

the Little Tokyo community, and identified municipal leaders to guide them in the decision-making process as it relates to the proposed station locations, alignment options, and anticipated mitigation measures. Input from the community was incorporated into the refinement of the Locally Preferred Alternative and the mitigation measures presented in this Final EIS/EIR.

Response to Comment CN1-11

Thank you for your comment. Support for the Fully Underground LRT Alternative is noted. The Metro Board of Directors voted on October 28, 2010 to designate the Fully Underground LRT Alternative as the Locally Preferred Alternative.

Response to Comment CN1-12

The At-Grade Emphasis LRT Alternative would improve transit service in Little Tokyo by increasing the number of destinations reachable with a one-seat ride from the existing Little Tokyo/Arts District Station. The disproportionate adverse community and neighborhood impacts that the At-Grade Emphasis LRT Alternative would cause in Little Tokyo were documented in Section 4.17.3.3 of the Draft EIS/EIR and this Final EIS/EIR. This alternative is not being pursued for further study. The Metro Board of Directors voted on October 28, 2010 to designate the Fully Underground LRT Alternative as the Locally Preferred Alternative.

Response to Comment CN1-13

None of the proposed alternatives would have significant adverse community or neighborhood impacts remaining after mitigation, as documented in Table 4.3-4 of the Draft EIS/EIR and this Final EIS/EIR. However, both the At-Grade Emphasis LRT Alternative's and Underground Emphasis LRT Alternative's Alameda Street underpass and pedestrian bridge would result in disproportionate adverse environmental justice impacts, as reported in Sections 4.17.3.3.2 and 4.17.3.4.2 of the Draft EIS/EIR and this Final EIS/EIR. The proposed pedestrian bridges would be compliant with the Americans with Disabilities Act, and would have elevator access for elderly persons who are unable to use the escalators or stairs. Neither the At-Grade Emphasis LRT Alternative nor the Underground Emphasis LRT Alternative are being pursued for further study. The Metro Board of Directors voted on October 28, 2010 to designate the Fully Underground LRT Alternative as the Locally Preferred Alternative.

Response to Comment CN1-14

Section 1.4.2 of the Draft EIS/EIR and this Final EIS/EIR identified populations of Asian, African-American, White, and Hispanic populations in the project area based on census demographic data. The importance of Little Tokyo as one of the three Japantowns in the nation was appropriately discussed in Section 4.17.2 of the Draft EIS/EIR and this Final EIS/EIR.

Response to Comment CN1-15

The design of the pedestrian bridge would have incorporated elevators to provide access to senior citizens and disabled persons. The underpass on Alameda Street would reduce vehicular traffic at the intersection, which would be beneficial to all pedestrians. A pedestrian bridge in Little Tokyo is included only in the At-Grade Emphasis LRT Alternative and the Underground Emphasis LRT Alternative. The Metro Board of Directors voted on October 28, 2010 to

designate the Fully Underground LRT Alternative as the Locally Preferred Alternative, which does not include an underpass or pedestrian bridge in Little Tokyo.

Response to Comment CN1-16

Please refer to Response to Comment CN1-15, above.

Response to Comment CN1-17

Comment acknowledged. Section 2.4.5 of the Draft EIS/EIR and this Final EIS/EIR described typical underground construction using TBM. All TBM options were discussed in the Draft EIS/EIR because all options were a possible construction method depending on the alternative. The Draft EIS/EIR analyzed the most conservative TBM scenario for each environmental resource area. Based on further study, it was determined that one larger TBM would not be used during construction. The tunnels could be constructed using one TBM inserted and then transported back to the original insertion site and re-inserted; or two TBMs would be used, with the second machine inserted slightly later than the first TBM and both are pulled from the site, with no need for re-inserting.

Response to Comment CN1-18

Metro has made refinements to the Locally Preferred Alternative in response to community input. The refinements would greatly reduce impacts to businesses. The refined alternative would not involve cut and cover construction on 2nd Street, and would minimize acquisitions on the block bounded by 1st Street, Central Avenue, 2nd Street, and Alameda Street. The majority of parking spaces and businesses, including the Office Depot, on this block would not need to be acquired. However, Señor Fish, Weiland Brewery and the former Café Cuba (The Spice Table) would still need to be displaced.

Response to Comment CN1-19

Comment acknowledged. Off-street parking impacts were analyzed in Section 4.2, Displacement and Relocation, of the Draft EIS/EIR and this Final EIS/EIR. The following reference has been added to Section 3.1.3 of this Final EIS/EIR:

Evaluation of potential parking impacts included consideration of:

- The availability of parking within one-half mile walking distance; and
- The availability of loading zones in relation to the location of commercial enterprises.

Refer to Section 4.2, Displacement and Relocation, for analysis of off-street parking impacts.

Response to Comment CN1-20

Comment acknowledged. Travel time is already taken into account under the threshold. If bicycle commutes or pedestrian routes are lengthened, the time to travel along those commutes or routes would also lengthen. Section 3.1.4 of this Final EIS/EIR has been modified as follows:

- Detours that might lengthen bicycle commutes or pedestrian routes (which would increase travel time); and

Response to Comment CN1-21

The level of service data in Section 3.2.2.1 of the Draft EIS/EIR is correct, per the on-site traffic counts performed by Metro. These counts are supplemented with traffic data from before the bridge closure in order to accurately gauge the potential impacts of the Regional Connector.

Response to Comment CN1-22

Comment acknowledged. The title of Table 3-3 has been modified to read:

Table 3-3. Average Daily Ridership on Metro Bus Lines Serving the Project Area (2009).

Response to Comment CN1-23

Comment acknowledged. Off-street parking impacts were analyzed in Section 4.2, Displacement and Relocation, of the Draft EIS/EIR and this Final EIS/EIR. The following reference has been added to Section 3.2.3 of this Final EIS/EIR:

Along the majority of the proposed build alternative alignments, parking regulations permit on-street parking in one or both directions during the AM and PM peak hours. Refer to Section 4.2, Displacement and Relocation, for analysis of off-street parking impacts.

Response to Comment CN1-24

The pedestrian bridge would lengthen crossings of Alameda Street, but this would be offset by eliminating the need to wait for a walk signal. Pedestrian safety would also be improved because the bridge would reduce the existing potential for conflicts between automobiles and pedestrians. The bridge would include elevators and escalators for elderly residents, and would be fully compliant with the Americans with Disabilities Act. The Metro Board of Directors voted on October 28, 2010 to designate the Fully Underground LRT Alternative as the Locally Preferred Alternative, which does not include an underpass or pedestrian bridge in Little Tokyo.

Response to Comment CN1-25

Figure 3-7 of the Draft EIS/EIR and this Final EIS/EIR shows that level of service at 1st and Alameda would decline under the At-Grade Emphasis LRT Alternative. The Metro Board of Directors voted on October 28, 2010 to designate the Fully Underground LRT Alternative as the Locally Preferred Alternative.

Response to Comment CN1-26

Level of service at 1st and Alameda would improve under the Underground Emphasis LRT Alternative due to the new underpass. The new underpass at 1st and Alameda is part of the Underground Emphasis LRT Alternative. The Metro Board of Directors voted on October 28, 2010 to designate the Fully Underground LRT Alternative as the Locally Preferred Alternative.

Response to Comment CN1-27

The analysis in Section 3.3.4.2.2 of the Draft EIS/EIR and this Final EIS/EIR assumes the presence of the portal and at-grade tracks at 1st and Alameda. Traffic circulation impacts related to the construction of the portal were discussed in Section 3.3.4.1.2 of the Draft EIS/EIR and this Final EIS/EIR. These impacts pertain to the Underground Emphasis LRT Alternative. The Metro

Board of Directors voted on October 28, 2010 to designate the Fully Underground LRT Alternative as the Locally Preferred Alternative.

Response to Comment CN1-28

Comment acknowledged. Off-street parking impacts were analyzed in Section 4.2, Displacement and Relocation, of the Draft EIS/EIR and this Final EIS/EIR. The following reference has been added to Section 3.3.4.2.3 of this Final EIS/EIR:

The parking impacts identified under this alternative would be adverse only in the Little Tokyo community portion of the alignment, but even there ~~they impacts~~ would be less than significant after implementation of proposed mitigation. Refer to Section 4.2, Displacement and Relocation, for analysis of off-street parking impacts.

Response to Comment CN1-29

The pedestrian bridge would lengthen crossings of Alameda Street, but this would be offset by eliminating the need to wait for a walk signal. Pedestrian safety would also be improved because the bridge would reduce the existing potential for conflicts between automobiles and pedestrians. The bridge would include elevators and escalators for elderly residents, and would be fully compliant with the Americans with Disabilities Act. The Metro Board of Directors voted on October 28, 2010 to designate the Fully Underground LRT Alternative as the Locally Preferred Alternative, which does not include an underpass or pedestrian bridge in Little Tokyo.

Response to Comment CN1-30

Temporary lane closures would be needed on 2nd Street and a portion of Central Avenue between 1st and 2nd Streets for relocation of utilities and cut and cover activities for proposed stations. Refinement of the Locally Preferred Alternative would reduce the amount of cut and cover construction needed on 2nd Street. The Draft EIS/EIR indicated this in Section 4.18.2.2.

Response to Comment CN1-31

Comment acknowledged. At the time the Draft EIS/EIR was circulated for public review, both TBM insertion sites were being considered. Both TBM insertion sites were analyzed in the Draft EIS/EIR where appropriate. On October 28, 2010, the Metro Board of Directors voted to designate the Fully Underground LRT Alternative as the Locally Preferred Alternative. Based on comments received on the Draft EIS/EIR and input received from community meetings held during preparation of this Final EIS/EIR, the TBM insertion site options at 2nd/Central Avenue station and 2nd/Hope Street station are no longer being considered. Instead, the vacant property to the northeast of 1st and Alameda Streets, formerly known as the Mangrove Site, would be used as the insertion site. Please refer to Response to Comment CN1-4, above. Please refer to Section 4.18, Construction Impacts, of this Final EIS/EIR for further detail regarding tunnel boring operations at the Mangrove property. Chapter 3, Transportation Impacts and Mitigation, and Chapter 4, Environmental Analysis, Consequences, and Mitigation, of the Draft EIS/EIR have been revised in this Final EIS/EIR based on the new TBM insertion site. A portion of the Mangrove property was identified for construction staging in the Draft EIS/EIR.

Response to Comment CN1-32

Comment acknowledged. Off-street parking impacts were analyzed in Section 4.2, Displacement and Relocation, of the Draft EIS/EIR and this Final EIS/EIR. The following reference has been added to Section 3.3.5.1.3 of this Final EIS/EIR:

Potential impacts to available parking during construction of the ~~Fully Underground LRT~~ LPA would result in an adverse impact only in the Little Tokyo community portion of the alignment; however, even within Little Tokyo but even there the potential impact would be less than significant after implementation of proposed the final mitigation measures in Section 3.4.2 and Chapter 8. Refer to Section 4.2, Displacement and Relocation, for analysis of off-street parking impacts.

Response to Comment CN1-33

Level of service at 1st and Alameda would improve under the Locally Preferred Alternative due to the at-grade light rail tracks being removed from service. Trains would no longer pass through the intersection, thereby freeing up cycle time for auto traffic.

Response to Comment CN1-34

Level of service at 1st and Alameda would improve under the Locally Preferred Alternative due to the at-grade light rail tracks being removed from service. Trains would no longer pass through the intersection, thereby freeing up cycle time for auto traffic.

Response to Comment CN1-35

Comment acknowledged. The following note has been incorporated in the fourth paragraph of Section 3.3.5.2.2 of this Final EIS/EIR.

Only one intersection during the AM peak hour and only three intersections during the PM peak hour would experience a significant adverse impact from the ~~Fully Underground LRT~~ Alternative LPA. It should be noted, none of the adversely impacted intersections are located in Little Tokyo.

Response to Comment CN1-36

Comment acknowledged. Off-street parking impacts were analyzed in Section 4.2, Displacement and Relocation, of the Draft EIS/EIR and this Final EIS/EIR. The following reference has been added to Section 3.3.5.2.3 of this Final EIS/EIR:

The on-street parking impacts identified under ~~this alternative the LPA~~ would not be adverse. Only 13 on-street parking spaces would be displaced, in an area with multiple off-street garages. Also, the parking spaces would be replaced by access points to a new underground light rail station, and the improved transit access would offset the effects of the lost parking. Therefore, the on-street parking impacts would not be adverse and would be less than significant. Refer to Section 4.2, Displacement and Relocation, for analysis of off-street parking impacts.

Response to Comment CN1-37

The Mitigation Monitoring and Reporting Program for the Locally Preferred Alternative (Chapter 8) of this Final EIS/EIR identifies specific replacement parking sites and mitigation measures to

offset parking impacts during construction. This includes two acres of land on the Mangrove property, located at the northeast corner of 1st and Alameda Streets, for the purposes of providing supplemental parking services, such as valet parking services during construction. Preliminary drafts of the Mitigation Monitoring and Reporting Program were submitted to the Little Tokyo Working Group for review. Some demand for parking in the long term would be offset by the introduction of improved light rail service into the community.

Response to Comment CN1-38

Comment acknowledged.

Response to Comment CN1-39

Chapter 3, Transportation Impacts and Mitigation, of the Draft EIS/EIR and this Final EIS/EIR, discusses transportation circulation impacts. Impacts to the loading spaces at the Japanese American National Museum were considered in the analysis presented in Section 3.3.5.1.3 of the Draft EIS/EIR and this Final EIS/EIR. Impacts to the museum itself are non-transportation impacts, and were appropriately discussed in Section 4.2.4.4 of the Draft EIS/EIR.

Response to Comment CN1-40

Comment acknowledged. The third paragraph of Section 4.3.2.4.6 of this Final EIS/EIR has been modified to read:

Little Tokyo, which exists to the east and west of Alameda Street, contains a variety of important cultural venues and resources including the Japanese American National Museum, the Jodo Shu Betsuin Temple, the Los Angeles Homba Hongwanji Temple, and the Japanese-American Cultural and Community Center.

Response to Comment CN1-41

As indicated in Section 4.3, Community and Neighborhood Impacts, and Appendix O, Community and Neighborhood Impacts Technical Memorandum, of the Draft EIS/EIR and this Final EIS/EIR, the At-Grade Emphasis LRT Alternative would not physically divide an established community. Automobiles, pedestrians, and bicycles would still be able to cross the alignment at roadway intersections to access the communities to the north and south. At the intersection of Temple and Alameda Streets in the Little Tokyo community, the addition of an automobile underpass would facilitate movement of traffic on Alameda Street by allowing it to travel below the intersection without stopping and, thus, enhancing community mobility. A pedestrian bridge would also be located where the tracks would cross Alameda Street, which would allow pedestrians and bicyclists to cross the street. The Underground Emphasis LRT Alternative would not create a barrier that would impede vehicle, bicycle, or pedestrian access. Vehicle, bicycle, and pedestrian access at the intersection of 1st and Alameda Streets would be maintained as indicated above. Therefore, this alternative would not physically divide a community and impacts would be less than significant. Nonetheless, the At-Grade Emphasis LRT Alternative is not the designated Locally Preferred Alternative and will not be studied further. The Fully Underground LRT Alternative has been designated as the Locally Preferred Alternative.

Response to Comment CN1-42

As with the At-Grade Emphasis LRT Alternative, the Underground Emphasis LRT Alternative would not physically divide an established community. As part of the Underground Emphasis LRT Alternative, the Alameda Street underpass would be constructed at 1st Street in the Little Tokyo community, which would carry car and truck through traffic along Alameda Street beneath 1st Street and the rail junction. In addition, an optional overhead pedestrian bridge structure would maintain pedestrian and bicyclist access to the north and south sides of Alameda Street and enhance mobility. The Underground Emphasis LRT Alternative would not create a barrier that would impede vehicle, bicycle, or pedestrian access. Vehicle, bicycle, and pedestrian access at the intersection of 1st and Alameda Streets would be maintained as indicated above. Therefore, this alternative would not physically divide a community and impacts would be less than significant. Nonetheless, the Underground Emphasis LRT Alternative is not the designated Locally Preferred Alternative and will not be studied further. The Fully Underground LRT Alternative has been designated as the Locally Preferred Alternative.

Response to Comment CN1-43

Please refer to Response to Comment CN1-41, above. Under the At-Grade Emphasis LRT Alternative, the automobile underpass under Alameda Street and the pedestrian bridge located where the tracks would cross Alameda Street would enhance community mobility. Therefore, this alternative would not impair community mobility or create a physical barrier to cross Alameda Street and impacts would be less than significant. Nonetheless, the At-Grade Emphasis LRT Alternative is not the designated Locally Preferred Alternative and will not be studied further. The Fully Underground LRT Alternative has been designated as the Locally Preferred Alternative.

Response to Comment CN1-44

Please refer to Response to Comment CN1-42, above. As part of the Underground Emphasis LRT Alternative, the Alameda Street underpass constructed at 1st Street and the pedestrian bridge located where the tracks would cross Alameda Street would enhance community mobility. Therefore, this alternative would not impair community mobility or create a physical barrier to cross Alameda Street and impacts would be less than significant. Nonetheless, the Underground Emphasis LRT Alternative is not the designated Locally Preferred Alternative and will not be studied further. The Fully Underground LRT Alternative has been designated as the Locally Preferred Alternative.

Response to Comment CN1-45

The duration and intensity of construction impacts related to TBM operations were shown in Table 4.18-2 of the Draft EIS/EIR and for the Locally Preferred Alternative in Table 4.18-1 of this Final EIS/EIR. The Locally Preferred Alternative has been modified since publication of the Draft EIS/EIR to relocate the potential TBM insertion site to the Mangrove property in order to reduce impacts. Please refer to Response to Comment CN1-4, above.

Response to Comment CN1-46

Please refer to Response to Comment CN1-7, above.

Response to Comment CN1-47

This mitigation measure has been recorded in Section 4.17.4.2 of this Final EIS/EIR as one of the mitigation measures suggested by the Little Tokyo community. Metro has identified measures in the Mitigation Monitoring and Reporting Program for the Locally Preferred Alternative (Chapter 8) of this Final EIS/EIR that will provide support for the Little Tokyo businesses. This could take the form of in-kind advertising, Metro-sponsored coupons, city-wide advertising that Little Tokyo is open for business during construction, and similar supportive measures.

Response to Comment CN1-48

Please refer to Response to Comment CN1-9, above.

Response to Comment CN1-49

The following mitigation measure has been added to Section 4.17.4.3 of this Final EIS/EIR and the Mitigation Monitoring and Reporting Program for the Locally Preferred Alternative (Chapter 8):

Metro shall provide services to support affected Little Tokyo businesses and organizations during construction such as targeted advertising and marketing campaigns, Metro-sponsored coupons, incentives for construction worker patronage, and Metro-sponsored community events. Metro shall provide free technical support assistance (i.e., website development) to local businesses on strategies for business development that can minimize any adverse impacts of construction. This can include, but not be limited to, assistance with accounting or advertising. Metro shall work with the RCCLC including businesses, tenants, property owners, and government agencies with jurisdiction to make policy to resolve issues arising from adverse business issues during all phases of construction. The committee shall work to develop an implementation plan for these services and determine their content. The committee shall also be kept apprised of construction progress and upcoming transit, parking, or access changes. Metro shall provide maps showing existing and planned access during all phases of construction. Metro shall also provide directional signage to temporary parking facilities. These activities shall be conducted in a manner consistent with the similar program developed for the Crenshaw Transit Corridor Project.

Response to Comment CN1-50

The mitigation measure recommendations were segregated in the Draft EIS/EIR because they are a distinct part of the environmental justice outreach process. Like all other appropriate mitigation measures in the Draft EIS/EIR, feasible measures from the Little Tokyo Working Group recommendations have been incorporated into the Mitigation Monitoring and Reporting Program for the Locally Preferred Alternative (Chapter 8). The Mitigation Monitoring and Reporting Program for the Locally Preferred Alternative, Chapter 8, contains final mitigation measures for the Locally Preferred Alternative; the Mitigation Monitoring and Reporting Program will be approved by the Metro Board of Directors upon certification of this Final EIS/EIR. These mitigation measures will also be included in a Record of Decision subsequently issued by FTA. Metro will formally commit to implement all mitigation measures in the Mitigation Monitoring and Reporting Program for the Locally Preferred Alternative upon certification of this Final EIS/EIR and issuance of the Record of Decision by FTA.

Response to Comment CN1-51

Partially open-roof stations are being considered as an urban design measure where possible. Metro has refined the Locally Preferred Alternative alignment in Little Tokyo primarily to reduce impacts, but this refinement may also have the benefit of reducing project capital costs.

Response to Comment CN1-52

Comment acknowledged.

Response to Comment CN1-53

Comment acknowledged. Table 6-15 of the Draft EIS/EIR showed that the Fully Underground LRT Alternative performs the best compared to the No Build, TSM, and other build alternatives for both new transit trips and project transit trips.

Response to Comment CN1-54

Thank you for your comment. Support for the Fully Underground LRT Alternative is noted. The Metro Board of Directors voted on October 28, 2010 to designate the Fully Underground LRT Alternative as the Locally Preferred Alternative.

Response to Comment CN1-55

Comment acknowledged. As indicated in Chapter 6, Cost and Performance Considerations, of the Draft EIS/EIR and this Final EIS/EIR, the value of unique and diverse communities in the project area and the support of community preservation, which includes balancing the benefits and impacts while preserving communities in the area, such as Little Tokyo, the Arts District, Bunker Hill, Civic Center, and the Historic Core, are already included as goals and objectives for evaluating potential alternatives for the Regional Connector Transit Corridor project.

Response to Comment CN1-56

Comment acknowledged. The Little Tokyo Community Council has been added to the List of Key Stakeholder Groups and Organizations table in Chapter 7, Public and Agency Outreach, of this Final EIS/EIR.

Community Organizations, Neighborhood Groups, and Homeowner Associations:

Downtown Los Angeles Neighborhood Council	Higgins Homeowners Association
Historic Cultural Neighborhood Council	Savoy Homeowners Association
<u>Little Tokyo Community Council</u> [^]	

Response to Comment CN1-57

Comment acknowledged. Chapter 7, Public and Agency Outreach, of this Final EIS/EIR has been modified to clarify that the Little Tokyo Community Council’s PCPC is the Planning and Cultural Preservation Committee.

- Little Tokyo Community Council: ~~Parking~~–Planning, and Cultural Preservation Committee

Subject: FW: Public Comment on Metro Regional Connector, 10-6-2010

Date: Friday, October 8, 2010 12:24 PM

From: Regional Connector <RSC_RegionalConnector@metro.net>

To: Dolores Roybal Saltarelli <roybald@metro.net>, Laura Cornejo <CORNEJOL@metro.net>, "Leung, Julie" <LEUNGJ@metro.net>, Clarissa Filgioun <clarissa@therobergroup.com>, Ginny Brideau <ginny@therobergroup.com>

From: Craig Ishii [mailto:cishii@jaclpsw.org]

Sent: Wednesday, October 06, 2010 6:26 PM

To: Regional Connector

Subject: Public Comment on Metro Regional Connector, 10-6-2010

Name: Craig Ishii

Organization: Japanese American Citizens League - Pacific Southwest District

Address: 244 S. San Pedro St. Suite 406, Los Angeles 90012

Telephone: 213-626-4471

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Comment:

I speak on behalf of the Japanese American Citizens League - Pacific Southwest District. Our organization, as a fellow Little Tokyo community-based nonprofit organization supports the Fully-Underground Regional Connector option as the **ONLY** acceptable alternative for the Metro Regional Connector. We appreciate the continuous dialogue that MTA has engaged in with Little Tokyo nonprofits, residents and small businesses.

1

The JAACL Pacific Southwest District is a member of the Little Tokyo Community Council (LTCC). As an active participant with the LTCC Preservation and Planning Committee as well as the LTCC Transit Committee, we would also like to reiterate the 6 major comments on the Draft EIR/EIS provided by the LTCC:

2

1) The LTCC strongly supports Metro's finding that "the Draft EIS/EIR does designate the Fully Underground LRT Alternative...as a staff recommended Preferred Alternative based on the technical analysis...and input received from the community." We concur that the Fully Underground Alternative "was developed to best address community concerns simultaneous with cost, operational, and design concerns." Further, the analysis the EIS/EIR shows it is clearly the best performing alternative from a ridership, travel time savings, environmental, cost-effectiveness, and social impact perspective. It is also nearly the cheapest alternative to operate and maintain over time. From the Little Tokyo community perspective, it is the only alternative that adequately addresses our concerns about environmental, economic, social, and cultural impacts to the community. The other alternatives pose significant disproportionate impacts on Little Tokyo.

2) The EIS/EIR should correct its assessment of the impacts of the At-Grade Emphasis and Underground Emphasis alternatives. The draft understates the environmental impacts on the Little Tokyo community of the grade separations required along Alameda Street that would physically bisect the Little Tokyo community, potential impacts if tunnel boring were to be initiated from 2nd/Central, and the aesthetic impacts associated with at-grade LRT operations through our community. As such, these two alternatives would place disproportionate burdens on a minority community in the areas of Transit Service Equity Deterioration and Community and Neighborhood Impacts. 3

3) If Metro cannot commit to initiate TBM activities at 2nd/Flower/Hope until Preliminary Engineering is complete, the EIS/EIR should more clearly distinguish the extent and duration of construction impacts that could affect Little Tokyo if boring begins at 2nd/Central. This information is critical to determining whether the community will endure disproportionate impacts during construction activities. 4

4) While many mitigation measures are identified throughout the document, the recommendations from the LTCC are segregated as a package of candidate measures to be considered by Metro and FTA. Please confirm the process for approving mitigation measure recommendations and whether this differs from mitigation measures cited elsewhere in the document. 5

5) The LTCC calls for Metro to formalize an agreement with the Little Tokyo community that provides us with a substantial role in decision-making during the Preliminary Engineering, Final Design, and construction phases that addresses:

- Little Tokyo's formal involvement in the development and approval of mitigation measures for the Little Tokyo community,
- Little Tokyo's formal involvement in the monitoring of mitigation measures through the Mitigation Monitoring Plan,
- How to provide a sufficient safety net for Little Tokyo businesses that will be affected during construction,
- Redevelopment of the Office Depot block

6

6) The Draft EIS/EIR does not reflect the language adopted by the LTCC on May 25, 2010 that included refinements to its comments on the pending environmental analysis. These changes stem from additional comments from the Little Tokyo community in late April and amend comments that were transmitted to Metro in our letter dated April 27, 2010. The approved changes are shown in underline. 7

- Expand the safety net for Little Tokyo businesses that will be affected during construction. This can include having Metro provide additional financial and other resources to the community and/or businesses to provide more targeted marketing, as well as financial compensation to local businesses for any loss in gross sales. The process for establishing eligibility, quantifying financial assistance or compensation, and related details would be established jointly between Metro and Little Tokyo stakeholders. 8

- Metro shall work with the Little Tokyo community businesses to ensure no adverse impacts to business operations prior to relocation of or protection of in-place utilities and during construction activities. The LTCC and Metro shall consider establishing a Business Interruption Committee that will streamline Metro's communication with the community and avoid adverse business interruptions. This committee shall include local businesses and property owners. 9

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Craig Ishii

Regional Director

Japanese American Citizens League - Pacific Southwest District

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JACL PSW September/October News Bytes

JACL to Honor Three Community Leaders at 14th Annual Awards Dinner <http://www.jaclpsw.org/index.php?option=com_content&view=article&id=123&Itemid=57>

Major Updates on the Metro Regional Connector <http://www.jaclpsw.org/index.php?option=com_content&view=article&id=113&Itemid=2>

http://www.jaclpsw.org/index.php?option=com_content&view=article&id=64&Itemid=27 <http://www.jaclpsw.org/index.php?option=com_content&view=article&id=64&Itemid=27> Project Community H
<http://www.jaclpsw.org/index.php?option=com_content&view=frontpage&Itemid=1> osts Culmination with
Generous Support from AT&T

Visit www.jaclpsw.org <<http://www.jaclpsw.org/>> for more information on upcoming programs in the JACL Pacific Southwest District!

Visit www.jacl.org <<http://www.jacl.org/>> for news and updates about National JACL.

CN2**Responses to Comments from Japanese American Citizens League - Pacific Southwest District, Ishii, Craig****Response to Comment CN2-1**

Thank you for your comment. Support for the Fully Underground LRT Alternative is noted. The Metro Board of Directors voted on October 28, 2010 to designate the Fully Underground LRT Alternative as the Locally Preferred Alternative.

Response to Comment CN2-2

Thank you for your comment. Support for the Fully Underground LRT Alternative is noted. Please refer to Responses to Comments CN2-3 through CN2-9, below, for detailed responses to concerns raised by the commenter.

Response to Comment CN2-3

The impacts of the proposed pedestrian bridge and roadway underpass in Little Tokyo were discussed in Sections 4.17.3.3.2 and 4.17.3.4.2 of the Draft EIS/EIR and this Final EIS/EIR, respectively. The potential impacts of beginning tunnel boring machine operations at 2nd and Central were described in Section 4.18.3.4 of the Draft EIS/EIR. Impacts were adequately analyzed in the Draft EIS/EIR. Disproportionate impacts on the Little Tokyo community were analyzed in Section 4.17, Environmental Justice, of the Draft EIS/EIR and this Final EIS/EIR. The Metro Board of Directors voted on October 28, 2010 to designate the Fully Underground LRT Alternative as the Locally Preferred Alternative. The refined Locally Preferred Alternative would not involve construction of any pedestrian bridges or roadway underpasses in Little Tokyo, and would not involve starting tunnel boring machine operations at 2nd and Central. Tunnel boring machine operations would instead begin at the Mangrove property as indicated in Section 4.18, Construction Impacts, of this Final EIS/EIR which is farther from the center of Little Tokyo and would involve fewer impacts.

Response to Comment CN2-4

Please refer to Response to Comment CN1-4, above.

Response to Comment CN2-5

The mitigation measure recommendations were segregated in the Draft EIS/EIR because they are a distinct part of the environmental justice outreach process. Like all other appropriate mitigation measures in the Draft EIS/EIR, feasible measures from the Little Tokyo Working Group recommendations have been incorporated into the Mitigation Monitoring and Reporting Program for the Locally Preferred Alternative (Chapter 8). The Mitigation Monitoring and Reporting Program for the Locally Preferred Alternative, Chapter 8, contains final mitigation measures for the Locally Preferred Alternative; the Mitigation Monitoring and Reporting Program will be approved by the Metro Board of Directors upon certification of this Final EIS/EIR. These mitigation measures will also be included in a Record of Decision subsequently issued by FTA. Metro will formally commit to implement all mitigation measures in the Mitigation Monitoring and Reporting Program for the Locally Preferred Alternative upon certification of this Final EIS/EIR and issuance of the Record of Decision by FTA.

Response to Comment CN2-6

Metro intends to undertake all of the listed activities. The Mitigation Monitoring and Reporting Program for the Locally Preferred Alternative (Chapter 8) of this Final EIS/EIR and Record of Decision to be issued by FTA are the formalized commitments to implement mitigation measures. Metro will involve the community throughout the project process. Based on the refinements to the Locally Preferred Alternative, only the northern portion of the block bounded by 1st Street, Central Avenue, 2nd Street, and Alameda Street would need to be acquired as part of the Locally Preferred Alternative for the 1st/Central Avenue station site. The Señor Fish, Weiland Brewery, associated parking, and the former Café Cuba (The Spice Table) would still need to be displaced. However, the remaining businesses on that block would remain, including the Office Depot and associated parking.

Response to Comment CN2-7

Please refer to Response to Comment CN1-7, above.

Response to Comment CN2-8

This mitigation measure has been recorded in Section 4.17.4.2 of this Final EIS/EIR as one of the mitigation measures suggested by the Little Tokyo community. Metro has identified measures in the Mitigation Monitoring and Reporting Program for the Locally Preferred Alternative (Chapter 8) of this Final EIS/EIR that will provide support for the Little Tokyo businesses. This could take the form of in-kind advertising, Metro-sponsored coupons, city-wide advertising that Little Tokyo is open for business during construction, and similar supportive measures.

Response to Comment CN2-9

As indicated in Section 4.3, Community and Neighborhood Impacts, of the Draft EIS/EIR and this Final EIS/EIR, mitigation to reduce community and neighborhood impacts during construction of the Locally Preferred Alternative involves the development of a community outreach plan to notify local communities of construction schedules, street lane and sidewalk closures, and detours.

In addition, Metro will create a Regional Connector Community Leadership Council, consisting of local business and property owners, to streamline Metro's communication with all communities affected by the project and respond to their concerns during construction of the Locally Preferred Alternative.

JAPANESE AMERICAN CITIZENS LEAGUE

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October 10, 2010

Ms. Dolores Roybal-Saltarelli
Los Angeles County Metropolitan Transportation Authority
One Gateway Plaza, MS 99-22-2
Los Angeles, CA 90012

RE: Comments on Draft EIS/EIR for Regional Connector

Dear Ms. Roybal-Saltarelli:

I speak as a *board member* of the Japanese American Citizens League, Pacific Southwest District. Our organization, as a fellow Little Tokyo community-based nonprofit organization supports the Fully-Underground Regional Connector option as the **ONLY** acceptable alternative for the Metro Regional Connector. We appreciate the continuous dialogue that MTA has engaged in with Little Tokyo nonprofits, residents and small businesses. The positive working relationship and open dialogue have helped the community actively participate in the process to date.

1

The JACL Pacific Southwest District is a member of the Little Tokyo Community Council (LTCC). As an active participant with the LTCC Preservation and Planning Committee as well as the LTCC Transit Committee, we would also like to reiterate the 6 major comments on the Draft EIR/EIS provided by the LTCC:

1) The LTCC strongly supports Metro's finding that "the Draft EIS/EIR does designate the Fully Underground LRT Alternative...as a staff recommended Preferred Alternative based on the technical analysis...and input received from the community." We concur that the Fully Underground Alternative "was developed to best address community concerns simultaneous with cost, operational, and design concerns." Further, the analysis the EIS/EIR shows it is clearly the best performing alternative from a ridership, travel time savings, environmental, cost-effectiveness, and social impact perspective. It is also nearly the cheapest alternative to operate and maintain over time. From the Little Tokyo community perspective, it is the only alternative that adequately addresses our concerns about environmental, economic, social, and cultural impacts to the community. The other alternatives pose significant disproportionate impacts on Little Tokyo.

2

2) The EIS/EIR should correct its assessment of the impacts of the At-Grade Emphasis and Underground Emphasis alternatives. The draft understates the environmental impacts on the Little Tokyo community of the grade separations required along Alameda Street that would physically bisect the Little Tokyo community, potential impacts if tunnel boring were to be initiated from 2nd/Central, and the aesthetic impacts associated with at-grade LRT operations through our community. As such, these two alternatives would place disproportionate burdens on a minority community in the areas of Transit Service Equity Deterioration and Community and Neighborhood Impacts.

3

3) If Metro cannot commit to initiate TBM activities at 2nd/Flower/Hope until Preliminary Engineering is complete, the EIS/EIR should more clearly distinguish the extent and duration of construction impacts that could

4

affect Little Tokyo if boring begins at 2nd /Central. This information is critical to determining whether the community will endure disproportionate impacts during construction activities.

4
cont'd

4) While many mitigation measures are identified throughout the document, the recommendations from the LTCC are segregated as a package of candidate measures to be considered by Metro and FTA. Please confirm the process for approving mitigation measure recommendations and whether this differs from mitigation measures cited elsewhere in the document.

5

5) The LTCC calls for Metro to formalize an agreement with the Little Tokyo community that provides us with a substantial role in decision-making during the Preliminary Engineering, Final Design, and construction phases that addresses:

- Little Tokyo's formal involvement in the development and approval of mitigation measures for the Little Tokyo community,
- Little Tokyo's formal involvement in the monitoring of mitigation measures through the Mitigation Monitoring Plan,
- How to provide a sufficient safety net for Little Tokyo businesses that will be affected during construction,
- Redevelopment of the Office Depot block

6

6) The Draft EIS/EIR does not reflect the language adopted by the LTCC on May 25, 2010 that included refinements to its comments on the pending environmental analysis. These changes stem from additional comments from the Little Tokyo community in late April and amend comments that were transmitted to Metro in our letter dated April 27, 2010. The approved changes are shown in underline.

7

- Expand the safety net for Little Tokyo businesses that will be affected during construction. This can include having Metro provide additional financial and other resources to the community and/or businesses to provide more targeted marketing, as well as financial compensation to local businesses for any loss in gross sales. The process for establishing eligibility, quantifying financial assistance or compensation, and related details would be established jointly between Metro and Little Tokyo stakeholders.

8

- Metro shall work with the Little Tokyo community businesses to ensure no adverse impacts to business operations prior to relocation of or protection of in-place utilities and during construction activities. The LTCC and Metro shall consider establishing a Business Interruption Committee that will streamline Metro's communication with the community and avoid adverse business interruptions. This committee shall include local businesses and property owners.

9

In conclusion, I would like to thank Metro again for their willingness to open the planning process to the community, and strongly hope that such a positive working relationship will continue in the future. Little Tokyo is an important place of history and community for Japanese Americans and everyone else, and ensuring the preservation of Little Tokyo is essential. The Fully Underground alternative is the **only build option** that allows for this, and therefore I urge the MTA Board to select this as the Locally Preferred Alternative.

10

Thank you for your consideration. We look forward to continuing to work with Metro to address appropriate mitigation measures that will address our community's concerns.

Sincerely,

CN3**Responses to Comments from Japanese American Citizens League - Pacific Southwest District, Mayeda, Kelly****Response to Comment CN3-1**

Thank you for your comment. Support for the Fully Underground LRT Alternative is noted. The Metro Board of Directors voted on October 28, 2010 to designate the Fully Underground LRT Alternative as the Locally Preferred Alternative.

Response to Comment CN3-2

Thank you for your comment. Support for the Fully Underground LRT Alternative is noted. Please refer to Responses to Comments CN3-3 through CN3-10, below, for detailed responses to concerns raised by the commenter.

Response to Comment CN3-3

The impacts of the proposed pedestrian bridge and roadway underpass in Little Tokyo were discussed in Sections 4.17.3.3.2 and 4.17.3.4.2 of the Draft EIS/EIR and this Final EIS/EIR, respectively. The potential impacts of beginning tunnel boring machine operations at 2nd and Central were described in Section 4.18.3.4 of the Draft EIS/EIR. Impacts were adequately analyzed in the Draft EIS/EIR. Disproportionate impacts on the Little Tokyo community were analyzed in Section 4.17, Environmental Justice, of the Draft EIS/EIR and this Final EIS/EIR. The Metro Board of Directors voted on October 28, 2010 to designate the Fully Underground LRT Alternative as the Locally Preferred Alternative. The refined Locally Preferred Alternative would not involve construction of any pedestrian bridges or roadway underpasses in Little Tokyo, and would not involve starting tunnel boring machine operations at 2nd and Central. Tunnel boring machine operations would instead begin at the Mangrove property as indicated in Section 4.18, Construction Impacts, of this Final EIS/EIR which is farther from the center of Little Tokyo and would involve fewer impacts.

Response to Comment CN3-4

Please refer to Response to Comment CN1-4, above.

Response to Comment CN3-5

The mitigation measure recommendations were segregated in the Draft EIS/EIR because they are a distinct part of the environmental justice outreach process. Like all other appropriate mitigation measures in the Draft EIS/EIR, feasible measures from the Little Tokyo Working Group recommendations have been incorporated into the Mitigation Monitoring and Reporting Program for the Locally Preferred Alternative (Chapter 8). The Mitigation Monitoring and Reporting Program for the Locally Preferred Alternative, Chapter 8, contains final mitigation measures for the Locally Preferred Alternative; the Mitigation Monitoring and Reporting Program will be approved by the Metro Board of Directors upon certification of this Final EIS/EIR. These mitigation measures will also be included in a Record of Decision subsequently issued by FTA. Metro will formally commit to implement all mitigation measures in the Mitigation Monitoring and Reporting Program for the Locally Preferred Alternative upon certification of this Final EIS/EIR and issuance of the Record of Decision by FTA.

Response to Comment CN3-6

Metro intends to undertake all of the listed activities. The Mitigation Monitoring and Reporting Program for the Locally Preferred Alternative (Chapter 8) of this Final EIS/EIR and Record of Decision to be issued by FTA are the formalized commitments to implement mitigation measures. Metro will involve the community throughout the project process. Based on the refinements to the Locally Preferred Alternative, only the northern portion of the block bounded by 1st Street, Central Avenue, 2nd Street, and Alameda Street would need to be acquired as part of the Locally Preferred Alternative for the 1st/Central Avenue station site. The Señor Fish, Weiland Brewery, associated parking, and the former Café Cuba (The Spice Table) would still need to be displaced. However, the remaining businesses on that block would remain, including the Office Depot and associated parking.

Response to Comment CN3-7

Please refer to Response to Comment CN1-7, above.

Response to Comment CN3-8

This mitigation measure has been recorded in Section 4.17.4.2 of this Final EIS/EIR as one of the mitigation measures suggested by the Little Tokyo community. Metro has identified measures in the Mitigation Monitoring and Reporting Program for the Locally Preferred Alternative (Chapter 8) of this Final EIS/EIR that will provide support for the Little Tokyo businesses. This could take the form of in-kind advertising, Metro-sponsored coupons, city-wide advertising that Little Tokyo is open for business during construction, and similar supportive measures.

Response to Comment CN3-9

Please refer to Response to Comment CN2-9, above.

Response to Comment CN3-10

Thank you for your comment. Metro has met and will continue to meet with the Little Tokyo community groups regarding the Regional Connector Transit Corridor project. Support for the Fully Underground LRT Alternative is noted. The Metro Board of Directors voted on October 28, 2010 to designate the Fully Underground LRT Alternative as the Locally Preferred Alternative.

During preparation of this Final EIS/EIR, Metro held meetings with community groups, which included the Little Tokyo community, and identified municipal leaders to guide them in the decision-making process as it relates to the proposed station locations, alignment options, and anticipated mitigation measures. Input from the community was incorporated into the refinement of the Locally Preferred Alternative and the mitigation measures presented in this Final EIS/EIR.