City Comments

CITY OF LOS ANGELES

CALIFORNIA

ERIC GARCETTI
MAYOR

DEPARTMENT OF
PUBLIC WORKS

BUREAU OF
ENGINEERING

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October 3, 2014

Ms. Laura Cornejo, Director
Countywide Planning
Los Angeles County Metropolitan
Transportation Authority
One Gateway Plaza, MS 99-22-2
Los Angeles, CA 90012

Eastside Transit Corridor Phase 2 Draft Environmental Impact Statement(EIS)/ Environmental Impact Report (EIR)

Ms. Cornejo,

The City of Los Angeles Bureaus of Engineering and Sanitation have reviewed the Draft Eastside Transit Corridor Phase 2 project (Project) EIS/EIR's, which proposes alternatives to construct the Mission Junction Maintenance Yard (MJMY) within the City of Los Angeles (City).

Based on the Project's Draft EIS/EIR, our preliminary findings show that the City has various sewers and stormdrains within and outside of the proposed MJMY site. These existing facilities are shown on the attached sewer and stormdrain GIS maps for your review. In addition to the MJMY option, our understanding is that there are two other sites outside the City of Los Angeles's City limits that are being considered for the Project's future maintenance yard. Once the MJMY site is selected, the MJMY layout should be sent to us for review. Impacts to the City's infrastructure will require the sewers and stormdrains to be relocated, encased, and/or structurally protected with a structural liner.

For any streets that need to be eliminated and/or realign for the MJMY facility, the plans must be submitted to the City for review and approval.

All work within the City shall be in accordance with the latest City and METRO Transit Authority-Master Cooperative Agreement.

Please feel free to contact Curtis Tran of my staff at 213-485-4505 if you have any questions.

Sincerely,

Michael P. Brown, P.E. G.E.
Division Engineer
Street and Stormwater Improvement Division

Enclosures:
1) Sewer Map
2) Storm Drain Map

Cc: Ted Allen, BOE
Ken Redd, BOE
Samara Ali-Ahmad, BOE
Lawrence Hsu, BOE
Hortensia Alsonso, BOE
Edward Arrington, BOE
Brad Jenson, BOE
Maria Martin, BOE
Carol Armstrong, BOE
Ali Poosti, BOS
Fernando Gonzalez, BOS
Kwasi Berko, BOS

DEPARTMENT OF PUBLIC WORKS

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Pipe ID	51501003515051924
Basin	P01
Upstream Invert	263.90
Downstream Invert	258.03
Length	1173.7
Slope	0.0050
Size	48.0
Width	0
Material	CON
Shape	BM
Street	MISSION RD
Block	300
Liner	
Upstream Stationing	65 + 61.56
Downstream Stationing	53 + 87.82
Month / Year Installed	00 / 1935
Number of Laterals	0
Gravity or Force Main	GR
Comments	NORTH OUTFALL SEWER
Number of Wyes	0
Plan Number	~~DL-976~~ DL-926
Supp Plan Number	D-24746
Profile Number	P-4483
Pipe Status	Active
Pipe Ownership	Undefined
Wye Card Number	132A-217D
Calculated Capacity	105.00000
Engineering District	Central
Rehabilitated	NO

Existing Sewers

54 inch Semi-elliptical Concrete North Outfall Sewer (NOS). (NOS Rehab Unit 10)

Maintenance Hole (MH) No. 515-01-002. Depth is approx. 28 feet.

MH No. 515-01-003. Depth is approx. 30 feet from surface. The MH is buried under a huge asphalt pile from the asphalt plant.

15-foot Easement

The rehabilitation of the NOS will require a large pit due to the sewer curve. Therefore design of the proposed maintenance yard will need to account for this requirement.

N

Not to Scale

Limits of the Mission Junction Maintenance Yard

APNs of properties to be purchased by Metro
5410002003
5410002814
5410005001
5410005003
5410005004
5410005005

24" Sewers of different material and construction years. Outside Yard limits.

48 inch Semi-elliptical Concrete NOS. (NOS Rehab Unit 10)

1,425 feet from MH 515-01-003 to MH 515-01-001 s/o 10 Freeway

96" NEIS (In tunnel)

E CHAVEZ AVE

CESAR E CHAVEZ AVE

MISSION ROAD

RICHMOND ST

MISSION ROAD

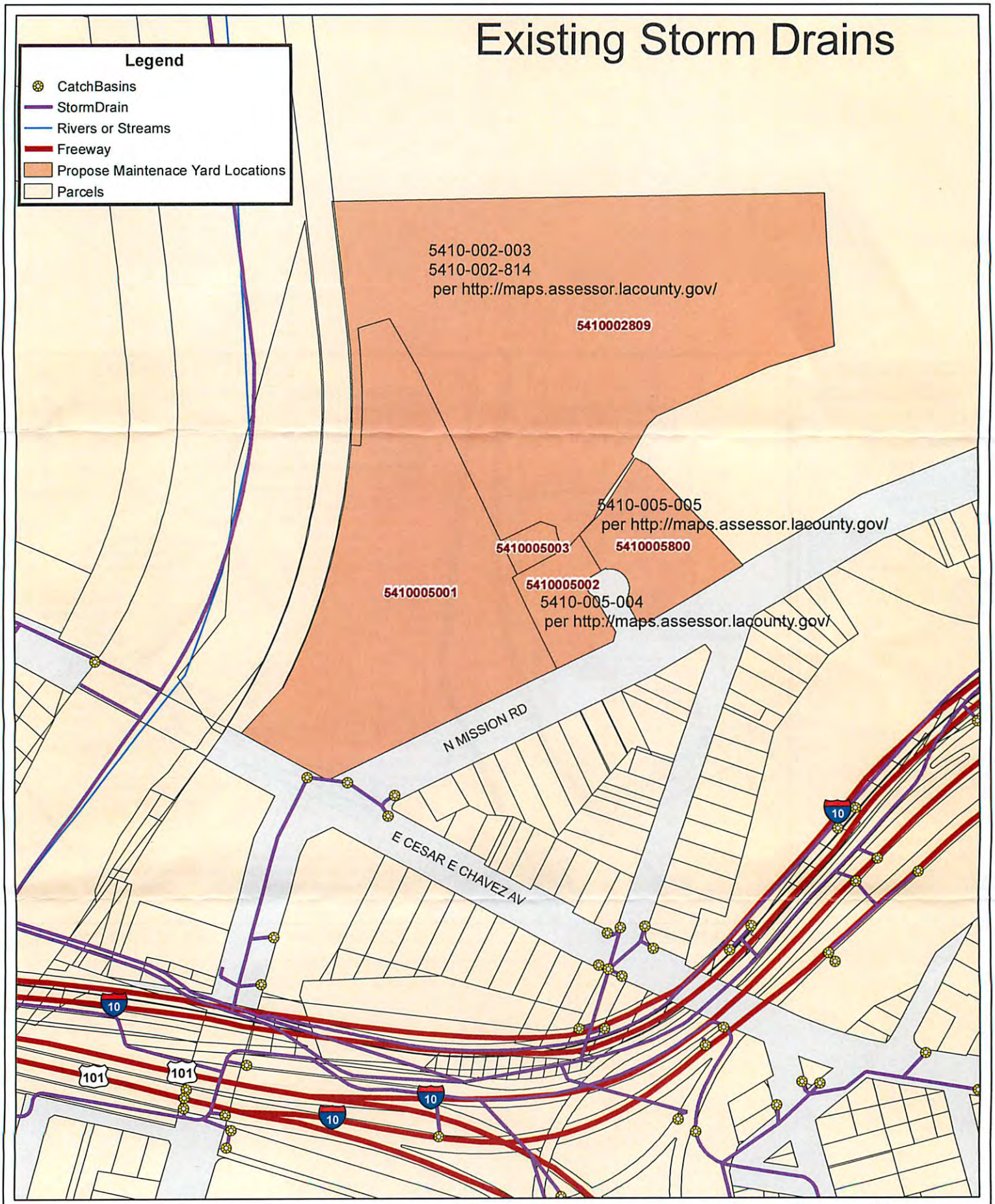
GALILEE

Metro Eastside Transit Corridor Phase 2; *Draft EIS-EIR*
Proposed Mission Junction Maintenance Yard In City of Los Angeles
Tentative Schedules:
Design: Years 2026-2027
Construction: Years 2027-2035

9/11/14 BOE/WCED COMMENTS

Sewer Structures : 51501003-Maintenance Hole | 1 'Sewer Pipes' selected | 1 : 2,179 | 1,840 x 1,348 (ft)

Existing Storm Drains



Produced by GIS Group
Wastewater Engineering Services Division
Bureau of Sanitation
City of Los Angeles

Created September 11, 2014

\\HTPGIS3\GIS_USers\WESD\Projects\Maprequest\MTA\Maintenance Yard\5410005005.mxd

Propose Maintenace Yard Locations

160 80 0 160 Feet

CITY OF MONTEREY PARK

320 West Newmark Avenue • Monterey Park • California 91754-2896
www.montereypark.ca.gov

October 8, 2014

Ms. Laura Cornejo, Director
LOS ANGELES COUNTY
METROPOLITAN TRANSPORTATION AUTHORITY
One Gateway Plaza, MS 99-22-2
Los Angeles, California 90012

Subject: Comments on the August 2014 Draft Environmental Impact Statement/Environmental Impact Report (SCH No. 2010011062) for the Eastside Transit Corridor Phase 2 Project

Dear Ms. Cornejo:

The City of Monterey Park has reviewed the Los Angeles County Metropolitan Transportation Authority's (Metro) August 2014 Draft Environmental Impact Statement/Environmental Impact Report (Draft EIS/EIR) prepared for the Eastside Transit Corridor Phase 2 Project. Given the proximity of the project to the City and the potential for the project to affect our community, we have identified concerns related to the adequacy of the analysis under the National Environmental Policy Act (NEPA) and California Environmental Quality Act (CEQA).

The City's comments on the Draft EIS/EIR are attached for your consideration and review. The City requests that Metro revise the Draft EIS/EIR to fully address the attached comments and recirculate the document for public review to ensure compliance with NEPA/CEQA.

We appreciate the opportunity to review the Draft EIS/EIR for the Eastside Transit Corridor Phase 2 Project and request to be included on any future distribution pertaining to the proposed project. Should you have any questions, please do not hesitate to contact Michael Huntley, Director of Community and Economic Development at 626.307.1315 or at mhuntley@montereypark.ca.gov.

Sincerely,

Paul Talbot
City Manager
City of Monterey Park

SR 60 LRT ALTERNATIVE

1. **The Draft EIS/EIR does not adequately consider planning efforts within the City of Monterey Park.** The City of Monterey Park generally supports the SR 60 LRT Alternative; however, the City has significant concerns that planning efforts within the South Garfield area were not adequately considered especially in regards to economic development efforts along the Garfield Avenue and Pomona Boulevard corridors.

   The City was awarded a Transportation Oriented Development (TOD) Grant by Metro on February 2013 to update the South Garfield Specific Plan. The original plan called for neighborhood scale retail along South Garfield Avenue and Pomona Boulevard. The current uses include small scale retail, offices, and restaurants. The new specific plan renames the area the South Garfield Transit Village. The intent of the specific planning efforts is to take advantage of proximity to the proposed Garfield Avenue station location to enhance business stability, increase retail growth, and support future mixed-use development. Current uses and future intended uses would all be complementary to transit customers exiting a station location or adjacent park-and-ride facility. Furthermore the intent of mixed-use growth in the corridor is to provide access to various transportation modes including pedestrian accessibility to the Gold Line.

   The Draft EIS/EIR acknowledges the South Garfield Specific Plan and indicates a "Transportation" land use. However, there is no consideration by the SR 60 LRT Alternative to support the success of TOD within the South Garfield corridor. In order for access (and thus property values) to be improved along the corridor, the area requires close proximity to the transit facilities. This is important to increase pedestrian and traffic counts in front of retail businesses which makes the area more attractive from a business location standpoint. Furthermore, existing development north of SR 60 already provides walkable access to amenities that transit riders would desire. The area south of SR 60 where the station and park-and-ride are proposed is not conducive to pedestrian access to transit. The area is heavily automobile-oriented and development to the west is constrained by the location of Montebello Municipal Golf Course. Furthermore, singular pedestrian access across SR 60 serves as a barrier to pedestrian movement to the north and will most likely negate any positive impacts of additional vehicle and pedestrian trips to and from the transit station. The transit station will also likely not benefit from additional ridership generated from mixed-use and retail development in the South Garfield Transit Village for the same reason.

   The lack of consideration of support for TOD within the South Garfield corridor is inconsistent with the objective of the TOD Grant and overall vision of Metro. In addition, the City is currently partnered with Bike SGV, Day One, and four other cities within the San Gabriel Valley to create the SGV Bike Master Plan. The Draft SGV Bike Master Plan proposes Pomona Boulevard and Garfield Avenue within the South Garfield Specific Plan Area as Class II bicycle facilities (providing buffered bicycle lanes or cycle-tracks), which would connect to the regional system and provide additional opportunity and demand for access to the proposed Garfield Station from within Monterey Park. This would provide additional access to the park-and-ride and increase the overall effectiveness of the station location north of SR 60 in the South Garfield Transit Village. While this class II facility is proposed to extend on Garfield Avenue south of SR 60, the facility will only connect to existing class III residential streets, signed bicycle routes, and sharrows which are not as effective in generating bicycle trips from less experienced riders. Furthermore, the South Garfield Transit Village Specific Plan proposes a "road

diet" for Pomona Avenue. The current street profile would be reduced from three traffic lanes to two, include on-street parking, a buffered class II bicycle lane and improved sidewalk facilities with streetscaping. These facilities will calm traffic, improve pedestrian safety, and create a more conducive atmosphere for pedestrians and cyclists accessing the transit station and adjacent businesses.

A park-and-ride facility in the vicinity of Garfield Avenue and Pomona Boulevard with a pedestrian bridge connection to the proposed platform would encourage activity within the area and provide a catalyst for revitalization activities. The currently proposed Garfield station park-and-ride facility located south of SR 60 provides no connection to Monterey Park and could essentially eliminate any true opportunity to create TOD within this area. The City requests Metro consider a park-and-ride facility in a shared parking structure concept, similar to the Sierra Madre Villa Metro Station in Pasadena to be located in the vicinity of Garfield Avenue and Pomona Boulevard.

The City has prepared a traffic analysis to determine the potential impacts associated with two Alternatives: 1) the proposed Garfield station park-and-ride facility located on the north side of SR 60 to replace the park-and-ride facility south of SR 60; and 2) a second Garfield station park-and-ride facility located north of SR 60 in addition to the park-and-ride facility south of SR 60. The detailed traffic analysis is provided as an attachment to this comment letter. As anticipated, both Alternatives would increase traffic within the area of the park-and-ride facility at Garfield Avenue and Pomona Boulevard. Although significant impacts would occur under both Alternatives, these impacts can be mitigated by optimizing signal timing splits. Increased vehicular and pedestrian activity would help reinvigorate the South Garfield area and provide much needed visibility and movement within and through the area.

SR 60 LRT ALTERNATIVE - NORTH SIDE DESIGN VARIATION

1. **The Draft EIS/EIR uses the wrong assumptions for the analysis of impacts from the North Side Design Variation.** The Draft EIS/EIR and track alignment plans and profile drawings assume that the berm along the North Side Design Variation would remain in place. However, as indicated on page 3-2 and page 3-23 of the *Monterey Park Market Place Supplemental Environmental Impact Report* (April 2011) (Market Place EIR), the berm would be leveled (i.e., removed) to accommodate the Market Place site plan. Most of this berm material would be used to fill the northwesterly portion of the Market Place project site to accommodate the proposed retail and building pads north of Market Place Drive. The removal of the berm is also depicted in Figure 5.1-1 of the Market Place EIR. Furthermore, project plans for a Caltrans Encroachment Permit associated with removal of the berm were approved in December 2012. Metro has been aware of the Market Place Project, as indicated by its reference throughout the Draft EIS/EIR. Project-specific information has been available to Metro since at least April 2011 as part of the Market Place EIR. The City had also informed Metro of the Market Place project as part of meetings associated with the Eastside Transit Corridor Phase 2 Project and offered to provide the grading plans for the Market Place project; however, Metro staff advised that they were already in possession of the information.

   The Visibility of Local Businesses analysis also incorrectly assumes that the berm between the Operating Industries Inc. (OII) North Parcel (the Market Place project site) and SR-60 would remain in place. On page 4.5-16, the Draft EIS/EIR concludes that "The (mechanically stabilized earth) MSE wall would not obstruct views of the proposed

development given that the wall would be lower than the berm located between the freeway ROW and the OII North Parcel property line." This conclusion is not accurate as the berm would be leveled as part of the Market Place project. Therefore, the conclusions in the Draft EIS/EIR regarding the visibility of local businesses are not reliable, as the elevations would actually be lower than anticipated and a potential impact would occur in this regard. The Draft EIS/EIR must be revised to analyze impacts based on the correct elevations in the project area and if a significant impact would occur, identify mitigation measures to reduce this impact.

2. **The Draft EIS/EIR does not adequately analyze visibility impacts from crossover structures.** Crossover structures would obstruct views to the Market Place project and associated signage from travelers along eastbound SR-60. As the rail alignment transitions from the southern side of SR-60 to the northern side of SR-60 at Greenwood Avenue, the proposed aerial crossover structure would be located in front of the proposed location of a Market Place LED digital billboard sign. Additionally, the crossover structure required to transition the rail alignment back to the south side of SR-60 would obstruct views of westbound traffic to the Market Place site and proposed signage. On Page 4.19-22 the Draft EIS/EIR makes the following conclusory statement:

> *"The signage for this commercial development (Market Place) project ... is anticipated to be taller than the mechanically stabilized earth (MSE) wall associated with SR 60 North Side Design Variation. The MSE wall would not obstruct views of the proposed development, given that the wall would be lower than the berm located between the freeway ROW and the OII North Parcel property line."*

The Draft EIS/EIR does not cite any proposed elevations of Market Place project or the North Side Design Variation. As described above, based on the track alignment plan and profile drawings in Appendix HH (Conceptual Engineering Drawings) of the Draft EIS/EIR, the MSE wall would be 15 to 20 feet above the existing grade in some portions. Additionally, the MSE wall and track alignment would be up to 35 feet above the proposed building pad elevations of the Market Place project. This does not account for the additional 25 feet in height from the train and the overhead catenary system (OCS). The track alignment plan and profile drawings indicate that the track height of the North Side Design Variation would be at an elevation of 435 feet at its highest point. Including the OCS, the entire height would be at an elevation of up to 460 feet. As indicated in the plans in the Market Place EIR, the building pad elevations of the Market Place project would be at approximately 397 feet. The Market Place EIR includes signage plans that include pylon signs that would be 75 feet tall, resulting in an overall elevation of 472 feet at the top of the sign. As the top of the OCS would reach an elevation of 460 feet, the majority of the Market Place signage would be obstructed from SR-60, resulting in a significant impact. The analysis of the North Side Design Variation in the Draft EIS/EIR must be revised to accurately account for the proposed elevations of the Market Place project and the lack of visibility due to the crossover structures.

3. **North Side Design Variation would conflict with the focus area policy to improve the appearance of the SR-60 Freeway frontage bordering the focus area.** The North Side Design Variation would conflict with the City of Monterey Park's ability to successfully redevelop the site to the north (former OII North Parcel) and achieve the project objectives identified for the Market Place Project.

The Market Place project is an important project for the City from an economic development perspective and its visibility from SR 60 and the surrounding area is a primary component of the project, as demonstrated through the extensive coordination with Caltrans and approval of a Caltrans Encroachment Permit (December 2012). The following objectives identified in the *Monterey Park Market Place Supplemental Environmental Impact Report* reinforce its importance:

- Convert the 42.1-acre north parcel of the OII landfill (plus 9 acres of adjacent SCE easements) into a 51.1-acre highway-oriented commercial district that would blend with and enhance existing and future developments in the area.
- Allow redevelopment of the project site to stimulate the local economy, create jobs, and remove regional/local blight, while preserving the environment and public safety.
- Create an attractive environment to motorists traveling on both SR-60 and arterial roadways, while providing visual and acoustic buffering between the development area and adjacent developments.
- Provide opportunities for public transit service at the project site.

The City has significant concerns that the proposed North Side Design Variation would obstruct views of the Market Place project from the SR 60 and would hinder its economic development potential.

Page 4.2-12 of the Draft EIS/EIR indicates that the North Side Design Variation would not conflict with development and reuse of the site to the north. However, as described above, the North Side Design Variation proposes tracks that would be built at-grade and on a MSE wall. According to the track alignment plan and profile drawings in Appendix HH (Conceptual Engineering Drawings), the MSE wall would be 15 to 20 feet above the existing grade in some portions. Additionally, the MSE wall and track alignment would be up to 35 feet above the proposed building pad elevations of the Market Place project. The elevation of SR-60 ranges from approximately 360 feet at the Greenwood Avenue overcrossing to approximately 390 to 395 feet at the overcrossing to the east.

The proposed MSE wall and tracks would also be more than 40 feet above the existing elevation of the freeway at the eastern end of the North Side Design Variation. The grade difference would make the track alignment seem higher. The proposed track elevations would already almost completely block visibility to the Market Place site and the grade difference would further block the line of sight from the freeway.

As stated above, the Draft EIS/EIR does not account for the proposed grade of the Market Place project and incorrectly assumes that the existing berm would remain. The removal of the berm is proposed for the Market Place project in order to increase visibility to the site. The new track and OCS that is proposed at-grade would also obstruct views of the Market Place development and the proposed pylon signs and obelisk signs that would be placed along SR-60. Therefore, the North Side Design Variation would conflict with the land use policies encouraging development and reuse of the Market Place site (former OII North Parcel). The Draft EIS/EIR should be revised to disclose and mitigate this inconsistency with the focus area policy.

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MEMORANDUM

To: Paul Talbot, City Manager, City of Monterey Park
Michael Huntley, Director of Community and Economic Development
Samantha Tewasart, Senior Planner

From: Giancarlo Ganddini, T.E. – RBF Consulting

Date: October 6, 2014

Subject: Gold Line DEIR Review and Alternative Assessment

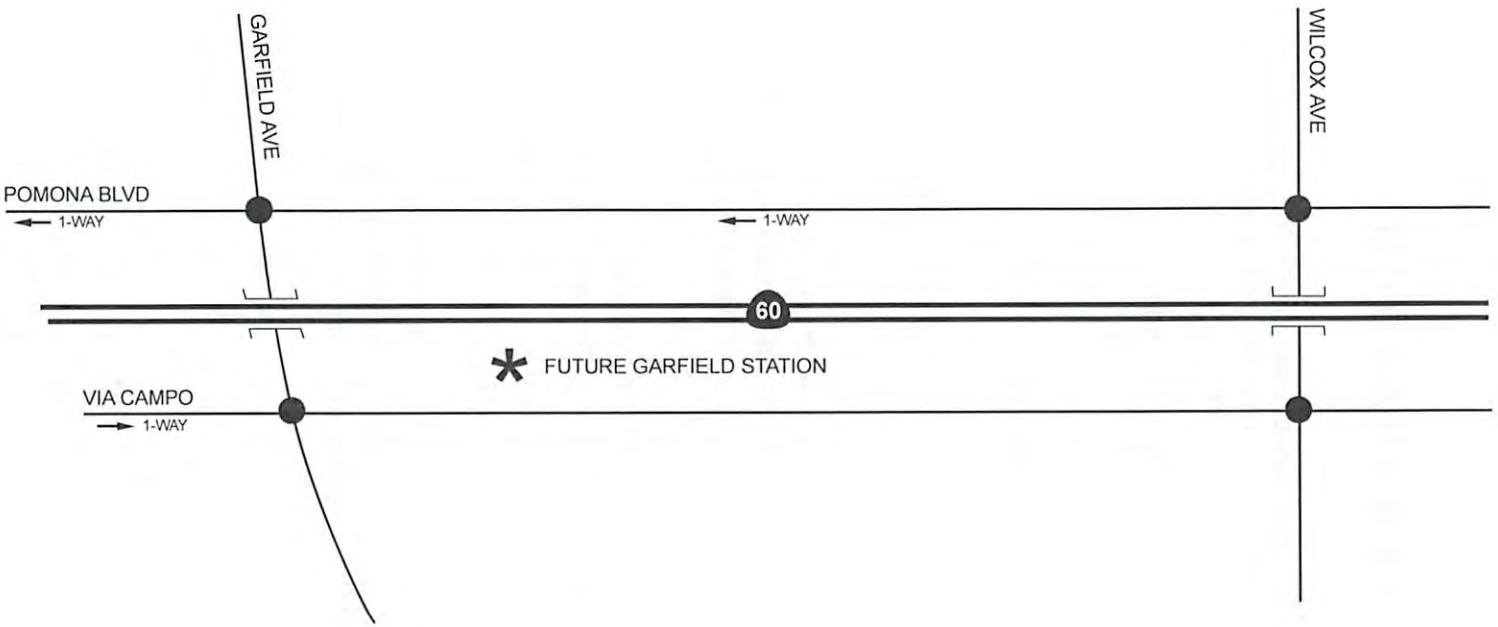
As requested, I have reviewed the transportation impact section of the Eastside Transit Corridor Phase 2 Draft Environmental Impact Statement/Environmental Impact Report (Draft EIS/EIR), hereinafter referred to as "*Draft EIS/EIR*." The *Draft EIS/EIR* includes evaluation of a light rail transit facility parallel to SR-60 with a proposed station and park-and-ride facility located southeast of Garfield Avenue and SR-60 in the City of Montebello. This memorandum has been prepared to document the traffic implications associated with the following two alternatives regarding the park-and-ride facility:

- Alternative 1 – the proposed Garfield station park-and-ride facility is located on the north side of SR-60 in place of the park-and-ride facility south of SR-60;
- Alternative 2 – a second Garfield station park-and-ride facility is located north of SR-60 in addition to the park-and-ride facility south of SR-60.

Based on the location of the proposed Garfield station and park-and-ride facility as analyzed in the *Draft EIS/EIR*, the following four study intersections would be affected by the relocation/addition of a park-and-ride facility to the north side of SR-60 and have been selected for analysis:

- Garfield Avenue/Pomona Boulevard;
- Garfield Avenue/Via Campo;
- Wilcox Avenue/Pomona Boulevard; and
- Wilcox Avenue/Via Campo.

Exhibit 1 illustrates the proposed Garfield station location and study intersections contained in this analysis.



Legend:

● Signal-Controlled Study Intersection

Not to Scale

RBF A Baker Company

H:\pdata\143426\Traffic\Exhibits\Base.ai

OCT/2014

Garfield Station Location and Study Intersections

Exhibit 1

Thresholds of Significance

Consistent with the *Draft EIS/EIR*, the following thresholds of significance have been utilized to evaluate the potential traffic impacts associated with the alternative park-and-ride facility conditions:

- The average delay per vehicle to increase by 10 or more seconds at an intersection that operates at LOS C with the project; or
- The average delay per vehicle to increase by 7.5 or more seconds at an intersection that operates at LOS D with the project; or
- The average delay per vehicle to increase by 5 or more seconds at an intersection that operates at LOS E or LOS F with the project; or
- The LOS to change from A through D under the No Build Alternative (under existing conditions, for the comparison of the project to existing conditions); or
- The LOS to change from LOS E under the No Build Alternative to LOS F under project scenarios.

Trip Generation

To calculate trips forecast to be generated by the proposed Garfield Station park-and-ride facility, data from the *Draft EIS/EIR* was utilized. As shown in the *Draft EIS/EIR* (Appendix II, Table 4-5), 401 daily boardings are forecast to access the Garfield Station via the park-and-ride facility and 65 daily boardings are forecast to access the Garfield Station via kiss-and-ride. Trips associated with the "kiss-and-ride" component have also been included in the trip generation since it is assumed the alternative park-and-ride facility would also include a drop-off area for "kiss-and-ride" operations. The percentage of peak hour trips was derived based on the percentage of peak hour walk trips compared to daily walk trips as shown in the *Draft EIS/EIR* (Appendix M, Table 5-9A and Appendix II, Table 4-5).

Table 1 summarizes the derived trip generation of the currently proposed park-and-ride facility south of SR-60.

For Alternative 1 conditions, it is assumed the total trips generated shown in Table 1 would be redistributed to the park-and-ride facility north of SR-60. For Alternative 2 conditions, it is assumed the two park-and-ride facilities would be half the size of the single park-and-ride facility south of SR-60; therefore, it is forecast that approximately half of the trips would be redistributed to an additional park-and-ride facility north of SR-60.

Table 1
Derived Trip Generation of *Draft EIS/EIR* Park-and-Ride Facility

Mode of Access	Daily Boardings	Vehicle Trips Per Boarding	Trip Generation						
			Daily Trips	AM Peak Hour			PM Peak Hour		
				Peak Hour % of Daily Trips	Peak Hour % Inbound	Peak Hour % Outbound	Peak Hour % of Daily Trips	Peak Hour % Inbound	Peak Hour % Outbound
Park-and-Ride									
Percent Breakdown	-	-	100%	17%	90%	10%	17%	10%	90%
Trips Generated	401	2	802	136	122	14	136	14	122
Kiss-and-Ride									
Percent Breakdown	-	-	100%	17%	50%	50%	17%	50%	50%
Trips Generated	65	4	260	44	22	22	44	22	22
Total Trips Generated (for Alternative 1 Conditions)			**1,062**	**180**	**144**	**36**	**180**	**36**	**144**
Half of Trips Generated (for Alternative 2 Conditions)			**534**	**90**	**72**	**18**	**90**	**18**	**72**

Source: derived based on Dr*aft EIS/EIR* (Appendix II, Table 4-5 and Appendix M, Table 5-9A).

Forecast Year 2035 Conditions

To provide a fair comparison and assessment of potential impacts, the future year 2035 no build conditions analyzed in the *Draft EIS/EIR* were replicated as closely as possible. Table 2 summarizes the Forecast Year 2035 No Build conditions a.m. and p.m. peak hour Level of Service (LOS) of the study intersections; detailed LOS analysis sheets are contained in Appendix A.

Table 2
Forecast Year 2035 No Build
Conditions AM & PM Peak Hour Intersection LOS

Study Intersection	Delay – LOS	
	AM Peak Hour	PM Peak Hour
1. Garfield Ave/Pomona Blvd	166.1 – F	79.6 – E
2. Garfield Ave/Via Campo	47.3 – D	159.4 – F
3. Wilcox Ave/Pomona Blvd	40.8 – D	41.9 – D
4. Wilcox Ave/Via Campo	41.7 – D	54.5 – D

Forecast Year 2035 With Alternative 1 and Forecast Year 2035 With Alternative 2 traffic volumes were derived by utilizing the traffic volumes for the year 2035 with SR-60 light rail transit alternative contained in the *Draft EIS/EIR* and redistributing the trips derived in Table 1; detailed redistribution volumes are contained in Appendix B.

Forecast Year 2035 with Alternative 1 Conditions Study Intersection Level of Service

Table 3 summarizes forecast year 2035 with Alternative 1 conditions a.m. peak hour and p.m. peak hour LOS of the study intersections; detailed LOS analysis sheets are contained in Appendix A.

Table 3
Forecast Year 2035 With Alternative 1
Conditions AM & PM Peak Hour Intersection LOS

Study Intersection	Forecast Year 2035 No Build Conditions		Forecast Year 2035 with Alternative 1 Conditions		Change in Delay		Significant Impact?
	Delay – LOS		Delay – LOS		AM Peak Hour	PM Peak Hour	
	AM Peak Hour	PM Peak Hour	AM Peak Hour	PM Peak Hour			
1. Garfield Ave/Pomona Blvd	166.1 – F	79.6 – E	166.5 – F	84.8 – F	0.4	5.2	**Yes**
2. Garfield Ave/Via Campo	47.3 – D	159.4 – F	45.7 – D	166.3 – F	-1.6	6.9	**Yes**
3. Wilcox Ave/Pomona Blvd	40.8 – D	41.9 – D	43.8 – D	45.3 – D	3.0	3.4	No
4. Wilcox Ave/Via Campo	41.7 – D	54.5 – D	43.6 – D	56.5 – E	1.9	2.0	**Yes**

As shown in Table 3, based on the established thresholds of significance, the relocation of the Garfield station park-and-ride facility to the north side of SR-60 is forecast to result in a significant impact at the following three (3) study intersections for forecast year 2035 with Alternative 1 conditions:

- Garfield Avenue/Pomona Boulevard (p.m. peak hour only);
- Garfield Avenue/Via Campo (p.m. peak hour only); and
- Wilcox Avenue/Via Campo (p.m. peak hour only.

For comparison, the three significantly impacted study intersections for forecast year 2035 with Alternative 1 conditions were not identified to be significantly impacted in the *Draft EIS/EIR*.

The recommended mitigation measure at each of the significantly impact study intersections for forecast year 2035 with Alternative 1 conditions consists of optimizing signal timing splits. Table 4 shows the forecast LOS of the significantly impacted study intersections assuming

implementation of the recommended mitigation measure for forecast year 2035 with Alternative 1 conditions; detailed LOS analysis sheets are contained in Appendix A.

Table 4
Mitigated Forecast Year 2035 With Alternative 1 Conditions AM & PM Peak Hour Intersection LOS

Study Intersection	Forecast Year 2035 No Build Conditions		Mitigated Forecast Year 2035 with Alternative 1 Conditions		Change in Delay		Significant Impact?
	Delay – LOS		Delay – LOS		AM Peak Hour	PM Peak Hour	
	AM Peak Hour	PM Peak Hour	AM Peak Hour	PM Peak Hour			
1. Garfield Ave/Pomona Blvd	166.1 – F	79.6 – E	166.5 – F	76.6 – E	0.4	-3.0	No
2. Garfield Ave/Via Campo	47.3 – D	159.4 – F	45.7 – D	162.0 – F	-1.6	2.6	No
4. Wilcox Ave/Via Campo	41.7 – D	54.5 – D	43.6 – D	47.6 – D	1.9	-6.9	No

Forecast Year 2035 with Alternative 2 Conditions Study Intersection Level of Service

Table 5 summarizes forecast year 2035 with Alternative 2 conditions a.m. peak hour and p.m. peak hour LOS of the study intersections; detailed LOS analysis sheets are contained in Appendix A.

Table 5
Forecast Year 2035 With Alternative 2 Conditions AM & PM Peak Hour Intersection LOS

Study Intersection	Forecast Year 2035 No Build Conditions		Forecast Year 2035 with Alternative 2 Conditions		Change in Delay		Significant Impact?
	Delay – LOS		Delay – LOS		AM Peak Hour	PM Peak Hour	
	AM Peak Hour	PM Peak Hour	AM Peak Hour	PM Peak Hour			
1. Garfield Ave/Pomona Blvd	166.1 – F	79.6 – E	164.7 – F	79.1 – E	-1.4	-0.5	No
2. Garfield Ave/Via Campo	47.3 – D	159.4 – F	45.3 – D	158.8 – F	-2.0	-0.6	No
3. Wilcox Ave/Pomona Blvd	40.8 – D	41.9 – D	42.0 – D	45.3 – D	1.2	3.4	No
4. Wilcox Ave/Via Campo	41.7 – D	54.5 – D	43.2 – D	56.4 – E	1.5	1.9	**Yes**

As shown in Table 5, based on the established thresholds of significance, the addition of a second Garfield station park-and-ride facility on the north side of SR-60 is forecast to result in a significant impact at the Wilcox Avenue/Via Campo study intersection during the p.m. peak hour only for forecast year 2035 with Alternative 2 conditions.

For comparison, the significantly impacted Wilcox Avenue/Via Campo study intersection for forecast year 2035 with Alternative 2 conditions was not identified to be significantly impacted in the *Draft EIS/EIR*.

The recommended mitigation measure at the significantly impact study intersection for forecast year 2035 with Alternative 2 conditions consists of optimizing signal timing splits. Table 6 shows the forecast LOS of the significantly impacted study intersection assuming implementation of the recommended mitigation measure for forecast year 2035 with Alternative 2 conditions; detailed LOS analysis sheets are contained in Appendix A.

Table 6
Mitigated Forecast Year 2035 With Alternative 2 Conditions AM & PM Peak Hour Intersection LOS

Study Intersection	Forecast Year 2035 No Build Conditions		Mitigated Forecast Year 2035 with Alternative 2 Conditions		Change in Delay		Significant Impact?
	Delay – LOS		Delay – LOS		AM Peak Hour	PM Peak Hour	
	AM Peak Hour	PM Peak Hour	AM Peak Hour	PM Peak Hour			
4. Wilcox Ave/Via Campo	41.7 – D	54.5 – D	43.2 – D	47.5 – D	1.5	-7.0	No

Comparison to Draft EIS/EIR

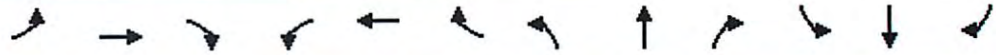
Alternative 1 Conditions: The relocation of the Garfield station park-and-ride facility to the north side of SR-60 is forecast to result in a significant impact at three additional study intersections when compared to the *Draft EIS/EIR*. With signal timing improvements, these impacts can be mitigated to a level considered less than significant.

Alternative 2 Conditions: The addition of a second Garfield station park-and-ride facility to the north side of SR-60 is forecast to result in a significant impact at one additional study intersection when compared to the *Draft EIS/EIR*. With signal timing improvements, this impact can be mitigated to a level considered less than significant.

Please contact me with any questions at 949.855.7085 – Giancarlo

APPENDIX A
LOS Analysis Sheets

Forecast Year 2035
No Build Conditions



Movement	EBL	EBT	EBR	WBL	WBT	WBR	NBL	NBT	NBR	SBL	SBT	SBR
Lane Configurations												
Volume (vph)	0	0	0	362	1499	255	1152	520	0	0	538	402
Ideal Flow (vphpl)	1850	1850	1850	1850	1850	1850	1850	1850	1850	1850	1850	1850
Total Lost time (s)					4.5	4.5	4.5	4.5			4.5	4.5
Lane Util. Factor					0.91	1.00	0.91	0.91			0.95	1.00
Frt					1.00	0.85	1.00	1.00			1.00	0.85
Flt Protected					0.99	1.00	0.95	0.97			1.00	1.00
Satd. Flow (prot)					4547	1430	1454	2983			3195	1430
Flt Permitted					0.99	1.00	0.95	0.97			1.00	1.00
Satd. Flow (perm)					4547	1430	1454	2983			3195	1430
Peak-hour factor, PHF	0.98	0.98	0.98	0.98	0.98	0.98	0.98	0.98	0.98	0.98	0.98	0.98
Adj. Flow (vph)	0	0	0	369	1530	260	1176	531	0	0	549	410
RTOR Reduction (vph)	0	0	0	0	0	67	0	0	0	0	0	2
Lane Group Flow (vph)	0	0	0	0	1899	193	588	1119	0	0	549	408
Turn Type				Perm	NA	Perm	Split	NA			NA	Perm
Protected Phases					4		1	1			2	
Permitted Phases				4		4						2
Actuated Green, G (s)					30.5	30.5	29.5	29.5			26.5	26.5
Effective Green, g (s)					30.5	30.5	29.5	29.5			26.5	26.5
Actuated g/C Ratio					0.30	0.30	0.29	0.29			0.26	0.26
Clearance Time (s)					4.5	4.5	4.5	4.5			4.5	4.5
Vehicle Extension (s)					4.0	4.0	5.0	5.0			5.0	5.0
Lane Grp Cap (vph)					1386	436	428	879			846	378
v/s Ratio Prot							c0.40	0.38			0.17	
v/s Ratio Perm					0.42	0.13						c0.29
v/c Ratio					1.37	0.44	1.37	1.27			0.65	1.08
Uniform Delay, d1					34.8	27.9	35.2	35.2			32.6	36.8
Progression Factor					1.00	1.00	1.56	1.56			1.00	1.00
Incremental Delay, d2					171.2	1.0	175.7	127.5			2.4	69.0
Delay (s)					206.0	28.9	230.8	182.6			35.0	105.7
Level of Service					F	C	F	F			C	F
Approach Delay (s)		0.0			184.7			199.2			65.2	
Approach LOS		A			F			F			E	

Intersection Summary			
HCM 2000 Control Delay	166.1	HCM 2000 Level of Service	F
HCM 2000 Volume to Capacity ratio	1.28		
Actuated Cycle Length (s)	100.0	Sum of lost time (s)	13.5
Intersection Capacity Utilization	106.9%	ICU Level of Service	G
Analysis Period (min)	15		
c Critical Lane Group			

Movement	EBL	EBT	EBR	WBL	WBT	WBR	NBL	NBT	NBR	SBL	SBT	SBR
Lane Configurations												
Volume (vph)	155	832	399	37	0	344	0	1159	289	156	730	0
Ideal Flow (vphpl)	1850	1850	1850	1850	1850	1850	1850	1850	1850	1850	1850	1850
Total Lost time (s)	5.0	5.0	5.0	5.0		4.5		5.0	5.0	4.5	4.5	
Lane Util. Factor	1.00	0.95	1.00	1.00		1.00		0.91	1.00	0.91	0.91	
Frt	1.00	1.00	0.85	1.00		0.85		1.00	0.85	1.00	1.00	
Flt Protected	0.95	1.00	1.00	0.95		1.00		1.00	1.00	0.95	1.00	
Satd. Flow (prot)	1598	3195	1430	1598		1430		4591	1430	1454	3058	
Flt Permitted	0.95	1.00	1.00	0.15		1.00		1.00	1.00	0.95	1.00	
Satd. Flow (perm)	1598	3195	1430	263		1430		4591	1430	1454	3058	
Peak-hour factor, PHF	0.98	0.98	0.98	0.98	0.98	0.98	0.98	0.98	0.98	0.98	0.98	0.98
Adj. Flow (vph)	158	849	407	38	0	351	0	1183	295	159	745	0
RTOR Reduction (vph)	0	0	164	0	0	251	0	0	137	0	0	0
Lane Group Flow (vph)	158	849	243	38	0	100	0	1183	158	143	761	0
Turn Type	Perm	NA	custom	D.Pm		Over		NA	Perm	Split	NA	
Protected Phases		4	2			1		2		1	1	
Permitted Phases	4			4					2			
Actuated Green, G (s)	32.0	32.0	25.0	32.0		28.5		25.0	25.0	28.5	28.5	
Effective Green, g (s)	32.0	32.0	25.0	32.0		28.5		25.0	25.0	28.5	28.5	
Actuated g/C Ratio	0.32	0.32	0.25	0.32		0.28		0.25	0.25	0.28	0.28	
Clearance Time (s)	5.0	5.0	5.0	5.0		4.5		5.0	5.0	4.5	4.5	
Vehicle Extension (s)	4.0	4.0	5.0	4.0		5.0		5.0	5.0	5.0	5.0	
Lane Grp Cap (vph)	511	1022	357	84		407		1147	357	414	871	
v/s Ratio Prot		c0.27	0.17			0.07		c0.26		0.10	c0.25	
v/s Ratio Perm	0.10			0.14					0.11			
v/c Ratio	0.31	0.83	0.68	0.45		0.25		1.03	0.44	0.35	0.87	
Uniform Delay, d1	25.7	31.5	33.9	27.0		27.5		37.5	31.6	28.4	34.0	
Progression Factor	1.00	1.00	1.00	1.00		1.00		1.00	1.00	1.07	1.10	
Incremental Delay, d2	0.5	6.1	10.0	5.2		1.4		35.0	3.9	0.8	4.6	
Delay (s)	26.1	37.6	43.9	32.2		28.9		72.5	35.5	31.1	42.1	
Level of Service	C	D	D	C		C		E	D	C	D	
Approach Delay (s)		38.1			29.2			65.1			40.4	
Approach LOS		D			C			E			D	

Intersection Summary			
HCM 2000 Control Delay	47.3	HCM 2000 Level of Service	D
HCM 2000 Volume to Capacity ratio	0.90		
Actuated Cycle Length (s)	100.0	Sum of lost time (s)	14.5
Intersection Capacity Utilization	86.1%	ICU Level of Service	E
Analysis Period (min)	15		
c Critical Lane Group			

Movement	EBL	EBT	EBR	WBL	WBT	WBR	NBL	NBT	NBR	SBL	SBT	SBR
Lane Configurations												
Volume (vph)	0	0	0	335	1283	51	627	481	0	0	406	70
Ideal Flow (vphpl)	1850	1850	1850	1850	1850	1850	1850	1850	1850	1850	1850	1850
Total Lost time (s)					4.5		4.5	4.5			3.5	
Lane Util. Factor					0.91		0.97	0.95			0.95	
Frt					1.00		1.00	1.00			0.98	
Flt Protected					0.99		0.95	1.00			1.00	
Satd. Flow (prot)					4525		3100	3195			3125	
Flt Permitted					0.99		0.95	1.00			1.00	
Satd. Flow (perm)					4525		3100	3195			3125	
Peak-hour factor, PHF	0.98	0.98	0.98	0.98	0.98	0.98	0.98	0.98	0.98	0.98	0.98	0.98
Adj. Flow (vph)	0	0	0	342	1309	52	640	491	0	0	414	71
RTOR Reduction (vph)	0	0	0	0	4	0	0	0	0	0	13	0
Lane Group Flow (vph)	0	0	0	0	1699	0	640	491	0	0	472	0
Turn Type				Perm	NA		Prot	NA			NA	
Protected Phases					1		2	2 3			3	
Permitted Phases				1								
Actuated Green, G (s)					29.5		19.8	41.5			18.2	
Effective Green, g (s)					29.5		19.8	38.0			18.2	
Actuated g/C Ratio					0.37		0.25	0.48			0.23	
Clearance Time (s)					4.5		4.5				3.5	
Vehicle Extension (s)					5.0		5.0				5.0	
Lane Grp Cap (vph)					1668		767	1517			710	
v/s Ratio Prot							c0.21	0.15			c0.15	
v/s Ratio Perm					0.38							
v/c Ratio					1.02		0.83	0.32			0.66	
Uniform Delay, d1					25.2		28.5	13.0			28.1	
Progression Factor					1.00		1.00	1.00			1.00	
Incremental Delay, d2					26.8		10.4	0.3			3.1	
Delay (s)					52.1		38.9	13.3			31.2	
Level of Service					D		D	B			C	
Approach Delay (s)		0.0			52.1			27.8			31.2	
Approach LOS		A			D			C			C	

Intersection Summary			
HCM 2000 Control Delay	40.8	HCM 2000 Level of Service	D
HCM 2000 Volume to Capacity ratio	0.87		
Actuated Cycle Length (s)	80.0	Sum of lost time (s)	12.5
Intersection Capacity Utilization	76.6%	ICU Level of Service	D
Analysis Period (min)	15		
c Critical Lane Group			

Movement	EBL	EBT	EBR	WBL	WBT	WBR	NBL	NBT	NBR	SBL	SBT	SBR
Lane Configurations												
Volume (vph)	20	884	299	32	94	58	348	1053	206	122	514	41
Ideal Flow (vphpl)	1850	1850	1850	1850	1850	1850	1850	1850	1850	1850	1850	1850
Total Lost time (s)		4.5			4.5		3.5	4.5	4.5	3.5	4.5	
Lane Util. Factor		0.91			0.95		1.00	0.91	1.00	1.00	0.95	
Frt		0.96			0.95		1.00	1.00	0.85	1.00	0.99	
Flt Protected		1.00			0.99		0.95	1.00	1.00	0.95	1.00	
Satd. Flow (prot)		4417			3019		1598	4591	1430	1598	3160	
Flt Permitted		1.00			0.99		0.95	1.00	1.00	0.95	1.00	
Satd. Flow (perm)		4417			3019		1598	4591	1430	1598	3160	
Peak-hour factor, PHF	0.98	0.98	0.98	0.98	0.98	0.98	0.98	0.98	0.98	0.98	0.98	0.98
Adj. Flow (vph)	20	902	305	33	96	59	355	1074	210	124	524	42
RTOR Reduction (vph)	0	66	0	0	56	0	0	0	82	0	7	0
Lane Group Flow (vph)	0	1161	0	0	132	0	355	1074	128	124	559	0
Turn Type	Split	NA		Split	NA		Prot	NA	Perm	Prot	NA	
Protected Phases	4	4		3	3		5	2		1	6	
Permitted Phases									2			
Actuated Green, G (s)		27.3			5.5		18.7	30.5	30.5	9.7	21.5	
Effective Green, g (s)		27.3			5.5		18.7	30.5	30.5	9.7	21.5	
Actuated g/C Ratio		0.30			0.06		0.21	0.34	0.34	0.11	0.24	
Clearance Time (s)		4.5			4.5		3.5	4.5	4.5	3.5	4.5	
Vehicle Extension (s)		3.0			5.0		5.0	1.0	1.0	1.0	5.0	
Lane Grp Cap (vph)		1339			184		332	1555	484	172	754	
v/s Ratio Prot		c0.26			c0.04		c0.22	c0.23		0.08	0.18	
v/s Ratio Perm									0.09			
v/c Ratio		0.87			0.72		1.07	0.69	0.26	0.72	0.74	
Uniform Delay, d1		29.6			41.5		35.6	25.7	21.6	38.8	31.7	
Progression Factor		1.00			1.00		1.00	1.00	1.00	1.00	1.00	
Incremental Delay, d2		6.2			15.2		69.0	2.5	1.3	22.9	6.5	
Delay (s)		35.8			56.7		104.6	28.2	22.9	61.7	38.2	
Level of Service		D			E		F	C	C	E	D	
Approach Delay (s)		35.8			56.7			44.1			42.4	
Approach LOS		D			E			D			D	

Intersection Summary			
HCM 2000 Control Delay	41.7	HCM 2000 Level of Service	D
HCM 2000 Volume to Capacity ratio	0.88		
Actuated Cycle Length (s)	90.0	Sum of lost time (s)	17.0
Intersection Capacity Utilization	80.7%	ICU Level of Service	D
Analysis Period (min)	15		
c Critical Lane Group			

Movement	EBL	EBT	EBR	WBL	WBT	WBR	NBL	NBT	NBR	SBL	SBT	SBR
Lane Configurations												
Volume (vph)	0	0	0	319	1024	337	550	849	0	0	871	121
Ideal Flow (vphpl)	1850	1850	1850	1850	1850	1850	1850	1850	1850	1850	1850	1850
Total Lost time (s)					4.5	4.5	4.5	4.5			4.5	4.5
Lane Util. Factor					0.91	1.00	0.91	0.91			0.95	1.00
Frt					1.00	0.85	1.00	1.00			1.00	0.85
Flt Protected					0.99	1.00	0.95	0.99			1.00	1.00
Satd. Flow (prot)					4537	1430	1454	3045			3195	1430
Flt Permitted					0.99	1.00	0.95	0.99			1.00	1.00
Satd. Flow (perm)					4537	1430	1454	3045			3195	1430
Peak-hour factor, PHF	0.98	0.98	0.98	0.98	0.98	0.98	0.98	0.98	0.98	0.98	0.98	0.98
Adj. Flow (vph)	0	0	0	326	1045	344	561	866	0	0	889	123
RTOR Reduction (vph)	0	0	0	0	0	124	0	0	0	0	0	37
Lane Group Flow (vph)	0	0	0	0	1371	220	460	967	0	0	889	86
Turn Type				Perm	NA	Perm	Split	NA			NA	Perm
Protected Phases					4		1	1			2	
Permitted Phases				4		4						2
Actuated Green, G (s)					28.5	28.5	32.5	32.5			25.5	25.5
Effective Green, g (s)					28.5	28.5	32.5	32.5			25.5	25.5
Actuated g/C Ratio					0.28	0.28	0.32	0.32			0.26	0.26
Clearance Time (s)					4.5	4.5	4.5	4.5			4.5	4.5
Vehicle Extension (s)					4.0	4.0	5.0	5.0			5.0	5.0
Lane Grp Cap (vph)					1293	407	472	989			814	364
v/s Ratio Prot							0.32	c0.32			c0.28	
v/s Ratio Perm					0.30	0.15						0.06
v/c Ratio					1.06	0.54	0.97	0.98			1.09	0.24
Uniform Delay, d1					35.8	30.2	33.3	33.4			37.2	29.5
Progression Factor					1.00	1.00	1.91	1.91			1.00	1.00
Incremental Delay, d2					42.7	1.8	28.6	18.9			59.7	0.7
Delay (s)					78.5	32.1	92.3	82.6			96.9	30.2
Level of Service					E	C	F	F			F	C
Approach Delay (s)		0.0			69.1			85.7			88.8	
Approach LOS		A			E			F			F	

Intersection Summary			
HCM 2000 Control Delay	79.6	HCM 2000 Level of Service	E
HCM 2000 Volume to Capacity ratio	1.04		
Actuated Cycle Length (s)	100.0	Sum of lost time (s)	13.5
Intersection Capacity Utilization	90.0%	ICU Level of Service	E
Analysis Period (min)	15		
c Critical Lane Group			

Movement	EBL	EBT	EBR	WBL	WBT	WBR	NBL	NBT	NBR	SBL	SBT	SBR
Lane Configurations												
Volume (vph)	163	1510	817	45	0	109	0	1121	330	397	799	0
Ideal Flow (vphpl)	1850	1850	1850	1850	1850	1850	1850	1850	1850	1850	1850	1850
Total Lost time (s)	5.0	5.0	5.0	5.0		4.5		5.0	5.0	4.5	4.5	
Lane Util. Factor	1.00	0.95	1.00	1.00		1.00		0.91	1.00	0.91	0.91	
Frt	1.00	1.00	0.85	1.00		0.85		1.00	0.85	1.00	1.00	
Flt Protected	0.95	1.00	1.00	0.95		1.00		1.00	1.00	0.95	1.00	
Satd. Flow (prot)	1598	3195	1430	1598		1430		4591	1430	1454	3054	
Flt Permitted	0.95	1.00	1.00	0.11		1.00		1.00	1.00	0.95	1.00	
Satd. Flow (perm)	1598	3195	1430	192		1430		4591	1430	1454	3054	
Peak-hour factor, PHF	0.98	0.98	0.98	0.98	0.98	0.98	0.98	0.98	0.98	0.98	0.98	0.98
Adj. Flow (vph)	166	1541	834	46	0	111	0	1144	337	405	815	0
RTOR Reduction (vph)	0	0	180	0	0	88	0	0	20	0	0	0
Lane Group Flow (vph)	166	1541	654	46	0	23	0	1144	317	364	856	0
Turn Type	Perm	NA	custom	D.Pm		Over		NA	Perm	Split	NA	
Protected Phases		4	2			1		2		1	1	
Permitted Phases	4			4					2			
Actuated Green, G (s)	35.0	35.0	30.0	35.0		20.5		30.0	30.0	20.5	20.5	
Effective Green, g (s)	35.0	35.0	30.0	35.0		20.5		30.0	30.0	20.5	20.5	
Actuated g/C Ratio	0.35	0.35	0.30	0.35		0.20		0.30	0.30	0.20	0.20	
Clearance Time (s)	5.0	5.0	5.0	5.0		4.5		5.0	5.0	4.5	4.5	
Vehicle Extension (s)	4.0	4.0	5.0	4.0		5.0		5.0	5.0	5.0	5.0	
Lane Grp Cap (vph)	559	1118	429	67		293		1377	429	298	626	
v/s Ratio Prot		c0.48	c0.46			0.02		0.25		0.25	c0.28	
v/s Ratio Perm	0.10			0.24					0.22			
v/c Ratio	0.30	1.38	1.52	0.69		0.08		0.83	0.74	1.22	1.37	
Uniform Delay, d1	23.6	32.5	35.0	27.8		32.1		32.6	31.5	39.8	39.8	
Progression Factor	1.00	1.00	1.00	1.00		1.00		1.00	1.00	1.15	1.15	
Incremental Delay, d2	0.4	175.9	247.7	27.2		0.5		6.0	10.8	102.6	166.3	
Delay (s)	24.0	208.4	282.7	55.0		32.6		38.6	42.3	148.1	211.8	
Level of Service	C	F	F	E		C		D	D	F	F	
Approach Delay (s)		220.8			39.2			39.4			192.8	
Approach LOS		F			D			D			F	

Intersection Summary			
HCM 2000 Control Delay	159.4	HCM 2000 Level of Service	F
HCM 2000 Volume to Capacity ratio	1.43		
Actuated Cycle Length (s)	100.0	Sum of lost time (s)	14.5
Intersection Capacity Utilization	100.2%	ICU Level of Service	G
Analysis Period (min)	15		
c Critical Lane Group			

Movement	EBL	EBT	EBR	WBL	WBT	WBR	NBL	NBT	NBR	SBL	SBT	SBR
Lane Configurations												
Volume (vph)	0	0	0	400	1332	78	436	336	0	0	388	27
Ideal Flow (vphpl)	1850	1850	1850	1850	1850	1850	1850	1850	1850	1850	1850	1850
Total Lost time (s)					4.5		4.5	4.5			3.5	
Lane Util. Factor					0.91		0.97	0.95			0.95	
Frt					0.99		1.00	1.00			0.99	
Flt Protected					0.99		0.95	1.00			1.00	
Satd. Flow (prot)					4512		3100	3195			3164	
Flt Permitted					0.99		0.95	1.00			1.00	
Satd. Flow (perm)					4512		3100	3195			3164	
Peak-hour factor, PHF	0.98	0.98	0.98	0.98	0.98	0.98	0.98	0.98	0.98	0.98	0.98	0.98
Adj. Flow (vph)	0	0	0	408	1359	80	445	343	0	0	396	28
RTOR Reduction (vph)	0	0	0	0	6	0	0	0	0	0	6	0
Lane Group Flow (vph)	0	0	0	0	1841	0	445	343	0	0	418	0
Turn Type				Perm	NA		Prot	NA			NA	
Protected Phases					1		2	2 3			3	
Permitted Phases				1								
Actuated Green, G (s)					31.8		17.5	40.2			18.2	
Effective Green, g (s)					31.8		17.5	40.2			18.2	
Actuated g/C Ratio					0.40		0.22	0.50			0.23	
Clearance Time (s)					4.5		4.5				3.5	
Vehicle Extension (s)					5.0		5.0				5.0	
Lane Grp Cap (vph)					1793		678	1605			719	
v/s Ratio Prot							c0.14	0.11			c0.13	
v/s Ratio Perm					0.41							
v/c Ratio					1.03		0.66	0.21			0.58	
Uniform Delay, d1					24.1		28.5	11.1			27.5	
Progression Factor					1.00		1.00	1.00			1.00	
Incremental Delay, d2					28.4		4.9	0.1			1.9	
Delay (s)					52.5		33.4	11.2			29.4	
Level of Service					D		C	B			C	
Approach Delay (s)		0.0			52.5			23.8			29.4	
Approach LOS		A			D			C			C	

Intersection Summary			
HCM 2000 Control Delay	41.9	HCM 2000 Level of Service	D
HCM 2000 Volume to Capacity ratio	0.81		
Actuated Cycle Length (s)	80.0	Sum of lost time (s)	12.5
Intersection Capacity Utilization	72.1%	ICU Level of Service	C
Analysis Period (min)	15		
c Critical Lane Group			

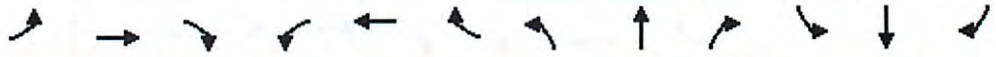
Movement	EBL	EBT	EBR	WBL	WBT	WBR	NBL	NBT	NBR	SBL	SBT	SBR
Lane Configurations												
Volume (vph)	56	1496	537	12	17	58	123	628	284	166	619	29
Ideal Flow (vphpl)	1850	1850	1850	1850	1850	1850	1850	1850	1850	1850	1850	1850
Total Lost time (s)		4.5			4.5		3.5	4.5	4.5	3.5	4.5	
Lane Util. Factor		0.91			0.95		1.00	0.91	1.00	1.00	0.95	
Frt		0.96			0.90		1.00	1.00	0.85	1.00	0.99	
Flt Protected		1.00			0.99		0.95	1.00	1.00	0.95	1.00	
Satd. Flow (prot)		4408			2855		1598	4591	1430	1598	3174	
Flt Permitted		1.00			0.99		0.95	1.00	1.00	0.95	1.00	
Satd. Flow (perm)		4408			2855		1598	4591	1430	1598	3174	
Peak-hour factor, PHF	0.98	0.98	0.98	0.98	0.98	0.98	0.98	0.98	0.98	0.98	0.98	0.98
Adj. Flow (vph)	57	1527	548	12	17	59	126	641	290	169	632	30
RTOR Reduction (vph)	0	63	0	0	59	0	0	0	95	0	4	0
Lane Group Flow (vph)	0	2069	0	0	29	0	126	641	195	169	658	0
Turn Type	Split	NA		Split	NA		Prot	NA	Perm	Prot	NA	
Protected Phases	4	4		3	3		5	2		1	6	
Permitted Phases									2			
Actuated Green, G (s)		40.3			3.6		8.5	18.5	18.5	10.6	20.6	
Effective Green, g (s)		40.3			3.6		8.5	18.5	18.5	10.6	20.6	
Actuated g/C Ratio		0.45			0.04		0.09	0.21	0.21	0.12	0.23	
Clearance Time (s)		4.5			4.5		3.5	4.5	4.5	3.5	4.5	
Vehicle Extension (s)		3.0			5.0		5.0	1.0	1.0	1.0	5.0	
Lane Grp Cap (vph)		1973			114		150	943	293	188	726	
v/s Ratio Prot		c0.47			c0.01		0.08	0.14		c0.11	c0.21	
v/s Ratio Perm									0.14			
v/c Ratio		1.05			0.26		0.84	0.68	0.66	0.90	0.91	
Uniform Delay, d1		24.9			41.9		40.1	33.0	32.9	39.2	33.8	
Progression Factor		1.00			1.00		1.00	1.00	1.00	1.00	1.00	
Incremental Delay, d2		34.4			2.5		34.7	3.9	11.3	43.5	17.1	
Delay (s)		59.3			44.4		74.8	37.0	44.2	82.7	50.9	
Level of Service		E			D		E	D	D	F	D	
Approach Delay (s)		59.3			44.4			43.5			57.3	
Approach LOS		E			D			D			E	

Intersection Summary			
HCM 2000 Control Delay	54.5	HCM 2000 Level of Service	D
HCM 2000 Volume to Capacity ratio	0.96		
Actuated Cycle Length (s)	90.0	Sum of lost time (s)	17.0
Intersection Capacity Utilization	81.7%	ICU Level of Service	D
Analysis Period (min)	15		
c Critical Lane Group			

Forecast Year 2035
With Alternative 1 Conditions

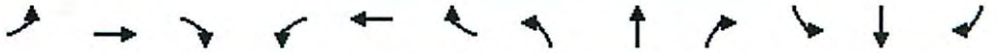
Movement	EBL	EBT	EBR	WBL	WBT	WBR	NBL	NBT	NBR	SBL	SBT	SBR
Lane Configurations												
Volume (vph)	0	0	0	382	1517	266	1134	492	0	0	502	402
Ideal Flow (vphpl)	1850	1850	1850	1850	1850	1850	1850	1850	1850	1850	1850	1850
Total Lost time (s)					4.5	4.5	4.5	4.5			4.5	4.5
Lane Util. Factor					0.91	1.00	0.91	0.91			0.95	1.00
Frt					1.00	0.85	1.00	1.00			1.00	0.85
Flt Protected					0.99	1.00	0.95	0.97			1.00	1.00
Satd. Flow (prot)					4547	1430	1454	2983			3195	1430
Flt Permitted					0.99	1.00	0.95	0.97			1.00	1.00
Satd. Flow (perm)					4547	1430	1454	2983			3195	1430
Peak-hour factor, PHF	0.98	0.98	0.98	0.98	0.98	0.98	0.98	0.98	0.98	0.98	0.98	0.98
Adj. Flow (vph)	0	0	0	390	1548	271	1157	502	0	0	512	410
RTOR Reduction (vph)	0	0	0	0	0	69	0	0	0	0	0	2
Lane Group Flow (vph)	0	0	0	0	1938	202	578	1081	0	0	512	408
Turn Type				Perm	NA	Perm	Split	NA			NA	Perm
Protected Phases					4		1	1			2	
Permitted Phases				4		4						2
Actuated Green, G (s)					30.5	30.5	29.5	29.5			26.5	26.5
Effective Green, g (s)					30.5	30.5	29.5	29.5			26.5	26.5
Actuated g/C Ratio					0.30	0.30	0.29	0.29			0.26	0.26
Clearance Time (s)					4.5	4.5	4.5	4.5			4.5	4.5
Vehicle Extension (s)					4.0	4.0	5.0	5.0			5.0	5.0
Lane Grp Cap (vph)					1386	436	428	879			846	378
v/s Ratio Prot							c0.40	0.36			0.16	
v/s Ratio Perm					0.43	0.14						c0.29
v/c Ratio					1.40	0.46	1.35	1.23			0.61	1.08
Uniform Delay, d1					34.8	28.1	35.2	35.2			32.2	36.8
Progression Factor					1.00	1.00	1.57	1.57			1.00	1.00
Incremental Delay, d2					183.7	1.1	166.0	109.0			1.8	69.0
Delay (s)					218.4	29.2	221.5	164.4			34.0	105.7
Level of Service					F	C	F	F			C	F
Approach Delay (s)		0.0			195.2			184.3			65.9	
Approach LOS		A			F			F			E	

Intersection Summary			
HCM 2000 Control Delay	166.5	HCM 2000 Level of Service	F
HCM 2000 Volume to Capacity ratio	1.28		
Actuated Cycle Length (s)	100.0	Sum of lost time (s)	13.5
Intersection Capacity Utilization	107.1%	ICU Level of Service	G
Analysis Period (min)	15		
c Critical Lane Group			



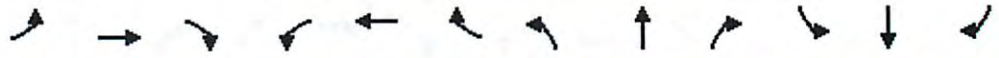
Movement	EBL	EBT	EBR	WBL	WBT	WBR	NBL	NBT	NBR	SBL	SBT	SBR
Lane Configurations												
Volume (vph)	149	824	407	27	0	325	0	1131	255	126	743	0
Ideal Flow (vphpl)	1850	1850	1850	1850	1850	1850	1850	1850	1850	1850	1850	1850
Total Lost time (s)	5.0	5.0	5.0	5.0		4.5		5.0	5.0	4.5	4.5	
Lane Util. Factor	1.00	0.95	1.00	1.00		1.00		0.91	1.00	0.91	0.91	
Frt	1.00	1.00	0.85	1.00		0.85		1.00	0.85	1.00	1.00	
Flt Protected	0.95	1.00	1.00	0.95		1.00		1.00	1.00	0.95	1.00	
Satd. Flow (prot)	1598	3195	1430	1598		1430		4591	1430	1454	3058	
Flt Permitted	0.95	1.00	1.00	0.15		1.00		1.00	1.00	0.95	1.00	
Satd. Flow (perm)	1598	3195	1430	263		1430		4591	1430	1454	3058	
Peak-hour factor, PHF	0.98	0.98	0.98	0.98	0.98	0.98	0.98	0.98	0.98	0.98	0.98	0.98
Adj. Flow (vph)	152	841	415	28	0	332	0	1154	260	129	758	0
RTOR Reduction (vph)	0	0	164	0	0	237	0	0	137	0	0	0
Lane Group Flow (vph)	152	841	251	28	0	95	0	1154	123	116	771	0
Turn Type	Perm	NA	custom	D.Pm		Over		NA	Perm	Split	NA	
Protected Phases		4	2			1		2		1	1	
Permitted Phases	4			4					2			
Actuated Green, G (s)	31.9	31.9	25.0	31.9		28.6		25.0	25.0	28.6	28.6	
Effective Green, g (s)	31.9	31.9	25.0	31.9		28.6		25.0	25.0	28.6	28.6	
Actuated g/C Ratio	0.32	0.32	0.25	0.32		0.29		0.25	0.25	0.29	0.29	
Clearance Time (s)	5.0	5.0	5.0	5.0		4.5		5.0	5.0	4.5	4.5	
Vehicle Extension (s)	4.0	4.0	5.0	4.0		5.0		5.0	5.0	5.0	5.0	
Lane Grp Cap (vph)	509	1019	357	83		408		1147	357	415	874	
v/s Ratio Prot		c0.26	0.18			0.07		c0.25		0.08	c0.25	
v/s Ratio Perm	0.10			0.11					0.09			
v/c Ratio	0.30	0.83	0.70	0.34		0.23		1.01	0.34	0.28	0.88	
Uniform Delay, d1	25.6	31.5	34.1	26.0		27.3		37.5	30.8	27.7	34.1	
Progression Factor	1.00	1.00	1.00	1.00		1.00		1.00	1.00	1.10	1.14	
Incremental Delay, d2	0.5	5.8	11.0	3.3		1.3		28.1	2.6	0.6	4.7	
Delay (s)	26.1	37.3	45.1	29.3		28.6		65.6	33.4	31.0	43.4	
Level of Service	C	D	D	C		C		E	C	C	D	
Approach Delay (s)		38.4			28.7			59.6			41.8	
Approach LOS		D			C			E			D	

Intersection Summary			
HCM 2000 Control Delay	45.7	HCM 2000 Level of Service	D
HCM 2000 Volume to Capacity ratio	0.90		
Actuated Cycle Length (s)	100.0	Sum of lost time (s)	14.5
Intersection Capacity Utilization	79.0%	ICU Level of Service	D
Analysis Period (min)	15		
c Critical Lane Group			



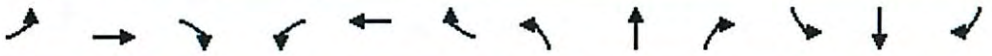
Movement	EBL	EBT	EBR	WBL	WBT	WBR	NBL	NBT	NBR	SBL	SBT	SBR
Lane Configurations												
Volume (vph)	0	0	0	333	1291	52	698	474	0	0	405	122
Ideal Flow (vphpl)	1850	1850	1850	1850	1850	1850	1850	1850	1850	1850	1850	1850
Total Lost time (s)					4.5		4.5	4.5			3.5	
Lane Util. Factor					0.91		0.97	0.95			0.95	
Frt					1.00		1.00	1.00			0.97	
Flt Protected					0.99		0.95	1.00			1.00	
Satd. Flow (prot)					4525		3100	3195			3125	
Flt Permitted					0.99		0.95	1.00			1.00	
Satd. Flow (perm)					4525		3100	3195			3125	
Peak-hour factor, PHF	0.98	0.98	0.98	0.98	0.98	0.98	0.98	0.98	0.98	0.98	0.98	0.98
Adj. Flow (vph)	0	0	0	340	1317	53	712	484	0	0	413	124
RTOR Reduction (vph)	0	0	0	0	4	0	0	0	0	0	13	0
Lane Group Flow (vph)	0	0	0	0	1706	0	712	484	0	0	524	0
Turn Type				Perm	NA		Prot	NA			NA	
Protected Phases					1		2	2 3			3	
Permitted Phases				1								
Actuated Green, G (s)					29.5		19.6	41.5			18.4	
Effective Green, g (s)					29.5		19.6	38.0			18.4	
Actuated g/C Ratio					0.37		0.25	0.48			0.23	
Clearance Time (s)					4.5		4.5				3.5	
Vehicle Extension (s)					5.0		5.0				5.0	
Lane Grp Cap (vph)					1668		759	1517			718	
v/s Ratio Prot							c0.23	0.15			c0.17	
v/s Ratio Perm					0.38							
v/c Ratio					1.02		0.94	0.32			0.73	
Uniform Delay, d1					25.2		29.6	13.0			28.5	
Progression Factor					1.00		1.00	1.00			1.00	
Incremental Delay, d2					27.9		20.6	0.3			4.6	
Delay (s)					53.2		50.2	13.2			33.1	
Level of Service					D		D	B			C	
Approach Delay (s)		0.0			53.2			35.3			33.1	
Approach LOS		A			D			D			C	

Intersection Summary			
HCM 2000 Control Delay	43.8	HCM 2000 Level of Service	D
HCM 2000 Volume to Capacity ratio	0.92		
Actuated Cycle Length (s)	80.0	Sum of lost time (s)	12.5
Intersection Capacity Utilization	80.5%	ICU Level of Service	D
Analysis Period (min)	15		
c Critical Lane Group			



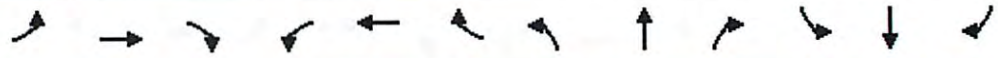
Movement	EBL	EBT	EBR	WBL	WBT	WBR	NBL	NBT	NBR	SBL	SBT	SBR
Lane Configurations												
Volume (vph)	63	899	298	31	80	58	354	1063	202	124	505	45
Ideal Flow (vphpl)	1850	1850	1850	1850	1850	1850	1850	1850	1850	1850	1850	1850
Total Lost time (s)		4.5			4.5		3.5	4.5	4.5	3.5	4.5	
Lane Util. Factor		0.91			0.95		1.00	0.91	1.00	1.00	0.95	
Frt		0.96			0.95		1.00	1.00	0.85	1.00	0.99	
Flt Protected		1.00			0.99		0.95	1.00	1.00	0.95	1.00	
Satd. Flow (prot)		4417			3019		1598	4591	1430	1598	3160	
Flt Permitted		1.00			0.99		0.95	1.00	1.00	0.95	1.00	
Satd. Flow (perm)		4417			3019		1598	4591	1430	1598	3160	
Peak-hour factor, PHF	0.98	0.98	0.98	0.98	0.98	0.98	0.98	0.98	0.98	0.98	0.98	0.98
Adj. Flow (vph)	64	917	304	32	82	59	361	1085	206	127	515	46
RTOR Reduction (vph)	0	62	0	0	56	0	0	0	82	0	8	0
Lane Group Flow (vph)	0	1223	0	0	117	0	361	1085	124	127	553	0
Turn Type	Split	NA		Split	NA		Prot	NA	Perm	Prot	NA	
Protected Phases	4	4		3	3		5	2		1	6	
Permitted Phases									2			
Actuated Green, G (s)		27.5			5.5		18.5	30.5	30.5	9.5	21.5	
Effective Green, g (s)		27.5			5.5		18.5	30.5	30.5	9.5	21.5	
Actuated g/C Ratio		0.31			0.06		0.21	0.34	0.34	0.11	0.24	
Clearance Time (s)		4.5			4.5		3.5	4.5	4.5	3.5	4.5	
Vehicle Extension (s)		3.0			5.0		5.0	1.0	1.0	1.0	5.0	
Lane Grp Cap (vph)		1349			184		328	1555	484	168	754	
v/s Ratio Prot		c0.28			c0.04		c0.23	c0.24		0.08	0.18	
v/s Ratio Perm									0.09			
v/c Ratio		0.91			0.63		1.10	0.70	0.26	0.76	0.73	
Uniform Delay, d1		30.0			41.3		35.8	25.8	21.5	39.1	31.6	
Progression Factor		1.00			1.00		1.00	1.00	1.00	1.00	1.00	
Incremental Delay, d2		9.0			9.5		79.5	2.6	1.3	26.7	6.3	
Delay (s)		39.0			50.8		115.2	28.4	22.8	65.8	37.9	
Level of Service		D			D		F	C	C	E	D	
Approach Delay (s)		39.0			50.8			46.7			43.0	
Approach LOS		D			D			D			D	

Intersection Summary			
HCM 2000 Control Delay	43.6	HCM 2000 Level of Service	D
HCM 2000 Volume to Capacity ratio	0.90		
Actuated Cycle Length (s)	90.0	Sum of lost time (s)	17.0
Intersection Capacity Utilization	81.6%	ICU Level of Service	D
Analysis Period (min)	15		
c Critical Lane Group			



Movement	EBL	EBT	EBR	WBL	WBT	WBR	NBL	NBT	NBR	SBL	SBT	SBR
Lane Configurations					↑↑↑	↱	↰	↰↑↑			↑↑	↱
Volume (vph)	0	0	0	390	1051	397	539	795	0	0	848	121
Ideal Flow (vphpl)	1850	1850	1850	1850	1850	1850	1850	1850	1850	1850	1850	1850
Total Lost time (s)					4.5	4.5	4.5	4.5			4.5	4.5
Lane Util. Factor					0.91	1.00	0.91	0.91			0.95	1.00
Frt					1.00	0.85	1.00	1.00			1.00	0.85
Flt Protected					0.99	1.00	0.95	0.99			1.00	1.00
Satd. Flow (prot)					4537	1430	1454	3045			3195	1430
Flt Permitted					0.99	1.00	0.95	0.99			1.00	1.00
Satd. Flow (perm)					4537	1430	1454	3045			3195	1430
Peak-hour factor, PHF	0.98	0.98	0.98	0.98	0.98	0.98	0.98	0.98	0.98	0.98	0.98	0.98
Adj. Flow (vph)	0	0	0	398	1072	405	550	811	0	0	865	123
RTOR Reduction (vph)	0	0	0	0	0	136	0	0	0	0	0	37
Lane Group Flow (vph)	0	0	0	0	1470	269	440	921	0	0	865	86
Turn Type				Perm	NA	Perm	Split	NA			NA	Perm
Protected Phases					4		1	1			2	
Permitted Phases				4		4						2
Actuated Green, G (s)					28.5	28.5	32.5	32.5			25.5	25.5
Effective Green, g (s)					28.5	28.5	32.5	32.5			25.5	25.5
Actuated g/C Ratio					0.28	0.28	0.32	0.32			0.26	0.26
Clearance Time (s)					4.5	4.5	4.5	4.5			4.5	4.5
Vehicle Extension (s)					4.0	4.0	5.0	5.0			5.0	5.0
Lane Grp Cap (vph)					1293	407	472	989			814	364
v/s Ratio Prot							c0.30	0.30			c0.27	
v/s Ratio Perm					0.32	0.19						0.06
v/c Ratio					1.14	0.66	0.93	0.93			1.06	0.24
Uniform Delay, d1					35.8	31.5	32.7	32.7			37.2	29.5
Progression Factor					1.00	1.00	1.96	1.96			1.00	1.00
Incremental Delay, d2					71.6	4.4	20.6	11.7			49.5	0.7
Delay (s)					107.3	35.9	84.6	75.7			86.8	30.2
Level of Service					F	D	F	E			F	C
Approach Delay (s)		0.0			91.9			78.6			79.8	
Approach LOS		A			F			E			E	

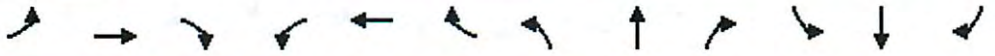
Intersection Summary			
HCM 2000 Control Delay	84.8	HCM 2000 Level of Service	F
HCM 2000 Volume to Capacity ratio	1.04		
Actuated Cycle Length (s)	100.0	Sum of lost time (s)	13.5
Intersection Capacity Utilization	90.1%	ICU Level of Service	E
Analysis Period (min)	15		
c Critical Lane Group			



Movement	EBL	EBT	EBR	WBL	WBT	WBR	NBL	NBT	NBR	SBL	SBT	SBR
Lane Configurations												
Volume (vph)	162	1509	811	12	0	44	0	1122	320	405	839	0
Ideal Flow (vphpl)	1850	1850	1850	1850	1850	1850	1850	1850	1850	1850	1850	1850
Total Lost time (s)	5.0	5.0	5.0	5.0		4.5		5.0	5.0	4.5	4.5	
Lane Util. Factor	1.00	0.95	1.00	1.00		1.00		0.91	1.00	0.91	0.91	
Frt	1.00	1.00	0.85	1.00		0.85		1.00	0.85	1.00	1.00	
Flt Protected	0.95	1.00	1.00	0.95		1.00		1.00	1.00	0.95	1.00	
Satd. Flow (prot)	1598	3195	1430	1598		1430		4591	1430	1454	3054	
Flt Permitted	0.95	1.00	1.00	0.11		1.00		1.00	1.00	0.95	1.00	
Satd. Flow (perm)	1598	3195	1430	192		1430		4591	1430	1454	3054	
Peak-hour factor, PHF	0.98	0.98	0.98	0.98	0.98	0.98	0.98	0.98	0.98	0.98	0.98	0.98
Adj. Flow (vph)	165	1540	828	12	0	45	0	1145	327	413	856	0
RTOR Reduction (vph)	0	0	180	0	0	36	0	0	20	0	0	0
Lane Group Flow (vph)	165	1540	648	12	0	9	0	1145	307	372	897	0
Turn Type	Perm	NA	custom	D.Pm		Over		NA	Perm	Split	NA	
Protected Phases		4	2			1		2		1	1	
Permitted Phases	4			4					2			
Actuated Green, G (s)	35.0	35.0	30.0	35.0		20.5		30.0	30.0	20.5	20.5	
Effective Green, g (s)	35.0	35.0	30.0	35.0		20.5		30.0	30.0	20.5	20.5	
Actuated g/C Ratio	0.35	0.35	0.30	0.35		0.20		0.30	0.30	0.20	0.20	
Clearance Time (s)	5.0	5.0	5.0	5.0		4.5		5.0	5.0	4.5	4.5	
Vehicle Extension (s)	4.0	4.0	5.0	4.0		5.0		5.0	5.0	5.0	5.0	
Lane Grp Cap (vph)	559	1118	429	67		293		1377	429	298	626	
v/s Ratio Prot		c0.48	c0.45			0.01		0.25		0.26	c0.29	
v/s Ratio Perm	0.10			0.06					0.21			
v/c Ratio	0.30	1.38	1.51	0.18		0.03		0.83	0.71	1.25	1.43	
Uniform Delay, d1	23.6	32.5	35.0	22.5		31.8		32.6	31.2	39.8	39.8	
Progression Factor	1.00	1.00	1.00	1.00		1.00		1.00	1.00	1.11	1.11	
Incremental Delay, d2	0.4	175.5	241.6	1.8		0.2		6.0	9.8	114.4	195.7	
Delay (s)	24.0	208.0	276.6	24.3		32.0		38.6	41.0	158.5	239.7	
Level of Service	C	F	F	C		C		D	D	F	F	
Approach Delay (s)		218.5			30.4			39.1			215.9	
Approach LOS		F			C			D			F	

Intersection Summary			
HCM 2000 Control Delay	166.3	HCM 2000 Level of Service	F
HCM 2000 Volume to Capacity ratio	1.44		
Actuated Cycle Length (s)	100.0	Sum of lost time (s)	14.5
Intersection Capacity Utilization	101.1%	ICU Level of Service	G
Analysis Period (min)	15		

c Critical Lane Group



Movement	EBL	EBT	EBR	WBL	WBT	WBR	NBL	NBT	NBR	SBL	SBT	SBR
Lane Configurations												
Volume (vph)	0	0	0	399	1350	79	452	333	0	0	387	41
Ideal Flow (vphpl)	1850	1850	1850	1850	1850	1850	1850	1850	1850	1850	1850	1850
Total Lost time (s)					4.5		4.5	4.5			3.5	
Lane Util. Factor					0.91		0.97	0.95			0.95	
Frt					0.99		1.00	1.00			0.99	
Flt Protected					0.99		0.95	1.00			1.00	
Satd. Flow (prot)					4512		3100	3195			3164	
Flt Permitted					0.99		0.95	1.00			1.00	
Satd. Flow (perm)					4512		3100	3195			3164	
Peak-hour factor, PHF	0.98	0.98	0.98	0.98	0.98	0.98	0.98	0.98	0.98	0.98	0.98	0.98
Adj. Flow (vph)	0	0	0	407	1378	81	461	340	0	0	395	42
RTOR Reduction (vph)	0	0	0	0	6	0	0	0	0	0	6	0
Lane Group Flow (vph)	0	0	0	0	1860	0	461	340	0	0	431	0
Turn Type				Perm	NA		Prot	NA			NA	
Protected Phases					1		2	2 3			3	
Permitted Phases				1								
Actuated Green, G (s)					31.6		17.5	40.4			18.4	
Effective Green, g (s)					31.6		17.5	40.4			18.4	
Actuated g/C Ratio					0.40		0.22	0.50			0.23	
Clearance Time (s)					4.5		4.5				3.5	
Vehicle Extension (s)					5.0		5.0				5.0	
Lane Grp Cap (vph)					1782		678	1613			727	
v/s Ratio Prot							c0.15	0.11			c0.14	
v/s Ratio Perm					0.41							
v/c Ratio					1.04		0.68	0.21			0.59	
Uniform Delay, d1					24.2		28.7	11.0			27.5	
Progression Factor					1.00		1.00	1.00			1.00	
Incremental Delay, d2					33.7		5.4	0.1			2.0	
Delay (s)					57.9		34.1	11.1			29.4	
Level of Service					E		C	B			C	
Approach Delay (s)		0.0			57.9			24.3			29.4	
Approach LOS		A			E			C			C	

Intersection Summary			
HCM 2000 Control Delay	45.3	HCM 2000 Level of Service	D
HCM 2000 Volume to Capacity ratio	0.83		
Actuated Cycle Length (s)	80.0	Sum of lost time (s)	12.5
Intersection Capacity Utilization	73.3%	ICU Level of Service	D
Analysis Period (min)	15		
c Critical Lane Group			

Movement	EBL	EBT	EBR	WBL	WBT	WBR	NBL	NBT	NBR	SBL	SBT	SBR
Lane Configurations												
Volume (vph)	69	1495	549	12	14	58	123	630	281	167	611	29
Ideal Flow (vphpl)	1850	1850	1850	1850	1850	1850	1850	1850	1850	1850	1850	1850
Total Lost time (s)		4.5			4.5		3.5	4.5	4.5	3.5	4.5	
Lane Util. Factor		0.91			0.95		1.00	0.91	1.00	1.00	0.95	
Frt		0.96			0.90		1.00	1.00	0.85	1.00	0.99	
Flt Protected		1.00			0.99		0.95	1.00	1.00	0.95	1.00	
Satd. Flow (prot)		4408			2855		1598	4591	1430	1598	3174	
Flt Permitted		1.00			0.99		0.95	1.00	1.00	0.95	1.00	
Satd. Flow (perm)		4408			2855		1598	4591	1430	1598	3174	
Peak-hour factor, PHF	0.98	0.98	0.98	0.98	0.98	0.98	0.98	0.98	0.98	0.98	0.98	0.98
Adj. Flow (vph)	70	1526	560	12	14	59	126	643	287	170	623	30
RTOR Reduction (vph)	0	63	0	0	59	0	0	0	95	0	4	0
Lane Group Flow (vph)	0	2093	0	0	26	0	126	643	192	170	649	0
Turn Type	Split	NA		Split	NA		Prot	NA	Perm	Prot	NA	
Protected Phases	4	4		3	3		5	2		1	6	
Permitted Phases									2			
Actuated Green, G (s)		40.3			3.6		8.5	18.5	18.5	10.6	20.6	
Effective Green, g (s)		40.3			3.6		8.5	18.5	18.5	10.6	20.6	
Actuated g/C Ratio		0.45			0.04		0.09	0.21	0.21	0.12	0.23	
Clearance Time (s)		4.5			4.5		3.5	4.5	4.5	3.5	4.5	
Vehicle Extension (s)		3.0			5.0		5.0	1.0	1.0	1.0	5.0	
Lane Grp Cap (vph)		1973			114		150	943	293	188	726	
v/s Ratio Prot		c0.47			c0.01		0.08	0.14		c0.11	c0.20	
v/s Ratio Perm									0.13			
v/c Ratio		1.06			0.23		0.84	0.68	0.65	0.90	0.89	
Uniform Delay, d1		24.9			41.9		40.1	33.0	32.8	39.2	33.6	
Progression Factor		1.00			1.00		1.00	1.00	1.00	1.00	1.00	
Incremental Delay, d2		38.6			2.2		34.7	4.0	10.9	44.5	15.7	
Delay (s)		63.5			44.0		74.8	37.0	43.7	83.7	49.4	
Level of Service		E			D		E	D	D	F	D	
Approach Delay (s)		63.5			44.0			43.3			56.5	
Approach LOS		E			D			D			E	

Intersection Summary			
HCM 2000 Control Delay	56.5	HCM 2000 Level of Service	E
HCM 2000 Volume to Capacity ratio	0.97		
Actuated Cycle Length (s)	90.0	Sum of lost time (s)	17.0
Intersection Capacity Utilization	82.0%	ICU Level of Service	E
Analysis Period (min)	15		
c Critical Lane Group			

Movement	EBL	EBT	EBR	WBL	WBT	WBR	NBL	NBT	NBR	SBL	SBT	SBR
Lane Configurations												
Volume (vph)	0	0	0	390	1051	397	539	795	0	0	848	121
Ideal Flow (vphpl)	1850	1850	1850	1850	1850	1850	1850	1850	1850	1850	1850	1850
Total Lost time (s)					4.5	4.5	4.5	4.5			4.5	4.5
Lane Util. Factor					0.91	1.00	0.91	0.91			0.95	1.00
Frt					1.00	0.85	1.00	1.00			1.00	0.85
Flt Protected					0.99	1.00	0.95	0.99			1.00	1.00
Satd. Flow (prot)					4537	1430	1454	3045			3195	1430
Flt Permitted					0.99	1.00	0.95	0.99			1.00	1.00
Satd. Flow (perm)					4537	1430	1454	3045			3195	1430
Peak-hour factor, PHF	0.98	0.98	0.98	0.98	0.98	0.98	0.98	0.98	0.98	0.98	0.98	0.98
Adj. Flow (vph)	0	0	0	398	1072	405	550	811	0	0	865	123
RTOR Reduction (vph)	0	0	0	0	0	136	0	0	0	0	0	37
Lane Group Flow (vph)	0	0	0	0	1470	269	440	921	0	0	865	86
Turn Type				Perm	NA	Perm	Split	NA			NA	Perm
Protected Phases					4		1	1			2	
Permitted Phases				4		4						2
Actuated Green, G (s)					30.5	30.5	30.5	30.5			25.5	25.5
Effective Green, g (s)					30.5	30.5	30.5	30.5			25.5	25.5
Actuated g/C Ratio					0.30	0.30	0.30	0.30			0.26	0.26
Clearance Time (s)					4.5	4.5	4.5	4.5			4.5	4.5
Vehicle Extension (s)					4.0	4.0	5.0	5.0			5.0	5.0
Lane Grp Cap (vph)					1383	436	443	928			814	364
v/s Ratio Prot							c0.30	0.30			c0.27	
v/s Ratio Perm					0.32	0.19						0.06
v/c Ratio					1.06	0.62	0.99	0.99			1.06	0.24
Uniform Delay, d1					34.8	29.8	34.6	34.6			37.2	29.5
Progression Factor					1.00	1.00	1.81	1.81			1.00	1.00
Incremental Delay, d2					42.8	3.0	30.1	20.2			49.5	0.7
Delay (s)					77.6	32.7	93.0	82.9			86.8	30.2
Level of Service					E	C	F	F			F	C
Approach Delay (s)		0.0			67.9			86.2			79.8	
Approach LOS		A			E			F			E	

Intersection Summary			
HCM 2000 Control Delay	76.6	HCM 2000 Level of Service	E
HCM 2000 Volume to Capacity ratio	1.04		
Actuated Cycle Length (s)	100.0	Sum of lost time (s)	13.5
Intersection Capacity Utilization	90.1%	ICU Level of Service	E
Analysis Period (min)	15		
c Critical Lane Group			

Movement	EBL	EBT	EBR	WBL	WBT	WBR	NBL	NBT	NBR	SBL	SBT	SBR
Lane Configurations												
Volume (vph)	162	1509	811	12	0	44	0	1122	320	405	839	0
Ideal Flow (vphpl)	1850	1850	1850	1850	1850	1850	1850	1850	1850	1850	1850	1850
Total Lost time (s)	5.0	5.0	5.0	5.0		4.5		5.0	5.0	4.5	4.5	
Lane Util. Factor	1.00	0.95	1.00	1.00		1.00		0.91	1.00	0.91	0.91	
Frt	1.00	1.00	0.85	1.00		0.85		1.00	0.85	1.00	1.00	
Flt Protected	0.95	1.00	1.00	0.95		1.00		1.00	1.00	0.95	1.00	
Satd. Flow (prot)	1598	3195	1430	1598		1430		4591	1430	1454	3054	
Flt Permitted	0.95	1.00	1.00	0.12		1.00		1.00	1.00	0.95	1.00	
Satd. Flow (perm)	1598	3195	1430	192		1430		4591	1430	1454	3054	
Peak-hour factor, PHF	0.98	0.98	0.98	0.98	0.98	0.98	0.98	0.98	0.98	0.98	0.98	0.98
Adj. Flow (vph)	165	1540	828	12	0	45	0	1145	327	413	856	0
RTOR Reduction (vph)	0	0	188	0	0	34	0	0	21	0	0	0
Lane Group Flow (vph)	165	1540	640	12	0	11	0	1145	306	372	897	0
Turn Type	Perm	NA	custom	D.Pm		Over		NA	Perm	Split	NA	
Protected Phases		4	2			1		2		1	1	
Permitted Phases	4			4					2			
Actuated Green, G (s)	34.0	34.0	27.0	34.0		24.5		27.0	27.0	24.5	24.5	
Effective Green, g (s)	34.0	34.0	27.0	34.0		24.5		27.0	27.0	24.5	24.5	
Actuated g/C Ratio	0.34	0.34	0.27	0.34		0.24		0.27	0.27	0.24	0.24	
Clearance Time (s)	5.0	5.0	5.0	5.0		4.5		5.0	5.0	4.5	4.5	
Vehicle Extension (s)	4.0	4.0	5.0	4.0		5.0		5.0	5.0	5.0	5.0	
Lane Grp Cap (vph)	543	1086	386	65		350		1239	386	356	748	
v/s Ratio Prot		c0.48	c0.45			0.01		0.25		0.26	c0.29	
v/s Ratio Perm	0.10			0.06					0.21			
v/c Ratio	0.30	1.42	1.66	0.18		0.03		0.92	0.79	1.04	1.20	
Uniform Delay, d1	24.3	33.0	36.5	23.2		28.7		35.5	33.9	37.8	37.8	
Progression Factor	1.00	1.00	1.00	1.00		1.00		1.00	1.00	1.27	1.27	
Incremental Delay, d2	0.4	193.6	307.9	1.9		0.2		12.9	15.3	27.9	90.9	
Delay (s)	24.7	226.6	344.4	25.1		28.9		48.4	49.2	75.7	138.7	
Level of Service	C	F	F	C		C		D	D	E	F	
Approach Delay (s)		251.9			28.1			48.5			120.3	
Approach LOS		F			C			D			F	

Intersection Summary			
HCM 2000 Control Delay	162.0	HCM 2000 Level of Service	F
HCM 2000 Volume to Capacity ratio	1.43		
Actuated Cycle Length (s)	100.0	Sum of lost time (s)	14.5
Intersection Capacity Utilization	101.1%	ICU Level of Service	G
Analysis Period (min)	15		
c Critical Lane Group			

Movement	EBL	EBT	EBR	WBL	WBT	WBR	NBL	NBT	NBR	SBL	SBT	SBR
Lane Configurations												
Volume (vph)	69	1495	549	12	14	58	123	630	281	167	611	29
Ideal Flow (vphpl)	1850	1850	1850	1850	1850	1850	1850	1850	1850	1850	1850	1850
Total Lost time (s)		4.5			4.5		3.5	4.5	4.5	3.5	4.5	
Lane Util. Factor		0.91			0.95		1.00	0.91	1.00	1.00	0.95	
Frt		0.96			0.90		1.00	1.00	0.85	1.00	0.99	
Flt Protected		1.00			0.99		0.95	1.00	1.00	0.95	1.00	
Satd. Flow (prot)		4408			2855		1598	4591	1430	1598	3174	
Flt Permitted		1.00			0.99		0.95	1.00	1.00	0.95	1.00	
Satd. Flow (perm)		4408			2855		1598	4591	1430	1598	3174	
Peak-hour factor, PHF	0.98	0.98	0.98	0.98	0.98	0.98	0.98	0.98	0.98	0.98	0.98	0.98
Adj. Flow (vph)	70	1526	560	12	14	59	126	643	287	170	623	30
RTOR Reduction (vph)	0	60	0	0	60	0	0	0	98	0	4	0
Lane Group Flow (vph)	0	2096	0	0	25	0	126	643	189	170	649	0
Turn Type	Split	NA		Split	NA		Prot	NA	Perm	Prot	NA	
Protected Phases	4	4		3	3		5	2		1	6	
Permitted Phases									2			
Actuated Green, G (s)		42.9			2.2		8.1	16.3	16.3	11.6	19.8	
Effective Green, g (s)		42.9			2.2		8.1	16.3	16.3	11.6	19.8	
Actuated g/C Ratio		0.48			0.02		0.09	0.18	0.18	0.13	0.22	
Clearance Time (s)		4.5			4.5		3.5	4.5	4.5	3.5	4.5	
Vehicle Extension (s)		3.0			5.0		5.0	1.0	1.0	1.0	5.0	
Lane Grp Cap (vph)		2101			69		143	831	258	205	698	
v/s Ratio Prot		c0.48			c0.01		0.08	0.14		c0.11	c0.20	
v/s Ratio Perm									0.13			
v/c Ratio		1.00			0.37		0.88	0.77	0.73	0.83	0.93	
Uniform Delay, d1		23.5			43.2		40.5	35.1	34.8	38.2	34.4	
Progression Factor		1.00			1.00		1.00	1.00	1.00	1.00	1.00	
Incremental Delay, d2		19.0			6.9		44.6	6.9	16.7	30.5	20.7	
Delay (s)		42.5			50.1		85.1	42.0	51.5	68.8	55.1	
Level of Service		D			D		F	D	D	E	E	
Approach Delay (s)		42.5			50.1			49.7			57.9	
Approach LOS		D			D			D			E	

Intersection Summary			
HCM 2000 Control Delay	47.6	HCM 2000 Level of Service	D
HCM 2000 Volume to Capacity ratio	0.95		
Actuated Cycle Length (s)	90.0	Sum of lost time (s)	17.0
Intersection Capacity Utilization	82.0%	ICU Level of Service	E
Analysis Period (min)	15		
c Critical Lane Group			

Forecast Year 2035
With Alternative 2 Conditions

Movement	EBL	EBT	EBR	WBL	WBT	WBR	NBL	NBT	NBR	SBL	SBT	SBR
Lane Configurations												
Volume (vph)	0	0	0	369	1514	265	1136	499	0	0	527	402
Ideal Flow (vphpl)	1850	1850	1850	1850	1850	1850	1850	1850	1850	1850	1850	1850
Total Lost time (s)					4.5	4.5	4.5	4.5			4.5	4.5
Lane Util. Factor					0.91	1.00	0.91	0.91			0.95	1.00
Frt					1.00	0.85	1.00	1.00			1.00	0.85
Flt Protected					0.99	1.00	0.95	0.97			1.00	1.00
Satd. Flow (prot)					4547	1430	1454	2983			3195	1430
Flt Permitted					0.99	1.00	0.95	0.97			1.00	1.00
Satd. Flow (perm)					4547	1430	1454	2983			3195	1430
Peak-hour factor, PHF	0.98	0.98	0.98	0.98	0.98	0.98	0.98	0.98	0.98	0.98	0.98	0.98
Adj. Flow (vph)	0	0	0	377	1545	270	1159	509	0	0	538	410
RTOR Reduction (vph)	0	0	0	0	0	69	0	0	0	0	0	2
Lane Group Flow (vph)	0	0	0	0	1922	201	579	1089	0	0	538	408
Turn Type				Perm	NA	Perm	Split	NA			NA	Perm
Protected Phases					4		1	1			2	
Permitted Phases				4		4						2
Actuated Green, G (s)					30.5	30.5	29.5	29.5			26.5	26.5
Effective Green, g (s)					30.5	30.5	29.5	29.5			26.5	26.5
Actuated g/C Ratio					0.30	0.30	0.29	0.29			0.26	0.26
Clearance Time (s)					4.5	4.5	4.5	4.5			4.5	4.5
Vehicle Extension (s)					4.0	4.0	5.0	5.0			5.0	5.0
Lane Grp Cap (vph)					1386	436	428	879			846	378
v/s Ratio Prot							c0.40	0.37			0.17	
v/s Ratio Perm					0.42	0.14						c0.29
v/c Ratio					1.39	0.46	1.35	1.24			0.64	1.08
Uniform Delay, d1					34.8	28.1	35.2	35.2			32.5	36.8
Progression Factor					1.00	1.00	1.57	1.57			1.00	1.00
Incremental Delay, d2					178.6	1.1	167.0	113.0			2.2	69.0
Delay (s)					213.3	29.2	222.3	168.2			34.7	105.7
Level of Service					F	C	F	F			C	F
Approach Delay (s)		0.0			190.6			187.0			65.4	
Approach LOS		A			F			F			E	

Intersection Summary			
HCM 2000 Control Delay	164.7	HCM 2000 Level of Service	F
HCM 2000 Volume to Capacity ratio	1.28		
Actuated Cycle Length (s)	100.0	Sum of lost time (s)	13.5
Intersection Capacity Utilization	106.9%	ICU Level of Service	G
Analysis Period (min)	15		
c Critical Lane Group			

Movement	EBL	EBT	EBR	WBL	WBT	WBR	NBL	NBT	NBR	SBL	SBT	SBR
Lane Configurations												
Volume (vph)	149	820	407	34	0	334	0	1131	259	150	730	0
Ideal Flow (vphpl)	1850	1850	1850	1850	1850	1850	1850	1850	1850	1850	1850	1850
Total Lost time (s)	5.0	5.0	5.0	5.0		4.5		5.0	5.0	4.5	4.5	
Lane Util. Factor	1.00	0.95	1.00	1.00		1.00		0.91	1.00	0.91	0.91	
Frt	1.00	1.00	0.85	1.00		0.85		1.00	0.85	1.00	1.00	
Flt Protected	0.95	1.00	1.00	0.95		1.00		1.00	1.00	0.95	1.00	
Satd. Flow (prot)	1598	3195	1430	1598		1430		4591	1430	1454	3058	
Flt Permitted	0.95	1.00	1.00	0.16		1.00		1.00	1.00	0.95	1.00	
Satd. Flow (perm)	1598	3195	1430	263		1430		4591	1430	1454	3058	
Peak-hour factor, PHF	0.98	0.98	0.98	0.98	0.98	0.98	0.98	0.98	0.98	0.98	0.98	0.98
Adj. Flow (vph)	152	837	415	35	0	341	0	1154	264	153	745	0
RTOR Reduction (vph)	0	0	164	0	0	243	0	0	137	0	0	0
Lane Group Flow (vph)	152	837	251	35	0	98	0	1154	127	138	760	0
Turn Type	Perm	NA	custom	D.Pm		Over		NA	Perm	Split	NA	
Protected Phases		4	2			1		2		1	1	
Permitted Phases	4			4					2			
Actuated Green, G (s)	31.9	31.9	25.0	31.9		28.6		25.0	25.0	28.6	28.6	
Effective Green, g (s)	31.9	31.9	25.0	31.9		28.6		25.0	25.0	28.6	28.6	
Actuated g/C Ratio	0.32	0.32	0.25	0.32		0.29		0.25	0.25	0.29	0.29	
Clearance Time (s)	5.0	5.0	5.0	5.0		4.5		5.0	5.0	4.5	4.5	
Vehicle Extension (s)	4.0	4.0	5.0	4.0		5.0		5.0	5.0	5.0	5.0	
Lane Grp Cap (vph)	509	1019	357	83		408		1147	357	415	874	
v/s Ratio Prot		c0.26	0.18			0.07		c0.25		0.09	c0.25	
v/s Ratio Perm	0.10			0.13					0.09			
v/c Ratio	0.30	0.82	0.70	0.42		0.24		1.01	0.36	0.33	0.87	
Uniform Delay, d1	25.6	31.4	34.1	26.8		27.4		37.5	30.9	28.2	33.9	
Progression Factor	1.00	1.00	1.00	1.00		1.00		1.00	1.00	1.08	1.11	
Incremental Delay, d2	0.5	5.7	11.0	4.7		1.4		28.1	2.7	0.7	4.3	
Delay (s)	26.1	37.1	45.1	31.5		28.7		65.6	33.6	31.1	42.1	
Level of Service	C	D	D	C		C		E	C	C	D	
Approach Delay (s)		38.3			29.0			59.6			40.4	
Approach LOS		D			C			E			D	

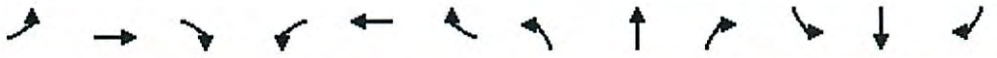
Intersection Summary			
HCM 2000 Control Delay	45.3	HCM 2000 Level of Service	D
HCM 2000 Volume to Capacity ratio	0.89		
Actuated Cycle Length (s)	100.0	Sum of lost time (s)	14.5
Intersection Capacity Utilization	83.4%	ICU Level of Service	E
Analysis Period (min)	15		
c Critical Lane Group			

Movement	EBL	EBT	EBR	WBL	WBT	WBR	NBL	NBT	NBR	SBL	SBT	SBR
Lane Configurations												
Volume (vph)	0	0	0	333	1295	52	626	474	0	0	405	119
Ideal Flow (vphpl)	1850	1850	1850	1850	1850	1850	1850	1850	1850	1850	1850	1850
Total Lost time (s)					4.5		4.5	4.5			3.5	
Lane Util. Factor					0.91		0.97	0.95			0.95	
Frt					1.00		1.00	1.00			0.97	
Flt Protected					0.99		0.95	1.00			1.00	
Satd. Flow (prot)					4525		3100	3195			3125	
Flt Permitted					0.99		0.95	1.00			1.00	
Satd. Flow (perm)					4525		3100	3195			3125	
Peak-hour factor, PHF	0.98	0.98	0.98	0.98	0.98	0.98	0.98	0.98	0.98	0.98	0.98	0.98
Adj. Flow (vph)	0	0	0	340	1321	53	639	484	0	0	413	121
RTOR Reduction (vph)	0	0	0	0	4	0	0	0	0	0	13	0
Lane Group Flow (vph)	0	0	0	0	1710	0	639	484	0	0	521	0
Turn Type				Perm	NA		Prot	NA			NA	
Protected Phases					1		2	2 3			3	
Permitted Phases				1								
Actuated Green, G (s)					29.5		19.6	41.5			18.4	
Effective Green, g (s)					29.5		19.6	38.0			18.4	
Actuated g/C Ratio					0.37		0.25	0.48			0.23	
Clearance Time (s)					4.5		4.5				3.5	
Vehicle Extension (s)					5.0		5.0				5.0	
Lane Grp Cap (vph)					1668		759	1517			718	
v/s Ratio Prot							c0.21	0.15			c0.17	
v/s Ratio Perm					0.38							
v/c Ratio					1.02		0.84	0.32			0.73	
Uniform Delay, d1					25.2		28.7	13.0			28.5	
Progression Factor					1.00		1.00	1.00			1.00	
Incremental Delay, d2					28.6		10.9	0.3			4.5	
Delay (s)					53.9		39.7	13.2			32.9	
Level of Service					D		D	B			C	
Approach Delay (s)		0.0			53.9			28.3			32.9	
Approach LOS		A			D			C			C	

Intersection Summary			
HCM 2000 Control Delay	42.0	HCM 2000 Level of Service	D
HCM 2000 Volume to Capacity ratio	0.89		
Actuated Cycle Length (s)	80.0	Sum of lost time (s)	12.5
Intersection Capacity Utilization	78.4%	ICU Level of Service	D
Analysis Period (min)	15		
c Critical Lane Group			

Movement	EBL	EBT	EBR	WBL	WBT	WBR	NBL	NBT	NBR	SBL	SBT	SBR
Lane Configurations												
Volume (vph)	27	902	297	31	87	58	357	1027	202	124	505	45
Ideal Flow (vphpl)	1850	1850	1850	1850	1850	1850	1850	1850	1850	1850	1850	1850
Total Lost time (s)		4.5			4.5		3.5	4.5	4.5	3.5	4.5	
Lane Util. Factor		0.91			0.95		1.00	0.91	1.00	1.00	0.95	
Frt		0.96			0.95		1.00	1.00	0.85	1.00	0.99	
Flt Protected		1.00			0.99		0.95	1.00	1.00	0.95	1.00	
Satd. Flow (prot)		4417			3019		1598	4591	1430	1598	3160	
Flt Permitted		1.00			0.99		0.95	1.00	1.00	0.95	1.00	
Satd. Flow (perm)		4417			3019		1598	4591	1430	1598	3160	
Peak-hour factor, PHF	0.98	0.98	0.98	0.98	0.98	0.98	0.98	0.98	0.98	0.98	0.98	0.98
Adj. Flow (vph)	28	920	303	32	89	59	364	1048	206	127	515	46
RTOR Reduction (vph)	0	64	0	0	56	0	0	0	82	0	8	0
Lane Group Flow (vph)	0	1187	0	0	124	0	364	1048	124	127	553	0
Turn Type	Split	NA		Split	NA		Prot	NA	Perm	Prot	NA	
Protected Phases	4	4		3	3		5	2		1	6	
Permitted Phases									2			
Actuated Green, G (s)		27.4			5.5		18.6	30.5	30.5	9.6	21.5	
Effective Green, g (s)		27.4			5.5		18.6	30.5	30.5	9.6	21.5	
Actuated g/C Ratio		0.30			0.06		0.21	0.34	0.34	0.11	0.24	
Clearance Time (s)		4.5			4.5		3.5	4.5	4.5	3.5	4.5	
Vehicle Extension (s)		3.0			5.0		5.0	1.0	1.0	1.0	5.0	
Lane Grp Cap (vph)		1344			184		330	1555	484	170	754	
v/s Ratio Prot		c0.27			c0.04		c0.23	c0.23		0.08	0.18	
v/s Ratio Perm									0.09			
v/c Ratio		0.88			0.67		1.10	0.67	0.26	0.75	0.73	
Uniform Delay, d1		29.8			41.4		35.7	25.5	21.5	39.0	31.6	
Progression Factor		1.00			1.00		1.00	1.00	1.00	1.00	1.00	
Incremental Delay, d2		7.2			11.9		80.1	2.4	1.3	25.5	6.3	
Delay (s)		37.0			53.3		115.8	27.8	22.8	64.6	37.9	
Level of Service		D			D		F	C	C	E	D	
Approach Delay (s)		37.0			53.3			47.0			42.8	
Approach LOS		D			D			D			D	

Intersection Summary			
HCM 2000 Control Delay	43.2	HCM 2000 Level of Service	D
HCM 2000 Volume to Capacity ratio	0.88		
Actuated Cycle Length (s)	90.0	Sum of lost time (s)	17.0
Intersection Capacity Utilization	81.3%	ICU Level of Service	D
Analysis Period (min)	15		
c Critical Lane Group			



Movement	EBL	EBT	EBR	WBL	WBT	WBR	NBL	NBT	NBR	SBL	SBT	SBR
Lane Configurations					↑↑↑	↱	↰	↰↑↑			↑↑	↱
Volume (vph)	0	0	0	336	1036	394	550	820	0	0	855	121
Ideal Flow (vphpl)	1850	1850	1850	1850	1850	1850	1850	1850	1850	1850	1850	1850
Total Lost time (s)					4.5	4.5	4.5	4.5			4.5	4.5
Lane Util. Factor					0.91	1.00	0.91	0.91			0.95	1.00
Frt					1.00	0.85	1.00	1.00			1.00	0.85
Flt Protected					0.99	1.00	0.95	0.99			1.00	1.00
Satd. Flow (prot)					4537	1430	1454	3045			3195	1430
Flt Permitted					0.99	1.00	0.95	0.99			1.00	1.00
Satd. Flow (perm)					4537	1430	1454	3045			3195	1430
Peak-hour factor, PHF	0.98	0.98	0.98	0.98	0.98	0.98	0.98	0.98	0.98	0.98	0.98	0.98
Adj. Flow (vph)	0	0	0	343	1057	402	561	837	0	0	872	123
RTOR Reduction (vph)	0	0	0	0	0	141	0	0	0	0	0	37
Lane Group Flow (vph)	0	0	0	0	1400	261	454	944	0	0	872	86
Turn Type				Perm	NA	Perm	Split	NA			NA	Perm
Protected Phases					4		1	1			2	
Permitted Phases				4		4						2
Actuated Green, G (s)					28.5	28.5	32.5	32.5			25.5	25.5
Effective Green, g (s)					28.5	28.5	32.5	32.5			25.5	25.5
Actuated g/C Ratio					0.28	0.28	0.32	0.32			0.26	0.26
Clearance Time (s)					4.5	4.5	4.5	4.5			4.5	4.5
Vehicle Extension (s)					4.0	4.0	5.0	5.0			5.0	5.0
Lane Grp Cap (vph)					1293	407	472	989			814	364
v/s Ratio Prot							c0.31	0.31			c0.27	
v/s Ratio Perm					0.31	0.18						0.06
v/c Ratio					1.08	0.64	0.96	0.95			1.07	0.24
Uniform Delay, d1					35.8	31.3	33.1	33.0			37.2	29.5
Progression Factor					1.00	1.00	1.93	1.93			1.00	1.00
Incremental Delay, d2					50.6	3.8	25.9	14.9			52.4	0.7
Delay (s)					86.4	35.1	89.9	78.6			89.7	30.2
Level of Service					F	D	F	E			F	C
Approach Delay (s)		0.0			74.9			82.3			82.3	
Approach LOS		A			E			F			F	

Intersection Summary			
HCM 2000 Control Delay	79.1	HCM 2000 Level of Service	E
HCM 2000 Volume to Capacity ratio	1.03		
Actuated Cycle Length (s)	100.0	Sum of lost time (s)	13.5
Intersection Capacity Utilization	89.5%	ICU Level of Service	E
Analysis Period (min)	15		
c Critical Lane Group			

Movement	EBL	EBT	EBR	WBL	WBT	WBR	NBL	NBT	NBR	SBL	SBT	SBR
Lane Configurations												
Volume (vph)	162	1508	811	37	0	80	0	1122	321	408	789	0
Ideal Flow (vphpl)	1850	1850	1850	1850	1850	1850	1850	1850	1850	1850	1850	1850
Total Lost time (s)	5.0	5.0	5.0	5.0		4.5		5.0	5.0	4.5	4.5	
Lane Util. Factor	1.00	0.95	1.00	1.00		1.00		0.91	1.00	0.91	0.91	
Frt	1.00	1.00	0.85	1.00		0.85		1.00	0.85	1.00	1.00	
Flt Protected	0.95	1.00	1.00	0.95		1.00		1.00	1.00	0.95	1.00	
Satd. Flow (prot)	1598	3195	1430	1598		1430		4591	1430	1454	3054	
Flt Permitted	0.95	1.00	1.00	0.11		1.00		1.00	1.00	0.95	1.00	
Satd. Flow (perm)	1598	3195	1430	192		1430		4591	1430	1454	3054	
Peak-hour factor, PHF	0.98	0.98	0.98	0.98	0.98	0.98	0.98	0.98	0.98	0.98	0.98	0.98
Adj. Flow (vph)	165	1539	828	38	0	82	0	1145	328	416	805	0
RTOR Reduction (vph)	0	0	180	0	0	65	0	0	20	0	0	0
Lane Group Flow (vph)	165	1539	648	38	0	17	0	1145	308	374	847	0
Turn Type	Perm	NA	custom	D.Pm		Over		NA	Perm	Split	NA	
Protected Phases		4	2			1		2		1	1	
Permitted Phases	4			4					2			
Actuated Green, G (s)	35.0	35.0	30.0	35.0		20.5		30.0	30.0	20.5	20.5	
Effective Green, g (s)	35.0	35.0	30.0	35.0		20.5		30.0	30.0	20.5	20.5	
Actuated g/C Ratio	0.35	0.35	0.30	0.35		0.20		0.30	0.30	0.20	0.20	
Clearance Time (s)	5.0	5.0	5.0	5.0		4.5		5.0	5.0	4.5	4.5	
Vehicle Extension (s)	4.0	4.0	5.0	4.0		5.0		5.0	5.0	5.0	5.0	
Lane Grp Cap (vph)	559	1118	429	67		293		1377	429	298	626	
v/s Ratio Prot		c0.48	c0.45			0.01		0.25		0.26	c0.28	
v/s Ratio Perm	0.10			0.20					0.22			
v/c Ratio	0.30	1.38	1.51	0.57		0.06		0.83	0.72	1.26	1.35	
Uniform Delay, d1	23.6	32.5	35.0	26.4		32.0		32.6	31.2	39.8	39.8	
Progression Factor	1.00	1.00	1.00	1.00		1.00		1.00	1.00	1.13	1.14	
Incremental Delay, d2	0.4	175.1	241.6	12.7		0.4		6.0	9.9	117.4	159.9	
Delay (s)	24.0	207.6	276.6	39.0		32.4		38.6	41.1	162.4	205.0	
Level of Service	C	F	F	D		C		D	D	F	F	
Approach Delay (s)		218.2			34.5			39.2			192.0	
Approach LOS		F			C			D			F	

Intersection Summary			
HCM 2000 Control Delay	158.8	HCM 2000 Level of Service	F
HCM 2000 Volume to Capacity ratio	1.42		
Actuated Cycle Length (s)	100.0	Sum of lost time (s)	14.5
Intersection Capacity Utilization	100.2%	ICU Level of Service	G
Analysis Period (min)	15		
c Critical Lane Group			

Movement	EBL	EBT	EBR	WBL	WBT	WBR	NBL	NBT	NBR	SBL	SBT	SBR
Lane Configurations												
Volume (vph)	0	0	0	399	1351	79	434	333	0	0	387	40
Ideal Flow (vphpl)	1850	1850	1850	1850	1850	1850	1850	1850	1850	1850	1850	1850
Total Lost time (s)					4.5		4.5	4.5			3.5	
Lane Util. Factor					0.91		0.97	0.95			0.95	
Frt					0.99		1.00	1.00			0.99	
Flt Protected					0.99		0.95	1.00			1.00	
Satd. Flow (prot)					4512		3100	3195			3164	
Flt Permitted					0.99		0.95	1.00			1.00	
Satd. Flow (perm)					4512		3100	3195			3164	
Peak-hour factor, PHF	0.98	0.98	0.98	0.98	0.98	0.98	0.98	0.98	0.98	0.98	0.98	0.98
Adj. Flow (vph)	0	0	0	407	1379	81	443	340	0	0	395	41
RTOR Reduction (vph)	0	0	0	0	6	0	0	0	0	0	6	0
Lane Group Flow (vph)	0	0	0	0	1861	0	443	340	0	0	430	0
Turn Type				Perm	NA		Prot	NA			NA	
Protected Phases					1		2	2 3			3	
Permitted Phases				1								
Actuated Green, G (s)					31.6		17.5	40.4			18.4	
Effective Green, g (s)					31.6		17.5	40.4			18.4	
Actuated g/C Ratio					0.40		0.22	0.50			0.23	
Clearance Time (s)					4.5		4.5				3.5	
Vehicle Extension (s)					5.0		5.0				5.0	
Lane Grp Cap (vph)					1782		678	1613			727	
v/s Ratio Prot							c0.14	0.11			c0.14	
v/s Ratio Perm					0.41							
v/c Ratio					1.04		0.65	0.21			0.59	
Uniform Delay, d1					24.2		28.5	11.0			27.4	
Progression Factor					1.00		1.00	1.00			1.00	
Incremental Delay, d2					33.9		4.9	0.1			1.9	
Delay (s)					58.1		33.3	11.1			29.4	
Level of Service					E		C	B			C	
Approach Delay (s)		0.0			58.1			23.7			29.4	
Approach LOS		A			E			C			C	

Intersection Summary			
HCM 2000 Control Delay	45.3	HCM 2000 Level of Service	D
HCM 2000 Volume to Capacity ratio	0.82		
Actuated Cycle Length (s)	80.0	Sum of lost time (s)	12.5
Intersection Capacity Utilization	72.8%	ICU Level of Service	C
Analysis Period (min)	15		
c Critical Lane Group			

Movement	EBL	EBT	EBR	WBL	WBT	WBR	NBL	NBT	NBR	SBL	SBT	SBR
Lane Configurations												
Volume (vph)	60	1506	545	12	16	58	124	621	281	167	611	29
Ideal Flow (vphpl)	1850	1850	1850	1850	1850	1850	1850	1850	1850	1850	1850	1850
Total Lost time (s)		4.5			4.5		3.5	4.5	4.5	3.5	4.5	
Lane Util. Factor		0.91			0.95		1.00	0.91	1.00	1.00	0.95	
Frt		0.96			0.90		1.00	1.00	0.85	1.00	0.99	
Flt Protected		1.00			0.99		0.95	1.00	1.00	0.95	1.00	
Satd. Flow (prot)		4408			2855		1598	4591	1430	1598	3174	
Flt Permitted		1.00			0.99		0.95	1.00	1.00	0.95	1.00	
Satd. Flow (perm)		4408			2855		1598	4591	1430	1598	3174	
Peak-hour factor, PHF	0.98	0.98	0.98	0.98	0.98	0.98	0.98	0.98	0.98	0.98	0.98	0.98
Adj. Flow (vph)	61	1537	556	12	16	59	127	634	287	170	623	30
RTOR Reduction (vph)	0	63	0	0	59	0	0	0	95	0	4	0
Lane Group Flow (vph)	0	2091	0	0	28	0	127	634	192	170	649	0
Turn Type	Split	NA		Split	NA		Prot	NA	Perm	Prot	NA	
Protected Phases	4	4		3	3		5	2		1	6	
Permitted Phases									2			
Actuated Green, G (s)		40.3			3.6		8.5	18.5	18.5	10.6	20.6	
Effective Green, g (s)		40.3			3.6		8.5	18.5	18.5	10.6	20.6	
Actuated g/C Ratio		0.45			0.04		0.09	0.21	0.21	0.12	0.23	
Clearance Time (s)		4.5			4.5		3.5	4.5	4.5	3.5	4.5	
Vehicle Extension (s)		3.0			5.0		5.0	1.0	1.0	1.0	5.0	
Lane Grp Cap (vph)		1973			114		150	943	293	188	726	
v/s Ratio Prot		c0.47			c0.01		0.08	0.14		c0.11	c0.20	
v/s Ratio Perm									0.13			
v/c Ratio		1.06			0.25		0.85	0.67	0.65	0.90	0.89	
Uniform Delay, d1		24.9			41.9		40.1	33.0	32.8	39.2	33.6	
Progression Factor		1.00			1.00		1.00	1.00	1.00	1.00	1.00	
Incremental Delay, d2		38.3			2.4		36.0	3.8	10.9	44.5	15.7	
Delay (s)		63.1			44.3		76.1	36.8	43.7	83.7	49.4	
Level of Service		E			D		E	D	D	F	D	
Approach Delay (s)		63.1			44.3			43.4			56.5	
Approach LOS		E			D			D			E	

Intersection Summary			
HCM 2000 Control Delay	56.4	HCM 2000 Level of Service	E
HCM 2000 Volume to Capacity ratio	0.97		
Actuated Cycle Length (s)	90.0	Sum of lost time (s)	17.0
Intersection Capacity Utilization	82.0%	ICU Level of Service	E
Analysis Period (min)	15		
c Critical Lane Group			

Movement	EBL	EBT	EBR	WBL	WBT	WBR	NBL	NBT	NBR	SBL	SBT	SBR
Lane Configurations												
Volume (vph)	60	1506	545	12	16	58	124	621	281	167	611	29
Ideal Flow (vphpl)	1850	1850	1850	1850	1850	1850	1850	1850	1850	1850	1850	1850
Total Lost time (s)		4.5			4.5		3.5	4.5	4.5	3.5	4.5	
Lane Util. Factor		0.91			0.95		1.00	0.91	1.00	1.00	0.95	
Frt		0.96			0.90		1.00	1.00	0.85	1.00	0.99	
Flt Protected		1.00			0.99		0.95	1.00	1.00	0.95	1.00	
Satd. Flow (prot)		4408			2855		1598	4591	1430	1598	3174	
Flt Permitted		1.00			0.99		0.95	1.00	1.00	0.95	1.00	
Satd. Flow (perm)		4408			2855		1598	4591	1430	1598	3174	
Peak-hour factor, PHF	0.98	0.98	0.98	0.98	0.98	0.98	0.98	0.98	0.98	0.98	0.98	0.98
Adj. Flow (vph)	61	1537	556	12	16	59	127	634	287	170	623	30
RTOR Reduction (vph)	0	60	0	0	60	0	0	0	98	0	4	0
Lane Group Flow (vph)	0	2094	0	0	27	0	127	634	189	170	649	0
Turn Type	Split	NA		Split	NA		Prot	NA	Perm	Prot	NA	
Protected Phases	4	4		3	3		5	2		1	6	
Permitted Phases									2			
Actuated Green, G (s)		42.9			2.2		8.3	16.5	16.5	11.4	19.6	
Effective Green, g (s)		42.9			2.2		8.3	16.5	16.5	11.4	19.6	
Actuated g/C Ratio		0.48			0.02		0.09	0.18	0.18	0.13	0.22	
Clearance Time (s)		4.5			4.5		3.5	4.5	4.5	3.5	4.5	
Vehicle Extension (s)		3.0			5.0		5.0	1.0	1.0	1.0	5.0	
Lane Grp Cap (vph)		2101			69		147	841	262	202	691	
v/s Ratio Prot		c0.48			c0.01		0.08	0.14		c0.11	c0.20	
v/s Ratio Perm									0.13			
v/c Ratio		1.00			0.40		0.86	0.75	0.72	0.84	0.94	
Uniform Delay, d1		23.5			43.2		40.3	34.8	34.6	38.4	34.6	
Progression Factor		1.00			1.00		1.00	1.00	1.00	1.00	1.00	
Incremental Delay, d2		18.7			7.7		40.0	6.2	15.8	32.5	22.2	
Delay (s)		42.2			51.0		80.3	41.0	50.4	70.9	56.8	
Level of Service		D			D		F	D	D	E	E	
Approach Delay (s)		42.2			51.0			48.4			59.8	
Approach LOS		D			D			D			E	

Intersection Summary			
HCM 2000 Control Delay	47.5	HCM 2000 Level of Service	D
HCM 2000 Volume to Capacity ratio	0.96		
Actuated Cycle Length (s)	90.0	Sum of lost time (s)	17.0
Intersection Capacity Utilization	82.0%	ICU Level of Service	E
Analysis Period (min)	15		
c Critical Lane Group			

APPENDIX B
Redistribution Calculations

Turning Movement Report
Alt_1 AM

Volume	Northbound			Southbound			Eastbound			Westbound			Total
Type	Left	Thru	Right	Left	Thru	Right	Left	Thru	Right	Left	Thru	Right	Volume
#1 GARFIELD / POMONA													
Base	1139	505	0	0	552	402	0	0	0	364	1512	253	4727
Added	-5	-13	0	0	-50	0	0	0	0	18	5	13	-32
Total	1134	492	0	0	502	402	0	0	0	382	1517	266	4695
#2 GARFIELD / VIA CAMPO													
Base	0	1131	284	171	730	0	149	824	407	40	0	343	4079
Added	0	0	-29	-45	13	0	0	0	0	-13	0	-18	-92
Total	0	1131	255	126	743	0	149	824	407	27	0	325	3987
#3 WILCOX / POMONA													
Base	619	474	0	0	405	72	0	0	0	333	1277	52	3232
Added	79	0	0	0	0	50	0	0	0	0	14	0	143
Total	698	474	0	0	405	122	0	0	0	333	1291	52	3375
#4 WILCOX / VIA CAMPO													
Base	361	1027	202	124	505	45	20	899	298	31	94	58	3664
Added	-7	36	0	0	0	0	43	0	0	0	-14	0	58
Total	354	1063	202	124	505	45	63	899	298	31	80	58	3722

Turning Movement Report
Alt_1 PM

Volume	Northbound			Southbound			Eastbound			Westbound			Total
Type	Left	Thru	Right	Left	Thru	Right	Left	Thru	Right	Left	Thru	Right	Volume
#1 GARFIELD / POMONA													
Base	561	845	0	0	861	121	0	0	0	318	1029	347	4082
Added	-22	-50	0	0	-13	0	0	0	0	72	22	50	59
Total	539	795	0	0	848	121	0	0	0	390	1051	397	4141
#2 GARFIELD / VIA CAMPO													
Base	0	1122	327	396	789	0	162	1509	811	62	0	116	5294
Added	0	0	-7	9	50	0	0	0	0	-50	0	-72	-70
Total	0	1122	320	405	839	0	162	1509	811	12	0	44	5224
#3 WILCOX / POMONA													
Base	432	333	0	0	387	28	0	0	0	399	1346	79	3004
Added	20	0	0	0	0	13	0	0	0	0	4	0	37
Total	452	333	0	0	387	41	0	0	0	399	1350	79	3041
#4 WILCOX / VIA CAMPO													
Base	125	621	281	167	611	29	58	1495	549	12	18	58	4024
Added	-2	9	0	0	0	0	11	0	0	0	-4	0	14
Total	123	630	281	167	611	29	69	1495	549	12	14	58	4038

Turning Movement Report
Alt_2 AM

Volume	Northbound			Southbound			Eastbound			Westbound			Total
Type	Left	Thru	Right	Left	Thru	Right	Left	Thru	Right	Left	Thru	Right	Volume
#1 GARFIELD / POMONA													
Base	1139	505	0	0	552	402	0	0	0	364	1512	253	4727
Added	-3	-6	0	0	-25	0	0	0	0	5	2	12	-15
Total	1136	499	0	0	527	402	0	0	0	369	1514	265	4712
#2 GARFIELD / VIA CAMPO													
Base	0	1131	284	171	730	0	149	824	407	40	0	343	4079
Added	0	0	-25	-21	0	0	0	-4	0	-6	0	-9	-65
Total	0	1131	259	150	730	0	149	820	407	34	0	334	4014
#3 WILCOX / POMONA													
Base	619	474	0	0	405	72	0	0	0	333	1277	52	3232
Added	7	0	0	0	0	47	0	0	0	0	18	0	72
Total	626	474	0	0	405	119	0	0	0	333	1295	52	3304
#4 WILCOX / VIA CAMPO													
Base	361	1027	202	124	505	45	20	899	298	31	94	58	3664
Added	-4	0	0	0	0	0	7	3	-1	0	-7	0	-2
Total	357	1027	202	124	505	45	27	902	297	31	87	58	3662

Turning Movement Report
Alt_2 PM

Volume	Northbound			Southbound			Eastbound			Westbound			Total
Type	Left	Thru	Right	Left	Thru	Right	Left	Thru	Right	Left	Thru	Right	Volume
#1 GARFIELD / POMONA													
Base	561	845	0	0	861	121	0	0	0	318	1029	347	4082
Added	-11	-25	0	0	-6	0	0	0	0	18	7	47	30
Total	550	820	0	0	855	121	0	0	0	336	1036	394	4112
#2 GARFIELD / VIA CAMPO													
Base	0	1122	327	396	789	0	162	1509	811	62	0	116	5294
Added	0	0	-6	12	0	0	0	-1	0	-25	0	-36	-56
Total	0	1122	321	408	789	0	162	1508	811	37	0	80	5238
#3 WILCOX / POMONA													
Base	432	333	0	0	387	28	0	0	0	399	1346	79	3004
Added	2	0	0	0	0	12	0	0	0	0	5	0	19
Total	434	333	0	0	387	40	0	0	0	399	1351	79	3023
#4 WILCOX / VIA CAMPO													
Base	125	621	281	167	611	29	58	1495	549	12	18	58	4024
Added	-1	0	0	0	0	0	2	11	-4	0	-2	0	6
Total	124	621	281	167	611	29	60	1506	545	12	16	58	4030

City of Rosemead

8838 E. VALLEY BOULEVARD P.O BOX 399
ROSEMEAD, CALIFORNIA 91770
TELEPHONE (626) 569-2100
FAX (626) 307-9218

September 29, 2014

Ms. Laura Cornejo, Director
Countywide Planning
Los Angeles County Metropolitan Transportation Authority
One Gateway Plaza, MS 99-22-2
Los Angeles, CA 90012

Re: **Support for the SR 60 Light Rail Transit Alternative**

Dear Ms. Cornejo:

The Rosemead City Council is on record for **unanimous support** of the **SR 60 Light Rail Transit Alternative** for the Goldline Eastside Transit Corridor Phase 2 Project. The SR 60 proposal is the environmentally superior alternative for the following reasons:

The SR 60 is the Most Cost-Effective Alternative. Whereas the Washington Boulevard route would take out nine (9) homes and 58 businesses in order to extend the line 9.5 miles at a price tag of $1.4 billion to $1.7 billion; the SR 60 Freeway route would require demolishing zero (0) homes and only eight (8) businesses on a 6.9-mile route for about $1.3 billion. Due to the availability of **existing public right-of-way** and **vacant land**, the SR 60 Alternative will undoubtedly result in **less direct costs** and **less litigation** than the competing alternative.

The SR 60 Alternative Provides Greater Mobility, Accessibility, and Connectively. The SR 60 Alternative would serve as a regional **"transit trunk line"** connection with existing transportation networks in a way that the **"landlocked" Washington Blvd. Alternative cannot.** Existing freeways, highways, Metrolink, and local and regional bus feeder network (i.e., Metro, Foothill Transit, Montebello Bus Lines, etc.) in proximity to the SR60 route stations will provide **superior connections in all directions**.

The SR 60 Alternative will serve large Low Income and "Transit Dependent" Populations. Large densely populated communities (i.e., 747,000 persons within a 10-minute drive of the Garfield Station) will be served including 293,000 employees. 45,550 households within a 10 minute drive-shed of proposed stations do not have a vehicle, which will generate transit dependent riders. All SR 60 drive shed communities have lower median incomes and higher poverty levels than LA County averages.

The SR 60 Alternative will accommodate robust TOD economic development and housing. The proposed SR 60 route stations have **more underutilized and vacant land** with a lower base that can provide substantial regional economic benefits. It is estimated that the SR 60 route will generate **11,400 new permanent jobs** if all SR 60 Compass Study TOD development is realized.

A careful comparison of all pertinent factors reveals that the SR 60 Alternative is the superior route and the most responsible available option. Your consideration of these factors is greatly appreciated.

Best regards,

William Alarcon
Mayor

c Rosemead City Council
Senator Ed Hernandez
Assembly Member Ed Chau

CITY OF LOS ANGELES

CALIFORNIA

DEPARTMENT OF
PUBLIC WORKS

BUREAU OF
ENGINEERING

GARY LEE MOORE, PE, ENV SP
CITY ENGINEER

1149 S. BROADWAY, SUITE 700
LOS ANGELES, CA 90015-2213

http://eng.lacity.org

October 3, 2014

Ms. Laura Cornejo, Director
Countywide Planning
Los Angeles County Metropolitan
Transportation Authority
One Gateway Plaza, MS 99-22-2
Los Angeles, CA 90012

Eastside Transit Corridor Phase 2 Draft Environmental Impact Statement(EIS)/ Environmental Impact Report (EIR)

Ms. Cornejo,

The City of Los Angeles Bureaus of Engineering and Sanitation have reviewed the Draft Eastside Transit Corridor Phase 2 project (Project) EIS/EIR's, which proposes alternatives to construct the Mission Junction Maintenance Yard (MJMY) within the City of Los Angeles (City).

Based on the Project's Draft EIS/EIR, our preliminary findings show that the City has various sewers and stormdrains within and outside of the proposed MJMY site. These existing facilities are shown on the attached sewer and stormdrain GIS maps for your review. In addition to the MJMY option, our understanding is that there are two other sites outside the City of Los Angeles's City limits that are being considered for the Project's future maintenance yard. Once the MJMY site is selected, the MJMY layout should be sent to us for review. Impacts to the City's infrastructure will require the sewers and stormdrains to be relocated, encased, and/or structurally protected with a structural liner.

For any streets that need to be eliminated and/or realign for the MJMY facility, the plans must be submitted to the City for review and approval.

All work within the City shall be in accordance with the latest City and METRO Transit Authority-Master Cooperative Agreement.

Please feel free to contact Curtis Tran of my staff at 213-485-4505 if you have any questions.

Sincerely,

Michael P. Brown, P.E. G.E.
Division Engineer
Street and Stormwater Improvement Division

Enclosures:
1) Sewer Map
2) Storm Drain Map

Cc: Ted Allen, BOE
Ken Redd, BOE
Samara Ali-Ahmad, BOE
Lawrence Hsu, BOE
Hortensia Alsonso, BOE
Edward Arrington, BOE
Brad Jenson, BOE
Maria Martin, BOE
Carol Armstrong, BOE
Ali Poosti, BOS
Fernando Gonzalez, BOS
Kwasi Berko, BOS

DEPARTMENT OF PUBLIC WORKS

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Pipe ID	51501003515051924
Basin	P01
Upstream Invert	263.90
Downstream Invert	258.03
Length	1173.7
Slope	0.0050
Size	48.0
Width	0
Material	CON
Shape	BM
Street	MISSION RD
Block	300
Liner	
Upstream Stationing	65 + 61.56
Downstream Stationing	53 + 87.82
Month / Year Installed	00 / 1935
Number of Laterals	0
Gravity or Force Main	GR
Comments	NORTH OUTFALL SEWER
Number of Wyes	0
Plan Number	~~DL-976~~ DL-926
Supp Plan Number	D-24746
Profile Number	P-4483
Pipe Status	Active
Pipe Ownership	Undefined
Wye Card Number	132A-217D
Calculated Capacity	105.00000
Engineering District	Central
Rehabilitated	NO

Existing Sewers

54 inch Semi-elliptical Concrete North Outfall Sewer (NOS). (NOS Rehab Unit 10)

Maintenance Hole (MH) No. 515-01-002. Depth is approx. 28 feet.

MH No. 515-01-003. Depth is approx. 30 feet from surface. The MH is buried under a huge asphalt pile from the asphalt plant.

15-foot Easement

The rehabilitation of the NOS will require a large pit due to the sewer curve. Therefore design of the proposed maintenance yard will need to account for this requirement.

N

Not to Scale

Limits of the Mission Junction Maintenance Yard

APNs of properties to be purchased by Metro
5410002003
5410002814
5410005001
5410005003
5410005004
5410005005

24" Sewers of different material and construction years. Outside Yard limits.

48 inch Semi-elliptical Concrete NOS. (NOS Rehab Unit 10)

1,425 feet from MH 515-01-003 to MH 515-01-001 s/o 10 Freeway

96" NEIS (In tunnel)

E CHAVEZ AVE

CESAR E CHAVEZ AVE

MISSION ROAD

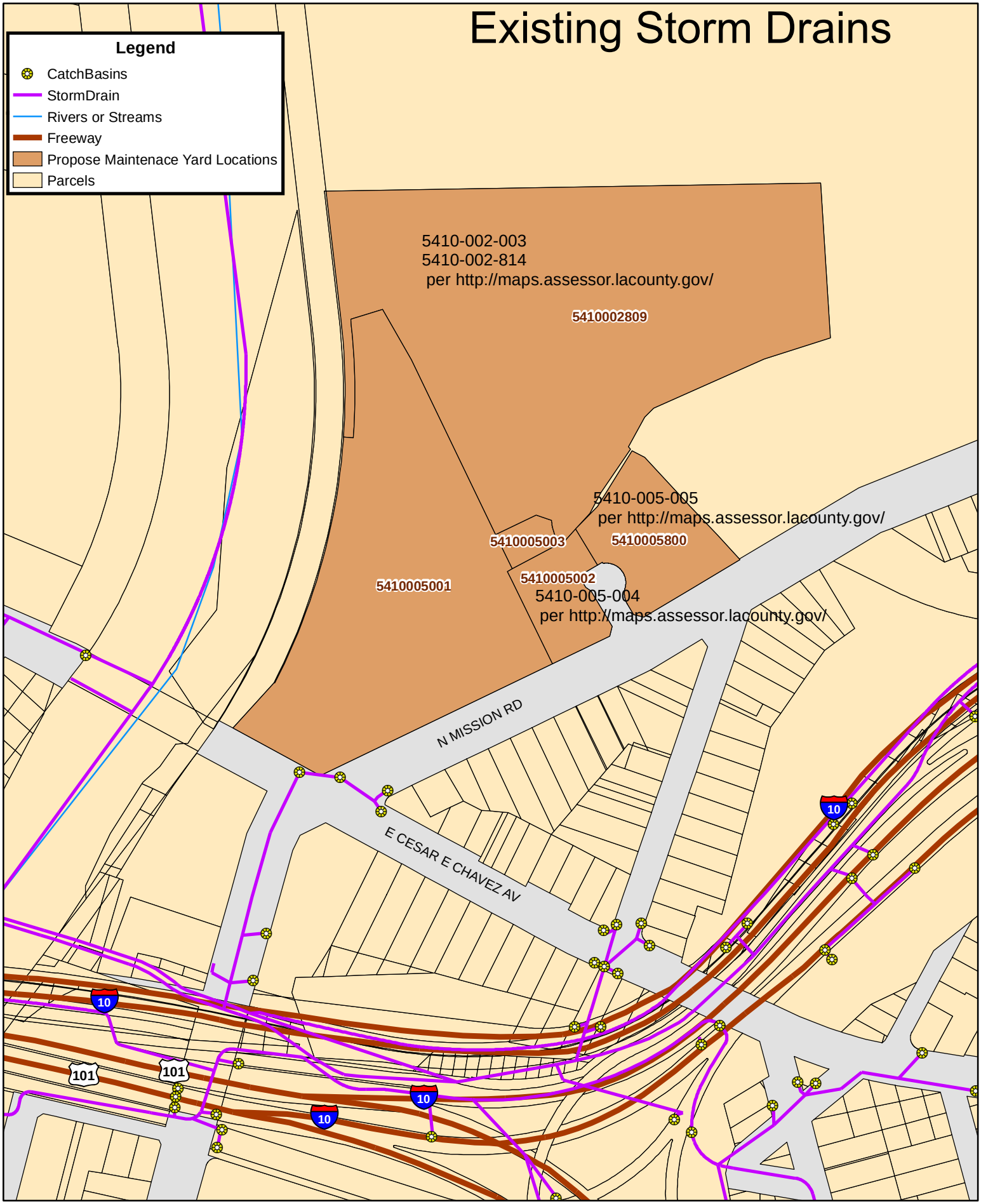
RICHMOND ST

GALILEAR

9/11/14 BOE/WCED COMMENTS

Metro Eastside Transit Corridor Phase 2; Draft EIS-EIR
Proposed Mission Junction Maintenance Yard In City of Los Angeles
Tentative Schedules:
Design: Years 2026-2027
Construction: Years 2027-2035

Sewer Structures : 51501003-Maintenance Hole | 1 'Sewer Pipes' selected | 1 : 2,179 | 1,840 x 1,348 (ft)



Produced by GIS Group
Wastewater Engineering Services Division
Bureau of Sanitation
City of Los Angeles

Created September 11, 2014

\\HTPGIS3\GIS_USers\WESD\Projects\Mapequest\MTA\Maintenance Yard\5410005005.mxd

N
W
E
S

Propose Maintenace Yard Locations

160 80 0 160 Feet

City of Whittier
13230 Penn Street, Whittier, California 90602-1772
(562) 567-9500

October 8, 2014

Laura Cornejo
Director, Countywide Planning
Los Angeles County Metropolitan Transportation Authority
One Gateway Plaza, MS 99-22-2
Los Angeles, CA 90012

Dear Ms. Cornejo:

Re: Eastside Transit Corridor Phase II – Washington Route Support

The Parking and Transportation for the City of Whittier, an advisory board that reports to the City Council, supports the Gold Line Washington Boulevard Extension for Metro's Eastside Transit Corridor Phase II project. The Commission attended the public hearing on September 30, 2014 at the Whittier Senior Center and agendized the item for discussion and comment at the October 2, 2014 regularly scheduled meeting of the Parking and Transportation Commission. The Commission also voted in favor of forwarding comments to the Whittier City Council.

The Commission feels that this route offers the best alignment between the two alternatives for the following main reasons:

- The Washington Boulevard alignment is the longest route at 9.3 miles and therefore will provide transit service to the largest population.
- This alignment provides the opportunity for an intermodal connectivity to Orange County and has the potential to relieve cross-county arterial congestion.
- This alignment parallels and will provide a transit option to the I-5 Freeway.
- This alignment provides access to the highest existing and future employment density as well as the highest existing and future population density.
- This alignment features station locations that are within easy walking distance from both high-density housing and large to medium size industrial facilities.

This project would have immeasurable benefits to the region, in terms of business development and transportation service for our residents. This route could also potentially provide a link to Orange County along Lambert Road for Phase III of Metro's extension eastward.

Thank you for your consideration.

Sincerely,

Yvonne Simon

Ms. Yvonne Simon
Chair of the Parking and Transportation Commission

cc: Mr. David Pelser, Director of Public Works
Ms. Nancy Mendez, Assistant City Manager
Mr. Conal McNamara, Director of Community Development
Parking and Transportation Commission Read file

CITY OF EL MONTE
OFFICE of the CITY COUNCIL

Victoria Martinez
Councilwoman

October 20, 2014

Chairman Eric Garcetti and
Members of the Metro Board
One Gateway Plaza
Los Angeles, CA 90012-2952

RE: Support Letter for the SR-60 Alignment within the Eastside Transit Corridor Phase 2

Honorable Chairman Garcetti and Members of the Metro Board:

As a Councilwoman for the city of El Monte, I am urgently requesting your consideration for the SR-60 Alternative adjacent to the 60 fwy.

I have reviewed the Draft EIR/EIS and am in strong support for the SR-60 Alignment over any other alternative. My decision was based on the findings in the Draft EIR/EIS that states "the SR-60 LRT Alternative would have NO UNAVOIDABLE ADVERSE EFFECTS or SIGNIFICANT IMPACTS on the environment. More importantly, the Washington Blvd LRT Alternative would "have unavoidable adverse effects/significant impacts after implementation of mitigation measures" upon the community and is environmentally inferior to the SR-60 LRT Alternative.

Thank you in advance for acknowledging the findings of the Draft EIR/EIS which clearly find the SR-60 Alternative as the environmentally superior alternative for the Eastside Transit Corridor Phase 2.

Thank you for your support and respectfully request that you and your colleagues on the board vote in favor of the SR-60 Alternative over all other alternatives.

Sincerely,

Victoria Martinez
Councilwoman
City of El Monte

11333 VALLEY BOULEVARD, EL MONTE, CALIFORNIA 91731-3293 / (626) 580-2001 / FAX (626) 453-3612
EMAIL: vmartinez@elmonteca.gov WEBSITE: www.elmonteca.gov

From: Chris Schaefer <CSchaefer@lahabraca.gov>
Sent: Friday, October 03, 2014 11:03 AM
To: EastSidePhase2
Subject: La Habra support to Gold Line extension (Whittier route)
Attachments: LaHabraGP2035 Support for Light Rail (Gold Line).pdf

Good Morning,
I am forwarding to you the excerpt from the recently adopted City of La Habra General Plan 2035 (please see attached). As per Policy AT 1.10 and AT 1.11, the City of La Habra supports the Gold Line extension assuming that it would go through Whittier and would eventually be extended eastward along the Union Pacific right of way, possibly going to the Fullerton Transit Center.
Thanks
Chris

Chris Schaefer, AICP
Senior Planner, Planning Division
City of La Habra • 201 E. La Habra Blvd. • La Habra, CA 90631
Phone: (562) 383-4128 • Fax: (562) 383-4476
Email: cschaefer@lahabraca.gov

From: Megan Whalen <megan.whalen@lacity.org>
Sent: Tuesday, October 21, 2014 5:52 PM
To: EastSidePhase2
Cc: Carlson, Eric; Carol Armstrong; Michael Affeldt
Subject: City of LA, Bureau of Engineering, LA River project Office Comments

To Whom It May Concern:

Please accept our general comments for the MTA Eastside Transit Cooridor Phase 2 Project. Please contact my supervisor, Carol Armstrong, Carol.Armstrong@lacity.org or myself, Megan.Whalen@lacity.org, if you have any questions.

1. The interactive map online (http://interactive.metro.net/projects/eastside_phase2/) does not show the location of the maintenance yard facilities, which can have a significant impact on a neighborhood and its surrounding environment. Specifically, the proposed maintenance yard south of the 1-10 on the LA River (Mission Yard/LATC) is concerning and is not in the spirit of the City's efforts to revitalize the LA River Corridor (please see LA River Revitalization Master Plan (2007) and LA River Ecosystem Restoration Feasibility Study (2013)). This site is also in the footprint of the US Army Corps' Los Angeles River Ecosystem Restoration Feasibility Study (City of LA is Local Sponsor). Currently, there are many maintenance facilities like this along the LA River, preventing safe access and views for people and habitat, and creating dangerous conflicts for humans and wildlife. We ask that Metro does not put a maintenance yard here, or anywhere along the LA River, as it is already heavily impacted with similar facilities and exacerbates socio-economic inequity and environmental injustices in this community. Also, please convey the proposed location of the maintenance yard on all maps and documents, in a consistent manner. Please verify the location of the Mission Junction maintenance yard, as the map location varies from the description of its location in the draft document.

2. Your review and analysis in the Water Resources and Biological Resources discusses the Rio Hondo and San Gabriel rivers but not the Los Angeles River; you must also consider the LA River in your analysis, especially if you plan to place a large, 11-acre maintenance facility adjacent to it. It may be inadvisable to locate any vital facility or structure in the footprint of the historic floodplain considering the unknown impacts due to climate change.

3. Consider bicycle and pedestrian connections, vistas, and amenities, especially close to the LA River and River Corridors, as it is anticipated that more people will want to visit in the future and will also want to take advantage of public transportation to get to there. You may consider providing a ramp for access and maintenance purposes into the LA River Channel on the east and west banks, which will also support MTA's other efforts to study and create a bike path/access road into the LA River. Please work with the Downtown LA River Bikeway Technical Advisory Committee on this partnering opportunity.

Thank you,
Megan

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Megan Whalen
Los Angeles River Project Office
Bureau of Engineering | Department of Public Works
1149 S Broadway, Suite 600
Los Angeles, CA 90015
Mail Stop 939
Office: (213) 485-4560
Megan.Whalen@lacity.org

RESOLUTION NO. 14-37

A RESOLUTION OF THE CITY COUNCIL OF MONTEBELLO STATING THE CITY'S SUPPORT OF THE METROPOLITAN TRANSPORTATION AUTHORITY EASTSIDE TRANSIT CORRIDOR PHASE II

THE CITY COUNCIL OF THE CITY OF MONTEBELLO DOES HEREBY RESOLVE AS FOLLOWS:

WHEREAS, the City of Montebello is committed to being a partner in the Eastside Transit Corridor Phase II project; and

WHEREAS, the Los Angeles County Metropolitan Transportation Authority (Metro) conducted the Alternatives Analysis (AA) phase of the Eastside transit Corridor Phase II project and presented the results of the AA study to their Board of Directors in September 2008; and

WHEREAS, the AA identifies ways to provide a transit connection to cities east of the Metro Gold Line Eastside Extension that was completed in 2009; and

WHEREAS, the project's intention is to improve mobility within the proposed area and plan for the projected population growth; and

WHEREAS, Metro is evaluating two (2) alternative light rail routes; and

WHEREAS, both alternatives traverse the City of Montebello and will impact the socioeconomic fabric of the City for decades to come; and

WHEREAS, the City of Montebello is committed to providing its residents with alternative modes of transportation; and

WHEREAS, the City of Montebello will ensure that the City's Department of Transportation, Montebello Bus Lines, is not impacted negatively by the transit corridor, but rather encourage the department to take advantage of opportunities to enhance its system in coordination with the final alternative; and

WHEREAS, the City of Montebello City Council previously approved Resolution No. 10-78 on September 22, 2010, acknowledging their support of the SR 60 light rail transit alternative.

NOW, THEREFORE, BE IT RESOLVED BY THE CITY COUNCIL OF THE CITY OF MONTEBELLO AS FOLLOWS:

SECTION 1. That the City Council agrees to collaborate with Metro in bringing the Eastside Transit Corridor Phase II to the City.

SECTION 2. That the City Council places its full support behind the SR 60 light rail transit alternative.

SECTION 3. That the City Council directs staff to work with Metro, community stakeholders and neighboring cities in garnering support for the SR 60 light rail transit alternative.

SECTION 4. That the City Clerk of the City of Montebello shall certify to the adoption of this Resolution which shall become effective upon its approval by the City Council.

APPROVED AND ADOPTED this 14th day of May, 2014.

WILLIAM M. MOLINARI, Mayor

ATTEST:

DANIEL HERNANDEZ, City Clerk

STATE OF CALIFORNIA)
COUNTY OF LOS ANGELES)ss.
CITY OF MONTEBELLO)

I, Daniel Hernandez, City Clerk of the City of Montebello, do hereby certify that the foregoing Resolution No.14-37 as duly regularly approved and adopted by the Montebello City Council at a regular meeting held on 14th day of May, approved by law by the following vote:

AYES:	Councilmember:	**Barajas, Cortez, Molinari**
NOES:	Councilmember:	
ABSTAIN:	Councilmember:	**Hadjinian Romero**
ABSENT:	Councilmember:	

IN WITNESS WHEREOF, I have hereunto set my hand and affixed the official seal of said City on the 14th day of May 2014.

Daniel Hernandez, City Clerk

Cooperating Agencies

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

OCT 21 2014

Raymond Sukys
Director, Office of Planning and Program Development
Federal Transit Administration, Region 9
201 Mission Street, Suite 1650
San Francisco, California 94105-1839

Subject: Draft Environmental Impact Statement for the Proposed Eastside Transit Corridor Phase 2 Project, Los Angeles County, California [CEQ #20140239]

Dear Mr. Sukys:

The U.S. Environmental Protection Agency (EPA) has reviewed the Draft Environmental Impact Statement (DEIS) for the Eastside Transit Corridor Phase 2 Project, a proposed light rail line extending service eastward to either the City of South El Monte or the City of Whittier, California. EPA is a "Participating Agency" (as defined in 23 U.S.C. 139) and a "Cooperating Agency" (as defined in the Council on Environmental Quality's NEPA Implementing Regulations). Our comments are provided pursuant to the National Environmental Policy Act (NEPA), Council on Environmental Quality regulations, and Section 309 of the Clean Air Act.

In addition to our role in providing comments through the NEPA process, EPA also has an independent regulatory role with respect to a portion of the State Route 60 Alternative (SR-60 Alternative). Since the mid-1980's, EPA has been undertaking response and cleanup actions at the Operating Industries, Inc. Superfund Site (OII Site) in Monterey Park pursuant to the Comprehensive Environmental Response Compensation, and Liability Act of 1980, as amended, 42 U.S.C. Section 9601 et seq. Over the past almost thirty years, significant threats to human health and the environment have been addressed at the OII Site using a wide-range of cleanup methods to address landfill slope stability, methane gas fire/explosion risks, control of contaminated liquids/leachate inside the landfill and contaminated groundwater beneath the landfill. Past and future cleanup costs will be approximately $600 million. The Region 9 Superfund Division has assisted in developing the comments attached to this letter. Importantly, in addition to the NEPA process, any third party design and construction activities at the OII Site would require EPA Superfund review and approval to ensure that such activities do not interfere with ongoing cleanup measures and that no new threats to human health and the environment are created by the construction and operation of a light rail line through the OII Site.

EPA strongly supports the development of public transit projects, as well as the productive reuse of remediated sites, so long as such reuse can be accomplished in a manner protective of human health and the environment. Further, EPA has experience successfully working to mitigate the impacts of construction of a rail system project at a landfill in another region of the country. Transit projects are

particularly important in the project area, given the congested traffic conditions in Los Angeles, and some of the worst air pollution in the country. In addition to serving a large number of transit-dependent and low-income populations in the study area, the proposed project could improve air quality by providing a convenient and reliable alternative to the automobile. Because Federal Transit Administration and Los Angeles Country Metropolitan Transportation Authority have not yet identified a preferred alternative, EPA's comments address and rate each Alternative proposed in the DEIS.

State Route 60 Alternative

The location for the SR-60 Alternative introduces a high degree of complexity and heightened engineering challenges since construction and operation of a light rail facility will directly impact the OII Superfund Site. While EPA acknowledges the benefits of transit to the region, as well as the desirability of making productive use of a remediated site, the DEIS does not contain sufficient analysis to address the uncertainties and potential risks to human health and the environment that may result from construction and operation of a new light rail through or near the OII Site. EPA believes that, prior to the project moving forward, it is essential that additional safety-related studies are undertaken to address these uncertainties and to ensure public disclosure, and informed decision-making related to: 1) landslides, 2) seismic risks, 3) fill integrity, 4) hazardous waste releases, and 5) impacts to groundwater contamination control where the SR-60 Alternative affects the OII Site. Due to the magnitude of the uncertainties remaining and given the possible impacts to health and the environment that will require further project design commitments to reduce impacts, EPA has rated the SR-60 Alternative, as "*Environmental Objections – Insufficient Information*, (EO-2)". The enclosed "Summary of EPA Ratings Definitions" further describes the ratings. EPA's authorities under CERCLA (the Comprehensive Environmental Response, Compensation, and Liability Act) allow EPA to take action to prevent interference with or the compromise of any remedial actions taken under the Superfund program. EPA further notes that, given the rather lengthy period until project construction is likely to begin (estimated as 2027-2032), it is very likely that supplemental NEPA work will be necessary prior to undertaking this project due to changes in circumstances and the surrounding environment.

North Side Design Variation of the State Route 60 Alternative

Given the heightened uncertainties and possible environmental risks of the SR-60 Alternative, EPA supports continued refinements to a variation of the alignment, the "North Side Design Variation SR-60 LRT Alternative", which offers an opportunity to meet the project purpose and need with lower potential risks to health and the environment than is anticipated from the "baseline SR-60 Alternative". The North Side Design Variation would traverse the OII Site on the north side of SR-60, rather than siting a future light rail directly adjacent to, and at the toe of, the steep slope of the South Parcel of the OII Site. However, the North Side Design Variation also requires critical analysis and design commitments to ensure public health and safety, as well as integrity of the OII Site remedial actions.

Washington Boulevard Alternative

EPA has separately rated the Washington Boulevard Alternative as "*Environmental Concerns – Insufficient Information*, (EC-2)" based on concerns related to contamination in soil, soil vapor and groundwater investigation associated with a separate Superfund Site, the Omega Chemical Superfund Site.

Transportation System Management Alternative

EPA has separately rated the Transportation System Management (TSM) Alternative as "*Lack of Objections*, (LO)" and has no additional recommendations for this Alternative. Should FTA/Metro choose to construct either of the two "build alternatives", the SR-60 or the Washington Boulevard Alternative, EPA supports commitments to adopt integration of TSM elements as feasible.

The enclosed detailed comments further describe the issues discussed above. Thank you for the opportunity to comment on the DEIS. We look forward to continued conversations to ensure the benefits of the proposed transit project are considered in the context of impacts to public health and safety associated with potential disturbance at the OII Superfund Site, and with appropriate mitigation commitments. To further discuss EPA's comments and to discuss a strategy for resolution of the issues identified, please contact Connell Dunning, the Transportation Team Supervisor for transportation projects in Region 9 (415-947-4161 or dunning.connell@epa.gov).

Sincerely,

Lisa B. Hanf, Assistant Director
Enforcement Division

Enclosures: Summary of EPA Rating Definitions
EPA's Detailed Comments on the Eastside Transit Corridor DEIS

cc: Ray Tellis, Federal Transit Administration
Mary Nguyen, Federal Transit Administration
Laura Cornejo, Los Angeles County Metropolitan Transportation Authority

SUMMARY OF EPA RATING DEFINITIONS*

This rating system was developed as a means to summarize the U.S. Environmental Protection Agency's (EPA) level of concern with a proposed action. The ratings are a combination of alphabetical categories for evaluation of the environmental impacts of the proposal and numerical categories for evaluation of the adequacy of the Environmental Impact Statement (EIS).

ENVIRONMENTAL IMPACT OF THE ACTION

"LO" (Lack of Objections)

The EPA review has not identified any potential environmental impacts requiring substantive changes to the proposal. The review may have disclosed opportunities for application of mitigation measures that could be accomplished with no more than minor changes to the proposal.

"EC" (Environmental Concerns)

The EPA review has identified environmental impacts that should be avoided in order to fully protect the environment. Corrective measures may require changes to the preferred alternative or application of mitigation measures that can reduce the environmental impact. EPA would like to work with the lead agency to reduce these impacts.

"EO" (Environmental Objections)

The EPA review has identified significant environmental impacts that should be avoided in order to provide adequate protection for the environment. Corrective measures may require substantial changes to the preferred alternative or consideration of some other project alternative (including the no action alternative or a new alternative). EPA intends to work with the lead agency to reduce these impacts.

"EU" (Environmentally Unsatisfactory)

The EPA review has identified adverse environmental impacts that are of sufficient magnitude that they are unsatisfactory from the standpoint of public health or welfare or environmental quality. EPA intends to work with the lead agency to reduce these impacts. If the potentially unsatisfactory impacts are not corrected at the final EIS stage, this proposal will be recommended for referral to the Council on Environmental Quality (CEQ).

ADEQUACY OF THE IMPACT STATEMENT

"Category 1" (Adequate)

EPA believes the draft EIS adequately sets forth the environmental impact(s) of the preferred alternative and those of the alternatives reasonably available to the project or action. No further analysis or data collection is necessary, but the reviewer may suggest the addition of clarifying language or information.

"Category 2" (Insufficient Information)

The draft EIS does not contain sufficient information for EPA to fully assess environmental impacts that should be avoided in order to fully protect the environment, or the EPA reviewer has identified new reasonably available alternatives that are within the spectrum of alternatives analysed in the draft EIS, which could reduce the environmental impacts of the action. The identified additional information, data, analyses, or discussion should be included in the final EIS.

"Category 3" (Inadequate)

EPA does not believe that the draft EIS adequately assesses potentially significant environmental impacts of the action, or the EPA reviewer has identified new, reasonably available alternatives that are outside of the spectrum of alternatives analysed in the draft EIS, which should be analysed in order to reduce the potentially significant environmental impacts. EPA believes that the identified additional information, data, analyses, or discussions are of such a magnitude that they should have full public review at a draft stage. EPA does not believe that the draft EIS is adequate for the purposes of the NEPA and/or Section 309 review, and thus should be formally revised and made available for public comment in a supplemental or revised draft EIS. On the basis of the potential significant impacts involved, this proposal could be a candidate for referral to the CEQ.

*From EPA Manual 1640, Policy and Procedures for the Review of Federal Actions Impacting the Environment.

SR-60 Alternative

The Federal Transit Administration and Los Angeles County Metropolitan Transportation Authority propose to extend the existing Eastside Light Rail to the east, along State Route 60 (SR-60 Alternative) or along Washington Boulevard (Washington Boulevard Alternative). The SR-60 Alternative would extend a light rail track through the Operating Industries, Inc. Superfund Site (OII Site), which will still be undergoing active remediation through the project's forecast construction phase in the years 2027-2035. Compromising the integrity of remediation activities through new construction and operation of the project may pose a significant and avoidable risk to human health and the environment, which should be fully evaluated and disclosed in the National Environmental Policy Act process. However, we understand that FTA/Metro intend to prepare this analysis in the future once a locally preferred alternative has been identified. The DEIS therefore defers critical analysis and does not sufficiently describe and evaluate landslide risk, seismic stability, fill integrity, and possible waste release and groundwater contamination associated with the SR-60 Alternative as it passes through the OII Site. This information is critical for decision-making.

Specifically, the greatest uncertainties and risks are associated with the "Baseline SR-60 Alternative" alignment where it is directly adjacent to, and at the toe of the steep slope of, the South Parcel of the OII Site. The DEIS also includes an insufficient analysis of a northern variation of this alignment, the "North Side Variation SR-60 Alternative", which would cross the OII Site to the north of SR-60 in a location preferable to crossing the Site along the steep slope of the South Parcel, so long as the risks to human health and safety are sufficiently analyzed and addressed prior to a NEPA determination on the project.

The recommendations to address the uncertainties and risks highlighted by EPA below were also included in our August 30, 2012 letter to FTA/Metro following our review of an Administrative Draft of the DEIS. FTA/Metro prepared a Technical Memorandum on July 31, 2013 (included as DEIS Attachment 1 to Appendix V) to address EPA's Administrative Draft comments and recommendations. We appreciate that the DEIS provides considerable detail (particularly in Section 4.11) on proposed mitigation measures intended to address uncertainty and risk related to potential hazards during construction and operation of the project. However, a greater extent and scope of design commitments, along with a more robust analysis and understanding of the existing subsurface conditions along the proposed route, are necessary given the complexity of constructing a light rail through the OII Site. The analysis provided in the DEIS and Appendix V does not fully address significant uncertainties and risks in the vicinity of the OII Site, and the potential impacts these could have on construction and operation of the proposed project, and associated slope stability at the OII Site.

Landslide Risks

The DEIS identifies three ancient landslides and states that these natural landslides do not appear to be a hazard because of the extensive grading activities which took place in the area (Pages 4.11-19). Additional supporting documentation is needed to conclude that these landslides no longer exist or will not impact the OII Site facilities as a result of the proposed light rail construction. As noted by FTA/Metro in documents provided in Appendix V, Attachment 1, and Appendix A, there may be more landslides present along the northern boundary of the Southern Parcel of the OII Site than the three landslides discussed in the DEIS. For example, on page A.2.12, Section 5 of the Memorandum Report by Environmental Solutions Inc. (1996), it is stated "...there exists numerous surface failures

(landslides) along a ridge trending along the north boundary of the South Parcel of the site..." In addition, a similar statement was made on page B.2.1-3 (Letter Report by Cluff and Brogan (1996)), which stated that "Other landslide-related features were observed elsewhere in the hills of the site vicinity". The DEIS should analyze and disclose the potential for additional landslides, as well as project commitments to ensure possible landslides will not harm human health and the environment with the construction and operation of a light rail.

Recommendations:
Consistent with the FTA/Metro characterizations in the DEIS (Pages 4.11-24 and 4.11-30; Page 12, Appendix V), EPA reaffirms the need for, and recommends additional evaluation of, ancient landslides, prior to selection of an alternative that includes construction and operation of the light rail along the SR-60 alignment.

To determine if additional slides are a potential hazard and would be affected by a proposed light rail alignment, EPA recommends that FTA/Metro develop geological maps and cross-sections showing the limits of the existing landslides on the project site, based on site-specific empirical data (subsurface exploration and site mapping) as well as previously published documents.

Characterize the geotechnical properties and extent of the ancient landslides, and analyze potential slope stability hazards relative to the proposed light rail alignment and OII Site slopes. Include areal limits (plan view) of the existing landslides with respect to the current topography and planned improvements with the cross sections presented in Appendix V, Attachment 1.

Evaluate whether new fill and retaining walls along with changes in drainage patterns (especially with the North Side Design Variation), could reactivate the landslides, and, if so, how these changes could potentially impact the SR-60 Alternative and/or OII Site facilities.

In several instances, the DEIS states that the landslides have been removed, truncated, or buried. In addition to potential slope stability concerns, landslide debris typically is composed of disturbed material that is highly fractured and sheared, with mixed non-homogeneous soil and/or rock debris that can have unpredictable zones of loose and weak material.

Recommendations:
Evaluate and disclose the engineering properties and the environmental impacts of the construction associated with the alignment and describe design features necessary to insure viability and human safety, especially for light rail pile foundations. For example, Figures SP-2 and SP-3 (Appendix V, C.1 - Attachment 1) show the light rail pile foundations embedded in what appears to be landslide debris. Address potential settlement of the slide material due to the light rail loads and the impact to overall stability of the adjacent slopes underlain by slide material. Provide commitments for design features to address these issues.

Section A-A' in Figure A.2.16 (Appendix V, Attachment 1) of the DEIS shows a landslide below and north of SR-60, west of Greenwood Avenue. This section indicates that alluvium is covering the toe of the slide and perhaps acts as a buttress for the slide. However, there is no subsurface data provided in the immediate toe area of the slide to support this interpretation, and no slope stability analyses has been provided. Section A-A' is a single section in an area where landslides exists in the vicinity of the SR-60 Alternative.

Recommendations:
Conduct detailed site-specific geotechnical analyses necessary to evaluate the conclusion that alluvium acts as a buttress for the landslide area north of SR-60 and West of Greenwood Avenue. If the slope stability analysis indicates additional supporting structures are needed, clarify this as a part of the proposed SR-60 Alternative.

Integrity of Fill Material
Appendix V, Page 16, states that as much as 40 feet of fill was placed west of Greenwood Avenue (as part of the SR-60 construction) buttressing the slope to the south. However, as shown on the existing SR-60 drawings (Appendix V, A.3-Attachment 1) hardly any fill was placed and even minor cuts were made just west of Greenwood, which is within the area of a mapped landslide, and does not provide a buttress.

Recommendations:
Identify and evaluate the limits of the fill geometry, especially in the area north of SR-60 and west of Greenwood Avenue. Conduct a thorough review of the 1996 Environmental Solutions report for which many of the conclusions in Appendix V, Attachment 1 are based and review any available grading reports for the fill in the area. Additionally, conduct site-specific studies of geotechnical data to confirm the adequacy and integrity of the fill as a foundation for construction of a light rail alignment and to confirm the slope stability statements included throughout the DEIS.

Determine if the landslide was removed as part of the grading in this area or if the fill was placed on top of the landslide. Include documentation to confirm adequate buttressing, with the fill having to be keyed into "competent" material in front of the landslide or other previously implemented mitigation measures for adequate buttressing.

Seismic Risk
Appendix V, Page 32, states that "slope stability concerns for the adjacent SR-60 and the landfill are presumed to have already been addressed as part of the landfill closure and original freeway construction activities to minimize such hazard". However, site-specific evaluations are required for the land within the seismic hazard zones that are included in the footprint of the proposed light rail alignment. It is especially critical to confirm current seismic risks prior to construction, since additional seismic information may have become available since the roadway construction was completed over 50 year ago.

Recommendations:
As required in the State of California's designated Seismic Hazard Zones, include site-specific analyses of the potential seismic hazards associated with the project. Further, include actual landslide limits rather than referring to zones of potential earthquake induced instability, as presented in the Seismic Hazard Zone Map for El Monte (CGS, 1999) included in Appendix V (A.1 –Attachment 1).

Hazardous Material Release
Landfill waste was historically disposed of under SR-60, in the Caltrans right-of-way, and in the steep slope of the South Parcel of the OII Site. The landfill waste under the roadbed and the Caltrans right-of-way is poorly characterized. The DEIS does not sufficiently demonstrate that construction and operation of the project on or near the OII Site would not result in the release of hazardous materials.

Recommendations:
EPA recommends that FTA/Metro map and characterize subsurface hazardous waste for the preferred alignment. A range of possible mitigation measures and their related costs should be presented to the public and decision makers to aid in understanding the possible design features that may be required in order to ensure human health and safety and to minimize environmental impacts, including commitments that construction and operation of the project on or near the OII Site would not result in hazardous material releases.

Groundwater Contamination Control
The DEIS discusses potential issues associated with encountering contaminated groundwater during pile construction and as part of construction dewatering activities, particularly if cast-in-drilled-hole (CIDH) piles are used (Table ES-2, Table 4.11-4). However, the DEIS does not discuss how pile construction and associated construction dewatering may adversely impact two of the operating perimeter liquids control systems at OII. Perimeter liquids control is being provided through groundwater extraction wells operating at the eastern end of the South Parcel and the western end of the North Parcel. The proposed Baseline SR-60 Alternative and North Side Design Variation both pass relatively close to these active systems and the depth to groundwater beneath the proposed light rail may only be 50-75 feet below ground surface.

Recommendation:
Analyze the potential impacts of construction and operation of the SR-60 Alternative on the existing perimeter liquids control containment systems at the OII Site and identify mitigation measures that will protect the integrity of the remedy.

Integrity of Remedy & Maintenance
In addition to the recommendations provided by EPA through the NEPA process, additional, significant pre-design investigation will be required to satisfy remaining uncertainties related to any Alternative selected that traverses the OII Site. Ultimately, the EPA Superfund Program will require assurance, outside of the NEPA process, that the light rail will not negatively impact the remedy in a way that compromises protectiveness of human health and the environment. This protectiveness includes maintaining landfill slope stability, methane gas collection systems, liquids/leachate collection systems, and groundwater protection. While both SR-60 design variations present these challenges, EPA notes that construction of the South Side Design Variation will require more significant and costly geotechnical analysis and design studies, in addition to offering much greater uncertainty, in comparison to the North Side Design Variation.

North Side Design Variation
To propose a SR-60 design variation with less uncertainty and risk, FTA/Metro, at the request of EPA, developed the SR-60 North Side Design Variation as an alternative alignment to the "Baseline SR-60 Alternative" for the portion of the route as it passes through the OII Site. EPA appreciates FTA/Metro developing a viable SR-60 variation to the north. The North Side Design Variation offers an opportunity to greatly reduce uncertainty and risks associated with a new light rail alignment through the OII Site, as it alleviates construction of the light rail at the toe of the steep slope that is part of the cap on the South Parcel of the OII Site. In addition, because of the extensive efforts of the 2010 Remedial Project for the North Parcel, the range of uncertainty confronting the proposed project on the North Side Design Variation is considerably reduced.

Although the North Side Design Variation is proposed as an alternative to avoid the South Parcel, and EPA agrees that it offers an opportunity to greatly reduce uncertainty and risks, we note that it still traverses a portion of the OII Site's South Parcel, and would also require additional analysis and measures to avoid potential impacts to the OII Site. Further, many of the landslide analyses and hazard evaluation needs of the baseline SR-60 Alternative (as described above) would also need to be completed for the North Side Design Variation. Though there are still some uncertainties associated with the North Side Design Variation, reliable information from North Parcel remedial activities can help address uncertainties and guide any pre-design investigation along the Caltrans right-of-way.

Recommendations:
EPA recommends FTA/Metro complete the necessary analyses described by FTA/Metro in the DEIS on page 4.11-24 and 4.11-30, and on page 12 of Appendix V as a part of the NEPA process, rather than deferring to a future project design timeframe. This would address the insufficient analysis related to uncertainty for all Build Variants on SR-60. EPA recommends presenting a comparison of the range of uncertainties and possible risks between the Baseline SR-60 Alternative and the North Side Design Variation, to clearly demonstrate the difference between the variations along SR-60.

On page 15 of Appendix V, and repeated in the main text of the DEIS, FTA/Metro states "The north side of the highway does not pose a slope stability concern because of the limited slope height, given the lay of the land." However, the DEIS does not include sufficient technical information to support this conclusion. For example, FTA/Metro provide documentation in Appendix V that the vertical and lateral limits of the landslides are not well understood, and are roughly based on small scale regional maps and limited subsurface data. Further, EPA is aware that there are some visibility concerns with the North Side Design Variation Alternative.

Recommendations:
Provide documentation to support the conclusion that the North Side Design Variation does not pose a slope stability concern.

Identify measures to address visibility concerns raised by the North Side Design Variation in relation to the future OII Site's North Parcel commercial development.

Site Access
The Greenwood Avenue Bridge connects the two OII parcels, is used by tall trucks, and hosts the utility connections that maintain remedy operations. By shuttling OII traffic onto this bridge, impacts to adjacent communities in Montebello are minimized. The DEIS does not specify the location of the North Side Design Variation's westernmost bridge that would cross SR-60, and what grade changes are necessary to protect the existing Greenwood Avenue Bridge and North Parcel pump-and-treat facility.

Recommendation:
Identify the location of the North Side Variation westernmost bridge across SR-60, and what grade changes are necessary to protect existing tall truck access on the Greenwood Avenue Bridge, or whether any changes to the Greenwood Avenue Bridge would be required.

Washington Boulevard Alternative

Omega Chemical Superfund Site Coordination

The DEIS correctly summarizes (pages 4.11-12, 4.11-20, 4.11-39) EPA's concern that the at-grade Washington Boulevard Alternative would be built in proximity to the contaminated groundwater plume under Washington Boulevard. The plume is originating from the former Omega Chemical facility in Whittier, CA, and commingled with contamination from other source areas such that contaminated groundwater extends approximately four and one-half miles into the cities of Santa Fe Springs and Norwalk. EPA's concerns include potential impacts to current and/or future remedial actions at the Site; contact with, and disposal of, contaminated soil and/or groundwater encountered during construction; and potential intrusion of vapors from the soil into structures.

Recommendation:

If the Washington Boulevard Alternative is selected as the Locally Preferred Alternative, EPA recommends that FTA/Metro evaluate the Alternative's potential impact(s) on remedial actions occurring or proposed at the Omega Chemical Superfund Site. Evaluate possible groundwater and/or soil vapor intrusion near proposed construction in the vicinity of the Site, and commit to mitigation measures, as appropriate, to address the potential impacts on remedial actions and potential intrusion of vapors into structures. FTA/Metro will need to ensure that construction of the light rail in this area will not disrupt current and proposed remedial actions in place at the Omega Site.

Transit Oriented Development and Community Involvement

EPA, in partnership with Department of Housing and Urban Development and Department of Transportation, encourages the advancement of sustainable communities, including transit-oriented development. As the DEIS (ES-3) and appendices (Appendix P, page 50) describe, the proposed project can lead to "potential new transit-oriented development opportunities around the station that would be beneficial to the community" and encourage growth and sustainable economic development (Appendix P, page 53). The DEIS recognizes community concerns about relocating 9 residences and 58 businesses (DEIS, Table 4.3-2), lost and displaced parking (DEIS, page 3-54), and low pedestrian volumes in the project area (DEIS, page 3-57). We encourage FTA/Metro to engage the community to identify mitigation measures and design features to best integrate the new facility in the existing setting if this Alternative is further studied.

The DEIS states that the Washington Boulevard Alternative may remove 1,685 or more (Table 4.3-2) parking spaces in phases before a total of 3,145 off-street parking spaces are provided at six proposed stations for this Build Alternative (DEIS, page 3-55). The DEIS also shows that when the replacement parking is built-out for the Washington Boulevard Alternative, it will exceed peak demand by 740 spaces (DEIS, page 3-55). Exceeding peak demand for parking at the proposed transit stations has the potential to affect transit choices and use by other modes, and may also induce car use.

Recommendations:

EPA encourages FTA/Metro to continue to engage communities that may be adversely impacted by the Washington Boulevard Alternative, and use that process to identify community issues, mitigation measures, and design options that FTA/Metro can commit to in developing the Build Alternative. EPA continues to encourage station area design that minimizes the number of parking spaces to the greatest extent possible at the station, and to prioritize intermodal, pedestrian, and bicycle access to encourage transit use and associated sustainable community development.

DEPARTMENT OF TRANSPORTATION
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Serious drought.
Help save water!

October 14, 2014

Ms. Laura Cornejo, Project Director
Countywide Planning
Los Angeles County Metropolitan Transportation Agency
One Gateway Plaza, MS 99-22-2
Los Angeles, CA 90012

Dear Ms. Cornejo:

The California Department of Transportation (Caltrans) has reviewed the Draft Environmental Impact Statement/ Environmental Impact Report for the Metro Eastside Transit Corridor Phase 2 project. Areas of concern to Caltrans for this project include locations where the proposed light rail alignment crosses over/under our freeway, utilizes state owned bridges, as well as locations where the proposed light rail facilities may impact traffic operations at freeway on ramps and off ramps or impact safety of the motoring public. The following are our comments.

1. Recommend coordination with our Environmental Division for any architectural design treatments being proposed for any pedestrian crossings that span over SR-60 that will be modified as a result of the Eastside Transit Corridor Phase 2 project. We would like input/review as to the type of any aesthetic treatments and/or architectural designs being proposed.

2. For any landscaping within our right-of-way the Environmental Division requests to review the draft landscaping plan. In addition, any tree removal proposed within our right-of-way we be notified before it is to be removed.

3. Future widening of the SR-60 should be provided with the SR-60 Alternative. Based on plans presented it appears at the off and on ramps the columns do not allow for future widening.

4. There is a project that is realigning the Paramount Boulevard/ SR-60 interchange which should be accounted for with the SR-60 alternative.

5. SR-60 alternative may impact the existing GSRD's along the south side of the freeway and should be mitigated.

6. Page 2-14 first paragraph Table 2-3 should be 2-4 for R/W requirements.

7. The median does not appear wide enough to accommodate the columns for the SR-60 North Side design Variation.

8. For the Washington Boulevard Alternative, the minimum vertical clearance must be maintained for the proposed grade separation crossing over I-605. The plans show 25.5' clearance to top of rail but does not show structure depth. Also, the minimum vertical clearance is not provided for the proposed Rosemead Boulevard grade separation.

9. There is not enough information to determine if there are non-standard design features that need to be addressed.

10. This project will require Caltrans Encroachment Permit and will go through extensive reviews to ensure compliance with State Standards before it will be cleared to proceed to construction. Some of the involved functional reviewers include traffic operations, right-of-way, structures, landscaping, Hazardous Waste/Material, Maintenance, …

11. Taking the existing SR-60 highway ROW for the Eastside Transit Corridor Phase 2 project would severely limit the possibility of expanding, widening or making improvements to our facility, a critical freeway corridor. In the future, should the SR-60 roadway be needed to be widened, and with the Eastside Transit Corridor Phase 2 rail line running right next to the existing highway, the improvements will become extremely difficult and expensive, especially if new ROW is needed.

12. The Washington Alternative from this perspective will work much better than the SR-60 alternative. Washington Blvd runs through most of, if not all of the target population centers which would make the line very accessible to the residents in the target area. It will reach a lot more riders, which will encourage even more people to use it because of its accessibility. It would minimize the number of rail based- vehicle trips because riders will not have to drive to get to the stations, hence will help reduce air pollution, traffic congestion on surface streets, reduce vehicle generated noise pollution, it will boost the local economy especially near the stations while this cannot be achieved if the line to be placed on SR-60.

13. The Whittier Blvd is also an excellent alternative that might warrant looking into again.

14. Traffic congestion will need to be mitigated where the train stations (Garfield, Montebello, Santa Anita and Peck Road) will be located, especially the Garfield Station. This area is already heavily congested and will surely have adverse impacts to the on and off ramps to SR-60 and surrounding neighborhoods, especially during peak hours. Truck traffic is also heavy in the vicinity of Garfield Avenue/Via Compo and Pomona. Major roadway reconfigurations and widening will need to be considered at this station. We have many complaints from citizens regarding excessive traffic delay during peak hours at Garfield/Via Campo and Garfield/Pomona.

15. Construction hours should be during off peak hours to reduce traffic congestion at the Garfield Station and all other stations with nearby freeway ramps.

16. Recommend the City of Montebello be involved in the construction of the LRT to address traffic congestion at the intersections of Garfield and Via Campo and Pomona (and others nearby) since the intersection and street widening in the area might need to be mitigated to accommodate the project.

17. Cumulative traffic impacts, including future growth and development in the communities near the stations will worsen the traffic congestion and might affect the on and off ramps to SR-60.

18. There will need to be full freeway, mainline, ramp, connector and city street closures during the extension of the Light Rail project. Traffic control will be needed to guide motorists during the closures of these facilities especially if there are any long term closures. Public awareness will also be needed to inform the public and businesses of the pending construction activities and what the proposed route will be.

Thank you for the opportunity to comment on this project. We look forward to continuing our collaboration with your agency on this important endeavor. If you have any questions, please contact me at (213) 897-8316.

Sincerely,

Reza Fateh, PE. PMP
Project Manager

DEPARTMENT OF THE ARMY
LOS ANGELES DISTRICT, U.S. ARMY CORPS OF ENGINEERS
915 WILSHIRE BOULEVARD, SUITE 930
LOS ANGELES, CALIFORNIA 90017

October 21, 2014

Asset Management Division

Ms. Laura Cornejo
Director, Countywide Planning
Los Angeles County Metropolitan Transportation Authority
One Gateway Plaza, MS 99-22-2
Los Angeles, California 90012
Email: eastsidephase2@metro.net

Dear Ms. Cornejo:

The United States Army Corps of Engineers (USACE) appreciates the opportunity to coordinate with the Los Angeles County Metropolitan Transportation Authority (Metro) during the environmental review process for the Eastside Transit Corridor Phase 2 Project, and to act as a Cooperating Agency as defined in the Council on Environmental Quality's National Environmental Policy Act (NEPA) Implementing Regulations (40 CFR 1508.5). USACE provided comments on prior versions of this draft Environmental Impacts Statement (dEIS) in letters dated September 7, 2012, and April 17, 2014. USACE staff has reviewed the current dEIS and we thank Metro for addressing many of our prior concerns and suggestions relating to the level of detail in the document and demonstration of compliance with applicable USACE project and/or land use and development regulations and policies.

I would like to take this opportunity to once again reiterate the USACE concern that the proposed SR 60 LRT alignment passes through and has a station tentatively sited in the Whittier Narrows Dam Basin. Whittier Narrows Dam Basin is a component of the Los Angeles County Drainage Area project, a Federal flood risk management project, which is owned in fee by the United States. Based on USACE's real estate, operations, and maintenance responsibilities for this flood risk management project land, USACE staff has identified a number of concerns about the SR 60 LRT alternative. I wish to bring these concerns to the public's and Metro's attention, in consideration of whether to select the SR 60 LRT as the Locally Preferred Alternative.

A preliminary concern with the dEIS is the limited information provided on safety risks related to locating a public transportation hub in a flood basin. As noted in the USACE letter dated September 7, 2012, USACE will require additional details about the proposed stations, especially the Santa Anita Avenue station, which would potentially be located within the Whittier Narrows Dam Basin and on a Federal flowage easement in order to provide detailed feedback informing the feasibility of siting the facility on Federal lands. Additional details must include the anticipated location of the proposed Santa Anita Avenue station parking structure and the access roads. The dEIS does not provide sufficient detail to understand whether there the SR 60 LRT alignment will result in safety concerns. For example, during flood events, transit riders who parked at the Santa Anita Avenue station might not be able to access their vehicles, even

with an elevated parking structure. Riders might also be stranded at the proposed Shops at Montebello and Peck Road stations if the Santa Anita Avenue station must be bypassed due to flood events. Although the location of Santa Anita Avenue station within a flowage easement and portions of Whittier Narrows is listed in the dEIS as an area of controversy, USACE is concerned with the lack of resolution to this stated controversy within the dEIS.

I also note that the description of compliance with Federal flood risk management laws and policies in this dEIS, while helpful to provide the public with a general understanding, would not be sufficient to meet USACE standards. Based on the dEIS, USACE staff cannot conclude at this time that there is no feasible alternative outside the floodplain, as required by Executive Order 11988. For example, the Washington Boulevard alternative might be considered a practicable alternative outside a floodplain. In addition, the dEIS does not address the practicability of locating the Santa Anita Avenue station outside a floodplain. Further, the Public Notice Early Notice of Proposed Project to be Located in a Floodplain (dated August 22, 2014) states that the SR 60 LRT alternative could avoid the flood basin if moved one and a quarter miles or more to the north or south, which could be considered inconsistent with the conclusions of the dEIS.

Finally, I note that the dEIS includes a limited explanation of the necessary approvals required from USACE for the SR 60 LRT alignment under the Rivers and Harbors Act of 1899, Section 14 (33 U.S.C. § 408) ("Section 408"), which requires USACE approval for alterations, modification, occupation or use of USACE constructed water resources development projects and associated lands. In the event that the SR 60 LRT alignment is selected as the Locally Preferred Alternative, Federal law and policy dictates that further analysis must be conducted prior to a USACE decision for construction on Federal flood risk management property, such as the Whittier Narrows Dam Basin. Although the dEIS lists some of these laws and policies, and provides some details on their requirements, the analysis in the dEIS and various appendices is not sufficient for USACE to conclude at this time that the SR 60 LRT alignment could be approved by USACE. The reference to USACE finding the SR 60 LRT alignment to be generally acceptable is premature, and any such statement made by USACE staff does not suggest USACE would necessarily find the proposed project acceptable under the Section 408 requirements. Therefore, if this alignment is recommended as the Locally Preferred Alternative, Metro will be required to submit a formal Section 408 request to USACE, at which time USACE will require additional details on the plans, and may have further comments at that time. As noted in the dEIS, any use or occupation of Federal flood risk management project land will be contingent upon USACE permission under Section 408, among other necessary approvals. Also please note that "Reservoir Regulation" is a section in the USACE Los Angeles District Engineering Division, rather than a description of USACE regulations.

Please also be advised that USACE would likely be required to produce its own NEPA document prior to providing any approval to use Federal land for the purposes described in this dEIS.

I would like to once again thank you for the opportunity to work cooperatively with Metro in evaluating the proposed Eastside Transit Corridor Phase 2 Project. We look forward to continuing to work with Metro on the project. If you have any questions regarding my comments or USACE's role in this project, please contact Phil Serpa at 213.452.3402 or via e-mail at phillip.j.serpa@usace.army.mil.

Sincerely,

Robert W. Colangelo
Deputy Chief, Asset Management Division

Elected Officials

City of Rosemead

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September 18, 2014

Laura Cornejo, Director County-wide Planning
Los Angeles County Metropolitan Transportation Authority
One Gateway Plaza, MS 99-22-2
Los Angeles, CA 90012

Dear Ms. Cornejo:

After reviewing the Draft Environmental Impact Report for the Eastside Extension of the Gold Line project, I would like to bring to Metro's attention certain issues that are not covered by the EIR and would have significant impacts on the project.

1. In EIR's analysis of the Montebello Town Center station, Metro should consider the potential updated zoning of the San Gabriel Blvd/60 Freeway corridor. The City of Rosemead is considering designating the location as a high-intensity hotel/commercial area. This change would increase travel and tourism opportunities along the 60 freeway corridor and would increase ridership numbers for the SR-60 route.
2. Further, for the Montebello Town Center station, potential conversion and addition of mixed-use development (spurring further TOD opportunities) and land for parking structures are readily available. These considerations should be addressed and considered in Metro's ridership calculations.
3. The Washington Blvd alignment at aerial and at-grade levels would permanently degrade and damage commercial businesses along the route, that financial and quality of life impact should be included in the EIR and fully researched.

I hope Metro considers this issues and presents a strong and well-researched analysis on these issues. I look forward to having a chance to state my positions on the Eastside alignment to the Metro board when the time comes for a final alignment to be chosen.

Respectfully,

Steven Ly
Councilman
sly@cityofrosemead.org

City of Whittier
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October 14, 2014

Laura Cornejo
Director, Countywide Planning
Los Angeles County Metropolitan Transportation Authority
One Gateway Plaza, MS 99-22-2
Los Angeles, CA 90012

Dear Ms. Cornejo:

Re: Eastside Transit Corridor Phase 2 – Washington Boulevard SUPPORT

On behalf of the Whittier City Council, I am writing to express my support and the entire Council's support of the Gold Line Washington Boulevard Extension.

In my 10 years as a City Council Member and another 14 years serving on local elected school boards, the light rail extension is one of the most exciting projects I have encountered, a project that could have immeasurable benefits to the City of Whittier, as well as the other cities along this route, in terms of business development and transportation service for our residents.

At two separate Whittier Chamber of Commerce events, I received over 50 comment cards from local business people, who see the Washington Boulevard Extension as a way to bring both customers and employees into Whittier and strengthen our economic base.

In addition, as the Washington route would terminate near Whittier's largest intersection ("Five Points"), it would also provide for good dispersal of traffic for those coming into Whittier for employment or other business. This location has great potential for Transit Orientated Development (TOD) and is adjacent to Whittier's largest employer, PIH Health, and within easy access to the former Fred C. Nelles State School site, for which major development is planned. This location would also provide an ideal link to Orange County along the Union Pacific Railroad line along Lambert Road for Phase III of your extension eastward.

The Whittier City Council has unanimously passed a resolution supporting the Washington Boulevard Extension, noting, in part, that "Whittier is committed to providing its residents with alternative modes of transportation", and reiterating the benefits to our City and all cities along this route that are detailed above.

Thank you for your consideration.

Sincerely,

Cathy Warner
Mayor

City of Whittier

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October 14, 2014

Laura Cornejo
Director, Countywide Planning
Los Angeles County Metropolitan Transportation Authority
One Gateway Plaza, MS 99-22-2
Los Angeles, CA 90012

Dear Ms. Cornejo:

Re: Eastside Transit Corridor Phase 2 – Washington Boulevard SUPPORT

I am writing to express my support of the Washington Boulevard Route for the proposed Gold Line Extension. This route has the potential to provide more benefits to residents along the entire route than the SR-60 alignment.

In addition to City Council support, I would like to make you aware of the support of this route by the Washington Boulevard Coalition, a grassroots organization of concerned residents, transit riders and business people. They will also be contacting you to express their support. I was the Chairman of the Washington Boulevard Coalition prior to my service on the City Council and can vouch for the commitment of this network of community members to bringing light rail into Whittier. Now, as a member of the City Council subcommittee on light rail transit, I continue to support the concept of a light rail route on Washington Boulevard to connect communities.

Of the two proposed routes, Washington Boulevard has the largest number of transit dependent residents within one-half mile of a station. In comparison with the SR-60 route, Washington Boulevard has 13.5% of the population that is under 18 years (6.7% for SR-60); 15.1% of those 65 years and older (9.9% for SR-60); 9.7% who have no access to a personal vehicle (4.5% for SR-60); 10.5% who already use public transit (5.6% for SR-60); and 10.2% who are low-income riders (6.3% for SR-60). This is the area of greatest need for this service and the facts speak clearly in favor of the Washington Boulevard route.

The other Whittier City Council Members and I are also concerned that the SR-60 Route will merely be a commuter route ending at a park-and-ride lot, traveling one way in the morning and returning in the evening, with few riders during the off-peak hours. In contrast, the Washington Boulevard Route will serve people in both directions throughout the day as this route passes through densely populated areas and travels along key economic sites in Commerce and ends at PIH Health, the largest employer in the area.

I respectfully request your attention to the purposes for light rail and how those aims are brought to fruition on the Washington Boulevard alignment.

Sincerely,

Fernando Dutra
Mayor Pro Tem

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Assembly
California Legislature

ED CHAU
ASSEMBLYMEMBER, FORTY NINTH DISTRICT

COMMITTEES
CHAIR: HOUSING AND COMMUNITY DEVELOPMENT
BANKING AND FINANCE
JUDICIARY
LABOR AND EMPLOYMENT
RULES

SELECT COMMITTEE
CHAIR: PRIVACY

October 20, 2014

The Honorable Mayor Eric Garcetti
Chairman
Los Angeles County Metropolitan Transportation Authority (Metro)
One Gateway Plaza
Los Angeles, CA 90012-2952

Dear Chairman Garcetti:

I am writing to express my strong support for the SR-60 Alignment as the best alternative for the Eastside Transit Corridor Phase 2 project. I believe that this alignment will satisfy Metro's goals for further improving mobility for all commuters in Los Angeles County.

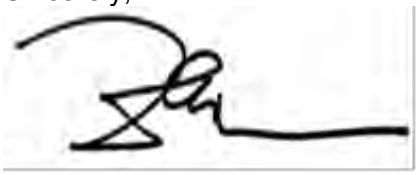
As you may know, the findings in the Draft EIR/EIS for the Eastside Transit Corridor Phase 2 project found that **"**the SR-60 LRT Alternative would have NO UNAVOIDABLE ADVERSE AFFECTS/SIGNIFICANT IMPACTS" on the environment. For this reason, the communities which I represent in the 49th Assembly District have expressed their strong support for the SR-60 LRT Alternative.

In addition, the SR-60 LRT Alternative:

- Creates more Transit Oriented Development opportunities.
- Would have a shorter construction period compared to the Washington Blvd. LRT alternative (four years compared to six years).
- Would require no eminent domain of residential units along the SR-60 LRT.
- Would have less noise impacts compared to the Washington Blvd. LRT.

In closing, as an advocate for improved transportation infrastructure for my constituents, I enthusiastically urge Metro to adopt the SR-60 Alternative as the preferred alignment for the Eastside Transit Corridor Phase 2 project. I look forward to working with you to promote sound transportation solutions for our region.

Sincerely,



ED CHAU
Assemblymember, 49th District

Cc: Art Leahy, CEO, Metro
Mayor Eric Garcetti, Chair, Metro Board of Directors
Metro Board of Directors

EC: hl

City of Whittier

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October 14, 2014

Laura Cornejo
Director, Countywide Planning
Los Angeles County Metropolitan Transportation Authority
One Gateway Plaza, MS 99-22-2
Los Angeles, CA 90012

Dear Ms. Cornejo:

Re: Eastside Transit Corridor Phase 2 – Washington Boulevard Support

As a member of the Whittier City Council, former Mayor of Whittier, and a longtime resident of Whittier, I would like to express my support of the Washington Boulevard route for the Eastside light rail extension. Support is not limited to Whittier alone – other cities which will be served by this route include La Habra Heights, La Mirada, Pico Rivera, Commerce, and Santa Fe Springs.

The Washington route has the highest overall daily ridership figures, highest overall net new riders, greatest overall user benefit hours and minimal disruption to streets due to its aerial alignment. Implementation of the Washington Boulevard Route can accommodate the aerial stations configuration with minimal impacts to community quality of life and traffic circulation. The Washington Route has a large employment base in Commerce, Pico Rivera Town Center and PIH Health, a major employer and healthcare provider in Whittier.

The Washington Boulevard Route has the potential to greatly benefit a vast number of Southeast Los Angeles County residents, by providing accessible, efficient public transportation service. With over one million additional passenger trips made over a single year above the SR-60 route, the Washington Boulevard Route offers an easy choice for the region.

Thank you for your careful consideration of the merits of the Washington Boulevard alignment.

Sincerely,

Joe Vinatieri
Council Member

City of Whittier

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October 14, 2014

Laura Cornejo
Director, Countywide Planning
Los Angeles County Metropolitan Transportation Authority
One Gateway Plaza, MS 99-22-2
Los Angeles, CA 90012

Dear Ms. Cornejo:

Re: Eastside Transit Corridor Phase 2 – Washington Boulevard Support

I am writing this letter in support of the Washington Boulevard alignment for the eastside extension of the Gold Line. As a member of the Whittier City Council and the City Council Light Rail Transit Subcommittee, I am very interested in having this light rail service come into Whittier. I am also a past President of the League of California Cities-Los Angeles County Division and see the benefit of extending light rail into this historically underserved region of Los Angeles County.

I am also the City of Whittier's representative to the Gateway Cities Council of Governments (Gateway COG), with a membership of 28 cities. The Gateway COG has voted to support the Washington Boulevard route for the Gold Line, based on the reasons discussed below.

I have attended public meetings and followed the environmental review process from its inception, so well understand the relative merits of the two alternatives being considered by Metro. The Washington Boulevard alignment clearly has the greatest benefit, not only to Whittier residents, but to the many deserving residents of other cities along the route.

I would like to call your attention to the financial aspects of the two routes. While the SR-60 alignment is cheaper to build with capital costs of $1.2-$1.3 billion compared to $1.4-$1.7 billion for the Washington alignment, these figures do not include all the environmental mitigation and property acquisition costs required to build the project. Furthermore, the Washington Boulevard alternative is expected to have a daily ridership of 19,900 compared to 16,700 on the SR-60 route. The Washington Boulevard alternative will cost approximately 25% less per user hour ($82.94 compared to $110.36).

The Washington Boulevard alternative will serve communities which are historically the most underfunded portion of the county for public transit purposes. It will enable

low income residents to reach the many employment locations along the Washington Boulevard corridor in the cities of Commerce, Montebello, Pico Rivera, Santa Fe Springs and Whittier.

Finally, the Washington Boulevard alternative avoids the costs and problems that will accompany the SR-60 route as it skirts an Environmental Protection Agency toxic landfill site, an ecologically sensitive nature preserve, and an active earthquake fault to terminate at a park-and-ride lot in a 100-year flood zone plain.

Thank you for your consideration.

Sincerely,

Owen Newcomer
Council Member

Committee on Appropriations
Subcommittee on Homeland Security
Subcommittee on Labor, Health and Human Services and Education

Democratic Senior Whip

Congressional Hispanic Caucus Healthcare Task Force Chair

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October 20, 2014

Mayor Eric Garcetti
Chair, Board of Directors
Metro
One Gateway Plaza
Los Angeles, CA 90012-2952

Dear Mayor Garcetti:

I write to express my strong support for the Washington Boulevard Alternative (Washington Route) of the Metro Gold Line Eastside Extension Transit Corridor Phase II project.

While the other alternative being considered has certain benefits, the Washington Route would serve a larger population of public transit users. Specifically, the Washington Boulevard alignment is the longer of the two proposals at 9.3 miles with six proposed stations. As such, it has the potential to serve 3000 more daily riders and one million more riders per year overall than the competing proposal.

The Washington Boulevard alignment also offers an opportunity for intermodal connectivity to Orange County, relieving cross-county arterial congestion. Given that the proposed route parallels the I-5 Freeway, it will also provide a mass transit option for daily commuters who make use of that freeway.

Lastly, the Washington Route provides access to the highest existing and future employment density, as well as the highest existing and future population density. This route features station locations that are within easy walking distance from both high-density housing and large to medium-size industrial facilities.

For these reasons, I strongly support the Washington Boulevard Alternative. This route offers a better opportunity to improve the quality of life for a greater number of people by allowing them to travel further and in a more efficient manner. Once the route is finalized, and the project has received the necessary federal approvals, I look forward to working with Metro to help secure the necessary funding for the project through the Federal appropriations process.

Thank you for your consideration.

Sincerely,

Lucille Roybal-Allard

LUCILLE ROYBAL-ALLARD
Member of Congress

LRA:ktc

cc: Art Leahy, Metro CEO
Metro Board of Directors

City of Whittier

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October 14, 2014

Laura Cornejo
Director, Countywide Planning
Los Angeles County Metropolitan Transportation Authority
One Gateway Plaza, MS 99-22-2
Los Angeles, CA 90012

Dear Ms. Cornejo:

Re: Eastside Transit Corridor Phase 2 – Washington Boulevard
SUPPORT

This letter is to express my strong support, both as a Council Member of the City of Whittier and as a private citizen, for the Washington Boulevard eastward extension under consideration by Metro.

Not only will this route provide human and economic benefits in the short term, it will also set the standard for public transportation use for future generations to come and have a major impact on the quality of life in Whittier. This route will also assist those coming to Whittier to attend or work at Whittier College, a prestigious private institution.

The Washington Boulevard alignment will allow Whittier and the other cities along the route to conduct transit oriented development, where housing, stores and businesses may be built near the stations to promote a no-car lifestyle. This will also have a benefit in Southeast Los Angeles County in the reduction of air pollution, as residents will be able to use public transportation as an alternate to private automobiles.

In contrast, the SR-60 route raises serious environmental concerns that could affect all of us for generations. This route traverses the Whittier Narrows Recreation area, a wildlife habitat that is home to many wild species. The potential loss of habitat or disturbance to sensitive species, such as nesting birds, could have a catastrophic effect on the environment of this very special area.

Thank you for your consideration.

Sincerely,

Bob Henderson
Council Member

Federal Agencies

United States Department of the Interior

OFFICE OF THE SECRETARY
Office of Environmental Policy and Compliance
Pacific Southwest Region
333 Bush Street, Suite 515
San Francisco, CA 94104

IN REPLY REFER:
(ER 14/0539)

Filed Electronically

21 October 2014

Ms. Laura Cornejo, Director
Countywide Planning
Los Angeles County Metropolitan
Transportation Authority
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Mr. Raymond Sukys
Office of Planning and Program Development
Federal Transit Administration, Region IX
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Ms. Mary Nguyen
Environmental Protection Specialist
Federal Transit Administration, Region IX
Los Angeles Metropolitan Office
888 S. Figueroa St., Suite 2170
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(213) 202-3960

Subject: Draft Environmental Impact Statement (DEIS) and Section 4f Evaluation; Department of Transportation (DOT), Federal Transit Administration (FTA), Eastside Transit Corridor Phase 2, Los Angeles County, CA

Dear Ms. Cornejo, Mr. Sukys, and Ms. Nguyen:

Thank you for the opportunity to comment on the Draft Environmental Impact Statement (DEIS) and Section 4f Evaluation; Department of Transportation (DOT), Federal Transit Administration (FTA), Eastside Transit Corridor Phase 2, Los Angeles County, CA. We have the following comments to assist your preparation of the Final EIS.

The project as proposed will result in the construction of a light rail transit line to connect to the Metro Gold Line Eastside Extension, linking communities farther east of Los Angeles to the regional transit network. The project area is generally bounded by Pomona Boulevard and State

Route 60 (SR-60) to the north, Peck Road and Painter Avenue to the east, Olympic and Washington Boulevards to the south, and Atlantic Boulevard to the west.

The Draft EIS includes conflicting information concerning potential impacts on federally listed species, sensitive habitat types, and wildlife corridors in the eastern half of the SR-60 Light Rail Transit (LRT) Alternative. The Draft EIS acknowledges that several species, including the federally endangered least Bell's vireo (*Vireo bellii pusillus*), southwestern willow flycatcher (*Empidonax traillii extimus*), and Nevin's barberry (*Berberis nevinii*) and the federally threatened coastal California gnatcatcher (*Polioptila californica californica*) and yellow-billed cuckoo (*Coccyzus americanus*) could occur in the vicinity of the proposed project (page 4.10-2 to 4.10-4), but concludes that habitat for most of these special status species would not be affected by the SR-60 LRT Alternative (page 4.10-8).

However, the Draft EIS later states that the SR-60 LRT Alternative would cross the Rio Hondo at Whittier Narrows, where riparian vegetation occurs, and that impacts to this riparian vegetation would occur during construction (page 4.10-10). The Draft EIS identifies a high potential for the least Bell's vireo to occur in the project area and states that the species is known to breed in riparian habitat within the project area (Appendix U page 23). The Draft EIS also states that Nevin's barberry has the potential to occur in scrub habitat south of SR-60, but that focused surveys for special-status species were not conducted (Appendix U, page 31). We recommend that focused surveys for these species occur within the project alignment and that the results of these surveys be provided for our review. Importantly, if the presence of any special-status species is confirmed, measures to avoid, minimize, and mitigate impacts to these species should be incorporated into the project and addressed in the Final EIS.

The Draft EIS also states that the SR-60 LRT Alternative would be constructed along existing roads in an aerial configuration, which would avoid creating a barrier to wildlife movement through the Puente-Chino Hills Wildlife Corridor (page 4.10-10). Potential impacts to listed and migratory birds from construction of an elevated rail line powered by electrified overhead wires within a known wildlife movement corridor are not adequately addressed in the Draft EIS. We recommend that the potential effects of the project on bird movement within the Puente-Chino Hills Wildlife Corridor be analyzed and that the project incorporate appropriate measures, such as fine mesh fencing along the elevated rail line, to minimize bird mortality in this area. Information to address this concern should also be included in the Final EIS.

We appreciate the opportunity to comment on the Draft EIS and to participate in the transportation planning process. If you have any questions regarding this letter, please contact Sally Brown of the Carlsbad Fish and Wildlife Office at 760-431-9440, extension 278.

Sincerely,

Patricia Sanderson Port
Regional Environmental Officer

cc: OEPC OEPC-Staff Contact: Lisa Chetnik Treichel, (202) 208-7116; Lisa_Treichel@ios.doi.gov
Sally Brown, Carlsbad Fish and Wildlife, (760) 431-9440 extension 278, Sally_Brown@fws.gov

Local Agencies

October 21, 2014

Ms. Laura Cornejo, Director
Countywide Planning
Los Angeles County Metropolitan Transportation Authority
One Gateway Plaza, MS 99-22-2
Los Angeles, CA 90012

Dear Ms. Cornejo:

DRAFT ENVIRONMENTAL IMPACT STATEMENT / ENVIRONMENTAL IMPACT REPORT (DRAFT EIS/EIR)
EASTSIDE TRANSIT CORRIDOR PHASE 2 PROJECT
COUNTY OF LOS ANGELES DEPARTMENT OF PUBLIC WORKS COMMENTS

Thank you for the opportunity to review the Draft EIS/EIR associated with the Eastside Transit Corridor Phase 2 project. The overall goal of the project is to improve mobility, accessibility, and connectivity to the regional transit system by extending the Metro Gold Line Eastside Extension (MGLEE) to the east by 6.9 to 9.5 miles. Alternatives studied in the Draft EIS/EIR include a No Build Alternative, a Transportation System Management (TSM) Alternative, and two light rail transit (LRT) build alternatives: the State Route 60 (SR 60) LRT Alternative and the Washington Boulevard LRT Alternative. The proposed build alternatives would terminate near SR60/Peck Road or Washington Boulevard and Lambert Road. The project covers over 50 square miles to the east and southeast of downtown Los Angeles. It includes portions of the cities of Commerce, Los Angeles, Montebello, Monterey Park, Pico Rivera, Rosemead, Santa Fe Springs, South El Monte, Whittier, and portions of unincorporated Los Angeles County, which include East Los Angeles and West Whittier-Los Nietos.

The following County of Los Angeles, Department of Public Works comments are for your consideration and relate to the environmental document only:

For specific revisions, additions, or deletions of wording directly from the project document, the specific section, subsection, and/or item along with the page number is first referenced then the excerpt from the document is copied within quotations using the following nomenclature:

> Deletions are represented by a ~~strikethrough~~.
> Additions are represented by *italics* along with an underline.
> Revisions are represented by a combination of the above.

1. It is requested that the project proponent continue exploring ways to mitigate significant impacts at the impacted intersections. If no further mitigations are feasible, we would like the opportunity to review the project's Statement of Overriding Considerations when available.

For questions regarding comment No. 1, please contact Andrew Ngumba of Public Works' Traffic and Lighting Division at (626) 300-4851 or angumba@dpw.lacounty.gov.

2. Depending on the LRT Alternative selected, the proposed project may have impacts to unincorporated County Communities of East LA, South San Gabriel and West Whittier-Los Nietos. As indicated in chapter 2, Alternatives Considered, the alternative analysis process included an initial technical analysis and community and public agency feedback gathered at meetings and public workshops. Appendix I, Agency Coordination and Public Involvement, details the extensive outreach that has taken place over the years at different cities' forums; however none of these public meetings/workshops have taken place in East Los Angeles or West Whittier-Los Nietos. We request additional outreach be conducted to include residents of these three unincorporated area communities before a preferred alternative is selected.

3. As proposed, the Washington Boulevard LRT Alternative is to operate in an aerial configuration with columns located in the roadway median or sidewalks, as well as an at-grade street running configuration, where the streets widths are sufficient to accommodate the alignment and proposed six stations. Five of the proposed stations include supporting park-and-ride facilities; except one at Garfield Avenue north of Whittier Boulevard. Whittier Boulevard is a business district; loss of parking leads to loss of business revenue. We request consideration of a park-and-ride facility for this proposed station to mitigate the loss of on-street parking.

4. The Washington Boulevard LRT Alternative proposes a station east of Norwalk Boulevard. The Draft EIS/EIR should discuss and explore the need for a signal at the intersection at Boer Avenue as it will serve as a passenger landing area.

5. Noise intensity tests need to be completed to include all schools, churches and other community centers adjacent to the proposed alignment along Washington Boulevard in Unincorporated West Whittier-Los Nietos. We noticed that the Santa Fe Kids Company located at 11304 Washington Boulevard was not a receptor included in the noise intensity assessment and needs to be.

6. Both build alternatives would have unavoidable adverse effects/significant impacts on visual and aesthetic resources. The EIR/EIS should identify measures that will partially if not fully mitigate the aesthetic and visual impacts.

7. A small portion of the County's El Sol bus route is affected by the two possible build alternatives. The Draft EIS/EIR should discuss the impacts of the LRT Alternatives on the operations of the El Sol route and identify mitigation as necessary. In addition, Public Works needs to be contacted during construction so that coordination can occur and any impacts to the El Sol bus route can be eliminated/minimized.

8. The County has several active projects along both proposed LRT alignments. All projects are in the design phase and are scheduled to start construction at the beginning of Fiscal Year 2016-2017. The Draft EIS/EIR should discuss all active Public Works projects that the Gold Line Extension Project will need to take into account. Please contact Ms. Bella Hernandez of Public Works' Programs Development Division at (626) 458-5926 or bhernan@dpw.lacounty.gov to obtain a list of active projects and the scope of work associated with each one. Please note that if either LRT Alternative is selected, design plans should include all currently contemplated road improvement projects, including proposed bike lanes, built after certification of the EIR.

9. The SR60 LRT Alternative will cross over the Rio Hondo Bike trail. We understand that with the employment of mitigation measures there will only be temporary construction impacts that will be less than significant. Public Works needs to be contacted during construction so that coordination can occur and any impacts to the bike trail and/or channel can be eliminated/minimized.

10. The Washington Blvd LRT Alternative will cross through two existing class III bike routes crossing Washington Blvd at Norwalk Blvd and Broadway Avenue. We understand that with the employment of mitigation measures there will only be temporary impacts to these bikeways. Public Works needs to be contacted during construction so that coordination can occur and any impacts to the bikeways can be eliminated/minimized.

For questions regarding the comment Nos. 2 through 10, please contact Bella Hernandez of Public Works' Programs Development Division at (626) 458-5926 or bhernan@dpw.lacounty.gov.

11. An evaluation of the project alternatives utilizing the Institute of Sustainable Infrastructure (ISI) Envision Rating System should be completed and disclosed in the document so that reviewers can evaluate the sustainability of each option and add/suggest features to enhance the benefits of the project.

12. The Washington Boulevard LRT Alternative involves having the light rail train alignment cross over the San Gabriel River using the existing bridge. The bridge currently consists of four lanes, with a double yellow line running down the middle. The bridge may need to be widened and its load-carrying and seismic capacities upgraded in order to accommodate the light-rail vehicles and associated infrastructure (rails, ballast, power poles and lines, etc.). Discussion in this regard should be included in the Draft EIS/EIR.

13. The Draft EIS/EIR should discuss the need for and the associated impacts of any required storm drain relocation along the various affected roadways as a result of the proposed project. Please note that some of the existing storm drains are located along the center of the affected roadways.

14. The Draft EIS/EIR should discuss the need for track drainage and the intended method to be used to prevent storm runoff concentrated flow from being conveyed across intersections. Please note that intersections may need to be reconstructed to meet the intended design criteria for grade breaks and cross slopes.

15. The Draft EIS/EIR should discuss the need for cross slopes to be evaluated to determine if roadway pavement reconstruction is required to achieve intended cross slopes. An alternative to pavement reconstruction would be to replace any existing 8-inch curb faces with 6-inch curb faces, similar to what was performed for the ELRT-Phase 1 project. Under this scenario, pavement resurfacing and sidewalk reconstruction would be required.

16. The document should indicate approximately how much roadway reconstruction will be necessary to accommodate station locations along Washington Boulevard at Norwalk Boulevard and Lambert Road. The construction footprint for roadway work, at MTA's cost, should encompass a significant length of roadway along Washington Boulevard.

17. The document should discuss the need for tree removals in existing medians and/or along parkway areas and disclose that replacement trees will be provided.

For questions regarding the comment Nos. 11 through 17, please contact Dave Diotalevi of Public Works' Design Division at (626) 458-7802 or ddiotale@dpw.lacounty.gov.

18. Executive Summary, Introduction, page ES-1: The wording of the first paragraph gives the false impression to the reader that the metro gold line will be extended to the cities of Santa Monica, Culver City, and the University of Southern California. A suggested modification for this paragraph is shown below:

> "The Eastside Transit Corridor Phase 2 Project is a vital public transit infrastructure investment that would provide a transit connection to the existing Metro Gold Line Eastside Extension and link communities on the eastern side of the County of Los Angeles. With the implementation of the Regional Connector Transit Corridor project, the Metro Gold Line Eastside Extension will directly connect to the Metro Expo Line and will ~~be operating light rail trains between~~ *provide users with options to connect to* Santa Monica, Culver City, University of Southern California (USC), downtown Los Angeles, and the Eastside by 2020, improving mobility within the project area and offering more sustainable transit alternatives. Figure ES-1 shows the regional Metro Rail lines expected to be operational by the year 2035, and illustrates how the Eastside Transit Corridor Phase 2 Project would extend the existing Metro Gold Line Eastside Extension."

19. Executive Summary, Table ES-2, Summary of Impacts and Mitigation Measures for each of the Project Alternatives, page ES-65: A typo exists on this page and should be corrected as follows:

> "However, the downtown Los Angeles skyline is only visible ~~form~~ *from* Washington Boulevard on clear days. Vistas of the San Gabriel Mountains and Puente Hills to the north and east, respectively, would not be substantially obstructed during construction. Construction activities may temporarily alter the visual character along ~~the corridor of~~ the corridor for a limited duration."

20. The two column format of the Draft EIS/EIR is not conducive nor ergonomically optimized for a paper-less review. One needs to scroll up and down in order to read each page. It is recommended that the Draft EIS/EIR be reformatted for better readability.

21. Metro is reminded to engage in early and frequent consultation with the Los Angeles County Department of Public Works regarding any and all specific real estate transactions involving Los Angeles County Flood Control District and/or the County of Los Angeles Department of Public Works necessitated by the proposed project(s), including but not limited to permits, construction easements, ingress/egress easements, alternative easement rights, drainage easements, road easements, slope easements, sight and air rights, and other impacts to public rights of way owned by either of the two noted entities.

For questions regarding comment Nos. 18 through 21, please contact Robin Phillips of Public Works' Survey/Mapping and Property Management Division at (626) 458-7048 or rphillip@dpw.lacounty.gov.

22. The environmental document should note that any construction, demolition, or grading projects in the County's unincorporated areas are required to recycle or reuse a minimum of 50 percent of the construction and demolition debris generated by weight per the County's Construction and Demolition Debris Recycling and Reuse Ordinance. A Recycling and Reuse Plan must be submitted to and approved by the Environmental Programs Division of the County of Los Angeles Department of Public Works before a construction, demolition, or grading permit may be issued.

For questions regarding comment No. 22, please contact Chris Sheppard of Public Works' Environmental Programs Division at (626) 458-5163 or csheppard@dpw.lacounty.gov.

23. The document should disclose the amount of earthwork (cut fill, over-excavation) proposed for each of the considered alternatives. In addition, the amount of any proposed import or export would need to be stated along with the intended haul routes.

If you have questions regarding comment No. 23 or require additional information, please contact Matthew Dubiel of Public Works' Land Development Division at (626) 458-4921 or mdubiel@dpw.lacounty.gov.

MD:

Los Angeles County
Metropolitan Transportation Authority

One Gateway Plaza
Los Angeles, CA 90012-2952

213.922.2000 Tel
metro.net

Metro

William T. Fujioka
Los Angeles County Chief Executive Office
713 Kenneth Hahn Hall of Administration, 500 W Temple St
Los Angeles, CA 90012

Re: Draft Environmental Impact Statement/Environmental Impact Report for the Eastside Transit Corridor Phase 2 Project-Available for Review

Dear William T. Fujioka:

Thank you for your continued involvement in the Eastside Transit Corridor Phase 2 Project (Project). The Federal Transit Administration (FTA) in cooperation with the Los Angeles County Metropolitan Transportation Authority (LACMTA) has prepared a Draft Environmental Impact Statement/Environmental Impact Report (EIS/EIR) for the proposed project in accordance with the National Environmental Policy Act (NEPA) and the California Environmental Quality Act (CEQA). We are now seeking comments on the Draft EIS/EIR for the Project and have provided instructions below.

The overall goal of the project is to improve mobility, accessibility and connectivity to the regional transit system by extending the Metro Gold Line Eastside Extension (MGLEE) to the east by 6.9 to 9.5 miles. Alternatives studied in the Draft EIS/EIR include a No Build Alternative, a Transportation System Management (TSM) Alternative, and two light rail transit (LRT) build alternatives: the State Route 60 (SR 60) LRT Alternative and the Washington Boulevard LRT Alternative. Depending on which alternative is selected, the proposed project would implement an LRT project that would extend the MGLEE from the existing Atlantic Station to the east by 6.9 to 9.5 miles. The proposed build alternatives would terminate near SR 60/Peck Road or Washington Boulevard and Lambert Road. The Project area covers over 50 square miles to the east and southeast of downtown Los Angeles. It includes portions of the cities of Commerce, Los Angeles, Montebello, Monterey Park, Pico Rivera, Rosemead, Santa Fe Springs, South El Monte, Whittier, and portions of unincorporated Los Angeles County, which include East Los Angeles and West Whittier-Los Nietos.

Enclosed is the Notice of Availability (NOA) announcing that the Draft EIS/EIR is available for your review. You are invited along with the public to submit comments on the Draft EIS/EIR in writing or electronically by e-mail during the 60-day comment period from August 22, 2014 through October 21, 2014. Written and electronic comments may be submitted to:

Ms. Laura Cornejo
Los Angeles County Metropolitan Transportation Authority
One Gateway Plaza, MS 99-22-2
Los Angeles, CA 90012

or via e-mail to eastsidephase2@metro.net. You are also invited to submit comments in person at one of four public hearings or the public agency meeting, which will be held at the following times and locations:

- **Public Agency Meeting: Monday, September 8, 2014, 10am – 12pm,** Metro Headquarters, Union Station Room, 3rd Floor, One Gateway Plaza, Los Angeles, CA 90012

- **Saturday, September 27, 2014, 9am -11:30am,** Open House 9am, Public Hearing 9:30am to 11:30am, Pico Rivera Senior Center, 9200 Mines Ave, Pico Rivera, CA 90660

- **Monday, September 29, 2014, 5:30pm – 8pm,** Open House 5:30pm, Public Hearing 6pm to 8:00pm, Quiet Canon Banquet Center, 901 Via San Clemente, Montebello, CA 90640

- **Tuesday, September 30, 2014, 5:30pm – 8pm,** Open House 5:30pm, Public Hearing 6pm to 8:00pm, Uptown Whittier Senior Center, 13225 Walnut Street, Whittier, CA 90602

- **Wednesday, October 1, 2014, 5:30pm – 8pm,** Open House 5:30pm, Public Hearing 6pm to 8:00pm, South El Monte Senior Center, 1556 Central Avenue, South El Monte, CA

If you have questions regarding this letter or the enclosed NOA, please contact Ms. Laura Cornejo at the address listed above.

Sincerely,

Diego Cardoso
Executive Officer

Enclosure:
Notice of Availability

cc: Federal Transit Administration

LOS ANGELES COUNTY
METROPOLITAN TRANSPORTATION AUTHORITY
(METRO)

NOTICE OF AVAILABILITY FOR THE EASTSIDE TRANSIT CORRIDOR PHASE 2 PROJECT DRAFT ENVIRONMENTAL IMPACT STATEMENT/ENVIRONMENTAL IMPACT REPORT

To comply with the National Environmental Policy Act (NEPA) and the California Environmental Quality Act (CEQA) Section 15087, the Federal Transit Administration (FTA) and the Los Angeles County Metropolitan Transportation Authority (Metro) have prepared a Draft Environmental Impact Statement/Environmental Impact Report (EIS/EIR). This Notice of Availability serves as a notice to the public regarding the availability of the environmental document and seeks public opinion and comment. FTA is the lead agency for the purposes of NEPA, and Metro is the lead agency for the purposes of CEQA.

Project Description and Location

The Eastside Transit Corridor Phase 2 Project (Project) area covers over a 50 square mile area to the east and southeast of downtown Los Angeles. It includes portions of the cities of Commerce, Los Angeles, Montebello, Monterey Park, Pico Rivera, Rosemead, Santa Fe Springs, South El Monte, Whittier, and portions of unincorporated Los Angeles County, including East Los Angeles and west Whittier-Los Nietos. An optional maintenance yard is located in the city of Los Angeles.

The Draft EIS/EIR discusses the purpose and need for the project and identifies and evaluates proposed transit improvement alternatives. The following four alternatives were evaluated in the Draft EIS/EIR: No Build, Transportation Systems Management (TSM), and two build alternatives utilizing Light Rail Transit (LRT) technology: the State Route 60 (SR 60) LRT Alternative and the Washington Boulevard LRT Alternative.

Depending on the selected alternative , the Project would extend the existing Metro Gold Line Eastside Extension (MGLEE) LRT system from its current terminus at the Atlantic Station to the east by 6.9 to 9.5 miles to either Peck Road in the city of South El Monte or Lambert Road in the city of Whittier.

The SR 60 LRT Alternative would extend the MGLEE approximately 6.9 miles east to Peck Road. The majority of this alignment would operate in an aerial configuration, primarily within Caltrans right-of-way (ROW) along the southern portion of the SR 60 Freeway. This alternative includes the following four stations, each with supporting park-and-ride facilities: Garfield Avenue station at Garfield Avenue and Via Campo; Shops at Montebello station located on the west end of currently private property adjacent to the Shops at Montebello; Santa Anita Avenue station located on the south side of the SR 60 Freeway to the east of Santa Anita Avenue; and the Peck Road station located within Caltrans ROW to the east of Peck Road.

This LRT system would also include traction powered substation (TPSS) sites, pocket tracks, switches, tail tracks, and other ancillary facilities. One potential new maintenance site location the Mission Junction Maintenance Yard Option, is located in the city of Los Angeles northwest of Cesar Chavez Avenue and Mission Road. A maintenance yard currently under construction in the city of Monrovia is also an option to be the maintenance yard that would service this line.

The SR 60 North Side Design Variation, is an option for this alternative. With this variation, the LRT alignment would transition from the south-side to the north-side of the SR 60 Freeway just west of Greenwood Avenue, continue east along the north-side of the SR 60 Freeway within Caltrans ROW, and return to the south-side of SR 60 Freeway approximately one-quarter mile west of Paramount Boulevard.

The Washington Boulevard LRT Alternative would extend the MGLEE approximately 9.5 miles east to the city of Whittier at Lambert Road. This alternative is proposed to operate in an aerial configuration with columns located in the roadway median or sidewalks, as well as in an at-grade street running configuration, where the street widths are sufficient to accommodate the alignment and proposed stations. The proposed alignment would use Pomona Boulevard, the south-side of the SR 60 Freeway within Caltrans ROW, Garfield Avenue, and Washington Boulevard, and include six new stations located at: Garfield Avenue and Via Campo; Whittier Garfield Avenue and Whittier Boulevard; Washington Boulevard and Greenwood Avenue; Washington Boulevard and Rosemead Boulevard; Washington Boulevard and Norwalk Boulevard; and Washington Boulevard and Lambert Road. All of these stations, except the Whittier Boulevard station, include supporting park-and-ride facilities.

This LRT system also includes TPSS sites, pocket tracks, switches, tail tracks, and other ancillary facilities. Three potential sites have been identified for the location of a new maintenance yard: Mission Junction Maintenance Yard Option (adjacent to the existing Mission Junction maintenance facility); Commerce Maintenance Yard Option in the city of Commerce; and the Santa Fe Springs Maintenance Yard Option in the city of Santa Fe Springs. Another maintenance yard currently under construction in the city of Monrovia, is also an option to be the maintenance yard that would service this line.

Two design variations are also being considered for the Washington Boulevard LRT Alternative. Under the first design variation, the alignment would be grade separated at Rosemead Boulevard. The second design variation would include an aerial crossing over the San Gabriel River/I-605 and a grade separation at Pioneer Boulevard compared to the original street running configuration in this area.

Public Review and Comment Period

The public review and comment period for the Draft EIS/EIR shall begin on August 22, 2014 and last for 60 days, ending on October 21, 2014. All public comments must be received by 5:00PM on October 21, 2014. During this time, agencies and members of the public may submit comments on the Draft EIS/EIR to:

Ms. Laura Cornejo, Director
Countywide Planning
Los Angeles County Metropolitan Transportation Authority
One Gateway Plaza, MS 99-22-2
Los Angeles, CA 90012
e-mail: eastsidephase2@metro.net

Comments may also be submitted at public hearings, which will be held at the following times and locations:

- Saturday, September 27, 2014; Open House 9am, Public Hearing 9:30 a.m. to 11:30 a.m. at the Pico Rivera Senior Center, 9200 Mines Avenue, Pico Rivera, CA 90660
- Monday, September 29, 2014; Open House 5:30pm, Public Hearing 6:00 p.m. to 8:00 p.m. at the Quiet Cannon Banquet Center, 901 Via San Clemente, Montebello, CA 90640

- Tuesday, September 30, 2014; Open House 5:30pm, Public Hearing 6:00 p.m. to 8:00 p.m. at the Uptown Whittier Senior Center, 13225 Walnut Street, Whittier, CA 90602
- Wednesday, October 1, 2014; Open House 5:30pm, Public Hearing 6:00 p.m. to 8:00 p.m. at the South El Monte Senior Center, 1556 Central Avenue, South El Monte, CA 91733

The buildings used for the public hearings are accessible to persons with disabilities. Any individual who requires special assistance, such as a sign language interpreter, to participate in the scoping meeting should contact Mr. Dave Hershenson, Community Relations Manager, Metro, at (213) 922-1340, or hershensond@metro.net.

For more information regarding the Draft EIS/EIR or to request a copy, please contact Ms. Laura Cornejo at the address above or:

Ms. Mary Nguyen, Environmental Protection Specialist
Federal Transit Administration
888 South Figueroa Street, Suite 2170
Los Angeles, CA 90017
e-mail: mary.nguyen@dot.gov

Upon conclusion of the selection of the locally preferred alternative (LPA), the Metro Board may select to initiate a Final EIR. Initiation of a Final EIS or the FTA's participation is contingent upon having funding in place. The Final EIS/EIR will include and address all of the comments received during the Draft EIS/EIR public review period. Issuance of the Final EIS/EIR will depend on Metro's ability to develop a constrained financial plan which demonstrates construction initiating within three years after issuance of the Record of Decision (ROD), the time frame by which information within an EIS/EIR is still valid. The project is currently included within the constrained component of Metro's Long Range Transportation Plan and the 2012-2035 Regional Transportation Plan, which commit funding to the project starting in 2026 with construction anticipated between 2027 and 2035 and operations in 2035.

Significant Environmental Effects

The Draft EIS/EIR addresses the existing conditions and environmental setting in the project area. Based on guidance contained in NEPA and CEQA, the Draft EIS/EIR studied the potential

environmental consequences associated with construction and operation of the project alternatives. After implementation of mitigation measures, the SR 60 LRT Alternative would have no unavoidable adverse effects under NEPA and no unavoidable significant impacts under CEQA. After implementation of mitigation measures, the Washington Boulevard LRT Alternative would have unavoidable adverse effects/significant impacts in the following four areas: visual and aesthetic resources (NEPA and CEQA), community and neighborhoods (NEPA only), surrounding intersections (NEPA and CEQA), and cumulative impacts (NEPA and CEQA).

Section 4(f) Findings

In compliance with 23 CFR 774 this notice also serves as a public notice and an opportunity for public review and comment concerning the effects on the protected activities, features, or attributes of the Section 4(f) resources (recreational ,natural, and historic resources) potentially affected in the project area. The LRT alternatives would not result in the use of any historic properties protected by Section 4(f). As discussed in Chapter 5, Section 4(f) Evaluation of the Draft EIS/EIR, the LRT alternatives would result in de minimis impacts that would not substantially affect the recreational activities, features, or attributes that make the property eligible for Section 4(f) protection.

Ways to Obtain the Draft EIS/EIR

The Draft EIS/EIR will be distributed on Metro's website at http://www.metro.net/projects/eastside_phase2/. CDs and paper copies of the Draft EIS/EIR may be requested from Ms. Laura Cornejo at the address shown above. Paper copies of the Draft EIS/EIR will also be available for public viewing at the public hearings and at the following depositories:

Commerce Public Library 5655 Jillson Street Commerce, CA 90040	Pico Rivera Public Library 9001 Mines Avenue Pico Rivera, CA 90660	Los Nietos County Library 11644 East Slauson Avenue Whittier, CA 90606
East Los Angeles County Library 4837 East 3rd Street Los Angeles, CA 90022	Rivera County Library 7828 Serapis Avenue Pico Rivera, CA 90660	Sorensen County Library 6934 Broadway Avenue Whittier, CA 90606

Chet Holifield County Library
1060 South Greenwood Avenue
Montebello, CA 90640

Montebello Public Library
1550 West Beverly Boulevard
Montebello, CA 90640

Monterey Park Public Library
318 South Ramona Avenue
Monterey Park, CA 91754

Rosemead City Library
8800 Valley Boulevard
Rosemead, CA 91770

Santa Fe Springs Public Library
11700 Telegraph Road
Santa Fe Springs, CA 90670

South El Monte City Hall
Reception Desk
1415 N. Santa Anita Avenue
South El Monte, CA 91733

Whittier Public Library
7344 Washington Avenue
Whittier, CA 90602

Whittwood Branch Library
10537 Santa Gertrudes Avenue
Whittier, CA 90603

South El Monte Library
1430 North Central Avenue
South El Monte, CA 91733

Sites Enumerated Under Section 65962.5 of the Government Code

The Eastside Transit Corridor Phase 2 Project is located on sites enumerated under Section 65962.5 of the Government Code (which requires identifying certain hazardous sites). The following sites enumerated under Section 65962.5 of the Government Code are located within the boundaries of the LRT alignments and stations, as specified below.

Sites within Both LRT Alternative Alignments

- Texaco Service Station: 892 Garfield Ave, Montebello, CA 90640; LUST; two cases both completed - cases closed.

Sites within SR 60 LRT Alternative and/or North Side Design Variation Alignment

- San Gabriel Valley Superfund Site – South El Monte and Whittier Narrows Operable Units (OU); city of South El Monte and Whittier Narrows; EnviroStor and CERCLIS; Region-wide USEPA Superfund site with volatile organic compound (VOC)-impacted groundwater beneath the SR 60 Freeway.
- Semou Shallow-Zone Extraction: SR 60 Freeway at Rosemead Blvd., South El Monte, CA 91733, cleanup program site; open site assessment.
- Mobil #18-EQO; 1220 N. Peck Rd., South El Monte, CA 917334524; LUST; completed and case is closed.

- Former Shell Station #204-7389-0232: 1130 N. Peck Rd., South El Monte, CA 91733; LUST, HIST, and Cortese; gasoline and diesel leak affecting groundwater; open case remediation; a second case with gasoline leak affecting groundwater is a closed case.

Sites within Washington Boulevard LRT Alternative Alignment

- AMPT Montebello Inc.:500 Garfield Ave., Montebello, CA 90640; LUST; case is closed
- California Target #100: 869 Washington Blvd., Montebello, CA 90640; LUST, HIST, and Cortese; gasoline leak affecting groundwater; open site assessment.
- Chevron #9-7441: 12376 Washington Blvd., Whittier, CA 90606; LUST; completed case is closed.
- American Medical Enterprises: 12508 E. Lambert Rd., Whittier, CA 90606; LUST, HIST, and Cortese; waste oil leak affecting groundwater; case is open and under remediation.
- Omega Chemical Superfund Site: 12504 E. Whittier Blvd., Whittier, CA 90606; EnviroStor; USEPA Superfund site with VOC impacted groundwater beneath Washington Blvd.

Sites within the Santa Fe Springs Maintenance Yard

- Delta Industries: 8137 Allport Ave., Santa Fe Springs, CA 90670; cleanup program site; completed and case closed.
- Sur Lite Corp.: 8124 Allport Ave., Santa Fe Spring, CA 90670; DTSC Site Type: HAZ WASTE – RCRA; non-operating status.

COUNTY SANITATION DISTRICTS
OF LOS ANGELES COUNTY

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

GRACE ROBINSON HYDE
Chief Engineer and General Manager

October 22, 2014

Ref File No.: 3067926

Ms. Laura Cornejo
Los Angeles County
Metropolitan Transportation Authority
One Gateway Plaza, MS 99-22-2
Los Angeles, CA 90012

Dear Ms. Cornejo:

Eastside Transit Corridor Phase 2 Project

The County Sanitation Districts of Los Angeles County (Districts) received a Draft Environmental Impact Report for the subject project on August 19, 2014. We offer the following comment:

- The proposed project may impact existing and/or proposed Districts' trunk sewers over which it will be constructed. Existing and proposed Districts' trunk sewers are located directly under and/or cross directly beneath the proposed project alignment. The Districts cannot issue a detailed response to or permit construction of the proposed project until project plans and specification that incorporate Districts' sewer lines are submitted. In order to prepare these plans, you will need to submit a map of the proposed project alignment, when available, to the attention of Mr. Jon Ganz of the Districts' Sewer Design Section at the address shown above. The Districts will then provide you with the plans for all Districts' facilities that will be impacted by the proposed project. Then, when revised plans that incorporate our sewers have been prepared, please submit copies of the same for our review and comment.

  If you have any questions, please contact the undersigned at (562) 908-4288, extension 2717.

Very truly yours,

Grace Robinson Hyde

Adriana Raza
Customer Service Specialist
Facilities Planning Department

AR:ar

cc: J. Ganz

DOC: #3121022.D99

Mary Branca
Superintendent

Tim Strand
Assistant
Superintendent

East Whittier City School District

Gabriela Tavitian
Assistant
Superintendent

Richard Holash
Chief Business Officer

14535 E. Whittier Blvd., Whittier, CA 90605 • (562) 907-5900 FAX (562) 945-6062 • Website www.ewcsd.org

October 15, 2015

Laura Cornejo
Director, Countywide Planning
Los Angeles County Metropolitan Transportation Authority
One Gateway Plaza, MS 99-22-2
Los Angeles, CA 90012

Dear Ms. Cornejo:

I am writing in support of the Washington Boulevard alternative for the Metro Eastside Transit Corridor Extension. East Whittier City School District urges Metro staff to recommend and the Metro Board to select this alternative over the SR-60 option.

The Washington Boulevard alternative is a far better choice because of whom it serves, the kind of service it provides, and the ways in which the community will benefit. It is our responsibility to future generations to ensure that public transportation serves the people who need it most, uses resources wisely, and respects our fragile environment.

The Washington Boulevard alternative will carry over one million more riders per year than the SR-60 alternative, and will draw close to double the number of new riders annually. It will serve the highest number of low-income, senior, and transit-dependent households, serving communities which are historically the most underfunded for public transportation.

The Washington Boulevard route will reach people where they work, shop and live, with stations located in walking distance of their starting point and final destination. Stations will be within reach for residents and workers in Commerce, Montebello, Pico Rivera, Santa Fe Springs, Whittier, and unincorporated Los Angeles County, compared to the SR-60 route, serving primarily motorists who may park and ride for a portion of their trip.

The Washington Boulevard route provides service at a lower cost per rider and will cost about 25% less per service hour than the SR-60. Metro has the opportunity to extend a system of regional transportation that could provide an efficient transit link between southeast Los Angeles County and downtown. This light rail connection would be a gift for generations to come.

Finally, East Whittier City School District has serious concerns about the negative environmental impact of the SR-60 route. It skirts an EPA Superfund site and travels through Whittier Narrows, a cherished and ecologically sensitive part of our community. A light rail project is designed to improve the environment; it shouldn't sacrifice a delicate natural resource.

Thank you for the opportunity to comment on this important project. We look forward to the prospect of light rail coming to our community and urge you to support the Washington Boulevard alternative.

Sincerely.

Mary Branca
Superintendent

BEFORE THE BOARD OF TRUSTEES OF THE
EAST WHITTIER CITY SCHOOL DISTRICT

Los Angeles County, California

A Resolution of East Whittier City School District Stating Support For The Metropolitan Transportation Authority Eastside Transit Corridor Phase 2 Washington Boulevard Alignment

No. 15/13-14

WHEREAS, the Los Angeles County Metropolitan Transportation Authority (Metro) has released the Draft Environmental Impact Statement/Environmental Impact Report (DEIS/EIR) for the Eastside Transit Corridor Phase 2 project and will receive public comments through October 21, 2014; and

WHEREAS, the Metro DEIS/EIR evaluates two alignments from the current terminus of the Gold Line at Atlantic Boulevard and Pomona Boulevard-a Washington Boulevard option ending at PIH Health in Whittier and a SR-60 alignment ending at the I-605/Peck Road in South El Monte; and

WHEREAS, the DEIS/EIR studied potential effects of construction and operation on both alignments and identified mitigation measures to avoid or minimize adverse affects on the project; and

WHEREAS, the DEIS/EIR refined the two alternatives through the use of such environmental criteria as fiscal impact, passenger growth, safety and security, community impacts, energy use, hazardous materials, environmental justice, noise and vibration issues, land use development, historic resources, geological and soil issues, traffic effects and air quality; and

WHEREAS, the DEIS/EIR may lead to a single locally-preferred option determined by the Metro Board; and

WHEREAS, the project's intention is to improve mobility for residents within the proposed area and plan for projected population growth and future congestion issues; and

WHEREAS, the chosen alignment will impact the social-economic fabric of the District for decades to come; and

WHEREAS, District students and families would greatly benefit from access to alternative modes of transportation;

NOW, THEREFORE, BE IT RESOLVED, that East Whittier City School District Board of Education places its full support behind the Los Angeles County Metropolitan Transportation Authority Eastside Transit Corridor Phase 2 Washington Boulevard light rail alignment. The Board directs staff to work with Metro, community stakeholders, and constituents to encourage support for the Washington Boulevard alignment. The East Whittier City School District shall certify to the passage and adoption hereof.

ADOPTED this 14th day of October, by the East Whittier City School District Board of Education in Whittier, California.

President

Vice President

Clerk

Member

Member

10/14/14
Date

From: Janet Cappellanti-Adams <JCappellanti-Adams@dmh.lacounty.gov>
Sent: Thursday, October 02, 2014 1:06 PM
To: EastSidePhase2
Cc: ms.giannetta@gmail.com
Subject: Comment(s) / Enquiries

Good afternoon, Ms. Cornejo:

After reading, studying and going over the MTA pamphlet entitled, 'Help Us Plan More Transit Near You', my enquiries would be as follows, listed below:

- Is MTA planning to extend the Gold Line further south into East Los Angeles and beyond that or what else??
- Since the MTA pamphlet is entitled as such, what about other areas i.e. further eastward past the last Gold Line station stop at Sierra Madre Villa? ? Is that MTA project still going on, how far eastward will it go, where will it end and what is the status of it right now as I am emailing this communication??

Comment(s): I hope that MTA does not raise its fares again when these projects are completed since MTA just recently raised its fares anyway/anyhow. In addition, I regret that I will not be able to attend any of the public hearings since I commute via MTA public transportation. Even though the closest public hearing for me is located in the city of South El Monte, it would still not be conducive, let alone convenient, being that I reside in the city of Pasadena; by the time that the hearing would be concluded, I would be returning home too late by the time that I arrived there, (city of Pasadena). However, if MTA can inform me where I can go on its website to view the results of the public hearings, I would appreciate it; thanks.

Sincerely,
Ms. J. Cappellanti-Adams

Janet Cappellanti-Adams
Los Angeles County Department of Mental Health
Central Business Office
695 South Vermont Avenue, Suite 900
Los Angeles, CA 90005-1349
Telephone: (213) 480-3477
Fax: (213) 252-8880
Email: JCappellanti-Adams@dmh.lacounty.gov

WHITTIER UNION HIGH SCHOOL DISTRICT
Whittier, California

RESOLUTION
1415-14

A RESOLUTION OF THE BOARD OF TRUSTEES OF THE WHITTIER UNION HIGH SCHOOL DISTRICT (Board) STATING SUPPORT FOR THE METROPOLITAN TRANSPORTATION AUTHORITY, EASTSIDE TRANSIT CORRIDOR, PHASE 2, WASHINGTON BOULEVARD ALIGNMENT

WHEREAS, the Los Angeles County Metropolitan Transportation Authority (Metro) has released the Draft Environmental Impact Statement/Environmental Impact Report (DEIS/EIR) for the Eastside Transit Corridor Phase 2 project and will receive public comments through October 21, 2014; and

WHEREAS, the Metro DEIS/EIR evaluates two alignments from the current terminus of the Gold Line at Atlantic Boulevard and Pomona Boulevard—a Washington Boulevard option ending at PIH Health in Whittier and a SR-60 alignment ending at the I-605/Peck Road in South El Monte;

WHEREAS, the DEIS/EIR studied potential effects of construction and operation on both alignments and identified mitigation measures to avoid or minimize adverse effects on the project; and

WHEREAS, the DEIS/EIR refined the two alternatives through the use of such environmental criteria as fiscal impact, passenger growth, safety and security, community impacts, energy use, hazardous materials, environmental justice, noise and vibration issues, land use development, historic resources, geological and soil issues, traffic effects and air quality; and

WHEREAS, the DEIS/EIR may lead to a single locally-preferred option determined by the Metro Board; and

WHEREAS, the project's intention is to improve mobility for residents within the proposed area and plan for projected population growth and future congestion issues; and

WHEREAS, the chosen alignment will impact the social-economic fabric of the District for decades to come; and

WHEREAS, District students and families would greatly benefit from access to alternative modes of transportation;

NOW THEREFORE, THE BOARD DOES RESOLVE AS FOLLOWS:

SECTION 1. The Board of the Whittier Union High School District places its full support behind the Los Angeles County Metropolitan Transportation Authority Eastside Transit Corridor Phase 2 Washington Boulevard light rail alignment.

SECTION 2. The Board directs staff to work with Metro, community stakeholders, and constituents to encourage support for the Washington Boulevard alignment.

SECTION 3. The Board shall certify to the passage and adoption hereof.

APPROVED AND ADOPTED this 14th day of October 2014 at a regular meeting, by the following vote:

AYES: 5 NOES: 0 ABSENT: 0 ABSTAIN: 0

Attest:

Russell Castañeda Calleros, President
Whittier Union High School District

Sandra Thorstenson, Secretary to the Board
Whittier Union High School District

COUNTY OF LOS ANGELES
DEPARTMENT OF PARKS AND RECREATION
"Parks Make Life Better!"
Russ Guiney, Director John Wicker, Chief Deputy Director

October 21, 2014

Sent via email: eastsidephase2@metro.net

Ms. Laura Cornejo
Countywide Planning Director
Los Angeles County
Metropolitan Transportation Authority
One Gateway Plaza
Mail Stop: 99-22-2
Los Angeles, CA 90012

Dear Ms. Cornejo:

NOTICE OF AVAILABILITY OF AN ENVIRONMENTAL IMPACT REPORT FOR THE EASTSIDE TRANSIT CORRIDOR PHASE 2 PROJECT

The Notice of Availability for the Eastside Transit Corridor Phase 2 Project has been reviewed for potential impact on the facilities of the Los Angeles County Department of Parks and Recreation (DPR). The proposed SR-60 Alternative would impact Whittier Narrows Recreation Area (WNRA) and the Rio Hondo River Trail. The proposed Washington Boulevard Alternative would impact both the Rio Hondo River Trail and the San Gabriel River Trail.

Whittier Narrows Recreation Area

Aesthetics: The proposed project will degrade the quality of existing viewshed of the San Gabriel Mountains from inside the park. On Figure 4.6-3, the existing view consists of lake, trees and the mountains. The view with the proposed SR-60 Alternative will alter the existing landscape. Mitigation measures should include planting of trees in the section where the project is visible from inside the park to completely shield the view of the project.

Air Quality: The proposed activities associated with project construction could result in fugitive dust, mobile emissions, and various stationary source emissions. Certain park patrons are especially vulnerable to the effects of air pollutants, including the elderly, children, and persons with pre-existing respiratory or cardiovascular illness.

Noise: The construction of the proposed project will generate increased noise levels adversely affecting sensitive receptors such as the elderly and children who use the

park. Although construction noise is a temporary impact, mitigation measures should include scheduling construction during off peak use of the recreation facilities.

Biological Resources: The WNRA contains areas listed as Significant Ecological Areas and the impacts of construction and rail operations on sensitive bird species must be considered. As such, the project would normally be subject to review by the County's Significant Ecological Area Technical Advisory Committee (SEATAC). The County Department of Regional Planning, Impact Analysis Section is responsible for coordinating proposed project reviews with SEATAC. For any inquiries regarding SEAs and SEATAC you may contact the following staff at the Department of Regional Planning: Ms. Iris Chi, Planner, SEATAC Coordinator at (213) 974-6443 or by email at ichi@planning.lacounty.gov. Also, the project proposes to remove trees in WNRA for construction activities. DPR concurs that the removal of trees should be scheduled outside of bird nesting season. For coordination on the extent of tree removal, tree trimming as well as the re-planting of trees for restoration, please contact Mr. David Jallo, Park Superintendent, at (626) 575-5526 or djallo@parks.lacounty.gov.

Park Accessibility: Construction of the project may hamper use of park access road parallel to the SR-60, alternative access routes would be needed for park patrons to access certain areas of the park. Increased traffic on Santa Anita Avenue from the proposed Santa Anita Avenue Station will affect park patrons entering the park and park operations located next to the Station. Construction of the project will also impact the Triple B Clay Shooting Range. For the shooting range, mitigation measures should include installation of temporary walls to stop shotgun pellets.

P4.6-6, the areas that would be affected by the project are not the northernmost portions of the WNRA. There are portions of the WNRA located north of the SR-60. The areas affected by the project would be the portions of WNRA directly south of SR-60. Please correct this throughout the document.

Rio Hondo River Trail and San Gabriel River Trail

All construction activities, specifically those which generate construction traffic, noise or disturbances shall occur outside of high visitations days (weekends) and holidays. If temporary trail closure, obstruction detour, and/or restrictions are deemed necessary, Metro shall coordinate with the Department sixty (60) days prior to the onset of construction activities to allow for review and coordination of schedule for construction activities. Prior to temporary trail closure, obstructions, detour and/or restrictions, Metro shall provide the Department a complete description of construction activity, materials, equipment, method, trail re-route options and vehicles to be used, temporary signage as well as best management practices to be implemented. For trail inquiries, please contact Mr. Robert Ettleman at (213) 351-5134 or at rettleman@parks.lacounty.gov.

Prior to construction or any disturbance of the trail, Metro shall notify the public at-large of the pending construction activity, if any, forty-five (45) days prior to commencing construction. The form of public outreach shall be through several mediums such as local publications and public signs within a one mile radius of trail access points or existing trails. Notices on the trail shall begin approximately two (2) miles north and south of the construction zone in both directions with intermediate signs every one half mile. Notice shall be sent to groups such as equestrian, mountain bike, and hiking groups in the general area. Please coordinate with our trail staff regarding re-routing of the Rio Hondo River Trail and the San Gabriel River Trail during construction.

Construction activities and operations occurring within Whittier Narrows Recreation Area, Rio Hondo River Trail and San Gabriel River Trail may require a right-of-entry permit from DPR. Metro shall contact DPR ninety (90) days prior to commencing construction. For inquiries on the right-of-entry permit please contact Ms. Diane Thorne at (213) 351-5128 or by email at dthorne@parks.lacounty.gov.

The DPR concurs that the proposed Santa Anita Avenue Station of the SR-60 Alternative would provide park visitors a new way to access WNRA and will improve the parking situation and traffic jam on peak usage days at WNRA. Thank you for including this Department in this environmental review process. If we may be of further assistance, please contact Ms. Jui Ing Chien at (213) 351-5129 or by email at jchien@parks.lacounty.gov.

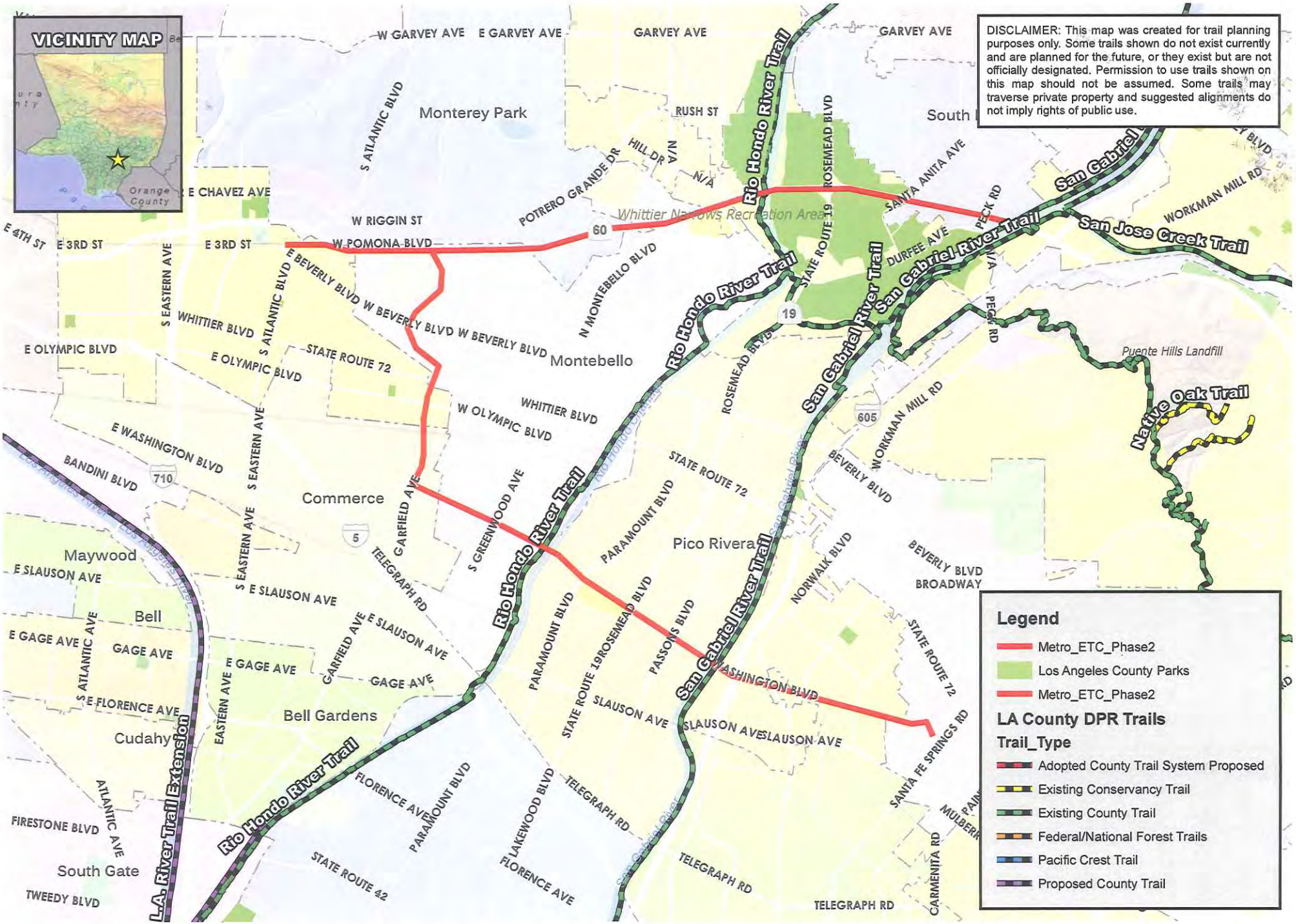
Sincerely,

Katharine King

Kathline King
Chief of Planning

KK:JC:ner/ Response to Metro, Eastside Transit Corridor Phase 2 Project NOA

c: Parks and Recreation (N. E. Garcia, K. King, H. Sohm, R. Williams, D. Jallo, K. Hays)



TRAIL REVIEW: EASTSIDE TRANSIT CORRIDOR PHASE 2

County of Los Angeles | Department of Parks & Recreation

2 Miles

Date: 10/15/14
Prepared By: Planning
Aerial: LAR-IAC3
Trails: EGIS.DPR_TRAILS
Parcels: EGIS.ASSR_PARCELS
Roads: Thomas Brothers (All rights reserved)

RIO HONDO COLLEGE

October 15, 2014

To Whom It May Concern:

On behalf of the Board of Trustees of Rio Hondo College, we are submitting this cover letter to accompany a Board resolution regarding the impending Eastside extension of the Gold Line Light Rail Project. This resolution expresses the Board's strong support for improved access to public transportation for students, staff, faculty, and the entire campus community. Although the Board is not taking an official position to endorse one alternative over another, it is still placing a high value on remaining involved in the planning process and suggesting amenities that would enhance access for students.

In addition to submitting the resolution the Board is urging Metro to consider the following ideas expressed by the Board at the recent October 8, 2014 Board of Trustees meeting:

- Rio Hondo College is planning an **intermodal transportation center** tentatively titled "Rio Plaza" that will provide amenities for public transit riders, bicyclists, and pedestrians. The "Rio Plaza" will connect regional transportation agencies to Rio Hondo College and encourage a culture of public and alternative modes of transportation
- Rio Hondo College seeks to connect **bicycle paths, lanes, and routes to and from the Eastside Gold Line Extension stations** that are nearest to the Rio Hondo College main campus (the "Peck Road" station in the SR-60 alternative or the "Norwalk Blvd" station in the Washington Blvd alternative)
- Rio Hondo College encourages collaboration and partnership with Metro on the location and use of proposed **parking structures** at stations for Rio Hondo College commuters
- Rio Hondo College seeks to collaborate and partner with Metro and other agencies to create an **outreach campaign to encourage Gold Line ridership** and the use of public and alternative modes of transportation
- Rio Hondo College requests consideration of **adding the name "Rio Hondo College"** to the yet-to-be-determined light rail stations at Peck Road station in the SR-60 alternative or the Norwalk Blvd. station alternative.

We respectfully request that this cover letter and the enclosed Board of Trustees resolution be added to the public record for the Goldline Extension. It is important for the Board's voice to be heard and for these suggestions to be considered in the deliberation process as Metro staff analyzes the two remaining alternatives.

Thank you in advance for your cooperation. If there are any questions, please contact Superintendent/President Dreyfuss at (562) 908-3403 or tdreyfuss@riohondo.edu

Sincerely,

Teresa Dreyfuss
Superintendent/President

Vicky Santana
President, Board of Trustees

Enclosure: Resolution to Advocate for Either Option of the Eastside Gold Line Extension

RIO HONDO COMMUNITY COLLEGE DISTRICT
BOARD OF TRUSTEES
AGENDA
Regular Meeting, October 8, 2014, 6:00 p.m.

III. ACTION ITEM

A. PRESIDENT'S OFFICE

2. Resolution to Advocate for Either Option of the Eastside Gold Line Extension

WHEREAS, the Rio Hondo Community College District Board of Trustees supports and encourages students, staff, faculty, and community the usage of public and alternative modes of transportation as a means to get to and from the Rio Hondo Community College District main campus and our Community Education Centers, and

WHEREAS, the remaining options for the Eastside Gold Line Extension would bring the Metro Gold Line Light Rail closer to the Rio Hondo Community College District and will benefit Rio Hondo students, and

WHEREAS, one option would transport Gold Line transit users to the intersection of the 60 (SR 60)freeway and Peck Rd. in the City of South El Monte, which is about one mile from campus, and

WHEREAS, the other option (Washington/Norwalk Blvd. station) would transport Gold Line transit users to the intersection of Washington Blvd. and Lambert Rd. in the City of Whittier, which is about four miles from campus, and

WHEREAS, both options would benefit thousands of riders in the Rio Hondo Community College District, and

WHEREAS, the Board of Trustees has remained steadfast in its commitment to ensure campus access for residents and students from all neighborhoods within the District, and

WHEREAS, both options would complement the award-winning GO RIO mass transit program which provides discounted access to six different bus agencies for all full-time students, and

WHEREAS, Rio Hondo Community College District strongly encourages ample amount of safe and secure bike lockers that utilize an electronic locking system like bike-link card or Tap card.

WHEREAS, both options would complement the Rio Plaza which is now in concept stages but will be constructed and finished before the Gold Line extension has been completed,

NOW, THEREFORE, the Board of Trustees of the Rio Hondo Community College District hereby resolves as follows:

that the Board of Trustees supports the Eastside extension of the Gold Line to serve the residents of Southeast Los Angeles, and

that the Board of Trustees values District involvement in the planning process so that the results of either scenario include amenities (e.g. bike paths, sidewalks, parking structures, lockers, walk-up vending machines) that benefit students and community members, and

that the Board of Trustees directs the Superintendent/President to work with staff to communicate this position to local elected officials including the Metro Board of Directors, Los Angeles County Board of Supervisors, local City Councilmembers, State Senators, State Assembly members, and Members of Congress

ADOPTED this 8th day of October, 2014

RECOMMENDATION: That the Board of Trustees adopt the resolution to support the Eastside extension of the Gold Line.

Disposition:

It was moved by Ms. Shapiro, seconded by Ms. Pacheco and carried, that Report No. IIIA2 with the following revisions: As amended be

_____ Accepted and Approved - Action No. _____
_____ Not Approved
_____ Delayed for further Study

		Yes	No
Vote:		5	0
Student Advisory Vote	Vote:	1	

A Resolution in Support of the SR-60 Alignment as the preferred alignment for the Eastside Transit Corridor Phase 2

WHEREAS, the Eastside Transit Corridor Phase 2 Project is a vital transit infrastructure investment that would provide a transit connection to the existing Metro Gold Line Eastside Extension and link communities on the eastern side of the County of Los Angeles with two stops in the cities of Montebello and South El Monte; and

WHEREAS, with the implementation of the Regional Connector Transit Corridor project, the Metro Gold Line Eastside Extension will directly connect to the Metro Expo Line and will be operating light rail trains between Santa Monica, Culver City, University of Southern California (USC), downtown Los Angeles, and the Eastside by 2020, improving mobility within the project area and offering more sustainable transit alternatives; and

WHEREAS, in addition to mobility benefits, the Eastside Transit Corridor Phase 2 Project would provide the project area with transportation, economic, land use, and environmental benefits. Improved mobility to and from the project area has the potential to boost economic development in the project area and improve social justice by providing better access to employment, educational opportunities, and activity centers; and

WHEREAS, improved transit connectivity would increase transit ridership, which would also generate environmental benefits through reduced vehicle trips, less roadway congestion, and improved air quality; and

WHEREAS, these proposed projects would create over 15,000 permanent new jobs for the region to add to the existing 241,500 employees within a 10 minute drive shed of these stations, and would create 2 million square feet of new development; and

WHEREAS, the purpose of the Eastside Transit Corridor Phase 2 Project is to provide area residents, businesses, and transit-dependent populations with a transit alternative connecting them to the Metro Gold Line Eastside Extension and the regional rail system, serving the large number of transit-dependent and low-income populations in the project area and increasing access to major employment centers, activity centers, and destinations in the project area and Los Angeles County;

NOW, THEREFORE, BE IT RESOLVED that the Valle Lindo School District Board of Education supports the SR-60 Alignment as the preferred alignment for the Eastside Transit Corridor Phase 2, and the SR-60 coalition including the 6 cities (Monterey Park, Montebello, Rosemead, El Monte, South El Monte and City of Industry) whose goal is to promote the future alignment of the Gold Line Eastside Extension along the 60 freeway. Adopted this 8th day of October, 2014.

Ruth E. Gonzales, President

Gloria Olmos, Clerk

Richard Angel, Vice President

Veronica Lauria, Member

Rudy Martinez, Member

Whittier City School District

Students First. Every Decision – Every Day.

Office of the Superintendent
7211 S. Whittier Avenue • Whittier, CA 90602-1189 • Main: 562-789-3075 • Fax: 562-698-6534 • www.whittiercity.net

October 15, 2014

Laura Cornejo
Director, Countywide Planning
Los Angeles County Metropolitan Transportation Authority
One Gateway Plaza, MS 99-22-2
Los Angeles, CA 90012

Dear Ms. Cornejo:

I am writing in support of the Washington Boulevard alternative for the Metro Eastside Transit Corridor Extension. The Whittier City School District urges Metro staff to recommend and the Metro Board to select this alternative over the SR-60 option.

The Washington Boulevard plan is significantly better choice because of whom it serves, the kind of service it provides, and the ways in which the community will benefit. It is our responsibility to future generations to ensure that public transportation serves the people who need it most, uses resources wisely, and respects our fragile environment.

The Washington Boulevard alternative will carry over one million more riders per year than the SR-60 alternative, and will draw close to double the number of new riders annually. It will serve the highest number of low-income, senior, and transit-dependent households, serving communities, which are historically the most underfunded for public transportation.

The Washington Boulevard route will reach people where they work, shop and live, with stations located in walking distance of their starting point and final destination. Stations will be within reach for residents and workers in Commerce, Montebello, Pico Rivera, Santa Fe Springs, Whittier, and unincorporated Los Angeles County, compared to the SR–60 route, serving primarily motorists who may park and ride for a portion of their trip.

The Washington Boulevard route provides service at a lower cost per rider and will cost about 25% less per service hour than the SR-60. Metro has the opportunity to extend a system of regional transportation that could provide an efficient transit link between southeast Los Angeles County and downtown. This light rail connection would be a gift for generations to come.

Finally, Whittier City School District has serious concerns about the negative environmental impact of the SR-60 route. It skirts an EPA Superfund site and travels through Whittier Narrows, a cherished and ecologically sensitive part of our community. A light rail project is designed to improve the environment; it shouldn't sacrifice a delicate natural resource.

Thank you for the opportunity to comment on this important project. We look forward to the prospect of light rail coming to our community and urge you to support the Washington Boulevard alternative.

Sincerely,

Ron Carruth

Ron Carruth, Ed. D.
Superintendent

OUR MISSION

WHITTIER CITY SCHOOL DISTRICT

The mission of the WCSD is to partner with students, parents, and the community to ensure learning so every student reaches his/her optimum potential and has a positive impact on a global society.

Nseir, Jacqueline

From: Janet Cappellanti-Adams <JCappellanti-Adams@dmh.lacounty.gov>
Sent: Thursday, October 02, 2014 1:06 PM
To: EastSidePhase2
Cc: ms.giannetta@gmail.com
Subject: Comment(s) / Enquiries

Good afternoon, Ms. Cornejo:

After reading, studying and going over the MTA pamphlet entitled, 'Help Us Plan More Transit Near You', my enquiries would be as follows, listed below:

- Is MTA planning to extend the Gold Line further south into East Los Angeles and beyond that or what else??
- Since the MTA pamphlet is entitled as such, what about other areas i.e. further eastward past the last Gold Line station stop at Sierra Madre Villa? ? Is that MTA project still going on, how far eastward will it go, where will it end and what is the status of it right now as I am emailing this communication??

Comment(s): I hope that MTA does not raise its fares again when these projects are completed since MTA just recently raised its fares anyway/anyhow. In addition, I regret that I will not be able to attend any of the public hearings since I commute via MTA public transportation. Even though the closest public hearing for me is located in the city of South El Monte, it would still not be conducive, let alone convenient, being that I reside in the city of Pasadena; by the time that the hearing would be concluded, I would be returning home too late by the time that I arrived there, (city of Pasadena). However, if MTA can inform me where I can go on its website to view the results of the public hearings, I would appreciate it; thanks.

Sincerely,
Ms. J. Cappellanti-Adams

Janet Cappellanti-Adams
Los Angeles County Department of Mental Health
Central Business Office
695 South Vermont Avenue, Suite 900
Los Angeles, CA 90005-1349
Telephone: (213) 480-3477
Fax: (213) 252-8880
Email: JCappellanti-Adams@dmh.lacounty.gov

Regional Agencies

SGVCOG

October 21, 2014

Mayor Eric Garcetti, Chair
Los Angeles County Metropolitan Transportation Authority
One Gateway Plaza
Los Angeles, California 90012-2952

RE: SR-60 Light Rail Transit (LRT) Route

Dear Mayor Garcetti:

The San Gabriel Valley Council of Governments (SGVCOG) supports the SR-60 Light Rail Transit (LRT) Route as the preferred route for the proposed Gold Line Eastside Extension Phase 2. Since January 2009, the SGVCOG has supported the SR-60 alignment and requests that the Measure R funding be allocated for this project.

Thank you for your consideration of the SGVCOG's position. If you have any questions or require additional information, please do not hesitate to contact me.

Sincerely,

Mary Ann Lutz
President

cc MTA Board of Directors
Art Leahy, Chief Executive Officer

MWD
METROPOLITAN WATER DISTRICT OF SOUTHERN CALIFORNIA

Executive Office

October 20, 2014 **Via Electronic and Regular Mail**

Ms. Laura Cornejo
Los Angeles County Metropolitan Transportation Authority
One Gateway Plaza, MS 99-22-1
Los Angeles, CA 90012

Dear Ms. Cornejo:

Notice of Availability of
Draft Environmental Impact Report/Study for the Eastside Transit Corridor Phase 2 Project

The Metropolitan Water District of Southern California (Metropolitan) reviewed the Notice of Availability of a Draft Environmental Impact Report/Study for the Eastside Transit Corridor Phase 2 Project (Project). The proposed project would extend the Metro Gold Line Eastside extension light rail transit system from its current terminus at the Atlantic Station to the east by 6.9 to 9.5 miles. Depending on the selected alternative evaluated in the Draft EIR/EIS, the Project would terminate near State Road 60/Peck Road in the city of South El Monte or Washington Boulevard and Lambert Road in the city of Whittier. The project area covers over 50 square miles to the east and southeast of downtown Los Angeles. This letter contains Metropolitan's response to the Public Notice as a potentially-affected public agency.

Metropolitan previously provided comment letters for the Project's Early Scoping Notice and in response to Metro's Invitation to Become a Participating Agency, in 2007 and 2010, respectively (copies attached). As stated in both letters, the Project's proposed build alternatives would intersect Metropolitan's 72-inch-inside-diameter Middle Feeder. For your information a map depicting the Middle Feeder in the Project vicinity is attached. Please note also that the Garvey Reservoir described on page 4.12-8 in the Draft EIR is a Metropolitan facility.

To assist Metro in preparing a plan for the Project that is compatible with Metropolitan's facilities, easements, and properties, a copy of Metropolitan's "Guidelines for Developments in the Area of Facilities, Fee Properties, and/or Easements of The Metropolitan Water District of Southern California" was enclosed with our 2007 letter. Although the Draft EIR does not state that the Middle Feeder pipeline intersects either of the proposed build alternatives, thank you for acknowledging on page 4.22-2 that Metro will coordinate and seek approval from utility purveyors, including Metropolitan, for Project-related utility relocation or service interruption. For the record, we would like to reiterate that to avoid potential conflicts with Metropolitan's rights-of-way, we require that any design plans for any activity in the area of Metropolitan's pipelines or facilities be submitted for our review and written approval. Thus, please contact Metropolitan's Substructures Team at EngineeringSubstructures@mwdh2o.com for additional

information regarding the Middle Feeder and Metropolitan's rights-of-way procedures as the environmental review process for the Project continues and prior to construction commencing.

We appreciate the opportunity to provide input to your planning process and we look forward to receiving future documentation on this project. For further assistance, please contact Mr. Alex Marks at (213) 217-7629.

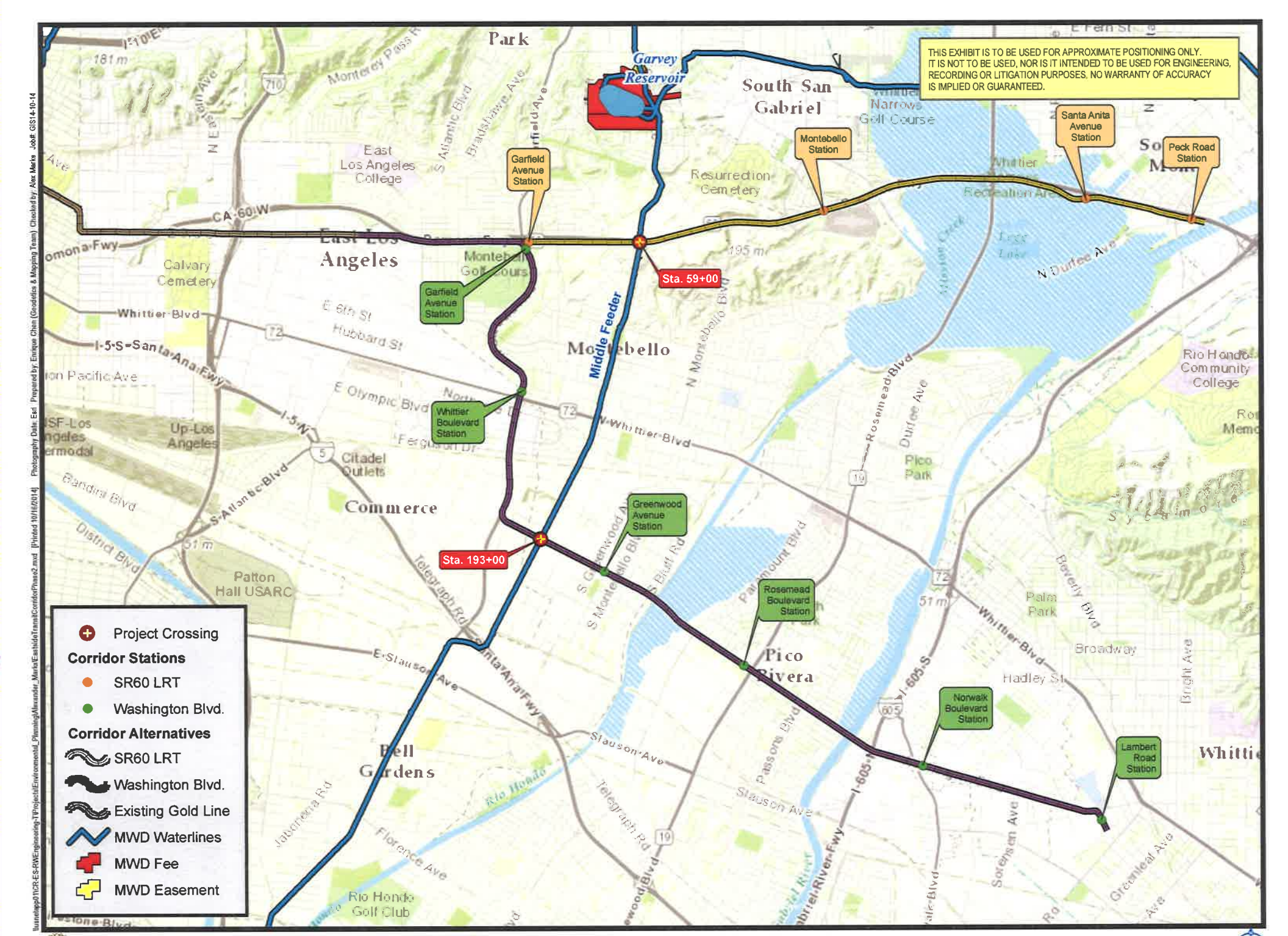
Very truly yours,

Deirdre West
Manager, Environmental Planning Team

AM/am
J:\Environmental Planning&Compliance\Completed Jobs\Sept2014\JobNo20140912MIS\MetroDEIRcom

Enclosures: MWDSC November 20, 2007 and March 29, 2010 letters to Ms. Kimberly Yu and Map of Metropolitan Facilities in Project Vicinity

cc: K. Callanan



The Metropolitan Water District of Southern California
Engineering Services Group

Metro Eastside Transit Corridor Phase 2

MWD Interests - Middle Feeder

2.00902207

THE METROPOLITAN WATER DISTRICT
OF SOUTHERN CALIFORNIA

Office of the General Manager

March 29, 2010 **Via E-Mail and Regular Mail**

Ms. Kimberly Yu
Project Manager
Los Angeles County Metropolitan Transportation Authority
One Gateway Plaza
Mail Stop 99-22-2
Los Angeles, CA 90012

Dear Ms. Yu:

Invitation to Become Participating Agency on Proposed Transit Improvements
in the Eastside Transit Corridor Phase 2 Project, Environmental Impact Statement (EIS)

The Metropolitan Water District of Southern California (Metropolitan) received an invitation to become a participating agency on the Eastside Transit Corridor Phase 2 Project Environmental Impact Statement (Project). The Federal Transit Administration and the Los Angeles County Metropolitan Transportation Authority (collectively, Agencies) are acting as the Lead Agencies under the National Environmental Policy Act for this Project. The Project proposes to provide transit connection to the Metro Gold Line Eastside Extension by linking communities farther east of Los Angeles to the regional transit network and to improve mobility within the project area by enhancing transit options in a sustainable manner. This public notice also identified Metropolitan as an agency that may have interests due to our legislative and/or regulatory jurisdiction, and has invited Metropolitan to be a participating agency in the development of the Project's environmental analysis. This letter contains Metropolitan's response to the Public Notice as a potentially affected public agency.

Metropolitan previously provided comments for the Early Scoping Notice dated November 20, 2007, a copy of which is enclosed for reference. Our letter identified Metropolitan's Middle Feeder Pipeline as intersecting the six Potential Routes within the project site. Metropolitan reviewed the Alternative Analysis Study and Alternatives Analysis Report Addendum (2009) and concluded the Build Alternatives (State Route 60 Light Rail Transit and Washington Boulevard Light Rail Transit) would affect Metropolitan's Middle Feeder. We want to ensure that the Draft EIS addresses our concerns over potential environmental impacts to Metropolitan's infrastructure. We encourage the Agencies to work with Metropolitan on pipelines and rights-of-way procedures by contacting Metropolitan's Substructures Information Line at (213) 217-6564.

While we welcome the invitation, Metropolitan will decline the opportunity to become a participating agency in the Agencies' environmental review process. We will review the Agencies' environmental document during the formal public review process and provide comments as necessary.

We appreciate the opportunity to provide input to your planning process and look forward to receiving the Draft EIS and future environmental documentation on this Project. If we can be of further assistance, please contact Ms. Brenda S. Marines at (213) 217-7902.

Very truly yours,

Delaine W. Shane
Manager, Environmental Planning Team

BSM/bsm
(Public Folders/EPU/Letters/18-FEB10A-doc- Kimberly Yu, Intent to Prepare an EIS for the Eastside Transit Corridor)

Enclosure: November 20, 2007 Letter

2007103001

MWD
METROPOLITAN WATER DISTRICT OF SOUTHERN CALIFORNIA

Executive Office

November 20, 2007 **Via E-mail**

Ms. Kimberly Yu
Project Manager
Los Angeles County Metropolitan Transportation Authority
One Gateway Plaza
Los Angeles, CA 90012

Dear Ms. Yu:

Early Scoping Notice for an Alternative Analysis of
Proposed Transit Improvements in the Eastside Extension Phase II Transit Corridor

The Metropolitan Water District of Southern California (Metropolitan) received a copy of the Early Scoping Notice for an Alternative Analysis of Proposed Transit Improvements in the Eastside Extension Phase II Transit Corridor (Project). The Federal Transit Administration and the Los Angeles County Metropolitan Transportation Authority are initiating work on the Alternative Analysis Study. The corridor is east-west oriented and would provide the cities of Montebello, Pico Rivera, Monterey Park, Industry, Downey, Whittier, Commerce, Rosemead, South El Monte, South San Gabriel, Santa Fe Springs, Bell , and unincorporated portions of County of Los Angeles with improved fixed-guideway transit service between the terminus of the Metro Gold Line Eastside Extension (currently under construction), located at Atlantic Avenue and Beverly Avenue, and eastward to approximately three miles east of State Route 605. This letter contains Metropolitan's response to the Public Notice as a potentially-affected public agency.

Metropolitan owns and operates the Middle Feeder pipeline and facilities that is located within the project site. The Middle Feeder pipeline is a 72-inch pipeline that runs in a northerly to southerly direction along Vail Street. The Potential Routes will intersect the Middle Feeder at Washington Boulevard, Olympic Boulevard, Whittier Boulevard, Beverly Boulevard, and at State Route 605. Metropolitan is concerned about the possible impact of the Project to the Middle Feeder and to other Metropolitan facilities in the vicinity.

We are concerned with potential impacts to this facility associated with future excavation, construction, utilities or any redevelopment that may occur as a result of proposed activity under the proposed Project. Development and redevelopment associated with the proposed Project must not restrict any of Metropolitan's day-to-day operations and/or access to its facilities. Nor can the Project affect the water quality of Metropolitan supplies by allowing for non-compatible land uses.

700 N. Alameda Street, Los Angeles, California 90012 • Mailing Address: P.O. Box 54153, Los Angeles, California, 90054-0153 • Telephone: (213) 217-6000

In order to avoid potential conflicts with Metropolitan's rights-of-way, we require that any design plans for any activity in the area of Metropolitan's pipelines or facilities be submitted for our review and written approval. Approval of the Project where it could impact Metropolitan's property should be contingent on Metropolitan's approval of design plans for the Project. Detailed prints of drawings of Metropolitan's pipelines and rights-of-way may be obtained by calling Metropolitan's Substructures Information Line at (213) 217-6564. To assist in preparing plans that are compatible with Metropolitan's facilities, easements, and properties, we have enclosed a copy of the "Guidelines for Developments in the Area of Facilities, Fee Properties, and/or Easements of The Metropolitan Water District of Southern California." Please note that all submitted designs or plans must clearly identify Metropolitan's facilities and rights-of-way.

We appreciate the opportunity to provide input to your planning process and we look forward to receiving future environmental documentation and the Draft EIR on this Project. If we can be of further assistance, please contact Ms. Brenda S. Marines at (213) 217-7902.

Very truly yours,

Delaine W. Shane
Manager, Environmental Planning Team

BSM/bsm
(Public Folders/EPU/Letters/08-NOV-07A.doc – Kimberly Yu)

Enclosure: Planning Guidelines
Map

The Metropolitan Water District of Southern California
And Eastside Transit Corridor, Phase 2

The Metropolitan Water District of Southern California.

Guidelines for Developments in the Area of Facilities, Fee Properties, and/or Easements of The Metropolitan Water District of Southern California

1. Introduction

a. The following general guidelines should be followed for the design of proposed facilities and developments in the area of Metropolitan's facilities, fee properties, and/or easements.

b. We require that 3 copies of your tentative and final record maps, grading, paving, street improvement, landscape, storm drain, and utility plans be submitted for our review and written approval as they pertain to Metropolitan's facilities, fee properties and/or easements, prior to the commencement of any construction work.

2. Plans, Parcel and Tract Maps

The following are Metropolitan's requirements for the identification of its facilities, fee properties, and/or easements on your plans, parcel maps and tract maps:

a. Metropolitan's fee properties and/or easements and its pipelines and other facilities must be fully shown and identified as Metropolitan's on all applicable plans.

b. Metropolitan's fee properties and/or easements must be shown and identified as Metropolitan's with the official recording data on all applicable parcel and tract maps.

c. Metropolitan's fee properties and/or easements and existing survey monuments must be dimensionally tied to the parcel or tract boundaries.

d. Metropolitan's records of surveys must be referenced on the parcel and tract maps.

3. Maintenance of Access Along Metropolitan's Rights-of-Way

a. Proposed cut or fill slopes exceeding 10 percent are normally not allowed within Metropolitan's fee properties or easements. This is required to facilitate the use of construction and maintenance equipment, and provide access to its aboveground and belowground facilities.

b. We require that 16-foot-wide commercial-type driveway approaches be constructed on both sides of all streets crossing Metropolitan's rights-of-way. Openings are required in any median island. Access ramps, if necessary, must be at least 16-feet-wide. Grades of ramps are normally not allowed to exceed 10 percent. If the slope of an access ramp must exceed 10 percent due to the topography, the ramp must be paved. We require a 40-foot-long level area on the driveway approach to access ramps where the ramp meets the street. At Metropolitan's fee properties, we may require fences and gates.

c. The terms of Metropolitan's permanent easement deeds normally preclude the building or maintenance of structures of any nature or kind within its easements, to ensure safety and avoid interference with operation and maintenance of Metropolitan's pipelines or other facilities. Metropolitan must have vehicular access along the easements at all times for inspection, patrolling, and for maintenance of the pipelines and other facilities on a routine basis. We require a 20-foot-wide clear zone around all above-ground facilities for this routine access. This clear zone should slope away from our facility on a grade not to exceed 2 percent. We must also have access along the easements with construction equipment. An example of this is shown on Figure 1.

d. The footings of any proposed buildings adjacent to Metropolitan's fee properties and/or easements must not encroach into the fee property or easement or impose additional loading on Metropolitan's pipelines or other facilities therein. A typical situation is shown on Figure 2. Prints of the detail plans of the footings for any building or structure adjacent to the fee property or easement must be submitted for our review and written approval as they pertain to the pipeline or other facilities therein. Also, roof eaves of buildings adjacent to the easement or fee property must not overhang into the fee property or easement area.

e. Metropolitan's pipelines and other facilities, e.g. structures, manholes, equipment, survey monuments, etc. within its fee properties and/or easements must be protected from damage by the easement holder on Metropolitan's property or the property owner where Metropolitan has an easement, at no expense to Metropolitan. If the facility is a cathodic protection station it shall be located prior to any grading or excavation. The exact location, description and way of protection shall be shown on the related plans for the easement area.

4. Easements on Metropolitan's Property

a. We encourage the use of Metropolitan's fee rights-of-way by governmental agencies for public street and utility purposes, provided that such use does not interfere with Metropolitan's use of the property, the entire width of the property is accepted into the agency's public street system and fair market value is paid for such use of the right-of-way.

b. Please contact the Director of Metropolitan's Right of Way and Land Division, telephone (213) 250-6302, concerning easements for landscaping, street, storm drain, sewer, water or other public facilities proposed within Metropolitan's fee properties. A map and legal description of the requested easements must be submitted. Also, written evidence must be submitted that shows the city or county will accept the easement for the specific purposes into its public system. The grant of the easement will be subject to Metropolitan's rights to use its land for water pipelines and related purposes to the same extent as if such grant had not been made. There will be a charge for the easement. Please note that, if entry is required on the property prior to issuance of the easement, an entry permit must be obtained. There will also be a charge for the entry permit.

5. Landscaping

Metropolitan's landscape guidelines for its fee properties and/or easements are as follows:

a. A green belt may be allowed within Metropolitan's fee property or easement.

b. All landscape plans shall show the location and size of Metropolitan's fee property and/or easement and the location and size of Metropolitan's pipeline or other facilities therein.

c. Absolutely no trees will be allowed within 15 feet of the centerline of Metropolitan's existing or future pipelines and facilities.

d. Deep-rooted trees are prohibited within Metropolitan's fee properties and/or easements. Shallow-rooted trees are the only trees allowed. The shallow-rooted trees will not be permitted any closer than 15 feet from the centerline of the pipeline, and such trees shall not be taller than 25 feet with a root spread no greater than 20 feet in diameter at maturity. Shrubs, bushes, vines, and ground cover are permitted, but larger shrubs and bushes should not be planted directly over our pipeline. Turf is acceptable. We require submittal of landscape plans for Metropolitan's prior review and written approval. (See Figure 3).

e. The landscape plans must contain provisions for Metropolitan's vehicular access at all times along its rights-of-way to its pipelines or facilities therein. Gates capable of accepting Metropolitan's locks are required in any fences across its rights-of-way. Also, any walks or drainage facilities across its access route must be constructed to AASHTO H-20 loading standards.

f. Rights to landscape any of Metropolitan's fee properties must be acquired from its Right of Way and Land Division. Appropriate entry permits must be obtained prior to any entry on its property. There will be a charge for any entry permit or easements required.

6. Fencing

Metropolitan requires that perimeter fencing of its fee properties and facilities be constructed of universal chain link, 6 feet in height and topped with 3 strands of barbed wire angled upward and outward at a 45 degree angle or an approved equal for a total fence height of 7 feet. Suitable substitute fencing may be considered by Metropolitan. (Please see Figure 5 for details).

7. Utilities in Metropolitan's Fee Properties and/or Easements or Adjacent to Its Pipeline in Public Streets

Metropolitan's policy for the alinement of utilities permitted within its fee properties and/or easements and street rights-of-way is as follows:

a. Permanent structures, including catch basins, manholes, power poles, telephone riser boxes, etc., shall not be located within its fee properties and/or easements.

b. We request that permanent utility structures within public streets, in which Metropolitan's facilities are constructed under the Metropolitan Water District Act, be placed as far from our pipeline as possible, but not closer than 5 feet from the outside of our pipeline.

c. The installation of utilities over or under Metropolitan's pipeline(s) must be in accordance with the requirements shown on the enclosed prints of Drawings Nos. C-11632 and C-9547. Whenever possible we request a minimum of one foot clearance between Metropolitan's pipe and your facility. Temporary support of Metropolitan's pipe may also be required at undercrossings of its pipe in an open trench. The temporary support plans must be reviewed and approved by Metropolitan.

d. Lateral utility crossings of Metropolitan's pipelines must be as perpendicular to its pipeline alinement as practical. Prior to any excavation our pipeline shall be located manually and any excavation within two feet of our pipeline must be done by hand. This shall be noted on the appropriate drawings.

e. Utilities constructed longitudinally within Metropolitan's rights-of-way must be located outside the theoretical trench prism for uncovering its pipeline and must be located parallel to and as close to its rights-of-way lines as practical.

f. When piping is jacked or installed in jacked casing or tunnel under Metropolitan's pipe, there must be at least two feet of vertical clearance between the bottom of Metropolitan's pipe and the top of the jacked pipe, jacked casing or tunnel. We also require that detail drawings of the shoring for the jacking or tunneling pits be submitted for our review and approval. Provisions must be made to grout any voids around the exterior of the jacked pipe, jacked casing or tunnel. If the piping is installed in a jacked casing or tunnel the annular space between the piping and the jacked casing or tunnel must be filled with grout.

g. Overhead electrical and telephone line requirements:

1) Conductor clearances are to conform to the California State Public Utilities Commission, General Order 95, for Overhead Electrical Line Construction or at a greater clearance if required by Metropolitan. Under no circumstances shall clearance be less than 35 feet.

2) A marker must be attached to the power pole showing the ground clearance and line voltage, to help prevent damage to your facilities during maintenance or other work being done in the area.

3) Line clearance over Metropolitan's fee properties and/or easements shall be shown on the drawing to indicate the lowest point of the line under the most adverse conditions including consideration of sag, wind load, temperature change, and support type. We require that overhead lines be located at least 30 feet laterally away from all above-ground structures on the pipelines.

4) When underground electrical conduits, 120 volts or greater, are installed within Metropolitan's fee property and/or easement, the conduits must be incased in a minimum of three inches of red concrete. Where possible, above ground warning signs must also be placed at the right-of-way lines where the conduits enter and exit the right-of-way.

h. The construction of sewerlines in Metropolitan's fee properties and/or easements must conform to the California Department of Health Services Criteria for the Separation of Water Mains and Sanitary Services and the local City or County Health Code Ordinance as it relates to installation of sewers in the vicinity of pressure waterlines. The construction of sewerlines should also conform to these standards in street rights-of- way.

i. Cross sections shall be provided for all pipeline crossings showing Metropolitan's fee property and/or easement limits and the location of our pipeline(s). The exact locations of the crossing pipelines and their elevations shall be marked on as-built drawings for our information.

j. Potholing of Metropolitan's pipeline is required if the vertical clearance between a utility and Metropolitan's pipeline is indicated on the plan to be one foot or less. If the indicated clearance is between one and two feet, potholing is suggested. Metropolitan will provide a representative to assists others in locating and identifying its pipeline. Two-working days notice is requested.

k. Adequate shoring and bracing is required for the full depth of the trench when the excavation encroaches within the zone shown on Figure 4.

l. The location of utilities within Metropolitan's fee property and/or easement shall be plainly marked to help prevent damage during maintenance or other work done in the area. Detectable tape over buried utilities should be placed a minimum of 12 inches above the utility and shall conform to the following requirements:

1) Water pipeline: A two-inch blue warning tape shall be imprinted with:

"CAUTION BURIED WATER PIPELINE"

2) Gas, oil, or chemical pipeline: A two-inch yellow warning tape shall be imprinted with:

"CAUTION BURIED _____ PIPELINE"

3) Sewer or storm drain pipeline: A two-inch green warning tape shall be imprinted with:

"CAUTION BURIED _____ PIPELINE"

4) Electric, street lighting, or traffic signals conduit: A two-inch red warning tape shall be imprinted with:

"CAUTION BURIED _____ CONDUIT"

5) Telephone, or television conduit: A two-inch orange warning tape shall be imprinted with:

"CAUTION BURIED _____ CONDUIT"

m. Cathodic Protection requirements:

1) If there is a cathodic protection station for Metropolitan's pipeline in the area of the proposed work, it shall be located prior to any grading or excavation. The exact location, description and manner of protection shall be shown on all applicable plans. Please contact Metropolitan's Corrosion Engineering Section, located at Metropolitan's F. E. Weymouth Softening and Filtration Plant, 700 North Moreno Avenue, La Verne, California 91750, telephone (714) 593-7474, for the locations of Metropolitan's cathodic protection stations.

2) If an induced-current cathodic protection system is to be installed on any pipeline crossing Metropolitan's pipeline, please contact Mr. Wayne E. Risner at (714) 593-7474 or (213) 250-5085. He will review the proposed system and determine if any conflicts will arise with the existing cathodic protection systems installed by Metropolitan.

3) Within Metropolitan's rights-of-way, pipelines and carrier pipes (casings) shall be coated with an approved protective coating to conform to Metropolitan's requirements, and shall be maintained in a neat and orderly condition as directed by Metropolitan. The application and monitoring of cathodic protection on the pipeline and casing shall conform to Title 49 of the Code of Federal Regulations, Part 195.

4) If a steel carrier pipe (casing) is used:

(a) Cathodic protection shall be provided by use of a sacrificial magnesium anode (a sketch showing the cathodic protection details can be provided for the designers information).

(b) The steel carrier pipe shall be protected with a coal tar enamel coating inside and out in accordance with AWWA C203 specification.

n. All trenches shall be excavated to comply with the CAL/OSHA Construction Safety Orders, Article 6, beginning with Sections 1539 through 1547. Trench backfill shall be placed in 8-inch lifts and shall be compacted to 95 percent relative compaction (ASTM D698) across roadways and through protective dikes. Trench backfill elsewhere will be compacted to 90 percent relative compaction (ASTM D698).

o. Control cables connected with the operation of Metropolitan's system are buried within streets, its fee properties and/or easements. The locations and elevations of these cables shall be shown on the drawings. The drawings shall note that prior to any excavation in the area, the control cables shall be located and measures shall be taken by the contractor to protect the cables in place.

p. Metropolitan is a member of Underground Service Alert (USA). The contractor (excavator) shall contact USA at 1-800-422-4133 (Southern California) at least 48 hours prior to starting any excavation work. The contractor will be liable for any damage to Metropolitan's facilities as a result of the construction.

8. Paramount Right

Facilities constructed within Metropolitan's fee properties and/or easements shall be subject to the paramount right of Metropolitan to use its fee properties and/or easements for the purpose for which they were acquired. If at any time Metropolitan or its assigns should, in the exercise of their rights, find it necessary to remove any of the facilities from the fee properties and/or easements, such removal and replacement shall be at the expense of the owner of the facility.

9. Modification of Metropolitan's Facilities

When a manhole or other of Metropolitan's facilities must be modified to accommodate your construction or reconstruction, Metropolitan will modify the facilities with its forces. This should be noted on the construction plans. The estimated cost to perform this modification will be given to you and we will require a deposit for this amount before the work is performed. Once the deposit is received, we will schedule the work. Our forces will coordinate the work with your contractor. Our final billing will be based on actual cost incurred, and will include materials, construction, engineering plan review, inspection, and administrative overhead charges calculated in accordance with Metropolitan's standard accounting practices. If the cost is less than the deposit, a refund will be made; however, if the cost exceeds the deposit, an invoice will be forwarded for payment of the additional amount.

10. Drainage

a. Residential or commercial development typically increases and concentrates the peak storm water runoff as well as the total yearly storm runoff from an area, thereby increasing the requirements for storm drain facilities downstream of the development. Also, throughout the year water from landscape irrigation, car washing, and other outdoor domestic water uses flows into the storm drainage system resulting in weed abatement, insect infestation, obstructed access and other problems. Therefore, it is Metropolitan's usual practice not to approve plans that show discharge of drainage from developments onto its fee properties and/or easements.

b. If water must be carried across or discharged onto Metropolitan's fee properties and/or easements, Metropolitan will insist that plans for development provide that it be carried by closed conduit or lined open channel approved in writing by Metropolitan. Also the drainage facilities must be maintained by others, e.g., city, county, homeowners association, etc. If the development proposes changes to existing drainage features, then the developer shall make provisions to provide for replacement and these changes must be approved by Metropolitan in writing.

11. Construction Coordination

During construction, Metropolitan's field representative will make periodic inspections. We request that a stipulation be added to the plans or specifications for notification of Mr. _____ of Metropolitan's Operations Services Branch, telephone (213) 250-____, at least two working days prior to any work in the vicinity of our facilities.

12. Pipeline Loading Restrictions

a. Metropolitan's pipelines and conduits vary in structural strength, and some are not adequate for AASHTO H-20 loading. Therefore, specific loads over the specific sections of pipe or conduit must be reviewed and approved by Metropolitan. However, Metropolitan's pipelines are typically adequate for AASHTO H-20 loading provided that the cover over the pipeline is not less than four feet or the cover is not substantially increased. If the temporary cover over the pipeline during construction is between three and four feet, equipment must restricted to that which

imposes loads no greater than AASHTO H-10. If the cover is between two and three feet, equipment must be restricted to that of a Caterpillar D-4 tract-type tractor. If the cover is less than two feet, only hand equipment may be used. Also, if the contractor plans to use any equipment over Metropolitan's pipeline which will impose loads greater than AASHTO H-20, it will be necessary to submit the specifications of such equipment for our review and approval at least one week prior to its use. More restrictive requirements may apply to the loading guideline over the San Diego Pipelines 1 and 2, portions of the Orange County Feeder, and the Colorado River Aqueduct. Please contact us for loading restrictions on all of Metropolitan's pipelines and conduits.

b. The existing cover over the pipeline shall be maintained unless Metropolitan determines that proposed changes do not pose a hazard to the integrity of the pipeline or an impediment to its maintenance.

13. Blasting

a. At least 20 days prior to the start of any drilling for rock excavation blasting, or any blasting, in the vicinity of Metropolitan's facilities, a two-part preliminary conceptual plan shall be submitted to Metropolitan as follows:

b. Part 1 of the conceptual plan shall include a complete summary of proposed transportation, handling, storage, and use of explosions.

c. Part 2 shall include the proposed general concept for blasting, including controlled blasting techniques and controls of noise, fly rock, airblast, and ground vibration.

14. CEQA Requirements

a. When Environmental Documents Have Not Been Prepared

1) Regulations implementing the California Environmental Quality Act (CEQA) require that Metropolitan have an opportunity to consult with the agency or consultants preparing any environmental documentation. We are required to review and consider the environmental effects of the project as shown in the Negative Declaration or Environmental Impact Report (EIR) prepared for your project before committing Metropolitan to approve your request.

2) In order to ensure compliance with the regulations implementing CEQA where Metropolitan is not the Lead Agency, the following minimum procedures to ensure compliance with the Act have been established:

a) Metropolitan shall be timely advised of any determination that a Categorical Exemption applies to the project. The Lead Agency is to advise Metropolitan that it and other agencies participating in the project have complied with the requirements of CEQA prior to Metropolitan's participation.

b) Metropolitan is to be consulted during the preparation of the Negative Declaration or EIR.

c) Metropolitan is to review and submit any necessary comments on the Negative Declaration or draft EIR.

d) Metropolitan is to be indemnified for any costs or liability arising out of any violation of any laws or regulations including but not limited to the California Environmental Quality Act and its implementing regulations.

b. When Environmental Documents Have Been Prepared

If environmental documents have been prepared for your project, please furnish us a copy for our review and files in a timely manner so that we may have sufficient time to review and comment. The following steps must also be accomplished:

1) The Lead Agency is to advise Metropolitan that it and other agencies participating in the project have complied with the requirements of CEQA prior to Metropolitan's participation.

2) You must agree to indemnify Metropolitan, its officers, engineers, and agents for any costs or liability arising out of any violation of any laws or regulations including but not limited to the California Environmental Quality Act and its implementing regulations.

15. Metropolitan's Plan-Review Cost

a. An engineering review of your proposed facilities and developments and the preparation of a letter response

giving Metropolitan's comments, requirements and/or approval that will require 8 man-hours or less of effort is typically performed at no cost to the developer, unless a facility must be modified where Metropolitan has superior rights. If an engineering review and letter response requires more than 8 man-hours of effort by Metropolitan to determine if the proposed facility or development is compatible with its facilities, or if modifications to Metropolitan's manhole(s) or other facilities will be required, then all of Metropolitan's costs associated with the project must be paid by the developer, unless the developer has superior rights.

b. A deposit of funds will be required from the developer before Metropolitan can begin its detailed engineering plan review that will exceed 8 hours. The amount of the required deposit will be determined after a cursory review of the plans for the proposed development.

c. Metropolitan's final billing will be based on actual cost incurred, and will include engineering plan review, inspection, materials, construction, and administrative overhead charges calculated in accordance with Metropolitan's standard accounting practices. If the cost is less than the deposit, a refund will be made; however, if the cost exceeds the deposit, an invoice will be forwarded for payment of the additional amount. Additional deposits may be required if the cost of Metropolitan's review exceeds the amount of the initial deposit.

16. Caution

We advise you that Metropolitan's plan reviews and responses are based upon information available to Metropolitan which was prepared by or on behalf of Metropolitan for general record purposes only. Such information may not be sufficiently detailed or accurate for your purposes. No warranty of any kind, either express or implied, is attached to the information therein conveyed as to its accuracy, and no inference should be drawn from Metropolitan's failure to comment on any aspect of your project. You are therefore cautioned to make such surveys and other field investigations as you may deem prudent to assure yourself that any plans for your project are correct.

17. Additional Information

Should you require additional information, please contact:

Civil Engineering Substructures Section
Metropolitan Water District
of Southern California
P.O. Box 54153
Los Angeles, California 90054-0153
(213) 217-6000

JEH/MRW/lk

Rev. January 22, 1989

Encl.

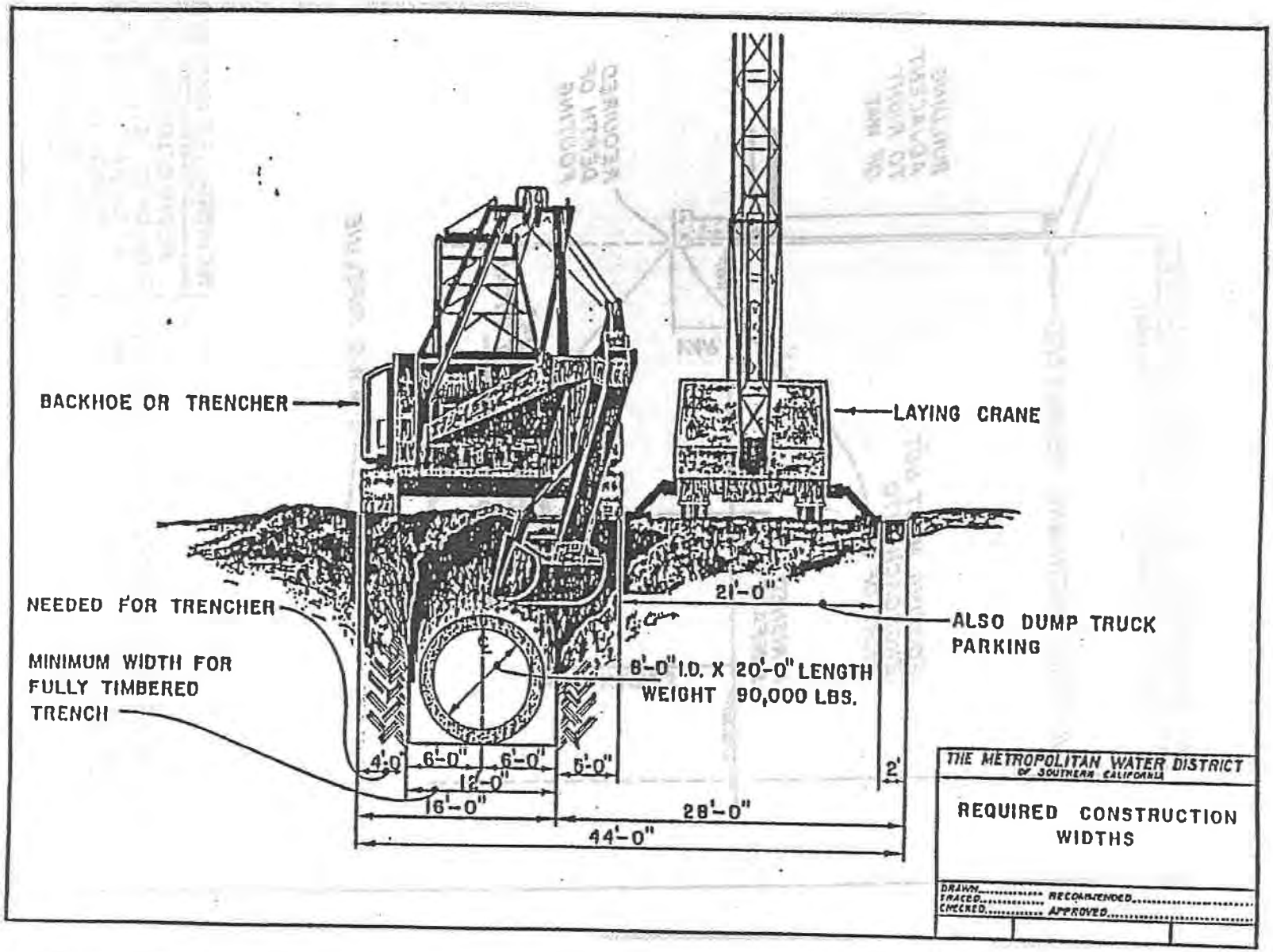
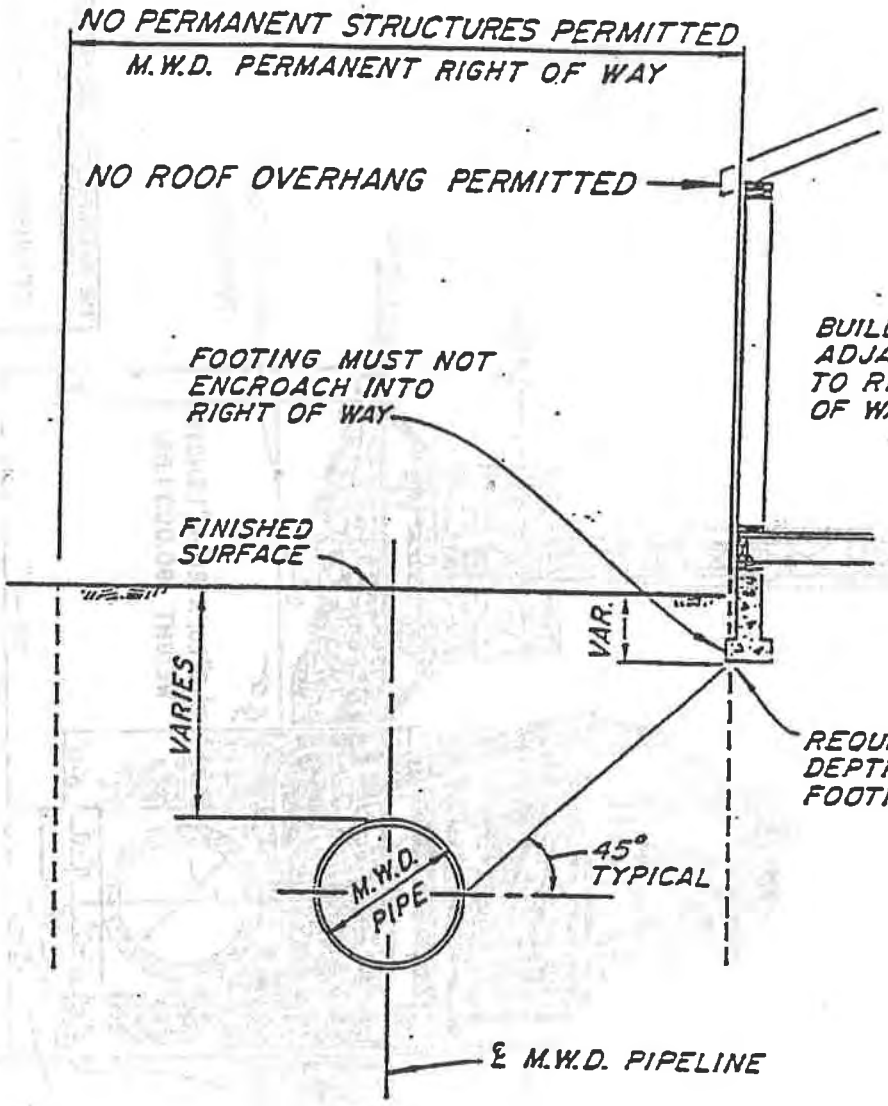

BACKHOE OR TRENCHER
LAYING CRANE
NEEDED FOR TRENCHER
MINIMUM WIDTH FOR
FULLY TIMBERED
TRENCH
21'-0"
ALSO DUMP TRUCK
PARKING
8'-0" I.D. X 20'-0" LENGTH
WEIGHT 90,000 LBS.
4'-0"
6'-0"
6'-0"
5'-0"
12'-0"
16'-0"
28'-0"
44'-0"
2'
THE METROPOLITAN WATER DISTRICT
OF SOUTHERN CALIFORNIA
REQUIRED CONSTRUCTION
WIDTHS
DRAWN
TRACED
CHECKED
RECOMMENDED
APPROVED

FIGURE 1



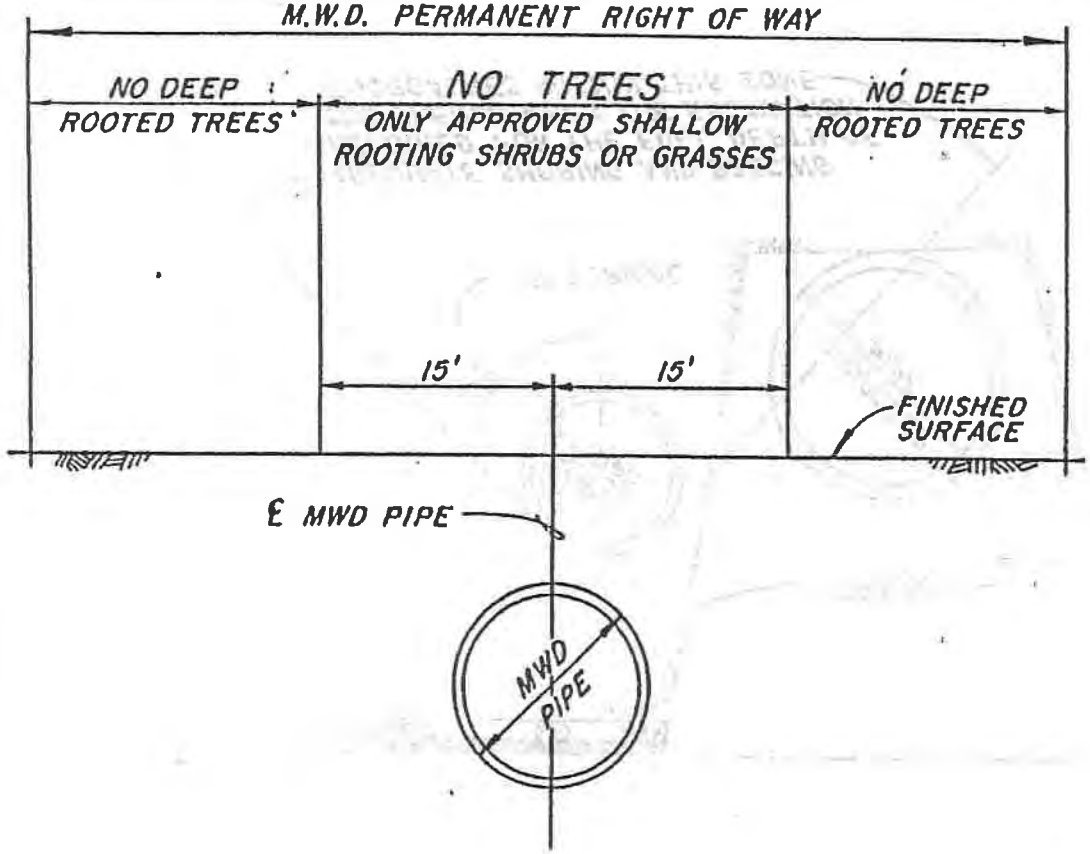
NOTE: M.W.D. PIPELINE SIZE, DEPTH, LOCATION AND WIDTH OF PERMANENT RIGHT OF WAY VARIES.

THE METROPOLITAN WATER DISTRICT OF SOUTHERN CALIFORNIA

REQUIREMENTS FOR BUILDINGS AND FOOTINGS ADJACENT TO M.W.D. RIGHT OF WAY

DRAWN _____ RECOMMENDED _____
TRACED _____
CHECKED _____ APPROVED _____

FIGURE 2



THE METROPOLITAN WATER DISTRICT OF SOUTHERN CALIFORNIA

LANDSCAPE GUIDELINES FOR M.W.D. RIGHT OF WAY

DRAWN..... RECOMMENDED.....
TRACED.....
CHECKED..... APPROVED.....

FIGURE 3

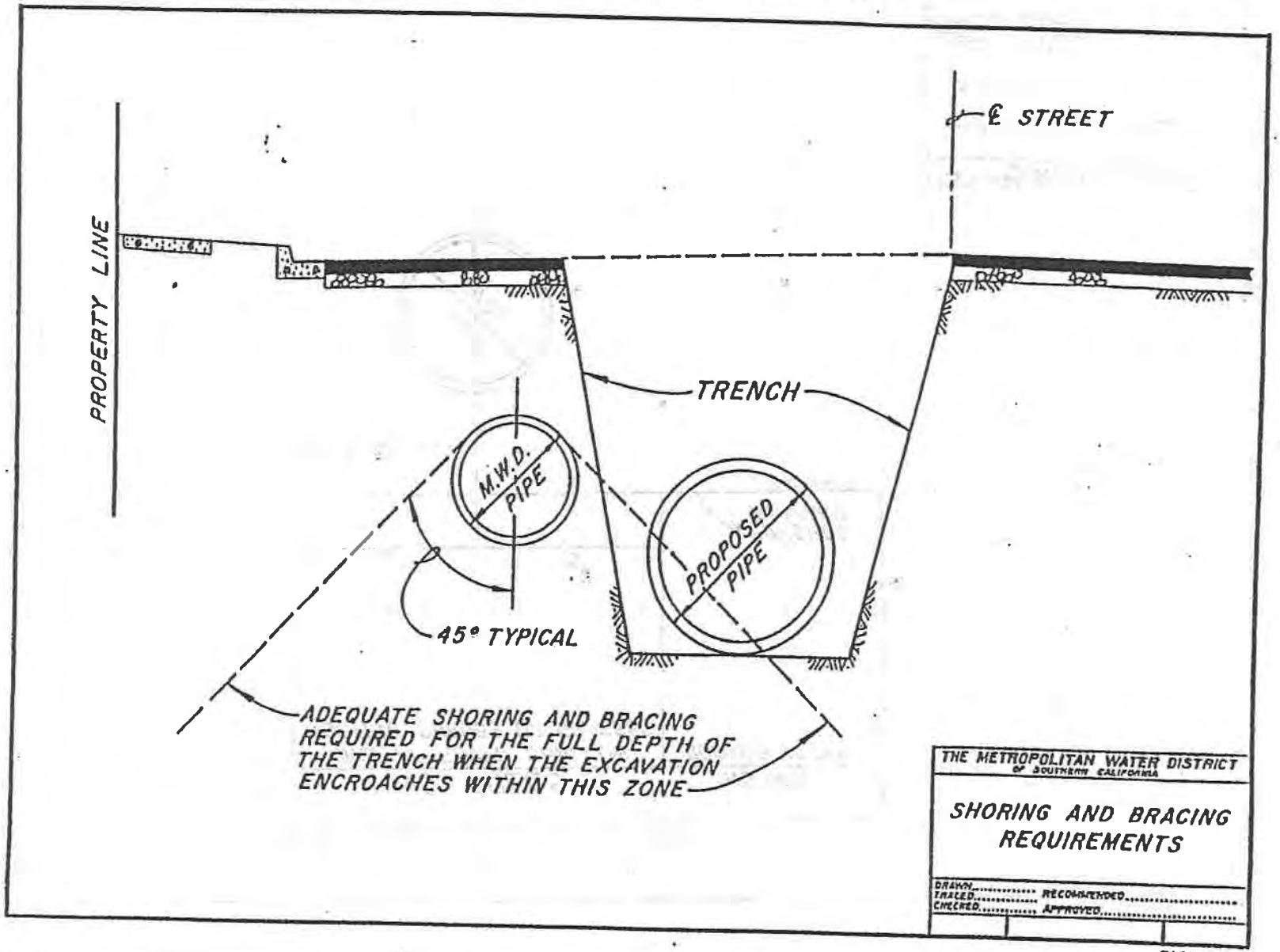

℄ STREET
PROPERTY LINE
TRENCH
M.W.D. PIPE
PROPOSED PIPE
45° TYPICAL
ADEQUATE SHORING AND BRACING REQUIRED FOR THE FULL DEPTH OF THE TRENCH WHEN THE EXCAVATION ENCROACHES WITHIN THIS ZONE
THE METROPOLITAN WATER DISTRICT OF SOUTHERN CALIFORNIA
SHORING AND BRACING REQUIREMENTS
DRAWN
TRACED
CHECKED
RECOMMENDED
APPROVED

FIGURE 4

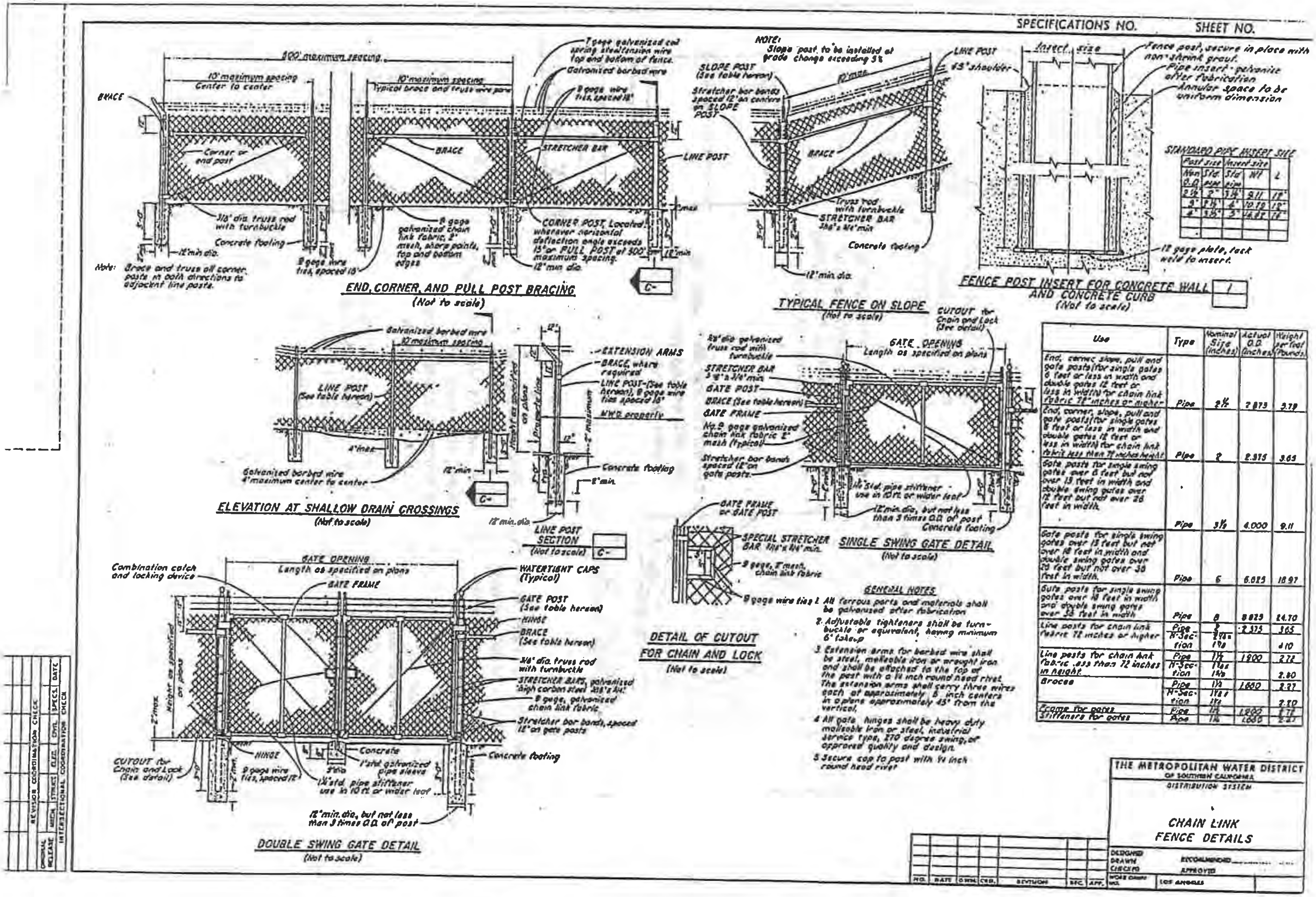
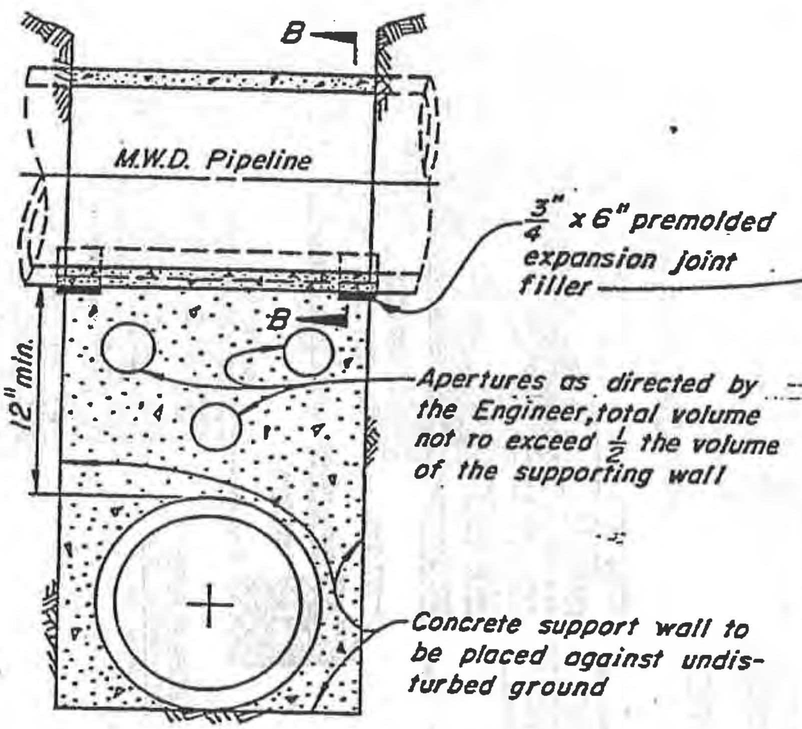
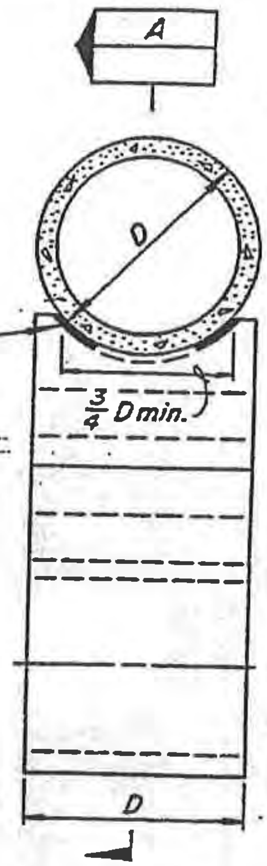

SPECIFICATIONS NO.
SHEET NO.
END, CORNER, AND PULL POST BRACING
(Not to scale)
TYPICAL FENCE ON SLOPE
(Not to scale)
FENCE POST INSERT FOR CONCRETE WALL AND CONCRETE CURB
(Not to scale)
ELEVATION AT SHALLOW DRAIN CROSSINGS
(Not to scale)
LINE POST SECTION
(Not to scale)
SINGLE SWING GATE DETAIL
(Not to scale)
DETAIL OF CUTOUT FOR CHAIN AND LOCK
(Not to scale)
DOUBLE SWING GATE DETAIL
(Not to scale)
GENERAL NOTES
1. All ferrous parts and materials shall be galvanized after fabrication
2. Adjustable tighteners shall be turnbuckle or equivalent, having minimum 6" take-up
3. Extension arms for barbed wire shall be steel, malleable iron or wrought iron and shall be attached to the top of the post with a 1/4 inch round head rivet. The extension arms shall carry three wires each at approximately 6 inch centers in a plane approximately 45° from the vertical.
4. All gate hinges shall be heavy duty malleable iron or steel, industrial service type, 270 degree swing, of approved quality and design.
5. Secure cap to post with 1/4 inch round head rivet
THE METROPOLITAN WATER DISTRICT
OF SOUTHERN CALIFORNIA
DISTRIBUTION SYSTEM
CHAIN LINK
FENCE DETAILS
LOS ANGELES

FIGURE 5

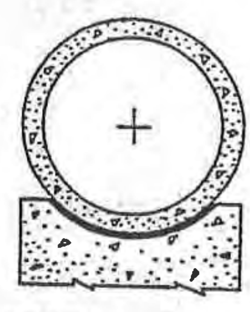


SECTION "A-A"



CROSS SECTION

1. Supporting wall shall have a firm bearing on the subgrade and against the side of the excavation.
2. Premolded expansion joint filler per ASTM D-1751-73 to be used in support for steel pipe only.
3. If trench width is 4 feet or greater, measured along centerline of M.W.D. pipe, concrete support must be constructed.
4. If trench width is less than 4 feet, clean sand backfill, compacted to 90% density in accordance with the provisions of ASTM Standard D-1557-70 may be used in lieu of the concrete support wall.



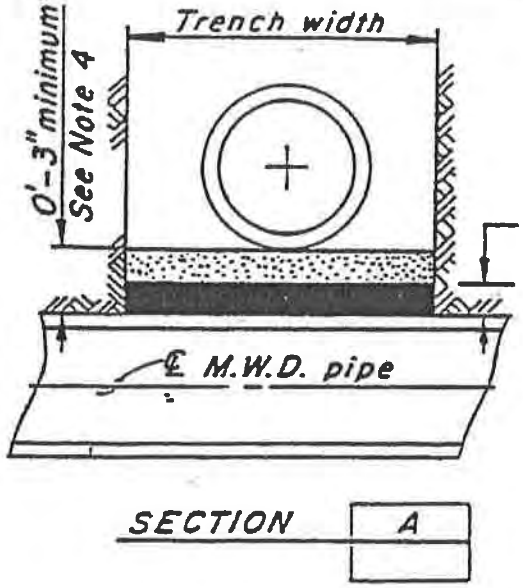
SECTION "B-B"

THE METROPOLITAN WATER DISTRICT OF SOUTHERN CALIFORNIA

TYPICAL SUPPORT FOR M.W.D. PIPELINE

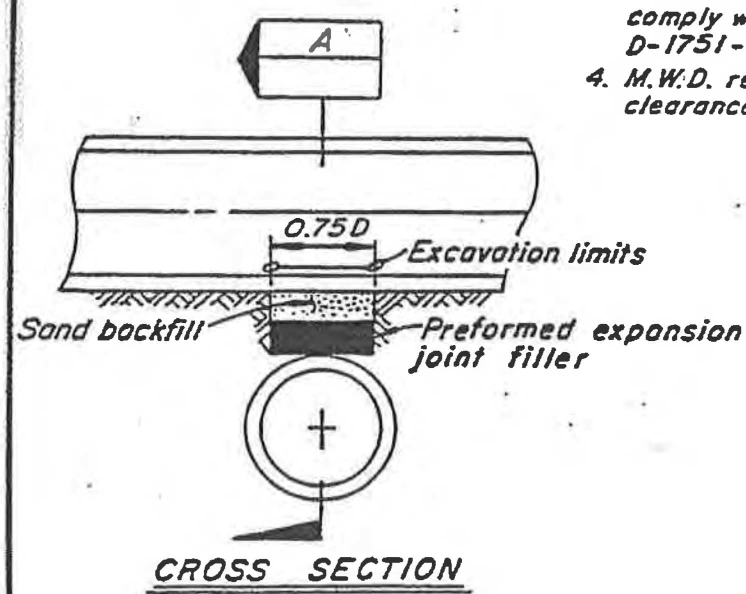
DRAWN ______ RECOMMENDED ______
TRACED ______
CHECKED ______ APPROVED ______

C-9547



NOTES

1. This method to be used where the utility line is 24" or greater in diameter and the clearance between the utility line and M.W.D. pipe is 12" or less.
2. Special protection may be required if the utility line diameter is greater than M.W.D. pipe or if the cover over the utility line to the street surface is minimal and there is 12" or less clearance between M.W.D. pipe and the utility line.
3. Preformed expansion joint filler to comply with ASTM designation D-1751-73.
4. M.W.D. requests 12" minimum clearance whenever possible.



THE METROPOLITAN WATER DISTRICT OF SOUTHERN CALIFORNIA

TYPICAL EXPANSION JOINT FILLER PROTECTION FOR OVERCROSSING OF M.W.D. PIPELINE

DRAWN ______ RECOMMENDED ______
TRACED ______
CHECKED ______ APPROVED ______

C-11632

Artesia
Avalon
Bell
Bellflower
Bell Gardens
Cerritos
Commerce
Compton
Cudahy
Downey
Hawaiian Gardens
Huntington Park
La Habra Heights
La Mirada
Lakewood
Long Beach
Lynwood
Maywood
Montebello
Norwalk
Paramount
Pico Rivera
Santa Fe Springs
Signal Hill
South Gate
Vernon
Whittier
County of Los Angeles
Port of Long Beach

GATEWAY CITIES
COUNCIL OF GOVERNMENTS

October 21, 2014

Ms. Laura Cornejo, Director, Countywide Planning
Los Angeles County Metropolitan Transportation Authority
One Gateway Plaza, MS 99-22-2
Los Angeles, CA 90012

Dear Ms. Cornejo:

Eastside Transit Corridor Phase II – Washington Route Support

The Gateway Cities Council of Governments (Gateway COG) strongly supports the Gold Line Washington Boulevard Alignment for Metro's Eastside Transit Corridor Phase II Project. This route offers significant benefits to the Southeast Los Angeles, Gateway Region as follows:

- It serves the largest number of transit-dependent and low-income populations;
- It features station locations that are within walking distance of high-density housing, commercial facilities and medium to large industrial employers;
- It increases access to major employment centers, activity centers, and destination in and around Los Angeles County;
- It provides a transit alternative to alleviate roadway congestion, parallels Interstate 5, improves mobility to enhance the quality of life, and provides a convenient and reliable alternative to the automobile;
- It provides a high potential for Transit-Oriented Development along the corridor and in the station areas;
- It serves a significantly higher population, more households and more jobs;
- It achieves smart growth principles resulting in greater reductions in air pollutants and GHG emissions;
- It leverages transit investments by providing potent connections farther east.

The Gateway Cities COG Board of Directors voted to support the Washington Alignment by action on April 7, 2010, and continues to strongly support this alternative. However, acknowledging the importance of building a viable transit system to the South and East in Los Angeles County, we are willing to continue discussions with elected and appointed representatives to consider both alternatives.

This transit project would have immeasurable benefits to the region especially to underserved, transit dependent populations and we appreciate the efforts of METRO to expeditiously deliver this project.

Sincerely,

Richard Powers, Executive Director
Gateway Cities Council of Governments

State Agencies

DEPARTMENT OF CONSERVATION

Managing California's Working Lands

Division of Oil, Gas, & Geothermal Resources

5816 CORPORATE AVENUE • SUITE 200 • CYPRESS, CALIFORNIA 90630-4731

PHONE 714 / 816-6847 • **FAX** 714 / 816-6853 • **WEB SITE** conservation.ca.gov

October 15, 2014

Laura Cornejo
Los Angeles County Metropolitan Transportation Authority
One Gateway Plaza, Mail Stop 99-22-2
Los Angeles, CA 90012

Subject:
Eastside Transit Corridor Phase 2 Project
SCH # 2010011062

Dear Ms. Cornejo:

The Department of Conservation's (Department) Division of Oil, Gas, and Geothermal Resources (Division) has reviewed the above referenced project. The Division supervises the drilling, maintenance, and plugging and abandonment of oil, gas, and geothermal wells in California. The Department offers the following comments for your consideration.

Based on information provided in the Draft Environmental Impact Statement / Environmental Impact Report, the proposed project alignments are located along roads in the cities of South San Gabriel, Montebello, South El Monte, East Los Angeles, Pico Rivera, and West Whittier. Existing well records indicate that no wells are located within approximately 300 feet of the LRT SR 60 Alignment, and that one plugged well, "Montebello City Unit" 1 (037-20988) is located approximately 150 feet west of the LRT Washington Alignment. Division information can be found at: www.conservation.ca.gov. Individual well records are available by making an appointment with our Records Clerk.

If any structure is to be located over or in close proximity of a previously plugged and abandoned well, the well may need to be plugged to current Division specifications. Section 3208.1 of the Public Resources Code authorizes the State Oil and Gas Supervisor to order the reabandonment of any previously plugged and abandoned well when construction of any structure over or in close proximity of the well could result in a hazard. The cost of reabandonment operations is the responsibility of the owner of the property upon which the structure will be located.

Furthermore, if any plugged, abandoned or unrecorded wells are damaged or uncovered during excavation or grading, remedial plugging operations may be required. If such damage or discovery occurs, the Division's district office must be

contacted to obtain information on the requirements and approval to perform remedial operations.

The possibility for future problems from oil and gas wells that have been plugged and abandoned, or reabandoned, to the Division's current specifications are remote. However, the Division suggests that a diligent effort be made to avoid building over any plugged and abandoned well.

To ensure proper review of this project, please contact Weiru Chen at (714) 816-6847 prior to construction. The Division has available an informational packet entitled, "Construction-Site Plan Review Program". This document is available on the Division's website at http://www.conservation.ca.gov/dog/for_operators/Pages/construction_site_review.aspx.

Thank you for the opportunity to comment. If you have any questions, please contact me at (714) 816-6847 or via email at Kathleen.Andrews@conservation.ca.gov.

Sincerely,

Kathleen Andrews

Kathleen Andrews
Associate Oil and Gas Engineer - Facilities

cc: DOGGR- HQ, Adele Lagomarsino
Kenneth Carlson, Environmental and Facilities Supervisor - Cypress

Nseir, Jacqueline

From: Esguerra, Margarita@Wildlife <Margarita.Esguerra@wildlife.ca.gov>
Sent: Friday, October 17, 2014 11:06 AM
To: EastSidePhase2
Cc: Pert, Ed@Wildlife; Wilson, Erinn@Wildlife; Schmoker, Kelly@Wildlife; Harris, Scott P. @Wildlife; Rains, Sarah@Wildlife; state.clearinghouse@opr.ca.gov; Duarte, Dolores@Wildlife
Subject: Eastside Corridor Expansion Phase 2 DEIR SCH No. 2014031051
Attachments: EastsideCorridorExpansionPhase2DEIRSCHNo.2014031051.pdf

Ms. Cornejo,

Copy of Comment Letter sent to your end. Original will follow.
For questions, please contact Kelly Schmoker at (949) 581-1015.

Thank you.

Margarita Esguerra, OT
Department of Fish & Wildlife
South Coast Region
3883 Ruffin Road, San Diego CA, 92123
T (858) 467-4253 F (858) 467-4239
New Work Schedule: 7:30am-5:00pm (Off every 2nd & 4th Mondays of the month)

State of California – Natural Resources Agency
DEPARTMENT OF FISH AND WILDLIFE
South Coast Region
3883 Ruffin Road
San Diego, CA 92123
(858) 467-4201
www.wildlife.ca.gov

EDMUND G. BROWN JR., Governor
CHARLTON H. BONHAM, Director

October 17, 2014

Ms. Laura Cornejo, Director
Countywide Planning
Los Angeles Metropolitan Transportation Authority
One Gateway Plaza, MS 99-22-2
Los Angeles, CA 90012
E-mail: eastsidephase2@metro.net

Subject: Comments on the Draft Environmental Impact Report for the for the Eastside Transit Corridor Phase 2 Project, Irwindale, Los Angeles County, (SCH No. 2014031051).

Dear Ms. Cornejo:

The California Department of Fish and Wildlife (Department) has reviewed the above-referenced Draft Environmental Impact Report (DEIR) and for Eastside Transit Corridor Phase 2 Project dated August 22, 2014. The Metropolitan Transportation Authority (Metro) is the lead agency for the DEIR under the California Environmental Quality Act (CEQA).

Metro proposes to implement a light rail transit (LRT) project that would extend the Metro Gold Line Eastside Extension from the existing Atlantic Station to the east by 6.9 to 9.5 miles. The proposed build alternatives would terminate near State Route 60 (SR 60)/Peck Road or Washington Boulevard and Lambert Road. The Eastside Transit Corridor Phase 2 project area encompasses over 50 square miles of communities to the east and southeast of downtown Los Angeles. It includes portions of the cities of Commerce, Los Angeles, Montebello, Monterey Park, Pico Rivera, Rosemead, Santa Fe Springs, South El Monte, Whittier, and portions of unincorporated Los Angeles County, which include East Los Angeles and west Whittier-Los Nietos. Alternatives studied include a No Build Alternative, a Transportation System Management (TSM) Alternative, and two LRT build alternatives as follows: 1) No Build Alternative, 2) TSM Alternative, 3) State Route 60 (SR 60) LRT Alternative) and 4) Washington Boulevard LRT Alternative.

No Build Alternative: The No Build Alternative is the future scenario without either of the proposed build alternatives. The No Build Alternative does not include any major service improvements or new transportation infrastructure.

Transportation System Management (TSM) Alternative: The TSM Alternative includes all of the transit and roadway provisions of the No Build Alternative, plus proposed enhancements to existing bus service.

The SR 60 LRT Alternative (SR60): The SR 60 Alternative would extend the Metro Gold Line Eastside Extension, a dedicated, dual track LRT system with overhead catenary wiring, approximately 6.9 miles east to Peck Road. This alternative includes the construction of 4 new stations, parking, power substations, and a maintenance yard. Construction will include potential impacts the Whittier Narrows Recreation Area, a large natural area known to support significant biological resources located along SR 60 as well as the Rio Hondo and San Gabriel Rivers. In addition, Puente Hills, located just south of SR 60 and east of I-605, is designated a Significant Ecological Area by the County of Los Angeles.

The Washington Boulevard LRT Alternative (WBLRT): The WBLRT Alternative would extend the Metro Gold Line Eastside Extension, a dedicated, dual track LRT system with overhead catenary wiring, approximately 9.5 miles east to the city of Whittier at Lambert Road. There are 6 stations proposed, numerous traction power substations, and a maintenance yard. This alternative is proposed to operate in an aerial configuration with columns located in the roadway median or sidewalks, as well as in an at-grade configuration where the street widths are sufficient to accommodate the alignment and potential stations. Potential impacts associated with the WBLRT Alternative include crossing the Rio Hondo and San Gabriel Rivers, as well as the associated groundwater spreading grounds located adjacent to these river channels which provide significant biological resources, especially for migratory birds

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

Biological Resources.

1. Regional Setting. CEQA (Guidelines §§ 15125(c)) require the Lead Agency to include information on the regional setting that is critical to an assessment of environmental impacts, with special emphasis placed on resources that are rare or unique to the region must to be incorporated into the DEIR. The DEIR should include measures to fully avoid and otherwise protect Rare Natural Communities from project-related impacts. The Department considers these communities as threatened habitats having both regional and local significance. Plant communities, alliances and associations with a state-wide ranking of S-1, S-2, S-3 and S-4 should be considered sensitive and declining at the local and regional level. These ranks can be obtained by querying the California Natural Diversity Data Base, or by may be included in Sawyer, et al. 2008.

a) Rare Natural Communities. The Department considers Alluvial Fan Sage Scrub (Holland) an extremely rare Natural Community with very little acreage remaining. A 1998 study (Safford et al.) indicated that there were 528-acres of Alluvial Fan Sage Scrub left in the San Gabriel River system at that time. The DEIR should analyze how many acres are left, how many acres are currently protected, and the significance of the loss or any indirect impacts (noise, lighting, shade, etc.) to the local area as part of a Regional Setting analysis and under the cumulative effects analysis. A cumulative effects analysis should be developed as described under CEQA Guidelines, section 15130.

b) Focused Surveys. Appendix U, page 31 states "No special-status plants or animals were observed during the field review. It should be noted that the purpose of the field review was to evaluate the habitat present to determine its suitability to support special-status species. Focused surveys for special-status species were not conducted."

Focused surveys for all sensitive species with any potential to occur on the Project, including western pond turtle (*Actinemys marmorata*), southern tarplant (*Centromadia parryi (Greene) ssp. australis (Keck)*), southern mountain skullcap (*Scutellaria bolanderi ssp. austromontana)* should be conducted during the appropriate season, following accepted protocols. The results of the surveys, including an analysis of specific impacts (e.g. number of individuals that will be impacted and acreage) and proposed mitigation measures, if appropriate, should be disclosed in the DEIR. This information will allow the Department to provide meaningful feedback to the Lead Agency as to the adequacy of any avoidance, minimization and/or mitigation measures proposed in the DEIR.

The Project has the potential to impact bats either directly or indirectly the Department recommends surveys for bats are conducted and the results of any bat species present be disclosed in the DEIR. If bat species are detected, specific avoidance, minimization and mitigation measures specific to the species present, should be included in the DEIR. The Department recommends specific mitigation measures, other than pre-construction surveys and exclusion, be included in the DEIR if the surveys locate bats within areas affected either directly or indirectly, by the proposed Project.

c) Construction-related Impacts. The DEIR should include an analysis of impacts related to pile driving near water ways (both channelized and natural) as well as bridges that support bats and/or nesting birds. Pile driving and other construction techniques, have the potential to significantly impact terrestrial and aquatic species. These impacts should be analyzed separately and specifically to non-aquatic as well as aquatic species as the sound/shock waves can attenuate in water and puncture air bladders.

d) California and Federal Endangered Species Act. The DEIR does not seem to include many Threatened and Endangered species known from the region in its assessment. CESA prohibits the take of listed species. The Department recommends protocol surveys be conducted for Least Bell's vireo, willow flycatcher, and any other listed species that has the potential to be onsite, even if degraded habitat is present. Both Least Bell's vireo and willow flycatcher are documented in the immediate vicinity of this Project.

The Department considers adverse impacts to a species protected by the CESA, for the purposes of CEQA, to be significant without mitigation. As to CESA, take of any endangered, threatened, or candidate species that results from the project is prohibited, except as authorized by state law (Fish and Game Code, §§ 2080, 2085). Consequently, if the Project, Project construction, or any Project-related activity during the life of the Project will result in take of a species designated as endangered or threatened, or a candidate for listing under CESA, the Department recommends that the project proponent seek appropriate take authorization under CESA prior to implementing the project. Appropriate authorization from the Department may include an incidental take permit (ITP) or a consistency determination in certain circumstances, among other options (Fish and Game Code §§ 2080.1, 2081, subds. (b),(c)). Early consultation is encouraged, as significant modification to a project and mitigation measures may be required in order to obtain a CESA Permit. Revisions to the Fish and Game Code, effective January 1998, may require that the Department issue a separate CEQA document for the issuance of an ITP unless the project CEQA document addresses all project impacts to CESA-listed species and specifies a mitigation monitoring and reporting program that will meet the requirements of an ITP. For these reasons, biological mitigation monitoring and reporting proposals should be of sufficient detail and resolution to satisfy the requirements for a CESA ITP.

Vegetation Survey and Map. The DEIR and the Biological Resources Technical Memorandum (Appendix U of the DEIR) should include a vegetation or habitat map of the project area. The Department requests the entire project footprint for each Alternative, plus a 500-foot buffer, be mapped using the *Manual of California Vegetation* second edition protocol (https://www.dfg.ca.gov/biogeodata/vegcamp/veg_manual.asp). The method of vegetation classification presented in the *Manual of California Vegetation* second edition represents the vegetation classification standards for vegetation maps adopted by the State that meet the National Vegetation Classification System standards followed by federal agencies. Once the habitat is identified, the Department can provide meaningful feedback regarding impacts to biological resources.

e) Rare Plant Surveys The Department recommends that rare plant surveys be conducted within the Project footprint and temporary construction sites following The *Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Natural Communities.* The above-referenced protocol includes visiting the site at different times of the year to capture the various

bloom times of plants, visiting known reference sites to verify when certain plants are actually blooming, and spending adequate time on the Project site to ensure a through species list (e.g., one person-hour per eight acres per survey date is needed for a comprehensive field survey in grassland with medium diversity and moderate terrain, with additional time allocated for species identification[1]).

f) Waters of the State. The DEIR indicates several natural and man-made drainage features may be impacted by the various Project Alternatives. The Department may consider these impacts jurisdictional under Section 1600 of the Fish and Game Code. Please consult with the Department to further discuss jurisdiction of the site.

   i) The proposed Project area supports aquatic, riparian, or wetland habitats; therefore a jurisdictional delineation of the Project site and any associated riparian habitats should be included in the DEIR. The delineation should be conducted pursuant to the U. S. Fish and Wildlife Service wetland definition adopted by the Department.[2] Please note that some wetland and riparian habitats subject to the Department's authority may extend beyond the jurisdictional limits of the U.S. Army Corps of Engineers.

   ii) The Department also has regulatory authority over activities in streams and/or lakes that will divert or obstruct the natural flow, or change the bed, channel, or bank (which may include associated riparian resources) of a river or stream, or use material from a streambed. For any such activities, the project applicant (or "entity") must provide written notification to the Department pursuant to section 1600 et seq. of the Fish and Game Code. Based on this notification and other information, the Department determines whether a Lake and Streambed Alteration Agreement (LSAA) with the applicant is required prior to conducting the proposed activities. The Department's issuance of a LSAA for a project that is subject to CEQA will require CEQA compliance actions by the Department as a Responsible Agency. The Department as a Responsible Agency under CEQA may consider the local jurisdiction's (lead agency) Negative Declaration or Environmental Impact Report for the project. To minimize additional requirements by the Department pursuant to section 1600 et seq. and/or under CEQA, the document should fully identify the potential impacts to the stream or riparian resources and provide adequate avoidance, mitigation, monitoring, and reporting commitments for issuance of the LSA.[2]

---

[1] http://www.dfg.ca.gov/biogeodata/cnddb/pdfs/Protocols_for_Surveying_and_Evaluating_Impacts.pdf

[2] Cowardin, Lewis M., et al. 1979. Classification of Wetlands and Deepwater Habitats of the United States. U.S. Department of the Interior, Fish and Wildlife Service.

[2] A notification package for a LSA may be obtained by accessing the Department's web site at www.wildlife.ca.gov/habcon/1600

Mitigation.

2. Adequacy of Mitigation. The DEIR cites following local municipalities tree-replacement ordinances as mitigation for removal of large numbers of both native and non-native trees. The Department considers woodlands distinct biological communities, consisting of trees, shrubs, vines, and herbaceous understory vegetation, as well as dead woody debris and other habitat providing structures. The DEIR only considers the value of the trees, and does not appear to characterize the value of these unique communities in a biological setting. The DEIR should provide a thorough assessment of these communities, utilizing the *Manual of California Vegetation*, second edition to describe and map vegetation communities and associated understory vegetation (e.g., size, composition, density). The Department recommends any mitigation required for 'tree removal', instead require mitigation of the community impacted and include specific details as to the proposed mitigation (e.g. location, planting palette, acreage, success criteria, monitoring requirements). Replanting trees on a 1:1 basis may not mitigate on a biological level, impacts to a woodland community. The DEIR should be specific as to the biologic resources contained within the communities impacted and how the project proposes to mitigate those impacts.

   g) Long-term Sustainability and Value of Mitigation Proposed. The DIER should include specific information regarding proposed mitigation to offset direct impacts to habitat removal, such as loss of habitat from a new bridge over the Rio Hondo. The Project DEIR should propose feasible mitigation measures that are capable of being implemented, and these should be formulated in the document, not deferred to a later time (CEQA Guidelines, section 15226.4). The Department recommends shading impacts be considered permanent impacts, as vegetation typically does not flourish underneath structures that block sunlight.

   h) Invasive Species Management. The Department recommends the Project include measures to avoid the spread of non-native and invasive plants and animals from construction and maintenance related activities associated with this project. The DEIR should include a discussion of any measures proposed to limit introduction and spread on invasive species in the DEIR.

Thank you for this opportunity to provide comments. Please contact Ms. Kelly Schmoker, Senior Environmental Scientist (Specialist), at (949) 581-1015 or Kelly.schmoker@wildlife.ca.gov if you should have any questions and for further coordination on the proposed Project.

Sincerely,

Ed Pert
Regional Manager
South Coast Region

ec: Ms. Erinn Wilson, CDFW, Los Alamitos
Ms. Kelly Schmoker, CDFW, Mission Viejo
Mr. Scott Harris, CDFW, Pasadena
Ms. Sarah Rains, CDFW, Newbury Park
Mr. Scott Morgan, State Clearinghouse, Sacramento

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

Edmund G. Brown Jr.
Governor

Ken Alex
Director

Memorandum

Date: August 25, 2014

To: All Reviewing Agencies

From: Scott Morgan, Director

Re: SCH # **2010011062**
Eastside Transit Corridor Phase 2 Project

The State Clearinghouse forwarded the above-mentioned project to your agency for review on **August 22, 2014** with incorrect review dates. Please make note of the following information for your files:

Review period ends: **October 21, 2014**

We apologize for any inconvenience this may have caused. All other project information remains the same.

cc: Ms. Laura Cornejo
Los Angeles County Metropolitan Transportation Authority
One Gateway Plaza, Mail Stop 99-22-2
Los Angeles, CA 90012

Print Form

Appendix C

Notice of Completion & Environmental Document Transmittal

Mail to: State Clearinghouse, P.O. Box 3044, Sacramento, CA 95812-3044 (916) 445-0613
For Hand Delivery/Street Address: 1400 Tenth Street, Sacramento, CA 95814

SCH #2010011062

Project Title: Eastside Transit Corridor Phase 2 Project
Lead Agency: Los Angeles County Metropolitan Transportation Authority
Contact Person: Ms. Laura Cornejo
Mailing Address: One Gateway Plaza, Mail Stop 99-22-2
Phone: (213) 922-2885
City: Los Angeles Zip: 90012 County: Los Angeles

Project Location: County: Los Angeles City/Nearest Community: Montebello, South El Monte, Whittier, etc.
Cross Streets: N/A Zip Code: N/A
Longitude/Latitude (degrees, minutes and seconds): 34 °0 '45.9 "N / 118 °6 '32.6 "W Total Acres: N/A
Assessor's Parcel No.: N/A Section: 11 Twp.: 2S Range: 12W Base: San Bern.
Within 2 Miles: State Hwy #: 5, 60, 605, 710 Waterways: San Gabriel River, Rio Hondo
Airports: N/A Railways: Metro, BNSF, UPRR Schools: MUSD,GSD,ERUSD etc.

RECEIVED
AUG 22 2014
STATE CLEARINGHOUSE

Document Type:
CEQA: ☐ NOP ☒ Draft EIR NEPA: ☐ NOI Other: ☒ Joint Document
☐ Early Cons ☐ Supplement/Subsequent EIR ☐ EA ☐ Final Document
☐ Neg Dec (Prior SCH No.) ☒ Draft EIS ☐ Other:
☐ Mit Neg Dec Other: ☐ FONSI

Local Action Type:
☐ General Plan Update ☐ Specific Plan ☐ Rezone ☐ Annexation
☐ General Plan Amendment ☐ Master Plan ☐ Prezone ☐ Redevelopment
☐ General Plan Element ☐ Planned Unit Development ☐ Use Permit ☐ Coastal Permit
☐ Community Plan ☐ Site Plan ☐ Land Division (Subdivision, etc.) ☒ Other: LPA

Development Type:
☐ Residential: Units _____ Acres _____
☐ Office: Sq.ft. _____ Acres _____ Employees _____
☐ Commercial: Sq.ft. _____ Acres _____ Employees _____
☐ Industrial: Sq.ft. _____ Acres _____ Employees _____
☐ Educational: _____
☐ Recreational: _____
☐ Water Facilities: Type _____ MGD _____
☒ Transportation: Type Light Rail Transit Project
☐ Mining: Mineral _____
☐ Power: Type _____ MW _____
☐ Waste Treatment: Type _____ MGD _____
☐ Hazardous Waste: Type _____
☐ Other: _____

Project Issues Discussed in Document:
☒ Aesthetic/Visual ☒ Fiscal ☒ Recreation/Parks ☒ Vegetation
☐ Agricultural Land ☒ Flood Plain/Flooding ☒ Schools/Universities ☒ Water Quality
☒ Air Quality ☐ Forest Land/Fire Hazard ☐ Septic Systems ☒ Water Supply/Groundwater
☒ Archeological/Historical ☒ Geologic/Seismic ☐ Sewer Capacity ☒ Wetland/Riparian
☒ Biological Resources ☐ Minerals ☒ Soil Erosion/Compaction/Grading ☒ Growth Inducement
☐ Coastal Zone ☒ Noise ☒ Solid Waste ☒ Land Use
☒ Drainage/Absorption ☒ Population/Housing Balance ☒ Toxic/Hazardous ☒ Cumulative Effects
☒ Economic/Jobs ☒ Public Services/Facilities ☒ Traffic/Circulation ☒ Other: Env. Justice

Present Land Use/Zoning/General Plan Designation:
Commercial, Residential, Industrial, and Recreation

Project Description: *(please use a separate page if necessary)*
Notice of Availability for a Draft Environmental Impact Statement/Environmental Impact Report (EIS/EIR) for proposed light rail transit improvements to the Eastside Transit Corridor Phase 2 project area in Los Angeles County, California. The proposed Eastside Transit Corridor Phase 2 project would extend the Metro Gold Line Eastside Extension from the existing Atlantic Station to the east by 6.9 to 9.5 miles. The four alternatives evaluated in the EIS/EIR include: the No Build Alternative, Transportation System Management (TSM) Alternative, SR 60 Light Rail Transit (LRT) Alternative, and Washington Boulevard LRT Alternative. The Los Angeles County Metropolitan Transportation Authority (Metro) Board of Directors will consider adopting a Locally Preferred Alternative (LPA) based on the findings of the Draft EIS/EIR.

State Clearinghouse Contact: (916) 445-0613

State Review Began: 8 - 22 - 2014

21

SCH COMPLIANCE 10 - 6 - 2014

Note: 60 day Review

Please note State Clearinghouse Number (SCH#) on all Comments

SCH#: 2010011062

Please forward late comments directly to the Lead Agency

AQMD/APCD 33

(Resources: 9/23)

SL

Project Sent to the following State Agencies

X	Resources		State/Consumer Svcs
	Boating & Waterways		General Services
	Coastal Comm		Cal EPA
	Colorado Rvr Bd	X	ARB: ALL Projects
X	Conservation	X	ARB: Transportation Projects
X	CDFW # 5		ARB: Major Industrial Projects
	Delta Protection Comm		SWRCB: Div. of Drinking Water
	Cal Fire		SWRCB: Div. Financial Assist.
X	Historic Preservation		SWRCB: Wtr Quality
X	Parks & Rec		SWRCB: Wtr Rights
	Central Valley Flood Prot.	X	Reg. WQCB # 4
	Bay Cons & Dev Comm.		Toxic Sub Ctrl-CTC
X	DWR		Yth/Adlt Corrections
	OES		Corrections
	Resources, Recycling and Recovery		

	Bus Transp Hous		Independent Comm
	Aeronautics		Energy Commission
	CHP	X	NAHC
X	Caltrans # 7	X	Public Utilities Comm
	Trans Planning		State Lands Comm
	Housing & Com Dev		Tahoe Rgl Plan Agency
	Food & Agriculture		
			Conservancy
			Other:

STATE OF CALIFORNIA

GOVERNOR'S OFFICE *of* PLANNING AND RESEARCH

STATE CLEARINGHOUSE AND PLANNING UNIT

EDMUND G. BROWN JR.
GOVERNOR

KEN ALEX
DIRECTOR

October 22, 2014

Laura Cornejo
Los Angeles County Metropolitan Transportation Authority
One Gateway Plaza, Mail Stop 99-22-2
Los Angeles, CA 90012

Subject: Eastside Transit Corridor Phase 2 Project
SCH#: 2010011062

Dear Laura Cornejo:

The State Clearinghouse submitted the above named Draft EIR to selected state agencies for review. The review period closed on October 21, 2014, and no state agencies submitted comments by that date. This letter acknowledges that you have complied with the State Clearinghouse review requirements for draft environmental documents, pursuant to the California Environmental Quality Act.

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

Sincerely,

Scott Morgan
Director, State Clearinghouse

1400 10th Street P.O. Box 3044 Sacramento, California 95812-3044
(916) 445-0613 FAX (916) 323-3018 www.opr.ca.gov

Document Details Report
State Clearinghouse Data Base

SCH# 2010011062
Project Title Eastside Transit Corridor Phase 2 Project
Lead Agency Metropolitan Transportation Authority

Type EIR Draft EIR

Description Note: 60 Day Review

Proposed light rail transit improvements to the Eastside Transit Corridor Phase 2 project area in Los Angeles County, California. The project would provide the project area with improved fixed-guideway east-west transit service from the Metro Gold Line Eastside Extension (Phase 1) to cities farther east of the City of Los Angeles. The four alternatives identified for further consideration in the EIR include: the No-Build Alternative, Transporation System Management (TSM) Alternative, SR-60 LRT Alternative, and Washington Boulevard LRT Alternative. The Los Angeles County Metropolitan Transportation Authority Board of Directors will adopt a Locally Preferred Alternative (LPA) based on the findings of the Draft EIR.

Lead Agency Contact

Name Laura Cornejo
Agency Los Angeles County Metropolitan Transportation Authority
Phone 213 922 2885 **Fax**
email
Address One Gateway Plaza, Mail Stop 99-22-2
City Los Angeles **State** CA **Zip** 90012

Project Location

County Los Angeles
City Montebello, South El Monte, Whittier
Region
Lat / Long 34° 0' 45.9" N / 118° 6' 32.6" W
Cross Streets
Parcel No.
Township 2S **Range** 12W **Section** 11 **Base** San Bern

Proximity to:

Highways Hwy 5, 60, 605, 710
Airports
Railways Metro, BNSF, UPRR
Waterways San Gabriel River, Rio Hondo
Schools MUSD, GSD, ERUSD
Land Use Commercial, Residential, Industrial, and Recreation

Project Issues Aesthetic/Visual; Air Quality; Archaeologic-Historic; Biological Resources; Drainage/Absorption; Economics/Jobs; Fiscal Impacts; Flood Plain/Flooding; Geologic/Seismic; Noise; Population/Housing Balance; Public Services; Recreation/Parks; Schools/Universities; Soil Erosion/Compaction/Grading; Solid Waste; Toxic/Hazardous; Traffic/Circulation; Vegetation; Water Quality; Water Supply; Wetland/Riparian; Growth Inducing; Landuse; Cumulative Effects; Other Issues

Reviewing Agencies Resources Agency; Department of Conservation; Department of Fish and Wildlife, Region 5; Office of Historic Preservation; Department of Parks and Recreation; Department of Water Resources; Caltrans, District 7; Air Resources Board; Air Resources Board, Transportation Projects; Regional Water Quality Control Board, Region 4; Native American Heritage Commission; Public Utilities Commission

Date Received 08/22/2014 **Start of Review** 08/22/2014 **End of Review** 10/21/2014

CALIFORNIA
High-Speed Rail Authority
Southern California Regional Office

October 16, 2014

Laura Cornejo
Project Manager
Metro
One Gateway Plaza, 99-22-02
Los Angeles, CA 90012

Dear Ms. Cornejo:

SUBJECT: Gold Line, Eastside Transit Corridor Phase 2

The California High-Speed Rail Authority (Authority) is working to connect major regions of the State through fast, reliable, electric high-speed train service. The Authority has worked with regional partners, including Metro, to find ways to collectively lay the groundwork for a statewide rail modernization program that enables local and regional rail lines to meet their direct transit needs while at the same time planning for future connections to California's high-speed rail system. The Metro Gold Line, Transit Corridor Phase 2 is a prime example of Metro's goal to improve mobility in the corridor by linking the communities east of Los Angeles with the regional transit network.

After reviewing the Eastside Transit Corridor Phase 2 Draft EIR/EIS, the Authority has identified that the proposed SR-60 LRT, North Side Design Variation and one of the High-Speed Rail (HSR) alternatives for the Los Angeles to San Diego Section both parallel the SR-60 corridor. This alternative was presented as an option in the March 2011 Preliminary Alternatives Analysis for the Los Angeles to San Diego section via the Inland Empire and was recommended to be carried forward by the Authority. While we understand Metro's rationale for the proposed alternative, continued coordination is required to minimize potential future conflicts in the area potentially shared by both projects.

The Los Angeles to San Diego section of the High-Speed Rail System is currently undergoing refinements to alternatives previously identified and we believe this is the perfect opportunity for early coordination with Metro as well as development of strategies for Right-of-Way preservation for both projects.

The Authority appreciates your partnership as we work to address the state's mobility needs, keeping California at the forefront of smart infrastructure development. Please do not hesitate to contact me at (213) 308-4507 or michelle.boehm@hsr.ca.gov with any questions or concerns.

Sincerely,

Michelle Boehm

MICHELLE BOEHM
Southern California Regional Director
California High-Speed Rail Authority

SOUTHERN CALIFORNIA EDISON
An EDISON INTERNATIONAL™ Company

Marissa Castro-Salvati
Local Public Affairs
1000 Potrero Grande Drive
Monterey Park, CA 91754

October 20, 2014

Ms. Laura Cornejo, Director Countywide Planning
Los Angeles County Metropolitan Transportation Authority (Metro)
One Gateway Plaza, MS 99-22-02
Los Angeles, CA 90012
Eastsidephase2@metro.net

RE: Eastside Transit Corridor Phase 2 Project Draft EIS/EIR

Dear Ms. Cornejo:

Southern California Edison (SCE) appreciates the opportunity to review and provide comments on the Draft Environmental Impact Statement/Environmental Impact Report (EIS/EIR) for the Eastside Transit Corridor Phase 2 Project. The proposed project would implement a light rail transit (LRT) project that would extend the Metro Gold Line Eastside Extension from the existing Atlantic Station to the east by 6.9 to 9.5 miles. The proposed build alternatives would terminate near State Route 60 (SR 60)/Peck Road or Washington Boulevard and Lambert Road. The Eastside Transit Corridor Phase 2 project area includes portions of the cities of Commerce, Los Angeles, Montebello, Monterey Park, Pico Rivera, Rosemead, Santa Fe Springs, South El Monte, Whittier, and portions of unincorporated Los Angeles County, which include East Los Angeles and west Whittier-Los Nietos.

SCE's Electrical System within Project Area
Within the project area, SCE maintains and operates a transmission system, which includes 500 kilovolt (kV), 220 kV, and 66 kV transmission lines, distribution lines, and communication facilities. SCE is concerned that the proposed light rail system may impose constraints on SCE's ability to access, maintain, and operate its current and future facilities. Figure 2-4 SR 60 LTR Alternative and Figure 2-8 Washington Boulevard LRT Alternative were modified with numbers illustrating the potential crossings of SCE's transmission lines (greater 50 kV) for each alternative.

The Draft EIR/EIS Page 2-11 mentions that the "SR 60 LRT Alternative would travel beneath transmission lines at two locations." The Draft EIR/EIS should be corrected to state that the SR 60 LRT Alternative may cross up to six SCE transmission line corridors and is in very close proximity to our Mesa Substation (a critical facility within SCE's electrical system). SCE is especially concerned about Crossings #2, #3, and #4, as well as the LRT's proximity to the Mesa Substation. At Crossing #2, SCE has a number of 66 kV and 220 kV transmission lines. Crossings #3 and #4 are major utility corridors that contain 66 kV, 220 kV, and the recently constructed Tehachapi Renewable Transmission Project (TRTP) 500 kV transmission lines. In addition, the North Side 60 Design Variation's close proximity to SCE's existing Mesa Substation and transmission lines are of concern.

The Washington Alternative crosses four SCE transmission line corridors and the proposed Commerce Maintenance Yard would be located within an existing transmission corridor. SCE is especially concerned about Crossings #2 and the Commerce Maintenance Yard. Crossing # 2 contains 66 and 220 kV transmission lines. The proposed Commerce Maintenance Yard contains existing 66 kV and 220 kV transmission lines and Metro's track allocation procedures may interfere with the accessibility of SCE's facilities and land during routine maintenance and emergency situations.

Safety Concerns
SCE considers the North American Electric Reliability Corporation (NERC) standards and General Order (GO) 95 Rule 13 and Rule 31.1 when engineering transmission lines. The California Public Utilities Commission's (CPUC) GO 95 establishes rules and regulations for the overhead line design, construction, and maintenance which will ensure adequate service and secure safety to persons engaged in the construction, maintenance, operation or use of overhead lines and to the public in general. NERC Standard FAC-008-3 (Facility Ratings) requires that transmission lines are designed with future operating conditions or upgrades in mind. SCE established its own minimum vertical and radial clearance from the top of light rail contact wire to the bottom of SCE's lowest conductor, which is a minimum of 10 feet for 66 kV transmission lines, 14 feet for 220 kV transmission lines, and 19.7 feet for 500 kV transmission lines.

In addition, GO 95 has established minimum vertical clearance requirements for the railroad track to the lowest transmission line conductor—30 feet for 66 kV and 220 kV transmission lines, and 36.25 feet for 500 kV transmission lines. Please note, depending on the nature of the conflict, SCE may require additional clearances beyond the measurements mentioned above.

Page 2-11 of the Draft EIR/EIS states that "a minimum 12 feet of clearance would be provided between the LRT structure, including the overhead catenary service, wires, and the lowest point of the transmission lines." The proposed LRT build alternatives (SR 60 and Washington Boulevard) would cross below multiple 66 kV and 220 kV transmission lines and the SR 60 Alternative would also cross under 500 kV transmission lines. SCE has concerns regarding the application of the minimum required clearance between SCE's high voltage transmission lines and Metro's LRT system. Metro must consider GO 95 and SCE's minimum vertical and radial clearances discussed in the paragraph above when designing the proposed LRT system as these may result in significant safety impacts.

Concerns with Modification and Relocation of High Voltage Transmission Lines
As discussed in our comment letter dated April 14, 2010, SCE is concerned about the significant cost associated with modification and relocation of our existing 200 kV and 500 kV transmission lines, as well as impacts to existing access roads. SCE prefers that our existing transmission lines operate in place instead of relocation.

The Draft EIR/EIS briefly mentions utility relocations; however, it does not discuss the modification or relocation of existing SCE transmission lines and potentially significant environmental impacts related to relocation and modification, which may include aesthetics, biological, cultural, hazardous materials, noise, and water resources. The proposed LRT would increase the ground elevations and may require the modification of our existing transmission lines, which may require increased tower heights and may result in impacts to aesthetics/visual resources and air traffic circulation. [It should be noted that Federal Aviation Administration (FAA) Part 77 requires notification of construction of a structure more than 200 feet above ground level.]

The SR 60 LRT Alternative would cross existing 500 kV transmission lines at least once at Crossing #4 (Paramount Boulevard) and possibly again at Crossing #5 (Peck Road). If the LRT alignment cannot be lowered in these locations, SCE may need to increase the tower heights of the 500 kV transmission lines to accommodate the LRT system. Crossing #4 is already congested with SR 60 and numerous SCE transmission line crossings, which will make accommodation of the LRT system and modification of the transmission line towers difficult. Increasing the 500 kV tower heights would trigger an FAA Aeronautical Study and filing with the FAA. SCE is concerned that the Aeronautical Study may result in a "Determination of Presumed Hazard" and the transmission line tower heights may be restricted. (On another project, FAA issued SCE a "Determination of Presumed Hazard" and required SCE to redesign the 500 kV towers to a lower overall height.) The Draft EIR Section 4.6.3 (Environmental Impacts/Environmental Consequences) does not address the visual impacts associated with the modification or relocation of SCE existing transmission facilities. SCE is concerned that Crossing #4 may result in significant visual impacts.

The Draft EIR/EIS does not specify if specific transmission lines would be placed underground; however page 4.6-14, Mitigation Measure 4.6-xv, discusses placing existing wires underground, where appropriate. Undergrounding existing 66 kV, 200 kV and 500 kV transmission lines may result in significant environmental impacts. If Mitigation Measure 4.6-xv is applied to transmission lines, the Draft EIR/EIS should be revised to discuss potentially significant impacts.

Cumulative Projects--Mesa 500 kV Substation Project
Section 4.19 (Cumulative Impacts) of the Draft EIR should include SCE's proposed Mesa 500 kV Substation Project located in the City of Monterey Park, south of Potrero Grande Drive, west of Greenwood Avenue, east of Markland Drive, and directly north of SR-60. The new 500/220/66/16 kV substation will serve the western Los Angeles Basin. The existing 200/66/16 kV Mesa Substation would expand by approximately 40 acres to accommodate the new 500/220/66/16 kV substation for a total of approximately 67 acres; SCE owns approximately 86 acres of land within the substation area (see enclosed Mesa 500 kV Substation Project map).

The proposed North Side Design Variation is in close proximity to SCE's existing Mesa Substation and has the potential to impact SCE's Mesa 500 kV Substation Project.

CPUC Regulatory Requirements [General Order 131-D]
Please be advised that the construction, modification, and relocation of transmission lines or electrical facilities that are designed to operate at or above 50 kilovolts (kV) may be subject to the CPUC's General Order 131-D[1], which contains rules relating to the planning and construction of electric generation, transmission/power/distribution line facilities and substations. If the construction, modification, or relocation of transmission lines results in significant environmental impacts, they should be identified and discussed in the Final EIR/EIS. If significant impacts resulting from SCE's scope of work are not adequately addressed in the Final EIR/EIS, SCE may be required to pursue a separate, mandatory California Environmental Quality Act (CEQA) review through the CPUC, which could delay approval of the SCE transmission line portion of the project for two years or longer.

Real Properties Review
As discussed above, SCE is concerned that the proposed project may impact SCE's existing 66 kV, 220 kV, and 500 kV transmission lines, as well as the Mesa Substation (existing and proposed 500 kV substation). The proposed LRT should not impose constraints on SCE's ability to access, maintain, and operate its current and future facilities. SCE requests more detailed project information, including location maps, surveyed drawings, elevations and profile details of the proposed LRT alignments alternatives and facilities, including LRT stations, and points of proposed crossings with SCE's existing transmission and distribution lines. Please forward six (6) sets of plans depicting SCE's facilities and associated land rights to the following location:

Real Properties Department
Southern California Edison Company
2131 Walnut Grove Avenue, G.O.3 – Second Floor
Rosemead, CA 91770

SCE will review project plans on a case-by-case basis. Approvals or denials will be in writing based upon review of the maps provided by Metro and compatibility with SCE right-of-way constraints and rights. The impacts will need to be consented to and addressed by SCE prior to finalizing the plan of development.

If you have any questions regarding this letter, please do not hesitate to contact me at marissa.casto@sce.com or (323) 720-5213.

Regards,

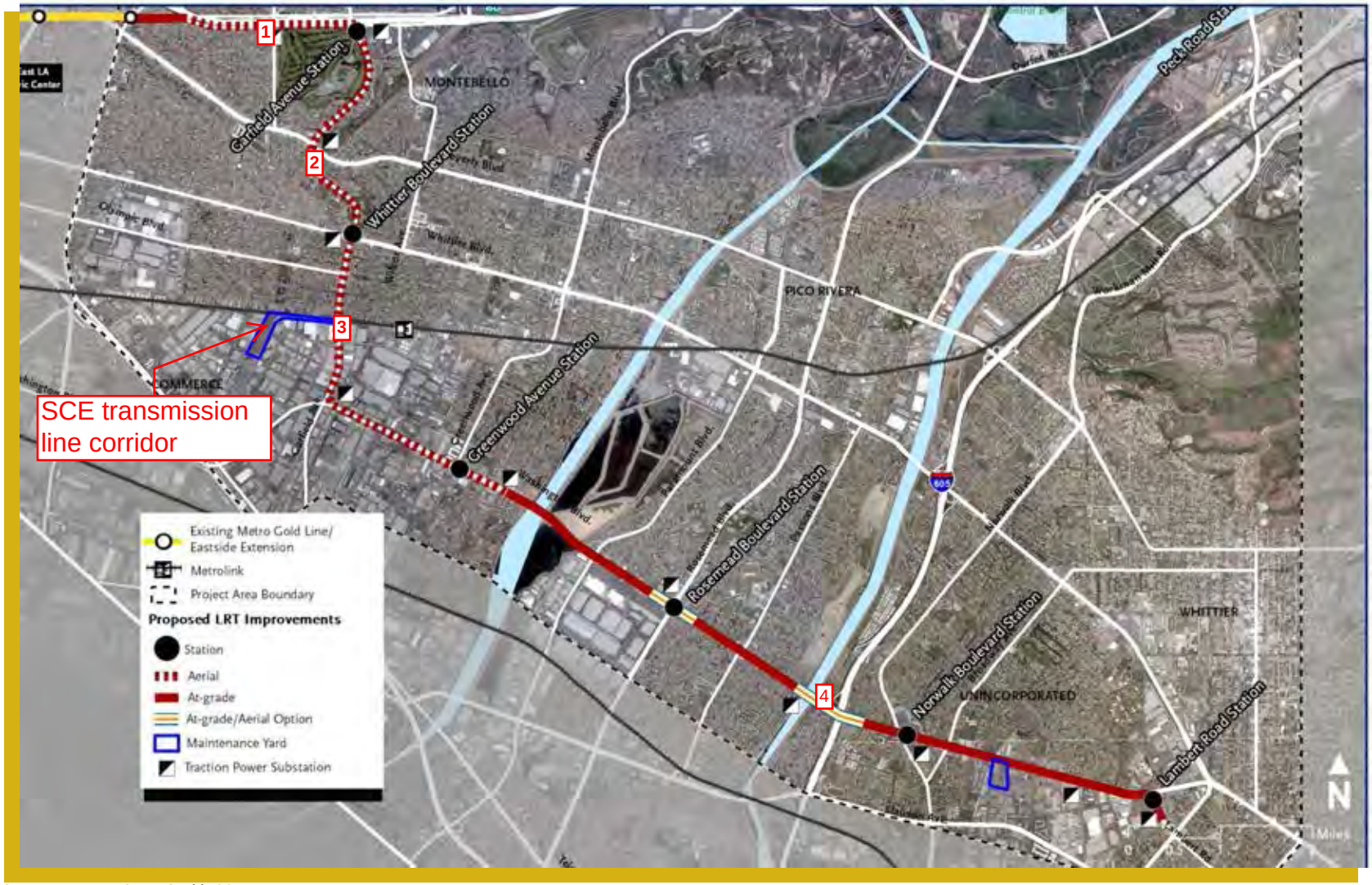
Marissa B. Castro-Salvati

Marissa Castro-Salvati
Local Public Affairs Region Manager
Southern California Edison Company

[1] http://docs.cpuc.ca.gov/PUBLISHED/Graphics/589.PDF

Source: Metro, CDM 2011. Note: Please see Figure 2-3 for TSM enhancements that are also included as part of the SR 60 LRT Alternative (with the exception of the Pomona Freeway Flyer – operator to be determined). The proposed Mission Junction Maintenance Yard is located outside of the view shown in this figure. Please refer to Figure 2-1 for the location of the proposed maintenance facility under the SR 60 LRT Alternative.

Figure 2-4. SR 60 LRT Alternative



Source: Metro; CDM Smith 2011

Note: Please see Figure 2-3 for TSM enhancements that are also included as part of the Washington Boulevard LRT Alternative (see text for exceptions).

Figure 2-8. Washington Boulevard LRT Alternative

Mesa 500kV Substation Project
Substation Project Location

Legend

Substation Project Location

- PRELIMINARY - DRAFT

0 190 380 760 Feet

1 in = 500 feet

Notification #: 202753531
File Name: MLI_Substation_Disturbance_20141016.mxd

Date: 10/16/2014
Version #: 01

Features depicted herein are planning level accuracy, and intended for informational purposes only. Distances and locations may be distorted at this scale. Always consult with the proper legal documents or agencies regarding such features.
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Path: P:\PROJECTS\MPO_Projects\Mesa_500kV_Lucerne\Maps\Project Maps\MLI_Substation_Disturbance_20141016.mxd

STATE OF CALIFORNIA EDMUND G. BROWN JR., *Governor*

PUBLIC UTILITIES COMMISSION
320 WEST 4TH STREET, SUITE 500
LOS ANGELES, CA 90013
(213) 576-7083

October 24, 2014

Ms. Laura Cornejo
Los Angeles County Metropolitan Transportation Authority
One Gateway Plaza, Mail Stop 99-22-2
Los Angeles, CA 90012

SENT VIA EMAIL ON October 24, 2014 TO eastsidephase2@metro.net and all cc's

SUBJECT: SCH# 2010011062; Los Angeles County Metro Eastside Transit Corridor Phase 2 Project - DEIR

Dear Ms. Cornejo:

The California Public Utilities Commission (Commission) has jurisdiction over the safety of highway-rail crossings (crossings) and rail transit projects in California. The California Public Utilities Code requires Commission approval for construction or alteration of crossings and grants the Commission exclusive power on design, alteration, and/or closure of crossings in California. In addition, all rail fixed guideway systems are subject to the Commission's Safety Oversight Program requirements. Safety certification approval is required for rail transit projects to be placed in revenue service. The Commission's Rail Crossings and Engineering Branch (RCEB) will review crossing matters and the Rail Transit Safety Branch (RTSB) will review rail transit project matters. The Commission has received a copy of the Draft *Environmental Impact Statement/Environmental Impact Report (EIS/EIR)* for the proposed Eastside Transit Corridor Phase 2 project. The Los Angeles County Metropolitan Transportation Authority (Metro) is the lead agency.

Metro proposes to implement a light rail transit (LRT) project that would extend the Metro Gold Line Eastside Extension from the existing Atlantic Station to the east by 6.9 to 9.5 miles, depending on the LRT build selected. In addition to the No Build Alternative and the Transportation System Management (TSM) Alternative for comparison purposes, two (2) LRT build alternatives studied in the Draft EIS/EIR are the State Route 60 (SR 60) LRT Alternative, and the Washington Boulevard LRT Alternative.

Both LRT build alternatives would operate a dedicated dual track LRT system with overhead catenary wiring. The proposed LRT system would extend east at-grade along Pomona Boulevard from the existing terminus Atlantic Station, then transition to an aerial configuration running in the south side of SR 60 Freeway right of way (ROW) to the Garfield Avenue Station (located slightly different for each LRT alternative). From the proposed Garfield Avenue Station, two (2) different LRT alternatives are under consideration.

The SR 60 LRT Alternative would then continue the aerial configuration within the southern portion of the SR 60 Freeway ROW, from the Garfield Avenue Station east to the terminus Peck Road Station, for a total of approximately 6.9 miles from the existing terminus Atlantic Station. The SR 60 LRT Alternative would include four (4) aerial and center platform stations, a maintenance yard, and a SR 60 North Side Design Variation due to the former Operating Industries, Inc. (OII) landfill located adjacent to the south side of SR 60. With this variation, the LRT alignment would transition from the south side of SR 60 along the edge of the OII landfill (just west of Greenwood Avenue) to the north side of SR 60 and return to the south side of SR 60 approximately ¼ miles west of Paramount Boulevard. This design variation would include approximately 3,500 feet of at-grade and aerial alignment on the north side of SR 60 and two (2) new bridges to carry the LRT guideway over SR 60 Freeway.

The Washington Boulevard LRT Alternative would then turn south from the Garfield Avenue Station in an aerial configuration above Garfield Avenue, then turn southeast along Washington Boulevard, then transition to a street running configuration within the center of Washington Boulevard from the Montebello Boulevard Station to the terminus Lambert Road Station, for a total of approximately 9.5 miles from the existing terminus Atlantic Station. The Washington Boulevard LRT Alternative would include six (6) stations, a maintenance yard, and two (2) aerial crossing design variations for the Rosemead Boulevard Station section and the San Gabriel River/I-605/Pioneer Boulevard section. Proposed stations would be aerial/center platform, aerial/side platform, or at-grade/center platform type.

The Eastside Transit Corridor Phase 2 project would pass through high density commercial and residential areas of the cities of Commerce, Los Angeles, Montebello, Monterey park, Pico Rivera, Rosemead, Santa Fe Springs, South El Monte, Whittier, and portions of unincorporated Los Angeles County, which include East Los Angeles, west Whittier-Los Nietos. Several new grade-separated or at-grade crossings (highway-rail or rail-rail) would be necessary and should be clearly identified. In addition to noise and vibration concerns, the project will increase traffic volumes not only on streets and intersections, but also at-grade crossings (highway-rail or rail-rail).

The potential impacts should be identified, discussed, and evaluated for necessary safety improvements and mitigations at each proposed crossing and between crossings along street-running portions of the project. This includes considering traffic circulation and queuing, level of service, interconnection of nearby signalized intersections, emergency service response, pedestrian destinations and circulation patterns with respect to the railroad tracks, continuous vandal resistant fencing or other appropriate barriers to limit the access of trespassers onto the railroad right-of-way, noise and vibration concerns, and compliance with the Americans with Disabilities Act. In particular, high population density areas near rail tracks typically lead to a high amount of pedestrians and vehicles around the tracks and may result in pedestrian and vehicle conflicts with LRT trains. Proper analysis and design should minimize such interactions and mitigate the risks associated

with them. Further environmental review should study the possibility of grade separating all of these crossing and mitigating the safety risk of motorists and pedestrian exposure to LRT trains. More discussion on RCEB concerns can be found below.

CPUC Rules and Regulations

The following link provides resources on the Commission's rules and regulations in regard to rail safety: http://www.cpuc.ca.gov/PUC/safety/Rail/.

The Eastside Transit Corridor Phase 2 project is subject to a number of rules and regulations involving the Commission, including:

- California Public Utilities Code, Sections 1201 et al, which requires Commission authority to construct rail crossings;
- Commission's Rules of Practice and Procedure, which details the Formal Application process for construction or modification of a public crossing; and
- Commission's General Order (GO) 88-B, Rules for Altering Public Highway-Rail Crossings.

The design criteria of the Eastside Transit Corridor Phase 2 shall comply with the following GOs:

- GO 26-D, Clearance on Railroads and Street Railroads as to Side and Overhead Structures, Parallel Tracks and Crossings;
- GO 72-B, Construction and Maintenance of Crossings – Standard Types of Pavement Construction at Railroad Grade Crossings;
- GO 75-D, Warning Devices for At-Grade Railroad Crossings;
- GO 95, Rules for Overhead Electrical Construction;
- GO 118, Construction, Reconstruction and Maintenance of Walkways and Control, of Vegetation Adjacent to Railroad Tracks;
- GO 128, Construction or Underground and Electrical Supply and Communication;
- GO 135, Blocking of Crossings;
- GO 143-B, Design, Construction and Operation of Light Rail Transit Systems; and
- GO 164-D, Regulations Governing State Safety Oversight of Rail Fixed Guideway Systems.

State Rules and Regulations

The Eastside Transit Corridor Phase 2 project shall ensure compliance with applicable California Department of Transportation (Caltrans) regulations, including:

- Caltrans' California Manual on Uniform Traffic Control Devices (CA MUTCD) 2012 Edition, parts covering Highway Traffic Signals and Traffic Control for Railroad and Light Rail Transit Grade Crossings;

Federal Rules and Regulations

The Eastside Transit Corridor Phase 2 project shall ensure compliance with federal regulations as well, including:

- Code of Federal Regulations, Title 49, Part 213 (49 CFR Part 213), Track Safety Standards;
- 49 CFR Part 214 Railroad Workplace Safety;
- 49 CFR Part 234, Grade Crossing Signal System;
- 49 CFR Part 236, Rules Standards and Instructions Governing the Installation, Inspection Maintenance, and Repair of Signal and Train Control Systems Devices, and Appliances.

Crossing Authorizations

RCEB staff is available for consultation on crossing safety matters. The following link provides more information on the Commission's RCEB crossing safety, GO 88-B and formal crossing application process: http://www.cpuc.ca.gov/PUC/safety/Rail/Crossings/.

1. Formal Application

   A Formal Application is required for construction of all new crossings (at-grade or grade-separated) along the Eastside Transit Corridor Phase 2 project paths in accordance with the Commission's Rules of Practice and Procedure. When the Eastside Transit Corridor Phase 2 project is clearly defined and prior to submission of a Formal Application, Metro should contact the respective RCEB staff (for Los Angeles County) to arrange a diagnostic meeting with Commission staff and all interested parties to discuss relevant safety issues at each proposed crossing location.

   As part of its mission to reduce hazards associated with at-grade crossings, the Commission's policy is to reduce the number of such crossings. New at-grade crossings would typically not be supported by Commission staff and long-term planning for the grade separation of the proposed at-grade rail crossings should be considered.

2. GO 88-B Requests

   Modification and/or closure of any existing rail crossings are not anticipated. In case proposed as part of the project, they are typically authorized through the Commission's GO 88-B process. If interested parties do not reach agreement regarding proposed modifications, a Formal Application to the Commission will be required in order to obtain authorization to implement the modifications.

Prior to submission of a GO 88-B request for authorization, Metro should arrange a diagnostic meeting with Commission staff and all interested parties to discuss relevant safety issues at each crossing location.

General Safety Concerns

The consideration of an at-grade LTR system within the Eastside Transit Corridor Phase 2 project raises serious rail safety concerns from Commission staff. Commission staff recommends that all proposed crossings of roadways/highways and existing railroad corridors for the Eastside Transit Corridor Phase 2 project be grade separated to prevent vehicle, pedestrian and train vs. train collisions. This is the only way to guarantee no future at-grade crossing accidents along the proposed Eastside Transit Corridor Phase 2 paths.

1. Public pedestrian crossings: Commission staff recommends that new stations provide designated crossing points for pedestrians. These designated crossing points shall be equipped with appropriate levels of pedestrian safety treatments, which may include automatic flashing lights, bells, pedestrian gate arms, and swing gates. Fencing between the tracks is effective in channelizing pedestrians to these crossing locations.

2. Bells and horns: Commission staff recommends analysis of the proposed train horn decibel level to ensure that it can be heard by pedestrians in the expected station environments, which may have stopped rail vehicles, many patrons, railroad train horns, and nearby motor vehicle traffic from roadways and freeways.

3. Fencing: Vandal-resistant fencing and other channelization should be installed to ensure that pedestrians cross only at authorized points along the track. Fencing should be placed to separate the track area from adjacent roadways.

4. Traffic signal preemption: Where an intersection is adjacent (e.g., within 200 feet) to a rail crossing, preemption (at least simultaneous) should be considered to provide time for vehicles and pedestrians to clear the track as a train approaches a crossing. In some cases, this may require significant additional preemption time, advance preemption. In some cases where an intersection is more than 200 feet from the track, it may still need to be reviewed for potential queuing back to the track and thus preemption may still be necessary. Metro should ensure that railroad preemption timing calculation worksheets have been completed and that sufficient track clearance green time is being provided.

5. Pre-signals or queue-cutter signals: To reduce the number of vehicles stopping on the tracks, pre-signals and queue-cutter signals are recommended at some crossings. These traffic signals, in combination with STOP HERE ON RED signs and KEEP CLEAR markings, can provide clear direction that motorists should stop prior to the tracks.

6. Clearances: The project should ensure compliance with applicable minimum clearance requirements as specified in GO 26-D.

Specific Safety Concerns

1. With respect to the two (2) proposed at-grade crossings of Pomona Boulevard/Atlantic Avenue and Pomona Boulevard/Hillview Avenue, which are common to both LRT Alternatives under consideration, Commission staff recommends signalizing and interconnecting the intersections to coordinate LRT movements between them and minimizing impacts negative impacts to vehicle traffic circulation.

2. With respect to the Washington Boulevard LRT Alternative, Commission staff recommends implementation of the two (2) design variations that would grade separate the LRT alignment over Rosemead Boulevard and the I-605 Freeway/Pioneer Boulevard locations. The Traffic Analysis included in your Draft EIS/EIR identified these two (2) locations based on detrimental impacts to intersection Level of Service and efficiency. Studies indicate that secondary effects of such impacts result in increased roadway user frustration and increased risky behavior, which increase the risk of vehicle and pedestrian vs. train collisions.

3. In addition, 16 of 17 intersections on the at-grade street-running portion of the Washington Boulevard LRT Alternative would suffer significant/adverse impacts with no feasible mitigation measures identified due largely to ROW constraints or significant secondary effects to upstream and downstream locations. These 16 intersections would suffer Level of Service ratings of E or F, resulting in unacceptable traffic congestion impacts to surface traffic. It is these types of negative impacts that lead to increased roadway user frustration, risky behavior and risk of train related collisions. Commission staff recommends reevaluating the 16 adversely impacted intersections on the Washington Boulevard LRT Alternative for grade separation.

4. The at-grade crossings at the intersections within the Washington Boulevard LRT Alternative will present problematic interaction between vehicles and LRT trains. Experience has shown that this configuration leads to driver confusion and vehicle-train collisions, especially from vehicles making left turns and U-turns across LRT tracks at roadway intersections. Metro currently struggles with this issue on the street-running portions of its existing Blue Line, Eastside Gold Line Phase 1, and Exposition Line Phase 1.

We appreciate the opportunity to provide comments on the project described in the proposal. We are available to meet and further discuss the comments presented herein with Metro and other relevant parties. We hope to assist in the identification of acceptable mitigation measures that will effectively address the concerns we have identified.

Please feel free to contact Howard Huie at (415) 308-0533 or howard.huie@cpuc.ca.gov regarding rail transit safety matters, or Jose Pereyra at (213) 576-7083 or jose.pereyra@cpuc.ca.gov for rail crossing safety matters.

Sincerely,

Carlo Groag, P.E.
Rail Crossings and Engineering Branch
Safety and Enforcement Division

cc: State Clearinghouse, state.clearinghouse@opr.ca.gov
Roger Clugston, California Public Utilities Commission - ROSB

Coalitions

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October 21, 2014

Client-Matter: 45860-031

VIA E-MAIL

Ms. Laura Çornejo
Director, Countywide Planning
Los Angeles County Metropolitan Transportation Authority
One Gateway Plaza, MS 99-22-2
Los Angeles, CA 90012

Re: Comments on the Draft Environmental Impact Statement/Environmental Impact Report for the Eastside Transit Corridor Phase 2 Project (SCH No. 2010011062)

Dear Ms. Cornejo:

This firm represents the SR-60 Coalition of Cities, consisting of the cities of Monterey Park, Montebello, Rosemead, El Monte, South El Monte, and City of Industry (the "SR-60 Coalition"). On behalf of the SR-60 Coalition, thank you for providing us with the opportunity to comment on the Draft Environmental Impact Statement/Environmental Impact Report ("Draft EIS/EIR") for the Eastside Transit Corridor Phase 2 Project (the "Project"). The proposed Project contemplates the extension of the existing Metro Gold Line Eastside Extension light rail transit ("LRT") system from its current terminus at the Atlantic Station to either (i) Peck Road in the City of South El Monte by way of aerial tracks primarily within California Department of Transportation ("Caltrans") right-of-way along the SR 60 Freeway (the "SR 60 Alternative"), or (ii) Lambert Road in the City of Whittier by way of a combination of at-grade and aerial tracks primarily through Garfield Avenue and Washington Boulevard (the "Washington Boulevard Alternative").

This Project has the potential to transform an entire region, improving traffic congestion, air quality, access to major employment and activity centers, and the overall economic vitality of nearby communities. With that said, however, there are material differences between the SR 60 and Washington Boulevard Alternatives. In the case of the Washington Boulevard Alternative, these differences lead to greater and more intense environmental impacts that negatively affect those living and working in the cities and jurisdictions along the Washington Boulevard Alternative. The Draft EIS/EIR recognizes this, concluding that the SR-60 Alternative is the environmentally superior alternative because it would not cause any unavoidable adverse effects or significant impacts under the National Environmental Policy Act ("NEPA") or California Environmental Quality Act ("CEQA"). By comparison, the Draft EIS/EIR determines that the Washington Boulevard Alternative would worsen traffic, causing unavoidable adverse/significant impacts at ***sixteen*** local intersections, and irretrievably degrade the social and

physical community character as well as visual aesthetics of the residential neighborhoods along Garfield Avenue in Montebello due to the imposing aerial tracks and seven-foot wide concrete support columns that would literally split a community in half and cloak nearby homes, schools, and businesses in darkness during daytime hours.

This is meaningful; however, it does not fully illustrate the clear superiority of the SR 60 Alternative. There are countless additional advantages associated with the SR 60 Alternative that must be understood prior to making a decision on the Project. The Washington Boulevard Alternative also causes numerous additional direct and indirect environmental impacts that are not identified in the Draft EIS/EIR that must be more particularly analyzed and disclosed, including with respect to traffic, safety, noise, aesthetics, air quality, urban decay, historic resources, and loss of privacy.

Nowhere is this more evident than in the City of Montebello. Both the SR 60 and Washington Boulevard Alternatives pass through the City of Montebello's jurisdiction, but it is the Washington Boulevard Alternative that will irretrievably harm the community by erecting social and physical barriers in the middle of residential neighborhoods, degrading aesthetics and community character, demolishing local businesses and homes, and causing numerous significant and unavoidable traffic impacts. For these and other reasons, the City of Montebello and its residents are intensely opposed to the Washington Boulevard Alternative. These deleterious impacts are not just limited to Montebello; they would occur throughout the Washington Boulevard Alternative alignment.

Accordingly, the SR 60 Coalition strongly urges the Los Angeles County Metropolitan Transportation Authority ("Metro") to select the SR 60 Alternative as the Locally Preferred Alternative ("LPA") and recommends that Metro and the Federal Transit Administration approve the Project consistent with the SR 60 Alternative alignment. As described below, the SR 60 Alternative: (1) more fully satisfies the Project's stated purpose and objectives, including increasing access to major employment and activity centers in the area and throughout Los Angeles County, and providing regional transit connectivity with the Metro Gold Line Eastside Extension and Measure R projects; (2) is far superior from an environmental perspective; (3) will take significantly less time and money to construct, (4) is a faster and more direct route to Union Station and the central Los Angeles business district, a major work center, and other major employment and activity centers; (5) provides direct access to the Whittier Narrows Recreation Area, a 1,492-acre regional recreational asset that receives over two million visitors per year; (6) has far greater transit-oriented development ("TOD") growth potential due to the availability of underutilized and vacant land; (7) best meets Metro's stated goals of future eastward expansion to the Inland Empire, Ontario Airport and Palm Springs; and (8) ultimately will result in greater opportunities for increasing ridership.

I. SUPERIOR BENEFITS OF THE SR 60 ALTERNATIVE.

A. The SR 60 Alternative Best Meets the Project's Purpose and Objectives.

The stated purpose of the Project is to "provide area residents, businesses, and transit-dependent populations with a transit alternative connecting them to Metro Gold Line Eastside Extension and the ***regional*** rail system." (Draft EIS/EIR, p. 1-1)(Emphasis added.) The Project is further intended to meet the following objectives:

- Serve the large number of transit-dependent and low-income populations in the project area;
- Increase access to major employment centers, activity centers, and destinations in the project area and Los Angeles County;
- Provide regional transit connectivity with the Metro Gold Line Eastside Extension and Measure R projects; and
- Provide transit alternatives to alleviate roadway congestion, improve mobility options for enhanced quality of life, and provide a convenient and reliable alternative to the automobile. (Draft EIS/EIR, p. 1-2.)

Through a comprehensive analysis of various Project alternatives, the SR 60 Alternative has been found to fully meet all of the Project's objectives while resulting in the fewest environmental impacts. Specifically, through an Alternatives Analysis ("AA") process conducted by Metro, an initial list of 47 conceptual Project alternatives was narrowed down to the two build alternatives considered in the Draft EIS/EIR.[1] In selecting the SR 60 and Washington Boulevard Alternatives as the two most viable build alternatives to analyze in the Draft EIS/EIR, Metro performed a comparative analysis between the two options, with the following notable results: (Draft EIS/EIR Appendix G: AA Report Addendum, pp. ES-13:14.)

- ***Superior*** rankings for the SR 60 Alternative in the areas of Ridership: Access by Park-N-Ride Riders; Capital Cost; Travel Time; Operations & Maintenance Costs; Community and Neighborhood Impacts (Environmental Justice); Air Quality; and Noise and Vibration Sensitive Land Uses.
- Equal ranking between SR 60 and Washington Boulevard Alternatives in the

[1] The Draft EIS/EIR also includes analysis of a No-Build Alternative (i.e., no construction of a new LRT extension would occur) and a Transportation System Management ("TSM") Alternative (i.e., enhancement of both east-west and north-south bus service along the same corridor as the proposed SR 60 and Washington Boulevard Alternatives, but no new LRT construction).

important areas of Ridership: Boardings per Station; Catalyst for Public/Private Economic Revitalization; and Community Support.

And even for several areas that the Washington Boulevard Alternative was initially identified as having an equal ranking during the AA process, subsequent analysis performed as part of the Draft EIS/EIR changed those equivalent rankings, and identified the superior characteristics of the SR 60 Alternative. For example, the AA presumed that the Washington Boulevard Alternative would share the same favorable ranking as the SR 60 Alternative in the area of Visual Compatibility and Aesthetic Impacts; however, the Draft EIS/EIR has concluded that the Washington Boulevard Alternative will result in multiple significant unavoidable aesthetic impacts, therefore preventing it from being considered the environmentally superior alternative.

Furthermore, as analyzed by Metro, both the SR 60 Alternative and the Washington Boulevard Alternative would have a beneficial effect on the Project area by reducing vehicle-miles traveled ("VMT"), vehicle-hours traveled ("VHT"), and the number of peak hour vehicle trips. (Draft EIS/EIR Appendix II: Travel Demand Modeling Technical Memorandum, Table 4.7, p. 32.) However, an important distinguishing characteristic of the SR 60 Alternative is its higher level of user benefits [2] as compared to the Washington Boulevard Alternative. Specifically, despite the fact that Metro estimated the Washington Boulevard Alternative to have slightly higher boarding numbers, the SR 60 Alternative is forecast to have the greatest user benefits of the studied build alternatives, equivalent to 21.9 minutes per project boarding. The user benefits for the Washington Boulevard Alternative are lower, and expected to be approximately 21.3 minutes per project boarding. (Id.) The SR 60 Alternative also outperforms the Washington Boulevard Alternative on a per route mile basis, producing more riders, greater transit performance benefits (including daily linked trips), and greater percentage reductions in VMT and VHT.

The Draft EIS/EIR also concluded that both the SR 60 Alternative and Washington Boulevard Alternative would produce regional benefits through their reductions in peak hour vehicle trips. As discussed in greater detail below, the SR 60 Alternative would have a strategic advantage in effectuating even greater regional transit benefits, as it presents a tangible mass-transit alternative to the regional single-passenger vehicle commuters currently driving the SR 60, which is anticipated to handle increasingly more vehicular traffic between the eastern communities of Los Angeles County and the Los Angeles central business district. The

[2] As defined by Metro, "user benefits" is a system-wide measure of the Project's benefits derived by travelers. "This statistic is expressed as person-hours of equivalent in-vehicle time savings when the project is compared to the TSM alternative. Although the key benefit of a new fixed guideway project is expected to be faster running times (i.e., in-vehicle time), fixed guideway projects may also include improved access, egress, frequencies and costs and all of these elements are embedded in the User Benefit measure." (Draft EIS/EIR Appendix II: Travel Demand Modeling Technical Memorandum, p. 21.)

Washington Boulevard Alternative cannot provide a similar mass-transit alternative to these existing regional commuters, and therefore does not hold the same promise of region-wide transportation benefits.

Finally, and as detailed below, the SR 60 Alternative provides greater benefits to Metro, Project-area residents and businesses, and regional commuters due to its higher safety, greater economic benefits, and more feasible TOD opportunities. In summary, the SR 60 Alternative is superior to the Washington Boulevard Alternative, and should be selected by Metro as the LPA.

B. The SR 60 Does Not Result in Any Significant Environmental Impacts.

The SR 60 Alternative would result in ***no*** unavoidable adverse effects under NEPA, and ***no*** significant impacts after implementation of mitigation measures under CEQA. In contrast, the Washington Boulevard Alternative would produce both unavoidable adverse effects under NEPA ***and*** significant unavoidable impacts, even after mitigation measures, under CEQA in the following environmental impact areas:

- Transportation: The Draft EIS/EIR concludes that 17 intersections along the Washington Boulevard Alternative route would be significantly impacted by operation of the proposed LRT. Furthermore, the impacts at only one of these 17 intersections could be feasibly mitigated, leaving 16 intersections with significant unavoidable impacts.

- Community and Neighborhood: The Washington Boulevard Alternative would adversely alter the social and physical character of the existing community along Garfield Avenue in the City of Montebello between Via Campo and Whittier Boulevard. It would adversely affect the area between Via Campo and Beverly Boulevard due to the removal of community resources (i.e., the Chinese Garden Restaurant, as well as mature trees on the west side of Garfield Avenue) and construction of significant aerial transit infrastructure in close proximity to existing residences along Garfield Avenue. The physical changes to the existing character of this area would remain adverse under NEPA, even after implementation of mitigation measures.

- Visual and Aesthetics: The Washington Boulevard Alternative would substantially change the visual character of Garfield Avenue between Via Campo and Whittier Boulevard and result in both adverse effects under NEPA and significant impacts under CEQA. The aerial guideway and support beams and columns would straddle Garfield Avenue, permanently changing the visual scale and character of the area. The visual alteration of the community along Garfield Avenue, including shading and shadows, would be prominent and would result in an adverse and unavoidable effect

under NEPA and a significant and unavoidable impact under CEQA, even after mitigation.

- Cumulative Impacts: Even with incorporation of mitigation measures, operation of the Washington Boulevard Alternative would result in a considerable contribution to cumulative visual impacts along Garfield Avenue between Via Campo and Whittier Boulevard, as well as cumulative traffic impacts on 16 intersections along the route of the Washington Boulevard alignment.

The contrast between the SR 60 Alternative and the Washington Boulevard Alternative could not be more evident – as the Draft EIS/EIR makes clear, the only build alternative that results in no significant environmental impacts is the SR 60 Alternative, which is why the SR 60 Alternative has been identified as the environmentally superior option.

C. The SR 60 Alternative Provides Greater Economic and Fiscal Benefits.

Unquestionably, the construction and operation of LRT build alternatives tend to generate significant economic benefits, from construction-related economic impacts resulting from the employment of workers to construct the project, to operation-related economic impacts tied to job and housing growth and other investment spurred by a new transit line. Notably, the Draft EIS/EIR concludes that the job and earnings benefits associated with the construction of the SR 60 Alternative would be higher than those same benefits for the Washington Boulevard Alternative. Specifically, the construction of the SR 60 Alternative would result in the creation of 14,540 jobs in Los Angeles County, which is the equivalent of $667.3 million in earnings.[3] These figures apply to impacts that would last for the duration of the project's construction, or four years. (Draft EIS/EIR, p. 4.4-5.)

In contrast, construction of the Washington Boulevard Alternative would result in the creation of fewer jobs (14,320 in Los Angeles County) and lower earnings ($656.8 million), despite the fact that the Washington Boulevard Alternative is several miles longer, includes two additional stations, and would take two additional years to construct. (Draft EIS/EIR, p. 4.4-9.) In fact, the Washington Boulevard Alternative's construction-related economic impacts can only match the SR 60 Alternative's benefits when two major aerial crossings are proposed to be built for the Washington Boulevard Alternative. Even under this scenario, despite the fact that the Washington Boulevard Alternative line is 38 percent longer and has 50 percent more stations, its construction-related economic benefits only exceed the SR 60 Alternative's equivalent benefits by a paltry two percent (and again, these benefits would be spread across a construction period of six years, instead of the four-year construction time period for the SR 60 Alternative). In terms of construction-related economic benefits, the SR 60 Alternative is the superior option.

[3] With the North Side Design Variation, these numbers would be 14,191 jobs and $651.2 million in earnings.

The estimated direct and indirect economic impacts associated with the operations and maintenance spending for the SR 60 Alternative, measured over the life of the Project, are equivalent to 4,498 jobs and $132 million in earnings for Los Angeles County. (Draft EIS/EIR Appendix AA: Economic and Fiscal Impacts Evaluation Technical Memorandum, p. 31.) In comparison, the Washington Boulevard Alternative's operations and maintenance economic impacts (again, measured over the entire life of the Project) are only slightly higher, and equivalent to 4,810 jobs and $141 million in earnings for Los Angeles County. (Id., p. 45.) However, despite this marginally higher operational economic impact over the life of the Project, the Washington Boulevard Alternative fails to realize the annual travel time and cost savings of the SR 60 Alternative. Specifically, the SR 60 Alternative would generate annual time savings for its riders valued at just over $128.9 million, and annual travel cost savings of just under $26.1 million in 2035, compared to the No Build Alternative. (Id., p. 33.) In contrast, the Washington Boulevard Alternative generates both lower time savings ($125.5 million) and lower travel cost savings ($25 million) in 2035 as compared to the No Build Alternative.[4] (Id., p. 46.)

Therefore, whether looking at the beginning of the Project (construction-related economic impacts) or the end of the Project (resulting savings in travel time and costs), the SR 60 Alternative is economically superior to the Washington Boulevard Alternative.

D. The SR 60 Alternative Provides a Superior Option for Travel to the Los Angeles Central Business District.

The Draft EIS/EIR states that in 2006, only approximately 26 percent of transit trips that originated in the Project study area remained in the area. The most popular destination for the remaining ***74 percent*** of transit trips destined outside the Project study area was central Los Angeles (which includes the central business district); such trips accounted for more than 30 percent of transit trips outside the Project study area, producing a major east-west travel pattern that the Project would be able to serve. (Draft EIS/EIR, p. 1-12.)

This major east-to-west travel pattern is facilitated by the SR 60, which accommodates significant automobile and bus commuter traffic, especially in the morning peak commute hours. If built, the SR 60 Alternative would be uniquely well situated to serve these existing travel patterns, and to provide a compelling alternative for commuters, for it provides the shortest and

[4] Please note that these travel time and cost savings numbers are described in the Draft EIS/EIR's Economic and Fiscal Impacts Evaluation Technical Memorandum, and are supported by detailed charts and narrative descriptions of the assumptions and methodologies utilized by Metro. The Draft EIS/EIR, on page 6-9, presents different and slightly higher annual time savings and travel cost savings for the Washington Boulevard Alternative, but provides no explanation of how or why these numbers differ from the Technical Memorandum. As such, the numbers presented in the Technical Memorandum, which demonstrate relatively higher travel time and cost savings numbers for the SR 60 Alternative as compared to the Washington Boulevard Alternative, appear to be more adequately supported by substantial evidence.

most direct route for travelers heading to Central Los Angeles. Specifically, the average peak auto travel time from Peck Road in South El Monte to Union Station in downtown Los Angeles is over 43 minutes, while the peak train travel time on the SR 60 Alternative would be less than 37 minutes. (Draft EIS/EIR, p. 6-9.) This represents a time savings of over ***14 percent***. In contrast, the peak train travel time from Lambert Road in Whittier to Union Station on the Washington Boulevard Alternative is estimated to be 41.5 minutes, or a time savings of ***less than 10 percent*** when compared to the average peak auto travel time of 46 minutes. (Id.)

Moreover, by virtue of the locations of its stations next to the SR 60, the SR 60 Alternative provides a more viable alternative for existing commuters traveling to the central Los Angeles business district to access this shorter and more direct route to their destination. As stated in the Draft EIS/EIR, "[t]he location of the project adjacent to a freeway would promote its visibility to commuters as a viable alternative to solo driving." (Draft EIS/EIR, p. 4.5-16.) In comparison, the Washington Boulevard Alternative does not share this freeway adjacency, and therefore cannot provide the same level of visibility to an existing large population of commuters. Furthermore, the Washington Boulevard Alternative's relatively limited park and ride facilities will not facilitate similar shifts in commuting mode choices (from solo driving to taking the train) as the SR 60 Alternative will. As a result, for solo drivers looking to reduce travel times to downtown Los Angeles and points west, the SR 60 Alternative offers significantly more compelling benefits.

E. The SR 60 Alternative Provides the Greatest Opportunities for Significant Regional Transportation Benefits.

As the government agency responsible for long-range transportation planning efforts pertaining to the SR 60, Caltrans prepared an updated Transportation Concept Report for the SR 60 in June, 2014 (the "TCR").[5] The purpose of the TCR is to evaluate current and projected conditions along the route in question and communicate the vision for the development of each route during a 20-25 year planning horizon. (TCR, p. 1.) The TCR is developed by Caltrans with the goals of increasing safety, improving mobility, providing excellent stewardship, and meeting community and environmental needs along the selected route. (Id.)

The TCR found that the SR 60 is a major east-west state route that traverses Los Angeles County and is used for interstate, interregional and intraregional travel and shipping through an urbanized corridor, serving the four major import-export terminals of Long Beach Municipal Airport, Los Angeles International Airport, and the ports of Long Beach and Los Angeles. In addition, it is used as a commuter route, and provides an important access link to the Los Angeles central business district. (Id., pp. 5 and 8.) Traffic volume is forecasted to increase on

[5] Available at http://www.dot.ca.gov/dist07/divisions/planning/cm/ROUTE60TCRFINAL.pdf, accessed October 13, 2014.

SR-60 in 2035, which will require additional lanes to achieve the acceptable concept level of service. (Id., p. 5.) This finding correlates to the Draft EIS/EIR's projected population and employment growth that will occur in the Project area.

The TCR further found that there are limited alternative transit options for users of the SR 60 – Metrolink only has two stations in the Project area, and bus services are traveling the same congested roadways and freeways as commuters in their personal vehicles. However, as Caltrans recognizes, it is critical that mobility be maintained and improved on the SR 60 in order to sustain the economic growth that is expected in the region. (Id., p. 31.) Due to this anticipated growth, and the limited existing transit options, the TCR specifically identifies the construction of the SR 60 Alternative as part of an overall comprehensive plan to maintain and improve mobility along the SR 60. (Id., p. 30.)

Caltrans also recognizes the importance of TODs along existing key transportation corridors, and the TCR approvingly cites the SR-60 Coalition's TOD report prepared with funding from the Southern California Association of Governments ("SCAG") in 2011 (the "SR 60 TOD Report"). (Id., p. 31.) Specifically, Caltrans recognizes that a mix of residential, employment and shopping opportunities designed for pedestrians, in proximity to a major transit stop, can increase the number of trips made by transit, walking and cycling, thus reducing the number of car trips and improving air quality by reducing exhaust emissions. (Id., p. 32.)

Therefore, as evidenced by the TCR, the SR 60 currently plays a critical role in providing mobility for the region, but is at risk of contributing to decreased mobility due to population and employment growth, as well an anticipated growth in vehicular traffic. Completing the SR 60 Alternative will facilitate Caltrans' efforts to preserve mobility along this route, and will also provide opportunities for future TOD development that will lead to greater shifts from vehicular traffic to LRT ridership.

F. The SR 60 Alternative Provides Greater Opportunities for Increasing Ridership By Expanding Park and Ride Capacity.

The Draft EIS/EIR states that a total of approximately 3,165 off-street parking spaces would be provided at the SR 60 Alternative's four proposed stations. As stated in the Draft EIS/EIR, the parking supply at the proposed park and ride facilities was determined largely by the geometric constraints of the property, and is "conceptual" in nature. (Draft EIS/EIR, p. 3-35.) The Draft EIS/EIR goes on to state that, in the final design phase of the Project, reconfiguration of the parking lots and spaces may be conducted to create more stalls, or additional parking levels may be added to proposed garages. (Id.)

The above language acknowledges that a greater number of spaces could feasibly be added to existing stations. And as the number of available parking spaces at LRT stations is

increased, the number of riders boarding from that station can directly increase as well. This causal connection is demonstrated by Metro's own studies showing that one of the biggest barriers to attracting new riders to LRT trains is not the price of fares or the frequency of service – it's the lack of parking. (*Los Angeles Times*, "Lack of Parking Drives Many Away From Mass Transit," October 21, 2014.)[6] Several studies in other U.S. cities show a direct link between parking availability and ridership numbers, suggesting that full lots discourage some people from riding the train. (Id.) This appears to be borne out in Los Angeles County – for example, in North Hollywood, where the Red Line subway ends, Metro estimates that it loses as many as 1,500 riders a day because the North Hollywood station existing parking lot fills up by 7:30 a.m. (Id.) If parking shortages continue to exist at current and future LRT stations, Metro's goal of shifting hundreds of thousands of additional drivers to public transit could be significantly hindered. (Id.)

Given the connection between parking availability and ridership numbers, the SR 60 Alternative, which is anticipated to carry a high percentage of riders who drive to and park at the proposed stations, is very well positioned to increase ridership through the addition of parking spaces. Moreover, each of the proposed station locations for the SR 60 Alternative offer a wide range of options for adding parking spaces. Most notably, the Santa Anita station is to be located on a very large, vacant 30-acre site, and a significant increase in the Draft EIS/EIR's assumed number of park and ride spaces could feasibly be achieved at this location. In addition, the Peck Road station location, at the terminus of the SR 60 Alternative, also offers numerous opportunities to feasibly add additional park and ride spaces either at the location currently proposed for the station, or immediately adjacent to it. Therefore, through the relatively simple reconfiguration of one or more of the proposed SR 60 Alternative stations to include significantly more parking spaces, additional park and ride users could access the LRT, and the projected ridership numbers for the SR 60 Alternative could easily be increased.

In contrast, the Washington Boulevard Alternative does not offer similar opportunities for increasing ridership through the addition of more park and ride spaces. First, due to space constraints, the Whittier Boulevard station is not proposed to include ***any*** park and ride spaces, indicating that the addition of such spaces in the future will likely be infeasible. Second, at other station locations along the Washington Boulevard Alternative, any proposed park and ride facilities are to be constructed in close proximity to existing residential uses, and expanding the number of spaces proposed by the Draft EIS/EIR presents numerous challenges. Expanding these facilities outwards (i.e., increasing the footprint of the proposed park and ride facilities) will necessitate even more condemnations, on top of what is already proposed for the Washington Boulevard Alternative by the Draft EIS/EIR. And expanding these facilities upwards (i.e., constructing additional levels of parking atop the proposed facilities) will create

[6] Available at http://www.latimes.com/local/california/la-me-california-commute-20141021-story.html, accessed on October 21, 2014.

environmental impacts pertaining to land use, traffic, and aesthetics/shade/shadow impact areas, due to these facilities' close proximity to existing land uses, including sensitive residential receptors.

Therefore, the SR 60 Alternative provides a significant and feasible opportunity to increase its projected ridership through the addition of more park and ride spaces at the stations. The Washington Boulevard Alternative does not enjoy this same opportunity due to the "landlocked" nature of its alignment, as well as the developmental constraints of its particular station locations. As shown by Metro's experiences with its other rail lines, a lack of available parking spaces at stations will discourage riders from taking the train. By increasing the number of parking spaces at the SR 60 Alternative's stations, the projected ridership numbers for the SR 60 Alternative can be increased significantly, thereby increasing the regional transportation benefits of the SR 60 Alternative, including travel time and cost savings and reductions in VMT/VHT. The Washington Boulevard Alternative does not offer these same opportunities to increase ridership, a fact that the Draft EIS/EIR does not sufficiently recognize.

G. The SR 60 Alternative Provides More Opportunities for Increasing Ridership Due to Greater Transit-Oriented Development Opportunities.

The Draft EIS/EIR correctly notes that multiple opportunities exist for future TOD on underutilized or vacant sites in the vicinity of the stations proposed for the SR 60 Alternative. Metro has extensive experience with TOD projects, and has operated a TOD-focused Joint Development Program for many years, which promotes the following goals:

- Encourage comprehensive planning and development around station sites and along transit corridors, and

- Reduce auto use and congestion through encouragement of transit-linked development.

The types of development that Metro seeks for its Joint Development Program are projects that promote and enhance transit ridership, enhance and protect the transportation corridor and its environs, enhance the land use and economic development goals of surrounding communities and conform to local and regional development plans, and generate value to Metro based on a fair market return on public investment. (Draft EIS/EIR Appendix N: Land Use and Development Opportunities Technical Memorandum, p. 42.)

With funding from SCAG, the SR-60 Coalition has taken the initiative to engage in a growth and development visioning exercise regarding potential TOD projects at the station areas for the SR 60 Alternative, and in 2011, prepared the very detailed SR 60 TOD Report. Significantly, the SR 60 TOD Report demonstrates the feasibility of significant TOD

opportunities along the SR 60 Alternative alignment, and demonstrates the strong interest by the SR-60 Coalition's member jurisdictions in bringing these development opportunities into existence. Exhibit A to this letter consists of a chart detailing the type and scale of station-related development that is contemplated along the SR 60 Alternative by the Draft EIS/EIR, the development characteristics of each station site identified by the Draft EIS/EIR, and the feasible TOD opportunities envisioned by the SR-60 Coalition member cities, and detailed in the SR 60 TOD Report.

As Exhibit A makes clear, significant opportunities for TOD projects exist at each of the SR 60 Alternative station locations. Moreover, this chart helps to rebut the Draft EIS/EIR's unsupported claim that "the potential for TOD at the proposed stations along the SR 60 LRT Alternative alignment would be less compared to the Washington Boulevard LRT Alternative alignment, given the number of stations proposed under this alternative compared to the Washington Boulevard LRT Alternative and the development restriction at the Santa Anita Avenue station site." (Id., p. 47.) First, the "development restriction" at the approximately 30-acre Santa Anita Avenue station refers to a United States Army Corps of Engineers flood control easement which encumbers the site. However, this easement does not limit or preclude the type or scale of development other than prohibiting residential uses. Accordingly, the SR 60 TOD Report contemplates significant nonresidential development, as well as a significant park and ride facility, for this large vacant site, which would be consistent with the site's applicable land use controls. Moreover, it is important to recognize that the Washington Boulevard Alternative possesses no equivalent large multi-acre vacant station site that can accommodate a significant TOD project.

Second, aside from the non-issue of the Santa Anita Avenue station flood control easement, the Draft EIS/EIR's conclusion that the Washington Boulevard Alternative possesses greater TOD opportunities appears to be based only on the fact that the Washington Boulevard Alternative has six stations, while the SR 60 Alternative has four stations. This conclusion is not well-reasoned, for it fails to take into account that the SR 60 Alternative's vacant 30-acre Santa Anita Avenue station site has tremendous development potential, which is unmatched by any station site along Washington Boulevard. The Draft EIS/EIR also fails to take into account the more limited TOD opportunities at each of the stations along the Washington Boulevard Alternative. In fact, as confirmed by the Draft EIS/EIR itself, nearly all of the Washington Boulevard stations have greater development constraints when compared to the SR 60 Alternative station sites. (Id., pp. 63-67.) Specifically:

- The Whittier Boulevard station site is so constrained that Metro is required to acquire numerous commercial properties in order to construct the station and required access facilities, and is not even proposing to construct a park and ride facility. The single-family residential zoning to the south of the station acts as a further development constraint.

- The Greenwood Avenue station's most promising sites for redevelopment, located to the north and south of the proposed station, need to be acquired by Metro in order to construct the station itself and its related access facilities. And as the Draft EIS/EIR acknowledges, "[t]he potential for development of land uses in the vicinity of this station would be limited to redevelopment of existing uses," and "improvements to the built environment are needed to create a transit oriented, pedestrian-friendly environment." (Id., pp. 63-66.)

- At the Rosemead Boulevard station site, once again, the most promising sites for redevelopment (again to the north and south of the proposed station) need to be acquired by Metro in order to construct the station itself and related access facilities. Moreover, most of the area adjacent to the station has already been recently redeveloped, thereby discouraging a second round of reinvestment and redevelopment by property owners. (Id., p. 66.)

- At the Norwalk Boulevard station site, only a small degree of development is anticipated for several vacant parcels along Norwalk Boulevard adjacent to the station site and along Broadway north of Washington Boulevard, as well as surface parking lots in the area. (Id., p. 66.)

- The Draft EIS/EIR identifies the Fred C. Nelles California Youth Authority site as a potential development area 0.5 mile to the north of the Lambert Road station site; however, any development of this site would involve obtaining control of the site from the California Department of Corrections, and complying with the development limitations imposed by the site's historical landmark status. Moreover, while this site is identified as being located 0.5 miles away, that distance is measured as the crow flies, and would require cutting through the campus of Presbyterian Intercommunity Hospital. The distance between this potential development site and the Lambert Road station site is closer to one mile via the existing roadways of Washington and Whittier Boulevards. This would represent a significant walking distance away from the station, which can impede the success of a proposed TOD project.

In summary, each of the SR 60 Alternative's station locations appear to present greater and more feasible TOD opportunities than the corresponding Washington Boulevard Alternative station locations. As a result, the Draft EIS/EIR's conclusions regarding the superior development opportunities along the Washington Boulevard Alternative do not seem to be supported by substantial evidence.

H. The SR 60 Alternative Provides Significant, and Possibly Unaccounted-For, Ridership Opportunities To and From One of the Region's Largest Recreational Destinations, as Well as Other Unaccounted-For Recreational Assets.

The SR 60 Alternative alignment travels along, and stops at, the Whittier Narrows Recreation Area ("Recreation Area"), a 1,492-acre park located in the City of South El Monte, which is one of Los Angeles County's largest and most popular recreation areas.[7] The Recreation Area is part of the Whittier Narrows Dam Basin, which is owned by the Federal government and operated and managed by the U.S. Army Corps of Engineers, which leases the Recreation Area to the County. (Visioning Whittier Narrows: Whittier Narrows Dam Basin Recreation Area Master Development Plan Input, October 2010, p. 1.)

The Recreation Area is a unique community asset, which offers a multitude of amenities for visitors, including three lakes with boating and fishing opportunities, golfing, a nature center, multiple sports fields, tennis courts, picnic areas, shooting and archery ranges, walking trails, an equestrian center and equestrian trails, and community gardens. (Id.) In addition, the Recreation Area hosts a number of special events and performances, ranging from carnivals, to spring and autumn fairs, to large outdoor music festivals. Data compiled by the Los Angeles County Department Parks and Recreation show that the number of visits to the Recreation Area has varied between 2.0 and 2.5 million visits per year since 2006, which is equivalent to between approximately 5,500 and 6,800 visitors per day. (Id., pp. 17-18.) Importantly, the County's figures underestimate the actual number of visitors, as they do not include visitors to the Recreation Area's golf course, tennis center, or nature center. (Id.)

However, the Draft EIS/EIR does not discuss these significant visitor numbers in connection with its projected ridership numbers for the SR 60 Alternative. Moreover, the Draft EIS/EIR's ridership projections only used average ***weekday*** ridership estimates, and did not include weekend riders. This decision would likely significantly depress the ridership numbers for the SR 60 Alternative, as most trips to the Recreation Area will be made on weekends, instead of on a weekday. In addition, although it is difficult to determine from a review of the Draft EIS/EIR's travel demand modeling technical memorandum (contained in Appendix II of the Draft EIS/EIR), the Draft EIS/EIR may have used a general annualized region-wide recreational trip-factor to estimate travel demand for the SR 60 Alternative and the Washington Boulevard Alternative, instead of looking at the unique characteristics of the Recreation Area relative to its size, breadth of recreational opportunities, very large number of annual visitors, and immediate adjacency to the SR 60 Alternative's Santa Anita Avenue station. These unique

[7] Los Angeles County Department of Parks and Recreation, http://parks.lacounty.gov/wps/portal/dpr/Parks/Whittier_Narrows_Recreation_Area, accessed on October 13, 2014.

characteristics would drive increased travel demand numbers for the Recreation Area, and increased ridership numbers for the SR 60 Alternative.

In addition to failing to account for the significant visitor traffic to and from the Recreation Area, the Draft EIS/EIR also fails to discuss the visitor traffic to and from other significant recreational assets located along the SR 60 Alternative, including the Montebello Country Club Golf Course and the Pico Rivera Bicentennial Park. Similar to the Recreation Area, these assets draw visitors from across the region, often on weekends, which the Draft EIS/EIR does not capture. Were these recreational assets properly included in the Draft EIS/EIR's travel demand modeling, the projected potential ridership numbers for the SR 60 Alternative would very likely increase significantly. In turn, the SR 60 Alternative's projected performance measures, including VMT/VHT reductions, travel time and cost savings, and user benefits, would increase as well. Omitting consideration of these significant recreational assets as important trip generators results in the Draft EIS/EIR significantly undercounting the SR 60 Alternative's ridership figures.

I. The SR 60 Alternative Provides Superior Access to Recreational Opportunities for Underserved Communities.

As noted above, the SR 60 Alternative would provide significant new transit access to the Recreation Area, a unique 1,500-acre park and recreational asset for the surrounding region. Providing additional public transit connections to the Recreation Area would be a tremendous public benefit, as the cities immediately surrounding the Recreation Area, including South El Monte, Montebello, and Pico Rivera, face challenges in providing adequate park resources for many of their residents. On average, these cities provide 1.5 to 2.5 acres of green space for each 1,000 residents — below Los Angeles County's level of service standards of 4 acres per 1,000 people for local parks and 6 acres per 1,000 for regional parks. (Id., p. 18.) While the facilities at the Recreation Area serve a regional population, they are an equally important component of these local cities' opportunities for both active and low-impact recreation. (Id.) Furthermore, due to its large size, breadth of recreational opportunities, and status as a regional attraction, the Recreation Area accommodates recreational demands that cannot otherwise be accommodated in neighborhood or community parks. (Id., pp. 23-24.) While the SR 60 currently provides direct access to the Recreation Area for automobile drivers and bus riders, providing additional direct transit connections to the Recreation Area could make a significant difference in residents' ability to access and utilize these recreation facilities. (Id., p. 18.) Bringing additional transit connectivity to this important recreational asset would be consistent with the Recreation Area's visioning plan, which advocates for improving community connections to the Recreation Area, adding connections to transit nodes and stops, and completing "missing links" in regional connections where they exist. (Id., pp. 24 and 32.)

Finally, enhancing regional access to significant recreational assets will promote important health-related benefits for the residents of the region, as people living in park-deficient communities will be able to travel to the Recreation Area, or other recreational assets adjacent to the SR 60 Alternative, by train, and then be able to walk, run, golf, play tennis, or participate in a multitude of other fitness options that are unavailable where they reside. Recognizing the importance providing access to recreational opportunities in order to enhance public health, and in order to reduce obesity, the Los Angeles County Department of Public Health recommends increasing public transit options between transit stations and surrounding communities.[8] By providing direct access to the Recreation Area at the Santa Anita Road station, as well as access to other recreational assets at its other station locations, the SR 60 Alternative would directly promote this important health-related goal.

J. The SR 60 Alternative Requires Fewer Expensive and Time-Consuming Property and Right of Way Acquisitions.

The SR 60 Alternative would result in 23 full or partial acquisitions of privately owned property (and 24 acquisitions if the North Side Design Variation was constructed). (Draft EIS/EIR, p. 4.4-6.) The Draft EIS/EIR correctly concludes that the total assessed value of these acquisitions ($9.77 million, in 2010 dollars) does not rise to level of significance, as it is well below the one percent threshold for determining the significance of tax base changes. (Id.) The Draft EIS/EIR also concludes that 69 jobs would be displaced or relocated due to these property acquisitions. (Draft EIS/EIR, p. 4.4-7.)

In contrast, construction of the Washington Boulevard Alternative would result in ***65*** full or partial acquisitions. While the total assessed value of these acquisitions would also likely not rise to the level of significance, the Draft EIS/EIR concludes that an estimated ***633*** jobs would be displaced or relocated due to the property acquisitions needed for the Washington Boulevard Alternative. (Draft EIS/EIR p. 4.4-9:10.) However, the Draft EIS/EIR's conclusion that these job displacement impacts would be less than significant does not appear to be adequately supported. For starters, the Draft EIS/EIR makes the exact same conclusory statement regarding the loss of 69 jobs under the SR 60 Alternative as it does regarding the loss of 633 jobs under the Washington Boulevard Alternative, namely that: "[J]obs could be retained with relocation and reestablished in other available locations in the jurisdiction or the project area [and therefore] there would be no net loss of jobs overall." (Draft EIS/EIR, pp. 4.4-7 and 4.4-10.) This is an entirely unsatisfactory rationale for concluding that these job displacement impacts will not be significant. Fifty-eight of the 65 acquisitions proposed for the Washington Boulevard Alternative (nearly 90 percent) will result in a loss of jobs at businesses such as restaurants,

[8] County of Los Angeles Department of Public Health, "Obesity and Related Mortality in Los Angeles County," September 2011, p. 10. Available at http://publichealth.lacounty.gov/wwwfiles/ph/hae/ha/Obesity_2011Fs.pdf, accessed on October 20, 2014.

medical offices, banks, retail stores, and warehouses. (Draft EIS/EIR Appendix O: Real Estate Acquisition – Displacement and Relocation Technical Memorandum, pp. 32-37.) No job is easy to replace, but these types of service industry jobs are particularly hard to replace in an economy that is struggling to recover.

As opposed to the numerous local businesses impacted by the acquisitions required by the Washington Boulevard Alternative, only eight of the 23 acquisitions proposed for the SR 60 Alternative (or only one-third) will result in a loss of jobs at such similar businesses, and the vast majority of the anticipated acquisitions are of vacant or undeveloped properties, which further limits the number of displaced jobs. (Id., pp. 23-25.) The difference between the two alternatives in relation to their job displacement impacts is real and significant.

The Draft EIS/EIR also unnecessarily restricts its analysis of the economic impacts of these acquisitions to the amount of lost property tax revenue. But there are many other economic impacts that result from partially or fully displacing a small business, such as a loss in sales tax revenues, business license fees, and other such revenues. Moreover, given the high number of acquisitions required for the Washington Boulevard Alternative, there is a very real likelihood of both cost overruns and time delays that often accompany condemnation actions, which will depress the Draft EIS/EIR's estimated benefits of this alternative. Without assessing these additional potential economic impacts, or the high likelihood of the Washington Boulevard Alternative's costs increasing while its benefits decrease due to condemnation-related negotiation and litigation, the Draft EIS/EIR's conclusion that acquisition-related impacts of the Washington Boulevard Alternative are less than significant cannot be supported.

Finally, although the Washington Boulevard Alternative would operate in an aerial configuration above Garfield Avenue and portions of Washington Boulevard, where the tracks will be supported either by columns straddling both sides of the street or by single columns (Id., p. 11.), there is no discussion of potential acquisitions or street/sidewalk widenings required in conjunction with this aerial configuration and the placement of the required infrastructure. As the Draft EIS/EIR notes, "permanent aerial easements are used for the operation of an elevated transit line," (Id., p. 17.), but no such permanent easements are discussed in connection with the Washington Boulevard Alternative. In contrast, the Draft EIS/EIR discusses and specifically identifies the acquisition of easements that will be required to accommodate the aerial configuration of the SR 60 Alternative at certain locations in the City of Montebello. (Id., p. 25.) This omission does not make sense, as the Washington Boulevard Alternative will operate in an aerial configuration for a significant portion of its route, and additional aerial segments (e.g., over the Union Pacific railroad ("UPRR") tracks south of Montebello, possibly over the I-605 freeway, etc.) are considered by the Draft EIS/EIR. The Draft EIS/EIR must identify and analyze all necessary easements, vacations, and/or condemnations that the Washington Boulevard Alternative will require in order to provide assurance that all potential acquisition and dislocation impacts have in fact been identified and analyzed.

K. The SR 60 Alternative Enhances Mobility, Connects Existing Community Resources, and Does Not Create Significant Community Divisions.

As the Draft EIS/EIR notes, the SR 60 Alternative does not produce adverse or significant impacts upon the social or physical character of the project area, nor will it negatively affect the existing character of the neighborhoods where the SR 60 Alternative would be routed. (Draft EIS/EIR p. 4.5-13.) The SR 60 Alternative will also contribute important benefits to existing communities along its alignment by providing enhanced transportation connections to surrounding communities. Key community resources that would benefit from the SR 60 Alternative and its enhanced transit opportunities include East Los Angeles College, the restaurants on Garfield Avenue, the Shops at Montebello, and the Whittier Narrows Recreation Area. (Draft EIS/EIR p. 4.5-15.)

In addition, businesses and residents would find it attractive to relocate to the areas around the SR 60 Alternative stations, as these stations would provide new transit connections to other major destinations served by the Metro system such as LA Live, Grand Avenue, the University of Southern California, the University of California Los Angeles, Culver City, and Los Angeles County museums. (Id.) Importantly, the SR 60 Alternative would not cause any adverse or significant impacts to mobility in existing communities, as its routing would not block any existing crosswalks or signalized intersections, nor would it alter traffic movements within or between communities. (Draft EIS/EIR p. 4.5-16.) The Draft EIS/EIR further finds that the SR 60 Alternative would increase mobility and access for bicyclists and pedestrians within the Eastside and across the region by introducing new light rail service to the project area, and that the location of the project adjacent to a freeway would promote its visibility to commuters as a viable alternative to solo driving. (Id.) Finally, the SR 60 Alternative would provide a new way to traverse the Rio Hondo and Whittier Narrows Recreation Area, both of which currently act as barriers to movement between the surrounding communities. As such, the Draft EIS/EIR concludes that the SR 60 Alternative would reduce the dividing effects of the SR 60 Freeway, the Rio Hondo, and the Whittier Narrows Recreation Area, which would be a beneficial impact. (Draft EIS/EIR, p. 4.5-17.)

In contrast, the Draft EIS/EIR concludes that the Washington Boulevard Alternative will produce adverse and significant impacts upon the social or physical character of the project area, and will alter the existing character of the neighborhoods where the Washington Boulevard Alternative would be routed. Specifically, substantial transportation infrastructure, consisting of new aerial tracks supported by concrete columns and bents spaced between 100 and 200 feet apart, would be constructed through a low-rise residential neighborhood along Garfield Avenue in the City of Montebello. (Draft EIS/EIR, p. 4.5-20.) This new infrastructure would visually separate the landscaped areas on the west side of Garfield Avenue between Via Campo and Beverly Boulevard from the residential structures on the east side. (Draft EIS/EIR, p. 4.5-21.) These aerial structures would also introduce a significant visual barrier to the existing

community. (Draft EIS/EIR, p. 4.5-24.) Furthermore, construction of the Garfield Avenue station would require the removal of multiple street-fronting restaurants along Garfield Avenue that have been identified as valued community resources. Together, the construction of the immense aerial transit infrastructure and the removal of multiple existing buildings would constitute an unavoidable adverse alteration of the physical and social character of the area along Garfield Avenue between Via Campo and Whittier Boulevard. (Draft EIS/EIR p. 4.5-21.) The SR 60 Alternative does not result in any such equivalent adverse impacts, and represents the superior option.

L. The SR 60 Alternative More Closely Aligns with Metro's Goal of Linking Eastern Los Angeles County Residents to Transit.

Metro, as Los Angeles County's transportation agency, is responsible for planning, coordinating, designing, building, and operating transit systems to serve Los Angeles County jurisdictions and residents.[9] Metro's Long Range Transportation Plan ("LRTP"), last adopted in 2009, serves as the primary transportation-planning tool to guide future transportation investments in Los Angeles County through 2040. (LRTP, p. 18.) The LRTP reflects the transportation infrastructure development opportunities created by the passage of Measure R, which imposed a half-cent sales tax increase within Los Angeles County, and which will provide up to $40 billion in new funding for transit projects and improvements. (Id., p. 22.) In short, Metro is tasked with planning for Los Angeles County's transportation needs, and spending the funds committed by Los Angeles County's voters to achieve these plans.

The SR 60 Alternative follows the alignment of the SR 60, which as discussed above, is a critical east-west travel corridor for Los Angeles County and the larger regional transportation network. The proposed terminus of the SR 60 Alternative, at Peck Road, is proximate to the 605 freeway, another critical regional transportation route. The Peck Road station, then, provides significant connectivity to regional travelers along two major Los Angeles County transportation routes. Future extension of the Project from Peck Road to the east would provide even greater ridership opportunities, by connecting to jobs-rich communities such as the City of Industry, and by continuing to provide a viable LRT alternative to solo automobile commuting along the SR 60. Further extension east would also provide the benefits of LRT transit to additional Los Angeles County jurisdictions and residents, and facilitate future connections to other important transit infrastructure such as Ontario Airport.

In contrast, the Washington Boulevard Alternative terminates at Lambert Road, just short of the central business district of Whittier. Further extension along Washington Boulevard into downtown Whittier cannot be easily accomplished, due to the massive dislocation that would be necessary to bring this alignment through an existing built-up commercial downtown area.

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[9] Metro website, http://www.metro.net/about/agency/mission, accessed October 13, 2014.

Furthermore, from Lambert Road, there are fewer equivalent densely populated, jobs-rich Los Angeles County communities for the Washington Boulevard Alternative to connect to in the future. As a result, bringing LRT to Lambert Road would leave Metro with limited options for extending the route to additional Los Angeles County communities, as the greatest ridership potential would require extending the line south into Orange County. And while transit connectivity between Orange and Los Angeles Counties is an important regional goal, Metro, as a Los Angeles County transportation authority, should prioritize the travel needs and demands of Los Angeles County jurisdictions, residents, and employers. The SR 60 Alternative best meets these goals, and provides the greatest opportunities for Metro to further extend LRT to large communities in need of transit alternatives in Los Angeles County.

M. The SR 60 Alternative's Potential Environmental Contamination Issues Have Been Thoroughly Studied and Can Be Fully Avoided or Mitigated, in Contrast to the Washington Boulevard Alternative's Potential Contamination Issues.

A portion of the SR 60 Alternative alignment, immediately to the south of the SR 60 right of way, would pass alongside a former municipal landfill in the City of Monterey Park that is a current Superfund environmental cleanup site. The landfill is protected by a clay cover which is designed to encapsulate the contents of the landfill. According to the Draft EIS/EIR, residual landfill material may be present within the Caltrans ROW on the south side of SR 60; therefore, when constructing the columns for the aerial guideway for the SR 60 Alternative, these columns could encounter this landfill material, and/or the integrity of the clay cover could be compromised. (Draft EIS/EIR Appendix V: Geotechnical/Seismic/Hazardous Materials Technical Memorandum, pp. 49-50.) However, the Draft EIS/EIR concludes that any potential construction-related impacts resulting from such disturbance of landfill materials or the protective cover can be mitigated to a level of insignificance. Furthermore, in the unlikely event that construction of the SR 60 Alternative's columns is deemed to pose greater than anticipated hazards, the Draft EIS/EIR fully analyzes the North Side Design Alternative, which would have the SR 60 Alternative cross to the north side of the SR 60 in order to avoid placing columns in the landfill area. As a result, the Draft EIS/EIR includes substantial evidence demonstrating the potential impacts pertaining to environmental contamination issues for the SR 60 Alternative, and also clearly describes the feasibility of fully mitigating any such impacts.

In contrast, the Washington Boulevard Alternative's entire Lambert Avenue station facility would be placed directly atop another environmental contamination site, resulting in both construction and operational impacts pertaining to contamination issues. Specifically, this portion of the Washington Boulevard Alternative would be constructed at-grade within the Omega Chemical Corporation OU2 groundwater plume, creating the potential for intrusion of vapors from the groundwater plume into at-grade structures. (Id., p. 56.) Therefore, further investigations would be required prior to the construction of any buildings at-grade to determine

if conditions are such that vapor intrusion could occur and create a public health risk. (Id., p. 58.) Based on these investigations, vapor barriers or other design elements would need to be put in place to ensure potential impacts from vapor intrusion would remain less than significant. While the SR 60 Alternative includes two distinct options for eliminating risk from environmental contamination issues, the Washington Boulevard Alternative cannot provide a design alternative to the proposed placement of Lambert station, and it instead requires extensive additional site investigations as well as the incorporation of station design elements (e.g., sensors, blowers, etc.) that are designed to preserve the safety of riders occupying the station facilities. These issues represent an increased level of uncertainty, and a higher level of risk, for the Washington Boulevard Alternative.

N. The SR 60 Alternative is Safer Due to Fewer Potential Conflicts with Pedestrians and Other Vehicles.

More than 94 percent of the SR 60 Alternative would operate in an aerial configuration, primarily within the southern portion of the SR 60 freeway's right-of-way. (Draft EIS/EIR Appendix BB: Safety and Security Technical Memorandum, p. 6.) As a result, with the exception of a very small at-grade portion of track to the east of the existing Atlantic Station, the SR 60 Alternative's alignment would be separated from close proximity with existing pedestrian or local vehicular traffic, allowing for less chance of conflicts between the operation of the LRT and this pedestrian and vehicular traffic.

In contrast, the guideway infrastructure for both the at-grade and aerial portions of the Washington Boulevard Alternative are placed either directly above or down the middle of busy local arterial streets such as Garfield Avenue and Washington Boulevard. (Id., pp. 8-9.) Specifically, for the aerial configuration along Garfield Avenue and portions of Washington Boulevard, the Washington Boulevard Alternative alignment is supported at various locations either by columns straddling both sides of the street or by single columns. Then, at Montebello Boulevard along Washington Boulevard, the alignment transitions to a street running configuration with a dedicated trackway located in the center of Washington Boulevard, and with only signalized intersections allowing for cross traffic. (Id., p. 10.)

Accordingly, the Draft EIS/EIR recognizes that construction activities associated with the SR 60 Alternative, and related potential impacts to pedestrian, bicycle, and motorist safety, would be less than those associated with the Washington Boulevard Alternative. (Id., p. 41.) Moreover, the operation of the SR 60 Alternative would result in lesser impacts to the pedestrian and bicyclist environment, motorist safety, and response times for emergency service responders compared to those associated with operation of the Washington Boulevard Alternative. (Id., p. 43.) These conclusions derive from fact that at-grade LRT operations inherently produce greater impacts in these areas. With regard to pedestrian safety, collisions between pedestrians and trains are often elevated at or near station locations as a result of large numbers of persons that

may be crossing at-grade rail tracks, or running to catch a train at station platforms. (Id., p. 51.) And with regard to motorist safety, the single-most frequent cause for motor vehicle accidents with light rail transit vehicles at intersections is when motorists turn left in front of a train, with the train traveling in the same direction. (Id., p. 53.)

To mitigate potential pedestrian and motorist safety impacts, the Draft EIS/EIR discusses proposed design features and traffic controls along the Washington Boulevard Alternative, including channelization techniques to direct pedestrians to designated crossings, use of active "Train Approaching" signs for motorists, and review of proposed crossing designs by both the California Public Utilities Commission ("CPUC") and local agencies. (Id., pp. 51-54.) However, the effectiveness of these controls will have to be assessed in light of the significant and unavoidable traffic impacts that will be created by the Washington Boulevard Alignment. Specifically, at each location where the proposed pedestrian and motorist controls will be implemented, traffic will already be incredibly backed up, with long delays for vehicles attempting to make left turns, and for pedestrians attempting to cross streets to catch a bus or train. These significant delays – at sixteen affected intersections – greatly increase the possibility of drivers and/or pedestrians attempting to beat the light, or beat the train, in order to either get through the intersection, or make it to the station. The results, unfortunately, are likely to lead to accidents and injuries along the Washington Boulevard Alternative.

Although the Draft EIS/EIR examines to a certain degree the possibility of motorist conflicts and accidents along the at-grade portions of the Washington Boulevard Alternative, these potential conflicts would also exist along the aerial portions of this alignment. Both Garfield Avenue and Washington Boulevard are significant truck routes, providing access to and from the SR 60, as well as the I-5 and I-605 freeways for a significant number of trucks traveling between the ports of Los Angeles and Long Beach, the multiple truck terminals located in Montebello and Commerce, and inland logistics facilities that are accessed via the I-605 freeway. With this heavy truck traffic comes increased chances for traffic accidents along both Garfield Avenue and Washington Boulevard. If a truck were to crash into one of the over eighty columns lining both sides of Garfield Avenue, it could seriously impair the structural integrity of the LRT guideway. Similarly, along Washington Boulevard, the roadway medians that have been used for years by trucks to make turns into and out of industrial sites and terminal facilities will now be occupied by pylons supporting the aerial guideway. In addition to impairing these trucks' turning ability, the placement of the aerial guideway above the median of Washington Boulevard gives rise to a significant possibility of trucks crashing into the required supporting pylons, thereby causing significant damage to the LRT infrastructure.

II. THE EASTSIDE TRANSIT CORRIDOR PHASE 2 DRAFT EIS/EIR

The SR 60 and Washington Boulevard Alternatives are materially different from each other with respect to their environmental surroundings, proposed design, anticipated construction

schedule, and operational requirements and activities. The following is a representative list of significant differences that result in environmental impacts along the Washington Boulevard Alternative.

- **The Washington Boulevard Alternative Reduces Critical Roadway Capacity and Includes At-Grade Crossings Along An Already Congested Major Arterial Street.** The Washington Boulevard Alternative will eliminate a traffic lane on both Garfield Avenue and Washington Boulevard, which already experience unacceptable levels of congestion, and introduce ten at-grade crossings along Washington Boulevard, creating significant and unavoidable traffic impacts at sixteen local intersections that were studied. Given that only intersections directly on the Washington Boulevard Alternative alignment were studied, it is likely that additional intersections and street segments will also be impacted, further exacerbating traffic gridlock in the project area. The SR 60 Alternative, by comparison, will not reduce roadway capacity, does not include any at-grade crossings (with the exception of two that are shared with the Washington Boulevard Alternative near the Atlantic station), and does not cause any significant and unavoidable traffic impacts.

- **The Washington Boulevard Alternative's At-Grade Crossings Increase the Risk of Serious Accidents and Fatalities.** The Washington Boulevard Alternative would include twelve at-grade crossings, including ten such crossings on Washington Boulevard. By comparison, the SR 60 Alternative does not have any at-grade crossings (with the exception of two that are shared with the Washington Boulevard Alternative near the Atlantic station). Minimizing the number of at-grade crossings is critical, as at-grade crossings are inherently dangerous, resulting in numerous car and pedestrian accidents every year in California, some of which are fatal. Recognizing this, the Draft EIS/EIR concluded that "[o]peration of the Washington Boulevard Alternative would result in relatively greater impacts to the pedestrian and bicycle environment, motorist safety, and emergency response times for emergency service compared to those associated with the operation of the SR 60 LRT Alternative. This is predominantly due to the presence of a substantial portion of the Washington Boulevard LRT Alternative alignment being at-grade for the latter third of the alignment." (Draft EIS/EIR Appendix BB: Safety and Security Technical Memorandum, p. 50.)

- **The Washington Boulevard Alternative is Proposed Along a Major East/West Freight Truck Corridor that is Wholly Incompatible with Light Rail Use.** Washington Boulevard is one of the most congested corridors in the region, due in part to high volumes of freight truck traffic from the BNSF Railway intermodal facility, numerous distribution centers and warehouses located along Washington Boulevard, and its direct access to the I-605 and other major arterial streets. Notably,

between Downey Road and I-710, Washington Boulevard runs along the large BNSF intermodal facility in the City of Commerce. Further east, around the I-710, there are a series of distribution centers located one block south of Washington Boulevard. Washington Boulevard then connects with I-5 before passing through another stretch of industrial operations. Between Paramount and Rosemead Boulevards, Washington passes a large shopping center, behind which are a number of distribution centers and industrial operations. For the remainder of the corridor, Washington Boulevard passes through residential neighborhoods; however, trucks continue to travel this route to access the I-605. The Draft EIS/EIR fails to adequately describe the extent of the freight truck corridor, but one only needs to drive along Washington Boulevard to understand that these trucks are massive and they are everywhere.

Adding a pedestrian-oriented light rail line to an already congested freight truck corridor that will further deteriorate with additional project traffic and at-grade crossings is a serious safety hazard. This may also lead to a change in truck traffic patterns to avoid the light rail line that will create new traffic, noise, safety and other impacts along other streets in the area. Given the above, the light rail line most certainly will significantly interrupt and have a negative economic impact on the regional goods movement that is so critical to Southern California's economy. The SR 60 Alternative is a better option because it would be developed as an aerial structure along the SR 60 within Caltrans right of way, with no possibility for traffic, pedestrian or freight truck conflicts.

- **The Washington Boulevard Alternative Has A Significantly Greater Number of Sensitive Receptors Which Are Located Much Closer to Construction Activities and Operations.** According to the Draft EIS/EIR, there are over 2,100 sensitive receptors within the area of impact of the Washington Boulevard Alternative, the closest of which are mere footsteps away from a line that will be under construction for six years and then operating continuously seven days a week, from 4 a.m. to 1:30 a.m. The majority of these sensitive receptors are located in residential neighborhoods that will literally be divided in two should the Washington Boulevard Alternative be built. For example, in the City of Montebello along Garfield Avenue, the proposed aerial rail line will pass right in front of second-story bedroom windows at residences and classroom windows at the Cantwell-Sacred Heart of Mary High School. Noise, shade/shadows, loss of privacy, and physical and social separation and interruption are just a few of the resulting consequences.

  In contrast, the SR 60 Alternative will be constructed primarily within Caltrans right-of-way immediately adjacent to the SR 60 freeway. Light rail operations would be entirely consistent with the existing transportation-related character of the SR 60, and there are significantly fewer sensitive receptors in the vicinity of the SR 60

Alternative that are, on the whole, located much farther away from the right of way. The Draft EIS/EIR recognizes this, noting that "[t]he land uses [along the Washington Boulevard line] become increasingly residential and commercial farther east along the corridor, in the cities of Montebello, Pico Rivera, Santa Fe Springs, and Whittier," whereas the SR 60 Alternative is "a freeway corridor with limited adjacent residential land uses. The corridor is largely defined by large-scale commercial development projects and recreation centers near the freeway." (Draft EIS/EIR Appendix EE: Construction Impacts Technical Memorandum, p. 48.)

- **The Washington Boulevard Alternative's Aerial Tracks and Concrete Support Columns on Garfield Avenue Will Split Communities in Half, Forever Disrupt Community Cohesion, and Create Permanent Shade/Shadow and Other Impacts On/Around Sensitive Receptors.** The Washington Boulevard Alternative would require the construction of an elevated aerial guideway, supported by over eighty bents and columns straddling a major thoroughfare passing through a low-rise residential neighborhood. Because of this, it would create significant and unavoidable changes in the existing visual character of Garfield Avenue in Montebello, including significant and unavoidable shade and shadow impacts. The SR 60 Alternative, on the other hand, is located within Caltrans right of way along the SR 60 freeway. It is substantially removed from most sensitive receptors and would not otherwise cause any of these impacts. In fact, the Draft EIS/EIR concluded with respect to the SR 60 Alternative that it would actually improve the dividing effects of the SR 60 Freeway, Rio Hondo, and Whittier Narrows Recreation Area, stating that "[t]he SR 60 LRT Alternative would retain existing freeway crossings and pedestrian crosswalks. Some freeway crosswalks and freeway crossing areas would be enhanced through station area urban design. The new light rail service would also provide a new way to traverse the Rio Hondo and Whittier Narrows Recreation Area, both of which act as barriers to movement between the surrounding communities. As such, the SR 60 LRT Alternative would reduce the dividing effects of the SR 60 Freeway, the Rio Hondo, and the Whittier Narrows Recreation Area. This would be a beneficial impact." (Draft EIS/EIR, p. 4.5-18.)

- **The Washington Boulevard Alternative Will Acquire and Demolish Significantly More Buildings, Including Existing Homes and Business.** The Washington Boulevard Alternative requires the acquisition of 65 parcels. A total of 58 businesses and approximately 633 employees would be displaced, as well as nine residences and the 30 people who live there. And although the Draft EIS/EIR is unclear on this point, it appears that this alternative would demolish at least 49 existing buildings. The SR 60 Alternative, on the other hand requires the acquisition of only 23 parcels, consisting of eight businesses (69 employees) and zero residences. This is a considerable difference. The Washington Boulevard Alternative would lead to

greater economic impacts and the potential for urban decay due to lost businesses and jobs, substantial reduction in local property and sales tax revenue, and overall economic slowdown during the six-year construction period. Moreover, the significantly greater amount of demolition activities will create, among other things, higher construction noise levels and hazardous air emissions.

- **The Washington Boulevard Alternative Will Be Under Construction for Six Years.** The Draft EIS/EIR describes that construction of the Washington Boulevard LRT Alternative will last for approximately six years due to its additional length and substantial on-street construction activities. The construction includes significantly more parcel acquisitions via eminent domain, building demolition, street reconstruction, utility relocation and other street work as compared to the SR 60 Alternative. By comparison, the SR 60 Alternative would take an entire two years less to construct, minimizing economic interruption and environmental effects.

While the Draft EIS/EIR identifies some impacts caused by the Washington Boulevard Alternative, there are other areas which require additional analysis and disclosure in order to fully satisfy CEQA's informational mandates.[10] The importance of fully disclosing the potential for environmental impacts cannot be overstated. "An EIR is an 'environmental "alarm bell" whose purpose is to alert the public and its responsible officials to environmental changes before they have reached ecological points of no return.' [Citations.] The EIR is also intended "to demonstrate to an apprehensive citizenry that the agency has, in fact, analyzed and considered the ecological implications of its action.' [Citations.] Because the EIR must be certified or rejected by public officials, it is a document of accountability.'" (*San Joaquin Raptor/Wildlife Rescue Center v. County of Stanislaus* (1994) 27 Cal.App.4th 713, 721.)

A. The Draft EIS/EIR Fails to Adequately Evaluate and Disclose Critical Construction and Operational Transportation Impacts Caused By the Washington Boulevard Alternative.

The Draft EIS/EIR describes that operation of the Washington Boulevard Alternative will create adverse/significant and unavoidable project-specific and cumulative impacts at ***sixteen*** local intersections along Washington Boulevard. In fact, the Washington Boulevard Alternative is anticipated to create more local traffic problems than it would actually remedy. (Draft EIS/EIR, p. 3-49 [Washington Boulevard Alternative would improve the level of service ("LOS") at only one intersection when compared to the no-build alternative].) By comparison,

[10] A Draft EIR must identify and disclose reasonably foreseeable significant direct and indirect physical changes in the environment which may be caused by the Project. (CEQA Guidelines §§ 15126(a), 15126.2(a), 15064(d).) A discussion of impacts is only acceptable if it provides "sufficient information and analysis to allow the public to discern the basis for the agency's impact findings." (*California for Alternatives to Toxics v. Department of Food and Agriculture* (2005) 136 Cal.App.4th 1, 13.)

the SR 60 Alternative would not create a single significant and unavoidable traffic impact and would actually further improve the LOS at two intersections. (Draft EIS/EIR, p. 3-33.)

The majority of Washington Boulevard already operates at a deficient LOS along the Washington Boulevard Alternative. (See Draft EIS/EIR Appendix GG: Sunnyvale Analysis [describing, for example, that Garfield/Washington, Paramount/Washington, Rosemead/ Washington all operate at LOS E or F under existing 2010 Conditions].) The Washington Boulevard Alternative would further exacerbate these conditions by adding project traffic, eliminating a traffic lane on both Garfield Avenue and Washington Boulevard, adding ten at-grade crossings delaying north- and south-bound traffic across Washington Boulevard, and restricting left turns from and onto Washington Boulevard and Garfield Avenue.

The combined impact of adding project traffic onto already deficient roadways that have reduced capacity and at-grade crossings results in unavoidable impacts at sixteen intersections studied under the Washington Boulevard Alternative. This alone makes the SR 60 Alternative a superior option from a transportation impact and safety perspective. However, the Washington Boulevard Alternative causes other transportation impacts that should be further evaluated and considered, as described below.

1. <u>The Draft EIS/EIR Fails to Evaluate Potentially Significant Traffic Impacts at Major Arterial Street Segments and Intersections In Close Proximity to the Washington Boulevard Alternative, Near Proposed Transit Stations and Park and Ride Facilities.</u>

The Draft EIS/EIR unduly limits its analysis to intersections directly on the Washington Boulevard Alternative along Garfield Avenue, Washington Boulevard and Lambert Road. It inexplicably fails to study major arterial streets and intersections within close proximity to the Washington Boulevard Alternative that feed into the proposed transit stations and park and ride facilities, or that are otherwise near the sixteen unavoidably impacted intersections. This critical oversight results in a failure to disclose the full extent of traffic impacts caused by the Washington Boulevard Alternative.

In particular, the Draft EIS/EIR should analyze busy street segments and intersections north and south of the line that feed into the proposed stations and parking facilities, where traffic will be highly concentrated. For example, the intersection of East Washington Boulevard (west of Garfield Avenue) and Garfield Avenue (south of Washington Boulevard) draws traffic directly from the I-5 that feeds into the proposed Whittier station. The Draft EIS/EIR determined that this intersection (i) operates at a deficient LOS F under existing 2010 conditions without the project; and (ii) will be significant and unavoidably impacted by the Washington Boulevard Alternative in year 2035. Given the close proximity, it is likely that street segments south of the intersection also will be impacted by traffic from the Washington Boulevard Alternative. This

should be analyzed and disclosed. Greenwood Avenue is similar, as it draws traffic from the I-5 and feeds directly into the proposed Greenwood Avenue station and park and ride facility. Lastly, major arterial intersections such as Slauson at Rosemead, Slauson at Paramount, Slauson at Norwalk, Santa Fe Springs at Lambert, and Broadway at Norwalk were not analyzed but can be expected to experience significant project traffic. Most of these street segments/intersections experience substantial existing traffic and feed directly into the intersections that the traffic study has determined will be significantly impacted by the Washington Boulevard Alternative. Thus, not only will project traffic likely create addition traffic impacts, but the spillover effects from the sixteen significant and unavoidably impacted intersections likely will further exacerbate these conditions.

The same reasoning also applies to nearby busy street segments and intersections north of the Washington Boulevard Alternative, that are not only impacted by project traffic and the spillover effects from impacted intersections along the line, but also experience significant additional delays caused by trains on the UPRR tracks which currently block traffic when traveling at-grade across Vail, Maple, and Greenwood Avenues, as well as Montebello Boulevard. It is simply unreasonable to assume that traffic impacts occur only along the line itself; additional intersections must be studied to determine the full extent of the traffic impacts.

2. The Draft EIS/EIR Fails to Evaluate the Potential for Additional and More Severe Traffic Impacts Caused By the Washington Boulevard Alternative's Restriction on Left-Hand Turns from and onto Garfield Avenue and Washington Boulevard.

The traffic study did not meaningfully assess the likely impacts that would result from prohibiting (1) mid-block left-hand turns from Garfield Avenue and Washington Boulevard; and (2) left-hand turns from Garfield Avenue and Washington Boulevard and from the side streets to Garfield Avenue and Washington Boulevard when trains are approaching the intersection from either direction. This has a number of implications that must be analyzed and disclosed.

During peak operations, trains cross each street segment every five minutes, and with two sets of tracks this presumably would equate to every 2 1/2 minutes as trains are unlikely to pass each other at exactly the same time. That means just about every 2 1/2 minutes all cars and trucks at a particular at-grade intersection on Washington Boulevard will be prohibited from making left hand turns. This delay would be in addition to typical traffic signal delays. More than likely, these additional delays will cause trucks and cars to queue beyond the capacity of the left turn pockets and into oncoming traffic on Washington Boulevard. A single tractor trailer that is prohibited from making a left hand turn may take up an entire pocket by itself or even spill out into oncoming traffic. The Draft EIS/EIR must analyze the very real potential that the prohibition of left hand turns will create significant queuing impacts on Washington Boulevard,

especially in light of the heavy truck traffic in the area that will regularly be making left hand turns to access area warehouses and distribution centers.

Should these delays prove substantial, they likely will compel cars and trucks to reroute around Washington Boulevard and instead use other nearby arterials and local residential streets. For example, a semi-truck traveling westbound on Washington Boulevard would no longer be able to easily access the Menasha Packaging Plant at 8110 Sorenson Avenue in Santa Fe Springs by taking a left turn on Sorenson Avenue. Instead, they may attempt to avoid this segment of Washington Boulevard altogether by taking Slauson Avenue to the south, which was not studied in the Draft EIS/EIR. Trucks attempting to access the large distribution facilities just off of Washington Boulevard, behind Walmart, on Paramount and Rosemead Boulevards, will engage in similar cut-through patterns to access their centers, by either taking Slauson Avenue to the south or potentially Whittier Boulevard to the north, and then cutting down Rosemead or Paramount Boulevards, both of which are primarily residential in character. Rio Vista Elementary School and Ruben Salazar High School are located on Rosemead Boulevard and Plaza de la Raza Child Development Service is located on Paramount Boulevard along these potential cut-through routes. This pattern of cutting through neighborhoods to ultimately arrive at a particular destination would be repeated for a number of locations throughout the Washington Boulevard Alternative, resulting in longer traffic trips, and additional safety concerns and noise impacts at nearby schools and homes.

3. The Draft EIS/EIR Fails to Evaluate the Consequences of Traffic Delays Caused by the At-Grade Crossings on Intersections and Roadway Segments Near Washington Boulevard and Garfield Avenue.

The Draft EIS/EIR fails to account for traffic delays and impacts north and south of the Washington Boulevard Alternative from motorists waiting for trains to cross a given intersection at grade level and for crossing gates to rise, particularly with trains crossing each street segment every five minutes during peak periods. (With two sets of tracks, this presumably would equate to every 2 1/2 minutes during peak periods as trains are unlikely to pass each other at exactly the same time.) The impact of these delays, in combination with the significant and unavoidably impacted intersections throughout the Washington Boulevard Alternative, must be assessed and disclosed. This includes any potential for back-ups and delays impacting other nearby roads and intersections. Again, it is simply unreasonable to assume that traffic impacts occur only along the line itself given the identified significant and unavoidable impacts; additional intersections must be studied to determine the full extent of the traffic impacts.

4. The Draft EIS/EIR Unduly Limits its Analysis of Freeway Impacts to Two Off-Ramps on the SR-60 Freeway.

The Draft EIS/EIR limits its analysis of freeway impacts to just two offramps on the SR 60 at Atlantic Boulevard. In order for this to be supportable, please substantiate that: (1) drivers to the Washington Boulevard Alternative would not access the project from either the I-5 or I-605; and (2) that drivers would not use a different exit off the I-60, further east of Atlantic Boulevard to access the Washington Boulevard Alternative. For example, I-605 exits directly onto Washington Boulevard near both Norwalk and Rosemead stations. Moreover, while we believe it is unlikely that drivers on the SR 60 would ever use the Washington Boulevard Alternative, to the extent that the Draft EIS/EIR model makes such assumptions, it is unclear why project traffic would access the Washington Boulevard Alternative by way of the Atlantic Boulevard exit. Instead, they would simply use the existing Atlantic station.

5. The Draft EIS/EIR Fails to Analyze the Potential for Cut-Through Traffic on Residential Streets.

Given the sixteen significant and unavoidably impacted intersections and the very real possibility that additional nearby roadway segments and intersections are also significantly impacted, the Draft EIS/EIR must analyze the potential for neighborhood intrusion impacts, including whether project traffic would cut through local residential streets to access park and ride facilities. For example, Miller Grove Drive behind Pioneer High School, and in the middle of a residential neighborhood, will be one of the most efficient ways of accessing the Norwalk station from Slauson Avenue, a busy arterial street. Several other likely cut-through routes have not been identified and necessitate further study. Moreover, as explained above, the inclusion of at-grade crossings and prohibition of left-hand turns also will force more cars and semi-trucks onto local roadways near homes and other sensitive uses.

6. The Draft EIS/EIR Fails to Analyze the Washington Boulevard Alternative's Impacts on the Surrounding Community Arising From the Lack of a Park and Ride Facility at the Whittier Boulevard Station.

The Draft EIS/EIR states that the Whittier station will not have a park and ride facility due to space constraints, but claims that this will not create significant parking impacts because (i) drivers will use other stations with park and ride facilities, and (ii) "[a]ny unmet parking demand would need to find available on-street parking in the surrounding neighborhoods, which currently has some availability." (Draft EIS-EIR, p. 3-54.) We submit that this is wishful thinking without any real support. Transit riders will drive to the Whittier station and park on nearby residential streets precisely because they can avoid park and ride traffic – the path of least resistance. It is simply not credible to assume that drivers will not park near the Whittier station and board the light rail. Moreover, on-street parking in the surrounding neighborhoods should be

prioritized for local residents and businesses, not transit users who will create additional neighborhood intrusion and operational transportation impacts, as described below.

Here, it is clear that the failure to provide any parking at the Whittier Boulevard station could create a parking shortage. This station is anticipated to have 2,068 total daily station boardings, 1,490 of which would be during peak hours. (Draft EIS/EIR Appendix II: Travel Demand Modeling, p. 25.) However, parking in the area would be extremely limited because: (i) construction of the Whittier station would require the removal of approximately 75 existing off-street parking spaces in the immediate area, and (ii) on-street parking near the proposed station is prohibited on Washington Boulevard and very limited on Lambert Road. This immediate parking shortage therefore must be satisfied in the dense residential neighborhoods that are located within a short walk of the station.

Although project parking deficits in and of themselves arguably may not be a CEQA issue, secondary impacts which could result from such shortages are impacts requiring CEQA analysis. And "regardless of whether parking is considered a primary or secondary impact of a project, a project's impact on parking generally should be studied for any potential impact on the environment." (See *Taxpayers For Accountable School Bond Spending v. San Diego Unified School Dist.* (2013) 215 Cal.App.4th 1013, 1052.) Accordingly, the Draft EIS/EIR should more fully analyze the availability of parking in the area to determine whether there will in fact be a parking shortage. To the extent there is a parking deficit, the environmental impacts foreseeably resulting from such a parking deficit should be analyzed and mitigated. For example, the Draft EIS/EIR should analyze whether a parking shortage would: (1) result in illegal parking that would impair visibility on narrow streets and from cross streets, blocking driveways, crosswalks, and access to fire hydrants; (2) result in spillover parking and traffic into the nearby residential neighborhoods, creating hazards, causing traffic congestion and noise impacts, and preventing parking for area residents; and/or (3) displace customer parking for local businesses creating economic hardships. Importantly, the trickle-down impacts from the residents and local businesses lacking parking will create traffic congestion and noise impacts on area streets. Moreover, parking controls, like load zones, time limits, and restricted parking zones should be required as mitigation to help keep parking available for local residents, customers, and service providers rather than "hide-and-ride" transit users.

7. <u>The Draft EIS/EIR Fails to Impose All Feasible Mitigation for the Project's Significant and Unavoidable Traffic Impacts.</u>

The Draft EIS/EIR determined that the Washington Boulevard Alternative would adversely and significantly impact seventeen intersections. (Draft EIS/EIR, p. 3-49.) It: (i) describes "potential improvements" that were applied to the impacted intersections, consisting of optimization of signal splits and manually altered green times, increasing cycle length, updated signal phasing, and lane configuration changes including restriping; (ii) concludes that, after

implementation of this mitigation, there would be adverse/significant and unavoidable impacts at sixteen of the seventeen intersections; and (iii) sets forth Mitigation Measure 3.0-xviii, which requires that the intersection of Montebello Boulevard and Washington Boulevard optimize signal splits and provide additional green time. (Id., pp. 3-60-61.) The Draft EIS/EIR, however, fails to require feasible mitigation for the other sixteen significantly impacted intersections, notwithstanding that it appears to assume such mitigation will be implemented. (Id., Table 3-5, pp. 3-16-17.)

CEQA requires implementation of all feasible mitigation to reduce or avoid significant impacts. (Pub. Res. Code § 21100(b)(3).) The Draft EIS/EIR cannot satisfy its CEQA obligations simply by considering the traffic impacts of the Washington Boulevard Alternative, it must go further. The California Supreme Court has emphasized that CEQA contains a substantive mandate that public agencies not approve a project with significant environmental impacts if "there are feasible alternatives or mitigation measures" that can substantially lessen or avoid those effects. (*Mountain Lion Foundation v. Fish & Game Commission* (1997) 16 Cal.4th 105, 119, 134.) At a minimum, optimization of signal splits, increasing cycle length, updated signal phasing and lane configuration changes must also be required for each of the other impacted intersections.

Moreover, the Draft EIS/EIR fails to substantiate why additional capacity-increasing mitigation such as lane configuration changes or restrictions in allowable turning movements are not feasible. It simply states without further explanation that they "were considered infeasible due to ROW constraints or secondary effects to upstream and downstream locations." (Draft EIS/EIR, p. 3-61; Appendix M: Transportation Impacts Technical Memorandum, p. 187.) A description that amounts to nothing more than "take our word for it" does not constitute substantial evidence, given the significant and unavoidable impacts at sixteen intersections along the Washington Boulevard Alternative. "Feasible" means capable of being accomplished in a successful manner within a reasonable period of time, taking into account economic, environmental, legal, social, and technological factors. (CEQA Guidelines § 15364.) We submit that more information is required to substantiate the infeasibility of this additional mitigation. Thus, for each significant and unavoidably impacted intersection, please describe whether and to what extent necessary right of way constraints and/or the "secondary effects to upstream and downstream locations" preclude implementation.

8. <u>The Draft EIS/EIR Fails to Consider Pedestrian Safety and Circulation Impacts Caused By the Reduction or Removal of Sidewalks to Accommodate Over 80 Concrete Support Columns Straddling Garfield Avenue.</u>

The Washington Boulevard Alternative will require the construction of over eighty concrete columns straddling both sides of Garfield Avenue in the City of Montebello. According

to the Draft EIS/EIR, these columns will measure at least seven feet in diameter and will be constructed on sidewalks on both sides of the street. Thus, they have the potential to substantially impair pedestrian circulation and safety, as well as ADA accessibility. However, the Draft EIS/EIR makes no attempt to analyze whether adequate sidewalk width is even feasible at this location given the size and number of these large concrete columns. Moreover, can bike lanes feasibly be installed along this segment given the size, number and placement of the concrete columns? Lastly, will these large columns substantially impair pedestrian circulation along Garfield Avenue, including endangering the safety and welfare of students walking to, for example, the Cantwell-Sacred Heart of Mary High School or Miraculous Medal School for class? Please fully analyze the pedestrian circulation, accessibility, and safety impacts of placing these large support columns on public sidewalks.

9. The Draft EIS/EIR Fails to Substantiate Whether the Washington Boulevard Alternative Would Satisfy CPUC Requirements for Light Rail Transit.

The Draft EIS/EIR describes that all grade crossings are required to be designed in consultation with the CPUC. (Draft EIS/EIR, p. 3-50.) The Draft EIS/EIR's Safety and Security Technical Memorandum provides a cursory overview of some of CPUC's requirements for light rail transit, including right of way standards, operational requirements like braking, lighting and operating speeds, and requirements for grade crossings. (Draft EIS/EIR Appendix BB: Safety and Security Technical Memorandum, p. 14.) However, the Draft EIS/EIR fails to substantiate whether the Washington Boulevard Alternative can feasibly meet such requirements. Does the Washington Boulevard Alternative as currently designed comply with such CPUC requirements? And if not, what design specifications and other operating assumptions must be changed and how does that impact the environmental analysis?

10. The Draft EIS/EIR Determination that Construction Traffic Impacts Are Less Than Significant is Not Supported by Substantial Evidence.

Notwithstanding the numerous local intersections and street segments that will be severely constrained and/or closed during the prolonged six-year construction period, the Draft EIS/EIR summarily concludes that the Washington Boulevard Alternative's traffic impacts during construction would be less than significant because (i) they are temporary, and (ii) they will be mitigated by a traffic management plan. This poses a number of problems including but not limited to the following:

- Neither the Draft EIS/EIR nor its Transportation Impacts Technical Memorandum (Draft EIS/EIR Appendix M) implement a measurable threshold of significance against which to determine whether area traffic will be significantly impacted during the prolonged construction period. Because of this, it is entirely impossible to

determine whether there are any significant traffic impacts during the six year construction period. In light of the identified sixteen significant and unavoidable intersection impacts during operation, it is patently unreasonable to assume that the prolonged construction activities which close and/or severely constrain project street segments and intersections (some of the very same intersections which are significantly and unavoidably impacted during operations), eliminate traffic lanes, redirect traffic, and add construction traffic including large trucks hauling equipment would not result in similar or more intense traffic impacts at those same intersections. Importantly, the construction contemplated for the Washington Boulevard Alternative is not "temporary," as it will be pervasive and ongoing for six years. Area traffic will continue to use Garfield Avenue and Washington Boulevard on a daily basis during this period, and the resulting impacts should be disclosed.

- The Draft EIS/EIR does not assign traffic trips from construction workers to the street system to determine whether construction traffic when added to existing traffic conditions would exceed LOS thresholds, creating significant impacts.

- The contemplated construction management plan mitigation is impermissibly vague and defers mitigation by leaving determinations on "detour routes," necessary "restriping of roadways" (where feasible), "remov[ing] on-street parking" (where feasible), "minimize construction activity during weekday AM and PM peak hours," and other important aspects of mitigation to an undetermined future point in time. As such, there is no way to determine whether traffic impacts will actually be mitigated and to what degree.

11. <u>The Construction Mitigation Measures Required are Inappropriate and Ineffectual to Mitigate the Washington Boulevard Alternative's Construction Traffic Impacts</u>.

The Draft EIS/EIR applies the same construction mitigation measures for both the SR 60 and Washington Boulevard Alternatives. This is inappropriate. For example, Mitigation Measure 3.0-ii describes that the traffic plan should "schedule a majority of construction-related travel (i.e., deliveries, hauling, and worker trips) during the off-peak hours, and that "construction activities would be minimized during weekday AM and PM peak hours (typically 7:00 AM to 9:00 AM and 4:00 to 6:00 PM)." Given that the Washington Boulevard Alternative involves considerably more sensitive receptors that are much closer to the right of way where construction will occur, the mitigation required must be more specific and protective of the general public. At a minimum, mitigation pertaining to the Washington Boulevard Alternative should: (1) detail the length of time construction vehicles can idle and that noise blankets should be required to muffle equipment nose; (2) limit construction activities to daytime hours from 8:00 AM to 6:00 PM, Monday through Friday due to the anticipated long duration of

construction activities (six years); and (3) ensure hauling does not occur during school arrival and dismissal times when children are walking to and from school.

12. The Draft EIS/EIR Defers Analysis and Mitigation of Parking Impacts Caused by the Removal of Parking Spaces to Accommodate Construction Staging, Construction of Stations and Parking Facilities, and Traffic Flow During Construction.

Thousands of on- and off-street parking spaces will be lost during construction of the Washington Boulevard Alternative. For example, the Draft EIS/EIR describes: (1) "At the proposed Lambert Road station and park and ride facility, approximately 510 [off street] spaces would be removed at the southwest corner of the Lambert Road/Washington Boulevard intersection. These spaces serve multiple businesses, and adequate replacement parking would ***not*** be provided" ; and (2) "[O]ne portion of Garfield Avenue from Via Paseo to Via Acosta has high on-street parking occupancy with limited side street parking replacement options. Since the parking displacement would be temporary, parking would be available to the north and south of the segment during construction, and Metro would implement measures to minimize the impact of the displacements, this would not be considered an adverse effect." (Draft EIS/EIR, p. 3-46-47.) Pertaining to the off-street parking removed at Lambert Road and Washington Boulevard, the Draft EIS/EIR makes no attempt to determine where people using these 510 spaces could park. Regarding the on-street parking on Garfield Avenue, the Draft EIS/EIR makes only a superficial and unsupported statement that replacement parking on north and south of the segment would be available. (Draft EIS/EIR, p. 3-46-47; Draft EIS/EIR Appendix M: Transportation Impacts Technical Memorandum, p. 144.) Where? How far away? Does this displace other residential and business parking? Meanwhile, the residents and businesses that use this off- and on-street parking would remain, and their parking will be displaced. This will also create additional traffic attributed to those looking for parking spaces. And while a parking mitigation plan may mitigate the impact if there were in fact substitute parking spaces available for these particular areas, the Draft EIS/EIR makes no attempt to substantiate that there are such spaces. In fact, it indicates just the opposite.

B. The Draft EIS/EIR Must Perform a More Comprehensive Safety Analysis of Impacts on Pedestrians, School Children and Emergency Providers From At-Grade Crossings and Incompatible Heavy Truck Traffic.

The Washington Boulevard Alternative will include twelve at-grade crossings, including two segments along Washington Boulevard each consisting of four crossings in rapid succession at (1) Paramount Boulevard, Crossway Drive, Rosemead Boulevard, and Passons Boulevard, and (2) after the San Gabriel River, at Pioneer Boulevard, Norwalk Boulevard, Broadway Avenue and Sorenson Avenue. At-grade crossings increase traffic chokepoints and collisions at crossings, increase vehicle emissions and train noise, and interfere with goods movement in

Southern California, the nation's leading trade gateway. The Draft EIS/EIR recognizes the safety implications of at-grade crossings, describing that "[o]peration of the Washington Boulevard LRT Alternative would result in relatively greater impacts to the pedestrian and bicycle environment, motorist safety, and emergency response times for emergency service compared to those associated with operation of the SR 60 LRT Alternative. This is predominately due to the presence of a substantial portion of the Washington Boulevard LRT Alternative alignment being at-grade for the latter third of the alignment." (Draft EIS/EIR Appendix BB: Safety and Security Technical Memorandum, p. 50; Draft EIS/EIR, p. 4.16-2.)[11] However, the Draft EIS/EIR falls short in fully disclosing to the public the very real danger in at-grade crossings, and it omits a hazards safety analysis of locating a pedestrian-oriented light rail use along a major truck corridor that has significant and unavoidable traffic impacts. These impacts must be more closely examined.

1. The Draft EIS/EIR Should More Fully Disclose State Policies and Regulations Acknowledging Safety Hazards and Discouraging the Proliferation of At-Grade Crossings.

California regulations and policies recognize the safety hazards associated with running a train at-grade through an urban area, and encourage grade separation. The Draft EIS/EIR should disclose this so that the public fully appreciates the safety implications of the Washington Boulevard Alternative. For example, the Southern California Regional Rail Authority (commonly referred to as SCRRA or Metrolink) has passed Resolutions 91-3 and 98-21 pertaining to the establishment of new highway-rail grade crossings on the Metrolink system. SCRRA policy, in concert with state and national policies, strongly discourages the construction of new highway-rail grade crossings and seeks to reduce the number of active highway-rail grade crossing by promoting grade separation or closure of existing highway-rail grade crossings. In accordance with Resolution 98-21, a new, additional highway-rail grade crossing is not allowed unless the member agency of SCRRA sponsors the request to construct it and the Board approves the request. This resolution also requires the member agency to sponsor the closure of existing highway-rail grade crossing(s) in order to open a new highway-rail grade crossing, so there will be no net increase in the number of highway-rail grade crossings on SCRRA's commuter rail system. (Metrolink SCRRA Highway-Rail Grade Crossings: Recommended Design Practices and Standards Manual, June 30, 2009.)[12] Similarly, CEQA encourages the elimination of existing railroad grade crossings and reconstruction of grade separations to provide greater public safety. (See Pub. Res. Code § 21080.13 ["This division shall not apply to any railroad grade separation project which eliminates an existing grade crossing or which

[11] Note that the Draft EIS/EIR text modifies this statement without any additional evidence to support such modification. (See Draft EIS/EIR, p. 4.16-10.)

[12] Available at www.metrolinktrains.com/pdfs/EngineeringConstruction/Grade_Cross_Stand_Guidelines_Manual_Jun29 _09.pdf, accessed on October 13, 2014.

reconstructs an existing grade separation"].) The CPUC has its own policies regarding grade-separated crossings. The "CPUC Railroad Safety Action Plan" addresses prevention by increased state safety oversight. Finally, California Streets and Highways Code Section 190 Grade Separation Program requires California to specifically fund out of its annual budget projects to grade separate or alter existing public at-grade crossings. This program was enacted to retroactively repair at-grade crossings to address public safety issues, providing approximately $15 million each year. These and other regulations and policies clearly illustrate that grade crossings are dangerous and are strongly discouraged.

2. The Draft EIS/EIR Fails to Evaluate Traffic and Pedestrian Safety Hazards Associated with Heavy Truck Traffic on Garfield Avenue and Washington Boulevard.

The Draft EIS/EIR purports to consider the CEQA Guidelines Appendix G thresholds in assessing the Project's traffic impacts, including whether the Washington Boulevard Alternative would "substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)." (Draft EIS/EIR, p. 3-2.) Unfortunately, however, it does not conduct the requisite safety assessment with regard to introducing an incompatible light rail use designed to encourage pedestrian walkability and transit ridership onto a major east-west freight corridor comprised of heavy truck traffic.

The Draft EIS/EIR describes that arterial streets near the Washington Boulevard Alternative experience heavy truck traffic. (See e.g., Draft EIS/EIR, pp. ES-3, 1-5.) Major truck routes around the Washington Boulevard Alternative include Washington Boulevard, Garfield Avenue, Atlantic Boulevard, Paramount Boulevard, and Passons Boulevard. (Draft EIS/EIR Appendix M: Transportation Impacts Technical Memorandum, pp. 58-59.) These trucks use these arterials to access local warehouses and businesses on and in close proximity to Washington Boulevard, and also because Washington Boulevard serves as a major east/west travel route for trucks driving to/from the BNSF intermodal facility to Interstates 10, 710, 5 and 605. One only needs to drive the corridor to understand that these trucks are everywhere and they are huge. The incompatibility of this use and potential for serious accidents is further compromised by the identified significant and unavoidably impacted intersections, at-grade crossings, and the contemplated restriction of left-hand turns from and onto Washington Boulevard incentivizing trucks to cut through other local streets. The must be closely examined.

These pedestrian and light rail safety hazards will also significantly impair goods movement through this corridor. The Draft EIS/EIR must analyze the economic and transportation implications of interfering with this industry, which is so critical to local and state economies.

The Draft EIS/EIR also must analyze the potential for northbound and southbound traffic either traveling across or turning onto Washington Boulevard and queuing on the track. This is a very real possibility given the significant and unavoidably impacted intersections and heavy truck traffic. To the extent queue cutter signals are proposed, please evaluate whether or not they would cause negative impacts upstream or downstream from nearby signalized intersections. Queue cutter signals can adversely impact operations at nearby adjacent signals due to short signal spacing. Motor vehicle traffic could extend upstream of the tracks into adjacent signalized intersections, creating additional intersection gridlock.

3. There is a Significant Safety Risk to Children Attending Nearby Schools that the Draft EIS/EIR Fails to Disclose or Address.

The pedestrian safety analysis comprises a single page in the Draft EIS/EIR and a technical report in the appendices. Both documents identify local schools in the area near at-grade crossings including Rio Vista Elementary School, El Rancho High School, Rivera Elementary School and Middle School, Pioneer High School, Ada Nelson Elementary School, Brethren Christian Private School, and Washington Elementary. Other schools not identified include Plaza de la Raza Child Development Services, Reuben Salazar Continuation School, George Washington Elementary School, and Plaza de la Raza Head Start. The majority of these schools are within a block or two of the Washington Boulevard Alternative right of way. The Draft EIS/EIR also describes that many children walk to and from these schools. At-grade crossings in the immediate vicinity of these schools pose a significant safety hazard, particularly with respect to young school children. The Draft EIS/EIR fails to evaluate the potential for accidents involving school children walking to school at each of these sites, instead blindly relying on general mitigation measures from the SR 60 Alternative that have very little if anything to do with mitigating the risk of at-grade crossings. In particular, none of the operational mitigation measures specifically address school children nor require that crossing barriers and fences be installed along the at-grade portions of the Washington Boulevard Alternative to protect them from accidents. Draft EIS/EIR Mitigation Measure 4.16-xxiv generally describes that "the diverse needs of different types of travelers, including students, senior citizens, disabled citizens, and low-income citizens would be addressed through a formal educational and outreach campaign." But what does this mean? It certainly doesn't require protective barriers or fencing. And how effective would this be in protecting school children? Further, application of mitigation does not substitute for conducting the requisite analysis and providing that information to the public, which was not done here.

4. The Draft EIS/EIR Fails to Adequately Analyze the Washington Boulevard Alternative's Impact on Emergency Providers, Including Response Times and the Need for New or Expanded Facilities.

Despite acknowledging significant and unavoidable impacts at sixteen intersections, the proliferation of at-grade crossings, the existence of heavy truck traffic, and the elimination of a traffic lanes on Washington Boulevard and Garfield Avenue, the Draft EIS/EIR fails to conduct any meaningful assessment as to whether such conditions will impact emergency responders and facilities. We submit that this is critical information which must be disclosed. Will the existence of these factors significantly delay emergency response times? Will responders be overly taxed with new safety incidents or otherwise delayed in responding due to project traffic conditions such that new or expanded facilities located closer to the LRT will be required?

The lack of analysis and disclosure is particularly egregious in light of the fact that Presbyterian Intercommunity Hospital is located near the terminus of the Washington Boulevard Alternative at Washington Boulevard and Lambert Road. Emergency responders must access Presbyterian's emergency room facilities from the Washington Boulevard and Lambert Road intersection, negotiating identified significant and unavoidable impacts along Washington Boulevard and any trickle-down impacts at other nearby streets. Notably, the Draft EIS/EIR discloses that the Washington Boulevard and Lambert Road intersection will be at deficient LOS F even without the project in during the PM peak hour. Moreover, in concluding that the Washington Boulevard Alternative would not significantly impact emergency services, the Draft EIS/EIR relies on general mitigation measures that do not directly addresses the above-described issue. Again, these traffic impacts will significantly impair the provision of emergency services; the Draft EIS/EIR must disclose how and to what degree.

C. The Draft EIS/EIR Fails to Adequately Evaluate and Disclose Critical Construction and Operational Noise Impacts Caused By the Washington Boulevard Alternative.

The Draft EIS/EIR describes that there are over 2,100 sensitive receptors along the Washington Boulevard Alternative, consisting of homes, schools, churches and hospitals. A number of these sensitive receptors are historic, such as the Cantwell-Sacred Heart of Mary High School where second story classroom windows will be located immediately adjacent to the proposed aerial LRT tracks along Garfield Avenue. The SR 60 Alternative has less than half the number of sensitive receptors (less than 900), and they are generally located farther away from the noise source than as compared to the Washington Boulevard Alternative. Construction activities also will be more intense under the Washington Boulevard Alternative, lasting six years as compared to four years under the SR 60 Alternative. The differences between the two alternatives translate into higher noise levels impacting more people on the Washington Boulevard Alternative. In fact, the Washington Boulevard Alternative's noise level will exceed

the FTA's moderate noise impact criteria at 135 residences and one school along the at-grade sections of the track, a far greater number than under the SR 60 Alternative.

As such, it is critically important that these numerous sensitive receptors along the Washington Boulevard Alternative fully understand the noise levels to which they will be subjected for a prolonged period of time and whether those levels will significantly and adversely impact their daily lives. Unfortunately, however, the Draft EIS/EIR stops short of providing the information necessary for the general public to understand the true impact of a six-year construction period and extensive and ongoing operations near sensitive residences and schools. In the case of the Washington Boulevard Alternative, these omissions are meaningful.

1. The Draft EIS/EIR Noise Analysis Omits Meaningful Consideration of Critical Sensitive Receptors That Are Not Adequately Represented by the 11 Monitoring Sites Selected for the Washington Boulevard Alternative.

The Draft EIS/EIR measured baseline noise levels at eleven monitoring sites purportedly representative of the over 2,100 sensitive receptors along the Washington Boulevard Alternative that may be impacted by the project. (Draft EIS/EIR, p. 4.9-4.) However, this list is far too truncated. There are a number of sensitive receptors that are not adequately represented by the monitoring sites because they may experience significantly different and/or more intense noise impacts due to particular site characteristics, distance from noise generators, and other factors. Moreover, these sites will be subjected to multiple project noise sources that must be fully accounted for. CEQA Guidelines Appendix G noise threshold (c) requires one to determine whether the project would result in "a substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project." Without an actual baseline noise level and a corresponding analysis of the *combined* project noise at these important sensitive receptors, this threshold cannot be meaningfully satisfied.

- **Residences on Lambert Road**

The Draft EIS/EIR does not include a single monitoring site on Lambert Road near the location of the proposed Lambert station and park and ride facility. This area is presently congested with traffic from the Home Depot shopping center and Presbyterian Intercommunity Hospital, and has nearby homes within feet of the Washington Boulevard Alternative right of way. The single family homes located on the east side of Lambert Road generally between Washington Boulevard and Hydro Drive will receive the full brunt of combined project noise from increased traffic, the Lambert station, the 1,020 space park and ride facility, idling feeder buses at the station, and two track switches. Similarly, the homes on Pennant Place also will be severely impacted by the aforementioned noise sources. Currently, these homes are shielded from traffic and other noise on Lambert Road by three commercial warehouse structures fronting Lambert Road. However, those structures will be demolished to accommodate the Lambert

station and park and ride facility, removing this important noise buffer. Existing traffic noise by itself, without the noise buffer, may significantly impact these homes. The addition of combined project noise will only intensify the impact. And given that the LRT will operate throughout most of the night, both daytime and nighttime noise must be fully analyzed.

- **Cantwell-Sacred Heart of Mary School and Nearby Homes**

The Draft EIS/EIR fails to include a noise monitoring site at the historic Cantwell-Sacred Heart of Mary School or analyze the particularities of project noise at this specific sensitive receptor. This school has classrooms located at approximately Garfield Avenue and Madison Avenue, mere feet from the proposed Washington Boulevard Alternative right of way and aerial track. In fact, the second story classroom windows will be at approximately the same height as, and looking directly at, the aerial track. Tracks that are elevated on an aerial structure will typically produce noise levels that are four decibels higher than tracks at grade. This increase in noise level is due to the radiation of the aerial structure as well as more efficient sound propagation from a source that is at a higher elevation. (Create Railroad Noise Model User Guide, Harris, Miller, Miller & Hanson, Inc. (2006), p. 5.)[13] Moreover, project plans indicate that multiple noise-causing track switches will be located on the elevated tracks near the second story classroom windows and that wheel squeal could result from the tight radius turn on the track at this location. Finally, the school is located less than one block away from the Whittier station, and will be subject to kiss and ride traffic, traffic from those parking in the neighborhood and riding transit, feeder buses, and other general station noise.

These factors will also severely impact the residences in the same general location on the opposite side of Washington Boulevard. These residences have second-story bedroom windows that will directly face the aerial tracks. Moreover, most of these residences do not have central air and will be sleeping at night with their windows open.

- **Residences on Pico Vista Road, Near Washington Boulevard**

These residents living on Pico Vista Road, adjacent to the San Gabriel Coastal Basin, currently enjoy a relatively quiet environment. They are removed from Washington Boulevard by a large setback area and their backyards front the San Gabriel River. For these reasons, this location is considerably different than the other "representative" monitoring sites. Moreover, they will be subjected to significantly more intense and different project noise. For one, the Washington Boulevard Alternative proposes to demolish the corner house at 7004 Pico Vista Road that is the closest to Washington Boulevard and replace it with a noise generating traction power substation. The demolition of this house not only introduces a new noise source for the

[13] Available from U.S. Department of Transportation Federal Railroad Administration website, https://www.fra.dot.gov/eLib/details/L03728#p1_z5_gD_lRE_y2006, accessed on October 13, 2014.

remaining nearby homes in the form of a substation, but also removes the noise barrier shielding the home at 7010 Pico Vista from traffic (and future light rail) noise on Washington Boulevard. Lastly, the aerial crossing option would further increase noise levels received by these sensitive receptors as compared to at-grade tracks.

- **Mexican American Opportunity Foundation Child Care Center.**

The Draft EIS/EIR does not discuss or analyze the licensed daycare facility at the Mexican American Opportunity Foundation Child Care Center located on 401 N. Garfield Avenue. Young children are particularly susceptible to noise impacts. The noise from the aerial crossing (including the potential for wheel squeal as described below), without any intervening noise buffers, must be analyzed.

2. The Draft EIS/EIR Fails to Account for the Cumulative Effect of Noise on Nearby Homes and Schools.

The cumulative noise impacts of train whistles, horns and crossing bells in such close proximity to sensitive receptors, with train frequencies as often as every 2 1/2 minutes will severely impact residences and schools along the Washington Boulevard Alternative. For example, the single family homes located on the east side of Lambert Road generally between Washington Boulevard and Hydro Drive will receive the full force of combined project noise from increased traffic, the Lambert station, the 1,020 space park and ride facility, idling feeder buses at the station, two track switches, as well as existing noise from the Home Depot shopping center and Presbyterian Intercommunity Hospital. There will only be short period of time during the daytime and evening hours seven days a week when crossing bells, train whistles and horns will not be heard ringing for the adjacent homes that lie within feet of all of these noise sources, thus permanently eliminating all quiet time and affecting residents' ability to sleep.

And it's not just bells, whistles and traffic noise; the Draft EIS/EIR failed to account for the *combined* noise impact of any operational noise sources, such as from LRT vehicles generally, special track work, traction power substations, park and ride facilities, and maintenance yards. The Draft EIS/EIR should describe which sensitive receptors would receive noise from more than one of these noise sources and quantify the *combined* noise levels to determine the cumulative impact. Consideration of each noise source, by itself in a vacuum, without considering their combined effect on sensitive receptors violates CEQA.

3. The Draft EIS/EIR Fails to Account for Critical Project Details that Will Lead to Higher Noise Levels at Sensitive Receptors Near the Washington Boulevard Alternative.

- **Potential for Wheel Squeal.**

The Noise and Vibration Technical Memorandum describes that wheel squeal will not occur because the curves along the track "are expected to be longer than 65 feet (the distance associated with the onset of wheel squeal)." (Draft EIS/EIR Appendix T: Noise and Vibration Technical Memorandum, p. 25.) Please substantiate the assertion that radius curves longer than 65 feet will not generate wheel squeal. More importantly, there appears to be at least four major turns in the Washington Boulevard Alternative that may have tighter radius turns than even 65 feet, and therefore would generate wheel squeal that must be analyzed. The sharp turns are located at: (1) Via Campo/Garfield Avenue; (2) Garfield Avenue at approximately Beverly Boulevard; (3) Garfield Avenue between approximately Madison Avenue and Repetto Avenue; and (4) Garfield Avenue at Washington Boulevard. Importantly, the Cantwell-Sacred Heart of Mary High School is located directly adjacent to the bend at the Garfield Avenue and Madison Avenue. It is particularly important that wheel squeal be analyzed in this location, given the proximity to the school, residences, and its aerial configuration.

- **Demolition of Commercial Buildings That Serve as Noise Buffers for Residential Homes.**

As described above, this includes the aforementioned homes on Pennant Place as well as on Pico Vista Road. Noise impacts at these receptors will increase merely by the removal of the noise buffers; project noise will further exacerbate these conditions.

- **Removal of Mature Trees That Line the West Side of Garfield Avenue Between Via Paseo and Beverly Boulevard.**

These mature trees shield existing residences along Garfield Avenue from traffic noise, especially the second story bedroom windows that are within feet of the Washington Boulevard Alternative right of way and almost at eye level to the aerial tracks. There are also trees on the east side of Garfield buffering classrooms at the Cantwell-Sacred Heart of Mary School.

- **Lack of Central Air, Necessitating That Residents Sleep with Open Windows At Night During Operation of the Washington Boulevard Alternative.**

For example, the Draft EIS/EIR does not consider that most homes on Garfield Avenue, have second story bedroom windows that will be within feet of the aerial track and at approximately the same elevation. Most of these homes do not have central air conditioning, and thus, the occupants likely will be sleeping at night for a significant part of the year with their windows open during project operations.

4. The Draft EIS/EIR Fails to Perform a Meaningful Analysis of Potential Noise Impacts Caused by the Park and Ride Facilities.

Although the contemplated park and ride facilities would be located within close proximity to sensitive receptors, the Draft EIS/EIR appears to forego any meaningful analysis as to their noise impacts. (See Draft EIS/EIR, p. 4.9-23 stating that the "Washington Boulevard LRT Alternative would have potential sources of noise and vibration during operations: LRV passbys, warning bells associated with at-grade crossings, special track work, TPSS (traction power substation) facilities and maintenance yard activities," but ignoring park and ride stations.) The Draft EIS/EIR must analyze noise impacts on nearby sensitive receptors from idling cars, slamming doors, honking horns, brakes, car alarms, traffic ingress and egress, idling feeder buses and other loud parking structure noises.

5. The Draft EIS/EIR Improperly Omits Consideration of Project Traffic Noise in Determining Noise Impacts.

The Draft EIS/EIR describes that it did not analyze project traffic noise because VMT and VHT would increase by less than one percent between the 2035 No Build and LRT build alternatives, and that such increase would not be acoustically perceptible. (Draft EIS/EIR Appendix T: Noise and Vibration Technical Memorandum, p. 25.) This justification is flawed for a number of reasons. First, traffic noise levels are influenced by, among other things, traffic volumes not by traffic miles or hours traveled. Here, the traffic study shows that traffic volumes will be generally higher on Garfield Avenue and Washington Boulevard in Year 2035 than they are now. Moreover, the Washington Boulevard Alternative in particular will add additional traffic to the study area. Thus, overall traffic noise levels, including project traffic noise, will be higher and should be so analyzed. Second, the Draft EIS/EIR fails to recognize that the Washington Boulevard Alternative will change traffic patterns, as compared to existing conditions and the No-Build Alternative, concentrating more traffic in areas near the stations and park and ride facilities. This additional traffic, more heavily concentrated in specific places along the line will cause more noise in those places that must be considered. Third, roads with more vehicles are generally louder, even if such vehicles are in congested conditions. Engine idling, exhaust, braking and other noises contribute to overall noise levels. This is especially true in this case, where project traffic conditions will create significant and unavoidable traffic impacts leading to gridlock at sixteen intersections. Moreover, traffic noise must be considered in combination with other project noise to understand the true combined noise impact on nearby sensitive receptors.

6. The Draft EIS/EIR Omits Material Information Necessary to Determine the Adequacy of the Noise Analysis.

Please describe precisely where measurements were taken relative to the noise sources and sensitive receptors, the date and time in which measurements were taken, the meteorological conditions which can affect noise, and surrounding site conditions. Please also describe how such measured noise levels were adjusted to account for traffic growth to Year 2035 conditions. This data is necessary to understand whether these representative baseline measurements accurately represent existing and Year 2035 ambient noise conditions. Please describe the distance of each of the eleven monitoring sites to the applicable project noise sources that may impact each of the sites. This data is necessary to understand whether these noise sources are truly representative of other important sensitive receptors in the community.

For construction, please identify the following critical details: (1) distance of each sensitive receptor to closest construction activity(ies); (2) all construction activities/construction noise sources that potentially may generate noise at each sensitive receptor and the length of time each of those construction activities will last; (3) distance of sensitive receptor from major construction noise activities such as staging areas, park and ride demolition and construction sites, maintenance yard demolition and construction site, and guideway construction; and (4) the combined construction noise that can be expected at the property line of each of the noise monitoring locations.

To help illustrate the extent of the noise impacts, please provide maps identifying all sensitive receptors located within 500 feet of: (1) any construction activity/noise source; and, (2) in the case of operations, the Washington Boulevard Alternative right of way. Without the aforementioned information, one simply cannot properly understand the noise impacts, much less determine whether or not such sites actually are representative of the more than 2,100 sensitive receptors located along the Washington Boulevard Alternative.

7. The Draft EIS/EIR Fails to Consider Significant Project Construction Noise Generators.

Here, the Draft EIS/EIR fails to consider noise emanating from construction truck hauling, changes in traffic patterns and related increases in traffic at certain street segments and intersections caused by eliminating lanes and closing roads, and construction work to widen roadways, demolish buildings and remove and reinstall utilities and other infrastructure. These are all significant contributors to noise that must be accounted for.

8. The Draft EIS/EIR Fails to Analyze the Construction Impacts on Greenwood Elementary School.

The Draft EIS/EIR describes that there will be a construction staging area/yard on the site of the future Greenwood station, at the northeast corner of Greenwood Avenue and Washington Boulevard. This construction yard and station will be directly adjacent to the Greenwood Elementary School. Given that construction will be continuous, lasting for a period of six years, and AM peak hour operations generally coincide with school hours (including during the time when students will be walking to class), construction and operation of the Washington Boulevard Alternative may cause significant noise, hazardous air emission, safety, and construction traffic impacts on the school that must be carefully analyzed.

The adverse impacts of excess noise around a school setting and the need to address cumulative increases in noise level has been clearly stated by the courts. In *Los Angeles Unified School District v. City of Los Angeles* (1997) 58 Cal.App.4th 1019, the court held that an EIR for a project that would have increased the noise level around a high school by two decibels in an area which already exceeded the Department of Health's recommended maximum of 70 decibels should not have used the improper ratio theory to find that the project's impacts to noise levels were insignificant. (Id. at 1024-1026.) Greenwood Elementary will suffer continual cumulative noise impacts during the construction period as well as during operations, given the proximity of the staging area/station. This increase in noise must be considered together with project increases in noise from traffic flow.

9. The Draft EIS/EIR Fails to Analyze the Full Range of Reasonably Foreseeable Construction Equipment That Will Be Used.

The Draft EIS/EIR fails to analyze the combined noise impact from construction activities at nearby sensitive receptors, stating that "no specific information on the selection of equipment for each construction activity is available during the environmental analysis phase of the project." (Draft EIS/EIR, p. 4.9-21.) Instead, the noise analysis was limited to a qualitative assessment assuming operation of the two loudest pieces of equipment at full power over 1 hour. (Draft EIS/EIR Appendix T: Noise and Vibration Technical Memorandum, p. 23.) The additive effect of additional equipment operating at the same time cannot be understated and should be analyzed. Moreover, this information is in fact available. The Draft EIS/EIR describes the significant construction activities that will be required, including demolition of buildings and site construction for park and ride facilities and maintenance yards, and both the Draft EIS/EIR and related technical memorandums describe in detail the type of equipment that likely will be used for at-grade track laying and aerial guideway construction. (See Draft EIS/EIR, pp. 4.9-20-21; Draft EIS/EIR Appendix L: Construction Methods Technical Memorandum Addendum, pp. 2-7; Draft EIS/EIR Appendix L: Construction Methods Technical Memorandum, generally.) Further, constructing a parking garage or maintenance facility is neither novel nor particularly

complicated. As such, the construction equipment, including haul trucks, dump trucks, excavators, loaders, dozers, etc., can and should be assumed and its noise should be quantified relative to impact on nearby sensitive receptors. Importantly, the Draft EIS/EIR should make reasonable assumptions and cannot defer this analysis to a later date outside of the EIS/EIR.

D. The Draft EIS/EIR's Analysis and Disclosure of Aesthetic Impacts is Inadequate.

The Draft EIS/EIR correctly notes that, under CEQA, a project will create significant aesthetic impacts if it results in:

- Substantial adverse effects on a scenic vista;
- Substantial damage to scenic resources, including but not limited to trees, rock outcroppings, and historic buildings within (a view from) a state scenic highway;
- Substantial degradation of existing visual character or quality of a site and its surroundings; or
- Creation of a new source of substantial light or glare that would adversely affect daytime or nighttime views in the area. (Draft EIS/EIR, p. 4.6-1.)

In addition to the above criteria, due to the fact that none of the jurisdictions within the Project area have adopted shade and shadow CEQA thresholds, the Draft EIS/EIR elected to utilize the City of Los Angeles's thresholds for this impact area. Specifically, a significant shade and shadow impact would result if new Project-related structures resulted in the shading of shadow-sensitive uses for more than three hours between the hours of 9:00 AM and 3:00 PM Pacific Standard Time (between late October and early April), or for more than four hours between the hours of 9:00 AM and 5:00 PM Pacific Daylight Time (between early April and late October). (Draft EIS/EIR, pp. 4.6-1:2.)

After adopting potential mitigation measures, the Draft EIS/EIR concluded that ***zero*** significant visual/aesthetic impacts would result from the SR 60 Alternative. In contrast, for the Washington Boulevard Alternative, the Draft EIS/EIR identified ***multiple*** significant and unavoidable impacts pertaining to visual character and shade and shadow. (Draft EIS/EIR, p. 4.6-5.) These specific impacts, as well as potential additional impacts that the Draft EIS/EIR failed to account for, are described in more detail below.

1. The Draft EIS/EIR Accurately Identifies Two Significant Visual/Aesthetic Impacts Resulting from the Washington Boulevard Alternative.

The Draft EIS/EIR correctly concludes that construction of the aerial LRT guideway and required columns straddling the roadway along Garfield Avenue between Via Campo and Whittier Boulevard will substantially alter the existing visual character of this neighborhood, which the Draft EIS/EIR describes as consisting of low-scale single-family and multi-family residential uses. (Draft EIS/EIR, p. 4.6-10.) Renderings of this proposed construction provide clear evidence of these resulting visual impacts. (Draft EIS/EIR, p. 4.6-11.)

The Draft EIS/EIR also identifies the significant shade and shadow impacts resulting from the proposed construction along Garfield Avenue between Via Campo and Whittier Boulevard. Specifically, the existing multi-family residences along Garfield and adjacent to the former Rod's Grill Coffee Shop along Garfield Avenue would be shaded for a three-hour period of time during the summer solstice. During the winter solstice, the Our Lady of Miraculous Medal Church and adjacent multifamily residences along Garfield Avenue, the former Rod's Grill Coffee Shop and adjacent multi-family residences along Garfield Avenue, and the multifamily residences across the street from Cantwell-Sacred Heart of Mary High School would all be shaded for a period of three hours or longer. (Draft EIS/EIR, p. 4.6-12.) Therefore, the Draft EIS/EIR correctly concludes that these shade/shadow impacts would be significant, and that no feasible mitigation measures can be implemented to reduce these impacts to a level of insignificance. (Draft EIS/EIR, p. 4.6-15.)

2. The Draft EIS/EIR Inappropriately Dismisses the Significance of the Washington Boulevard Alternative's Construction-Related Visual/Aesthetic Impacts.

The Draft EIS/EIR summarily dismisses visual/aesthetic impacts caused by construction of the Washington Boulevard Alternative, despite acknowledging that a large number of such potential impacts exist. For example, the construction of Segment 2 of the Washington Boulevard Alternative, along Garfield Avenue between Via Campo and Whittier Boulevard, will create the following impacts:

- Existing views being replaced by views of construction walls for patrons of the Our Lady of the Miraculous Medal Church, golfers at the Montebello Golf Course, recreational patrons at Bicknell Park, patrons of the commercial businesses located adjacent to the proposed construction staging area and future station site, and motorists traveling north and south on Garfield Avenue;

- Existing views being replaced by "vast and evolving views of various phases of construction" for occupants of residential buildings along Garfield Avenue;

- Creation of a "visual nuisance" for patrons of Ashiya Park and students, faculty, and staff of Cantwell Sacred Heart of Mary High School;

- "Intersection" of existing views from within the existing Montebello Park Historical District; and

- Disturbance of existing views of numerous sensitive uses, including Montebello Golf Course, Bicknell Park, Our Lady of Miraculous Medal Church, private residences, Cantwell-Sacred Heart of Mary High School, the "Montebello Welcomes You" marquee, and Ashiya Park. (Draft EIS/EIR Appendix Q: Visual And Aesthetic Impacts Technical Memorandum, pp. 78-80.)

However, despite describing in detail the significant disruption in existing views both from and of these sensitive uses, the Draft EIS/EIR simply concludes that these impacts will be insignificant due to the "short-term" nature of the construction activities. (Id., p. 80.) This statement is not accurate, as the construction of the Washington Boulevard Alternative is proposed to take a total of approximately six years – hardly a "short-term" activity. By inappropriately characterizing these construction-related impacts pertaining to visual character and aesthetics as merely temporary in nature, the Draft EIS/EIR fails to adequately analyze their significance.

3. The Draft EIS/EIR Fails to Accurately Assess the Significance of Other Operation-Related Visual/Aesthetic Impacts Resulting from the Washington Boulevard Alternative.

Much as the Draft EIS/EIR dismisses the significance of the identified construction-related visual and aesthetic impacts of the Washington Boulevard Alternative, it similarly fails to acknowledge the significance of many of the permanent operational impacts that are identified for this Alternative. One example of this is the permanent impairment of public views of the San Gabriel Mountains, Puente Hills, and the City of Los Angeles skyline that will occur as a result of the construction of the Washington Boulevard Alternative. Each of these impaired views are specifically identified by the Draft EIS/EIR, but the significance of any such impairment is summarily dismissed for one reason or another. For example, despite the fact that the public views of the downtown Los Angeles skyline from Washington Boulevard west of Bluff Road are deemed "exceptional," the impairment of these views is deemed insignificant simply because Washington Boulevard is not designated as a local scenic highway by the City of Montebello. (Id., p. 50.) Elsewhere, the Draft EIS/EIR, after noting that the public is able to view the Los Angeles skyline, the San Gabriel Mountains, and the Puente Hills from along the Washington Boulevard Alternative alignment, states that these scenic resources "are only visible on clear days," implying that impairment of these views cannot rise to a level of significance, because

sometimes atmospheric conditions limit the public's view of these resources. (Draft EIS/EIR, p. 4.6-10.)

These are not adequate assessments of the significance of an impact to a visual resource, for CEQA does not require such a street or highway to be locally designated as a scenic route in order to consider an impact to an existing scenic resource to be significant. Furthermore, nowhere does CEQA consider a scenic resource's significance to vary depending on the level of haze or smog in the air. While California case law can be understood to be largely deferential to a lead agency's determinations regarding aesthetic impacts, here the Draft EIS/EIR has not provided the sufficient factual evidence that is required to support its conclusion that the Washington Boulevard Alternative's impairment of the public's views of the Los Angeles skyline, the San Gabriel Mountains, and the Puente Hills will be insignificant. (*North Coast Rivers Alliance v. Marin Municipal Water District Board of Directors* (2013) 216 Cal.App.4th 614, 627, citing *Eureka Citizens for Responsible Government v. City of Eureka* (2007) 147 Cal.App.4th 357, 375-377.)

4. The Draft EIS/EIR Identifies Multiple Potentially Significant Impacts Resulting from the Construction of the Washington Boulevard Alternative, But then Fails to Identify Those Same Impacts as Significant During Operations.

Another example of the Draft EIS/EIR's failure to accurately assess the number and severity of the visual/aesthetic impacts resulting from the Washington Boulevard Alternative can be found by looking once again at the Draft EIS/EIR's construction-related visual/aesthetics impacts section. For instance, as noted above, the construction impacts section describes the "temporary" visual impacts for users of the Montebello Golf Course and Bicknell Park resulting from the creation of construction staging areas, use of construction walls, and removal of existing trees along Garfield Avenue. (Draft EIS/EIR Appendix Q: Visual And Aesthetic Impacts Technical Memorandum, pp. 78-79.) Of course, at the conclusion of these construction activities, these "temporary" construction impacts will be replaced by the presence of a permanent aerial LRT guideway placed atop over eighty support columns straddling Garfield Avenue, and the permanent removal of the trees that currently line the western side of Garfield. However, in relation to these operational visual and aesthetic impacts, the Draft EIS/EIR simply concludes that "direct views of the elevated alignment would continue to be obscured by trees located within Bicknell Park and the Montebello Golf Course. . . [which] would not significantly alter the views experienced by these two sensitive viewer groups." (Id., p. 88.) This conclusion is unsupported, for if the construction-related visual impacts could be seen by the patrons of Bicknell Park and the Montebello Golf Course (and are thought to potentially be significant, but for the allegedly temporary nature of the construction activities), it does not follow that the operations-related visual impacts could ***not*** be seen due to existing on-site trees within the park

and golf course. The Draft EIS/EIR's conclusion that this particular operational visual impact is less than significant is not supported by substantial evidence, and must be further analyzed.

As another example, the Draft EIS/EIR states that the construction of the Whittier Boulevard station would "temporarily obstruct views, detract from the 'Montebello Welcomes You' marquee at the city limit line, and alter the visual character along the corridor for the short-term." (Id., p. 79.) Again, these impacts are deemed insignificant only because of the "temporary" nature of the construction. (Id.) And once again, following the completion of this construction, a new aerial LRT station will have been built above Garfield Avenue, therefore permanently altering the area's previously existing visual character. However, when discussing operational impacts at this location, the Draft EIS/EIR concludes that "although new visual elements associated with the station and park and ride structure may contrast with the existing scale of the surrounding area, it may also enhance the commercial character of the area." (Id., p. 91.) The Draft EIS/EIR goes on to state that, following construction of the Whittier Boulevard station, partial views of the "Montebello Welcomes You" sign will still be available from the station location, and clear views of the sign from Whittier Boulevard will exist. (Id.) Therefore, the Draft EIS/EIR concludes, "visual impacts at this location would be less than significant." (Id.) Again, it is completely inconsistent for the Draft EIS/EIR to note that potentially significant impacts would result from the construction of the proposed LRT guideway and station at Whittier Boulevard, but then conclude that the as-built guideway and stations would not result in any significant visual impacts.

Finally, the Draft EIS/EIR notes the existence of the Montebello Park Historic District, which "represents one of the largest and most defined master planned residential communities in the Los Angeles region from the mid-1920s." (Id., p. 47.) The Draft EIS/EIR further states that:

> Implementation of the aerial guideway along Garfield Avenue would intersect views from Northside Drive, Olympic Boulevard, and Southside Drive within the historical district, a location that is ***visually sensitive***. Residential viewers typically have a ***high level of sensitivity*** to any changes to foreground views due to their desire to preserve an attractive neighborhood environment near their homes. The residential areas located immediately adjacent to the alignment would have views of construction activities associated with building the aerial structures. . . . ***[T]his would temporarily affect the neighborhood***. . . ." (Id., p. 79.)(Emphasis added)

Then, when describing the operational impacts of the Washington Boulevard Alternative upon the Montebello Park Historic District, the Draft EIS/EIR once again describes the high level of sensitivity of the residents of the district to impacts on their foreground views, and confirms that

"the homes located immediately adjacent to the alignment would have vast views of the columns and aerial guideway." (Id., p. 91.) Notwithstanding these repeated acknowledgments of residents' high sensitivity to changes in the foreground views, and confirmation that these foreground views will in fact change due to the Washington Boulevard Alternative, the Draft EIS/EIR concludes, without providing any supporting evidence, that any such changes will result in less than significant visual or aesthetic impacts, because the street layout within the historical district will not itself be "damaged or removed." (Id.) To raise the issue of a particularly high sensitivity to changes in visual character, confirm that such changes will in fact occur, and then explain away the significance of any visual impacts by claiming that these are not in fact the type of changes that "count" as significant impacts, is wholly unsatisfactory in an environmental document.

The Draft EIS/EIR does describe the existence of several significant and unavoidable visual and aesthetic impacts along the Washington Boulevard Alternative. However, by repeatedly engaging in the unsupported form of analysis described above, the Draft EIS/EIR ends up significantly understating both the number and severity of specific visual and aesthetic impacts that will be created by the Washington Boulevard Alternative.

5. The Draft EIS/EIR's Proposed Mitigation Measures for Certain Identified Visual/Aesthetic Impacts Are Inadequately Defined and Lack Performance Standards.

By failing to adequately define specific mitigation measures for the loss of existing trees along the Washington Boulevard Alternative's alignment, the Draft EIS/EIR is deficient. Specifically, due to the proposed alignment down the middle of Washington Boulevard, this Alternative will require the removal of all existing trees located in existing medians. Furthermore, along portions of the alignment where bends are required (i.e., Garfield Boulevard), existing trees along each side of the roadway will also need to be removed. However, the Draft EIS/EIR's mitigation measures to mitigate the impacts caused by the removal of these trees are vague, undefined, and inadequate.

Specifically identified trees that will need to be removed include:

- Mature trees along both sides of Garfield Avenue near the Montebello Golf Course and Bicknell Park (which are a "dominant visual feature") (Draft EIS/EIR, p. 45.);

- Street trees lining Garfield Avenue near Cantwell Sacred Heart of Mary High School (which "provide shade") (Id.);

- Large mature trees in the median of Washington Boulevard between Bluff Road and the end of the Rio Hondo Coastal Basin Spreading Grounds (which are "a visually

defining feature") (Id., p. 50.);

- Trees in the landscaped median of Washington Boulevard to the east and west of Passons Boulevard (which were planted by the City of Pico Rivera to "protect the neighborhood's visual quality and provide a buffer between the residential area and Washington Boulevard") (Id., p. 53.); and

- Mature palm trees in the median of Washington Boulevard in the City of Santa Fe Springs (which "create a strong vertical element for the length of Washington Boulevard" and "are a visually defining feature of the community") (Id., p. 55.).

Given the language in the Draft EIS/EIR about the important role that these identified trees play in defining the visual character of the neighborhoods along the Washington Boulevard Alternative alignment, it would be expected that the Draft EIS/EIR would provide great detail regarding the proposed mitigation for the loss of these visual resources. This is not the case. Instead, the Draft EIS/EIR has provided only minimal information regarding its proposed mitigation of these tree removals. For example, the Draft EIS/EIR claims the permanent removal of the mature trees in the Washington Boulevard median where it bisects the Rio Hondo Coastal Basin Spreading Grounds will be mitigated by relocating or replacing those trees on both sides of Washington Boulevard to "recreate a visual effect similar to what currently exists." (Id., p. 80.) However, nowhere does the Draft EIS/EIR mandate the number or type of trees that would be replaced or relocated to the sides of Washington Boulevard, nor does it include any assessment of how the aesthetics of the replaced or relocated trees would be "similar" in comparison to the visual character that exists today. In fact, the conceptual visual simulation of the proposed LRT in this precise location shows no new or replaced trees along the sides of Washington Boulevard. (Id., Figure 5-12, p. 98.)

The Draft EIS/EIR proposes the same relocation/replacement of trees from the median to the sides of Washington Boulevard for the tall palm trees in Santa Fe Springs (Draft EIS/EIR Appendix Q, p. 82.) But again, no specific planting/replanting plan is provided, nor is there any assessment or simulation of what the "recreated" visual character of Washington Boulevard might look like afterwards. CEQA requires that substantial evidence supports a lead agency's conclusion that a mitigation measure will reduce an impact to a less than significant level. (*Oakland Heritage Alliance v. City of Oakland* (2011) 195 Cal.App.4th 884, 898-899.) By failing to include such substantial evidence, the Draft EIS/EIR's claim that the removal of the existing trees along the Washington Boulevard Alternative alignment can be mitigated cannot be seen as plausible.

E. The Draft EIS/EIR Fails to Account for Critical Project Components that Will Contribute Additional Air Emissions.

The Draft EIS/EIR fails to account for the large amount of building demolition that will be required to accommodate the Washington Boulevard Alternative. These demolition activities will be substantial and much more intense, requiring at least 49 buildings to be torn down (as compared to around eight under the SR 60 Alternative). This will result in greater hazardous air emissions during construction. With regard to operational air emissions, the Washington Boulevard Alternative will cause significant and unavoidable traffic impacts at sixteen local intersections (as compared to none under the SR 60 Alternative). This translates to sixteen congested intersections, where cars and trucks will be queued up and idling for extended periods of time. Extended vehicle idling caused by traffic delays emits hazardous air contaminants that must be accounted for.

1. The Draft EIS/EIR Fails to Meaningfully Describe Building Demolition Activities, Including Total Cubic Feet of Buildings That Will Be Demolished, or Quantify and Analyze the Substantial Construction Air Emissions That Would Result.

Although the Draft EIS/EIR is unclear, it appears that at least 49 buildings would be demolished under the Washington Boulevard Alternative.[14] Such activities will result in additional air emissions that are unaccounted for in the Draft EIS/EIR. Demolition activity and soil disturbance creates fugitive particulate matter (PM) dust. Such activities also result in exhaust emissions of PM and oxides of nitrogen from fuel combustion for mobile heavy-duty diesel and gasoline-powered equipment, haul trucks, and worker commute trips. Demolition of structures and earth disturbances may also result in airborne entrainment of asbestos. Given the significant amount of demolition activities required under the Washington Boulevard Alternative and the proximity to sensitive receptors, this phase must be analyzed.

2. The Draft EIS/EIR Fails to Analyze CO Hot Spots at 16 Intersections That Will Have Significant and Unavoidable Traffic Impacts.

A carbon monoxide (CO) hot spot is a localized concentration of CO that is above the state or national 1-hour or 8-hour CO ambient air standards. Localized high levels of CO are associated with traffic congestion and idling or slow-moving vehicles. Numerous studies have established that a larger number of cars operating at optimal speed will emit fewer air

[14] The Draft EIS/EIR describes that the Washington Boulevard Alternative would "acquire" 65 parcels, including partial acquisition as easement of five parcels, partial acquisition in fee of six parcels, and full acquisition of 54 parcels. (Draft EIS/EIR, p. 4.3-11-15.) Draft EIS/EIR Table 4.3-6 shows that most of these parcels are improved with buildings with various uses. Based on this table, there appear to be at least 49 buildings that would demolished, although total cubic yards is unclear.

contaminants than a smaller number of cars idling for long periods at congested intersections. Here, the Washington Boulevard Alternative will create significant and unavoidable impacts at sixteen intersections, leading to increased CO levels from congestion and vehicle idling. Most of these intersections are near sensitive receptors, including homes and schools. However, the Draft EIS/EIR fails to consider the majority of these intersections or account for the additional CO that will be emitted from more cars idling at these intersections for longer periods of time.

The South Coast Air Quality Management District ("SCAQMD") recommends that a local CO hotspot analysis be conducted if the intersection meets ***one*** of the following criteria: 1) the intersection is at LOS D or worse and where the project increases the volume to capacity ratio by 2 percent, ***or*** 2) the project decreases LOS at an intersection from C to D. The Draft EIS/EIR focuses on the first criteria but ignores the second. Notably, there are a number of intersections that are in close proximity to sensitive receptors which satisfy SCAQMD's second criterion and therefore require a CO hotspot analysis to determine whether they will be significantly impacted by the project (see *e.g.*, intersections 21, 23, 24, 25, 28, 29, 30, 31, 32 and 34). This information is critical to an informed decision and the failure to analyze and disclose these impacts renders the air analysis under the Washington Boulevard Alternative deficient.

F. The Washington Boulevard Alternative Would Have a Greater Potential for Impacts from Release of Hazardous Materials in Contaminated Soil and/or Groundwater.

As previously described in Section I.M (above), both build alternatives cross over locations which contain hazardous materials. Although impacts can be mitigated to less than significant, the Draft EIS/EIR determined that the Washington Boulevard Alternative would have a greater potential for impacts from release of hazardous materials in contaminated soil and/or groundwater and exposure to sensitive receptors because it would be located within residential neighborhoods in close proximity to schools and other sensitive receptors. (Draft EIS/EIR, p. 4.11-40.) This is meaningful, especially considering that the Washington Boulevard Alternative will place the at-grade Lambert Road station and park and ride facility directly over this active contamination site.

A part of the SR 60 Alternative aerial alignment (and North Side Design Variation) would pass through the Operating Industries, Inc. ("OII") former landfill site, within the Caltrans right-of-way. The EPA has issued final Records of Decision for cleanup remedies at the site, the site has been covered with a clay cap, and remediation continues to be successfully implemented. Moreover, the approved Monterey Park Marketplace Project located on Potrero Drive will be constructed just north of the former OII landfill site in the same general area as the SR 60 Alternative. The certified EIR for this project did not identify a significant cancer risk associated with proximity to the OII landfill for employees and patrons at the commercial site or impacts from landfill remediation activities. (Draft EIS/EIR Appendix V: Geotechnical

/Seismic/Hazardous Materials Technical Memorandum, p. 53.) Importantly, the Draft EIS/EIR concluded that mitigation requiring compliance with federal, state and local laws and regulations during construction and operations would ensure impacts are less than significant.

The Washington Boulevard Alternative overlies a portion of the Omega Chemical Corporation OU2 groundwater plume, where high concentrations of volatile organic compounds occur in the groundwater. The Lambert Road station and park and ride facilities would be constructed at-grade, over this plume. Importantly, the Draft EIS/EIR determined that: (1) there is the potential for intrusion vapors from the groundwater plume into at-grade structures; (2) further investigation of soil vapor concentrations at proposed station locations and park and ride areas would be warranted to determine if there would be a concerns from vapor intrusion of VOCs into buildings; and (3) overall, there is a greater potential for impacts from release of hazardous materials in contaminated soil and/or groundwater and exposure to sensitive receptors because the Washington Boulevard Alternative would be located within residential neighborhoods in close proximity to schools and other sensitive receptors. (Draft EIS/EIR, pp. 4.11-39-40.)

G. The Draft EIS/EIR Fails to Consider of Loss of Sales Tax and Other Local Revenue, As Well as the Potential for Urban Decay that Could Result from Implementation of the Washington Boulevard Alternative.

NEPA requires the consideration of the economic effects of a proposed action. Here, the Draft EIS/EIR makes several unsupported assumptions and conclusions and otherwise unduly limits consideration of economic impacts to the loss of property tax revenue. This provides an incomplete picture of the negative economic impacts that will result from construction and operation of the Washington Boulevard Alternative.

Construction of the Washington Boulevard Alternative will last up to six years, permanently displacing 58 businesses and approximately 633 employees; 17 more businesses and 144 more employees if the Santa Fe Springs Maintenance Yard is selected. It will also seriously disrupt commercial and industrial businesses that remain by impairing customer access and parking, reducing visibility of commercial signs and businesses, and impeding goods movement down Washington Boulevard including access to the numerous local warehouses and distribution centers. These foreseeable economic impacts must be considered and disclosed. Rather than performing the requisite analysis, the Draft EIS/EIR simply concludes that construction impacts are "temporary," and any resulting negative economic consequences during this period will be recovered by the construction jobs created. This is flawed. For one, six years of continuous construction is far from temporary. Even a single year of poor sales can force a local proprietor out of business or otherwise incentivize a business to relocate out of the area. Relatedly, new businesses will not move into an area that will be under construction for multiple years. This not only impacts those business owners currently operating on an individual basis,

but also the local jurisdiction in which they operate due to lost property and sales tax revenue, business license fees, utility user taxes, parking revenue, and other business and resident-based revenues. The Draft EIS/EIR makes no attempt to quantify or value this in any way.

The Draft EIS/EIR also misleadingly equates the likely loss of local revenue with the potential gain of construction job earnings. These two are not the same for a variety of reasons. For one, businesses and employees that have been displaced obviously cannot simply pick up and become construction workers, working on the Washington Boulevard Line. Thus, they will be individually and significantly impacted. The ability for them to find new locations for their business and new jobs is dependent on a host of factors that are not adequately assessed here. Moreover, displacing local businesses during the six-year construction period but adding construction jobs does not make the impacted jurisdiction whole. It instead effectuates a form of wealth transfer, decreasing local property, sales tax and other revenues that would have otherwise been paid to cities, but increasing earnings of outside construction companies working on the LRT. These companies do not generate local sales tax dollars nor do they pay local property taxes; thus, the majority of this lost revenue never makes it back into the local economy. Moreover, there are no assurances that these construction jobs will even be local hires. Again, this is a six-year construction period. The economic impacts during construction need to be taken more seriously.

With regard to operations, the Draft EIS/EIR unduly limits its consideration of economic impacts to property tax revenue, which is only part of the equation. Loss of sales tax is a major city revenue that must be accounted for. Although cities vary widely, on average, sales and use tax revenue provides 30 percent of city's general purpose revenue and often as much as 45 percent. (League of California Cities: A Primer on California City Finance, March 2005.)[15] The loss of this revenue attributed to the displacement of existing businesses and interruption of those that remain during construction must be disclosed, as well as revenue from business license fees, utility user taxes, parking revenue, and other business and resident-based revenues. Finally, it is clear that while proximity to access points at rail stations may have a positive influence on business, proximity to just the light rail line itself without close access to the station may have negative economic impacts. These properties would still be subject to the negative externalities such as noise and traffic and but would not receive the benefits of associated with accessibility. The Draft EIS/ER must study and disclose this.

Given the economic concerns expressed above, the potential for physical urban decay impacts to occur during the six year construction period must be evaluated. Displacement of businesses and jobs, loss of city revenue that could otherwise be used to remediate blighted areas, reduced sales for businesses that remain during the six year construction period, and the substantial disruption of goods movement along Washington Boulevard (due to traffic impacts

[15] Available at http://www.californiacityfinance.com/FinancePrimer05.pdf, accessed on October 13, 2014.

and incompatible uses) could lead to blighted conditions in the area. CEQA Guidelines section 15131(b) states that "[e]conomic or social effects of a project may be used to determine the significance of physical changes caused by a project. For example, if the construction of a new freeway or rail line divides an existing community, the construction would be the physical change, but the social effect on the community would be the basis for determining that the effect would be significant." Here, in addition to significant local economic impacts, the Washington Boulevard Alternative also would impose significant and unavoidable social and physical impacts on the community, dividing an existing neighborhood, imposing significant shade/shadows during daytime hours, degrading community aesthetics, and increasing traffic congestion. These factors could combine to create urban decay, and the affected cities would have substantially less money to remedy them.

H. The Washington Boulevard Alternative Will Result in a Loss of Privacy for Area Residents and Schools.

Residents along the east side of Garfield Avenue between Via Paseo and Beverly Boulevard will lose much of their existing privacy if Washington Boulevard Alternative is constructed with aerial tracks that would run directly in front of their second story bedroom windows. The same can be said for the high school-aged children at Cantwell-Sacred Heart of Mary High School, where the aerial track would have a direct view into second-story classrooms and school grounds. This would constitute a "taking" of a reasonable expectation of privacy that these homes and schools currently have. The Draft EIS/EIR provides no discussion of this at all and it does not mitigate the loss of privacy that would occur.

I. The Draft EIS/EIR Fails to Substantiate the Feasibility of Mitigating the Washington Boulevard Alternative's Significant Impact on the Historic Chinese Garden Restaurant.

The Draft EIS/EIR describes that there is only one historic property (Helms Bakery) and one CEQA historic resource (Chinese Garden Restaurant) located in the area of the SR 60 Alternative, and neither would be significantly impacted. By comparison, the Washington Boulevard Alternative has 13 historic properties and three additional CEQA historic resources. Further, the Washington Boulevard Alternative requires the demolition of the Chinese Garden Restaurant to accommodate the Garfield Avenue station. While this impact arguably could be mitigated by relocating the building, the overall impact to historic resources is nonetheless greater under the Washington Boulevard Alternative.

Moreover, the Draft EIS/EIR does not provide any evidence as to whether relocation of the Chinese Garden Restaurant actually is feasible. Is there sufficient room on the existing site to accommodate the relocated building? In the alternative, is there a similar lot available on Garfield Avenue that could accommodate this building and that is compatible with the character

and use of the original location. Is the building in a condition such that it could withstand relocation without incurring damage to important historical characteristics? That this relocation can actually be feasibly accomplished must be substantiated. Should this measure prove infeasible, the Washington Boulevard Alternative's impact to this historic resource would be significant and unavoidable. (Draft EIS/EIR Appendix Y: Cultural Resources Technical Memorandum, pp. 73, 94.)

J. The Draft EIS/EIR Omits Consideration of Future Projects that Will Combine with the Washington Boulevard Alternative to Impact Traffic

A cumulative impact consists of an impact which is created as a result of the combination of the project together with other past, present, or future projects causing related impacts. (CEQA Guidelines § 15130(a)(1).) The Draft EIS/EIR must analyze the cumulative impacts of the project in combination with past, present and foreseeable future projects, and not in relation to them. (CEQA Guidelines § 15130, 15355.) The agency also should define the geographic scope of the area affected by the cumulative effect and provide a reasonable explanation for the geographic limitation used. (CEQA Guidelines § 15130(b)(3).)

1. The Draft EIS/EIR Omits Consideration of Simultaneous Closure of Multiple At-Grade Crossings Along the Washington Boulevard Alternative and UPRR Crossings.

The Washington Boulevard Alternative proposes twelve at-grade crossings, ten of which are located on Washington Boulevard. Two different segments along Washington Boulevard each consist of four crossings in short succession within approximately 1/4 mile for the following streets: (1) Paramount Boulevard, Crossway Drive, Rosemead Boulevard, and Passons Boulevard, and (2) after the San Gabriel River, Pioneer Boulevard, Norwalk Boulevard, Broadway Avenue and Sorenson Avenue. Most of these streets are major arterials. The cumulative traffic impact of nearly simultaneous closure of all four streets where they intersect Washington Boulevard will be significant since the light rail crosses these streets as frequently as every 2 1/2 minutes with crossing gates preventing north/south traffic flow for up to 40 seconds per train crossing. (Draft EIS/EIR, 4.16-5.) The Draft EIS/EIR did not study the cumulative impacts of the four intersections being closed virtually simultaneously within 1/4 of a mile. These impacts will be further intensified when trains on the UPRR tracks north of the site cross Vail, Maple, and Greenwood Avenues, as well as Montebello Boulevard. These trains currently block traffic when traveling across these at-grade crossings. The Draft EIS/EIR must account for the above-stated present and future conditions in determining the Washington Boulevard Alternative's cumulative impacts.

2. The Draft EIS/EIR Fails to Consider Cumulative Traffic Impacts in Combination with the Planned Washington Boulevard Project.

According to the Gateway Cities Council of Governments Strategic Transportation Plan, the Washington Boulevard Project will widen Washington Boulevard from four lanes to six lanes (3 lanes in each direction) at Indiana Street near the BNSF intermodal facility to I-5/Telegraph Road. (Gateway Cities Council of Governments Strategic Transportation Plan: Arterial Smart Corridor Projects Final Report, August 14, 2014, p. 4-1.)[16] Due to latent and induced demand, increasing vehicle capacity on this roadway will lead to more traffic, including heavy truck traffic from the BNSF yard. This additional traffic will be funneled directly into the Washington Boulevard Alternative onto Washington Boulevard and Garfield Avenue and neither street will have the capacity to handle it. The Washington Boulevard Alternative reduces Washington Boulevard from three to two through lanes in each direction and Garfield Avenue to one through lane. The cumulative impact of the Washington Boulevard Alternative, which reduces roadway capacity and adds project traffic, in combination with Washington Boulevard project which will add more traffic into the Washington Boulevard Alternative project area must be analyzed.

3. The Draft EIS/EIR Fails to Consider Cumulative Traffic Impacts in Combination with the Planned ACE Project.

The Draft EIS/EIR also fails to analyze the cumulative impact of the proposed Alameda Corridor East Construction Authority ("ACE") project in the City of Montebello. The ACE project is currently under consideration, and is intended to address congestion and safety issues caused by the UPRR at-grade crossings on Vail Avenue, Maple Avenue, Greenwood Avenue, and Montebello Boulevard. The Draft EIS/EIR must analyze the potential for cumulative impacts associated with the Washington Boulevard Alternative in combination with the potential alternatives under consideration by ACE to remedy the traffic and safety issues associated with these at-grade crossings.

K. Evaluation of Alternatives

1. The Draft EIS/EIR Fails to Account for over 2 Million Visitors Per Year to the Whittier Narrows Recreation Area in its Calculation of Daily Linked Trips and Average Weekday Daily Boardings.

As described in Section I.K, data compiled by the Los Angeles County Department Parks and Recreation show that the number of visits to the Recreation Area has varied between 2.0 and 2.5 million visits per year since 2006, which is equivalent to between approximately 5,500 and 6,800 visitors per day. (Visioning Whittier Narrows: Whittier Narrows Dam Basin Recreation

[16] Available at www.gatewaycog.org/download/ Strategic Transportation Plan/Arterial Smart Corridor Projects.pdf, accessed on October 13, 2014.

Area Master Development Plan Input, pp. 17-18.) Importantly, the County's figures underestimate the actual number of visitors, as they do not include visitors to the Recreation Area's golf course, tennis center, or nature center. (Id.) However, the Draft EIS/EIR does not discuss these significant visitor numbers in connection with its projected ridership numbers for the SR 60 Alternative. Moreover, the Draft EIS/EIR's ridership projections only used average ***weekday*** ridership estimates, and did not include weekend riders. This decision would likely significantly depress the ridership numbers for the SR 60 Alternative, as most trips to the Recreation Area will be made on weekends, instead of on a weekday. Finally, although it is difficult to determine from a review of the Draft EIS/EIR's travel demand modeling technical memorandum (contained in Appendix II of the Draft EIS/EIR), the Draft EIS/EIR may have used a general annualized region-wide recreational trip-factor to estimate travel demand for both the SR 60 Alternative and the Washington Boulevard Alternative, instead of looking at the unique characteristics of the Recreation Area relative to its size, breadth of recreational opportunities, very large number of annual visitors, and immediate proximity to one of the SR 60 Alternative's planned stations. These unique characteristics would drive increased travel demand numbers for the Recreation Area, and the Santa Anita Station proposed for the SR 60 Alternative.

2. Metro Must Adopt the Environmentally Superior SR 60 Alternative.

Under CEQA, if one or more significant impacts will not be avoided or substantially lessened by mitigation measures, the environmentally superior alternative described in the EIR must either be adopted or found infeasible. (Pub. Res. Code § 21081(a)(1-3); CEQA Guidelines § 15091(a)(3).) Here, the Draft EIS/EIR determined that the SR 60 Alternative is the environmental superior alternative. Accordingly, because the Washington Boulevard Alternative will result in significant and unavoidable impacts, Metro must either adopt the environmentally superior SR 60 Alternative or find that it is infeasible. We submit that the record does not support an infeasibility determination with regard to the SR 60 Alternative, and therefore, the SR 60 Alternative must be adopted. Importantly, "feasible" is defined as capable of being accomplished in a successful manner within a reasonable period of time, taking into account economic, environmental, legal, social, and technological factors. (CEQA Guidelines § 15364.) None of these factors are satisfied in this instance, as described below.

- Project Objectives – The Draft EIS/EIR describes that both build alternatives fully satisfy the project objectives. (Draft EIS/EIR, p. 6-6, 6-11.) Moreover, Section I of this letter (above) further substantiates that it is the SR 60 Alternative which best meets the Project's purpose and objectives.

- Economic – The Draft EIS/EIR describes that capital costs to construct the Washington Boulevard Alternative are significantly higher, by between approximately $154 and $365 million more depending on which design variations are ultimately constructed. (Draft EIS/EIR, p. 6-2.) Moreover, the Washington

Boulevard Alternative will displace significantly more business and homes, and otherwise exact more economic damage during the six year construction period on individuals and local jurisdictions than the SR 60 Alternative. Sections I.A, C and J (above) further substantiate that the SR 60 Alternative provides greater economic and fiscal benefits than the Washington Boulevard Alternative.

- Environmental – The Draft EIS/EIR concludes that the SR 60 Alternative is the environmentally superior alternative because it would not cause any unavoidable adverse effects of significant impacts under NEPA or CEQA. (See Section I.B, above.)

- Legal – The Draft EIS/EIR describes that the SR 60 Alternative requires significantly less acquisition via legal eminent domain proceedings and can be constructed within existing state-owned right of way, along a regional transportation corridor of similar purpose and use. The SR 60 Alternative would require only the partial acquisition of twelve parcels and full acquisition of eleven parcels, whereas the Washington Boulevard Alternative would require the acquisition of 65 parcels, including the partial acquisition of eleven parcels and full acquisition of 54 parcels. (Draft EIS/EIR, p. 4.3-6-11.) This is more particularly described in Section I.J (above). Moreover, the Washington Boulevard Alternative will require significantly more CPUC oversight and approvals due to its numerous at-grade crossings.

- Social – The Draft EIS/EIR describes that the Washington Boulevard Alternative would (i) adversely alter the social and physical character, and (ii) substantially change the visual character of the existing community along Garfield Avenue in the City of Montebello. It removes important community resources (i.e., the Chinese Garden Restaurant and mature trees on the west side of Garfield Avenue), changes the visual scale of the community (via aerial guideways, support beams and columns that divide an existing neighborhood), and generates prominent shade/shadows. These social factors result in adverse effects under NEPA and significant impacts under CEQA. Section I (above) further describes the additional positive social factors associated with the SR 60 Alternative.

- Technological – While both build alternatives may technically be feasible, the SR 60 Alternative costs less to build, and takes a full two years less time to complete.

We hope you agree that the SR 60 Alternative is clearly superior in all respects. Once again, we appreciate the opportunity to comment on the Draft EIS/EIR.

Sincerely,

Brady R. McShane

Brady R. McShane

cc: Anthony R. Ybarra, City Manager, City of South El Monte
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EXHIBIT A

Station	Draft EIS/EIR Station Improvements	Draft EIS/EIR Development Opportunities	SR 60 TOD Report Development Opportunities
Garfield Station	The Draft EIS/EIR describes the Garfield Avenue station as a center platform station located within the SR 60 right of way ("ROW") east of Garfield Avenue along Via Campo Street in the City of Montebello. Station facilities, such as kiss and ride space and a park and ride structure, would be located near the southeast corner of Garfield Avenue and Via Campo Street. (Draft EIS/EIR Appendix N: Land Use and Development Opportunities Technical Memorandum, pp. 31-36.)	• Pedestrian access to the Garfield Station would be provided via crosswalks at street level, as well as by a bridge across Via Campo Street. • The site could be developed as an end-of-line stop for buses operating to and from communities to the east via freeway flyer services along SR 60, which would also encourage TOD in the area. ***Overall, the accessibility to and from this location would promote future development.*** • The existing commercial uses to the north of the SR 60 Freeway, along Pomona Boulevard and Garfield Avenue, ***also present the potential for transit oriented, mixed-use development along the corridor.*** • The City of Monterey Park General Plan encourages the gradual redevelopment of residential properties fronting Pomona Boulevard between Bella Vista Park and Fulton Avenue, which are designated	• New "focal place" plaza connected to park and ride structure; • New east-west pedestrian scaled street (extension of Via San Clemente) as "spine" for small block mixed-use retail/office uses on north side and multifamily residential podium courts on south side • Expanded depth parcel at southwest quadrant for mixed-use retail/office and multifamily residential podium courts • Opportunity for multistory offices at both corners of Garfield at Pomona Avenue as a gateway into Monterey Park • Acquisition of selected residential lots, at key locations, to provide access points to east side of Garfield, via short paseos through commercial zone, to vastly expand ridership accessibility to Metro station. • Total potential TOD program – 1.1 million sf, and over 1,000 dwelling units

EXHIBIT A

Station	Draft EIS/EIR Station Improvements	Draft EIS/EIR Development Opportunities	SR 60 TOD Report Development Opportunities
		Mixed-Use II, with commercial businesses. Construction of the Garfield Avenue station would encourage this redevelopment. (Id., p. 45.)(Emphasis added.)	
Shops at Montebello Station	An aerial, center platform station would be located on private property adjacent to the Shops at Montebello. Facilities would include an offstreet bus plaza, kiss and ride space, and a park and ride structure, which would be located at the northwest portion of the mall property adjacent to the Town Center Drive/Montebello Town Center intersection. (Id., p. 36.)	• Pedestrian access would include a bridge connection to a vertical circulation element across Town Center Drive, which could be integrated into a parking structure or TOD. • There is ***potential to expand commercial/business development*** at the western end of the shopping center on the surface parking lot. • A medical office building currently exists to the west of the Shops at Montebello across Montebello Town Center roadway which, if expanded, ***could serve as an employment destination***. • Future expansion of office/light industrial land uses could create a small employment hub around future transit investments. • The Montebello Hills Specific Plan development, along with	• New pedestrian bridge from station can link over SR 60 to northside neighborhoods • Larger hotel directly adjacent to mall can be expanded by adding structured parking to better serve visitors • Underutilized parcel south of hotel has potential for office complex development • Existing Kaiser medical office site has potential to be expanded • South side of mall has potential for new multifamily residential podium courts and multistory apartments, along with replacement parking, adding on-site residential ridership and additional customer base for shops • Area east of San Gabriel Boulevard offers potential for small block "village character" for mixed uses-retail, live/work,

EXHIBIT A

Station	Draft EIS/EIR Station Improvements	Draft EIS/EIR Development Opportunities	SR 60 TOD Report Development Opportunities
		increased access to the area associated with the proposed station, would promote further development in the area. (Id., pp. 45-46.)	office podium courts, and multifamily podium courts • Total potential TOD program – 2.2 million sf, and over 1,400 dwelling units
Santa Anita Avenue Station	An aerial, center platform station would be located on land on the south side of the freeway to the east of Whittier Narrows Recreation Area and Santa Anita Avenue (City of South El Monte). Station facilities would include on-street bus interface, kiss and ride space, and a park and ride structure. (Id., p. 37.)	• An existing pedestrian bridge located at Lexham Avenue/Fawcett Avenue east of the site provides alternative pedestrian access to portions of South El Monte located north of the freeway. • The City of South El Monte has identified the 30-acre site as an ***economic development focus area for regional commercial development opportunities***. • A Joint Powers Authority is planning the first phase of the San Gabriel River Discovery Center on the Whittier Narrows Natural Area, which would replace the existing nature center with a new facility with a gross area of approximately 14,700 square feet, expanded parking, and an outdoor classroom. • Mixed-use development is also being proposed for	• New pedestrian bridge to connect station to the north side of SR 60 • Deep industrial parcels on the north side can be transformed into smaller block increments for walkability, with mixed-use retail and office and a better pedestrian scale • Northwest side of Santa Anita Avenue also has potential for mixed-use development with the adjacent Shively Park amenity • Higher intensities of office and mixed-use could occur at the gateway corner (Santa Anita and Merced/Fawcett) and across street from Civic Center at Central Ave • Existing Army Reserve Center on Lerma Road could be redeveloped into an office park with overlook into Whittier Narrows open space within a 5- to 10-minute walk to the station

EXHIBIT A

Station	Draft EIS/EIR Station Improvements	Draft EIS/EIR Development Opportunities	SR 60 TOD Report Development Opportunities
		retail/commercial uses on an existing nine-acre parcel of land located along Santa Anita Avenue, which is currently a nursery. • Industrial uses north of SR 60 would also provide opportunity for redevelopment in the area. • These developments, along with increased access to the area associated with the proposed station and LRT alignment, would promote further development in the area. (Id., p. 46.)	via the pedestrian bridge. • Existing pedestrian overpass to link South El Monte High School to north side neighborhoods can be relocated to serve both the Gold line alignment and the school • Total potential TOD program – 2.0 million sf, and over 550 dwelling units
Peck Road Station	An aerial, center platform terminus station is also proposed within the freeway ROW, east of Peck Road (South El Monte). Station facilities would include an off-street bus plaza, kiss and ride space, and two park and ride structures. About 0.5 mile to the south, Peck Road connects to an interchange on I-605; therefore, a station at this location could also intercept traffic from communities south via I-605. (Id., p. 37.)	• The site is served by the Metro 270 bus which provides access north to Monrovia and south to Whittier, Santa Fe Springs, and Norwalk. • Peck Road also provides a direct route for a shuttle bus connection to Rio Hondo College which is located just beyond the I-605 Freeway. • Accessibility to this station location and its interface with several bus routes would promote ridership and further	• Area immediately adjacent to the station can become a focal place plaza with retail/office uses as well as a major end-of-line park and ride with added capacity to serve commercial uses • The southwest corner of Durfee and Peck has potential to include an additional park and ride structure (which may be warranted to increase capacity here), with retail on street level edges and multifamily podium courts.

EXHIBIT A

Station	Draft EIS/EIR Station Improvements	Draft EIS/EIR Development Opportunities	SR 60 TOD Report Development Opportunities
		development in the area. • Redevelopment is currently occurring in the area, a two-phased mixed-use project was developed on Peck Road and Michael Hunt Drive, north of SR 60. • Commercial uses located to the north and south of the proposed station location are currently underutilized and could also be redeveloped. (Id., p. 48.)	• Acquisition of a key single-family lot on west side of Peck Road can open access and expand ridership to these north side neighborhoods. • Corners flanking the intersection of Peck and Michael Hunt Road could be variously redeveloped for retail, office, or live/work uses as a transition to the adjacent single-family neighborhood • Total potential TOD program – 570,000 sf, and over 130 dwelling units

October 21, 2014

Laura Cornejo
Project Manager
Metropolitan Transit Authority
One Gateway Plaza, M/S 99-22-6
Los Angeles, CA 90012

RE: REVIEW COMMENTS ON THE EASTSIDE TRANSIT CORRIDOR PHASE 2 DRAFT EIS/EIR
STATE CLEARINGHOUSE NO. 2010011062

Dear Ms. Cornejo:

On behalf of Washington Boulevard Light Rail Transit Coalition, we appreciate this opportunity to review Eastside Transit Corridor Phase 2 Draft EIS/EIR (EIS/EIR). This letter represents the official comments of the Coalition on the Draft EIR/EIS and is focused on the impacts and, more importantly, benefits of this project that most directly affect the cities of Commerce, Pico Rivera, Santa Fe Springs, and Whittier. Brief descriptions of our cities are provided below.

Commerce

The City of Commerce, together with Santa Fe Springs, possesses the greatest concentration of industrial business that would be served by the Washington Boulevard LRT alternative. Commerce and Santa Fe Springs are both major regional employment centers. Commerce's permanent residential population is approximately 14,000, but its daytime workforce population is vastly greater, an estimated 50,000. The City has a robust existing local municipal transit system, with annual ridership of nearly one million, and has indicated its willingness to integrate the planned Washington Boulevard alternative station with this system, to connect and maximize workforce passenger trips throughout the City. The proposed light rail extension along Washington Boulevard would represent a significant opportunity for the City's commuter workforce to augment its transportation options beyond the current freeway commute and limited Metrolink commuter service options.

Pico Rivera

The City of Pico Rivera is nine square miles in area and has a current population of more than 63,700 residents and an estimated daytime population of 82,800. El Rancho Unified School District is the largest employer in Pico Rivera, followed by the Walmart Supercenter, located on Washington Boulevard. The City provides significant employment opportunities strategically located off Washington Boulevard at the Pico Rivera Towne/Business Center, with major businesses such as Walmart, Lowes Home Improvement, Aurora World and the LAUSD Procurement Services Center. The Metrolink Montebello/Commerce Station is located three miles from Pico Rivera and is not easily accessible by public transit.

Santa Fe Springs

The City of Santa Fe Springs is 8.7 miles in area, with a current population of 16,767. During the daytime, the population increases by an estimated 41,442 (more than 250%), with 1,142 residents working and living in Santa Fe Springs. Vons supermarket chain and McMaster-Carr (commercial/industrial parts supplier) are the largest employers in Santa Fe Springs, and the Santa Fe Springs Mall Shopping Center is located on Washington Boulevard. The nearest Metrolink station, the Montebello/Commerce station, is approximately five miles away from Santa Fe Springs.

Whittier

The City of Whittier is 14.8 square miles in area, with a current population of 86,177. During the daytime, the population decreases by 4,989 due to commuting, and 7,443 residents work and live in Whittier. The recently expanded PIH Health is the largest employer in Whittier, and it is located across from the Home Depot Center, a major job and retail center along Washington Boulevard. Whittier is also home to the prestigious Whittier College, founded in 1887, the fourth largest employer in the City and attended by 1,765 students. Whittier has no municipal transit system; it is served by Norwalk Transit, Montebello Bus Lines, Metro, and to some extent by the County "Sunshine Shuttle" and Foothill Transit.

The Washington Boulevard Light Rail Transit Coalition sincerely appreciates and applauds the effort by Metro and the FTA to bring to fruition this important expansion of the growing light rail system in the Los Angeles metropolitan area. We strongly support the underlying purpose of the project, to "provide area residents, businesses, and transit-dependent populations with a transit alternative connecting them to the Metro Gold Line Eastside Extension and the regional rail system".

This comment letter incorporates the most critical concerns and questions about the two build alternatives, SR 60 and Washington Boulevard, shared by the elected and appointed representatives of the four member cities of the Washington Boulevard Light Rail Transit Coalition, and reiterates concerns we have expressed in previous letters to Metro during Draft EIS/EIR preparation. These comments are submitted on behalf of the residents of our four cities, particularly our transit-dependent, low-income, and minority residents, as well as those who commute to and from our cities for work. We believe those most affected by the project should play an integral role in the environmental review process.

Toward that end, we object to the short, eight-week review period provided for public review and comment on the massive Draft EIS/EIR, with a mere three weeks between Metro's public hearings and the close of the comment period. This did not allow sufficient time for the cities to inform residents about the project or adequately solicit their input, or for residents to review the documentation themselves. We note that Metro received approximately 800 comment letters and 2,000 unique comments on its proposed Westside Subway extension (the "Purple Line") during a similarly brief comment period in 2010, and selected its Locally Preferred Alternative just 10 days after the close of the comment period; how can such a rushed selection process possibly give public comments due consideration?

The Coalition has serious concerns about the limited degree to which the Draft EIS/EIR addresses key community considerations affecting our cities, and about the methodologies used to evaluate certain impacts and benefits and to compare the SR 60 and Washington Boulevard LRT alternatives. Our primary concerns follow:

- **The Draft EIS/EIR relies on flawed methodologies and incomplete analysis of key impacts and benefits.** In particular, analysis is flawed or incomplete with respect to the determination of SR 60 alternative impacts on major infrastructure such as Whittier Narrows Dam and Southern California Edison transmission towers and ROW, the costs of each alternative's construction and operation, provision of access to transit, service to underserved populations, opportunities for transit-oriented development opportunities and community revitalization, and ridership assumptions and projections.

- **The Draft EIS/EIR does not quantitatively evaluate and rank the abilities of the alternatives to meet key project objectives.** The Draft EIS/EIR's evaluation of alternatives generally overemphasizes the importance of impacts, underemphasizes or ignores altogether the associated benefits, and makes no attempt to quantify or rank the degree to which each alternative would achieve the project objectives that are the reason for proposing the Eastside Transit Corridor in the first place. This

misplaced emphasis results in a simplistic, profoundly skewed comparison and conclusion, whereby the SR 60 alternative is inexplicably identified as environmentally superior almost entirely on the basis of comparative impacts, despite its failure to achieve any of the project objectives to the extent that the Washington Boulevard alternative would. As a result, the all-important tradeoffs between impacts and benefits are not disclosed to the public or even considered in alternatives evaluation.

- **MTA and the FTA should select the Washington Boulevard alternative as the Locally Preferred Alternative and further evaluate our suggested alternative alignment for a segment of this alternative.** In light of our concerns, and the supporting comments and findings presented in our comment letter and attachments, the Washington Boulevard Light Rail Transit Coalition formally requests that Metro and its partner agencies select the Washington Boulevard alternative as the Locally Preferred Alternative. We believe the Washington Boulevard alternative, **including consideration of Atlantic Boulevard as an alternative to the proposed aerial Garfield Avenue segment**, merits further detailed analysis and a more rigorous, quantitative, and transparent ranking of its benefits and abilities to meet the project objectives. We note, when Metro encountered a problem with the SR 60 alternative alignment, staff studied an alternate alignment around the landfill, having the tracks cross the SR 60 to the south side of the freeway and then return ½ mile later to the north side of the freeway.

The Washington Boulevard Light Rail Transit Coalition has retained consultants to conduct a focused technical review of the Draft EIS/EIR, including environmental consulting firm PCR Services Corporation, which employs planners, air quality scientists, and biologists, and socioeconomic consultants HR&A Advisors. Our comments are based on this technical review as well as our members' understanding of the needs of the Gateway Cities most directly affected by this project, and our previous correspondence and discussions with Metro. Comments are presented below and correspond to specific chapters in the EIS/EIR. A technical memorandum prepared by HR&A Advisors, which addresses the Draft EIS/EIR's economic and community benefits analysis, is provided as Attachment 1 to this letter, and we request that Metro review and respond to its contents.

Following are the Coalition's specific comments concerning the two proposed build alternatives.

CHAPTER 1 – PURPOSE AND NEED

The Draft EIS/EIR fails to adequately analyze the extent to which the proposed build alternatives achieve three of the project's most important objectives. As stated at the beginning of the EIS/EIR Project Purpose and Need chapter (p. ES-3), "The purpose of the Eastside Transit Corridor Phase 2 Project is to provide area residents, businesses, and transit-dependent populations with a transit alternative connecting them to the Metro Gold Line Eastside Extension and the regional rail system."

Three of the four objectives intended to achieve that purpose are as follows:

- Serve the large number of transit-dependent and low-income populations in the project area;
- Increase access to major employment centers, activity centers, and destinations in the project area and Los Angeles County; and
- Provide transit alternatives to alleviate roadway congestion, improve mobility options for enhanced quality of life, and provide a convenient and reliable alternative to the automobile.

Based on review of the EIS/EIR's Economic and Fiscal Impacts, Land Use and Development, and Community & Neighborhood Impacts sections, we believe that 1) analysis of the two build alternatives is incomplete in its assessment of these impacts, 2) these impacts are not reflected in the final evaluation of alternatives, and 3) for these reasons, the EIS/EIR fails to adequately analyze the extent to which the two alternatives achieve these objectives. *See Attachment 1, HR&A Advisors Technical Memorandum (p. 2), for further comment on and analysis of this issue.*

Light rail transit is not regional rail and the SR 60 alternative functions more as the regional rail since ridership appears to rely on drawing SR 60 freeway commuters, and potentially commuters into Los Angeles from Riverside, which is not an appropriate use of Los Angeles County tax dollars. We reiterate a key point made in our January 31, 2014 letter to Metro at the start of environmental review, and now borne out by review of the Draft EIS/EIR: two of the project objectives are "Provide regional transit connectivity with the Metro Gold Line Eastside Extension and Measure R projects" and (in part) "Provide transit alternatives to alleviate roadway congestion [and] improve for enhanced quality of life". The Washington Boulevard alternative is true light rail, weaving accessible transit – including more stations – through dense municipal population and

employment centers, where people live and work. It also terminates at a point where light rail system expansion to the south is possible, even likely, in light of Gateway Cities discussions with OCTA staff and the existence of abandoned and excess heavy rail ROW for use as possible light rail corridors. For these reasons, the Washington Boulevard alternative much more effectively connects Gateway Cities to the regional light rail system and other Measure R projects. It also integrates more effectively with existing regional and local municipal bus systems, and, eventually, with the bicycle routes identified in the Gateway Cities transportation plan. **Based on these criteria, the Washington Boulevard alternative more effectively achieves these two project objectives.**

CHAPTER 3 – TRANSPORTATION IMPACTS AND MITIGATION

The SR 60 alternative is much more auto-dependent than the Washington Boulevard alternative since ridership appears to rely on drawing commuters from SR 60 more than from surrounding communities, and also duplicates Metrolink's function as regional commuter rail since it would serve commuters from the east (i.e., San Bernardino and Riverside Counties). Light rail transit is intended to serve local communities, with frequent service and stops. The Draft EIS/EIR does not disclose the percentage of its projected ridership that would arrive at the eastern terminus of the SR 60 alignment from the east (i.e., from San Bernardino and Riverside Counties via the SR 60), and therefore the degree to which the SR 60 alternative serves Inland Empire commuters, as opposed to the populations of the communities that the alignment would actually traverse, is unknown. This information has apparently been collected by Metro and has been requested by the Gateway Cities, but has not been forthcoming, and is key to comparing the two build alternatives in terms of achievement of project objectives.

The Draft EIS/EIR does not address the ongoing study of carpool lane connector ramps at the SR-60 and I-605/I-10 interchange, jointly undertaken by the Gateway Cities and San Gabriel Valley Council of Government, Caltrans, and MTA. If implemented, the new carpool lane connector ramps could reduce boardings and thus ridership at the eastern terminus of the SR 60 alignment. Moreover, infrastructure associated with new ramps could affect the proposed alignment of the SR-60 alternative, and vice versa, potentially rendering the LRT alignment or the ramps infeasible or increasing costs. **The carpool lane connector ramp study should be considered and further analysis of the SR 60 alternative undertaken to determine impacts and feasibility.**

SECTION 4.2 – LAND USE AND DEVELOPMENT

Transit-oriented development around the country has demonstrated that transit infrastructure can increase property values and accelerate the pace of new development, create construction and permanent jobs, and increase tax revenues to

cities as the result of this increased economic activity. **Development opportunities, especially TOD, are significantly greater for the Washington Boulevard alternative than for the SR 60 alternative.** However, the Draft EIS/EIR does not reflect these important considerations in its Economic and Fiscal Impact Analysis or Evaluation of Alternatives.

There is a higher likelihood of rezoning land for redevelopment by local cities along the Washington Boulevard alignment, but the Draft EIS/EIR does not consider this in its comparison of the build alternatives. Conservatively, the Draft EIS/EIR assumes no rezoning of land in the areas surrounding the stations in its assessment of growth (development) opportunities, which ignores land use trends around other transit corridors and stations in Los Angeles County. Moreover, the Draft EIS/EIR's Section 4.17, Growth Inducing Impacts, contradicts that very assumption when it cites revitalization initiatives in Commerce and Montebello, and the Whittier General Plan's encouragement of development around transportation nodes and corridors as "making [the Washington Boulevard alternative] a more transit-friendly corridor than the SR 60 alignment from a policy perspective". Even absent such policies to encourage more density in proximity to the proposed alignment, the Washington Boulevard alternative is preferable in terms of development and redevelopment (and therefore revitalization) possibilities. **As a result of the flawed, selective methodology used for this analysis, the sizes of the populations, households, and employment centers that would be served by the Washington Boulevard alternative, as well as future ridership projections along this alignment, are considerably understated. This was not considered in the Evaluation of Alternatives.** *See Attachment 1, HR&A Advisors Technical Memorandum (p. 4), for further comment on and analysis of this issue.*

There is much greater potential for Transit-Oriented Development along the Washington Boulevard alternative corridor and in the station areas. The Draft EIS/EIR analysis indicates that the Washington Boulevard alternative is better oriented toward transit users – **and toward encouraging more transit use in the future**. **The Draft EIS/EIR states of the Washington Boulevard alternative, "the proximity of rail stations would encourage uses that are not auto-dependent and not as likely to induce auto trips ...which is consistent with regional and local environmental goals." This is a profoundly important advantage of the Washington Boulevard alternative** and a major differentiator that is neither disclosed nor taken into consideration in the Evaluation of Alternatives in terms of their abilities to meet the project objective related to mobility: "Provide transit alternatives to alleviate roadway congestion, improve mobility options for enhanced quality of life, and provide a convenient and reliable alternative to the automobile.

The SR 60 alternative provides fewer opportunities for development, transit-oriented or otherwise, because of proximity to the freeway corridor, the paucity of developable land, and the need for large park and ride lots to accommodate the projected automobile-oriented ridership. *See Attachment 1, HR&A Advisors Technical Memorandum (p. 2), for further comment on and analysis of this issue.*

Many of the land uses along the SR 60 alternative alignment and in the station areas present inherent conflicts with new development or rezoning. Large segments of the SR 60 alignment traverse public lands and open space (Whittier Narrows Dam Flood Control Basin, including the Whittier Narrows Dam Recreation Area, Legg Lake, and Emerald Necklace parks and trails surrounding the Rio Hondo and San Gabriel River) and Superfund sites (the North and South Parcels of the 190-acre former liquid hazardous waste OII Landfill, currently undergoing remediation, and the San Gabriel Valley South El Monte and Whittier Narrows Operable Units, underlain by volatile organic compound-impacted groundwater), and the alignment terminates at a school in South El Monte. These lands are either unavailable for development or unlikely to be rezoned to accommodate new development; **the Draft EIS/EIR concludes that there are limited redevelopment opportunities at three of the four proposed stations along the SR 60 alignment, and mitigation measures proposed to address impacts on affected resources such as flood control capacity will not alleviate the essential incompatibility of existing land uses with new development along the SR 60 alignment.** These serious limitations are not taken into consideration in the Evaluation of Alternatives in terms of their comparative abilities to meet project objectives. *See Attachment 1, HR&A Advisors Technical Memorandum (p. 5), for further comment on and analysis of this issue.*

The Washington Boulevard alternative provides substantially more development opportunities in proximity to stations. The entirety of the Washington Boulevard alignment passes through urban areas with high potential for redevelopment now and in the event of future rezoning, including vacant parcels, underutilized parcels, surface parking lots, and the proposed six stations compared to the SR 60 alignment's four stations would also facilitate more potential revitalization – again, even under current zoning. **It is entirely reasonable to assume that development opportunities surrounding the Washington Boulevard alternative's stations would lead to revitalization and beneficial economic outcomes for the cities along that alignment, and the Draft EIS/EIR should have acknowledged this in its economic evaluation and comparison of alternatives.** Because of this, the Washington Boulevard alternative better achieves the project objectives related to serving transit-dependent and low-income populations and increasing access to employment and activity centers. *See Attachment 1, HR&A Advisors Technical Memorandum (p. 6), for further comment on and analysis of this issue.*

SECTION 4.4 – ECONOMIC AND FISCAL IMPACTS

The Draft EIS/EIR calculations used to estimate the economic and fiscal impacts of these build alternatives do not present a full picture of the economic impacts that would result from the introduction of this important new transit line for reasons stated below.

Future development and redevelopment benefits are not accounted for in the analysis of economic and fiscal impacts. The Draft EIS/EIR concluded that the Washington Boulevard LRT alternative would result in greater development potential because it would traverse, rather than skirt, five cities, but makes no attempt to quantify property, sales, and other local tax revenues associated with new development. As a result, the economic and fiscal (i.e., local government) benefits that would result from the Washington Boulevard LRT alternative are significantly understated. *See Attachment 1, HR&A Advisors Technical Memorandum (p. 2), for further comment on and analysis of this issue.*

Potential job creation and earnings were not calculated for the Cities most directly and profoundly affected by the proposed build alternatives. The earnings and employment impacts of the proposed alternatives were assessed in the Draft EIS/EIR, but only at the regional and subregional scales – for Los Angeles County and the Los Angeles Metropolitan Statistical Area – and not for the Cities most profoundly and directly affected. As a result, the two build alternatives are falsely characterized as equivalent under this metric, which masks important differences that should have been considered in the comparison of alternatives. *See Attachment 1, HR&A Advisors Technical Memorandum (pp. 2-3), for further comment on and analysis of this issue.*

The difference in transit-related time savings between the two build alternatives is overstated and unsupported by evidence. The Draft EIS/EIR's Appendix AA, Economic and Fiscal Impacts Technical Memorandum, compares the alternatives in terms of travel time savings, or the monetary value of time saved because of the availability of transit, determined that the SR 60 alternative would result in "modestly greater" value (just 3%) than the Washington Boulevard alternative in the year 2035. The Draft EIS/EIR's travel demand forecast (which identifies, among other variables, the assumed points of origin for projected ridership) does not indicate a margin of error, so the accuracy of the 3% difference is unsubstantiated. **It is inappropriate for the Draft EIS/EIR to conclude that the SR 60 alignment is the environmentally superior alternative, based on such a minor difference and without evidence supporting its validity, especially when this would occur 21 years in the future.** *See Attachment 1, HR&A Advisors Technical Memorandum (p. 3), for further comment on and analysis of this issue.*

The comparative costs of parking for the two build alternatives were not evaluated. Because of the location of the SR 60 alignment and the smaller number of stations, the SR 60 alternative would require construction of almost twice as many parking spaces per station as the Washington Boulevard alternative. **Metro would bear the considerable cost of construction and operation of the increased number of parking spaces associated with the SR 60 alternative, a fact that is not disclosed or considered in the Evaluation of Alternatives**.

Moreover, the size of the parking lots required for the SR 60 alternative would reduce the already severely limited amount of developable land in proximity to the stations. Since the majority of the ridership along this alignment would have to arrive at the stations by automobile, any nearby redevelopment projects would likewise be required to build substantial, and expensive, parking to accommodate the automobile-oriented ridership. **By contrast, the Washington Boulevard alternative would allow many more riders to arrive on foot or by bicycle, more effectively serving the transit-dependent population of the cities served and achieving this important project objective in Chapter 1. This disparity in the abilities of the two build alternatives to achieve this objective is not disclosed or considered in the Evaluation of Alternatives.** *See Attachment 1, HR&A Advisors Technical Memorandum (p. 3), for further comment on and analysis of this issue.*

SECTION 4.5 – COMMUNITY AND NEIGHBORHOOD IMPACTS

The Draft EIS/EIR does not quantify or compare accessibility benefits that would accrue to low-income, transit-dependent communities. Studies have shown that people are more likely to use transit when they live or work within a ¼-mile to ½-mile radius of transit stations. Based on review of the Environmental Justice Memorandum in Appendix DD of the Draft EIS/EIR, a comparison of the populations, households, and jobs within a ½-mile radius of the SR 60 and Washington Boulevard station reveals that **the Washington Boulevard stations would serve a far larger concentration of each. Specifically, the Washington Boulevard alternative stations would serve 49,282 more people, 98 percent more than the SR 60 stations; 12,955 or 86% more households; and 7,724 or 69 percent more jobs. This constitutes an astounding difference between the ability of the two alternatives to serve transit needs.** Analysis of these concentrations within ½ mile of the rail corridors, as opposed to the stations, shows nearly as a great differential, with the Washington Boulevard alignment passing through areas supporting a 72% larger population, 61% larger number of households, and 68% larger concentration of jobs. **None of this is disclosed or considered in the Draft EIR's Evaluation of Alternative, and specifically within Table 6-3, Alternatives Evaluation Results.** *See Attachment 1, HR&A Advisors Technical Memorandum (p. 8), for further comment on and analysis of this issue.*

SECTION 4.7 – AIR QUALITY

The Washington Boulevard Alignment is in greater alignment with Southern California Association of Governments' (SCAG's) goals to advance Southern California's mobility, economy, and sustainability, as outlined in the 2012 RTP/SCS. To achieve this three-pronged vision, "The SCS focuses the majority of new housing and job growth in high-quality transit areas and other opportunity areas in **existing main streets, downtowns, and commercial corridors**, resulting in an improved jobs-housing balance and more opportunity for transit-oriented development [emphasis added]".[1] For much of its length through our cities, Washington Boulevard serves as an essential commercial corridor, serving as primary access to existing shopping, entertainment, health care, and professional services, whereas large stretches of the land immediately adjacent to the SR-60 is devoid of residential or commercial development and lacking in sites suitable for future TOD development. As described above, the Washington Boulevard Alternative would encourage revitalization and development of improved commercial and residential opportunities in close proximity to the six proposed Gold Line stations along the alignment. For these reasons, the Washington Boulevard alternative, and our requested Atlantic Boulevard variation, would bring high-quality transit to existing employment, entertainment, and commercial uses and encourage future residential and commercial development, and is therefore more in line with SCAG's vision of improving mobility and sustainability.

The Washington Boulevard Alignment alternative represents smart growth, which is a recognized effective strategy to reducing air emissions from transit. One of SCAG's five governing policies in developing the RTP/SCS is "land use and growth strategies in the RTP/SCS will respect local input and advance smart growth initiatives".[2] The United States EPA has developed 10 principles of smart growth, and recommends land use and transportation planning decisions that aim to:[3]

1. Mix land uses
2. Take advantage of compact building design
3. Create a range of housing opportunities and choices
4. Create walkable neighborhoods
5. Foster distinctive, attractive communities with a strong sense of place
6. Preserve open space, farmland, natural beauty, and critical environmental areas
7. Strengthen and direct development towards existing communities
8. Provide a variety of transportation choices

[1] http://rtpscs.scag.ca.gov/Documents/2012/final/2012fRTP_ExecSummary.pdf, page 8
[2] http://rtpscs.scag.ca.gov/Documents/2012/final/f2012RTPSCS.pdf, page 15
[3] http://www.epa.gov/smartgrowth/about_sg.htm#principles, accessed October 20, 2014

9. Make development decisions predictable, fair, and cost effective
10. Encourage community and stakeholder collaboration in development decisions

The Washington Boulevard alternative **strengthens and directs development towards existing communities (#7),** whereas the SR-60 alternative directs development towards commuter routes. By placing stations in close proximity to residential and commercial neighborhoods, the Washington Boulevard alternative will take advantage of and **create walkable neighborhoods (#4),** whereas the SR-60 alternative will place stations outside of the walking range of a typical user. In addition, the Washington Boulevard alternative will **preserve open space and critical environmental areas (#6)**, whereas the SR-60 alternative infringes upon open space and wildlife habitat.

The California Air Pollution Control Officers Association (CAPCOA) has quantified the benefit (reduction in air emission) resulting from smart growth principles. By encouraging locating development in close proximity to transit, CAPCOA states TOD "...will facilitate the use of transit…" and "...results in a mode shift and therefore reduced [Vehicle Miles Traveled]."[4] According to their guidance, CAPCOA estimates a reduction of up to 24.6 percent in VMT and the resultant GHG emissions can be achieved by encouraging smart growth.

SCAG also credits smart growth principals for its role in reducing air quality impacts from regional transportation emissions, and states "This RTP/SCS successfully achieves and exceeds our greenhouse gas emission-reduction targets set by ARB … This RTP/SCS also meets criteria pollutant emission budgets set by the EPA...This air quality benefit is made possibly largely by more sustainable planning, integrating transportation and land-use decisions to allow Southern Californians to live closer to where they work and play, and to high-quality transit service."[5] **By bringing light rail to highly urbanized, densely populated areas, the Washington Boulevard alternative better achieves smart growth principles, which will result in greater reductions in air pollutant and GHG emissions than the SR-60 alignment.**

The Washington Boulevard Alignment Alternative directs growth to areas more suitable for residential land use, by encouraging future TOD outside the local influence of harmful air pollutant emissions associated with major transportation corridors with substantial diesel-engine use. As stated above, CAPCOA guidance can be used to quantify the reduction in air pollutant and GHG emissions from locating high quality transit in close proximity to residential and

[4] California Air Pollution Control Officers Association, Quantifying Greenhouse Gas Mitigation Measures, Land Use Transportation (LUT) Measure 5, pp. 171-175, August 2010.
[5] Ibid, page 9

mixed-use development. CAPCOA acknowledges such benefits decrease sharply when the distance that separates residents and transit options increases.[6] The proposed stations under the SR 60 alternative would locate stations in areas with low levels of residential and commercial density. For instance, under the SR-60 alternative, the proposed stations located near Paramount Boulevard-San Gabriel Boulevard, Santa Anita Avenue, and Peck Road would be in areas with very low density to the south due to the presence of open space and park uses. There are little to no residential uses directly to the south of these proposed station locations, which results in a lost opportunity to capture additional ridership. In contrast, stations along the Washington Boulevard alternative are within densely populated areas, many adjacent to existing residential neighborhoods and commercial developments on all sides. As a result, the stations along the Washington Boulevard alternative would realize greater foot traffic and increased ridership.

Future development of residential uses in close proximity to the stations along the SR-60 alternative would be incompatible with residential land use siting guidelines drafted by the State of California. According to the ARB, "Recent air pollution studies have shown an association between respiratory and other non-cancer health effects and proximity to high traffic roadways. Other studies have shown that diesel exhaust and other cancer-causing chemicals emitted from cars and trucks are responsible for much of the overall cancer risk from airborne toxics in California." Therefore, ARB recommends residential uses should be placed at least 500 feet or more from a freeway or urban roads carrying 100,000 vehicles/day.[7] According to the most recent available data from the California Department of Transportation (Caltrans), within the study area of the EIR, the SR 60 carries approximately 250,000 vehicles per day. Caltrans also estimates approximately 6-7% of these vehicles are trucks, the overwhelming majority of which, according to ARB models, are powered by diesel fuel. Diesel-powered trucks emit particulate matter at substantially high rates, and diesel particulate matter is considered a carcinogenic toxic air contaminant by the State of California and has been proved harmful to the human respiratory system and known to cause or contribute to respiratory infections, and the number and severity of asthma attacks. For these reasons, it is inappropriate to encourage TOD development along the SR-60 alignment within close proximity to a highway with substantial numbers of daily diesel-powered truck traffic.

ARB states, "We believe that with careful evaluation, infill development, mixed use, higher density, transit-oriented development, and other concepts that benefit regional air quality can be compatible with protecting the health of individuals at the neighborhood level".[8] We believe that careful evaluation will demonstrate that

[6] Ibid
[7] http://www.arb.ca.gov/ch/landuse.htm
[8] Ibid, page ES-2

the Washington Boulevard alternative can safely encourage TOD development within closer proximity to proposed stations outside the influence of local sources of harmful air pollutants from the region's major trucking routes. This analysis seems to be missing from the Draft EIS/EIR.

SECTION 4.12 – WATER RESOURCES

The determination of impacts on an open channel west of Greenwood Avenue is unsubstantiated and may constitute improper deferral of analysis. The Draft EIS/EIR, in Section 4.12, Water Resources, states of the SR 60 alternative alignment, "the v-ditch located directly west of Greenwood Avenue is the only drainage that would have to be relocated for construction." This discussion does not confirm that drainage is not jurisdictional (i.e., wetlands or "other waters" of the United States under the jurisdiction of a state or federal agency), yet says later that there would be no impacts on this drainage under CEQA or NEPA. **This determination is unsubstantiated and constitutes deferral, and thus possible understatement, of impacts on this drainage, should the agencies with jurisdiction over this resource disagree.**

The Draft EIS/EIR Project Description states vaguely that portions of a number of storm drains and "drainage features" will be impacted, but does not acknowledge – and nor does Section 2.12, Water Resources, that even open concrete channels are often regulated as Federal and/or State waters, triggering the possible need for regulatory permits. Consequently, the related impact determinations are unsubstantiated and impacts on these resources may be understated and associated analysis improperly deferred.

Section 4.17, Water Resources, of the Draft EIS/EIR states of the SR 60 alternative that all construction impacts are solely from abutments over river "above OHWM" (Ordinary High Water Mark) but offers no basis for this conclusion and does not indicate that its identification of the OHWM is based on formal concurrence from the USACE. Moreover, there is no discussion of temporary impacts that could occur within US Army Corps-regulated within the OHWM. These conclusions are therefore unsubstantiated and constitute improper deferral of analysis and possible mitigation.

Dewatering impacts appear to be understated and analysis improperly deferred. Section 4.17, Water Resources, of the Draft EIS/EIR states that there could be dewatering required during construction of the SR 60 alternative, and further states that that could be covered through compliance with Storm Water Pollution Prevention Plan (SWPPP) regulations and LARWQCB Municipal National Pollutant Discharge Elimination System (NPDES) and Municipal Separate Storm Sewer System (MS4) permit requirements, but this is an oversimplification of the

potential impacts. In fact, a RWQCB dewatering permit could be required, unless dewatering needs can be shown to meet the appropriate thresholds for the region, and construction impacts would likely require adequate mitigation with a proper baseline/project testing and treatment program.

Section 4.17, Water Resources, of the Draft EIS/EIR, claims there is no practicable alternative to locating the proposed Santa Anita Station and parking lot within the selected location within the flood control basin. However, there is no mention of an alternative station and parking lot location outside of the flood control basin, **and therefore the dismissal of a practicable alternative to the selected location appears to be unsubstantiated and may constitute the deferral of analysis**. If some other location was previously evaluated, such as during the AA project phase, that should be noted herein, but absent that, this conclusion is unsubstantiated.

Mitigation 4.12-I in Section 4.17, Water Resources, is a complete deferral of mitigation to an unknown future technical analysis and evaluation for compliance with Regulation 1000-2-1 (this should properly be cited as Regulation 1110-2-1) and Policy Guidance Letter No. 32. There is insufficient detail in the EIR/EIS to conclude whether or not the mitigation measure could reduce the impact of construction within the floodplain to a less than significant level.

Section 4.17, Water Resources, does not mention how many structures would be placed within the Whittier Narrows Flood Control Basin, nor does it provide any description or even a conceptual site plan indicating where the structures will be placed. Section 4.17 states that the Santa Anita Station will be elevated and will displace flood storage capacity, but there is no mention of whether the park and ride lot will also be elevated (it is mentioned only in Mitigation Measure 4.12-ii), nor does the Draft EIS/EIR discuss how riders would drive to the station, which would necessarily also be within the Flood Control Basin. Mitigation Measure (4.12-ii) also defers the discussion of where, or even how, the project would replace the loss of 83 cubic yards of flood storage capacity. Although we recognize that plans remain conceptual for both LRT alignments in the Draft EIS/EIR, it is irresponsible, and inaccurate, to base the determination of impacts, and more importantly, the comparison of alternatives and selection of an environmentally superior alternative, on such cursory analysis, unsubstantiated conclusions, and lack of mitigation. **It is entirely possible, even likely, that these constitute adverse and potentially unavoidable significant impacts for SR 60 alternative. Please refer to our comment on page 4 regarding redesign of the SR-60 alignment to avoid the landfill.**

We request that Metro consider Atlantic Boulevard as a possible alternative alignment to, or variation on, Garfield Avenue for the Washington Boulevard alternative as it turns south from the SR 60 right-of-way. The segment of

Garfield Avenue between Via Campo, immediately south of SR 60, and Washington Boulevard, much of which is within the City of Montebello, is underlain by a major underground storm drain (DDI 0023, Garfield Lateral) which is owned and operated by the Los Angeles County Flood Control District and conveys runoff from the surrounding areas in Montebello as well as upstream areas. The construction of an aerial LRT structure may require substantial reinforcement or relocation of this infrastructure, which is not explicitly disclosed in the EIS/EIR, and the presence of this infrastructure may preclude or make cost-prohibitive a subway alignment for this segment, which could avoid the significant adverse visual character, shade/shadow, social/physical character and community resource, and intersection impacts of an aerial structure on the neighborhoods lining Garfield Avenue. In contrast to the predominantly residential character of much of the proposed Garfield Avenue alignment, particularly inside Montebello City limits, Atlantic Boulevard is predominantly lined with commercial uses and does not appear to be underlain by a major storm drain requiring relocation or precluding an aerial or subterranean structure. **Given that a disproportionate number of the unavoidable significant adverse impacts associated with the Washington Boulevard alternative as a whole are associated with this Garfield Avenue segment, it seems imperative that Metro consider alternatives to this segment. We therefore request that an aerial or subterranean LTRT alignment be considered as an alternative to or variation of the Garfield Avenue segment of the Washington Boulevard alignment.**

SECTION 4.17 – PARKLANDS AND OTHER COMMUNITY FACILITIES

The Draft EIS/EIR does not discuss the Emerald Necklace Forest to Ocean Expanded Vision Plan, and the SR 60 LRT Alternative may impede connectivity of the planned greenway network through Los Angeles County. The Emerald Necklace Vision Plan was first introduced in 2005 to outline the strategy for development of a 17-mile system of parks and green-ways interconnecting the cities along the Rio Hondo and San Gabriel Rivers watershed areas in eastern Los Angeles County. This plan was expanded in 2008 to include the Emerald Accord, which was supported by the 62-member Emerald Coalition, including the Los Angeles County Board of Supervisors, the Cities of Whittier and Pico Rivera, El Rancho Unified School District, the State Rivers and Mountains Conservancy, the Sierra Club and others as member agencies/signatories. The Emerald Accord pledges its signatories to work collaboratively to preserve and restore the Los Angeles and San Gabriel watersheds and their rivers and tributaries for recreational open space, native habitat restoration, conservation and education.

When complete, the Emerald Necklace Regional Park Network will unify a vast region of Southern California, from the desert through the San Gabriel Mountains to the Pacific Ocean, by linking more than 1,500 acres of parks and open spaces along an interconnected greenway around Rio Hondo, San Gabriel and the lower Los

Angeles Rivers. In Table 4.19-1 of Section 4.17, Parklands and Other Community Facilities, within the Draft EIS/EIR, the Emerald Necklace was included as a future development project in the vicinity of the SR 60 alternative; however, there was no discussion provided regarding potential impacts of the SR 60 alternative on the Emerald Necklace in Section 4.15 of the Draft EIS/EIR. The Emerald Necklace was also not listed as a related future project for the Washington Boulevard LRT Alternative. **In consideration of the pledge made by the Emerald Accord signatories, and the potential impacts of the SR 60 LRT Alternative on this planned regional recreational amenity, a discussion of potential effects upon this important greenway network must be discussed and disclosed in the Draft EIS/EIR.**

SECTION 4.18 – ENVIRONMENTAL JUSTICE

The fact that the Draft EIS/EIR does not quantify accessibility benefits to low-income, transit-dependent communities disadvantages those most in need of transit opportunities, including the unemployed population, along the Washington Boulevard alignment. The fact that the Washington Boulevard alignment would serve a larger population in the proximity of the rail corridor and stations means this alternative would much more effectively achieve the project objectives to "Serve the large number of transit-dependent and low-income populations in the project area" and "Provide transit alternatives to alleviate roadway congestion, improve mobility options for enhanced quality of life, and provide a convenient and reliable alternative to the automobile." This is not disclosed or considered in the EIR's Evaluation of Alternatives.

Moreover, the Draft EIS/EIR states that the Washington Boulevard alignment would pass through areas with an estimated unemployed population of 6,834 versus 3,571 for the SR 60 alternative, a 52% greater population, and the Washington Boulevard stations would serve 4,246 unemployed persons compared to 1,965 for the SR 60 stations, a 46 percent increase. **These statistics are not taken into consideration in the Evaluation of Alternatives, which simplistically ranks the two alternatives as equivalent ("Yes") in terms of their respective abilities to achieve the two project objectives that address service to transit-dependent and low-income populations and improved mobility options for enhanced quality of life. The treatment of the two alternatives as equivalent in their achievement of these project objectives is not supported by the evidence in the Draft EIS/EIR's own data and analysis. For this reason, it is an inappropriate basis for selection of the environmentally superior alternative, which does a serious disservice to the disadvantaged populations of the surrounding communities.**

Finally, the physical accessibility of the stations to pedestrians and those approaching by bicycle affects the ability of transit-dependent populations to take

advantage of light rail. Appendix P of the Draft EIS/EIR, the Community and Neighborhood Impacts Technical Memorandum, acknowledges the difficulties inherent in freeway-adjacent stations, stating, "…freeway-adjacent stations are not ideal for community access and connectivity due to the automobile-oriented nature of freeway facilities," and "Stations along major commercial streets, such as most of the proposed stations for the Washington Blvd LRT Alternative, would provide greater community mobility benefits." **But these important facts about the superiority of the Washington Boulevard alignment in terms of service to low-income, transit dependent populations – critical facts for the cities of Montebello, Commerce, Whittier, Pico Rivera, and Santa Fe Springs – are buried in this technical appendix and not even mentioned in the Draft EIS/EIR section, much less taken into consideration in the Evaluation of Alternatives.**

See Attachment 1, HR&A Advisors Technical Memorandum (pp. 8-9), for further comment on and analysis of this issue.

CHAPTER 6 – EVALUATION OF ALTERNATIVES

Two of Metro's stated policy objectives for the project are "enhancing service to transit-dependent/low income communities" and "increase access to activity and employment centers," but the Draft EIS/EIR alternatives analysis does not compare how well each alternative meets these objectives. Instead, the Draft EIS/EIR inappropriately limits its consideration of the affected communities and neighborhoods solely in terms of *negative* impacts relating to construction and operation, which are not the only criteria under NEPA or CEQA for the comparative evaluation of alternatives or selection of an environmentally superior alternative. *See Attachment 1, HR&A Advisors Technical Memorandum (p. 8), for further comment on and analysis of this issue.*

** **The Evaluation of Alternatives overemphasizes the importance of adverse impacts of the two build alternatives, underemphasizes community and regional benefits, and all but ignores the comparative abilities of the two alternatives to meet project objectives.** ** The Draft EIS/EIR, particularly in the Evaluation of Alternatives, demonstrates a consistent tendency to judge the alternatives based almost entirely on their comparative adverse impacts, with surprisingly and inappropriately little consideration given to their comparative abilities to meet critical project objectives that serve the very project purpose and need that are the reason for this important project in the first place. In fact, many of the impacts determined for the Washington Boulevard alternative are related to construction, and those as well as most operational impacts are mitigable, an important fact not considered in the evaluation of alternatives. **While the Washington Boulevard alternative was determined to result in some unavoidable significant impacts, as is expected in a heavily urbanized setting versus the SR 60 alternative's freeway-running alignment, the corresponding**

benefits of the Washington Boulevard alternative are not weighed against its impacts. **Likewise, the absence of unavoidable significant impacts for the SR 60 alternative is not balanced by disclosure that it falls far short of the Washington Boulevard alternative's ability to achieve all of the project objectives**.

As a result, the affected cities and users of transit are denied the opportunity to evaluate the tradeoffs between the two alternatives' impacts and benefits, which is essential to any environmental review process, but is particularly critical when the action being evaluated represents a major public works project. By nature, such projects are disruptive of the environment, sometimes on a large scale, during construction and in some instances permanently. But such projects are also meant to confer major benefits for large numbers of users over long durations, and should be judged equally if not more heavily on their success in doing so.

By this measure, the findings of the Draft EIS/EIR do not support elimination of the Washington Boulevard alternative as the Locally Preferred Alternative at this time, and we are confident that a more detailed analysis of its benefits, together with a more sophisticated quantitative method for ranking its achievement of objectives, would clearly demonstrate this fact and further demonstrate that it is the best candidate for the Locally Preferred Alternative.

** **The highly simplistic, non-quantitative comparison of the alternatives, particularly the SR 60 and Washington Boulevard build alternatives, inappropriately overemphasizes impacts and inaccurately measures ability to meet project objectives, leading to an unsupported conclusion that the SR 60 alternative is environmentally superior.** ** Table 6-3, in its comparison of the ability of the alternatives to achieve project objectives, simply notes "Yes" or "No", and "High" or "Low" with respect to the objective "Leverage transit investments to provide connections farther east".

Stretching credulity, Table 6-3 states that both the SR 60 and Washington Boulevard alternatives meet all project objectives, in apparently equal measure, a conclusion that is certainly not supported by the evidence presented in the Draft EIS/EIR, and as stated in some of our previous comments in this letter, **is flatly contradicted** by data and conclusions contained in technical appendices to the Draft EIS/EIR – but those data and conclusions are frequently not carried over into the corresponding Draft EIS/EIR technical sections and therefore do not factor into the Evaluation of Alternatives. **The "Yes" and "No" method of representing the alternatives' ability to meet project objectives utterly ignores – and masks – the widely disparate degrees to which the alternatives do so, and does so in favor of the SR 60 alternative and at the expense of the Washington Boulevard alternative,**

which is highly unequable and a serious distortion of what the comparison of alternatives is meant to accomplish under CEQA and NEPA.

The Draft EIS/EIR prepared by Metro in 2010 for the Westside Subway Extension does use numeric metrics in its tabular comparison of the degree to which the alternatives would achieve the project objectives, as does the 2012 Final EIR Westside Subway Extension in its comparison of the Locally Preferred and No Project alternatives. We request an explanation as to why a similar ranking method, or some other equable, quantitative ranking method, was not used to assess the Eastside Extension Phase 2 alternatives in this Draft EIS/EIR. Absent this, we request that the Washington Boulevard alternative be selected as the Locally Preferred Alternative and carried forward for further analysis and a more nuanced discussion of its benefits. *See Attachment 1, HR&A Advisors Technical Memorandum (p. 9-11), for further comment on and analysis of this issue.*

"Leverage transit investments to provide connections farther east" is included in Table 6-3 as one of the key project objectives, but curiously, this is not one of the objectives presented in Chapter 1, Purpose and Need, and is therefore an inappropriate method of comparing the alternatives. Chapter 1 of the Draft EIS/EIR presents the project purpose ("provide area residents, businesses, and transit-dependent populations with a transit alternative connecting them to Metro Gold Line Eastside Extension and the regional rail system") and four objectives:

- Serve the large number of transit-dependent and low-income populations in the project area;
- Increase access to major employment centers, activity centers, and destinations in the project area and Los Angeles County;
- Provide regional transit connectivity with the Metro Gold Line Eastside Extension and Measure R projects; and
- Provide transit alternatives to alleviate roadway congestion, improve mobility options for enhanced quality of life, and provide a convenient and reliable alternative to the automobile.

The Washington Boulevard alternative would facilitate greater connections to Orange County (i.e., to the southeast) and not just to the northeast and northwest as the SR 60 alternative alignment would. With a connection to Orange County, which has already demonstrated willingness and ability to provide rights-of-way to accommodate LRT linkages, the Washington Boulevard alternative would likely result in even greater ridership than the current 2035 projections for this alignment, increasing the utility of the line to residents of Los Angeles County as well as Orange County. **This would much more fully achieve SCAG's Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) goals to**

"Preserve and ensure a sustainable regional transportation system" and "Preserve and ensure a sustainable regional transportation system." Again, this is not considered in the Draft EIS/EIR.

Chapter 1 also presents seven "themes" that it says "articulate the purpose for transit improvement" in the project area, but none of those directly or indirectly mentions "Leverage transit investments to provide connections farther east" (NOT to the west, where the current Gold Line terminates, and not to other Measure R projects). **The apparently "eleventh-hour" inclusion of this apparently new project objective in Chapter 6, Table 6-3, without having originally presented it in Chapter 1 or even in the introduction and narrative restatement of project objectives at the beginning of Chapter 6, is disingenuous, inappropriate under CEQA and NEPA, and since it appears to favor the SR 60 alignment, distorts the equable comparison of alternatives in terms of their ability to meet the original project objectives.**

The other project objectives as presented in Table 6-3 are gross simplifications of the original project objectives as presented in Chapter 1, such that the alternatives comparison is so simplified that it calls into question the validity of the comparison.

- **The original project objective**, "Serve the large number of transit-dependent and low-income populations in the project area", **is reduced to** "Enhance service to transit dependent/low-income populations";
- **The original project objective**, "Increase access to major employment centers, activity centers, and destinations in the project area and Los Angeles County" **is reduced to** "Increase access to activity and employment centers";
- **The original project objective**, "Provide regional transit connectivity with the Metro Gold Line Eastside Extension and Measure R projects" **is missing altogether from the table, and the new objective "Leverage transit investments to provide connections farther *east*"** is apparently substituted in its place; and
- **The original project objective,** "Provide transit alternatives to alleviate roadway congestion, improve mobility options for enhanced quality of life, and provide a convenient and reliable alternative to the automobile" **becomes three separately stated objectives**. **This provides a potentially disingenuous opportunity to characterize the *number* of project objectives each alternatives achieves, which again distorts the process of identification of the environmentally superior alternative.**

We once again reiterate our formal request that Metro and the FTA select the Washington Boulevard alternative as the Locally Preferred Alternative. Not continuing the provision of light rail into our cities will have profound, long-lasting, adverse consequences for the cities and the citizenry who have so much at stake in this process.

We trust our comments will receive the serious consideration they deserve by the Metro Board, staff, and EIS/EIR consultants before the Locally Preferred Alternative is selected in just three weeks.

The Washington Boulevard Light Rail Transit Coalition sincerely appreciates this opportunity to provide comments on the Draft EIS/EIR and looks forward to continued cooperation with Metro as this project progresses and the Final EIR is prepared. Please contact Ronald Bates, Ph.D., Washington Boulevard Light Rail Transit Coalition Consultant, at (323) 983-3680 or ronaldrbates@gmail.com with any questions.

Sincerely,

WASHINGTON BOULEVARD LIGHT RAIL TRANSIT COALITION

Hon. Tina Baca Del Rio
Mayor
City of Commerce

Hon. Brent A. Tercero
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City of Pico Rivera

Hon. Juanita Trujillo
Mayor
City of Santa Fe Springs

Hon. Cathy Warner
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cc: Diane DuBois, Chairperson, MMTA Board of Directors
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Attachment 1, HR&A Advisors Technical Memorandum

ATTACHMENT 1, HR&A ADVISORS TECHNICAL MEMORANDUM

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MEMORANDUM

To:	Washington Boulevard Light Rail Transition Coalition
From:	Paul J. Silvern and Benton Heimsath
Date:	October 17, 2014
Re:	Review of Metro Eastside Transit Corridor Phase II Draft EIS/EIR

At the request of the Cities of Commerce, Pico Rivera, Santa Fe Springs and Whittier, which collectively comprise the Washington Boulevard Light Rail Transit Coalition, HR&A Advisors, Inc. (HR&A) reviewed the presentation and analysis of economic and fiscal, land use and development, community and neighborhood impacts, and evaluation of alternatives in the Metro Eastside Transit Corridor Phase II Draft Environmental Impact Statement/Environmental Impact Report (Draft EIS/EIR), prepared by the Los Angeles County Metropolitan Transportation Authority ("Metro") and the Federal Transit Administration, dated August 2014. More specifically, we focused our review on two of the "build" alternatives analyzed in the Draft EIS/EIR, namely: (1) SR 60 LRT Alternative, which is a light rail line with four stations that parallels State Route 60 (hereinafter, "SR 60"); and Washington Boulevard LRT Alternative, which is a light rail line with six stations that would run through Montebello, Commerce, Pico Rivera, Santa Fe Springs and Whittier (hereinafter, "Washington Blvd"). Both of these alternatives are assumed to be operational by 2035, and therefore the analysis of socio-economic impacts relies on the Southern California of Governments' (SCAG) 2035 regional growth forecast.

We further focused our review of the Draft EIS/EIR on the following Chapters and Sections:

- Chapter 1, Purpose & Need
- Section 4.2, Land Use & Development
- Section 4.4, Economic & Fiscal Impacts
- Section 4.5, Community & Neighborhood Impacts
- Section 4.17, Growth-Inducing Impacts
- Section 4.18, Environmental Justice
- Chapter 6, Evaluation of Alternatives
- All of the Technical Appendices associated with the above Chapters and Sections

Based on a thorough review of these Draft EIS/EIR Chapters and Sections, we find that the analysis of the Washington Blvd and SR 60 alternatives is incomplete in its assessment of economic/fiscal, land use/development, and community/neighborhood impacts. Furthermore, the analysis that is performed is not properly reflected in the final evaluation of alternatives. Because of this, the Draft EIS/EIR fails to adequately analyze the extent to which the alternatives achieve some of the project's objectives. **We recommend that Metro remedy these deficiencies by conducting additional analysis, as discussed below, and develop a weighted and scored environmental impact matrix for a more accurate comparison of the Washington Blvd and SR 60 alternatives, and then recirculate the results for further public comment**.

Economic and Fiscal Impacts

The Draft EIS/EIR's calculations used to estimate the economic and fiscal impacts of these build alternatives do not present a full picture of the economic impacts that would result from the introduction of such an important new transit line. The Draft EIS/EIR calculates the effect of construction and operating spending on "jobs" and "earnings" for Los Angeles County and for the Los Angeles Metropolitan Statistical Area (MSA). The resulting values are determined by applying simple multipliers to the total construction and operating expenditures for each alternative.[1] In addition, the Draft EIS/EIR estimates the value of time saving and the tax losses from acquiring properties needed for construction. This analysis does not capture the full range of economic impacts, for several reasons:

- *Development Benefits Not Accounted For in Economic and Fiscal Impacts.* Both alternatives would clearly generate increased property, sales and other tax revenues from additional development proximity to their respective transit corridors and stations, and from a faster pace of development supported by the proposed transit. The Draft EIS/EIR's Land Use and Development analysis, further discussed below in this memo, concludes that there would be greater development potential for the Washington Blvd alternative, due to the larger number of stations and the fact that the route traverses five cities rather than primarily skirting them along SR 60. An attempt should have been made to quantify the resulting economic and fiscal (i.e., property tax, sales tax and other local tax revenues associated with new development) benefits using regional and national experience with other LRT lines, and the results should have been acknowledged in the economic/fiscal impact analysis. Lacking such analysis, the economic and fiscal benefits that would result from the project are significantly understated.

- *Earnings and Jobs Not Calculated for Localities.* The earnings and employment impacts and value of time savings are only calculated for Los Angeles County and Los Angeles MSA, not for the individual cities most affected by the potential transit project. Use of IMPLAN or other comparable static equilibrium economic impact models could have been used to

[1] Economic and Fiscal Impacts Technical Memorandum, Appendix AA, p. 13-14.

do so. Thus, economic impacts within the cities most directly and profoundly affected by the alternatives are not considered in the Draft EIS/EIR.

- *Differences in Value of Time Savings Not Significant or Supported by Evidence.* The technical memorandum in Appendix AA concludes that the value of the time savings for the SR 60 alternative ($128.3 million) is "modestly greater" than those for the Washington Blvd alignment ($125.5 million).[2] However, this difference is less than 3% over the span of 30 years. The travel demand forecasting reporting does not provide a margin of error for the travel demand predictions, upon which the value of time savings is based, and so the range of outcomes remain unknown to the public and decision makers. But, given the high degree of uncertainty inherent in performing long-term transportation ridership forecasts, it is not appropriate for the Draft EIS/EIR to draw important conclusions about an environmentally superior alternative from such minor differences.

- *Cost of Parking Not Included.* The SR 60 alignment requires almost twice as many parking spaces per station, despite a lower overall projected ridership. The Draft EIS/EIR analysis does not account for the additional cost of constructing or operating the parking spaces. The following counts were totaled from Tables 5-15A and 15-9 of the Transportation Impacts Technical Memorandum in Appendix M1:

Proposed Parking for LRT Station Alternatives

	SR 60[3]	Washington Blvd[4]	Difference
Total station parking	3,454	2,702	702
Parking per station	864	450	414

Metro would bear the cost of constructing and operating an additional 702 parking spaces. The added parking construction would also decrease the amount of developable land in close proximity to the SR 60 stations. In addition, the auto-oriented nature of the stations would require proximate redevelopment projects to construct a substantial number of parking spaces to accommodate the higher share of trips made by car, which would raise the cost of development. By contrast, neighborhood-adjacent LRT along Washington Blvd would allow more people to arrive on foot or by bicycle, and could more effectively serve the transit-dependent populations of the cities served.

[2] Economic and Fiscal Impacts Technical Memorandum, Appendix AA, p. 33.
[3] Table 5-15A, *SR60 Proposed Parking Spaces*, Transportation Impacts Technical Memorandum, Appendix M-1, p.54.
[4] Table 15-9, *Washington Blvd Proposed Parking Spaces*, Transportation Impacts Technical Memorandum, Appendix M-1, p.149.

Land Use and Development

Transit-oriented development projects around the country have shown that transit infrastructure can increase property values and accelerate development, especially when accompanied by regulatory changes that encourage transit-oriented development.[5] Examples of such changes may include streamlined permitting and environmental review, development incentives and density bonuses or other regulatory flexibilities. Localities can benefit through higher property and other taxes, more construction and permanent jobs, and a larger resulting overall tax base from increased economic activity. However, these impacts are not reflected in either the Draft EIS/EIR's Economic and Fiscal Impact analysis or the Evaluation of Alternatives.

The Draft EIS/EIR technical appendices include information that show several factors that indicate significantly greater development opportunities for the Washington Blvd alternative than the SR 60 alternative, especially for development that is transit-oriented and not auto-dependent.

- *Higher Likelihood of Re-zoning by Local Cities.* The Draft EIS/EIR assumes no development beyond what is currently allowed by local zoning: "The opportunities for economic revitalization and growth are consistent with (not in addition to) the applicable land use plans, policies, and regulations of agencies with jurisdiction over the project area."[6] This is a highly questionable assumption. Local jurisdictions in Los Angeles County have already demonstrated their willingness to rezone to allow higher density around transit corridors and stations. And, the Draft EIS/EIR itself, states that "…revitalization initiatives in Commerce and Montebello and the Whittier General Plan's encouragement of mixed-use developments and residential growth in and around commercial activity centers and transportation node corridors make this a more transit-friendly corridor than the SR 60 alignment from a policy perspective."[7] Recent evidence elsewhere in Los Angeles County – for example, the Exposition Transit Corridor Phase 2 in the City of Los Angeles – points to a high likelihood that rezoning would occur to allow for more development surrounding transit stations. Even under existing land use and zoning regulations, however, the Draft EIS/EIR analysis shows that the Washington Blvd alignment is preferable from a land use and development perspective.

- *Higher Potential for Transit-Oriented Development.* The Draft EIS/EIR's analysis indicates that future development along the Washington Blvd alternative would be better oriented towards transit users. The Draft EIS/EIR states that "the proximity of rail stations **would encourage land uses that are not auto-dependent** and not as likely to induce auto trips,

[5] R. Cervero and M. Duncan, "Benefits of Proximity to Rail on Housing Markets: Experiences in Santa Clara County," Journal of Public Transportation Vol. 5, No. 1 (2002A): 1–18; T. Parker, G. Arrington, M. McKeever, and J. Smith-Heimer, "Statewide Transit-Oriented Development Study: Factors for Success in California." Sacramento: California Department of Transportation, 2002; R. Cervero and M. Duncan, "Land Value Impacts of Rail Transit Services in San Diego County", report prepared for the National Association of Realtors and the Urban Land Institute (Washington, D.C.: June 2002).

[6] Chapter 4-17 Growth Inducing Impacts, p.16.

[7] Chapter 4.17 Growth Inducing Impacts, p.10.

which is consistent with regional and local environmental goals."[8] Transit oriented development can decrease dependence on the automobile and serve car free and car light households.

Conversely, the SR 60 alternative presents fewer opportunities for transit-oriented development because of several factors: (1) its proximity to the freeway right-of-way; (2) its relative lack of potential development opportunities within the 1/2 mile station areas; and (3) its need for additional parking spaces to accommodate a park-and-ride oriented ridership base. Users of the SR 60 alignment would likely arrive primarily by car and park at the station park and ride lots, which reduces the benefits of and opportunities for transit-oriented development and/or significantly increases the cost of development to accommodate both park-and-ride demand and the parking needs of new development.

- *More Development Opportunities at Station Areas*. The Draft EIS/EIR's Land Use and Development Opportunities Technical Memorandum identifies developable land within a ½ mile radius of each proposed station ("station areas"), such as vacant parcels and surface parking lots. These opportunities for redevelopment of existing older or lower-density uses provide an indication of the potential for redevelopment to occur. The Draft EIS/EIR analysis finds that the Washington Blvd alignment presents more opportunities for future development. To illustrate this disparity in development potential, the two following charts compare the development opportunities, as summarized in the Draft EIS/EIR's Growth Inducing Impacts Technical Memorandum, within the station areas for both LRT alternatives.

SR 60 Station Areas[9]

Station Name	Redevelopment Opportunities
Garfield Ave	Redevelopment of existing land uses
Shops at Montebello Station	Potential for additional net new development
Santa Anita Station	Limited potential for development (USACE flood control basin)
Peck Road Station	Redevelopment of existing land uses

According to the Draft EIS/EIR, there are limited redevelopment opportunities at three of the four stations. In addition, some existing uses in proximity to the SR 60 alignment present an inherent conflict with any development attempts or potential for future rezoning. For example, the Santa Anita station is directly adjacent to the Whittier Narrows Dam Basin Area. While the identified mitigations will help with the flood storage space within the flowage easement, it does not help with incompatible land uses. Other

[8] Chapter 4.17 Growth Inducing Impacts, p.9.
[9] Land Use and Development Opportunities Technical Memorandum, Appendix CC. p.24-25.

incompatible land uses include a school at the South El Monte terminus and the former Oll landfill site south of SR 60 in the city of Monterey Park.

By contrast, the Draft EIS/EIR finds more opportunities for redevelopment surrounding the potential Washington Blvd alignment stations. As stated in the DEIS/EIR, "opportunities for future development on underutilized parcels, vacant sites, and surface parking lots are present in the vicinity of station locations along the SR 60 LRT Alternative alignment. However, less opportunity exists for future development along this alignment compared to the Washington Blvd LRT Alternative Alignment."[10] This is because the Washington Blvd alignment would have six new stations, all of which are surrounded by urban development, as compared to four SR 60 stations. Additionally, there are opportunities for higher-density uses or new development on vacant sites at four of the six station areas along the Washington Blvd alignment, with redevelopment having already occurred at a fifth station.

Washington Blvd Station Areas[11]

Station Name	Redevelopment Opportunities
Garfield Ave	Redevelopment of existing land uses
Whittier Blvd	Opportunity to redevelop lower-density commercial uses to higher-density and transit-oriented uses
Rosemead Blvd	Redevelopment has already occurred
Greenwood Blvd	Opportunity to redevelop lower-density commercial uses to higher-density and transit-oriented uses
Norwalk Blvd	Redevelopment of existing land uses and a few vacant sites
Lambert Rd	Redevelopment of existing land uses and a few vacant sites

The development opportunities identified in the Land Use and Development Section of the Draft EIS/EIR show significantly greater development opportunities associated with the Washington Blvd alternative. Furthermore, it is reasonable to assume that the opportunities identified around the Washington Blvd alignment stations would lead to revitalization and beneficial economic and fiscal outcomes even under existing land use regulations. The Draft EIS/EIR should have acknowledged these important differences in the development opportunities in its economic impact and fiscal analysis and in its comparison of the build alternatives.

To illustrate this point, consider the current zoning for the ½ mile radius around each station, as presented in the Draft EIS/EIR:

[10] Land Use and Development Opportunities Technical Memorandum, Appendix CC. p.48. (Emphasis added).
[11] Land Use and Development Opportunities Technical Memorandum Technical Appendix CC. p.27.

Current Zoning, ½ Mile Station Areas – SR 60 Alignment[12]

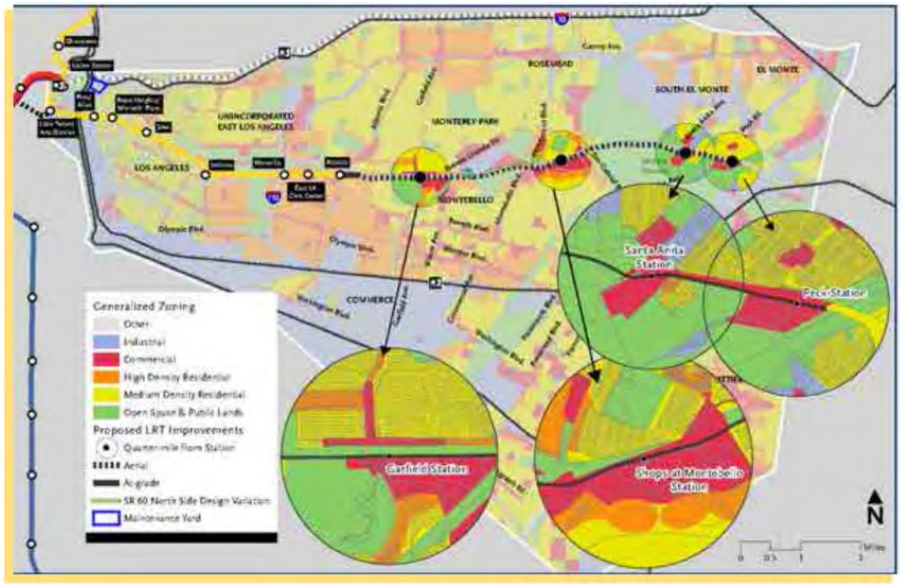

Figure 5-4. SR 60 LRT Alternative Stations - Zoning

The current zoning for the SR 60 station areas indicates the existence of incompatible land uses. A significant portion of the ½ mile station areas are currently designated "open space & public lands", shown in green, which are conflicts that reduce the potential for rezoning.

Current Zoning, ½ Mile Station Areas – Washington Blvd Alignment[13]

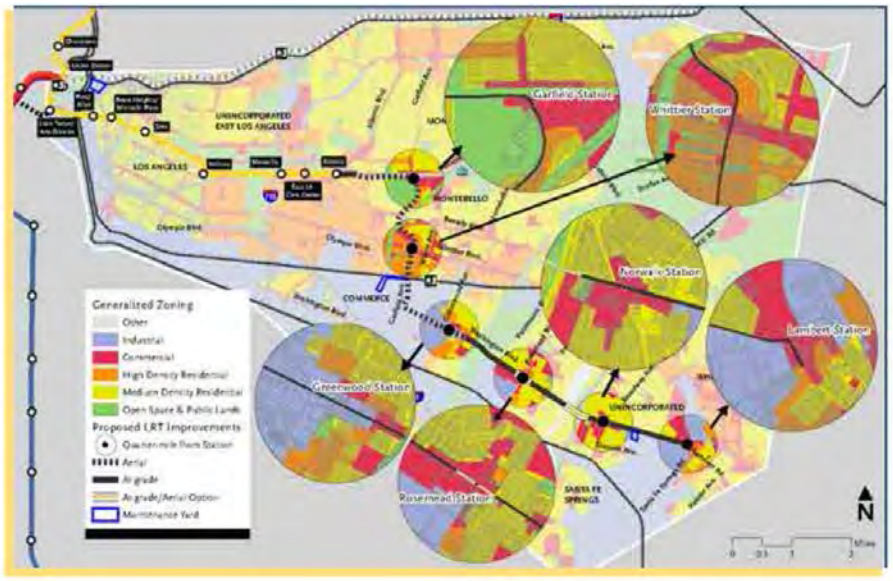

Figure 5-8. Washington Boulevard LRT Alternative Stations – Zoning

The current zoning map for the Washington Blvd station areas indicates a good mix of allowable uses and intensities, indicating greater potential for revitalization, even under existing zoning.

[12] Figure 5-4. *SR-60 LRT Alternative Stations – Zoning*. Land Use and Development Opportunities Technical Memorandum, Appendix N-1, p.35.
[13] Figure 5-8. *Washington Blvd Alternative Stations – Zoning*. Land Use and Development Opportunities Technical Memorandum, Appendix N-1, p.54.

Community and Neighborhood Impacts

Two of Metro's stated policy objectives for the project are "enhancing service to transit-dependent/low income communities" and "increase access to activity and employment centers," but the Draft EIS/EIR alternatives analysis does not compare how well each alternative meets these objectives. Rather, the Draft EIS/EIR limits its consideration of the affected communities and neighborhoods in terms of negative impacts relating to construction and operation. **It does not quantify or compare accessibility benefits that would accrue to low-income, transit-dependent communities**.

Numerous studies have shown that people are more likely to use transit when located within a ¼ to ½ mile radius of transit stations.[14] The Draft EIS/EIR provides some data that allow for a comparison of the characteristics of the communities within a ½ mile corridor of the alignments and the ½ mile radii of the station areas for each LRT alternative. We draw from the Draft EIS/EIR's station area demographics (based on updated 2010 Census data) to compare the two LRT alignments in terms of providing access to communities.

LRT Station Areas (1/2 mile radius)[15]

	SR 60	Wash Blvd	Difference	% Difference
Population	50,244	99,526	49,282	98%
Households	15,034	27,989	12,955	86%
Jobs	11,207	18,931	7,724	69%

LRT Corridor (1/2 mile)[16]

	SR 60	Wash Blvd	Difference	% Difference
Population	79,221	136,234	57,013	72%
Households	23,659	37,993	14,334	61%
Jobs	17,102	28,738	11,636	68%

Based on the LRT Station Areas table, it is evident that the Washington Blvd alignment would provide station area accessibility for 49,282 more people, 12,955 more households, and 7,724 more employment opportunities than the SR 60 alignment, which is not reflected at all in the Draft EIS/EIR's Table 6-3, Alternatives Evaluation Results, reproduced on page 10 of this memorandum. These figures were calculated by adding the total population, households, and employment projections for each station area. Moreover, based on the LRT Corridor table, the Washington Blvd alignment would pass through considerably greater concentrations of population, households, and employment than the SR60 alignment, even beyond the station areas. **These differences are significant, even without taking into account potential increases resulting from potential future redevelopment, and should have been included in the evaluation of how well each**

[14] Lund, Willson and Cervero. 2006. *A Re-Evaluation of Travel Behavior in California TODs*. Journal of Architectural and Planning Research.

[15] Environmental Justice Technical Memorandum Appendix DD, p.16-18, 24-26

[16] Environmental Justice Technical Memorandum Appendix DD, p.16-18, 24-26.

LRT alignment achieves project objectives and highlighted in the evaluation of alternatives. This is particularly important in light of the project objectives to "Serve the large number of transit-dependent and low-income populations in the project area" and "Provide transit alternatives to alleviate roadway congestion, improve mobility options for enhanced quality of life, and provide a convenient and reliable alternative to the automobile."

Furthermore, the Washington Blvd alignment would serve a greater unemployed population. According to the Draft EIS/EIR's Environmental Justice Technical Memorandum, the Washington Blvd corridor would serve an unemployed population of 6,834, versus 3,571 for SR 60, which represents an increase of 91%. Similarly, the Washington Blvd station areas would serve 4,246 unemployed persons, as compared to 1,965 at the SR 60 station areas, an increase of 116%.[17]

Finally, a transit station's configuration affects the ability of transit-dependent people in nearby communities to access the transit line. In Appendix P, the Draft EIS/EIR acknowledges the difficulties presented by freeway-adjacent stations such as those proposed in the SR 60 alignment: "…freeway-adjacent stations are not ideal for community access and connectivity due to the automobile-oriented nature of freeway facilities."[18] The SR 60 alignment's proximity to the SR 60 would require transit patrons to arrive at the station by automobile, as opposed to on foot or by bicycle, and therefore would limit the utility of this line to low-income, zero-car households.

Washington Blvd performs much better from this perspective, because of the neighborhoods that surround the six stations in the four cities. "Stations along major commercial streets, such as most of the proposed stations for the Washington Blvd LRT Alternative, would provide greater community mobility benefits."[19] But the implications of this observation are not included in the community or economic sections of the Draft EIS/EIR. Based on Draft EIS/EIR analysis, it is reasonable to conclude that **mobility benefits for the affected communities would be greater for the neighborhood-adjacent Washington Blvd alternative than for the freeway-running SR 60 alignment alternative**.

Evaluation of Alternatives

From the above discussion and review of the Draft EIS/EIR we conclude that there are significantly greater economic, fiscal, land use, development, community and neighborhood benefits associated with the Washington Blvd alternative, as compared to the SR 60 alternative. The Draft EIS/EIR, however, draws an opposite conclusion because its alternatives comparison is based on a very general, non-quantitative and unsubstantiated set of judgments as shown in the comparison chart, reproduced in part below.

[17] Environmental Justice Technical Memorandum Appendix DD, p.16-18, 24-26.
[18] Community and Neighborhood Impacts Technical Memorandum, Appendix P, p.45.
[19] Community and Neighborhood Impacts Technical Memorandum, Appendix P, p.45.

Portion of Table 6-3, Alternatives Evaluation Results[20]

Criteria	No Build Alternative	TSM Alternative	SR 60 LRT Alternative	Washington Blvd. LRT Alternative
Project Objectives				
Enhance service to transit-dependent/low-income populations	No	Yes	Yes	Yes
Increase access to activity and employment centers	No	Yes	Yes	Yes
Leverage transit investments to provide connections farther east	Low	Low	High	High
Alleviate roadway congestion	No	No	Yes	Yes
Improve mobility options	No	No	Yes	Yes
Provide a convenient/reliable alternative to the automobile	No	No	Yes	Yes

This alternatives comparison chart is cursory in its evaluation of project objectives, stating simply that both SR 60 and Washington Blvd LRT alignment alternatives "meet all project objectives."[21] Though the conclusion states that the mobility and land use benefits would be greater for the Washington Blvd alternative than the others,[22] no attempt is made to describe or quantify the trade-offs between the two LRT alternatives with respect to project objectives. The conclusions drawn from this chart do not reflect the differences discussed above.

A more complete alternatives comparison should have included a weighted and scored matrix for a range of potential impacts and benefits. For example, as discussed on pages 8 and 9 of this memorandum, the Washington Blvd alignment corridor and stations would serve significantly greater concentrations of population, households, and employment, as compared to the SR 60 alignment. This large disparity, which is fundamental to the abilities of the two build alternatives to achieve project objectives, is not taken into consideration in the Draft EIS/EIR's Alternatives Evaluation Results. The simplistic "yes" or "no" analysis presented in Table 6-3 does not communicate – and in fact masks – the degree to which each alternative achieves given objectives. Categories such as development potential or increased accessibility could have been scored with a numerical ranking on a scale of 1to 5. For example, a comparison based on the areas highlighted in this memo could be constructed as follows:

[20] Chapter 6 Evaluation, p. 6-9.
[21] Chapter 6 Evaluation, p. 6-11.
[22] Chapter 6 Evaluation, p. 6-9.

Possible Weighted Matrix Layout

	No Build	**TSM**	**SR 60**	**Wash Blvd**	**Weighted Value**	**Total Score**
Total Economic and Fiscal Impacts	1 to *5*	1 to *5*	1 to *5*	1 to *5*	0 to 1	
Service to Transit-Dependent Population						
Access to Employment Opportunities						
Availability of Development Parcels						
Transit-Oriented Development Potential						

An analysis along these lines would more fully and fairly account for the project's economic, fiscal, land use, development community and neighborhood impacts and benefits, and thereby provide a better picture of how each alternative fulfills the project objectives. Based on the information included in the Draft EIS/EIR and presented in this memo, **a more rigorous and thorough comparison of this type would likely conclude that the Washington Blvd alignment does a much better job of meeting project objectives, and would do so in a way that provides more economic and environmental benefits to the affected communities.**