
SUP(1)	4			D
SUP(1)	5			B
SUS(1)	1			A
SUS(1)	2			A
SUS(1)	3	•		
SUS(1)	4			A
SUS(1)	5			B
SUW(1)	1			A
SUW(1)	2			D
SUW(1)	3			D
SUW(1)	4			D
SUW(1)	5			D
SUW(1)	6			D
SUW(1)	7			D
SUW(1)	8			D
SW(1)	1			D
SW(1)	2			D
SW(1)	3			D
SW(1)	4			A
SYH(1)	1			B
SYH(1)	2	•		
SYH(1)	3			B
SYH(1)	4	•		

Comment Letter	Comment	Type of Response: Individual	Topical	Standard
SYH(1)	5			C
SYH(1)	6			D
TB(1)	1			D
TB(1)	2			D
TB(1)	3			D
TB(1)	4			A
TB(1)	5			B
TB(1)	6			B
TB(1)	7			B
TB(1)	8			A
TB(2)	1			D
TB(2)	2			C
TE(1)	1			D
TE(1)	2			D
TEN(1)	1			A
TEN(1)	2			B
TEN(1)	3			D
TEN(1)	4			D
TER(1)	1			D
TER(1)	2			D
TH(1)	1			D
TH(1)	2	•		
TH(1)	3	•		
TH(2)	1			A
TH(2)	2			A
TH(2)	3			A

Comment Letter	Comment	Type of Response: Individual	Topical	Standard
TH(2)	4			A
TH(2)	5	•		
TH(2)	6			A
TH(2)	7			A
TH(2)	8			D
THH(1)	1			A
THH(1)	2			A
THH(1)	3			A
THH(1)	4			A
THH(1)	5			A
THR(1)	1			A
THR(1)	2		D	
THR(1)	3	•		
THR(1)	4			B
THR(1)	5			B
THR(1)	6	•		
THR(1)	7	•		
THR(1)	8	•		
THR(1)	9	•		
THR(1)	10			A
THR(1)	11	•		
THR(1)	12			A
THR(1)	13			A
THR(1)	14	•		
THR(1)	15	•		
THR(1)	16		D	

Comment Letter	Comment	Type of Response: Individual	Topical	Standard
THR(1)	17			A
THR(1)	18	•		
THR(1)	19			B
THR(1)	20	•		
THR(1)	21	•		
THR(1)	22	•		
THR(1)	23	•		
THR(1)	24			B
THR(1)	25			B
THR(1)	26			D
THR(1)	27			D
THR(1)	28	•		
THR(1)	29			D
THR(1)	30			D
THR(1)	31			D
THR(1)	32	•		
THR(1)	33	•		
THR(1)	34	•		
THR(1)	35		D	
THR(1)	36			D
THR(1)	37		D	
THR(1)	38			D
THR(1)	39			D
THR(1)	40			D
THR(1)	41			D
THR(1)	42	•		
THR(1)	43			A
THR(1)	44			A
TN(1)	1			B
TN(1)	2			D
TN(1)	3			D
TN(1)	4			C
TN(1)	5			D
TN(1)	6			D
TOH(1)	1			D
TOH(1)	2			B
TOH(1)	3			B
TOH(1)	4			B
TOH(1)	5			D
TOMH(1)	1			D
TOMH(1)	2			D
TOPA(1)	1			D
TR(1)	1			B
TR(1)	2			A
TR(1)	3			E
TS(1)	1			D
TS(1)	2			D
TS(1)	3			B
TT(1)	1			A
TT(1)	2			D
TT(1)	3			D
TT(2)	1			D
TT(3)	1			A
TT(3)	2			A
TT(3)	3			A
TT(3)	4			D
TT(3)	5			D
TT(3)	6			A
TT(3)	7			A
TW(1)	1			D
TW(1)	2			D
UNREAD(01)	1			D
UNREAD(02)	1			A
UNREAD(03)	1			D
UNREAD(03)	2			D
UNREAD(04)	1			A
UNREAD(04)	2			D
UNREAD(04)	3			A
UNREAD(04)	4			D
UNREAD(04)	5			D
UNREAD(04)	6			B
UNREAD(04)	7			C
UNREAD(04)	8			A
UNREAD(05)	1			A
UNREAD(05)	2			D
UNREAD(05)	3			A
UNREAD(05)	4			D
UNREAD(05)	5			D
UNREAD(05)	6			D
UNREAD(05)	7			B
UNREAD(05)	8			C
UNREAD(05)	9			A
UNREAD(06)	1			D
UNREAD(06)	2			D
UNREAD(06)	3			D
UNREAD(06)	4			D
UNREAD(06)	5			D
UNREAD(07)	1			A
UNREAD(07)	2			D
UNREAD(07)	3	•		
UNREAD(07)	4			A
UNREAD(08)	1			D
UNREAD(08)	2			D
UNREAD(08)	3			D
UNREAD(09)	1			A
UNREAD(09)	2			D
UNREAD(09)	3			D
UNREAD(10)	1			A
UNREAD(10)	2			D
UNREAD(10)	3			A
UNREAD(10)	4			D
UNREAD(10)	5			D
UNREAD(10)	6			D
UNREAD(10)	7			B

Comment Letter	Comment	Type of Response: Individual	Topical	Standard
UNREAD(10)	8			C
UNREAD(10)	9			A
UNREAD(11)	1			A
UNREAD(11)	2			D
UNREAD(11)	3			D
UNREAD(11)	4			A
UNREAD(12)	1			D
UNREAD(12)	2			B
UNREAD(12)	3			D
UNREAD(13)	1			A
UNREAD(13)	2			D
UNREAD(13)	3			A
UNREAD(13)	4			D
UNREAD(13)	5			D
UNREAD(13)	6			D
UNREAD(13)	7			B
UNREAD(13)	8			C
UNREAD(13)	9			A
UNREAD(14)	1			A
UNREAD(14)	2			D
UNREAD(14)	3	•		
UNREAD(14)	4			A
UNREAD(15)	1			A
UNREAD(15)	2			D
UNREAD(15)	3	•		
UNREAD(15)	4			A

Comment Letter	Comment	Type of Response: Individual	Topical	Standard
UNREAD(16)	1			A
UNREAD(16)	2			D
UNREAD(16)	3	•		
UNREAD(16)	4			A
UNREAD(17)	1			D
UNREAD(17)	2			D
UNREAD(17)	3			C
UNREAD(17)	4			D
UNREAD(17)	5			D
UNREAD(17)	6			B
UNREAD(17)	7			A
UNREAD(17)	8			D
UNREAD(18)	1			D
UNREAD(18)	2			D
UNREAD(19)	1			A
UNREAD(19)	2			D
UNREAD(19)	3			D
UNREAD(19)	4			D
UNREAD(20)	1			A
UNREAD(20)	2			D
UNREAD(20)	3			A
UNREAD(20)	4			D
UNREAD(20)	5			D
UNREAD(20)	6			D
UNREAD(20)	7			B
UNREAD(20)	8			C

Comment Letter	Comment	Type of Response: Individual	Topical	Standard
UNREAD(20)	9			A
UNREAD(21)	1			A
UNREAD(21)	2			A
UNREAD(21)	3			D
UNREAD(21)	4			D
UNREAD(21)	5			D
UNREAD(21)	6			B
UNREAD(21)	7			C
UNREAD(21)	8			A
UNREAD(22)	1			B
UNREAD(22)	2	•		
UNREAD(22)	3			B
UNREAD(22)	4	•		
UNREAD(22)	5			C
UNREAD(22)	6			A,D
UNREAD(23)	1			A
UNREAD(23)	2			E
UNREAD(23)	3			B
UNREAD(23)	4			A
UNREAD(23)	5			A,C
UNREAD(24)	1			D
UNREAD(24)	2			D
UNREAD(24)	3			D
UNREAD(25)	1			A
UNREAD(25)	2			A
UNREAD(25)	3		B	

Comment Letter	Comment	Type of Response: Individual	Topical	Standard
UNREAD(25)	4	•		
UNREAD(25)	5			D
UNREAD(25)	6			E
UNREAD(26)	1			A
UNREAD(26)	2			D
UNREAD(26)	3	•		
UNREAD(26)	4	•		
UNREAD(26)	5			D
UNREAD(27)	1			A
UNREAD(27)	2			D
UNREAD(27)	3			A
UNREAD(27)	4			D
UNREAD(27)	5			D
UNREAD(27)	6			D
UNREAD(27)	7			B
UNREAD(27)	8			C
UNREAD(27)	9			A
UNREAD(28)	1	•		
UNREAD(28)	2	•		
UNREAD(28)	3	•		
UNREAD(29)	1			D
UNREAD(29)	2			D
UNREAD(30)	1			A
UNREAD(30)	2			D
UNREAD(30)	3	•		
UNREAD(30)	4			A

Comment Letter	Comment	Type of Response: Individual	Topical	Standard
UNREAD(31)	1			A
UNREAD(31)	2			D
UNREAD(31)	3			A
UNREAD(31)	4			D
UNREAD(31)	5			D
UNREAD(31)	6			D
UNREAD(31)	7			B
UNREAD(31)	8			C
UNREAD(31)	9			A
UNREAD(32)	1			A
UNREAD(32)	2			D
UNREAD(32)	3			D
UNREAD(32)	4			D
UNREAD(33)	1			A
UNREAD(33)	2			D
UNREAD(33)	3	•		
UNREAD(33)	4			A
UNREAD(34)	*			
UNREAD(35)	1			
UNREAD(35)	2			
UNREAD(36)	1			A
UNREAD(36)	2			D
UNREAD(36)	3			A
UNREAD(36)	4			D
UNREAD(36)	5			D
UNREAD(36)	6			D
UNREAD(36)	7			B
UNREAD(36)	8			C
UNREAD(36)	9			A
UNREAD(37)	1			A
UNREAD(37)	2			D
UNREAD(37)	3			A
UNREAD(37)	4			D
UNREAD(37)	5			D
UNREAD(37)	6			D
UNREAD(37)	7			B
UNREAD(37)	8			C
UNREAD(37)	9			A
UNREAD(38)	1			D
UNREAD(38)	2			D
UNREAD(39)	1			A
UNREAD(39)	2			D
UNREAD(39)	3			A
UNREAD(39)	4			D
UNREAD(39)	5			D
UNREAD(39)	6			D
UNREAD(39)	7			B
UNREAD(39)	8			C
UNREAD(39)	9			A
UNREAD(40)	1			A
UNREAD(40)	2			D
UNREAD(40)	3			A
UNREAD(40)	4			D
UNREAD(40)	5			D
UNREAD(40)	6			D
UNREAD(40)	7			B
UNREAD(40)	8			C
UNREAD(40)	9			A
UNREAD(41)	1			A
UNREAD(41)	2			D
UNREAD(41)	3			D
UNREAD(41)	4			A
UNREAD(41)	5			D
UNREAD(42)	1			A
UNREAD(42)	2			A
UNREAD(42)	3			D
UNREAD(42)	4			D
UNREAD(42)	5			D
UNREAD(42)	6			B
UNREAD(42)	7			C
UNREAD(42)	8			A
UNREAD(43)	1			D
UNREAD(43)	2			D
UNREAD(44)	1			D
UNREAD(44)	2			D
UNREAD(45)	1			D
UNREAD(45)	2			D
UNREAD(46)	1			A
UNREAD(46)	2			D
UNREAD(46)	3			A
UNREAD(46)	4			D
UNREAD(46)	5			D
UNREAD(46)	6			D
UNREAD(46)	7			B
UNREAD(46)	8			C
UNREAD(46)	9			A
UNREAD(47)	1			A
UNREAD(47)	2			D
UNREAD(47)	3			A
UNREAD(47)	4			D
UNREAD(47)	5			D
UNREAD(47)	6			D
UNREAD(47)	7			B
UNREAD(47)	8			C
UNREAD(47)	9			A
UNREAD(48)	1			A
UNREAD(48)	2			A
UNREAD(48)	3			D
UNREAD(48)	4			D
UNREAD(48)	5			D
UNREAD(48)	6			B
UNREAD(48)	7			C
UNREAD(48)	8			A
UNREAD(49)	1			A

Comment Letter	Comment	Type of Response: Individual	Topical	Standard
UNREAD(49)	2			A
UNREAD(49)	3			D
UNREAD(49)	4			D
UNREAD(49)	5			D
UNREAD(49)	6			B
UNREAD(49)	7			C
UNREAD(49)	8			A
UNREAD(50)	1			A
UNREAD(50)	2			A
UNREAD(50)	3			D
UNREAD(50)	4			D
UNREAD(50)	5			D
UNREAD(50)	6			B
UNREAD(50)	7			C
UNREAD(50)	8			A
UNREAD(51)	1			A
UNREAD(51)	2			A
UNREAD(51)	3			D
UNREAD(51)	4			D
UNREAD(51)	5			D
UNREAD(51)	6			B
UNREAD(51)	7			C
UNREAD(51)	8			A
UNREAD(52)	1			A
UNREAD(52)	2			A
UNREAD(52)	3			D
UNREAD(52)	4			D
UNREAD(52)	5			D
UNREAD(52)	6			B
UNREAD(52)	7			C
UNREAD(52)	8			A
UNREAD(53)	1			A
UNREAD(53)	2			A
UNREAD(53)	3			D
UNREAD(53)	4			D
UNREAD(53)	5			D
UNREAD(53)	6			B
UNREAD(53)	7			C
UNREAD(53)	8			A
UNREAD(54)	1			A
UNREAD(54)	2			A
UNREAD(54)	3			D
UNREAD(54)	4			D
UNREAD(54)	5			D
UNREAD(54)	6			B
UNREAD(54)	7			C
UNREAD(54)	8			A
VG(1)	1			A
VG(1)	2			D
VG(1)	3			D
VG(1)	4			D
WA(1)	1			A
WA(1)	2			D
WA(1)	3			D
WA(1)	4			D
WA(1)	5			D
WA(1)	6			D
WA(1)	7			C
WA(1)	8			D
WA(1)	9			D
WB(1)	1			E
WB(1)	2			E
WB(1)	3	*		
WB(1)	4			C
WB(1)	5			A
WB(1)	6			B
WB(1)	7			A
WEA(1)	1			A
WEA(1)	2			D
WEA(1)	3			A
WEA(1)	4			D
WEA(1)	5			D
WEA(1)	6			D
WEA(1)	7			B
WEA(1)	8			C
WEA(1)	9			A
WG(1)	1			A
WG(1)	2			A
WG(1)	3			A
WIB(1)	1			A
WIB(1)	2			D
WIB(1)	3			D
WIB(1)	4			A
WIB(1)	5			B
WIM(1)	1			A
WIM(1)	2			A
WIM(1)	3			A
WIM(1)	4			A
WIM(1)	5			B
WIM(1)	6			A
WIM(1)	7			A
WIM(1)	8			C
WK(1)	1			D
WK(1)	2			D
WK(1)	3			D
WK(1)	4			A
WM(1)	1			A
WM(1)	2			A
WM(1)	3			A,C
WM(1)	4			C
WM(1)	5			A
WM(1)	6			B
WM(1)	7			A
WM(1)	8			A

Comment Letter	Comment	Type of Response: Individual	Topical	Standard
WM(1)	9			A
WM(1)	10			A
WM(1)	11			B
WM(1)	12			A
WO(1)	1			B
WO(1)	2	•		
WO(1)	3			B
WO(1)	4	•		
WO(1)	5			A
WO(1)	6			D
WW(1)	1			A
WY(1)	1			D
WY(1)	2			D
WY(1)	3			D
WY(1)	4			B
WY(1)	5			D
WY(1)	6			C
WY(1)	7			C
WY(1)	8			D
WY(1)	9			D
WY(1)	10			D
WY(1)	11			D
WYM(1)	1			D
WYM(1)	2			D
WYM(1)	3			D
YS(1)	1			D

Comment Letter	Comment	Type of Response: Individual	Topical	Standard
YV(1)	1			D
YV(1)	2			D
YV(1)	3			D
YV(1)	4			D
YV(1)	5			D
PA(1)	*			A
PB(1)	*			A
PC(1)	*			A
PD(1)	*			A
PE(1)	*			A
PF(1)	*			A
PG(1)	*			A
PH(1)	*			A
PI(1)	*			A
PJ(1)	*			A
PK(1)	*			A
PL(1)	*			A
PM(1)	*			A
PN(1)	*			A
PO(1)	*			A
T (1)	1			A
T (1)	2			A
T (1)	3			A,D
T (1)	4			A,D
T (1)	5			D
T (1)	6			C

Comment Letter	Comment	Type of Response: Individual	Topical	Standard
T (1)	7			A,D
T (1)	8			D
T (1)	9			D
T (1)	10			C
T (1)	11			B
T (1)	12			A
T (1)	13			D
T (1)	14			A
T (1)	15			A
T (1)	16			D
T (1)	17			B
T (1)	18			A
T (1)	19			A
T (1)	20			B
T (1)	21			B
T (1)	22			D
T (1)	23			B
T (1)	24			A
T (1)	25			A
T (1)	26			E
T (1)	27			B
T (1)	28			B
T (1)	29			C
T (1)	30			D
T (1)	31			B
T (1)	32			E

Comment Letter	Comment	Type of Response: Individual	Topical	Standard
T (1)	33			D
T (1)	34			C
T (1)	35			D
T (1)	36			A
T (1)	37			D
T (1)	38			A
T (1)	39			A
T (1)	40			A
T (1)	41			B
T (1)	42			B
T (1)	43			D
T (1)	44			A
T (1)	45	•		
T (1)	46			B
T (1)	47			A
T (1)	48			B
T (1)	49			A
T (1)	50			A
T (1)	51			D
T (1)	52			B
T (1)	53			A
T (1)	54			D
T (1)	55			B
T (1)	56			A
T (1)	57			D
T (1)	58			E

Comment Letter	Comment	Type of Response: Individual	Topical	Standard
T (1)	59			A
T (1)	60			A
T (1)	61			E
T (1)	62			D
T (1)	63			D
T (1)	64			D
T (1)	65			B
T (1)	66			B
T (1)	67			B
T (1)	68			A
T (1)	69			A
T (1)	70			A
T (1)	71			B
T (1)	72			B
T (1)	73			D
T (1)	74			D
T (1)	75			D
T (1)	76			D
T (1)	77			A
T (1)	78			E
T (1)	79			A
T (1)	80			B,C
T (1)	81			D
T (1)	82			B
T (1)	83			B
T (1)	84			D
T (1)	85			A
T (1)	86			B
T (1)	87			E
T (1)	88			B
T (1)	89			B
T (1)	90			B
T (1)	91			B
T (1)	92			A
T (1)	93			A
T (1)	94			B
T (1)	95	•		
T (1)	96			D
T (1)	97			E
T (1)	98			B
T (1)	99			A
T (1)	100			A
T (1)	101			B
T (1)	102			B
T (1)	103			B
T (1)	104			B
T (1)	105			A
T (1)	106			A
T (1)	107			B
T (1)	108			D
T (1)	109			D
T (1)	110			C
T (1)	111			B
T (1)	112			B
T (1)	113			A
T (1)	114			A
T (1)	115			B
T (1)	116			B
T (1)	117			B
T (1)	118			D
T (1)	119			D
T (1)	120			D
T (1)	121			A
T (1)	122			A
T (1)	123			A
T (1)	124			B
T (1)	125			D
T (1)	126			D
T (1)	127			E
T (1)	128			D
T (1)	129			A
T (1)	130			A
T (1)	131			B
T (1)	132			B
T (1)	133		D	
T (1)	134			A
T (1)	135			D
T (1)	136			D
T (1)	137			D
T (1)	138			B
T (1)	139			D
T (1)	140			A
T (1)	141			A
T (1)	142			A
T (1)	143			D
T (1)	144			B
T (1)	145			B
T (1)	146			B
T (1)	147			B
T (1)	148			A
T (1)	149			A
T (1)	150			A
T (1)	151			D
T (1)	152			D
T (1)	153			D
T (1)	154			D
T (1)	155			D
T (1)	156			D
T (1)	157			D
T (1)	158			A
T (1)	159			A
T (1)	160			B
T (1)	161	•		
T (1)	162			E

Comment Letter	Comment	Type of Response: Individual	Topical	Standard
T (1)	163			D
T (1)	164			B
T (1)	165			B
T (1)	166			B
T (1)	167	•		
T (1)	168			D
T (1)	169			D
T (1)	170			A
T (1)	171			A
T (1)	172			B
T (1)	173		D	
T (1)	174			B
T (1)	175			D
T (1)	176			D
T (1)	177			A
T (1)	178			A
T (1)	179			A
T (1)	180			D
T (1)	181			D
T (1)	182			E
T (1)	183			B
T (1)	184			A
T (1)	185			A
T (1)	186			D
T (1)	187			C
T (1)	188			D

Comment Letter	Comment	Type of Response: Individual	Topical	Standard
T (1)	189			D
T (1)	190			B
T (1)	191	*		
T (1)	192	*		
T (1)	193			A
T (1)	194			A
T (1)	195			A
T (1)	196			B
T (1)	197			B
T (1)	198			B
T (1)	199			D
T (1)	200			D
T (1)	201			B
T (1)	202			B
T (1)	203			A
T (1)	204			A
T (1)	205			B
T (1)	206			B
T (1)	207			E
T (1)	208		D	
T (1)	209			A
T (1)	210			A
T (1)	211			B
T (1)	212			A
T (1)	213			A
T (1)	214			B

Comment Letter	Comment	Type of Response: Individual	Topical	Standard
T (1)	215			B
T (1)	216			A
T (1)	217	•		
T (1)	218			C
T (1)	219			D
T (1)	220			A
T (1)	221			A
T (1)	222			A
T (1)	223	•		
T (1)	224			D
T (1)	225			D
T (1)	226			A
T (1)	227			A
T (1)	228			A,D
T (1)	229			D
T (1)	230			D
T (1)	231			D
T (1)	232			D
T (1)	233			D
T (1)	234			A
T (1)	235			C
T (1)	236			B
T (1)	237			A
T (1)	238			B
T (1)	239			D
T (1)	240			A,B

Comment Letter	Comment	Type of Response: Individual	Topical	Standard
T (1)	241	•		
T (1)	242			D
T (1)	243			A
T (1)	244			D
T (1)	245			B
T (1)	246			D
T (1)	247			B
T (1)	248			A
T (1)	249			D
T (1)	250			A
T (1)	251			A
T (1)	252			C
T (1)	253			A,D
T (1)	254			B
T (1)	255			D
T (1)	256			D
T (1)	257			D
T (1)	258			B
T (1)	259			D
T (1)	260			A
T (2)	1			A
T (2)	2			A
T (2)	3			D
T (2)	4			D
T (2)	5			C
T (2)	6			B

Comment Letter	Comment	Type of Response: Individual	Topical	Standard
T (2)	7			B
T (2)	8			A
T (2)	9			A
T (2)	10			A,D
T (2)	11			E
T (2)	12			B
T (2)	13			A
T (2)	14			A
T (2)	15			A
T (2)	16			C
T (2)	17			A,B
T (2)	18	•		
T (2)	19			A,C
T (2)	20			D
T (2)	21			D
T (2)	22			B
T (2)	23			B
T (2)	24			A
T (2)	25			A
T (2)	26			C
T (2)	27			D
T (2)	28			A
T (2)	29			A
T (2)	30			C
T (2)	31			D
T (2)	32			D
T (2)	33			D
T (2)	34			A
T (2)	35			A
T (2)	36			D
T (2)	37			D
T (2)	38			A
T (2)	39			A
T (2)	40			B
T (2)	41			A
T (2)	42			D
T (2)	43			D
T (2)	44			B
T (2)	45			D
T (2)	46			C
T (2)	47	•		
T (2)	48			A
T (2)	49	•		
T (2)	50			D
T (2)	51			A
T (2)	52			A
T (2)	53			D
T (2)	54			D
T (2)	55			D
T (2)	56			A
T (2)	57			D
T (2)	58			D
T (2)	59			D
T (2)	60			A
T (2)	61			A
T (2)	62			B
T (2)	63			A
T (2)	64			A
T (2)	65			A
T (2)	66			D
T (2)	67			D
T (2)	68			B
T (2)	69			D
T (2)	70			D
T (2)	71			B
T (2)	72			A
T (2)	73			A
T (2)	74			A
T (2)	75			A
T (2)	76			D
T (2)	77			D
T (2)	78			A
T (2)	79			A
T (2)	80			D
T (2)	81			D
T (2)	82			D
T (2)	83			D
T (2)	84			A
T (2)	85			A
T (2)	86			D
T (2)	87			D
T (2)	88			D
T (2)	89			D
T (2)	90			D
T (2)	91			C
T (2)	92			D
T (2)	93			D
T (2)	94			A
T (2)	95			A
T (2)	96			D
T (2)	97			D
T (2)	98			C
T (2)	99			D
T (2)	100			D
T (2)	101			A
T (2)	102			D
T (2)	103			B,D
T (2)	104			D
T (2)	105			A
T (2)	106			D
T (2)	107			A
T (2)	108			D
T (2)	109			A
T (2)	110			A

Comment Letter	Comment	Type of Response: Individual	Topical	Standard
T (2)	111			C
T (2)	112			A
T (2)	113			A
T (2)	114			A
T (2)	115			B
T (2)	116			A
T (2)	117			A
T (2)	118			A
T (2)	119			B
T (2)	120			D
T (2)	121			C
T (2)	122			A
T (2)	123			A
T (2)	124			D
T (2)	125			A
T (2)	126			A
T (2)	127			D
T (2)	128			D
T (2)	129			D
T (2)	130			D
T (2)	131			A
T (2)	132			A
T (2)	133			A
T (2)	134			A
T (2)	135			A
T (2)	136			D
T (2)	137			D
T (2)	138			D
T (2)	139			A
T (2)	140			A
T (2)	141			D
T (2)	142			D
T (2)	143			D
T (2)	144			A
T (2)	145			A
T (2)	146			D
T (2)	147			D
T (2)	148			D
T (2)	150			A
T (2)	151			A
T (2)	152			D
T (2)	153			D
T (2)	154			D
T (2)	155			D
T (2)	156			D
T (2)	157			A
T (2)	158			A
T (2)	159			A
T (2)	160			B
T (2)	161			D
T (2)	162			B
T (2)	163			C
T (2)	164			D
T (2)	165			B
T (2)	166			B
T (2)	167			D
T (2)	168			D
T (2)	169			A
T (2)	170			A
T (2)	171	•		
T (2)	172			D
T (2)	173			A
T (2)	174			A,D
T (2)	175	•		
T (2)	176			D
T (2)	177			B
T (2)	178			A
T (2)	179			A
T (2)	180			D
T (2)	181			A
T (2)	182			A
T (2)	183			C
T (2)	184			D
T (2)	185			C
T (2)	186			C
T (2)	187			A
T (2)	188			A
T (2)	189			B
T (2)	190			D
T (2)	191			A
T (2)	192			A
T (2)	193			A
T (2)	194			A
T (2)	195			D
T (2)	196			C
T (2)	197			D
T (2)	198			D
T (2)	199			D
T (2)	200			D
T (2)	201			D
T (2)	202			B,D
T (2)	203			D
T (2)	204			A
T (2)	205			A
T (2)	206			B
T (2)	207			B
T (2)	208			D
T (2)	209			D
T (2)	210			B
T (2)	211			A
T (2)	212			A
T (2)	106a			D
T (2)	106b			C
T (2)	106c			D

Comment Letter	Comment	Type of Response: Individual	Topical	Standard
T (2)	106d			A
T (3)	1			A
T (3)	2			A
T (3)	3			D
T (3)	4			B
T (3)	5			B
T (3)	6			B
T (3)	7			B
T (3)	8			A
T (3)	9			A
T (3)	10			B
T (3)	11			E
T (3)	12			E
T (3)	13			C
T (3)	14			C
T (3)	15			C
T (3)	16			D
T (3)	17			A
T (3)	18			B
T (3)	19			D
T (3)	20			A
T (3)	21			A
T (3)	22			B
T (3)	23			A
T (3)	24			B
T (3)	25			B
T (3)	26			D
T (3)	27			D
T (3)	28			D
T (3)	29			D
T (3)	30			D
T (3)	31			A
T (3)	32			A
T (3)	33			A
T (3)	34			A
T (3)	35	•		
T (3)	36			D
T (3)	37			A
T (3)	38	•		
T (3)	39	•		
T (3)	40	•		
T (3)	41			A
T (3)	42			A
T (3)	43			D
T (3)	44			B
T (3)	45			D
T (3)	46			B
T (3)	47			D
T (3)	48			A
T (3)	49			A
T (3)	50			D
T (3)	51	•		
T (3)	52			A
T (3)	53			A,C
T (3)	54	•		
T (3)	55			A
T (3)	56			B,D
T (3)	57			A
T (3)	58			A
T (3)	59			A
T (3)	60			B
T (3)	61			B
T (3)	62			D
T (3)	63			D
T (3)	64			B
T (3)	65			A
T (3)	66			A
T (3)	67			D
T (3)	68			B
T (3)	69			B
T (3)	70			D
T (3)	71			D
T (3)	72			A
T (3)	73			D
T (3)	74			A
T (3)	75			D
T (3)	76			D
T (3)	77			A
T (3)	78			A
T (3)	79			A
T (3)	80			D
T (3)	81			B
T (3)	82			C
T (3)	83			B
T (3)	84			A
T (3)	85			D
T (3)	86			D
T (3)	87			C
T (3)	88			A
T (3)	89			C
T (3)	90			B
T (3)	91			D
T (3)	92			D
T (3)	93			A
T (3)	94			D
T (3)	95			B
T (3)	96			B
T (3)	97			D
T (3)	98			D
T (3)	99			D
T (3)	100			A
T (3)	101			A
T (3)	102			B
T (3)	103			A

Comment Letter	Comment	Type of Response: Individual	Topical	Standard
T (3)	104			A
T (3)	105			A
T (3)	106			D
T (3)	107			C
T (3)	108			E
T (3)	109			D
T (3)	110			B
T (3)	111			A
T (3)	112			A
T (3)	113			D
T (3)	114			B
T (3)	115			A
T (3)	116			D
T (3)	117			D
T (3)	118			A
T (3)	119			A
T (3)	120			D
T (3)	121			D
T (3)	122			E
T (3)	123	•		
T (3)	124			B
T (3)	125			B
T (3)	126			B
T (3)	127			D
T (3)	128			A
T (3)	129			D
T (3)	130			D
T (3)	131			B
T (3)	132			D
T (3)	133			A
T (3)	134			D
T (3)	135			B
T (3)	136			D
T (3)	137			A
T (3)	138			A
T (3)	139			D
T (3)	140			D
T (3)	141			D
T (3)	142			A
T (3)	143			A
T (3)	144			D
T (3)	145			D
T (3)	146	•		
T (3)	147			D
T (3)	148			A
T (3)	149			A
T (3)	150			D
T (3)	151			B
T (3)	152			A
T (3)	153			B
T (3)	154			B
T (3)	155			D
T (3)	156			A
T (3)	157			A
T (3)	158			D
T (3)	159			A
T (3)	160			A
T (3)	161			D
T (3)	162			D
T (3)	163			D
T (3)	164			D
T (3)	165			D
T (3)	166			A
T (3)	167			A
T (3)	168			D
T (3)	169			D
T (3)	170			D
T (3)	171			A
T (3)	172			A
T (3)	173	•		
T (3)	174			D
T (3)	175			D
T (3)	176			C
T (3)	177			D
T (3)	178			D
T (3)	179			A
T (3)	180			D
T (3)	181			B,D
T (3)	182			B
T (3)	183			C
T (3)	184			D
T (3)	185			D
T (3)	186			A
T (3)	187			A
T (3)	188			D
T (3)	189			D
T (3)	190			B
T (3)	191			A
T (3)	192			D
T (3)	193			D
T (3)	194			A
T (3)	195			D
T (3)	196			A
T (3)	197			A
T (3)	198			B
T (3)	199			A
T (3)	200			D
T (3)	201			E
T (3)	202			A
T (3)	203			A
T (3)	204			A
T (3)	205			A
T (3)	206			A
T (3)	207			D

Comment Letter	Comment	Type of Response: Individual	Topical	Standard
T (3)	208			D
T (3)	209			A
T (3)	210			D
T (3)	211			A
T (3)	212			A
T (3)	213			B
T (3)	214	•		
T (3)	215			B
T (3)	216	•		
T (3)	217			B
T (3)	218			E
T (3)	219			A
T (3)	220			A
T (3)	221			D
T (3)	222			A
T (3)	223			A
T (3)	224			D
T (3)	225			D
T (3)	226			A
T (3)	227			A
T (3)	228			A
T (3)	229			B
T (3)	230			D
T (3)	231			D
T (3)	232			D
T (3)	233			D
T (3)	234			D
T (3)	235			A
T (3)	236			A
T (3)	237			B
T (3)	238			D
T (3)	239			B
T (3)	240			B,D
T (3)	241			A,D
T (3)	242			A
T (3)	243			A
T (3)	244			A
T (3)	245			C,D
T (3)	246			B
T (3)	247			A
T (3)	248			B
T (3)	249			B
T (3)	250			D
T (3)	251			D
T (3)	252			A
T (3)	253			A
T (3)	254			A
T (3)	255			B
T (3)	256			D
T (3)	257			D
T (3)	258			A
T (3)	259			A
T (3)	260			B
T (3)	261			D
T (3)	262			B
T (3)	263			A
T (3)	264			E
T (3)	265			B
T (3)	266			A
T (3)	267			A
T (3)	268			A
T (3)	269			E
T (3)	270			B
T (3)	271			D
T (3)	272			B
T (3)	273			A
T (3)	274			A
T (3)	275			D
T (3)	276			A
T (3)	277			A
T (3)	278			D
T (3)	279			D
T (3)	280			D
T (3)	281			D
T (3)	282			B
T (3)	283			D
T (3)	284			D
T (3)	285			D
T (3)	286			A
T (3)	287			A
T (3)	288			D
T (3)	289			D
T (3)	290			B
T (3)	291			D
T (3)	292			D
T (3)	293			B
T (3)	294			A
T (3)	295			A
T (3)	296			B
T (3)	297			D
T (3)	298			B
T (3)	299			A
T (3)	300			A
T (3)	301			A
T (3)	302			B
T (3)	303			D
T (3)	304			D
T (3)	305			A
T (3)	306			A
T (3)	307			D
T (3)	308			D
T (3)	309			D
T (3)	310			D
T (3)	311			D

Comment Letter	Comment	Type of Response: Individual	Topical	Standard
T (3)	312			A
T (3)	313			A
T (3)	314			D
T (3)	315			B
T (3)	316			D
T (3)	317			B
T (3)	318			D
T (3)	319			B
T (3)	320			B
T (3)	321			D
T (3)	322			A
T (3)	323			A
T (3)	324			D
T (3)	325			B
T (3)	326			B
T (3)	327			D
T (3)	328			B
T (3)	329			B
T (3)	330		D	
T (3)	331			D
T (3)	332			A
T (3)	333			C
T (3)	334			A
T (3)	335			A
T (3)	336			D
T (3)	337			C
T (3)	338			B
T (3)	339			A
T (3)	340			A
T (3)	341			D
T (3)	342			D
T (3)	343			D
T (3)	344			D
T (3)	345			D
T (3)	346			D
T (3)	347			A
T (3)	348			A
T (3)	349			B
T (3)	350			D
T (3)	351			D
T (3)	352			D
T (3)	353			A
T (3)	354			A
T (3)	355			D
T (3)	356			D
T (3)	357			C,D
T (3)	358			A
T (3)	359			A
T (3)	360			B
T (3)	361			B
T (3)	362			D
T (3)	363			A
T (3)	364			A
T (3)	365			C
T (3)	366			D
T (3)	367			C
T (3)	368			B,D
T (3)	369			A
T (3)	370			A
T (3)	371			D
T (3)	372			D
T (3)	373			D
T (3)	374			A
T (3)	375			A
T (3)	376			B
T (3)	377			D
T (3)	378			D
T (3)	379			D
T (3)	380			D
T (3)	381			D
T (3)	382			B
T (3)	383			A
T (3)	384			A
T (3)	385			D
T (3)	386			D
T (3)	387			A
T (3)	388			A
T (3)	389			D
T (3)	390			D
T (3)	391			D
T (3)	392			D
T (3)	393			B
T (3)	394			D
T (3)	395			A
T (3)	396			A
T (3)	397			D
T (3)	398			D
T (3)	399			D
T (3)	400			D
T (3)	401			A
T (3)	402			A
T (3)	403			D
T (3)	404			D
T (3)	405			D
T (3)	406			A
T (3)	407			A
T (3)	408			B,D
T (3)	409			B
T (3)	410			D
T (3)	411			D
T (3)	412	*	D	
T (3)	413			D
T (3)	414			A
T (3)	415			D

Comment Letter	Comment	Type of Response: Individual	Topical	Standard
T (3)	416			A
T (3)	417			A
T (3)	418			A
T (3)	419			D
T (3)	420	•		
T (3)	421	•		
T (3)	422			E
T (3)	423	D		
T (3)	424			D
T (3)	425			B
T (3)	426			A
T (3)	427			D
T (3)	428			A
T (3)	429			A
T (3)	430			B,D
T (3)	431			B
T (3)	432			A,C
T (3)	433			A
T (3)	434			B
T (3)	435			A
T (3)	436			D
T (3)	437			D
T (3)	438			D
T (3)	439			B
T (3)	440			D
T (3)	441			D
T (3)	442			D
T (3)	443			A
T (3)	444			D
T (3)	445			B
T (3)	446			D
T (3)	447			B
T (3)	448			A
T (3)	449			A
T (3)	450			D
T (3)	451			D
T (3)	452			D
T (3)	453			B
T (3)	454			A
T (3)	455			A
T (3)	456			A
T (3)	457			D
T (3)	458	•		
T (3)	459			A
T (3)	460			D
T (3)	461			A
T (3)	462			A
T (3)	463			B
T (3)	464			D
T (3)	465			B
T (3)	466			A
T (3)	467			B
T (3)	468			B
T (3)	469			B
T (3)	470			A
T (3)	471			A
T (3)	472			D
T (3)	473			D
T (3)	474			D
T (3)	475			A
T (3)	476			A
T (3)	477			D
T (3)	478			D
T (3)	479			D
T (3)	480			B
T (3)	481			D
T (3)	482			B
T (3)	483			A
T (3)	484			A
T (3)	485	•		
T (3)	486			D
T (3)	487			D
T (3)	488			D
T (3)	489			B
T (3)	490			D
T (3)	491			D
T (3)	492			D
T (3)	493			D
T (3)	494			A
T (3)	495			A

APPENDIX C WILSHIRE BOULEVARD THROUGH-TRAFFIC

TO: John Stutsman, Korve Engineering

CC: David Mieger, MTA

FROM: Viggen Davidian/Scott Carlson

DATE: January 28, 2002

SUBJECT: Wilshire Boulevard Through Traffic

J/P NUMBER: J01-036

Introduction

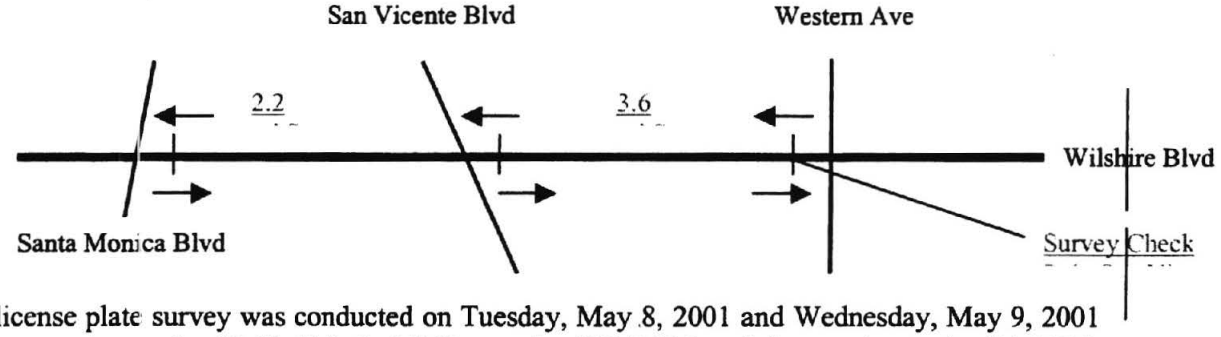
This memo documents the results of a comprehensive license plate survey conducted by Meyer, Mohaddes Associates (MMA) for the Wilshire Bus Rapid Transit (BRT) project. The purpose of the license plate survey was to identify the percentage of vehicles that make relatively longer distance trips along Wilshire Boulevard. The amount and percentage of long distance trips is of interest in light of some of the results from the MTA's Travel Demand Forecast Model, which suggest the diversion of long distance trips to parallel routes, when one lane of travel in each direction is dedicated to the proposed BRT. The firm of Wiltec assisted MMA in the collection of license plate data.

The license plate survey was conducted for both westbound and eastbound traveling vehicles at three locations along Wilshire Boulevard to determine the patterns and amount of long-distance travel on Wilshire Boulevard. The three survey locations were as follows, as illustrated in **Figure 1.**

- Wilshire Boulevard/West of Western Avenue
- Wilshire Boulevard/East of San Vicente Boulevard (Beverly Hills eastern city limits)
- Wilshire Boulevard/East of Santa Monica Boulevard.

The travel distance was measured as 5.8 miles between Western and Santa Monica, 2.2 miles between San Vicente and Santa Monica, and 3.6 miles between San Vicente and Santa Monica survey points.

Figure 1. Survey Check Points



The license plate survey was conducted on Tuesday, May 8, 2001 and Wednesday, May 9, 2001 for the morning peak of 8-10 AM, the Midday peak of 12-2 PM, and the evening peak of 4-6 PM.

During these three periods, license plate numbers were recorded for all vehicles traveling in both eastbound and westbound directions at the three locations. The plate numbers were recorded at 10-minute intervals.

Once the license plate data was collected and entered into a database, MMA conducted a thorough analysis of the data in order to determine the number and percentage of vehicles that traveled Wilshire Boulevard along each of the study segments. These study segments included Western to Santa Monica, as well as Western to San Vicente and Santa Monica to San Vicente. The analysis was done using a specially developed software program, which identifies the number of positively matched license plates from two (entry and exit) data sets, given certain parameters based on typical travel times between the entry and exit points. The results of the license plate survey analysis are discussed in the next section.

Observations

Table 1 shows the total number of license plates recorded at the beginning of the eastbound and westbound trip for the three time periods. In the eastbound direction, 2,074 vehicles were recorded at Wilshire east of Santa Monica during the morning peak, while 3,055 vehicles were recorded during the midday peak, and 2,746 vehicles were recorded during the evening peak. In the same direction, 2,120 vehicles were recorded at Wilshire east of San Vicente during the morning peak, while 2,389 vehicles were recorded during the midday peak, and 2,756 vehicles were recorded during the evening peak.

In the westbound direction, 2,249 vehicles were recorded at Wilshire west of Western during the morning peak, while 1,942 vehicles were recorded during the midday peak, and 2,252 vehicles were recorded during the evening peak. In the same direction, 2,570 vehicles were recorded at Wilshire east of San Vicente during the morning peak, while 2,315 vehicles were recorded during the midday peak, and 2,463 vehicles were recorded during the evening peak.

Table 1. Total Number of Recorded License Plates at Entry points

Entry Check Point	AM	Midday	PM
Westbound			
West of Western	2,249	1,942	2,252
East of San Vicente	2,570	2,315	2,463
Eastbound			
East of Santa Monica	2,074	3,055	2,746
East of San Vicente	2,120	2,389	2,756

The largest observed volume of travel for eastbound trips on Wilshire at Santa Monica occurred in the Midday period, and the lowest volume of travel occurred in the AM period. The largest volume of travel on Wilshire at San Vicente occurred in the PM period, and the lowest volume of travel also occurred in the AM period.

For westbound trips, the largest volume of travel on Wilshire west of Western was evenly matched between the AM and PM peaks. The largest volume of travel on Wilshire east of San Vicente occurred in the AM period, and the lowest volume of travel occurred in the Midday period.

Once the data was collected and recorded, MMA used the software TTMatch to match the license plate numbers. But in order to limit license plate matches to those vehicles that travel along Wilshire without stopping, a time constraint was used during the matching process. MMA conducted a travel time field survey to determine a reasonable range of travel times between the study segments (Santa Monica-San Vicente and Western-San Vicente) and the entire length (Santa Monica-Western in both directions). A 10-20 minute range for the smaller segments and a 20-30 minute range for the entire distance were considered appropriate, allowing for traffic congestion and normal stoppage at signals, while discounting travelers making stops along the way. This was done to exclude those cars that would actually make destination stops with a purpose along the corridor from the true through trips. The results of the matched vehicle plates are summarized in Table 2.

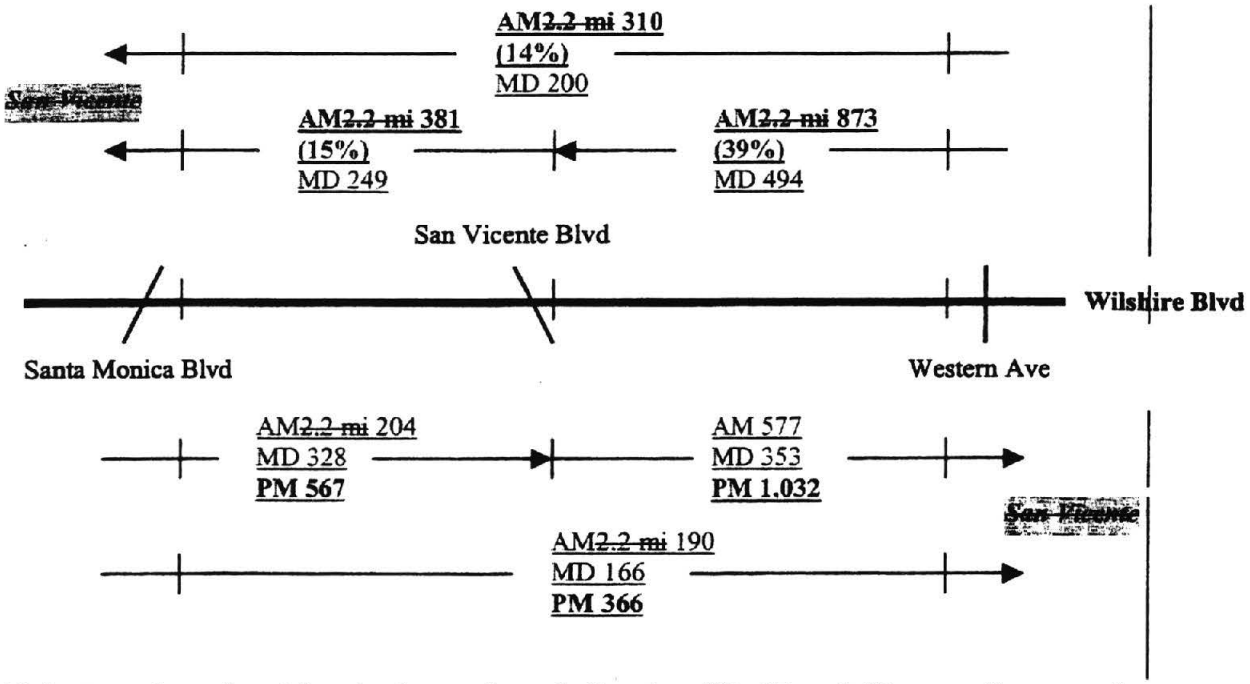
In the westbound direction in the AM peak, approximately 39 percent of the vehicles recorded west of Western continued east of San Vicente, approximately 15 percent of the vehicles east of San Vicente arrived east of Santa Monica, and approximately 14 percent of the vehicles west of Western arrived east of Santa Monica. In the Midday peak, the number of matches decreased to 25 percent between Western and San Vicente, to 11 percent between San Vicente and Santa Monica, and to 10 percent for the entire distance. In the PM peak, the number of matches decreased slightly to 23 percent between Western and San Vicente, 10 percent between San Vicente and Santa Monica, and 8 percent between Western and Santa Monica.

Table 2. Number and Percentage of Matched License Plates Between Check Points

Survey Check Points	AM		Midday		PM	
Westbound	#	%	#	%	#	%
West of Western to East of San Vicente	873	***39%***	494	*25%*	512	*23%*
East of San Vicente to East of Santa Monica	381	***15%***	249	*11%*	253	*10%*
West of Western to East of Santa Monica	310	***14%***	200	*10%*	173	*8%*
Eastbound	#	%	#	%	#	%
East of Santa Monica to East of San Vicente	204	*10%*	328	*11%*	567	***21%***
East of San Vicente to West of Western	577	*27%*	353	*15%*	1,032	***37%***
East of Santa Monica to West of Western	190	*9%*	166	*5%*	366	***13%***

In the eastbound direction in the AM peak, approximately 10 percent of the vehicles recorded west of Santa Monica continued east of San Vicente, approximately 27 percent of the vehicles east of San Vicente arrived west of Western, and approximately 9 percent of the vehicles west of Santa Monica arrived west of Western. In the Midday peak, the number of matched vehicles increased to about 11 percent between Santa Monica and San Vicente, while matches decreased to 15 between San Vicente and Western and to 5 percent for the entire distance. In the PM peak, the number of matches decreased to 21 percent between Santa Monica and San Vicente, 37 percent between San Vicente and Western, and 13 percent for the entire distance. Through traffic patterns for the Study Area are illustrated in Figure 2.

Figure 2. Peak Period Through Traffic Volumes on Wilshire Boulevard
(highest commute peak through volume and % is shown in boldface)



The highest number of matches in the eastbound direction (21, 37 and 13 percent) occurred during the PM peak, while the highest number of matches in the westbound direction (39, 15 and 14 percent) occurred during the AM peak.

Overall Conclusions

The results of this license plate survey indicate that there is a significant amount of long distance through travel on Wilshire Boulevard. During peak AM and PM peak commute hours, approximately 13 to 14 percent of the vehicles on Wilshire Boulevard travel the entire 5.8 mile segment between Western Avenue and Santa Monica Boulevard. During the mid-day, this percentage is lower, at about 5 to10 percent. For the two shorter study segments, intuitively, the through traffic percentages are higher than for the entire 5.8 miles. However, it is interesting to note that, through trips are significantly higher (typically twice as high) in the longer (3.6 mile) Western to San Vicente segment compared to the shorter (2.2 mile) San Vicente to Santa Monica segment. Through trips in the Western to San Vicente segment during the peak commute hours are as high as 37 and 39 percent in the peak direction. While through trips in the Santa Monica to San Vicente segment are only as high as 15 and 21 percent in the peak direction.

APPENDIX D MITIGATION MONITORING AND REPORTING PROGRAM AND CONSTRUCTION MITIGATION PLAN

Appendix D

Mid-City/Westside Transit Corridor Wilshire Bus Rapid Transit Project

Mitigation Monitoring and Reporting Program and Construction Mitigation Plan

Prepared by
Terry A. Hayes Associates LLC
6083 Bristol Parkway, Suite 200
Culver City, CA. 90230
and
Korve Engineering, Inc.
725 South Figueroa Street
Los Angeles, CA. 90017

Prepared for
Metropolitan Transportation Authority
One Gateway Plaza
Los Angeles, CA. 90012

July 2002

CONTENTS

D.1 Mitigation Monitoring and Reporting Program D.1-1

Introduction D.1-1

Definition of Acronyms D.1-1

Mitigation Monitoring Plan D.1-2

D.2 Construction Mitigation Plan D.2-1

Introduction D.2-1

I. Purpose and Need D.2-1

II. Description of Site and Extent of Work D.2-1

Construction Phasing and Staging Plans D.2-2

I. Construction Phasing and Staging Plans D.2-2

II. Construction Work Time Limitation D.2-4

III. Conduct of Permitted Utility Relocation Work D.2-4

IV. Coordination with Other Projects D.2-5

V. Accommodation of Special Events D.2-5

Traffic and Circulation D.2-6

I. Traffic Control in Construction Zone D.2-6

II. General Traffic Management D.2-8

III. Truck Movement D.2-8

IV. Haul Routes D.2-9

V. Parking D.2-10

VI. Pedestrian Access D.2-12

VII. Accessibility to Businesses D.2-14

Public Safety D.2-15

I. Temporary Signage D.2-15

II. Temporary Street Lighting D.2-16

III. Street and Sidewalk Maintenance D.2-17

IV. Site Maintenance D.2-18

Environmental Impacts D.2-20

I. Noise/Vibration Control and Monitoring D.2-20

II. Drainage and Erosion Control D.2-23

III. Air Quality D.2-25

IV. Hazardous Materials Discovery and Removal D.2-26

V. Archeological and Paleontological Resources D.2-27

Third Party Claims D.2-28

I. Claims Resolution Procedures D.2-28

D.1 MITIGATION MONITORING AND REPORTING PROGRAM

■ Introduction

The California Environmental Quality Act (CEQA) requires that agencies adopting environmental impact reports take affirmative steps to determine that approved mitigation measures are implemented subsequent to project approval. Specifically, the lead or responsible agency must adopt a reporting or monitoring program fro mitigation measures incorporated into a project or imposed as conditions of approval. The program must be designed to ensure compliance during project implementation (cal. Pub. Res. Code Section 21081.6).

This Mitigation Monitoring and Reporting Program (MMRP) will be used by the Los Angeles County Metropolitan Transportation Authority (MTA) staff responsible for ensuring compliance with mitigation measures associated with the Wilshire Bus Rapid Transit Corridor project.

The Final Environmental Impact Report for the proposed project identified mitigation measures to reduce the adverse effects of the project in the areas of traffic and circulation, parking, land acquisition/displacement and relocation, visual, geology, safety and security, and construction.

The following table identifies the adverse impacts and mitigation measures by resource area and by project phase. The table also identifies the specific mitigation monitoring and reporting requirements, including the party responsible for implementing the mitigation measure, the implementation phase, the monitoring activity, the monitoring period and frequency, the party responsible for monitoring the mitigation, and the outside agency coordination.

In addition, MTA will prepare quarterly mitigation monitoring status reports throughout the Design/Build phase.

■ Definition of Acronyms

BRT	Bus Rapid Transit
LADOT	City of Los Angeles Department of Transportation
LACMTA	Los Angeles County Metropolitan Transportation Authority
SCAQMD	South Coast Air Quality Management District

MITIGATION MONITORING PLAN
MID-CITY/WESTSIDE TRANSIT CORRIDOR WILSHIRE BUS RAPID TRANSIT PROJECT

Mitigation		Responsible Party	Implementation Phase	Monitoring Activity	Monitoring Period & Frequency	Enforcement Agency	Monitoring Agency
Traffic and Circulation							
MM 3.2-1	If the dedicated bus lane were to be implemented in the City of Los Angeles, the LACMTA would assist the City of Los Angeles Department of Transportation to implement the Advanced Traffic Control System (ATCS) in the Mid-City/Westside Study Area. A total of 433 signalized intersections in the following ATSAC project areas will be upgraded to the ATCS system: Mid-Wilshire, Wilshire-West, Westwood, West Los Angeles, and Santa Monica Freeway-Smart Corridor. Funding will be added to the project budget to finance the ATCS system in this area.	LACMTA; LADOT	Operation	Review signal timing	Upon commencement of operation and as needed thereafter	LADOT	LADOT
MM 3.2-2	If the dedicated bus lane were to be implemented in the City of Beverly Hills, the LACMTA would coordinate with the City of Beverly Hills to identify traffic operations improvements, similar to the ATCS system in Los Angeles, to mitigate the impacts of any diversion of traffic from Wilshire Boulevard to alternate arterial streets. Streets, which could be candidates for signal system upgrade, include Olympic Boulevard, North and South Santa Monica Boulevards and Burton Way, with about 23 traffic signals.	LACMTA; City of Beverly Hills	Operation	Review signal timing	Upon commencement of operation and as needed thereafter	City of Beverly Hills	City of Beverly Hills
MM 3.2-3	If the transit lane were implemented, operational and/or geometric improvements would be implemented to reduce the impacts of the Wilshire BRT: Hauser Boulevard/Sixth Street - Restripe northbound approach to a left turn lane and a shared through-right turn lane; Recalibrate signal timing.	LACMTA and/or Design/Build Contractor	Construction	Review Design/Build Drawings; Review signal timing	At Design/Build Submittal Milestones; Upon commencement of operation and as needed thereafter	LADOT	LADOT

MITIGATION MONITORING PLAN
MID-CITY/WESTSIDE TRANSIT CORRIDOR WILSHIRE BUS RAPID TRANSIT PROJECT

	Mitigation	*Responsible Party*	*Implementation Phase*	*Monitoring Activity*	*Monitoring Period & Frequency*	*Enforcement Agency*	*Monitoring Agency*
MM 3.2-4	If the transit lane were implemented, the following signals would be retimed to reduce delay: Wilshire Boulevard/Federal Avenue/San Vicente Boulevard; Sepulveda Boulevard/Wilshire Boulevard; Gayley Avenue/Wilshire Boulevard; Westwood Boulevard/Santa Monica Boulevard; Glendon Avenue/Wilshire Boulevard; Whittier Drive/Wilshire Boulevard; South Santa Monica Boulevard/Wilshire Boulevard; Spalding Drive/Olympic Boulevard. The following intersections have significantly unavoidable impacts since feasible intersections have significantly unavoidable impacts since feasible operational measures considered at these intersections would not mitigate all identified impacts: Westwood Boulevard/Wilshire Boulevard and La Cienega Boulevard/Wilshire Boulevard.	LACMTA; LADOT; City of Beverly Hills	Operation	Review signal timing	Upon commencement of operation and as needed thereafter	LADOT; City of Beverly Hills	LADOT; City of Beverly Hills
MM 3.2-5	If the transit lane were implemented, funding shall be provided for LADOT and City staff in the City of Beverly Hills to monitor traffic conditions on residential streets adjacent to the Wilshire BRT to determine if the project results in adverse impacts on residential streets. They shall prepare traffic mitigation programs for each impacted neighborhood in coordination with the affected residents. LACMTA shall include in the project budget funds to reimburse the local jurisdictions for the cost of such monitoring, outreach, and implementation for neighborhood traffic management programs.	LACMTA; LADOT; City of Beverly Hills	Operation	Review traffic management programs for each impacted neighborhood	Upon commencement of operation and as needed thereafter	LADOT; City of Beverly Hills	LADOT; City of Beverly Hills

MITIGATION MONITORING PLAN
MID-CITY/WESTSIDE TRANSIT CORRIDOR WILSHIRE BUS RAPID TRANSIT PROJECT

Mitigation		Responsible Party	Implementation Phase	Monitoring Activity	Monitoring Period & Frequency	Enforcement Agency	Monitoring Agency
Parking							
MM 3.3-1	The LACMTA shall contribute $90,000 to the City of Santa Monica Parking Fund, which the City utilizes to provide parking in consolidated parking facilities, to offset the loss of nine on-street parking spaces.	LACMTA; City of Santa Monica	Before and During Operation	Check for contribution to the City of Santa Monica Parking Fund	Upon commencement of operation	LACMTA	City of Santa Monica
Land Acquisition/Displacement and Relocation							
MM 3.4-1	Relocation assistance shall be provided to displaced properties per LACMTA policies and procedures.	LACMTA	Acquisition	Review Relocation Plan	Once, at acquisition	LACMTA	LACMTA
Visual							
MM 3.5-1	All lighting in parking facilities shall utilize Best Available Technology to reduce spillover to adjacent land uses. In addition, all lighting in parking lots shall be directed away from adjacent residences, landscaping, or fences, and other measures shall be provided to shield adjacent residences from light and glare produced by light standards and vehicle headlights.	LACMTA and/or Design/Build Contractor	Construction	Review Design/Build plans for lighting	At Design/Build Submittal Milestones; Upon commencement of operation	LACMTA	LACMTA
MM 3.5-2	Screening shall be provided at parking facilities to reduce potential privacy impacts on adjacent residential properties.	LACMTA and/or Design/Build Contractor	Design/Build	Review Design/Build plans for lighting	At Design/Build Submittal Milestones	LACMTA	LACMTA
Geology							
MM 3.6-1	Prior to the final approval of the maintenance yard site, a geotechnical study shall be prepared by a Registered Geologist indicating the design requirements for the site. Identified requirements shall be incorporated into the specifications for the maintenance yard project.	LACMTA and/or Design/Build Contractor	Design/Build	Review Design/Build drawings; Review detailed geotechnical investigation	At Design/Build Submittal Milestones	LACMTA	LACMTA

MITIGATION MONITORING PLAN
MID-CITY/WESTSIDE TRANSIT CORRIDOR WILSHIRE BUS RAPID TRANSIT PROJECT

Mitigation		Responsible Party	Implementation Phase	Monitoring Activity	Monitoring Period & Frequency	Enforcement Agency	Monitoring Agency
Safety and Security							
MM 3.7-1	If the peak period transit lane were implemented with a right turn priority phase, subject to local permit approval, new signage shall be installed at signalized pedestrian crossings where the right turn movement for motorists is protected, advising pedestrians to wait for the "walk" signal.	LACMTA	Construction	Review Design/Build drawings	At Design/Build Submittal Milestones	LACMTA	LACMTA
MM 3.7-2	All station areas shall be lighted to provide a safe environment and visibility of the station area from adjacent uses.	LACMTA and/or Design/Build Contractor	Construction	Review Design/Build drawings	At Design/Build Submittal Milestones	LACMTA	LACMTA
MM 3.7-3	If a peak period transit lane is implemented, the LACMTA shall sponsor a pedestrian safety education program, explaining acceptable methods to cross those intersections using BRT signal prioritization.	LACMTA	Operation	Review pedestrian safety education program	Upon commencement of operation and as needed thereafter	LACMTA	LACMTA
Construction Impacts							
	The LACMTA shall implement and enforce the Wilshire Boulevard BRT Construction Mitigation plan to reduce construction related impacts generated by the reconstruction and repair of the curb lane between Western Avenue and San Vicente Boulevard.	LACMTA; Design/Build Contractor	Construction	Review of Plans and Inspection; Review Design/Build contract terms; consultation with school officials	At Design/Build submittal Milestones; Review before Construction; Monitor construction weekly to monthly; establish monthly meetings with LAUSD officials	LACMTA; LADOT; LAUSD; SCAQMD	LACMTA; LADOT; LAUSD; SCAQMD

D.2 CONSTRUCTION MITIGATION PLAN

■ Introduction

I. Purpose and Need

The Construction Mitigation Plan has been developed based on the following overall project goals:

1) To create a construction and management process that is efficient and responsive.
2) To minimize impacts and to prevent compromise of the viability of local businesses and the community.

The purpose of the Construction Mitigation Plan is to define a set of policies for construction of the Mid-City/Westside Transit Corridor Wilshire Bus Rapid Transit Project (Project). These policies cover a broad range of topics, including phasing and staging of the work, public safety issues, environmental impacts, public information and community relations.

The policies contained in the Construction Mitigation Plan will be reviewed by project participants as part of the final review process for construction documents. Following the review, City staff and consultants will be responsible for articulating the Plan into specific contract language that will be made part of the construction contract documents.

II. Description of Site and Extent of Work

The project consists of three main components: Wilshire Bus Rapid Transit (Wilshire BRT), Bus Maintenance Facility, and Parking Facilities at La Brea and Crenshaw.

A. Wilshire Boulevard BRT

Major work, such as repair and reconstruction of travel lanes and intersections on Wilshire Boulevard (between Western Avenue and San Vicente Boulevard), will take place within the City of Los Angeles. Installation of bus pads at station locations, construction of station shelters, and station landscaping, installation of additional infrastructure for elements such as communications and signaling will take place along the entire Wilshire BRT route (from Western to Ocean Avenues).

The majority of the construction activities will occur along Wilshire Boulevard between Western Avenue and San Vicente Boulevard since it is within this area where repair and reconstruction of travel lanes will occur. Reconstruction and repair of travel lanes will not occur outside of this area (from San Vicente Boulevard to Ocean Avenue) since the curb lanes in these areas are already in good repair. The curb lane on Wilshire Boulevard between Western Avenue and San Vicente Boulevard will be repaired and reconstructed such that, during project operations, buses can travel on a more leveled and smoother surface. Reconstruction of travel lanes will occur at intersections and at mid-blocks between the intersections.

B. Bus Maintenance Facility

The proposed project consists of expanding the existing Division 10 bus maintenance facility, which is located at 742 North Mission Road in the City of Los Angeles east of Downtown near the intersection of the Golden State (I-5) and San Bernardino (I-10) Freeways. The existing site extends from the Burlington Northern Santa Fe (BNSF) railroad tracks to the Santa Ana Freeway (I-5) right-of-way. The existing site is approximately 20.2 acres. The proposed project will expand the existing site to approximately 28.8 acres. The site will be expanded to the west through the addition of the parcels that are currently used for auto-related repair and salvage businesses. A triangular-shaped area south of the BNSF tracks, which is bounded by Mission Road, BNSF railroad tracks, San Bernardino Freeway, and Gallardo Street, will also be part of the expanded site.

C. Parking Facilities

Existing parking facilities will be upgraded in two locations along the Wilshire BRT alignment: at the Wilshire Boulevard/La Brea Avenue and Wilshire Boulevard/Crenshaw Boulevard intersections.

Construction Phasing and Staging Plans

I. Construction Phasing and Staging Plans

Description: The Construction Phasing and Staging Plan limits the impact of construction in any segment through limitations on the areas that may be constructed at a particular time. The goal of the construction phasing plan is to maximize public convenience, while providing as much efficiency as possible to the construction such that the project work is expedited for the earliest completion. These two aspects of the goal act counter to each other in some ways, but the plan outlined here includes the best compromises to achieve the optimum result.

A. Wilshire Boulevard BRT

Major Project Segments

Although the project stretches along Wilshire Boulevard from Wilshire/Western to Wilshire/Ocean, reconstruction will take place in three segments, Wilshire Center, Park Mile, and Miracle Mile in the City of Los Angeles. The reconstruction of these three segments will take place along Wilshire from Wilshire/Western to Wilshire/San Vicente, the City of Beverly Hills easterly limit.

Principal Phasing

The project in anticipated to be constructed in three phases with three to four block segments being reconstructed simultaneously during each phase. Each phase would typically last approximately 16 weeks for a total of 48 weeks.

Construction Staging

Each segment will be divided into work areas (stages), such that traffic, parking and sidewalks can be maintained in other areas during construction. Within each stage there is a sequence of actions that occur to complete the

construction in that stage. Following completion of the sequence of actions in one stage, the traffic circulation pattern will be shifted to allow for commencing the next stage.

Intersection Construction

Staging at the intersections requiring reconstruction may occur in the following steps:

1. Stage 1 would close of the curb lanes at all at all four street corners. Two travel lanes and a left turn pocket for each direction will be maintained on Wilshire. One travel lane in each direction will be maintained on the cross street.
2. Stage 2 will close of the EB curb lane and the entire south leg. This closure will prohibit WB left and EB right turning movements
3. Stage 3 will close of two EB travel lanes. One of the travel lanes will be detoured around the closure by utilizing the left turn pocket for through movements. This closure will prohibit N and S through traffic and WB left turn movements.
4. Stage 4 will close of the two center lanes on Wilshire. Two WB through lanes and three EB through lanes will be maintained. This closure will prohibit N and S through traffic and WB left turn movements.
5. Stage 5 will close of the No. 2 lane and the two center lanes of the north leg. This will prohibit N and S through traffic and EB left turn movements.

Mid-block Construction

Mid-Block construction will occur following the intersection construction. This will occur on one side of Wilshire at a time in three to four block segments. Mid-block construction may require the closure of the curb lane and No. 2 lane on the construction side of the street.

B. Bus Maintenance Facility

Construction of the proposed bus maintenance facility consists of constructing a new maintenance building, a new tire shop, a new transportation building, new fueling lanes/CNG farm, and a new fare retrieval area. A deck bridge will span the railroad tracks and provide access to the two parts of the proposed site. The existing tire shop will be relocated to an area under the San Bernardino Freeway structure. Approximately 41,000 cubic yards of soil will be excavated on the site. Construction will last for approximately two years.

C. Parking Facilities

Construction of the two parking facilities will involve paving and striping of the parking area; reconstructing concrete curbs, driveways, and sidewalks as necessary; and landscaping.

Equipment used for construction of the parking facilities will include diamond saws, pavement breakers, jackhammers, compressors, concrete pumping equipment, paving machines, dump trucks, and front-end loaders.

II. Construction Work Time Limitation

Description: Limitations are necessary on construction work hours to mitigate noise, traffic, and various other impacts on the community at certain times.

Polices:

1. Hours of work shall be limited to 8:00 A.M. to 4:00 P.M. except in special circumstances when compromising to expedite completion is in the best interests of the community.

2. Special events will be accommodated by limiting work between Thanksgiving Day and New Years Day.

III. Conduct of Permitted Utility Relocation Work

Description: Prior to construction work, public and private utility companies will be adjusting and relocating their facilities. There is also a possibility of utility relocation work during construction due to unforeseeable circumstances. This work in the public right-of-way should be conducted in accordance with the same standards of traffic control applicable.

Polices:

1. *Utility Relocation Work.* The City of Los Angeles will issue permits to allow utility relocation work to proceed in advance of work by the contractor. The work will be subject to customary City permit requirements relative to traffic control, noise and work hours. Moratorium requirements will be enforced, with utility companies notified of the moratorium restrictions, during the design phase of the project. Notification that relocations during construction will require late night work with flagmen will be included.

A. Wilshire BRT

Implementation Measures:

1.1 Ensure that any known utility disruptions are effectively articulated to affected businesses and residential community in a timely manner, so as to minimize impacts and inconveniences.

1.2 Provisions for the clean-up of non-conforming paving and utility work by City, or a separate contractor, and back-charging of expenses to the responsible utility company/agency.

1.3 Any underground tanks (USTs) or contaminated soil encountered by utility companies/agencies will be their responsibility to address.

B. Bus Maintenance Facility

See Implementation Measures 1.1 through 1.3, above.

C. Parking Facilities

See Implementation Measures 1.1 through 1.3, above.

IV. Coordination with Other Projects

Description: Defines the relationship between the Contractor and work by others that will be occurring concurrently with the Contractor inside the project limits and directly adjacent to the project limits. This is important relative to any interference and/or delay claim by the Contractor. There are no significant projects of this type identified, but general policies will be followed.

Polices:

1. *Private Utility Work.* The contract will define the work to the extent possible (scope and time), that private utilities will be performing during the life of the contract and require the Contractor to accommodate the work and carry it in his schedule.

2. *Other Projects.* The contract will define the work (scope and time) that other known projects will be performing during the life of the contract and require the Contractor to accommodate the work and carry it in his schedule.

3. *Unforeseen Work.* To cover unforeseeable work by others, contract provisions will be included in order to provide for the contract to accommodate the work.

V. Accommodation of Special Events

Description: The contractor will be required to postpone or reschedule construction activities or otherwise accommodate special events within the project limits during the construction period. Excavated areas shall be resurfaced as appropriate for the event.

Polices:

1. *Construction Moratorium during Special Events.* The City shall designate all special events that shall cause construction to cease in order to accommodate said special event.

A. Wilshire BRT

Implementation Measures:

1.1 The contract will list known special events and activities that will need to be accommodated during contract work.

1.2 Excavations on public streets shall be backfilled and paved by the Contractor in order to accommodate these events and equipment and materials shall be removed from the affected areas of the event.

1.3 Specific time frames with liquidated damages and sufficient excess time for buffers will be established in the contract to the extent practical, for control of site conditions at time of the special event.

B. Bus Maintenance Facility

See Implementation Measures 1.1, 1.2, and 1.3, above.

C. Parking Facilities

See Implementation Measures 1.1, 1.2, and 1.3, above.

Traffic and Circulation

I. Traffic Control in Construction Zone

Description: The principles and standards set forth in the section are intended to direct the safe and expeditious movements of vehicular and pedestrian traffic through the zone of construction for the Project. The Contractor will be obligated to abide by detailed plans and specifications, as well as all local laws and ordinances in order to manage all public vehicular traffic passing through the work zone, as well as provide for pedestrian access to businesses and residents alike.

It is anticipated that the construction work will reduce capacity of and cause delays. These impacts can be mitigated and minimized by careful planning in advance of the construction activities. A specific traffic control plan will be developed. The plan will include a staging strategy for construction describing a step-by-step process to get from existing conditions to the final alignment and development of the Project.

Policies:

1. *Maintenance of Temporary Traffic Control and Through Traffic Operation by the Contractor.* Effective traffic control shall be provided by the Contractor and Subcontractors at all times in order to provide for the safe and efficient crossing/movement of pedestrians/bicyclists, and effective movements of automobiles, buses and truck traffic.

A. Wilshire BRT

Implementation Measures:

1.1 During each stage of construction, the Contractor shall maintain proper access to all properties in the vicinity of the construction area for emergency vehicles.

1.2 The duration of temporary street lane closures will be limited by contract documents. Signs will be posted indicating closure times and alternate routes in advance of allowed closure.

1.3 The Contract will provide for installing, and maintaining a system of temporary traffic signals at selected intersections that are currently controlled by traffic signals. The design of the temporary system will be subject to approval and coordinated with the City of Los Angeles.

1.4 Temporary traffic signals and pedestrian signage will be mounted by the Contractor on temporary poles and/or span wires in locations that are appropriate and safe given the nature and character of the work under way in a given intersection, e.g., pedestrian signals will be mounted directly opposite the crosswalk they control.

1.5 Construction vehicles will be queued/stored as to affect the traffic operation through the construction area beyond what is permitted in the specifications and on the plan sheets. Generally, this will be limited to the time it takes to slow and exit the traffic circulation pattern.

1.6 The temporary signing, striping, and markings shall be kept in good condition and maintained by the Contractor as shown on the plan sheets so as not to further impact traffic movement.

1.7 The Contractor shall ensure that construction related activities will minimize impacts to the flow of through traffic.

1.8 The MTA and the Contractor will develop preferred haul route plans. The truck haul route plan will distribute the trucks over more than one arterial street to/from the freeways, but avoid the use of residential streets or streets near schools.

1.9 The MTA will coordinate with other major construction projects withing a one-mile radius of the construction site to avoid, to the maximum extent practicable, overlapping haul routes with other public or private construction projects.

1.10 Traffic control procedures shall be used including flagmen, cones and flashing lights, where appropriate.

B. Bus Maintenance Facility

See Implementation Measures 1.1 through 1.10, above.

C. Parking Facilities

See Implementation Measures 1.1 through 1.10, above.

II. General Traffic Management

Description: Construction for the Project is expected to create congestion and delays during the construction phase. Effective measures of transportation system management are critical in order to ensure that adverse impacts are mitigated effectively.

Policies:

1. *Transportation System Management (TSM) Tools.* Utilize effective TSM program along with related tools/measures to manage and mitigate traffic along Wilshire.

A. Wilshire Boulevard BRT

Implementation Measures:

1.1 Establish a well-organized program to encourage through-traffic on Wilshire to disperse to adjacent parallel arterials. Utilize the grid street system on the north and south sides of the project to divert traffic so as to reduce congestion/delays.

1.2 Institute changeable message signs on Wilshire at the Project limits redirecting through traffic to adjacent parallel streets.

1.3 Implement signal timing synchronization along Wilshire to improve efficient traffic flow.

1.4 Prohibit or discourage left-turn movement along Wilshire during the morning and afternoon peak periods.

1.5 Provide for left-turn movement at present left turn pockets and at protected left-turn signalized intersections.

B. Bus Maintenance Facility

Implementation measures not required.

C. Parking Facilities

Implementation measures not required.

III. Truck Movement

Description: A great deal of truck deliveries occurs along Wilshire currently either utilizing driveways on Wilshire or through the rear of businesses using the alleys. This function is indispensable for the business owners and will have to be maintained to the greatest extent possible.

Policies:

1. *Accommodate local truck traffic and deliveries.* Accommodate truck traffic and truck deliveries to businesses to greatest extent possible and feasible.

Implementation Measures:

1.1 The MTA and the contractor will develop preferred haul route plans for the removal of excavated material. The haul route plans shall prohibit the use of local residential streets, and avoid utilizing streets on which schools are located. The truck haul route plan will distribute the trucks over more than one arterial street route to/from the freeways, but avoid the use of any local residential streets.

A. Wilshire Boulevard BRT

Implementation Measures:

1.1 Provide continuous coordination for merchants truck delivery needs to allow access across construction areas and temporary K barriers. Maintain continued access with a driveable surface across construction areas whenever possible at such locations. ,

1.2 Encourage truck deliveries from alley side in the back of business establishments, where appropriate.

1.3 Consolidate driveways and delivery access temporarily for business accessing from Wilshire.

1.4 Discourage through-traffic truck movement along Wilshire with appropriate detour signage.

B. Bus Maintenance Facility

Implementation measures not required.

C. Parking Facilities

Implementation measures not required.

IV. Haul Routes

Description: Earthwork and grading will require the movement of earth to/from the construction sites

Policies: 1. Use haul routes that avoid sensitive land uses.

A. Wilshire BRT

Implementation Measures:

1.1 The MTA and the Contractor shall develop preferred haul route plans for the removal of excavated material. The haul route plans shall prohibit the use of local residential streets and avoid utilizing streets on which schools are located. The truck haul route plan will

distribute the trucks over more than one arterial street route to/from the freeways, but avoid the use of any residential streets.

B. Bus Maintenance Facility

See Implementation Measure 1.1, above.

C. Parking Facilities

See Implementation Measure 1.1, above.

V. Parking

Description: Parking within the construction project area is limited during construction working hours on some stages of the work. Efforts to mitigate this condition should be pursued to the maximum extent possible.

Policies: 1. General Parking Conditions

A. Wilshire Boulevard BRT

Implementation Measures:

1.1 Maintain as much on-street parking as possible during the construction phase.

1.2 Maintain operation of on-street parking meters, if possible, to encourage turn over of parking spaces serving commercial areas.

1.3 Identify street segments within a 1-block radius of Wilshire where permit parking restrictions could be temporarily modified during specific hours (especially daytime hours) to offset some of the on-street parking lost during stages of construction.

1.4 In areas of construction, temporary signage will be used to direct patrons to back of business parking, where appropriate.

B. Bus Maintenance Facility

Implementation measures not required.

C. Parking Facilities

Implementation measures not required.

Policies: 2. Contractor/Subcontractor Parking Restrictions

Implementation Measures:

2.1 Parking for Contractor and subcontractor employees needs to be restricted and minimized, in order to retain as much on-street parking as possible for use by local businesses, their customer base and local residents.

2.2 The construction contract shall define a remote area for Contractor parking outside the immediate construction vicinity, with shuttle to site, if necessary.

Policies: 3. *Restriction of Contractor/Subcontractor Parking.* The Construction Manager will work with the Contractor to establish a policy for the actual number of essential vehicles, including specific trade supply trucks, allowed to park in on-street spaces adjacent to the project site.

A. Wilshire Boulevard BRT

Implementation Measures:

3.1 The construction contract shall define a remote area for Contractor parking outside the immediate construction vicinity.

3.2 Define the Contractor's essential vehicles and issue dash board identification cards to authorize only a select number of vehicles to park on streets within the construction area.

B. Bus Maintenance Facility

Implementation measures not required.

C. Parking Facilities

Implementation measures not required.

Polices: 4. General Parking/Loading Limitations

A. Wilshire Boulevard BRT

Implementation Measures:

4.1 Maintain access to loading zones at all times unless construction work necessitates temporary closure. If temporary closure is necessary, provide alternate loading zone that meets the needs of the loading user. If needs cannot be met, conduct work during times that the loading zone is not in use.

4.2 Use meter hoods for temporary parking removal. Keep temporary parking removal duration to the minimum amount of time necessary to conduct the work.

B. Bus Maintenance Facility

Implementation measures not required.

C. Parking Facilities

Implementation measures not required.

Policies: 5. Valet Parking

A. Wilshire Boulevard BRT

Implementation Measures:

5.1 Where there is curbside valet parking the Contractor shall establish appropriate areas of access for passenger vehicles and pedestrians accessing the facility served by the valet services.

B. Bus Maintenance Facility

Implementation measures not required.

C. Parking Facilities

Implementation measures not required.

VI. Pedestrian Access

Policies: 1. *Pedestrian Protection.* The Contractor shall provide the necessary measures to ensure the safe and efficient movement of pedestrians.

A. Wilshire Boulevard BRT

Implementation Measures:

1.1 Maintain a minimum of two (2) crosswalks at selected signalized intersection at all times. Use appropriate signage as determined during plan review.

1.2 Maintain the 4-foot-wide sidewalk directly adjacent to buildings and property line, until the final item of construction in each stage. Allow for 4-foot hard walking surface at all times of construction, except when actual work is being performed.

1.3 Prohibit pedestrians from crossing across active construction zones. Install special pedestrian protection, e.g., barricades, fencing, as appropriate.

1.4 All pedestrian ways will be maintained in a clean and safe condition at all times.

1.5 Provide for safe and identifiable pedestrian walkways and crosswalks. Use chain-ink fence when required by the City during plan review.

1.6 Utilize special signage to direct pedestrians safely around work areas and into buildings.

1.7 Special crossings will need to be shown on the plans for Contractor to construct across construction areas to supplement the selected intersections with pedestrian crossings.

1.8 Maintain temporary ramps on street corners accommodate disabled access to the 4-foot-wide temporary walking surfaces while portions of sidewalk area under construction.

B. Bus Maintenance Facility

See Implementation Measures 1.2 through 1.8, above.

C. Parking Facilities

See Implementation Measures 1.2 through 1.8, above.

Policies: 2. Bus Stop Access.

A. Wilshire Boulevard BRT

Implementation Measures:

2.1 The plans will provide for Contractor to set up safe, accessible bus stops at selected locations, including selected BRT stations. The number of bus stops may be reduced however.

2.2 Sites for temporary bus stops, which are high volume passenger transfer locations, shall accommodate space for passenger waiting.

B. Bus Maintenance Facility

See Implementation Measures 2.1 and 2.2, above.

C. Parking Facilities

See Implementation Measures 2.1 and 2.2, above.

Policies: 3. Student Safety

A. Wilshire Boulevard BRT

Implementation Measures:

3.1 The construction contract shall stipulate that haul truck staging areas and routes shall avoid schools and school walk routes.

3.2 Construction which occurs within 500 feet of a school shall require coordination between the MTA and Los Angeles Unified School District to provide students with the safest means of vehicular/pedestrian travel feasible which includes alternate walk routes, where appropriate.

3.3 At crossings where bus transit cannot avoid student travel, crossing guards shall be provided during the times of bus operation to ensure public safety.

3.4 Prior to construction, a Pedestrian Safety Education Program shall be created explaining acceptable methods to cross guideway lanes.

3.5 The construction contract shall prohibit the staging or parking of construction vehicles, including vehicles that transport workers, on streets other than Wilshire Boulevard adjacent to the affected school sites.

B. Bus Maintenance Facility

See Implementation Measures 3.1 through 3.5, above.

C. Parking Facilities

See Implementation Measures 3.1 through 3.5, above.

VII. Accessibility to Businesses

Description: Business access and driveway access along Wilshire needs to be maintained during the construction phase, due to the parking availability within the private site.

Policies: 1. *Driveway Accessibility.* Driveway access should be maintained to the maximum extent possible.

A. Wilshire Boulevard BRT

Implementation Measures:

1.1 Identify all parking lots fronting construction with access only from Wilshire and provide for one access to be maintained at all times except during actual construction at that specific location.

1.2 In areas of construction, temporary signage will be used to direct patrons to back of house parking where appropriate.

1.3 Provide in the contract the requirement that immediately after excavation that would cut off access to a parking lot, access will be reestablished with a section of aggregate base. Such access shall be maintained until permanent surfacing is provided, and be profiled in a way that allows cross traffic of construction vehicles and equipment.

1.4 For identified drive accesses which are essential to be maintained, steel plating will be required to protect concrete during the curing process along with special concrete mixes that will accelerate curing.

B. Bus Maintenance Facility

Implementation measures not required.

C. Parking Facilities

Implementation measures not required.

■ Public Safety

I. Temporary Signage

Description: Temporary special signs are used to mitigate the effects of construction on businesses by informing customers that merchants and other businesses are open and to provide special access directions if warranted. Temporary special signage does not include "black or orange" traffic control signs used during construction for lane designations, speed control, etc.

Policies: 1. Temporary Special Signage

A. Wilshire Boulevard BRT

Implementation Measures:

1.1 All residences and businesses located within 800 feet of construction site shall be sent a notice regarding the construction schedule of the proposed project. A sign, legible at a distance of 50 feet shall be posted at the construction site. The sign shall indicate the dates and duration of construction activities, as well as provide a telephone number where residences and businesses can inquire about the construction process and register complaints.

1.2 In addition to traffic control signage required by the Maintenance or Traffic Plan, the project will employ a special signage program to assist merchants and area businesses with

special messages and access directions for their customers and clients during construction. The signs will carry custom messages that are agreed upon between community relations personnel and area businesses.

1.3 Background paint on the signs will be exterior enamel paint. Sign messages will be exterior enamel paint. Colors for background and sign messages, including letter size and style, to be as specified in the Contract.

1.4 Fabrication, installation, maintenance, and removal of the signs will be made a requirement of the construction contract.

B. Bus Maintenance Facility

Implementation measures not required.

C. Parking Facilities

Implementation measures not required.

II. Temporary Street Lighting

Description: Planned construction activities may necessitate removal and replacement of existing street lighting facilities. The project area must be lighted satisfactorily during the time the existing street lights are removed and the time that the permanent street lights are operational in order to provide for safety and security of pedestrians and allow motor vehicles to pass safely through the work zone.

Policies:

1. *Temporary Street Lighting.* To the greatest extent feasible, existing streetlights will not be removed from service. Temporary removal and replacement of street lighting shall be done in a manner that will provide for the safety and security of pedestrian and motorist throughout the construction zone.

A. Wilshire BRT

Implementation Measures:

1.1 Temporary street lighting will be installed to the City limits on all public streets on which existing permanent street lighting is removed for construction purposes.

1.2 Existing street lighting cannot be disconnected until all required, temporary street lights are installed and properly functioning.

1.3 Temporary street lighting cannot be disconnected until new permanent street lights are installed and properly functioning.

1.4 The Construction Manager shall determine when the temporary streetlights are completed and constructed in accordance with the Contract Documents.

1.5 The Contractor shall maintain temporary street lighting; pay for the cost of power; and pay the cost of power for the new street lighting system until substantial completion of the project.

B. Bus Maintenance Facility

See Implementation Measures 1.1 through 1.5, above.

C. Parking Facilities

See Implementation Measures 1.1 through 1.5, above.

III. Street and Sidewalk Maintenance

Description: The City of Los Angeles normal street and side walk maintenance activities will not be performed within the project limits where the Contractor has taken possession for construction staging purposes. The Contractor's operations will impact the condition of streets within and surrounding the work sites beyond what occurs in a normal day. As such, the responsibility for this maintenance becomes transferred to the Contractor.

Policies:

1. *Routine Street Cleaning/Maintenance Responsibility.* The City shall suspend its routine street cleaning and maintenance responsibilities during construction on affected areas. The construction contractor shall be responsible for these functions in the construction site area in accordance to these implementation measures.

A. Wilshire BRT

Implementation Measures:

1.1 The Contractor shall keep all streets and permanent and temporary pedestrian ways within the limits of any work begun or underway clean and free of all trash and construction debris on a daily basis or as directed by the Construction Manager until substantial completion of the work.

1.2 The construction Contractor will be required to properly clean all construction equipment before leaving the construction site to prevent tracking debris onto the public right-of-way.

1.3 The City will employ the "owner's right to work" clause in the contract and clean up construction debris if the Contractor fails to do the cleaning in a timely manner. The cost of such clean-up by the City will be back-charged to the Contractor.

1.4 The Contractor will maintain traffic control devices.

1.5 The plans will provide for the contractor to establish temporary locations for placement of street-side trash receptacles to serve pedestrians while portions of a sidewalk area are under construction.

B. Bus Maintenance Facility

See Implementation Measures 1.1 through 1.5, above.

C. Parking Facilities

See Implementation Measures 1.1 through 1.5, above.

IV. Site Maintenance

Description: In order to assure that the project site is maintained in a safe, clean, and passable condition throughout construction, the Contractor will be required to maintain the construction site in accordance with specific program/schedule defined in contract.

Policies: 1. *Designee Assigned to Site Maintenance.* The Contractor will be required to designate personnel or subcontractor to perform routine and special site maintenance activities so as to maintain a clean, passable and safe condition throughout the construction period.

A. Wilshire BRT

Implementation Measures:

1.1 The contract will carry a general site maintenance requirement and additional site maintenance requirements to be completed on an "as requested" basis.

B. Bus Maintenance Facility

See Implementation Measures 1.1, above.

C. Parking Facilities

See Implementation Measures 1.1, above.

Policies: 2. Routine Site Maintenance Requirements

A. Wilshire BRT

Implementation Measures:

2.1 The Contractor shall install, replace, and remove temporary protection and direction measures for vehicular and pedestrian traffic. Prompt removal of construction dirt and debris.

2.2 The Contractor shall install, replace, move, and remove project and merchant signs.

2.3 The Contractor shall pick up litter and trash generated by the contractor's operations.

2.4 The Contractor shall straighten and secure construction fencing barricades, and bridges and remove dirt, debris and litter, and sweep or hose pedestrian surfaces.

B. Bus Maintenance Facility

See Implementation Measures 2.1 through 2.4, above.

C. Parking Facilities

See Implementation Measures 2.1 through 2.4, above.

Policies: 3. Special Site Maintenance Requirements

A. Wilshire BRT

Implementation Measures:

3.1 The Contractor shall clean storefront glass and building faces of dust and dirt where appropriate.

3.2 Site maintenance activities that are not clearly defined as routine site maintenance in the contract will be considered special site maintenance.

B. Bus Maintenance Facility

See Implementation Measures 3.1 and 3.2, above.

C. Parking Facilities

See Implementation Measures 3.1 and 3.2, above.

Policies: 4. Cleaning Requirements for Construction Traffic

A. Wilshire BRT

Implementation Measures:

4.1 Trucks leaving the construction site shall be washed or driven over a gravel construction entrance to minimize tracking of material onto streets, if possible. This will be established in the erosion control plan. The Contractor shall follow SCAQMD Pollution Rule 403.

B. Bus Maintenance Facility

See Implementation Measures 4.1, above.

C. Parking Facilities

See Implementation Measures 4.1, above.

Environmental Impacts

I. Noise/Vibration Control and Monitoring

Description: Construction activities adjacent to commercial and residential property may produce noise and vibration that may be disruptive. Construction generated noise shall be subject to the City of Los Angeles noise ordinance and the provisions of all applicable laws and regulations.

Policies:

1. During final engineering, as part of the design-build construction, a detailed analysis of construction noise impacts will be carried out, and mitigation measures will be developed for inclusion in the construction contract documents.

Implementation Measures:

1.1 The timing and/or sequence of the noisiest construction operations shall be scheduled to avoid sensitive times of the day.

1.2 Nighttime construction shall require the permit approval by the City of Los Angeles.

Policies:

2. Traffic detours which differ from those proposed in the construction phasing and staging shall consider noise and vibration issues.

Policies:

3. Select haul routes, staging areas, idling areas and schedules that minimize intrusion to residential areas and schools.

Policies:

4. Equipment controls

A. Wilshire BRT

Implementation Measures:

4.1 A temporary sound barrier shall be erected around the perimeter of the construction site prior to the commencement of construction activity. This barrier shall remain in place throughout the construction period. Noisy equipment shall be replaced in a timely fashion.

4.2 Perform all construction in a manner to minimize noise.

4.3 Only equipment with mufflers that meet the requirements of State of California regulations shall be used. Equipment and mufflers shall be maintained in good condition, including any subcontractor delivery vehicles. Construction contracts shall specify that all construction equipment shall be equipped with mufflers and other suitable noise attenuation devices.

4.4 The contractor shall notify the Resident Engineer if construction completed by other contracts is violating these standards.

4.5 Solar powered flashing arrow and message boards shall be used in lieu of generator-powered equipment wherever possible to reduce noise and vibration.

4.6 Minimize the use of backup alarms.

4.7 Lay out construction sites such that the noisiest activities are as far as possible from noise-sensitive receptors.

4.8 Construction contracts will require contractors to use Acoustical Engineers to prepare and implement noise and control and monitoring plans. The Noise Control Plans (NCP) will identify equipment to be used on the job and to test and certify that the equipment meets the noise limits set for the project by the adopted environmental documents. It will estimate and predict the impacts that all the Contractor's equipment, working together, will have on nearby sensitive receptors. Where the predicted impacts would exceed project criteria the Acoustical Engineer and Contractor will plan and implement mitigation measures that bring levels within project criteria. Enforcement will be through the Resident Engineer with violations and non-compliance detected by the MTA staff, Quality Inspectors, and Environmental Coordinator or the General Environmental Consultant. Each construction contract will contain special provisions allowing substantial assessments for violations of noise/vibration criteria.

B. Bus Maintenance Facility

See Implementation Measures 4.1 through 4.8, above.

C. Parking Facilities

See Implementation Measures 4.1 through 4.8, above.

Policies:

5. Contractor shall notify the Resident Engineer two (2) weeks in advance of the use of vibratory or impact type equipment.

A. Wilshire BRT

Implementation Measure:

5.1 Notices with specific warnings will be distributed to all potentially affected parties.

B. Bus Maintenance Facility

See Implementation Measures 5.1, above.

C. Parking Facilities

See Implementation Measures 5.1, above.

Policies:

6. During final engineering, as part of the design-build construction, a detailed analysis of construction vibration impact will be carried out and pre-construction surveys will be conducted at properties where the potential for significant vibration impact has been identified.

A. Wilshire BRT

Implementation Measures:

6.1 Specifying vibration limits

6.1 Placing restrictions on where and when high vibration activities such as jackhammering or compaction can take place.

6.3 Requiring vibration monitoring for any construction process that could cause intrusive or damaging vibration.

6.4 If adjacent residents complain about construction vibration, the contractor will be required to modify any procedure or arrange to complete the task in a manner that will cause the minimum amount of hardship for the affected residents.

6.5 Streets along truck hauling routes for the proposed project shall be maintained in good repair to avoid bumps or potholes.

B. Bus Maintenance Facility

See Implementation Measures 6.1 through 6.5, above.

C. Parking Facilities

See Implementation Measures 6.1 through 6.5, above.

II. Drainage and Erosion Control

Description: A Stormwater Pollution Prevention Plan (SWPPP) is required on this project. Erosion control measures shall meet the requirements of the NPDES permit secured by the City of Los Angeles. The Contractor shall be responsible for the preparation and submittal of the plans to be used on this project. Drawings included in the contract may or may not be part of the permitted plan.

Construction will impact water quality primarily due to runoff from exposed excavation surfaces. Control of this runoff and dewatering techniques need to be developed to limit impacts to water quality in storm sewers.

Policies: 1. Development of the Erosion/Sediment Control Plan

A. Wilshire BRT

Implementation Measures:

1.1 A Stormwater Pollution Prevention Plan (SWPPP) shall be prepared by the Contractor in accordance with the State Construction Activity Permit Approval of the SWPPP is separate from approval of other work and will not constitute approval for construction.

1.2 The contract must have provisions that address the impact of ponded water after a rain.

B. Bus Maintenance Facility

See Implementation Measures 1.1 and 1.2, above.

C. Parking Facilities

See Implementation Measures 1.1 and 1.2, above.

Policies: 2. Construction

A. Wilshire BRT

Implementation Measures:

2.1 Inspection of Facilities. The project Inspector shall be responsible for official inspection of erosion control facilities. The Contractor shall inspect the facilities daily and direct maintenance according to plan requirements to meet discharge standards.

B. Bus Maintenance Facility

See Implementation Measures 2.1, above.

C. Parking Facilities

See Implementation Measures 2.1, above.

Policies: 3. Failure to Maintain Facilities

A. Wilshire BRT

Implementation Measures:

3.1 Failure to respond to inspection or the Construction Manager's requirements may result in a stop work order.

3.2 Cost of repairs due to failure to maintain erosion control facilities shall be the Contractor's responsibility.

B. Bus Maintenance Facility

See Implementation Measures 3.1 and 3.2, above.

C. Parking Facilities

See Implementation Measures 3.1 and 3.2, above.

Policies: 4. Control of Runoff Pollution

A. Wilshire BRT

Implementation Measures:

4.1 Runoff discharging from sites containing oil or other fluids shall meet discharge standards.

4.2 Best Management Practices established by the NPDES permit will provide restrictions for fuel, lubricant, and other pollutants to control their storage and use.

B. Bus Maintenance Facility

See Implementation Measures 4.1 and 4.2, above.

C. Parking Facilities

See Implementation Measures 4.1 and 4.2, above.

III. Air Quality

Description: Air quality issues relate to the levels of dust, fumes, and smoke resulting from the construction activities, which includes dust generated from stockpiling or handling materials.

Policies:

1. *Compliance with National, State, and City Standards.* The Contractor must meet applicable code standards stated in the National Ambient Air Quality Standards, State Implementation Plan, City Standard Construction Specification and SCAQMD Rule 403.

A. Wilshire BRT

Implementation Measures:

1.1 Control of Transportation of Materials. Trucks delivering materials with objectionable odors, dirt, soil, or other materials impacting air quality shall be covered during transport.

1.2 Minimize use of on-site diesel construction equipment, particularly unnecessary idling. Construction equipment will be shut off to reduce idling when not in direct use. For each hour equipment is turned off, CO, ROG, NO_x, SO_x, and PM_{10} emissions would be reduced by approximately 0.68, 0.15, 1.7, 0.143, and 0.14 grams, respectively.

1.3 Where feasible, replace diesel equipment with electrically powered machinery. Diesel equipment emits approximately 5.6 grams of CO daily and approximately 13.9 grams of ROG, SO_x, NO_x, and PM_{10} daily. For each diesel equipment replaced, approximately 5.6 grams of CO and 13.9 grams of ROG, SO_x, NO_x, and PM_{10} would be reduced daily.

1.4 Diesel engines, motors, or equipment shall be located as far away as possible from existing residential areas.

1.5 Construction contracts should explicitly stipulate that all diesel-powered equipment should be properly tuned and maintained.

1.6 Haul trucks shall be staged in non-residential areas away from school buildings and playgrounds. To the extent feasible, haul truck routes shall be planned to avoid residential areas.

1.7 Site wetting is a best management practice (BMP) that is effective in controlling fugitive dust from most sources. The Contractor shall use site wetting and other BMPs found in SCAQMD Rule 403 to control fugitive dust. The emission reduction rate for this measure range from approximately 30 to 70 percent for PM_{10}. Reduction levels for the project were discussed in Section 3.8A.2, above.

1.8 Require all trucks hauling dirt, sand, soil, or other loose substances and building materials to be covered, with a tarpaulin from point of origin to point of destination. The emission reduction efficiency rate for this mitigation measure is approximately 7 percent for PM_{10}.

1.9 Utilize efficient (vacuum) street sweeping equipment at site access points and all adjacent streets used by haul trucks or vehicles that have been onsite within thirty minutes of visible dirt deposition (track-out debris). The emission reduction rate for this mitigation measure is approximately 25 percent for PM_{10}.

1.10 Maintain a fugitive dust control program consistent with the provisions of SCAQMD Rule 403 for any grading or earthwork activity.

1.11 Suspend grading operations during first and second stage smog alerts, and during high winds, i.e., greater than 25 miles per hour.

1.12 Construction traffic shall be limited to the minimum number of vehicles required at all times, but especially when air quality problems occur. Carpooling of construction workers and other methods to minimize traffic is encouraged

1.13 All construction areas and their vicinities (500-foot radius) shall be swept and watered such that a 10 percent surface soil moisture content throughout any site grading or excavation activity is maintained.

B. Bus Maintenance Facility

See Implementation Measures 1.1 through 1.13, above.

C. Parking Facilities

See Implementation Measures 1.1 through 1.13, above.

IV. Hazardous Materials Discovery and Removal

Description: Earthwork and grading during construction may expose workers and the public to hazardous materials uncovered during construction.

Policies: Minimize hazardous materials disruptions throughout construction.

A. Wilshire BRT

Implementation measures are not required.

B. Bus Maintenance Facility

Implementation Measures:

1.1 Spot monitoring shall be conducted to determine whether PCBs are generally present, which may indicate a potential for "hotspots" of elevated concentration. Testing shall also be conducted for PCBs in equipment fluids and in underlying oily residues. If elevated concentrations are discovered, remedial actions shall be taken to remove the contaminated material, and treat and remove contaminated soil.

1.2 Soil monitoring shall be conducted beneath the lifts and clarifier to quantify potential subsurface impairment. Any contaminated soil shall be treated and removed in accordance with all applicable laws and regulations.

C. Parking Facilities

Implementation measures are not required.

V. *Archaeological and Paleontological Resources*

Description: Construction sites are often areas that contain cultural resources, such as archaeological, paleontological and historical materials, buried under ground.

Policies: 1. Preserve and document cultural resource findings at the construction sites.

A. Wilshire BRT

Implementation measures are not required.

B. Bus Maintenance Facility

Implementation Measures:

1.1 If buried cultural materials are encountered during construction activities, the activities shall cease until a qualified archeologist has evaluated the significance of the site and made a determination of eligibility for listing on the National Register.

1.2 If human remains are exposed during construction, pursuant to State Health and Safety Code Section 7050.5, no further disturbance shall occur until the county Coroner has made the necessary findings as to origin and disposition, pursuant to Public Resources Code 5097.98.

C. Parking Facilities

Implementation measures are not required.

■ Third Party Claims

I. Claims Resolution Procedures

Policies:

1. *Third Party Claim Procedures.* If lane reconstruction work is undertaken by the City of Los Angeles, all third-party claims against the Project will be routed through the construction hotline, 24-hour number. The Project Community Liaison Officer will monitor, log and return call within two (2) hours for emergencies and 24 hours for more routine calls; and along with the Project's Construction Manager take follow up actions to respond issues identified by callers.

   For processing of all claims, the third-party will be directed to submit a City Claim Form to the City Clerk's Office detailing the incident and estimated cost of damages. The Claim Form is the forwarded to the City's Risk Management Staff in the Finance Department for review. The Construction Manager will be forwarded a copy of the Claim Form and be requested to provide information for the City's insurance adjuster (represented by the Southern California Joint Powers Insurance Authority) of project site background, relationship of the incident to the construction contractor's worksite management, and other such pertinent information. The City's insurance adjuster would then proceed with recommendation to City on the appropriate action for the claim (i.e. tender the claim to the contractor's insurance, settle the claim, forward the claim to the City's insurance carrier, or deny the claim).

   If lane reconstruction work in undertaken by the MTA, a similar process would be established to insure timely response.

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