

Eco-Rapid Transit, formerly known as the Orangeline Development Authority, is a joint powers authority (JPA) created to pursue development of a transit system that moves as rapidly as possible, uses grade separation as appropriate, and is environmentally friendly and energy efficient. The system is designed to enhance and increase transportation options for riders of this region utilizing safe, advanced transit technology to expand economic growth that maximizes ridership in Southern California. The Authority is composed of the following public agencies:

- City of Artesia
- City of Bell
- City of Bell Gardens
- City of Bellflower
- City of Cudahy
- City of Downey
- City of Glendale
- City of Huntington Park
- City of Maywood
- City of Paramount
- City of South Gate
- City of Vernon
- Burbank-Glendale-Pasadena Airport Authority

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Cristian Markovich
Council Member
City of Cudahy
- Executive Director
Michael R. Kodama
- General Counsel
Teresa L. Highsmith
- Ex-Officio
William Rawlings
City Manager Representative

AGENDA REPORT

TO: Members of Eco-Rapid Transit
FROM: Michael Kodama, Executive Director
DATE: August 8, 2018
SUBJECT: **UPDATE AND/OR ACTION REGARDING ECO-RAPID TRANSIT AND WEST SANTA ANA BRANCH ENVIRONMENTAL PROCESS**

Public comments on items on the agenda will be taken at the time the item is called and are limited to 3 minutes per speaker

ISSUE

The attached draft letter is for consideration as the Eco-Rapid Transit comment letter on the rescoping of the Eco-Rapid/West Santa Ana Branch environmental review process. This letter will also be submitted to the Gateway Cities COG Board of Directors.

BACKGROUND

In June, the LACMTA Board of Directors approved the designation of two northern alignments options for further study in the environmental documents. Both the Gateway Cities COG Board and the Eco-Rapid JPA membership sent in letters in support of the staff recommendation and coordinated testimony.

The selection of these two alignments requires a rescoping of the project as they represent a significant change in project design. Rescoping presents an additional opportunity for residents, businesses and other interested parties to comment on potential impacts, benefits and other aspects of the project.

There were Scoping sessions held in July including two in the project area. The opportunity to respond or comment on the project is open until August 24th.

RECOMMENDATION

It is recommended that the Board:

1. Discuss information presented, make any changes and approve the letter for submittal and/or
2. Receive and file the item

Teresa Wong

Project Manager, Metro
One Gateway Plaza, M/S 99-22-4
Los Angeles, CA 90012

Re: **Comments on Rescoped West Santa Ana Branch Light Rail Corridor Project**

Dear Ms. Wong

The Board of Directors of the Eco-Rapid Transit Joint Powers Authority is pleased to take this opportunity to provide comments on the rescoping of the environmental review process for the West Santa Ana Branch/Eco-Rapid Transit (WSAB) Light Rail Corridor Project. There are general comments which apply to all or most of the alignment and comments specific to certain jurisdictions. These jurisdictional comments are not meant to be all-inclusive of impacts or city interests. The intention is to capture comments made by JPA elected representatives.

The mission of Eco-Rapid Transit is the: "Development of a transit system that moves as rapidly as possible, uses grade separation as appropriate, and is environmentally friendly and energy efficient. The system is designed to enhance and increase transportation options for riders of this region utilizing safe, advanced transit technology to expand economic growth and maximize ridership throughout Southern California." This statement addresses the major environmental issues Eco-Rapid Transit JPA wishes to be considered as part of the environmental studies and transit design as outlined below.

Scoping Elements/Subjects

- Design of the station areas should maximize neighborhood connectivity. This position was specifically addressed when Eco-Rapid Transit adopted specific design standards as part of the TOD Design Guidelines, we believe that these standards should be considered as Metro defines the design of the station areas and what they are reconstructing as they develop construction plan for the station areas.
- To encourage multi-modal transportation options to the stations and lessen traffic impacts around the station- the stations need to be designed to accommodate the various modes and the surrounding streets designed to encourage safe active transportation and bus routes.
- Elevated tracks, that move from at grade to elevated slows the speed and efficiency of the transit cars and utilize more energy for elevating and descending the different elevations.

- Elevated tracks, that are on mounds and not fully elevated, create a visual block between neighborhoods and divide neighborhoods.
- The WSAB is a line, separate from the other existing lines. As such, it does not need to be designed following the same standards. It can take advantage of new technologies in transit design, operations including energy efficient designs that do not require the visual blight of a catenary system.
- The WSAB, as current plans show, would eliminate some bikeways/walkways along the route and others planned adjacent. The environmental studies should address the ability to build multimodal and transit focused facilities adjacent to at grade and underneath elevated tracks.
- To utilize the most advanced transit safety and transit systems, as well as attract investment in the TOD advanced data lines need to be installed. The most efficient means would be to incorporate in the transit structures.
- From the studies undertaken thus far, it is evident that there will be many infrastructure upgrades needed in the station areas. Define "betterments"; How are "betterments" negotiated? Cities need to focus on utility or other city property/utilities that may require relocation or may be disrupted by project construction. Will there be funding for advanced utility studies to help cities determine what is in-ground and what may need to be removed, moved and upgraded or replaced? OR negotiated through an MCA. Also, cities need to define construction mitigation for the project – public safety (police, fire, ambulance) access to construction zones, business interruption and interruption avoidance.
- Street improvements/accommodations, temporary and permanent closures. Work arounds, construction pedestrian safety – permanent and temporary First/Last mile access to station areas. Analyze impacts to street geometry, permanent and temporary parking access. Analyze impacts of temporary and permanent street closures associated with the construction of the alignment as well as the station areas.
- MTA has never done an environmental document where the alignment cuts through so many small and self-contained jurisdictions. Document needs to address "cross-jurisdictional development" and assess cumulative impact for the cities. Specific plans and city developments may have different impacts on traffic, streets, access, utilities, parking and alignment. How will this growth impact be captured?
- Ensure that the environmental document considers the potential for creativity, cost savings, operational improvements for the proposed public-private partnership process. This includes also maintaining an ability to use the latest information systems, wireless light rail technology, train control systems and newest light rail systems. This also includes design considerations such as the ability to have low floor or high floor vehicles.

General Comments (in no particular order or ranking of importance) –

- **Gentrification** – Southeast LA County home values will be impacted by the introduction of high quality transit access to the regional rail network. Strategies to allow current owners to “capture” rail induced value, increase housing opportunities, provide affordable housing need to be discussed, Compared to many areas of the County, southeast LA County home prices are lower for similar housing stock in similar neighborhoods. The announcement of rail service within the corridor will most likely escalate housing prices and price people out of the area. Furthermore the project area has a high concentration of renters than the state (50% vs. 44.7% statewide) with some communities along the alignments having as many as 83% of all households renting their homes. To add to this, the area has higher than average persons per household. Therefore there is concern about the pricing and availability of rental housing particularly single-family renters and the higher than the county average occupancy in Gateway Cities that suggests house sharing and overcrowding. Increased housing prices/rents, scarcity of affordable housing and overcrowding are environmental impacts that should be addressed as a part of the environmental inquiry.
- **At-grade versus grade separated alignment/Crossings** - Given the projected ridership will at-grade crossings allow for 1) the train to maximize headways to accommodate future ridership including the potential for an Orange County connection?; 2) Will a “roll-a-coaster” profile create long term wear on trainsets and wheels thereby reducing operational reliability?
- The majority of the proposed alignment along the Pacific Electric/WSAB Right of Way (ROW) traverses major arterials and other streets as diagonal crossings. Almost every major arterial within the ROW is affected. If these grade crossings remain at-grade they will result in crossing gates being down for extended periods during the peak hours; the gates will be lowered longer than other LRT corridors as the intersections are longer and the train will take longer to clear. Safety is a primary concern with these elongated crossings. The opportunity for motorists to challenge to gates will become an issue. There is a notable downside to the at-grade design option with the projected ridership numbers of 65,000 to 70,000 daily riders for the WSAB line. During peak periods, 5 to 6 minute headways in each direction could easily stop traffic for at least 20 and perhaps as much as 28 minutes during each hour, with the crossing gates coming down every 3 to 6 minutes. During the peak period, this adds travel time to a substantial amount of routine vehicle and pedestrian traffic, including those commuting to work and parents dropping off/picking up children from the both public and private schools in close proximity to and around the alignment. These frequent and prolonged stops will add to local air pollution

“hotspots”, traffic delays and travel frustration and safety hazards decreasing the quality of life of residents and business owners by a project that by its very nature is meant to decrease these same issues for the cities the WSAB traverses and is supposed to serve.

- **Traffic Counts** – When were traffic counts taken? Time of day, during school hours, before or after school. Were field observations made to ascertain access by school children using the ROW or streets that cross the ROW for school access? Have qualitative interviews/conversations with school principals or school service police been conducted? The ROW has many truck routes – have truck volumes been analyzed to determine grade crossing profile. Has the consultant checked with the I-710 and 91/6-5/405 teams to mine truck data and crossing volumes, other potential conflict with at-grade crossings? Has the analysis included additional dwell time for trucks and air quality degradation potential for at-grade crossings? Impact of potential truck/train safety at grade crossings? Any notation of future warehouse construction? Existing warehouses? Garfield Blvd and 1 million sq. ft. warehouse as an example. Is projected growth from city plans, specific plans and TOC overlays been taken into account for traffic projections.
- **Public Safety** - Train stations and the ROW alignment will be located near the downtown areas for almost all of the cities along the alignment, additionally there are both private and public school locations immediately adjacent to or just outside of the ROW; accordingly, construction and operations of the trains along the tracks and station will impact the neighboring downtown areas, and nearby schools. Please evaluate potential impacts to downtown areas and nearby schools during construction and operation of the train facilities and improvements. The alignment proposal also requires interface with freight providers and freight lines and freight licenses. There are potential conflicts or the potential for conflicts with rail freight movement in the cities of Vernon, Huntington Park, Bell, Maywood, Cudahy, South Gate and Paramount. The presence of rail freight and associative issues have the potential to impact the alignment, alignment profile, and eventually the operation of the line. This will be further complicated by pedestrian, bicycles and other non-motorized travelers trying to access the station or crossing the alignment.
- **Vehicular Traffic, Cycling, and Pedestrian Impacts** - Evaluate (1) vehicular traffic, cycling and pedestrian delays, (2) vehicle and bicycle accidents, (3) the timing and construction and closures as a result of other regional transportation projects such as improvement projects to the I-5, I-710 Corridor Project, SR-91/I-605/I-405 freeway improvement projects as well as the complete streets efforts by the Gateway Cities COG, and (4) emergency responder response times associated with construction and operations of all train facilities and improvements.

Many of these streets are major goods movement corridors. How does the traffic impacts affect truck deliveries and timing within these major industrial areas.

- **Oil lines** – Are there significant oil and gas line facilities that may impact construction (ie. City of Vernon) or create impacts to the line or the community?
- **Utilities** – What is the impact on major utilities or crossing major utility easements (SoCal Edison and LADWP) are there conflicts or other issues that may require an advanced utility study or at least a conference with major utility providers? Has consideration been given for advanced utility studies that may impact the alignment? Has the team mined the I-710 advanced utility studies for possible conflicts or a better understanding of existing and future conditions? The city of Vernon has its own power plant. Has this been factors into the alignment?
- **Utilization of Railroad ROW** – What are the assumption associated with crossing and or utilization of railroad ROW (UP/BNSF). If RR ROW use is anticipated what happens if it is not available? Steps/timing for ROW process and project design; potential for conflicts. Most importantly is there a Plan B?
- **Parking** – Given the nature of the ROW and the proximity to residential uses, how will parking intrusion/spillover into neighborhoods be prevented? Has there been a parking study of the station areas including inventory, occupancy, turnover and parking rates been completed? What is the size of the parking study area? Will it cover the entire TOD station area? What is the potential for shared parking with City developments? How will this be accomplished? Are there plans to develop a comprehensive on-street/off-street parking analysis in the station areas? Eco-Rapid Transit has developed the concept of demand based parking requirements in the station area and parking management planning based on demand, location, time, price and supply strategies. How will this be integrated into the environmental analysis?
- **Transit/System Connectivity** – What is the plan to improve transit connectivity to the West Santa Ana Branch and its station areas? Does this include connectivity along Florence from the Blue Line Station to Florence/Salt Lake to Downtown Bell Gardens? What is the plan to enhance connectivity from the West Santa Ana Branch Stations to Atlantic? Atlantic is a major street for transit buses. This should include Atlantic as it passes through Bell, Maywood, Cudahy and South Gate.
- **Ridership Impacts from the Northern Alternatives** – What are the impacts on ridership from the downtown alternatives that require use of a block long tunnel to transfer to other lines for linked trips?
- **HAZOP Study** – We suggest that the consultant team consider the addition of this study. A Hazard Operability Study is a detailed oriented analysis of a

process design or project that is designed to determine all possible hazards or risks that can occur. This hazard analysis is used in order to prevent any harm to people, damage to equipment, or any damage to the environment. The basis of a HAZOP study is to use these hazardous findings in order to alter the process design or project in a way that will prevent any of the hazards that can occur. With direct relation with railway transportation, hazard analysis must also be considered. In many cases, railway transportation usually carry passengers, chemical/raw materials that are hazardous to the environment, and even the structure of the railway itself can be an issue if there are flaws in the design. These examples alone can leave civilians, the environment, and the transportation system at risk to hazards. Thus, leading to the importance of conducting a HAZOP study on any process design or any proposed projects in order to prevent any disastrous events.

- **Parks** – the entire project area needs to have more access to park and recreational facilities. Linkages to existing and potential recreation areas are critical and needs to be addressed. This includes looking specifically at connectivity to the Los Angeles River, preserving and creating bicycle and pedestrian facilities and creating linear parks if possible along the alignment. It also includes an opportunity to create a Cap Park that needs to be explored that would create an asset at the I-105/Green Line Station.

Comments specific to WSAB alignment cities –

- **Paramount** – There needs to be special consideration for the Rosecrans/Paramount Blvd. and Downey Ave. crossing, and alignment profile. Paramount High is one of the most populous high schools in the county, there are thousands of children accessing the school from all around the station area and alignment. The potential for pedestrian/train conflicts requires consideration for grade separation. The team should investigate experience with other LRT jurisdictions regarding neighborhood parking intrusion, parking mitigation plans for station area neighborhoods including the parking restrictions that were put in place for the South Pasadena\Mission Station. Station Area Parking is proposed to be located on an existing vital Paramount business. A more comprehensive look at parking that considers other adjacent sites that would be more appropriate for parking/joint development.
- **Huntington Park** – The document needs to capture the school traffic issue and routes to school from the alignment as well as access to station areas. There is concern about Pacific Avenue businesses during and after construction as well as the Florence grade crossing. There are also concerns

related to affordable housing and the 3% local match requirement for underserved communities with limited resources.

- **Bellflower** – At-grade diagonal crossings, safety and traffic issues – does the environmental document accurately reflect future growth? Multi-jurisdictional station area development – is this captured in the document? Please work closely with the City of Bellflower due to the unique characteristics of the street network, diagonal crossings and need for grade separation.
- **South Gate** – The City is concerned about grade crossings at Firestone and Atlantic. The analysis needs to include more than automobile traffic and consider the potential significant impact on truck and goods movement in the project area. Please also consider the possibility of an additional station that may be proposed in South Gate near the Los Angeles River. There is also a potential issue involving the impact of an at-grade crossing at Imperial. This can impact not only South Gate but also Lynwood and Downey.
- **Downey** – the Gardendale Station is a unique opportunity due to its development potential. This should include an updated analysis of future opportunities as well as connectivity to Rancho Los Amigos.
- **Vernon** – The City is concerned about the Metro Blue Line Interface and potential impacts to traffic during and after construction. The City is also concerned about long-term potential conflicts between rail and truck traffic?
- **Glendale/Hollywood Burbank Airport** – Glendale is not part of the current project but will be part of Phase 2 of the WSAB/Eco-Project, the eventual extension beyond LAUS. As this is a known possibility, access cannot preclude this possibility of the Phase 2 Extension. Analysis should focus on continued access to either an LRT or street-car if it is the logical continuation or combination with regional rail to access Hollywood-Burbank Airport and its new Airport Terminal (expected in 2025). This becomes even more important as you consider not only normal traffic and transportation issues but also factor in travel related to the 2026 World Cup and 2028 Olympics.

If there are any questions concerning this letter or you would like to discuss any of these comments, please contact Michael R. Kodama, Executive Director, Eco-Rapid Transit

Sincerely,

Zareh Sinanyan
Chair, Eco-Rapid Transit

Environmental Planning and Mitigation Plan Proposal

Draft 6/13/18

PROPOSAL TO PREPARE WSAB CORRIDOR CITIES FOR CONSTRUCTION MITIGATION and SHARING RIGHT OF WAY WITH THE METRO West Santa Ana Branch (WSAB) PROJECT

OBJECTIVE:

A lesson learned from previous light rail projects is how inadequate construction mitigation planning during the EIR process has affected citizens and merchants during project implementation and how given Metro's process to address mitigation failures requires lengthy negotiations; negative impacts to the local economy are compounded. Further, the required use of adjacent motor vehicle rights-of-way for a rail project is generally not fully considered; thus necessitating additional last-minute and almost certainly a costly acquisition of adjacent parcels to implement the project and creating costly traffic diversion, safe pedestrian pathways, and reconstruction of local infrastructure. Eco-Rapid Transit believes that if the WSAB Corridor Cities were provided resources to both work with local merchants and create business attraction and retention programs as well as develop and adopt standards and procedures for construction of transit across the cities' Rights of Way as well as addressing infrastructure and mitigation ahead of construction, both mitigation, project implementation would be enhanced and project implementation faster and smoother.

The purpose of this request is twofold: develop and adopt standard rules procedures for three components: right-of-way use, acquisition and infrastructure/traffic construction mitigation as well as an on-going community interface with the construction team and establish a business attraction and retention program that is responsive to the diversity of neighborhoods, including the needs of the commercial, industrial and residential communities.

TASKS - INFRASTRUCTURE:

1. Document past practices and lessons learned from previous light rail projects nationally and especially Metro's experience during implementation of its extensive rail system;
2. Document existing policies of the corridor cities. Policies should include standards for street and sidewalk widths, traffic signal requirements and parking implementation and design. Existing specific plans for adjacent development and connections for pedestrian and bicycle links should be documented;
3. Solicit input from affected Corridor communities within a specific radius of the proposed alignment. A two-way communication of the existing policies and best practices should with additional input from the affected citizens bring forward ideas for additional policies and procedures;

Environmental Planning and Mitigation Plan Proposal

Draft 6/13/18

4. Compile the findings in a concise report. The report should be reviewed and finalized with the help of WSAB Corridor City Managers; and
5. Work with Corridor Cities and Metro to adopt mutually acceptable policies and procedures.

TASKS Business Attraction and Retention

1. Document past practices and lessons learned from previous light rail projects nationally and locally.
2. Working with cities, select local team/not of profit/business association to lead planning and implementation efforts in the station areas and along the corridors.
3. The local teams will meet with businesses; organizations, residents and stakeholders along the corridor to identify opportunities for business attraction/retention.
4. The local teams will develop a draft business attraction and retention as well as a residential protection plan and develop consensus with the targeted interests.
5. Compile Business Attraction/Retention/Neighborhood preservation implementation plans into a Construction Mitigation Plan and negotiate with Metro implementation.
6. Once approved, local organizations and coordinator will work with the local community organizations and Metro to Implement

Environmental Planning and Mitigation Plan Proposal

Draft 6/13/18

ESTIMATE OF COSTS

The following tabulation is a rough estimate of the project cost.

		HOURS	HOURS	
	TASK	CONSULTANT	ECO-STAFF	MISC COST
1	Best Practices	120	20	
2	Review Existing Policies/Standard	80	30	
3	Community Input	90	60	
4	Draft Light Rail Integration Plan	1120	20	\$125,000
5	Prepare Report	40	20	\$25,000
6	Work with Cities to Adopt Light Rail Integration Plan	120	40	
7	Work with local organizations to develop Business retention and attraction program as well as neighborhood protection plan	40	120	\$50,000 for local organization per station area
8	Negotiate with Metro right of way usage	5	20	
9	Work with Metro mitigation implementation plan	45	90	