Your comment in support of the Westside Subway Extension Project has been noted.

Based on the current funding schedule, the Project is expected to be operational to Westwood/VA Hospital in 2022. As currently planned, the parallel construction of portions of the alignment and stations would allow the entire Project to the Westwood/VA Hospital Station to be open and operational at the same time.

In the event that accelerated federal funding cannot be secured, the Project would be constructed in three sequential phases. The first phase to the Wilshire/La Cienega Station would open in 2020; the second phase to the Century City Station would open in 2026; and the final phase to the Westwood/VA Hospital Station would open in 2036.

The ridership model was based on 2035 population and employment data projections. These ridership predictions were then used to inform the design of the system, including station locations and the number of portals constructed each station.

Your comment in support of the Century City Constellation Station has been noted. On October 28, 2010, the Metro Board of Directors identified Alternative 2 (Westwood/VA Hospital Extension) as the Locally Preferred Alternative (LPA). As part of the LPA selection, the Metro Board of Directors decided to continue to study both station location options in Century City (Santa Monica Boulevard and Constellation Boulevard) to address concerns raised by the community regarding locating a station directly on a seismic fault and the safety of tunneling under homes and schools.

In response to the Metro Board of Director’s request for more information, further analysis was undertaken to focus on the engineering and environmental aspects of the two options during the preparation of the Final EIS/EIR to expand on the studies conducted in preparation of the Draft EIS/EIR. It should be noted that prior to conducting the comparative study, the Santa Monica Boulevard Station location was shifted slightly to the east from the location in the Draft EIS/EIR to avoid the Santa Monica Fault zone.

The geotechnical studies conducted during preparation of the Final EIS/EIR concluded that tunneling can be safely carried out beneath the Beverly Hills High School campus and the West Beverly Hills, Century City, and Westwood neighborhoods. However, these studies also determined that the Century City Santa Monica Station would cross the West Beverly Hills Lineament, a northern extension of the active Newport-Inglewood Fault, which poses a significant safety risk to passengers at this station location. No evidence of faulting was found at the proposed Century City Constellation Station site.

In addition, the Century City Constellation Boulevard Station has the best pedestrian environment, can be expected to attract the most transit riders, and is centrally located to...
help shape the redevelopment of Century City as an important transit-oriented destination on the Westside Subway Extension. Further refinements to the ridership analysis concluded that the Century City Constellation Station would result in 3,350 more boardings along new Westside Subway Extension stations than the Century City Santa Monica Station due to proximity to jobs and residences within the critical 600-foot and 1/4-mile walksheds.

Based on all of these factors, the Century City Station Location Report concluded by recommending that the Century City Station be located along Constellation Boulevard due to seismic safety concerns at the Santa Monica Boulevard Station and higher ridership projections with Constellation Boulevard Station.

Please refer to Section 8.8.2 and 8.8.3 of the Final EIS/EIR for more detailed responses to concerns related to the Century City Station. Refer to Section 7.3 of the Final EIS/EIR and the Westside Subway Extension Century City Station Location Report for a comparison of the two Century City Station locations. The results of further geotechnical investigations in the Century City vicinity can be found in the Westside Subway Extension Century City Area Fault Investigation Report and the Westside Subway Extension Century City Area Tunneling Safety Report. The results of further ridership studies can be found in the Westside Subway Extension Technical Report Summarizing the Results of the Forecasted Alternatives and the Westside Subway Extension Century City TOD and Walk Access Study. All reports are available on the Metro Westside Subway Extension Project website: www.metro.net/projects/westside/westside-reports.

Convenient and safe access by pedestrians and bicyclists will be an important element of the Westside Subway Extension Project. Sidewalks, bicycle lanes, and other facilities along the Project corridor support non-motorized access. To assess potential future access improvements to subway stations, Project design efforts included a study of circulation needs in each station area. The results of this study are available in the Westside Subway Extension Station Circulation Report and Section 3.7 of this Final EIS/EIR. This study provided important guidance on potential station features, including those specifically relating to pedestrian and bicycle access. Areas explored by the study included the following:

- Provision of bicycle facilities at stations
- Enhanced bus shelters and lighting
- Making crosswalks more visible with crosswalk treatments and advance stop bars, increasing safety for pedestrians transferring from buses or traveling to other destinations on foot
- Improving the transit and pedestrian environment with the addition of sidewalk treatments
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.

Section 3.7 of this Final EIS/EIR summarizes the findings of the Station Circulation Report and lists specific measures to be implemented at stations to improve pedestrian and bicycle access. These measures include the following:

- T-5 through T-8—Install Crossing Deterrents/Crossing Deterrents
- T-9—Provide consistency with General Plan Designation Sidewalk Width Adjacent to Metro-Controlled Parcels
- T-10—Provide consistency with General Plan Designation Sidewalk Width Coordination with Jurisdictions
- T-11—Provide High Visibility Crosswalk Treatments
- T-12—Meet Federal, State, and Local Standards for Crossing
- T-13—Meet Metro Rail Design Criteria Minimums for Bicycle Parking
- T-14—Study Bicycle Parking Demand and Footprint Configuration
- T-15—Determine Alternative Sites for Bicycle Parking

Metro is committed to working with local jurisdictions to improve the environment for pedestrians and bicyclists at all Project stations and will continue to assess and refine the needs of pedestrians and bicyclists as the Project progresses into Final Design.

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 pedestrian and bicycle networks. All reports are available on the Metro Westside Subway Extension Project website: www.metro.net/projects/westside/westside-reports.

Your comment on the Wilshire/Crenshaw Station has been noted. A Wilshire/Crenshaw Station was not included in the LPA.

The Wilshire/Crenshaw Station would be located in the Park Mile section of Wilshire Boulevard, adjacent to lower density land uses that are not planned for future growth in the adopted Community Plan and Park Mile Specific Plan. This site is only 0.5 mile from the existing Wilshire/Western Station and does not serve a major north south intersection, as Crenshaw Boulevard terminates at Wilshire Boulevard and does not extend to the north. Because this is a comparatively lower ridership station with a cost of $153 million, eliminating this station from the LPA improves the cost-effectiveness of Alternative 2.
Furthermore, future connections from the Westside subway stations along Wilshire Boulevard to the planned Crenshaw/LAX Light Rail Transit project to the south have been recommended to take place at La Brea, La Cienega, or San Vicente rather than at Wilshire/Crenshaw.

Your comment suggesting the construction of an undeveloped station box for a future station at the Wilshire/Crenshaw Station has been noted. Because the Wilshire/Crenshaw Station would be a comparatively lower ridership station with a cost of $153 million, eliminating this station from the LPA improves the cost-effectiveness of Alternative 2. Furthermore, future connections from the Westside subway stations along Wilshire Boulevard to the planned Crenshaw/LAX Light Rail Transit Project to the south have been recommended to take place at La Brea, La Cienega, or San Vicente rather than at Wilshire/Crenshaw.

Excavating an undeveloped station box for the potential future development of a Wilshire/Crenshaw Station is also not a viable option at this time. The cost of excavating an empty box for a future station adds a considerable cost to the Project and such a station has not been approved at this time for the future (approximately $70 million) or included in the LPA. Additionally, if the station is developed in the future, the process of constructing a full station from an undeveloped station box while the system is operational would present technical challenges that would further increase the station construction costs and would be disruptive to the existing service.

Please refer to Sections 2.3, 2.4, and 2.5 of the Final EIS/EIR for an overview of the development of alternatives, including station locations, and the LPA selection process. The Westside Subway Extension Alternatives Screening and Refinement Following Scoping Report provides a more detailed description of the refinements to the Wilshire/Crenshaw Station following Draft EIS/EIR scoping in response to community comments and engineering requirements. This report is available on the Metro Westside Subway Extension Project website:

www.metro.net/projects/westside/westside-reports

Your comment on future transit connections to a Sepulveda/I-405 line has been noted. The San Fernando Valley I-405 Corridor Connection is included in Metro's 2009 Long Range Transportation Plan and funding has been allocated in Measure R for the project. Metro will undertake planning studies for the corridor to identify the mode, alignment and appropriate connections to other area transit projects, including the Westside Subway Extension.
Your preference for the TSM Alternative has been noted. On October 28, 2010, the Metro Board of Directors identified Alternative 2 (Westwood/VA Hospital Extension) as the Locally Preferred Alternative (LPA). Alternative 2 was selected as the LPA because the analysis in the Draft EIS/EIR demonstrated that the Build Alternatives would be more effective than the TSM Alternative in terms of enhancing mobility, serving development opportunities, and addressing other aspects of the Purpose and Need for the Project. Please refer to Chapter 7 of the Draft EIS/EIR and Section 2.5 of the Final EIS/EIR for information on this analysis.

Furthermore, the Project would not eliminate bus service along Wilshire Boulevard but rather would supplement it with rail. As explained in Chapter 2, Metro Local, Limited, Rapid, and Express bus service along Wilshire Boulevard will continue to operate in conjunction with the rail system, if approved and implemented. The Wilshire Boulevard Bus Rapid Transit project is also assumed to be in place. Maintenance of local bus service levels is an important component of the transit system serving the Westside Corridor. With the extension the Purple Line subway service to the Westwood/VA Hospital Station, it is estimated that one-third of demand would involve local bus access. Metro continues to seek to improve the region’s transit needs and continually evaluates various transit corridors to achieve a more interconnected transportation system. To help guide design of subway stations, potential enhanced local bus service at stations was assessed and is discussed in Chapter 3 of the Final EIS/EIR.

The Project will be funded primarily through a combination of Measure R local funds and Federal New Starts funds, with some other local, State, and Federal funds. Metro will continue to use a combination of local, State, and Federal funding sources to operate and maintain the system. In addition to these funding sources, Metro relies on fare revenues to fund about one-third of its operating costs. Bus operating funds will not be used to construct the Project, and no fare increases or service reductions are proposed to cover the Project’s costs. The selection of the TSM Alternative would not have resulted in lower fares. The Metro Board of Directors establishes fares. Currently, the Base Fare for each boarding is $1.50 and the Metro Day Pass is $5.00. A transfer is the same as the Base Fare - $1.50.

Furthermore, the Westside Subway Extension Project will increase transit options and improve mobility for residents across Los Angeles County, including low-income and minority residents who are transit-dependent. Transit service is meant to serve where the demand is greatest, and these areas are often within neighborhoods that have Environmental Justice (EJ) populations and communities of concern. Four of the seven stations are located in, or adjacent to the Environmental Justice populations identified in Section 4.2.6 of the Final EIS/EIR. Therefore, people living in EJ populations will have the same opportunity to access the transit and mobility improvements provided by the subway.

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. Transit user benefits associated with the LPA are anticipated both along the Project corridor as well as across the region. The transit benefits associated with the LPA are further detailed in Section 3.4 of the Final EIS/EIR.
I am writing to express my strong opposition to having the Constellation Station built in Century City with subway related construction taking place under Beverly Hills High School and the surrounding homes and streets. It should be built under Santa Monica Boulevard as originally proposed. Having the subway built under and around Beverly Hills High School could place students at risk in the event of an earthquake or other disaster. Also, there is a working oil well on the school grounds so there is the risk of causing an environmental disturbance by digging on school grounds.

Patrick J. Burns, Jr., JD
President
Advanced Regulatory Compliance, Inc.
415 N. Camden Drive, Ste. 223
Beverly Hills, CA 90210
Ph (310) 275-7300
Fx (310) 275-7305
Email pburns@advreg.com

Sent on the Sprint® Now Network from my BlackBerry®

Your comment in support of the Century City Santa Monica Station and concerns about tunneling beneath homes and schools has been noted. On October 28, 2010, the Metro Board of Directors identified Alternative 2 (Westwood/VA Hospital Extension) as the Locally Preferred Alternative (LPA). As part of the LPA selection, the Metro Board of Directors decided to continue to study both station location options in Century City (Santa Monica Boulevard and Constellation Boulevard) to address concerns raised by the community regarding locating a station directly on a seismic fault and the safety of tunneling under homes and schools. The Metro Board of Directors also decided to not include the Constellation South alignment between the Wilshire/Rodeo and Century City Stations as part of the LPA, but to continue to study the Constellation North and the Santa Monica Boulevard alignments. The Constellation South alignment passed beneath more residential properties than the Constellation North or Santa Monica Boulevard alignments. In addition, the Metro Board of Directors decided to not include the West or Central alignments between Century City and Westwood/UCLA as part of the LPA, but to continue to study the East alignment because the East alignment is the most direct and least expensive route between the two stations.

Safety, both during construction and eventual operations, is one of Metro’s highest priorities and is one of the key evaluation criteria in selection of the Locally Preferred Alternative (LPA). In response to the Metro Board of Director's request for more information, further analysis was undertaken to focus on the engineering and environmental aspects of the two options during the preparation of the Final EIS/EIR to expand on the studies conducted in preparation of the Draft EIS/EIR. It should be noted that prior to conducting the comparative study, the Santa Monica Boulevard Station location was shifted slightly to the east from the location in the Draft EIS/EIR to avoid the Santa Monica Fault zone.

On most transit tunnel projects, significant portions of the alignment are constructed adjacent to or beneath buildings. The LPA passes beneath homes and schools in these neighborhoods because the curve radius required for subway tunnels is much wider than that required at a typical surface street intersection. The current alignment minimizes tunneling under buildings to the east and west of both the Century City Stations. The station position on Constellation Boulevard requires the tunnel alignment to be under the south portion of Beverly Hills High School Building B in order to reach the station location. There is no reasonable tunnel alignment that does not pass under homes or structures within the Beverly Hills High School campus.

The geotechnical studies conducted during preparation of the Final EIS/EIR concluded that tunneling can be safely carried out beneath the Beverly Hills High School campus and the West Beverly Hills, Century City, and Westwood neighborhoods. The use of state-of-the-art pressurized closed-face TBMs for soft-ground tunneling has greatly improved the control of ground movements such that tunneling can be done with minimal surface settlements. The presence of the tunnels will neither affect the risk to buildings above them during an
earthquake nor change the severity of shaking. Finally, tunnels can be constructed and operated safely in gassy grounds and oil wells do not pose an unmitigatable risk to tunneling.

The additional detailed geotechnical studies also assessed soil conditions and determine the potential for noise or vibration impacts on the surface along the refined alignments. These studies concluded that the predicted vibration and noise levels are within the FTA requirements and operation of the subway is not anticipated to have adverse impacts with the implementation of mitigation, including areas where the tunnels pass beneath homes and schools. During construction, low levels of noise and vibration may be experienced for a day or two as each of the two TBMs pass under a given location. In addition, as the tunnels are driven, construction trains bring supplies to and from the tunnel heading. However, these underground construction noises will also be controlled to be within Metro criteria.

The Westside Subway Extension will not reduce the availability of BHHS for use as an emergency shelter or impact the operations of its use as an emergency shelter. Furthermore, tunneling would not prevent future development of the BHHS campus. The vertical alignment of the tunnel would be 55 to 70 feet below the ground surface (to the top of the tunnel), which would allow for construction of an underground structure over the tunnel at a later date.

These geotechnical studies also determined that the Century City Santa Monica Station would cross the West Beverly Hills Lineament, a northern extension of the active Newport-Inglewood Fault, which poses a significant safety risk to passengers at this station location. No evidence of faulting was found at the proposed Century City Constellation Station site. Tunnels to the east and west of Century City pass through at least two active faults. However, there are numerous tools, designs, and construction means and methods that have been used elsewhere that can be used to safely tunnel through these fault zones.

In addition, the Century City Constellation Boulevard Station has the best pedestrian environment, can be expected to attract the most transit riders, and is centrally located to help shape the redevelopment of Century City as an important transit-oriented destination on the Westside Subway Extension. Further refinements to the ridership analysis concluded that the Century City Constellation Station would result in 3,350 more boardings along new Westside Subway Extension stations than the Century City Santa Monica Station due to proximity to jobs and residences within the critical 600-foot and 1/4-mile walksheds.

Based on all of these factors, the Century City Station Location Report concluded by recommending that the Century City Station be located along Constellation Boulevard due to seismic safety concerns at the Santa Monica Boulevard Station and higher ridership...
projections with Constellation Boulevard Station.

Please refer to Section 8.8.2 and 8.8.3 of the Final EIS/EIR for more detailed responses to concerns related to the Century City Station and alignments and Section 8.8.4 of the Final EIS/EIR for a more detailed response to geotechnical concerns. Refer to Section 7.3 of the Final EIS/EIR and the Westside Subway Extension Century City Station Location Report for a comparison of the two Century City Station locations. The results of further geotechnical investigations in the Century City vicinity can be found in the Westside Subway Extension Century City Area Fault Investigation Report and the Westside Subway Extension Century City Area Tunneling Safety Report. The results of further ridership studies can be found in the Westside Subway Extension Technical Report Summarizing the Results of the Forecasted Alternatives and the Westside Subway Extension Century City TOD and Walk Access Study. All reports are available on the Metro Westside Subway Extension Project website: www.metro.net/projects/westside/westside-reports.
Your preference for the TSM Alternative has been noted. On October 28, 2010, the Metro Board of Directors identified Alternative 2 (Westwood/VA Hospital Extension) as the Locally Preferred Alternative (LPA). Alternative 2 was selected as the LPA because the analysis in the Draft EIS/EIR demonstrated that the Build Alternatives would be more effective than the TSM Alternative in terms of enhancing mobility, serving development opportunities, and addressing other aspects of the Purpose and Need for the Project. Please refer to Chapter 7 of the Draft EIS/EIR and Section 2.5 of the Final EIS/EIR for information on this analysis.

Furthermore, the Project would not eliminate bus service along Wilshire Boulevard but rather would supplement it with rail. As explained in Chapter 2, Metro Local, Limited, Rapid, and Express bus service along Wilshire Boulevard will continue to operate in conjunction with the rail system, if approved and implemented. The Wilshire Boulevard Bus Rapid Transit project is also assumed to be in place. Maintenance of local bus service levels is an important component of the transit system serving the Westside Corridor. With the extension the Purple Line subway service to the Westwood/VA Hospital Station, it is estimated that one-third of demand would involve local bus access. Metro continues to seek to improve the region's transit needs and continually evaluates various transit corridors to achieve a more interconnected transportation system. To help guide design of subway stations, potential enhanced local bus service at stations was assessed and is discussed in Chapter 3 of the Final EIS/EIR.

The Project will be funded primarily through a combination of Measure R local funds and Federal New Starts funds, with some other local, State, and Federal funds. Metro will continue to use a combination of local, State, and Federal funding sources to operate and maintain the system. In addition to these funding sources, Metro relies on fare revenues to fund about one-third of its operating costs. Bus operating funds will not be used to construct the Project, and no fare increases or service reductions are proposed to cover the Project’s costs. The selection of the TSM Alternative would not have resulted in lower fares. The Metro Board of Directors establishes fares. Currently, the Base Fare for each boarding is $1.50 and the Metro Day Pass is $5.00. A transfer is the same as the Base Fare - $1.50.

Furthermore, the Westside Subway Extension Project will increase transit options and improve mobility for residents across Los Angeles County, including low-income and minority residents who are transit-dependent. Transit service is meant to serve where the demand is greatest, and these areas are often within neighborhoods that have Environmental Justice (EJ) populations and communities of concern. Four of the seven stations are located in, or adjacent to the Environmental Justice populations identified in Section 4.2.6 of the Final EIS/EIR. Therefore, people living in EJ populations will have the same opportunity to access the transit and mobility improvements provided by the subway.

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. Transit user benefits associated with the LPA are anticipated both along the Project corridor as well as across the region. The transit benefits associated with the LPA are further detailed in Section 3.4 of the Final EIS/EIR.
Hi...can you please send this to me in a PDF so I can post on our calendar website...Many thanks...S

Metro staff received your request for information and provided the requested document during the public comment period.
Chapter 8 of the Final EIS/EIR provides an overview of the comments received, and general responses to some of the more common or frequent comments. Each comment, including those made verbally at the public hearings, with a response, also appears in Appendix H of the Final EIS/EIR.

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I see that “Metro will respond to all comments received during the Final EIS/EIR phase of the project.” Please direct me to the responses to verbal comments made at the recent Public Hearings.

Thank you for your help.
Hello,

Please direct me to the online presentation for the Sept. 22 Public Hearing in West Hollywood. Also, instruct the carrier of your Web presentations (www.ustream.tv) to eliminate the irritating advertisements that precede the online presentations. Tax money pays for this process, and advertisements are not acceptable.

The webcast for the September 22 public hearing is available on the Metro Westside Subway Extension Project website: www.metro.net/projects/westside.
Your comment in support of the Century City Constellation Station and the West Route as well as concerns about traffic and construction impacts of the Century City Santa Monica Station has been noted. On October 28, 2010, the Metro Board of Directors identified Alternative 2 (Westwood/VA Hospital Extension) as the Locally Preferred Alternative (LPA). As part of the LPA selection, the Metro Board of Directors decided to continue to study both station location options in Century City (Santa Monica Boulevard and Constellation Boulevard) to address concerns raised by the community regarding locating a station directly on a seismic fault and the safety of tunneling under homes and schools. In addition, the Metro Board of Directors decided to not include the West or Central alignments between Century City and Westwood/UCLA as part of the LPA, but to continue to study the East alignment because the East alignment is the most direct and least expensive route between the two stations.

In response to the Metro Board of Director’s request for more information, further analysis was undertaken to focus on the engineering and environmental aspects of the two options during the preparation of the Final EIS/EIR to expand on the studies conducted in preparation of the Draft EIS/EIR. It should be noted that prior to conducting the comparative study, the Santa Monica Boulevard Station location was shifted slightly to the east from the location in the Draft EIS/EIR to avoid the Santa Monica Fault zone.

On most transit tunnel projects, significant portions of the alignment are constructed adjacent to or beneath buildings. The LPA passes beneath homes and schools in these neighborhoods because the curve radius required for subway tunnels is much wider than that required at a typical surface street intersection. The current alignment minimizes tunneling under buildings to the east and west of both the Century City Stations.

The geotechnical studies conducted during preparation of the Final EIS/EIR concluded that tunneling can be safely carried out beneath the Beverly Hills High School campus and the West Beverly Hills, Century City, and Westwood neighborhoods. The use of state-of-the-art pressurized closed-face TBM’s for soft-ground tunneling has greatly improved the control of ground movements such that tunneling can be done with minimal surface settlements. The presence of the tunnels will neither affect the risk to buildings above them during an earthquake nor change the severity of shaking. Finally, tunnels can be constructed and operated safely in gassy grounds and oil wells do not pose an unmitigatable risk to tunneling.

The additional detailed geotechnical studies also assessed soil conditions and determine the potential for noise or vibration impacts on the surface along the refined alignments. These studies concluded that the predicted vibration and noise levels are within the FTA requirements and operation of the subway is not anticipated to have adverse impacts with the implementation of mitigation, including areas where the tunnels pass beneath homes and schools. During construction, low levels of noise and vibration may be experienced for
a day or two as each of the two TBMs pass under a given location. In addition, as the tunnels are driven, construction trains bring supplies to and from the tunnel heading. However, these underground construction noises will also be controlled to be within Metro criteria.

However, these geotechnical studies also determined that the Century City Santa Monica Station would cross the West Beverly Hills Lineament, a northern extension of the active Newport-Inglewood Fault, which poses a significant safety risk to passengers at this station location. No evidence of faulting was found at the proposed Century City Constellation Station site.

In addition, the Century City Constellation Boulevard Station has the best pedestrian environment, can be expected to attract the most transit riders, and is centrally located to help shape the redevelopment of Century City as an important transit-oriented destination on the Westside Subway Extension. Further refinements to the ridership analysis concluded that the Century City Constellation Station would result in 3,350 more boardings along new Westside Subway Extension stations than the Century City Santa Monica Station due to proximity to jobs and residences within the critical 600-foot and 1/4-mile walksheds.

Based on all of these factors, the Century City Station Location Report concluded by recommending that the Century City Station be located along Constellation Boulevard due to seismic safety concerns at the Santa Monica Boulevard Station and higher ridership projections with Constellation Boulevard Station.

Construction impacts of the Project will be temporary and limited in areas as construction proceeds along the length of the Locally Preferred Alternative. Metro will coordinate with affected residents and businesses prior to construction. A detailed survey of community stakeholders and businesses will be conducted. A construction safety campaign will be developed and community response protocols (notification of construction activities, hot lines, etc.) will be produced. A public involvement plan will be developed prior to each construction phase and will be tailored to the construction phase. Metro will maintain the Project website, which will provide information to the public regarding construction phasing. Metro will develop a program tailored for different locations and needs. The program will involve signage and marketing to assistance to businesses, identification of parking alternatives, and other measures.

Metro also considers the cumulative impact of multiple projects in the Study Area under construction at the same time as the subway extension. Careful coordination will occur with local jurisdictions to ensure that potential impacts from the simultaneous construction of multiple projects are addressed and mitigated to the extent feasible.
Traffic impacts associated with LPA construction include reduced roadway traffic lanes and temporary street closures that could result in major traffic disruptions and bottlenecks. These impacts are associated with contractor work and storage areas, stations, crossovers, mining entry/exit locations, TBM operations and support activities, truck haul routes, transportation of oversized construction materials, station entrances, station appendages, grout injection, and drop holes for the LPA and are detailed in Section 3.8.2 of this Final EIS/EIR.

Subway stations are built by excavating the site for the station box and then building the station below ground. If the station is built under a street, it is covered over with concrete decking during construction to allow traffic to continue to flow overhead. Traffic will be disrupted at the beginning of station construction to allow for initial excavation and installation of the concrete decking, and again at the end to remove the decking and reconstruct the street. Section 3.8 details the traffic-control activities during station construction and the duration of each activity.

Street closures will be coordinated with local jurisdictions and the maintenance of traffic lanes during construction will follow local agency requirements and standards with respect to minimum lane widths, the number of available travel lanes, and the duration of temporary lane closures. Specific street closure locations will be identified in close coordination with local agencies during the final design phase.

To minimize impacts to traffic circulation, the following mitigation measures will be implemented during construction:

• TCON-1—Traffic Control Plans
• TCON-2—Designated Haul Routes
• TCON-3—Emergency Vehicle Access
• TCON-4—Transportation Management Plan
• TCON-5—Coordination with Planned Roadway Improvements

T-CON-2, TCON-3, TCON-4, TCON-5 were added during this Final EIS/EIR phase based on additional analysis of construction impacts on traffic circulation and concerns raised by the public. With implementation of the mitigation, construction-related adverse effects on traffic circulation will be reduced for adjacent commercial areas and residential neighborhoods. Although the construction impacts on traffic circulation identified will be temporary, impacts and/or residual impacts after mitigation will remain significant and unavoidable during the construction period.

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
- 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
- TCON-2—Designated Haul Routes
- CON-41—Enclosures for Fixed Equipment

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.

Your concerns about congestion along Santa Monica Boulevard during operation have also been noted. A comprehensive station access circulation study was conducted for all stations, including the Century City Santa Monica Station, due to feedback from 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 station.

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, public parking will not be provided at any stations.

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 Century City Santa Monica Station, due to passengers accessing the station. This analysis concluded that the LPA, including the Century City Santa Monica Station, will not negatively impact any analyzed Study Area intersections in the immediate vicinity of the Century City Santa Monica Station.

Your comments about parking have been noted. Park-and-ride can be an important mode of access to transit. However, these facilities are usually located in low-density areas that lack local bus service feeding the stations. That is not the case with this Project. Therefore, none of the stations proposed as part of the Project will provide parking.

The provision of park-and-ride facilities would be inconsistent with the purpose and need of the Project. The Project Study Area is already very congested and Metro seeks to discourage people from driving to access the subway. Park-and-ride facilities also could lead to increased auto use and potentially result in traffic impacts at intersections.

The provision of park-and-ride facilities also would be inconsistent with both the existing built environment surrounding stations and efforts to encourage transit-oriented development. The Project corridor is very dense due to medium and high density commercial and residential development. The construction of park-and-ride facilities would consume space that could be put to more productive residential and commercial uses.

Any added park-and-ride facilities would have major implications on Project costs. The study area also has very high land costs and there is lack of available parcels for park-and-ride development. Due to land costs and scarcity, any parking would need to be in multi-story garages, resulting in substantially higher capital costs than current estimates.

Please refer to Section 8.8.2 and 8.8.3 of the Final EIS/EIR for more detailed responses to concerns related to the Century City Station and alignments and Section 8.8.4 of the Final EIS/EIR for a more detailed response to geotechnical concerns. Refer to Section 7.3 of the Final EIS/EIR and the Westside Subway Extension Century City Station Location Report for a comparison of the two Century City Station locations. The results of further geotechnical investigations in the Century City vicinity can be found in the Westside Subway Extension Century City Area Fault Investigation Report and the Westside Subway Extension Century City Area Tunneling Safety Report. The results of further ridership studies can be found in the Westside Subway Extension Technical Report Summarizing the Results of the Forecasted Alternatives and the Westside Subway Extension Century City TOD and Walk Access Study. Refer to Section 4.15 of the Final EIS/EIR for more detailed information on construction noise and vibration impacts. Refer to Section 3.8.2 of the Final EIS/EIR and the Westside Subway Extension Construction Traffic Analysis Report for more information on street closures and traffic congestion during construction and Section 3.5 of the Final EIS/EIR for an analysis of congestion during operation. All reports are available on the Metro Westside Subway Extension Project website: www.metro.net/projects/westside/westside-reports
Your preference for the TSM Alternative has been noted. On October 28, 2010, the Metro Board of Directors identified Alternative 2 (Westwood/VA Hospital Extension) as the Locally Preferred Alternative (LPA). Alternative 2 was selected as the LPA because the analysis in the Draft EIS/EIR demonstrated that the Build Alternatives would be more effective than the TSM Alternative in terms of enhancing mobility, serving development opportunities, and addressing other aspects of the Purpose and Need for the Project. Please refer to Chapter 7 of the Draft EIS/EIR and Section 2.5 of the Final EIS/EIR for information on this analysis.

Furthermore, the Project would not eliminate bus service along Wilshire Boulevard but rather would supplement it with rail. As explained in Chapter 2, Metro Local, Limited, Rapid, and Express bus service along Wilshire Boulevard will continue to operate in conjunction with the rail system, if approved and implemented. The Wilshire Boulevard Bus Rapid Transit project is also assumed to be in place. Maintenance of local bus service levels is an important component of the transit system serving the Westside Corridor. With the extension the Purple Line subway service to the Westwood/VA Hospital Station, it is estimated that one-third of demand would involve local bus access. Metro continues to seek to improve the region's transit needs and continually evaluates various transit corridors to achieve a more interconnected transportation system. To help guide design of subway stations, potential enhanced local bus service at stations was assessed and is discussed in Chapter 3 of the Final EIS/EIR.

The Project will be funded primarily through a combination of Measure R local funds and Federal New Starts funds, with some other local, State, and Federal funds. Metro will continue to use a combination of local, State, and Federal funding sources to operate and maintain the system. In addition to these funding sources, Metro relies on fare revenues to fund about one-third of its operating costs. Bus operating funds will not be used to construct the Project, and no fare increases or service reductions are proposed to cover the Project's costs. The selection of the TSM Alternative would not have resulted in lower fares. The Metro Board of Directors establishes fares. Currently, the Base Fare for each boarding is $1.50 and the Metro Day Pass is $5.00. A transfer is the same as the Base Fare - $1.50.

Furthermore, the Westside Subway Extension Project will increase transit options and improve mobility for residents across Los Angeles County, including low-income and minority residents who are transit-dependent. Transit service is meant to serve where the demand is greatest, and these areas are often within neighborhoods that have Environmental Justice (EJ) populations and communities of concern. Four of the seven stations are located in, or adjacent to the Environmental Justice populations identified in Section 4.2.6 of the Final EIS/EIR. Therefore, people living in EJ populations will have the same opportunity to access the transit and mobility improvements provided by the subway.

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. Transit user benefits associated with the LPA are anticipated both along the Project corridor as well as across the region. The transit benefits associated with the LPA are further detailed in Section 3.4 of the Final EIS/EIR.
I would like to express how important it is to extend the METRO to AT LEAST the VA hospital as many veterans find it very difficult to get to their appointments due to traffic and transportation issues. The VA on Wilshire Blvd is the largest VA institution in Southern California and it is imperative that they are able to get to their appointments as the other VA satellite clinics don’t offer full healthcare services.

Thank you,
Gwen Cabrera

Gwen Cabrera, DPT, PT
VA Greater Los Angeles Healthcare System
(310) 478-3711 ext. 48245
gwendolyn.cabrera@va.gov

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409-1

Your support for Alternative 2 (Westwood/VA Hospital Extension) has been noted. On October 28, 2010, the Metro Board of Directors identified Alternative 2 as the Locally Preferred Alternative. Only Alternatives 1 and 2 are affordable within the adopted Long Range Transportation Plan, and between them, Alternative 2 provides significantly higher ridership and better cost effectiveness. Additionally, Alternative 2 serves the VA Hospital and other communities west of the I-405 more effectively.

Please refer to Sections 2.3, 2.4, and 2.5 of the Final EIS/EIR for an overview of the development of alternatives and the LPA selection process.
826-1

Your comment in support of the Century City Constellation Station and station access/ridership projections has been noted. On October 28, 2010, the Metro Board of Directors identified Alternative 2 (Westwood/VA Hospital Extension) as the Locally Preferred Alternative (LPA). As part of the LPA selection, the Metro Board of Directors decided to continue to study both station location options in Century City (Santa Monica Boulevard and Constellation Boulevard) to address concerns raised by the community regarding locating a station directly on a seismic fault and the safety of tunneling under homes and schools.

In response to the Metro Board of Director’s request for more information, further analysis was undertaken to focus on the engineering and environmental aspects of the two options during the preparation of the Final EIS/EIR to expand on the studies conducted in preparation of the Draft EIS/EIR. It should be noted that prior to conducting the comparative study, the Santa Monica Boulevard Station location was shifted slightly to the east from the location in the Draft EIS/EIR to avoid the Santa Monica Fault zone.

During preparation of the Final EIS/EIR, the ridership model from the Draft EIS/EIR was further refined to assess the LPA and incorporate any changes between the Draft EIS/EIR and the Final EIS/EIR. More than ten model runs were conducted to respond to changes, perform additional analysis, and answer questions that were raised during the project development process in the Final EIS/EIR phase. The main types of refinement included feeder bus service, balanced headways and some coding refinement, to determine what changes should be included in the Final EIS/EIR model runs. The refined model predicted boardings along the new Westside Subway Extension stations are approximately 49,300 with the Century City Constellation Station, which is about 3,350 more than the predicted 45,986 boardings at the Century City Santa Monica Station. The main difference in boardings at the Century City Station is the increased walk access trips in the Constellation Option and 13 minutes in the Santa Monica Option. The number of jobs and jobs per square mile in the 1/4-mile and 1/2-mile area around the Century City stations is much higher in the Constellation Option than in the Santa Monica Option.

In addition to the refined ridership model, a supplemental ridership study was prepared to evaluate the relative accessibility of the Century City Station locations to surrounding commercial and residential development within a 1/2-mile walking distance. This data was then used to estimate the number of Westside Subway Extension riders who would walk to and from the stations. It should be noted that these ridership projections only consider those riders who walk to the station and these projections are intended to supplement the ridership forecasts. This analysis concluded that the Century City Constellation Boulevard Station attracts more Westside Subway riders compared to the station location along Santa Monica Boulevard. Based on both existing and projected future development in Century City...
City, the Constellation Station has the highest concentration of jobs and residents within the critical 600-foot and 1/4-mile walksheds. As a consequence, the 14,005 riders estimated to walk to the Century City Station along Constellation Boulevard is approximately 72 percent greater than the approximately 8,145 riders expected to walk to the Santa Monica Boulevard Station. The Constellation Boulevard Station has the best pedestrian environment, can be expected to attract the most transit riders, and is centrally located to help shape the redevelopment of Century City as an important transit-oriented destination on the Westside Subway Extension.

In addition to ridership studies, the geotechnical studies conducted during preparation of the Final EIS/EIR concluded that tunneling can be safely carried out beneath the Beverly Hills High School campus and the West Beverly Hills, Century City, and Westwood neighborhoods. However, these studies also determined that the Century City Santa Monica Station would cross the West Beverly Hills Lineament, a northern extension of the active Newport-Inglewood Fault, which poses a significant safety risk to passengers at this station location. No evidence of faulting was found at the proposed Century City Constellation Station site.

Based on all of these factors, the Century City Station Location Report concluded by recommending that the Century City Station be located along Constellation Boulevard due to seismic safety concerns at the Santa Monica Boulevard Station and higher ridership projections with Constellation Boulevard Station.

Please refer to Section 8.8.2 and 8.8.3 of the Final EIS/EIR for more detailed responses to concerns related to the Century City Station. Refer to Section 7.3 of the Final EIS/EIR and the Westside Subway Extension Century City Station Location Report for a comparison of the two Century City Station locations. The results of further ridership studies can be found in the Westside Subway Extension Technical Report Summarizing the Results of the Forecasted Alternatives and the Westside Subway Extension Century City TOD and Walk Access Study. The results of further geotechnical investigations in the Century City vicinity can be found in the Westside Subway Extension Century City Area Fault Investigation Report and the Westside Subway Extension Century City Area Tunneling Safety Report. All reports are available on the Metro Westside Subway Extension Project website: www.metro.net/projects/westside/westside-reports.
Please do not put the subway under the high school. This will endanger our city as it is a disaster center as well. Use the route along Santa Monica Blvd. instead.

I am a Beverly Hills resident, and live at:
711 North Doheny Drive
Beverly Hills, CA 90210
Sincerely,
Rosemary Hilb Weinglass and
Antonia Carlotta
earthquake nor change the severity of shaking. Finally, tunnels can be constructed and
operated safely in gassy grounds and oil wells do not pose an unmitigatable risk to
tunneling.

The additional detailed geotechnical studies also assessed soil conditions and determine
the potential for noise or vibration impacts on the surface along the refined alignments.
These studies concluded that the predicted vibration and noise levels are within the FTA
requirements and operation of the subway is not anticipated to have adverse impacts with
the implementation of mitigation, including areas where the tunnels pass beneath homes
and schools. During construction, low levels of noise and vibration may be experienced for
a day or two as each of the two TBMs pass under a given location. In addition, as the
tunnels are driven, construction trains bring supplies to and from the tunnel heading.
However, these underground construction noises will also be controlled to be within Metro
criteria.

The Westside Subway Extension will not reduce the availability of BHHS for use as an
emergency shelter or impact the operations of its use as an emergency shelter.
Furthermore, tunneling would not prevent future development of the BHHS campus. The
vertical alignment of the tunnel would be 55 to 70 feet below the ground surface (to the top
of the tunnel), which would allow for construction of an underground structure over the
tunnel at a later date.

These geotechnical studies also determined that the Century City Santa Monica Station
would cross the West Beverly Hills Lineament, a northern extension of the active Newport-
Inglewood Fault, which poses a significant safety risk to passengers at this station location.
No evidence of faulting was found at the proposed Century City Constellation Station site.
Tunnels to the east and west of Century City pass through at least two active faults.
However, there are numerous tools, designs, and construction means and methods that
have been used elsewhere that can be used to safely tunnel through these fault zones.

In addition, the Century City Constellation Boulevard Station has the best pedestrian
environment, can be expected to attract the most transit riders, and is centrally located to
help shape the redevelopment of Century City as an important transit-oriented destination
on the Westside Subway Extension. Further refinements to the ridership analysis
concluded that the Century City Constellation Station would result in 3,350 more boardings
along new Westside Subway Extension stations than the Century City Santa Monica
Station due to proximity to jobs and residences within the critical 600-foot and 1/4-mile
walksheds.

Based on all of these factors, the Century City Station Location Report concluded by
recommending that the Century City Station be located along Constellation Boulevard due
to seismic safety concerns at the Santa Monica Boulevard Station and higher ridership
projections with Constellation Boulevard Station.

Please refer to Section 8.8.2 and 8.8.3 of the Final EIS/EIR for more detailed responses to concerns related to the Century City Station and alignments and Section 8.8.4 of the Final EIS/EIR for a more detailed response to geotechnical concerns. Refer to Section 7.3 of the Final EIS/EIR and the Westside Subway Extension Century City Station Location Report for a comparison of the two Century City Station locations. The results of further geotechnical investigations in the Century City vicinity can be found in the Westside Subway Extension Century City Area Fault Investigation Report and the Westside Subway Extension Century City Area Tunneling Safety Report. The results of further ridership studies can be found in the Westside Subway Extension Technical Report Summarizing the Results of the Forecasted Alternatives and the Westside Subway Extension Century City TOD and Walk Access Study. All reports are available on the Metro Westside Subway Extension Project website: www.metro.net/projects/westside/westside-reports.
Your comment in support of the Westside Subway Extension Project has been noted. On October 28, 2010, the Metro Board of Directors identified Alternative 2 (Westwood/VA Hospital Extension) as the Locally Preferred Alternative. Only Alternatives 1 and 2 are affordable within the adopted Long Range Transportation Plan, and between them, Alternative 2 provides higher ridership and improved cost effectiveness. Additionally, Alternative 2 serves the VA Hospital and other communities west of the I-405 more effectively.

Please refer to Sections 2.3, 2.4, and 2.5 of the Final EIS/EIR for an overview of the development of alternatives and the LPA selection process.

Your support for Alternative 5 (Santa Monica Extension plus West Hollywood Extension) has been noted. On October 28, 2010, the Metro Board of Directors identified Alternative 2 (Westwood/VA Hospital Extension) as the Locally Preferred Alternative (LPA). Only Alternatives 1 and 2 are affordable within the adopted Long Range Transportation Plan (LRTP), and between them, Alternative 2 provides significantly higher ridership and better cost effectiveness. Additionally, Alternative 2 serves the VA Hospital and other communities west of the I-405 more effectively.

The Draft EIS/EIR demonstrated a significant market for a subway serving Santa Monica and West Hollywood. However, there is not sufficient Measure R or other funding available to construct a Santa Monica or West Hollywood subway at this time. The Santa Monica and West Hollywood corridors are included in the Strategic Element of the 2009 Long Range Transportation Plan. Further study could occur should funding be identified and secured in the future. If the LPA is approved for implementation by the Metro Board, the LPA will also be designed so as not to preclude future westward extension of the subway.

Please refer to Sections 2.3, 2.4, and 2.5 of the Final EIS/EIR for an overview of the development of alternatives and the LPA selection process.

Your preference for a modified Westwood/VA Hospital Station location has been noted.

During the Draft EIS/EIR scoping, the public suggested that an additional station should be provided west of I-405 because of the large distance between a Westwood/UCLA and a Wilshire/Bundy Station, as well as a desire to serve communities west of the I-405 more effectively. In response, five proposed stations west of I-405 were studied-two at Westwood/VA Hospital (one north of Wilshire and one south of Wilshire), Wilshire/Federal, Wilshire/Barrington, and Wilshire/Bundy. In analyzing the proposed stations, the potential to serve as a terminus station was an important consideration. In addition, all of the stations...
except for the stations at Westwood/VA Hospital are located too far west to be funded as part of Measure R and beyond the adopted LRTP.

The Wilshire/Federal Station would have been located on a site currently used by the U.S. Army Reserve, and the site was determined to be too small to accommodate the subway station without impacting adjacent historic homes in the VA property. From an engineering perspective, this also would have been a challenging site to construct a subway station because of the sharp curve of Wilshire Boulevard. Therefore, the Wilshire/Federal Station was eliminated from further consideration.

The Wilshire/Barrington Station would be located slightly west of the proposed Wilshire/Federal Station. While the Wilshire/Barrington Station is in a high density area with high ridership potential, comments were received from the community during scoping in opposition to locating a terminus station at Wilshire/Barrington due to traffic congestion and dense development concerns. Furthermore, the Wilshire/Barrington Station was not as evenly spaced between the Westwood/UCLA Station and the Wilshire/Bundy Station as is the Westwood/VA Hospital Station.

The Wilshire/Bundy Station is the farthest west of the terminus station considered and provided better potential transit connections as it aligns with the future planned Expo station at Olympic/Bundy. However, it is beyond Measure R funding.

Based on all of these considerations, and especially the fact that only the Westwood/VA Hospital Station is fundable within Measure R, the Wilshire/Federal, Wilshire/Barrington, and Wilshire/Bundy Stations were eliminated as potential terminus stations for the fundable Measure R alternatives. Both the North and South Options at the Westwood/VA Hospital Station were carried forward for further analysis in the Draft EIS/EIR. The Wilshire/Bundy Station was also carried forward into the Draft EIS/EIR as part of the Santa Monica Extension, which is beyond available Measure R funding, and would not serve as a terminus station.

Your comment regarding accessibility of the Westwood/VA Hospital Station has also been noted. Convenient and safe access by pedestrians and bicyclists will be an important element of the design of all station areas, including the Westwood/VA Hospital Station. 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. Potential impacts to interfacing transportation networks, including bus transit (specifically, the location of bus stops), and pedestrian and bicycle facilities (pedestrian crossings and bicycle lanes) are
In preparation of this Final EIS/EIR, the station box and station entrance for the Westwood/VA Hospital South Station was shifted north from the location evaluated in the Draft EIS/EIR. Based on feedback from the VA and the public, the station box was shifted to the far northern end of the parking lot to allow the VA to more easily develop their property in the future and to improve public access to the station. This station location farther from the VA Hospital also facilitates a clearer delineation between station activities and VA activities on the VA Campus.

Currently, Wilshire Boulevard and Bonsall Avenue are grade-separated with Bonsall Avenue passing beneath Wilshire Boulevard. For the Westwood/VA Hospital South Station, the proposed station entrance, as detailed in Section 2.6 of this Final EIS/EIR, would be located on the Bonsall level, beneath the bus drop-off area to the north of the VA Hospital parking lot. The existing bus drop-off area at the Wilshire level on the north and south sides of Wilshire Boulevard would remain the same. A passenger drop-off area would also be provided on the Wilshire level within the bus drop-off area on the north side of Wilshire Boulevard.

For the Westwood/VA Hospital North Station, the station entrance would be located along the north side of Wilshire Boulevard, just west of Bonsall Avenue and south of the station box on the Bonsall level, as detailed in Section 2.6 of this Final EIS/EIR. The existing bus drop-off area at the Wilshire level on the north and south sides of Wilshire Boulevard would remain the same.

Since the entrance for both the North and South stations are located along Wilshire Boulevard at Bonsall Avenue, on the Bonsall level, there are no major differences between the two stations for the purposes of evaluating station circulation. However, Section 3.7 of this Final EIS/EIR concludes that both the North and South entrance at the Westwood/VA Hospital Station will result in increased hazards to pedestrians and bicyclists due to a design feature or incompatible uses and will conflict with adopted plans or policies related to public transit, bicycle, or pedestrian facilities prior to mitigation. To improve access, the following mitigation measures will be implemented at the Westwood/VA Hospital Station (North or South):

- T-8-Install High-Visibility Crosswalk
- T-9-Provide consistency with General Plan Designation Sidewalk Width Adjacent to Metro-Controlled Parcels
- T-10-Provide consistency with General Plan Designation Sidewalk Width Coordination with Jurisdictions
- T-11-Provide High Visibility Crosswalk Treatments
- T-12-Meet Federal, State, and Local Standards for Crossing
With implementation of these measures, impacts to the interfacing pedestrian and bicycle networks and bus stops will be mitigated to less than significant levels at the Westwood/VA Hospital Station. While it is acknowledged that streets in the vicinity of the Westwood/VA Hospital Station are wide, pedestrian and bicycle movements in the study area can still occur without major barriers. The vicinity of the Westwood/VA Hospital Station does contain a network of sidewalks, including connections between potential future rail station entrances and nearby activities. Escalators will provide easy connections from the bus turnouts on Wilshire Boulevard to the Bonsall level, making transfers between bus and subway relatively convenient.

Please refer to Section 8.8.5 of the Final EIS/EIR for more detailed responses to concerns related to the Westwood/VA Hospital Station. Please refer to Sections 2.3, 2.4, and 2.5 of the Final EIS/EIR for an overview of the development of alternatives, including station locations, and the LPA selection process. The Westside Subway Extension Alternatives Screening and Refinement Following Scoping Report provides a more detailed description of the refinements to the Westwood/VA Hospital Station following Draft EIS/EIR scoping in response to community comments and engineering requirements. 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 Station 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 3.7 provides an analysis of potential impacts to pedestrian, bicycle, and bus networks. All reports are available on the Metro Westside Subway Extension Project website: www.metro.net/projects/westside/westside-reports.
Your comment in support of the Century City Constellation Station has been noted. On October 28, 2010, the Metro Board of Directors identified Alternative 2 (Westwood/VA Hospital Extension) as the Locally Preferred Alternative (LPA). As part of the LPA selection, the Metro Board of Directors decided to continue to study both station location options in Century City (Santa Monica Boulevard and Constellation Boulevard) to address concerns raised by the community regarding locating a station directly on a seismic fault and the safety of tunneling under homes and schools.

In response to the Metro Board of Directors’ request for more information, further analysis was undertaken to focus on the engineering and environmental aspects of the two options during the preparation of the Final EIS/EIR to expand on the studies conducted in preparation of the Draft EIS/EIR. It should be noted that prior to conducting the comparative study, the Santa Monica Boulevard Station location was shifted slightly to the east from the location in the Draft EIS/EIR to avoid the Santa Monica Fault zone.

The geotechnical studies conducted during preparation of the Final EIS/EIR concluded that tunneling can be safely carried out beneath the Beverly Hills High School campus and the West Beverly Hills, Century City, and Westwood neighborhoods. However, these studies also determined that the Century City Santa Monica Station would cross the West Beverly Hills Lineament, a northern extension of the active Newport-Inglewood Fault, which poses a significant safety risk to passengers at this station location. No evidence of faulting was found at the proposed Century City Constellation Station site.

In addition, the Century City Constellation Boulevard Station has the best pedestrian environment, can be expected to attract the most transit riders, and is centrally located to help shape the redevelopment of Century City as an important transit-oriented destination on the Westside Subway Extension. Further refinements to the ridership analysis concluded that the Century City Constellation Station would result in 3,350 more boardings along new Westside Subway Extension stations than the Century City Santa Monica Station due to proximity to jobs and residences within the critical 600-foot and 1/4-mile walksheds.

Based on all of these factors, the Century City Station Location Report concluded by recommending that the Century City Station be located along Constellation Boulevard due to seismic safety concerns at the Santa Monica Boulevard Station and higher ridership projections with Constellation Boulevard Station.

Please refer to Section 8.8.2 and 8.8.3 of the Final EIS/EIR for more detailed responses to concerns related to the Century City Station. Refer to Section 7.3 of the Final EIS/EIR and the Westside Subway Extension Century City Station Location Report for a comparison of the two Century City Station locations. The results of further geotechnical investigations in the Century City vicinity can be found in the Westside Subway Extension Century City Area.
28-1
Fault Investigation Report and the Westside Subway Extension Century City Area Tunneling Safety Report. The results of further ridership studies can be found in the Westside Subway Extension Technical Report Summarizing the Results of the Forecasted Alternatives and the Westside Subway Extension Century City TOD and Walk Access Study. All reports are available on the Metro Westside Subway Extension Project website: www.metro.net/projects/westside/westside-reports.

28-2
Your comment on the Wilshire/Crenshaw Station has been noted. A Wilshire/Crenshaw Station was not included in the LPA.

The Wilshire/Crenshaw Station would be located in the Park Mile section of Wilshire Boulevard, adjacent to lower density land uses that are not planned for future growth in the adopted Community Plan and Park Mile Specific Plan. This site is only 0.5 mile from the existing Wilshire/Western Station and does not serve a major north south intersection, as Crenshaw Boulevard terminates at Wilshire Boulevard and does not extend to the north. Because this is a comparatively lower ridership station with a cost of $153 million, eliminating this station from the LPA improves the cost-effectiveness of Alternative 2. Furthermore, future connections from the Westside subway stations along Wilshire Boulevard to the planned Crenshaw/LAX Light Rail Transit project to the south have been recommended to take place at La Brea, La Cienega, or San Vicente rather than at Wilshire/Crenshaw.

Please refer to Sections 2.3, 2.4, and 2.5 of the Final EIS/EIR for an overview of the development of alternatives, including station locations, and the LPA selection process. The Westside Subway Extension Alternatives Screening and Refinement Following Scoping Report provides a more detailed description of the refinements to the Wilshire/Crenshaw Station following Draft EIS/EIR scoping in response to community comments and engineering requirements. This report is available on the Metro Westside Subway Extension Project website: www.metro.net/projects/westside/westside-reports.

28-3
Your support for Alternative 5 (Santa Monica Extension plus West Hollywood Extension) has been noted. On October 28, 2010, the Metro Board of Directors identified Alternative 2 (Westwood/VA Hospital Extension) as the Locally Preferred Alternative (LPA). Only Alternatives 1 and 2 are affordable within the adopted Long Range Transportation Plan (LRTP), and between them, Alternative 2 provides significantly higher ridership and better cost effectiveness. Additionally, Alternative 2 serves the VA Hospital and other communities west of the I-405 more effectively.

The Draft EIS/EIR demonstrated a significant market for a subway serving Santa Monica.
and West Hollywood. However, there is not sufficient Measure R or other funding available to construct a Santa Monica or West Hollywood subway at this time. The Santa Monica and West Hollywood corridors are included in the Strategic Element of the 2009 Long Range Transportation Plan. Further study could occur should funding be identified and secured in the future. If the LPA is approved for implementation by the Metro Board, the LPA will also be designed so as not to preclude future westward extension of the subway.

Please refer to Sections 2.3, 2.4, and 2.5 of the Final EIS/EIR for an overview of the development of alternatives and the LPA selection process.
The increased connectivity would also reduce the number of transfers which would have a same opportunity to access the transit and mobility improvements provided by the subway.

Furthermore, the Project would not eliminate bus service along Wilshire Boulevard but rather would supplement it with rail. As explained in Chapter 2, Metro Local, Limited, Rapid, and Express bus service along Wilshire Boulevard will continue to operate in conjunction with the rail system, if approved and implemented. The Wilshire Boulevard Bus Rapid Transit project is also assumed to be in place. Maintenance of local bus service levels is an important component of the transit system serving the Westside Corridor. With the extension the Purple Line subway service to the Westwood/VA Hospital Station, it is estimated that one-third of demand would involve local bus access. Metro continues to seek to improve the region's transit needs and continually evaluates various transit corridors to achieve a more interconnected transportation system. To help guide design of subway stations, potential enhanced local bus service at stations was assessed and is discussed in Chapter 3 of the Final EIS/EIR.

The Project will be funded primarily through a combination of Measure R local funds and Federal New Starts funds, with some other local, State, and Federal funds. Metro will continue to use a combination of local, State, and Federal funding sources to operate and maintain the system. In addition to these funding sources, Metro relies on fare revenues to fund about one-third of its operating costs. Bus operating funds will not be used to construct the Project, and no fare increases or service reductions are proposed to cover the Project's costs. The selection of the TSM Alternative would not have resulted in lower fares. The Metro Board of Directors establishes fares. Currently, the Base Fare for each boarding is $1.50 and the Metro Day Pass is $5.00. A transfer is the same as the Base Fare - $1.50.

Furthermore, the Westside Subway Extension Project will increase transit options and improve mobility for residents across Los Angeles County, including low-income and minority residents who are transit-dependent. Transit service is meant to serve where the demand is greatest, and these areas are often within neighborhoods that have Environmental Justice (EJ) populations and communities of concern. Four of the seven stations are located in, or adjacent to the Environmental Justice populations identified in Section 4.2.6 of the Final EIS/EIR. Therefore, people living in EJ populations will have the same opportunity to access the transit and mobility improvements provided by the subway.

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. Transit user benefits associated with the LPA are anticipated both along the Project corridor as well as across the region. The transit benefits associated with the LPA are further detailed in Section 3.4 of the Final EIS/EIR.
Your preference for the TSM Alternative has been noted. On October 28, 2010, the Metro Board of Directors identified Alternative 2 (Westwood/VA Hospital Extension) as the Locally Preferred Alternative (LPA). Alternative 2 was selected as the LPA because the analysis in the Draft EIS/EIR demonstrated that the Build Alternatives would be more effective than the TSM Alternative in terms of enhancing mobility, serving development opportunities, and addressing other aspects of the Purpose and Need for the Project. Please refer to Chapter 7 of the Draft EIS/EIR and Section 2.5 of the Final EIS/EIR for information on this analysis.

Furthermore, the Project would not eliminate bus service along Wilshire Boulevard but rather would supplement it with rail. As explained in Chapter 2, Metro Local, Limited, Rapid, and Express bus service along Wilshire Boulevard will continue to operate in conjunction with the rail system, if approved and implemented. The Wilshire Boulevard Bus Rapid Transit project is also assumed to be in place. Maintenance of local bus service levels is an important component of the transit system serving the Westside Corridor. With the extension the Purple Line subway service to the Westwood/VA Hospital Station, it is estimated that one-third of demand would involve local bus access. Metro continues to seek to improve the region's transit needs and continually evaluates various transit corridors to achieve a more interconnected transportation system. To help guide design of subway stations, potential enhanced local bus service at stations was assessed and is discussed in Chapter 3 of the Final EIS/EIR.

The Project will be funded primarily through a combination of Measure R local funds and Federal New Starts funds, with some other local, State, and Federal funds. Metro will continue to use a combination of local, State, and Federal funding sources to operate and maintain the system. In addition to these funding sources, Metro relies on fare revenues to fund about one-third of its operating costs. Bus operating funds will not be used to construct the Project, and no fare increases or service reductions are proposed to cover the Project's costs. The selection of the TSM Alternative would not have resulted in lower fares. The Metro Board of Directors establishes fares. Currently, the Base Fare for each boarding is $1.50 and the Metro Day Pass is $5.00. A transfer is the same as the Base Fare - $1.50.

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Appendix H - Response to Comments

138-1

Your comment in support of the Westside Subway Extension Project has been noted. On October 28, 2010, the Metro Board of Directors identified Alternative 2 (Westwood/VA Hospital Extension) as the Locally Preferred Alternative. Only Alternatives 1 and 2 are affordable within the adopted Long Range Transportation Plan, and between them, Alternative 2 provides higher ridership and improved cost effectiveness. Additionally, Alternative 2 serves the VA Hospital and other communities west of the I-405 more effectively.

Please refer to Sections 2.3, 2.4, and 2.5 of the Final EIS/EIR for an overview of the development of alternatives and the LPA selection process.

138-2

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 comments about parking have been noted. Park-and-ride can be an important mode of access to transit. However, these facilities are usually located in low-density areas that lack local bus service feeding the stations. That is not the case with this Project. Therefore, none of the stations proposed as part of the Project will provide parking.

The provision of park-and-ride facilities would be inconsistent with the purpose and need of the Project. The Project Study Area is already very congested and Metro seeks to discourage people from driving to access the subway. Park-and-ride facilities also could lead to increased auto use and potentially result in traffic impacts at intersections.

The provision of park-and-ride facilities also would be inconsistent with both the existing built environment surrounding stations and efforts to encourage transit-oriented development. The Project corridor is very dense due to medium and high density commercial and residential development. The construction of park-and-ride facilities would consume space that could be put to more productive residential and commercial uses.

Any added park-and-ride facilities would have major implications on Project costs. The study area also has very high land costs and there is lack of available parcels for park-and-ride development. Due to land costs and scarcity, any parking would need to be in multi-story garages, resulting in substantially higher capital costs than current estimates.

Please refer to Section 8.8.8 of the Final EIS/EIR for more detailed responses to concerns related to parking. In addition, Section 3.6 of the Final EIS/EIR estimates the demand for parking at the stations and provides an analysis of potential spillover parking impacts to surrounding communities.
Your preference for the TSM Alternative has been noted. On October 28, 2010, the Metro Board of Directors identified Alternative 2 (Westwood/VA Hospital Extension) as the Locally Preferred Alternative (LPA). Alternative 2 was selected as the LPA because the analysis in the Draft EIS/EIR demonstrated that the Build Alternatives would be more effective than the TSM Alternative in terms of enhancing mobility, serving development opportunities, and addressing other aspects of the Purpose and Need for the Project. Please refer to Chapter 7 of the Draft EIS/EIR and Section 2.5 of the Final EIS/EIR for information on this analysis.

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To Whom it may concern,

My name is Gregory Chazanas, I am an Architect and a resident of Beverly Hills. I was present at the last two presentations of the Westside Subway Extension. I would like to voice my strong concern about the new route that will go under the residences and the Beverly Hills High School and the Good Samaritan School. My house would be affected by this new underground tunneling. My house is very contemporary and has a lot of large glass windows that will break in the case of even a minor settlement. Therefore, I believe that your original route on Wilshire and Little Santa Monica is superior. This is not just because of how it affects my property, but also, Santa Monica Blvd. has the pre-existing right of way with the abandoned rails. In addition, there is a lack of construction over the street and the depth necessary for digging is much less (10 feet versus 100 feet), so the station does not need to be as deep. All of these benefits make this project much more economical and more in tune with the residents of entire area.

Thank you for your consideration.

You can contact me at:

Gregory Chazanas
Architect & Planners
213 S. Linden Drive
Beverly Hills, CA 90212
310.925.1791
goyochazanas@gmail.com

On Oct 11, 2010, at 9:51 AM, Westside Subway Extension wrote:

PDA/HANDHELD DEVICES - TO VIEW WITH GRAPHICS CLICK HERE

Westside Subway Extension

Subway Comment Deadline Approaching

We want to hear from you! Metro is currently accepting official comments on the Draft EIS/EIR for the Westside Subway Extension. The public comment period concludes in one week: October 18, 2010.

You may submit your comments by:
- Email: westsideextension@metro.net
- U.S. Mail: David Mieger, Project Manager, One Gateway Plaza, Mail Stop 99-22-2, Los Angeles, CA 90012
- Visiting our website metro.net/westside and clicking on “contact us”

We cannot include Facebook comments as a part of the official record during this period.

411-1

Your comment in support of the Century City Santa Monica Station location and concerns about tunneling beneath homes and schools as well as the development of the Century City station and alignment options has been noted.

Metro followed FTA’s New Starts project planning and development process and carefully considered public input in developing the location of the Century City Station. The process of determining the location of the Century City Station began with the Westside Transit Corridor Alternatives Analysis Study in 2007. At the beginning of the Alternatives Analysis (AA) Study, two general corridors—one along Wilshire Boulevard and the other along Santa Monica Boulevard—were presented to the public at Early Scoping meetings. Some people who spoke at the Early Scoping meetings generally supported the proposed station locations that were presented (Santa Monica Boulevard in Century City being one of them). However, some attendees also suggested additional or alternate station locations, with some commenting that the station in Century City should be south of Santa Monica Boulevard, closer to the center of Century City, which Metro took into consideration.

During scoping for the Draft EIS/EIR in 2009, Metro sought additional public comment on the alignment and station options in the Beverly Hills to Westwood area, including the Century City Station location. During preparation of the Draft EIS/EIR, the alignment and station locations were refined to avoid impacts to the natural and built environments where feasible, provide a cost-effective solution to increase east/west mobility in the Study Area, and respond to public and agency input. The analysis and refinement of the station and alignment locations, including the Century City Station location, are described in the Westside Subway Extension Alternatives Screening and Refinement Following Scoping Report. Ultimately, the Century City Santa Monica Station and the Century City Constellation Station were carried forward for analysis in the Draft EIS/EIR.

Following public circulation of the Draft EIS/EIR, on October 28, 2010, the Metro Board of Directors identified Alternative 2 (Westwood/VA Hospital Extension) as the Locally Preferred Alternative (LPA). As part of the LPA selection, the Metro Board of Directors decided to continue to study both station location options in Century City (Santa Monica Boulevard and Constellation Boulevard) to address concerns raised by the community regarding locating a station directly on a seismic fault and the safety of tunneling under homes and schools. The Metro Board of Directors also decided to not include the Constellation South alignment between the Wilshire/Rodeo and Century City Stations as part of the LPA, but to continue to study the Constellation North and the Santa Monica Boulevard alignments. The Constellation South alignment passed beneath more residential properties than the Constellation North or Santa Monica Boulevard alignments. In addition, the Metro Board of Directors decided to not include the West or Central alignments between Century City and Westwood/UCLA as part of the LPA, but to continue to study the East alignment because the East alignment is the most direct and least expensive route between the two stations.
Metro will respond to all comments received during the Final EIS/EIR phase of the project.

If you missed the public hearings, Metro has posted the presentation online, which you may view here. Archives of the live webcasts of two of the public hearings are available here. The Draft EIS/EIR and supporting technical reports are posted on Metro’s website here.

Again, public comments on the Draft EIS/EIR will be accepted through October 18, 2010.

The Metro Board of Directors is scheduled to consider the Draft EIS/EIR at its regularly scheduled meeting at 9:30 am on October 28, 2010. We will provide you with more information about that meeting as soon as it is available.

For more information about the Metro Westside Subway Extension, go to metro.net/westside.

Find us on Facebook: Facebook.com/WestsideSubwayExtension
Follow us on Twitter: Twitter.com/WestsideSubway

Safety, both during construction and eventual operations, is one of Metro’s highest priorities and is one of the key evaluation criteria in selection of the Locally Preferred Alternative (LPA). In response to the Metro Board of Director’s request for more information, further analysis was undertaken to focus on the engineering and environmental aspects of the two options during the preparation of the Final EIS/EIR to expand on the studies conducted in preparation of the Draft EIS/EIR. It should be noted that prior to conducting the comparative study, the Santa Monica Boulevard Station location was shifted slightly to the east from the location in the Draft EIS/EIR to avoid the Santa Monica Fault zone.

On most transit tunnel projects, significant portions of the alignment are constructed adjacent to or beneath buildings. The LPA passes beneath homes and schools in these neighborhoods because the curve radius required for subway tunnels is much wider than that required at a typical surface street intersection. The current alignment minimizes tunneling under buildings to the east and west of both the Century City Stations. The station position on Constellation Boulevard requires the tunnel alignment to be under the south portion of Beverly Hills High School Building B in order to reach the station location. There is no reasonable tunnel alignment that does not pass under homes or structures within the Beverly Hills High School campus.

The geotechnical studies conducted during preparation of the Final EIS/EIR concluded that tunneling can be safely carried out beneath the Beverly Hills High School campus and the West Beverly Hills, Century City, and Westwood neighborhoods. The use of state-of-the-art pressurized closed-face TBMs for soft-ground tunneling has greatly improved the control of ground movements such that tunneling can be done with minimal surface settlements. The presence of the tunnels will neither affect the risk to buildings above them during an earthquake nor change the severity of shaking. Finally, tunnels can be constructed and operated safely in gassy grounds and oil wells do not pose an unmitigatable risk to tunneling.

The additional detailed geotechnical studies also assessed soil conditions and determine the potential for noise or vibration impacts on the surface along the refined alignments. These studies concluded that the predicted vibration and noise levels are within the FTA requirements and operation of the subway is not anticipated to have adverse impacts with the implementation of mitigation, including areas where the tunnels pass beneath homes and schools. During construction, low levels of noise and vibration may be experienced for a day or two as each of the two TBMs pass under a given location. In addition, as the tunnels are driven, construction trains bring supplies to and from the tunnel heading. However, these underground construction noises will also be controlled to be within Metro criteria.

The Westside Subway Extension will not reduce the availability of BHHS for use as an
emergency shelter or impact the operations of its use as an emergency shelter. Furthermore, tunneling would not prevent future development of the BHHS campus. The vertical alignment of the tunnel would be 55 to 70 feet below the ground surface (to the top of the tunnel), which would allow for construction of an underground structure over the tunnel at a later date.

These geotechnical studies also determined that the Century City Santa Monica Station would cross the West Beverly Hills Lineament, a northern extension of the active Newport-Inglewood Fault, which poses a significant safety risk to passengers at this station location. No evidence of faulting was found at the proposed Century City Constellation Station site. Tunnels to the east and west of Century City pass through at least two active faults. However, there are numerous tools, designs, and construction means and methods that have been used elsewhere that can be used to safely tunnel through these fault zones.

In addition, the Century City Constellation Boulevard Station has the best pedestrian environment, can be expected to attract the most transit riders, and is centrally located to help shape the redevelopment of Century City as an important transit-oriented destination on the Westside Subway Extension. Further refinements to the ridership analysis concluded that the Century City Constellation Station would result in 3,350 more boardings along new Westside Subway Extension stations than the Century City Santa Monica Station due to proximity to jobs and residences within the critical 600-foot and 1/4-mile walksheds.

Based on all of these factors, the Century City Station Location Report concluded by recommending that the Century City Station be located along Constellation Boulevard due to seismic safety concerns at the Santa Monica Boulevard Station and higher ridership projections with Constellation Boulevard Station.

Please refer to Section 8.8.2 and 8.8.3 of the Final EIS/EIR for more detailed responses to concerns related to the Century City Station and alignments and Section 8.8.4 of the Final EIS/EIR for a more detailed response to geotechnical concerns. Refer to Section 7.3 of the Final EIS/EIR and the Westside Subway Extension Century City Station Location Report for a comparison of the two Century City Station locations. The results of further geotechnical investigations in the Century City vicinity can be found in the Westside Subway Extension Century City Area Fault Investigation Report and the Westside Subway Extension Century City Area Tunneling Safety Report. The results of further ridership studies can be found in the Westside Subway Extension Technical Report Summarizing the Results of the Forecasted Alternatives and the Westside Subway Extension Century City TOD and Walk Access Study. All reports are available on the Metro Westside Subway Extension Project website: www.metro.net/projects/westside/westside-reports.
573-1
Your support for Alternative 5 (Santa Monica Extension plus West Hollywood Extension) has been noted. On October 28, 2010, the Metro Board of Directors identified Alternative 2 (Westwood/VA Hospital Extension) as the Locally Preferred Alternative (LPA). Only Alternatives 1 and 2 are affordable within the adopted Long Range Transportation Plan (LRTP), and between them, Alternative 2 provides significantly higher ridership and better cost effectiveness. Additionally, Alternative 2 serves the VA Hospital and other communities west of the I-405 more effectively.

The Draft EIS/EIR demonstrated a significant market for a subway serving Santa Monica and West Hollywood. However, there is not sufficient Measure R or other funding available to construct a Santa Monica or West Hollywood subway at this time. The Santa Monica and West Hollywood corridors are included in the Strategic Element of the 2009 Long Range Transportation Plan. Further study could occur should funding be identified and secured in the future. If the LPA is approved for implementation by the Metro Board, the LPA will also be designed so as not to preclude future westward extension of the subway.

Please refer to Sections 2.3, 2.4, and 2.5 of the Final EIS/EIR for an overview of the development of alternatives and the LPA selection process.

Hi,

I am writing to express how much I am in favor of the Westside Extension Alternative #5, which passes through the City of West Hollywood and Santa Monica.

It just makes a huge amount of sense.

I’ve looked at your population map overlays, and one GLARING thing I notice is that in the projections West Hollywood, while not as densely populated as Westwood or Hollywood, is fairly dense and getting more populated, and it is the only more Densely Populated Area NEITHER SERVED BY RAIL NOR HIGHWAY of the Westside cities!!!! This is ridiculous especially when you consider the cultural and economic impact of a city like Weho.

West Hollywood has a very vibrant nightlife, perhaps more so than anywhere else in the LA area. Building a subway through Weho also would help get drunk drivers off the roads and make LA a safer place for everyone.

Yes, the #5 alternative is expensive, but costs are not going to go down. It makes sense to build the subway now before both costs and population density goes up. Weho is planning on developing even higher density projects, especially near La Brea and Santa Monica. Two huge projects have just been approved for that intersection, adding to traffic already drawn to Weho Gateway and its Target and Best Buy stores. And the Cedar Sinai/Beverly Center is a huge magnet for both workers and people looking to shop/seek medical care.

Also, West Hollywood residents turned out in huge numbers to support Measure R, the very measure that is funding so much of this expansion.

Thanks so much for taking into account my comments and concerns.

Best wishes,

Mike
Dear Metro

I'm unable to attend the Westside extension meeting in person. However, I wanted to submit my comments for the record. I'm full support of the subway extension and in particular, Alternative 5 with both Wilshire and Santa Monica Blvd. service.

I work in Century City and I strongly prefer the Century City station to be placed under Constellation Blvd.

My preference for the section under EIR are as follows:

- No Crenshaw Station
- East Fairfax Station
- La Cienega Station that will enable connection with future Santa Monica Blvd line
- Westwood - NO PREFERENCE - either on street or under UCLA parking lot is fine. go with the cheapest option
- VA South Station
- Shortest distance/most direct route between all stations

Thank you

Irwin Chen
2121 Avenue of The Stars
Suite 1758
Los Angeles, CA 90067

38-1

Your support for Alternative 5 (Santa Monica Extension plus West Hollywood Extension) has been noted. On October 28, 2010, the Metro Board of Directors identified Alternative 2 (Westwood/VA Hospital Extension) as the Locally Preferred Alternative (LPA). Only Alternatives 1 and 2 are affordable within the adopted Long Range Transportation Plan (LRTP), and between them, Alternative 2 provides significantly higher ridership and better cost effectiveness. Additionally, Alternative 2 serves the VA Hospital and other communities west of the I-405 more effectively.

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Please refer to Sections 2.3, 2.4, and 2.5 of the Final EIS/EIR for an overview of the development of alternatives and the LPA selection process.

38-2

Your comment on the Wilshire/Crenshaw Station has been noted. In October 2010, the Metro Board of Directors identified Alternative 2 (Westwood/VA Extension) as the Locally Preferred Alternative (LPA). A Wilshire/Crenshaw Station was not included in the LPA.

The Wilshire/Crenshaw Station would be located in the Park Mile section of Wilshire Boulevard, adjacent to lower density land uses that are not planned for future growth in the adopted Community Plan and Park Mile Specific Plan. This site is only 0.5 mile from the existing Wilshire/Western Station and does not serve a major north south intersection, as Crenshaw Boulevard terminates at Wilshire Boulevard and does not extend to the north. Because this is a comparatively lower ridership station with a cost of $153 million, eliminating this station from the LPA improves the cost-effectiveness of Alternative 2. Furthermore, future connections from the Westside subway stations along Wilshire Boulevard to the planned Crenshaw/LAX Light Rail Transit project to the south have been recommended to take place at La Brea, La Cienega, or San Vicente rather than at Wilshire/Crenshaw.

Please refer to Sections 2.3, 2.4, and 2.5 of the Final EIS/EIR for an overview of the development of alternatives, including station locations, and the LPA selection process. The Westside Subway Extension Alternatives Screening and Refinement Following Scoping Report provides a more detailed description of the refinements to the Wilshire/Crenshaw Station following Draft EIS/EIR scoping in response to community comments and engineering requirements. This report is available on the Metro Westside

Appendix H - Response to Comments
Your comment supporting the East location for the Wilshire/Fairfax Station has been noted. On October 28, 2010, the Metro Board of Directors identified Alternative 2 (Westwood/VA Hospital Extension) as the Locally Preferred Alternative, which includes the Wilshire/Fairfax East Station location due to stronger community support and better access and land integration opportunities, including proximity to Museum Row.

Please refer to Sections 2.3, 2.4, and 2.5 of the Final EIS/EIR for an overview of the development of alternatives, including station locations, and the LPA selection process. The Westside Subway Extension Alternatives Screening and Refinement Following Scoping Report provides a more detailed description of the refinements to the Wilshire/Fairfax Station following Draft EIS/EIR scoping in response to community comments and engineering requirements. This report is available on the Metro Westside Subway Extension Project website: www.metro.net/projects/westside/westside-reports.

Your preference for the inclusion of the West Hollywood connection structure has been noted. On October 28, 2010, the Metro Board of Directors identified Alternative 2 (Westwood/VA Hospital Extension) as the Locally Preferred Alternative (LPA). The Board chose not to include a West Hollywood connection structure in the LPA due to funding constraints.

Additionally, the cost of the connection structure is not sufficiently justified when there may be alternative, less costly solutions to serve the West Hollywood transit market, such as a light rail line. The Draft EIS/EIR showed that there is a market for transit improvements serving West Hollywood, and this corridor is included in the Strategic Element of the 2009 Long Range Transportation Plan. Should funding be identified and secured, further study could be done to identify a project that would be competitive under Federal funding criteria.

Please refer to Sections 2.3, 2.4, and 2.5 of the Final EIS/EIR for an overview of the development of alternatives, including station locations, and the LPA selection process. The Westside Subway Extension Alternatives Screening and Refinement Following Scoping Report provides a more detailed description of the refinements to the Wilshire/La Cienega Station, including the potential connection structure, following Draft EIS/EIR scoping in response to community comments and engineering requirements. This report is available on the Metro Westside Subway Extension Project website: www.metro.net/projects/westside/westside-reports.
Your comment in support of the Century City Constellation Station has been noted. On October 28, 2010, the Metro Board of Directors identified Alternative 2 (Westwood/VA Hospital Extension) as the Locally Preferred Alternative (LPA). As part of the LPA selection, the Metro Board of Directors decided to continue to study both station location options in Century City (Santa Monica Boulevard and Constellation Boulevard) to address concerns raised by the community regarding locating a station directly on a seismic fault and the safety of tunneling under homes and schools.

In response to the Metro Board of Director’s request for more information, further analysis was undertaken to focus on the engineering and environmental aspects of the two options during the preparation of the Final EIS/EIR to expand on the studies conducted in preparation of the Draft EIS/EIR. It should be noted that prior to conducting the comparative study, the Santa Monica Boulevard Station location was shifted slightly to the east from the location in the Draft EIS/EIR to avoid the Santa Monica Fault zone.

The geotechnical studies conducted during preparation of the Final EIS/EIR concluded that tunneling can be safely carried out beneath the Beverly Hills High School campus and the West Beverly Hills, Century City, and Westwood neighborhoods. However, these studies also determined that the Century City Santa Monica Station would cross the West Beverly Hills Lineament, a northern extension of the active Newport-Inglewood Fault, which poses a significant safety risk to passengers at this station location. No evidence of faulting was found at the proposed Century City Constellation Station site.

In addition, the Century City Constellation Boulevard Station has the best pedestrian environment, can be expected to attract the most transit riders, and is centrally located to help shape the redevelopment of Century City as an important transit-oriented destination on the Westside Subway Extension. Further refinements to the ridership analysis concluded that the Century City Constellation Station would result in 3,350 more boardings along new Westside Subway Extension stations than the Century City Santa Monica Station due to proximity to jobs and residences within the critical 600-foot and 1/4-mile walksheds.

Based on all of these factors, the Century City Station Location Report concluded by recommending that the Century City Station be located along Constellation Boulevard due to seismic safety concerns at the Santa Monica Boulevard Station and higher ridership projections with Constellation Boulevard Station.

Please refer to Section 8.8.2 and 8.8.3 of the Final EIS/EIR for more detailed responses to concerns related to the Century City Station. Refer to Section 7.3 of the Final EIS/EIR and the Westside Subway Extension Century City Station Location Report for a comparison of the two Century City Station locations. The results of further geotechnical investigations in the Century City vicinity can be found in the Westside Subway Extension Century City Area Appendix H - Response to Comments
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Fault Investigation Report and the Westside Subway Extension Century City Area Tunneling Safety Report. The results of further ridership studies can be found in the Westside Subway Extension Technical Report Summarizing the Results of the Forecasted Alternatives and the Westside Subway Extension Century City TOD and Walk Access Study. All reports are available on the Metro Westside Subway Extension Project website: www.metro.net/projects/westside/westside-reports.

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Your preference for either location of the Westwood/ UCLA Station has been noted. On October 28, 2010, the Metro Board of Directors identified Alternative 2 (Westwood/VA Hospital Extension) as the Locally Preferred Alternative (LPA). As part of the LPA selection, the Metro Board decided to continue to study both Westwood/UCLA station location options (On-Street and Off-Street).

A comparative study of the two proposed Westwood/UCLA station locations, including engineering, costs, urban design, and environmental impact considerations, was conducted during the Final EIS/EIR phase to expand on the studies conducted in preparation of the Draft EIS/EIR.

The Off-Street Station and tunnels would need to be deeper than the On-Street Station to clear the underside of foundations for a future hotel on Gayley Avenue, which makes the station and tunnels riskier and more expensive to construct, and requires more time for transit riders to travel between the platform and the station entrance. Additionally, the Westwood/UCLA Off-Street Station location would require approximately 13 additional permanent underground easements.

The On-Street Station location would provide at least one of entrance at the corner of Wilshire and Westwood Boulevards. This entrance location would provide better access to bus connections along Westwood Boulevard and would be closer to the major office buildings and Westwood Village than the entrances for the Off-Street Station. Furthermore, one of the station entrance options for the On-Street Station is a split entrance between the north and south sides of Wilshire Boulevard, providing access to both sides of busy Wilshire Boulevard. However, the Westwood/UCLA On-Street Station option is also expected to have greater traffic impacts during construction due to in-street construction along Wilshire Boulevard.

Based on these factors, the recommendation is to locate the Westwood/UCLA Station On-Street as this location could accommodate an entrance at the Wilshire Boulevard and Westwood Boulevard intersection, providing better pedestrian access to Westwood Village and connections along Westwood Boulevard.

Please refer to Section 8.8.6 of the Final EIS/EIR for more detailed responses to concerns
related to the Westwood/UCLA Station. Please refer to Sections 2.3, 2.4, and 2.5 of the Final EIS/EIR for an overview of the development of alternatives, including station locations, and the LPA selection process. The *Westside Subway Extension Alternatives Screening and Refinement Following Scoping Report* provides a more detailed description of the refinements to the Westwood/UCLA Station following Draft EIS/EIR scoping in response to community comments and engineering requirements. Refer to Section 7.3 of the Final EIS/EIR and the *Westside Subway Extension Westwood/UCLA Station and Westwood/VA Hospital Station Locations Report* for a comparison of the two Westwood/UCLA locations. In addition, the *Westside Subway Extension Station Entrance Location Report and Recommendations* provides a comparison of the potential entrance locations at Westwood Boulevard, Gayley Avenue and Veteran Avenue for both the On-Street and Off-Street Stations. All reports are available on the Metro Westside Subway Extension Project website: www.metro.net/projects/westside/westside-reports.

Your preference for the South location of the Westwood/VA Hospital Station has been noted. On October 28, 2010, the Metro Board of Directors identified Alternative 2 (Westwood/VA Hospital Extension) as the Locally Preferred Alternative (LPA). As part of the LPA selection, the Metro Board decided to continue to study both Westwood/VA Hospital station location options (South and North).

A comparative study of the two proposed Westwood/VA Hospital station locations, including engineering, costs, urban design, and environmental impact considerations, was conducted during the Final EIS/EIR to expand on the studies conducted in preparation of the Draft EIS/EIR.

While both options are within one-quarter mile of the VA Hospital, the Westwood/VA Hospital South Station site is 500 feet from the hospital and on the same side of Wilshire Boulevard, while the Westwood/VA Hospital North Station site is 1,200 feet away on the other side of Wilshire Boulevard. Additionally, the North Option could be problematic in the event of a future extension to Santa Monica due to the tight radius curve that would be required to extend west beneath residential properties. However, the construction of the South Option would result in more impacts to traffic circulation during construction, including temporary ramp closures at the I-405 interchange.

Based on these factors, the recommendation is to locate the Westwood/VA Hospital Station on the south side of Wilshire Boulevard as this location would provide better pedestrian access to the VA Medical Center and would more easily accommodate a future westward extension of the subway.

Please refer to Section 8.8.5 of the Final EIS/EIR for more detailed responses to concerns.
related to the Westwood/VA Hospital Station and to Sections 2.3, 2.4, and 2.5 of the Final EIS/EIR for an overview of the development of alternatives, including station locations, and the LPA selection process. The Westside Subway Extension Alternatives Screening and Refinement Following Scoping Report provides a more detailed description of the refinements to the Westwood/VA Hospital Station following Draft EIS/EIR scoping in response to community comments and engineering requirements. 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 Station locations. All reports are available on the Metro Westside Subway Extension Project website: www.metro.net/projects/westside/westside-reports.

Your comment about selecting the most direct and least expensive route that generates the highest ridership has been noted. Ridership is indeed one of several important factors that Metro considers in its recommendations to the Board. In selecting a route, Metro considers several factors, including ridership, user benefits, travel time, capital costs, performance characteristics, and environmental impacts. Generally, the least expensive, most direct, and highest ridership route is the preferred route, but a combination or balancing of the factors identified above are used in making a selection. Between Beverly Hills and Century City, two route options - Santa Monica and Constellation North - were carried forward for further analysis in the Final EIS/EIR as part of the Locally Preferred Alternative (LPA). These route options reflect the two station location options remaining in Century City. In the case of the route options between Century City and Westwood, the East Alignment was selected as part of the LPA, as it is shorter and less costly than the West Alignment and has fewer environmental impacts than the Central Alignment.

Please refer to Sections 2.3, 2.4, and 2.5 of the Final EIS/EIR for an overview of the development of alternatives, including alignment locations, and the LPA selection process. The Westside Subway Extension Alternatives Screening and Refinement Following Scoping Report provides a more detailed description of the refinements to the alignments in the Century City vicinity following Draft EIS/EIR scoping in response to community comments and engineering requirements. This report is available on the Metro Westside Subway Extension Project website: www.metro.net/projects/westside/westside-reports.
Your comment on the Wilshire/Crenshaw Station has been noted. In October 2010, the Metro Board of Directors identified Alternative 2 (Westwood/VA Extension) as the Locally Preferred Alternative (LPA). A Wilshire/Crenshaw Station was not included in the LPA.

The Wilshire/Crenshaw Station would be located in the Park Mile section of Wilshire Boulevard, adjacent to lower density land uses that are not planned for future growth in the adopted Community Plan and Park Mile Specific Plan. This site is only 0.5 mile from the existing Wilshire/Western Station and does not serve a major north south intersection, as Crenshaw Boulevard terminates at Wilshire Boulevard and does not extend to the north. Because this is a comparatively lower ridership station with a cost of $153 million, eliminating this station from the LPA improves the cost-effectiveness of Alternative 2. Furthermore, future connections from the Westside subway stations along Wilshire Boulevard to the planned Crenshaw/LAX Light Rail Transit project to the south have been recommended to take place at La Brea, La Cienega, or San Vicente rather than at Wilshire/Crenshaw.

Please refer to Sections 2.3, 2.4, and 2.5 of the Final EIS/EIR for an overview of the development of alternatives, including station locations, and the LPA selection process. The Westside Subway Extension Alternatives Screening and Refinement Following Scoping Report provides a more detailed description of the refinements to the Wilshire/Crenshaw Station following Draft EIS/EIR scoping in response to community comments and engineering requirements. This report is available on the Metro Westside Subway Extension Project website: www.metro.net/projects/westside/westside-reports.

Your preference for a modified Westwood/VA Hospital Station location has been noted.

During the Draft EIS/EIR scoping, the public suggested that an additional station should be provided west of I-405 because of the large distance between a Westwood/UCLA and a Wilshire/Bundy Station, as well as a desire to serve communities west of the I-405 more effectively. In response, five proposed stations west of I-405 were studied—two at Westwood/VA Hospital (one north of Wilshire and one south of Wilshire), Wilshire/Federal, Wilshire/Barrington, and Wilshire/Bundy. In analyzing the proposed stations, the potential to serve as a terminus station was an important consideration. In addition, all of the stations except for the stations at Westwood/VA Hospital are located too far west to be funded as part of Measure R and beyond the adopted LRTP.

The Wilshire/Federal Station would have been located on a site currently used by the U.S. Army Reserve, and the site was determined to be too small to accommodate the subway station without impacting adjacent historic homes in the VA property. From an engineering perspective, this also would have been a challenging site to construct a subway station because of the sharp curve of Wilshire Boulevard. Therefore, the Wilshire/Federal Station would...
was eliminated from further consideration.

The Wilshire/Barrington Station would be located slightly west of the proposed Wilshire/Federal Station. While the Wilshire/Barrington Station is in a high density area with high ridership potential, comments were received from the community during scoping in opposition to locating a terminus station at Wilshire/Barrington due to traffic congestion and dense development concerns. Furthermore, the Wilshire/Barrington Station was not as evenly spaced between the Westwood/UCLA Station and the Wilshire/Bundy Station as is the Westwood/VA Hospital Station.

The Wilshire/Bundy Station is the farthest west of the terminus station considered and provided better potential transit connections as it aligns with the future planned Expo station at Olympic/Bundy. However, it is beyond Measure R funding.

Based on all of these considerations, and especially the fact that only the Westwood/VA Hospital Station is fundable within Measure R, the Wilshire/Federal, Wilshire/Barrington, and Wilshire/Bundy Stations were eliminated as potential terminus stations for the fundable Measure R alternatives. Both the North and South Options at the Westwood/VA Hospital Station were carried forward for further analysis in the Draft EIS/EIR. The Wilshire/Bundy Station was also carried forward into the Draft EIS/EIR as part of the Santa Monica Extension, which is beyond available Measure R funding, and would not serve as a terminus station.

Please refer to Section 8.8.5 of the Final EIS/EIR for more detailed responses to concerns related to the Westwood/VA Hospital Station and to Sections 2.3, 2.4, and 2.5 of the Final EIS/EIR for an overview of the development of alternatives, including station locations, and the LPA selection process. The Westside Subway Extension Alternatives Screening and Refinement Following Scoping Report provides a more detailed description of the refinements to the Westwood/VA Hospital Station following Draft EIS/EIR scoping in response to community comments and engineering requirements. 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 Station locations in the Final EIS/EIR. All reports are available on the Metro Westside Subway Extension Project website: www.metro.net/projects/westside/westside-reports.

Metro is currently pursuing federal funding for the entire length of the LPA and therefore it is not anticipated that it would be terminated before it's completed. If federal funding is made available for the Westside Extension Transit project, it is Metro's intent to build the entire extension at the same time.
Dear Metro,

I'm a resident of Beverly Hills and have 2 children in this school district. I'm emailing to let you know that I support the "Santa Monica" option only. Please do not tunnel under Beverly Hills High School. Besides posing an unknown environmental danger to the high school students, this will certainly interfere with the future construction at the high school to improve the quality of education. Our country is in need of high quality education and to cripple any school of that when there is a perfectly better alternative is just not human. Please use the "Santa Monica" option.

Sincerely,

Orachat Chieu

Your comment in support of the Century City Santa Monica Station and concerns about tunneling beneath homes and schools has been noted. On October 28, 2010, the Metro Board of Directors identified Alternative 2 (Westwood/VA Hospital Extension) as the Locally Preferred Alternative (LPA). As part of the LPA selection, the Metro Board of Directors decided to continue to study both station location options in Century City (Santa Monica Boulevard and Constellation Boulevard) to address concerns raised by the community regarding locating a station directly on a seismic fault and the safety of tunneling under homes and schools. The Metro Board of Directors also decided to not include the Constellation South alignment between the Wilshire/Rodeo and Century City Stations as part of the LPA, but to continue to study the Constellation North and the Santa Monica Boulevard alignments. The Constellation South alignment passed beneath more residential properties than the Constellation North or Santa Monica Boulevard alignments. In addition, the Metro Board of Directors decided to not include the West or Central alignments between Century City and Westwood/UCLA as part of the LPA, but to continue to study the East alignment because the East alignment is the most direct and least expensive route between the two stations.

Safety, both during construction and eventual operations, is one of Metro's highest priorities and is one of the key evaluation criteria in selection of the Locally Preferred Alternative (LPA). In response to the Metro Board of Director's request for more information, further analysis was undertaken to focus on the engineering and environmental aspects of the two options during the preparation of the Final EIS/EIR to expand on the studies conducted in preparation of the Draft EIS/EIR. It should be noted that prior to conducting the comparative study, the Santa Monica Boulevard Station location was shifted slightly to the east from the location in the Draft EIS/EIR to avoid the Santa Monica Fault zone.

On most transit tunnel projects, significant portions of the alignment are constructed adjacent to or beneath buildings. The LPA passes beneath homes and schools in these neighborhoods because the curve radius required for subway tunnels is much wider than that required at a typical surface street intersection. The current alignment minimizes tunneling under buildings to the east and west of both the Century City Stations. The station position on Constellation Boulevard requires the tunnel alignment to be under the south portion of Beverly Hills High School Building B in order to reach the station location. There is no reasonable tunnel alignment that does not pass under homes or structures within the Beverly Hills High School campus.

The geotechnical studies conducted during preparation of the Final EIS/EIR concluded that tunneling can be safely carried out beneath the Beverly Hills High School campus and the West Beverly Hills, Century City, and Westwood neighborhoods. The use of state-of-the-art pressurized closed-face TBMs for soft-ground tunneling has greatly improved the control of ground movements such that tunneling can be done with minimal surface settlements. The presence of the tunnels will neither affect the risk to buildings above them during an
earthquake nor change the severity of shaking. Finally, tunnels can be constructed and
operated safely in gassy grounds and oil wells do not pose an unmitigatable risk to
tunneling.

The additional detailed geotechnical studies also assessed soil conditions and determine
the potential for noise or vibration impacts on the surface along the refined alignments.
These studies concluded that the predicted vibration and noise levels are within the FTA
requirements and operation of the subway is not anticipated to have adverse impacts with
the implementation of mitigation, including areas where the tunnels pass beneath homes
and schools. During construction, low levels of noise and vibration may be experienced for
a day or two as each of the two TBMs pass under a given location. In addition, as the
tunnels are driven, construction trains bring supplies to and from the tunnel heading.
However, these underground construction noises will also be controlled to be within Metro
criteria.

The Westside Subway Extension will not reduce the availability of BHHS for use as an
emergency shelter or impact the operations of its use as an emergency shelter.
Furthermore, tunneling would not prevent future development of the BHHS campus. The
vertical alignment of the tunnel would be 55 to 70 feet below the ground surface (to the top
of the tunnel), which would allow for construction of an underground structure over the
tunnel at a later date.

These geotechnical studies also determined that the Century City Santa Monica Station
would cross the West Beverly Hills Lineament, a northern extension of the active Newport-
Inglewood Fault, which poses a significant safety risk to passengers at this station location.
No evidence of faulting was found at the proposed Century City Constellation Station site.
Tunnels to the east and west of Century City pass through at least two active faults.
However, there are numerous tools, designs, and construction means and methods that
have been used elsewhere that can be used to safely tunnel through these fault zones.

In addition, the Century City Constellation Boulevard Station has the best pedestrian
environment, can be expected to attract the most transit riders, and is centrally located to
help shape the redevelopment of Century City as an important transit-oriented destination
on the Westside Subway Extension. Further refinements to the ridership analysis
concluded that the Century City Constellation Station would result in 3,350 more boardings
along new Westside Subway Extension stations than the Century City Santa Monica
Station due to proximity to jobs and residences within the critical 600-foot and 1/4-mile
walksheds.

Based on all of these factors, the Century City Station Location Report concluded by
recommending that the Century City Station be located along Constellation Boulevard due
to seismic safety concerns at the Santa Monica Boulevard Station and higher ridership
projections with Constellation Boulevard Station.

Please refer to Section 8.8.2 and 8.8.3 of the Final EIS/EIR for more detailed responses to concerns related to the Century City Station and alignments and Section 8.8.4 of the Final EIS/EIR for a more detailed response to geotechnical concerns. Refer to Section 7.3 of the Final EIS/EIR and the Westside Subway Extension Century City Station Location Report for a comparison of the two Century City Station locations. The results of further geotechnical investigations in the Century City vicinity can be found in the Westside Subway Extension Century City Area Fault Investigation Report and the Westside Subway Extension Century City Area Tunneling Safety Report. The results of further ridership studies can be found in the Westside Subway Extension Technical Report Summarizing the Results of the Forecastsed Alternatives and the Westside Subway Extension Century City TOD and Walk Access Study. All reports are available on the Metro Westside Subway Extension Project website: www.metro.net/projects/westside/westside-reports.
Your preference for the TSM Alternative has been noted. On October 28, 2010, the Metro Board of Directors identified Alternative 2 (Westwood/VA Hospital Extension) as the Locally Preferred Alternative (LPA). Alternative 2 was selected as the LPA because in the Draft EIS/EIR demonstrated that the Build Alternatives would be more effective than the TSM Alternative in terms of enhancing mobility, serving development opportunities, and addressing other aspects of the Purpose and Need for the Project. Please refer to Chapter 7 of the Draft EIS/EIR and Section 2.5 of the Final EIS/EIR for information on this analysis.

Furthermore, the Project would not eliminate bus service along Wilshire Boulevard but rather would supplement it with rail. As explained in Chapter 2, Metro Local, Limited, Rapid, and Express bus service along Wilshire Boulevard will continue to operate in conjunction with the rail system, if approved and implemented. The Wilshire Boulevard Bus Rapid Transit project is also assumed to be in place. Maintenance of local bus service levels is an important component of the transit system serving the Westside Corridor. With the extension the Purple Line subway service to the Westwood/VA Hospital Station, it is estimated that one-third of demand would involve local bus access. Metro continues to seek to improve the region’s transit needs and continually evaluates various transit corridors to achieve a more interconnected transportation system. To help guide design of subway stations, potential enhanced local bus service at stations was assessed and is discussed in Chapter 3 of the Final EIS/EIR.

The Project will be funded primarily through a combination of Measure R local funds and Federal New Starts funds, with some other local, State, and Federal funds. Metro will continue to use a combination of local, State, and Federal funding sources to operate and maintain the system. In addition to these funding sources, Metro relies on fare revenues to fund about one-third of its operating costs. Bus operating funds will not be used to construct the Project, and no fare increases or service reductions are proposed to cover the Project's costs. The selection of the TSM Alternative would not have resulted in lower fares. The Metro Board of Directors establishes fares. Currently, the Base Fare for each boarding is $1.50 and the Metro Day Pass is $5.00. A transfer is the same as the Base Fare - $1.50.

Furthermore, the Westside Subway Extension Project will increase transit options and improve mobility for residents across Los Angeles County, including low-income and minority residents who are transit-dependent. Transit service is meant to serve where the demand is greatest, and these areas are often within neighborhoods that have Environmental Justice (EJ) populations and communities of concern. Four of the seven stations are located in, or adjacent to the Environmental Justice populations identified in Section 4.2.6 of the Final EIS/EIR. Therefore, people living in EJ populations will have the same opportunity to access the transit and mobility improvements provided by the subway.

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. Transit user benefits associated with the LPA are anticipated both along the Project corridor as well as across the region. The transit benefits associated with the LPA are further detailed in Section 3.4 of the Final EIS/EIR.
Your comment in support of the Westside Subway Extension Project has been noted. On October 28, 2010, the Metro Board of Directors identified Alternative 2 (Westwood/VA Hospital Extension) as the Locally Preferred Alternative. Only Alternatives 1 and 2 are affordable within the adopted Long Range Transportation Plan, and between them, Alternative 2 provides higher ridership and improved cost effectiveness. Additionally, Alternative 2 serves the VA Hospital and other communities west of the I-405 more effectively.

Please refer to Sections 2.3, 2.4, and 2.5 of the Final EIS/EIR for an overview of the development of alternatives and the LPA selection process.

Your preference for the inclusion of the West Hollywood connection structure has been noted. On October 28, 2010, the Metro Board of Directors identified Alternative 2 (Westwood/VA Hospital Extension) as the Locally Preferred Alternative (LPA). The Board chose not to include a West Hollywood connection structure in the LPA due to funding constraints.

Additionally, the cost of the connection structure is not sufficiently justified when there may be alternative, less costly solutions to serve the West Hollywood transit market, such as a light rail line. The Draft EIS/EIR showed that there is a market for transit improvements serving West Hollywood, and this corridor is included in the Strategic Element of the 2009 Long Range Transportation Plan. Should funding be identified and secured, further study could be done to identify a project that would be competitive under Federal funding criteria.

Please refer to Sections 2.3, 2.4, and 2.5 of the Final EIS/EIR for an overview of the development of alternatives, including station locations, and the LPA selection process. The Westside Subway Extension Alternatives Screening and Refinement Following Scoping Report provides a more detailed description of the refinements to the Wilshire/La Cienega Station, including the potential connection structure, following Draft EIS/EIR scoping in response to community comments and engineering requirements. This report is available on the Metro Westside Subway Extension Project website: www.metro.net/projects/westside/westside-reports.

Your comment on the Wilshire/Crenshaw Station has been noted. In October 2010, the Metro Board of Directors identified Alternative 2 (Westwood/VA Extension) as the Locally Preferred Alternative (LPA). A Wilshire/Crenshaw Station was not included in the LPA.

The Wilshire/Crenshaw Station would be located in the Park Mile section of Wilshire Boulevard, adjacent to lower density land uses that are not planned for future growth in the
adopted Community Plan and Park Mile Specific Plan. This site is only 0.5 mile from the existing Wilshire/Western Station and does not serve a major north south intersection, as Crenshaw Boulevard terminates at Wilshire Boulevard and does not extend to the north. Because this is a comparatively lower ridership station with a cost of $153 million, eliminating this station from the LPA improves the cost-effectiveness of Alternative 2. Furthermore, future connections from the Westside subway stations along Wilshire Boulevard to the planned Crenshaw/LAX Light Rail Transit project to the south have been recommended to take place at La Brea, La Cienega, or San Vicente rather than at Wilshire/Crenshaw.

Please refer to Sections 2.3, 2.4, and 2.5 of the Final EIS/EIR for an overview of the development of alternatives, including station locations, and the LPA selection process. The Westside Subway Extension Alternatives Screening and Refinement Following Scoping Report provides a more detailed description of the refinements to the Wilshire/Crenshaw Station following Draft EIS/EIR scoping in response to community comments and engineering requirements. This report is available on the Metro Westside Subway Extension Project website: www.metro.net/projects/westside/westside-reports.

Your comment in support of the Century City Constellation Station and station access/ridership projections has been noted. On October 28, 2010, the Metro Board of Directors identified Alternative 2 (Westwood/VA Hospital Extension) as the Locally Preferred Alternative (LPA). As part of the LPA selection, the Metro Board of Directors decided to continue to study both station location options in Century City (Santa Monica Boulevard and Constellation Boulevard) to address concerns raised by the community regarding locating a station directly on a seismic fault and the safety of tunneling under homes and schools.

In response to the Metro Board of Director’s request for more information, further analysis was undertaken to focus on the engineering and environmental aspects of the two options during the preparation of the Final EIS/EIR to expand on the studies conducted in preparation of the Draft EIS/EIR. It should be noted that prior to conducting the comparative study, the Santa Monica Boulevard Station location was shifted slightly to the east from the location in the Draft EIS/EIR to avoid the Santa Monica Fault zone.

During preparation of the Final EIS/EIR, the ridership model from the Draft EIS/EIR was further refined to assess the LPA and incorporate any changes between the Draft EIS/EIR and the Final EIS/EIR. More than ten model runs were conducted to respond to changes, perform additional analysis, and answer questions that were raised during the project development process in the Final EIS/EIR phase. The main types of refinement included feeder bus service, balanced headways and some coding refinement, to determine what changes should be included in the Final EIS/EIR model runs. The refined model predicted...
boardings along the new Westside Subway Extension stations are approximately 49,300 with the Century City Constellation Station, which is about 3,350 more than the predicted 45,986 boardings with the Century City Santa Monica Station. The main difference in boardings at the Century City Station is the increased walk access trips in the Constellation Station over the Santa Monica Station. The walking time between the TAZ 738 (Century City)’s centroid node and the Century City subway station is 3 minutes in the Constellation Option and 13 minutes in the Santa Monica Option. The number of jobs and jobs per square mile in the 1/4-mile and 1/2-mile area around the Century City Stations is much higher in the Constellation Option than in the Santa Monica Option.

In addition to the refined ridership model, a supplemental ridership study was prepared to evaluate the relative accessibility of the Century City Station locations to surrounding commercial and residential development within a 1/2-mile walking distance. This data was then used to estimate the number of Westside Subway Extension riders who would walk to and from the stations. It should be noted that these ridership projections only consider those riders who walk to the station and these projections are intended to supplement the ridership forecasts. This analysis concluded that the Century City Constellation Boulevard Station attracts more Westside Subway riders compared to the station location along Santa Monica Boulevard. Based on both existing and projected future development in Century City, the Constellation Station has the highest concentration of jobs and residents within the critical 600-foot and 1/4-mile walksheds. As a consequence, the 14,005 riders estimated to walk to the Century City Station along Constellation Boulevard is approximately 72 percent greater than the approximately 8,145 riders expected to walk to the Santa Monica Boulevard Station. The Constellation Boulevard Station has the best pedestrian environment, can be expected to attract the most transit riders, and is centrally located to help shape the redevelopment of Century City as an important transit-oriented destination on the Westside Subway Extension.

In addition to ridership studies, the geotechnical studies conducted during preparation of the Final EIS/EIR concluded that tunneling can be safely carried out beneath the Beverly Hills High School campus and the West Beverly Hills, Century City, and Westwood neighborhoods. However, these studies also determined that the Century City Santa Monica Station would cross the West Beverly Hills Lineament, a northern extension of the active Newport-Inglewood Fault, which poses a significant safety risk to passengers at this station location. No evidence of faulting was found at the proposed Century City Constellation Station site.

Based on all of these factors, the Century City Station Location Report concluded by recommending that the Century City Station be located along Constellation Boulevard due to seismic safety concerns at the Santa Monica Boulevard Station and higher ridership projections with Constellation Boulevard Station.
Please refer to Section 8.8.2 and 8.8.3 of the Final EIS/EIR for more detailed responses to concerns related to the Century City Station. Refer to Section 7.3 of the Final EIS/EIR and the Westside Subway Extension Century City Station Location Report for a comparison of the two Century City Station locations. The results of further ridership studies can be found in the Westside Subway Extension Technical Report Summarizing the Results of the Forecasted Alternatives and the Westside Subway Extension Century City TOD and Walk Access Study. The results of further geotechnical investigations in the Century City vicinity can be found in the Westside Subway Extension Century City Area Fault Investigation Report and the Westside Subway Extension Century City Area Tunneling Safety Report. All reports are available on the Metro Westside Subway Extension Project website: www.metro.net/projects/westside/westside-reports.

Your support for Alternative 2 (Westwood/VA Hospital Extension) has been noted. On October 28, 2010, the Metro Board of Directors identified Alternative 2 as the Locally Preferred Alternative. Only Alternatives 1 and 2 are affordable within the adopted Long Range Transportation Plan, and between them, Alternative 2 provides significantly higher ridership and better cost effectiveness. Additionally, Alternative 2 serves the VA Hospital and other communities west of the I-405 more effectively.

Please refer to Sections 2.3, 2.4, and 2.5 of the Final EIS/EIR for an overview of the development of alternatives, including station locations, and the LPA selection process. The Westside Subway Extension Alternatives Screening and Refinement Following Scoping Report provides a more detailed description of the refinements to the Westwood/UCLA and Westwood/VA Hospital Stations following Draft EIS/EIR scoping in response to community comments and engineering requirements. 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/UCLA and Westwood/VA Hospital locations. In addition, the Westside Subway Extension Station Entrance Location Report and Recommendations provides a comparison of the potential entrance locations at Westwood Boulevard, Gayley Avenue and Veteran Avenue for both the On-Street and Off-Street Stations. All reports are available on the Metro Westside Subway Extension Project website: www.metro.net/projects/westside/westside-reports.
Your comment in support of the Century City Constellation Station has been noted. On October 28, 2010, the Metro Board of Directors identified Alternative 2 (Westwood/VA Hospital Extension) as the Locally Preferred Alternative (LPA). As part of the LPA selection, the Metro Board of Directors decided to continue to study both station location options in Century City (Santa Monica Boulevard and Constellation Boulevard) to address concerns raised by the community regarding locating a station directly on a seismic fault and the safety of tunneling under homes and schools.

In response to the Metro Board of Director’s request for more information, further analysis was undertaken to focus on the engineering and environmental aspects of the two options during the preparation of the Final EIS/EIR to expand on the studies conducted in preparation of the Draft EIS/EIR. It should be noted that prior to conducting the comparative study, the Santa Monica Boulevard Station location was shifted slightly to the east from the location in the Draft EIS/EIR to avoid the Santa Monica Fault zone.

The geotechnical studies conducted during preparation of the Final EIS/EIR concluded that tunneling can be safely carried out beneath the Beverly Hills High School campus and the West Beverly Hills, Century City, and Westwood neighborhoods. However, these studies also determined that the Century City Santa Monica Station would cross the West Beverly Hills Lineament, a northern extension of the active Newport-Inglewood Fault, which poses a significant safety risk to passengers at this station location. No evidence of faulting was found at the proposed Century City Constellation Station site.

In addition, the Century City Constellation Boulevard Station has the best pedestrian environment, can be expected to attract the most transit riders, and is centrally located to help shape the redevelopment of Century City as an important transit-oriented destination on the Westside Subway Extension. Further refinements to the ridership analysis concluded that the Century City Constellation Station would result in 3,350 more boardings along new Westside Subway Extension stations than the Century City Santa Monica Station due to proximity to jobs and residences within the critical 600-foot and 1/4-mile walksheds.

Based on all of these factors, the Century City Station Location Report concluded by recommending that the Century City Station be located along Constellation Boulevard due to seismic safety concerns at the Santa Monica Boulevard Station and higher ridership projections with Constellation Boulevard Station.

Please refer to Section 8.8.2 and 8.8.3 of the Final EIS/EIR for more detailed responses to concerns related to the Century City Station. Refer to Section 7.3 of the Final EIS/EIR and the Westside Subway Extension Century City Station Location Report for a comparison of the two Century City Station locations. The results of further geotechnical investigations in the Century City vicinity can be found in the Westside Subway Extension Century City Area.
Fault Investigation Report and the Westside Subway Extension Century City Area Tunneling Safety Report. The results of further ridership studies can be found in the Westside Subway Extension Technical Report Summarizing the Results of the Forecasted Alternatives and the Westside Subway Extension Century City TOD and Walk Access Study. All reports are available on the Metro Westside Subway Extension Project website: www.metro.net/projects/westside/westside-reports.
Appendix H - Response to Comments

WESTSIDE SUBWAY EXTENSION
Draft EIS/EIR – Public Hearings

Written Comment Form

Name/Nombre: Michael C. Clark
Organization/Organización: Self
Address/Dirección: 401 S. Figueroa St., Los Angeles, CA 90071
Tel: 323-937-6470
Fax:
Email:
Meeting Venue: [ ] LACMA [ ] WeHo [ ] Santa Monica [ ] Beverly Hills [ ] Westwood

September 29, 2010

See ATTACHMENT "B"

Public comments on the Draft EIS/EIR will be accepted through October 18, 2010. You may submit your comments by:

- Email to: westsidextension@metro.net
- US Mail to: David Meier, Project Manager, One Gateway Plaza, 99-22-2 Los Angeles, CA, 90012
- Visiting our website metro.net/westside and clicking on "contact us"
- Attending one of the public hearings listed above and verbally providing your comments, which will be captured by a court reporter.
- Submit written comments at a public hearing
ATTACHMENT “B”

My comments at the September 29, 2010 EIS/EIR Meeting, Santa Monica Venue were as follows:

My name is Mike Clark. This is a status update on my $63.4 million Federal Transit Administration (FTA) Grant for the “Park District” around the Wilshire/Fairfax Station and Museum Row.

We have reached consensus on a Distributor Extension to Beverly/San Vicente to serve West Hollywood, Cedars-Sinai and Beverly Center. I have a proposal for Federal funding which I have committed to discuss and pursue with FTA. With only minor envelope changes to the MTA provided Preliminary Engineering drawings for the Beverly/Fairfax Distributor Station, all Grant elements can be maintained including access and Grant funds for the critically important revitalization of “Historic Fairfax” from Beverly to Clinton.

The cooperation and support from both FTA and MTA have been extraordinary. Recently, Doug Failing, Executive Director, MTA, responded to my request for cost estimates for both the Distributor/Station under my Grant, and the potential Extension, by authorizing an excellent, comprehensive PB evaluation and cost estimate(s) under date of March 24, 2010 (attached).

I will continue under Gordon J. Linton’s written Federal instructions and complete FTA’s Private Sector Disclosure requirements. Documenting its bipartisan nature, this Initiative started when the Administrator of Federal Transit sent me a written request to submit. I will return to FTA Headquarters for continued processing to assure timely Grant funding so that the Wilshire/Fairfax Station, Distributor Connection, and Beverly/Fairfax Distributor Station can open simultaneously as part of the initial MOS. All three of these stations can provide extensive Park and Ride facilities on sites that offer outstanding “Joint Development” opportunities. We continue to make excellent progress, thank you.

cc: Douglas R. Failing, P.E., Executive Director, MTA; Susan Schruth, Associate Administrator, FTA, Washington, D.C.; Thomas L. Jenkins, P.E., Vice President, Project Manager, PB; Eli Broid, Trustee, LACMA; Harold S. Jensen; Hank Hilty; Al Gilmour; Rick Caruso, Grove Partnership; Ross Glickman, JMB/Urban (Chicago); CBS, c/o JMB/Urban; Darrell Clarke; Paul Koretz, Councilmember (Historic Fairfax, Cedars-Sinai); Jackie Canter (Canter’s, Historic Fairfax); Mike Feuer, Assemblymember; Arthur T. Leeby, CEO, MTA; Martha Welborne, FAIA, Executive Director, MTA; Richard Katz, Director, MTA Board; Zev Yaroslavsky, Director, MTA Board; Don Knabe, Chair, MTA Board.
People Mover to Farmers Market and Beverly Center – Conceptual Analysis

Two Alternatives Considered:

Option A – Tunneling/Cut and Cover with two Subway Type Stations on Fairfax Avenue and an aerial alignment on Beverly Blvd, with an elevated station at the Beverly Center. Possible people mover technology similar to system employed at Seattle airport system or Las Vegas tram.

Option B – At-Grade Street Car similar to Portland Street Car with two at-grade stations on Fairfax Avenue and an at-grade station at Beverly Center.

Operating and maintenance issues that should be addressed and will impact the operating and maintenance cost include the following:

- Single/Double Track Operations: With the short system length, a single track operation may be possible. Consideration needs to be given to the advantages and disadvantages of operating a single track or double track operation.
- By-Pass Tracks at Farmer's Market Station: cost may include a by pass track/pocket track and/or single track operations.
- At Grade Grade Crossings/Grade Separations
- Tunnel/Cut and Cover/Depressed guideway
- Aerial Structure
- Number of Vehicles and Type of Vehicles
- Manpower, Operators, and Technicians
- Maintenance Facilities and Support Equipment, including Maintenance of Way Equipment
- Passenger Capacity/Scheduled Headways
- Out-Sourcing Considerations
- Environmental Impact Considerations
- Would the extension be operated and maintained by Metro?
- Would a viable option be a Design, Build, Operate and Maintain (DBOM) Contract?

Fire/Life Safety Considerations
People Mover to Farmers Market and Beverly Center – Conceptual Analysis

- Ballasted/Embedded/Direct Fixation Track
- Maintenance of track (noise and vibration tunnel and aerial sections)

From an operations and maintenance perspective, the above issues will have a direct impact on the operations and maintenance cost of either alternative. Option A - Tunneling/Cut and Cover/Aerial Alignment being the most expensive from an operations and maintenance perspective.

An underground design, including the infrastructure, lighting, fire suppression systems, communications, signaling, traction power and an overhead contact wire or other power distribution system will require considerably more maintenance over time than an at-grade alignment.

The safety factors which must be included in a tunnel design consist of: ventilation, fire life/safety requirements, evacuation requirements, emergency generator, and safety critical elements: lighting, communications, and fire life safety requirements.

The scheduled and unscheduled maintenance of a tunnel and aerial structure guideway concept would require more manpower resources compared to an at-grade guideway.

The operating hours will have a proportionally greater impact on the operating and maintenance cost.

If the operating hours are scheduled around the peak passenger considerations, the operations and maintenance cost could be kept to a reasonable level. Eliminating late night service and early morning service would reduce the operating cost and allow for scheduled maintenance to be achieved at considerably reduced labor rates by not occurring during premium work hours.

A Monorail or people mover design (driverless operations) could not be used for an at grade design.

Operations and Maintenance Comparisons

Option A - Tunnel/Cut and Cover and Aerial Structure

PB

3/24/2010
People Mover to Farmers Market and Beverly Center Conceptual Analysis

- Underground Maintenance (Tunnel and Stations)
- Ventilation and Fans Maintenance and Testing
- Safety Crucial Elements (as noted above)
- Emergency Egress Elements
- Traction Power Sub-Stations
- Escalators and Elevators
- Communication
- Signaling
- Pumps

Option B: At-grade Street Car

- No underground station and/or tunnel maintenance
- Station maintenance less demanding
- No ventilation maintenance or testing, including ventilation fans
- No fire suppression maintenance and/or testing, sprinklers or stand pipe
- No stray current maintenance or testing
- No overline and/or elevator maintenance
- No normal or emergency lighting; tunnel and/or at-grade structure
- Adequate protection for at grade crossings - An alternative to railroad type crossing equipment should be evaluated.
## DETAIL ESTIMATE

**Westside Subway Extension**
**Final Environmental Impact Statement/Environmental Impact Report**

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**Total Estimated Budget**

|                      | $43,032,800 |

**Appendix H - Response to Comments**

March 2012

Page H-6.1-337
### DETAIL ESTIMATE

**NOTE:** All costs are in thousands of dollars (USD).

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**Notes:**
- All costs are in thousands of dollars (USD).
- Design includes administration and general contingency.
- General and administrative costs include general contingency.
- Net-back reflects net-back from construction.
- All costs are subject to future adjustments.

**Total Construction Costs:** $10,000,000
Your comment in support of the Century City Constellation Station has been noted. On October 28, 2010, the Metro Board of Directors identified Alternative 2 (Westwood/VA Hospital Extension) as the Locally Preferred Alternative (LPA). As part of the LPA selection, the Metro Board of Directors decided to continue to study both station location options in Century City (Santa Monica Boulevard and Constellation Boulevard) to address concerns raised by the community regarding locating a station directly on a seismic fault and the safety of tunneling under homes and schools.

In response to the Metro Board of Directors’ request for more information, further analysis was undertaken to focus on the engineering and environmental aspects of the two options during the preparation of the Final EIS/EIR to expand on the studies conducted in preparation of the Draft EIS/EIR. It should be noted that prior to conducting the comparative study, the Santa Monica Boulevard Station location was shifted slightly to the east from the location in the Draft EIS/EIR to avoid the Santa Monica Fault zone.

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Based on all of these factors, the Century City Station Location Report concluded by recommending that the Century City Station be located along Constellation Boulevard due to seismic safety concerns at the Santa Monica Boulevard Station and higher ridership projections with Constellation Boulevard Station.

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From: Woodrow Clark II [wwclark13@gmail.com]  
To: Westside Extension  
CC:  
Subject: Re: Metro Westside Subway DEIS/DEIR Release & Public Hearings  

One more time, mis-information and bad service. The web link does not specify the draft EIR. Please send it asap to this email address as an attachment.  
Thanks.  
WWClark  

On Fri, Sep 3, 2010 at 10:47 AM, Westside Subway Extension <WestsideExtension@metro.net> wrote:

Westside Subway Extension

Westside Subway Extension Public Hearings on Draft EIS/EIR

The Draft EIS/EIR for the Westside Subway Extension has been released for public review and comment. Copies of the document are available at [metro.net/westside](http://metro.net/westside) and at the below listed libraries.

Please plan to attend one of the five public hearings as this will be an opportunity for you to learn more about the project alternatives, issues addressed in the Draft EIS/EIR, and share your opinions or questions.

All hearings are 6-8pm.

**Monday, September 20**
LACMA West - Terrace Room, 5th Floor  
5905 Wilshire Boulevard, Los Angeles, CA 90036  
Served by Metro Lines 20, 720, 920, 217 & 780.  
Validated vehicle parking is available in the Museum's 6th Street underground garage. Enter from 6th and Ogden.  
Spanish & Korean translation will be provided

For added convenience, we will offer a live webcast of this meeting that you can view from any computer simply by going to [metro.net/westside](http://metro.net/westside)

**Tuesday, September 21**
Westwood United Methodist Church - Fellowship Hall, 3rd Floor  
10497 Wilshire Boulevard, Los Angeles, CA 90024  
Served by Metro Line 20  
Free parking is available below Belmont Village, the building east of the Sanctuary. From Wilshire Blvd., use the Belmont Village driveway and proceed under the overhang to the underground parking lot. Park on levels P2, P3 or P4 and take the church elevator in the southwest corner of the parking lot. There will be signs to direct you to the meeting room.  
Spanish translation will be provided.

Metro staff received your request for information and provided the requested document during the public comment period.
Wednesday, September 22
Plummer Park – Community Center
7377 Santa Monica Boulevard, West Hollywood, CA 90046
Served by Metro Line 4.
Free vehicle and bike parking is available.
Russian translation will be provided.

Monday, September 27
Roxbury Park - Auditorium
471 S. Roxbury Drive, Beverly Hills, CA 90212
Served by Metro Lines 28 and Santa Monica Big Blue Bus Line 5.
Metered parking is available along Roxbury Drive.
Spanish translation will be provided.
For added convenience, we will offer a live webcast of this meeting that you can view from any computer simply by going to metro.net/westside

Wednesday, September 29, 2010
Santa Monica Main Library
601 Santa Monica Boulevard, Santa Monica, CA 90401
Served by Metro Lines 4, 20, 733 & 720 and Santa Monica Big Blue Bus Lines 1, 2, 3, 7, 8, 9, and 10.
Validated vehicle and free bike parking is available.
Spanish translation will be provided.

Where to find copies of the Draft EIS/ EIR:
The Draft EIS/EIR is available for review by visiting metro.net/westside. Copies are also available at the following libraries:

Beverly Hills Public Library
444 North Rexford Drive, Beverly Hills 90210

Donald Bruce Kaufman - Brentwood Library
11820 San Vicente Blvd., Los Angeles 90049

Fairfax Library
161 S. Gardner St., Los Angeles 90036

Felipe de Neve Library
2820 W. Sixth St., Los Angeles 90057

Frances H. G. Hollywood Regional Library
1623 N. Ivar Ave., Hollywood 90028

John C. Fremont Library
6221 Melrose Ave., Los Angeles 90038

Memorial Library
4625 W. Olympic Blvd., Los Angeles 90019

Metro Transportation Library
Public comments on the Draft EIR will be accepted through October 18, 2010. You may submit your comments by:

> Email to: westsideextension@metro.net
> US Mail to: David Mieger, Project Manager, One Gateway Plaza, 99-22-2 Los Angeles, CA, 90012
> Visiting our website metro.net/westside and clicking on “contact us”
> Attending one of the public hearings listed above and verbally providing your comments which will be captured by a court reporter.

ADA Requirements: Special accommodations are available to the public for MTA-sponsored meetings. All requests for reasonable accommodations must be made at least three working days (72 hours) in advance of the scheduled meeting date. Please telephone the project information line at 213.922.6934. Our TDD line is 800.252-9040.

For more information about the Metro Westside Subway Extension, go to:
metro.net/westside

Find us on Facebook: Facebook.com/WestsideSubwayExtension

Follow us on Twitter:
Twitter.com/WestsideSubway

As always, many thanks for following us through this subway planning effort.
Appendix H - Response to Comments

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Woodrow W. Clark, II, MA3, PhD.
Managing Director
Clark Strategic Partners
PO Box #17975
Beverly Hills, CA
USA 90209
www.wwclark13@gmail.com
TEL: +1 (310) 858-6886
FAX: +1 (310) 858-6881
web site: www.clarkstrategicpartners.net
Your preference for the TSM Alternative has been noted. On October 28, 2010, the Metro Board of Directors identified Alternative 2 (Westwood/VA Hospital Extension) as the Locally Preferred Alternative (LPA). Alternative 2 was selected as the LPA because the analysis in the Draft EIS/EIR demonstrated that the Build Alternatives would be more effective than the TSM Alternative in terms of enhancing mobility, serving development opportunities, and addressing other aspects of the Purpose and Need for the Project. Please refer to Chapter 7 of the Draft EIS/EIR and Section 2.5 of the Final EIS/EIR for information on this analysis.

Furthermore, the Project would not eliminate bus service along Wilshire Boulevard but rather would supplement it with rail. As explained in Chapter 2, Metro Local, Limited, Rapid, and Express bus service along Wilshire Boulevard will continue to operate in conjunction with the rail system, if approved and implemented. The Wilshire Boulevard Bus Rapid Transit project is also assumed to be in place. Maintenance of local bus service levels is an important component of the transit system serving the Westside Corridor. With the extension the Purple Line subway service to the Westwood/VA Hospital Station, it is estimated that one-third of demand would involve local bus access. Metro continues to seek to improve the region’s transit needs and continually evaluates various transit corridors to achieve a more interconnected transportation system. To help guide design of subway stations, potential enhanced local bus service at stations was assessed and is discussed in Chapter 3 of the Final EIS/EIR.

The Project will be funded primarily through a combination of Measure R local funds and Federal New Starts funds, with some other local, State, and Federal funds. Metro will continue to use a combination of local, State, and Federal funding sources to operate and maintain the system. In addition to these funding sources, Metro relies on fare revenues to fund about one-third of its operating costs. Bus operating funds will not be used to construct the Project, and no fare increases or service reductions are proposed to cover the Project’s costs. The selection of the TSM Alternative would not have resulted in lower fares. The Metro Board of Directors establishes fares. Currently, the Base Fare for each boarding is $1.50 and the Metro Day Pass is $5.00. A transfer is the same as the Base Fare - $1.50.

Furthermore, the Westside Subway Extension Project will increase transit options and improve mobility for residents across Los Angeles County, including low-income and minority residents who are transit-dependent. Transit service is meant to serve where the demand is greatest, and these areas are often within neighborhoods that have Environmental Justice (EJ) populations and communities of concern. Four of the seven stations are located in, or adjacent to the Environmental Justice populations identified in Section 4.2.6 of the Final EIS/EIR. Therefore, people living in EJ populations will have the same opportunity to access the transit and mobility improvements provided by the subway.

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. Transit user benefits associated with the LPA are anticipated both along the Project corridor as well as across the region. The transit benefits associated with the LPA are further detailed in Section 3.4 of the Final EIS/EIR.
Your comment regarding the length of the alignment has been noted. On October 28, 2010, the Metro Board of Directors identified Alternative 2 (Westwood/VA Hospital Extension) as the Locally Preferred Alternative (LPA). This alternative is the longest alignment that is affordable with available funds. In selecting a route, Metro considered several factors, including ridership, user benefits, travel time, capital costs, performance characteristics, and environmental impacts. If the LPA is approved for implementation by the Metro Board, the LPA will be designed so as not to preclude future westward extension.

Please refer to Sections 2.3, 2.4, and 2.5 of the Final EIS/EIR for an overview of the development of alternatives and the LPA selection process.
October 12, 2010

Honorable Don Knabe, Chair
Los Angeles County Metropolitan Transportation Authority
One Gateway Plaza
Los Angeles, CA 90012-2952

Dear Chairman Knabe:

I, Susan Coddington, President of Chelsea Design Group Inc., Interior Design and Architecture, wholeheartedly support the Westside extension of the subway and continue to be a strong advocate for the creation of new public transit options for the community. We are encouraged by the progress Metro is making towards achieving this goal and want to contribute our comments to the Draft Environmental Review (DER) document now in circulation.

In order to serve this community with the most ridership, we believe that the Constellation Boulevard and Avenue of the Stars station alignment should be adopted for several reasons:

- It will bring passengers to the heart of Century City, providing both convenience to travelers, as well as increased ridership which will benefit everyone.
- With nearly 40,000 employees within Century City clustered around this intersection, they are more likely to use the subway for both commuting and for trips during the day if the portal is conveniently located.

Thank you for your attention to our views. We look forward to the subway reaching Century City at the corners of Constellation Boulevard and Avenue of the Stars.

Sincerely,

Susan Coddington, President

Cc: Mayor Antonio Villaraigosa
L.A. County Supervisor
200 No. Spring Street
Los Angeles, CA 90012

Honorable Zev Yaroslavsky
City Hall
Los Angeles, CA 90012

Zev.Yaroslavsky@lacity.org

827-1

Your comment in support of the Century City Constellation Station and station access/ridership projections has been noted. On October 28, 2010, the Metro Board of Directors identified Alternative 2 (Westwood/VA Hospital Extension) as the Locally Preferred Alternative (LPA). As part of the LPA selection, the Metro Board of Directors decided to continue to study both station location options in Century City (Santa Monica Boulevard and Constellation Boulevard) to address concerns raised by the community regarding locating a station directly on a seismic fault and the safety of tunneling under homes and schools.

In response to the Metro Board of Director’s request for more information, further analysis was undertaken to focus on the engineering and environmental aspects of the two options during the preparation of the Final EIS/EIR to expand on the studies conducted in preparation of the Draft EIS/EIR. It should be noted that prior to conducting the comparative study, the Santa Monica Boulevard Station location was shifted slightly to the east from the location in the Draft EIS/EIR to avoid the Santa Monica Fault zone.

During preparation of the Final EIS/EIR, the ridership model from the Draft EIS/EIR was further refined to assess the LPA and incorporate any changes between the Draft EIS/EIR and the Final EIS/EIR. More than ten model runs were conducted to respond to changes, perform additional analysis, and answer questions that were raised during the project development process in the Final EIS/EIR phase. The main types of refinement included feeder bus service, balanced headways and some coding refinement, to determine what changes should be included in the Final EIS/EIR model runs. The refined model predicted boardings along the new Westside Subway Extension stations are approximately 49,300 with the Century City Constellation Station, which is about 3,500 more than the predicted 45,986 boardings with the Century City Santa Monica Station. The main difference in boardings at the Century City Station is the increased walk access trips in the Constellation Station over the Santa Monica Station. The walking time between the TAZ 738 (Century City)’s centroid node and the Century City subway station is 3 minutes in the Constellation Option and 13 minutes in the Santa Monica Option. The number of jobs and jobs per square mile in the 1/4-mile and 1/2-mile area around the Century City Stations is much higher in the Constellation Option than in the Santa Monica Option.

In addition to the refined ridership model, a supplemental ridership study was prepared to evaluate the relative accessibility of the Century City Station locations to surrounding commercial and residential development within a 1/2-mile walking distance. This data was then used to estimate the number of Westside Subway Extension riders who would walk to and from the stations. It should be noted that these ridership projections only consider those riders who walk to the station and these projections are intended to supplement the ridership forecasts. This analysis concluded that the Century City Constellation Boulevard Station attracts more Westside Subway riders compared to the station location along Santa Monica Boulevard. Based on both existing and projected future development in Century...
City, the Constellation Station has the highest concentration of jobs and residents within the critical 600-foot and 1/4-mile walksheds. As a consequence, the 14,005 riders estimated to walk to the Century City Station along Constellation Boulevard is approximately 72 percent greater than the approximately 8,145 riders expected to walk to the Santa Monica Boulevard Station. The Constellation Boulevard Station has the best pedestrian environment, can be expected to attract the most transit riders, and is centrally located to help shape the redevelopment of Century City as an important transit-oriented destination on the Westside Subway Extension.

In addition to ridership studies, the geotechnical studies conducted during preparation of the Final EIS/EIR concluded that tunneling can be safely carried out beneath the Beverly Hills High School campus and the West Beverly Hills, Century City, and Westwood neighborhoods. However, these studies also determined that the Century City Santa Monica Station would cross the West Beverly Hills Lineament, a northern extension of the active Newport-Inglewood Fault, which poses a significant safety risk to passengers at this station location. No evidence of faulting was found at the proposed Century City Constellation Station site.

Based on all of these factors, the Century City Station Location Report concluded by recommending that the Century City Station be located along Constellation Boulevard due to seismic safety concerns at the Santa Monica Boulevard Station and higher ridership projections with Constellation Boulevard Station.

Please refer to Section 8.8.2 and 8.8.3 of the Final EIS/EIR for more detailed responses to concerns related to the Century City Station. Refer to Section 7.3 of the Final EIS/EIR and the Westside Subway Extension Century City Station Location Report for a comparison of the two Century City Station locations. The results of further ridership studies can be found in the Westside Subway Extension Technical Report Summarizing the Results of the Forecasted Alternatives and the Westside Subway Extension Century City TOD and Walk Access Study. The results of further geotechnical investigations in the Century City vicinity can be found in the Westside Subway Extension Century City Area Fault Investigation Report and the Westside Subway Extension Century City Area Tunneling Safety Report. All reports are available on the Metro Westside Subway Extension Project website: www.metro.net/projects/westside/westside-reports.
Your preference for the TSM Alternative has been noted. On October 28, 2010, the Metro Board of Directors identified Alternative 2 (Westwood/VA Hospital Extension) as the Locally Preferred Alternative (LPA). Alternative 2 was selected as the LPA because the analysis in the Draft EIS/EIR demonstrated that the Build Alternatives would be more effective than the TSM Alternative in terms of enhancing mobility, serving development opportunities, and addressing other aspects of the Purpose and Need for the Project. Please refer to Chapter 7 of the Draft EIS/EIR and Section 2.5 of the Final EIS/EIR for information on this analysis.

Furthermore, the Project would not eliminate bus service along Wilshire Boulevard but rather would supplement it with rail. As explained in Chapter 2, Metro Local, Limited, Rapid, and Express bus service along Wilshire Boulevard will continue to operate in conjunction with the rail system, if approved and implemented. The Wilshire Boulevard Bus Rapid Transit project is also assumed to be in place. Maintenance of local bus service levels is an important component of the transit system serving the Westside Corridor. With the extension the Purple Line subway service to the Westwood/VA Hospital Station, it is estimated that one-third of demand would involve local bus access. Metro continues to seek to improve the region’s transit needs and continually evaluates various transit corridors to achieve a more interconnected transportation system. To help guide design of subway stations, potential enhanced local bus service at stations was assessed and is discussed in Chapter 3 of the Final EIS/EIR.

The Project will be funded primarily through a combination of Measure R local funds and Federal New Starts funds, with some other local, State, and Federal funds. Metro will continue to use a combination of local, State, and Federal funding sources to operate and maintain the system. In addition to these funding sources, Metro relies on fare revenues to fund about one-third of its operating costs. Bus operating funds will not be used to construct the Project, and no fare increases or service reductions are proposed to cover the Project’s costs. The selection of the TSM Alternative would not have resulted in lower fares. The Metro Board of Directors establishes fares. Currently, the Base Fare for each boarding is $1.50 and the Metro Day Pass is $5.00. A transfer is the same as the Base Fare - $1.50.

Furthermore, the Westside Subway Extension Project will increase transit options and improve mobility for residents across Los Angeles County, including low-income and minority residents who are transit-dependent. Transit service is meant to serve where the demand is greatest, and these areas are often within neighborhoods that have Environmental Justice (EJ) populations and communities of concern. Four of the seven stations are located in, or adjacent to the Environmental Justice populations identified in Section 4.2.6 of the Final EIS/EIR. Therefore, people living in EJ populations will have the same opportunity to access the transit and mobility improvements provided by the subway.

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. Transit user benefits associated with the LPA are anticipated both along the Project corridor as well as across the region. The transit benefits associated with the LPA are further detailed in Section 3.4 of the Final EIS/EIR.

Your comment regarding a bus that will go to the airport has been noted. Please refer to Chapter 7 of the Draft EIS/EIR for the comparative information on the alternatives analysis concerning options for the LPA. In addition refer to Chapter 2 (Section Alternatives Analysis Study Screening and Selection Process). Only alternatives that would meet the purpose and need of the Project were advanced into the DEIS and FEIS. A bus to the airport would not address that. However, several bus and rail routes currently serve the airport such as the Local 42 and the Flyaway from Union Station. Additional connections are under study such as those from the Green Line.
Your comment in support of the Westside Subway Extension Project has been noted. On October 28, 2010, the Metro Board of Directors identified Alternative 2 (Westwood/VA Hospital Extension) as the Locally Preferred Alternative. Only Alternatives 1 and 2 are affordable within the adopted Long Range Transportation Plan, and between them, Alternative 2 provides higher ridership and improved cost effectiveness. Additionally, Alternative 2 serves the VA Hospital and other communities west of the I-405 more effectively.

Please refer to Sections 2.3, 2.4, and 2.5 of the Final EIS/EIR for an overview of the development of alternatives and the LPA selection process.

Your preference for a modified Westwood/VA Hospital Station location has been noted. During the Draft EIS/EIR scoping, the public suggested that an additional station should be provided west of I-405 because of the large distance between a Westwood/UCLA and a Wilshire/Bundy Station, as well as a desire to serve communities west of the I-405 more effectively. In response, five proposed stations west of I-405 were studied—two at Westwood/VA Hospital (one north of Wilshire and one south of Wilshire), Wilshire/Federal, Wilshire/Barrington, and Wilshire/Bundy. In analyzing the proposed stations, the potential to serve as a terminus station was an important consideration. In addition, all of the stations except for the stations at Westwood/VA Hospital are located too far west to be funded as part of Measure R and beyond the adopted LRTP.

The Wilshire/Federal Station would have been located on a site currently used by the U.S. Army Reserve, and the site was determined to be too small to accommodate the subway station without impacting adjacent historic homes in the VA property. From an engineering perspective, this also would have been a challenging site to construct a subway station because of the sharp curve of Wilshire Boulevard. Therefore, the Wilshire/Federal Station was eliminated from further consideration.

The Wilshire/Barrington Station would be located slightly west of the proposed Wilshire/Federal Station. While the Wilshire/Barrington Station is in a high density area with high ridership potential, comments were received from the community during scoping in opposition to locating a terminus station at Wilshire/Barrington due to traffic congestion and dense development concerns. Furthermore, the Wilshire/Barrington Station was not as evenly spaced between the Westwood/UCLA Station and the Wilshire/Bundy Station as is the Westwood/VA Hospital Station.

The Wilshire/Bundy Station is the farthest west of the terminus station considered and provided better potential transit connections as it aligns with the future planned Expo station at Olympic/Bundy. However, it is beyond Measure R funding.
Based on all of these considerations, and especially the fact that only the Westwood/VA Hospital Station is fundable within Measure R, the Wilshire/Federal, Wilshire/Barrington, and Wilshire/Bundy Stations were eliminated as potential terminus stations for the fundable Measure R alternatives. Both the North and South Options at the Westwood/VA Hospital Station were carried forward for further analysis in the Draft EIS/EIR. The Wilshire/Bundy Station was also carried forward into the Draft EIS/EIR as part of the Santa Monica Extension, which is beyond available Measure R funding, and would not serve as a terminus station.

Your comment regarding accessibility of the Westwood/VA Hospital Station has been noted. Convenient and safe access by pedestrians and bicyclists will be an important element of the design of all station areas, including the Westwood/VA Hospital Station. 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. Potential impacts to interfacing transportation networks, including bus transit (specifically, the location of bus stops), and pedestrian and bicycle facilities (pedestrian crossings and bicycle lanes) are also presented in Section 3.7 of this Final EIS/EIR.

In preparation of this Final EIS/EIR, the station box and station entrance for the Westwood/VA Hospital South Station was shifted north from the location evaluated in the Draft EIS/EIR. Based on feedback from the VA and the public, the station box was shifted to the far northern end of the parking lot to allow the VA to more easily develop their property in the future and to improve public access to the station. This station location farther from the VA Hospital also facilitates a clearer delineation between station activities and VA activities on the VA Campus.

Currently, Wilshire Boulevard and Bonsall Avenue are grade-separated with Bonsall Avenue passing beneath Wilshire Boulevard. For the Westwood/VA Hospital South Station, the proposed station entrance, as detailed in Section 2.6 of this Final EIS/EIR, would be located on the Bonsall level, beneath the bus drop-off area to the north of the VA Hospital parking lot. The existing bus drop-off area at the Wilshire level on the north and south sides of Wilshire Boulevard would remain the same. A passenger drop-off area would also be provided on the Wilshire level within the bus drop-off area on the north side of Wilshire Boulevard.

For the Westwood/VA Hospital North Station, the station entrance would be located along the north side of Wilshire Boulevard, just west of Bonsall Avenue and south of the station.
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box on the Bonsall level, as detailed in Section 2.6 of this Final EIS/EIR. The existing bus
drop-off area at the Wilshire level on the north and south sides of Wilshire Boulevard would
remain the same.

Since the entrance for both the North and South stations are located along Wilshire
Boulevard at Bonsall Avenue, on the Bonsall level, there are no major differences between
the two stations for the purposes of evaluating station circulation. However, Section 3.7 of
this Final EIS/EIR concludes that both the North and South entrance at the Westwood/VA
Hospital Station will result in increased hazards to pedestrians and bicyclists due to a
design feature or incompatible uses and will conflict with adopted plans or policies related
to public transit, bicycle, or pedestrian facilities prior to mitigation. To improve access, the
following mitigation measures will be implemented at the Westwood/VA Hospital Station
(North or South):

• T-8-Install High-Visibility Crosswalk
• T-9-Provide consistency with General Plan Designation Sidewalk Width Adjacent to
  Metro-Controlled Parcels
• T-10-Provide consistency with General Plan Designation Sidewalk Width Coordination
  with Jurisdictions
• T-11-Provide High Visibility Crosswalk Treatments
• T-12-Meet Federal, State, and Local Standards for Crossing
• T-13-Meet Metro Rail Design Criteria Minimums for Bicycle Parking
• T-14-Study Bicycle Parking Demand and Footprint Configuration
• T-16-Study Bus-Rail Interface

With implementation of these measures, impacts to the interfacing pedestrian and bicycle
networks and bus stops will be mitigated to less than significant levels at the Westwood/VA
Hospital Station. While it is acknowledged that streets in the vicinity of the
Westwood/VA Hospital Station are wide, pedestrian and bicycle movements in the study
area can still occur without major barriers. The vicinity of the Westwood/VA Hospital Station
does contain a network of sidewalks, including connections between potential future rail
station entrances and nearby activities. Escalators will provide easy connections from the
bus turnouts on Wilshire Boulevard to the Bonsall level, making transfers between bus and
subway relatively convenient.

Please refer to Section 8.8.5 of the Final EIS/EIR for more detailed responses to concerns
related to the Westwood/VA Hospital Station. Please refer to Sections 2.3, 2.4, and 2.5 of
the Final EIS/EIR for an overview of the development of alternatives, including station
locations, and the LPA selection process. The Westside Subway Extension Alternatives
Screening and Refinement Following Scoping Report provides a more detailed description
of the refinements to the Westwood/VA Hospital Station following Draft EIS/EIR scoping in
response to community comments and engineering requirements. 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 Station 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 3.7 provides an analysis of potential impacts to pedestrian, bicycle, and bus networks. All reports are available on the Metro Westside Subway Extension Project website: www.metro.net/projects/westside/westside-reports.
Your preference for the TSM Alternative has been noted. On October 28, 2010, the Metro Board of Directors identified Alternative 2 (Westwood/VA Hospital Extension) as the Locally Preferred Alternative (LPA). Alternative 2 was selected as the LPA because the analysis in the Draft EIS/EIR demonstrated that the Build Alternatives would be more effective than the TSM Alternative in terms of enhancing mobility, serving development opportunities, and addressing other aspects of the Purpose and Need for the Project. Please refer to Chapter 7 of the Draft EIS/EIR and Section 2.5 of the Final EIS/EIR for information on this analysis.

Furthermore, the Project would not eliminate bus service along Wilshire Boulevard but rather would supplement it with rail. As explained in Chapter 2, Metro Local, Limited, Rapid, and Express bus service along Wilshire Boulevard will continue to operate in conjunction with the rail system, if approved and implemented. The Wilshire Boulevard Bus Rapid Transit project is also assumed to be in place. Maintenance of local bus service levels is an important component of the transit system serving the Westside Corridor. With the extension the Purple Line subway service to the Westwood/VA Hospital Station, it is estimated that one-third of demand would involve local bus access. Metro continues to seek to improve the region's transit needs and continually evaluates various transit corridors to achieve a more interconnected transportation system. To help guide design of subway stations, potential enhanced local bus service at stations was assessed and is discussed in Chapter 3 of the Final EIS/EIR.

The Project will be funded primarily through a combination of Measure R local funds and Federal New Starts funds, with some other local, State, and Federal funds. Metro will continue to use a combination of local, State, and Federal funding sources to operate and maintain the system. In addition to these funding sources, Metro relies on fare revenues to fund about one-third of its operating costs. Bus operating funds will not be used to construct the Project, and no fare increases or service reductions are proposed to cover the Project's costs. The selection of the TSM Alternative would not have resulted in lower fares. The Metro Board of Directors establishes fares. Currently, the Base Fare for each boarding is $1.50 and the Metro Day Pass is $5.00. A transfer is the same as the Base Fare - $1.50.

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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. Transit user benefits associated with the LPA are anticipated both along the Project corridor as well as across the region. The transit benefits associated with the LPA are further detailed in Section 3.4 of the Final EIS/EIR.
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Furthermore, the Project would not eliminate bus service along Wilshire Boulevard but rather would supplement it with rail. As explained in Chapter 2, the Westside Subway Extension Project will include local, limited, rapid, and express bus service along Wilshire Boulevard will continue to operate in conjunction with the rail system, if approved and implemented. The Wilshire Boulevard Bus Rapid Transit project is also assumed to be in place. Maintenance of local bus service levels is an important component of the transit system serving the Westside Corridor. With the extension the Purple Line subway service to the Westwood/VA Hospital Station, it is estimated that one-third of demand would involve local bus access. Metro continues to seek to improve the region's transit needs and continually evaluates various transit corridors to achieve a more interconnected transportation system. To help guide design of subway stations, potential enhanced local bus service at stations was assessed and is discussed in Chapter 3 of the Final EIS/EIR.

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Thank You,

The Westside Subway Extension is an incredibly critical project and should be built as quickly and safely as possible. Metro staff has done a fine job identifying possible alternatives, including routing and station options, as well as involving the public. What follows are my thoughts about the project, starting with the highest priority items.

17-1 Westwood/UCLA station. Please locate this on Constellation Blvd. This is the center of Century City, this is where the jobs are, this is where people want to go. Please do not build the station on Santa Monica Blvd, just because people have unfounded fears of vibrations. L.A.’s existing subway tunnels already cross under private property in several locations, with no noise or vibration at the surface. The new tunnels will be at least 50 feet under Beverly Hills. Plus depending on the option, the tunnels will pass under only a few homes: either 4 or 22 homes, to be precise. Folks have used every excuse in the book for three decades now, trying to stop or divert this much-needed subway. Don’t relocate this station just for them.

17-2 Century City station. Please locate this on Constellation Blvd. This is the center of Century City, this is where the jobs are, this is where people want to go. Please do not build the station on Santa Monica Blvd, just because people have unfounded fears of vibrations. L.A.’s existing subway tunnels already cross under private property in several locations, with no noise or vibration at the surface. The new tunnels will be at least 50 feet under Beverly Hills. Plus depending on the option, the tunnels will pass under only a few homes: either 4 or 22 homes, to be precise. Folks have used every excuse in the book for three decades now, trying to stop or divert this much-needed subway. Don’t relocate this station just for them.

17-3 Westwood/UCLA station. Please locate this on Westwood Blvd. A major station like this should be in the most central location possible. Wilshire/Westwood is central, Wilshire/Gayley is not. It is key to the subway’s success that it connects well to local circulator buses and cross-boulevard buses. Westwood Blvd. is the best place for this. The goal is to encourage UCLA’s tens of thousands of commuters, as well as local residents, to use the subway.

17-4 Fairfax station. Please located this under Fairfax/Wilshire (the "east option"), not west of it. The east option will better serve LACMA, which is a major destination and cultural institution. Also, the entrance locations for the "east option" station will provide easier transfers to northbound and southbound buses.

17-5 La Cienega station. Please locate this east of La Cienega, not west of it. The dense commercial district is located east of La Cienega. The West Hollywood branch (if it is built) will not need direct access to Wilshire/La Cienega (since it already has stations on both streets anyway). Do, however, build the "Track Connection Structure" to the west, to allow for a West Hollywood branch in the future.

17-6 All stations. Please build every station with at least two entrances, on opposite sides of the boulevard. I understand the construction and cost issues involved with building extra entrances, but we are going to live with these subways for decades, so it’s imperative they be done right. An excellent example of a good station is Pershing Square, with entrances on three corners, up to a block away from each other. Wilshire/Western, on the other hand, is an example of a station with only one (massive) portal entrance. No entrance on the south side of Wilshire, and none on the west side of Western. Entrances can’t possibly be that hard or costly to build, right?

17-7 Crenshaw station. I would prefer this not be built. I think it is unnecessary, given the low residential density and lack of destinations within walking distance, and given the fact that transfers can be done equally well at Western or La Brea. The cost of the station is unjustified, in my opinion, although I understand some may disagree with me on this.

Thank You,

Joel Covarrubias
3610 Walnut Avenue
Long Beach, CA 90807

17-1 Your comment about the project schedule has been noted. In April 2010, the Metro Board of Directors adopted the America Fast Forward 30/10 Initiative that directs that the Westside Subway Extension Project to seek accelerated federal funding to deliver the Project in a single phase to Westwood. Based on this accelerated funding schedule, the parallel construction of portions of the alignment and stations would allow the entire LPA to be open and operational to the Westwood/VA Hospital Station in 2022 as a single phase.

In the event that accelerated federal funding cannot be secured, the LPA would be constructed in three sequential phases in accordance with the Metro Long Range Transportation Plan. The first phase to the Wilshire/La Cienega Station would open in 2020, the second phase to the Century City Station would open in 2026, and the final phase to the Westwood/VA Hospital Station would open in 2036.

Please refer to Section 2.6.11 of the Final EIS/EIR for further information on the construction schedule.

17-2 Your comment in support of the Century City Constellation Boulevard Station has been noted. On October 28, 2010, the Metro Board of Directors identified Alternative 2 (Westwood/VA Hospital Extension) as the Locally Preferred Alternative (LPA). As part of the LPA selection, the Metro Board of Directors decided to continue to study both station location options in Century City (Santa Monica Boulevard and Constellation Boulevard) to address concerns raised by the community regarding locating a station directly on a seismic fault and the safety of tunneling under homes and schools.

In response to the Metro Board of Director’s request for more information, further analysis was undertaken to focus on the engineering and environmental aspects of the two options during the preparation of the Final EIS/EIR to expand on the studies conducted in preparation of the Draft EIS/EIR. It should be noted that prior to conducting the comparative study, the Santa Monica Boulevard Station location was shifted slightly to the east from the location in the Draft EIS/EIR to avoid the Santa Monica Fault zone.

The geotechnical studies conducted during preparation of the Final EIS/EIR concluded that tunneling can be safely carried out beneath the Beverly Hills High School campus and the West Beverly Hills, Century City, and Westwood neighborhoods. However, these studies also determined that the Century City Santa Monica Station would cross the West Beverly Hills Lineament, a northern extension of the active Newport-Inglewood Fault, which poses a significant safety risk to passengers at this station location. No evidence of faulting was found at the proposed Century City Constellation Station site.

In addition, the Century City Constellation Boulevard Station has the best pedestrian environment, can be expected to attract the most transit riders, and is centrally located to
help shape the redevelopment of Century City as an important transit-oriented destination on the Westside Subway Extension. Further refinements to the ridership analysis concluded that the Century City Constellation Station would result in 3,350 more boardings along new Westside Subway Extension stations than the Century City Santa Monica Station due to proximity to jobs and residences within the critical 600-foot and 1/4-mile walksheds.

Based on all of these factors, the Century City Station Location Report concluded by recommending that the Century City Station be located along Constellation Boulevard due to seismic safety concerns at the Santa Monica Boulevard Station and higher ridership projections with Constellation Boulevard Station.

Please refer to Section 8.8.2 and 8.8.3 of the Final EIS/EIR for more detailed responses to concerns related to the Century City Station. Refer to Section 7.3 of the Final EIS/EIR and the Westside Subway Extension Century City Station Location Report for a comparison of the two Century City Station locations. The results of further geotechnical investigations in the Century City vicinity can be found in the Westside Subway Extension Century City Area Fault Investigation Report and the Westside Subway Extension Century City Area Tunneling Safety Report. The results of further ridership studies can be found in the Westside Subway Extension Technical Report Summarizing the Results of the Forecasted Alternatives and the Westside Subway Extension Century City TOD and Walk Access Study. All reports are available on the Metro Westside Subway Extension Project website: www.metro.net/projects/westside/westside-reports.

Your preference for the On-Street location of the Westwood/UCLA Station has been noted. On October 28, 2010, the Metro Board of Directors identified Alternative 2 (Westwood/VA Hospital Extension) as the Locally Preferred Alternative (LPA). As part of the LPA selection, the Metro Board decided to continue to study both Westwood/UCLA station location options (On-Street and Off-Street).

A comparative study of the two proposed Westwood/UCLA station locations, including engineering, costs, urban design, and environmental impact considerations, was conducted during the Final EIS/EIR phase to expand on the studies conducted in preparation of the Draft EIS/EIR.

The Off-Street Station and tunnels would need to be deeper than the On-Street Station to clear the underside of foundations for a future hotel on Gayley Avenue, which makes the station and tunnels riskier and more expensive to construct, and requires more time for transit riders to travel between the platform and the station entrance. Additionally, the Westwood/UCLA Off-Street Station location would require approximately 13 additional permanent underground easements.
17-3

The On-Street Station location would provide at least one entrance at the corner of Wilshire and Westwood Boulevards. This entrance location would provide better access to bus connections along Westwood Boulevard and would be closer to the major office buildings and Westwood Village than the entrances for the Off-Street Station. Furthermore, one of the station entrance options for the On-Street Station is a split entrance between the north and south sides of Wilshire Boulevard, providing access to both sides of busy Wilshire Boulevard. However, the Westwood/UCLA On-Street Station option is also expected to have greater traffic impacts during construction due to in-street construction along Wilshire Boulevard.

Based on these factors, the recommendation is to locate the Westwood/UCLA Station On-Street as this location could accommodate an entrance at the Wilshire Boulevard and Westwood Boulevard intersection, providing better pedestrian access to Westwood Village and connections along Westwood Boulevard.

Please refer to Section 8.8.6 of the Final EIS/EIR for more detailed responses to concerns related to the Westwood/UCLA Station. Please refer to Sections 2.3, 2.4, and 2.5 of the Final EIS/EIR for an overview of the development of alternatives, including station locations, and the LPA selection process. The Westside Subway Extension Alternatives Screening and Refinement Following Scoping Report provides a more detailed description of the refinements to the Westwood/UCLA Station following Draft EIS/EIR scoping in response to community comments and engineering requirements. 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/UCLA locations. In addition, the Westside Subway Extension Station Entrance Location Report and Recommendations provides a comparison of the potential entrance locations at Westwood Boulevard, Gayley Avenue and Veteran Avenue for both the On-Street and Off-Street Stations. All reports are available on the Metro Westside Subway Extension Project website: www.metro.net/projects/westside/westside-reports.

17-4

Your comment supporting the East location for the Wilshire/Fairfax Station has been noted. On October 28, 2010, the Metro Board of Directors identified Alternative 2 (Westwood/VA Hospital Extension) as the Locally Preferred Alternative, which includes the Wilshire/Fairfax East Station location due to stronger community support and better access and land integration opportunities, including proximity to Museum Row.

Please refer to Sections 2.3, 2.4, and 2.5 of the Final EIS/EIR for an overview of the development of alternatives, including station locations, and the LPA selection process. The Westside Subway Extension Alternatives Screening and Refinement Following Scoping Report provides a more detailed description of the refinements to the
17-4
Wilshire/Fairfax Station following Draft EIS/EIR scoping in response to community comments and engineering requirements. This report is available on the Metro Westside Subway Extension Project website: www.metro.net/projects/westside/westside-reports.

17-5
Your preference for the East location for the Wilshire/La Cienega Station has been noted. On October 28, 2010, the Metro Board of Directors identified Alternative 2 (Westwood/VA Hospital Extension) as the Locally Preferred Alternative (LPA). At Wilshire/La Cienega, the Board selected the East Station location without a West Hollywood connection structure as part of the LPA. This is the preferred station entrance location for the City of Beverly Hills because it will be located in a denser, more commercial area than the other station location to the west of La Cienega. This entrance location also will provide excellent connections to two major north-south arterials - La Cienega and San Vicente Boulevards.

Your preference for the inclusion of the West Hollywood connection structure has been noted. The Board chose not to include a West Hollywood connection structure in the LPA due to funding constraints.

Additionally, the cost of the connection structure is not sufficiently justified when there may be alternative, less costly solutions to serve the West Hollywood transit market, such as a light rail line. The Draft EIS/EIR showed that there is a market for transit improvements serving West Hollywood, and this corridor is included in the Strategic Element of the 2009 Long Range Transportation Plan. Should funding be identified and secured, further study could be done to identify a project that would be competitive under Federal funding criteria.

Please refer to Sections 2.3, 2.4, and 2.5 of the Final EIS/EIR for an overview of the development of alternatives, including station locations, and the LPA selection process. The Westside Subway Extension Alternatives Screening and Refinement Following Scoping Report provides a more detailed description of the refinements to the Wilshire/La Cienega Station, including the potential connection structure, following Draft EIS/EIR scoping in response to community comments and engineering requirements. This report is available on the Metro Westside Subway Extension Project website: www.metro.net/projects/westside/westside-reports.

17-6
The number of entrances at each station was based on the ridership projections for that station. Based on these projections, Metro will construct one station entrance at each of the proposed stations, with the exception of two station entrances at the Westwood/UCLA Station due to high ridership projections.
Your comment on the Wilshire/Crenshaw Station has been noted. In October 2010, the
Metro Board of Directors identified Alternative 2 (Westwood/VA Extension) as the Locally
Preferred Alternative (LPA). A Wilshire/Crenshaw Station was not included in the LPA.

The Wilshire/Crenshaw Station would be located in the Park Mile section of Wilshire
Boulevard, adjacent to lower density land uses that are not planned for future growth in the
adopted Community Plan and Park Mile Specific Plan. This site is only 0.5 mile from the
existing Wilshire/Western Station and does not serve a major north south intersection, as
Crenshaw Boulevard terminates at Wilshire Boulevard and does not extend to the north.
Because this is a comparatively lower ridership station with a cost of $153 million,
eliminating this station from the LPA improves the cost-effectiveness of Alternative 2.
Furthermore, future connections from the Westside subway stations along Wilshire
Boulevard to the planned Crenshaw/LAX Light Rail Transit project to the south have been
recommended to take place at La Brea, La Cienega, or San Vicente rather than at
Wilshire/Crenshaw.

Please refer to Sections 2.3, 2.4, and 2.5 of the Final EIS/EIR for an overview of the
development of alternatives, including station locations, and the LPA selection process.
The Westside Subway Extension Alternatives Screening and Refinement Following
Scoping Report provides a more detailed description of the refinements to the
Wilshire/Crenshaw Station following Draft EIS/EIR scoping in response to community
comments and engineering requirements. This report is available on the Metro Westside
Your preference for a modified Westwood/VA Hospital Station location has been noted.

During the Draft EIS/EIR scoping, the public suggested that an additional station should be provided west of I-405 because of the large distance between a Westwood/UCLA and a Wilshire/Bundy Station, as well as a desire to serve communities west of the I-405 more effectively. In response, five proposed stations west of I-405 were studied—two at Westwood/VA Hospital (one north of Wilshire and one south of Wilshire), Wilshire/Federal, Wilshire/Barrington, and Wilshire/Bundy. In analyzing the proposed stations, the potential to serve as a terminus station was an important consideration. In addition, all of the stations except for the stations at Westwood/VA Hospital are located too far west to be funded as part of Measure R and beyond the adopted LRTP.

The Wilshire/Federal Station would have been located on a site currently used by the U.S. Army Reserve, and the site was determined to be too small to accommodate the subway station without impacting adjacent historic homes in the VA property. From an engineering perspective, this also would have been a challenging site to construct a subway station because of the sharp curve of Wilshire Boulevard. Therefore, the Wilshire/Federal Station was eliminated from further consideration.

The Wilshire/Barrington Station would be located slightly west of the proposed Wilshire/Federal Station. While the Wilshire/Barrington Station is in a high density area with high ridership potential, comments were received from the community during scoping in opposition to locating a terminus station at Wilshire/Barrington due to traffic congestion and dense development concerns. Furthermore, the Wilshire/Barrington Station was not as evenly spaced between the Westwood/UCLA Station and the Wilshire/Bundy Station as is the Westwood/VA Hospital Station.

The Wilshire/Bundy Station is the farthest west of the terminus station considered and provided better potential transit connections as it aligns with the future planned Expo station at Olympic/Bundy. However, it is beyond Measure R funding.

Based on all of these considerations, and especially the fact that only the Westwood/VA Hospital Station is fundable within Measure R, the Wilshire/Federal, Wilshire/Barrington, and Wilshire/Bundy Stations were eliminated as potential terminus stations for the fundable Measure R alternatives. Both the North and South Options at the Westwood/VA Hospital Station were carried forward for further analysis in the Draft EIS/EIR. The Wilshire/Bundy Station was also carried forward into the Draft EIS/EIR as part of the Santa Monica Extension, which is beyond available Measure R funding, and would not serve as a terminus station.

Please refer to Section 8.8.5 of the Final EIS/EIR for more detailed responses to concerns related to the Westwood/VA Hospital Station and to Sections 2.3, 2.4, and 2.5 of the Final
168-1
EIS/EIR for an overview of the development of alternatives, including station locations, and the LPA selection process. The Westside Subway Extension Alternatives Screening and Refinement Following Scoping Report provides a more detailed description of the refinements to the Westwood/VA Hospital Station following Draft EIS/EIR scoping in response to community comments and engineering requirements. 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 Station locations in the Final EIS/EIR. All reports are available on the Metro Westside Subway Extension Project website: www.metro.net/projects/westside/westside-reports.

168-2
Your preference for the On-Street location of the Westwood/ UCLA Station has been noted. On October 28, 2010, the Metro Board of Directors identified Alternative 2 (Westwood/VA Hospital Extension) as the Locally Preferred Alternative (LPA). As part of the LPA selection, the Metro Board decided to continue to study both Westwood/UCLA station location options (On-Street and Off-Street).

A comparative study of the two proposed Westwood/UCLA station locations, including engineering, costs, urban design, and environmental impact considerations, was conducted during the Final EIS/EIR phase to expand on the studies conducted in preparation of the Draft EIS/EIR.

The Off-Street Station and tunnels would need to be deeper than the On-Street Station to clear the underside of foundations for a future hotel on Gayley Avenue, which makes the station and tunnels riskier and more expensive to construct, and requires more time for transit riders to travel between the platform and the station entrance. Additionally, the Westwood/UCLA Off-Street Station location would require approximately 13 additional permanent underground easements.

The On-Street Station location would provide at least one entrance at the corner of Wilshire and Westwood Boulevards. This entrance location would provide better access to bus connections along Westwood Boulevard and would be closer to the major office buildings and Westwood Village than the entrances for the Off-Street Station. Furthermore, one of the station entrance options for the On-Street Station is a split entrance between the north and south sides of Wilshire Boulevard, providing access to both sides of busy Wilshire Boulevard. However, the Westwood/UCLA On-Street Station option is also expected to have greater traffic impacts during construction due to in-street construction along Wilshire Boulevard.

Based on these factors, the recommendation is to locate the Westwood/UCLA Station On-Street as this location could accommodate an entrance at the Wilshire Boulevard and
168-2
Westwood Boulevard intersection, providing better pedestrian access to Westwood Village and connections along Westwood Boulevard.

Please refer to Section 8.8.6 of the Final EIS/EIR for more detailed responses to concerns related to the Westwood/UCLA Station. Please refer to Sections 2.3, 2.4, and 2.5 of the Final EIS/EIR for an overview of the development of alternatives, including station locations, and the LPA selection process. The Westside Subway Extension Alternatives Screening and Refinement Following Scoping Report provides a more detailed description of the refinements to the Westwood/UCLA Station following Draft EIS/EIR scoping in response to community comments and engineering requirements. 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/UCLA locations. In addition, the Westside Subway Extension Station Entrance Location Report and Recommendations provides a comparison of the potential entrance locations at Westwood Boulevard, Gayley Avenue and Veteran Avenue for both the On-Street and Off-Street Stations. All reports are available on the Metro Westside Subway Extension Project website: www.metro.net/projects/westside/westside-reports.

168-3
Your comment in support of the Century City Constellation Station has been noted. On October 28, 2010, the Metro Board of Directors identified Alternative 2 (Westwood/VA Hospital Extension) as the Locally Preferred Alternative (LPA). As part of the LPA selection, the Metro Board of Directors decided to continue to study both station location options in Century City (Santa Monica Boulevard and Constellation Boulevard) to address concerns raised by the community regarding locating a station directly on a seismic fault and the safety of tunneling under homes and schools.

In response to the Metro Board of Director’s request for more information, further analysis was undertaken to focus on the engineering and environmental aspects of the two options during the preparation of the Final EIS/EIR to expand on the studies conducted in preparation of the Draft EIS/EIR. It should be noted that prior to conducting the comparative study, the Santa Monica Boulevard Station location was shifted slightly to the east from the location in the Draft EIS/EIR to avoid the Santa Monica Fault zone.

The geotechnical studies conducted during preparation of the Final EIS/EIR concluded that tunneling can be safely carried out beneath the Beverly Hills High School campus and the West Beverly Hills, Century City, and Westwood neighborhoods. However, these studies also determined that the Century City Santa Monica Station would cross the West Beverly Hills Lineament, a northern extension of the active Newport-Inglewood Fault, which poses a significant safety risk to passengers at this station location. No evidence of faulting was found at the proposed Century City Constellation Station site.
In addition, the Century City Constellation Boulevard Station has the best pedestrian environment, can be expected to attract the most transit riders, and is centrally located to help shape the redevelopment of Century City as an important transit-oriented destination on the Westside Subway Extension. Further refinements to the ridership analysis concluded that the Century City Constellation Station would result in 3,350 more boardings along new Westside Subway Extension stations than the Century City Santa Monica Station due to proximity to jobs and residences within the critical 600-foot and 1/4-mile walksheds.

Based on all of these factors, the Century City Station Location Report concluded by recommending that the Century City Station be located along Constellation Boulevard due to seismic safety concerns at the Santa Monica Boulevard Station and higher ridership projections with Constellation Boulevard Station.

Please refer to Section 8.8.2 and 8.8.3 of the Final EIS/EIR for more detailed responses to concerns related to the Century City Station. Refer to Section 7.3 of the Final EIS/EIR and the Westside Subway Extension Century City Station Location Report for a comparison of the two Century City Station locations. The results of further geotechnical investigations in the Century City vicinity can be found in the Westside Subway Extension Century City Area Fault Investigation Report and the Westside Subway Extension Century City Area Tunneling Safety Report. The results of further ridership studies can be found in the Westside Subway Extension Technical Report Summarizing the Results of the Forecasted Alternatives and the Westside Subway Extension Century City TOD and Walk Access Study. All reports are available on the Metro Westside Subway Extension Project website: www.metro.net/projects/westside/westside-reports.

Your comment on future transit connections to the Crenshaw/LAX Line has been noted. In November 2009, the Metro Board voted to approve the Locally Preferred Alternative (LPA) for the Crenshaw/LAX Transit Corridor. The Crenshaw/LAX LPA includes an 8.5-mile light-rail line that would connect the Metro Green Line and the Expo Line along Crenshaw Boulevard. The Crenshaw/LAX LPA would not connect the line to Wilshire Boulevard.

A potential connection to Wilshire Boulevard was studied in a May 2009 Metro feasibility report. Although beyond the available project funding, this report determined that a connection at Wilshire/La Brea instead of Wilshire/Crenshaw would be more cost-effective and more compatible with existing land uses. Please refer to the Crenshaw Transit Corridor Project: Final Feasibility Study – Wilshire/La Brea Light Rail Transit Extension, available on the Crenshaw Transit Corridor Project page on the Metro website.

Keeping these recommendations in mind, the Westside Subway Extension Project, if approved for implementation, will be designed so as not to preclude future northward
extensions of the Crenshaw/LAX line along La Brea, La Cienega, or San Vicente.
Your comment in support of the Century City Santa Monica Station and concerns about tunneling beneath homes and schools has been noted. On October 28, 2010, the Metro Board of Directors identified Alternative 2 (Westwood/VA Hospital Extension) as the Locally Preferred Alternative (LPA). As part of the LPA selection, the Metro Board of Directors decided to continue to study both station location options in Century City (Santa Monica Boulevard and Constellation Boulevard) to address concerns raised by the community regarding locating a station directly on a seismic fault and the safety of tunneling under homes and schools. The Metro Board of Directors also decided to not include the Constellation South alignment between the Wilshire/Rodeo and Century City Stations as part of the LPA, but to continue to study the Constellation North and the Santa Monica Boulevard alignments. The Constellation South alignment passed beneath more residential properties than the Constellation North or Santa Monica Boulevard alignments. In addition, the Metro Board of Directors decided to not include the West or Central alignments between Century City and Westwood/UCLA as part of the LPA, but to continue to study the East alignment because the East alignment is the most direct and least expensive route between the two stations.

Safety, both during construction and eventual operations, is one of Metro's highest priorities and is one of the key evaluation criteria in selection of the Locally Preferred Alternative (LPA). In response to the Metro Board of Director's request for more information, further analysis was undertaken to focus on the engineering and environmental aspects of the two options during the preparation of the Final EIS/EIR to expand on the studies conducted in preparation of the Draft EIS/EIR. It should be noted that prior to conducting the comparative study, the Santa Monica Boulevard Station location was shifted slightly to the east from the location in the Draft EIS/EIR to avoid the Santa Monica Fault zone.

On most transit tunnel projects, significant portions of the alignment are constructed adjacent to or beneath buildings. The LPA passes beneath homes and schools in these neighborhoods because the curve radius required for subway tunnels is much wider than that required at a typical surface street intersection. The current alignment minimizes tunneling under buildings to the east and west of both the Century City Stations. The station position on Constellation Boulevard requires the tunnel alignment to be under the south portion of Beverly Hills High School Building B in order to reach the station location. There is no reasonable tunnel alignment that does not pass under homes or structures within the Beverly Hills High School campus.

The geotechnical studies conducted during preparation of the Final EIS/EIR concluded that tunneling can be safely carried out beneath the Beverly Hills High School campus and the West Beverly Hills, Century City, and Westwood neighborhoods. The use of state-of-the-art pressurized closed-face TBMs for soft-ground tunneling has greatly improved the control of ground movements such that tunneling can be done with minimal surface settlements. The presence of the tunnels will neither affect the risk to buildings above them during an...
earthquake nor change the severity of shaking. Finally, tunnels can be constructed and operated safely in gassy grounds and oil wells do not pose an unmitigable risk to tunneling.

The additional detailed geotechnical studies also assessed soil conditions and determine the potential for noise or vibration impacts on the surface along the refined alignments. These studies concluded that the predicted vibration and noise levels are within the FTA requirements and operation of the subway is not anticipated to have adverse impacts with the implementation of mitigation, including areas where the tunnels pass beneath homes and schools. During construction, low levels of noise and vibration may be experienced for a day or two as each of the two TBMs pass under a given location. In addition, as the tunnels are driven, construction trains bring supplies to and from the tunnel heading. However, these underground construction noises will also be controlled to be within Metro criteria.

The Westside Subway Extension will not reduce the availability of BHHS for use as an emergency shelter or impact the operations of its use as an emergency shelter. Furthermore, tunneling would not prevent future development of the BHHS campus. The vertical alignment of the tunnel would be 55 to 70 feet below the ground surface (to the top of the tunnel), which would allow for construction of an underground structure over the tunnel at a later date.

These geotechnical studies also determined that the Century City Santa Monica Station would cross the West Beverly Hills Lineament, a northern extension of the active Newport-Inglewood Fault, which poses a significant safety risk to passengers at this station location. No evidence of faulting was found at the proposed Century City Constellation Station site. Tunnels to the east and west of Century City pass through at least two active faults. However, there are numerous tools, designs, and construction means and methods that have been used elsewhere that can be used to safely tunnel through these fault zones.

In addition, the Century City Constellation Boulevard Station has the best pedestrian environment, can be expected to attract the most transit riders, and is centrally located to help shape the redevelopment of Century City as an important transit-oriented destination on the Westside Subway Extension. Further refinements to the ridership analysis concluded that the Century City Constellation Station would result in 3,350 more boardings along new Westside Subway Extension stations than the Century City Santa Monica Station due to proximity to jobs and residences within the critical 600-foot and 1/4-mile walksheds.

Based on all of these factors, the Century City Station Location Report concluded by recommending that the Century City Station be located along Constellation Boulevard due to seismic safety concerns at the Santa Monica Boulevard Station and higher ridership.
projections with Constellation Boulevard Station.

Please refer to Section 8.8.2 and 8.8.3 of the Final EIS/EIR for more detailed responses to concerns related to the Century City Station and alignments and Section 8.8.4 of the Final EIS/EIR for a more detailed response to geotechnical concerns. Refer to Section 7.3 of the Final EIS/EIR and the Westside Subway Extension Century City Station Location Report for a comparison of the two Century City Station locations. The results of further geotechnical investigations in the Century City vicinity can be found in the Westside Subway Extension Century City Area Fault Investigation Report and the Westside Subway Extension Century City Area Tunneling Safety Report. The results of further ridership studies can be found in the Westside Subway Extension Technical Report Summarizing the Results of the Forecasted Alternatives and the Westside Subway Extension Century City TOD and Walk Access Study. All reports are available on the Metro Westside Subway Extension Project website: www.metro.net/projects/westside/westside-reports.
Your comment in support of the Westside Subway Extension and Century City Constellation Station has been noted. On October 28, 2010, the Metro Board of Directors identified Alternative 2 (Westwood/VA Hospital Extension) as the Locally Preferred Alternative (LPA). As part of the LPA selection, the Metro Board of Directors decided to continue to study both station location options in Century City (Santa Monica Boulevard and Constellation Boulevard) to address concerns raised by the community regarding locating a station directly on a seismic fault and the safety of tunneling under homes and schools.

In response to the Metro Board of Director's request for more information, further analysis was undertaken to focus on the engineering and environmental aspects of the two options during the preparation of the Final EIS/EIR to expand on the studies conducted in preparation of the Draft EIS/EIR. It should be noted that prior to conducting the comparative study, the Santa Monica Boulevard Station location was shifted slightly to the east from the location in the Draft EIS/EIR to avoid the Santa Monica Fault zone.

The geotechnical studies conducted during preparation of the Final EIS/EIR concluded that tunneling can be safely carried out beneath the Beverly Hills High School campus and the West Beverly Hills, Century City, and Westwood neighborhoods. However, these studies also determined that the Century City Santa Monica Station would cross the West Beverly Hills Lineament, a northern extension of the active Newport-Inglewood Fault, which poses a significant safety risk to passengers at this station location. No evidence of faulting was found at the proposed Century City Constellation Station site.

In addition, the Century City Constellation Boulevard Station has the best pedestrian environment, can be expected to attract the most transit riders, and is centrally located to help shape the redevelopment of Century City as an important transit-oriented destination on the Westside Subway Extension. Further refinements to the ridership analysis concluded that the Century City Constellation Station would result in 3,350 more boardings along new Westside Subway Extension stations than the Century City Santa Monica Station due to proximity to jobs and residences within the critical 600-foot and 1/4-mile walksheds.

Based on all of these factors, the Century City Station Location Report concluded by recommending that the Century City Station be located along Constellation Boulevard due to seismic safety concerns at the Santa Monica Boulevard Station and higher ridership projections with Constellation Boulevard Station.

Please refer to Section 8.8.2 and 8.8.3 of the Final EIS/EIR for more detailed responses to concerns related to the Century City Station. Refer to Section 7.3 of the Final EIS/EIR and the Westside Subway Extension Century City Station Location Report for a comparison of the two Century City Station locations. The results of further geotechnical investigations in
the Century City vicinity can be found in the Westside Subway Extension Century City Area Fault Investigation Report and the Westside Subway Extension Century City Area Tunneling Safety Report. The results of further ridership studies can be found in the Westside Subway Extension Technical Report Summarizing the Results of the Forecasted Alternatives and the Westside Subway Extension Century City TOD and Walk Access Study. All reports are available on the Metro Westside Subway Extension Project website: www.metro.net/projects/westside/westside-reports.
From: glaucousmc@yahoo.com
To: Westside Extension
CC:
Subject: RE: Westside subway extension

Question:

1) The extension to the line going down olympic blvd on the westside/santa monica - what is that project/line referred to as? Blue line? purple line?????

2) The extension going down olympic - where is the current status? Is it already approved? Is it part of the purple line expansion EIR? I did not see the route down olympic addressed in the EIR report nor the chooing of those stations.

3) The extension going down olympic - is this street level or subterranean?

Thank you for your timely response.
Your comment about alternative routes and technologies for the subway has been noted. Between 2007 and 2009, Metro conducted an Alternatives Analysis (AA) Study for the Westside Corridor. The AA Study considered the need for transit improvements in the corridor and evaluated various transit technologies and alignments. During Early Scoping meetings, Metro presented the public with technology options that included Heavy Rail Transit (HRT), Light Rail Transit (LRT), and Bus Rapid Transit (BRT). In response to comments received, Metro added monorail to those other technologies to be analyzed in the AA Study. As a result of these analyses, the Metro Board decided to carry five subway alternatives into the Draft EIS/EIR. An underground alignment was recommended because it has fewer land use, traffic, visual, historic, and noise impacts than an elevated alignment. This is due to the impacts an elevated alignment would have on adjacent buildings (some historic), visual quality, shadow, noise, land acquisitions and traffic, as well as the mitigations needed. The AA Study also identified HRT as the preferred mode for further study because it has the capacity to meet the anticipated ridership demand and would minimize the number of transfers.

Please refer to Section 2.3 of the Final EIS/EIR and the Westside Transit Corridor Alternatives Analysis Study, available on the Metro Westside Subway Extension Project website: www.metro.net/projects/westside/westside-reports.
Convenient and safe access by pedestrians and bicyclists will be an important element of the Westside Subway Extension Project. Sidewalks, bicycle lanes, and other facilities along the Project corridor support non-motorized access. To assess potential future access improvements to subway stations, Project design efforts included a study of circulation needs in each station area. The results of this study are available in the Westside Subway Extension Station Circulation Report and Section 3.7 of this Final EIS/EIR. This study provided important guidance on potential station features, including those specifically relating to pedestrian and bicycle access. Areas explored by the study included the following:

- Provision of bicycle facilities at stations
- Enhanced bus shelters and lighting
- Making crosswalks more visible with crosswalk treatments and advance stop bars, increasing safety for pedestrians transferring from buses or traveling to other destinations on foot
- Improving the transit and pedestrian environment with the addition of sidewalk treatments

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.

Section 3.7 of this Final EIS/EIR summarizes the findings of the Station Circulation Report and lists specific measures to be implemented at stations to improve pedestrian and bicycle access. These measures include the following:

- T-5 through T-8—Install Crossing Deterrents/Crossing Deterrents
- T-9—Provide consistency with General Plan Designation Sidewalk Width Adjacent to Metro-Controlled Parcels
- T-10—Provide consistency with General Plan Designation Sidewalk Width Coordination with Jurisdictions
- T-11—Provide High Visibility Crosswalk Treatments
- T-12—Meet Federal, State, and Local Standards for Crossing
- T-13—Meet Metro Rail Design Criteria Minimums for Bicycle Parking
- T-14—Study Bicycle Parking Demand and Footprint Configuration
- T-15—Determine Alternative Sites for Bicycle Parking

Metro is committed to working with local jurisdictions to improve the environment for pedestrians and bicyclists at all Project stations and will continue to assess and refine the needs of pedestrians and bicyclists as the Project progresses into Final Design.

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 pedestrian and bicycle networks. All reports are available on the Metro Westside Subway Extension Project website: www.metro.net/projects/westside/westside-reports.
Your preference for the TSM Alternative has been noted. On October 28, 2010, the Metro Board of Directors identified Alternative 2 (Westwood/VA Hospital Extension) as the Locally Preferred Alternative (LPA). Alternative 2 was selected as the LPA because the analysis in the Draft EIS/EIR demonstrated that the Build Alternatives would be more effective than the TSM Alternative in terms of enhancing mobility, serving development opportunities, and addressing other aspects of the Purpose and Need for the Project. Please refer to Chapter 7 of the Draft EIS/EIR and Section 2.5 of the Final EIS/EIR for information on this analysis.

Furthermore, the Project would not eliminate bus service along Wilshire Boulevard but rather would supplement it with rail. As explained in Chapter 2, Metro Local, Limited, Rapid, and Express bus service along Wilshire Boulevard will continue to operate in conjunction with the rail system, if approved and implemented. The Wilshire Boulevard Bus Rapid Transit project is also assumed to be in place. Maintenance of local bus service levels is an important component of the transit system serving the Westside Corridor. With the extension the Purple Line subway service to the Westwood/VA Hospital Station, it is estimated that one-third of demand would involve local bus access. Metro continues to seek to improve the region's transit needs and continually evaluates various transit corridors to achieve a more interconnected transportation system. To help guide design of subway stations, potential enhanced local bus service at stations was assessed and is discussed in Chapter 3 of the Final EIS/EIR.

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Furthermore, the Westside Subway Extension Project will increase transit options and improve mobility for residents across Los Angeles County, including low-income and minority residents who are transit-dependent. Transit service is meant to serve where the demand is greatest, and these areas are often within neighborhoods that have Environmental Justice (EJ) populations and communities of concern. Four of the seven stations are located in, or adjacent to the Environmental Justice populations identified in Section 4.2.6 of the Final EIS/EIR. Therefore, people living in EJ populations will have the same opportunity to access the transit and mobility improvements provided by the subway.

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Your preference for the East location for the Wilshire/La Cienega Station has been noted. On October 28, 2010, the Metro Board of Directors identified Alternative 2 (Westwood/VA Hospital Extension) as the Locally Preferred Alternative (LPA). At Wilshire/La Cienega, the Board selected the East Station location without a West Hollywood connection structure as part of the LPA. This is the preferred station entrance location for the City of Beverly Hills because it will be located in a denser, more commercial area than the other station location to the west of La Cienega. This entrance location also will provide excellent connections to two major north-south arterials - La Cienega and San Vicente Boulevards.

Your comment regarding the potential for property acquisition has been noted. With respect to construction staging areas; proposed staging areas were addressed as part of the Draft EIS/EIR in the Westside Subway Extension Real Estate and Acquisitions Technical Report, in Chapter 2 and Appendix C of the Draft EIS/EIR. These proposed areas were refined and/or eliminated from further consideration for staging during the preparation of the Final EIS/EIR. The staging areas under consideration for the LPA in the Final EIS/EIR are identified in the Westside Subway Extension Acquisitions and Displacement Supplemental Report, and Section 2.6 and Appendix C of the Final EIS/EIR.

It is important to note that several construction staging site alternatives are under consideration at a few station locations in this Final EIS/EIR. Selection of the construction staging site will consider where the station entrances could be co-located, environmental impacts, and cost, as well as other factors. The decision will be made by the Metro Board of Directors following circulation and public review of this Final EIS/EIR.

Please refer to Sections 2.3, 2.4, and 2.5 of the Final EIS/EIR for an overview of the development of alternatives, including station locations, and the LPA selection process. The Westside Subway Extension Alternatives Screening and Refinement Following Scoping Report provides a more detailed description of the refinements to the Wilshire/La Cienega Station following Draft EIS/EIR scoping in response to community comments and engineering requirements. This report is available on the Metro Westside Subway Extension Project website: www.metro.net/projects/westside/westside-reports.
Your preference for the TSM Alternative has been noted. On October 28, 2010, the Metro Board of Directors identified Alternative 2 (Westwood/VA Hospital Extension) as the Locally Preferred Alternative (LPA). Alternative 2 was selected as the LPA because in the Draft EIS/EIR, demonstrated that the Build Alternatives would be more effective than the TSM Alternative in terms of enhancing mobility, serving development opportunities, and addressing other aspects of the Purpose and Need for the Project. Please refer to Chapter 7 of the Draft EIS/EIR and Section 2.5 of the Final EIS/EIR for information on this analysis.

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Your comment in support of the Westside Subway Extension Project has been noted. On October 28, 2010, the Metro Board approved Alternative 2 (Westwood/VA Hospital Extension) as the Locally Preferred Alternative. Only Alternatives 1 and 2 are affordable within the adopted Long Range Transportation Plan, and between them, Alternative 2 provides higher ridership and improved cost effectiveness. Additionally, Alternative 2 serves the VA Hospital and other communities west of the I-405 more effectively.

Your comment about project schedule has been noted. In April 2010, the Metro Board of Directors adopted the America Fast Forward 30/10 Initiative that directs that the Westside Subway Extension Project to seek accelerated federal funding to deliver the Project in a single phase to Westwood. Based on this accelerated funding schedule, the parallel construction of portions of the alignment and stations would allow the entire LPA to be open and operational to the Westwood/VA Hospital Station in 2022 as a single phase.

In the event that accelerated federal funding cannot be secured, the LPA would be constructed in three sequential phases. The first phase to the Wilshire/La Cienega Station would open in 2020, the second phase to the Century City Station would open in 2026, and the final phase to the Westwood/VA Hospital Station would open in 2036. Refer to Chapter 2 of the Final EIS/EIR for further information.
Your preference for the TSM Alternative has been noted. On October 28, 2010, the Metro Board of Directors identified Alternative 2 (Westwood/VA Hospital Extension) as the Locally Preferred Alternative (LPA). Alternative 2 was selected as the LPA because the analysis in the Draft EIS/EIR demonstrated that the Build Alternatives would be more effective than the TSM Alternative in terms of enhancing mobility, serving development opportunities, and addressing other aspects of the Purpose and Need for the Project. Please refer to Chapter 7 of the Draft EIS/EIR and Section 2.5 of the Final EIS/EIR for information on this analysis.

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Appendix H - Response to Comments

Westside Subway Extension
Final Environmental Impact Statement/Environmental Impact Report

March 2012
Page H-6.1-393
beneficial economic impact to elderly and low-income communities. The Project would also allow easier access to major employment centers. Transit user benefits associated with the LPA are anticipated both along the Project corridor as well as across the region. The transit benefits associated with the LPA are further detailed in Section 3.4 of the Final EIS/EIR.
I cannot make it to tonight's meeting but would love to become more involved in making the Westside subway extension a reality. I live in Brentwood and work in Century City and find it outrageous that in this day and age I can’t take a subway to work or to downtown from where I live. New York City has had a subway from all its major metropolitan areas to the waterfronts since the 1910s. One hundred years later and Los Angeles still does not have a single subway to any of our local beaches. New York, San Francisco, Chicago, Boston, Moscow, Tokyo, Seoul and most major world cities all have intricate subway systems which can deliver passengers traffic free to any part of the city. Until Los Angeles has the same, it will always be one step behind in being considered one of America's and the world's greatest cities.

Your comment in support of the Westside Subway Extension Project has been noted. On October 28, 2010, the Metro Board approved Alternative 2 (Westwood/VA Hospital Extension) as the Locally Preferred Alternative. Only Alternatives 1 and 2 are affordable within the adopted Long Range Transportation Plan, and between them, Alternative 2 provides higher ridership and improved cost effectiveness. Additionally, Alternative 2 serves the VA Hospital and other communities west of the I-405 more effectively.

Additionally, updates on the Project can be found on the Metro Westside Subway Extension Project website: www.metro.net/projects/westside/.
Comment from
First Name: DAVID
Last Name: DESALVO
Email: daviddesalvo@owen-desalvo.com
Phone:
URL:
------------------------------------------------------------------------
THE SUBWAY MAP FOR ALT #1 IS NOT FUNCTIONING
------------------------------------------------------------------------
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October 15, 2010

Honorable Don Knabe, Chair
Los Angeles County Metropolitan Transportation Authority
One Gateway Plaza
Los Angeles, CA 90012-2952

Dear Chairman Knabe:

I, Elonita Diao, wholeheartedly support the Westside extension of the subway and continue to be a strong advocate for the creation of new public transit options for the community. We are encouraged by the progress Metro is making towards achieving this goal and want to contribute our comments to the Draft Environmental Review (DER) document now in circulation.

In order to serve this community with the most ridership, we believe that the Constellation Boulevard and Avenue of the Stars station alignment should be adopted for several reasons:

- It will bring passengers to the heart of Century City, providing both convenience to travelers, as well as increased ridership which will benefit everyone.
- With nearly 40,000 employees within Century City clustered around this intersection, they are more likely to use the subway for both commuting and for trips during the day if the portal is conveniently located.

Thank you for your attention to our views. We look forward to the subway reaching Century City at the corners of Constellation Boulevard and Avenue of the Stars.

Sincerely,

Elonita Diao
Vice President

Cc: Mayor Antonio Villaraigosa
City Hall
200 No. Spring Street
Los Angeles, CA 90012

Honorable Zev Yaroslavsky
L.A. County Supervisor
821 Kenneth Hahn Hall of Administration
500 W. Tempe Street
Los Angeles, CA 90012

Councilman Paul Koretz, Council District 5
City Hall
200 North Spring Street
Room 440
Los Angeles, CA 90012

Your comments in support of the Westside Subway Extension and the Century City Constellation Station have been noted. On October 28, 2010, the Metro Board of Directors identified Alternative 2 (Westwood/VA Hospital Extension) as the LocallyPreferred Alternative (LPA). As part of the LPA selection, the Metro Board of Directors decided to continue to study both station location options in Century City (Santa Monica Boulevard and Constellation Boulevard) to address concerns raised by the community regarding locating a station directly on a seismic fault and the safety of tunneling under homes and schools.

In response to the Metro Board of Director’s request for more information, further analysis was undertaken to focus on the engineering and environmental aspects of the two options during the preparation of the Final EIS/EIR to expand on the studies conducted in preparation of the Draft EIS/EIR. It should be noted that prior to conducting the comparative study, the Santa Monica Boulevard Station location was shifted slightly to the east from the location in the Draft EIS/EIR to avoid the Santa Monica Fault zone.

The geotechnical studies conducted during preparation of the Final EIS/EIR concluded that tunneling can be safely carried out beneath the Beverly Hills High School campus and the West Beverly Hills, Century City, and Westwood neighborhoods. However, these studies also determined that the Century City Santa Monica Station would cross the West Beverly Hills Lineament, a northern extension of the active Newport-Inglewood Fault, which poses a significant safety risk to passengers at this station location. No evidence of faulting was found at the proposed Century City Constellation Station site.

In addition, the Century City Constellation Boulevard Station has the best pedestrian environment, can be expected to attract the most transit riders, and is centrally located to help shape the redevelopment of Century City as an important transit-oriented destination on the Westside Subway Extension. Further refinements to the ridership analysis concluded that the Century City Constellation Station would result in 3,350 more boardings along new Westside Subway Extension stations than the Century City Santa Monica Station due to proximity to jobs and residences within the critical 600-foot and 1/4-mile walksheds.

Based on all of these factors, the Century City Station Location Report concluded by recommending that the Century City Station be located along Constellation Boulevard due to seismic safety concerns at the Santa Monica Boulevard Station and higher ridership projections with Constellation Boulevard Station.

Please refer to Section 8.8.2 and 8.8.3 of the Final EIS/EIR for more detailed responses to concerns related to the Century City Station. Refer to Section 7.3 of the Final EIS/EIR and the Westside Subway Extension Century City Station Location Report for a comparison of the two Century City Station locations. The results of further geotechnical investigations in
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In addition, the Century City Constellation Boulevard Station has the best pedestrian environment, can be expected to attract the most transit riders, and is centrally located to help shape the redevelopment of Century City as an important transit-oriented destination on the Westside Subway Extension. Further refinements to the ridership analysis concluded that the Century City Constellation Station would result in 3,350 more boardings along new Westside Subway Extension stations than the Century City Santa Monica Station due to proximity to jobs and residences within the critical 600-foot and 1/4-mile walksheds.

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Furthermore, the Project would not eliminate bus service along Wilshire Boulevard but rather would supplement it with rail. As explained in Chapter 2, Metro Local, Limited, Rapid, and Express bus service along Wilshire Boulevard will continue to operate in conjunction with the rail system, if approved and implemented. The Wilshire Boulevard Bus Rapid Transit project is also assumed to be in place. Maintenance of local bus service levels is an important component of the transit system serving the Westside Corridor. With the extension the Purple Line subway service to the Westwood/VA Hospital Station, it is estimated that one-third of demand would involve local bus access. Metro continues to seek to improve the region’s transit needs and continually evaluates various transit corridors to achieve a more interconnected transportation system. To help guide design of subway stations, potential enhanced local bus service at stations was assessed and is discussed in Chapter 3 of the Final EIS/EIR.

The Project will be funded primarily through a combination of Measure R local funds and Federal New Starts funds, with some other local, State, and Federal funds. Metro will continue to use a combination of local, State, and Federal funding sources to operate and maintain the system. In addition to these funding sources, Metro relies on fare revenues to fund about one-third of its operating costs. Bus operating funds will not be used to construct the Project, and no fare increases or service reductions are proposed to cover the Project’s costs. The selection of the TSM Alternative would not have resulted in lower fares. The Metro Board of Directors establishes fares. Currently, the Base Fare for each boarding is $1.50 and the Metro Day Pass is $5.00. A transfer is the same as the Base Fare - $1.50.

Furthermore, the Westside Subway Extension Project will increase transit options and improve mobility for residents across Los Angeles County, including low-income and minority residents who are transit-dependent. Transit service is meant to serve where the demand is greatest, and these areas are often within neighborhoods that have Environmental Justice (EJ) populations and communities of concern. Four of the seven stations are located in, or adjacent to the Environmental Justice populations identified in Section 4.2.6 of the Final EIS/EIR. Therefore, people living in EJ populations will have the same opportunity to access the transit and mobility improvements provided by the subway.

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. Transit user benefits associated with the LPA are anticipated both along the Project corridor as well as across the region. The transit benefits associated with the LPA are further detailed in Section 3.4 of the Final EIS/EIR.
I strongly favor the East alignment for the Century City to Westwood subway line as shown in Figure 4.23. This is the route that primarily runs along Wilshire Blvd. The Central line is not shorter and would affect the most apartments, condominiums, and single family homes compared to the East and West routes.

Thank you,
Kenneth Dorshkind
10708 Welworth Avenue

IMPORTANT WARNING: This email (and any attachments) is only intended for the use of the person or entity to which it is addressed, and may contain information that is privileged and confidential. You, the recipient, are obligated to maintain it in a safe, secure and confidential manner. Unauthorized redisclosure or failure to maintain confidentiality may subject you to federal and state penalties. If you are not the intended recipient, please immediately notify us by return email, and delete this message from your computer.

Your comment about the alignment between Century City and Westwood has been noted. The East Alignment was approved by the Metro Board to be carried forward as part of the Locally Preferred Alternative (LPA), and the Central and West Alignments were removed from further consideration as part of the LPA. The West Alignment is significantly longer than the other two, and would increase travel time between Century City and Westwood by more than two minutes. This, in turn, would lead to somewhat lower ridership and user benefits, and to fewer air quality and energy conservation benefits. The West Alignment Option would also increase capital costs by $122 to $142 million in comparison to the East Alignment Option. Between the Central and East Alignment Options, both have similar performance characteristics and costs. The East Alignment, however, passes under fewer private properties. Therefore, it was selected to be carried forward in the LPA into the Final EIS/EIR.

As part of the LPA selection, the Metro Board of Directors also requested that Metro staff fully explore the risks associated with tunneling in the West Beverly Hills to Westwood area. Safety, both during construction and eventual operations, is one of Metro’s highest priorities and is one of the key evaluation criteria in selection of the LPA. The resulting studies have been completed as part of the Final EIS/EIR and are presented in two separate reports: the Westside Subway Extension Century City Area Fault Investigation Report and the Westside Subway Extension Century City Area Tunneling Safety Report.

On most transit tunnel projects, significant portions of the alignment are constructed adjacent to or beneath buildings. The LPA passes beneath homes and schools in these neighborhoods because the curve radius required for subway tunnels is much wider than that required at a typical surface street intersection. The current alignment minimizes tunneling under buildings to the east and west of both the Century City Stations.

The geotechnical studies conducted during preparation of the Final EIS/EIR concluded that tunneling can be safely carried out beneath the Beverly Hills High School campus and the West Beverly Hills, Century City, and Westwood neighborhoods. The use of state-of-the-art pressurized closed-face TBMs for soft-ground tunneling has greatly improved the control of ground movements such that tunneling can be done with minimal surface settlements. The presence of the tunnels will neither affect the risk to buildings above them during an earthquake nor change the severity of shaking. Finally, tunnels can be constructed and operated safely in gassy grounds and oil wells do not pose an unmitigable risk to tunneling.

The additional detailed geotechnical studies also assessed soil conditions and determine the potential for noise or vibration impacts on the surface along the refined alignments. These studies concluded that the predicted vibration and noise levels are within the FTA requirements and operation of the subway is not anticipated to have adverse impacts with the implementation of mitigation, including areas where the tunnels pass beneath homes.
and schools. During construction, low levels of noise and vibration may be experienced for a day or two as each of the two TBM s pass under a given location. In addition, as the tunnels are driven, construction trains bring supplies to and from the tunnel heading. However, these underground construction noises will also be controlled to be within Metro criteria.

These geotechnical studies also determined that the Century City Santa Monica Station would cross the West Beverly Hills Lineament, a northern extension of the active Newport-Inglewood Fault, which poses a significant safety risk to passengers at this station location. No evidence of faulting was found at the proposed Century City Constellation Station site. Tunnels to the east and west of Century City pass through at least two active faults. However, there are numerous tools, designs, and construction means and methods that have been used elsewhere that can be used to safely tunnel through these fault zones.

Please refer to Section 8.8.3 of the Final EIS/EIR for a more detailed response to alignments and Section 8.8.4 of the Final EIS/EIR for a more detailed response to geotechnical concerns. Please refer to Sections 2.3, 2.4, and 2.5 of the Final EIS/EIR for an overview of the development of alternatives, including alignment locations, and the LPA selection process. The Westside Subway Extension Alternatives Screening and Refinement Following Scoping Report provides a more detailed description of the refinements to the alignment between Century City and Westwood following Draft EIS/EIR scoping in response to community comments and engineering requirements. The results of further geotechnical investigations in the Century City vicinity can be found in the Westside Subway Extension Century City Area Fault Investigation Report and the Westside Subway Extension Century City Area Tunneling Safety Report. All reports are available on the Metro Westside Subway Extension Project website: www.metro.net/projects/westside/westside-reports.
Your comments about the traffic congestion reduction related to the Project have been noted.

The Westside Extension Study Area contains some of the most congested arterial streets in the County. Any approach to resolving the significant traffic congestion in the County, and for purposes of this study of congestion in the Study Area, needs a multi-modal approach. While there are freeway, arterial, and bus improvement projects planned within the Study Area to address mobility, no one project alone can reduce the extraordinary levels of congestion in the Westside and each has trade-offs and environmental consequences in its implementation.

Chapter 1 of this Final EIS/EIR details the Purpose and Need of the Project. As described, a major purpose of the Westside Subway Extension is to improve transit speed and reliability for the Study Area and, in particular, to provide enhanced mobility that will not be affected by freeway and arterial congestion levels. The improved capacity, speed, and reliability that will result from the subway’s exclusive guideway, offer the best solution to improve travel times, generate the projected 29 percent increase in transit riders in the study area between 2006 and 2035 (from 286,200 to 370,500), and provide an environmentally sound transit alternative.

Given the future conditions of the freeways, arterials, and travel speeds, the Westside Subway Extension provides benefit. Significant increases in travel are expected in the future and no major new highways or arterial widenings are planned. Without the subway, traffic congestion will be worse in the future. The Westside Subway Extension Project will provide significant new capacity to accommodate increases in travel demand but it will not, by itself, be sufficient to significantly reduce surface traffic congestion on the Westside.

This Final EIS/EIR presents a detailed examination of the travel-demand projections for 2035, which provide further insights on potential impacts of the LPA, specifically in terms of reduced auto trips during the seven-hour peak period. It is recognized that the LPA will result in a relatively small percentage decrease in trips. But, under the LPA, approximately 12,000 auto trips occurring in the seven-hour peak period will be eliminated. In addition, the Project will provide a highly attractive and viable public transportation alternative for Westside residents, workers, and visitors; particularly in terms of travel times and reliability.

Please refer to Section 8.8.9 of the Final EIS/EIR for a more detailed response to traffic congestion reductions. Information on how the LPA would affect travel in the region and Study Area is presented in Section 3.4, Section 3.5 and Chapter 7 of the Final EIS/EIR. The Westside Subway Extension Technical Report Summarizing the Results of the Forecasted Alternatives provides a summary of the updated travel forecast results for the Final EIS/EIR. All reports are available on the Metro Westside Subway Extension Project website: www.metro.net/projects/westside/westside-reports.
Your comment has been noted. Metro staff was unable to find the referenced L.A. Times article.

Your comments about parking have been noted. Park-and-ride can be an important mode of access to transit. However, these facilities are usually located in low-density areas that lack local bus service feeding the stations. That is not the case with this Project. Therefore, none of the stations proposed as part of the Project will provide parking.

The provision of park-and-ride facilities would be inconsistent with the purpose and need of the Project. The Project Study Area is already very congested and Metro seeks to discourage people from driving to access the subway. Park-and-ride facilities also could lead to increased auto use and potentially result in traffic impacts at intersections.

The provision of park-and-ride facilities also would be inconsistent with both the existing built environment surrounding stations and efforts to encourage transit-oriented development. The Project corridor is very dense due to medium and high density commercial and residential development. The construction of park-and-ride facilities would consume space that could be put to more productive residential and commercial uses.

Any added park-and-ride facilities would have major implications on Project costs. The study area already has very high land costs and there is lack of available parcels for park-and-ride development. Due to land costs and scarcity, any parking would need to be in multi-story garages, resulting in substantially higher capital costs than current estimates.

Please refer to Section 8.8.8 of the Final EIS/EIR for more detailed responses to concerns related to parking. In addition, Section 3.6 of the Final EIS/EIR estimates the demand for parking at the stations and provides an analysis of potential spillover parking impacts to surrounding communities.

Your comment has been noted. Metro and other public transit systems across the US rely on various means of financial support to supplement fares.

Your comment regarding methane gas and other subsurface hazardous gases has been noted.

Safety, both during construction and eventual operations, is one of Metro’s highest priorities. It was also one of the key evaluation criteria during the Draft EIS/EIR, and has been further considered in the Final EIS/EIR phase. In 2005, an American Public...
Transportation Association Peer Review Panel determined that “It is possible to tunnel and operate a subway along the Wilshire Corridor safely.” This conclusion was reached given the newer technology now used for tunneling, including pressurized face tunnel boring machines.

Subsurface gas is present throughout much of the Los Angeles area and is often a factor in foundation design and construction of underground structures. While tunneling for transportation has special considerations, other projects have been constructed in subsurface gas zones within the Los Angeles region, including buildings with deep parking garages and basements, storm drains, sewer projects and other utility projects along the Wilshire Corridor. In addition, Metro has safely operated the existing Metro Red/Purple Line subway for over 15 years and has successfully constructed subway tunnels where subsurface gas has been present.

Methane and hydrogen sulfide are present in high concentrations along about a 1.1 mile stretch of the Westside Subway Extension alignment along Wilshire Boulevard from about Burnside Avenue on the east to about La Jolla Avenue on the west. However, the entire LPA alignment passes through an area characterized by oil and gas fields and is within the City’s Methane Zone. Therefore, the possibility of encountering gaseous subsurface conditions can be expected for any portion of the alignment, and hazardous subsurface gases pose a significant hazard for construction of the LPA.

During construction, the pressurized face tunnel boring machines isolate gas from workers and the public, while gassy soil and tar sands are handled and disposed of appropriately. Robust underground ventilation and gas monitoring systems provide additional warning and protection. In addition, the state of California’s division of Occupational Safety and Health (Cal/OSHA) maintains strict safety orders for tunneling where ground is classified as “Gassy” or “Potentially Gassy.” Safety measures include continuous monitoring of the environment, “spark-proof” equipment, and other means to reduce risks to workers and the surroundings. The following mitigation measures will be implemented during construction of the LPA to reduce risks related to the presence of hazardous subsurface gases:

- CON-51—Techniques to Lower the Risk of Exposure to Hydrogen Sulfide
- CON-52—Measures to Reduce Gas Inflows
- CON-53—Further Research on Oil Well Locations
- CON-54—Worker Safety for Gassy Tunnels

The design and operation for tunnels and stations will provide a redundant protection system against gas intrusion. This will include: physical barriers to keep gas out of the tunnels and stations; high volume ventilation systems to dilute gases to safe levels; gas detection and monitoring systems with alarms; emergency ventilation triggered by the gas detection systems; additional training of personnel to respond to alarms. The following mitigation measures will be implemented during operation of the LPA to minimize risks...
related to subsurface hazardous gases:

- GEO-5 – Hazardous Subsurface Gas Operations
- GEO-6—Hazardous Subsurface Gas Structural Design
- GEO-7 – Tunnel Advisory Panel Design Review

With implementation of these mitigation measures, risks associated with hazardous subsurface gases will be reduced to less than significant levels during both construction and operation of the LPA.

Please refer to Section 4.8 (operations) and Section 4.15 (construction) of the Final EIS/EIR for more detailed discussion of methane gas and other subsurface hazardous gases. The results of further geotechnical investigations conducted during the Final EIS/EIR can be found in the *Westside Subway Extension Century City Area Tunneling Safety Report*. All reports are available on the Metro Westside Subway Extension Project website: www.metro.net/projects/westside/westside-reports.
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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. Transit user benefits associated with the LPA are anticipated both along the Project corridor as well as across the region. The transit benefits associated with the LPA are further detailed in Section 3.4 of the Final EIS/EIR.
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The station at Santa Monica Blvd in Century City should be eliminated immediately. This a ridiculous location for a subway station. It should be at Constellation - this is a no brainer. Please choose Constellation!

48-1

Your comment in support of the Century City Constellation Station has been noted. On October 28, 2010, the Metro Board of Directors identified Alternative 2 (Westwood/VA Hospital Extension) as the Locally Preferred Alternative (LPA). As part of the LPA selection, the Metro Board of Directors decided to continue to study both station location options in Century City (Santa Monica Boulevard and Constellation Boulevard) to address concerns raised by the community regarding locating a station directly on a seismic fault and the safety of tunneling under homes and schools.

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To Whom It May Concern,

As an east- to west-side commuter, I am eager to learn about the work on this extension and its developments. I drive daily and consider my environmental impact as well as how I may be more efficient in my route. This extension is so vastly important in my view and represents a real opportunity for Los Angeles to further its cultural legacy in completing a thorough metroline system.

Alternate Route #5 in terms of the long haul, would generate the most positive affect on the city, its inhabitants and the efforts to further employ those in this county. An undertaking of this size will have its struggles to bear, but its economic impact will benefit many and create new opportunity for many. I believe in the 30/10 plan’s ability to be achieved and to generate the revenue that it would take to call the commencement and completion of Route #5 a worthwhile success.

Thank you all for your hard, hard work as well as the devotion to putting the thought into achieving this goal the best way possible for all of us living and working in this broadly intricate Los Angeles landscape.

Many thanks,

Nicholas Duran
(Historic Filipinotown Resident)
Luke Bailey
Silverlake resident

--
www.flickr.com/nicholasadamduran
www.modelmayhem.com/nickduran
Mr. David Mieger, AICP
Project Director and Deputy Executive Officer
Metro, 1 Gateway Plaza, MS 99/2/5
Los Angeles, CA 90012
Via: Email

Dear Mr. Mieger:

Introduction

Once more I write to you to comment on the latest Westside Extension Transit Corridor Study. Although I am a Director of the Comstock Hills Homeowners Association and a former Director of the Westwood Homeowners Association, my comments are my own and do not necessarily represent the position of either Association.

I wish to incorporate my previous letters of November 11, 2009 and May 7, 2009 and content included by reference in those previous letters, by reference.

In general I fully support the concept to build the Westside Extension to the Wilshire Subway. I have four areas of primary concern and my letter will address them and then attempt to draw conclusions and make recommendations based on them. My concerns are:

I. Seismic Hazards
II. Noise and Vibration
III. Route Selection and Neighborhoods
IV. Methods to Resolve Issues (by thinking outside the box)

Summary

I believe that a far better solution is readily available to solve the contentious issues which have arisen concerning the specific route selection in the Westside residential areas. Neighbors are being pitted against neighbors because each residential property owner fears that his or her property value will decrease by hundreds of thousands of dollars if noise from the operation of the subway is apparent within our homes. Given the impossibility of accurately predicting the actual sound levels before the fact, our concerns are valid.

Your comments in support of the Westside Subway Extension Project have been noted.

Please see responses below on your areas of primary concern. It should be noted that the majority of the alignment for the subway extension would traverse under street rights-of-way. There are areas where the curve radius for a turn necessitates traversing under private property. Metro has tried to minimize traversing under residential properties, as well as minimizing potential impacts to any one particular neighborhood.

With regards to the location of the Santa Monica fault, during the Final EIS/EIR phase, Metro conducted further geotechnical studies to supplement the studies conducted during the Draft EIS/EIR, which concluded that both the Santa Monica fault zone and the WBHL in the Century City vicinity are active fault zones and each fault zone is capable of generating earthquakes of M7 or greater with average surface displacements of 3 to 6 feet. Moreover, there is no knowledge of where either of these faults resides in their respective seismic cycles. Please refer to Section 4.8 and Section 4.15 of the Final EIS/EIR for more detailed discussion of seismic safety both during operation and construction. The results of further geotechnical investigations conducted during the Final EIS/EIR can be found in the Westside Subway Extension Century City Area Fault Investigation Report and the Westside Subway Extension Century City Area Tunneling Safety Report. All reports are available on the Metro Westside Subway Extension Project website: www.metro.net/projects/westside/westside-reports.

Your comments regarding seismic and noise issues, and the route alignments have been noted. Please see expanded responses to your specific comments below.
I. Seismic Hazards

I believe that Constellation Boulevard is the best location for the Century City station but not because there is a seismic hazard as claimed. Because it speaks to the validity of the EIR as a whole, I take issue with the methodology and conclusions drawn from the cited references that there is a seismic hazard advantage to location of the Century City Station on Constellation Boulevard rather than on Santa Monica Boulevard. I find fault with the selective citation of the Dolan reports of 2000 as justification for this choice. Here are the findings contained in 13-Geotechnical & Hazardous-Materials-Technical Report:

Section 3.2.6 Geologic and Seismic Hazards

Surface Fault Rupture

“Surface fault rupture is ground deformation that occurs along the surface trace of the causative fault during an earthquake. In most cases it is impractical from an economic and engineering perspective to design a structure to withstand serious damage under the stress of surface fault rupture. However, because surface faulting is generally confined to a relative narrow zone a few feet to a few tens of feet wide, avoidance is often a practical means of mitigating surface fault rupture hazards for most facilities. To help identify and reduce the hazard of surface fault rupture, the “Alquist-Priolo Earthquake Fault Zoning Act” (A-P Act) is a state law that regulates certain development projects near active faults. The purpose of the act is to prohibit the location of most structures intended for human occupancy across the trace of an active fault. The act requires that development permits for projects within an “Earthquake Fault Zones” be withheld until geologic investigations demonstrate that the sites are not threatened by surface displacement from future fault rupture. To be zoned under the Alquist-Priolo Fault Zoning Act, a fault must be considered active or both sufficiently active and well-defined1 (Hart and Bryant, 1997). The CGS defines an active fault as one that has had surface displacement within Holocene time (about the last 11,000 years), and sufficiently active fault as one that has evidence of Holocene surface displacement along one or more of its segments or branches (Hart and Bryant, 1997). The CGS considers a fault to be well defined if its trace is clearly detectable as a physical feature at or just below the ground surface.

Much or all of this contention could be removed if the subway route were to follow the public right of way in the Westside as it does in all other areas of the route. Deviation from the public right of way has been justified based on a potential seismic hazard, better ridership, a shorter, faster route and lower costs. In this letter I will analyze the seismic hazard issue, the accuracy of the noise and vibration predictions, discuss the alternative routes, and, finally, propose a new approach to the design which can simultaneously provide the better ridership, shorter, faster route and lower costs desired, all the while maintaining the route essentially in the public right of way. This approach will do away with much of the opposition caused by our concerns about damages to our properties.

Your comment under I. Seismic Hazards have been noted and are responded to below.

Your comments about the conclusions of Dolan on the Santa Monica fault have been noted. With regard to your statement about the Santa Monica fault being active, please note that the State of California identifies the Santa Monica faults as an active fault within the most recent geologic epoch (the Holocene era, which extends from about 11,000 years ago until the present). The State of California bases this conclusion on the scientific research conducted to date on the fault.

Under your “Conclusions,” you state that “However, on the previous page of his report Dolan contradicts this by saying, ‘the fault may no longer be active.’” It should be noted that this is a sentence on page 1575 of the paper, in the portion where Dolan is speaking of the postulated Santa Monica Mountains Blind Thrust fault (proposed by other authors), which is a different fault from the Santa Monica fault. Therefore, Dolan did not state anywhere in the paper that the Santa Monica fault may not be active.

On page 4 of your letter, you indicate “that the only justification for the seismic conclusions drawn in the EIR are based on these references” [by which you are referring to Dolan]. Please note that the most thorough research to-date on the Santa Monica fault were by Dolan et al, and are thus used as the primary source for scientific information about the fault. Nevertheless, extensive additional studies were conducted as part of the Final EIS/EIR evaluation of the subway to provide far more data on the Santa Monica fault in the vicinity of the Century City Station than has ever been performed before. The results of further geotechnical investigations conducted during the Final EIS/EIR can be found in the Westside Subway Extension Century City Area Fault Investigation Report and the Westside Subway Extension Century City Area Tunneling Safety Report.

On page 5 and top of page 6, you discuss Metro’s intention to conduct more seismic testing, and conclude that Metro should not make a decision until such testing is concluded. As indicated above and in your letter, in selecting the LPA in October 2010, Metro also directed staff to conduct such additional seismic analysis. The results of this analysis can be found in the Westside Subway Extension Century City Area Fault Investigation Report and the Westside Subway Extension Century City Area Tunneling Safety Report.

With regard to your statement that “whether the routing is under Santa Monica or Constellation makes very little difference as far as earthquake safety is concerned,” please note that hazards from an earthquake include fault rupture (cracking/fracturing of the ground where one side of the fault moves relative to the other), shaking, and other secondary effects. While the hazard due to shaking should be designed against, the hazard due to fault rupture is potentially much more severe, but is also much more limited in area, being confined to the specific zone of rupture.
You make reference to the frequency of the Santa Monica fault. It should be noted that the time between earthquakes on a fault is extremely variable—a fault with an average recurrence of 8,000 years could have earthquakes much less or more frequently. There are almost no faults in the world where the recurrence intervals have been determined with a high level of confidence. For planning purposes, the State of California and engineering/geology practice do not attempt to differentiate between faults that have had a long time since the last earthquake.

You indicate that "we are much more likely to be hit with an earthquake on the southern portion of the San Andreas Fault." While it is true that the San Andreas Fault can produce very strong, and more frequent earthquakes that could affect a very large area, probabilistic seismic hazard analyses (PSHA) that integrate the probabilities of earthquakes from all active and potentially active faults in the southern California area indicate that for a site in the Westwood/Century City area, the predominant shaking hazard comes from the Santa Monica/Hollywood faults and the Newport-Inglewood fault. PSHA-type analyses are the predominant basis of the design of structures for earthquake shaking in the California Building Code (CBC).

With regard to your point #3 on page 6, please note that once the zone of faulting was identified based on the studies conducted for the Final EIS/EIR, then the design of the station structure was performed by incorporating an appropriate clearance between the zone of faulting and the station. The identification of the location of the Santa Monica Fault Zone can be found in the Westside Subway Extension Century City Area Fault Investigation Report and the Westside Subway Extension Century City Area Tunneling Safety Report.

You indicate in point #4 that earthquake restrictions were not placed on high rise buildings in Century City nor were seismic isolators required for the City Hall retrofit. Seismic isolators are not required by law or code to be utilized on any structure in the United States. Buildings in Century City are designed in accordance with the Los Angeles Building Code, considering the shaking hazard (which increases as distance to a fault decreases), and considering the hazard due to fault rupture (the building code requires that structures not be constructed on an active fault in order to prevent damage due to fault rupture displacement), along with other secondary earthquake hazards.

Your final conclusion on page 7 of your letter indicates that a station location in Century City should not be based on the geological hazards information but on the basis of ridership and convenience. Given the information provided above, about some of the differences between the station locations, it is appropriate to partially base the selection of the station location on these potential hazards. The decision for any station location where Metro considered two options in the Final EIS/EIR was ultimately based on a multitude of
Namson (1994). In the extreme case, the fault may no longer be active. In either case the blind thrust fault appears to represent less of a seismic hazard than has been proposed (e.g., Davis et al., 1989; Davis and Namson, 1994; Dolan et al., 1995).

(Note: The bibliography at the end of 13 in the EIR cites four Dolan reports dating back to 1992. Because the EIR language and the Dolan language in this report are so similar, and only this one is specific to the Santa Monica Fault, I believe that this is the primary source. The last two were written in 2000 and the citation in the text is to Dolan (2000). However, it is significant that the only justification readily apparent for the seismic conclusions drawn in the EIR are based on these references.)


The geology of this area as described by Dolan is extremely complex. Clearly he is not certain. By contrast, the very recent seismic testing done by the MTA was intended to clarify this complexity. Here is a response from Jody Litvak to my request to see the results of these much later (2010) tests:

“Dear Mr. Edelsohn:

“Thank you for your patience and I apologize for our delay in responding to you.

“Seismic testing (P-wave reflection surveys) were performed along Century Park West & Warnall Avenue on January 12 & 13, and along Selby Avenue (both sides of Santa Monica Boulevard) on January 14 & 15. Further P-wave reflection surveys were performed on Selby north of Santa Monica Boulevard (February 15, 17 & 18), and along Century Park West (February 16).
Also, from June 3-10, sonic core borings were drilled on Warnall and Missouri Avenues.

“The information from this field work has been used to more precisely identify the location of the Santa Monica Fault in this area. That location is shown in the report. The field work however is also preliminary in nature. Data from that field work has not been published nor has a report been issued. More complete investigation will be needed before such a report is issued. The seismic testing work that has been conducted thus far will be used to inform and help shape the further testing and analysis that will be needed to produce such a report. This work will occur when the project moves into the Final EIS/EIR and Preliminary Engineering.

“I hope that helps.

“Regards,

“Jody

“Jody F. Litvak
“Metro, Regional Communications
“1 Gateway Plaza, 99-8-2
“Los Angeles, CA  90012
“LitvakJ@metro.net
“(213) 922-1240

Similarly, the Metro Programming and Planning Committee Report of October 20, 2010 states:

- **Option 4: Century City Station:** Both the Santa Monica Boulevard and Constellation Station Options are recommended to be carried forward for further study before a preferred station location is selected. The DEIS/EIR geotechnical studies determined that the station option at Santa Monica Boulevard/Avenue of the Stars would be located directly above a seismic fault. Because this fault had not been fully mapped in the past, extensive additional geotechnical borings and testing have been conducted as a part of the DEIS/EIR to better understand the characteristics of this fault. The analysis completed by the release date of the DEIS/EIR has not led to a conclusive recommendation regarding the feasibility of a station at this location. The Santa Monica/Avenue of the Stars Station has been strongly supported by the City of Beverly Hills. The Constellation Station Option is located away from the seismic fault and was supported by the majority of commentators in meetings held outside of Beverly Hills. It is, however, strongly opposed by Beverly Hills because the alignments between Beverly Hills and Century City would need to pass beneath the Southwest Beverly Hills Homeowners Association and Beverly Hills High School. Further analysis along the route of the Constellation Station Option is required to more specifically address the concerns of this community.
It is my belief that decisions affecting so many people should not be made until the results of the latest seismic testing are analyzed, understood, published, and subjected to review by independent geologists.

I also question the inference contained in Section 3.2.6 Geologic and Seismic Hazards. "However, because surface faulting is generally confined to a relative narrow zone a few feet to a few tens of feet wide, avoidance is often a practical means of mitigating surface fault rupture hazards for most facilities." This implies that moving the tunnel or station a few tens of feet to Constellation Boulevard will preclude damage in the hypothetical magnitude 7.0 earthquake.

Whether the routing is under Santa Monica or Constellation makes very little difference as far as earthquake safety is concerned.

1. The frequency of earthquakes on the Santa Monica Fault has been has been suggested by Dalton to be about 8,000 years. There is some evidence that the last one was about 3,000 years ago. We are not due for another 5,000 years. The Dalton report also suggests that the fault may now be dormant.

2. If I were worried about the SM fault, the first thing I would do is move out of West Los Angeles. This fault slopes down from Santa Monica Blvd. To the north at a 30 degree angle. It probably lies about 500 feet under my house. If it lets go with a 6 to 7 magnitude quake, my first concern will not be about the subway.

We are much more likely to be hit with an earthquake on the southern portion of the San Andreas Fault. Here the average frequency is 150 years or less. Computer simulations were recently shown on TV which indicated that the resultant shock waves would be deflected by the Santa Monica mountains to focus toward downtown. It will also reach us on the Westside.

3. If the Santa Monica fault erupts, it will matter very little if the route is on Santa Monica Blvd. or Constellation. The epicenter is much more likely to be under Sunset Blvd. or beyond because of the slope of the fault line and the depth at which it will likely rupture. Having the route 70 feet further south will not help. Further the scarp lines showing where the surface moved 3000 years ago also indicate a fairly wide north south area was involved. This is shown on the maps of the VA grounds in the Dalton reports.

4. Neither the City nor the County nor the State have placed earthquake restrictions on high rise buildings in Century City. The Westfield Tower and the Century Plaza Hotel Towers and the other high rise building planned and approved are in much greater danger from an earthquake than the subway. Yet they are not even required to have seismic isolators like the City Hall retrofit.
Therefore the citation of the potential earthquake hazards as justification for the Constellation boulevard location can be disregarded except as an example of the incomplete nature of the current EIR. The results of the latest seismic testing should be analyzed, understood, published, and subjected to review by independent geologists before decisions are made.

The case in favor of the Constellation location can be justified far better on the basis of ridership and convenience to the growing population of Century City. Use of the seismic arguments casts doubt on the entire EIR.

II. Noise and Vibration

The Final Noise and Vibration Technical Report goes to great lengths to convince the readers of the conclusions on page 6-2, that everything will be quiet.

“No operational noise and vibration impacts for any of the alternatives are anticipated and no mitigation beyond what is described above for ground-born noise would be required in accordance with CEQA.”

However, much of this is based on comparisons to the existing ambient noise as depicted in Table 4-2 Existing Noise Levels, on page 4-3. However, the locations used for noise measurements seem limited to locations and times where ambient noise levels are known to be high. For example, measurement site number 4, 1743 Club View Avenue, is described as follows:

“4.2.3.6 Century City (Santa Monica Blvd)

“Noise levels were measured for 24 hours at 1743 Club View Drive north of Santa Monica Boulevard (Figure 4-7). This is located behind the retail and office buildings that front the proposed station location. The first row land uses adjacent to the proposed station are retail and office buildings south of Santa Monica Boulevard. Los Angeles County Golf Club and retail stores are located north of the proposed station location. Single-family residential land uses are located behind the first row land uses to the north of Santa Monica Boulevard. South of the proposed station location, the land uses in retail and office space: An Ldn of 63 dBA and a peak noise hour Leq (h) of 65 dBA were measured at this location.

This location, and the measurement time of 4 PM, are hardly representative of a quiet residential single family neighborhood. This location is immediately adjacent to the bus stop and high traffic associated with the Century City portion of Santa Monica Boulevard at rush hour. Commuter traffic routinely uses Club View Drive as a short cut from Century City to the Valley in the afternoon rush hour.

Note that the measurements made at location 5, Veteran Avenue and Wilshire Boulevard, a section of Wilshire Boulevard noted as one of the busiest and most highly traveled streets in the nation, are 594-3

In your comments about noise and vibration (II. Noise and Vibration, pages 7-8 of 16 of your letter), you quote the conclusions on page 6-2 of the Noise and Vibration Technical Report: “No operational noise and vibration impacts for any of the alternatives are anticipated and no mitigation beyond what is described above for ground-born noise would be required in accordance with CEQA.”

This conclusion is meant to say that there are no anticipated operational noise and vibration impacts for any of the alternatives. The ground-born noise that is predicted to exceed the FTA criteria would be mitigated to a level of no significance under CEQA.

You also indicate on page 8 that the ambient noise measurement location and time of day these measurements were conducted is not representative of a quiet residential single family neighborhood as presented in Table 4-2. The noise measurements obtained at Site #6, Century City Station (Santa Monica Boulevard), was over a 24 hour period. The table notes that the highest hourly noise level occurred at 4 pm.

The 24-hour noise levels are used to assess potential impact from the operation of the underground transit system. The predominant source of noise at this location (Site #6) is the ventilation fans and trains operating in the subway tunnel generating noise to the surface through the vent shafts. In accordance with FTA guidelines, the noise measurement locations selected to assess potential impacts should be the closest receivers to the vent shaft, the source of noise. Other receiver locations that may be more characteristic of quieter residential areas were further from the vent shaft noise and were shielded by intervening buildings resulting in much lower expected noise levels than those predicted at Site #6.
only about 13 dB higher.

4.2.3.7 Westwood/UCLA Off-Street Station

Noise levels were measured for 24 hours at the Northeast corner of the intersection of Wilshire Boulevard and Veteran Avenue (Figure 4-8). The Los Angeles National Cemetery is located on the Northwest corner of Wilshire Boulevard and Veteran Avenue. All other land uses in the area are offices and retail stores. An L_{eq} of 74 dBA and a peak noise hour L_{pp} of 79 dBA were measured at this location.

Because of the logarithmic nature of the decibel scale, this is a sound power only about four times louder. Thus the use of the Club View location as a primary reference for comparison to projected noise and vibration levels deduced by simulation and calculation of anticipated sound propagation in the vicinity is doubly suspect. First the reference levels for comparison are biased well above true single family residential neighborhoods and, second, the method of calculation of anticipated noise and vibration levels through calculation and simulation is inherently unprovable.

The level of accuracy of the projections compared to normal residential sound levels should be verified and improved before any routes under residential areas are approved.

III. Route Selection and Neighborhoods

Presenting different neighborhoods with multiple choices as to routes is an invitation to divide neighborhoods on the basis of local marginal advantages and disadvantages. The currently ongoing arguments between neighborhoods over the choice of the Exposition light rail route is our most recent parallel example. This is especially true for neighborhoods with expensive land values where the presence of noise and vibration from a subway could potentially decrease land values for an individual home owner by hundreds of thousand of dollars. The fact that the subway route diverts from the public right of way only in the expensive Westside, including Beverly Hills, was a sure way to create problems. The MTA could not have picked a method more suited to creating dissension, accompanied by much heat and little light.

I have called this situation to your attention in several of the public meetings I have attended. As a Professional Engineer, Registered in the State of California. I have offered suggestions to overcome this issue by thinking outside the normal engineering box. Without a creative solution to this impasse, I fear that the Westside Extension will languish in the courts for decades. I will reiterate my suggestions in the next section.

IV. Methods to Resolve Issues (by thinking outside the box)

The fundamental suggestion I made, is that the track radius of curvature can be made tighter as the tracks near the stations with little to no loss of transit times because of the smaller radius of

594-4

Your comments regarding the division of neighborhoods in the planning process have been noted. In any type of large-scale public transportation project, there will inevitably be trade-offs and disadvantages of any project selected and approved. Metro has consistently worked with the communities in which it plans and ultimately builds projects, and in doing so, has been committed to listening to the public, modifying plans and designs to accommodate their concerns, and above all, keeping the public informed at all stages of project planning and development to ensure that they have the latest information and the opportunity to comment on that information.

Metro has conducted numerous community meetings in various parts of the Westside Corridor Study Area throughout the Alternatives Analysis, Draft EIS/EIR and Final EIS/EIR phases (as well as during study phases prior to these). Through these meetings, the feedback that is received from the community, and the technical work that is done, Metro strives to minimize the impact to any one particular neighborhood, as well as minimizing any potential conflict that might arise between neighborhoods. Metro strives through community outreach to disclose to all participants the extent of benefits as well as potential impacts to any neighborhood from that may result from a project. Ultimately, the decisions that are made regarding station locations and route alignment are comprised of a multitude of factors, not the least of which are public support, mobility improvement, cost-effectiveness, and environmental impacts.

Please refer to Sections 2.3, 2.4, and 2.5 of the Final EIS/EIR for an overview of the development of alternatives, including station locations, and the LPA selection process. Also refer to Chapter 7 of the Draft EIS/EIR which present a detailed discussion of the evaluation of alternatives and highlights the significant trade-offs to be made in selecting a Locally Preferred Alternative. The Westside Subway Extension Alternatives Screening and Refinement Following Scoping Report provides a more detailed description of the refinements to stations following Draft EIS/EIR scoping in response to community comments and engineering requirements. This report is available on the Metro Westside Subway Extension Project website: www.metro.net/projects/westside/westside-reports.

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Your comments regarding tunnel alignment and station design have been noted. The Westside Subway Extension tunnel alignment and stations have been designed and optimized to comply with current Metro Rail Design Criteria.

The Metro Rail Design Criteria - Section 4-Guideway and Trackwork provides guidelines for the alignment design, including track geometry. This section of the Metro Rail Design Criteria is based on requirements, established by California Public Utilities Commission (CPUC), recommendations of American Railway Engineering and Maintenance Association (AREMA) and other applicable Federal (i.e., ADA), State (i.e., PUC) and location
The trains have to slow down anyway. (There is no provision for double tracks for express trains.) A logarithmic spiral of decreasing radius is an example. The optimum rate of increase of curvature can be determined by parametric analysis of transit times as a function of rate of change of curvature using standard method of Operations Research for transportation systems. (I have done similar optimizations many times in my professional career.) If the radius of curvature is tightened near the stations, the total track length is reduced and the total cost is proportionately reduced.

For example, with a tighter radius of curvature near the stations, the transition from Wilshire to Santa Monica Boulevard can be accomplished without going under homes and schools while still using the Constellation Boulevard station. In fact, the optimum station design is probably a curved station on Constellation rather than the engineering box to which we have limited our thinking. The route through Beverly Hills can avoid homes and the High School and still maintain fast service. The route can make a wide sweeping turn from Wilshire and then make an increasingly tight turn into the Century City station and then an increasingly wider turn out of the station back to Santa Monica Boulevard.

Applying this same reasoning to the rest of the route, the tunnel can remain under the Santa Monica Boulevard right of way, avoiding the many other single family residences in the Comstock Hills and Westwood Homeowners Association areas. A wide, sweeping, and high speed turn is possible under the Westwood Boulevard - Santa Monica Boulevard intersection by an alignment under commercial properties far less sensitive to noise and vibration than single family residences.

In Westwood Village, the same principle of an increasingly tight turn as the train slows down can avoid the current design calling for wide sweeping, but unnecessary, high speed turns into the UCLA station. Again, total track length is reduced, cost is reduced, and transit time is not sacrificed. As in Century City, the optimum Village/UCLA station design is probably curved and not a typical rectangular box.

As in the PowerPoint presentation I made at a Beverly Hills outreach meeting (copy attached) I challenge you to think outside the box to find a creative solution which will simultaneously reduce track length, reduce cost, and maintain fast travel times.

Once again, I offer this advice to you based on my years of experience conducting cost benefit analyses for the Federal government as well as my experience in predicting and modeling performance of complex systems as a Professional Engineer. I offer these remarks in the spirit of cooperation toward a common goal. We need a Westside Heavy Rail Transportation System as quickly as possible but we also need to optimize our design and to consider rational, but out of the box alternatives, such as spirally curved tracks approaching stations and curved stations.

Efficiency of transit system is defined by its capacity, construction cost and system operational cost. To achieve the full capacity, the Metro Rail Design Criteria requires that the design shall provide for highest travel speed and shortest possible headways. Metro Rail Design Criteria requirements for guideway design are performance oriented and provide directions to achieve high travel speed combined with considerations for vehicle stability and vehicle/track maintenance. Metro Design Criteria recognizes that issues of capacity, construction and operational costs are interrelated and shall be addressed by designer on a case-by-case basis, using cost benefits analyses, under the Metro directions.

Provisions for safety of the transit system are included in Metro Rail Design Criteria requirements for track geometry and clearances to achieve safe movement of the trains and means for passenger evacuation, combined with considerations for minimal necessary width of the guideway.

Passenger comfort provisions are included in the Metro Rail Design Criteria requirements for guideway geometry, which are based on AREMA recommended accelerations and travel duration through geometry element.

With regards to your suggestions to incorporate tighter radius of curvature into the alignment design near stations, Section 4.1.6 of the Metro Rail Design Criteria provides guidance in designing track horizontal and vertical geometry, including curve radius. Current Metro Rail Design Criteria requires track alignment to be tangents at both ends of station platforms, which limits curvature of the alignment in the station vicinity. Curves beyond the tangents are further limited by operational requirements to maintain comfortable ride and operating speed to meet train schedule. Any further reduction in curve radius would result in uncomfortable ride or reduced safety conditions beyond allowable limits. In addition to current Metro Rail Design Criteria, the curve radius of the tunnel alignment is further limited by the turning radius of the Tunneled Boring Machine (TBM) during construction.

Your suggestions to incorporate curved platforms into station design have been noted. Although used in other cities, curved platforms have several limitations and are in violation of the current Metro Design Criteria. Curved platforms would create uneven and wide gaps between the train and platform, presenting a danger when riders enter and exit the train. Metro Rail Design Criteria (Section 4.1.6) stipulates that "special trackwork and passenger platforms shall be located on horizontal and vertical tangents." Metro Rail Design Criteria (Section 4.1.3) dictates the maximum allowable horizontal gap between the station platform and the vehicle floor at the door entrance. The maximum gap between platform and vehicle...
To this end, I also reiterate my offer to you to serve, without charge, as a Professional Engineering member of a Red Team Review Committee to guide the progress of this effort before final reports and recommendations are issued.

I hope my comments will be of value to you.

Sincerely yours,

Charles Edelsohn

Appendix - Power Point Presentation dated 28 June, 2010, titled, Wilshire Subway - Confidence, Engineering and Litigation

Copies: Supervisor Zev Yaroslavsky, Supervisor Don Knabe, Councilman Paul Koretz, Field Deputy Jay Greenstein, Field Deputy Eric Norton

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is dictated in part by ADA requirements. A curved platform and car door configuration would result in a widened gap that would exceed Metro Rail Design Criteria and would create a safety and liability problem. Additionally, curved station boxes and platforms are also more expensive to design and construct.
Confidence

You have lost our confidence

You said the vibration seismic testing in our neighborhoods would be no louder than a vacuum cleaner.

You said the drilling seismic testing would be even quieter.

You were wrong twice. Your outreach program was massive but the information was just wrong.

You need to rebuild our confidence by giving us better answers and better access to what is going on.

Charles Edelsohn  June 28, 2010

Your comment regarding the loudness of seismic testing has also been noted.

Highly specialized equipment was used for seismic surveys. Metro provided the public with the best information available regarding potential impacts prior to testing. However the equipment was used for the first time and therefore Metro relied on the specifications and literature from the equipment manufacturer. Metro apologizes if it was more disruptive than anticipated.

For information on field work related to the Project as well as a telephone number to call with questions and concerns please visit the Metro Westside Subway Extension Project website: www.metro.net/projects/westside/ and click on the Field Work tab.

The results of further geotechnical investigations conducted during the Final EIS/EIR can be found in the Westside Subway Extension Century City Area Fault Investigation Report and the Westside Subway Extension Century City Area Tunneling Safety Report. All reports are available on the Metro Westside Subway Extension Project website: www.metro.net/projects/westside/westside-reports.
We suggested that you include the Westwood Boulevard alignment in your study. You did but you used a serpentine route that was too long and impacted too many homes as it snaked, not along, but across Westwood Bl. The alignment you studied was doomed to rejection from the outset.

I ask you now to think outside the box. The big loop that costs so much money in the Village is to allow trains to travel a high speed around the turn. But the trains all slow down to stop in the Village. That means you can reduce the radius, reduce the track length, save money, and avoid the houses. In fact, if you use the single bore technique, you can curve the station itself, reduce the track length even more and save still more money.

Still outside the box, I ask you reconsider the station at Westwood and Santa Monica. If you include that station you slow and stop there also. Again you can reduce the size of the turn and you save even more track length. Would that saving plus the added ridership make the Santa Monica station cost effective?

Charles Edelsohn June 28, 2010
Litigation

Months ago I wrote you a letter pointing out the danger you expose the MTA and the County to by choosing a route under our homes in Westwood. I pointed out that your route through Westwood would pass under more political activists and lawyers than you can possibly imagine.

Now you are compounding your folly by routing another section under Beverly Hills activists and Beverly Hills lawyers.

Once more I urge you think outside the box. Consider a curved station in Century City also. Consider that a train stop in Century City also will require the trains to slow down. This make tighter turns, under fewer homes feasible in Beverly Hills also.

Charles Edelsohn June 28, 2010
Your preference for the TSM Alternative has been noted. On October 28, 2010, the Metro Board of Directors identified Alternative 2 (Westwood/VA Hospital Extension) as the Locally Preferred Alternative (LPA). Alternative 2 was selected as the LPA because the analysis in the Draft EIS/EIR demonstrated that the Build Alternatives would be more effective than the TSM Alternative in terms of enhancing mobility, serving development opportunities, and addressing other aspects of the Purpose and Need for the Project. Please refer to Chapter 7 of the Draft EIS/EIR and Section 2.5 of the Final EIS/EIR for information on this analysis.

Furthermore, the Project would not eliminate bus service along Wilshire Boulevard but rather would supplement it with rail. As explained in Chapter 2, Metro Local, Limited, Rapid, and Express bus service along Wilshire Boulevard will continue to operate in conjunction with the rail system, if approved and implemented. The Wilshire Boulevard Bus Rapid Transit project is also assumed to be in place. Maintenance of local bus service levels is an important component of the transit system serving the Westside Corridor. With the extension the Purple Line subway service to the Westwood/VA Hospital Station, it is estimated that one-third of demand would involve local bus access. Metro continues to seek to improve the region’s transit needs and continually evaluates various transit corridors to achieve a more interconnected transportation system. To help guide design of subway stations, potential enhanced local bus service at stations was assessed and is discussed in Chapter 3 of the Final EIS/EIR.

The Project will be funded primarily through a combination of Measure R local funds and Federal New Starts funds, with some other local, State, and Federal funds. Metro will continue to use a combination of local, State, and Federal funding sources to operate and maintain the system. In addition to these funding sources, Metro relies on fare revenues to fund about one-third of its operating costs. Bus operating funds will not be used to construct the Project, and no fare increases or service reductions are proposed to cover the Project’s costs. The selection of the TSM Alternative would not have resulted in lower fares. The Metro Board of Directors establishes fares. Currently, the Base Fare for each boarding is $1.50 and the Metro Day Pass is $5.00. A transfer is the same as the Base Fare - $1.50.

Furthermore, the Westside Subway Extension Project will increase transit options and improve mobility for residents across Los Angeles County, including low-income and minority residents who are transit-dependent. Transit service is meant to serve where the demand is greatest, and these areas are often within neighborhoods that have Environmental Justice (EJ) populations and communities of concern. Four of the seven stations are located in, or adjacent to the Environmental Justice populations identified in Section 4.2.6 of the Final EIS/EIR. Therefore, people living in EJ populations will have the same opportunity to access the transit and mobility improvements provided by the subway.

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. Transit user benefits associated with the LPA are anticipated both along the Project corridor as well as across the region. The transit benefits associated with the LPA are further detailed in Section 3.4 of the Final EIS/EIR.
Appendix H - Response to Comments

117-1
Your comment in support of the Westside Subway Extension Project has been noted. On October 28, 2010, the Metro Board of Directors identified Alternative 2 (Westwood/VA Hospital Extension) as the Locally Preferred Alternative. Only Alternatives 1 and 2 are affordable within the adopted Long Range Transportation Plan, and between them, Alternative 2 provides higher ridership and improved cost effectiveness. Additionally, Alternative 2 serves the VA Hospital and other communities west of the I-405 more effectively.

Please refer to Sections 2.3, 2.4, and 2.5 of the Final EIS/EIR for an overview of the development of alternatives and the LPA selection process.

117-2
Your preference for a modified Westwood/VA Hospital Station location has been noted.

During the Draft EIS/EIR scoping, the public suggested that an additional station should be provided west of I-405 because of the large distance between a Westwood/UCLA and a Wilshire/Bundy Station, as well as a desire to serve communities west of the I-405 more effectively. In response, five proposed stations west of I-405 were studied—two at Westwood/VA Hospital (one north of Wilshire and one south of Wilshire), Wilshire/Federal, Wilshire/Barrington, and Wilshire/Bundy. In analyzing the proposed stations, the potential to serve as a terminus station was an important consideration. In addition, all of the stations except for the stations at Westwood/VA Hospital are located too far west to be funded as part of Measure R and beyond the adopted LRTP.

The Wilshire/Federal Station would have been located on a site currently used by the U.S. Army Reserve, and the site was determined to be too small to accommodate the subway station without impacting adjacent historic homes in the VA property. From an engineering perspective, this also would have been a challenging site to construct a subway station because of the sharp curve of Wilshire Boulevard. Therefore, the Wilshire/Federal Station was eliminated from further consideration.

The Wilshire/Barrington Station would be located slightly west of the proposed Wilshire/Federal Station. While the Wilshire/Barrington Station is in a high density area with high ridership potential, comments were received from the community during scoping in opposition to locating a terminus station at Wilshire/Barrington due to traffic congestion and dense development concerns. Furthermore, the Wilshire/Barrington Station was not as evenly spaced between the Westwood/UCLA Station and the Wilshire/Bundy Station as is the Westwood/Federal Station.

The Wilshire/Bundy Station is the farthest west of the terminus station considered and provided better potential transit connections as it aligns with the future planned Expo station at Olympic/Bundy. However, it is beyond Measure R funding.
Based on all of these considerations, and especially the fact that only the Westwood/VA Hospital Station is fundable within Measure R, the Wilshire/Federal, Wilshire/Barrington, and Wilshire/Bundy Stations were eliminated as potential terminus stations for the fundable Measure R alternatives. Both the North and South Options at the Westwood/VA Hospital Station were carried forward for further analysis in the Draft EIS/EIR. The Wilshire/Bundy Station was also carried forward into the Draft EIS/EIR as part of the Santa Monica Extension, which is beyond available Measure R funding, and would not serve as a terminus station.

Please refer to Section 8.8.5 of the Final EIS/EIR for more detailed responses to concerns related to the Westwood/VA Hospital Station and to Sections 2.3, 2.4, and 2.5 of the Final EIS/EIR for an overview of the development of alternatives, including station locations, and the LPA selection process. The Westside Subway Extension Alternatives Screening and Refinement Following Scoping Report provides a more detailed description of the refinements to the Westwood/VA Hospital Station following Draft EIS/EIR scoping in response to community comments and engineering requirements. 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 Station locations in the Final EIS/EIR. All reports are available on the Metro Westside Subway Extension Project website: www.metro.net/projects/westside/westside-reports.

Your preference for the Off-Street location of the Westwood/UCLA Station has been noted. On October 28, 2010, the Metro Board of Directors identified Alternative 2 (Westwood/VA Hospital Extension) as the Locally Preferred Alternative (LPA). As part of the LPA selection, the Metro Board decided to continue to study both Westwood/UCLA station location options (On-Street and Off-Street).

A comparative study of the two proposed Westwood/UCLA station locations, including engineering, costs, urban design, and environmental impact considerations, was conducted during the Final EIS/EIR phase to expand on the studies conducted in preparation of the Draft EIS/EIR.

The Off-Street Station and tunnels would need to be deeper than the On-Street Station to clear the underside of foundations for a future hotel on Gayley Avenue, which makes the station and tunnels riskier and more expensive to construct, and requires more time for transit riders to travel between the platform and the station entrance. Additionally, the Westwood/UCLA Off-Street Station location would require approximately 13 additional permanent underground easements.
The On-Street Station location would provide at least one entrance at the corner of Wilshire and Westwood Boulevards. This entrance location would provide better access to bus connections along Westwood Boulevard and would be closer to the major office buildings and Westwood Village than the entrances for the Off-Street Station. Furthermore, one of the station entrance options for the On-Street Station is a split entrance between the north and south sides of Wilshire Boulevard, providing access to both sides of busy Wilshire Boulevard. However, the Westwood/UCLA On-Street Station option is also expected to have greater traffic impacts during construction due to in-street construction along Wilshire Boulevard.

Based on these factors, the recommendation is to locate the Westwood/UCLA Station On-Street as this location could accommodate an entrance at the Wilshire Boulevard and Westwood Boulevard intersection, providing better pedestrian access to Westwood Village and connections along Westwood Boulevard.

Your comment on future transit connections to a Sepulveda/I-405 line has been noted. The San Fernando Valley I-405 Corridor Connection is included in Metro's 2009 Long Range Transportation Plan and funding has been allocated in Measure R for the project. Metro will undertake planning studies for the corridor to identify the mode, alignment and appropriate connections to other area transit projects, including the Westside Subway Extension.

Your comment on developing transit connections between Project stations and the Expo Line stations has also been noted. The potential for future transit connections, including connections to the planned Expo Line, were considered when the location of Project stations was determined but are beyond the scope of this project.

Please refer to Section 8.8.6 of the Final EIS/EIR for more detailed responses to concerns related to the Westwood/UCLA Station. Please refer to Sections 2.3, 2.4, and 2.5 of the Final EIS/EIR for an overview of the development of alternatives, including station locations, and the LPA selection process. The Westside Subway Extension Alternatives Screening and Refinement Following Scoping Report provides a more detailed description of the refinements to the Westwood/UCLA Station following Draft EIS/EIR scoping in response to community comments and engineering requirements. 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/UCLA locations. In addition, the Westside Subway Extension Station Entrance Location Report and Recommendations provides a comparison of the potential entrance locations at Westwood Boulevard, Gayley Avenue and Veteran Avenue for both the On-Street and Off-Street Stations. All reports are available on the Metro Westside Subway Extension Project website: www.metro.net/projects/westside/westside-reports.
Your comment about selecting the most direct and least expensive route that generates the highest ridership has been noted. Ridership is indeed one of several important factors that Metro considers in its recommendations to the Board. In selecting a route, Metro considers several factors, including ridership, user benefits, travel time, capital costs, performance characteristics, and environmental impacts. Generally, the least expensive, most direct, and highest ridership route is the preferred route, but a combination or balancing of the factors identified above are used in making a selection. Between Beverly Hills and Century City, two route options – Santa Monica and Constellation North – were carried forward for further analysis in the Final EIS/EIR as part of the Locally Preferred Alternative (LPA). These route options reflect the two station location options remaining in Century City. In the case of the route options between Century City and Westwood, the East Alignment was selected as part of the LPA, as it is shorter and less costly than the West Alignment and has fewer environmental impacts than the Central Alignment.

Please refer to Sections 2.3, 2.4, and 2.5 of the Final EIS/EIR for an overview of the development of alternatives, including alignment locations, and the LPA selection process. The Westside Subway Extension Alternatives Screening and Refinement Following Scoping Report provides a more detailed description of the refinements to the alignments in the Century City vicinity following Draft EIS/EIR scoping in response to community comments and engineering requirements. This report is available on the Metro Westside Subway Extension Project website: www.metro.net/projects/westside/westside-reports.

Your comment in support of the Century City Constellation Station has been noted. On October 28, 2010, the Metro Board of Directors identified Alternative 2 (Westwood/VA Hospital Extension) as the Locally Preferred Alternative (LPA). As part of the LPA selection, the Metro Board of Directors decided to continue to study both station location options in Century City (Santa Monica Boulevard and Constellation Boulevard) to address concerns raised by the community regarding locating a station directly on a seismic fault and the safety of tunneling under homes and schools.

In response to the Metro Board of Director’s request for more information, further analysis was undertaken to focus on the engineering and environmental aspects of the two options during the preparation of the Final EIS/EIR to expand on the studies conducted in preparation of the Draft EIS/EIR. It should be noted that prior to conducting the comparative study, the Santa Monica Boulevard Station location was shifted slightly to the east from the location in the Draft EIS/EIR to avoid the Santa Monica Fault zone.

The geotechnical studies conducted during preparation of the Final EIS/EIR concluded that tunneling can be safely carried out beneath the Beverly Hills High School campus and the West Beverly Hills, Century City, and Westwood neighborhoods. However, these studies also determined that the Century City Santa Monica Station would cross the West Beverly
Hills Lineament, a northern extension of the active Newport-Inglewood Fault, which poses a significant safety risk to passengers at this station location. No evidence of faulting was found at the proposed Century City Constellation Station site.

In addition, the Century City Constellation Boulevard Station has the best pedestrian environment, can be expected to attract the most transit riders, and is centrally located to help shape the redevelopment of Century City as an important transit-oriented destination on the Westside Subway Extension. Further refinements to the ridership analysis concluded that the Century City Constellation Station would result in 3,350 more boardings along new Westside Subway Extension stations than the Century City Santa Monica Station due to proximity to jobs and residences within the critical 600-foot and 1/4-mile walksheds.

Based on all of these factors, the Century City Station Location Report concluded by recommending that the Century City Station be located along Constellation Boulevard due to seismic safety concerns at the Santa Monica Boulevard Station and higher ridership projections with Constellation Boulevard Station.

Please refer to Section 8.8.2 and 8.8.3 of the Final EIS/EIR for more detailed responses to concerns related to the Century City Station. Refer to Section 7.3 of the Final EIS/EIR and the Westside Subway Extension Century City Station Location Report for a comparison of the two Century City Station locations. The results of further geotechnical investigations in the Century City vicinity can be found in the Westside Subway Extension Century City Area Fault Investigation Report and the Westside Subway Extension Century City Area Tunneling Safety Report. The results of further ridership studies can be found in the Westside Subway Extension Technical Report Summarizing the Results of the Forecasted Alternatives and the Westside Subway Extension Century City TOD and Walk Access Study. All reports are available on the Metro Westside Subway Extension Project website: www.metro.net/projects/westside/westside-reports.

Your opinion on future transit connections to West Hollywood using a Pink Line has been noted. Any future transit lines separate from those analyzed in the study corridor are beyond the scope of the Westside Subway Extension Project.

Your comment on the Wilshire/Crenshaw Station has been noted. In October 2010, the Metro Board of Directors identified Alternative 2 (Westwood/VA Extension) as the Locally Preferred Alternative (LPA). A Wilshire/Crenshaw Station was not included in the LPA.

The Wilshire/Crenshaw Station would be located in the Park Mile section of Wilshire
Boulevard, adjacent to lower density land uses that are not planned for future growth in the adopted Community Plan and Park Mile Specific Plan. This site is only 0.5 mile from the existing Wilshire/Western Station and does not serve a major north south intersection, as Crenshaw Boulevard terminates at Wilshire Boulevard and does not extend to the north. Because this is a comparatively lower ridership station with a cost of $153 million, eliminating this station from the LPA improves the cost-effectiveness of Alternative 2. Furthermore, future connections from the Westside subway stations along Wilshire Boulevard to the planned Crenshaw/LAX Light Rail Transit project to the south have been recommended to take place at La Brea, La Cienega, or San Vicente rather than at Wilshire/Crenshaw.

Please refer to Sections 2.3, 2.4, and 2.5 of the Final EIS/EIR for an overview of the development of alternatives, including station locations, and the LPA selection process. The Westside Subway Extension Alternatives Screening and Refinement Following Scoping Report provides a more detailed description of the refinements to the Wilshire/Crenshaw Station following Draft EIS/EIR scoping in response to community comments and engineering requirements. This report is available on the Metro Westside Subway Extension Project website: www.metro.net/projects/westside/westside-reports.
333-1
Your comment in support of the Century City Constellation Station has been noted. On October 28, 2010, the Metro Board of Directors identified Alternative 2 (Westwood/VA Hospital Extension) as the Locally Preferred Alternative (LPA). As part of the LPA selection, the Metro Board of Directors decided to continue to study both station location options in Century City (Santa Monica Boulevard and Constellation Boulevard) to address concerns raised by the community regarding locating a station directly on a seismic fault and the safety of tunneling under homes and schools.

In response to the Metro Board of Director’s request for more information, further analysis was undertaken to focus on the engineering and environmental aspects of the two options during the preparation of the Final EIS/EIR to expand on the studies conducted in preparation of the Draft EIS/EIR. It should be noted that prior to conducting the comparative study, the Santa Monica Boulevard Station location was shifted slightly to the east from the location in the Draft EIS/EIR to avoid the Santa Monica Fault zone.

The geotechnical studies conducted during preparation of the Final EIS/EIR concluded that tunneling can be safely carried out beneath the Beverly Hills High School campus and the West Beverly Hills, Century City, and Westwood neighborhoods. However, these studies also determined that the Century City Santa Monica Station would cross the West Beverly Hills Lineament, a northern extension of the active Newport-Inglewood Fault, which poses a significant safety risk to passengers at this station location. No evidence of faulting was found at the proposed Century City Constellation Station site.

In addition, the Century City Constellation Boulevard Station has the best pedestrian environment, can be expected to attract the most transit riders, and is centrally located to help shape the redevelopment of Century City as an important transit-oriented destination on the Westside Subway Extension. Further refinements to the ridership analysis concluded that the Century City Constellation Station would result in 3,350 more boardings along new Westside Subway Extension stations than the Century City Santa Monica Station due to proximity to jobs and residences within the critical 600-foot and 1/4-mile walksheds.

Based on all of these factors, the Century City Station Location Report concluded by recommending that the Century City Station be located along Constellation Boulevard due to seismic safety concerns at the Santa Monica Boulevard Station and higher ridership projections with Constellation Boulevard Station.

Please refer to Section 8.8.2 and 8.8.3 of the Final EIS/EIR for more detailed responses to concerns related to the Century City Station. Refer to Section 7.3 of the Final EIS/EIR and the Westside Subway Extension Century City Station Location Report for a comparison of the two Century City Station locations. The results of further geotechnical investigations in the Century City vicinity can be found in the Westside Subway Extension Century City Area..
Your preference for the South location of the Westwood/VA Hospital Station has been noted. On October 28, 2010, the Metro Board of Directors identified Alternative 2 (Westwood/VA Hospital Extension) as the Locally Preferred Alternative (LPA). As part of the LPA selection, the Metro Board decided to continue to study both Westwood/VA Hospital station location options (South and North).

A comparative study of the two proposed Westwood/VA Hospital station locations, including engineering, costs, urban design, and environmental impact considerations, was conducted during the Final EIS/EIR to expand on the studies conducted in preparation of the Draft EIS/EIR.

While both options are within one-quarter mile of the VA Hospital, the Westwood/VA Hospital South Station site is 500 feet from the hospital and on the same side of Wilshire Boulevard, while the Westwood/VA Hospital North Station site is 1,200 feet away on the other side of Wilshire Boulevard. Additionally, the North Option could be problematic in the event of a future extension to Santa Monica due to the tight radius curve that would be required to extend west beneath residential properties. However, the construction of the South Option would result in more impacts to traffic circulation during construction, including temporary ramp closures at the I-405 interchange.

Based on these factors, the recommendation is to locate the Westwood/VA Hospital Station on the south side of Wilshire Boulevard as this location would provide better pedestrian access to the VA Medical Center and would more easily accommodate a future westward extension of the subway.

Your comment on future transit connections to a Sepulveda/I-405 line has been noted. The San Fernando Valley I-405 Corridor Connection is included in Metro’s 2009 Long Range Transportation Plan and funding has been allocated in Measure R for the project. Metro will undertake planning studies for the corridor to identify the mode, alignment and appropriate connections to other area transit projects, including the Westside Subway Extension.

Please refer to Section 8.8.5 of the Final EIS/EIR for more detailed responses to concerns related to the Westwood/VA Hospital Station and to Sections 2.3, 2.4, and 2.5 of the Final EIS/EIR for an overview of the development of alternatives, including station locations, and...
333-2
the LPA selection process. The Westside Subway Extension Alternatives Screening and Refinement Following Scoping Report provides a more detailed description of the refinements to the Westwood/VA Hospital Station following Draft EIS/EIR scoping in response to community comments and engineering requirements. 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 Station locations. All reports are available on the Metro Westside Subway Extension Project website: www.metro.net/projects/westside/westside-reports.

333-3
Your comment about selecting the most direct and least expensive route that generates the highest ridership has been noted. Ridership is indeed one of several important factors that Metro considers in its recommendations to the Board. In selecting a route, Metro considers several factors, including ridership, user benefits, travel time, capital costs, performance characteristics, and environmental impacts. Generally, the least expensive, most direct, and highest ridership route is the preferred route, but a combination or balancing of the factors identified above are used in making a selection. Between Beverly Hills and Century City, two route options – Santa Monica and Constellation North – were carried forward for further analysis in the Final EIS/EIR as part of the Locally Preferred Alternative (LPA). These route options reflect the two station location options remaining in Century City. In the case of the route options between Century City and Westwood, the East Alignment was selected as part of the LPA, as it is shorter and less costly than the West Alignment and has fewer environmental impacts than the Central Alignment.

Please refer to Sections 2.3, 2.4, and 2.5 of the Final EIS/EIR for an overview of the development of alternatives, including alignment locations, and the LPA selection process. The Westside Subway Extension Alternatives Screening and Refinement Following Scoping Report provides a more detailed description of the refinements to the alignments in the Century City vicinity following Draft EIS/EIR scoping in response to community comments and engineering requirements. This report is available on the Metro Westside Subway Extension Project website: www.metro.net/projects/westside/westside-reports.

333-4
Your preference for a modified Westwood/VA Hospital Station location has been noted. During the Draft EIS/EIR scoping, the public suggested that an additional station should be provided west of I-405 because of the large distance between a Westwood/UCLA and a Wilshire/Bundy Station, as well as a desire to serve communities west of the I-405 more effectively. In response, five proposed stations west of I-405 were studied—two at Westwood/VA Hospital (one north of Wilshire and one south of Wilshire), Wilshire/Federal, Wilshire/Barrington, and Wilshire/Bundy. In analyzing the proposed stations, the potential to
serve as a terminus station was an important consideration. In addition, all of the stations except for the stations at Westwood/VA Hospital are located too far west to be funded as part of Measure R and beyond the adopted LRTP.

The Wilshire/Federal Station would have been located on a site currently used by the U.S. Army Reserve, and the site was determined to be too small to accommodate the subway station without impacting adjacent historic homes in the VA property. From an engineering perspective, this also would have been a challenging site to construct a subway station because of the sharp curve of Wilshire Boulevard. Therefore, the Wilshire/Federal Station was eliminated from further consideration.

The Wilshire/Barrington Station would be located slightly west of the proposed Wilshire/Federal Station. While the Wilshire/Barrington Station is in a high density area with high ridership potential, comments were received from the community during scoping in opposition to locating a terminus station at Wilshire/Barrington due to traffic congestion and dense development concerns. Furthermore, the Wilshire/Barrington Station was not as evenly spaced between the Westwood/UCLA Station and the Wilshire/Bundy Station as is the Westwood/VA Hospital Station.

The Wilshire/Bundy Station is the farthest west of the terminus station considered and provided better potential transit connections as it aligns with the future planned Expo station at Olympic/Bundy. However, it is beyond Measure R funding.

Based on all of these considerations, and especially the fact that only the Westwood/VA Hospital Station is fundable within Measure R, the Wilshire/Federal, Wilshire/Barrington, and Wilshire/Bundy Stations were eliminated as potential terminus stations for the fundable Measure R alternatives. Both the North and South Options at the Westwood/VA Hospital Station were carried forward for further analysis in the Draft EIS/EIR. The Wilshire/Bundy Station was also carried forward into the Draft EIS/EIR as part of the Santa Monica Extension, which is beyond available Measure R funding, and would not serve as a terminus station.

An extension of the subway from Westwood to Santa Monica does demonstrate potential to be a successful rail transit line in the future. The extension is included in the Strategic Element of the 2009 LRTP. Therefore, further study could occur should funding be identified and secured in the future. The LPA will be designed so as not to preclude future westward extension.

Please refer to Section 8.8.5 of the Final EIS/EIR for more detailed responses to concerns related to the Westwood/VA Hospital Station and to Sections 2.3, 2.4, and 2.5 of the Final EIS/EIR for an overview of the development of alternatives, including station locations, and the LPA selection process. The Westside Subway Extension Alternatives Screening and
Refinement Following Scoping Report provides a more detailed description of the refinements to the Westwood/VA Hospital Station following Draft EIS/EIR scoping in response to community comments and engineering requirements. 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 Station locations in the Final EIS/EIR. All reports are available on the Metro Westside Subway Extension Project website: www.metro.net/projects/westside/westside-reports.

Your comment on future transit connections to the Crenshaw/LAX Line has been noted. In November 2009, the Metro Board voted to approve the Locally Preferred Alternative (LPA) for the Crenshaw/LAX Transit Corridor. The Crenshaw/LAX LPA includes an 8.5-mile light-rail line that would connect the Metro Green Line and the Expo Line along Crenshaw Boulevard. The Crenshaw/LAX LPA would not connect the line to Wilshire Boulevard.

A potential connection to Wilshire Boulevard was studied in a May 2009 Metro feasibility report. Although beyond the available project funding, this report determined that a connection at Wilshire/La Brea instead of Wilshire/Crenshaw would be more cost-effective and more compatible with existing land uses. Please refer to the Crenshaw Transit Corridor Project: Final Feasibility Study – Wilshire/La Brea Light Rail Transit Extension, available on the Crenshaw Transit Corridor Project page on the Metro website.

Keeping these recommendations in mind, the Westside Subway Extension Project, if approved for implementation, will be designed so as not to preclude future northward extensions of the Crenshaw/LAX line along La Brea, La Cienega, or San Vicente.

Your comment in support of Westside Subway Extension and other future transit projects, including Crenshaw/LAX, Sepulveda Pass, and West Hollywood has been noted.

Please refer to response to comment number 333-5 above regarding the Crenshaw/LAX Project.

The San Fernando Valley I-405 Corridor Connection (Sepulveda Pass) is included in Metro’s 2009 Long Range Transportation Plan and funding has been allocated in Measure R for the project. Metro will undertake planning studies for the corridor to identify the mode, alignment and appropriate connections to other area transit projects, including the Westside Subway Extension.

The Draft EIS/EIR showed that there is a market for transit improvements serving West
Hollywood, and this corridor is included in the Strategic Element of the 2009 Long Range Transportation Plan. Should funding be identified and secured, further study could be done to identify a project that would be competitive under Federal funding criteria.
From: Brenda_Ellerin@capgroup.com
To: Westside Extension; zev@bos.lacounty.gov
Subject: Santa Monica Option
Date: Thursday, September 30, 2010 8:36:45 AM

As a concerned parent, I am writing to let you know that I support the Santa Monica option which does not include tunnelling beneath Beverly Hills High School.

Thank you for your consideration,
Brenda Ellerin

Your comment in support of the Century City Santa Monica Station and concerns about tunneling beneath homes and schools has been noted. On October 28, 2010, the Metro Board of Directors identified Alternative 2 (Westwood/VA Hospital Extension) as the Locally Preferred Alternative (LPA). As part of the LPA selection, the Metro Board of Directors decided to continue to study both station location options in Century City (Santa Monica Boulevard and Constellation Boulevard) to address concerns raised by the community regarding locating a station directly on a seismic fault and the safety of tunneling under homes and schools. The Metro Board of Directors also decided to not include the Constellation South alignment between the Wilshire/Rodeo and Century City Stations as part of the LPA, but to continue to study the Constellation North and the Santa Monica Boulevard alignments. The Constellation South alignment passed beneath more residential properties than the Constellation North or Santa Monica Boulevard alignments. In addition, the Metro Board of Directors decided to not include the West or Central alignments between Century City and Westwood/UCLA as part of the LPA, but to continue to study the East alignment because the East alignment is the most direct and least expensive route between the two stations.

Safety, both during construction and eventual operations, is one of Metro’s highest priorities and is one of the key evaluation criteria in selection of the Locally Preferred Alternative (LPA). In response to the Metro Board of Director’s request for more information, further analysis was undertaken to focus on the engineering and environmental aspects of the two options during the preparation of the Final EIS/EIR to expand on the studies conducted in preparation of the Draft EIS/EIR. It should be noted that prior to conducting the comparative study, the Santa Monica Boulevard Station location was shifted slightly to the east from the location in the Draft EIS/EIR to avoid the Santa Monica Fault zone.

On most transit tunnel projects, significant portions of the alignment are constructed adjacent to or beneath buildings. The LPA passes beneath homes and schools in these neighborhoods because the curve radius required for subway tunnels is much wider than that required at a typical surface street intersection. The current alignment minimizes tunneling under buildings to the east and west of both the Century City Stations. The station position on Constellation Boulevard requires the tunnel alignment to be under the south portion of Beverly Hills High School Building B in order to reach the station location. There is no reasonable tunnel alignment that does not pass under homes or structures within the Beverly Hills High School campus.

The geotechnical studies conducted during preparation of the Final EIS/EIR concluded that tunneling can be safely carried out beneath the Beverly Hills High School campus and the West Beverly Hills, Century City, and Westwood neighborhoods. The use of state-of-the-art pressurized closed-face TBMs for soft-ground tunneling has greatly improved the control of ground movements such that tunneling can be done with minimal surface settlements. The presence of the tunnels will neither affect the risk to buildings above them during an
earthquake nor change the severity of shaking. Finally, tunnels can be constructed and operated safely in gassy grounds and oil wells do not pose an unmitigable risk to tunneling.

The additional detailed geotechnical studies also assessed soil conditions and determine the potential for noise or vibration impacts on the surface along the refined alignments. These studies concluded that the predicted vibration and noise levels are within the FTA requirements and operation of the subway is not anticipated to have adverse impacts with the implementation of mitigation, including areas where the tunnels pass beneath homes and schools. During construction, low levels of noise and vibration may be experienced for a day or two as each of the two TBMs pass under a given location. In addition, as the tunnels are driven, construction trains bring supplies to and from the tunnel heading. However, these underground construction noises will also be controlled to be within Metro criteria.

The Westside Subway Extension will not reduce the availability of BHHS for use as an emergency shelter or impact the operations of its use as an emergency shelter. Furthermore, tunneling would not prevent future development of the BHHS campus. The vertical alignment of the tunnel would be 55 to 70 feet below the ground surface (to the top of the tunnel), which would allow for construction of an underground structure over the tunnel at a later date.

These geotechnical studies also determined that the Century City Santa Monica Station would cross the West Beverly Hills Lineament, a northern extension of the active Newport-Inglewood Fault, which poses a significant safety risk to passengers at this station location. No evidence of faulting was found at the proposed Century City Constellation Station site. Tunnels to the east and west of Century City pass through at least two active faults. However, there are numerous tools, designs, and construction means and methods that have been used elsewhere that can be used to safely tunnel through these fault zones.

In addition, the Century City Constellation Boulevard Station has the best pedestrian environment, can be expected to attract the most transit riders, and is centrally located to help shape the redevelopment of Century City as an important transit-oriented destination on the Westside Subway Extension. Further refinements to the ridership analysis concluded that the Century City Constellation Station would result in 3,350 more boardings along new Westside Subway Extension stations than the Century City Santa Monica Station due to proximity to jobs and residences within the critical 600-foot and 1/4-mile walksheds.

Based on all of these factors, the Century City Station Location Report concluded by recommending that the Century City Station be located along Constellation Boulevard due to seismic safety concerns at the Santa Monica Boulevard Station and higher ridership
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Your comment in support of the Century City Constellation Station has been noted. On October 28, 2010, the Metro Board of Directors identified Alternative 2 (Westwood/VA Hospital Extension) as the Locally Preferred Alternative (LPA). As part of the LPA selection, the Metro Board of Directors decided to continue to study both station location options in Century City (Santa Monica Boulevard and Constellation Boulevard) to address concerns raised by the community regarding locating a station directly on a seismic fault and the safety of tunneling under homes and schools.

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The geotechnical studies conducted during preparation of the Final EIS/EIR concluded that tunneling can be safely carried out beneath the Beverly Hills High School campus and the West Beverly Hills, Century City, and Westwood neighborhoods. However, these studies also determined that the Century City Santa Monica Station would cross the West Beverly Hills Lineament, a northern extension of the active Newport-Inglewood Fault, which poses a significant safety risk to passengers at this station location. No evidence of faulting was found at the proposed Century City Constellation Station site.

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Fault Investigation Report and the Westside Subway Extension Century City Area Tunneling Safety Report. The results of further ridership studies can be found in the Westside Subway Extension Technical Report Summarizing the Results of the Forecasted Alternatives and the Westside Subway Extension Century City TOD and Walk Access Study. All reports are available on the Metro Westside Subway Extension Project website: www.metro.net/projects/westside/westside-reports.
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Your preference for the TSM Alternative has been noted. On October 28, 2010, the Metro Board of Directors identified Alternative 2 (Westwood/VA Hospital Extension) as the Locally Preferred Alternative (LPA). Alternative 2 was selected as the LPA because the analysis in the Draft EIS/EIR demonstrated that the Build Alternatives would be more effective than the TSM Alternative in terms of enhancing mobility, serving development opportunities, and addressing other aspects of the Purpose and Need for the Project. Please refer to Chapter 7 of the Draft EIS/EIR and Section 2.5 of the Final EIS/EIR for information on this analysis.

Furthermore, the Project would not eliminate bus service along Wilshire Boulevard but rather would supplement it with rail. As explained in Chapter 2, Metro Local, Limited, Rapid, and Express bus service along Wilshire Boulevard will continue to operate in conjunction with the rail system, if approved and implemented. The Wilshire Boulevard Bus Rapid Transit project is also assumed to be in place. Maintenance of local bus service levels is an important component of the transit system serving the Westside Corridor. With the extension the Purple Line subway service to the Westwood/VA Hospital Station, it is estimated that one-third of demand would involve local bus access. Metro continues to seek to improve the region’s transit needs and continually evaluates various transit corridors to achieve a more interconnected transportation system. To help guide design of subway stations, potential enhanced local bus service at stations was assessed and is discussed in Chapter 3 of the Final EIS/EIR.

The Project will be funded primarily through a combination of Measure R local funds and Federal New Starts funds, with some other local, State, and Federal funds. Metro will continue to use a combination of local, State, and Federal funding sources to operate and maintain the system. In addition to these funding sources, Metro relies on fare revenues to fund about one-third of its operating costs. Bus operating funds will not be used to construct the Project, and no fare increases or service reductions are proposed to cover the Project’s costs. The selection of the TSM Alternative would not have resulted in lower fares. The Metro Board of Directors establishes fares. Currently, the Base Fare for each boarding is $1.50 and the Metro Day Pass is $5.00. A transfer is the same as the Base Fare - $1.50.

Furthermore, the Westside Subway Extension Project will increase transit options and improve mobility for residents across Los Angeles County, including low-income and minority residents who are transit-dependent. Transit service is meant to serve where the demand is greatest, and these areas are often within neighborhoods that have Environmental Justice (EJ) populations and communities of concern. Four of the seven stations are located in, or adjacent to the Environmental Justice populations identified in Section 4.2.6 of the Final EIS/EIR. Therefore, people living in EJ populations will have the same opportunity to access the transit and mobility improvements provided by the subway.

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. Transit user benefits associated with the LPA are anticipated both along the Project corridor as well as across the region. The transit benefits associated with the LPA are further detailed in Section 3.4 of the Final EIS/EIR.
Comment from
First Name: eleanor
Last Name: espensen
Email: ellie2266@verizon.net
Phone: 310-450-8001
URL:
------------------------------------------------------------------------
I am primarily concerned that the earlier plan to dismember the Bergamot Station art complex will be revived. This would be a terrible thing to do. That complex is one of Santa Monica’s very important sites and should neither be removed nor made inaccessible by years of nearby construction. I’m 84 years old and can’t get to the meetings because I don’t drive at night, but if I had to walk the sidewalks with a sandwich board sign to save Bergamot Station, I’d do that.
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Your comment on the Bergamot Station Art Complex has been noted. The Bergamot Station Art Complex is located near Olympic Boulevard and Cloverfield Boulevard and is not in the immediate vicinity of the Westside Subway Extension Project. It would not be acquired as part of the Project.
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Your comment supporting the West location for the Wilshire/Fairfax Station has been noted. On October 28, 2010, the Metro Board of Directors identified Alternative 2 (Westwood/VA Hospital Extension) as the Locally Preferred Alternative, which includes the Wilshire/Fairfax East Station location due to stronger community support and better access and land integration opportunities, including proximity to Museum Row.

Please refer to Sections 2.3, 2.4, and 2.5 of the Final EIS/EIR for an overview of the development of alternatives, including station locations, and the LPA selection process. The Westside Subway Extension Alternatives Screening and Refinement Following Scoping Report provides a more detailed description of the refinements to the Wilshire/Fairfax Station following Draft EIS/EIR scoping in response to community comments and engineering requirements. This report is available on the Metro Westside Subway Extension Project website: www.metro.net/projects/westside/westside-reports.
Your comment in support of the Century City Santa Monica Station and concerns about tunneling beneath homes and schools has been noted. On October 28, 2010, the Metro Board of Directors identified Alternative 2 (Westwood/VA Hospital Extension) as the Locally Preferred Alternative (LPA). As part of the LPA selection, the Metro Board of Directors decided to continue to study both station location options in Century City (Santa Monica Boulevard and Constellation Boulevard) to address concerns raised by the community regarding locating a station directly on a seismic fault and the safety of tunneling under homes and schools. The Metro Board of Directors also decided to not include the Constellation South alignment between the Wilshire/Rodeo and Century City Stations as part of the LPA, but to continue to study the Constellation North and the Santa Monica Boulevard alignments. The Constellation South alignment passed beneath more residential properties than the Constellation North or Santa Monica Boulevard alignments. In addition, the Metro Board of Directors decided to not include the West or Central alignments between Century City and Westwood/UCLA as part of the LPA, but to continue to study the East alignment because the East alignment is the most direct and least expensive route between the two stations.

Safety, both during construction and eventual operations, is one of Metro’s highest priorities and is one of the key evaluation criteria in selection of the Locally Preferred Alternative (LPA). In response to the Metro Board of Director’s request for more information, further analysis was undertaken to focus on the engineering and environmental aspects of the two options during the preparation of the Final EIS/EIR to expand on the studies conducted in preparation of the Draft EIS/EIR. It should be noted that prior to conducting the comparative study, the Santa Monica Boulevard Station location was shifted slightly to the east from the location in the Draft EIS/EIR to avoid the Santa Monica Fault zone.

On most transit tunnel projects, significant portions of the alignment are constructed adjacent to or beneath buildings. The LPA passes beneath homes and schools in these neighborhoods because the curve radius required for subway tunnels is much wider than that required at a typical surface street intersection. The current alignment minimizes tunneling under buildings to the east and west of both the Century City Stations. The station position on Constellation Boulevard requires the tunnel alignment to be under the south portion of Beverly Hills High School Building B in order to reach the station location. There is no reasonable tunnel alignment that does not pass under homes or structures within the Beverly Hills High School campus.

The geotechnical studies conducted during preparation of the Final EIS/EIR concluded that tunneling can be safely carried out beneath the Beverly Hills High School campus and the West Beverly Hills, Century City, and Westwood neighborhoods. The use of state-of-the-art pressurized closed-face TBMs for soft-ground tunneling has greatly improved the control of ground movements such that tunneling can be done with minimal surface settlements. The presence of the tunnels will neither affect the risk to buildings above them during an
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earthquake nor change the severity of shaking. Finally, tunnels can be constructed and operated safely in gassy grounds and oil wells do not pose an unmitigatable risk to tunneling.

The additional detailed geotechnical studies also assessed soil conditions and determine the potential for noise or vibration impacts on the surface along the refined alignments. These studies concluded that the predicted vibration and noise levels are within the FTA requirements and operation of the subway is not anticipated to have adverse impacts with the implementation of mitigation, including areas where the tunnels pass beneath homes and schools. During construction, low levels of noise and vibration may be experienced for a day or two as each of the two TBMs pass under a given location. In addition, as the tunnels are driven, construction trains bring supplies to and from the tunnel heading. However, these underground construction noises will also be controlled to be within Metro criteria.

The Westside Subway Extension will not reduce the availability of BHHS for use as an emergency shelter or impact the operations of its use as an emergency shelter. Furthermore, tunneling would not prevent future development of the BHHS campus. The vertical alignment of the tunnel would be 55 to 70 feet below the ground surface (to the top of the tunnel), which would allow for construction of an underground structure over the tunnel at a later date.

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The Century City station should be built at Constellation (in the center), not Santa Monica (on the edge). There is no point to study a station and route along Santa Monica Blvd as there is an active fault there. Plus, Constellation offers much better access to more of Century City. Don’t build a subway station to serve a golf course!

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Your comment regarding property values has been noted.

Since the LPA will improve transit service in the Study Area, research suggests that it is likely that properties within walking distance of the stations will realize value premiums over similar properties that are farther away. Based on studies of other regions with transit systems (i.e., San Francisco, San Diego, and San Jose, California; New York, New York; and Portland, Oregon), an average home price increase of 6.4 percent within one-half mile of each transit station may be experienced. Although most studies on real estate value impacts from transit show increases in value, they cannot explicitly isolate transit benefits from other market forces that affect real estate values.

Value increases within proximity of a transit station are realized in sales price as well as rent premiums. For residential properties, these increases resulted from potential commute or recreational travel time savings and associated vehicle cost reductions (including both reduced mileage as well as a reduction in the number of cars owned by the household).

Negative impacts on property values from transit (termed “nuisance” effects) also can occur but are not anticipated to result from this Project. Measurable noise impacts from vehicles, increased foot traffic, adjacent structures, transit-associated parking, and increased bus traffic interfacing with transit stations can reduce the desirability of properties near a fixed guideway station. Such nuisance effects will most likely occur in areas where value is not attributed to the accessibility improvements that transit provides. This does not appear likely within the Study Area, as stations are planned for areas that are already densely developed and near major roads and bus routes.

All residents and businesses displaced as a result of the LPA will be given advance written notice and will be informed of their eligibility for relocation assistance and payments under the Uniform Relocation Assistance and Real Property Acquisition Policies Act. In areas where the subway operates under private property, Metro will work with the property owner to secure a subsurface easement. The following mitigation measures will be implemented to ensure just compensation for acquisitions and easements:

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

Please refer to Sections 4.2.2, 4.2.3, and 4.2.4 of this Final EIS/EIR for a discussion of the economic and fiscal impacts of the Project, including property acquisitions and easements. Refer to the Westside Subway Extension Economic and Fiscal Impacts Analysis and Mitigation Report for a more detailed discussion of property value impacts.
Your comment regarding concerns about tunneling beneath homes and schools has been noted. On October 28, 2010, the Metro Board of Directors identified Alternative 2 (Westwood/VA Hospital Extension) as the Locally Preferred Alternative (LPA). As part of the LPA selection, the Metro Board of Directors decided to continue to study both station location options in Century City (Santa Monica Boulevard and Constellation Boulevard) to address concerns raised by the community regarding locating a station directly on a seismic fault and the safety of tunneling under homes and schools. The Metro Board of Directors also decided to not include the Constellation South alignment between the Wilshire/Rodeo and Century City Stations as part of the LPA, but to continue to study the Constellation North and the Santa Monica Boulevard alignments. The Constellation South alignment passed beneath more residential properties than the Constellation North or Santa Monica Boulevard alignments. In addition, the Metro Board of Directors decided to not include the West or Central alignments between Century City and Westwood/UCLA as part of the LPA, but to continue to study the East alignment because the East alignment is the most direct and least expensive route between the two stations.

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On most transit tunnel projects, significant portions of the alignment are constructed adjacent to or beneath buildings. The LPA passes beneath homes and schools in these neighborhoods because the curve radius required for subway tunnels is much wider than that required at a typical surface street intersection. The current alignment minimizes tunneling under buildings to the east and west of both the Century City Stations. The station position on Constellation Boulevard requires the tunnel alignment to be under the south portion of Beverly Hills High School Building B in order to reach the station location. There is no reasonable tunnel alignment that does not pass under homes or structures within the Beverly Hills High School campus.

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operated safely in gassy grounds and oil wells do not pose an unmitigable risk to tunneling.

The additional detailed geotechnical studies also assessed soil conditions and determine the potential for noise or vibration impacts on the surface along the refined alignments. These studies concluded that the predicted vibration and noise levels are within the FTA requirements and operation of the subway is not anticipated to have adverse impacts with the implementation of mitigation, including areas where the tunnels pass beneath homes and schools. During construction, low levels of noise and vibration may be experienced for a day or two as each of the two TBMs pass under a given location. In addition, as the tunnels are driven, construction trains bring supplies to and from the tunnel heading. However, these underground construction noises will also be controlled to be within Metro criteria.

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These geotechnical studies also determined that the Century City Santa Monica Station would cross the West Beverly Hills Lineament, a northern extension of the active Newport-Inglewood Fault, which poses a significant safety risk to passengers at this station location. No evidence of faulting was found at the proposed Century City Constellation Station site. Tunnels to the east and west of Century City pass through at least two active faults. However, there are numerous tools, designs, and construction means and methods that have been used elsewhere that can be used to safely tunnel through these fault zones.

In addition, the Century City Constellation Boulevard Station has the best pedestrian environment, can be expected to attract the most transit riders, and is centrally located to help shape the redevelopment of Century City as an important transit-oriented destination on the Westside Subway Extension. Further refinements to the ridership analysis concluded that the Century City Constellation Station would result in 3,350 more boardings along new Westside Subway Extension stations than the Century City Santa Monica Station due to proximity to jobs and residences within the critical 600-foot and 1/4-mile walksheds.

Based on all of these factors, the Century City Station Location Report concluded by recommending that the Century City Station be located along Constellation Boulevard due to seismic safety concerns at the Santa Monica Boulevard Station and higher ridership projections with Constellation Boulevard Station.
Please refer to Section 8.8.2 and 8.8.3 of the Final EIS/EIR for more detailed responses to concerns related to the Century City Station and alignments and Section 8.8.4 of the Final EIS/EIR for a more detailed response to geotechnical concerns. Refer to Section 7.3 of the Final EIS/EIR and the Westside Subway Extension Century City Station Location Report for a comparison of the two Century City Station locations. The results of further geotechnical investigations in the Century City vicinity can be found in the Westside Subway Extension Century City Area Fault Investigation Report and the Westside Subway Extension Century City Area Tunneling Safety Report. The results of further ridership studies can be found in the Westside Subway Extension Technical Report Summarizing the Results of the Forecasted Alternatives and the Westside Subway Extension Century City TOD and Walk Access Study. All reports are available on the Metro Westside Subway Extension Project website: www.metro.net/projects/westside/westside-reports.

Your comment regarding bus connections to the center of Century City has been noted. With regard to station access and its effects on ridership, the forecasting model uses estimated future bus service levels by Metro and other public transit providers. Potential higher service levels involving feeder bus access, including access in the Century City area, were studied with results incorporated in Chapter 3 of the Final EIS/EIR. 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.
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**Submission Content:**

I am really looking forward to the Westside Extension. It is a great project. Not only will it ease travel for those who will use the subway, but it will also ease traffic on the roads and freeways for those who will drive their cars.

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357-1

Your comment in support of the Westside Subway Extension Project has been noted. On October 28, 2010, the Metro Board of Directors identified Alternative 2 (Westwood/VA Hospital Extension) as the Locally Preferred Alternative. Only Alternatives 1 and 2 are affordable within the adopted Long Range Transportation Plan, and between them, Alternative 2 provides higher ridership and improved cost effectiveness. Additionally, Alternative 2 serves the VA Hospital and other communities west of the I-405 more effectively.

Please refer to Sections 2.3, 2.4, and 2.5 of the Final EIS/EIR for an overview of the development of alternatives and the LPA selection process.
Has MTA considered an elevated rail option instead of tunnels?

Your comment about alternative routes and technologies for the subway has been noted. Between 2007 and 2009, Metro conducted an Alternatives Analysis (AA) Study for the Westside Corridor. The AA Study considered the need for transit improvements in the corridor and evaluated various transit technologies and alignments. During Early Scoping meetings, Metro presented the public with technology options that included Heavy Rail Transit (HRT), Light Rail Transit (LRT), and Bus Rapid Transit (BRT). In response to comments received, Metro added monorail to those other technologies to be analyzed in the AA Study. As a result of these analyses, the Metro Board decided to carry five subway alternatives into the Draft EIS/EIR. An underground alignment was recommended because it has fewer land use, traffic, visual, historic, and noise impacts than an elevated alignment. This is due to the impacts an elevated alignment would have on adjacent buildings (some historic), visual quality, shadow, noise, land acquisitions and traffic, as well as the mitigations needed. The AA Study also identified HRT as the preferred mode for further study because it has the capacity to meet the anticipated ridership demand and would minimize the number of transfers.

Please refer to Section 2.3 of the Final EIS/EIR and the Westside Transit Corridor Alternatives Analysis Study, available on the Metro Westside Subway Extension Project website: www.metro.net/projects/westside/westside-reports.
Your comments in support of the Westside Subway Extension and the Century City Constellation Station have been noted. On October 28, 2010, the Metro Board of Directors identified Alternative 2 (Westwood/VA Hospital Extension) as the Locally Preferred Alternative (LPA). As part of the LPA selection, the Metro Board of Directors decided to continue to study both station location options in Century City (Santa Monica Boulevard and Constellation Boulevard) to address concerns raised by the community regarding locating a station directly on a seismic fault and the safety of tunneling under homes and schools.

In response to the Metro Board of Director's request for more information, further analysis was undertaken to focus on the engineering and environmental aspects of the two options during the preparation of the Final EIS/EIR to expand on the studies conducted in preparation of the Draft EIS/EIR. It should be noted that prior to conducting the comparative study, the Santa Monica Boulevard Station location was shifted slightly to the east from the location in the Draft EIS/EIR to avoid the Santa Monica Fault zone.

The geotechnical studies conducted during preparation of the Final EIS/EIR concluded that tunneling can be safely carried out beneath the Beverly Hills High School campus and the West Beverly Hills, Century City, and Westwood neighborhoods. However, these studies also determined that the Century City Santa Monica Station would cross the West Beverly Hills Lineament, a northern extension of the active Newport-Inglewood Fault, which poses a significant safety risk to passengers at this station location. No evidence of faulting was found at the proposed Century City Constellation Station site.

In addition, the Century City Constellation Boulevard Station has the best pedestrian environment, can be expected to attract the most transit riders, and is centrally located to help shape the redevelopment of Century City as an important transit-oriented destination on the Westside Subway Extension. Further refinements to the ridership analysis concluded that the Century City Constellation Station would result in 3,350 more boardings along new Westside Subway Extension stations than the Century City Santa Monica Station due to proximity to jobs and residences within the critical 600-foot and 1/4-mile walksheds.

Based on all of these factors, the Century City Station Location Report concluded by recommending that the Century City Station be located along Constellation Boulevard due to seismic safety concerns at the Santa Monica Boulevard Station and higher ridership projections with Constellation Boulevard Station.

Please refer to Section 8.8.2 and 8.8.3 of the Final EIS/EIR for more detailed responses to concerns related to the Century City Station. Refer to Section 7.3 of the Final EIS/EIR and the Westside Subway Extension Century City Station Location Report for a comparison of the two Century City Station locations. The results of further geotechnical investigations in
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Your comment in support of the Century City Constellation Station and East Route has been noted. On October 28, 2010, the Metro Board of Directors identified Alternative 2 (Westwood/VA Hospital Extension) as the Locally Preferred Alternative (LPA). As part of the LPA selection, the Metro Board of Directors decided to continue to study both station location options in Century City (Santa Monica Boulevard and Constellation Boulevard) to address concerns raised by the community regarding locating a station directly on a seismic fault and the safety of tunneling under homes and schools. In addition, the Metro Board of Directors decided to not include the West or Central alignments between Century City and Westwood/UCLA as part of the LPA, but to continue to study the East alignment because the East alignment is the most direct and least expensive route between the two stations.

In response to the Metro Board of Director’s request for more information, further analysis was undertaken to focus on the engineering and environmental aspects of the two options during the preparation of the Final EIS/EIR to expand on the studies conducted in preparation of the Draft EIS/EIR. It should be noted that prior to conducting the comparative study, the Santa Monica Boulevard Station location was shifted slightly to the east from the location in the Draft EIS/EIR to avoid the Santa Monica Fault zone.

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Your comment in support of the Century City Constellation Station has been noted. On October 28, 2010, the Metro Board of Directors identified Alternative 2 (Westwood/VA Hospital Extension) as the Locally Preferred Alternative (LPA). As part of the LPA selection, the Metro Board of Directors decided to continue to study both station location options in Century City (Santa Monica Boulevard and Constellation Boulevard) to address concerns raised by the community regarding locating a station directly on a seismic fault and the safety of tunneling under homes and schools.

In response to the Metro Board of Director’s request for more information, further analysis was undertaken to focus on the engineering and environmental aspects of the two options during the preparation of the Final EIS/EIR to expand on the studies conducted in preparation of the Draft EIS/EIR. It should be noted that prior to conducting the comparative study, the Santa Monica Boulevard Station location was shifted slightly to the east from the location in the Draft EIS/EIR to avoid the Santa Monica Fault zone.

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Fault Investigation Report and the Westside Subway Extension Century City Area Tunneling Safety Report. The results of further ridership studies can be found in the Westside Subway Extension Technical Report Summarizing the Results of the Forecasted Alternatives and the Westside Subway Extension Century City TOD and Walk Access Study. All reports are available on the Metro Westside Subway Extension Project website: www.metro.net/projects/westside/westside-reports.
Your comment in support of the Century City Santa Monica Station and concerns about tunneling beneath homes and schools has been noted. On October 28, 2010, the Metro Board of Directors identified Alternative 2 (Westwood/VA Hospital Extension) as the Locally Preferred Alternative (LPA). As part of the LPA selection, the Metro Board of Directors decided to continue to study both station location options in Century City (Santa Monica Boulevard and Constellation Boulevard) to address concerns raised by the community regarding locating a station directly on a seismic fault and the safety of tunneling under homes and schools. The Metro Board of Directors also decided to not include the Constellation South alignment between the Wilshire/Rodeo and Century City Stations as part of the LPA, but to continue to study the Constellation North and the Santa Monica Boulevard alignments. The Constellation South alignment passed beneath more residential properties than the Constellation North or Santa Monica Boulevard alignments. In addition, the Metro Board of Directors decided to not include the West or Central alignments between Century City and Westwood/UCLA as part of the LPA, but to continue to study the East alignment because the East alignment is the most direct and least expensive route between the two stations.

Safety, both during construction and eventual operations, is one of Metro’s highest priorities and is one of the key evaluation criteria in selection of the Locally Preferred Alternative (LPA). In response to the Metro Board of Director’s request for more information, further analysis was undertaken to focus on the engineering and environmental aspects of the two options during the preparation of the Final EIS/EIR to expand on the studies conducted in preparation of the Draft EIS/EIR. It should be noted that prior to conducting the comparative study, the Santa Monica Boulevard Station location was shifted slightly to the east from the location in the Draft EIS/EIR to avoid the Santa Monica Fault zone.

On most transit tunnel projects, significant portions of the alignment are constructed adjacent to or beneath buildings. The LPA passes beneath homes and schools in these neighborhoods because the curve radius required for subway tunnels is much wider than that required at a typical surface street intersection. The current alignment minimizes tunneling under buildings to the east and west of both the Century City Stations. The station position on Constellation Boulevard requires the tunnel alignment to be under the south portion of Beverly Hills High School Building B in order to reach the station location. There is no reasonable tunnel alignment that does not pass under homes or structures within the Beverly Hills High School campus.

The geotechnical studies conducted during preparation of the Final EIS/EIR concluded that tunneling can be safely carried out beneath the Beverly Hills High School campus and the West Beverly Hills, Century City, and Westwood neighborhoods. The use of state-of-the-art pressurized closed-face TBMs for soft-ground tunneling has greatly improved the control of ground movements such that tunneling can be done with minimal surface settlements. The presence of the tunnels will neither affect the risk to buildings above them during an
earthquake nor change the severity of shaking. Finally, tunnels can be constructed and operated safely in gassy grounds and oil wells do not pose an unmitigatable risk to tunneling.

The additional detailed geotechnical studies also assessed soil conditions and determine the potential for noise or vibration impacts on the surface along the refined alignments. These studies concluded that the predicted vibration and noise levels are within the FTA requirements and operation of the subway is not anticipated to have adverse impacts with the implementation of mitigation, including areas where the tunnels pass beneath homes and schools. During construction, low levels of noise and vibration may be experienced for a day or two as each of the two TBMs pass under a given location. In addition, as the tunnels are driven, construction trains bring supplies to and from the tunnel heading. However, these underground construction noises will also be controlled to be within Metro criteria.

The Westside Subway Extension will not reduce the availability of BHHS for use as an emergency shelter or impact the operations of its use as an emergency shelter. Furthermore, tunneling would not prevent future development of the BHHS campus. The vertical alignment of the tunnel would be 55 to 70 feet below the ground surface (to the top of the tunnel), which would allow for construction of an underground structure over the tunnel at a later date.

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Your comment in support of the Century City Santa Monica Station location and concerns about tunneling beneath homes and schools as well as the development of the Century City station and alignment options has been noted.

Metro followed FTA’s New Starts project planning and development process and carefully considered public input in developing the location of the Century City Station. The process of determining the location of the Century City Station began with the Westside Transit Corridor Alternatives Analysis Study in 2007. At the beginning of the Alternatives Analysis (AA) Study, two general corridors—one along Wilshire Boulevard and the other along Santa Monica Boulevard—were presented to the public at Early Scoping meetings. Some people who spoke at the Early Scoping meetings generally supported the proposed station locations that were presented (Santa Monica Boulevard in Century City being one of them). However, some attendees also suggested additional or alternate station locations, with some commenting that the station in Century City should be south of Santa Monica Boulevard, closer to the center of Century City, which Metro took into consideration.

During scoping for the Draft EIS/EIR in 2009, Metro sought additional public comment on the alignment and station options in the Beverly Hills to Westwood area, including the Century City Station location. During preparation of the Draft EIS/EIR, the alignment and station locations were refined to avoid impacts to the natural and built environments where feasible, provide a cost-effective solution to increase east/west mobility in the Study Area, and respond to public and agency input. The analysis and refinement of the station and alignment locations, including the Century City Station location, are described in the Westside Subway Extension Alternatives Screening and Refinement Following Scoping Report. Ultimately, the Century City Santa Monica Station and the Century City Constellation Station were carried forward for analysis in the Draft EIS/EIR.

Following public circulation of the Draft EIS/EIR, on October 28, 2010, the Metro Board of Directors identified Alternative 2 (Westwood/VA Hospital Extension) as the Locally Preferred Alternative (LPA). As part of the LPA selection, the Metro Board of Directors decided to continue to study both station location options in Century City (Santa Monica Boulevard and Constellation Boulevard) to address concerns raised by the community regarding locating a station directly on a seismic fault and the safety of tunneling under homes and schools. The Metro Board of Directors also decided to not include the Constellation South alignment between the Wilshire/Rodeo and Century City Stations as part of the LPA, but to continue to study the Constellation North and the Santa Monica Boulevard alignments. The Constellation South alignment passed beneath more residential properties than the Constellation North or Santa Monica Boulevard alignments. In addition, the Metro Board of Directors decided to not include the West or Central alignments between Century City and Westwood/UCLA as part of the LPA, but to continue to study the East alignment because the East alignment is the most direct and least expensive route between the two stations.
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<td>Submission Content</td>
<td>As a daily rider bus rider on the Wilshire corridor, I am looking forward to the public health and mobility benefits that the Transportation System Management (TSM) Alternative in the Westside Subway Extension Draft Environmental Impact Report could have for Wilshire Blvd. If chose, this option could create a more robust bus system by improving upon the existing Metro Rapid Bus service and local bus service in the Westside Extension Transit Corridor study area. As I rider, I support TSM.</td>
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804-1

Your preference for the TSM Alternative has been noted. On October 28, 2010, the Metro Board of Directors identified Alternative 2 (Westwood/VA Hospital Extension) as the Locally Preferred Alternative (LPA). Alternative 2 was selected as the LPA because the analysis in the Draft EIS/EIR demonstrated that the Build Alternatives would be more effective than the TSM Alternative in terms of enhancing mobility, serving development opportunities, and addressing other aspects of the Purpose and Need for the Project. Please refer to Chapter 7 of the Draft EIS/EIR and Section 2.5 of the Final EIS/EIR for information on this analysis.

Furthermore, the Project would not eliminate bus service along Wilshire Boulevard but rather would supplement it with rail. As explained in Chapter 2, Metro Local, Limited, Rapid, and Express bus service along Wilshire Boulevard will continue to operate in conjunction with the rail system, if approved and implemented. The Wilshire Boulevard Bus Rapid Transit project is also assumed to be in place. Maintenance of local bus service levels is an important component of the transit system serving the Westside Corridor. With the extension the Purple Line subway service to the Westwood/VA Hospital Station, it is estimated that one-third of demand would involve local bus access. Metro continues to seek to improve the region's transit needs and continually evaluates various transit corridors to achieve a more interconnected transportation system. To help guide design of subway stations, potential enhanced local bus service at stations was assessed and is discussed in Chapter 3 of the Final EIS/EIR.

The Project will be funded primarily through a combination of Measure R local funds and Federal New Starts funds, with some other local, State, and Federal funds. Metro will continue to use a combination of local, State, and Federal funding sources to operate and maintain the system. In addition to these funding sources, Metro relies on fare revenues to fund about one-third of its operating costs. Bus operating funds will not be used to construct the Project, and no fare increases or service reductions are proposed to cover the Project's costs. The selection of the TSM Alternative would not have resulted in lower fares. The Metro Board of Directors establishes fares. Currently, the Base Fare for each boarding is $1.50 and the Metro Day Pass is $5.00. A transfer is the same as the Base Fare - $1.50.

Furthermore, the Westside Subway Extension Project will increase transit options and improve mobility for residents across Los Angeles County, including low-income and minority residents who are transit-dependent. Transit service is meant to serve where the demand is greatest, and these areas are often within neighborhoods that have Environmental Justice (EJ) populations and communities of concern. Four of the seven stations are located in, or adjacent to the Environmental Justice populations identified in Section 4.2.6 of the Final EIS/EIR. Therefore, people living in EJ populations will have the same opportunity to access the transit and mobility improvements provided by the subway.

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. Transit user benefits associated with the LPA are anticipated both along the Project corridor as well as across the region. The transit benefits associated with the LPA are further detailed in Section 3.4 of the Final EIS/EIR.
Your comment in support of the Westside Subway Extension Project has been noted. On October 28, 2010, the Metro Board of Directors identified Alternative 2 (Westwood/VA Hospital Extension) as the Locally Preferred Alternative. Only Alternatives 1 and 2 are affordable within the adopted Long Range Transportation Plan, and between them, Alternative 2 provides higher ridership and improved cost effectiveness. Additionally, Alternative 2 serves the VA Hospital and other communities west of the I-405 more effectively.

Please refer to Sections 2.3, 2.4, and 2.5 of the Final EIS/EIR for an overview of the development of alternatives and the LPA selection process.

Your comment in support of the Century City Constellation Station and your comment regarding the tearing down of existing Century City buildings for the Project have been noted. On October 28, 2010, the Metro Board of Directors identified Alternative 2 (Westwood/VA Hospital Extension) as the Locally Preferred Alternative (LPA). As part of the LPA selection, the Metro Board of Directors decided to continue to study both station location options in Century City (Santa Monica Boulevard and Constellation Boulevard) to address concerns raised by the community regarding locating a station directly on a seismic fault and the safety of tunneling under homes and schools.

In response to the Metro Board of Director’s request for more information, further analysis was undertaken to focus on the engineering and environmental aspects of the two options during the preparation of the Final EIS/EIR to expand on the studies conducted in preparation of the Draft EIS/EIR. It should be noted that prior to conducting the comparative study, the Santa Monica Boulevard Station location was shifted slightly to the east from the location in the Draft EIS/EIR to avoid the Santa Monica Fault zone.

The geotechnical studies conducted during preparation of the Final EIS/EIR concluded that tunneling can be safely carried out beneath the Beverly Hills High School campus and the West Beverly Hills, Century City, and Westwood neighborhoods. However, these studies also determined that the Century City Santa Monica Station would cross the West Beverly Hills Lineament, a northern extension of the active Newport-Inglewood Fault, which poses a significant safety risk to passengers at this station location. No evidence of faulting was found at the proposed Century City Constellation Station site.

In addition, the Century City Constellation Boulevard Station has the best pedestrian environment, can be expected to attract the most transit riders, and is centrally located to help shape the redevelopment of Century City as an important transit-oriented destination on the Westside Subway Extension. Further refinements to the ridership analysis concluded that the Century City Constellation Station would result in 3,350 more boardings along new Westside Subway Extension stations than the Century City Santa Monica...
Station due to proximity to jobs and residences within the critical 600-foot and 1/4-mile walksheds.

Based on all of these factors, the Century City Station Location Report concluded by recommending that the Century City Station be located along Constellation Boulevard due to seismic safety concerns at the Santa Monica Boulevard Station and higher ridership projections with Constellation Boulevard Station.

Please refer to Sections 2.3, 2.4, and 2.5 of the Final EIS/EIR for an overview of the development of alternatives, including station locations, and the LPA selection process. The Westside Subway Extension Alternatives Screening and Refinement Following Scoping Report provides a more detailed description of the refinements to station locations following Draft EIS/EIR scoping in response to community comments and engineering requirements. In addition, please see the Westside Subway Extension Station Entrance Location Report and Recommendations and the Westside Subway Extension Acquisitions and Displacement Supplemental Report for information on the station entrance location for Century City Constellation and any associated property acquisitions. Please refer to Section 8.8.2 and 8.8.3 of the Final EIS/EIR for more detailed responses to concerns related to the Century City Station. Refer to Section 7.3 of the Final EIS/EIR and the Westside Subway Extension Century City Station Location Report for a comparison of the two Century City Station locations. The results of further geotechnical investigations in the Century City vicinity can be found in the Westside Subway Extension Century City Area Fault Investigation Report and the Westside Subway Extension Century City Area Tunneling Safety Report. The results of further ridership studies can be found in the Westside Subway Extension Technical Report Summarizing the Results of the Forecasted Alternatives and the Westside Subway Extension Century City TOD and Walk Access Study. All reports are available on the Metro Westside Subway Extension Project website: www.metro.net/projects/westside/westside-reports.
Please see section 4.17 of the Final EIS/EIR for a discussion of cumulative impacts the SCAQMD’s very stringent 100 lbs/day construction threshold. Construction impacts and mitigation are discussed in section 4.15 of the Final EIS/EIR. The following mitigation measures would be implemented to reduce construction related impacts:

- **CON-52—Measures to Reduce Gas Inflows**
- **CON-51—Techniques to Lower the Risk of Exposure to Hydrogen Sulfide**
- **CON-20—Spillage Prevention for Earthmoving Equipment**
- **CON-19—Spillage Prevention for Non-Earthmoving Equipment**
- **CON-18—Street Watering**
- **CON-17—Fugitive Dust Control**
- **CON-16—Dust Control During Transport**
- **CON-15—Reduce Street Debris**
- **CON-14—Measures to Reduce the Predicted PM_{10} Levels**
- **CON-13—Placement of Construction Equipment**
- **CON-12—Use of Best Available Emissions Control Technologies**
- **CON-11—Prohibit Tampering of Equipment**
- **CON-10—Maintainence of Construction Equipment**
- **CON-9—No Idling of Heavy Equipment**
- **CON-8—Monitoring and Recording of Air Quality at Worksites**
- **CON-7—Meet SCAQMD Standards**
- **CON-6—Meet Mine Safety (MSHA) Standards**

Your comment has been noted. As stated in the Westside Subway Extension Air Quality Technical Report and as summarized in the Final EIS/EIR, SCAQMD threshold levels would be exceeded under certain activities during the construction phase of the project. These threshold levels would not be exceeded during the operational phase of the project. See the response to comment 534-1 above for a list of mitigation measures that would be implemented during construction to reduce impacts.

Your comment has been noted. The mitigation measures listed in response to comment 534-1 above will be applied to help reduce the amount of NOx generated during construction. The mitigation measures however do not achieve an emission level below the SCAQMD’s very stringent 100 lbs/day construction threshold.

Please see section 4.17 of the Final EIS/EIR for a discussion of cumulative impacts.
regarding particulate matter.
Your comment regarding the construction schedule has been noted. As stated in the technical report, the construction schedule was based on the information available at that time. The analysis has been refined in the Final EIS/EIR to reflect updated construction information. Please see section 4.15 of the Final EIS/EIR for more information.

Your comment has been noted. As stated in the technical report, nitrogen dioxide (NO2) is a brownish gas that irritates the lungs. It can cause breathing difficulties at high concentrations. NO2 is not directly emitted but is formed through a reaction between nitric oxide (NO) and atmospheric oxygen. NO and NO2 are collectively referred to as nitrogen oxides (NOx). Therefore NOx references encompass NO2.

Your comment has been noted. As shown in the operational air quality analysis in Section 4.4 of the Final EIS/EIR, particulate matter levels are not predicted to be above the SCAQMD significance thresholds at any location along the route.

Your comment has been noted. Information about air toxics can be found at: http://www.epa.gov/ttn/atw/allabout.html and http://www.arb.ca.gov/toxics/id/taclist.htm.

The Westside Subway Expansion Project will be (partly) funded through the Federal Transit Administration (FTA) New Starts Program. The FTA discretionary New Starts program is the federal government’s primary financial resource for supporting locally-planned, implemented, and operated transit “guideway” capital investments. The Safe, Accountable, Flexible, Efficient Transportation Equity Act: A Legacy for Users (SAFETEA-LU) directs FTA to evaluate and rate candidate New Starts projects as an input to federal funding decisions and at specific milestones throughout each project’s planning and development. SAFETEA-LU further supports a comprehensive planning and project development process which New Starts projects must follow. Planning and project development for New Starts projects is a continuum of analytical activities carried out as part of metropolitan systems planning and the National Environmental Policy Act of 1969 (NEPA) review processes.

FTA evaluates and rates New Starts projects for several specific reasons:

- To approve project entrance into preliminary engineering
- To approve project entrance into final design
- As an input to development of the US Department of Transportation’s annual New Starts budget request. FTA’s ratings are included in the Annual Report on Funding Recommendations, which is submitted to Congress each spring.
To execute a full funding grant agreement (FFGA).

At each evaluation the project scope, schedule, and cost, are subject to intensive reviews, through a series of Oversight Procedures (OP), which culminate in a Project cost risk assessment.

The results of completed risk assessments are evaluated to determine:

- The grantee’s predicted adherence to the proposed budget and schedule
- Risks and opportunities facing the project that should be addressed during the final design phase
- The grantee’s risk management plan and whether it is being implemented as planned
- The grantee’s project development plan
- Whether the Grantee has incorporated a risk-bases management approach to project development

The FTA’s review under the OP is a critical input to FTA’s decision regarding the project advancement and funding.

Through the Project risk assessment the FTA identifies, describes and analyzes the adequacy of LAMTA’s cost contingency provisions and establishes a tabular and graphical Cost Contingency Curve that indicates minimum levels of contingencies that must be maintained across the duration of the project for each of the FTA’s milestones. The established minimum contingency values are then incorporated into a Risk and Contingency Management Plan (RCMP) which is then utilized by the FTA to monitor LAMTA’s performance in managing the allocated project contingency values. The RCMP further includes LAMTA’s plans to recover in those cases where cost estimate forecasts indicate contingency values have fallen below the minimum planned contingency values, including as necessary implementation of a formal Recovery Plan or adjustment of expected project final cost with the FTA.
Appendix H - Response to Comments

2. The draft EIR is incomplete with respect to the annual operating and maintenance costs. The information is incomplete without estimates of revenues, and allocable direct and indirect overhead and the assumptions used in developing the data. Additionally, the report should have included financial statements and footnotes so the public could estimate the likelihood of MTA meeting both their construction and cost projections.

3. The draft EIR is incomplete because it failed to analyze the effect of the Westside subway extension on other development projects. I hypothesize that the Westside subway will divert many of the skilled construction workers who would otherwise work on other projects. I also hypothesize that MTA would accumulate most of the construction steel, cement and other materials that would otherwise be available to other projects. With those issues, many pending projects could fail causing extreme hardships for their employees, lenders and owners. Metro has a responsibility to make their supplies and employees available at their cost to the other development projects occurring on the Westside during the subway construction period. Also, the EIR didn't adequately explain whether the construction workers for multiple sites are already residing in the Westside. If they must drive in from outlying areas then they will add to the traffic congestion, not relieve it. They will also be a burden and nuisance on available parking. Please comment on whether construction workers should be required to use Metrorail, metro link or buses to commute to their assignments.

How many total workers, including employees, contract employees, and subcontract employees will be working on this construction project during any weekday 24 hour period? How many total workers will be working on weekends?

4. Is there a need for this Westside subway train? By Metro’s own admission, they expect less than a 1% decrease in automobile traffic by 2035. I think that’s optimistic. The people who will ride the train are the ones who ride the bus now. Some will arrive at work a little faster. Since there are fewer stations than bus stops, some passengers will have longer walks to the stations, or from the station to their ultimate destinations. Shouldn’t the highest need be the conversion of auto drivers to rail passengers?

5. Please note that the 8 mile Crenshaw Expo line light rail, with an original price tag of $640 million, is now projected to cost over $900 million and will only complete 5 ¾ miles. The expo is a surface train and didn’t have the complications of tunneling, excavating and dealing with the variety of environmental problems that the Purple line can expect. Also, Metro expects to be working on multiple sites at the same time, making it more difficult to adjust to problems as they arise. Using more workers is good politics but it increases the learning curves and produces a more costly, inefficient project.

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Work on station construction is expected to follow a Monday-Friday work week and the work in tunnels a six day work week. There are three tunneling work sites planned with approximately 150 hourly workers at each location.

Your comments about the need for the project have been noted. As stated in Chapter 1, Purpose and Need of the Final EIS/EIR:

Recent studies of the Study Area to be served by the proposed project revealed the need for transportation improvements including mobility options to meet the increasing travel demand. The purpose of the Westside Subway Extension Project is to improve transit travel time, provide more reliable transit service to the 286,246 transit riders who access the Study Area today. More specifically, the project purpose is to:

- Improve Study Area mobility and travel reliability;
- Improve transit services within the Study Area;
- Improve access to major activity and employment centers in the Study Area;
- Improve opportunities for transit supportive land use policies and conditions;
- Improve transportation equity;
- Provide a fast, reliable, and environmentally-sound transit alternative; and
- Meet Regional Transit Objectives through SCAG’s Performance Indicators of mobility, accessibility, reliability, and safety.

The need for the project is demonstrated throughout Chapter 1, through the discussions on population and employment, the high number of major activity centers, high transit usage, and severe congestion. In general, the Study Area currently has, and is projected to have, large population and employment centers scattered throughout 15 existing major activity centers in the corridor. These activity centers are served by extremely congested road networks that will deteriorate further with the projected increase in population of 51,000 (10.1 percent) and the 58,000 additional jobs in the corridor (a 12.1 percent increase) by 2035. This anticipated growth will further affect transit travel speeds and reliability, even with a dedicated lane for express bus service on Wilshire Boulevard. By 2035, buses will travel at speeds ranging from 8 to 11 miles per hour (mph). The Study Area currently has high transit usage—hundreds of thousands of transit riders every day. This high level of transit usage will increase by 29 percent between 2006 and 2035 (from 286,246 to 370,520). The improved capacity that would result from the subway extension is the best solution to improve travel times and reliability for the 29 percent increase in transit riders between 2006 and 2035 (from 286,246 to 370,520), and to provide a high-capacity, environmentally-sound transit alternative.

Information on how the Build Alternatives would affect travel is presented in Chapter 3, Transportation, of the Draft EIS/EIR for the region and study area. The Draft EIS/EIR also presents a detailed examination of model results for 2035 that provide further insights on potential impacts of the No Build and Build Alternatives, specifically in terms of reduced
auto trips during the seven-hour peak period. It is recognized that the Build Alternatives would result in relatively small percentage decreases in trips. However, under Alternative 2 (Westwood/VA Hospital Extension), approximately 12,000 auto trips occurring in the seven-hour peak period would be eliminated. In addition, the Project would provide a highly attractive public transportation alternative for Westside residents, workers, and visitors—particularly in terms of travel times. Chapter 3 of the Final EIS/EIR presents updated transportation impacts for the LPA.

The project is not intended to be a major jobs generator, rather a mobility enhancement for people traveling to/from the Westside for jobs, schools, entertainment, shopping, and other activities. The project will create jobs but that is not the main purpose as stated above. The project will provide the opportunity for people from all over Los Angeles County and beyond to access the Westside for a multitude of purposes through linkages to other rail and bus lines.
Your comments about a better route for the Westside Subway Extension Project and other technologies have been noted.

The Metro Westside Extension has been an integral element of local, regional, and federal transportation planning since the early 1980s. Extending westward from the Los Angeles Central Business District (CBD), the Westside Extension has been the subject of in-depth technical studies and extensive community involvement during this period. Ultimately, the transit investment has been envisioned to extend toward Beverly Hills, Century City, Westwood (UCLA), West Los Angeles, and Santa Monica. This corridor was identified as one that has a tremendous need for a high-capacity transportation improvement project.

During much of the same time, Metro has conducted studies on other corridors in the Los Angeles region, including: Orange Line BRT; Exposition Light Rail Transit Project Phases 1 and 2; Metro Gold Line Foothill Extension; Metro Regional Connector; Metro Gold Line Eastside Extension Phase 2; Crenshaw/LAX Transit Corridor Project; and the South Bay Metro Green Line Extension.

With regard to your comment about a monorail, it should be noted that monorail technology was considered during the Alternatives Analysis (AA) Study for the Westside. During Early Scoping meetings, Metro presented the public with technology options that included Heavy Rail Transit (HRT), Light Rail Transit (LRT), and Bus Rapid Transit (BRT). In response to comments received, Metro added a monorail to those other technologies to be analyzed in the AA Study. As a result of these analyses, the Metro Board decided to carry five subway alternatives into the Draft EIS/EIR. An underground alignment was recommended because it has fewer land use, traffic, visual, historic and noise impacts than an elevated alignment. This is due to the impacts an elevated alignment would have on adjacent buildings (some historic), visual quality, shadow, noise, land acquisitions and traffic, as well as the mitigations needed. The AA Study also identified HRT as the preferred mode for further study because it has the capacity to meet the anticipated ridership demand and would minimize the number of transfers.

With regard to your comments on economic justice, please refer to Section 4.2 of the Final EIS/EIR. This section discusses the potential environmental justice issues related to the Project. The purpose of the Project itself is not intended to be a job creator as discussed in the response to comment 534-11 above. Rather, the project is primarily intended to provide an enhanced and high-capacity transportation improvement for the Westside, which would benefit individuals coming from all parts of Los Angeles County through direct connections to the Metro Gold Line Eastside, Metro Blue Line, Metro Green Line, and other communities served by bus and rail. This enhanced mobility would provide the opportunity for all individuals to access jobs in the Westside from these other areas.

 shouldn't the project be more than just a major jobs generator of a make work project? Do the people of California and the United States deserve better for their $10,000,000,000?

534-12

There are better route choices to accomplish the highest need.

The green line light rail is somewhat near LAX but too far to reach without bus or taxi. A green line light rail that ends within LAX would be more attractive. Similarly, the red line ends in North Hollywood. It should have been extended to Burbank Airport as a monorail, not a subway.

The most important opportunity for removing automobiles would be a monorail following the 405, but large park and rides would need to be available in order to attract users. Similarly, the 101 is also a more attractive site for a monorail. I have seen numerous newspaper articles that all seem to agree that the monorail's building costs are only 10% compared to heavy track subways. Also, it is more feasible build extensions to adjust the route if there are major changes in the location of work sites, schools, shopping or residential living.

Another concept discussed in the draft EIR was economic justice. That is regardless of the drawbacks, it is important to make jobs for minority workers. If that is a primary goal, it would be more important to design those jobs so that the money is put back into the minority community. That will not happen if the workers are stationed near Westwood, Century City, Beverly Hills, Beverly Center or the Grove.

534-13

Thank you for allowing me to be part of the public process. Under the California Public Records Act I am requesting a list of the people who responded to your request for public comment. Please advise me first of the cost involved.

Glenn Flug
glenn.flug@yahoo.com

Glenn Flug
Kaufman & Kabani
800 S. Figueroa Street, suite 900
Los Angeles, Ca. 90017
213-488-6180 x125
Your comment has been noted. A list of those who submitted a comment during the public comment period is available as part of Appendix H of the Final EIS/EIR.
Your comment in opposition to the Westside Subway Extension Project has been noted. On October 28, 2010, the Metro Board of Directors identified Alternative 2 (Westwood/VA Hospital Extension) as the Locally Preferred Alternative. Only Alternatives 1 and 2 are affordable within the adopted Long Range Transportation Plan, and between them, Alternative 2 provides higher ridership and improved cost effectiveness. Additionally, Alternative 2 serves the VA Hospital and other communities west of the I-405 more effectively.

Please refer to Sections 2.3, 2.4, and 2.5 of the Final EIS/EIR for an overview of the development of alternatives and the LPA selection process.

Your comments regarding financial feasibility have been noted. Chapter 6 of the Final EIS/EIR presents a financial plan for the project and identifies other project funding sources. If the project is over budget once Metro and the FTA enter into a Full Funding Grant Agreement, additional funds would need to be provided from local sources possibly including Measure R.

Your comments about the traffic congestion reduction related to the Project have been noted.

The Westside Extension Study Area contains some of the most congested arterial streets in the County. Any approach to resolving the significant traffic congestion in the County, and for purposes of this study of congestion in the Study Area, needs a multi-modal approach. While there are freeway, arterial, and bus improvement projects planned within the Study Area to address mobility, no one project alone can reduce the extraordinary levels of congestion in the Westside and each has trade-offs and environmental consequences in its implementation.

Chapter 1 of this Final EIS/EIR details the Purpose and Need of the Project. As described, a major purpose of the Westside Subway Extension is to improve transit speed and reliability for the Study Area and, in particular, to provide enhanced mobility that will not be affected by freeway and arterial congestion levels. The improved capacity, speed, and reliability that will result from the subway’s exclusive guideway, offer the best solution to improve travel times, generate the projected 29 percent increase in transit riders in the study area between 2006 and 2035 (from 286,200 to 370,500), and provide an environmentally sound transit alternative.

Given the future conditions of the freeways, arterials, and travel speeds, the Westside Subway Extension provides benefit. Significant increases in travel are expected in the...
future and no major new highways or arterial widenings are planned. Without the subway, traffic congestion will be worse in the future. The Westside Subway Extension Project will provide significant new capacity to accommodate increases in travel demand but it will not, by itself, be sufficient to significantly reduce surface traffic congestion on the Westside.

This Final EIS/EIR presents a detailed examination of the travel-demand projections for 2035, which provide further insights on potential impacts of the LPA, specifically in terms of reduced auto trips during the seven-hour peak period. It is recognized that the LPA will result in a relatively small percentage decrease in trips. But, under the LPA, approximately 12,000 auto trips occurring in the seven-hour peak period will be eliminated. In addition, the Project will provide a highly attractive and viable public transportation alternative for Westside residents, workers, and visitors; particularly in terms of travel times and reliability.

Please refer to Section 8.8.9 of the Final EIS/EIR for a more detailed response to traffic congestion reductions. Information on how the LPA would affect travel in the region and Study Area is presented in Section 3.4, Section 3.5 and Chapter 7 of the Final EIS/EIR. The Westside Subway Extension Technical Report Summarizing the Results of the Forecasted Alternatives provides a summary of the updated travel forecast results for the Final EIS/EIR. All reports are available on the Metro Westside Subway Extension Project website: www.metro.net/projects/westside/westside-reports.

Your comments about construction impacts and the justification for a .57 percent of .63 percent reduction in traffic congestion have been noted. Please see the response to comment 453-3 above regarding traffic congestion.

Construction impacts of the Project will be temporary and limited in areas as construction proceeds along the length of the Locally Preferred Alternative. Metro will coordinate with affected residents and businesses prior to construction. A detailed survey of community stakeholders and businesses will be conducted. A construction safety campaign will be developed and community response protocols (notification of construction activities, hot lines, etc.) will be produced. A public involvement plan will be developed prior to each construction phase and will be tailored to the construction phase. Metro will maintain the Project website, which will provide information to the public regarding construction phasing. Metro will develop a program tailored for different locations and needs. The program will involve signage and marketing to assistance to businesses, identification of parking alternatives, and other measures.

Metro also considers the cumulative impact of multiple projects in the Study Area under construction at the same time as the subway extension. Careful coordination will occur with local jurisdictions to ensure that potential impacts from the simultaneous construction of multiple projects are addressed and mitigated to the extent feasible.
Traffic impacts associated with LPA construction include reduced roadway traffic lanes and temporary street closures that could result in major traffic disruptions and bottlenecks. These impacts are associated with contractor work and storage areas, stations, crossovers, mining entry/exit locations, TBM operations and support activities, truck haul routes, transportation of oversized construction materials, station entrances, station appendages, grout injection, and drop holes for the LPA and are detailed in Section 3.8.2 of this Final EIS/EIR.

Subway stations are built by excavating the site for the station box and then building the station below ground. If the station is built under a street, it is covered over with concrete decking during construction to allow traffic to continue to flow overhead. Traffic will be disrupted at the beginning of station construction to allow for initial excavation and installation of the concrete decking, and again at the end to remove the decking and reconstruct the street. Section 3.8 details the traffic-control activities during station construction and the duration of each activity.

Street closures will be coordinated with local jurisdictions and the maintenance of traffic lanes during construction will follow local agency requirements and standards with respect to minimum lane widths, the number of available travel lanes, and the duration of temporary lane closures. Specific street closure locations will be identified in close coordination with local agencies during the final design phase.

To minimize impacts to traffic circulation, the following mitigation measures will be implemented during construction:

• TCON-1—Traffic Control Plans
• TCON-2—Designated Haul Routes
• TCON-3—Emergency Vehicle Access
• TCON-4—Transportation Management Plan
• TCON-5—Coordination with Planned Roadway Improvements

T-CON-2, TCON-3, TCON-4, TCON-5 were added during this Final EIS/EIR phase based on additional analysis of construction impacts on traffic circulation and concerns raised by the public. With implementation of the mitigation, construction-related adverse effects on traffic circulation will be reduced for adjacent commercial areas and residential neighborhoods. Although the construction impacts on traffic circulation identified will be temporary, impacts and/or residual impacts after mitigation will remain significant and unavoidable during the construction period.

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
- 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

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. Construction will have temporary impacts on communities, including commercial and industrial businesses, particularly those near or adjacent to construction sites. Street closures are expected to impact mobility and access to community facilities, as much of the construction activity will be centered on Wilshire Boulevard, which is a central point of access for the neighborhoods. Sidewalk space may be obstructed temporarily for station and alignment construction, thereby reducing business access but additional access will be maintained to businesses and residences at all times. In addition to temporary street and sidewalk closures, construction activities will also reduce on-street and off-street parking. This could affect access to and profitability of existing businesses as customers may choose to avoid ongoing construction. Business impacts could also include reduced visibility of commercial signs and business locations.

These construction impacts to neighborhoods and communities will be temporary adverse impacts.
impacts, but the following mitigation measures will reduce the adverse effects for all adjacent neighborhoods:

- 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

With implementation of these mitigation measures, there will be no adverse effect to communities or neighborhoods during construction. All residents and businesses displaced as a result of the LPA will be given advance written notice and will be informed of their eligibility for relocation assistance and payments under the Uniform Relocation Assistance and Real Property Acquisition Policies Act. In areas where the subway operates under private property, Metro will work with the property owner to secure a subsurface easement. The following mitigation measures will be implemented to ensure just compensation for acquisitions and easements:

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

Refer to Section 4.15 of the Final EIS/EIR for more detailed information on construction impacts and mitigation measures, including noise and vibration impacts. Refer to Section 3.8.2 of the Final EIS/EIR and the Westside Subway Extension Construction Traffic Analysis Report for more information on haul routes and street closures and traffic congestion during construction. All reports are available on the Metro Westside Subway Extension Project website: www.metro.net/projects/westside/westside-reports.
Westside residents will not benefit from this project. The destination centers are already served by the transit system. Beverly Hills, Century City, Wilshire Corridor and Westwood are already overbuilt.

EIR-Page S-41: states that “growth forecasted in study area may provide opportunities for transit-oriented development around stations.” The highest growth is projected to occur near Wilshire/Fairfax, Wilshire/Rodeo and Westwood/UCLA stations. The development here is too dense already. There are numerous high rise condominiums, apartments, office buildings, hospitals, university, and shopping centers. Westside residents do NOT want more development around these destination centers. There are already large building projects planned just west of the Wilshire/Santa Monica intersection on the site of the old Robinson’s May building. A site on Little Santa Monica near Century City was cleared. A site by Avenue of the Stars and Constellation was cleared. These sites have not yet been built, possibly due to loss of financing because of the economy. A major overhaul of the Century Plaza Hotel is planned, turning a portion of it into condominiums and adding two new towers behind the hotel. The subway promoting more of this will only create more congestion and density. The Westside cannot realistically support this. The development should be spread out more so that people can work closer to where they live, which includes the suburbs. Then and only then will they have reason to abandon their cars. They will not have to commute from Palmdale, Santa Clarita, Thousand Oaks, Riverside, etc.

EIR-Page S-5: The EIR lists a projected increase in population of 51,000 (10.1%) and 58,000 additional jobs (a 12.1% increase) by 2035. I believe that these figures are erroneous and do not take into consideration the continued very high unemployment rate, foreclosures, and lack of new jobs. Companies are not hiring new workers due to the effects of the recession which officially ended in June of 2009. Also, younger couples are delaying having children for financial reasons. Many years of subway construction will cause building tenants to move out of the area and damages to restaurant and service businesses that depend on those tenants.

EIR-Page S-7 states that “The Wilshire Corridor route is the heaviest used bus corridor in Southern California with nearly 60,000 daily boardings (line 20/720/920…” We have noticed that during rush hour, one bus is full, and the bus following directly behind it is empty. The bus schedules and routing should be reexamined to better utilize existing buses and provide shorter wait times for riders. That will allow more riders to utilize the currently empty buses.

EIR-Page S-34-35 states that the Alternatives terminating at Westwood are rated medium high. Riders would need to transfer between rail and bus.

EIR-Page S-35 states that 40% of the project justification rating is a function of transit oriented land use. As stated above, the density and congestion in these “activity centers” are already too high. The result of this subway extension is to create years of disruption of EXISTING land use during construction with the tiny reduction in automobile use by 2035. This result does NOT justify the project.

Environmental considerations:

EIR -Page S-36-37 states that each of the five build alternatives would displace one or more properties in order to construct station portals and provide for construction staging. Some business displacement would occur. Several hundred jobs have been identified for displacement but only a small percentage would actually be displaced. EIR discusses impacts during construction including “traffic and access disruptions near station sites, construction noise and emissions nitrogen oxide (NOx) and particulate matter less than 10 micrometers in size (PM 10), temporary removal of parking, visual effects, and haul trucks removing material excavated from the tunnel and station boxes.”

Your comment on growth in the study area has been noted. The proposed project does not include a housing or commercial component. The proposed project is a transit project located within a transit corridor and would provide the opportunity for adjacent mixed-use development containing commercial and residential uses. Since the corridor is located in a dense urban area, most of the opportunity for development would come from the redevelopment of lower-density uses. This is a slow process that would occur over the span of several decades. The discussion of potential secondary growth that could occur as a result of the Project is addressed throughout the Final EIS/EIR. As described in Chapter 4.1 Land Use and 4.16 Growth Inducing Impacts, land use policy is developed and established by the municipal agency where affected properties are located and not by Metro.

Employment and population projections are based on the Southern California Association of Government (SCAG) forecast for 2035. These socioeconomic characteristics of travelers were used in the travel forecasting.

Your comment regarding bus bunching along Wilshire Boulevard has been noted; however Metro consistently reviews bus schedules and routing to determine the best use of resources.

Your comment regarding the rating of alternatives terminating at Westwood has been noted.

Your comments have been noted. Please see the above response to comment numbers, 453-3 regarding traffic congestion, 453-4 regarding construction impacts, and 453-5 regarding growth in the study area.

Your comment identifying construction impacts has been noted. Please refer to response above to comment number 453-4 regarding construction impacts. Refer to Appendix C, Acquisitions, and Section 4.2.2 of the Final EIS/EIR for a list of properties that would be acquired as part of the Project. All residents and businesses displaced as a result of the LPA will be given advance written notice and will be informed of their eligibility for relocation assistance and payments under the Uniform Relocation Assistance and Real Property Acquisition Policies Act. In areas where the subway operates under private property, Metro will work with the property owner to secure a subsurface easement. The following mitigation measures will be implemented to ensure just compensation for acquisitions and easements:
453-9

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

Please see section 4.15 of the Final EIS/EIR for additional information regarding these issues and recommended mitigation measures.
EIR Page S-37 states that “There would be temporary off-street parking loss at Westwood/UCLA and Westwood/VA hospital stations.” Parking is already at a premium in Westwood and UCLA. Motorists drive around and around looking for parking. Where do you plan to have those cars park?

As stated in the EIR there are NO park and rides for any of the station locations. Are garages going to be built? If so, where, and with what money? Many of the side streets have permit only restrictions. You cannot expect people to ride the subway without a park and ride at each station location. This alone precludes this project.

EIR Page S-37 states that there will be temporary traffic impacts, on-street parking loss, and delays for bus transfer and pedestrian bicyclists. By temporary, do you mean 10 years, assuming the federal government comes up with all of the money in advance, or 30 years? Either way, the Westside will become total gridlock DUE TO THE CONSTRUCTION. I was also informed by a representative of the project that if they get the money to do the whole project in 10 years, they will work on construction of the whole extension ALL AT ONCE. That should be fun. For who? Certainly not the residents or the motorists.

The EIR states that subway riders will not want to walk more than one half mile to a subway station. The only people who will use the subway are probably those who already take the bus and will switch if the stations are very close to where they live and work. This will NOT take more cars off the road. People will NOT leave their cars at home to ride the subway without a park and ride.

EIR Page S-37 - Where will the construction staging for each station be located? Please provide street addresses. Where will all of the construction workers, contractors, etc. park at each of the construction sites? Will they be parking on the adjacent streets and in the residential neighborhoods? Where will all of the construction equipment be stored? Please provide street addresses.

EIR Page S-37 - How and when will the traffic and access disruption take place on Wilshire Boulevard and surrounding streets? Please identify the streets and street numbers. How many lanes will be lost on Wilshire Boulevard and where during construction? You cannot say that it will be determined later. The neighborhood residents are entitled to this information now. Also how many turn lanes will be lost, and where? Identify these intersections.

Where are the office workers, restaurant workers, college students, etc. going to park during construction, who normally park on many of the adjacent streets and in lot 32 in Westwood? Same above questions for Century City stations and other stations. Are you going to remove permit parking on the adjacent side streets? Are you going to have shared permit parking with non-residents allowed to park on permit only streets? How are you going to keep gridlocked traffic going through Westwood with a lane removed from spilling over to the side streets and residential neighborhood streets? Same question for the other stations.

How much and at what times will 405 freeway access be disrupted by construction lane removal, haul trucks heading to and from freeway on ramps on Wilshire Boulevard and other involved streets?

Are you going to expose people going to UCLA and VA hospitals, as well as motorists, residents and anyone in the area to hazardous emissions (nitrogen oxide (NOx) and particulate matter less than 10 micrometers in size (PM 10) because of this construction? Some of these people could have medical conditions that could be exacerbated by this.

How long will the the delays be for bus transfers and pedestrian bicyclists during construction and at what street locations and crosswalk locations?

Your comments about parking have been noted. Park-and-ride can be an important mode of access to transit. However, these facilities are usually located in low-density areas that lack local bus service feeding the stations. That is not the case with this Project. Therefore, none of the stations proposed as part of the Project will provide parking.

The provision of park-and-ride facilities would be inconsistent with the purpose and need of the Project. The Project Study Area is already very congested and Metro seeks to discourage people from driving to access the subway. Park-and-ride facilities also could lead to increased auto use and potentially result in traffic impacts at intersections.

The provision of park-and-ride facilities also would be inconsistent with both the existing built environment surrounding stations and efforts to encourage transit-oriented development. The Project corridor is very dense due to medium and high density commercial and residential development. The construction of park-and-ride facilities would consume space that could be put to more productive residential and commercial uses.

Any added park-and-ride facilities would have major implications on Project costs. The study area also has very high land costs and there is lack of available parcels for park-and-ride development. Due to land costs and scarcity, any parking would need to be in multi-story garages, resulting in substantially higher capital costs than current estimates.

Your comment regarding parking during construction has been noted. Contractor staging areas (also referred to as “laydown areas”) will be necessary for tunnel construction, stations, and ancillary facilities. Off-street space will be needed for setup, insertion, operation, and extraction of equipment and materials to the tunnel and station excavations. Section 2.6 of the Final EIS/EIR identifies the locations of the laydown areas.

Work areas will be needed to support tunnel excavation operations, including processing and removing tunnel spoils (excavated materials), handling precast concrete tunnel-lining segments, and tunnel utilities (such as ventilation, water supply and return, and power supply). In-street work areas will only be used when no off-street alternatives exists. Temporary easements, typically a portion of the sidewalk, traffic lanes, and/or parking areas, may be required at various locations for staging. 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 (On-Street and Off-Street), and Westwood/VA Hospital Stations (North and South). The following mitigation measures will be implemented to minimize impacts to parking during construction:

- TCON-7—Parking Management
- TCON-8—Parking Monitoring and Community Outreach
However, even with the implementation of these mitigation measures, a temporary adverse and unavoidable parking impact will remain during construction.

Please see the response above to comment number 453-4 above regarding traffic construction impacts.

The Final EIS/EIR evaluates the impacts of construction under both the Concurrent Construction Scenario as well as the Phased Construction Scenario.

Please refer to Section 8.8.8 of the Final EIS/EIR for more detailed responses to concerns related to parking. In addition, Section 3.6 of the Final EIS/EIR estimates the demand for parking at the stations and provides an analysis of potential spillover parking impacts to surrounding communities. Please refer to Section 3.8 of the Final EIS/EIR for more detailed information on transportation related construction impacts. In addition, the Westside Subway Extension Construction Traffic Analysis Report provides more information on construction related parking affects and Westside Subway Extension Displacement and Relocation Supplemental Technical Report describes staging areas identified for the LPA and any associated parking losses. All reports are available on the Metro Westside Subway Extension Project website: www.metro.net/projects/westside/westside-reports.

Contractor staging areas (also referred to as “laydown areas”) will be necessary for tunnel construction, stations, and ancillary facilities. Off-street space will be needed for setup, insertion, operation, and extraction of equipment and materials to the tunnel and station excavations. Approximately one acre is necessary for each station construction staging area and up to three acres is necessary for a typical tunnel-boring machine launch site.

Work areas will be needed to support tunnel excavation operations, including processing and removing tunnel spoils (excavated materials), handling precast concrete tunnel-lining segments, and tunnel utilities (such as ventilation, water supply and return, and power supply). In-street work areas will only be used when no off-street alternatives exists. Temporary easements, typically a portion of the sidewalk, traffic lanes, and/or parking areas, may be required at various locations for staging.

The proposed staging areas were addressed as part of the Draft EIS/EIR in the Westside Subway Extension Real Estate and Acquisitions Technical Report, in Chapter 2 and Appendix C of the Draft EIS/EIR. These proposed areas were refined and/or eliminated from further consideration for staging during the preparation of the Final EIS/EIR. The staging areas, including addresses, under consideration for the LPA in the Final EIS/EIR are identified in the Westside Subway Extension Acquisitions and Displacement Supplemental Report, and Section 2.6 and Appendix C of the Final EIS/EIR.
It is important to note that several construction staging site alternatives are under consideration at a few station locations in this Final EIS/EIR. Selection of the construction staging site will consider where the station entrances could be co-located, environmental impacts, and cost, as well as other factors. The decision will be made by the Metro Board of Directors following circulation and public review of this Final EIS/EIR.

TCON-9 in the Final EIS/EIR states that Metro will require all construction contractors to identify adequate off-street parking for construction workers at Metro-approved locations. This will occur for each construction site to minimize additional loss of parking. Metro will work with construction contractors on implementation of adequate off-street parking for construction workers.

All reports are available on the Metro Westside Subway Extension Project website: www.metro.net/projects/westside/westside-reports.

Your comment regarding construction impacts to traffic and parking have been noted. Please refer to the responses above to comment number 453-4 and 453-10.

Your comment regarding traffic impacts during construction has been noted. Please see response above to comment number 453-4.

The closures to the 405 freeway ramps are dependent on the location of the Westwood/VA Hospital Station. The construction of the South Option would result in temporary ramp closures at the I-405 interchange. For 2 to 4 consecutive weekends, the eastbound Wilshire Boulevard to southbound I-405 on ramp and the southbound I-405 to eastbound Wilshire Boulevard off-ramp would be closed for decking installation and removal. Similar closures will be required for the northbound I-405 ramps on the south side of Wilshire Boulevard to construct the crossover box located at the West Los Angeles Federal Building (General Services Administration). Both the North and South options would require temporary closures to the Wilshire Boulevard on- and off-ramps to I-405 for Bonsall Avenue—2 to 4 consecutive overnight/weekends for the North and 8 to 10 weekends for the South—for decking installation and removal. Mitigation measures will be put in place to provide alternate routes for traffic during these closures.

Your comment regarding air quality during construction has been noted. SCAQMD thresholds will be exceeded for all pollutants when the total project emissions over the duration of the construction period are accounted for. 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 (NOx) thresholds will be exceeded for all construction elements. NOx levels will be elevated due partially to the proposed use of diesel locomotives to extract soil during the tunnel boring process. The following mitigation measures will be implemented to reduce air quality 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
- 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

Although the air quality impacts will remain significant and unavoidable during construction, in the long-term, the result in air quality benefits, reducing emissions of some criteria pollutants. Please refer to Section 4.15 of the Final EIS/EIR for a detailed description of air quality construction impacts and mitigation.

Your comment regarding the impacts of construction to pedestrians, bicyclists and bus networks has been noted. Section 3.8 of the Final EIS/EIR includes an analysis of construction impacts to these networks. During construction, pedestrian and bicycle access in and around construction work sites will be temporarily impacted as a result of street and sidewalk closures and disruptions to bike routes. In addition, 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. The following mitigation measures will be implemented to reduce impacts:

- TCON-6—Temporary Bus Stops and Route Diversions
- TCON-10—Pedestrian Routes and Access
- TCON-11—Bicycle Paths and Access

Please refer to Section 3.8 of the Final EIS/EIR for details on construction impacts to these...
networks.
Your comments regarding parking have been noted. Please refer to response above to comment number 453-10 regarding parking facilities.

The Final EIS/EIR evaluated the station locations without the provision of dedicated parking and estimated what the parking demand might be at the stations. A follow-up study was carried out of available public and private parking that may already exist in station areas that could be shared for subway purposes. The results of this study have been incorporated into Section 3.5 of the Final EIS/EIR. Any future parking management initiatives in stations areas would be coordinated with local jurisdictions.

Your comment regarding traffic congestion at stations due to passengers accessing the station has been noted. 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.

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 due to passengers accessing the station. This analysis concluded that the LPA will not negatively impact any analyzed Study Area intersections with the exception of the Beverly Drive and Wilshire Boulevard intersection if the Wilshire/Rodeo Station entrance is constructed in the Bank of America Building. However, if the Wilshire/Rodeo Station entrance is constructed at either Union Bank or Ace Gallery, the recommended location, no traffic impacts along major arterials will be incurred. At minor intersections, the impact of split phases of signals and loss of twin lanes would incur significant impacts. The residents of Westwood want to know to WHERE these traffic impacts would be identified in close coordination with local agencies during the final design phase. Please refer to Section 3.8 of the Final EIS/EIR and the Westside Subway Extension Construction Traffic Analysis Report for more information on proposed street closures. All reports are available on the Metro Westside Subway Extension Project website: www.metro.net/projects/westside/westside-reports.
Your comment has been noted. Following completion of the Project, if physical damage to haul routes was found, affected roads would be treated in a manner that would return affected facilities to pre-construction conditions. This work would restore the street or ground surface to its original condition, or better. Site restoration operations would closely follow completion of the station structures. To maintain traffic flow, one-half of a street would be restored at a time and/or restoration will occur over weekends to enable an entire street to be temporarily closed to through traffic.

Underground utilities were researched and noted on drawings as part of the conceptual design phase. During preconstruction activities, existing utilities will be more closely inspected and evaluated, including depth, condition and exact location. An operation called “potholing” is typically done to physically locate certain utilities, which can then be appropriately marked or protected. It is necessary to relocate, modify or protect in place all utilities and underground structures that would conflict with excavations.

Where in-place protection is not sufficient, relocation is required. Utility relocations can be done prior to or during construction, depending on the sensitivity of the utility. Shallow utilities, such as maintenance holes or pull boxes, would interfere with excavation work and require relocation. Affected utilities are expected to include storm drains, sanitary sewers, water lines, power lines, gas pipelines, oil pipelines, electrical duct banks and transmission lines, lighting, irrigation lines, and communications such as phone, data and cable TV.

Utility relocations will be coordinated with the utility owner. Relocation and protection of underground utilities will require excavation to the depth of the existing utility line and installation of a replacement utility in a new location. This will occur within the affected ROW and on nearby streets, as required. Utility relocations often entail some form of temporary service interruptions. These are typically planned for periods of minimum use (such as nights or weekends), so that outages have the least impact on users.

Utilities such as high-pressure water mains and gas lines, which could be a hazard during station construction and that are not to be permanently relocated away from the work site, could be removed from the construction area temporarily. Utilities that do not require permanent or temporary relocation can be reinforced, if necessary, and supported in place by hanging from deck beams.

In addition to utility relocations, various new utilities will be installed to accommodate construction needs. These include, but are not limited to, communications cables (including fiber optic lines), electrical duct-banks, drainage facilities, water supply lines and lighting.
traffic, parks and public facilities, and other construction-related effects would be significant during construction." If the 405 freeway widening project is not completed by the proposed start date of the subway extension (which is what date?) then will the start date on the subway extension be pushed back until after the 405 Sepulveda Pass freeway widening project is completed?

EIR-Page S-40: Regarding Bicycle and Pedestrians (construction and operation) EIR states that mitigation includes temporary traffic control zone, install marked crosswalks, as feasible relocate/consolidate bus stops to ensure transfers between bus transit and subway do not require crossing more than one roadway. What other steps will you take to ensure traffic flow? In my experience, traffic control with people standing and directing traffic causes long back-ups. With large numbers of bicyclists and pedestrians from UCLA and lanes out, this could be a very significant problem, especially during construction.

EIR-Page S-42: Regarding displacements — Alternative 1 — TOTAL 277. Please provide the street addresses of each of the 40 full acquisitions. Please provide the street addresses of each of the 5 partial acquisitions. Please provide the street addresses of each of the 12 permanent easements. Please provide the street addresses of each of the 2 temporary construction easements. Please provide the street addresses of each of the 28 permanent underground easements.

Regarding Alternative 2, please provide additional information re street addresses if different from above.

EIR-Page 4-37, Figure 4-20 – Please list each street address for each of the properties included in the Acquisitions and Easements for Alternatives 1 through 5, Figure 4-20.

EIR-Page 4-38, Figure 4-21 – Please list each street address for each or the properties included in the Acquisitions and Easements for MOS 1 and MOS 2, Figure 4-21.

EIR-Page 4-41, Table 4-5 – Please list each street address for each property referenced in this table in the same way that the table is shown, by corresponding named alignment options.

EIR-Page 4-41, Table 4-6 – Please list each street address for each property referenced in this table in the same way that the table is shown, by corresponding named alignment options.

EIR-Page S-42: EIR states that all build alternatives are expected to result in beneficial effects for minority and low income communities (visual enhancement, improved accessibility and improved mobility). More of that could be accomplished by investing in the low income communities by directly investing in the low income communities themselves, many of which are far removed from the intended subway route. Although the funds may be earmarked for transportation infrastructure, that is also lacking in low income communities. Even the poor expo train project would contribute more, if it could be finished.

EIR-Page S-42 re mitigation, Page 4-38. EIR states “For all build alternatives a number of permanent underground easements would be required, including beneath residential properties, but they would not result in displacing or relocating any structures on the surface of the parcels. Therefore, no significant impacts are anticipated.” Why isn’t there a build alternative that does NOT involve permanent underground easements under mature beautiful neighborhoods? It is stated many times in the report that construction and operation will have noise and vibrations. There also could be subsidence. Do you really expect residents to be paid an insignificant amount of money for permanent underground easements and that is the end of it? They won’t even receive a fair market settlement for the value of their entire property so they can at least move elsewhere? What about adjacent properties

453-20

Continuous coordination with LADOT and UCLA will take place throughout the design process to address and identify mitigation measures to maintain traffic, pedestrian and bicyclist movement and minimize disruption during construction. In addition, road closures and worksite traffic control plans will be prepared and reviewed by the City’s Transportation Construction Traffic Management Committee (TCTMC) for adequacy and functionality.

453-21

Your comment on specific locations of property acquisitions has been noted. Please refer to Appendix C, Acquisitions, of the Final EIS/EIR and the Westside Subway Extension Displacement and Relocation Supplemental Technical Report for detailed information, maps, and aerial photos. This technical report is available in the project website, www.metro.net/westside.

453-22

Your comment has been noted. The issues described are outside of the scope of this Project.

453-23

Your concerns about tunneling beneath residential properties has been noted. As part of the LPA selection, the Metro Board of Directors requested the further study of the safety of tunneling under homes and schools. The Metro Board of Directors decided to not include the Constellation South alignment between the Wilshire/Rodeo and Century City Stations as part of the LPA, but to continue to study the Constellation North and the Santa Monica Boulevard alignments. The Constellation South alignment passed beneath more residential properties than the Constellation North or Santa Monica Boulevard alignments. In addition, the Metro Board of Directors decided to not include the West or Central alignments between Century City and Westwood/UCLA as part of the LPA, but to continue to study the East alignment because the East alignment is the most direct and least expensive route between the two stations.

Safety, both during construction and eventual operations, is one of Metro’s highest priorities and is one of the key evaluation criteria in selection of the Locally Preferred Alternative (LPA). On most transit tunnel projects, significant portions of the alignment are constructed adjacent to or beneath buildings. The LPA passes beneath homes and schools in these

Appendix H - Response to Comments
neighborhoods because the curve radius required for subway tunnels is much wider than that required at a typical surface street intersection. The current alignment minimizes tunneling under buildings.

The geotechnical studies conducted during preparation of the Final EIS/EIR concluded that tunneling can be safely carried out beneath the Beverly Hills High School campus and the West Beverly Hills, Century City, and Westwood neighborhoods. The use of state-of-the-art pressurized closed-face TBM's for soft-ground tunneling has greatly improved the control of ground movements such that tunneling can be done with minimal surface settlements. The presence of the tunnels will neither affect the risk to buildings above them during an earthquake nor change the severity of shaking. Finally, tunnels can be constructed and operated safely in gassy grounds and oil wells do not pose an unmitigatable risk to tunneling.

The additional detailed geotechnical studies also assessed soil conditions and determine the potential for noise or vibration impacts on the surface along the refined alignments. These studies concluded that the predicted vibration and noise levels are within the FTA requirements and operation of the subway is not anticipated to have adverse impacts with the implementation of mitigation, including areas where the tunnels pass beneath homes and schools. During construction, low levels of noise and vibration may be experienced for a day or two as each of the two TBM's pass under a given location. In addition, as the tunnels are driven, construction trains bring supplies to and from the tunnel heading. However, these underground construction noises will also be controlled to be within Metro criteria.

Please refer to Section 8.8.4 of the Final EIS/EIR for a more detailed response to geotechnical concerns. The results of further geotechnical investigations in the Century City vicinity can be found in the Westside Subway Extension Century City Area Fault Investigation Report and the Westside Subway Extension Century City Area Tunneling Safety Report. All reports are available on the Metro Westside Subway Extension Project website: www.metro.net/projects/westside/westside-reports.
Appendix H - Response to Comments

Westside Subway Extension
Final Environmental Impact Statement/Environmental Impact Report

March 2012
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nearby but not directly over the actual tunnels? We did not sign up for this when we moved into this neighborhood!

EIR-Page 4-134-135: Since it is stated that CEQA (California Environmental Quality Act) does not provide specific thresholds for noise or vibration impact, this analysis is flawed. What about noise and vibration related to tunneling and dirt removal underground, dirt containers moving back and forth on the tracks? What about noise and vibration as the subway system ages? What about noise and vibration from a derailment, a sudden stop, an accident, an earthquake?

EIR-Page 45: Regarding geologic hazards – Table S-5 states that multiple segments of the Build Alternatives traverse the Santa Monica Fault. The West Beverly Hills Lineament crosses the STUDY Area in the vicinity of the intersection of Moreno Drive and Santa Monica Boulevard in Century City. Alternatives are susceptible to possible surface fault rupture and strong ground shaking generated by nearby faults. In addition, Alternative 3 is subject to fault rupture hazards at three (3) additional locations: 1) Wilshire Boulevard and Bundy Drive 2) Wilshire Boulevard Between Stanford and Harvard Streets, and 3 Wilshire Boulevard between Chelsea and 21st Streets. The mitigation – Table S-5- GEO-2 states that “Potential operational impact from fault rupture (i.e. derailment) to the safety of subway riders cannot be entirely mitigated.” Why is the subway route being run at or so close to this fault? Please provide a clear map of the entire Santa Monica Fault with the neighborhoods and streets clearly shown and identified.

In addition to the safety of subway riders, what about the safety of people, homes and buildings ABOVE the subway? I.e. fire, derailment, explosion, subsidence of/collapse of tunnel causing injury to people above the tunnel, damage to homes and buildings above the tunnel?

The Northridge quake caused very strong shaking and damage to the Westside area. A quake on the Santa Monica fault would probably do so also. The tunneling itself through or in close proximity to a fault could even precipitate a quake. This cannot be ruled out since not even the experts can predict when or how a quake will occur.

EIR-Page S-46 – Liquefaction – Alternative 1 and 2 – “tunnels will be below potentially liquefiable soils. There may be potential adverse effects from liquefaction adjacent to the upper portions of some walls at Wilshire/La Cienega and Westwood/UCLA stations.” Mitigation states “by designing the upper portions of the station walls to resist greater lateral earth pressure.” How great a magnitude earthquake will this be designed to resist?

EIR-Page S-46- Subsidence – The EIR states “No adverse effect. Subsidence is not considered an impact during operations.” Could there be subsidence from tunneling, from earthquake shaking, from a construction accident, from an explosion, from a terrorist attack, from a derailment? If so state what you intend to do about that.

EIR-Page S-47: Subsurface gases Table S-5 – The EIR states that “Hazardous subsurface gasses (methylene and hydrogen sulfide) pose a hazard during construction and operation.” Mitigation includes – comply with City's Methane Mitigation Standards, tunnels and stations would include gas monitoring and detection systems with alarms, as well as special ventilation equipment to dissipate gas. How do you intend to evacuate people from a tunnel that has a high risk of explosion and fire? Are there any exit routes other than at the stations? What if pressure levels change quickly with not enough warning time? What if a derailment occurs? What if a terrorist attack occurs?

EIR – Page S-1: The EIR states that in the early 1990’s “The subway alignment was to have deviated south of Wilshire Boulevard to avoid a federally prohibited methane gas hazard zone ( a zone that was

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EIR – Page S-1: The EIR states that in the early 1990’s “The subway alignment was to have deviated south of Wilshire Boulevard to avoid a federally prohibited methane gas hazard zone ( a zone that was

Your comment regarding noise and vibration during operation has been noted. FTA noise and vibration criteria was applied as the CEQA threshold for significant for the noise and vibration analysis.

Subway tunnels are typically at least 50 to 70 feet below the surface to the track depth. As a result, noise and vibration are not typically noticeable at the surface. In the Beverly Hills, Century City, and Westwood areas, the proposed subway tunnels would generally be deeper than this in the areas where it would pass beneath homes and schools. For example, at Beverly Hills High School, the track depth would be 75-80 feet below the first floor of the school buildings. In Westwood, the track depth is more than 100 feet deep in most places. Since the first segment of the subway opened in 1993, Metro has received no complaints about noise or vibration due to subway operations.

Additional detailed geotechnical studies were conducted during the Final EIS/EIR phase to assess soil conditions and determine the potential for noise or vibration impacts on the surface along the refined alignments. This included measurements at the Beverly Hills High School site and in its buildings, as well as in the residential area between the Century City and Westwood/UCLA Stations.

These studies concluded that the predicted vibration and noise levels are within the FTA requirements, and tunnel operation is not anticipated to have adverse impacts with the implementation of mitigation. Noise from operation of the LPA from such sources as station ventilation system fans, emergency ventilation fans, traction power substations, and emergency generators will be designed to meet the noise-level limits specified in Metro Rail Design Criteria and will not result in any noise impacts. There are no vibration-sensitive receivers along the LPA that are predicted to exceed the FTA ground-borne vibration criteria.

Three locations along the LPA were identified 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. These locations are the Wilshire Ebell Theatre, an apartment building on Wilshire Boulevard at Orange Drive, and the Saban Theatre. To mitigate the potential for ground-borne noise impacts at these three locations, the following mitigation measures will be implemented:

- **VIB-1**—High compliance direct-fixation resilient rail fasteners will be incorporated into the design of the trackwork at the Wilshire Ebell Theatre and the Saban Theatre, which will reduce ground-borne noise by 5 to 7 dBA.
- **VIB-2**—A low impact crossover such as a moveable point frog or a spring-loaded frog will be used in the design of Wilshire/La Brea No. 10 double crossover for the apartments, which will reduce ground-borne noise by 5 to 6 dBA.
With these mitigation measures, there are no vibration-sensitive receivers that are predicted to exceed the FTA ground-borne vibration criteria during operation. Mitigation measure VIB-2 was added subsequent to the Draft EIS/EIR due to the additional studies conducted during preparation of this Final EIS/EIR.

Should future underground construction be considered that would place a school building foundation closer to the tunnel, mitigation measures could be implemented to reduce ground-borne noise and vibration impacts. To mitigate such noise impacts, a high-compliance direct-fixation resilient rail fastener can be incorporated into the track work. Metro will perform routine maintenance on the system, so noise and vibration will not be a problem as the system ages.

Your comment regarding noise and vibration during an event has been noted. The presence of the tunnels will neither affect the risk to buildings above them during an earthquake nor change the severity of shaking.

During construction, 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
- CON-28—Comply with Local Noise Ordinances
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.

Results of these additional noise and vibration analyses and mitigation measures can be found in Section 4.6 of this Final EIS/EIR and the Westside Subway Extension Noise and Vibration Study. All reports are available on the Metro Westside Subway Extension Project website: www.metro.net/projects/westside/westside-reports.

Your comment about seismic safety has been noted. The LPA, as with most sites in southern California, is susceptible to strong ground shaking generated during earthquakes by nearby faults. At least one segment of the Santa Monica Fault crosses the LPA. In addition to the Santa Monica Fault, the West Beverly Hills Lineament (WBHL)/Newport-Inglewood Fault Zone crosses the LPA in the vicinity of Moreno Drive in the Century City area. However, many underground facilities—subway tunnels, sewers, and storm drains—have been built in Los Angeles and throughout California near and across active fault lines.

The hazards from an earthquake include fault rupture (cracking/fracturing of the ground where one side of the fault moves relative to the other), shaking, and other secondary effects. While the hazard due to shaking can be designed against, the hazard due to fault rupture is potentially much more severe, but is also much more limited in area, being confined to the specific zone of rupture. Because surface fault rupturing is generally confined to a relative narrow zone of tens to several hundred feet wide, avoidance is often a practical means of avoiding surface fault rupture hazards for facilities such as stations. Furthermore, since subway stations are structures for human occupancy, they should not be built on active fault/deformation zones because of life/safety concerns expressed in state regulations and in Metro Design Criteria.

However, for linear facilities such as tunnels, avoidance may not be possible. Design will allow for the tunnels to cross the faults as perpendicular as possible to the fault line to limit the area of potential damage. Tunneling or building stations along an active fault in a parallel direction is generally not recommended and is in some instances prohibited by State law. Depending on the predicted fault off-set and area over which the movement is distributed, some distortion may be accommodated by the structure. Special designs, such as larger tunnel diameters and enhanced tunnel linings, are employed when crossing fault zones to reduce the risk of damage and allow for a relatively swift return to regular operations should fault displacement take place at a tunnel crossing. The Metro Red Line
tunnels cross the Hollywood Fault north of the Highland Station and were built to these heightened standards.

During the Final EIS/EIR phase, Metro conducted further geotechnical studies to supplement the studies conducted during the Draft EIS/EIR, which concluded that both the Santa Monica fault zone and the WBHL in the Century City vicinity are active fault zones and each fault zone is capable of generating earthquakes of M7 or greater with average surface displacements of 3 to 6 feet. Moreover, there is no knowledge of where either of these faults resides in their respective seismic cycles.

Santa Monica Boulevard effectively lies within the Santa Monica Fault zone from west of Century Park West to east of Avenue of the Stars. The originally proposed Santa Monica Boulevard Station at Avenue of the Stars would be directly within the fault zone. The WBHL is a wide fault zone with several well-defined strands situated along the eastern margin of Century City. It is the inferred northern extension of the active Newport-Inglewood fault zone. The WBHL terminates the active Santa Monica Fault to the east. The refined location of the Santa Monica Station at Century Park East would straddle the WBHL. No evidence of faulting was found on the Constellation Boulevard Station site.

In summary, both of the Santa Monica Boulevard Station options are located within active fault zones, but the Constellation Boulevard Station site is located outside zones of active faulting and can be considered a viable option. The LPA will cross fault zones and will require special designs to accommodate fault movement. These mitigation measures, which are detailed in Section 4.8 of this Final EIS/EIR include:

- GEO-2—Fault Crossing Tunnel, Fault Rupture, Tunnel Crossing
- GEO 7 – Tunnel Advisory Panel Design Review

With implementation of these mitigation measures, impacts will reduced to less than significant. During subsequent design phases, explorations will continue to more precisely locate the fault zones with respect to the tunnel alignment selected and the fault characteristics for design.

All tunnels, stations, shafts and all other project facilities and infrastructure are designed and built with due consideration and a strict adherence to earthquake design requirements, building codes and conformance to Metro Design Standards for the ground motions of the design level earthquakes.

- GEO-1—Seismic Ground Shaking
- GEO-3—Operational Procedures During an Earthquake
- GEO 7 – Tunnel Advisory Panel Design Review

By compliance with these regulations and requirements, potential seismic ground shaking
impacts will be minimized and impacts will be reduced to less than significant.

Your comments about tunneling and liquefaction risks have been noted. Metro has conducted geotechnical and seismic investigations to determine those soil conditions that are subject to liquefaction. Tunnels for the Westside Subway Extension project will be mostly excavated and constructed within consolidated, dense to very dense and stiff to hard soils belonging to older alluvium/Lakewood Formation sediments, which are considered significantly less prone to liquefaction than young alluvial sediments. However, due to the presence of shallow groundwater and young surficial alluvial deposits, there may be potential liquefaction adjacent to the upper portions of some station walls at the Wilshire/La Cienega, Westwood/UCLA, and Westwood/VA Hospital Stations. Lateral spreading is not anticipated in the vicinity of the LPA.

Based on the magnitude of evaluated liquefaction, either structural design or ground improvement techniques or deep foundations to minimize these hazards will be selected. The following mitigation measures will be implemented during operation to reduce risks related to liquefaction:

• GEO 4 – Liquefaction and Seismic Settlement
• GEO 7 – Tunnel Advisory Panel Design Review

With implementation of these mitigation measures, liquefaction risk during operation will be reduced to less than significant.

During construction, designs to minimize risk of liquefaction related damage to the excavation support system include increasing the depth of solider piles to reach non-liquefiable zones, or ground improvement to densify the soil may be provided prior to the installation of the excavation support system therefore liquefaction is not a significant impact during construction.

Your comments about ground settlement and subsidence have been noted. In recent years, Metro has employed improved tunneling techniques to minimize impacts on adjacent properties. Pressurized face tunnel boring machines developed over the past 30 years now provide reliable control of ground movements around the tunnel and have become a standard throughout the world. Behind the cutting wheel at the front of the tunnel is an enclosed chamber that is filled with the excavated soil. This provides pressure that supports the ground in front of the tunnel face and significantly reduces the risk of surface subsidence. Using this technology, Metro recently completed 1.7-miles of twin tunnel for the Metro Gold Line Eastside Extension project, passing beneath structures with no measurable surface subsidence and no substantiated damage claims from settlement.

With regard to subsidence along the LPA, no current substantial subsidence problems related to petroleum or groundwater extraction have been identified. Therefore, the subsidence related to extraction of petroleum and groundwater is not considered a hazard to the LPA during operations. However, the potential exists for ground subsidence related to construction activities such as tunneling and dewatering at station areas along the full...
Dewatering is usually not necessary when tunneling with pressure-face TBM's. However, station construction will require excavations that will encounter the groundwater table and/or perched groundwater, dewatering may be required to complete the construction in some areas. Dewatering of the excavations made during construction could result in potentially damaging subsidence adjacent to the construction area. However, experience in much of the corridor is that the soils have previously undergone numerous cycles of ground-water fluctuation, and have therefore previously experienced the settlements associated with lowering of the ground water, and will not be expected to have significant additional settlement.

To minimize risks, prior to construction, structures along the tunnel alignment are assessed and tunneling equipment and operating criteria are selected that will best protect the structures. Ground movements are limited by monitoring and controlling critical operations of the tunnel boring machine, and, if needed, by use of supplemental ground control measures, such as grouting. Ground movements around the tunnel and at the surface are measured and nearby structures are surveyed in order to make timely adjustments and to confirm that ground movements are under control as the tunnel is advanced. The following mitigation measures will be implemented during construction to minimize any potential for ground settlement or subsidence.

- CON-47—Use of Pressurized-face TBM’s for Tunnel Construction
- CON-48—Preconstruction Survey, Instrumentation, and Monitoring
- CON-49—Additional Geotechnical Exploration
- CON-50—Additional Methods to Reduce Settlement

With implementation of these mitigation measures, construction risks related to subsidence and settlement will be reduced to less than significant.

Your comment regarding methane gas and other subsurface hazardous gases has been noted.

Safety, both during construction and eventual operations, is one of Metro’s highest priorities. It was also one of the key evaluation criteria during the Draft EIS/EIR, and has been further considered in the Final EIS/EIR phase. In 2005, an American Public Transportation Association Peer Review Panel determined that “it is possible to tunnel and operate a subway along the Wilshire Corridor safely.” This conclusion was reached given the newer technology now used for tunneling, including pressurized face tunnel boring machines.

Subsurface gas is present throughout much of the Los Angeles area and is often a factor in foundation design and construction of underground structures. While tunneling for transportation has special considerations, other projects have been constructed in subsurface gas zones within the Los Angeles region, including buildings with deep parking garages and basements, storm drains, sewer projects and other utility projects along the
Wilshire Corridor. In addition, Metro has safely operated the existing Metro Red/Purple Line subway for over 15 years and has successfully constructed subway tunnels where subsurface gas has been present.

Methane and hydrogen sulfide are present in high concentrations along about a 1.1 mile stretch of the Westside Subway Extension alignment along Wilshire Boulevard from about Burnside Avenue on the east to about La Jolla Avenue on the west. However, the entire LPA alignment passes through an area characterized by oil and gas fields and is within the City’s Methane Zone. Therefore, the possibility of encountering gaseous subsurface conditions can be expected for any portion of the alignment, and hazardous subsurface gases pose a significant hazard for construction of the LPA.

During construction, the pressurized face tunnel boring machines isolate gas from workers and the public, while gassy soil and tar sands are handled and disposed of appropriately. Robust underground ventilation and gas monitoring systems provide additional warning and protection. In addition, the state of California’s division of Occupational Safety and Health (Cal/OSHA) maintains strict safety orders for tunneling where ground is classified as “Gassy” or “Potentially Gassy.” Safety measures include continuous monitoring of the environment, “spark-proof” equipment, and other means to reduce risks to workers and the surroundings. The following mitigation measures will be implemented during construction of the LPA to reduce risks related to the presence of hazardous subsurface gases:

• CON-51—Techniques to Lower the Risk of Exposure to Hydrogen Sulfide
• CON-52—Measures to Reduce Gas Inflows
• CON-53—Further Research on Oil Well Locations
• CON-54—Worker Safety for Gassy Tunnels

The design and operation for tunnels and stations will provide a redundant protection system against gas intrusion. This will include: physical barriers to keep gas out of the tunnels and stations; high volume ventilation systems to dilute gases to safe levels; gas detection and monitoring systems with alarms; emergency ventilation triggered by the gas detection systems; additional training of personnel to respond to alarms. The following mitigation measures will be implemented during operation of the LPA to minimize risks related to subsurface hazardous gases:

• GEO-5 – Hazardous Subsurface Gas Operations
• GEO-6—Hazardous Subsurface Gas Structural Design
• GEO-7 – Tunnel Advisory Panel Design Review

With implementation of these mitigation measures, risks associated with hazardous subsurface gases will be reduced to less than significant levels during both construction and operation of the LPA.

Please refer to Section 4.8 and Section 4.15 of the Final EIS/EIR for more detailed discussion of seismic safety, liquefaction, subsidence, and subsurface gasses both during operation and construction. The results of further geotechnical investigations conducted
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during the Final EIS/EIR can be found in the Westside Subway Extension Century City Area Fault Investigation Report and the Westside Subway Extension Century City Area Tunneling Safety Report. All reports are available on the Metro Westside Subway Extension Project website: www.metro.net/projects/westside/westside-reports.
designated in 1985 after naturally occurring methane gas caused a fire in the Fairfax district. The planning for a subway was later suspended in 1998... " In October 2005, at the request of Metro and the Mayor of the City of Los Angeles, the American Public Transportation Association (APTA) conducted a peer review to reconsider the feasibility of tunneling along the federally precluded Wilshire Boulevard segment of the Westside Corridor. As a result of this review, which concluded that tunnels could be safely constructed and operated along Wilshire Boulevard due to advances in new tunnel construction methods that were previously unavailable, legislation was enacted in Congress repealing the Federal prohibition on Subway funding in December 2007." Where have I heard this before? Isn’t it time to reexamine the extreme danger posed by tunneling and operating the subway on Wilshire Boulevard in the Fairfax district? The explosion and fire occurred at the Ross store (if I remember correctly) that is approximately four blocks north of Wilshire on Third Street.

During the preparation of the Final EIS/EIR, a comprehensive study of all available information found that there was one mapped abandoned oil well within the proposed subway tunnels. The oil fields themselves are much deeper than the potential subway tunnels. Shafts for existing and oil well casings have been safely removed and re-abandoned.

Los Angeles tunneling history, there have been no oil well incidents related to tunneling, and oil well casings have been safely removed and re-abandoned.

Successful subway attacks have been carried out overseas. In the Westwood area, there are oil wells shown on one of the diagrams listed as abandoned near Beverly Glen Blvd. There are also easements to oil companies in the deeds to some properties. This means that there could be oil deposits under our homes or could be pipelines under our homes. Please identify all of these easements and well locations, street addresses and discuss how you plan to deal safely with the tunneling under our homes between the Century City station and the Westwood/UCLA and or Westwood V.A. stations. The EIR page 463 states that any wells or oil discovered during the tunneling will be dealt with at that time. All of these wells, pipes and oil deposits should be identified before this project is approved. If they are present, the route should not continue through that area in the vicinity of homes.

A geophysical (magnetic) survey was performed on the BHHS campus to detect metal, which would indicate the presence of an abandoned oil well casing. The survey identified only one anomaly on the BHHS campus that is close to the alignment. It is on the west edge of the lacrosse field and is located 5 to 10 feet north of the tunnel envelope. The anomaly may or may not be a well casing, but it will be further investigated and addressed appropriately as described below.

For exploration beneath the BHHS buildings during the next phases of design, horizontal directional drilling (HDD) investigation will be conducted along the alignment at tunnel level. A magnetometer probe survey will be conducted in the drilled hole to detect metal casings so that if found, they can be re-abandoned properly below the tunnel depth prior to tunneling. Moreover, during tunnel construction in Los Angeles, magnetometer surveys have been conducted in probe borings extending in front of the TBM to ensure that obstructions, such as well casings, are detected before they are reached by the TBM. In suspected oil field areas, probing of the tunnel zone will be carried out by HDD either before tunneling or ahead of the face during tunneling. To ensure that these additional...
studies are conducted, the following mitigation is included in the Final EIS/EIR.

• CON-53-Further Research on Oil Well Locations

With implementation of this mitigation measure, oil wells do not pose a risk to tunneling for the project. Abandoned oil wells have been encountered in the past during tunneling in Los Angeles. Procedures have been developed to evaluate the well conditions and safely re-abandon them. Metro has experienced no gas incidents related to encounters with oil well casings during tunnel excavation on other projects.

Please refer to Section 4.8 and Section 4.15 of the Final EIS/EIR for more detailed discussion of oil wells. The results of further geotechnical investigations conducted during the Final EIS/EIR can be found in the Westside Subway Extension Century City Area Fault Investigation Report and the Westside Subway Extension Century City Area Tunneling Safety Report. All reports are available on the Metro Westside Subway Extension Project website: www.metro.net/projects/westside/westside-reports.
Your comment about groundwater levels has been noted. Tunnels will be excavated to a great extent below the ground water table. Pressurized face tunnel boring machines will be used for excavation of the tunnels, and a gasketed tunnel lining will be installed as the tunnel shield advances, so that inflow of water into the tunnel, and thus, potential for lowering the ground water table above the tunnel route will be minimal. Stations will be excavated partially above and below the water table. Local dewatering around the station perimeter may be required to allow for safe and dry conditions during construction. If dewatering is to be implemented, groundwater level monitoring will be performed and impact from dewatering on the ground surface (settlement) and/or adjacent structures will be monitored and evaluated. The following mitigation measures will be implemented during construction to reduce impacts related to dewatering:

- CON-47—Use of Pressurized-face TBMs for Tunnel Construction
- CON-48—Preconstruction Survey, Instrumentation, and Monitoring
- CON-49—Additional Geotechnical Exploration
- CON-50—Additional Methods to Reduce Settlement
- CON-70—Methods to Control Contaminated Groundwater
- CON-71—Plan if Contaminated Groundwater is Encountered

With implementation of these mitigation measures, impacts related to dewatering will be reduced to less than significant.

Please refer to Section 4.8 (operations) and Section 4.15 (construction) of the Final EIS/EIR for more detailed discussion of groundwater. The results of further geotechnical investigations conducted during the Final EIS/EIR can be found in the Westside Subway Extension Century City Area Tunneling Safety Report. All reports are available on the Metro Westside Subway Extension Project website: www.metro.net/projects/westside/westside-reports.

Your comment on security personnel at project stations has been noted. The Transit Services Bureau (TSB) is responsible for the law enforcement and security activities throughout the Metro system. The Metro Sheriff's approximate 400 member unit is manned by over 300 sworn law enforcement Deputies and approximately 50 Fare Inspectors. TSB members have received various types of Homeland Security anti-terrorism training that they apply during their patrols of Metro headquarters, stations, platforms, and rail and bus yards throughout the system. Currently, throughout this Project, and into the beginning of service of the subway extension, the TSB will continue to perform their current law enforcement, fare inspection, and security responsibilities of the Metro system.

The security of Metro passengers is a methodical and well thought out process that includes Federal mandates and State oversight to ensure requirements are met at many
different levels. While it would not be advantageous to the public at large to describe the
details of the Metro security program, Metro's top priority is passenger security. A
combination of factors make up the Metro Security Program. Metro has instituted and
advertised security awareness campaigns throughout the system to make passengers
aware of security efforts. Examples include security awareness and Sheriff's Hotline
programs that encourage passengers to be aware of their surroundings as they ride the
system and report suspicious activities to the TSB. From a design standpoint, security
assessments performed throughout the design and construction processes will identify
potential security weaknesses and the appropriate security solutions to reduce risk to
passengers. Through these processes, designs are identified, analyzed, and implemented
to assure passengers that responsible security measures are in place.

Your comment regarding the rail operations center has been noted. Please refer to the
description of the Operating Plan in the LPA Project definition in Section 2.6.1 of the Final
EIS/EIR for a description of the planned expansion of the Rail Operations Center. Metro will
construct an expanded ROC as a systemwide improvement prior to the opening of the
Westside Subway Extension. The expansion of the ROC is not a component of the LPA,
but the project will contribute funding to cover a fair share of costs. Each rail project
included in Measure R, including the Westside Subway Extension, Regional Connector,
and Crenshaw, would contribute funding to the expansion of the rail operations center.
Therefore, the Westside Subway Extension would only fund a portion of the expansion.

Your comment regarding water used during construction has been noted. Water use
related to construction is discussed in Section 4.15 of the Final EIS/EIR. Section 4.15
concludes that dewatering activities will not deplete the water supply.

Your comment regarding air quality during construction has also been noted. Any air quality
impacts experienced during construction would be temporary in nature. Please see the
response to comment number 453-14. Refer to Section 4.15 of the Final EIS/EIR for a
discussion of air quality impacts related to construction and mitigation.

The Project is an integral part of the area’s goal to reduce GHG emissions. A payback
period has been calculated to determine when operational savings will surpass construction
emissions and is discussed in Section 4.15 of the Final EIS/EIR.

Your comment regarding truck haul routes during construction has been noted.
Anticipated truck haul routes consist of major city arterial streets that trucks will use to transport spoils, muck, material, and equipment between the construction laydown site locations and the offsite disposal location using the nearest freeway interchange. To minimize peak-period traffic disruptions, haul truck activity will occur during off-peak and nighttime periods. These routes generally follow major commercial streets and avoid residential areas to the greatest extent possible. The proposed routes identified are provided in Section 3.8 of this Final EIS/EIR and the Westside Subway Extension Construction Traffic Analysis Report. The routes may be updated and revised once additional information, such as construction sequencing, is finalized. In addition, the proposed routes will be subject to the approval of Metro and appropriate departments at Federal, State, and local agencies. The routes will be finalized in coordination with local jurisdictions and will be located so as to minimize noise, vibration, and other possible impacts to adjacent businesses and neighborhoods.

TBM components will be transported to the tunnel construction site by truck. Several oversize deliveries will be required, some during nights and weekends. However, these large component deliveries are limited to the initial setup period for the TBM, as well as during the removal period. If a TBM is re-used to excavate a subsequent tunnel, the entire machine may be transported by road from one site to the next. This would require full or partial road closures, typically at night.

Following completion of the Project, if physical damage to haul routes was found, affected roads will be treated in a manner that returns affected facilities to pre-construction conditions.

To minimize impacts to traffic circulation, the following mitigation measures will be implemented during construction:

- TCON-2—Designated Haul Routes

T-CON-2 was added during this Final EIS/EIR phase based on additional analysis of construction impacts related to haul routes and concerns raised by the public. With implementation of the mitigation, construction-related adverse effects related to haul routes will be reduced for adjacent commercial areas and residential neighborhoods. Although the construction impacts identified will be temporary, impacts and/or residual impacts after mitigation will remain significant and unavoidable during the construction period.

Your comment about the sequence and duration of construction activities has been noted.

Construction durations for the LPA are divided into three segments (Wilshire/Western to Wilshire/La Cienega, Wilshire/La Cienega to Century City, and Century City to Westwood/VA Hospital). These three segments can be constructed either concurrently under the Concurrent Construction Scenario or as sequential phases under the Phased
Construction Scenario. Under either scenario, portions of activities will occur at the same time as other activities. Under the Concurrent Construction Scenario, a greater number of activities will overlap than with the Phased Construction Scenario because construction on all three segments will occur simultaneously. The approximate duration of construction activities for each element are approximately the same under both the Concurrent Construction Scenario and the Phased Construction Scenario.

In April 2010, the Metro Board of Directors adopted the America Fast Forward 30/10 Initiative that directs that the Westside Subway Extension Project to seek accelerated federal funding to deliver the Project in a single phase to Westwood. Based on this accelerated funding schedule (Concurrent Construction Scenario), the parallel construction of portions of the alignment and stations would allow the entire LPA to be open and operational to the Westwood/VA Hospital Station in 2022 as a single phase. Under this scenario, the LPA could be constructed within a time-span of approximately 11 years (including pre-construction activities) if all work is concurrently scheduled.

In the event that accelerated federal funding cannot be secured, the LPA would be constructed in three sequential phases in accordance with the Metro Long Range Transportation Plan (Phased Construction Scenario). The first phase to the Wilshire/La Cienega Station construction would commence in 2013 and be completed in 2020 with Phase 1 opening for operation in 2020. The second phase to the Century City Station would begin in 2019 and be completed in 2026 with Phase 2 opening for operation in 2026. The final phase to the Westwood/VA Hospital Station would begin in 2029 and be completed in 2036.

A generalized sequence of construction activities, including average times for each activity, was included in Appendix E, Construction Methods, of the Draft EIS/EIR. The sequence of activities and the durations of the activities were refined as part of the evaluation of the Locally Preferred Alternative during preparation of the Final EIS/EIR. The refined sequence and durations can be found in Section 4.15, which contains a table entitled “Generalized Sequence and Approximate Duration of Construction Activities” and Appendix E of the Final EIS/EIR. Tunnel construction is anticipated to take approximately 8 to 12 months for atypical one-mile length between stations. Relocation of underground utilities is estimated to last 18 to 24 months, station excavation is anticipated to last one year, and station construction is estimated to take 2.5 years. In addition, street/site restoration will last approximately 4 months, installation of vent shafts and emergency exits will take 12 months, system installation and facilities will require approximately 2.5 years and system testing and pre-revenue operations will last approximately 5 to 6 months.

Ultimately, the construction contractor will develop the construction sequence and durations. The construction sequencing and durations will be clearly specified so that business owners and residents will be able to know when construction is estimated to occur and the duration of the construction activities.

Refer to Section 3.8 of the Final EIS/EIR and the Westside Subway Extension Construction Traffic Analysis Report for more information on proposed haul routes. All reports are available on the Metro Westside Subway Extension Project website:
Please see the response to comment 453-28 above regarding ground water.

With regard to slurry production, where hazardous hydrocarbons and/or gases are expected to be encountered, it is likely that a specialized slurry-face TBM would be required. Slurry-face TBMs use a fully enclosed system to transport excavated soil to the surface. Bentonite slurry is pumped through pipelines to the TBM's pressurized face, and soil cuttings are removed through the return slurry lines. A treatment plant is set up at the surface to separate slurry from soil so that the slurry can be recycled and the soil transported to a disposal site.
Appendix H - Response to Comments

453-35

Is this subway extension project a design build project? If so, has this been put out to competitive bid?

453-36

Under the California Public Records Act I am requesting a copy of the sign in sheets for the public meetings. Please advise us first of the cost involved.

453-37

In the event that this project goes forward, which I hope it does not, I would propose that you revisit the golf course route. My idea of the golf course route is to continue up Wilshire Boulevard to the Los Angeles Country Club golf course (just west of Beverly Hills), construct a short tunnel perpendicular to the main tunnel going from Wilshire south to Century City with an underground or surface area to change trains. Have the side train travel south under the golf course and end up at one of the Century City proposed stations. Then the train travels back to Wilshire under the golf course. The main train continues west, under the middle of Wilshire Boulevard to the Westwood/UCLA or Westwood/VA station. The EIR mentions a golf course route that was discussed earlier, with many residential easements required. What are the street addresses of those residential properties requiring easements? That seems to be that seems to be erroneous since the above suggestion would require no residential easements.

EIR – Page 4-42 – Even the Santa Monica/Westwood Blvd (west route) would be preferable to tunneling under the single family residential neighborhoods since it involves the smallest number of permanent underground easements.

453-38

The TSM alternative would be more desirable than the build alternatives. TSM would be much less expensive, less hazardous, and less disruptive to the neighborhoods.

453-39

However, at this time, for all the reasons and reservations stated in this letter, we support the NO BUILD alternative.

Paula D. Levin

Glenn J. Flug

10526 Wellworth Avenue
Los Angeles, Ca. 90024
Glenn.Flug@yahoo.com

453-35

At this point Metro has not yet determined whether this project would be a design build contract.

453-36

Metro staff has received your request and provided the appropriate information.

453-37

Your comment about the alignment between Century City and Westwood has been noted. The Golf Course route was considered following scoping for the Draft EIS/EIR. It was not carried forward for analysis in the Draft EIS/EIR due to length, cost, and travel time. Please see the Westside Subway Extension Alternatives Screening and Refinement following Environmental Scoping Report for more information.

The East Alignment was approved by the Metro Board to be carried forward as part of the Locally Preferred Alternative (LPA), and the Central and West Alignments were removed from further consideration as part of the LPA. The West Alignment is significantly longer than the other two, and would increase travel time between Century City and Westwood by more than two minutes. This, in turn, would lead to somewhat lower ridership and user benefits, and to fewer air quality and energy conservation benefits. The West Alignment Option would also increase capital costs by $122 to $142 million in comparison to the East Alignment Option. Between the Central and East Alignment Options, both have similar performance characteristics and costs. The East Alignment, however, passes under fewer private properties. Therefore, it was selected to be carried forward in the LPA into the Final EIS/EIR.

As part of the LPA selection, the Metro Board of Directors also requested that Metro staff fully explore the risks associated with tunneling in the West Beverly Hills to Westwood area. Safety, both during construction and eventual operations, is one of Metro’s highest priorities and is one of the key evaluation criteria in selection of the LPA. The resulting studies have been completed as part of the Final EIS/EIR and are presented in two separate reports: the Westside Subway Extension Century City Area Fault Investigation Report and the Westside Subway Extension Century City Area Tunneling Safety Report.

On most transit tunnel projects, significant portions of the alignment are constructed adjacent to or beneath buildings. The LPA passes beneath homes and schools in these neighborhoods because the curve radius required for subway tunnels is much wider than that required at a typical surface street intersection. The current alignment minimizes tunneling under buildings to the east and west of both the Century City Stations.

The geotechnical studies conducted during preparation of the Final EIS/EIR concluded that tunneling can be safely carried out beneath the Beverly Hills High School campus and the
West Beverly Hills, Century City, and Westwood neighborhoods. The use of state-of-the-art pressurized closed-face TBM s for soft-ground tunneling has greatly improved the control of ground movements such that tunneling can be done with minimal surface settlements. The presence of the tunnels will neither affect the risk to buildings above them during an earthquake nor change the severity of shaking. Finally, tunnels can be constructed and operated safely in gassy grounds and oil wells do not pose an unmitigable risk to tunneling.

The additional detailed geotechnical studies also assessed soil conditions and determine the potential for noise or vibration impacts on the surface along the refined alignments. These studies concluded that the predicted vibration and noise levels are within the FTA requirements and operation of the subway is not anticipated to have adverse impacts with the implementation of mitigation, including areas where the tunnels pass beneath homes and schools. During construction, low levels of noise and vibration may be experienced for a day or two as each of the two TBM s pass under a given location. In addition, as the tunnels are driven, construction trains bring supplies to and from the tunnel heading. However, these underground construction noises will also be controlled to be within Metro criteria.

These geotechnical studies also determined that the Century City Santa Monica Station would cross the West Beverly Hills Lineament, a northern extension of the active Newport-Inglewood Fault, which poses a significant safety risk to passengers at this station location. No evidence of faulting was found at the proposed Century City Constellation Station site. Tunnels to the east and west of Century City pass through at least two active faults. However, there are numerous tools, designs, and construction means and methods that have been used elsewhere that can be used to safely tunnel through these fault zones.

Please refer to Section 8.8.3 of the Final EIS/EIR for a more detailed response to alignments and Section 8.8.4 of the Final EIS/EIR for a more detailed response to geotechnical concerns. Please refer to Sections 2.3, 2.4, and 2.5 of the Final EIS/EIR for an overview of the development of alternatives, including alignment locations, and the LPA selection process. The Westside Subway Extension Alternatives Screening and Refinement Following Scoping Report provides a more detailed description of the refinements to the alignment between Century City and Westwood following Draft EIS/EIR scoping in response to community comments and engineering requirements. The results of further geotechnical investigations in the Century City vicinity can be found in the Westside Subway Extension Century City Area Fault Investigation Report and the Westside Subway Extension Century City Area Tunneling Safety Report. All reports are available on the Metro Westside Subway Extension Project website:

www.metro.net/projects/westside/westside-reports.
Your preference for the TSM Alternative has been noted. On October 28, 2010, the Metro Board of Directors identified Alternative 2 (Westwood/VA Hospital Extension) as the Locally Preferred Alternative (LPA). Alternative 2 was selected as the LPA because the analysis in the Draft EIS/EIR demonstrated that the Build Alternatives would be more effective than the TSM Alternative in terms of enhancing mobility, serving development opportunities, and addressing other aspects of the Purpose and Need for the Project. Please refer to Chapter 7 of the Draft EIS/EIR and Section 2.5 of the Final EIS/EIR for information on this analysis.

Furthermore, bus operating funds will not be used to construct the Project, and no fare increases or service reductions are proposed to cover the Project’s costs. The Project will not eliminate bus service along Wilshire Boulevard but rather will supplement it with rail. As explained in Chapter 2, Metro Local, Limited, Rapid, and Express bus service along Wilshire Boulevard will continue to operate in conjunction with the rail system, if approved and implemented. The Wilshire Boulevard Bus Rapid Transit project is also assumed to be in place. Maintenance of local bus service levels is an important component of the transit system serving the Westside Corridor. With the extension the Purple Line subway service to the Westwood/VA Hospital Station, it is estimated that one-third of demand will involve local bus access. Metro continues to seek to improve the region’s transit needs and continually evaluates various transit corridors to achieve a more interconnected transportation system. To help guide design of subway stations, potential enhanced local bus service at stations was assessed and is discussed in Chapter 3 of the Final EIS/EIR.

Please refer to Sections 2.3, 2.4, and 2.5 of the Final EIS/EIR for an overview of the development of alternatives and the LPA selection process.

Your comment in opposition to the Westside Subway Extension Project has been noted. On October 28, 2010, the Metro Board of Directors identified Alternative 2 (Westwood/VA Hospital Extension) as the Locally Preferred Alternative. Only Alternatives 1 and 2 are affordable within the adopted Long Range Transportation Plan, and between them, Alternative 2 provides higher ridership and improved cost effectiveness. Additionally, Alternative 2 serves the VA Hospital and other communities west of the I-405 more effectively.

Please refer to Sections 2.3, 2.4, and 2.5 of the Final EIS/EIR for an overview of the development of alternatives and the LPA selection process.
Please use good sense and have the westside line go under Santa Monica Blvd. To have it under BHHS and residences is a serious mistake. Do not let developers in Century City make the decision for you.

Sylvia Fogelman
1225 Beverly Green Drive
Beverly Hills, CA
earthquake nor change the severity of shaking. Finally, tunnels can be constructed and operated safely in gassy grounds and oil wells do not pose an unmitigatable risk to tunneling.

The additional detailed geotechnical studies also assessed soil conditions and determine the potential for noise or vibration impacts on the surface along the refined alignments. These studies concluded that the predicted vibration and noise levels are within the FTA requirements and operation of the subway is not anticipated to have adverse impacts with the implementation of mitigation, including areas where the tunnels pass beneath homes and schools. During construction, low levels of noise and vibration may be experienced for a day or two as each of the two TBMs pass under a given location. In addition, as the tunnels are driven, construction trains bring supplies to and from the tunnel heading. However, these underground construction noises will also be controlled to be within Metro criteria.

The Westside Subway Extension will not reduce the availability of BHHS for use as an emergency shelter or impact the operations of its use as an emergency shelter. Furthermore, tunneling would not prevent future development of the BHHS campus. The vertical alignment of the tunnel would be 55 to 70 feet below the ground surface (to the top of the tunnel), which would allow for construction of an underground structure over the tunnel at a later date.

These geotechnical studies also determined that the Century City Santa Monica Station would cross the West Beverly Hills Lineament, a northern extension of the active Newport-Inglewood Fault, which poses a significant safety risk to passengers at this station location. No evidence of faulting was found at the proposed Century City Constellation Station site. Tunnels to the east and west of Century City pass through at least two active faults. However, there are numerous tools, designs, and construction means and methods that have been used elsewhere that can be used to safely tunnel through these fault zones.

In addition, the Century City Constellation Boulevard Station has the best pedestrian environment, can be expected to attract the most transit riders, and is centrally located to help shape the redevelopment of Century City as an important transit-oriented destination on the Westside Subway Extension. Further refinements to the ridership analysis concluded that the Century City Constellation Station would result in 3,350 more boardings along new Westside Subway Extension stations than the Century City Santa Monica Station due to proximity to jobs and residences within the critical 600-foot and 1/4-mile walksheds.

Based on all of these factors, the Century City Station Location Report concluded by recommending that the Century City Station be located along Constellation Boulevard due to seismic safety concerns at the Santa Monica Boulevard Station and higher ridership
Please refer to Section 8.8.2 and 8.8.3 of the Final EIS/EIR for more detailed responses to concerns related to the Century City Station and alignments and Section 8.8.4 of the Final EIS/EIR for a more detailed response to geotechnical concerns. Refer to Section 7.3 of the Final EIS/EIR and the Westside Subway Extension Century City Station Location Report for a comparison of the two Century City Station locations. The results of further geotechnical investigations in the Century City vicinity can be found in the Westside Subway Extension Century City Area Fault Investigation Report and the Westside Subway Extension Century City Area Tunneling Safety Report. The results of further ridership studies can be found in the Westside Subway Extension Technical Report Summarizing the Results of the Forecasted Alternatives and the Westside Subway Extension Century City TOD and Walk Access Study. All reports are available on the Metro Westside Subway Extension Project website: www.metro.net/projects/westside/westside-reports.
Your comment in support of the Century City Santa Monica Station and concerns about tunneling beneath homes and schools has been noted. On October 28, 2010, the Metro Board of Directors identified Alternative 2 (Westwood/VA Hospital Extension) as the Locally Preferred Alternative (LPA). As part of the LPA selection, the Metro Board of Directors decided to continue to study both station location options in Century City (Santa Monica Boulevard and Constellation Boulevard) to address concerns raised by the community regarding locating a station directly on a seismic fault and the safety of tunneling under homes and schools. The Metro Board of Directors also decided to not include the Constellation South alignment between the Wilshire/Rodeo and Century City Stations as part of the LPA, but to continue to study the Constellation North and the Santa Monica Boulevard alignments. The Constellation South alignment passed beneath more residential properties than the Constellation North or Santa Monica Boulevard alignments. In addition, the Metro Board of Directors decided to not include the West or Central alignments between Century City and Westwood/UCLA as part of the LPA, but to continue to study the East alignment because the East alignment is the most direct and least expensive route between the two stations.

Safety, both during construction and eventual operations, is one of Metro’s highest priorities and is one of the key evaluation criteria in selection of the Locally Preferred Alternative (LPA). In response to the Metro Board of Director’s request for more information, further analysis was undertaken to focus on the engineering and environmental aspects of the two options during the preparation of the Final EIS/EIR to expand on the studies conducted in preparation of the Draft EIS/EIR. It should be noted that prior to conducting the comparative study, the Santa Monica Boulevard Station location was shifted slightly to the east from the location in the Draft EIS/EIR to avoid the Santa Monica Fault zone.

On most transit tunnel projects, significant portions of the alignment are constructed adjacent to or beneath buildings. The LPA passes beneath homes and schools in these neighborhoods because the curve radius required for subway tunnels is much wider than that required at a typical surface street intersection. The current alignment minimizes tunneling under buildings to the east and west of both the Century City Stations. The station position on Constellation Boulevard requires the tunnel alignment to be under the south portion of Beverly Hills High School Building B in order to reach the station location. There is no reasonable tunnel alignment that does not pass under homes or structures within the Beverly Hills High School campus.

The geotechnical studies conducted during preparation of the Final EIS/EIR concluded that tunneling can be safely carried out beneath the Beverly Hills High School campus and the West Beverly Hills, Century City, and Westwood neighborhoods. The use of state-of-the-art pressurized closed-face TBMs for soft-ground tunneling has greatly improved the control of ground movements such that tunneling can be done with minimal surface settlements. The presence of the tunnels will neither affect the risk to buildings above them during an
earthquake nor change the severity of shaking. Finally, tunnels can be constructed and operated safely in gassy grounds and oil wells do not pose an unmitigable risk to tunneling.

The additional detailed geotechnical studies also assessed soil conditions and determine the potential for noise or vibration impacts on the surface along the refined alignments. These studies concluded that the predicted vibration and noise levels are within the FTA requirements and operation of the subway is not anticipated to have adverse impacts with the implementation of mitigation, including areas where the tunnels pass beneath homes and schools. During construction, low levels of noise and vibration may be experienced for a day or two as each of the two TBMs pass under a given location. In addition, as the tunnels are driven, construction trains bring supplies to and from the tunnel heading. However, these underground construction noises will also be controlled to be within Metro criteria.

The Westside Subway Extension will not reduce the availability of BHHS for use as an emergency shelter or impact the operations of its use as an emergency shelter. Furthermore, tunneling would not prevent future development of the BHHS campus. The vertical alignment of the tunnel would be 55 to 70 feet below the ground surface (to the top of the tunnel), which would allow for construction of an underground structure over the tunnel at a later date.

These geotechnical studies also determined that the Century City Santa Monica Station would cross the West Beverly Hills Lineament, a northern extension of the active Newport- Inglewood Fault, which poses a significant safety risk to passengers at this station location. No evidence of faulting was found at the proposed Century City Constellation Station site. Tunnels to the east and west of Century City pass through at least two active faults. However, there are numerous tools, designs, and construction means and methods that have been used elsewhere that can be used to safely tunnel through these fault zones.

In addition, the Century City Constellation Boulevard Station has the best pedestrian environment, can be expected to attract the most transit riders, and is centrally located to help shape the redevelopment of Century City as an important transit-oriented destination on the Westside Subway Extension. Further refinements to the ridership analysis concluded that the Century City Constellation Station would result in 3,350 more boardings along new Westside Subway Extension stations than the Century City Santa Monica Station due to proximity to jobs and residences within the critical 600-foot and 1/4-mile walksheds.

Based on all of these factors, the Century City Station Location Report concluded by recommending that the Century City Station be located along Constellation Boulevard due to seismic safety concerns at the Santa Monica Boulevard Station and higher ridership.
projections with Constellation Boulevard Station.

Please refer to Section 8.8.2 and 8.8.3 of the Final EIS/EIR for more detailed responses to concerns related to the Century City Station and alignments and Section 8.8.4 of the Final EIS/EIR for a more detailed response to geotechnical concerns. Refer to Section 7.3 of the Final EIS/EIR and the Westside Subway Extension Century City Station Location Report for a comparison of the two Century City Station locations. The results of further geotechnical investigations in the Century City vicinity can be found in the Westside Subway Extension Century City Area Fault Investigation Report and the Westside Subway Extension Century City Area Tunneling Safety Report. The results of further ridership studies can be found in the Westside Subway Extension Technical Report Summarizing the Results of the Forecasted Alternatives and the Westside Subway Extension Century City TOD and Walk Access Study. All reports are available on the Metro Westside Subway Extension Project website: www.metro.net/projects/westside/westside-reports.
Your comment on the Wilshire/Crenshaw Station has been noted. In October 2010, the Metro Board of Directors identified Alternative 2 (Westwood/VA Extension) as the Locally Preferred Alternative (LPA). A Wilshire/Crenshaw Station was not included in the LPA.

The Wilshire/Crenshaw Station would be located in the Park Mile section of Wilshire Boulevard, adjacent to lower density land uses that are not planned for future growth in the adopted Community Plan and Park Mile Specific Plan. This site is only 0.5 mile from the existing Wilshire/Western Station and does not serve a major north south intersection, as Crenshaw Boulevard terminates at Wilshire Boulevard and does not extend to the north. Because this is a comparatively lower ridership station with a cost of $153 million, eliminating this station from the LPA improves the cost-effectiveness of Alternative 2. Furthermore, future connections from the Westside subway stations along Wilshire Boulevard to the planned Crenshaw/LAX Light Rail Transit project to the south have been recommended to take place at La Brea, La Cienega, or San Vicente rather than at Wilshire/Crenshaw.

Please refer to Sections 2.3, 2.4, and 2.5 of the Final EIS/EIR for an overview of the development of alternatives, including station locations, and the LPA selection process. The Westside Subway Extension Alternatives Screening and Refinement Following Scoping Report provides a more detailed description of the refinements to the Wilshire/Crenshaw Station following Draft EIS/EIR scoping in response to community comments and engineering requirements. This report is available on the Metro Westside Subway Extension Project website: www.metro.net/projects/westside/westside-reports.
The increased connectivity would also reduce the number of transfers which would have a same opportunity to access the transit and mobility improvements provided by the subway.

Section 4.2.6 of the Final EIS/EIR. Therefore, people living in EJ populations will have the stations are located in, or adjacent to the Environmental Justice populations identified in Environmental Justice (EJ) populations and communities of concern. Four of the seven demand is greatest, and these areas are often within neighborhoods that have minority residents who are transit-dependent. Transit service is meant to serve where the improve mobility for residents across Los Angeles County, including low-income and Federal New Starts funds, with some other local, State, and Federal funds. Metro will continue to use a combination of local, State, and Federal funding sources to operate and maintain the system. In addition to these funding sources, Metro relies on fare revenues to fund about one-third of its operating costs. Bus operating funds will not be used to construct the Project, and no fare increases or service reductions are proposed to cover the Project's costs. The selection of the TSM Alternative would not have resulted in lower fares. The Metro Board of Directors establishes fares. Currently, the Base Fare for each boarding is $1.50 and the Metro Day Pass is $5.00. A transfer is the same as the Base Fare - $1.50.

Furthermore, the Project would not eliminate bus service along Wilshire Boulevard but rather would supplement it with rail. As explained in Chapter 2, Metro Local, Limited, Rapid, and Express bus service along Wilshire Boulevard will continue to operate in conjunction with the rail system, if approved and implemented. The Wilshire Boulevard Bus Rapid Transit project is also assumed to be in place. Maintenance of local bus service levels is an important component of the transit system serving the Westside Corridor. With the extension the Purple Line subway service to the Westwood/VA Hospital Station, it is estimated that one-third of demand would involve local bus access. Metro continues to seek to improve the region's transit needs and continually evaluates various transit corridors to achieve a more interconnected transportation system. To help guide design of subway stations, potential enhanced local bus service at stations was assessed and is discussed in Chapter 3 of the Final EIS/EIR.

The Project will be funded primarily through a combination of Measure R local funds and Federal New Starts funds, with some other local, State, and Federal funds. Metro will improve mobility for residents across Los Angeles County, including low-income and minority residents who are transit-dependent. Transit service is meant to serve where the demand is greatest, and these areas are often within neighborhoods that have Environmental Justice (EJ) populations and communities of concern. Four of the seven stations are located in, or adjacent to the Environmental Justice populations identified in Section 4.2.6 of the Final EIS/EIR. Therefore, people living in EJ populations will have the same opportunity to access the transit and mobility improvements provided by the subway.

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. Transit user benefits associated with the LPA are anticipated both along the Project corridor as well as across the region. The transit benefits associated with the LPA are further detailed in Section 3.4 of the Final EIS/EIR.
RECORD #511 DETAIL
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Status : Submission Summarized
Record Date : 10/17/2010
Submission Date : 10/17/2010
First Name : Lisa
Last Name : Francoeur
Group Affiliation :
Submission Content : Urgent request for MTA to choose the Constellation location for the subway station

Your comment in support of the Century City Constellation Station has been noted. On October 28, 2010, the Metro Board of Directors identified Alternative 2 (Westwood/VA Hospital Extension) as the Locally Preferred Alternative (LPA). As part of the LPA selection, the Metro Board of Directors decided to continue to study both station location options in Century City (Santa Monica Boulevard and Constellation Boulevard) to address concerns raised by the community regarding locating a station directly on a seismic fault and the safety of tunneling under homes and schools.

In response to the Metro Board of Director's request for more information, further analysis was undertaken to focus on the engineering and environmental aspects of the two options during the preparation of the Final EIS/EIR to expand on the studies conducted in preparation of the Draft EIS/EIR. It should be noted that prior to conducting the comparative study, the Santa Monica Boulevard Station location was shifted slightly to the east from the location in the Draft EIS/EIR to avoid the Santa Monica Fault zone.

The geotechnical studies conducted during preparation of the Final EIS/EIR concluded that tunneling can be safely carried out beneath the Beverly Hills High School campus and the West Beverly Hills, Century City, and Westwood neighborhoods. However, these studies also determined that the Century City Santa Monica Station would cross the West Beverly Hills Lineament, a northern extension of the active Newport-Inglewood Fault, which poses a significant safety risk to passengers at this station location. No evidence of faulting was found at the proposed Century City Constellation Station site.

In addition, the Century City Constellation Boulevard Station has the best pedestrian environment, can be expected to attract the most transit riders, and is centrally located to help shape the redevelopment of Century City as an important transit-oriented destination on the Westside Subway Extension. Further refinements to the ridership analysis concluded that the Century City Constellation Station would result in 3,350 more boardings along new Westside Subway Extension stations than the Century City Santa Monica Station due to proximity to jobs and residences within the critical 600-foot and 1/4-mile walksheds.

Based on all of these factors, the Century City Station Location Report concluded by recommending that the Century City Station be located along Constellation Boulevard due to seismic safety concerns at the Santa Monica Boulevard Station and higher ridership projections with Constellation Boulevard Station.

Please refer to Section 8.8.2 and 8.8.3 of the Final EIS/EIR for more detailed responses to concerns related to the Century City Station. Refer to Section 7.3 of the Final EIS/EIR and the Westside Subway Extension Century City Station Location Report for a comparison of the two Century City Station locations. The results of further geotechnical investigations in the Century City vicinity can be found in the Westside Subway Extension Century City Area
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Your comment in support of the Century City Constellation Station has been noted. On October 28, 2010, the Metro Board of Directors identified Alternative 2 (Westwood/VA Hospital Extension) as the Locally Preferred Alternative (LPA). As part of the LPA selection, the Metro Board of Directors decided to continue to study both station location options in Century City (Santa Monica Boulevard and Constellation Boulevard) to address concerns raised by the community regarding locating a station directly on a seismic fault and the safety of tunneling under homes and schools.

In response to the Metro Board of Director’s request for more information, further analysis was undertaken to focus on the engineering and environmental aspects of the two options during the preparation of the Final EIS/EIR to expand on the studies conducted in preparation of the Draft EIS/EIR. It should be noted that prior to conducting the comparative study, the Santa Monica Boulevard Station location was shifted slightly to the east from the location in the Draft EIS/EIR to avoid the Santa Monica Fault zone.

The geotechnical studies conducted during preparation of the Final EIS/EIR concluded that tunneling can be safely carried out beneath the Beverly Hills High School campus and the West Beverly Hills, Century City, and Westwood neighborhoods. However, these studies also determined that the Century City Santa Monica Station would cross the West Beverly Hills Lineament, a northern extension of the active Newport-Inglewood Fault, which poses a significant safety risk to passengers at this station location. No evidence of faulting was found at the proposed Century City Constellation Station site.

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Your comment in support of the Century City Constellation Station has been noted. On October 28, 2010, the Metro Board of Directors identified Alternative 2 (Westwood/VA Hospital Extension) as the Locally Preferred Alternative (LPA). As part of the LPA selection, the Metro Board of Directors decided to continue to study both station location options in Century City (Santa Monica Boulevard and Constellation Boulevard) to address concerns raised by the community regarding locating a station directly on a seismic fault and the safety of tunneling under homes and schools.

In response to the Metro Board of Director’s request for more information, further analysis was undertaken to focus on the engineering and environmental aspects of the two options during the preparation of the Final EIS/EIR to expand on the studies conducted in preparation of the Draft EIS/EIR. It should be noted that prior to conducting the comparative study, the Santa Monica Boulevard Station location was shifted slightly to the east from the location in the Draft EIS/EIR to avoid the Santa Monica Fault zone.

The geotechnical studies conducted during preparation of the Final EIS/EIR concluded that tunneling can be safely carried out beneath the Beverly Hills High School campus and the West Beverly Hills, Century City, and Westwood neighborhoods. However, these studies also determined that the Century City Santa Monica Station would cross the West Beverly Hills Lineament, a northern extension of the active Newport-Inglewood Fault, which poses a significant safety risk to passengers at this station location. No evidence of faulting was found at the proposed Century City Constellation Station site.

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Please refer to Section 8.8.2 and 8.8.3 of the Final EIS/EIR for more detailed responses to concerns related to the Century City Station. Refer to Section 7.3 of the Final EIS/EIR and the Westside Subway Extension Century City Station Location Report for a comparison of the two Century City Station locations. The results of further geotechnical investigations in the Century City vicinity can be found in the Westside Subway Extension Century City Area.
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Your preference for the TSM Alternative has been noted. On October 28, 2010, the Metro Board of Directors identified Alternative 2 (Westwood/VA Hospital Extension) as the Locally Preferred Alternative (LPA). Alternative 2 was selected as the LPA because the analysis in the Draft EIS/EIR demonstrated that the Build Alternatives would be more effective than the TSM Alternative in terms of enhancing mobility, serving development opportunities, and addressing other aspects of the Purpose and Need for the Project. Please refer to Chapter 7 of the Draft EIS/EIR and Section 2.5 of the Final EIS/EIR for information on this analysis.

Furthermore, the Project would not eliminate bus service along Wilshire Boulevard but rather would supplement it with rail. As explained in Chapter 2, Metro Local, Limited, Rapid, and Express bus service along Wilshire Boulevard will continue to operate in conjunction with the rail system, if approved and implemented. The Wilshire Boulevard Bus Rapid Transit project is also assumed to be in place. Maintenance of local bus service levels is an important component of the transit system serving the Westside Corridor. With the extension the Purple Line subway service to the Westwood/VA Hospital Station, it is estimated that one-third of demand would involve local bus access. Metro continues to seek to improve the region's transit needs and continually evaluates various transit corridors to achieve a more interconnected transportation system. To help guide design of subway stations, potential enhanced local bus service at stations was assessed and is discussed in Chapter 3 of the Final EIS/EIR.

The Project will be funded primarily through a combination of Measure R local funds and Federal New Starts funds, with some other local, State, and Federal funds. Metro will continue to use a combination of local, State, and Federal funding sources to operate and maintain the system. In addition to these funding sources, Metro relies on fare revenues to fund about one-third of its operating costs. Bus operating funds will not be used to construct the Project, and no fare increases or service reductions are proposed to cover the Project's costs. The selection of the TSM Alternative would not have resulted in lower fares. The Metro Board of Directors establishes fares. Currently, the Base Fare for each boarding is $1.50 and the Metro Day Pass is $5.00. A transfer is the same as the Base Fare - $1.50.

Furthermore, the Westside Subway Extension Project will increase transit options and improve mobility for residents across Los Angeles County, including low-income and minority residents who are transit-dependent. Transit service is meant to serve where the demand is greatest, and these areas are often within neighborhoods that have Environmental Justice (EJ) populations and communities of concern. Four of the seven stations are located in, or adjacent to the Environmental Justice populations identified in Section 4.2.6 of the Final EIS/EIR. Therefore, people living in EJ populations will have the same opportunity to access the transit and mobility improvements provided by the subway.

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. Transit user benefits associated with the LPA are anticipated both along the Project corridor as well as across the region. The transit benefits associated with the LPA are further detailed in Section 3.4 of the Final EIS/EIR.

Additionally, Table 3-10 in the Draft EIS/EIR showed greater decreases in congestion with any of the Build Alternatives than the TSM Alternative. Additionally, as shown in Table 4-16 of the Draft EIS/EIR, there are greater reductions in air pollution with the Build Alternatives than the TSM Alternative.
Your comment in support of the Century City Constellation Station has been noted. On October 28, 2010, the Metro Board of Directors identified Alternative 2 (Westwood/VA Hospital Extension) as the Locally Preferred Alternative (LPA). As part of the LPA selection, the Metro Board of Directors decided to continue to study both station location options in Century City (Santa Monica Boulevard and Constellation Boulevard) to address concerns raised by the community regarding locating a station directly on a seismic fault and the safety of tunneling under homes and schools.

In response to the Metro Board of Director’s request for more information, further analysis was undertaken to focus on the engineering and environmental aspects of the two options during the preparation of the Final EIS/EIR to expand on the studies conducted in preparation of the Draft EIS/EIR. It should be noted that prior to conducting the comparative study, the Santa Monica Boulevard Station location was shifted slightly to the east from the location in the Draft EIS/EIR to avoid the Santa Monica Fault zone.

The geotechnical studies conducted during preparation of the Final EIS/EIR concluded that tunneling can be safely carried out beneath the Beverly Hills High School campus and the West Beverly Hills, Century City, and Westwood neighborhoods. However, these studies also determined that the Century City Santa Monica Station would cross the West Beverly Hills Lineament, a northern extension of the active Newport-Inglewood Fault, which poses a significant safety risk to passengers at this station location. No evidence of faulting was found at the proposed Century City Constellation Station site.

In addition, the Century City Constellation Boulevard Station has the best pedestrian environment, can be expected to attract the most transit riders, and is centrally located to help shape the redevelopment of Century City as an important transit-oriented destination on the Westside Subway Extension. Further refinements to the ridership analysis concluded that the Century City Constellation Station would result in 3,350 more boardings along new Westside Subway Extension stations than the Century City Santa Monica Station due to proximity to jobs and residences within the critical 600-foot and 1/4-mile walksheds.

Based on all of these factors, the Century City Station Location Report concluded by recommending that the Century City Station be located along Constellation Boulevard due to seismic safety concerns at the Santa Monica Boulevard Station and higher ridership projections with Constellation Boulevard Station.

Your concerns about congestion along Santa Monica Boulevard during operation have also been noted. A comprehensive station access circulation study was conducted for all stations, including the Century City Santa Monica Station, due to feedback from 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 station.

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, public parking will not be provided at any stations.

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 Century City Santa Monica Station, due to passengers accessing the station. This analysis concluded that the LPA, including the Century City Santa Monica Station, will not negatively impact any analyzed Study Area intersections in the immediate vicinity of the Century City Santa Monica Station.

Please refer to Section 8.8.2 and 8.8.3 of the Final EIS/EIR for more detailed responses to concerns related to the Century City Station and alignments and Section 8.8.4 of the Final EIS/EIR for a more detailed response to geotechnical concerns. Refer to Section 7.3 of the Final EIS/EIR and the Westside Subway Extension Century City Station Location Report for a comparison of the two Century City Station locations. The results of further geotechnical investigations in the Century City vicinity can be found in the Westside Subway Extension Century City Area Fault Investigation Report and the Westside Subway Extension Century City Area Tunneling Safety Report. The results of further ridership studies can be found in the Westside Subway Extension Technical Report Summarizing the Results of the Forecasted Alternatives and the Westside Subway Extension Century City TOD and Walk Access Study. Refer Section 3.5 of the Final EIS/EIR for an analysis of congestion during operation. All reports are available on the Metro Westside Subway Extension Project website: www.metro.net/projects/westside/westside-reports.
Your comment in support of the Century City Constellation Station has been noted. On October 28, 2010, the Metro Board of Directors identified Alternative 2 (Westwood/VA Hospital Extension) as the Locally Preferred Alternative (LPA). As part of the LPA selection, the Metro Board of Directors decided to continue to study both station location options in Century City (Santa Monica Boulevard and Constellation Boulevard) to address concerns raised by the community regarding locating a station directly on a seismic fault and the safety of tunneling under homes and schools.

In response to the Metro Board of Director’s request for more information, further analysis was undertaken to focus on the engineering and environmental aspects of the two options during the preparation of the Final EIS/EIR to expand on the studies conducted in preparation of the Draft EIS/EIR. It should be noted that prior to conducting the comparative study, the Santa Monica Boulevard Station location was shifted slightly to the east from the location in the Draft EIS/EIR to avoid the Santa Monica Fault zone.

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Based on all of these factors, the *Century City Station Location Report* concluded by recommending that the Century City Station be located along Constellation Boulevard due to seismic safety concerns at the Santa Monica Boulevard Station and higher ridership projections with Constellation Boulevard Station.

Please refer to Section 8.8.2 and 8.8.3 of the Final EIS/EIR for more detailed responses to concerns related to the Century City Station. Refer to Section 7.3 of the Final EIS/EIR and the *Westside Subway Extension Century City Station Location Report* for a comparison of the two Century City Station locations. The results of further geotechnical investigations in the Century City vicinity can be found in the *Westside Subway Extension Century City Area...
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Your comment in support of the Century City Constellation Station has been noted. On October 28, 2010, the Metro Board of Directors identified Alternative 2 (Westwood/VA Hospital Extension) as the Locally Preferred Alternative (LPA). As part of the LPA selection, the Metro Board of Directors decided to continue to study both station location options in Century City (Santa Monica Boulevard and Constellation Boulevard) to address concerns raised by the community regarding locating a station directly on a seismic fault and the safety of tunneling under homes and schools. The Metro Board of Directors also decided to not include the Constellation South alignment between the Wilshire/Rodeo and Century City Stations as part of the LPA, but to continue to study the Constellation North and the Santa Monica Boulevard alignments. The Constellation South alignment passed beneath more residential properties than the Constellation North or Santa Monica Boulevard alignments. In addition, the Metro Board of Directors decided to not include the West or Central alignments between Century City and Westwood/UCLA as part of the LPA, but to continue to study the East alignment because the East alignment is the most direct and least expensive route between the two stations.

In response to the Metro Board of Director’s request for more information, further analysis was undertaken to focus on the engineering and environmental aspects of the two options during the preparation of the Final EIS/EIR to expand on the studies conducted in preparation of the Draft EIS/EIR. It should be noted that prior to conducting the comparative study, the Santa Monica Boulevard Station location was shifted slightly to the east from the location in the Draft EIS/EIR to avoid the Santa Monica Fault zone.

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Your comment on the Wilshire/Crenshaw Station has been noted. In October 2010, the Metro Board of Directors identified Alternative 2 (Westwood/VA Extension) as the Locally Preferred Alternative (LPA). A Wilshire/Crenshaw Station was not included in the LPA.

The Wilshire/Crenshaw Station would be located in the Park Mile section of Wilshire Boulevard, adjacent to lower density land uses that are not planned for future growth in the adopted Community Plan and Park Mile Specific Plan. This site is only 0.5 mile from the existing Wilshire/Western Station and does not serve a major north south intersection, as Crenshaw Boulevard terminates at Wilshire Boulevard and does not extend to the north. Because this is a comparatively lower ridership station with a cost of $153 million, eliminating this station from the LPA improves the cost-effectiveness of Alternative 2. Furthermore, future connections from the Westside subway stations along Wilshire Boulevard to the planned Crenshaw/LAX Light Rail Transit project to the south have been recommended to take place at La Brea, La Cienega, or San Vicente rather than at Wilshire/Crenshaw.

Your comment on future transit connections to the Crenshaw/LAX Line has been noted. In November 2009, the Metro Board voted to approve the Locally Preferred Alternative (LPA) for the Crenshaw/LAX Transit Corridor. The Crenshaw/LAX LPA includes an 8.5-mile light-rail line that would connect the Metro Green Line and the Expo Line along Crenshaw Boulevard. The Crenshaw/LAX LPA would not connect the line to Wilshire Boulevard. A potential connection to Wilshire Boulevard was studied in a May 2009 Metro feasibility report. Although beyond the available project funding, this report determined that a connection at Wilshire/La Brea instead of Wilshire/Crenshaw would be more cost-effective and more compatible with existing land uses. Please refer to the Crenshaw Transit Corridor Project: Final Feasibility Study – Wilshire/La Brea Light Rail Transit Extension, available on the Crenshaw Transit Corridor Project page on the Metro website.

Keeping these recommendations in mind, the Westside Subway Extension Project, if approved for implementation, will be designed so as not to preclude future northward extensions of the Crenshaw/LAX line along La Brea, La Cienega, or San Vicente.

Please refer to Sections 2.3, 2.4, and 2.5 of the Final EIS/EIR for an overview of the development of alternatives, including station locations, and the LPA selection process. The Westside Subway Extension Alternatives Screening and Refinement Following Scoping Report provides a more detailed description of the refinements to the Wilshire/Crenshaw Station following Draft EIS/EIR scoping in response to community comments and engineering requirements. This report is available on the Metro Westside Subway Extension Project website: www.metro.net/projects/westside/westside-reports.
Your comment on future transit connections to a Sepulveda/I-405 line has been noted. The San Fernando Valley I-405 Corridor Connection is included in Metro's 2009 Long Range Transportation Plan and funding has been allocated in Measure R for the project. Metro will undertake planning studies for the corridor to identify the mode, alignment and appropriate connections to other area transit projects, including the Westside Subway Extension.

610-3
Your comment on future transit connections to a Sepulveda/I-405 line has been noted. Please see the response to comment 610-2 above.

Most respectfully,

Dave Frevele
622 S. Wall St. #A337
Los Angeles, CA 90014
Your support for Alternative 4 (Westwood/VA Hospital Extension plus West Hollywood Extension) has been noted. On October 28, 2010, the Metro Board of Directors identified Alternative 2 (Westwood/VA Hospital Extension) as the Locally Preferred Alternative (LPA). Only Alternatives 1 and 2 are affordable within the adopted Long Range Transportation Plan (LRTP), and between them, Alternative 2 provides significantly higher ridership and better cost effectiveness. Additionally, Alternative 2 serves the VA Hospital and other communities west of the I-405 more effectively. There is not adequate funding available in Measure R or other sources to construct Alternative 4 at this time.

However, the Draft EIS/EIR showed that there is a market for transit improvements serving West Hollywood, and this corridor is included in the Strategic Element of the 2009 Long Range Transportation Plan. Should funding be identified and secured, further study could be done to identify a project that would be competitive under Federal funding criteria.

Please refer to Sections 2.3, 2.4, and 2.5 of the Final EIS/EIR for an overview of the development of alternatives and the LPA selection process.
Your comment in support of the Century City Constellation Station has been noted. On October 28, 2010, the Metro Board of Directors identified Alternative 2 (Westwood/VA Hospital Extension) as the Locally Preferred Alternative (LPA). As part of the LPA selection, the Metro Board of Directors decided to continue to study both station location options in Century City (Santa Monica Boulevard and Constellation Boulevard) to address concerns raised by the community regarding locating a station directly on a seismic fault and the safety of tunneling under homes and schools.

In response to the Metro Board of Director’s request for more information, further analysis was undertaken to focus on the engineering and environmental aspects of the two options during the preparation of the Final EIS/EIR to expand on the studies conducted in preparation of the Draft EIS/EIR. It should be noted that prior to conducting the comparative study, the Santa Monica Boulevard Station location was shifted slightly to the east from the location in the Draft EIS/EIR to avoid the Santa Monica Fault zone.

The geotechnical studies conducted during preparation of the Final EIS/EIR concluded that tunneling can be safely carried out beneath the Beverly Hills High School campus and the West Beverly Hills, Century City, and Westwood neighborhoods. However, these studies also determined that the Century City Santa Monica Station would cross the West Beverly Hills Lineament, a northern extension of the active Newport-Inglewood Fault, which poses a significant safety risk to passengers at this station location. No evidence of faulting was found at the proposed Century City Constellation Station site.

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Based on all of these factors, the Century City Station Location Report concluded by recommending that the Century City Station be located along Constellation Boulevard due to seismic safety concerns at the Santa Monica Boulevard Station and higher ridership projections with Constellation Boulevard Station.

Please refer to Section 8.8.2 and 8.8.3 of the Final EIS/EIR for more detailed responses to concerns related to the Century City Station. Refer to Section 7.3 of the Final EIS/EIR and the Westside Subway Extension Century City Station Location Report for a comparison of the two Century City Station locations. The results of further geotechnical investigations in the Century City vicinity can be found in the Westside Subway Extension Century City Area
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130-1
My main concern for the subway stations on the Westside is that they have enough entrances. The Red Line in downtown Los Angeles suffers from a limited number of entrances/ports at each subway station. Whenever and wherever possible, Metro should work with property developers and even the owners of existing buildings to see if an entrance can be placed inside a building. In some cases, an entrance can be placed at the basement level or in the lobby of the buildings which will sit on top of the station at Century City and elsewhere. This sort of thing happens all over the place in Japan, and it places the subway on equal footing with the underground parking structures. It makes the station much more accessible.

I would also prefer for the Century City station to be placed at Constellation.
- James Fujita

130-2

The number of entrances at each station was based on the ridership projections for that station. Based on these projections, Metro will construct one station entrance at each of the proposed stations, with the exception of two station entrances at the Westwood/UCLA Station due to high ridership projections.

130-2
Your comment in support of the Century City Constellation Station has been noted. On October 28, 2010, the Metro Board of Directors identified Alternative 2 (Westwood/VA Hospital Extension) as the Locally Preferred Alternative (LPA). As part of the LPA selection, the Metro Board of Directors decided to continue to study both station location options in Century City (Santa Monica Boulevard and Constellation Boulevard) to address concerns raised by the community regarding locating a station directly on a seismic fault and the safety of tunneling under homes and schools.

In response to the Metro Board of Director’s request for more information, further analysis was undertaken to focus on the engineering and environmental aspects of the two options during the preparation of the Final EIS/EIR to expand on the studies conducted in preparation of the Draft EIS/EIR. It should be noted that prior to conducting the comparative study, the Santa Monica Boulevard Station location was shifted slightly to the east from the location in the Draft EIS/EIR to avoid the Santa Monica Fault zone.

The geotechnical studies conducted during preparation of the Final EIS/EIR concluded that tunneling can be safely carried out beneath the Beverly Hills High School campus and the West Beverly Hills, Century City, and Westwood neighborhoods. However, these studies also determined that the Century City Santa Monica Station would cross the West Beverly Hills Lineament, a northern extension of the active Newport-Inglewood Fault, which poses a significant safety risk to passengers at this station location. No evidence of faulting was found at the proposed Century City Constellation Station site.

In addition, the Century City Constellation Boulevard Station has the best pedestrian environment, can be expected to attract the most transit riders, and is centrally located to help shape the redevelopment of Century City as an important transit-oriented destination on the Westside Subway Extension. Further refinements to the ridership analysis concluded that the Century City Constellation Station would result in 3,350 more boardings along new Westside Subway Extension stations than the Century City Santa Monica Station due to proximity to jobs and residences within the critical 600-foot and 1/4-mile walksheds.

Based on all of these factors, the Century City Station Location Report concluded by recommending that the Century City Station be located along Constellation Boulevard due to seismic safety concerns at the Santa Monica Boulevard Station and higher ridership projections with Constellation Boulevard Station.
Please refer to Section 8.8.2 and 8.8.3 of the Final EIS/EIR for more detailed responses to concerns related to the Century City Station. Refer to Section 7.3 of the Final EIS/EIR and the Westside Subway Extension Century City Station Location Report for a comparison of the two Century City Station locations. The results of further geotechnical investigations in the Century City vicinity can be found in the Westside Subway Extension Century City Area Fault Investigation Report and the Westside Subway Extension Century City Area Tunneling Safety Report. The results of further ridership studies can be found in the Westside Subway Extension Technical Report Summarizing the Results of the Forecasted Alternatives and the Westside Subway Extension Century City TOD and Walk Access Study. All reports are available on the Metro Westside Subway Extension Project website: www.metro.net/projects/westside/westside-reports.
Dear Metro,

I support the subway.

Please put the Century City station at Santa Monica, not Constellation. Use the money saved for a large parking structure at the end of the line and improvements to streetscape at Santa Monica and Avenue of the Stars.

Thank You,

Hank

134-1

Your comment in support of the Westside Subway Extension Project has been noted. On October 28, 2010, the Metro Board of Directors identified Alternative 2 (Westwood/VA Hospital Extension) as the Locally Preferred Alternative. Only Alternatives 1 and 2 are affordable within the adopted Long Range Transportation Plan, and between them, Alternative 2 provides higher ridership and improved cost effectiveness. Additionally, Alternative 2 serves the VA Hospital and other communities west of the I-405 more effectively.

Please refer to Sections 2.3, 2.4, and 2.5 of the Final EIS/EIR for an overview of the development of alternatives and the LPA selection process.

134-2

Your comment in support of the Century City Santa Monica Station has been noted. On October 28, 2010, the Metro Board of Directors identified Alternative 2 (Westwood/VA Hospital Extension) as the Locally Preferred Alternative (LPA). As part of the LPA selection, the Metro Board of Directors decided to continue to study both station location options in Century City (Santa Monica Boulevard and Constellation Boulevard) to address concerns raised by the community regarding locating a station directly on a seismic fault and the safety of tunneling under homes and schools.

In response to the Metro Board of Director’s request for more information, further analysis was undertaken to focus on the engineering and environmental aspects of the two options during the preparation of the Final EIS/EIR to expand on the studies conducted in preparation of the Draft EIS/EIR. It should be noted that prior to conducting the comparative study, the Santa Monica Boulevard Station location was shifted slightly to the east from the location in the Draft EIS/EIR to avoid the Santa Monica Fault zone.

The geotechnical studies conducted during preparation of the Final EIS/EIR concluded that tunneling can be safely carried out beneath the Beverly Hills High School campus and the West Beverly Hills, Century City, and Westwood neighborhoods. However, these studies also determined that the Century City Santa Monica Station would cross the West Beverly Hills Lineament, a northern extension of the active Newport-Inglewood Fault, which poses a significant safety risk to passengers at this station location. No evidence of faulting was found at the proposed Century City Constellation Station site.

In addition, the Century City Constellation Boulevard Station has the best pedestrian environment, can be expected to attract the most transit riders, and is centrally located to help shape the redevelopment of Century City as an important transit-oriented destination on the Westside Subway Extension. Further refinements to the ridership analysis concluded that the Century City Constellation Station would result in 3,350 more boardings along new Westside Subway Extension stations than the Century City Santa Monica Station due to proximity to jobs and residences within the critical 600-foot and 1/4-mile vicinity.
Based on all of these factors, the Century City Station Location Report concluded by recommending that the Century City Station be located along Constellation Boulevard due to seismic safety concerns at the Santa Monica Boulevard Station and higher ridership projections with Constellation Boulevard Station.

Please refer to Section 8.8.2 and 8.8.3 of the Final EIS/EIR for more detailed responses to concerns related to the Century City Station. Refer to Section 7.3 of the Final EIS/EIR and the Westside Subway Extension Century City Station Location Report for a comparison of the two Century City Station locations including the costs. The results of further geotechnical investigations in the Century City vicinity can be found in the Westside Subway Extension Century City Area Fault Investigation Report and the Westside Subway Extension Century City Area Tunneling Safety Report. The results of further ridership studies can be found in the Westside Subway Extension Technical Report Summarizing the Results of the Forecasted Alternatives and the Westside Subway Extension Century City TOD and Walk Access Study. All reports are available on the Metro Westside Subway Extension Project website: www.metro.net/projects/westside/westside-reports.
RECORD #526 DETAIL
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Status : Submission Summarized
Record Date : 10/18/2010
Submission Date : 10/18/2010
First Name : Hank
Last Name : Fung
Group Affiliation :
Your comment on the Wilshire/Crenshaw Station has been noted. In October 2010, the Metro Board of Directors identified Alternative 2 (Westwood/VA Extension) as the Locally Preferred Alternative (LPA). A Wilshire/Crenshaw Station was not included in the LPA.

The Wilshire/Crenshaw Station would be located in the Park Mile section of Wilshire Boulevard, adjacent to lower density land uses that are not planned for future growth in the adopted Community Plan and Park Mile Specific Plan. This site is only 0.5 mile from the existing Wilshire/Western Station and does not serve a major north south intersection, as Crenshaw Boulevard terminates at Wilshire Boulevard and does not extend to the north. Because this is a comparatively lower ridership station with a cost of $153 million, eliminating this station from the LPA improves the cost-effectiveness of Alternative 2. Furthermore, future connections from the Westside subway stations along Wilshire Boulevard to the planned Crenshaw/LAX Light Rail Transit project to the south have been recommended to take place at La Brea, La Cienega, or San Vicente rather than at Wilshire/Crenshaw.

Excavating an undeveloped station box for the potential future development of a Wilshire/Crenshaw Station is also not a viable option at this time. The cost of excavating an empty box for a future station adds a considerable cost to the Project and such a station has not been approved at this time for the future (approximately $70 million) or included in the LPA. Additionally, if the station is developed in the future, the process of constructing a full station from an undeveloped station box while the system is operational would present technical challenges that would further increase the station construction costs and would be disruptive to the existing service.

A station in the Wilshire/Masselin vicinity was not considered as part of the Alternatives Analysis. Subway stations are typically spaced one-mile apart and located near major arterials to facilitate bus transfers and other transportation connections. The Wilshire/La Brea and Wilshire/Fairfax Stations would be spaced approximately one mile apart, and, therefore, there would be no need for an intermediate station.

Please refer to Sections 2.3, 2.4, and 2.5 of the Final EIS/EIR for an overview of the development of alternatives, including station locations, and the LPA selection process. The Westside Subway Extension Alternatives Screening and Refinement Following Scoping Report provides a more detailed description of the refinements to the Wilshire/Crenshaw Station following Draft EIS/EIR scoping in response to community comments and engineering requirements. This report is available on the Metro Westside Subway Extension Project website: www.metro.net/projects/westside/westside-reports.
Metro and the Southern California Association of Governments, which followed Federal Transit Administration (FTA) guidance and meets FTA’s goals: to have the model tell a coherent story about travel behavior, reliably reproduce current travel patterns, and ensure a rational response to change. Metro’s travel demand model is a resident model stratified by three income levels and includes the three standard trip purposes of Home-Based Work, Home-Based Other, and Non-Home Based, plus the additional trip purpose of Home-Based University. The model does not include tourism or special events.

The modeling effort included FTA’s participation throughout the process and a final review was held in September 2009 during which FTA concurred that the model was ready for application to this Project. The model was calibrated with 2001 and 2006 on-board survey data and then validated against transit ridership information to ensure it properly represents travel activity for the Los Angeles County and regional transportation system.

Potential additional local bus services at subway stations along the Westside Subway Extension were evaluated as part of the Final EIS/EIR. Any provision of shuttle service could add more subway riders, although the magnitude of increase is subject to analysis using the travel forecasting model. To help guide design of subway stations, potential provisions for enhanced local bus service at stations is being assessed, but enhanced bus service itself is beyond the scope of this project.

Please refer to Section 8.8.9 of the Final EIS/EIR for more detailed responses to concerns related to ridership. Please refer to Section 3.2.1 of the Final EIS/EIR for more information on ridership forecasting methodology. In addition, the Los Angeles Mode Choice Model: Calibration/Validation Report provide detailed information about the ridership model and the Westside Subway Extension Technical Report Summarizing the Results of the Forecasted Alternatives provides a summary of the results. The Technical Report Summarizing the Results of the Forecasted Alternatives is available on the Metro Westside Subway Extension Project website: www.metro.net/projects/westside/westside-reports.

Your comment in support of the Century City Santa Monica Station has been noted. On October 28, 2010, the Metro Board of Directors identified Alternative 2 (Westwood/VA Hospital Extension) as the Locally Preferred Alternative (LPA). As part of the LPA selection, the Metro Board of Directors decided to continue to study both station location options in Century City (Santa Monica Boulevard and Constellation Boulevard) to address concerns raised by the community regarding locating a station directly on a seismic fault and the safety of tunneling under homes and schools.

In response to the Metro Board of Director’s request for more information, further analysis was undertaken to focus on the engineering and environmental aspects of the two options during the preparation of the Final EIS/EIR to expand on the studies conducted in
preparation of the Draft EIS/EIR. It should be noted that prior to conducting the comparative study, the Santa Monica Boulevard Station location was shifted slightly to the east from the location in the Draft EIS/EIR to avoid the Santa Monica Fault zone.

The geotechnical studies conducted during preparation of the Final EIS/EIR concluded that tunneling can be safely carried out beneath the Beverly Hills High School campus and the West Beverly Hills, Century City, and Westwood neighborhoods. However, these studies also determined that the Century City Santa Monica Station would cross the West Beverly Hills Lineament, a northern extension of the active Newport-Inglewood Fault, which poses a significant safety risk to passengers at this station location. No evidence of faulting was found at the proposed Century City Constellation Station site.

In addition, the Century City Constellation Boulevard Station has the best pedestrian environment, can be expected to attract the most transit riders, and is centrally located to help shape the redevelopment of Century City as an important transit-oriented destination on the Westside Subway Extension. Further refinements to the ridership analysis concluded that the Century City Constellation Station would result in 3,350 more boardings along new Westside Subway Extension stations than the Century City Santa Monica Station due to proximity to jobs and residences within the critical 600-foot and 1/4-mile walksheds.

Based on all of these factors, the Century City Station Location Report concluded by recommending that the Century City Station be located along Constellation Boulevard due to seismic safety concerns at the Santa Monica Boulevard Station and higher ridership projections with Constellation Boulevard Station.

Please refer to Section 8.8.2 and 8.8.3 of the Final EIS/EIR for more detailed responses to concerns related to the Century City Station. Refer to Section 7.3 of the Final EIS/EIR and the Westside Subway Extension Century City Station Location Report for a comparison of the two Century City Station locations. The results of further geotechnical investigations in the Century City vicinity can be found in the Westside Subway Extension Century City Area Fault Investigation Report and the Westside Subway Extension Century City Area Tunneling Safety Report. The results of further ridership studies can be found in the Westside Subway Extension Technical Report Summarizing the Results of the Forecasted Alternatives and the Westside Subway Extension Century City TOD and Walk Access Study. All reports are available on the Metro Westside Subway Extension Project website: www.metro.net/projects/westside/westside-reports.

Your preference for the Off-Street location of the Westwood/UCLA Station has been noted.

On October 28, 2010, the Metro Board of Directors identified Alternative 2 (Westwood/VA Hospital Extension) as the Locally Preferred Alternative (LPA). As part of the LPA selection,
the Metro Board decided to continue to study both Westwood/UCLA station location options (On-Street and Off-Street).

A comparative study of the two proposed Westwood/UCLA station locations, including engineering, costs, urban design, and environmental impact considerations, was conducted during the Final EIS/EIR phase to expand on the studies conducted in preparation of the Draft EIS/EIR.

The Off-Street Station and tunnels would need to be deeper than the On-Street Station to clear the underside of foundations for a future hotel on Gayley Avenue, which makes the station and tunnels riskier and more expensive to construct, and requires more time for transit riders to travel between the platform and the station entrance. Additionally, the Westwood/UCLA Off-Street Station location would require approximately 13 additional permanent underground easements.

The On-Street Station location would provide at least one of entrance at the corner of Wilshire and Westwood Boulevards. This entrance location would provide better access to bus connections along Westwood Boulevard and would be closer to the major office buildings and Westwood Village than the entrances for the Off-Street Station. Furthermore, one of the station entrance options for the On-Street Station is a split entrance between the north and south sides of Wilshire Boulevard, providing access to both sides of busy Wilshire Boulevard. However, the Westwood/UCLA On-Street Station option is also expected to have greater traffic impacts during construction due to in-street construction along Wilshire Boulevard.

Based on these factors, the recommendation is to locate the Westwood/UCLA Station On-Street as this location could accommodate an entrance at the Wilshire Boulevard and Westwood Boulevard intersection, providing better pedestrian access to Westwood Village and connections along Westwood Boulevard.

Please refer to Section 8.8.6 of the Final EIS/EIR for more detailed responses to concerns related to the Westwood/UCLA Station. Please refer to Sections 2.3, 2.4, and 2.5 of the Final EIS/EIR for an overview of the development of alternatives, including station locations, and the LPA selection process. The Westside Subway Extension Alternatives Screening and Refinement Following Scoping Report provides a more detailed description of the refinements to the Westwood/UCLA Station following Draft EIS/EIR scoping in response to community comments and engineering requirements. 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/UCLA locations. In addition, the Westside Subway Extension Station Entrance Location Report and Recommendations provides a comparison of the potential entrance locations at Westwood Boulevard, Gayley Avenue and Veteran Avenue for both the On-
Street and Off-Street Stations. All reports are available on the Metro Westside Subway Extension Project website: www.metro.net/projects/westside/westside-reports.

Your comment has been noted. Headways are now assumed to be 4 minutes and not 3.3. Please see Chapter 2 of the Final EIS/EIR for more information.

Your comments about parking have been noted. Park-and-ride can be an important mode of access to transit. However, these facilities are usually located in low-density areas that lack local bus service feeding the stations. That is not the case with this Project. Therefore, none of the stations proposed as part of the Project will provide parking.

The provision of park-and-ride facilities would be inconsistent with the purpose and need of the Project. The Project Study Area is already very congested and Metro seeks to discourage people from driving to access the subway. Park-and-ride facilities also could lead to increased auto use and potentially result in traffic impacts at intersections.

The provision of park-and-ride facilities also would be inconsistent with both the existing built environment surrounding stations and efforts to encourage transit-oriented development. The Project corridor is very dense due to medium and high density commercial and residential development. The construction of park-and-ride facilities would consume space that could be put to more productive residential and commercial uses.

Any added park-and-ride facilities would have major implications on Project costs. The study area also has very high land costs and there is lack of available parcels for park-and-ride development. Due to land costs and scarcity, any parking would need to be in multi-story garages, resulting in substantially higher capital costs than current estimates.

Please refer to Section 8.8.8 of the Final EIS/EIR for more detailed responses to concerns related to parking. In addition, Section 3.6 of the Final EIS/EIR estimates the demand for parking at the stations and provides an analysis of potential spillover parking impacts to surrounding communities.
the VA Hospital where a large parking structure can be constructed (2000+ parking spaces) is important. There will be individuals for which connecting transit service will not be amenable, and these include both workers in the Westside as well as residents. The traffic impacts of such a parking structure should be evaluated in future environmental studies. This will also help alleviate the spillover parking issue, especially at the terminal station.

I do commend the MTA staff for engaging with social media, however, I do not understand why social media comments cannot be included in the official record. This does not mean comments on offsite blogs, etc., but comments directly to the official MTA Facebook account and Twitter account for this project. In the future, those comments should be included and responded to in the EIR the same as comments such as these.

Sincerely,
Hank Fung, P.E.
I would like to let you know that I am NOT happy to have the extension go under my home. I live on the 200 block of Roxbury Drive in Beverly Hills, CA, and I work in Century City. I would like this to go on record that to drill under my home and the only High School our city has, is poor judgment on all of you considering this. Please do not drill under our homes and High School, stick to the original Plan to go Wilshire Blvd. and Santa Monica Blvd.
Safety, both during construction and eventual operations, is one of Metro’s highest priorities and is one of the key evaluation criteria in selection of the Locally Preferred Alternative (LPA). In response to the Metro Board of Director’s request for more information, further analysis was undertaken to focus on the engineering and environmental aspects of the two options during the preparation of the Final EIS/EIR to expand on the studies conducted in preparation of the Draft EIS/EIR. It should be noted that prior to conducting the comparative study, the Santa Monica Boulevard Station location was shifted slightly to the east from the location in the Draft EIS/EIR to avoid the Santa Monica Fault zone.

On most transit tunnel projects, significant portions of the alignment are constructed adjacent to or beneath buildings. The LPA passes beneath homes and schools in these neighborhoods because the curve radius required for subway tunnels is much wider than that required at a typical surface street intersection. The current alignment minimizes tunneling under buildings to the east and west of both the Century City Stations. The station position on Constellation Boulevard requires the tunnel alignment to be under the south portion of Beverly Hills High School Building B in order to reach the station location. There is no reasonable tunnel alignment that does not pass under homes or structures within the Beverly Hills High School campus.

The geotechnical studies conducted during preparation of the Final EIS/EIR concluded that tunneling can be safely carried out beneath the Beverly Hills High School campus and the West Beverly Hills, Century City, and Westwood neighborhoods. The use of state-of-the-art pressurized closed-face TBMs for soft-ground tunneling has greatly improved the control of ground movements such that tunneling can be done with minimal surface settlements. The presence of the tunnels will neither affect the risk to buildings above them during an earthquake nor change the severity of shaking. Finally, tunnels can be constructed and operated safely in gassy grounds and oil wells do not pose an unmitigable risk to tunneling.

The additional detailed geotechnical studies also assessed soil conditions and determine the potential for noise or vibration impacts on the surface along the refined alignments. These studies concluded that the predicted vibration and noise levels are within the FTA requirements and operation of the subway is not anticipated to have adverse impacts with the implementation of mitigation, including areas where the tunnels pass beneath homes and schools. During construction, low levels of noise and vibration may be experienced for a day or two as each of the two TBMs pass under a given location. In addition, as the tunnels are driven, construction trains bring supplies to and from the tunnel heading. However, these underground construction noises will also be controlled to be within Metro criteria.

The Westside Subway Extension will not reduce the availability of BHHS for use as...
emergency shelter or impact the operations of its use as an emergency shelter. Furthermore, tunneling would not prevent future development of the BHHS campus. The vertical alignment of the tunnel would be 55 to 70 feet below the ground surface (to the top of the tunnel), which would allow for construction of an underground structure over the tunnel at a later date.

These geotechnical studies also determined that the Century City Santa Monica Station would cross the West Beverly Hills Lineament, a northern extension of the active Newport-Inglewood Fault, which poses a significant safety risk to passengers at this station location. No evidence of faulting was found at the proposed Century City Constellation Station site. Tunnels to the east and west of Century City pass through at least two active faults. However, there are numerous tools, designs, and construction means and methods that have been used elsewhere that can be used to safely tunnel through these fault zones.

In addition, the Century City Constellation Boulevard Station has the best pedestrian environment, can be expected to attract the most transit riders, and is centrally located to help shape the redevelopment of Century City as an important transit-oriented destination on the Westside Subway Extension. Further refinements to the ridership analysis concluded that the Century City Constellation Station would result in 3,350 more boardings along new Westside Subway Extension stations than the Century City Santa Monica Station due to proximity to jobs and residences within the critical 600-foot and 1/4-mile walksheds.

Based on all of these factors, the Century City Station Location Report concluded by recommending that the Century City Station be located along Constellation Boulevard due to seismic safety concerns at the Santa Monica Boulevard Station and higher ridership projections with Constellation Boulevard Station.

Please refer to Section 8.8.2 and 8.8.3 of the Final EIS/EIR for more detailed responses to concerns related to the Century City Station and alignments and Section 8.8.4 of the Final EIS/EIR for a more detailed response to geotechnical concerns. Refer to Section 7.3 of the Final EIS/EIR and the Westside Subway Extension Century City Station Location Report for a comparison of the two Century City Station locations. The results of further geotechnical investigations in the Century City vicinity can be found in the Westside Subway Extension Century City Area Fault Investigation Report and the Westside Subway Extension Century City Area Tunneling Safety Report. The results of further ridership studies can be found in the Westside Subway Extension Technical Report Summarizing the Results of the Forecasted Alternatives and the Westside Subway Extension Century City TOD and Walk Access Study. All reports are available on the Metro Westside Subway Extension Project website: www.metro.net/projects/westside/westside-reports.