



WESTSIDE SUBWAY EXTENSION PROJECT

Analysis of Environmental Justice Memorandum



March 2012

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1.0 INTRODUCTION

This memorandum supplements the *Westside Subway Extension Project Analysis of Environmental Justice Technical Report* (the Report) dated August 27, 2010 and supports the Final EIS/EIR. This memorandum updates the analysis in the Environmental Impact/Environmental Consequences Section of the Report to incorporate additional designated Environmental Justice Communities and Communities of Concern based on recent Federal Transit Administration guidance. The analysis has been revised to reflect the inclusion of these additional communities to the affected environment and assess the LPA's transit service benefits, traffic, circulation and parking impacts, displacements and relocations, and economic and fiscal effects on these newly defined communities. Only the LPA (Alternative 2) is included in this memorandum.

Information on regulatory framework, analysis methodology and existing conditions/affected environment can be found in the *Westside Subway Extension Project Analysis of Environmental Justice Technical Report*.

2.0 PROJECT DESCRIPTION

On October 28, 2010, the Metro Board selected the Westwood/VA Hospital Extension (Alternative 2 in the Draft EIS/EIR) as the Locally Preferred Alternative (LPA) and authorized the preparation of the *Westside Subway Extension Final EIS/EIR* (the Final EIS/EIR) to analyze the LPA. This alternative would extend HRT, in subway, approximately nine-miles from the existing Metro Purple Line Wilshire/Western Station to a Westwood/VA Hospital Station. The extension would include a total of seven new stations:

- Wilshire/La Brea
- Wilshire/Fairfax
- Wilshire/La Cienega
- Wilshire/Rodeo
- Century City (Century City Santa Monica or Century City Constellation)
- Westwood/UCLA (Westwood/UCLA On-Street or Westwood/UCLA Off-Street)
- Westwood/VA Hospital (Westwood/VA Hospital South or Westwood/VA Hospital North)

The estimated one-way running time for the project would be approximately 15 minutes from the Wilshire/Western Station to the Westwood/VA Hospital Station. The extension would operate at headways of 4 minutes during peak periods and 10 minutes during off-peak periods. As part of the project, Metro is also planning several enhancements to the Division 20 Maintenance and Storage Facility.

The construction schedule for the Project is partially dependent on the timing of Federal funding availability. Two LPA construction scenarios are considered. Both scenarios will contain the same elements with differences only in the timing of when they are built and operational. The first construction scenario assumes that under the America Fast Forward (30/10) Scenario (Concurrent Construction), the LPA would open in its entirety to the Westwood/VA Hospital Station in 2022 with the three construction segments built concurrently (Wilshire/Western to Wilshire/La Cienega,

Wilshire/La Cienega to Century City and Century City to Westwood/VA Hospital). The second construction scenario assumes that under the Metro Long Range Transportation Plan (LRTP) Scenario (Phased Construction), the LPA would open in three consecutive phases (Phase 1 to Wilshire/La Cienega, Phase 2 to Century City, and Phase 3 to Westwood/VA Hospital), with the entire LPA operational to the Westwood/VA Hospital Station in 2036.

A detailed description of the LPA is provided in Chapter 2 of the Final EIS/EIR.

3.0 REGULATORY FRAMEWORK

Guidance from the United States Department of Transportation has been incorporated into the analysis and used to identify Environmental Justice Communities. According to this guidance, “minority populations should be identified when the minority population of the affected area exceeds 50 percent or when the minority population percentage of the affected area is less than 50 percent but is meaningfully greater than the minority population percentage in the general population or other appropriate unit of geographic analysis.” The FTA guidance also requires a separate minority analysis of neighborhoods and communities in addition to the aggregate analysis.

4.0 METHODOLOGY

Previously, the unit of geographic analysis used for Environmental Justice was the jurisdiction in which a neighborhood or community was located (i.e., City of Los Angeles, City of Santa Monica). However, to provide a meaningful comparison, the geographic unit has been narrowed to the County of Los Angeles (County). Since the Metro service area spans through the entire County, the County of Los Angeles has been used as the basis of comparison for all neighborhoods and communities within the Study Area.

The United States Census data available when the Draft EIS/EIR was circulated was from the year 2000. During the preparation of the Final EIS/EIR, 2010 Census data became available and this data was analyzed to validate that the 2000 Census data.

The 2010 Census data shows an overall decrease in EJ populations within the Study Area. Compared to the 2000 Census data, the total minority population for the Study Area decreased by 0.2 percent, the Hispanic population for the Study Area decreased by 1.8 percent and the percentage of people below poverty decreased by 1.2 percent. There were two communities where the percentages increased by more than five percent from the 2000 Census data. The Unincorporated County of Los Angeles Veterans Affairs West Los Angeles Campus (VA Hospital Campus) showed a 29.3 percent increase in persons below poverty. However, this community was previously defined as an EJ community due to the high percentage of population below poverty and total minority population over 50 percent. The Rancho Park community showed a 7.6 percent increase in total minority population. However, its total 27 percent minority population is still well below the 50 percent threshold and this community would not be identified as an EJ community.

Based on FTA guidelines, three communities (Larchmont, Miracle Mile, and West Los Angeles) that were defined as EJ communities by the 2000 Census data would no longer be identified as EJ communities by the 2010 Census data. Because the 2000 data defines more EJ communities than the 2010 data, the 2000 data represents a more conservative evaluation of EJ communities and is used in the analysis of Environmental Justice impacts in order to provide a consistent evaluation.

5.0 AFFECTED ENVIRONMENT

In accordance with the FTA guidance, in addition to the analysis of the minority populations performed in aggregate (as summarized in Table 5-1), a separate analysis showing the unique minority populations within the Study Area was also performed (Table 5-2).

The communities of Olympic Park and Wilshire Center/Koreatown have the largest minority population in the Study Area (92 percent each), relative to the County of Los Angeles minority population (71 percent). The third largest minority population is located in the Wilshire Park community (84 percent).

The portion of the unincorporated County located in the Study Area, which includes the VA Hospital Campus, has the highest population living below poverty level (53 percent), which is substantially higher than the population living below poverty level Countywide (15 percent). Wilshire Center/Koreatown has the second largest population living below poverty at 30 percent.

Based on FTA Guidance, the following list is the complete list of communities identified as Environmental Justice Communities (EJ communities), as shown in Table 5-2.

- **Unincorporated County of Los Angeles -Veterans Affairs West Los Angeles Campus (VA Hospital Campus).** A summary of the demographic and socioeconomic characteristics of the VA Hospital Campus are shown in Table 5-1. The VA Hospital Campus has a population of approximately 670 persons. With an area of 0.9 square miles, the population density of the VA Hospital Campus is 740 persons per square mile. Approximately 54 percent of the households in the VA Hospital Campus live below the poverty level and approximately 54 percent of the VA Hospital Campus population is characterized as minority, with the largest minority population being African American (approximately 44 percent of the total population). The percentage of Limited English Proficiency (LEP) persons in the VA Hospital Campus is 1 percent of the total population. Although the population of the VA Hospital Campus contains one of the smallest populations, it has significant proportions of minority and low-income populations and, therefore, it would be considered an EJ community.
- **Hollywood, City of Los Angeles.** A summary of the demographic and socioeconomic characteristics of Hollywood is shown in Table 5-1. Hollywood has a population of approximately 51,190 persons. With an area of 2.4 square miles, the population density of Hollywood is 21,328 persons per square mile. Approximately 22 percent of the households in Hollywood live below the poverty level and approximately 50 percent of Hollywood's population is characterized as minority, with the largest minority population being Hispanic or Latino (approximately 34 percent of the total population). The percentage of LEP population in Hollywood is 18 percent of the total population. Because Hollywood contains a higher proportion of a low-income population relative to Los Angeles County, and a minority population of greater than 50 percent, it is considered an EJ community.

Table 5-1: Summary Demographic and Socioeconomic Characteristics of Communities within the Study Area Boundaries

Community	Environmental Justice (EJ) Community*	Percent Total Minority*	Median Household Income ⁺¹	Percent Population Living Below Poverty Level ⁺²	Percent Limited English Proficiency Population Over 5 Years Old ⁺³
County of Los Angeles		71%	\$55,192	15%	27%
VA Hospital Campus	Yes	54.4%	\$42,391	53.7%	0.8%
City of Los Angeles					
Brentwood	No	15.7%	\$88,263	6.5%	1.9%
Carthay	No	37.9%	\$54,112	12.4%	7.8%
Century City	No	14.8%	\$93,353	8.7%	2.3%
Hancock Park	No	26.2%	\$90,246	7%	4.6%
Hollywood	Yes	50.2%	\$26,699	22.4%	18.1%
Larchmont	Yes	57.3%	\$86,442	3.2%	4.7%
Mid-City West/Fairfax	No	24.9%	\$49,726	11.5%	6.0%
Miracle Mile	Yes	50.8%	\$46,538	8.4%	4.9%
Olympic Park	Yes	92.4%	\$33,306	23.3%	28.5%
Pico Los Angeles	Yes	76.0%	\$41,816	13.7%	3.6%
Rancho Park	No	19.4%	\$74,859	7.1%	2.4%
South Robertson	No	22.9%	\$49,294	12.8%	8.5%
West Los Angeles	Yes	50.1%	\$40,748	18.2%	12.0%
Westwood	Yes	34.6%	\$66,356	22.4%	3.6%
Wilshire Center/Koreatown	Yes	92.3%	\$25,603	29.9%	37%
Wilshire Park	Yes	84.0%	\$44,647	20.2%	24.4%
Windsor Square	Yes	73.8%	\$73,954	8%	15%
City of Beverly Hills					
City of Beverly Hills within Study Area	No	18.7%	\$97,726	9.5%	5.9%
City of Santa Monica					
City of Santa Monica within Study Area	No	29.3%	\$67,540	11.2%	4.9%
Pico Santa Monica	Yes	63.1%	\$36,728	17.8%	10.6%
City of West Hollywood					
City of West Hollywood within Study Area	No	18.8%	\$41,550	11.5%	10.5%

^{+Source:} U.S. Census Bureau, 2000, 2000 U.S. Census Summary File 3, Tables P7, P8, P20, and P87

^{*Source:} U.S. Census Bureau, 2008, 2008 American Community Survey

1 Median income was determined by averaging the median income of Census Block Groups that were one-quarter mile away from each station area.

2 Poverty status is based upon 2008 U.S. Census Poverty Thresholds

3 Persons counted as Limited English Proficiency (LEP) are those over the age of 5 who speak a non-English language at home and falls into the Census English speaking ability categories of "Speak English Not Well" or "Speak English Not At All."

Table 5-2 Unique Minority Populations of Communities within the Study Area

Community	EJ Population Criteria (Aggregate Minority or Individual Minority)	Percent Black or African American	Percent Asian	Percent Hispanic or Latino	Total Percent Minority
County of Los Angeles		8.6%	12.8%	47.3%	71.0%
VA Hospital Campus	Individual Minority and Aggregate Minority	44.0%	0.0%	6.9%	54.4%
City of Los Angeles					
Brentwood	No	1.3%	6.4%	4.5%	15.7%
Carthay	No	9.1%	5.9%	17.8%	37.9%
Century City	No	2.3%	8.3%	2.5%	14.8%
Hancock Park	No	3.9%	11.4%	6.9%	26.2%
Hollywood	Aggregate Minority	5.9%	6.5%	33.6%	50.2%
Larchmont	Individual Minority and Aggregate Minority	0.0%	36.9%	17.2%	57.3%
Mid-City West/Fairfax	No	4.1%	10.4%	6.3%	24.9%
Miracle Mile	Individual Minority and Aggregate Minority	18.6%	17.2%	11.2%	50.8%
Olympic Park	Individual Minority and Aggregate Minority	15.3%	27.0%	48.0%	92.4%
Pico Los Angeles	Individual Minority and Aggregate Minority	47.9%	5.8%	17.2%	76.0%
Rancho Park	No	1.7%	9.4%	5.1%	19.4%
South Robertson	No	2.6%	4.9%	5.8%	22.9%
West Los Angeles	Individual Minority and Aggregate Minority	2.5%	19.7%	22.3%	50.1%
Westwood	Individual Minority	2.1%	20.8%	6.8%	34.6%
Wilshire Center/Koreatown	Individual Minority and Aggregate Minority	5.3%	40.1%	44.4%	92.3%
Wilshire Park	Individual Minority and Aggregate Minority	10.0%	39.9%	32.0%	84.0%
Windsor Square	Individual Minority and Aggregate Minority	5.0%	38.9%	27.3%	73.8%
City of Beverly Hills					
City of Beverly Hills within Study Area	No	1.4%	7.9%	4.6%	18.7%
City of Santa Monica					
City of Santa Monica within Study Area	No	3.7%	7.3%	14.0%	29.3%
Pico Santa Monica	Individual Minority and Aggregate Minority	11.0%	7.7%	38.7%	63.1%
City of West Hollywood					
City of West Hollywood within Study Area	No	2.8%	3.9%	9.0%	18.8%

Source: U.S. Census Bureau, 2000

Bold Number: Exceeds threshold to qualify as Environmental Justice Population

- Larchmont, City of Los Angeles (Larchmont).** A summary of the demographic and socioeconomic characteristics of Larchmont is shown in Table 5-1. Larchmont has a population of approximately 470 persons. With an area of 0.1 square miles, the population density of Larchmont is 4,660 persons per square mile. Approximately 3 percent of the households Larchmont live below the poverty level and approximately 57 percent of Larchmont's population is characterized as minority, with the largest minority population being Asian (approximately 37 percent of the total population). The percentage of LEP population in Larchmont is 5 percent of the total population.

Because of the high percentage of the Asian population, and because the total minority population is greater than 50 percent, it is considered an EJ community.

- **Miracle Mile, City of Los Angeles (Miracle Mile).** A summary of the demographic and socioeconomic characteristics of Miracle Mile is shown in Table 5-1. Miracle Mile has a population of approximately 6,415 persons. With an area of 0.4 square miles, the population density of Miracle Mile is 16,040 persons per square mile. Approximately 8 percent of the households in Miracle Mile live below the poverty level and approximately 51 percent of Miracle Mile's population is characterized as minority, with the largest minority population being African American (approximately 18 percent of the total population). The second largest minority population is Asian (approximately 17 percent of the total population). The percentage of LEP persons in Miracle Mile is 5 percent of the total population. Because the Miracle Mile contains a minority population greater than 50 percent and a higher percentage of Black or African American and Asian minorities in comparison to the County of Los Angeles, it is considered an EJ community.
- **Olympic Park, City of Los Angeles (Olympic Park).** A summary of the demographic and socioeconomic characteristics of Olympic Park is shown in Table 5-1. Olympic Park has a population of approximately 26,565 persons. With an area of 1.2 square miles, the population density of Olympic Park is 22,137 persons per square mile. Approximately 23 percent of the households in Olympic Park live below the poverty level and approximately 92 percent of Olympic Park's population is characterized as minority, with the minority populations being Hispanic or Latino (approximately 48 percent of the total population), Asian (approximately 27 percent), and Black or African American (approximately 15 percent). The percentage of LEP persons in Olympic Park is 29 percent of the total population. Olympic Park contains higher proportions of minority and low-income populations in comparison to Los Angeles County, and, therefore, it is considered an EJ community.
- **Pico, City of Los Angeles (Pico Los Angeles).** A summary of the demographic and socioeconomic characteristics of Pico Los Angeles are shown in Table 5-1. Pico Los Angeles has a population of approximately 12,547 persons. With an area of 3.5 square miles, the population density of Pico Los Angeles is 3,585 persons per square mile. Approximately 14 percent of the households in this district live below the poverty level and approximately 76 percent of Pico Los Angeles's population is characterized as minority, with the largest minority population being African American (approximately 48 percent of the total population). The percentage of LEP persons in the Pico Los Angeles is 4 percent of the total population. The Pico Los Angeles contains a higher proportion of minority populations in comparison to Los Angeles County, and, therefore, it is considered an EJ community.
- **Pico, City of Santa Monica (Pico Santa Monica).** A summary of the demographic and socioeconomic characteristics of the Pico Santa Monica is shown in Table 5-1. Pico Santa Monica has a population of approximately 13,270 persons. With an area of 1.5 square miles, the population density of the Pico Santa Monica is 8,846 persons per square mile. Approximately 18 percent of the households in Pico Santa Monica live below the poverty level and approximately 63 percent of this district's population is characterized as minority, with the largest minority population being Hispanic or Latino (approximately 39 percent of the total population) and a Black or African American population of 11 percent (greater than the 8.6 percent Los Angeles County average). The percentage of LEP persons in Pico Santa Monica is 11 percent of the total population. Pico Santa Monica contains a higher proportion of minority and low-income populations in comparison to Los Angeles County. Therefore, it is considered an EJ community.

- **West Los Angeles, City of Los Angeles (West Los Angeles).** A summary of the demographic and socioeconomic characteristics of West Los Angeles is shown in Table 5-1. West Los Angeles has a population of approximately 28,475 persons. With an area of 1.9 square miles, the population density of West Los Angeles is 14,986 persons per square mile. Approximately 18 percent of the households in West Los Angeles live below the poverty level and approximately 50 percent of West Los Angeles's population is characterized as minority, with the largest minority population being Hispanic or Latino (approximately 22 percent of the total population) and an Asian population of approximately 20 percent (greater than the 12.8 percent Los Angeles County average). The percentage of LEP persons in West Los Angeles is 12 percent of the total population. Because West Los Angeles contains a minority population greater than 50 percent and a higher Asian minority and low-income population in comparison to Los Angeles County, it is considered an EJ community.
- **Westwood, City of Los Angeles (Westwood).** A summary of the demographic and socioeconomic characteristics of Westwood is shown in Table 5-1. Westwood has a population of approximately 58,745 persons. With an area of 4.6 square miles, the population density of Westwood is 12,771 persons per square mile. Approximately 22 percent of the households in Westwood live below the poverty level and approximately 35 percent of Westwood's population is characterized as minority, with the largest minority population being Asian (approximately 21 percent of the total population). Two of the seven census tracts in this area contain a large proportion of students on or adjacent to the UCLA campus who have lower incomes and a high percentage of Asian population. This cluster of students has an average income of \$18,442 and represents of 58 percent of the total Asian population for the district. The percentage of LEP persons in Westwood is 4 percent of the total population. Westwood contains a higher proportion of low-income and Asian minority populations in comparison to Los Angeles County, and therefore, it is considered an EJ community.
- **Wilshire Center/Koreatown, City of Los Angeles (Wilshire Center/Koreatown).** A summary of the demographic and socioeconomic characteristics of Wilshire Center/Koreatown is shown in Table 5-1. Wilshire Center/Koreatown has a population of approximately 55,115 persons. With an area of 1.2 square miles, the population density of Wilshire Center/Koreatown is 42,609 persons per square mile. Approximately 30 percent of the households in Wilshire Center/Koreatown live below the poverty level and approximately 92 percent of Wilshire Center/Koreatown's population is characterized as minority, with the largest minority population being Hispanic or Latino (approximately 44 percent of the total population) and an Asian population of 40 percent (greater than the 12.8 percent Los Angeles County average). The percentage of LEP persons in Wilshire Center/Koreatown is 37 percent of the total population. Wilshire Center/Koreatown contains a higher proportion of minority and low-income, and LEP populations in comparison to Los Angeles County, and, therefore, it is considered an EJ community and a community of concern.
- **Wilshire Park, City of Los Angeles (Wilshire Park).** A summary of the demographic and socioeconomic characteristics of Wilshire Park is shown in Table 5-1. Wilshire Park has a population of approximately 15,272 persons. With an area of 4.55 square miles, the population density of Wilshire Park is 3,359 persons per square mile. Approximately 20 percent of the households in Wilshire Park live below the poverty level and approximately 84 percent of Wilshire Park's population is characterized as minority, with the largest minority population being Asian (approximately 40 percent of the total population, greater than the 12.8 percent Los Angeles County average). The Wilshire Park District also contains an African American population of 10 percent, greater than the 8.6 percent Los Angeles County average. The

percentage of LEP persons in Wilshire Park is 24 percent of the total population. Wilshire Park contains a higher proportion of minority and low-income populations in comparison to Los Angeles County, and, therefore, it is considered an EJ community.

- **Windsor Square, City of Los Angeles (Windsor Square).** A summary of the demographic and socioeconomic characteristics of Windsor Square is shown in Table 5-1. Windsor Square has a population of approximately 4,704 persons. With an area of 3.4 square miles, the population density of Windsor Square is 1,384 persons per square mile. Approximately 8 percent of the households in Windsor Square live below the poverty level and approximately 74 percent of Windsor Square's population is characterized as minority, with the largest minority population being Asian (approximately 39 percent, greater than the 12.8 percent Los Angeles County average). The percentage of LEP in Windsor Square is 15 percent. Windsor Square contains a higher proportion of a minority population in comparison to Los Angeles County, and, therefore, it is considered an EJ community.

As described above, the following 12 communities have been identified as EJ communities because of their high proportions of minority and/or low-income populations in comparison to the surrounding community:

- VA Hospital Campus
- Hollywood
- Larchmont
- Miracle Mile
- Olympic Park
- Pico Los Angeles
- Pico Santa Monica
- West Los Angeles
- Westwood
- Wilshire Center/Koreatown
- Wilshire Park
- Windsor Square

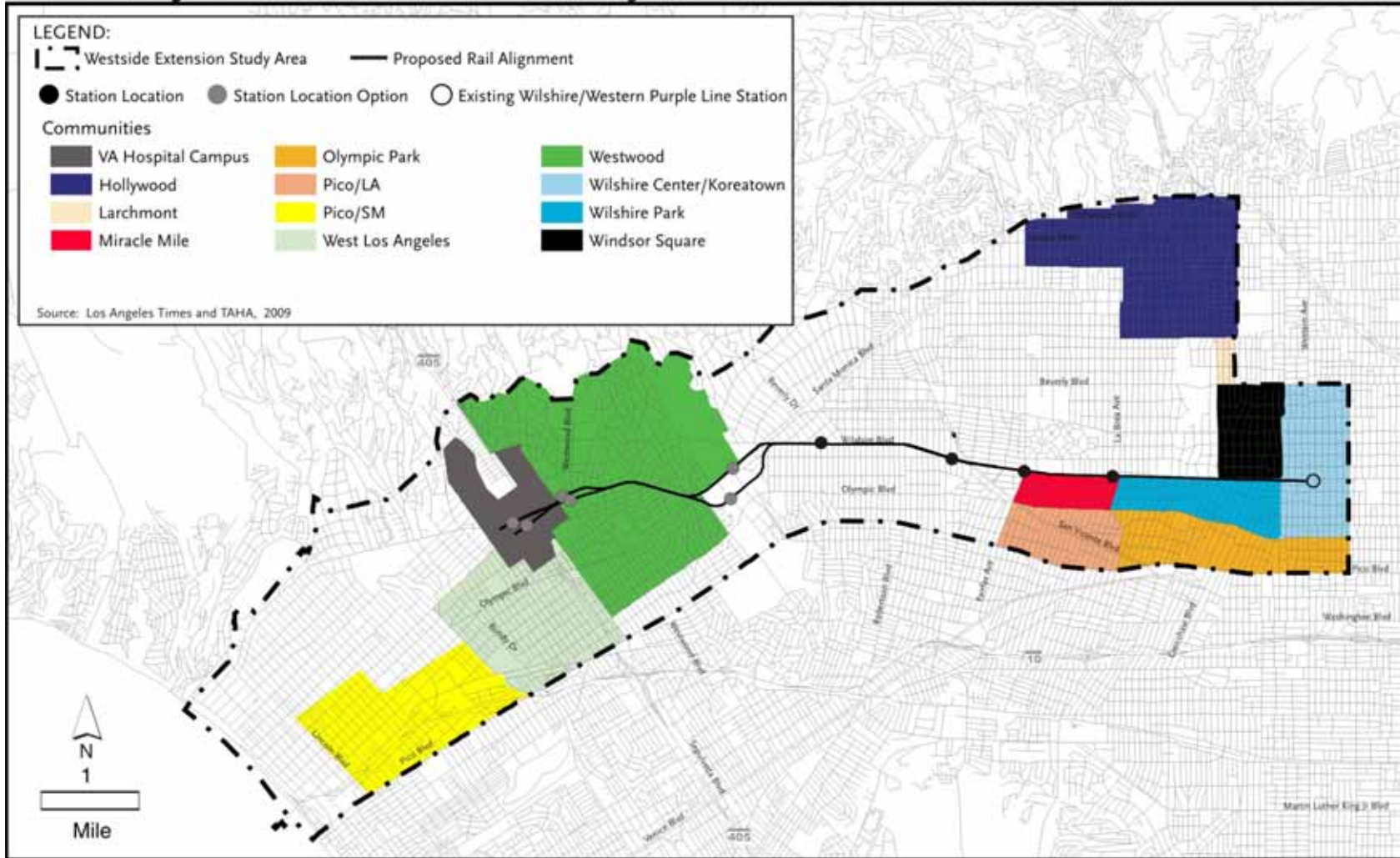
In addition to being identified as an EJ community, Wilshire Center/Koreatown was identified as a community of concern due to the higher proportion of Limited English Proficiency (LEP) populations in comparison to the surrounding community.

5.1 Racial and Ethnic Characteristics of the Environmental Justice Communities and Communities of Concern

All identified EJ communities and communities of concern are shown in Figure 5-1 and the demographic breakdown is listed in Table 5-3.

Figure 5-1: Environmental Justice Populations and Communities of Concern

Environmental Justice Communities and Communities of Concern



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Table 5-3: Racial and Ethnic Character of the EJ Communities and Communities of Concern within Study Area

EJ Community*	Population by Race/Ethnicity (Persons)					Percent Minority
	White	Black or African American	Asian	Hispanic or Latino	Other Races ¹	
County of Los Angeles						
VA Hospital Campus (M, P)	304	293	0	46	26	54.4%
City of Los Angeles						
Hollywood (M, P)	25,509	3,034	3,333	17,181	2,131	50.2%
Larchmont (M)	199	0	172	80	15	57.3%
Miracle Mile (M)	3,156	1,196	1,102	720	241	50.8%
Olympic Park (M, P, L)	2,007	4,060	7,170	12,738	589	92.4%
Pico Los Angeles (M)	3,009	6,006	726	2,160	646	76.0%
West Los Angeles (M, P)	14,210	703	5,608	6,361	1,594	50.1%
Westwood (P)	38,401	1,238	12,207	3,994	2,905	34.6%
Wilshire Center/Koreatown (M, P, L)	4,254	2,924	22,110	24,497	1,331	92.3%
Wilshire Park (M, P)	2,439	1,522	6,092	4,893	326	84.0%
Windsor Square (M)	3,736	709	5,559	3,893	375	73.8%
City of Santa Monica						
Pico Santa Monica (M, P)	4,898	1,466	1,027	5,139	739	63.1%

Source: U.S. Census Bureau, 2000, 2000 U.S. Census Summary File 3, Table P7.

*M: Minority Designated EJ Community, P: Poverty Designated EJ Community, L: Limited English Proficiency Designated Community of Concern.

¹The "Other Races" category includes American Indian and Alaska Native, Native Hawaiian and Other Pacific Islander, Some Other Race, and Two or more Races Census Categories.

Eleven communities within the Study Area were identified as EJ communities due to substantially higher minority in comparison to the surrounding community (County of Los Angeles).

- VA Hospital Campus
- Hollywood
- Larchmont
- Miracle Mile
- Olympic Park
- Pico Los Angeles
- West Los Angeles
- Wilshire Center/Koreatown
- Wilshire Park
- Windsor Square
- Pico Santa Monica

5.2 Economic Characteristics of the Environmental Justice Communities and Communities of Concern

The detailed economic characteristics of all identified EJ communities and communities of concern are shown in Table 5-4.

Eight communities within the Study Area were identified as EJ communities due to substantially higher poverty levels in comparison to the County of Los Angeles.

- VA Hospital Campus
- Hollywood
- Olympic Park
- West Los Angeles
- Westwood
- Wilshire Center/Koreatown
- Wilshire Park
- Pico Santa Monica

As shown in Table 5-4, Wilshire Center/Koreatown had the lowest median household income of the EJ communities or communities of concern (\$25,603). The median income for the Los Angeles County is substantially higher (\$55,192). The portion of unincorporated County of Los Angeles located in the Study Area, which includes the VA Hospital Campus, has the highest portion of its population living below poverty level (54 percent), substantially higher than the population living below poverty level for the County (15 percent). The second largest population living below poverty is located in Wilshire Center/Koreatown. Additionally, the Wilshire Center/Koreatown has the greatest number of transit dependent households of the EJ communities or communities of concern (28 percent).

Table 5-4: Economic Character of the EJ Communities and Communities of Concern within Study Area

EJ Community or Community of Concern*	Median Household Income ¹	Percent Population Living Below Poverty Level ²	Percent Population Transit-Dependent
County of Los Angeles			
VA Hospital Campus(M, P)	\$42,391	53.7%	0.0%
City of Los Angeles			
Hollywood (M, P)	\$26,699	22.4%	25.6%
Larchmont (M)	\$86,442	3.2%	5.2%
Miracle Mile (M)	\$46,538	8.4%	16.8%
Olympic Park (M, P, L)	\$33,306	23.3%	23.5%
Pico Los Angeles (M)	\$41,816	13.7%	12.1%
West Los Angeles (M, P)	\$40,748	18.2%	11.9%
Westwood (P)	\$25,603	22.4%	7.8%
Wilshire Center/Koreatown (M, P, L)	\$25,603	29.9%	27.6%
Wilshire Park (M, P)	\$44,647	20.2%	19.3%
Windsor Square (M)	\$73,954	20.4%	13.1%
City of Santa Monica			
Pico Santa Monica (M, P)	\$36,728	17.8%	18.3%

Source: U.S. Census Bureau, 2000.

*M: Minority designated EJ Community, P: Poverty Designated EJ Community, L: Limited English Proficiency designated community of concern.

¹ The Median Income was determined by averaging the median income of Census Block Groups that were one-quarter mile away from each station area.

² Poverty Status is based upon threshold as defined in the Westside Subway Extension Environmental Justice Technical Report.

5.3 Limited English Proficiency (LEP) of the Environmental Justice Communities and Communities of Concern

The detailed LEP characteristics of all identified EJ communities and communities of concern are shown in Table 5-5 .

Two communities within the Study Area were identified as EJ communities due to a substantially higher LEP population in comparison to the County of Los Angeles (27 percent).

- Wilshire Center/Koreatown
- Olympic Park

As shown in Table 5-5, Wilshire Center/Koreatown has the largest Limited English Proficiency (LEP) population of the EJ communities or communities of concern (37 percent), substantially higher than Los Angeles County’s LEP population of 27 percent, and the City’s LEP population of 31 percent. Olympic Park (28.5 percent) also has a higher percentage of LEP population than the County of Los Angeles.

Table 5-5: Limited English Proficiency in the EJ Communities and Communities of Concern within Study Area

EJ Community or Community of Concern*	Limited English Proficiency (LEP) Over 5 Years Old ¹					Percent Not LEP ²
	Spanish	Asian or Pacific Language	Other Languages	Total Population of LEP1	Percent of Total Population	
County of Los Angeles						
VA Hospital Campus (M, P)	5	--	--	5	0.8%	99.2%
City of Los Angeles						
Hollywood (M, P)	4,899	674	3,266	8,839	18.2%	81.9%
Larchmont (M)	5	12	4	21	4.7%	95.3%
Miracle Mile (M)	82	159	60	301	4.9%	95.1%
Olympic Park (M, P, L)	4,670	2,310	50	7,030	28.5%	71.5%
Pico Los Angeles (M)	335	43	54	432	3.6%	96.4%
West Los Angeles (M, P)	1,977	603	724	3,304	12.0%	88.0%
Westwood (P)	352	624	1,076	2,052	3.6%	96.4%
Wilshire Center/Koreatown (M, P, L)	10,284	8,077	358	18,719	36.8%	63.2%
Wilshire Park (M, P)	1,615	1,849	40	3,504	24.4%	75.6%
Windsor Square (M)	1,193	1,755	59	3,007	22.6%	77.4%
City of Santa Monica						
Pico Santa Monica (M, P)	1,084	138	119	1,341	10.6%	89.4%

Source: U.S. Census Bureau, 2008, 2008 American Community Survey

*M: Minority designated EJ Community, P: Poverty Designated EJ Community, L: Limited English Proficiency designated community of concern.

¹ A person that is Limited English Proficiency (LEP) would have some difficulty speaking English. Persons counted as LEP are those over the age of 5 years old, who speak a non-English language at home, and falls into the Census English speaking ability categories of "Speak English Not Well" or "Speak English Not At All".

6.0 ENVIRONMENTAL IMPACT/ENVIRONMENTAL CONSEQUENCES

This EJ analysis follows a five-step process (Benefits and Burdens Analysis) to determine whether disproportionately high and adverse human health or environmental impacts exist.

- (1) Whether a high or substantial impact exists which adversely affects an EJ community;
- (2) Whether effects on EJ populations exceed those borne by non-EJ community;
- (3) Whether cumulative or indirect effects would adversely affect an EJ community;
- (4) Whether mitigation and enhancement measures will be taken; and
- (5) Whether there are off-setting benefits to EJ community.

Detailed impacts are described in Chapter 3.0 and 4.0 of the Final EIS/EIR. Section 6.0 of this memorandum addresses step one of the process and determines what specific adverse effects are occurring to EJ communities and whether those adverse effects are high and substantial. Impacts to EJ communities that are determined to be high and substantial are then carried through the

subsequent steps of the Benefits and Burdens analysis, and presented in Section 7.0 of this memorandum. A summary of adverse effects to EJ and non-EJ communities is provided in Section 7.0 to compare the differences between EJ and non-EJ communities.

6.1 No Build

A discussion of the No Build Alternative is provided in Section 6.1 of the *Westside Subway Extension Project Analysis of Environmental Justice Technical Report*.

6.2 Locally Preferred Alternative—Westwood/VA Hospital Extension

Since the circulation of the Draft EIS/EIR, an LPA has been selected by the Metro Board of Directors. Based on proximity to the alignment and proposed station areas, six of the 12 EJ communities would be directly affected by the project.

- Miracle Mile
- Westwood
- Wilshire Center/Koreatown
- Wilshire Park
- Windsor Square
- VA Hospital Campus

For comparison, there would be five non-EJ communities that would be directly affected by the project.

- Beverly Hills
- Carthay
- Century City
- Hancock Park
- Mid-City West/Fairfax

The LPA could either be constructed as a single phase under the Concurrent Construction Scenario or as three consecutive phases under the Phased Construction Scenario. The opening of the LPA as a single phase or in three sequential phases will not result in differing adverse impacts to EJ communities. Both construction scenarios are discussed in this section. Under the Phased Construction Scenario, potential impacts to EJ communities are the same as under the Concurrent Construction Scenario. The only difference between the two scenarios is the timing of when potential impacts will occur. Under the Phased Construction Scenario, potential impacts along Phase 2 and Phase 3 will occur later than under the Concurrent Construction Scenario due to an extended construction timeline. The timing for potential impacts along Phase 1 of the LPA will occur earlier than under the Concurrent Construction Scenario since Phase 1 will open for operation in 2020.

Under the phased construction, benefits to the communities in Phases 2 and 3 would be delayed until construction of those phases would be complete. This would delay benefits for two non-EJ

communities (Beverly Hills and Century City) in Phase 2 and two EJ communities (Westwood and VA Hospital Campus) in Phase 3.

Under the LPA, the construction and operation of the project would not result in adverse impacts to minority and/or low-income communities in the following environmental impact areas:

- Geology and soils
- Hazardous Materials
- Water Quality
- Energy
- Historic, Archaeological, and Paleontological Resources
- Parklands, Community Facilities, and Other Section 4(f) Properties
- Safety and Security

Project Impacts

Many of the neighborhoods along the alignment are characterized by retail and commercial uses on Wilshire Boulevard, with primarily single-family residential uses located behind commercial uses and beyond Wilshire Boulevard to the north and south. During construction, an increase in traffic as a result of construction activities will affect the residential character of some neighborhoods. Street closures are expected to temporarily impact mobility and access to the community facilities described previously, as much of the construction activity would be centered on Wilshire Boulevard, a central point of access for the neighborhoods. As a result, it will be more difficult to access some community resources, such as churches and museums located along Wilshire and Santa Monica Boulevards. In addition, construction activities will also reduce on-street and off-street parking. This will affect the existing businesses as customers may choose to avoid ongoing construction and construction zones.

After the project is constructed, it is anticipated that the LPA would provide beneficial direct impacts for minority and low income communities that are typically transit dependent and would provide increased mobility and regional connectivity throughout the region. The mobility and connectivity objectives of the project are described in detail in the Purpose and Need chapter of the Final EIS/EIR.

The specific construction and operations impacts to communities are discussed in the following sections:

- Traffic, Circulation and Parking
- Displacement and Relocation
- Visual Resources and Aesthetics
- Air Quality and Climate Change
- Noise and Vibration
- Economic Vitality and Employment Opportunities

Because the LPA would be entirely grade separated and located below ground, impacts will occur primarily during construction and will be concentrated within 500 feet (construction impact zone) of the proposed station locations and staging areas. Construction activity would also occur at the existing Division 20 maintenances as upgrades are made to the facility to support the proposed project. However, this site is located in an industrial area and there are no sensitive receptors or community facilities within close proximity (0.25 miles). Therefore, no adverse effects to EJ communities would occur. The following breakdown shows the EJ and non-EJ communities by station and staging area:

Wilshire/Western Staging Area (Phase 1)
EJ Communities

Wilshire Center/Koreatown

Non-EJ Communities

None

Wilshire/Crenshaw Staging Area (Phase 1)
EJ Communities

Wilshire Park

Windsor Square

Non-EJ Communities

None

Wilshire/La Brea Station (Phase 1)
EJ Communities

Miracle Mile

Wilshire Park

Non-EJ Communities

Hancock Park

Mid-City West/Fairfax

Wilshire/Fairfax Station (Phase 1)
EJ Communities

Miracle Mile

Non-EJ Communities

Mid-City West/Fairfax

Carthay

Wilshire/La Cienega Station (Phase 2)
EJ Communities

None

Non-EJ Communities

Beverly Hills

Wilshire/Rodeo Station (Phase 2)
EJ Communities

None

Non-EJ Communities

Beverly Hills

Century City Station (Phase 2)
EJ Communities

None

Non-EJ Communities

Century City

Westwood/UCLA Station (Phase 3)
EJ Communities

Westwood

Non-EJ Communities

None

Westwood VA Hospital Station (Phase 3)
EJ Communities

VA Hospital Campus

Non-EJ Communities

None

The first two stations (Phase 1) are located in a relatively equal mix of EJ and non-EJ communities. The middle two stations (Phase 2) are located in two non-EJ communities. The last two stations (Phase 3) are located in two EJ communities. The two staging areas are located in three EJ communities. Overall the geographic distribution of station construction zones and staging areas affects almost an equal number of EJ (6) and non-EJ (5) communities.

The impacts for each environmental resource prior to implementation of mitigation are summarized in Table 6-1, and the specific effects to the individual EJ communities and non-EJ communities are

described in detail below. After a description of the specific impacts by topic area, mitigation is identified to reduce the impacts. If there are still impacts remaining, additional mitigation is identified to reduce the impact to an EJ community. For impacts to EJ communities that remain after implementation of all feasible mitigation, the determination of whether the impacts are borne disproportionately by an EJ community is assessed in Section 7.0 of this memorandum.



Table 6-1. Impacts without Mitigation by Environmental Resource to EJ Communities During Construction and Operation

Station/ Staging Area	Communities Present (EJ/non-EJ)	Traffic, Circulation, Parking	Displace- ment and Relocation	Visual Resources	Air Quality	Noise and Vibration	Economic and Fiscal	Impact to EJ Community
Wilshire/Western Staging Area								
Construction	Wilshire Center/Koreatown (EJ)	●	○	●	●	●	●	Yes
Operation		○	○	○	○	○	○	No
Wilshire/Crenshaw Staging Area								
Construction	Wilshire Park and Windsor Square (EJ)	●	○	●	●	●	●	Yes
Operation		○	○	○	○	●	○	Yes
Wilshire/La Brea Station								
Construction	Miracle Mile and Wilshire Park (EJ)	●	○	●	●	●	●	Yes
Operation	Mid-City W/Fairfax & Hancock (non -EJ)	●	○	○	○	●	○	Yes
Wilshire/Fairfax Station								
Construction	Miracle Mile (EJ)	●	○	●	●	●	●	Yes
Operation	Mid-City W/Fairfax & Carthay (non-EJ)	●	○	○	○	○	○	Yes
Wilshire/La Cienega Station								
Construction	Beverly Hills (non-EJ)	●	○	●	●	●	●	No
Operation		●	○	○	○	●	○	No
Wilshire/Rodeo Station								
Construction	Beverly Hills (non-EJ)	●	○	●	●	●	●	No
Operation		●	○	○	○	○	○	No
Century City-Constellation Station								
Construction	Century City (non-EJ)	●	○	●	●	●	●	No
Operation		○	○	○	○	○	○	No
Century City- Santa Monica Station								
Construction	Century City (non-EJ)	●	○	●	●	●	●	No
Operation		○	○	○	○	○	○	No
Westwood/UCLA								
Construction	Westwood (EJ)	●	○	●	●	●	●	Yes
Operation		●	○	○	○	○	○	Yes
Westwood/VA Station								
Construction	VA Hospital Campus (EJ)	●	○	●	●	●	●	Yes
Operation		●	○	○	○	○	○	Yes

● Adverse Impact ○ No Adverse Impact

WESTSIDE SUBWAY EXTENSION PROJECT

6.2.1 Traffic, Circulation, and Parking

6.2.1.1 Construction Impacts Identified in the Final EIS/EIR

Construction traffic effects would be disruptive and adverse from the following changes to the physical environment:

- Increased Truck Volumes
- Reduced access to some commercial driveways
- Lane reductions
- Increased Bus Travel Times from rerouting
- Reduced access for pedestrians and bicyclists
- Off-peak intermittent street closures
- Parking reductions

Section 3.8 of the Final EIS/EIR discusses transportation-related impacts during construction and provides more detail on the mitigation measures listed below. Construction traffic effects would be the most severe at station boxes located within Wilshire Boulevard right of way, where temporary lane closures and detours would occur for a period of four to six months while the decking is installed and removed. While construction traffic effects would be temporary, the adverse effects would be substantial in these areas.

6.2.1.1.1 Construction Traffic, Circulation, and Parking Impacts to Specific Environmental Justice Communities

Table 6-2 shows the specific locations of traffic and parking impacts to EJ communities during construction. Truck traffic volume will increase during construction of the LPA along anticipated haul routes. The truck volumes will range from approximately 25 daily trips for the emergency exit shaft at the Westwood/VA Hospital Station and the Wilshire/Crenshaw construction staging area to between 100 and 140 trips for the TBM launch activity at the Westwood/VA Hospital Station. Increased truck traffic volume could cause visual, noise and vibration impacts along haul routes. As described in Table 6-2, the haul routes generally are along major arterial and most of the land uses along the haul routes are commercial, but there are two EJ communities (Wilshire Park/Koreatown and Westwood) where haul routes would travel on minor arterials for limited stretches. However, neither haul route would travel through a residential community. Metro will implement the following mitigation measure to reduce the impact of haul truck traffic on surrounding communities:

- TCON-2—Designated Haul Routes

Table 6-2. Detailed Construction Traffic and Parking Effects to EJ Communities

Station or Staging Area/ Community Affected (EJ/non EJ)	Haul Trucks per day and Major Land Uses/Locations Affected*	Traffic Control Zones/Temporary Street Closures	Traffic Reductions- Lanes Maintained	Location of Parking Reductions	Potential Reduced Access to Adjacent Uses	Bus Routes Affected	Areas of Reduced Pedestrian and Bicycle Circulation
Wilshire/Western Staging Area							
Wilshire Center/ Koreatown (EJ)	25-50 trips Commercial, MF Residential/ Manhattan and St. Andrews between Wilshire and 6 th Street between Western and St. Andrews, 6 th Street and Western (all in EJ area)	Wilshire between Vermont and Crenshaw, Western between Beverly and Pico	Wilshire 2 EB, 2 WB lanes	Wilshire	Multi-Family residences, church, parking garage on Manhattan and MF residences on Wilshire	18, 20, 66, 207, 209, 710, 720, 757, FT481, DASH Wilshire Center, DASH Hollywood	WB on Wilshire, NB on Manhattan
Wilshire/Crenshaw Staging Area							
Wilshire Park (EJ)	25-60 trips Commercial/ Wilshire and Western (all in EJ area)	Wilshire (Windsor-Western), Crenshaw (Wilshire-8 th)	Wilshire 2 EB, 2 WB lanes	--	Offices near Wilshire/ Crenshaw, Single and Multi-Family residences on Crenshaw and Lorraine	R7, 20, 210, 710,	EB on Wilshire, SB Crenshaw, NB on Lorraine
Wilshire/La Brea Station							
Wilshire Park (EJ)	40-120 trips Commercial/ La Brea (EJ)	Wilshire (La Brea-Rossmore)	Wilshire 2 EB, 2 WB lanes	Wilshire and La Brea	Office, Commercial on Wilshire	20, 212, 312, 720, DASH Fairfax	SB on La Brea
Miracle Mile (EJ)	40-120 trips Commercial/ La Brea (EJ)	Wilshire (La Brea-Fairfax), La Brea (Wilshire-Olympic)	Wilshire 2 EB, 2 WB lanes	Wilshire, La Brea, Detroit	Post Office and Multi-Family Residences on Detroit, Commercial on Wilshire and La Brea	20, 212, 312, 720, DAHS Fairfax	EB on Wilshire, SB on La Brea, NB on Detroit
Mid-City West/Fairfax (non-EJ)	40-120 trips Commercial/ La Brea (EJ) south of Wilshire)	Wilshire (La Brea-Fairfax), La Brea (Wilshire-Beverly)	Wilshire 2 EB, 2 WB lanes	Wilshire, La Brea, Detroit	Multi-Family Residences on Detroit, Commercial on La Brea, Office, Commercial on Wilshire	20, 212, 312, 720, DAHS Fairfax	NB on Detroit, SB on La Brea, WB on Wilshire
Hancock Park (non-EJ)	40-120 trips Commercial/ La Brea (EJ) south	Wilshire (La Brea-Rossmore), La Brea	Wilshire 2 EB, 2 WB	Wilshire	Office, Commercial on Wilshire	20, 212, 312, 720, DAHS Fairfax	WB on Wilshire

WESTSIDE SUBWAY EXTENSION PROJECT

Station or Staging Area/Community Affected (EJ/non EJ)	Haul Trucks per day and Major Land Uses/Locations Affected*	Traffic Control Zones/Temporary Street Closures	Traffic Reductions-Lanes Maintained	Location of Parking Reductions	Potential Reduced Access to Adjacent Uses	Bus Routes Affected	Areas of Reduced Pedestrian and Bicycle Circulation
	of Wilshire)	(Wilshire-Beverly)	lanes				
Wilshire/Fairfax Station							
Miracle Mile (EJ)	40-80 trips Commercial/Wilshire (Straddles EJ and non-EJ) and La Brea (EJ)	Wilshire (Fairfax-La Brea), Fairfax (Wilshire-Olympic)	Wilshire 2 EB, 2 WB lanes	Wilshire, Orange Grove, Ogden	Museums on Wilshire, Office, Commercial	20, 217, 720, 780, DASH Fairfax	EB on Wilshire, NB on Orange Grove, SB on Ogden
Mid-City West/Fairfax (non-EJ)	40-80 trips Commercial/Wilshire(Straddles EJ and non-EJ), La Brea (EJ), and La Cienega (non-EJ)	Wilshire (Highland-La Cienega), Fairfax (Wilshire-Beverly)	Wilshire 2 EB, 2 WB lanes	Fairfax, Wilshire	Commercial and Museum on Wilshire, Multi-Family Residences on Fairfax	20, 217, 720, 780, DASH Fairfax	SB on Fairfax, WB on Wilshire
Carthay (non-EJ)	40-80 trips Commercial/Wilshire (Straddles EJ and non-EJ), La Brea (EJ), and La Cienega (non-EJ)	Wilshire (Fairfax-La Cienega), Fairfax (Wilshire-Pico)	Wilshire 2 EB, 2 WB lanes	Wilshire	Office and Commercial on Wilshire	20, 217, 720, 780, DASH Fairfax	EB on Wilshire
Wilshire/La Cienega Station							
Beverly Hills (non-EJ)	40-80 trips Commercial/Wilshire(non-EJ west of Fairfax, straddles EJ and non-EJ east of Fairfax), La Cienega (non-EJ), Robertson, (non-EJ) 3 rd (non-EJ), La Brea (EJ)	Wilshire (La Cienega-Beverly), La Cienega (Whitmore-3rd)	Wilshire 2 EB, 2 WB lanes	Wilshire, La Cienega, Gale	Office, Theater, and Auto Dealership on Wilshire, Multi-Family Residences on Gale, Restaurant on La Brea	20, 105, 705, 720	SB on Gale, WB and EB on Wilshire, NB on La Brea
Wilshire/Rodeo Station							
Beverly Hills (non-EJ)	40-100 trips Commercial/Santa Monica and Robertson (all in non-EJ area)	Wilshire (La Cienega-Century Park East), Beverly (Sunset-Whitworth), Rodeo (Sunset-Wilshire), Canon (Sunset-Whitworth)	Wilshire 2 EB, 2 WB lanes	Reeves, Canon, Wilshire	Retail, Office and Restaurant on Wilshire, Restaurant on Canon, Park on Reeves	14, 20, 720	SB on Reeves, WB and EB on Wilshire, and NB on Canon
Century City Station							
Century City	80-130 trips	Santa Monica (Century	Santa	Santa Monica,	Commercial, Hotel,	4, 28, 704, 728,	WB and EB on

WESTSIDE SUBWAY EXTENSION PROJECT

Station or Staging Area/Community Affected (EJ/non EJ)	Haul Trucks per day and Major Land Uses/Locations Affected*	Traffic Control Zones/Temporary Street Closures	Traffic Reductions-Lanes Maintained	Location of Parking Reductions	Potential Reduced Access to Adjacent Uses	Bus Routes Affected	Areas of Reduced Pedestrian and Bicycle Circulation
(non-EJ)	Commercial/Santa Monica, Constellation, Avenue of the Stars and Century Park East (all in non-EJ area)	Park East-Century Park West), Constellation (Century Park East-Century Park West), Century Park East and Century Park West (Santa Monica-Pico), Avenue of the Stars (Santa Monica-Pico)	Monica 3 EB, 3 WB lanes, Constellation 2 EB, 2 WB lanes	Constellation, Century Park East, Avenue of the Stars	Office,	BB5	Santa Monica and Constellation, NB on Avenue of the Stars, NB on Century Park East
Westwood/UCLA Station							
Westwood (EJ)	40-100 trips Commercial, Institutional/ Linbrook, Wilshire, Kinross, Gayley, and Westwood (all in EJ area)	Wilshire (I-405-Beverly Glen), Veteran (Santa Monica-Sunset), Gayley (Le Conte-Wilshire), Midvale (Rochester-Wilshire)	Wilshire 3 EB, 3 WB lanes	Lot 36	Office, Institutional	20, 223, 431, 534, 573, 720, 761, BB1, BB2, BB3, BB8, BB12, CC6, AV786, UCLA Express	WB on Wilshire, NB on Veteran, SB on Gale and Westwood
Westwood/VA Station							
VA Hospital Campus (EJ)	40-140 trips Commercial, Open Space/Wilshire, Barrington, and Sepulveda (all in EJ area)	I-405 southbound ramps from Wilshire to I-405	Wilshire 4 - EB, 4 WB lanes	North side of Wilshire Boulevard	Open Space, Hospital facilities	720, 20, BB2, BB3, BB4	EB on Wilshire, NB and SB on Bonsall

* Includes truck trips from cut and cover station box construction, TBM tunneling activities, and other station related construction.

In addition to haul truck traffic, other adverse traffic effects associated with LPA construction include reduced roadway traffic lanes and temporary street closures which could result in major traffic disruptions and bottlenecks. Additionally, commercial driveways maybe subject to reduced access around construction sites. Emergency vehicle access (e.g. police, fire and rescue, and ambulance) in and around construction work sites may be affected by lane closures and/or temporary street closures. These adverse effects would occur to the six EJ and five non-EJ communities within the station areas described above. Metro will implement the following mitigation measures to reduce the impacts of street closures during construction:

- TCON-1—Traffic Control Plans
- TCON-3—Emergency Vehicle Access
- TCON-4—Transportation Management Plan
- TCON-5—Coordination with Planned Roadway

Bus service will be impacted by temporary street closures and will require the temporary rerouting of bus lines and bus stop locations. This will result in additional transit travel time for bus riders. Metro will implement the following mitigation measures to reduce the impacts to public transit during construction:

- TCON-6—Temporary Bus Stops and Route Diversions

During construction, existing on-street parking and loading zones will be temporarily removed where traffic lanes are closed or eliminated temporarily. In addition a number of off-street parking spaces will be removed during construction of the Wilshire/La Cienega, Wilshire/Rodeo, Century City Santa Monica option, Westwood/UCLA, and Westwood/VA Hospital Stations. Of these five stations, two are located in EJ communities (Westwood/UCLA and Westwood/VA Hospital). Metro will implement the following mitigation measures to reduce the parking impacts during construction:

- TCON-7—Parking Management
- TCON-8—Parking Monitoring and Community Outreach
- TCON-9—Construction Worker Parking

6.2.1.1.2 Construction Traffic, Circulation, and Parking Impacts Remaining After Mitigation

Mitigation measures would apply uniformly to EJ and non-EJ communities. With implementation of mitigation measures, construction-related adverse effects on transportation and parking in the Study Area will be reduced for adjacent commercial areas and residential neighborhoods. However, at major intersections traffic-related impacts such as split phases of signals and loss of turn lanes will remain adverse effects. These adverse effects would be substantial at the Wilshire/La Brea, Wilshire/Fairfax, Wilshire/La Cienega, Wilshire/Rodeo, Century City (both options), and the on-street Westwood/UCLA Stations due to the four to six months of lane closures and detours that would be required to install piles and decking in the street. These substantial adverse construction traffic effects would affect three EJ communities (Wilshire Park, Miracle Mile, and Westwood) and five non-EJ communities (Hancock Park, Mid-City West/Fairfax, Carthay, Beverly Hills, and Century

City). The off-street Westwood/UCLA Station would not result in substantial construction traffic effects to the Westwood community.

Although the construction impacts identified on traffic circulation, parking, and transit will be temporary, impacts and/or residual impacts will remain adverse during construction. There are no additional feasible mitigation measures which would reduce the effects on the EJ communities.

6.2.1.2 Operational Traffic, Circulation, and Parking Impacts Identified in the Final EIS/EIR

Sections 3.5 and 3.6 of the Final EIS/EIR discuss impacts to traffic and circulation and parking during operation of the LPA. The LPA will have a beneficial effect on the regional transportation network by reducing VMT, VHT, and peak-hour trips in comparison to both future year and existing conditions. The Century City Constellation Station option will result in a greater reduction of VMT, VHT and peak period trips than the Century City Santa Monica Station. For example, there will be approximately 581,000 less regional VMTs in 2035 under the LPA (Century City Constellation) as compared to the No Build Alternative. See Table 3-9, Performance Measures for Existing Conditions and Alternatives in the Final EIS/EIR. However, if the LPA is constructed under the Phased Construction Scenario, benefits will be delayed. Since Phase 1 will terminate at the Wilshire/La Cienega Station and Phase 2 will terminate at the Century City Station, reductions to VMT, VHT, and peak hour trips will be less than the reductions resulting from the full LPA to Westwood/VA Hospital.

The LPA will result in improved level-of-service at several Study Area intersections. In the future (year 2035), the LPA is expected to improve level-of-service at 12 locations in the AM peak hour and at 8 locations in the PM peak hour. Under existing with LPA conditions, the LPA is expected to improve level-of-service at 9 locations in the AM peak hour and 13 locations in the PM peak hour. See Table 3-11, Number of Locations with Intersection Level-of-Service Improvement-with LPA of the Final EIS/EIR. However, if the LPA is constructed under the Phased Construction Scenario, benefits will be delayed. Phase 1 will result in improved level-of-service at 6 locations in the AM peak hour and at 6 locations in the PM peak hour compared to future No Build Alternative conditions. Phase 2 will result in improved level-of-service at 10 locations in the AM peak hour and at 7 locations in the PM peak hour compared to future No Build Alternative conditions.

In general, the intersection level-of-service results indicate that the LPA will not impact any analyzed Study Area intersections compared to existing as well as future No Build Alternative conditions. The exception is the Bank of America entrance at the Wilshire/Rodeo Station (Phase 2), which will result in an adverse and unavoidable traffic impact at the intersection of Wilshire Boulevard and Beverly Drive under future conditions (for more information refer to the *Westside Subway Extension Wilshire/Rodeo Station Bank of America Portal Traffic Impact Analysis Report*). This is the only adverse traffic impact under the LPA and cannot be mitigated. However, this is not the recommended location for the Wilshire/Rodeo entrance, and there will be no traffic impact resulting from the Wilshire/Rodeo entrance at either the Ace Gallery or Union Bank.

The LPA will be constructed below grade and will not result in permanent parking loss at most stations. However, the following station locations will result in long-term impacts to parking:

- **Wilshire/Rodeo (Phase 2)**—Loss of off-street parking associated with the entrance options at the Bank of America and Union Bank Buildings. In addition, the entrance option at the Bank of America Building would result in the removal of three metered on-street parking spaces and one

on-street loading space from the west side of Beverly Drive and up to 13 on-street spaces from the east side of Beverly Drive.

- **Century City Santa Monica Station (Phase 2)**—Some displaced parking in the nearby underground garage at the southwest corner of Santa Monica Boulevard and Century Park East.
- **Westwood/UCLA (On-Street or Off-Street) Station (Phase 3)**—Loss of existing off-street parking at UCLA Lot 36.

In addition, the LPA will result in neighborhood spillover parking impacts at the Wilshire/La Brea (Phase 1), Wilshire/Fairfax (Phase 1), Wilshire/La Cienega (Phase 1), Westwood/UCLA (On-Street or Off-Street) (Phase 3), and Westwood/VA Hospital (South or North) (Phase 3) Stations.

6.2.1.2.1 Operational Traffic, Circulation, and Parking Impacts to Specific Environmental Justice Communities

The one operational traffic impact at the Wilshire/Rodeo Station with the Bank of America entrance would occur in Beverly Hills, which is a non-EJ community. No operational traffic impacts are anticipated for EJ communities under the LPA, including all station, alignment, and station entrance options under consideration.

As seen in Table 6-3, parking spillover impacts would occur throughout the project corridor and would not be limited to EJ communities.

Table 6-3: Parking Spillover Impact Summary for the LPA

Station	Communities Impacted	EJ/non-EJ	Parking Effect
Wilshire/La Brea Station	Miracle Mile	EJ	Impacted
	Wilshire Park	EJ	
	Mid-City West/Fairfax	Non-EJ	
	Hancock Park	Non-EJ	
Wilshire/Fairfax Station	Miracle Mile	EJ	Impacted
	Mid-City West/Fairfax	Non-EJ	
	Carthay	Non-EJ	
Wilshire/La Cienega Station	Beverly Hills	Non-EJ	Impacted
Wilshire/Rodeo Station	Beverly Hills	Non-EJ	None
Century City Santa Monica Blvd Station	Century City	Non-EJ	None
Century City Constellation Blvd Station	Century City	Non-EJ	None
Westwood/UCLA Off-Street Station	Westwood	EJ	Impacted
Westwood/UCLA On-Street	Westwood	EJ	Impacted
Westwood/VA Hospital South	VA Hospital Campus	EJ	Impacted
Westwood/VA Hospital North	VA Hospital Campus	EJ	Impacted
Total Impacted Station Areas			5
Total Impacted EJ Communities			4
Total Impacted non-EJ communities			4

Source: Fehr & Peers, 2010, TAHA, 2012

The LPA will result in neighborhood spillover parking impacts at the Wilshire/La Brea (Phase 1), Wilshire/Fairfax (Phase 1), Wilshire/La Cienega (Phase 1), Westwood/UCLA (On-Street and Off-Street) (Phase 3), and Westwood/VA Hospital (South and North) (Phase 3) Stations. Of these stations, four are located in EJ communities (Wilshire/La Brea, Wilshire/Fairfax, Westwood/UCLA, and Westwood/VA Hospital).

The LPA would result in a permanent parking loss the Wilshire/Rodeo (Phase 2), Century City Santa Monica (Phase 2), and the Westwood/UCLA (On-Street and Off-Street) (Phase 3) Stations. The parking impacts at the Wilshire/Rodeo Station are located in Beverly Hills, which is a non-EJ community. The parking impacts at the Century City Santa Monica Station are located in Century City, which is a non-EJ community. The parking impacts at the Westwood/UCLA Station are located in Westwood, which is an EJ community.

The following mitigation measures will be implemented to minimize parking impacts due to either permanent parking loss or neighborhood spillover parking:

- T-1—Coordination with Property Owners. Metro will coordinate with the appropriate property owners and other relevant parties regarding permanent parking losses.
- T-2—Parking Monitoring and Community Outreach
- T-3—Residential Permit Parking Districts
- T-4—Consideration of Shared Parking Program

6.2.1.2.2 Operational Traffic, Circulation, and Parking Impacts Remaining After Mitigation

Mitigation measures would apply uniformly to EJ and non-EJ communities. With implementation of mitigation, no adverse operational parking impacts would remain in EJ or non-EJ communities. One adverse operational traffic impact would remain in a non-EJ community (Beverly Hills) at the Wilshire/Rodeo Station if the entrance is located at the Bank of America site. Following the mitigation, no adverse operational traffic or parking impacts would remain in EJ communities.

6.2.2 Displacement and Relocation

6.2.2.1 Construction Displacement and Relocation Impacts Identified in the Final EIS/EIR

Acquisitions and permanent and construction easements would occur at each station area and are discussed in the *Westside Subway Extension Project Acquisitions and Displacement Supplemental Report*. No adverse impacts were found to occur.

6.2.2.1.1 Construction Displacement and Relocation Impacts to Specific Environmental Justice Communities

The LPA would result in the full permanent acquisition of up to 57 parcels. Of these acquisitions, at most sixteen would be located in EJ communities. Between one and three would be located in Wilshire Center/Koreatown (at Wilshire/Western construction staging site), twelve would be located in Miracle Mile (six at Wilshire/La Brea and six at Wilshire/Fairfax), and one would be located in Wilshire Park (at Wilshire/Crenshaw construction staging site). Given the size of the project, the acquisition of sixteen of over 100,000 parcels in the study area during construction in EJ communities would not be adverse. There would be up to 41 full parcel acquisitions in non-EJ

communities. Similarly, these effects would not be adverse during construction in non-EJ communities.

If the LPA is constructed under the Phased Construction Scenario, the acquisitions would occur during the phases as described below. The same mitigation measures will be implemented whether the LPA is constructed under the Phased Construction Scenario or the Concurrent Construction Scenario.

Phase 1 to Wilshire/La Cienega

Property acquisitions and construction easements are located around the station locations and construction staging sites for Phase 1. There will be property acquisition related to construction staging in two EJ communities: at the existing Wilshire/Western Station in Phase 1, which is located in Wilshire Center/Koreatown, and at Wilshire/Crenshaw, which is located in Wilshire Park.

Twelve residential units will be displaced in two EJ communities: at the Wilshire/Crenshaw construction staging area (Wilshire Park), the Wilshire/La Brea Station (Miracle Mile), and the Wilshire/Fairfax Station (also Miracle Mile). Although 12 residential units would be displaced in EJ communities, given the total of over 600,000 units in EJ communities, the impact during construction would not be adverse.

There would be six residential units displaced in non-EJ communities- all six at the Wilshire/La Cienega Station. Similarly, the effects during construction would not be adverse to non-EJ communities.

The following mitigation measures will be implemented to reduce the impacts associated with displacement and relocations:

- CN-1—Relocation Assistance and Compensation
- CN-2—Propose Joint-use agreements
- CN-3—Compensation for Easements

The residents in both EJ and non-EJ communities will be compensated under the Uniform Relocation Assistance and Real Property Acquisition Act as further described in CN-1. Where businesses are displaced, it is anticipated that the vast majority will be relocated to nearby areas and no adverse effects would occur during construction to EJ or non-EJ communities.

Phase 2 to Century City

None of the stations in Phase 2 are located in EJ communities or communities of concern. Therefore, of the 5 to 25 full acquisitions that would occur as part of Phase 2, none will be located in an EJ community or community of concern.

Property acquisition as part of Phase 2 will not result in adverse effects.

Phase 3 to Westwood/VA Hospital

Both station locations in Phase 3 (both station options for Westwood/UCLA (Off-Street and On-Street); and both station options for Westwood/VA Hospital (South and North) are located in EJ

population areas. No full acquisitions will occur as part of Phase 3 and therefore property acquisition as part of Phase 3 will not result in adverse effects to an EJ community.

6.2.2.1.2 Construction Displacement and Relocation Impacts Remaining After Mitigation

Mitigation measures would apply uniformly to EJ and non-EJ communities. With implementation of mitigation, no adverse displacement or relocation impacts would occur during construction or operation in EJ or non-EJ communities.

6.2.2.2 Operational Displacement and Relocation Impacts Identified in the Final EIS/EIR

All acquisitions would occur during the construction and, therefore, all displacement and relocation impacts are discussed above.

6.2.3 Visual Resources and Aesthetics

6.2.3.1 Construction Visual Resources and Aesthetics Impacts Identified in the FEIS/FEIR

The introduction of heavy construction equipment, stockpiled construction-related materials, erosion devices, excavated materials, and the removal of trees in these primarily commercial and residential areas will conflict with existing visual character and will change visual quality. This will result in adverse visual effects during construction.

6.2.3.1.1 Construction Visual Resources and Aesthetics Impacts to Specific Environmental Justice Communities

The visual effects described above would occur at all seven of proposed station locations and two staging areas. This would adversely affect the six EJ communities during construction (Wilshire Center/Koreatown (Phase 1), Wilshire Park (Phase 1), Miracle Mile (Phase 1), Windsor Square (Phase 1), Westwood (Phase 3), and VA Hospital Campus (Phase 3)). The visual effects would adversely affect five non-EJ communities during construction. Additionally, the raised decking at the Wilshire/Fairfax and Wilshire/La Brea Stations (Phase 1) (approximately 2 feet above grade) will temporarily increase the visual impacts to adjacent properties at these stations. Both of these stations would adversely affect two EJ communities (Wilshire Park and Miracle Mile) and three non-EJ communities (Hancock Park, Mid-City West/Fairfax, and Carthay) during construction. These effects would occur during construction as part of Phase 1. The lighting of the construction staging areas at night will result in the creation of a new light source in the same six EJ and five non-EJ communities listed above. If not mitigated, this would be an adverse effect during construction to EJ and non-EJ communities. The following mitigation measures will be implemented during construction of the LPA to reduce visual effects:

- CON-2—Timely Removal of Erosion-Control Devices
- CON-3—Location of Construction Materials
- CON-4—Construction Lighting
- CON-5—Screening of Construction Staging Areas

6.2.3.1.2 Construction Visual Resources and Aesthetics Impacts Remaining After Mitigation

Mitigation measures would apply uniformly to EJ and non-EJ communities. With implementation of these mitigation measures, no adverse effects to visual resources will remain during construction to EJ or non-EJ communities.

6.2.3.2 Operational Visual Resources and Aesthetics Impacts Identified in the FEIS/FEIR

As discussed in Section 4.3, Visual Quality, based on the urban design analysis conducted for the LPA, station portal designs and ancillary facilities may contribute to enhancement of the visual quality of the neighborhoods where they will be located. Effects are related to the visibility of station components and tunnel ventilation structures. Combining landscaping and design elements in the LPA and the mitigation measures will ensure that there are no adverse impacts to EJ and non-EJ communities. While there are no adverse effects, the mitigation measures, as listed below, are incorporated into the LPA and will ensure that impacts related to conflicts between scale and visual character, building removal and right-of-way acquisition, removal of mature vegetation, location of ancillary facilities, and introduction of new sources of light and glare are avoided or minimized:

- VIS-1—Minimize Visual Clutter
- VIS-2—Replacement for Tree Removal
- VIS-3—Source Shielding in Exterior Lighting
- VIS-4—Integrate Station Designs with Area Redevelopment Plans

6.2.3.2.1 Operational Visual Resources and Aesthetics Impacts to Specific Environmental Justice Communities

No adverse effects to visual resources would occur to EJ or non-EJ communities during operation.

6.2.3.2.2 Operational Visual Resources and Aesthetics Impacts Remaining After Mitigation

Mitigation measures would apply uniformly to EJ and non-EJ communities. With implementation of these mitigation measures, no adverse effects to visual resources will remain during operation to EJ or non-EJ communities.

6.2.4 Air Quality and Climate Change

6.2.4.1 Construction Air Quality and Climate Change Impacts Identified in the FEIS/FEIR

Air quality effects are discussed in Section 4.15 of the Final EIS/EIR. SCAQMD thresholds will be exceeded for all pollutants when the total project emissions over the duration of the construction period are accounted for and would result in adverse effects. This is due to the accelerated schedule that has been developed to minimize the disturbances that construction can bring to the residents and businesses within the Study Area. In addition, nitrous oxides (NO_x) thresholds will be exceeded for all construction elements. NO_x levels will be elevated due partially to the proposed use of diesel locomotives to extract soil during the tunnel boring process.

6.2.4.1.1 Construction Air Quality and Climate Change Impacts to Specific Environmental Justice Communities

The adverse air quality impacts during construction described above would occur near stations and staging areas throughout the corridor, and would be expected to occur in six EJ communities (Wilshire Center/Koreatown (Phase 1), Wilshire Park (Phase 1), Miracle Mile (Phase 1), Windsor Square (Phase 1), Westwood (Phase 3), and VA Hospital Campus (Phase 3) and five non-EJ communities (Hancock Park (Phase 1), Mid-City West/Fairfax (Phase 1), Carthay (Phase 1), Beverly Hills (Phase 2), and Century City (Phase 2)).

Table 6-4 identifies the sensitive receptors located in EJ and non-EJ communities within 500 feet that would most likely be affected by construction activity. Adverse air quality impacts during construction would be substantial at three station locations (Wilshire/La Brea (Phase 1), Century City (Phase 2), and Westwood/VA Hospital (Phase 3)) where mined dirt from the TBM is exported for a period of four to six years. The export of soil would result in an increase in NO_x emissions that would substantially exceed the SCAQMD thresholds. These substantial adverse effects would occur to three EJ communities (Wilshire Park, Miracle Mile, and VA Hospital Campus) and three non-EJ communities (Hancock Park, Mid-City West/Fairfax, and Century City).

Table 6-4. Sensitive Uses within EJ Communities within 500 feet of Station and Construction Staging Areas

Station or Staging Area/ EJ Community Affected	Name of Sensitive Receptor Affected by Construction *	Category
Wilshire/Western Staging Area		
Wilshire Center/ Koreatown (EJ)	Evergreen Child Care Wilshire Adult Day Health Care Residences on Wilshire and Ingram	Daycare Adult Health Care Residential
Wilshire/Crenshaw Staging Area		
Wilshire Park (EJ)	Family Home Health Care Wilshire United Methodist Church Residences along Loraine, Crenshaw, and Bronson	Adult Health Care Church Residential
Wilshire/La Brea Station		
Wilshire Park (EJ)	Memorial Branch Library	Library
Miracle Mile (EJ)	German Cultural Center Comfort Keepers Residences north of 8 th , along Cloverdale, Detroit, and Sycamore	Cultural Adult Health Care Residential
Hancock Park (non EJ)	Residences along Sycamore, Orange, and Mansfield	Residential
Mid-City West/Fairfax (non EJ)	Residences along Detroit and Cloverdale	Residential
Wilshire/Fairfax Station		
Miracle Mile (EJ)	Petersen Automotive Museum Residences along Ogden, Orange Grove and Genesee	Museum Residential
Mid-City West/Fairfax (non EJ)	LACMA Residences along Orange	Museum Residential
Carthay (non EJ)	Residences along Wilshire and Warner	Residential
Wilshire/La Cienega Station		

Station or Staging Area/ EJ Community Affected	Name of Sensitive Receptor Affected by Construction *	Category
Beverly Hills (non EJ)	Residences along Gale, Hamilton, and Le Doux Carmelite Elder Care Management Martyrs Memorial and Museum of the Holocaust Kahn Memorial Library Montessori Children's World	Residential Adult Health Care Museum Library Daycare
Wilshire/Rodeo Station		
Beverly Hills (non EJ)	Park on Reeves Residences along Wilshire, Crescent, Canon, Reeves, Beverly, and El Camino Hebrew Academy Nessah	Open Space Residential Daycare
Century City Station		
Century City (non EJ)	Golf Course Residences along Carmelita, Walden, Durant School along Heath Residences along Avenue of the Stars and Century Park East Elder Friends	Open Space Residential Institutional Residential Adult Day Care
Westwood/UCLA Station		
Westwood (EJ)	Gayley Center Armand Hammer Museum Westwood Center Westwood Presbyterian School	Cultural Museum Business Center Daycare
Westwood/VA Hospital Station		
VA Hospital Campus (EJ)	West Los Angeles Medical Center	Adult Health Care

*Affected Sensitive Receptors are identified as those-sensitive uses within 500 feet of station and construction staging areas.

The following mitigation measures will be implemented to minimize air quality emission impacts during construction:

- CON-6—Meet Mine Safety (MSHA) Standards
- CON-7—Meet SCAQMD Standards
- CON-8—Monitoring and Recording of Air Quality at Worksites
- CON-9—No Idling of Heavy Equipment
- CON-10—Maintenance of Construction Equipment
- CON-11—Prohibit Tampering of Equipment
- CON-12—Use of Best Available Emissions Control Technologies
- CON-13—Placement of Construction Equipment

The SCAQMD thresholds for PM₁₀ for the LPA will be exceeded if not mitigated at locations with TBM entry and exit sites due to dirt handling. Demolition, grading, stockpiling, and hauling soil will contribute to particulate matter emissions. These impacts would be concentrated at stations and staging areas throughout the corridor. The following mitigation measures will be implemented to reduce air quality particulate matter impacts during construction:

- CON-14—Measures to Reduce the Predicted PM₁₀ Levels

- CON-15—Reduce Street Debris
- CON-16—Dust Control During Transport
- CON-17—Fugitive Dust Control
- CON-18—Street Watering
- CON-19—Spillage Prevention for Non-Earthmoving Equipment
- CON-20—Spillage Prevention for Earthmoving Equipment
- CON-21—Additional Controls to Reduce Emissions

6.2.4.1.2 Construction Air Quality and Climate Change Impacts Remaining After Mitigation

Mitigation measures would apply uniformly to EJ and non-EJ communities. With implementation of the above mitigation measures, emissions will remain adverse during construction for six EJ and five non-EJ communities. Adverse NO_x air quality impacts during construction would be substantial in three EJ and three non-EJ communities (described above). There are no additional feasible mitigation measures to reduce the air quality impacts to EJ communities during construction.

6.2.4.2 Operational Air Quality and Climate Change Impacts Identified in the FEIS/FEIR

The LPA would result in reductions in VMT with corresponding reductions in exhaust emissions. A beneficial effect with respect to reducing regional criteria pollutant emissions is anticipated. The LPA will decrease greenhouse gas emissions in comparison with the No Build Alternative. A beneficial effect with respect to reducing regional criteria pollutant emissions and greenhouse gas emissions is anticipated. However, if the LPA is constructed under the Phased Construction Scenario, the air quality and climate change benefits of the full LPA to Westwood/VA Hospital will occur later than under the Concurrent Construction Scenario.

6.2.4.2.1 Operational Air Quality and Climate Change Impacts to Specific Environmental Justice Communities

No adverse air quality effects would occur to EJ or non-EJ communities during operation.

6.2.4.2.2 Operational Air Quality and Climate Change Impacts Remaining After Mitigation

The project would result in beneficial operational air quality effects to EJ and non-EJ communities without the implementation of mitigation measures.

6.2.5 Noise and Vibration

6.2.5.1 Construction Noise and Vibration Impacts Identified in the FEIS/FEIR

As described in Section 4.15 of the Final EIS/EIR, the greatest noise impacts will occur near stations, tunnel access portals, and construction laydown areas where construction activities at the surface are concentrated. With the exception of these areas, all other construction will occur completely below-grade. The LPA would result in adverse noise effects during construction.

During construction of the LPA, impact pile driving at the station boxes will result in adverse vibration impacts. Perceptible vibration levels could be experienced within 200 feet of pile driving operations. Additionally, equipment used for underground construction, such as the TBM and mine trains, could generate vibration levels that could result in audible groundborne noise levels in buildings at the surface, depending on the depth of the tunnel and soil conditions. The operation of the mine trains could contribute to underground construction vibration since they will operate continuously during the excavation, mining, and finishing of the tunnel.

6.2.5.1.1 Construction Noise and Vibration Impacts to Specific Environmental Justice Communities

Adverse construction noise effects would occur to sensitive uses within 500 feet of EJ communities near the Wilshire/Western and Wilshire/Crenshaw staging areas, and the Wilshire/La Brea, Wilshire/Fairfax, Westwood/UCLA, and Westwood/VA Hospital station areas. Adverse construction noise effects would occur to sensitive uses within 500 feet of non-EJ communities near the Wilshire/La Brea, Wilshire/Fairfax, Wilshire/La Cienega, Wilshire/Rodeo, and Century City station areas. These sensitive uses are identified in Table 6-4.

Tunneling plants and materials, including a slurry separation system, if used, will be located at these tunnel access shaft sites. The slurry plant, if used, will be located at the Wilshire/La Brea, Century City, and Westwood/VA Hospital Stations. With the exception of the station and construction staging areas, all other construction will occur completely below-grade.

To minimize noise impacts, the following mitigation measures will be implemented:

- CON-22—Hire or Retain the Services of an Acoustical Engineer
- CON-23—Prepare a Noise Control Plan
- CON-24—Comply with the Provisions of the Nighttime Noise Variance
- CON-25—Noise Monitoring
- CON-26—Use of Specific Construction Equipment at Night
- CON-27—Noise Barrier Walls for Nighttime Construction
- CON-28—Comply with Local Noise Ordinances
- CON-29—Signage
- CON-30—Use of Noise Control Devices
- CON-31—Use of Fixed Noise-Producing Equipment for Compliance
- CON-32—Use of Mobile or Fixed Noise-Producing Equipment
- CON-33—Use of Electrically Powered Equipment
- CON-34—Use of Temporary Noise Barriers and Sound-Control Curtains
- CON-35—Distance from Noise-Sensitive Receivers
- CON-36—Limited Use of Horns, Whistles, Alarms, and Bells
- CON-37—Requirements on Project Equipment

- CON-38—Limited Audibility of Project Related Public Addresses or Music
- CON-39—Use of Haul Routes with the Least Overall Noise Impact
- CON-40—Designated Parking Areas for Construction-Related Traffic
- CON-41—Enclosures for Fixed Equipment
- TCON-2—Designated Haul Routes

The following mitigation measures will be implemented during construction to minimize vibration impacts:

- CON-42—Phasing of Ground Impacting Operations
- CON-43—Alternatives to Impact Pile Driving
- CON-44—Alternative Demolition Methods
- CON-45— Restriction on Use of Vibratory Rollers and Packers
- CON-46—Metro Ground-Born Noise and Ground-Born Vibration limits

6.2.5.1.2 Construction Noise and Vibration Impacts Remaining After Mitigation

Mitigation measures would apply uniformly to EJ and non-EJ communities. With implementation of mitigation measures, noise will remain an adverse effect for EJ and non-EJ communities during construction, but vibration impacts will be mitigated through measures listed above. Although these residual noise effects would be adverse during construction, they would occur in an urban environment along a high density commercial corridor and would not be substantial. There are no feasible mitigation measures to reduce the noise impacts to EJ and non-EJ communities during construction.

6.2.5.2 Operational Noise and Vibration Impacts Identified in the FEIS/FEIR

Components of the LPA with the potential to generate noise that will be audible at the surface are the station ventilation system fans and the emergency ventilation system fans, which are subject to periodic testing, which will adhere to the MTA design levels and not exceed FTA Noise Impact Criteria. Noise from rail operations, including the interaction of wheels on tracks, motive power, signaling and warning systems, and the TPSS, will occur well below ground. No adverse effects would occur from operational noise.

Ground-borne vibration during operations is not predicted to exceed the FTA criteria at any of the vibration-sensitive receivers. There are three locations along the LPA where exceedance of the FTA ground-borne noise criteria will occur during operation and an adverse effect would occur prior to mitigation.

6.2.5.2.1 Operational Noise and Vibration Impacts to Specific Environmental Justice Communities

There are no sensitive receptors located in EJ communities that would experience adverse effects from operational noise. The vibration analyses conducted for the project indicates that no adverse ground-borne vibration impacts would occur. As no noise or ground-borne vibration effects would

occur, no adverse operational noise or ground-borne vibration impacts to EJ or non-EJ communities are anticipated.

The three locations along the LPA where exceedance of the FTA ground-borne noise criteria will occur due to train operations along tangent track or through crossovers, if mitigation measures are not implemented, are the Wilshire Ebell Theatre, apartments on Wilshire Boulevard and South Orange Drive, and the Saban Theatre. All three locations are located along Phase 1 if constructed under the Phased Construction Schedule. The Ebell Theatre and the apartments are both located in Wilshire Park, an EJ community. The Saban Theatre is located in Beverly Hills, which is a non-EJ community. The following mitigation measures will be implemented to mitigate ground-borne noise impacts:

- VIB-1-Use of High Compliance Direct Fixation Resilient Rail Fasteners
- VIB-2-Use of A Low Impact Crossover

6.2.5.2.2 Operational Noise and Vibration Impacts Remaining After Mitigation

Mitigation measures would apply uniformly to EJ and non-EJ communities. With implementation of these mitigation measures, the operation of the LPA will not result in adverse operational noise or vibration impacts to EJ or non-EJ communities.

6.2.6 Economic Vitality and Employment Opportunities

6.2.6.1 Construction Economic Vitality and Employment Opportunities Impacts Identified in the FEIS/FEIR

Construction of the LPA will have temporary impacts on businesses, particularly those near or adjacent to construction sites. Construction impacts will include: traffic disruption; increased noise, vibration and dust; modified vehicular and pedestrian traffic patterns; and utility disruptions. These construction impacts will result in adverse economic impacts to businesses.

6.2.6.1.1 Construction Economic Vitality and Employment Opportunities Impacts to Specific Environmental Justice Communities

Construction effects would be the most severe in two areas. The first area would be at the three station locations (Wilshire/La Brea, Century City, and Westwood/VA Hospital) where mined dirt is exported from the TBM. The export of soil would occur for approximately four to six years at these locations, including the station excavation as well as the tunneling activities. The other area would be at station boxes located within Wilshire Boulevard right of way, where temporary lane closures and detours would occur for a period of four to six months while the decking is installed and removed. This area is located in an industrial area and construction activity would not require significant excavation or traffic closures and lane reductions.

Sidewalks will be temporarily obstructed for station and tunnel construction, thereby reducing business access. However, at least one access point will be maintained at all times. The selection of some station entrances will result in a temporary loss of parking during construction. Business impacts will also include reduced visibility of commercial signs and business locations. These construction impacts will result in adverse economic impacts to businesses.

In general, Wilshire Boulevard is a high-density commercial corridor with a larger number of highway-oriented and regional businesses than local-serving businesses. A survey of local-serving businesses near station areas was conducted and summarized in Table 6-5. The table shows a summary of the station areas, whether they are located in EJ communities or communities of concern and the ratio of local serving businesses that would be affected during construction.

In total, there are approximately 116 local-serving businesses that are within 500 feet of station areas that would be directly affected by construction activity and 496 that are within the station service areas (0.25 miles). Businesses within 0.25 miles could experience minor disruptions in circulation in access but the effects would not be adverse. Of the local-serving businesses within 500 feet, 36 (31 percent) are located in EJ communities. During construction, adverse economic effects would occur to 36 local serving businesses in EJ communities and 80 local serving businesses in non-EJ communities from disruptions in access.

Table 6-5: Distribution of Local Serving Businesses near Station Areas

Station	Distribution of EJ and non-EJ Communities	Local Serving Business Within Station Area Construction Impact Zone (500 feet)		Local Serving Business Within Station Service Areas (0.25 miles)	
		EJ	Non EJ	EJ	Non EJ
Wilshire/La Brea Station	2 EJ (Wilshire Park, Miracle Mile), 2 non-EJ (Hancock Park, Mid-City West/Fairfax)	22	12	42	35
Wilshire/Fairfax Station	1 EJ (Miracle Mile), 2 non-EJ (Mid-City West/Fairfax, Carthay)	2	5	7	19
Wilshire/La Cienega Station	1 non-EJ (Beverly Hills)	0	12	0	49
Wilshire/Rodeo Station	1 non-EJ (Beverly Hills)	0	32	0	190
Century City Santa Monica Station	1 non-EJ (Century City)	0	8	0	29
Century City Constellation Station	1 non-EJ (Century City)	0	11	0	33
Westwood/UCLA	1 EJ (Westwood)	12	0	88	0
Westwood/VA Hospital	1 EJ (VA Hospital Campus)	0	0	4	0
Total	4 EJ Communities/5 non-EJ Communities	36	80	141	355

Source: TAHA, 2011

Local Serving Businesses include grocery stores, restaurants, schools, libraries, post offices, barbershops, bakeries, bookstores, newsstands, florists, dry cleaners, specialty retail and banks

The following mitigation measures, which include measures to maintain access to residences and businesses, will be implemented during the construction of the LPA.

- CON-1—Signage TCON-1—Traffic Control Plans
- TCON-2—Designated Haul Routes
- TCON-3—Emergency Vehicle Access
- TCON-4—Transportation Management Plan

- TCON-7—Parking Management
- TCON-8—Parking Monitoring and Community Outreach
- TCON-10—Pedestrian Routes and Access
- TCON-11—Bicycle Paths and Access

6.2.6.1.2 Construction Economic Vitality and Employment Opportunities Impacts Remaining After Mitigation

Mitigation measures would apply uniformly to EJ and non-EJ communities. With implementation of these mitigation measures, there will be no adverse effect to EJ and non-EJ communities or neighborhoods during construction.

6.2.6.2 Operational Economic Vitality and Employment Opportunities Impacts Identified in the FEIS/FEIR

Most businesses along the proposed alignment would be expected to benefit from operation of the LPA as mobility would be increased throughout the Westside and greater Los Angeles area resulting in an increase in pedestrian activity around the stations, and a beneficial increase in potential customers. Operational effects would be beneficial to EJ and non-EJ communities.

The new stations and increased mobility would result in regional connection to the rest of the transit network and would result in a potential beneficial effect by increasing local access and mobility.

These direct user benefits (primarily travel time savings) filter through to businesses within the corridor, both by improving worker access to jobs within the corridor, and also by improving access to retail, entertainment, restaurant, and other non-work related establishments. As a subset of the improved access to labor markets, there is an equity benefit, as transit dependent persons, who usually have lower incomes and may belong to minority groups, are a surprisingly high percentage of direct beneficiaries. Finally, enhanced real estate values and redevelopment opportunities around stations are likely to accrue within up to 0.25- to 0.50-mile ranges around stations, particularly at those stations with the highest volumes of boardings and alightings.

6.2.6.2.1 Operational Economic Vitality and Employment Opportunities Impacts to Specific Environmental Justice Communities

No adverse effects to economic vitality and employment would occur to EJ or non-EJ communities during operation.

6.2.6.2.2 Operational Economic Vitality and Employment Opportunities Impacts Remaining After Mitigation

The project would result in beneficial operational to economic vitality and employment effects to EJ and non-EJ communities without the implementation of mitigation measures.

7.0 SUMMARY AND PROPORTIONALITY OF IMPACTS AFTER MITIGATION

The intent of the Executive Order 12898 as well as subsequent FTA guidance pertaining to environmental justice is both identify whether EJ communities are affected by a federal action and whether the federal action results in a disproportionate impact to minority or low income communities when compared to other non-minority and non-low communities within the overall project area. The FTA identifies a five step procedure for evaluating disproportionately high and adverse effects, known as the benefits and burdens analysis, which was described in Section 6.0.

7.1 Step One – Identify Adverse Effects to EJ Communities

Section 6.0 addressed step one of the benefits and burdens analysis (*what specific adverse effects are occurring to EJ communities and whether those adverse effects are high and substantial*).

7.1.1 Adverse Effects to EJ Communities

Table 7-1 summarizes the impacts from the Westside Subway Extension Project by station area/staging area after implementation of mitigation. The following environmental topic areas would result in adverse effects to EJ communities:

- Construction traffic and circulation
- Construction related air quality
- Construction related noise and vibration

As shown, in Table 7-1, the following six EJ communities will experience adverse effects after implementation of mitigation:

- Miracle Mile
- Westwood
- Wilshire Center/Koreatown
- Wilshire Park
- Windsor Square
- VA Hospital Campus

Table 7-1: Summary Determination of Adverse Effects to EJ Communities that are Substantial after Mitigation

Station/Staging Area	Communities Present (EJ/non EJ)	Adverse Effects						Substantial Adverse Effects
		Traffic Circulation, Parking	Displacement and Relocation	Visual Resources	Air Quality	Noise and Vibration	Economic and Fiscal	
Wilshire/Western Staging Area								
Construction	Wilshire Center/ Koreatown (EJ)	●	○	○	●	●	○	No
Operation		○	○	○	○	○	○	No
Wilshire/Crenshaw Staging Area								
Construction	Wilshire Park (EJ)	●	○	○	●	●	○	No
Operation	Windsor Square (EJ)	○	○	○	○	○	○	No
Wilshire/La Brea Station								
Construction	Miracle Mile (EJ)	●	○	○	●	●	○	Traffic and Air Quality
Operation	Wilshire Park (EJ) Mid-City West/Fairfax (non EJ)	○	○	○	○	○	○	No
Wilshire/Fairfax Station								
Construction	Miracle Mile (EJ)	●	○	○	●	●	○	Traffic
Operation	Mid-City West/Fairfax (non EJ) Carthay (non EJ)	○	○	○	○	○	○	No
Wilshire/La Cienega Station								
Construction	Beverly Hills (non EJ)	●	○	○	●	●	○	Traffic
Operation		○	○	○	○	○	○	No
Wilshire/Rodeo Station								
Construction	Beverly Hills (non EJ)	●	○	○	●	●	○	Traffic
Operation		●	○	○	○	○	○	No
Century City-Constellation Station								
Construction	Century City (non EJ)	●	○	○	●	●	○	Traffic and Air Quality
Operation		○	○	○	○	○	○	No
Century City- Santa Monica Station								
Construction	Century City (non EJ)	●	○	○	●	●	○	Traffic and Air Quality
Operation		○	○	○	○	○	○	No
Westwood/UCLA Station								
Construction	Westwood (EJ)	●	○	○	●	●	○	Traffic (on-street option)
Operation		○	○	○	○	○	○	No
Westwood/VA Station								
Construction	VA Hospital Campus (EJ)	●	○	○	●	●	○	Air Quality
Operation		○	○	○	○	○	○	No

● Adverse Impact ○ No Adverse Impact

WESTSIDE SUBWAY EXTENSION PROJECT

7.1.2 Adverse Effects that are Substantial to EJ Communities

As described in Section 6.0, the adverse effects would be substantial for construction related traffic and air quality. Although the construction noise effects would be adverse, they would be temporary, occur in an urban environment, and would not be considered substantial. The substantial adverse traffic effects would occur at major intersections from temporary street closures, lane reductions, split phases of signals and loss of turn lanes. Due to the four to six months of lane closures and detours that would be required to install piles and decking in the street, these effects would occur at the Wilshire/La Brea, Wilshire/Fairfax, Wilshire/La Cienega, Wilshire/Rodeo, Century City (both options), and the on-street Westwood/UCLA Stations. The substantial adverse construction air quality effects would occur from NO_x emissions that would exceed the SCAQMD thresholds by a magnitude of ten. These effects would occur at three station locations (Wilshire/La Brea (Phase 1), Century City (Phase 2), and Westwood/VA Hospital (Phase 3)) where mined dirt from the TBM is exported for a period of four to six years.

7.1.3 Communities Affected by Substantial Construction Traffic and Air Quality Adverse Effects

The EJ and non-EJ communities affected by these substantial effects after implementation of mitigation are listed below:

Construction Traffic

EJ Communities

Wilshire Park
Miracle Mile
Westwood (not substantial for off-street)

Non-EJ Communities

Hancock Park
Mid-City West/Fairfax
Carthay
Beverly Hills
Century City

Construction Air Quality

EJ Communities

Wilshire Park
Miracle Mile
VA Hospital Campus

Non-EJ Communities

Hancock Park
Mid-City West/Fairfax
Century City

7.2 Step Two – Assess Whether Effects on EJ Communities Exceed Effects to non-EJ Communities

Step two of the Benefits and Burdens analysis requires an assessment of whether the effects on EJ communities exceed those borne by non-EJ communities.

Based on the geographical distribution of communities near the station areas and the effects to specific EJ communities described in Section 6.0, these substantial adverse construction effects would not be concentrated in any of the above communities. Based on the geographic distribution of EJ and non-EJ communities identified above, the substantial adverse effects during construction related to traffic and air quality would be borne by non-EJ communities.

As described in Section 6.2.5.1, the adverse noise effects that were determined not to be substantial (construction noise) for EJ communities would not exceed the effects borne by non-EJ communities. These impacts would occur within all seven station areas along the project corridor. There were 12 sensitive receptors identified within EJ communities and 19 sensitive receptors identified in non-EJ communities.¹ There is no aspect of the project design or the presumed construction scenarios that suggest that there would be meaningful differences in the intensity and magnitude of these construction noise impacts between station areas. Thus, no disproportionate effects from construction noise are anticipated to EJ communities.

7.3 Step Three – Assess Whether Cumulative or Indirect Effects Adversely Affect an EJ Community

Step three of the Benefits and Burdens analysis requires an assessment of whether cumulative or indirect effects would adversely affect an EJ community.

This section discusses the comparative cumulative and indirect effects to EJ and non-EJ communities affected by the LPA. As discussed above, eleven communities are affected by the LPA. Six of these are EJ communities and five are non-EJ communities. During the construction process, station areas and staging areas where excavation would take place are expected to be the focal point for construction-related proximity impacts such as traffic and parking disruption, visual, air quality and noise/vibration effects. These effects would occur in a combined fashion in each of the seven LPA station areas and two staging areas. The two staging areas are located within three EJ communities. Because dirt would not be exported and cut-and-cover station excavation would not occur in these staging areas, the cumulative effects during the duration of construction would be substantially less than at the seven station areas. Two stations are located entirely within EJ communities and three stations are located entirely in non-EJ communities. The remaining two stations are located in areas that have both EJ and non-EJ communities.

As described in Section 6.0, construction effects would be greatest where dirt is exported from the TBM (Wilshire/La Brea, Century City, and Westwood/VA Hospital) and where station cut-and-cover construction occurs in the street right of way (Wilshire/La Brea, Wilshire/Fairfax, Wilshire /La Cienega, Wilshire/Rodeo, Century City, and Westwood/UCLA (on-street)). Based on this information, the magnitude or intensity of the combined cumulative and indirect proximity effects would be greater at two stations, the Wilshire/La Brea and Century City stations. The Wilshire/La Brea Station is surrounded by four communities, two non-EJ communities to the north (Mid-City West/Fairfax and Hancock Park) which each occupy 25 percent of the construction impact zone, and two EJ communities to the south (Wilshire Park and Miracle Mile) which each occupy 25 percent of the construction impact zone. Because equal areas of EJ and non-EJ communities are located within the construction impact zone for the Wilshire/La Brea Station, a higher magnitude of impacts at this station location would not be borne an EJ community. The Century City station is located within a non-EJ community (Century City) and would subject that non-EJ community to the higher magnitude of impacts that would occur at that station location. Based on the distribution of communities within the Century City and Wilshire/La Brea station areas, the combined cumulative

¹Residences were counted as one sensitive use per station area because of their relatively equal distribution. There were no residences within the Westwood/UCLA and Westwood/VA Hospital station area construction impact zone, which are both located around EJ communities.

and indirect intensity and magnitude of construction impacts would be borne more by the non-EJ communities than the EJ communities.

For the remaining five stations and alignment, the broad distribution of proximity effects throughout the LPA route strongly suggests that the combined cumulative and indirect intensity and magnitude of construction and operational effects in EJ communities compared to non-EJ communities would be negligible.

7.4 Step Four – Assess Whether Mitigation and Enhancement Measures will be Taken

Step four of the Benefits and Burdens analysis requires an assessment of whether mitigation and enhancement measures will be taken.

Mitigation measures to reduce adverse effects were identified in Section 6.0. These mitigation measures would apply uniformly to EJ and non-EJ communities. Although the proposed mitigation measures would reduce the effects of the LPA and the effects would be temporary, the LPA would result in substantial adverse effects to air quality and traffic during construction after the implementation of mitigation. There are no further feasible mitigation measures to reduce the substantial adverse effects of the LPA. However, within the seven major station construction areas where substantial adverse effects would occur, two areas would result in impacts only in EJ communities, three areas would result in impacts only in non-EJ communities, and two areas would result in impacts to both EJ and non-EJ communities.

7.5 Step Five – Assess Whether There are Off-setting Benefits to EJ Communities

Step five of the Benefits and Burdens analysis requires an assessment of whether there are off-setting benefits to EJ communities.

Effects of the LPA will result in benefits to the community as a whole and transit users. The LPA would result in a significant reduction in vehicle miles traveled thereby reducing pollutant emissions and benefiting air quality. The addition of a heavy rail transit system would also provide the infrastructure to accommodate transit oriented development, which can improve quality of life by providing housing and a mix of uses within walking distance to public transportation and providing additional benefits to the environment, such as an increased sense of identity for communities. The benefits to transit users include increased transit options, improved mobility, proximity to transit links, and access to employment and activity centers. Traffic and transit performance will improve within the Study Area, and these benefits can be realized by all populations. There are seven stations proposed for the LPA, with four located in, or adjacent to EJ communities. Therefore, people living in EJ communities will have the same opportunity to access the transit and mobility improvements.

The LPA would benefit users with improved travel times and more linked daily trips. The LPA will provide enhanced grade-separated transit service that would better serve the same communities that are now served by the 720 and 20. The LPA would not result in travel time impacts to EJ communities.

Table 7-2 shows the estimated corridor-specific travel times during the peak and off-peak periods for the LPA. For example, traveling westbound by bus from Wilshire/Western to Westwood/VA Hospital

would take approximately 53 minutes under No Build or the Baseline, compared to 16 minutes under the LPA. Even by car, driving the same distance would be only 15 minutes faster than No Build or Baseline, but 24 minutes slower than the LPA.

Traveling from Wilshire/Western to Westwood/VA Hospital under No Build or the Baseline would take approximately 50 minutes by bus, but only 19 minutes by subway under the LPA. Traffic congestion is lower during the off-peak, but even with improved auto times, the subway is still faster than driving for the LPA.

Using regional performance measures, ridership, mode of access, and travel time, it is possible to assess the transportation benefits of the LPA.

The LPA would benefit users with more linked daily trips because as the number of subway stations increases, the number of auto trips declines and the number of transit trips increases. With more stations, there are more opportunities for people to begin or end new trips on the subway. However, if the LPA is constructed under the Phased Construction Scenario, the benefits of the full LPA to Westwood/VA Hospital will occur later than under the Concurrent Construction Scenario. Since Phase 1 will terminate at the Wilshire/La Cienega Station, transit benefits to points west of this station will not be as significant as under the full LPA to Westwood/VA Hospital. Likewise, since Phase 2 will terminate at the Century Station, transit benefits to points west of this station will not be as significant as under the full LPA to Westwood/VA Hospital. The delayed transit user benefits will be the same in EJ communities and non-EJ communities along the LPA.

Although users within the corridor would benefit from the LPA, it is also important to determine if impacts would occur to users outside of the project corridor who would typically access the area. Table 7-2 shows the user benefits for census tracts throughout the region. As shown, the vast majority of users would experience improved travel times which would be a benefit. No adverse impacts are anticipated for minorities or low-income communities in the periphery of the Study Area.

Table 7-2: LPA Travel Time Comparison

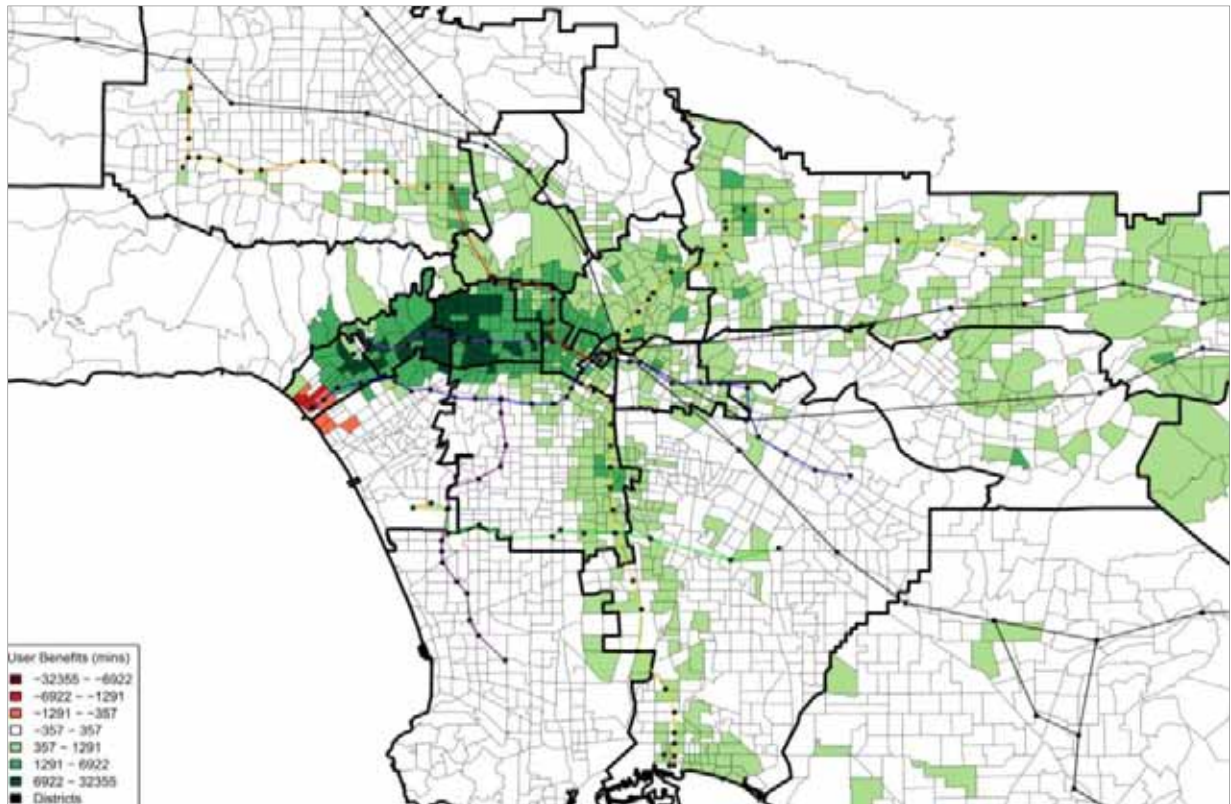
Century City Station Location	Direction/ Time	From	To	Subway Time (min)	No Build Bus Time (min)	Baseline Bus Time (min)	Auto Time (min)
Century City Santa Monica	WB/Peak	Wilshire/Western	Westwood/VA Hospital	16.5	53.5	52.7	39.8
	EB/Peak	Westwood/VA Hospital	Wilshire/Western	16.4	40.9	37.6	28.4
	WB/Off-Peak	Wilshire/Western	Westwood/VA Hospital	19.5	50.1	50.1	23.5
	EB/Off-Peak	Westwood/VA Hospital	Wilshire/Western	19.4	50.2	50.2	23.5
Century City Constellation	WB/Peak	Wilshire/Western	Westwood/VA Hospital	16.8	53.5	52.7	39.8
	EB/Peak	Westwood/VA Hospital	Wilshire/Western	16.7	40.9	37.6	28.4
	WB/Off-Peak	Wilshire/Western	Westwood/VA Hospital	19.8	50.1	50.1	23.5
	EB/Off-Peak	Westwood/VA Hospital	Wilshire/Western	19.7	50.2	50.2	23.5

Source: Metro Travel Demand Mode, 2010.

WB = Westbound; EB = Eastbound.

Transit times include wait times equal to half of headways.

Figure 7-1. User Benefits Distribution, Baseline Alternative vs. the LPA (with Century City Constellation) Daily All Purposes, Production



7.6 Conclusions Related to Environmental Justice

Based on the benefits and burdens analysis completed above, no disproportionately high and adverse effects would occur to EJ communities as a result of the project. Construction activities will occur at stations and staging areas throughout the Study Area and will affect both EJ and non-EJ communities alike. Transit service is meant to serve where the demand is greatest, and these areas are often within neighborhoods that have EJ populations and communities of concern. Although populations adjacent to the alignment will be affected the most by operational and construction-related impacts, these groups include EJ and non-EJ populations, and they will also receive improved transit access. The increased connectivity would also reduce the number of transfers which would have a beneficial economic impact to elderly and low-income communities. The project would also allow easier access to major employment centers.

8.0 CEQA DETERMINATION

Neither the California Environmental Quality Act (CEQA) statute nor its implementing guidelines refer specifically to the topic of environmental justice. CEQA is primarily focused on identifying and disclosing potential significant impacts to the physical environment, and socioeconomic effects are of secondary importance. CEQA does, however, place major emphasis on the disclosure of environmental changes to all potentially affected communities regardless of socioeconomic status. As an element of the physical environment, CEQA does recognize in its guidelines that the displacement of a substantial number of affordable housing units, necessitating construction of replacements would constitute a significant environmental impact.

8.1 No Build Alternative

The No Build Alternative includes all existing highway and transit services and facilities, and the committed highway and transit projects in the 2009 Metro LRTP and the 2008 SCAG RTP.

The No Build Alternative would not displace affordable housing. No significant impacts are anticipated under CEQA.

8.2 Locally Preferred Alternative—Westwood/VA Hospital Extension

The LPA would not displace affordable housing. No significant impacts are anticipated under CEQA.