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1 NOW, THEREFORE, the Culver City Redevelopment Agency DOES
2 HEREBY RESOLVE as follows

3 1 This Resolution including attached Exhibit A, constitutes the Agency s
4 official comments on the Final EIS/EIR that was prepared for the proposed Mid-City
5 Exposition Light Rail Transit Project

6 2 Staff is directed to transmit this Resolution to the Los Angeles County
7 Metropolitan Transportation Authority for consideration by the Metro Board
8

9
10 APPROVED and ADOPTED this 21st day of November, 2005
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12

13 _____
14 ALAN CORLIN, Chair
15 Culver City Redevelopment Agency

16 ATTEST

17 APPROVED AS TO FORM

18 _____
19 VIDA FLOYD, Agency Secretary

20 _____
21 MURRAY O KANE, Agency Legal Counsel
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Exhibit A

CULVER CITY REDEVELOPMENT AGENCY RESOLUTION NO 2005- RA____

FINAL EIR/EIS (the "FEIR") COMMENTS MID-CITY/EXPOSITION LIGHT RAIL TRANSIT PROJECT November 21, 2005

General Comments

- 1 Revised LPA (Executive Summary Table S-2 Capital Cost Estimate for Mid-City/Exposition LRT, Page 39) The last column shows costs for the Revised LPA (Metro Staff Recommendation) This revised LPA is described in Note b in the Table The Revised LPA should be more fully described and illustrated, perhaps with a complete separate section This is particularly important to Culver City as the Revised LPA incorporates a Venice/Robertson station design option that is proposed to address concerns expressed by Culver City with at grade crossings of National Boulevard and Washington Boulevard An illustration or series of illustrations depicting the Revised LPA are necessary
- 2 Venice/Robertson Interim Station Design Options (Page 55) The third paragraph identifies the north of right of way options and the On ROW Design Option This option is elsewhere identified as the only option that would be affordable within the approved project budget and the option incorporated into the Revised LPA This description should include such references
- 3 Elevated Venice/Robertson Station Option Design and construction of a truncated version of the elevated Venice/Robertson station to terminate south of Washington Blvd with an elevated crossover over National Blvd yields benefits on the following issues
 - a Does not require right-of-way acquisition
 - b Allows for full redevelopment of existing private property
 - c Provides for bike path to extend past Wesley crossing under the elevated track crossing National Blvd at the signalized intersection at Wesley and proceed along National Blvd on existing sidewalk to station and the Venice Blvd bike lane
 - d Eliminates need to provide for a gated pedestrian crossing of the LRT tracks

- e May provide for selected dedicated parking below and adjacent to the elevated rail north of Wesley
 - f Eliminates one pedestrian roadway crossing from proposed parking lot on Metro right-of-way north of Washington Blvd , present location of The Jungle nursery
 - g Will provide a site for the CMC and possibly the electrical control building under the raised platform/station
 - h Self advertises therefore less roadside directional signage needed
 - i Noise generated by the station activity and the adjacent crossover track will be at a further distance from residences
 - j Pg 4 17-8 states ' the aerial station may be considered environmentally superior to the ROW option
- 4 Page 2 4 – 31 There is a Control Office Building at the Venice/ Robertson Station (see Appendix A, Sheet A-402) The facility is dedicated to regulate/control/monitor power to the LRT system In addition there is a Traction Power Substation (Page 4 15-7, and Appendix A, Sheet A-404) proposed on the portion of the LRT right-of-way, located between Washington and National Boulevards None of the Venice/Robertson Design Options ever discuss where these two facilities would be placed or how they will be designed and situated so as to not generate any adverse impacts
- 5 Page 2 4-43 Figure 2 4-30, Venice/Robertson Station Area This Figure indicates that a left-turn is proposed from the southerly end of the Bus Drop-Off/Layover' to eastbound Washington Boulevard According to the plans for the Station in the Executive Summary Pages 68 and 69, only a right-turn would be allowed The right-turn only movement is supported by Drawing A-404 in Attachment A While this issue is related to the LPA, which Metro Staff is proposing to be revised it should be noted that the City of Culver City would not allow such a left-turn movement from any future Transit Center and potentially any parking lot, due to limited queuing space from the Washington/National intersection

Air Quality Issues

- 1 We would note that transit is generally considered an air quality positive strategy in a regional sense Any impacts are therefore either local near a particular transit node, or short-term during construction The environmental analysis concluded that carbon monoxide, as an indicator of any local 'hot spot' potential, was less-than-significant Based upon the

continued improvement of the regional vehicle fleet, we would concur with that assessment

Since the Draft EIR/EIS was released in 2001, there is a substantial gap between the preparation of the DEIR/DEIS and the final documents. A limited amount of updating is included in the FEIR/FEIS, but even these updates stop around 2003. There are several new air quality initiatives or programs that have been promulgated in the last few years.

Those technical issues that are not adequately addressed in the final environmental documents (because of the passage of time or an initial de-emphasis) include the following:

- a. The analysis provides no meaningful analysis of air toxics issues associated with idling buses at transit centers or of delayed surface trucks along priority bus or LRT corridors.
- b. The analysis does not include any information on the air quality setting since 2002. The basin has experienced some back-sliding in the last few years that are a major concern in long-term ozone attainment strategies.
- c. The analysis does not include the concept of local significance thresholds developed by the SCAQMD which are generally more stringent than the regional significance thresholds from the 1993 SCAQMD CEQA Air Quality Handbook.
- d. The FEIR/FEIS contains no reference to recently adopted California 8-hour ozone air quality standard that is more stringent than the federal standard.

Land Use Issues

1. Culver City Redevelopment Agency Redevelopment Plan and DFD (Page 4 1-10). This section makes no reference to the DESIGN FOR DEVELOPMENT FOR EXPOSITION LIGHT RAIL TRANSIT AND STATION AREA (the DFD) approved by the Culver City Redevelopment Agency on June 6, 2005. The DFD states in part, the following:

Consistent with the purposes of this DFD and pursuant to the authority of the Agency under Section 422 of the Redevelopment Plan for the Culver City Redevelopment Project (Component Area 3) and Section 363 of Component Area 4, the Agency hereby establishes the following controls and restrictions for development of the Exposition Light Rail Transit

and Station Area DFD, which are in addition to applicable General Plan requirements and guidelines, Zoning, Building Codes and other requirements of the Culver City Municipal Code (CCMC)

- 2 Venice/Robertson Design Options (Page 4 1-18 to 4 1-19) This discussion should reference the DESIGN FOR DEVELOPMENT FOR EXPOSITION LIGHT RAIL TRANSIT AND STATION AREA" (the DFD) approved by the Culver City Redevelopment Agency on June 6, 2005 The design options that are incorporated into the LPA and the Revised LPA respectively should be identified
- 3 CEQA Determination (Page 4 1 -19 to 4 1-20) This analysis of applicable land use policies does not include reference to the "DESIGN FOR DEVELOPMENT FOR EXPOSITION LIGHT RAIL TRANSIT AND STATION AREA (the DFD) approved by the Culver City Redevelopment Agency on June 6, 2005 This section also does not include discussion of the Revised LPA" and associated impacts
- 4 Land Acquisition (4 2 2 1 Acquisition of Property, Table 4 2-2, Page 4 2-5 and Page 4 2-30) This paragraph references land acquisition requirements for the LPA and for the three North of ROW Options It also mentions that ROW and Aerial Station options would not require the acquisition of properties However on Table 4 2-2, Page 4 2-5, under the West End section, it shows partial (P) takings listed for the Aerial and in ROW options Which is correct?
- 5 Financial Analysis (Venice/Robertson Station Design Options, Page 5 1-6) The Metro Staff recommended Revised LPA incorporates the station location option east of National Boulevard on the Metro right of way near Wesley Street which is identified as the only option that would be affordable within the approved project budget Please indicate whether the certification of this EIS/EIR will encompass the Revised LPA?
- 6 Response to Comments (Page 7-131 to 7-133) Several paragraphs on these pages discuss the Culver City General Plan and land use/transportation policies Not addressed in this discussion is the "DESIGN FOR DEVELOPMENT FOR EXPOSITION LIGHT RAIL TRANSIT AND STATION AREA" (the DFD) approved by the Culver City Redevelopment Agency on June 6, 2005

Public Safety Issues

- 1 These comments are common to both possible locations, Venice / Robertson and the interim termination at Wesley Street The Expo Rail

Project will cause an overall increase in calls for police and fire service, including

- a An increase in criminal activity will occur in Culver City Adjacent parking areas will see an increase in auto theft, auto burglaries, and thefts from autos Increased pedestrians coming to and from the location will increase the amount of violent crime including robbery assaults, purse-snatches, etc If parking areas for the route are within our jurisdiction, the reportable crime and the police department s workload would likely increase
- b Pedestrian and vehicle safety should be the highest priority Elevating the railway will reduce the incidence of vehicle & pedestrian collisions with the train
- c Trains are a major terrorism target The police department will be responsible for safety and criminal activity within the City limits The City will have to take proactive steps whenever terror alerts are given Culver City Police does not have the personnel to handle this at our present capacity
- d The police department is responsible for the safety of all persons within the City not just residents The police department estimates that on any given day 325,000 persons are within our jurisdiction, not the 39,119 as indicated on page 4 12-3 This is our policing population which will likely increase
- e The department will have to increase their personnel capacity to accommodate the needs of this project, including stationary security posts at the station s end, and while citizens come and go to the station
- f Several public and private schools will be impacted in the project Not mentioned in the report are Culver City High School Farragut Elementary School Linwood Howe Elementary School Willows Community School Hamilton High School Turning Point School and Echo Horizon School In addition there are two new schools currently entitled and/or in the process of entitlement (New Century School off of Landmark and the proposed Expansion of Turning Point School off of National and Landmark)
- g Regardless of which location is chosen, adequate parking will be an issue By definition, this will be the western terminus of the rail project, thus drawing riders from the entire west side Inadequate parking will impact adjacent residential neighborhoods and traffic

congestion will increase Increased traffic will cause a corresponding increase in calls for service, including injury traffic collisions

2 Should the route terminate at Venice / Robertson, with planned parking north of Venice in the City of Los Angeles

- a An elevated train can be designed to minimize the affect of crossing Washington, and reduce the incidences of vehicle-pedestrian/train collisions
- b If parking is planned north of Venice, the reportable crime will be the responsibility of the City of Los Angeles
- c Pedestrians hurrying to catch a train across Venice are a safety issue
- d Some incidents will become Culver City Police responsibility, as determined by jurisdictional boundaries
- e At grade crossing will have a major impact on police and fire response times on Washington Blvd & National, which are major arteries through Culver City
- f A concurrent project is in the planning for redirecting Washington Blvd at Culver, via Ince This is a couple of blocks west of the planned route Adding a ground level crossing will promote gridlock during train crossings, with no immediate alternate routes Police and fire vehicles could become 'trapped' during a crossing, delaying or preventing an adequate response to routine and emergency calls
- g The area is a mix of industrial and residential Truck deliveries will be impacted The potential of trucks carrying hazardous materials becoming involved in collisions will increase This area has the designated truck routes of Venice and National that feed the affected area In the past decade the area has been expanding and changing from industrial and manufacturing to corporate offices, design centers and business

3 Should the route terminate at Wesley

- a Parking north of Venice will accommodate the needed spaces, however, the riders will traverse over one-quarter mile to catch the

train The safety of these riders would then shift to our responsibility, dramatically increasing our workload

- b Mitigation measures such as high fences will deny access to McManus Park from the south side of the route

Transit Issues

- 1 Page 3 1 – 3 though Pg 3 1 – 9 There is a potential for a large congregation of transit buses to arrive on-site because of the Venice/Robertson station being a proposed Transit Center There is no discussion of where the buses will stop if multiple arrivals overlap and over flow issues arise Will there be sufficient queuing area along Venice Boulevard out of the traffic lanes to accommodate buses waiting to access the Center, See Figure 2 4 – 15 Bus Feeder Network
- 2 Page 2 4-15 Last Paragraph It is noted here that there is a railroad spur located in the Hayden Tract and that Metro would maintain and plan the parcels within the Hayden Tract Spur for local transportation use There is no information provided to explain what is implied by local transportation use
- 3 Executive Summary (p 68) The station area plan indicates that buses enter from Venice Boulevard and can only exit onto Washington Boulevard by turning right (westbound) This is inconsistent with the station area plan shown on Figure 2 4-30 on p 2 4-43
- 4 Locally Preferred Alternative (Figure 2 4-15 on p 2 4-8) The figure depicts Culver CityBus Lines 1 4, and 5 as modified to connect to Venice/Robertson and La Cienega stations Culver CityBus does not currently have plans to reroute these bus lines as according to the figure, and Culver CityBus Line 1 is the only existing service that will directly serve the Venice/Robertson station area
- 5 Stations (Figure 2 4-30 on p 2 4-43)
 - a The station area plan indicates Culver CityBus lines 4 and 5 as serving the station area on Washington Boulevard, but Culver CityBus line 5 does not directly serve the station area In addition, Culver CityBus line 4 is undergoing service route change (to be approved by City Council and, if approved, implemented Jan 9, 2006) and the new route will no longer pass by the station area The new Line 4, once approved, will continue going north on Jefferson Boulevard from the intersection of Jefferson Boulevard and Duquesne Avenue and it will run on La Cienega Boulevard to

eventually connect to West LA Transit Center It will directly serve La Cienega Station and will connect the station with West L A College and Fox Hills Mall

- b The segment of National Boulevard that extends from the Right of Way immediately west of Wesley Street to Washington/National intersection is not available for a bike path given that National Boulevard does not have a sidewalk In addition, the land (on the southeast corner of the Washington/National intersection) proposed to be acquired to accommodate the widening of National Boulevard as indicated by the Locally Preferred Alternative is currently in escrow
- c The station area plan shows that buses entering into the transit center from Venice Boulevard can either make a left (going eastbound) or a right (going westbound) on Washington Boulevard This is inconsistent with the station area plan shown in the Executive Summary, p 68 The FEIR should be revised to reflect which of these is correct The proximity of the bus exit to the Washington/National intersection will make it extremely difficult for buses to make a left turn to go eastbound on Washington Boulevard, assuming that Culver City's traffic engineer will even allow for such maneuver Furthermore, the turning angle/radius for buses making right turns on Washington Boulevard will be problematic buses making right turns will encroach upon the left turn lane on the north bound direction of Washington Boulevard
- d Due to the geometry and street configuration of the proposed station areas (all options), existing heavy traffic in the station vicinity, and the proximity of transit center entrance and exit to intersections, it is impractical, from the point of view of bus operations, to have buses leave the streets and enter the off-street transit center to pick up passengers Doing so would significantly decrease the efficiency of bus operations and further exacerbates the traffic situation in the station vicinity when buses loop around to get back to their original operating directions on Venice or Washington Boulevards Furthermore the proposed parking lots that are within reasonable walking distance of the recommended revised LPA (ROW option) only contain 110 parking spaces (located on the right-of-way between Venice and National Boulevards), which is significantly lower than year 2010's demand of 600 spaces It is therefore recommended that off-street transit center be replaced by on-street transit centers on Venice and Washington Boulevards and that the proposed space for off-street transit center is used to create more parking spaces that provide more park-and-ride transit users better access to the interim station Without this additional parking we do not feel the

proposed parking layout are adequate or in close proximity to the interim design options

- e Pedestrian path is not clearly identified in the station area plan To ensure the safety of pedestrians and passengers, safe and direct pedestrian routes with good signage and lightings must be provided

6 Bus Service

- a The FEIR does not address the impact Exposition LRT will have on existing transit services Culver CityBus Lines 1 and 4 will be heavily impacted by Exposition LRT due to their proximity to the Venice/Robertson and La Cienega stations, while Culver CityBus Lines 2 3, 5, and 6 will be impacted to some degree The potential impact of necessary service increase to accommodate bus riders brought in by Exposition LRT will require additional funding to mitigate (pp 3 1-1 to 3 1-9)
- b The FEIR anticipates that Culver CityBus will implement changes to its bus services to serve the LRT stations These anticipated changes include improved headway on Culver CityBus Lines 4 and 5, as well as terminating Culver CityBus Lines 1, 4 and 5 at La Cienega Blvd or Venice/Robertson station These anticipated changes are not included in the Culver City's Short Range Transit Plan, and Culver CityBus does not currently have plans or funding to implement these changes as anticipated in the FEIR Additional funding would be required to implement change in service route and frequency The FEIR should evaluate the feasibility and funding source of these bus transit improvements (pp 3 1-4 to 3 1-8)
- c The FEIR does not explain why the daily fixed guideway boarding for the Forecast Year 2025 is lower than that for the Forecast Year 2020 (42 900 and 43,600 respectively) (Table 3 1-8 on page 3 1-7)
- d The FEIR does not explain the rationale for quadrupling the bus frequency for Culver CityBus Line 5 as this line is currently the least used line in Culver CityBus system (Table 3 1-9 on page 3 1-7 to 3 1-8)
- e Under Venice/Robertson Station section, Santa Monica BigBlue Bus 12's peak headway (under No Project scenario) is 10 min, not 30 min as reported in the FEIR
- f Under Venice/Robertson Station section, the subtotal of frequency (for bus lines Metro 33 to Culver City 5) under 'No Project' scenario and the subtotal of frequency (for the same set of bus lines) under

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'With Project' scenario are incorrect. The grand total for both sets of bus frequencies are also incorrect.

- g Under La Cienega Station section, Culver CityBus Lines 1 and 4 are listed twice in the table
 - h Under La Cienega Station section, the subtotal for the bus frequencies (for bus lines Metro 68 to Culver City 5) and the grand total of bus frequencies under "No Project" scenario are incorrect
- 7 Bus Operation and Maintenance (O&M) Costs Table 5 1-6 on page 5 1-9 and Table 5 1-7 on page 5 1-10 indicate that the operating cost per vehicle-hour for Culver City Municipal Bus is \$81 79 in 2005 dollars. Culver CityBus current operating cost per vehicle-hour is \$100 46. This would significantly shift the range of incremental annual bus O&M cost for Culver CityBus to higher than the range of \$1 1 to \$10 7 million dollars as indicated in Table 5 1-7. Funding assistance is required to accommodate the additional O&M costs associated with serving Exposition LRT stations. The FEIR should evaluate the feasibility and funding source for the assumed bus service improvements.
- 8 Ridership The FEIR indicates that the LRT Build Alternative will consolidate the West Los Angeles Transit Center at the planned La Cienega and Venice/Robertson LRT stations. The area where La Cienega station is located is heavily congested. In order to expedite bus service, it is necessary to have road improvements in this area, such as adding exclusive bus lanes on La Cienega Boulevard. Furthermore, if bus lines are to be re-routed to terminate at either Venice/Robertson or La Cienega stations, amenities (such as restrooms and vending machines) for bus drivers must be provided at both stations. (Page 5 2-2)
- 9 Bus Service The recommended future Locally Preferred Alternative station area (ROW option stopping short of National) does not accommodate any fixed route transit services. Culver City, Santa Monica and MTA buses will indirectly serve the station. The closest bus stops are on Washington Boulevard at National (CC Lines 1 and 4). The closest MTA bus stops are on Venice Boulevard. It does not appear that the MTA will reroute buses to the station. Since the MTA is the regional transit provider, it will be difficult to attract and transfer riders from the surrounding communities to the LRT line without direct bus service to the station. Similarly, there is no discussion regarding Santa Monica Bus Line services (SMBL). What SMBL routes does the MTA expect to serve the station and where will they stop? Would the SMBL Line 10 Freeway Express leave the freeway and divert to the station?

Traffic Issues

- 1 Executive Summary, Pages 34-36 Regarding Jefferson Boulevard Design Options, Option B provides a grade separation bridge over La Cienega Boulevard that ends short of Ballona Creek. The LRT tracks cross Jefferson Boulevard at-grade. Option B requires an awkward connection for eastbound bicyclists who cross Ballona Creek in the Class I bike path, and then need to cross Jefferson Boulevard to reach the Class II bike lane. The crossing location for bicyclists shown in the Site Plan for Option B would pose a safety concern due to potential conflicts with eastbound motorists on Jefferson Boulevard who are negotiating a right-hand horizontal curve. The Medium Bridge Design Option carries the grade separation over Ballona Creek and the National Boulevard/Jefferson Boulevard intersection. This provides for smoother traffic flow and a safer connection between the Class I bike path and Class II bike lanes. For this reason, the Medium Bridge Design Option serves Culver City better than Option B.
- 2 Executive Summary Table S-4, Page S-2, and Page 3 2-12, Mitigation Measure T2. We support Metro's contribution of \$100,000 toward the preparation of a study identifying the possible improvements and reconfiguration of freeway ramps and connecting arterial streets to help mitigate the impacts of a parking facility at Venice/Robertson station. However, the actual construction of improvements would be the mitigation of any of the impacts. Therefore, the proposed mitigation measure should include the stipulation that above and beyond Metro's financial participation as the regional transportation agency in any regionally significant traffic improvement, Metro should also fund their proportional share of any improvements to address any impacts of the proposed Mid-City Exposition Light Rails Project.
- 3 Executive Summary Table S-4 Page S-6 Table S-4, and Page 3 2-62 Mitigation Measure T16. The improvements listed in the Executive Summary for T16 are not the same improvements listed on Page 3 2-62. Metro must provide an accurate and complete listing of mitigation measures before certification of the Final EIR.
- 4 Executive Summary, Table S-4, Page S-6 Mitigation Measure T19. It is not clear from the discussion where the additional right-of-way required to accommodate the proposed southbound right turn lane between Venice Boulevard and Washington Boulevard will come from. The Final EIR must identify where the additional right-of-way will be obtained. The City of Culver City disagrees with the notion that providing additional lanes on Washington Boulevard will mitigate the impacts of an at-grade crossing. Traffic at the intersection of Washington and National Boulevards will be

stopped in all directions when a Light Rail Vehicle (LRV) is approaching and/or leaving the station regardless of whether the additional lanes are installed. However, the installation of these additional lanes may help to mitigate the impacts caused by increased LRT station related traffic.

- 5 Executive Summary Table S-4, Page S-10 Mitigation Measure T20 This mitigation measure, which would essentially convert the westbound right-turn lane on Washington Boulevard into a through-and-right lane, appears to be sufficient to mitigate the impacts of LRT for all Venice/Robertson Design Options, but not the LPA at-grade crossing.
- 6 Page 2 4-63, Countdown Pedestrian Crossing Traffic Signals The Final EIR states that installation of countdown pedestrian signals is encouraged for the intersection of Venice and Robertson Boulevards. Countdown signals should be required at all adjacent intersections serving the Venice Robertson Station, transit stops and parking lots, such as Venice/National and Washington/National intersections. The countdown signals should also be installed at the Washington/National intersection in the event an east of National Boulevard Venice/Robertson Design Option is selected.
- 7 Page 3 2-41, Section 3 2 4 2 1 Impact on Intersection Level of Service The Final EIR does not discuss the potential impacts to intersection operations from the potential surge of pedestrians leaving or arriving at the station, especially at rush hour. Such pedestrian surges could have a negative impact on traffic movements and signal timing at the major intersections. As stated previously, City Staff and consultants have had follow-up discussions with Metro Staff. Metro Staff has stated that they do not expect that there would be unusually high pedestrian crossing volumes at Venice Boulevard. Due to the elongated configuration of the proposed station parking to be located along the Metro-owned ROW north/west of Venice Boulevard, Metro anticipated that pedestrian crossings of Venice Boulevard would be dispersed between crossings at Bagley/Main, Culver/Venice and Venice/Robertson during the peak travel hour. It should be noted that any pedestrian choosing to cross at Bagley/Main/Venice intersection would double their walking distance. Crossing at Culver/Venice would also increase the walking distance but to a lesser degree. The shortest direct route would be to cross at the Venice/Robertson intersection. As such, Culver City Staff believe that most pedestrians parking in the main lot north of Venice will cross at the Venice/Culver intersection and if surges of pedestrians do occur there is the potential for negative traffic impacts.

City Staff is also concerned that in the event an east of National Boulevard Venice/Robertson Design Option is implemented, the intersection of Washington/National could be negatively impacted by such pedestrian

surges Metro Staff has advised the City that a detailed level of analysis would occur during the final design phase of the project when specific parking lot locations and access points are finalized. Providing adequate pedestrian crossing times would be developed in coordination with Culver City and Los Angeles. However, the Final EIR does not include a mitigation measure to require that such study be prepared and any recommendations implemented. Therefore, City Staff recommends that a mitigation measure be adopted that requires preparation of a detailed analysis during the final design phase of the project when specific parking lot locations and access points are finalized, in order to identify signal timing, adequate pedestrian crossing times and identify any required physical mitigation measures. Such analysis and subsequent mitigation measures should be funded and implemented by Metro in coordination with and subject to the approval of the Cities of Culver City and Los Angeles.

- 8 Page 3 2-63, Mitigation Measures T17 through T21. These mitigation measures should be revised to specifically state that the design and physical improvements shall be reviewed and approved and completed construction accepted by the City of Culver City prior to the beginning of transit service to the Venice/Robertson Station.
- 9 Page 3 2-66. The Final EIR acknowledges that implementation of the Locally Preferred Alternative with at-grade crossings of Washington and National Boulevards would reduce reliability of the LRVs.
- 10 Page 3 2-69, Mitigation Measure T22. The mitigation measure should be revised to state that the mitigation of project impacts should be implemented within a reasonable and timely period. The mitigation measure should be revised to state that analysis of impacts and implementation of required mitigation shall be accomplished within 180 days from the opening day of the Venice/Robertson Station. The mitigation measure should also be revised to specifically state that the design and physical improvements shall be reviewed and approved and completed construction accepted by the City of Culver City prior to the beginning of transit service to the Venice/Robertson Station.
- 11 Impact on Regional Travel Patterns (Page 3 2-7). It is unclear how the regional benefits of the project will be achieved. The FEIR lacks specificity with regard to patronage and how it will be achieved. There is no discussion with regard to how many passengers are expected to drive, kiss and ride or take the bus. Where are the passengers coming from? This information is critical to station area planning and for that matter all of the access routes leading to the station.

- 12 Kiss-and-Ride How will kiss-and-ride passengers be accommodated? Will they be dropped off on Washington Boulevard? If so, where? What pedestrian improvements will be provided for kiss-and-ride patrons and pedestrians in general?

Parking Issues

- 1 Executive Summary Page 36, regarding La Cienega Station Parking Options, the City of Culver City opposes the No Parking Option , which if implemented would potentially shift parking demand west into Culver City This potential option and related impacts are not discussed in the parking impact assessment (3 3 2, Pg 3 3-6)
- 2 Execution Summary, Table S-4, Pages S-11 through S-13, Proposed Mitigation Measure P5 The Table acknowledges the potential for parking spillover and intrusion into residential areas There is no detailed discussion about what type of parking control will be employed to insure who is using the parking facilities and how much parking is available on a real time basis to be conveyed to patrons There is no detailed plan for how spillover/intrusion impacts will be mitigated and who will bear the cost of implementing and maintaining any required mitigations The potential problems seem to be left to the City to resolve if they arise Typical mitigation measures cost the City and individual residents on ongoing bases The proposed Mitigation Measure P5, should specifically state that Metro shall be responsible for paying for installation and maintenance of project relate mitigations
- 3 Page 3 3-1, Table 3 3-1 Loss of Off-Street West End According to this table, 144 Off-street parking spaces will be eliminated as a result of the project As stated in the Final EIR this loss "could and more likely would increase demand for on-street parking in the area, including adjacent commercial and residential areas The loss of these spaces and the potential increased competition for on-street parking in the area of the Venice/Robertson Station (i e , Exposition Boulevard) would force cars of local employees and customers, and some transit riders, to seek parking in the adjacent residential areas In order to address these potential impacts, Mitigation Measure P1, must be revised to include station *with* parking facilities to determine if spillover impacts are occurring and specific language that Metro shall be responsible for funding implementation, ongoing operation and enforcement of parking programs to reduce impacts on adjacent streets
- 4 Page 3 3-9 and 11, Section 3 3 2 3 Addition of Station Area Parking The Final EIR notes in the LPA and Venice/Robertson Design Option, if parking demand exceeds supply at the Venice/Robertson station, it can be increased by extending the number of spaces within the METRO's ROW

at the Venice Robertson site This parking does not allow direct or convenient access for pedestrians between the station and any of the proposed parking lots The spaces located north of Venice Boulevard are about a quarter to a third of a mile away depending on where the station is constructed Not only does this exceed the maximum recognized distance people will walk from a parking space to a destination, but represents a walking time of nearly ten minutes With 5 minute LRV headways it is conceivable a passenger could park their car and not board a train for 15 minutes Assuming an average travel speed of about 25 miles per hour, the 9.6 mile trip to downtown Los Angeles on the Expo line would be about 23 minutes Travel time is one of the most critical factors in mode choice This includes the time to drive to a station, transfer, travel and then transfer at the work end The transfer/travel times starting at the Culver City end are not a very attractive alternative to driving The majority of the station parking must be located closer to the station location If any of the Venice/Robertson Design Options are selected and the station is located east of National Boulevard, it is recommended that proposed off-street transit center be replaced by on-street transit centers (on Washington and Venice Boulevards) and that the proposed space for off-street transit center be used to create more parking spaces that provide more park-and-ride transit users better access to the interim station

- 5 Page 3 3-10, 1st Paragraph The Final EIR recommended in this paragraph that on-street parking restrictions be installed along adjacent streets to discourage parking by transit riders There is no detailed discussion about what type of parking control should be employed to insure who is using the parking spaces There is no detailed plan for how the impacts will be mitigated and who will bear the cost of implementing and maintaining any required restrictions The potential problems seem to be left to the City to resolve if they arise Typical mitigation measures cost the City on ongoing bases The proposed Mitigation Measure P1, should specifically state that Metro shall be responsible for paying for installation and maintenance of project related parking restrictions
- 6 Page 3 3-10 and 11, Mitigation Measures P1 and P5 Other than the statement in P5 after opening day neither mitigation measure states specifically when analyses of impacts/parking demand and implementation of mitigations shall occur The mitigation of project impacts should be reasonable and timely The mitigation measures should be revised to state that analysis of impacts and implementation of required mitigations, subject to City of Culver City approval, shall be accomplished within 120 days from the opening day of the Venice/Robertson Station

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- 7 Page 3 3-13, Venice/Robertson Design Option States that a parking shuttle system would be required However, the Final EIR does not include a mitigation measure for the implementation and ongoing operation and maintenance of a shuttle system In addition, the Final EIR further states that even with a shuttle system operating, parking spillover into east Culver City streets will occur While the discussion notes that Mitigation Measure P1 would be necessary to reduce the potential impacts P1 does not include station with parking facilities and there is no discussion of who would be responsible for the ongoing operation and maintenance of a shuttle system and operation and enforcement of parking programs to reduce impacts on adjacent streets Mitigation Measure P1, must be revised to include station with parking facilities to determine if spillover impacts are occurring and specific language that Metro shall be responsible for funding ongoing operation and maintenance of a shuttle system and operation and enforcement parking programs to reduce impacts on adjacent streets

Visual Quality Issues

- 1 Page 4 4-48, Mitigation Measure V15 The mitigation measure should be revised to state that lighting on the Transit Parkway shall be directed away from adjacent private property and designed to reduce spillover impacts

Noise and Vibration Issues

- 1 Absorptive sound walls Metro has indicated that based on the projected increase in noise levels for residences on the north side of National Boulevard and the amount of noise mitigation required at this location to meet Federal criteria, standard noise barriers (rather than absorptive walls) have been recommended Absorptive barrier walls are normally used to reduce the bounce that is often created when sound barriers bounce noise in the opposite direction thereby causing secondary noise impacts In the case of National Boulevard the sensitive residential receptors are exclusively located on the north side of the street and industrial or highway uses are located on the other side Metro indicated that no further benefit to the homes on the north side of the street would be provided by absorptive treatments on the wall and the noise created by National Boulevard itself seems to eliminate any benefit from the provision of absorptive treatments to the uses on the predominantly commercial uses on the south side of the street

It is true that absorptive soundwalls reduce the bounce of sound back toward the source This is why absorptive soundwalls are more effective at reducing noise from trains operating in close proximity to the soundwalls

The sound generated by the passing train is bounced between the reflective soundwall surface and the reflective side of the LRT vehicle, thus degrading the acoustic performance of the soundwall. An absorptive soundwall does not exhibit this degradation that results from an increase in virtual sound source height and a reverberant field build-up of train noise. Also, focusing on any residual benefit to the south-side commercial land uses regarding noise from National Boulevard misses the point. Because of the site geometry, with houses located north of the Exposition Line and National Boulevard, an acoustically absorptive soundwall could provide a beneficial project effect by reducing noise impact from National Boulevard traffic on these north-side residences. In addition to better reducing train pass-by noise, this beneficial effect would continue during periods of no trains.

- 2 Executive Summary Page 53, Last Paragraph This paragraph includes a statement that Special studies will be conducted as part of the Final Design to direct warning device noise away from sensitive receptors. Pages 4 6-32 through 34, list the noise and vibration mitigation measures, none of which relates to the above statement. A new mitigation measure should be added to a noise and vibration mitigation measure to prepare the special studies described on Page 53.
- 3 Page 2 4-15, 1st Paragraph The Final EIR description of the LPA West End states that landscape berms would face the ballasted LRT trackway so that these berms act as screening of the trackway from residential areas as well as acting as a sound buffer against LRT noise. Figure 2 4-13 Cross Section S Fay Street to Wesley Street (no page number), as well as the Partial Site Section West of Fay Avenue near Wesley Street on Executive Summary Page 43, indicate what appears to be a soundwall between the trackway and the landscape berm. According to Mitigation Measure NV1 on Page 4 6-32 last bullet, the soundwall is to be constructed on the north side of the ROW. The City is concerned that if a soundwall is installed as shown on Figure 2 4-13, the Bike Path area would be screened from view from National Boulevard. Lack of visibility of the Bike Path could result in low use and increased security concerns.
- 4 Noise and Vibration Chapter 4 6 needs to identify the exact location of Site V-4, where ground vibration was measured.
- 5 Page 4 6-3 last paragraph says that "monitoring results were 'generalized'. Please clarify what is meant by and what process was used to 'generalize' results.
- 6 Page 4 6-7 first paragraph Please define 'while gates are active', does this mean throughout entire pass-by while gates are down?

- 7 Page 4 6-7 Impact Criteria – Noise Criteria refers to Federal only, CEQA requires applicable state and local criteria be utilized as well Were state and local standards evaluated and applied as well?
- 8 Page 4 6-11 3rd Paragraph The reference maximum sound level of 77 dBA at 50 feet from track centerline (over soft ground) was used There is no statement whether this sound level is consistent with actual revenue operation measurements of similar trainsets operating on the Green Line and Gold Line branches It is our understanding, based on independent measurements (conducted by three different consultants and Metro), that the P2000 trains generally exhibit higher in-service noise emission than what their specifications promise Is the reference level of 77 dBA L_{max} consistent with the “in-service sound level measurements of P2000 trainsets operating on the other Metro lines? Also, most urban environments (including Culver City) have hard ground between the tracks and sensitive receptors yet the analysis assumed propagation over “soft ground” What correction factor was applied to the analysis to account for this discrepancy?
- 9 Page 4 6-11, 5th Paragraph In a recent decision involving the Gold Line grade crossing bells, the California Public Utility Commission (CPUC) has approved setting the bells to sound at a level of 75 dBA at a reference distance of 10 feet Will the project's proposed Audible Warning Devices be modified to reflect this CPUC decision?
- 10 Page 4 6-11 last paragraph and Page 4 6-12 first paragraph These sections are not consistent with earlier discussions regarding the duration of gate bells and again raises the issue of gate bell sound level
- 11 Page 4 6-12 3rd Paragraph The assumption that the 75 dBA quacker would be sounded provides an inadequate analysis if, in fact, the 85 dBA warning device will be regularly used The Final EIR does not provide analysis of the potential for the frequency of use of the 85 dBA warning device and/or how the project has been designed to reduce the likelihood of the louder warning device needing to be used
- 12 Page 4 6-14 last line from LRV should go after impacts
- 13 Page 4 6-16 third paragraph The correct technical term would be “damp as in *to reduce the amplitude and duration*, not ‘dampen as in *to make wet*”
- 14 Page 4 6-15 1st Paragraph Table 4 6-7 Summary of Residential Noise Impacts, states that 14 single family residences on the north side of National Boulevard between Fay and Helms Avenues would be impacted

- (10 Impact/4 Severe) from air-borne noise from LRVs Appendix J does not contain detailed maps showing where these noise (and vibration) impacts would occur along the alignment Metro must provide the detailed maps identifying the effected residences before final design of noise mitigation is approved
- 15 Page 4 6-18 1st Paragraph Based on previous experience with P2000 LRV both on aerial structure and at grade (viz , Green Line near Douglas Station and Gold Line through South Pasadena) the estimated barrier heights discussed in the FEIR are slightly low The aerial barriers should be 6 feet high from the viaduct surface and the at-grade soundwalls should be approximately 8 feet above grade It would be more accurate to specify soundwall heights referenced to top-of-rail There are no calculations provided for the proposed soundwall s acoustical performance Please provide the calculations A discussion of acoustically absorptive soundwalls is absent and should be provided
- 16 Page 4 6-19, Table 4 6-10 Regarding the Height (ft) column and the Notes in the table same comment as above regarding the height of proposed soundwalls One on-viaduct barrier is listed as 4 feet high, this would only be one to two feet above the source height and its performance would be questionable Please provide the calculations for the proposed soundwall s acoustical performance
- 17 Page 4 6-19, 2nd Paragraph It is asserted that barriers will reduce quacker noise by 8 dBA The Final EIR does not include any calculations for this Insertion Loss Please provide these calculations
- 18 Page 4 6-19 third paragraph We recommend that this paragraph be revised to reflect the recent order by the CPUC and the terms of the approved Gold Line Settlement Agreement regarding grade crossing bell noise levels and directivity
- 19 Page 4 6-21 third paragraph Please insert a reference to Table 4 6-12'
- 20 Page 4 6-23 Table 4 6-12 Last entry, ("489) Contents of the Table are not consistent with text on page 4 6-24 first paragraph
- 21 Page 4 6-24, 1st Paragraph Location 489 is identified as experiencing impacts However, unlike Locations 213 and 486, no proposed mitigation for Location 489 is presented Due to the proximity of residential, institutional and the identified recording studio uses to Location 489, a mitigation measure for the installation of spring-rail frog crossover switch must be adopted to address the potential impact

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- 22 Page 4 6-26, 8th Paragraph The vibration screening procedure in FTA, 1995 shows potential adverse effects for Category 1 uses at a distance of 450 feet and for Category 2 at 150 feet. These distances are known to be conservative and that is why the 'General' and "Detailed" methods are also available in FTA, 1995. However, the Final EIR states the threshold used for Category 1 uses is 100' instead of the FTA criteria of 450'. The difference between 450 feet and 100 feet in the Final EIR/EIS is not trivial. Thus, we would like to review the vibration calculations associated with the Hayden tract, the recording studio, and the row of residences (Category 2) that back up to the proposed track along National Boulevard in Culver City before final design and any mitigation is approved.
- 23 Page 4 6-27, "Vibration Attenuation Methods" While a comprehensive laundry list of available vibration reduction approaches is presented here in the EIS, none of the mitigation measures numbered 1 through 5 are provided in Culver City. Pursuant to NEPA, CEQA and court guidelines, the EIR/EIS must contain a reasoned prediction of the likelihood that a particular or any range of mitigation will be incorporated into the project. Discussion should be provided regarding the reasonableness and feasibility of incorporating various levels or types of vibration mitigation.
- 24 Page 4 6-28, Table 4 6-14 The table is not consistent with the discussion of vibration mitigation. It makes no reference to mitigation #6 nor lists any track location within Culver City. Also, notwithstanding Note /a/ in the table, the comment *supra* applies to the Vibration Attenuation Methods column in the table.
- 25 Page 4 6-28, Venice/Robertson Design Options There is no discussion about the potential impacts of the other options in this grouping if Option A is not selected. However, Mitigation Measure NV8 (Page 4 6-34), which appears to be proposed to address the Option A impacts, does not specifically state if the measure is contingent on any specific option being implemented. Therefore, Metro will be required to perform the noise and vibration assessment regardless of which design option is selected.
- 26 Page 4 6-28, Venice/Robertson Design Option According to this discussion, significant vibration and ground-borne noise impacts are projected for the recording studio located to the north of the right-of-way. The Final EIR states that the project shall be required to fully mitigate the impacts. However, Appendix J does not identify the specified recording studio as impacted.
- 27 Page 4 6-32, Mitigation Measure NV1 There has been some "relaxation" of the proposed mitigation measure between the DEIS and the FEIR/EIS as it relates to the proposed height of the sound wall along the northern

- boundary line of the right-of-way along Fay Avenue to Wesley Street The 2001 Draft EIS/EIR on page 3 9-20, (2nd bullet), stated that to be effective the at-grade walls must be 8 feet high' However, the Final EIR (NV1, 7th bullet) is now proposing this wall be six feet tall We believe this to be lower than adequate for at-grade soundwalls in this location The soundwalls should be increased in height to eight (8) feet
- 28 Page 4 6-35 Ground-borne Vibration Mitigation Measures' This paragraph does not, and should state that Mitigation Measure NV8 (Page 4 6-34) is required due to the potential for impacts to the recording studio on Wesley Street In addition, this paragraph should include discussion of the impacts to the recording studio discussed on Page 4 6-28, Venice/Robertson Design Options
- 29 Culver City recommends that Rubberized Asphalt Concrete (RAC), open-graded friction course (Quiet Pavement) should be used for the construction of the realignment of National Blvd that is required by the project and furthermore that the entire stretch of National Blvd between Jefferson and Washington that is not part of the reconstructed section of the roadway should be overlaid with a minimum of 2" of RAC RAC has a proven track record in reducing the noise levels on roadways by as much as 4 to 10 db This noise reduction would help offset the additional noise caused by LRT operations and would augment other proposed noise mitigation measures
- 30 Page 4 6-32, NV-1, last bullet Please provide barrier calculations for the soundwall between Fay Avenue and Wesley Street on the north side of R/W
- 31 Page 4 6-33 continuation of NV-2, first bullet Please describe in more detail the proposed or potential treatment(s)
- 32 Page 4 6-34 NV-7 Table 4 6-14 does not list Culver City locations
- 33 Pile driving vs drilling (Pg 4 15 – 25) C-22 Metro guidelines allow for pile driving 250 feet or more away from residences yet at p 4 15 – 13 the FEIR indicates that piles shall be drilled not driven Which is correct?
- 34 The City recommends that the pedestrian crossing over the LRT track at Wesley Street be eliminated in favor of a pedestrian path that will take residents around the west end of the station and connect to the proposed pedestrian/bike path north of the station at Wesley

Geology, Soils, and Seismicity

- 1 Page 4 7-2 Alquist-Priolo Fault Hazard Zones The text on this page erroneously states that the zone in the area of the project is located southeast of the intersection La Cienega and Washington Boulevards, when it is actually southwest of the intersection However, the text correctly states that the zone crosses the Exposition right-of-way in the area of National Boulevard and Fay Avenue In addition, Figure 4 7-2 on Page 4 7-4 also indicates that the zone crosses the right-of-way
- 2 Page 4 7-6 through 11 Any impact assessment and mitigation measure discussion of an aerial station should include the approach structures over Washington, National and Jefferson Boulevards and Ballona Creek

Water Resources

- 1 Page 4 9 3, Section 4 9 1 8 State Regulatory Framework The reference to the project size threshold for triggering coverage under the General Construction Storm Water Permit is based on outdated information The size threshold has been lowered from 5 acre and greater to 1 acre and greater The Final EIR erroneously states the outdated size threshold in various places in the document and should be revised appropriately
- 2 Page 4 9 3, Section 4 9 1 8 State Regulatory Framework The Final EIR does not discuss in this Section the General Industrial Activities Storm Water Permit (GIASP) requirements and their applicability to this project Due to the scope of the project, once in operation it is likely that it will be subject to the GIASP or an individual stormwater NPDES permit for its discharge of stormwater to the municipal storm drain system
- 3 Page 4 9-4 Maintenance of the Water Quality of Municipally Separate Storm Drainage Systems This Section should have reference the requirements in the LA MS4 Permit that specifically pertain to this project- ie for the construction and post-construction phases For example Under the Permit, City must ensure that the quality of the discharges entering its storm drain system, including those from construction site, meets the Maximum Extent Practicable (MEP) level by enforcing local Storm Water Pollution Prevention Plan requirements and by conducting inspections to verify the adequate implementation of Best Management Practices (BMPs) This section should also have reference the Standard Urban Stormwater Mitigation Plans (SUSMPs) which are a set of development planning requirements that apply to specific categories of development and redevelopment projects The SUSMPs requirements are aimed at controlling pollutants generated from developed or redeveloped sites after construction activities have been completed In

addition to the Waste Discharge Requirements (WDR) for Specified Discharges to Groundwater in the Santa Clara River and Los Angeles River Basins, the EIR should have specified a similar WDR for Ballona Creek if there is a reasonable expectation of similar discharge entering Ballona Creek Mitigation Measure WR1 should be amended to specifically state that Metro shall prepare all analysis and plans and implement all measures to comply with all relevant Federal State and Local stormwater regulations

- 4 Page 4 9-9 Page 4 16-9, Mitigation Measure OM3 states that A drainage plan shall be developed and implemented which shall ensure that the Division 11 facility is engineered to direct water runoff into appropriate drainage culverts and channels Mitigation Measure WR1 must be revised to include the same requirements to insure that if existing storm drain inlets/catch basins located in the vicinity of the project are inadequate to properly convey the runoff from the Exposition transit way additional catch basins should be constructed to prevent potential flooding The drainage plan shall be developed after careful consideration of the capacity of the existing storm drain system and the impact of the additional volume on the Ballona Creek and the Estuary The City of Culver City shall be consulted during the development of the drainage plan and the plan and recommended improvements shall be subject to the City's review and approval

Historical, Archaeological, and Paleontological Resources

- 1 Execution Summary Table S-4, Page S-48, Jefferson Boulevard Design Option The Ballona Creek Railroad bridge is identified as a historic landmark and is proposed to be left in-place and incorporated into the Project design However, The Final EIR does not include a mitigation measure to address who will be responsible for the ongoing maintenance

Construction Impacts

- 1 Page 4 15-5, 4 15 1 3 6 Bridge Construction Nighttime construction is anticipated to occur at La Cienega Station over street This has the potential to result in noise impact on Culver City residence Culver City and the East Culver City and Rancho Higuera Neighborhood representatives should be advised of anticipated nighttime construction periods and contact numbers
- 2 Page 4 15-10, Section 4 15 3 2 Parking, Mitigation Measure C5 – The City of Culver City shall be the only approval authority for on-street contractor employee parking within the City

- 3 Page 4 15 – 16, Mitigation Measure C42 Enforcement on construction sites in Culver City shall be by Culver City Police Department
- 4 Page 4 15-18, Venice/Robertson Design Option - The Aerial Station option would potentially require lane closures over National Boulevard, not just Washington Boulevard as stated in the Final EIR
- 5 Page 4 15 – 25, Impact pile driving According to Page 4 15 – 13, Mitigation Measure C22, Metro guidelines only allow pile installation by drilling Metro must clarify which technique for pile installation will be used before the Final EIR is certified
- 6 Level of Significance In the construction impact assessment section (p 4 15-8) the EIS/EIR states 'With implementation of mitigation measures itemized below, no substantial adverse construction impacts are anticipated However elsewhere in this section (e g , traffic at p 4 15-17) the document states Although the impacts would be temporary, they would be considered significant These sections of the document are inconsistent and should be revised to indicate whether construction impacts would be mitigated to a level of insignificance
- 7 Traffic In the discussion of traffic mitigation measures (p 4 15-9) the document indicates that Metro is working closely with the City of Los Angeles and Culver City in developing construction mitigation plans CEQA requires that mitigation measures be disclosed in the Draft EIR yet this document is a proposed Final EIR and the details of construction mitigation plans have still not been determined For example, haul routes and hours of operation have not been identified (Section 4 15 3 1 Mitigation Measure C1) The effectiveness and adequacy of mitigation measures cannot be determined if they are not revealed by the lead agency The document should be revised to identify specific mitigation measures for construction traffic impacts
- 8 Parking In the discussion of parking mitigation measures (p 4 15-10), there is no attempt to quantify the temporary loss of parking yet the document concludes that these mitigation measures (e g interviewing business owners) would mitigate impacts to less-than-significant levels Without identified thresholds for significance, it is not possible to determine whether this conclusion is justified
- 9 Noise and Vibration The mitigation measures for noise and vibration include monitoring (C16) and examples of noise reduction techniques (C17-26) but no criteria or performance standards are identified While monitoring is an important aspect of mitigation, it is not sufficient without further identification of clear performance standards and enforcement

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procedures Some mitigation measures contain weak language such as Metro may require contractors (C18) and If temporary sound barriers are required to meet City noise regulations, Metro shall review sound barrier designs prior to implementation (C25) (emphases added) These deficiencies should be corrected prior to certification of the Final EIS/EIR

Bikeway and Bikeway Facilities

- 1 Page 2 4-26 and 27 Design Option B and C Under each of these options the Final EIR states that the Class I bikeway would connect to a Class III bikeway at Wesley Street According to the preliminary design studies provided to the City by Metro, the Class I bikeway would connect to a Class III bikeway at *Helms Avenue* Metro must clarify which is correct before selecting any design options
- 2 Page 2 4 – 47, West End According to the Final EIR the proposed Bike Path ends at Wesley and bicyclists would be directed to use crosswalks to the Venice/Robertson Station or directed to use National Blvd to access the Venice Boulevard Bike Lane There is no further discussion of the appropriateness of directing bicyclist to National Boulevard for purposes of connecting from the Bike Path to/from the Venice Boulevard Bike Lane There is no discussion of what, if any, physical improvements would be need on National Boulevard to accommodate this potential increased activity The City recommends that Metro adopt a mitigation measure which requires that Metro prepare a bicycle and pedestrian access plan that analyses the selected design option for the Venice/Robertson Station, associated parking lots bikeway connections and access to/from each in order to identify the required implementation improvement necessary to provide safe access and egress The proposed bicycle and pedestrian access plan should be required to be prepared prior to the final design for the project is approved
- 3 Page 2 4 – 47 The Bike Path is proposed to be 12-feet wide and is intended to accommodate both bicyclists and pedestrians The Bike Path as it is currently envisioned intersects and incorporates existing and relocated sidewalk areas of cul-de-sacs at the end of Wesley Street, Helms and Caroline Avenues The City is concerned that Metro's plans as proposed are creating a potential hazardous conflict between pedestrian and bike path users Specifically the concern is about the interface between the public sidewalk in these locations and the Bike Path at the end of the cul-de-sacs The Bike Plan should be designed to eliminate these potential conflicts and to provide separate sidewalk area and if not separated adequate notice and warning of the potential hazard

In addition the City of Culver City will require that all cul-de-sacs modified and/or relocated as a part of the project shall be reconstructed to at a minimum be restored to turning radius no less than the existing cul-de-sacs, or better if possible. All cul-de-sac design and construction shall be reviewed and approved by the City prior to acceptance by the City.

- 4 Page 2 4-53, Bikeway Features, 2nd Paragraph The Final EIR discusses the use of applied surfaces on the Bike Path to create warnings and to instruct cyclist to slow down for intersections and transitions. These surfaces would be applied using traffic paint or thermal plastic film. Any applied material should not create a slipping hazard and should be approved for bikeway use in wet conditions.
- 5 Page 7-116, Last Paragraph The first sentence of this paragraph would lead the reader to believe the Class I Bike Path would connect directly to the Venice Boulevard Class II Bike Lanes. This is not the case under any of the proposed station options. At the least cyclists would be required to negotiate very challenging regionally serving intersections (i.e., Washington/National Venice/Robertson and/or Venice National). Depending on which station design option is selected, cyclist would also be required to exit the Bike Path at Washington Boulevard, Wesley Street or Helms Avenue. None of these streets currently are designated bikeways. As both Wesley Street (commercial) and Helms Avenue (residential) are narrow streets (curb to curb width of approximately 32 to 34 feet), with parking on both sides, it is unlikely that either would be generally used for a designated Class III Bike Route. National Boulevard was discussed as a potential route for connecting from the Bike Path to/from the Venice Boulevard Bike Lane. However, there is no discussion in the Final EIR of what, if any physical improvements would be needed on National Boulevard to accommodate this potential increased activity. The City recommends that Metro adopt a mitigation measure which requires that Metro prepare a bicycle and pedestrian access plan that analyzes the selected design option for the Venice/Robertson Station associated parking lots, bikeway connections and access to/from each, in order to identify the required implementation improvement necessary to provide safe access and egress. The proposed bicycle and pedestrian access plan should be required to be prepared prior to the final design for the project is approved.
- 6 Page 7-117, 1st Paragraph This paragraph erroneously states that the Class 1 Bike Path would not be accessible from north-south neighborhood streets. According to Metro's Preliminary Engineering Drawings issued June 3, 2005, the Bike Path would directly connect to each street from Fay Avenue to Wesley Street. The Bike Path is intended to also serve as the primary pedestrian path between the East Culver City and Rancho Higuera Neighborhoods.

- 7 Clean Mobility Center (Appendix H) A CMC is slated to be built at the Venice/Robertson station There are staffing and amenities such as restroom and bicycle facilities associated with the CMC What will this look like and where will it be placed as a part of any Venice/Robertson design options? Culver City would like to review and approve the final design and location of the CMC (See the complete list of features in Appendix H)

Culver City Redevelopment Agency Issues

- 1 The Final EIS/EIR fails to properly address the significant impacts of the Project due to inconsistency with the Culver City Redevelopment Agency ('Agency') Redevelopment Plan and the Design for Development for the Exposition Light Rail Transit and Station Area ("DFD") (including their incorporation of applicable policies of the City's General Plan) by proposing the at-grade crossing for the Project As explained further below, the Agency has concurrent jurisdiction over this Project with the Metro and Metro cannot ignore this concurrent jurisdiction The Redevelopment Plan and DFD prohibit at-grade crossings Therefore, the proposal of an at-grade crossing makes the Project inconsistent with all of the above-mentioned Plans Metro has failed to analyze this inconsistency, which amounts to a significant effect on the environment and must be mitigated

Section 4.1.2.1 (Land Use/Neighborhoods") Metro argues that Culver City would not have jurisdiction over the Exposition LRT's crossings, and the Culver City General Plan would no longer be applicable with respect to the Project Further, Metro explains that since Culver City does not have jurisdiction over the Exposition LRT's crossing the Culver City General Plan is not applicable and there is no significant impact on land use as a result of the Project's inconsistency with the Culver City's General Plan

As acknowledged in the Final EIS/EIR, the Project is within the jurisdictional boundaries of the Redevelopment Plan for the Culver City Redevelopment Project Pursuant to state law and as stated in the Redevelopment Plan, the Project improvements must conform to the City's General Plan and Redevelopment Plan The proposed at-grade crossing is in conflict with those plans Under the California Community Redevelopment Law, the station is proposed to be constructed within a Redevelopment Component Area that was adopted through the authority of state law The Redevelopment Plan for Culver City provides direction for this area and states very clearly that both public and private developers must conform to the Redevelopment Plan and any Design for Development Further, after extensive public comment and input, the Agency adopted the DFD, which prohibits at-grade crossing

Agency, as a state agency empowered under the California Community Redevelopment Law, has concurrent jurisdiction over the area impacted by the Project within the Culver Redevelopment Project Area along with Metro and the Public Utilities Commission (PUC) Under Orange County Air Pollution Control District v Public Utilities Commission (4 Cal 3d 945), the California Supreme Court found that the authority conferred on the PUC to grant permission to construct and operate privately owned electric generating units was concurrent with authority conferred on an air pollution control district to condition construction of such unit on compliance with district emission control standards Based on that, the court found that the PUC did not have exclusive jurisdiction in this case and that the air pollution control district had authority to regulate the generating units

The air pollution control district is a state agency controlled by a local governing body (board of supervisors) Similarly, the Agency is a state agency also controlled by a local body The same logic the court used in the above-mentioned case is applicable to this situation and Agency's authority to review the Project The Agency has concurrent jurisdiction with the PUC and Metro and has authority to review and approve the Project Therefore, Metro cannot ignore the Redevelopment Plan and DFD, both of which incorporate the City's General Plan policies for this Project Metro must address how it will comply with these regulations, and analyze the inconsistencies between the Project and the potential significant environmental effects that occur as a result of these inconsistencies

In furtherance of the argument that Agency has concurrent jurisdiction over this Project is that fact that Metro is attempting to show benefit from the Project by connecting to the Culver City Design for Development Area, but refuses to acknowledge the need to comply with the requirements of that same Design for Development Throughout the Final EIS/EIR Metro acknowledges the involvement of the Agency In the Final EIS/EIR Executive Summary, Page 68, under the Venice/Robertson heading Metro describes the area being served by the Venice/Robertson Station Metro specifically states that the Venice/Robertson Station is adjacent to a site of potential mixed-use transit-oriented development at Venice Boulevard, National and Exposition Boulevard, proposed by the Agency Metro not only acknowledges the involvement of Agency in the Project but also admits to the direct impacts of the Project to the City and Agency In Section 7.18 ("Land Use") of the Final EIS/EIR, the Metro, in describing how the Project is consistent with the 2001 Regional Transportation Plan and policies, lists under Activity Centers other activity centers that will be connected by the Project (such as Western Avenue Neighborhood and

Crenshaw District) and includes in this list reference to Culver City Design for Development Area This is in contradiction to Metro's earlier statement that because the PUC has exclusive jurisdiction over Light Rail Transit (LRT) crossings (including those LRT crossings of Culver City's streets) that Culver City would not have jurisdiction over the Project and Culver City General Plan would not be applicable with respect to the Project

The Final EIS/EIR is based on inadequate analysis because of the faulty legal assumptions that the City's General Plan is not applicable and Metro's complete disregard of the need for Agency approval of the Project Metro does have to take into account the City's General Plan, which standards and policies are incorporated in the Redevelopment Plan and DFD Because Metro has failed to do so, there is a significant impact which was not addressed nor mitigated Because the Final EIS/EIR does not address these significant effects, it cannot be utilized without the proper analysis and mitigation measures

- 2 The Final EIS/EIR incorporates a substantial number of individual significant changes and new or modified analysis which collectively result in significant changes to the Draft EIS/EIR since its circulation for public comment
 - a Section 2.3 ("Los Angeles Mid-City/Westside Transit Corridor Draft EIS/EIR") In describing the baseline analysis for the Project, Metro states the Notice of Preparation was filed on May 8, 2000 and also refers to the 2001 Regional Transportation Plan, which was adopted after the Notice of Preparation Therefore, the Draft EIS/EIR used 2001 as the baseline year for analyzing impacts of the Project The Draft EIS/EIR was originally circulated in 2001 and the Final EIS/EIR was released in 2005 With the lapse of a total of four years between the Draft and Final versions of the EIS/EIR, analysis with respect to impacts such as traffic is outdated During these four years additional projects have been developed and others are being proposed in this area, not realized at the time of the Draft EIS/EIR and have not been adequately analyzed and could not consider the cumulative impacts of local projects from 2002-2005
 - b Section 3.3.2.2 (Traffic) Metro states that it worked closely with the Los Angeles Department of Transportation (LADOT) to address their comments and concerns and as a result, Metro entirely revised the traffic analysis methodology for use in the Project impact analysis Both the methodology and data significantly changed from that used in the Draft EIS/EIR circulated to the public

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3 Additional data and analysis is required regarding other important impacts, including complete consideration and analysis of all Culver City schools impacted impacts of at-grade crossing to surrounding parks impacts of lack of adequate parking at the stations, and, addition of turn lanes and the impacts of installation of turn lanes at particular intersections These concerns are more particularly addressed in the paragraphs below

a Section 4 14 ("Parkland & Community Facilities") The Final EIS/EIR provides a table (Table 4 14-3) summarizing the impacts to community facilities within one-quarter mile of the Project under the Locally Preferred Alternative (LPA) In this table, Turning Point is listed as not being within one-quarter mile of the Project and therefore would not be impacted While this is true for the LPA, this would not be true for the Venice/Robertson Design Options The Venice/Robertson Design Options would bring Turning Point within one-quarter of a mile of the Project In addition, the Final EIS/EIR provides in footnote /g/ in Table 4 14-3, that loss of parking at Turning Point Elementary is not considered an adverse effect because the parking lot land is being leased to the school by Metro However the Final EIS/EIR does not address that there will still be impacts as a result of the Venice/Robertson Station and an increase in the number of cars and parking in the surrounding neighborhoods as a result of the Project, regardless of this lease agreement with Metro The impacts and any mitigation measures for the Venice/Robertson Design Options should be addressed in the Final EIS/EIR

b Section 4 1 1 4 ('Land Use/Neighborhoods) Metro states that it will work with Culver City and it's stakeholders to investigate transit oriented and joint development opportunities It is unclear in the Final EIS/EIR if this is a mitigation measure proposed by Metro The Final EIS/EIR fails to state how this mitigation measure will be implemented There is no discussion in the Final EIS/EIR of this as a mitigation measure and how it will diminish the possible significant environmental effects Metro should explain whether or not this is a proposed mitigation measure and how it plans to implement it as a mitigation measure

c Section 4 1 1 4 (Land Use/Neighborhoods) Metro states that the LRT alignment on the bridge structure over Ballona Creek (designed so that the LRT alignment and bridge structure touchdown at-grade before the first single-family house at Fay Avenue) and the elimination of all at-grade vehicular crossings from Fay Avenue to National Boulevard, including the existing crossing at Hayden Avenue, would be consistent with Culver City's General Plan policy of prohibiting aerial and at-grade LRT alignments in front of residential areas in Culver

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City However there is no discussion or analysis with respect to the impacts of the local adjacent parks near these residential neighborhoods The impacts to the parks as a result of this alignment should be addressed in the Final EIS/EIR

- d Section 3 3 2 3 (Parking) Metro states that there are sufficient areas to meet parking demand at each station location for Venice/Robertson and Crenshaw Metro points to both Venice/Robertson and Crenshaw as satisfying the anticipated demand in surface parking areas, while a six-level parking structure is needed at the La Cienega station Currently at these proposed sites the areas do not seem well suited for placement of parking An explanation should be provided describing where and how these surface parking areas will be provided for these stations and any potential impacts which may result and any possible mitigation measures to lessen the impacts
- e Section 3 2 4 3 (Traffic) Metro provides in the Mitigation Measures for the Washington Boulevard/ National Boulevard (LPA, La Cienega Station Option, Jefferson Boulevard Design Option') in the Final EIS/EIR that it shall ensure that the westbound approach and departures are converted to accommodate a left-turn lane, two through lanes and a through/right-turn lane The Final EIS/EIR also states that the westbound departure would require additional Metro right of way and the removal of parking to accommodate the new approach configuration The Final EIR/EIS however, does not address what the impacts of adding this mitigation measure would have on the surrounding area Metro should address the impacts of installing a left-turn lane, two through lanes and a through/right-turn lane at this intersection and any additional impacts which may result if the required additional right of way can not be acquired at this location

October 24, 2005
Comments from City Council and Redevelopment Agency Meeting
Mid-City Exposition Light Rail Transit Project FEIS/FEIR

PUBLIC COMMENTS (Oral)

Vince Moytl

- 1 MOS Design Options for interim station adjacent to residential areas and schools makes no sense
- 2 Metro has a history of failures (Gold and Orange Lines) and will not build a quality project
- 3 There are no fully developed plans at this stage to review to determine what is being proposed for the completed project
- 4 Would support a quality project

Susan Dean

- 1 Metro is using statistics for the larger Westside study area to support ridership and not information from the areas specifically adjoining the Expo ROW
- 2 There is not a thorough discussion of the use of Metro policing services verses the CCPD involvement
- 3 Wants the word "interim" as it applies to the Culver City station options defined
- 4 Wants to know why Metro's budget included approximately 25% for contingencies and cost escalations
- 5 Wants to know what impacts the distance from parking areas and the mode of travel to the station areas have on ridership
- 6 Wants to know if the ridership projections from the Gold Line are consistent with actual ridership
- 7 Believes the traffic discussion in the FEIS/FEIR is inadequate and does not accurately identify and/or analyze the impacts
- 8 Believes the walking distance from the parking areas is too great and will limit ridership
- 9 Stated that the FEIS/FEIR does not discuss any Shuttles to serve the station, parking and surrounding areas
- 10 Believes that the noise and vibration discussion is inadequate
- 11 Wants more information on the proposed landscape berms and their effectiveness on mitigating noise
- 12 Believe that the stop short station design option would impact the residential areas more than just Helms Ave

Russell Tanner

- Wants to see EXPO LRT proceed along ROW through Cheviot Hills

Paul Goodwin

- Parking in the neighborhoods is a potential problem. He has experience with the Red Line in that before 8 30 AM, parking is generally available in Metro parking lots. After 8 30 AM the lots are full and people are searching adjacent neighborhoods for street parking.

PUBLIC COMMENTS (Written)

Marta Zarigoza

- Metro can not be trusted

Mark Alpers

- Supports the project and wants the City to push for Metro to begin work on the Phase 2 DEIS/DEIR as soon as possible

Shelly Rothman

- 1 Warning devices will cause noise impacts to neighborhoods
- 2 Vibration impacts will be created
- 3 Concerned about the safety issues related to pedestrians and the proximity of schools to the ROW

Loni Anderson

- 1 Concerned about the impacts to the neighborhoods from the proposed station location Design Options
- 2 Concerned about potential traffic impacts in the station areas and the neighborhoods
- 3 Concerned that the inconvenience of parking in the Metro lots will cause parking in the neighborhoods
- 4 Concerned about LRT operations on emergency response times

COUNCIL AND AGENCY MEMBER COMMENTS

Corlin

- 1 Wants to know what the difference in traffic generated and impacts would be between a Culver City station that was the interim end of the line verse if the station were a station along a line that continued beyond
- 2 Wants to know what is meant by budget contingences
- 3 Wants to know what experience Metro has in demolishing and reconstructing operating stations
- 4 Wants to know if Metro has asked Culver City for money to build the aerial station project Doesn t want City to help pay for building it right the first time Any Culver City money should be used for enhance station and lines connection to the residential employment and commercial areas
- 5 Did not see any reference to the existence of the Alquist-Priolo Seismic Safety Zone intersecting the ROW in the FEIS/FEIR
- 6 Wants the FEIS/FEIR review period extended
- 7 Wants an explanation about the authority of the Public Utilities Commission (PUC) over the project and how it relates to the City's and Agency s authority (Page 7 132 – 133)
- 8 Wants to know what methodology Metro used to analyze traffic impacts

- 9 Wants to know what methodology Metro used to develop ridership, especially how was walking distances factored into analysis
- 10 Wants information regarding Metro's past EIR ridership projections and actual ridership once lines are in operation
- 11 Wants City to survey Culver City residents to determine how many would actually ride the proposed LRT
- 12 What is the meaning of Locally Preferred Alternative
- 13 Wants to know what discussions the Council Subcommittee has had with Metro regarding the Design Options
- 14 Wants to know if City and Metro Staffs have discussed the Design Options
- 15 Wants to know the process for the Agency to drive the Project and Design Options
- 16 Will there be Agency/Metro land swaps
- 17 What is the Agency's ultimate power

Gross

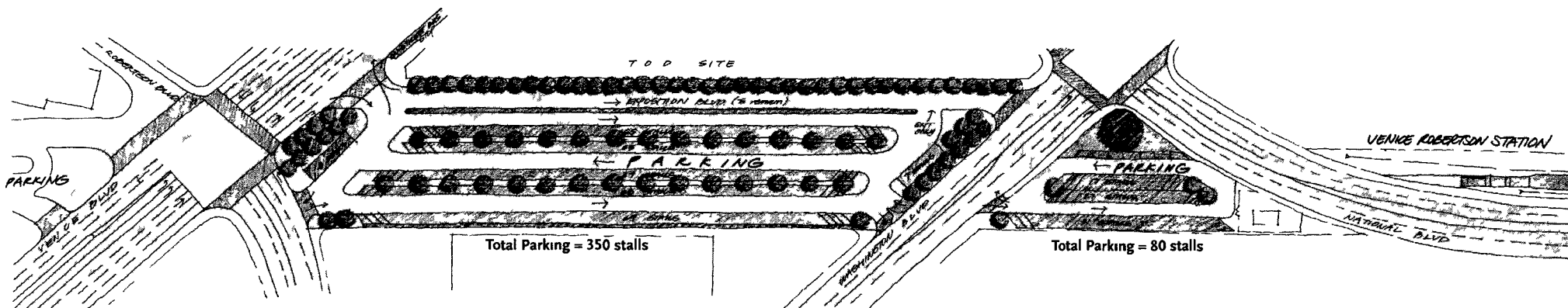
- 1 How many pages of comments does the staff anticipate the City's comments will be
- 2 The FEIR/FEIS includes a Metro Staff recommendation that the project not cross Washington BI and National BI at this stage
- 3 There will not be warning devices cause noise impacts because there will not be any at-grade crossings in the City
- 4 Has Metro asked us for funding contributions
- 5 Discussed timing for when naming of Culver City station will occur Supports naming the station 'Culver Junction'
- 6 Wants to know if FEIS/FEIR analyzes National BI ambient noise and the noise generated by LRT operations

Rose

- Will submit comments later prior to Nov 21 Council meeting

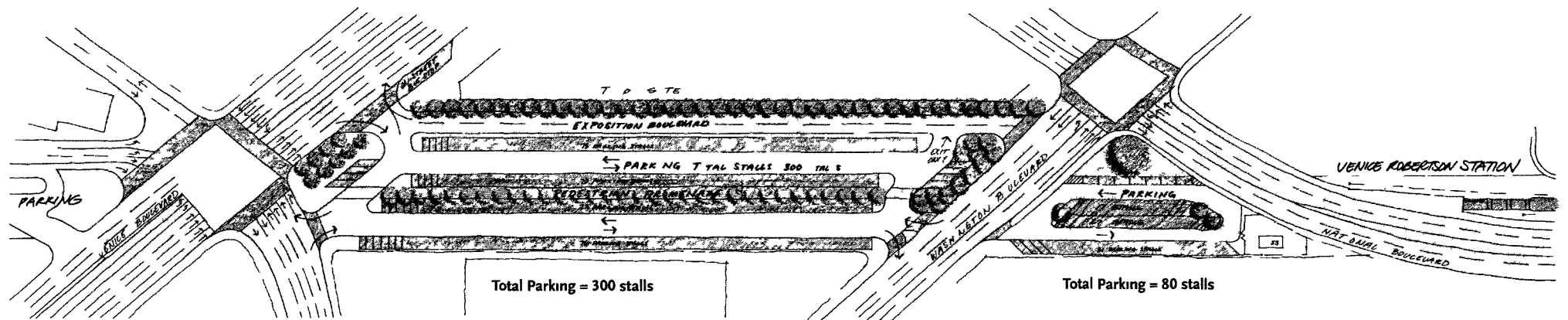
Silbiger

- Will submit comments later



Option 1 Maximized Parking

45 degree parking = 430 total stalls in 2 lots between Venice and National



Option 2 Pedestrian Promenade

90 degree parking = 380 total stalls in 2 lots between Venice and National

Mid City Exposition Light Rail Transit Project Venice-Robertson Station Parking Alternatives

