

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 Cerritos

City of Cudahy

City of Downey

City of Glendale

City of Huntington Park

City of Maywood

City of Paramount

City of South Gate

Burbank-Glendale-Pasadena
Airport Authority

Chair

Ali Sajjad Taj
Council Member
City of Artesia

Vice-Chair

Sean Ashton
Councilmember
City of Downey

Secretary

Vrej Agajanian
Councilmember
City of Glendale

Treasurer

Jose R. Gonzalez
Mayor
City of Cudahy

Internal Auditor

Alejandra Cortez
Councilmember
City of Bell Gardens

Executive Director
Michael R. Kodama

General Counsel
Matthew T. Summers

Ex-Officio

William Rawlings
City Manager Representative

AGENDA REPORT

TO: Members of Eco-Rapid Transit Board of Directors

FROM: Michael Kodama, Executive Director

DATE: October 13, 2021

**SUBJECT: UPDATE AND/OR ACTION REGARDING WEST SANTA ANA
BRANCH TRANSIT CORRIDOR**

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

Staff will provide an update and seeks input from the Board of Directors regarding the West Santa Ana Branch.

BACKGROUND

On September 21st, 2021, the Eco-Rapid Transit Board of Directors held a special meeting and approved staff moving forward with a Draft WSAB EIS/EIR Comment Letter supporting Alternative 1 (Union Station), Design Option 2 (Little Tokyo Station). Staff also provided assistance and worked with members and stakeholders who also submitted comment letters to Metro.

The Eco-Rapid Transit letter was finalized and submitted to Metro on September 25, 2021 (see attached).

Much of our Eco-Rapid Transit effort was funded through Metro Third Party Administration funds. We also used a special assessment of our members to pay for an environmental consultant. Our members along the West Santa Ana Branch can also use these Metro Third Party Administration funds which are administered by Gateway Cities Council of Governments.

Eco-Rapid Transit staff currently anticipates that the Metro Board of Directors will select a Locally Preferred Alternative (LPA) at their board meeting on January 27th, 2022.

RECOMMENDATION

It is recommended that the Board:

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



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 Cerritos
City of Cudahy
City of Downey
City of Glendale
City of Huntington Park
City of Maywood
City of Paramount
City of South Gate
Burbank-Glendale-Pasadena
Airport Authority

Chair

Ali Sajjad Taj
Council Member
City of Artesia

Vice-Chair

Sean Ashton
Councilmember
City of Downey

Secretary

Vrej Agajanian
Councilmember
City of Glendale

Treasurer

Jose R. Gonzalez
Mayor
City of Cudahy

Internal Auditor

Alejandra Cortez
Councilmember
City of Bell Gardens

Executive Director

Michael R. Kodama

General Counsel

Matthew T. Summers

Ex-Officio

William Rawlings
City Manager Representative

September 25, 2021

Ms. Meghna Khanna
Project Manager, Metro
One Gateway Plaza, M/S 88-22-7
Los Angeles CA 90012

Re: Comments West Santa Ana Branch Transit Corridor Draft Environmental Impact Statement/Environmental Impact Report

Ms. Khanna,

Section 1 – Support Alternative 1, Design Option 2

Eco-Rapid Transit has reviewed the West Santa Ana Branch (WSAB) Transit Corridor Draft Environmental Impact Report/Statement and **unanimously supports the selection of Alternative 1** (Los Angeles Union Station to Pioneer Station) and **Design Option 2** (Addition of Little Tokyo Station). The Eco-Rapid Transit Board of Directors strongly believes that working together with the Los Angeles County Metropolitan Transportation Authority (Metro) and our elected representatives, we can obtain funding to build this line in an equitable, sustainable and responsible manner. Our communities were strong supporters of Measures R and M transportation sales tax measures that are being used by Metro to fund the local portion of the WSAB light rail project.

As much as we support the project, our cities - especially after the COVID-19 impact on local brick and mortar retail businesses and the subsequent loss of sales tax revenues - do not have the financial means to provide the 3% local match within the required 5-year period. We ask that Metro work with the cities to reduce the amount of local contribution and on identifying non city general fund revenue that can be utilized to satisfy this requirement. Additionally, Eco-Rapid Transit requests that the existing 5-year time frame be extended through the life of the project and that the cities located in the southeast Los Angeles only be required to pay its fair share of the 3% local contribution for the operating segment that directly benefits the Gateway Cities region from Artesia to Slauson.

Eco-Rapid Transit recognizes the importance of balancing the *need* to create a high-quality sustainable light rail transit line that can provide 100 years of service with the *cost*. We appreciate the challenge of obtaining sufficient funding to build this project. For our communities, this is also a question of fairness and equity. As a region comprised of Environmental Justice communities that are adversely impacted by environmental and socioeconomic factors which affect the health, environment and quality of life of the local resident on a regular basis, we expect to be treated fairly and given the same consideration as past Metro projects serving other more affluent areas of Los Angeles County. As a **Justice40** project, under the President Biden administration, we recognize the importance of moving forward quickly together to be able to secure the federal funding necessary to complete this environmentally friendly, sustainable and equitable transit project. To help ensure eligibility for this funding the Locally Preferred Alternative should be Alternative 1, Design Option 2 so that the entire line, all possible phases, has a CERTIFIED environmental analysis completed prior to availability of funds.

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 Cerritos
- City of Cudahy
- City of Downey
- City of Glendale
- City of Huntington Park
- City of Maywood
- City of Paramount
- City of South Gate
- Burbank-Glendale-Pasadena Airport Authority

Chair

Ali Sajjad Taj
Council Member
City of Artesia

Vice-Chair

Sean Ashton
Councilmember
City of Downey

Secretary

Vrej Agajanian
Councilmember
City of Glendale

Treasurer

Jose R. Gonzalez
Mayor
City of Cudahy

Internal Auditor

Alejandra Cortez
Councilmember
City of Bell Gardens

Executive Director

Michael R. Kodama

General Counsel

Matthew T. Summers

Ex-Officio

William Rawlings
City Manager Representative

Section 2 – Eco-Rapid Transit

Eco-Rapid Transit, also known as the Orangeline Development Authority (OLDA), has been the leading advocate for the WSAB project. Eco-Rapid Transit consists of 12 members including the cities of Artesia, Bell, Bell Gardens, Cerritos, Cudahy, Downey, Glendale, Huntington Park, Maywood, Paramount, South Gate and the Burbank Glendale Pasadena Airport Authority. Since 2002, the members have consistently supported a one seat ride to Union Station (Alternative 1) because of the regional connectivity of a one-seat trip, resulting in a superior vehicle miles traveled (VMT) reduction and resulting in high transit ridership under this Draft EIR/EIS alternatives analysis. Eco-Rapid Transit supports Design Option 2 because it connects our residents to important jobs and activity centers providing direct access to key downtown destinations and beyond to East Los Angeles and eventually Whittier, simultaneously connecting residents from those areas to the job rich industries in Gateway Cities.

Through the leadership of the Eco-Rapid Transit Board of Directors, the WSAB was funded as part of Measure R and Measure M. In the 1980’s former Los Angeles County Supervisor Don Knabe, (at the time a Cerritos City Councilmember) proposed a rail line along the West Santa Ana Branch. Since then, Eco-Rapid Transit was formed and then collaborated with Congressman Alan Lowenthal (then a California State Senator to secure initial funding in Measure R, actively participated in and selected the initial stations in the SCAG Alternative Analysis, contributed to the Metro Technical Refinement Analysis and partnered with Gateway Cities COG to secure Metro funding as part of the 2016 Measure M local transportation sales tax. It must be remembered that together with Gateway Cities COG, we opposed Measure M until Eric Garcetti, Metro Chair and then Metro Board of Directors agreed to accelerate the Measure M funding allocation from FY 2041 to 2028 as part of a public private partnership. Eco-Rapid Transit pledges to continue to partner with Metro to seek and secure financial options to help Metro keep their promise to our communities. This promise includes partnering on federal and state funding requests to build this project in a timely manner using Public Private Partnerships, bonding, financing, and other funding options to complete the project from Artesia to Union Station by 2028.

Section 3 – Eco-Rapid Transit Recommendations

Eco-Rapid Transit, believes the federal and state environmental laws were created to help and protect the health of our communities and concurs with Metro about the purpose and need for the project. Eco-Rapid Transit supports the goals identified in the Draft EIR/EIS as well as the study area identified in the Executive Summary and in Chapter One of the Draft EIR/EIS. However, Eco-Rapid Transit, having worked with SCAG, Metro and the communities through a number of previous studies, does not want to limit the construction of the transit corridor to funds on hand and has the following specific recommendations and comments on the EIR/EIS that support the development of a transit line that is sustainable-environmentally and economically, equitable and creates healthy, vibrant and prosperous communities. We believe addressing our concerns will promote the following values, consistent with NEPA and

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 Cerritos
- City of Cudahy
- City of Downey
- City of Glendale
- City of Huntington Park
- City of Maywood
- City of Paramount
- City of South Gate
- Burbank-Glendale-Pasadena Airport Authority

Chair

Ali Sajjad Taj
Council Member
City of Artesia

Vice-Chair

Sean Ashton
Councilmember
City of Downey

Secretary

Vrej Agajanian
Councilmember
City of Glendale

Treasurer

Jose R. Gonzalez
Mayor
City of Cudahy

Internal Auditor

Alejandra Cortez
Councilmember
City of Bell Gardens

Executive Director
Michael R. Kodama

General Counsel
Matthew T. Summers

Ex-Officio
William Rawlings
City Manager Representative

CEQA laws, as well as the goals of the project. Therefore, Metro should select the project that will:

- Protect the communities and their sensitive land uses from Potential Significant Environmental Impacts.
- Maximize Economic and Community Development opportunities and not preclude them by construction design.
- Maximize opportunities for current local businesses and residents to thrive and not be displaced.
- Maximize Local, State, and Federal funding opportunities with environmental certification of a phased project, acknowledging the possible need for supplemental environmental documents for detailed aspects of each phase.
- Recognize the real impacts and create, implement and monitor mitigation measures that effectively reduce potential adverse impacts to a level of insignificance during construction and following the project completion.
- Build a quality, state of the art, regional transportation line
- Minimize construction impacts including, but not limited to, traffic impacts associated with the diversion of tractor trailers and passenger vehicles onto secondary arterial and residential streets as well as additional construction impacts discussed below.
- Plan for Safety and Security of system during project construction, anticipated future development surrounding the route, and operations through the deployment of video technology at station locations used to supplement local law enforcement.
- Minimize Noise, Vibrations and the generation of particulate matter from constriction and brake dust for all sensitive land uses, receptors and businesses with sensitive receptivity.
- Analyze housing, community development and recreational opportunities at staging and parking sites for the project.
- Promote and provide connections to other modes of transportation along the route including bike and pedestrian trails as identified in local bike plans and existing walking trails and providing adequate parking for residents and workers connecting to transit.
- Analyze potential climate adaptation strategies that promote compatibility of the project with climate change over time.
- Provide adequate parking to support station location on site and/by way of satellite parking structures supporting both transit and local businesses.

Section 4 – Additional Eco-Rapid Transit Specific Recommendations:

Eco-Rapid Transit has specific comments that it suggests need to be addressed to meet the community and system needs as required by environmental law:

1. Bell Gardens and Maywood should be included in all analysis as identified in the WSAB Transit Corridor Study Area map and the analysis in pages 1-4, 1-6 and 1-7. The EIR/EIS needs to include connectivity from the WSAB stations to Bell Gardens and Maywood. Both communities need to be included in first

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 Cerritos
- City of Cudahy
- City of Downey
- City of Glendale
- City of Huntington Park
- City of Maywood
- City of Paramount
- City of South Gate
- Burbank-Glendale-Pasadena Airport Authority

Chair

Ali Sajjad Taj
Council Member
City of Artesia

Vice-Chair

Sean Ashton
Councilmember
City of Downey

Secretary

Vrej Agajanian
Councilmember
City of Glendale

Treasurer

Jose R. Gonzalez
Mayor
City of Cudahy

Internal Auditor

Alejandra Cortez
Councilmember
City of Bell Gardens

Executive Director

Michael R. Kodama

General Counsel

Matthew T. Summers

Ex-Officio

William Rawlings
City Manager Representative

mile/last mile analysis as described in the FTA/Metro/Eco-Rapid Transit/South Gate TOD SIP.

2. Impacts to the commercial corridors and businesses require a more robust mitigation program. The corridor is home to three unique historic main streets: Pacific, Bellflower and Pioneer Boulevards. Each will have significant impacts during construction that will need to be mitigated through a business interruption fund. Additional mitigation measures should be developed and implemented to effectively render potential impacts to a level of insignificance at regional shopping centers including, but not limited to, the Los Cerritos Center, Azalea and the Cerritos Auto Square during construction. It should be applied in station areas and along the entire corridor. The mitigations outlined in COM-1, Pg. 4-632 and Appendix CC are insufficient to support these business districts and help them thrive long enough to welcome new business once the line is opened. For example, allocate funding and technical expertise for a community-based marketing, branding and outreach initiative similar to Go Little Tokyo, that is specific to unique main streets such as Pacific Boulevard in Huntington Park, to support local businesses during the construction period. Create programs with the local businesses to support them including similar to the Crenshaw/LAX transit Corridor Community Benefits Program.
3. Similarly, as stated in the Draft EIR/S, large portions of the project are in heavily industrial areas. Manufacturing and distributing goods mean there is significant goods movement throughout the street system by way of large tractor trailers. The impacts to the movement of goods will result in the diversion of tractor trailers onto adjacent arterial and residential streets that are not designated for such traffic there by resulting the adverse traffic impacts that are not addressed. Additionally, changes to the streets, freeway access, turns all affect truck traffic—their ability to move through the area and the time it takes for them to travel through the impacted Study Area must be analyzed in greater detail. There needs to be discussions with local municipalities about designating alternative truck routes so as to minimize impacts to the respective communities and local businesses to ensure their needs are met during construction and after operations commence.
4. Additionally, in Appendix CC, 5-12 it states that one of the consequences of construction will be the relocation of businesses to other parts of the county. Businesses thrive in areas where resources and labor are available and where their customer base exists. Just because there may be buildings that can house a business elsewhere, does not mean that the subject business should be relocated outside of the jurisdiction nor that they can survive in that new location. A specific business relocation plan needs to be developed that requires businesses to be relocated within the original jurisdiction, to the extent that is feasible. If such an option is determined infeasible, then a market analysis should be conducted to determine the most suitable

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 Cerritos
- City of Cudahy
- City of Downey
- City of Glendale
- City of Huntington Park
- City of Maywood
- City of Paramount
- City of South Gate
- Burbank-Glendale-Pasadena Airport Authority

Chair

Ali Sajjad Taj
Council Member
City of Artesia

Vice-Chair

Sean Ashton
Councilmember
City of Downey

Secretary

Vrej Agajanian
Councilmember
City of Glendale

Treasurer

Jose R. Gonzalez
Mayor
City of Cudahy

Internal Auditor

Alejandra Cortez
Councilmember
City of Bell Gardens

Executive Director

Michael R. Kodama

General Counsel

Matthew T. Summers

Ex-Officio

William Rawlings
City Manager Representative

relocation property. Loss of businesses means the loss of jobs and potential sales tax revenue for the local municipality. This is an especially difficult impact for this EJ area. Part of the mitigation plan should include local worker hiring and training as well as a plan to utilize local minority business enterprises.

5. Metro should conduct an objective feasibility assessment, as requested during the Initial Study, comparing above grade and below grade options at 183rd Street and Gridley Road located in the cities of Cerritos and Artesia. The assessment should examine engineering, design and cost factors as part of this analysis. This should be an open process with concurrence and participation from Gateway Cities COG, Eco-Rapid Transit and the cities of Artesia and Cerritos.
6. Eco-Rapid Transit supports options, previously discussed publicly, for the potential development of two future stations: (1) at the Rio Hondo Confluence, and (2) in Cerritos between Studebaker and Gridley. While we understand the difficulty of including these stations in the current analysis, we do believe that the current design and analysis must not preclude the potential for these stations to exist in the future. Accordingly, Eco-Rapid Transit request that an environmental assessment be prepared as a supplement to the WSAB EIR/S in order for the Rio Hondo Confluence and Cerritos stations to exist at the discretion of the respective local municipalities.
7. Addressing issues of handicapped accessibility, visual blight, neighborhood barriers and sound, Metro should look at new technologies that improve the sustainability and lessen the environmental impact of the transit project, including assessing a low floor vehicle option, wireless charging/electric generation and high resilient rail fasteners. With the exception of Baltimore and LA Metro, all of the other light rail transit systems in the United States and Canada operate low floor vehicles. Since the WSAB line is not proposed to be interconnected with any other Metro light rail lines, this line could use newer technologies without interfering with the existing system. Additionally, throughout the world transit is switching to more energy efficient and sustainable models including electricity generating braking with station charging, which lowers the cost of operations, reduces the number of electric substations required along the route and may provide sufficient electricity to power the station areas themselves. This also would eliminate the need for the catenary system, reducing visual blight and costs.
8. Declaring that the entire line is an Environmental Justice (EJ) Corridor, so any negative impact is not of significance, since the entire corridor is treated the same, is an oversimplification of facts and a misreading of FTA's EJ rules. The development of this corridor should be provided the same amenities as other

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 Cerritos
- City of Cudahy
- City of Downey
- City of Glendale
- City of Huntington Park
- City of Maywood
- City of Paramount
- City of South Gate
- Burbank-Glendale-Pasadena Airport Authority

Chair

Ali Sajjad Taj
Council Member
City of Artesia

Vice-Chair

Sean Ashton
Councilmember
City of Downey

Secretary

Vrej Agajanian
Councilmember
City of Glendale

Treasurer

Jose R. Gonzalez
Mayor
City of Cudahy

Internal Auditor

Alejandra Cortez
Councilmember
City of Bell Gardens

Executive Director

Michael R. Kodama

General Counsel

Matthew T. Summers

Ex-Officio

William Rawlings
City Manager Representative

transit corridors that are not considered EJ. The entire WSAB Transit Corridor Study Area (as illustrated in Figure S-1. WSAB Transit Corridor Study Area) should be analyzed as an Environmental Justice (EJ) Corridor. Metro’s own goals for working with EJ communities is to strengthen the networks and create opportunities for the EJ communities to work with Metro for their improvement. This “study” does the opposite of the goal. It does not recognize that a community is designated an EJ community because it has significant environmental issues. Every impact in an EJ community that negatively changes the environment is significant.

9. FTA and DOT’s guiding EJ principles include: the desire to avoid, minimize or mitigate disproportionately high and adverse human health and environmental effects, including social and economic effects on minority populations and low-income populations. Doing so will help prevent the denial of, reduction in, or delay in the receipt of benefits by minority and low-income populations. The current EJ analysis and lack of adequate mitigations does not accomplish this identified principle.
10. Housing is a critical issue for Los Angeles County. The county cannot afford to lose a single residence. Where it is necessary to acquire residential property to construct this transit line, it is also critical to recognize these lost housing units cannot just be lost. One cannot agree with the statement on 4-35 that “there is sufficient replacement housing” in the county. Additionally, this section 4.3 also states the number of occupants incorrectly. The density of individual’s living in this area is the highest in the county. Due to the cost of housing, there often is more than one family living in a single-family residence. The housing lost should be replaced by comparable housing types and affordability. This section additionally, like many other sections of the Draft EIR/S makes reference to Metro policies without providing a link to them, so it is very difficult if not impossible to evaluate the fairness to an individual being impacted by property acquisition.
11. Housing that loses its backyards may be able to exist, depending on the amount of private space lost, the loss of open space (4.3) also creates negative impacts on residents. These communities are park poor. Removing the backyards further impacts the requirement for private open space. Similarly, removing trees, that help reduce the heat island effect in urbanized areas and create more livable neighborhoods adversely changes its character. Several of the cities have been working hard to plant trees to improve air quality and address climate adaptation in their communities. It is recommended that each tree removed, be replaced with two comparable trees deemed most suitable for the placement with corresponding upkeep until such trees are fully established. It is important for the communities and will help mitigate the corridor’s impact on the environment.

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 Cerritos
- City of Cudahy
- City of Downey
- City of Glendale
- City of Huntington Park
- City of Maywood
- City of Paramount
- City of South Gate
- Burbank-Glendale-Pasadena Airport Authority

Chair

Ali Sajjad Taj
Council Member
City of Artesia

Vice-Chair

Sean Ashton
Councilmember
City of Downey

Secretary

Vrej Agajanian
Councilmember
City of Glendale

Treasurer

Jose R. Gonzalez
Mayor
City of Cudahy

Internal Auditor

Alejandra Cortez
Councilmember
City of Bell Gardens

Executive Director

Michael R. Kodama

General Counsel

Matthew T. Summers

Ex-Officio

William Rawlings
City Manager Representative

12. Metro should work with Eco-Rapid Transit, Gateway Cities COG and the Gateway Cities City Manager Technical Advisory Committee (TAC) to expand the definition of the local 3% contribution to include the planning and projects of cities that they have undertaken in anticipation of the development of this line. Cities and government agencies have been working together for over 20 years in anticipation of this project as evidenced by Caltrans improvements on the I-105-Freeway as well as related improvements along the corridor completed by local municipalities that support the WSAB. These planning and implementation costs incurred by cities should be included in calculating the local 3% funding contribution. An additional issue of fairness and equity is that Gateway Cities should only pay the 3% local contribution for the portion of the line directly adjacent to Gateway Cities. The City of Los Angeles should cover the Los Angeles portion of the line. An example of how this was done in the past is illustrated in the example of Inglewood and Los Angeles along the Crenshaw Line.

13. Whichever Maintenance and Storage Facility is chosen, it needs to be developed in a manner to reduce the impacts on the surrounding neighborhoods. This includes a landscape buffer, rails and connectors that reduce sound, quieter signals and sound proofing of maintenance building to reduce overnight sound. Earlier discussions with the Metro Maintenance Supervisor also indicated possibilities of joint recreation development of the site. Metro staff presentations have included pictures of the Santa Monica Maintenance Facility, yet the EIR/S says the improvements pictured – landscape buffering, parklike land, etc., will not be done at this facility. This is misleading. The WSAB Maintenance and Storage Facility (MSF) is adjacent to housing and commercial businesses and should include every mitigation that the Santa Monica Maintenance facility received. In both cases the proposed MSF facilities would be situated on open space that was used as a community gathering space. These are important community assets that will be a significant loss.

14. During Metro’s public hearings and community meetings an estimate for cost of the Staff Preferred Alternative was shown to the public. It was primarily made up of Measure M funding that has already been secured and this prior identification of funds was used largely to justify choosing Alternative 3 as the Staff Preferred Alternative. Focusing solely on funding that Metro already has identified for the project not only locks in a lesser transit project but it eliminates the potential for Metro and/or other municipalities or entities to secure money for additional phases of the project that do not yet have identified funds as well as possible TOD and recreational opportunities that may only be feasible if they are included in the Locally Preferred Alternative analysis. For example, if housing funding was used to acquire some of the staging properties identified for the project with the commitment that the land would be used for residential purposes after construction then

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 Cerritos
- City of Cudahy
- City of Downey
- City of Glendale
- City of Huntington Park
- City of Maywood
- City of Paramount
- City of South Gate
- Burbank-Glendale-Pasadena Airport Authority

Chair

Ali Sajjad Taj
Council Member
City of Artesia

Vice-Chair

Sean Ashton
Councilmember
City of Downey

Secretary

Vrej Agajanian
Councilmember
City of Glendale

Treasurer

Jose R. Gonzalez
Mayor
City of Cudahy

Internal Auditor

Alejandra Cortez
Councilmember
City of Bell Gardens

Executive Director

Michael R. Kodama

General Counsel

Matthew T. Summers

Ex-Officio

William Rawlings
City Manager Representative

transportation funding that must be used only for transportation purposes would be freed up to be used for other amenities and transportation features along the line. Another example could be if all identified (and potential satellite) parking sites were made into parking structures with recreational facilities on the top of the structure, transportation money could be combined with funding for recreational facilities to assist with acquisition of sites and promote recreation that could be accessed through transit.

The following comments have been prepared by Eco-Rapid Transit in accordance with the National Environmental protection Agency (NEPA) and California Environmental Quality Action (CEQA) law to effectively reduce any potential adverse impacts associated with the Metro-proposed WSAB project to a level of insignificance.

The following are specific comments by Section and Page.

Executive Summary

S-3 – Eco-Rapid Transit supports Alternative 1 (Los Angeles to Pioneer Station) and Design Option 2 (Addition of Little Tokyo Station)

Purpose and Need

1-3 Eco-Rapid Transit concurs with Metro’s assessment regarding project need. The corridor has:

- High population and employment densities
- High number of transit dependents
- Environmental justice communities along most of the corridor from Little Tokyo through most of Gateway Cities.
- Significant goods movement activities along the entire corridor
- Significant increases expected in travel demand
- Operates with a constrained freeway and arterial system
- Limited travel options
- Limited connections to the Metro and Regional Rail System
- Limited Transit investment

The West Santa Ana Branch light rail transit project supports a high number of environmental just communities and rights a wrong that should have been addressed many years ago.

Page 1-4 Eco-Rapid Transit concurs with Metro’s Project Goals:

- Goal 1: Provide Mobility Improvements
- Goal 2: Support Local and Regional Lan Use Plans and Policies
- Goal 3: Minimize Environmental Impacts
- Goal 4: Improve Cost Effectiveness and Financial Feasibility
- Goal 5: Promote Equity

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 Cerritos
- City of Cudahy
- City of Downey
- City of Glendale
- City of Huntington Park
- City of Maywood
- City of Paramount
- City of South Gate
- Burbank-Glendale-Pasadena Airport Authority

Chair

Ali Sajjad Taj
Council Member
City of Artesia

Vice-Chair

Sean Ashton
Councilmember
City of Downey

Secretary

Vrej Agajanian
Councilmember
City of Glendale

Treasurer

Jose R. Gonzalez
Mayor
City of Cudahy

Internal Auditor

Alejandra Cortez
Councilmember
City of Bell Gardens

Executive Director

Michael R. Kodama

General Counsel

Matthew T. Summers

Ex-Officio

William Rawlings
City Manager Representative

Page 1-4, 1-6 and 1-7 – Eco-Rapid Transit concurs with Metro’s identification of the existing study area. The EIR/S changes the boundaries of the Project Area from 50’ to 1 mile, without a real explanation as to why the impacts would change to a smaller area, especially during construction. On page 1-5, Section 1.3.1, Metro identifies the cities of Maywood, Huntington Park, Cudahy, Bell Gardens and South Gate as multifamily neighborhoods. Eco-Rapid Transit believes that the City of Bell should also be included on this list. Eco-Rapid Transit concurs with Metro that the study area maps on page 1-6 and 1-7 identifies the study area and shows significant population and employment density in the corridor.

Page 1-9, Figure 1-4 Activity Centers - The figure and analysis are missing important activity centers in the corridor such as Pacific Boulevard in Huntington Park, Bicycle Hotel and Casino in Bell Gardens, the Columbia Memorial Space Center in Downey and River LA recreation area along the Los Angeles River.

Alternatives Considered/Project Description

Page 2-15, Figure 2-2 – Eco-Rapid Transit appreciates the inclusion of High-Speed Rail from Burbank Airport to Union Station and the Link Union Station Project. Is the LA Streetcar project included in the analysis? This could potentially connect Broadway, 7th/Metro and 7th/Alameda together and provide Downtown Los Angeles connectivity with a proposed Alternative 1 alignment to Union Station.

Transportation

Page 3-72 When was the parking study conducted? Parking analysis conducted as part of the Near-Term Scope and Metro TOD SIP seems to be missing. There is a conflict between this study, prior studies and experience. Additional parking study to determine accurate parking demand is needed. Metro also needs to analyze the potential for joint development opportunities for all parking sites, the potential for satellite parking sites, and amenities for parking (and TOD development) using the Metro/Eco-Rapid Transit report, Transit Oriented Development Strategic Implementation Plan (TOD SIP) and comparable examples such at the South Pasadena Mission station, the Pasadena Del Mar station and the Claremont station. Any additional parking demand uncovered in a more adequate parking study should be provided to prevent severely impacting transportation in the cities most in need of parking or drawing additional parking to station areas.

Page 3-73 The parking analysis claims that the parking occupancy numbers were gathered during observations made during peak parking periods. According to information in the Appendix, the parking analysis in the corridor was conducted at various times Tuesday through Friday in September, 2017, therefore claim that the parking occupancy information was gathered during peak parking periods is false and is not acceptable for any parking study. The parking study should include morning, mid-day, afternoon and evening parking counts. It should be conducted on a weekday (Tuesday, Wednesday or Thursday) and weekend (Saturday or Sunday). It should account for specific local conditions. It should include public and private parking in the station area (current and future, FY2042).

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 Cerritos
- City of Cudahy
- City of Downey
- City of Glendale
- City of Huntington Park
- City of Maywood
- City of Paramount
- City of South Gate
- Burbank-Glendale-Pasadena Airport Authority

Chair

Ali Sajjad Taj
Council Member
City of Artesia

Vice-Chair

Sean Ashton
Councilmember
City of Downey

Secretary

Vrej Agajanian
Councilmember
City of Glendale

Treasurer

Jose R. Gonzalez
Mayor
City of Cudahy

Internal Auditor

Alejandra Cortez
Councilmember
City of Bell Gardens

Executive Director

Michael R. Kodama

General Counsel

Matthew T. Summers

Ex-Officio

William Rawlings
City Manager Representative

Page 3-78 The statement that there will be no parking spillover because no transit parking is provided does not make sense and is not backed up by any parking analysis in this report. Use of street parking may still be considered as spillover and must be calculated and mitigated or the analysis is inadequate.

Page 3-105 Parking monitoring is not adequate. The parking monitoring system needs to be based upon a set of guiding parking principles agreed to by Metro and the local jurisdictions. It should be a comprehensive on and off-street parking analysis by block, station area and for the corridor. This allows use of parking resources at various stations to meet Metro parking demand. The monitoring system should be inclusive of all parking users and not focus only on Metro customers. It must include and yet not be limited to visitors, customers, employees, residents and Metro commuters. It must analyze and reduce potential parking spillover issues, especially in existing residential neighborhoods.

Affected Environment and Environmental Consequences

Page 4-3, Table 4.0.1 - The Safety and Security thresholds in the environmental document are not substantial enough (Section 4.1.1.1, pg. 4-3 table) - 100 feet is too little to adequately address safety concerns - 0.25 mile is 1,320 feet so 100 feet is barely over 0.01 mile. Safety and security is important during construction and in the station areas. The feasibility of patrol in every station should be assessed, both during construction and operations.

Page 4-9 - It appears analysis checking for consistency with local plans looks primarily at general plans and bicycle plans but no CAPS or otherwise local master plans/development plans (Table 4.1.4). All adopted land use documents pose potential conflicts with the project and should be analyzed.

Page 4-11 - WSAB provides important access to jobs and institutional/public facilities, medical facilities and recreational uses.

Page 4-13 to 4-29 - Acquisitions and Displacements. Any acquisition that is not specifically for realignment, rail, or a station should be analyzed for the potential to later be used (even if shared) for housing, recreation (active and/or passive), economic development, and parking replacement.

Page 4-17 - Eco-Rapid Transit and Metro approved the transit-oriented development strategic implementation plan (TOD SIP). This is an important document that provides policy direction in the corridor. In addition, the City of Huntington Park's General Plan Update includes Target Areas for Transit Oriented Development (TOD) to be reflected in table 4.1.4 under "Policies for compact and denser development, including TODs".

Page 4-17 - The alignment for Alternative 1 has no impact making it an acceptable choice for the Locally Preferred Alternative (LPA).

Page 4-18 - Eco-Rapid Transit believes that the removal of parking and lack of commuter parking in Huntington Park and Downey can have serious and significant impacts in communities that already suffer from parking impacts. Much of the neighborhood near the Huntington Park stations are overcrowded with multiple families sharing housing. Many of these families have multiple cars and struggle to find parking spaces for their vehicles. At Gardendale, Eco-Rapid Transit and the City of Downey anticipate future development efforts will require additional parking, with the number of boardings higher than that projected in the Draft EIS/EIR. There is a need to consider the impact of Metro commuter parking at this site to prevent

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 Cerritos
- City of Cudahy
- City of Downey
- City of Glendale
- City of Huntington Park
- City of Maywood
- City of Paramount
- City of South Gate
- Burbank-Glendale-Pasadena Airport Authority

Chair

Ali Sajjad Taj
Council Member
City of Artesia

Vice-Chair

Sean Ashton
Councilmember
City of Downey

Secretary

Vrej Agajanian
Councilmember
City of Glendale

Treasurer

Jose R. Gonzalez
Mayor
City of Cudahy

Internal Auditor

Alejandra Cortez
Councilmember
City of Bell Gardens

Executive Director

Michael R. Kodama

General Counsel

Matthew T. Summers

Ex-Officio

William Rawlings
City Manager Representative

residential spillover into both Downey and Hollydale (in South Gate). Hollydale is adjacent to the Gardendale station. This is also an issue at the Pioneer Station in Artesia. As indicated in the EIS/EIR study, the Artesia terminus station does not have sufficient commuter parking, in an area that is already deficient in parking spaces.

Page 4-18 - In terms of station design, what will be the experience of the rider when they emerge from the station? (Was that experience analyzed for impacts?)

Page 4-19 - Street closures. The document suggests no division to community and no affect because access is still possible despite permanent road closures – what would that actual affect be?

Page 4-19 – Barriers. What specific impacts to truck traffic for turning restrictions? Actual design of barriers – visual blockage? How will this be mitigated?

Page 4-19 and 4-20 - Pedestrian Bridges. Demolishing an aerial bridge and replacing it with an underground tunnel might have safety and security impacts that need to be mitigated/avoided/minimized. Metro is responsible for the change, not the school district, so expenses incurred for an increased need in safety and security should be incurred by Metro as a proper mitigation.

Page 4-20 - Property acquisitions. Why are there any partial property acquisitions? A property owner cannot be made whole when there is only a partial acquisition.

Page 4-22 - Potential in Alternative 1 to get mitigation funds to pay for bike plans for cities of Huntington Park, Cudahy, South Gate and Bell. Including this in the LPA and environmental analysis allows these cities increases in opportunities to secure funding for their bike plans and projects, e.g., eligibility for infrastructure grants.

Page 4-27 and 4-28 - Maintenance Facility. The MSF proposed in Paramount is less than 1/2 mile from Paramount High school, this could possibly affect traffic (bike, ped, car) along Rosecrans. Additionally, this is a community gathering space; resource that will be removed and there is no indication from the Draft EIR/S regarding replacement. There is no discussion of appropriate buffering from the residential neighborhoods.

Page 4-27 and 4-28, Figure 4.3-16 - Maintenance Facility. MSF in Bellflower. The stretch of property adjacent to Virginia Avenue (current BMX and northern recreational area) could easily be turned into a park to buffer the MSF from the adjacent residential uses. This was done at the MSF in the Los Angeles/Santa Monica area and should be analyzed and considered here. Also, it would be good to look into what funds might be possible to be used here like Quimby, rails to trails, etc. so that Metro is aware of possible funding and/or savings for this component of the project and since financing is part of the project goals.

Page 4-30 – Above grade alignment at certain locations could divide established communities. Some of the communities may prefer columns over berms and walls to reduce physical barriers.

Page 4-30, 4-31 & 4-37 - Acquisitions and Displacements. Tables 4.3.3 and 4.3.4 only represent the permanently displaced based on aerial structures, stations, TPSS sites, and grade crossings. There needs to be analysis on how many businesses (and employees) are likely to experience business interruptions during construction. Also, a table illustrating this analysis of business interruption needs to be introduced by alternative alongside the previously mentioned table.

Page 4-35 - Acquisitions and Displacements. The City of South Gate, as well as the nursery business owner, should be consulted about potential viable replacements should the nursery business be displaced. Additionally, there should be analysis that

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 Cerritos

City of Cudahy

City of Downey

City of Glendale

City of Huntington Park

City of Maywood

City of Paramount

City of South Gate

Burbank-Glendale-Pasadena
Airport Authority

Chair

Ali Sajjad Taj
Council Member
City of Artesia

Vice-Chair

Sean Ashton
Councilmember
City of Downey

Secretary

Vrej Agajanian
Councilmember
City of Glendale

Treasurer

Jose R. Gonzalez
Mayor
City of Cudahy

Internal Auditor

Alejandra Cortez
Councilmember
City of Bell Gardens

Executive Director

Michael R. Kodama

General Counsel

Matthew T. Summers

Ex-Officio

William Rawlings
City Manager Representative

accounts for residential displacements for residents currently living in rent-controlled units and relocation to market-rate units.

Page 4-35 - Communities and Neighborhoods. The SCAG 2016-2040 RTP/SCS is the document used for thresholds and goals. Did the smaller cities provide updated information to SCAG for this document? Is it accurate? It is not uncommon for smaller staffs to rely on larger entities to update information even if it is not the most up to date information. If it is not the most accurate data, Metro should ask cities to provide the most up-to-date accurate information to be plugged into the analysis so that proposed mitigations address the most pertinent impacts.

Page 4-35 and maps on page 4-37 - Communities and Neighborhoods. Do any of the stations pose a problem in cities based on access and mobility? Does the station reinforce community character and cohesion and how was this analyzed in the environmental document? Was community stability on a station by station analyzed? Access and mobility can mean parking provision, at grade crossings, turning restrictions, street closures and vehicle delay at intersections. Was analysis of this conducted for all traffic such as truck traffic and increased passenger traffic traveling to station parking areas?

Page 4-38 & 4-40 - Acquisitions and Displacements. 188 partial acquisitions (Table 4.3.1) for Staff Preferred Alternative 3. This far exceeds Alternative 1 with only 20 partial acquisitions. This is a great difference when it comes to construction interruption of residents lives and permanent changes to residential property.

Page 4-40 - Lack of commuter parking hurts access to stations in Huntington Park and at Gardendale and will impact neighborhoods from parking spillover.

Page 4-41 - Acquisitions and Displacements. Alternative 1 - no displacements of residents and only 1 business displacement (23 employees) with Design option 2. The Preferred Staff Alternative 3 would displace approximately 65 businesses (352 employees). Additionally, The City of Bellflower, as well as the sports park and BMX complex business owner, should be consulted about potential viable replacements should they be displaced.

Pages 4-41, 4-44 and 4-47 - Analysis of impacts to access and mobility, and community character in the Huntington Park Station Areas need to include impacts from the proposed design to existing pedestrian amenities such as wide and comfortable sidewalks, and existing street trees. Provision of minimum requirements and clearances for pedestrian access will not suffice in station areas, and areas of existing high pedestrian volume and/or distinctive community and main street character such as Pacific Boulevard and Randolph St in Huntington Park. Preservation of existing pedestrian amenities will need to be prioritized, or replaced in-kind and included in the analysis. In addition, the proposed designs of station areas need to ensure best-in-practice strategies for first- and last-mile connectivity improvements. Page 4-56 - Since 87 to 89 percent of the residents have lived in their homes for more than one year, they are living in stable, existing residential communities that will need to be protected from potential environmental consequences. This is particularly important as we address both parking spillover and cruising for parking in stable neighborhoods that can exacerbate already poor air quality and traffic conditions in the residential areas surrounding the WSAB stations.

Page 4-42 - Acquisitions and Displacements. Phasing acquisition of a single site only helps Metro with relocation activities and does not reflect the complete scale of the business disruption created for those properties with special location considerations. This is not a sufficient mitigation for the difficulty created by having special

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 Cerritos
- City of Cudahy
- City of Downey
- City of Glendale
- City of Huntington Park
- City of Maywood
- City of Paramount
- City of South Gate
- Burbank-Glendale-Pasadena Airport Authority

Chair

Ali Sajjad Taj
Council Member
City of Artesia

Vice-Chair

Sean Ashton
Councilmember
City of Downey

Secretary

Vrej Agajanian
Councilmember
City of Glendale

Treasurer

Jose R. Gonzalez
Mayor
City of Cudahy

Internal Auditor

Alejandra Cortez
Councilmember
City of Bell Gardens

Executive Director

Michael R. Kodama

General Counsel

Matthew T. Summers

Ex-Officio

William Rawlings
City Manager Representative

replacement needs. Consultation with the cities and property owners, with binding mitigation, would allow the property/business owners to determine what best meets the needs of their business(es).

Page 4-43 Acquisitions and Displacements. Displacement of businesses resulting in some permanent job losses by employees needs to be better mitigated by Metro. Offering to "coordinate with the appropriate jurisdictions regarding business relocation" does not guarantee job placement for employees with job losses. Job losses due to the project must be replaced with a concrete strategy articulated by Metro in the environmental document in order to illustrate that the problem created is completely addressed.

Page 4-46 - Acquisitions and Displacements. Having a MSF located directly adjacent to residents places noise, vibration, aesthetic, and potential air quality impacts on residents, many of whom may be considered sensitive receptors depending on health considerations and age. A landscaped and/or other aesthetically pleasing noise and air quality buffer between the MSF and residential uses must be present to offset these potential impacts.

Page 4-48 Visual and Aesthetics. Viewer sensitivity is a subjective threshold and is insufficient in determining the full extent of whether or not a visual or aesthetic impact is potentially created. Adhering to a similar scale, mass, form and lighting level does not address aesthetic degradation of a site when changes are made by the project. Also, compatibility with the visual character of a highly urbanized area is further inadequate in determining a potential significant impact in the area of visual and aesthetics. For example, the introduction of an aerial alignment rail may be considered compatible in visual character to an urbanized area but to a residential property owner who once had a view of the open sky and now directly faces a concrete railway, a dramatic impact is created. Treatment to railways visible to any residential property should be included as aesthetic mitigations. Strategic landscaping to preserve privacy for businesses and residents should be included as aesthetic mitigations. Landscaping stations and striving to make those stations aesthetically pleasing is a start in mitigation but is not sufficient in totality of mitigating visual and aesthetic impacts along the line in its entirety.

Page 4-49 - Visual and Aesthetics / Historic. The Navens Horse Stable needs to be analyzed as a scenic resource and views of it as scenic vistas. It is listed as a place of historic and cultural property and should not be discounted simply because of the materials that are standardly used for horse stables. Views of the horse stables contribute to the cultural character of the area and must be considered and mitigated when it comes to being a scenic resource.

Page 4-52 - Visual and Aesthetics. Section 4.4.2.3 Visual Character and Quality lists the categories analyzed and taken into consideration for each district. Suburban Residential Landscape Unit, and suburban Residential Units are mentioned in this section. However, when analyzing Figure 4.4-1, these categories are not included and are only included in 3 segments of Figure 4.4-2. Huntington Park, Bell, Cudahy, South Gate, Paramount, Bellflower, Artesia and Cerritos, as well as adjacent cities, should all be considered under the Suburban Residential Landscape Unit as the properties within less than a mile from the line are all part of a suburban development, often largely residential, that happens to have high density. The higher density of the population does not and should not negate the suburban development and character of these cities along the project line.

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 Cerritos
- City of Cudahy
- City of Downey
- City of Glendale
- City of Huntington Park
- City of Maywood
- City of Paramount
- City of South Gate
- Burbank-Glendale-Pasadena Airport Authority

Chair

Ali Sajjad Taj
Council Member
City of Artesia

Vice-Chair

Sean Ashton
Councilmember
City of Downey

Secretary

Vrej Agajanian
Councilmember
City of Glendale

Treasurer

Jose R. Gonzalez
Mayor
City of Cudahy

Internal Auditor

Alejandra Cortez
Councilmember
City of Bell Gardens

Executive Director

Michael R. Kodama

General Counsel

Matthew T. Summers

Ex-Officio

William Rawlings
City Manager Representative

Pages 4-53 to 4-57 - Visual and Aesthetics. Table 4.4.2 often characterizes the visual quality of the area as "inharmonious, disorderly, and incoherent." These are often the mix of land uses, and the character areas in environmental justice communities are described. Metro should not discount the need for visual and aesthetic mitigations along the entire line because of its determination of the visual quality of such an area. Landscape buffers and visual treatments should be incorporated into the entire design and elements of the project, such as berms, columns, rail, and other planned improvements, to address the aesthetic impacts created by the project and improve the visual quality of the area, not simply replace like for like aesthetics, especially in environmental justice communities.

Page 4-57 Visual and Aesthetics. Eco-Rapid Transit believes the cities should be empowered by Metro to weigh in on how they want individual station treatments to be handled as mitigations in visual and aesthetic impacts.

Page 4-63 - Acquisitions and Displacements. Does Metro have an officially adopted internal acquisition and relocation policy? If so, what is it? It isn't sufficient to quote the law. There needs to be clear details on the process. For example, in relocation, how is FF&E handled, moving logistics as well as moving expenses, comparable location not just comparable compensation, etc.

Page 4-64 - Acquisitions and Displacements. Section 4.3.1.2 states "The purchase of an easement is accomplished through a one-time payment and an easement deed is recorded" This does not speak to how the easement will be maintained. Further, earlier in this section it is noted that there may be temporary easements. In Metro public presentations, the example of a sound wall as a temporary easement where the sound wall was constructed on private property under a temporary easement and once constructed the "property" was returned to the property owner. There is not discussion about maintenance or the type of long-term impact this may have on a property. To state that the property is still "economically viable" could mean it's worth more than zero but does not acknowledge the loss of property value due to the improvements introduced by Metro.

Page 4-65 - Acquisitions and Displacements. The paragraph that began in the page prior states that in order to satisfy NEPA property displacements were evaluated to determine if the use was no longer possible after project implementation. It does not speak to the lasting effect on that particular use. An example, a residence may still be feasible for residential uses and purposes but if the outdoor recreational space is compromised then the quality of the residential space is compromised. The quality of life or quality of land use performance and how it is affected (not whether it is simply possible or not) needs to be analyzed and compensation and/or relocation needs to be determined based on the totality of the effect on not just the use but the overall quality of life or use itself.

Page 4-66 - Acquisitions and Displacements Why isn't there a table showing construction impacts on acquisitions and relocations, why are only permanent property acquisitions represented? Without a synthesis of the construction impacts on acquisitions and relocations, it is more difficult to analyze the impacts of acquisitions and relocations during the time of construction which is likely to last years.

Page 4-67 - Can design considerations near the I-10 freeway be reexamined to reduce property purchases? This could result in substantial cost savings for the project.

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 Cerritos
- City of Cudahy
- City of Downey
- City of Glendale
- City of Huntington Park
- City of Maywood
- City of Paramount
- City of South Gate
- Burbank-Glendale-Pasadena Airport Authority

Chair

Ali Sajjad Taj
Council Member
City of Artesia

Vice-Chair

Sean Ashton
Councilmember
City of Downey

Secretary

Vrej Agajanian
Councilmember
City of Glendale

Treasurer

Jose R. Gonzalez
Mayor
City of Cudahy

Internal Auditor

Alejandra Cortez
Councilmember
City of Bell Gardens

Executive Director

Michael R. Kodama

General Counsel

Matthew T. Summers

Ex-Officio

William Rawlings
City Manager Representative

Page 4-150 – Sound Walls in the Pacific/Randolph and Florence/Salt Lake Station Areas. The Huntington Park Bicycle Master Plan includes a proposed Class 1 Bike Path along the ROW on Salt Lake Avenue that would create additional first/last mile connections to the Florence/Salt Lake station from the surrounding residential communities. Constructing 8-foot-tall sound walls on both sides along some sections of the rail ROW per Metro’s current design would create an unsafe condition for a future Class 1 bike path that will be visually cut-off from the surrounding development. Can the location, extents, and design considerations for the proposed sound walls along Salt Lake Avenue be reexamined to facilitate options for safe bike connectivity along this corridor? Additionally, the design of the sound walls disconnects the neighborhoods and create an unsafe environment and potential blighting influence.

Page 4-154 – Image 4.4-7 in the conceptual rendering indicates three sets of fences separating both the Light Rail line and the freight rail line in the proposed configuration (the existing condition with the freight rail does not have a fence currently). A single fence designed to maximize visual connections across both sides of the street could suffice to prevent pedestrians from trying to cross the tracks and enhance public safety, while too many fences will potentially create a hostile and unwelcoming urban environment. The fences used, should be designed to encourage, connectivity of the neighborhoods and utilize landscape design to lower sound and lessen environmental impacts.

Page 4-175 - Metro should reconsider the pros and cons of retaining walls versus columns at 183rd and Gridley.

Page 4-180 – The Pioneer Station needs to be designed to accommodate more than cars. The scale of the number of parking spaces needed and lack of the parking structure to accommodate additional uses may be prohibitive and unless properly addressed at a local level by the City of Artesia and will negatively impact potential development opportunities in the station area. The lack of sufficient parking for the terminus station, in addition to the closure of 187th Street, will inevitably result in residual adverse impacts to residential neighborhoods and local businesses in the downtown Artesia area as well as adjacent land uses located in the City of Cerritos. Therefore, additional satellite parking structures should be constructed in a manner to support the parking demand while supporting future commercial development. The parking structures should be designed to accommodate more than just Metro commuters, especially on evenings and weekends. Also, the current design plan shows a plaza located south of the station and adjacent to the parking structure. A public plaza to the north of the future station, not hidden to the south, is essential to provide visual and physical connectivity between the station and Downtown Artesia necessary to maximize the station’s potential.

Page 4-189 - Visual and Aesthetics. Lighting located in a manner to protect businesses and residents from glare is essential in aesthetics mitigation. However, the level of lighting and placement of lighting must also reflect the safety and security needs along the alignment and station areas and transitions to station areas. Not introducing a lighting source in an area to avoid an aesthetic impact may create a safety and/or security hazard. For example, if a column is placed along the alignment but no lighting is placed underneath it so as to avoid an additional light source creating an aesthetic impact, that darkened portion of the property may become a problem both for keeping pedestrians off the alignment or for security of individuals who could then be subject to crimes. Studies indicate that lower levels of

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 Cerritos
- City of Cudahy
- City of Downey
- City of Glendale
- City of Huntington Park
- City of Maywood
- City of Paramount
- City of South Gate
- Burbank-Glendale-Pasadena Airport Authority

Chair

Ali Sajjad Taj
Council Member
City of Artesia

Vice-Chair

Sean Ashton
Councilmember
City of Downey

Secretary

Vrej Agajanian
Councilmember
City of Glendale

Treasurer

Jose R. Gonzalez
Mayor
City of Cudahy

Internal Auditor

Alejandra Cortez
Councilmember
City of Bell Gardens

Executive Director

Michael R. Kodama

General Counsel

Matthew T. Summers

Ex-Officio

William Rawlings
City Manager Representative

lighting are more often greater areas of crime. Therefore, Metro should consider placing new sources of lighting in areas that could pose potential crime or safety issues and mitigate the aesthetic impact through placement and direction of the lighting itself. Thus, both sets of impacts are mitigated.

Page 4-190. Visual and Aesthetics. Wayfinding signage needs to be included in the development of any design standards used for the project and incorporated into all station areas with content directed by local municipalities and business owners (VA PM-1). If consistency with MRDC and Systemwide Station Design Standards do not include landscaping along the route itself, then this mitigation is inadequate. There must be treatments. Landscaping at the Bellflower MSF Site Option needs to augment existing landscaping at a minimum, as mitigation because the existing landscaping buffer is for a much less intense land use on the site (VA PM-5). Adhering to local zoning is not sufficient as an aesthetic mitigation, improvements should be subject to design review for affected local municipalities (VA PM-6); and Lighting should not be avoided as new sources but should be located and directed in a manner that is both aesthetically pleasing as determined by local entities and provides safety and security in darkened areas along the project (VA PM-7).

Page 4-191 - Visual and Aesthetics. Views of historic and cultural resources should be considered and analyzed as scenic vistas along the corridor.

Page 4-192 - Visual and Aesthetics. The CEQA requirement for determining if the Project would degrade the existing visual character or quality of the site and its surroundings does not qualify whether or not the Project is in an urbanized area (Checklist in Appendix G). To create a double standard for degradation of the site and its surroundings is to ignore potential Aesthetic impacts created by the project. It is not enough to avoid conflicts with applicable zoning and other regulations. This is addressed in analysis of Land Uses. The impact on the scenic quality of a site and/or its surroundings must meet a higher standard. One recommendation is to create a design review committee (using the Public Art policy Metro already employs, as a model) made up of local stakeholders to review potential aesthetic treatments wherever there is an aerial alignment, views from residences, station wayfinding signage, and view corridors to cultural and historic properties. The treatments agreed upon by such a committee should be binding. This is one possible mitigation strategy Metro can employ.

Page 4-193 - Eco-Rapid Transit recommends the inclusion of local artists from the impacted communities. This can be done by working with the local jurisdictions in the community.

Pages 4-193 to 4-196 - Visual and aesthetic impacts must be analyzed for the entire route, not just the station areas and/or areas called out by Metro. Any time the line is visible, a screening mitigation, special treatment, or potential visible impact to be mitigated needs to be considered.

Page 4-197 - Visual and Aesthetics/Safety and Security. Providing lighting only within the areas of the MSF may avoid potential source of glare issues but it might also create new safety and security impacts. The mitigation of aesthetics should not create impacts in the areas of safety or security. Both must be analyzed together.

Page 4-198 - Visual and Aesthetics. Does the project as proposed meet SCAQMD standards? (Even when cumulative impacts and existing conditions are taken into consideration?) Because if not, the project will be unable to secure federal (possibly state/local) funding for the project and that is contrary to the project goals. Do they meet the regional significance thresholds (need mitigation to meet)? Additionally, a

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 Cerritos
- City of Cudahy
- City of Downey
- City of Glendale
- City of Huntington Park
- City of Maywood
- City of Paramount
- City of South Gate
- Burbank-Glendale-Pasadena Airport Authority

Chair

Ali Sajjad Taj
Council Member
City of Artesia

Vice-Chair

Sean Ashton
Councilmember
City of Downey

Secretary

Vrej Agajanian
Councilmember
City of Glendale

Treasurer

Jose R. Gonzalez
Mayor
City of Cudahy

Internal Auditor

Alejandra Cortez
Councilmember
City of Bell Gardens

Executive Director

Michael R. Kodama

General Counsel

Matthew T. Summers

Ex-Officio

William Rawlings
City Manager Representative

threshold for establishing potential significant impacts on odors needs to be established. One possible threshold Metro could use to mitigate odor impacts could be to provide a reporting mechanism by which if an odor source with five (5) or more confirmed complaints in the new source area over the period of one year is considered to have a significant impact on receptors and must be mitigated through odor elimination monitoring and established strategies of odor elimination.

Page 4-218 - Eco-Rapid Transit recognizes the importance of regional connectivity, transit ridership and a decrease in VMT. It provides more access to regional employment opportunities.

Page 4-226 - Air Quality. Alternative 1, Option 2 would reduce daily VMT by 218,500. Design Option 2 would decrease road dust emissions in direct correlation with VMT, impacts related to operational odors and dust would be less than significant and mitigation would not be required (not sure how odor impacts are less than significant when no odor threshold is being used). The significant VMT reduction should be taken into account when deciding upon the LPA since it has a great air quality impact advantage over the Staff Preferred Alternative 3.

Page 4-227 - Greenhouse Gases. The DEIS/EIR states that Metro has developed policies toward controlling GHG emissions but does not specifically state it will adhere to the policies that have been developed (adopted was not the work used which may imply these are considerations only and not adopted actions).

Page 4-228 - Greenhouse Gases / Air Quality. The study area for GHGs is six counties under SCAG jurisdiction. This would seem to dilute any meaningful analysis of GHG impacts created specifically by the project. Further, there seems to be an emphasis on substantially reducing VMTs in order to address GHG emissions yet the Staff Preferred Alternative 3 has greater VMTs than Alternative 1, Option 2 which would make Alternative 1, Option 2 more advantageous as the Locally Preferred Alternative (LPA) as it pertains to GHGs (and air quality).

Page 4-230 - Greenhouse Gases. If automobile exhaust is a majority contributor to GHG emissions then what role does truck traffic play?

Page 4-232 - Alternative 1 reduces more GHG than other options because of its regional connectivity. This needs to be acknowledged in the environmental document and should be used to support the selection of Alternative 1, Option 2 as the Locally Preferred Alternative (LPA).

Page 4-235 - Greenhouse Gases. The DEIS/EIR states that "Although SCAQMD has regulatory role in the South Coast Air Basin, it has not adopted or proposed any quantitative thresholds that would be applicable to the proposed LRT corridor" yet projects that do not adhere to SCAQMD thresholds may not be eligible for future funding. So, it would appear that the SCAQMD quantitative thresholds are very applicable to the LRT corridor if Metro has any interest in securing future funding.

Page 4-236 - Greenhouse Gases. Analysis of Alternative 1 states the alternative would generate direct GHG emissions through operations at the MSF and indirect GHG emissions through energy use (for operations). However, the analysis of Alternative 3 (the Staff Preferred Alternative) states there is no direct source of emissions because it excludes the MSF. The inclusion of the MSF in analysis for Alternative 1 and exclusion of the MSF for Alternative 3 not only appears arbitrary and unscientific in approach but actually skews the claim of the analysis supporting Alternative 3 when there appears to be no material difference between direct

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 Cerritos

City of Cudahy

City of Downey

City of Glendale

City of Huntington Park

City of Maywood

City of Paramount

City of South Gate

Burbank-Glendale-Pasadena
Airport Authority

Chair

Ali Sajjad Taj
Council Member
City of Artesia

Vice-Chair

Sean Ashton
Councilmember
City of Downey

Secretary

Vrej Agajanian
Councilmember
City of Glendale

Treasurer

Jose R. Gonzalez
Mayor
City of Cudahy

Internal Auditor

Alejandra Cortez
Councilmember
City of Bell Gardens

Executive Director

Michael R. Kodama

General Counsel

Matthew T. Summers

Ex-Officio

William Rawlings
City Manager Representative

emission sources. This discrepancy needs to be addressed where the same application applies to both alternatives.

Page 4-240 - Noise and Vibrations. Where does the definition put forth that "noise is generally defined as unwanted sound" come from? What is the source material or threshold? Further, the human body may be susceptible to noise frequencies the human ear cannot detect. The assertion that there is no physiological impact because the human ear may not be sensitive to a frequency may be an error and should be analyzed in the document. Also, vibration is more than just sound waves. There is a reference in the Noise and Vibrations section to what counts as operational noise and it includes items such as special tracks, bells, MSF operation, but it does not specifically state noise generated from the tracks themselves (not under special circumstances, just the sound made from the tracks). If the cars chosen for the project are not steel wheels on steel tracks, then no real analysis of what noise is being generated by simple track use has been included in this analysis.

Page 4-243 - Noise and Vibrations. Table 4.7.1 Levels of Impact analyzes impacts based only on community annoyance. There is no analysis here reflecting impacts on human health as it pertains to noise and vibration nor upon businesses (such as sound studios) which may be impacted in a manner that has nothing to do with community annoyance and more specifically in business interruption or compromise. Page 4-244. Noise and Vibrations. Clearly the FTA Transit Noise and Vibration Impact Assessment Manual is being used as a threshold due to the partnership between Metro and FTA on the environmental document. However, is this a threshold that is used in environmental analysis for any projects outside of FTA's influence? What threshold is most frequently used to determine noise and vibration impacts as it pertains to CEQA and NEPA. It is unlike that the FTA threshold is an industry standard. Perhaps a more neutral threshold that is considered across a wide range of transportation projects should be used in the analysis of impacts as it pertains to noise and vibration.

Page 4-246 - Noise and Vibrations. Again, the FTA guidance document does not appear to be a strong enough threshold to determine true vibration impacts.

Page 4-248 - Noise and Vibrations. The document states that existing noise levels were identified at sensitive land uses. However, there appear to be sensitive land uses that were not taken into account such as schools directly adjacent to the tracks. Metro should provide the inventory and clusters it used and identify which are sensitive land uses. And any sensitive uses, such as schools, churches that provide daycare services, and any other use of builds that may or may not be consistent with the land use designations along the line should be included and analyzed.

Page 4-248 - Noise and Vibrations. The document states "Ambient vibration levels were not measured as part of this study because the FTA vibration impact assessment is not based on the ambient levels but rather on the FTA Vibration Impact Criteria". Most CEQA and NEPA studies on vibrations include an inventory of ambient levels of noise and/or vibrations. Stating that the project is located in an urban center and implying that high levels of noise is a normal part of the urban environment therefore negating the need for quantified data on vibration is inadequate analysis of the existing conditions of noise and vibrations, the quantified

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 Cerritos
- City of Cudahy
- City of Downey
- City of Glendale
- City of Huntington Park
- City of Maywood
- City of Paramount
- City of South Gate
- Burbank-Glendale-Pasadena Airport Authority

Chair

Ali Sajjad Taj
Council Member
City of Artesia

Vice-Chair

Sean Ashton
Councilmember
City of Downey

Secretary

Vrej Agajanian
Councilmember
City of Glendale

Treasurer

Jose R. Gonzalez
Mayor
City of Cudahy

Internal Auditor

Alejandra Cortez
Councilmember
City of Bell Gardens

Executive Director

Michael R. Kodama

General Counsel

Matthew T. Summers

Ex-Officio

William Rawlings
City Manager Representative

increase to be expected, and how that increase in noise and vibration will be mitigated for both residents and workplaces.

Page 4-312 - Noise and Vibrations. Section 4.7.5.1 begins with what appears to be a CEQA checklist question for noise levels but the end of the question has been altered to reflect ""in excess of standards established by FTA or in the local general plans or noise ordinances" which is not from the CEQA checklist. The question to be addressed is if the project increases ambient noise levels period, not if it increases noise levels as determined by general plans, noise ordinances and the FTA. The analysis must include analyzing the increase in ambient noise and how it will be mitigated.

Page 4-314 - Noise and Vibrations. There are no noise impacts anticipated from the parking facilities, none. This seems unrealistic. The operation of a parking lot should generate some noise that did not exist prior to the existence of the parking lot. This should be looked at realistically based on the operation of a parking lot, analyzed and mitigations for minimizing any noise generated from the parking facility should be included in the environmental document.

Page 3-342 - Geotechnical / Seismic. The discussion in 4.9.2.4 should include discussion about water reclamation and how it might be captured.

Page 4-344 - Geotechnical / Seismic. Since the proposed LRT alignment crosses at least one seismic fault, what measures is Metro taking to ensure that trains are not derailed in during a seismic event (for at-grade, aerial and underground)?

Page 3-348 - Geotechnical/Seismic. When a detailed liquefaction evaluation is conducted, binding commitment to mitigate whatever is discovered out of that evaluation should be included in this environmental document.

Page 4-376 - Geotechnical/Seismic. Truck routes with vehicles carrying hazardous materials that are altered due to the project (and street closures) must be analyzed to see if they increase the risk of accident (and accidental exposure) to sensitive receptors and hazardous materials in general.

Page 4-383 - Hazards. The location and number of environmental concern sites should be used in the environmental justice analysis as justification for a larger EJ study area/corridor.

Page 4-386 - Hazards. Groundwater contamination concerns should be reviewed to see if water reclamation could help address any impacts to groundwater potentially created by the project.

Page 4-395 - Hazards. The risk of hazardous substance emissions is identical for both Alternative 1 and Alternative 3, no risk. So, choosing Alternative 1 as the LPA would have the same impacts as the Staff Preferred Alternative.

Page 4-405 - Hazards. HAZ PM-2 Disposal of Groundwater (Operational) - some of the municipalities along the line have water reclamation already in place. This should be looked at and considered as part of an incorporated strategy to mitigate disposal of groundwater during operations.

Page 4-406 - Hazards. Metro should consider (and analyze the potential for) funding to clean up contaminated soil in the project that does not require transportation money.

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 Cerritos
- City of Cudahy
- City of Downey
- City of Glendale
- City of Huntington Park
- City of Maywood
- City of Paramount
- City of South Gate
- Burbank-Glendale-Pasadena Airport Authority

Chair

Ali Sajjad Taj
Council Member
City of Artesia

Vice-Chair

Sean Ashton
Councilmember
City of Downey

Secretary

Vrej Agajanian
Councilmember
City of Glendale

Treasurer

Jose R. Gonzalez
Mayor
City of Cudahy

Internal Auditor

Alejandra Cortez
Councilmember
City of Bell Gardens

Executive Director

Michael R. Kodama

General Counsel

Matthew T. Summers

Ex-Officio

William Rawlings
City Manager Representative

Page 4-436 - Water Resources. Community stakeholders support a station located at the Rio Hondo crossing. Consideration of a possible future station at this location should be included in the analysis in this section.

Page 4-451 - Energy. The use of low floor vehicles, charging at stations only, energy generating brakes, and under carriage charging, would enable trains to be powered by more sustainable energy sources, mitigate aesthetic impacts at stations (and along the route if catenaries or wires were eliminated) and would reduce energy resource expenditures which is consistent with project financial goals.

Page 4-463 - Electromagnetic Fields. Again, charging trains at stations would eliminate electromagnetic emissions along the route and help protect potential negative significant impacts on human health.

Page 4-510 - Eco-Rapid Transit is impressed with Metro's ability to mitigate noise and integrate into the community at the existing Santa Monica Light Rail Maintenance Facility. A similar approach and design to the Santa Monica model is necessary for the selected WSAB Maintenance Facility. The same Maintenance facility construction and operations impacts exist here as they do in Santa Monica.

Page 4-525 to 4-535 - Access to parklands and recreational facilities are important in the WSAB corridor. Access to the Los Angeles River and River LA project is more than a bicycle facility. It is also an important future parkland, cultural center and recreational facility.

Page 4-539 - Parklands and Community Facilities. Salt Lake Park will have parking impacts, there is potential for a structure with a recreational field/sports facility on top of the structure which will mitigate the parking impacts and will be consistent with the Parkland use. It also opens up the possibility for funding from recreational sources freeing up transportation funds being used for the project.

Page 4-540 - Parklands and Community Facilities. Mitigation Measure LU-1 (Consistency with Bike Plans) is inadequate as a mitigation for impacts created on Bike Paths. Local entities and municipalities should not have to change their plans to match Metro. Metro should incorporate improvements and designs into the project that helps satisfy the adopted bike plans of the local municipalities. This would truly mitigate impacts and not just satisfy a law of compatibility. In the cities of Cudahy, Huntington Park, South Gate, Maywood and Bell, there are possible bike path/plan conflicts with WSAB project (potential impact and mitigations are the same for Alternatives 1 and 3). Metro is interested in providing language to all cities to alter their existing bike plans so that there is no longer a conflict. The cities are under no obligation to do so. This is why there is a mitigation and why it is considered a potential significant impact without mitigation. This mitigation measure seems insufficient to mitigate the conflicts. Metro should be proposing (and analyzing in the FEIR) mitigations for each city that enables them to fulfill their bike plans. For example, they should be paying for designs and potentially actual bike path improvements for each of these cities. Another possibility is to assist cities with securing grants to make those bike path improvements that would then be consistent with the WSAB project. This can be done and should be legally required under CEQA/NEPA (and lack of making such mitigations has the potential to affect environmental justice issues since these communities have residents often dependent on bicycles).

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 Cerritos
- City of Cudahy
- City of Downey
- City of Glendale
- City of Huntington Park
- City of Maywood
- City of Paramount
- City of South Gate
- Burbank-Glendale-Pasadena Airport Authority

Chair

Ali Sajjad Taj
Council Member
City of Artesia

Vice-Chair

Sean Ashton
Councilmember
City of Downey

Secretary

Vrej Agajanian
Councilmember
City of Glendale

Treasurer

Jose R. Gonzalez
Mayor
City of Cudahy

Internal Auditor

Alejandra Cortez
Councilmember
City of Bell Gardens

Executive Director

Michael R. Kodama

General Counsel

Matthew T. Summers

Ex-Officio

William Rawlings
City Manager Representative

Page 4-550, 4.16.5.2 - Parklands and Community Facilities. There would be no danger of the increase and deterioration of existing recreational facilities if Metro were to provide additional recreational opportunities. Additional facilities on parking sites would be one option and is worth analyzing as a mitigation option.

Page 4-555 - Economic Fiscal Impacts. The Paramount and Bellflower MSF options do "not include the construction of recreational facilities or require the expansion of existing recreational facilities." This is inconsistent with Metro's message during public and community meetings where they showed a picture of the MSF in West Los Angeles/Culver City/Santa Monica that does have a recreational facility. A recreational buffer should be analyzed and included in the design plans for the project.

Page 4-557 - Economic Fiscal Impacts. A 0.25-mile and 0.50-mile area around the proposed station areas is insufficient as the area providing data for economic analysis. This limited geography is not a reliable way to analyze fiscal information and does not reflect the true economic conditions of the areas/cities affected by the project.

Page 4-559 - The local government agencies need revenue to support local services, like public safety, the cost of which will only increase for communities with stations. The impact of the 3% local share required by Metro puts an unfair burden on our environmental justice communities.

Page 4-559 - Economic Fiscal Impacts. Revitalization of underutilized or vacant parcels, encouragement of new housing near transit center, supporting pedestrians and bike facilities, and preserving or expanding of open spaces and recreation that is referred to in the environmental document in order to be realized, must be included in the design, environmental considerations and analysis, and used to identify new funding sources that are not solely transportation funding in nature.

Page 4-561 - Economic Fiscal Impacts. Direct local hiring to fill transit jobs and indirectly as transit workers spend their earnings can only be realized if Metro commits to these measures.

Page 4-563 - Economic Fiscal Impacts. The beneficial impacts to the regional economy will only happen if Metro commits to actions that analyze TOD development, economic opportunities and employment support in this environmental document.

Page 4-564 - Economic Fiscal Impacts. Business parking losses are expected. This is an impact that needs to be mitigated and is contrary to project goals. Additional parking, parking replacement spaces, and business retention and support strategies need to be analyzed and committed to in this environmental review.

Page 4-565, Table 4.17.5 - It seems that the General Fund Revenues should be higher in Alternative 1 and 2 than in Alternative 3 and 4 because of the access to Downtown Los Angeles and other regional destinations.

Page 4-566 - Economic Fiscal Impacts. Determining the magnitude of the business displacement impact by comparing the number of employees displaced to the total employment in the areas surrounding the proposed light rail line is an inadequate analysis of how businesses will be impacted by the project. Quantifying the number of businesses (and their employees) who will have their businesses and/or jobs eliminated needs to be included in the analysis.

Page 4-568 - Economic Fiscal Impacts. If the MSF is offering new jobs, then language about local hires needs to be considered and committed to in the environmental document.

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 Cerritos
- City of Cudahy
- City of Downey
- City of Glendale
- City of Huntington Park
- City of Maywood
- City of Paramount
- City of South Gate
- Burbank-Glendale-Pasadena Airport Authority

Chair

Ali Sajjad Taj
Council Member
City of Artesia

Vice-Chair

Sean Ashton
Councilmember
City of Downey

Secretary

Vrej Agajanian
Councilmember
City of Glendale

Treasurer

Jose R. Gonzalez
Mayor
City of Cudahy

Internal Auditor

Alejandra Cortez
Councilmember
City of Bell Gardens

Executive Director
Michael R. Kodama

General Counsel
Matthew T. Summers

Ex-Officio
William Rawlings
City Manager Representative

Page 4-571 – Safety and security is important for the entire line. A successful safety and security program must be a partnership between Metro, local jurisdictions, businesses and residents. Additionally, local municipalities shall be entitled to ongoing Metro funding to offset the added cost of police services that will generated by the station areas. As with other explanation of mitigations, the study refers to a Metro policy (920-924), but does not explain the policy nor provide a link to find it.

Page 4-631 - Economic Fiscal Impacts. Impacts to businesses during construction are more significant than can be addressed by the Community Outreach Plan. There is no discussion of developing programs that meet the businesses needs or mitigate losses after meeting with the owners. More is needed than marketing.

Page 4-853 - Environmental Justice. The threshold definition of an environmental justice community must include quantifications and impacts to the human health of residents and workers in the cities identified in the study corridor.

Page 4-853 - Environmental Justice. The cities of Maywood and Bell Gardens were not included in the Environmental Justice analysis and are not considered affected by the project. These cities were included in the Metro study corridor and need to be included in all aspects of environmental review and analysis including the category of Environmental Justice. Connections between these cities and stations in Huntington Park and Cudahy need to be analyzed and included in the design for the project. Excluding the cities of Maywood and Bell Gardens is a significant negative impact to two environmental justice communities.

Page 4-854 - Environmental Justice. Environmental Justice communities are also those communities exposed to greater numbers/amounts of toxic industry than other communities. Exposure to this type of industry and human health risks in general must be made a greater part of the environmental justice analysis in the document. Page 4-866, figure 4.22-4 – Maywood and Bell Gardens should be included on this map. They both have a significant low-income, minority population.

Page 4-869 - Environmental Justice / Noise and Vibrations / Transportation / Air Quality. Metro admits to unmitigated impacts, in addition to noise and vibration, in transportation and air quality. These need to be fully mitigated.

Page 4-871 - In South Gate, parking demand exceeds the amount of off-street parking provided by the project. This needs to be mitigated to that full parking is provided.

Page 4-873 - Environmental Justice. Permanent business displacement must be fully mitigated and not just financially compensated. Metro needs to work with the local cities to reduce these negative impacts.

Page 4-875 - Metro admits to unmitigated impacts in noise and vibration. These need to be fully mitigated.

Section 4(f) Evaluation

The protections afforded under the Section 4(f) evaluation have been in many cases underestimated or are in error. For example, Paramount High School is a publicly owned resource and functions as a recreational property for the community during off-school hours. While Paramount High School is listed as a Section 4(f) property, the off-school hours recreational function is completely ignored in the Appendix BB

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 Cerritos

City of Cudahy

City of Downey

City of Glendale

City of Huntington Park

City of Maywood

City of Paramount

City of South Gate

Burbank-Glendale-Pasadena
Airport Authority

Chair

Ali Sajjad Taj
Council Member
City of Artesia

Vice-Chair

Sean Ashton
Councilmember
City of Downey

Secretary

Vrej Agajanian
Councilmember
City of Glendale

Treasurer

Jose R. Gonzalez
Mayor
City of Cudahy

Internal Auditor

Alejandra Cortez
Councilmember
City of Bell Gardens

Executive Director
Michael R. Kodama

General Counsel
Matthew T. Summers

Ex-Officio
William Rawlings
City Manager Representative

analysis. Additionally, there are historic resources that are not acknowledged as needing protection under the analysis of this section.

The opportunity to leave these publicly owned assets in a better condition than prior to project has been ignored. For example, Salt Lake Park is listed as a property in need of protection under Section 4(f) yet the environmental analysis for the site states that the site will be left with insufficient parking (less than prior to the project construction and operation). Salt Lake Park is a good example of how an identified protected property can be left in a condition that benefits from the project. Increasing the parking for the park while providing new additional recreational facilities on top of the parking has not been evaluated. Such an improvement should be considered, analyzed and evaluated under this section.

Greater access to historic sites along the different alternatives has not been identified as possible greater benefit under Section 4(f). For example, easier accessibility to El Pueblo De Los Angeles State and Historic Monument from the

The Gateway Cities COG area could benefit from the state park through increased revenues and donations resulting from greater awareness of the historic resource. The analysis in Appendix BB is inadequate and the conclusions made in the DEIR/EIS as it relates to Section 4(f) are at best inaccurate and in many instances short sighted of the opportunities available to improve Section 4(f) properties.

Evaluation of Alternatives

Page 6-2 – How does the short line in Alternative 2 impact ridership? How does it impact the ability to compare ridership on Alternative 1 versus Alternative 2? While it costs \$100 million more as part of Alternative 2, how would it change ridership if a short line was also proposed as part of Alternative 1?

Page 6-6 – Eco-Rapid Transit believes that there should be greater economic and community benefits for the entire line if the line goes to Downtown Los Angeles (Alternative 1 and 2) rather than stopping at Slauson (Alternative 3). Please explain your statement.

Page 6-13 – Does Metro have a more detailed explanation and a list of community groups opposed and those in favor of the Little Tokyo station? Eco-Rapid Transit has heard from a number of groups within Little Tokyo in support of the station.

General Alternatives Comment – For Alternative 1, Design Option 2, Little Tokyo is by far the primary transit ridership station. It is the station that would be used to not only access Little Tokyo, but also the Government Center in Downtown Los Angeles. Without this station riders have to transfer to Dow and destinations along the Gold Line going through East Los Angeles. This is one place that would require a below grade station. Cities and stakeholder groups have been working closely with Little Tokyo community members and the Industrial BID through this process (since 2009). Alternative 1, Design Option 2 should be chosen as the Locally Preferred Alternative.

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 Cerritos
- City of Cudahy
- City of Downey
- City of Glendale
- City of Huntington Park
- City of Maywood
- City of Paramount
- City of South Gate
- Burbank-Glendale-Pasadena Airport Authority

- Chair
- Ali Sajjad Taj
Council Member
City of Artesia

- Vice-Chair
- Sean Ashton
Councilmember
City of Downey

- Secretary
- Vrej Agajanian
Councilmember
City of Glendale

- Treasurer
- Jose R. Gonzalez
Mayor
City of Cudahy

- Internal Auditor
- Alejandra Cortez
Councilmember
City of Bell Gardens

- Executive Director
- Michael R. Kodama

- General Counsel
- Matthew T. Summers

- Ex-Officio
- William Rawlings
City Manager Representative

Public Outreach, Agency Consultation and Coordination

Page 7-12 – The City of Maywood is also part of the Gateway Cities City Manager TAC and has attended their meetings.

Page 7-19 – Eco-Rapid Transit would like to see the Downtown Los Angeles survey, survey methodology and be provided more qualitative and quantitative analysis. An appropriate survey should include information related to population, sample size, sample design, data collection and potential sampling error. It should minimize sampling error and present data with a minimum of potential biases.

Areas of Concern

Many of our cities have the highest densities in the region. For example, Cudahy’s density per acre is nationally second, only to Manhattan, Huntington Park is not far behind. All changes to the infrastructure impact their already taxed systems and facilities. The cities have reached their capacity to serve any additional increases in residences and demands on infrastructure. Any changes made by the project must address these local needs.

Eco-Rapid Transit is also concerned with safety and security of the entire WSAB project. It is important that Metro has detailed and clearly articulated plans to work with our cities and local law enforcement with the intention of eventually entering into an MOU with Metro so that there is an understanding of the roles and responsibilities. For example, this can include when someone calls 911 and crosses jurisdictional boundaries in the corridor. Metro needs to work with our cities to cover the additional policing costs anticipated with this project.

Eco-Rapid Transit believes that Alternative 1, Design Option 2 provides the best scenario for attracting state and federal funding as well as interest from the private sector. As with the Metro Purple Line, even if the WSAB is considered as a phased project, then the environmental analysis will already be certified and it makes the likelihood of future funding greater because the entire line is closer to shovel ready. Further, many funding eligibility requirements include the requirement for a certified environmental review and Record of Decision (ROD), not just inclusion in an environmental analysis document. Finally, it still allows for changes in the environmental document through an amendment or supplemental process.

Eco-Rapid Transit, Gateway Cities COG, Gateway Cities COG City Manager TAC, cities in the corridor and others have been working together with Metro to create a quality, energy efficient, sustainable, modern transit project within very difficult funding and cost constraints. We urge Metro to consider this as you review and address our comments.



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 Cerritos
- City of Cudahy
- City of Downey
- City of Glendale
- City of Huntington Park
- City of Maywood
- City of Paramount
- City of South Gate
- Burbank-Glendale-Pasadena Airport Authority

Chair

Ali Sajjad Taj
Council Member
City of Artesia

Vice-Chair

Sean Ashton
Councilmember
City of Downey

Secretary

Vrej Agajanian
Councilmember
City of Glendale

Treasurer

Jose R. Gonzalez
Mayor
City of Cudahy

Internal Auditor

Alejandra Cortez
Councilmember
City of Bell Gardens

Executive Director

Michael R. Kodama

General Counsel

Matthew T. Summers

Ex-Officio

William Rawlings
City Manager Representative

Eco-Rapid Transit acknowledges the efforts of Metro and its team and is in full support of the development of the West Santa Ana Branch light rail transit project, developed with appropriate mitigations and with a preference for the Artesia to Union Station alignment and a station in Little Tokyo (Alternative 1, Design Option 2).

We appreciate having an opportunity to comment on the Draft WSAB EIR EIS and will continue to work with staff on the design, construction and mitigation of this project. We look forward to riding on the West Santa Ana Branch light rail line. If you have any questions, you can contact our Executive Director, Michael Kodama at mkodama@eco-rapid.org.

Sincerely,

Ali Sajjad Taj
Chair, Eco-Rapid Transit

cc: Eco-Rapid Transit Board of Directors
Gateway Cities COG Council of Governments
Los Angeles County Metropolitan Transportation Authority Board of Directors