Federal Agency Comments and Responses
Your concerns have been noted. Since the Draft EIS/EIR was published, Metro has continued to meet with the Department of Veterans Affairs (VA) regarding the station locations at the West Los Angeles Healthcare Center campus of the VA Greater Los Angeles Healthcare System. Some modifications to the Westwood/VA Hospital Station North and South Station plans have been made to address the concerns raised. Since the publication of the Draft EIS/EIR, Metro has held meetings with the VA to address concerns.

The following briefly describes some of the refinements based on comments. For a more detailed description, refer to Section 2.6.4 in this Final EIS/EIR. The Westwood/VA Hospital South Station has been shifted north from the location evaluated in the Draft EIS/EIR. The station box and entrances in the Draft EIS/EIR was situated in the middle of the VA Hospital parking lot. Based on feedback from the VA and the public, the station box was shifted to the far northern end of the parking lot. By shifting the station box to the edge of the parking lot, the VA would be able to more easily develop their property in the future because they would not be constrained by the station box and entrances in the middle of the lot. Additionally, by shifting the station closer to Wilshire Boulevard, public access to the station and circulation would be improved, which was a major concern raised by the public in comment on the Draft EIS/EIR. A comprehensive station circulation study was undertaken during preparation of the Final EIS/EIR, which included recommendation to improve access to the Westwood/VA Hospital Station. This station location further away from the VA Hospital also facilitates a clearer delineation between station activities, near Wilshire Boulevard, and VA activities, on the VA Campus, which was a concern of the VA. Shifting the station box resulted in modifying the locations of the station entrances. In addition, a comprehensive urban design study was conducted during the preparation of the Final EIS/EIR, which resulted in additional station design enhancements as described in Section 2.6.4 that were not included in the Draft EIS/EIR.

In the Draft EIS/EIR, the Westwood/VA Hospital Station included an at-grade entrance plaza and double platforms. For the Final EIS/EIR the station concept for the Westwood/VA Hospital Station was redesigned as described in Section 2.6.4.

The location of the replacement parking was not defined in the Draft EIS/EIR. During the development of the Final EIS/EIR, the replacement parking needs at the VA were better defined. Based on discussions with the VA, plans were developed for both temporary replacement parking and a permanent replacement parking structure, which are included in the Final EIS/EIR and described above.

Likewise, the station box for the Westwood/VA Hospital North Station has been refined from the Draft EIS/EIR. As with the Westwood/VA Hospital South Station, in the Draft EIS/EIR, the Westwood/VA Hospital North Station included an at-grade entrance plaza and double platforms. For the Final EIS/EIR, the station concept for the Westwood/VA Hospital North Station was redesigned as described above. In addition, the size of the construction
589-1

staging and laydown area has been expanded from the Draft EIS/EIR to accommodate a TBM launch site in the Final EIS/EIR.

In addition, to the refinements to improve traffic circulations, provide parking replacement and security, a Memorandum of Agreement (MOA) was signed putting measures in place to ensure that historic elements of the site were maintained and any adverse effects would be avoided. Refer to Appendix D for a complete copy of the MOA and Section 4.14 for a discussion of the historic elements of the VA property.

Metro will continue to coordinate with the Department of Veterans Affairs as the project moves into final design.

Page 2.
Mr. David Miegcr

Attached are our comments relative to the two options for our campus under the assumption that Alternative 2 would be the selected alternative as it is the most financially feasible (Westside Subway Extension, Draft Environmental Impact Statement Environmental Impact Report, Page 6-4). For questions or additional information, please contact Ralph Tillman, Chief of Communications and Public Affairs at (310) 268-3348.

Sincerely,

[Signature]
Donna M. Baier, R.N., M.S.N.
Director
Your concerns regarding the Westwood VA Hospital South station location and associated potential impacts have been noted. Since the publication of the Draft EIS/EIR Metro has held meetings with the Department of Veterans Affairs to address concerns. The south station location has been modified to respond these concerns. To review the modifications refer to Section 2.6.4 in this Final EIS/EIR.

Construction lay down areas (temporary storage areas for equipment and materials), site ingress/egress access points and construction sequencing of activities were identified and refined during the Final EIS/EIR with coordination with the Department of Veterans Affairs. During construction of the project, the existing number of traffic lanes will be maintained in the morning and afternoon commute peak periods. Access to VA buildings south of Wilshire Boulevard will also be maintained at all times. In addition, continuous coordination with the Department of Veterans Affairs, Caltrans, County of Los Angeles and City of Los Angeles Department of Transportation (LADOT) will take place throughout the design process. Future building plans and construction projects will be taken into consideration. For more detail regarding the construction activities refer to Section 3.6.5.
Your comments regarding concerns about the Westwood VA Hospital North station location and associated potential impacts have been noted. Since the publication of the Draft EIS/EIR, Metro has held meetings with the Department of Veterans Affairs to address concerns. The north station location has been modified to respond these concerns. To review the modifications refer to Section 2.6.4 in this Final EIS/EIR.

Construction lay down areas (temporary storage areas for equipment and materials), site ingress/egress access points and construction sequencing of activities were identified and refined during the Final EIS/EIR with coordination with the Department of Veterans Affairs. During construction of the project, the existing number of traffic lanes will be maintained in the morning and afternoon commute peak periods. Access to VA buildings north of Wilshire Boulevard will also be maintained at all times. In addition, continuous coordination with the Department of Veterans Affairs, Caltrans, County of Los Angeles and City of Los Angeles Department of Transportation (LADOT) will take place throughout the design process. Future building plans and construction projects will be taken into consideration. For more detail regarding the construction activities refer to Section 3.6.5.

The construction of a subway station on the North Campus would also impact future construction projects by inhibiting free flowing traffic during construction and permanently after the station is activated. The projects include the seismic retrofit of 11 buildings throughout the north campus, and the construction of a new Nursing Home Care Unit, VA National Cemetery Administration Columbarium, and the restoration of three buildings for homeless housing. In addition, we currently have a 36-year contract with the local non-profit organization Veterans Park Conservancy to construct a Veterans Memorial Park within the proposed portal location. This agreement will create a healing environment for Veterans and their loved ones as part of our Patient-Centered care initiative. Plans are currently under development for integrating this healing space with our existing mental health, recreational and occupational programs.
Since the publication of the Draft EIS/EIR, some modifications to the Westwood/VA Hospital Station North and South Station plans have been made to address the concerns raised. For a more detailed description, refer to Section 2.6.4 in this Final EIS/EIR and the response to comment 589-1.

In anticipation of riders accessing stations by bus, walk, and bike, additional transportation studies were carried out. Results of the station circulation study helped direct further design of subway stations and supported station area planning for the project. The station area planning examined access opportunities and potential improvements in the neighborhoods surrounding subway stations. Please refer to the Westside Subway Extension Station Circulation Report and Chapter 3 of the Final EIS/EIR for more details and results of the study.

To recognize the future role that local bus service will play, the project conducted a study of potential service enhancements in station areas, including the Westwood/VA Hospital Station. The study had two major goals:

- Suggest changes in the bus network that feeds the planned subway extension, particularly for routes that closely parallel the subway alignment for a significant portion of their route.

- Define operational needs at subway stations, including space for stops and layovers and primary transfer locations. This in turn will guide station designers in locating physical features such as bus stops, turnarounds/bus loops, and station entrances.

Results of the study were incorporated into Section 3.6.5 of this Final EIS/EIR.

For the Westwood/VA Hospital South Station option, a parking structure providing both permanent and temporary replacement parking would be located in the existing physician's parking lot, east of the VA Hospital. As part of the LPA, temporary replacement parking would also be located in a new lot south of the VA Hospital and east of Bonsall Avenue. In addition, at the Westwood/VA Hospital Station in the parking lot north of the VA Hospital, existing parking for persons with disabilities would not be displaced during construction.

For the Westwood/VA Hospital North Station option, existing parking for persons with disabilities would not be displaced during construction. However, a number of spaces would be removed to accommodate the construction laydown area north of Wilshire Boulevard.

Your comments regarding additional law enforcement staff requirements have been noted. Currently, Metro contracts security and law enforcement services with Los Angeles County Sheriff's Department Transit Services Bureau, now part of the Homeland Security Division. Security, cameras, and law enforcement for MTA facilities is provided 24 hours per day.
seven days per week. Criminal reports or arrests, other than those accomplished by special enforcement deputies, remain the jurisdiction for local law enforcement agency where the activity occurs.

Thank you for your comments concerning the VA Campus in the event of a threat or attack. Metro is committed to: following risk assessment processes performed by Federal agencies on their sites. The VA notes in the comment letter that such a risk assessment, the VA Vulnerability Assessment, has been done and the campus has been determined to be a "soft target". Mitigation measure SS-7 implements security features, including security education and employee, training specific to terrorism awareness, lighting, communication devices (e.g. passenger telephones), closed circuit television, signs, and other design features to reduce terrorism activities.

Design of the transit facilities will also apply Crime Prevention Through Environmental Design (CPTED) concepts and strategies, which will incorporate security considerations into designing, planning, and building of transit facilities. CPTED strategies could include (but would not be limited to): designing features to maximize visibility; illuminating common/open areas; considering placement and height of landscaping; establishing access control; and general facility maintenance. For more information refer to Section 4.12 in this Final EIS/EIR.

Your comment regarding traffic congestion at the Westwood/VA Hospital Station has been noted. A comprehensive station access circulation study was conducted for this station due to feedback from both the VA and the public. The recommendations resulting from this study are available in the Westside Subway Extension Station Circulation Report. The report considered pedestrian access, bicycle access, bus access, and auto access to the Westwood/VA Hospital Station and resulted in a detailed urban design concept for the Westwood/VA Hospital Station—both the North and South locations.

Metro Rail Design Criteria identifies auto access at stations as a lower priority than pedestrian, bicycle, and bus access. By prioritizing the modes, the Design Criteria indicate that it is more important to minimize trade-offs that will negatively affect pedestrian and bicycle modes than to minimize trade-offs that will affect auto modes. However, using a more managed approach to station access that balances all modes could help to minimize the overall right-of-way needed because non-automobile modes (bus, pedestrian, and bicycle) can transport more people in less space than will be required if the same number of people traveled via automobile. As described in Section 2.6 of this Final EIS/EIR, a passenger drop-off area will be provided at the Westwood/VA Hospital Station, allowing riders to be dropped off or picked up. Public parking will not be provided.

Section 3.5 of this Final EIS/EIR includes an intersection-level traffic analysis to determine
whether the LPA will result in additional traffic congestion at the local level, including in the vicinity of the Westwood/VA Hospital Station, due to passengers accessing the station. This analysis concluded that the LPA, including the Westwood/VA Hospital Station, will not negatively impact any analyzed Study Area intersections in the vicinity of the Westwood/VA Hospital Station.

Please refer to Section 8.8.5 and 8.8.9 of the Final EIS/EIR for more detailed responses to concerns related to the Westwood/VA Hospital Station and traffic circulation. Refer to Section 7.3 of the Final EIS/EIR and the Westside Subway Extension Westwood/UCLA Station and the Westwood/VA Hospital Station Locations Report for a comparison of the two Westwood/VA Hospital locations. In addition, the Westside Subway Extension Station Circulation Report provides a comprehensive station access circulation study of the Westwood/VA Hospital Station and Section 3.5 provides an analysis of potential impacts to traffic circulation. All reports are available on the Metro Westside Subway Extension Project website: www.metro.net/projects/westside/westside-reports.
Your concerns about bus service at the VA Campus have been noted. Since the publication of the Draft EIS/EIR Metro held meetings with the Department of Veterans Affairs to address concerns. Both the Westwood/VA Hospital North and South station locations have been modified to respond to concerns including station access and circulation as well bus service.

Local bus service will be an important access mode to high-capacity transit stations. The Westside Subway Extension Project Study Area includes substantial transit service, and many local and Rapid bus routes provide frequent service, particularly in peak demand periods.

To recognize the future role that local bus service will play, the Project conducted a study of potential service enhancements in station areas. The study has two major goals:

- Suggest changes in the bus network that feeds the planned subway extension, particularly for routes that closely parallel the subway alignment for a significant portion of their route.
- Define operational needs at subway stations, including space for stops and layovers and primary transfer locations. This in turn will guide station designers in locating physical features such as bus stops, turnarounds/bus loops, and station entrances.

Locating bus stops in relation to subway entrances is a key consideration for bus/rail interface. There also is a need to preserve as much sidewalk capacity as possible to accommodate rail passengers and other pedestrians.

With regard to potential operational features of local bus service, bus cut-outs (off-line stops) are not always preferable to on-street (on-line) stops due to potential conflicts when buses reenter traffic. The majority of bus stops at existing Red/Purple Line stations (North Hollywood, Universal City, and Union Stations excluded) involve on-line facilities.

To assess potential future access improvements to subway stations, project design efforts included a study of circulation needs in each station area, including access to local bus networks. The results of this study are available in the Westside Subway Extension Station Circulation Report and Section 3.7 of this Final EIS/EIR. To ensure the best connection to local bus service, the following mitigation measure is included in the Final EIS/EIR:

- T-16—Study Bus-Rail Interface: Metro will continue to assess bus-rail interface. As a result of further study, Metro, working with affected jurisdictions, will relocate bus stops at some LPA stations to minimize the number of streets riders must cross to transfer between the LPA and interfacing bus lines.

Please refer to Section 8.8.8 of the Final EIS/EIR for more detailed responses to concerns related to station connectivity. In addition, the Westside Subway Extension Station Circulation Report provides a comprehensive station access circulation study of Project...
stations and Section 3.7 provides an analysis of potential impacts to the bus network. All reports are available on the Metro Westside Subway Extension Project website: www.metro.net/projects/westside/westside-reports.

Your comment regarding construction impacts on the VA Campus have been noted. Since the Westwood/VA Hospital Station would be the terminus of the LPA, it has been identified as a potential TBM launch site. Metro has and will continue to coordinate with the VA regarding construction activities planned on the VA Campus. Refer to Appendix E and Section 4.15 of the Final EIS/EIR for a description and schedule of planned construction activities, an analysis of construction impacts and recommended mitigation measures.

Your comment regarding noise and vibration during construction has been noted.

The greatest noise impacts will occur near stations, tunnel access portals, and construction laydown areas where construction activities at the surface are concentrated. In addition, haul routes will experience increased truck traffic, which could add to traffic noise. With the exception of these areas, all other construction will occur completely below-grade. Section 4.15.3 of this Final EIS/EIR analyzes construction noise impacts and mitigation measures.

When the construction site for the station box is open, noise from construction equipment will be audible at street level and result in an adverse effect. This time period will produce the highest levels of construction noise. The excavation and installation of street decking is expected to last four to five months. As the excavation continues below street level, the noise of construction will be reduced because the sides of the excavated opening will act as a sound barrier. Eventually when the surface opening is covered with temporary decking, construction noise at the surface will no longer be noticeable above the traffic noise. Therefore, the excavation of the station box will result in a temporary adverse noise effect.

To reduce the potential for noise and vibration impacts to schools associated with construction, Metro's plans, specifications, and estimates (bid) documents will include measures to comply with the City of Los Angeles, City of Beverly Hills, and County of Los Angeles noise ordinances during construction hours. To further reduce noise impacts during construction, 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
Although mitigation measures will help to reduce noise impacts during construction, an adverse construction noise effect will remain after mitigation in the construction areas. In addition to noise impacts, construction of the LPA could result in vibration impacts before mitigation is implemented. 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 ground-borne noise levels in buildings at the surface, depending on the depth of the tunnel and soil conditions. Tunneling under residences and schools will occur for a limited time. The TBM tunnels between 30 and 100 feet per day. For an average residence or business, this means that the TBMs would be below the surface of that structure for no more than a day or two. Since underground construction is expected to occur continuously over a 24-hour day, there is the potential for the tunnel boring operation to be audible during nighttime sleep hours when background noise levels inside residential buildings are very low. However, as indicated, the period for this potential disruption would be limited to a few days or less and mitigation measures would be implemented to minimize impacts.

The contractor will be responsible for the protection of vibration-sensitive historic buildings or cultural resource structures within 200 feet of any construction activity. To ensure that noise and vibration impacts associated with construction are below threshold levels, Metro's plans, specifications, and estimates (bid) documents will include the following measures:

- 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
If the Metro ground-borne noise limits or ground-borne vibration limits are exceeded during tunneling, the contractor will be required to take action to reduce vibrations to acceptable levels. Such action could include reducing the muck train speed, additional rail and tie isolation, and more frequent rail and wheel maintenance. However, there were no substantiated noise-level complaints made during tunneling for the Metro Gold Line Eastside Extension. Therefore, with mitigation, there will be no construction-related vibration adverse effects due to tunneling activities.

Refer to Section 4.15 of the Final EIS/EIR for more detailed information on construction noise and vibration impacts.

Your comments regarding security during construction have been noted. Please refer to the response to comment 589-5 regarding security issues and Metro's commitment to following the risk assessment process performed by Federal agencies of their sites and conducting a threat and vulnerability assessment.
Your concerns regarding parking impacts at the VA Campus have been noted. Since the publication of the Draft EIS/EIR, Metro held meetings with the Department of Veterans Affairs to address these concerns.

As a result of these meetings, two mitigation measures were added to Chapter 3 of the Final EIS/EIR:

- Monitor spillover parking at VA lots controlled only by decals and/or signage
- Assess magnitude of spillover parking and, if determined unenforceable by VA security, develop parking management plan for VA campus.

Additionally, a parking structure providing both permanent and temporary replacement parking would be located in the existing physician’s parking lot, east of the VA Hospital. Temporary replacement parking would also be located in a new lot south of the VA Hospital and east of Bonsall Avenue. In the parking lot north of the VA Hospital, existing parking for persons with disabilities would not be displaced during construction. Please refer to Section 8.8.5 and 8.8.8 of the Final EIS/EIR for more detailed responses to concerns related to the Westwood/VA Hospital Station and parking. In addition, the Westside Subway Extension Station Circulation Report provides a comprehensive station access circulation study of the Westwood/VA Hospital Station and Section 3.6 provides an analysis of potential impacts to parking. All reports are available on the Metro Westside Subway Extension Project website: www.metro.net/projects/westside/westside-reports.
Your comment has been noted. FEMA's Flood Insurance Rate Maps (FIRMs) were used. The Westside Subway Extension would be within the Zone X designation, with the exception of an area on Wilshire Boulevard, between Western Avenue and Crenshaw Boulevard, which is within the Zone X (Shaded). Flood Plains are discussed in section 4.11 of the Final EIS/EIR.
Appendix H - Response to Comments

- All buildings constructed within a coastal high hazard area, (any of the “V” Flood Zones as delineated on the FIRMs), must be elevated on pilings and columns, so that the lowest horizontal structural member, (excluding the pilings and columns), is elevated to or above the base flood elevation level. In addition, the posts and pilings foundation and the structure attached thereto, is anchored to resist flotation, collapse and lateral movement due to the effects of wind and water loads acting simultaneously on all building components.

- Upon completion of any development that changes existing Special Flood Hazard Areas, the NFIP directs all participating communities to submit the appropriate hydrologic and hydraulic data to FEMA for FIRM revision. In accordance with 44 CFR, Section 65.5, as soon as practicable, but not later than six months after such data becomes available, a community shall notify FEMA of the changes by submitting technical data for a flood map revision. To obtain copies of FEMA’s Flood Map Revision Application Packages, please refer to the FEMA website at http://www.fema.gov/businesses/npf/forma.htm.

Please Note:

Many NFIP participating communities have adopted floodplain management building requirements which are more restrictive than the minimum federal standards described in 44 CFR. Please contact the local community’s floodplain manager for more information on local floodplain management building requirements. The Los Angeles County floodplain manager can be reached by calling George De La O, Senior Civil Engineer, at (626) 456-7155.

If you have any questions or concerns, please do not hesitate to call Cynthia McKenzie of the Mitigation staff at (310) 663-7190.

Sincerely,

Gregg Blackburn, CFM, Branch Chief
Floodplain Management and Insurance Branch

cc:
George De La O, Senior Civil Engineer, Los Angeles County
Garret Tien Sing/Salomon Miranda, State of California, Department of Water Resources, Southern Region Office
Cynthia McKenzie, Senior Flood Planner, CFM, DHS/FEMA Region IX
Alessandro Armaglio, Environmental Officer, DHS/FEMA Region IX
Your comment has been noted. See section 4.2 of the Final EIS/EIR for a discussion of displacement impacts and mitigation measures. The following mitigation measures will be implemented to ensure impacts related to displacement and acquisitions are avoided or further minimized.

- **CN-1** - Metro will provide relocation assistance and compensation for all displaced businesses and residences, as required by both the Uniform Act and the California Act. All real property acquired by Metro will be appraised to determine fair market value. Just compensation, which shall not be less than the approved appraisal, will be made to each displaced property owner. Each business and residence displaced as a result of the LPA will be given advance written notice and owners will be informed of their eligibility for relocation assistance and payments under the Uniform Act. It is anticipated that most businesses will relocate and, as such, most jobs will be relocated and will not be permanently displaced. However, there are permanent job losses anticipated. Metro shall coordinate with the appropriate jurisdictions regarding business relocations.

- **CN-2** - While employment loss as a result of property acquisitions will not result in an adverse effect, Metro will propose, where feasible, joint-use agreements for the land it will take for station entrances and construction staging to induce job creation in areas to further reduce the affect of any job loss.

- **CN-3** - For easements, Metro will appraise each property to determine the fair market value of the portion that will be used either temporarily during construction or permanently above and below ground. Just compensation, which shall not be less than the approved appraisal, will be made to each displaced property owner.
Your comment has been noted. Please refer to Sections 4.4 Air Quality and 4.15 Construction Impacts of the Final EIS/EIR for air quality related impacts and specific mitigation measures. As discussed in Section 4.4 the Project would not exceed NAAQSs, CAAQSs, or SCAQMD significance thresholds during operation. Therefore, mitigation measures are not required for operation. The following mitigation measures would be implemented to reduce construction related air quality impacts:

- **CON-6**: Tunnel locomotives (hauling spoils and other equipment to the tunnel heading) will be approved by Metro to meet mine safety (MSHA) standards.
- **CON-7**: Metro and its contractors will set and maintain work equipment and standards to meet SCAQMD standards, including NOx.
- **CON-8**: Monitoring and recording of air quality at the worksites will be conducted. In areas of gassy soil conditions (Wilshire/La Brea and Wilshire/Fairfax work sites), air quality will be continuously monitored and recorded. Construction will be altered as required to maintain a safe working atmosphere. The working environment will be kept in compliance with Federal, State, and local regulations, including SCAQMD and Cal/OSHA standard.
- **CON-9**: Metro specifications will require that contractors not unnecessarily idle heavy equipment.
- **CON-10**: Metro will require its contractors to maintain and tune engines per manufacturer's specifications to perform at EPA certification levels, where applicable, and to perform at verified standards applicable to retrofit technologies. Metro will also require periodic, unscheduled inspections to limit unnecessary idling and to ensure that construction equipment is properly maintained, tuned, and modified consistent with established specifications.
- **CON-11**: Metro will prohibit its contractors from tampering with engines and require continuing adherence to manufacturer's recommendations.
- **CON-12**: Metro will encourage its contractors to lease new, clean equipment meeting the most stringent of applicable Federal or State standards (e.g., Tier 3 or greater engine standards) or best available emissions control technologies on all equipment.
- **CON-13**: Construction equipment and staging zones will be located away from sensitive receptors and fresh air intakes to buildings and air conditioners.
- **CON-14**: Mitigation measures such as watering, the use of soil stabilizers, etc. will be applied to reduce the predicted PM10 levels to below the SCAQMD daily construction threshold levels. A watering schedule will be established to prevent soil stockpiles from drying out.
- **CON-15**: At truck exit areas, wheel washing equipment will be installed to prevent soil from being tracked onto city streets, and followed by street sweeping as required to clean streets.
- **CON-16**: Trucks will be covered to control dust during transport of spoils.
- **CON-17**: To control fugitive dust, wind fencing and phase grading operations, where appropriate, will be implemented along with the use of water trucks for stabilization of surfaces under windy conditions.
- **CON-18**: Surrounding streets at construction sites will be watered by trucks as needed to...
eliminate air-borne dust. In keeping with Metro's prior policy on the Eastside Gold Line, the contractor will water streets in the station area impacted by dust not less than once a day and more often if needed.

- CON-19-Provisions will be made to prevent spillage when hauling materials and operating non-earthmoving equipment. Additionally, speed will be limited to 15 mph for these activities at construction sites.
- CON-20-Provisions will be made to prevent spillage when hauling materials and operating earth-moving equipment. Additionally, speed will be limited to 10 mph for these activities at construction sites.
- CON-21-EPA-registered particulate traps and other appropriate controls will be used where suitable to reduce emissions of particulate matter and other pollutants at the construction site.

The mitigation measures suggested by the U.S. EPA to control fugitive dust were incorporated into Section 4.15 of the Final EIS/EIR and are listed in the response to comment 630-3 above.

The mitigation measures suggested by the U.S. EPA regarding mobile and stationary source controls were included in Section 4.15 of the Final EIS/EIR and are listed in the response to comment 630-3 above.
The mitigation measures suggested by the U.S. EPA regarding administrative controls were incorporated into Section 4.15 of the Final EIS/EIR and are listed in the response to comment 630-3 above.

Your comment regarding hazardous materials during operation and maintenance at the maintenance facilities has been noted. There is the potential for hazardous materials/waste spills to occur; however, it is assumed that the storage and disposal of hazardous materials/waste will be conducted in accordance with all Federal and State regulatory requirements that are intended to prevent or manage hazards and that if a spill does occur, it will be remediated accordingly. No long-term hazardous material impacts are anticipated. Additionally, the following measures will be implemented to mitigate any hazardous materials impacts:

- HAZ-1-Disposal of groundwater from underground structures will comply with the City of Los Angeles Industrial Wastewater Permit if there is any contaminated groundwater leakage into the final structure.
- HAZ-2-In the unlikely event of a major hazardous materials release close to or in the vicinity of the LPA, Metro will develop emergency response procedures in conformance with Federal, State, and local regulations.

Please refer to Section 4.9 of the Final EIS/EIR for a more detailed analysis of hazardous waste and materials.
Your comment has been noted. As stated, Metro does not anticipate major route restructuring of bus routes as a result of the Project. If major bus route restructuring occurs in the future, Metro would consider all impacts, including environmental justice impacts, and would comply with Title VI of the Civil Rights Act.

Appendix H - Response to Comments

Transit Service Changes

Though we note bus service will be reduced in the build alternatives along the subway corridor itself, we commend Metro and FTA for stating within the DEIS that bus service is not planned to decrease substantially as a result of the project:

"With the Build Alternatives, no major route restructuring of bus routes would be anticipated. ...cost savings that would be associated with major bus service changes would not be expected" (p. 2-19)

However, should the project require major route restructuring in the future (due to the need to reduce bus routes to fund construction/operation of the project) Metro and FTA should ensure compliance with Title VI of the Civil Rights Act and identify mitigation for any environmental justice impacts that may result at that time.

We appreciate the opportunity to review this DEIS and look forward to future coordination on the project. When the FEIS is released for public review, please send two copies to the address above (mail code: CED-2). If you have any questions, please contact Connell Dunning, Transportation Team Leader, at 413-947-4161, or Chris Ganson, the lead reviewer for this project, at 415-947-4121 or ganson.chris@epa.gov.

Sincerely,

Connell Dunning, Transportation Team Leader
Environmental Review Office

Enclosures:
Summary of EPA Rating Definitions

cc: David Mieger, Los Angeles Metropolitan Transportation Authority
SUMMARY OF EPA RATING DEFINITIONS*

This rating system was developed as a means to summarize the U.S. Environmental Protection Agency’s (EPA) level of concern with a proposed action. The ratings are a combination of alphabetical categories for evaluation of the environmental impacts of the proposal and numerical categories for evaluation of the adequacy of the Environmental Impact Statement (EIS).

ENVIRONMENTAL IMPACT OF THE ACTION

"LO" (Lack of Objections)
The EPA review has not identified any potential environmental impacts requiring substantive changes to the proposal. The review may have disclosed opportunities for application of mitigation measures that could be accomplished with no more than minor changes to the proposal.

"EC" (Environmental Concerns)
The EPA review has identified environmental impacts that should be avoided in order to fully protect the environment. Corrective measures may require changes to the preferred alternative or application of mitigation measures that can reduce the environmental impact. EPA would like to work with the lead agency to reduce these impacts.

"EO" (Environmental Objections)
The EPA review has identified significant environmental impacts that should be avoided in order to provide adequate protection for the environment. Corrective measures may require substantial changes to the preferred alternative or consideration of some other project alternative (including the no action alternative or a new alternative). EPA intends to work with the lead agency to reduce these impacts.

"EU" (Environmentally Unsatisfactory)
The EPA review has identified adverse environmental impacts that are of sufficient magnitude that they are unsatisfactory from the standpoint of public health or welfare or environmental quality. EPA intends to work with the lead agency to reduce these impacts. If the potentially unsatisfactory impacts are not corrected at the final EIS stage, this proposal will be recommended for referral to the Council on Environmental Quality (CEQ).

ADEQUACY OF THE IMPACT STATEMENT

Category "1" (Adequate)
EPA believes the draft EIS adequately sets forth the environmental impact(s) of the preferred alternative and those of the alternatives reasonably available to the project or action. No further analysis or data collection is necessary, but the reviewer may suggest the addition of clarifying language or information.

Category "2" (Insufficient Information)
The draft EIS does not contain sufficient information for EPA to fully assess environmental impacts that should be avoided in order to fully protect the environment, or the EPA reviewer has identified new reasonably available alternatives that are within the spectrum of alternatives analyzed in the draft EIS, which could reduce the environmental impacts of the action. The identified additional information, data, analyses, or discussions should be included in the final EIS.

Category "3" (Inadequate)
EPA does not believe that the draft EIS adequately assesses potentially significant environmental impacts of the action, or the EPA reviewer has identified new, reasonably available alternatives that are outside of the spectrum of alternatives analyzed in the draft EIS, which should be analyzed in order to reduce the potentially significant environmental impacts. EPA believes that the identified additional information, data, analyses, or discussions are of such a magnitude that they should have full public review at a draft stage. EPA does not believe that the draft EIS is adequate for the purposes of the NEPA and/or Section 309 review, and thus should be formally revised and made available for public comment in a supplemental or revised draft EIS. On the basis of the potential significant impacts involved, this proposal could be a candidate for referral to the CEQ.

Your comment regarding setbacks has been noted. Metro has met with GSA to discuss this issue during the PE phase and will continue to do so as the design progresses.

Please see comment 596-1 above regarding the setback issue.
Your comment on security issues for this proposed project location has been noted. Metro has and will continue to coordinate with GSA regarding safety and security measures including those related to the Homeland Security Presidential Directive (HSPD) - 12 for the 11000 Wilshire Boulevard Federal site.

Your comment on security issues has been noted. Metro has and will continue to coordinate with GSA regarding these issues. Metro will fund safety and security mitigation measures as identified in Section 4.12 and Appendix I, Mitigation Monitoring Report Program of the Final EIS/EIR.

Your comments about construction noise and vibration and the potential impacts on the GSA Campus have been noted.

The greatest noise impacts will occur near stations, tunnel access portals, and construction laydown areas where construction activities at the surface are concentrated. In addition, haul routes will experience increased truck traffic, which could add to traffic noise. With the exception of these areas, all other construction will occur completely below-grade. Section 4.15.3 of this Final EIS/EIR analyzes construction noise impacts and mitigation measures.

When the construction site for the station box is open, noise from construction equipment will be audible at street level and result in an adverse effect. This time period will produce the highest levels of construction noise. The excavation and installation of street decking is expected to last four to five months. As the excavation continues below street level, the noise of construction will be reduced because the sides of the excavated opening will act as a sound barrier. Eventually when the surface opening is covered with temporary decking, construction noise at the surface will no longer be noticeable above the traffic noise. Therefore, the excavation of the station box will result in a temporary adverse noise effect.

To reduce the potential for noise and vibration impacts to schools associated with construction, Metro's plans, specifications, and estimates (bid) documents will include measures to comply with the City of Los Angeles, City of Beverly Hills, and County of Los Angeles noise ordinances during construction hours. To further reduce noise impacts during construction, 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
Although mitigation measures will help to reduce noise impacts during construction, an adverse construction noise effect will remain after mitigation in the construction areas.

In addition to noise impacts, construction of the LPA could result in vibration impacts before mitigation is implemented. 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 ground-borne noise levels in buildings at the surface, depending on the depth of the tunnel and soil conditions. Tunneling under residences and schools will occur for a limited time. The TBM tunnels between 30 and 100 feet per day. For an average residence or business, this means that the TBMs would be below the surface of that structure for no more than a day or two. Since underground construction is expected to occur continuously over a 24-hour day, there is the potential for the tunnel boring operation to be audible during nighttime sleep hours when background noise levels inside residential buildings are very low. However, as indicated, the period for this potential disruption would be limited to a few days or less and mitigation measures would be implemented to minimize impacts.

The contractor will be responsible for the protection of vibration-sensitive historic buildings or cultural resource structures within 200 feet of any construction activity. To ensure that noise and vibration impacts associated with construction are below threshold levels, Metro's plans, specifications, and estimates (bid) documents will include the following measures:

- 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

If the Metro ground-borne noise limits or ground-borne vibration limits are exceeded during tunneling, the contractor will be required to take action to reduce vibrations to acceptable levels. Such action could include reducing the muck train speed, additional rail and tie isolation, and more frequent rail and wheel maintenance. However, there were no substantiated noise-level complaints made during tunneling for the Metro Gold Line Eastside Extension. Therefore, with mitigation, there will be no construction-related vibration adverse effects due to tunneling activities.

Refer to Section 4.15 of the Final EIS/EIR for more detailed information on construction noise and vibration impacts.

Your comment regarding fugitive dust during construction has been noted. Please refer to Section 4.15 of the Final EIS/EIR for a full analysis of construction-related air quality impacts and recommended mitigation measures. Such mitigation include:

- CON-14 - Mitigation measures such as watering, the use of soil stabilizers, etc. will be applied to reduce the predicted PM$_{10}$ levels to below the SCAQMD daily construction threshold levels. A watering schedule will be established to prevent soil stockpiles from drying out.
- CON-15 - At truck exit areas, wheel washing equipment will be installed to prevent soil from being tracked onto city streets, and followed by street sweeping as required to clean streets.
- CON-16 - Trucks will be covered to control dust during transport of spoils.
- CON-17 - To control fugitive dust, wind fencing and phase grading operations, where appropriate, will be implemented along with the use of water trucks for stabilization of surfaces under windy conditions.
- CON-18 - Surrounding streets at construction sites will be watered by trucks as needed to eliminate air-borne dust. In keeping with Metro's prior policy on the Eastside Gold Line, the contractor will water streets in the station area impacted by dust not less than once a day and more often if needed.
- CON-19 - Provisions will be made to prevent spillage when hauling materials and operating non-earthmoving equipment. Additionally, speed will be limited to 15 mph for these activities at construction sites.
- CON-20 - Provisions will be made to prevent spillage when hauling materials and operating earth-moving equipment. Additionally, speed will be limited to 10 mph for these activities at construction sites.
- CON-21 - EPA-registered particulate traps and other appropriate controls will be used where suitable to reduce emissions of particulate matter and other pollutants at the construction site.
Please see comment 596-1 above regarding the setback issue.

Your comment regarding security at the Federal site during construction has been noted. Mitigation measure SS-3-Implement a Construction Safety and Security Plan which includes safety rules, procedures, and policies to protect workers and work sites during construction such as warning and/or notification signs, detours, and barriers and includes compliance with OSHA standards will be implemented. Metro has and will continue to coordinate with the GSA regarding the review of specific construction security mitigation measures. Please see Section 4.12 of the Final EIS/EIR for construction mitigation measures, including safety and security mitigation measures.

Your comment regarding Federal risk assessment processes and the project’s compliance has been noted.

Your comment has been noted. Metro follows CA Code Section 1263.025, “a public entity shall offer to pay the reasonable costs, not to exceed $5,000, of an independent appraisal ordered by the owner of the property that the public entity offers to purchase under a threat of eminent domain…” In working with GSA, Metro would negotiate a payment amount in order for GSA to perform their technical review.

For easements, Metro would appraise each property to determine the fair market value of the portion that would be used either temporarily during construction or permanently below ground. Just compensation, which shall not be less than the approved appraisal, would be made to the GSA.

Your comment regarding Parking and Road Closures has been noted. Discussion of the construction impacts, including those at the Westwood/UCLA Station along with Mitigation Measures can be found in Section 3.6.5 of this Final EIS/EIR. This section identifies possible road closures and other construction-related impacts on transportation. These impacts could involve detours due to construction as well as obstacles to existing transit, parking, bicycle facilities, and pedestrians. For example, during construction traffic control zones would be set up for:

- Wilshire Boulevard between Barrington Avenue and Beverly Glen Boulevard
- Veteran Avenue between Santa Monica Boulevard and Sunset Boulevard
- Gayley Avenue between Le Conte Avenue and Wilshire Boulevard
596-10

- Midvale Avenue between Rochester Avenue and Wilshire Boulevard

Full street closures are not expected at the Westwood/UCLA Station. Spillover parking would not use the site at 11000 Wilshire Boulevard.

596-11

Metro identified cumulative construction impacts which are described in Section 4.17 of the Final EIS/EIR. Prior to and during construction Metro will coordinate closely with all affected parties regarding construction related impacts.
Metro has met with GSA and will continue to do so as the design progresses.

Your comment regarding sustainable design has been noted. Metro will continue to coordinate with the GSA to explore sustainable design options during construction.