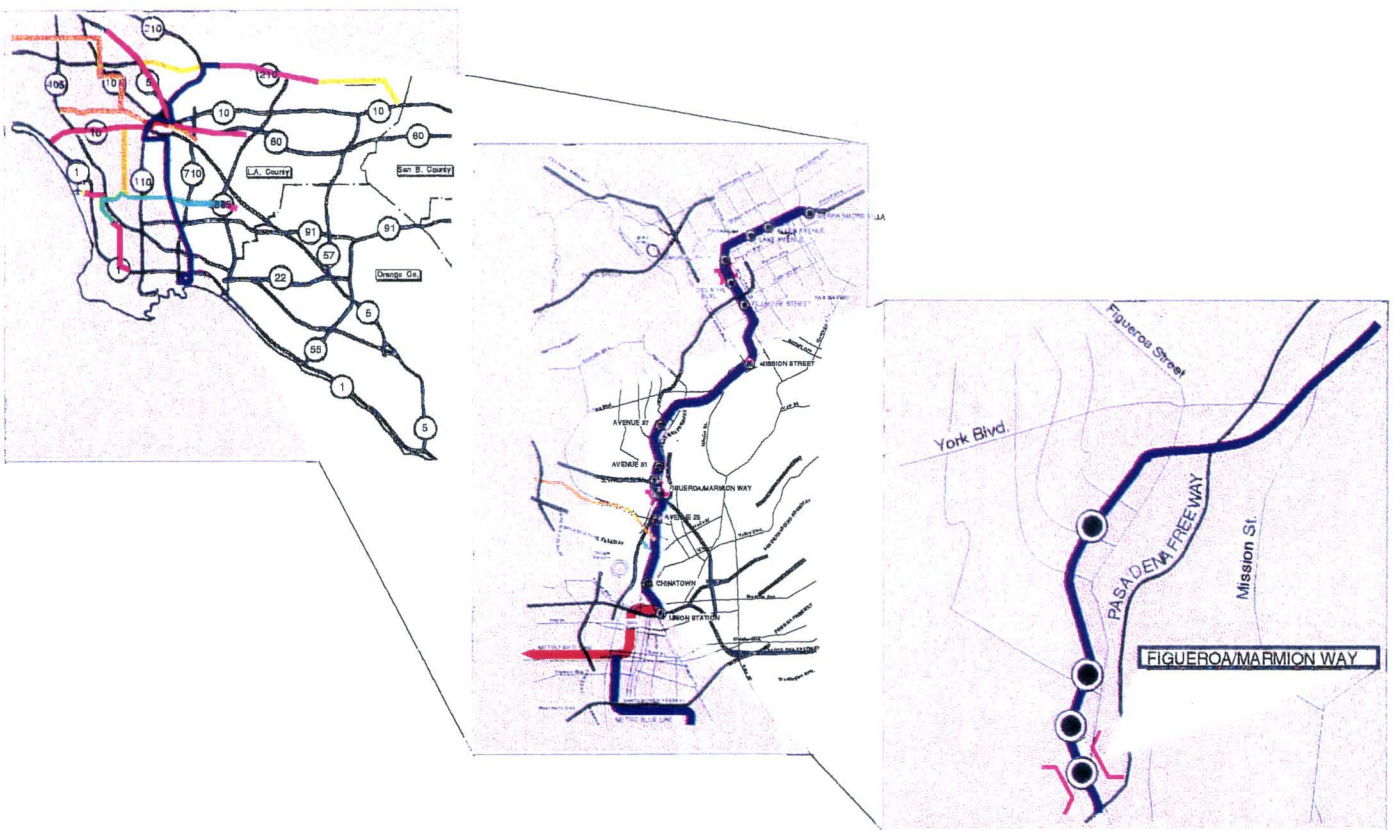


LACMTA/RCC



Final Supplemental Environmental Impact Report Pasadena-Los Angeles Light Rail Transit Project



Contract ENO-26
CWO No. -002
May 1994

Prepared By:



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SECTION 1.0 INTRODUCTION

1.1 CONTENTS OF FINAL SUPPLEMENTAL ENVIRONMENTAL IMPACT REPORT

This Final Supplemental Environmental Impact Report (FSEIR) for the Pasadena-Los Angeles Light Rail Transit (LRT) Project presents the comments received during the public circulation period for the Draft Supplemental Environmental Impact Report (DSEIR) and the Los Angeles County Metropolitan Transportation Authority's (LACMTA) responses to those comments. Also included in this FSEIR are any corrections or additions to the contents of the DSEIR necessitated by public and agency comments, and/or by project refinements. The comments, responses to the comments, and additions and corrections are included in Section 2 of this FSEIR.

Section 3 includes copies of the written comments as received by the LACMTA, and copies of the transcripts of the two public meetings held on April 13 and 20, 1994, at the Franklin High School Auditorium in Highland Park and the Pasadena Hastings Branch Library in Pasadena, respectively.

The DSEIR is incorporated herein by reference as part of this FSEIR. For further information on this FSEIR or to obtain a copy of the DSEIR, contact:

Harley S. Martin, Environmental Specialist
Los Angeles County Metropolitan Transportation Authority
818 West Seventh Street
Los Angeles, California 90017
(213) 244-6848

1.2 PROJECT SUMMARY

This SEIR for the proposed Pasadena - Los Angeles LRT Project analyzes the potential environmental effects that may result from the approval of a second set of planning and design modifications to the project as specified in the antecedent EIR [State Clearinghouse Nos. 88042713 (Revised Draft, LACTC, 1989) and 89082327 (Final, LACTC, 1990)] and first SEIR (State Clearinghouse No. 92071005, LACTC, 1992).

The LACTC expects to accomplish the following objectives through this transit project:

- To provide the citizens in the Pasadena-Los Angeles Corridor with a safe and efficient light rail transit system;
- To alleviate overcrowding and traffic congestion on local freeways that presently serve the region extending from Pasadena/West San Gabriel Valley to downtown Los Angeles;
- To improve transportation mobility in the Pasadena-Los Angeles Corridor;

- To connect Pasadena and the San Gabriel Valley with the regional transportation network consisting of Metro Rail, light rail, and busway facilities;
- To improve regional air quality through the reduction of vehicle trips and roadway congestion; and
- To construct this project and the other projects as expeditiously and cost-effectively as possible.

The location of the proposed project is along the existing railroad right-of-way between Union Station in Los Angeles and the intersection of Sierra Madre Villa Avenue and the Foothill (210) Freeway in Pasadena [see Figures 2.1-1 and 2.1-2 in DSEIR (LACMTA, 1994b.)] The proposed action consists of issues affecting the LRT alignment in the following five areas: (1) along Marmion Way in Mount Washington; (2) in the vicinity of Marmion Way and Figueroa Street in Highland Park; (3) in the vicinity of Arroyo Seco Park in Highland Park; (4) in South Pasadena; and (5) in the vicinity of Sierra Madre Villa in east Pasadena.

The types of planning and design modifications proposed include the following improvements:

- (a) a change from street-running to semi-exclusive train operation along Marmion Way in Mount Washington and Highland Park;
- (b) additional street closures in Highland Park;
- (c) additional property acquisition to provide adequate emergency vehicle access to streets along Marmion Way between Avenues 51 and 59;
- (d) additional property acquisition (three parcels in Arroyo Seco Park) to provide temporary easements for Arroyo Seco Bridge renovation activities;
- (e) additional property acquisition (one parcel in Elysian Park) for construction of an access road between the LADWP Buena Vista Pump Station and Midway Yard [formerly an Atchison, Topeka and Santa Fe (AT&SF) switchyard];
- (f) sound barrier wall modifications along Marmion Way in Mount Washington and Highland Park, and in South Pasadena;
- (g) a below-grade separation option in the vicinity of Marmion Way and Figueroa Street in Mount Washington, including closure of French Avenue; and
- (h) a change in alternative locations for a Park and Ride facility located at Madre Street/Sierra Madre Villa and the Foothill Freeway in east Pasadena, including two additional parcel acquisitions for the Johnson & Johnson/Merck alternative.

1.2.1 Environmental Effects And Mitigation Measures

This SEIR focuses on the following environmental resources/issues: earth resources, air quality, water resources (groundwater), noise and vibration, risk of upset, housing, transportation/circulation, public services, human health, and cultural resources.

A complete environmental impact analysis, including environmental setting, environmental impacts, mitigation measures, and significance of impacts after mitigation for each CEQA topic is provided in Section 4.0 of the DSEIR (LACMTA, 1994b), incorporated herein by reference.

The results of the various investigations indicate that the environmental issues resulting in potentially significant impacts that require mitigation are noise and vibration, transportation/circulation, and cultural resources.

1.2.2 Cumulative Impacts

Under CEQA [PRC, 21083 (b)], the Pasadena - Los Angeles Rail Transit Project EIR (LACTC, 1990) concluded that it would have a significant effect on the environment if, "possible effects of a project are individually limited but cumulatively considerable...when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects."

Under CEQA Guidelines (CAA, Section 15130), the project EIR considered the following four factors: (a) definition of relevant area affected; (b) consideration of all sources of related impacts; (c) quantification of cumulative impacts, where appropriate; and (d) focused evaluation of significant impacts. The analysis was performed and subsequently accepted as part of the EIR Certification process. This was also the case for the first set of planning and design modifications studied in the antecedent SEIR.

The second set of planning and design modifications evaluated in this SEIR does not alter any of the previously conducted analyses or change their respective findings regarding cumulative impacts. The planning and design modifications proposed in the second SEIR in and of themselves are not affected by any past projects, other current projects, or known probable future projects. Nevertheless, the project as described in this SEIR and prior CEQA documentation is designed such that there will be an opportunity to establish an interface with Metrolink as part of its proposed Northern San Gabriel-San Bernardino Valley (NSG-SBV) Rail Transit Corridor Project. The proposed NSG-SBV Rail Transit Corridor Project would be located within the AT&SF Pasadena Subdivision right-of-way from the terminus of the LRT alignment at Sierra Madre Villa Avenue in Pasadena to Montclair's Transcenter in San Bernardino County. This proposed rail transit project forms a part of the larger regional transit system that would link major activity centers within these cities with Metro Rail service in downtown Los Angeles and points beyond.

1.2.3 Identified Areas Of Controversy And Issues To Be Resolved

The subject second set of planning and design modifications evaluated in this SEIR present no areas of controversy and/or issues to be resolved.

SECTION 2.0 RESPONSES TO COMMENTS

2.1 INTRODUCTION

Section 2 presents a record of the substantive comments received on the DSEIR. Both written comments received during circulation of the document and oral testimony provided at the public meetings have been included. The public review period for the DSEIR commenced on March 25, 1994 and ended on May 9, 1994. Public hearings were held at the Franklin High School Auditorium in Highland Park, the City of Los Angeles (820 N. Avenue 54) on April 13, 1994, and the Pasadena Hastings Branch Library in Pasadena, the County of Los Angeles (3325 E. Orange Grove Boulevard) on April 20, 1994.

During the course of the public review period, 15 comment letters were received: 5 from public agencies; 15 from business; 4 from private organizations; and 1 from an individual representing the private sector. Two letters were received from the City of Los Angeles Bureau of Engineering, and six letters/memoranda were received from the City of Pasadena. They were counted as one submittal each. Some of the letters received raised a single issue and others contained multiple comments or questions. All of the letters submitted supported the LRT Project, but comments addressed potential project impacts and proposed mitigation measures.

At the two public meetings, 10 speakers testified before the hearing officer, an LACMTA official. Some of the speakers duplicated comments which were expressed previously or were also submitted in written form. All speakers expressed support for the project.

All written and oral comments have been organized by comment letter and by public hearing date. The comments are presented below with an appropriate response for each. Comments were edited to eliminate unnecessary text and for clarification of the contents. Consequently, they may not represent complete quotations from the comment letters or testimony provided during the public review period. The editing was done solely for the purpose of reducing unnecessary text, with no intent of obscuring any comment or testimony received. Copies of the written comments submitted during the public review/comment period and the testimony received at the public meetings are included in Section 3.

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2.2 COMMENTS AND RESPONSES

2.2.1 Oral Comments Presented at Public Hearings

2.2.1.1 Public Hearing Held April 13, 1994

Comment 2.2.1.1-1:

"I request that a concept wall site plan of the grade separation at Marmion and Figueroa be included in the Supplemental Environmental Impact Report prior to its certification." (David Kuehn, Los Angeles, Public Hearing 4/13/94)

Response 2.2.1.1-1:

See Figure 2-1 in Section 2.3.

Comment 2.2.1.1-2:

"Instead [of] an underpass at Figueroa Street/Marmion Way, there should be [an] aerial flyway which would free up additional money to speed up the construction of the Pasadena Blue Line." (Pat Moser, Southern California Transit Advocates, Public Hearing 4/13/94)

Response 2.2.1.1-2:

An above-grade separation at Marmion Way and Figueroa Street was analyzed in the first SEIR (LACTC, 1992.) In response to the adverse community reaction to unavoidable visual impacts from the above-grade separation, a below-grade separation was analyzed in the subject SEIR (LACMTA, 1994a.) The below-grade separation is the environmentally-preferred alternative. CEQA requires that environmental analyses be performed irrespective of fiscal impacts.

Comment 2.2.1.1-3:

"...when construction workers start on that underpass, where are they going to park? What time they going to start? What time they going to stop? Who is the contact person in case we got any complaints? And machinery, how much impact is that going to have on all that block in there?" (Victor Arredondo, Los Angeles, Public Hearing 4/13/94)

Response 2.2.1.1-3:

Worker parking will be provided along the existing railroad right-of-way, to the maximum extent possible, during construction of the below-grade separation. Section 2.8.9, Construction Noise and Vibration Control, of the LACMTA Systemwide Criteria is presented below in Section 2.3. The criteria include noise level limitations for both daytime and nighttime to ensure that noise levels within 200 feet of the construction limits and beyond will not exceed Federal, State and local limitations. Daytime is defined as from 7:00 AM to 7:00 PM. Construction starting and

stopping times will vary slightly from these times. Construction during the night would require written permission from the board of police commissioners as provided in the Los Angeles Code Section 41.40(b). The criteria also include measures to mitigate adverse noise impacts generated from construction machinery and vehicles. The contact person at LACMTA who is responsible for enforcing noise and other mitigation measures for the LRT Project is Mr. Harley Martin, Environmental Specialist, 818 West Seventh Street, Los Angeles, California 90017. Mr. Martin may be contacted at (213) 244-6848.

Comment 2.2.1.1-4:

"The new light rail apparently is going to take the alley or right of way next to six garages, and I will no longer have access to these garages or any way to provide parking for the six houses next to them...I believe that those garages will have to be torn down. You'll have to pave an area to provide off-street parking for these tenants...that 10 foot wide right-of-way is going to be almost like a loss of property to me for future building because I will not be able to use the corner or the side of the alley which will be blocked." (Robert Argott, Los Angeles, Public Hearing 4/13/94)

Response 2.2.1.1-4:

LACMTA has determined that the right-of-way of the subject property is owned by the LACMTA; tenants presently use LACMTA right-of-way to access the garages.

Comment 2.2.1.1-5:

"Regarding the parcel descriptions that are in the environmental impact report of Plots PA 248 and 249, there is a misrepresentation of the alley width. It's not 10 foot as proposed or expressed, and according to your own maps it's 15 foot, according to the Public Works maps." (Joanne Barker, Los Angeles, Public Hearing 4/13/94)

Response 2.2.1.1-5:

Comment noted; 15 feet is correct.

Comment 2.2.1.1-6:

"...could you please tell me why it's taken from 1988 until now to discuss the fire department accessibility or any public service accessibility?" (Joanne Barker, Los Angeles, Public Hearing 4/13/94)

Response 2.2.1.1-6:

When the project EIR (LACTC, 1990) was written, street running was the proposed light rail operational scenario. Under the street running scenario, LRT vehicles would have operated at the same speeds posted for other vehicular traffic operating on Marmion Way. LRT vehicles, cars,

and pedestrians would have been controlled by traffic signals where the right-of-way intersects local streets. Turning movement difficulties were not identified until prior to final design.

To increase public safety and for other operational benefits, semi-exclusive operation was proposed and was evaluated in the subject SEIR (LACMTA, 1994a.) Semi-exclusive running includes train speeds greater than for street running (up to 35 miles per hour) and would require street closures (also addressed in the SEIR). Closure of the streets and full use of the right-of-way made it impossible for emergency vehicles to negotiate the turns along the connector roads between each pair of closed streets. Emergency vehicles would presently encroach onto the railroad right-of-way to negotiate turns. Therefore, curb cuts and property acquisitions are required to widen the connector roads for emergency vehicle access.

Comment 2.2.1.1-7:

"...we constantly talk about relocation of residents and the demolition of structures, and some of the structures are not historic and some...are historic, but what I would rather hear them say is a relocation of residents and a relocation of historic structures...Of particular interest to us is 5323, a brown bungalow structure which I'm trying to relocate in Echo Haze area if possible. And several houses that were taken in the initial EIR, which aren't addressed under the SEIR I think at 5030 Marmion and 130 and 144 Avenue 51 should be looked at for relocation. And we would work with the counsel offices and with MTA to find appropriate locations for those relocations...I must -- we must take exception to the taking of 5318 and 5 -- 5518 and 5520 Marmion Way, two very historic homes, to make way for what you say the fire department needs for a major U-turn ability. I wish we could find some other ways to mitigate that by finding out whether the fire department could take other avenues rather than destroying those two homes...I understand that some of the homeowners that were supposedly contacted and accepted and were interested in it actually were not contacted and are not interested in being bought out and relocated.." (Robert Evinger, Highland Park Heritage Trust, Public Hearing 4/13/94)

Response 2.2.1.1-7:

LACMTA would be willing to consider participation, up to the cost of building demolition, in the relocation of historically-significant buildings to appropriate locations determined by the Highland Park Heritage Trust.

The curb cuts and property takes addressed in the SEIR (LACMTA, 1994a) were determined to be the alternative providing the most efficient and safest emergency vehicle access to streets that are proposed for closure. However, LACMTA would be willing to discuss any other alternatives proposed by the Highland Park Heritage Trust and/or the Los Angeles Fire Department. The LACMTA will evaluate alternatives to taking the two homes (5518 and 5520 Marmion Way).

LACMTA has notified all owners of properties that would be affected by the modifications to the LRT Project as addressed in the SEIR (LACMTA, 1994a.)

Comment 2.2.1.1-8:

"We do have questions again regarding some of the takings and of course the relocation. Mr. Evinger spoke about this, and so did Miss Barker over at 5518. Those two in particular we are very concerned about because they are both historic homes...The other -- there is a third alley that goes through that block and bisects it. Our feeling is that there is plenty of access to that particular block, and that block has much more access than most blocks do in the Highland Park area. We don't feel that the taking of these two houses is anywhere necessary...The other ones in particular I just want to remind the MTA about the Avenue 61 power substation, that we are asking that the possibility of relocating that station to beside a portion of Avenue 61, the industrial property that is located next door...this property has been vacated by almost three years now and deteriorating." (Charlie Fisher, Chairman, Highland Park Neighborhood Association, Public Hearing 4/13/94)

Response 2.2.1.1-8:

Please refer to Response 2.2.3-4, above. The Avenue 61 power substation has been addressed in previous CEQA documentation for the project (LACTC, 1990 and 1992.) However, your reminder has been noted.

Comment 2.2.1.1-9:

"...one, to my surprise, I ordered the EIR report, and I did notice our address up there, which is the first I've ever seen...I've never been notified of anything or any interest to our property. Secondary, I'm opposing the closure of Avenue 53. My main concern is the crime problem on Avenue 53 and Monte Vista...I don't see where it would speed up the train any more by maybe a fraction of a second or so I can't imagine." (Rose Xochiaua, Los Angeles, Public Hearing 4/13/94)

Response 2.2.1.1-9:

LACMTA has notified all owners of properties that would be affected by the modifications to the LRT Project as addressed in the SEIR (LACMTA, 1994a.)

When Avenue 53 is closed, alternate access will still be readily available from adjacent local residential streets, and no arterial or secondary streets will be closed as a result of the proposed project. The affect of the closure of Avenue 53 on crime in the vicinity of Monte Vista should not be significant.

Please see DSEIR Section 4.8, Public Services and Safety (LACMTA, 1994b) for further information regarding security, police service, and public safety.

Comment 2.2.1.1-10:

"There will be skirts on the trains...When you build the sound walls, they do not have to cover the trains. They can go all the way up to the windows so there's no need for you to use sound walls...In addition,...each car will have digital horns which will mitigate the loud noise as the train approaches a grade crossing." (Pat Moser, Southern California Transit Advocates, Public Hearing 4/13/94)

Response 2.2.1.1-10:

LACMTA's noise analysis in the SEIR (LACMTA, 1994a) indicates the need for sound barrier walls to mitigate adverse impacts. However, the analysis indicates that, in some places, the walls need not be as high as proposed in the FEIR and first SEIR (LACTC, 1990 and 1992, respectively.) Please see DSEIR Section 4.4.5.1 for a discussions of sound barrier walls (LACMTA, 1994b.)

The use of audible warning devices on LRT vehicles is addressed in DSEIR Section 4.4.5.1 (LACMTA, 1994b.)

Comment 2.2.1.1-11:

"There will be no adverse impacts on bus service." (Pat Moser, Southern California Transit Advocates, Public Hearing 4/13/94)

Response 2.2.1.1-11:

Comment noted.

2.2.1.2 Public Hearing Held April 20, 1994

Comment 2.2.1.2-1:

"...we feel that we want to be on record that this supplemental only expresses one view, and that's of the traffic patterns if the light rail and when the light rail goes in. It does not express traffic patterns of the PCC Skill Center or what's going to be developed on the property; therefore, we feel even though officially it's a correct document, unofficially it's flawed because we still have other documents to take into consideration." (Timothy Price, Daisyville Home Owners Association, Public Hearing 4/20/94)

Response 2.2.1.2-1:

The EIR for the proposed LRT Project, including a Park and Ride station in east Pasadena near the Foothill (210) Freeway and Sierra Madre Villa Avenue, was approved in 1990. The transportation/circulation analysis in this FSEIR (including the DSEIR incorporated by reference) pertains to alternate locations for the previously-approved Park and Ride facility. Potential

cumulative transportation/circulation impacts resulting from the addition of the Pasadena City College (PCC) Skill Center should be addressed in the CEQA documents prepared for that project.

Comment 2.2.1.2-2:

"...these traffic reports indicate...that we were going to have significant traffic impacts at four major locations in our east end of Pasadena...Level "F" mitigated is not acceptable... "E" is bad enough when you get occasional delays, but "F" is grid lock, and I think something has to be done further in the way of mitigation to look at what alternatives can be made in order to alleviate that traffic problem.

"You looked at [CO] emissions, and...by your own standards there are times when you are you barely, barely within the maximum acceptable level of [CO] emissions in an eight-hour period, 8.8 parts per million, when the maximum is 9...I would almost challenge you to give us the detailed analysis of how that was calculated because I could think that you could slip over the other side of 9 just as easily as you could slip under 9 knowing what the level is.

"I acquired a copy, albeit it was done by I guess some staff engineer, that gave proposed layout for the Johnson & Johnson site. Here it is. It says the construction of the Park and Ride facility would be constructed at the proposed Johnson and Johnson work site or at the alternate Builder's Emporium site. At either site, proposed three story structure would be constructed with two and a half levels for the parking of a few cars and a half level of grade for bus loading, unloading and layover. This drawing -- and it's undated -- proposed a thousand car park encompassing everything from Sierra Madre Villa to Halstead, taking away a property that does not belong to Johnson & Johnson...all through the discussions of this development of the Sierra Madre terminal ... we talked about having multiple story park facilities provided that would also then provide room for businesses to be developed that would be compatible to the type of business that you would associate with egress and so forth from a station. If you cover the whole darn thing with parking lot, that won't leave any room to do that." (Ciff Benedict, Public Hearing 4/20/94)

Response 2.2.1.2-2:

The determination of significant impacts to transportation/circulation and the effectiveness of mitigation measures can be expressed in a simplified manner as a two-step process:

1. To determine project impacts, levels of service (LoS) for impacted intersections prior to mitigations (unmitigated LoS) are compared to traffic volumes projected to the year 2010 that include growth in ambient traffic plus traffic from other developments (cumulative LoS); then
2. To determine the effectiveness of mitigation measures proposed for the project, LoS' calculated assuming traffic reductions from implementation of mitigation measures (mitigated LoS) are compared to cumulative LoS values.

Using this procedure as required by CEQA, no significantly impacted intersection was increased to LoS "E" or "F" after allowing for proposed mitigations. Comparing cumulative LoS to mitigated LoS, two intersections would remain at level "E," one would remain at level "F," and two would be reduced from level "F" to "E" as a result of the mitigation measures proposed in the DSEIR [see Table 4.7-3 (LACMTA, 1994b)]. Those intersections projected to be at LoS "E" or "F" were the result of ambient and cumulative traffic projections and were not exacerbated by project-related traffic. Therefore, according to CEQA Guidelines, no significant impacts would occur as a result of mitigated project-generated traffic.

The CO emission rate of 8.8 ppm was a conservative calculation based on a worst-case scenario. The actual CO emission rate for the Sierra Madre Villa Park and Ride Facility is expected to be less than 8.8 ppm, in spite of variability in anticipated traffic. Therefore, it is unlikely that the 9.0 ppm would be exceeded. Air emission calculations have been included in Section 2.3, below.

The revised drawing for the Johnson & Johnson/Merck Park and Ride facility is presented in Figure 2-2 in Section 2.3, below. It is proposed to take all of the structures located between Foothill Boulevard to the north, the Foothill (210) Freeway to the south, Sierra Madre Villa Avenue to the west, and Halstead Street to the east, with the exception of the Southern California Edison Company substation on Sierra Madre Villa Avenue and the Foothill Freeway. Parking for 1,000 vehicles would be provided. The project includes an alternative to construct a three-level parking structure with compatible businesses if there is private sector interest to do so.

2.2.2 Comments Submitted in Writing

2.2.2.1 Letter 1 from Robert S. Horii, City of Los Angeles, Bureau of Engineering; May 9, 1994

Comment 2.2.2.1-1:

"The relocation of sanitary sewer at Marmion Way and Figueroa Street will have significant impacts on neighborhood traffic circulation, parking and private driveway access along the proposed route. This relocation route will include portions of Pasadena Avenue, French Avenue, Marmion Way, Loreto Street and Figuero Street (see attached plan). Due to the magnitude of these impacts, the Mitigation Measures of the original EIR are inadequate and need to be augmented in the SEIR."

Response 2.2.2.1-1:

The LACMTA is committed to provide mitigation measures recommended in the original EIR, the first SEIR, and this second SEIR. The LACMTA maintains that these measures are adequate to mitigate potential impacts to the city sewer system and local circulation. The "Worksite Traffic Control Plan," as required by the Los Angeles Department of Transportation (LADOT), will help mitigate potential impacts to local circulation, such as curb cuts, and parking that might be caused by project-related construction.

It should be noted that utility upgrades and relocations are common in the urbanized Los Angeles area, and the City of Los Angeles (City) has detailed procedures established for private developers and public agencies to construct such improvements with minimal impact to local businesses, residents, drivers, and pedestrians. All sewer relocations and traffic plans will be processed in accordance with local permit procedures, which will effectively mitigate potential impacts to local communities (See Table 1.1-1 in DSEIR).

Comment 2.2.2.1-2:

"The SEIR mitigation of impacts to Marmion Way between Avenues 50-58 are inadequate. Mitigation Measures should include all improvements shown on the 85% Submittal Drawings for the Arroyo Seco to Los Angeles River - C6420 Contract."

Response 2.2.2.1-2:

The LACMTA is committed to providing safe emergency and local access to the areas to be improved. However, the improvements referred to by the City and outlined in Contract C6420 are considered "betterments." The City is essentially requesting LACMTA to rebuild an historically substandard portion of Marmion Way. The LACMTA will meet fire and safety requirements with its planned street improvements, but the additional improvements requested by the City are not necessary nor required as a direct result or impact of the proposed project.

2.2.2.2 Letter 2 from Robert S. Horii, City of Los Angeles, Bureau of Engineering; May 9, 1994

Comment 2.2.2.2-1:

"The DSEIR did not include a discussion of the impacts associated with the relocation of 14-, 18-, and 24-inch city trunk sewers in conjunction with the Figueroa Street at Marmion Way grade separation."

Response 2.2.2.2-1:

These improvements were generally identified in Table 1.1-1. However, CEQA does not require a strict accounting of every planned utility relocation or improvement as long as their general impacts are identified. This is especially true of "standard" projects such as utilities that must be relocated or realigned as the result of new construction projects. Mitigation measures for utility relocation were adopted for the Final EIR, and no conditions have changed to warrant modification of the adopted measures.

Comment 2.2.2.2-2:

"The DSEIR should include an analysis of additional impacts on traffic and the surrounding areas that would be associated with street vacations and utility relocations."

Response 2.2.2.2-2:

Traffic impacts associated with utility relocations will be minimal and temporary. "Worksite Traffic Control Plans" will be prepared for each construction site to identify and alleviate specific circulation impacts. These plans will be reviewed and approved by LADOT. (Also see Table 1.1-1 in DSEIR.)

The long-term traffic changes that will occur as a result of the various proposed street closures (vacations) are outlined in the traffic analysis of the SEIR. None of the traffic impacts at any of these locations were considered to be significant after implementation of recommended mitigation measures.

Comment 2.2.2.2-3:

"Construction sites five or more acres in size require a stormwater permit if construction activities disturb soils."

Response 2.2.2.2-3:

The LACMTA is aware of the stormwater NPDES permit requirements and will, along with the appropriate contractor, apply for such permits if needed.

Comment 2.2.2.2-4:

"Plans for the Southwest Museum station and child care center should be coordinated."

Response 2.2.2.2-4:

The LACMTA is presently coordinating the plans for these two facilities, and coordination will continue until construction of the planned improvements are complete.

2.2.2.3 Letter from Nancy Key, City of Pasadena, Zoning and Subdivision Administration; May 9, 1994

Comment 2.2.2.31:

"Comments on this document are directed primarily towards the impacts of the proposed 1,000 car park and ride facility in East Pasadena at either the Johnson and Johnson site or the former Builder's Emporium.

"Since the project's impact on historical/cultural resources is a primary environmental impact affecting the City of Pasadena, as a preliminary to my comments portions of AB 2881 which became effective January 1, 1993 are quoted. AB 2881 addresses historical resources and the California Environmental Quality Act (CEQA). The 2nd Draft SEIR is inadequate because it does not consider alternatives at the Johnson and Johnson site to demolishing the structure.

"Section 5021.1 of the Public Resources Code

(j) 'Historical resource' includes, but is not limited to, any object, building, structure, site, area, place, record, or manuscript which is historically or archaeologically significant, or is significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, limitary, or cultural annals of California.

"Section 21084.1 of the Public Resources Code with emphasis added.

A project that may cause a substantial adverse change in the significance of an historical resource, is a project that may have a significant effect on the environment. For purposes of this section, an historic resource is a resource listed, in or determined to be eligible for listing in, the California register of Historic Resources, historical resources included in a local register of historical resources, as defined in subdivision (k) of Section 5020.1, or deemed significant pursuant [to] criteria set forth in (g) of Section 5024.1, are presumed to be historically or culturally significant for the purposes of this section, unless the preponderance of evidence demonstrates that the resource is not historically or culturally significant. The fact that the resource is not listed in or determined to be eligible for listing in, the California Register of Historic Resources, not included in the local register of historical resources, or not deemed significant pursuant to criteria set forth in subdivision (g) of Section 5042.1 shall not preclude a lead agency from determining whether the resource may be an historical resource for purposes of this section."

Response 2.2.2.3-1:

The LACMTA acknowledges the definitions of historical resources and recognizes the authority of the City of Pasadena under CEQA regarding cultural resource designation.

Comment 2.2.2.3-2:

"The project Description is inadequate as it does not describe the existing landscaping of the current site nor the layout, ingress, egress, and landscaping of the proposed park and ride facility at the Johnson and Johnson site. Further there is no discussion of a parking structure at the Builder's emporium site. This site is much smaller than the Johnson and Johnson site and probably could not accommodate 1,000 surface parking spaces. The project description does mention that the park and ride facility will be lighted at night but mentions no shielding of light to prevent spillover on adjacent properties. There is also no discussion of how commuters would get from their cars to the station."

Response 2.2.2.3-2:

The project description necessarily describes aspects of the proposed project. A description of the historical aspects of the Johnson & Johnson/Merck site are included in the Cultural Resources section in DSEIR Chapter 4, as required by CEQA. General project alternatives were addressed in the antecedent EIR. It should be noted that the Johnson & Johnson/Merck and Builders

Emporium alternative park and ride sites were included in this SEIR at the request of the City of Pasadena. It should be further noted that the project description does not exclude the consideration of parking structures on either of these two park and ride sites as potential alternatives.

As stated by the commentor, the Builder's Emporium site is smaller than the Johnson & Johnson/Merck site. However, the proposal for 1,000 parking spaces is a conservative maximum estimate, and could include some combination of surface or structured parking. In this regard, either site is adequate in size for this amount of parking.

The project description does not provide design details for parking structures on either site. However, the LACMTA has an extensive design review process that involves close cooperation with affected agencies. The City of Pasadena would necessarily be included in review of any proposed parking facilities or structures. The issues of landscaping and shielding for night lighting could be addressed at that time.

Comment 2.2.2.3-3:

"Impacts from using the Johnson and Johnson site for a park and ride facility include but may not be limited to air, water, plant life, light and glare, land use, transportation/circulation and cultural resources. Impacts from using the Builder's Emporium site would probably involve possible impacts from building a parking structure which could have shade/shadow impacts. Due to the inadequate project description it is not possible to fully analyze all project impacts on the environment."

Response 2.2.2.3-3:

As stated in the previous Response 2.2.2.3-2, design aspects of any parking structures on either of these sites would necessarily include coordination with the City of Pasadena. The LACMTA maintains that this SEIR adequately characterizes the potential impacts of the project, including development of either park and ride site. Shade and shadow effects were not considered significant due to the probable location and size of such structures on either site (i.e., neither would cast shadows onto sensitive uses beyond the property boundaries). However, these and similar architectural issues would be most appropriately addressed at the design review stage.

Comment 2.2.2.3-4:

"Air could be an impact if the existing structures and landscaping at the Johnson and Johnson site are removed and replaced with asphalt for 1,000 surface parking spaces. The absence of landscaping, the increased impermeable surface adsorbing and reflecting sunlight and heat will increase the temperature on the site."

Response 2.2.2.3-4:

The Final SEIR contains additional information on air quality impacts, including dust generation (see Section 2.3.6.1). The LACMTA will provide landscaping to meet local standards as part of site development (for either surface or structured parking). Given that the site was previously developed and that the entire area is already urbanized, the change in reflectivity from redeveloping either site is not considered significant. This conclusion is similar to those reached in other recent environmental documents processed through the City of Pasadena.

Comment 2.2.2.3-5:

"Water is an impact at the Johnson and Johnson site, due to the increase of impermeable surface and subsequent increase in water runoff. The quality of water run-off would also be degraded by containing high amounts of oil-derived residues from cars."

Response 2.2.2.3-5:

The structures and parking areas that presently exist on the Johnson & Johnson/Merck site do not present a significantly different impermeable surface area than would the proposed Park and Ride facility, with or without a parking structure. The proposed project will comply with all applicable requirements of the NPDES stormwater permit process. This may include oil traps or other structures to contain urban pollutants onsite prior to their discharge to the municipal storm drain system. This potential impact can be addressed at the time of permit review by the City, County flood control, etc.

Comment 2.2.2.3-6:

"Plant life is an impact since it appears the landscaping will be removed at the Johnson and Johnson site. This landscaping is also part of the significance of the structure. It was designed by a well known landscape architect in cooperation with the architect of the building(s). As part of the park and ride facility, there was no mention of any landscaping which could provide shade, help filter the car emissions and moderate the heat island effect of a large surface parking lot."

Response 2.2.2.3-6:

This issue is more applicable to the analysis of cultural or historic resources. Disposition of existing onsite landscaping will necessarily be tied to the fate of the Johnson & Johnson/Merck facility, because the landscaping materials do not have intrinsic biological value (i.e. no significant native trees, endangered species, etc.).

Development of either park and ride site will include landscaping to meet local standards, and significant impacts related to air quality or heat island effects should not occur.

Comment 2.2.2.3-7:

"Light and glare can be an impact both from the absence of shade, if there is no structure, and the absence of landscaping planned on the Johnson and Johnson site. There will be glare reflected off the parked cars. The night lighting may spillover onto adjacent uses. There was no discussion of shielding the night lighting or of lessening daytime glare from both the cars and the presumed open surface parking lot."

Response 2.2.2.3-7:

As stated previously, the proposed Park and Ride sites will have landscaping installed to meet local standards for either surface or structured parking. Glare should not be a significant factor due to the location of either site (in a commercial/industrial area next to the 210 Freeway). However, the issues of glare and night lighting can be better addressed at the design review stage when a specific development proposal is submitted to the City of Pasadena for review.

Comment 2.2.2.3-8:

"Land use is an impact since it does not appear that the proposed park and ride facility conforms with the intent of the newly adopted Land Use and Mobility Elements. The Johnson and Johnson site is in the E. Pasadena Specific Plan Area which encourages institutional (particularly child care), commercial and industrial uses. There is no mixed development proposed on the site using the existing structure and constructing a parking structure as an alternative to demolishing the existing building and landscaping. Various policies and objectives in the newly adopted elements encourage both transit and pedestrian oriented development. There appears to be no provision of any amenities at either proposed park and ride site. Motorists would be pedestrians between their cars and their walk to the light rail station. Would commuters walking from home or bus stops be accessing the light rail station through the park and ride facility?"

Response 2.2.2.3-8:

The Southern California Association of Governments (SCAG) recommends that land use and mobility elements of local cities accommodate park and ride facilities in appropriate locations to the greatest extent feasible. Either of these sites would be an optimum location for park and ride facilities due to proximity to the 210 freeway and the surrounding local street system. It should be noted that these two sites were added to the proposed project at the request of the City of Pasadena.

No final determination has been made as to surface or structured parking for either site. Similarly, the proposed project would allow for mixed use or reutilization of existing structures such as the Johnson & Johnson/Merck building. The provision of pedestrian facilities is best addressed at the design review stage, which would necessarily include the City of Pasadena. It is likely that local residents may walk to either Park and Ride facility, and the existing street/sidewalk system can accommodate their access.

The LACMTA has installed child care facilities at other park and ride facilities, and will likely pursue similar facilities at either of these locations.

Comment 2.2.2.3-9:

"Transportation/circulation is a possible impact since transfers between different modes of transportation are not adequately discussed."

Response 2.2.2.3-9:

It is not known at this point whether access from either site to the adjacent 210 freeway would be by an overhead or underground structure. Multi-modal access (i.e. bus, rail, pedestrian, auto) to either site would be a design consideration of site planning and development.

Comment 2.2.2.3-10:

"Cultural resources is an impact if the Johnson and Johnson structure and landscaping is demolished and if the Craftsmen houses in Highland Park are demolished. No alternatives to clearing the Johnson and Johnson site and still using the site for a park and ride facility were discussed."

Response 2.2.2.3-10:

Mitigation measures for impacts to cultural resources are thoroughly discussed in DSEIR Section 4.10. Please see response 2.2.2.5-7 for a discussion of alternatives.

2.2.2.4 Memorandum from John Jontig, City of Pasadena Public Works and Transportation Department; May 9, 1994

Comment 2.2.2.4-1:

"The City of Pasadena prefers and recommends the J & J-Merck site for station access and park and ride garage for the station at Sierra Madre Villa. The former Builders Emporium site is now occupied by a new business, Orchard Hardware Supply, and is believed to have an unwilling seller. Condemnation costs plus relocation of a major business would prove to be prohibitive."

Response 2.2.2.4-1:

Comment noted.

Comment 2.2.2.4-2:

"The Los Angeles to east Pasadena Light Rail Transit Project is the first phase of what is expected to be light rail service east to Irwindale to Azusa within or adjacent to the 210 Foothill Freeway corridor. The requirement of a 1000 car park and ride garage is so sized as the Sierra Madre Villa location will be the interim terminal station."

Response 2.2.2.4-2:

The commentor is correct in both statements.

Comment 2.2.2.4-3:

"The City requests that the SEIR consider any environmental impacts to the Sierra Madre Villa site that would occur if the 1000 car park and ride garage were reduced in size due to the relocation of the light rail terminal to the east."

Response 2.2.2.4-3:

The overall impacts identified in the SEIR would occur regardless of various factors such as internal site design, access points, etc. Relocation of a light rail terminal to the east and downsizing of the Sierra Madre Villa site would produce less impacts than identified in the SEIR, due to fewer parking spaces and the resulting lower traffic volumes. Therefore, the analysis in the SEIR represents the "worst case" situation.

Comment 2.2.2.4-4:

"There is information (MTA preliminary surface parking drawing) that indicates the MTA may intend to take two parcels (A and B) in addition to the J & J-Merck property at the Sierra Madre Villa site."

Response 2.2.2.4-4:

It is the LACMTA's intent to take the two identified parcels which were not specifically identified in SEIR graphics. The impacts of this action are anticipated to be within those already identified in the SEIR, other than the relocation of any existing businesses. This is a fiscal impact, however, which is not considered an integral part of the CEQA review process. (See Figure 2-2 in this FEIR, Section 2.3.4.)

Comment 2.2.2.4-5:

"Parcel A at the corner of Foothill Boulevard and Halstead Street contains a business that has recently spent a great deal of money in upgrading the property and business. It would be environmentally detrimental to replace an upgraded building and business with surface parking."

Response 2.2.2.4-5:

It would be an economic impact to the particular business that was displaced, and could also be a minor fiscal impact to the City if the business were to relocate outside of the City. However, these are economic impacts which are specifically excluded from consideration in the CEQA process (i.e., not part of the natural environment).

Comment 2.2.2.4-6:

"It is the City's understanding that the property owner is unwilling to sell thus a take by condemnation would be required. That action would be very costly to the MTA to cover property, business and relocation costs. A garage structure appears to be environmentally and financially sound."

Response 2.2.2.4-6:

The LACMTA will base its decision to install surface or structured parking based on a variety of factors, including cost of construction and relocation of existing businesses. The costs associated with relocating this particular business may or may not be a key factor in the decision to install a particular type of parking.

Comment 2.2.2.4-7:

"The City is concerned about the possible problems caused by horn and operational noise of light rail transit in residential neighborhoods along the alignment including some within Pasadena. There is particular interest in horn sounds reverberating in parts of the City. The frequency and sound quality of the horns is also of concern. The City would like to continue to work with the MTA on mitigation efforts to reduce noise problems. We request that the SEIR address these environmental concerns."

Response 2.2.2.4-7:

For information on train horn impacts and mitigation measures, see Response 4 to the letter from the City of South Pasadena (Section 2.2.2.8).

Comment 2.2.2.4-8:

"Pasadena Traffic Engineering staff has reviewed the Transportation and Circulation portion of the SEIR for the Pasadena-Los Angeles Light Rail Transit Project... While the mitigation provided in the SEIR appears to meet the requirements of the City of Pasadena it is recommended that the mitigations be revised as follows to ensure they appropriately address the traffic mitigations to the Foothill Boulevard traffic. Traffic control signals will have to be modified at the impacted intersections in order to make the mitigations work."

Response 2.2.2.4-8:

The LACMTA has coordinated the proposed conceptual plans at both potential Park and Ride sites with the City of Pasadena, including the Traffic Engineering department, and will continue this coordination effort and final design plans are developed.

Comment 2.2.2.4-9:

"SECTION 4.7.5.2: SIERRA MADRE VILLA PARK AND RIDE: Staff agrees with the analysis for determining which intersections will be significantly impacted by this project. Several mitigation measures will have to be revised as follows:

1. **Halstead Street and Foothill Boulevard:** The mitigation recommended is not applicable to the needs of Light Rail Park and Ride Facility. Beginning with the second sentence, the paragraph should be revised to read *"This can be accomplished by widening Halstead Street four feet from Foothill Boulevard south to the cul-de-sac to provide dual northbound left-turn lanes including protected left-turn signal phases for all directions and restriping the southbound approach to provide an exclusive right-turn lane. The eastbound approach should be restriped to provide for a minimum 100 foot long exclusive right-turn lane. This will require removing some parking along the south side of foothill boulevard. Signal timing changes and detector placements should be considered at the time of restriping."* The ICU calculations should be revised to show this mitigation (use 2880 vehicles/hour capacity for the dual left-turn).
2. **I-210 West-Bound Ramps and Sierra Madre Villa Avenue:** Parking management may create a reduction during the peak periods, but for the purpose of providing quantitative mitigation, the mitigation should be to provide dual northbound left-turn lanes onto the I-210 Freeway."

Response 2.2.2.4-9:

The LACMTA agrees to modify these mitigation measures consistent with the City's recommendations.

Comment 2.2.2.4-10:

"GENERAL COMMENT: The intersection of Rosemead Boulevard and Colorado Boulevard is not in the City of Pasadena and should be reviewed [by] the County of Los Angeles. As a comment regarding the recommended mitigation, providing an additional through lane is only valid when the new lane can be carried for a considerable distance in order to truly provide additional link capacity."

Response 2.2.2.4-10:

Comment noted. The LACMTA is coordinating street and other improvements with the appropriate jurisdictions, including the County of Los Angeles.

**2.2.2.5 Memorandum from City of Pasadena Cultural Heritage Commission;
April 19, 1994**

Comment 2.2.2.5-1:

"The Cultural Heritage Commission unanimously supports the retention and preservation of the ...[Johnson & Johnson/Merck Building, historically known as the Stuart Pharmaceutical Building]. Furthermore, this recommendation is based on the historical and cultural significance to the City of Pasadena, and the strong belief that the historically significant portions of the building can be adaptively used to the betterment of the design and function of the proposed light rail station and retain this site as a cultural resource in the East Pasadena community.

"Nationally, when we look at interstate travel - and intrastate travel within California - railroad and light rail stations have become transportation centers, creating an active area and synergy that extend beyond the movement of the trains. While not initially used as a train station, the Stuart Building offers the opportunity to establish a similar setting for the East Pasadena site. With an internationally acclaimed building, the MTA has the possibility, if not the mandate, to provide the community with something more than a vast "sea of asphalt and automobiles."

"The adaptive reuse of the building will provide additional business uses, extend the hours of the building, create interest in light rail, provide a more celebratory travel experience, and maintain an asset to the city of national significance.

"The DSEIR identifies the Johnson & Johnson/Merck Building as a cultural resource; however, it errors greatly in proposing mitigation measures for the loss of such an important building. And, the DSEIR offers no alternative to demolition, despite existing real estate studies offering many options.

"In closing we urge that MTA not only consider the reuse of the building, but review existing adaptive re-use studies. With the use of the Santa Fe Depot and the Stuart Building, the City of Pasadena would have two great transportation centers. These two centers will reflect the

growth of the city from an early resort center to a high-tech industrial center for the space age. The East Pasadena area would retain a landmark and community asset and the light rail would have wonderful entrance to the city."

Response 2.2.2.5-1:

Informational comments noted. While the SEIR identifies demolition of the Johnson & Johnson/Merck building as a worst case scenario, it does not preclude the option for adaptive reuse or at least temporary preservation of this historic structure. The LACMTA is continuing to discuss potential options for reuse, however, economic conditions have restricted current options.

Comment 2.2.2.5-2:

"[Pg. 2-5, 4-96] Demolition of the Johnson & Johnson/Merck building (historic name: Stuart Pharmaceutical Company) at 3360 East Foothill Boulevard, Pasadena, would be a significant unavoidable environmental effect that could not be mitigated to a level of insignificance by photography, measured drawings, and oral histories. The demolition should be listed on pg. 5-1 under the category of significant unavoidable environmental effects."

Response 2.2.2.5-2:

The LACMTA maintains that the proposed measures are generally accepted in the industry as adequate to mitigate cultural impacts that would occur from the loss of this facility. It is also noted that review and approval of a mitigation plan by the State Historical Preservation Officer (SHPO) is required.

Comment 2.2.2.5-3:

"[Pg. 4-89] The paragraph describing the work of Edward Durell Stone has inaccuracies (e.g., "rare example of the New Formalism style of architecture," "industrial architecture," Waldorf-Astoria Hotel)."

Response 2.2.2.5-3:

Comment noted. However, the City did not provide substitute wording or indicate which portions of the description are inaccurate. Regardless of the details, the basic conclusion that the facility is a local historical resource does not change.

Comment 2.2.2.5-4:

"[Pg. 4-90] Pasadena Heritage, a private community organization *not* the Cultural Heritage Commission, has nominated the Johnson & Johnson/Merck building for listing in the National Register of Historic Places."

Response 2.2.2.5-4:

Comment noted.

Comment 2.2.2.5-5:

"[Pg. 4-16, 4-92] Under air quality, the environmental analysis identifies the demolition of a "maximum of seven buildings at the proposed Johnson & Johnson/Merck site" and describes demolition of seven buildings as a "worst case scenario." Subsequently, under cultural resources, the report notes - unequivocally - "all of the buildings would be subject to demolition." Which statement is correct?"

Response 2.2.2.5-5:

The air quality calculations prepared for the SEIR are presented herein in Section 2.3.6.1. They include two scenarios: demolition of seven buildings or demolition of eleven buildings. Both scenarios resulted in air emissions below maximum allowable levels. The "eleven building" scenario would be the worst case alternative. However, the project allows the option of preserving these buildings in conjunction with a parking structure. The statement "would be subject to demolition" was meant to indicate the potential, not a foregone conclusion.

Comment 2.2.2.5-6:

"A decision about the National Register nomination is not the only measurement of the significance (or "status") of the Johnson & Johnson/Merck building (and findings of "exceptional significance," well beyond the thresholds for the California Environmental Quality Act, are required to list a cultural resource under fifty years old in the National Register). In 1992, the City of Pasadena's Cultural Heritage Commission determined that the building met the criteria for designation as a City "treasure" (a higher category of local landmark). Moreover, two extensively researched reports and numerous letters from scholars across the country attest to the importance of the building.

"Given this evidence, the Commission disagrees with the conclusion that a "conservative approach" to mitigation is necessary only while the National Register nomination is pending.

"The mitigation plan cannot be linked to the possibility of actual "listing" in the Register. The building will *not* be listed in the Register because the property owners have formally objected to the nomination. At this point, the State Historical Resources Commission may only forward a recommendation to the National Park Service, the agency which ultimately determines eligibility for listing."

Response 2.2.2.5-6:

The intent of paragraph 4, DSEIR page 4-93, was only to point out that structures nominated for listing in the National Register of Historic Places must be treated as if listed until a determination

is made by SHPO. The LACMTA acknowledges the local historical significance of the subject buildings, but maintains that the proposed mitigation measures are considered adequate to preserve information on the resource. It should be noted that preservation of all structures with local historical value is not practical in terms of economy or land use.

Comment 2.2.2.5-7:

"The report does not consider alternatives to the proposed demolition of the building at 3360 E. Foothill Blvd. According to the Public Resources Code of the State of California (California Environmental Quality Act, Sec. 15126), an EIR should discuss "a range of reasonable alternatives to the project ...[including] alternatives capable of eliminating any significant adverse environmental effects or reducing them to a level of insignificance, even if these alternatives would impede to some degree the attainment of the project objectives, or would be more costly." The report apparently considers the site formerly occupied by Builder's Emporium as the alternative project. Yet, it omits any discussion of adaptive reuse of the Johnson & Johnson/Merck building or of constructing a multi-level parking structure as an alternative to surface parking."

Response 2.2.2.5-7:

The original EIR examined a variety of alternatives to the overall project, as required by CEQA. There is no requirement for a supplemental EIR to examine additional alternatives unless they would reduce or eliminate a significant environmental impact. While the Johnson & Johnson/Merck facilities represent a local historical resource, the LACMTA has proposed measures to adequately mitigate impacts associated with their loss. It should be noted that preservation is not always the best alternative for older structures, but the LACMTA is willing to consider some type of preservation or adaptive reuse for these facilities if it proves to be economically viable while meeting the needs of the project.

Comment 2.2.2.5-8:

"Until release of the supplemental EIR, the understanding of the Commission was that the Metropolitan Transit Authority would explore adaptive reuse of the historic building. A March 1993 adaptive reuse study of the site (by Halcyon Real Estate Advisors/Ernst & Young) considered eight options. Two of these options proposed integrating the historic building into new development accompanying the Sierra Madre Villa light rail station. This study recognizes that adaptive reuse of the building in connection with a light rail station would be difficult because of "surface traffic issues," but no analysis of adaptive reuse or the obstacles posed by traffic circulation are included in the EIR."

Response 2.2.2.5-8:

For information on alternatives, see Response 2.2.2.5-7, above. Although the LACMTA has not ruled out adaptive reuse, recent economic conditions and transit considerations of the site severely limit the agency's options regarding adaptive reuse.

Comment 2.2.2.5-9:

"[Pg. 4-82] The locations of sound barrier walls within Pasadena are not identified in the report. At heights of four or eight feet, these walls could have an adverse visual impact on historic resources (especially if proposed for locations within the Old Pasadena National Register District)."

Response 2.2.2.5-9:

It was not the intent of this SEIR to address sound barrier walls in Pasadena. The project description (DSEIR Section 3.3.5) limits sound barrier wall modifications to Highland Park and South Pasadena. However, the City of Pasadena has been involved in the process of locating and/or reducing the height of various sound walls. The LACMTA is not aware of any sound wall location that would block views of local historical resources in Pasadena. Nonetheless, the LACMTA is willing to review the design and/or placement of any sound walls that preclude public views of significant historic resources.

2.2.2.6 Memorandum from City of Pasadena Design Commission; April 27, 1994

Comment 2.2.2.6-1:

"[Pg. 1-7] The supplemental EIR contends that the light rail project would have no significant effects on plant life, light and glare, and aesthetics. The introduction of a surface parking lot for 1,000 cars at the Sierra Madre Villa station, however, would have potentially significant effects on plant life, light and glare, and aesthetics. The parking facility, for example, would affect plant life by removing mature landscaping on the grounds of the Johnson & Johnson/Merck building. Among the notable plant life on these grounds are Mediterranean fan palms and cypress trees, orange trees, and olive trees. The illumination of 10 acres of surface parking might cause substantial light and glare, and nine acres of surface parking would visually degrade the area."

Response 2.2.2.6-1:

Information on these potential impacts are discussed in the responses to comments in the letter from Nancy Key (Responses 2 through 7 in particular), City of Pasadena Zoning and Subdivision Administration (Section 2.2.2.3).

Comment 2.2.2.6-2:

"[Pg. 2-5, 4-96] Demolition of the Johnson & Johnson/Merck building (historic name: Stuart Pharmaceutical Company) at 3360 E. Foothill Boulevard, Pasadena, would be a significant unavoidable environmental effect that could not be mitigated to a level of insignificance by photography, measured drawings, and oral histories. The demolition should be listed on pg. 5-1 under the category of significant unavoidable environmental effects. The building and its

grounds are a noted work of the internationally renowned architect, Edward Durell Stone (1902-1978), and the distinguished landscape architect, Thomas D. Church (1902-1978)."

Response 2.2.2.6-2:

This issue is discussed at length in various responses to comments by Nancy Key with the City of Pasadena and the City of Pasadena Cultural Heritage Commission. Please refer to Sections 2.2.2.3 and 2.2.2.5, above.

Comment 2.2.2.6-3:

"[Pg. 3-10] The report indicates that the Sierra Madre Villa park-and-ride facility requires 1,000 spaces. It does not, however, describe the facility in any detail. Previous studies from the Metropolitan Transportation Authority proposed (for the Johnson & Johnson/Merck site) a three-story or five-story parking structure adjacent to the Foothill Freeway. An alternative study proposed a nine-acre, surface parking lot. Without a physical description of the park-and-ride facility, no assessment of environmental effects (notably the three concerns previously cited) is possible."

Response 2.2.2.6-3:

This issue is discussed at length in various responses to comments by Nancy Key with the City of Pasadena, and the various memoranda from the City of Pasadena. Please refer to Sections 2.2.2.3 and 2.2.2.5, above.

Comment 2.2.2.6-4:

"[Pg. 4-16, 4-92] Under air quality, the environmental analysis identifies the demolition of a "maximum of seven building at the proposed Johnson & Johnson/Merck site" and describes demolition of seven buildings as a "worst case scenario." Subsequently, under cultural resources, the report notes - unequivocally - "all of the building would be subject to demolition." Which statement is correct?"

Response 2.2.2.6-4:

This comment is identical to Comment 2.2.2.5-5 from the City of Pasadena Cultural Heritage Commission. Please see Response 2.2.2.5-5, above.

Comment 2.2.2.6-5:

"The report does *not* consider alternatives to the proposed demolition of the building at 3360 E. Foothill Blvd. According to the Public Resources Code of the State of California (California Environmental Quality Act, Sec. 15126), an EIR should discuss "a range of reasonable alternatives to the project...[including] alternatives capable of eliminating any significant adverse environmental effects or reducing them to a level of insignificance, even if

these alternatives would impede to some degree the attainment of the project objectives, or would be more costly." The report apparently considers the site formerly occupied by Builder's Emporium as the alternative project. Yet, it omits any discussion of adaptive reuse of the Johnson & Johnson/Merck building or of constructing a multi-level parking structure as an alternative to surface parking."

Response 2.2.2.6-5:

This comment is identical to Comment 2.2.2.5-7 from the City of Pasadena Cultural Heritage Commission. Please see Response 2.2.2.5-7, above.

Comment 2.2.2.6-6:

"[Pg. 4-82] The locations (if any) of sound barrier walls within Pasadena are not identified in the report. At heights of four or eight feet, these walls could have an adverse visual impact on the visual character of the light rail corridor."

Response 2.2.2.6-6:

Please see Response 2.2.2.5-9, above, in the memorandum from the City of Pasadena Cultural Heritage Commission, and Response 2.2.2.8-1, below, in the letter from the City of South Pasadena.

2.2.2.7 Letter from Robert Huddy, City of Pasadena Transportation Advisory Committee; May 9, 1994

Comment 2.2.2.7-1:

"Park and Ride Facility at Foothill Boulevard and Sierra Madre Villa:

The report was general in nature and did not disclose what type of facility was to be located at the site. The Commission had information that indicated a 1000 car surface lot was to be built at this site. The Commission feels this is not appropriate for the site and would be environmentally detrimental to the area. The expected garage on the southern section of the site, next to the freeway, would be reasonable and appropriate to the site."

Response 2.2.2.7-1:

For information on the Sierra Madre Villa park and ride site, see various responses (including Response 10) in the letter from Nancy Key with the City of Pasadena. Please see Responses 2.2.2.3-2, -3, and -8; 2.2.2.4-6; and 2.2.2.5-1, -7, and -8.

Comment 2.2.2.7-2:

"Builders Emporium Site:

The former Builders Emporium site is no longer available as the site and building have been modified for a new tenant, Orchard Hardware Supply."

Response 2.2.2.7-2:

Comment Noted.

2.2.2.8 Letter from Ken Farfsing, City of South Pasadena; May 5, 1994

Comment 2.2.2.8-1:

"NOISE WALLS - There were several noise walls which did not make any apparent sense. Sections of walls were adjacent to commercial and industrial property, where they are clearly not necessary. There were several houses immediately adjacent to the alignment with no sound walls."

Response 2.2.2.8-1:

The optimum location and size of sound walls depends on many complex factors such as local topography, distance from noise sources, ambient noise levels, and local perceptions of existing noise. For example, noise levels in some locations along the project route may exceed present standards, while other areas are relatively quiet. In addition, residents in quiet areas would be more likely to perceive a greater increase in overall noise levels as a result of the project compared to areas with already high noise levels. For these reasons, the planning, design, and construction of sound walls must be coordinated with local jurisdictions to adequately mitigate potential noise impacts.

It is LACMTA's policy to work closely with local officials on the design of sound walls within their jurisdiction. To this end, the LACMTA has met on a regular basis with the cities involved on this project, including the City of South Pasadena. The information in the SEIR on location and size of sound walls was the most current available to the LACMTA. However, final design and actual construction of the sound walls for this project may change based on further input from the affected agencies.

The LACMTA will add the following measure to the mitigation monitoring plan to assure that sound walls best meet applicable noise criteria as well as aesthetic and other local needs:

"LACMTA will coordinate final design and construction of sound barrier walls with affected agencies. Final plans will be submitted to the building departments of affected agencies at least 45 days prior to the start of construction, and revised as necessary."

Comment 2.2.2.8-2:

"Arroyo Vista School requires focused sound studies."

Response 2.2.2.8-2:

The noise study in the antecedent EIR did examine the Arroyo Vista School site and recommended appropriate measures to mitigate potential noise impacts. However, the LACMTA will conduct an additional noise survey before, and will meet with school representatives to discuss the survey and mitigation design prior to proceeding with a mitigation.

To this end, the LACMTA will add the following measure to the mitigation monitoring plan:

"The LACMTA will conduct a noise survey at Arroyo Vista School to design the most appropriate noise mitigation measure. If the survey determines that applicable noise standards will not be met, the LACMTA will install additional improvements such as replacing windows or doors. Prior to constructing any improvements in this regard, the LACMTA will meet with school officials to explain the improvements and plan their installation."

Comment 2.2.2.8-3:

"I am transmitting with this letter exhibits which indicate the correct locations of noise walls. Please include these exhibits in the SEIR as the required mitigation measure for the areas within the City of South Pasadena."

Comment 2.2.2.8-3:

The LACMTA will review the exhibits provided by the City and include into them in the final sound wall design, as appropriate. It should be noted that very few of the sound walls proposed in the original EIR for South Pasadena were modified. The LACMTA lowered or shortened certain walls at the request of the community to alleviate concerns over aesthetics (i.e. walls that were too massive) and line of sight problems (i.e. by train operators and drivers at crossings). The LACMTA will also be using various offsite measures such as double-paned glass and noise resistant doors to further reduce potential noise impacts.

Comment 2.2.2.8-4:

"HORN NOISE - RCC and MTA staff met with the City of South Pasadena on April 25, 1994 to discuss the horn noise situation and wayside horn system. We were given a copy of an April 6, 1994 study of a wayside horn system. The draft SEIR should include this study. The SEIR should also state the current progress of the design of the electronic car horn.

The SEIR should include the following mitigation measures for horn noise:

1. The MTA/RCC will continue to develop the wayside horn system. Cities along the corridor will continue to be consulted on the development and implementation of the wayside horn system.
2. The RCC/MTA will use good faith efforts to seek approval of the wayside horn system from the Public Utilities Commission. RCC/MTA staff shall continue to work with PUC staff in the development and testing of the wayside horn system.
3. MTA/RCC will continue to develop and implement the electronic car horn. Cities along the corridor will be consulted on the car horn noise issue. MTA/RCC will work with the cities on the duration, pitch and other horn variables prior to the implementation of the car horns."

Response 2.2.2.8-4:

Because a wayside horn study has not yet been submitted to the CPUC for approval, it is considered too speculative to include in this SEIR. However, the LACMTA will continue its work on the wayside horn system and will implement it if, and when, approved by the CPUC.

In this regard, the LACMTA will include the following measure into the mitigation monitoring plan:

"LACMTA will continue to develop a wayside horn system and seek its approval from the CPUC. LACMTA will work with local cities regarding the duration, pitch and other horn variables prior to implementation."

Comment 2.2.2.8-5:

"TRACTION POWER STATIONS - Neither this Draft SEIR nor previous documents discuss the potential historic resource losses due to the traction power station at 1111 Magnolia Street. The property has one of the original Rancho Santa Fe homes, which is currently proposed for demolition by the RCC.

The following mitigation measures should be incorporated into the draft SEIR:

1. RCC staff shall notify the City of South Pasadena six months prior to the proposed demolition of the residence located at 1111 Magnolia Street.
2. RCC staff shall permit the City of South Pasadena to relocate the home within the six-month period. RCC shall sell the residence at a nominal value to the City.
3. All heritage trees and significant trees shall be retained on the traction power station sites. These trees shall be integrated into the final landscape development plans for the site."

Response 2.2.2.8-5:

Although the traction power station is not a subject of this SEIR, the LACMTA will incorporate the following measures into the mitigation monitoring plan:

"The LACMTA will notify the City of South Pasadena at least six months prior to demolition of the residence located at 1111 Magnolia Street. The LACMTA will permit the City to relocate the home during this period. If requested, the LACMTA will sell the residence at or below fair market value to the City. Heritage or significant trees on this site will be retained to the greatest degree feasible, and shall be integrated into the final landscape development plans for the site."

Comment 2.2.2.8-6:

"Please include these comments and mitigation measures in the Draft SEIR. The City respectfully requests a copy of the Notice of Completion in order that we may exercise our rights under CEQA in a timely manner."

Response 2.2.2.8-6:

The LACMTA has reviewed these comments and mitigation measures, and has incorporated them into this Final SEIR and Mitigation Monitoring Plan as indicated above. The LACMTA will provide a copy of the Notice of Completion to the City of South Pasadena within 5 days after the Final SEIR is certified.

2.2.2.9 Memorandum from Wilford Melton, California Department of Transportation (Caltrans); April 29, 1994

Comment 2.2.2.9-1:

"On Page 2-5, Table 2.2-1, Transportation and Circulation - the contra-flow lane proposed as a mitigation measure for access to the E/B I-210 from the Johnson & Johnson parking site will have significant traffic impacts on state facilities. Early coordination with Caltrans is recommended."

Response 2.2.2.9-1:

LACMTA understands that Caltrans will not accept a contra-flow lane for the proposed project. Significant impacts will be adequately mitigated without contra-flow lanes.

Comment 2.2.2.9-2:

"On Page 3-10, Section 3.3.7, the description should include the proposed contra-flow lane arrangement as a mitigation measure for traffic circulation impacts for access to the E/B I-210 from the Johnson & Johnson parking site."

Response 2.2.2.9-2:

Contra-flow lanes are no longer being considered for the proposed project. Significant impacts will be adequately mitigated without contra-flow lanes.

Comment 2.2.2.9-3:

On page 4-59, section 4.7.2, for projected traffic volumes for the on and off-ramps at the Sierra Madre Villa intersection, Caltrans criteria needs to be considered if it gives larger volumes."

Response 2.2.2.9-3:

During a telephone conversation between Mr. Kent Norton (of LACMTA's contractor, Tetra Tech, Inc.) and the commentor (Mr. Wilford Melton of Caltrans) on May 11, 1994, Mr. Melton indicated that the criteria of the City of Pasadena used to calculate traffic volumes at the Sierra Madre Villa intersection are appropriate and Caltrans criteria need not be considered.

**2.2.2.10 Letter from Donald Johnson, California Public Utilities Commission;
April 28, 1994**

Comment 2.2.2.10-1:

"We note... on page 3-4, Section 3.3.4.3 that reference is made to a switch yard operated by AT&SF. The Midway Yard is actually operated by SPTC."

Response 2.2.2.10-1:

Comment noted.

2.2.2.11 Letter from Kevin Sweeten, Kevin Michael Studio, Pasadena; April 26, 1994

Comment 2.2.2.11-1:

- "1. What will the site look like? A large parking lot and/or train station?
- "2. Where will passengers be going or coming from?
- "3. The asking price of that property is high. Why would the MTA need such a large and expensive piece of property anyway?"

Response 2.2.2.11-1:

1. Please refer to Figure 2-2 in Section 2.3 herein for a drawing of the proposed Johnson & Johnson/Merck Park and Ride facility. The facility will be a 1,000 car parking lot with an alternative for a future multi-level parking structure.

2. The passengers will be going between the Park and Ride facility and the station that will be located in the Foothill (210) Freeway median.
3. The property is one of three alternative sites that has been reviewed in this document and the Final EIR (LACTC, 1990.) The California Environmental Quality Act requires that projects be analyzed according to their potential impacts on the environment, irrespective of cost. Cost is, of course, a practical issue that will be considered in the selection of the final Park and Ride site. There are also hidden costs, such as hazardous waste cleanup expenses, that must be considered when comparing the three alternative sites.

2.2.2.12 Letter from King Leonard, Lacy Street Production Center; May 4, 1994

Comment 2.2.2.12-1:

"...Section 4 of this Draft SEIR identifies 'Orion Pictures' and the facilities generally as 'Railroad Industrial'. We wish to point out that Orion Pictures was simply a lessee of the facilities...but the ownership was at that time and continues to be, the present owners." (p.2)

Response 2.2.2.12-1:

Comment noted; the property is owned by Lacy Street Production Center.

Comment 2.2.2.12-2:

"Our evaluation of this Draft SEIR was hampered by missing information, missing references, and inconsistency between various CEQA documents prepared over an extended period of time." (p.3)

Response 2.2.2.12-2:

Several individuals and agencies commented on various aspects of the overall project, and it is critical to keep in mind the role this particular document plays in the CEQA process for the overall LRT (Blue Line) Project. This document is the second Supplemental EIR, which analyze aspects of the project that have been modified from the original EIR and first Supplemental EIR. Similarly, the first SEIR analyzed those aspects of the project that were modified from the original EIR. The complexity of this project, and the need for changes over time, have led to the preparation of three separate but related environmental documents. This type of document (SEIR) should not be confused with a focused EIR which would analyze in detail various technical aspects of a specific development project. The LACMTA acknowledges that this process may be confusing to the general public, but is required to meet the intent and legal requirements of CEQA. However, it must be remembered that this SEIR analyzes only the most recent changes to the proposed project and by definition does not analyze aspects that have not changed significantly from previous CEQA documents.

Comment 2.2.2.12-3:

"We noted certain information missing from this document, such as the proposed electrical booster station which is now proposed to the east of our facilities. Originally we thought this facility would be to the south of our facilities and was sufficient distance from the studios so as not to be a significant impact. We believe that this general problem of the electrical booster stations and the noise levels emitted from such facilities has not been focused on in this SEIR at a time when property purchases are eminent..."

"In some instances booster stations may require different zoning or a conditional use permit, depending upon the jurisdiction. We noted no analysis of jurisdictional requirements for these types of discretionary decisions and wondered if MTA/RCC were required to meet any such standards. At a minimum, the SEIR should address the design standard and noise/acoustical improvements that could be provided to mitigate impact of these booster stations. We believe that putting a booster station adjacent to a film studio creates very significant impacts that should be mitigated and that should be reflected in a Mitigation Monitoring Plan." (pp. 3 to 4)

Response 2.2.2.12-3:

The overall discussion of noise and land use impacts of TPSS (booster stations) was analyzed in sufficient detail in the original EIR, and is not part of this SEIR. While the subject power traction station has been moved slightly from its originally proposed location, this change is not considered significant and no additional noise or vibration impacts are anticipated. It should be noted that the LACMTA has been working with the Lacy Street Production Center due to the noise-sensitive nature of its operations. The LACMTA will identify any specific potential noise impacts to this business (from the traction power substation) and develop appropriate measures to minimize noise impacts, if necessary. The original EIR did not identify any significant land use impacts from installation of power traction stations.

Comment 2.2.2.12-4:

"We note that the State Supreme Court has held that the notice requirements of CEQA, while sufficient to encourage general public participation in the environmental decision making process, are inadequate to meet due process standards for notice on the underlying project(s) where fundamental interests are substantially affected." (p. 3)

Response 2.2.2.12-4:

The MTA considers its notification procedures adequate to meet CEQA requirements as they apply to this project. Additional notification required under a city or due process will be made at the appropriate time(s).

Comment 2.2.2.12-5:

"In the general section on noise and vibration we noted that Section 4.4.2, again needs clarification as to "Orion Pictures" and "Railroad Industrial". At a minimum the studios should be called out as a designated film studio and the acoustical standards that we provided you through the Charles M. Salter report (and again noted in the Wilson Ihrig report prepared by your office) should be properly cited in the SEIR and included as appendices." (p. 4)

Response 2.2.2.12-5:

The data and analyses provided in the SEIR regarding land use and noise standards meet local requirements and are considered adequate to identify potential impacts. However, the LACMTA periodically reviews specific requests to reduce or eliminate potential noise impacts from its operations. Site specific analyses and standards are not within the scope of this SEIR but can be addressed through a third party agreement with the LACMTA.

Comment 2.2.2.12-6:

"We noted comments by the City Administrator of Pasadena regarding horn noise and the SEIR tends to focus on some kind of decision hopefully to be rendered by the California Public Utilities Commission (CPUC). We would suggest that these kind of deliberations at the California Public Utilities Commission (CPUC) level are not a solution to the set of problems that require mitigation at the project level. It may be necessary for you to establish standards at the state level but mitigation of the problems should occur in the SEIR and be reflected in the Mitigation Monitoring Plan." (p. 4)

Response 2.2.2.12-6:

The LACMTA is currently developing a wayside horn program, which will be implemented if and when it is approved by the CPUC. For additional information, see the related Response 2.2.2.8-4 in the letter from the City of South Pasadena (Section 2.2.2.8).

Comment 2.2.2.12-7:

"As for mitigation for the vibration impacts from the proposed transit system, we continue to believe that BMC or BMS construction should be included to the rear of the Lacy Street Production Center and shown in Table 4.4-10. We believe that the elimination of sound walls generally may not be good where trains are approaching the 26th Street Station on a curve. Additionally, a low wall along and adjacent to the tracks would eliminate much of the wheel noise that will probably occur in the future... Additionally, the track area has some drainage problems associated with it and since our buildings are directly abutting the railroad right of way we believe the drainage problem should be resolved prior to construction of the Pasadena Blue Line... We would propose that mitigation of vibration and noise impacts be accomplished before construction is undertaken in 1995 so that filming can continue uninterrupted.

"Our preferred alternative, as recommended in the Salter report, is a barn/tunnel type enclosure of the transit line behind the studios, approximately 600 feet in length. However, we have suggested to your staff that a logical method of handling any on-site mitigation is a third party agreement similar to that used by the Bay Area Rapid Transit District... PUC Section 180106(b) permits transit authorities broad latitude in hiring and contracting. PUC Section 180154 governs bidding procedures and provides MTA/RCC with more than adequate legal protection for undertaking third party type agreements.

"The SEIR provides some indication of site specific mitigation measures but these have not been offered to Lacy Production Studios in our discussions with staff. An example would be the replacement of windows and special treatment of older buildings. The SEIR does speak to the issue of "historic buildings" but does not recognize the studio as having historic character. We would suggest that the historic buildings are no different than many of the older buildings in China Town, along Lacy Street, or in the Pasadena area. When a transit system is developed in older areas of a city then special architectural treatment and acoustical treatments are required. This kind of work cannot be generically treated in a transit authorities Line Construction Standards Manual.

"In Table 4.4-2 the footnote references to vibration measurement locations should be clarified. We're not certain that the public knows what the "WIA, 1993" report is about. Does this include the Wilson Ihrig report completed for the studios? The test below refers to more restrictive criteria, however there is no mention of motion picture studios and the NC35 criterion in the Wilson Ihrig Report.

"Under "off-site mitigation", page 4-41, no mention is made of older buildings such as the studios where sealing entire buildings to mitigate noise and vibration will result in need for additional air conditioning units...

"Station construction and operation will require different considerations with respect to the studios. A portion of the "chop shop", indicated on Figure 2 as the garage set, abuts the 26th Street Station area. The need to mitigate noise levels on this side of the complex is critical and there needs to be considerable thought given to the architectural treatment along 26th Street as it relates to the station architecture (textures, colors, materials). The increased levels of noise from doors, horns, gongs, and parking lot activity should be considered in the SEIR and mitigated for an important facility such as a motion picture studio." (pp. 4 through 6)

Response 2.2.2.12-7:

The location, height, and length of sound walls, proposed in this (second) SEIR, as well as those previously proposed in the EIR and first SEIR, were determined by calculating potential noise impacts on sensitive receptors compared to local noise standards. This also applies to off-site mitigation recommended for sensitive receptors in this document. The site specific information provided in this comment is not within the scope of this SEIR, but should be addressed through a third party agreement with the LACMTA.

This SEIR does not analyze stations or other facilities to be constructed that were already addressed in the original EIR and first SEIR, and where no significant changes have occurred to the project and/or related facilities.

Comment 2.2.2.12-8:

"As a general comment we noted that there is no mention of the timing of mitigation measures or construction. A schedule should be part of the Mitigation Monitoring Plan." (p. 6)

Response 2.2.2.12-8:

The Mitigation Monitoring Plan will include the timing of measures and construction. It will also include a general schedule for construction, pre-operation, and other milestones needed to implement the project.

Comment 2.2.2.12-9:

"We have previously provided your staff with information regarding the Department of Water & Power (DWP) facilities being constructed to the south of our facilities. There appears to be no information in the SEIR regarding permits in the pipeline, types of permits, construction under way on other properties and the cumulative implications of transit to these land uses." (p. 6)

Response 2.2.2.12-9:

Construction of the DWP facilities is not within the scope of this SEIR. Impacts from the new DPW facilities should have been addressed in the environmental documentation for those facilities. However, related construction will meet all permitting requirements of applicable agencies. (See Table 1.1-1 in the DSEIR.)

Comment 2.2.2.12-10:

"Other impacts to the Lacy Street Production Center will include reverberation of noise from the new DWP high rise building south of the studios, loss of outdoor filming areas, loss of light and ventilation, and the psychological impact on location managers due to passing trains. We are continuing to work with our staff on finding solutions to these problems as directed by your Board in August of 1993." (p. 6)

Response 2.2.2.12-10:

Impacts from the new DWP facilities should have been addressed in the environmental documentation for those facilities. For additional information on mitigation, see Responses 2.2.2.12-3 and 2.2.2.12-6. However, the scope of this SEIR is not intended to cover the Lacy Street Production Center.

Comment 2.2.2.12-11:

"SUMMARY AND CONCLUSIONS:

- "A. Very significant, unavoidable, and cumulative impacts, particularly to the Lacy Street Production Center and the number of people employed in the center each year, should be recognized in this SEIR.
- "B. Project objectives should be expanded in the Initial Study to include recognition of the importance of land use changes and impacts upon specialized facilities such as motion picture studios and older structures." (p.6)

Response 2.2.2.12-11:

As outlined previously, these concerns are outside the scope of this SEIR, and most impacts are either not significant or can be reduced to a level below significance by the implementation of the mitigation measures recommended in the FEIR (LACMTA, 1990). LACTC will continue to meet with representatives from Lacy Street Production Center to resolve their specific issues.

Comment 2.2.2.12-12:

"SUMMARY AND CONCLUSIONS...

- "C. There are two essential tests that an SEIR must pass. It must focus upon substantial new information of importance to a project and it must include information necessary to make the previous EIR adequate for the project as revised [CEQA guidelines, Section 15163 (b)]. This SEIR does not appear to meet either of these tests as we understand the CEQA process and based upon the information we have previously provided to your office in this letter." (p.6)

Response 2.2.2.12-12:

The commentor is incorrect; the LACMTA believes that this SEIR does provide "information necessary to make the previous EIR adequate for the project as revised." The commentor may be confusing the requirements of a focused EIR with a Supplemental EIR, as described in previous Response 2.2.2.12-2.

Comment 2.2.2.12-13:

"SUMMARY AND CONCLUSIONS...

"D. Some references and footnotes are unclear and misleading. These need to be cleaned up and additional information provided in this SEIR if the document is to meet the test of adequacy and completeness.

"E. The need for recirculation of this SEIR appears to be necessary after revisions are made. We would like to have a copy of the recirculated document when it is available for public review." (p.7)

Response 2.2.2.12-13:

Some references and footnotes in the draft document may receive minor revisions in the final document. However, the commentor does not indicate which items are either unclear or misleading. The LACMTA maintains that this document contains information of sufficient depth and detail to allow for informed public review and decision-making by elected officials.

Comment 2.2.2.12-14:

"SUMMARY AND CONCLUSIONS...

"F. We have continually asked for Public notices. In December we did not receive notice that an SEIR was being prepared. Through other sources we found that the document had been prepared but it was late in arriving, and consequently our time to prepare comments was reduced. We went to the public meeting held in Highland Park in which the documents were to be presented but they were not available."

Response 2.2.2.12-14:

As stated in Response 2.2.2.12-4, the LACMTA considers its notification procedures adequate to meet CEQA requirements as they apply to this project. Additional notification required under city or due process will be made at the appropriate time(s). The proposed project modifications do not impact the alignment near Lacy Street Production Center. The public meeting attended by Lacy Street Production Center personnel was not associated with the CEQA/SEIR process. Documents were available at the public hearing (April 13, 1994) for the SEIR, as published in local newspapers.

Comment 2.2.2.12-15:

"The type of analysis required when an SEIR is prepared at the project level is necessarily more detailed and, in this case, requires higher levels of analysis. This can only be accomplished with adequate architectural and engineering studies running concurrently with work being undertaken by MTA/RCC." (p. 7)

Response 2.2.2.12-15:

The commentor statements are appropriate to a focused project EIR, but not to a Supplemental EIR. The latter document need only address those aspects of the project that have changed from previous environmental documents (in this case, the original FEIR and first SEIR). The level of detail is determined by the characteristics of the project changes, not the overall level of detail represented by the total project.

**2.2.2.13 Letter from Sharon Lowe, Legal Aid Foundation of Los Angeles;
May 9, 1994**

Comment 2.2.2.13-1:

"Construction Air Quality Impacts: Demolition of Buildings.

The Draft SEIR discloses the potential exposure of the community to asbestos, however it is deficient in that it fails to disclose the even greater potential of exposure of the community to lead during the proposed demolition of subsequently acquired residential structures, particularly along the Marmion Way Corridor in the Highland Park community and the greater potential of fugitive contaminated lead dust particles therefrom. The residential structures proposed to be acquired and subsequently demolished are significantly older structures and have a high probability of lead-based paint throughout them. As a result of this failure, the Draft SEIR is inadequate in its failure to analyze the extent of this potentially significant environmental impact to the air quality and human health of the impacted communities or to propose any mitigations thereof.

Impacts Mitigated to Insignificance by Existing Regulations.

For the reasons stated above, the proposed mitigations are inadequate. The statement within the Draft SEIR that existing regulations render the environmental impacts insignificant is insulting and erroneous. The standard is reasonableness and regulations are generally construed as minimum standards to be applied. Reasonableness is to be determined as to the direct impact and application on the affected communities/residents/businesses.

Minimum standards for lead-based paint removal and encapsulation have been developed. However, the Draft SEIR is void of any information with regards to the various types of mitigation measures in relation to the removal of lead-based paint. Appropriately tailored analysis and application must be conducted based on the nature and demographics of the densely populated residential community of Highland Park. Reasonableness requires a specific mitigation monitoring implementation plan coordinated with the impacted communities which include but is not limited to the following elements of: community-based and culturally sensitive involvement through contacts with impacted communities' schools, preschools, churches, parks and recreation centers, senior centers; notice and dissemination of information to impacted communities in languages spoken, including but not limited to English, Spanish, Chinese, Vietnamese and Tagalog re: all findings relating to existence of lead and asbestos

and/or any other hazardous materials; schedule of demolition; potential and projected impacts on adjacent residents (health, access impacts, street closures, haul routes) specific types of mitigation measures such as twice daily water spraying; washing down of equipment, streets, hours of construction, etc; and joint development of a mitigation monitoring and implementation plan."

Response 2.2.2.13-1:

The LACMTA has already established procedures for assessing potential lead and asbestos contamination of houses to be demolished. These procedures are based on applicable local, regional (SCAQMD), state, and federal (NESHAPS) regulations, including sampling and removal protocols. These procedures, and the regulations upon which they are based, are designed to minimize human exposure to hazardous compounds such as lead and asbestos, particularly during the demolition of older residential structures where there is more likelihood of finding such materials. These regulations provide reasonable, practical, and cost effective methods of removing such hazardous materials, which is why it is especially important to note their contribution to maintaining public health and safety during demolition of older structures.

The LACMTA will add the following measure to the mitigation monitoring plan to identify its procedures for alleviating hazardous materials from structures to be demolished:

"LACMTA's Construction Manager will ensure that all applicable safety regulations are followed relative to hazardous materials (e.g. removal, encapsulation, etc.) during demolition of older structures. The Construction Manager will prepare an annual report for review by the MTA/RCC Boards. Each Board will take appropriate action as needed to prevent unsafe exposure of the public to hazardous materials from its demolition activities."

Comment 2.2.2.13-2:

"Noise Mitigation

"Draft SEIR's discussion of proposed mitigation measures are inadequate in that it fails to address the potential of its proposed mitigations to create resultant and significant socio-economic environmental impacts in the form of community urban blight.

"The proposed noise mitigations of lower sound barrier walls and acquisition of noise easements could potentially result in the creation of community urban blight along the Marmion Way Corridor of Highland Park. The Draft SEIR is deficient of any analysis with regards to the potential long term socioeconomic impact of "prime target graffiti walls" along the entire length of the Marmion Way Corridor.

"No proposed mitigation measures and/or monitoring implementation maintenance plan exists in the Draft SEIR re: ongoing maintenance and/or landscape buffering of the negative visual aspects of the proposed sound barrier walls. Recommendation is made to consult and include

the Highland Park community's artist colony with regards to creative and collaborative maintenance mitigation measures.

"The Draft SEIR was also deficient of any analysis of long term real estate devaluation of properties on which noise easements are acquired and on adjacent properties as a result of the existence of such easements on their neighbors' properties. The Draft SEIR proposes compensation of current property owners, which is a bare minimum standard, however no mitigation is proposed or explored with regards to the long term land devaluation to the Highland Park community and the potential to create a blighted corridor along the length of Marmion Way.

"The Draft SEIR fails to analyze the most detrimental impact of its proposed noise mitigations in that they will create an entire corridor of residences along Marmion Way which are likely to become blighted in the near future. The value and desirability of the residences will further decrease as a result of the implementation of these proposed mitigation measures. Impacted property owners will be unmotivated to upkeep their properties, causing them to fall into disrepair. Thus, the proposed project has created an unmitigated significant environmental impact, i.e., urban blight.

"In the FEIR prepared and certified by the County of Los Angeles for its proposed LAC-USC Medical Center Replacement Project (April 12, 1994), the County clearly acknowledged that its proposed project would have an adverse socio-economic impact on "strip" residences adjacent to but not included within its project site and the remaining community as a result of the isolation and physical location next to a 3000 car eight-story parking structure.

"We recommend inclusion of analogous language in the Final SEIR with regards to LACMTA acknowledging the significant adverse impact on the remaining Marmion Way Corridor of Highland Park. As a separate but concurrent action with the certification of the Final SEIR and approval of the proposed project, we recommend that the LACMTA authorize a feasibility study be prepared to determine and assess the LACMTA's and the residents' joint options to prevent further adverse socio-economic impact to the Marmion Way Corridor of Highland Park such as blight, including but not limited to the exploration of acquisition and "park-like landscaped" open space re-use buffer zone and/or off-street parking for adjacent residents only.

"At the bare minimum, the Draft SEIR should conduct environmental analysis of the unmitigated blight that will be created by the implementation of the project's proposed noise mitigations. The proposed mitigation of such blight and its resultant socio-economic impact on the adjacent communities abutting the project must be identified."

Response 2.2.2.13-2:

The LACMTA has had several years of experience in creating transportation corridors in surrounding urban areas. In this time, the LACMTA has observed no evidence supporting the belief that its light rail corridors create urban blight. The addition of sound walls, or any type

of public wall or building, does increase the opportunity for graffiti. To date, the LACMTA has been very successful in controlling graffiti, even in areas that experience high crime and vandalism.

If the argument is accepted that sound walls do contribute to the creation of blighted corridors, lower or less extensive walls, as proposed in this SEIR, should produce comparatively less impacts than those walls proposed in the original EIR or the first SEIR.

In addition, houses located near new rail stations should actually appreciate in value due to the proximity to a valuable and convenient public improvement. The LACMTA maintains that neighborhood disinvestment is not a natural result of constructing sound walls, but is rather a consequence of neighborhood decline. In fact, many social observers have concluded that neighborhood decline is not necessarily a foregone consequence of neighborhood recycling, but is indicative of the type of neighborhood being studied. In other words, "stronger" neighborhoods can resist or even benefit by outside perturbations such as the addition of a public transit corridor, while "weaker" neighborhoods (i.e. those more susceptible to negative conditions) might succumb to this and other pressures to decline. The key is the condition of the neighborhood, which is more a function of the resolve, commitment, and attitudes of the local residents rather than on the physical conditions of structures (although outward appearances are often signs of local attitudes about the neighborhood).

For additional information on meeting community needs relative to the size and location of sound walls, please see the responses to comments from the City of South Pasadena (Section 2.2.2.8).

The LACMTA proposes the following measure be added to the mitigation monitoring plan to help prevent the creation of blighted urban corridors:

"LACMTA will establish a program specifically for graffiti/tagging removal, installing landscaping on or along sound walls, and mural painting to create a more aesthetically pleasing urban environment. The LACMTA/RCC Boards will establish a fund for a two-year pilot project in this regard, and review its progress annually to determine if, or at what level, it will receive future funding. This program will be implemented by the LACMTA's Environmental Department which will prepare an annual report for review by the LACMTA/RCC Boards. The LACMTA will work with the artist colonies in Highland Park and elsewhere to identify the most appropriate locations for community murals to reduce the potential for graffiti or tagging."

Comment 2.2.2.13-3:

"Total Parcel Acquisitions

"The statement within the Draft SEIR that existing regulations render the environmental impacts insignificant is insulting and erroneous. The standard is reasonableness and regulations are generally construed as minimum standards to be applied. Reasonableness is to

be determined as to the direct impact and application on the affected communities/residents/businesses.

"The Draft SEIR fails to provide any analysis of the significant environmental impacts on the City of Los Angeles' Housing Element Component of the City's General Plan. As of 1989, the City of Los Angeles had identified a need of 27,270 lower income dwelling units and had produced only 13,951 such units or 51%. (Local Progress in Meeting the Low Income Housing Challenge, California Coalition for Rural Housing, 1989). Furthermore, as of 1991, the City of Los Angeles was found by the State not to be in compliance with its own Housing Element.

"The Draft SEIR is further void of any analysis of the significant environmental impacts on the County of Los Angeles' Housing Element Component of the County's General Plan. As of 1989 the unincorporated portion of the County of Los Angeles had identified a need of 15,735 lower income dwelling units and had produced only 1,815 such units or a mere 12%. (Local Progress in Meeting the Low Income Housing Challenge, California Coalition for Rural Housing, 1989). The total Los Angeles County need for lower income dwelling units is 67,745 and as of 1989, only 22,425 (33%) such units have been produced throughout the county. (Local Progress in Meeting the Low Income Housing Challenge, California Coalition for Rural Housing, 1989).

"Therefore, the proposed elimination of an unidentified number of units of affordable housing is clearly a significant environmental impact on a worsening city-wide and county-wide affordable housing need, which the Draft SEIR has not only failed to analyze, but also fails to mitigate. In addition, the Draft SEIR fails to analyze the cumulative impact on the loss of housing by the proposed additional acquisitions with its existing proposed taking of residences in conjunction with the French Street Station and such projects as the County's proposed LAC-USC Medical Replacement Project which will result in the loss of 160 units and the displacement of 205 households.

"The proposed Draft SEIR proposes no mitigation and this fails to adequately address the need for replacement housing for the unidentified number of affordable housing units that will be destroyed, and the unidentified number of households that will be displaced.

"When a public entity displaces residents as a result of any displacing activity (demolition, rehabilitation, eminent domain, etc.), the public entity is required to provide those displaced persons with relocation assistance to assure that within a reasonable period of time, the displaced person is able to relocate to a "comparable replacement dwelling." (Gov. Code Section 7261). "Comparable replacement dwelling" is defined as

...any dwelling that is all of the following:

- (1) Decent, safe, and sanitary.
- (2) Adequate in size to accommodate the occupants.
- (3) In the case of a displaced person who is a renter, within the financial means of the displaced persons. A comparable replacement dwelling is within the financial means of

a displaced person if the monthly rental cost of the dwelling minus any replacement housing payment available to the person does not exceed 25 percent of the person's average monthly income.

(4) Comparable with respect to the number of rooms, habitable space, and type and quality of construction...

(5) in an area not subject to unreasonable adverse environmental conditions.

(6) in a location generally not less desirable than the location of the displaced persons dwelling with respect to public utilities, facilities, services, and the displaced person's place of employment. (Gov.Code Section 7260).

"However, where no comparable replacement dwelling is available to a displaced person, and the public entity determines that a comparable replacement dwelling cannot otherwise be provided, the public entity is responsible for providing a comparable replacement dwelling through "any action necessary or appropriate to provide the dwellings by use of funds authorized for the project." (Gov. Code Section 7264.5; see also 42 USC Section 4626, "such action as is necessary or appropriate to provide such housing by use of funds authorized for such project").

"The statutory directive in Government Code Section 7264.5 is supplemented by the California Administrative Code in that "no person shall be required to move from his dwelling...unless comparable replacement housing is available," and a public entity "may not proceed with any phase of a project ... or shall terminate or suspend further implementation of the project activities ... unless it provides such housing." (Cal. Admin.Code, tit 25, Section 6054).

"The Draft SEIR is void of any analysis of the volume and/or socio-economic make-up of the impacted households to be displaced by the proposed project. Thus no analysis exists as to whether or not "comparable replacement dwellings" are available. The Draft SEIR further fails to respond to this critical environmental impact with any proposed mitigation.

"Both the Federal and State replacement housing laws require that where the public entity taking housing units cannot locate comparable replacement dwellings for the displaced households, the public entity is required to provide dwellings for those households by any action which is necessary. (Gov.Code Section 7264.5; Cal. Admin. Code, Tit 25, Section 605; USC Section 4626; 49 Code of Federal Regulations, Section 24.404 (1992); McKenon v. Hastings College of Law 230 Cal.Rptr. 176, 186-87, 185 Cal.App.3e 896 (1986); Osburn v. Department of Transportation 270 Cal.Rptr. 761, 765, 221 Cal.App.3d 1347 (1990)).

"The Federal Code of Regulations lists several means by which the public entity can provide comparable replacement housing: 1) rehabilitation of and/or additions to an existing replacement dwelling, 2) construction of a new replacement dwelling, 3) relocation and, if necessary, rehabilitation of a dwelling, and 4) purchase of land and/or replacement dwelling by the displacing entity and subsequent sale or lease to, or exchange with a displaced household. (Code of Fed. Reg., Section 24.404(c)(1)).

"In such instances, precedence exists for the implementation of mitigation measures such as the creation of replacement housing trust funds to assist nonprofit developers to construct the actual replacement housing units of analogous type within the impact communities abutting the proposed project. The Century Freeway Expansion Housing Trust Fund is an example of such mitigation measures.

"Thus the final SEIR must include a plan for how the LACMTA will provide housing units for the number of households for which there is no available comparable replacement dwelling. This replacement housing plan must be done immediately so that the replacement housing is available prior to the dislocation of any household. Without such replacement housing being made available, the LACMTA cannot proceed with any part of the proposed project (Cal.Admin.Code, tit 25, Section 6054).

"In the instances where replacement housing units are identified, the Final SEIR must state such replacement housing meets the criteria set forth in Government Code Section 7260 (i) and 442 USC Section 4623(a)(1)(A) and 4624(2).

"The Final SEIR is deficient of any analysis as to the availability of comparable replacement dwellings for the rental and homeowner households that will be displaced by the project.

"*Draft SEIR is void of information indicating that the replacement dwellings are "decent, safe, and sanitary." (Gov.Code Section 7260(i)(1)).

*Draft SEIR is void of information indicating that the replacement dwellings are comparable "with respect to the habitable space, and the type and quality of construction." (Gov. Code Section 7260(i)(4)). A large majority of the displaced renter households will be displaced from dwellings which were single family residences.

*Draft SEIR is void of information indicating that the replacement dwellings are comparable with respect to location. (Gov.Code Section 7260(i)(6)).

"The Final SEIR must include a comprehensive evaluation of available replacement housing. Without more specific information, the facts upon which the LACMTA is relying to document the availability of replacement housing is deficient under the law. (Keith v. Volpe)."

Response 2.2.2.13-3:

Despite the length and detail of the arguments offered by LAFLA, the discussion of property acquisition impacts in this document hinges on the requirements of CEQA versus those found in other parts of the California Government Code regarding relocation of residents displaced by condemnation procedures.

CEQA in fact does not require the depth or complexity of socioeconomic analyses argued by the commentor. However, local agencies are required to prepare relocation plans and programs to assess the economic conditions of those who may be relocated by agency activities. An agency pursuing relocation is required to meet a host of state and federal

housing requirements. The LACMTA has and will continue to comply with applicable regulations as part of its relocation activities.

The commentor has quoted and referred extensively from various state and federal housing relocation regulations. The LACMTA's actions in the past have been consistent with these regulations regarding the relocation of residents displaced by LACMTA projects. The LACMTA commits to meeting these and subsequent regulations in this regard on future projects.

There does not appear to be a present need to establish a separate housing trust fund within LACMTA as suggested by the commentor. The proposed project changes as addressed in this SEIR will only remove six additional units, which does not represent a significant impact on regional housing stock. Given current economic conditions, adequate replacement housing should be available in the immediate or surrounding area at comparable costs. However, the determination of unit availability, unit conditions (e.g. decent, safe, and sanitary), unit type, and location are part of the LACMTA relocation assistance process, and not the purview of this CEQA document.

The commentor is incorrect in asserting that the SEIR is deficient under state law because it does not include a "comprehensive evaluation of available replacement housing." The LACMTA maintains that the SEIR is adequate as it fulfills the requirements of CEQA.

Comment 2.2.2.13-4:

"On behalf of our clients, we strongly propose adoption and inclusion of language regarding the mitigation measures provided in the FEIR prepared and certified by the County of Los Angeles for its proposed LAC-USC Medical Center Replacement Project (April 12, 1994) [See pages 290-211 of FEIR and relevant responses to DEIR comments, State Clearing House No. 92101010]. The issues and concerns raised by the community in conjunction with that project are the same as those raised by our clients in connection with the LACMTA's proposed project. Thus the LACMTA should follow the lead of the County and adopt similarly and appropriately tailored mitigation measures to address community and impacted residents' concerns regarding displacee issues; relocation assistance issues; and one for one replacement housing needs issues as it relates to affordability, type (single family/homeownership) and physical location within the impacted communities.

"In adopting its proposed mitigation measures, the County acted in good faith to reflect the intent of the applicable laws governing relocation of displaced residents, i.e., to implement the legislature's attempt to render the adversely impact displaced residence "whole" again to as great an extent as is feasibly possible. To this end, the Final SEIR should include similar language which acknowledges the cumulative adverse environmental impact on the affordable housing needs of the Northeast communities through its displacement of households in the Highland Park community. The LACMTA should further acknowledge the severe hardship its project will have on these displaced residents, and therefore should include language within the Final SEIR of the intent of the LACMTA to adopt an adequate mitigation measure in the form of a Relocation Assistance Program Plan for the proposed project, which will be customized,

applied and implemented in a sensitive manner to render the residents as "whole as is feasibly possible" according to their individual needs and situations."

Response 2.2.2.13-4:

LACMTA staff have reviewed the analysis and mitigation measures referred to by the commentor in the LAC-USC EIR. The LACMTA maintains its relocation program fulfills the intent and requirements of state and federal housing regulations. A copy of the socioeconomic section from the LAC-USR EIR is included in this document for reference. It should be noted the data used in the LAC-USR EIR is applicable to the proposed project because the two projects are in the same geographic area. The LACMTA will continue to assist residents and businesses, as appropriate, as part of its rail construction projects. Due to current economic conditions and the small number of units to be demolished by this project, there is no need for LACMTA to initiate a program to create new affordable housing at this time.

The number of units proposed for removal is the minimum needed to achieve safe emergency access which will actually benefit the entire neighborhood. As stated previously, the LACMTA already operates a relocation assistance program for its projects, which will be sensitive to the relocation needs of affected residents.

Comment 2.2.2.13-5:

"Partial Parcel Acquisitions

"The Draft SEIR fails to analyze the cumulative impacts of its failure to mitigate the detrimental impact of creating an entire corridor of residences along Marmion Way which are likely to become blighted in the near future. The value and desirability of the residences will decrease further as a result of the implementation of these proposed mitigation measures. Impacted property owners will be unmotivated to upkeep their properties, causing them to fall into disrepair. Thus, the proposed project has created an unmitigated significant environmental impact, i.e., urban blight.

"The Draft SEIR is also deficient of any analysis of long term real estate devaluation of properties on which partial acquisition will occur and on adjacent properties as a result of the existence of the reduction of front or back yard areas, reduced vehicle access, and/or loss of parking. The Draft SEIR proposes compensation of current property owners, which is a bare minimum standard, however no mitigation is proposed or explored with regards to the long term land devaluation to the Highland Park community and the potential to create a blighted corridor along the length of Marmion Way.

"As stated in Section II above, we make reference to the FEIR prepared and certified by the County of Los Angeles for its proposed LAC-USC Medical Center Replacement Project (April 12, 1994), and propose the same recommendation as stated therein above."

Response 2.2.2.13-5:

The commentor assumes that the improvements proposed as part of this project will by themselves create blighted conditions along Marmion Way. In fact, the proposed improvements will likely benefit local residents by providing better emergency access, create a public transit station within the community that local residents can use, and incrementally improve the underutilized conditions that presently exist in the area. For additional information on the potential for the proposed project to create blight, see Responses 2.2.2.13-2 and 2.2.2.13-4.

Comment 2.2.2.13-6:

"Transportation and Circulation

"The draft SEIR fails to address the cumulative impact that the proposed five additional street closures and the partial parcel acquisitions will have on the on-street parking in the area. The impacted Highland Park community consists of older residential structures with limited to no off-street parking, and the loss of existing off-street parking will further exasperate this parking need. Thus, the Draft SEIR is deficient for its failure to provide or otherwise propose any mitigation measures for this negative environmental parking impact."

Response 2.2.2.13-6:

The traffic analysis in the SEIR indicates that traffic circulation conditions in the affected neighborhoods will actually improve as a result of the street closures. It is especially important to note that, with the planned increase in daily rail traffic in these areas, the street improvements planned along with the closures will improve overall safety and circulation.

Contrary to the assertion of the commentor, very little on-street parking will actually be lost as a result of the project. Six informal covered parking spaces will be lost along Marmion Way, but there is adequate on-street parking still available on Avenue 57 and along the south side of Marmion Way. Because the area to be lost is presently unimproved and the six parking structures mentioned above do not have building permits, this impact is not considered significant.

Comment 2.2.2.13-7:

"Human Health

"All of the concerns and comments stated above in Section 1 are incorporated by reference herein. Especially as they relate to the failure to address potential lead exposure during the construction/demolition of buildings phases."

Response 2.2.2.13-7:

For a discussion of hazardous materials related to demolition, see the previous Response 2.2.2.13-1.

Comment 2.2.2.13-8:

"Cumulative Impacts

"Concerns and comments regarding the cumulative impacts of the proposed project are stated above in Sections III and IV are incorporated herein by reference."

Response 2.2.2.13-8:

Section 2.3 in the DSEIR addresses cumulative impacts of the project. In addition, the previous responses to comments have addressed various cumulative impact topics, such as hazardous materials (2.2.2.13-1), neighborhood blight (2.2.2.13-2, -4, and -5), housing (2.2.2.13-3), and traffic (2.2.2.13-6). The previous EIR also examined the cumulative impacts of this and other related projects, as required by CEQA. The changes proposed in and analyzed by this SEIR do not change the previous analysis or conclusions regarding cumulative impacts of this project.

Comment 2.2.2.13-9:

"Conclusion

"For all the reasons stated above, the Draft SEIR is deficient in that it fails to adequately inform the public as to the extent and magnitude of the proposed project's negative environmental impacts and the reasonableness of the Draft SEIR's proposed mitigation measures. The public is thereby denied its mandated opportunity to adequately comment thereon."

Response 2.2.2.13-9:

The LACMTA maintains that this SEIR is adequate and fulfills its function under CEQA. It properly analyzes proposed changes to the original project, and proposes reasonable and feasible mitigation measures applicable to those changes. The LACMTA further maintains that the public has had adequate opportunity to review and comment on this SEIR.

2.2.2.14 Letter From T.A. Nelson, P.E., Consulting Engineer; May 2, 1994

Comment 2.2.2.14-1:

"Page 4-35 -- Sound levels along Marmion Way may not be intrusive to residents. A sound that is expected and occurs regularly, if not overly excessive, is often ignored. This has been my experience, having lived and attended school next to streets carrying electric interurban lines. Walls tend to divide communities; landscaping may be substituted. The lower sound level emitted by the new L.A. Standard LRVs may be acceptable without external mitigating measures."

Response 2.2.2.14-1:

The noise analysis in the SEIR identified 57 residences in the Mount Washington area, and 48 residences or buildings in South Pasadena, that may experience adverse noise impacts from the project. However, measures have been recommended in the SEIR which mitigate these impacts to the greatest extent feasible. Although it is possible that actual impacts may be less than expected, the noise analysis is based on accepted procedures which are used to provide a "worst case" estimate of potential impacts.

Comment 2.2.2.14-2:

"Page 4-58, 4.7.1.3 -- A drawing of the Marmion Way/Figueroa St. below-grade separation should be included with the Final SEIR."

Response 2.2.2.14-2:

See Figure 2-1 in Section 2.3 in this FSEIR.

Comment 2.2.2.14-3:

"Page 4-63, 4.7.3.3 -- Due to the nature of excavations, a below-grade separation at Figueroa/Marmion will have greater construction impacts than an aerial structure. Figueroa will probably be narrowed or detoured during construction."

Response 2.2.2.14-3:

Compared to an aerial structure, a below-grade separation would have greater construction impacts from excavation. However, impacts from constructing either structure would be temporary and are not considered significant. An aerial structure would also create adverse visual impacts in the surrounding community.

Comment 2.2.2.14-4:

"Based on preliminary drawings, it appears that residents southwest of French Ave. will lose direct access to Pasadena Ave. via French and will be required to use Ave. 37. This negative impacts may be considered mitigated by the improved access to an LRT station at French Ave. compared to the previously planned station location at Figueroa St. the realignment of Pasadena Ave. with Marmion Way at Figueroa does improve the street system."

Response 2.2.2.14-4:

As previously stated, construction of the Figueroa Street station will improve overall access in the immediate area. The closure of French Avenue is addressed in Section 2.3.6 of this FSEIR.

Comment 2.2.2.14-5:

"Page 4-82, 4.8.3.3 -- Criminal activity in the below-grade separation at Figueroa may be limited by strategically placed fencing and lighting. Monitoring may be possible from closed-circuit video cameras mounted either side of Avenue 37 and Figueroa, if they can be made theft proof."

Response 2.2.2.14-5:

All new LACMTA facilities, including the below-grade separation and stations, will be designed to limit unauthorized activities. The LACMTA will employ methods, designs and surveillance systems proven effective in previous applications, such as closed circuit TV and fencing.

Comment 2.2.2.14-6:

"In referring to utilities relocation, the most important entity was omitted, the Dept. of Water and Power. The Gas Co., Pac Tel, and TV cable company may be involved, also."

Response 2.2.2.14-6:

Comment noted. The appropriate public or private companies will be contacted regarding utility relocation, as required by state (CPUC) regulations and local (City of Los Angeles, etc.) regulations.

**2.2.2.15 Letter from Sally Neubauer, Citizens Committee to Save Elysian Park;
May 6, 1994**

Comment 2.2.2.15-1:

"(In) the original EIR document, the Midway Yard was listed along with Taylor Yard and the Cornfield-Bullring Yard as a potential site for a maintenance facility, but in a subsequent paragraph was dismissed as being too small. Now MTA has decided to use the yard that is...too small..."

Response 2.2.2.15-1:

In the original EIR, the Midway Yard was proposed to be a full service maintenance facility. The current proposal is to use the Midway Yard only for storage, inspection, and light maintenance. The LACMTA has determined that this site is of sufficient size and shape for these purposes.

Comment 2.2.2.15-2:

"...MTA has decided...the yard...requires a secondary fire road that will cost \$millions to build. Add to that that this fire road will both take park land with no compensation offered and permanently scar an Elysian Park hillside--all for a temporary facility..."

"It would be a much better solution to realign the road down the natural draw which is what the Department of Water and Power (DWP) pump station road follows. When DWP completes construction of its new chlorination station, it will have no need for the old pump station building, and MTA could continue the road down into the yard through that site. This scenario would both save the hill and trees from destruction, as well as eliminate huge and unsightly retaining walls. Assuredly, it would also cost a fraction of the currently proposed overly engineered road."

Response 2.2.2.15-2:

The LACMTA has determined that the proposed road alignment is the most cost effective that meets both local fire access requirements and existing site constraints. As part of its planning design process, the LACMTA examined a variety of roadway alignments into Midway Yard, including extending the current road through the LADWP pump station as recommended by the Citizens Committee to Save Elysian Park (CCSEP). However, such an alignment is not feasible for several reasons. First, there is not enough room for a fire truck to turn north after reaching the bottom of the hill (called "touching down") due to the location of the railroad tracks. Second, the fire department requires two access points to the site, and a southern alignment would be considered an extension of Buena Vista Drive to the southeast. Third, the road must touch down to the north to directly serve the northern end of the planned yard building. Finally, the pump station contains a large foundation structure that is in the process of being removed but, at present, it would prevent extension of the existing pump station road. Although a southern alignment might cost less than a northern alignment, and would not impact the neighboring hillside, it did not meet engineering or fire access requirements and was therefore eliminated.

The proposed roadway and yard complex will be permanent LACMTA facilities. The roadway, as proposed, impacts a very small, isolated portion of the park (i.e. less than 3 acres of inaccessible slopes) while most of the road, including almost all of the retaining wall(s), is on LACMTA property. The LACMTA will apply to the City Parks Department and other city departments for the appropriate approvals in this regard. Use of this property would therefore not be considered a "taking" of valuable or useful parkland, and is in fact an appropriate use of this area given its location and historical use.

It should be noted that this roadway will primarily impact a small isolated "shoulder" slope that extends east from the higher, more prominent north-south trending ridge that forms the eastern border of the park. This slope is not visible from other park property, and the road would only be visible from isolated portions of State Highway 110 (Pasadena Freeway), and from some taller industrial buildings across the Los Angeles River. For these reasons, the LACMTA maintains that this impact is not significant. The LACMTA will meet with the CCSEP to discuss roadway modifications that reduce the size of retaining walls, or to install retaining structures that can be planted to reduce visual impacts.

Comment 2.2.2.15-3:

"The proposed retaining walls for this road are not 0-36' as indicated on Figure 3.3-6. Current plans call for walls on both the upper and lower banks of the road totaling up to 50' in height for as long as 280 feet."

Response 2.2.2.15-3:

Figure 3.3-6 notes that the "upper" (up slope or western) retaining wall will vary in height from zero feet high at the northern end where the road "touches down", to 36 feet high at the southern end where there is the most grade/elevation difference. It may have been more clear to add a second note that the "lower" (down slope) wall would be zero to approximately 14 feet high. The original note on Figure 3.3-6 applied to each slope. The CCSEP is correct that the cumulative height of the slope may exceed 50 feet, while the LACMTA note is correct in referring to the height of each individual slope.

Comment 2.2.2.15-4:

"...the road as planned would destroy a hilly knob in Elysian Park replete with mature trees. To state that 'No Impacts. . .will be significant. Therefore mitigation measures are not required.' (4.7.5.4) is ludicrous."

Response 2.2.2.15-4:

The proposed roadway will excavate a small portion of east-facing hillside not visible from the park, but it will not remove the hilly knob located further to the west that separates this slope from the developed park property to the west. The LACMTA maintains that this impact is not considered significant, but is willing to meet with representatives of CCSEP and the City Parks Department to consider a road design more sensitive to the natural contours and vegetation (see Response 2.2.2.15-2).

As stated by the CCSEP, construction of the proposed road may cause the removal of several (less than five) oak trees. While this potential impact is not considered significant, the LACMTA proposes to add the following measure to the mitigation monitoring plan:

"The LACMTA will provide replacement trees of similar species at a 2:1 ratio for trees removed by construction of the access road into Midway Yard. The type and location of replacement trees will be coordinated with the CCSEP and the City Parks Department."

Comment 2.2.2.15-5:

"...taking park land is illegal per City Charter unless the taking agency bequeaths equal or greater acreage in the area as replacement park land...there must be additional landscape

mitigation for such an expanse of retaining wall and the mature trees lost must be replaced with an equal or greater amount of mature trees."

Response 2.2.2.15-5:

For information on the proposed roadway impacts on parkland, see Response 2.2.2.15-2. For information on impacts to trees, see Response 2.2.2.15-4.

Comment 2.2.2.15-6:

"...CCSEP fully expects MTA to commit to constructing a bike path from Taylor Yard into Elysian Park as mitigation. Before recent work involving new tracks and bridges for both the maintenance facility and Metrolink, uninterrupted access in the form of a crude path existed along the Los Angeles River from Barclay Street (where the current approved bike path ends) to Elysian Park via the Midway Yard. Because of rugged topography, the Buena Vista area of the park above Midway Yard is the only logical point to connect Elysian Park to the river bikeway which it is hoped will eventually extend to Long Beach. As a transportation agency, LACMTA has a responsibility to preserve this access."

Response 2.2.2.15-6:

Not related to mitigation for this SEIR, or previous EIRs, LACMTA has been working with Councilwoman Gloria Molina's office and Councilman Mike Hernandez's office regarding bicycle path access in this area. It is the LACMTA's understanding that such a trail would enter the Midway Yard site at the northern end, then proceed up the slope on Elysian Park land. The City's Bureau of Engineering is now estimating the cost of constructing a bicycle bridge west of this proposed trail to make it continuous through the park.

At this point, the LACMTA has agreed to allow construction of a bicycle trail across the northern corner of its Midway Yard property, but does not consider itself responsible for constructing a long segment of trail planned on City park property. The LACMTA will continue to meet with City officials and others on this issue.

**2.2.2.16 Letter from Elizabeth J. Harris, Los Angeles Unified School District;
May 9, 1994**

Comment 2.2.2.16-1:

"The District's January 18, 1994 comments to the Notice of Preparation (NOP) asked that impacts of this project on students' safe pedestrian routes to school be considered in the SEIR. Not only did the SEIR not provide a plan of the proposed below-grade alignment at Marmion Way and Figueroa Street, it did not even mention that this alignment would involve closure of French Avenue to traffic, bicyclists, and pedestrians. We were not aware of this closure until yesterday when, in response to our request, we received the engineer drawings for the below-grade option. We noted that the station had been moved further to the north than was

indicated in the previous EIR, so that it partially blocked the intersection at French Avenue. We were told by Metropolitan Transportation Authority (MTA) staff that they recently determined that French Avenue would be closed.

"The importance of keeping French Avenue open for students is an issue which we addressed in our comments to the previous SEIR. The Final EIR of January 1993, in the Response to Comments section, stated that French Avenue will remain open. This is important because this route is used by a large number of students who attend Loreto School, as well as by students of other schools in the area. Loreto School in particular has perhaps 100 students who live on the east side of Figueroa Street and the tracks; many of these students walk or bicycle to school via French Avenue which is the most convenient and safest route. A crossing at Avenue 37, to the north of French Avenue, is not a good alternative. Nor is the pedestrian bridge over the Pasadena Freeway, just south of Loreto Street School, a good alternative pedestrian route because it is not considered safe by many in the community. It is imperative that the MTA maintain the crossings to vehicular, pedestrian and bicycle traffic at French Avenue.

"Please describe in detail the route that will be available over French Avenue to pedestrians, bicyclists, and vehicles.

"We have also been advised by MTA staff that it is possible that during construction, both French Avenue and Avenue 37 might be closed to vehicular, bicycle, and pedestrian traffic. If this should be the case, we ask that the MTA provide a shuttle bus to take students to and from school."

Response 2.2.2.16-1:

The Notice of Preparation for the SEIR indicated there would be no significant impacts to schools as a result of the proposed project. The LACMTA has reviewed this finding and still concurs that no significant adverse impacts are expected to school services from the project. As stated by the school district, French Avenue is regularly used as an at-grade railroad crossing by vehicles, bicycles, and pedestrians traveling to and from several local schools. The rail line recently experienced little rail traffic, and presently experiences no rail traffic, so access across the tracks at French Avenue is unimpeded by rail traffic. However, if this crossing were to be maintained after the proposed light rail project was implemented, significant safety impacts would occur.

The closing of French Avenue was proposed as part of this project as a result of physical restraints of the below-grade separation, and after in-depth examination of local vehicular and pedestrian circulation patterns, including "safe routes to schools" as maintained by the LADOT and the Los Angeles Unified School District (LAUSD). The French Avenue Station will be designed to preclude crossings of the tracks at this point to maintain safe emergency exit routes from the station, and to prevent potential conflicts between light rail vehicles and pedestrians.

This potential street closure was most recently examined in the "Traffic And Transportation Task 10 Report" prepared for the RCC in May of 1993. That report projected that roadway levels of service would be substantially improved as a result of the station and associated road improvements. The single most important improvement of this project, in terms of vehicular, bicycle, and pedestrian circulation is a grade-separated crossing at Avenue 37, just east of French Avenue. This plan would incrementally increase travel times (less than five minutes) for some pedestrians and bicyclists traveling to and from local schools. However, it would significantly improve local pedestrian and bicycle safety compared to maintaining an at-grade crossing at French Avenue given the increase in local train traffic. According to LAUSD's boundary map provided, only a few students would be impacted by French Avenue closure. The LACMTA therefore disagrees with the district's assertion that "...a crossing at Avenue 37...is not a good alternative" and that "French Avenue is the most convenient and safest route." While French Avenue may be more convenient and safe at the present because there is no train traffic, the LACMTA maintains that the improved safety of the new crossing is worth the trade off of a few minutes of convenience from the old crossing.

The LACMTA also examined a crossing at the Pasadena Freeway and constructing a pedestrian overcrossing at French Avenue. However, these were considered less safe and cost effective than the new proposed crossing at Avenue 37.

The new route for students traveling to and from local LAUSD schools would be to divert approximately 500 feet east of French Avenue to Avenue 37. While the present walking route may be shorter, the LAUSD is aware that the shortest route may not always be the safest route. The LACMTA believes this new route will improve overall safety for students traveling to and from local schools. Local "Safe Route to School" maps should be revised by LADOT the summer prior to implementation of the street closures with a note as to the changed routes.

Closure of both French Avenue and Avenue 37 would create serious access problems during construction for local LAUSD students. Therefore, the LACMTA will include the following measure in the mitigation monitoring plan to assure that simultaneous closure of French Avenue and Avenue 37 does not occur:

"The LACMTA will plan and implement construction of the French Avenue Station and Marmion Way/Figueroa Street grade separation so that French Avenue and Avenue 37 are not closed at the same time. The Construction Manager of this project will discuss the construction schedule regularly with school and district officials, and notify them at least 48 hours in advance of foreseeable schedule changes regarding these two locations."

Comment 2.2.2.16-2:

"Despite our request in our letter of January 18, 1994, there is nothing in the DEIR to address the impacts that the project will have on students' safe pedestrian routes to school. The concerns of the District's Student Traffic and Safety Education Section are therefore resubmitted, and we ask that you address them in the Response to Comments Section of the Final SEIR."

Response 2.2.2.16-2:

The proposed closure of French Avenue and the planned improvements at Avenue 37 (including a grade-separated crossing) will improve pedestrian safety for LAUSD students walking or riding bicycles to and from school. They will also improve vehicular safety due to the potential conflicts of local traffic at French Avenue and the increased number of trains utilizing these tracks as a result of the project. For additional discussion of this issue, see Response 2.2.2.16-1 and the responses to comments by the LAUSD Student & Traffic Safety Education Section (Section 2.2.2.17).

Comment 2.2.216-3:

"Please provide a mitigation measure to ensure that the very successful 'School Safety Program' will continue to be provided to schools which are impacted by the Marmion Way street closures and light rail construction and operation."

Response 2.2.2.16-3:

The LACMTA has added the following measure to the mitigation monitoring plan to help reduce potential vehicular, bicycle, and pedestrian safety concerns:

"LACMTA will sponsor the 'School Safety Program' at LAUSD schools affected by the street closures at French Avenue and the Marmion Way area. This program will be offered by the LACMTA's Public Affairs Office during construction and pre-operation phases of the project."

Comment 2.2.2.16-4:

"It is particularly important that a mitigation measure be added to ensure that school principals be provided adequate notice of street closures and of construction that may interfere with the established student pedestrian routes."

Response 2.2.2.16-4:

The LACMTA proposes the following measure be added to the mitigation monitoring plan to help coordinate street closures and construction activities:

"LACMTA's Construction Manager will regularly review construction schedules and planned street closures with school and LAUSD personnel. The Construction Manager will contact officials at least 48 hours prior to any planned activity that could impede local vehicle, bicycle, or pedestrian circulation."

Comment 2.2.2.16-5:

"In regards to our response to the NOP that impacts on Arroyo Seco School be further analyzed, we have been advised by MTA staff that the SEIR did not analyze these impacts because the project description did not include changes made in the area of the Arroyo Seco School; the alignment segments weren't re-analyzed there because there were no street closures, nor was there a need to reduce the height of the soundwall because there were no visual obstructions to train operators, pedestrians, or motorists in these areas.

"Are we therefore correct in understanding that the January 1993 Final EIR, together with the mitigation measures described therein and incorporated into the Mitigation Monitoring Program, is valid as it pertains to the Light Rail project in the vicinity of Arroyo Seco School? In particular, do the noise mitigation measures which were added to the Final EIR in January 1993 remain unchanged?"

Response 2.2.2.16-5:

The commentor is correct; all previously approved mitigation measures will be enforced unless supplanted or modified by measures in this SEIR's Mitigation Monitoring Plan. Please see Section 4.3.8.5 for documentation listing the improvements that are proposed near Arroyo Seco Alternative Magnet School.

Comment 2.2.2.16-6:

"Please provide a plan of the construction staging areas, and the extent of the construction in relation to Loreto School, and Hillside School. Please identify the haul routes, and the frequency of the haul trucks. We understand the construction phase may last for seventeen months. If these trucks pass schools, please either quantify the noise and air impacts, or provide a mitigation measure that these trucks will not pass by schools during school hours."

Response 2.2.2.16-6:

A plan of construction staging areas for the project is not available yet, but will be available in the "Worksite Traffic Control Plan" required by City of Los Angeles' Department of Transportation (LADOT). These plans will be made available to affected local schools and LAUSD officials at least 30 days before the start of construction. The excavation/hauling phase of construction is expected to last 8.5 months.

Haul routes will depend on the final locations of work storage and stockpiling areas, which are not available as yet. However, local haul routes have already been designated by the City and are generally oriented away from sensitive land uses such as schools.

**2.2.2.17 Attachment from School Traffic and Safety Education Section;
November 24, 1993**

Comment 2.2.2.17-1:

"Closure of Avenues 51, 53, 55, and 61 (south of Figueroa Street) across the railroad right-of-way appear to impact the integrity of the current Pedestrian Routes Map for students attending the following schools: Aldama School (Avenue 51); Monte Vista School (Avenue 53); Monte Vista School (Avenue 55); and Garvanza School (Avenue 61). A study must be made to identify alternate safe and convenient pedestrian routes. DOT will need to revise current map to reflect any changes."

Response 2.2.2.17-1:

Pedestrian Route Maps for these schools will have to be changed, however, these changes are not necessarily considered significant or even adverse. Various street improvements are planned, and pedestrian access will be maintained within the area which will actually improve overall pedestrian safety. This is especially true considering the planned increase in the number of trains that will utilize this corridor daily. Changing pedestrian routes to schools does not necessarily require a specific study; these maps are subject to periodic revision as a result of new development or street changes not associated with rail projects. With respect to Garvanza School, it is not located near the rail alignment and its access will not be impacted as a result of the proposed street closures.

Comment 2.2.2.17-2:

"It is imperative that METRO provide at no charge to the school district an instructional rail safety program and materials to all affected elementary and middle schools."

Response 2.2.2.17-2:

As outlined in Response 2.2.2.16-3 of the letter from Elizabeth J. Harris (Los Angeles Unified School District) above, the LACMTA sponsors the "School Safety Program" at LAUSD schools. This program will be offered by the LACMTA's Public Affairs Office during construction and pre-operation phases of the project.

Comment 2.2.2.17-3:

"School Transportation must be contacted regarding the potential impact, if any, upon existing school bus routes."

Response 2.2.2.17-3:

The LACMTA has added the following measure to the mitigation monitoring plan to help coordinate its activities with LAUSD bus routes and operation:

"LACMTA's Construction Manager will regularly review construction schedules and planned street closures with LAUSD School Transportation personnel. The Construction Manager will contact officials at least 48 hours prior to any planned activity that could impede local bus circulation."

Comment 2.2.2.17-4:

"Contractors must guarantee that safe and convenient school pedestrian routes are maintained. Contractors must maintain ongoing communication with administrators at impacted school sites providing sufficient notice to forewarn children and parents when currently existing school pedestrian routes will be impacted."

Response 2.2.2.17-4:

The LACMTA has proposed measures to coordinate its activities with local school, district, and transportation personnel (see Responses 2.2.2.16-3 and -4 of the letter from Elizabeth J. Harris, Los Angeles Unified School District) for details of these additional mitigation measures. [Also see Mitigation Monitoring Plan prepared for this SEIR (May 1994).]

Comment 2.2.2.17-5:

"Appropriate traffic controls (signs and signals) including automatic crossing gates and warning signals, must be installed as needed to ensure pedestrian and vehicular safety."

Response 2.2.2.17-5:

The LACMTA will install such controls according to federal, state, and its own safety guidelines, as appropriate, to ensure vehicular and pedestrian safety. LACMTA's commitment to do so is included throughout the DSEIR, incorporated herein by reference.

Comment 2.2.2.17-6:

"Construction scheduling should be sequenced to minimize conflicts with pedestrians, school buses and cars."

Response 2.2.2.17-6:

In addition to coordinating street closures and other project activity with local schools and LAUSD personnel, the LACMTA will schedule and carry out construction to minimize such

conflicts to the greatest degree practical. The measures outlined above in 2.2.2.16-1, -3, and -4 will help minimize potential conflicts.

Comment 2.2.2.17-7:

"Funding for crossing guards to be provided when safety of children compromised by construction related activities at impacted crossings.

"Funding for a flag person to be provided as needed where construction related activities compromise the safety of pedestrians and/or motorists while traveling to and from school."

Response 2.2.2.17-7:

The LACMTA proposes the following measure be added to the mitigation monitoring plan to help coordinate its activities with LAUSD bus routes and operation:

"LACMTA's Construction Manager will ensure that safe crossings and/or personnel are provided to help school children cross streets or construction areas where needed. Such arrangements will be coordinated with local school and LAUSD officials."

Comment 2.2.2.17-8:

"Pedestrian right-of-way near rail line must be clearly marked to minimize trespassing, vandalism, and short-out attractions...Barriers must be constructed as needed to minimize trespassing, vandalism, and short-out attractions...Fencing should be installed to secure construction equipment to minimize trespassing, vandalism and short-out attractions."

Response 2.2.2.17-8:

Pedestrian access points along LACMTA rights of way will be clearly marked. LACMTA facilities and equipment are designed to minimize or resist vandalism. Barriers and other structures will be used to limit access to the LACMTA rights-of-way to prevent trespassing and attracting short-outs.

Comment 2.2.2.17-9:

"Security patrols should be funded and provided to minimize trespassing and short-out attractions."

Response 2.2.2.17-9:

The LACMTA maintains its own security force. Along LACMTA rights-of-way and LACMTA stations, it is the security personnel's primary function to minimize trespassing (including short-out attractions).

**2.2.2.18 Memorandum from Janice Sawyer, Los Angeles Unified School District
Environmental Health and Safety Branch; May 2, 1994**

Comment 2.2.2.18-1:

"It is staff's recommendation that the level of lead in the soil should be determined by testing the soil at the site. The level of lead in the soil should be determined by testing the soil at the site. The level of lead in the soil should be determined by testing the soil at the site."

less than 8.8 ppm, in spite of variability in anticipated traffic. Therefore, it is unlikely that the 9.0 ppm would be exceeded and the facility is not in danger of violating California state standards.

Comment 2.2.2.19-3:

"...Your description of the proposed station on page 4-19 does not agree with a proposed parking site plan (attached) that I obtained this week from the City of Pasadena which was not a part of this SEIR. Further, the parking site plan included property at the corner of Halstead and Foothill that is not a part of the Johnson & Johnson facility...Consideration should be given to reconfiguration of the site to accommodate 1,000 vehicles."

Response 2.2.2.19-3:

Please see Section 2.3 for a revised drawing of the Johnson & Johnson/Merck alternate Park and Ride facility. The drawing indicates that the entire property, except for the Southern California Edison Company substation, would be taken for the Park and Ride facility, which would accommodate 1,000 vehicles. (Also see Sections 2.2.2.3 through 2.2.2.7 for responses from the City of Pasadena's comments on the Park and Ride facility.)

2.2.2.20 Letter from Susan Mossman, Pasadena Heritage; May 7, 1994

Comment 2.2.2.20-1:

"Table 2.2-1
The Johnson & Johnson/Merck facility has been determined by the City of Pasadena Cultural Heritage Commission to meet the criteria for an "Historic Treasure," the highest landmark designation in the City of Pasadena. Two landmark nominations (City and National Register of Historic Places) are pending, as stated in the document.

The loss of this building is recognized in the document as a significant negative impact with mitigation required. Documentation of the building is not acceptable mitigation under CEQA.

Section 2.4

The demolition of the Johnson & Johnson/Merck building is a controversial issue and needs to be resolved...

Section 4.10.3

The statement is made that "If the Johnson and Johnson/Merck site is selected...all of the buildings and structures would be subject to demolition. Demolition of any structure at the site for listing in the National Register of Historic Places would result in a significant negative impact on a cultural resource." The DSEIR recognizes that the building is a significant cultural resource and needs to be protected and preserved in the National Register."

Response 2.2.2.20-1:

For information on the Johnson/Merck facility lease, see various responses to comments from the City of Pasadena in Sections 2.2.2.3 through 2.2.2.7.

Comment 2.2.2.20-2:

"Section 4.10.1

The description of the site and its significance is adequate. Please note that on page 4-90, second line, Pasadena Heritage is the complete name of the organization (a private non-profit organization). The word "commission" should be deleted."

Response 2.2.2.20-2:

Comment noted. The word "commission is not applicable.

Comment 2.2.2.20-3:

"Alternatives to demolition which would mitigate this significant adverse impact should be presented as part of this document. (While recordation may be part of the process, it is not mitigation and does not reduce the negative impact to zero.)

Alternatives should include, but not be limited to:

Developing a reuse alternative for the historic building which could meet needs of the agency and using the rest of the site as the Park and Ride facility.

Using that portion of the site which is vacant or currently has nonsignificant buildings for the Park and Ride facility and leasing the building.

Entering into a joint development agreement with another agency or private party to reuse the building and construct the parking jointly.

Seeking a subdivision of the property and purchasing the southern portion of the property only."

Response 2.2.2.20-3:

See response 2.2.2.19-1, above.

Comment 2.2.2.20-4:

"What changes in circulation plans would be indicated if the building were preserved or reused? What would the relative costs and savings be for each alternative?"

Response 2.2.2.20-4:

See Response 2.2.2.19-1, above.

Comment 2.2.2.20-5:

"With regard to the 106 process, how is the treatment of historic properties addressed in the Memorandum of Agreement, Programmatic Agreement or Memorandum of Understanding signed by the MTA, ACHP and FHA and the SHPO?"

Response 2.2.2.20-5:

LACMTA will pursue the appropriate agency agreements during the project design phase, including consultation with the City of Pasadena regarding the structures at the Johnson & Johnson/Merck site.

Comment 2.2.2.20-6:

"If there are interested parties concerned with the preservation of the cultural resources, must not consideration be given to the preservation of the significant structure? "

Response 2.2.2.20-6:

Please see various responses to comments from the City of Pasadena, Sections 2.2.2.3 through 2.2.2.7.

2.2.2.21 Transmittal from John W. Caldwell, John Caldwell Design; April 12, 1994

Comment 2.2.2.21-1:

"My concern is parking. The last few years parking availability on El Centro has diminished; now, it is almost non-existent. Therefore, the Park and Ride locations that are being considered in the area are a must...I have suggested to Bill Campbell of the South Pasadena Planning Department and now to your office, that there be no parking between 6:00 A.M. and 9 A.M. Monday through Friday in the area surrounding the Light Rail station."

Response 2.2.2.21-1:

The project modifications addressed in this SEIR did not include LRT parking for South Pasadena. Traffic and parking for South Pasadena was addressed in the Final EIR for the project (LACTC, 1990). The public comment period for the Final EIR was closed in 1990, according to California Environmental Quality Act (CEQA) Guidelines. Nonetheless, your comment has been noted.

2.2.2.22 Letter from George W. Sabin, April 21, 1994

Comment 2.2.2.22-1:

"Please do not consider the new Orchard Hardware Supply property located at 3425 E. Colorado Blvd. in East Pasadena for the proposed light rail trolley stop...Why were they permitted to spend large sums preparing the site for the new store if this was in your plans? Johnson/Merck on E. Foothill has been vacant for a long time and Kodak Datatape is also available."

Response 2.2.2.22-1:

Your comment has been noted. The property presently occupied by Orchard Hardware Supply is being considered as an alternative location for the Sierra Madre Villa Park and Ride facility when the property was occupied by Builders Emporium. Builders Emporium and the City of Pasadena were aware of LACMTA's intentions to include the site in its Park and Ride analysis. Other sites that were suitable for the Park and Ride facility were also analyzed, including the Johnson & Johnson/Merck site, as suggested in your comment.

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2.3 CORRECTIONS AND ADDITIONS

2.3.1 Air Quality

Figures 4.2-1 and 4.2-2 (pages 4-7 and 4-8) are incorrectly labeled. The figure titles should be reversed to match the correct figures.

2.3.2 Marmion Way/Figueroa Street Below-Grade Separation

The below-grade site plan proposed for construction in the vicinity of Marmion Way and Figueroa Street is presented on Figure 2-1.

2.3.3 Marmion Way Property Acquisitions

The DSEIR identified the need for approximately 50 curb cuts and 6 full parcel takes along the Marmion Way corridor in Highland Park. Ten buildings located on the 6 parcel takes would be demolished. It may become necessary to add or delete structures proposed for demolition as the project progresses toward completion. Proper CEQA documentation and analysis would be completed should candidate buildings be determined to be of historic or other significance. LACMTA will communicate with local officials regarding changes to parcel takes.

2.3.4 Sierra Madre Villa (Pasadena) Park and Ride Facility Alternatives

The revised drawing for the Johnson & Johnson/Merck Park and Ride alternative for the Sierra Madre Villa Station in east Pasadena is presented on Figure 2-2.

2.3.5 Arroyo Seco Bridge Archaeological Inventory

Subsequent to the distribution of the DSEIR for public/agency review, the records search for the Arroyo Seco Bridge was received from the Archaeological Information Center, UCLA Institute of Archaeology. The results of the records search, including a site defined as approximately one-half mile in radius around the bridge, are:

- No historic or prehistoric sites have been identified within the site;
- The National Register of Historic Places and the California State Historic Resources Inventory list no properties within the site; and
- The California Historical Landmarks (1990) of the Office of Historic Preservation, California Department of Parks and Recreation, indicate that there are no California Historical Landmarks within the site.

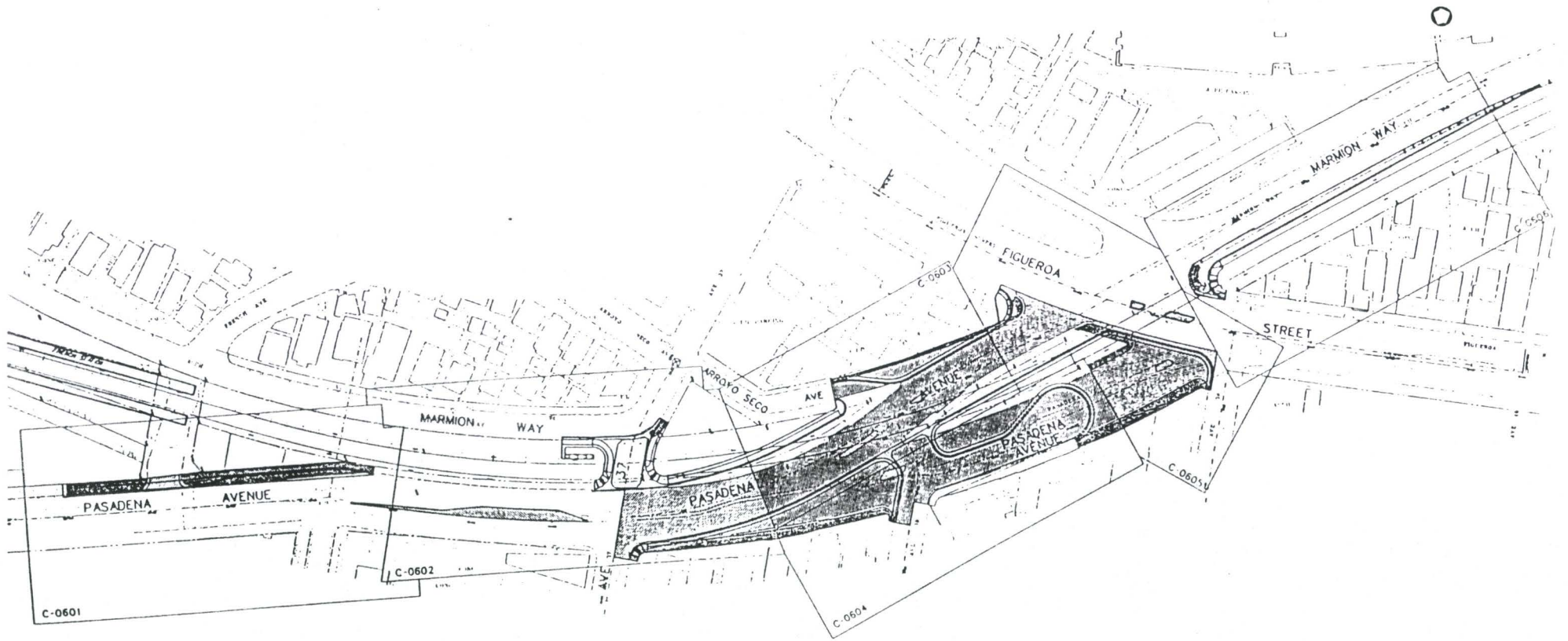


FIGURE 2-1 MARMION WAY/FIGUEROA STREET BELOW-GRADE SEPARATION

2.3.6 French Avenue Crossing

The alternative to construct a below-grade separation at Marmion Way and Figueroa Street has necessitated the closure of French Avenue to pedestrian and vehicular traffic. A pedestrian crossing will be provided for at Avenue 37.

2.3.7 Acquisition of Two Parcels

Two additional parcels, PA-209 and -210, are proposed for acquisition. They are located on the west side of Halstead Street at Foothill Boulevard (Figure 2-3). In order to reduce traffic impacts along Halstead Street, it is proposed that Halstead Street be widened south of Foothill Boulevard. It would be necessary to demolish the buildings on parcels PA-209 and -210 to accommodate the street widening. The properties would also be used as part of the alternative Johnson & Johnson/Merck Park and Ride site. The businesses occupying the buildings on the two parcels would need to be relocated, but the action will not result in significant impacts to the community.

2.3.8 Supporting Documentation

Documentation in support of the DSEIR (LACMTA, 1994b) is presented on the following pages. A list of the documentation is as follows:

- Air Quality Calculations
- MTA Systemwide Criteria, Section 2.8.9, Construction Noise and Vibration Control
- Evaluation of Change in Noise Impacts, Proposed Blue Line Wayside Horn System
- Changes to Transportation/Circulation Section
- LRT Improvements Near Arroyo Seco Alternative Magnet School, LAUSD

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2.3.8.1 Air Quality Calculations

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REVISION 0, MARCH 25, 1994
PM₁₀ EMISSIONS FROM DEMOLITION OF
ALTERNATE PARK AND RIDE SITES

CALCULATION OF EMISSIONS

$$E = \frac{0.00042 \text{ lbs PM}_{10} / \text{ft}^3 \times V}{Q}$$

Where:

- E = PM₁₀ emissions in lb/day
- 0.0042 = emission factor for building demolition
- V = building volume (ft³)
- Q = number of days to demolish building(s)

JOHNSON & JOHNSON/MERCK SITE

| | | |
|------------|----------------------------------|-------------------------|
| Building 1 | 10,000 ft ² x 10 ft = | 100,000 ft ³ |
| Building 2 | 10,000 ft ² x 20 ft = | 200,000 ft ³ |
| Building 3 | 13,500 ft ² x 10 ft = | 135,000 ft ³ |
| Building 5 | 30,000 ft ² x 10 ft = | 300,000 ft ³ |
| Building 6 | 30,000 ft ² x 10 ft = | 300,000 ft ³ |
| Building 7 | 25,000 ft ² x 20 ft = | 500,000 ft ³ |
| Building 8 | 6,800 ft ² x 20 ft = | 68,000 ft ³ |

TOTAL = 1,603,000 ft³

$$\frac{0.00042 \times 1,603,000 \text{ ft}^3}{10} = 67.32 \text{ lb/day}$$

BUILDERS EMPORIUM SITE

$$287 \text{ ft} \times 155 \text{ ft} \times 20 \text{ ft} = 889,700 \text{ ft}^3$$

$$\frac{0.00042 \times 889,700}{5} = 74.73 \text{ lbs/day}$$

REVISION 1, MAY 9, 1994
 PM₁₀ EMISSIONS FROM DEMOLITION
 OF ALTERNATE PARK AND RIDE SITES

CALCULATION OF EMISSIONS

$$E = \frac{0.00042 \text{ lbs PM}_{10} / \text{ft}^3 \times V}{Q}$$

Where:

- E = PM₁₀ emissions in lb/day
- 0.0042 = Emission factor for building demolition
- V = Building volume (ft³)
- Q = Number of days to demolish building(s)

JOHNSON & JOHNSON/MERCK SITE

| | | |
|--------------------|----------------------------------|-------------------------------|
| Building 1 | 10,000 ft ² x 10 ft = | 100,000 ft ³ |
| Building 2 | 10,000 ft ² x 20 ft = | 200,000 ft ³ |
| Building 3 | 13,500 ft ² x 10 ft = | 135,000 ft ³ |
| Building 4 | 46,350 ft ² x 20 ft = | 871,200 ft ³ |
| Building 5 | 30,000 ft ² x 10 ft = | 300,000 ft ³ |
| Building 6 | 30,000 ft ² x 10 ft = | 300,000 ft ³ |
| Building 7 | 25,000 ft ² x 20 ft = | 500,000 ft ³ |
| Building 8 | 6,800 ft ² x 10 ft = | 68,000 ft ³ |
| Misc. Office Space | 11,000 ft ² x 10 ft = | 110,000 ft ³ |
| Converse Envirolab | 11,000 ft ² x 10 ft = | <u>110,000 ft³</u> |
| | total | 2,694,200 ft ³ |

$$E = \frac{0.00042 \text{ lbs PM}_{10} / \text{ft}^3 \times V \text{ft}^3}{Q}$$

$$E = \frac{0.00042 \text{ lbs} \times 2,694,200}{13} = 87.04 \text{ lbs. of PM}_{10} \text{ per day}$$

BUILDERS EMPORIUM

No change

**PHASE 1
FUGITIVE DUST PM₁₀ CALCULATIONS
EARTH MOVING OR BULLDOZING OPERATIONS**

$$E = \frac{0.45 \times (G)^{1.5}}{(H)^{1.4}} \times I \times J$$

Where:

E = PM₁₀ emissions from earth moving (lb/day)

G = Silt content of aggregate (%) = 7.5

H = Moisture content of surface material (%) = 2.0

I = 2.2046 kg/hr/lb/hr

J = Hours of earth moving operations

$$E = \frac{0.45 \times (7.5)^{1.5}}{(2.0)^{1.4}} \times 2.2046 \times 5 = 38.61 \text{ lb/day}$$

$$\frac{38.61 \text{ lb/day} \times 22 \text{ days/mo} \times 3 \text{ mo/quarter}}{2000 \text{ lb/ton}} = 1.27 \text{ tons/quarter}$$

CALCULATIONS FOR PHASE 1 AIR EMISSIONS

| Equipment | Monthly Usage (hr) | No. of Pieces | Quarterly Usage | HP Rating | Units | Pollutant Emission Factors | | | | | Pollutant Emission Rates (lb/quarter) | | | | |
|-----------------|--------------------|---------------|-----------------|-----------|----------|----------------------------|-------|-------|-------|--------|---------------------------------------|---------------|-----------------|---------------|---------------|
| | | | | | | CO | ROC | NOx | SOx | PM10 | CO | ROC | NOx | SOx | PM10 |
| Bulldozer | 110 | 2 | 330 | - | lb hr | 0.346 | 0.148 | 1.260 | 0.137 | 0.112 | 228.36 | 97.68 | 831.60 | 90.42 | 73.92 |
| Wheeled Loader | 110 | 2 | 330 | - | lb hr | 0.572 | 0.291 | 1.890 | 0.182 | 0.172 | 377.52 | 192.06 | 1,247.40 | 120.12 | 113.52 |
| Backhoe | 110 | 2 | 330 | - | lb hr | 0.572 | 0.291 | 1.890 | 0.182 | 0.172 | 377.52 | 192.06 | 1,247.40 | 120.12 | 113.52 |
| Grader | 110 | 1 | 330 | - | lb hr | 0.151 | 0.039 | 0.713 | 0.086 | 0.061 | 49.83 | 12.87 | 235.29 | 28.38 | 20.13 |
| Compactor | 110 | 1 | 330 | 210 | lb hp-hr | 0.007 | 0.002 | 0.020 | 0.002 | 0.001 | 485.10 | 138.60 | 1,386.00 | 138.60 | 69.30 |
| Crane | 110 | 1 | 330 | 200 | lb hp-hr | 0.009 | 0.003 | 0.023 | 0.002 | 0.0015 | 594.00 | 198.00 | 1,518.00 | 132.00 | 99.00 |
| SUBTOTAL | | | | | | | | | | | 2,112.33 | 831.27 | 6,465.69 | 629.64 | 489.39 |

| Equipment | Monthly Usage (mi) | No. of Units | Quarterly Usage (mi) | Cold Starts/Quarter | Pollutant Running Emission Factors (lb/mi) | | | | | Cold Start Emission Factors lb/start | | | Pollutant Emission Rates (lb/quarter) | | | | |
|--|--------------------|--------------|----------------------|---------------------|--|-------|-------|--------|--------|--------------------------------------|-------|-------|---------------------------------------|---------------|-----------------|---------------|---------------|
| | | | | | CO | ROC | NOx | SOx | PM10 | CO | ROC | NOx | CO | ROC | NOx | SOx | PM10 |
| Dump Truck | 660 | 3 | 1,980 | 198 | 0.022 | 0.005 | 0.018 | 0.001 | 0.001 | 0.181 | 0.010 | 0.006 | 166.52 | 31.68 | 108.11 | 5.94 | 5.94 |
| Water Truck | 440 | 1 | 1,320 | 66 | 0.022 | 0.005 | 0.018 | 0.001 | 0.001 | 0.181 | 0.010 | 0.006 | 40.99 | 7.26 | 24.16 | 1.32 | 1.32 |
| SUBTOTAL | | | | | | | | | | | | | 207.51 | 38.94 | 132.27 | 7.26 | 7.26 |
| Total Direct Emissions from Construction Equipment Exhaust | | | | | | | | | | | | | 2,319.84 | 870.21 | 6,597.96 | 636.90 | 496.65 |
| Emission Rates, tons/quarter - lb/2000 lb/ton | | | | | | | | | | | | | 1.15 | 0.44 | 3.30 | 0.33 | 0.25 |
| Worker Vehicles | 880 | 30 | 26,400 | 1,980 | 0.008 | 0.006 | 0.001 | 0.0001 | 0.0002 | 0.160 | 0.010 | 0.006 | 950.99 | 67.32 | 91.08 | 7.92 | 15.84 |
| Emission Rates, tons/quarter - lb/2000 lb/ton | | | | | | | | | | | | | 0.48 | 0.03 | 0.05 | 0.00 | 0.00 |
| Delivery Trucks | 880 | 3 | 2,640 | 198 | 0.022 | 0.005 | 0.018 | 0.001 | 0.001 | 0.181 | 0.010 | 0.006 | 210.08 | 41.58 | 143.74 | 7.92 | 7.92 |
| Emission Rates, tons/quarter - lbs/2000 lb/ton | | | | | | | | | | | | | 0.11 | 0.02 | 0.07 | 0.00 | 0.00 |

- Notes:
- CO - Carbon monoxide.
 - HP or hp - Horse power.
 - hp-hr - Horse power - hour.
 - NOx - Nitrogen oxides.
 - PM10 - Particulate mater (10 microns in diameter or less).
 - ROC - Reactive organic carbon.
 - SOx - Sulfur oxides

PHASE 2
PM₁₀ EMISSION FROM AGGREGATE HANDLING

$$E = \frac{k(0.0032) (u/5)^{1.3}}{(m/2)^{1.4}}$$

Where:

E = Emission factor (lb/ton)

k = Particle size multiplier (0.35 for PM₁₀)

U = Mean wind speed (mph) = 3 mph

M = Material moisture content (%) = 2

$$E = \frac{(0.35)(0.0032) (3/5)^{1.3}}{(0.02/2)^{1.4}} = 0.36376 \text{ lb/ton}$$

Assume 1,613 ft³ of aggregate is handled each day (soil density = 115 lb/ft³):

$$1,613 \text{ ft}^3 \times 115 \text{ lb/ft}^3 = 185,495 \text{ lb of soil handled each day}$$

$$\frac{185,495 \text{ lb}}{2000 \text{ lb/ton}} \times 0.36376 = 33.74 \text{ lb of PM}_{10}/\text{day}$$

$$33.74 \text{ lb/day} \times 22 \text{ days/mo} \times 3 \text{ days/quarter} = 2,226.84 \text{ lb/quarter}$$

$$\frac{2,226.84 \text{ lb}}{2,000 \text{ lb/ton}} = 1.11 \text{ tons of PM}_{10} \text{ per quarter}$$

CALCULATIONS FOR PHASE 2 AIR EMISSIONS

| Equipment | Monthly Usage (hr) | No. of Pieces | Quarterly Usage | HP Rating | Units | Pollutant Emission Factors | | | | | Pollutant Emission Rates (lb/quarter) | | | | |
|--|--------------------|---------------|-----------------|-----------|----------|----------------------------|-------|-------|-------|--------|---------------------------------------|--------|----------|--------|--------|
| | | | | | | CO | ROC | NOx | SOx | PM10 | CO | ROC | NOx | SOx | PM10 |
| Bulldozer | 100 | 1 | 300 | - | lb/hr | 0.346 | 0.148 | 1.260 | 0.137 | 0.112 | 103.80 | 44.40 | 378.00 | 41.10 | 33.60 |
| Wheeled Loader | 100 | 1 | 300 | - | lb/hr | 0.476 | 0.291 | 1.890 | 0.182 | 0.172 | 142.80 | 87.30 | 567.00 | 54.60 | 51.60 |
| Grader | 100 | 1 | 300 | - | lb/hr | 0.151 | 0.039 | 0.713 | 0.086 | 0.061 | 45.30 | 11.70 | 213.90 | 25.80 | 18.30 |
| Compactor | 100 | 1 | 300 | 210 | lb hp-hr | 0.007 | 0.002 | 0.020 | 0.002 | 0.001 | 441.00 | 126.00 | 1,260.00 | 126.00 | 63.00 |
| Crane | 100 | 1 | 300 | 210 | lb hp-hr | 0.009 | 0.003 | 0.023 | 0.002 | 0.0016 | 567.00 | 189.00 | 1,449.00 | 126.00 | 100.80 |
| Concrete Pump | 100 | 3 | 300 | 100 | lb hp-hr | 0.020 | 0.003 | 0.024 | 0.002 | 0.0016 | 1,800.00 | 270.00 | 2,160.00 | 180.00 | 144.00 |
| Direct Pollutant Emissions, Construction Equipment | | | | | | | | | | | 3,099.90 | 728.40 | 6,027.90 | 553.50 | 411.30 |
| Tons/quarter (lbs/2000) | | | | | | | | | | | 1.55 | 0.36 | 3.02 | 0.28 | 0.21 |

| Equipment | Monthly Usage (mi) | No. of Units | Quarterly Usage (mi) | Cold Starts/Quarter | Pollutant Running Emission Factors | | | | | Cold Start Emission Factors | | | Pollutant Emission Rates (lb/quarter) | | | | |
|---|--------------------|--------------|----------------------|---------------------|------------------------------------|-------|-------|--------|--------|-----------------------------|-------|-------|---------------------------------------|-------|--------|------|------|
| | | | | | lb/mi | | | | | lb/start | | | CO | ROC | NOx | CO | ROC |
| | | | | | CO | ROC | NOx | SOx | PM10 | CO | ROC | NOx | | | | | |
| Worker Vehicles | 880 | 15 | 2,640 | 990 | 0.008 | 0.006 | 0.001 | 0.0001 | 0.0002 | 0.181 | | 0.006 | 495.99 | 33.66 | 45.54 | 3.96 | 7.92 |
| Emission Rates, tons/quarter (lb/2000) | | | | | | | | | | | | | 0.25 | 0.02 | 0.02 | 0.00 | 0.00 |
| Delivery Trucks | 293.30 | 10/day | 880 | 220 | 0.022 | 0.005 | 0.018 | 0.001 | 0.001 | 0.181 | 0.010 | 0.006 | 233.42 | 46.22 | 159.72 | 8.80 | 8.80 |
| Emission Rates, tons/quarter (lbs/2000) | | | | | | | | | | | | | 0.12 | 0.02 | 0.08 | 0.00 | 0.00 |

Notes:

- CO - Carbon monoxide.
- HP or hp - Horse power.
- hp-hr - Horse power - hour.
- NOx - Nitrogen oxides.
- PM10 - Particulate mater (10 microns in diameter or less).
- ROC - Reactive organic carbon.
- SOx - Sulfur oxides

2.3.8.2 MTA Systemwide Criteria, Section 2.8.9, Construction Noise and Vibration Control

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2.8.9 Construction Noise and Vibration Control**A. General**

Perform construction operations in a manner to minimize noise and vibration. Provide working machinery and equipment with efficient noise suppression devices and employ other noise and vibration abatement measures necessary for protection of both employees and the public. In addition, restrict working hours and schedule operations in a manner that will minimize to the greatest extent feasible the disturbance to the public in areas adjacent to the work and to occupants of buildings in the vicinity of the work. Protect employees and the public against noise exposure in accordance with the requirements of the Occupational Safety and Health Act of 1970 and the current statutory noise limits set by the Occupational Safety and Health Administration (Ref. 7). Compliance with the requirements of this Section will not relieve the Contractor from responsibility for compliance with the state and local ordinances, regulations, and other Sections of this criteria document.

B. Special Requirements

Compliance with the requirements of this Section will require the use of machines with effective mufflers or enclosures and selection of quieter alternative procedures. Compliance may also require the use of completely closed enclosures (tongue and groove plywood or sheathing) around work sites or a combination of closed boarding and effective mufflers or enclosures. It will also be necessary to arrange haul routes to minimize noise and vibration at residential sites and it may be necessary to place operating limitations on machines and trucks. Shop drawings of work sites and haul routes showing provisions for control of construction noise shall be submitted to the Engineer for approval.

C. Monitoring

Monitor noise and vibration levels of work operations to ensure compliance with the noise and vibration limitations contained herein and retain records of noise and vibration measurements for inspection by the Engineer. Promptly inform the Engineer of any complaints received from the public regarding noise and vibration. Describe the action proposed and the schedule for implementation, and subsequently inform the Engineer of the results of the action.

D. Definitions

Daytime/Nighttime. Daytime refers to the period from 7:00 a.m. to 7:00 .



p.m. local time daily except Sundays and legal holidays. Nighttime refers to all other times including all day Sunday and legal holidays.

Construction Limits. The right-of-way lines, construction easement boundary or property lines as indicated on the drawings.

Special Zones or Special Construction Sites. These may be designated outside of the construction site by the agency having jurisdiction where the construction site is located. These specially designated zones shall be treated by the contractor as if they were within the construction limits.

E. Noise Level Restrictions

Noise Level Restrictions in All Areas. In no case expose the public to construction noise levels exceeding 90 dBA (slow) or to impulsive noise levels with a peak sound pressure level exceeding 140 dB as measured on an impulse sound level meter or 125 dBC maximum transient level as measured on a general purpose sound level meter on "fast" meter response.

Noise Level Restrictions at Affected Structures. Conduct construction activities in such a manner that the noise levels 200 feet from the Construction Limits or at the nearest affected building, whichever is closer, do not exceed the levels listed Tables 2-13 and 2-14.

Continuous Noise. Prevent noises from stationary sources, parked mobile sources or any source or combination of sources producing repetitive or long-term noise lasting more than a few hours from exceeding the limits of Table 2-13.



TABLE 2-13
LIMITS FOR TOTAL CONSTRUCTION SITE NOISE

| <u>Affected Structure or Land Use</u> | <u>Maximum Allowable Continuous Noise Level, dBA</u> | |
|--|--|---------------------|
| | <u>Daytime</u> | <u>Nighttime</u> |
| <u>Residential</u> Single family residence not along a major arterial. | 60 | 50 |
| Land uses along an arterial or in multi-family residential areas, including hospitals | 65 | 55 |
| In commercial areas, including hotels | 70 | 60 |
| <u>Commercial</u> | | <u>At all Times</u> |
| In noise-sensitive semi-residential/commercial areas, including schools, libraries, churches, etc. | | 70 |
| In non-noise-sensitive commercial areas with no nighttime residency | | 75 |
| <u>Industrial</u> | | |
| All locations | | 80 |

Intermittent Noise. Prevent noises from non-stationary mobile equipment operated by a driver or from any source of intermittent, non-reoccurring on a long term basis, non-scheduled repetitive, short-term noises not lasting more than a few hours from exceeding the limits of Table 2-14.

TABLE 2-14
LIMITS FOR INTERMITTENT CONSTRUCTION NOISE

| <u>Affected Structure or Land Use</u> | <u>Maximum Allowable Intermittent Noise Level, dBA</u> | |
|--|--|------------------|
| | <u>Daytime</u> | <u>Nighttime</u> |
| <u>Residential</u> Single family residence not along a major arterial | 75 | 60 |



| | | |
|--|----|---------------------|
| Land uses along an arterial or in multi-family residential areas, including hospitals | 80 | 65 |
| In commercial areas, including hotels | 85 | 70 |
| <u>Commercial</u> | | <u>At all Times</u> |
| In noise-sensitive semi-residential/commercial areas, including schools, libraries, churches, etc. | | 85 |
| In non-noise-sensitive commercial areas with no nighttime residency | | 85 |
| <u>Industrial</u> | | |
| All locations | | 90 |

Special Zone or Special Construction Site. In areas outside of Construction Limits which have been determined to be outside of noise sensitive areas, but for which the Contractor has obtained designation as a special zone or special construction site from the agency having jurisdiction, the noise limitations for buildings in industrial areas apply.

In zones designated by the local agency having jurisdiction as a special zone or special premise or special facilities, such as hospital zones or areas with libraries, schools, etc., the noise level and working time restrictions imposed by the agency shall apply. These zones and work hour restrictions shall be obtained by the Contractor from the local agency.

More Than One Limit Applicable. Where more than one noise limit is applicable, use the more restrictive requirement for determining compliance.

F. Noise Emission Restrictions

Use only construction equipment meeting the noise emission limits listed in Table 2-15, as measured at a distance of 50 feet from the equipment in substantial conformity with the provisions of the latest revisions of SAE J366b, SAE J88, and SAE J952b (Refs. 8, 9, 10) or in accordance with the measurement procedures specified herein.



TABLE 2-15
NOISE EMISSION LIMITS ON CONSTRUCTION NOISE

| <u>TYPE OF EQUIPMENT</u> | <u>MAXIMUM NOISE LIMIT</u> | |
|---|--------------------------------|-----------------------------|
| | <u>Date Equipment Acquired</u> | |
| | <u>Before 1-1-1986</u> | <u>On or After 1-1-1986</u> |
| All equipment other than highway trucks; including hand tools and heavy equipment | 90 dBA | 85 dBA |
| | <u>Date Equipment Acquired</u> | |
| | <u>Before 1-1-1988</u> | <u>On or After 1-1-1988</u> |
| Highway trucks in any operating mode or location | 83 dBA | 80 dBA |

Peak levels due to impact pile drivers may exceed the above noise emission limits by 10 dBA.

G. Vibration Level Restrictions

Vibration Limits in All Areas. Construction activities shall be conducted so that vibration levels at a distance of 200 feet from the construction limits or at the nearest affected building (whichever is closer) do not exceed the following root-mean-square (rms) unweighted vibration velocity levels in any direction over the frequency range of 1 to 100 Hz:

| <u>Vibration Type and Permissible Aggregate Duration</u> | <u>Limit</u> |
|--|--|
| Sustained (≥ 1 hr/day) | 0.01 in/sec (80 dB re 10^{-6} in/sec) |
| Transient (<1 hr/day) | 0.03 in/sec (90 dB re 10^{-6} in/sec) |
| Transient (<10 min/day) | 0.10 in/sec (100 dB re 10^{-6} in/sec) |

Special Zones. In zones designated by the local agency having .



jurisdiction as a special zone or special premise or special facilities such as hospital zones, or areas with libraries, schools, etc., the vibration level and working time restrictions imposed by the agency shall apply. These zones and work hour restrictions shall be obtained by the Contractor from the local agency.

H. Noise and Vibration Control Requirements

Notwithstanding the specific noise and vibration level limitations specified herein, utilize the noise and vibration control measures listed below to minimize to the greatest extent feasible the noise and vibration levels in all areas outside the Construction Limits.

- Utilize shields, impervious fences or other physical sound barriers to inhibit transmission of noise.
- Utilize sound-retardant housings or enclosures around noise-producing equipment.
- Utilize effective intake and exhaust mufflers on internal combustion engines and compressors.
- Line or cover hoppers, storage bins and chutes with sound deadening material.
- Minimize the use of air- or gasoline-driven saws.
- Conduct truck loading, unloading and hauling operations so that noise and vibration is kept to a minimum.
- Route construction equipment and vehicles carrying spoil, concrete or other materials over streets and routes that will cause the least disturbance to residents in the vicinity of the work. Advise the Engineer in writing of the proposed haul routes prior to securing a permit from the local government.
- Site stationary equipment to minimize noise and vibration impact on the community, subject to approval of the Engineer.
- Use vibratory pile drivers or augering for setting piles in lieu of impact pile drivers. If impact pile drivers must be used, their use is restricted to the hours from 8:00 a.m. to 5:00 p.m. weekdays in residential and in semi-residential/commercial areas.



2.3.8.3 Evaluation of Change in Noise Impacts, Proposed Blue Line Wayside Horn System

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**Evaluation of Change
in Noise Impacts,
Proposed Blue Line
Wayside Horn System**

HMMH Report Number 292940-1

April 6, 1994

HARRIS MILLER MILLER & HANSON INC.

Consultants in Noise and Vibration Control

TECHNICAL MEMORANDUM

TO: Linda Meadow, Rail Construction Corporation
Jim Curry, Engineering Management Consultant

FROM: Hugh Saurenman
Harris Miller Miller & Hanson Inc.

DATE: April 6, 1994

SUBJECT: Evaluation of Change in Noise Impacts, Blue Line Wayside Horn System

HMMH Job No. 292940.01

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Noise Impacts, Blue Line Wayside Horn System
April 6, 1994

1

1. INTRODUCTION/SUMMARY

This memorandum summarizes our review and analysis of using wayside horns at grade crossings to replace the normal train mounted horns for warning pedestrians and motorists of approaching trains. The goal of the wayside horn system is to reduce noise impacts for communities near grade crossings without compromising motorist or pedestrian safety. Section 2 summarizes some of the literature that we reviewed and Section 3 is a preliminary noise impact analysis for wayside horns compared to normal train mounted horns. Section 4 lists some of our preliminary recommendations for the wayside horn system and gives a list of the issues and unresolved questions that will be considered in testing of the prototype wayside horn system.

Following is a summary of general conclusions and observations from the work we have done to date:

1. Noise Impact: Switching to stationary horns could dramatically reduce noise impact near the grade crossings. The amount of reduction would depend on the loudness and directivity of the wayside horns. To some degree, the reduction would also depend on how many and where the wayside horns are installed.
2. Grade Crossing Safety: There is the real possibility that safety at the grade crossings will be improved with the wayside horns. Present plans are that the wayside horns will be sounded for the full approach time of 8 to 10 seconds. Even though the maximum sound levels of the wayside horns may be slightly lower than the maximum sound levels of the existing train horns, because the wayside horns would be located right at the intersection, the warning signal at crossing danger zones would be louder except for the last one to two seconds before the train reaches the intersection, at which point it would probably be too late for a car to get out of a danger zone.
3. Train Direction: The stationary horns will not provide information about which direction the trains are coming from. It is unclear how important this is since it is difficult to identify the direction of a sound source from inside a car, particularly with the windows closed and the radio on. From spending a short time at 130th Street listening to trains approaching the grade crossing, it seemed like I could sometimes tell which direction the train was coming from. I suspect this is most important when two trains approach the grade crossing at almost the same time or when a driver is in the danger zone as the train approaches.
4. Literature Review: A review of the literature reveals considerable research into grade crossing safety, although most is oriented toward active devices such as warning lights, bells and automatic

gates. It is clear that installation of automatic gates at grade crossings has significantly reduced the national accident rate at railroad grade crossings. It is also clear that sounding train horns before crossings with active warning devices represents a redundant warning and is not the primary method of alerting people that a train is approaching. There is no indication in the available studies that the ability to determine from the horn noise the direction that a train is coming from is a relevant factor for grade crossing safety.

5. Emergency Vehicle Sirens: Studies of effectiveness of emergency vehicle sirens have shown that the siren noise must be quite high right outside a car to be sure that the driver will hear the siren. Although train horns serve a similar purpose as emergency vehicle sirens, since the horn is not the primary warning that a train is approaching, studies on effectiveness of emergency vehicle sirens may not be relevant to grade crossing safety. Drivers are not normally expecting emergency vehicles, which means that the siren must cut through the background noise and get the attention of a driver who is not thinking about an emergency vehicle. In contrast, at a gated crossing with the gates down, lights flashing and bells ringing, most people are expecting that a train is approaching the crossing. When drivers get impatient and go around the gates, they will probably hear a train horn and initiate evasive action even though the horn sound level is well below what is required for most people to hear an emergency vehicle siren.

5. Florida Whistle Ban: A study of the accident rate following banning of nighttime train whistles at most public grade crossings on the Florida East Coast Railroad clearly demonstrated that the accident rate increased as a result of the whistle ban. The study concluded that the grade crossing accident rate approximately tripled as a result of the nighttime whistle ban. This was a surprising result, but does seem to show that, at least for this one freight line, the train horns contribute to grade-crossing safety. A more limited ban on train whistles in Eugene, Oregon showed a similar result.

2. SUMMARY OF LITERATURE REVIEW

As part of our assessment, we did a literature search of available research and design information on railroad grade crossings. We particularly looked for information on effectiveness of audible warning signals and approaches to improve safety. Some of the most interesting reports are summarized below.

Study of Acoustic Characteristics of Railroad Horn Systems (1993)^{1*}

This study reports on sound level characteristics of train warning horns including several freight locomotives, commuter rail locomotives, and a prototype automated wayside horn system. The report provides useful information on acoustic characteristics of train horns. A general observation was that a horn with a broadband signal is more likely to overcome background noise and attract motorists' attention. The implication is that a five-chime horn system is more effective than a three-chime horn system. The same group has apparently completed a draft report on train horn audibility inside motor vehicles, but that report is not available at this point. In fact, the person that I talked to at the Volpe National Transportation Systems Center was pointed in not revealing any of the conclusions of that study. In a subsequent conversation with another person involved in the study, I got the impression that the results may seem to contradict the results of the study on the Florida Train Whistle Ban (discussed below).

Method for Estimating the Audibility and Effective Loudness of Sirens and Speech in Automobiles (1976)²

Effectiveness of Audible Warning Devices on Emergency Vehicles (1978)³

The overall conclusion was that emergency vehicle warning signals often are not noticed by motorists. Ensuring that all motorists will hear warning signals requires a relatively high noise level outside the vehicle because of potential masking noise from normal road noise and radios and the high level of outside-inside sound insulation when windows are closed. We did not find any specific studies of audibility or effectiveness of train horns, just these two studies from the late 70's on emergency vehicle sirens.

Driver Behavior at Rail-Highway Crossings (1990)⁴

This is a fairly recent comprehensive review of literature pertaining to driver behavior at grade crossings. There is a wealth of general information in here related to grade crossing safety, although only a brief discussion of train horns with the general conclusion that the horns are useful to supplement the visual clues, but not as the primary means of alerting the motorist. They note that: "Perhaps consistent with this

*References listed at end of report.

view, there is relatively little research, or even discussion in the literature, about the effectiveness of auditory signals." Following is a summary of some of the discussion about the horns:

- In contrast to visual stimuli, auditory signals have the advantage of not requiring the listener to be oriented toward the signal. However, auditory signals for grade crossings suffer from serious drawbacks and are not generally considered sufficient as a primary means of alerting the motorist. The author states that auditory signals are best viewed as a supplementary form of warning.
- No actual research on the perception of train signals was uncovered. Neither the change in loudness nor the Doppler effect were considered to be important for detecting trains.
- The conflict with community noise is an inherent limitation on use of train horns at grade crossings. An optimal warning signal must alert most motorists when the train is still sufficiently far from the crossing that the motorist can take appropriate action. Annoyance and interference with home or workplace activities can take place at sound levels much lower than those required to meet the driver warning criteria.
- The intensity of an acoustic signal is limited by three important constraints in addition to the realistic limits on the sound level at the source: (1) geometric spreading attenuation (6 dB attenuation with every doubling of the source/receiver distance); (2) physical barriers that reflect or absorb sound including the car structure and window, foliage, and buildings; and (3) climatic conditions, particularly wind, which can reduce the sound level 5 to 10 dB at distances of 1000 ft.
- Based in part on a study by Aurelius and Korobow⁵ in 1975, a 1985 NTSB Safety Study concluded that current FRA standards for horn performance levels were inadequate, and recommended that they at least be raised to the levels of Amtrak horns. The current FRA standard is a minimum sound level of 96 dBA 100 feet in front of the train and Amtrak horns are 10 to 15 dB louder than this. Because of the difficulty in hearing trains from inside a motor vehicle, there have been suggestions that all drivers be required to roll down their windows and reduce speed when approaching grade crossings.
- The results of the Aurelius and Korobow study was also referenced as indicating that a warning signal of 109 dB was required to be heard inside a motor vehicle traveling between 51 and 65 mph. With the Blue Line train horns, you have to be within 25 feet of the front of the train before the sound level is 109 dB. Clearly if motorists do not hear the train horn until it is 25 feet away, it is already too late.

- Given the limitations of visual warnings, it would be desirable to provide redundant information through other channels such as rumble strips in the pavement. These suffer the limitation of being passive devices, unrelated to train presence. The author suggested that consideration be given to other active devices to provide auditory/tactile cues such as raising or lowering some otherwise flush elements in the road or highly focused acoustic signals that are less environmentally intrusive. The second suggestion sounds very similar to the proposed wayside horn system for the Blue Line.

Some interesting observations and conclusions in this report that are not specifically related to the train horns are:

- Trains are not very visible at night. Use of xenon strobe lights can markedly improve visibility and the ability of people to judge train speed. There have been some studies with xenon strobes, however the "evidence supporting the effectiveness of roof mounted xenon strobes consists of primarily subjective judgements of conspicuity, made by observers who were expecting to see a strobe-equipped train."
- White xenon strobe lights were found to be much more conspicuous than standard 8 3/8" incandescent flashers. They were recommended as a supplement to standard flashers on the crossing buck or the gate. Some possible drawbacks to this approach were pointed out.
- Warnings lose their effectiveness if they are not credible. False alarms are the most serious case, although the credibility of active signals will also be weakened if the delay before a train is so long that waiting is unnecessary.
- Violations at crossings with active warning devices are less common when they have a constant time warning feature. Four quadrant gates were found in one study to have violation rates near zero. I understand that the Southern Pacific tracks sharing the right-of-way with the Blue Line have constant time warning signals.
- People often have difficulty judging the speed, distance, and closing rate of trains at grade crossings.
- Directional arrows were suggested as a means of indicating direction of the oncoming train. These apparently are used in some countries.
- There are a small percent of people who believe it is okay to go around gates.

- People are often insensitive to multiple track crossings and do not comprehend sight restrictions at grade crossings.
- Motorists who go around gates and get hit are not aware of how close the train is to the grade crossing, misjudge the train speed, have impaired judgement because of alcohol/drug use, or do not realize a second train is coming. It seems apparent that anybody driving around a grade crossing gate must be aware that a train could be coming because of the bells, lights, and automatic gates. This seems to indicate that there is no need to provide the redundant warning of the horn for motorists who are still some distance from the grade crossing. Also, anything that makes the trains more visible and makes it easier to perceive train speed would improve safety.

Florida's Train Whistle Ban (1992)⁶

In 1984, the Florida State Legislature enacted legislation that allowed local jurisdictions to ban nighttime train whistles at all eligible grade crossings. To be eligible, the crossings had to be equipped with automatic gates, flashing lights, bells, and special advance warning signs. This legislation primarily applied to the Florida East Coast Railway Company (FEC). By the end of 1989, the ban was effective at all but 89 of FEC's 600 public grade crossings. This FRA study was in response to a request by a Florida Representative to see if there was "any correlation between those areas that have regulations about whistle blowing after dark and the number of freight [train] crossing accidents?" The study, which seems to have been a very careful statistical analysis, shows a dramatic increase in the accident rate. The study authors responded to a number of suggestions that other factors that might be responsible for the increase in accident rate and appear to have carefully evaluated the potential for these factors to have any influence on the results. I have not attempted to check the statistical analysis, however, there does not seem to be any question but that the accident rate increased after whistles were banned at night.

The conclusion of this report seems to be a direct contradiction of all the information that warning signals are not very audible inside motor vehicles. Since all of the grade crossings had automatic gates, flashing lights, and warning bells, it seems unlikely that motorists involved in accidents did not realize a train was probably approaching the crossing. Assuming that motorists know that a train could be coming, accidents must be due to errors in judgement about how far away the train is or by not seeing the train. Sounding the whistle might provide an extra degree of warning or a verification that a train is really coming. This may be what it takes to stop a driver who is prone to go around a down gate. Correspondingly, if the driver is already around the gate and on the tracks, they would be very sensitive to train horn noise and likely to react quickly to accelerate out of the danger zone when they heard a train whistle.

As a result of this study, the Federal Railway Administration issued FRA Emergency Order No. 15 requiring the Florida East Coast Railway Company to use train-borne audible warning devices.

3. NOISE IMPACT ASSESSMENT

3.1 Noise Models

We have developed mathematical models to calculate noise exposure at grade crossings with both train mounted and wayside horn systems. These have been used to develop noise exposure contours for the El Segundo Blvd. and 130th Street areas. The grade crossings at El Segundo Blvd. and 130th Street have been selected for demonstration of the wayside horn system. The crossings are located in the Willowbrook area, approximately 0.1 miles apart. There are two Blue Line tracks and one Southern Pacific track at both crossings. The crossings are presently protected by automatic flashing lights, gates, bells, and traffic signals.

The input for the train horn model is based on sound level measurements of the horn on a Blue Line vehicle. For the wayside horn, we have used the information provided by Clever Devices and the sound level recommendations summarized in Section 4. The input parameters are summarized in Table 1.

3.1.1 Train Horn

Following is a brief summary of the primary features of the train horn model:

Loudness: We did some measurements in the storage yard of the sound level of the horn on a Blue Line vehicle. The horn system is a single air horn located at the lower right-hand side of the vehicle. It is mounted on the truck slightly under the front of the car. The measurements showed the sound level to be 95 to 97 dBA 100 feet directly in front of the vehicle. We understand that the specification is for a sound level of 97 dBA. The level would drop slightly below this just before the air compressor would kick in to recharge the air pressure.

The specification for the Blue Line horns requiring 97 dBA at a distance of 100 feet is equivalent to the Federal Railroad Administration (FRA) requirement for freight train horns, although the horns used on Amtrak trains and most freight trains are considerably louder than the FRA requirement. The California Public Utilities Commission (CPUC) requirement is that horns on light rail vehicles have a sound level of at least 85 dBA at a distance of 100 feet.

Directivity: The horn noise is loudest directly in front of the train. The measurements in the Blue Line storage yard indicate that the sound level drops about 7 dB perpendicular to the train and 14 dB directly behind the train. We modeled the directivity as a smooth function by fitting the known values to a cardioid function.

Duration: The model allows specifying the distance from the intersection that the train horn sequence is initiated. For the modeling, we assumed that the horn is sounded continuously from this point until the train reaches the intersection. We did not try to model the long-short-long-long sequence. Since the break between each part of the sequence is quite short, this simplifying assumption has an insignificant effect (less than 1 dB) on the projections of community noise.

Shielding: The buildings and other structures around the grade crossing will act as acoustical shielding reducing the levels of train noise for receivers behind the structures. At this point, we have not accounted for shielding when calculating the noise exposure contours. As discussed later, we did approximate shielding when estimating the time history of train horn noise at the intersection. The shielding will limit the impact zones to one or two rows of buildings from the tracks.

The model starts the train horn at the specified distance from the crossing and assumes that it is sounded continuously until the train reaches the crossing. Train speed, which is an input variable, is used to determine how long the horn is sounded. Sound levels are calculated over a grid around the grade crossing. At each point in the grid, SEL* is calculated by numerical integration of sound level for specified time steps. In a similar manner, the maximum sound level (L_{max}) is determined using the same time steps. By using a numerical approach, it is not necessary to force the directivity function into any simple mathematical model. We used the cardioid functions simply because they seemed to give a reasonable representation of the directivity. Other functions could be used without changing the model formulation. It is possible to get a closed form solution for this model when a uniform (monopole) directivity is used. We did not use this approach since the train horns cannot be accurately modeled as monopole noise sources.

The model was implemented using MathCAD to calculate SEL and L_{max} over a grid of points around the grade crossing. Two models were run, one for a grade crossing where the horn blowing starts 800 feet before the crossing and one where it starts 580 feet before the crossing.** The results were combined

*SEL (Sound Exposure Level) is a measure of the sound energy of a single train/horn event.

**The 800 foot distance applies to trains approaching El Segundo southbound and 130th Street northbound. The 580 foot distance applies to the other directions where the trains are between El Segundo and 130th.

into a single spreadsheet of noise exposure at grid points covering the entire El Segundo/130th Street area. This grid was then used to generate noise exposure contours. A similar grid of L_{max} values was used to generate L_{max} contours.

3.1.2 Wayside Horn

Loudness: The loudness of the horns is a variable in the model. As discussed below, we tried to pick a horn sound level that would provide warning equivalent to the train horns. In addition, contours were developed for 5 dBA louder and quieter wayside horns.

Directivity: The horn attenuation at 0 degrees (looking straight down the tracks) is assumed to be 0 dB. The horn attenuations at 90 and 180 degrees are input variables for the model. Cardioid functions are used to create a smooth directivity function connecting these three points.

Duration: The wayside horns were assumed to be sounded exactly the same as the train mounted horns. Duration is one of the parameters put into the model.

Location: Two loudspeakers were assumed for each grade crossing, one at the approximate location of each crossing gate. The speakers were assumed to be cantilevered over the center of the oncoming traffic lanes, pointed perpendicular to the tracks. It does not appear that the noise impact would change much if the loudspeaker locations were shifted 10 to 20 feet either direction.

The model for the wayside horn is considerably simpler than the model for the train horn since the horns are stationary. The model was implemented in a spreadsheet with sound energies calculated for a grid of points around the grade crossing. The grid values were used to generate contours for L_{max} and L_{dn} .

3.2 Comparison of Noise Impacts.

With the wayside horn system, the overall noise impact will depend on how loud the horns are, the direction they are pointed in, how long they are sounded for each train passby, and where they are mounted. For this initial assessment, we have assumed that two horns will be used and that they will be located above the center of the right lane at the approximate location of the grade crossing gate. The specific parameters used for the noise impact comparison are summarized in Table 1.

To define an appropriate level for the wayside horn, we looked at the train horn sound level time history at three typical motorist positions:

- Location 1: A car waiting at the light to make a left turn from the southbound direction of Willowbrook West onto El Segundo eastbound.
- Location 2: A car on El Segundo eastbound waiting at the intersection of El Segundo and Willowbrook West.
- Location 3: A car waiting to make a right turn from northbound Willowbrook West onto El Segundo eastbound.

Figure 1 illustrates the sound level of the train horn as it approaches the intersection. For this calculation, we have incorporated a reasonable estimate of excess attenuation of the train horn sound levels to make the comparison of the wayside and train horn levels more realistic. This accounts for effects such as shielding by buildings and other obstacles, and excess ground attenuation from propagation along soft ground. We have assumed 8 dB excess attenuation when the train is 800 feet away, and 1 dB when the train is 200 feet away. At distances less than 150 feet, no excess attenuation is assumed. Linear interpolation was used to generate a smooth function.

The wayside horn comparisons shown in Figure 1 assume a sound level of 90 dBA at 100 ft for the wayside horns. A particularly notable feature of this figure is that although the maximum train horn noise levels are between 90 and 94 dBA, the horn noise does not exceed 85 dBA until the train is about 2 seconds from the intersection. An 85 dBA sound would be difficult to hear inside many cars if the windows are closed. With respect to the appropriate loudness for the wayside horn system, Figure 1 indicates that:

1. Wayside horns generating 90 dBA at 100 ft will have maximum sound levels 1 to 4 dBA lower than the existing train horns.
2. It appears that the warning that would be provided by 85 dBA wayside horns would be approximately equivalent to the warning provided by the existing train horns. The maximum sound level of the train horn is higher, but only for one or two seconds before the train enters the intersection. There should be a tradeoff between the lower maximum levels and the longer time that the signal is audible.
3. Wayside horns generating sound levels of 95 dBA at 100 feet would be considerably louder than the existing train horns. At locations where pedestrians wait for the trains to pass, the sound levels could be as high as 100 dBA, which would probably sound inappropriately loud.

Figure 2 illustrates L_{max}^* contours for train and wayside horn systems assuming a wayside horn sound level of 90 dBA at 100 feet. This illustrates that the maximum sound levels are approximately the same for both systems in the immediate vicinity of the grade crossings. However, the train horn spreads the noise out over a much larger area than the wayside horn.

A better indication of the community noise impact is given by the L_{dn}^{**} contours in Figures 3 through 5. L_{dn} provides a better comparison of total noise impact since it is a measure of cumulative community exposure to noise over a 24-hour period. Each figure shows the L_{dn} 65 and 70 dBA contours. Although we do not have noise measurements in the vicinity of the El Segundo and 130th Street crossings, ignoring all train noise, the existing L_{dn} is likely to be around 65 dB. Since the model we used to estimate L_{dn} does not include any factor for acoustic shielding, these contours tend to overestimate the impact except in areas with a clear view of the tracks and the grade crossing. Following are some points of note about the three L_{dn} figures:

1. If an 85 dBA wayside horn can provide sufficient warning of approaching trains, noise impact can be reduced to the immediate vicinity of the grade crossings.
2. For a 90 dBA wayside horn, the noise impact within a couple of hundred feet of the grade crossings will be approximately the same as now exists. However, the impact at greater distances from the crossings will be substantially less.
3. If 95 dBA wayside horns must be used to provide adequate warning, there are likely to be some areas where noise impact increases within 300 to 600 feet of the grade crossing. The total impact area would not be significantly smaller than what exists now as can be seen in Figure 5. If it is necessary to use a horn that is this loud, the wayside horn system will not significantly reduce community noise impact.

* L_{max} : The maximum sound level during an event. This is the maximum number that would be read off of a sound level meter as a train approaches the grade crossing with the horn blowing.

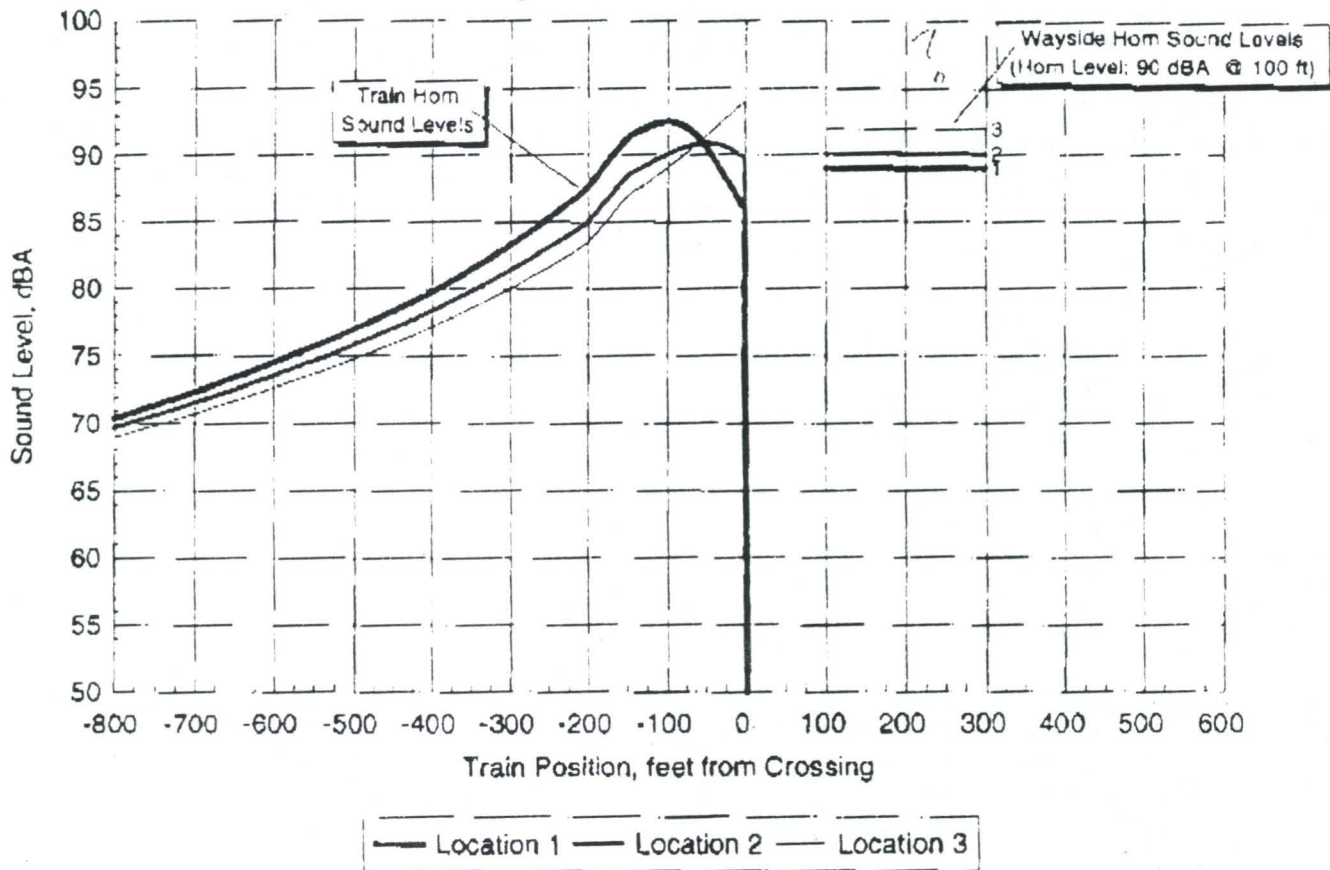
** L_{dn} : L_{dn} is the abbreviation for the Day-Night Equivalent Level. The abbreviation DNL is also used. L_{dn} is a measure of community noise exposure over a 24-hour period. It is basically a gauge of how much noise energy there is in a community over a 24-hour period accounting for the number and duration of all noise events. In calculating L_{dn} , a 10 decibel weighting is added to nighttime noises to account for people being more sensitive to noise at night than during the daytime hours. The effect of this weighting is that, in calculating L_{dn} , one train at night is equivalent to 10 trains during the daytime. Nighttime is defined as 10 pm to 7 am.

Table 1. Parameters Used for Noise Impact Comparison

| | | |
|--|---|----------|
| <u>Train Horn</u> | | |
| Sound Level:* | 96 dBA | @ 100 ft |
| Directivity:* | 0 degrees | 0 dB |
| | 90 degrees | -7 dB |
| | 180 degrees | -14 dB |
| Train Speed: | 55 mph | |
| Horn Start: | | |
| SB | 800 ft before El Segundo Blvd. | |
| | 580 ft before 130th Street | |
| NB | 800 ft before 130th Street | |
| | 580 ft before El Segundo Blvd. | |
| <u>Stationary Horn</u> | | |
| Sound Levels: | 85 dBA | @ 100 ft |
| | 90 dBA | @ 100 ft |
| | 95 dBA | @ 100 ft |
| Directivity: | 0 degrees | 0 dB |
| | 90 degrees | -7 dB |
| | 180 degrees | -12 dB |
| Locations: | Two horns located above center of right traffic lanes at approximate location of crossing gate. Horns facing perpendicular to tracks. | |
| Duration: | Same as for train mounted horn (approximately 10 sec when started 800 feet before crossing and 7 to 8 seconds when started 580 feet before crossing). Both wayside horns sounded for every NB and SB train. | |
| Equivalent number of trains per day:** | 248 In each direction | |

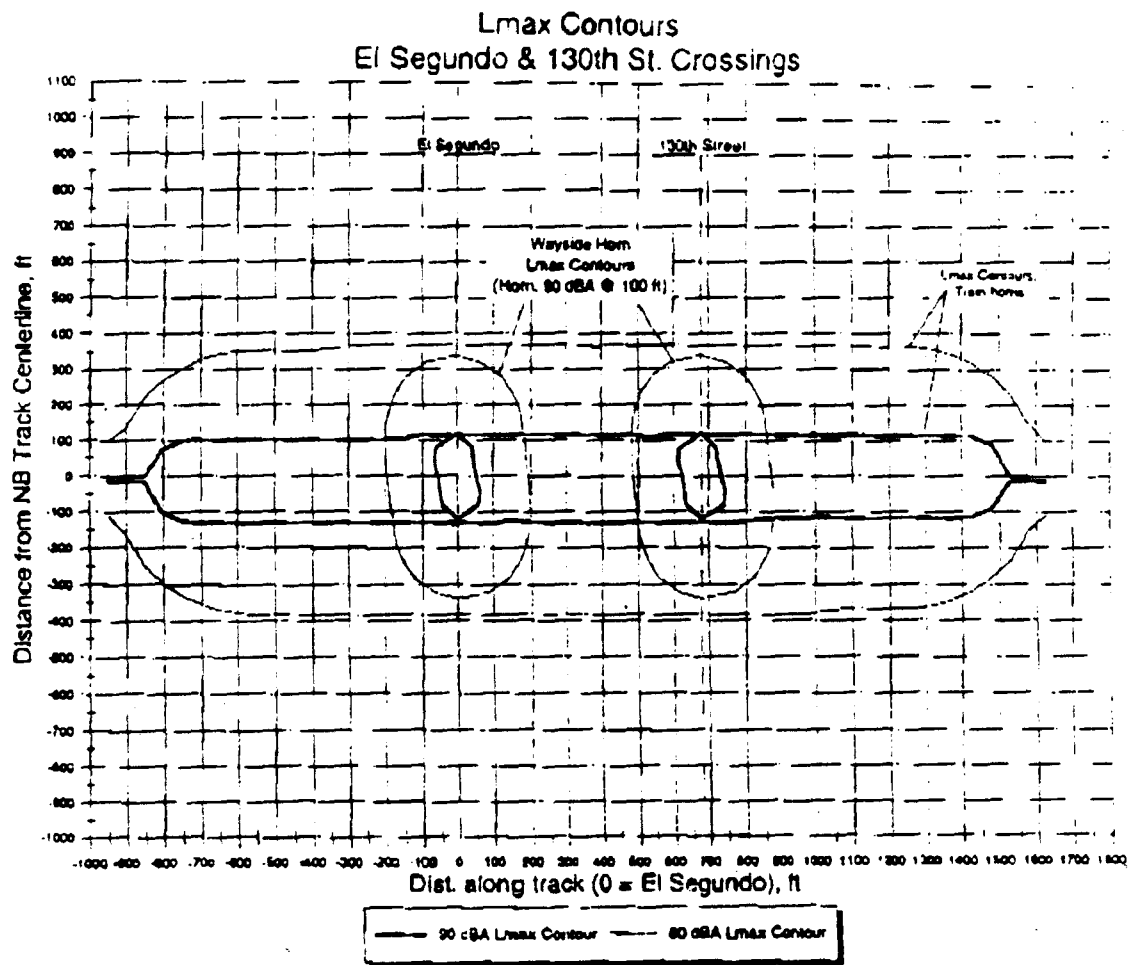
- Notes:
- * Sound level and directivity based on measurements of a Blue Line vehicle horn.
 - ** Equivalent number of trains per day for Ldn calculation. This is equal to the total number of daytime trains plus ten time the number of nighttime trains.

Train Horn Sound Level Time History El Segundo & Willowbrook



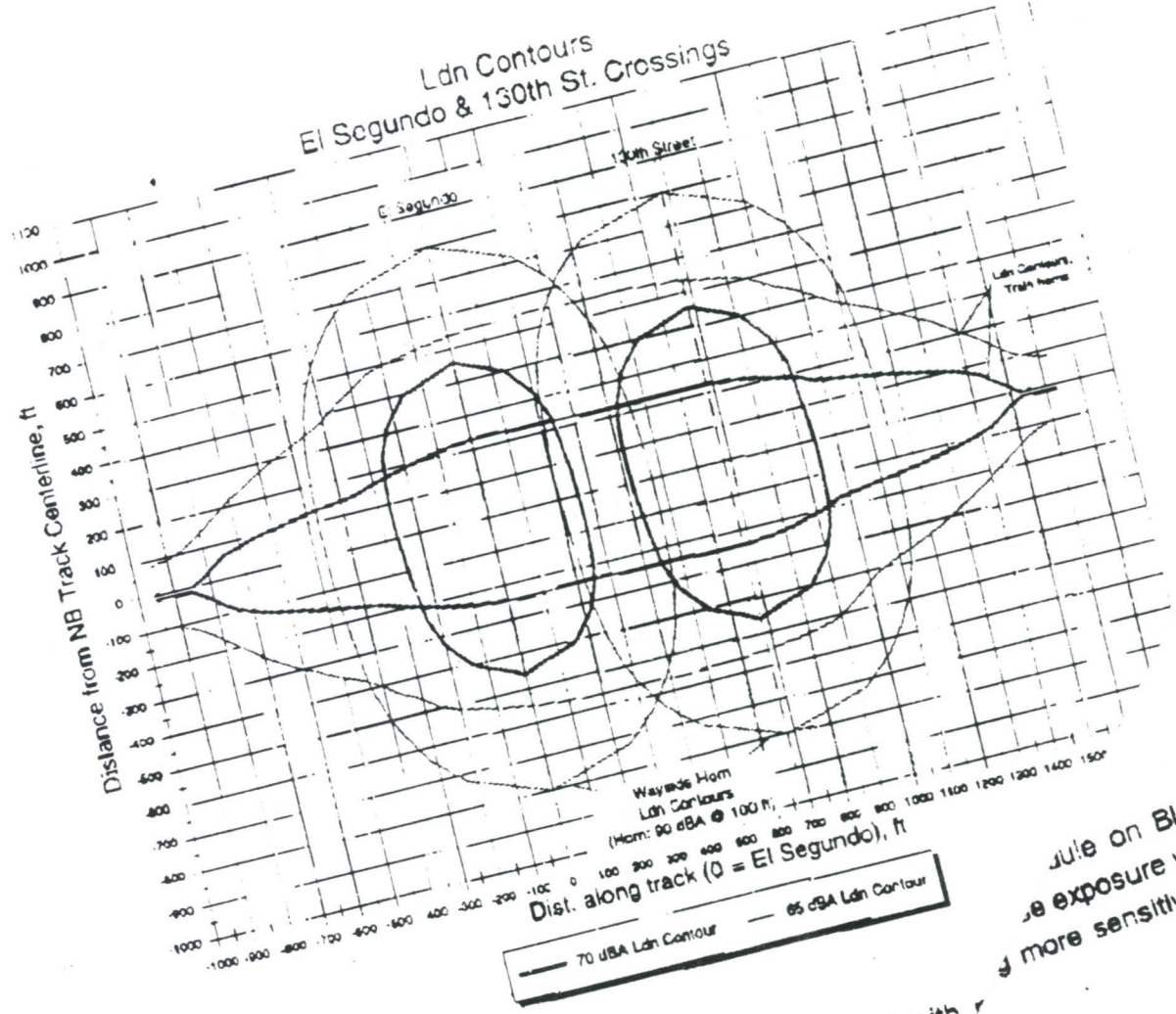
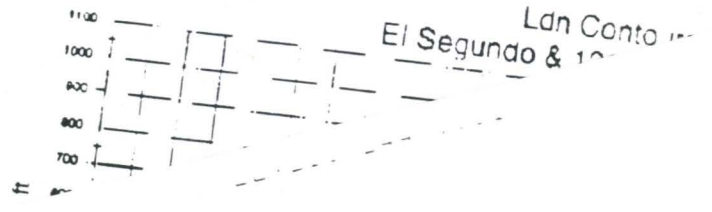
- Location 1: Southbound Willowbrook (west barrel)
- Location 2: Eastbound El Segundo
- Location 3: Northbound Willowbrook (west barrel)

Figure 1. Horn Sound Levels at Motorist Positions



Lmax: Maximum sound level from train horn or wayside horn.

Figure 2. Lmax Contours, 90 dBA Wayside Horn



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rule on Blue
 exposure with
 more sensitive to

Ldn: Day-Night Equivalent Level with r
 Line. Ldn is a measure of 24-hr
 a weighting factor to account
 night during nighttime hour
 Wayside Horns

4. PRELIMINARY RECOMMENDATIONS AND ISSUES TO BE RESOLVED

Base on the analysis to this point, we have developed the following recommendations for the wayside horns demonstration project:

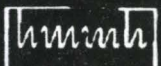
1. **Area of Influence:** Since most motorists are already alerted that a train may be approaching by the lowered gates, flashing lights, and ringing bells, it seems safe to assume that most vehicles will stop at the grade crossings. The horns would then serve to make sure that these people realize that a train is really coming. The horn will not be a primary means of alerting motorists driving on Willowbrook or other streets who are approaching the grade crossing. This means that the horns only need to be heard by motorists and pedestrians in the immediate vicinity of the grade crossing.
2. **Number and Location of Horns:** For our noise impact analysis, we have assumed two wayside horns at each grade crossing will provide sufficient coverage. The data sheet from Clever Devices indicates a directivity with relatively uniform coverage from about 0 to 45 degrees with the sound levels dropping off to about -7 dB at 90 degrees. We have assumed -12 dB at 180 degrees (directly behind the horn). The optimum location for the horns appears to be mounted fairly high over the center of the oncoming traffic lanes. Pointing the horns slightly downwards will tend to focus the noise towards areas where audible warning is most likely to make a difference. This will also minimize radiation of the horn noise into the surrounding community.
3. **Loudness:** In order for the wayside horns to provide a warning that is as effective as the train horns, the sound level should be at least 85 to 90 dBA at 100 ft. It would be best if the volume can be adjusted after the wayside horn system is in place to allow for subjective evaluation of the appropriate sound level.
4. **Pedestrians:** The literature we reviewed did not include any discussion of whether train horns are important for pedestrian safety. It seems that the crossing gate bells would be a sufficient warning of an approaching train, however, it is possible that the redundant warning from train horns reduces the pedestrian accident rate.
5. **Evaluation of Effectiveness:** There seems to be at least two basic approaches to evaluating the effectiveness of the warning system: interviews of motorists and pedestrians after they have waited at the grade crossing intersection or video tapes of behavior at the grade crossing. In both cases it is desirable to do similar tests before and after the wayside horns are operational. Both approaches can be labor intensive for a thorough, statistically valid evaluation.

Some of the unresolved questions and issues to be resolved by testing include:

1. Placement of loudspeakers: For our modeling we assumed the horns would be cantilevered over the center of the oncoming traffic lane. The field tests should confirm whether this is an appropriate location and whether one loudspeaker on each side of the grade crossing provides sufficient coverage.
2. Directing loudspeakers: With the loudspeakers located relatively high above the intersections, it may be possible by pointing the speakers downward to focus the sound at the intersection and reduce the sound radiated into the community. This would be most effective with the speakers located relatively high over the intersection.
3. Loudspeaker volume: With the loudspeakers located close to the danger areas, it may be feasible to reduce the loudspeaker volume even further than assumed for our modeling. An important aspect of the field tests will be to define the optimum sound level for a wayside horn system.
4. Variable volume: One possibility for making the warning more noticeable is to have the loudness of the horn sound increase depending on how close the train is to the intersection. This would probably be difficult with the planned system of activating the wayside horns using the train horn button.
5. Automatic volume control: It may be possible to use a circuit to control loudspeaker volume based on the background noise. This type of circuit will reduce the loudspeaker volume when background noise is low, particularly during nighttime hours. The type of system is sometimes used for public address systems to make sure that announcements are always audible over the background noise but are not excessively high.
6. Two trains at same time: In the short time that I observed at the 130th Street grade crossing, there were several times where northbound and southbound trains approached the crossing simultaneously. A question to be considered is whether wayside loudspeakers can be as effective as the train horns in alerting motorists and pedestrians that a second train is approaching the grade crossing. A concern is that the horn sound for the second train will be interpreted as a continuation of the warning for the first train. With train mounted horns, there is the possibility that being able to detect which direction the train is coming from reduces the danger of nearly simultaneous trains.

REFERENCES

1. AS Keller, EJ Rickley, "The Safety of Highway-Railroad Grade Crossings: Study of Acoustic Characteristics of Railroad Horn Systems," US Department of Transportation Research and Special Programs Administration, Volpe National Transportation Systems Center (Report # DOT-VNTSC-FRA-93-1), Sponsored by Federal Railroad Administration Office of Research and Development, Equipment and Operating Practices Research Division (Report # DOT/FRA/ORD-93/25), July 1993.
2. ELR Corliss, FE Jones, "Method for Estimating the Audibility and Effective Loudness of Sirens and Speech in Automobiles," *J. Acoust. Society of America*, 60(5), pp 1126-1131, Nov. 1976.
3. SC Skeiber, RL Mason, RC Potter, "Effectiveness of Audible Warning Devices on Emergency Vehicles," *Sound & Vibration*, Feb. 1978.
4. N Lerner, D Ratte, J Walker, "Driver Behavior at Rail-Highway Crossings," study performed by Comsis Corporation under contract to Federal Highway Administration, Office of Highway Safety, Program Development Division, Report # FHWA-SA-90-008, June 1990.
5. J.P. Aurelius, N. Korobow, "The Visibility and Audibility of Trains Approaching Rail-Highway Grade Crossings," US Department of Transportation, Federal Railroad Administration (Report No. FRA-RP-71-2), 1978.
6. BF George, "Florida's Train Whistle Ban, Second Edition," Federal Railroad Administration, Office of Safety, September 1992.



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2.3.8.4 Changes to Transportation/Circulation Section

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ECHELON INDUSTRIES, INC.

19811 E. COLIMA RD., SUITE 620, WALNUT, CA 91789
PHONE: (909) 594-1891 FAX: (909) 598-3810

May 3, 1994

Mr. Harley Martin
Environmental Planner
Los Angeles County Metropolitan Transportation Authority
818 West Seventh Street, 5th Floor
Los Angeles, California 90017

RE: Pasadena-Los Angeles Light Rail Draft SEIR Addendum

Dear Mr. Martin:

Listed below are changes to Table 2.2-1 and Section 4.7, the traffic analysis portion of the above referenced project. Please note that the changes are to be made in the draft SEIR by Tetra Tech.

| | |
|---------------|--|
| Location | Page 2-5 Table 2.2-1 Environmental Issue: Transportation and Circulation Mitigation Measures |
| Original Text | 1. Exclusive "left turn," "right turn," and "contra-flow" lanes, restriping, signing, signal timing, on-street parking restrictions, and Park and Ride management. |
| Revised Text | 1. Exclusive "left turn" and "right turn" lanes, restriping, signing, signal timing, and on-street parking restrictions. |
| Location | Page 4-54 Section 4.7.1 Paragraph 1, Sentence 1 |
| Original Text | The revisions to the LRT project include Park and Ride facility alternatives (approximately 1,000 spaces) in the vicinity of Sierra Madre Villa Avenue in Pasadena, closure of Avenues 51, 53, 55, 58, and 61 proposed along the Marmion Way corridor in Highland Park, and a below-grade separation at Marmion Way and Figueroa Street. |
| Revised Text | The revisions to the LRT project include Park and Ride facility alternatives (approximately 1,000 spaces) in the vicinity of Sierra Madre Villa Avenue in |

Mr. Martin
May 3, 1994
Page 2

Pasadena, closure to through traffic of Avenues 51, 53, 55, 58, and 61 (south of Figueroa), where the streets cross the LRT right-of-way, proposed along the Marmion Way corridor in Highland Park, and a below-grade separation at Marmion Way and Figueroa Street.

Location Page 5-54
Section 4.7.1.1
Paragraph 1, Sentence 1

Original Text Semi-exclusive operation of the LRT in the Marmion Way corridor and the closure of Avenues 51, 53, 55, 58 (south side) have been proposed.

Revised Text Semi-exclusive operation of the LRT in the Marmion Way corridor and the closure to through traffic of Avenues 51, 53, 55, 58, and 61 (south of Figueroa), where the streets cross the LRT right-of-way, have been proposed.

Location Page 4-54
Section 4.7.1.1
Paragraph 5

Original Text An analysis of existing conditions was conducted using the ICU approach, as described above and as requested by LADOT.

Revised Text An analysis of existing conditions was conducted using the Intersection Capacity Utilization (ICU) approach. This is the methodology prescribed by the Los Angeles Department of Transportation (LADOT). The operating conditions at intersections are measured on a scale from A to F, inclusive. These values are referred to as Levels of Service (LoS). LoS A represents excellent operation conditions with minimal or no delays, while LoS F represents significant congestion and measurable delays. At LoS F, the traffic demands typically exceed the capacity of the roadway. Appendix D contains a more detailed description of LoS standards (Table D-1).

Location Page 4-58
Section 4.7.1.2
Heading: East-West Roads
Paragraph 3

Original Text An analysis of existing conditions was conducted using the Intersection Capacity Utilization (ICU) approach. This is the methodology prescribed by the City of Pasadena [and the Los Angeles Department of Transportation (LADOT)]. The operating conditions at intersections are measured on a scale

Mr. Martin
May 3, 1994
Page 3

from A to F, inclusive. These values are referred to as Levels of Service (LoS). LoS A represents excellent operation conditions with minimal or no delays, while LoS F represents significant congestion and measurable delays. At LoS F, the traffic demands typically exceed the capacity of the roadway. Appendix D contains a more detailed description of LoS standards (Table D-1). The Johnson and Johnson/Merck site and the Builders Emporium site are referred to as the Northern and Southern Sites, respectively, in Appendix D.

Revised Text An analysis of existing conditions was conducted using the ICU approach, as described above and prescribed by the City of Pasadena.

Location Page 4-76
Section 4.7.5.2
Subheading: Sierra Madre Villa Avenue and Foothill Boulevard
Paragraph 1, Sentence 3

Original Text Changes to signal timing and detector placement would also be required.

Revised Text Changes to signal timing and detector placement would also be required. On-street parking on the north side of the westbound approach within 200 feet of the intersection will also have to be prohibited.

Location Page 4-76
Section 4.7.5.2
Subheading: I-210 West-bound Ramps and Sierra Madre Villa Avenue
Paragraph 1

Original Text **I-210 West-bound Ramps and Sierra Madre Villa Avenue** - If the Johnson and Johnson/Merck site is chosen, the impacts at this intersection will need to be mitigated. This can be accomplished through parking management or two left turn lanes onto I-210. A 6 to 7 percent reduction in the peak periods should be adequate.

Revised Text **I-210 Westbound Ramps and Sierra Madre Villa Avenue** - If the Johnson and Johnson/Merck site is chosen, then the impacts at this intersection will need to be mitigated. This can be accomplished *either* through parking management *or* by providing two northbound to westbound left-turn lanes onto I-210.

Location Page 4-77
Section 4.7.5.2

Mr. Martin
May 3, 1994
Page 4

Paragraph 2

Original
Text

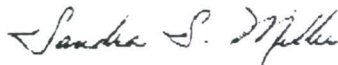
In summary, the impacts of the SMV Park and Ride operation can be mitigated with a combination of restriping, signal timing, on-street parking restrictions, appropriate management of the Park and Ride operation and continuation of the Regulation XV program. The choice of northern or Builders Emporium site need not be determined by traffic impact issues.

Revised
Text

In summary, the impacts of the SMV Park and Ride operation can be mitigated with a combination of restriping, signal timing, on-street parking restrictions, appropriate management of the Park and Ride operation and continuation of the Regulation XV program. It should be noted that parking management of the park and ride site is desirable but not required; the mitigation measures proposed will effectively mitigate the project's impacts. In addition, the choice of northern or Builders Emporium site need not be determined by traffic impact issues.

If you have any additional questions or concerns, please do not hesitate to give us a call.

Sincerely,
Echelon Industries, Inc.



Sandra S. Miller, P.E.
Principal Associate

SSM/kj/LAPAS.L03

ECHELON INDUSTRIES, INC.

19811 E. COLIMA RD., SUITE 620, WALNUT, CA 91789
PHONE: (909) 594-1891 FAX: (909) 598-3810

May 3, 1994

Mr. Harley Martin
Environmental Planner
Los Angeles County Metropolitan Transportation Authority
818 West Seventh Street, 5th Floor
Los Angeles, California 90017

RE: Pasadena-Los Angeles Light Rail Draft SEIR
Traffic Impact Analysis

Dear Mr. Martin:

We received your FAX containing the Notice of Preparation (NOP) for the Pasadena City College Community Skills Center Project Friday, April 30, 1994. We have not previously been provided any information about this proposed project and therefore it has not been included in our analysis.

If you have any additional questions or concerns, please do not hesitate to give us a call.

Sincerely,
Echelon Industries, Inc.



Sandra S. Miller, P.E.
Principal Associate

SSM/kj/LAPAS.L02

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2.3.8.5 LRT Improvements Near Arroyo Seco Alternative Magnet School, LAUSD

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April 21, 1994

Los Angeles County
Metropolitan
Transportation
Authority

8 West Seventh Street
Suite 300
Los Angeles, CA 90017

213.623.1194

Ms. Elizabeth Harris
Business Services Division
Los Angeles Unified School District
P.O. Box 2298
Los Angeles, California 90051

Dear Ms. Harris:

ARROYO SECO ALTERNATIVE MAGNET SCHOOL

This letter addresses our recent discussions and field trip to the Arroyo Seco Alternative Magnet School located along the Pasadena Blue Line in Highland Park.

We have enclosed two sets of full-size design drawings C-0311, C0312, C-0361, C0362, S-1401, S-1414 and S-1415 which depict the LRT improvements along the existing railroad alignment between Woodside Drive and North Avenue 49. The improvements are summarized below:

- Construction of two LRT tracks with alignment and profile as indicated on the enclosed drawings.
- Installation of drainage piping consisting of continuous underdrains to collect surface runoff within the right of way.
- Construction of retaining walls on the east side of the right of way extending from approximately 400' south of the extension of North Avenue 49 to the north end of the school playground. These retaining walls are necessary to widen the track bed for two LRT tracks and, with the proposed drainage improvements, should alleviate your concerns on slope stability. We have enclosed a letter received from our geotechnical consultant, Law/Crandall Inc., which addresses the stability of the slope.
- MTA will install a sound wall within the limits of the retaining walls discussed above either by raising the height of the wall or some other suitable treatment. The sound wall will mitigate LRV wheel noise but will not "hide" the entire vehicle.

Ms. Elizabeth Harris
April 21, 1994
Page 2

- Right of way fencing has not yet been determined, however, this particular area would certainly warrant fencing preferably placed at the right of way line. The fencing height would be approximately 6' to 8'. MTA cannot justify your request for a 30' high fence along the playground. As you indicated, LAUSD is already considering the installation of a high fence in this area to be built on school property.

If you have any additional questions, please contact me at (213) 244-7130.

Sincerely,



ROBERT BALL, P.E.
Acting Deputy Project Manager, Engineering
Pasadena Blue Line

RB [RO5-EX250]

cc: Laurence Weldon
Erik Collett
Kathryn Lim
Clark Adams



April 18, 1994

Mr. Erik Collett
Engineering Management Consultant
707 Wilshire Boulevard, Suite 2900
Los Angeles, California 90017

Subject: Supplemental Recommendations for Retaining Wall RB7
Avenue 45 to Avenue 50
Proposed Metro Pasadena Line Project
for the Los Angeles County Metropolitan Transportation Authority
Law/Crandall Project 2661.20672.0010

Dear Mr. Collett:

This letter presents foundation recommendations for the design of Retaining Wall RB7 located along the Metro Pasadena Line alignment from Avenue 45 to Avenue 50. A portion of this wall is located at the top of the slope that extends from the Arroyo Seco Alternative School to the east of the Metro Pasadena project in Highland Park. We performed a geotechnical investigation for the entire Metro Pasadena Line Project and submitted the results in a report dated June 9, 1993 (L92045.AE4).

Slope and Retaining Wall

The slope is on the eastern side of the proposed Metro Pasadena Line alignment, and currently has dense tree growth over portions adjacent to the Arroyo Seco Alternative School, especially at the base of the slope. Portions of the upper slope are less vegetated, being currently sporadically covered with seasonal weeds. There appears to be minimal control of sheet flow of water over the top of the slope. The slope generally appears to be grossly stable.

We have received plans for the proposed retaining wall from Mr. Eric A. Johnson of Willdan Associates, the Section Designer. The proposed retaining wall will be located at the top of the existing slope. The slope has an inclination that varies from about 1:1 to about 1.5:1 (horizontal to vertical). The wall will have a length of approximately 758 feet and will retain 2 to 9 feet of earth above current grade.

Recommendations

Geologic mapping during the geotechnical investigation and our closest borings to the wall area show that the existing railroad right-of-way is a filled embankment over either topsoil, older alluvium, or Puente Formation siltstone and sandstone. Because of the steepness of the existing slope, we recommend that the footings for the retaining wall be established below a plane having an inclination of 2:1 (horizontal to vertical) drawn upward from the base of the slope. This deepening of the retaining wall footings will reduce the influence of the walls and new fill on the existing slope and should not cause a reduction in the inherent stability of the slope.

April 18, 1994

Page 2

There is a possibility that the soils at the elevation of the planned footing bottoms could be fill soils. We recommend that all fill soils be excavated and replaced as properly compacted fill. The proposed retaining wall may be supported on either properly compacted fill or the undisturbed natural soils. The bearing value of the soils may be assumed to be 2,500 pounds per square foot. Footings should extend at least 2 feet below the lowest adjacent grade. A coefficient of friction of 0.5 may be used between the wall footing and the supporting soils. Because of the steep slope away from the wall, we do not recommend that the passive resistance of the soils be used for lateral resistance.

The retaining wall should be designed for the lateral earth pressure as given in the geotechnical report. In addition to the recommended lateral earth pressure, the wall should also be designed for the appropriate surcharge due to the traffic or rail vehicles.

All backfill should be properly compacted. Drainage of the wall backfill should be provided to prevent the buildup of hydrostatic pressures behind the wall. Either a backdrain or weep holes should be provided. To limit the amount of water flowing on the slope, we recommend that a lined drainage ditch be constructed at the base of the wall to collect water coming from the weep holes and to convey the water to an appropriate drainage device.

If designed and constructed in accordance with these recommendations, it is our opinion that the stability of the existing slope above the school will not be significantly affected by the proposed retaining wall.

The professional opinions presented in this letter have been developed using that degree of care and skill ordinarily exercised, under similar circumstances, by reputable geotechnical consultants practicing in this or similar localities. No other warranty, expressed or implied, is made as to the professional advice included in this letter.

Please call if there are any questions regarding this letter.

Sincerely,

LAW/CRANDALL, INC.



Mike Shahabi
Project Engineer



Marshall Lew, Ph.D.
Principal Engineer
Vice President



661/20672-10.L11/ymc

(2 copies submitted)

cc: Engineering Management Consultant
Attn: Mr. Bomi Ghadiali

**SECTION 3.0
PERSONS, ORGANIZATIONS, AND PUBLIC AGENCIES COMMENTING ON
THE DRAFT SEIR**

3.1 COMMENT LETTERS

Copies of all the letters received by the LACMTA commenting on the DSEIR are presented on the following pages. They consist of the following:

Public Agencies

City of Los Angeles, Department of Public Works, Bureau of Engineering (two letters)
City of Pasadena (six letters and memoranda)
City of South Pasadena
California Department of Transportation
California Public Utilities Commission

Businesses

John Caldwell Design, South Pasadena
Kevin Michael Studio, Pasadena
Lacy Street Production Center, Los Angeles
Legal Aid Foundation of Los Angeles
T.A. Nelson, P.E., Consulting Engineer

Private Organizations

Citizens Committee to Save Elysian Park, Los Angeles
Los Angeles Unified School District
Neighborhood Information Network, Pasadena
Pasadena Heritage

Individuals

George W. Sabin

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DEPARTMENT OF
PUBLIC WORKS
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ENGINEERING
ROBERT S. HORII
CITY ENGINEER

650 SOUTH SPRING ST. SUITE 200
LOS ANGELES, CA 90014-1911

Mr. James Sowell, Manager
Environmental Compliance
Los Angeles Metropolitan Transportation Authority
818 West 7th Street, Suite 500
Los Angeles, CA 90017

MAY 09 1994

Dear Mr. Sowell,

METRO PASADENA PROJECT - DRAFT SUPPLEMENTAL ENVIRONMENTAL IMPACT REPORT - W.O. E1900042

We have completed our review of the Draft Supplemental Environmental Impact Report (SEIR) for this project. Please address the following comments in the Final SEIR:

1. The relocation of sanitary sewer at Marmion Way and Figueroa Street will have significant impacts on neighborhood traffic circulation, parking and private driveway access along the proposed route. This relocation route will include portions of Pasadena Avenue, French Avenue, Marmion Way, Loreto Street and Figueroa Street (see attached plan). Due to the magnitude of these impacts, the Mitigation Measures of the original EIR are inadequate and need to be augmented in the SEIR.
2. The SEIR mitigation of impacts to Marmion Way between Avenues 50-58 are inadequate. Mitigation Measures should include all improvements shown on the 85% Submittal Drawings for the Arroyo Seco to Los Angeles River - C6420 Contract.

Please refer any questions to Mike Stafford at (213) 847-5040 or Mark Chmielowiec at (213) 847-5042.

Sincerely,

Robert S. Horii
City Engineer

by *Gene D. McPherson*
Gene D. McPherson
District Engineer
Central Engineering District

MHS/MG-GG1-97
Enclosure

cc: Joe Kennedy, LADOT - STOP 599
Project Management Division, Attn: Karen Johnson - STOP 939
Dave Simpson, Utility Coordinator
Los Angeles Metropolitan Transportation Authority
P.O. Box 194, Los Angeles, CA 90053

ADDRESS ALL COMMUNICATIONS TO THE CITY ENGINEER

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RICHARD J. RIORDAN
MAYOR

**DEPARTMENT OF
PUBLIC WORKS
BUREAU OF
ENGINEERING
ROBERT S. HORN**
CITY ENGINEER

600 SOUTH SPRING ST., SUITE 800
LOS ANGELES, CA 90014-1911

Date: **MAY 09 1994**

Mr. James L. Sowell
Los Angeles County Metropolitan
Transportation Authority - Rail Construction
818 West 7th Street, Suite 300
Los Angeles, CA 90017

| | | | |
|--|--------------|------------|---------------|
| Post-It™ brand fax transmittal memo 7671 | | # of pages | 7 |
| To | James Sowell | From | Karin Johnson |
| Co. | | Co. | |
| Dept. | | Phone # | 847-8699 |
| Fax # | 244-6000 | Fax # | |

Dear Mr. Sowell:

**COMMENTS ON THE DRAFT SUPPLEMENTAL ENVIRONMENTAL IMPACT
REPORT (DSEIR) FOR THE PASADENA-LOS ANGELES RAIL TRANSIT PROJECT**

Thank you for the opportunity to comment on the above referenced document. The following comments have been prepared by staff of the Bureau of Engineering:

The DSEIR did not include a discussion of the impacts associated with the relocation of 14-, 18-, and 24-inch city trunk sewers in conjunction with the Figueroa Street at Marmion Way grade separation.

The DSEIR should include an analysis of additional impacts on traffic and the surrounding areas that would be associated with street vacations and utility relocations.

Please see the attached document entitled "Stormwater Considerations for CEQA Analyses" for information regarding stormwater permit requirements. Construction sites five or more acres in size require a stormwater permit if construction activities disturb soils.

As you are probably already aware, the City of Los Angeles Community Redevelopment Agency (CRA) is proposing to rehabilitate the Ziegler House (4601 North Figueroa Street), a City of Los Angeles Historic-Cultural Monument. The building will be used as a child care center. The CRA's proposal includes a small parking lot adjacent to the proposed Southwest Museum station. Plans for the Southwest Museum station and child care center should be coordinated.

If you have any questions, please contact Karin Johnson at (213) 847-8699.



Sincerely,

ROBERT S. HORII
City Engineer

By *Neil Brucher for*

STEPHEN B. HOUCK
Acting Division Engineer
Project Management Division

RSH/SBH/kj
A:let/blue

Attachment: Stormwater Considerations for CEQA Analyses

cc: **Ray Saldi, LD&M**
Stop 901

Mike Stafford, Central District
Stop 494

STORMWATER CONSIDERATIONS FOR CEQA ANALYSES

Introduction

Several items in the California Environmental Quality Act (CEQA) Initial Studies Checklist address potential impacts to stormwater¹. These items include: Section I, Earth, items (e) and (f); Section III, Water, items (a)(b)(c)(e)(g) and (i); and Section XVI, Utilities and Service Systems Item (e)².

Historically, analysis of stormwater impacts in CEQA documents has typically been limited to impacts to natural watercourses where riparian systems may experience adverse effects from the project, or to flood hazard effects of a project. Recent heightened public awareness of stormwater issues, including the heavy pollutant loads present in most urban runoff, indicates a need for more comprehensive and detailed consideration in CEQA analyses of impacts to stormwater, and for more attention to appropriate mitigation measures.

In addition to increased public awareness of stormwater issues, amendments to the Federal Water Pollution Control Act of 1972, commonly referred to as the Clean Water Act (CWA), established permit requirements for stormwater discharges from a variety of sources. This narrative has been prepared by the City of Los Angeles Bureau of Engineering to offer some guidance for CEQA analyses of stormwater impacts, and to summarize some of the stormwater permit requirements. Sources of additional information are included at the end of this document.

National Pollution Discharge Elimination System (NPDES)

Discharge of pollutants into waters of the United States via stormwater is prohibited by the CWA. Section 402 of the CWA sets forth the requirements for NPDES permits (required for most discharges into water bodies). Congressional reauthorization of the act in 1987 established the NPDES provisions governing stormwater discharges from municipal, industrial and commercial sites. NPDES permits for "non-point" discharges from these types of sites (such as sheet-flow off of a parking lot) are commonly referred to as "stormwater permits". In California the State Water Resources Control Board (SWRCB) has the authority to administer the NPDES program on behalf of the U.S. Environmental Protection Agency.

The SWRCB has issued "general" NPDES permits for construction activities and for certain types of industrial and commercial operations. Although it is possible to apply for an individual permit, the general permits reduce the amount of time and expense required to comply with the NPDES provisions of the Clean Water Act. In addition, an application for an individual permit may be denied, whereas coverage under the general permits is automatically assured if the permits' provisions are followed.

¹ Impacts to "stormwater" include the storm drainage infrastructure, flows carried within it, and the receiving water bodies (surface or subterranean).

² A revised Initial Study Checklist is included in the "Supplementary Information" section of the 1992 revision of the CEQA Guidelines that expands the old item XVI to include service systems as well as utilities, and to list six specific sub-categories, including sub-category (d), "Storm water drainage".

CITY OF LOS ANGELES

BUREAU OF ENGINEERING

General Construction Activity Stormwater Permit (GCASP)

A NPDES permit is required for construction activities that disturb soils, including clearing, grading, or excavation, if the total construction site is five or more acres in size. In general, the GCASP permits the stormwater discharges from a construction site, and prohibits non-stormwater discharges³ and any discharges containing reportable quantities of hazardous substances⁴. Permitted stormwater discharges are not restricted by numerical effluent limitations. Instead, dischargers are required to implement "appropriate pollution prevention control practices and/or Best Management Practices (BMPs)". Compliance with the GCASP consists of three basic steps.

First, a Notice of Intent (NOI) must be filed with the SWRCB in Sacramento, along with a \$250.00 filing fee⁵. The NOI notifies the state that the applicant intends to begin construction, and that they will comply with the provisions of the GCASP. The NOI must be filed before construction commences⁶. Filing of the NOI completes this step -- the SWRCB will not "approve" or "deny" the NOI. The GCASP must remain in force until construction is completed. Failure to comply with NPDES requirements can result in fines of \$25,000 per day of violation and imprisonment.

Secondly, a Stormwater Pollution Prevention Plan (SWPPP) must be prepared. This report must describe the construction site, identify potential sources of pollution and potential receptors, and describe the BMPs which will be used to control pollutants, both during construction, and post-construction. Within the context of CEQA, BMPs are roughly equivalent to mitigation measures. The SWPPP must be completed before construction commences. It is not necessary to file or seek approval of the SWPPP, however, the SWPPP must be available at the construction site at all times, and construction activities must follow the plan.

Lastly, at the completion of construction, a Notice of Termination must be filed with the SWRCB in Sacramento.

General Industrial Stormwater Permit (GISP)

A NPDES permit is required for certain types of industrial and commercial sites. In general, the types of activities which require permits are listed in 40 Code of Federal Regulations (CFR) Section 122.26(b)(14) (Federal Register, Volume 55, pages 48065-66). However, the Regional Water Quality Control Boards (RWQCBs) have the authority in California to require NPDES permits for any appropriate facility, regardless of the federal requirements.

Whereas the GCASP is oriented mostly towards short-term construction related impacts, the GISP addresses long-term operation of certain types of facilities. Compliance requirements are similar for both of the General Permits. The NOI for the GISP must be filed at least 30-days prior to operating new facilities. A SWPPP is also required. As with the GCASP, the primary focus

³ Although non-stormwater discharges are prohibited by the GCASP, exceptions are provided for certain discharges that are infeasible to eliminate, including: irrigation for erosion control, pipe flushing, street washing, and dewatering. Although these discharges are not prohibited, there are restrictions: BMPs must be utilized, water quality standards may not be violated, and other applicable permitting requirements must be observed (i.e. RWQCB permits for dewatering).

⁴ "Reportable quantities" of hazardous substances is specified in 40 CFR 117.3 and 1302.4.

⁵ The annual fee is \$250 in most of Los Angeles County, including all of the City of Los Angeles. In other parts of the state, which are not covered by a Municipal NPDES Permit, the annual fee is \$600.

⁶ There is no specified time limit for filing, other than "before" construction commences. The SWRCB will send a letter containing a discharge identification number to confirm their receipt of the NOI. To assure compliance, this letter should be received before construction commences.

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is on identifying and implementing BMPs to reduce/eliminate potential pollution of receiving waters. One major difference is a requirement in the GCASP to monitor the effectiveness of the BMPs by collecting and analyzing stormwater runoff from the site.

CEQA Analyses, BMPs, and Mitigation Measures

As with most potential impacts, stormwater impacts fall into two general categories: short-term construction related impacts, and long-term operational impacts. In most cases it should be possible to use BMPs to mitigate any potential short-term construction impacts so that they are not significant. There are also BMPs to address many long term impacts. In general, BMPs can be also be divided into two categories: structural, and non-structural. Whereas structural BMPs involve construction of a facility or device of some kind, non-structural BMPs focus on procedures and practices.

Short-term Construction Impacts and BMPs

For projects subject to the GCASP, proper compliance will mitigate most potential short-term impacts to acceptable levels. Any construction site contains a variety of materials which are potential sources of stormwater pollution. The other major source of stormwater pollution common to many construction sites is earth moving activities.

Categories of construction materials containing pollutants include: adhesives; cleaning agents; landscaping, plumbing, painting, heating/cooling, and masonry materials; floor and wall coverings; demolition debris; and construction equipment, vehicles, and maintenance supplies. Routine safety precautions for handling and storing toxic and hazardous materials may effectively mitigate the potential pollution of stormwater by these materials. These same types of common-sense, "good housekeeping" procedures can be extended to non-hazardous stormwater pollutants such as sawdust and other solid wastes.

The second major pollutant is sediment, typically produced by wind or water erosion. Grading and brush clearing activities can greatly increase erosional processes. Two general strategies should be used to mitigate erosion. First, BMPs should be designed and implemented to limit the amount of exposed soil and to control those areas which must be exposed. Trenching or grading activities should be phased so that trenches are backfilled, and graded areas are landscaped or otherwise covered, as quickly as practical. Appropriate dust suppression techniques, such as watering or tarping, should be used in areas which must be exposed. Secondly, the area should be secured to control off-site migration of pollutants. Many of the common mitigation measures for controlling fugitive dust emissions are also effective stormwater BMPs. Construction entrances should be designed to facilitate removal of debris from vehicles exiting the site, by passive means such as paved/gravelled roadbeds, and/or by active means such as truck washing facilities. Loads should be tarped. If necessary, roadways should be swept or washed down to prevent generation of fugitive dust by local vehicular traffic. Simple sediment filters should be constructed at or near the entrances to the storm drain system wherever feasible.

For construction sites of five or more acres, the required SWPPP will effectively address these types of impacts, and the appropriate BMPs. Although it is not required, a draft of the SWPPP can be included as an appendix to the CEQA document. This procedure can simplify the regulatory burden combining the development of CEQA-mandated mitigation measures with NPDES requirements to develop BMPs. Circulation will provide interested regulatory agencies with an opportunity to contribute constructive comments or indicate potential conflicts. At the very least, BMPs should be included in the Mitigation Monitoring/Reporting Plan within the final

CEQA document. For large projects, inclusion of BMPs in the projects plans or specifications will ensure that the contractor has been notified about required compliance procedures and avoid potentially costly change orders, delays, or penalties.

Long-term Operational Impacts and BMPs

Two basic areas of concern are stormwater quality, and quantity. BMPs that implement good housekeeping procedures, such as regular sweeping of paved areas, can be used to address quality concerns. BMPs that address design considerations, such as channeling runoff from paved areas into landscaped areas, can effectively address both quality and quantity considerations. In general it is desirable to: minimize the amount of paved area, use permeable types of paving materials whenever possible, design on-site drainage to move water into landscaped areas, and grade landscaped areas to maximize the retention of runoff.

The SWPPP for the GISP should also address issues relevant to the CEQA document, and identify BMPs that mitigate potential effects. However, since the main focus of the GISP is on stormwater quality, rather than quantity, it may be necessary to provide additional discussion of quantity issues in the CEQA document, beyond that contained in the SWPPP. Alternatively, BMPs oriented towards quantity control could be included in the SWPPP. As mentioned above, BMPs which limit the runoff generation from a project site often provide mitigation with respect to quality concerns as well.

Any increase in the ratio of impermeable to permeable surfaces at the site is likely to result in increased runoff. Much of the Los Angeles River, and other parts of the flood control system, are subject to flooding during design storms⁷. Therefore, an increase in runoff in one part of the drainage basin may contribute to flooding somewhere in the basin. As previously stated, thresholds of significance regarding stormwater impacts are poorly defined. However, regardless of the level of significance, the CEQA document should identify feasible mitigation measures (BMPs) available to maximize on-site retention/detention of stormwater. These BMPs can reduce the flooding potential by decreasing or shifting the timing of peak flows, and enhance runoff quality by allowing sediments to settle-out.

Summary

Federal NPDES stormwater permits are required for certain construction activities and industrial and commercial facilities. Compliance requires the development and implementation of BMPs to the maximum practical extent. Stormwater BMPs are functionally equivalent to CEQA mitigation measures. At this time there is very little clear guidance available to determine whether a project's impacts on stormwater are "significant". However, BMPs as required by the GISP and GCASP, and mitigation measures as required by CEQA have the same common objective of eliminating adverse impacts to the extent feasible. In most cases, a SWPPP which fulfills the NPDES permit requirements will provide an analysis of potential stormwater impacts and mitigation measures (BMPs), that are sufficient for CEQA purposes. BMPs that satisfactorily address NPDES permit standards regarding runoff will in most cases mitigate potential stormwater impacts to levels that are not significant. The time and expense required for regulatory compliance may be reduced by including a draft SWPPP in the CEQA document.

⁷ System deficiencies are identified in the Army Corps of Engineers Los Angeles County Drainage Area Review (December, 1991). For the Los Angeles River the Corps uses a "100-year" design storm. This is the theoretical storm event which has a statistical probability of occurring once in a 100 year period.

CITY OF LOS ANGELES

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References and Sources of Information***California Storm Water Best Management Practice Handbook(s)***

This is a series of three handbooks which address the three types of General NPDES permits available in California (Municipal, Construction, and Industrial). Each handbook includes detailed descriptions of BMPs. Prices range from \$12 to \$13, plus shipping and handling. To purchase one or more handbooks, contact:

Blue Print Service
1700 Jefferson Street
Oakland CA 94612

Phone (510) 444-6771
Fax (510) 444-1262

State Water Resources Control Board (SWRCB)

The SWRCB should be contacted if you have any questions about the GCASP or the GISP. Also, NOI's must be filed with the SWRCB.

State Water Resources Control Board
Division of Water Quality
Attention: Storm Water Permit Unit
P.O. Box 1977
Sacramento CA 95812-1977

Phone (916) 657-0918
Phone (916) 657-1145

Industrial Activities Stormwater Permits
Construction Activity Stormwater Permits

Regional Water Quality Control Board (RWQCB)

The RWQCB for the Los Angeles Region should be contacted regarding any specific water quality considerations.

California Regional Water Quality Control Board
Los Angeles Region
101 Centre Plaza Drive
Monterey Park CA 91754

Phone (213) 266-7500

City of Los Angeles Bureau of Engineering

For questions regarding CEQA documents and/or comments on this document:

Environmental Management Section
Attention: Stormwater Unit
650 South Spring Street, Ste 600
L.A. CA 90014-1815

Phone (213) 847-8519

For questions regarding the City's stormwater drainage infrastructure:

Central District (213) 847-8516
Harbor District (310) 548-7454
Valley District (818) 989-8431
West L.A. District (310) 575-8528

Carl Mills
Patrick Gibbons
George Groves
Henry Galle

For questions regarding the City's Municipal NPDES Permit:

Stormwater Management Division

(213) 847-6350

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City of Pasadena

100 NORTH GARFIELD AVENUE
P.O. BOX 7115, PASADENA, CA 91109-7215



ZONING AND SUBDIVISION
ADMINISTRATION
ANNEX 102

May 9, 1994

Mr. James L. Sowell,
Manager, Environmental Compliance
Los Angeles County Metropolitan Transportation Authority
818 W. 7th Street, Suite 500
Los Angeles, CA 90017

Dear Mr. Sowell:

Thank you for the opportunity to review and comment on the 2nd Draft SEIR for the Pasadena-Los Angeles Rail Transit Project. Comments on this document are directed primarily towards the impacts of the proposed 1,000 car park and ride facility in East Pasadena at either the Johnson and Johnson site or the former Builder's Emporium.

Since the project's impact on historic/cultural resources is a primary environmental impact affecting the City of Pasadena, as a preliminary to my comments portions of AB 2881 which became effective January 1, 1993 are quoted. AB 2881 addresses historical resources and the California Environmental Quality Act (CEQA). The 2nd Draft SEIR is inadequate because it does not consider alternatives at the Johnson and Johnson site to demolishing the structure.

Section 5021.1 of the Public Resources Code

(j) "Historical resource" includes, but is not limited to, any object, building, structure, site, area, place, record, or manuscript which is historically or archaeologically significant, or is significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California.

Section 21084.1 of the Public Resources Code with emphasis added.

A project that may cause a substantial adverse change in the significance of an historical resource, is a project that may have a significant effect on the environment. For purposes of this section, an historic resource is a resource listed, in or determined to be eligible for listing in, the California register of Historical Resources, historical resources included in a local reg-

ister of historical resources, as defined in subdivision (k) of Section 5020.1, or deemed significant pursuant criteria set forth in (g) of Section 5024.1, are presumed to be historically or culturally significant for the purposes of this section, unless the preponderance of evidence demonstrates that the resource is not historically or culturally significant. The fact that the resource is not listed in or determined to be eligible for listing in, the California Register of Historic Resources, not included in the local register of historical resources, or not deemed significant pursuant to criteria set forth in subdivision (g) of Section 5042.1 shall not preclude a lead agency from determining whether the resource may be an historical resource for purposes of this section.

Project Description

The project Description is inadequate as it does not describe the existing landscaping of the current site nor the layout, ingress, egress, and landscaping of the proposed park and ride facility at the Johnson and Johnson site. Further there is no discussion of a parking structure at the Builder's Emporium site. This site is much smaller than the Johnson and Johnson site and probably could not accommodate 1,000 surface parking spaces. The project description does mention that the park and ride facility will be lighted at night but mentions no shielding of light to prevent spillover on adjacent properties. There is also no discussion of how commuters would get from their cars to the station.

Impacts

Impacts from using the Johnson and Johnson site for a park and ride facility include but may not be limited to air, water, plant life, light and glare, land use, transportation/circulation and cultural resources. Impacts from using the Builder's Emporium site would probably involve possible impacts from building a parking structure which could have shade/shadow impacts. Due to the inadequate project description it is not possible to fully analyze all project impacts on the environment.

Air could be an impact if the existing structures and landscaping at the Johnson and Johnson site are removed and replaced with asphalt for 1,000 surface parking spaces. The absence of landscaping, the increased impermeable surface absorbing and reflecting sunlight and heat will increase the temperature on the site.

Water is an impact at the Johnson and Johnson site, due to the increase in impermeable surface and subsequent increase in water runoff. The quality of water run off would also be degraded by containing high amounts of oil derived residues from cars.

Plant life is an impact since it appears the landscaping will be removed at the Johnson and Johnson site. This landscaping is also part of the significance of the structure. It was designed by a well known landscape architect in cooperation with the architect of the building(s). As part of the park and ride

facility, there was no mention of any landscaping which could provide shade, help filter the car emissions and moderate the heat island effect of a large surface parking lot.

Light and glare can be an impact both from the absence of shade, if there is no structure, and absence of landscaping planned on the Johnson and Johnson site. There will be glare reflected off the parked cars. The night lighting may spillover onto adjacent uses. There was no discussion of shielding the night lighting or of lessening daytime glare from both the cars and the presumed open surface parking lot.

Land use is an impact since it does not appear that the proposed park and ride facility conforms with the intent of the newly adopted Land Use and Mobility Elements. The Johnson and Johnson site is in the E. Pasadena Specific Plan Area which encourages institutional (particularly child care), commercial and industrial uses. There is no mixed development proposed on the site using the existing structure and constructing a parking structure as an alternative to demolishing the existing building and landscaping. Various policies and objectives in the newly adopted elements encourage both transit and pedestrian oriented development. There appears to be no provision of any pedestrian amenities at either proposed park and ride site. Motorists would be pedestrians between their cars and their walk to the light rail station. Would commuters walking from home or bus stops be accessing the light rail station through the park and ride facility?

Transportation/circulation is a possible impact since transfers between different modes of transportation are not adequately discussed.

Cultural resources is an impact if the Johnson and Johnson structure and landscaping is demolished and if the Craftsmen houses in Highland Park are demolished. No alternatives to clearing the Johnson and Johnson site and still using the site for a park and ride facility were discussed.

I have attached staff comments from both the Traffic Engineer and the Light Rail Project Coordinator of the City's Transportation Division of the Public Works and Transportation Department.

If you have any questions regarding my comments, I may be reached at the Current Planning Section of the Planning and Permitting Department, (818) 405-4152. If you have questions regarding the comments of the Traffic Engineer, please contact Keil Maberry, Associate Traffic Engineer at (818) 405-4191. If you have any questions regarding the comments of the Light Rail Project Manager, please contact John Jontig at (818) 577-6134.

Sincerely,

Nancy B. Key

Nancy B. Key, AICP
Sr. Planner

- CC: Denver Miller, Environmental Administrator-Current Planning
- Jeff Cronin, Principal Planner-Design
& Historic Preservation
- John Jontig, Light Rail Manager-
Works & Transportation Dept.
- Minder Day, Principal Traffic Engineer-Public Works & Trans-
portation Dept.
- Laura Dahl, Sr. Planner-Advance Planning
- Keil Maberry, Assoc. Traffic Engineer -
Public Works & Transportation Dept.

ltrailr.sei 5.9.94

DRAFT

**MEMORANDUM - CITY OF PASADENA
Public Works and Transportation Department**

DATE: May 9, 1994

TO: Nancy Key
Senior Planner, Environmental
Current Planning

FROM: John Jontig

RE: SEIR - PASADENA-LOS ANGELES LIGHT RAIL TRANSIT PROJECT

Pasadena Light Rail Project staff has reviewed the SEIR for the Pasadena-Los Angeles Light Rail Transit Project.

1. The City of Pasadena prefers and recommends the J & J-Merck site for station access and park and ride garage for the station at Sierra Madre Villa. The former Builders Emporium site is now occupied by a new business, Orchard Hardware Supply, and is believed to have an unwilling seller. Condemnation costs plus relocation of a major business would prove to be prohibitive.
2. The Los Angeles to east Pasadena Light Rail Transit Project is the first phase of what is expected to be light rail service east to Irwindale or Azusa within or adjacent to the 210 Foothill Freeway corridor. The requirement of a 1000 car park and ride garage is so sized as the Sierra Madre Villa location will be the interim terminal station.

The City requests that the SEIR consider any environmental impacts to the Sierra Madre Villa site that would occur if the 1000 car park and ride garage were reduced in size due to the relocation of the light rail terminal to the east.

There is information (MTA preliminary surface parking drawing) that indicates the MTA may intend to take two parcels (A and B) in addition to the J & J-Merck property at the Sierra Madre Villa site.

Parcel A at the corner of Foothill Boulevard and Halstead Street contains a business that has recently spent a great deal of money in upgrading the property and business. It would be environmentally detrimental to replace an upgraded building and business with surface parking.

Nancy Key
May 9, 1994
Page 2

It is the City's understanding that the property owner is unwilling to sell thus a take by condemnation would be required. That action would be very costly to the MTA to cover property, business and relocation costs. A garage structure appears to be environmentally and financially sound.

3. The City is concerned about the possible problems caused by horn and operational noise of light rail transit in residential neighborhoods along the alignment including some within Pasadena. There is particular interest in horn sounds reverberating in parts of the City. The frequency and sound quality of the horns is also of concern. The City would like to continue to work with the MTA on mitigation efforts to reduce noise problems. We request that the SEIR address these environmental concerns.
4. Pasadena Traffic Engineering staff has reviewed the Transportation and Circulation portion of the SEIR for the Pasadena-Los Angeles Light Rail Transit Project. Staff will only comment on the Sierra Madre Villa Park and Ride Facility. The following are staff's comments:

While the mitigation provided in the SEIR appears to meet the requirements of the City of Pasadena it is recommended that the mitigations be revised as follows to ensure they appropriately address the traffic mitigations to the Foothill Boulevard traffic. Traffic control signals will have to be modified at the impacted intersections in order to make the mitigations work.

SECTION 4.7.5.2: SIERRA MADRE VILLA PARK AND RIDE: Staff agrees with the analysis for determining which intersections will be significantly impacted by this project. Several mitigation measures will have to be revised as follows:

1. **Halstead Street and Foothill Boulevard:** The mitigation recommended is not applicable to the needs of the Light Rail Park and Ride Facility. Beginning with the second sentence, the paragraph should be revised to read *"This can be accomplished by widening Halstead Street four feet from Foothill Boulevard south to the cul-de-sac to provide dual northbound left-turn lanes including protected left-turn signal phases for all directions and restriping the southbound approach to provide an exclusive right-turn lane. The eastbound approach should be restriped to provide for a minimum 100 foot long exclusive right-turn lane. The eastbound approach should be restriped to provide for a minimum 100 foot long exclusive right-turn lane. This will require removing some parking along the south side of Foothill Boulevard. Signal timing changes and detector placements should be considered at the time of restriping."* The ICU calculations should be revised to show this mitigation (use 2880 vehicles/hour capacity for the dual left-turn).

- 2. I-210 West-Bound Ramps and Sierra Madre Villa Avenue: Parking management may create a reduction during the peak periods, but for the purpose of providing quantitative mitigation, the mitigation should be to provide dual northbound left-turn lanes onto the I-210 Freeway.

Nancy Key
 May 9, 1994
 Page 3

GENERAL COMMENT: The intersection of Rosemead Boulevard and Colorado Boulevard is not in the City of Pasadena and should be reviewed the County of Los Angeles. As a comment regarding the recommended mitigation, providing an additional through lane is only valid when the new lane can be carried for a considerable distance in order to truly provide additional link capacity.

JOHN JONTIG
 Light Rail Project Manager

JJ:SP
 KEY:SELK

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City of Pasadena

100 NORTH GARFIELD AVENUE
P.O. BOX 7115, PASADENA, CA 91109-7215



ZONING AND SUBDIVISION
ADMINISTRATION
ROOM 102

May 9, 1994

Mr. James L. Sowell,
Manager, Environmental Compliance
Los Angeles County Metropolitan Transportation Authority
818 W. 7th Street, Suite 500
Los Angeles, CA 90017

Dear Mr. Sowell:

I have attached comments from the City's Cultural Heritage Commission, Design Commission and Transportation Advisory Commission.

If you have any questions regarding the comments of the Design or Cultural Heritage Commissions please contact Jeffrey Cronin, Principal Planner of the Design and Historic Preservation Section of the Planning and Permitting Department, (818) 405-4228. If you have any questions regarding the comments of the Transportation Advisory Commission, please contact Terri Slimmer, Transportation Coordinator at (818) 405-4191.

Sincerely,

Nancy B. Key

Nancy B. Key, AICP
Sr. Planner

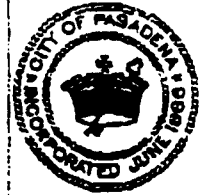
CC: Denver Miller, Environmental Administrator-Current Planning
Jeff Cronin, Principal Planner-Design
& Historic Preservation
Mary Jo Winder, Sr. Planner-
Design & Historic Preservation
Brad Smith, Sr. Planner-
Design & Historic Preservation
Terri Slimmer, Transportation Coordinator
Public Works & Transportation Dept.

ltrailc.sei 5.9.94

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City of Pasadena

100 NORTH GARFIELD AVENUE
P.O. BOX 7115, PASADENA, CA 91109-7215



URBAN CONSERVATION
ROOM 111
(916) 405-4328

Memorandum

TO: Los Angeles County Metropolitan Transit Authority Environmental
Compliance Office
From: City of Pasadena Cultural Heritage Commission
Subject: Draft Supplemental Environmental Impact Report Pasadena-Los Angeles
Light Rail Project
Date: April 19, 1994

At a public meeting held on April 18, the Cultural Heritage Commission reviewed the draft supplemental environmental impact report for the Pasadena-Los Angeles Light Rail Project and voted unanimously to forward the following statement and list of concerns to the Los Angeles County Metropolitan Transit Authority.

We have read and reviewed with great concern the Draft Supplemental Environmental Impact Report (DSEIR) for the Los Angeles-Pasadena Light Rail Project, especially those sections pertaining to the creation and location of the East Pasadena Park-and-Ride Facility. The major area of concern is the proposed demolition of the Johnson & Johnson/Merck Building, historically known as the Stuart Pharmaceutical Building.

The Cultural Heritage Commission unanimously supports the retention and preservation of the Stuart Pharmaceutical Building. Furthermore, this recommendation is based on the historical and cultural significance to the City of Pasadena, and the strong belief that the historically significant portions of the building can be adaptively used to the betterment of the design and function of the proposed light rail station and retain this site as a cultural resource in the East Pasadena community.

Nationally, when we look at interstate travel - and intrastate travel within California - railroad and light rail stations have become transportation centers, creating an active area and synergy that extend beyond the movement of the trains. While not initially used as a train station, the Stuart Building offers the opportunity to establish a similar setting for the East Pasadena site. With an internationally acclaimed building, the MTA has the possibility, if not the mandate, to provide the community with something more than a vast "sea of asphalt and automobiles."

The adaptive reuse of the building will provide additional business uses, extend the hours of the building, create interest in light rail, provide a more celebratory travel experience, and maintain an asset to the city of national significance.

The DSEIR identifies the Johnson and Johnson/Merck Building as a cultural resource; however, it errors greatly in proposing mitigation measures for the loss of such an important building. And, the DSEIR offers no alternative to demolition, despite existing real estate studies offering many options.

In closing we urge that MTA not only consider the reuse of the building, but review existing adaptive re-use studies. With the use of the Santa Fe Depot and the Stuart Building, the City of Pasadena would have two great transportation centers. These two centers will reflect the growth of the city from an early resort center to a high-tech industrial center for the space age. The East Pasadena area would retain a landmark and community asset and the light rail would have wonderful entrance to the city.

Specifically, our concerns with the DSEIR are:

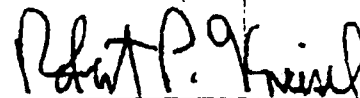
1. [Pg. 2-5, 4-96] Demolition of the Johnson & Johnson/Merck building (historic name: Stuart Pharmaceutical Company) at 3360 East Foothill Boulevard, Pasadena, would be a significant unavoidable environmental effect that could not be mitigated to a level of insignificance by photography, measured drawings, and oral histories. The demolition should be listed on pg. 5-1 under the category of significant unavoidable environmental effects.
2. [Pg. 4-89] The paragraph describing the work of Edward Durell Stone has inaccuracies (e.g., "rare example of the New Formalism style of architecture," "industrial architecture," Waldorf-Astoria Hotel).
3. [Pg. 4-90] Pasadena Heritage, a private community organization, *not* the Cultural Heritage Commission, has nominated the Johnson & Johnson & Johnson/Merck building for listing in the National Register of Historic Places.
4. [Pg. 4-16, 4-92] Under air quality, the environmental analysis identifies the demolition of a "maximum of seven buildings at the proposed Johnson & Johnson/Merck site" and describes demolition of seven buildings as a "worst case scenario." Subsequently, under cultural resources, the report notes - unequivocally - "all of the buildings would be subject to demolition." Which statement is correct?
5. A decision about the National Register nomination is not the only measurement of the significance (or "status") of the Johnson & Johnson/Merck building (and findings of "exceptional significance," well beyond the thresholds for the California Environmental Quality Act, are required to list a cultural resource under fifty years old in the National Register). In 1992, the City of Pasadena's Cultural Heritage Commission determined that the building met the criteria for designation as a City "treasure" (a higher category of local landmark). Moreover, two extensively researched reports and numerous letters from scholars across the country attest to the importance of the building.

Given this evidence, the Commission disagrees with the conclusion that a "conservative approach" to mitigation is necessary only while the National Register nomination is pending.

The mitigation plan cannot be linked to the possibility of actual "listing" in the Register. The building will *not* be listed in the Register because the property owners have formally objected to the nomination. At this point, the State Historical Resources Commission may only forward a recommendation to the National Park Service, the agency which ultimately determines eligibility for listing.

6. The report does not consider alternatives to the proposed demolition of the building at 3360 E. Foothill Blvd. According to the Public Resources Code of the State of California (California Environmental Quality Act, Sec. 15126), an EIR should discuss "a range of reasonable alternatives to the project...[including] alternatives capable of eliminating any significant adverse environmental effects or reducing them to a level of insignificance, even if these alternatives would impede to some degree the attainment of the project objectives, or would be more costly." The report apparently considers the site formerly occupied by Builder's Emporium as the alternative project. Yet, it omits any discussion of adaptive reuse of the Johnson & Johnson/Merck building or of constructing a multi-level parking structure as an alternative to surface parking.
7. Until release of the supplemental EIR, the understanding of the Commission was that the Metropolitan Transit Authority would explore adaptive reuse of the historic building. A March 1993 adaptive reuse study of the site (by Halcyon Real Estate Advisors/Ernst & Young) considered eight options. Two of these options proposed integrating the historic building into new development accompanying the Sierra Madre Villa light rail station. This study recognizes that adaptive reuse of the building in connection with a light rail station would be difficult because of "surface traffic issues," but no analysis of adaptive reuse or the obstacles posed by traffic circulation are included in the EIR.
8. [Pg. 4-82] The locations of sound barrier walls within Pasadena are not identified in the report. At heights of four or eight feet, these walls could have an adverse visual impact on historic resources (especially if proposed for locations within the Old Pasadena National Register District).

Respectfully,



Robert Kneisel, Chair

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City of Pasadena

100 NORTH GARFIELD AVENUE
PASADENA, CA 91109-7215



PLANNING DIVISION
URBAN CONSERVATION SECTION
CITY HALL, ROOM 111
(818) 463-4600
818 463-6808 FAX
(818) 463-4371 (TDD)

MEMORANDUM

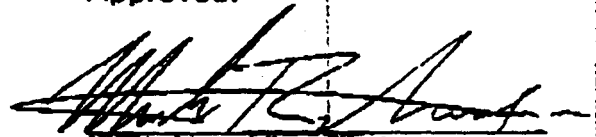
TO: Metropolitan Transportation Authority Environmental Compliance Office
FROM: Design Commission, City of Pasadena
RE: Comments on Draft Supplemental Environmental Impact Report,
Pasadena-Los Angeles Light Rail Project
DATE: April 27, 1994

On April 25, 1994, the Design Commission reviewed portions of the draft supplemental EIR (dated March 25, 1994) relating to the City of Pasadena. The Commission subsequently voted to forward the following comments and recommendations to the City Council and to the Metropolitan Transportation Authority:

1. [Pg. 1-7] The supplemental EIR contends that the light rail project would have no significant effects on plant life, light and glare, and aesthetics. The introduction of a surface parking lot for 1,000 cars at the Sierra Madre Villa station, however, would have potentially significant effects on plant life, light and glare, and aesthetics. The parking facility, for example, would affect plant life by removing mature landscaping on the grounds of the Johnson & Johnson/Merck building. Among the notable plant life on these grounds are Mediterranean fan palms and cypress trees, orange trees, and olive trees. The illumination of 10 acres of surface parking might cause substantial light and glare, and nine acres of surface parking would visually degrade the area.
2. [Pg. 2-5, 4-96] Demolition of the Johnson & Johnson/Merck building (historic name: Stuart Pharmaceutical Company) at 3360 E. Foothill Boulevard, Pasadena, would be a significant unavoidable environmental effect that could not be mitigated to a level of insignificance by photography, measured drawings, and oral histories. The demolition should be listed on pg. 5-1 under the category of significant unavoidable environmental effects. The building and its grounds are a noted work of the internationally renowned architect, Edward Durrell Stone (1902-1978), and the distinguished landscape architect, Thomas D. Church (1902-1978).

3. [Pg. 3-10] The report indicates that the Sierra Madre Villa park-and-ride facility requires 1,000 spaces. It does not, however, describe the facility in any further detail. Previous studies from the Metropolitan Transportation Authority proposed (for the Johnson & Johnson/Merck site) a three-story or five-story parking structure adjacent to the Foothill Freeway. An alternative study proposes a nine-acre, surface parking lot. Without a physical description of the park-and-ride facility, no assessment of environmental effects, (notably the three concerns previously cited) is possible.
4. [Pg. 4-16, 4-92] Under air quality, the environmental analysis identifies the demolition of a "maximum of seven buildings at the proposed Johnson & Johnson/Merck site" and describes demolition of seven buildings as a "worst case scenario." Subsequently, under cultural resources, the report notes - unequivocally - "all of the buildings would be subject to demolition." Which statement is correct?
5. The report does *not* consider alternatives to the proposed demolition of the building at 3360 E. Foothill Blvd. According to the Public Resources Code of the State of California (California Environmental Quality Act, Sec. 15126), an EIR should discuss "a range of reasonable alternatives to the project....[Including] alternatives capable of eliminating any significant adverse environmental effects or reducing them to a level of insignificance, even if these alternatives would impede to some degree the attainment of the project objectives, or would be more costly." The report apparently considers the site formerly occupied by Bullder's Emporium as the alternative project. Yet, it omits any discussion of adaptive reuse of the Johnson & Johnson/Merck building or of constructing a multi-level parking structure as an alternative to surface parking.
6. [Pg. 4-82] The locations (if any) of sound barrier walls within Pasadena are not identified in the report. At heights of four or eight feet, these walls could have an adverse visual impact on the visual character of the light rail corridor.

Approved:



Mark Nay, Vice Chair

DRAFT

City of Pasadena

100 NORTH GARFIELD AVENUE
 P.O. BOX 7115, PASADENA, CA 91109-7215
 Transportation Advisory Commission



PUBLIC WORKS AND TRANSPORTATION DEPARTMENT

(916) 405-4191

May 9, 1994

Mr. James L. Sowell
 Manager
 Environmental Compliance
 Los Angeles County
 Metropolitan Transportation Authority
 P. O. Box 194
 Los Angeles, CA 90053

**RE: DRAFT SUPPLEMENTAL ENVIRONMENTAL IMPACT REPORT PASADENA-
 LOS ANGELES LIGHT RAIL TRANSIT PROJECT**

Dear Mr. Sowell:

The City of Pasadena Transportation Advisory Commission has reviewed the Supplemental Environmental Impact Report for the Los Angeles-Pasadena Light Rail Project.

At the Commission's public meeting held on April 14, 1984 the following comments were adapted as part of the record of proceedings:

1. Park and Ride Facility at Foothill Boulevard and Sierra Madre Villa:
 The report was general in nature and did not disclose what type of facility was to be located at the site. The Commission had information that indicated a 1000 car surface lot was to be built at this site. The Commission feels this is not appropriate for the site and would be environmentally detrimental to the area. The expected garage on the southern section of the site, next to the freeway, would be reasonable and appropriate to the site.

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Mr. James L. Sowell

May 9, 1994

Page 2

2. Builders Emporium Site:

The former Builders Emporium site is no longer available; as the site and building have been modified for a new tenant, Orchard Hardware Supply.

Sincerely,

ROBERT HUDDY

Chairman

Transportation Advisory Commission



CITY OF SOUTH PASADENA

1414 Mission Street • South Pasadena • California 91030
TEL (818) 799-9101 • FAX (818) 799-1109

262071 MAY-6 8

KENNETH C. FARFSING
CITY MANAGER

James L. Sowell, Manager
Environmental Compliance
Los Angeles County
Metropolitan Transportation Authority
818 West Seventh Street, Suite 800
Los Angeles, California 90017

**RE: DRAFT SUPPLEMENTAL ENVIRONMENTAL IMPACT REPORT -
PASADENA - LOS ANGELES LIGHT RAIL TRANSIT PROJECT**

Dear Mr. Sowell:

The City of South Pasadena has completed its review of the Draft SEIR for the Pasadena Blue Line. Our comments are based on review of the document and our letter of December 22, 1993, commenting on the Notice of Preparation. We are disappointed that the draft SEIR has ignored the concerns of the City of South Pasadena.

RCC and MTA staff met with the City of South Pasadena on March 12, 1994. We walked the entire alignment and discovered several project related impacts which are not discussed in this document or any of the previous environmental documents. The draft appears only to discuss changes in Pasadena, Highland Park and the Midway Yard.

NOISE WALLS - There were several noise walls which did not make any apparent sense. Sections of walls were adjacent to commercial and industrial property, where they are clearly not necessary. There were several houses immediately adjacent to the alignment with no sound walls. Arroyo Vista School requires focussed sound studies.

I am transmitting with this letter exhibits which indicate the correct locations of noise walls. Please include these exhibits in the SEIR as the required mitigation measure for the areas within the City of South Pasadena.

HORN NOISE - RCC and MTA staff met with the City of South Pasadena on April 25, 1994 to discuss the horn noise situation and wayside horn system. We were given a copy of an April 6, 1994 study of a wayside horn system. The draft SEIR should include this study. The SEIR should also state the current progress of the design of the electronic car horn.



James L. Sowell
Re: Draft SEIR - Pasadena/Los Angeles
Light Rail Transit Project
May 5, 1994

Page 2

The SEIR should include the following mitigation measures for horn noise:

1. The MTA/RCC will continue to develop the wayside horn system. Cities along the corridor will continue to be consulted on the development and implementation of the wayside horn system.
2. The RCC/MTA will use good faith efforts to seek approval of the wayside horn system from the Public Utilities Commission. RCC/MTA staff shall continue to work with PUC staff in the development and testing of the wayside horn system.
3. MTA/RCC will continue to develop and implement the electronic car horn. Cities along the corridor will be consulted on the car horn noise issue. MTA/RCC will work with the cities on the duration, pitch and other horn variables prior to the implementation of the car horns.

TRACTION POWER STATIONS - Neither this Draft SEIR nor previous documents discuss the potential historic resource losses due to the traction power station at 1111 Magnolia Street. The property has one of the original Rancho Santa Fe homes, which is currently proposed for demolition by the RCC.

The following mitigation measures should be incorporated into the draft SEIR:

1. RCC staff shall notify the City of South Pasadena six months prior to the proposed demolition of the residence located at 1111 Magnolia Street.
2. RCC staff shall permit the City of South Pasadena to relocate the home within the six-month period. RCC shall sell the residence at a nominal value to the City.
3. All heritage trees and significant trees shall be retained on the traction power station sites. These trees shall be integrated into the final landscape development plans for the site.

James L. Sowell
Re: Draft SEIR - Pasadena/Los Angeles
Light Rail Transit Project
May 5, 1994

Page 3

Please include these comments and mitigation measures in the Draft SEIR. The City respectfully requests a copy of the Notice of Completion in order that we may exercise our rights under CEQA in a timely manner.

If you have any questions regarding this matter, please do not hesitate to contact me.

Sincerely,



Kenneth C. Farfsing
City Manager

KCF:smh
att: Noise Wall Exhibits

cc: City Council
Blue Line Committee
Laurence Weldon
Jim Van Winkle
Horn Noise Working Group

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State of California

Business, Transportation and Housing Agency

Memorandum

L.A.C.M.T.A.

Mr. Mark Goss
 State Clearinghouse
 1400 Tenth Street, Room 121
 Sacramento, CA 95814

ISSN MAY - 2 1994

Date 48

April 29, 1994

File No.:

IGR/CEQA/SEIR
 LA County MTA
 Pasadena-LA
 Light Rail
 Transit Project
 Vic LA-110-VAR
 LA-210-VAR

From : Wilford Melton - District 7
 DEPARTMENT OF TRANSPORTATION

Subject: Project Review Comments

SCH No. 93121029

Caltrans has reviewed the above referenced document. It analyzes project modifications proposed since the adoption of the final project. Based on the information received, we have the following comments:

On Page 2-5, Table 2.2-1, Transportation and Circulation - the contra-flow lane proposed as a mitigation measure for access to the E/B I-210 from the Johnson & Johnson parking site will have significant traffic impacts on state facilities. Early coordination with Caltrans is recommended.

On Page 3-10, Section 3.3.7, the description should include the proposed contra-flow lane arrangement as a mitigation measure for traffic circulation impacts for access to the E/B I-210 from the Johnson & Johnson parking site.

On page 4-59, Section 4.7.2, for projected traffic volumes for the on and off-ramps at the Sierra Madre Villa intersection, Caltrans criteria needs to be considered if it gives larger volumes.

Thank you for this opportunity to comment. If you have any questions regarding this response, please call me at (213) 897-1338.

Original signed by

WILFORD MELTON
 Senior Transportation Planner
 IGR/CEQA Coordinator
 Advance Planning Branch

✓ cc: Harley S. Martin
 LACMTA
 818 W. 7th. Street
 Los Angeles, CA 90017

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ADDRESS ALL COMMUNICATIONS
TO THE COMMISSION
107 SOUTH BROADWAY, ROOM 8108
LOS ANGELES, CA 90012
TELEPHONE: (213) 897-

L.A.C.M.T.A.

Public Utilities Commission

STATE OF CALIFORNIA

1994 APR 28 11:09 37

FILE NO.

April 28, 1994

Mr. James L. Sowell
LACMTA
818 W. 7th Street, Suite 300
Los Angeles, CA 90017

Subject: CPUC Staff Comments on the Draft Supplemental
Environmental Impact Report Pasadena-Los Angeles Light
Rail Transit Project

Dear Mr. Sowell:

The subject document has been reviewed by the Commission staff and we have no outstanding safety concerns at this time. We do note however on page 3-4, section 3.3.4.3 that reference is made to a switchyard operated by AT&SF. The Midway Yard is actually operated by SPTC.

Please feel free to directly contact Susan Feyl at 213-897-3546 if you have any questions concerning this matter.

Very truly yours,

DONALD R. JOHNSON
Supervising Engineer
Rail Transit Safety Branch
Safety Division

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JOHN CALDWELL DESIGN

Product and Graphic Design

COPY IN RMC

260551

TRANSMITTAL

L.A.C.M.T.A.

Please deliver the following page(s) to:

1994 APR 13 AM 10:44

Name: Mr. James S. Sowell, Manager
Company: Los Angeles County Metropolitan Transit Authority
From: John W. Caldwell
Date: April 12, 1994
Subject: The South Pasadena Light Rail parking

Message: Dear Mr. Sowell:

I'm the owner of the property and the business located at the address below, for the past 15 years.

My concern is parking. The last few years parking availability on El Centro has diminished; now, it is almost non-existent. Therefore, the Park and Ride locations that are being considered in the area are a must.

Limiting parking hours, to discourage Park and Ride from using up on-street parking, is being considered by the South Pasadena Planning Committee and Light Rail, thereby protecting retail, commercial and residential parking. This is imperative. I have suggested to Bill Campbell of the South Pasadena Planning Department and now to your office, that there be no parking between 6:00 A.M. and 9 A.M. Monday thru Friday in the area surrounding the Light Rail station. This would discourage Park and Ride all day parking. This would cause fewer inconveniences for businesses and residents than the proposed two hour parking limit in the area which is being considered.

In any event, I am a supporter of Light Rail and thank you for your consideration on this issue. If I can be of any service on any of your committees, I would be happy to do so.

Best Regards,

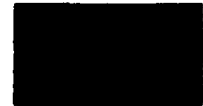


John W. Caldwell

901 El Centro Street
South Pasadena
California 91030-3115
Phone (213) 682-2809
Fax (818) 799-9615

JCD

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**KEVIN MICHAEL
STUDIO**

L.A.C.M.T.A.

1994 APR 28 AM 10:53

April 26, 1994

Mr. Harley Martin
Metropolitan Transportation Authority
818 West 7th Street
Los Angeles, California 90017

Dear Harley:

Our business has just relocated to 3400 East Foothill in Pasadena, immediately next door to the Johnson & Johnson building proposed as a potential location for the final stop of the Pasadena Blue Line trolley.

Because I am extremely concerned as to the impact this will have on our business, I would appreciate any and all information pertinent to this destination, such as:

1. What will the site look like? A large parking lot and/or train station?
2. Where will passengers be going or coming from?
3. The asking price of that property is high. Why would the MTA need such a large and expensive piece of property anyway?

I would certainly appreciate your comments and concern. Please also advise us as to further information you may have as it develops.

Respectfully,

Kevin Sweeten

/kms

3400 EAST FOOTHILL BOULEVARD
PASADENA, CALIFORNIA 91107
818-585-8000



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2630 Lacy Street
Los Angeles, CA 90031

(213) 222-8872
FAX (213) 222-1258

94 MAY 6 P4:05

LACY STREET PRODUCTION CENTER



DATE: May 4, 1994 ✓

TO: Harley Martin, Los Angeles County Metropolitan Transit Authority (MTA/RCC), Environmental Compliance

FROM: King Patrick Leonard, AICP ASLA
Lacy Street Production Studios *[Signature]*

SUBJECT: Response to Draft Supplemental Environmental Impact Report, Pasadena - Los Angeles Light Rail Transit Project (Pasadena Blue Line), SCE # 93121099

In a continuing spirit of cooperation, and on behalf of the Lacy Street Production Center (studios) I offer the following comments regarding SCE #93121099 (SEIR).

The Lacy Street Production Center studios are located at 2630 Lacy Street in the Lincoln Heights neighborhood of Los Angeles. The studios are located directly across from the Los Angeles City Animal Shelter and parking facilities. Approximately 463 feet of the southerly portion of the facilities are adjacent to the proposed Pasadena Blue Line Project. The distance of buildings to the nearest rail line varies from 15-33 feet. Figure 1 shows the general location and layout of the studios with respect to the existing rail line and the proposed 26th Street Station.

As we have indicated in the past to your project staff, the studios are an important part of the Lincoln Heights community as well as the film industry in general. There are approximately 98,000 people employed in the film industry within the Los Angeles area. Over 10% of these people work at some time during the year within the Lacy Street Production Center. Several thousand additional people provide catering services, construction services and related services. In 1993 alone the studios were utilized by 130 production companies. Films, MTV productions, commercial films, and media presentations are prepared at the studios. The studio is the largest employment center in the East Los Angeles/Lincoln Heights area. The studio complex is unique in that there are only 17 film studios remaining in the Los Angeles metropolitan area, none of which have the unique architectural characteristics of the Lacy Street studios. Additionally, other studios in the region have been impacted severely by recent earthquake activity, however the Lacy Street Production Center has continued to operate 24 hours a day, 7 days a week to offset some of the demand that has been

placed upon the facilities as the result of the loss of other facilities for filming in the area. Consequently, our concerns are both unique and significant to the Pasadena Blue Line development process.

In the Initial Study for this SEIR, the Lacy Street facilities are generally described as being in the vicinity of Marmion Way. Previous environmental impact reports have incorrectly identified the studios as "Orion Pictures". Section 4 of this Draft SEIR identifies "Orion Pictures" and the facilities generally as "Railroad Industrial". We wish to point out that Orion Pictures was simply a lessee of the facilities at the time the Cagney & Lacey television series was being filmed, but the ownership was at that time, and continues to be, the present owners. Similar to The Alien Nation series filmed here by Fox Studios, the facilities were leased in large part by a single company. This was unusual for us to do this but both of these productions required most of the studio facilities in order to continually prepare features on a weekly basis. Figure 2 provides a general idea of how the facilities were being utilized at the end of 1993. Like most studios we continually change the stage areas and improve them each time they are used for different film productions. Because the California Environmental Quality Act (CEQA) review process for the Pasadena Blue Line has been going on since 1988, it is difficult for MTA/RCC staff and their consultants to keep up with the numerous changes that occur throughout the studios as well as the neighborhood.

Our comments are structured so as to:

1. Identify potential project impacts upon the studios and filming activities.
2. Describe the need for mitigation for specific and unique impacts that the Pasadena Blue Line Project will have upon the studios both during construction and in the operational stages.
3. Suggest mitigation measures to assure that uninterrupted filming can continue.
4. Suggest ways to incorporate mitigation measures into the required Mitigation Monitoring Plan.
5. Provide a summary of previous actions and comments by Lacy Street Production Center that have been provided to MTA/RCC staff regarding the Pasadena Blue Line Project. We noted that much of the significant work we have completed in acoustical analysis was not mentioned in this Draft SEIR, and this type of new information should be a part of the CEQA process.

MEMO - May 4, 1994

Our evaluation of this Draft SEIR was hampered by missing information, missing references and inconsistency between various CEQA documents prepared over an extended period of time. Unfortunately this kind of CEQA process, extended over such a long period of time, causes some confusion for the public, including ourselves, in evaluating the documents and precise impacts upon the studios. However, we have tried to focus on those areas that are most pertinent to the studios as opposed to some of our earlier comments which focused upon neighborhood concerns. We continue to believe that at the project level this kind of SEIR should be focusing upon the numerous public improvements required to support such a massive project as the Pasadena Blue Line. The SEIR appears to suffer from the implication that only the project is important and not the land uses and other public improvements needed to support the project. For these reasons we believe the scope of this document is inadequate to address many of the concerns we have previously indicated to you as well as the project level kinds of decisions that must be made in the near future if this project is to be developed in the time frame anticipated. We understand from the staff that the time frame has been moved forward for one year. We hope to be able to provide you with additional comments and suggestions in this extended time frame to deal with the more complex issues of the drainage, street right of way issues, pedestrian safety, visibility from vehicles, and architectural treatment around the 26th Street Station area.

We noted certain information missing from this document, such as the proposed electrical booster station which is now proposed to the east of our facilities. Originally we thought this facility would be to the south of our facilities and was sufficient distance from the studios so as not to be a significant impact. We believe that this general problem of the electrical booster stations and the noise levels emitted from such facilities has not been focused on in this SEIR at a time when property purchases are eminent. We note that the State Supreme Court has held that the notice requirements of CEQA, while sufficient to encourage general public participation in the environmental decision making process, are inadequate to meet due process standards for notice on the underlying project(s) where fundamental interests are substantially affected.

In some instances booster stations may require different zoning or a conditional use permit, depending upon the jurisdiction. We noted no analysis of jurisdictional requirements for these types of discretionary decisions and wondered if MTA/RCC were required to meet any such standards. At a minimum, the SEIR should address the design standards and noise/acoustical improvements that could be

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provided to mitigate impact of these booster stations. We believe that putting a booster station adjacent to a film studio creates very significant impacts that should be mitigated and that should be reflected in a Mitigation Monitoring Plan.

In the general section on noise and vibration we noted that Section 4.4.2, again needs clarification as to "Orion Pictures" and "Railroad Industrial". At a minimum the studios should be called out as a designated film studio and the acoustical standards that we provided you through the Charles M. Salter report (and again noted in the Wilson Ihrig report prepared by your office) should be properly cited in the SEIR and included as appendices.

We noted comments by the City Administrator of Pasadena regarding horn noise and the SEIR tends to focus on some kind of decision hopefully to be rendered by the California Public Utilities Commission (CPUC). We would suggest that these kind of deliberations at the California Public Utilities Commission (CPUC) level are not a solution to the set of problems that require mitigation at the project level. It may be necessary for you to establish standards at the state level but mitigation of the problems should occur in the SEIR and be reflected in the Mitigation Monitoring Plan.

As for mitigation for the vibration impacts from the proposed transit system, we continue to believe that BMC or BMS construction should be included to the rear of the Lacy Street Production Center and shown in Table 4.4-10. We believe that the elimination of sound walls generally may not be good where trains are approaching the 26th Street Station on a curve. Additionally, a low wall along and adjacent to the tracks would eliminate much of the wheel noise that will probably occur in the future. We have raised this issue in some of our discussions with the staff in the past and have yet to receive an adequate response as to what alternative, if any, is proposed to the rear of the studios. Additionally, the track area has some drainage problems associated with it and since our buildings are directly abutting the railroad right of way we believe the drainage problem should be resolved prior to construction of the Pasadena Blue Line. There is a considerable amount of engineering work required in doing this. The construction drawings that we have examined to date do not propose any solutions to these problems to the rear of the studios. We would propose that mitigation of vibration and noise impacts be accomplished before construction is undertaken in 1995 so that filming can continue uninterrupted.

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Our preferred alternative, as recommended in the Salter report, is a barn/tunnel type enclosure of the transit line behind the studios, approximately 600 feet in length. However, we have suggested to your staff that a logical method of handling any on-site mitigation is a third party agreement similar to that used by the Bay Area Rapid Transit District. Through a third party agreement the studio can control any required design and retrofit work, if needed, in addition to the tunnel, and in conjunction with the complex scheduling problems of three or more film companies operating on the site at one time. Additionally, the studio can control the character of the work which is important to maintain the New York industrial look of the studios. It is because of the architectural character of the studios that they have been so successful in attracting so many film companies. PUC Section 180106(b) permits transit authorities broad latitude in hiring and contracting. PUC Section 180154 governs bidding procedures and provides MTA/RCC with more than adequate legal protection for undertaking third party type agreements.

The SEIR provides some indication of site specific mitigation measures but these have not been offered to Lacy Production Studios in our discussions with staff. An example would be the replacement of windows and special treatment of older buildings. The SEIR does speak to the issue of "historic buildings" but does not recognize the studio as having historic character. We would suggest that the historic buildings are no different than many of the older buildings in China Town, along Lacy Street, or in the Pasadena area. When a transit system is developed in older areas of a city then special architectural treatment and acoustical treatments are required. This kind of work cannot be generically treated in a transit authorities Line Construction Standards Manual.

In Table 4.4-2 the footnote references to vibration measurement locations should be clarified. We're not certain that the public knows what the "WIA, 1993" report is about. Does this include the Wilson Ihrig Report completed for the studios? The text below refers to more restrictive criteria, however there is no mention of motion picture studios and the NC35 criterion in the Wilson Ihrig Report.

Under "off-site mitigation", page 4-41, no mention is made of older buildings such as the studios where sealing entire buildings to mitigate noise and vibration will result in need for additional air conditioning units.

MEMO - May 4, 1994

As a general comment we noted that there is no mention of the timing of mitigation measures or construction. A schedule should be part of the Mitigation Monitoring Plan.

Station construction and operation will require different considerations with respect to the studios. A portion of the "chop shop", indicated on Figure 2 as the garage set, abuts the 26th Street Station area. The need to mitigate noise levels on this side of the complex is critical and there needs to be considerable thought given to the architectural treatment along 26th Street as it relates to the station architecture (textures, colors, materials). The increased levels of noise from doors, horns, gongs, and parking lot activity should be considered in the SEIR and mitigated for an important facility such as a motion picture studio.

We have previously provided your staff with information regarding the Department of Water & Power (DWP) facilities being constructed to the south of our facilities. There appears to be no information in the SEIR regarding permits in the pipeline, types of permits, construction under way on other properties and the cumulative implications of transit to these land uses.

Other impacts to the Lacy Street Production Center will include reverberation of noise from the new DWP high rise building south of the studios, loss of outdoor filming areas, loss of light and ventilation, and the psychological impact on location managers due to passing trains. We are continuing to work with your staff on finding solutions to these problems as directed by your Board in August of 1993.

SUMMARY AND CONCLUSIONS:

- A. Very significant, unavoidable, and cumulative impacts, particularly to the Lacy Street Production Center and the number of people employed in the center each year, should be recognized in this SEIR.
- B. Project objectives should be expanded in the Initial Study to include recognition of the importance of land use changes and impacts upon specialized facilities such as motion picture studios and older structures.
- C. There are two essential tests that an SEIR must pass. It must focus upon substantial new information of importance to a project and it must include information necessary to make the previous EIR adequate for the project as revised

MEMO - May 4, 1994

(CEQA guidelines, Section 15163(b)). This SEIR does not appear to meet either of these tests as we understand the CEQA process and based upon the information we have previously provided to your office and in this letter.

- D. Some references and footnotes are unclear and misleading. These need to be cleaned up and additional information provided in this SEIR if the document is to meet the test of adequacy and completeness.
- E. The need for recirculation of this SEIR appears to be necessary after revisions are made. We would like to have a copy of the recirculated document when it is available for public review.
- F. We have continually asked for Public notices. In December we did not receive notice that an SEIR was being prepared. Through other sources we found that the document had been prepared but it was late in arriving, and consequently our time to prepare comments was reduced. We went to the public meeting held in Highland Park in which the documents were to be presented but they were not available.

The type of analysis required when an SEIR is prepared at the project level is necessarily more detailed and, in this case, requires higher levels of analysis. This can only be accomplished with adequate architectural and engineering studies running concurrently with work being undertaken by MTA/RCC.

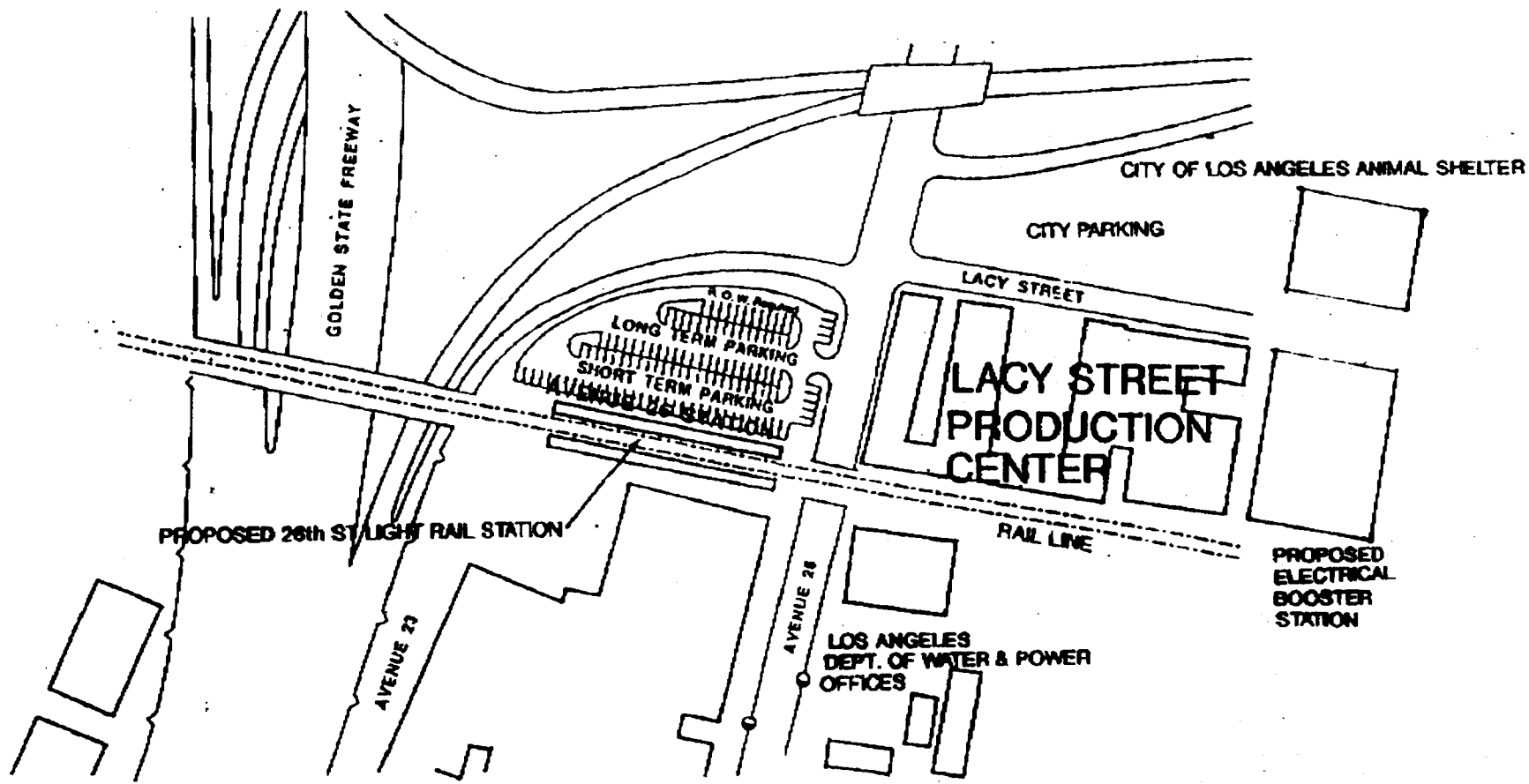
In the spirit of cooperation we will continue to work with you to resolve the problems that we have identified in previous correspondence and in this letter.

MEMO - May 4, 1994

ATTACHMENTS:

- 1) Figure 1 - Lacy Street Production Center Map
- 2) Figure 2 - Lacy Street Production Center Facilities Layout

cc: James S. Knight, CEO, Lacy Street Production Center
Jack Freytag, PE, Charles M. Salter Associates
Paul Drag, AIA, Architect
Office of Councilman Hernandez
Alliance of Motion Pictures Producers and Directors
LACMTA/RCC Board and Staff
Rob Ball, Project Manager, LACMTA/RCC
Mayor Reardon's Office, Attn: Cody Cleff



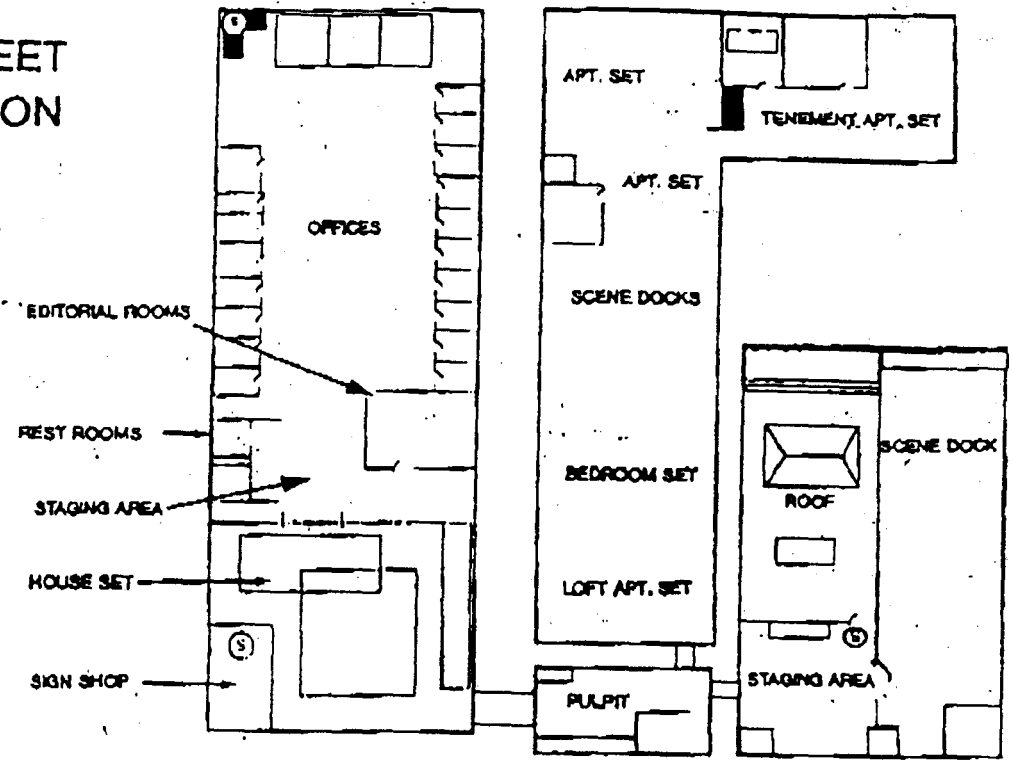
PROJECT NORTH

KING P. LEONARD, AICP/ASLA

FIGURE 1
LACY STREET
PRODUCTION CENTER LOCATION

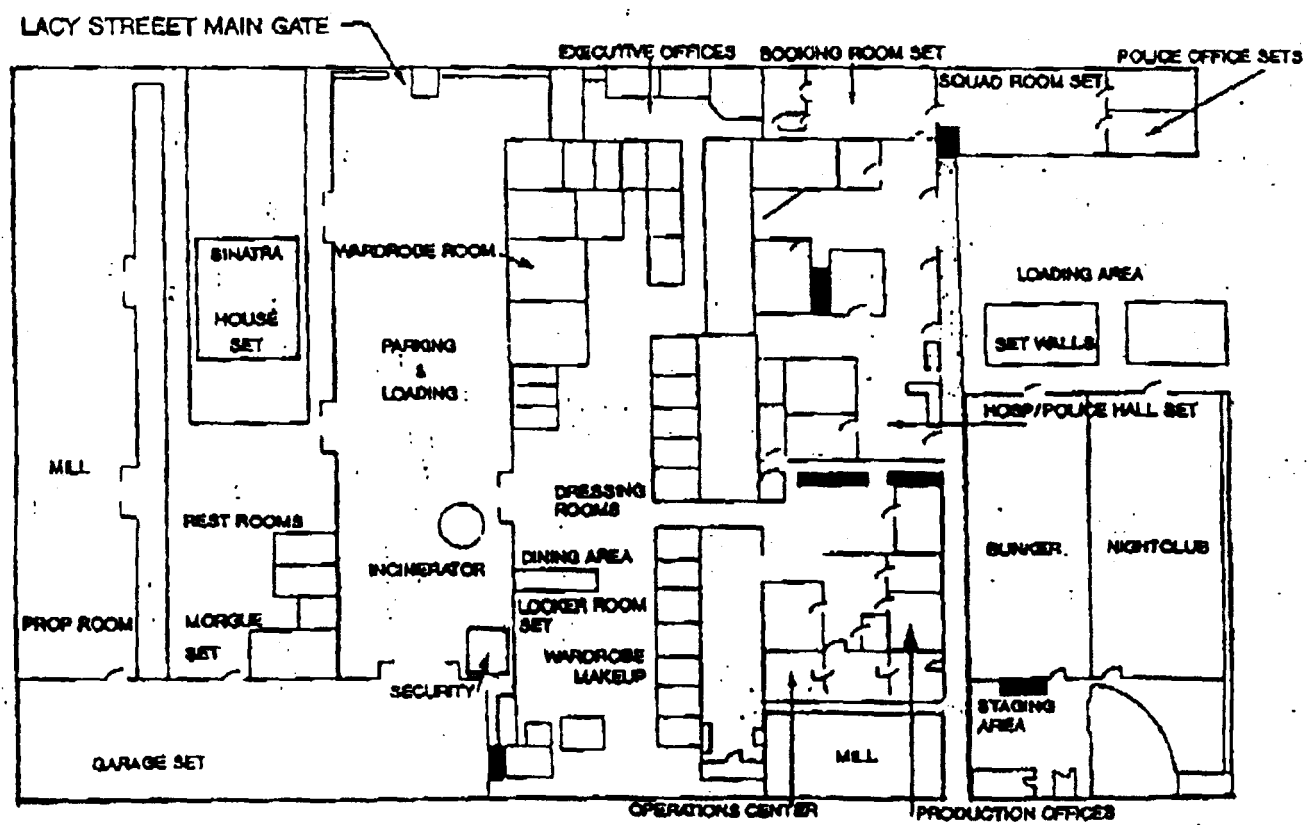
MAY 09 1994 14:52 No.002 p.10
 TEL: 213-244-5011

FIGURE 2
LACY STREET
PRODUCTION
CENTER
FACILITIES



PROJECT NORTH

SECOND FLOOR



GROUND FLOOR

MAY 09 1994 10:00 AM FROM
COMMUNITY ECONOMIC DEVELOPMENT UNIT
LEGAL AID FOUNDATION OF LOS ANGELES

May 9, 1994

LACMTA
818 West 7th Street
Suite 500
Los Angeles, California 90017

TRANSMITTED VIA FAX AND U.S. MAIL

Attn: Mr. Harley Martin,
Environmental Specialist

RE: Our Client: Tri-Communities Organization
Comments on Draft SEIR for
Pasadena-Los Angeles Light Rail Transit Project

Dear Mr. Harley:

Please be advised that our office represents the above-referenced client-organization, Tri-Communities Organization (Cypress Park-Elysian Valley-Glassell Park), an unincorporated association, and these written comments are herein submitted on their behalf.

Our comments are specifically referenced to the sections as identified in the Draft SEIR for the Pasadena-Los Angeles Light Rail Transit Project and as found in Section 4: Environmental Impacts.

I. Section 4.2: Air Quality

4.2.3.1 Construction Air Quality Impacts: Demolition of Buildings. —

The Draft SEIR discloses the potential exposure of the community to asbestos, however it is deficient in that it fails to disclose the even greater potential of exposure of the community to lead during the proposed demolition of subsequently acquired residential structures, particularly along the Marmion Way Corridor in the Highland Park community and the greater potential of fugitive contaminated lead dust particles therefrom. The residential structures proposed to be acquired and subsequently demolished are significantly older structures and have a high probability of lead-based paint throughout them. As a result of this failure, the Draft SEIR is inadequate in its failure to analyze the extent of this potentially significant environmental impact to the air quality and human health of the impacted communities or to propose any mitigations thereof.

4.2.4 Impacts Mitigated to Insignificance by Existing Regulations. —

For the reasons stated above, the proposed mitigations are inadequate. The statement within the Draft SEIR that existing regulations render the environmental impacts insignificant is insulting and erroneous. The standard is reasonableness and regulations are generally construed as minimum standards to be applied. Reasonableness is to be determined as to the direct impact and application on the affected communities/residents/businesses.

Minimum standards for lead-based paint removal and encapsulation have been developed. However, the Draft SEIR is void of any information with regards to the various types of mitigation measures in relation to the removal of lead-based paint. Appropriately tailored analysis and application must be conducted based on the nature and demographics of the densely populated residential community of Highland Park. Reasonableness requires a specific mitigation monitoring implementation plan coordinated with the impacted communities which includes but is not limited to the following elements of: community-based and culturally sensitive involvement through contacts with impacted communities' schools, pre-schools, churches, parks and recreation centers, senior centers; notice and dissemination of information

to impacted communities in languages spoken, including but not limited to English, Spanish, Chinese, Vietnamese and Tagalog re: all findings relating to existence of lead and asbestos and/or any other hazardous materials; schedule of demolition; potential and projected impacts on adjacent residents (health, access impacts, street closures, haul routes); specific types of mitigation measures such as twice daily water spraying; washing down of equipment, streets, hours of construction, etc.; and joint development of a mitigation monitoring and implementation plan.

II. Section 4.4: Noise and Vibration

Section 4.4.5.1 Noise Mitigation -

Draft SEIR's discussion of proposed mitigation measures are inadequate in that it fails to address the potential of its proposed mitigations to create resultant and significant socio-economic environmental impacts in the form of community urban blight.

The proposed noise mitigations of lower sound barrier walls and acquisition of noise easements could potentially result in the creation of community urban blight along the Marmion Way Corridor of Highland Park. The Draft SEIR is deficient of any analysis with regards to the potential long term socio-economic impact of "prime target graffiti walls" along the entire length of the Marmion Way Corridor.

No proposed mitigation measures and/or monitoring implementation maintenance plan exists in the Draft SEIR re: ongoing maintenance and/or landscape buffering of the negative visual aspects of the proposed sound barrier walls. Recommendation is made to consult and include the Highland Park community's artist colony with regards to creative and collaborative maintenance mitigation measures.

The Draft SEIR is also deficient of any analysis of long term real estate devaluation of properties on which noise easements are acquired and on adjacent properties as a result of the existence of such easements on their neighbors' properties. The Draft SEIR proposes compensation of current property owners, which is a bare minimum standard, however no mitigation is proposed or explored with regards to the long term land devaluation to the Highland Park community and the potential to create a blighted corridor along the length of Marmion Way.

The Draft SEIR fails to analyze the most detrimental impact of its proposed noise mitigations in that they will create an entire corridor of residences along Marmion Way which are likely to become blighted in the near future. The value and desirability of the residences will further decrease as a result of the implementation of these proposed mitigation measures. Impacted property owners will be unmotivated to upkeep their properties, causing them to fall into disrepair. Thus, the proposed project has created an unmitigated significant environmental impact, i.e., urban blight.

In the FEIR prepared and certified by the County of Los Angeles for its proposed LAC-USC Medical Center Replacement Project (April 12, 1994), the County clearly acknowledged that its proposed project would have an adverse socio-economic impact on "strip" residences adjacent to but not included within its project site and the remaining community as a result of the isolation and physical location next to a 3000 car eight-story parking structure.

We recommend inclusion of analogous language in the Final SEIR with regards to LACMTA acknowledging the significant adverse impact on the remaining Marmion Way Corridor of Highland Park. As a separate but concurrent action with the certification of the Final SEIR and approval of the proposed project, we recommend that the LACMTA authorize a feasibility study be prepared to determine and assess the LACMTA's and the residents' joint options to prevent further adverse socio-economic impact to the Marmion Way Corridor of Highland Park such as blight, including but not limited to the exploration of acquisition and "park-like landscaped" open space re-use buffer zone and/or off-street parking for

adjacent residents only.

At the bare minimum, the Draft SEIR should conduct environmental analysis of the unmitigated blight that will be created by the implementation of the project's proposed noise mitigations. The proposed mitigation of such potential blight and its resultant socio-economic impact on the adjacent communities abutting the project must be identified.

III. 4.6 Housing

4.6.3.1 Total Parcel Acquisitions

The statement within the Draft SEIR that existing regulations render the environmental impacts insignificant is insulting and erroneous. The standard is reasonableness and regulations are generally construed as minimum standards to be applied. Reasonableness is to be determined as to the direct impact and application on the affected communities/residents/businesses.

The Draft SEIR fails to provide any analysis of the significant environmental impacts on the City of Los Angeles' Housing Element Component of the City's General Plan. As of 1989, the City of Los Angeles had identified a need of 27,270 lower income dwelling units and had produced only 13,951 such units or 51%. (Local Progress in Meeting the Low Income Housing Challenge, California Coalition for Rural Housing, 1989). Furthermore, as of 1991, the City of Los Angeles was found by the State not to be in compliance with its own Housing Element.

The Draft SEIR is further void of any analysis of the significant environmental impacts on the County of Los Angeles' Housing Element Component of the County's General Plan. As of 1989, the unincorporated portion of the County of Los Angeles had identified a need of 15,735 lower income dwelling units and had produced only 1,815 such units or a mere 12%. (Local Progress in Meeting the Low Income Housing Challenge, California Coalition for Rural Housing, 1989). The total Los Angeles County need for lower income dwelling units is 67,745 and as of 1989, only 22,425 (33%) such units have been produced throughout the county. (Local Progress in Meeting the Low Income Housing Challenge, California Coalition for Rural Housing, 1989).

Therefore, the proposed elimination of an unidentified number of units of affordable housing is clearly a significant environmental impact on a worsening city-wide and county-wide affordable housing need, which the Draft SEIR has not only failed to analyze, but also fails to mitigate. In addition, the Draft SEIR fails to analyze the cumulative impact on the loss of housing by the proposed additional acquisitions with its existing proposed taking of residences in conjunction with the French Street station and such projects as the County's proposed LAC-USC Medical Replacement Project which will result in the loss of 160 units and the displacement of 205 households.

The proposed Draft SEIR proposes no mitigation and thus fails to adequately address the need for replacement housing for the unidentified number of affordable housing units that will be destroyed, and the unidentified number of households that will be displaced.

When a public entity displaces residents as a result of any displacing activity (demolition, rehabilitation, eminent domain, etc.), the public entity is required to provide those displaced persons with relocation assistance to assure that within a reasonable period of time, the displaced person is able to relocate to a "comparable replacement dwelling." (Gov. Code Section 7261). "Comparable replacement dwelling" is defined as:

- ... any dwelling that is all of the following:
- (1) Decent, safe, and sanitary.

- (2) Adequate in size to accommodate the occupants.
- (3) In the case of a displaced person who is a renter, within the financial means of the displaced person. A comparable replacement dwelling is within the financial means of a displaced person if the monthly rental cost of the dwelling minus any replacement housing payment available to the person does not exceed 25 percent of the person's average monthly income.
- (4) Comparable with respect to the number of rooms, habitable space, and type and quality of construction . . .
- (5) In an area not subject to unreasonable adverse environmental conditions.
- (6) In a location generally not less desirable than the location of the displaced persons dwelling with respect to public utilities, facilities, services, and the displaced person's place of employment. (Gov.Code Section 7260).

However, where no comparable replacement dwelling is available to a displaced person, and the public entity determines that a comparable replacement dwelling cannot otherwise be provided, the public entity is responsible for providing a comparable replacement dwelling through "any action necessary or appropriate to provide the dwellings by use of funds authorized for the project." (Gov.Code Section 7264.5; see also 42 USC Section 4626, "such action as is necessary or appropriate to provide such housing by use of funds authorized for such project").

The statutory directive in Government Code Section 7264.5 is supplemented by the California Administrative Code in that "no person shall be required to move from his dwelling" . . . unless comparable replacement housing is available," and a public entity "may not proceed with any phase of a project . . . or shall terminate or suspend further implementation of the project activities . . . unless it provides such housing." (Cal.Admin.Code, tit 25, Section 6054).

The Draft SEIR is void of any analysis of the volume and/or socio-economic make-up of the impacted households to be displaced by the proposed project. Thus no analysis exists as to whether or not "comparable replacement dwellings" are available. The Draft SEIR further fails to respond to this critical environmental impact with any proposed mitigation.

Both the Federal and State replacement housing laws require that where the public entity taking housing units cannot locate comparable replacement dwellings for the displaced households, the public entity is required to provide dwellings for those households by any action which is necessary. (Gov.Code Section 7264.5; Cal. Admin. Code, Tit 25, Section 605; 442 USC Section 4626; 49 Code of Federal Regulations, Section 24.404 (1992); McKenon v. Hastings College of Law 230 Cal.Rptr. 176, 186-87, 185 Cal.App.3d 896 (1986); Osburn v. Department of Transportation 270 Cal.Rptr. 761, 765, 221 Cal.App.3d 1347 (1990)).

The Federal Code of Regulations lists several means by which the public entity can provide comparable replacement housing: 1) rehabilitation of and/or additions to an existing replacement dwelling, 2) construction of a new replacement dwelling, 3) relocation and, if necessary, rehabilitation of a dwelling, and 4) purchase of land and/or a replacement dwelling by the displacing entity and subsequent sale or lease to, or exchange with a displaced household. (Code of Fed. Reg., Section 24.404[c](1)).

In such instances, precedence exists for the implementation of mitigation measures such as the creation of replacement housing trust funds to assist nonprofit developers to construct the actual replacement housing units of analogous type within the impacted communities abutting the proposed project. The Century Freeway Expansion Housing Trust Fund is an example of such mitigation measures.

Thus, the Final SEIR must include a plan for how the LACMTA will provide housing units for the

number of households for which there is no available comparable replacement dwelling. This replacement housing plan must be done immediately so that the replacement housing is available prior to the dislocation of any household. Without such replacement housing being made available, the LACMTA cannot proceed with any part of the proposed project. (Cal.Admin.Code, tit 26, Section 6054).

In the instances where replacement housing units are identified, the Final SEIR must state such replacement housing meets the criteria set forth in Government Code Section 7260[1] and 442 USC Section 4623[a][1][A] and 4624[2].

The Final SEIR is deficient of any analysis as to the availability of comparable replacement dwellings for the rental and homeowner households that will be displaced by the project.

* Draft SEIR is void of information indicating that the replacement dwellings are "decent, safe, and sanitary." (Gov.Code Section 7260[1][1]).

* Draft SEIR is void of information indicating that the replacement dwellings are comparable "with respect to the habitable space, and the type and quality of construction." (Gov. Code Section 7260[1][4]). A large majority of the displaced renter households will be displaced from dwellings which were single family residences.

* Draft SEIR is void of information indicating that the replacement dwellings are comparable with respect to location. (Gov.Code Section 7260[1][6]).

The Final SEIR must include a comprehensive evaluation of available replacement housing. Without more specific information, the facts upon which the LACMTA is relying to document the availability of replacement housing is deficient under the law. (Keith v. Volpe).

On behalf of our clients, we strongly propose adoption and inclusion of language regarding the mitigation measures provided in the FEIR prepared and certified by the County of Los Angeles for its proposed LAC-USC Medical Center Replacement Project (April 12, 1994) [See pages 209-211 of FEIR and relevant responses to DEIR comments, State Clearing House No. 92101010]. The issues and concerns raised by the community in conjunction with that project are the same as those raised by our clients in connection with the LACMTA's proposed project. Thus the LACMTA should follow the lead of the County and adopt similarly and appropriately tailored mitigation measures to address community and impacted residents' concerns regarding displaced issues; relocation assistance issues; and one for one replacement housing needs issues as it relates to affordability, type (single family/homeownership) and physical location within the impacted communities.

In adopting its proposed mitigation measures, the County acted in good faith to reflect the intent of the applicable laws governing relocation of displaced residents, i.e., to implement the legislature's attempt to render the adversely impacted displaced residents "whole" again to as great an extent as is feasibly possible. To this end, the Final SEIR should include similar language which acknowledges the cumulative adverse environmental impact on the affordable housing needs of the Northeast communities through its displacement of households in the Highland Park community. The LACMTA should further acknowledge the severe hardship its project will have on these displaced residents, and therefore should include language within the Final SEIR of the intent of the LACMTA to adopt an adequate mitigation measure in the form of a Relocation Assistance Program Plan for the proposed project, which will be customized, applied and implemented in a sensitive manner to render the residents as "whole as is feasibly possible" according to their individual needs and situations.

4.6.3.2 Partial Parcel Acquisitions

The Draft SEIR fails to analyze the cumulative impacts of its failure to mitigate the detrimental impact of creating an entire corridor of residences along Marmion Way which are likely to become blighted

in the near future. The value and desirability of the residences will decrease further as a result of the implementation of these proposed mitigation measures. Impacted property owners will be unmotivated to upkeep their properties, causing them to fall into disrepair. Thus, the proposed project has created an unmitigated significant environmental impact, i.e., urban blight.

The Draft SEIR is also deficient of any analysis of long term real estate devaluation of properties on which partial acquisition will occur and on adjacent properties as a result of the existence of the reduction of front or back yard areas, reduced vehicle access, and/or loss of parking. The Draft SEIR proposes compensation of current property owners, which is a bare minimum standard, however no mitigation is proposed or explored with regards to the long term land devaluation to the Highland Park community and the potential to create a blighted corridor along the length of Marmion Way.

As stated in Section II above, we make reference to the FEIR prepared and certified by the County of Los Angeles for its proposed LAC-USC Medical Center Replacement Project (April 12, 1994), and propose the same recommendation as stated therein above.

IV. 4.7 Transportation and Circulation -

The Draft SEIR fails to address the cumulative impact that the proposed five additional street closures and the partial parcel acquisitions will have on the on-street parking in the area. The impacted Highland Park community consists of older residential structures with limited to no off-street parking, and the loss of existing off-street parking will further exasperate this parking need. Thus, the Draft SEIR is deficient for its failure to provide or otherwise propose any mitigation measures for this negative environmental parking impact.

V. 4.9 Human Health -

All of the concerns and comments stated above in Section I are incorporated by reference herein. Especially as they relate to the failure to address potential lead exposure during the construction/demolition of buildings phases.

VI. Cumulative Impacts -

Concerns and comments regarding the cumulative impacts of the proposed project are stated above in Sections III and IV are incorporated herein by reference.

VII. Conclusion -

For all the reasons stated above, the Draft SEIR is deficient in that it fails to adequately inform the public as to the extent and magnitude of the proposed project's negative environmental impacts and the reasonableness of the Draft SEIR's proposed mitigation measures. The public is thereby denied its mandated opportunity to adequately comment thereon.

Respectfully submitted,

Legal Aid Foundation of Los Angeles,
Community Economic Development Unit


By Sharon M.Y. Lowe, Attorney at Law

cc: Tri-Communities Organization
Cypress Park-Elysian Valley-Glassell Park

T.A. NELSON, P.E.
CONSULTING ENGINEER
TRANSPORTATION CONSULTANT

2563 Dearborn Dr., Los Angeles, CA 90068 (213) 462-5500

May 2, 1994

James L. Sowell ..
Mgr., Environmental Compliance
L. A. County Metro. Transp. Authority
818 W. 7th Street, Suite 300
Los Angeles, CA 90017

Dear Mr. Sowell:

This letter is in reference to the second Draft Supplemental EIR, Pasadena-L.A. LRT Project dated March 25, 1994. The DSEIR does a credible job of covering the issues in the five areas studied. I have a few comments as follows.

Page 4-35 -- Sound levels along Marmion Way may not be intrusive to residents. A sound that is expected and occurs regularly, if not overly excessive, is often ignored. This has been my experience, having lived and attended school next to streets carrying electric interurban lines. Walls tend to divide communities; landscaping may be substituted. The lower sound level emitted by the new L.A. Standard LRVs may be acceptable without external mitigating measures.

Page 4-58, 4.7.1.3 -- A drawing of the Marmion Way/Figueroa St. below-grade separation should be included with the Final SEIR.

Page 4-63, 4.7.3.3 -- Due to the nature of excavations, a below-grade separation at Figueroa/Marmion will have greater construction impacts than an aerial structure. Figueroa will probably be narrowed or detoured during construction. Based on preliminary drawings, it appears that residents southwest of French Ave. will lose direct access to Pasadena Ave. via French and will be required to use Ave. 37. This negative impact may be considered mitigated by the improved access to an LRT station at French Ave. compared to the previously planned station location at Figueroa St. The realignment of Pasadena Ave. with Marmion Way at Figueroa does improve the street system.

Page 4-82, 4.8.3.3 -- Criminal activity in the below-grade separation at Figueroa may be limited by strategically placed fencing and lighting. Monitoring may be possible from closed-circuit video cameras mounted either side of Ave. 37 and Figueroa, if they can be made theft proof. In referring to utilities relocation, the most important entity was omitted, the Dept. of Water and Power. The Gas Co., Pac Tel, and TV cable company may be involved, also.

Sincerely,

T. A. Nelson

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Citizens
Committee
to Save
Elysian Park



RE: Draft Supplemental Environmental Impact
Report--Pasadena-Los Angeles Light Rail
Transit Project (DSEIR)
SCH# 93121099

1501 Cerro Gordo
Los Angeles, CA 90026
(213) 666-9651, 222-8050
May 6, 1994

James L. Sowell
Manager, Environmental Compliance
L.A. County MTA
818 West 7th Street, Suite 300
Los Angeles, CA 90017

Dear Mr. Sowell:

The Citizens Committee to Save Elysian Park (CCSEP) would like to challenge the DSEIR on several counts regarding the Midway Yard.

To begin, the original EIR document the Midway Yard was listed along with Taylor Yard and the Cornfield-Bullring Yard as a potential site for a maintenance facility, but in a subsequent paragraph was dismissed as being too small. Now MTA has decided to use the yard that is not only too small but also requires a secondary fire road that will cost \$millions to build. Add to that that this fire road will both take park land with no compensation offered and permanently scar an Elysian Park hillside--all for a temporary facility.

The proposed retaining walls for this road are not 0-36' as indicated on Figure 3.3-6. Current plans call for walls on both the upper and lower banks of the road totalling up to 50' in height for as long as 280'. Furthermore, the road as planned would destroy a hilly nob in Elysian Park replete with mature trees. To state that "No impacts...will be significant. Therefore mitigation measures are not required." (4.7.5.4) is ludicrous.


Firstly, taking of park land is illegal per City Charter unless the taking agency bequeaths equal or greater acreage in the area as replacement park land. Secondly, there must be additional landscape mitigation for such an expanse of retaining wall, and the mature trees lost must be replaced with an equal or greater amount of mature trees.

It would be a much better solution to realign the road down the natural draw which is what the Department of Water and Power (DWP) pump station road follows. When DWP completes construction of its new chlorination station, it will have no need for the old pump station building, and MTA could continue the road down into the yard through that site. This scenario would both save the hill and trees from destruction, as well as eliminate huge and unsightly retaining walls. Assuredly, it would also cost a fraction of the currently proposed overly engineered road.

Comments to MTA
RE: Draft Supplemental Environmental Impact Report--
Pasadena-Los Angeles Light Rail Transit Project (DSEIR)
SCH# 93121099

Lastly, CCSEP fully expects MTA to commit to constructing a bike path from Taylor Yard into Elysian Park as mitigation. Before recent work involving new tracks and bridges for both the maintenance facility and Metrolink, uninterrupted access in the form of a crude path existed along the Los Angeles River from Barclay Street (where the current approved bike path ends) to Elysian Park via the Midway Yard. Because of rugged topography, the Buena Vista area of the park above Midway Yard is the only logical point to connect Elysian Park to the river bikeway which it is hoped will eventually extend to Long Beach. As a transportation agency, MTA has a responsibility to preserve this access.

Sincerely,



Sallie W. Neubauer
President, CCSEP

Los Angeles Unified School District

Facilities Asset Management Division

Abney A. Thompson
Superintendent of Schools

Environmental Review File
Pasadena-Los Angeles Light Rail Transit Project

William H. Magee
Special Assistant to the Superintendent

C. Douglas Brown
Interim Coordinator

Bob Niccum
Director of Rail Branch

May 9, 1994

Mr. Harley Martin
 Los Angeles County
 Metropolitan Transportation Authority
 818 West 7th Street
 Los Angeles, CA 90017

Dear Mr. Martin:

Re: Pasadena-Los Angeles Light Rail Transit Project

Thank you for providing us the opportunity to comment on the Draft Supplemental Environmental Impact Report (SEIR) for the above-referenced project. The attached comments of the District's Environmental Health and Safety Branch, together with the comments below, constitute our response to the document.

THE DRAFT SEIR WAS NOT RESPONSIVE TO LAUSD'S COMMENTS ON NOP

Need To Maintain Access across French Avenue, near Loreto School:

The District's January 18, 1994 comments to the Notice of Preparation (NOP) asked that impacts of this project on students' safe pedestrian routes to school be considered in the SEIR. Not only did the SEIR not provide a plan of the proposed below-grade alignment at Marmion Way and Figueroa Street, it did not even mention that this alignment would involve closure of French Avenue to traffic, bicyclists, and pedestrians. We were not aware of this closure until yesterday when, in response to our request, we received the engineer drawings for the below-grade option. We noted that the station had been moved further to the north than was indicated in the previous EIR, so that it partially blocked the intersection at French Avenue. We were told by Metropolitan Transportation Authority (MTA) staff that they recently determined that French Avenue would be closed.

The importance of keeping French Avenue open for students is an issue which we addressed in our comments to the previous SEIR. The Final EIR of January 1993, in the Response to Comments section, stated that French Avenue will remain open. This is important because this route is used by a large number of students who attend Loreto School, as well as by students of other schools in the area. Loreto School in particular has perhaps 100 students who live on the east side of Figueroa Street and the tracks; many of these students walk or bicycle to school via French Avenue which is the most convenient and safest route. A crossing at Avenue 37, to the north of French Avenue, is not a good alternative. Nor is the pedestrian bridge over the Pasadena Freeway, just south of Loreto Street School, a good alternative pedestrian route because it is not considered safe by many in the community. It is imperative that the MTA maintain the crossings to vehicular, pedestrian and bicycle traffic at French Avenue.

Mr. Harley Martin

-2-

May 9, 1994

Please describe in detail the route that will be available over French Avenue to pedestrians, bicyclists, and vehicles.

We have also been advised by MTA staff that it is possible that during construction, both French Avenue and Avenue 37 might be closed to vehicular, bicycle, and pedestrian traffic. If this should be the case, we ask that the MTA provide a shuttle bus to take students to and from school.

Attached is a plan showing schools in the area of Marmion Way and Figueroa Street. The attendance area of Loreto Street School is outlined in red.

General Concerns About Safety of Pedestrian Routes to Schools:

Despite our request in our letter of January 18, 1994, there is nothing in the DEIR to address the impacts that the project will have on students' safe pedestrian routes to school. The concerns of the District's Student Traffic and Safety Education Section are therefore resubmitted, and we ask that you address them in the Response to Comments Section of the Final SEIR.

Please provide a mitigation measure to ensure that the very successful "School Safety Program" will continue to be provided to schools which are impacted by the Marmion Way street closures and light rail construction and operation.

It is particularly important that a mitigation measure be added to ensure that school principals be provided adequate notice of street closures and of construction that may interfere with the established student pedestrian routes. Principals must have adequate notice so that they can advise students and parents of these changes.

Mitigation of Impacts at Arroyo Seco School:

In regards to our response to the NOP that impacts on Arroyo Seco School be further analyzed, we have been advised by MTA staff that the SEIR did not analyze these impacts because the project description did not include changes made in the area of the Arroyo Seco School: the alignment segments weren't re-analyzed there because there were no street closures, nor was there a need to reduce the height of the soundwall because there were no visual obstructions to train operators, pedestrians, or motorists in these areas.

Are we therefore correct in understanding that the January 1993 Final EIR, together with the mitigation measures described therein and incorporated into the Mitigation Monitoring Program, is valid as it pertains to the Light Rail project in the vicinity of Arroyo Seco School? In particular, do the noise mitigation measures which were added to the Final EIR in January 1993 remain unchanged?

Thank you for sending us the design drawings for the site work near Arroyo Seco School. We will be commenting on this by separate mail.

Mr. Harley Martin

-3-

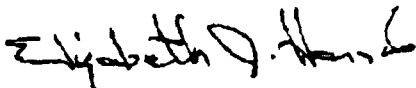
May 9, 1994

MISCELLANEOUS COMMENTS**Description of staging areas and haul routes:**

Please provide a plan of the construction staging areas, and the extent of the construction in relation to Loreto School and Hillside School. Please identify the haul routes, and the frequency of the haul trucks. We understand the construction phase may last for seventeen months. If these trucks pass schools, please either quantify the noise and air impacts, or provide a mitigation measure that these trucks will not pass by schools during school hours.

We look forward to working with you to more fully identify the impacts of this project on District schools, and to plan for mitigation measures so that student routes to schools will remain safe and convenient.

Very truly yours,



Elizabeth J. Harris
California Environmental Quality Act Officer

EJH:ldf

Attachments

c Ms. Quezada
Ms. Korenstein
Mr. Thompson
Mr. Koch
Mr. Brown
Dr. Acosta
Ms. Parachini
Mr. Ranck
Mrs. Steuben
Ms. Wong
Dr. Ziegler
Councilman Hernandez

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**INTER-OFFICE CORRESPONDENCE
LOS ANGELES UNIFIED SCHOOL DISTRICT**

TO: Elizabeth Harris, CEQA Officer
Real Estate Branch

Date May 2, 1994

FRC M: Janice Sawyer *Janice Sawyer*
Environmental Health and Safety Branch

SUBJECT: DRAFT SUPPLEMENTAL ENVIRONMENTAL IMPACT REPORT: PASADENA-
LOS ANGELES LIGHT RAIL

In response to your request for comments regarding the above referenced project, the following is provided.

Under the California Environmental Quality Act, the applicant has the responsibility to reasonably attempt to disclose the impacts of its project on sensitive receptors populations. Below are concerns that must be addressed:

1. It is staff's recommendations that the criterion for allowable groundborne vibration levels be decreased from 75 (dB) to 70 (dB) at schools, and any mitigation measures be adjusted accordingly. Students are more sensitive and responsive to the effects of vibration than are adults. Operational vibration, even at very low levels, can interfere with the learning environment.
2. The Design Criteria indicate a maximum allowable level of 75 to 85 dBA for sensitive receptors depending on existing use along the segments of the alignment. These levels are unacceptable and conflict with District noise standards (67 Leq for exterior noise and 52 Leq for interior noise). The criteria should be adjusted to be within levels acceptable to the District.
3. The details regarding the below-grade segment is unclear. The location of the segment, haul routes, construction staging areas were not defined. Without clarification, the impact to adjacent schools cannot be ascertained.

If you should have any questions, please free to call me at 7371.

IS:js

ATTACHMENT

**STUDENT AUXILIARY SERVICES BRANCH
School Traffic and Safety Education Section****RE: PARADISE-LOS ANGELES RAIL TRANSIT PROJECT, SECOND
SUPPLEMENTAL ENVIRONMENTAL IMPACT REPORT DATED 11/24/93.**

NOTE: The following are concerns/suggestions that Real Estate Branch may wish to consider/address regarding issues affecting the LRT Alignment along Marmon Way in Mount Washington and in the vicinity of Marmon Way and Figueroa Street in Mount Washington:

Closure of Avenues 51, 53, 55, and 61 (south of Figueroa Street) across the railroad right-of-way appear to impact the integrity of the current Pedestrian Routes Map for students attending the following schools:

Aldana School (Avenue 51)
Monte Vista School (Avenue 53)
Monte Vista School (Avenue 55)
Garvanza School (Avenue 61)

A study must be made to identify alternate safe and convenient pedestrian routes. DOT will need to revise current map to reflect any changes.

In addition to the above concerns, the following suggestions and concerns should be addressed as appropriate for the Mount Washington area as well as for the project in general:

It is imperative that METRO provide at no charge to the school district an instructional rail safety program and materials to all affected elementary and middle schools.

School Transportation must be contacted regarding the potential impact, if any, upon existing school bus routes.

Contractors must guarantee that safe and convenient school pedestrian routes are maintained. School Pedestrian Routes maps will be furnished upon request.

Contractors must maintain ongoing communication with administrators at impacted school sites providing sufficient notice to forewarn children and parents when currently existing school pedestrian routes will be impacted. School Pedestrian Routes maps will be furnished upon request.

Appropriate traffic controls (signs and signals) including automatic crossing gates and warning signals, must be installed as needed to ensure pedestrian and vehicular safety.

Construction scheduling should be sequenced to minimize conflicts with pedestrians, school buses and cars.

Funding for crossing guards to be provided when safety of children compromised by construction related activities at impacted crossings.

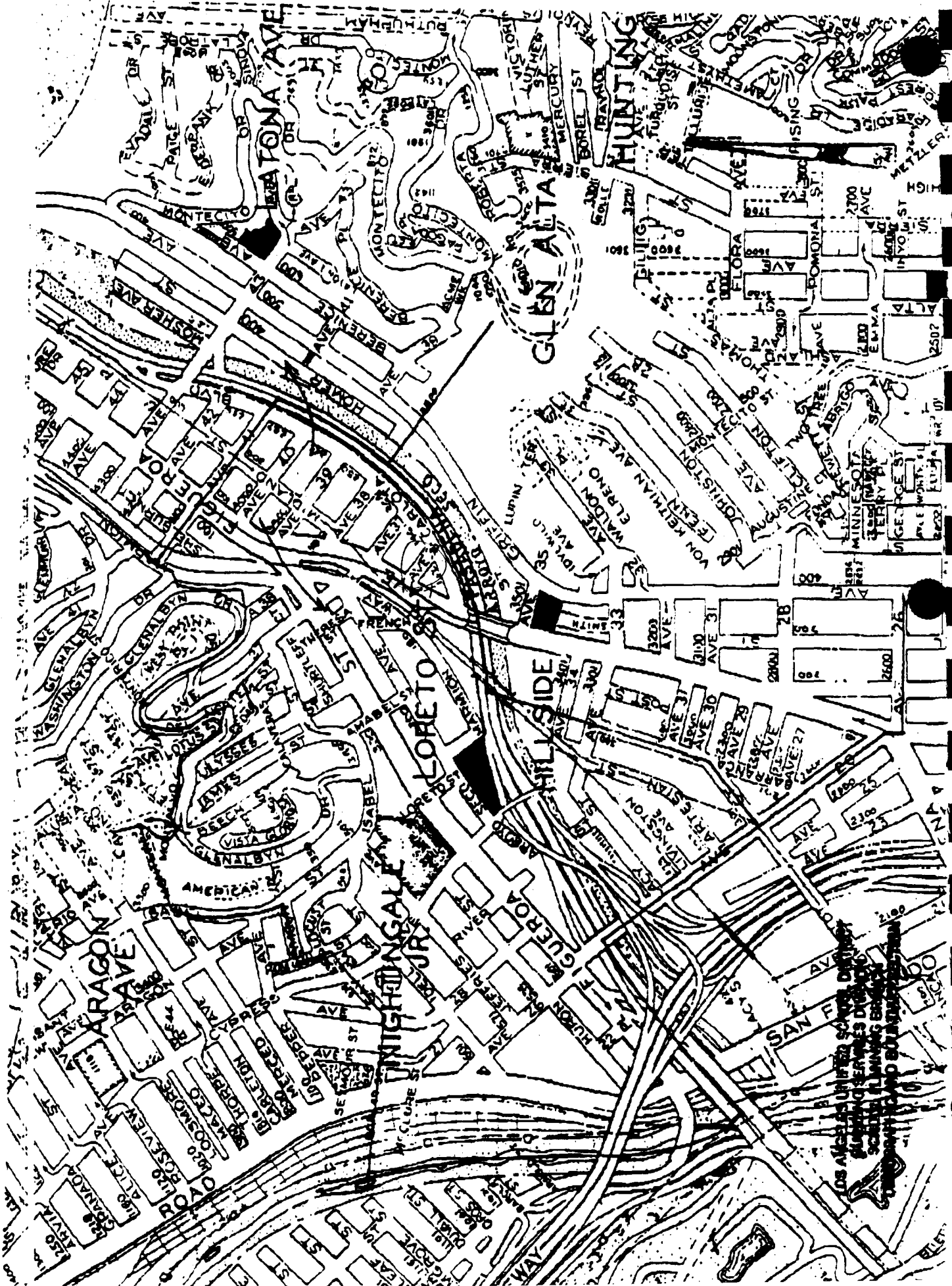
Funding for a flag person to be provided as needed where construction related activities compromise the safety of pedestrians and/or motorists while traveling to and from school.

Pedestrian right-of-way near rail line must be clearly marked to minimize trespassing, vandalism, and short-cut attractions.

Barriers must be constructed as needed to minimize trespassing, vandalism, and short-cut attractions.

Security patrols should be funded and provided to minimize trespassing and short-cut attractions.

Fencing should be installed to secure construction equipment to minimize trespassing, vandalism and short-cut attractions.



LOS ANGELES UNITED STATES DISTRICT COURT
CLERK OF COURTS DISTRICT OF LOS ANGELES
SCOTT J. JAWORSKI
CLERK OF COURTS DISTRICT OF LOS ANGELES

Neighborhood Information Network

P.O. Box 70757, Pasadena, Ca. 91117

Phone & Fax: (818) 351-1203

261129 APR 22 8

21 April, 1994

LACMTA
818 W. 7th Street
Suite 500
Los Angeles, Ca. 90017

Attn: Mr. Harley Martin, Environmental Specialist

Re: Pasadena-Los Angeles LRT Project SEIR

Dear Mr. Martin,

This letter will confirm my verbal testimony at your public hearing the evening of 20 April at the Hastings Ranch Library in the city of Pasadena.

First I would like to congratulate the MTA on finally addressing the concerns we voiced in late 1991 and early 1992 about potential problems with air quality and traffic at the Sierra Madre terminus. Unfortunately, your additional studies confirmed that which we had feared the most. Traffic grid lock will most likely occur and the CO concentrations will be dangerously high once the project is completed and in service.

TRAFFIC

The following comments apply to your analysis of traffic impact on the Northern site, the Johnson & Johnson property.

Sierra Madre Villa and Foothill - LOS calculations for 2010(total) show a level of 1.105. After mitigation a level of 0.942.

Halsted and Foothill - LOS calculations for 2010(total) show a level of 1.012. After mitigation a level of 0.801.

Rosemead and Foothill - LOS calculations for 2010(total) show a level of 1.099. After mitigation a level of 1.005.

Rosemead and Colorado Blvd. - LOS calculations for 2010(total) show a level of 1.037. I did not find mitigation measures for this intersection as related to the Northern site. However, the proposed mitigation measures for the Southern site of the same intersection showed a level of 0.959.

The LOS definitions provided in the SEIR state that level E, with a range of .91 to 1.0, will provide "*Unstable flows. Represents the capacity of the intersection. There may be long queues of vehicles waiting through several signal cycles*". As you know, the definition of Level F is even worse!

We do not agree with your conclusion (Table 2.2-1 on page 2-5) that the Transportation and Circulation problems are "*Not significant*". We believe they are *quite significant!*

Bottom line is that we request you consider further mitigation measures to reduce the LOS impact on the two LOS level E and one level F (after mitigation) intersections. Consideration might be given to the following: The elimination of pedestrian cross traffic at these intersections by providing either overhead or underground pedestrian crossings. Provision of overhead or underground auto passes for through traffic. Utilization of counterflow traffic lanes depending on the time of day and traffic direction. A portion of Foothill Blvd. has an unused median that could be placed in service as well as Rosemead Blvd. south of Colorado.

AIR QUALITY

We are concerned that the anticipated level of CO emissions at peak ambient 8-hour average concentrations at the Sierra Madre Station Park and Ride facility are approaching the danger level. The stated figures (page 4-20) of 8.8 ppm is really too close to California Standards 8-hour level of 9.0 ppm. A slight error in calculation of the amount of anticipated traffic could easily create a situation where the 9.0 ppm level would be exceeded. How do you mitigate this potential problem?

STATION CONFIGURATION

The following comment refers specifically to the Northern Station site. Your description of the proposed station on page 4-19 does not agree with a proposed parking site plan (attached) that I obtained this week from the city of Pasadena which was not a part of this SEIR. Further, the parking site plan included property at the corner of Halsted and Foothill that is not a part of the Johnson and Johnson facility. Elimination of this property would reduce the proposed configuration by approximately 100 std. parking spaces. Consideration should be given to reconfiguration of the site to accommodate 1000 vehicles.

Thank you for the opportunity to make these comments about the SEIR. We trust you will respond favorably and assist us in building a light rail transit facility that will *benefit* East Pasadena and *not seriously impact* our community.

Sincerely,


Cliff Benedict, Chair

cc: Cynthia Kurtz, Director
Public Works, City of Pasadena



Pasadena Heritage

May 7, 1994

Mr. Harley Martin
Los Angeles County Metropolitan Transportation Authority
Rail Construction
818 W. 7th Street
Los Angeles, California 90017

RE: Draft Supplemental Environmental Impact Report
LACMTA/RCC Pasadena-Los Angeles Light Rail Transit Project

Dear Mr. Martin:

On behalf of the Board of Directors of Pasadena Heritage, thank you for this opportunity to comment on the DSEIR for the LACMTA/RCC Pasadena-Los Angeles Light Rail Transit Project.

Our primary concern is the Johnson & Johnson/Merck site located on E. Foothill Boulevard in Pasadena, one of two sites under study as a potential park and ride location. Our comments are as follows:

Table 2.2-1

The Johnson & Johnson/Merck facility has been determined by the City of Pasadena Cultural Heritage Commission to meet the criteria for an "Historic Treasure," the highest landmark designation in the City of Pasadena. Two landmark nominations (City and National Register of Historic Places) are pending, as stated in the document.

The loss of this building is recognized in the document as a significant negative impact with mitigation required. Documentation of the building is not acceptable mitigation under CEQA.

Section 2.4

The demolition of the Johnson & Johnson/Merck building is a controversial issue and needs to be resolved.

Section 4.10.1

The description of the site and its significance is adequate. Please note that on page 4-90, second line, Pasadena Heritage is the complete name of the organization (a private non-profit organization). The word "commission" should be deleted.

Section 4.10.3

The statement is made that "If the Johnson and Johnson/Merck site is selected ... all of the buildings and structures would be subject to demolition. Demolition of any structure at the site nominated for listing in the National Register of Historic Places

would result in a significant adverse impact to a cultural resource." The DSEIR recognizes that the building should be treated as eligible for the National Register.

Alternatives to demolition which would mitigate this significant adverse impact should be presented as part of this document. (While recordation may be part of the process, it is not mitigation and does not reduce the negative impact to zero.)

Alternatives should include, but not be limited to:

Developing a reuse alternative for the historic building which could meet needs of the agency and using the rest of the site as the Park and Ride facility.

Using that portion of the site which is vacant or currently has nonsignificant buildings for the Park and Ride facility and leasing the building.

Entering into a joint development agreement with another agency or private party to reuse the building and construct the parking jointly.

Seeking a subdivision of the property and purchasing the southern portion of the property only.

What changes in circulation plans would be indicated if the building were preserved or reused? What would the relative costs and savings be for each alternative?

With regard to the 106 process, how is the treatment of historic properties addressed in the Memorandum of Agreement, Programatic Agreement or Memorandum of Understanding signed by the MTA, ACHP and FHA and the SHPO?

If there are interested parties concerned with the preservation of the cultural resource, must not consideration be given to the preservation of the significant structure?

In closing, please let us reiterate that a thorough exploration of alternatives for the Johnson and Johnson/Merck building must be included in the Final EIR so that these can be considered as part of the decision-making process.

Sincerely



Susan N. Mossman
Executive Director

/snm

MICROFILMED
COPY IN RMC

261238 APR 25 6 April 21, 1994

Metropolitan Transportation Authority
C/O Harley Martin
818 W. 7th St.,
Los Angeles, CA 90017

Please do not consider the new Orchard Hardware Supply property located at 3425 E. Colorado Blvd. in East Pasadena for the proposed light rail trolley stop. We citizens need the store, and the city needs the tax income.

Why were they permitted to spend large sums preparing the site for the new store if this was in your plans?
Johnson/Merck on E. Foothill has been vacant for a long time and Kodak Datatape is also available.



George W. Sabin
711 Lomora AV.,
Pasadena, CA 91107

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3.2 TRANSCRIPTS OF PUBLIC MEETINGS

The transcripts of the public meetings held at the Franklin High School Auditorium in Highland Park on April 13, 1994, and the Pasadena Hastings Branch Library in Pasadena on April 20, 1994, are presented on the following pages.

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LOS ANGELES COUNTY
METROPOLITAN
TRANSPORTATION AUTHORITY
PUBLIC HEARING

BENJAMIN FRANKLIN HIGH SCHOOL
820 NORTH AVENUE 54
HIGHLAND PARK, CALIFORNIA
WEDNESDAY, APRIL 13, 1994
COMMENCING AT 7:10 P.M.

REPORTED BY: MARK SCHWEITZER

1 HIGHLAND PARK, CALIFORNIA; WEDNESDAY, APRIL 13, 1994

2 7:10 P.M.

3 -000-

4
5 MR. LANTZ: GOOD EVENING, LADIES AND GENTLEMEN.
6 THANK YOU FOR COMING OUT TONIGHT. TONIGHT WE HAVE AN
7 INTERPRETATION TRANSLATION SERVICE AVAILABLE FOR THOSE THAT
8 DO NOT SPEAK ENGLISH OR WOULD RATHER LISTEN OR SPEAK IN
9 SPANISH. AND AT THIS TIME I'D LIKE TO INTRODUCE THE
10 TRANSLATOR, MARIA GALYAN, WHO CAN GIVE YOU THE INFORMATION
11 IN SPANISH ON THAT.

12
13 (INTRODUCTION IN SPANISH BY INTERPRETER)

14
15 MR. LANTZ: MY NAME IS STEVE LANTZ. I'M THE
16 DIRECTOR OF THE SAN GABRIEL VALLEY TEAM FOR THE L.A. COUNTY
17 METROPOLITAN TRANSPORTATION AUTHORITY. IT'S A LONG TITLE.
18 I'M HAPPY TO BE HERE AS YOUR OFFICIAL HEARING OFFICER
19 TONIGHT.

20 THIS PROCESS IS A LITTLE DIFFERENT THAN A
21 COMMUNITY MEETING IN THAT THIS PORTION OF TONIGHT'S MEETING
22 IS A FORMAL PUBLIC HEARING IN WHICH ANYBODY WHO WISHES TO
23 SPEAK MAY DO SO AT THE MICROPHONE FOR THREE MINUTES AND IN
24 WHICH THERE WON'T BE ANY FEEDBACK GIVEN TO YOU DURING THE
25 PUBLIC HEARING. FOLLOWING THE FORMAL PUBLIC HEARING, ONCE

1 EACH PERSON HAS GIVEN THE TESTIMONY THAT THEY WOULD LIKE TO
2 DURING THAT THREE MINUTES, THEN WE WILL HAVE STAFF AVAILABLE
3 TO ANSWER QUESTIONS AND TO TURN THIS INTO MORE LIKE AN OPEN
4 HOUSE. BUT IT IS IMPORTANT THAT WE SEPARATE THE TWO
5 FUNCTIONS, THE ONE FUNCTION OF RECEIVING THE FORMAL
6 TESTIMONY, AND THE SEPARATE FUNCTION OF TALKING WITH YOU
7 INFORMALLY ABOUT YOUR FEELINGS ABOUT THE PROJECT.

8 I HAVE SOME FORMAL RESPONSIBILITIES. ONE OF THOSE
9 IS TO READ THIS THREE-PAGE SCRIPT. SO IF YOU'LL BEAR WITH
10 WE, I'LL TRY TO MAKE IT AS LIGHT AS POSSIBLE, BUT WE NEED TO
11 USE THE SAME WORDS AT EACH OF THE PUBLIC HEARINGS. I WILL
12 BE MODERATING TONIGHT'S PUBLIC HEARING AND ENSURING THAT
13 YOUR COMMENTS ARE ENTERED INTO THE ADMINISTRATIVE RECORD. I
14 WOULD LIKE TO INTRODUCE OTHER TEAM MEMBERS WHO ARE PRESENT
15 TONIGHT. THEY ARE ROB BALL WITH THE RCC, WHO IS A DEPUTY
16 PROJECT MANAGER. ROB?

17 NO APPLAUSE IS NECESSARY.

18 SECONDLY, FROM THE RCC ENVIRONMENTAL UNIT WE HAVE
19 JIM SAUL AND HARLEY MARTIN, BOTH OF THEM WITH THE
20 ENVIRONMENTAL COMPLIANCE SECTION RESPONSIBILITY.

21 THIRDLY, THE AUTHOR, THE PROJECT MANAGER, THE
22 CONSULTANT FROM TETRA TECH, LOU MC MAYOR. THERE HE IS IN
23 THE BACK.

24 C.C. MELINSON FROM OUR REAL ESTATE DEPARTMENT, AND
25 MARTA MAESTAS FROM PUBLIC AFFAIRS. THERE SHE IS IN THE BACK

1 OF THE ROOM. AND ART CUETO, WHO IS THE PLANNING PROJECT
2 MANAGER FROM MTA AS WELL.

3 ON BEHALF OF THE TEAM MEMBERS, I WELCOME YOU TO
4 TONIGHT'S PUBLIC HEARING AGAIN. THIS IS THE FIRST OF TWO
5 PUBLIC HEARINGS THAT HAVE BEEN SCHEDULED FOR THIS PROJECT.
6 THE FOCUS OF THIS PUBLIC HEARING WILL BE TO TOUCH ON THE
7 ENVIRONMENTAL ISSUES ADDRESSED IN THE SECOND SUPPLEMENTAL
8 ENVIRONMENTAL IMPACT REPORT, ESPECIALLY THOSE DIRECTLY
9 AFFECTING THE LOCAL COMMUNITY. WE WILL FORMALLY RESPOND IN
10 WRITING TO ALL COMMENTS RECEIVED TONIGHT. IN ADDITION,
11 WRITTEN COMMENTS WILL BE ACCEPTED BY THE MTA UNTIL MAY 9,
12 1994, WHICH IS THE CLOSE OF THE PUBLIC REVIEW PERIOD FOR THE
13 SECOND SUPPLEMENTAL ENVIRONMENTAL IMPACT REPORT. THIS
14 REPORT WILL ALSO BE SUBJECT TO AN INDEPENDENT REVIEW BY OUR
15 METROPOLITAN TRANSPORTATION AUTHORITY BOARD.

16 BEFORE WE BEGIN, I'D LIKE TO DISCUSS THE
17 PROCEDURES WE WILL BE FOLLOWING THIS EVENING. IF YOU WOULD
18 LIKE TO SPEAK, PLEASE FILL OUT ONE OF THESE BLUE SPEAKER
19 REQUEST CARDS.

20 MARTA? MARTA'S HERE. MARTA WILL BE AT THE BACK
21 OF THE ROOM AND CAN ACCEPT THESE CARDS ANY TIME DURING THE
22 PUBLIC HEARING. IF YOU'LL TURN THEM IN TO HER, SHE CAN
23 BRING THEM ON DOWN, AND WE CAN HEAR YOUR COMMENTS BEFORE THE
24 PUBLIC HEARING IS CLOSED.

25 WE HAVE A COURT REPORTER PRESENT. SO PLEASE STATE

1 YOUR NAME AND ADDRESS AND HELP ME BY SPELLING YOUR NAME, IF
2 YOU WOULD, SO THAT WE GET IT ACCURATE ON THE RECORD.

3 YOU HAVE A MAXIMUM OF THREE MINUTES TO SPEAK, TO
4 MAKE YOUR COMMENTS. ART CUETO IS KEEPER OF THE STOPWATCH.
5 HE IS A HANDY DANDY LITTLE ELECTRONIC BEEPER THAT I ASKED
6 HIM TO TURN ON. WE'LL TRY NOT TO BE RUDE. BUT WHEN THE
7 BEEPER GOES OFF, I WILL ASK YOU TO CONCLUDE YOUR COMMENTS SO
8 THAT WE CAN HEAR FROM OTHERS AS WELL.

9 THE PUBLIC HEARING IS BEING HELD TO ENCOURAGE
10 PUBLIC PARTICIPATION DURING THE VARIOUS PHASES OF THE
11 PROJECT'S PLANNING. ALTHOUGH NOT REQUIRED BY THE CALIFORNIA
12 ENVIRONMENTAL QUALITY ACT, PUBLIC HEARINGS SUCH AS THESE
13 ALLOW FOR AND FACILITATE A PARTICIPATORY PROCESS, A PLANNING
14 PROCESS THAT ENCOURAGES INTERACTION WITH THE COMMUNITY AND
15 RESPONSIVENESS TO THE COMMUNITY AND YOUR INTERESTS BY THE
16 LEAD AGENCY ON IN PROJECT WHICH IS MTA.

17 IN THE SPRING OF 1990, THE L.A. COUNTY
18 TRANSPORTATION COMMISSION, A PREDECESSOR OF MTA, CERTIFIED
19 THE ORIGINAL ENVIRONMENTAL IMPACT REPORT FOR THE
20 PASADENA-LOS ANGELES LIGHT RAIL TRANSIT PROJECT. SINCE THAT
21 TIME, MODIFICATIONS TO THE ORIGINAL PROJECT HAVE BEEN MADE,
22 PLANNED, WHICH REQUIRE THE PREPARATION OF THE FIRST
23 SUPPLEMENTAL EIR WHICH WE PREPARED IN 1992. FURTHER
24 MODIFICATIONS AS WE'VE GONE FURTHER INTO DESIGN AND
25 REFINEMENTS NOW REQUIRE PREPARATION OF THIS SECOND

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TRANSPORTATION AND CIRCULATION:

THE RELOCATION OF THE PARK-AND-RIDE FACILITY FOR THE SIERRA MADRE STATION TO THE JOHNSON AND JOHNSON/MERCK SITE WILL POTENTIALLY IMPACT THE OPERATING CONDITIONS OF FIVE LOCAL INTERSECTIONS, AND FOUR INTERSECTIONS WOULD BE IMPACTED BY THE RELOCATION OF THE PARK AND RIDE LOT TO THE BUILDER'S EMPORIUM SITE.

CULTURAL RESOURCES:

LOSS OF POTENTIALLY HISTORIC STRUCTURES IN HIGHLAND PARK ALONG MARMION WAY, AND THE JOHNSON AND JOHNSON/MERCK FACILITY IN PASADENA WILL BE EVALUATED OR HAVE BEEN EVALUATED, AND POTENTIAL LOSS OR DAMAGE TO BURIED PREHISTORIC OR HISTORIC RESOURCES RESULTING FROM THE EXCAVATION FOR THE BELOW-GRADE SEPARATION, MIDWAY YARD ACCESS ROAD, AND ARROYO SECO BRIDGE FOUNDATIONS.

AT THIS TIME I'D LIKE TO SAY ONE MORE TIME IF YOU ARE INTERESTED IN PROVIDING PUBLIC TESTIMONY, PLEASE PICK UP ONE OF THE BLUE FORMS AT THE BACK AND TURN IT IN, AND WE'LL GET YOU TO SPEAK. THIS PUBLIC HEARING WILL CONTINUE ONLY UNTIL ALL OF THE PEOPLE WHO HAVE TURNED IN THEIR FORMS HAVE HAD THEIR THREE MINUTES, AND THEN I WILL FORMALLY CLOSE THE PUBLIC HEARING, AND WE CAN GO ON AND TALK UNTIL WE'RE KICKED OUT OF THE ROOM, I GUESS. I'M NOT SURE WHAT THE CLOSING TIME IS.

WITHOUT ANY FURTHER ADO, I'M GOING TO SIT DOWN,

1 AND I'M GOING TO CALL THE FIRST PERSON.

2 THE FIRST PERSON REQUESTING TO SPEAK IS ROBERT
3 ARGOTT, AND THAT'S SPELLED A-R-G-O-T-T, I BELIEVE, AND
4 FOLLOWING ROBERT WILL WILL BE DAVID KUEHN, K-U-E-H-N; IS
5 THAT CORRECT?

6 MR. ARGOTT: YES.

7 MR. LANTZ: LET'S START WITH ROBERT ARGOTT, AND IF
8 YOU WILL APPROACH THE MICROPHONE.

9 ONCE AGAIN, I'LL REMIND YOU, IF YOU DON'T FEEL
10 COMFORTABLE SPEAKING PUBLICLY TODAY, YOUR WRITTEN COMMENTS
11 ARE WELCOME PRIOR TO THE CLOSE OF THE PUBLIC COMMENT PERIOD.

12 MR. ARGOTT: MY NAME IS ROBERT ARGOTT. MY
13 PROPERTY IS LOCATED AT 200 TO 204 1/2 NORTH AVENUE 58. THE
14 NEW LIGHT RAIL APPARENTLY IS GOING TO TAKE THE ALLEY OR
15 RIGHT OF WAY NEXT TO SIX GARAGES, AND I WILL NO LONGER HAVE
16 ACCESS TO THESE GARAGES OR ANY WAY TO PROVIDE PARKING FOR
17 THE SIX HOUSES NEXT TO THEM. ALSO, I USE THOSE GARAGES FOR
18 STORAGE RIGHT NOW, AND THERE WOULD BE NO WAY OF USING THEM.
19 I BELIEVE THAT THOSE GARAGES WILL HAVE TO BE TORN DOWN.

20 YOU'LL HAVE TO PAVE AN AREA TO PROVIDE OFF-STREET
21 PARKING FOR THESE TENANTS, ALSO BECAUSE THAT 10 FOOT WIDE
22 RIGHT OF WAY IS GOING TO BE ALMOST LIKE A LOSS OF PROPERTY
23 TO ME FOR FUTURE BUILDING BECAUSE I WILL NOT BE ABLE TO USE
24 THE CORNER OR THE SIDE OF THE ALLEY WHICH WILL BE BLOCKED.

25 THAT'S BASICALLY WHAT MY COMMENTS ARE EXCEPT THAT

1 I'M FOR THE LIGHT RAIL.

2 MR. LANTZ: THANK YOU VERY MUCH.

3 SINCE THIS IS A PUBLIC HEARING, THERE'S NO NEED
4 FOR APPLAUSE OR "BOOS" OR ANY OTHER INTERACTION TONIGHT.

5 DAVID KUEHN FOLLOWED BY JOANNE BARKER,
6 B-A-R-K-E-R.

7 MR. KUEHN: MY NAME IS DAVID KUEHN, K-U-E-H-N. I
8 RESIDE AT 4159 CAMINO REAL, CITY OF LOS ANGELES.

9 I REQUEST THAT A CONCEPT WALL SITE PLAN OF THE
10 GRADE SEPARATION AT MARMION AND FIGUEROA BE INCLUDED IN THE
11 SUPPLEMENTAL ENVIRONMENTAL IMPACT REPORT PRIOR TO ITS
12 CERTIFICATION.

13 THAT'S MY ENTIRE COMMENT. THANK YOU.

14 MR. LANTZ: THANK YOU FOR YOUR COMMENT.

15 JOANNE BARKER FOLLOWED BY MR. PAT MOSER.

16 MS. BARKER: MY NAME IS JOANNE BARKER. I'M ONE OF
17 THE IMPACTED PARCELS BETWEEN AVENUE 55 AND 56. MY ADDRESS
18 IS 5518 MARMION WAY, AND I'M ALSO REPRESENTING THE INTERESTS
19 5522 MARMION WAY.

20 REGARDING THE PARCEL DESCRIPTIONS THAT ARE IN THE
21 ENVIRONMENTAL IMPACT REPORT OF PLOTS PA 248 AND 249, THERE
22 IS A MISREPRESENTATION OF THE ALLEY WIDTH. IT'S NOT 10 FOOT
23 AS PROPOSED OR EXPRESSED, AND ACCORDING TO YOUR OWN MAPS
24 IT'S 15 FOOT, ACCORDING TO THE PUBLIC WORKS MAPS.

25 AND I STILL HAVEN'T HAD THIS FIGURED OUT YET, BUT

1 COULD YOU PLEASE TELL ME WHY IT'S TAKEN FROM 1988 UNTIL NOW
2 TO DISCUSS THE FIRE DEPARTMENT ACCESSIBILITY OR ANY PUBLIC
3 SERVICE ACCESSIBILITY?

4 MR. LANTZ: WE WILL RESPOND IN WRITING IN THE
5 ENVIRONMENTAL IMPACT REPORT. THAT'S A GOOD QUESTION.

6 MS. BARKER: AND AT THIS POINT I DON'T REALLY HAVE
7 ANYTHING FURTHER.

8 MR. LANTZ: PAT MOSER, M-O-S-E-R, FOLLOWED BY I
9 THINK IT'S BOB EVINGER.

10 MR. MOSER: PAT MOSER, SOUTHERN CALIFORNIA TRANSIT
11 ADVOCATES. I'VE BEEN A RESIDENT OF NORTHEAST L.A. FOR MOST
12 OF MY LIFE, ABOUT 33 YEARS.

13 NOISE MITIGATION: THERE WILL BE SKIRTS ON THE
14 TRAINS. YOU DON'T HAVE -- WHEN YOU BUILD THE SOUND WALLS,
15 THEY DO NOT HAVE TO COVER THE TRAINS. THEY CAN GO ALL THE
16 WAY UP TO THE WINDOWS SO THERE'S NO NEED FOR YOU TO USE
17 SOUND WALLS. IN THE -- IN ADDITION, THE TRAINS WILL -- EACH
18 CAR WILL HAVE DIGITAL HORNS WHICH WILL MITIGATE THE LOUD
19 NOISE AS THE TRAIN APPROACHES A GRADE CROSSING.

20 THERE WILL BE NO ADVERSE IMPACTS ON BUS SERVICE.
21 EXAMPLE IS THE LONG BEACH BLUE LINE WHICH HAS SEEN A
22 DRAMATIC INCREASE IN BUS SERVICE SINCE THE LONG BEACH BLUE
23 LINE OPENED IN 1990; HOWEVER, THIS IS WHERE WE DISAGREE.
24 INSTEAD, AN UNDER PASS AT FIGUEROA STREET/MARMION WAY, THERE
25 SHOULD BE AERIAL FLY WAY WHICH WOULD FREE UP ADDITIONAL

1 MONEY TO SPEED UP THE CONSTRUCTION OF THE PASADENA BLUE
2 LINE. THE ONLY REASON THAT THE UNDER PASS IS BEING BUILT IS
3 BECAUSE OF PRESSURE FROM THE MOUNT WASHINGTON ASSOCIATION.
4 30 PEOPLE OUT OF THE THOUSANDS OF PEOPLE WHO LIVE ON MOUNT
5 WASHINGTON ARE FORCING THE TAXPAYERS TO PAY AN ADDITIONAL
6 AMOUNT OF MONEY FOR NOTHING. INSTEAD OF WASTING UP TO \$15
7 MILLION TO CONSTRUCT HOV LANES, THE BALANCE OF THAT \$15
8 MILLION SHOULD BE TRANSFERRED OVER WHICH WOULD HELP SPEED UP
9 CONSTRUCTION OF THE PASADENA BLUE LINE AND THE OTHER RAIL
10 LINES UNDER CONSIDERATION, SUCH AS THE EXPOSITION BLUE LINE.
11 THEN EXISTING MONEY IN THE TRANS-CAPITAL FUND WOULD BE
12 PRANSFERRED OVER TO THE OPERATING FUND SO THAT THERE WOULD
13 BE NO NEED TO HAVE THIS FOOLISH PUBLIC HEARING ON APRIL 23RD
14 TO CUT BACK DRASTICALLY BUS AND MAIL SERVICE AND TO INCREASE
15 AFFAIRS.

16 I WOULD LIKE TO SAY THAT NORTHEAST L.A. IS
17 VIRTUALLY UNANIMOUS IN FAVOR OF THE PASADENA BLUE LINE.
18 THERE IS ALMOST NOBODY WHO IS AGAINST IT, AND THAT INCLUDES
19 THE CITY OF SOUTH PASADENA AND THE CITY OF PASADENA. ALL
20 THREE AREAS ARE VIRTUALLY UNANIMOUS IN FAVOR.

21 AND BEFORE I GO, LET ME SAY THAT ON APRIL 23RD,
22 THE PUBLIC HEARING THAT I SPOKE OF TO DRASTICALLY CUT BACK
23 BUS AND RAIL SERVICE AND TO INCREASE FARES WILL BE HELD AT
24 10:00 A.M. AT THE BOARD OF SUPERVISOR HEARING ROOM, WHICH IS
25 AT 500 WEST TEMPLE STREET AT GRAND AVENUE, AND THAT'S

1 SATURDAY, APRIL 23RD, 10:00 A.M.

2 THANK YOU FOR YOUR TIME.

3 MR. LANTZ: THANK YOU.

4 BOB EVINGER, AND THEN I GUESS IT'S VICTOR
5 ARRADONDO.

6 MR. EVINGER: ROBERT EVINGER, E-V-I-N-G-E-R, AND I
7 LIVE AT 369 NORTH AVENUE 53 IN HIGHLAND PARK FOR THE PAST 18
8 YEARS.

9 I'D LIKE TO ADDRESS THE LAST SPEAKER. IT'S MORE
10 THAN 30 PEOPLE THAT WANTED THE GRADE TO BE UNDERNEATH --

11 (INAUDIBLE INTERRUPTION)

12 BASICALLY I'M HERE TO SPEAK ON BEHALF OF MYSELF AS
13 WELL AS THE HIGHLAND PARK HERITAGE TRUST. WE HAVE BEEN
14 WORKING WITH THE MTA FOR A NUMBER OF YEARS NOW TO MITIGATE
15 ANY PROBLEMS OF WHAT HAPPENED TO HISTORIC STRUCTURES WITHIN
16 HISTORIC CORRIDORS IN THE HIGHLAND PARK AREA, ESPECIALLY THE
17 MARMION WAY CORRIDOR WHICH CUTS DIRECTLY THROUGH THE CENTRAL
18 PART OF THE CENTRAL HISTORIC DISTRICT.

19 WHAT I GATHER IN READING SEIR IS WE CONSTANTLY
20 TALK ABOUT RELOCATION OF RESIDENTS AND THE DEMOLITION OF
21 STRUCTURES, AND SOME OF THE STRUCTURES ARE NOT HISTORIC AND
22 SOME OF THE STRUCTURES ARE HISTORIC, BUT WHAT I WOULD RATHER
23 HEAR THEM SAY IS A RELOCATION OF RESIDENTS AND A RELOCATION
24 OF HISTORIC STRUCTURES. THIS OPINION WAS EXPRESSED BY THE
25 CITY PLANNING COMMISSION LAST OCTOBER WHEN THEY APPROVED IN

1 HIGHLAND PARK OVERLAY ZONE ASKING MTA TO DO WHATEVER THEY
2 COULD TO MITIGATE ALL HISTORIC STRUCTURES BY MOVING THEM
3 WHENEVER THEY COULD, AND THEY EVEN ASKED FOR THE COMPLETE
4 RENOVATION OF THESE BUILDINGS.

5 I HAVE TALKED TO SEVERAL STAFF CONCERNING THAT,
6 AND I THINK WE CAN CONTINUE TO TALK ABOUT MOVING SOME OF
7 THESE STRUCTURES. OF PARTICULAR INTEREST TO US IS 5323, A
8 BROWN BUNGALOW STRUCTURE WHICH I'M TRYING TO RELOCATE IN
9 ECHO HAZE AREA IF POSSIBLE.

10 AND SEVERAL HOUSES THAT WERE TAKEN IN THE INITIAL
11 EIR, WHICH AREN'T ADDRESSED UNDER THE SEIR I THINK AT 5030
12 MARMION AND 130 AND 144 AVENUE 51 SHOULD BE LOOKED AT FOR
13 RELOCATION. AND WE WOULD WORK WITH THE COUNSEL OFFICES AND
14 WITH MTA TO FIND APPROPRIATE LOCATIONS FOR THOSE
15 RELOCATIONS.

16 I MUST -- WE MUST TAKE EXCEPTION TO THE TAKING OF
17 5318 AND 5 -- 5518 AND 5520 MARMION WAY, TWO VERY HISTORIC
18 HOMES, TO MAKE WAY FOR WHAT YOU SAY THE FIRE DEPARTMENT
19 NEEDS FOR A MAJOR U-TURN ABILITY. I WISH WE COULD FIND SOME
20 OTHER WAYS TO MITIGATE THAT BY FINDING OUT WHETHER THE FIRE
21 DEPARTMENT COULD TAKE OTHER AVENUES RATHER THAN DESTROYING
22 THOSE TWO HOMES.

23 I GUESS THAT'S PRETTY MUCH EVERYTHING I WANT. I
24 UNDERSTAND THAT SOME OF THE HOMEOWNERS THAT WERE SUPPOSEDLY
25 CONTACTED AND ACCEPTED AND WERE INTERESTED IN IT ACTUALLY

1 WERE NOT CONTACTED AND ARE NOT INTERESTED IN BEING BOUGHT
2 OUT AND RELOCATED.

3 I JUST WANT TO SAY IN CLOSING THAT WE HAVE ALWAYS
4 SUPPORTED THE MTA AND THE BLUE LINE THROUGH HIGHLAND PARK TO
5 PASADENA AND BEYOND. WE REALLY SUPPORT THE BELOW-GRADE
6 SEPARATION AT MARMION AND FIGUEROA, AND WE ALSO SUPPORT YOUR
7 RECONSIDERATION OF SOUND WALLS THROUGH THE MARMION WAY
8 CORRIDOR WHICH WOULD DIVIDE THE COMMUNITY AND BE DANGEROUS
9 TO BOTH THE ENGINEERS AND TO PEDESTRIANS. THANK YOU VERY
10 MUCH.

11 MR. LANTZ: THANK YOU.

12 VICTOR ARRADONDO. FOLLOWED BY CHARLES FISHER.

13 MR. ARRADONDO: MY NAME IS VICTOR ARRADONDO,
14 A-R-R-E-D-O-N-D-O. I LIVE ON 3625 MARMION WAY, AND MY
15 QUESTIONS ARE WHEN CONSTRUCTION WORKERS START ON THAT UNDER
16 PASS, WHERE ARE THEY GOING TO PARK? WHAT TIME THEY GOING TO
17 START? WHAT TIME THEY GOING TO STOP? WHO IS THE CONTACT
18 PERSON IN CASE WE GOT ANY COMPLAINTS? AND MACHINERY. HOW
19 MUCH IMPACT IS THAT GOING TO HAVE ON ALL THAT BLOCK IN
20 THERE?

21 I LIVE ONLY 50 FEET AWAY FROM THAT EXCAVATION, AND
22 I WOULD LIKE TO HAVE ANSWERS ON THESE QUESTIONS BECAUSE
23 SINCE 1986, WHEN I STARTED ON THIS DEAL, I HAVEN'T GOT
24 STRAIGHT ANSWERS YET.

25 SO PLEASE, IF YOU CAN DO IT THIS TIME, TELL ME.

1 MR. LANTZ: I THINK YOU'VE ASKED THE QUESTIONS AT
2 THE RIGHT PLACE, AND WE'LL RESPOND IN WRITING.

3 CHARLES FISHER, FOLLOWED BY ROSE, AND I'LL HAVE
4 YOU PRONOUNCE YOUR LAST NAME.

5 MS. XOCHIAUA: XOCHIAUA.

6 MR. FISHER: MY NAME IS CHARLIE FISHER. I'M THE
7 CHAIRMAN OF THE HIGHLAND PARK NEIGHBORHOOD ASSOCIATION. I'M
8 JUST SPEAKING AGAIN TO REITERATE THE NEIGHBORHOOD
9 ASSOCIATION'S SUPPORT OF THE BLUE LINE THROUGH HIGHLAND PARK
10 AND BEYOND. IT'S LONG OVERDUE. MY PERSONAL OPINION IS THEY
11 NEVER SHOULD HAVE RIPPED OUT THE RED CARS AND YELLOW CARS IN
12 THE FIRST PLACE. BUT WE'RE HERE NOW.

13 WE DO HAVE QUESTIONS AGAIN REGARDING SOME OF THE
14 TAKINGS AND OF COURSE THE RELOCATION. MR. EVINGER SPOKE
15 ABOUT THIS, AND SO DID MISS BARKER OVER AT 5518. THOSE TWO
16 IN PARTICULAR WE ARE VERY CONCERNED ABOUT BECAUSE THEY ARE
17 BOTH HISTORIC HOMES, AND WHEN WE INITIALLY DID OUR OWN
18 STUDY, WE DIDN'T EVEN THINK THOSE HOMES WOULD BE TAKEN
19 BECAUSE THEY BOTH HAD SUCH BIG SETBACKS. WE DIDN'T THINK
20 THERE WOULD BE SUCH A MASSIVE CUT IN THE ALLEY SO THE FIRE
21 TRUCKS COULD DO THE U-TURN.

22 THE OTHER -- THERE IS A THIRD ALLEY THAT GOES
23 THROUGH THAT BLOCK AND BISECTS IT. OUR FEELING IS THAT
24 THERE IS PLENTY OF ACCESS TO THAT PARTICULAR BLOCK, AND THAT
25 BLOCK HAS MUCH MORE ACCESS THAN MOST BLOCKS DO IN THE

1 HIGHLAND PARK AREA. WE DON'T FEEL THAT THE TAKING OF THESE
2 TWO HOUSES IS ANYWHERE NECESSARY.

3 THE OTHER ONES IN PARTICULAR I JUST WANT TO REMIND
4 THE MTA ABOUT THE AVENUE 61 POWER SUBSTATION, THAT WE ARE
5 ASKING THAT THE POSSIBILITY OF RELOCATING THAT STATION TO
6 BESIDE A PORTION OF AVENUE 61, THE INDUSTRIAL PROPERTY THAT
7 IS LOCATED NEXT DOOR, WHICH AT THE TIME THAT THE ORIGINAL
8 EIR WAS DONE WAS OPERATED BY AQUA-VEND WATER. BUT THEY HAVE
9 SINCE MOVED OUT, AND THIS PROPERTY HAS BEEN VACATED BY
10 ALMOST THREE YEARS NOW AND DETERIORATING.

11 THIS IS SOMETHING THAT CAN BE LOOKED AT, AND WE
12 THEREFORE WOULD NOT HAVE TO REMOVE HISTORIC HOUSING. AND
13 JUST A REMINDER. I KNOW THAT THERE A A LOT MORE THAN 30
14 FAMILIES IN THE MOUNT WASHINGTON ASSOCIATION.

15 MR. LANTZ: ROSE. AND THAT'S ALL THE THE FORMS I
16 HAVE. SO IF ANY OF YOU WOULD LIKE TO TESTIFY, PLEASE TURN
17 IN YOUR FORMS. AND IN ADDITION, ON THE BACK OF THIS BLUE
18 FORM, I'VE JUST LEARNED IS A PLACE WHERE YOU CAN ACTUALLY
19 WRITE YOUR COMMENTS TONIGHT. SO WE'RE EVEN PROVIDING YOU
20 THE PAPER AND THE LINE.

21 A. ROSE XOCHIAUA, X-O-C-H-I-A-U-A. I LIVE AT 207 NORTH
22 AVENUE 53 AND HAVE BEEN THERE FOR EIGHT YEARS. I'VE BEEN IN
23 THE COMMUNITY FOR 19 YEARS. I, TOO, LOOK FORWARD TO THE
24 METRO LINE COMING THROUGH HIGHLAND PARK. IT'S LONG OVERDUE
25 I REALIZE. AND ONE TO MY SURPRISE, I ORDERED THE EIR

1 REPORT, AND I DID NOTICE OUR ADDRESS UP THERE, WHICH IS THE
2 FIRST I'VE EVER SEEN. IT'S -- I'VE NEVER BEEN NOTIFIED OF
3 ANYTHING OR ANY INTEREST TO OUR PROPERTY.

4 SECONDARY, I'M OPPOSING THE CLOSURE OF AVENUE 53.
5 MY MAIN CONCERN IS THE CRIME PROBLEM ON AVENUE 53 AND MONTA
6 VISTA. BY CLOSING THAT STREET, IT WILL DEFINITELY CLOSE OUR
7 IMMEDIATE STREET OFF TO THE ENTIRE COMMUNITY AND OPENING UP
8 INTO A CRIME AREA THAT WE'D RATHER AVOID RATHER THAN BE
9 CONFRONTED WITH. LOCKING US OUT WOULD BE AGAINST EVERYTHING
10 I CAN THINK OF. WE WORKED VERY HARD TO KEEP THAT STREET IN
11 ORDER AND HAVE WORKED WITH THE LAW ENFORCEMENT VERY MUCH.
12 SO TO SEE IT BLOCKED OFF, I JUST DON'T FIND IT BEING JUST.

13 SECONDARY, BY CLOSING AVENUE 53, I DON'T SEE WHERE
14 IT WOULD SPEED UP THE TRAIN ANY MORE BY MAYBE A FRACTION OF
15 A SECOND OR SO I CAN'T IMAGINE.

16 OKAY. AND THAT'S MY TESTIMONY.

17 MR. LANTZ: ANYONE ELSE? NO OTHER REQUESTS TO
18 SPEAK?

19 WELL, THANK YOU ALL FOR COMING TONIGHT. WE'LL BE
20 DOING AN OPEN HOUSE, AND I DECLARE THE PUBLIC HEARING
21 FORMALLY CLOSED.

22
23 (PROCEEDINGS CONCLUDED AT 7:38 P.M.)
24

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REPORTER'S CERTIFICATE

I CERTIFY THAT THE FOREGOING IS A CORRECT
TRANSCRIPT FROM THE RECORD OF PROCEEDINGS
IN THE ABOVE-ENTITLED MATTER.

Mark Schweitzer
MARK SCHWEITZER

DATE: April 29, 1994

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LOS ANGELES COUNTY
METROPOLITAN
TRANSPORTATION AUTHORITY
PUBLIC HEARING

PACIFIC HASTINGS RANCH LIBRARY
3325 EAST ORANGE GROVE BOULEVARD
PASADENA, CALIFORNIA

WEDNESDAY, APRIL 20, 1994

COMMENCING AT 6:30 P.M.

REPORTED BY: MARK SCHWEITZER

1 PASADENA, CALIFORNIA; WEDNESDAY, APRIL 13, 1994

2 6:30 P.M.

3 -000-

4
5 MR. CUETO: I'M GOING TO GO AHEAD AND START WITH
6 THE FIRST PART OF TONIGHT'S MEETING. BEFORE I GET STARED
7 STARTED, BEFORE I ACTUALLY START WITH THE -- IF ANYONE HAS
8 ANY COMMENTS THAT THEY WOULD LIKE TO MAKE AS TO THE
9 SUPPLEMENTAL ENVIRONMENTAL IMPACT REPORT WHICH HAS BEEN
10 PRODUCED FOR BY THE MTA FOR THE PASADENA BLUE LINE PROJECT,
11 WOULD YOU PLEASE FILL OUT ONE OF THESE BLUE CARDS? MARTA
12 MAESTAS HAS THE CARDS AND WILL MAKE THEM AVAILABLE FOR YOU.
13 IF YOU WOULD LIKE TO SPEAK, YOU MUST FULL OUT ONE OF THESE
14 CARDS. IT IS IMPORTANT THAT YOU DO SO. SO WITH THAT IN
15 MIND, LET'S GET STARTED WITH THE PROCEEDINGS FOR TONIGHT'S
16 MEETING.

17 MY NAME IS ART CUETO. I'M A PROJECT MANAGER WITH
18 THE METROPOLITAN TRANSPORTATION AUTHORITY, THE AGENCY WHICH
19 IS RESPONSIBLE FOR THE CONSTRUCTION OF THE BLUE LINE. WITH
20 ME THERE ARE SEVERAL STAFF MEMBERS PRESENT WHO ARE
21 PARTICIPATING IN THE PLANNING AND CONSTRUCTION OF THIS
22 PROJECT. AT THIS TIME I'D LIKE INTRODUCE THEM TO YOU.

23 OVER THERE TO MY RIGHT IS HARLEY MARTIN. HE'S
24 WITH THE MTA, AN ENVIRONMENTAL SPECIALIST. NEXT TO HIM IS
25 C.C. MELINSON. SHE'S WITH MTA REAL ESTATE. IN THE BACK --

1 OH, MY BOSS, STEVE, IS HERE. STEPHEN LANTZ, HE'S THE AREA
2 DIRECTOR FOR THE SAN GABRIEL VALLEY AREA TEAM. ALSO IN THE
3 BACK IS MARTA MAESTAS, WHO IS MTA PUBLIC AFFAIRS, AND ALSO
4 FRED PIERSON. THERE'S FRED. HE'S OUR TRAFFIC CONSULTANT
5 FOR THE PROJECT.

6 SO WITH THAT IN MIND, WE'LL GO AHEAD.

7 DO YOU WANT TO COME UP HERE STEVE, OR DO YOU WANT
8 ME TO DO IT?

9 WITH THAT IN MIND, I'LL HAVE STEVE TAKE OVER.

10 WELL, BEFORE I DO THAT IF ANYBODY DESIRES ANY
11 TRANSLATION OF THESE PROCEEDINGS TO SPANISH, WE HAVE OUR
12 SPANISH INTERPRETER HERE. HER NAME IS LINDA KRAUSEN.

13 MR. LANTZ: THIS IS A BIT OF A REUNION FOR ME. I
14 WORKED MY WAY THROUGH HIGH SCHOOL IN THIS LIBRARY AS A PAGE
15 AND A CLERK. SO I THOUGHT I COULD GET OUT HERE WITH ALL DUE
16 SPEED, AND I APOLOGIZE FOR THE TRAFFIC THAT HAS OCCURRED IN
17 THE LAST 20 OR 30 YEARS. IT'S A LITTLE SLOWER GETTING HERE
18 NOW THAN IT WAS WHEN I WAS A KID, EVEN WITH THE FREEWAY THAT
19 WASN'T HERE WHEN I WAS A KID.

20 ON BEHALF OF THE TEAM MEMBERS, I'D ALSO LIKE TO
21 WELCOME YOU HERE TODAY TONIGHT. THIS IS A FORMAL PUBLIC
22 HEARING IN THAT WE'VE ISSUED A SECOND SUPPLEMENTAL
23 ENVIRONMENTAL IMPACT REPORT. WE ARE HOLDING THIS PUBLIC
24 HEARING IN ADDITION TO ANOTHER ONE THAT WAS HELD LAST WEEK
25 TO RECEIVE PUBLIC COMMENT.

1 DURING THE FORMAL PUBLIC HEARING, WE WON'T BE
2 GETTING INTO DIALOGUE WITH YOU. WE WON'T BE ANSWERING
3 QUESTIONS; HOWEVER, THE STAFF WILL BE HERE AFTER THE FORMAL
4 HEARING PERIOD AFTER YOU'VE MADE YOUR PUBLIC COMMENTS, AND
5 WE CAN TALK TO YOU ABOUT IT. BUT DURING THE PUBLIC HEARING
6 UNDER THE CALIFORNIA ENVIRONMENTAL QUALITY ACT, WE DO NEED
7 TO HAVE IT BE YOUR COMMENTS THAT ARE ACCURATELY RECORDED.
8 WE WILL THEN PREPARE WRITTEN RESPONSES TO THOSE COMMENTS
9 THAT YOU MAKE, AND WE WILL REPLY IN A FINAL ENVIRONMENTAL
10 IMPACT REPORT TO CONSIDER YOUR COMMENTS AND TO REPLY TO
11 THEM.

12 THE PROCEDURES THAT WE'LL BE FOLLOWING THIS
13 EVENING ARE FAIRLY STRAIGHTFORWARD. IF YOU'D LIKE TO SPEAK
14 -- I SEE SOME OF YOU HAVE ALREADY TURNED IN REQUEST TO SPEAK
15 CARDS, THE BLUE CARDS. ON THE BACK OF THESE CARDS ARE
16 WRITTEN COMMENT CARDS. SO IF YOU DON'T FEEL LIKE YOU WANT
17 TO MAKE A SPEECH IN FRONT OF THE GROUP BUT YOU WANT YOUR
18 COMMENTS NOTED, PLEASE WRITE THEM DOWN AND TURN IN THE CARD
19 NOW.

20 THE PUBLIC COMMENT PERIOD WILL ALSO BE EXTENDED
21 UNTIL MAY 9TH. SO IF YOU HEAR SOME THINGS HERE TONIGHT THAT
22 GET YOUR BRAIN CELLS FLOWING, AND YOU WANT TO SIT DOWN AND
23 WRITE US A MORE LENGTHY LETTER WITH SPECIFIC CONCERNS THAT
24 YOU'D LIKE US TO ADDRESS AS WE COMPLETE THE ENVIRONMENTAL
25 DOCUMENTATION, PLEASE FEEL FREE TO SUBMIT THOSE TO US BY MAY

1 9TH, AND THAT NEEDS TO BE SENT TO THE L.A. COUNTY
2 METROPOLITAN TRANSPORTATION AUTHORITY AT 8189 WEST 7TH
3 STREET, L.A. 90017.

4 A LITTLE BACKGROUND ON THIS HEARING. IN THE
5 SPRING OF 1990, THE L.A. COUNTY TRANSPORTATION COMMISSION
6 CERTIFIED AN ENVIRONMENTAL IMPACT REPORT FOR THE
7 PASADENA-LOS ANGELES LIGHT RAIL TRANSIT PROJECT.
8 MODIFICATIONS THAT HAVE BEEN MADE TO THE ORIGINAL PROJECT
9 HAVE REQUIRED THE PREPARATION, FIRST, OF A SUPPLEMENTAL EIR
10 IN 1992.

11 ADDITIONAL DESIGN WORK AND ENGINEERING HAVE
12 UNCOVERED FURTHER MODIFICATIONS WHICH NOW REQUIRE A SECOND
13 SUPPLEMENTAL EIR. PERHAPS THIS WILL BE OUR LAST BEFORE WE
14 ACTUALLY APPROVE A PROJECT AND GET DOWN TO CONSTRUCTING IT.
15 BUT AT THIS POINT THE CHANGES AND MODIFICATIONS THAT HAVE
16 BEEN MADE ARE SUCH THAT WE ARE GOING THROUGH A FORMAL
17 CIRCULATION OF A DRAFT ENVIRONMENTAL IMPACT REPORT
18 SUPPLEMENT. THE INTENT OF THIS SUPPLEMENTAL EIR IS TO
19 ADDRESS ONLY THE INFORMATION NECESSARY TO MAKE THE
20 PREVIOUSLY CERTIFIED DOCUMENTS ADEQUATE FOR THE PROJECT AS
21 IT'S BEEN REVISED.

22 THIS SUPPLEMENTAL EIR IS PREPARED SO THAT THAT NEW
23 INFORMATION AND THE DESIGN ALTERNATIVES COULD BE ANALYZED
24 AND REVIEWED BY THE PUBLIC PRIOR TO US INCORPORATING THEM
25 WITH MITIGATIONS INTO OUR PROJECT.

1 THE PROPOSED PROJECT CONSISTS OF SEVEN AREAS OF
2 MODIFICATION TO THE ADOPTED LIGHT RAIL PROJECT WHICH REQUIRE
3 ANALYSIS IN THIS DOCUMENT.

4 THEY INCLUDE THE ACQUISITION OF SIX ADDITIONAL
5 PROPERTIES AND UP TO 50 MINOR CURB CUTS ALONG MARMION WAY
6 BETWEEN AVENUES 50 AND 60, TO PROVIDE IMPROVED ACCESS FOR
7 EMERGENCY VEHICLES ALONG THIS PORTION OF THE ALIGNMENT;

8 CHANGING THE OPERATIONAL MODE FROM STREET RUNNING
9 TO SEMI-EXCLUSIVE RIGHT OF WAY BETWEEN AVENUES 51 AND 61
10 WITH RESULTING MODIFICATIONS TO GATED CROSSINGS, WARNING
11 SIGNALS, AND CLOSURE OF AT-GRADE STREET CROSSINGS AT AVENUES
12 51, 53, 55, 58, AND 61;

13 REEVALUATION OF SOUND WALL MITIGATION MEASURES;
14 AND IMPORTANT TO THIS AREA, ALTERNATIVE LOCATIONS
15 TO THE PREVIOUSLY CLEARED SPACE BANK FACILITY FOR THE SIERRA
16 MADRE VILLA STATION'S PARK-AND-RIDE FACILITY. ALTERNATIVE
17 SITES INCLUDE THE JOHNSON AND JOHNSON/MERCK, OR THE
18 BUILDER'S EMPORIUM PROPERTIES;

19 AND THEN FINALLY A BELOW-GRADE SEPARATION OF THE
20 INTERSECTION OF MARMION WAY AND FIGUEROA STREET.

21 THE SUPPLEMENTAL EIR ADDRESSES A NUMBER OF
22 ENVIRONMENTAL TOPICS INCLUDING LAND USE COMPATIBILITY,
23 TRAFFIC, AIR QUALITY, NOISE, VISUAL, CULTURAL RESOURCES, AND
24 OTHERS. AT THIS TIME I'D LIKE TO SUMMARIZE THE SIGNIFICANT
25 AND UNAVOIDABLE IMPACTS ASSOCIATED WITH THE PROPERTY TAKES,

1 THE TRAIN OPERATION SCENARIOS, THE STREET CLOSURES, THE
2 GRADE SEPARATIONS, AND THE ALTERNATIVE LOCATIONS FOR THE
3 SIERRA MADRE VILLA STATION PARK-AND-RIDE LOT.

4 THEY ARE NOISE AND VIBRATION:

5 THE REEVALUATION OF SOUND WALLS ALONG MARMION WAY
6 AND IN SOUTH PASADENA, ALONG WITH SEMI-EXCLUSIVE OPERATIONS
7 WILL RESULT IN POTENTIAL NOISE AND VIBRATION IMPACTS.

8 THE CONSTRUCTION OF THE BELOW-GRADE SEPARATION AT
9 THE INTERSECTION OF FIGUEROA STREET AND MARMION WAY MAY
10 RESULT IN SIGNIFICANT SHORT-TERM NOISE IMPACTS DUE TO
11 CONSTRUCTION.

12 TRANSPORTATION AND CIRCULATION:

13 THE RELOCATION OF THE PARK-AND-RIDE FACILITY FOR
14 THE SIERRA MADRE STATION TO THE JOHNSON AND JOHNSON/MERCK
15 SITE WILL POTENTIALLY IMPACT THE OPERATING CONDITIONS OF
16 FIVE LOCAL INTERSECTIONS AND FOUR INTERSECTIONS WOULD BE
17 IMPACTED BY THE RELOCATION OF THE PARK-AND-RIDE LOT TO THE
18 BUILDER'S EMPORIUM SITE.

19 THERE'S A POTENTIAL LOSS OF HISTORIC STRUCTURES IN
20 HIGHLAND PARK ALONG MARMION WAY, AND THE JOHNSON AND
21 JOHNSON/MERCK FACILITY IN PASADENA THAT MAY BE LOST.

22 POTENTIAL FOR LOSS OR DAMAGE TO BURIED PREHISTORIC
23 AND/OR HISTORIC RESOURCES MIGHT RESULT FROM THE EXCAVATION
24 OF THE BELOW-GRADE SEPARATION, MIDWAY YARD ACCESS ROAD, AND
25 ARROYO SECO BRIDGE FOUNDATIONS THAT NEED TO BE

1 RECONSTRUCTED.

2 THIS SAME TESTIMONY OR SAME INTRODUCTION WAS GIVEN
3 AT THE OTHER PUBLIC HEARING. SO THERE'S ISSUES THAT ARE OF
4 CONCERN IN ALL STRETCHES OF THE PROJECT WITH THIS SECOND
5 ENVIRONMENTAL.

6 AT THIS TIME I WOULD LIKE TO OPEN THE PUBLIC
7 HEARING TO COMMENTS. YOU'LL EACH HAVE UP TO THREE MINUTES
8 FOR YOUR COMMENTS. ART HERE HAS HIS TRUSTY STOPWATCH THAT
9 GOES BEEP, BEEP, BEEP. LAST TIME WE WERE IN AN AUDITORIUM
10 AND THE BELLS WENT OFF. BUT I THINK WHAT WE'D LIKE -- IF
11 YOU HEAR THE BEEP, BEEP, BEEP, I'LL SIMPLY ASK YOU TO
12 CONCLUDE SO THAT OTHER TESTIMONY CAN BE HEARD.

13 ONCE I HAVE FINISHED WITH THE BLUE REQUEST TO
14 SPEAK CARDS THAT ARE HERE, I'LL ASK FOR ANY ADDITIONAL CARDS
15 OR ANY OTHER ADDITIONAL SPEAKERS. IF THERE ARE NONE, WE'LL
16 CLOSE THE PUBLIC HEARING. IN ADDITION, AS I SAID BEFORE, IF
17 YOU DIDN'T GET A CHANCE TO SPEAK, FEEL FREE TO WRITE US THE
18 WRITTEN NOTE OR SUBMIT WRITTEN COMMENTS BEFORE MAY 9TH.

19 FINALLY, WHEN YOU DO COME UP TO SPEAK, PLEASE HELP
20 OUR COURT REPORTER, WHO IS TAKING THIS DOWN AS VERBATIM AS
21 HE CAN, BY SPELLING YOUR LAST NAME. IF YOU ARE AFFILIATED
22 WITH ANY ORGANIZATION, WHOSE VIEW YOU REPRESENT OFFICIALLY.
23 PLEASE GIVE US THE NAME OF THAT ORGANIZATION SO THAT WE CAN
24 REFLECT THE FACT THAT IT'S AN ORGANIZATIONAL OPINION RATHER
25 THAN A PERSONAL POSITION.

1 OTHER THAN THAT, I THINK THAT AT THIS TIME THREE
2 CARDS THAT I HAVE SO FAR ARE FRED ZAPATA, TIMOTHY PRICE AND
3 CLIFF BENEDICT: SO LET'S START WITH FRED. AND THERE'S A
4 MICROPHONE OVER HERE ON YOUR RIGHT SIDE. SO IF YOU COME UP
5 TO THE MICROPHONE AND SPEAK INTO THE MICROPHONE, THAT WOULD
6 HELP US ALL OUT. IS FRED ZAPATA HERE?

7 OH, HE DIDN'T WISH TO SPEAK? WE'RE A THIRD DOWN.
8 SECOND, TIMOTHY PRICE.

9 MR. PRICE: MY NAME IS TIMOTHY PRICE, I'M
10 PRESIDENT OF THE DAISYVILLE HOME OWNERS ASSOCIATION. EVEN
11 THOUGH WE REALIZE THAT THE EIR REPORT DOES NOT REQUIRE YOU
12 TO TAKE IN OTHER PROSPECTIVE CONDITIONS THAT MIGHT HAPPEN IN
13 OUR NEIGHBORHOOD, ALBEIT THE DATA TAPE PROPERTY PASADENA
14 SKILL CENTER, WE FEEL THAT WE WANT TO BE ON RECORD THAT THIS
15 SUPPLEMENTAL ONLY EXPRESSES ONE VIEW, AND THAT'S OF THE
16 TRAFFIC PATTERNS IF THE LIGHT RAIL AND WHEN THE LIGHT RAIL
17 GOES IN.

18 IT DOES NOT EXPRESS TRAFFIC PATTERNS OF THE PCC
19 SKILL CENTER OR WHAT'S GOING TO BE DEVELOPED ON THE
20 PROPERTY; THEREFORE, WE FEEL EVEN THOUGH OFFICIALLY IT'S A
21 CORRECT DOCUMENT, UNOFFICIALLY IT'S FLAWED BECAUSE WE STILL
22 HAVE OTHER DOCUMENTS TO TAKE INTO CONSIDERATION.

23 THANK YOU.

24 MR. LANTZ: OKAY. CLIFF BENEDICT.

25 MR. MBENEDICT: I HAVE SEVERAL COMMENTS TO MAKE

1 REGARDING YOUR REPORT.

2 FIRST OF ALL, I'D LIKE TO CONGRATULATE YOU ON
3 DOING THE TRAFFIC STUDIES THAT WE REQUESTED BE DONE BACK IN
4 1991, LATE 1991 AND EARLY 1992.

5 WE FINALLY FOUND THEM IN THIS LATEST REPORT.

6 IT DOES DEEPLY CONCERN MYSELF, HOWEVER, THAT THESE
7 TRAFFIC REPORTS INDICATE PRECISELY WHAT WE FORESAW TWO OR
8 THREE YEARS AGO, AND THAT WAS THAT WE WERE GOING TO HAVE
9 SIGNIFICANT TRAFFIC IMPACTS AT FOUR MAJOR LOCATIONS IN OUR
10 EAST END OF PASADENA, BEING COLORADO AND ROSEMEAD, FOOTHILL
11 AND ROSEMEAD, SIERRA MADRE AND FOOTHILL, AND -- WELL, ONE
12 OTHER ONE.

13 IT'S ON YOUR MAP.

14 LEVEL "F" MITIGATED IS NOT ACCEPTABLE. I MEAN
15 REALLY, YOU'RE LOOKING AT MAJOR DELAYS IN INTERSECTIONS, AND
16 THAT'S BY YOUR OWN DEFINITION.

17 "E" IS BAD ENOUGH WHEN YOU GET OCCASIONAL DELAYS,
18 BUT "F" IS GRID LOCK, AND I THINK SOMETHING HAS TO BE DONE
19 FURTHER IN THE WAY OF MITIGATION TO LOOK AT WHAT
20 ALTERNATIVES CAN BE MADE IN ORDER TO ALLEVIATE THAT TRAFFIC
21 PROBLEM.

22 YOU LOOKED AT CO2 EMISSIONS, AND THOUGH YOU DID
23 SOME WORK ON THAT ONE, THE -- BY YOUR OWN STANDARDS THERE
24 ARE TIMES WHEN YOU ARE YOU BARELY, BARELY WITHIN THE MAXIMUM
25 ACCEPTABLE LEVEL OF CO2 EMISSIONS IN AN EIGHT-HOUR PERIOD,

1 8.8 PARTS PER MILLION, WHEN THE MAXIMUM IS 9. AND I THINK
2 THAT'S COMING AWFULLY CLOSE. AS A MATTER OF FACT, I WOULD
3 ALMOST CHALLENGE YOU TO GIVE US THE DETAILED ANALYSIS OF HOW
4 THAT WAS CALCULATED BECAUSE I COULD THINK THAT YOU COULD
5 SLIP OVER THE OTHER SIDE OF 9 JUST AS EASILY AS YOU COULD
6 SLIP UNDER 9 KNOWING WHAT THE LEVEL IS.

7 SO I WOULD ASK YOU TO TAKE A LOOK AT THAT.

8 AND THE LAST THING IS THAT THIS WEEK I ACQUIRED A
9 COPY, ALBEIT IT WAS DONE BY I GUESS SOME STAFF ENGINEER,
10 THAT GAVE PROPOSED LAYOUT FOR THE JOHNSON AND JOHNSON SITE.
11 HERE IT IS. IT SAYS THE CONSTRUCTION OF THE PARK-AND-RIDE
12 FACILITY WOULD BE CONSTRUCTED AT THE PROPOSED JOHNSON AND
13 JOHNSON WORK SITE OR AT THE ALTERNATE BUILDER'S EMPORIUM
14 SITE. AT EITHER SITE, PROPOSED THREE STORY STRUCTURE WOULD
15 BE CONSTRUCTED WITH TWO AND A HALF LEVELS FOR THE PARKING OF
16 A FEW CAR'S AND A HALF LEVEL OF GRADE FOR BUS LOADING,
17 UNLOADING AND LAYOVER.

18 THIS DRAWING -- AND IT'S UNDATED -- PROPOSED A
19 THOUSAND CAR PARK ENCOMPASSING EVERYTHING FROM SIERRA MADRE
20 VILLA TO HALSTEAD, TAKING AWAY A PROPERTY THAT DOES NOT
21 BELONG TO JOHNSON AND JOHNSON. IT BELONGS TO SOME OTHER
22 INDIVIDUAL THAT BOUGHT IT. AND I WOULD CALL TO YOUR
23 ATTENTION THAT ALL THROUGH THE DISCUSSIONS OF THIS
24 DEVELOPMENT OF THE SIERRA MADRE TERMINAL -- YEAH, TERMINAL,
25 WE TALKED ABOUT HAVING MULTIPLE STORY PARK FACILITIES

1 PROVIDED THAT WOULD ALSO THEN PROVIDE ROOM FOR BUSINESSES TO
2 BE DEVELOPED THAT WOULD BE COMPATIBLE TO THE TYPE OF
3 BUSINESS THAT YOU WOULD ASSOCIATE WITH EGRESS AND SO FORTH
4 FROM A STATION.

5 IF YOU COVER THE WHOLE DARN THING WITH PARKING
6 LOT, THAT WON'T LEAVE ANY ROOM TO DO THAT. SO WE APPRECIATE
7 YOUR TAKING THAT INTO CONSIDERATION.

8 THANK YOU.

9 MR. LANTZ: OKAY. IS THERE ANYBODY ELSE WHO WOULD
10 WISH TO TURN IN A REQUEST TO SPEAK SLIP, A BLUE SLIP?

11 HEARING NONE, THEN I DEEM THE PUBLIC HEARING
12 CLOSED AND THANK YOU ALL FOR COMING. I KNOW THERE'S ANOTHER
13 MEETING FOLLOWING, BUT WE'LL BE IN THE BACK, AND WE CAN TALK
14 ONE ON ONE ABOUT -- INFORMALLY ABOUT SOME OF THE ISSUES THAT
15 HAVE BEEN RAISED. AND ANY OF YOU WHO WOULD LIKE TO TALK
16 INFORMALLY OFF THE RECORD TO US ABOUT CONCERNS THAT YOU
17 HAVE, THAT'S FINE. IF YOU WANTED TO GET A LITTLE MORE
18 CONVERSATION BEFORE WRITING YOUR COMMENTS, WE'D BE HAPPY TO
19 HELP YOU GET A LITTLE MORE ANALYSIS BEFORE YOU WRITE IT
20 DOWN, TOO.

21 SO THANKS AGAIN FOR COMING TONIGHT, AND THE
22 HEARING IS CLOSED.

23
24 (PROCEEDINGS CONCLUDED AT 6:53 P.M.)

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REPORTER'S CERTIFICATE

I CERTIFY THAT THE FOREGOING IS A CORRECT
TRANSCRIPT FROM THE RECORD OF PROCEEDINGS
IN THE ABOVE-ENTITLED MATTER.

Mark Schweitzer
MARK SCHWEITZER

DATE: April 29, 1994

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