Attachment A

Los Angeles County
Metropolitan Transportation Authority

SR 60 and Combined Alternatives Issues and Constraints Report

GOLD LINE EASTSIDE TRANSIT CORRIDOR PHASE 2

Metro

Prepared for
Los Angeles Metropolitan Transportation Authority
One Gateway Plaza
Los Angeles, CA 90012

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SR 60 and Combined Alternatives Issues and Constraints

January 30, 2020

Prepared for
Los Angeles County Metropolitan Transportation Authority
One Gateway Plaza
Los Angeles, CA 90012

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ABBREVIATIONS AND ACRONYMS

ADL	aerially deposited lead
AA	Alternatives Analysis
ACS	American Community Survey
Caltrans	California Department of Transportation
CDFW	California Department of Fish and Wildlife
CEQA	California Environmental Quality Act
CWA	Clean Water Act
EIR	Environmental Impact Report
EIS	Environmental Impact Statement
EFC	Equity Focus Communities
FLM	First/Last Mile
FTA	Federal Transit Administration
HOV	high-occupancy vehicle
IOS	initial operating segments
I	Interstate (I)
LBV	Least Bell's Vireo
LRT	light rail transit
LRV	light rail vehicles
LPA	Locally Preferred Alternative
LRTP	Long-Range Transportation Plan
LACDA	Los Angeles County Drainage Area
LACFCD	Los Angeles County Flood Control District

Metro	Los Angeles County Metropolitan Transportation Authority
LARWQCB	Los Angeles Regional Water Quality Control Board
MSF	Maintenance and Storage Facility
MRDC	Metro Rail Design Criteria
NEPA	National Environmental Policy Act
NPDES	National Pollutant Discharge Elimination System
NRHP	National Register of Historic Places
NOI	Notice of Intent
OHWM	ordinary high water mark
OII	Operating Industries, Inc. Superfund
OU	operable units
ROW	right-of-way
RHA	Rivers and Harbors Act
RTP	Regional Transportation Plan
SR	State Route
SCAG	Southern California Association of Governments
SCS	Sustainable Communities Strategy
STPP	Supportive Transit Parking Program Master Plan
TAC	Technical Advisory Committee
SCE	Southern California Edison
STPP	Supportive Transit Parking Program Master Plan
TOC	Transit-Oriented Communities
TSM	Transportation Systems Management
TPSS	traction power substations
TBM	Tunnel Boring Machine

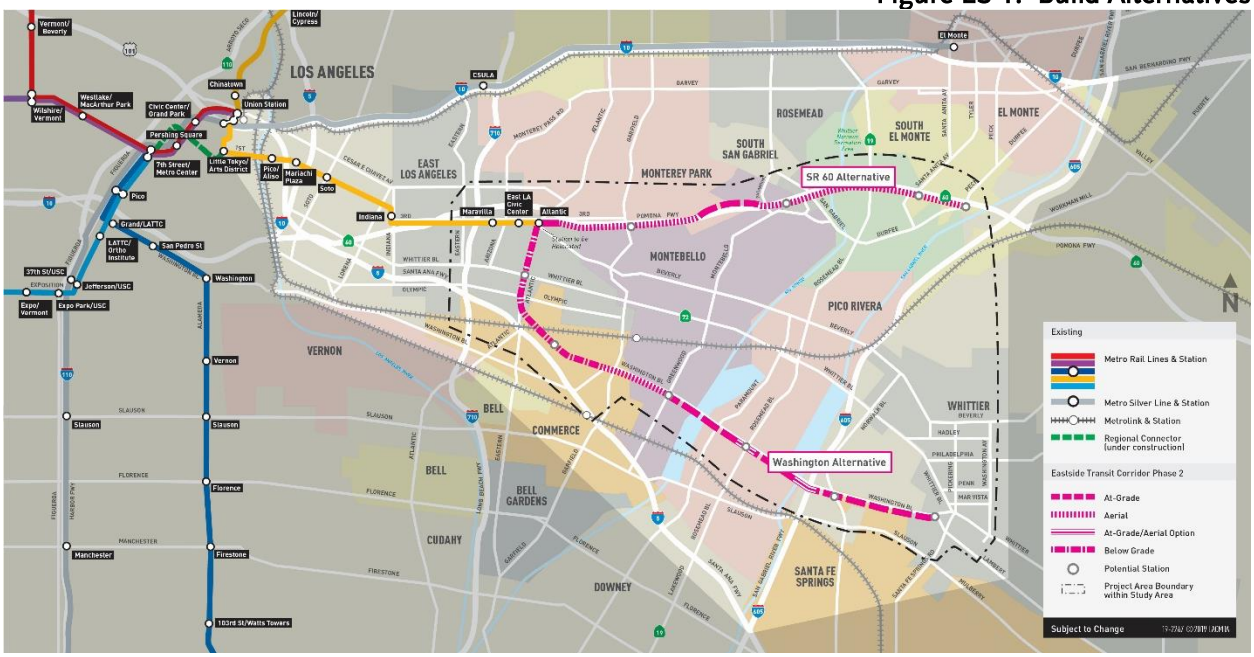
EPA	United States Environmental Protection Agency
USACE	United States Army Corps of Engineers
UPRR	Union Pacific Railroad
WDR	Waste Discharge Requirements

EXECUTIVE SUMMARY

Throughout the history and evolution of the Eastside Phase 2 Transit Corridor Project (Project), the SR 60 Alternative has posed considerable environmental and engineering challenges with running parallel to the SR 60 Freeway. These concerns have been analyzed and reevaluated through several studies beginning with the 2014 Draft Environmental Impact Statement/Environmental Impact Report (EIS/EIR), the 2017 Post Draft EIS/EIR Technical Study, and additional focused analyses that were initiated in 2019 in conjunction with a reinitiated environmental analysis.

Currently, Metro is studying three Build Alternatives; SR 60 Alternative, Washington Alternative, and the Combined Alternative, in the reinitiated environmental study. Figure ES-1 illustrates the three Build Alternatives.

Figure ES-1. Build Alternatives



This report documents the constraints, challenges and impacts of the SR 60 Alternative and the Combined Alternative for the Eastside Transit Corridor Phase 2 Project. The Project has been studied extensively and has evolved since its inception. An Alternatives Analysis (AA) was initiated for the Project in 2007, wherein 47 alternatives were evaluated. In January 2009, the Metro Board approved the AA and identified the SR 60 Alternative and the Washington Alternative to be carried forward. The 2014 Draft EIS/EIR, was released on August 22, 2014. Due to the volume and scope of comments received, the Metro Board deferred the selection of an LPA and directed staff to carry out additional technical work to address concerns raised by key stakeholders (Caltrans, United States Environmental Protection Agency, and United States Army Corps of Engineers) and the community. The technical work also included identifying a new north-south alignment to connect to the Washington Alternative.

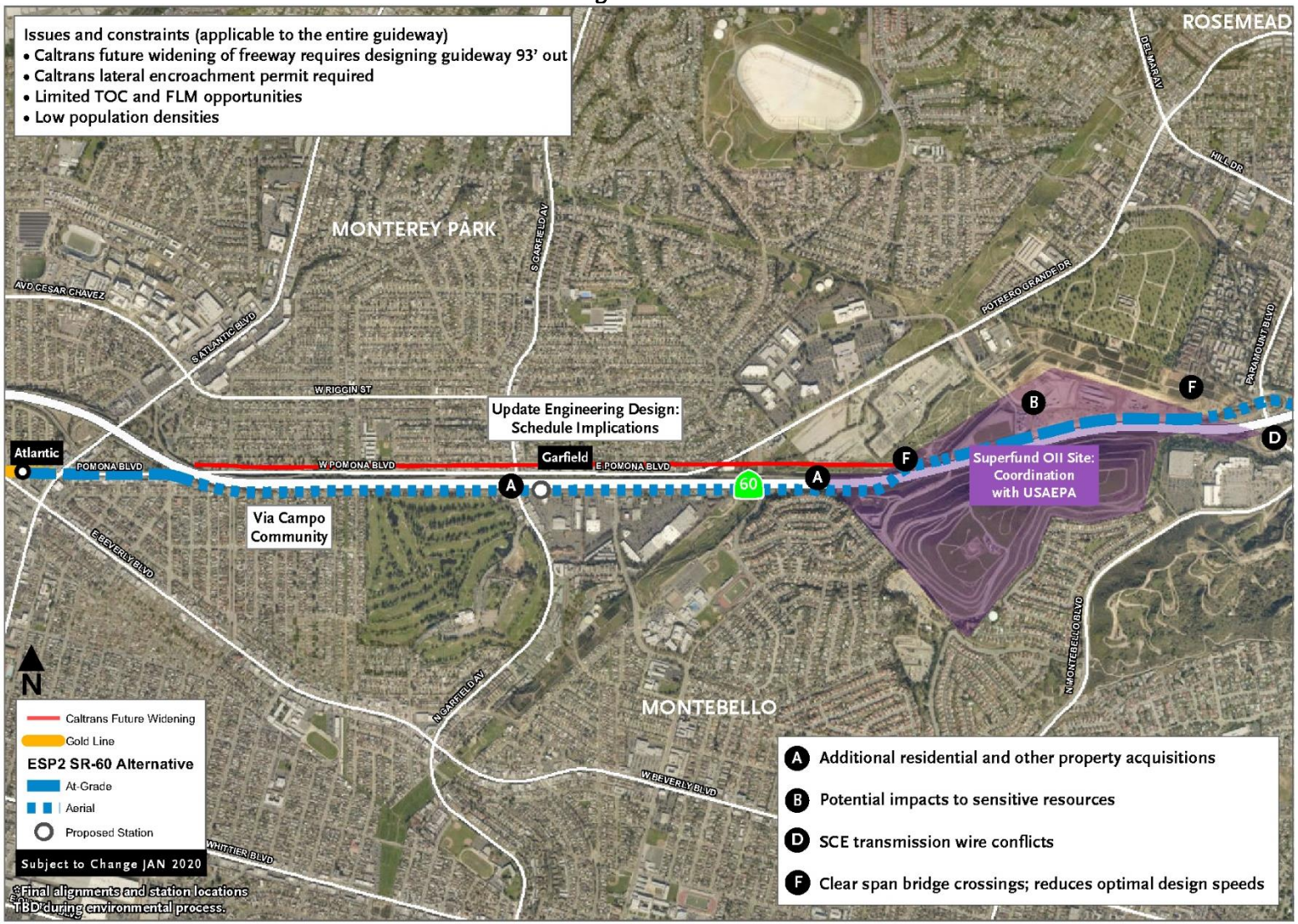
From the onset, the SR 60 Alternative posed environmental and engineering challenges associated with running parallel to the SR 60 Freeway, adjacent to environmentally sensitive resources. These concerns have been analyzed and reevaluated. Most recently, Metro reinitiated the environmental review process

for the Project in 2019, which includes advanced conceptual engineering, environmental analysis, and ongoing outreach efforts for the three Build Alternatives.

The in-depth analysis of the design constraints and environmental impacts summarized in this report have substantiated the adverse issues and challenges associated with the SR 60 Alternative and the Combined Alternative. To summarize, the SR 60 Alternative guideway traverses environmentally sensitive land uses and resources including the Operating Industries, Inc. (OII) Superfund site, Whittier Narrows Flood Control Basin, Whittier Narrows Recreation Area, environmental justice communities, residential and educational land uses, and major utility corridors. To accommodate Caltrans' future expansion plan of the SR 60 Freeway the guideway would also need to be relocated approximately 93-feet which would further increase the potential constraints and impacts and would require additional property acquisitions, construction impacts, and increase costs.

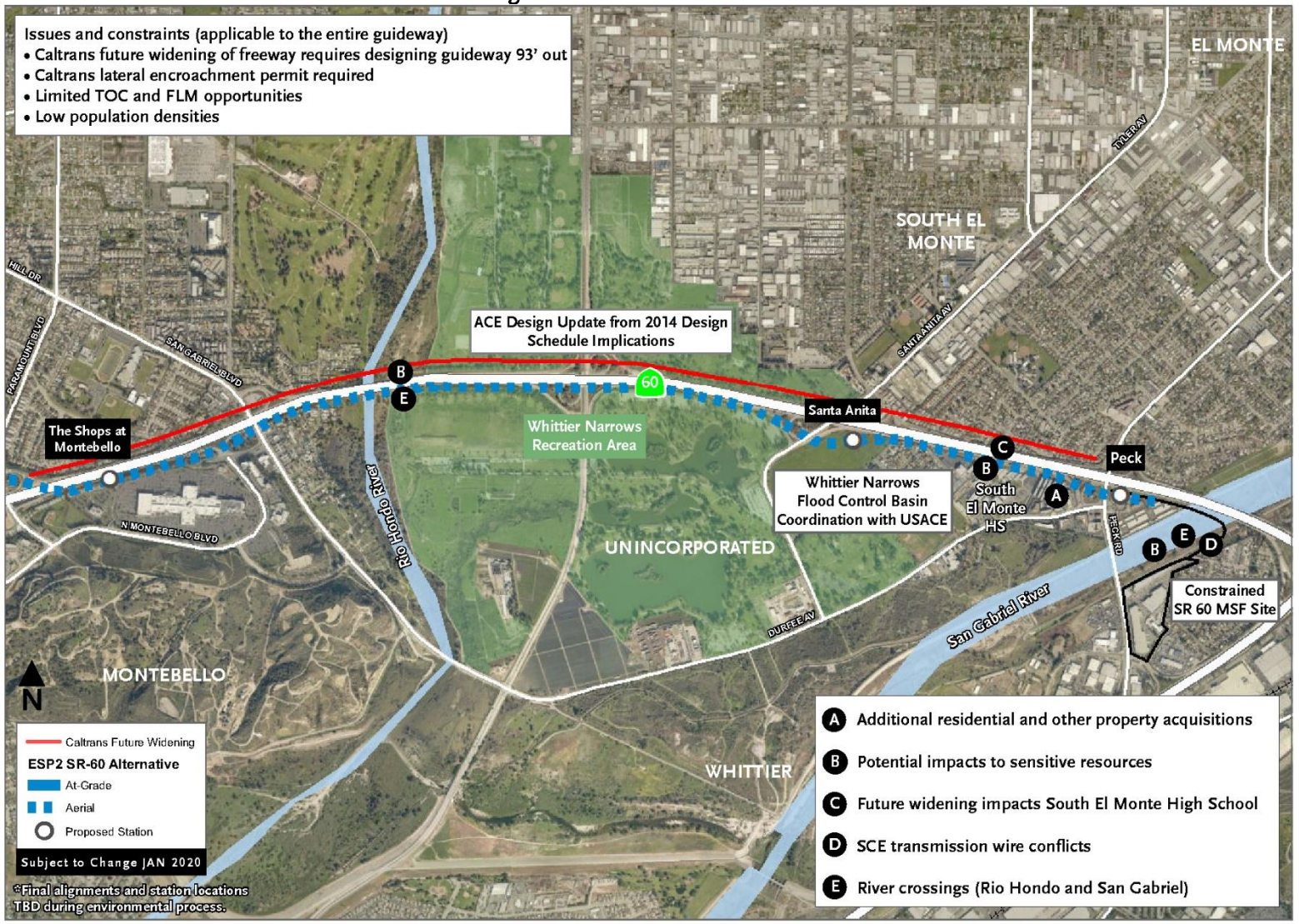
These challenges would require unconventional permitting processes and extensive agency coordination, taking a considerable amount of time, potentially adding several years of delay to the Project schedule. In addition, the SR 60 Alternative and the Combined Alternative are inconsistent with Metro's most recent policies and programs relative to equity, Transit Oriented Communities, First/Last Mile, and parking. Figure ES-2 and Figure ES-3 illustrate the key constraints and challenges associated with the SR 60 Alternative. For a more detailed discussion related to these key constraints, see Section 3.

Figure ES-2. SR 60 Issues and Constraints Atlantic Blvd. to Paramount Blvd.



Source: Metro 2020

Figure ES-3. SR 60 Alternative Issues and Constraints Paramount Blvd. to Peck Blvd.



Source: Metro 2020

The Combined Alternative exhibits the same issues and challenges associated with the SR 60 Alternative, but introduces additional complexities and constraints, requiring infrastructure and operational elements that would not otherwise be required if one of the alternatives was operated as a "stand alone" line. Specifically, the Combined Alternative would include a wye junction in East Los Angeles near the Via Campo neighborhood, an environmental justice community. Therefore, in addition to the issues and constraints mentioned for the SR 60 Alternative, the Combined Alternative would require additional property acquisitions, construction impacts in the Via Campo neighborhood, and increases in costs to accommodate the wye junction.

The Project is identified by Metro's Board of Directors as one of the four pillar projects and is a high priority project for potential acceleration in anticipation of the 2028 Summer Olympic and Paralympic Games. A considerable amount of time would be required to resolve and study the environmental issues and design constraints for the SR 60 and Combined Alternatives. Close coordination and permitting processes would be required by the three Cooperating Agencies: Caltrans, USACE, and EPA. Specifically, the SR 60 Alternative would require a Lateral Encroachment Permit from Caltrans which is an unconventional permitting process for Caltrans that would require extensive reviews. These factors pose potential risks and delays to the overall schedule of the Project.

In conclusion, the Washington Alternative is a viable option with less constraints in contrast to the SR 60 Alternative. Cooperating Agencies had less concerns regarding the Washington Alternative. More importantly, it avoids conflicts with Caltrans ROW, federally protected resources, and avoids major utility conflicts that are more prominent along the SR 60 Alternative.

The Washington Alternative exhibited better compatibility with Metro's adopted policies. Proposed stations along the Washington Alternative demonstrated greater TOC compatibility. The stations are planned in areas with a connected street network making it easier to walk, bike, and ride transit. Station areas either have existing transit-supportive land use patterns or have the potential for future planning efforts. This is mainly because the stations along this alignment are located close to existing residential neighborhoods and commercial corridors. In general, the Washington Alternative stations are situated in areas with a higher presence of residential land uses, serving more economically disadvantaged communities who would benefit from improved transit access consistent with Metro's Equity Platform.

Based on the results of further engineering studies, environmental analysis, focused technical analyses, new Metro community oriented policies, key stakeholder input, and schedule implications, it is recommended that the Metro Board withdraw the SR 60 Alternative and the Combined Alternative from further consideration in the Supplemental/Recirculated Eastside Transit Corridor Phase 2 Project environmental study that is currently underway. Withdrawing these alternatives will allow Metro to streamline the environmental review process and design in support of acceleration goals. Metro recognizes the mobility needs along the SR 60 Freeway corridor and within the San Gabriel Valley and recognizes the need to continue to work with key stakeholders and the communities in this area to identify alternative transit solutions.

1 INTRODUCTION

1.1 Purpose of this Report

This document outlines issues and constraints gathered from the ongoing evaluations conducted for the State Route (SR) 60 and Combined Alternatives for the Eastside Transit Corridor Phase 2 Project (Project). The purpose of the report is to provide the design constraints, environmental impacts, outreach efforts, and consistency with updated Metro related policies to help determine whether these alternatives achieve the overall purpose and need for the Project and meet the Project objectives. The report is not intended to be an alternatives analysis; however, the report does provide a high level comparison to the Washington Alternative where necessary to better understand the constraints present for the SR 60 Alternative The report presents the history and evolution of the Project since the early planning phase that started in 2007.

From the onset, the SR 60 Alternative posed environmental and engineering challenges associated with running parallel to the SR 60 Freeway adjacent to sensitive land uses and environmental resources. These concerns have been analyzed and reevaluated through several studies beginning with the 2014 Draft Environmental Impact Statement/Environmental Impact Report (EIS/EIR), the 2017 Post Draft EIS/EIR Technical Study, and additional focused analyses that were initiated in 2019. The technical work also included identifying a new north-south alignment to connect to the Washington Alternative. Most recently, the Los Angeles County Metropolitan Transportation Authority (Metro) initiated a Supplemental/Recirculated environmental review process for the project in 2019, which includes advanced conceptual engineering, environmental analysis, additional focused technical analyses along the SR 60 Freeway, and ongoing outreach efforts. Inconsistencies with Metro's most recent policies and stakeholder and community input have further substantiated the adverse issues associated with the SR 60 Alternative.

This report documents the constraints, challenges and impacts of the SR 60 Alternative and the Combined Alternative for the Eastside Transit Corridor Phase 2 Project and recommends further analysis be conducted to identify suitable transportation options to meet the needs of the San Gabriel Valley.

1.2 Organization of this Report

This evaluation of SR 60 and Combined Alternatives report is organized in the following sections:

- **Introduction** – Provides context for the Project, including the purpose and need, objectives, location and setting, alternatives, and history and background of the Project.
- **Description of SR 60 Alternative and Combined Alternative** – Presents the characteristics of the SR 60 Alternative and Combined Alternative, including guideway alignment, operating hours and frequency, proposed stations, and Maintenance and Storage Facility (MSF).
- **Design Constraints and Challenges** – Identifies the physical and technical design constraints and challenges associated with the SR 60 Alternative and the Combined Alternative.
- **Environmental Impacts** – Describes the sensitive land uses and environmental resources, associated impacts, and regulatory requirements along the SR 60 Alternative and the Combined Alternative.

- **Stakeholder and Community Concerns** – Highlights the input received from key stakeholders and the community.
- **Consistency with Metro Policies** – Discusses consistency with Metro's key related policies and programs.
- **Summary and Recommendations** – Summarizes the findings and conclusions of the report, leading to potential recommendations and next steps for the Metro Board to consider regarding the SR 60 and Combined Alternatives.

1.3 Project Overview

Metro is currently preparing a Supplemental/Recirculated Draft EIS/EIR for the Project, which proposes to extend the Metro Gold Line further east from the Atlantic Station, the current terminus at Pomona Boulevard and Atlantic Boulevard in East Los Angeles, to either South El Monte via SR 60, Whittier along Washington Boulevard, and/or the Combined Alternative. Metro is the lead agency for the Recirculated Draft EIR pursuant to the California Environmental Quality Act (CEQA). The Federal Transit Administration (FTA) is the lead agency for the Supplemental Draft EIS under the National Environmental Policy Act (NEPA).

The proposed Project is identified in Metro's 2009 Long-Range Transportation Plan (LRTP), as amended. It is primarily funded by local tax measures, Measure R (approved by voters in November 2008) and Measure M (approved by voters in November 2016). Funding for the Project has been programmed in two cycles, with one alignment identified in Cycle 1 and the second alignment in Cycle 2:

- Cycle 1 allocates $3 billion in 2029
- Cycle 2 allocates $3 billion in 2053

The Project is also identified by Metro's Board of Directors as one of the four pillar projects that is considered a high priority project for potential acceleration. Per the initiative, if funding can be secured prior to the programmed 2029 funding cycle, one alternative could begin construction earlier (in anticipation of the 2028 Summer Olympic and Paralympic Games).

1.4 Project Objectives

The mobility problems and potential improvements for this corridor have been well documented. Previous studies include Metro Red Line planning studies, Eastside Transit Corridor Studies: Re-Evaluation Major Investment Study (2000), the Eastside Transit Corridor Phase 2 Final Alternatives Analysis Report (2009), the Eastside Transit Corridor Phase 2 Alternatives Analysis Addendum (2009), Eastside Transit Corridor Phase 2, Draft EIS/EIR (2014), Post Draft EIS/EIR Technical Study (2017), Southern California Association of Governments (SCAG) planning studies, the Metro Rapid Demonstration Project (2000), and in SCAG's Regional Transportation Plan (RTP 2004). The purpose of the Project is to improve transit access and mobility by connecting communities of eastern Los Angeles County to Metro's regional transit system. It would provide residents, employees, visitors, businesses, and the historically underserved populations with a high-quality and efficient transit alternative in the project area. The Project would be integrated within local communities, improve regional connectivity, and provide improved access for eastern Los Angeles County.

The Project would help accommodate the increasing population and employment growth in eastern Los Angeles County, address the demand for transit service and meet the needs of existing communities in eastern Los Angeles, including the transit dependent populations and low-income residents.

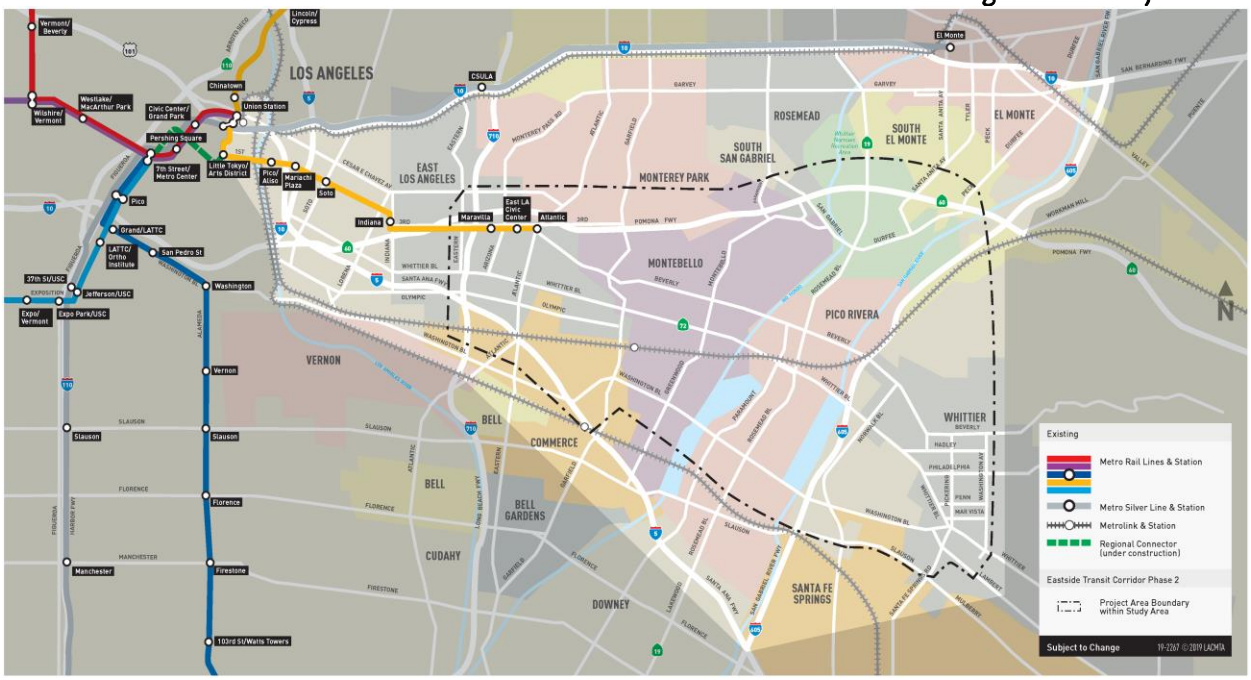
In addition, the Project would provide transit options as a convenient and reliable alternative to the automobile, encourage transit supportive land use and economic opportunities, improve quality of life by increasing environmental benefits, enhancing access to public services and major employment centers, and address limited connections to the regional transit network.

1.5 Project Location

The Project would extend the Metro Gold Line, a light rail transit (LRT) line, from its current terminus at the Atlantic Station in the unincorporated area of East Los Angeles to eastern Los Angeles County. It would extend the existing Metro Gold Line approximately 6.9 to 16 miles, depending on the alternative.

The project area is generally bound slightly north of the SR 60 Freeway, with Peck Road in South El Monte and Lambert Road in Whittier to the east, Interstate (I) 5 and Washington Boulevard to the south, and I-710 to the west, as shown on Figure 1-1.

Figure 1-1. Project Area



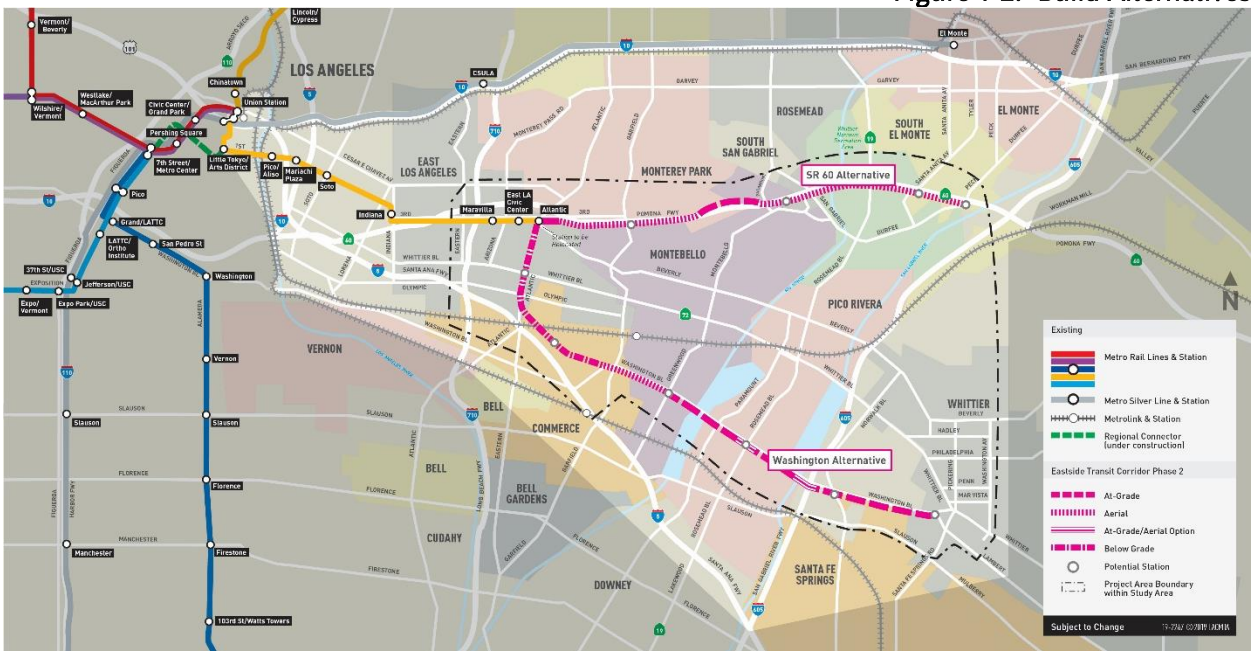
Source: Metro; CDM Smith, 2019

1.6 Build Alternatives

Metro is currently studying three Build Alternatives and the No Build Alternative as shown on Figure 1-2:

- SR 60 Alternative
- Washington Alternative
- Combined Alternative (build out of both the SR 60 and Washington Alternatives)

Figure 1-2. Build Alternatives



Source: Metro; CDM Smith/AECOM JV, 2019.

1.6.1 No Build Alternative

The No Build Alternative would maintain existing transit service through the year 2042. No new transportation infrastructure would be built within the project area aside from projects currently under construction or funded for construction and operation by 2042 via the 2008 Measure R or 2016 Measure M sales taxes. This alternative would include the highway and transit projects in Metro's 2020 LRTP Update and the 2016 SCAG RTP.

1.6.2 SR 60 Alternative

The SR 60 Alternative is approximately 6.9 miles with four proposed stations. The alignment generally follows the southern edge of the SR 60 Freeway from Atlantic Station, the current Metro Gold Line terminus at Pomona Boulevard and Atlantic Boulevard and continues to Peck Road in the city of South El Monte. A 1.5-mile segment shifts to the north side of the freeway, between Greenwood Avenue and Paramount Boulevard to address technical issues regarding the proximity to the Operating Industries,

Inc. (OII) Superfund site and avoid disturbance of contaminated materials. Proposed stations along this route that are being considered include:

- Garfield Avenue station in Montebello
- The Shops at Montebello station in Montebello
- Santa Anita Avenue station in South El Monte
- Peck Road station in South El Monte

1.6.3 Washington Alternative

The Washington Alternative is approximately 9 miles with seven proposed stations. The alignment would travel south along Atlantic Boulevard in an underground segment from the current Metro Gold Line terminus station at Pomona Boulevard and Atlantic Boulevard to the Citadel Outlets in Commerce. The route then proceeds east along Washington Boulevard via aerial and at-grade (street level) configurations ending at Lambert Road in the city of Whittier. Proposed stations along this route that are being considered include:

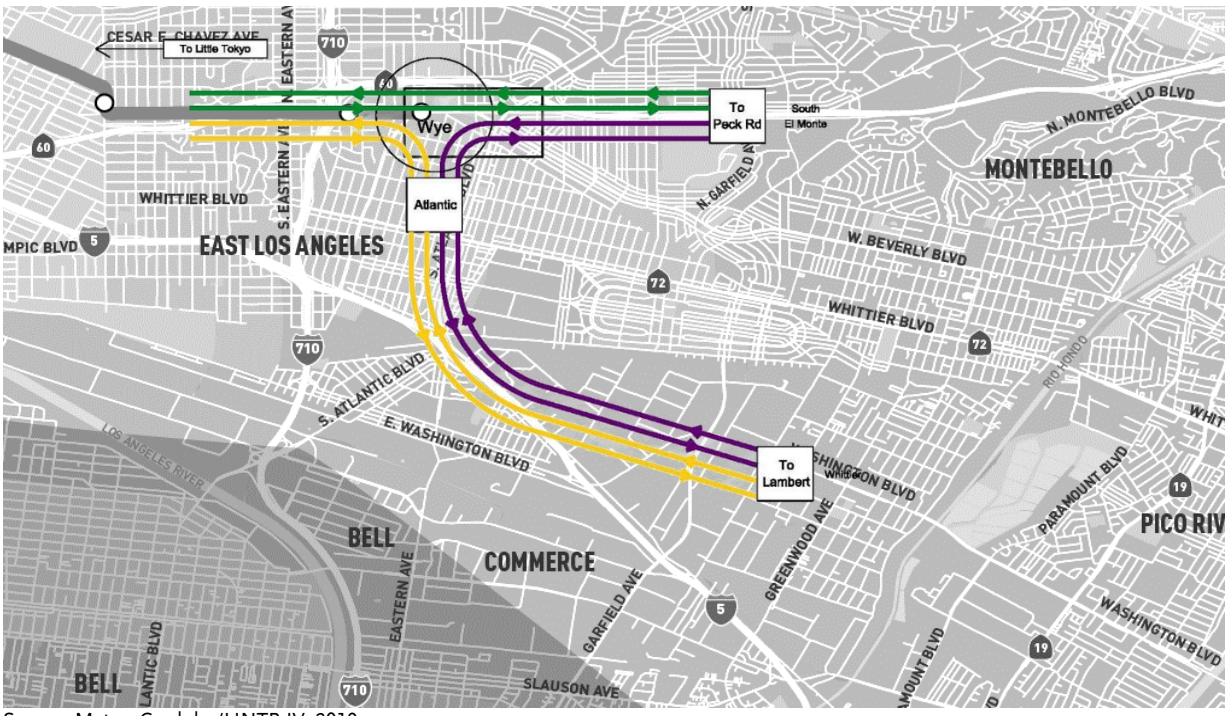
- Redesigned Atlantic Boulevard station in East Los Angeles
- Atlantic/Whittier Boulevard station in East Los Angeles
- Commerce/Citadel station in Commerce
- Greenwood Avenue station in Montebello
- Rosemead Boulevard station in Pico Rivera
- Norwalk Boulevard station serving unincorporated Los Nietos, Whittier and Santa Fe Springs
- Lambert Road station in Whittier

1.6.4 Combined Alternative

The Combined Alternative explores the potential build out and operation of both the SR 60 and Washington Alternatives as described above. The Combined Alternative would allow service from South El Monte and Whittier to downtown Los Angeles and the regional transit network. The alterative would require infrastructure and operational elements that would not otherwise be required if only one of the alternatives was operated as a "stand alone" line.

The Combined Alternative would also provide a one-seat ride allowing for connection between South El Monte and Whittier in a "C" configuration via a wye junction (i.e., three-way junction). Specifically, the Combined Alternative would include a wye junction in the East Los Angeles area near the Via Campo neighborhood, that would connect the SR 60 and Washington Alternatives, allowing alternating train movements between both lines. The wye junction would also accommodate a third service line between South El Monte and Whittier. Figure 1-3 depicts the three service lines for the Combined Alternative.

Figure 1-3 Combined Alternative Service Lines



Source: Metro; Cordoba/HNTB JV, 2019

The Combined Alternative and wye junction would have impacts related to operations, cost, and property acquisitions and construction in the East Los Angeles community near the Via Campo neighborhood that would be additive to the impacts of the SR 60 and Washington Alternatives. These additional impacts are described in **Section 3.7**.

1.7 Project Context

A diverse mix of land uses are located within the project area. The following is a description of the cities, communities, and land uses along each alternative.

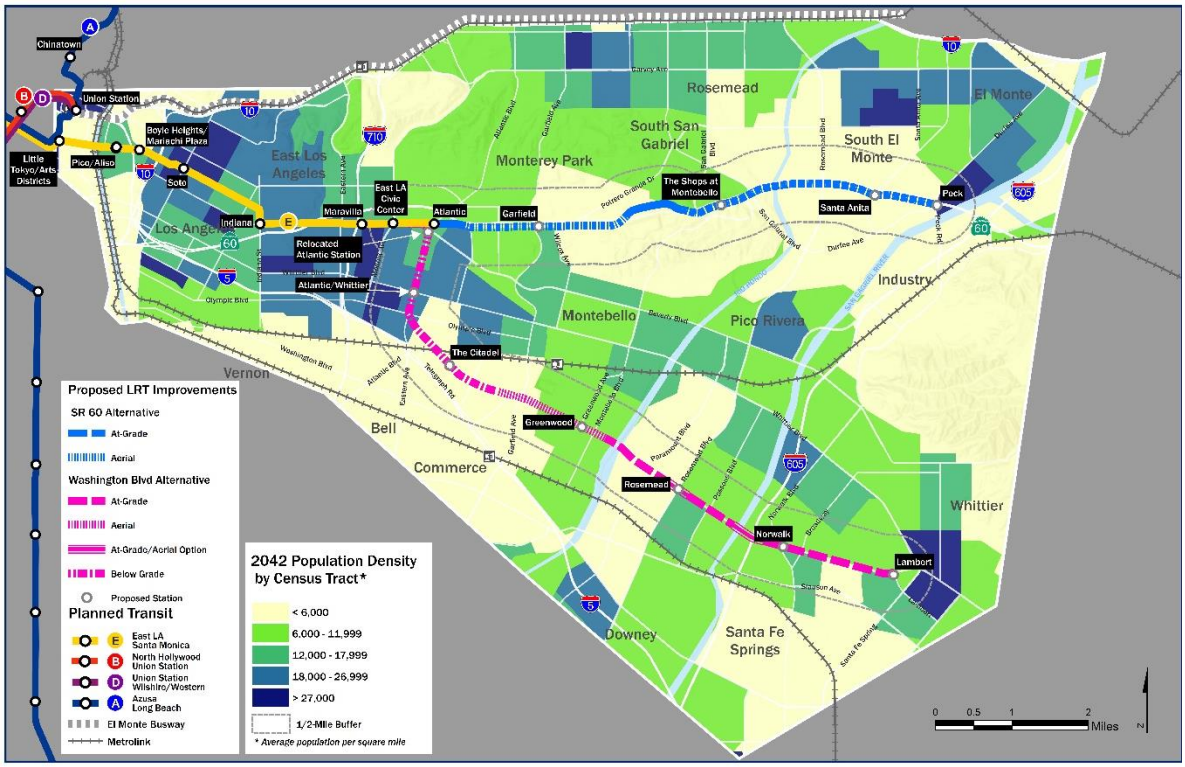
SR 60 Alternative: Unincorporated East Los Angeles County, Montebello, Monterey Park, Rosemead, and South El Monte. The surrounding land uses include single family residences, commercial and retail uses, schools, regional parks and recreational use including the Whittier Narrows Recreation Center, and flood control facilities.

Washington Alternative: Unincorporated East Los Angeles County, Commerce, Montebello, Pico Rivera, Santa Fe Springs, Whittier, and the community of West Whittier-Los Nietos. The surrounding land uses include single- and multi-family residences, commercial and retail uses, industrial development, health and medical uses, and educational institutions. It would traverse densely populated, low-income, and heavily transit dependent communities with major activity centers.

Combined Alternative: Explores the potential build out of both the SR 60 and Washington Alternatives and includes the cities and communities along each corridor, as described above.

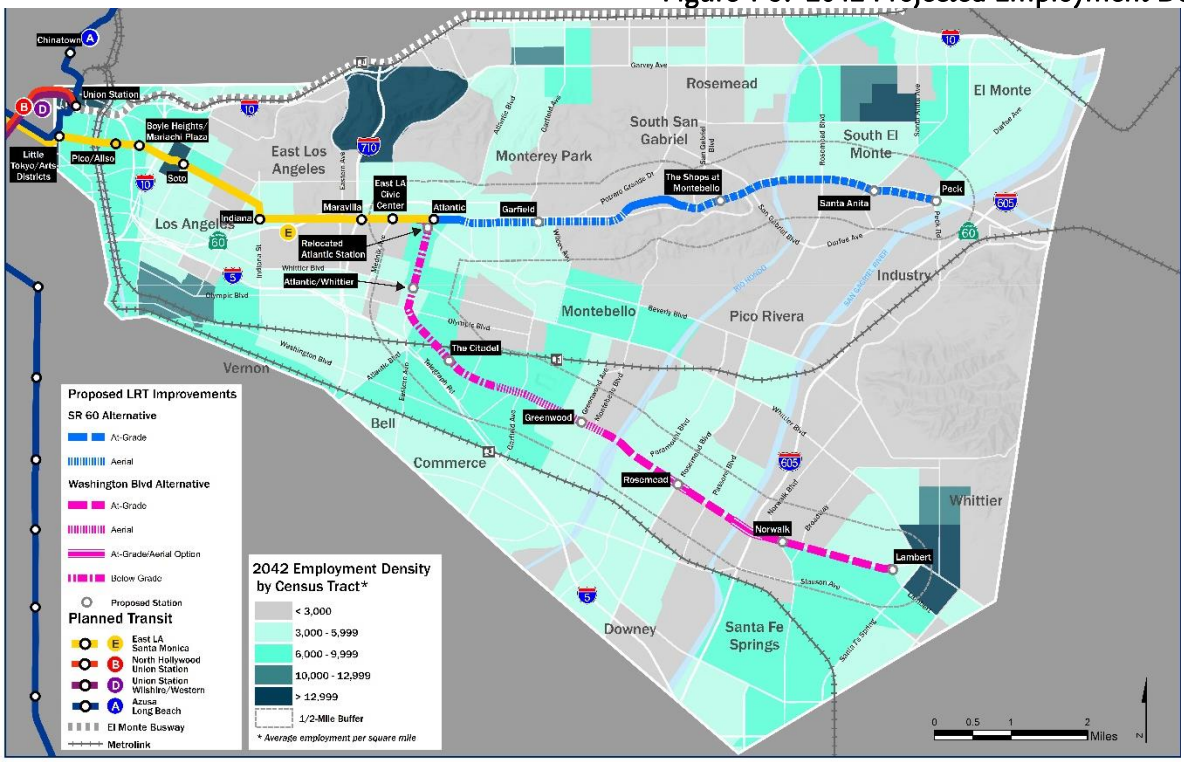
The population and employment densities along each alternative are projected to grow within the project area over the next 20 years. In 2042 it is projected that population will increase 11% and employment will increase 25%. The growth will continue to strain the transportation network throughout Los Angeles County. Figure 1-4 and Figure 1-5 illustrate the projected population and employment densities in 2042.

Figure 1-4. Projected Population Density



Source: American Community Survey (ACS), 2017 and SCAG 2016 RTP/Sustainable Communities Strategy (SCS); CDM/AECOM JV, 2019.

Figure 1-5. 2042 Projected Employment Density



Source: American Community Survey (ACS), 2017 and SCAG 2016 RTP/Sustainable Communities Strategy (SCS); CDM/AECOM JV, 2019.

Table 1-1 provides an overview of the project area population and employment density as well as within a half mile of the alternatives for 2018 and 2042. As shown, population and employment are projected to grow within the study area over the next 20 years, continuing to strain the transportation network. However, slower growth rates and lower population and employment densities are expected along the SR 60 Alternative, which is less conducive to serving a high capacity transit system. By comparison, the Washington Alternative is projected to have higher growth rates and run along a denser corridor in terms of both population and employment.

Table 1-1. 2018 and 2042 Population and Employment Density

Alternatives	Study Area - Square Miles	Total Population			Population Density		
		2018	2042	Percent Change	2018	2042	Percent Change
Study Area	82	721,882	799,033	11%	8,798	9,739	11%
SR 60 Alternative	20	94,356	100,162	6%	4,793	5,088	6%
Washington Alternative	21	169,789	190,932	12%	8,091	9,099	12%
Combined Alternative	39	243,237	267,790	10%	6,256	6,887	10%
Alternatives	**Study Area - Square Miles**	**Total Employment**			**Employment Density**		
		2018	**2042**	**Percent Change**	**2018**	**2042**	**Percent Change**
Study Area	82	273,735	342,049	25%	3,336	4,169	25%
SR 60 Alternative	20	40,002	44,189	10%	2,032	2,245	10%
Washington Alternative	21	82,433	108,534	32%	3,928	5,172	32%
Combined Alternative	39	115,569	145,307	26%	2,972	3,737	26%

Source: 2016 Southern California Associate of Governments (SCAG) RTP Forecast, 2040 Extrapolated to 2042; AECOM, 2019.
Note: Alternative population and employment densities calculated within a 1/2-mile buffer of alignment.

According to the American Community Survey (ACS), transit dependent populations are typically the following segments: older adults, individuals with disabilities, low-income, zero-vehicle households and youth. The project area has a high level of transit dependent residents who lack convenient and reliable transit options to get to their destinations. The densities of transit dependent populations are located within the project area. Accordingly, lower concentrations of transit dependent populations exist along the SR 60 Freeway versus the Washington Alternative. Thus, a transit option within the SR 60 Freeway corridor would not benefit as many transit dependent residents within the project area as the Washington Alternative. Table 1-2 provides an overview of the transit dependent populations within a half mile of each alternative.

Table 1-2. 2018 Transit Dependent Populations

Transit Dependent Category	Project Area		SR 60 Alternative		Washington Alternative		Combined Alternative	
	# of People or Households	Percent within Study Area	# of People or Households	Percent within ½-Mile	# of People or Households	Percent within ½-Mile	# of People or Households	Percent within ½-Mile
Age 18 and under	156,431	22%	19,136	11%	37,516	22%	51,974	21%
Age 65 and over	85,806	12%	15,658	9%	19,414	11%	32,140	13%
Low-Income Households	72,082	37%	9,534	34%	16,322	36%	23,584	35%

Source: American Community Survey (ACS), 2017 and SCAG 2016 RTP/Sustainable Communities Strategy (SCS); CDM/AECOM JV, 2019.
Note: (1)People or households with Study Area boundary. (2) People or households within ½-mile buffer of alternative alignment.

1.8 Project Background

Planning for the Project began in 2007, with the preparation of an Alternatives Analysis (AA). A Draft EIS/EIR was circulated for public review on August 22, 2014. Since that time, changes to the alternatives have occurred and additional studies have been conducted, including the 2017 Post Draft EIS/EIR Technical Study. Most recently, Metro reinitiated the environmental review process for the project in 2019, which involves the preparation of a Supplemental/Recirculated Draft EIS/EIR in accordance with the requirements of CEQA and NEPA and advanced conceptual engineering. The previous analyses are summarized below.

1.8.1 2009 Alternatives Analysis

The Project AA was initiated in 2007 wherein 47 alternatives were evaluated. Metro conducted more than 100 meetings and briefings during the AA phase. In January 2009, the Metro Board approved the AA and identified two Build Alternatives to be carried forward for environmental review, considering the stakeholder input received.

1.8.2 2014 Draft Environmental Impact Statement/Environmental Impact Report

A Notice of Intent (NOI) to prepare a Draft EIS/EIR was issued in 2010. The Draft EIS/EIR analyzed the two alternatives, SR 60 and Washington Boulevard, in addition to the No Build and Transportation Systems Management (TSM) Alternatives. A total of 24 agencies accepted the invitation to become a Participating Agency. The United States Environmental Protection Agency (EPA), United States Army Corps of Engineers (USACE), and California Department of Transportation (Caltrans) (as assigned by the Federal Highway Administration [FHWA]) requested to be Cooperating Agencies. Outreach efforts to agencies affiliated with the Project included agency scoping meetings, participation in the Technical Advisory Committee (TAC), and 37 individual agency coordination meetings with EPA, USACE, Caltrans, Southern California Edison (SCE), and Union Pacific Railroad (UPRR). As part of the outreach during the Draft EIS/EIR phase, Metro also held approximately 330 meetings and briefings with a wide array of stakeholder groups. To address technical issues regarding proximity to the OII Superfund site and in close coordination with the EPA, a design variation was added to avoid the OIII Superfund Site.

The Draft EIS/EIR was released on August 22, 2014 for a public comment period of 60 days. Comment letters from the Cooperating Agencies—EPA, USACE and Caltrans—are included in **Appendix A** of this report, with a brief summary provided below:

- EPA provided comments on the 2014 Draft EIS/EIR related to potential constructability and safety challenges with the SR 60 Alternative, including the proposed locations on or near the OII Superfund site, issues with construction and operation on or near the OII site, release of hazardous materials, structural issues, steep slope of the South Parcel of the OII site. EPA requested Metro to identify additional structural engineering, and safety commitments in order to demonstrate that this alternative is feasible, uncertainties regarding the limits and characteristics of waste, landfill gas concentrations, groundwater conditions, protection of the monocover remedy, slope stability and erosion controls, site access and security, and prevention of damage to wells and pipelines, in the vicinity of the OII site.

- USACE comments on the 2014 Draft EIS/EIR included a number of concerns regarding the SR 60 Alternative. Specifically, USACE was concerned about the alignment and station being sited in the Whittier Narrows Dam Basin, including the potential safety risks of locating transit facilities within a flood basin. USACE also noted that the Washington Alternative might be considered a practicable alternative outside a floodplain per Executive Order 11988.

- Caltrans provided eighteen comments on the 2014 Draft EIS/EIR, 14 of which refer directly to the SR 60 Alternative impacts and requirements regarding the extensive process for the encroachment permit, potential traffic and congestion impacts on freeway on/off ramps and nearby streets including near the proposed stations, potential aesthetic impacts, future Caltrans plans to widen the SR 60 and related ROW concerns, additional Caltrans projects including the Paramount Boulevard/SR 60 Interchange, non-standard existing facilities, long term lane closures, and community updates.

Based on the volume and scope of comments received on the 2014 Draft EIS/EIR, the Board deferred the selection of a Locally Preferred Alternative (LPA) and determined that additional technical investigation would be needed to address the major areas of concern raised by the Cooperating Agencies, corridor cities, and stakeholders for both Build Alternatives. For the SR 60 Alternative, this included addressing the adjacent SR 60 Freeway, increased ROW acquisitions due to Caltrans future expansion plans; the OII Superfund site; land use developments; SCE transmission lines; and Whittier Narrows Flood Control Basin. For the Washington Alternative, the Metro Board requested reevaluation of the Garfield Avenue aerial segment due to the substantial impacts and stakeholder opposition and directed staff to carry out additional technical work, including identifying a new north-south alignment to connect to the Washington Alternative.

1.8.3 2017 Post Draft EIS/EIR Technical Study

The 2017 Post Draft EIS/EIR Technical Study addressed issues identified in the November 2014 Board Motion, which the Metro Board of Directors deferred the selection of a Locally Preferred Alternative and determined that additional technical investigation would be needed to address major areas of concern raised by Cooperating Agencies, corridor cities and stakeholders.

The Washington Alternative was further studied to identify a new north-south connection. Garfield was studied further and compared to Arizona and Atlantic options in the. The Metro Board also directed

staff to explore the feasibility of operating both the SR 60 and Washington Alternatives as a Combined Alternative. Extensive coordination with Caltrans, EPA, USACE, California Department of Fish and Wildlife (CDFW) and SCE occurred throughout the technical investigation process on the design of the SR 60 Alternative to address the agencies' respective comments on the Draft EIS/EIR. Metro also held 120 community meetings and briefings during the 2017 Post Draft EIS/EIR Technical Study.

Some of the issues discussed with resource agencies and key stakeholders throughout the Post Draft EIS/EIR Technical Study included:

- Addressing concerns related to the OII Superfund site;
- Minimizing impacts to adjacent developments such as the Market Place in Monterey Park;
- Not precluding the ability to add high-occupancy vehicle (HOV) lanes to the SR 60 Freeway;
- Avoiding impacts to the on and off-ramps at Paramount Boulevard;
- Mitigating conflicts with SCE transmission lines; and
- Preserving the ability to develop a station and park and ride structure at Santa Anita Avenue located in the flood basin.

In May 2017, the Metro Board received the findings of the 2017 Post Draft EIS/EIR Technical Study and decided to advance the No Build Alternative and three Build Alternatives for environmental review: SR 60 Alternative, Washington Alternative, and the Combined Alternative.

1.8.4 New Metro Policies

Following the 2017 Post Draft EIS/EIR Technical Study, the Metro Board adopted new policies to address emerging transportation priorities, including equity, Transit-Oriented Communities (TOC) and First/Last Mile (FLM) planning, and parking. In June 2018, Metro's TOC Policy was adopted to promote places (such as corridors and neighborhoods) that, by design, allow people to drive less and access transit more. The TOC Policy sets the direction to guide Metro decision-making for projects and to assist local jurisdictions in maximizing the potential of transit investments in their communities. One important component of TOCs is better access to transit through strong FLM connections, helping connect riders to and from their ultimate destinations.

1.8.5 Reinitiated Environmental Review

FTA and Metro reinitiated the environmental review process for the Project in 2019. As part of this effort, FTA and Metro conducted a 45-day scoping period from May 31 to July 15, 2019. Scoping is the process of determining the scope, focus, and content of the environmental analysis.

FTA and Metro received approximately 300 comments during the scoping period. Approximately two-thirds of the comments referenced the Build Alternatives. A quarter of the comments referenced the Washington Alternative and over one-third of the comments referenced the SR 60 Alternative. An organized community group—Justice and Equality for the Eastside Coalition—obtained over 400 signatures from residents of the Via Campo neighborhood opposed to the current proposed

construction of an at grade and aerial portion of the SR 60 Alternative (**Appendix B** [Justice and Equality for the Eastside Coalition]). Community members and stakeholders were concerned with the negative health and quality of life impacts.

Agencies also provided input regarding the SR 60 Alternative, with Caltrans reaffirming that an encroachment permit would be required if the SR 60 Alternative operates within their right-of-way (ROW). By comparison, the Washington Alternative had support from communities, business groups and employers along the alignment. Although there was general support for the Alternatives, a considerable amount of comments received were in opposition of the SR 60 Alternative at-grade and aerial configuration. Comments received about the Washington Alternative were in support of the project and the alternative.

In addition to the scoping process, Metro has also conducted 67 stakeholder meetings and briefings from July 2018 to December 2019.

1.8.6 Advanced Design, Analysis and Outreach Efforts

Metro has continued to advance the design, analysis and outreach efforts for the Build Alternatives, including the SR 60 Alternative through the re-initiation of the environmental review process for the Project. This process has included coordination with Cooperating Agencies, key stakeholders and the community. In addition, Metro has incorporated current policies and programs related to TOC, FLM, equity, and parking into the overall project development process.

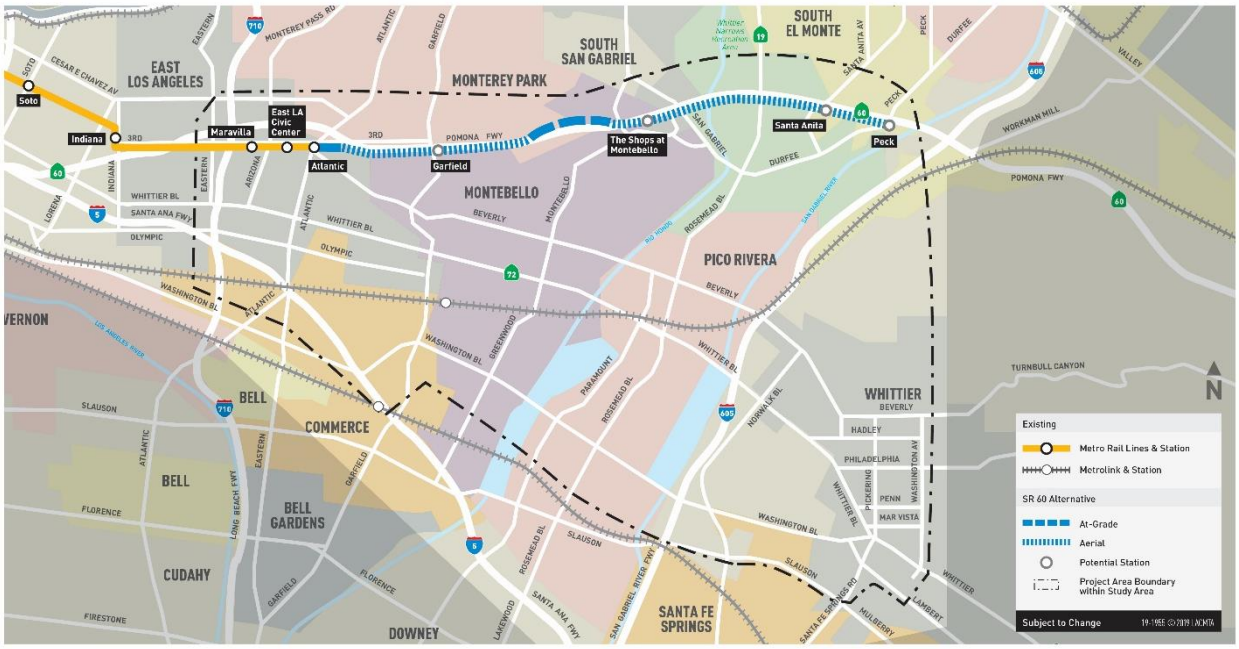
The advancement of the design, environmental analysis and additional stakeholder feedback have reinforced the ongoing challenges for the SR 60 Alternative and Combined Alternative. Metro has continued to work to resolve the technical design challenges. Through the additional analysis and advancing the engineering to 15 percent, the constraints and challenges associated with the SR 60 Alternative within or along the freeway corridor have become more evident. The Combined Alternative compounds these technical challenges by requiring the addition of a wye junction. This report documents the technical constraints, challenges and impacts of the SR 60 Alternative for the Project. The Metro Board of Directors will consider the technical findings and stakeholder input in determining the future direction of the SR 60 and Combined Alternatives in the overall project development process.

2 DESCRIPTION OF SR 60 AND COMBINED ALTERNATIVES

The SR 60 Alternative would extend the Metro Gold Line from the existing Atlantic Station approximately seven miles east to the city of South El Monte (Figure 2-1). Since the 2014 Draft EIS/EIR, the SR 60 Alternative guideway has been adjusted to address concerns and comments received from Cooperating Agencies. This alternative would be located primarily along the southern side of the SR 60 Freeway within or parallel to the Caltrans' ROW. The alignment would transition to the north side for a 1.5-mile section to avoid the OII Superfund Site in Monterey Park. It would have approximately six miles of aerial structure, one mile of at-grade alignment, four aerial stations, a MSF, and other ancillary facilities.

The Combined Alternative carries the same design constraints and challenges as the SR 60 Alternative but includes additional challenges due to the wye junction.

Figure 2-1. SR 60 Alternative



Source: Metro; CDM Smith/AECOM JV, 2019.

2.1 Guideway Alignment

The SR 60 Alternative alignment would head east from the existing Metro Gold Line Atlantic Station, running at-grade in the median of Pomona Boulevard. It would transition from at-grade to an aerial structure mid-block between Hillview Avenue and Sadler Avenue, permanently closing cross traffic on Sadler Avenue. The alignment would then run on an aerial structure primarily within or parallel to the south side of the SR 60 Freeway ROW from Pomona Boulevard to approximately Greenwood Avenue.

The proposed alignment would transition to the north side of the SR 60 Freeway west of Greenwood Avenue on a long span bridge to avoid the OII Superfund Site, then continue east within or parallel to the SR 60 Freeway ROW primarily in an at-grade configuration. It would then return to the south side of the SR 60 Freeway near Paramount Boulevard, crossing back over the SR 60 Freeway on another long span bridge near The Shops at Montebello. The alignment would then continue east on an aerial structure within or parallel to the south side of the SR 60 Freeway ROW, terminating near Peck Road in the city of South El Monte.

An MSF, traction power substations (TPSS), track crossovers, emergency generators, train control enclosures, and other ancillary facilities that provide power and help to operate the LRT would also be constructed as part of the SR 60 Alternative.

2.2 Operating Hours and Frequency

The SR 60 Alternative would provide LRT service from South El Monte through downtown Los Angeles to Santa Monica. The operating hours and schedules for the SR 60 Alternative would be comparable to the weekday, Saturday and Sunday, and holiday schedules for the existing Metro Gold Line (effective December 16, 2018). Trains would operate every day from 4:00 AM to 1:30 AM. On weekdays, trains would operate every 5 minutes during peak hours, every 10 minutes mid-day and until 8:00 PM, and every 15 minutes in the early morning and after 8:00 PM. On weekends, trains would operate every 10 minutes from 9:00 AM to 6:30 PM, every 15 minutes from 7:00 AM to 9:00 AM and 6:30 PM to 7:30 PM, and every 20 minutes before 7:00 AM and after 7:30 PM.

The Combined Alternative would not achieve similar frequencies. See **Section 3.7** for more details.

2.3 Proposed Stations

The SR 60 Alternative include four aerial, center platform stations. It is anticipated that property acquisitions would be needed to accommodate the stations and related facilities. Station parking demands are presently being evaluated based on Metro's Supportive Transit Parking Program Master Plan (STPP) which is under development. The proposed station locations and parking for the SR 60 Alternative would be as follows:

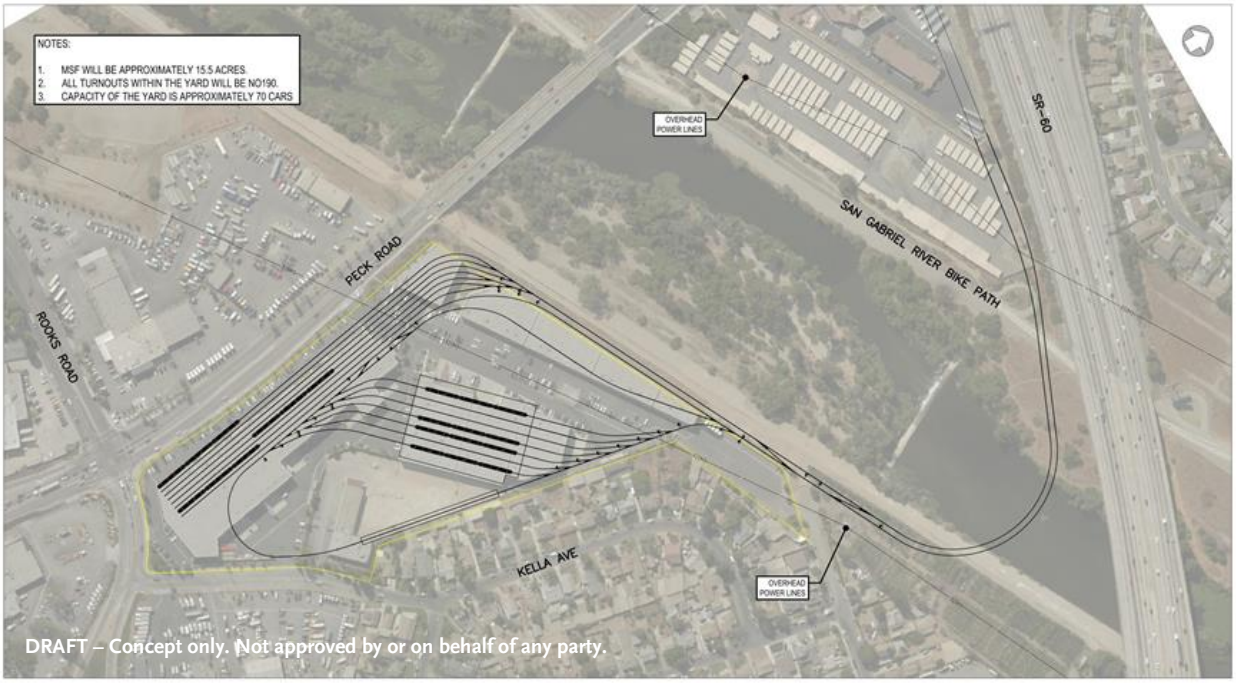
- **Garfield Avenue** – East of Garfield Avenue on the SR 60 Freeway ROW along Via Campo Street in the city of Montebello. This station would provide surface parking spaces located at Via Campo Street and Garfield Avenue.
- **The Shops at Montebello** – Within the SR 60 Freeway ROW along the west side of The Shops at Montebello in the city of Montebello. This station would provide surface parking spaces located at Town Center Drive and Montebello Town Center.
- **Santa Anita Avenue** – East of Santa Anita Avenue on USACE property in the city of South El Monte. In order to address USACE concerns regarding the flood control basin, this station and parking facility would need to be elevated above the basin. The station includes a parking structure located between Santa Anita Avenue and Lexington-Gallatin Road.
- **Peck Road** – East of Peck Road and south of the SR 60 Freeway in the city of South El Monte. Parking demand is closely being analyzed at Peck Road since it's an end of line station. End of

line stations typically creates high demand of parking subsequently resulting in a parking structure or extensive property acquisitions to accommodate surface parking.

2.4 Maintenance and Storage Facility

An MSF is required for all alternatives considered. Repeated efforts to locate an appropriate MSF site along the SR 60 Alternative are challenged by the need to avoid the OII Superfund site, the presence of the SR 60 Freeway including access and egress facilities, and a general lack of suitably sized and located sites. It was finally determined that the SR 60 Alternative would have an MSF located at the end-of-line, southeast of Peck Road and the San Gabriel River partially within the city of Industry and partially in unincorporated Los Angeles County. As shown on Figure 2-2 the SR 60 MSF site is approximately 15.5 acres in size, bounded by Peck Road, Rooks Road, and the San Gabriel River. The facility would accommodate storage for approximately 70 light rail vehicles (LRVs) however, the SR 60 Alternative requires space for 100 to120 LRVs. The non-revenue lead tracks are approximately a half mile in length and would approach from the proposed Peck Road station on a structure over the San Gabriel River that would need to cross under an existing SCE corridor.

Figure 2-2. Draft SR 60 Maintenance and Storage Facility



Source: Metro; Cordoba/HNTB JV, 2019.

The Combined Alternative explores the potential build out and operation of both the SR 60 and Washington Alternatives. The Combined Alternative would allow service from South El Monte and Whittier to downtown Los Angeles and the regional transit network and would also provide a one-seat ride allowing for connection between South El Monte and Whittier in a "C" configuration via a wye junction (i.e., three-way junction). Specifically, the Combined Alternative would include a wye junction in the East Los Angeles area near the Via Campo neighborhood, that would connect the SR 60 and Washington Alternatives, allowing alternating train movements between both lines.

The Combined Alternative and wye junction would have impacts related to operations, cost, and property acquisitions and construction in the East Los Angeles community near the Via Campo neighborhood that would be additive to the impacts of the SR 60 and Washington Alternatives. These additional impacts are described in Section 3.7.

3 DESIGN CONSTRAINTS AND CHALLENGES

The design constraints and challenges of the SR 60 Alternative and Combined Alternative can be summarized and categorized into the following items:

- Caltrans coordination on future widening and encroachment permit
- Conflicts with OII Superfund Site
- SCE conflicts
- MSF site limitations
- Changes in land use and Caltrans' facilities since 2014
- Impact on implementation schedule

As described in Section 2 (Description of SR 60 Alternative), the proposed SR 60 Alternative alignment would run adjacent to the SR 60 Freeway within or parallel to the Caltrans' ROW. For most of the corridor, the SR 60 Freeway is on a fill section with the embankment area sloped to either side towards frontage roads. This is a highly constrained area, which is targeted for future freeway expansion by Caltrans. Various other physical design constraints within the corridor include major utilities, residential land uses, and MSF site limitations (described above in Section 2.4). The features physically constraining the design of the SR 60 Alternative are described below.

As mentioned in Section 2, the Combined Alternative carries the same design constraints and challenges as the SR 60 Alternative but includes substantial challenges because of the wye junction.

While this report focuses primarily on the SR 60 and Combined Alternatives issues and constraints, the Washington Alternative does have its challenges, however these challenges are not as complex relative to those for the SR 60 and Combined Alternatives. The focused technical analysis for the Washington Alternative included the evaluation of the underground section; design variations at Rosemead and 605 freeway; and the bridge crossings. The bridge crossings would require standard Section 404 and 408 permitting processes. In particular, the design variations and bridge crossing challenges are being resolved within the project's predetermined timeline for environmental clearance.

The Washington Alternative includes an underground tunnel otherwise not present in the SR 60 Alternative. The tunnel is approximately 3 miles long. The project team would need to identify Tunnel Boring Machine (TBM) launching and extracting sites. These sites require approximately 3-4 acres for launch and 1-2 acres for extraction. Early community engagement in 2017 about this topic was discussed, and a consensus was reached that the TBM would be launched from the south in the City of Commerce and extracted in the north. Another associated challenge with the underground section of the Washington Alternative is its potential costs as tunneling is expensive. Capital costs will be developed as design progresses. However, initial operating segments (IOS) will be required as part of the Washington Alternative.

Property acquisitions are required for project elements such as an MSF site, stations, parking and TPSS sites. Light rail projects typically include these elements; however, the Washington Alternative

provides more options and flexibility than the SR 60 Alternative to minimize impacts and has fewer design constraints avoiding Caltrans ROW, major utility corridors, and federally protected resources.

3.1 SR 60 Freeway Widening

Metro has continually engaged Caltrans regarding the SR 60 Alternative since the LRT would run primarily within the existing freeway ROW. In 2014, Metro received a comment letter from Caltrans in response to the 2014 Draft EIS/EIR. The following comment was provided:

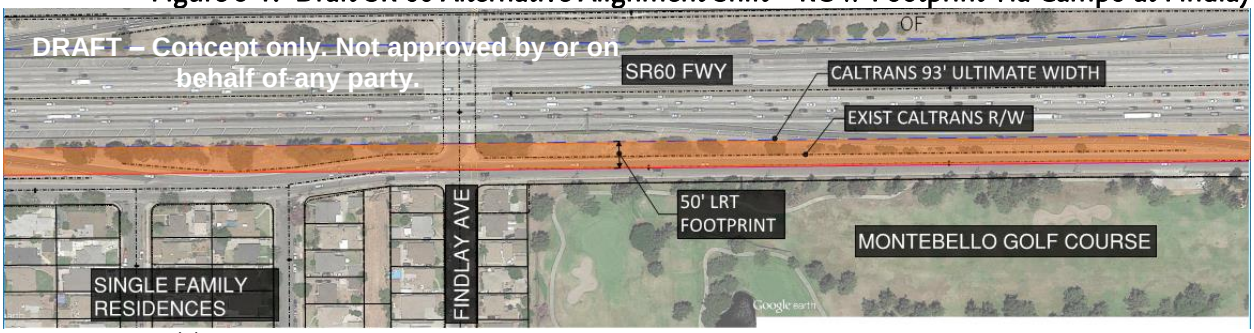
- "Taking the existing SR 60 highway ROW for the Eastside Transit Corridor Phase 2 Project would severely limit the possibility of expanding, widening, or making improvements to our facility, a critical freeway corridor. In the future, should the SR-60 roadway be needed to be widened, and with the Eastside 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."

In subsequent meetings that took place in 2019, Caltrans underscored that the SR 60 Alternative will impact Caltrans' ability for future widening which would bring existing general-purpose lanes up to Caltrans current standards and add High-Occupancy-Vehicle lanes. Caltrans' future plan for the SR 60 Freeway would result in shifting the SR 60 Alternative aerial guideway out of the Caltrans ROW. Based on Caltrans planned criteria for the freeway, an approximate 93-foot buffer was agreed upon as sufficient ROW to accommodate future improvements. The 93-foot buffer is conceptual and would require Caltrans approval upon submittal of the Advanced Conceptual Engineering drawings.

The alignment shift would further impact adjacent residential and environmentally sensitive areas including the Via Campo Community, Montebello, Whittier Narrows Recreation Area, South El Monte High School, and SR 60/Peck Road Interchange. In addition to the impacts to these areas, the Project would require additional property acquisitions and extensive permit coordination with regulatory resource agencies such as USACE and Los Angeles County Flood Control District (LACFCD). An encroachment permit would still be required by Caltrans despite the guideway not being entirely in Caltrans ROW. These additional impacts and requirements could potentially add several years of delay to the overall schedule.

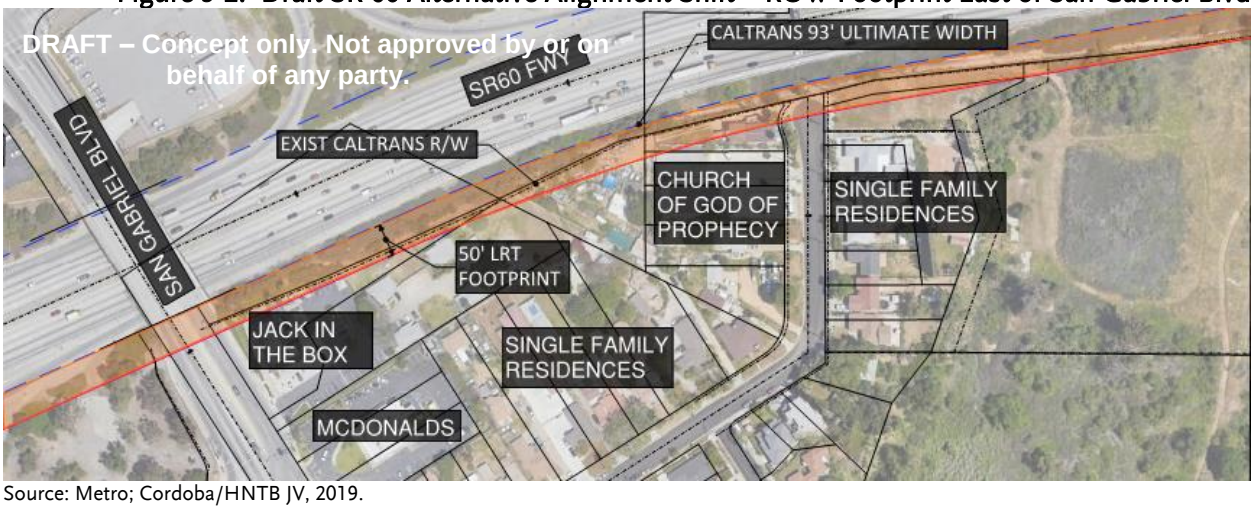
The guideway shift that would be required for Caltrans' future expansion is delineated by the orange footprint shown on Figure 3-1 through Figure 3-5. The alignment shift below is conceptual and would require Caltrans coordination and approval. As shown, the SR 60 Alternative alignment shift would further impact adjacent roadways, residential areas, community facilities, and other environmentally-protected resources such as the Whittier Narrows Recreational Area.

Figure 3-1. Draft SR 60 Alternative Alignment Shift—ROW Footprint Via Campo at Findlay



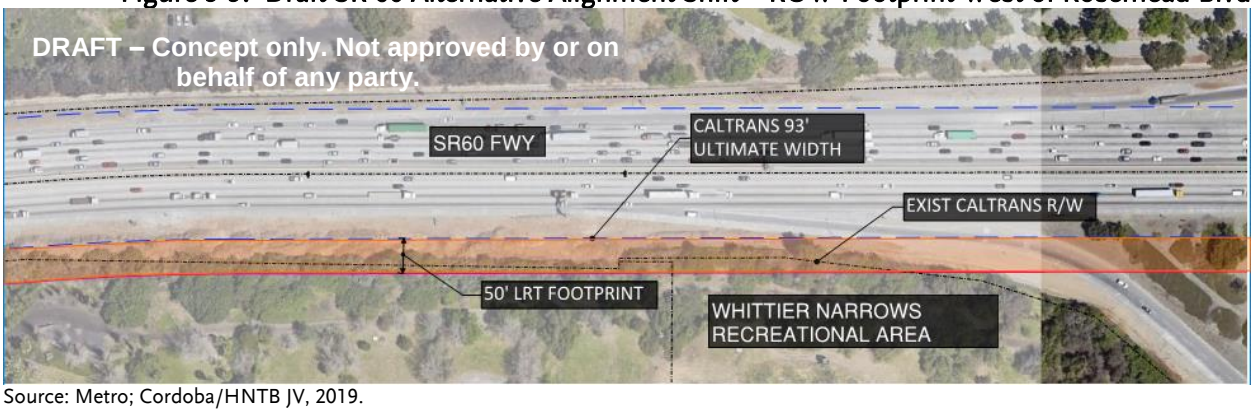
Source: Metro; Cordoba/HNTB JV, 2019.

Figure 3-2. Draft SR 60 Alternative Alignment Shift—ROW Footprint East of San Gabriel Blvd



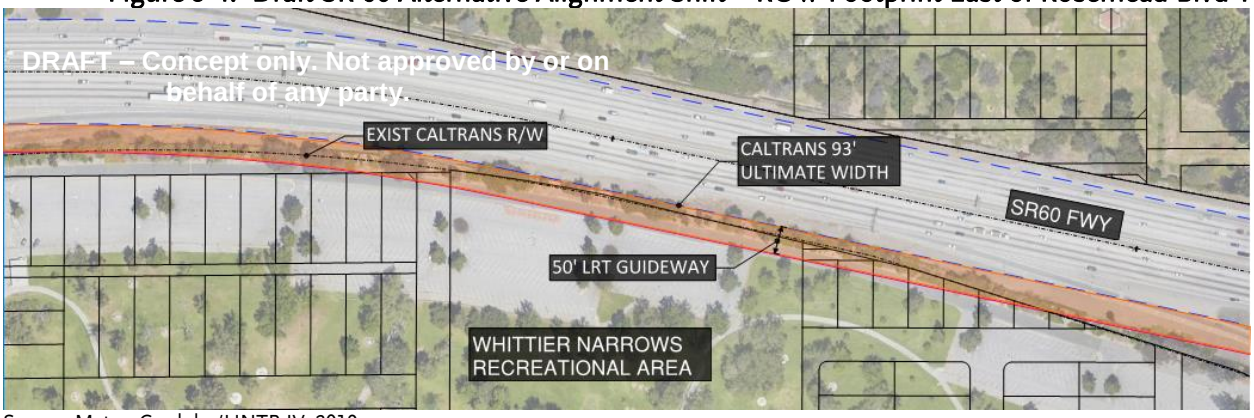
Source: Metro; Cordoba/HNTB JV, 2019.

Figure 3-3. Draft SR 60 Alternative Alignment Shift—ROW Footprint West of Rosemead Blvd



Source: Metro; Cordoba/HNTB JV, 2019.

Figure 3-4. Draft SR 60 Alternative Alignment Shift—ROW Footprint East of Rosemead Blvd 1



Source: Metro; Cordoba/HNTB JV, 2019.

Figure 3-5. Draft SR 60 Alternative Alignment Shift—ROW Footprint East of Rosemead Blvd 2

Source: Metro; Cordoba/HNTB JV, 2019.

3.2 Encroachment Permit Requirements

A major constraint for the SR 60 Alternative is the requirement for a Lateral Encroachment Permit from Caltrans District 7 for the areas of the LRT guideway that are proposed to be within Caltrans' ROW (partially or fully). Excerpt from comment received by Caltrans is as follows:

- *"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 with construction..."*

Typically, encroachments are proposed perpendicular to Caltrans' ROW to minimize the amount of overlap. However, with a 6.9-mile alignment weaving in and out of Caltrans' ROW, it poses a substantial challenge for Metro in gaining approval from Caltrans. These types of Lateral Encroachment Permits are unconventional within the Caltrans' permitting process possibly adding years to the overall Project schedule. Continual coordination and extensive reviews to gain approval from Caltrans District 7 would create risks and delays to the Project.

3.3 Freeway Bridge Span Geometrics

To avoid disturbance of contaminated materials found in the OII Superfund site, the guideway would need to transition to the north side of the SR 60 Freeway west of Greenwood then returning to the south side of the freeway west of Paramount Boulevard. The transitions between the north and south sides of the freeway would require two bridge spans across the freeway. Caltrans also raised concerns that the 2014 design which included column support placement in the median of freeway was not acceptable.

Caltrans comments regarding this proposed design in the median are listed below:

- *"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." and*
- *"The median does not appear wide enough to accommodate the columns for the SR-60 North Side Design Variation" (referred to in this report as the SR 60 Alternative)*

To address these comments, the project team completed a focused technical evaluation of alternative bridge options and alignments to cross the freeway. The focused technical evaluation concluded that a clear-span option (i.e., avoiding a column in the median of the freeway) is feasible to address Caltrans' concerns. The proposed clear-span bridges would require a wider deck and deeper structures to allow for future widening of the SR 60 Freeway to the planned ultimate width. However, the curve radius for the alignment across these bridge spans would reduce operating speeds from 55 mph to about 25 to 30 mph for the proposed LRT. The proposed clear-bridge spans do not meet the maximum operating speeds as designed per Metro Rail Design Criteria (MRDC).

3.4 Peck Road Station and SR 60/I-605 Interchange Improvements

Since 2014, Caltrans and Metro have been advancing improvement projects along the SR 60 Freeway into preliminary design geometrics and environmental review. The I-605 Corridor Improvement Project includes enhancements at Peck Road and the SR 60/I-605 Interchange that is currently in the environmental review process. The proposed improvements at Peck Road and the SR 60/I-605 Interchange pose additional design challenges for the SR 60 Alternative that were not present in 2014. A recently built three-story condominium complex next to the Peck Road freeway ramp would be impacted as a result of the proposed ramp widening and relocation of the aerial guideway further south. The Peck Road station is also impacted by the SR 60/I-605 Interchange enhancements design constraints are described in Section 3.4**.**

Peck Road station is the proposed end-of-line station for the SR 60 Alternative. Since 2014, the Peck Road station design has been revised to address concerns from city of South El Monte to preserve businesses near the station and address conflicts with SCE transmission line clearances. Since 2017, Caltrans and Metro have started to design enhancements at the SR 60/I-605 Interchange, including freeway widening and new ramp configurations, which is currently in the environmental clearance phase.

Technical evaluation and design options were developed for the guideway and station to include the interchange improvements. The evaluation studied column placement for the aerial station and

guideway in context with existing and future planned roadways, ramps, bridges, property access, and the existing SCE high-voltage overhead transmission lines to the east.

Since 2014, the Project design efforts have incorporated the planned SR 60/I-605 Interchange improvements to minimize impacts to the immediate area. A portion of the current design of the LRT guideway shares a common project footprint with the Peck Road off-ramp improvements (displayed in Figure 3-6 below). This proposed design of the LRT guideway would be subject to Caltrans approval and places the guideway within approximately 5 feet of the residential condominiums adjacent to the freeway ramp. The Encroachment Permit process required by Caltrans, typically does not allow for projects to extend laterally within their facilities and may require redesign of the guideway. Should Caltrans not approve the design, the guideway would need to provide clearance for the off-ramps placing the guideway farther south, heightening the impacts to the condominiums.

Figure 3-6. Peck Road Station Placement

Source: Metro; Cordoba/HNTB JV, 2019.

The following is a summary of constraints and considerations at the terminus segment of the Project:

- Potential acquisition or impacts to 117 condominiums units, west of the interchange to provide the ROW that Caltrans' requires. In order to accommodate the future widening of the freeway and realigned Peck Road off-ramp, the LRT guideway was shifted further to the south near the condominium units. The proposed design may not be approved by Caltrans resulting in further real estate impacts and acquisitions.

- SCE high-voltage transmission lines do not meet minimum vertical clearances from the track extension to the SR 60 MSF and would have to be raised approximately 50 feet, which would increase cost;

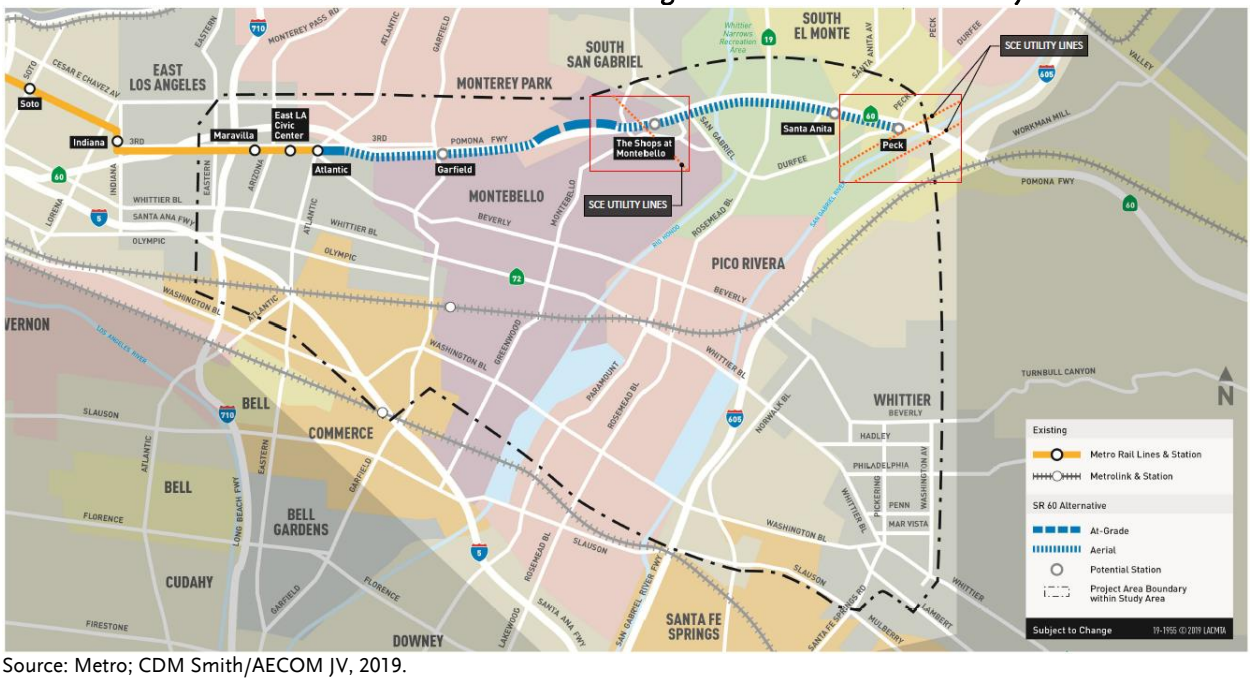
- The track extension to the SR 60 MSF crosses the San Gabriel River downstream of SR 60 Freeway, and a new LRT bridge would have to be constructed across the San Gabriel River impacting another water resource, requiring additional coordination and permits from USACE and the State of California;
- Concerns raised by the city of South El Monte regarding impacts to existing businesses at the SR 60/Peck Road Interchange; and
- The above-mentioned physical constraints limit the placement of a track crossover before the station platform, requiring another undesirable design deviation from MRDC.

3.5 SCE Utility Corridor Conflicts

The 2017 Post Draft EIS/EIR study attempted to address SCE utility concerns regarding conflicts between transmission lines and the guideway. There are three conflict areas along the SR 60 Alternative that would require raising the transmission lines approximately 50 feet to provide sufficient vertical clearance for the guideway, as shown on Figure 3-7:

- SR 60/Paramount Boulevard Interchange
- Peck Road station
- San Gabriel River

Figure 3-7. Potential SCE Utility Corridor Conflicts



Source: Metro; CDM Smith/AECOM JV, 2019.

The SCE utility crossing at the SR 60/Paramount Boulevard Interchange presents conflicts with the proposed bridge crossing. Considerable design efforts were examined to potentially avoid raising all

SCE transmission lines along the utility corridor to achieve vertical clearance. Subsequently, bridge design refinements were made that resulted in raising fewer transmission lines; however, conflicts still occur at this location.

SCE transmission lines also conflict with SR 60 MSF lead track connections from Peck Road station at Peck Road and the San Gabriel River. The non-revenue track traversing the utility corridors would require raising the transmission lines on both sides of the river.

Since the 2017 Post Draft EIS/EIR study, Metro has further refined the track alignment in an attempt to meet MRDC and help avoid encroachment of the guideway into the SCE utility corridor. Despite the design refinements incorporated in the current study, two of the three transmission line conflicts cannot be avoided and would still require raising transmission lines or modifying utility corridors.

3.6 Constrained Maintenance and Storage Facility

An MSF would need to be identified for each alternative and potential initial operating segments to serve rail operational functions and demands. Metro Operations' regional needs are being met through this project based on the Fleet Management Plan. The plan establishes a need for an MSF site that can accommodate 100 to 120 LRV storage capacity and required operational elements therefore requiring a site approximately 20 acres in size. Identifying an MSF site along the SR 60 Freeway is limited largely due to the surrounding land uses, including the SR 60 Freeway, the OII Superfund site, the Whittier Narrows Flood Control Basin, and residential and recreational areas. In 2014, two potentially feasible sites at the end of the line were identified, neither of which were optimal to serve the alignment, as there is no mid-line access to maintenance or storage.

In this current phase of work, the two sites identified in 2014 were examined; only one site remains feasible to meet Metro's operational requirements. The site is located at the end-of-line near Peck Road, partially within the city of Industry and unincorporated Los Angeles County (Figure 2-2).

The proposed SR 60 MSF is a small site, approximately 15.5 acres in size, with a storage capacity of approximately 70 LRVs. This is less than would be required for the regional needs, which would require close to 100 to 120 LRVs.

The non-revenue lead tracks would extend beyond the proposed terminus, Peck Road station, in an aerial configuration approximately a half-mile. The lead tracks would cross over the San Gabriel River and the San Gabriel River Trail/Bike Path in an aerial configuration. The elevated structure would conflict with SCE overhead transmission lines, which would have insufficient vertical clearance. In addition, an easement from SCE would be required, including through the middle of the MSF site option.

The stub end storage tracks and constrained MSF site make the facility less functional than desired for Metro's operations and maintenance. The end-of-the-line SR 60 MSF could create challenges in planning and determining an initial operating segment.

The SR 60 MSF site impacts the San Gabriel River Trail/Bike Path, the San Gabriel River, and SCE utility transmission lines. Further, the size limitations of the site may not fully accommodate the required program elements per Metro Operations.

The following is a summary of the constraints associated with the SR 60 MSF site:

- Smaller 15.5-acre site allows 70 LRV storage capacity, which does not accommodate 2042 forecast year fleet size of 100-120 LRV;
- Does not accommodate a full Operations and Maintenance Facility program, including Maintenance of Way, because of site constraints and adjacent sensitive receptors;
- Metro would need to study other site locations outside of this corridor to accommodate the balance of the forecasted fleet requirements if the SR 60 Alternative is the only alignment selected with the proposed MSF location;
- Connection to the only available MSF site requires a half-mile of non-revenue track across the San Gabriel River to reach the facility;
- Lead tracks extend beyond Peck Road station on elevated structure under SCE transmission lines across San Gabriel River to MSF site, which has insufficient clearance;
- SCE transmission line easement continues through west side of proposed SR 60 MSF site, which would require an easement from the SCE; and
- Stub end storage track site is very constrained and less functional than desired due to operations and maintenance needs.

If the SR 60 MSF site is not deemed practical, project implementation could be at risk as it does not appear possible to find another workable site near the SR 60 Alternative alignment.

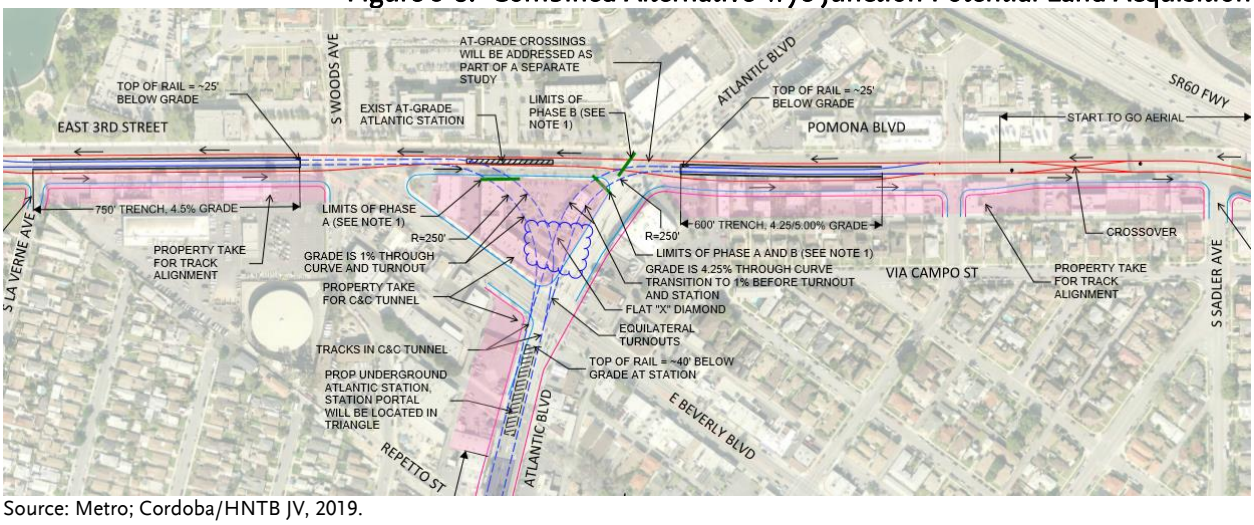
3.7 Combined Alternative Constraints

The Combined Alternative includes the potential build out and operation of both the SR 60 and Washington Alternatives allowing service from South El Monte and Whittier through downtown Los Angeles to Santa Monica. The Combined Alterative would require infrastructure and operational elements that would not otherwise be required if only one of the alternatives was constructed and operated as a "stand alone" line.

Through the construction of the wye junction, the Combined Alternative would also allow for a one-seat ride connection between South El Monte and Whittier in a "C" configuration. The two alternatives have different alignments and therefore, the wye junction would be required.

The wye junction is located in unincorporated East Los Angeles County. More specifically the wye junction would be located at the intersection of Atlantic Boulevard/3rd Street/Pomona Boulevard in the Via Campo neighborhood and would require additional property acquisitions from La Verne Avenue to Sadler Avenue. The approximately 2/3-mile stretch would require acquisition of the whole first row of mostly commercial properties along the south side of 3rd Street/Pomona Blvd for the construction of the wye junction as part of the Combined Alternative. Figure 3-8 displays the potential wye junction acquisition needs.

Figure 3-8. Combined Alternative Wye Junction Potential Land Acquisition



Source: Metro; Cordoba/HNTB JV, 2019.

As a stand-alone element, incorporating the Combined Alternative would add approximately $1.3-1.7 billion to the project capital cost for the wye junction. Although the Combined Alternative would allow for the third service line between South El Monte and Whittier, allowing train movements between both lines, the projected ridership for this line is relatively low and does not support the connection to and from South El Monte and Whittier.

According to the Combined Alternatives Junction Design and Rail Operations Study, five minute headways are required for light rail transit projects, per MRDC. The findings of the operation plan are contingent on Metro Systems review. The Combined Alternative cannot support five minute headways without interlining the tracks. The operation of the wye junction to facilitate the South El Monte and Whittier one seat ride connection would require some patrons who desire to connect into the downtown Los Angeles area and the regional transit network to make a transfer at the Atlantic Station as every other train would operate in the "C" configuration between South El Monte and Whittier. The alternating route concept between lines could also create confusion for passengers.

Overall, the Combined Alternative includes the challenges and constraints along the SR 60 Alternative, and it introduces the wye junction which would require substantial out of direction travel for those traveling between South El Monte and Whittier. This configuration would require a transfer to connect to downtown Los Angeles and the regional transit network and would increase the cost and acquisitions.

4 ENVIROMENTAL IMPACTS

This section provides an overview of the environmental impacts associated with the SR 60 and Combined Alternatives that pose potential problems relative to project implementation. The environmental considerations include transportation; property acquisitions; geotechnical, subsurface, seismic, and hazardous materials; water resources; ecosystems and biological resources; and Section 4(f) resources.

These environmental resources were studied in 2014 and 2017, and further analysis was initiated in 2019. Efforts were made to identify appropriate mitigation measures to avoid and/or minimize impacts. However, the shift of the SR 60 Alternative alignment to accommodate the 93-foot ROW needs, as stipulated by Caltrans, would further impact these resources, and proposed mitigations may not reduce these impacts to a less than significant level. Further, the permitting processes associated with the federally-protected resources could potentially add several years to schedule.

The Washington Alternative avoids many of these sensitive resources and while it would require agency coordination and permitting, this alternative would not require the same level of permitting and associated schedule delays.

4.1 Pedestrian and Bicycle Circulation Impacts

The character of the SR 60 Freeway corridor is suburban with an auto-oriented street and highway network. Block sizes are less accommodating for pedestrians and bicycles and limit future pedestrian and bicycle infrastructure since they are scaled for vehicle traffic. Portions of the SR 60 Alternative corridor have little to no pedestrian and bicycle activity, given that the alignment is primarily located within or along the freeway ROW. The SR 60 Freeway poses a major barrier to pedestrian and bicycle access. Communities are restricted to crossing the freeway through pedestrian underpasses. Pedestrian and bicycle activity along this corridor are exposed to adjacent vehicular traffic undergoing high traffic speeds.

Although temporary, construction of the aerial guideway may require temporary closures of the Rio Hondo bike path and San Gabriel River Trail/Bike Path. This is discussed further under the Section 4(f) Resources section.

The Combined Alternative would have the same pedestrian and bicycle character as the SR 60 Alternative due to the freeway corridor.

4.2 Property Acquisitions

With the SR 60 Alternative alignment shift to accommodate the approximate 93-foot Caltrans ROW needs, full and partial property acquisitions would be required. The property acquisitions include sensitive land uses such as residential properties. The acquired properties would be used to accommodate the facilities for the Project, including the LRT guideway, TPSS units, stations, parking, and the MSF. It should be noted that the property acquisitions have not been confirmed and are subject to change at a later phase. Depending on the design outcomes stated in Section 3.1, the results could lead to impacts or full property acquisitions of the newly constructed 117

multi-family residential complex adjacent to the Peck Road interchange. The SR 60 Alternative would also require permanent easements within USACE, Caltrans SR 60 Freeway and SCE ROW.

The Combined Alternative would require additional property acquisitions due to the construction of a wye junction. These acquisitions would occur in East Los Angeles County near the Via Campo neighborhood.

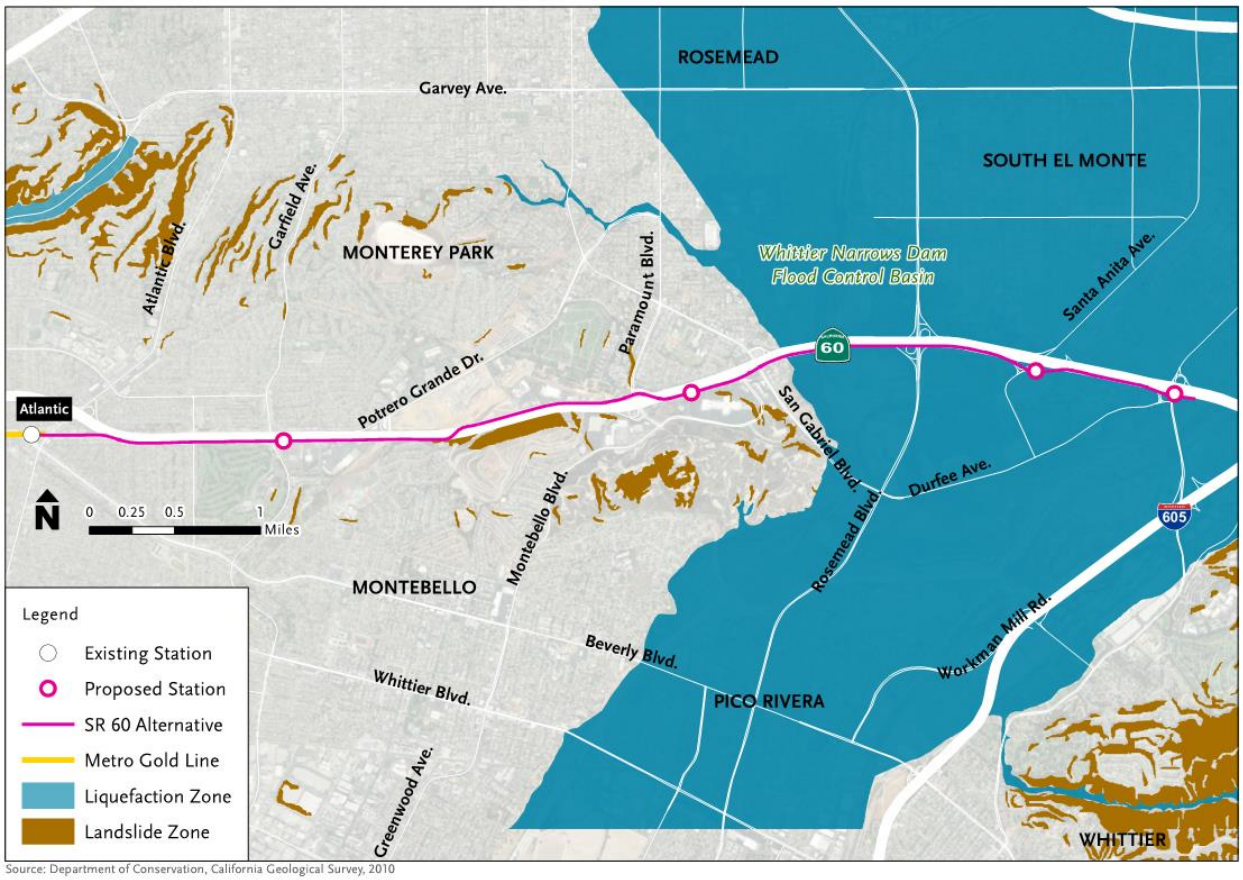
4.3 Geotechnical, Subsurface, Seismic, and Hazardous Materials

4.3.1 Seismic Hazards

The SR 60 Alternative traverses a seismically-induced landslide hazard zone, as shown on Figure 4-1. Ancient landslide deposits are mapped on the north-facing slope of the OII Superfund site, south of the SR 60 Freeway. These ancient landslide deposits pose a geotechnical hazard and slope stability risk. Therefore, the SR 60 Alternative has the potential for adverse impacts related to seismically induced landslides. The EPA has commented on their concerns about potential slope stability of the SR 60 Alternative on or near the OII Superfund site (landfill).

The Combined Alternative would also cross the seismically-induced landslide hazard zone. However, the landslide zone would be avoided by the Washington Alternative.

Figure 4-1. Liquefaction and Seismically-Induced Landslide Hazard Zone Map



Source: Department of Conservation, California Geological Survey, 2010

4.3.2 Hazardous Materials

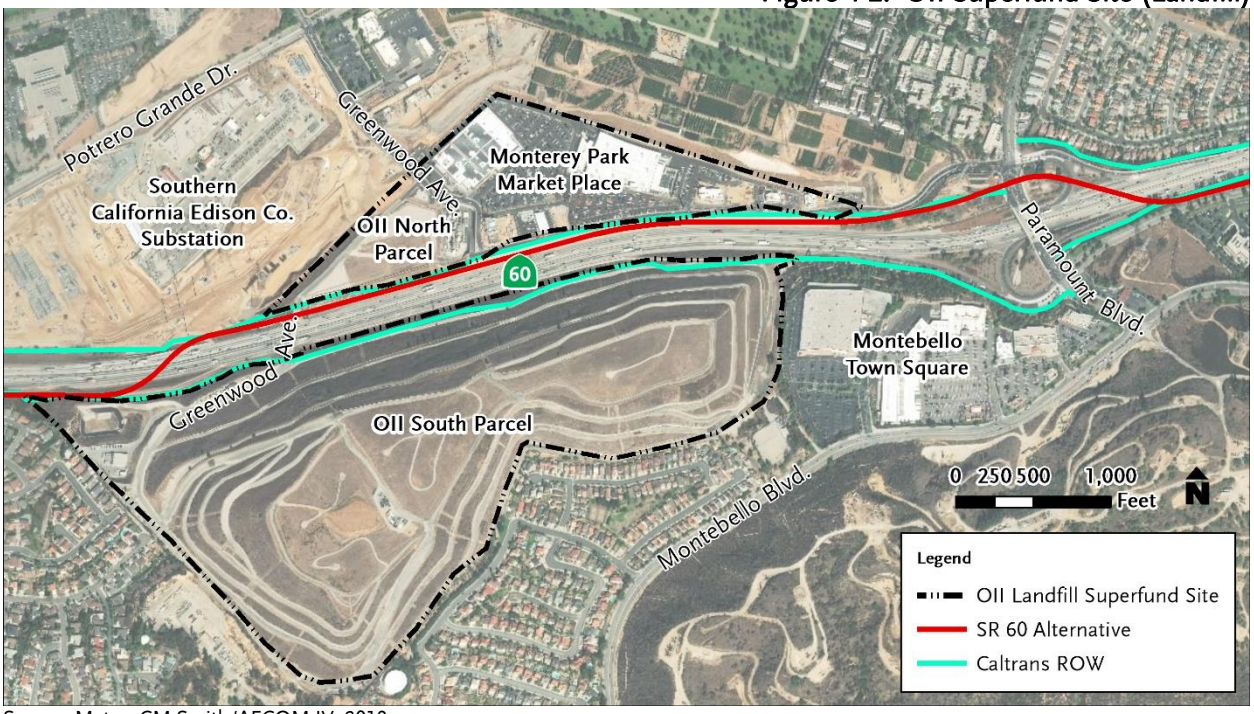
Potential hazardous materials could be encountered during construction of the SR 60 Alternative. The potential release of hazardous materials in contaminated soil and/or groundwater could result in exposure to workers, the public and sensitive receptors, such as schools within one-quarter mile. This could occur through the release of dust or vapors from exposed soil and/or groundwater.

Several hazardous materials sites have been identified in the area of the SR 60 Alternative alignment as having environmental contamination concerns, including:

- **OII Superfund Site (Landfill)** – The OII Superfund Site is an inactive landfill that is being remediated under the EPA Superfund program. The site is bisected by the SR 60 Freeway in both the OII North and South Parcels as delineated by the black dashed lines on Figure 4-2. A treatment facility is located on the North Parcel, and includes a leachate treatment plant, two landfill gas flares, and other supporting infrastructure. OII received approximately 38 million cubic yards of commercial and residential refuse, industrial solid and liquid wastes, and various hazardous wastes. Most of that material was placed in the OII South Parcel. The OII North Parcel received mainly construction and demolition waste. A 500,000 square-foot commercial shopping center, the Market Place, has been developed recently on the eastern, non-landfill, portion of the OII North Parcel.

  Since the 2014 Draft EIS/EIR and 2017 Post Draft EIS/EIR Technical Study, additional focused technical analyses have taken place to further study this area. In order to avoid the OII Superfund site, the SR 60 Alternative would need to transition approximately 1.5 miles of the guideway from the south side of the SR 60 Freeway to the north side. It is expected that the SR 60 Alternative guideway would be constructed mostly within the Caltrans SR 60 ROW on the north side but may straddle the OII North Parcel boundary line. In 1991, the EPA issued a consent decree for remedial activities that improved the condition of the North Parcel along the planned SR 60 Alternative alignment. The activities included the removal of landfill waste and aerially deposited lead (ADL) within an approximate 73-foot wide corridor parallel to the northern edge of SR 60 Freeway, which falls primarily within the Caltrans ROW. In addition, a "monocover" was constructed to cover the North Parcel. The EPA has commented on their concerns about potential impacts and constructability and safety challenges of the SR 60 Alternative on or near the OII Superfund Site, including landfill gas pathways, air leakage leading to underground fires, and potential to disturb landfill waste.

Figure 4-2. OII Superfund Site (Landfill)



Source: Metro; CM Smith/AECOM JV, 2019.

- **Montebello Oil Field and Gas Storage Facility** – The facility is located approximately 170 feet south of the SR 60 Freeway in the city of Montebello. Migration of subsurface gasses, such as methane and hydrogen sulfide, may be expected in excavations, not only within the oil field, but potentially in areas outside of the facility, as well. In addition, natural petroleum hydrocarbons may sometimes be encountered in oil bearing sediments in the vicinity of active oil fields.

- **San Gabriel Valley Superfund Sites** – A groundwater contamination plume underlies a large area of the San Gabriel Valley. The SR 60 Alternative alignment traverses over the plume approximately 2.5 miles from roughly San Gabriel Boulevard west to the alignment's eastern terminus at the San Gabriel River. The SR 60 Freeway separates two Superfund operable units (OUs) associated with San Gabriel Valley remediation: South El Monte OU to the north and the Whittier Narrows OU to the south. The planned SR 60 Alternative would be located along the Whittier Narrows OU on the south side of SR 60 Freeway.

The Combined Alternative would encounter these same superfund sites, but they would be avoided by the Washington Alternative. While construction of the Washington Alternative would require measures to avoid construction related release of materials (e.g., gas station tank removal, asbestos abatement) and address any potential impact resulting from the Omega Chemical Superfund Site, the Washington Alternative does not involve the challenges of building guideway within the superfund sites.

4.4 Water Resources

4.4.1 Floodplains and Surface Waters

4.4.1.1 Whittier Narrows Flood Control Basin

The SR 60 Alternative would be partially located in the Whittier Narrows Flood Control Basin, including the LRT guideway, Santa Anita Avenue station and the parking structure. A parking structure would be required at this station as opposed to surface park and ride facility due to the associated flood risks. Per the USACE, parking would not be permitted on the first floor to limit impacts due to the floodplain.

Construction of the SR 60 Alternative in the Whittier Narrows Flood Control Basin would modify the flood damage reduction structure, which is a federally-authorized flood damage reduction project of the Los Angeles County Drainage Area (LACDA). The SR 60 Alternative alignment would qualify as modifications beyond those required for normal operation and maintenance of the flood control basin and would require approval under Section 14 of the Rivers and Harbors Act (RHA) (33 U.S.C. § 408 [Section 408]). Approval of modifications to the flood control structures would require a risk analysis to evaluate potential impacts on the hydrologic and hydraulic functioning of the flood control system. This analysis would be completed as part of the Section 408 permit application submittal.

Within the Whittier Narrows Recreation Area, USACE owns 7 acres of the 28-acre area to the east of Santa Anita Avenue in the vicinity of the proposed Santa Anita Avenue station and maintains a flowage easement over the remaining 21 acres that are privately-owned. USACE Policy Guidance Letter No. 32, Use of Corps Reservoir Flowage Easement Lands, provides guidance on USACE's standards for approving developments on flowage easement lands. The exact language of the flowage easement would be central to USACE's evaluation of the proposed alternative to construct a station in this area.

Additionally, construction on privately-owned property in this area would require approval from the property owner. Coordination with and an encroachment permit from LACFCD may also be required as the LACFCD manages some of the drainage through the Whittier Narrows area. It is anticipated that the support structures for the aerial guideway through the Whittier Narrows Flood Control Basin and for the proposed Santa Anita Avenue station and parking structure would reduce the flood storage volume of the basin. In order to limit potential impacts from floodwaters, buildings would be elevated above the base flood elevation level and parking would only be allowed on the second floor and above.

4.4.1.2 River Crossings

If a column of the new bridge supporting the aerial guideway needs to be constructed below the ordinary high water mark (OHWM) or in an area defined as wetlands adjacent to the Rio Hondo River, this would be considered fill under Clean Water Act (CWA) 404. As such, a Section 404 permit for dredged or fill material and a Section 401 Water Quality Certification from the USACE would be required, along with a 1602 Streambed Alteration Agreement from the CDFW. The same would apply to the MSF lead tracks over the San Gabriel River since it is anticipated the SR 60 Alternative would require a new LRT bridge to be constructed over the river.

The Washington Alternative would have river crossings and associated permit requirements similar to the SR 60 and Combined Alternatives. However, the Washington Alternative would not encounter

the same complicated issues and impacts associated with traversing the Whittier Narrows Flood Control Basin.

4.4.2 Groundwater Quality

4.4.2.1 OII Superfund Site

Construction of the SR 60 Alternative would take place partly on a previously engineered slope that was part of the OII Superfund site. Due to the land use, the extent of contamination in the soil at this site is uncertain, and a clay monocover is in place to control landfill contaminants. Foundation support for the aerial structure adjacent to the landfill is anticipated to encounter refuse material and has the potential to adversely affect the quality of groundwater in the area due to toxic substances entering and polluting groundwater from the OII Superfund site.

Coordination with EPA would need to be ongoing during future design phases. If contaminated groundwater is encountered during construction, disposal would be required to comply with Waste Discharge Requirements (WDR) set by the Los Angeles Regional Water Quality Control Board (LARWQCB).

4.4.2.2 Whittier Narrows Recreation Area

The SR 60 Alternative would be constructed along the SR 60 Freeway ROW through the Whittier Narrows Recreation Area. This area is an important location for groundwater recharge. Compliance with the National Pollutant Discharge Elimination System (NPDES) General Construction Permit and post-construction BMPs would reduce stormwater and non-stormwater runoff from the construction site and from the project area following construction.

The Combined Alternative would have the same impacts as the SR 60 Alternative.

The Washington Alternative would avoid the potential water quality impacts associated with the OII Superfund site landfill and groundwater recharge issues associated with the Whittier Narrows Recreation Area.

4.5 Ecosystems and Biological Resources

4.5.1 Special-Status Species

The SR 60 Alternative and Combined Alternatives would potentially affect special-status species, including the California Gnatcatcher and Least Bell's Vireo. These special-status species are less likely to be encountered along the Washington Alternative.

4.5.1.1 California Gnatcatcher

California gnatcatchers have been observed nesting within coastal sage scrub habitat at the OII Site. While this species would not be expected to nest within the coastal sage scrub habitat due to the quality, mitigation measures would be implemented during construction in this area to avoid potential impacts. It should be noted that grading and other development activities located north of the SR 60 Freeway in this location have removed much of the coastal sage scrub habitat located in the proposed LRT alignment within the ROW.

4.5.1.2 Least Bell's Vireo

The most recently documented Least Bell's Vireo (LBV) nesting territory is located approximately 600 feet north of the SR 60 Freeway bridge over the Rio Hondo River. Installation of columns to support aerial LRT tracks and removal or trimming of riparian vegetation for equipment access would occur south of the bridge and outside of the current territory. However, LBV territories can change from year to year. If an LBV nesting territory is located near the SR 60 Freeway bridge, removal or trimming of vegetation and construction noise and activity could disturb nesting vireos. Mitigation to avoid or reduce impacts on this species would be required. The Combined Alternative would have the same impacts as the SR 60 Alternative.

4.6 Section 4(f) Resources

Section 4(f) of the U.S. Department of Transportation Act of 1966 (49 U.S.C. § 303, as amended) declares that special efforts be made to preserve the natural beauty of the countryside, public park and recreation lands, wildlife and waterfowl refuges, and historic sites of national, state, or local significance. Historic sites are afforded protection under Section 4(f) if listed or determined eligible for the National Register of Historic Places (NRHP). Section 4(f) permits the Secretary of Transportation to approve a project that requires the use of land from a significant publicly owned park, recreation area, or wildlife and waterfowl refuge, or any land from a historic site of national, state, or local significance only if the following determinations have been made:

- There is no feasible and prudent alternative to the use of such land; and
- All possible planning has been undertaken to minimize harm to the Section 4(f) lands resulting from such use.

The Washington Alternative would provide a feasible and prudent alternative to the Section 4(f) resources discussed below, including the Whittier Narrows Recreation Area. This availability of a feasible and prudent alternative could make Section 4(f) compliance challenging for the SR 60 Alternative. The Section 4(f) resources along the SR 60 and Combined Alternatives are discussed further in the following sections.

4.6.1 Whittier Narrows Recreation Area

The SR 60 Alternative includes an aerial structure that would run through the Whittier Narrows Recreation Area. The aerial structure would pass about 50 feet above the bike path along Rio Hondo River as part of the SR 60 Alternative. Construction of the aerial structure above the bike path could constitute a temporary occupancy under Section 4(f). If the bike path is temporarily re-routed during construction to allow it to remain open and it is restored to its original condition and location after construction, this temporary occupancy would not rise to the level of use (i.e., it would be considered a *de minimis* impact). Once completed, the new aerial structure would cast an additional shadow on the bike path. Since the viaduct would be immediately adjacent to the existing SR 60 Freeway overpass, it would be a comparatively minor extension of the already-shaded area. This additional shadow would not substantially impair features that qualify this resource for protection and would not constitute a constructive use. However, this finding would require concurrence from USACE, Caltrans, and the Los Angeles County Department of Parks and Recreation since all three agencies have jurisdiction in this area.

Another Section 4(f) resource at the Whittier Narrows Recreation Area includes the potential tree removals. The abundance of trees is one of the features that qualify Whittier Narrows Recreation Area for Section 4(f) protection. The SR 60 Alternative alignment would be adjacent to a parking lot. Both the parking lot and recreational areas contain trees that would shield the LRT facilities from view. The LRT alignment would be mostly shielded from the recreational areas of the park by the trees, views from the park would not be significantly altered, and no significant increase in noise beyond the existing freeway noise is anticipated. Tree removal may be needed to allow construction equipment to move between the trees, though trees within the park area would be replaced once the need for construction access has ended. If the duration of tree removal is brief, tree trimming is minimal, and the trees are replaced once activities have finished, this effect could be deemed a *de minimis* impact that may not rise to the level of constructive use under Section 4(f). The extent of tree removal and trimming will be confirmed during the preliminary engineering phase of the project and could be the deciding factor of whether a constructive use would occur. This finding would require concurrence from the USACE and the Los Angeles County Department of Parks and Recreation.

4.6.2 San Gabriel River Trail/Bike Path

The SR 60 Alternative would end just west of the trail/bike path along the San Gabriel River in South El Monte. However, lead tracks would continue east over the trail/bike path and San Gabriel River to get to the MSF site, as shown on Figure 2-2. Construction of the LRT aerial structure above the trail/bike path could constitute a temporary occupancy under Section 4(f) similar to the bike path along the Rio Hondo River discussed above. If the trail/bike path is temporarily re-routed around the construction area such that it remains open at all times and is restored to its original condition and location after construction, this temporary occupancy could be deemed a *de minimis* impact. This finding would require concurrence with the USACE, Caltrans, and the Los Angeles County Department of Parks and Recreation since all three agencies have jurisdiction in this area.

5 STAKEHOLDER AND COMMUNITY CONCERNS

Metro has conducted a very robust stakeholder and community outreach process since the inception of the Project in 2007. Most recently, Metro reinitiated the environmental review process for the Project with a 45-day scoping period in the summer of 2019. Metro received approximately 300 comments during the 2019 scoping period. A full compilation of the scoping process and comments received can be found in the Draft *Scoping Summary Report* (2019).

Approximately two-thirds of comments submitted during the 2019 Scoping period referenced the Build Alternatives. In general, there was some support for all three Build Alternatives. The major themes expressed by stakeholders in their comments included:

- Opposition to at-grade alignment on SR 60 Alternative from South Atlantic Boulevard to Findlay Avenue
- General support for Washington Alternative from communities, business groups and employers along the alignment
- Concerns raised over environmental justice and equal consideration for undergrounding in lower-income areas of the county

Over one-third of the comments referenced the SR 60 Alternative, which received the lowest amount of support from the public. Comments from stakeholders who reside or conduct business along the proposed SR 60 Alternative included:

- Justice and Equality for the Eastside Coalition opposes an at grade/aerial build for the SR 60 Alternative; they were concerned with the negative health and quality of life impacts. The coalition supports the Washington Alternative, but only if the Atlantic Boulevard portion is built fully underground. **Appendix B** contains the petition from the coalition that received over 400 signatures from the Via Campo neighborhood.
- Some stakeholder comments expressed opposition to the SR 60 Alternative, citing community/neighborhood impacts, noise and vibration impacts, air quality impacts and visual and aesthetic impacts.

A few stakeholders expressed support for additional bus service being added in the project area instead of moving forward with one of the Build Alternatives.

A total of 21 agencies submitted comments during the 2019 scoping period. Some agencies confirmed they wanted to participate in the environmental review process, while others submitted more detailed comments on the alternatives. Metro staff continues to engage Cooperating Agencies, for instance, Caltrans reaffirmed their comments submitted in 2014 for the Draft EIS/EIR which are cited throughout this report. The Environmental Protection Agency submitted a comment letter that is included in **Appendix A.** USACE did not provide any updated comments. It should also be noted that the Cooperating Agency provided extensive comments on the 2014 Draft EIS/EIR that also need to be considered in the reinitiated environmental review process. The 2014 agency comment letters are provided in **Appendix A**. Following is a summary of their concerns related to the SR 60 Alternative:

- EPA identified the potential constructability and safety challenges with the SR 60 Alternative, including the proposed locations on or near the OII Superfund site.

- USACE voiced concerns about the SR 60 Alternative alignment, Santa Anita station, parking structure, and access roads being sited in the Whittier Narrows Dam Basin, including the potential safety risks of locating transit facilities within a flood basin and the risk of potential delays as "riders might also be stranded at the proposed Shops at Montebello and Peck Stations if the Santa Anita Avenue station must be bypassed due to flood events". USACE noted that "the Washington Alternative might be considered a practicable alternative outside a floodplain, as required by Executive Order 11988".

- Caltrans mentioned the extensive review process for the encroachment permit, potential traffic and congestion impacts on freeway on/off ramps and nearby surface streets including near the proposed stations, potential aesthetic impacts, future Caltrans plans to widen the SR 60 and related ROW concerns, additional Caltrans projects including the Paramount Boulevard/SR 60 Interchange, non-standard existing facilities, long term lane closures, and community updates.

In 2019, Caltrans reaffirmed that an encroachment permit would be required if the SR 60 Alternative operates within their ROW.

6 CONSISTENCY WITH METRO POLICIES

6.1 Equity-Focused Communities

6.1.1 Equity Platform Framework

The Metro Equity Platform, adopted by the Metro Board in 2018, is a groundbreaking policy framework for addressing access that resulted from historical disinvestment in low-income communities and communities of color. The Equity Platform Framework includes four key pillars to guide the agency's work in addressing access to opportunity. The Equity Platform four pillars are as follows:

- Define and Measure
- Listen and Learn
- Focus and Deliver
- Train and Grow

6.1.2 Metro's Equity Focus Communities

The Draft 2020 LRTP includes two frameworks that help address the first two Equity Platform pillars (Define and Measure and Listen and Learn). The LRTP Baseline Understanding Framework and the Values Framework sections are described below:

- The Baseline Understanding Framework examines current countywide conditions to prepare for future growth and investments including distribution of population and access to resources and opportunities or lack thereof.
- The Values Framework evaluates the areas most in need of equity throughout the County by examining the correlation between demographic factors and opportunity gaps or "Equity Focus Communities" (EFCs). EFCs are identified to measure and track future equity impacts from a transportation perspective. The EFCs and the related equity-specific performance measures will help indicate specific outcomes and benefits of LRTP investments by highlighting populations in Los Angeles County that face greater barriers to opportunities. The equity impact analysis will serve as a holistic framework for assessing progress in closing gaps to opportunity and other equity impacts.

The EFC definition identifies two demographic factors that have historically been determinants of disinvestment and disenfranchisement: Household income and race/ethnicity. Households with low vehicle ownership also presents an opportunity to target new mobility investments in neighborhoods with a higher propensity to take advantage of them. Together these three factors represent the locations where strategic transportation investments can have the greatest impact on reducing disparities in access to opportunity.

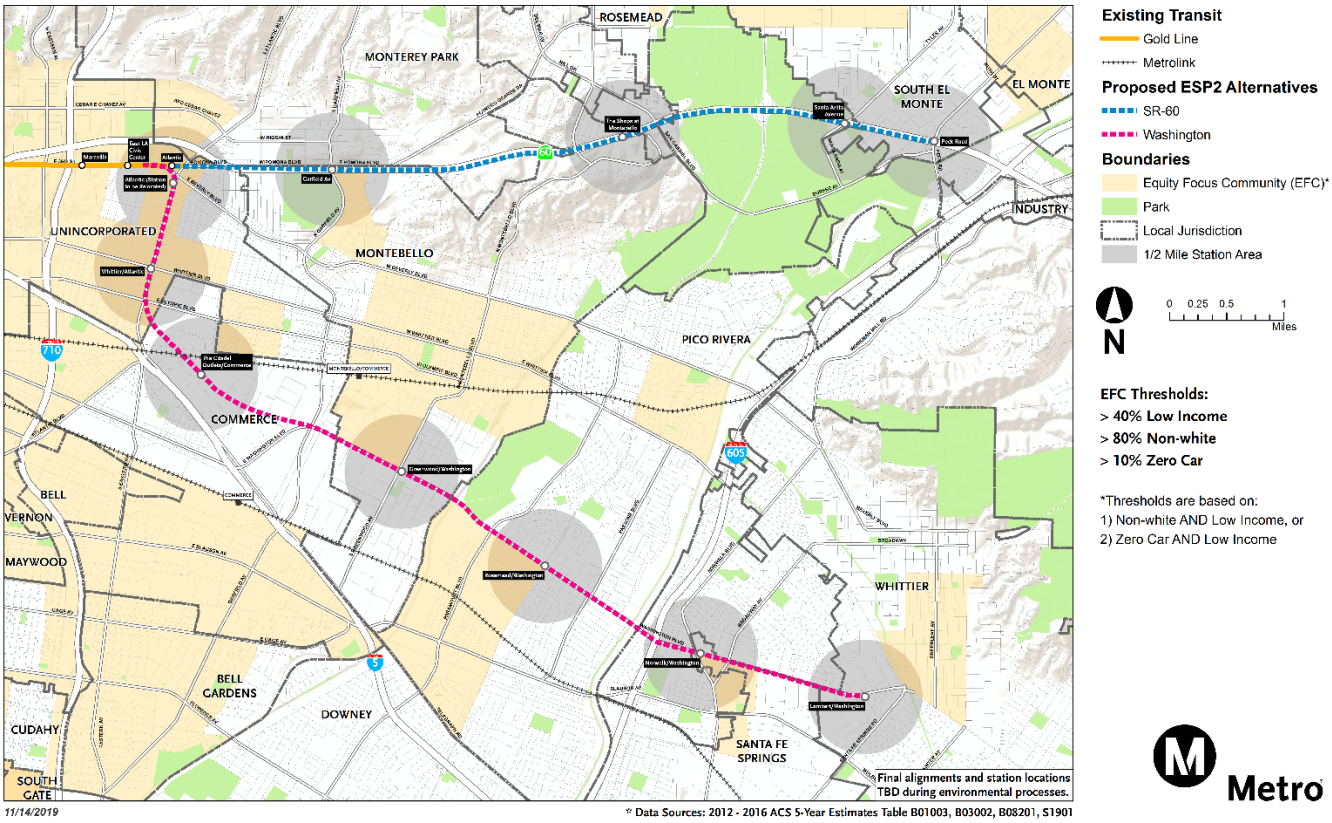
Demographic and statistical information about the following groups was reviewed: Non-white; low-income over 64; households without disability; single-parent households; zero-car households; rent-

burdened households; and households with limited English. The analysis reviewed how demographic groups fared in terms of facing certain risks referred to "opportunity gaps". Examples of opportunity gaps considered are lower numbers of high school graduation, higher rate of homelessness, asthma rates, more arrests per capita.

6.1.3 EFCs along Eastside Transit Corridor Phase 2 Project

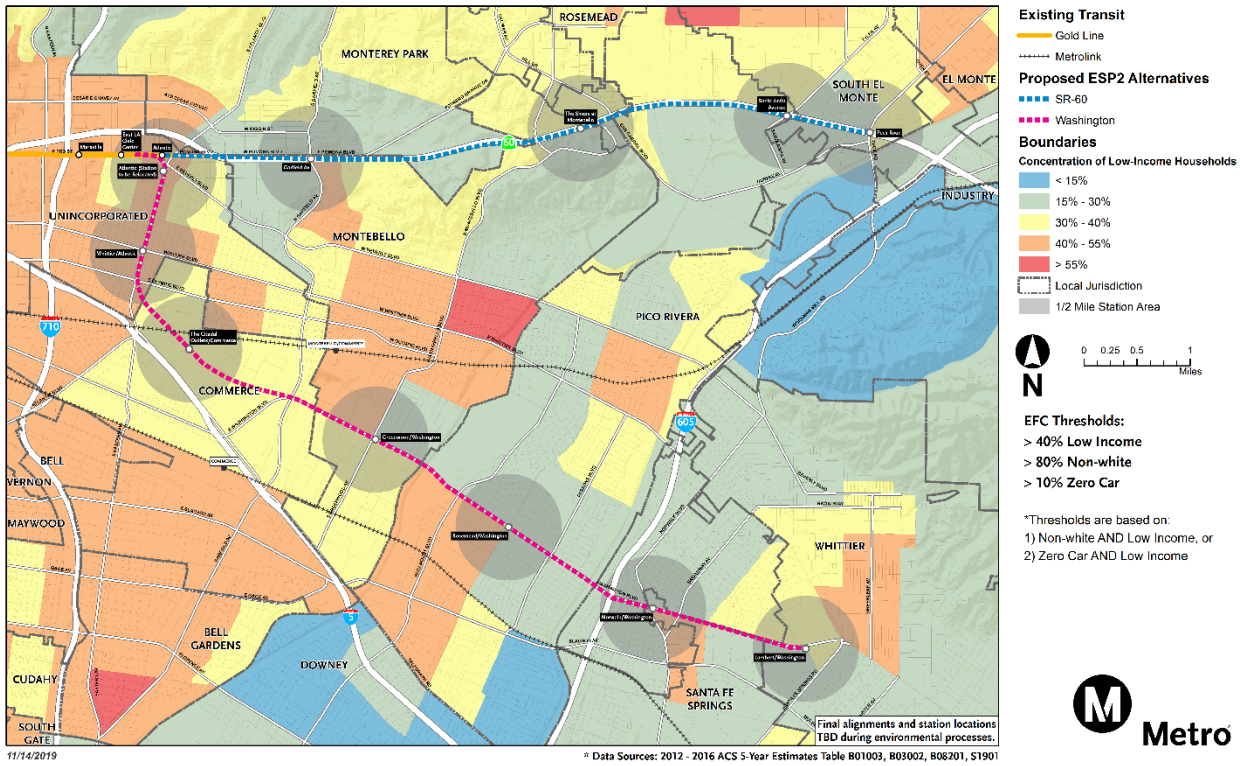
In order to understand the communities, 2017 baseline year demographic data was used to understand communities' social, demographic, and geographic information. The communities along the SR 60 Alternative, when compared to the county average, have lower densities, less communities with non-English speaking population, and less communities living below the federal poverty level. Figure 6-1 through Figure 6-4 illustrate the three demographic data sets along with the full EFC mapping. Based on the compilation of these data, it was determined that the SR 60 Alternative would serve a lower number of EFCs in comparison to the Washington Alternative.

Figure 6-1. Eastside Phase 2 Equity Focused Communities



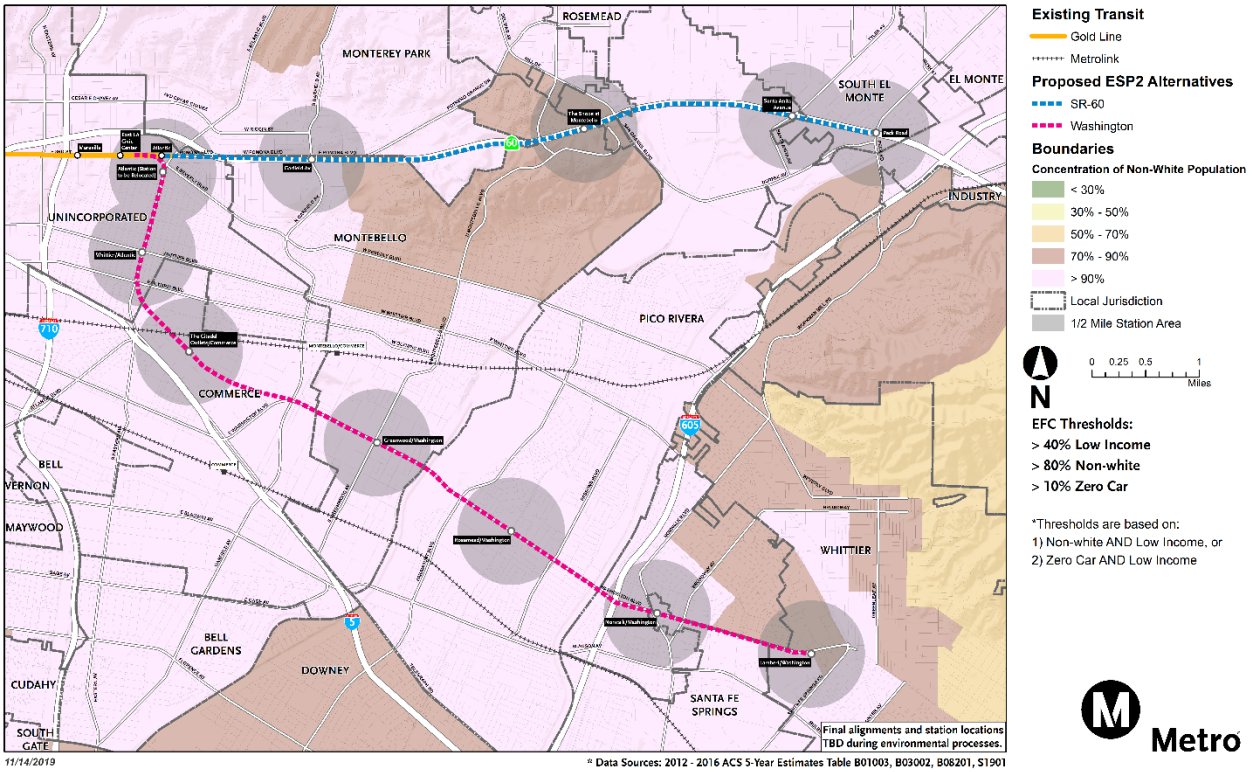
Source: Metro, 2019

Figure 6-2. Eastside Phase 2 Low-Income Households



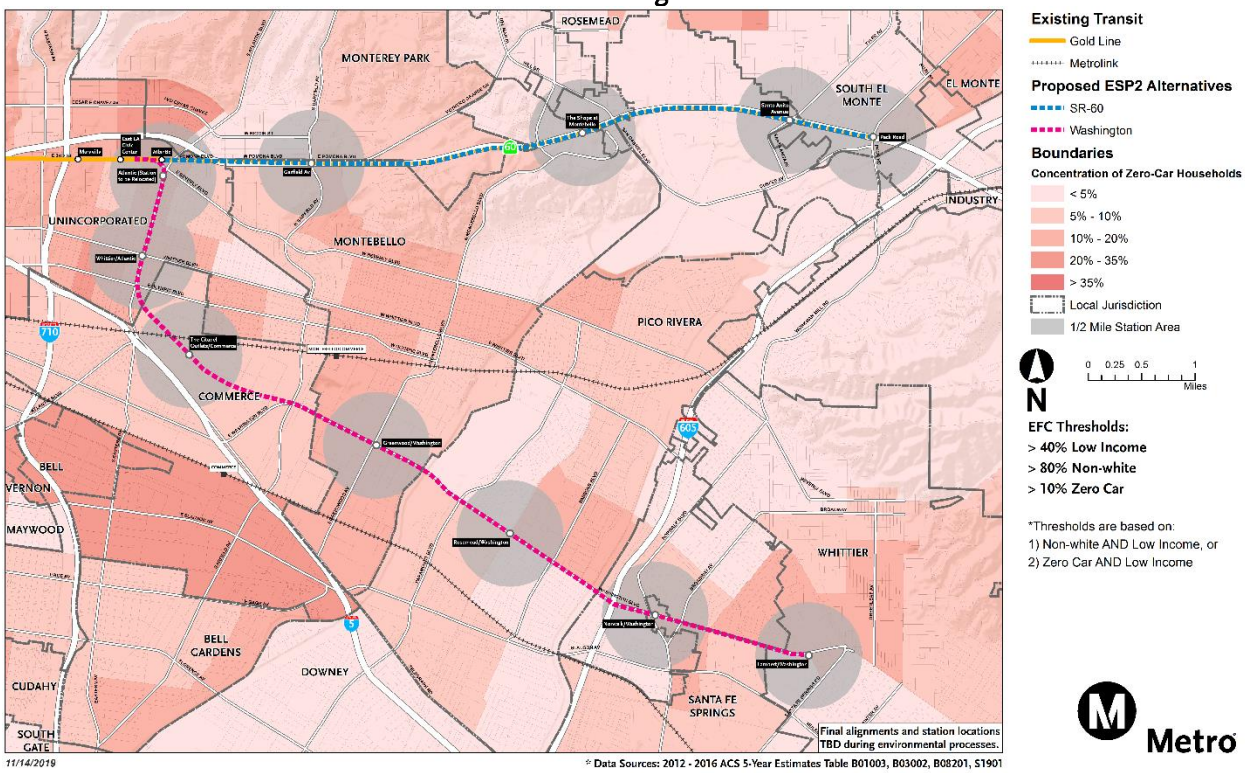
Source: Metro, 2019

Figure 6-3. Eastside Phase 2 Non-White Population



Source: Metro, 2019

Figure 6-4. Eastside Phase 2 Zero-Car Households



Source: Metro, 2019

6.2 Transit-Oriented Communities and First and Last Mile

Following the 2017 Post Draft EIS/EIR Technical Study, the Metro Board adopted new policies to address emerging transportation trends, including TOC and FLM planning. In June 2018, Metro's TOC Policy was adopted to promote places (such as corridors and neighborhoods) that, by design, allow people to drive less and access transit more. TOC's promote more walkable, bikeable, and sustainable neighborhoods adjacent to transit.

The TOC Policy sets the direction to guide Metro decision making for projects and to assist local jurisdictions in maximizing the potential of transit investments in their communities. One important component of TOCs is better access to transit through strong FLM connections, helping connect riders to and from their ultimate destinations.

Metro performed an in-depth analysis of TOC and FLM related factors relevant to assessing the SR 60 and Washington Alternatives. This included an evaluation of key criteria, scoring and ranking of results, which can be found in the Draft *TOC Assessment Report*. The following provides a summary of key findings from the TOC assessment.

6.2.1 Compatibility of TOC, FLM, Environment and Equity

The Draft TOC Assessment Report developed key criteria in the following three main categories TOC, FLM, Environment and Equity. Each category is described below:

- TOC: criteria relate to an evaluation of adjacent land uses, population and employment densities.
- FLM: criteria analyzed bicycle facilities, block sizes and active transportation elements.
- Environment and Equity: assessed physical barriers in the surrounding station area environment and the extent to which transit dependent communities are served.

The SR 60 Alternative demonstrated less potential for TOC, FLM, Environment and Equity than the Washington Alternative. The SR 60 Alternative is challenged and constrained because the guideway runs parallel to the freeway. Stations are therefore located in close proximity to the adjacent freeway, and they lack direct connections to residential communities within the half-mile station area. The Combined Alternative is the sum of the SR 60 and Washington alignments with a wye junction connection to allow for combined operation of both alternatives. Therefore, for purposes of the TOC and FLM analysis, the Combined Alternative was not analyzed separately. The proposed stations along each alternative are evaluated in the following sections.

6.2.1.1 Transit-Oriented Communities

Proposed stations along the SR 60 Alternative demonstrated less opportunities for TOC compatibility. This is due in large part to the nature of station surroundings including auto-oriented land uses and stations situated adjacent to the SR 60 Freeway. The stations along the SR 60 Alternative lacked transit-supportive land-use patterns and demonstrated limited opportunities for adjacent transit-supportive development. The Shops at Montebello station along the SR 60 Alternative is the only station with development patterns consistent with TOC compatibility given its proximity to a regional mall and residential neighborhoods to the north.

- Stations along the SR 60 Alternative have less population density concentrated along stations, including The Shops at Montebello and Santa Anita, which serve the lowest population.

- The majority of stations along the SR 60 Alternative lack connections to employment concentrations, with Shops at Montebello, Santa Anita, and Peck having the lowest employment densities.

Stations along the Washington Alternative serve neighborhoods with higher population densities. Atlantic/Whittier Boulevard, and Lambert stations exhibit the highest concentration of residents within a half-mile of stations. **Additionally, the Washington Alternative stations provide greater access to jobs.** Atlantic/Whittier Boulevard, Citadel, and Lambert stations have the highest level of employment densities, serving a greater number of jobs.

6.2.1.1.1 First/Last Mile

The SR 60 Freeway is not only a physical barrier between the northern and southern portions of the SR 60 Alternative station areas; it also presents pedestrian connectivity and safety challenges. Some stations along the SR 60 Alternative alignment are situated in large commercial shopping centers and recreational zones near freeway on/off-ramps. Connections to existing residential neighborhoods are hindered by the quality of the public realm, a discontinuous and suburban street network, large block sizes, numerous freeway on/off ramps and freeway underpasses. The street network, large block sizes, and freeway proximity also limits the future ability to implement more walkable and bikeable infrastructure.

Pedestrian access to stations along the SR 60 Alternative is hindered by the auto-oriented and freeway adjacent nature of station surroundings. These station areas have larger block sizes, discontinuous street networks (cul de sacs and lack of street grid), higher presence of curb cuts and driveways, and several freeways on/off ramps which act as physical barriers and impede the quality of the pedestrian environment, and FLM access.

The Washington Alternative station areas provide a more connected street network making it easier to walk, bike, and ride transit. Stations are located in areas with more transit-supportive land use patterns and policies. This is largely because the stations along this alignment are located in close proximity to existing residential neighborhoods and commercial corridors. **The Greenwood and Citadel stations are areas where additional improvements are needed given the industrial nature of the walking environment.**

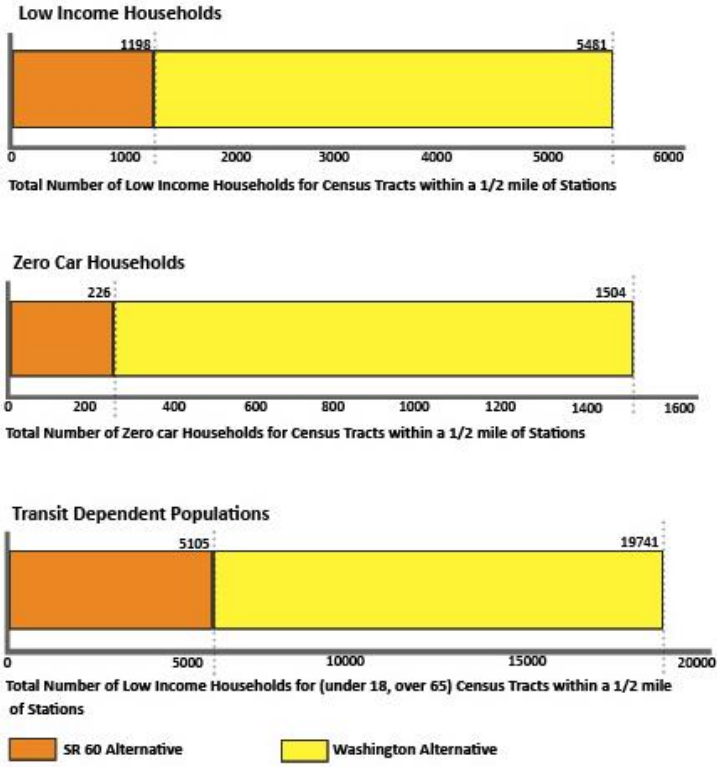
6.2.1.1.2 Environmental and Equity

Given the lack of proximity to residential communities and the lack of direct connections within the half-mile station area the SR 60 Alternative is inconsistent with equity goals, serving fewer low-income and transit dependent populations. Land uses surrounding these stations are also less transit-supportive.

One of the equitable goals of public transit and TOC is to increase access to transit, particularly for transit dependent communities. As discussed in the section above, Metro views equity as a guiding theme and has evaluated equity focused communities based on household income, race/ethnicity, and low vehicle ownership. The TOC and FLM analysis evaluated low-income households, zero-car households and transit dependent population data within a half-mile of the station areas for the SR 60 and Washington Alternatives. Key findings of the analysis indicate that the Washington Alternative serves significantly more low-income and transit dependent populations within a half-mile of stations. The SR 60 Alternative stations serve substantially fewer low-income, transit dependent and zero-car households. Conversely, a majority of the Washington Alternative stations are situated in areas with a higher presence of residential land uses, serving more economically disadvantaged communities who would benefit from improved transit access.

Figure 6-5 provides a comparison of the low-income and transit dependent population data for the SR 60 and Washington Alternatives.

Figure 6-5. Low-Income Households, Zero-Car Households, Transit-Dependent Populations



Source: Metro; Cordoba/HNTB JV, 2019

Additionally, the TOC and FLM analysis indicates that station areas along the SR 60 Alternative are challenged by physical barriers in the surrounding environment. Station locations along the SR 60 Alternative are situated immediately adjacent to the SR 60 Freeway. This infrastructure acts as a physical barrier, further bifurcating northern and southern portions of the corridor and reducing connectivity between residential neighborhoods. Additionally, the potential Santa Anita station site and parking facility is located within a floodplain basin, which limits or eliminates future TOC and FLM potential.

In conclusion, the SR 60 Alternative is less supportive of TOC and FLM policies in contrast to the Washington Alternative. The existing conditions exhibited along the SR 60 Alternative impede TOC and FLM potential. The alignment is generally surrounded by auto-oriented land uses, freeway on/off ramps, utility corridors, less population and employment densities. The Washington Alternative demonstrated greater potential for TOC and FLM. The alignment passes through existing urban communities and would serve transit dependent populations. The connected street network around the Washington Alternative could make it easier to walk, bike, and ride transit. Proposed stations would also be located in areas with more transit-supportive land use patterns and policies.

6.3 Parking Program

Metro is developing a Supportive Transit Parking Program Master Plan (STPP) to manage parking proximate to transit stations. The Master Plan is intended to provide an implementation roadmap for parking management policies, planning, enforcement, and maintenance, as well as the technologies needed to support the recommended plan. The Metro parking system consists of approximately 24,000 total parking spaces within 70 lots, 16 garages and one on-street parking area together serving

59 Metro stations. Specific policy recommendations include managing demand through permit programs and daily fees for high parking stations, enhancing FLM elements to encourage active transportation as means of access to stations, and selling parking to non-transit users.

Strategies to implement parking management programs at stations along the Eastside Transit Corridor Phase 2 Project have been considered, including limiting parking structures at stations to reduce infrastructure requirements, costs and long-term maintenance. Property acquisitions will be required however, there is sufficient space available at most station areas to accommodate the projected parking demand with surface parking lots. The SR 60 Alternative is constrained by adjacent infrastructure and land uses at the end-of-the-line, which complicates the ability to accommodate adequate parking at the Peck Road station. Parking demand is being closely analyzed at Peck Road since it's an end of line station. End of line stations typically create high demand of parking subsequently resulting in a parking structure or extensive property acquisitions to accommodate surface parking. A major parking deficient would be created if no parking garage is built at the end-of-the-line Peck Road station. While some prospective riders would potentially drive to another station on the line, insufficient parking could result in spillover parking in adjacent neighborhoods and a loss of ridership on the project. Metro's Parking Management is being proactive and working with cities to manage potential spillover parking.

7 RECOMMENDATIONS

The Washington Alternative is a viable option with less constraints in contrast to the SR 60 Alternative. Cooperating Agencies had less concerns regarding the Washington Alternative. More importantly, it avoids conflicts with Caltrans ROW, federally protected resources, and avoids major utility conflicts that are more prominent along the SR 60 Alternative.

Based on the results of the engineering studies, environmental analysis, focused technical analyses, new Metro community oriented policies, key stakeholder input, and schedule implications it is recommended that the Metro Board withdraw the SR 60 Alternative and the Combined Alternative from further consideration in the Supplemental/Recirculated Eastside Transit Corridor Phase 2 Project environmental study that is currently underway.

Metro recognizes the mobility needs along the SR 60 Freeway corridor and within the San Gabriel Valley and recognizes the need to continue to work with key stakeholders and the communities in this area to identify alternative transit solutions.

Appendix A – Cooperating Agency Comment Letters on 2014 Draft EIS/EIR and Environmental Protection Agency 2019 Comment Letter

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.

EPA DETAILED COMMENTS ON THE DEIS FOR EASTSIDE TRANSIT CORRIDOR PHASE 2, LOS ANGELES COUNTY, CALIFORNIA, OCTOBER 21, 2014

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.

2

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 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

- 3 -

STATE OF CALIFORNIA—CALIFORNIA STATE TRANSPORTATION AGENCY EDMUND G. BROWN Jr., Governor

DEPARTMENT OF TRANSPORTATION
District 7 – Project Management
100 South Main Street
Los Angeles, CA, 90012
PHONE (213) 897-8316
FAX (213) 897-0648
www.dot.ca.gov

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.

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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

"Provide a safe, sustainable, integrated and efficient transportation system to enhance California's economy and livability"

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

March 18, 2019

Ray Tellis
Federal Transit Administration, Region 9
90 Seventh Street, Suite 15-300
San Francisco CA 94103

Subject: Scoping Comments for the Supplemental Draft Environmental Impact Statement for the Proposed Eastside Transit Phase 2 Project, Los Angeles County, California

Dear Mr. Tellis:

The U.S. Environmental Protection Agency (EPA) has reviewed the Notice of Intent by the Federal Transit Administration (FTA) in the Federal Register on February 11, 2019, requesting scoping comments to prepare a Supplemental Draft Environmental Impact Statement (SDEIS) for the proposed Transit Improvements in the Eastside Transit Corridor Phase 2, in the eastern portion of Los Angeles County, California. We understand that the Los Angeles County Metropolitan Transportation Authority (Metro) will also be preparing an Environmental Impact Report document jointly with the this SDEIS to comply with the California Environmental Quality Act. EPA provides these comments pursuant to the National Environmental Policy Act, Council on Environmental Quality regulations (40 CFR Parts 1500-1508) and Section 309 of the Clean Air Act.

EPA acknowledges the modifications to the proposed project that FTA and Metro have developed to address concerns identified through the development of the Draft EIS published in 2014, particularly the development and eventual adoption of a State Route 60 North Side Design Variation to avoid impacts to the Operating Industries, Inc. Superfund site. Our attached scoping comments provide recommendations for Alternatives Analysis, Aquatic Resources, and Contaminated Land.

We appreciate the opportunity to offer scoping comments. Because the proposed project is adjacent to the OII Superfund site, as well the Omega Chemical Superfund site, EPA requests that FTA and Metro please continue to coordinate with our agency as the Alternatives being analyzed are refined. When the SDEIS is ready, please send one hardcopy to the address above (specify Mail Code ENF 4-2) at the same time that you upload the electronic file through eNEPA. If you have any questions, please contact me, the lead reviewer for this project, at 415-972-3321 or appleton.zac@epa.gov.

Sincerely,

Zac Appleton
Environmental Review Section

cc: Ted Matley, Federal Transit Administration
Mary Nguyen, Federal Transit Administration

Laura Cornejo, Los Angeles County Metropolitan Transportation Authority
Veronica Li, US Army Corps of Engineers, Los Angeles District
Lisa Sandoval, US Army Corps of Engineers, Los Angeles District

EPA SCOPING COMMENTS ON EASTSIDE TRANSIT PHASE 2 SUPPLEMENTAL PROJECT, LOS ANGELES COUNTY, CALIFORNIA, MARCH 16, 2019

Alternatives Analysis

We recommend that Federal Transit Administration (FTA) and Los Angeles County Metropolitan Transportation Authority (Metro) summarize the history of interagency coordination, as well as the Metro Board decisions, that led to the refined set of alternatives proposed for consideration for environmental review in the Supplemental Draft Environmental Impact Statement (SDEIS). Please discuss if the elimination of the Garfield Avenue Build Alternative will result in specific design requirements to the remaining Build Alternatives. For example, identify if a higher minimum number of stations, or larger number of vehicle parking spaces at stations, will be required as elements of the remaining Build Alternatives.

Aquatic Resources

The State Route 60 (SR-60) Build Alternative proposes to extend the light rail line east of the Atlantic Station, along SR-60, north of the Operating Industries, Inc. (OII) Superfund site, through the Whittier Narrows area, terminating at or near Peck Road/Durfee Avenue. EPA recommends that FTA and Metro coordinate closely with United States Army Corps of Engineers, Los Angeles District for any planned alignment through the Whittier Narrows Area, so that potential conflicts between multiple projects in that area can be avoided.

Contaminated Land

The Notice of Intent (NOI) indicates that the SDEIS will consider an Atlantic Boulevard below-grade option. In that option, the existing Atlantic Boulevard Station would become below-grade, and the Gold Line light rail line would proceed below-grade roughly along Atlantic Boulevard to Washington Boulevard. Since that design option can be reasonably anticipated to disturb subsurface soils, and there are a number of small-scale Resource Conservation and Recovery Act (RCRA) regulated hazardous waste generators on the alignment, we recommend FTA consider a soil sampling, analysis, and response plan for contaminated soils, as well as an occupational safety plan for this design option.

The NOI also indicates that the proposed Washington Boulevard alignment would continue at-grade on Washington Boulevard to just west of Lambert Road, with a design option of an aerial span along Washington Boulevard. We note that the project's soil vapor investigation report from 2016 detected low concentrations of perchloroethylene (PCE) in subsurface soil gas at a potential station area on Washington Boulevard and Lambert Road. The contaminants may originate at the Omega Chemical Superfund site. The measured concentrations of PCE were below EPA cleanup levels for the Omega site, but some samples exceeded EPA or State screening levels for PCE in a commercial/industrial exposure scenario. We recommend FTA continue to use the best available soil vapor investigation information in this alignment's design and construction safety protocols.

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Appendix B –
Justice and Equality for the Eastside Coalition

Wednesday, June 19, 2019

The Justice and Equality for the Eastside Coalition positions presented Wednesday, June 19, 2019 at the 4th Street Primary Center.

My name is John Corcoran and I am an organizer of the Justice and Equality for the Eastside Coalition.

1. The Justice and Equality for the Eastside Coalition opposes the SR-60 Northside Design Variation alternative, commonly called the 60 Freeway Gold Line Extension, as currently proposed, with an at grade/aerial build. A no build option will be advocated for by the Justice and Equality for the Eastside Coalition, if Metro continues to support this alternative for an at grade / aerial design.

2. The Justice and Equality for the Eastside Coalition will only support the 60 Freeway Gold Line Extension Alternative if an underground construction design is utilized on Pomona Blvd. for the first 4,500 ft. from west of Atlantic Blvd. to east of Findlay Ave, at the beginning of the Montebello Golf Course.

3. The Justice and Equality for the Eastside Coalition supports the Atlantic Blvd./Washington Blvd. alternate, but only if the Atlantic Blvd. portion is built fully underground.

4. Metro and our past elected officials have had a sordid history of shortchanging the East Los Angeles Community, beginning in 1998, with shifting of funds allocated for a heavy subway on Whittier Blvd., thus ending the Red Line Eastside Extension.
Metro continues to fund first class designs for underground construction of the Purple line in Westside neighborhoods, such

as Beverly Hills, Century City and Westwood, yet proposes inferior construction builds for minority Eastside Los Angeles communities by designing and advocating for at grade and aerial construction. This is clearly an issue of environmental justice by the shortcomings caused by inferior construction builds being pushed on Eastside Communities by Metro, with resulting detrimental quality of life and health issue impacts associated with these inferior construction methods. One only needs to look at how the at grade Gold line on 3rd Street was constructed in the unincorporated area of Los Angeles County, specifically East Los Angeles, as compared to the premium underground construction the City of Los Angeles received beginning on 1st Street west of Indiana St. It defies common sense and illustrates the apathy directed at the East Los Angeles Community for Metro to build a line as to what is constructed on 3rd Street, blocking the East Los Angeles Sheriff's substation access to eastbound 3rd Street for emergency dispatches. Perhaps it doesn't matter to Metro, but it surely matters to any East Los Angeles resident east of Atlantic Blvd. when a life or death situation could hinge on seconds for a Los Angeles County Sheriff's patrol unit to arrive. However, that patrol unit must proceed west on 3rd St. from their substation, then make a u-turn at La Verne Ave, and then double back eastbound on 3rd. Street. Seconds to minutes could be lost by this unwarranted delay.

This is just another example of the shortcomings of Metro's Eastside designs which have placed our community at risk. It just proves Metro does not care about our community's needs.

4. The Via Campo neighborhood is merely a pass through destination for what will ultimately benefit Monterey Park, Montebello, Rosemead, South El Monte and prospectively cities further east on future builds.

If this project is important enough to these cities, who will be the beneficiaries of the 60 Freeway Gold Line Extension, let them

open their checkbooks to underwrite and eliminate any detrimental impacts imparted onto East Los Angeles and western Montebello by contributing money to an underground build for the first 4,500 ft. of the 60 Freeway Gold Line Extension.

5. The Justice and Equality for the Eastside Coalition has over 400 signatures from residents of the Via Campo neighborhood opposed to the current proposed construction of an at grade and aerial Metro line for the 60 Freeway Gold Line Extension. This neighborhood will vehemently oppose Metro's inferior design of an at grade and aerial design which will impact our lives, our children's lives, and future generations living along this Metro Rail corridor.

Only by a no build option or an underground construction option, can our neighborhood be saved from the negative health and quality of life impacts currently being proposed by Metro.

Submissions:

1. Petitions with over 400 signatures to save our neighborhood
2. Phillip Washington letter dated July 13, 2017
3. Hilda Solis letter dated December 21, 2017
4. Operating Engineers letter dated March 20, 2018
5. Supplemental sheet titled Additional Impacts to the Via Campo neighborhood by the construction of an at grade/aerial design for the first 4,500 ft on Pomona Blvd.