

3096 2074

**Myra L.  
Frank &  
Associates, Inc.**

811 West 7th Street, Suite 800, Los Angeles, California 90017

(213) 627-5376 FAX (213) 627-6853

ENVIRONMENTAL REPORTS  
ARCHITECTURAL HISTORY  
TRANSPORTATION  
HOUSING

November 17, 1992

To ACTA Board members and supporting staff,

At yesterday's meeting of the ACTA Technical Working Group, a request was made for copies of comments to be provided to Board members for review, in advance of issuing the FEIR. Pursuant to that request, the ACTA General Manager has directed me to distribute the enclosed copies of letters of comment made by members of the ACTA Board on the DEIR.

Sincerely,

  
Gary L. Petersen

copy: Gill Hicks

0650 05 02 03 01 4232  
ACTA BOARD MEMBERS  
MYRA L. FRANK & ASSOCS. INC.  
RESPONSES TO A DEIR FOR THE PROPOSED ALAMEDA  
CORRIDOR  
11/17/92

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# COUNTY OF LOS ANGELES

## DEPARTMENT OF PUBLIC WORKS

900 SOUTH FREMONT AVENUE  
ALHAMBRA, CALIFORNIA 91803-1331  
Telephone: (818) 458-5100

THOMAS A. TIDEMANSON, Director

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

October 7, 1992

IN REPLY PLEASE  
REFER TO FILE P-4

Mr. Gill V. Hicks, General Manager  
Alameda Corridor Transportation Authority  
6550 Miles Avenue, Room 113  
Huntington Park, CA 90255

Dear Mr. Hicks:

### RESPONSE TO A DRAFT ENVIRONMENTAL IMPACT REPORT ALAMEDA CORRIDOR ROADWAY IMPROVEMENTS

Thank you for the opportunity to provide comments on the Draft Environmental Impact Report (DEIR) for the proposed Alameda Corridor. Although we have not completed our review of the DEIR, we offer the following comments. We will forward additional comments when we complete our review.

#### Transportation Planning

Alameda Street, within County unincorporated areas, between Florence Avenue and Del Amo Boulevard is classified as a secondary highway on the Highway Plan which is designed to accommodate four traffic lanes. The Alameda Corridor project proposes to widen Alameda Street from four lanes to six lanes within these limits, and would change this classification from a secondary highway to a major highway. A Highway Plan Amendment is required to change the classification of a County highway.

If you have any questions regarding these comments, please contact Mr. Hans Riedel of our Planning Division at (818) 458-4364.

#### Traffic/Circulation

The DEIR examines two alternative trainway sections: An At-Grade Section and a Depressed (below grade) Section. The At-Grade Section (Alternative 1.0) consists of an at-grade two-track railroad main line with drill track, together with six traffic lanes throughout the Alameda Project limits. At 22 selected locations where streets cross the railroad tracks, east/west grade separations would be provided to permit effective railroad operations and improve traffic flow. Access roads adjacent to the grade separation structures would be provided through local street improvements. For the Depressed Section, two trainway trench designs (Alternatives 2.1 and 2.2) are presented. The depressed trainway consists of two main line rail tracks, together with an at-grade drill track and a six-lane roadway facility throughout the project limits. The Alameda Corridor Transportation Authority identifies the depressed trainway as the preferred configuration.

We agree with the study that development of the Alameda Corridor into a high-capacity truck/train corridor would serve the long-term port access needs of the Los Angeles and Long Beach harbors and provide truck traffic relief to the Long Beach and Harbor Freeways.

The report states that design goal criteria for the Alameda Corridor alternatives would be to implement additional roadway improvements at intersections such that the volume-to-capacity (v/c) ratios for the Year 2020 are reduced to below 0.90 or within 0.02 of the No Build Condition v/c ratio.

2

The report indicates that in the Year 2020, the intersection v/c ratios for the two alternatives with proposed roadway mitigation in place will be significantly greater than the design goal criteria. The report states that no additional roadway improvements are possible due to right of way constraints.

We recommend that the study be expanded to include intersection v/c ratios for the two alternative trainway sections mitigated to at least the level of the No Build Condition v/c ratio for the Year 2020. For those intersections that will require acquisition of additional right of way to meet design goal criteria, geometric plans showing existing and required right of way should be included in the study, as well as a discussion on the feasibility of acquiring additional right of way and estimated costs.

3

While the Alameda Corridor will facilitate truck/train access between the ports and downtown Los Angeles, the project should ensure that traffic circulation along east/west arterials is not adversely impacted with implementation of the project.

In addition, the following typographical errors are noted:

4

- Table 5-34 - v/c comparison is for the Year 2020 and not 2010 as labeled on page 5-186.
- Under the heading "Affected Streets and Intersections" page 5-179, intersections exceeding threshold criteria under the different project alternatives in the Year 2020 should be identified as Table 5-31 and not Table 5-21 as stated in the report.

If you have any questions regarding these comments, please contact Mr. Joaquin Herrera of our Traffic Investigations and Studies Section at (818) 458-5909.

Mr. Gill V. Hicks  
October 7, 1992  
Page 3

Questions regarding the environmental reviewing process of this Department can be directed to Ms. Clarice Nash at the above mailing address or at (818) 458-4334.

Very truly yours,

T. A. TIDEMANSON  
Director of Public Works



*for*  
CARL L. BLUM  
Assistant Deputy Director  
Planning Division

MA:aa  
P-4/168

bc: Traffic and Lighting (Herrera)  
Planning (2) (Riedel and Nagao)



# COUNTY OF LOS ANGELES

## FIRE DEPARTMENT

1320 NORTH EASTERN AVENUE  
LOS ANGELES, CALIFORNIA 90063-3294

(213) 881-2481

P. MICHAEL FREEMAN  
FIRE CHIEF  
FORESTER & FIRE WARDEN

September 22, 1992

Gill V. Hicks, General Manager  
Alameda Corridor Transportation Authority  
6550 Miles Avenue, Room 113  
Huntington Park, CA 90255

Dear Mr. Hicks:

**SUBJECT: ENVIRONMENTAL IMPACT REPORT -- SOUTHERN L.A. COUNTY  
DEIR ALAMEDA CORRIDOR, SCH#90011169 (LAC #910108)**

Our evaluation of the impact on fire protection, paramedic service, and hazardous materials response for the proposed development is based on the current level of service available within the general area. With this in mind, additional manpower and equipment will be required as the development proceeds.

This development will directly affect the services that are provided by the Los Angeles County Fire Department (Fire Department) Fire Station #9, #164, #16, #41, #105, and #127, which primarily have jurisdictions/responsibilities in portions of the Alameda Corridor (Corridor). However, additional resources respond from other Los Angeles County fire stations in the event the primary station is on another incident. The Alameda Corridor as planned will compromise the response capability of Fire Station #105. Fire Station #105 should be replaced at a location acceptable to the Fire Department as part of the Corridor's financial responsibility.

The Corridor will travel through or near areas of the County and cities served by the Fire Department that have been traditionally high-service areas.

### SERVING THE UNINCORPORATED AREAS OF LOS ANGELES COUNTY AND THE CITIES OF:

AGOURA HILLS  
ARTESIA  
AZUSA  
BALDWIN PARK  
BELL  
BELLFLOWER  
BELL GARDENS

BRADBURY  
CALABASAS  
CARSON  
CERRITOS  
CLAREMONT  
COMMERCE  
CUDAHY

DIAMOND BAR  
DUARTE  
GLEN DORA  
HAWAIIAN GARDENS  
HIDDEN HILLS  
HUNTINGTON PARK  
INDUSTRY

IRWINDALE  
LA CANADA FLINTRIDGE  
LAKEWOOD  
LA MIRADA  
LANCASTER  
LA PUENTE  
LAWDALE

LOMITA  
MALIBU  
MAYWOOD  
NORWALK  
PALMDALE  
PALOS VERDES ESTATES  
PARAMOUNT

PICO RIVERA  
RANCHO PALOS VERDES  
ROLLING HILLS  
ROLLING HILLS ESTATES  
ROSEMEAD  
SAN DIMAS  
SANTA CLARITA

SIGNAL HILL  
SOUTH EL MONTE  
SOUTH GATE  
TEMPLE CITY  
WALNUT  
WEST HOLLYWOOD  
WESTLAKE VILLAGE  
WHITTIER

Gill V. Hicks, General Manager  
September 22, 1992  
Page 2

2 | In order to assure that fire and rescue services are maintained to the areas affected by the Corridor, it is essential that the Fire Department review and approve plans for each phase of the project to ensure the public safety.

As stated in the draft Environmental Impact Report, the purpose of this project is to facilitate ports access through the development of the transportation corridor that addresses issues associated with the movement of both highway and train traffic.

3 | A high volume of fire and paramedic responses are a result of traffic accidents and there is no doubt that this Corridor will increase traffic. Additionally, rail traffic has the potential for a major incident that could involve a great deal of manpower and specialized units such as hazardous material response.

Additional manpower, equipment, and facilities will be needed to serve this development. Mitigation of this problem should be required prior to granting approval of this project.

**FORESTRY DIVISION**

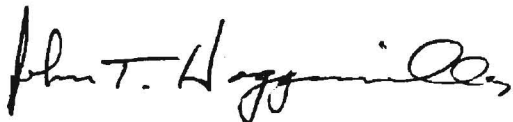
We have reviewed the DEIR for the Alameda Corridor located in the unincorporated area of Los Angeles County.

The proposed project will not have significant environmental impacts in the area germane to the Forestry Division of the Los Angeles County Fire Department.

If you have any additional questions, please contact this office at (213) 881-2481.

Very truly yours,

P. MICHAEL FREEMAN



BY

JOHN T. HAGGENMILLER, ACTING CHIEF, FORESTRY DIVISION  
PREVENTION BUREAU

JTH:rd



# COUNTY SANITATION DISTRICTS OF LOS ANGELES COUNTY

1955 Workman Mill Road, Whittier, CA 90601-4998  
Mailing Address: P.O. Box 4998, Whittier, CA 90607-4998  
Telephone: (310) 699-7411, FAX: (310) 695-6139

CHARLES W. CARRY  
Chief Engineer and General Manager

September 23, 1992

File No: 1-00.04-00  
8-00.04-00  
23-00.04-00

Mr. Gill V. Hicks, General Manager  
Alameda Corridor Transportation Authority  
6550 Miles Avenue, Room 113  
Huntington Park, CA 90255

Dear Mr. Hicks:

## Alameda Corridor

The County Sanitation Districts received a *Environmental Impact Report* for the subject project on August 24, 1992. Portions of the proposed project are located within the jurisdictional boundaries of Sanitation Districts Nos. 1, 8, and 23. We offer the following comments on the proposed project.

- 1 • The proposed project will impact several existing and/or proposed Districts' trunk sewers over which it will be constructed. Existing and proposed Districts' trunks sewers are located directly under and/or cross directly beneath the proposed project alignment. The Districts cannot issue a detailed response to or permit construction of the proposed project until project plans and specifications which incorporate Districts' sewer lines are submitted. In order to prepare these plans, you will need to submit a map of the proposed project alignment, when available, to the attention of Calvin Jin of the Districts' Sewer Design Section at the address shown above. The Districts will then provide you with the plans for all Districts' facilities which will be impacted by the proposed project. Then, when revised plans which incorporate our sewers have been prepared, please submit copies of the same for our review and comment.
- 2 • The Sanitation Districts are empowered by the California Health and Safety Code to charge a fee for the privilege of connecting to the Sanitation Districts' Sewerage System or increasing the existing strength and/or quantity of wastewater attributable to a particular parcel or operation already connected. A connection fee is required in order that necessary expansions to the Sewerage System can be constructed to accommodate new development. Payment of a connection fee will be required before a permit to connect to the sewer is issued.

If you have any questions, please contact the undersigned at (310) 699-7411, extension 2717.

Very truly yours,

Charles W. Carry

David B. Lambert  
Project Engineer  
Financial Planning &  
Property Management Section

DBL:rc

NA:ENVASSE:ENVASSZALAMCORR.2LT



# CITY OF CARSON

October 5, 1992

Mr. Gill Hicks, General Manager  
Alameda Corridor Transportation Authority  
6550 Miles Avenue, Room 113  
Huntington Park, CA 90255

Dear Mr. Hicks:

The City of Carson thanks you for the opportunity to respond to the Alameda Corridor Draft Environmental Impact Report. The City is very interested in this project which would improve the facilities to move Port related freight through the area. The City of Carson has the following comments on the subject EIR:

## Reason for Project

1 The Draft EIR does not clearly state the reason that the Alameda Corridor Project is needed. The need is created by the expansion of the Ports of Los Angeles and Long Beach, therefore, the Ports must assume responsibility for mitigating the adverse impacts.

## Funding for the construction of grade separations in Carson

The City of Carson is designated to have the following three grade separations constructed:

Alameda and Del Amo Boulevard  
Alameda and Carson Street  
Alameda and Sepulveda Boulevard

2 Although partial funding has been committed to each of these projects, there is a significant funding shortfall which could delay the construction of these projects. The new Federal Transportation Act has \$9.5 million committed towards the Sepulveda/Alameda Overpass. The construction cost is projected to be \$25 million. The funding for the remainder of the cost of construction has not yet been identified.

The EIR assumes that the Del Amo Boulevard and Carson Street overpasses will be implemented by others as Ports Access Demonstration Projects (Section 2.2.2). Since the Del Amo Boulevard overpass is within the County of Los Angeles, the design standards required by the County must be used which has raised the cost of construction. The funding for the additional cost has not been identified.



2 | If these projects are not constructed within the timelines projected by the Alameda Corridor Project, then unmitigated impacts could occur. Therefore funding priorities should be provided to assure the construction of the approved overpasses first.

3 | The issue of providing sufficient clearances for future electrification needs to be resolved. The State and Federal agencies have refused to fund the additional electrification costs, therefore the City will design for only the normal clearance unless ACTA commits to fund the difference. The Del Amo Street overpass is currently under design. If design modifications are requested and funded, immediate notification must be submitted to Carson.

Soundwalls

4 | The proposed improvements through the City of Carson will be at grade in all alternatives. It will be difficult if not impossible to mitigate the noise impacts for the residences east of Alameda Street within the City of Carson. A study has been completed by Davy & Associates, Inc. which indicates that a soundwall 18' high would be needed to mitigate the impacts of the noise from the trains. There is minimal right of way to build the sound wall adjacent to the train tracks. If the soundwall is built in this location the noise impacts from the trucks along the improved Alameda Corridor would not be mitigated. The 18' high wall would also be a graffiti problem and divide the community. If the wall is built on the east side of Alameda Street, the businesses along this side of the street are impacted since they have no setback and the wall would be at their front door. If the wall is built on the east side of businesses, access to the businesses from the alley is impeded and a barrier is built along the residences. The methods of implementation of noise mitigation measures in this area will have to be carefully considered to determine the best location of the soundwall and the residual impacts on the residents and businesses.

If you have any questions regarding these comments, please feel free to call George Schultz or Chris Ketz at (310) 830-7600 extension 330.

Sincerely,

  
Patrick Brown  
Community Development Director

cc: Mayor Michael Mitoma  
Larry Olson, City Administrator



**OFFICE OF THE CITY MANAGER**

205 South Willowbrook Avenue  
Compton, California 90220  
(213) 605-5585  
FAX (213) 631-0322

**WALTER R. TUCKER, III**  
MAYOR, EXT. 5590

**COUNCILPERSONS**

**PATRICIA A. MOORE** EXT. 5205  
**BERNICE WOODS** EXT. 5206  
**JANE D. ROBBINS** EXT. 5207  
**HOWARD CALDWELL** EXT. 5585  
City Manager

**CITY OF COMPTON**

October 12, 1992

Mr. Gil Hicks  
Alameda Corridor Transportation Authority  
6550 Miles Avenue, Room 113  
Huntington Park, California 90255

RE: ALAMEDA CORRIDOR PROJECT -  
RESPONSE TO DRAFT ENVIRONMENTAL IMPACT REPORT

Dear Mr. Hicks:

This letter constitutes the City of Compton's response to the Alameda Corridor Draft Environmental Impact Report (DEIR) dated August 1992 prepared by the Alameda Corridor Transportation Authority (ACTA).

The City recognizes the regional significance and transportation-related advantages that the Alameda Corridor Project would provide and acknowledges the efforts undertaken by ACTA in its development.

However, while the City is not opposed to the project in concept, a thorough review of the DEIR for scope, content, and adequacy in addressing the issues and concerns that the City believes are imperative for a proper assessment of the impact of the project on both its inhabitants and physical environment leads it to two ineluctable determinations.

First, at this time the City wishes to state its strong objection to the DEIR as a whole because of the absence within the document of consideration of a number of issues of major relevance to the well-being of the citizens of Compton. These issues -- which need to be addressed in detail for the City to provide a more reasoned response -- are outlined below.

Second, given such categorical opposition, the City wishes to further state its concerns about the two proposed alternatives contained in the DEIR at this time. The issues not considered to date must be addressed no matter which alternative is under discussion. Given this fact, the City is unalterably opposed to Alternative 1.0 (at-grade trainway), and has major -- though not insurmountable -- concerns about Alternative 2.1A (depressed trainway) provided that all relevant concerns are addressed and proper mitigation measures are implemented. 2

The following issues need to be considered and dealt with at length in the DEIR for the City to arrive at a final, reasoned view of the project:

1. The project will result in a major disruption across the entire core of the City and will have a major impact on development within the City's Central Business District (CBD). There would be a significant disruption to commercial activity and a considerable loss of business revenues, with a resultant significant impact on the City's economic base. The DEIR should therefore include a detailed fiscal impact study focusing on the economic impact that Compton would experience as a result of the proposed project. The DEIR should also include a fiscal impact analysis of the projected growth and expansion of the ports resulting from the proposed project. The report should be available to all jurisdictions along the corridor. 3
2. The DEIR should consider the possibility of additional streets crossing over the corridor. Presently there are twelve streets within the City that cross the Southern Pacific Transportation Company San Pedro Branch (Alameda Street) right-of-way. Only five will continue to cross after completion of the proposed project. This will result in further isolation of neighborhoods and restriction in vehicle and pedestrian access, and cause separation of residential development from surrounding commercial services, especially in the northern portion of the City. 4
3. The reduction in the number of streets that cross the San Pedro Branch right-of-way will also have an impact on emergency response time, especially Fire Department response time. There is only one fire station in the eastern portion of the City, located on Palmer Street and Crane Avenue. The closure of streets will significantly reduce routes that are used and will affect response time. 5

The DEIR indicates that the existing crossing at Palmer Street will be closed; this impact should be considered. | 5

4. The DEIR should consider in greater detail the impact of the proposed project (and project alternatives) on the completion of the "MC-5" (Mealy Street Diversion) Project for diversion of freight traffic off of the Southern Pacific Transportation Company Wilmington Branch (Willowbrook Avenue) right-of-way south of Mealy Street. | 6
5. A cost-benefit analysis of the proposed project's impact to help arrive at viable mitigation measures to offset financial impact on the City should be included as part of the DEIR. | 7

The following are the major concerns which cause the City of Compton to be strongly opposed to Alternative 1.0 (at-grade trainway) and in support of Alternative 2.1A.

1. Alternative 1.0 includes construction of overpasses on at least four of the City's major thoroughfares: El Segundo Boulevard, Compton Boulevard, Alondra Boulevard, and Greenleaf Avenue. (Rosecrans Avenue already has grade separation.) The construction of overpasses at the thoroughfares discussed above will result in the loss of a significant amount of commercial parcels and major disruption to two new major shopping centers (Compton Towne Center and Northside Shopping Center) located in the City's CBD adjacent to the proposed Alameda Corridor Project. This alternative would have a major impact on the City's Redevelopment Plan since these two shopping centers would have their entrances restricted and would experience severe disruption as a result of the proposed project. The City must therefore take exception to the finding in the DEIR that this impact would be insignificant. | 8
2. The City already has suffered the affects of construction of an overpass within a commercial area (Rosecrans Avenue overpass at Alameda Street) and is therefore well aware of the negative impacts such a structure causes. Alternative 1.0 will add at least four more such structures to the City, primarily within commercial areas. These overpasses are visually intrusive and aesthetically displeasing, and impact negatively on neighborhood perception and pedestrian access. Alternative 1.0 will have a significant impact on adjacent neighborhoods.

3. This alternative would result in the greatest loss of jobs within the City due to the loss of commercial parcels and displacement of businesses.
4. This alternative would have the greatest impact on commercial activity, especially within the City's CBD. It would also have the greatest impact on industrial land within the City. The City would therefore suffer a significant reduction in revenue due to a loss in the amount of retail sales and property tax revenues.
5. This alternative would produce the greatest amount of noise due to an at-grade trainway and vehicular traffic.
6. The sound walls required as a result of this alternative would create aesthetically displeasing structures to the urban environment and would add to the isolation of the City's neighborhoods.
7. This alternative would result in the greatest number of residential displacements.

The following concerns emerge upon review of Alternative 2.1A (depressed trainway) and give rise to a number of additional mitigation measures which should be included in the DEIR.

1. Provide measures to address vandalism and criminal acts around trench constructed for depressed trainway.
2. Provide measures to address noise created as a result of vehicular traffic along the corridor.
3. Provide measures for additional fire fighting facilities (i.e., water mains, hydrants, special access ways) along trainway.
4. Provide measures pertaining to traffic signalization along the corridor and coordination of such signalization requirements with the City of Compton Department of Public Works.
5. Provide measures pertaining to the preemption of traffic signals for police, fire, and ambulance response.
6. Provide measures pertaining to landscaping of trenches and fences and screening of both sides of the trainway trench with tall shrubs and trees to minimize noise and air pollution and make project more aesthetically pleasing.

7. Provide measure that would establish a trust fund to assist in economic revitalization and infrastructure improvements in communities that would suffer economic destabilization as a result of the proposed project. The trust fund could also be used to help finance additional fire station(s) east of the San Pedro Branch right-of-way, to further assist residents that would be displaced as a result of the proposed project, to promote job skills training, business retention, expansion and preservation, to promote construction of affordable housing, and to provide scholarship programs for school children.
8. Provide measure pertaining to the addition of pedestrian overcrossings to reduce impact of neighborhood isolation.
9. Provision and development of parking lots adjacent to business districts to compensate for loss of off-street parking as a result of the proposed project.
10. Development of parkland within City to compensate for the loss of land and recreational opportunities at Wilson Park (located along the east side of Alameda Street east of Compton Boulevard).
11. Retrofitting of buildings and structures considered to be sensitive receptors, such as residential units, schools, and community facilities, located along the San Pedro Branch right-of-way.
12. Provide measure to address soil stability problems. The soil in Compton between Alondra Boulevard and El Segundo Boulevard is subject to heavy vibration that carries several hundred feet east and west.
13. The City through its Architectural Review Board should be given design authority for soundwalls, landscaping, and architectural treatment of structures which will be constructed as part of the proposed project.
14. Anti-graffiti paint should be utilized on project-related structures.

The City recognizes that the project represents a major needed improvement in the regional transportation system. The project, however, also represents a major challenge to both ACTA and the City in ensuring that its wide range of impacts, some of which are quite significant, are addressed and mitigated and that the quality of the City's environment is protected rather than degraded as a result of the project.

By channeling port traffic along the Alameda Corridor the project will result in a regional reduction of highway and traffic congestion, air pollution, vehicle delays, and noise in residential areas, at Compton's expense. As a corridor city, Compton will not enjoy the same project advantages that would be enjoyed by non corridor cities, but will be expected to absorb all of the impacts that the project will create.

10

The San Pedro Branch right-of-way already presents a physical barrier which divides the City. The transportation improvements proposed by ACTA under the Alameda Corridor Project will only magnify existing problems and create further obstacles to planning, development, provision of services, safety, and quality of life in the City of Compton. As you are aware, Compton's physical environment and citizenry have already sacrificed heavily as a result of previous transportation projects. The environment has been impacted as a result of the Los Angeles County Transportation Commission's construction and operation of the Blue Line. Residential neighborhoods have been split and isolated, the road network has been interrupted, and citizens have been subjected to noise and safety hazards.

11

The health, safety, and welfare of our citizens and the protection of their neighborhoods, as well as the viability of their community, would be jeopardized if the project were approved without inclusion and consideration of the issues outlined above. In the absence of such the project would be lacking adequate mitigation measures and the City could not properly assess, analyze, and prepare for the impacts that the project will have on our landscape and population.

The City of Compton would like to thank ACTA for preparation of the DEIR and for giving the City the opportunity to respond to its contents.

Sincerely,



HOWARD CALDWELL  
CITY MANAGER

HC/GB



## COMPTON POLICE DEPARTMENT

301 South Willowbrook Avenue  
Compton, California 90220  
(213) 605-5600

WALTER TUCKER, III  
Mayor

### COUNCIL PERSONS

OMAR BRADLEY EXT. 5204  
PATRICIA A. MOORE EXT. 5205  
BERNICE WOODS EXT. 5206  
JANE D. ROBBINS EXT. 5207

HOWARD CALDWELL EXT. 556  
City Manager

TERRY R. EBERT, EXT. 5660  
Chief of Police

Ref. 92-10-31  
3.0

## CITY OF COMPTON

October 12, 1992

TO: CITY MANAGER  
FOR: SPECIAL ASSISTANT TO CITY MANAGER  
FROM: CHIEF OF POLICE  
SUBJECT: ALAMEDA CORRIDOR  
ENVIRONMENT IMPACT MEETING

On September 23, 1992, Detective Michael Markey from the Department's Traffic Division attended a meeting concerning the Alameda Corridor. The meeting was held at the City of Lynwood Civic Center to discuss the environmental impact report concerning grade crossing changes. The meeting involved a brief outline of the project and input from attendees as to the environmental impact report and proposed grade crossing changes. The committee then asked for input and questions relative to the project informing the attendees that their questions would be answered by correspondence at a future date.

Detective Markey spoke to the committee members concerning the traffic mitigation problems involving the construction process and completion. He asked whether the arterial roadways of Compton, Alondra, and Greenleaf would all require changes to grade crossings. Another focus of attention was whether the residential crossover streets such as Elm, Pine, and others would be maintained or removed. Preface was made that these were commonly used by public safety for vehicle crossings. He expressed concern as to the impact that would occur, if removal of these crossings were made.

12

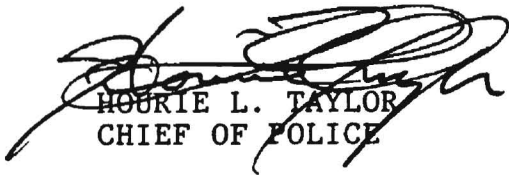
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He then spoke on the completed Rosecrans overpass crossing as to the traffic problems that have arisen. The focus was concerned with the practice that vehicles were making U-turns at the bottom of the overpass causing traffic congestion and collisions. He also stated that due to the length of the overpass, a vehicle having to go down a side street or turn around was required to go several blocks out of the way. The overpass was discussed concerning vehicles driving on the wrong side of the roadway due to no visible traffic regulation signs posted.

Detective Markey suggested that advance notice to public safety agencies needed to be improved and he made a final comment that the repressed train way would probably help mitigate any serious traffic problems. Fact sheets are appended to this document which were handed out at the meeting.

13

  
HOURIE L. TAYLOR  
CHIEF OF POLICE

  
HOWARD CALDWELL  
CITY MANAGER



# CITY OF LONG BEACH

DEPARTMENT OF PLANNING & BUILDING

333 WEST OCEAN BLVD. • LONG BEACH, CALIFORNIA 90802

(213) 590-8851

September 30, 1992

Alameda Corridor Transportation Authority  
Gill V. Hicks  
General Manager  
6550 Miles Avenue, Room 113  
Huntington Park, CA 90255

Subject: DEIR Alameda Corridor Project

Dear Mr. Hicks:

Thank you for the opportunity to review the Alameda Corridor DEIR.

Long Beach continues to support the Alameda Corridor project as the least impacting alternative to reducing impacts from continued Los Angeles and Long Beach Harbor growth.

The DEIR provides substantial documentation of the evaluation process used to select the Alameda Corridor as the least impacting route over several other alternative routes studies. The less desirable routes were then evaluated in the Alternatives section consistent with the CEQA guidelines.

The preparation and circulation of the DEIR on the Alameda Corridor project is a major step in resolving the rail and truck traffic impact problem. We concur that the remaining issues that still need to be resolved are key to adopting and constructing the corridor project, i.e. at-grade or depressed rail line, rail line acquisition, funding, project phasing, and grade separation between rail line and commuter rail.

The Department of Planning and Building finds that the DEIR is comprehensive in its discussion of the environmental impacts, while providing supportive background and setting information. The DEIR meets CEQA guidelines and should be certified.

1 However, the DEIR should be expanded more to present the adverse neighborhood, roadway and rail line impacts if a consolidated corridor is not constructed. These impacts include: (1) air pollution, noise, safety hazards, vibration, visual, land use, transportation impacts to residential neighborhoods; (2) truck traffic congestion and hazards on local roadways and freeways; and (3) train traffic delays at non-grade separated crossings. All these issues could be addressed in the No Build Alternative section.

Alameda Corridor Transportation Authority  
Gill V. Hicks  
September 30, 1992  
page 2

Probably the single most important unresolved issue is project funding. Securing proper funding would resolve many of the design issues. Subsequent to Certification of the Final EIR, ACTC's preparation of the proposed detailed financial plan is an equally important document in realizing a solution to the existing adverse impacts.

2 An important evaluation criteria of the financial plan should be a funding source that permits the construction of the corridor within the immediate future to short circuit lengthy time delays.

Because of the unpredictability of funding, continued port development and escalating import/export market, Long Beach continues to support a surcharge on imports/exports, or a combination of funding that includes a surcharge, to mitigate port commerce impacts in the absence of adequate alternative funding sources. As previously indicated in reviewing DEIR's for other port developments, this process would allow the selling of development bonds, which could be retired by the revenue stream produced by the shipping surcharge.

Long Beach appreciates being included in the evaluation process and would appreciate receiving copies of the Final EIR, financial plan and other documents produced by the ACTC on the corridor project.

Sincerely,

  
Robert J. Paternoster  
Director  
Planning and Building Department

RJP:jm

# CITY OF LOS ANGELES

CALIFORNIA



TOM BRADLEY  
MAYOR

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ROBERT S. HORII  
CITY ENGINEER  
ROOM 800, CITY HALL  
LOS ANGELES, CA 90012

Date: OCT - 5 1992

Alameda Corridor Transportation Authority  
Gill V. Hicks, General Manager  
6550 Miles Avenue, Room 113  
Huntington Park, California 90255

Mr. Hicks:

### ALAMEDA CORRIDOR - REVIEW AND COMMENT ON THE DRAFT ENVIRONMENTAL IMPACT REPORT

Thank you for the opportunity to review and comment on the above referenced project. Following are the comments of the Bureau of Engineering:

- 1 - Change page 1-7, paragraph 3, first line from ... "Widening of Henry Ford Avenue from the Terminal Island Freeway"... to "resurfacing of Henry Ford Avenue from the north end of the Dominguez Bridge".
- Change page 3-15, last paragraph, line 3 from ... "Alameda Street is classified as a secondary highway"... to "Alameda Street is classified as a major highway".

- 2 The Bureau agrees that a depressed trainway would lessen the impacts, especially operational impacts, of this project on the adjacent properties and communities. Other than Alternative 1.0, Alternative 2.2 appears to have the greatest impact on residences (as well as industrial) and is therefore not recommended by the Bureau as the preferred depressed trainway alternative. When designing the depressed trainway alternatives, it was not clear if the local sewers crossing Alameda Street and Long Beach Avenue had been considered with regards to gravity flow and their depth. It may be necessary with a depressed trainway to provide pump stations if the utilities are placed at a certain depth that inhibits gravity flow.
- 3

If you have any question, please contact Dorothy Meyer at (213) 485-6556.

Sincerely,

ROBERT S. HORII  
City Engineer

By

ANDRES SANTAMARIA  
Division Engineer  
Project Management Division

RSH/AS/DM:s

cc: Gary Maner, Central District Engineering  
Louie Yamanishi, Harbor District Engineering  
Councilwoman Joan Milke Flores  
Councilwoman Rita Walters

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CALIFORNIA



TOM BRADLEY  
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October 1, 1992

Gil Hicks, General Manager  
Alameda Corridor Transportation Authority (ACTA)  
6550 Miles Avenue, Room 113  
Huntington Park, CA. 90255

Dear Mr. Hicks:

### ALAMEDA CORRIDOR TRANSPORTATION PROJECT REVIEW OF DRAFT ENVIRONMENTAL IMPACT REPORT (DEIR)

In reviewing your draft environmental impact report (DEIR) for the Alameda Corridor Transportation project, we have a major concern with this project's impact upon the corridor's terminus areas. More specifically, while the project seeks to improve the movement of trucks, automobiles, and trains along the corridor between the port-area (southern portion) and the Interstate 10 freeway (northern portion), it fails to adequately provide for their movement upon reaching major destination points, most notably Central City. Segment A of both Alternatives 2.1A and 2.2 illustrates that the corridor will move the traffic either to or from this area just south of Interstate 10; however, there is little analysis on the movement of traffic in the area north of the corridor's terminus.


The emphasis appears to be on the movement of traffic along the corridor; however, the analysis and, equally important, emphasis should be on the movement of traffic once it exits the corridor. This analysis should be linked with transportation planning efforts conducted in the Central City, as well as other adjoining transportation planning efforts.

Mr. Gil Hicks  
October 1, 1992  
Page 2

All questions can be directed to Mr. Tom Glick at (213) 485-4476 or Dwayne Wyatt at (213) 485-3180.

Very truly yours,

CON HOWE  
Director of Planning

A handwritten signature in cursive script, appearing to read "G. David Lessley". The signature is written in black ink and is positioned above the typed name.

G. DAVID LESSLEY  
Principal City Planner

CH:GDL:DW:TG:tg

cc: Rita Walters, CD# 9  
Dan Beals, CRA

# CITY OF LOS ANGELES

CALIFORNIA

**DEPARTMENT OF  
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GENERAL MANAGER  
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JILL L. RATNER

October 15, 1992

Mr. Gill Hicks, General Manager  
Alameda Corridor Transportation Authority  
6550 Miles Avenue, Room 113  
Huntington Park, CA 90255

Dear Mr. Hicks:

The Environmental Affairs Department of the City of Los Angeles has reviewed the Draft Environmental Impact Report (DEIR) and has prepared the following comments for analysis and/or inclusion in the final EIR:

**1 Preferred Alternative**

Based upon our review of the DEIR, the Environmental Affairs Department recommends that the environmentally superior and preferred alternative (Alternative 2.1A) be selected. In particular, we believe that this alternative better meets the project objectives because 1) it results in the least disruption to neighboring communities both in terms of residential and commercial displacements as well as noise and visual impacts and 2) minimizes localized traffic congestion and air pollution impacts as compared to the other alternatives. As identified in the DEIR, Alternative 2.2 would result in 1) significant disruptive impacts to residential neighborhoods, particularly in the Pueblo del Rio which is a significant historical and cultural resource as well as an important component of the City's affordable housing, 2) significant noise and vibrational impacts in residential neighborhoods, particularly on the Lillian Street Elementary School, and 3) the potential to significantly increase local carbon monoxide concentrations on a larger number of residences than the other alternatives. We would, therefore, recommend against Alternative 2.2.

**2 Noise Barriers**

The Environmental Affairs Department is concerned over the aesthetics of the noise barriers and their potential impact to separate and blight communities. Native, drought tolerant landscaping should be included in every opportunity to serve as both a means of mitigating the aesthetic impacts of the noise barriers as well as serving to deter graffiti. Additionally, the final EIR should identify the party responsible for maintenance and upkeep of the noise barriers.

3 Local Air Quality Impacts

While we recognize that the project as a whole will benefit the air quality in the region, the draft EIR acknowledges that the project will result in localized carbon monoxide impacts. We would strongly urge, therefore, that the ACTA move rapidly to electrification of the rail lines and that the final EIR consider this as a possible mitigation.

4 Cumulative Impacts

The final EIR should include a detailed discussion of the potential cumulative impacts from both construction and operation of the Alameda Corridor project, particularly with reference to the proposed Pacific Pipeline project. We strongly recommend that ACTA minimize the cumulative impact of the project on the surrounding communities.

5 Mitigation Monitoring

While not expressly required under CEQA, a detailed draft mitigation monitoring program should be included in the final EIR. The mitigation monitoring program should identify the funding sources and agencies responsible for monitoring each element of the program. In addition, not only should the plan describe how the measures will be monitored, but it should also include a means of verifying that the measures are effective. The mitigation monitoring program should provide a plan for additional measures if the recommended mitigation measures prove not to effectively mitigate the impacts for which they are prescribed. We would strongly urge the Alameda Corridor Transportation Authority to develop this mitigation monitoring program in conjunction with the City of Los Angeles for those impacts that affect and/or are located in the City.

6 Reclaimed Water

The draft EIR states that water will be used for dust suppression and equipment washing. In order to mitigate the effect of using potable (ground or surface) water for this purpose, it is recommended that reclaimed water be used instead where available and permissible. Such water is readily available from the Los Angeles Department of Water and Power at their Tillman and Glendale Treatment Plants.

7 Environmental Contamination

In addition to the 46 high priority hazardous waste sites identified in the DEIR, additional contaminated soils will be found. The final EIR must address what actions will be taken upon discovery of contamination during construction. A response plan that addresses worker safety, protection of the community, airborne contamination from construction operations, and that specifically details the measures that will be taken to determine the nature and extent of the contamination should be included in the final EIR.

Additionally, it is stated in the draft EIR that all environmental contamination found along the corridor will be cleaned, even though the responsible party is not always identified. Will the Alameda Corridor Transportation Authority first clean each site and then seek reimbursement or will cleanup be delayed until the responsible party/parties is/are identified?

The Environmental Affairs Department is very supportive of efforts that will achieve



Mr. Gill V. Hicks  
Comments on the Alameda Corridor DEIR

October 15, 1992  
Page 3

improved air quality and reduced congestion in the region. We thank you for this opportunity to comment. If you have any questions or comments, please direct them to Gary Gero of my staff at (213) 485-9956.

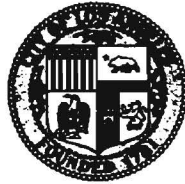
Sincerely,

A handwritten signature in cursive script that reads "Lillian Y. Kawasaki".

Lillian Y. Kawasaki  
General Manager

cc: Councilmember Rita Walters, Council District 9  
Councilmember Joan Milke Flores, Council District 15

CITY OF LOS ANGELES  
CALIFORNIA



TOM BRADLEY  
MAYOR

DEPARTMENT OF  
TRANSPORTATION  
ROOM 1200, CITY HALL  
LOS ANGELES, CA 90012  
(213) 485-2265  
FAX (213) 237-0960

September 8, 1992

Alameda Corridor Transportaton Authority  
Gill V. Hicks, General Manager  
6550 Miles Avenue, Room 113  
Huntington Park, CA 90255

**DRAFT ENVIRONMENTAL IMPACT REPORT (DEIR) FOR  
THE ALAMEDA CORRIDOR.**

The Transportation Studies Division, Department of Transportation (LADOT) of the City of Los Angeles (City) has reviewed the Draft Environmental Impact Report (DEIR) for the Alameda Corridor. The following comments are submitted for further analysis and/or inclusion in the final EIR:

- 1) Intersection level of service analyses along Alameda Street between 25th Street and Santa Monica Freeway Westbound On Ramp should be conducted and included in the DEIR. 1
- 2) Displaced residents or businesses might impact traffic circulation in areas that where will be relocated. Appropriate mitigation measures should be proposed to relieve their impacts at the new locations. 2
- 3) Local circulation and neighborhood protection are key concerns to LADOT. The DEIR briefly describes potentially significant problems associated with changes and elimination of existing corridor access points. These problems are due to intrusion of corridor traffic into residential neighborhoods adjacent to the corridor and increased travel distance to access the Alameda Corridor due to closure of crossings and streets, grade separations, and separation of northbound and southbound lanes. However, the DEIR does not propose any mitigation measures to alleviate the resultant impacts. 3



- 4) If Alternative 2.2 is selected, segments on both Long Beach Boulevard and Alameda Street between Slauson Avenue and 25th Street will be improved. These two roadways will become significant attractors to new traffic and therefore create enormous burdens on east-west arterials connecting them. Therefore, 41st Street, Slauson and Vernon Avenues between Long Beach Boulevard and Alameda Street should be widened to their designated widths to handle the excess demand. 4
- 5) Affected businesses and homes that will be disrupted during construction should receive advance written notice of temporary traffic disruptions. 5
- 6) Traffic control plan should be provided for each construction phases. The plan should identify the haul routes, the estimated number of truck trips and measures to facilitate truck movement in and out of the construction area. The plan will be reviewed and approved by the affected local jurisdiction. 6
- 7) Signal warrant analysis may be required at locations where proposed access roads intersect major streets. In addition, level of service analysis should be conducted taken into account number of signal phases that will be required. 7
- 8) Significant impact criteria used by LADOT are different than those stated in the DEIR. Below are the criteria that should be followed when analyzing intersections within the City of Los Angeles: 8

FINAL V/C RATIO	FINAL LOS	PROJECT RELATED INCREASED
< 0.70	A, B	> 0.06
> 0.70 to 0.80	C	> 0.04
> 0.80 to 0.90	D	> 0.02
> 0.90	E, F	> 0.01

For Congestion Management Program monitored locations:

>1.00	F	> 0
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- 9) Appendix VII illustrates traffic geometric improvements for crossings and street access to the corridor. In addition to that information, we request that street and lane widths, and the limits of the improvements be provided for each roadway shown in the appendix. 9

- 10) The Environmental Impact Report should comply with the proposed Transportation Impact Analysis guidelines of LACTC's draft Congestion Management Program. 10
- 11) LADOT requests that all proposed grade separations over depressed railroad segments within the City be provided with "bullet nose" openings and separated left-turn channelization on Alameda Street. The separated left-turn channelization would facilitate single intersection designs that will improve traffic circulation at these crossings. 11
- 12) For Alternative 1, local streets which are used as access roads to the corridor will be subject to high vehicle volumes, thereby increasing the chance of vehicle and pedestrian conflicts. The report should provide mitigation measures to minimize the conflicts. 12
- 13) LADOT endorses the construction of pedestrian bridges rather than pedestrian tunnels to facilitate pedestrians crossing Alameda Corridor in the vicinity of schools and any recreation centers. Past experience indicates that pedestrian tunnels encourage loitering. The report mentions that pedestrian flow into schools and centers create problems when crossing the corridor. However, the report does not provide for further analysis into this problem. LADOT requests that further study be conducted to ensure the safety of school pedestrians and others when crossing the corridor. 13
- 14) The elimination of on-street parking as well as off-street parking due to property acquisitions create a tremendous shortage of parking spaces along and adjacent to the corridor. Impacts can be significant. Therefore, LADOT requests that a parking study be conducted to examine ways to restore the losses in both on-street and off-street parking. It is vital that lost parking due to partial takes of properties not be replaced by on-street parking space. 14

LADOT reiterates concerns about Alternative 2.2 (Wilmington Diversion Alignment) because the southern end of Long Beach Boulevard is primarily a residential zone. It is recognized that pedestrian volume is significant and potential rail and pedestrian conflicts are high. Although mitigation measures have been proposed to alleviate impacts to the natural and socio-economic environment if Alternative 2.2 is selected, the remaining residents will still be subject to undue hardship. 15

Numerous typographical errors are found under Transportation and Circulation Element sub-chapter in the DEIR, please have them corrected before submitting the final EIR. If you have any questions regarding these comments, please contact Benjamin K. Chan at (213) 237-0645.

16



T.K. Prime  
Senior Transportation Engineer

bkc:a:\alacorr.wp

cc: Councilwoman Rita Walter, CD 9  
Councilwoman Joan Milke Flores, CD 15



**HOUSING AUTHORITY** OF THE CITY OF LOS ANGELES  
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JOSEPH SHULDINER

September 29, 1992

Mr. Gill Hicks  
General Manager  
Alameda Corridor Transportation Authority  
6550 Miles Avenue, Room 113  
Huntington Park, CA 90255

Dear Mr. Hicks:

The Housing Authority of the City of Los Angeles (HACLA) appreciates the objectives of the Alameda Corridor Transportation Authority and recognizes the efforts that have been invested in the preparation of the Draft Environmental Impact Report (DEIR) for the proposed Alameda Corridor Project.

We wish to submit that the HACLA is not categorically against the development and construction of the Alameda Corridor Project, and we grant that the expected long-term benefits will outweigh the short-term difficulties associated with the project. However, in behalf of the low-income residents of the Pueblo Del Rio housing development (which is owned and operated by the HACLA) we wish to go on record that we oppose any design alternative that will adversely impact any of the HACLA's housing developments.

Considering the great demand for, and the very limited resources available for affordable low-income housing in the City of Los Angeles, any loss of or negative effects on the HACLA's public housing units will be a great disservice to the City's low-income families. Therefore, the HACLA supports the DEIR's recommendations that Alternative 2.1A should be adopted, relative to the other alternatives evaluated.

Thank you.

Sincerely,

  
JOSEPH SHULDINER  
Executive Director



# City of LYNWOOD

*A City Meeting Challenges*

11330 BULLIS ROAD  
LYNWOOD, CALIFORNIA 90262  
(310) 603-0220



October 7, 1992

Mr. Gill V. Hicks  
General Manager  
Alameda Corridor Transportation Authority  
6550 Miles Avenue, Room 113  
Huntington Park, CA 90255

Subject: Draft Environmental Impact Report  
Alameda Corridor Project

Dear Mr. Hicks:

Presented herein are comments of the City of Lynwood on the Alameda Corridor Draft Environmental Impact Report prepared by Myra L. Frank & Associates, Inc.

1. Introduction (Section S.1):

The report seems to downplay the purpose of the entire Alameda Corridor Project which is clearly the current and planned growth of the ports of Long Beach and Los Angeles. 1

2. Alternatives (Section 5.2):

All of the alternative configurations were supposed to be evaluated in terms of their ability to satisfy the goals and criteria developed by the ACTA governing board. However, on page S-5, the report stated, "But the evaluation demonstrated that all the alternatives performed nearly the same; thus additional factors had to be considered". In section 2.4.1, with only a very sketchy description, it went on to conclude the three alternatives in the report. Even though, Appendix G, Alternatives Analysis by DMJM/M&N was cited, the report itself, should contain more complete information. 2

3. I-105, On and Off Ramps at Alameda Street:

In the project description of the report, for all alternatives, on and off ramps at Alameda Street have been mentioned as "recommended related projects." It is our opinion that on and off ramps at Alameda Street are part of the mitigation of Alameda Corridor Project that would reduce impacts on traffic, circulation and improve emergency responses of Sheriff's Department and Fire Department. 3

4. Liquefaction and Other Soil Instability Issues:

A liquefaction site specific study is needed to verify the potential for liquefaction in the vicinity of Imperial highway. Existing data from Caltrans's I-105 construction and the relocation of Imperial highway may be useful and should be incorporated into this report (page 4-14). 4

5. Groundwater Resources:

Dewatering is considered to be the most practical method of groundwater control. During dewatering operations, the groundwater encountered may become contaminated (page 4-32). Would there be any impact on nearby water supply wells during these operations? A survey and study should be required. 5

6. Carbon Monoxide Concentrations:

We are concerned about the exception shown in Table 4-25 that the projected 8-hour CO concentrations at Alameda Street/Santa Ana Boulevard would exceed the state and federal ambient air quality standards in the year 2020. The question as to the applicability of the Lynwood Air quality Monitoring Station data for this project needs to be elaborated (page 4-40). 6

Rail electrification should be a measure to reduce air pollutants and air toxins.

7. Fugitive Dust Emissions:

Dust emission threshold set by SCAQMD for construction activities is 150 lbs/day. Table 4-12 shows that all alternatives would exceed this threshold by a substantial margin (1,696 lbs/day for alternative 1 and 2,167 lbs/days for all others). In potential mitigation measures, Table 4-27, no overall evaluation demonstrates the threshold would be met. Statement such as, "suspension of all excavating and grading operation when wind speeds are excessive" is too vague to implement. 7



8. Noise Impact Zones:

From Table 4-40, in section C between Tweedy Boulevard and Imperial Highway in the year 2020, why is the number of residence in noise impact zones still high with the proposed mitigation measures? In page 4-103 and Table 4-43, the discussion of mitigation measures at the above location is vague for trench alternatives.

9. Ground-Borne Vibration:

Table 4-48, summary of ground-borne vibration impact assessment and mitigation of vibration does not include a survey of existing industries in the area that are sensitive to vibration and the required respective mitigation measures. Westec Gear at Alameda and Imperial Highway is one of these industries that need to be contacted.

10. City Boundary:

Figures 5-13 and 5-20, and page 5-32 denotes erroneous City of Lynwood boundary between 103rd street and 124th street.

11. Economic Growth:

Is the 1989 SCAG's Regional Growth Management Plan still realistic? (page 5-327). If not, the report needs to be revised accordingly.

12. Project Cost and Funding:

The project cost is listed between \$1.185 and \$1.329 billion dollars (Section S.5.3) not including railroad rights-of-way. Although there are three volumes of project cost prepared by DMJM/M & N in 1991 (listed in Appendix E), there should be more discussion in this report on the project cost for different alternatives. Furthermore, the whole project started from the projected growth of the ports of Long Beach and Los Angeles and the required mitigation to reduce the projected impacts, it is therefore very clear that the ports of Long Beach and Los Angeles should bear the cost.

13. On-Street Parking Impacts:

As stated on page S-191 and Table 5-35, segment C would experience the least loss of on-street parking spaces, removing between 154 and 166 of the existing 1,148 spaces. However, during the discussion of typical sections of alternatives, (Sections 3.2.1, 3.3.1 and 2.4.1 and Figures 3.7, 3.13 and 3.18) no provisions of parking lanes were discussed.

14. Effects on Law Enforcement:

The report on page 5-234, seems to downplay the delay of the overall Sheriff's response time in Lynwood. Lynwood Sheriff's Department will be eventually relocated to the Lynwood Regional Justice Center when the center is complete in 1994. As shown in Table 5-45, the City of Lynwood would lose three of its existing cross streets under the at-grade trainway alternative and half of its existing cross streets under the depressed trainway alternatives. Lynwood Sheriff's emergency service would be significantly impacted. 14

15. Effects on Fire Services:

We totally agree on the conclusion that the impact on the Lynwood Fire Department's response time is potentially significant. A mutual aid program with other fire departments or redefine fire jurisdictions could minimize this impact. 15

16. Visual impacts:

Graffiti on the proposed sound walls and vertical walls along the trench for the trainway should be considered as visual impacts on the project. 16


17. Water Distribution System:

The needs to relocate water system in the area for the project would lead to the question on the ability of existing water supplies to sustain projected growth in the area. 17

In summary, we are supporting alternative 2.1A, in the conclusion that it is environmentally superior. The City would like to make it clear that all future liabilities relative to rail operations in the corridor area will continue to be the responsibility of the railroad companies. 18

If you should have any questions, I can be reached at (310) 603-0220, ext. 287.

Sincerely,

  
Emilio M. Murca  
Director of Public Works



# City of South Gate

8650 CALIFORNIA AVENUE • SOUTH GATE, CA 90280-3075 • (213) 563-9529  
FAX (213) 567-0725

DEPARTMENT OF COMMUNITY DEVELOPMENT  
ANDREW G. PASMANT  
DIRECTOR

October 7, 1992

Mr. Gill V. Hicks, General Manager  
ALAMEDA CORRIDOR TRANSPORTATION AUTHORITY  
6550 Miles Avenue, Room 113  
Huntington Park, CA. 90255

**SUBJECT: ALAMEDA CORRIDOR – DRAFT ENVIRONMENTAL IMPACT REPORT**

Dear Mr. Hicks:

Pursuant to your request, as required by the California Environmental Quality Act, the City of South Gate's Department of Community Development has reviewed the Alameda Corridor Draft Environmental Impact Report (DEIR). It is our understanding that the Alameda Corridor Transportation Authority (ACTA) is proposing railway and highway improvements along the Alameda Corridor between downtown Los Angeles and the Ports of Los Angeles and Long Beach. The purpose of this letter is to provide the ACTA with the City's comments on the DEIR.

## ISSUES

Upon completing our review of the DEIR, we have identified several issues associated with the implementation of the Alameda Corridor project. They are as follows:

- The City of South Gate will continue to encourage the development of industrial uses along Alameda Street, between the Southern Pacific Santa Ana Branch and Southern Avenue and between Tweedy Boulevard and Seminole Avenue.
- The City of South Gate intends to protect the residential properties between Southern Avenue and Tweedy Boulevard.

Thus, our comments are centered around these issues.

## COMMENTS

1. Potential Impact on Development along Alameda Street.

On September 22, 1986, the City Council of South Gate approved a Specific Plan to permit the development of a 92 acre planned complex of industrial and commercial uses

(known as the South Gate Business and Industrial Park) located on the east side of Alameda Street between Tweedy Boulevard and Seminole Avenue, at the property formerly occupied by the General Motors Plant. The approved circulation system of this development included: 1) the construction of two (2) streets (Wisconsin Avenue and Sequoia Drive) which would be accessed from Alameda Street; and 2) the utilization of two (2) rail spurs from the site to the Southern Pacific Railroad.

In addition, the City of South Gate Redevelopment Agency is currently processing a proposal to include the properties along the east side of Alameda Street between the Southern Pacific Railroad Santa Ana Branch and Southern Avenue, including the former Firestone Tire Plant, within the Redevelopment Project Area in order to pursue the industrial and commercial revitalization of the Alameda Corridor. Several of these properties also provide rail spurs onto the Southern Pacific Railroad.

Since the South Gate Business and Industrial Park and the former Firestone Tire Plant are critical sites for the economic enhancement of the City, in terms of creating jobs and revenue, the City of South Gate intends to preserve the developments opportunities on these properties and minimize any potential constraints, such as limited access.

**Land Use Impacts.** In order to establish an understanding between the City of South Gate and the ACTA, the DEIR should thoroughly discuss how the access onto Alameda Street will be preserved, as well as how the rail spurs will be maintained for utilization.

**Right-of-Way Acquisition.** Based on your telephone conversation with Ms. Ida Ruiz of our Redevelopment Agency Staff, it is our understanding that the implementation of the project (especially Alternative 2.1A) does not involve right-of-way acquisition along Alameda Street within our City Boundaries.

2. **Potential Impacts to Adjacent Residents.**

As identified on Figure 5-4 (page 5-5), residential uses currently exists along the east side of Alameda Street, between Southern Avenue and Tweedy Boulevard, which are directly impacted by activities along the Alameda Corridor.

**a Noise Impacts.** As noted page 4-102, the project will cause noise impacts to a large number of residents within this area and a barrier is required to mitigate the noise impacts. Therefore, the DEIR should clearly explain and illustrate the proposed barriers to mitigate the noise impacts.

**b Visual Impacts.** Since the implementation of the project requires the construction of noise barriers, the design of the barriers should be clearly illustrated. In order to ensure that the aesthetic quality of the neighborhoods is not affected.

## CONCLUSION

In conclusion, the City of South Gate supports Alternative 2.1A based on the following:

- Since it has been identified by the DEIR as the "environmentally superior alternative" and it provides less potential impacts to the City.
- Since it appears to protect the future development of both the South Gate Business Industrial Park and the former Firestone Tire Plant.
- Since it appears to preserve the utilization of the existing rail spurs and maintains access to Alameda Street.
- Since it does not require right-of-way acquisition along Alameda Street within our City Boundaries.
- Since it appears to be more sensitive to the potential impacts on the existing residences.

On behalf of the City of South Gate, I would like to thank the Alameda Corridor Transportation Authority for providing us with the opportunity to review and comment on the Alameda Corridor Draft Environmental Impact Report. Should you have any further questions regarding our comments, please do not hesitate to contact Oliver Mujica at (213) 563-9562.

Sincerely,

ANDREW G. PASMANT  
Director of Community Development

By:

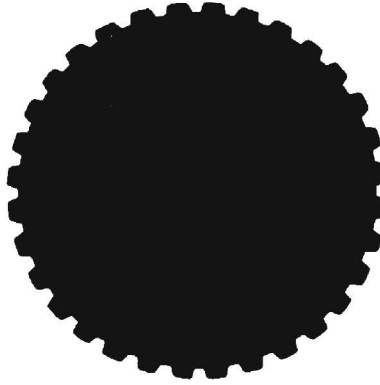
  
Oliver Mujica, Associate Planner

cc: Todd Argow  
Andrew G. Pasmant  
James A. Biery  
Steve Lefever  
Ruben M. Lopez

CITY COUNCIL  
LEONIS C. MALBURG  
Mayor  
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W. MICHAEL McCORMICK  
Councilman

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BRUCE V. MALKENHORST  
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## CITY HALL

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October 7, 1992

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*In Reply Refer to:*

**FAXED AND MAILED**

J-2

Mr. Gil V. Hicks  
General Manager  
Alameda Consolidated Transportation Authority  
6550 Miles Avenue, Room 113  
Huntington Park, CA 90255

Gentlemen:

The City of Vernon has reviewed the Draft Environmental Impact Report (DEIR) for the Alameda Corridor Project. We appreciate the opportunity to comment on its contents. Below we have detailed areas of the report that we feel have not been adequately studied. It is our opinion that the report consistently goes into great detail on the possible adverse effects to residential properties while glossing over the effects to the commercial and industrial properties. We feel that all property owners along the corridor should be given equal consideration.

1. With respect to the two "areas of controversy" (the depressed trainway vs. an at-grade trainway and the Vernon diversion) we believe that the description of the first is too short. The italicized paragraph on page S-25 refers only very briefly and incompletely to the reasons why the corridor cities prefer the depressed trainway. Although this description occurs in the Summary, there is no expanded discussion of the reasons articulated by the corridor cities in the following chapters. Even the gigantic Chapter 5, which details land use and transportation impacts, does not relate the reasons given by the corridor cities for their "strong feelings."

2. The former Wilmington diversion (originally named for the Southern Pacific Wilmington brand line) now is referred to as the Vernon diversion, and the controversy has been cast as a dispute between the City of Vernon and the City of Los Angeles.



That may be accurate, but the description of the concerns expressed by Vernon again is very brief and incomplete, referring only to the possibility of "extensive property takings." We believe that both the previous letter from Mayor Malburg and the comments of Vernon representatives to the ACTA governing board and technical review committee have discussed the impacts on the existing local transportation system within Vernon and adjacent to Vernon and should be incorporated in the report.

3. With respect to the "issues to be resolved," the discussion of funding for the project (top of page S-29) could not be briefer and there is no further discussion of funding in the later chapters! We would argue that there should be further discussion both in Chapter 2 of the costs of the project from the ports to the cities represented, along with the ports in ACTA which are not mentioned in the existing section on "Economics" at the end of Chapter 5 (pages S-326 through S-338).

4. The project phasing issue is only briefly mentioned, but not discussed, either in the Summary or elsewhere in the DEIR. The report should detail how it was determined that the project should be phased from south to north. The report should also outline why it is recommended that the project completion deadline be the year 2010, and what consequences can be expected if there is a funding shortfall and the northern end of the corridor is completed late or never at all.

5. The summary should make some mention of electrification of the locomotives which will operate within the consolidated trainway. There is a brief mention of electrification at the top of page 4-68 in Chapter 4 (The Natural Environment), along with statement that electrification would decrease freight rail emissions by over 67 percent. In addition, on page 3-69 in Chapter 3 (Project Description), there is the statement that "the corridor has been designed to permit electrification, should it become a reality," but nothing more. In addition no mention of electrification is made in Part 4.4 (Noise) and only the briefest possible mention in Part 4.7 (Energy). Given the air quality problems in the Los Angeles basin, let alone in the corridor cities, electrification should receive more attention.

6. Section S.9 of the DEIR states that Alternative 2.1A is identified as the "Environmentally Superior Alternative". It should be pointed out that the ACTA governing board has not expressed any preference for Alternative 2.1A over Alternative 2.2, and Section 15126 of the CEQA guidelines does not require any such declaration in the DEIR Section S.9 goes on to state that Alternative 2.1A generally has a less intrusive effect in most impact categories, especially in regards to property acquisition and vibration. The City of Vernon questions this statement since no adequate study was completed on the effects of

vibration and noise on industries and it appears that the effects of existing conditions were not taken into account. In addition under Section 5.3.3 Non Residential Displacement the report specifies that Alternative 2.1A would result in a loss of 914,791 square feet and 966 employees. In comparison Alternative 2.2 will result in approximately 384,591 square feet and 587 employees being displaced. Therefore we feel that there should be further study before it is concluded that Alternative 2.1A is the superior choice.

7. Vernon has the following concerns with the configuration of Alternative 1.0:

a. This Alternative requires considerable land acquisition, which the City opposes.

b. Businesses on the east side of Alameda would be virtually cut off to traffic traveling southbound on Alameda Street without major detouring.

c. Have railroad movements on the spur line been studied to show how it will effect traffic?

d. Access routes around underpasses appear to be ill designed, especially at Vernon Avenue.

e. Have access routes been studied to see if they will require widening due to the increase in traffic?

f. Will access routes require signaling where they connect into arterial roadways?

g. Spur tracks to the west side of Alameda are eliminated. How will this affect those industries that require rail traffic?

h. How will the corridor affect traffic on Santa Fe Avenue? A study should be completed to see what improvements may be required due to the increase in traffic. It appears that it will be easier to access business east of Alameda via Santa Fe Avenue versus the complicated detouring off of Alameda.

i. Will there be an increase in traffic accidents since vehicles will be entering and exiting sites from a high speed highway? It appears that frontage roads may be required.

j. During construction it appears that all grade separations in one area will be constructed during the same phase. This may cause extensive traffic problems.



8. Vernon has the following concerns with the configuration of 2.1 through Vernon:

a. The DMJM/MN analysis of comparative access to existing businesses does not fully discuss the fundamental differences between alternatives 2.1A and 2.2. Vehicles may have to travel six to eight blocks extra distance and then make a U turn at the next available cross street and then backtrack to the desired business entrance. Has a study been conducted to see how this will affect the thoroughfare? Can trucks make U turns at the intersections to access properties on the other side of the street? It appears that Alternative 2.2 is superior in regards to property access.

b. Will there be signals at the intersections?

c. How will the at grade drill track effect traffic? There will be no spur track to properties on the west side of Alameda. How will this effect those businesses?

d. Alameda will be a high speed highway. Movement into and out of adjacent properties on the east side of Alameda may cause traffic incidents. It appears that a frontage road may be prudent.

9. Vernon's concerns with Alternative 2.1S configuration revolve around the fact that additional right-of-way is required. There does not appear to be any benefit of this option over Alternative 2.1.

10. Vernon has the following concerns with the configuration of Alternative 2.2:

a. A 38 foot width is shown for the northbound roadway for Long Beach Boulevard. There does not appear to be sufficient traffic on this right-of-way to warrant that wide of a street.

b. On Alameda Street, left turn pockets are not provided at all intersections. Can trucks make U turns at the intersections?

c. Is a 40 foot wide median required for the drill track and turn pockets on Alameda Street?

d. It appears that a frontage road may be required to access properties on the east side of Alameda. This would eliminate truck movements directly onto and off of the high speed highway.

e. Have the effects of the drill track service on traffic on Alameda been analyzed?

f. Can the drill track on Long Beach Boulevard be eliminated? Service can be provided via the drill track on Alameda Street which can transition to the Wilmington Branch via Randolph Street.

g. Has the elimination of the maintenance way been studied? The maintenance way could possibly be replaced with a gantry crane and tunnel access system.

h. Have all alternatives of construction of the trench system been analyzed? It appears that other methods may compare favorably with the steel sheet pile with anchorage method proposed, especially if necessary right-of-way acquisition is reduced.

i. Can a portion of the Long Beach Boulevard roadway be cantilevered over the trench?

j. It appears that a 6° curve can be constructed at the Randolph transition from Alameda street to Long Beach Boulevard without much additional right-of-way being required. This would allow trains to travel at speeds up to 40 mph instead of the design 30 mph being used.

k. With the elimination of the maintenance way or with the cantilevering of the northbound roadway or the narrowing of the roadway of Long Beach Boulevard. It appears that the necessity for right-of-way acquisition would be eliminated for the section of railway paralleling Long Beach Boulevard. This would appear to be a substantial cost savings and may offset increases in construction costs. It is recommended that a cost analysis be performed.

11. Both noise and vibration studies in the DEIR concentrate on effects to residential properties. It is our opinion that the effect on industrial uses should get equal concentration. Noise can easily disrupt office work. Vibration can adversely effect delicate machinery and be annoying to personnel.

In addition there appear to be arithmetic errors in the supporting documents of the DMJM/MN Study report relative to the tabulation of the number of sensitive receptors within the various study alternatives. The study also fails to place the noise and vibration associated with the Alameda Corridor into context with the existing noise and vibration contributors. Even if Alternative 2.1A is constructed there will continue to be

freight rail movements and Metro Blue Line Light Rail System movements along the Long Beach corridor. The implication of the DMJM/MN noise and vibration analysis is that the Alameda Corridor Depressed Trainway will be the dominant contributor of noise and vibrations along the corridor. A more complete analysis may in fact conclude that other existing noise and vibration contributors that will continue to operate after completion of the Depressed Trainway may prove to be the dominant contributor of noise and vibration.

12. Land Acquisition - The report shows the acquisition of parking areas as insignificant adverse impacts. However the City of Vernon has strict parking requirements. Nonconformance with the parking requirements may require demolition of structures to provide room for parking.

13. The limited cost analysis for the corridor makes it quite difficult to compare Alternative 2.2 and 2.1A. Structure costs along with right-of-way and utility relocation costs should be more detailed so that a comparison can be made.

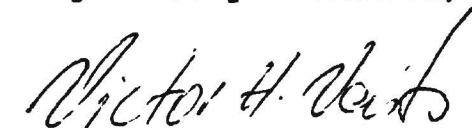
14. There should be more explanation in the report as to why the depressed trainway alternatives are projected to result in more vehicular production of carbon monoxide at locations close to the corridor than the at-grade alternative.

15. Chapter 3 of the report should expound on the existing Alameda roadway. The orientation of the DEIR tends to consider both the Regional and local ground transportation networks not as systems to be accommodated and improved, but as obstacles for the consolidated rail corridor to surmount.

16. The DEIR seems to downplay the cause of the entire Alameda corridor project. The current and planned growth of the Ports of Los Angeles and Long Beach. The report should bring to the forefront that the major beneficiary of the project is the ports.

We thank you for the opportunity to comment on the report.

Respectfully submitted,



Victor H. Vaits  
Director of Community Services

**M e m o r a n d u m**

To : Mr. Tom Loftus  
State Clearinghouse  
1400 Tenth Street, Room 121  
Sacramento, CA 95814

Date : October 2, 1992

File No. IGR/CEQA  
DEIR  
Alameda Corridor  
Ports of Long Beach &  
L.A. to City of Vernon  
Vic. LA-47-VAR

Robert Goodell - District 7

From : DEPARTMENT OF TRANSPORTATION

Project Review Comments

Subject :

SCH# 90011169

Caltrans has reviewed the above-referenced document. Based on the information received, we have the following comments:

Since this is a project which relates to goods movement and requires the involvement of many jurisdictions, we find that the issue of rail consolidation, the funding development and the implementation responsibilities will be critical elements in the success of this project.

Alameda Street is designated as a traversable State highway from Henry Ford Avenue to SR-91 (Artesia Freeway). However, the segment between the Artesia Freeway and the I-10 Santa Monica Freeway is not included as part of the State highway system. Also, Caltrans is currently working with the appropriate transportation agencies to determine the possibility of including the entire Alameda Corridor as part of the National Highway System (NHS).

1 | The report did not include both the AM and PM peak hour volumes for the year 2010. The AM peak hour volumes are important measurements in relation to the regional transportation system's traffic operation which includes the local freeways (I-110 Harbor Freeway, I-710 Long Beach Freeway, I-405 San Diego Freeway, SR-91 Artesia Freeway, the future I-105 Century Freeway, and the I-10 Santa Monica Freeway).

2 | Caltrans is responsible for the right-of-way where the Alameda Corridor Project crosses State highways. Since these crossings may involve grade separations, Project Study Reports as well as Encroachment Permits will be required at each of these crossings.

3 | Caltrans has a project at the interchange of SR-47/SR-103 with Henry Ford Avenue. There is only one railroad track that crosses this interchange. The proposal to add a second track will require realignment of Henry Ford Avenue or SR-47 south of the interchange with new right-of-way acquisition.

Mr. Tom Loftus  
October 2, 1992  
Page Two

4 | It is stated on Page 5-154 that, "The Terminal Island  
Freeway/Henry Ford Avenue intersection is controlled by a 5-  
phase traffic signal". However, in the traffic study for the  
Container Terminal Project, it was specified as a 4-phase  
traffic signal. Please determine the correct intersection  
signal phase.

5 | Finally, the concept in the document encompasses what has been  
earlier negotiated and agreed upon. It is anticipated that the  
Alameda Corridor Project will be implemented by segments or  
phases. Cooperative Agreements for each specific segment or  
phase will be required. This is especially the case since  
different local agencies and jurisdictions are involved.

If you have any questions regarding this response, please call  
Wilford Melton at (213) 897-1338.



for ROBERT GOODELL, CHIEF  
Advance Planning Branch

cc: Gill V. Hicks, Alameda Corridor Transportation Corridor  
6550 Miles Avenue, Room 113, Huntington Park, CA 90255

**SOUTHERN CALIFORNIA ASSOCIATION OF GOVERNMENTS**  
818 West Seventh Street, Ste. 1200  
Los Angeles, CA 90017

October 6, 1992

Mr. Gill Hicks, Executive Director  
Alameda Corridor Transportation Authority  
6550 Miles Avenue, Room 113  
Huntington Park, CA 90255

Dear <sup>Gill</sup>Mr. Hicks:

The following are my comments on the Alameda Corridor Draft Environmental Impact Report Summary, with particular respect to transit impacts.

The section on Mass Transit impacts (P. S-49), is limited to impacts on the local bus system. However, the most significant, and very positive impacts that the Alameda Corridor will have on regional transit development, are related to our long-term ability to develop new urban and commuter rail transit facilities on rights-of-way which will no longer be needed for major, through freight movements between Los Angeles and the port area.

The extent of these benefits vary depending upon the Alameda Corridor alternative considered, as follows.

Potential Transit Benefits From All Alameda Corridor Alignments:

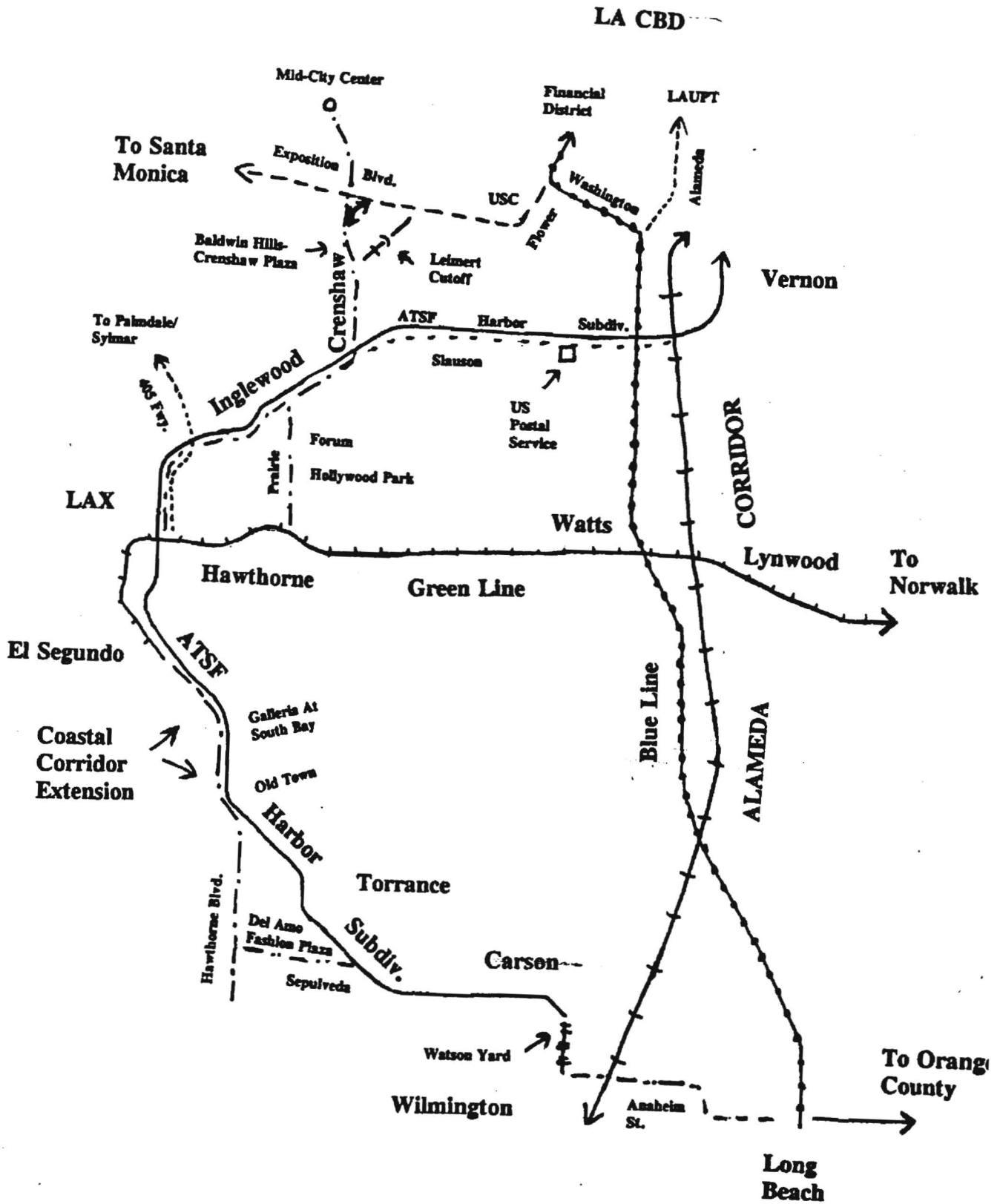
1 A major benefit from implementation of the Alameda Corridor, that applies to all of the consolidation alternatives under consideration, is that it will free the Santa Fe Harbor Subdivision for passenger rail use (light rail or commuter rail). Notwithstanding the fact that the LACTC and ATSF Railway have recently agreed on public purchase of the Harbor Subdivision, there are serious restrictions on the use of the Harbor Subdivision prior to the start-up of the Alameda Corridor, as will be discussed below.

Potential light rail and commuter lines which could utilize the Harbor Subdivision are the following (see also Map 1):

o Green Line/Coastal Corridor. The extension of the Green Line south of Marine Avenue, on the Harbor Subdivision, below Freeman Avenue to 190th Street (the intercept with Hawthorne Boulevard) will facilitate the Coastal Corridor extension down into Torrance, accessing the Galleria at South Bay, Old Town Shopping Center, and the Del Amo Fashion Center. The ATSF line will provide a more direct route between Freeman and 190th, and may allow easier construction than a combination of the 405 Freeway and Hawthorne Boulevard, which would be the alternative.

This line is one of the original LA County Proposition A rail corridors, and is one of eight

MAP 1



candidate corridors in the LACTC 30-Year Plan, as part of the Expanded Plan.

o South Bay to Long Beach corridor. Proposition A also called for an east-west rail line at the south end of the county; this is included in the LACTC 30-Year Plan as part of the Unconstrained Plan. Assuming a line which originates at the Del Amo Fashion Plaza, and follows Sepulveda Blvd. to Harbor Gateway, the ATSF Harbor Subdivision would provide an inexpensive right-of-way alternative for the segment serving Harbor City, the County unincorporated area thence to the Harbor Freeway, Carson, and northern Wilmington. (A combination of R/W along the west side of Watson Yard, and old PE R/W along the north side of Anaheim Street could provide access to downtown Wilmington and Long Beach.)

Use of the ATSF line could allow considerably cheaper construction using surface railroad R/W than would construction on aerial structure along the parallel segment of Sepulveda east of Torrance, or following some other street. It has also been suggested that this corridor could be extended into Orange County via the Long Beach CBD or north Long Beach, and connecting with a 405 Freeway or Katella transit corridor for intercounty transit service.

o Old Town to Long Beach corridor alternative. A "short-cut" from the LAX/El Segundo employment center to Long Beach would be provided by using the ATSF Harbor Subdivision throughout, from Freeman Avenue to Wilmington, via downtown Torrance. This might be developed as an alternative to using the Sepulveda route east of Del Amo Fashion Plaza, or in addition to it (as an express line). Again, cheaper construction would be facilitated by the use of surface railroad R/W.

o Crenshaw Corridor. This is the Airport Southwest Corridor identified in an earlier SCAG report, and is included in the 30-Year Plan, as part of the Expanded Plan. It has strong local support from Senator Diane E. Watson's Transportation Task Force, and is currently the focus of the Crenshaw Corridor Study Interagency Task Force, coordinated by the LACTC.

The ATSF Harbor Subdivision is a key element in development of the Crenshaw Corridor as conceived at present. The Crenshaw Corridor will probably originate in downtown Los Angeles in the Blue Line tunnel, run south along Flower, west on Exposition, and south on Crenshaw Boulevard, past the Baldwin Hills-Crenshaw Plaza Mall. It would continue down Crenshaw to the Harbor Subdivision, and continue southwest along the railroad R/W into Inglewood.

The City of Inglewood prefers that one branch of the Crenshaw Corridor would remain on the Santa Fe R/W, serving downtown Inglewood and LAX. The other branch would probably use a combination of tunnel, aerial, and surface R/W along Prairie to serve the Daniel Freeman Hospital, The Forum, Hollywood Park, and new Inglewood and Hawthorne redevelopment areas.

Long-term options include a link from Mid City Center at Pico/San Vicente (on the Red Line), south along Crenshaw to become one or the other of these branches; and even a Leimert Blvd. surface/tunnel "short-cut" between Exposition and Crenshaw for more direct airport service is possible. It should be noted that all of these alternatives will rely in part on the Harbor Subdivision for the connection between the Crenshaw District and Inglewood. Development



of this corridor could be key to the "Rebuild LA" effort currently under way.

o A longer-term potential transit route could follow the northern part of the Harbor Subdivision all the way from LAX and Inglewood to the City of Vernon, serving the huge US Postal Service complex near Florence, Huntington Park, the Vernon industrial section, the Produce Market on the east side of downtown, etc. (assuming an Alameda Street CBD connection). Running mainly along the north side of Slauson Avenue, this might be operated initially as a single-track line, similar to the San Diego Trolley.

o The Harbor Subdivision R/W between Century Blvd. and La Cienega, near LAX could also be used in developing a 405 Freeway transit line (either LAX-Palmdale or LAX-Sylmar).

o Yet another, perhaps shorter-term potential use, which has been identified in the TERM SHEET AGREEMENT BETWEEN SANTA FE AND THE SOUTHERN CALIFORNIA COMMUTER AGENCIES is for commuter rail, either running the full length of the Harbor Subdivision from the Wilmington area, past El Segundo/LAX and thence to Vernon, to end at LAUPT in downtown Los Angeles; or perhaps as two separate commuter lines, one from Wilmington to LAX and the second from El Segundo to LAUPT. Commuter rail use of the R/W, using the current (or relocated) freight trackage on the Harbor Subdivision might supplement and complement light rail use of specific parts of the corridor, and perhaps precede LRT development on particular segments of the line.

1 Under the terms of the AGREEMENT, only two commuter trains per peak period can be operated over the Santa Fe tracks, until the "Harbor Shift Date" at which time the Santa Fe will move its overhead or through freights between downtown and the ports, to the Alameda Corridor. After the Harbor Shift Date, public agencies (the LACTC and SCRRA) operating commuter rail will take over dispatching of the Harbor Subdivision, which would be used for local freight only. The shift of control to public agencies, which will take place only after the Alameda Corridor becomes a fact, will greatly facilitate public transit use of the Santa Fe R/W.

Numerous light rail transit uses have been identified above. These uses will not commence prior to the Harbor Shift Date, without the consent of the Santa Fe. While agreements may be reached to establish some of the facilities listed here on the Harbor Subdivision before the shift to the Alameda Corridor, the Santa Fe may very well want to maintain its option to double track parts of the line to allow expanded freight capacity, as a safeguard in the event that the Alameda Corridor does not come about. This could severely restrict the space that would be made available for light rail trackage, requiring more expensive aerial construction (or at least a stacked construction--one track on the surface, one aerial) along much of the line.

With regard to commuter rail, dispatching of such passenger trains on the Harbor Subdivision will be taken over by public agencies only after the Harbor Shift Date. This means that prior to the shift to the Alameda Corridor, the Santa Fe's Expedited Trains will have equal priority with commuter trains. If there is a considerable expansion in such port-related freight traffic, this could result in substantial commuter delay on the existing single track line. Hence, implementation of the consolidated rail corridor will be essential to establishment of reliable

commute service on the ATSF tracks. Even if commuter rail is only used as a "starter service" in anticipation of future light rail, the service should be reliable.

Similarly, while it is provided that more than two commuter trains might be operated, this would be only by mutual agreement between the ATSF and public agencies, and without implementation of the consolidated rail corridor, the Santa Fe might very well not agree to addition of more commuter trains.

The purchase AGREEMENT specifies that if the ATSF has not moved its port-related freight traffic to the Alameda Corridor within 10 years, the county transportation agencies can demand that the ATSF repurchase the Harbor Subdivision. Hence, there is a real danger that if the Alameda Corridor is not constructed and made operational, very few of the potential transit benefits from acquisition of the ATSF line, as discussed above, will come about.

1 On the other hand, the AGREEMENT notes that once the ATSF shifts its overhead rail freight service from the Harbor Subdivision to another route (the Alameda Corridor), there is a possibility that the railroad will petition the ICC to abandon segments of the Harbor line. This will very definitely expedite development of light rail on the Harbor Subdivision.

The Alameda Corridor will also allow a major diversion of Union Pacific through freights from the UP San Pedro Branch to the consolidated route. While the UP has considerable local freight on its San Pedro line, diversion of through traffic could free up track time and track space on this branch line. It is possible that in the future, some limited commuter rail service might be instituted on the UP line, serving communities such as South Gate, Paramount, Lakewood, and north Long Beach. An extension southward along the Lakewood Branch to the North Long Beach employment area could be possible. Commuter service, should such develop on the UP line, might be restricted to several round trips per day during peak periods, as has been suggested for the ATSF Harbor Subdivision.

#### Transit Benefits Not Permitted Under Alternative 2.2:

2 Alternative 1.0 (surface construction of the Alameda Corridor) and depressed trainway Alternatives 2.1A and 2.1S would provide additional major benefits which will not be allowed under Alternative 2.2 (trenched construction with the Vernon Diversion). This relates to the potential for public acquisition of the SP Wilmington Branch, along which the Blue Line currently operates, to permit both express service and capacity expansion for the light rail line. This is because Alternative 2.2 would require the use of the SP Wilmington Branch right-of-way north of Randolph Street/Slauson Avenue, to route the Consolidated Rail Corridor.

The SP Wilmington Branch, which parallels the Alameda Corridor, is at present the preferred Southern Pacific route between downtown rail yards and the ports. However, once the Alameda Corridor is in operation, it should make the Wilmington Branch available for uses other than port-related freight traffic. There is relatively little local freight service on this branch line; what will remain after diversion of port traffic to the Alameda Corridor could easily be handled by a few short trains, operating at night and perhaps during mid-day periods.

The following are potentially major transit uses for the Wilmington Branch (see also Map 2):

o There is reason to believe that the Blue Line, which currently carries 35,000 riders per day using local train service on two tracks, will need to add express service to function efficiently in future decades. The LACTC has investigated options for improving the capacity and speed of operation on this light rail corridor, and concluded that a skip-stop service using the existing double track line would not provide an adequate level of service. The LACTC study found that it would be necessary to acquire additional right-of-way, and operate one or two (preferably two) express tracks, to allow express service.

This can most easily be done by purchasing the remainder of the Wilmington Branch, along which the Blue Line operates. Historically, when this railroad corridor was part of the Pacific Electric system, there was a four-track operation south to Watts Junction, with the express trains on the inner two tracks and locals on the outer tracks.

Future Blue Line service however may very well leave the local tracks on one side of the right-of-way (current Blue Line tracks) and operate the express trains on the other side of the R/W. (where the freight tracks are currently located; also facilitating local freight service at night). South to Watts (the Green Line intercept), it is probable that bi-directional express service would be needed, requiring two tracks (south of this point, a single, reversible track may suffice). There appears to be room for two express tracks along most of the Wilmington Branch (except that only a single express track may be allowed at the extreme north end of the line between 25th Street and Washington Boulevard).

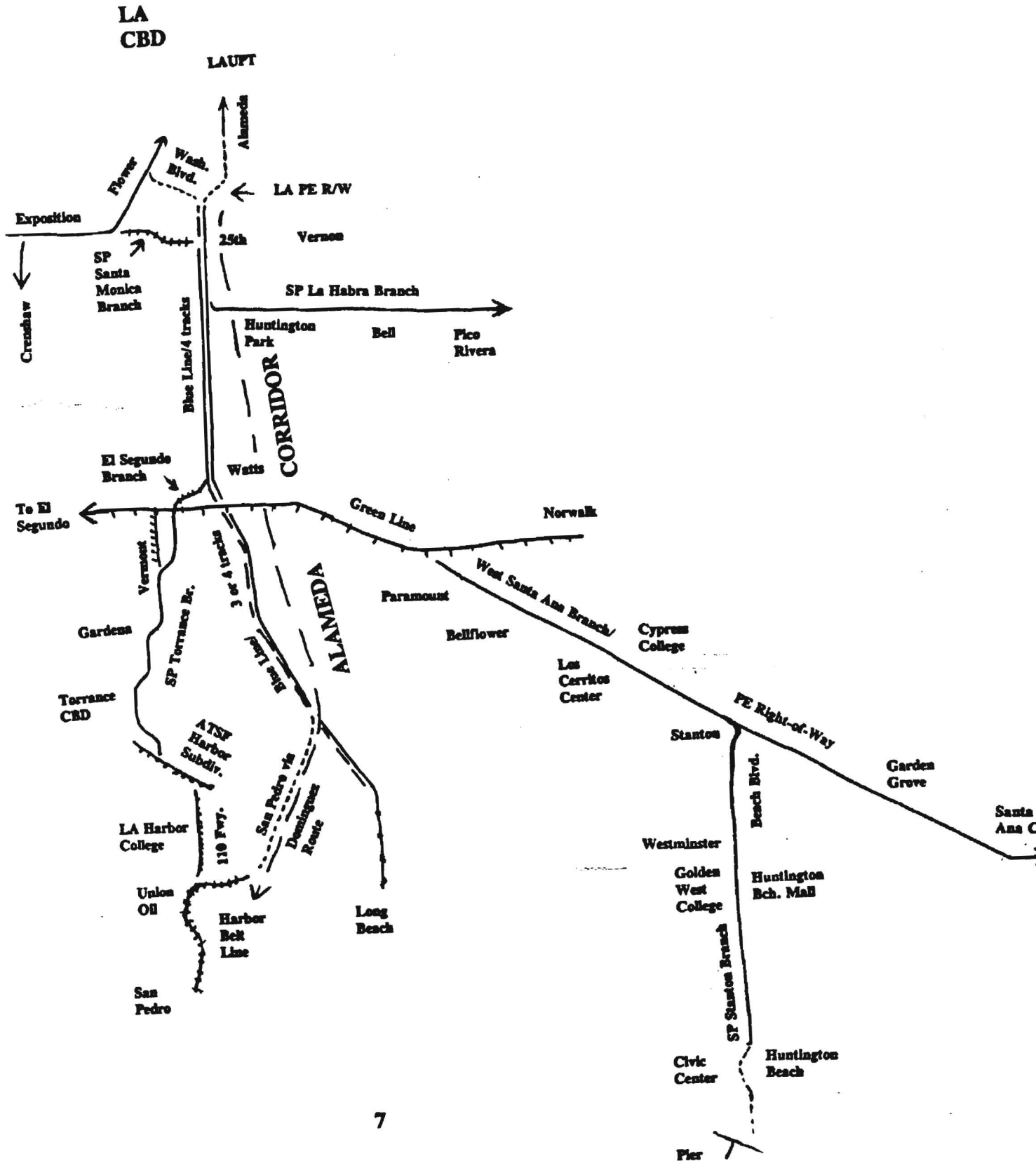
2

The segment of Wilmington Branch R/W required for port service under consolidation Alternative 2.2--from 25th Street south to Randolph Street (SP La Habra Branch), falls within the section of the line where four tracks will be needed for light rail. The use of this R/W for through freight trains to the harbor would preclude light rail express service along this section of the Wilmington Branch.

Other parts of the SCAG region, including the San Fernando Valley, Glendale, the San Gabriel Valley, and northern/central Orange County, will in the future have both a long distance express transit service, provided by the Metrolink commuter trains, and a moderate-distance local urban rail service using light rail, rapid transit, or monorails. The LA-Long Beach corridor is long enough (over 20 miles) to warrant express trains--in this case using the urban rail mode--as well as locals making all stops. The only way to provide the equivalent of Metrolink service on the Long Beach corridor, is to provide express trains on the Blue Line.

o Orange County has recently acquired the West Santa Ana Branch or PE right-of-way, a major diagonal right-of-way which stretches from Santa Ana in the southeast to Cypress/La Palma in the northwest. Here it connects with another segment of the line, recently purchased by the LACTC, which extends from Cerritos to Lynwood. The Green Line (in the Century Freeway median) is currently under construction between Lynwood and Watts, on part of the same R/W. In the future, it should be possible to implement a direct transit service from Santa Ana to downtown Los Angeles, via the West Santa Ana Branch, the Green Line, and the Blue Line.

MAP 2



West Santa Ana line boardings of as high as 40,000 riders per day have been forecast in the recent Orange County Rail Study, just for the segment from Santa Ana to the Norwalk area. Ridership could be even higher if through trains are operated through to Los Angeles, utilizing express track on the Blue Line corridor.

o Additional Orange County urban rail routes may be possible that would combine the PE right-of-way with other railroad rights-of-way, and which could similarly be connected with downtown Los Angeles via Blue Line express track, developed on the northern half of the Wilmington Branch. For instance, a line might be operated from Huntington Beach and Westminster north to Stanton (SP Stanton Branch) and thence northwest via the PE right-of-way to the Green Line, using Blue Line express trackage to access the LA CBD. This would provide access to the Huntington Beach Pier area and Civic Center, the Huntington Beach Mall, Golden West College, Cypress College, Los Cerritos Center, and numerous other activity centers.

2 While no patronage forecasts have been conducted on this potential route, more total trips to downtown LA are projected to originate in Huntington Beach than in certain major Metrolink origin points such as Riverside or San Bernardino, suggesting that an express service could be viable. In the year 2010, there are expected to be over 35,000 daily trips (including auto, carpool, etc.) between the RSAs which include Huntington Beach and communities to the northwest along the PE R/W, and downtown LA, Glendale, Burbank, and Pasadena, the Wilshire District, etc. (areas which will be eventually connected to the LA CBD by light rail and rapid transit lines). While only some of these trips would use an Orange County-LA transit line, this could add considerably to the demand for Blue Line express trackage on the Wilmington Branch.

(It should be noted that if several additional light rail lines were routed through the Flower Street subway in downtown LA, some of the express services using the Blue Line/Wilmington Branch R/W might need to access the LA CBD via the east side; right-of-way appears to be available here, including the former PE line above Washington Boulevard and Alameda Street, which would be suitable for an aerial line. This would provide access to Little Tokyo and LAUPT, where connections could be made to the Blue Line and Red Line tunnel routes. The LACTC has recently suggested an Alameda Street route in conjunction with a proposed Olympic Boulevard light rail line, and a non-revenue/revenue single track surface connection between the Long Beach Line and the Pasadena light rail line at LAUPT had previously been suggested for maintenance reasons. Hence, the use of the Wilmington Branch for express service need not be limited by a capacity limitation in the Blue Line tunnel.)

o There is also long-range, future potential to acquire the SP La Habra Branch for light rail service to Huntington Park, Bell, Maywood, Bell Gardens, and Pico Rivera--and perhaps farther east. This would operate into Los Angeles over the segment of the Wilmington Branch in question, from Huntington Park north. Such a service might operate on either express or local Blue Line trackage (in the latter case, other trains would be displaced to the express line).

Once through SP freights to the ports are diverted to the San Pedro Branch, which at least under a depressed trainway scenario would not connect with the La Habra Branch, there would be little reason to use the latter for port service. It is likely to become available for transit use,

therefore, at the same time as the Wilmington Branch.

o There may also be potential, in the more distant future, for a Torrance LRT line, following parts of the Vermont Avenue Median and the SP Torrance Branch, and serving Gardena, the Harbor Gateway area, and downtown Torrance--perhaps continuing south along the ATSF Harbor District, 110 Freeway, and Harbor Belt Line to San Pedro. A San Pedro via Dominguez light rail branch of the Blue Line, using Harbor Belt Line and the southern end of the Alameda Corridor, has also been suggested.

2

Projects such as this, however, would presuppose that the Harbor Busway will someday operate near capacity (i.e., including carpools and vanpools); the Torrance line might be feasible if there were interest in significant joint development projects along the rights-of-way in the primary service area. Any such rail transit projects would require additional capacity on the Blue Line, and would almost certainly have to operate over Blue Line express trackage, north of Watts, and would need to access the LA CBD via an east side (perhaps Alameda Street) alignment to LAUPT. (This could also provide a bypass route to Glendale or Pasadena.)

o Finally, it should be noted that the LACTC has acquired the segment of the SP Santa Monica Branch linking USC with the Blue Line at 25th Street. This may someday be used to provide a Blue Line service that bypasses downtown Los Angeles, running, for example, from Long Beach to Santa Monica via USC (Exposition Line). Again, this would require additional capacity on the Blue Line between Watts and 25th Street.

Considering the number of potential transit uses for this northern segment of Wilmington Branch right-of-way, it should be reserved for future Blue Line expansion, and not incorporated into the Consolidated Rail Corridor project.

Additional Difficulties With Alternative 2.2:

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Although an adequate speed has been allowed for in layout of the curvature at the north end of the Alameda Corridor under Alternative 2.2, the railroads, who have not been enthused with the idea of operating in a depressed trainway in any case, are likely to be even less happy with the additional S-curve that this alternative would entail. There is a possibility of increased derailments on curves, and the slight increase in track mileage will increase locomotive fuel consumption and must result in a slight increase in emissions per train. Further, the additional blind curves in the trenched part of the corridor may increase the danger to train crews in the event heavy objects are dropped onto the trackway by vandals in these locations.

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Conclusions

My conclusions are as follows:

First, the Alameda Corridor build alternatives (1.0, 2.1A, 2.1s, and 2.2), will produce major public benefits by freeing up certain rights-of-way--primarily the Santa Fe Harbor Subdivision, for public transit use. Feasibility would be improved, and costs reduced, for at least four

currently-planned urban rail projects, (including the Crenshaw Corridor project which has major implications for the Rebuild LA effort), and a fifth potential project will also be made possible. In addition, the Alameda Corridor would facilitate commuter rail development, either in the short term or in the long term, for the Santa Fe line.

Second, Alternatives 1.0, 2.1A, and 2.1S are superior to Alternative 2.2 from the viewpoint of transit potential, primarily because by using the SP San Pedro Branch, they would leave the northern end of the Wilmington Branch free for future transit development. This would enhance future Blue Line capacity and make express service possible. Specifically, this would permit Long Beach as well as Orange County express service, make it possible to add one or more Blue Line branches within LA County, and permit through-routing of Long Beach Trains to the Exposition line.

Third, Alternative 2.2 appears to be inferior to the alternatives which would construct the consolidated rail corridor in trenched configuration entirely along Alameda Street, for reasons of railroad operating efficiency and safety, and probably also air quality.

If there are any questions concerning the contents of this letter, please do not hesitate to contact me.

Sincerely,



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