

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:

AGENDA REPORT

TO: Members of Eco-Rapid Transit
FROM: Michael Kodama, Executive Director
DATE: September 19, 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

Eco-Rapid Transit staff was authorized to send a comment letter to Metro as part of the rescoping of the Eco-Rapid/West Santa Ana Branch environmental review process. Attached is the letter sent to Metro.

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 Transit 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 was open until August 24th.

RECOMMENDATION

It is recommended that the Board:

1. Discuss information presented and offer action items; and/or
2. Receive and file the item

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August 20, 2018

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 Eco-Rapid Transit elected representatives or their staff.

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 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 design standards as part of the TOD Design Guidelines adopted September, 2014. 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 plans for the station areas.
- To encourage multi-modal transportation options to the stations and 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. Utilization of areas

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under elevated track for development, first/last mile connections can help tie neighborhoods together.

- The WSAB is a line, independent from the other existing light rail lines. As such, it does not need to be designed following the same standards. It should take advantage of new technologies in transit design, operations including energy efficient designs that may 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 in the planning process. The environmental studies should address the ability to build multimodal and transit focused facilities adjacent to, at grade and underneath elevated tracks. Additionally, there needs to be consideration for preserving or recreating existing community pathways and connections that currently utilize the ROW to the greatest extent possible.
- To utilize the most advanced transit safety and transit systems, as well as attract investment in the TOD advanced fiber data lines need to be installed. The most efficient means to build may be to incorporate the data lines 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? MTA and the 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 will these necessary measures be negotiated through a Master Cooperation Agreement? 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. The DEIR 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 and operational improvements for the proposed public-private partnership process. This includes maintaining an ability to use the latest information systems, wireless light rail technology, train control

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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 Los Angeles 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 Los Angeles 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 compared to 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 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.

Additionally, care needs to occur to analyze proven opportunities, strategies and tactics that insure upward mobility for the corridor communities.

To offset the potential rise in housing costs, construction of the transit system and investment in TOD needs to generate living wage jobs that benefit the residents and local businesses. This could build equity for the neighborhood. How this may work is a social justice issue that needs to be considered.

- **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 extension?; 2) Will a “roll-a-coaster” profile create long term wear on trainsets and wheels thereby reducing operational reliability and increase maintenance cost?
- **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.

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Safety is a primary concern with these elongated crossings. The opportunity for motorists to challenge the gates will become an issue. There is a notable downside to the at-grade design option with the projected ridership numbers of 75,000 to 80,000 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 Avenue and 1 million sq. ft. warehouse as an example of special goods movement to analyze. Has projected growth from city plans, specific plans and TOC overlays been taken into account to analyze as traffic is studied? Initial reports that we have seen, do not accurately anticipate growth.
- **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

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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 factored into the alignment as an option for power?
- **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? What are the next steps/timing for ROW process and project design? Or 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

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supply strategies. How will this be integrated into the environmental analysis and the MTA Transit supportive parking program?

- **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 Avenue from the Blue Line Station to Florence Avenue/Salt Lake Avenue to Downtown Bell Gardens? What is the plan to enhance connectivity from the West Santa Ana Branch Stations to Atlantic Boulevard? Atlantic Boulevard 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? Why build two stations instead of one station serving two lines? The determination of a northern terminus for the WSAB needs to consider future access to California High Speed Rail and direct access to Metrolink in addition the accessing other Metro Rail Lines.
- **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.
- **Construction Mitigation** – Ensure that impacts and proposed mitigations are examined both on a multijurisdictional and city by city basis and in close consultation with the cities. For example, the I-5 JPA has worked closely with MTA to mitigate construction impacts along the I-5 freeway in Gateway Cities.



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Comments specific to WSAB alignment cities –

- **Paramount** – There needs to be special consideration for the Rosecrans Boulevard/Paramount Boulevard and Downey Avenue 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. Metro 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 located on an existing vital Paramount business, there are other adjacent sites that would be more appropriate for parking/joint development. The team should look to utilize a freeway cap to create linear park space and provide access to the Metro Green Line/WSAB 1-105 station from Garfield Avenue that does not intrude into the adjacent single family neighborhoods.
- **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 Boulevard businesses during and after construction as well as the Florence Avenue grade crossing.
- **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** – There is concern about grade crossings at Firestone and Atlantic, with a preference for grade separation. 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. In consultation with the County of Los Angeles and the City of Downey, this can include an updated analysis of future development opportunities as well as integration with Rancho Los Amigos.

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- **Vernon** – There is concern about the Metro Blue Line Interface and potential impacts to traffic during and after construction. There is concern about long-term potential conflicts between rail and truck traffic.
- **Bell** – There needs to be a study to examine the possibility of moving the Salt Lake/Florence station northerly to minimize impacts to this important intersection and pedestrian impacts.
- **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 Los Angeles Union Station. 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. This becomes even more important as you consider not only normal traffic and transportation issues but also factor in a new airport terminal planned for 2025, as well as 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 Karen Z. Heit, Deputy Executive Director, Eco-Rapid Transit.

Sincerely,



Michael R. Kodama
Executive Director, Eco-Rapid Transit