Office of the City Engineer

Los Angeles, California

To the Public Works Committee

Of the Honorable Council

Of the City of Los Angeles

NOV 0 5 2014

Honorable Members:

C. D. No. 15

SUBJECT:

VACATION APPROVAL - VAC- E1400813 – Council File No. 02-1713 – Grant Street and Southern Pacific Drive Vacation District.

RECOMMENDATIONS:

A. That street vacation proceedings pursuant to the Public Streets, Highways and Service Easements Vacation Law be instituted for the vacation of the public rights-of-way indicated below and shown colored blue on the attached Exhibit "C":

1. Portion of Grant Street from its westerly terminus to approximately 60 feet easterly of Farragut Avenue.

2. Schley Avenue between Grant Street and Southern Pacific Drive and from the Southern Pacific Company Railroad R/W to approximately 20 feet southerly thereof.

3. MacDonough Avenue between Grant Street and Southern Pacific Drive.

4. Cushing Avenue between Grant Street and Southern Pacific Drive.

5. Foote Avenue between Grant Street and Southern Pacific Drive.

6. Portions of Farragut Avenue from Grant Street to approximately 120 feet southerly thereof and from Southern Pacific Drive to approximately 60 feet northerly thereof.

7. East Opp Street between Foote Avenue and Perry Avenue.

8. Portion of Southern Pacific Drive north of the Southern Pacific Company Railroad R/W from its westerly terminus to Perry Avenue.

9. Portion of the alley east of Farragut Avenue from East Opp Street to approximately 345 feet southerly thereof.

10. Southern Pacific Drive south of the Southern Pacific Company Railroad R/W between Pennington Avenue and Sampson Avenue.

11. The alley south of the Southern Pacific Company Railroad R/W between Sampson Avenue and MacDonough Avenue.

12. Pennington Avenue from Southern Pacific Drive south of the Southern Pacific Company Railroad R/W to approximately 205 feet southerly thereof.

13. Sampson Avenue from Southern Pacific Drive south of the Southern Pacific Company Railroad R/W to approximately 69 feet southerly thereof.

B. That the vacation of the area shown colored orange on Exhibit "C", be denied.

C. The City Council finds that it has imposed all the mitigation measures that are within the control of the City, as described in the Final Environmental Impact Report (State Clearinghouse # 90011169) that is associated with the impacts of the street vacation and that the other mitigation measures that are not within the authority of the City, have been or should be imposed as set forth in the findings of the Alameda Corridor Transportation Authority Governing Board, dated January 4, 1993, a copy of which is attached and incorporated.

D. The City Council finds that no new information exists to show that the project or circumstances of the project have been changed to require additional environmental review, as described in State CEQA Guidelines 15162, and therefore the existing environmental documents adequately describe the potential impacts for this street vacation.

E. That, in conformance with Section 556 of the City Charter, the Council make the findings that the vacation is in substantial conformance with the purposes, intent and provisions of the General Plan.

F. That, in conformance with Section 892 of the California Streets and Highways Code, the Council determines that the vacation areas are not needed for nonmotorized transportation facilities.

G. That, in conformance with Section 8324 of the California Streets and Highways Code, the Council determines that the vacation areas are not necessary for present or prospective public use.

H. That the Council adopt the City Engineer's report with the conditions contained therein.

I. That the City Clerk schedule the vacation for public hearing at least 30 days after the Public Works Committee approval so the City Clerk and Engineering can process the Public Notification pursuant to Section 8324 of the California Streets and Highways Code.

J. That the payment of the processing fees for the vacation proceedings be waived in accordance with Section 7.46 of the Administrative Code which exempts all governmental agencies.

K. That the processing costs for the vacation proceedings be borne by the City.

FISCAL IMPACT STATEMENT:

To date, an estimated $10,000.00 in charges have been expended in the investigation and processing of this proceeding. Since Section 7.46 of the Administrative Code exempts all governmental agencies from payment of fees, the processing of this report will be absorbed by the Bureau of Engineering.
Maintenance of the public easement by City forces will be eliminated.

NOTIFICATION:

That notification of the time and place of the Public Works Committee and the City Council meetings to consider this request be sent to:

1. The Port of Long Beach
Attn: Director of Properties
P. O. Box 570
Long Beach, CA 90801

2. The Port of Los Angeles
Attn: Director of Property Management
P. O. Box 151
San Pedro, CA 90733-0151

3. Harbor Department
Attn: James Townsend
425 S. Palos Verdes Street
San Pedro, CA 90731

4. AJC Sandblasting Inc.
932 Schley Avenue
Wilmington, CA 90744

5. Gutierrez, Rigoberto G.
1640 E. Charlinda Street #B
West Covina, CA 91791

6. Daniel Campbell
444 W. Ocean Boulevard, Suite 800
Long Beach, CA 90802

7. Global Oil Production LLC
2209 E. I Street
Wilmington, CA 90744

8. Randy Fishfader
2401 E. Anaheim Street
Wilmington, CA 90744

9. Southern California Edison Co.
Attn: Jane Stone
Corporate Real Estate
14803 Chestnut Street
Westminster, CA 92683-9912

10. Turner, Genobia
1428 E. Gladwick Street
Carson, CA 90746

11. Fastlane Transportation, Inc.
Attn: Patrick Wilson
2400 E. Pacific Coast Highway
Wilmington, CA 90744

CONDITIONS:

The Conditions specified in this report are established as the requirements to be complied with by the petitioner for this vacation. Vacation proceedings in which the conditions have not been completed within 180 days of the Council's action on the City Engineer's report and without proper time extension, shall be terminated with no further Council action.

1. That a suitable map, approved by the Harbor District Engineering office, delineating the limits (including bearing and distances) of the areas to be vacated be submitted to the Land Development Group of the Bureau of Engineering prior to the preparation of the Resolution to Vacate.

2. That a suitable legal description describing the areas being vacated and all easements to be reserved, including copies of all necessary supporting documentation, be submitted to the Land Development Group of the Bureau of Engineering prior to preparation of the Resolution to Vacate.

3. That title reports indicating the vestee of the underlying fee title interest in the areas to be vacated be submitted to the City Engineer.

4. That Foote Avenue, designated as a Collector Street, be redesignated to a Local Street. The petitioner shall initiate proceedings by applying to the Department of City Planning.

5. That the petitioner provides adequate dedications for turning areas along the termini of Schley Avenue and Sampson Avenue that are to remain in a manner satisfactory to the City Engineer.

6. That the petitioner construct the following improvements in a manner satisfactory to the City Engineer:

    a. Construct standard street improvements along Farragut Avenue.

    b. Construct standard street improvements along Grant Street east of Farragut Avenue.

7. That arrangements be made with the Department of Water and Power, Southern California Edison, Southern California Gas Company, Valero Wilmington Refinery, Tosco Distribution Company, Verizon, and Phillips Petroleum Company for the removal of affected facilities or the providing of easements or rights for the protection of affected facilities to remain in place.

8. That satisfactory arrangements be made with the City Engineer for the relocation or abandonment of the storm drain facilities located within the areas to be vacated, unless easements are reserved from the vacation for their protection.

9. That an ingress-egress easement be reserved in the Resolution to Vacate for the use of the Fire Department and other public service vehicles over that portion of Grant Street from Farragut Avenue to 820 feet westerly thereof.

10. That street lighting facilities be installed or removed as required by the Bureau of Street Lighting.

11. That street trees be planted and tree wells be installed as may be required by the Street Tree Division of the Bureau of Street Services.

12. That consents to the vacation be secured from owners of property adjoining the areas to be vacated.

TRANSMITTAL:

Application dated July 8, 2002, from the Alameda Corridor Transportation Authority.

DISCUSSION:

Request: The petitioner, Alameda Corridor Transportation Authority, owner or proposed owner of the properties shown outlined in yellow on Exhibit "C", is requesting the vacation of the public streets and alleys shown colored blue and orange. They are requesting the vacation to consolidate the areas for the purpose of building a maintenance yard facility to provide maintenance and equipment areas as well as to service the Alameda Corridor project. The petitioner had claimed that they will acquire all of the properties surrounding the proposed vacation areas.

This vacation procedure is being processed under Council File No. 01-1459 adopted by the Los Angeles City Council on March 5, 2002.

Resolution to Vacate: The Resolution to Vacate will be recorded upon compliance with the conditions established for this vacation.

Previous Council Action: The City Council on August 14, 2002, under Council File No. 02-1713 adopted a Rule 16 Motion initiating street vacation proceedings.

Zoning and Land Use: The properties surrounding the proposed vacation areas are zoned M3-1VL and are vacant lots.

Description of Areas to be Vacated: The streets sought to be vacated are all unimproved local streets inaccessible for vehicular travel. The alleys are dedicated either 15 feet or 12 feet wide and are also unimproved and inaccessible. Foote Avenue designated as a collector street, is barricaded and closed for vehicular traffic at the southerly end of the intersection with Southern Pacific Drive. Grant Street is dedicated 30 feet wide. East Opp Street is dedicated 80 feet wide and Southern Pacific Drive south of the Southern Pacific Company Railroad Company is dedicated 50 feet wide.

Adjoining Streets and Alleys: Most of the adjoining streets and alleys to the vacation areas are unimproved streets. Schley Avenue south of the proposed vacation area is a partially improved local street dedicated 60 feet wide with a 40-foot wide asphalt concrete roadway including a concrete curb and gutter on the westerly side only. There is no sidewalk within this street.

Surrounding Properties: The adjoining property owners have been notified of the proposed streets and alleys vacation.

Effects of Vacation on Circulation and Access: The vacation of the public streets and alleys should not have any adverse effect on vehicular circulation or access since all of the proposed streets and alleys are unimproved and inaccessible for vehicular travel.

The streets and alleys are also not needed for the use of pedestrians, bicyclists or equestrians.

Objections to the Vacation: Mr. Patrick Wilson of Fastlane Transportation, Inc., owner of properties adjoining the proposed vacation areas objected to these vacations. He indicated in his letter, dated August 25, 2002, that the vacation of Foote Avenue north of the Southern Pacific Company Railroad R/W or any portion thereof would severely affect his trucking and container storage business due to the increase in distance its trucks would have to travel through an alternate route, thus adding to his operational cost of the business as well as traffic pollution.

He is also opposing to the vacation of Grant Street between Farragut Avenue and Perry Avenue by stating that "prior to condemnation, our company leased the property abutting Grant Street (on the north side) between Farragut Avenue and Perry Avenue. While we no longer lease this portion of property, we continue to lease the non-condemned portion (north of the railroad tracks), and still a part of that lease is a private rail crossing

agreement that entitles our company to cross the tracks and access Grant Street. Granting a street vacation for Grant Street will have the effect of denying us access to a public right of way after crossing the tracks, an incalculable value to us due to the fact that our company is already severely impacted by a shortage of rail crossings, and the elimination of one more crossing will have a monumentally negative impact on our operation."

Furthermore, he is objecting the vacation of that portion of Perry Avenue because the vacation would eliminate access to his leased properties.

Note: A letter, dated December 9, 2002, was received from Mr. David A. Moritz of the Alameda Corridor Engineering Team concluding that the ACTA's proposal to vacate public streets will not eliminate access to Fastlane's properties. He indicated that Fastlane Transportation, Inc. is the fee owner of three contiguous parcels northeasterly of the proposed street vacation area and that ACTA's proposal to vacate and construct improvements to certain public streets shown on the map titled "Long Beach Leads Extension right of Way Exhibit Street Vacation Map" (Drawing No. SE-RE849, Rev. C, Dated 6/11/02) would improve Fastlane's access to his properties.

He stated "A review of ACTA's construction plans, and a review of said Exhibit confirms that ACTA's construction work will not eliminate any existing access to Fast Lane's fee owned property from existing public streets, and in fact improves Fast Lane's access by avoiding the former railroad crossing."

Support of the Vacation: A letter, dated July 10, 2003, was received from Mr. Sid Robinson of the Port of Los Angeles supporting this vacation project provided that an easement for access for the use of the Fire Department across portions of Opp Street, Foote Avenue, and Grant Street to the tank farms and chemical plants north of the San Pedro Subdivision of the former Union Pacific Railroad be reserved.

Note: The Fire Department states in a letter dated August 26, 2002 that they have no conditions or objections to this vacation.

Reversionary Interest: No determinations of the underlying fee interest of the vacation areas have been made as to title or reversionary interest.

Dedications and Improvements: It will be necessary that the petitioner provide for the dedications and improvements as outlined under Conditions.

Sewers and Storm Drains: There are no existing sewer facilities within the areas proposed to be vacated. There are, however, existing storm drain facilities within these areas.

Public Utilities: The Department of Water and Power, Southern California Edison, Southern California Gas Company, Valero Wilmington Refinery, Tosco Distribution Company, Verizon, and Phillips Petroleum Company maintain facilities in the areas proposed to be vacated.

Tract Map: Since the required dedications can be acquired by separate instruments and the necessary improvements can be constructed under separate permit processes, the requirement for the recordation of a new tract map could be waived.

City Department of Transportation: The Department of Transportation states that based on traffic considerations, the vacation of the area shaded in blue is not opposed if through the requirements of a tract map or by other means, provisions are made for 1) lot consolidation, 2) driveway and access approval by DOT, and 3) any additional dedications and improvements necessary to bring all adjacent streets into conformance with the City's standard street dimensions.

City Fire Department: The Fire Department states that they have no objection to this vacation request.

Department of City Planning: The Department of City Planning did not respond to the Bureau of Engineering's referral letter dated August 6, 2002.

Conclusion: The vacation of the public streets and alleys as shown colored blue on attached Exhibit "B" could be conditionally approved based upon the following:

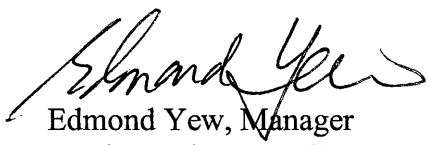
1. They are unnecessary for present or prospective public use.

2. They are not needed for vehicular circulation or access.

3. They are not needed for nonmotorized transportation purposes.

The area shown colored orange should not be vacated because it is needed for public street purposes.

Respectfully submitted,

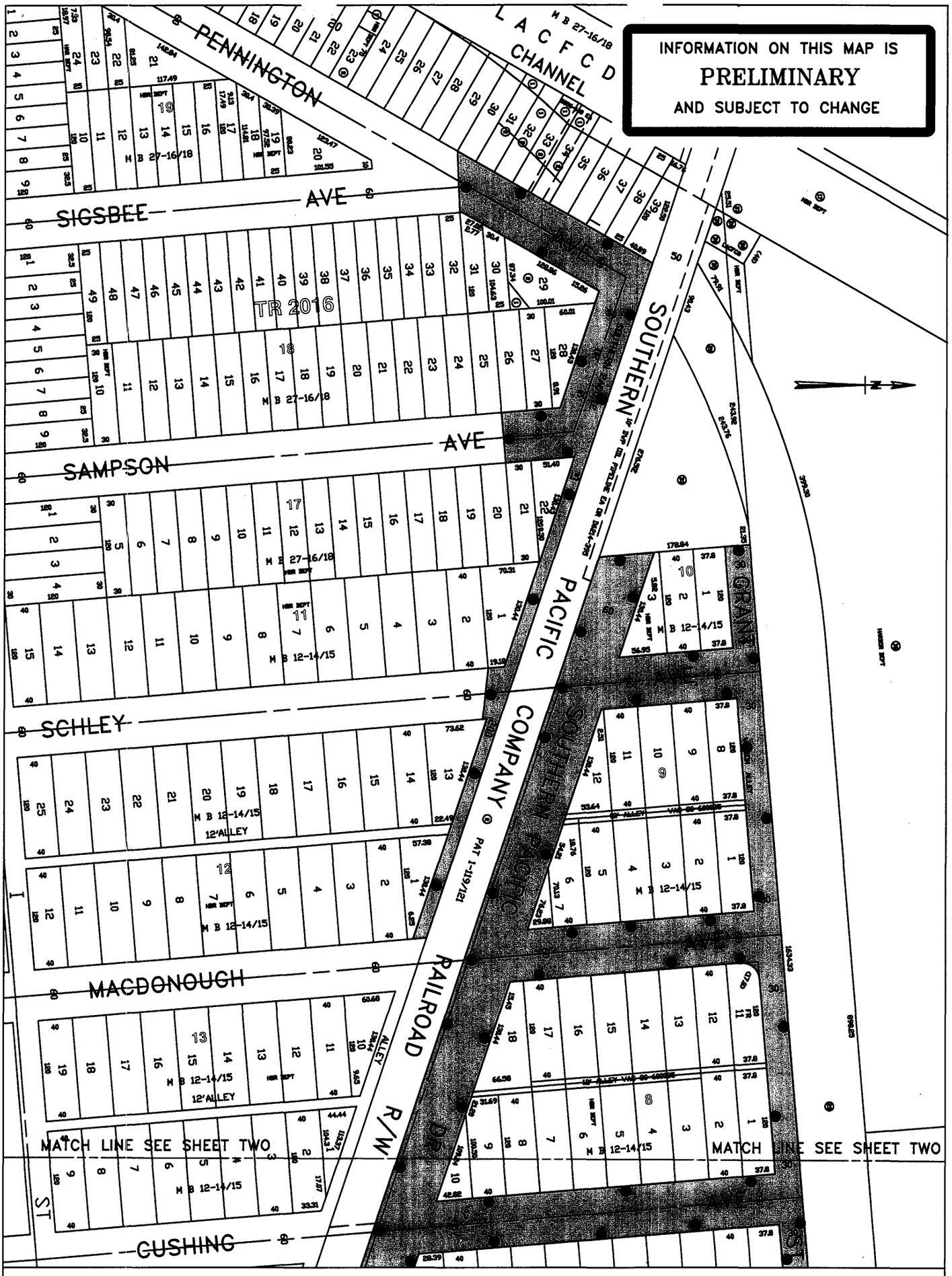


Edmond Yew, Manager
Land Development Group
Bureau of Engineering

Report prepared by:

Phillip Martinez
Civil Engineering Associate II
(213) 977-6954

EY/DKS/pm
E1400813_grant



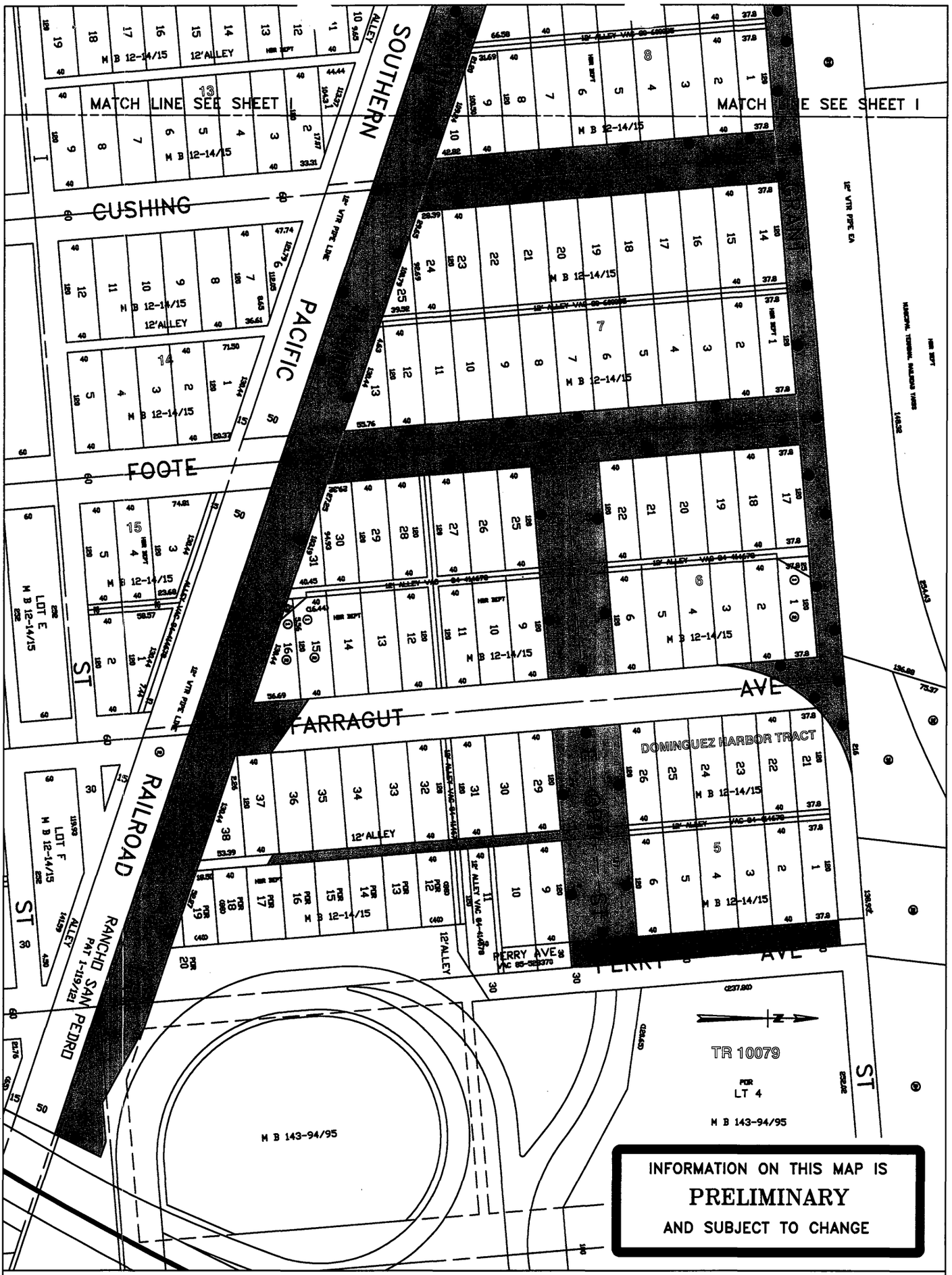
TITLE: GRANT STREET AND SOUTHERN PACIFIC DRIVE VACATION DISTRICT.

WORK ORDER NO. VAC- E1400813
COUNCIL FILE NO. 02-1713
COUNCIL DIST. 15 **DIV. INDEX** 297,298
ENG. DIST. HARBOR **T.G.** 794-H5
DISTRICT MAP 033 -B- 217

DEPT. OF PUBLIC WORKS
BUREAU OF ENGINEERING
CITY OF LOS ANGELES
SHEET 1 OF 2 SHEETS

EXHIBIT C

Legend: Vacation boundary as shown



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COUNCIL DIST. 15 **DIV. INDEX** 297,298
ENG. DIST. HARBOR **T.G.** 794-H5
DISTRICT MAP 033B213 & 033B217

DEPT. OF PUBLIC WORKS

BUREAU OF ENGINEERING

CITY OF LOS ANGELES

SHEET 2 OF 2 SHEETS

EXHIBIT C

Legend: Vacation boundary as shown

BOARD OF PUBLIC WORKS
MEMBERS

CYNTHIA M. RUIZ
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MAYOR

DEPARTMENT OF
PUBLIC WORKS

BUREAU OF
ENGINEERING

GARY LEE MOORE, P.E.
CITY ENGINEER

1149 S. BROADWAY ST., SUITE 700
LOS ANGELES, CA 90015

http://eng.lacity.org

Department of Public Works
Bureau of Engineering
Land Development Group
201 North Figueroa Street, Suite 200
Los Angeles, CA 90012
Honorable Bill Rosendahl, Chairman
Public Works Committee

Date: NOV 0 5 2007
Council File No.: 02-1713
Council District: 15
Contact Person: Phillip Martinez
Phone No.: 977- 6954

Transmittal:

Transmitted herewith, is the FEIR (State Clearinghouse # 90011169) dated February 1996 and a City Engineer Report dated NOV 0 5 2007 for Council review and approval of:

VACATION APPROVAL – VAC E1400813 - Council File No. 02-1713 – Grant Street and Southern Pacific Drive Vacation District.

RECOMMENDATIONS:

1. Adopt the findings by the City Engineer on the attached City Engineer report relative to initiating vacation proceedings. The City Council finds that it has imposed all the mitigation measures that are within the control of the City, as described in the Final Environmental Impact Report (State Clearinghouse # 90011169) that is associated with the impacts of the street vacation and that the other mitigation measures that are not within the authority of the City, have been or should be imposed as set forth in the findings of the Alameda Corridor Transportation Authority Governing Board, dated January 4, 1993, a copy of which is attached and incorporated.

   The City Council finds that no new information exists to show that the project or circumstances of the project have been changed to require additional environmental review, as described in State CEQA Guidelines 15162, and therefore the existing environmental documents adequately describe the potential impacts for this street vacation.

2. Adopt the City Engineer report dated NOV 0 5 2007 with the conditions contained therein.

PUBLIC WORKS
NOV 0 9 2007

Recyclable and made from recycled waste.

3. Fiscal Impact Statement:

To date, an estimated $10,000.00 in charges have been expended in the investigation and processing of this proceeding. Since Section 7.46 of the Administrative Code exempts all governmental agencies from payment of fees, the processing of this report will be absorbed by the Bureau of Engineering.

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4. Objection to the Vacation:

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Attachment:

Edmond Yew, Manager
Land Development Group.

EY/DS/pm
LDG

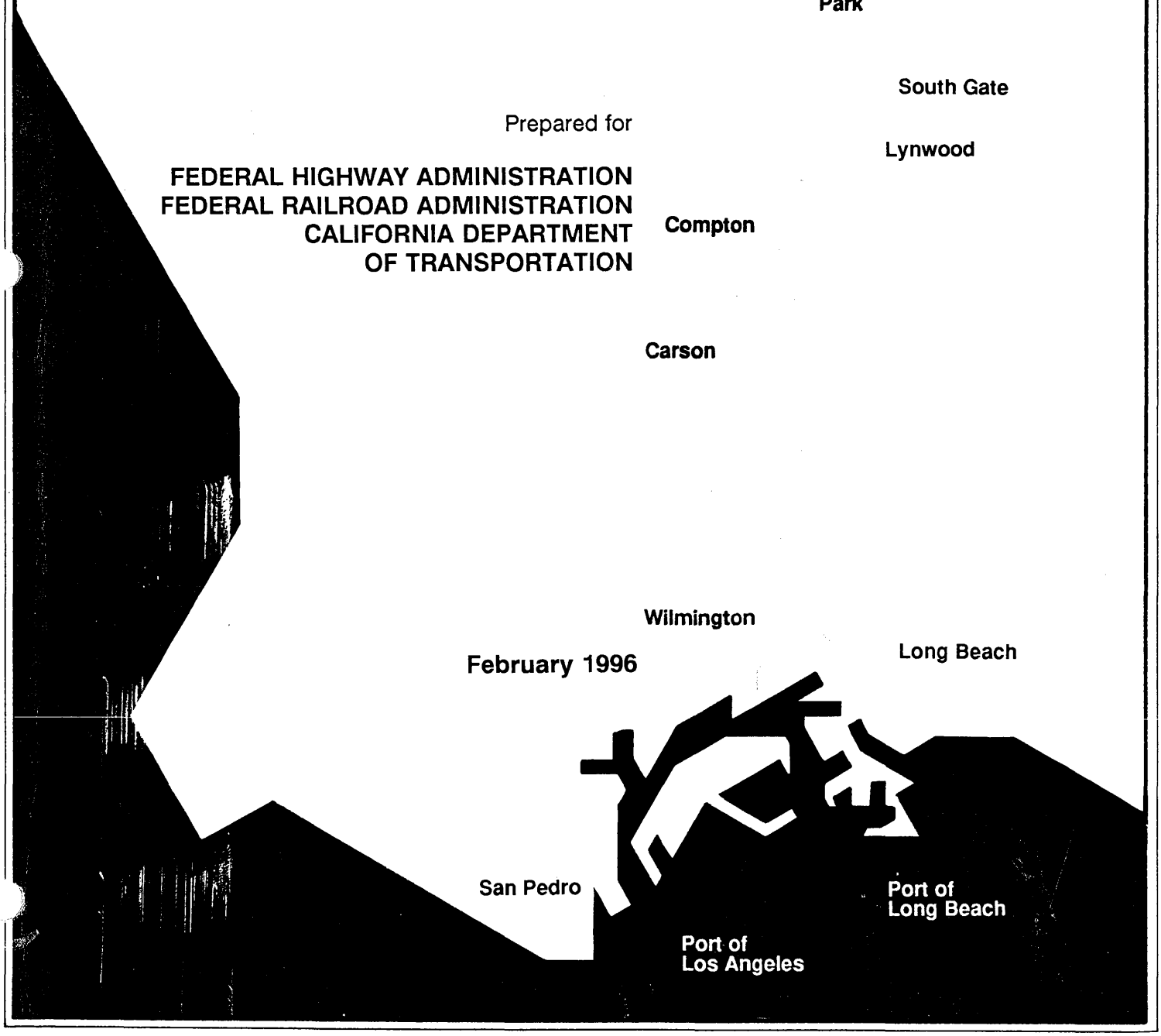
ALAMEDA CORRIDOR

Final Environmental Impact Statement

Prepared for

FEDERAL HIGHWAY ADMINISTRATION
FEDERAL RAILROAD ADMINISTRATION
CALIFORNIA DEPARTMENT
OF TRANSPORTATION

February 1996



Report Number: FHWA-CA-EIS-95-01-F

ALAMEDA CORRIDOR PROJECT
From Downtown Los Angeles to the Badger Avenue Bridge
Los Angeles County, California

FINAL ENVIRONMENTAL IMPACT STATEMENT

Submitted Pursuant to 42 U.S.C. 4332(2) (C) by the

U.S. DEPARTMENT OF TRANSPORTATION
Federal Highway Administration
Federal Railroad Administration
California Department of Transportation

Cooperating Agency
U.S. Department of Transportation, Surface Transportation Board

1/24/96
Date

Jeffrey R. Brooks
Director, Office of Program Development, FHWA, Region IX

1/25/96
Date

Jolene M. Molitoris
FRA Administrator

1/16/96
Date

Ken Steele, District Director, District 7
California Department of Transportation

The following persons may be contacted for additional information concerning this document.

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Chief, District Operations
Federal Highway Administration
980 Ninth Street, Suite 400
Sacramento, CA 95814
(916) 551-1310

Ms. Marilyn W. Klein
Environmental Policies Advisor
Federal Railroad Administration
400 7th Street, SW, Room 8302
Washington, D.C. 20590
(202) 366-0358

Mr. Ronald J. Kosinski
Environmental Branch Chief
Caltrans, District 7
120 So. Spring Street
Los Angeles, CA 90012
(213) 897-0703

Abstract

It is proposed to create a consolidated freight railroad facility within Alameda Street extending from downtown Los Angeles southerly to the Ports of Los Angeles and Long Beach. The completed facility would contain two main line railroad tracks and a maintenance access road within a depressed trainway extending from downtown Los Angeles to the vicinity of State Route 91 (SR 91) and within an at-grade trainway from SR 91 southerly. Accompanying this would be one at-grade railroad drill track located adjacent to the consolidated trainway. Also proposed as part of the project would be the reconstruction of existing Alameda Street, which currently consists of a two-way four-lane roadway west of the proposed trainway and a discontinuous two-way two-lane frontage road east of the proposed trainway. Signalization improvements would be provided throughout the corridor and left turn pockets would be provided at selected locations. In addition to the proposed project, the No Build alternative is examined in this document. The proposed project would have substantial or potentially substantial effects with regard to seismicity, vibration, acquisition and displacement, public services and construction impacts. Beneficial long-term effects are expected with regard to air quality, noise, energy, transportation and circulation, public services, safety and security, aesthetics and economics.

Comments on this Final EIS should be sent to Ronald J. Kosinski, Caltrans District 7, 120 So. Spring Street, Los Angeles, CA 90012. Comments are due by March 11, 1996.

Conversion Factors: Metric Units to English			
Class	**From**	**To**	**Conversion Factor**
Area:	square meters	acres	0.000247
	hectares	acres	2.471
	square meters	square feet	10.76
	square kilometers	square miles	0.3861
Length:	meters	feet	3.281
	centimeters	inches	0.394
	kilometers	miles	0.6214
Volume:	cubic meters	cubic feet	35.34
	liters	gallons	0.2642
Mass:	grams	ounces	0.03527
	kilograms	pounds	2.205
	tonnes (1000 kg)	kips (1000 pounds)	2.205
Density:	kilometers/meter^3	pounds/foot^3	0.06243
Pressure:	pascals	psi	0.000145
Velocity:	meters/second	feet/second	3.281
	meters/second	miles/hour	2.237
	kilometers/hour	miles/hour	0.6214
Temperature:	°C	°F	$t_{.f}=1.8t_{.c}+32$

Conversion Factors: English Units to Metric			
Class	**From**	**To**	**Conversion Factor**
Area:	acre	square meters	4047.0
	acre	hectares	0.4047
	square feet	square meters	0.0929
	square miles	square kilometers	2.590
Length:	feet	meters	0.3048
	inches	centimeters	2.54
	miles	kilometers	1.6093
Volume:	cubic feet	cubic meters	0.0283
	gallons	liters	3.785
Mass:	ounces	grams	28.35
	pounds	kilograms	0.4536
	kips (1000 pounds)	tonnes (1000 kg)	0.4536
Density:	pounds/feet^3	kilograms/meter^3	16.0185
Pressure:	psi	pascals	6894.7
Velocity:	feet/second	meters/second	0.3048
	miles/hour	meters/second	0.4470
	miles/hour	kilometers/hour	1.6093
Temperature:	°F	°C	$T_{.c}=(T_{.f}-32)/1.8$

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SUMMARY

SUMMARY

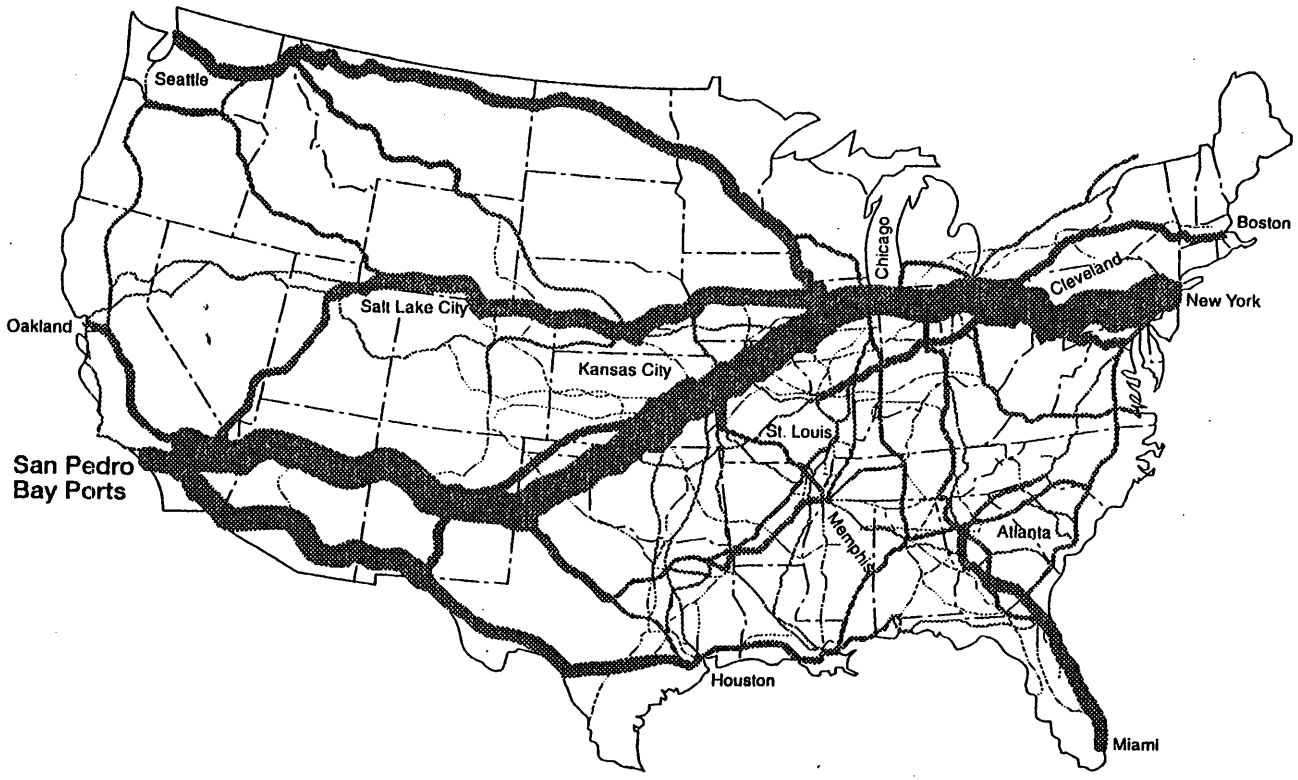
S.1 BACKGROUND

The Alameda Corridor is a consolidated railroad link between the ports of Los Angeles and Long Beach and the regional and national rail systems (see Figure S-1). The Alameda Corridor project is a 32-kilometer (20-mile) corridor, centered along Alameda Street, extending from downtown Los Angeles to the Ports of Los Angeles and Long Beach, within which is proposed consolidation of freight railroad service to the Ports, such service being currently provided by the Southern Pacific (SP), Union Pacific (UP) and Burlington Northern Santa Fe Corporation (BNSF) railroads (see Figure S-2). The Alameda Corridor project has been developing over the past 13 years, beginning with the creation in 1981 of the Ports Advisory Committee by the Southern California Association of Governments (SCAG). Various planning activities undertaken by that committee eventually led to the formation of the Alameda Corridor Task Force in 1985, which in turn led to the creation of a joint powers organization called the Alameda Corridor Transportation Authority (ACTA) in 1989.

The ACTA initiated a conceptual engineering effort in 1990, in order to more fully define the project. At that time, the Federal Highway Administration (FHWA) intended to be the Federal lead agency throughout this process, and it was also intended that a joint Environmental Impact Report/Environmental Impact Statement (EIR/EIS) be prepared for the project. Pursuant to that end, a Federal scoping process was initiated in January, 1991. Subsequent to the initiation of the conceptual engineering effort, it was decided that Federal funding sources which had been identified for use in the project consisted of amounts earmarked for specific grade separation projects along the corridor, such projects being eligible for documentation under Categorical Exclusions under the National Environmental Policy Act (NEPA), rather than an EIS. The ACTA withdrew from the Federal environmental process at this point, and the process moved forward under the California Environmental Quality Act (CEQA) alone.

A range of conceptual engineering alternatives were developed and subjected to environmental analysis, culminating in the issuance of a Draft EIR in August, 1992 and certification of a Final EIR in January, 1993, by the ACTA Governing Board. Connected with the FEIR certification, the ACTA Governing Board also selected a locally preferred alternative, consisting of three primary components: (1) a depressed trainway from downtown Los Angeles southerly to the vicinity of State Route 91 (SR 91), (2) an at-grade trainway from SR 91 southerly to the vicinity of the Ports of Los Angeles and Long Beach, and (3) reconstruction of existing Alameda Street east and west roadways from the I-10 freeway in downtown Los Angeles to the vicinity of SR 91.

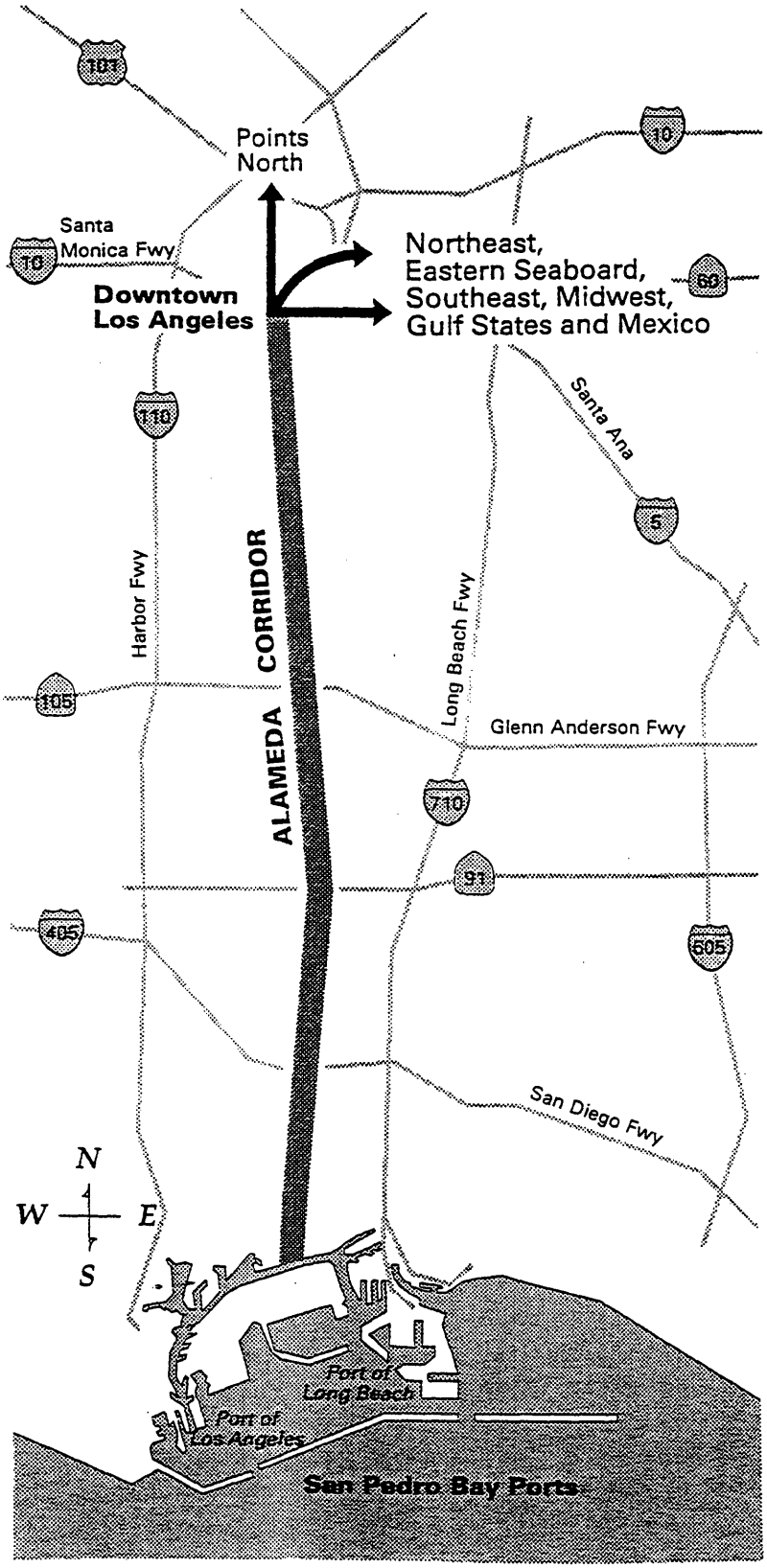
Subsequent to the actions taken locally, it was decided by the ACTA in consultation with Caltrans and FHWA that additional Federal funding for the project should be applied for, and that a Federal environmental document (EIS) should be prepared in support of that activity. The Federal Highway Administration (FHWA) and the Federal Railroad Administration (FRA) agreed to be joint Federal lead agencies for this process, using FHWA NEPA procedures. The purpose of this EIS is to provide such documentation as may be necessary under NEPA. The previously prepared Environmental Impact Report is part of this EIS, and is being considered as part of the NEPA process.



Note: Line thickness corresponds to intermodal volume

Source: Double Stack Container Systems: Implications for U.S. Railroads and Ports (Washington: U.S. Department of Transportation, 1990)

Figure S-1	National Context of the Alameda Corridor	Alameda Corridor EIS



No Scale
Source: National Impact of the Alameda Corridor ACTA, 1994.

Figure S-2	Local Project Area Map	Alameda Corridor EIS

A Draft EIS was issued for public comment on January 27,1995, and the public comment period was officially closed for all parties on March 27, 1995. A summary of the conduct of the public comment period is provided in section S.11 of this Final EIS and a full discussion is provided in section 5.4. This Final EIS has been prepared considering the comments received during the public comment period.

The two Federal lead agencies, FHWA and FRA, upon considering the comments which have been received concerning the DEIS and the proposed project, and upon considering the impacts of the proposed project in relation to the benefits to be derived from its implementation, have concluded that the locally preferred alternative (also known as Alternative 2.1B), is also the Federally preferred alternative. The reasons in support of this conclusion are as follows:

- The proposed project represents the culmination of over a decade of planning activity supporting the concept of a consolidated freight rail corridor in Southern California,
- the proposed project will provide needed improved access to the ports of Los Angeles and Long Beach,
- the proposed project would eliminate an estimated 15,000 vehicle hours of delay at at-grade railroad crossings by the year 2020 that would otherwise occur,
- the proposed project would substantially reduce train-to-train conflicts for trains serving the ports,
- the purpose of the project can be fully achieved by implementation of the preferred alternative,
- the preferred alternative, when viewed in the context of other alternatives under consideration, is judged to be the environmentally superior alternative, because it would result in the least property acquisition, the least adverse noise impact and the least adverse vibration impact, and would produce beneficial effects in terms of air quality and traffic delays,
- the preferred alternative, with the inclusion of agreed upon mitigation, would adequately address concerns which were raised regarding impacts on downtown business areas,
- when compared with Alternative 2.1A, Alternative 2.1B would a) reduce right-of-way requirements to an absolute minimum by confining full property takings to the north and south ends of the corridor where industrial and railroad parcels would principally be involved, and b) the respective interests of the local jurisdictions located along the corridor can be maintained with a minimum of disruption, and
- no other issues were raised during the public comment period which would lead to the selection of another alternative, while at the same time achieving the project purpose.

S.2 PURPOSE AND NEED FOR THE PROJECT

The Alameda Corridor links the ports of Los Angeles and Long Beach with downtown Los Angeles, from where the three railroads serving the region leave to destinations throughout the United States. The original linkage between the ports and the remainder of the United States can be traced to a period of economic development and railroad expansion during the mid-nineteenth century.

The ports of Los Angeles and Long Beach (also referred to collectively as the "San Pedro Bay Ports") constitute the largest seaport complex in the United States and the third largest in the world. A total of 99 million metric tons (109 million tons) of cargo moved through the San Pedro Bay Ports in 1991, representing one-fourth of all U.S. waterborne international trade. The ports are served by three railroads (SP, UP, ATSF) which collectively operated 28 trains each day in 1990 to and from the ports area on 145 kilometers (90 miles) of tracks between the ports and downtown Los Angeles. (In 1993, a total of 32 trains per day operated to and from the ports.) Average speeds on these lines are in the range of 16-32 kilometers per hour (10 to 20 miles per hour), due to a large number of grade crossings and other restrictions.

Based on current cargo forecasts, by the year 2020, the San Pedro Bay Ports are expected to handle 210 million metric tons per year. The composition of goods movement related to the ports is expected to be shifting toward an increased reliance on containers (37 percent of total cargo tonnage in the year 2020), with an attendant increase in the use of railroad service to distribute goods from Southern California to destinations throughout the country. This will be due in large part to the development of on-dock and near-dock railyards that will result in an estimated 23 percent reduction in truck movements by the year 2020. The effects of railyards on rail movements and their associated impacts are included in the analyses presented in this environmental document. By the year 2020, an estimated 97 trains per day will be moving into and out of the ports. Utilization of existing unimproved corridors under this scenario will result in impairment of rail and street traffic flow and increased noise and air pollutant emissions. If railroad service can be consolidated, and if an appropriate corridor can be found, the movement of goods could be enhanced and exposure of people to noise, emissions and traffic delays could be greatly reduced.

The purpose of the Alameda Corridor project is to facilitate access to the ports through the year 2020 to accommodate anticipated ports growth, thereby reducing highway traffic congestion, air pollution, vehicle delays at grade crossings and noise in residential areas. The fundamental purpose of the Alameda Corridor project is to provide a means for improved goods movement by which the adverse consequences of increased freight rail traffic can be reduced, while at the same time sustaining economic growth. With the Alameda Corridor in place, the following benefits are estimated by the year 2020:

- locomotive hours of operation in the region can be reduced by 30 percent,
- railroad emissions can be reduced by 28 percent,
- auto and truck idling emissions associated with delays at grade crossings would be reduced up to 54 percent,
- stoppages involving two trains can be reduced by 75 percent,

- traffic delays affecting cars and trucks at grade crossings can be reduced by 90 percent (15,000 vehicle hours per day),
- delays to emergency vehicles can be substantially reduced.
- right-of-way needed for a consolidated corridor can be reduced to a minimum, resulting in the fewest number of displaced persons and businesses as possible,
- exposure of the population to noise and vibration associated with at-grade train operations can effectively be reduced by 90 percent, without the need for long stretches of continuous soundwalls,
- adverse effects of future train movements on schools, such as noise and safety, can be reduced to a minimum,
- safety and security issues such as the potential for motor carrier and railroad accidents and toxic spills can be effectively managed,
- conflicts between trains and motor vehicles can be substantially reduced,
- approximately 10,000 construction jobs would be created, and
- economic development opportunities along the Corridor would be enhanced by elimination of grade crossings and improved traffic circulation.

In 1990, a conceptual engineering effort was initiated to develop a corridor that could provide the benefits discussed above. A series of project goals were defined, addressing factors such as economics, traffic, railroad operations, environmental considerations, cost, safety and security and construction issues. A range of conceptual alternatives were developed, consisting of primary project alternatives that included an at-grade trainway, a depressed trainway, and alignment variations involving the depressed trainway. Alternative corridors were also considered. The depressed trainway emerged as the locally preferred option, because it would:

- provide for less circuitous traffic patterns,
- require the least amount of right-of-way of all alternatives examined,
- be visually less intrusive than the at-grade alternative,
- result in the least exposure to adverse noise effects,
- reduce railroad related noise without extended lengths of above-ground soundwalls,
- result in the least impact on schools, and
- provide for the best containment of potential toxic spills.

S.3 ALTERNATIVES CONSIDERED

S.3.1 Project Goals

In 1990, following a set of goals that were established for the project, a range of alternatives were developed and evaluated, leading to a set of concept engineering options that were documented in an Environmental Impact Report, pursuant to the California Environmental Quality Act (CEQA). At the outset of the concept engineering effort, a number of goals to guide project development activities were established in the areas of economic development, traffic and circulation, railroad operations, environmental effects, cost effectiveness, safety and security and construction. These goals are reflected in the alternatives evaluation process.

Alternatives that have previously been developed and evaluated include various project configurations along the Alameda Corridor as well as the use of two other corridors, namely the Union Pacific San Pedro Branch and the Los Angeles River. The alternatives that are no longer under consideration and the reasons for their rejection are summarized below, as are the two alternatives that remain under consideration in this EIS, the No Build alternative and Alternative 2.1B, the proposed project.

S.3.2 Alternative Corridors Considered and Rejected

Two alternative corridors previously considered were the Union Pacific San Pedro Branch and the Los Angeles River route. The Union Pacific San Pedro Branch was suggested as a potential alternative corridor because it could potentially provide for rail consolidation at a lower cost. The study corridor is along the Union Pacific Railroad (UPRR) San Pedro Branch line that extends from the East L.A. Yard in the vicinity of Washington Boulevard and Downey Road in the City of Vernon south through or adjacent to the cities of Vernon, Maywood, Huntington Park, Bell, Cudahy, South Gate, Downey, Paramount, Lakewood, Long Beach, Carson and Los Angeles (Wilmington).

The Los Angeles River route would begin at the Downey Road bridge in the north (south of Bandini Boulevard) and extend south to the Union Pacific bridge (south of Del Amo Boulevard). In order to complete the required rail connections at the southern end of the project, the trainway would have to leave the Los Angeles River near Cota crossing and assume an alignment along the southern reach of the UPRR route. To maintain the river's flood control capacity and avoid major construction in the river, only alignments outside the river channel were considered.

In addition, a combination of the Los Angeles River route and the UPRR route was examined. This alternative alignment would begin on the UPRR route at the north end of the corridor, continue south along the UPRR route to a point opposite Tweedy Boulevard at the Los Angeles River, at which point it would assume the river route. The alignment would then proceed south to the Cota crossing, where it would leave the river to assume an alignment along the UPRR route.

The UPRR, Los Angeles River and combination UPRR/Los Angeles River route alternatives were evaluated according to a range of engineering, cost and environmental factors. Among the major reasons for selecting the Alameda Corridor (which is described in detail in Section S.3.6 of this EIS) over these alternatives are that it was shown to have the least residential population

in the vicinity of its alignment and that it has been an industrial corridor for nearly all of its past history. The UPRR and Los Angeles River alternatives were rejected because they both had substantial amounts of residential population in proximity to the routes, and because they were found to have greater adverse consequences than the Alameda Corridor, resulting in considerable negative opinion from the local jurisdictions along those routes.

S.3.3 Alternative Configurations of the Alameda Corridor

Various trainway, roadway and grade separations options were considered for various locations along the corridor. Trainway options included at-grade, depressed and elevated sections; roadway alternatives included two-way and split roadway concepts; and grade separations included options above or below the railroad. Following is a discussion of these various options. Also discussed are combinations of these components that became alternatives for the corridor as a whole.

Trainway Alternatives

Three alternative sections were considered for the trainway: an at-grade section, a depressed (below grade) section and an elevated section. An at-grade trainway configuration would place two mainline train tracks at grade and in proximity to the existing tracks in Alameda Street. A depressed trainway configuration would place the two main line rail tracks in a trench that would be approximately 9 meters (30 feet) in depth below existing Alameda Street. An elevated trainway configuration would place the two mainline rail tracks on an overhead structure or retained embankment along the length of Alameda Street. An at-grade drill track would be provided with each of the trainway sections to continue local service to industrial customers.

Roadway Alternatives

A number of options were developed for the roadway component of the project. These options generally involved either splitting the roadway into a couplet straddling the rail tracks, or placing all of the roadway lanes on one side of the train tracks. In addition, some options retained use of the existing east barrel of Alameda Street, which could then function as a frontage road. The option of depressing the roadway was also considered.

Grade Separation Alternatives

In conjunction with the alternative trainway/roadway configurations along Alameda Street, grade separations to permit effective railroad operations and improve traffic flow were explored for selected east-west streets along the corridor. For at-grade railway alternatives, these grade separations (overcrossings or underpasses, depending upon the constraints or opportunities at any given location) were considered and all other points of at-grade crossing of the tracks would be closed. A number of locations were considered for east-west grade separation, because they are major crossings along the corridor and because they satisfied a minimum delay threshold. In addition to transverse grade separations, a longitudinal roadway with elevated overcrossings along Alameda Street was also suggested. However, because this option would require costly structures and an undulating appearance and ride quality, it was rejected.

Combination of Trainway, Roadway and Grade Separations

The trainway, roadway and grade separation options were applied in various combinations, resulting in a range of alternatives to be evaluated further. In brief, these included: alternatives with an at-grade trainway and six or four lanes of traffic along Alameda Street (Alternatives 1 and 5); a depressed trainway north of SR 91 and at-grade trainway south of SR 91, with six or four lanes of traffic along Alameda Street (Alternatives 2.1 and 6.1); variations to Alternatives 2.1 and 6.1 between 25th and Randolph Streets, where the depressed trainway would follow an alignment along the Southern Pacific Wilmington Branch west of Alameda Street (Alternatives 2.2 and 6.2); and variations to Alternatives 2.1 and 6.1 in the locations of at-grade portions of the trainway and/or street improvement configurations (Alternatives 2.3, 2.4, 3, 6.3 and 6.4).

Evaluation of Alternative Corridor Configurations

The alternative corridor configurations were evaluated in terms of their ability to satisfy the project goals. The evaluation results indicated that the distinctions among alternatives were small. In order to reduce the number of alternatives under consideration, it was determined that other factors should be considered, as follows:

- The alternatives providing only four traffic lanes (Alternatives 5, 6.1, 6.2, 6.3 & 6.4) were eliminated because the traffic analysis showed that these options would carry less traffic than the six-lane options. Also, the EIR would provide an analysis of the traffic consequences of four traffic lanes in the form of the "no build" alternative, and therefore should it be necessary or desirable to consider implementing only four lanes, the effects of that decision would be known. Section 4.7.9 of this EIS presents a discussion of these effects.

- The EIR would adequately identify the impacts of the alternatives which had shorter lengths of depressed trainway (Alternatives 2.3 & 2.4) by documenting the impacts of the complete depressed trainway. The consequences of these options would also be known.

- Alternative 3 would have provided a two-way roadway located completely on one side of the trainway. This alternative was eliminated from further consideration because of its high cost and the fact that it would place a depressed trainway in close proximity to adjacent structures (with inherent potential problems, such as vibration).

- A sensitivity analysis in which cost was eliminated as an evaluation factor was performed on the six-lane options, excluding Alternative 3. This analysis provided reinforcement for the rationale leading to the above conclusions.

Also considered but eliminated early in the evaluation process was an alternative that would have provided exclusive elevated truck lanes along Alameda Street (Alternative 4). This alternative was dropped from further consideration because of its high cost and because projections did not indicate a sufficiently high demand for such a facility. The Governing Board was also concerned about potential noise and traffic impacts.

As a result of the evaluation, and taking into account the findings and conclusions discussed above, the options identified above as rejected were dropped from further consideration, and five

alternatives were assessed in detail in the EIR: No Build, Alternative 1 - At-grade trainway with six lanes along Alameda Street; Alternative 2.1A - Depressed trainway along Alameda Street with six traffic lanes; Alternative 2.1S - Depressed trainway with sloped trench walls along Alameda Street; and Alternative 2.2 - Depressed trainway with the Vernon Diversion.[1]

S.3.4 Alternatives Considered Further

The five corridor alternatives assessed in detail in the Draft EIR received extensive public comment, and a recommended locally preferred project was identified as a result. The locally preferred alternative is referred to as Alternative 2.1B. It consists of the trainway component of Alternative 2.1A, together with a roadway component that would reconstruct four lanes of traffic along Alameda rather than the six lanes proposed under Alternative 2.1A. A detailed description of the locally preferred alternative is provided in Chapter 2 of this EIS.

As a result of completing the environmental documentation under CEQA and having heard comments regarding that documentation from the public, the previously considered alternatives were rejected in favor of the locally preferred alternative and are not being considered within this EIS, for the following reasons:

- The at-grade alternative (Alternative 1.0) was rejected in favor of the depressed alternatives. Because of its larger cross section and elevated grade separations, Alternative 1.0 was found to have more intrusive environmental effects than any of the depressed trainway alternatives, and was therefore judged less desirable. Alternative 1.0 would require more right-of-way width, particularly around the grade separations, resulting in substantially more residential and commercial displacement. Alternative 1.0 would necessitate acquisition of 327 residential units, displacing 1,400 persons, whereas the depressed alternatives would require acquisition of between 13 and 44 residential units, displacing 50 to 200 persons. Alternative 1.0 would necessitate acquisition of 341 non-residential properties, displacing 3,500 employees; whereas the depressed alternatives would require acquisition of 140 to 200 non-residential properties, displacing between 1,200 and 2,600 employees.

  Alternative 1.0 was also rejected in favor of the depressed alternatives because it would subject large numbers of residences (1,400) to increased noise levels requiring mitigation, whereas the depressed alternatives would similarly affect between 500 and 600 residences. Other problems that would be posed by mitigating the effects of noise under Alternative 1.0 result from the need for 18,288 lineal meters (60,000 lineal feet) of sound barriers, which would be perceived as neighborhood barriers and graffiti attractors.

  Alternative 1.0 would also require corridor traffic to use local streets in a larger area to reach above ground grade separations. Intrusion of corridor traffic into the local street system would not occur with the depressed alternatives.

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[1] The Vernon Diversion would route the depressed trainway along the SP Wilmington Branch (along Long Beach Avenue), between 25th Street and Randolph Street. This routing option would eliminate intrusion of the project into the city of Vernon.

Finally, Alternative 1.0 would require the taking of property from several schools along the corridor in order to accommodate the above ground grade separations, whereas this would not be required under the depressed alternatives.

- The sloped-wall depressed trainway option (Alternative 2.1S), while offering potential construction cost savings, was rejected due to enlarged right-of-way requirements and resulting acquisition and displacement that could be reduced with selection of another alternative. Alternative 2.1S would require acquisition of 17 residential units, displacing 70 persons, whereas Alternative 2.1A would require acquisition of 13 units, displacing 50 persons. Alternative 2.1S would require acquisition of 210 non-residential properties, resulting in displacement of 2,600 employees, whereas Alternative 2.1A would require acquisition of 140 non-residential properties, displacing 1,800 employees.

- Alternative 2.2 was rejected in favor of Alternative 2.1A, because Alternative 2.2 would result in a number of adverse effects that also could reasonably be avoided. In particular, Alternative 2.2 would result in the taking of property and exposure of residents to increased noise levels in the Pueblo Del Rio public housing project. Five units, a child care facility, and parking and playground space would be taken from this facility under Alternative 2.2. In addition, Alternative 2.2 would require the taking of 32 additional residential units and 18 additional non-residential properties that would not be required under Alternative 2.1A.

  Moreover, Alternative 2.2 would result in six different intersections exceeding thresholds established for traffic mitigation that would not be affected under Alternative 2.1A.

  Finally, Alternative 2.2 would result in increased noise levels at one school and two recreational facilities that would not occur under Alternative 2.1A.

- Alternative 2.1A was identified as the environmentally superior alternative, but was modified further to become the locally preferred alternative (Alternative 2.1B). Alternative 2.1A emerged from the CEQA process as the environmentally superior alternative, because it adequately met the project goals and because it compared more favorably in terms of the factors discussed above. However, during the course of final deliberations by the ACTA Governing Board, extensive discussions took place regarding right-of-way and traffic considerations in the northern portion of the project. It became clear that with some refinement, the alternative previously thought to be environmentally superior could be improved upon even further, resulting in a consensus among the corridor cities.

  It was suggested that the roadway improvements along Alameda Street should be restricted to reconstruction of the existing number of lanes and further that the current function of the frontage road on the east side of Alameda be retained as at present. In reviewing the traffic analysis that had been conducted for the EIR, it was determined that additional capacity would not be required along Alameda Street to accommodate ports-related goods movement by trucks, and therefore the corridor would function adequately without the additional lanes. These two changes resulted in elimination of all right-of-way takings in the northern portion of the corridor and it satisfied the need to maintain local access to businesses that would have been affected under Alternative 2.1A. Also, an estimated 20 residences previously subjected to adverse noise impacts under

Alternative 2.1A could be avoided. None of these improvements would compromise the project's ability to satisfy overall project goals.

As a result of the discussions and considerations noted above, Alternative 2.1A was rejected in favor of the refinements that were suggested to define the locally preferred alternative, Alternative 2.1B.

To summarize, the two alternatives that are considered in detail in this EIS are 1) the No Build alternative and 2) Alternative 2.1B (a modification of Alternative 2.1A), which emerged from the Concept Engineering/CEQA process as the locally preferred alternative.

S.3.5 No Build Alternative

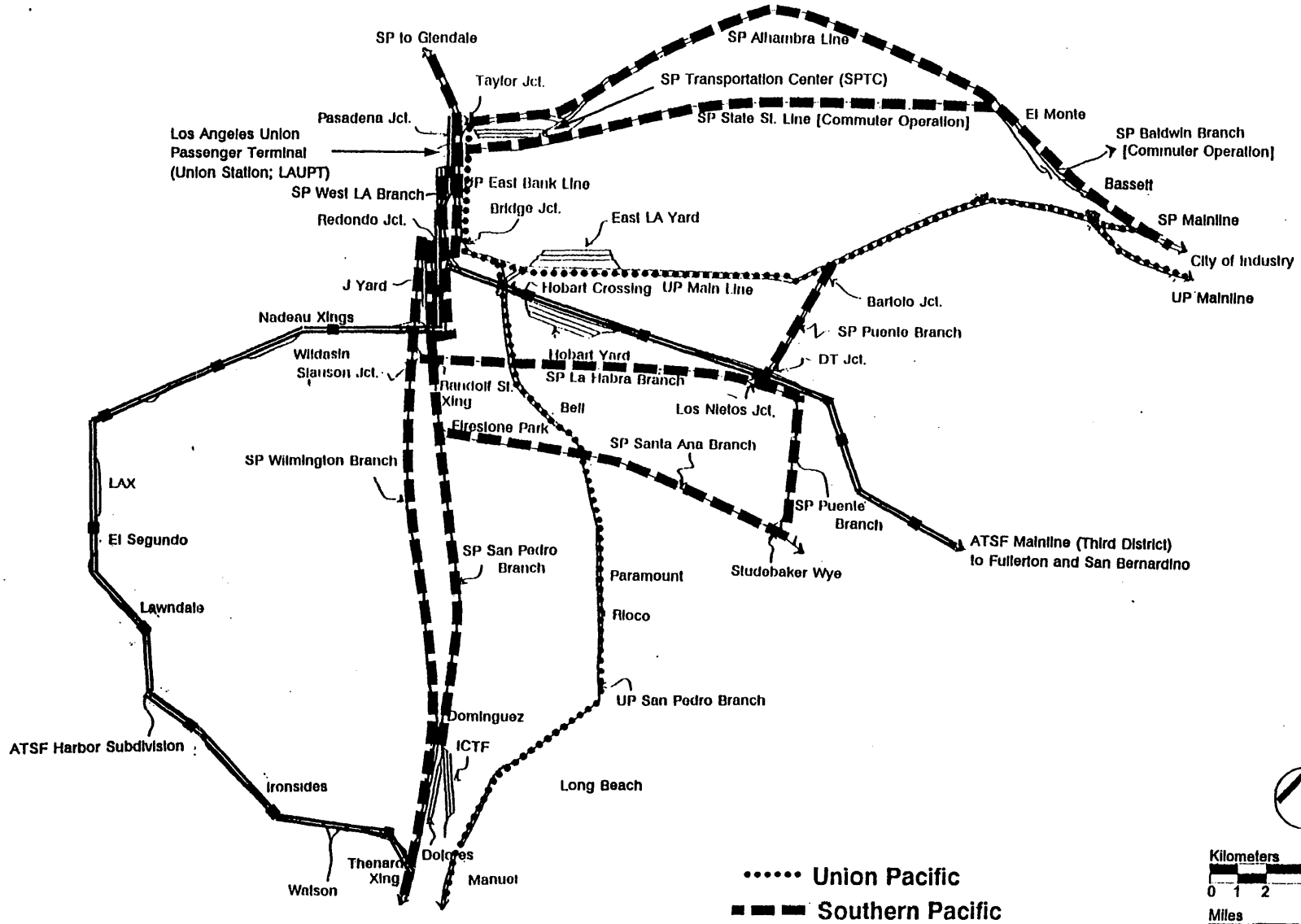
Current Freight Railroad Operations

Currently, freight rail movements of cargo into and out of the ports of Los Angeles and Long Beach are handled on the independent trackage of the three rail carriers operating in the region, namely the Southern Pacific (SP), Union Pacific (UP), and Burlington Northern Santa Fe Corporation (BNSF) railroads. The No Build alternative would continue this mode of operation. This entails a total of 28 through train movements per day on tracks leading to the ports at the present time, and an estimated 97 through trains per day on those same tracks by the year 2020. The routes used by the three carriers are shown in Figure S-3. In order to provide for the orderly movement of trains, it will be necessary for some improvements, such as new signaling, to be made to the existing trackage. The No Build Alternative assumes that these improvements would be undertaken by each of the three carriers. Goods movement by truck is currently handled by the area street and freeway systems, including Alameda Street as it is currently configured. This would be maintained under the No Build alternative. One exception involves a series of projects, referred to as the Ports Access Demonstration Projects, which would make certain improvements to Alameda Street south of State Route 91. These are discussed in Section S.4, Related Projects.

Existing Roadway Improvements

The project area includes Alameda Street, extending from I-10 in the north, south to Henry Ford Avenue, and then south along Henry Ford Avenue to the north side of the Cerritos Channel, at the Badger Avenue Bridge. Alameda Street is classified as a major highway and it extends for a distance of approximately 32 kilometers (20 miles) within the limits of the study area. Henry Ford Avenue is classified as a primary arterial, and it extends for a distance of approximately 1.61 kilometers (one mile) in the study area. There are a total of 151 street intersections within the study area, and 34 at-grade railroad crossings. Of these, 43 intersections are signalized, and 108 are not. Alameda Street passes through a number of municipal jurisdictions, each of which has responsibility for roadway maintenance within the limits of its jurisdiction. The jurisdictions include the City of Los Angeles, the County of Los Angeles and the cities of Vernon, Huntington Park, South Gate, Lynwood, Compton and Carson.

Alameda Street runs parallel to the SP San Pedro Branch. At some locations, vehicular travel lanes are located only on the west side and generally consist of four through lanes with left turn pockets at most intersections. At other locations, Alameda Street has four vehicular through travel lanes on the west side of the railroad right-of-way, together with a two-lane frontage or



Source: DMJM/M&N, 1992; MFA, 1994.

FIGURE S-3	Existing Freight Rail Carrier Routes	Alameda Corridor EIS

local access road on the east side of the railroad. This frontage road exists for a substantial portion of the total length of Alameda Street, but it is not continuous throughout. In the southern portion of the route, the vehicular travel lanes are located on the east side of the railroad.

S.3.6 Proposed Project: Alternative 2.1B (Depressed Trainway with Reconstruction of Existing Alameda Street)

The locally preferred alternative for the Alameda Corridor project, Alternative 2.1B, consists of a depressed trainway providing for two main line consolidated freight rail tracks, together with an adjacent at-grade drill track to provide for deliveries to local industries. Accompanying the depressed trainway would be a reconstructed Alameda Street, generally in its present configuration. Currently, Alameda Street exists as four lanes of two-way flow on the west side of the corridor, and a discontinuous two-lane frontage road on the east side of the corridor. The project would add left turn pockets at designated intersections. Allowing passage across the depressed trainway would be east-west at-grade street overpasses (configured to match existing street geometry on either side of the corridor) at designated streets. The project would also provide intersection signalization improvements.

Alternative 2.1B is illustrated in Figure S-4, and described below. To clarify the various design components that comprise the Alameda Corridor project, the following legend is provided:

Street Overpass of Depressed Trainway

The short roadway bridge constructed over the below grade (depressed) trainway. The bridge will carry vehicles and pedestrians across the trench at the various city streets where a crossing is provided.

Railroad Grade Separation (railroad bridge over trench)

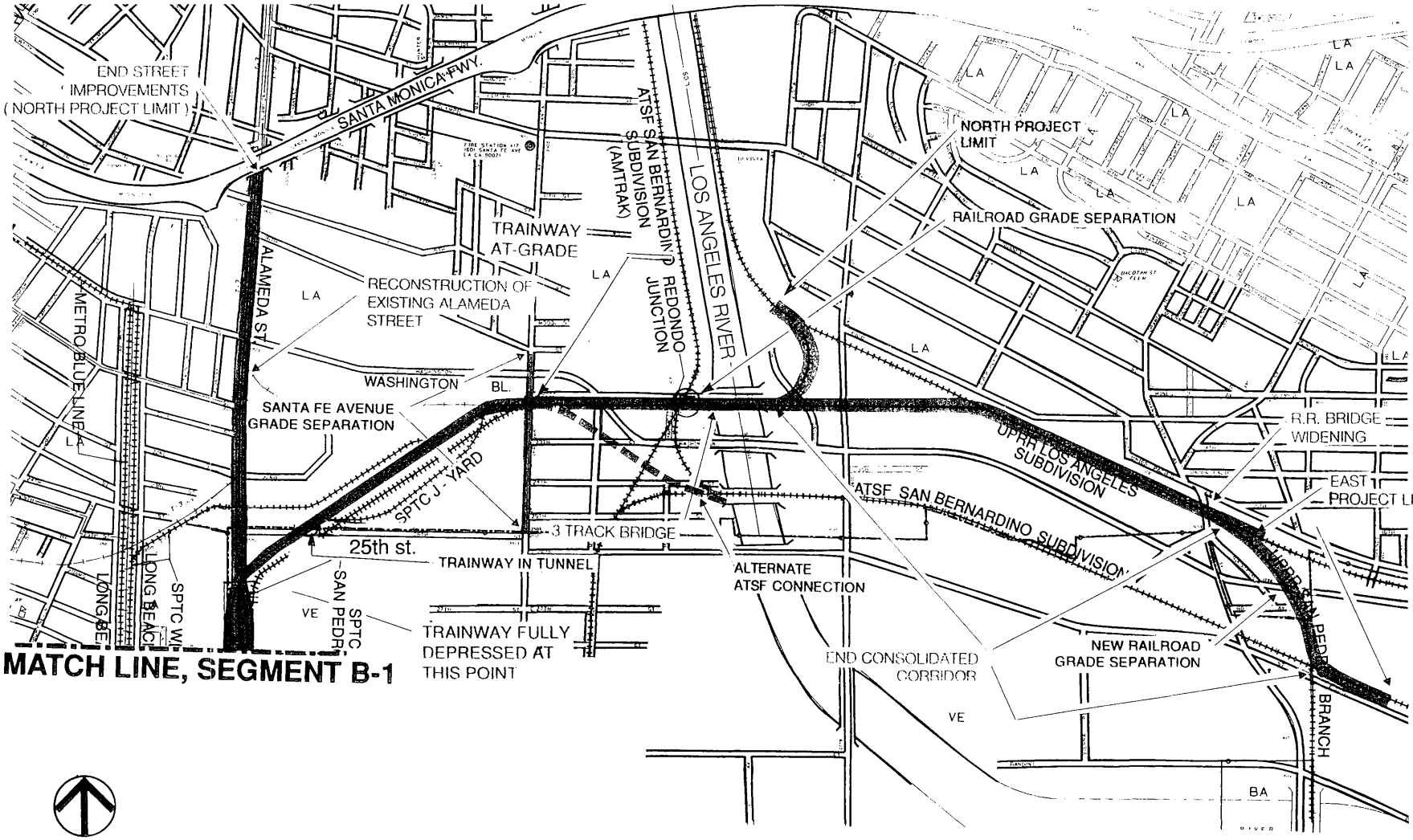
The short railroad bridge constructed over the below grade (depressed) trainway. The bridge may carry a branch line or industry lead railroad track over and past the trench.

Street Grade Separation

A relatively long roadway crossing either over or under the Corridor and other tracks. The structure will carry vehicles and pedestrians past the track areas. In the case of the Pacific Coast Highway (US1) crossing, this shall have the same meaning as the terms "underpass" or "overhead" structure in accordance with Caltrans standards.

Trainway in Tunnel Section

A crossing of the Corridor, where the trench structure is covered (i.e., crossing of a street, where the crossing is too long to be considered a bridge). Either tunnel sections or street overpasses will be constructed, depending on the detailed design.



Sheet 1 of 9

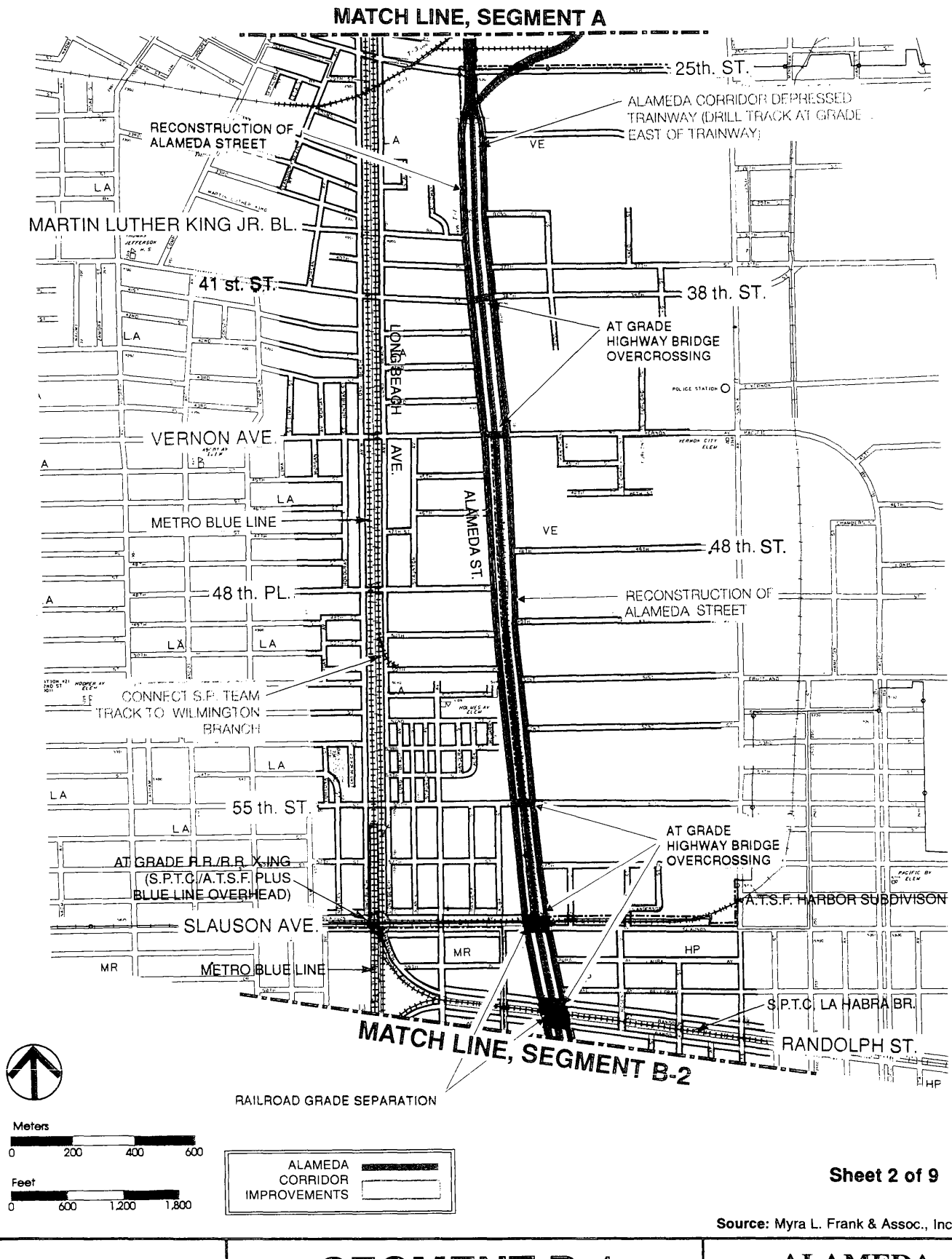
Source: Myra L. Frank & Assoc., Inc., 1994

Figure S-4

SEGMENT A

Alternative 2.1B

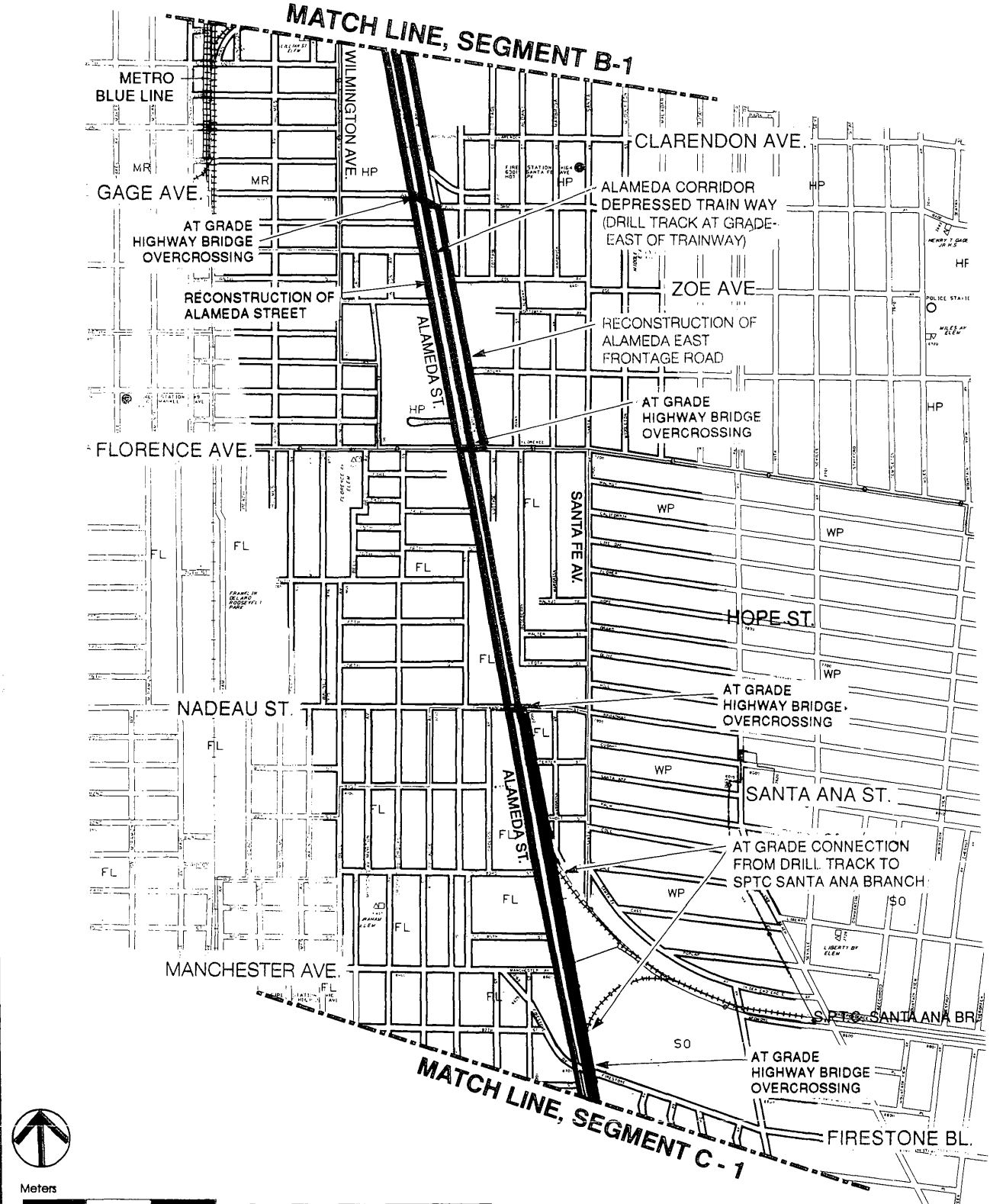
ALAMEDA CORRIDOR E.I.S.



Sheet 2 of 9

Source: Myra L. Frank & Assoc., Inc., 1994

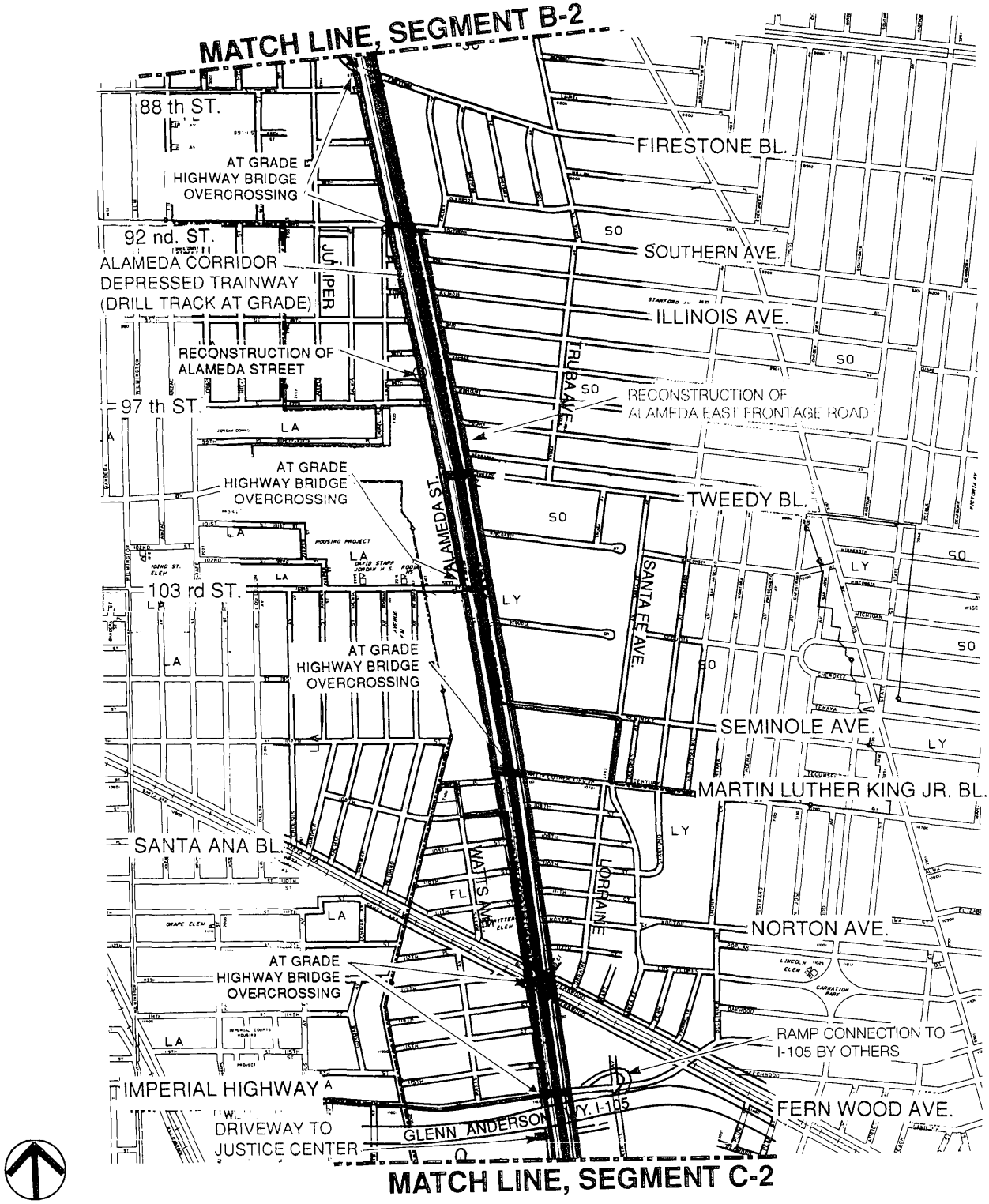
Figure S-4	**SEGMENT B-1** **Alternative 2.1 B**	**ALAMEDA CORRIDOR E.I.S.**



Sheet 3 of 9

Source: Myra L. Frank & Assoc., Inc., 1994

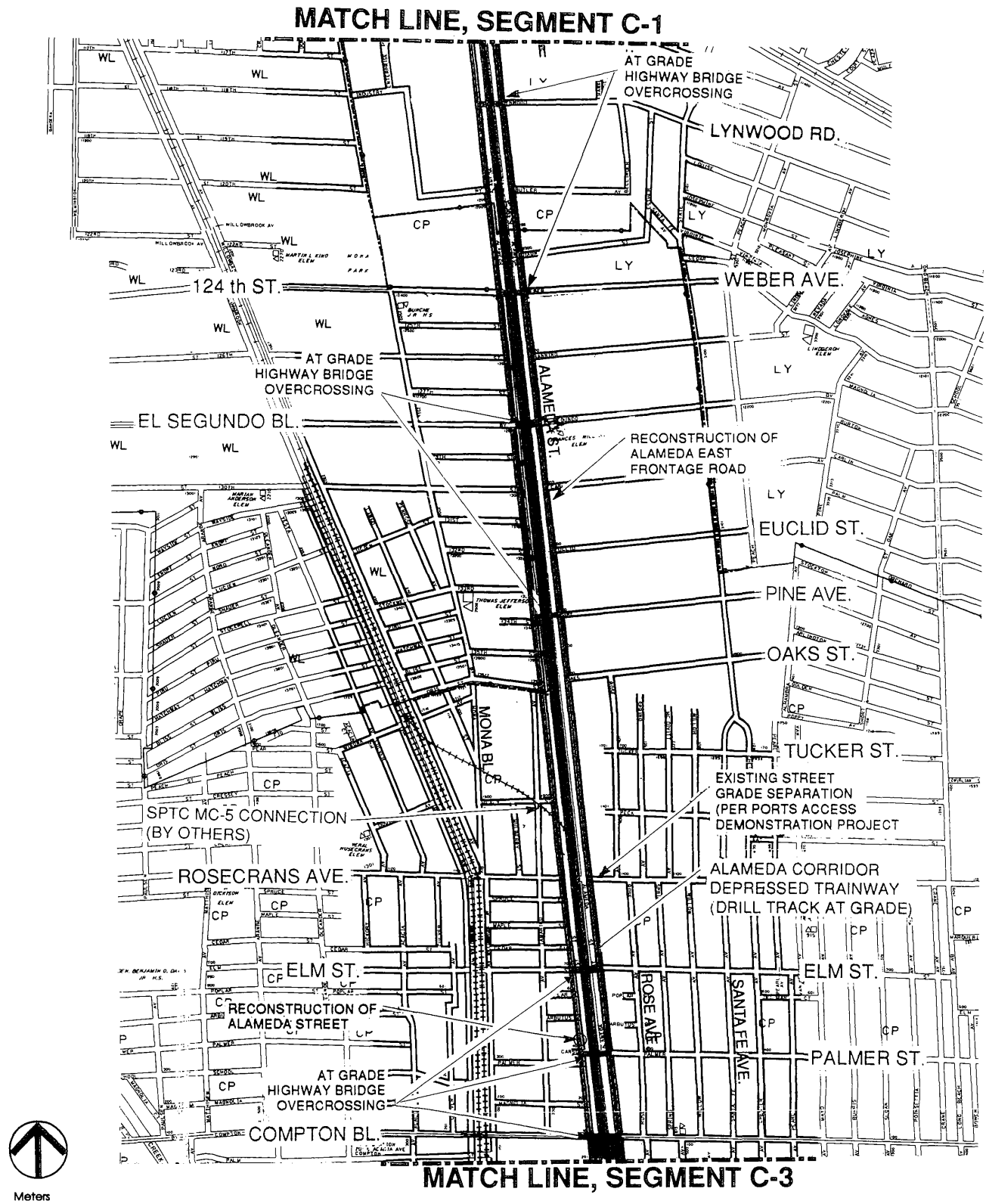
Figure S-4	**SEGMENT B-2** **Alternative 2.1 B**	**ALAMEDA CORRIDOR E.I.S.**



Sheet 4 of 9

Source: Myra L. Frank & Assoc., Inc., 1994

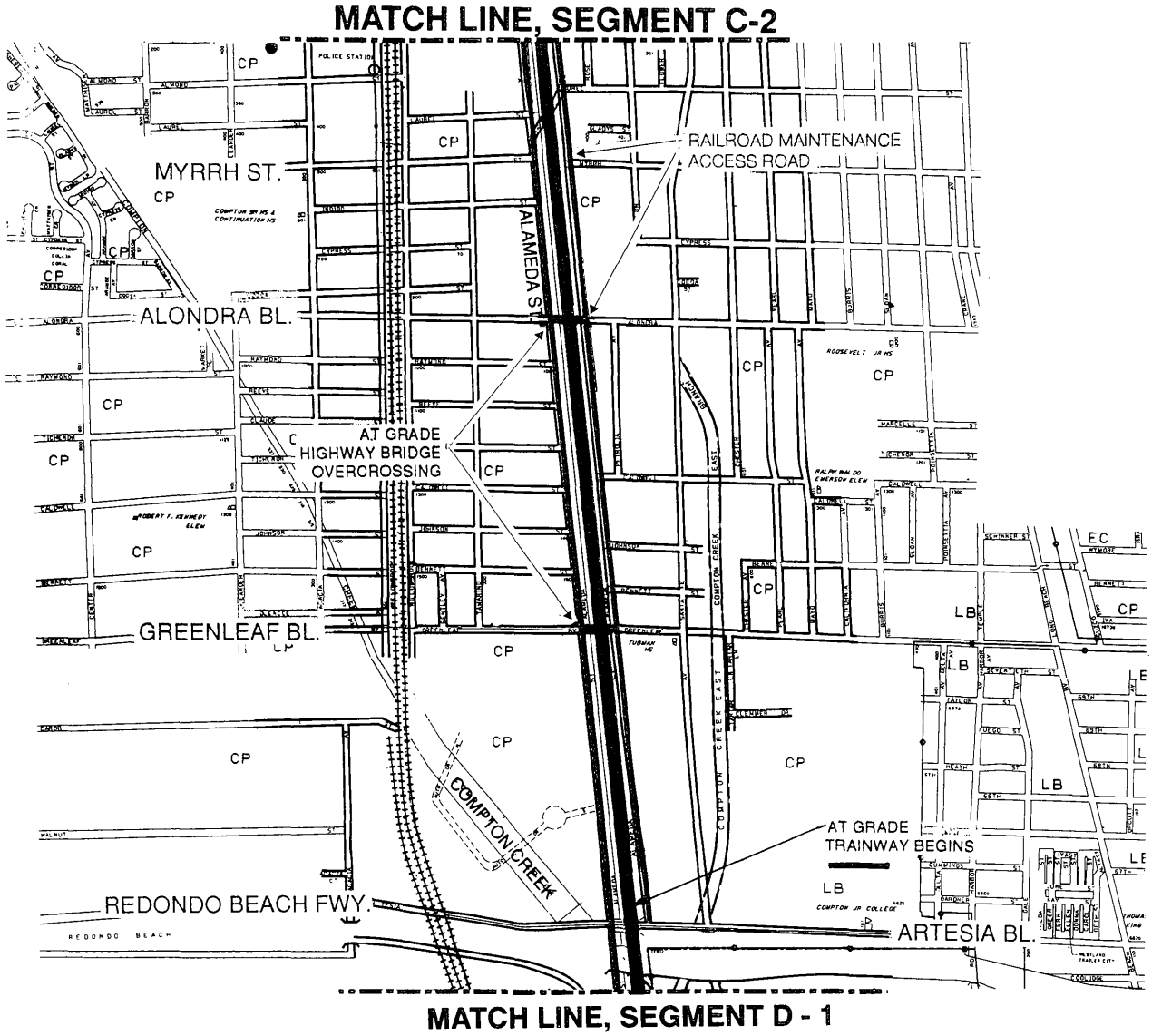
Figure S-4	**SEGMENT C-1** **Alternative 2.1 B**	**ALAMEDA CORRIDOR E.I.S.**



Sheet 5 of 9

Source: Myra L. Frank & Assoc., Inc., 1994

Figure S-4	**SEGMENT C-2** **Alternative 2.1 B**	**ALAMEDA CORRIDOR E.I.S.**



Meters
0 200 400 600

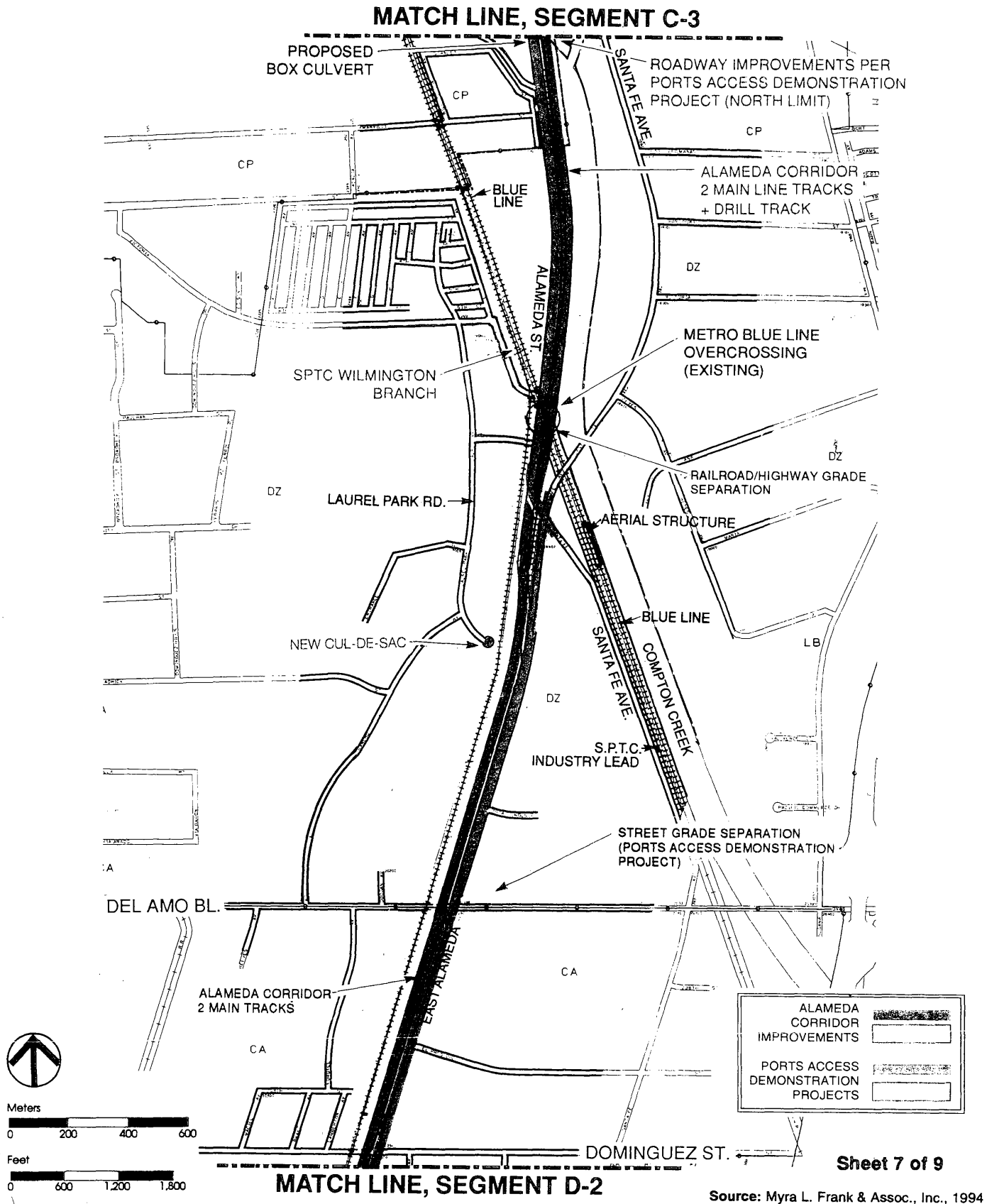
Feet
0 600 1,200 1,800

ALAMEDA CORRIDOR IMPROVEMENTS

Sheet 6 of 9

Source: Myra L. Frank & Assoc., Inc., 1994

Figure S-4	**SEGMENT C-3** **Alternative 2.1 B**	**ALAMEDA CORRIDOR E.I.S.**



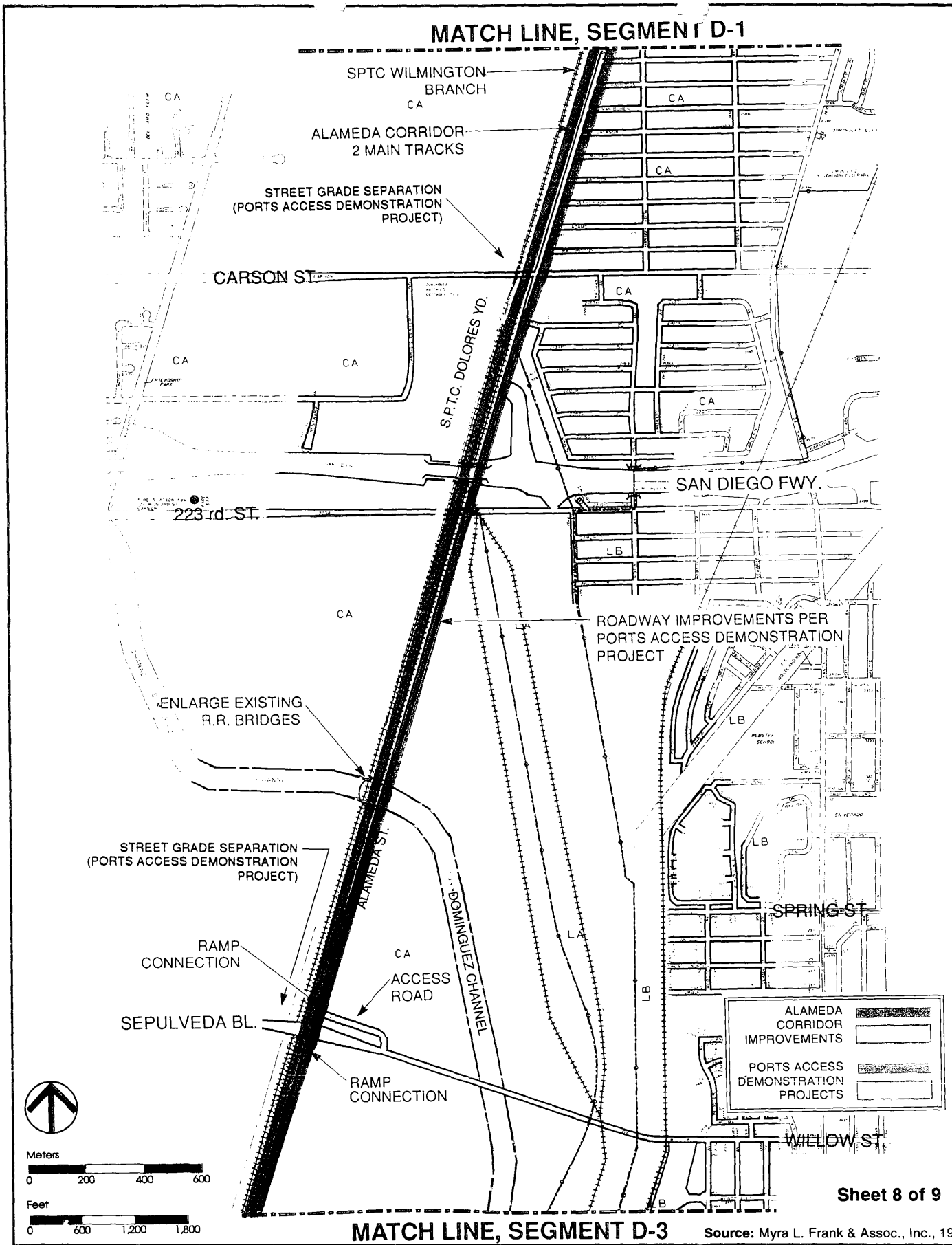
Sheet 7 of 9

Source: Myra L. Frank & Assoc., Inc., 1994

Figure S-4

SEGMENT D-1
Alternative 2.1 B

ALAMEDA CORRIDOR E.I.S.



Sheet 8 of 9

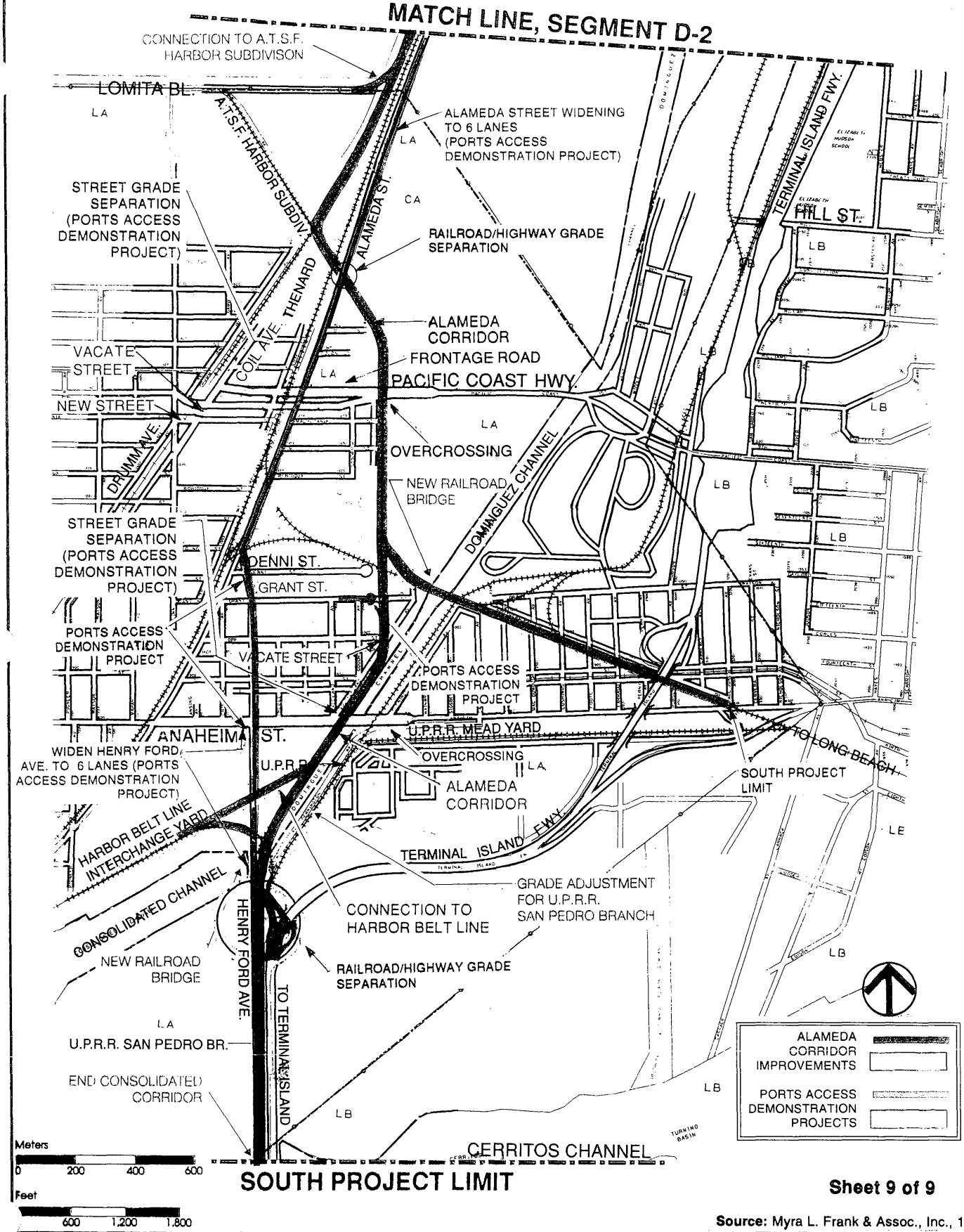
Source: Myra L. Frank & Assoc., Inc., 1994

Figure S-4

SEGMENT D-2

Alternative 2.1 B

ALAMEDA CORRIDOR E.I.S.



Sheet 9 of 9

Source: Myra L. Frank & Assoc., Inc., 1994

Figure S-4	**SEGMENT D-3** **Alternative 2.1 B**	**ALAMEDA CORRIDOR E.I.S.**

Railroad/Highway Grade Separation

A crossing of railroad tracks, usually the Corridor, over a highway or city street. In the case of the Corridor passing over the Terminal Island freeway ramps (SR 47), this shall have the same meaning as an "underpass" structure in accordance with Caltrans standards.

For purposes of impact descriptions in the EIS, the Corridor has been divided into four major segments. The description of the proposed project that follows is organized according to those segments.

Segment A (Pasadena Junction to 25th Street)

Sheet 1 of Figure S-4 illustrates the project configuration in Segment A. The project has two northern limits and one eastern limit. For railroad improvements the northern limit is the 9th Street Junction, north of Washington Boulevard and east of the Los Angeles River. The eastern railroad limit is the Union Pacific's East L.A. Yard, east of Soto Street. The project's northern limit for street improvements is the I-10 freeway.

At 9th Street Junction, a railroad connection to the east bank line would be made to permit trains with destinations to the north and east on SP main lines to move out of the downtown area of Los Angeles. New railroad track would be installed from this point southward along the east bank line, which is located east of and immediately adjacent to the Los Angeles River. From this point the track would make a turn to the west and cross the Los Angeles River on a new three-track bridge.

At Redondo Junction (west of the Los Angeles River and north of Washington Boulevard), a grade separation would be provided between the corridor tracks (located at grade) and the Burlington Northern Santa Fe Corporation (BNSF) main line tracks, which would continue to carry Amtrak service on a new bridge structure. The rail-to-rail grade separation and associated track improvements would extend along ATSF trackage from the vicinity of Olympic Boulevard on the west side of the Los Angeles River, south and east to the Santa Fe Hobart Yard, located east of Soto Street.

From Redondo Junction, the corridor tracks would proceed west, cross over Washington Boulevard (a new underpass at Washington Boulevard would be provided) and would continue west beneath Santa Fe Avenue (a new overcrossing at Santa Fe Avenue would be provided).

Beyond Santa Fe Avenue, the corridor tracks would turn to the southwest into the SP "J" Yard and proceed southwest to the vicinity of 25th Street. At the north end of "J" Yard, the trainway would begin a descent at a one percent grade, reaching its final below grade elevation just beyond 25th Street. 25th Street would be reconstructed as an at-grade street overpass over the depressed trainway along its present alignment.

The corridor also has an east leg in this segment, which is located between the east bank line and the UP East L.A. Yard. This east leg would provide railroad connections between the corridor tracks (crossing easterly over the Los Angeles River) and a) the UP Los Angeles Subdivision, as well as b) the UP San Pedro Branch, enabling Union Pacific trains leaving the corridor to reach the UP San Bernardino Subdivision main line tracks to the east. A new

connection would be provided between the UPRR Los Angeles Subdivision and the ATSF San Bernardino Subdivision along the UPRR San Pedro Branch. This connection would include new one-track railroad bridges over Grande Vista Avenue and Washington Boulevard.

In addition to the reconstruction of existing Alameda Street, roadway improvements in Segment A include overcrossings of Santa Fe Avenue at Washington Boulevard and reconstruction of 25th Street as an at-grade crossing above the depressed trainway.

Segment B (25th Street to Firestone Boulevard)

Beginning at 25th Street, the corridor would be configured as a depressed trainway providing two main line tracks in the center of Alameda Street. Flanking the trainway would be four lanes of two-way traffic along West Alameda and two lanes of two-way traffic along East Alameda. East Alameda would continue to function as a frontage road. Between the trainway and East Alameda would be an at-grade drill track to serve local industries. This configuration would be maintained throughout this segment.

As shown on Sheets 2 and 3 of Figure S-4, east-west at-grade street crossings would be provided over the depressed trainway in this segment at 41st/38th Street, Vernon Avenue, 55th Street, Slauson Avenue, Randolph Street, Gage Avenue, Florence Avenue, Nadeau Street and Firestone Boulevard. At Slauson Avenue, the existing ATSF Harbor Subdivision would cross over the depressed trainway in an east-west direction along a new one track bridge, and at Randolph Street, the existing SP La Habra Branch would cross over the depressed trainway in an east-west direction along the center of Randolph Street on a new one track bridge. A new connection between the existing SP Wilmington Branch and Team Track would be provided just to the north of 55th Street.

Segment C (Firestone Boulevard to State Route 91)

Beginning in the vicinity of Firestone Boulevard, the corridor would be configured as it is in the previous segment. In the vicinity of Greenleaf Boulevard, the depressed trainway would begin an ascent, returning to grade at SR 91. Two railroad maintenance access roads would also be provided in this segment. See sheets 4 through 6 of Figure S-4.

In Segment C, at-grade street overpasses of the depressed trainway would be provided at Southern Avenue, Tweedy Boulevard, 103rd Street, Martin Luther King Jr. Boulevard, Santa Ana Boulevard/Fernwood Avenue, Imperial Highway, Lynwood Road, Weber Avenue, El Segundo Boulevard, Pine Avenue, Elm Street, Palmer Street, Compton Boulevard, Alondra Boulevard and Greenleaf Boulevard. Left turn pockets would be provided from Alameda Street to these cross streets.

Segment D (State Route 91 to Cerritos Channel)

Beginning in the vicinity of SR 91, the corridor would be configured as an at-grade trainway east of the Alameda roadway. This configuration would continue to just south of the Metro Blue Line grade separation, in the vicinity of Santa Fe Avenue, where the vehicular travel lanes would cross beneath the Corridor tracks within the corridor from the west side of the tracks to the east side. Once this transition has been completed, the corridor rail tracks would be located to the west

of the roadway section of Alameda. South of SR 91, Ports Demonstration roadway projects which are not considered part of the Alameda Corridor project begin. Included among these related projects are grade separations at Del Amo Boulevard, Carson Street, Sepulveda Boulevard, Pacific Coast Highway and Anaheim Street. See sheets 7, 8 and 9 of Figure S-4.

A box culvert would need to be constructed just to the south of SR 91 to permit the Compton Creek to pass beneath the corridor.

Existing Laurel Park Road (west of Alameda and north of Del Amo Boulevard) would be converted to a cul-de-sac street. An alternative means of access would be provided by extending Victoria Street to connect with Alameda Street. See sheet 7 of Figure S-4.

At Carson Street, the corridor tracks would deviate slightly to the west to enter the Dolores Yard area, within which the corridor trackage would be located on the westernmost tracks in that yard. Also to be provided would be three 2,439-meter (8,000-foot) long storage/staging tracks, which would be parallel to the corridor tracks. Leaving the Dolores Yard area, the corridor tracks would cross beneath I-405 and 223rd Street/Wardlow Road and curve back to assume an alignment following Alameda Street. The corridor tracks would continue south, crossing the Dominguez Channel on existing bridge structures that would be expanded to accommodate the project.

Just north of Lomita Boulevard, a new railroad connection to the ATSF Harbor Subdivision would be constructed. South of Lomita Boulevard, the tracks would swing wide to the west and then make a curve to the southeast to assume an alignment along the ATSF Harbor Subdivision. The tracks would be at grade with Alameda Street, passing beneath a new grade separation structure.

The corridor would continue in a southeasterly direction along the ATSF alignment, turn to the south and pass beneath Pacific Coast Highway (SR 1), which would be reconstructed as a new grade separation as part of the Ports Access Demonstration Projects.

From Pacific Coast Highway, the corridor would continue south, and at a point opposite Grant Street (which would become a cul-de-sac), the corridor would split, with one portion extending southeast, crossing over the Dominguez Channel on a bridge and extending to approximately Anaheim Street. This would provide a connection with the SP Long Beach Branch, permitting southeast rail movement to and from the Port of Long Beach.

The remainder of corridor tracks would continue due south from the vicinity of Denni Street in a new right-of-way following the alignment of present Leeds Avenue (which would be vacated) to reach the west bank of the Dominguez Channel, at which point the corridor tracks would follow the alignment of the channel. The corridor would continue until Henry Ford Avenue, where it would make a turn to the south to follow that street. North of Henry Ford Avenue, connections would be made from the Corridor to the Harbor Belt Line, to the west. A new interchange would be constructed between Henry Ford Avenue and the Terminal Island Freeway (SR 103/47). The Corridor would continue south until reaching the north side of the Badger Avenue Bridge at the Cerritos Channel, which is the southern project limit and the point at which the corridor improvements would end. Improvements to the Badger Avenue Bridge and rail improvements on Terminal Island are being examined as a separate project by the Port of Los Angeles.

S.4 CURRENT PROJECT STATUS

Subsequent to the actions taken by the ACTA Governing Board in January, 1993, it was determined that federal funding should be pursued for the project. Pursuant to that objective and the National Environmental Policy Act (NEPA), this Environmental Impact Statement has been prepared. The Federal Highway Administration (FHWA) and the Federal Railroad Administration (FRA) are serving as joint lead agencies in that process.

A goal has been established to begin construction by 1996 and have the corridor completely operational by the year 2001.

Funding for the project, which has an estimated total cost of $1.8 billion, would come from a variety of sources. Over one-half (55 percent) of the required funds would come from local sources, including the Ports of Los Angeles and Long Beach, the Los Angeles County Metropolitan Transportation Authority and revenue bonds to be retired by fees charged to users of the corridor. State sources would account for 4 percent of the required funding. Federal contributions would provide the remainder. As of the present, approximately 34 percent of the required funds have been committed.

S.5 RELATED PROJECTS

S.5.1 Ports Infrastructure Plans

The Port of Los Angeles modified its Master Plan (Amendment No. 12) on July 15, 1993, to incorporate the first phase of the Port's plans to accommodate cargo through the year 2020. A Final Environmental Impact Statement/Environmental Impact Report for the Port of Los Angeles' plan to accommodate this projected increased cargo throughput and the relocation of hazardous and other facilities at the Port was completed by the US Army Corps of Engineers (USACOE) and the Port of Los Angeles/Los Angeles Harbor Department in September 1992. The plan includes dredging navigation channels and turning basins in Los Angeles Harbor and the creation of about 235 ha (582 acres) of new landfill to support new terminals and associated handling and storage facilities. The plan provides for four increments of phased construction so that facilities will be developed over time as needed.

The Port of Long Beach is designing and building a comprehensive program of grade separation projects which will dramatically reduce train-related traffic blockages at the Port. This program is expected to be complete by 1997.

The grade separation program complements rail improvements also underway at the Port, including double-tracking the entire length of the harbor lead track to improve capacity and efficiency, and further expansion of the Port's on-dock rail facilities. Altogether, these improvements will speed flow of cargo through the Port and reduce Port-related truck traffic on roadways and freeways.

S.5.2 Ports Access Demonstration Projects

As a result of past efforts, a number of projects to improve access to the ports have been identified and are in various stages of implementation. These projects are assumed to be in

place for purposes of the Alameda Corridor project, and are therefore also part of the No Build Alternative. The Ports Access Demonstration Projects include street widenings, repaving, intersection and interchange improvements, bridge improvements and grade separations along the southern end of the corridor. These projects would complement the improvements proposed as part of the Alameda Corridor project. See Section 2.10.2 (page 2-44) for a detailed discussion of these projects.

S.6 AREAS OF CONTROVERSY/ RESOLUTION OF PREVIOUSLY UNRESOLVED ISSUES

During the course of the conceptual engineering effort and subsequent CEQA documentation, three areas of controversy emerged for the portion of the project north of SR 91, namely: (1) the choice of depressed or at-grade trainway, (2) the choice of primary project alignment along Alameda Street or the Vernon Diversion and (3) the selection of appropriate mitigation measures with regard to emergency services, intersection improvements and soundwalls.

Completion of the CEQA process has resolved all three areas of previous controversy. The depressed trainway was identified as an integral component of the locally preferred alternative. The primary project alignment along Alameda Street has been found preferable to the Vernon Diversion, and therefore the Vernon Diversion is no longer under consideration. Finally, mitigation measures have been defined to address the expected effects identified above. Vehicular access to the depressed trainway for emergency services will be provided at three locations and personnel access will be provided at major street crossings. Existing Alameda Street (east and west roadways) will be reconstructed to its present configuration, with the addition of left turn pockets at appropriate locations and improved signalization throughout the length of the Corridor. Above-grade soundwalls will be required in only a few areas, south of SR 91, and in even fewer locations north of SR 91. This is in sharp contrast to the extensive lengths of soundwalls that would have been needed if the at-grade trainway had been identified as the locally preferred alternative.

As a result of the decisions and actions identified above, all previously identified substantial areas of controversy have been resolved. Unresolved issues that were identified at the outset of the current NEPA process are described as follows:

Identification of the preferred alternative by the Federal lead agencies. The CEQA process led to an identified locally preferred alternative. The NEPA process was initiated by a Notice of Intent, issued jointly by the FHWA and FRA on December 16, 1993. The NEPA process will be completed upon issuance of the Record of Decision. The locally preferred alternative has also been identified by FHWA and FRA as the federally preferred alternative, after considering the comments received during the public comment period, and for the reasons stated in section S.1 of this EIS.

Railroad right-of-way acquisition and operating agreements. Negotiations with the railroads regarding rights-of-way that would be needed for the proposed project have been successfully completed and therefore the project could move forward. Each affected railroad has signed a Memorandum of Understanding precedent to an operating agreement which will govern use of the corridor.

Project phasing. Precisely how the project construction process is to be phased has not as yet been decided. In order for the construction process to be completed with the required degree of efficiency, two objectives will need to be simultaneously satisfied, namely: (1) provide for an orderly construction process that minimizes community impacts and (2) provide for the timely and orderly transition of railroad operations from four independent lines to one consolidated corridor. The details of this phasing will be determined in final design.

Relationship of the Project to ports activity. In response to the Notice of Intent, the City of Vernon submitted a letter of comment, stating that the project exists to mitigate the substantial adverse impacts caused by the growth of the two ports. A response to this issue is provided in Section 5.5 of this EIS.

Mitigation measures. The City of Compton submitted a letter in response to the Notice of Intent which suggested that this city will be the recipient of particular adverse impacts as a result of the project, and further that the city is unique in this regard among all the cities along the Corridor. The analysis presented in this EIS suggests that Compton would receive benefits in excess of the adverse effects that may occur.

Additional comments were received from the City of Compton regarding this matter during the public comment period. The City of Compton requested consideration of a covered truck and trainway through its downtown as a means to reduce the perceived adverse impacts. A detailed study of this matter was undertaken by ACTA staff and a report was prepared, which identified a range of options and evaluated the options based on considerations of cost, schedule, engineering feasibility, impacts and benefits. Three alternative designs were developed and analyzed in order to compare a range of cost and right-of-way considerations. The analysis concluded the following: (1) construction of the tunnel would extend the construction period of the Alameda Corridor project by a minimum of two years; (2) right-of-way requirements would range from 20 to 50 parcels of private property; (3) positive ventilation equipment would be needed in the tunnel, since the tunnel would be regarded as an air quality point source; (4) the tunnel would reduce noise along the alignment but would increase it at the portals; (5) access, fire/life safety and operation and maintenance issues would accrue to the tunnel; (6) only a modest amount of traffic is likely to be attracted to the tunnel; and (7) the cost would range from $90 million to $270 million. This information has been reviewed by the ACTA Governing Board, City of Compton officials, and FHWA and FRA, and as a result, it has been decided that special consideration will be given to the Compton central business district. Included among the components of the proposed mitigation for this area would be: (1) a series of cut-and-cover sections and wider bridges to be built at key intersections; (2) development of pedestrian plazas, with planters, kiosks and other treatments at the wider bridges; (3) graded slopes adjacent to the rail trench will be used to maximize lines of sight across the corridor; (4) construction impact accommodations specific to Compton will be developed; and (5) ACTA and Compton will cooperate with SCAG in the development of a regional truck study. In addition, a master plan for landscaping and urban design will be developed for the entire 20-mile Corridor. This response has been accepted by the City of Compton and therefore this matter is considered to be resolved. A thorough discussion of this topic is provided in a response to comments made by Omar Bradley, Mayor of the City of Compton, which can be found in section 5.5 of this EIS.

S.7 OTHER FEDERAL ACTIONS REQUIRED

In addition to the action which must be taken by FHWA/FRA in the course of completing this environmental process (issuance of a Record of Decision), the following actions must be taken by other federal agencies:

- U.S. Army Corps of Engineers: Issue required permits for five water crossings.

- Interstate Commerce Commission / U.S. Department of Transportation; Surface Transportation Board:[2] Approval of railroad purchase and operating agreements governing use of the Corridor.

Based upon project coordination efforts to date, the USACOE has indicated these proposed stream crossings may be eligible for nationwide section 404 permits, depending upon the design of the crossings and the amount of physical disturbance that would occur. See the USACOE January 13, 1995, letter in Appendix F. The 404 permits will be obtained prior to construction and will be based on further detailed information to be developed during final project design.

S.8 STRUCTURE OF THE EIS

In preparing this Federal EIS, it has been decided that maximum use should be made of the prior work that has been completed for purposes of the CEQA process. As a consequence, this EIS is organized to amplify those subject areas requiring expansion in order to satisfy Federal regulatory requirements that were not addressed in the EIR. Included among the subjects which fall into this category are:

- *air quality* (additional documentation is needed to address certain requirements pertaining to the Clean Air Act, including a conformity determination),

- *cultural resources* (the Federal Section 106 process must be addressed),

- *hydrology and water quality* (requirements of the Corps of Engineers must be addressed),

- *hazardous materials* (additional documentation has been requested by FHWA and EPA), and

- *vegetation and wildlife* (coordination is required with regard to endangered and/or threatened species, pursuant to Federal law.

For those subject areas not having additional Federal regulatory requirements, the documentation provided in the EIR is relied upon. Updates or summary sections have been

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[2] On December 29, 1995, President Clinton signed into law the *Interstate Commerce Commission (ICC) Sunset Act of 1995*, dissolving the ICC. Although the ICC no longer exists, some of its functions have been transferred to the Department of Transportation (DOT). Rail functions have been transferred to the recently created Surface Transportation Board within the DOT.

provided in the EIS (in section 4.7), but the primary analysis is contained in the EIR, which is a part of this EIS and is included as a companion volume to this EIS.

The EIS (in Chapters 3 and 4) provides cross references to EIR chapters and sections to guide the reader to the appropriate place where required information is contained.

This EIS Summary chapter contains, in Table S-1, an overview of the impacts which have been documented for the proposed project, as well as the mitigation measures that are intended for inclusion with the project.

S.9 MAJOR INVESTMENT STUDY

The final statewide and metropolitan planning regulations under the Intermodal Surface Transportation Efficiency Act (ISTEA) became effective November 29, 1993. Section 450.318 of these regulations require that a Major Investment Study (MIS) be undertaken where the need for a major metropolitan transportation investment is identified. Section 450.104 defines a major metropolitan transportation investment as "a high-type highway or transit improvement of substantial cost that is expected to have a significant effect on capacity, traffic flow, level of service, or mode share at the transportation corridor or subarea scale."

The Alameda Corridor project is not a major metropolitan transportation project as defined in the regulations for the following reasons:

- The proposed project involves highway and railroad improvements, but does not include a transit component; and

- The proposed highway improvements include reconstruction of existing Alameda Street generally in its current configuration and with the existing number of lanes, the provision of grade separations between the railroad and cross streets at locations where grade crossings currently exist, and the provision of left turn pockets and improved signalization along Alameda Street. These do not constitute high-type (major) improvements. Although the project would to a limited degree improve the flow of traffic along and across Alameda Street, it would not attract additional traffic to Alameda Street or otherwise substantially affect capacity, traffic flow, level of service or mode share at the transportation corridor or subarea scale.

Because the project does not fit the definition of a major metropolitan transportation investment, it does not require an MIS. The SCAG MIS committee confirmed this opinion at its meeting on January 10, 1995 (see Appendix F).

S.10 ENVIRONMENTAL JUSTICE

On February 11, 1994, President Clinton signed Executive Order 12898, which directs Federal Agencies to identify and address disproportionate adverse human health or environmental effects of their programs and projects on minority and low income populations. The study area which includes the Alameda Corridor contains a substantial portion of minority and low income persons, as discussed in Section 5.2 of the EIR. Land uses along the Corridor are dominated by industrial uses, however. Residences account for a small proportion of all uses along the corridor.

The proposed project, defined by the locally preferred alternative, would not result in the acquisition of residential property, nor would it displace residents. The proposed project would not cause residential growth in the project area, nor would it redistribute population or otherwise have an effect on area demographics. The proposed project would not remove any existing housing or otherwise affect the local housing stock. The proposed project would not displace any neighborhood businesses or community services.

The proposed project would result in additional railroad noise, which would be mitigated by the use of the depressed trainway and sound attenuation walls in some locations. EIR Alternative 2.1A would have required the acquisition of 13 residences and the displacement of an estimated 48 persons, which would be avoided by the locally preferred alternative. EIR Alternative 2.1A would have resulted in over 500 residences being subjected to severe or substantial noise impacts in the year 2020, even after the implementation of mitigation measures. The locally preferred alternative would result in only four residences which would have noise impacts after the implementation of sound attenuation walls. The proposed project would also result in a 90 percent reduction in population exposure to railroad noise on all lines serving the ports.

In response to perceived visual effects in the Compton CBD, and in recognition of the need to apply urban design principles to the Corridor as a whole, the following mitigation measures have been agreed to:

- A master plan for landscaping and urban design will be prepared for the entire 20-mile corridor.

- A series of cut-and-cover sections and wider bridges will be built at key intersections (Compton Boulevard, Myrhh Street, Palmer Street, Greenleaf Boulevard, Alondra Boulevard) over the lowered railway in Compton. These widened bridges will be developed into pedestrian plazas with appropriate amenities.

- Within the City of Compton, graded slopes adjacent to the rail trench will be used to the extent possible to reduce the effective height of the top of the fence, and thereby maximize line of sight across the rail trench.

The proposed project would also have a number of beneficial effects, the benefits of which would accrue to local area residents as well as others located in the study area. Primary among these would be improved traffic circulation and public safety. The complete grade separation of railroad from surface traffic would greatly improve congestion and local traffic flow in the area. The below-grade trainway would also eliminate the potential for auto-train accidents, and it would substantially reduce other hazards associated with freight train activity. The proposed project would improve the aesthetics of the area by removing above-ground freight trains and creating an open vista across Alameda Street. In doing so, the proposed project would remove an existing physical barrier along Alameda Street. Finally, the proposed project would produce beneficial economic conditions, both during the project's construction and operational phases, that would benefit the local area.

For all the reasons discussed above, it is concluded that minority and low income populations along the Corridor are not being disproportionately affected by the proposed project. In addition to the supporting information provided in this EIS, the following sections of the EIR may be referenced for additional details: Noise (Section 5.4), Land Use (Section 5.1), Population and Housing (Section 5.2), Acquisition and Displacement (Section 5.3), Transportation and

Circulation (Section 5.4), Public Services (Section 5.5), Safety and Security (Section 5.6), Aesthetics (Section 5.7) and Economics (Section 5.9).

S.11 COMMENTS AND COORDINATION

The present federal environmental process began with a Notice of Intent, published in the Federal register on December 16, 1993. Scoping notices were placed in the following newspapers: Los Angeles Times, Long Beach Press Telegram, La Opinion (Spanish translation), Compton Bulletin (minority newspaper), Carson Bulletin (minority newspaper), Watts Times (minority newspaper), Lynwood Journal, Inglewood Tribune and Wilmington Beacon. A formal scoping meeting was held on January 19, 1994. The scoping period ended on February 4, 1994. Comments were received during the scoping period from one federal agency (U.S. Environmental Protection Agency), two regional agencies (Metropolitan Water district of Southern California, Los Angeles Unified School District), two local jurisdictions (cities of Compton and Vernon) and nine interested parties (seven businesses, two individuals). Substantial issues that were raised during the scoping period related to alternatives (including a proposed covered trainway through Compton), accessibility, safety, air quality, noise and vibration, traffic and circulation, landscaping and several specific issues.

Coordination was conducted during preparation of the EIS with the U.S. Environmental Protection Agency, the U.S. Department of the Interior Fish and Wildlife Service and the USACOE.

In addition to the EIS scoping process and the subsequent DEIS public comment period, an extensive public outreach effort was conducted during the CEQA process. The DEIR was distributed to an initial mailing list of 120 government agencies and interested parties, and an additional 100 copies were requested. Notices of the availability of the DEIR were published in a number of area newspapers, including the Los Angeles Times, Carson Bulletin, Compton Bulletin, Lynwood Journal and Wilmington Beacon. The Carson Bulletin and Compton Bulletin are minority newspapers. Copies of the DEIR were placed in the following municipal libraries: City of Los Angeles, Carson, Compton, Huntington Park, Lynwood, Vernon and Wilmington.

A total of six formal public hearing sessions were conducted at four different locations, and these sessions were advertised by a number of means. Postcards were mailed to approximately 1,200 residents, agencies and community organizations. A newsletter was widely distributed. Public service announcements were given to radio and television stations, and a press release was issued. Door hangers announcing the hearings were distributed to 18,000 addresses. In addition, 5,000 flyers each were distributed for two hearings that were added to the regional hearing schedule, one at Jefferson High School and one at the Compton City Hall. Spanish translation was made available at all public hearings. It was required only at one hearing session.

In addition to the formal public hearings, a series of community meetings were conducted at several school campuses under the jurisdiction of the Los Angeles Unified School District. The public comment period extended from August 24, 1992 until October 17, 1992, a period of 55 days.

The Draft EIS was issued for public comment on January 27, 1995, and the comment period was officially closed for all parties on March 27, 1995. A public hearing was conducted on March 2, 1995. Copies of the DEIS were distributed by direct mail and notices advertising the availability

of the DEIS and information concerning the public hearing were provided in the *Federal Register* and in a number of local newspapers. Extensive comments were received both in written form and at the public hearing. Section 5.4 of this EIS provides a more detailed overview of the public comment process. Section 5.5 provides the written comments and responses. Section 5.6 provides the public hearing comments and responses.

S.12 SUMMARY OF IMPACTS AND MITIGATION MEASURES

The following table indicates the project's potential environmental impacts for each alternative, the degree of those impacts and mitigation measures.

TABLE S-1
ALAMEDA CORRIDOR SUMMARY OF IMPACTS

CATEGORY	ALTERNATIVE	POTENTIAL ENVIRONMENTAL IMPACTS		MITIGATION	RESIDUAL IMPACT
		DESCRIPTION	DEGREE		
Topography, Geology & Soils					
Hazardous Materials Issues During Construction[1]	Proposed Project	Some construction activities could disturb previously abandoned oil wells, which could release contaminants.	Not Substantial	Undocumented and/or improperly. abandoned wells will be abandoned according to applicable guidelines.	Not Substantial
		Construction along the corridor may encounter sites with contaminated soils and groundwater.	Potentially Substantial	Sites known to be contaminated will be cleaned prior to or during construction. Cleanup activities will be conducted in accordance with applicable regulations.	Not Substantial
Hazardous Materials Issues During Operation	Proposed Project	A train derailment or other incident involving trains carrying hazardous materials could result in the deposition of hazardous materials into the soil. (See also Safety and Security.)	Not Substantial	An Emergency Response Plan will be developed and implemented, including provisions for clean up of hazardous materials released during a train accident.	Not Substantial
Seismicity	Proposed Project	A moderate to major earthquake during the lifetime of the project would subject it to strong groundshaking, which could result in the failure of structures and disrupt service along the corridor.	Potentially Substantial	Careful soil testing will be conducted and compensation for weakness in soil strength will be provided, coupled with state-of-the-art seismic design. The project will be designed in accordance with applicable codes and regulations.	Not Substantial
		Some areas along the corridor, such as between Del Amo and Sepulveda boulevards and in the vicinity of Imperial Highway, may be subject to liquefaction.	Potentially Substantial	All areas of high or perched ground water will be analyzed for liquefaction potential. Site-specific engineering solutions will be implemented.	Not Substantial
Flooding	Proposed Project	Portions of the corridor are located in areas that have the potential for periodic inundation.	Not Substantial	Building codes and other applicable regulations will be adhered to.	Not Substantial

[1] Construction impacts are temporary and are therefore substantial (where indicated as such) only during the construction period.

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CATEGORY	ALTERNATIVE	POTENTIAL ENVIRONMENTAL IMPACTS		MITIGATION	RESIDUAL IMPACT
		DESCRIPTION	DEGREE		
Hydrology and Water Quality					
Construction	Proposed Project	Construction activities would expose soil to erosion and result in surface runoff.	Not Substantial	Standard erosion and drainage control techniques will be used. A General Storm Water Permit will be obtained from the Regional Water Quality Control Board. A General Industrial Storm Water Permit will also be required.	Not Substantial
		Dewatering may be required in some portions of the corridor.	Not Substantial	Areas potentially requiring dewatering will be identified in final design and proper groundwater control measures will be used.	Not Substantial
		The potential for encountering contaminated groundwater exists in various locations along the corridor.	Not Substantial	Contaminated groundwater will be treated prior to discharge into a nearby storm drain. A National Pollutant Discharge Elimination System permit will be obtained from the RWQCB.	Not Substantial
Operation	Proposed Project	A train derailment or other incident involving trains carrying hazardous materials could result in surface water contamination. (See also Safety and Security.)	Not Substantial	An Emergency Response Plan will be developed and implemented, including provisions for remediating contamination of surface waters.	Not Substantial
		The addition of footings and columns for crossings of the Los Angeles River, Compton Creek and Dominguez Channel could affect the flood control capacity of these waters.	Not Substantial	These improvements will be designed to provide for appropriate hydrology considerations in coordination with the USACOE and the Los Angeles County Flood Control District.	Not Substantial
Coastal Zone Management	Proposed Project	The southern end of the project falls within the coastal zone. The project would not have impacts to the coastal zone or be in conflict with coastal zone management policies.	Not Substantial	A permit (or waiver) to construct within the coastal zone will be obtained. The area is under the dual jurisdiction of the City of Los Angeles and the California Coastal Commission.	Not Substantial

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CATEGORY	ALTERNATIVE	POTENTIAL ENVIRONMENTAL IMPACTS		MITIGATION	RESIDUAL IMPACT
		DESCRIPTION	DEGREE		
Air Quality					
Construction	Proposed Project	Emissions of criteria pollutants and fugitive dust would be produced in quantities above significance thresholds established by the SCAQMD. Construction emissions are not considered substantial under NEPA.	Not Substantial (under NEPA)	Equipment and vehicle use restrictions will be imposed on construction contractors, within practical and cost effective limits.	Not Substantial
Regional Criteria Emissions	No Build	Locomotive, auto and truck emissions would increase substantially.	Substantial	None proposed under this alternative.	Substantial
	Proposed Project	Locomotive emissions would be substantially reduced by the proposed project, for all criteria pollutants. Auto and truck emissions would be reduced slightly.	Beneficial	None required.	Beneficial
Local Carbon Monoxide Emissions	No Build	Carbon monoxide concentrations would be higher in future years at sensitive receptor locations. State and federal standards would be exceeded at several locations.	Not Substantial	None proposed under this alternative.	Not Substantial
	Proposed Project	Carbon monoxide concentrations would be the same as or lower than the No Build alternative, depending on receptor location. State and federal standard exceedances would not be exacerbated.	Beneficial at most locations; no effect at remainder of locations.	Minor roadway geometric improvements (e.g., left turn pockets) and signalization improvements will be provided to promote smooth the flow of traffic along the corridor.	Beneficial at most locations; no effect at remainder of locations.
Air Toxics	No Build	Air toxics would be emitted in increased amounts, in proportion to increased use of mobile sources, such as vehicles and locomotives.	Not Substantial	None proposed under this alternative.	Not Substantial
	Proposed Project	The project would result in reductions of regional air toxics.	Beneficial	None required.	Beneficial

TABLE S-1
ALAMEDA CORRIDOR SUMMARY OF IMPACTS

CATEGORY	ALTERNATIVE	POTENTIAL ENVIRONMENTAL IMPACTS		MITIGATION	RESIDUAL IMPACT
		DESCRIPTION	DEGREE		
Noise					
Construction	Proposed Project	Construction activities would produce noise that could be intrusive at some locations.	Potentially Substantial	Construction practices and equipment usage will be managed to reduce intrusion where possible. High-noise activities will be scheduled for daytime periods.	Potentially Substantial
Effects in Year 2020	No Build	From increased train volumes, 69 residences would experience noise impact.	Substantial	None proposed under this alternative.	Substantial
	Proposed Project	Within Alameda Corridor: A noise impact would be experienced at 92 residences and 2 community facilities, as a result of the proposed project.	Substantial	Noise barriers needed to reduce project-related noise exposure to residential areas will be constructed.	Potential noise impact on 8 residences and 2 community facilities
		Along SP Wilmington Branch: The proposed project would reduce residential noise exposure from 6,800 people to 0.	Beneficial	None required.	Beneficial
		Along UP San Pedro Branch: The proposed project would reduce residential noise exposure from 10,800 people to 0.	Beneficial		
		Along ATSF Harbor Subdivision: The proposed project would reduce residential noise exposure from 12,200 people to 0.	Beneficial		

TABLE S-1
ALAMEDA CORRIDOR SUMMARY OF IMPACTS

CATEGORY	ALTERNATIVE	POTENTIAL ENVIRONMENTAL IMPACTS		MITIGATION	RESIDUAL IMPACT
		DESCRIPTION	DEGREE		
Vibration					
Construction	Proposed Project	Construction activities have the potential for producing low levels of vibration.	Not Substantial	Construction activities will be isolated from sensitive receptors as much as possible. Use of non-vibration construction techniques will be made where feasible.	Not Substantial
Operation	Proposed Project	Vibration effects may occur at Alameda/Santa Ana and at Racket Club Villas.	Potentially Substantial	Various design and operational approaches will be employed to reduce vibration potential, including relocation of special trackwork away from sensitive areas, installation of ballast mats and use of movable points frogs where needed.	Not Substantial
Energy					
Construction	Proposed Project	Minor amounts of fossil fuel and electricity would be consumed during the construction process.	Not Substantial	Standard construction practices will be employed to promote efficient fuel use.	Not Substantial
Operation	No Build	Growth in train and vehicular traffic would result in increased fuel consumption over time.	Not Substantial	Federal fuel economy standards will be relied upon to reduce fuel consumption.	Not Substantial
	Proposed Project	Daily operation of the corridor would use minor amounts of energy.	Not Substantial	Energy efficient lighting will be used. Project facilities will incorporate energy efficiency requirements as per California building codes.	Not Substantial
		Locomotive fuel consumption would be reduced, compared to the No Build alternative, due to reduced train-miles traveled on a daily basis. Motor vehicle fuel usage would be decreased slightly as a result of reduced delays at grade crossings.	Beneficial	None required.	Beneficial
Vegetation and Wildlife					
Effects on Plants and Animals	Proposed Project	No species of concern are known to exist in the corridor; therefore no impact is expected.	No Effect	None required.	Not Applicable

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CATEGORY	ALTERNATIVE	POTENTIAL ENVIRONMENTAL IMPACTS		MITIGATION	RESIDUAL IMPACT
		DESCRIPTION	DEGREE		
Land Use					
Land Use Compatibility	No Build	Increased train volumes could result in incompatibility with some adjacent land uses.	Potentially Substantial	None proposed under this alternative.	Potentially Substantial
	Proposed Project	Project actions do not represent a major change to existing uses and would not impede the achievement of local planning goals.	Not Substantial	None required.	Not Substantial
Population and Housing					
Effects on Local Population and Housing	Proposed Project	No residential displacements or other changes in local population or housing.	No Effect	None required.	No Effect
Barriers to Existing Neighborhoods	No Build	Existing barrier created by at-grade railroad would continue.	Not Substantial	None proposed under this alternative.	Potentially Substantial
	Proposed Project	The depressed railroad may be perceived as a physical barrier between neighborhoods through which it travels. However, the provision of at-grade bridge crossings over the depressed trainway at all existing railroad crossings may enhance vehicular access to neighborhoods on either side of the railway. Overall, the proposed project is not expected to substantially increase the division of neighborhoods resulting from the railway.	Not Substantial	None proposed.	Not Substantial
Acquisition and Displacement					
Residential Displacement	Proposed Project	No residential displacement would be required for the proposed project.	No Effect	None required.	No Effect
Commercial Displacement	Proposed Project	The proposed project would require up to 40 full acquisitions and up to 16 partial acquisitions of commercial properties. Some businesses may have substantial difficulty in relocating.	Substantial	Businesses would be given relocation assistance and monetary payments for relocation expenses in accordance with the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970. Some businesses may choose lump sum payment and cease operation.	Not Substantial

TABLE S-1
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CATEGORY	ALTERNATIVE	POTENTIAL ENVIRONMENTAL IMPACTS		MITIGATION	RESIDUAL IMPACT
		DESCRIPTION	DEGREE		
Transportation and Circulation					
Construction	Proposed Project	Traffic disruption would occur at various locations throughout the construction period. Potential effects include temporary inconveniences, delays, detours, reduced on-street parking, and restricted access to homes and businesses. The expected exposure of any one location to these effects could be up to 3 years.	Potentially substantial	A construction management plan will be developed and implemented. Lane closures will be minimized; workable detours and signage will be provided. A public information program will be implemented to disseminate construction information and respond to local concerns.	Potentially Substantial
Overall Traffic Handling Capacity	No Build	Increased train volumes and deteriorated roadway conditions would result in increasing delays, slower speeds and less capacity to handle future demands.	Substantial	None proposed under this alternative.	Substantial
	Proposed Project	Grade separated crossings over the depressed railroad, left turn pockets and improved signalization would improve traffic conditions in the project area.	Beneficial	None required.	Beneficial
Traffic Capacity at Intersections	No Build	3 study intersections at LOS E and F in 2010; 65 intersections at LOS E and F in 2020.	Substantial	None proposed under this alternative.	Substantial
	Proposed Project	Project traffic increments as compared to No Build traffic conditions would exceed the impact criteria at the 25th Street/Santa Fe Avenue and Greenleaf Boulevard/Alameda Street intersections in 2020.	Substantial	At 25th Street and Santa Fe Avenue an additional lane for eastbound right turn traffic will be provided.	Not substantial
				At Greenleaf Boulevard and Alameda Street, a westbound right turn lane will be provided.	Beneficial

TABLE S-1
ALAMEDA CORRIDOR SUMMARY OF IMPACTS

CATEGORY	ALTERNATIVE	POTENTIAL ENVIRONMENTAL IMPACTS		MITIGATION	RESIDUAL IMPACT
		DESCRIPTION	DEGREE		
Public Services					
Construction	Proposed Project	Temporary inconveniences affecting access to community facilities and impaired emergency access response would occur.	Not Substantial	A construction management plan will be developed and implemented. Included in the plan will be provisions appropriate to the protection of school children, school crossing guards (in locations of nearby proximity to the project) and security fencing. Local jurisdiction transportation department criteria will be used to establish the need for crossing guards.	Not Substantial
Effects on All Public Services	Proposed Project	The number of corridor crossings would be maintained and grade separations would be provided for cross streets.	Beneficial	None required.	Beneficial
	No Build	Increased train and vehicular traffic volumes would result in substantial delays for cross-corridor travel and increases in emergency response time.	Substantial	None proposed under this alternative.	Substantial
Effects on Law Enforcement	Proposed Project	Potential difficulty in pursuing persons committing crimes who were escaping into the depressed trainway could occur, as would the potential for stolen property to be dropped into and abandoned in the trainway.	Potentially Substantial	Surveillance of the corridor will be provided at as high a level as practicable.	Potentially Substantial
Effects on Fire Service	Proposed Project	The depressed trainway provides for containment of spilled materials in the event of an incident, but access by fire personnel could be compromised.	Potentially Substantial	Access roads to the trench will be able to accommodate emergency fire equipment. Fire fighting support (e.g. water lines, hydrants) will be provided in the trench.	Not Substantial

TABLE S-1
ALAMEDA CORRIDOR SUMMARY OF IMPACTS

CATEGORY	ALTERNATIVE	POTENTIAL ENVIRONMENTAL IMPACTS		MITIGATION	RESIDUAL IMPACT
		DESCRIPTION	DEGREE		
Effects on Schools	No Build	The safety of school students crossing the corridor would be compromised by increased train and traffic volumes that would coexist at grade level.	Substantial	No mitigation is proposed under this alternative.	Substantial
	Proposed Project	The proposed depressed trainway with grade separated crossings would greatly reduce train conflicts for students walking across Alameda Street.	Beneficial	None required.	Beneficial
		The proposed project would result in increased noise effects at 2 schools located along corridor.	Potentially Substantial	The use of sound insulation for buildings will be explored and implemented where practicable.	Potentially Substantial
Effects on Churches	Proposed Project	The proposed project would result in noise impacts at one church.	Substantial	The use of sound insulation for buildings will be explored and implemented where practicable.	Not Substantial
Safety and Security					
Construction	Proposed Project	Construction activities and traffic detours would produce impaired access; utility lines may rupture; and contaminated soil may be exposed.	Potentially Substantial	Construction and traffic management plans will be developed and implemented. See hazardous materials issues under *Topography, Geology & Soils* above for mitigation measures related to the potential release of hazardous materials.	Not Substantial
Auto/Train Conflicts	No Build	At-grade railroad crossings would remain unchanged. Auto/train conflicts would increase in the future, due to growth in freight train activity. The effects would extend to all rail lines serving the ports.	Substantial	None proposed under this alternative.	Substantial
	Proposed Project	Conflicts would be eliminated along the consolidated corridor, with the exception of the drill track (local service). Train volumes reduced on other rail lines serving the ports.	Beneficial	None required.	Beneficial
Train Derailments and Spills	No Build	Trains on all lines serving the ports would be subject to a potential derailment or other accident.	Potentially Substantial	Federal and state laws and regulations aim to ensure safe rail practices. Railroad operating policies and procedures (e.g., employee training, response to incidents) should be followed. Emergency response by local fire and police.	Potentially Substantial

TABLE S-1
ALAMEDA CORRIDOR SUMMARY OF IMPACTS

CATEGORY	ALTERNATIVE	POTENTIAL ENVIRONMENTAL IMPACTS		MITIGATION	RESIDUAL IMPACT
		DESCRIPTION	DEGREE		
Train Derailments and Spills, cont.	Proposed Project	Although the proposed project would increase the potential for accidents on the corridor by increasing the number of trains, the provision of improved tracks and equipment and cross-street grade separations would decrease the accident potential. The likelihood of injuries or property damage would be substantially reduced due to containment provided by the trench. The potential for accidents on other corridors would decrease with lower usage. (See discussion of soils and water quality for discussion of accidents involving hazardous materials.)	Potentially Substantial	The project will incorporate infrastructure improvements (e.g., complete signalization and centralized traffic control, continuously-welded track) and 24-hour active surveillance. A corridor Emergency Response Plan will be prepared and implemented in accordance with applicable guidelines and regulations, and it will be approved by all appropriate agencies.	Potentially Substantial
Aesthetics					
Construction Effects	Proposed Project	There would be a disorderly appearance of construction sites and materials storage areas.	Not Substantial	Sites will be screened from view in areas of particular sensitivity.	Not Substantial
		Construction activity could cause light and glare impacts to residences located adjacent to the corridor.	Not Substantial	Construction activities will be conducted during daytime hours whenever possible. Construction lighting will be shielded from residential areas.	Not Substantial
Operational Effects	Proposed Project	Minor above-grade new visual project elements (e.g., railroad bridges), consistent with the existing visual environment would be added.	Not Substantial	None required. Soundwalls will be designed to incorporate graffiti-resistant features.	Not Substantial
		Placing the trainway in a depressed trench would reduce the visibility of the railroad in residential areas.	Potentially Beneficial	None required.	Potentially Beneficial

TABLE S-1
ALAMEDA CORRIDOR SUMMARY OF IMPACTS

CATEGORY	ALTERNATIVE	POTENTIAL ENVIRONMENTAL IMPACTS		MITIGATION	RESIDUAL IMPACT
		DESCRIPTION	DEGREE		
Cultural Resources					
Archaeological Resources	Proposed Project	No anticipated effects. The area between 109th and 111th streets is considered sensitive.	Substantial Impacts Not Likely	Monitoring will occur between 109th and 111th streets during construction.	No anticipated effects
Historic Resources	Proposed Project	The Watson Station, determined eligible for the National Register, would be avoided. Findings of No Effect were reached for the following additional resources: Rancho Dominguez Adobe, David Starr Jordan High School, Ritter Elementary School. A Finding of No Adverse Effect was reached for the Redondo Junction Historic District.	No Effect	An appropriate physical separation distance will be maintained from the indicated resources.	No Effect
Economics					
Construction	Proposed Project	Businesses along the corridor would experience reduced vehicular and pedestrian access, traffic detours, noise and other inconveniences. Some businesses could have substantial difficulty in maintaining business during the construction period.	Substantial	Appropriate signs will be used to direct patrons along alternate routes to businesses. Traffic management plans will be implemented to maintain access to local businesses. A business outreach program and project office hot-line will be implemented.	Potentially Substantial
		Approximately 10,000 construction jobs would be created over the construction period. Direct and indirect expenditures in the local economy would total about $1.4 billion.	Beneficial	None Required.	Beneficial
Business Access	Proposed Project	The proposed project would enhance access to businesses located near the corridor.	Beneficial	None required.	Beneficial
Ports-Related Economic Development	Proposed Project	The project would provide an efficient means of successfully realizing the San Pedro Bay ports master plans' goals for growth of ports activity to the year 2020.	Beneficial	None required.	Beneficial

TABLE S-1
ALAMEDA CORRIDOR SUMMARY OF IMPACTS

CATEGORY	ALTERNATIVE	POTENTIAL ENVIRONMENTAL IMPACTS		MITIGATION	RESIDUAL IMPACT
		DESCRIPTION	DEGREE		
Business Relocation	Proposed Project	Some businesses at properties that would be acquired for the project may not be able to relocate and therefore would close.	Potentially Substantial	Businesses subject to relocation would be compensated in accordance with the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970.	Not Substantial
Revenue Losses	Proposed Project	Annual property tax losses resulting from property acquisitions would total about $345,000. Some losses in local sales tax and business license revenues would occur.	Not Substantial	None proposed.	Not Substantial
Corridor Economic Development	Proposed Project	The proposed project would enhance economic development opportunities along the corridor for businesses supporting industrial and transportation functions.	Beneficial	None required.	Beneficial

Source: Myra L. Frank & Associates, Inc., 1994.

CHAPTER 1

PURPOSE AND NEED FOR THE PROJECT

1.0 PURPOSE AND NEED FOR THE PROJECT

1.1 PURPOSE OF THE PROJECT

The purpose of the Alameda Corridor project is to facilitate access to the ports of Los Angeles and Long Beach through the year 2020 to accommodate anticipated ports growth, thereby reducing highway traffic congestion, air pollution, vehicle delays at grade crossings and noise in residential areas. The fundamental purpose of the Alameda Corridor project is to provide a means for improved goods movement while reducing the adverse consequences of increased freight rail traffic, and at the same time sustaining economic activity.

Recent expansion of activities at the ports and ongoing trends have resulted in modal shifts toward rail. Increased rail movements will, on one hand, reduce adverse environmental effects associated with truck usage, but on the other hand also result in adverse environmental implications associated with train movements that would extend to substantial portions of the region. The Alameda Corridor offers an opportunity to develop a regional solution to potentially substantial problems associated with surface goods movements to and from the Ports. With the Alameda Corridor in place, the following benefits are estimated:

- locomotive hours of operation in the region can be reduced by 30 percent,
- railroad emissions can be reduced by 28 percent,
- auto and truck idling emissions can be reduced by up to 54 percent,
- stoppages involving two trains can be reduced by 75 percent,
- traffic delays at grade crossings can be reduced by 90 percent,
- exposure of the population to noise and vibration can be reduced by 90%,
- right-of-way needed for a consolidated corridor can be reduced to a minimum, resulting in the fewest number of displaced persons and businesses as possible,
- noise associated with train operations can be effectively reduced without the need for long stretches of continuous soundwalls,
- adverse effects of future train movements on schools, such as noise and pedestrian safety, can be reduced to a minimum,
- safety and security issues such as the potential for railroad accidents and toxic spills can be effectively managed,
- conflicts between trains and between trains and motor vehicles can be virtually eliminated,

- approximately 10,000 construction jobs would be created, and
- economic development opportunities along the Corridor would be enhanced by elimination of grade crossings and improved traffic circulation.

1.2 HISTORICAL CONTEXT

The Alameda Corridor links the Ports of Los Angeles and Long Beach (also known as the "San Pedro Bay Ports") with downtown Los Angeles, from where the three railroads serving the region leave to destinations throughout the United States. The original linkage between the Ports and the remainder of the United States can be traced to a unique period in the mid-nineteenth century during which expansion of domestic and international trade and important developments in the nation's railroad infrastructure were simultaneously occurring. The following are key events in the history of the Ports and the Alameda Corridor.

1542 Spanish explorer Juan Cabrillo reports sighting San Pedro Bay.

1847 Freight and passenger service is established by the Sepulveda Family between El Pueblo de Los Angeles and San Pedro Bay along a route known as "San Pedro Road" or "Sepulveda's Stage Road."

1849 A land shipping business is established by John Temple and Juan Alexander for transporting goods by cart and oxen between San Pedro and Los Angeles.

1852 The route of present-day Alameda Street is known to exist, perhaps as far south as the harbor. Timms Landing is constructed as one of the first harbor improvements.

1854 Phineas Banning dredges a channel to a new wharf at Wilmington, which soon becomes the center of activity. Banning gains control of and expands Temple & Alexander's freight service to Wilmington.

1865 Banning is elected to the State Senate on a platform to develop railroad service and harbor improvements.

1868 Banning's railroad bill passes; Banning begins construction of the Los Angeles & San Pedro Railroad following present-day Alameda Street.

1869 Banning completes the railroad line from Alameda and Commercial streets in Los Angeles to Banning's wharf.

1871 Congress appropriates funds to create a deep water harbor in San Pedro Bay.

1872 Southern Pacific gains ownership of the Los Angeles & San Pedro Railroad and almost complete control over all shipping in and out of Los Angeles.

1890 Collis Huntington becomes President of Southern Pacific and attempts to stop development of San Pedro Bay harbor improvements in favor of Santa Monica.

1899 U.S. River and Harbor Act passes; construction of the deep-water harbor and breakwater at San Pedro begins.

1906 Dredging of Long Beach harbor begins.

1909 Further improvements to Los Angeles harbor are conducted to accommodate the increase in port traffic expected from the opening of the Panama Canal.

1913 Los Angeles Harbor breakwater completed.

1923 Terminal Island created with dredged material. Additional breakwaters constructed. Additional terminals and berths developed in response to expanding trade.

1967 Optimization efforts begun regarding existing facilities.

1968 to 1990 Master planning activities undertaken to respond to expanding Pacific Rim trade. Ports become busiest in the nation. Various navigation and landside improvements undertaken. Technological advances pursued with regard to dockside cargo handling and international cargo transfer facilities.

1984 Pier 300 completed in Los Angeles.

1991 Pier J extension completed in Port of Long Beach.

1.3 PRESENT NEED

Today, the ports of Los Angeles and Long Beach constitute the largest seaport complex in the United States and the third largest in the world. One-fourth of all U.S. waterborne international trade flows through the two ports. In 1991, the Ports handled:

- 3.8 million container total equivalent units (TEUs; approximately 25 million metric tons [28 million tons] of cargo),
- 5 million metric tons (5.5 million tons) of neo, break bulk cargo and automobiles,
- 58 million metric tons (64 million tons) of liquid bulk, and
- 11 million metric tons (12 million tons) of dry bulk goods.

A total of 99 million metric tons (109 million tons) of cargo moved through the Ports in 1991.

The Ports of Long Beach and Los Angeles contribute substantially to the economic well-being of the Southern California region. As is noted in the recently published *Regional Mobility Element (SCAG, December 1993)*,

> "Goods movement is critically linked to the local economy and has significant impact on mobility, the environment, quality of life and land use. Foreign trade makes up a major part of regional goods movement and has emerged as a major sector in the region's economic base.
>
> The volume of merchandise traded through the Los Angeles Customs District has grown from $6.2 billion in 1972 to $121.8 billion in 1992. Total trade, imports and exports combined, on the region's rail and highway systems has increased by 16 percent per year."

The ports of Long Beach and Los Angeles are currently served by three railroads, the Union Pacific (UP); Southern Pacific (SP); and Burlington Northern Santa Fe Corporation (BNSF) railroads. Each railroad operates along main and local tracks and uses sidings and yards that each has developed since the mid-1900s.

Approximately 28 trains per day serve the ports on all rail lines combined. All lines together comprise nearly 145 kilometers (90 miles) of railroad main line track connecting the ports with downtown Los Angeles. Average speeds on these lines are in the range of 16-32 kilometers per hour (10 to 20 miles per hour), due to a large number of grade crossings and other physical restrictions. The rail lines serving the ports are shown in Figure 1-1. Some of the characteristics associated with rail service to the ports are shown on Table 1-1:

TABLE 1-1
CHARACTERISTICS OF RAIL LINES SERVING THE PORTS

ROUTE	ROUTE KILOMETERS (MILES)	NUMBER OF UNSEPARATED CROSSINGS	NUMBER OF PERSONS LIVING WITHIN 500 FEET	NUMBER OF TRAINS PER DAY (1991)
ATSF	44.6 (27.7)	92	25,700	3
UP	28.3 (17.6)	33	15,800	8
SP WILMINGTON	35.4 (22.0)	39	21,000	8
SP SAN PEDRO	30.7 (19.1)	34	7,900	9
TOTAL	139.0 (86.4)	198	70,400	28

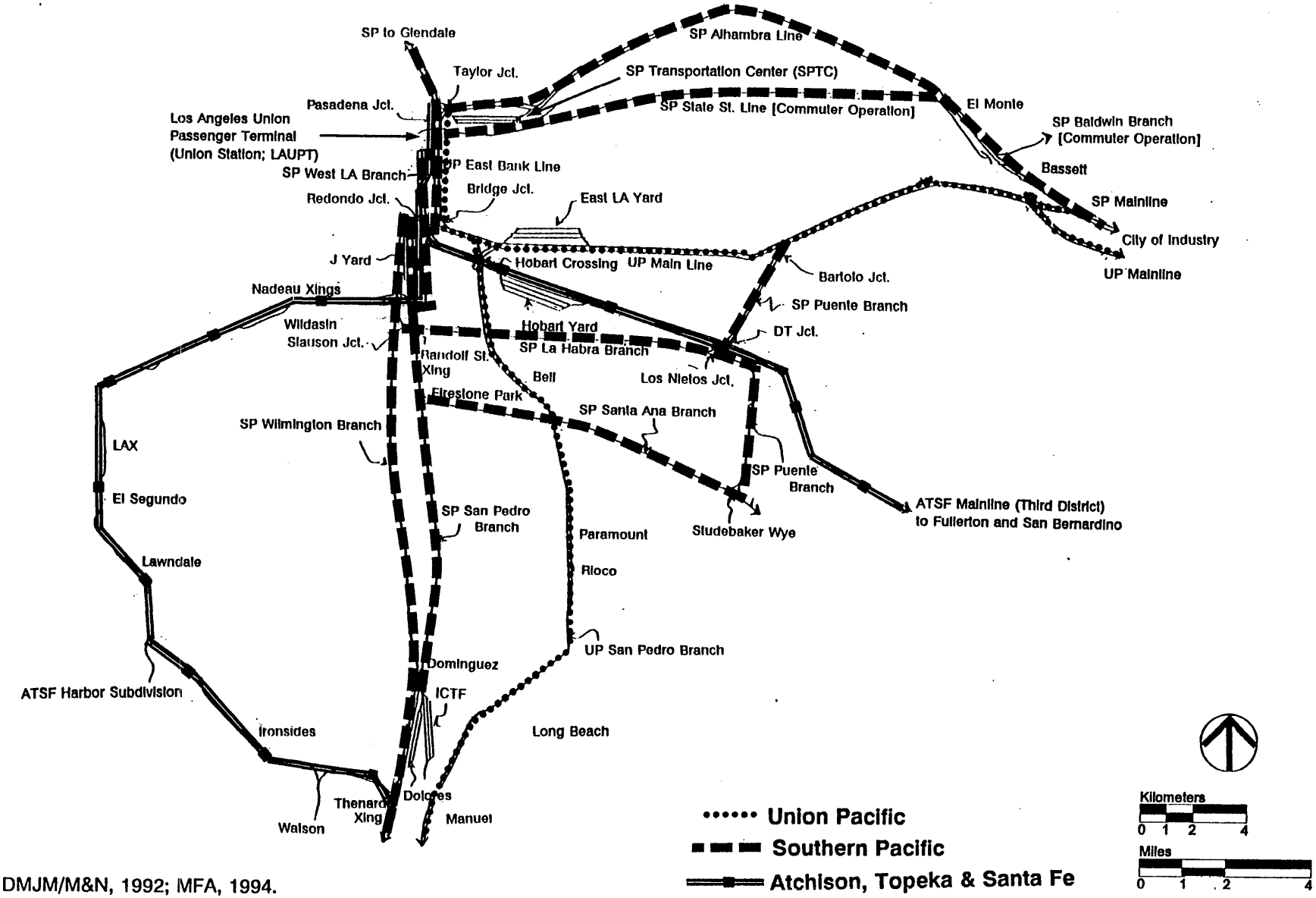
Source: ACTA, 1991.

1.4 FUTURE NEED

The growth in port activity that began in the early 1800s is expected to continue into the foreseeable future, due to the ports' current prominent position in the world market and the expected expansion of that market and Pacific Rim trade in particular. This growth in economic activity has important implications for the transport modes which must be relied upon to move goods to their desired destinations. An appropriate mix of cargo transport modes must be found to effectively manage the impacts of future cargo movements, so that favorable economic conditions can be maintained, but not at the expense of the environment.

Based on current forecasts prepared by the ports of Los Angeles and Long Beach, it is expected that total cargo handling through the San Pedro Bay Ports will expand at an average rate of slightly more than 3 percent per year from the present until the year 2010, and then by about 3.75 percent per year from 2010 until 2020, which is the end of the current forecast period. By the year 2020, the ports are projected to be handling approximately 210 million metric tons per year of cargo (see Table 1-2).

In addition to the expansion of total cargo handling at the ports, the composition of goods moving through the ports is also expected to change as time goes on. In 1991, containers accounted for 25 percent of total tonnage handled at the ports. By the year 2010, containers are expected to account for 33 percent of total tonnage, and by the year 2020, 37 percent of total tonnage. The number of containers handled at the ports is expected to grow by an estimated 208 percent by the year 2020.



Source: DMJM/M&N, 1992; MFA, 1994.

FIGURE 1-1	Existing Freight Rail Carrier Routes	Alameda Corridor EIS

TABLE 1-2
SAN PEDRO BAY PORTS CARGO FORECAST (MILLION METRIC TONS)

CARGO TYPE	1991	2010	2020
CONTAINERS TEUS (MILLIONS)	25 (3.8)	49 (8)	77 (13)
LIQUID BULK	58	62	77
DRY BULK	11	30	46
BREAK/NEO BULK AUTOMOBILES	5	7	10
TOTAL	99	148	210
PERCENT INCREASE OVER 1991 BASE		50	121

Source: ACTA, 1991.

Given the shift in composition of goods movement that is expected at the ports, rail service will assume a larger role in the future than it has in the immediate past. Rail movements are expected to increase over time, from an estimated 28 trains per day in 1991, to 73 in the year 2010 and 97 in the year 2020. *This represents a growth in rail service of 246 percent between 1991 and 2020.*

Unless the Corridor can be implemented, more noise, air pollutant emissions and traffic delays will be spread throughout the region, as a direct result of train operation, and as an indirect result of traffic delays at grade crossings. If railroad service can be consolidated, and if an appropriate corridor can be found, goods movement can be managed much more effectively and the number of people exposed to noise, emissions and traffic delays can be greatly reduced.

Currently, goods are moved to and from the San Pedro Bay Ports to inland destinations by trucks operating on Southern California freeways and local roads and by the three railroads, each operating on its own right-of-way. In 1991, there were approximately 20,000 daily truck movements and 28 daily train movements to and from the ports. Also involved in landside goods movement to and from the ports is the Intermodal Container Transfer Facility (ICTF), located east of Alameda Street between I-405 and Sepulveda Boulevard, which is owned by the ports and operated under a lease to Southern Pacific.

As time goes on, more and more goods will be delivered by ship in containers, and intermodal transfer facilities will become more important. Recognizing this, the ports are pursuing the implementation of on-dock and near-dock rail yards, which would make it possible to transfer containers directly from ship to rail, thus eliminating some of the truck trips that would otherwise be necessary to facilities such as the ICTF and other rail transfer facilities operated by the railroads at their respective downtown Los Angeles yards. The principal effects of on-dock transfer would be:

- An increased reliance on railroad service out of the ports, and
- a projected 63,000 daily truck movements in the year 2020 would be reduced by 23 percent to 49,000 daily truck movements by on-dock rail operations.

It is clear that landside goods movement from the Ports will be increasing and it is equally clear that freight rail service will be relied upon to an ever increasing degree as time goes on. The expected growth in rail movements implies environmental consequences that will also be changing from what they are today.

Under the No Build Alternative:

- Locomotive emissions would increase substantially. Carbon monoxide emissions would increase from 136 kilograms per day (kg/day) [300 pounds per day (lbs/day)] in 1990 to over 3,855 kg/day (8,500 lbs/day) in 2020. Nitrogen oxides would increase from 2,268 kg/day (5,000 lbs/day) in 1990 to 48,980 kg/day (108,000 lbs/day) in 2020.

- Noise exposure would increase substantially throughout the region. Noise levels in the year 2020 would exceed federally-established abatement criteria for a total of 30,200 estimated persons, taking all rail lines into account, as compared with 10,600 affected persons in 1990. For the Southern Pacific, 5,900 affected persons in 1990 would increase to 7,200 in 2020. For the Union Pacific, 3,000 affected persons in 1990 would increase to 10,800 in 2020. For the Santa Fe, 1,700 affected persons in 1990 would increase to 12,200 in 2020.

- An estimated 70 trains per day in 2010 and 100 trains per day in 2020, are projected. Increased train volumes and deteriorating roadway conditions would result in increasing delays, slower speeds, increased idling emissions from autos and trucks and less capacity to handle future demands. Auto/train conflicts would increase dramatically. An estimated 15,000 vehicle hours of delay would be expected daily, occurring on 200 at-grade railroad crossings.

- The potential for train derailments and associated safety hazards would be increased, although the likelihood of harmful incidents would not be great. Increased train and vehicular traffic would result in substantial delays for police, fire and other emergency vehicles.

- Energy consumption would increase from use of locomotives in the region. In 1990, an estimated 1,287 train-kilometers (800 train-miles) of travel each day would increase to 4,184 train-kilometers (2,600 train-miles) in 2020. This would result in an attendant increase of diesel fuel consumed from 24,224 liters per day (6,400 gallons per day) in 1990 to 77,214 liters per day (20,400 gallons per day) in 2020.

- Increased train movements on rail corridors throughout the region would intensify existing incompatibilities with adjacent land uses.

1.5 LOCAL AND REGIONAL PLANNING

The Alameda Corridor project has been recognized as a vehicle for improving goods movement and pursuing improved air quality at the regional level. Freight rail consolidation was recognized as a concept to improve air quality in the *1989 South Coast Air Basin Air Quality Management Plan* (AQMP; SCAQMD & SCAG, 1989), and it was further developed as a Transportation Control Measure (TCM 11) in the 1991 AQMP. It continues to be pursued in the 1994 AQMP.

Regional transportation planning efforts have also embodied the consolidation concept, including the Alameda Corridor itself, in past versions of the *Regional Transportation Plan* (RTP; SCAG, 1989, 1991). The current *Draft Regional Mobility Element* (SCAG, December, 1993) incorporates the project as a key component of its Goods Movement Program. The document states:

> "Few improvements to the region can have as great a beneficial impact as enhancement of goods movement. Betterment of the goods movement system helps raise the standard of living for a significant portion of the region's work force. Key improvements are the following:
>
> Completion of the Alameda Corridor is essential to the region's fight to stay competitive in the world market. Three quarters of a million jobs and the loss of port business to seaports in Ensenada, Mexico and Tacoma, Washington are tied to the successful funding and approval of the Alameda Project."

By 1981, it had become clear to planning officials in Southern California that consideration of needed railroad improvements should be undertaken in order to efficiently manage goods movement in the region, and SCAG created the *Ports Advisory Committee* (PAC) to begin that process. The PAC, which had broad representation (e.g. Ports of L.A. & Long Beach, U.S. Navy, U.S. Army Corps of Engineers (USACOE), Caltrans, SP, UP & ATSF railroads, Los Angeles County Transportation Commission) developed several railroad routing alternatives, including a "consolidation" approach that would channel all trains along the Southern Pacific San Pedro Branch (within Alameda Street). It also developed a list of recommended first phase actions, involving grade separations and other improvements, which have become known as the Ports Access Demonstration Projects.

By 1984, SCAG evaluated the alternative routing concepts, found the consolidation concept to be worthy of further efforts and in 1985, established the *Alameda Corridor Task Force* to carry on the work. The Task Force expanded the former PAC membership to include the California Public Utilities Commission and each of the cities along the corridor, and continued to develop the consolidation concept. In 1988, the Ports of Los Angeles and Long Beach jointly undertook a study (Consolidated Rail Corridor Strategic Plan, November, 1988) which confirmed the advantages of the consolidation concept and the development of on-dock and near-dock yards.

In 1989, the *Alameda Corridor Transportation Authority* (ACTA) was formed and continues to operate at the present time. The ACTA was established as a joint powers agency with a Governing Board consisting of 16 members representing the cities of Los Angeles and Long Beach, the Los Angeles County Metropolitan Transportation Authority, the Los Angeles County Board of Supervisors, the Ports of Los Angeles and Long Beach, Caltrans, the six cities along the corridor (Vernon, Huntington Park, South Gate, Lynwood, Compton, Carson) and SCAG. In 1990, the ACTA began concept engineering studies of the Alameda Corridor project.

The concept of freight rail consolidation is also being pursued on a regional basis beyond the Alameda Corridor. SCAG initiated the "L.A. - Summit Regional Rail Consolidation Project" in the Spring of 1992 to develop and analyze consolidation scenarios from downtown Los Angeles to San Bernardino. This study, which is due to be completed in the Spring of 1995, is focusing on the use of the ATSF main line or a partial or complete consolidation using the SP and UP main lines. Final recommendations regarding alignment alternative, grade separations, cost and schedule are forthcoming at the conclusion of this study.

CHAPTER 2

ALTERNATIVES CONSIDERED

2.0 ALTERNATIVES CONSIDERED

In 1990, following a set of goals that were established for the project, a range of alternatives was developed and evaluated, leading to a set of concept engineering options that were documented in an Environmental Impact Report, pursuant to the California Environmental Quality Act (CEQA).

Alternatives that have previously been developed and evaluated include various project configurations along the Alameda Corridor as well as the use of two other corridors, namely the Union Pacific San Pedro Branch and the Los Angeles River. This section summarizes those alternatives that are no longer under consideration and the reasons for their rejection. (The two alternatives that remain under consideration in this EIS, the No Build alternative and Alternative 2.1B, the proposed project, are described below in Sections 2.4.5 and 2.6)

2.1 PROJECT GOALS

At the outset of the concept engineering effort, a number of goals were established to guide project development activities, described as follows:

Economics	o	promote economic development along the corridor
	o	minimize land devoted to port-related freight rail operations
	o	sustain economic growth
	o	maintain and improving existing businesses
	o	promote growth of international trade through the ports
	o	minimize property acquisitions
Traffic	o	reduce vehicle delays at grade crossings
	o	improve north/south travel speeds
	o	improve level-of-service at intersections
	o	improve connections to I-105 and I-10
	o	provide an alternative route to parallel freeways
	o	improve emergency vehicle access
	o	divert truck traffic to rail
	o	coordinate and interfacing with plans at corridor ends
	o	maximize convenience to pedestrians crossing Alameda Street
Railroad Operations	o	improve railroad operating flexibility and efficiency
	o	improve railroad speeds
	o	provide fair and equal access for all carriers
	o	maintain service to customers
Environmental	o	improve the overall quality of life
	o	minimize projected air pollution
	o	minimize projected energy consumption
	o	develop a project compatible with adjacent land uses
	o	resolve present poor or deteriorating situations
	o	promote improved aesthetics
	o	minimize exposure to noise and vibration
Cost	o	maximize cost effectiveness
	o	maximize coordination of the corridor project with existing projects and funding sources

Safety and Security	o	improve vehicular safety
	o	improve safety for pedestrians
	o	improve safety for operations and personnel
	o	improve security
Construction	o	minimize disruption to highway and rail users
	o	maintain access to existing businesses and residences
	o	minimize noise and other construction impacts
	o	implement the project in phases

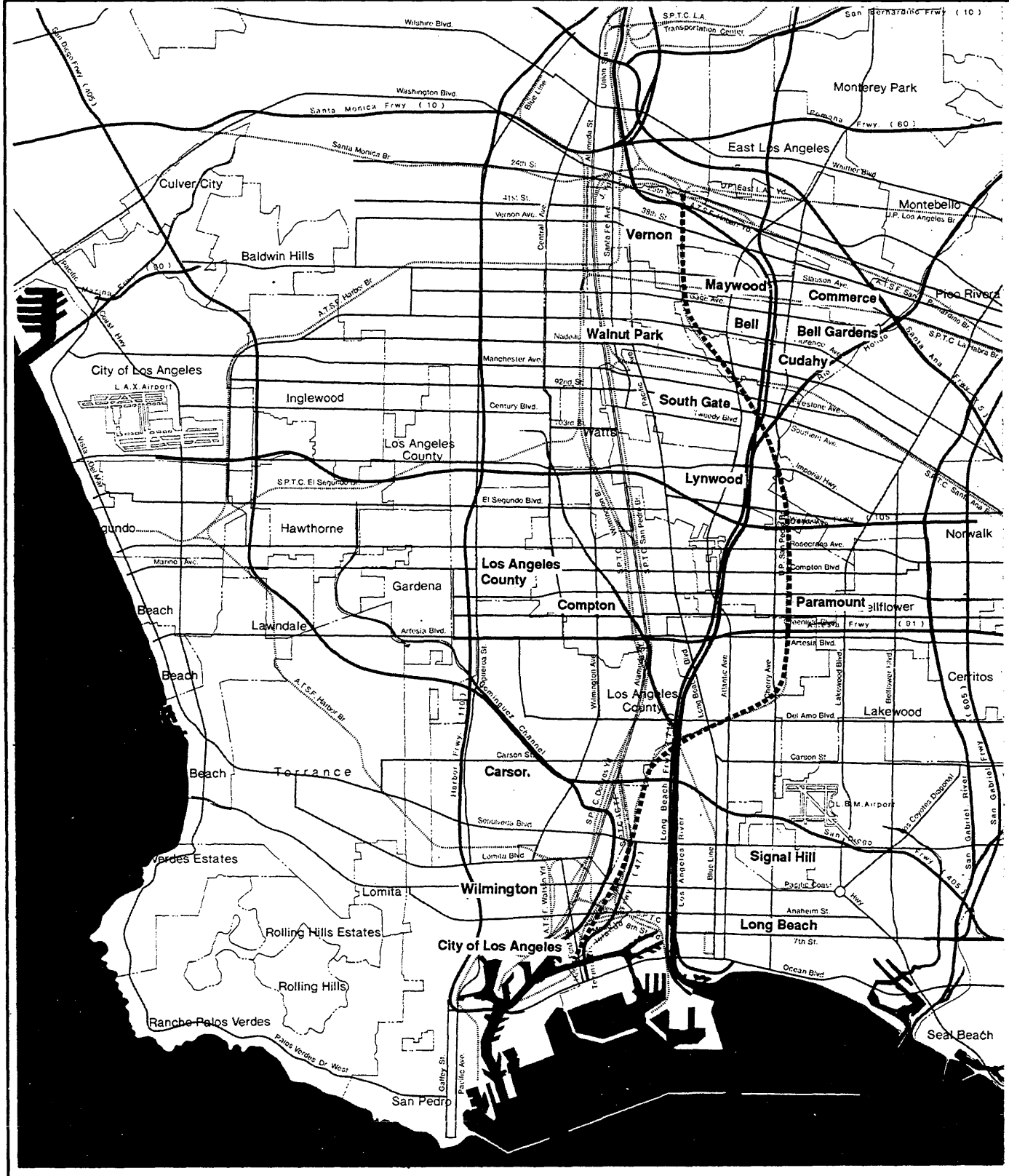
2.2 ALTERNATIVE CORRIDORS CONSIDERED AND REJECTED

In addition to the Alameda Corridor, two additional alternative corridors were also considered, namely along the Union Pacific San Pedro Branch (UPRR) and the Los Angeles River. (See the *Feasibility Study of the Union Pacific San Pedro Branch and Los Angeles River Route as Alternative Consolidated Corridors*, DMJM/M&N, December 1991, for details.) The UPRR San Pedro Branch study corridor was along the UPRR line extending from the East L.A. Yard south to Wilmington, a distance of approximately 32 kilometers (20 miles). The river corridor began at the Downey Road bridge in the north and extended southward to south of Del Amo Boulevard. The length of the corridor was approximately 24 kilometers (15 miles). South of this point, the trainway left the Los Angeles River and assumed an alignment along the southern reach of the UPRR route. A hybrid corridor was also evaluated that would have combined portions of the UPRR and L.A. River alignments.

2.2.1 Union Pacific San Pedro Branch

The Union Pacific San Pedro Branch was suggested as a potential alternative corridor because it could potentially provide consolidation at a lower cost. The study corridor is along the Union Pacific Railroad (UPRR) San Pedro Branch that extends from the East L.A. Yard in the vicinity of Washington Boulevard and Downey Road in the City of Los Angeles, south through or adjacent to the cities of Vernon, Maywood, Huntington Park, Bell, Cudahy, South Gate, Downey, Paramount, Lakewood, Long Beach, Carson and Los Angeles (Wilmington). The distance traversed is approximately 32 kilometers (20 miles). See Figure 2-1.

Beginning at the north end of the corridor, rail improvements under this alternative would include two track connections in both directions to the UPRR Los Angeles Subdivision and the Burlington Northern Santa Fe Corporation (BNSF) San Bernardino Subdivison, to the east only. The proposed trainway would follow the existing UPRR San Pedro Branch from the East L.A. Yard/Hobart Tower area to Thenard Junction, in the vicinity of Lomita Boulevard. From Thenard Junction, the corridor diverges, with two tracks going to the Port of Long Beach, two tracks going to Terminal Island and one track going to the Port of Los Angeles. Long sidings south of I-405 would facilitate movements into and out of the Southern Pacific Transportation Company (SPTC) intermodal Container Transfer Facility (ICTF). Eighteen undercrossings were identified for this alternative. At Imperial Highway and Garfield Avenue, the present alignments make it very difficult to maintain the railroad in an at-grade profile. It was therefore decided to raise the UPRR tracks and cross over both these streets as part of this alternative. At the southern end of this corridor, the trainway would necessitate reconstruction of the Anaheim Street bridge, and south of this point, the trainway would be elevated and carried on a new grade over the roadways.


Wilshire Blvd.
Washington Blvd.
Santa Monica Frwy. (10)
Santa Monica Br.
San Diego Freq. (405)
Culver City
Baldwin Hills
Pacific Coast Hwy. (90)
Coastal Hwy.
City of Los Angeles
L.A.X. Airport
Inglewood
Vista Del Mar
Los Angeles County
Hawthorne
Marine Ave.
Gardena
Beach
Lawndale
Artesia Blvd.
Beach
Torrance
Beach
Verdes Estates
Lomita
Rolling Hills Estates
Rolling Hills
Rancho Palos Verdes
Palos Verdes Dr. West
San Pedro
A.T.S.F. Harbor Br.
S.P.T.C. El Segundo Br.
El Segundo Blvd.
Manchester Ave.
Century Blvd.
92nd St.
Watts
Walnut Park
Vernon
Maywood
Bell
Bell Gardens
Cudahy
South Gate
Lynwood
Compton
Los Angeles County
Carson
Wilmington
City of Los Angeles
Signal Hill
Long Beach
Seal Beach
Monterey Park
East Los Angeles
Montebello
Commerce
Pico Rivera
Norwalk
Paramount
Cerritos
Lakewood
Del Amo Blvd.
Carson St.
Pacific Coast Hwy.
Anaheim St.
7th St.
Ocean Blvd.
Harbor Freq. (110)
Long Beach Freq. (47)
Santa Ana Freq. (5)
Artesia Freq. (91)
Norwalk Freq. (105)
San Gabriel River Freq. (605)
Pomona Freq. (60)
Whittier Blvd.
Imperial Hwy.
Compton Blvd.
Rosecrans Ave.
Lomita Blvd.
Torrance Blvd.
Redondo Beach Blvd.
Sepulveda Blvd.
Gaffey St.
Pacific Ave.
Alameda St.
Wilmington Ave.
Long Beach Blvd.
Atlantic Ave.
Cherry Ave.
Lakewood Blvd.
Bellflower Blvd.
Blue Line
Green Line
Harbor Freeway
Terminal Island Freeway
Los Angeles River
San Gabriel River
Dominguez Channel
Pacific Electric R.R.
A.T.S.F. Watts Yd.
U.P. Los Angeles Br.
A.T.S.F. Santa Ana Br.
S.P.T.C. La Habra Br.
S.P.T.C. Los Nietos Br.
S.P.T.C. L.A. Transportation Center
Union Station
Central Ave.
Santa Fe Ave.
Alameda St.
26th St.
41st St.
Vernon Ave.
38th St.
Slauson Ave.
Florence Ave.
Firestone Ave.
Southern Ave.
Nadeau
Pacific
Long Beach Blvd.
Alameda St.
Wilmington Ave.
Atlantic Ave.
Cherry Ave.
Lakewood Blvd.
Bellflower Blvd.
Del Amo Blvd.
Carson St.
Lomita Blvd.
Pacific Coast Hwy.
Anaheim St.
7th St.
Ocean Blvd.
Gaffey St.
Pacific Ave.
Harbor Freeway
Terminal Island Freeway
Long Beach Freeway
Los Angeles River
Blue Line
Green Line
A.T.S.F. Watts Yd.
Terminal Island
8th St.
Sepulveda Blvd.
Lomita Blvd.
Torrance Blvd.
Redondo Beach Blvd.
Dominguez Channel
Pomona Freq. (60)
Whittier Blvd.
Imperial Hwy.
Compton Blvd.
Rosecrans Ave.
Norwalk Freq. (105)
Artesia Freq. (91)
Artesia Blvd.
Del Amo Blvd.
Carson St.
Pacific Coast Hwy.
Anaheim St.
7th St.
Ocean Blvd.
San Diego
Los Coyotes Diagonal
San Gabriel River Freq. (605)
San Gabriel River
Santa Ana Freq. (5)
Norwalk Freq. (105)
Artesia Freq. (91)
Pomona Freq. (60)
Whittier Blvd.
Imperial Hwy.
Compton Blvd.
Rosecrans Ave.
Lomita Blvd.
Torrance Blvd.
Redondo Beach Blvd.
Sepulveda Blvd.
Gaffey St.
Pacific Ave.
Alameda St.
Wilmington Ave.
Long Beach Blvd.
Atlantic Ave.
Cherry Ave.
Lakewood Blvd.
Bellflower

2.2.2 Los Angeles River Route

The Los Angeles River has been suggested in the past as a potential route for a number of transportation facilities, including freight rail. For this project, the river corridor alternative would begin at the Downey Road bridge in the north (south of Bandini Boulevard) and extend southerly to the Union Pacific bridge (south of Del Amo Boulevard). The length of the corridor would be approximately 24.1 kilometers (15 miles). The Los Angeles River is maintained by the Los Angeles County Flood Control District (LACFD), except for a portion that is controlled by the United States Army Corps of Engineers (USACOE). In order to complete the required rail connections at the southern end of the project, the trainway would be required to leave the Los Angeles River route near Cota crossing and assume an alignment along the southern reach of the UPRR route. The Los Angeles River corridor is shown in Figure 2-2.

To maintain the river's flood control capacity and avoid major construction in the river, it was determined that only alignments outside the river channel would be considered. Two alternative alignments were defined. The first alternative would begin on the west side of the river south of Bandini Boulevard and ascend to cross over Atlantic Boulevard. It would remain elevated, continuing south until Imperial Highway. Beginning at a point south of I-710 and north of Imperial, the alignment would descend, passing beneath the I-105 freeway and continuing south beneath the street crossings on the west side of the west levee. After crossing Artesia Boulevard, the trainway would ascend and turn southeast, crossing over the river and continuing in an elevated configuration parallel to the river. Once the trainway passes over Del Amo Boulevard, it would descend, crossing the river and passing beneath the Metro Blue Line and over the Long Beach freeway, joining the UPRR alignment.

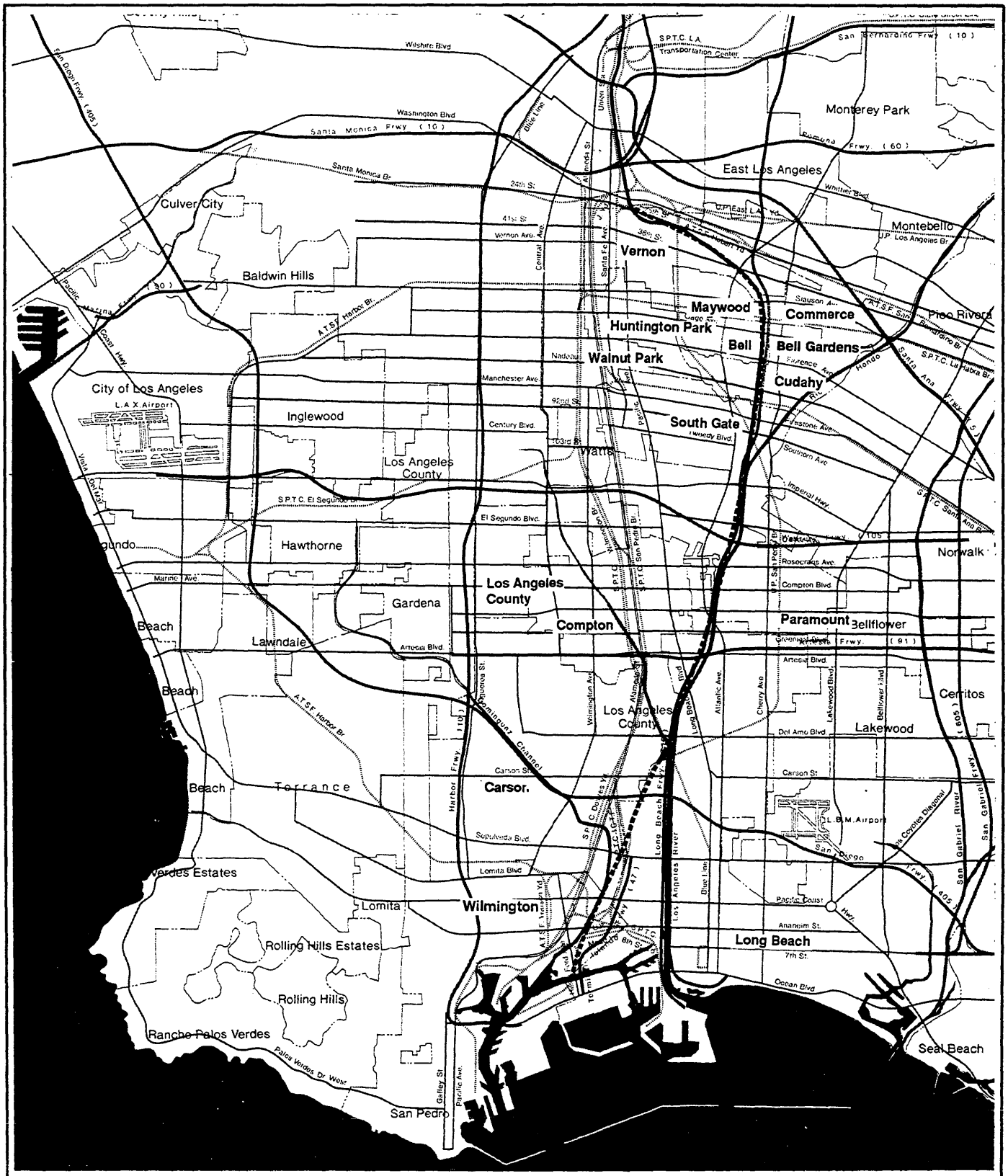
The second river alignment alternative would also begin on the west side of the west levee, and it would continue south in a depressed configuration, passing beneath the major streets and the UPRR bridge. From this point southward, the alignment would generally follow the previously-described alignment alternative, except that the trainway would be depressed, passing beneath I-710 and Imperial Highway. This option would require raising nine additional bridges in order to provide the necessary vertical clearances.

2.2.3 Combination UPRR / Los Angeles River Route

A third alternative that emerged during the evaluation is a hybrid alignment that would begin on the UPRR route at the north end of the corridor, continue south along the UPRR route until the Los Angeles River is reached, opposite Tweedy Boulevard, at which point it would assume the river route. The alignment would then proceed south to the Cota crossing, where it would leave the river to assume an alignment along the UPRR route. The combination route is shown in Figure 2-3.

2.2.4 Selection of the Locally Preferred Corridor

The UPRR, Los Angeles River and combination UPRR/Los Angeles River route alternatives were evaluated according to a range of engineering, cost and environmental factors. The results of this evaluation are discussed in detail in a separate document entitled *Feasibility Study of the Pacific San Pedro Branch and Los Angeles River Route as Alternative Consolidated Rail Corridors*, December 1991; and in Section 2.4 of the EIR. As part of this evaluation, population exposure was determined for each of the alternative corridors and compared with the Alameda

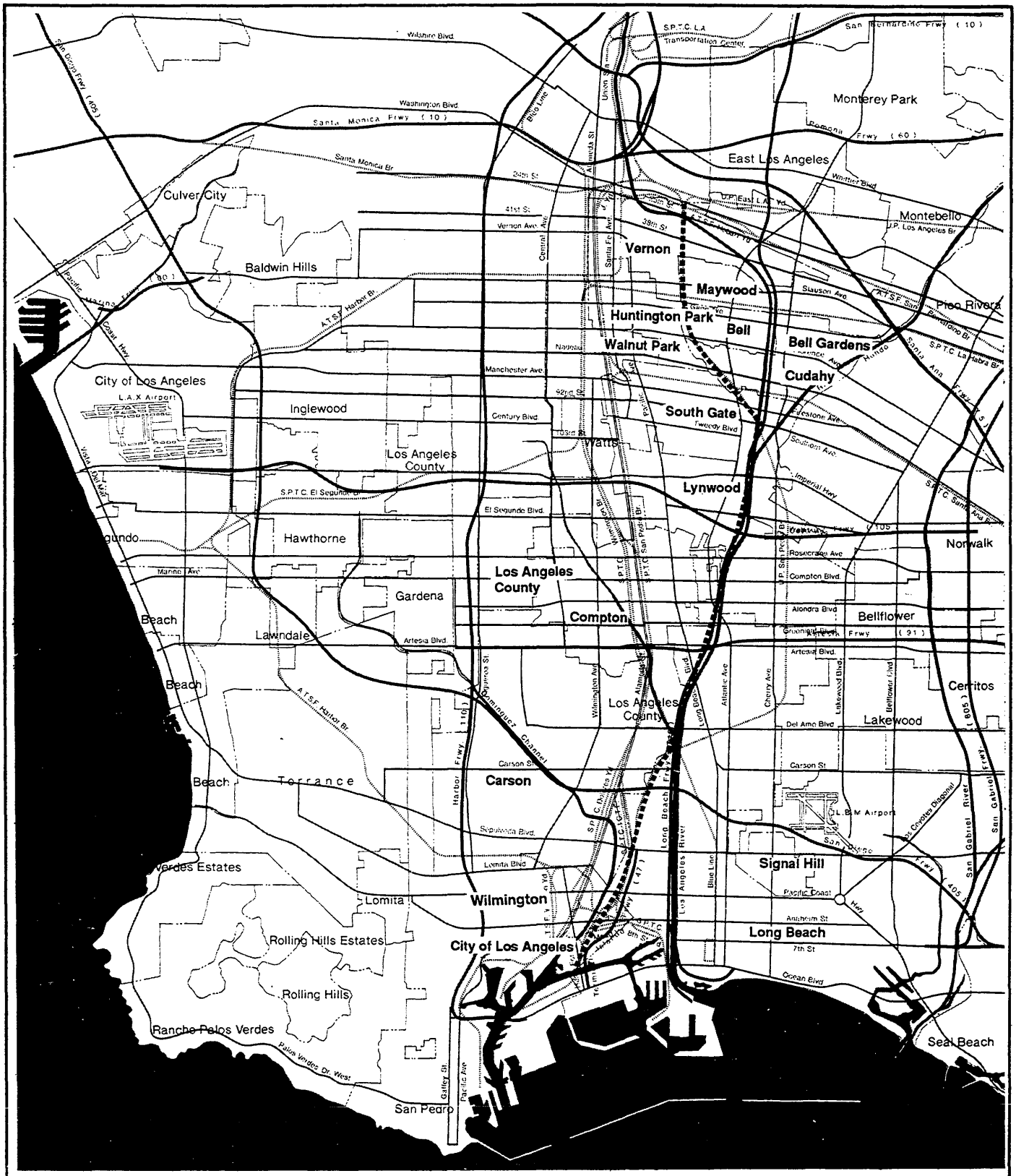


Legend

Los Angeles River Route
Corridor Alternative

Source: DMJM/M&N, 1991

FIGURE 2-2	Los Angeles River Route Corridor Alternative	ALAMEDA CORRIDOR EIS



Legend
Combination U.P.R.R./Los Angeles River Route ▪▪▪
Corridor Alternative

Source: DMJM/M&N, 1991

FIGURE 2-3	Combination U.P.R.R./Los Angeles River Corridor Alternative	ALAMEDA CORRIDOR EIS

Corridor, using 1980 U.S. Census information. This analysis showed the Alameda Corridor to have the least population within 152.5 (500 feet) of its alignment [7,363] and also within 305 meters (1,000 feet) [26,199], as compared with the UPRR route, which had the most population exposure [15,841 within 152.5 (500 feet) & 39,940 within 305 meters (1,000 feet)]. The L.A. River route had a population exposure of 10,223 within 152.5 meters (500 feet) and 32,787 within 305 meters (1,000 feet). The combined UPRR/L.A. River route had a population exposure of 14,067 within 152.5 meters (500 feet) and 34,648 within 305 meters (1,000 feet). Thus, the Alameda Corridor had the least exposure of any of the alternative corridors. It is also useful to note that in the case of the L.A. River option, the population exposure experienced there would be essentially new exposure, since there is no existing freight traffic along that corridor. In the case of the UPRR corridor, there is existing rail traffic, but it is not comparable to the volume currently being experienced along Alameda Street. An estimated eight through-trains per day operated on the UPRR corridor in 1990, as compared with 19 trains per day on the SP corridor. Alameda Street, by contrast, has been an industrial corridor with substantial amounts of freight rail traffic for nearly all of its past history.

Each of the corridors was evaluated in terms of the community facilities that it could affect, once again using proximity [within 305 meters (1,000 feet)] as a surrogate for impact. Taking into account educational institutions, outdoor recreational facilities (parks & golf courses), fire stations, libraries, hospitals and churches, the Alameda Corridor had the most exposure, with 39 total such facilities being located within 305 meters (1,000 feet) of the alignment. The L.A. River route had the greatest exposure of housing projects and mobile home parks [10 within 305 meters (1,000 feet)], whereas the Alameda Corridor had only three such facilities within 305 meters (1,000 feet). The UPRR and UPRR/L.A. River corridors had six and nine housing projects/mobile home parks within 305 meters (1,000 feet), respectively. A comparison of the alternative corridors is presented in Table 2-1.

TABLE 2-1
COMPARISON OF ALAMEDA, UPRR AND L.A. RIVER CORRIDORS

COMPARISON CATEGORY	ALAMEDA CORRIDOR	UPRR CORRIDOR	L.A. RIVER CORRIDOR	UPRR/L.A. RIVER COMBINATION
Population				
within 152.4 meters (500 feet)	7,400	15,800	10,200	14,000
within 305 meters (1000 feet)	26,200	40,000	32,800	34,200
Community Facilities within 305 meters (1000 feet)				
Educational Institutions	17	7	11	9
Parks and Golf Courses	9	11	10	9
Fire Stations	1	4	0	1
Libraries	0	3	2	1
Housing Projects & Mobile Home Parks	3	6	10	9
Hospitals	0	2	1	1
Churches	9	0	0	0
All Community Facilities	39	33	34	30

Source: DMJM; M&N, 1991.

Taking all facilities into account, each of the corridors had roughly the same number of facilities within 305 meters (1,000 feet). The range was 30 total facilities for the UPRR/L.A. River corridor to 39 for the Alameda Corridor.

The evaluation suggested that the L.A. River route would result in the most severe impacts in terms of noise, land use and aesthetics. Single family homes, schools and playing fields abut the river in many neighborhoods, and separation distances are as little as 6.1 meters (20 feet) in some instances. Traffic congestion, on the other hand, would not adversely affect the river route, because the river channel does not have frequent street crossings.

The UPRR route was found to have substantial residential exposure, but not to the same degree as the river route. Adverse effects on residential areas would be expected along the UPRR route, and these effects would be expected to be more substantial than those encountered along the Alameda Corridor. There is a reach of the corridor in the North Long Beach area in which the profile of the UPRR tracks is above grade on an approximately 48.3-meter-high (30-foot-high) embankment. Mitigating the adverse effects of substantial train movements along this embankment would be difficult. Traffic aspects of the UPRR corridor would result in local impacts that would not be the case under the river route.

In addition to the evaluation that was conducted by the project team, the local jurisdictions along the UPRR and L.A. River corridors were contacted for their opinion regarding locally perceived impacts. Comment letters were received from two cities (Downey and Paramount, see Appendix F) and telephone conversations were held with representatives of all but one of the remaining cities (Maywood, Bell, Gardena, Cudahy). Downey, Paramount and Maywood expressed concerns regarding an improved freight rail facility along either route. Paramount also cited its concern for potential hazards to the public. Most cities cited traffic, noise and local land use impacts, which they characterized as potentially severe.

Costs to implement a rail facility in the alternative corridors were found to range from below the estimated cost in the Alameda Corridor, to approximately equivalent. However, these costs do not include roadway improvements of the scale that were being proposed under the Alameda Corridor option as it was defined at that time. In fact, the use of either the UPRR or L.A. River routes would provide essentially only a rail facility, and accommodation of vehicular traffic would not be addressed unless a separate project were also to be considered.

For the reasons discussed above, the UPRR, L.A. River and combination UPRR/L.A. River alternative corridors were rejected in favor of the Alameda Corridor.

2.3 ALTERNATIVE CONFIGURATIONS OF THE ALAMEDA CORRIDOR

The various trainway, roadway and grade separation options described below and their evaluation are discussed in greater detail in the *Concept Study of Railroad and Highway Improvements for the Development of the Alameda Corridor*, DMJM/M&N, 1992; and in Section 2.4 of the EIR.

2.3.1 Typical Trainway Sections

Three alternative sections were considered for the trainway: an at-grade section, a depressed (below grade) section and an elevated section.

An at-grade trainway configuration would place two mainline train tracks at grade in the same general area as the existing tracks in Alameda Street. An existing drill track would be maintained adjacent to the main line tracks to continue to provide local service to industrial customers.

A depressed trainway configuration would place the two main line rail tracks in a trench that would be approximately 9 meters (30 feet) in depth below existing Alameda Street. An existing drill track would continue to be provided at grade, adjacent to the main line tracks. The trench would be required to return to grade in the vicinity of State Route 91, in order to cross over Compton Creek.

An elevated trainway configuration would place the two mainline rail tracks on an overhead structure or retained embankment along the length of Alameda Street, with an at-grade drill track to provide local service. The structure or embankment would need to be 6.1 to 10.7 meters (20 to 35 feet) in height to provide necessary clearances for the at-grade street system. This configuration was rejected early in the process because it would introduce a large intrusive above-ground structure, which was judged to have unacceptable noise and visual impacts, into the surrounding area.

2.3.2 Typical Roadway Sections

A range of sections was developed for the roadway component of the project, as described below. These options generally involved either splitting the roadway into a couplet straddling the rail tracks, or placing all of the roadway lanes on one side of the train tracks. In addition, some options retained use of the existing east barrel of Alameda Street (also referred to as "Little Alameda"), which could then function as a frontage road.

A one-way couplet option would place the train tracks between a pair of one-way streets, each of which could contain two or three lanes for through traffic movement. This option, which is preferable in areas with limited existing right-of-way, can be used with either the at-grade or depressed trainway configurations.

A one-way couplet configuration with exclusive truck lanes would add an elevated roadway in selected areas along Alameda Street to permit truck traffic to be separated from general purpose traffic. The concept would provide a dual one-way couplet for vehicles and exclusive truck lanes, separated by a barrier. The one-way directional lanes would be divided by the trainway. In the vicinity of selected highway/railroad grade separations, the exclusive truck lanes would be elevated. This arrangement has the advantage of improving overall operating speeds by eliminating many intersection conflicts. It could be used, however, only with the depressed trainway configuration. It could not be used in the City of Vernon due to physical constraints, and therefore much local congestion would result there. This arrangement would limit general purpose traffic to two lanes in either direction, and it would require an extremely costly structure. It was also determined that the demand for the facility, when compared to the construction cost, was not as favorable as originally anticipated. For these reasons, this option was also rejected by the ACTA Governing Board.

A two-way roadway with median configuration would place four or six lanes of two-directional general purpose traffic on one side of the trainway, with the lanes being separated by a painted median for left turning vehicles. It could be used with either the at-grade or depressed trainway

options, although it would also require providing a frontage road on the side not served by the main roadway, in order to maintain access to adjacent properties. This option is preferable, due to its superior local access, in areas where right-of-way is more generous. This configuration requires more right-of-way than the one-way couplet.

A two-way roadway with grade separation along Alameda Street providing longitudinal overcrossings or undercrossings at major east-west streets would enhance traffic flow along Alameda Street. This configuration would require an extensive amount of right-of-way, and it was rejected for cost and impact reasons.

The two-way roadway with dual frontage roads alternative involves depressing Alameda Street below grade and providing tight urban diamond or slip ramp interchange points to at-grade two-way frontage roads along the entire length of the corridor. This configuration, which would accompany the depressed trainway configuration, would provide a two-way frontage road on both sides of the roadway/trainway facility. This would permit the highest level of service along Alameda Street, while at the same time maximizing access to properties on either side. It would, however, also require the maximum right-of-way of all alternatives considered; up to 76.2 meters (250 feet). This option was rejected for reasons of cost and impact. Within the City of Compton alone, about 80 buildings on the west side of Alameda Street (including a portion of K Mart) would have to be acquired to implement this alternative.

2.3.3 Grade Separations

In conjunction with the alternative trainway/roadway configurations along Alameda Street, grade separations for selected east-west streets along the corridor were explored to permit effective railroad operations and improve traffic flow. For at-grade railway alternatives, these grade separations (overpasses or underpasses, depending upon the constraints or opportunities at any given location) were considered and all other points of at-grade crossing of the tracks would be closed. A number of locations were considered for east-west grade separation, because they are major crossings along the corridor and because they satisfied a minimum delay threshold (see page 2-11 of the EIR for a list of locations considered for grade separation).

In addition to transverse grade separations, a longitudinal roadway with elevated overcrossings along Alameda Street was also suggested. This option would use either the two-way roadway or the one-way couplet arrangement but would add elevated structures along Alameda Street at major east-west street crossings. This arrangement would maintain traffic speed for through traffic at those major intersecting streets. It would also, however, require costly structures and an undulating appearance and ride quality. This option was rejected for these reasons.

2.4 ALTERNATIVES CONSIDERED FURTHER

The trainway, roadway and grade separation options described above were applied in various combinations, resulting in a range of alternatives to be further evaluated. (See Section 2.2.3 of the EIR for further discussion of these preliminary alternatives.

The alternative corridor configurations were evaluated in terms of their ability to satisfy the project goals outlined in Section 2.1, above. (Section 2.4 of the EIR discusses the evaluation process used.) The evaluation results indicated that the distinctions among alternatives were sufficiently small to require that other factors should be considered.

A summary of the project alternative configurations considered for the Alameda Corridor is provided in Table 2-2.

TABLE 2-2
ALAMEDA CORRIDOR ALTERNATIVE CONFIGURATIONS

NO.	COST (in millions of dollars, rounded)	DESCRIPTION	DISPOSITION
NO BUILD	N/A	Existing S.P. Branch and 3 other rail lines with 4-lane Alameda Street and existing Frontage Road	Considered viable; carried forward into the EIR.
1.0	1,590	At-grade trainway with 6-lane Alameda Street	
2.1A	1,781	Depressed trainway with 6-lane Alameda Street	
2.2	1,769	Wilmington Diversion depressed trainway with 6-lane Alameda Street	
2.3	1,713	Depressed trainway north of Rosecrans Avenue with 6-lane Alameda Street	Considered viable. Embodied within Alternative 2.1A and therefore not carried forward into the EIR as separate alternatives.
2.4	1,550	Depressed trainway north of Firestone Boulevard with 6-lane Alameda Street.	
3.0	1,904	Depressed trainway with 6-lane Alameda Street west of trainway and frontage road west of trainway	One of two relatively costly alternatives considered. Would place depressed trainway in close proximity to existing structures. Rejected from further consideration.
4.0	2,050	At-grade trainway with elevated exclusive truck expressway above Alameda Street	Determined to have highest construction cost. Judged to be not cost effective when compared with low traffic demand. Raised substantial concerns regarding noise and traffic impacts on local streets. Rejected from further consideration.
5.0	1,580	At-grade trainway with 4-lane Alameda Street	Trainway portions identical to Alternatives 1.0, 2.1A, 2.2, 2.3 and 2.4, respectively. 4-lane Alameda Street embodied within the "No Build" alternative. Considered viable, but not carried into the EIR as separate alternatives.
6.1	1,763	Depressed trainway with 4-lane Alameda Street	
6.2	1,763	Wilmington Diversion depressed trainway with 4-lane Alameda Street	
6.3	1,735	Depressed trainway north of Rosecrans Avenue with 4-lane Alameda Street	
6.4	1,557	Depressed trainway north of Firestone Boulevard with 4-lane Alameda Street	

Note: Cost estimates are escalated to Fiscal Year (FY) 1997 and include construction, R/W, utility relocation, engineering and construction management, financing and legal costs and project reserve. It should be noted that the No Build alternative would also likely require the individual railroads to make some improvements that are not considered in the context of this EIS.

Source: Myra L. Frank & Associates, Inc., 1994; DMJM, 1992.

As a result of the evaluation, and taking into account the findings and conclusions discussed above, the options identified above as rejected were dropped from further consideration, and five alternatives were assessed in detail in the EIR: No Build; Alternative 1 – At-grade trainway with six lanes along Alameda Street; Alternative 2.1A – Depressed trainway along Alameda Street with six traffic lanes; Alternative 2.1S – Depressed trainway with sloped trench walls along Alameda Street; and Alternative 2.2 – Depressed trainway with the Vernon Diversion. The five alternatives assessed in the EIR are described in the following sections. The alternatives assessed in this EIS are described in Sections 2.4.5 and 2.6. (Section 2.5 discusses the selection of the locally preferred alternative.)

2.4.1 Alternative 1.0 (At-Grade Trainway)

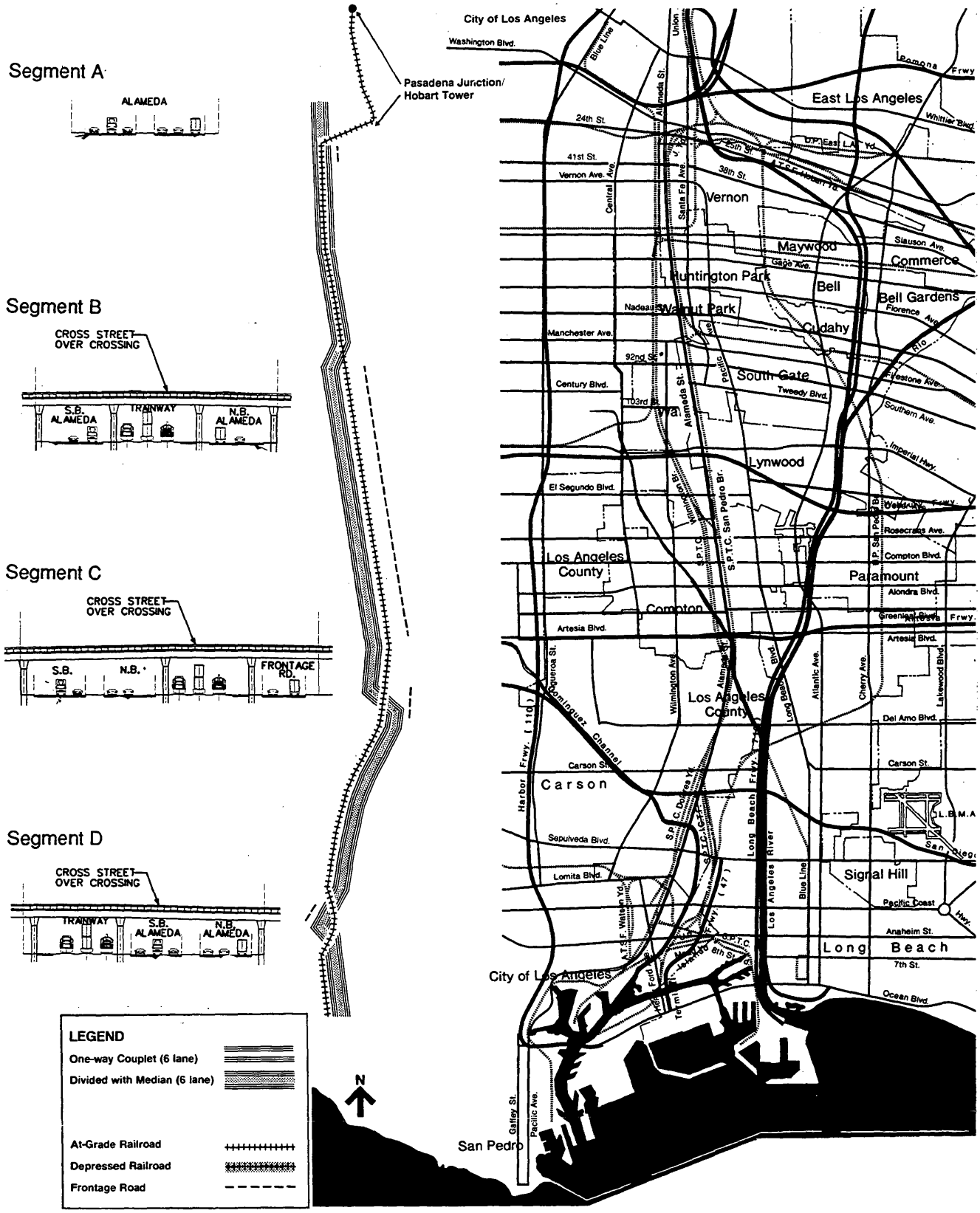
Alternative 1.0 (see EIR Section 3.2) would provide a consolidated freight rail corridor consisting of an at-grade two-track railroad main line with drill track, together with a six-lane roadway section throughout. At 22 selected streets, above- and below-grade east-west grade separation structures would be provided. The combined trainway/roadway arrangement in Alameda Street would vary from a one-way couplet with trainway in the center, to the trainway on one side of a six-lane roadway, as illustrated on Figure 2-4. In some locations a two-lane frontage road would also be provided.

Beginning at the north end of the corridor, modifications to the railroad tracks would be made in the Redondo Junction and J Yard areas to provide room for the consolidated trainway. The trainway would be redirected in a north-south direction as it approaches Alameda Street. Beginning in the vicinity of 25th Street, the trainway would be parallel to Alameda Street and approximately centered in the existing railroad right-of-way.

Rail improvements would proceed south from SR 91 along Alameda Street until a junction is reached between the Southern Pacific tracks along Alameda Street and the Burlington Northern Santa Fe Corporation (BNSF) Harbor Subdivision tracks, at which point the corridor tracks would leave Alameda Street for the ATSF tracks proceeding south to the Dominguez Channel. The trainway would run along the west bank of the Dominguez Channel under the Anaheim Street bridge, then up and over the Dominguez Channel on a bridge to connect with the existing Union Pacific San Pedro Branch and the project terminus on the north side of the Badger Avenue Bridge which spans the Cerritos Channel.

Roadway improvements to Alameda Street would begin in the area of the I-10 freeway interchange. Alternative 1 would provide six lanes of traffic. A two-way arterial (three lanes in each direction), separated by a painted median with turning lanes, would extend from I-10 to 25th Street (see Segment A on Figure 2-4). At this point, the northbound and southbound lanes would divide to form a one-way couplet, with the trainway in the center (see Segment B on Figure 2-4).

South of Nadeau Street, the roadway shifts to the west side of the trainway, where it becomes a two-way roadway, separated by a painted median. This configuration continues south to the vicinity of Del Amo Boulevard. A frontage road is provided between 92nd Street and SR 91. See segment C on Figure 2-4.



Source: DMJM/M&N, 1991

FIGURE 2-4	Corridor Configuration Alternative 1	ALAMEDA CORRIDOR EIS

South of SR 91, Alameda Street is being improved by the Ports Access Demonstration Projects. See Section 2.10.2 for a description of these improvements. In the vicinity of Laurel Park Road, Alameda Street improvements would pass beneath the consolidated trainway and occupy a position on the east side of the trackage (see segment D on Figure 2-4). A small segment of frontage road would be provided where this transition takes place.

The proposed roadway improvements would continue south to the intersection of Alameda Street and Henry Ford Avenue, a short distance to the north of Anaheim Street. The roadway improvements would continue south along Henry Ford Avenue to its intersection with State Route 103 (Terminal Island Freeway), where a reconstructed interchange would be provided.

For a more detailed discussion of typical sections and corridor configurations under this alternative, see Section 3.2 of the EIR.

As noted in Section 2.5, this alternative has been rejected in favor of the depressed railway alternatives because a) it would require substantially more right-of-way, resulting in substantially greater displacement of persons and businesses, and b) it would require up to 18,287 lineal meters (60,000 linear feet) of soundwalls which was seen as creating a substantial neighborhood barrier.

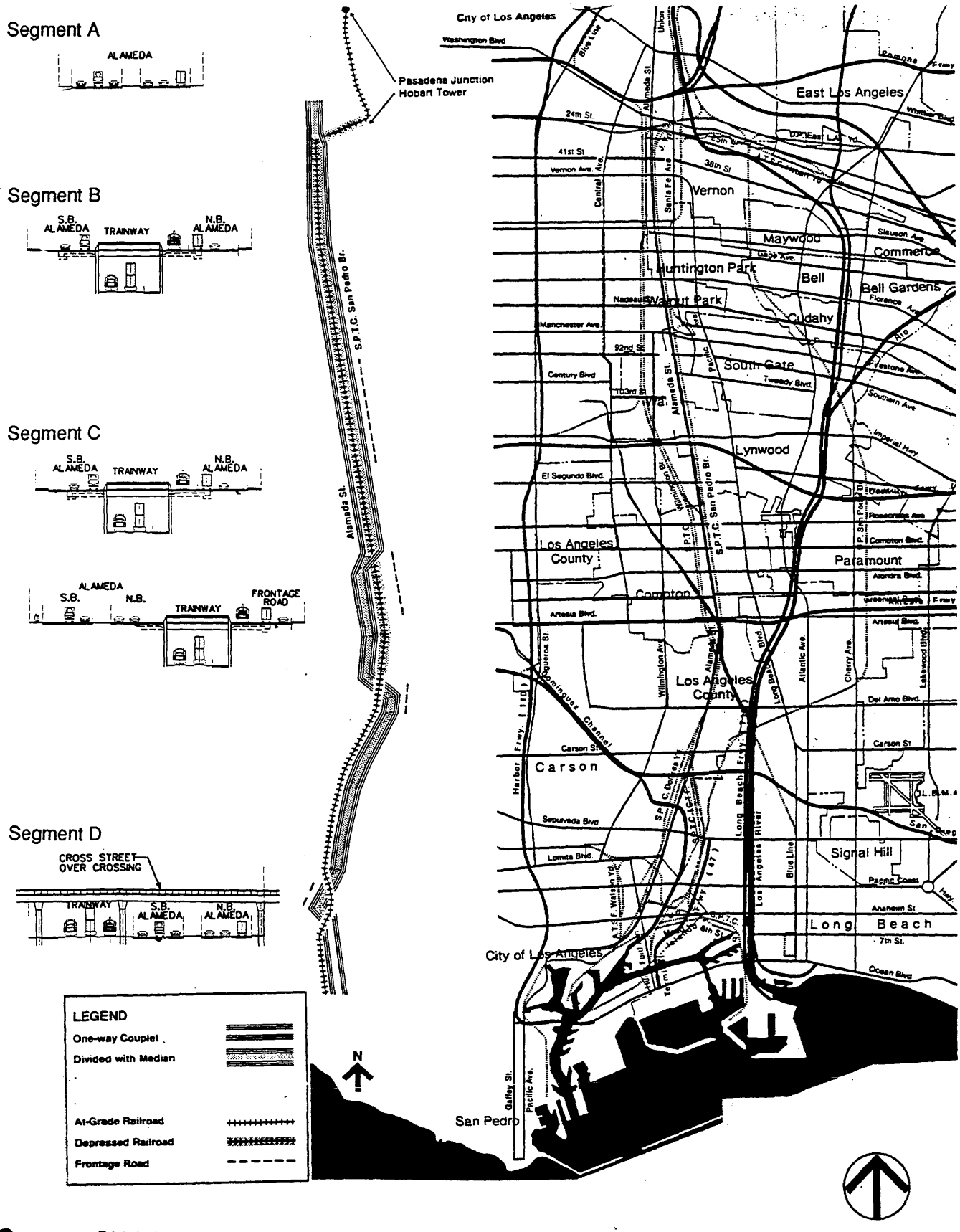
2.4.2 Alternative 2.1A (Depressed Trainway with 6 Lanes on Alameda)

Alternative 2.1A (see EIR Section 3.3) would consist of a depressed trainway providing for two main line consolidated freight rail tracks. Vertical retaining walls would be provided on both sides of the depressed trainway. This alternative also includes an at-grade drill track, to provide for local industrial service, and a six-lane roadway facility, configured as a one-way couplet of three lanes in each direction. Grade separations would be provided by means of at-grade street overpasses crossing over the depressed trainway. See Figure 2-5.

From Redondo Junction, the trainway would extend through J Yard in an alignment that traverses the yard area further north than under Alternative 1.0, to allow a fully depressed trainway to be achieved by the time Alameda Street is reached at 25th Street. The trainway would proceed south in a depressed configuration along Alameda Street until south of Greenleaf Boulevard, where it begins to ascend to an at-grade section south of SR 91. The trainway would be at-grade at the crossing of Compton Creek. South of this point, the alignment of both the trainway and roadway improvements is the same as Alternative 1.0.

Roadway improvements in this alternative consists of a one-way couplet straddling the trainway from I-10 until Compton Boulevard. A frontage road would be provided on the east side of the corridor between 92nd Street and El Segundo Boulevard. From Compton Boulevard until the vicinity of Del Amo Boulevard, the roadway would be on the west side of the trainway. A frontage road would be provided between Compton Boulevard and south of Greenleaf Boulevard. Grade crossings in this alternative would be provided in the form of at-grade street overpasses crossing over the depressed trainway. (See Segments A, B, C and D on Figure 2-5).

For a more detailed discussion of typical sections and corridor configurations under this alternative, see Section 3.3 of the EIR.



Source: DMJM/M&N, 1991

FIGURE 2-5	Corridor Configuration Alternative 2.1A	ALAMEDA CORRIDOR EIS

As noted in Section 2.5, this alternative was designated as the locally preferred alternative, although it was modified to reduce the roadway component from six lanes to only the reconstruction of present day Alameda Street (see Section 2.6 for further discussion of the modified alternative).

2.4.3 Alternative 2.1S (Depressed Trainway with Sloped Walls)

Alternative 2.1S (see EIR Section 3.4) would be similar to Alternative 2.1A except that the trainway trench would have sloped walls for a portion of the vertical rise. This variation of the basic trench design was offered as a means of reducing construction costs. Grade separations in this alternative would also be provided by means of at-grade street overpasses crossing over the depressed trainway.

The configuration of the alternative would be essentially the same as under Alternative 2.1A, namely, a depressed trainway with at-grade roadways and drill track. The roadway would be configured as a one-way couplet straddling the trainway in some locations and a six-lane roadway on the west side of the tracks in other locations, as described for Alternative 2.1A, above. Immediately adjacent to the trainway at grade would be the drill track. Crossings over the trainway would be accomplished through the use of at-grade street overpasses at the same locations as those in Alternative 2.1A.

Because the trench would be constructed using a combination of retaining and sloped walls, the right-of-way requirements would be more extensive in some areas.

For a more detailed discussion of this alternative, see Section 3.4 of the EIR.

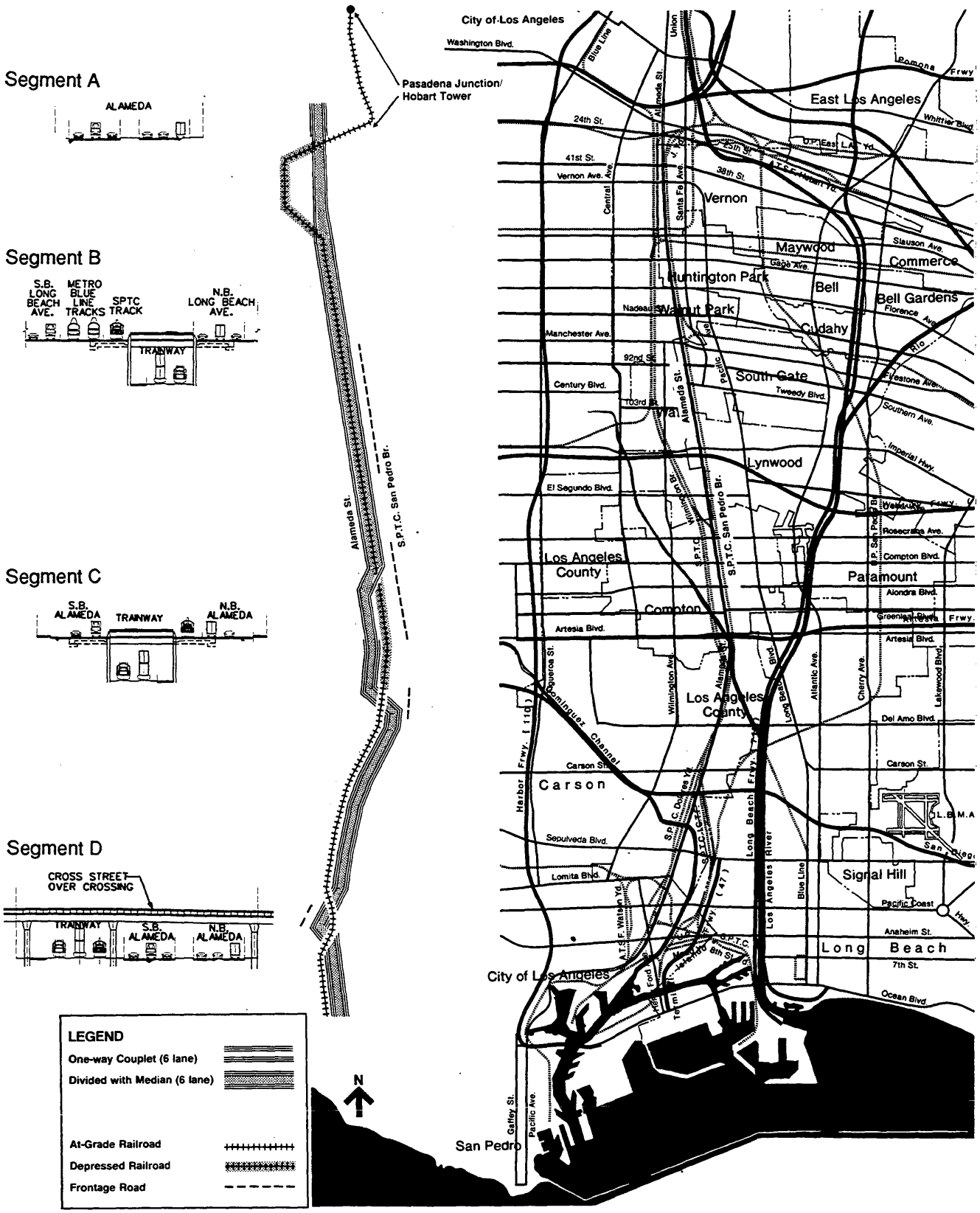
As noted in Section 2.5, this alternative has been rejected due to its right-of-way requirements.

2.4.4 Alternative 2.2 ("Vernon Diversion")

This alternative (see EIR Section 3.5) generally would follow the same trainway and roadway alignments as Alternative 2.1A north of 25th Street and south of Randolph Street, with the exception of small differences in railroad configuration. Between 25th Street and Randolph Street, however, the depressed trainway would follow an alignment along the Southern Pacific Wilmington Branch, which parallels Long Beach Avenue to the west of Alameda Street. See Figure 2-6. Also present in this segment are two at-grade tracks in the Metro Blue Line passenger service and the SP Wilmington Branch line corridors.

Between 25th Street and Randolph Street, the roadway improvements would consist of a two-way, six-lane facility, separated by a paved median, with an at-grade drill track. For a more detailed discussion of this alternative, see Section 3.5 of the EIR. As noted in Section 2.5, this alternative has been rejected because of its adverse noise impacts and impacts on public housing.

Two alternatives remain under consideration in this EIS. The first is the No Build alternative and the second is Alternative 2.1B (which is similar to Alternative 2.1A). Alternative 2.1.B. has emerged from the Concept Engineering/CEQA process as the locally preferred alternative. The following sections describe these alternatives.



Source: DMJM/M&N, 1991

FIGURE 2-6	Corridor Configuration Alternative 2.2	ALAMEDA CORRIDOR EIS

2.4.5 NO BUILD ALTERNATIVE

2.4.5.1 Current Freight Railroad Operations

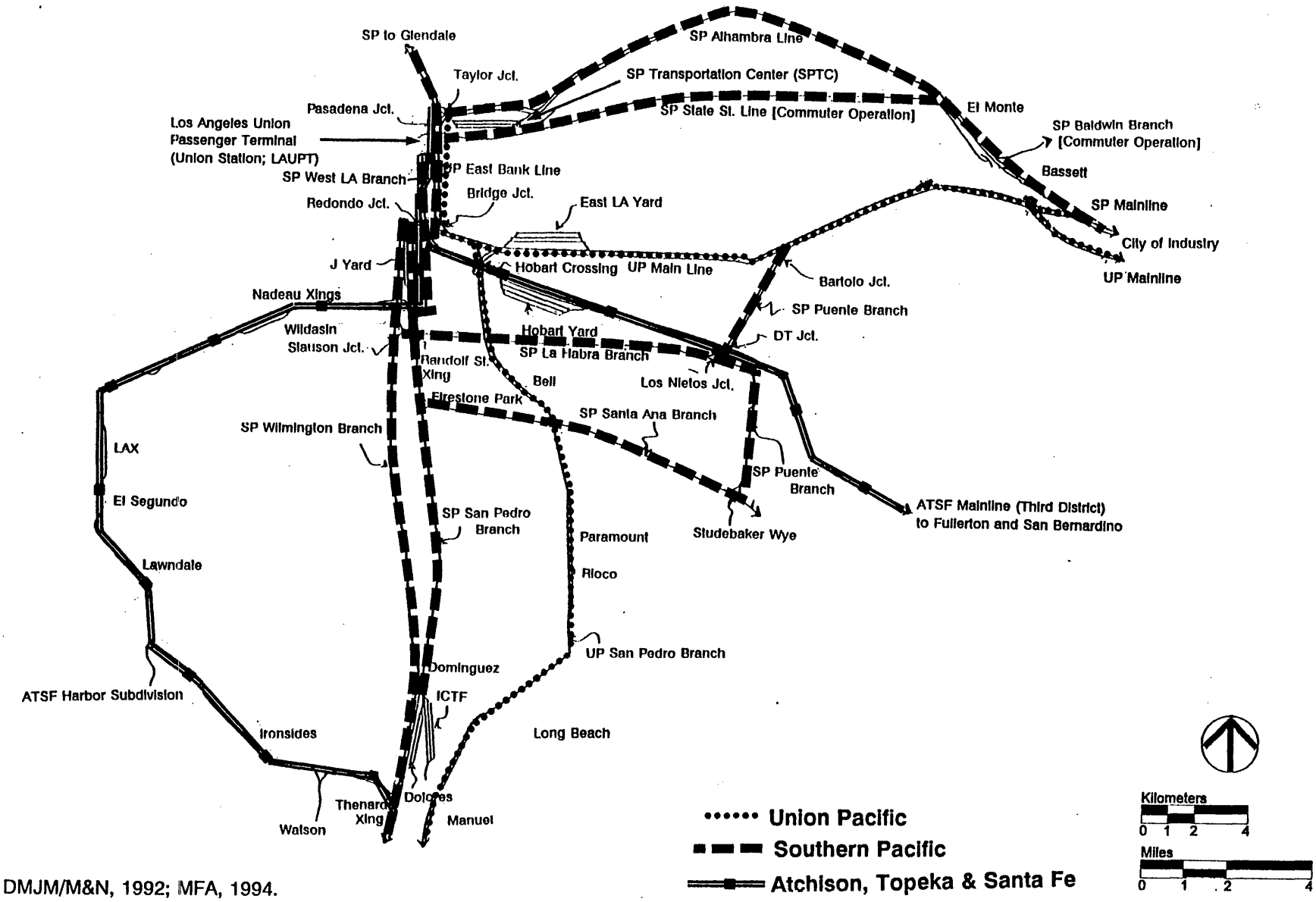
Currently, freight rail movements of cargo into and out of the ports of Los Angeles and Long Beach are handled on the independent trackage of the three rail carriers operating in the region, namely the Southern Pacific (SP), Union Pacific (UP), and Burlington Northern Santa Fe Corporation (BNSF) railroads. The No Build Alternative (see EIR Section 3.1) would continue this mode of operation. Goods movement by truck is currently handled by the area street and freeway systems, including Alameda Street as it is currently configured. This also would remain under the No Build alternative. One exception involves a series of projects, referred to as the Ports Access Demonstration Projects, which would make certain improvements to Alameda Street, south of State Route 91. These are discussed in Section 2.10, Related Projects.

The following sections summarize the existing and future railroad freight and passenger operations and Alameda roadway improvements. (For a more detailed discussion of railroad operations, see Section 3.1 of the EIR).

Train operations to and from the ports and within southern California can be divided into two types: through train movements and local train movements. Some of these movements are associated with activity at the ports. Port-related through trains include bulk unit trains (carrying coal, white bulk and slab steel), intermodal trains (carrying containers taken from ships at the ports) and unit auto trains. Through trains not related to the ports include unit oil trains and general carload trains (carrying a mixture of cars and goods). Through trains account for the vast majority of movements affecting ports-related trackage. Certain freight movements operate on a regular basis, whereas other train movements are operated on a more flexible, as-needed basis. Local trains (also referred to as "road" or "zone" switchers), have regularly scheduled operations, and they are based in specific locations. Some of the local trains also carry goods to destinations within Southern California, and others conduct switching activity.

Currently a total of 28 through train movements per day occur on tracks linked to the ports. Nearly two thirds (61 percent) of these movements occur on SP lines (17 trains per day); 28 percent of the through movements occur on UP lines (8 trains per day), and 11 percent occur on Burlington Northern Santa Fe lines (3 trains per day).

Current railroad service to the ports of Long Beach and Los Angeles extends from the crossing of the Cerritos Channel on the Badger Avenue Bridge to the vicinity of SR-103, at which point the tracks of the three carriers diverge along separate routes. Proceeding northerly from this point, the three carriers all follow routes to the general area extending from South Gate to the northern portion of downtown Los Angeles, and then northerly and easterly to main line tracks that then carry freight out of Southern California to destinations throughout the United States. The routes used by the three carriers are described below and are shown collectively in Figure 2-7. (See Section 3.1 of the EIR for a detailed description of the routes currently used by each of the carriers and streets that are crossed by the railroads.)



Source: DMJM/M&N, 1992; MFA, 1994.

FIGURE 2-7	Existing Freight Rail Carrier Routes	Alameda Corridor EIS

2.4.5.2 Future Freight Railroad Operations

According to current forecasts, total through train movements to and from the ports are expected to reach 73 per day by the year 2010 and 97 per day by the year 2020. SP's share of this traffic is anticipated to be approximately 45 percent (33 trains per day) by the year 2010 and 40 percent (39 trains per day) by the year 2020. UP trains are projected to be 32 percent (23 trains per day) in 2010 and 35 percent (34 trains per day) in 2020. The ATSF is expected to move 23 percent (17 trains per day) of through trains in the year 2010 and 25 percent (24 trains per day) in the year 2020.

For purposes of planning and estimating the effects of rail operations, it is assumed that overland common point (OCP) traffic will account for 50 percent of all containerized cargo entering the ports of Los Angeles and Long Beach in 2010, as compared with 35 percent at the present.

Also for purposes of planning and estimating, it is necessary to make certain assumptions regarding typical train lengths. A standard train length of 2,438 meters (8,000 feet) is assumed for intermodal trains leaving the Port of Los Angeles and the SP Intermodal Container Transfer Facility (ICTF, southeast of 223rd Street and Alameda Street). Due to physical constraints, intermodal trains would be shorter leaving the Port of Long Beach [average length, 16,46 meters (5,400 feet)]. Other trains are assumed to have the following lengths: steel slab - 1,829 meters (6,000 feet); coal - 1,463 meters (4,800 feet); white bulk - 1,829 meters (6,000 feet); autos - 762 meters (2,500 feet); crude oil - 1,372 meters (4,500 feet); carload - 914 meters (3,000 feet).

If freight rail consolidation does not become a reality, each of the three carriers would move trains along their respective routes, essentially the same as the routing used at the present time. Local switching assumptions have also been made that are consistent with current operations. The No Build alternative presumes the movement of daily through trains to and from the ports by the three carriers as follows (referred to as Status Quo routing):

Southern Pacific (described in the northbound direction)

- Wilmington Branch - La Habra Branch - Puente Branch - Main Line
- San Pedro Branch - Santa Ana Branch - Puente Branch - Main Line
- Wilmington Branch - "J" Yard - UP - West L.A. Branch - LATC - Main Line
- San Pedro Branch - West L.A. Branch - LATC - Main Line

For the vast majority of train movements along SP lines, westbound trains would typically use the La Habra and Wilmington branches, whereas eastbound trains would typically use the San Pedro and Santa Ana branches. A much smaller proportion of train movements would take place on the main line out of the area to the north from Pasadena Junction. Those movements would also operate in a coupled fashion, with northbound movement following the San Pedro Branch and southbound movements following the Wilmington Branch.

Union Pacific (northbound direction)

- UP San Pedro Branch - East L.A. Yard - Main Line

Burlington Northern Santa Fe (northbound direction)

- Harbor Subdivision - Redondo Junction - Hobart Yard - Main Line

Status Quo Trackage

In order to provide for the orderly movement of trains into and out of the region, it will be necessary for some improvements to the existing rail trackage to be implemented. It is assumed that these improvements would be undertaken by each of the three carriers, in response to their own operational needs, as follows.

For SP routes:

- Two main tracks between the City of Industry and Los Nietos Junction, with improved signaling.
- New direct connection between SP Puente and La Habra branches at Los Nietos Junction.
- Two main tracks added between Bridge Junction and Ninth Street Junction, in the "J" Yard area, coupled with placement of this area under a single traffic control authority.

For the UP San Pedro Branch:

- Improved signaling.
- Two main tracks from East L.A. Yard to south of Bell Crossing [7.2 kilometers (4.5 miles)].
- Two main tracks through Paramount [5,486 meters (18,000 feet)].
- Two main tracks from north switch at Manuel to SP connections at Thenard.

For the ATSF Harbor Subdivision:

- Improved signaling.
- 2,438 meter (8,000 foot) passing tracks at Wildasin, Lairport, Lawndale and Ironsides.
- Two main tracks from Watson Wye to SP connection at Thenard.

2.4.5.3 Passenger Operations

In addition to freight train movements on the various rail lines in the region, there is ongoing development of intercity and passenger commuter rail service that has begun and is expected to continue. At the present time, 14 Amtrak trains per day traverse the ATSF main line at Redondo Junction. For purposes of planning, the following intercity and commuter passenger train operations are assumed:

- Former SP State Street Line and former SP Baldwin Park Branch (service to San Bernardino) - 18 trains per day in 2010; 50 trains per day in 2020. These tracks are now owned by the Southern California Regional Rail Authority.

- ATSF San Bernardino Subdivision (service to Orange and Riverside counties) - 56 trains per day in 2010; 84 trains per day in 2020. The Southern California Regional Rail Authority has trackage rights over this line.

The MTA is currently engaged in an ambitious program to acquire existing rail lines providing access to major trip attractors, including the Los Angeles Central Business District; or rights to operate on selected rail lines, for purposes of operating commuter rail and light rail passenger service. Included among these are UP and ATSF tracks straddling both sides of the Los Angeles River between the Redondo and Pasadena junctions. The operation of passenger service on these lines would have a direct effect on the efficiency of freight movements into the corridor study area from the north.

2.4.5.4 Existing Roadway Improvements

The project study area includes Alameda Street, extending from I-10 in the north, south to Henry Ford Avenue, and then south along Henry Ford Avenue to the north side of the Cerritos Channel, at the Badger Avenue Bridge. Alameda Street is classified as a major highway and it extends for a distance of approximately 32 kilometers (20 miles) within the limits of the study area. Henry Ford Avenue is classified as a primary arterial, and it extends for a distance of approximately 1.6 kilometers (one mile) in the study area. There are a total of 151 street intersections along the study corridor. Of these, 43 are signalized, and 108 are not. Alameda Street passes through a number of municipal jurisdictions, each of which has responsibility for roadway maintenance within the limits of its jurisdiction. The jurisdictions involved include the City of Los Angeles, the County of Los Angeles and the cities of Vernon, Huntington Park, South Gate, Lynwood, Compton and Carson.

Alameda Street runs parallel to the SP San Pedro Branch. In some locations, vehicular travel lanes are located only on the west side, generally consisting of four through lanes with left turn pockets at most intersections. In other locations, Alameda Street has four vehicular through travel lanes on the west side of the railroad right-of-way, together with a two-lane frontage or local access road on the east side of the railroad. This frontage road exists for a substantial portion of the total length of Alameda Street, but it is not continuous throughout. In the southern portion of the route, the vehicular travel lanes are located on the east side of the railroad.

Within the study area, Alameda Street begins at the northern project limit at a grade separation beneath I-10. In the vicinity of 16th Street, freeway on- and off-ramps connect with the eastbound I-10. At this point, Alameda Street is a four-lane facility. Between 25th and 26th streets, Alameda Street has three lanes in the northbound direction and two lanes southbound. At 26th Street, an east side frontage road begins that extends south to a point north of Gage Avenue in the City of Huntington Park. North of Gage, at Randolph Street, Alameda Street is crossed at grade by the SP La Habra Branch tracks.

North of Gage Avenue the roadway is a four-lane facility on the west side only. Between Gage Avenue and Florence Avenue, the section again contains a four-lane west side roadway and two-

lane east side frontage road. From Florence Avenue to Nadeau Street, only a four-lane facility is provided. From Nadeau Street to Short Street, a frontage road again occurs. South of Short Street and north of Firestone Boulevard, at-grade track connections are made between the SP San Pedro Branch and the SP Santa Ana Branch to the east. Between Short Street and 92nd Street, a four-lane street section is provided.

From 92nd Street to north of Artesia Boulevard (in the City of Compton), Alameda Street has a four-lane roadway and a frontage road. The frontage road in this reach has sufficient width for a parking lane in either direction. Between Tweedy Boulevard and Seminole Avenue (in the City of South Gate), the frontage road has been recently reconstructed as a four-lane facility. Between Rosecrans Avenue (in the City of Compton) and north of Artesia, the frontage road is also a four-lane facility, with two lanes provided for parking. At Rosecrans Avenue, an east-west grade separation has been completed that will carry through traffic along Rosecrans Avenue on the overhead structure. Also in this reach, I-105 crosses over Alameda Street. South of Artesia Boulevard is SR-91, which has on- and off-ramps connecting with Alameda Street south of the freeway.

Beginning in the vicinity of SR-91, recent roadway improvements have been made to Alameda Street, extending south almost to the ports. These improvements consist of a new roadway surface, sidewalks, curb and gutter and left turn lanes or pockets. South of SR-91 a short distance, Alameda Street is crossed by the SP Wilmington Branch tracks. From SR-91 south to Manville Street, Alameda Street has three lanes in the northbound direction and two lanes in the southbound direction. From Manville Street to Dominguez Street, four lanes are provided. In the vicinity of Dominguez Street, the roadway crosses under the railroad tracks to put Alameda Street on the east side.

From Dominguez Street to 218th Street (in the City of Carson), Alameda Street is a four-lane facility. From 218th Street to I-405, it is a six-lane facility with a continuous right turn lane in the northbound direction. On- and off-ramps to I-405 connect with Alameda Street north of the freeway. From I-405 to 223rd Street, Alameda Street is a six-lane facility. From 223rd Street to Mauretania Street, where the recent improvements end, it is a four-lane facility. South of Lomita Avenue (at West Thenard Junction), the ATSF Harbor Subdivision tracks cross over Alameda Street.

From Mauretania Street to Henry Ford Avenue, Alameda Street is a four-lane facility. In the vicinity of Henry Ford, the SP Long Beach Branch connects with the San Pedro Branch and proceeds to the east. The project study area proceeds south along Henry Ford Avenue to SR-103.

2.5 SELECTION OF THE LOCALLY PREFERRED ALTERNATIVE

The DEIR compared the four alternatives identified above at an equal level of detail. As a result of completing the environmental documentation and having received comments from the public regarding that documentation, the ACTA Governing Board unanimously adopted the following findings regarding the alternatives:

- *The No Build Alternative was rejected because it did not adequately meet the project goals.* It would also have negative consequences over the long term with regard to:

- traffic delays (15,000 vehicle hours of delay per day as a result of increased congestion in the project area),
- train delays (having no grade separation would not remove existing train-to-train conflicts),
- noise impacts (97 unconsolidated train movements per day would result in adverse noise exposure affecting an estimated 41,500 persons on unconsolidated routes, as compared with 3,600 persons on those same routes with consolidation in place),
- air quality impacts (reductions in regional locomotive and vehicle emissions by 13 to 26 percent, for four of five criteria pollutants; 0.5 reduction for the fifth),
- energy impacts (0.5 percent savings in regional fossil fuel consumption), and
- increased fire and police emergency response times from continuing train delays at existing grade crossings.

It should be noted that the No Build Alternative was rejected by the ACTA Governing Board as part of the findings that were made pursuant to CEQA. Insofar as the present NEPA process is concerned, the No Build Alternative remains under consideration.

- *The at-grade alternative (Alternative 1.0) was rejected in favor of the depressed alternatives.* Alternative 1.0 was found to have generally more intrusive environmental effects than any of the depressed trainway alternatives and was therefore judged less desirable. The at-grade alternative would:
  - require substantially more right-of-way than the depressed alternatives (1,100 more residential units and 100 more non-residential parcels than any other alternative),
  - subject large numbers of residences to adverse noise effects (850 more residences than the depressed option)
  - require 18,287 meters (60,000 lineal feet) of soundwalls, which could have the adverse effect of creating neighborhood barriers and be subject to graffiti,
  - be more visually intrusive,
  - require corridor traffic to use local streets to reach grade crossing structures, and
  - present greater difficulty for containing spills.
- *The sloped trench alternative (Alternative 2.1S) was rejected (except through the J-Yard portion) due to right-of-way requirements.* This alternative, while potentially saving construction cost, would enlarge the right-of-way needed for the corridor (20 more residential units and 70 more non-residential parcels) than the depressed trainway using vertical walls. The cost and operational advantages were not sufficiently great to warrant

acceptance of this additional impact. The sloped trench configuration is being used in the J-Yard portion of the Corridor, since business or residential relocation would not be required.

- *The Vernon Diversion (Alternative 2.2) was rejected in favor of Alternative 2.1A.* Alternative 2.2 was found to have more adverse effects than Alternative 2.1A. Alternative 2.2 would:

  - have residual adverse noise and vibration effects on a number of residences that would not be affected under Alternative 2.1A (22 additional residences subjected to adverse noise effects and 32 residences subjected to adverse vibration impacts),

  - require the taking of property from a public housing project,

  - require the taking of 32 residential and 18 additional commercial parcels units not required under Alternative 2.1A, and

  - increase noise levels in the vicinity of a school and recreation center which would otherwise not be affected.

- *Alternative 2.1A met the project purpose and need and was the environmentally superior alternative, because it would:*

  - reduce year 2020 delays associated with railroad grade crossings by 15,000 vehicle hours per day,

  - substantially reduce train-to-train conflicts for through trains serving the ports,

  - substantially reduce adverse noise impacts on residents living in proximity to the Union Pacific and Santa Fe lines,

  - produce regional air quality benefits equivalent to any other alternative,

  - substantially reduce delays for emergency vehicles at existing grade crossings along Alameda Street,

  - require the least amount of right-of-way of all build alternatives,

  - result in the least exposure to adverse noise effects and require the least amount of soundwalls,

  - eliminate the need for the use of local streets to reach grade separations,

  - result in no adverse vibration impacts on adjacent properties,

  - eliminate the taking of property from a public housing project, and

  - provide for the least adverse noise effects on schools in the corridor.

As part of the final debate concerning the project, it was also agreed that every effort should be made to minimize right-of-way required for the project and as a result, a modification was made to the project during the adoption process. Instead of providing six lanes of traffic along Alameda Street, it was decided that the current number of lanes (four lanes on main Alameda plus two lanes of frontage road in some portions of the corridor), together with ancillary improvements (e.g. improved signalization, left turn pockets) would be provided at all existing crossings except Auto Drive South. This then became the locally preferred alternative, and is referred to as Alternative 2.1B. This additional project modification would:

- reduce right-of-way requirements to an absolute minimum by confining full property takings to the north and south ends of the corridor where industrial and railroad parcels would principally be involved, and

- the respective interests of the local jurisdictions located along the corridor could be maintained with a minimum of disruption.

The California environmental clearance process was completed by the ACTA Governing Board in January 1993, by: (1) certification of the Final EIR, (2) adoption of the "locally preferred" project, (3) adoption of Findings and Statement of Overriding Considerations, (4) adoption of a Mitigation Monitoring Program and (5) filing of a Notice of Determination reflecting the above actions.

2.6 PROPOSED PROJECT: ALTERNATIVE 2.1B (DEPRESSED TRAINWAY WITH RECONSTRUCTION OF EXISTING ALAMEDA STREET)

For the purpose of understanding the various design components that comprise the Alameda Corridor project, the following legend is provided:

Street Overpass of Depressed Trainway: The short roadway bridge constructed over the below grade (depressed) trainway. The bridge will carry vehicles and pedestrians across the trench at the various city streets where a crossing is provided.

Railroad Grade Separation (railroad bridge over trench): The short railroad bridge constructed over the below grade (depressed) trainway. The bridge may carry a branch line or industry lead railroad track over and past the trench.

Street Grade Separation: A relatively long roadway crossing either over or under the Corridor and other tracks. The structure will carry vehicles and pedestrians past the track areas. In the case of the Pacific Coast Highway (US 1) crossing, this shall have the same meaning as being an "underpass" or "overhead" structure in accordance with Caltrans standards.

Trainway in Tunnel Section: A crossing of the Corridor, where the trench structure is covered (i.e., crossing of a street, where the crossing is too long to be considered a bridge). Either tunnel sections or street overpass will be constructed, depending on the detailed design.

Railroad/Highway Grade Separation: A crossing of railroad tracks, usually the Corridor over a highway or city street. In the case of the Corridor passing over the Terminal Island ramps (SR 47), this shall have the same meaning as an "underpass" structure in accordance with Caltrans standards.

The locally preferred alternative for the Alameda Corridor project, Alternative 2.1B, consists of a depressed trainway providing for two main line consolidated freight rail tracks, together with an at-grade drill track to provide for local industrial service. Accompanying the depressed trainway would be a reconstructed Alameda Street, generally in its present configuration.

Currently, Alameda Street exists as four lanes of two-way flow on the west side of the corridor, to which the project would add left turn pockets at designated intersections; and a discontinuous two-lane frontage road on the east side of the corridor, which would remain as such. Allowing passage across the depressed trainway would be east-west at-grade street overpasses (configured to match existing street geometry on either side of the corridor) at designated streets. The project would also provide intersection signalization improvements.

Alternative 2.1B is illustrated in Figure 2-8, and described below. For purposes of impact descriptions in the EIS, the Corridor has been divided into four major segments. The following project description is organized according to those segments.

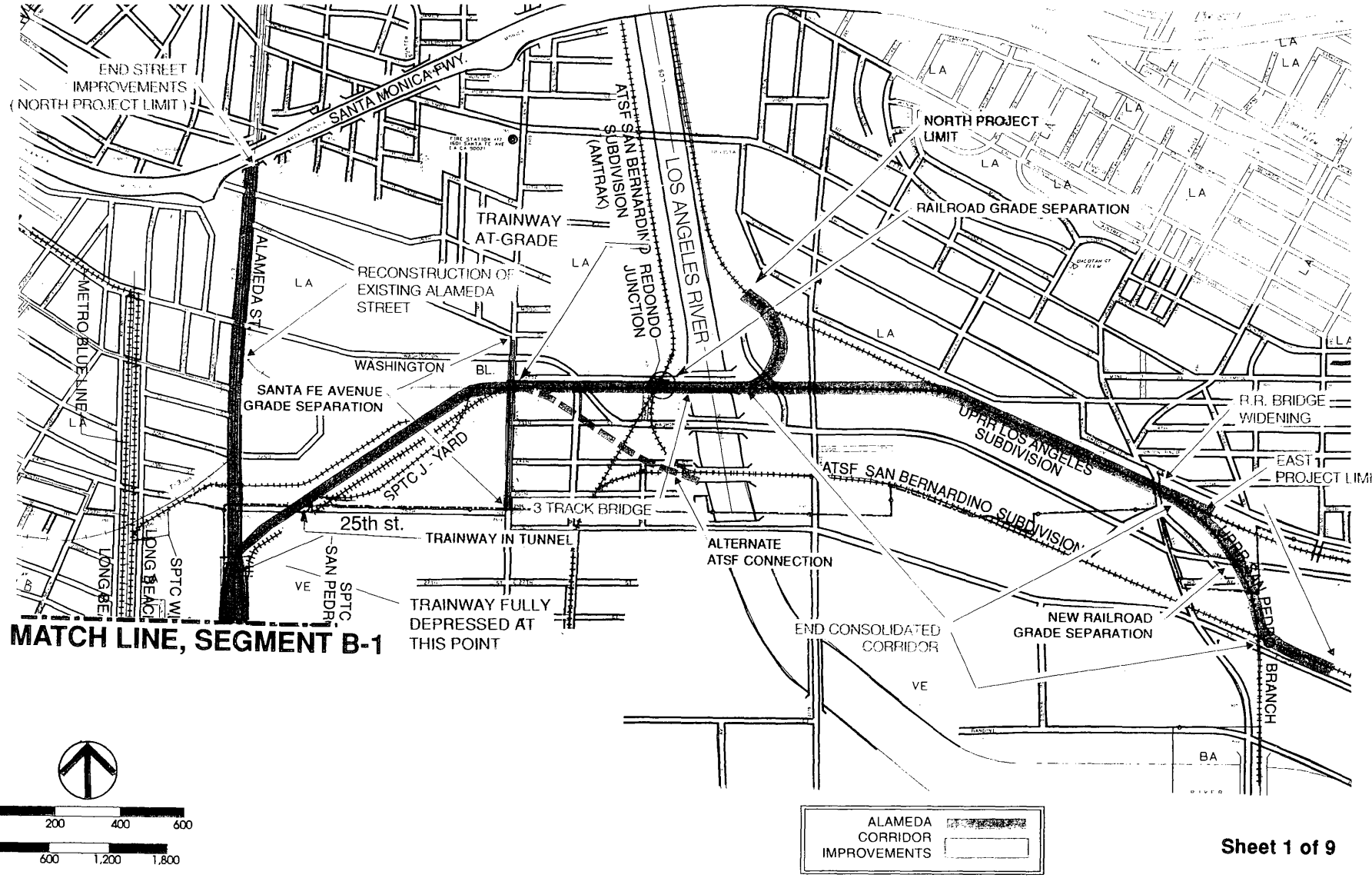
Segment A (Pasadena Junction to 25th Street)

Sheet 1 of Figure 2-8 illustrates the project configuration in Segment A. The project has two northern limits and two eastern limits. For railroad improvements the northern limit is east of the Los Angeles River and north of Washington Boulevard, at the 9th Street Junction. One eastern railroad limit is the Union Pacific's East L.A. Yard, east of Soto Street. The second eastern limit is the ATSF Hobart Yard, north of 26th Street and east of Grande Vista Avenue. The project's northern limit for street improvements is the I-10 freeway.

At a point east of the Los Angeles River and north of the Washington Boulevard (9th Street Junction), a railroad connection would be made to permit trains destined to the north and east on SP main lines to move out of the downtown area of Los Angeles. From this point, the track would make a turn to the west and cross the Los Angeles River on a new three-track bridge. Also at this location, the Corridor tracks would proceed to the east to the UPRR east L.A. Yard, where a connection would be made to the UPRR main tracks. Just before this point of connection, another leg of the Corridor would turn to the southeast and proceed to the ATSF Hobart Yard, where a connection would be made with the ATSF main tracks. An alternative connection between the Corridor and the ATSF main tracks which is also under consideration would consist of track leaving the Corridor just east of Santa Fe Avenue and proceeding southeasterly to the west side of the Los Angeles River, where a connection to the ATSF main line would be made.

At Redondo Junction (west of the Los Angeles River and north of Washington Boulevard), a grade separation would be provided between the corridor tracks (located at grade) and the Burlington Northern Santa Fe Corporation (BNSF) main line tracks, which would continue to carry Amtrak service on a new bridge structure.

From Redondo Junction, the corridor tracks would proceed west, cross over Washington Boulevard (a new underpass at Washington Boulevard would be provided) and would continue west beneath Santa Fe Avenue (a new overpass at Santa Fe Avenue would be provided).



Sheet 1 of 9

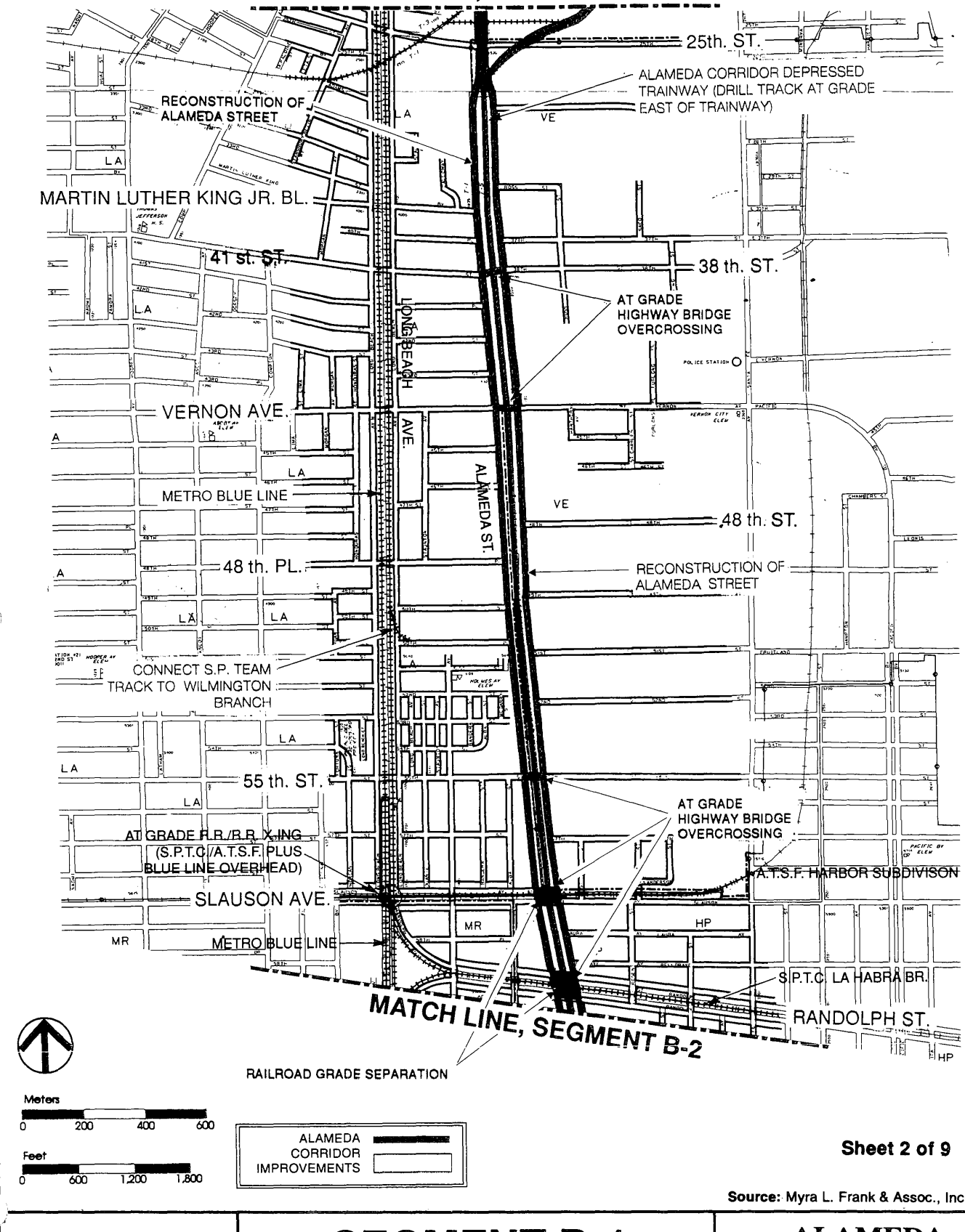
Source: Myra L. Frank & Assoc., Inc., 1994

Fig. No. 2 - 8

SEGMENT A

Alternative 2.1B

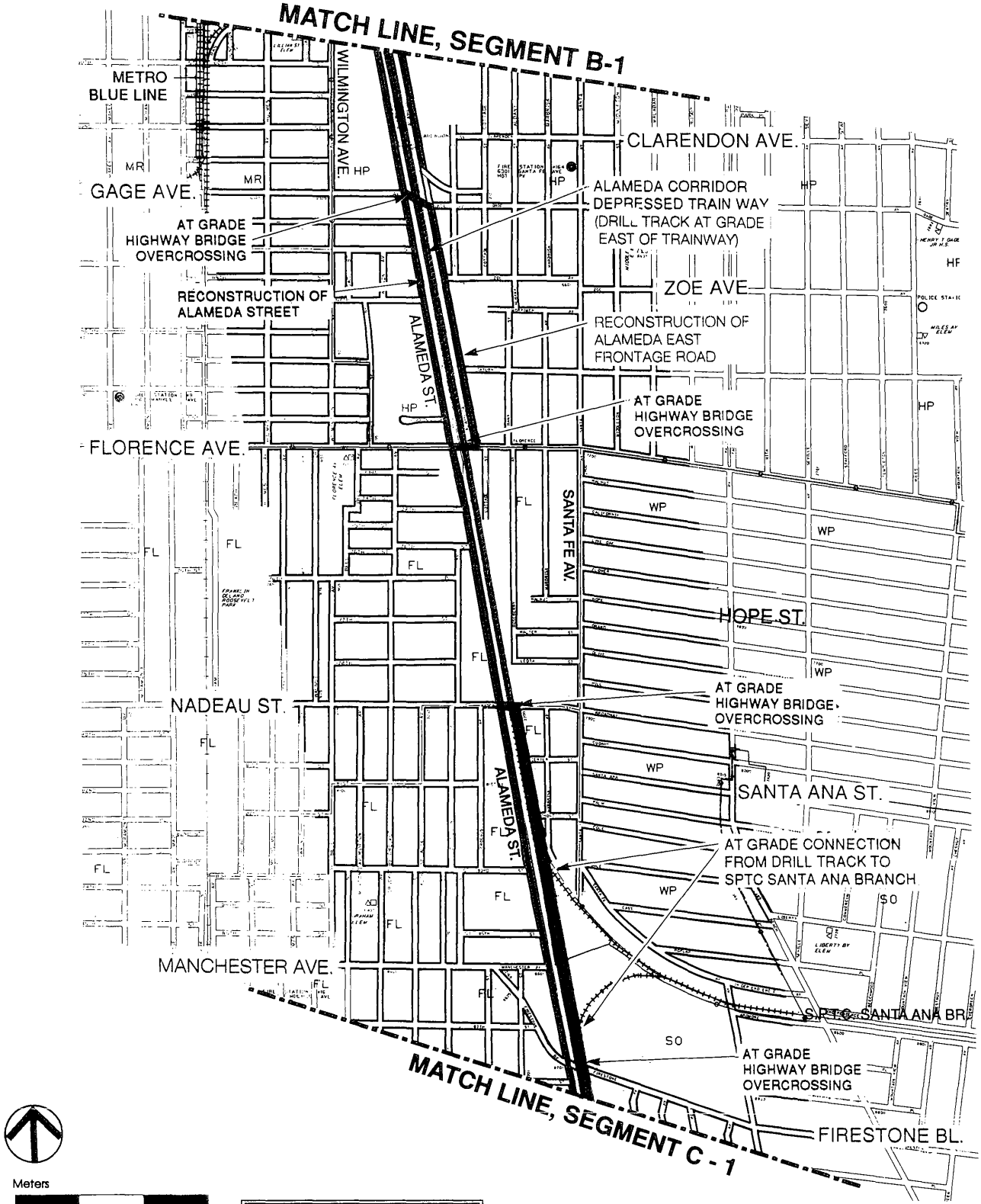
ALAMEDA CORRIDOR E.I.S.



Sheet 2 of 9

Source: Myra L. Frank & Assoc., Inc., 1994

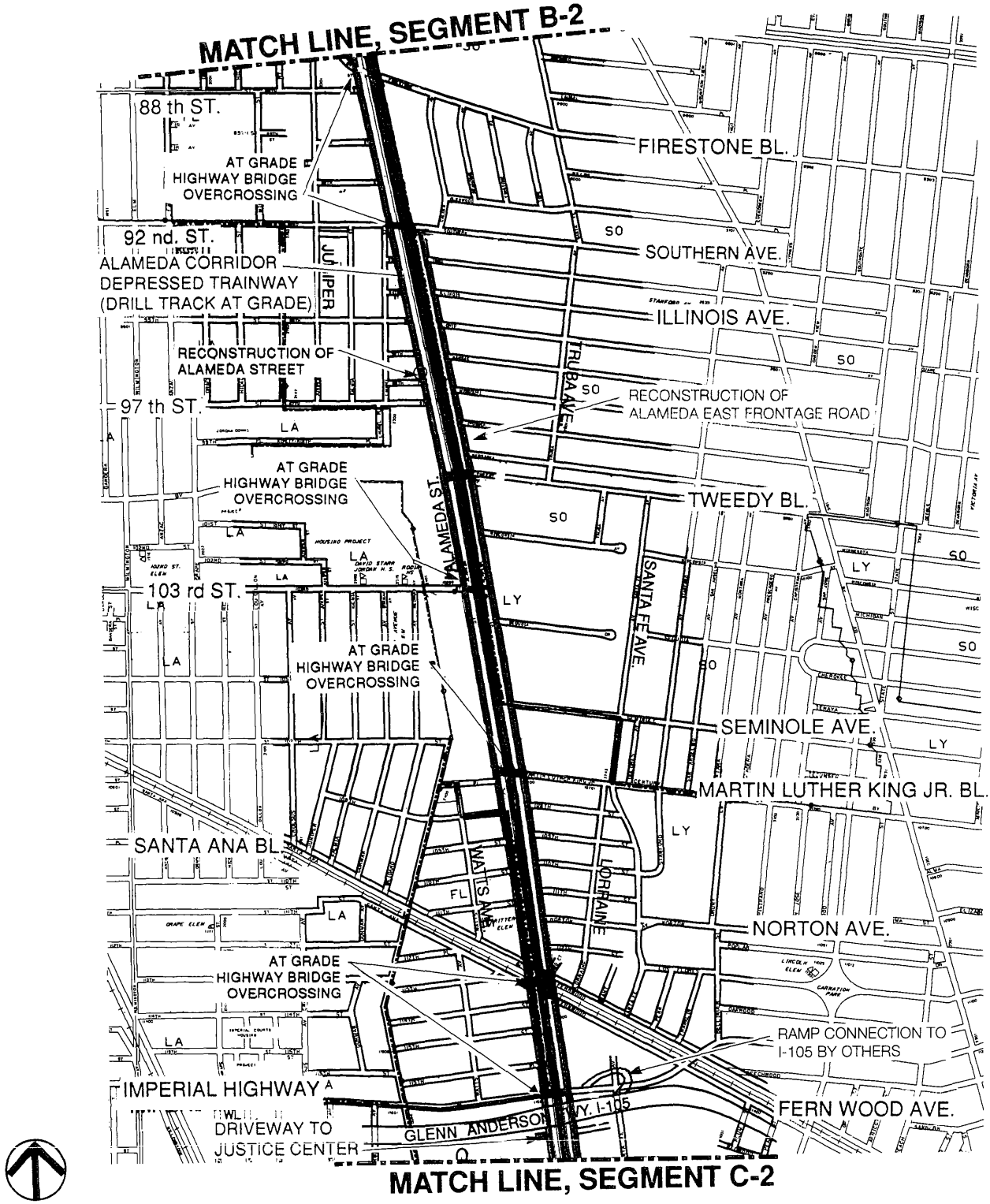
Fig. No. 2 - 8	**SEGMENT B-1** **Alternative 2.1 B**	**ALAMEDA CORRIDOR E.I.S.**



Sheet 3 of 9

Source: Myra L. Frank & Assoc., Inc., 1994

Fig. No. 2 - 8	**SEGMENT B-2** **Alternative 2.1 B**	**ALAMEDA CORRIDOR E.I.S.**



Meters
0 200 400 600

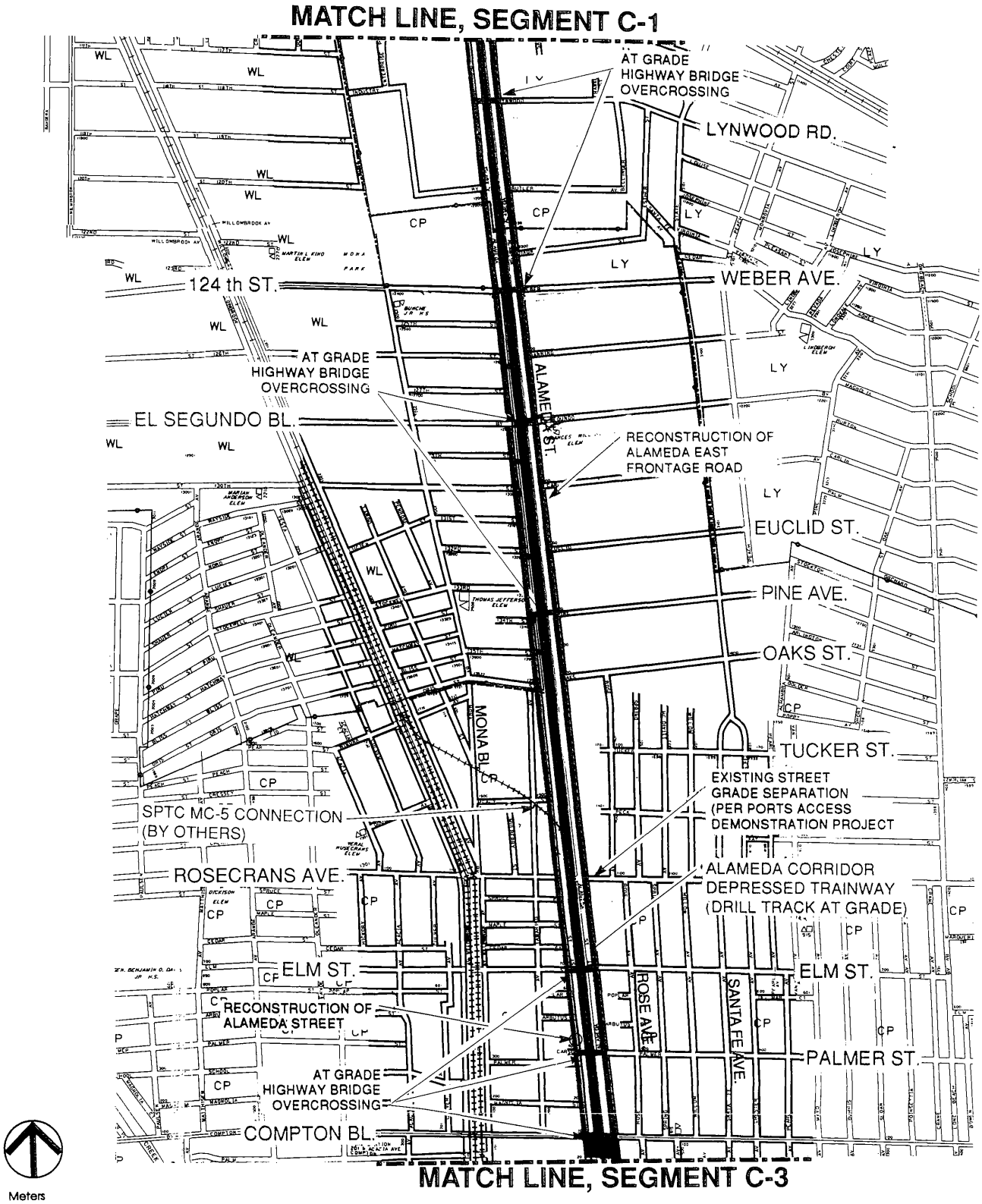
Feet
0 600 1,200 1,800

ALAMEDA CORRIDOR IMPROVEMENTS

Sheet 4 of 9

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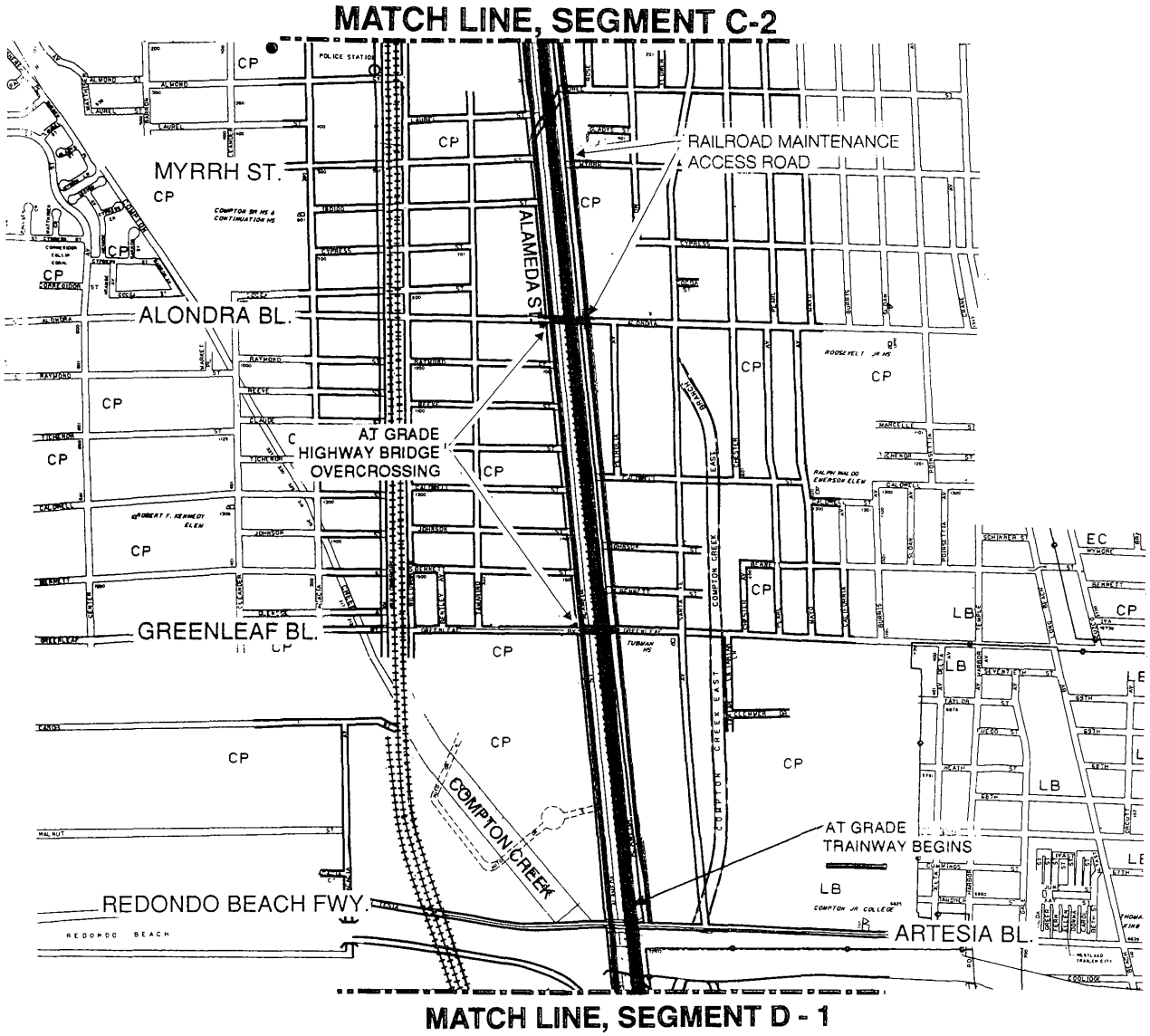
Fig. No. 2 - 8	**SEGMENT C-1** **Alternative 2.1 B**	**ALAMEDA CORRIDOR E.I.S.**



Sheet 5 of 9

Source: Myra L. Frank & Assoc., Inc., 1994

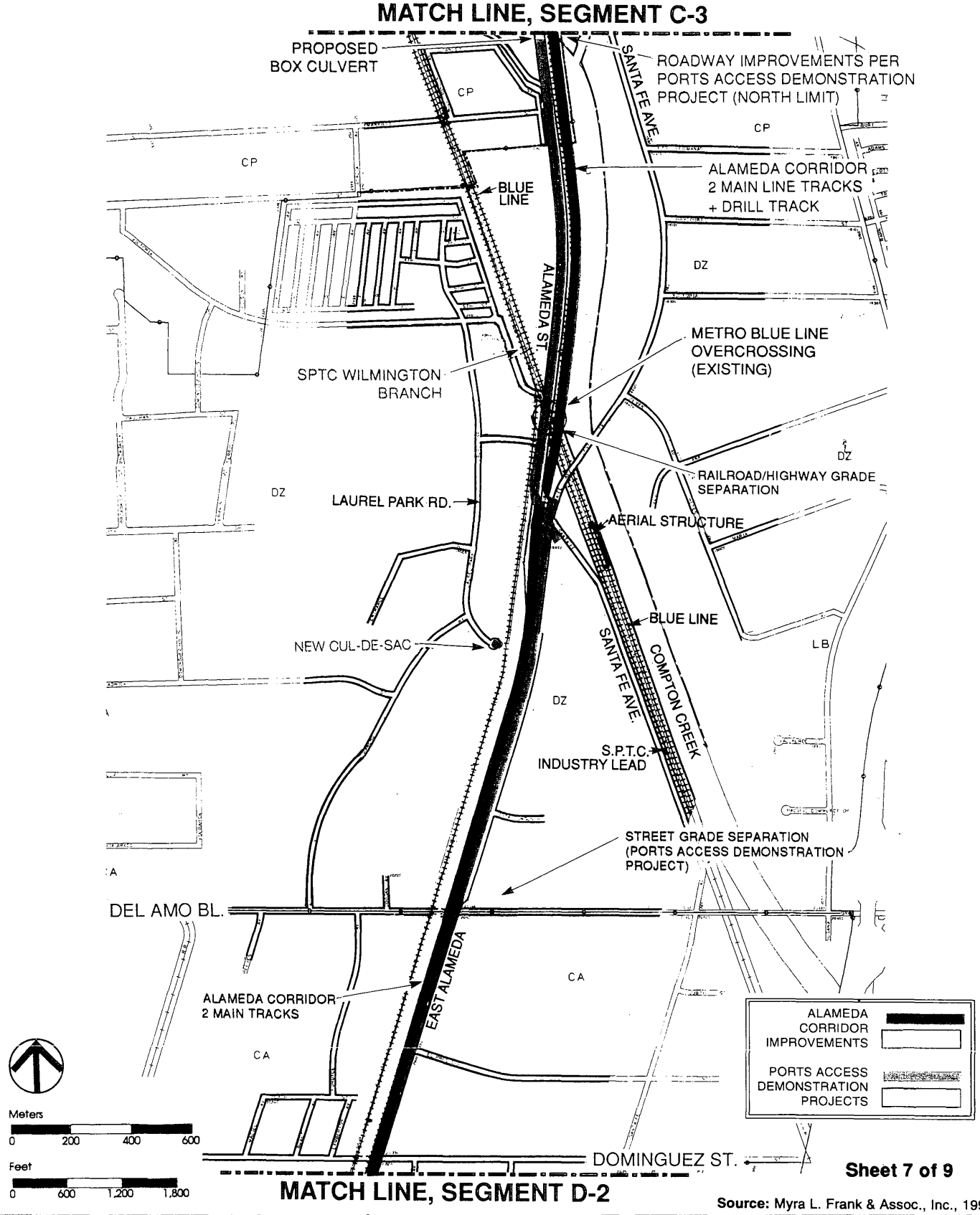
Fig. No. 2 - 8	**SEGMENT C-2** **Alternative 2.1 B**	**ALAMEDA CORRIDOR E.I.S.**



Sheet 6 of 9

Source: Myra L. Frank & Assoc., Inc., 1994

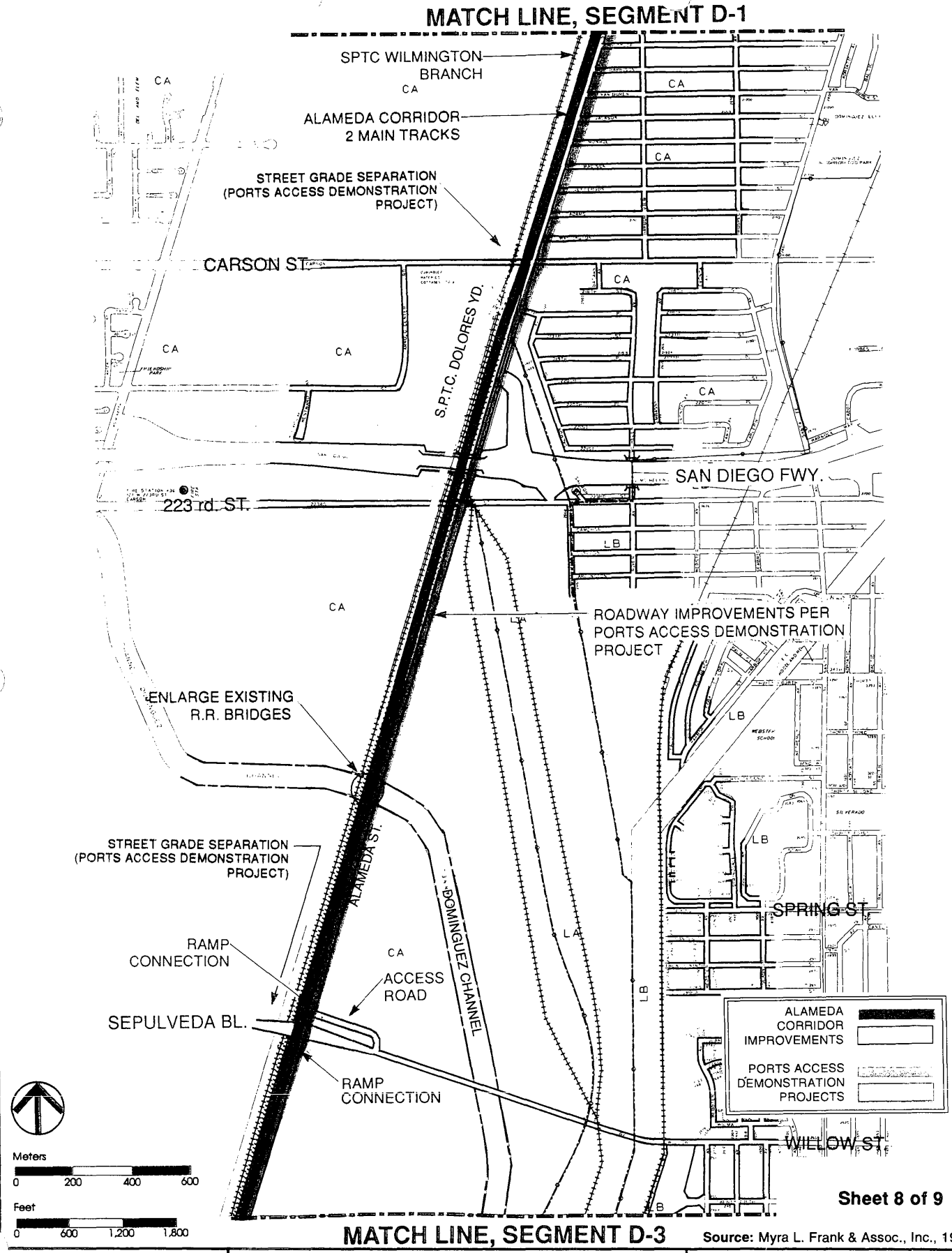
Fig. No. 2 - 8	**SEGMENT C-3** **Alternative 2.1 B**	**ALAMEDA CORRIDOR E.I.S.**



Sheet 7 of 9

Source: Myra L. Frank & Assoc., Inc., 1994

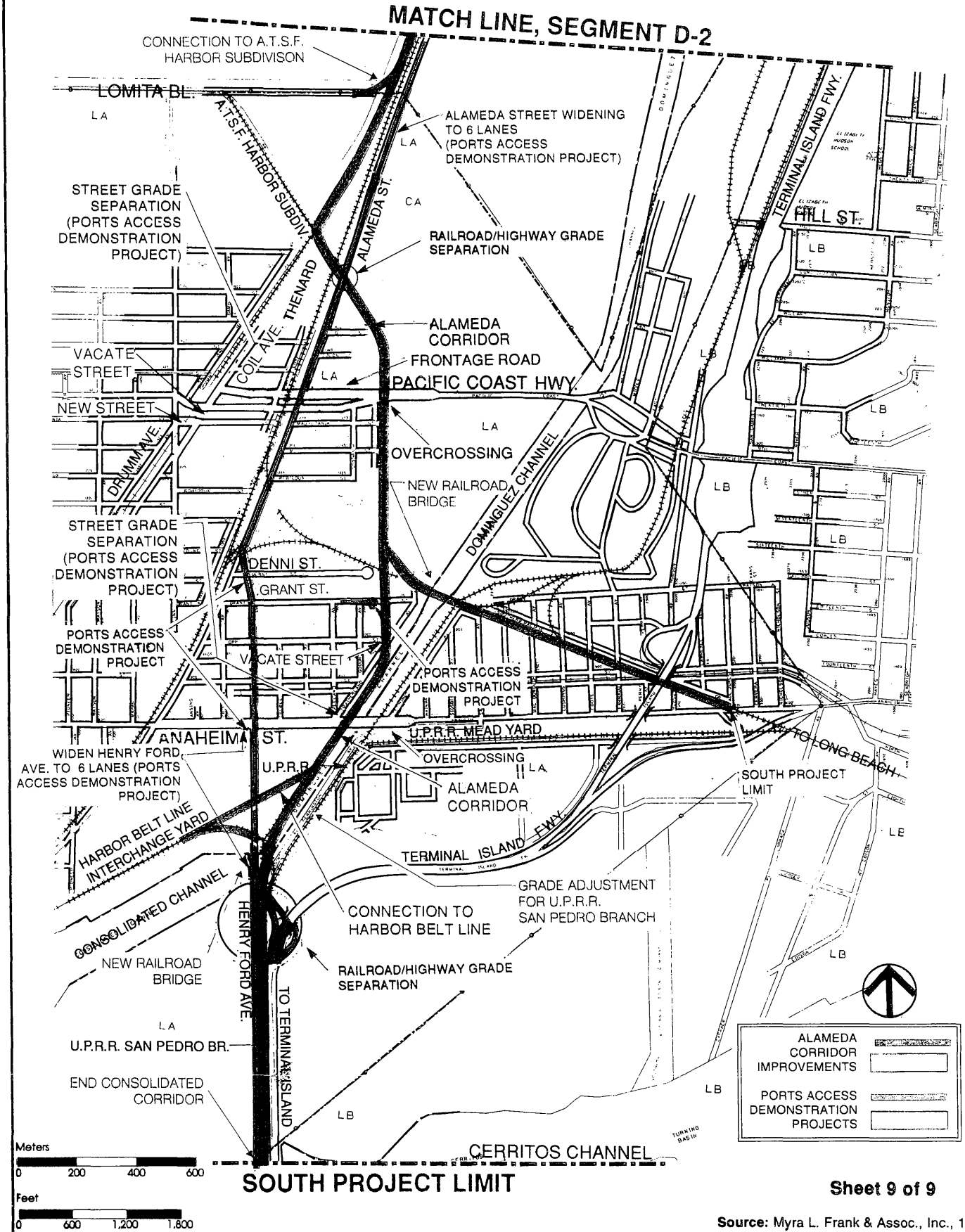
Fig. No. 2 - 8	**SEGMENT D-1** **Alternative 2.1 B**	**ALAMEDA CORRIDOR E.I.S.**



Sheet 8 of 9

Source: Myra L. Frank & Assoc., Inc., 1994

Fig. No. 2 - 8	**SEGMENT D-2** **Alternative 2.1 B**	**ALAMEDA CORRIDOR E.I.S.**



Sheet 9 of 9

Source: Myra L. Frank & Assoc., Inc., 1994

Fig. No. 2 - 8	**SEGMENT D-3** **Alternative 2.1 B**	**ALAMEDA CORRIDOR E.I.S.**

Beyond Santa Fe Avenue, the corridor tracks would turn to the southwest into the SP "J" Yard and proceed southwest to the vicinity of 25th Street. At the north end of "J" Yard, the trainway would begin a descent at a one percent grade, reaching its final below grade elevation just beyond 25th Street. 25th Street would be reconstructed as an at-grade street overpass above the depressed trainway along its present alignment.

The corridor also has an east leg in this segment, which is located between the east bank line and the UP East L.A. Yard. This east leg would provide railroad connections between the corridor tracks (crossing easterly over the Los Angeles River) and a) the UP Los Angeles Subdivision, as well as b) the UP San Pedro Branch, enabling Union Pacific trains leaving the corridor to reach the UP San Bernardino Subdivision main line tracks to the east. A new connection would be provided between the UPRR Los Angeles Subdivision and the ATSF San Bernardino Subdivision along the UPRR San Pedro Branch. This connection would include new one-track railroad overpasses over Grande Vista Avenue and Washington Boulevard.

In addition to the reconstruction of existing Alameda Street, roadway improvements in Segment A include overcrossings of Santa Fe Avenue at Washington Boulevard and reconstruction of 25th Street as an at-grade street overpass above the depressed trainway.

Segment B (25th Street to Firestone Boulevard)

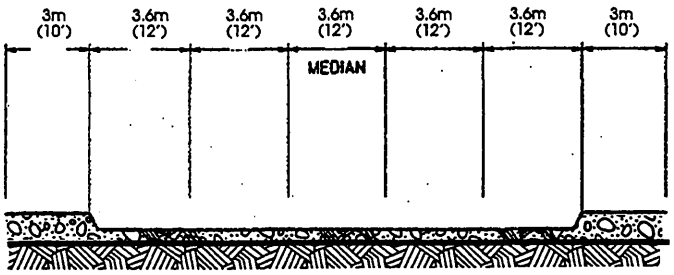
Beginning at 25th Street, the corridor would be configured as a depressed trainway providing two main line tracks in the center of Alameda Street. Flanking the trainway would be four lanes of two-way traffic along West Alameda and two lanes of two-way traffic along East Alameda. East Alameda would continue to function as a frontage road. Between the trainway and East Alameda would be an at-grade drill track to serve local industries. This configuration would be maintained throughout this segment. See Figure 2-9 for typical cross sections.

As shown on Sheets 2 and 3 of Figure 2-8, east/west at-grade street crossings would be provided over the depressed trainway in this segment at 41st/38th Street, Vernon Avenue, 55th Street, Slauson Avenue, Randolph Street, Gage Avenue, Florence Avenue, Nadeau Street and Firestone Boulevard. Left turn pockets would be provided from Alameda to these cross streets. At Slauson Avenue, the existing ATSF Harbor Subdivision would cross over the depressed trainway in an east-west direction along a new one track bridge, and at Randolph Street, the existing SP La Habra Branch would cross over the depressed trainway in an east-west direction along the center of Randolph Street on a new one track bridge. A new connection between the existing SP Wilmington Branch and Team Track would be provided just to the north of 55th Street.

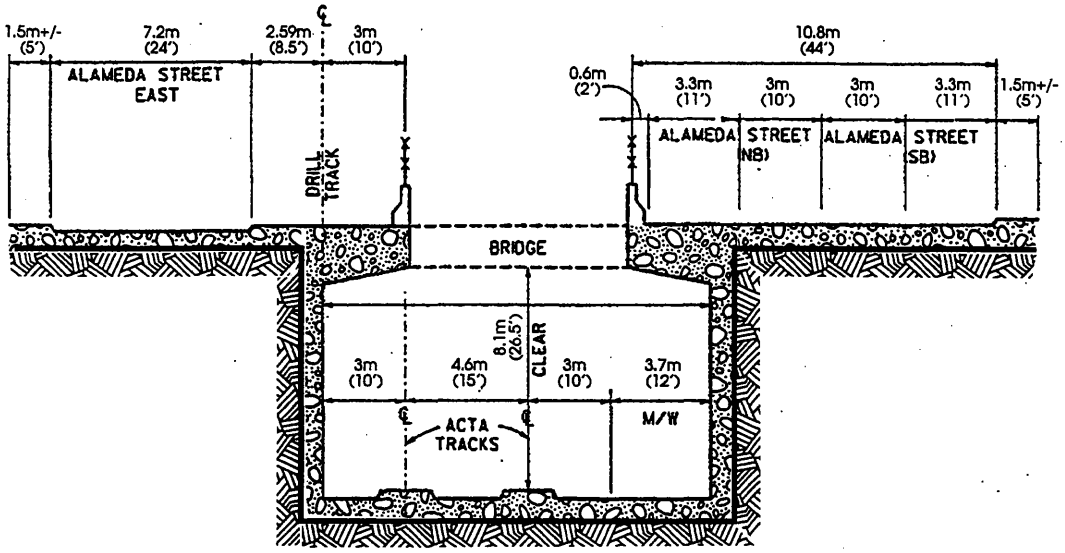
Segment C (Firestone Boulevard to State Route 91)

Beginning in the vicinity of Firestone Boulevard, the corridor would be configured as it is in the previous segment. In the vicinity of Greenleaf Boulevard, the depressed trainway would begin an ascent, returning to grade at SR 91. A maintenance access road would also be provided in this segment. See sheets 4 through 6 of Figure 2-8.

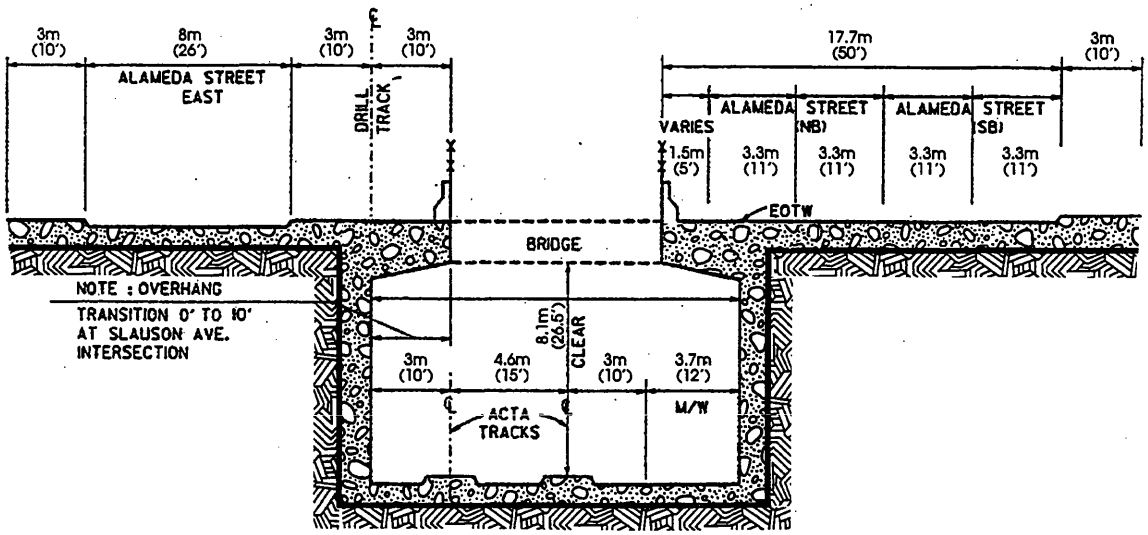
In Segment C, at-grade street overpasses of the depressed trainway would be provided at: Southern Avenue, Tweedy Boulevard, 103rd Street, Martin Luther King Jr. Boulevard, Santa Ana Boulevard/Fernwood Avenue, Imperial Highway, Lynwood Road, Weber Avenue, El Segundo Boulevard, Pine Avenue, Elm Street, Palmer Street, Compton Boulevard, Alondra Boulevard and Greenleaf Boulevard. Left turn pockets would be provided from Alameda to these cross streets.



TYPICAL SECTION
ALAMEDA STREET
EB I-10 RAMPS TO 22nd STREET



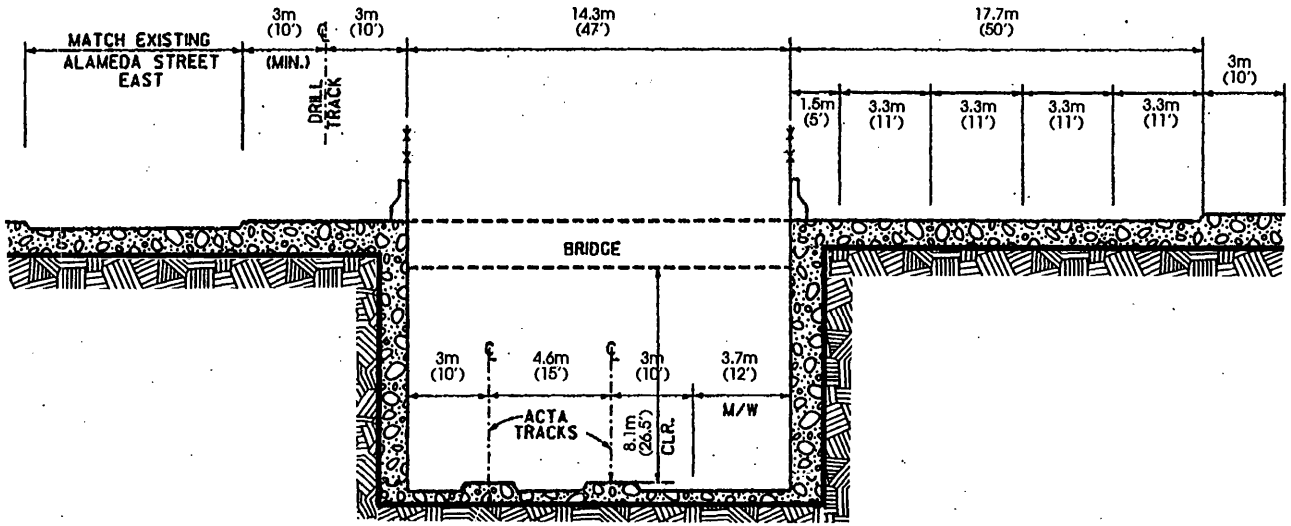
TYPICAL SECTION 25Th. STREET TO VERNON AVENUE



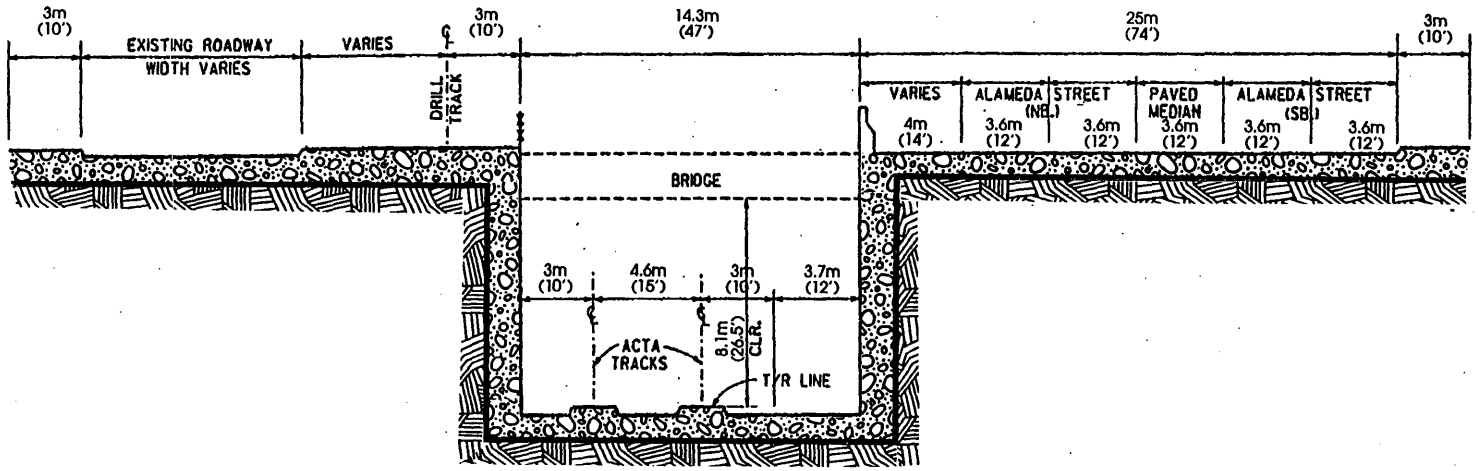
TYPICAL SECTION VERNON AVE. TO SLAUSON AVE.

Sheet 1 of 2

FIGURE 2-9	Typical Sections	Alameda Corridor EIS



TYPICAL SECTION RANDOLPH STREET TO FLORENCE AVENUE



TYPICAL SECTION FLORANCE AVENUE TO GREENLEAF BOULEVARD

Sheet 2 of 2

FIGURE 2-9	Typical Sections	Alameda Corridor EIS

Segment D (State Route 91 to Cerritos Channel)

Beginning in the vicinity of SR 91, the corridor would be configured as an at-grade trainway east of the Alameda roadway. This configuration would continue to just south of the Metro Blue Line street overpass, in the vicinity of Santa Fe Avenue, where the vehicular travel lanes would cross beneath a grade separation within the corridor from the west side of the tracks to the east side. Once this transition has been completed, the corridor rail tracks would be located to the west of the roadway section of Alameda. South of SR 91, Ports Demonstration roadway projects begin which are not considered part of the Alameda Corridor project. See sheets 7, 8 and 9 of Figure 2-8.

A box culvert would need to be constructed just to the south of SR 91 to permit the Compton Creek to pass beneath the corridor.

Existing Laurel Park Road (west of Alameda and north of Del Amo Boulevard) would be converted to a cul-de-sac street. An alternative means of access may be provided to connect with Alameda Street. See sheet 8 of Figure 2-8.

At Carson Street, the corridor tracks would deviate slightly to the west to enter the Dolores Yard area, within which the corridor trackage would be located on the westernmost tracks in that yard. Also to be provided would be three 2,438.4-meter (8,000-foot) long storage/staging tracks, which would be parallel to the corridor tracks. Leaving the Dolores Yard area, the corridor tracks would curve back to assume an alignment following Alameda Street, crossing beneath I-405 and 223rd Street/Wardlow Road. The corridor tracks would continue south, crossing the Dominguez Channel on existing bridge structures that would be expanded to accommodate the project.

Just north of Lomita Boulevard, a new railroad connection to the ATSF Harbor Subdivision would be constructed. South of Lomita Boulevard, the tracks would swing wide to the west and make a curve to the southeast to assume an alignment along the ATSF Harbor Subdivision. The tracks would be at grade with Alameda Street, passing beneath on a new grade separation.

The corridor would continue in a southeasterly direction along the ATSF alignment, turn to the south and pass beneath Pacific Coast Highway (SR 1), which would be reconstructed as a new grade separation as part of the Ports Access Demonstration Projects.

From Pacific Coast Highway, the corridor would continue south, and at a point opposite Grant Street (which would become a cul-de-sac), the corridor would provide a connection with the SP Long Beach Branch, permitting southeast rail movement to and from the Port of Long Beach. This connection would extend to the existing SP 8th Street Yard in Long Beach, which is located west of the Los Angeles River.

The corridor tracks would continue due south from the vicinity of Denni Street in a new right-of-way following the alignment of present Leeds Avenue (which would be vacated), to reach the west bank of the Dominguez Channel, at which point the corridor tracks would follow the alignment of the channel.

The existing vehicular bridge crossing at Anaheim Street over the Dominguez Channel would be reconstructed to provide six lanes of traffic as a Ports Access Demonstration Project. The corridor would continue until Henry Ford Avenue, where it would make a turn to the south to follow that street. A new interchange would be constructed between Henry Ford Avenue and the Terminal Island Freeway (SR 103/47). The corridor would continue south until reaching the north side of the Badger Avenue Bridge at the Cerritos Channel, which is the southern project limit and the point at which the corridor improvements would end. Improvements to the Badger Avenue Bridge and rail improvements on Terminal Island are being examined as a separate project by the Port of Los Angeles.

2.7 SUMMARY OF CHANGES MADE TO EIR ALTERNATIVE 2.1A TO CREATE THE LOCALLY PREFERRED ALTERNATIVE 2.1B

As described above in Section 2.5, in order to minimize right-of-way required for the project, Alternative 2.1B includes reconstruction of Alameda Street generally in its current configuration (four lanes on one side of the trackage plus two frontage lanes in some locations) rather than increasing the number of lanes to six and reconfiguring Alameda Street as a one-way couplet straddling the trackage. The modified Alternative 2.1A is referred to as Alternative 2.1B or the preferred alternative.

With the exception of Auto Drive South (which would require a costly and geometrically undesirable overpass structure), all existing street crossings of the consolidated rail tracks along Alameda Street would be provided with a new grade separation to improve traffic and air quality conditions in the corridor. In addition to those included in Alternative 2.1A, grade separations (at-grade crossings over the depressed trainway) would be provided under Alternative 2.1B at: 55th Street, Randolph Street, Santa Ana Boulevard, Lynwood Road, Weber Avenue, Pine Avenue, Elm Street and Palmer Street.

Other modifications included in the preferred alternative include:

- 25th Street would not be realigned, but it would cross over the depressed railroad at its current location;
- The location of one of the railroad maintenance access roads in Segment C would be located between Myrhh Street and Alondra Boulevard rather than from Oaks Street to Tucker Street;
- A new connection to Alameda Street will be provided in the vicinity of the Laurel Park Road cul-de-sac. Alternative designs are being examined;
- The proposed Alameda Street connection to Santa Fe Avenue south of SR 91 will be modified to a simpler at-grade intersection; and
- Additional trackage and track connections are proposed between Dominguez Junction and Sepulveda Boulevard.
- Modification of the previously designed interchange of Henry Ford Avenue at the Terminal Island Freeway.

In addition to left turn pockets provided under Alternative 2.1A, Alternative 2.1B includes left turn pockets at 38th/41st Street, Vernon Avenue, 55th Street, Slauson Avenue (southbound), Randolph Street, Lynwood Road and Palmer Avenue.

The Ports Access Demonstration Projects are considered part of the No Build Alternative, although they would contribute to the overall functioning of the Alameda Corridor. These projects are being pursued independently, they each have independent utility and each will undergo separate environmental review. These projects include: Alameda roadway improvements from SR-91 to Del Amo Boulevard; Sepulveda Boulevard overcrossing and associated access road; Pacific Coast Highway overcrossing and associated roadway modifications; Anaheim Street overcrossing; provision of new railroad bridge crossings over the Dominguez Channel between Pacific Coast Highway and Anaheim Street and south of Anaheim Street. See Section 2.10 for further discussion of Ports Access Demonstration Projects.

2.8 CURRENT PROJECT STATUS

Subsequent to the actions taken by the ACTA Governing Board in January, 1993, it was determined that federal funding should be pursued for the project. Pursuant to that objective and the National Environmental Policy Act (NEPA), this Environmental Impact Statement has been prepared. The Federal Highway Administration (FHWA) and the Federal Railroad Administration (FRA) are serving as joint lead agencies in that process.

A goal has been established to begin construction by 1995 and have the corridor completely operational by the year 2000.

Funding for the project, which has an estimated total cost of $1.8 billion, would come from a variety of sources. Over one-half (55 percent) of the required funds would come from local sources, including the Ports of Los Angeles and Long Beach, the Los Angeles County Metropolitan Transportation Authority and revenue bonds to be retired by fees charged to users of the corridor. State sources would account for 4 percent of the required funding. Federal contributions would provide the remainder. As of the present, approximately 27 percent of the required funds have been committed.

2.9 CONSTRUCTION SEQUENCE AND METHODS

This section provides a summary description of the construction process associated with implementing Alternative 2.1B. For a more detailed discussion of construction sequencing and methods, see Section 3.6 of the EIR.

2.9.1 Construction Sequence

Two phases of construction are suggested for Alternative 2.1B. In the first phase, corridor improvements would begin at the southernmost portion of the corridor and proceed northerly to the vicinity of El Segundo Boulevard. Activities would include construction of new interchanges, bridge reconstructions, grade separations and roadway and trainway sections from the project's southern boundary north to El Segundo Boulevard (segment D and part of segment C).

The second phase of construction would proceed from El Segundo Boulevard northerly (segments C, B and A). For this phase, the corridor would be broken up into sections and a series of construction activities would occur in each section to first improve Alameda and construct the railroad drill track and then construct the depressed trainway.

A detailed phasing plan will be developed during the preliminary engineering phase.

2.9.2 Construction Methods

The major steps in construction would be similar for most project components and most locations along the corridor. They would be as follows:

1. Relocation of utilities
2. Installation of safety fencing
3. Clearing right-of-way
4. Detouring traffic
5. Removing street improvements
6. Excavating cut sections
7. Constructing subsurface facilities
8. Constructing embankments
9. Installation of piles for foundations
10. Constructing footings
11. Constructing above ground structures
12. Constructing retaining and railroad walls
13. Restoring street improvements
14. Installation of signage, pavement marking and lighting
15. Installation of signals
16. Construction of railroad track and related facilities
17. Construction of soundwalls
18. Installation of landscaping

The precise sequence of construction tasks and the length of time required to complete each of them would vary somewhat, depending on the particular task and location. The total length of time to accomplish these tasks would be influenced in part by the area in which the construction would be taking place.

For Alternative 2.1B, the construction time in any one location north of the Artesia Freeway is anticipated to be as long as three to four years, due to the construction steps needed to complete a depressed trainway. In order to accommodate vehicular traffic along and across the corridor, as well as enable the railroads to continue to function during construction, complex construction staging at the major cross streets would be required, thus increasing the duration of the construction period. Trains would not be able to use the trench until the entire corridor was completed north of the Artesia Freeway.

One aspect of the depressed trainway construction that could have an important bearing on the ease or difficulty of the construction process is the manner in which excavated material would be removed from the area. One approach that has been discussed would use rail cars which would transport the excavated material south to the ports for use as landfill. The other more

common option would be to remove the material by truck. As the beginning of construction nears, specific disposal sites and truck routes for hauling dirt will be determined.

See Section 3.6.2 of the EIR for a more detailed discussion of each of the construction steps, including the types of equipment used and activities involved.

2.10 RELATED PROJECTS

A number of projects are planned or currently being implemented that could be considered related to the Alameda Corridor project. This section updates the status of the Port of Los Angeles and Port of Long Beach master plans and Ports Access Demonstration projects. See Section 3.8 of the EIR for a discussion of local, smaller scale projects planned in the area.

2.10.1 Ports Master Plans

A Final Environmental Impact Statement/Environmental Impact Report for the Port of Los Angeles' plan to accommodate projected increased cargo throughput and the relocation of hazardous and other facilities at the Port was completed by the USACOE and the Port of Los Angeles/Los Angeles Harbor Department in September 1992. The plan includes the dredging of navigation channels and turning basins in Los Angeles Harbor and the creation of about 235.5 hectares (582 acres) of new landfill to support new terminals and associated handling and storage facilities. The plan provides for four increments of phased construction so that facilities will be developed over time as needed.

The Port of Long Beach has prepared a Facilities Master Plan that reviews current forecasts of future cargo movements through the Port, and based on those forecasts, explores different strategies to accommodate cargo handling needs through the year 2020. The alternative strategies provide different levels of capacity expansion, consistent with the range of forecast future cargo movements. For the low end of the forecasts, minimum landfill [20.2 hectares (50 acres)] would be developed, measures to increase efficiency of existing facilities would be implemented and/or privately owned land would be acquired and redeveloped by the Port. To accommodate the high end of the forecast, alternatives with new landfill of up to 344.0 hectares (850 acres) are considered. The Plan recommends the completion of capacity expansion/improvement projects already approved or in advanced planning stages and the implementation of strategies identified to meet the low end of the forecasts and continue planning for additional potential capacity expansion measures.

2.10.2 Ports Access Demonstration Projects

As a result of past efforts, a number of projects to improve access to and within the ports have been identified and are in various stages of implementation. These projects are assumed to be in place for purposes of the Alameda Corridor project, and are therefore also part of the No Build Alternative. The Ports Access Demonstration Projects include street widenings, repaving, intersection and interchange improvements, bridge improvements and grade separations as described on Tables 2-3, 2-4 and 2-5. These tables also provide the current status of each of the projects.

TABLE 2-3
PORTS ACCESS DEMONSTRATION PROJECTS - PHASE I

PROJ. NO.	STATE RT. #	LOCATION	IMPROVEMENT	STATUS
PORT AND CITY OF LONG BEACH				
1	N/A	Anaheim Street ("I" Street to Harbor Scenic Drive)	A.C. overlay, restripe 4 lanes, median, parking lane	Completed
5	710	Ocean Boulevard (T.I. Fwy. to Gerald Desmond Bridge)	A.C. overlay, 6 lanes, median, signalize Gate 3	Construction targeted to begin August 1995
6	710	Gerald Desmond Bridge	Operational improvements	In planning
7	710	Ocean Boulevard (Gerald Desmond Bridge to Ocean Boulevard/ Harbor Scenic Drive interchange)	A.C. overlay, 6 lanes, median	Completed
9	47	Ocean Boulevard (City limits to T.I. Freeway)	Const. 6 lanes, median, signalize Gate 1, Henry Ford, Rt. 47	Construction targeted to begin August 1995
12	710	Ocean Blvd./ Harbor Scenic Drive interchange	Const 2 lanes E/B to N/B and S/B to W/B	Completed
13	710	Harbor Scenic Drive (Ocean Blvd. to PCH)	Realign, repave, and upgrade	Completed
PORT AND CITY OF LOS ANGELES				
2	N/A	"I" Street (T.I. Freeway to Anaheim Street)	Reconstruct 4 lanes	Completed
3a	47	Intersection of Henry Ford Avenue and Anaheim Street	Construct 6 lanes, signalize	Completed
3b	47	Alameda Street (PCH to Henry Ford Avenue)	Construct 6 lanes, R.R. work, signalization	In design
3c	47	Henry Ford Avenue (Alameda Street to Anaheim Street)	Construct 6 lanes, R.R. work, signalization	In design
3d	47	Henry Ford Avenue (Anaheim Street to T.I. Freeway)	Construct 6 lanes, R.R. work, signalization	In design
3e	47	Alameda Street (PCH to Lomita Boulevard)	Construct 6 lanes, R.R. work, signalization	In design
8	47	Seaside Avenue (Toll Plaza to city limits)	Construct 6 lanes, median, Signalization at Gate 9	Completed
CALTRANS				
4	47	Henry Ford Avenue/ T.I. Freeway interchange	Construct 2-lane ramps, signalization, R.R. crossing	Completed
10	47	Toll plaza	Intersection modification	Completed
14	103	Terminal Island Freeway (PCH to Willow Street)	Prepare for relinquishment	Not funded
CARSON/LOS ANGELES COUNTY				
11	47	Alameda Street (Lomita Blvd. to San Diego Freeway)	Construct 6 lanes, signalization	Bid opening targeted for 1994
11a	47	Alameda Street (San Diego Freeway to Del Amo Blvd.)	Widen to 6 lanes, signalization	Bid opening targeted for 1995
11b	47	Alameda Street (Del Amo Blvd. to Artesia Freeway)	Widen to 6 lanes, signalization	Delayed to accommodate other Ports Access project

Source: ACTA, 1994.

TABLE 2-4
PORTS ACCESS DEMONSTRATION PROJECTS - PHASE II

PROJ. NO.	STATE RT. #	LOCATION	IMPROVEMENT	STATUS
CARSON/LOS ANGELES COUNTY				
21	47	Alameda/Carson Street	Grade separation	Construction targeted to begin August 1994
22	47	Alameda/Del Amo	Grade separation	To be designed
23	47	Alameda, Del Amo to Artesia Freeway	Widen to 6 lanes	
CITY OF LOS ANGELES				
24	47	Alameda, N/O PCH	Widen to 6 lanes, replace railroad bridge (combined with 3e)	In design
PORT OF LONG BEACH				
25	710	Gerald Desmond Bridge	Widen to 5 lanes	Construction targeted to begin in August 1995
CALTRANS				
27	47	Seaside Toll Plaza	Eastbound grade separation	In planning

Source: ACTA, 1994.

TABLE 2-5
PORTS ACCESS DEMONSTRATION PROJECTS - PHASE III

PROJ. NO.	STATE RT. #	LOCATION	IMPROVEMENT	STATUS
COUNTY OF LOS ANGELES				
31	47	Alameda - Del Amo to Artesia Freeway	Construct 6 lanes, grade separation near Laurel Park Road	In planning
CITY OF CARSON				
32	47	Alameda/Sepulveda	Grade separation	In planning
CITY OF LOS ANGELES				
30	N/A	Anaheim Street/Dominguez Channel	Reconstruct/widen bridge	In planning
CALTRANS				
28	1	Pacific Coast Highway	Grade separation	In planning
29	47	Ocean Boulevard/ Terminal Island Freeway	Construct interchange	In planning

Source: ACTA, 1994.

CHAPTER 3

AFFECTED ENVIRONMENT

3.0 SETTING

3.1 INTRODUCTION

This chapter reviews the environmental setting for air quality, cultural resources, hydrology and water quality, hazardous materials and vegetation and wildlife analyses. These are the impact areas for which additional analysis/documentation, beyond what is included in the EIR, is provided to meet National Environmental Policy Act (NEPA) requirements.

The following index shows the organization of the topics discussed in the EIS and EIR. The analysis reported in the EIR is a part of this EIS.

TOPIC	EIS SECTION		EIR SECTION
	SETTING	IMPACTS & MITIGATION	
AIR QUALITY	3.2	4.2	4.3
CULTURAL RESOURCES	3.3	4.3	5.8
HYDROLOGY & WATER QUALITY	3.4	4.4	4.2
HAZARDOUS MATERIALS	3.5	4.5	4.1, 5.6
VEGETATION & WILDLIFE	3.6	4.6	4.7
TOPOGRAPHY, GEOLOGY & SOILS		4.7.2	4.1
NOISE		4.7.3	4.4
VIBRATION		4.7.4	4.5
ENERGY		4.7.5	4.6
LAND USE		4.7.6	5.1
POPULATION & HOUSING		4.7.7	5.2
ACQUISITION & DISPLACEMENT		4.7.8	5.3
TRANSPORTATION & CIRCULATION		4.7.9	5.4
PUBLIC SERVICES		4.7.10	5.5
SAFETY & SECURITY		4.7.11	5.6
AESTHETICS		4.7.12	5.7
ECONOMICS		4.7.13	5.9

3.2 AIR QUALITY

The purpose of this section is to discuss the affected environment of the proposed project with regard to air quality considerations. The affected environment includes the South Coast Air Basin and the immediate vicinity of the project itself. Recently, the regulatory environment governing air quality issues has undergone substantial change, and therefore it is also necessary to describe the nature of these changes. It should be noted that the Environmental Impact Report previously prepared for the project contained a complete analysis of air quality issues. The purpose of the present discussion of the affected environment (and the environmental

consequences, see section 4.2 of this EIS) is to consider air quality issues within the context of specific federal requirements. (See also section 4.3 of the EIR.)

3.2.1 Regulatory Framework

Regulations for air pollutant emissions exist to protect human health and welfare and the environment. Various federal, state and local regulatory agencies such as the U.S. Environmental Protection Agency (U.S. EPA), the California Air Resources Board (ARB) and the South Coast Air Quality Management District (SCAQMD) exist to research, develop and enforce the regulations that help govern air quality. The federal regulatory agency is the U.S. EPA, with responsibility for establishing national ambient air quality standards as well as developing and approving the implementation of plans developed by the state. The California ARB is responsible for establishing state ambient air quality standards, developing and approving local district air quality management plans and establishing motor vehicle emissions regulations. The SCAQMD is the local agency responsible for the enforcement of rules and regulations pertaining to stationary and some mobile sources.

3.2.1.1 Federal Clean Air Act

The 1970 Federal Clean Air Act established National Ambient Air Quality Standards (NAAQS) for the protection of human health and welfare. Presently, the following six criteria pollutants are addressed in the NAAQS: ozone, carbon monoxide (CO), nitrogen dioxide (NO_2), sulfur dioxide (SO_2), particulate matter less than 10 microns (0.0004 inches) in diameter (PM_{10}) and lead. NAAQS are tabulated in Table 3-1. Since enactment of the original Federal Clean Air Act, subsequent amendments have been passed which require states to submit State Implementation Plans (SIPs) to the EPA that describe how and when compliance with the NAAQS will be achieved. The most recent 1990 Amendments address nonattainment, mobile source emissions, air toxics, acid rain, a new federal permit program, enforcement and protection of stratospheric ozone.

Non-criteria pollutants, also regulated under the Federal Clean Air Act, include asbestos, beryllium, mercury, vinyl chloride, fluorides, sulfuric acid mist, hydrogen sulfide, total reduced sulfur and reduced sulfur compounds. None of these are expected to be released in measurable quantities from the proposed project.

3.2.1.2 California Clean Air Act

As a parallel to the Federal Clean Air Act, California also enacted the California Clean Air Act (CCAA) of 1988 to adopt and enforce regulations to achieve and maintain California ambient air quality standards (CAAQS). State standards (also listed in Table 3-1) exist for ozone, carbon monoxide, nitrogen dioxide, sulfur dioxide, suspended particulate matter less than 10 microns (0.0004 inches) in diameter (PM_{10}), lead, hydrogen sulfide, sulfates and vinyl chloride. The CCAA makes the ARB responsible for establishing criteria for designating air basins as "attainment," "non-attainment" or "unclassifiable" in accordance with State standards.

The CCAA requires air districts to submit plans for attaining and maintaining the CAAQS to the ARB. Plans will be submitted every three years until the air district is considered to be in attainment of the State standards.

TABLE 3-1
FEDERAL AND STATE AIR QUALITY STANDARDS

POLLUTANT	AVERAGING PERIOD	CALIFORNIA STANDARD[1]	FEDERAL STANDARD[2]	
			PRIMARY[3]	SECONDARY[4]
Ozone	1 Hour	0.09 parts per million (ppm)	0.12 ppm	Same as primary
Carbon Monoxide	1 Hour	20 ppm	35 ppm	Same as primary
	8 Hours	9.0 ppm	9 ppm	
Nitrogen Dioxide	1 Hour	0.25 ppm	No Standard (NS)	NS
	Annual	NS	0.053 ppm	Same as primary
Sulfur Dioxide	1 Hour	0.25 ppm	NS	NS
	3 Hours	NS	NS	1300 micrograms per cubic meter ($\mu g/m^3$)
	24 Hours	0.05 ppm	365 $\mu g/m^3$	NS
	Annual	NS	80 $\mu g/m^3$	NS
Suspended Particulates (PM_{10})	24 Hours	50 $\mu g/m^3$	150 $\mu g/m^3$	Same as primary
	Annual Arithmetic Mean	NS	50 $\mu g/m^3$	
	Annual Geometric Mean	30 $\mu g/m^3$	NS	NS
Lead	30 days	1.5 $\mu g/m^3$	NS	NS
	Calendar Quarter	NS	1.5 $\mu g/m^3$	Same as primary
Sulfates	24 Hours	25 $\mu g/m^3$	NS	NS
Hydrogen Sulfide	1 Hour	0.03 ppm	NS	NS
Vinyl Chloride	24 Hours	0.010 ppm	NS	NS
Visibility[5]	8 Hours	Reduce visibility below 10 miles	NS	NS

Notes:
1 California standards for ozone, carbon monoxide, sulfur dioxide (1-hour), nitrogen dioxide, suspended particulate matter - PM10 and visibility are values that are not to be exceeded. The sulfur dioxide (24-hour), sulfates, lead, hydrogen sulfide and vinyl chloride standards are not to be equaled or exceeded.
2 Federal standards, other than ozone and those based on annual averages, are not to be exceeded more than once a year. The ozone standard is attained when the expected number of days per calendar year with maximum hourly average concentrations above the standard is equal to or less than one.
3 National Primary Standards: the levels of air quality necessary to protect the public health with an adequate margin of safety.
4 National Secondary Standards: the levels of air quality necessary to protect the public welfare from any known or anticipated adverse effects of a pollutant.
5 This standard is intended to limit the frequency and severity of visibility impairment due to regional haze and is equivalent to a 16-kilometer (10-mile) nominal visual range when relative humidity is less than 70 percent.

Source: California Air Resources Board Air Quality Data - General Summary, 1989.

3.2.1.3 California Air Resources Board

The ARB is responsible for developing the State Implementation Plan and assuring that districts are in compliance; it is directly responsible for non-stationary sources and vehicular emissions controls and for implementing specific statutory programs, including the California Clean Air Act.

3.2.1.4 South Coast Air Quality Management District

The South Coast Air Quality Management District (SCAQMD) has the dual responsibilities of a) developing and enforcing rules and regulations to improve air quality in the South Coast Air Basin (SCAB) and b) developing (in conjunction with the Southern California Association of Governments, [SCAG]) the region's Air Quality Management Plan (AQMP) in response to the Federal and State Clean Air Acts.

Rules and Regulations

The SCAQMD regularly publishes rules and regulations regarding air quality, and it has many prohibitory regulations to minimize the local impact of stationary emission sources. Rules pertinent to the proposed project are as follows:

Rule 401 – Visible Emissions: Degree of opacity may not exceed established standards for more than 3 minutes in any one hour.

Rule 402 – Nuisance: Air contaminants must not endanger the comfort, repose, health or safety of any considerable number of persons or the public and must not cause injury or damage to business or property.

Rule 403 – Fugitive Dust: Fugitive dust must be minimized; visible emissions are not allowed beyond the property line. Total suspended particulate matter must not exceed 100 micrograms per cubic meter ($\mu g/m^3$) when determined as the difference between upwind and downwind samples at the property line for a minimum of five hours. Reasonable precautions must also be taken to prevent visible particulate matter from being deposited on public roadways.

Rule 1166 – VOCs (volatile organic compounds) from soil decontamination - Emissions of volatile organic compounds (VOCs) resulting from contaminated soil must be limited. Excavating underground tanks containing VOCs must be done with proper notification and procedures. Persons treating or handling VOC-contaminated soils must follow certain procedures for the collection and disposal of VOCs. Exemptions are available for small quantities.

South Coast Air Basin Air Quality Management Plan

Local air pollution control districts throughout the state, including the SCAQMD, must provide input into the State Implementation Plan (SIP) by submitting an Air Quality Management Plan (AQMP). Several local and state agencies are responsible for completing the South Coast Air Basin (SCAB) Air Quality Management Plan (AQMP). The SCAQMD is responsible for completing the overall AQMP; the Southern California Association of Governments (SCAG) is responsible for developing regional plans and control measures for transportation, growth management and land use; and the ARB is responsible for developing mobile source control measures (e.g., vehicle emission standards and fuel specifications).

The AQMP has been subject to periodic revisions since it was originally prepared and adopted by EPA in 1979. The most recent locally-adopted version of the AQMP was prepared in 1994. Prior to this version, the 1991 revision was the most recently adopted.

The 1994 AQMP was adopted by the SCAQMD Hearing Board on August 12, 1994. The purpose of this AQMP revision, in addition to updating and refining the information contained in the 1991 AQMP, is to respond to specific federal and state requirements. Portions of the 1994 AQMP were incorporated into the 1994 State Implementation Plan (SIP) revision for the South Coast Air Basin. The 1990 Clean Air Act Amendments identify specific emission reduction goals, require a demonstration of reasonable further progress as well as attainment and incorporate more stringent sanctions for failure to achieve attainment or interim milestones. In addition, the 1990 Clean Air Act Amendments require the SCAQMD to develop: (1) a Federal Attainment Plan for ozone, (2) a post-1996 Rate-of-Progress Plan, (3) ozone attainment demonstrations for two portions of the adjacent Southeast Desert Air Basin and (4) a PM_{10} State Implementation Plan. The 1994 AQMP revision addresses these requirements.

The 1994 AQMP revision also addresses requirements of the 1988 California Clean Air Act. Included among these requirements are: (1) application of Best Available Retrofit Control Technology, (2) reductions of non-attainment pollutants by 5 percent per year, (3) achieving an average vehicle occupancy during peak commuting periods of 1.5 persons per vehicle, (4) ensuring no net increase in emissions after 1997, (5) reducing population exposure to severe non-attainment pollutants and (5) ranking control measures by cost effectiveness and implementation priority.

The 1994 AQMP revision contains a comprehensive control program designed to lead the SCAB into compliance with all federal and state air quality standards by the year 2010. The 1994 AQMP targets attainment of the federal nitrogen dioxide standard by 1994; attainment of the federal PM_{10} standard by 2006 and the federal ozone standard by 2010; and attainment of the federal carbon monoxide standards by 2000. Table 3-2 summarizes the expected dates for attainment of the state and federal standards for the four criteria pollutants.

The 1994 AQMP's attainment strategy includes control methods categorized into two tiers, based on availability and readiness for implementation. The two tiers are as follows:

Short- and Intermediate-Term Measures - Full implementation of available technological applications and effective management practices. Adoption and implementation between 1994 and 2005.

Long-Term Measures - Advancement of technologies and control methods that can reasonably be expected to occur between 1994 and 2010.

Among its attainment strategies the AQMP includes stationary source control, mobile source control, land use-related control and market incentives, including the proposed rail corridor consolidation project. The emissions reduction estimates for the four criteria pollutants are presented in the AQMP assuming project adoption and implementation over the next ten to fifteen years.

TABLE 3-2
EXPECTED YEAR FOR ATTAINMENT OF THE STATE AND FEDERAL STANDARDS FOR THE FOUR CRITERIA POLLUTANTS

Pollutant	Standard	Concentration Level	Expected Compliance Year
Ozone	Federal 1-hour	12 pphm*	2010
	State 1-hour	9 pphm	beyond 2010
PM_{10}	Federal Annual	50 $\mu g/m^3$	2006
	Federal 24-hour	150 $\mu g/m^3$	2000
	State Annual	30 $\mu g/m^3$	beyond 2010
	State 24-hour	50 $\mu g/m^3$	beyond 2010
CO	Federal 8-hour	9 ppm	2000
	Federal 1-hour	35 ppm	1990
	State 8-hour	9 ppm	2000
	State 1-hour	20 ppm	2000
NO_2	Federal Annual	5 pphm	1994
	State 1-hour	25 pphm	1997

Note: The compliance year is calculated based on the highest concentrations observed during a three-year period. ARB's recommended guidelines on design day calculations allow for the elimination of extreme concentrations; and the ARB and the District will further review the data to determine if the design values should be adjusted based on this consideration.

*pphm = parts per hundred million

Source: South Coast Air Quality Management District 1994 Air Quality Management Plan, 1994.

3.2.2 Conformity Regulations

On November 24, 1993, the EPA published its final rulemaking, *Criteria and Procedures for Determining Conformity to State or Federal Implementation Plans of Transportation Plans, Programs, and Projects Funded or Approved Under Title 23 U.S.C. or the Federal Transit Act* (40 CFR Parts 51 and 93). The purpose of this is to provide the rules by which a project or plan may be judged to conform or not conform with current air quality plans and regulations. Central to the issue of determining conformity is the acceptability at the federal level of the air quality plans of the various states, and in turn, the district AQMPs. At the present time, the South Coast Air Quality Management District and the California Air Resources Board have submitted attainment plans for carbon monoxide and nitrogen dioxide, as well as a state-of-progress plan for ozone, and therefore the SCAB is in the "transitional period" as defined in the Conformity Procedures (see section 3.2.3 for further discussion). The conformity rules pertaining to the transitional period must therefore be followed.

Conformity is defined in the EPA rulemaking as follows:

> *Conformity to an implementation plan is defined in the Clean Air Act as conformity to an implementation plan's purpose of eliminating or reducing the severity and number of violations of the national ambient air quality standards and achieving expeditious attainment of such standards. In addition, Federal*

activities may not cause or contribute to new violations of air quality standards, exacerbate existing violations, or interfere with timely attainment or required interim emission reductions towards attainment.

In order to satisfy the definition of conformity stated above, the EPA rulemaking outlines a number of requirements which a project must satisfy. These are:

- The project must come from a regional transportation plan and program which are in conformance.
- The conformity determination must be based on the latest planning assumptions and emissions estimation methodology.
- The Metropolitan Planning Organization (SCAG) must make the determination.
- The project must not cause or contribute to new violations for carbon monoxide (CO) or PM_{10}, or increase the frequency of such violations.
- The project must eliminate or reduce CO violations.

Satisfaction of the conformity requirements by the proposed project is addressed in section 4.2.5 of this EIS.

3.2.3 Federal Implementation Plan

As a result of a lawsuit brought by a private party (*Abramowitz v. EPA, 832 F.2d 1071; 9th Cir. 1987*), the EPA was compelled to disapprove the 1982 AQMP prepared by the SCAQMD. Subsequently, a second lawsuit (*Coalition for Clean Air v. EPA, reported as Coalition for Clean Air v. Southern Cal. Edison, 971 F.2d 219; 9th Cir. 1992*), has compelled the EPA to prepare a Federal Implementation Plan (FIP) for the SCAB, to achieve attainment of the National Ambient Air Quality Standards for ozone and carbon monoxide. The EPA issued its proposed FIP in February 1994. A Final FIP was approved, but prior to publication the FIP was rescinded legislatively in April 1995 in an amendment to the Defense Department's appropriation. The result is that the California State Implementation Plan (SIP) has become the operative program to improve the state's air quality. On April 18, 1995, EPA certified that the SIP was "complete" (contains the necessary components, i.e., emission inventories, modeling, control strategies, to reach attainment). EPA is currently reviewing the SIP for substantive compliance with the Clean Air Act.

3.2.4 Environmental Setting

The proposed project is located within the SCAB. The SCAB covers over 17,000 square kilometers (6,600 square miles) and is bounded on the west by the Pacific Ocean, on the south by the San Diego County line, and to the north and east by the San Gabriel, San Bernardino, and San Jacinto mountains.

3.2.4.1 Climate

In general, Southern California has a Mediterranean climate characterized by warm dry summers and mild winters, as a result of Southern California's location on the southeastern edge of the Pacific High Pressure Area, which forces most low meteorological formations to the north and results in a prevailing stable weather pattern. Infrequent interruptions of this climatological pattern occur during extreme periods of hot weather, winter storms or Santa Ana winds. Santa Ana winds are occasionally occurring strong north or northeasterly winds blowing from inland deserts. These conditions disperse air contaminants within the basin; however, when the Santa Ana conditions are weak, air stagnates along the coastline and air quality at the coast may become worse than at inland sites.

Winds in the vicinity of the project blow predominantly from the southwest and west, with relatively low velocities. Wind speeds measured in the area average about 8 kilometers per hour (5 miles per hour). Summer wind speeds average slightly higher than winter wind speeds. Low average wind speeds, together with a persistent temperature inversion, limit the vertical dispersion of air pollutants throughout the basin.

Temperatures in the basin are generally mild, increasing from the coast inland. Average annual high and low temperatures measured near the project were 23.33°C and 11.67°C (74 and 53°F), respectively, over the last 30 years of record.

Most of the annual rainfall occurs between November and April. Rainfall totals have averaged approximately 23 centimeters (9 inches) per year near the project over the last 40 years. Rainfall has varied from 13 to 53 centimeters (5 to 21 inches) per year over the same reporting period for differing areas in the basin.

During the summer, the dominant climatic feature is the Pacific High, a high pressure cell that heats air by compression. This in turn creates a temperature inversion layer at an altitude of about 610 meters (2,000 feet) or less above sea level. This inversion, coupled with the presence of mountain ranges to the north, causes polluted air to be trapped in the basin. Prevailing sunny days further exacerbate this problem by inducing additional adverse photochemical reactions. Because the inversion layer is not prevalent during most other times of the year, air quality problems are typically reduced during seasons other than summer.

3.2.4.2 Major Pollutants and Associated Health Effects

Both the federal and state governments have set health-based ambient air quality standards for the following six pollutants: sulfur dioxide (SO_2), lead (Pb), ozone (O_3), nitrogen dioxide (NO_2), carbon monoxide (CO) and fine particulates less than 10 microns (0.0004 inches) in size (PM_{10}). The SCAB currently complies with the standards for both sulfur dioxide and lead but exceeds the standards for the remaining four pollutants. In addition, California has set standards for ethylene, hydrogen sulfide, sulfates, visibility and vinyl chloride. All but sulfates and visibility are controlled through permit requirements. Sulfates and visibility are addressed through control programs for the four pollutants discussed below.

Carbon Monoxide

Carbon monoxide is formed by the incomplete combustion of fossil fuels and is produced almost entirely by automobiles. Exposure to carbon monoxide can cause dizziness and fatigue and can impair central nervous system function. The number of days exceeding the carbon monoxide standards decreased substantially by the mid-1980s, increased in the late 1980s, then decreased again in the 1990s. In 1992, Los Angeles County exceeded the federal carbon monoxide standard more than any other area of the United States.

Nitrogen Dioxide

Nitrogen dioxide and nitric oxide are formed as a result of fuel combustion under high temperature or pressure. These compounds are referred to together as nitrogen oxides or NO_x. Nitrogen dioxide contributes to other pollution problems, including concentration of ozone, fine particulate matter, poor visibility and acid deposition. It decreases lung function and may reduce resistance to infection. By 1991, the federal standard had been exceeded in only one location in Los Angeles County, and in 1992 and 1993, no location in the Basin exceeded the federal standard. However, the state standard continued to be exceeded.

Ozone

Ozone is formed by photochemical reactions between NO_x and reactive organic gases (ROG). Reactive organic gases are formed from the combustion of fuels and the evaporation of organic solvents. Elevated ozone concentrations result in reduced lung function, particularly during vigorous physical activity. This health problem is particularly acute in children. Ozone levels in the SCAB exceed the federal standard far more frequently than anywhere else in the country.

PM_{10}

PM_{10} refers to small suspended particles that are 10 microns (0.0004 inches) or less in diameter. Nitrates and sulfates, as well as dust particles, are major components. These small particles can be directly emitted as a by-product of fuel combustion, through abrasion such as wear on tires or brake linings or through wind erosion of soil. They can also be formed in the atmosphere through chemical reactions. These particles may carry carcinogens and other toxic compounds which adhere to the particle surfaces and can enter the lungs. In 1993, state PM_{10} standards were exceeded in most areas, frequently by a wide margin. The less stringent federal PM_{10} standards were also exceeded in many areas.

Sulfur Dioxide

Sulfur dioxide is produced by the combustion of sulfur-containing fossil fuels. Its primary health effects include aggravation of respiratory diseases, such as asthma and emphysema, reduced lung function and eye irritation. Sulfur dioxide levels in the SCAB are typically well below both the federal and state standards.

3.2.4.3 Sources of Pollution

According to the SCAQMD (1994 AQMP), at the present time, mobile sources account for approximately 98 percent of carbon monoxide production in the SCAB. On-road mobile sources

(primarily autos and trucks) account for nearly all of this production. Locomotive emissions account for less than one percent of regional CO emissions. The remainder is attributable to stationary sources. Daily production of carbon monoxide in the SCAB in 1990 was 6,122 metric tons (6,749 tons).

Approximately 62 percent of the volatile organic compounds produced in the SCAB come from mobile sources, and nearly all of this is attributable to on-road vehicles. Locomotives account for less than one percent of regional hydrocarbon emissions. The balance is produced in nearly equal amounts by residential, commercial/service industry sources and the industrial/manufacturing sector. Daily production of volatile organic compounds in the SCAB in 1990 was 1,317 metric tons (1,452 tons).

Mobile sources account for 83 percent of daily nitrogen oxide production in the SCAB. Of this, two-thirds is attributable to on-road vehicles. Locomotives account for slightly less than three percent of regional NO_x emissions. Fuel combustion accounts for 54 percent of all stationary source contributions. In 1990, 1,208 metric tons (1,332 tons) of nitrogen oxides were produced daily in the SCAB.

In 1990, 756 metric tons (833 tons) per day of particulate matter (PM_{10}) were produced in the SCAB. Locomotives account for less than one percent of regional particulate emissions. Stationary sources accounted for 89 percent of the total.

3.2.4.4 Current Air Quality

Air quality in the basin is monitored by the SCAQMD through a network of monitoring stations located throughout the basin. These data detail the current air quality status and progress toward attainment of federal and state air quality standards.

Monitoring stations which provide data for the project study area are located in Los Angeles (near downtown), Lynwood, Long Beach and Hawthorne. Data for the last three years are given in Table 3-3, describing the number of exceedances of the federal and state standards. The data for sulfur dioxide and lead are not shown since there have not been violations in recent years. It should be noted that there is some question as to the applicability of the Lynwood station data for this project, due to its abnormally high concentrations. The ARB's recommended guidelines on AQMP design day calculation allow the elimination of extreme concentrations; and the ARB and the SCAQMD are further reviewing the data to determine if the design values should be adjusted based on this consideration.

TABLE 3-3
EXCEEDANCES OF FEDERAL AND STATE AIR QUALITY STANDARDS AT STUDY AREA MONITORING STATIONS: 1991-93

Standard or Measurement	Monitoring Station											
	Los Angeles[1]			Lynwood[2]			Long Beach[3]			Hawthorne[4]		
	1991	1992	1993	1991	1992	1993	1991	1992	1993	1991	1992	1993
CARBON MONOXIDE[5]												
Federal: 1-Hour	0	0	0	0	0	0	0	0	0	0	0	0
8-Hour	0	2	0	41	31	22	1	0	0	7	7	3
State: 1-Hour	0	0	0	4	5	1	0	0	0	0	0	0
8-Hour	0	2	0	41	36	29	1	0	0	10	11	6
OZONE[5]												
Federal: 1-Hour	23	23	8	1	4	0	0	6	1	0	1	1
State: 1-Hour	59	57	34	20	17	7	4	19	15	17	11	9
NITROGEN DIOXIDE												
Federal: % above std.[6]	0	0	0	0	0	0	0	0	0	0*	0	0
State: 1-Hour[5]	4	1	0	2	0	0	2	0	0	0*	0	0
SUSPENDED PARTICULATES (PM_{10})[7]												
Federal: 24 Hours	1	0	0	ND	ND	ND	0	0	0	0	0	0
State: 24 Hours	31	22	26	ND	ND	ND	10	11	12	14	5	9

Notes:
1. The Los Angeles monitoring station is located at 1630 No. Main Street.
2. The Lynwood monitoring station is located at 11220 Long Beach Boulevard.
3. The Long Beach monitoring station is located at 3648 No. Long Beach Boulevard.
4. The Hawthorne monitoring station is located at 5234 W. 120th Street.
5. Number of days exceeding standard.
6. The federal standard is an annual arithmetic mean value greater than 0.0534 parts per million.
7. Number of samples exceeding standard.

* There are less than 12 full months of data available.

Source: South Coast Air Quality Management District, *Air Quality Data Sheets*, 1991-1993.

3.3 CULTURAL RESOURCES

Please see Section 5.8 of the EIR for additional detailed discussion of evaluation criteria for cultural resources.

3.3.1 Regulatory Framework: Section 106 Compliance

The following analysis has been prepared in accordance with regulations 36 CFR 800 for implementing Section 106 of the National Historic Preservation Act of 1966 (Section 106), as amended. Section 106 requires that Federal agencies take into account the effects of their projects on properties listed in or determined eligible for inclusion in the National Register of Historic Places. In accordance with this law and with the guidelines for its implementation promulgated by the President's Advisory Council on Historic Preservation (Council), the Federal Highway Administration (FHWA) and Caltrans have undertaken an analysis of archaeological, historic and architectural resources that could be affected by the proposed project.

This analysis updates the Alameda Corridor Environmental Impact Report (EIR) which identified cultural resources, including both archaeological and historic/cultural resources, and the potential effects of the proposed project alternatives on these resources pursuant to the California Environmental Quality Act (CEQA). At the time the EIR was prepared Federal funding sources for the entire project had not been identified, although Federal funding had been identified for several individual grade separation projects, each of which would have had its own environmental document under the National Environmental Policy Act (NEPA). Now that it has been determined that the project will pursue Federal funding for the project as a whole, the appropriate cultural resources documentation compliance with Federal legislation is required.

3.3.1.1 Coordination with the State Historic Preservation Officer

The State Historic Preservation Officer (SHPO) coordinates state participation in the implementation of Section 106. In accordance with guidelines of the Council, FHWA will consult with the SHPO in identifying historic properties eligible for the National Register, assessing project effects upon those properties, and considering alternatives or mitigation to avoid or reduce those effects.

A request for determination of eligibility and finding of effect as summarized in this document was submitted to the SHPO for review and concurrence on September 23, 1994. On October 27, 1994 the SHPO concurred with findings of eligibility, but also requested some additional information. Also, in response to the SHPO's request, a formal effects determination has been submitted by FHWA.

3.3.1.2 Identifying Historic Properties

Area of Potential Effect

Compliance with Section 106 involves delineation of an Area of Potential Effects (APE) developed under SHPO agreement. The following definition of the APE for the proposed project was developed and subsequently proposed on May 25, 1994 to staff of the California Office of Historic Preservation (OHP):

Railroad operations have been part of the historic character of the Alameda Corridor since 1869. With the exception of the Dominguez Adobe, railroad facilities predate all other buildings, structures and objects along the Alameda Corridor. An Area of Potential Effects (APE) has been defined to ensure proper identification of historic resources which might be affected by the project, but also to be reasonable in its acknowledgment of the historic appropriateness of railroad activity in proximity to the predominantly industrial character of the project area. The multi-level APE definition is based on right-of-way acquisition information, noise significance criteria, and historic railroad land use conditions as follows:

- *when right-of-way acquisition includes taking of a structure, the APE includes the parcel being taken and all adjacent parcels which have a structure within 60 meters (200 feet) of the property being taken;*

- *when right-of-way acquisition includes only partial taking of a property and does not involve the taking of a structure, the APE is limited to the parcel being taken;*

- *when a noise sensitive receptor falls within the predicted 67 dBA noise contour line, the parcel containing the noise sensitive receptor shall be included in the APE, if not already included as a result of the right-of-way criteria;*

- *when the property is currently used for railroad purposes, project improvements are limited to at- or below-grade track reconfiguration, and no structures would be demolished, the APE is limited to the maximum extent of the right-of-way acquisition.*

Otherwise, the APE boundary will be coincident with the limits of project improvements within the public right-of-way. The Archaeological APE is limited to the project right-of-way and does not include noise sensitive receptors.

Because the proposed project is in a trench configuration throughout the built environment of greatest density and because entirely at-grade alternatives had also been considered in the EIR, the APE for the proposed project is much more focused than the study area used in the CEQA compliance process. As a result, many of the resources identified in the EIR would not undergo any effect as a result of undertaking the proposed project and are therefore not included in the Section 106 compliance process, for example: the Firestone Tire and Rubber Plant; Dominguez Water Company; San Antonio Winery; and the Pueblo Del Rio public housing project. Many large industrial buildings along Alameda Street are not noise sensitive, have always had railroad activity as part of their setting and would not have any portion of their property acquired by the project. Such resources, including the Desser Tire Factory and Jorgensen Steel would not undergo any effect and therefore have also been excluded from the APE. Still other resources identified in the EIR are part of another undertaking and any substantial effect upon them would not be a result of the Alameda Corridor project. Such resources include the Badger Avenue Bridge, which is currently slated for replacement by the Port of Los Angeles and is being

assessed in a separate environmental document, and the Redondo Junction Tower which is planned to be put out of service as a result of Metrolink technological advancements.

Setting the boundaries of the Alameda Corridor proposed project *Area of Potential Effects* defines a study area used during preparation of an *Historic Properties Survey Report* and National Register of Historic Places *Determination of Eligibility Report*. The Area of Potential Effects, identification of historic resources and SHPO concurrence with both eligibility and effects findings are essential components in the Section 106 compliance process. According to Caltrans procedures, a request for determination of eligibility and finding of effect as summarized in this document was also submitted to the SHPO for review and concurrence on September 23, 1994. Similar documentation will also be provided to the Council.

Review of Existing Information

In order to identify potentially important historic, architectural, or cultural resources, previously documented resources for each of the jurisdictions in the vicinity of the proposed project were compiled from a variety of sources and reviewed. Historic resource inventories, designations, organizations, or persons consulted included the following:

- Archaeological Information Center of the University of California at Los Angeles (UCLA)
- National Register of Historic Places
- California Historical Landmarks
- State Office of Historic Preservation Statewide Database
- Los Angeles County Points of Historic Interest
- City of Los Angeles Historic-Cultural Monuments List
- City of Huntington Park's Guide to Architecturally Significant Buildings in Huntington Park
- City of South Gate Historic Surveys–Los Angeles County Preservation Planning Project (June 1983)
- Historical Analysis of the Hon Industries (Firestone) Plant
- Age of Public Facilities Table & Map (Sources for map: Los Angeles Unified School District, Paramount Unified School District, and the City of South Gate Planning Department)
- Map of South Gate Historical Sites (Sources for map: Bicentennial Booklet, 1976; City of South Gate Building Department Records, 1980.)
- City of Lynwood Chamber of Commerce

- City of Compton Community Planning and Development Department
- Carson Fine Arts & Historical Commission
- City of Long Beach Historical Landmarks List
- Previously documented historic/architectural surveys included Gebhard & Winter 1985, Los Angeles Department of Planning (LADOP) Survey of Southeast Los Angeles (1991), and the Los Angeles Bureau of Engineering (LABOE) 1983 Watts Survey.

This information was analyzed, mapped, and illustrated in the 1992 Alameda Corridor DEIR for all previous alternatives. It served to help establish the quality and density of cultural resources in the vicinity of the Area of Potential Effects of the proposed project.

Public Participation and Coordination

Information on historic properties in the project area was sought from local governments, Indian tribes, public and private organizations, and other parties likely to have knowledge of or concerns with such resources.

Native American notification and consultation was initiated on May 4, 1994 with Lillian Robles of the Juaneno Nation, Vera Rocha and Cindi Alvitre of the Gabrielino Nation, and Martin Alcala of the Gabrielino/Tongva Nation. A copy of the map illustrating the proposed project has been sent to each representative for review.

Cities located along the Alameda Corridor and local historic organizations were notified on May 4, 1994 of the project and asked for records of any buildings, districts, sites, landscapes or archaeological sites of cultural significance within the project area. Each organization received a copy of the "List of Historic/Cultural Resources Within 457 Meters (1,500 Feet) of Alternative Alignment Centerline" excerpted from the *Alameda Corridor Environmental Impact Report* and a copy of the proposed project map for review.

City representatives and persons contacted included: Pat Brown, City of Carson; John Johnson, City of Compton; Steve Masura, City of Huntington Park; Oliver Mujica, City of South Gate; Victor Vaites, City of Vernon; and Jeanne Kyle, Carson Estate Company.

Local historic organizations consulted included: Diane Williams, Pasadena Society of Architectural Historians; Jay Oren, City of Los Angeles Cultural Affairs Department; David G. Cameron, Los Angeles County Historical Landmarks and Records Commission; Barbara Hoff, Los Angeles Conservancy; John Berry, Santa Fe Railway Historical Society; and Pat Bowie, Los Angeles City Historical Society.

National Register of Historic Places Criteria for Evaluation

An essential component of the Section 106 compliance process is the evaluation of historic properties for eligibility for inclusion in the National Register of Historic Places. Each property within the Area of Potential Effects must be evaluated according to broadly drawn criteria that

require that an historic property retains integrity, and is associated with important historic lives or events, is historically, architecturally, or artistically distinctive, or is valuable as a source of information:

National Register criteria for evaluation.

The quality of significance in American history, architecture, archaeology, engineering, and culture is present in districts, sites, buildings, structures, and objects that possess integrity of location, design, setting, materials, workmanship, feeling, and association and

(a) that are associated with events that have made an important contribution to the broad patterns of our history or

(b) that are associated with the lives of persons important in our past or

(c) that embody the distinctive characteristics of a type, period, or method of construction, or that represent the work of a master, or that possess high artistic values, or that represent an important and distinguishable entity whose components may lack individual distinction or

(d) that have yielded, or may be likely to yield, information important in prehistory or history.

Criteria considerations.

Ordinarily cemeteries, birthplaces, or graves of historical figures, properties owned by religious institutions or used for religious purposes, structures that have been moved from their original locations, reconstructed historic buildings, properties primarily commemorative in nature, and properties that have achieved significance within the past 50 years shall not be considered eligible for the National Register. However, such properties will qualify if they are integral parts of districts that do not meet the criteria or if they fall within the following categories:

(a) A religious property deriving primary significance from architectural or artistic distinction or historical importance or

(b) A building or structure removed from its original location but which is important primarily for architectural value, or which is the surviving structure most importantly associated with a historic person or event or

(c) A birthplace or grave of a historical figure of outstanding importance if there is no appropriate site or building directly associated with his productive life.

(d) A cemetery which derives its primary significance from graves of persons of transcendent importance, form age, from distinctive design features, or from association with historic events or

(e) A reconstructed building when accurately executed in a suitable environment and presented in a dignified manner as part of a restoration master plan, and when no other building or structure with the same association has survived or

(f) A property primarily commemorative in intent if design, age, tradition, or symbolic value has invested it with its own exceptional significance or

(g) A property achieving significance within the past 50 years if it is of exceptional importance.

[Source: *Code of Federal Regulations*, Title 36, Part 60.4. Authority: *National Historic Preservation Act of 1966*, as amended, 16 U.S.C. 470 et seq., and Executive Order 11593]

The results of the application of the above criteria by qualified professionals on behalf of the lead agency are then submitted to the State Historic Preservation Officer for review and concurrence. For this project, an *Historic Property Survey Report*, which includes eligibility findings, was submitted to the California State Historic Preservation Officer (SHPO) on September 23, 1994, and on October 27, 1994, the SHPO concurred with findings of eligibility and requested some additional information. Also, in response to the SHPO's request, a formal effects determination has been submitted by FHWA.

3.3.2 Archaeological Resources

3.3.2.1 Locating Archaeological Resources

Archival Search

In order to identify previously recorded archaeological resources, an archival search was conducted for an area within 1.61 kilometers (1 mile) of this project by the University of California at Los Angeles (UCLA) Archaeological Information Center on February 7, 1992.

The UCLA records search identified six archaeological sites and one isolated artifact have been recorded within one mile of the project, however, these resources would be out of any reasonable range of potential effect. In addition, two archaeological sites (CA-LAn-385 and CA-LAn-389) have been recorded in closer proximity to the proposed project. CA-LAn-385 is located in the vicinity of the midpoint of the project. Recorded in 1969 by Tom King, the site was reported to have burials. Archaeological materials were removed during construction of buildings in 1961.

The other site, CA-LAn-389, is located on the Dominguez Hills overlooking Compton Creek and the Los Angeles River. Recorded by Chartkoff and Gutman in 1969, the site was described as a seasonal village or camp site which had already been effectively destroyed by roads and grading activities. The previous level of disturbance greatly reduces its level of importance and sensitivity of the surrounding area.

Based on the results of the background research, the project study area is considered to be of low sensitivity to potential cultural resources remains, both of a prehistoric and historic nature. The area surrounding previously recorded site CA-LAn-385 may be considered sensitive, however, the location of site CA-LAn-385 itself is out of the APE.

Phase 1 Reconnaissance

In addition to the archival search, a Phase 1 Archaeological Study was undertaken during April of 1992 by the Historical, Environmental, Archaeological, Research, Team (H.E.A.R.T.). The results of the archaeological field reconnaissance revealed no surface evidence of prehistoric or historic archaeological resources within the project Area of Potential Effects. Even though the field survey failed to substantiate the existence of site CA-LAn-385, the fact that burials were present in addition to possible features suggests a substantial resource. Therefore, the proposed project APE is considered to contain no known important pre-historic or historic archaeological resources, with the possible exception of the area in the vicinity of CA-LAn-385.

3.3.2.2 Evaluating Significance of Archaeological Resources

Since the field survey failed to substantiate the existence of site CA-LAn-385, and identified no other important pre-historic or historic archaeological resources within the APE of the proposed project, no sites appear to qualify for consideration for the National Register under Criteria for Evaluation D at this time. This finding of ineligibility was submitted for review by the SHPO on September 23, 1994 and the SHPO concurred with findings of ineligibility in its letter of October 27, 1994 (see Appendix F).

3.3.3 Historic and Architectural Resources

3.3.3.1 Locating Historic and Architectural Resources

A field survey of all properties within the Area of Potential Effects of the proposed project was undertaken according to Caltrans guidelines and procedures.

Field Survey Method

The field survey of historic and architectural resources was undertaken from June 7, 1994 to June 12, 1994 and included the following steps:

- A field survey consisting of a visual on-site examination of every parcel within the APE.
- Identification of the age of all major buildings, structures, objects and coherent districts located within the APE.
- Photography of each district feature, major structure, building or object within the APE.
- Review of previous surveys, comments from interested parties and lists of important historic properties.
- Background historical research, including Assessor's Records, historic Sanborn Insurance Company maps and City Directories.

- Cataloging of the above information and preparation of:

  historic resources inventory forms for all intact structures built prior to 1945; abbreviated inventory forms for all altered pre-1945, moved pre-1945 or post-1945 structures; and a list of all undeveloped, utility, or railroad right-of-way parcels,

- Preliminary identification of structures appearing eligible for listing on the National Register of Historic Places.

3.3.3.2 Evaluating Significance of Historic and Architectural Resources

In order to evaluate properties for inclusion in the National Register of Historic Places, the Criteria for Evaluation were applied according to the guidelines set forth in National Register Bulletin 15. A context statement was prepared to identify research themes, including: early settlement; growth and development along the Alameda Corridor; Native American, Hispanic, and Black ethnic heritage; development of railroad transportation, both freight and passenger; development of the oil drilling and refining industries; residential architecture; and industrial architecture. The context statement is presented in the *Historic Architectural Survey Report* prepared for this project.

The field work analysis was supplemented by site specific research to determine original owners, tenants, architects and builders associated with the property. A complete description of background research and field investigation results are contained in the *Historic Property Survey Report* and the *Request for Determination of Eligibility Report* completed for this project and incorporated herein by reference.

For the proposed project, the historic architectural survey evaluated four individual resources and one district within the APE which would require further consideration under Section 106. One building is listed in the National Register of Historic Places. As a result of the survey undertaken for this project, three properties and one district were found to appear to meet the criteria for listing in the National Register. Two districts, eleven other properties, and four bridges were evaluated and found not to meet the criteria for listing in the National Register. All other remaining buildings, structures and objects within the APE have either lost substantial integrity of their historic fabric through alteration or relocation, or are less than 50 years of age, and possess no other overriding significance. Of these, fifty buildings were constructed before 1945 but were substantially altered, one building was constructed before 1945 but was moved, and ninety-eight buildings were constructed after 1945 and possessed no overriding significance. Nineteen other bridges were inventoried, and were found to be examples of common types not appearing eligible to the National Register at this time. The remaining 100 properties within the APE of the proposed project were either undeveloped, or contained utilities such as flood control devices, transmission lines, railroad tracks, or oil wells, none of which appeared to meet National Register criteria for evaluation.

The historic properties requiring compliance with Section 106 are listed below. Additional information about ineligible properties is included in the *Historic Property Survey Report* and *Historic Architectural Survey Report* prepared for this project.

Historic and architectural properties previously listed in the National Register

- Rancho Dominguez Adobe and Museum



Figure 3-1: Rancho Dominguez Adobe, 18127 S. Alameda Street: Top, Dec 29, 1888 (Seaver Center, L.A. Co. Museum of Natural History in Grenier, 1987); Middle, 1894 (Los Angeles Public Library in Grenier, 1987).

The ***Rancho Dominguez Adobe and Museum***, located at 18127 South Alameda Street, Los Angeles County, was listed in the National Register of Historic Places on May 28, 1976 and was designated as California Historical Landmark No. 152. It was listed under Criterion C at the State level of significance in the area of architecture over the period 1825-1849. Built about 1827 by Manuel Dominguez, the present appearance of the adobe is the result of a Mission Revival remodeling and expansion undertaken in 1906 by architect George Riccard and contractor R. L. Bell.

In 1784 Juan Jose Dominguez, a member of the Portola expedition of 1769, received a Spanish land grant to the 29,945 hectares (74,000 acre) Rancho San Pedro - one of the first three great California ranchos along with those granted to Jose Verdugo and Manuel Nieto. Juan Jose Dominguez had been under the command of Pedro Fages at the San Diego Presidio and was part of the Portola expedition of 1769, and when Fages became Governor in 1782 he began making plans to reward his best soldiers. The Rancho San Pedro was named after the bay discovered by Juan Cabrillo in 1542 and extended from Redondo to the Palos Verdes peninsula and included the present-day Palos Verdes Estates, Rancho Palos Verdes, Rolling Hills Estates,

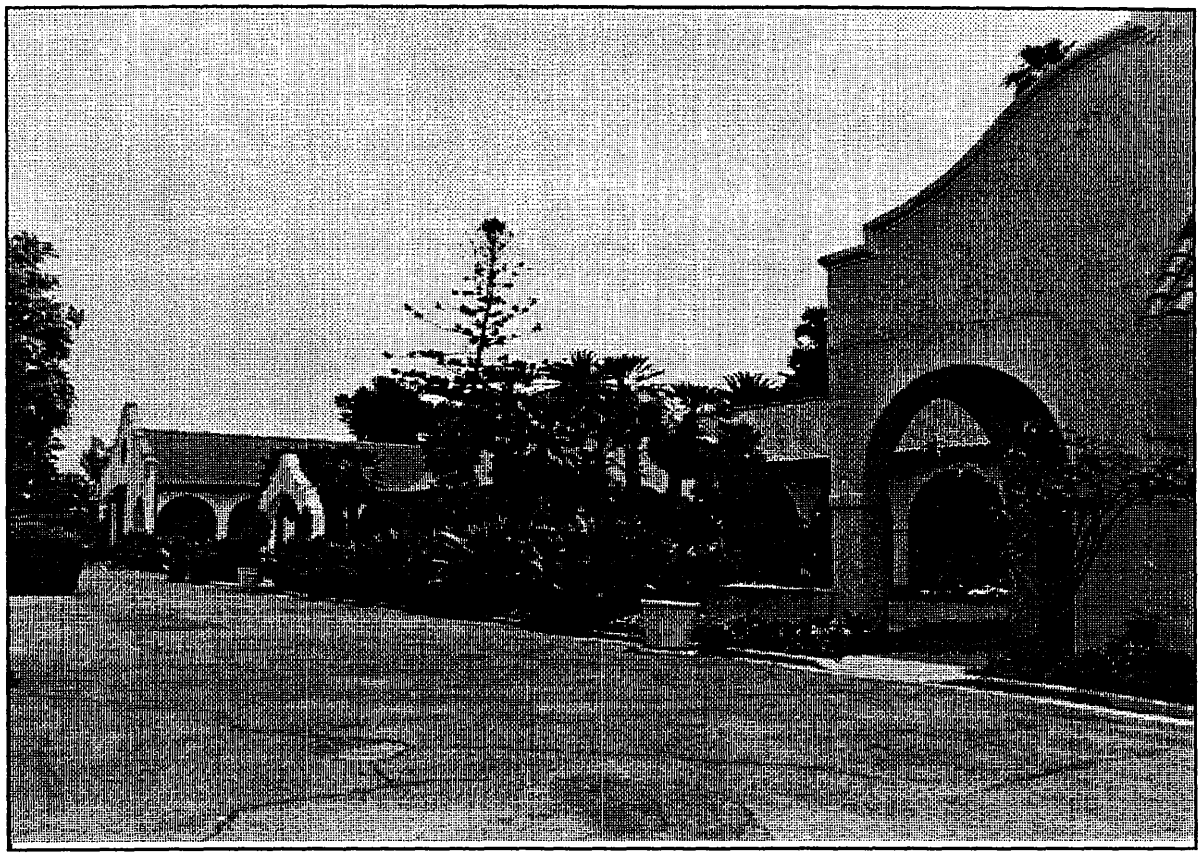


Figure 3-2: Rancho Dominguez Adobe, 18127 S. Alameda Street in 1994.

San Pedro, Torrance, Gardena, Compton, Redondo Beach, Wilmington, Lomita, Harbor City and Carson. In return for the grant, Juan Jose Dominguez was obligated to build and maintain a house, keep at least two thousand head of cattle, and hire sufficient vaqueros for the herd. Early in 1785 Dominguez moved his herd from San Diego and built a two-room adobe house, corral and accessory buildings near a spring of fresh water, near present day Alameda and Carson streets. Although the original adobe was abandoned and left to ruin, considerable portions of the walls were still evident as late as 1902. Father Patrick of the Claretian Seminary remembers the location of the original adobe surviving until the 1930s near what is now the Blue Line, but also that it was subsequently demolished and covered by an industrial complex. By 1805 Rancho San Pedro was relatively prosperous and supported over 6,000 head of livestock, mostly horses and cattle.

Upon his death in 1809, Juan Jose Dominguez left the Rancho to his nephew Jose Cristobal Dominguez, who in turn passed 3,238 hectares (8,000 acres) of it on to his son Don Manuel Dominguez, who built a new, larger adobe in 1827. Manuel Dominguez was a prominent Los Angelino, having served as Alcade of Los Angeles (1832), as Mexican Prefect for the Southern District of California (1843), as one of the first Los Angeles County Supervisors (1854) and was one of the signatories of the first Constitution of the State of California (1849). Manuel

Dominguez purchased back portions of the original Rancho San Pedro from his brothers and sisters and continued to retain control of the Rancho until his own death in 1882. After his wife, Maria Engracia Cota de Dominguez died the following year, the then 9,713 hectares (24,000 acre) Rancho San Pedro, was left to the six surviving members of their ten children.

All six of the surviving children of Manuel and Engracia Dominguez were daughters: Maria Victoria had been married to George Henry Carson since 1857, Dolores Simona was the recent widow of James Watson, Ana Josefja Juliana (widow of William Dryden) would soon re-marry Charles Guyer, Susana Delfina would marry Gregorio del Amo y Gonzalez in 1890, and Maria Jesus de Los Reyes would marry John Fillmore Francis in 1892. In 1910, while the aircraft industry was still in its infancy, five of the sisters were on hand to witness their rancho become the stage for the International Air Meet, the first of a series of three of these events held annually at the rancho. The meets were extremely popular, and gained international fame for both Los Angeles and the Dominguez family. The distribution of Rancho San Pedro among these heirs coupled with the discovery of oil over much of the property in the 1920s would ensure continuance of the Dominguez legacy via local place nomenclature, including Carson, Del Amo, Victoria Street, Watson Crossing, Reyes Street, Susana Street, Dolores Street, and of course Dominguez Channel, Dominguez Hills, and California State University at Dominguez Hills.

Use of the Rancho Dominguez adobe grounds was formally transferred to the Claretian fathers in 1924 for a seminary. The adobe of Manuel Dominguez dating back to 1827, is still in excellent condition and appears much like it did in 1906 when a wing was added to form its U-shaped plan and Riccard's Mission Revival gables constructed (See Figure 3-2). Ironically, Mission Revival gables became a popular architectural device in California in the early twentieth century in an attempt to recapture the romance and nostalgia of the early rancho days, and owed their inspiration more to the largely fictitious novel *Ramona* by Helen Hunt Jackson than of actual adobes like that built by Manuel Dominguez.

Historic and Architectural Properties Determined Eligible for Listing in the National Register

- Redondo Junction/ Butte Street Yard

Redondo Junction/Butte Street Yard is a district of four buildings located at 2550 Butte Street, Los Angeles. Constructed by the Atchison, Topeka and Santa Fe (now known as the Burlington Northern Santa Fe Corporation [BNSF]) and Union Pacific Railroads from 1910 to 1924, this complex consists of a roundhouse, office, watchtower, and storage building. The Redondo Junction Roundhouse, along with another in Las Vegas, New Mexico, is one of only two operating roundhouses in the West. The roundhouse is built in a 270° circular plan and is located just west of the Los Angeles River and north of Washington Boulevard. It was built out of concrete without ornamentation by Unit Construction of Santa Fe Railway and the Van Sant-Houghton Company in 1910 and currently services Amtrak locomotives. The concrete gable-on-hipped-roof office building was built about the same period and is still in service. The two-story Prairie style watchtower was constructed in 1924, and is one of the few wood frame switching towers still in operation (See Figure 3-3). The watchtower is relatively unaltered, with some minor changes to the stairway and a probably reversible plywood addition under the stairway. The watchtower may soon be put out of service by Metrolink when the switching mechanism is updated.

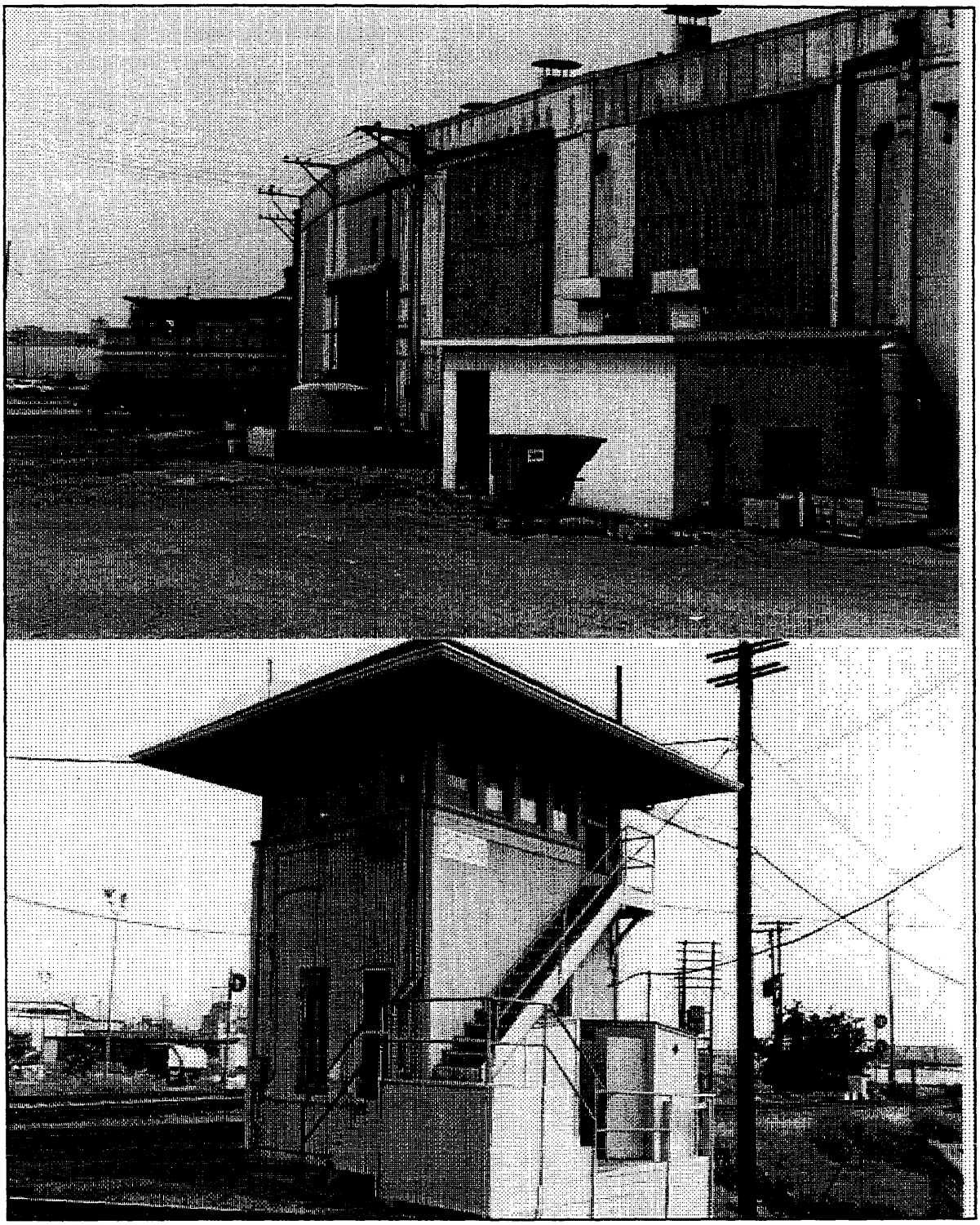


Figure 3-3: Upper photo: Roundhouse and Tower in 1994. Lower photo: Redondo Junction/Butte Street Yard, 2550 Butte Street, Los Angeles.

The Redondo Junction/Butte Street Yard district meets National Register Criteria for Evaluation A and C, for its association with the development of railroad transportation in Los Angeles, and because it embodies the distinctive characteristics of increasingly rare types, a railroad roundhouse, office, and watchtower.

- David Starr Jordan High School

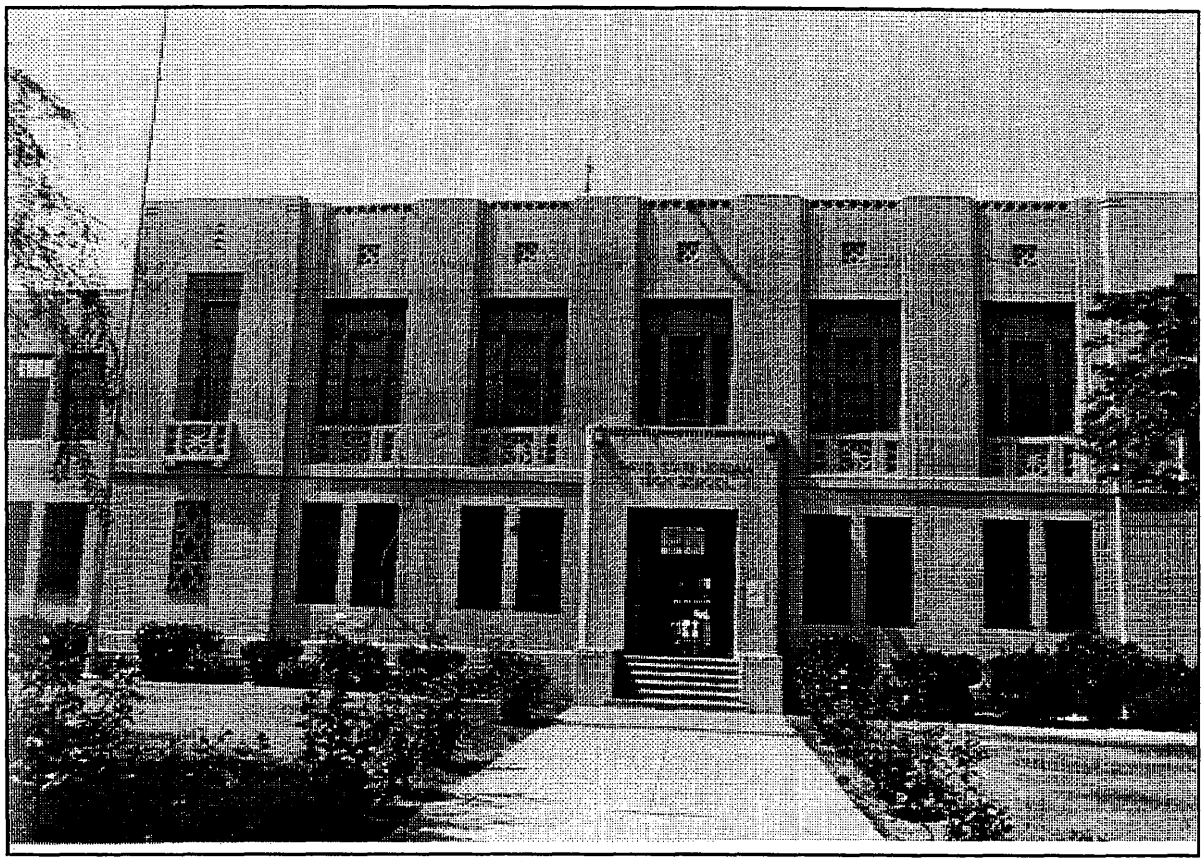


Figure 3-4: David Starr Jordan High School, 2285 East 103rd Street, Los Angeles in 1994.

David Starr Jordan High School, located at 2285 East 103rd Street, Los Angeles has served an ethnically diverse population of students from Watts, Southgate and East Los Angeles since 1925. Jordan High meets National Register Criterion for Evaluation A because it has played a key role in local ethnic history through the educational development of many prominent members of the Black community, including: Charles Dumas, multiple-medal Olympian and presently a teacher at the school; Florence Griffith Joyner, another multiple-medal Olympian; Stanley Sanders, one of three U. S. Rhodes Scholars and former mayoral candidate for the City of Los Angeles; world-renowned jazz artist Buddy Collette; physicist Glen Seaborg and; James Washington of the Dallas Cowboys.

The architecturally important buildings of David Starr Jordan High School were constructed or remodeled during the period from 1927 to 1937, and were designed by Los Angeles architect A. S. Niebecker. The buildings of interest include the administration building (see Figure 3-4), the two classroom buildings to the west and northeast of the administration building, gymnasium and dressing rooms, metal shop, and auditorium building. Jordan High secondarily meets National Register Criterion C at a local level of significance because the buildings constructed before 1937 are excellent examples of the P. W. A. Moderne style of architecture, featuring massive piers and deeply recessed window openings which accentuate the massive quality of the walls. Other school buildings on the east side of the property were added in the early 1960s and are not considered important.

- Watson Station

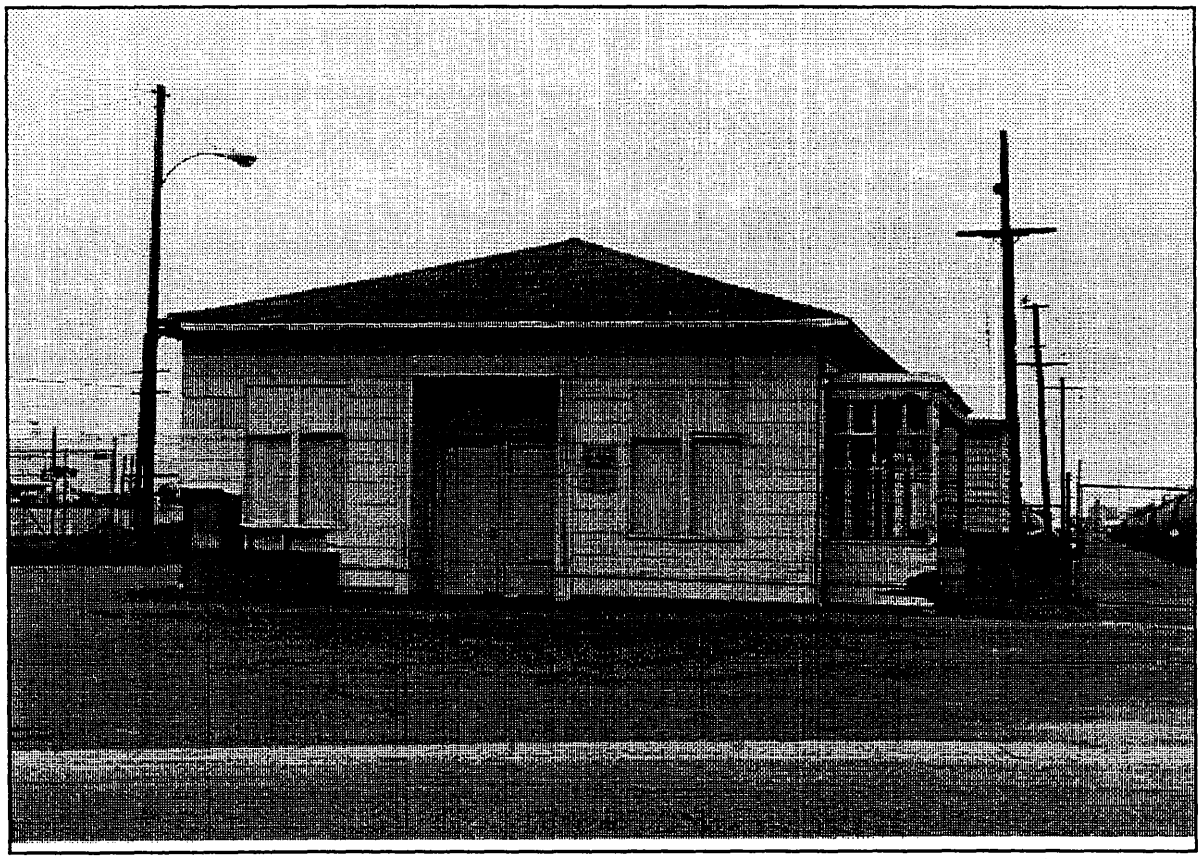


Figure 3-5: Pacific Electric Railway Watson Station, 1850 Sepulveda Boulevard, Wilmington, in 1994.

The ***Pacific Electric Railway Watson Station***, located at 1850 Sepulveda Boulevard in Wilmington served passengers on the San Pedro via Dominguez Line which began service to Wilmington on November 24, 1904 and to San Pedro on July 5, 1905. The Watson Station gained importance for oil workers travelling to the wells discovered and refineries built during the 1920s near Watson Crossing (now part of Sepulveda Boulevard) on the old grazing grounds of the Rancho San Pedro. By the mid 1920s five of the largest refineries in southern California were

located near the Watson Station, and it was considered the largest refinery station in the United States.

The Watson Station has survived in relatively unaltered exterior condition, with only the glass window panes having been replaced with plywood panels, by the removal of several shiplap boards from the northeast corner of the building, and by a 1920s one-story addition to the rear. The one-story wood frame building was originally constructed in a square plan with a rather simple design featuring a hipped roof, horizontally laid shiplap siding exterior wall surface, and regularly spaced sash windows whose lower sash is double the height of the upper (See Figure 3-5). It meets National Register Criterion A at a local level of significance for its association with the development of passenger railway service and oil production, over the period of significance from 1904-1962.

- Ritter Elementary School

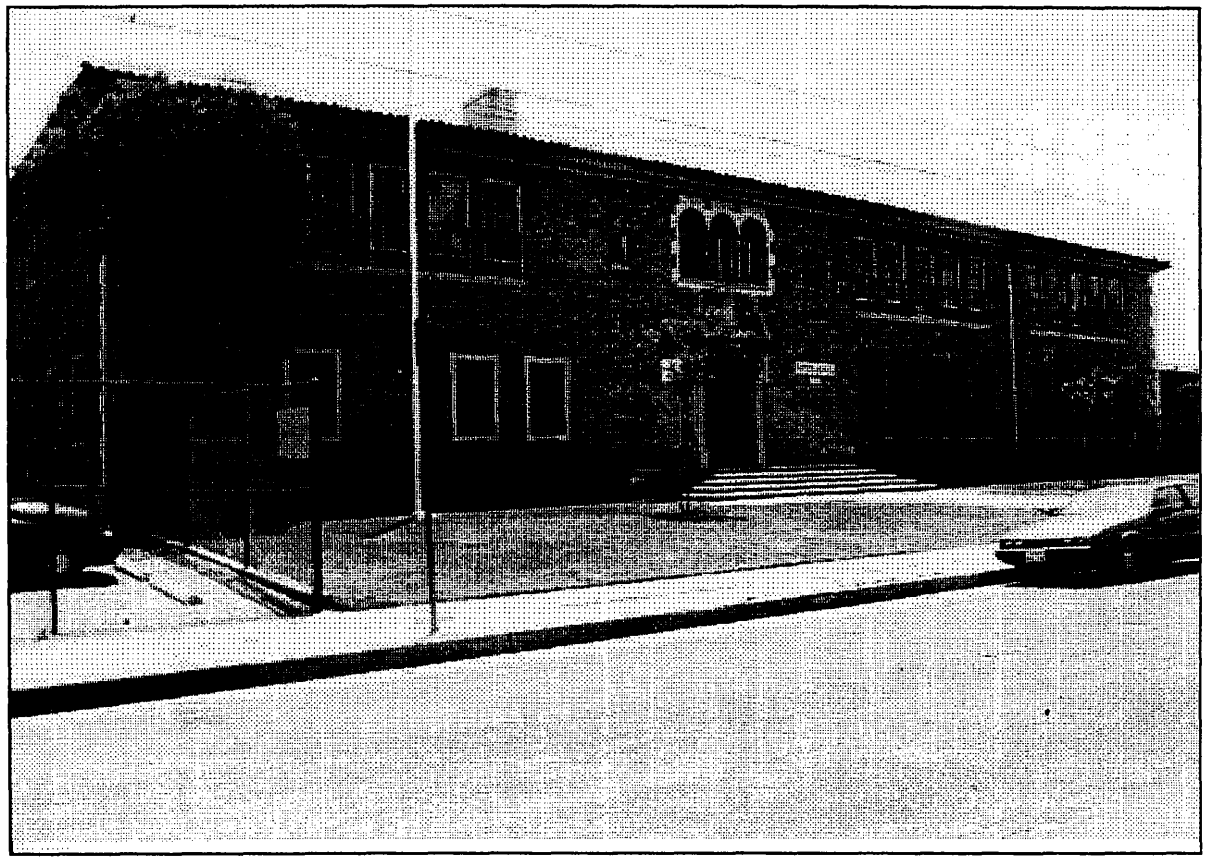


Figure 3-6: Ritter Elementary School, 11108 Watts Avenue, Los Angeles, in 1994.

Ritter Elementary School at 11108 Watts Avenue appears to meet National Register Criterion C as an excellent example of a Renaissance Revival school building. Ritter Elementary features a finely crafted exterior wall surface of polychromatic brick, which is judiciously defined by terra cotta window and entrance surrounds on the first floor, concrete quoins at the corners, and a triple window above the entrance which is accentuated by decorative tile (See Figure 3-6). The

building is built in a simple rectangular plan, topped by a pitched roof protected by red tile. The regularity of this rectangular block, however, is thrown into asymmetry by the rhythm of the fenestration. The centrally located main entrance is flanked to the north by a series of four single window bays with a single bay of five windows above, while the southern end of the facade is broken into two bays of five windows each, and duplicated at the second level. All of the windows are of the double hung sash variety, with the larger sets featuring six-over-six lights and the smaller four-over-four. Brick school buildings, particularly those displaying such fine craftsmanship, are becoming increasingly rare in Los Angeles, largely due to strict seismic upgrade regulations. Constructed in 1929 and surviving in virtually unaltered condition, it appears eligible at a local level of significance.

3.4 HYDROLOGY AND WATER QUALITY

For additional detailed discussion of hydrology and water quality, see Section 4.2 of the EIR.

Precipitation in the Los Angeles area is characterized by intermittent rain during winter months and negligible rain during summer months; 85 percent of the annual precipitation occurs from November to March. Although precipitation normally occurs as rainfall, winter snow is common in the higher elevations of the San Gabriel Mountains. As is typical of many semi-arid regions, the Los Angeles area experiences wide variations in monthly and seasonal precipitation totals.

Precipitation may flow into surface reservoirs or groundwater basins or run off to the ocean. Short-term water storage is in surface reservoirs and long-term storage is in groundwater basins. the amount of infiltration to groundwater basins is dependent upon the slope, soil type and intensity and duration of rainfall. Because most of Los Angeles is either paved and developed or steeply sloped, a great deal of runoff occurs. Structures have been constructed to channel the water safely through inhabited areas to minimize flooding and to aid in recharging water storage units.

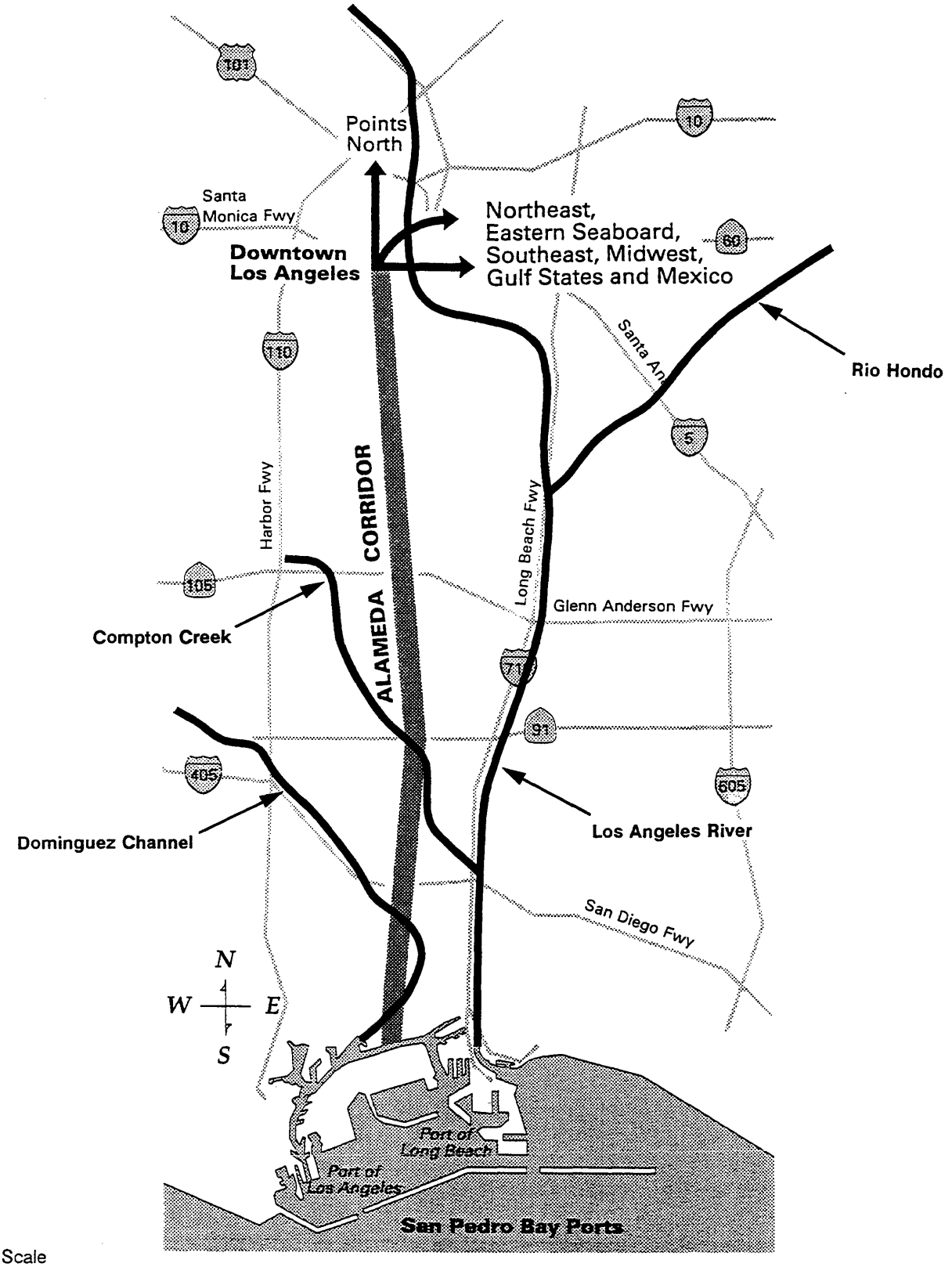
The Los Angeles area is part of the Los Angeles River Basin. The Los Angeles River Basin, as defined in the Basin Plan of the State Water Resources Control Board (SWRCB), involves the coastal areas of Los Angeles County, south of the divide of the San Gabriel Mountains and Santa Susana Mountains, plus a small part of the coastal portion of Ventura County, south of the divide of the Santa Monica Mountains. This basin is drained by four major streams: the Los Angeles River, the Rio Hondo River, Ballona Creek and the San Gabriel River. Numerous tributaries discharge into these major drainages, most of which have intermittent flow. Except for a few rivers in the mountainous areas, most have been converted to flood control channels lined with concrete and stone rip-rap. The drainages pertinent to this project are the Los Angeles River, Compton Creek and Dominguez Channel.

3.4.1 Surface Water Resources

Surface water resources are shown in Figure 3-7 and are discussed below.

- The Los Angeles River

The Los Angeles River, which is channelized for flood control purposes, flows from the southwest side of the San Fernando Valley through the Los Angeles Coastal Plain to the San Pedro Bay. For the most part, the river drains the central Los Angeles area. From the beginning of the river in Calabasas in the San Fernando Valley to the opening between the Santa Monica and Verdugo Mountains, the Los Angeles River is called the Upper Los Angeles River Area. In this area, the river is mainly an unlined channel. In some areas the sides are concrete but the bottom is cobble and sand. With this permeable bottom, some water in the river may permeate to underlying groundwater basins. The river is fed by Arroyo Calabasas, Bell Creek, Aliso Wash, Browns Canyon Wash, Chatsworth Creek, Pacoima Wash, Tujunga Wash and Verdugo Wash. For the most part, these washes and creeks are concrete-lined within the urban areas.



No Scale

Source: National Impact of the Alameda Corridor ACTA, 1994; Myra L. Frank & Associates, 1994

FIGURE 3-7	Surface Water Resources	Alameda Corridor EIS

From the opening between the Santa Monica and Verdugo Mountains to downtown Los Angeles, the Los Angeles River is called the Los Angeles Narrows. Most of this section of the river has a permeable bottom and water may reach underlying groundwater basins. The Arroyo Seco from the northeast merges with the Los Angeles River in this area. Within this area is the Headworks Spreading Grounds, an area where water is allowed to percolate through the soil to the underlying groundwater basin.

The lower section of the Los Angeles River, from downtown Los Angeles to Willow Street in Long Beach, is completely concrete-lined. This section of the river has a low-flow trough built in the center of the channel into which dry weather flows run. This limits the accumulation or "ponding" of water which attracts debris, algae, and nuisance insects. The Rio Hondo merges with the Los Angeles River in this area.

From Willow Street in Long Beach to the San Pedro Bay, the channel is a "mixing zone" where the freshwater of the river and the salt water of the ocean meet. In this section, the river has rip-rap banks and a sediment and rock bottom.

The capacity of the Los Angeles River channel increases with distance from its origin. For example, the downstream design capacity at Los Angeles Flood Control District gaging station 290+00 is 4,134,253 liters per second (146,000 cubic feet per second (cfs)), and the upstream design capacity at gaging station 300+00 is 3,964,352 liters per second (140,000 cfs). Until recently the U.S. Army Corps of Engineers (USACOE) regarded this flow as adequate for the 100-year flood event, but the USACOE is in the process of revising this position. The revised required capacity being considered at gaging station 290+00 would be 5,153,658 liters per second (182,000 cfs), and the revised required capacity at gaging station 300+00 would be 4,643,955 liters per second (164,000 cfs). These figures indicate that the USACOE believes there may be a shortfall in capacity in the event of a 100-year storm.

Flows in the Los Angeles River are highly variable. Based on average daily flows from water years (October to September) 1980 through 1985 at the Los Angeles County Flood Control District sampling location at Firestone Boulevard, the average daily dry season flow rate was 3,337.98 liters per second (117.88 cfs). Dry season flows are comprised chiefly of excess irrigation water applied in urban areas, controlled release of reservoirs, municipal and industrial wastewater as well as effluent from the Tillman and Los Angeles-Glendale sewage treatment plants.

During the wet season, flows in the Los Angeles River are augmented by storm water runoff which varies with storm duration, intensity and frequency. Storm water runoff from the first storm of the season tends to contain high levels of contaminants, but when storms are frequent, contaminant levels decrease in the storm water runoff. Based on average daily flows from water years (October to September) 1980 through 1985 at the Los Angeles County Flood Control District sampling location at Firestone Boulevard, the average daily wet season flow rate was 11,305.77 liters per second (399.26 cfs).

The Alameda Corridor would cross the Los Angeles River north of Washington Boulevard. This crossing would involve a new three-track railroad bridge immediately north of and adjacent to an existing one-track bridge. Bridge support piers would be constructed in the river and would align with existing piers. This portion of the river is under the jurisdiction of the USACOE.

- Compton Creek

Compton Creek is a minor tributary of the Los Angeles River which joins the river just south of Del Amo Boulevard. The creek was channelized by the USACOE in the 1930s for flood control purposes. The existing capacity of the creek is 464,396 liters per second (16,400 cfs). As mentioned previously, until recently the USACOE regarded this flow as adequate for the 100-year flood event. The corps is in the process of revising this position and the revised required capacity of Compton Creek would be 489,881 liters per second (17,300 cfs). This figure indicates that there may be a shortfall of capacity in the event of a 100-year storm.

The water quality of the creek is generally quite poor because it serves as a outlet for runoff from its urbanized drainage area. The runoff carries pollutants such as oil and grease, which are picked up from parking lots, yards, and cars.

A railroad crossing of the creek at the interchange of SR 91 and Alameda Street would be required, involving either a bridge or a large culvert. This portion of Compton Creek has rip-rap sides and a soft bottom and is under the jurisdiction of the USACOE.

- Dominguez Channel

The Dominguez Channel begins in the City of Hawthorne north of the Hawthorne Municipal Airport. It flows south through Gardena and Torrance and eventually enters the Los Angeles Harbor at the East Basin. The channel has a soft bottom and rock sides.

As with Compton Creek, water within Dominguez Channel is generally of poor quality because it carries polluted runoff from the surrounding industrial area. Due to the industrial uses in the surrounding area, it is possible that the Dominguez Channel may have received contaminated materials in the past and therefore may contain contaminated sediments. This possibility has been alluded to by the Los Angeles County Flood Control District, although the exact nature and extent of this potential contamination has not been defined.

The Dominguez Channel would be crossed at three locations: within the existing freight rail yard along Alameda Street between I-405 and Sepulveda Boulevard, near Denni Street and at Henry Ford Avenue. Dominguez Channel is under the jurisdiction of the Los Angeles County Flood Control District. The U.S. Coast Guard does not classify the Dominguez Channel as a navigable waterway.

Floodplains

Two sources identifying floodplains within the project area were reviewed. These included Flood Insurance Rate Maps (FIRMs) prepared by the Federal Emergency Management Agency and the Los Angeles County Drainage Area Review study completed by the USACOE.

The current FIRMs for Los Angeles County indicate that the area in the immediate vicinity of the Dominguez Channel crossing at Henry Ford Avenue is within Zone B, which is defined as the area between the limits of a 100-year and 500-year flood. The remainder of the corridor (outside of the drainage channels) lies within Zone C, areas of minimal flooding.

According to the USACOE report, in the project vicinity, the area south of Rosecrans Avenue lies within a 100-year flood zone. The potential for flooding along the corridor diminishes to a 200-year flood zone to the north of Rosecrans Avenue (see Figure 3-8). Flood descriptions (100-year flood and 200-year flood) refer to their statistical projected frequency. For example, a 100-year flood is the size flood that has a one percent chance of occurring each year. A 200-year flood has a 0.5 percent chance of happening in any year. Upon completion of the USACOE improvements described above, the corridor south of SR 91 would no longer be in a flood zone. The area north of Rosecrans Avenue would continue to be in a 200-year flood zone.

USACOE maps show average flood depths for relatively large areas to estimate dollar damage to assist in determining the cost effectiveness of alternative flood control improvements considered in the Los Angeles County Drainage Area (LACDA) study. The Federal Emergency Management Agency's (FEMA's) FIRMs consider more specific flood depths for smaller areas in order to make certain that the rates one would pay are consistent with the risk one would face. Hence, between the two, the USACOE maps are likely to be more conservative, or identify greater risks, when compared to FEMA's maps.

As discussed above, the USACOE has identified inadequacies in the existing flood control system. According to a USACOE report, strong storms in 1980 revealed that the LACDA flood control system is seriously deficient in some areas of the main Los Angeles and Rio Hondo channels. On the Los Angeles River, problems were greatest downstream from downtown. This report recommended improvement of the Rio Hondo channel south from the Whittier Narrows Dam to its intersection with the Los Angeles River and then continuing southward on the Los Angeles River to San Pedro Bay.

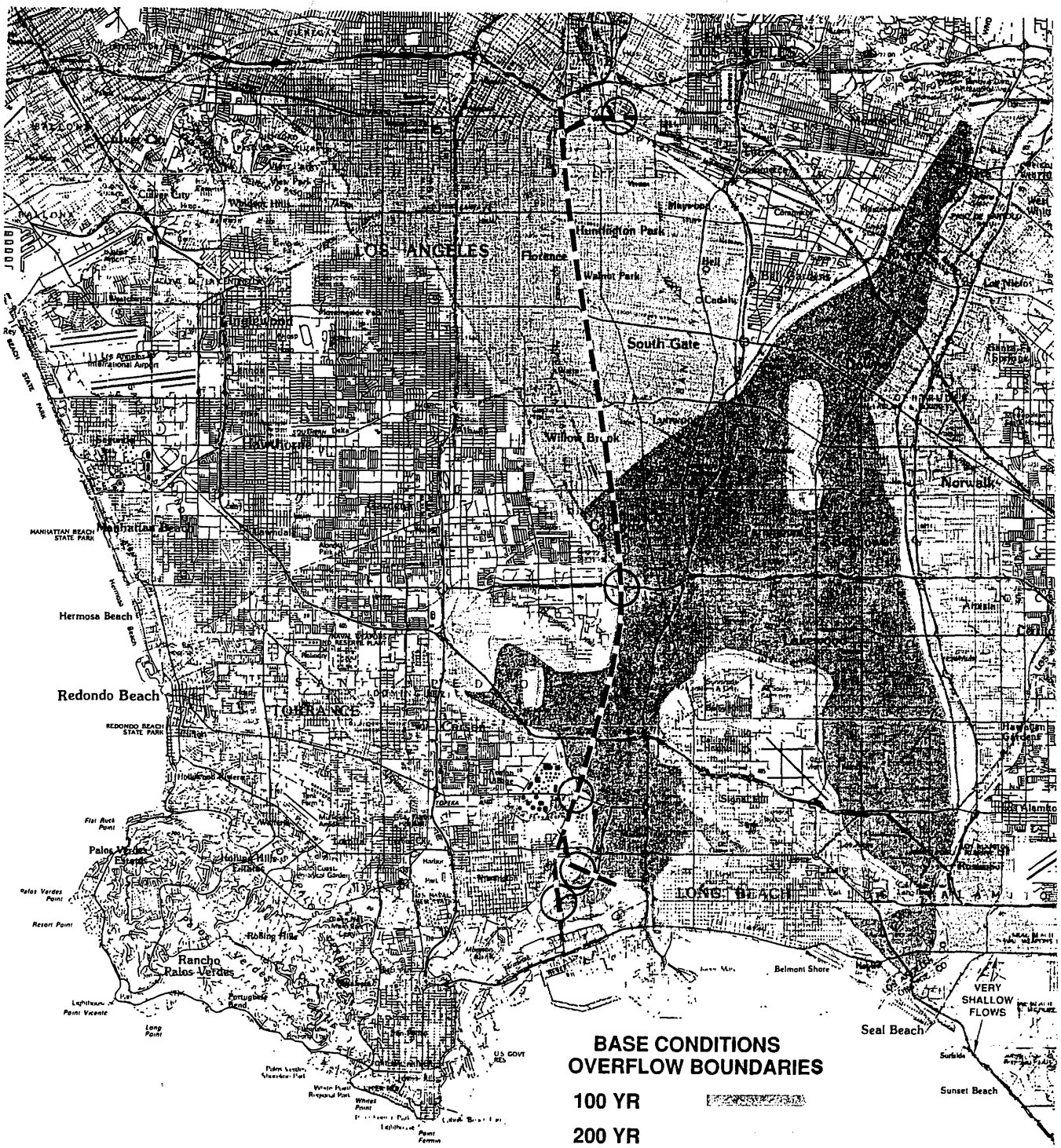
Beneficial floodplain values typically include fish, wildlife, plants, open space, natural beauty, scientific study, outdoor recreation, agriculture, aquaculture, forestry, natural moderation of floods, water quality maintenance and groundwater recharge. Due to the highly urbanized nature of the area, the floodplain attributes in the project study area are such that typical beneficial values either do not exist or exist only in a marginal sense.

3.4.2 Groundwater Resources

Groundwater resources are shown in Figure 3-9 and are discussed below.

Freshwater permeates soils to varying degrees, depending on the composition of the soil. Coarsely grained, sandy, or gravelly strata comprise individual aquifers. These water-bearing deposits are readily capable of absorbing, storing, transmitting and yielding water to wells. Fine-grained sediments, such as silts and clays, are interbedded with the aquifers and form aquicludes which limit the transmission of water out of the aquifer. The aquicludes form discrete boundaries, and the aquifers may merge and coalesce with adjacent aquifers.

One or more permeable layers underlie groundwater basins. Basin boundaries do not necessarily coincide with drainage basins and are derived from political boundaries, surface features and/or geologic features such as faults, non-waterbearing rocks and natural or artificial divides in the water table surface. The elevation of groundwater varies with the amount of pumping and the amount of recharge occurring. Groundwater basins may be recharged naturally through percolation of precipitation or artificially with imported water or reclaimed water.



= Alameda Corridor

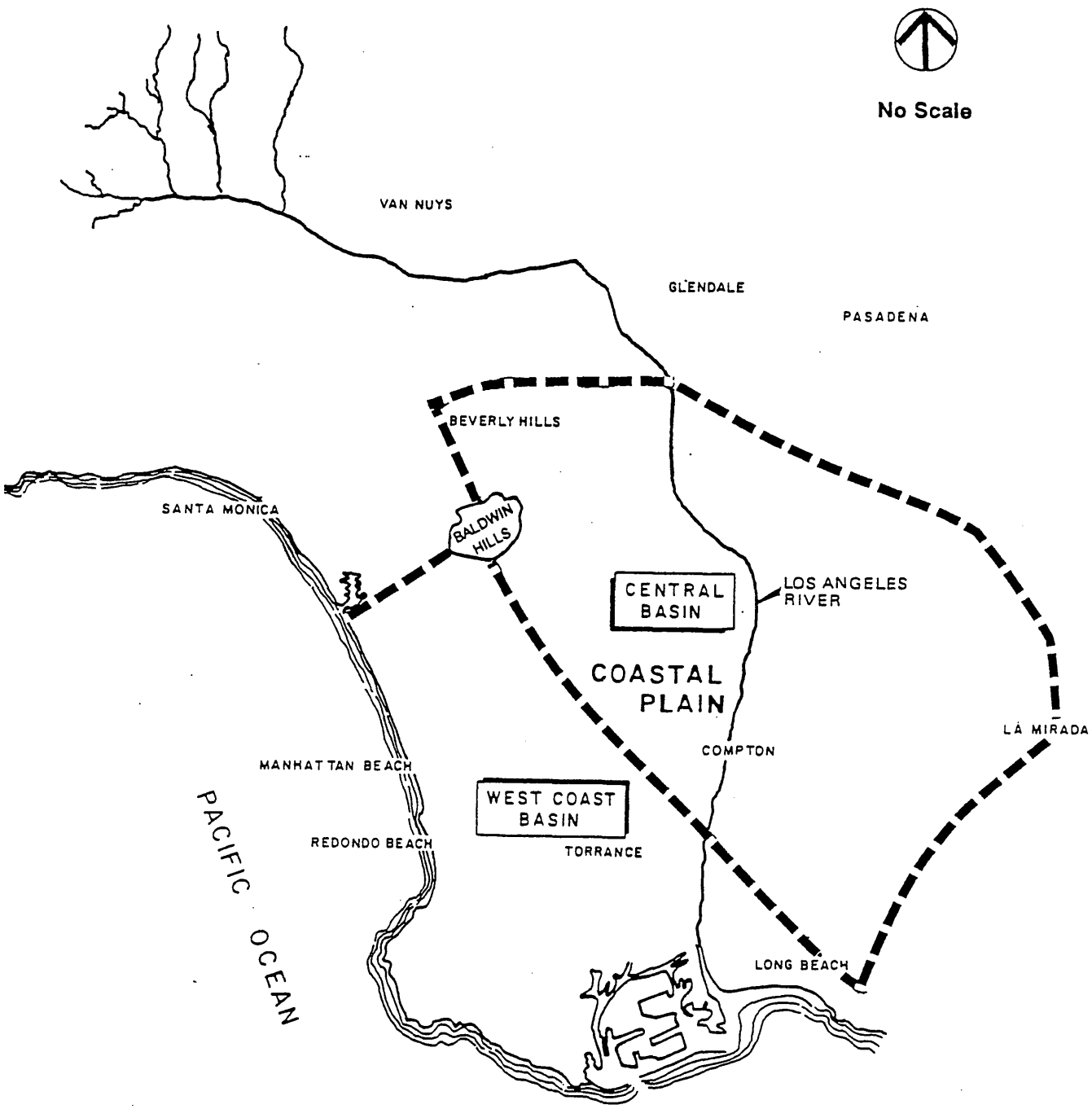
= Stream Crossings. According to FEMA's flood Insurance Rate Maps, the 100-year flood plain is contained within each of the channels except for the southernmost Dominguez Channel crossing where a small area south of and outside of the channel is within the 100-year flood plain.

Source: USACOE, 1987; FEMA, 1980-1987.

Miles 0 1 2 3

Kilometers 0 1 2 3

FIGURE 3-8	Area in the Los Angeles County Drainage Area Threatened by 100 and 200-Year Floods	Alameda Corridor EIS



Source: Myra L. Frank & Associates, 1992.

FIGURE 3-9	Groundwater Resources	Alameda Corridor EIS

Artificial recharge with imported water is practiced as a means of offsetting declining groundwater levels and providing storage for use in times of drought.

The groundwater basins of the Los Angeles Coastal Plain are incorporated into the Coastal Plain Hydrographic Subunit. The Coastal Plain Hydrographic Subunit contains the Central, West Coast, Santa Monica and Hollywood basins. The most important of these, with respect to the proposed project, are the Central and West Coast basins.

- Central Basin

The Central Basin extends over much of the Coastal Plain and holds most of its groundwater. Groundwater occurs within alluvium, Lakewood Formation and San Pedro Formation sediments. These sediments contain several very permeable layers of aquifers.

Groundwater enters the basin through percolation of precipitation, stream flow, and artificial recharge in spreading grounds such as those located along the Rio Hondo and San Gabriel Rivers. Groundwater movement within the basin is toward pumping depressions located in the Vernon area and at the point where the Los Angeles River crosses the Newport-Inglewood Fault. Some groundwater moves across the fault, replenishing the West Coast Basin. 24,040 hectare-meters (194,900 acre feet) of water were extracted from the basin between July 1, 1986 to June 30, 1987, for use as municipal potable supply. All extractions of water are monitored by the Department of Water Resources.

- West Coast Basin

This basin occupies the area west of the Newport-Inglewood Fault and south of the Ballona Escarpment to the south of the Ballona Wetlands. Groundwater occurs in the same soil formation as in the Central Basin. Freshwater replenishment occurs as a result of subsurface flows from the Central Basin and from an injection well system. Because of its location immediately adjacent to the ocean, over-pumping has caused severe sea water intrusion into the basin. An injection well system, which injects freshwater into the basin, was installed to raise groundwater levels along the coast to above sea level in order to prevent sea water intrusion. This well system is maintained to prevent deterioration of the basin's water quality. A groundwater ridge is formed by this injection well barrier, and water flows westerly, toward the ocean, and southeasterly, toward a pumping depression along the Los Angeles River between the San Diego Freeway and Sepulveda Boulevard. Municipal water extractions from this basin between July 1, 1986, and June 30, 1987, consisted of 6,009 hectare-meters (48,720 acre feet) of water.

3.5 HAZARDOUS MATERIALS

Hazardous materials are relevant to the Alameda Corridor project in two distinct ways: 1) construction of the project may be affected by hazardous materials that exist within the proposed corridor in the form of soil or ground water contamination and 2) operation of the project may affect public health through the accidental release of hazardous materials in transit along the corridor. For additional detailed discussion of hazardous materials, please see sections 4.1 and 5.6 of the EIR.

3.5.1 Construction Setting

The corridor containing the proposed project has been in use for many years as a transportation corridor. Land uses existing along the corridor are and have historically been predominantly industrial, and in many cases require the use of, or result in the creation of, hazardous materials as part of their normal daily operations. In some cases, these materials may have been discarded, spilled or leaked, thereby contaminating the soil and ground water.

Information for this section was obtained from two Phase I Environmental Site Assessments and a Phase II Environmental Site Investigation prepared to assess the potential for encountering hazardous materials within the vicinity of the Alameda Corridor. The first phase I report, completed by MAA Engineering Consultants in 1991, was performed as part of the preparation of the Environmental Impact Report for the Alameda Corridor project. The subsequent phase I and phase II reports were prepared by Leighton and Associates in 1993 as part of negotiations concerning the potential acquisition of right-of-way for the project from the Southern Pacific Transportation Company (SPTC).

The Leighton reports are the most recent assessments of hazardous materials deposition in the immediate vicinity of the corridor and thus serve as the primary source of information for this discussion. However, the Leighton reports are limited to the portions of the corridor to be included in the proposed right-of-way and do not include the elements of the project east of the SPTC J Yard and south of the Thenard Wye along Henry Ford Avenue. For these sections of the corridor the MAA report was used. The segment of the corridor that extends north on the east side of the Los Angeles River from Olympic Boulevard to the SP Pasadena Junction is not covered in any of the reports.

The Leighton Phase I Environmental Site Assessment developed an initial set of locations having the potential for containing hazardous materials through:

- a visual reconnaissance of businesses adjacent to the right-of-way suspected of generating hazardous materials;
- a focused reconnaissance of the right-of-way to document visible areas of surface contamination and potential sources;
- a search of government agency databases for sites within 305 meters (1,000 feet) of the project including: potentially contaminated sites; hazardous waste generators; treatment, storage and disposal facilities; and active and inactive landfills;
- a review of local government agency files from: Cal EPA, Regional Water Quality Control Board-Los Angeles region, Los Angeles County Department of Public Works, Long Beach Fire Department, Lynwood Fire Department, Los Angeles City Fire Department, Vernon Fire Department and Vernon Environmental Health Department;

- a review of SPTC spill reports from 1970 to the present; and
- a review of Environmental Impact Reports for adjacent projects.

The data gathered from the above sources were then analyzed and ranked in relation to the potential for soil or ground water contamination according to the following system:

Ranking	Description
0	No visual evidence of hazardous materials storage, usage or production in excess of about 37.85 liters (10 gallons), or on-site disposal.
1	Reported or visual identification of hazardous materials storage, usage or production in excess of about 37.85 liters (10 gallons), but no evidence of on-site disposal; OR reported contaminated soil or ground water that has been remediated to the satisfaction of the appropriate regulatory agency.
2	Reported soil or ground water contamination that has not been satisfactorily remediated but does not appear to affect the right-of-way.
3	Reported or visual identification of soil or ground water contamination that has not been satisfactorily remediated and that may affect the right-of-way.

The Leighton phase I report identified 51 locations within or adjacent to the right-of-way that received a rank of 3, indicating that there is evidence of soil or ground water contamination that may affect the right-of-way. Table 3-4 identifies these locations and describes the nature of the contamination. Figure 3-10 illustrates the locations of these sites. Two of the locations obtained from SPTC spill records did not specify a location and thus do not appear in Figure 3-10.

The MAA Preliminary Environmental Assessment developed an initial set of potentially contaminated locations within 1,219 meters (4,000 feet) of the project through a search of nine state and federal databases. This list was then narrowed to locations within 122 meters (400 feet) of the project by a field check. The narrowed list was then screened on the basis of field reconnaissance, aerial photographs and information from the database search to develop a set of 46 high priority locations that were anticipated to have the greatest potential affect on the proposed project. Of these 46 locations, 6 were located in areas of the corridor not covered by the Leighton phase I report. Table 3-4 identifies these locations (numbers 50 to 55) and describes the nature of the contamination. The locations are illustrated in Figure 3-10.

From the locations identified as having the potential to affect construction activities, 33 locations occurring in five clusters are apparent: 1) a set of 5 locations in the vicinity of SPTC's J Yard near 25th Street and Alameda Street in Los Angeles, 2) a set of 4 locations just north of Slauson Avenue in Vernon, 3) a set of 3 locations near Imperial Highway in Lynwood, 4) a set of 14 locations south of the I-405 (San Diego) Freeway in Carson and 5) a set of 7 locations near the SR-47 (Terminal Island) Freeway in Long Beach. Based on records research and visual assessment, nearly all of the identified locations were found to have some form of contamination resulting from petroleum products (mostly fuel spills). Other forms of contamination identified along the corridor include volatile organics (5 locations), heavy metals (3 locations), lead (2 locations) and asbestos (1 location).

TABLE 3-4: SUMMARY OF LOCATIONS WITH POTENTIAL HAZARDOUS WASTE

NUMBER	NAME	LOCATION	CITY	NATURE OF CONTAMINATION
1	Southern Pacific J Yard	J Yard; west of Alameda Street at 25th Street	Los Angeles	Soil contamination from diesel fuel spill
2	Southern Pacific Rail Line	Intersection of 25th Street and Alameda Street	Los Angeles	Soil contamination from petroleum product spill (diesel fuel)
3	Los Angeles By-Products	1810 25th Street	Vernon	Known soil contamination from heavy metals
4	Southern Pacific Rail Line	Alameda Street between 27th Street and 38th Street	Vernon	Soil contamination from diesel fuel
5	Antiquarian Traders/Utility Appliance Corp.	4851 Alameda Street	Vernon	Suspected soil contamination from petroleum products
6	Pan Metals Corp./Ray Metals/ Docummon Metals Co.	4890 Alameda Street	Vernon	Soil contamination from petroleum hydrocarbons (waste oil), volatile organics (solvents), and scrap metals
7	Southern Pacific Rail Line	Alameda Street between 51st Street and 55th Street	Vernon	Soil contamination from petroleum products (diesel fuel)
8	Southern Pacific Rail Line	Alameda Street between 57th St. and Slauson Ave	Vernon	Soil contamination from petroleum products (diesel fuel)
9	Former La Victoria Salsa Bottling Facility	SE corner of Alameda Street and 74th Street	L.A. County	Soil contamination from petroleum products (diesel fuel)
10	Southern Pacific Rail Line	Intersection of 92nd Street and Alameda Street	South Gate	Soil contamination from petroleum products (diesel fuel)
11	Vacant Lot/Caltrans Project Site 25	2601 Imperial Highway	Lynwood	Soil and ground water contamination from petroleum products, lead, heavy metals, and aromatic volatile organics
12	Phoenix Distributors	11711 Alameda Street	Lynwood	Soil and ground water contamination from petroleum products and volatile organics
13	Martin Metal Finishing	12150 Alameda Street	Compton	Soil and ground water contamination from petroleum products and volatile organics
14	Southern Pacific Rail Line	305 meters (1,000 feet) north of Rosecrans Avenue	Compton	Soil contamination from propylene glycol
15	Electrosheen	1300 Alameda Street	Compton	Known soil contamination from heavy metals
16	Witco/Southwest Petro-Chem	19530 Alameda Street	Rancho Dominguez (L.A. County)	Soil and ground water contamination from volatile organics (solvents) and petroleum hydrocarbons
17	Southern Pacific Rail Line	West of 2410 Dominguez Street	Carson	Soil contamination from petroleum products (lubricating oil)
18	Southern Pacific Dolores Yard	2442 Carson Street	Carson	Soil and perched ground water contamination from petroleum products
19	Common Market Container Service/Alameda Street Landfill	22700 Alameda Street	Carson	Suspected soil and ground water contamination from a multitude of contaminants
20	Johns Manville, Plot 11	South of 223rd Street on each side of rail line	Carson	Soil contamination from asbestos

TABLE 3-4: SUMMARY OF LOCATIONS WITH POTENTIAL HAZARDOUS WASTE

NUMBER	NAME	LOCATION	CITY	NATURE OF CONTAMINATION
21	Unknown contaminant source, possible underground pipeline	31 meters (100 feet) south of Dominguez Channel	Carson	Soil contamination from petroleum products
22	Texaco Sulfur Recovery Plant and Parking Lot	23208 Alameda Street	Carson	Known ground water contamination from petroleum hydrocarbons, also some liquid phase petroleum products
23	Arco Refinery/Arco Training and Credit Union and Parking Lot	1801 Sepulveda Boulevard/ 1907 Sepulveda Boulevard	Carson	Soil and ground water contamination from petroleum products, also some liquid phase petroleum products
24	Air Products Specialty Gas	23320 Alameda Street	Carson	Known ground water contamination from petroleum hydrocarbons, also some liquid phase petroleum products
25	Unknown contaminant source, possible underground pipeline	Between Dominguez Channel and Sepulveda	Carson	Soil contamination from petroleum products
26	Hargrove Dump/Arco Coke Gasification Plant	North of Alameda Street, east of Sepulveda Blvd./23500 Alameda Street	Carson	Known ground water contamination from petroleum hydrocarbons, also some liquid phase petroleum products
27	Truck Scales/Railroad Office	1805 Sepulveda Boulevard	Carson	Known ground water contamination from petroleum hydrocarbons, also some liquid phase petroleum products
28	Shell/Unocal Refinery	2000 Sepulveda Boulevard	Carson	Known ground water contamination from petroleum hydrocarbons, also some liquid phase petroleum products
29	Gatx Carson Refinery	2000 Sepulveda Boulevard	Carson	Soil and ground water contamination from petroleum products, liquid phase petroleum product plume at 55 feet below ground
30	Southern Pacific Dolores Yard	1850 Sepulveda Boulevard	Carson	Known ground water contamination from petroleum hydrocarbons, also some liquid phase petroleum products
31	Texaco Tank Farm	1926 Pacific Coast Hwy 2101 Pacific Coast Hwy	Carson	Known ground water contamination from petroleum hydrocarbons, also some liquid phase petroleum products
32	Huntway Asphalt Plant	Alameda Street	Wilmington	Soil contamination from petroleum products
33	Stained sand adjacent to right-of-way	61 meters (200 feet) north of O Street	Wilmington	Foundry sand
34	Department of Water and Power Tank Farm	12200 Alameda Street	Wilmington	Known ground water contamination from petroleum hydrocarbons, also some liquid phase petroleum products
35	Unknown adjacent business (Mozingo/Morico Steel Co.)	91 meters (100 yards) east of McDonough Avenue	Wilmington	Soil contamination from petroleum products

TABLE 3-4: SUMMARY OF LOCATIONS WITH POTENTIAL HAZARDOUS WASTE

NUMBER	NAME	LOCATION	CITY	NATURE OF CONTAMINATION
36	Pacific Electric Right-of-Way	I Street	Wilmington	Soil contamination from petroleum products (waste oil)
37	Falcon Refuse Center	3031 I Street	Wilmington	Suspected soil and ground water contamination from a multitude of contaminants
38	Pacific Electric Right-of-Way	I Street	Wilmington	Soil contamination from petroleum products (waste oil)
39	Long Beach Iron Works	2100 Anaheim Street	Long Beach	Soil and ground water contamination from lead, may also be contaminated with petroleum products
40	Southern Pacific Rail Line	Edison Street	Long Beach	Soil contamination from petroleum products (jet fuel)
41	Southern Pacific Rail Line	1355 8th Street	Long Beach	Soil contamination from petroleum products (diesel fuel)
42	Area west of right-of-way	Alameda Street between Flint Avenue and East G Street	Los Angeles	Soil contamination from petroleum products (diesel fuel)
50	TCL Corporation	420 Henry Ford Avenue	Wilmington	Possible groundwater contamination from underground tank; site targeted for cleanup
51	Mobil Station	410 Henry Ford Avenue	Wilmington	Groundwater contamination— pollution characterization in progress
52	Industrial Wire Products Co.	2417 23rd Street	Los Angeles	Potentially hazardous site
53	EKCO Metals	1700 Perrino Street	Los Angeles	Soil contamination, tank leak— pollution characterization in progress
54	Flo-Tronic Metal Manufacturing Inc.	2885 Washington Boulevard	Los Angeles	Potentially hazardous site
55	Stinnes-Western Chemical Corp.	3270 Washington Boulevard	Vernon	Soil and groundwater contamination, tank leak— pollution characterization in progress
–	Unknown location	Unknown	Unknown	Soil contamination from diesel fuel spill (Southern Pacific spill records)
–	Unknown location	Unknown	Carson	Soil contamination from diesel fuel spill (Southern Pacific spill records)

Source: Leighton and Associates, 1993; MAA Engineering Consultants, 1992; Myra L. Frank and Associates, Inc., 1994.

The Leighton Phase II Environmental Site Investigation included a field sampling program within the corridor right-of-way that included:

- 116 1.52 meter (five-foot) deep hand-auger borings;
- 53 hollow-stem-auger borings between 4.57 and 12.19 meters (15 and 40 feet) deep;
- 117 soil gas samples between 0.91 and 4.57 meters (3 and 15 feet) deep; and
- three ground water samples.

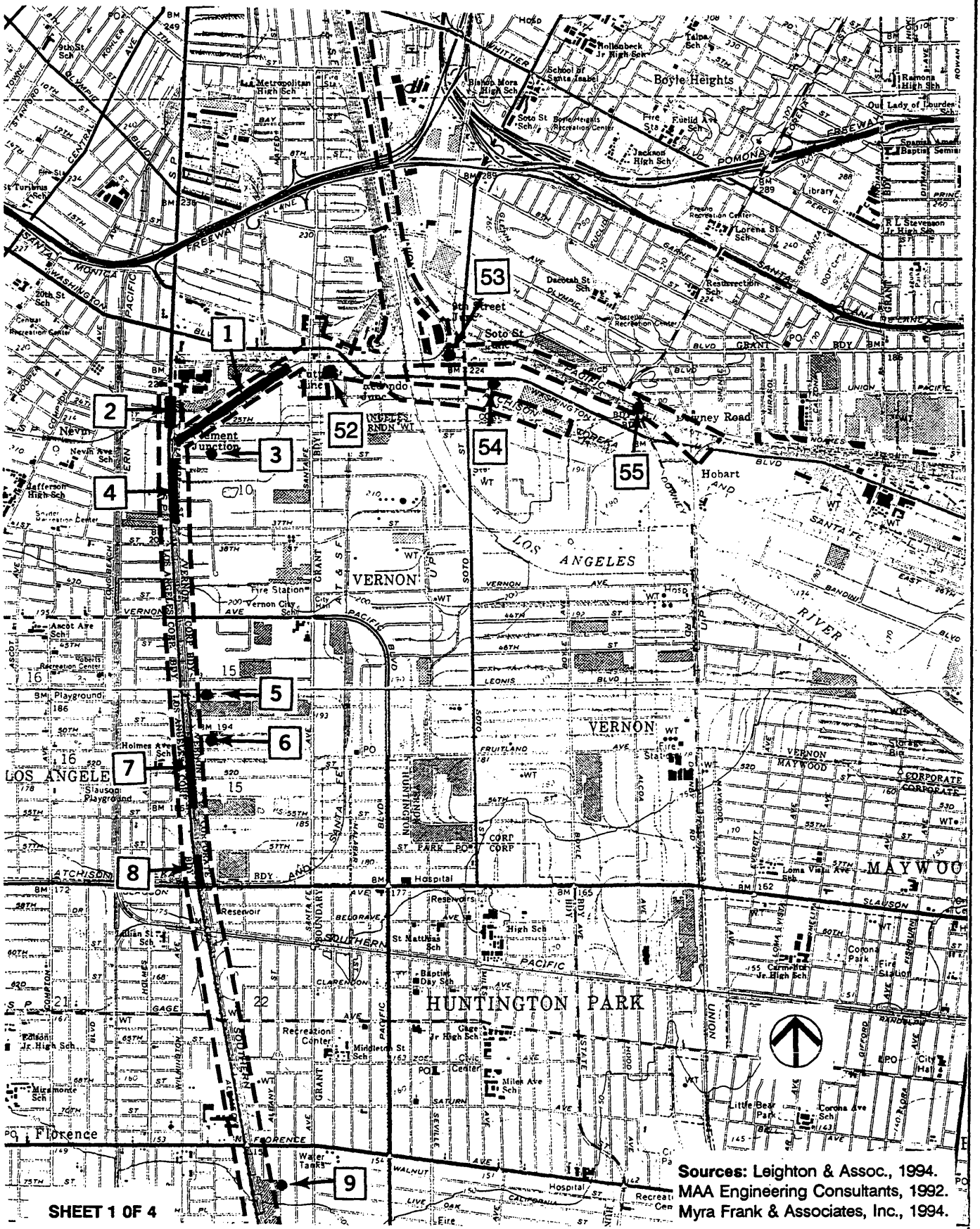
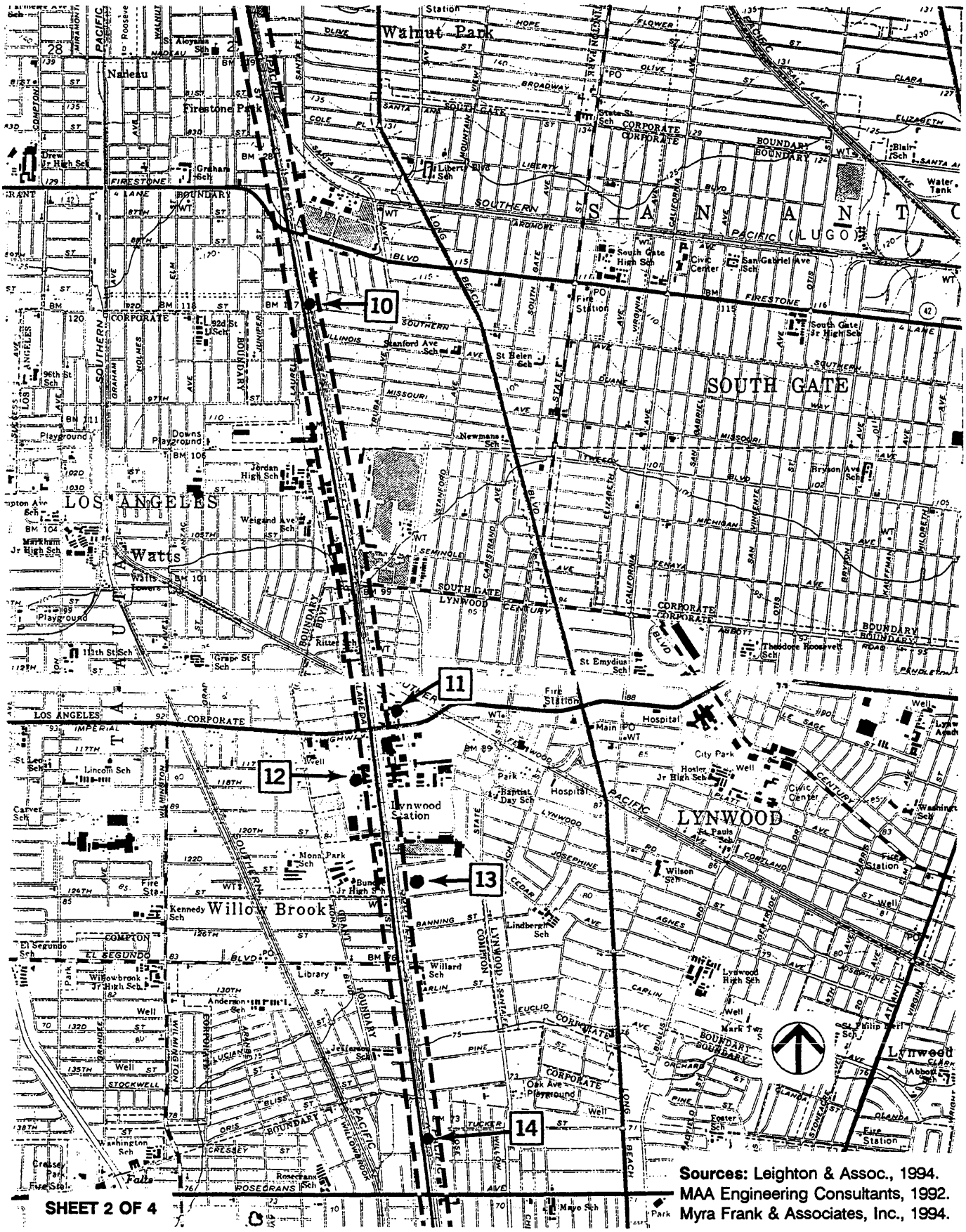


FIGURE 3-10

Hazardous Waste Sites That May Affect The Alameda Corridor

ALAMEDA CORRIDOR EIS



Sources: Leighton & Assoc., 1994.
MAA Engineering Consultants, 1992.
Myra Frank & Associates, Inc., 1994.

FIGURE 3-10	Hazardous Waste Sites That May Affect The Alameda Corridor	ALAMEDA CORRIDOR EIS

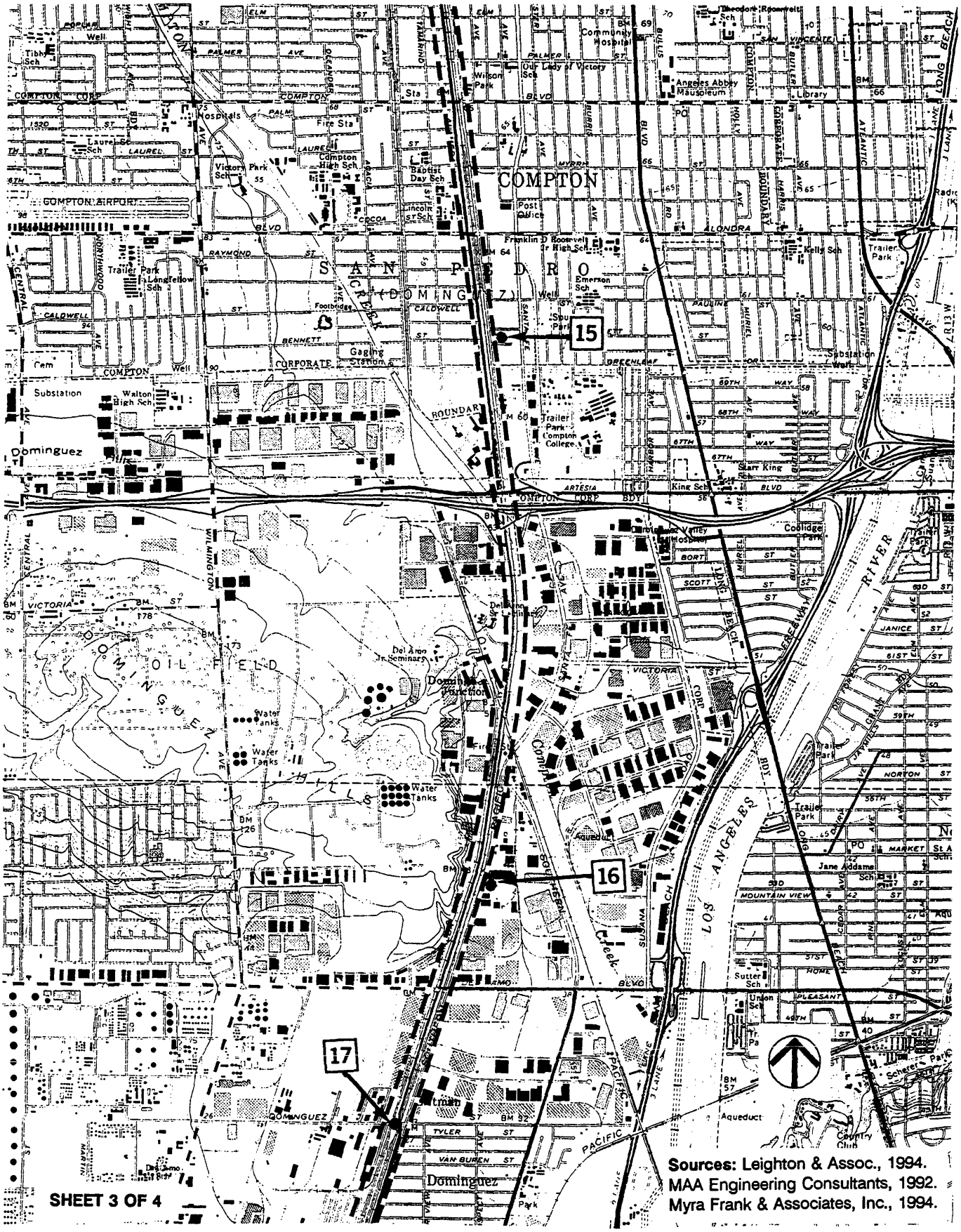
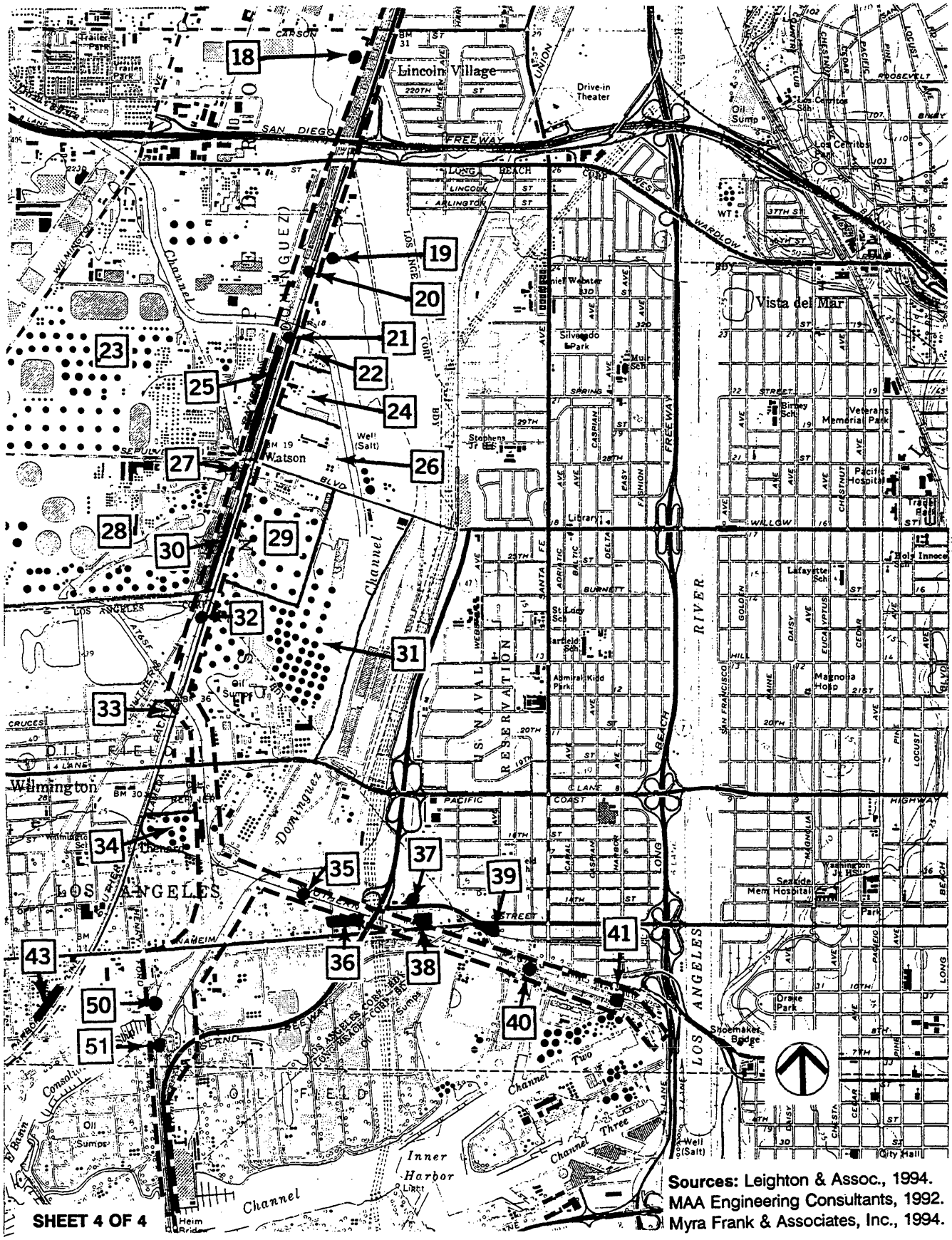


FIGURE 3-10	Hazardous Waste Sites That May Affect The Alameda Corridor	ALAMEDA CORRIDOR EIS



Sources: Leighton & Assoc., 1994.
MAA Engineering Consultants, 1992.
Myra Frank & Associates, Inc., 1994.

FIGURE 3-10	Hazardous Waste Sites That May Affect The Alameda Corridor	ALAMEDA CORRIDOR EIS

These samples were then analyzed for petroleum hydrocarbons, heavy metals, volatile organics and semi-volatile organics. The following general areas of concern have been identified:

- petroleum hydrocarbon contamination in the Vernon cluster, between Kansas Avenue and Missouri Avenue in South Gate, and near the Electrosheen site in Compton;
- presence of heavy metals along the corridor in relatively small amounts;
- PCE (tetrachloroethene) contamination in the J-Yard cluster;
- BTEX (benzene, toluene, ethylbenzene, xylenes) contamination near the Dolores Yard site and between Kansas and Missouri avenues in South Gate; and
- chlorinated volatile organic compound (VOC) contamination south of the Vernon cluster, near site 18 (Dolores Yard), and in the Carson cluster.

The field sampling conducted as part of the Phase II Environmental Site Investigation provides a general characterization of the contamination within the right-of-way and is not intended to serve as a comprehensive analysis.

3.5.2 Operational Setting

Train access to the Ports is currently provided by four routes (see Figure 2-7): the ATSF Harbor Subdivision, SP Wilmington Branch, SP San Pedro Branch and UP San Pedro Branch. The proposed project would consolidate all train movement to and from the Ports onto the SP San Pedro Branch. Existing and projected train volumes to and from the Ports are shown in Table 3-5. Presently, approximately ten percent of freight rail cars moving through the region carry materials classified as hazardous. It is estimated that of the containers shipped through the Port of Long Beach, five to ten percent contained hazardous liquids such as fuels and chemicals. Data obtained from the EPA's Emergency Response Notification System tabulated railroad spills from the SP railroad along the Alameda Corridor from 1985 to 1991. The number of train movement spills per year for the corridor have been as shown below:

Year	Number of Spills
1985	0
1986	0
1987	2
1988	0
1989	0
1990	3
1991	2

TABLE 3-5: PORT TRAIN VOLUMES PER DAY

YEAR	SP	UP	ATSF
1990	17	8	3
2020/NO BUILD	39	34	24
2020/WITH PROJECT	2020/NO BUILD VOLUMES MOVE TO ALAMEDA CORRIDOR (93)		

Source: ACTA, 1994.

According to U.S. Department of Transportation/Federal Railroad Administration data, the most common causes nationwide for train accidents involving hazardous materials in 1990 were as follows (a total of 90 cars involved):

- mechanical and electrical failures involving "truck components" (19 cars);
- mechanical and electrical failures involving "axles and journal bearings" (18 cars);
- track, roadbed and structures involving "frogs, switches, and track appliances" (12 cars)
- track, roadbed and structures involving "rail and joint bar defects" (5 cars); and
- "collisions with highway user at crossing site" (5 cars).

Data on rail accidents in general, and rail accidents involving releases of hazardous substances in particular, are incomplete. It may reasonably be concluded, however, that although the frequency of such accidents is low, at the same time the risk to public health resulting from any one accident could be potentially serious.

The number of people living along the Alameda Corridor is limited, with residential development comprising only four percent of the adjacent land uses. For the entire length of the corridor, the population living within 152 meters (500 feet) is estimated to be 7,400; within 305 meters (1,000 feet), the population is estimated to be 26,200. Since the corridor is presently used for the transport of hazardous materials by both freight rail and trucks, the risk of an accidental release of hazardous materials already exists within the corridor.

3.6 VEGETATION AND WILDLIFE

Please refer to Section 4.7 of the EIR for additional detailed discussion of Vegetation and Wildlife.

The Los Angeles region is primarily urbanized and dominated by paved surfaces and landscaping. The region is arid with highly seasonal rainfall occurring primarily in winter. Native vegetation has been largely replaced by urban landscaping and the intrusion of exotic species, although remnants of the native vegetation of the Los Angeles Coastal Plain occur on some hillsides. In undeveloped but disturbed urban areas, flora and fauna consist of native and non-native species that are tolerant of disturbances. Typical species found include pigeons, rodents, gulls, eucalyptus, palms, and iceplant. Correspondence with the U.S. Fish and Wildlife Service is provided in Appendix F.

Drainages

The Alameda Corridor crosses three drainage channels: the Los Angeles River, Compton Creek and Dominguez Channel.

- **Los Angeles River**

The Los Angeles River, which parallels much of the corridor, flows from the southwest side of the San Fernando Valley through the Los Angeles Coastal Plain to the San Pedro Bay. The river is channelized and concrete lined for most of its length. In the upper portions of the river, the bottom is not lined, allowing vegetation to grow in the river bottom. Further down the river, vegetation is found growing in areas of debris accumulation. Other organisms found in the river are those associated with warm, nutrient-rich, slow-moving waters such as algae and insects. The mixing zone of the river with the ocean begins near Willow Street in Long Beach. In this area, the river is not lined; many species associated with disturbed habitats are found there, including common varieties of many birds and fish. No wetlands or special aquatic sites exist in this channel within the project study area.

The proposed project crosses the Los Angeles River north of Washington Boulevard. The river does not support vegetation at this location.

- **Compton Creek**

The Alameda Corridor crosses Compton Creek south of State Route 91. This portion of the creek has lined banks and a soft bottom. The creek supports a disturbed wetland dominated by castor bean (*Ricinus communis*), tules (*Scirpus* sp.), cattails (*Typhus* sp.) and numerous grass species. Several willow (*Salix* sp.) and ash (*Fraxinus* sp.) trees also occur along the creek bottom. Additional plant species observed include thistle, wild radish (*Raphanus sativus*), telegraph weed (*Heterotheca grandiflora*), fennel (*Foeniculum vulgare*), poison hemlock (*Conium maculatum*), mulefat (*Baccharis salicifolia*), cocklebur (*Xanthium spinosum*), common morning glory (*Ipomoea purpurea*), western ragweed (*Ambrosia psilostachya*), white sweet clover (*Meliotus alba*) and cudweed (*Gnaphalum* sp.).

Cliff swallows (*Hirundo pyrrhonota*) and starlings (*Sturnus vulgaris*) were observed over the creek. In addition, red-winged black birds (*Agelaius phoeniceus*), a black-crowned night heron (*Nycticorax nycticorax*) and a great blue heron (*Ardea herodias*) were observed foraging in the creek. Cliff swallow nests were not observed on any of the bridges at this location.

- **Dominguez Channel**

The Alameda Corridor crosses the Dominguez Channel at three locations near its southern terminus. The channel has lined sides and a soft bottom. In addition, the channel is under tidal influence at these locations. There are no wetlands or sensitive biological resources associated with these portions of the Dominguez Channel.

Applicable Rules and Regulations

The federal Endangered Species Act of 1973 (as amended), the State of California's endangered species legislation of 1970 (California Administrative Code, Title 14) and the California Fish and Game Code require the U.S. Fish and Wildlife Service (USFWS) and the California Department of Fish and Game (CDFG) to list all species threatened with extinction. The USFWS lists species in the Federal Register and the CDFG lists species in California Administrative Code Title 14. In addition, the California Department of Fish and Game Natural Diversity Data Base (NDDB) lists species considered sensitive by the scientific community, though this listing offers no legal protection. The NDDB identifies the location and status of a species by recording observations.

Sensitive habitats are also identified by the USFWS and CDFG. The California Coastal Act of 1976 defines a sensitive habitat as an area in which plant or animal life or their habitats are either rare or especially valuable because of their special nature or role in an ecosystem, and which would be disturbed or degraded by human activities and development.

Evidence of coordination with the USF&WS is provided in Appendix F of this EIS. The USF&WS responded to the Notice of Preparation that was issued for the CEQA document, indicating in part that listings of federally protected as well as state-listed species and the potential effects on such species should be included in the environmental document. The NDDB (see next section) was used to identify possible federal or state species, and the result was that the least tern was the only threatened or endangered species potentially to be found in the study area. The USF&WS was asked to participate in the present NEPA process as a cooperating agency (see letter from FHWA to USF&WS dated January 24, 1994, Appendix F) but did not reply. On January 12, 1995, Mr. Jack Fancher of the USF&WS was contacted and he confirmed the fact that no additional federally protected species had been listed in the time period between the CEQA document and the present EIS.

Threatened and Endangered Species

The NDDB identified one species, the California least tern (*Sterna antillarum browni*), in the study area (within 1.61 kilometer (one mile) of the corridor) which is listed as endangered under both Federal and State Endangered Species Acts .

The California least tern is a migratory bird species which feeds in the waters of bays and nests on a protected nesting area on Terminal Island from April until August. Port of Los Angeles records indicate that in 1990, 32 pairs of the least tern nested in the Terminal Island area, and

in 1991, 2 pairs nested. In 1992, no pairs nested; in 1993 there were 10 pairs; and in 1994 there were 31 pairs. Terminal Island lies outside of the project limits.

Other NDDB Listed Species

In addition to the species listed above, the NDDB has also identified one Candidate 2 species (candidate for federal listing as endangered or threatened) by the USFWS within the proposed project corridor. The NDDB lists a sighting of the San Diego horned lizard (*Phrynosoma coronatum blainvillii*) in the City of Compton at the junction of Rosecrans Avenue and the Southern Pacific Railroad right of way. The NDDB does not list a date for the sighting and indicates that the species is possibly extirpated at the site.

Additional species identified by the NDDB and other sources as having the potential to occur in the vicinity of the Alameda Corridor include: bright green dudleya (*Dudleya virens*), Los Angeles sunflower (*Helianthus nuttallii* ssp. *parishii*), Parish's smallscale (*Atriplex parishii*), Lyon's pentacheata (*Pentacheata lyonni*), aphanisma (*Aphanisma blitoides*), Mexican flannel bush (*Fremontodendron mexicanum*), California gnatcatcher (*Polioptila californica*), tiger beetle (*Cicindela hirticolis gravida*), monarch butterfly (*Danaus plexippus*) and Palos Verdes blue butterfly (*Glaucopsyche lygdamus palosverdensis*). These species all require habitats (chaparral, coastal sage scrub, salt marsh) not found along the project corridor and would not be affected by the proposed project.

CHAPTER 4

ENVIRONMENTAL CONSEQUENCES

4.0 IMPACTS AND MITIGATION

4.1 INTRODUCTION

For purposes of this EIS, the environmental analyses previously prepared for the EIR (see Chapters 4 and 5) were reexamined to determine what the relationship would be between the effects associated with the locally preferred alternative (Alternative 2.1B) and the effects of previously documented Alternative 2.1A. The primary physical differences between these two alternatives are: (a) Alternative 2.1B would provide four traffic lanes along Alameda Street rather than the six lanes which would have been provided under Alternative 2.1A, (b) Alternative 2.1B would provide left turn pockets at several additional intersections that were not included under Alternative 2.1A and (c) Alternative 2.1B would entail several minor design modifications in selected locations that differ from Alternative 2.1A. A comparison was made of the effects associated with the two alternatives, with the following conclusions being drawn:

- For all topics analyzed in the EIR for which there were adverse effects, the effects associated with Alternative 2.1B were found to be equal to or less than those associated with Alternative 2.1A.

- For all topics analyzed in the EIR for which there were beneficial effects, the effects associated with Alternative 2.1B were found to be equivalent to those associated with Alternative 2.1A.

- For all topics analyzed in the EIR for which a no effect conclusion was drawn, the same conclusion was drawn for Alternative 2.1B as had been drawn for Alternative 2.1A.

- For the topics receiving additional analysis and documentation in response to NEPA requirements in this EIS, based upon parallel analyses and documentation presented in the EIR, the same impact determinations applied between the two alternatives.

- Based upon the overall comparison between the two alternatives, and taking into account the additional analysis and documentation required under NEPA, Alternative 2.1B would still emerge as the locally preferred alternative.

Sections 4.2 through 4.6 of this chapter provide the additional environmental documentation/ analysis required under the National Environmental Policy Act (NEPA) for air quality, cultural resources, hydrology and water quality, hazardous materials and vegetation and wildlife. Section 4.7 summarizes and/or modifies the discussion of other impacts provided in the EIR as they apply to the currently proposed locally preferred alternative. Sections 4.8 through 4.10 provide additional impact discussions/summaries required under NEPA. The No Build Alternative is also discussed in each of these sections.

4.2 AIR QUALITY

Sections 4.2.1 through 4.2.3 of this EIS summarize the analysis contained in the EIR (see Section 4.3) with regard to construction impacts, regional emissions and air toxics. Pursuant to NEPA and recent Federal air quality regulations (see EIS, section 3.2), the topic of localized emissions has been reexamined. EIS Sections 4.2.4 and 4.2.5 provide the results of the reexamination of localized emissions and a discussion of the project in the regulatory context; Section 4.2.6 provides a discussion of proposed mitigation measures.

4.2.1 Construction Impacts

The reader is referred to section 4.3.3 of the EIR for a detailed discussion of construction impacts. The effects discussed below for the locally preferred alternative (Alternative 2.1B) would be essentially the same as have been described for EIR Alternative 2.1A, since the magnitude of the construction effort would be nearly the same.

Construction emissions were estimated for the project for a range of construction operations and processes, ranging from utility relocation to constructing soundwalls. From this range of construction processes and operations, a prototypical construction segment, 1.6 meters (one mile) in length, was hypothesized, within which three construction steps (excavation, railroad track construction, street restoration) having the highest emission characteristics were assumed to be underway. Emissions were calculated for the various pieces of construction equipment that would be operating in the construction segment, and the results were compared with thresholds to determine whether the effects would be substantial, such thresholds being defined by the South Coast Air Quality Management District (SCAQMD). Emission factors were taken from the SCAQMD CEQA Handbook (April, 1993). In order to estimate regional effects, it was assumed that a worst case construction year, defined as two prototypical segments being under construction at the same time, should be analyzed. The results of the analysis, for criteria emissions and fugitive dust, are shown in Tables 4-1 and 4-2, respectively. As is shown in the tables, based on the SCAQMD thresholds, the construction impacts for reactive organic gases, nitrogen oxides and fugitive dust would be considered substantial.

TABLE 4-1
EXHAUST EMISSIONS FROM
CONSTRUCTION-RELATED ACTIVITIES [KG/DAY (LBS/DAY)]

POLLUTANT	SCAQMD THRESHOLDS	PROPOSED PROJECT
Carbon Monoxide	249 (550)	54 (119)
Reactive Organic Gases	25 (55)	43 (94)
Nitrogen Oxides	25 (55)	134 (295)
Sulfur Oxides	68 (150)	13 (29)
Particulate Matter (<10 μm)	68 (150)	10 (23)

Note: Emission rate calculations provided in the Air Quality Impact Analysis Technical Report (Radian, 1992). Emissions assumed to occur 8 hrs/day. Emission factors taken from SCAQMD CEQA Handbook, 1993.

Source: Radian, 1992; MFA, 1994.

TABLE 4-2
FUGITIVE DUST (PM_{10}) EMISSIONS FROM CONSTRUCTION-RELATED ACTIVITIES [KG/DAY (LB/DAY)]

ACTIVITY		PROPOSED PROJECT
Truck Travel:	Unpaved Roads	211 (466)
	Paved Roads	106 (234)
Wind Erosion of Storage Piles		3 (6)
Dirt Pushing/Bull-dozing		3 (6)
Dirt Piling/Material Handling		73 (162)
Grading		189 (416)
Total		585 (1,270)

Notes: Emission rate calculations provided in the Air Quality Impact Analysis Technical Report (Radian, 1992). Emissions assumed to occur 8 hrs/day at two locations. SCAQMD threshold is 68 kg/day (150 lbs/day).

Source: Radian, 1992; MFA, 1994.

Construction emissions were also evaluated for localized impacts, using air dispersion models approved by EPA and SCAQMD. The Industrial Source Complex (ISC2) model was used to estimate PM_{10} (the primary pollutant of concern) impacts due to construction emissions. Worst case meteorological data were used.

Construction-related PM_{10} emissions were modeled for a prototypical segment near the intersection of Alameda Street and Tweedy Boulevard. This location was chosen because of its close proximity to Jordan High School, one of the closest schools to Alameda Street.

The results of the PM_{10} modeling indicated that a 24-hour average concentration of 277 $\mu g/m^3$ could be expected at the analysis location. This level would exceed the Federal standard (150 $\mu g/m^3$). If appropriate mitigation were applied, consisting of water spraying of exposed areas, the estimated concentration could be reduced to 139 $\mu g/m^3$, which would be below the Federal standard. Since worst case conditions were assumed at this location, it is likely that the expected results throughout the project area would be less.

4.2.2 Operational Emissions

The reader is referred to section 4.3.4 of the EIR for a detailed discussion of operational emissions. The effects discussed below for the locally preferred alternative (Alternative 2.1B) would be essentially the same as have been described for EIR Alternative 2.1A, since the objective of regional freight rail consolidation would be achieved equally under both alternatives.

Once the project becomes operational, locomotive emissions and vehicular delays at grade crossings would be reduced. Locomotive emissions were estimated for the No Build and 2.1B alternatives using existing diesel engine locomotive emission rates taken from the recently completed Southern California Accelerated Rail Electrification Report (Southern California

Regional Rail Authority [SCRRA], 1992). Based upon planning objectives presented in the recently-issued EPA Federal Implementation Plan, and discussions with EPA technical staff in Ann Arbor, Michigan, the following assumptions were made for year 2020 emission rates: CO and SO_x, no change; NO_x, improved by 70 percent; ROG, improved by 50 percent; PM_{10}, improved by 25 percent. Through trains were assigned to individual track segments based on the railroad operations analysis that was conducted during the concept design effort. This was done independently for the existing, future no project, and future with project cases. Numbers of locomotives (four per train) operating throughout the region were estimated together with operating speeds and throttle notch settings. Total locomotive-miles by throttle notch setting were aggregated, and appropriate emission rates were then applied. The study area used for this analysis extended from the ports to the City of Industry, in order to reflect effects to be expected within the air basin as a result of changes in locomotive routes and operating conditions. The results of this analysis are shown in Table 4-3.

TABLE 4-3
EXISTING AND YEAR 2020 REGIONAL EMISSIONS [KG/DAY (LBS/DAY)]

	CO	NO_x	ROG	PM_{10}	SO_x
LOCOMOTIVE EMISSIONS					
Existing (1990)	57 (125)	1,846 (4,061)	21 (46)	38 (84)	112 (246)
No Project (2020)					
Running Emissions	257 (565)	2,180 (4,796)	69 (150)	75 (165)	445 (979)
Idle Emissions	7 (15)	35 (77)	5 (11)	2 (4)	20 (44)
Total	264 (580)	2,215 (4,873)	74 (163)	77 (169)	465 (1,023)
Consolidated Corridor (2020)					
Running Emissions	272 (598)	1,185 (2,607)	35 (77)	47 (103)	325 (715)
Idle Emissions	4 (9)	21 (46)	3 (7)	1 (2)	12 (26)
Total	276 (607)	1,206 (2,653)	38 (84)	48 (105)	337 (741)
VEHICULAR IDLE EMISSIONS					
Existing (1990)	268 (591)	17 (38)	26 (57)	0.5 (1)	Negligible
No Project (2020)	506 (1,116)	72 (159)	22 (48)	2 (4)	Negligible
Consolidated Corridor (2020)	45 (100)	6 (14)	2 (4)	Negligible	Negligible
Net savings from consolidation (YEAR 2020)	449 (939)	1,075 (2,365)	56 (123)	31 (68)	128 (282)

Source: Myra L. Frank & Associates, 1995.

The analysis presented in Table 4-3 shows that the consolidated corridor would maintain carbon monoxide locomotive emissions at approximately the same level as the no build case, because rail emissions only contribute a small proportion of overall carbon monoxide emissions. However, reductions in all of the remaining pollutants would occur, with nitrogen oxides being cut nearly in half.

On a regional basis, highway vehicle delays occur at grade crossings. It is estimated that approximately 1,900 daily vehicle hours of delay occurred at grade crossings in 1990, along existing rail lines serving the ports. By the year 2020, delays at grade crossings are estimated to increase to approximately 15,900 vehicle hours per day, without the project. Implementation of the proposed project would reduce this delay to an estimated 1,400 vehicle hours daily, with an attendant decrease in associated emissions of criteria pollutants. The reduction in vehicular delays would provide for higher average speeds and associated lower emission rates per mile

traveled. Reductions from emissions resulting from reduced vehicle hours of delay at grade crossings are also shown in Table 4-3.

Taking both locomotive and vehicular emissions into account, the consolidated corridor would result in net reductions in all pollutants analyzed, with the most dramatic benefits being realized for carbon monoxide and nitrogen oxides.

4.2.3 Air Toxics

The reader is referred to section 4.3.6 of the EIR for a detailed discussion of air toxics. The effects discussed below for the locally preferred alternative (Alternative 2.1B) would be essentially the same as have been described for EIR Alternative 2.1A, since the objective of regional freight rail consolidation would be achieved equally under both alternatives.

Federal and state air pollution regulations have historically focused on criteria pollutants (NO_x, SO_2, O_3, particulates, and lead). However in the past decade, there has been growing concern regarding the potential impacts of other harmful "non-criteria" pollutants, which are generally referred to as toxic air contaminants or "air toxics." The health impacts of concern include carcinogenesis, and other adverse health effects. For most chemicals, at low doses few if any adverse health effects would be seen and as the dose is increased, adverse health effects may become evident. The dose is dependent on not only the concentration to which an individual is exposed but also the duration of exposure.

Toxic air contaminants include chemicals such as arsenic, benzene, hexavalent chromium, chloroform and vinyl chloride. Benzene and 1,3-butadiene are the only indicator toxic pollutants emitted in appreciable quantities from mobile source exhaust, and therefore are the only toxic pollutants relevant to the Alameda Corridor project.

Air toxics emitted from mobile sources are regulated by the federal government through the EPA and by the state government through the Air Resources Board. Air toxics are also controlled by regulations for criteria pollutants, since these simultaneously reduce air toxic emissions.

Potential health effects from the long-term exposure from project operation to benzene and 1,3-butadiene are as follows.

Benzene is classified as a known human carcinogen by the EPA. Most of the data supporting this classification is taken from occupational exposures, and therefore it is difficult to determine the actual contribution of benzene to the increased cancer risk seen in workers. Background cancer risk in the SCAB due to ambient levels of benzene is estimated at 650 to 1000 in one million (SCAQMD).

1,3-butadiene is classified as a probable human carcinogen by the EPA, because there is sufficient evidence to show the carcinogenicity of 1,3-butadiene in experimental animals (IRIS). Epidemiological occupational studies of exposure to 1,3-butadiene have been inconclusive, however. Therefore, it is necessary to extrapolate from the high doses administered in experimental studies to estimate the cancer risk in humans. Using this method, the background cancer risk in the SCAB due to ambient levels of 1,3-butadiene (Carey) is estimated at 6,784 in one million.

Implementation of the proposed project is expected to reduce regional emissions of air toxics. It is projected that there will be a net reduction of approximately 0.95 metric tons (1.05 tons)/day of ROG by the year 2020, as a result of improved railroad operating efficiency and reduced vehicle delays at grade crossings. Since it is reasonable to assume that the reduction in ROG would produce a proportional reduction in benzene and 1,3-butadiene emissions, the project is therefore found to have a beneficial effect insofar as regional air toxics are concerned. Although sufficient data are not available to calculate the corresponding decrease in other air toxics, it would be reasonable to expect a decrease in all air toxics generated from vehicle exhaust, with a corresponding decrease in regional health risk associated with mobile sources.

4.2.4 Localized Carbon Monoxide Emissions

Mobile source emissions due to engine combustion exhausts from project-related locomotive and vehicular traffic were evaluated in the EIR (see section 4.3.5) as localized impacts on air quality, for the following corridor locations:

- Gage Avenue & Alameda Street
- Tweedy Boulevard & Alameda Street
- Santa Ana Boulevard & Alameda Street
- Alameda Street, between Laurel and Myrrh Streets
- Alondra Boulevard & Alameda Street

Carbon Monoxide (CO) concentrations were estimated for each of these locations, for existing (1990) conditions and for the years 2010 and 2020, with and without the project. Standard modeling approaches (i.e. Caline 4) and input assumptions were used, following a protocol that was developed in consultation with Caltrans and using emission factors that were developed by the California Air Resources Board. The results of the analysis, shown in section 4.3.5 of the EIR, indicated elevated concentrations of CO at some locations for both the No Build and proposed project alternatives, to the point that State and Federal 8-hour standards were exceeded. This result is attributable to two causes. First, the available future emission factors (for year 2009) overstate CO production in years beyond 2009. (It has since been learned that more recent [circa 1993-94] adopted emission factors would also suggest less CO production.) Second, all the proposed project alternatives would have provided more traffic capacity than currently exists, which would attract a substantial number of additional vehicles to the corridor, thereby increasing CO production.

As is noted in section 3.2, the air quality regulatory environment is currently undergoing change, involving the recent issuance of a Federal Implementation Plan (see section 3.2.3) and promulgation of new conformity regulations (see section 3.2.2). The new conformity regulations, in particular, differ substantially from those that were in effect at the time the EIR was prepared. In addition, as has already been noted above, updated emission factors have become available. Also, the traffic volumes expected under the locally preferred alternative would be much less than that assumed under EIR Alternative 2.1A; in effect equivalent to the level of traffic expected under the No Build scenario. In order to account for these developments, the previous analysis of localized carbon monoxide concentrations was updated for this EIS.

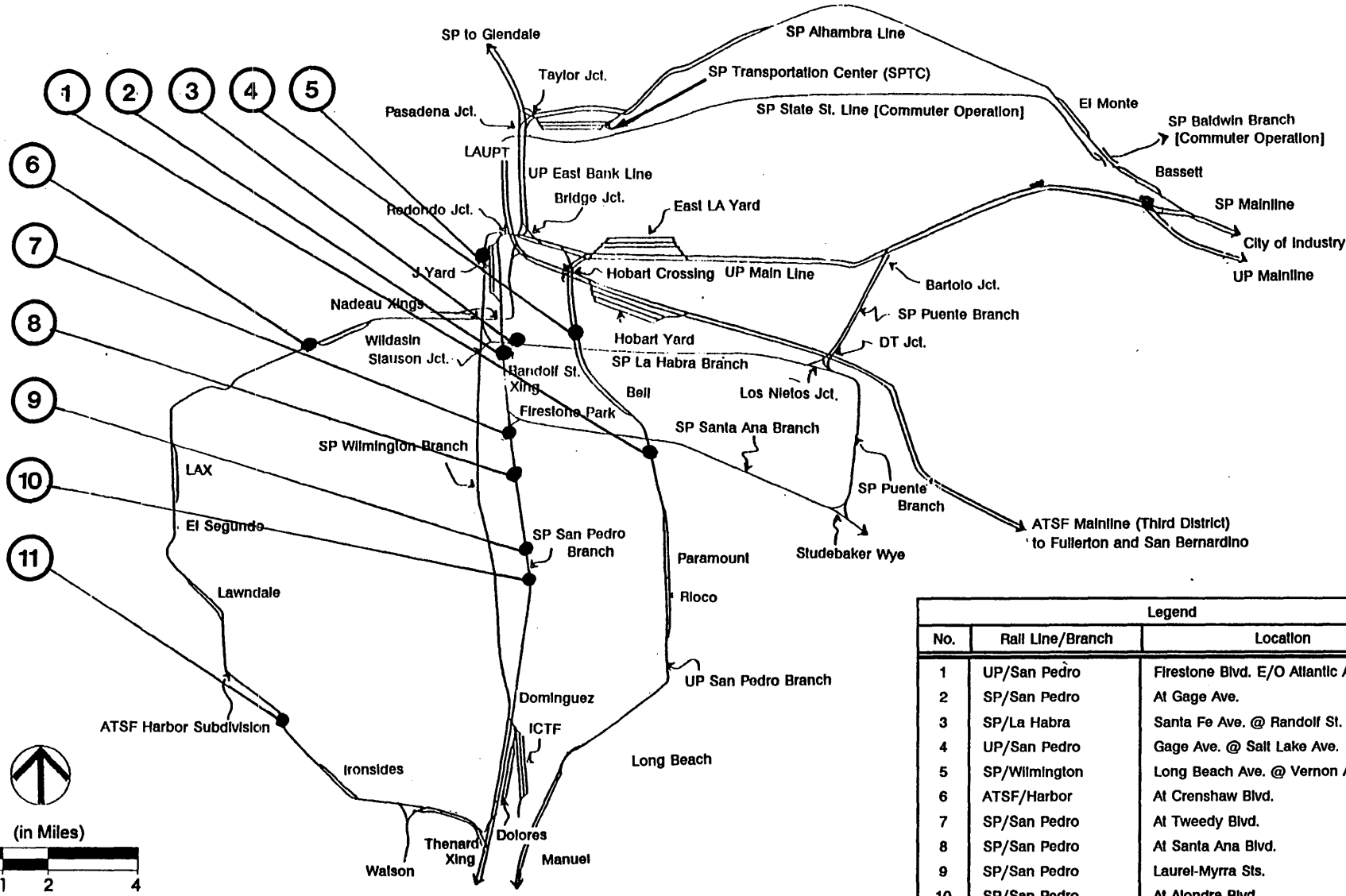
Analysis Protocol

Carbon Monoxide concentrations were estimated at a total of 11 locations (see Figure 4-1). Five of these locations are the same as those used in the EIR. The remaining six locations were at-grade railroad crossings which were chosen to determine the difference between Alternative 2.1B and the No Build alternative on other rail lines in the region; implementation of the proposed project would virtually eliminate delays at grade crossings that would otherwise occur on these lines. Of the other regional rail lines analyzed, one location was chosen on the SP Wilmington Branch, one on the SP La Habra Branch, two on the UP San Pedro Branch, and two on the ATSF Harbor Subdivision. All locations were further chosen based on the presence of sensitive receptors in close proximity which could be potentially affected.

The California Line Source (CALINE 4) Model was used for the analysis. This model has been approved by Air Resources Board (ARB) and Southern California Air Quality Management District (SCAQMD). CALINE4 is a Gaussian plume dispersion model developed by the California Department of Transportation (CALTRANS) to predict concentrations of air pollutants near line sources. Worst-case meteorological conditions were assumed and background levels of carbon monoxide were estimated based on data provided by the SCAQMD. Future year (2010 and 2020) background levels were calculated by applying a factor comprised of the ratio of future year emission factor divided by current (1990) emission factor, multiplied by the ratio of future year traffic divided by current traffic. Traffic volume data for the peak afternoon hour were used (traffic volume data for the peak afternoon hour are expected to represent the peak traffic volumes throughout the day as peak morning traffic volumes collected are generally less than peak afternoon traffic volumes). Emission factors used for the analysis were taken from the EMFAC7F series, published by the ARB. This is the most recent set of emission factors recommended for use by the U.S. EPA. The analysis was conducted for 1990, 2010 and 2020, for the No Build and Project conditions, for both the 1-hour and 8-hour averaging periods. The results are presented in Tables 4-4 through 4-8.

Two types of locations were modeled. The first type includes intersections where traffic flow is controlled both by signalization and train delays. The second type includes railroad crossings located away from intersections where traffic flow is interrupted only by train delays. In the first case, an average vehicle idle time per hour was calculated using a weighted average of the two flow interruption behaviors and in the second case, proportionate vehicle idle emissions from train delays was averaged over the course of one hour with free flow emissions. At each location, the model was used to compute CO concentrations at several receptors, and the highest value was selected to characterize the location.

As shown in Table 4-4, existing violations of the Federal 1-hour standard were calculated at six of the 11 locations analyzed. Violations of the 8-hour standard were calculated at all 11 locations.



Legend		
No.	Rail Line/Branch	Location
1	UP/San Pedro	Firestone Blvd. E/O Atlantic Ave.
2	SP/San Pedro	At Gage Ave.
3	SP/La Habra	Santa Fe Ave. @ Randolf St.
4	UP/San Pedro	Gage Ave. @ Salt Lake Ave.
5	SP/Wilmington	Long Beach Ave. @ Vernon Ave.
6	ATSF/Harbor	At Crenshaw Blvd.
7	SP/San Pedro	At Tweedy Blvd.
8	SP/San Pedro	At Santa Ana Blvd.
9	SP/San Pedro	Laurel-Myrra Sts.
10	SP/San Pedro	At Alondra Blvd.
11	ATSF/Harbor	At Torrance Blvd.

Source: Myra L. Frank & Associates, Inc., 1994.

FIGURE 4-1

Localized Carbon Monoxide Analysis Sites

ALAMEDA CORRIDOR EIS

TABLE 4-4
EXISTING (1990) MAXIMUM 1-HOUR & 8-HOUR CARBON MONOXIDE CONCENTRATIONS, parts per million (ppm)

RECEPTOR LOCATION	1-HOUR CONCENTRATION			8-HOUR CONCENTRATION[3]		
	BACKGROUND[1]	TRAFFIC CONTRIBUTION[2]	TOTAL	BACKGROUND[1]	TRAFFIC CONTRIBUTION[2]	TOTAL
ALAMEDA CORRIDOR						
At Gage Avenue	13.0	5.2	18.2	9.9	4.2	14.1
At Tweedy Blvd.	24.0	17.0	41.0	16.8	13.6	30.4
At Santa Ana Blvd.	24.0	31.3	55.3	16.8	25.0	41.8
Laurel - Myrrh Sts.	24.0	3.5	27.5	16.8	2.8	19.6
At Alondra Blvd.	24.0	35.4	59.4	16.8	28.3	45.1
SP - WILMINGTON BRANCH						
Long Beach Ave. @ Vernon Ave.	18.5	21.0	39.5	13.3	16.8	30.1
SP - LA HABRA BRANCH						
Santa Fe Ave. @ Randolph St.	18.5	41.9	60.4	13.3	33.5	46.8
UP - SAN PEDRO BRANCH						
Gage Ave. @ Salt Lake Ave.	18.5	42.4	60.9	13.3	33.9	47.2
Firestone Blvd. e/o Atlantic Ave.	24.0	10.6	34.6	16.8	8.5	25.3
ATSF - HARBOR SUBDIVISION						
At Crenshaw Blvd.	19.0	5.0	24.0	12.7	4.0	16.7
At Torrance Blvd.	19.0	3.9	22.9	12.7	3.1	15.8

Notes: (1) Background CO concentrations were based on ambient data collected at SCAQMD monitoring stations.
(2) Traffic data were provided by Katz, Okitsu & Associates, May 1994.
(3) 8-hour CO concentrations were based on maximum 1-hour concentrations and a persistence factor of 0.8. indicates a violation of the federal standard.

Source: Radian Corporation, 1994.

TABLE 4-5
YEAR 2010 MAXIMUM 1-HOUR CARBON MONOXIDE CONCENTRATIONS (ppm)[1]

RECEPTOR LOCATION	BACKGROUND[2]	NO PROJECT		WITH PROJECT	
		TRAFFIC CONTRIBUTION[3]	TOTAL	TRAFFIC CONTRIBUTION[3]	TOTAL
ALAMEDA CORRIDOR					
At Gage Avenue	2.6	0.9	3.5	0.9	3.5
At Tweedy Blvd.	4.9	4.0	8.9	3.9	8.8
At Santa Ana Blvd.	4.8	6.9	11.7	6.8	11.6
Laurel - Myrrh Sts.	4.6	0.6	5.2	0.6	5.2
At Alondra Blvd.	4.7	8.7	13.4	5.3	10.0
SP - WILMINGTON BRANCH					
Long Beach Ave. @ Vernon Ave.	4.3	5.6	9.9	5.5	9.8
SP - LA HABRA BRANCH					
Santa Fe Ave. @ Randolph St.	4.3	11.1	15.4	10.4	14.7
UP - SAN PEDRO BRANCH					
Gage Ave. @ Salt Lake Ave.	4.3	13.2	17.5	12.4	16.7
Firestone Blvd. e/o Atlantic Ave.	5.6	3.6	9.2	2.3	7.9
ATSF - HARBOR SUBDIVISION					
At Crenshaw Blvd.	4.3	1.4	5.7	1.1	5.4
At Torrance Blvd.	4.3	1.5	5.8	1.0	5.3

Notes: (1) Federal standard = 35 ppm.
(2) Background CO concentrations were based on ambient data collected at SCAQMD monitoring stations.
(3) Traffic data were provided by Katz, Okitsu, & Associates, May, 1994.

Source: Radian Corporation, 1994.

TABLE 4-6
YEAR 2010 MAXIMUM 8-HOUR CARBON MONOXIDE CONCENTRATIONS (ppm)[1]

RECEPTOR LOCATION	BACKGROUND[2]	NO PROJECT		WITH PROJECT	
		TRAFFIC CONTRIBUTION[3]	TOTAL	TRAFFIC CONTRIBUTION[3]	TOTAL
ALAMEDA CORRIDOR					
At Gage Avenue	2.0	0.7	2.7	0.7	2.7
At Tweedy Blvd.	3.4	3.2	6.6	3.1	6.5
At Santa Ana Blvd.	3.4	5.5	8.9	5.4	8.8
Laurel - Myrrh Sts.	3.2	0.5	3.7	0.5	3.7
At Alondra Blvd.	3.3	7.0	10.3	4.2	7.5
SP - WILMINGTON BRANCH					
Long Beach Ave. @ Vernon Ave.	3.1	4.5	7.6	4.4	7.5
SP - LA HABRA BRANCH					
Santa Fe Ave. @ Randolph St.	3.1	8.9	12.0	8.3	11.4
UP - SAN PEDRO BRANCH					
Gage Ave. @ Salt Lake Ave.	3.1	10.6	13.7	9.9	13.0
Firestone Blvd. e/o Atlantic Ave.	3.9	2.9	6.8	1.8	5.7
ATSF - HARBOR SUBDIVISION					
At Crenshaw Blvd.	2.9	1.1	4.0	0.9	3.8
At Torrance Blvd.	2.9	1.2	4.1	0.8	3.7

Notes: (1) Federal standard = 9 ppm.
(2) Background CO concentrations were based on ambient data collected at SCAQMD monitoring stations.
(3) Traffic data were provided by Katz, Okitsu, & Associates, May, 1994.
indicates a violation of the federal standard.

Source: Radian, Corporation, 1994.

TABLE 4-7
YEAR 2020 MAXIMUM 1-HOUR CARBON MONOXIDE CONCENTRATIONS (ppm)[1]

RECEPTOR LOCATION	BACKGROUND[2]	NO PROJECT		WITH PROJECT	
		TRAFFIC CONTRIBUTION[3]	TOTAL	TRAFFIC CONTRIBUTION[3]	TOTAL
ALAMEDA CORRIDOR					
At Gage Avenue	3.2	1.2	4.4	1.2	4.4
At Tweedy Blvd.	6.2	2.8	9.0	2.8	9.0
At Santa Ana Blvd.	6.1	5.5	11.6	5.5	11.6
Laurel - Myrrh Sts.	5.6	0.9	6.5	0.9	6.5
At Alondra Blvd.	5.8	6.2	12.0	5.1	10.9
SP - WILMINGTON BRANCH					
Long Beach Ave. @ Vernon Ave.	3.5	3.8	7.3	3.7	7.2
SP - LA HABRA BRANCH					
Santa Fe Ave. @ Randolph St.	3.5	7.2	10.7	7.0	10.5
UP - SAN PEDRO BRANCH					
Gage Ave. @ Salt Lake Ave.	3.5	7.9	11.4	7.5	11.0
Firestone Blvd. e/o Atlantic Ave.	4.6	2.0	6.6	1.8	6.4
ATSF - HARBOR SUBDIVISION					
At Crenshaw Blvd.	3.4	0.9	4.3	0.8	4.2
At Torrance Blvd.	3.4	0.8	4.2	0.8	4.2

Notes:
(1) Federal standard = 35 ppm.
(2) Background CO concentrations were based on ambient data collected at SCAQMD monitoring stations.
(3) Traffic data were provided by Katz, Okitsu, & Associates, May, 1994.

Source: Radian Corporation, 1994.

TABLE 4-8
YEAR 2020 MAXIMUM 8-HOUR CARBON MONOXIDE CONCENTRATIONS (ppm)[1]

RECEPTOR LOCATION	BACKGROUND[2]	NO PROJECT		WITH PROJECT	
		TRAFFIC CONTRIBUTION[3]	TOTAL	TRAFFIC CONTRIBUTION[3]	TOTAL
ALAMEDA CORRIDOR					
At Gage Avenue	2.4	1.0	3.4	1.0	3.4
At Tweedy Blvd.	4.3	2.2	6.5	2.2	6.5
At Santa Ana Blvd.	4.2	4.4	8.6	4.4	8.6
Laurel - Myrrh Sts.	3.9	0.7	4.6	0.7	4.6
At Alondra Blvd.	4.0	5.0	9.0	4.1	8.1
SP - WILMINGTON BRANCH					
Long Beach Ave. @ Vernon Ave.	2.5	3.0	5.5	3.0	5.5
SP - LA HABRA BRANCH					
Santa Fe Ave. @ Randolph St.	2.5	5.8	8.3	5.6	8.1
UP - SAN PEDRO BRANCH					
Gage Ave. @ Salt Lake Ave.	2.5	6.3	8.8	6.0	8.5
Firestone Blvd. e/o Atlantic Ave.	3.2	1.6	4.8	1.4	4.6
ATSF - HARBOR SUBDIVISION					
At Crenshaw Blvd.	2.3	0.7	3.0	0.6	2.9
At Torrance Blvd.	2.3	0.6	2.9	0.6	2.9

Notes:
(1) Federal standard = 9 ppm.
(2) Background CO concentrations were based on ambient data collected at SCAQMD monitoring stations.
(3) Traffic data were provided by Katz, Okitsu, & Associates, May, 1994.
indicates a violation of the federal standard.

Source: Radian Corporation, 1994.

Tables 4-5 and 4-6 show estimated CO concentrations in the year 2010. As shown in Table 4-5 under the No Project alternative, no violations of the 1-hour standard were calculated, and the proposed project would result in improvements at all locations but one (at Gage Avenue), at which the results were the same both with and without the project. As shown in Table 4-6, the 8-hour standard was found to be violated at three locations without the project. The proposed project reduced the severity of these violations at all three locations, but violations still occurred at two of the three. The proposed project was found to reduce CO concentrations at all locations analyzed but two.

Tables 4-7 and 4-8 show estimated CO concentrations in the year 2020. As shown in Table 4-7, under the No Project alternative, no violations of the 1-hour standard were calculated, improvements would result from the proposed project at seven of the 11 locations and results would remain the same both with and without the project at the other four locations. Also as shown in Table 4-8, under the No Project Alternative, no violations of the 8-hour standard were calculated. The proposed project was found to reduce CO concentrations at four of the 11 locations analyzed.

The results of the localized CO analysis indicate that the proposed project would reduce carbon monoxide concentrations both within the proposed consolidated corridor, and also along other rail lines in the region. Further, the proposed project would reduce the number and severity of CO violations both within the corridor and along other rail lines.

4.2.5 Conformity

Recently, EPA has published regulations to determine whether a given project conforms with the Clean Air Act (40CFR51; November 24,1993). A primary component of this determination is the necessity for a project to be included in a transportation plan and program that have been found to conform with the Clean Air Act. The proposed project is included in the 1994 Regional Mobility Element and the 1993 to 1999 Regional Transportation Improvement Program (RTIP), both of which have been found to conform with the Clean Air Act (action taken by SCAG's Regional Council, June 1994). In addition to this, the conformity regulations outline a number of specific requirements which also must be met. For all time periods following issuance of these regulations, these requirements are as follows.

- ¶51.412 *The conformity determination must be based on the latest planning assumptions.* All assumptions used in the localized carbon monoxide analysis reflect the most recent planning assumptions, such assumptions being underlying traffic growth rates.

- ¶51.414 *The conformity determination must be based on the latest emission estimation model available.* The CALINE 4 model is the most recent approved model, and the EMFAC7F emissions factor series is the latest acceptable data set in this regard.

- ¶51.416 *The metropolitan planning organization (MPO) must make the conformity determination.* SCAG, the MPO for the project area, has been requested to issue a conformity determination for the proposed project.

- ¶51.420 *There must be a currently conforming transportation plan and TIP at the time of project approval.* A conforming transportation plan and TIP currently exist.

- ¶51.422 *The project must come from a conforming transportation plan and program.* The proposed project is included in the 1994 Regional Mobility Element and the 1993 to - 1999 RTIP, both of which have been found in conformity.

- ¶51.424 *The proposed project must not cause or contribute to any new localized CO or PM_{10} violations or increase the frequency or severity of any existing CO or PM_{10} violations in CO and PM_{10} nonattainment areas.* The localized CO analysis demonstrates that the proposed project would not cause or contribute to new localized violations or increase the frequency or severity of such existing violations. No EPA model currently exists with which to estimate localized PM_{10} concentrations and therefore EPA has waived this analytical requirement until such time as a suitable model is available.

- ¶51.426 *The proposed project must comply with PM_{10} control measures in the applicable implementation plan.* The proposed project will comply with all PM_{10} control measures in the implementation plan and in established SCAQMD rules.

In addition to the above requirements, when Federal Attainment Plans have been submitted to the EPA and prior to their approval, the air basin is considered to be in a "transition period," and another conformity requirement applies. The SCAQMD has submitted to the EPA Federal Attainment Plans or Rate of Progress Plans for all criteria pollutants of concern in the South Coast Air Basin. The following additional transition period requirement thus applies.

- ¶51.434 *The proposed project must eliminate or reduce the severity and number of localized CO violations in the area substantially affected by the project (in CO nonattainment areas).* The localized CO analysis demonstrates that the proposed project would eliminate or reduce CO violations throughout the area substantially affected by the project, such area including, in addition to the Alameda Corridor itself, other SP, UP and ATSF rail lines.

The Southern California Association of Governments has reviewed the air quality analysis and has issued a conformity determination for the proposed project. A copy of this determination in provided in Appendix F.

4.2.6 Mitigation Measures

4.2.6.1 Construction

Proposed mitigation measures (and estimated emission reduction efficiencies) for use during the project construction period (as applicable) are shown in Table 4-9. It should be noted that the listed reduction efficiencies are not additive. For example, if the four measures broken out in Table 4-10 are implemented, an overall 52 percent (not 220 percent) reduction in PM_{10} emissions is predicted. The proposed mitigation measures (or equivalent) shown in these two tables will be used as the basis of the air quality aspects of the construction specifications, as applicable to specific portions of the construction process.

TABLE 4-9
MITIGATION MEASURES FOR CONSTRUCTION ACTIVITIES

EMISSION SOURCE (Pollutant)	MITIGATION MEASURE	EMISSIONS REDUCTION EFFICIENCY
Emissions from construction equipment (CO, NO_x, PM_{10}, ROG, air toxics)	• Methanol, natural gas, propane or butane-powered construction equipment, instead of gasoline or diesel, where practicable	60 - 90 % (ROG, CO, PM_{10})[1]
	• Use of gasoline-powered equipment that has catalytic converters	Not Quantified
	• Suspension of construction equipment operations during second stage smog alerts	Not Quantified
	• Reduce on-site truck idling time to 2 minutes or less	Not Quantified
	• Use electricity from power poles rather than temporary generators, where practicable	96 - 99% (ROG,NO_x, CO, PM_{10})
	• Schedule movements of construction materials during off-peak hours, if possible	Not Quantified
	• Provide temporary traffic control	Not Quantified
Fugitive dust from roads (PM_{10})	• Street sweeping at the end of day if visible soil material is carried over to adjacent public roads	25 - 60%
	• Water application twice daily or chemical soil stabilizer application to all unpaved parking or staging areas and unpaved road surfaces	45 - 85%
	• Wheel washer installation where vehicles exit unpaved roads onto paved roads, or wash off of trucks leaving the site every trip	60 - 80%
	• Traffic speeds on all unpaved road surfaces to be reduced to minimal levels	40 - 70%
	• All trucks hauling loose materials to be covered or a minimum 0.6 meters (two feet) of freeboard maintained	40 - 85%
	• Pavement of construction roads that have a high volume of construction equipment trips	90 - 99%
	• Pavement of all construction access roads onto the site from the main road	100%
Fugitive dust from construction activities (PM_{10})	• Application of approved chemical soil stabilizers to all inactive construction areas	40 - 85%
	• Replacement of ground cover in disturbed areas as quickly as possible	20 - 65%
	• Enclosing, covering, watering or applying approved soil binders to exposed stock piles, where silt content is greater than 50%	40 - 98%
Fugitive dust from grading and demolition (PM_{10})	• Watering active sites at least twice daily	45 - 90%
	• Monitoring for PM_{10} according to SCAQMD procedures	Not Quantified
	• Suspend grading activities when wind speeds (as instantaneous gusts) exceed 40 kilometers (25 miles) per hour	100%
Emissions from construction worker travel (CO, NO_x, PM_{10}, ROG)	• Develop and implement a construction trip-reduction plan to encourage carpooling and use of bus by construction workers.	Not Quantified

Note:
[1] Although use of methanol, natural gas, propane or butane equipment reduces emissions of ROG, CO and PM_{10}, NO_x emissions would increase.

Source: Radian Corporation, 1992; SCAQMD, 1993.

TABLE 4-10
CONSTRUCTION RELATED ACTIVITY - PM_{10} MITIGATION MEASURES

CONSTRUCTION ACTIVITY	MITIGATION MEASURES	REDUCTION EFFICIENCY*
Filling, dump, grading and excavating	Water active site at least twice daily	50 %
Trucking operations on paved roads	Sweep streets at end of day	50 %
Trucking operations on unpaved roads	Apply water twice daily	50 %
	Wash trucks and equipment leaving the site and install wheel washes	70 %

Note: *Reduction efficiencies from the SCAQMD Draft CEQA Air Quality Handbook, May 1992.

Source: Radian Corporation, 1992.

If contaminated soil is encountered during construction of the proposed project, it will be immediately remediated using techniques approved by appropriate agencies. These techniques would also mitigate the release of air toxics, as required by appropriate SCAQMD regulations.

4.2.6.2 Operation

The proposed project (and improvements in locomotive technology) would reduce regional criteria and air toxic emissions and therefore mitigation measures are not required. The proposed project has been listed as a Transportation Control Measure in previous AQMPs and would contribute to railroad emission control strategies proposed in the 1994 AQMP. At some point in the future, if rail electrification were to become a reality, further reductions in regional criteria pollutants and air toxics could be achieved. The Southern California Accelerated Rail Electrification Program projected that electrification of freight line haul trains would decrease 2010 freight rail criteria emissions in the SCAB by over 76 percent; however, substantial cost would be required. Emissions from locomotives with diesel engines or with electrification with the proposed project are tabulated in Table 4-11. The proposed project would be designed to permit the installation of electrification equipment and hardware; however, electrification of the Alameda Corridor is not proposed at the present time.

TABLE 4-11
REGIONAL LOCOMOTIVE CRITERIA EMISSIONS
WITH ELECTRIFICATION [KG/DAY (LBS/DAY)]

	CO	NO_x	ROG	PM_{10}	SO_x
Diesel Powered	3,167 (6,983)	35,291 (77,817)	1,651 (3,641)	1,149 (2,534)	2,016 (4,445)
Electrically Powered	142 (314)	1,044 (2,303)	112 (248)	39 (86)	9 (19)
Net Benefit	3,024 (6,669)	34,247 (75,514)	1,539 (3,393)	1,110 (2,448)	2,007 (4,426)

Note: Emissions based on proportional reduction as reported in the Southern California Accelerated Rail Electrification Program.

Source: Radian Corporation, 1992.

4.3 CULTURAL RESOURCES

Please refer to Section 5.8 of the EIR for additional detailed discussion of cultural resources.

4.3.1 Evaluation of Effects on Historic Properties

4.3.1.1 Criteria of Effect and Adverse Effect

Any effects of the proposed undertaking on historic properties listed in or determined eligible for inclusion in the National Register of Historic Places must be reviewed for compliance with Section 106 of the National Historic Preservation Act using the rules and regulations found in 36 *CFR* Part 800 regarding criteria of effect and adverse effect. These criteria were developed by the Advisory Council on Historic Preservation and are defined as follows:

Criterion of Effect:

> "An undertaking has an effect on a historic property when the undertaking may alter characteristics of the property that may qualify the property for inclusion in the National Register. For the purpose of determining effect, alteration to features of a property's location, setting or use may be relevant depending on a property's significant characteristics and should be considered." [Section 800.9(a)]

Criteria of Adverse Effect:

> "An undertaking is considered to have an adverse effect when the effect on a historic property may diminish the integrity of the property's location, design, setting, materials, workmanship, feeling or association. Adverse effects on historic properties include, but are not limited to:
>
> (1) Physical destruction, damage, or alteration of all or part of the property;
>
> (2) Isolation of the property from or alteration of the character of the property's setting when that character contributes to the property's qualification for the National Register;
>
> (3) Introduction of visual, audible, or atmospheric elements that are out of character with the property or alter its setting;
>
> (4) Neglect of the property resulting in its deterioration or destruction; and
>
> (5) Transfer, lease, or sale of the property." [Section 800.9 (b)]

Exceptions to the Criteria of Adverse Effect are as follows:

> "Effects of an undertaking that would otherwise be found to be adverse may be considered as being not adverse for the purpose of these regulations:
>
> (1) When the historic property is of value only for its potential contribution to archeological, historical, or architectural research, and when such value can be substantially preserved through the

conduct of appropriate research, and such research is conducted in accordance with applicable professional standards and guidelines;

(2) When the undertaking is limited to the rehabilitation of buildings and structures and is conducted in a manner that preserves the historical and architectural value of affected historic property through conformance with the Secretary's "Standards for Rehabilitation and Guidelines for Rehabilitating Historic Buildings"; or

(3) When the undertaking is limited to the transfer, lease or sale of historic property, and adequate restrictions or conditions are included to ensure preservation of the property's significant historic features." [Section 800.9(c)]

4.3.1.2 Historic, Architectural, Cultural Resources Impact Criteria

Generally, several types of impacts on a historic building may occur during the construction or operational phase of a project of this nature. The types of impacts on historic, architectural, or cultural resources anticipated for this project are as follows. For the construction phase, effects such as demolition, complete or partial right-of-way acquisition, temporary loss of access, vibration, and settlement may be considered. For the operational phase, permanent loss of access, vibration, noise, visual, alteration, and disruption of the integrity of setting may be considered. In order to establish criteria for these potential effects, technical reports and criteria were examined for right-of-way acquisition, land use sensitivity, noise, vibration, and visual obstruction.

Construction impacts not resulting in demolition, settlement or which produce a temporary loss of access are considered temporary and therefore negligible.

The significance of right-of-way acquisition was based on the "partial" or "full" take determinations found in the land acquisition section (Section 4.7.8). In addition, the right-of-way plans and profiles for the project alternatives were examined to better interpret the effects of acquisition on a site specific basis. If the right-of-way acquisition results in the demolition of all or part of the character-defining portion of a structure, or results in isolation of the structure from important viewpoints, it would be considered an adverse effect. If the acquisition is limited to a portion of the resource property, and not the structure, the determination of effect is subjective and is dependent upon the historical association of the property to the significance of the resource, and the nature of the resulting loss of integrity of setting.

Impact due to loss of access was also based on the land acquisition analysis done for this project. Site specific determinations were based on project plans in the immediate vicinity of a resource. Access which would be permanently restricted to traffic in only one direction by an alternative is not considered to be a substantial effect. Loss of access which would result in isolation of the property, loss of important viewpoints to the building, or which would diminish its operational capacity to such a degree that it may force a change of use or cause the property to be vacated is considered an adverse effect.

The potential for visual impact was established in the APE (See Section 3.3 for definition) as that area within a reasonable view shed of an elevated structure. If an historic resource is located beyond this distance from an alternative alignment, a finding of "no effect" for this impact category was determined. Because the existing railroad and roadway configuration of the majority of the project is at-grade, at-grade or below grade project improvements are not considered to create substantial visual effects. Also, railroad related buildings and structures and most industrial buildings are not considered visually sensitive to railroad improvements. If the character-defining portion of a visually sensitive resource is located near a proposed elevated feature such as an overpass, or is in an area which historically had no railroad tracks, the resulting visual effect may or may not be considered adverse, depending on the specific conditions involved.

Noise impact criteria are dependent upon the sensitivity of the use of the structure. If a particular resource does not contain residential or other similar occupancy which would be sensitive to noise, it is not considered subject to noise impact. The criteria for significant effect as outlined in Section 4.7.3 of this EIS are defined in two different impact levels. A *severe* effect upon a noise sensitive property is defined as a projected future sound level (CNEL) greater than 72 dBA, and the CNEL with tracks alone would be greater than 67 dBA. Effects upon noise sensitive properties defined as *substantial* are those where the projected future sound level (CNEL) would be greater than 67 dBA and more than 3 dBA greater than future sound level for the No Build Alternative.

Ground-borne vibration impact criteria are based upon the Federal threshold of 95 dB for damage to fragile historic buildings. Substantial annoyance levels of ground-borne vibration are not anticipated for this project except in one isolated area where a vibration sensitive building would be less than 31 meters (100 feet) from the depressed trainway.

Potential settlement criteria were based on proximity to excavation proposed by the proposed project. The depth of the underpass or railroad trench excavation relative to the closest point of a structure was analyzed for each adjacent resource. If the historic structure is considered seismically unsound, i. e. unreinforced masonry, it would be particularly susceptible to damage by potential settlement. A determination of adverse effect resulted for such structures in extremely close proximity to an excavation.

Disruption of integrity of setting was analyzed in terms of the historic or existing use of the resource, proximity to elevated structures, and the absence or presence of intervening structures. For example, introduction of railroad tracks alongside a resource where there had previously been none would be a disruption of the integrity of setting. Replacement of a landscaped front yard with a relocated roadway would also be a substantial disruption of integrity of setting.

Determinations of effect used plans and profiles prepared for this project to calculate the distance of the structure from the proposed project.

4.3.2 Application of Criteria of Effect

4.3.2.1 Archaeological

Even though a majority of the overall project area is located within an urban environment characterized by roadways, railroad lines and moderate to heavy commercial and industrial land use, there is also still a potential for buried prehistoric and/or historic archaeological resources

to exist within the project boundaries. Since it is not possible to assess impacts in advance of discovery, a Society of Professional Archaeologists (SOPA)-qualified archaeologist will be contacted promptly should unanticipated cultural resource remains be encountered during development or construction related activities within the limits of the proposed project.

Although the existence of CA-LAn-385 (See Section 3.3) could not be substantiated by the Phase 1 reconnaissance, the fact that burials were found suggests the possible presence of an important resource. Because of the sensitivity of the site, archaeological monitoring will be conducted in that area.

4.3.2.2 Historic and Architectural Resources

Findings of No Effect

On February 21, 1995 (see Appendix F) the SHPO concurred in the determination that the effects of the undertaking on the following properties would be *No Effect* according to the conditions set forth in 36 CFR 800.9:

- Rancho Dominguez Adobe

The Rancho Dominguez Adobe is located upon a hill and is over 122 meters (400 feet) from the nearest portion of the proposed undertaking. At this location, the proposed project would be nearly identical to its existing at-grade configuration, involving track re-routing and would require no "alteration to features of the [Rancho Dominguez Adobe] property's location". Railroad activity has been an integral part of the 1827 adobe's setting since 1869, and therefore the property's setting would remain unchanged as a result of this undertaking. Approximately half the adobe/museum building, however, would be within the 67 dBA noise contour. It is important to note that existing railroad noise emanating from the Wilmington Branch west of the adobe would decrease as a result of this project because much of its traffic would be diverted to the Alameda Corridor. The noise contour reflects a combination of both nighttime noise (to which has been added a penalty) and daytime noise. Because the adobe is uninhabited, its use would only be affected by railroad noise during museum hours. The increase in noise level would not be sufficient to further restrict or change the present use of the adobe as a museum, and the railroad noise itself is a continuation of a 125 year long condition and would not be out of character with the property. Furthermore, the Rancho Dominguez Adobe was listed in the National Register of Historic Places in 1976 under Criterion C presumably because of the rarity of its adobe building type and early date of construction– not because of its significance as a museum. The undertaking would clearly not "alter characteristics of the property that may qualify the property for inclusion in the National Register", and therefore, a finding of "no effect" of the undertaking with regard to the Rancho Dominguez Adobe is most appropriate.

The Claretian seminary on the Rancho Dominguez Adobe property located west of the adobe is 198 meters (650 feet) from the proposed undertaking and is well outside the noise contour and would not be affected by the undertaking in any way.

- David Starr Jordan High School

The undertaking would not alter the characteristics of David Starr Jordan High School that qualify the property for inclusion in the National Register. There would be no alteration to important features of the property's location, setting or use. The architecturally important high school

buildings are all located more than 122 meters (400 feet) from the nearest portion of the proposed project. The 122 meter (400 foot) distance is great enough to isolate them from any substantial construction activity and, therefore, there would be no "physical destruction, damage, or alteration" of the property. Since the proposed project would still be in a below-grade configuration at 103rd Street, there would be no "introduction of visual elements". The noise analysis conducted for this project indicates that projected noise levels could exceed the impact threshold of 67 dBA about 50 feet into the school parking lot fronting on Alameda Street, but would be well out of distance from any of the school buildings. The remaining Criteria of Adverse Effect do not apply in the case of Jordan High School, as no atmospheric elements are being introduced, the school will continue to function normally and will not be neglected as a result of the project, and there will be no transfer, lease or sale of the property. No additional mitigation measures would be required.

- Pacific Electric Railway Watson Station

The Pacific Electric Railway Watson Station is located at the southwest corner of Sepulveda Boulevard and Alameda Street, adjacent to active railroad lines and holding tracks. The project would introduce a new set of active tracks to the west of the building, on the site of existing holding tracks. Railroad tracks and activity have been an integral part of this building's setting since its original construction in 1905. Because the undertaking is limited to track reconfiguration and would not alter the characteristics that qualify the Watson Station for the National Register, the undertaking would have no effect on the historic property. A minimum separation distance of ten feet between proposed project improvements and the historic building will be maintained.

- Ritter Elementary School

The undertaking would not alter the characteristics of Ritter Elementary School that qualify the property for inclusion in the National Register. There would be no alteration to character-defining features of the property's location, setting or use. The architecturally important main school building of Ritter Elementary is located more than 114 meters (375 feet) from the nearest portion of the proposed project, which would still be in a trench configuration at this location. The 114 meter (375 foot) distance is sufficient to isolate Ritter Elementary from substantial construction activity and, therefore, there would be no "physical destruction, damage, or alteration" of the property. Since the project is still in trench configuration at 111th Street, there would be no "introduction of visual elements". The noise analysis conducted for this project indicate that projected noise levels could exceed the impact threshold of 67 dBA about 21 meters (70 feet) into the school parking lot and playground fronting on Alameda Street, but would be about 73 meters (240 feet) from the historic main school building. The remaining Criteria of Adverse Effect do not apply in the case of Ritter Elementary, as no atmospheric elements would be introduced, the school will continue to function normally and will not be neglected as a result of the project, and there will be no transfer, lease, or sale of the property. No additional mitigation measures would be required.

Findings of No Adverse Effect

On February 21, 1995 (see Appendix F) the SHPO concurred in the determination that the effects of the undertaking on the following property would be *No Adverse Effect* according to the conditions set forth in 36 CFR 800.9(c)(3):

- Redondo Junction Historic District

The main line currently used by Amtrak/Southern California Regional Rail Authority (SCRRA) in an at-grade configuration would be reconfigured on an elevated structure at the Redondo Junction. The proposed project must be at-grade at this location because it must cross the Los Angeles River about 122 meters (400 feet) east of the junction. The roundhouse is located about 46 meters (150 feet) west of the elevated structure and would not experience any substantial obstruction of views to or from it. The office would be shielded from the elevated structure by the roundhouse and would undergo no effect. The watchtower, however, would be located only about 6 meters (20 feet) to the west of the elevated structure and, because of its relatively small scale, would experience a substantial change to its visual setting. This change would not be out of character with the setting of the tower since the underlying railroad function would be unchanged. However, the tower would probably have already undergone a more substantial impact by another project. The tower is scheduled to be taken out of service to facilitate a technological upgrading of Redondo Junction for the SCRRA Metrolink system, and its future role is not under the control of this undertaking. The overall visual effect on the remainder of the district would be negligible. The operations of the roundhouse, and office building would not be disrupted by the grade separation, as the feeder lines are located to the north of the structure and would not be disconnected.

There would be no transfer, lease, or sale of any of the contributing features of the district since the acquisition on this property would be limited to the track right-of-way. The acquisition is not considered adverse, since changes are limited to an at-grade improvement of the tracks in their historic location, and the undertaking would not have an effect on any of the contributing features of the district. Since railroad operations would continue, there would be no substantial change to character of the district's setting by this project, and the introduction of visual, audible, or atmospheric elements would be entirely railroad related.

Because the historic property has always been used for transportation purposes and would not be adversely affected by the project, it is exempt from compliance with Section 4(f) of the Department of Transportation Act of 1966 under the provisions set forth in 23 CFR 771.135 *Environmental Impact and Related Procedures; Final Rule* which states that "(f) The Administration may determine that section 4(f) requirements do not apply to restoration, rehabilitation, or maintenance of transportation facilities that are on or eligible for the National Register when: (1) Such work will not adversely affect the historic qualities of the facility that caused it to be on or eligible for the National Register, and (2) the SHPO and the Advisory Council on Historic Preservation (ACHP) have been consulted and have not objected to the Administration finding in paragraph (f)(1) of this section."

4.3.3 Mitigation

4.3.3.1 Archaeological

If buried cultural materials are unearthed during construction, Caltrans' policy states that work must be halted in the vicinity of the find until a qualified archaeologist can assess its significance. If human remains are unearthed during construction, State Health and Safety Code, Section 7050.5 states that "...no further disturbance shall occur..." until the County Coroner has made the necessary findings as to origin and disposition, pursuant to Public Resources Code, Section 5097.98. In either instance, the Caltrans District 7 Environmental Planning Branch should be

notified immediately. These procedures and additional guidelines will be made a part of the project's construction specifications.

Since there is a further possibility of encountering buried prehistoric and/or historic archaeological resources within the overall project boundaries, a SOPA-qualified archaeologist will be contacted promptly should such unanticipated cultural resources remains be encountered during development or construction related activities within the vicinity of the find.

Under 36 CFR 800.11 when an Agency Official finds that the undertaking will affect a previously unidentified property that may be eligible for inclusion in the National Register, the Agency Official shall afford the Council an opportunity to comment by: preparing a Memorandum of Agreement according to the provisions of 36 CFR 800.6; or by developing and implementing actions that take into account the effects of the undertaking on the property to the extent feasible and the comments from the SHPO and Council; or, if the property is principally of archaeological value and subject to the requirements of the Archaeological and Historic Preservation Act, 16 U.S.C. Section 469 (a)-(c), by complying with that Act and implementing regulation instead of these regulations.

4.3.3.2 Historic and Architectural

No mitigation measures beyond those already proposed for this undertaking are necessary to minimize effects on historic and archaeological resources.

4.3.4 Section 4(f) of the Department of Transportation Act

The proposed project would not use land from any "significant publicly owned public park, recreation area, or wildlife and waterfowl refuge, or any significant historic site" [23 CFR 771.135(a)(1)] with the exception of the *AT&SF Redondo Junction/Butte Street Yard District.* The use would be limited to an existing railroad right-of-way that traverses the southern tip of the district. The proposed project would improve and increase the present number of rail lines on the westerly approach to the *Redondo Junction Watchman's Tower* from two to four lines, but it will not require the use of any of the contributing features of the district. Because the historic property has always been used for transportation purposes and would not be adversely affected by the project, it is judged to be exempt from compliance with Section 4(f) of the Department of Transportation Act of 1966 under the provisions set forth in 23 CFR 771.135. This rule states that "(f) [t]he Administration may determine that section 4(f) requirements do not apply to restoration, rehabilitation, or maintenance of transportation facilities that are on or eligible for the National Register when: (1) Such work will not adversely affect the historic qualities of the facility that caused it to be on or eligible for the National Register, and (2) the SHPO and the Advisory Council on Historic Preservation (ACHP) have been consulted and have not objected to the Administration finding in paragraph (f)(1) of this section." Consultation with these two agencies for concurrence with a finding of *No Adverse Effect* for this undertaking has been completed .

4.4 HYDROLOGY AND WATER QUALITY

For additional detailed discussion of hydrology and water quality, see Section 4.2 of the EIR.

4.4.1 Construction Impacts

The project would be considered to have a substantial adverse impact, if: (a) a substantial discharge into surface waters would create pollution, contamination or nuisance, (b) create a substantial safety hazard to construction workers, or (c) a substantial change in the quantity and/or quality of groundwater would occur, either by direct additions or withdrawals or by puncture of an aquifer.

4.4.1.1 Surface Water Resources

Construction impacts to surface water resources within the study area would be related to a number of factors, including: water run-off from the construction sites; and erosion of barren rock and soil surfaces exposed during excavation and construction of bridge piers for project crossings of the Los Angeles River, Compton Creek and Dominguez Channel. Construction of bridge piers within Dominguez Channel may disturb contaminated sediments, assuming the presence of such contaminated sediments in the immediate vicinity of the proposed project. Once disturbed, contamination could be released into the water and eventually travel into Los Angeles Harbor. As stated earlier, the nature and extent of this potential contamination is not currently known. No further construction-related impacts to surface waters are anticipated. These effects are characterized as not substantial.

The Surface Transportation Act of 1987, at Section 144(h), specifies conditions under which certain bridges constructed with federal assistance are no longer subject to Coast Guard permitting procedures. These bridges are: (1) bridges crossing waterways which are not used and are not susceptible to be used for interstate or foreign commerce, and (2) which are nontidal or, if tidal, used only by vessels less than 21 feet in length. Under this provision of the Act, the Coast Guard will accept FHWA determinations that a bridge project funded with federal assistance meets the above criteria and is therefore exempt from the Coast Guard permitting requirements. The U.S. Coast Guard has confirmed that none of the waterways are considered navigable. All five of the bridge crossings included in the proposed action meet the first and second criteria identified above. Neither the Los Angeles River nor the Compton Creek is tidal. All three crossings of the Dominguez Channel south of Vermont Avenue are tidal (the Los Angeles County Flood Control District has confirmed the extent of the tidal portions of the Dominguez Channel); however, no vessels are permitted in the Dominguez Channel (telephone contact: Ralph Appy, Assistant Director of Environmental Management, Port of Los Angeles). FHWA approval of this FEIS constitutes its determination that these five bridges meet the criteria set forth and that all are exempt from the Coast Guard permitting requirements.

4.4.1.2 Floodplains

In the event of a storm during construction within the flood control channel(s), workers within the channel(s) would be at risk. This would not typically be considered a substantial impact during the dry season, which extends from April 15 to October 15. Construction would not be scheduled during the wet season.

4.4.1.3 Groundwater Resources

All current indications are that construction of the project would not encounter groundwater; however, excavation required for the depressed trainway could have an impact on groundwater quality and solid waste disposal. South of the Artesia Freeway, no dewatering would be required. In the best case, perched groundwater would not be encountered and no dewatering would be required north of the Artesia Freeway; in the worst case, perched groundwater could be encountered in approximately one-third of the project area to the north of the Artesia Freeway. Excavation may intercept shallow groundwater and would require dewatering and muck disposal if contamination is encountered. The removed water and muck could necessitate wastewater treatment and possible transport of muck to a Class I or Class II landfill.

4.4.2 Operational Impacts

4.4.2.1 Surface Water Resources

During operation of the proposed project, possible surface water contamination could occur in the event of a spill of material in transport. The major locations for such potential contamination are where the corridor crosses the Los Angeles River in the vicinity of Washington Boulevard, where the corridor crosses Compton Creek in the vicinity of State Route 91 and at the Dominguez Channel crossings. If large amounts of hazardous or toxic materials were to spill into any of these three surface water systems, possible contamination of the Los Angeles Harbor could occur. This is not regarded as a substantial adverse effect, however, because the likelihood of a major spill producing this situation would be low. Please also see section 4.5 for a discussion of hazardous materials and emergency response provisions.

4.4.2.2 Floodplains

The Alameda Corridor would result in a lateral bridge crossing over the Los Angeles River that would not encroach into base floodplains (defined as the 100-year event) as delineated by either the Federal Emergency Management Agency (FEMA) or the U.S. Army Corps of Engineers (USACOE). Support piers for this bridge crossing would be required. The USACOE-delineated base floodplain extends as far north as approximately Rosecrans Avenue in the city of Compton, whereas the FEMA-delineated base floodplain occurs only in the vicinity of the confluence of the Dominguez and Consolidated Channels, at the entrance to Terminal Island. The Alameda Corridor would result in floodplain encroachments in several locations, described below from north to south along the corridor. The proposed project would not adversely affect beneficial floodplain values in the project study area.

- From approximately Rosecrans Avenue to approximately Greenleaf Boulevard, the depressed trainway would pass through a portion of the westernmost edge of the USACOE-delineated base floodplain, for a distance for approximately 2.54 kilometers (1.5 miles).

- From approximately Greenleaf Boulevard to approximately Del Amo Boulevard, the corridor (now in an at-grade configuration) would pass along the western edge of the

USACOE-delineated base floodplain. Because the western edge of this floodplain cannot be known with certainty, it is possible that the corridor is not located within the floodplain in this reach. The distance involved is approximately 4.02 kilometers (2.5 miles). A lateral crossing over the Compton Creek in the vicinity of SR 91 occurs in this reach as well. This crossing is envisioned as a box culvert, similar in design as one a short distance to the north, that would involve the width of the channel bottom for the length of the required crossing. This crossing may also be possible via a bridge, should hydraulic or regulatory permit conditions necessitate an alternative design.

- From approximately Del Amo Boulevard to approximately Sepulveda Boulevard, the at-grade corridor would pass through another portion of the USACOE-delineated base floodplain, also considered the western edge of this floodplain, but extending for some distance west beyond the corridor. This reach is approximately 4.83 kilometers (3 miles) in length, and it also contains the first of three lateral bridge crossings over the Dominguez Channel, approximately 0.8 kilometers (1/2 mile) north of Sepulveda Boulevard. The placement of bridge piers in the waterway would be necessary, for all three bridge crossings.

- From approximately Sepulveda Boulevard to just north of Anaheim Street, a distance of approximately 3.22 kilometers (2 miles), the at-grade corridor is located outside the USACOE-delineated base floodplain. A second lateral bridge crossing over the Dominguez Channel is located in this reach.

- From north of Anaheim Street to approximately the Terminal Island Freeway, for a distance of approximately 0.8 kilometers (1/2 mile), the at-grade corridor is again located at the westernmost edge of the USACOE-delineated base floodplain. It may also be located just outside the base floodplain in this reach, for the same reason discussed above between Greenleaf and Del Amo Boulevards. A third lateral bridge crossing over the Dominguez Channel is located in this reach. FEMA has identified a small area of potential inundation just outside the east edge of the channel that would be included in its delineated base floodplain.

- From approximately the Terminal Island Freeway to the Cerritos Channel, the at-grade corridor would again pass through a portion of the western edge of the USACOE-delineated base floodplain, for a distance of approximately 0.8 kilometers (1/2 mile).

For the longitudinal floodplain encroachments discussed above, alternative corridor locations were considered (see Chapter 2), but unfortunately these also would have resulted in substantial floodplain encroachments. Both the Los Angeles River and the Union Pacific San Pedro Branch would have resulted in longitudinal encroachments for nearly their entire length, well into the heart of the USACOE-delineated base floodplain, and therefore they constituted a less desirable location than the locally preferred project.

For each of the lateral bridge crossings discussed above, the risks potentially occurring as a result of the project would be minimal, since it will possible through design to a) provide an appropriate amount of freeboard and b) create pier designs that will not materially reduce hydraulic capacity. Hydraulic calculations would be performed to determine the effect of obstruction on the channels' flood control capacity. During final design, coordination with the

USACOE and Los Angeles County Flood Control District will continue to ensure that flood control capacity is maintained, consistent with the objectives of the Los Angeles County Drainage study.

In the event of a 100-year storm, the proposed corridor could be closed until the flooding subsides. Since such a storm would be a regional event, existing rail lines into the Ports may also be closed. The proposed project would construct trainway facilities either in a depressed or at-grade configuration, for a typical width of approximately 15.2 to 30.5 meters (50 to 100 feet). No above-ground construction that would reduce surface area subject to natural floodplain occurrence would result from the project. No adverse effects on either natural or beneficial floodplain values are therefore anticipated.

The proposed project, while potentially assisting in creating a climate conducive to sustained economic growth, would not of itself result in development activity which would be incompatible with floodplain considerations. Local jurisdictions would continue to plan and issues permits for proposed development projects in the context of floodplain considerations, consistent with local general plans.

As has been noted elsewhere in this section, coordination has been conducted with the Los Angeles County Flood Control District and the USACOE, both of which have indicated that they see no hydraulic difficulties associated with the proposed project that cannot be effectively addressed in final design.

As described in detail above, in the event of a 100-year flood event, a large portion of the alignment would be within the flood zone identified by the USACOE. From 25th Street south, the trench would intercept flows and therefore function as a temporary adjunct to the existing flood control system. This would require closure of the corridor until the water could be removed and the trainway could be inspected could be inspected. As mentioned earlier, following the completion of the USACOE improvements project, the corridor south of SR-91 would no longer be within a 100-year flood zone.

Water entering the trainway in the event of a flood could become contaminated and require treatment. This is not considered to be a substantial impact since collection and treatment facilities, including oil-water separators, will be provided as part of the project.

4.4.2.3 Groundwater Resources

Once constructed, the corridor would be completely separated from the water table and would have no effect on groundwater resources under normal operating conditions. In the event of an emergency, such as a spill of material in transport, some of these materials could permeate the surrounding soil and contaminate the groundwater. This potential impact would be minimized by the impervious nature of the corridor. In addition, an emergency response plan will be developed to rapidly respond to accidents. Therefore, this is not regarded as a substantial adverse effect.

4.4.3 Mitigation Measures

4.4.3.1 Surface Water Resources

Typical mitigation measures will be used to reduce potential impacts to surface waters from construction runoff and from erosion of barren material during the construction period, including the use of proper grading techniques and appropriate sloping, shoring and bracing of the construction site (trench). Other possible erosion control measures include scheduling construction during the dry season, staging the construction process and covering or stabilizing topsoil stockpiles.

Construction of the proposed project will require a General Construction Storm Water Permit from the Regional Water Quality Control Board (RWQCB). This permit will require the completion of a Notice of Intent, a Storm Water Pollution Prevention Plan (SWPPP) identifying appropriate erosion control measures ("Best Management Practices") and a Monitoring Program designed to check whether the measures identified in the SWPPP are adequate and properly implemented. In addition, those portions of the project requiring Section 404 (of the Clean Water Act) clearance will also require a 401 certification from the RWQCB. Based on coordination efforts conducted during the course of preparing this EIS, it is likely that nationwide permits will be appropriate for the proposed project.

In addition, a General Industrial Storm Water Permit will be required. Requirements of this permit are the same as those described above for the General Construction Storm Water Permit. The SWPPP for this permit will contain or identify pollutant sources, source controls, material inventory, preventive maintenance program, spill prevention and response program, employee training, facility inspections, record keeping and elimination of non-storm water discharges. The SWPPPs will be developed in coordination with the RWQCB.

In the event of surface water contamination during the operation of the proposed corridor, appropriate emergency procedures would be followed to ensure a minimum of damage to surface water resources. An emergency response plan (see section 4.5) will be developed and approved prior to operation of the proposed project. This plan will include information on the nature of the materials likely to be transported along the corridor, the types of remedial actions required in the event of a spill of such materials and an emergency notification and evacuation plan, if required. The plan will be developed in cooperation with adjoining jurisdictions and appropriate state agencies.

In the event that contaminated materials are encountered within the Dominguez Channel, appropriate mitigation will be developed in coordination with appropriate agencies. The area within the proposed project extending from Anaheim Street south to the Badger Avenue Bridge is within the coastal zone. This area is under the dual jurisdiction of the City of Los Angeles and the California Coastal Commission. According to established procedures, at such time as final design has been completed, an application will be made to the City of Los Angeles for a permit to construct within the coastal zone, or for a request for waiver of such permit requirement, as appropriate. Subsequently, a parallel permit or waiver will be applied for with the California Coastal Commission. Correspondence outlining this procedure is provided in Appendix F.

Based upon a telephone conversation with the staff of the California Coastal Commission (December 21, 1995), it has been determined that it appears that the proposed action would be consistent with the Coastal Act.

Also, the California Coastal Commission has previously reviewed other transportation projects funded by the FHWA through the ISTEA, such projects being associated with the Alameda Corridor (related projects) and being also located within the Coastal Zone. The Coastal Commission has issued Coastal Permits in these instances, which the Commission regards as satisfying the requirements for a consistency determination. A recent example of their approval process is the Anaheim Street Viaduct Project, a Port Access Demonstration Project (KHWA funded), for which a Coastal Development Permit was issued. The project is presently under construction. It is reasonable to expect that this process would also be followed for other similar projects associated with the Alameda Corridor, such as the crossing of the Dominguez Channel discussed above.

4.4.3.2 Floodplains

Design and construction of the improvements within the Los Angeles River, Compton Creek and Dominguez Channel will be completed in coordination with the USACOE and Los Angeles County Flood Control District. The improvements will be designed to meet the necessary 100-year carrying capacity of the channels as required by USACOE and Los Angeles County Flood Control District. The railroad bridge over the Los Angeles River will be designed so that the project piers will match existing piers, unless the spans can be lengthened to avoid or reduce pier encroachment. This information will be determined during final design. Also, efforts will be undertaken during final design to avoid or substantially reduce the degree of encroachment for all other bridge crossings.

All construction activities within the three channels would be scheduled outside of the winter flood season, defined as the period between October 15 and April 15.

Remedial options for contaminated floodwaters, should they be encountered, include siltation basins and oil/water separators.

4.4.3.3 Groundwater Resources

During construction, groundwater control may be accomplished by temporarily lowering the groundwater level, a process termed dewatering. Dewatering is considered to be the most practical method of groundwater control. Other possible methods include the use of compressed air to balance the hydraulic pressure or creating a barrier to groundwater flow within the surrounding soil by freezing or grouting, but these methods are not desirable due to their increased complexity and associated high cost.

A series of soil borings would be undertaken prior to final design and construction. These borings would identify groundwater levels where dewatering would be necessary. The results would become part of the design process, thereby enabling proper groundwater control measures to be utilized.

During dewatering operations, it may occur that the groundwater encountered has become contaminated. Should this be the case, the disposal of water removed from underground areas containing oil and tar or other hazardous materials is expected to require wastewater treatment to remove hydrocarbons and other hazardous substances before discharge. Potential remedial options for contaminated groundwater include filtration of colloidal sulfur or suspended solids, siltation basins, oil-water separators and activated carbon for removal of volatile organic compounds (VOCs). Treated water would then be discharged into a nearby storm drain. Separated materials will be trucked to a Class I or Class II disposal site. This will require a National Pollutant Discharge Elimination System (NPDES) permit for dewatering issued by the Regional Water Quality Control Board (RWQCB).

With regard to groundwater contamination resulting from a material spill after the project is operational, the same emergency response plan as discussed above would be employed.

4.5 HAZARDOUS MATERIALS

Hazardous materials are relevant to the Alameda Corridor project in two distinct ways: 1) construction of the project may be affected by hazardous materials that exist within the proposed corridor in the form of soil or ground water contamination and 2) operation of the project may affect public health through the accidental release of hazardous materials in transit along the corridor. For additional detailed discussion of hazardous materials, please see sections 4.1 and 5.6 of the EIR.

Extensive coordination with local fire and police agencies serving the Alameda Corridor was conducted during preparation of the EIR. This coordination included a series of meetings with all emergency service providers, at which were discussed the proposed project, problems in serving the Corridor identified by the providers and suggested solutions to those problems. Both the concerns that were raised and the proposed mitigation measures can be found in the EIR (Sections 4.1, 4.2, 5.5 and 5.6).

4.5.1 Impacts

4.5.1.1 Construction Impacts

Construction of the proposed project could be affected by hazardous materials if contaminated soils or groundwater are encountered during excavation activities. Excavation required for construction of the proposed project can be described by two general cases: 1) excavation for the depressed trainway in the segment extending from the Southern Pacific Transportation Company (SPTC) J Yard south to the SR-91 Freeway and 2) excavation for the construction or replacement of at-grade railroad tracks along all other portions of the corridor, including the extensions of trackage from J-Yard to the north and east, and the portion of the corridor south of SR-91. Construction of the depressed trainway would require excavation sufficient to build a 10-meter (33-foot) deep by 14-meter (47-foot) wide trench. Removal of existing tracks and grading for the construction of new tracks would require excavation likely to be no more than 1.5 meters (5 feet) deep and 12 to 24 meters (40 to 80 feet) wide, depending upon the location. The likelihood of encountering contaminated soils or groundwater is greater for the depressed railway segment since both the depth and volume of earth to be moved are greater. Of the sites shown in Figure 3-10, 15 are within the depressed railway segment of the corridor.

Twenty-two of the identified sites lie within the SPTC right-of-way. Since these sites lie directly in the path of the project, contaminated soils or groundwater would likely be encountered. The remaining 33 adjacent sites could affect the project depending on the extent of subsurface migration of contaminants and on the amount of excavation required for the project at that location. Therefore, the likelihood of encountering contamination from adjacent sites would be greatest at the J Yard, Vernon and Lynwood clusters along the depressed railway segment of the corridor. Furthermore, construction activities in the general areas identified in the phase II field sampling program would likely encounter the described contamination. It should be noted that while the likelihood of encountering contaminated soil or groundwater is greatest near the sites identified in the phase I and phase II reports, contamination may be encountered at other locations.

Due to the number of sites within or adjacent to the project corridor and results of field sampling, the potential to encounter soil or groundwater contaminated with hazardous materials is considered to constitute a potential substantial effect upon the proposed project.

Portions of the Alameda Corridor pass in proximity to oil fields. As a result, during construction of the project, it is possible that associated hydrocarbon contaminants may be encountered, including hydrogen sulfide gas. However, soil testing conducted to date suggests the likelihood of encountering hydrogen sulfide gas to be relatively low. Also, areas of the project Corridor that would be subject to deep excavation for the depressed trainway (Vernon, Huntington Park, South Gate, Lynwood and Compton) are not located nearby existing or historic oil fields.

4.5.1.2 Operational Impacts

The proposed project would consolidate all train movement to and from the Ports onto the Alameda Corridor tracks, thus increasing the amount of hazardous materials passing along the Corridor (the total quantity of hazardous materials being transported to and from the ports, however, would remain the same). While increased train travel would have the potential to increase the number of accidents within the corridor, the proposed project includes several improvements that would reduce the likelihood of train accidents. Please see Section 4.7.11, Safety and Security, for a discussion of these improvements.

In the event of an accident involving the release of hazardous materials, the proposed project is expected to reduce the effects on public health and the environment. Any release occurring within the depressed railway segment would be isolated and contained within the trench, thereby reducing the chance of people adjacent to the corridor being exposed to hazardous materials. Virtually all residential areas in close proximity to the corridor are located along the depressed trainway segment. On the other hand, an accident in the trench could trap and concentrate airborne chemicals at the accident site, thereby creating the potential for more harm to train and response personnel.

Overall, it may reasonably be concluded that:

- the expected frequency of accidents involving the release of hazardous materials would be low, and
- the potential of public exposure in the event of a hazardous materials release within the corridor would be reduced due to the containment offered by the depressed trainway, and an integrated series of safety detectors that would be provided as part of the design.

Therefore, it is concluded that the project, when compared with the No Build condition, would produce a beneficial effect on a regional basis, for the reasons stated above. However, since some accidents resulting in the release of hazardous materials may occur within the corridor at some time, and the potential harmful effects of any one accident could be serious, an emergency response plan will be developed to respond to emergencies. (See Section 4.7.11, Safety and Security, for a description of this plan.)

4.5.2 Mitigation

4.5.2.1 Construction Mitigation

Federal and state regulations require that any contaminated soil or groundwater be cleaned prior to or during construction of the project. Clean-up activities will be conducted in accordance with all applicable regulations and guidelines governing the removal and disposal of hazardous materials. In most cases these clean-up efforts will remediate the problem and no further work will be required. However, in some cases continued monitoring of particular sites may be required to ensure that no migration of existing contamination has occurred subsequent to the primary clean-up operations. It is intended that all rights-of-way to be used for purposes of constructing the Alameda Corridor will be acquired subsequent to required cleanup activities.

During final design activities, additional testing and other investigations will be conducted to more precisely determine the potential presence of hydrogen sulfide gas in the area subject to construction. Areas found to contain hydrogen sulfide gas will be avoided, if possible. Construction contract documents will include provisions describing appropriate actions to be taken by construction contractors in the event hydrogen sulfide gas is encountered. Test borings will be made in advance of construction to locate areas containing H_2S gas. Construction contractors will be required to provide all employees working in areas potentially containing H_2S gas with appropriate training in dealing with the hazards created by subsurface gas, including safety precautions and emergency procedures. Gas sensors will be used where practicable to detect the presence of H_2S, and measurements taken by these sensors will be monitored before and during construction. If determined to be appropriate and necessary, a gas collection and/or ventilation system will be installed to prevent the buildup of hazardous gas concentrations, and to reduce H_2S emissions to acceptable levels. All pertinent local, state and federal emergency preparedness and occupational safety procedures will be referenced.

A description of remediation techniques for the contaminants identified in the phase II field sampling program follows. These measures generally will only need to be implemented if the contamination is found to constitute a source of groundwater contamination, pose a substantial health risk, or could cause a release of nuisance gas upon excavation due to biological degradation. The final measures required for remediation will be determined by appropriate state and federal agencies after statistical sampling, chemical analysis and completion of a comprehensive human and environmental health risk assessment. Remedial activities will be performed on-site if practical, or at an appropriate off-site location. The remediation techniques discussed in the Leighton Phase II Environmental Site Investigation are described below.

<u>Petroleum Hydrocarbons</u>

Excavation and Off-site Landfill Disposal: Contaminated soil would be excavated and transported to an appropriate disposal site for landfill.

Excavation and Bioremediation (Land Farming): This bioremediation process consists of spreading out and enriching soil with a source of oxygen and nutrients in the presence of appropriate indigenous microorganisms to convert the soil contaminants to carbon dioxide and water.

Excavation and Bioremediation (Treatment Cells): This technique is essentially the same as the process described above, except the contaminated soil is compacted into a cube with aerating tubes rather than being spread out over a large area.

Excavation and Advanced Bioremediation (Enzyme Addition): This process involves mixing a combination of surfactants, bio-nutrients, oxygen and protein with the contaminated soil and placing it in curing piles.

Excavation and Incorporation into Asphalt Paving Materials (Recycling): This technology is based on the absorption of petroleum-based contaminants in a modified asphaltic matrix, effectively eliminating contaminant mobility.

Excavation, Encapsulation, and Disposal: In this method, the contaminated soil is mixed with silicate reagents to cause micro-encapsulation in a sand-like silica shell, thereby preventing or minimizing further leaching or reaction with the environment.

Excavation and Soil Washing: In this process, water containing a specific surfactant is introduced into the contaminated soil or sprayed onto the excavated soil stockpiles, with the contaminated runoff collected for recirculation and eventual disposal.

Excavation and Thermal Treatment: This technology involves heating the soils for a period of four to five minutes under negative pressure to volatilize the organics from the soil particles and discharge resulting exhaust according to SCAQMD standards.

Capping in Place: Containing contaminated material with a surface covering of asphalt concrete or portland cement concrete, to prevent water from percolating and leading contaminants into the groundwater.

Heavy Metals

Remediation of lead and arsenic contamination would likely be carried out through a physical/chemical solidification stabilization. This process involves wetting the heavy metals in the soil by a polysilicate-water blend, addition of appropriate cementitious materials, and curing the mixed material into a friable form for disposal. The technique of capping in place may also be used to contain heavy metals.

Chlorinated VOC's

Remediation would likely be carried out through soil vapor extraction and treatment of extracted vapors by granular activated carbon, in accordance with SCAQMD Rule 1166.

4.5.2.2 Operational Mitigation

Although the proposed project is expected to minimize the effects of an accidental release of hazardous materials within the corridor, the potential harmful effects of any one accident could be serious. Therefore, an emergency response plan will be developed in order to ensure prompt remediation of conditions potentially hazardous to public health and the environment. For a further discussion of this plan, please see Section 4.7.11, Safety and Security, of this document.

4.6 VEGETATION AND WILDLIFE

Please refer to Section 4.7 of the EIR for additional detailed discussion of Vegetation and Wildlife.

4.6.1 Impacts

If required, construction of the box culvert option at Compton Creek would affect approximately one acre of disturbed wetlands along the creek bottom. Although the wetlands are disturbed, they represent the densest wetland vegetation along this portion of Compton Creek. In addition, wetland bird species were observed utilizing this habitat. For these reasons, construction of a box culvert within this disturbed wetland could be considered a substantial impact. The remaining drainage crossings would not substantially affect biological resources.

Sections 404 and 1601 Streambed Alteration permits issued by the U.S Army Corps of Engineers (USACOE) and California Department of Fish and Game, respectively, would be necessary for the stream crossings, depending upon the amount of physical disturbance that would occur and the design of the crossings. The USACOE has indicated these proposed stream crossings may be eligible for nationwide Section 404 permits, depending upon the design of the crossings and the amount of physical disturbance that would occur. See the USACOE January 13, 1995, letter in Appendix F. To the maximum extent practicable, the project will be designed and constructed in a manner to meet the terms and conditions for a nationwide Section 404 permit.

As Dominguez Channel is influenced by tidal flows, the crossings of this channel may be required to comply with Section 10 requirements of the Rivers and Harbors Act. Section 10 of the Rivers & Harbors Act (33 U.S.C. 403) requires a permit to be obtained from the Department of the Army (Corps of Engineers) for certain construction activities occurring within waters of the United States. [Note: This permit is often issued simultaneously with a 404 Permit (where a 404 Permit is required) as a Department of Army Permit]. Section 10 activities would include, for example, placement of piers of a bridge across the Dominguez Channel. during final design and preconstruction activities, a permit application would need to be filed with the Los Angeles District Office of the USACOE. If it is determined that a Section 10 Permit is appropriate, then a Public Notice with a 30-day public review is issued, followed by the issuance of the permit. The EIS would serve as the environmental documentation to be considered in the Environmental Assessment accompanying the Public Notice. Alternatively, upon review by the USACOE of the Permit Application, a Nationwide Permit might be issued based on whether the project met the criteria for a Nationwide Permit found at 33 CFR Part 330. Issuance of a Nationwide Permit requires a 10-day agency review period. Issuance of a Department of Army Permit within the Coastal Zone requires a Consistency Determination/Certification (or issuance of a Coastal Development Permit in lieu of consistency findings) through the California Coastal Commission.

The remainder of the project corridor is highly urbanized and has been so for many years. Consultation with the California Natural Diversity Data Base (CNDDB) indicates that no state or federally listed endangered species are found within the project corridor. The federally endangered least tern was identified as the only species potentially occurring in the project study area (within one mile of the project corridor). The U.S. Fish and Wildlife Service has concurred with the finding of no adverse effect on the federally listed least tern and therefore formal consultation under Section 7 of the Endangered Species Act of 1973, as amended, is not

required (see Appendix F). The proposed project is not expected to either create or affect any habitats for sensitive species.

Existing landscaping and common urban vegetation may be removed in the course of construction. This would not be a substantial impact.

4.6.2 Mitigation

Mitigation for impacts to the disturbed wetland within Compton Creek, if required, should take place at the minimum 1:1 ratio required to maintain no net loss. The actual level of mitigation will be determined during consultations required for permitting under Section 404 of the Clean Water Act and the State Code 1601 Streambed Alteration Agreement. These permits from the USACOE and the California Department of Fish and Game will be obtained prior to construction of the proposed project.

No other impacts are anticipated and no further mitigation is required. Landscaping will be provided where possible along the corridor. Native and/or drought-resistant plants will be used where feasible.

4.7 OTHER IMPACT AREAS

4.7.1 Introduction

As described in Section 4.1, the environmental impacts associated with the locally preferred alternative (Alternative 2.1B) are similar to and/or less than those that have been described for Alternative 2.1A in the EIR (Chapters 4 and 5). The following sections summarize the discussion of impacts provided in the EIR as they apply to the locally preferred alternative for the following impact areas: topography, geology and soils; noise; ground-borne vibration; energy; land use; population and housing; acquisition and displacement; transportation and circulation; public services; safety and security; aesthetics; and economics. These are the impact areas that do not require further documentation/analysis, beyond that provided in the EIR, to meet NEPA requirements.

4.7.2 Topography, Geology and Soils

Impacts related to topography, geology and soils would not result with the No Build alternative. Such impacts may be associated with the locally preferred alternative, as described in sections 4.1.2 and 4.1.3 of the EIR. The conclusions of these sections are summarized as follows:

- Geology and Seismicity. The proposed project would be located in a seismically active area. A moderate to major earthquake on any of the major faults in the area during the construction or operation of the proposed project would subject the project to strong groundshaking. Such groundshaking could result in the failure of structures along the proposed corridor and could disrupt service along the corridor. Actual displacement or fault movement is less likely, but could occur where the active Newport-Inglewood fault zone crosses the corridor.

- Liquefaction and Other Soil Instability Issues. Substantial impacts related to potential liquefaction, seismic settlement, subsidence and landsliding and lurching are not expected during construction. Some areas along the corridor may be subject to liquefaction in the event of an earthquake during the operational lifetime of the proposed project. Soil liquefaction could cause overlying structures to fail through the loss of load bearing capacity, lateral spreading and settlement. The failure of structures along the corridor could result in a disruption of service along the corridor.

- Flooding and Tsunamis. Portions of the corridor are located in areas that have the potential for periodic inundation from various sources during the operational lifetime of the project. Flooding associated with tsunamis is highly unlikely. However, flooding as a result of a 100 or 500 year storm may affect portions of the corridor. In general, such flooding would be of limited duration and is not expected to have substantial effects upon the proposed project. If such flooding did occur it could temporarily disrupt service along the alignment. Similarly, substantial effects from tsunamis are not expected during construction of the project.

- Oil Fields. A review of maps compiled by the California Division of Oil and Gas (DOG) indicates oil wells have existed along the project corridor. These wells have been recorded as being abandoned. Although unlikely, some construction activities could disturb or expose previously abandoned oil wells. This may require reabandonment if disturbed, especially if the well was not properly abandoned initially. Improper exposure of these wells could result in the inadvertent release of hydrogen sulfide gas. This is not considered a substantial impact.

- Hazardous Materials. A discussion of this subject is provided in Section 4.5 of this EIS.

Mitigation measures are not required for potential impacts associated with flooding, tsunamis and oil fields. Mitigation measures for hazardous materials are provided in Section 4.5 of this EIS. Mitigation measures for impacts related to geology/seismicity and liquefaction are as follows:

- Geology/Seismicity Mitigation Measures. All available construction techniques for the safety of workers, pedestrians, motorists, and nearby residents in the event of an earthquake during construction will be implemented. These measures include shoring and falsework. Despite these measures, in the event of an earthquake during the construction period, damage to structures under construction could be extensive.

  Careful soil testing for purposes of foundation design will be conducted and correction of weakness in soil strength will be undertaken where practicable and necessary. State-of-the-art seismic design will be used to lessen the severity of the potential effect of earthquakes during the project's operation. The proposed project will be designed in accordance with all applicable codes and regulations and plans will be approved by a state licensed civil engineer.

- Liquefaction Mitigation Measures. All areas of historically high or perched ground water levels along the corridor (Huntington Park, South Gate, Lynwood, Compton, Carson, and the harbor area south of Anaheim Street) will be analyzed in detail during project design to verify the potential for liquefaction. Should soils subject to liquefaction be found below any the project site, then site specific engineering techniques (e.g. importation of stable material, compaction of soils, permanent dewatering, and attachment of deep-set piles to bedrock or lower, denser soils), will be implemented.

4.7.3 Noise

Section 4.4 of the EIR describes the analysis that was undertaken to identify potential noise impacts associated with the Alameda Corridor project alternatives. This analysis involved the collection of existing noise measurement data at noise sensitive locations along the corridor, the projection of noise levels for the future under various project alternatives, the identification of project impacts on sensitive receptors, and the development of mitigation measures for those impacts. A noise survey was conducted to document existing noise levels along the Alameda Corridor. This survey shows that ambient maximum hourly Leqs (daytime energy equivalent sound levels) ranged from 57 to 69 dBA and 24-hour Community Noise Equivalent Levels

(CNELs) ranged from 61 to 73 dBA. Existing noise along the Corridor is dominated by traffic on Alameda Street and trains operating on the SP tracks. In some areas, noise from industrial activities or aircraft in the approach pattern to LAX are important factors.

Because the locally preferred alternative (Alternative 2.1B) would involve only reconstruction of the existing four lanes along Alameda Street, it would not result in increased traffic on Alameda Street. Its noise impacts would be less than those identified for the most similar EIR alternative (Alternative 2.1A), which would have involved increasing the capacity of Alameda Street from four lanes to six. A supplemental analysis was conducted for this EIS to refine the analysis previously presented in the EIR, to identify the location and extent of noise impacts under Alternative 2.1B and to further specify the mitigation measures required for those impacts. This section describes this supplemental analysis and its conclusions and summarizes the EIR analysis conclusions that remain unchanged for Alternative 2.1B (i.e., construction impacts and qualitative regional effects). It should be noted that the noise impacts identified for Alternative 2.1A would be much more extensive than have been projected for Alternative 2.1B. Moreover, the proposed project makes no major changes to the vertical or horizontal alignment of Alameda Street, and therefore it does not meet the criteria that define a Type I project.

4.7.3.1 Noise Impact Criteria

The noise impact criteria used in the EIR were developed to account for both traffic and train noise, as described in Section 4.4.2 of the EIR. Typically, proposed projects involving traffic components are evaluated using Federal Highway Administration (FHWA) standards. These standards are based on the noise levels during the loudest hour of the day, which is usually the peak traffic hour. In the noise analysis for the Alameda Corridor project, train traffic would be distributed throughout the day and night. Using the typical FHWA peak hour noise impact criteria to evaluate this type of noise source underestimates noise impacts because it does not include an allowance for the sensitivity of most people to nighttime noise. FHWA noise criteria would not be appropriate because the proposed project would not result in any major changes in vertical or horizontal roadway alignment, and because no expansion of capacity would result. To more appropriately account for noise during the nighttime hours, Community Noise Equivalent Level (CNEL) was selected to characterize residential noise levels. CNEL is a measure of the total sound energy over a 24-hour period with adjustments that account for evening and nighttime noise sensitivities. As a complement to this, noise impacts for non-residential sensitive receptors (e.g., schools, churches and parks) have been assessed using the daytime energy equivalent level (Leq), a straight measure of sound energy without any adjustments for nighttime and evening events, because primary use of facilities such as these would be made during daytime hours.

Noise impact criteria used to assess the noise effects of the locally preferred alternative are therefore as follows:

- A *Severe* impact would occur when the projected CNEL with trains and auto traffic on Alameda Street is greater than 72 dBA and the CNEL with trains alone is greater than 67 dBA.

- A *Substantial* impact would occur when the CNEL with projected trains and traffic on Alameda Street is greater than 67 dBA (which is approximately equivalent to the FHWA standard with normal day/night traffic distribution) and causes an

increase relative to future conditions without the project of at least 3 dBA. This is possible only when train noise is the dominant noise source.

The projected CNEL of trains must be at least 64 dBA for there to be an impact. If projected train noise exceeds 67 dBA and the total projected CNEL exceeds 72 dBA, there would be a severe impact.

4.7.3.2 Impacts of the No Build Alternative

Along Alameda Street, under the No Build alternative, freight rail service would increase in proportion to the estimated Southern Pacific share of the market, or an estimated 39 trains per day in the year 2020. Applying the noise criteria stated above, this would result in an estimated 69 residences being subjected to severe noise impact, one in Segment A and 68 in Segment C.

4.7.3.3 Operational Impacts Along the Alameda Corridor

Table 4-12 identifies the number of residences that would be subject to adverse noise impacts with Alternative 2.1B in the year 2020 assuming full implementation of freight rail consolidation. These numbers are much lower than those anticipated for Alternative 2.1A because Alternative 2.1B would not increase traffic levels on Alameda Street. As explained in Section 4.7.3.5, the proposed project would have a substantial benefit, with regard to noise impacts, at the regional level.

The proposed project would result in a total of 92 residences being subject to noise impacts exceeding criteria that would require consideration of abatement measures (see Table 4-12 and Section 4.7.3.1). In addition, noise impacts exceeding abatement threshold criteria are projected for two institutional buildings: the Exceptional Adult Education Center, located at 310 East El Segundo Boulevard in Compton, and the Church of God of Prophecy, located at 218 Poplar Street in Compton.

4.7.3.4 Operational Mitigation Measures

Noise impacts on residences between Southern Avenue and Tweedy Boulevard, at the Dominguez Seminary and between Dominguez Street and I-405 will be mitigated with the placement of noise barriers or soundwalls at the locations shown in Figure 4-2. If barriers are used, where the trainway is depressed, these barriers could extend about 3 to 4.5 meters (10 to 15 feet) above the top of the trench. For at-grade locations, sound barriers could be 4.5 meters (15 feet) in height. Detailed designs for the barriers or other sound attenuation devices will be developed during the final design phase which would mitigate nearly all of the adverse noise impacts, with the exception of the location discussed below.

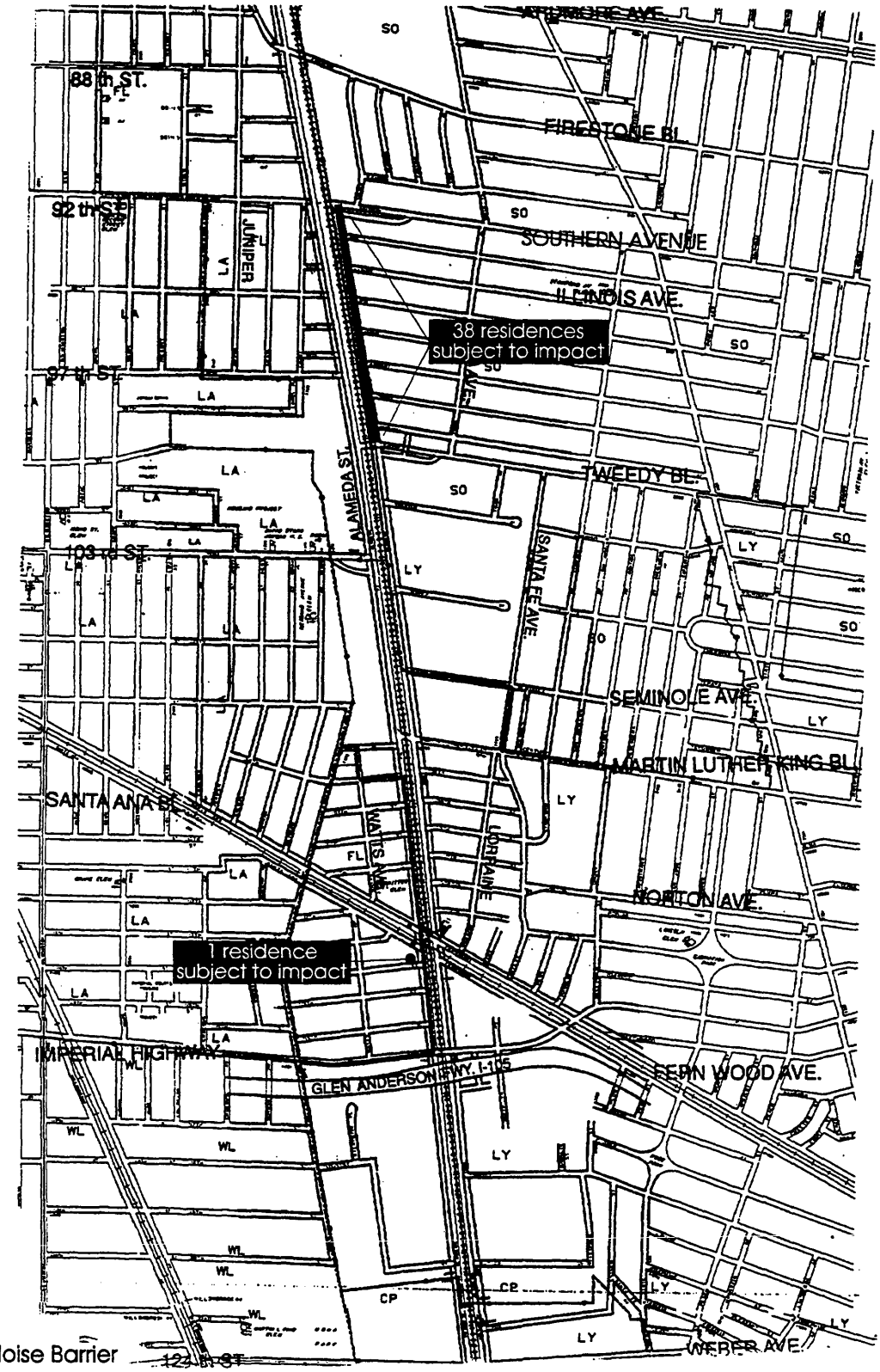
TABLE 4-12
NUMBER OF RESIDENCES IN THE ALAMEDA CORRIDOR IN NOISE IMPACT ZONES IN YEAR 2020 WITHOUT MITIGATION

SEGMENT	LOCATION	ALTERNATIVE	NUMBER OF RESIDENCES		DESCRIPTION
			SEVERE	SUBSTANTIAL	
C	Southern to Tweedy	Project	38	0	Noise impact is projected for the first row of residences east of Alameda.
	Tweedy to Imperial Highway	Project	1	0	Noise impact is projected for one residence west of Alameda and south of Santa Ana Boulevard.
	Rosecrans to Compton	Project	1	0	Noise impact is projected for residence west of Alameda between Cedar and Maple Streets.
	Compton to Greenleaf	Project	2	0	Noise impact is projected for two residences west of Alameda and north of Raymond Street.
D	Dominguez Seminary	Project	0	5	Noise impact is projected for five residences in the seminary buildings.
	Dominguez to I-405	Project	1	44	Noise impacts is projected for the second row of buildings (the first row of residences) east of the alignment.
TOTAL		Project	43	49	

Note: No impacts were estimated for Segments A and B, Alternatives 2.1A and 2.1B are identical in these segments.

Source: Harris Miller Miller & Hanson Inc., 1994.

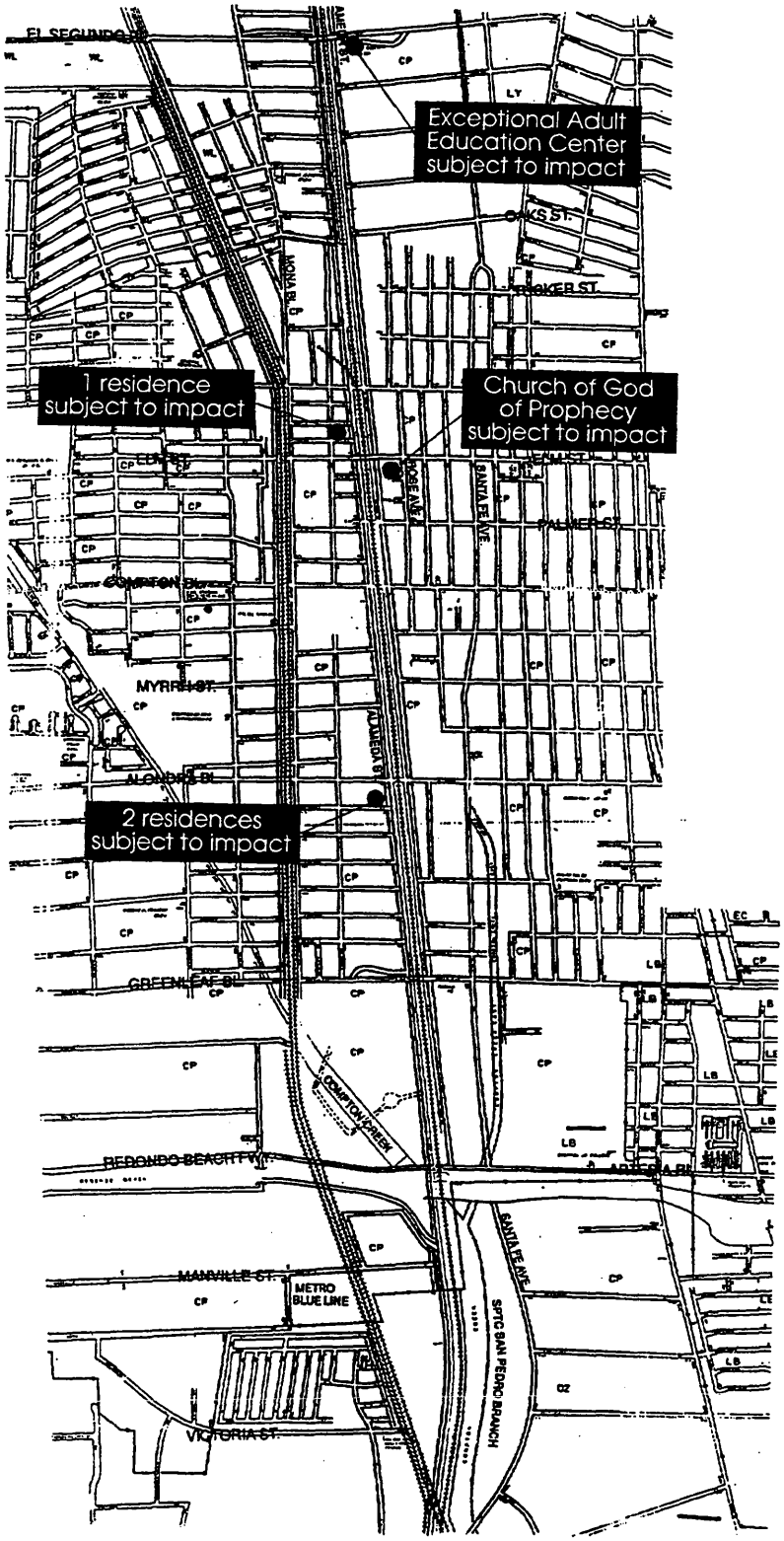
At locations where there are isolated sensitive receptors affected by noise, the construction of noise barriers would not be cost effective. There are six locations where this would occur: (1) a single residence west of Alameda and south of Santa Ana Boulevard; (2) a single residence between Rosecrans Avenue and Compton Boulevard west of Alameda, between Cedar and Maple Streets; (3) two residences between Compton Boulevard and Greenleaf Boulevard, west of Alameda and north of Raymond Street; (4) the Exceptional Adult Education Center on the east side on Alameda and south of El Segundo Boulevard; (5) the Church of God Prophecy, on the east side of Alameda south of Elm Street; and (6) four residences along Alameda Street just south of Southern Avenue. The residences are located at the intersections of Alameda and streets that cross the Corridor, and therefore noise walls could not be used to mitigate noise impacts because the walls would block traffic, or other physical conditions would prevent the needed attenuation by means of soundwalls.



Source: Myra L. Frank and Associates, Inc., 1994.

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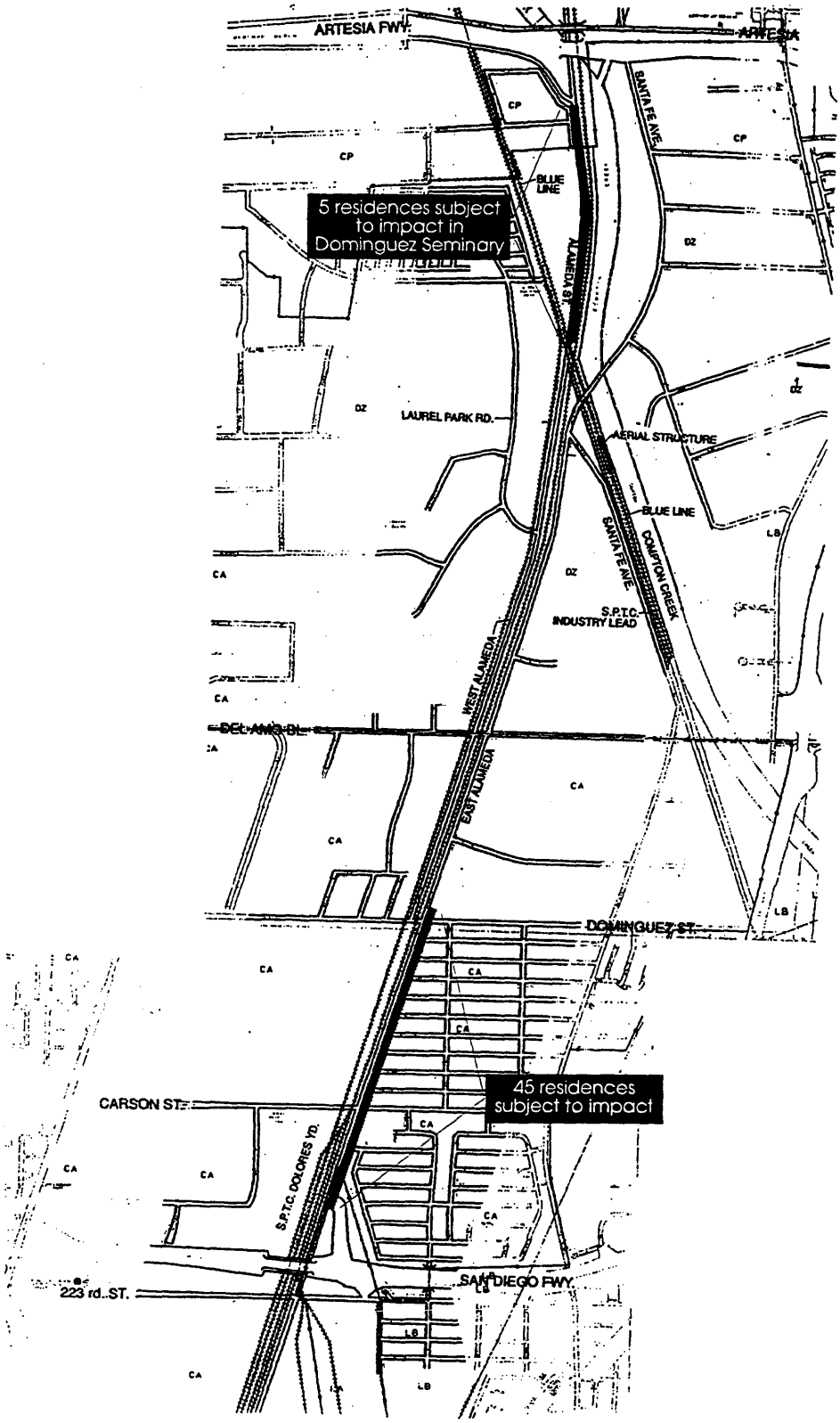
FIGURE 4-2	Train Noise Barrier Locations	Alameda Corridor EIS



Source: Myra L. Frank and Associates, Inc., 1994.

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FIGURE 4-2	Train Noise Barrier Locations	Alameda Corridor EIS



Train Noise Barrier

Source: Myra L. Frank and Associates, Inc., 1994.

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FIGURE 4-2	Train Noise Barrier Locations	Alameda Corridor EIS

4.7.3.5 Regional Effects

Without the consolidation project, projected increases in rail traffic along the UP and AT&SF corridors and the increase in rail and street traffic along the Alameda Corridor would cause a substantial increase in noise levels along these corridors. To estimate regional noise impacts, noise was projected using the same models used to predict noise levels for the Alameda Corridor. The results of the *San Pedro Ports Access Study* (SCAG, 1985) were used to approximate the numbers of people living within the noise impact area of each rail line. The values from the Port Access Study that were used included: total number of residential buildings within 500 feet of the tracks for each corridor, an average of 35% of the buildings within the corridor being multi-family, and the average multi-family building having four units. The number of residences affected would increase from 53 (exposed to 1992 traffic volumes) to 182 (projected year 2000 traffic volumes).

As a result of the consolidation, fewer trains are expected to use the SP Wilmington Branch, the Union Pacific (UP) San Pedro Branch, and the Burlington Northern Santa Fe Corporation (BNSF) Harbor Subdivision. These alignments pass through a number of residential areas; diverting the train traffic to another corridor would improve the environment along these corridors. Table 4-13 shows estimated residential noise exposure in other regional rail lines in the year 2020.

TABLE 4-13
YEAR 2020 REGIONAL RAIL RESIDENTIAL NOISE EXPOSURE

Rail Line	Alternative	Number of Affected Residences[1]	
		Severe	Substantial
SP San Pedro Branch	No Build	100	0
	Project	43	49
SP Wilmington Branch	No Build	597	995
	Project	0	0
UP San Pedro Branch	No Build	842	1,693
	Project	0	180[3]
ATSF Harbor Subdivision	No Build	1,033	1,806
	Project	0	0
TOTAL	No Build	2,572	4,494
	Project	93	229

Notes: (1) Based on an estimated 4.28 persons per household (EIR, Table 5-2).
(2) Without soundwall mitigation.
(3) Some residual service will remain on the Union Pacific San Pedro Branch, despite implementation of the proposed project, which is in close proximity to residences in the North Long Beach Area.

Source: Harris Miller Miller & Hanson Inc., 1994.

With the consolidation project, total regional noise impacts would be much lower than is projected for the 2020 No Build alternative; however, there would be some increase in noise impact along the Alameda Corridor as described above, for which mitigation would be necessary.

4.7.3.6 Construction Impacts and Mitigation Measures

Section 4.4.4 of the EIR discusses the types of equipment that would be used to construct the project and the associated noise levels. The total noise level (Leq) during a typical 12-hour, daytime construction workday would be about 90 dBA at 15 meters (50 feet) from the construction site. As with any construction project near a residential area, this project has the potential of creating substantial noise intrusion to communities along the corridor during its construction period.

There are a number of measures that will be taken to reduce noise intrusion. These include noise monitoring to ensure that contractors take all reasonable steps to minimize noise, inspections and possibly noise testing of equipment to ensure that all equipment on the site is in good condition and effectively muffled, and an active community liaison program. Also, where soundwalls are required to attenuate operational noise, these walls can sometimes be constructed at the outset of construction, where conditions permit. This program will keep residents informed about construction plans so they can plan around periods of particularly high noise levels and it will provide a conduit for two-way communication between area residents and the project.

The primary construction mitigation measure will be the inclusion of specific noise control requirements in the construction specifications. These will require the contractor to:

1. *Perform all construction in a manner to minimize noise.* The contractor will be required to select construction processes and techniques that create noise levels as low as is practicable. Examples are using cast-in-drilled-hole piles instead of impact pile driving, mixing concrete offsite instead of on-site, and using hydraulic tools instead of pneumatic impact tools.

2. *Use equipment with effective mufflers.* Contractors will be required to employ equipment fitted with the most effective commercially available mufflers.

3. *Perform construction in a manner to maintain noise levels below specific limits in the vicinity of noise sensitive land uses.*

4. *Perform noise monitoring to demonstrate compliance with the noise limits.* Independent noise monitoring will be performed to check compliance in particularly sensitive areas.

5. *Minimize construction activities during evening, nighttime, weekend and holiday periods.* Permits will be required before construction begins in noise sensitive areas during these periods.

6. *Select haul routes that minimize intrusion to residential areas.*

4.7.4 Ground-borne Vibration

Ground-borne vibration impacts for the locally preferred alternative would be the same as described for Alternative 2.1A in Section 4.5 of the EIR. Both construction of the Alameda Corridor project and freight train operations could create ground-borne vibration impacts. These

potential impacts and mitigation measures for these impacts are summarized below. Substantial ground-borne vibration impacts would not occur with the No Build Alternative.

4.7.4.1 Construction Impacts and Mitigation Measures

Construction activities have the potential to create annoying levels of ground-borne vibration, and occasionally in cases of extremely heavy construction, a few activities have the potential to create vibration sufficient to cause building damage. It is not anticipated that construction activities associated with the proposed Alameda Corridor project would produce vibration substantial enough to cause damage to structures. Following is a summary of construction equipment and procedures with the potential of causing annoying or damaging vibration:

- Pile Driving: Impact pile driving can cause daytime annoyance out to a distance of approximately 76 meters (250 feet) and potential damage to structures at distances less than about 12 meters (40 feet) from the pile driving. No structures are located within 12 meters (40 feet) of the depressed trainway, and typically structures are located at least 30 meters (100 feet) away.

- Vibratory Compaction and Pile Driving: Vibratory compaction equipment is oftentimes used for compacting roadway subgrades or driving sheetpile. It is not uncommon for this type of equipment to cause intrusive vibration in nearby buildings. The shaking sometimes will cause items sitting on shelves or hanging on walls to fall. The actual levels are directly dependent on the manner in which the equipment is operated and the separation distance.

- Tracked Excavation Equipment: Equipment used for excavation has the potential of causing intrusive vibration. The main sources of vibration are dropping the bucket into the trench to pick up the next load of dirt and moving from one site to another.

- Tracked Vehicles: Tracked vehicles such as bulldozers can create substantial vibration during earth moving operations. A large bulldozer could result in vibration that would cause daytime annoyance at residences up to 23 meters (75 feet) away.

- Trucks: Ground-borne vibration from pneumatic tire vehicles on streets, even heavy trucks, is rare unless there is some sort of irregularity or bump in the road surface. Loaded trucks on construction surfaces can create annoying vibration at distances up to 61 meters (200 feet) away.

- Pre-construction Survey: A survey of physical and structural conditions existing along the Corridor will be conducted prior to beginning construction. The results of this survey will be used to determine the nature and extent of vibration-related impacts which may occur as a result of the project.

Because nearby industrial and other structures are typically separated from the depressed trainway by distances of 30 meters (100 feet) or more, it is very unlikely that the potential for structural damage would exist, and it is expected therefore that ground-borne vibration from construction activities would cause only intermittent, local intrusion into communities along the Alameda Corridor.

Following are some procedures that will be used to minimize the potential for annoyance or damage from construction vibration:

- Construction techniques that create high vibration levels will be prohibited or severely limited. Processes such as pile driving will be prohibited at distances less than 76 meters (250 feet) from residences, unless no other alternative is possible by virtue of soil conditions or other engineering constraints. Setting piles using predrilled holes or the cast-in-drilled-hole (CIDH) method will eliminate most potential for vibration impact from pile driving, and therefore will be established as the preferred technique.

- Procedures that contractors can use in vibration sensitive areas will be restricted to techniques offering the least potential for producing intrusive vibration, within the limits of practicality.

- Monitoring during vibration intensive activities will be conducted and corrective actions will be imposed if vibration exceeds established criteria.

- Vibration intensive activities such as pile driving will be restricted to weekdays during daytime hours.

4.7.4.2 Train Vibration Impacts and Mitigation Measures

Operation of trains within the corridor on a daily basis under the locally preferred alternative would have the potential for vibration impact at one residence at the south west corner of Alameda and Santa Ana Boulevard, which is about 30 meters (100 feet) from the track centerline. This assessment is based on the application of annoyance criteria of 72 dBA and 77 dBA for vibration from rail cars and locomotives, respectively. These criteria are estimated to be exceeded by only 1 dBA at this location, and therefore the assessment of impact is marginal.

The impact at the residence near Santa Ana Boulevard could be removed with installation of a ballast mat. To be effective, the mat would need to be approximately 200 feet long, and would have to be installed under both tracks. Assuming a 10 foot width under each track and an approximate cost of $20/foot, the cost for the ballast mat would be approximately $80,000 not including any special subgrade preparation needed for the ballast mat support. This is not expected to be a cost effective approach for mitigating vibration at one residence. Final design activities will yield more information that can be used to more accurately assess the potential for impact, including the precise distance from the project to the affected residence and certain engineering construction details, such as the structural details and materials of the trench. A further analysis of the vibration potential at this location will be conducted. To the extent that such vibration potential can be effectively attenuated through the design of the proposed project, appropriate design modifications will be made.

4.7.5 Energy

4.7.5.1 Construction

As described in Section 4.6 of the EIR, construction of the proposed project would result in the consumption of fossil fuels. However, the amounts consumed (on the order of 17,411 liters

(4,600 gallons) of gasoline and 12.1 million liters (3.2 million gallons) of diesel fuel) are not considered substantial in comparison with regional fuel consumption and supply. Nevertheless, in the interest of promoting energy efficiency, the following mitigation measures will be implemented:

- Disposal sites will be selected to be as close as practicable to the corridor, to minimize haul distances and excavation-related fuel consumption.

- Existing rail steel and lumber will be reused where practicable during the construction process.

- Asphalt taken up from roadways will be recycled, to the extent that this is practicable and cost-effective.

- Carpooling will be arranged among construction workers, perhaps involving the use of project vans.

4.7.5.2 Operation

By providing a more direct and efficient freight route, the proposed project would result in a reduction in the amount of diesel fuel consumed by locomotives, as compared with the No Build alternative. An estimated five (5) percent of locomotive diesel fuel savings would be realized in the region on a daily basis. See Section 4.6.3 of the EIR for the quantitative analysis.

Fuel consumed by automobiles and trucks in the future would be essentially the same with or without the project, although there would be a slight improvement in fuel consumed by motor vehicles that would otherwise be idling at grade crossings. The Alameda Corridor would accommodate vehicular travel, but it would not on its own promote such travel.

The daily operation of the corridor would use minor amounts of electricity for various functions, such use not being considered substantial. The following conservation measures will be implemented, however:

- Area lighting systems will use efficient luminaires and will be designed for an efficient placement of individual fixtures.

- Corridor buildings and facilities will incorporate energy efficiency requirements contained within California building codes.

4.7.6 Land Use

The locally preferred alternative would involve the reconstruction of existing Alameda Street, the provision of track improvements to an already existing railroad corridor, and an increase in the use of the railroad corridor. Because these actions do not represent a major change to already existing uses and they do not impede the achievement of local planning goals as expressed in published general plans for the municipalities through which the project passes (see Section 5.1 of the EIR for a description of these plans and detailed land use analysis), they would not result in substantial adverse land use impacts. On the contrary, when the corridor is completed and operational, the resulting improved transportation corridor would promote land use objectives,

since traffic delays, safety considerations and other impediments would be removed. However, to the extent that increased use of the railroads may result in effects that are inconsistent with existing surrounding land uses, namely noise impacts, adverse impacts could result. See Section 4.7.3 for a discussion of noise impacts. Potential land use impacts in terms of acquisitions are discussed in Section 4.7.8, below. Because the proposed project would not result in direct adverse effects on land use, mitigation measures are not required. Mitigation measures pertaining to acquisitions and noise are discussed in those respective sections.

4.7.7 Population and Housing

For a detailed discussion of population and housing, please see Section 5.2 of the EIR.

4.7.7.1 Effects on Local Population

Alternative 2.1B would not involve the acquisition of residential property or the displacement of residents. It would not cause residential growth in the project area, redistribution of the population or other changes that would have substantial effects on project area demographics.

Under the No Build alternative, local population changes would occur as a result of development, market and other influences in the area.

4.7.7.2 Effects of Housing Removal on Local Housing Stock

The locally preferred alternative would not remove existing housing or otherwise affect the local housing stock. Under the No Build alternative, some additional housing will be needed to accommodate the projected increase in population for the various communities along Alameda Street, although the immediate vicinity of Alameda Street would be not be the target area for satisfaction of that need.

4.7.7.3 Barriers to Existing Neighborhoods

As compared to the existing at-grade railroad, the depressed trainway provided in the locally preferred alternative may be perceived by some as a physical barrier between neighborhoods through which it travels; however, the absence of at-grade trains would constitute in a practical sense the removal of an existing barrier between neighborhoods. Also, because existing pedestrian access across the railroad is unsafe and illegal, removal of this potential access would in fact provide a safety benefit. In addition, because the locally preferred alternative would provide at-grade bridge crossings over the depressed trainway at all existing railroad crossings, it would not limit and may enhance vehicular and pedestrian access to neighborhoods on both sides of the trainway. Overall, the locally preferred alternative is not expected to increase the division of neighborhoods, and it is not considered a barrier to existing neighborhoods.

4.7.7.4 Mitigation Measures

Because the proposed project would not result in adverse effects regarding housing, population or neighborhoods, mitigation measures are not required.

4.7.8 Acquisition and Displacement

For detailed discussion of acquisition and displacement, see Section 5.3 of the EIR.

4.7.8.1 Impacts

Implementation of the Alameda Corridor project would involve the purchase of existing railroad rights-of-way from the three railroads serving the area (primarily from the Southern Pacific) that would comprise the consolidated corridor. Also involved would be a number of publicly owned or utility parcels that would be used in part for the project. Because the locally preferred alternative involves reconstruction rather than widening of the Alameda roadways and at-grade bridges rather than above grade flyovers, private property acquisitions required for this alternative would be limited to selected locations at the north and south ends of the corridor. The locally preferred alternative would require partial acquisition of 16 private properties and full acquisition of 40 properties. A number of these properties are currently vacant (11 of the 40 properties to be fully acquired and 3 of the 11 properties to be partially acquired). The remainder of these properties currently support commercial or industrial uses. The proposed project does not require acquisition of residential property. Property acquisition estimates are based on current engineering design information.

Full acquisitions would require relocation of employees and businesses to other locations; partial acquisitions generally would not require relocation.

The number of employees displaced as a result of full property acquisitions was estimated based on the following employee generation factors taken from The Fiscal Impact Handbook, (Burchell & Listokin 1978): 1 employee per 23 square meters (250 square feet) of office space; 1 employee per 46.5 square meters (500 square feet) of residential space; and 1 employee per 48.8 square meters (525 square feet) of industrial/warehouse space (an average of 1 employee per 69.7 square meters (750 square feet) of warehouse space and 1 employee per 27.9 square meters (300 square feet) of industrial space). About 1,200 employees would be displaced as a result of the proposed project.

The No Build alternative would not result in the acquisition of property.

4.7.8.2 Mitigation Measures

Provisions of the Federal and State law regarding relocation and assistance (California Government Code, Chapter 16, Section 7260 et sea., "Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970") require the Federal Highway Administration (FHWA), the Federal Railroad Administration and the Alameda Corridor Transportation Authority, or its member agencies, to provide payments and relocation services to eligible businesses concerns and non-profit organizations displaced by the project. Within the State of California, Caltrans typically functions as the agent for the FHWA in this process.

Payments include reimbursements for moving costs, the actual direct losses of tangible personal property that the business is entitled to if it elects not to move and the actual reasonable expenses in searching for replacement business up to $1,000. Businesses are also eligible to receive a payment of up to $10,000 for expenses actually incurred in relocating and

reestablishing a business. See section 5.3.6 of the EIR for a detailed discussion of payments and relocation services provided to displaced businesses.

4.7.9 Transportation and Circulation

Section 5.4 of the EIR presents an analysis of traffic impacts associated with various project alternatives and describes in detail the methodology used in this analysis. In brief, the analysis examines traffic operations in a study area that includes 116 existing and proposed intersections. Growth rates were obtained from the EMME/2 traffic model for the PM peak hour. The Critical Movement Analysis (CMA) methodology was used to calculate volume-to-capacity (V/C) ratios and corresponding level of service (LOS) at study intersections to analyze the traffic impacts of the alternatives. Substantial project traffic impacts are identified for intersections where the V/C ratio with the project exceeds 0.90 (LOS E or greater) and exceeds the No Build condition V/C ratio by more than 0.02. The following sections summarize and supplement the EIR analysis in order to describe the impacts associated with the No Build and Locally Preferred Alternatives. It should be noted that the Alameda Corridor is included as part of the Los Angeles County Congestion Management Program (CMP). Further, Alameda Street is a designated CMP highway route. (See Appendix F for evidence of coordination with the MTA on this subject).

4.7.9.1 No Build Alternative

Impacts

Section 5.4 of the EIR describes traffic conditions in 2010 and 2020 without the project. These conditions would occur with the No Build alternative. The EIR analysis of No Build conditions demonstrated the importance of the Alameda Corridor for both vehicular and truck traffic and concluded the following:

- Between 1990 and 2010, study area vehicle miles of travel (VMT) is expected to increase by 20.6 percent.
- Between 1990 and 2010, VMT along Alameda Street is expected to increase by 76.8 percent.
- Between 2010 and 2020, study area VMT is expected to increase by an additional 12.9 percent.
- Between 2010 and 2020, VMT along Alameda Street is expected to increase by an additional 23.6 percent.
- By the year 2020, the study area will be carrying over 36 percent more traffic than in 1990, and Alameda Street will be carrying 118 percent more traffic in 2020 than in 1990.

No Build conditions were projected, accounting for anticipated freeway and street projects along with projected future growth rates. See Tables 4-14 and 4-15 for projected LOS at each study area intersection in 2010 and 2020, respectively. Under the No Build Alternative, by the year 2020, 61 study area intersections are expected to operate poorly, i.e., at levels of service E or F (see EIR Table 5-25 for level of service descriptions). This reflects a deterioration in traffic conditions as compared to existing conditions. Two study area intersections, Firestone

Boulevard/Alameda Street West and Imperial Highway/Alameda Street West, currently operate at Level of Service F during the PM peak hour.

4.7.9.2 Locally Preferred Alternative

Operational Impacts

The reconstruction of Alameda Street and the provision of at-grade street crossings over the depressed trainway at existing Alameda cross streets, the addition of new left turn pockets at Alameda Street intersections and improved signalization along Alameda Street under the locally preferred alternative would improve traffic conditions at nearly all study area intersections. However, there are two locations at which the locally preferred alternative could result in adverse traffic impacts: (1) at the Santa Fe Avenue overcrossing above Washington Boulevard; and (2) in the vicinity of the closure of Auto Drive South. These are described in Section 5.4 of the EIR.

- Santa Fe Avenue Overcrossing. With the project, Santa Fe Avenue would be grade separated from the corridor and Washington Boulevard by means of an aerial flyover. This project component was included in the EIR under Alternative 2.1A.

- Auto Drive South Closure. The closure of Auto Drive South will force some traffic toward Greenleaf Boulevard to the north and Artesia Boulevard to the south. This project component was included in the EIR under Alternative 2.1A.

Because Alameda Street would be reconstructed generally in its existing configuration, it would not attract additional traffic from other major north/south roadways in the region, as would alternatives previously considered that involved widening. The removal of railroad/roadway grade crossings would improve the flow of traffic on Alameda cross streets by eliminating delays due to trains passing. In addition, the provision of left turn pockets and improved signalization would improve the flow of traffic on Alameda Street. Overall, as compared to conditions in the future without the project (i.e., the No Build alternative), the locally preferred alternative would improve traffic flow along and across the corridor.

Table 4-14 shows the results of the CMA intersection analysis for the locally preferred alternative at study intersections during the PM peak hour for the year 2010. Except in the vicinity of the Santa Fe Avenue grade separation, intersection levels of service would improve. The intersections near Santa Fe Avenue would have lower levels of service with the project, but these decreases would not exceed the threshold criteria for substantial impacts.

Table 4-15 shows the results for the year 2020. The V/C ratios at study area intersections would improve with the exceptions of the intersections of 25th Street and Santa Fe Avenue, and Greenleaf Boulevard and Alameda Street. In each case, the V/C ratio would increase by more than 0.02 and the ultimate V/C ratio would exceed 0.90, so that the threshold criteria for impacts would be exceeded.

TABLE 4-14: 2010 PM PEAK CONDITIONS

INTERSECTION NAME		NULL		PREF. ALT. 2.1B		COMPARISON	
		V/C RATIO	LEVEL OF SERVICE	V/C RATIO	LEVEL OF SERVICE	CHANGE IN V/C	EXCEEDS CRITERIA?
Segment A							
15th St	Santa Fe Av	0.46	A	0.57	A	0.11	No
Washington Bl	Santa Fe Av	0.72	C	0.28	A	-0.44	No
25th St	Santa Fe Av	0.55	A	0.76	C	0.21	No
Segment B-1							
41st St	Alameda St W	0.74	C	0.74	C	0.00	No
38th St	Alameda St E	0.57	A	0.47	A	-0.10	No
Vernon Av	Alameda St W	0.55	A	0.51	A	-0.04	No
Vernon Av	Alameda St E	0.50	A	0.45	A	-0.05	No
55th St	Alameda St W	0.67	B	0.61	B	-0.07	No
55th St	Alameda St E	0.41	A	0.38	A	-0.03	No
Slauson Av	Alameda St W	0.80	D	0.71	C	-0.09	No
Slauson Av	Alameda St E	0.56	A	0.44	A	-0.12	No
Segment B-2							
Randolph St	Alameda St W	0.61	B	0.57	A	-0.04	No
Randolph St	Alameda St E	0.36	A	0.23	A	-0.13	No
Gage Av	Alameda St W	0.72	C	0.71	C	-0.01	No
Gage Av	Alameda St E	0.34	A	0.31	A	-0.03	No
Florence Av	Alameda St W	0.66	B	0.63	B	-0.03	No
Florence Av	Alameda St E	0.42	A	0.39	A	-0.03	No
Nadeau St	Alameda St W	0.79	C	0.78	C	-0.01	No
Nadeau St	Alameda St E	0.41	A	0.38	A	-0.03	No
Segment C							
Firestone Bl	Alameda St W	0.81	D	0.71	C	-0.10	No
92nd St	Alameda St W	0.81	D	0.74	C	-0.07	No
Southern Av	Alameda St E	0.75	C	0.61	B	-0.14	No
Tweedy Bl	Alameda St W	0.73	C	0.67	B	-0.06	No
Tweedy Bl	Alameda St E	0.41	A	0.31	A	-0.10	No
ML King Bl	Alameda St W	0.70	C	0.63	B	-0.07	No
ML King Bl	Alameda St E	0.40	A	0.32	A	-0.08	No
Santa Ana Bl N	Alameda St W	0.65	B	0.61	B	-0.04	No
Fernwood Av	Alameda St E	0.63	B	0.50	A	-0.13	No
Imperial Hwy	Alameda St W	0.91	E	0.82	D	-0.09	No
Imperial Hwy	Alameda St E	0.58	A	0.45	A	-0.13	No
Lynwood Rd	Alameda St W	0.55	A	0.45	A	-0.10	No
Lynwood Rd	Alameda St E	0.43	A	0.29	A	-0.14	No
124th St	Alameda St W	0.48	A	0.37	A	-0.11	No
Weber Av	Alameda St E	0.49	A	0.36	A	-0.13	No
El Segundo Bl	Alameda St W	0.58	A	0.47	A	-0.11	No
El Segundo Bl	Alameda St E	0.45	A	0.30	A	-0.15	No
134th St	Alameda St W	0.50	A	0.39	A	-0.11	No
Pine Av	Alameda St E	0.55	A	0.42	A	-0.13	No
Elm St	Alameda St W	0.68	B	0.47	A	-0.21	No
Elm St	Alameda St E	0.89	D	0.64	B	-0.25	No
Palmer St	Alameda St W	0.55	A	0.34	A	-0.21	No
Palmer St	Alameda St E	0.43	A	0.22	A	-0.21	No
Compton Bl	Alameda St W	0.75	C	0.55	A	-0.20	No
Compton Bl	Alameda St E	0.70	C	0.50	A	-0.20	No
Laurel Street	Alameda St W	0.59	A	0.39	A	-0.20	No
Laurel Street	Alameda St E	0.15	A	0.15	A	0.00	No
Alondra Bl	Alameda St W	0.91	E	0.71	C	-0.20	No
Alondra Bl	Alameda St E	0.67	B	0.44	A	-0.23	No
Greenleaf Bl	Alameda St W	0.78	C	0.67	B	-0.11	No
Greenleaf Bl	Alameda St E	0.53	A	0.33	A	-0.20	No
S Auto Dr	Alameda St W	0.52	A	0.30	A	-0.22	No
S Auto Dr	Alameda St E	0.31	A	0.06	A	-0.25	No

Source: Katz, Okitzu Associates, 1994.

TABLE 4-15: 2020 PM PEAK CONDITIONS

INTERSECTION NAME		NULL		PREF. ALT. 2.1B		COMPARISON	
		V/C RATIO	LEVEL OF SERVICE	V/C RATIO	LEVEL OF SERVICE	CHANGE IN V/C	EXCEEDS CRITERIA?
Segment A							
15th St	Santa Fe Av	1.38	F	1.39	F	0.01	No
Washington Bl	Santa Fe Av	1.60	F	0.65	B	-0.95	No
25th St	Santa Fe Av	1.30	F	1.77	F	0.47	Yes
Segment B-1							
41st St	Alameda St W	1.85	F	1.57	F	-0.28	No
38th St	Alameda St E	1.20	F	1.16	F	-0.04	No
Vernon Av	Alameda St W	1.31	F	1.08	F	-0.24	No
Vernon Av	Alameda St E	1.15	F	1.11	F	-0.04	No
55th St	Alameda St W	1.44	F	1.31	F	-0.13	No
55th St	Alameda St E	0.87	D	0.77	C	-0.10	No
Slauson Av	Alameda St W	1.56	F	1.45	F	-0.12	No
Slauson Av	Alameda St E	1.02	F	0.91	E	-0.11	No
Segment B-2							
Randolph St	Alameda St W	1.25	F	1.10	F	-0.15	No
Randolph St	Alameda St E	0.63	B	0.53	A	-0.10	No
Gage Av	Alameda St W	1.38	F	1.36	F	-0.02	No
Gage Av	Alameda St E	0.66	B	0.62	B	-0.04	No
Florence Av	Alameda St W	1.35	F	1.33	F	-0.02	No
Florence Av	Alameda St E	0.85	D	0.81	D	-0.04	No
Nadeau St	Alameda St W	2.03	F	2.00	F	-0.03	No
Nadeau St	Alameda St E	1.01	F	0.97	E	-0.04	No
Segment C							
Firestone Bl	Alameda St W	1.91	F	1.81	F	-0.10	No
92nd St	Alameda St W	1.48	F	1.43	F	-0.05	No
Southern Av	Alameda St E	1.36	F	1.21	F	-0.15	No
Tweedy Bl	Alameda St W	1.44	F	1.42	F	-0.02	No
Tweedy Bl	Alameda St E	0.82	D	0.66	B	-0.16	No
ML King Bl	Alameda St W	1.61	F	1.56	F	-0.05	No
ML King Bl	Alameda St E	0.83	D	0.80	D	-0.03	No
Santa Ana Bl N	Alameda St W	1.28	F	1.27	F	-0.01	No
Fernwood Av	Alameda St E	1.44	F	1.29	F	-0.15	No
Imperial Hwy	Alameda St W	1.75	F	1.66	F	-0.09	No
Imperial Hwy	Alameda St E	1.08	F	0.93	E	-0.15	No
Lynwood Rd	Alameda St W	1.24	F	0.92	E	-0.33	No
Lynwood Rd	Alameda St E	0.81	D	0.66	B	-0.15	No
124th St	Alameda St W	1.06	F	0.95	E	-0.11	No
Weber Av	Alameda St E	1.05	F	0.90	E	-0.15	No
El Segundo Bl	Alameda St W	1.47	F	1.42	F	-0.05	No
El Segundo Bl	Alameda St E	1.21	F	1.06	F	-0.15	No
134th St	Alameda St W	1.15	F	1.06	F	-0.09	No
Pine Av	Alameda St E	1.29	F	1.14	F	-0.15	No
Elm St	Alameda St W	1.44	F	1.23	F	-0.21	No
Elm St	Alameda St E	1.93	F	1.68	F	-0.25	No
Palmer St	Alameda St W	1.45	F	0.90	E	-0.56	No
Palmer St	Alameda St E	0.76	C	0.56	A	-0.20	No
Compton Bl	Alameda St W	1.59	F	1.42	F	-0.17	No
Compton Bl	Alameda St E	1.46	F	1.31	F	-0.15	No
Laurel Street	Alameda St W	1.19	F	1.01	F	-0.18	No
Laurel Street	Alameda St E	0.40	A	0.40	A	0.00	No
Alondra Bl	Alameda St W	1.72	F	1.55	F	-0.17	No
Alondra Bl	Alameda St E	1.21	F	0.99	E	-0.22	No
Greenleaf Bl	Alameda St W	1.56	F	1.60	F	0.04	Yes
Greenleaf Bl	Alameda St E	0.96	E	0.80	D	-0.17	No
S Auto Dr	Alameda St W	0.99	E	0.73	C	-0.27	No
S Auto Dr	Alameda St E	0.44	A	0.14	A	-0.30	No

Source: Katz, Okitzu Associates, 1994.

The project would not involve the elimination of any crossings that would in turn increase traffic on other local roads in residential areas or otherwise increase the potential for pedestrian/vehicle conflicts. In addition, by constructing the trainway in a trench, potential conflicts between pedestrians and trains would be eliminated.

No parking would be removed or added as a result of the proposed project.

The proposed project would not involve any permanent modifications to local bus routes, relocations of bus stops or other effects on local transit systems.

Mitigation for Operational Impacts

At 25th Street and Santa Fe Avenue, adding a lane for eastbound right turn traffic, in addition to the planned left turn and through lanes, will improve the V/C ratio to 1.31, which is very close to the No Build condition and will satisfactorily mitigate the project's impacts.

At Greenleaf Boulevard and Alameda Street, adding a westbound right turn lane will result in a 2020 V/C ratio of 1.55, which is better than the No Build condition. This involves changing the project plans for westbound Greenleaf Boulevard from a configuration with a left turn lane, a though lane and a through-and-right lane to a left turn lane, two through lanes and a right turn lane. The bridge that is planned to span the corridor trench would need to be widened to accommodate these lanes.

4.7.9.3 Construction

Impacts

Construction of the locally preferred alternative would affect the circulation of traffic within the study area, although with thoughtful planning, the adverse effects can be reduced substantially. Traffic parallel and perpendicular to the corridor would be impeded as a result of the loss of lanes and possible road closures during construction. Detours would be required to direct traffic around road closures, thus sending more traffic onto other streets. Although temporary road closures during construction would have the most impact on traffic, partial blockage of roadways would constrict traffic and cause congestion. Construction vehicles entering and leaving the work areas would contribute to traffic volumes. However, some traffic would be diverted to other streets due to the construction work. On-street parking would need to be temporarily prohibited on selected streets to increase the vehicle capacity on the detour routes. Access to businesses and homes adjacent to the construction area would be impaired by road closures, blockage of driveways and traffic congestion.

Mitigation Measures

Construction management plans will be developed to identify ways to minimize traffic disruption during construction. Measures will be taken to maintain access to driveways for residences and businesses during construction, to the extent practicable. The possibility of building the at-grade bridges first and then excavating the trench is under consideration and will be implemented if practicable.

4.7.10 Public Services

Please refer to Section 5.5 of the EIR for a detailed analysis of public services.

4.7.10.1 Construction Impacts

Impacts on public services during the construction period would include traffic obstructions and detours affecting police, fire and paramedic vehicles, as well as reduced access to and potential disruption of community facilities. Although typically construction impacts are temporary, when construction periods become protracted, the associated impacts can be substantial. The construction period for the proposed project is estimated to be three to four years at a given location.

General increases in traffic and street closures resulting from construction activities could result in longer police, fire and paramedic response times. Fire and paramedic response time could be delayed if the emergency response teams do not have access to the nearest major cross street or Alameda. Fire protection service would be further impeded in instances where direct access to buildings is obstructed by construction activities or where the buildings are located on streets being closed by the project.

Access to some facilities could be impaired during the construction period. Temporary street closures, temporary elimination of on-street parking and generally increased traffic congestion would impair auto access to some schools, churches and parks. Temporary closure of crosswalks or sidewalks could impair pedestrian access to some service facilities. Relocation of utility lines may further disrupt the operation of these facilities.

4.7.10.2 Operational Impacts

Fire, Police and Other Emergency Services

(For more detailed discussion of public services, see Section 5.5 of the EIR; for further discussion of the risks of derailment and spills, please see Section 4.7.11, Safety and Security, below.)

Because the proposed project would provide at-grade crossings over the depressed trainway (eliminating most east-west cross corridor auto/train conflicts except along the drill track), it would improve vehicular access to public service facilities. This would also improve access for those public services that depend on vehicular access, such as police, fire and emergency vehicles. Under the No Build alternative, increasing train and traffic volumes would render at-grade crossing extremely difficult, and thus result in substantial delays in emergency vehicle response time.

Law officers noted two primary difficulties associated with the Alameda Corridor project. First, it would be more difficult to pursue persons committing crimes who were escaping into the depressed trainway. Second, the potential could exist for stolen property such as automobiles to either be taken into the depressed trainway and stripped or simply driven or dropped into the trainway.

Concerns regarding the depressed trainway configuration have also been voiced by emergency response and fire departments. Problems have been envisioned that may require specialized treatment. For example, although the trench would provide at least partial containment of materials during an incident such as a derailment, it would also make it more difficult to evacuate personnel caught in the trench at the time. This problem could be exacerbated by providing only a limited number of locations where access into the trench would be available. Current project designs provide access into the trench at the northern and southern ends, and via a railroad access road between Alondra Boulevard and Myrhh Street. As a result, fire fighting and evacuation efforts would require operations both from the surface down into the trench and also from below, using the access points that have been provided.

Schools

By the year 2020, the No Build alternative would leave schools along the corridor with congested traffic conditions. Alameda roadway improvements and at-grade overcrossings associated with the locally preferred alternative would improve access to project area schools, as well as critical student access across track areas.

A greater number of trains would use the Alameda Corridor if the proposed project is implemented, as compared to the No Build alternative. As a result, the project, without mitigation, would result in noise impacts at the Exceptional Adult Education Center on El Segundo Boulevard in Compton. These effects are identical to those of Alternative 2.1A. The locally preferred alternative would not require acquisition of school property. See Section 4.7.3 for further discussion of noise impacts and mitigation.

Under the No Build alternative, safety of school students crossing the corridor would be seriously endangered by the increased train and traffic volumes that would co-exist at grade level. The proposed project would create a corridor that would accommodate the increased freight train activities, and at the same time provide for greater safety of students walking across Alameda.

Given the large number of trains that would be traversing the corridor every day in the future, there exists the potential for incidents such as a material spill or train derailment. Should such an incident occur, safety of students at schools fronting Alameda such as Jordan High School or Ritter Elementary School could be adversely affected. With the proposed depressed trainway alternative, these potential risks on student safety could be reduced as damages would be better contained within the trench.

Libraries, Churches, Hospitals and Parks

Implementation of the locally preferred alternative would not result in acquisition of any libraries, churches, hospitals or parks. Alameda roadway improvements and at-grade overcrossings would improve access to project area libraries, churches, hospitals and parks.

The proposed project would not result in adverse noise impacts on libraries, hospitals or parks, but without mitigation would adversely affect the Church of God of Prophecy (see Section 4.7.3 above). See Section 4.7.3.4 for a discussion of potential mitigation measures for these impacts.

Parks and recreation centers fronting the proposed corridor such as the Fred Roberts and Slauson Recreation Centers, Compton Neighborhood Center and Wilson Park are not expected to be subjected to increased air pollutants. For more detailed discussions on these impacts, please refer to Section 4.2, above.

4.7.10.3 Mitigation Measures for Construction Impacts

A community information program will be implemented that will provide advance notice of the location, expected duration and nature of construction activities that would be taking place.

Efforts will be made to minimize the delays in emergency response time during the construction period. Police and fire personnel will be informed in advance of the location and duration of construction activities as well as any temporary street closures. An overall construction sequencing and traffic management plan will be prepared and reviewed with fire and law enforcement officials. Cross streets scheduled for grade separation within a particular jurisdiction will be constructed in a sequence to ensure that traffic impacts are minimized.

Fire and emergency access to buildings adjacent to construction activities will be maintained at all times. Streets undergoing construction will have the curb lane kept open for fire and emergency purposes. Fire hydrants in construction areas will remain accessible.

Impacts on vehicular access to community facilities will be lessened with proper installation of street signs indicating alternate routes to the facility. A complete inventory of the community facilities that exist along the proposed corridor, including map locations, can be found in Section 5.5 of the EIR. Pedestrian access to and from the facility will be improved where necessary with construction of temporary walkways and protective fences. Construction sites which are located near a park or school will be securely fenced and shielded to protect patrons and students from debris, falling objects and construction equipment. School crossing guards will be provided where necessary to ensure students' safety.

Construction noise will be controlled by adherence to local ordinances and by appropriate scheduling of construction activities. Temporary noise barriers may be required in some instances. (See also the noise section, 4.7.3 of this EIS, for additional mitigation measures.)

Should temporary interruption of utilities be required, officials in the affected community facilities will be given advance notice of the time and duration of the shutoff.

4.7.10.4 Mitigation Measures for Operational Impacts

Law Enforcement

Surveillance of the corridor will be provided at as high a level as practicable. This will include area flood lighting that can be activated by corridor or law enforcement personnel, and possibly video cameras with recording capability at selected locations. Also an important element of corridor surveillance would be a continuous open line of communications between personnel working in the corridor and law enforcement officials.

Fire Services

Access roads to the trench will be able to accommodate emergency fire equipment and will be wide enough to provide for the effective use of emergency equipment and vehicles.

Fire departments along the corridor have also recommended that access to water be provided in the trench. The specific approach to providing access to water will be decided during subsequent project design activities with consultation from affected fire departments. Fire protection within the trench will consist of a set of hydrants and a pipeline system (wet or dry). The local hydrant system along the surface streets will also be available.

Schools and Churches

Potential mitigation for the anticipated noise impact at the Exceptional Adult Education Center and the Church of God of Prophecy is discussed in Section 4.7.3, above.

4.7.11 Safety and Security

4.7.11.1 Construction Impacts

The potential for public safety impacts during construction is of concern due to the proximity of people to the construction sites. Children are of special concern and therefore areas in the immediate vicinity of schools must be considered areas of special sensitivity. See Section 5.5 of the EIR for a detailed listing of schools adjacent to the corridor and additional discussion of safety and security.

There are also additional safety issues associated with detouring traffic and negotiating vehicles through construction areas that potentially could arise.

Although unlikely, construction activities could produce accidents involving pipelines and utility lines which could release hazardous materials. Construction activities may also expose contaminated soil and groundwater. The risk of exposure to hazardous materials from contaminated soil or groundwater is discussed in Sections 4.4 and 4.5, above. See Section 5.6 of the EIR for further discussion of safety and security issues.

Mitigation Measures for Construction Impacts

Standard construction safety practices will be employed to protect the public from harm during the construction process. It may be necessary to construct temporary trackage within the corridor while portions of the permanent trainway are being completed or it may be prudent to route train traffic to a parallel facility (such as the SP Wilmington Branch) while the corridor is being built. In either event, close coordination and planning would be maintained with the railroads, the California Public Utilities Commission, local jurisdictions, and special service agencies (fire and police). All reasonable and prudent efforts will be made to protect the public during the construction process.

4.7.11.2 Operational Impacts

The proposed project would consolidate all train movement to and from the Ports onto the Alameda Corridor tracks, thus increasing the amount of trains using the corridor (the total number of trains going to and from the Ports, however, would remain the same). The proposed project includes five major infrastructure improvements that would greatly reduce the likelihood of train accidents:

1) the grade-separated depressed railway would eliminate crossing accidents in the segment from the SPTC J Yard to the SR-91 (Artesia) Freeway;
2) the installation of an integrated series of safety detectors (e.g., hot bearing, shifted load, and dragging equipment detectors) would reduce the probability of an accident caused by mechanical defect and reduce the impact of a single-wheel derailment;
3) right-of-way fencing and focused security protection would reduce the probability of accidents or releases caused by trespassers or vandals (e.g., tampering with switches and signals, placing obstructions on the track);
4) an improved track structure would reduce the probability of derailments; and
5) complete signalization under centralized control of a corridor dispatcher would protect against potential accidents caused by broken rails, misaligned switches, and other train movements.

A major issue of concern to the public is the potential for train derailments and spills. The risk of upset involving hazardous materials is especially important. Please see Section 4.5.1.2 for a discussion of impacts related to accidents involving hazardous materials.

Overall, as compared to the No Build alternative, the proposed project would reduce the potential for substantial impacts related to train accidents. Nevertheless, mitigation measures to effectively manage potential safety/security problems associated with the corridor will be implemented as described below.

Mitigation Measures for Operational Impacts

The project will implement a variety of mitigation measures to reduce the potential for safety and security impacts. The project will conform with all applicable federal and state laws and regulations. These laws are intended to ensure rail safety and cover such subjects as: operation and maintenance of trains, tracks, and equipment; transportation of hazardous materials by rail; and emergency response and notification plans. In addition to federal and state rules, the railroad carriers have their own safety procedures, including: employee training, documentation and identification of materials, special train operating procedures, implementation of regulations, and incident response plans. See Section 5.6.4 of the EIR for a detailed discussion of these procedures.

Federal and state regulations, coupled with railroad carrier procedures, substantially reduce the likelihood of rail accidents, however the risk of an accident within the corridor cannot be eliminated. In order to ensure the safety of the public health and environment in the event of an accident within the corridor, an emergency response plan will be developed by ACTA in conjunction with all potentially involved agencies including, but not limited to: US EPA, Coast

Guard, US Fish and Wildlife Service, California Office of Emergency Services, California EPA, Los Angeles County, Regional Water Quality Control Board, California Department of Fish and Game, California Highway Patrol, railroad carriers and all fire and police departments serving the corridor.

The goal of the emergency response plan will be to provide a prompt and thorough response to any type of emergency situation that may develop within the corridor. The plan will incorporate the following elements:

1) Emergency Response Data: This will consist of maps and text consolidating information that would be of immediate need in the event of an emergency. The information in the data will include:

- Locations and contact numbers for all parties potentially involved with emergency response within the corridor (e.g., fire departments, hazardous material teams, police departments, railroad carriers, etc.).
- Locations of all sensitive populations in the immediate vicinity of the corridor (e.g., schools, hospitals, convalescent homes, childcare facilities, etc.).
- Locations of environmentally sensitive areas that could potentially be affected by an accident in the corridor including the Dominguez Channel, Los Angeles River, Compton Creek, and drain structures that lead to any sensitive area.
- Availability and locations of emergency response equipment including fire fighting apparatus, hazardous material equipment, containment booms, and other specialty equipment.
- Corridor access information for the depressed trainway that includes locations of access points for both personnel and large equipment.

2) Specific Scenario Plans: These plans will be geared toward a worst-case accident and will include a prescribed sequence of events for each scenario. The chain of events will cover three general levels of response: a) A primary response which would relieve the immediate hazard to health (e.g., stabilize hazardous materials, contain spills, etc.); b) A secondary response which would remediate environmental damage and restore service within the corridor; and 3) A tertiary response which would involve an investigation of the accident and a review of the effectiveness of the emergency response. The worst case scenarios developed will include:

- Hazardous Materials Release: Types of chemicals commonly in transit along the corridor would be identified and specific guidelines for dealing with them would be drafted. Hazardous materials teams that could be called to respond would be identified along with a means of contact;
- Sensitive Populations: Procedures for evacuating sensitive populations would be developed for each sensitive land use located in the vicinity of the corridor;
- Environmentally Sensitive Areas: Procedures for dealing with contamination of waterways would be developed, including the location of containment and clean-up equipment and what agencies would carry out remedial actions;
- Multiple Events: Procedures for obtaining expanded emergency assistance would be established in the event that local resources are overwhelmed by multiple incidents.

The emergency response plan will be reviewed and updated annually to reflect any changes in the emergency response data set, or in the nature of potential hazards. Once completed, the plan would be sent to all involved agencies for review and comment.

4.7.12 Aesthetics

4.7.12.1 Operational Impacts

Section 5.7 of the EIR provides a detailed discussion of the potential visual impacts that may be associated with railroad and roadway structures that would be constructed as part of the proposed project. The expected effects would include the introduction a new visual element which may be intrusive; inconsistencies with existing visual character or which reduce the quality of important views or scenic resources; and the potential removal of visual buffers or important visual elements.

The locally preferred alternative, Alternative 2.1B, would not introduce major new visual elements that would be inconsistent with surrounding uses or remove important visual buffers or elements. Under Alternative 2.1B, reconstruction of Alameda Street in its present configuration would not require street widening or associated removal of landscaping, result in increased traffic on streets in residential areas, or decrease the distance between the transportation corridor and surrounding land uses. The locally preferred alternative would not involve the construction of new above-grade overpasses between 25th Street and SR 91; at-grade bridge crossings are not expected to produce substantial changes in the visual environment. The proposed alternative would construct above-grade railroad facilities including new railroad bridges over Grande Vista Avenue and Washington Boulevard and an AmTrack overcrossing in the north end of the project. In the south end, the project would enlarge one railroad bridge and construct two new railroad bridges over the Dominguez Channel and construct a new railroad bridge over Alameda Street. In addition, soundwalls are proposed to mitigate noise impacts at three locations along the corridor, as described in Section 4.7.3, above. See Figure 2-8 in Chapter 2, above, for the locations of these new elements. Because these new railroad elements would be consistent with surrounding uses, which are predominantly industrial and/or railroad related, and would not obstruct locally important views, they would not result in adverse visual impacts. The locally preferred alternative involves the acquisition of a number of parcels with existing structures. These structures may or may not be demolished at each of the acquired sites. Because these parcels do not contain structures with particular visual significance or serve as a visual buffer, their removal, if necessary, would not result in substantial visual impacts.

For the reasons described above, the locally preferred alternative would not result in substantial visual impacts. In addition, placing the trainway in a trench would reduce the visibility of the railroad, and to the extent that the existing at-grade railroad is seen as an inconsistent visual element in residential areas, this change may be considered a positive visual effect.

The depressed trainway would pass through the Central Business District of the City of Compton, which is a situation unique to that jurisdiction. Representatives of Compton have expressed concern with regard to the visual effects that may be perceived as creating a barrier between opposite sides of the CBD. In this area, the proposed project would consist of a depressed trainway (approximately 50 feet in width), with four at-grade traffic lanes to the immediate west and two at-grade traffic lanes to the east. Running along the length of the trainway would be a

safety fence, constructed of a short (approximately 3 feet in height) concrete barrier and a continuous fence, extending to a total height of 8-10 feet. Some persons may perceive this configuration as a visual barrier in the CBD. This was not regarded as a significant adverse effect in the previously completed CEQA process and it is not so regarded in the current NEPA process.

With the No Build alternative, the railroad would remain at-grade and the number of trains using the railroad would increase. This would exacerbate current adverse visual impacts associated with inconsistencies of the railroad with nearby residences.

4.7.12.2 Construction Impacts

During construction activity, the construction sites and materials storage areas would temporarily create a disorderly appearance. In addition, construction activity that may occur at night would produce light and glare which would be intrusive to some uses. It is assumed that the light and glare impacts would extend to sensitive uses located within 46 meters (150 feet) of the improvement.

4.7.12.3 Mitigation Measures

- Construction activities will be conducted during daytime hours whenever practicable.
- Residential areas will be shielded from construction lighting.
- Soundwalls will be designed to be graffiti-resistant either with landscaping or by other means.

In response to perceived visual effects in the Compton CBD, and in recognition of the need to apply urban design principles to the Corridor as a whole, the following mitigation measures have been agreed to:

- A master plan for landscaping and urban design will be prepared for the entire 20-mile corridor.
- A series of cut-and-cover sections and wider bridges will be built at key intersections (Compton Boulevard, Myrhh Street, Palmer Street, Greenleaf Boulevard, Alondra Boulevard) over the lowered railway in Compton. These widened bridges will be developed into pedestrian plazas with appropriate amenities.
- Within the City of Compton, graded slopes adjacent to the rail trench will be used to the extent possible to reduce the effective height of the top of the fence, and thereby maximize line of sight across the rail trench.

4.7.13 Economics

4.7.13.1 Business Disruption During Construction

Construction activity along the Alameda Corridor may produce a substantial adverse effect upon businesses located along the corridor. Disruption would occur when street access is restricted during construction and businesses would also experience noise and dust from construction activity. Businesses would lose on-street parking and perhaps some off-street parking as a result of nearby construction. For some businesses, especially small retail operations, prolonged construction could substantially affect their operation and viability.

Construction activity could affect any one block for up to three years. The actual loss of access and street parking availability would depend upon the sequence of construction. Full and partial street closings may be required at times throughout the construction period and may create noisy conditions.

The precise effects on businesses located along the corridor would depend upon site-specific conditions and the strength of the business at the outset of construction. Larger businesses should have less difficulty than smaller ones. Businesses having a loyal client base (such as those that provide unique goods or services) would have less difficulty than those which depend upon trade from the general public. Businesses of an industrial nature and wholesale business would have less difficulty than commercial, office and retail businesses. Overall, the project construction period would produce business disruptions and inconveniences that can be overcome in the majority of instances but may be insurmountable for some.

Construction-related business disruption would not occur with the No Build alternative.

To mitigate construction-related business disruption impacts, appropriate signage will be used to direct patrons to alternate routes to businesses. Traffic management plans will be implemented to maintain access to businesses. A business outreach program will be implemented to inform local merchants of construction schedules which may affect their establishments. A project office hot-line will also be developed as a mechanism to answer questions related to the project.

See section 5.9 of the EIR for further discussion of effects on business activity during construction.

Economic Benefits

Construction employment has both direct and indirect beneficial consequences. The direct effect is the number of construction jobs created to complete the project. The locally preferred alternative would generate on the order of 10,000 person-years of construction employment over a ten year period. Construction employment was calculated based upon a factor of 11 jobs created per one million dollars spent on construction (U.S. Bureau of Labor Statistics, 1991 Abstract) and estimated total construction expenditures for the ten year period of about $820.5 million.

The indirect benefits are additional employment and business activity for the regional economy generated by the initial construction expenditure. These indirect effects can be quantified using a multiplier. The multiplier for regional output used by Southern California Association of Governments (SCAG) in its 1991 66-sector Input/Output (I/O) Model is 1.74; that is, for every dollar of construction spending in the regional economy, $1.74 dollars would result in the form of overall employment, income and output. Alternative 2.1B would generate up to approximately $1.4 billion in secondary economic benefits, by applying this multiplier, thus resulting in a combined direct and secondary benefit of over $2.2 billion.

4.7.13.2 Operational Impacts

Business Access

The Alameda Corridor project generally would improve traffic flows across Alameda Street, thereby enhancing access to businesses located adjacent to the corridor. The proposed grade separations would greatly improve access to businesses which under the No Build alternative would be seriously impaired by increased train traffic in the year 2020.

Street access to all businesses not acquired by the Alameda Corridor project would be maintained.

Relocation of Acquired Businesses

As described in Section 4.7.8 above, the locally preferred alternative would require acquisition of 29 improved commercial and industrial properties adjacent to the corridor. These acquisitions would require appropriate relocation and compensation as described in Section 4.7.8.

Two types of business operations that exist within the corridor have been identified as potentially difficult to relocate: 1) small-scale industrial businesses that have been in operation prior to enactment of Southern California Air Quality Management District (AQMD) standards (which would be required to meet increasingly stringent AQMD rules in order to be permitted to relocate); and 2) small-scale businesses, such as fast-food restaurants, repair shops and scrap metal yards, which would encounter substantial relocation costs such that their ongoing financial stability would be questionable.

Displaced firms which are currently out of compliance with AQMD standards could incur very high costs, forcing them to relocate out of Southern California or to cease operation. It is unknown how many industrial businesses in the corridor are currently in non-compliance with AQMD codes. This effect could be substantial, but cannot be quantified. Similarly, the number of businesses not able to financially withstand a project-imposed relocation also cannot be quantified.

San Pedro Bay Ports Plans

The Alameda Corridor would provide economic benefits by supporting the San Pedro Bay Ports plans, which propose to expand land and terminal facilities at the Port of Los Angeles and the Port of Long Beach, to the extent that the corridor would provide an efficient means of successfully accommodating the realization of the ports expansion plans. These expansions

would add construction and port-related jobs in the Southern California, five-county region in the future, and would also generate sales revenue and state and local taxes in Southern California.

Revenue Loss due to Acquisition

Most business acquisitions resulting from the proposed project would occur in the City of Los Angeles and unincorporated communities of Los Angeles County.

- Property Taxes

Property taxes are levied on the assessed value of privately owned property. Los Angeles County collects property taxes for properties within the County limits and disburses the revenue to individual jurisdictions based on a percentage of the total property taxes collected in those jurisdictions. When properties are obtained for rights-of-way, the property tax base is reduced. Only parcels which would be taken in their entirety by the project are included in the calculation of property tax losses. Property taxes collected in 1993 on commercial properties were calculated using 1993 Los Angeles County Assessor rolls and are shown in Table 4-16.

TABLE 4-16
ANNUAL PROPERTY TAX LOSSES

JURISDICTION	TOTAL PROPERTY TAXES LOST	PROPERTY TAX RATIOS (%)[1]	ALTERNATIVE 2.1B
			PROP. TAX LOSSES TO JURISDICTIONS ($)
COMPTON	$4,405	14%	$617
LOS ANGELES	$338,039	33%	$111,553
VERNON	$2,875	8%	$230
CORRIDOR	$345,319	–	$112,400

Note: [1] Tax ratios are from the Los Angeles County Auditor Controller, Tax Division, 1992. These ratios represent the average rate at which jurisdictions are reimbursed by the County for property taxes collected within their boundaries.

Source: Myra L. Frank & Assoc., Inc, 1992.

Property tax losses may also include special assessment district taxes. Property tax losses to individual jurisdictions would be a small portion of each jurisdictions' annual property tax revenue. The anticipated losses in property taxes are not judged to be substantial.

- Sales Taxes

Sales taxes are collected by the State of California at 7 percent of the total sales receipts. Out of this amount 6 percent goes to the State of California, and one percent is redistributed to the city where the business is located. In Los Angeles County, an additional one percent is levied as result of Propositions A and C, and 0.25 percent for local transit projects, making the current total sales tax rate 8.25 percent.

Acquisitions would lower the number of sales tax-generating businesses in cases where the business could not relocate. The cities along the corridor, Los Angeles County and the State of California could lose sales tax revenue. Sales tax revenue is difficult to predict, and therefore, not calculated in this report. The number of business acquisitions for each city are sufficiently small that the loss of sales tax revenue is not considered substantial.

- Business License Fees

Business license fees represent a relatively small share of total city revenues. The commercial properties acquired by the Alameda Corridor project, in turn, represent only a small fraction of all businesses in each jurisdiction. Business license fees are generally assessed by the jurisdictions based upon one of two factors: number of employees or annual gross sales receipts. The loss of business license fees to local jurisdictions is not considered substantial.

Economic Benefits of the Corridor

With regard to the loss of property tax, business license and sales revenue to local jurisdictions, the aggregate benefits of construction employment and related expenditures, attractiveness of the new corridor and its efficiency benefits to anticipated growth of port, rail, truck, import and export-related businesses in the corridor area are expected to far outweigh these expected losses.

Expansion and reconfiguration of the corridor would generate long-term economic benefits by accommodating industrial, warehousing or transportation-related business activities in the area. The proposed project would create a linear transportation corridor that would result in improved traffic flow for both trains and motor vehicles. It is likely that the corridor would become a focal point for businesses that would directly and indirectly serve the goods movement industry. This would result in a beneficial effect on the local and regional economies.

4.8 SECONDARY AND CUMULATIVE EFFECTS

The proposed project could result in secondary effects that could occur as a result of reasonably foreseeable actions that may occur later in time or be removed from the immediate project under consideration. The project may also result in cumulative effects when its effects are added to those of other past or reasonably foreseeable future actions. This section discusses these effects.

In terms of secondary effects, the following discussion is largely based on the belief that there would be future efforts to consolidate additional freight rail activities or lines, such efforts stemming from the benefits to be realized from the proposed project. With regard to cumulative effects, the proposed project is viewed in the context of such other activities as expansion of economic activity at the ports, in conjunction with Ports Access Demonstration Projects and other local projects, and in terms of regional freight rail operations.

The Ports Access Demonstration Projects are individually limited in scope and geography. Most of the improvements being undertaken by these projects would produce relatively minor effects. When taken as a collective group, they would not produce substantial cumulative effects, nor would substantial cumulative effects occur in combination with the proposed Alameda Corridor improvements.

4.8.1 TOPOGRAPHY, GEOLOGY AND SOILS

The proposed project would not produce conditions affecting topography, geology or soils which would be expected to result in secondary or cumulative effects. The effects associated with the proposed project would be confined to the project's immediate surroundings and time frame.

4.8.2 HYDROLOGY AND WATER QUALITY

The proposed project would not produce conditions affecting hydrology or water quality which would reasonably be expected to result in secondary or cumulative effects. The effects associated with the proposed project would be confined to the project's immediate surroundings and time frame. The proposed project would not add materially to the effects on water quality occurring as a result of constructing landside terminals in the ports, nor would it contribute materially to runoff conditions.

4.8.3 AIR QUALITY AND ENERGY

The proposed project would have the direct result of improving local and regional air quality, by reducing locomotive emissions and by greatly reducing vehicular idling emissions at grade crossings, and reducing diesel locomotive fuel consumption. To the extent that additional freight rail consolidation may occur, or if freight rail electrification were to become a reality in the future, additional indirect or secondary air quality and energy benefits would be realized. When added to the beneficial consequences of creating on-dock and near-dock rail yards, and the additional grade separations and other transportation improvements that would be provided by the Ports Access Demonstration projects, the proposed project is judged to result in beneficial cumulative air quality and energy effects.

4.8.4 NOISE AND VIBRATION

The proposed project would remove freight rail traffic from a number of rail lines in the region. This would have the result of reducing the number of people exposed to railroad noise and vibration along those lines by 90 percent. If the proposed project were to encourage future consolidation, thus reducing railroad traffic on other lines, additional reductions in exposure to noise and vibration may occur as an indirect result of the project. The expansion of ports activity could have the effect of partially offsetting these gains by creating additional terminals and ground transportation activity that would increase noise, but this effect would be generally confined to the immediate port vicinity, wherein land uses are typically industrial in nature.

4.8.5 VEGETATION AND WILDLIFE

The proposed project would not produce conditions affecting vegetation and wildlife which would reasonably be expected to result in secondary or cumulative effects. The project would have an effect on one small area of wetland (Compton Creek), but it would not produce conditions that would cumulatively result in losses of wetlands or habitat areas, since the project is located in a highly urbanized area. The project is not expected to materially contribute to effects on marine habitat that may occur as a result of port expansion.

4.8.6 LAND USE

Land uses adjacent to portions of existing rail lines in Southern California are industrial in nature. There are other portions of these lines, however, that have substantial areas of residential or other sensitive uses. Once the Alameda Corridor becomes operational, it would have two possible secondary land use effects. First, the Alameda Corridor would focus future changes in its adjacent land uses to increasingly industrial or transportation-related uses. Second, for those rail lines on which freight traffic would be reduced or eliminated, the surrounding areas may become more amenable to land uses changes away from industrial and toward residential, depending upon local policies. The secondary and cumulative effects on land uses resulting from this trend would be beneficial.

The proposed project would contribute to the viability of expanded on-dock and near-dock rail yards at the ports, which in turn would contribute to continued economic activity at the ports. This could result in expanded industrial land use in the immediate vicinity of the ports. The proposed project would contribute to this series of potential occurrences in a cumulative sense.

4.8.7 POPULATION AND HOUSING

The proposed project would not produce conditions affecting population and housing which would reasonably be expected to result in secondary or cumulative effects. The project is not anticipated to require acquisition of residential units. On the contrary, the proposed project should improve noise and traffic conditions in the vicinity of residential areas along the corridor and therefore would have a beneficial effect with regard to population and housing.

4.8.8 ACQUISITION AND DISPLACEMENT

The proposed project would not produce conditions affecting acquisition and displacement which would reasonably be expected to result in secondary or cumulative effects. Acquisitions for the proposed project would be confined to commercial and industrial properties located in the immediate vicinity of the corridor and there would not be changes occurring along the corridor produced by the project that would result in subsequent acquisitions or displacements. The proposed project would not contribute in a material way to acquisitions or displacements associated with ports expansion, other ports access projects, or local projects.

4.8.9 TRANSPORTATION AND CIRCULATION

The proposed project would consolidate a portion of freight rail service in Southern California. The immediate benefits of this would include reducing locomotive hours of operation in the region by 30 percent, reducing stoppages between trains by 75 percent, reducing traffic delays at grade crossings by 90 percent, and effectively eliminating conflicts between trains and vehicles. This could have the secondary effect of encouraging expansion of the freight rail consolidation concept to other portions of Southern California. This has already been suggested by some planning agencies in the context of improving air quality.

The proposed project would have the direct effect of removing substantial freight rail traffic from other lines serving the ports, which would then translate into improved conditions for residents along those other lines. In particular, the SP Wilmington, La Habra and Santa Ana Branches, UP San Pedro Branch, and ATSF Harbor Subdivision would be so benefitted. Once these lines have been freed of freight rail traffic, there could be indirect effects related to the future use of these rail lines. For example, local jurisdictions may be desirous of maintaining low levels of freight traffic on these lines and perhaps even seek to have them abandoned. Also, the former rail lines not being required for freight traffic, could become available for passenger use. An agreement has already been entered into between the ATSF and the Los Angeles County Metropolitan Transportation Authority (LACMTA) for the purchase of the Harbor Subdivision, at such time as the Alameda Corridor becomes a reality. Given local efforts to create an expanded passenger network, the proposed project could have the indirect effect of contributing to the region's passenger rail system.

The proposed project would have a cumulatively beneficial effect with regard to future transportation and circulation associated with expanded activity at the ports. The project would contribute to the viability of on-dock rail yards which are expected to result in a reduction of truck movements in the region by a factor of 23 percent. With the Alameda Corridor in place, ground based goods movement activity (by trains and trucks) associated with the ports would be improved, in the immediate vicinity of the ports, along the Alameda Corridor and its adjacent cities, and throughout Southern California as a whole. Goods movement in general in the region would be more efficient cumulatively as a result of the proposed project.

4.8.10 PUBLIC SERVICES

The proposed project would not produce conditions affecting public services which would reasonably be expected to result in secondary or cumulative effects. The effects of the proposed project would be confined to its immediate vicinity and the project would not contribute in a material sense to effects on public services that may occur in the vicinity of the ports.

4.8.11 SAFETY AND SECURITY

The proposed project would provide for the movement of goods along a consolidated corridor that would be subject to greatly improved surveillance and emergency response potential. This would have the direct result of improving freight-related safety along the Alameda Corridor and along the other rail lines which will experience reduced train volumes. Accidents involving railroads (sometimes resulting in spills of toxic or hazardous materials) and between trains and automobiles and trucks should be greatly reduced as a result of the Alameda Corridor. Also, it is intended that a comprehensive emergency response plan will be developed for the Alameda Corridor. One indirect result of this may be that new or improved emergency response procedures may become known that then could be adopted by local jurisdictions or emergency providers throughout Southern California and perhaps elsewhere.

4.8.12 AESTHETICS

The proposed project would not produce conditions affecting aesthetics which would reasonably be expected to result in secondary or cumulative effects. The project would not contribute to changes in the visual environment occurring in the ports or elsewhere in areas influenced by rail transportation.

4.8.13 CULTURAL RESOURCES

The proposed project would not produce conditions affecting cultural resources which would reasonably be expected to result in secondary or cumulative effects. One related resource, the Badger Avenue Bridge, is being replaced by the Port of Los Angeles as part of a separate undertaking. This action has been contemplated for some time and was taken independent of the planning for the Alameda Corridor. The proposed project would not contribute materially to other actions being taken by the ports for improvements within their jurisdiction, by various agencies in the implementation of various ports access projects, or by local agencies for projects within their jurisdiction. The proposed project involves physical improvements that are confined to the project's immediate vicinity and it is not anticipated that subsequent actions affecting cultural resources in nearby areas would result from the proposed project. No adverse effects upon cultural resources are anticipated from this project, barring the discovery of significant buried cultural resources during construction.

4.8.14 ECONOMICS

The proposed project would have the direct benefit of creating an estimated 10,000 construction jobs. By contributing to expanded economic activity at the ports, cumulative benefits would be realized by the year 2020 that would include an estimated 700,000 local jobs, 2 million jobs nationwide, $69.4 billion in annual output in Southern California, $2.2 billion annually in state and

local taxes, $11.3 billion annually in federal income and business taxes, and $5.2 billion annually in customs receipts.

The proposed project would contribute to the ongoing development of on-dock and near-dock rail yards at the San Pedro Bay Ports. This would in turn contribute to the expected growth in containerized cargo. The indirect result of this would be to contribute to improved efficiency of goods movement, which could then place the ports in a more competitive economic position relative to other ports on the West Coast and Mexico. Improved efficiency of goods movement in the region would also result in benefits to many local businesses. The extent of these benefits have not been estimated.

The effects of the Alameda Corridor, when taken in the context of economic activity at the ports, the Ports Access Demonstration Projects, other projects being implemented by various local jurisdictions in the study area, and in terms of regional freight rail operations, would not affect the overall inventory of cultural resources, wetlands, vegetation and wildlife or other resources in the study area.

4.9 RELATIONSHIP OF SHORT-TERM USES VERSUS LONG-TERM PRODUCTIVITY

Once constructed, the proposed project would result in an improvement in the operating efficiency of the rail system that connects the San Pedro Bay ports with regional rail systems. This would benefit the productivity of local as well as regional business and industrial economies that are dependent on ports-related transportation. These benefits would be realized in the near term and would increase in the future with increased need for rail transport associated with projected increases in activity at the ports. The tradeoff for these productivity benefits would be short-term uses of the environment during the project's construction period, such as traffic flow obstructions in the immediate vicinity of the construction sites, noise impacts on nearby residences and air quality effects associated with the operation of construction equipment and the release of fugitive dust from construction sites. Construction period impacts are temporary and would be far outweighed by the near- and long-term productivity benefits of the project.

The Alameda Corridor, once operational, would result in substantial long-term environmental benefits to the region. Locomotive use would be reduced by 30 percent, railroad emissions would be reduced by 28 percent and stoppages involving two trains would be reduced by 75 percent. Traffic delays at grade crossings would be reduced by 90 percent and population exposure to railroad noise and vibration would be reduced by 90 percent. The Corridor would also greatly reduce the adverse effects of future train movements on schools; safety and security measures could be more effectively managed; and conflicts between trains and motor vehicles could be effectively eliminated.

4.10 IRREVERSIBLE AND IRRETRIEVABLE COMMITMENT OF RESOURCES

Construction of the proposed project would result in the use of nonrenewable resources. Fossil fuels used to power construction equipment, delivery and employee vehicles; and resources such as steel, wood and concrete would be used in the construction of physical facilities. The use of fossil fuels would be considered an irretrievable commitment of resources. To the extent that this project would construct the proposed facilities for long range use, the commitment of

construction materials would be considered irreversible. In addition, the reinforcement of the Alameda Corridor as a transportation right-of-way would continue the commitment of land along the corridor for this use. This commitment is not likely to be reversed in the foreseeable future.

4.11 UNAVOIDABLE ADVERSE EFFECTS

As is shown in Table S-1, there are a number of effects for which the application of mitigation measures would not be sufficient to either completely eliminate the adverse effects or reduce them to below a level considered substantial. These effects are as follows:

Noise: Before mitigation, the proposed project is estimated to result in noise effects exceeding established abatement criteria at up to 92 residences and 2 community facilities. Noise barriers would be installed in the affected locations, which would have the effects of reducing the adverse consequences to approximately 8 residences and the 2 community facilities. Because these effects will remain, they are considered unavoidable and adverse.

Project-related noise impacts exceeding abatement criteria have been estimated at two schools located along the Corridor. These schools are located in such a way that soundwalls cannot be installed. During subsequent final design stages of the project, consideration will be given to using sound insulation in those schools buildings which would experience the increased noise. This approach, if taken, would likely reduce the residual noise to an acceptable level. Since sound insulation has not as yet been explored, at the present time this effect is considered potentially substantial, and if sound insulation is not installed, the effects would not be avoided.

Transportation & Circulation: Construction of the proposed project would result in traffic disruption at various locations throughout the construction period. The potential effects would include temporary inconveniences, delays, detours, reduced on-street parking, and restricted access to homes and businesses. A construction management plan will be developed and implemented to manage the flow of traffic as best as possible during the construction period. Lane closures will be minimized and workable detours and signage will be provided. A public information program will be implemented to disseminate information concerning the progress of construction and advanced notice will be provided of upcoming construction activities. Even with the traffic management program in place, there will remain traffic disturbances that many will find inconvenient. These residual effects are considered unavoidable.

Public Services: There would be the potential for law enforcement officials to find it difficult to pursue persons committing crimes who manage to find a way to enter the depressed trainway, or to retrieve stolen goods that may be abandoned in the depressed trainway. The frequency of these occurrences cannot be known or accurately predicted. For purposes of impact characterization, these effects have been classified as potentially substantial. It may well be the case that the anticipated effects discussed above can be effectively eliminated; however, since it is not possible to assure that this will happen, the effects are considered potentially substantial and unavoidable.

Safety & Security: The movement of hazardous materials by the three railroads through Southern California is determined by the railroads themselves, and the Corridor would have no influence on the nature or magnitude of such movements. However, the project would focus many trains traveling to and from the ports along the Corridor, and since some of these would

be carrying hazardous materials, the likelihood of an accident or spill could be increased within the Corridor, as opposed to other rail lines outside of the Corridor. On the other hand, the use of the Corridor by the three railroads would correspondingly reduce the potential for accidents or spills on those former rail lines which would have carried the Corridor-destined trains. Also, the Corridor will incorporate equipment and operating procedures that would be superior to those which are in place at the present time, thus reducing the likelihood that an accident would occur, and if an accident were to happen, it would be less likely to result in property damage or be a public health risk. It is likely, therefore, that the post-project situation would be considered beneficial. However, since any one accident or spill could have substantial adverse consequences for the surrounding area, this effect is considered potentially adverse and unavoidable.

4.12 ENVIRONMENTALLY SUPERIOR ALTERNATIVE

The concept of freight rail consolidation in southern California has been under investigation since the early 1980s. Since that time, various studies have concluded that this concept has merit, both in terms of operational benefits (i.e. improved efficiency of goods movement both within and through the region) and in terms of environmental effects (i.e. reduced delays at grade crossings; improved regional air quality). The development of the Alameda Corridor project, as documented in the Concept Engineering and environmental efforts, has confirmed these earlier findings, and as a result, it is herein concluded that the concept of freight rail consolidation, as compared with status quo freight rail routing, is considered environmentally superior.

Much of the early analysis of the consolidation concept, continuing through the development of the Alameda Corridor, as a result of seeking the most efficient means of accomplishing this goal, has focused on where a consolidation route should be located. The early SCAG studies (*San Pedro Bay Ports Access Study, 1984*) concluded that of the mainline routes which are available, the Southern Pacific San Pedro Branch offered the best opportunity for consolidation, because it could both enable the required rail movements in an efficient manner, and also because it contained the least population exposure of all alternative corridors that were reasonable alternative choices, thus making it possible to achieve the highest likelihood of reducing overall adverse effects of future regional rail movements (see Table 2-1). This early finding by SCAG was also confirmed by the Concept Engineering studies (see section 2.2), and therefore it is herein concluded that selection of the Alameda Corridor (SP San Pedro Branch) as a regional freight rail consolidation corridor, when viewed in the context of other corridor choices in the region, is considered environmentally superior.

The analysis of specific physical design alternatives for accomplishing rail consolidation within the Alameda Corridor was examined both in the previously completed EIR (see EIS sections 2.3 and 2.4), from which emerged a locally preferred alternative referred to as Alternative 2.1B, and a comparison of all engineering alternatives previously examined has been presented in this EIS (see section 2.5). Of all the alternatives examined, it is concluded that all of the depressed trainway alternatives would have fewer adverse effects than the at grade alternative, and therefore are considered environmentally superior to that option. The at grade alternative would a) require substantially more right-of-way (resulting in more displacement of persons and businesses), b) subject significantly more residences to adverse noise impacts, c) require substantial lengths of sound walls (with attendant opportunity for graffiti and perception as a neighborhood barrier), d) be more visually intrusive, e) require corridor vehicular traffic to use local streets to reach

above grade crossings over the corridor, and f) present greater difficulty in containing spills in the event of a rail accident.

The sloped trench alternative is judged to be environmentally inferior to the straight-walled depressed trainway, because it would require substantially more right-of-way, resulting in more displacement without commensurate additional benefits in other areas.

The Vernon Diversion is judged to be environmentally inferior to the alignments totally within Alameda Street, because it would a) have residual noise and vibration impacts on a number of residences that would not otherwise be affected, b) require the taking of property from a public housing project, c) require the taking of additional residential property, and d) increase noise levels in the vicinity of a school and recreation center that would otherwise not be affected.

The result of the above findings leads to a comparison of Alternative 2.1A and 2.1B, both of which are considered environmentally superior to the above alternatives and both of which would meet the goals of the project.

Alternative 2.1B (depressed trainway with four traffic lanes on Alameda Street) is judged to be environmentally superior to Alternative 2.1A (depressed trainway with six traffic lanes on Alameda Street) because it would a) have beneficial effects at least equivalent to Alternative 2.1A, b) require the least amount of right-of-way of any alternative considered, c) confine required property acquisitions to industrial parcels (thus avoiding the taking of residential property), d) result in the least exposure to adverse noise impacts (requiring the least amount of soundwalls), and e) best accommodate the respective interests of the local jurisdictions located along the corridor.

CHAPTER 5

COMMENTS AND COORDINATION

5.0 COMMENTS AND COORDINATION

5.1 PUBLIC AND AGENCY INVOLVEMENT PRIOR TO THE EIS

An extensive public comment effort was undertaken as part of the CEQA process. In August 1992, the Draft EIR was distributed to an initial mailing list of 120 government agencies and interested parties. Notices announcing the availability of the DEIR were published in a number of local newspapers and copies of the DEIR were placed in seven area public libraries. During the course of the public comment period, requests were filled for an additional 100 copies of the DEIR.

A total of six public hearing sessions were held, which were attended by 163 persons, of whom 47 provided testimony. The public hearings were announced through a variety of means, including newspapers, direct mailing, radio and television public service announcements, flyers and door hangers. In addition to the formal public hearings, four community meetings were held.

A total of 35 letters of comment were received from sources distributed as follows: Federal agencies, none; state agencies, 2; regional agencies, 6; County of Los Angeles departments, 3; local jurisdictions, 8; private companies, 8; individuals, 4.

All comments were responded to in the Final EIR, which was certified by the Alameda Corridor Transportation Authority Governing Board in January 1993.

5.2 EIS SCOPING ACTIVITIES

The present Federal environmental process began with the publishing of a Notice of Intent (NOI) in the Federal Register on December 16, 1993. The NOI indicated that the Federal Highway Administration (FHWA) and Federal Railroad Administration (FRA) were to be joint Federal lead agencies for the preparation of an EIS, it invited comments on the process, and it announced a formal scoping meeting, which was held on January 18, 1994. In addition, public notification of the scoping process was provided through newspaper advertisements in seven local newspapers. Public agencies and known interested parties were notified through a direct mailing. Five Federal agencies were informed through a direct mailing and a general mailing was conducted that included 465 addressees. The scoping period extended from December 18, 1993 until February 4, 1994.

Two sessions of the scoping meeting were held, one afternoon session and one evening session. At each session, attendees were given a packet of information about the project, and a presentation was conducted to explain the project and the purpose of the meeting. Fifty-one persons attended the two scoping sessions combined. Six speakers provided comments and 12 written submissions were received at the scoping sessions. Comments were heard at the scoping sessions from the City of Vernon, the City of Compton (4 speakers) and the City of Downey.

Fourteen written comments were received during the scoping period, distributed as follows:

- U.S. Environmental Protection Agency
- Metropolitan Water District of Southern California
- Los Angeles Unified School District
- City of Compton
- City of Vernon
- ARCO Products Company
- Dunbar Economic Development Corporation
- GATX Tank Storage Corporation
- Barry M. Schram & Associates
- Ventura-Lesbro
- Watson Land Company
- Fred G. Anderson
- William P. Ward
- Jack Engle & Co.

Summaries of comments received during the scoping period are provided in Appendix E of this EIS.

Substantial issues that were raised during the scoping period were as follows:

Alternatives: Parties expressed support for the depressed trainway. The City of Compton suggested that a depressed truckway should be included within its city limits. This potential alternative was considered during the course of preparing the EIS, and it was rejected as an option by the ACTA Governing Board by formal action at its meeting of October 1994. Reasons which were cited included: (1) the truck expressway would not meet the goal of attracting trucks away from parallel freeways, (2) the expressway would have undesirable noise and aesthetic impacts, (3) truck traffic would increase congestion in Vernon and Los Angeles at the northern end of the Corridor and (4) the expressway would be more costly that other alternatives considered. In response to the issues raised by the City of Compton, the ACTA Governing Board adopted the recommendations of the ACTA Technical Working Group, including: (a) reaffirm the project definition as adopted by ACTA on January 13, 1993, (b) explore options for preserving the downtown business district in Compton and (c) work with SCAG on its upcoming truck study to review options for solving truck problems in the area. Opposition to the at-grade and Vernon Diversion alternatives was stated by one jurisdiction.

Accessibility: Parties expressed concern that the project should provide for an appropriate number and location of crossings over the proposed depressed trainway. Emergency access was a related issue raised in this context, as well as a concern for east-west travel delays. Pedestrian crossings were identified as a concern.

Safety: Parties inquired as to the manner in which the Corridor would be protected, primarily from accidents involving people or vehicles falling into the trench. Safety of pedestrians and students was noted by some commenting parties. One party asked for a detailed analysis of public safety issues. One party inquired regarding the potential for liquefaction and soil contamination.

Air Quality: Several parties inquired regarding air quality impacts and the effects of the project in this regard. Some special facilities or receptors were identified.

Noise and Vibration: The potential for noise and vibration impacts was noted.

Traffic and Circulation: Auto and pedestrian circulation issues were raised. Traffic signalization was identified as a subject of concern.

Landscaping: Two parties identified a concern for the provision of landscaping treatment in conjunction with the project.

Site-Specific Issues: Several parties expressed concerns related to specific facilities, sites and businesses located in proximity to the corridor. Accessibility was typically noted as the major concern.

5.3 COORDINATION DURING PREPARATION OF THE EIS

During preparation of the EIS, direct consultation efforts were conducted with three Federal agencies, with results as follows:

- U.S. Environmental Protection Agency (EPA)

As was noted in section 5.2 above, a letter of comment was received from EPA in response to the scoping process. In addition, a meeting (May 5, 1994) was held in the offices of EPA Region 9, attended by staff from the EPA, FHWA Region 9, FHWA California Division, Port of Los Angeles and project consultants, for the purpose of discussing the project and its associated environmental documentation. A further written response was received from EPA following this meeting. Agency staff was sent material pertaining to air quality to permit an early view of the project from this perspective. Copies of correspondence received from EPA are provided in Appendix F of this EIS. The following are responses to concerns raised in this correspondence.

- Comments previously made by EPA in 1991-93 concerned not only the Alameda Corridor project, but also proposed landfill improvements in the Ports of Los Angeles and Long Beach. These improvements have subsequently been redefined and environmental clearance under NEPA has been obtained.

- The present EIS examines the alternatives previously discussed in the EIR as well as the locally preferred alternative; therefore, the choice of reasonable alternatives is not being limited. Chapter 2 describes the alternatives considered and the reasons for rejecting those alternatives that are no longer under consideration.

- The proposed project would result in an improvement in local and regional air quality. This is discussed in Section 4.2. SCAG has issued a conformity determination for the project, evidence of which is provided in Appendix F.

- Further information has been provided regarding the Emergency Response Plan and the manner in which it will be developed. This information is provided in Section 4.5. Extensive coordination with a wide range of agencies is recognized as a project responsibility.

- The discussion of hazardous substances has been updated to include the most current information that is available.

- Response to EPA's question regarding water quality and pollution prevention can be found in sections 4.4 and 4.5 of the EIS.

- Environmental justice considerations in the context of the proposed project are discussed in the DEIS summary chapter.

- U.S. Department of the Interior, Fish & Wildlife Service (USF&WS)

The USF&WS was asked to provide its opinion regarding the supposition that the proposed project would not have an adverse effect on Federally-listed species, pursuant to Section 7 of the Endangered Species Act. The USF&WS responded affirmatively and a copy of the correspondence is provided in Appendix F of this EIS.

- U.S. Army Corps of Engineers

Two meetings were held with representatives of the U.S. Army Corps of Engineers (USACOE) on May 17 and 19, 1994, for the purposes of a) providing Corps staff with an overview of the project and b) obtaining Corps input regarding hydrology and regulatory concerns. The result of this consultation was an expressed opinion on the part of Corps staff that no issues of substance would be forthcoming with regard to either subject. A copy of a memorandum to this effect is provided in Appendix F of this EIS. It has been determined that a nationwide Section 404 permit, pursuant to regulatory issues; a Rivers and Harbors Act Section 10 permit, for construction in Corps-controlled waterways; and appropriate hydraulic permits will likely be necessary. Appropriate certification and/or waivers from the Regional Water Quality Control Board will also be required. (See Section 4.4.3.3 of this EIS.) All of the above permits and approvals will be obtained during final design activities.

5.4 OVERVIEW OF THE EIS PUBLIC COMMENT PROCESS

The public comment period was officially initiated on January 27, 1995, by means of a Notice of Availability which was published in the *Federal Register*. This notice indicated a completion date for the public comment period of March 13, 1995. The Draft Environmental Impact Statement was mailed to a distribution list of approximately 200 elected officials, agencies, local jurisdictions, private organizations and companies, and individuals. The distribution list is shown in Appendix D. Summary volumes were sent to a list of approximately 100 parties, and letters indicating availability of the document were sent to a list of 170 parties. Copies of the document were also made available in a number of public libraries in the area.

Newspaper advertisements indicating the availability of the DEIS and providing pertinent information concerning a planned public hearing were published on two different dates in each

of the following newspapers: *Los Angeles Times, South Bay Edition*; *Los Angeles Times, Southeast Edition*; *Long Beach Press Telegram*; *Compton Bulletin/Carson Bulletin*; *Wilmington Beacon*; *Los Angeles Sentinel*; *Korea Times* (in Korean); *La Opinion* (in Spanish); *Lynwood Journal*. During the course of the public comment period, requests for copies of the DEIS were received and filled from approximately 90 parties.

A public hearing was held at Bateman Hall in the City of Lynwood, on March 2, 1995. Two sessions were conducted; one in the afternoon, and one in the evening. Each session was chaired by a hearing officer and before testimony was taken, a brief overview of the project was presented. Approximately 90 persons were in attendance at the two sessions combined. Testimony was received from 30 persons at the two sessions combined.

The predominant testimony that was heard at the public hearing was concerned with the depressed/covered trainway/trenchway facility that had been suggested by the City of Compton. About half of the persons giving testimony discussed this issue. A substantial proportion of speakers raised other issues, also associated with the City of Compton and its relationship tot he proposed Corridor. Among these issues were (1) concern about everyday vehicle access, (2) potential impacts on schools, (3) law enforcement and public safety issues, (4) concerns about graffiti, (5) a perception that there would be a large increase in trench traffic, (6) job creation and the need for employment outreach efforts, and (7) project cost. Other comments raised included (1) potential grade separations in the City of Lynwood, (2) the I-105/Imperial Highway Interchange, (3) parking, (4) landscaping, and (5) business access along the Corridor.

The public comment period, which was originally scheduled to close on March 13, 1995, was extended to March 27, 1995 for the City of Compton.

Written comments (for which responses are provided in Section 5.5) were received from the following:

Federal Agencies

U.S. Environmental Protection Agency, Region IX
Interstate Commerce Commission / Surface Transportation Board (ICC/STB)

Regional Agencies

Metropolitan Water District of Southern California
San Gabriel Valley Council of Governments
Southern California Association of Governments

County Agencies

Los Angeles County Department of Public Works
Los Angeles County Fire Department
Los Angeles County Metropolitan Transportation Authority
Los Angeles County Sanitation Districts

Los Angeles Unified School District

Local Jurisdictions

City of Alhambra
City of Azusa
City of Compton
Compton Unified School District
City of El Monte
City of La Verne
City of Long Beach
City of Los Angeles Fire Department
City of Los Angeles Planning Department
City of Los Angeles Department of Transportation
City of Lynwood
City of Monrovia
City of Monterey Park
City of San Gabriel
City of Santa Fe Springs
City of Vernon
City of Walnut

Private Organizations, Businesses and Individuals

ARCO Products Company
Automobile Club of Southern California
K.G. & M.C. Heath
Heritage Estates of Compton
San Gabriel Valley Commerce and Cities Consortium
Shell Oil Company
Texaco, Inc.
Watson Land Company

Comments were heard (for which responses are provided in Section 5.6) at the public hearing sessions from the following parties:

Carl Robinson; representing Congressman Walter Tucker
Omar Bradley; Mayor, City of Compton
Harold Cebrun; Superintendent, Compton Unified School District
Captain Steve Roller; Compton Police Department
John Schlotterbeck, representing the City of Compton
Joseph Wang; City Engineer, Lynwood
Herbert Arceneaux
Yvonne Arceneaux
Gwendolyn Bouffard
Sydney Bowen
Alfonso Cabrera
Roy Coleman
Ellis Cooke
Mr. Cortez

Fred Cressel
Charlene Diggs
Vernice Dredd
David Gomez
Emily Hart-Holifield
Reverend Lewis
Fred Parker
Ralph Prince
Newton Prothro
Gladys Russell
Marjorie Ship
Essie Spellman
Ulysses Terry
John Thirkill
Walter White
Jardine Wilson

5.5 WRITTEN COMMENTS AND RESPONSES

The following pages contain the written comments that were received on the Alameda Corridor DEIS and the responses to those comments.

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX
75 Hawthorne Street
San Francisco, CA 94105-3901



MAR 1 0 1995

Fred J. Hempel, FHWA Division Administrator
Federal Highway Administration
980 9th Street
Sacramento CA 95814

Dear Mr. Hempel:

The US Environmental Protection Agency (EPA) has reviewed the January 1995 Draft Environmental Impact Statement (DEIS) for the **ALAMEDA CORRIDOR PROJECT, LOS ANGELES COUNTY, CALIFORNIA.** The Final Environmental Impact Report (FEIR) that was approved by the Alameda Corridor Transportation Authority (ACTA) in January 1993 is considered to be a part of this DEIS. Our comments on the DEIS are provided pursuant to our responsibilities under the National Environmental Policy Act (NEPA), Section 309 of the Clean Air Act, and the Council on Environmental Quality's (CEQ) Regulations for Implementing NEPA (40 CFR 1500-1508). EPA provided written comments on the project to the Federal Highway Administration (FHWA) on February 24, 1994 (on the Notice of Intent) and on June 3, 1994 (on the Air Quality Analysis Methodology and supplemental scoping comments), and met with the FHWA, the Port of Los Angeles and the EIS consultant on May 5, 1994. We have the enclosed comments to offer on the DEIS, the FEIR, and the EIS's supporting documentation (e.g., the final technical report on carbon monoxide conformity analysis).

The Alameda Corridor is a proposal for a consolidated railroad link between the Ports of Los Angeles and Long Beach and the national and regional rail systems. The proposed corridor is 20 miles long, centered along Alameda Street, and extends from downtown Los Angeles to the ports. Currently, rail service is provided on three separate lines (Southern Pacific; Union Pacific; and Atchison, Topeka & Santa Fe). According to the Notice of Intent, the fundamental purpose of the project is to consolidate freight rail service along the Alameda Corridor to enhance the efficiency of moving goods between the ports and downtown Los Angeles while reducing delays in automotive traffic. The completed facility would contain two mainline railroad tracks and a maintenance access road within a depressed trainway extending from downtown to the vicinity of State Route 91 (SR-91) and within an at-grade trainway from SR-91 south.
The reconstruction of Alameda Street is also included as part of the project.

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Based upon our review of the DEIS, the FEIR and associated documentation, we have rated the DEIS as **Category EC-2, Environmental Concerns - Insufficient Information** (see enclosed "Summary of Rating Definitions and Follow-Up Action"). This rating reflects our primary concerns with the assessment of the project's potential air impacts and the mitigation measures described in the project documentation.

We commend the FHWA and Caltrans for presenting a wide array of air mitigation measures in the DEIS. The need to improve the South Coast Air Basin's air quality by any innovative means is obvious inasmuch as the basin is the nation's only "extreme" ozone nonattainment area and is one of only three "serious" carbon monoxide (CO) nonattainment areas nationwide. While considerable efforts have been expended by public and private sectors to reduce emissions from stationary sources, mobile sources continue to be a major factor in the basin's air quality problems. In that regard, and although your documentation suggests that the proposed project would help reduce air pollution levels, we believe there are opportunities to implement additional mitigation measures to further reduce air impacts. As an example, we recommend that a program to reduce vehicle miles traveled by construction workers be included in the Final Environmental Impact Statement (FEIS). In the same vein, it appears that background concentrations were not included in the PM10 modeling analysis. This suggests that additional PM10 mitigation may be required to avoid violations of the 24-hour Federal PM10 standard.

We also found instances in which we could not determine the accuracy of the air data. For example, the DEIS states that train trips in the corridor will triple between now and 2020 but locomotive emissions are projected to rise by factors of 15 to 60. We recommend that FHWA and Caltrans review the air data presented in the DEIS to ensure that the data provides an accurate depiction of the air impacts associated with the proposed project. In addition, the extremely complex nature of the project documentation, i.e., the FEIR being used as a volume of the DEIS, makes it difficult to ascertain the validity of the data: it is difficult, if not impossible to tell whether all portions of the FEIR are completely valid or whether they have been subsumed by conclusions and data in the DEIS. In that regard, it would be helpful if the FEIS contained a table identifying the sections or pages of the FEIR which are no longer valid, if that is the case. These issues are discussed in greater detail in the attached comments. (1)

We would like to commend FHWA and Caltrans for agreeing to provide a worst-case emergency response plan to deal with toxic and hazardous material incidents along the corridor, prompted by a projected increase in hazardous material freight shipments. We are also pleased with language in the DEIS regarding the reuse

and recycling of waste products from the existing rail lines (e.g., steel, lumber, asphalt). This is in the spirit of the CEQ's memorandum to Federal agencies on including pollution prevention techniques and mechanisms in agency NEPA documents. We suggest that for both areas (worst-case emergency planning and waste product reuse) the FHWA include appropriate commitments in the FEIS and Record of Decision.

We appreciate the opportunity to comment on the DEIS. Please send two copies of the FEIS to my attention (code: E-3) when it is filed with our Washington, D.C. office. If you have any questions, require additional information or should you desire to meet to discuss any of our comments, please call me at 415-744-1584 or have your staff call David Tomsovic at 415-744-1569.

Sincerely,



David Farrel, Acting Chief
Office of Federal Activities

cc: Glenn Clinton, FHWA, Sacramento
Douglas Bennett, FHWA, Sacramento
Katiann Wong-Murillo, FHWA, San Francisco
William Gelston, FRA, Washington, D.C.
Ronald J. Kosinski, Caltrans, Los Angeles
Ralph Appy, Port of Los Angeles, San Pedro
Gary L. Peterson, Myra Frank & Associates, Los Angeles

Enclosures: 2
M.I. #1004

SUMMARY OF RATING DEFINITIONS AND FOLLOW-UP ACTION

Environmental Impact of the Action

LO-Lack of Objections

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

EC-Environmental Concerns

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

EO-Environmental Objections

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

EU-Environmentally Unsatisfactory

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

Adequacy of the Impact Statement

Category 1-Adequate

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

Category 2-Insufficient Information

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

Category 3-Inadequate

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

*From: EPA Manual 1640, "Policy and Procedures for the Review of Federal Actions Impacting the Environment."

MAR 1 0 1995

DETAILED COMMENTS BY US ENVIRONMENTAL PROTECTION AGENCY ON DRAFT EIS, ALAMEDA CORRIDOR PROJECT, LOS ANGELES COUNTY

AIR QUALITY

Estimated Air Emissions

Construction Emissions: The DEIS (e.g., Tables 4-1 and 4-2) includes estimates of construction-related air emissions for the proposed project and project alternatives. However, it appears that the DEIS did not factor in emissions due to commuting trips by construction workers. Similarly, proposed construction mitigation measures (Tables 4-9 and 4-10) ignore emissions from construction worker commute trips (although we recognize that p. 4-47 states "Carpooling will be arranged among construction workers, perhaps involving the use of project vans"). (2)

The FEIS (especially Table 4-9, Mitigation Measures for Construction Activities) should include mitigation to reduce emissions associated with trips by construction workers. We strongly encourage implementation of a trip-reduction plan to encourage construction employees to commute to work in ways other than single-occupant vehicles.

Regional Emissions: The estimate of regional pollutant emissions appears to contain several shortcomings, and the discussion on regional emissions is confusing and difficult to follow. Regional emissions include pollutants produced by trucks, autos and trains (FEIR, p. 4-50). The DEIS directs the reader to FEIR section 4.3.4 for a detailed discussion of regional emissions, however only locomotive emissions and emissions from vehicle delays are included in the DEIS table on regional emissions. (3) There appears to be no discussion of either truck emissions or non-idling vehicle emissions in the DEIS. Thus, the reader needs to constantly refer back to the FEIR while searching for the correct emissions data. Whether the reader has indeed captured the true picture of regional emissions is questionable.

Also, the locomotive emissions summarized in Table 4-3 of the DEIS appear suspect when existing emissions are compared with those for both No Project and the consolidated corridor alternatives. Locomotive emissions in 2020 are almost 20 times greater than the emissions under existing conditions despite only a 3-fold increase in locomotive miles traveled per day. No explanation is included to illuminate this apparent discrepancy (please refer to the section below on Locomotive Emissions for greater detail). (4) In addition, no single source or table summarizes total pollutant emissions for all sources under existing, 2010 or 2020 scenarios. This information and data should be provided in the FEIS.

Air Pollutant Modeling

PM10 Modeling: PM10 dispersion modeling was used to estimate worst-case scenarios of PM10 concentrations that would result from project construction. Emissions were estimated for only the 24-hour averaging period because construction emissions at any one site would be temporary, lasting less than a year. One shortcoming of the PM10 modeling analysis is that it does not include background concentrations. With mitigation, the maximum predicted ambient concentrations range from 121 micrograms per cubic meter ($\mu g/m^3$) to 139 $\mu g/m^3$. Although these concentrations are less than the Federal ambient standard of 150 $\mu g/m^3$, they do not include background concentrations. With 24-hour background concentrations as low as 12 $\mu g/m^3$, the federal 24-hour PM10 ambient standard could be violated. The FEIS should include PM10 dispersion modeling of construction emissions along with background concentrations. Additional mitigation measures may be necessary to reduce PM10 emissions so that they do not contribute to violations of the Federal 24-hour PM10 standard. (5)

Additionally, hotspot modeling of local PM10 impacts shows an exceedance of the 24-hour Federal PM10 standard at Jordan High School. Proposed mitigation was assumed (e.g., water spraying and sweeping) to reduce concentrations below the Federal standard. It is not clear whether Jordan High School was the only close proximity site modeled, nor is it clear if AP-42 emission factors for reintraned road dust were used to determine PM10 emissions. It is also unclear whether direct PM10 emissions from vehicles (including exhaust, tire wear and brake wear) were included in the calculations. The FEIS should provide further discussion and data in this regard as well. We expect that EPA will issue its PM10 model for transportation conformity in May 1995, which may prove useful in finalizing the Alameda Corridor NEPA documentation. (6)

Carbon Monoxide (CO) Modeling: The Alameda Corridor project is a major new transportation facility located in a CO nonattainment area. Consequently, CO modeling was conducted to determine whether the project would cause or contribute to exceedances of the CO ambient standards at sensitive receptors located near congested roadways and intersections.

Several unresolved issues remain with the CO modeling analysis. One CO modeling issue that should be addressed in the FEIS is the selection of modeling locations. The DEIS added six locations (not included in the FEIR) and dropped one location (55th Street & Long Beach Avenue). The FEIS should explain why the one intersection was dropped. (7)

The six new locations include existing at-grade railroad crossings that appear to have been added to demonstrate the project's air quality benefits. These six locations were used to (8)

evaluate the differences between Alternative 2.1B and the No Build Alternative. Although the project will clearly reduce CO concentrations when delays are minimized or eliminated (assuming traffic volumes remain unchanged), a more appropriate approach.. would involve adding the three Alameda corridor intersections with the worst levels of service (as measured by volume-to-capacity [V/C] ratios) to the CO modeling analysis. As shown in Table 4-15 of the "Transportation and Circulation" section, these three intersections include 25th Street & Santa Fe Avenue (2020 V/C ratio of 1.77 with project); Nadeau Street & Alameda Street (2020 V/C ratio of 2.00 with project); and Firestone Boulevard & Alameda Street (2020 V/C ratio of 1.81 with project). These intersections appear to be more likely to show CO violations in 2020 and thus should be analyzed in the FEIS. (8)

A second unresolved issue is that the CO modeling analysis conducted for the FEIR included train emissions, while the DEIS apparently does not. Those locomotive emissions, even though they may be a small fraction of the total CO emissions along the corridor, should be included in the analysis. (9)

A third unresolved issue involves the traffic data used in the CALINE4 CO modeling analysis. All the Alameda corridor intersections show a decrease in turning movement traffic volumes in 2010 compared with existing conditions. No explanation is provided as to why traffic volumes drop between existing and 2010 conditions. These decreases in turning movements are in contrast to predicted increases in vehicle miles traveled (VMT) within the Alameda Corridor, as described in the Air Quality Impact Analysis Technical Report for the Alameda Corridor EIR. That report states that VMT is projected to increase 238 % for trucks and 187 % for autos during the interval between existing conditions and 2010. A related issue is that the link volumes shown in the Alameda Corridor Traffic Circulation Study Appendix F 2010 Intersection Analysis do not seem to match the volumes used in the CALINE4 analysis. This apparent inconsistency should be explained in the FEIS. (10)

Finally, upon comparing the CO modeling in the FEIR with the modeling in the DEIS, the following inconsistencies in the Alameda Street/Alondra Boulevard analysis need to be clarified in the FEIS: (11)

- the coordinates for the links and receptors were changed, making it difficult to compare the FEIR and the DEIS;
- the number of links for this intersection were reduced from 13 in the FEIR to six in the DEIS;
- the 56 sensitive receptors in the FEIR were reduced to 11 receptors in the DEIS;
- the peak-hour vehicle volumes in the FEIR are different from those shown in the DEIS; and

- intersection speeds used in the vehicle idle analysis are not the same in the DEIS compared to the FEIR. (11)

Air Mitigation

Construction mitigation measures listed in the DEIS are not clearly tied to the impacts they are designed to mitigate. Although most construction mitigation measures are designed to reduce PM10 impacts, it is unclear how much reactive organic gases (ROG), oxides of nitrogen (NO_x) and other pollutants will be reduced by the emission reductions proposed for construction equipment. Also, it is unclear why two separate tables are included for construction-related mitigation measures. (12)
As previously noted, the mitigation section (Tables 4-9 and 4-10) does not include measures to reduce the number of construction worker commute trips. These issues should be further discussed in the FEIS. Appropriate commitments should be included.

Locomotive Emissions: The DEIS (p. S-4) states that in 1993 a total of 32 trains per day operated to and from the ports, and by 2020 an estimated 97 trains per day will move in and out of the ports. It seems reasonable to assume that 2020 locomotive emissions will be approximately 300 % greater than 1993 locomotive emissions (although the 2020 emissions could be even less because cleaner trains will become more common by 2020 as older, more polluting locomotives are retired). Nonetheless, the locomotive emissions projected in the DEIS (Table 4-3) are significantly greater than a factor of three. For example, the table depicts CO emissions as being 300 lbs/day in 1990 (baseline) increasing to 6,983 lbs/day in 2020, a 23-fold increase over the baseline. Similar (1990-2020) increases are depicted for the other criteria pollutants as follows: (13)

NOx emissions are 15 X greater in 2020,
ROG emissions are 62 X greater in 2020,
PM10 emissions are 18 X greater in 2020, and
SOx emissions are 16 X greater in 2020.

It is unclear why emissions would rise by factors of 15 to 62 if the number of trains are projected to rise by a factor of 3. The FEIS should clarify whether the figures provided in Table 4-3 are accurate. Any changes should be reflected in a modified conformity analysis as well.

Conformity

The conformity section (DEIS, pp. 4-14 and 4-15) discusses the regulations on federal conformity for transportation projects. The only unresolved issues regarding conformity involve appropriate resolution of the CO modeling concerns discussed above and those associated with the accuracy of data concerns expressed herein. (14)

Rail Electrification

The Southern California Accelerated Rail Electrification Program estimated that electrification of freight trains would decrease 2010 freight rail emissions in the South Coast Air Basin by over 76 % (DEIS, p. 4-15). However, the DEIS states that substantial cost is associated with line electrification. Because of cost, "electrification...is not proposed at the present time" but "the ...project would be designed to permit...installation of electrification equipment and hardware." We suggest that the FEIS quantify the cost of electrifying the Alameda Corridor, both now and in the future. (15)

Air Toxics

The DEIS (p. 4-5) states that "Benzene and 1,3-butadiene are the only indicator toxic pollutants emitted in appreciable quantities from mobile source exhaust, and therefore are the only toxic pollutants relevant to the Alameda Corridor project." Although it may be appropriate to say that only two air toxics are emitted in "appreciable quantities," the FEIS should address other air toxics that may be emitted by the project. Unlike criteria pollutants, air toxics need not be released in "appreciable quantities" before public health may be harmed. It would also be useful if the FEIS included a definition of "appreciable quantity." (16)

Under the Federal Clean Air Act, asbestos is defined as a hazardous air pollutant (air toxic). The FEIS should clarify whether any current rail facilities or infrastructure along the corridor have asbestos-containing materials (ACMs) which may be disturbed or removed. If ACMs are disturbed or removed, compliance with the Federal Clean Air Act, its asbestos NESHAPS (National Emission Standards for Hazardous Air Pollutants), and the local air district's asbestos rule may be necessary. (17)

HAZARDOUS MATERIALS RESPONSE PLAN

We note that the DEIS (p. 3-45) states that approximately 10 % of freight railcars moving through the region carry materials classified as "hazardous," and estimates are that 5-10 % of the containers shipped through the Port of Long Beach contain hazardous liquids (fuels, chemicals). Because the corridor will see a tripling of rail traffic in the next 25 years, we may safely presume that hazardous material shipments will increase significantly by 2020. Because of this, we appreciate the discussion on pp. 4-60 and 4-61 of the DEIS regarding emergency response planning (data collection and developing specific scenario plans). We note that p. 4-61 states that the plans "will be geared toward a worst-case accident." We fully support the strategy outlined on pp. 4-60 and 4-61, and recommend that (18)

firm commitments for its implementation be included in the FEIS and Record of Decision. Also, please send a copy of the draft emergency response plan to EPA as soon as it is available for review by agencies. The plan should be directed to: Gordon Woodrow (code: H-8-5), US EPA, 75 Hawthorne Street, San Francisco CA 94105. In developing your plan, you may wish to contact Mr. Woodrow directly at 415-744-2212. (18)

TOXIC SUBSTANCES: PCBs

It is unclear whether polychlorinated biphenyls (PCBs) are presently in use or in storage along any of the rail corridors proposed for consolidation. It is possible that PCBs may be present in the project area from at least three sources or activities associated with the railroad industry: a) the use of transformers and other equipment containing PCBs as coolants, which frequently may be in very high concentrations, up to 50,000 parts per million; b) in soils along tracks and fences due to the past use of PCB-contaminated oils as a weed defoliant; and c) the transport of PCB-contaminated products destined for waste disposal, which may have leaked or ruptured during the transportation process. (19)

If PCBs may be (or may have been) present in the project area, we recommend that the FEIS discuss the issues of use, storage and/or discharges. If PCBs are presently used or stored in the railroad areas, the FEIS should discuss compliance with EPA's PCB rule. The FEIS should note that TSCA and EPA's PCB rule (40 CFR Part 761) regulate the use, storage and disposal of PCBs and PCB-contaminated equipment and substances.

HAZARDOUS WASTE

The FEIS should discuss whether any rail lumber has been treated with creosote or other wood preservatives which may render the lumber as hazardous waste under the California Health & Safety Code. If it is determined that lumber has been treated with creosote or other hazardous chemicals, we recommend that the California EPA [Dept. of Toxic Substances Control] be contacted to determine current State requirements on the reuse, disposal (resale or landfilling) or other disposition of this lumber. (20)

LEAD RE-ENTRAINMENT

The FEIR (pp. 4-72 and 4-73) describes how historic lead concentrations along the corridor (from leaded gasoline) may be re-entrained during project construction, thereby adversely affecting school children in the project area. The FEIR states, (21)

> "During construction surface soils will be excavated and removed from the construction site. Following placement of pilings and other structural supports, new fill and subbase

will be brought in to replace old fill materials....[N]ew pavement and sidewalks will be installed....The historical deposition of lead into the soil would therefore be removed as a result of the project." (FEIR, p. 4-73).

The DEIS (p. 4-15) appears to carry on this commitment by stating "If contaminated soil is encountered during construction of the proposed project, it will be immediately remediated using techniques approved by appropriate agencies." We strongly recommend that the FEIS and Record of Decision reflect a commitment to reduce, as far as practicable, lead levels in soils in the project area. Appropriate public notification prior to disturbance of suspected contamination areas is highly recommended. Also, should lead-contaminated areas be disturbed during the school year, it may be beneficial to work with the school districts or other school managers so that childrens' exposure to airborne lead is minimized during recess, exercise periods etc. Other adjacent facilities with young children present (such as pre-schools or daycare centers) should also be notified if airborne lead migration is possible during project construction. (21)

POLLUTION PREVENTION MEASURES

EPA appreciates that the project proponents have proposed to reuse and recycle, as far as practicable, existing rail steel, lumber and asphalt (DEIS, p. 4-47). We request that there be a firm commitment in the FEIS and Record of Decision to implement these measures. (2)

ENVIRONMENTAL JUSTICE

We appreciate the discussion in the DEIS (p. S-30) on the project's effect on low-income and minority communities, as required by Executive Order 12898. We understand that the US Department of Transportation (DOT) recently issued a guidance document concerning the implementation of this requirement for DOT projects. The FEIS should briefly discuss this new guidance in relation to the Alameda Corridor EIS documentation. (23)

EDITORIAL COMMENTS

1. DEIS cover page: The DEIS states that US EPA is a cooperating agency on the DEIS. This is in error. Although EPA worked with the FHWA in developing this DEIS, US EPA never officially agreed to be a cooperating agency. The cover page and other text in the FEIS should delete any reference to US EPA as a cooperating agency. (24)

2. DEIS, p. D-2: The listing of Federal agencies receiving a copy of the DEIS indicates "U.S. Coastal Commission." There is no agency called "U.S. Coastal Commission." The FEIS should delete (25)

any references to "U.S. Coastal Commission" (the agency is actually California Coastal Commission, a State agency).

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3. DEIS, 3.2.4: The EIS states, "The SCAB covers over 2428 hectares (6,000 acres)..." It appears that "6,000 acres" should in fact read 6,000 square miles. Los Angeles County is 4,070 square miles, Orange County is 798 square miles, and the South Coast Air Basin also contains portions of Riverside and San Bernardino Counties. The FEIS should be corrected to reflect 6,000 square miles, not 6,000 acres.

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4. DEIS, p. 5-3: The EIS states, "Comments previously made by EPA in 1971 concerned not only the Alameda Corridor...but...landfill improvements in the Ports...." The FEIS should be corrected to note that EPA provided several comment letters on these two projects in the period 1991-1993, not 1971.

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U.S. EPA, Region IX

(1) The air quality analysis presented in the EIR pertains to the No Build alternative and project alternatives 1.0 through 2.2. The analysis presented in the EIS, for purposes of clarity, repeats the analysis for the No Build alternative, and in addition includes analysis for Alternative 2.1B, which differs slightly from 2.1A. With exception of information associated with the No Build alternative presented in both the EIR and EIS, there should be no overlap in the analysis. Cross references between the EIR and EIS sections are provided for all topics, on page 3-1 of the EIS.

(2) Emissions associated with construction worker vehicle movements would be small in comparison with emissions produced by heavy construction equipment. However, it may be expected that 10-15% additional emissions could be generated by construction worker vehicles traveling to and from construction sites on a daily basis, if all workers were to drive to construction sites in single occupant vehicles. (It is not clear, however, how many of these would be new trips not otherwise traveling to other construction sites elsewhere in the region.) It is therefore reasonable to include additional mitigation to address this emission source. Consequently, a trip-reduction plan will be incorporated as an appropriate mitigation for construction worker travel.

(3) The EIS reflects new analytical information associated with the locally preferred alternative (2.1B), which, because it would not provide for new highway capacity, would not generate new vehicular trips in the Corridor. As a consequence, the operational emissions associated with vehicle travel would be the same for both the No Build and Consolidated Corridor alternatives shown in Table 4-3 of the EIS. This is so because there is a large amount of typical daily vehicular travel, and with the exception of delays at grade crossings, this traffic would not be affected by the Corridor. In addition, truck traffic is included in overall vehicular traffic. The differences between these two alternatives are beneficial effects and are primarily associated with reduced locomotive emissions and reduced vehicular idling (including truck idling at grade crossings); consequently these differences are shown in the table.

(4) As taken from EIR Table 4-17, in the regional traffic study area in the year 2020, the No Build alternative and project Alternative 2.1B would each result in the following estimated daily emissions (rounded to the nearest hundred): CO, 245,000 lbs.; NO_x, 150,700 lbs.; ROG, 16,200 lbs.; PM_{10}, 6,100 lbs.; SO_x, 6,000 lbs. Previously considered project alternatives which would increase roadway capacity (Alternatives 1.0, 2.1A, 2.1S, 2,2) would result in the following daily emissions estimates in the regional traffic study area in 2020: CO, 243,800 lbs.; NO_x, 120,600 lbs.; ROG, 14,000 lbs.; PM_{10}, 5,200 lbs.; SO_x, 4,400 lbs. These numbers have not been included in EIS Table 4-3 because they would tend to obscure the effects of the project. The emissions estimates shown in Table 4-3 were found to contain some errors, and these errors have now been corrected.

(5) The PM_{10} modeling analysis presented in the DEIS and FEIR did not include background concentrations. Background PM_{10} concentration data are collected at two air monitoring stations near the proposed project: Los Angeles and Long Beach (see Figure 4-6 in the FEIR for locations of these monitoring stations). At these stations, annual maximum 24-hour PM_{10} concentrations for years 1990 to 1993 ranged from 67 to 152 $\mu g/m^3$ and

annual arithmetic average concentrations ranged from 37 to 58 $\mu g/m^3$ (1994 AQMP, SCAQMD, 1994). The federal Ambient Air Quality Standard for PM_{10} (150 $\mu g/m^3$) was exceeded 1 day in 1990, 1 day in 1991, and no days in 1992 and 1993. The California Ambient Air Quality Standard (50 $\mu g/m^3$) was exceeded approximately half of the time in all years.

The PM_{10} modeling analysis predicted a maximum 24-hour average concentration of 277 $\mu g/m^3$ during construction. However, mitigation measures could reduce this level significantly. The DEIS states that water spraying of exposed areas would reduce this concentration by half to 139 $\mu g/m^3$. Additional mitigation measures listed in Table 4-9 of the DEIS will also be implemented. The combined mitigation measures (shown in Table 4-9) have an emissions reduction efficiency of approximately 70% percent (based on an average efficiency for each range). Assuming this combined efficiency, the maximum 24-hour average concentration resulting from construction would be 83 $\mu g/m^3$. Under worst case conditions, with a background concentration of 152 $\mu g/m^3$, construction emissions would increase the severity of a federal standard violation. One of the proposed mitigation measures is to suspend grading activities when wind speeds exceed 40 kilometers (25 miles) per hour. Therefore, proposed construction activities with the mitigation measures listed in Table 4-9 are not likely to cause a violation of the federal standard under such conditions. Also, the project will need to comply with SCAQMD Rule 403 which requires minimization of visible fugitive dust emission from construction activities. Lastly, all construction emissions from the project are temporary in nature.

(6) As described on page 4-1 of the *Air Quality Impact Analysis Technical Report for the Alameda Consolidated Corridor EIR* (Radian, December 1992), Jordan High School was not the only modeled receptor used to assess the impact of PM_{10} emissions from construction activities. A receptor grid (in x and y cartesian coordinates) with 50 meter spacing and discrete receptors, assumed to be located approximately 50 feet (and spaced 100 feet apart) from the area under construction were used to identify the maximum PM_{10} concentration. The *Air Quality Impact Analysis Technical Report* provides a detailed description of the PM_{10} modeling approach and ISC2 air dispersion model input and output files.

PM_{10} emissions from construction activities were estimated using emission factors and equations presented in Table A-9-9 of the SCAQMD CEQA Handbook. Table 3-3b of the *Air Quality Impact Analysis Technical Report* presents each of these equations and factors, as well as associated emissions. The emissions included: open storage piles, storage pile filling or truck dumping, truck filling or storage, truck travel on paved roadways (no street cleaning), dirt/debris pushing operations, graded surfaces, topsoil removal, earthmoving operations (cut and fill), and dirt hauling with trucks.

U.S. EPA guidelines for PM_{10} transportation conformity were not available at the time the DEIS was circulated for public comment. Therefore, vehicular sources of PM_{10} emissions are not included in the PM_{10} modeling analysis.

(7) The intersection of 55th Street & Long Beach Avenue was dropped because project Alternative 2.1B proposes no improvements in that vicinity. There would be no difference

in pre- and post-project CO emissions at that location. The six locations which were added to the analysis in the EIS were added to examine the effects of the proposed project on localized CO on a broader geographic basis. These effects, which primarily are associated with reduced vehicular idling time, had not been examined in the EIR. These effects would occur at the locations identified in Tables 4-4 through 4-8 for all consolidation alternatives.

(8) A total of eleven intersections were considered in the carbon monoxide (CO) conformity analysis. Five of these intersections are along the Alameda Corridor and were analyzed previously in the FEIR (see the response to comment 7 above for an explanation of why one intersection was excluded). These intersections were evaluated in the FEIR based on high traffic volumes and proximity of residences and sensitive receptors, and they were considered in the DEIS for consistency.

The six new intersections that were analyzed in the CO conformity analysis were chosen based on three different criteria:

- Proximity of residences and sensitive receptors (e.g., schools, hospitals);
- High volumes of traffic; and
- Existence and length of train delays.

Consideration was not solely based on traffic volumes, but also on whether there were residences or sensitive receptors in close proximity to the intersection where individuals may actually be exposed to increases in CO concentrations. A field survey of all study area intersections was conducted to identify such locations where residences or sensitive receptors occurred. Additionally, outside of the Alameda Corridor, intersections with existing train delays were selected to estimate potential reductions in CO concentrations due to elimination of the delays after project implementation.

The commentor suggests that three additional intersections be added to the carbon monoxide (CO) conformity analysis (25th Street & Santa Fe Avenue, Nadeau Street & Alameda Street, and Firestone Boulevard & Alameda Street) because these intersections have the worst levels of traffic service (as measured by volume-to-capacity (V/C) ratios) in the year 2020. Although these intersections do have the highest V/C ratios based on the traffic analysis, the Nadeau Street and Firestone Boulevard intersections with Alameda Street have a greater estimated V/C ratio under the No-Build alternative. Therefore, implementation of the project would actually reduce the potential for CO violations at these locations.

At 25th Street and Santa Fe Avenue, the addition of a lane for eastbound right turn traffic (in addition to planned left turn and through lanes) will lower the V/C ratio to 1.31, which is very close to the No Build V/C ratio of 1.30 for this intersection. Therefore, implementation of the project is not expected to increase the number of CO violations at this location.

The selected modeled intersections are appropriate to illustrate the potential for CO violations along the Corridor, and also reductions in CO at regional railroad crossings due

to elimination of train delays. The latter aspect of the project is a benefit that should to be considered in the analysis.

(9) The commentor suggests that train emissions be included in the DEIS analysis, as was done in the FEIR analysis. Results from the FEIR (at intersections along the Alameda Corridor) indicate that a maximum 1-hour CO concentration of 0.4 ppm was attributable to train emissions at maximally impacted receptors (based on all project alternatives) in the years 2010 and 2020, and in some cases the rail contributed 0 ppm at maximally impacted receptors (see Tables 4-19 through 4-24 in FEIR). Even if the maximum 1-hour concentration of 0.4 ppm were added to the traffic contributions indicated in the DEIS (Table 4-7), CO concentrations would still be well below the federal 1-hour standard of 35 ppm. A maximum 8-hour CO concentration of 0.3 ppm attributable to the Corridor was determined for the FEIR. Addition of this maximum 8-hour 0.3 ppm CO concentration to the 8-hour values listed in Table 4-8 of the DEIS would not result in concentrations greater than the federal 8-hour standard of 9 ppm.

Overall, the train emissions contribute an insignificant amount to the CO concentrations (less than 3%) and do not change the conclusions of the conformity analysis.

(10) The commentor notes that the traffic data used in the CALINE4 modeling for the DEIS do not match those presented in the FEIR's Alameda Corridor Traffic Circulation Study Appendix F, 2010 Intersection Analysis. The volumes used for Alternative 2.1B in the DEIS match those of the Null Condition. This is in contrast with Alternative 2.1 A in the FEIR, which had generally higher growth rates.

Traffic volumes were predicted to have negative growth rates under the Null Condition in comparison to existing conditions along the Alameda Corridor. The sources of the growth rates are the EMME/2 traffic model results prepared in 1991. The negative growth rates were attributed to traffic diversions to the Century Freeway (I-105) which was then under construction, the high occupancy vehicle lanes along the Harbor Freeway, and improved roadways within the study area. Since Alternative 2.1B volumes match those of the Null Condition, the intersection along the Alameda Street show lower volumes than existing conditions.

(11) Although the locally preferred alternative (Alternative 2.1B) is similar to Alternative 2.1A (analyzed in the FEIR), the projects are not identical. Major differences are four traffic lanes along Alameda Street (as opposed to six lanes considered in Alternative 2.1A), addition of left turn lane pockets at several intersections that were not included in Alternative 2.1A, and several minor design modifications in selected locations that differ from Alternative 2.1A.

The Alameda Street/Alondra Boulevard intersection configuration is different between the two alternatives, and therefore new links were developed (a figure of the Alternative 2.1B street configuration is included in the *CO Conformity Analysis for the Alameda Corridor EIS*, Radian, June 1994). Additionally, the number of receptors was reduced to focus on

areas where maximum concentrations were expected and to relate to the locations of residences and a retirement home which lie in close proximity to the intersection.

The peak-hour vehicle volumes in the DEIS are different from the FEIR because the projects are not identical and a new traffic analysis was conducted. Intersections speeds are different to account for differences in link lengths and configurations.

(12) The text in Section 4.2.6.1 has been reworded and Tables 4-9 and 4-10 have been combined and appropriately annotated to address the comment.

(13) The calculations shown in the table were found to be in error. The analysis has been recalculated and the results are displayed in a revised Table 4-3. As is shown in the revised table, the consolidated corridor would result in net savings in emissions for all criteria pollutants. The savings would be most dramatic for NO_x and CO, and therefore would be supportive of EPA's air quality objectives in the South Coast Air Basin.

(14) The comment is noted. Data found to be in error have now been corrected. The revised locomotive emissions analysis still indicates the beneficial effects of freight rail consolidation, both at the regional and local scales. The conformity finding still holds.

(15) The Alameda Corridor project has been developed with electrification in mind, and is being designed to permit the installation of the necessary equipment to allow the corridor to be electrified at such a time as it becomes practical to do so. At the present time, however, there are no plans to electrify freight rail operations in the South Coast Air Basin (SCAB), and therefore the Alameda Corridor, if it were to be electrified, would consist of only 20 miles of electrification out of several hundred miles of freight rail tracks in the SCAB. This is not a practical approach to the pursuit of electrification, since it cannot be justified from a cost perspective (it would require a large initial investment which would be amortized over only 20 miles of track) and also since it would imply changing diesel locomotives for electrically powered locomotives in downtown Los Angeles, which would be highly impractical, inefficient, and potentially counterproductive. An overview of regional rail electrification policy and concepts has been prepared by the Southern California Regional Rail Authority and can be found in the *Southern California Accelerated Rail Electrification Program* (SCRRA, February 1992). The study estimated the capital costs for electrifying passenger rail services, but it did not estimate the costs associated with freight rail activity.

(16) Page 4-5 of the DEIS states that "benzene and 1,3-butadiene are the only indicator toxic pollutants emitted in appreciable quantities from mobile source exhaust" and are therefore the only toxics relevant to the operational phase of the Alameda Corridor Project. Although other toxics (such as diesel and gasoline particulates, formaldehyde, ethylene, and acetaldehyde) are emitted from mobile sources, 1,3-butadiene and benzene are the major contributors to cancer risk (Carey, 1987). Therefore, "appreciable quantities" (as stated in the DEIS) is based on the percent contribution to cancer risk of a specific toxic compound. Because benzene and 1,3-butadiene are the main contributors to cancer risk

in the case of mobile source emissions, these two constituents were evaluated further in the DEIS.

As stated in the DEIS (page 4-5), implementation of the proposed project is expected to reduce regional emissions of air toxics. It is projected that there will be a net reduction of approximately 0.95 metric tons (1.05 tons/day) of ROG by the year 2020, due to improved railroad operating efficiency and reduced vehicle delays at grade crossings. As shown in Table 4-26 (page 4-72) of the FEIR, benzene and 1,3-butadiene are estimated to decrease by 28 and 24 lbs/day, respectively, based on the reduction in ROG. (Benzene emissions are expected to be 213 lbs/day and 186 lbs/day without project and with project, respectively. 1,3-butadiene emissions are expected to b 183 lbs/day and 159 lbs/day without project and with project, respectively.) Although similar calculations were not conducted for other toxics which contribute less overall to potential cancer risks, it is reasonable to expect a decrease in all air toxics generated from vehicle exhaust due to project implementation.

(17) No known asbestos-containing materials are expected to be impacted by the Alameda Corridor construction. If such materials are encountered during construction, they will be handled in accordance with applicable Federal Clean Air Act, Occupational Safety and Health Act and local air quality regulations.

(18) Appropriate commitments to the development of an emergency response plan will be included in the Record of Decision and copies of the plan will be submitted to the U.S.E.P.A. when available.

(19) Based on information obtained through previous studies, no known PCB-contaminated sites have been identified along the Alameda Corridor. If sites are disturbed by corridor construction that are found to contain contaminated soil or groundwater, the sites would be cleaned prior to or during construction in accordance with all applicable regulations and guidelines governing the removal and disposal of hazardous materials.

(20) Disposal or reuse of creosote or other wood preservative treated rail lumber will be addressed in the plans and specifications developed for the project which will require conformance with all applicable regulations governing hazardous materials.

(21) As indicated in the FEIR, surface materials and new pavement and sidewalks will be installed as a part of the proposed construction. Therefore, any historical deposition of lead into the soil would therefore be removed or contained as a result of the project. Specifications and approved construction practices which will minimize the potential for airborne lead migration will be referenced in the Record of Decision.

(22) The comment encouraging recycling and reuse whenever practical will be included in the Record of Decision.

(23) A Department of Transportation Order has been issued in draft form. This DOT Order addresses data collection and various analytical methods of determining "disproportionate

impacts" as well as proposed actions to address such situations. An analysis was conducted and it has been determined that there are no disproportionate adverse impacts on low income or minority populations (see Section S.10).

(24) The reference to U.S.E.P.A. as a cooperating agency will be removed from the cover.

(25) The reference to the U.S. Coastal Commission will be changed to the California Coastal Commission.

(26) The correction has been made.

(27) Comment noted. The year 1971 is a typographical error. This refers to the letter submitted by EPA in 1991 on the Notice of Intent to prepare a joint EIR/EIS for the Corridor. The NOI was subsequently withdrawn. Letters were received from EPA from 1991 until 1993.

INTERSTATE COMMERCE COMMISSION
Washington, DC 20423

OFFICE OF ECONOMIC AND ENVIRONMENTAL ANALYSIS

Mr. Peter C. Markle
Acting Division Administrator
U.S. Department of Transportation
Federal Highway Administration
Region Nine, California Division
980 - 9th Street, Suite 400
Sacramento, CA 95814-2724

January 4, 1995

Re: Comments on Draft Environmental Impact Statement - Alameda Corridor

Dear Mr. Markle:

This letter constitutes the Interstate Commerce Commission (ICC), Section of Environmental Analysis (SEA) comments on the Draft Environmental Impact Statement (DEIS) for the Alameda Corridor Project.

Our comments are limited in nature at this time because there is no formal proceeding before the Commission related to the construction and operation of the Alameda Corridor. As we noted in our letter to you dated December 15, 1994, we will be receiving a request for approval or exemption for a contemplated joint operating agreement that will govern the consolidated operations of the Southern Pacific Transportation Company, the Union Pacific Railroad Company, and the Atchison, Topeka and Santa Fe Railway over the rail portion of the Alameda Corridor.

We consider the DEIS to be comprehensive with respect to issues directly related to rail operations (our area of concern). We note that liberal use is made of 1991 data covering rail operations (28 trains per day) between downtown Los Angeles and the Ports of Los Angeles and Long Beach. As you are undoubtedly aware, rail traffic, intermodal traffic in particular, has been growing nationally at "double-digit" rates for about two years. Intermodal traffic has set annual records consistently since the early 1980's.

Such growth (much of it unforeseen as of 1991) has more than likely already increased traffic to and from the ports since 1991. We suggest that the pertinent base rail traffic data be updated together with the projections of rail traffic through

the year 2020. This, in turn, would enable an updating of base and projected data for air quality, noise levels, fuel consumption, etc., for both the Alameda Corridor and the existing rail routes. In all probability, the updated data will further substantiate the relevant findings in the DEIS.

We also suggest that consideration be given to quantifying the impact on rail traffic to/from the ports resulting from present and potential construction of on-dock, ship-rail transfer facilities for containers. These construction projects undoubtedly will tend to increase rail traffic on the existing rail lines and ultimately the Corridor itself.

After a proceeding is filed at the ICC and further information becomes available to SEA, we may need to perform some supplementary environmental analysis, such as a focused Environmental Assessment or Environmental Impact Statement.

Thank you for the opportunity to comment on the DEIS. Again, if you have any questions. Please feel free to contact Mr. Harold McNulty at (202) 927-6217 or me at (202) 927-6212.

Sincerely yours,

Harold McNulty for

Elaine K. Kaiser
Section Chief

Interstate Commerce Commission/Surface Transportation Board (ICC/STB)

The most recent railroad data (1993) that has been collected indicate a total of 32 through-trains per day operating to and from the ports, as compared with the 28 trains per day (1991) shown in the DEIS. The difference reflects an increase in trains per day that is within the expected range to achieve the 2020 planning year projection of 99 trains per day and is not a sufficiently large difference to warrant updating both the basic data itself and the various analyses which use this information. Moreover, since the number of trains projected for years 2010 and 2020 would remain the same (no change to these projections has been made), any differences that may be found would be such that the resultant out-year impacts\ determinations would only confirm the anticipated planning year impacts already discussed. It was therefore concluded that the 1991 railroad data need not be revised for purposes of the EIS.

Also, the development of on-dock rail transfer facilities has been included in the forecasted train movements for 2010 and 2020 that are assumed in all of the underlying planning for the Alameda Corridor project. Therefore, the effects associated with these facilities have already been accounted for.

MWD
METROPOLITAN WATER DISTRICT OF SOUTHERN CALIFORNIA

Office of the General Manager

March 8, 1995

Mr. Ronald Kosinski
Interim District Division Chief
Caltrans, District 7
120 South Spring Street
Los Angeles, California 90012

Dear Mr. Kosinski:

Draft Environmental Impact Statement
For the Alameda Corridor Project

We have received the Draft Environmental Impact Statement (EIS) for the Alameda Corridor Project. The Alameda Corridor Transportation Authority proposes to reconstruct Alameda Street to facilitate highway and train access from downtown Los Angeles to the ports of Los Angeles and Long Beach through the year 2020. The comments herein represent the Metropolitan Water District's (Metropolitan) response as an affected public agency.

Due to potentially significant costs and impacts upon existing Metropolitan water conveyance facilities, Metropolitan strongly objects to the locally preferred alternative for the project, Alternative 2.1B (Depressed trainway with reconstruction of existing Alameda Street). It would be necessary for Metropolitan to relocate facilities at the following locations:

- Palos Verdes Feeder (51-inch inside diameter) on Alameda Street, south of 25th Street;
- Palos Verdes Feeder (51-inch inside diameter) on 25th Street, east of Alameda Street;
- Palos Verdes Feeder (51-inch inside diameter) across Alameda Street at 55th Street;
- Middle Cross Feeder (79-inch inside diameter) across Alameda Street at 90th Street;
- West Coast Feeder (61-inch inside diameter) across Alameda Street at El Segundo Boulevard; and
- Middle Feeder (73-inch inside diameter) across Alameda Street at Greenleaf Boulevard.

1

[illegible] Grand Avenue, Los Angeles, California 90071 • Mailing [illegible] Los Angeles, California 90054-0153 • Telephone (213) 217-6000

The following facilities will also be affected by the proposed project: the Victoria-223rd Street Cross Feeder, the Second Lower Feeder, the Long Beach Lateral, and Service Connection LA-16. The attached maps show Metropolitan's facilities in relation to the proposed project. It will be necessary to consider all of these facilities in your project planning. (1)

Metropolitan identified those facilities that would be potentially affected by the proposed project in our responses (attached) to: the Notice of Preparation of a Draft Environmental Impact Report (EIR) and Draft EIS for the Alameda Corridor Project, dated January 25, 1991; the Draft EIR dated October 14, 1992; and the Public Scoping and Initiation of Studies for an EIS dated February 4, 1994. Although Metropolitan responded to the above documents, the Final EIR and Draft EIS have not addressed our concerns regarding the potential impacts that this project would have on Metropolitan's facilities. Metropolitan requests that the Final EIS assess the potential for impacts to Metropolitan's facilities and develop appropriate measures to avoid or mitigate for these impacts at no cost to Metropolitan.

The proposed project may also cause a disruption of water supplies to our downstream member agencies as a result of shut-downs associated with pipeline relocations. Since these shut-downs may be for substantial periods of time due to restrictive site conditions, Metropolitan will be required to coordinate potential impacts to water supply with the affected agencies. (2)

Metropolitan requests that the Final EIS indicate that Metropolitan's facilities will be affected by the proposed project and that the relocation of these facilities and/or mitigation measures necessary to protect these facilitits are part of the proposed project.

Metropolitan also requests that preliminary prints of all improvement plans for any activity in the area of Metropolitan's pipelines and rights-of-way be submitted for our review and written approval. You may obtain detailed prints of drawings of Metropolitan's pipelines and rights-of-way by calling Metropolitan's Substructures Information Line at (213) 217-6564. To assist you in preparing plans that are compatible with Metropolitan's facilities and easements, we have enclosed a copy of the "Guidelines for Developments in the Area of Facilities, Fee Properties, and/or Easements of The Metropolitan Water District of Southern California." Please note that all submitted (3)

plans must clearly identify Metropolitan's facilities and easement boundaries.

Additionally, as stated in our letters dated April 6, 1993 (attached) and February 4, 1994, Metropolitan requests that you submit a deposit in the amount of $60,000 to apply toward our engineering review of the project. (3)

We appreciate the opportunity to provide input to your planning process. If we can be of further assistance, please contact Mr. Leslie Barrett of Metropolitan's Engineering Division at (213)217-6245.

Very truly yours,

Laura J. Simonek

Laura J. Simonek
Senior Environmental Specialist

MME

Attachments

Metropolitan Water District

(1) The District's opposition to Alternative 2.1.B is noted for the record.

(2) The project has been in contact with the Metropolitan Water District regarding these mains and they have been included on the plans and the costs for relocation were included in the project costs. The needed relocations have been coordinated through the MWD office.

(3) Detailed coordination with the District would be undertaken during later design and stages. Discussions of any necessary fees, including fees for engineering review, will be conducted during subsequent design stages of the project.

San Gabriel Valley Council of Governments

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March 3, 1995

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Mr. Ronald Kosinski
Interim District Division Chief
CalTrans, District 7
120 South Spring Street
Los Angeles, California 90012

Re: Draft Environmental Impact Statement
Alameda Corridor Project

Dear Mr. Kosinski:

The San Gabriel Valley Council Of Governments (SGVCOG) appreciates the opportunity to present comments on the above-referenced environmental document.

(1) The Alameda Corridor project has the potential to create significant environmental impacts on a regional basis. These potential impacts, other than air quality, are not identified or discussed in the Draft Environmental Impact Statement (DEIS). As a result, their significance cannot be evaluated at this time.

(2) It is our understanding that the Alameda Corridor project is intended to facilitate the movement of freight rail traffic between the Ports of Long Beach and Los Angeles and Downtown Los Angeles. There is no consideration of goods movement that would emanate from the Downtown Los Angeles terminus to outlying locations.

It can reasonably be expected that there will be significant increases in goods movement activity into outlying areas and specifically into and through the San Gabriel Valley. Such impacts are, as a minimum, secondary or cumulative impacts resulting from the Alameda Corridor project and are worthy of consideration as part of this environmental analysis.

(3) A Goods Movement Study by the Southern California Association Of Governments (SCAG) indicates that the increase in east-west freight trains may be on the order of 100-150 trains per day. Due to the high number of at-grade crossings in the San Gabriel Valley and the typical length and speed of freight trains, the amount of time that north-south traffic will be delayed on the two major freight routes in the Valley can be significant.

If this is the case, the potential impacts are very significant in terms of adverse air quality, worsened auto and truck congestion, noise, health safety, public safety and associated impacts. The San Gabriel Valley already suffers from poor air quality and various models predict major concerns about future mobility. Freight train blockages of major north-south streets will, in many of our cities, inhibit the delivery of emergency services such as police, fire and ambulance by delaying their access to victims and/or facilities. The exacerbation of these impacts as a direct result of implementation of the Alameda Corridor project should be examined at this time.

(3)

The San Gabriel Valley Council Of Governments requests that these impacts be identified and responded to as part of the DEIS on this project. It should be noted that the SGVCOG does not oppose the development of the Alameda Corridor, but rather seeks to assure that its potential impacts on the San Gabriel Valley are identified, analyzed, discussed and properly mitigated.

Please do not hesitate to contact either David Smith, SGVCOG Executive Director, or myself if we can provide further information on our concerns. We look forward to your response.

Very truly yours,

Steve Sizemore, Co-Chair
SGVCOG Planning Directors' Committee

ds

c: SGVCOG Governing Board Members
SGVCOG City Managers
SGVCOG Planning Directors' Committee Members
SGVCOG Transportation Committee Members
Mark Pisano, SCAG
Carl Morehouse, SCAG
Al Fuentes, SCAG
Franklin White, MTA
Phyllis Papen, ACTA
Area Congressional Representatives

San Gabriel Valley Council of Governments

(1) Secondary and cumulative effects associated with the Corridor are described in Section 4.8 of the EIS. Included in this section are identified potential regional effects related to air quality and energy (Section 4.8.3), noise and vibration (Section 4.8.4), land use (Section 4.8.5), transportation and circulation (Section 4.8.9), safety and security (Section 4.8.11), and economics (Section 4.8.14).

(2) Increases in future rail freight movements will be determined by economic conditions on both global and national scales. These increased freight rail movements will occur both within the study area of the Alameda Corridor and also in other areas to the north and east of the downtown rail yards, including the San Gabriel Valley. The relative share of these freight movements among the three railroads will be determined by market conditions and therefore the allocation of rail movements to the various main lines eastward of downtown Los Angeles cannot be known with certainty. However, it is clear that a general increase in freight rail movements eastward from Los Angeles will occur in the future.

The Alameda Corridor serves to accommodate the flow of freight rail movements into and out of the San Pedro Bay ports in such a way as to minimize the adverse effects of such movements in the area extending from the ports to the downtown Los Angeles. Beyond downtown Los Angeles to the east, the allocation of rail movements among the three railroads and among the railroad's various main lines will be determined by market conditions and individual decisions on the part of the railroads themselves. Recognizing that increased rail activity will continue to be a concern to Southern California into the foreseeable future, the Southern California Association of Governments (SCAG) is managing a study to determine the best way of moving rail traffic eastward through Southern California, including the potential for additional consolidated routes along one or more lines. The results of this effort, which will be concluded shortly, will determine future regional policy on this issue, and may result in future projects similar in concept to the Alameda Corridor.

(3) The SCAG study will address many of the problems noted in the comment. Depending upon the nature of the recommendations forthcoming from this study, specific mitigation measures could be identified for near term implementation. Please also see the response to comment 2, above.

SCAG
SOUTHERN CALIFORNIA
ASSOCIATION OF GOVERNMENTS
818 West Seventh Street,12th Floor • Los Angeles, California 90017-3435 □ (213) 236-1800 • FAX (213) 236-1825

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February 13, 1995

Mr. Ronald J. Kosinski, Chief
Environmental Branch
Caltrans District 7
120 S. Spring Street
Los Angeles, CA 90012

RE: **Comments on the Draft EIS/EIR for the Alameda Corridor Project**
SCAG No. I 9500033

Dear Mr. Kosinski:

Thank you for submitting the **Draft EIS/EIR for the Alameda Corridor Project** to SCAG for review and comment. As areawide clearinghouse for regionally significant projects, SCAG assists cities, counties and other agencies in reviewing projects and plans for consistency with regional plans.

The attached comments are meant as administrative staff comments to provide guidance for considering the proposed project within the context of our regional goals and policies which are based in part upon state and federal mandates, as noted herein. SCAG's policy level review will be initiated with the presentation of the project to the Standing Committee on Implementation (SCI) on March 2, 1995. If you have any questions about these comments, please contact Glenn Blossom (213) 236-1876. He will be contacting you to invite you to participate in the March SCI meeting.

Sincerely,

Eric H. Roth

ERIC H. ROTH
Manager, Intergovernmental Review

Stella Mendoza City of Brawley-President, Ed Edelman Los Angeles County-First Vice President, Dick Kelly City of Palmdale-Second Vice President, Gaddi Vasquez Orange County- Past President, • Richard Alarcon City of Los Angeles, Richard Alatorre City of Los Angeles, Robert Bartlett City of Monrovia, George Bass City of Bell, Ron Bates City of Los Alamitos, George Battey, Jr. City of Burbank, Hal Bernson City of Los Angeles, Walter Bowman City of Cypress, Marvin Braude City of Los Angeles, Susan Brooks City of Rancho Palos Verdes, Art Brown City of Buena Park, Yvonne Brathwaite-Burke Los Angeles County, Jim Busby, Jr. City of Victorville, Bob Buster Riverside County, Laura Chick City of Los Angeles, John Cox City of Newport Beach, Cynthia Crothers City of Moreno Valley, Hal Croyts City of Lomita, Richard Dixon City of Lake Forest, Doug Drummond City of Long Beach, Lillian Eaton City of Yucaipa, Joseph Esquivel City of Lakewood, John Ferraro City of Los Angeles, Karyn Foley City of Calabasas, John Flynn Ventura County, Ruth Galanter City of Los Angeles, Sandra Genis City of Costa Mesa, Jackie Goldberg City of Los Angeles, Candace Haggard City of San Clemente, Garland Hardeman City of Inglewood, Mike Hernandez City of Los Angeles, Nate Holden City of Los Angeles, Robert Jamison City of Artesia, Jeff Kellogg City of Long Beach, Abbe Land City of West Hollywood, John Longville City of Rialto, Ron Loveridge City of Riverside, John aula, Barbara Messina City of Alhambra, Judy Mikels City of Simi Valley, David Myers City of Palmdale, Kathryn Nack City of Pasadena, Bev Perry City of Brea, Gwenn Norton-P. , Ron Parks City of Temecula, Irv Pickler City of Anaheim, Michael Plisky City of Oxnard, Beatrice Proo City of Pico Rivera, Larry Rhinehart City of Montclair, Richard Riordan City Ridley-Thomas City of Los Angeles, Albert Robles City of South Gate, Sam Sharp Imperial County, Marcine Shaw City of Compton, Rudy Svorinich City of Los Angeles, Tom Sykes ... Tully-Payne City of Highland, Joel Wachs City of Los Angeles, Rita Walters City of Los Angeles, Judy Wright City of Claremont, Zev Yaroslavsky City of Los Angeles •

COMMENTS ON THE DRAFT EIS/EIR FOR THE ALAMEDA CORRIDOR PROJECT

BACKGROUND AND PROJECT DESCRIPTION

The Alameda Corridor is proposed as a consolidated railroad link between the Ports of Los Angeles and Long Beach and the regional and national rail systems. The Alameda Corridor project would be a 20-mile corridor centered along Alameda Street, extending from downtown Los Angeles to the Ports of Los Angeles and Long Beach, within which is proposed consolidation of freight railroad service to the Ports, such service currently provided by the Southern Pacific, Union Pacific, and Atchison, Topeka and Santa Fe railroads. The Alameda Corridor project has been developing over the past 13 years, beginning with the creation in 1981 of the Ports Advisory Committee by SCAG. Various planning activities undertaken by that committee eventually led to the formation of the Alameda Corridor Task Force in 1985, which in turn led to the creation of a joint powers organization called the Alameda Corridor Transportation Authority (ACTA) in 1989.

The completed facility would contain two main line railroad tracks and a maintenance access road within a depressed trainway extending from downtown Los Angeles to the vicinity of State Route 91 (SR 91) and within an at-grade trainway from SR 91 southerly. Accompanying this would be one at-grade railroad drill track located adjacent to the consolidated trainway.

Also proposed as part of the project would be the reconstruction of existing Alameda Street, which currently consists of a two-way four-lane roadway west of the proposed trainway and a discontinuous two-way two-lane frontage road east of the proposed trainway. Signalization improvements would be provided throughout the corridor and left turn pockets would be provided at selected locations.

In addition to the proposed project, the No Build alternative is examined in the Draft EIS.

PURPOSE OF THE PROJECT

The purpose of the project, as officially adopted by the ACTA governing board, is:

> *To facilitate access to the ports through the year 2020 while mitigating potentially adverse impacts of the ports' growth, including highway traffic congestion, air pollution, vehicle delays at grade crossings, and noise in residential areas.*

SCAG SOUTHERN CALIFORNIA ASSOCIATION OF GOVERNMENTS
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CONSISTENCY WITH REGIONAL COMPREHENSIVE PLAN AND GUIDE POLICIES

As described in the Draft EIS, the proposed Alameda Corridor project is consistent with the Regional Comprehensive Plan and Guide (RCPG), as approved by SCAG's governing body, the Regional Council, in 1994.

The Regional Mobility Chapter (RMC) of the RCPG[1] explicitly supports the implementation of the Alameda Corridor access projects, as did the 1989 Regional Transportation Plan. This chapter links the goal of sustaining mobility with the goals of fostering economic development, enhancing the environment, reducing energy consumption, promoting transportation-friendly development patterns, and encouraging fair and equitable access to residents affected by socio-economic, geographic and commercial limitations.

The Regional Action Program of the RMC identifies the construction of the Alameda Corridor as the single largest facility and operations improvement in the RCPG. It is further declared that the project is "the most important single transportation improvement in the State; it has statewide and national significance; and the consequences of inadequate funding to implement the project would have disastrous economic consequences".[2]

The RMC policies that are pertinent to this project are listed in italics and discussed in the following paragraphs:

- *Growth in the demand for goods movement will be accommodated through provision of adequate multi-modal and intermodal infrastructure that is consistent with overall regional goals, objectives, and policies.*

  SCAG staff comments: The Draft EIS states that a total of 99 million metric tons of cargo moved through the Ports of Los Angeles and Long Beach in 1991. The Ports are projecting that total cargo handling at their facilities will expand at an average rate of slightly more than 3 percent per year from the present until the year 2010, and then by about 3.75 percent per year from 2010 until 2020. By the year 2020, the ports are projected to be handling approximately 210 million metric tons per year of cargo.

  The Draft EIS explains that utilization of the existing unimproved railroad corridors will result in impairment of rail and street traffic flow and increased noise and air pollutant

[1] See Endnote.

[2] RMC Volume 2, page 7-20.

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emissions. If railroad service can be consolidated, and if an appropriate corridor can be found, the movement of goods could be enhanced and exposure of people to noise, emissions and traffic delays could be greatly reduced.

The infrastructure represented by this project is the type of infrastructure called for by this regional policy.

- *Demand for increased goods movement will be given consideration as a means to address growth in cargo volumes.*

  SCAG staff comments: The Alameda Corridor project would appear to be appropriately aligned with this policy objective.

- *The ports and major air carrier airports in the SCAG region are regionally significant and important trade links with the remainder of the world and shall be supported as a major foundation of the regional economy.*

  SCAG staff comments: There is no question but that the proposed project would support the planned expansion of the Los Angeles and Long Beach Ports.

- *The potential for adverse impacts to mode shares, diversion of business to other ports and loss of cost-competitiveness in goods movement to, from and through the SCAG region will be considered in the development and implementation of local and regional plans.*

  SCAG staff comments: The implementation of the Alameda Corridor project would help to reduce the potential for adverse impacts to mode shares, reduce the potential for diversion of business to other ports and reduce the potential for loss of cost-competitiveness in goods movement that could more likely occur in the absence of the proposed project.

The Growth Management Chapter (GMC) of the RCPG also contains several policies that are particularly applicable to this project[3]. The following lists selected growth management policies of the GMC in italics followed by SCAG staff comments regarding the consistency of the project with those policies:

[3] See Endnote.

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- *The timing, financing, and location of public facilities, utility systems, and transportation systems shall be used by SCAG to implement the region's growth policies.*

  SCAG staff comments: There is ample evidence in the Draft EIR/EIR and in the RCPG to demonstrate that implementation of the project would be consistent with and contributory to the furtherance of the region's growth policies.

- *Encourage subregions to define an economic strategy to maintain the economic vitality of the subregion, including the development and use of marketing programs, and other economic incentives, which support attainment of subregional goals and policies.*

  SCAG staff comments: The RMC of the RCPG indicates that completion of the Alameda Corridor could form a core objective that solidifies the region's actions to help create jobs, to maintain trade links and to enhance the competitiveness of the region and the state.

  It is estimated in the Draft EIS that cumulative benefits from expanded economic activity at the ports by 2020 as a result of the project would include 700,000 local jobs, $69.4 billion in annual output in Southern California, $2.2 billion annually in state and local taxes, $11.3 billion annually in federal income and business taxes, and $5.2 billion annually in customs receipts.

  This project constitutes a fundamental component of an economic strategy that is fully embraced by the Southeast Los Angeles County, South Bay Cities and the City of Los Angeles subregions.

- *Encourage planned development in locations least likely to cause environmental impact.*

  SCAG staff comments: The Draft EIS/EIR for the project indicates that the proposed project would have substantial or potentially substantial effects with regard to seismicity, vibration, acquisition and displacement, public services and construction impacts. Beneficial long-term effects are expected with regard to air quality, noise, energy, transportation and circulation, public services, safety and security, aesthetics and economics.

- *Encourage mitigation measures that reduce noise in certain locations, measures aimed at preservation of biological and ecological resources, measures that would reduce exposure to seismic hazards, minimize earthquake damage and to develop emergency response and recovery plans.*

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SCAG staff comments: The environmental documentation for the project contains thorough analyses of the impact of the project on the environment and presents a full slate of mitigation measures which appear to be adequate to protect the affected resources, provided such measures are adopted as conditions of project approval.

CONFORMITY DETERMINATION

SCAG staff takes note of Appendix F of the Draft EIS which contains reproductions of two items of correspondence involving SCAG's conformity determination. The first is a letter from Peter C. Markle, Acting Administrator of the California Division of Region Nine, Federal Highway Administration. Mr. Markle had written to Mark Pisano, Executive Director of SCAG, on August 29, 1994 enclosing excerpts about air quality from a pre-circulation copy of the Draft EIS for the Alameda Corridor project, and requesting a determination of conformity from SCAG. This is followed by a response from SCAG signed by Arnold I. Sherwood, dated September 22, 1994. Mr Sherwood's letter provides assurance to the Federal Highway Administration that the Alameda Corridor is a conforming project in compliance with §93.103(c)(1)(i), §93.121, and §93.131 of the transportation conformity regulations. In that correspondence, SCAG also recommended to the Federal Highway Administration that it also find that the Alameda Corridor conforms with the Federal Clean Air Act.

Mr. Sherwood's letter of September 22, 1994 also states that the Alameda Corridor is included in the 1994 Regional Transportation Plan (RTP) and its eligible component projects are also included in the FY 1993-1999 Regional Transportation Improvement Program Amendment (RTIP). The RTP, the RTIP, and associated conformity reports were approved by the Federal Highway Administration and the Federal Transit Administration on November 10, 1994 for the South Coast Air Basin portion of the SCAG region. The Alameda Corridor is located entirely within the South Coast Air Basin.

CONCLUSION

The proposed Alameda Corridor project was originated as a direct result of SCAG's earlier plans and is fully supported by the current Regional Comprehensive Plan and Guide. The implementation of this project is vital to the region's future growth.

All mitigation measures associated with the project should be monitored in accordance with AB 3180 requirements.

- - -

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ENDNOTE

SOUTHERN CALIFORNIA ASSOCIATION OF GOVERNMENTS

Roles and Authorities

SCAG is a ***Joint Powers Agency*** established under California Government Code Section 6502 et seq. Under federal and state law, SCAG is designated as a Council of Governments (COG), a Regional Transportation Planning Agency (RTPA), and a Metropolitan Planning Organization (MPO). SCAG's mandated roles and responsibilities include the following:

SCAG is designated by the federal government as the Region's ***Metropolitan Planning Organization*** and mandated to maintain a continuing, cooperative, and comprehensive transportation planning process resulting in a Regional Transportation Plan and a Regional Transportation Improvement Program pursuant to 23 U.S.C. §134(g)-(h), 49 U.S.C. §1607(f)-(g) et seq., 23 C.F.R. §450, and 49 C.F.R. §613. SCAG is also the designated ***Regional Transportation Planning Agency***, and as such is responsible for both preparation of the Regional Transportation Plan (RTP) and Regional Transportation Improvement Program (RTIP) under California Government Code Section 65080.

SCAG is responsible for developing the demographic projections and the integrated land use, housing, employment, and transportation programs, measures, and strategies portions of the ***South Coast Air Quality Management Plan***, pursuant to California Health and Safety Code Section 40460(b)-(c). SCAG is also designated under 42 U.S.C. §7504(a) as a ***Co-Lead Agency*** for air quality planning for the Central Coast and Southeast Desert Air Basin District.

SCAG is responsible under the Federal Clean Air Act for determining ***Conformity*** of Projects, Plans and Programs to the Air Plan, pursuant to 42 U.S.C. §7506.

Pursuant to California Government Code Section 65089.2, SCAG is responsible for ***reviewing all Congestion Management Plans (CMPs) for consistency with regional transportation plans*** required by Section 65080 of the Government Code. SCAG must also evaluate the consistency and compatibility of such programs within the region.

SCAG is the authorized regional agency for ***Inter-Governmental Review*** of Programs proposed for federal financial assistance and direct development activities, pursuant to Presidential Executive Order 12,372 (replacing A-95 Review).

SCAG reviews, pursuant to Public Resources Code Sections 21083 and 21087, ***Environmental Impact Reports*** of projects of regional significance for consistency with regional plans [California Environmental Quality Act Guidelines Sections 15206 and 15125(b)].

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Pursuant to 33 U.S.C. §1288(a)(2) (Section 208 of the Federal Water Pollution Control Act), SCAG is the authorized ***Areawide Waste Treatment Management Planning Agency***.

SCAG is responsible for preparation of the ***Regional Housing Needs Assessment***, pursuant to California Government Code Section 65584(a).

SCAG is responsible (with the San Diego Association of Governments and the Santa Barbara County/Cities Area Planning Council) for preparing the ***Southern California Hazardous Waste Management Plan*** pursuant to California Health and Safety Code Section 25135.3.

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Southern California Association of Governments (SCAG)

SCAG's support for the project is appreciated. The various statements regarding the project's consistency with and support for the region's plans are acknowledged for the record.

SOUTHERN CALIFORNIA ASSOCIATION OF GOVERNMENTS

818 West Seventh Street,12th Floor • Los Angeles, California 90017-3435 □ (213) 236-1800 • FAX (213) 236-1825

March 7, 1995

Mr. Ronald J. Kosinski, Chief
Environmental Branch
Caltrans District 7
120 S. Spring Street
Los Angeles, CA 90012

RE: **Comments by the Standing Committee on Implementation on the Draft EIS/EIR for the Alameda Corridor Project - SCAG No. I 9500033**

Dear Mr. Kosinski:

At the March 2, 1995 meeting of SCAG's Standing Committee on Implementation (SCI), Caltrans' request for comments on the **Draft EIS/EIR for the Alameda Corridor Project** was considered. After reviewing a report prepared by SCAG staff, the SCI directed staff to advise the U.S. Department of Transportation Federal Highway Administration, Federal Railroad Administration and the California Department of Transportation that:

(1) The proposed Alameda Corridor project is consistent with the adopted Regional Comprehensive Plan and Guide, and

(2) The implementation of this project is vital to the region's future growth.

A copy of the SCAG staff report to the SCI is enclosed for your information. Thank you for your cooperation in the review of this project.

Sincerely,

Eric H. Roth

ERIC H. ROTH
Manager, Intergovernmental Review

Stella Mendoza City of Brawley-President, **Ed Edelman** Los Angeles County-First Vice President, **Dick Kelly** City of Palmdale-Second Vice President, **Gaddi Vasquez** Orange County- Past President, **Richard Alarcon** City of Los Angeles, **Richard Alatorre** City of Los Angeles, **Robert Bartlett** City of Monrovia, **George Bass** City of Bell, **Ron Bates** City of Los Alamitos, **George Battey, Jr.** City of Burb: **Hal Bernson** City of Los Angeles, **Walter Bowman** City of Cypress, **Marvin Braude** City of Los Angeles, **Susan Brooks** City of Rancho Palos Verdes, **Art Brown** City of Buena Park, **Yvonne Brathwa. Burke** Los Angeles County, **Jim Busby, Jr.** City of Victorville, **Bob Buster** Riverside County, **Laura Chick** City of Los Angeles, **John Cox** City of Newport Beach, **Cynthia Crothers** City of Moreno Valley, **Hal Croyts** City of Lomita, **Richard Dixon** City of Lake Forest, **Doug Drummond** City of Long Beach. **Lillian Eaton** City of Yucaipa, **Joseph Esquivel** City of Lakewood, **John Ferraro** City of Los Angeles, **Karyn Foley** City of Calabasas, **John Flynn** Ventura County, **Ruth Galanter** City of Los / City of Costa Mesa, **Jackie Goldberg** City of Los Angeles, **Candace Haggard** City of San Clemente, **Garland Hardeman** City of Inglewood, **Mike Hernandez** City of Los Angeles, N ngeles, **Robert Jamison** City of Artesia, **Jeff Kellogg** City of Long Beach, **Abbe Land** City of West Hollywood, **John Longville** City of Rialto, **Ron Loveridge** City of Riverside, **John** aula, **Barbara Messina** City of Alhambra, **Judy Mikels** City of Simi Valley, **David Myers** City of Palmdale, **Kathryn Nack** City of Pasadena, **Bev Perry** City of Brea, **Gwenn Norton-** , **Ron Parks** City of Temecula, **Irv Pickler** City of Anaheim, **Michael Plisky** City of Oxnard, **Beatrice Proo** City of Pico Rivera, **Larry Rhinehart** City of Montclair, **Richard Riordan** City of Los Angeles, **Mark Ridley-Thomas** City of Los Angeles, **Albert Robles** City of South Gate, **Sam Sharp** Imperial County, **Marcine Shaw** City of Compton, **Rudy Svorinich** City of Los Angeles, **Tom Sykes** City of Walnut, **Laurie Tully-Payne** City of Highland, **Joel Wachs** City of Los Angeles, **Rita Walters** City of Los Angeles, **Judy Wright** City of Claremont, **Zev Yaroslavsky** City of Los Angeles •

MEMORANDUM

To: Standing Committee on Implementation (SCI)

From: Glenn F. Blossom, IGR Analyst, (213) 236-1876

RE: **Alameda Corridor Project - SCAG No. I 9500033**

Date: March 2, 1995

==========

Project Description

The Alameda Corridor is proposed as a consolidated freight railroad link between the Ports of Los Angeles and Long Beach and the regional and national rail systems that terminate 20 miles to the north near the Los Angeles downtown area. Freight rail service is currently provided along separate routes by the Southern Pacific, Union Pacific, and Atchison, Topeka and Santa Fe railroads. The Alameda Corridor project has been developing over the past 13 years, beginning in 1981 with the creation of a Ports Advisory Committee by SCAG. Various planning activities undertaken by that committee eventually led to the formation of the Alameda Corridor Task Force in 1985, which in turn led to the creation of a joint powers organization called the Alameda Corridor Transportation Authority (ACTA) in 1989.

The completed facility would contain two main line railroad tracks and a maintenance access road within a depressed trainway northerly of State Route 91 (SR 91) and at-grade southerly of the SR 91. Accompanying this would be one at-grade railroad drill track located adjacent to the consolidated trainway.

Also proposed as part of the project would be the reconstruction of existing Alameda Street, which currently consists of a two-way four-lane roadway west of the proposed trainway and a discontinuous two-way two-lane frontage road east of the proposed trainway. Signalization improvements would be provided throughout the corridor and left turn pockets would be provided at selected locations.

Purpose of the Project

The purpose of the project, as officially adopted by the ACTA governing board, is:

> *To facilitate access to the ports through the year 2020 while mitigating potentially adverse impacts of the ports' growth, including highway traffic congestion, air pollution, vehicle delays at grade crossings, and noise in residential areas.*

Key Issue

o Would the project be consistent with the Regional Mobility and Growth Management chapters of the Regional Comprehensive Plan and Guide?

Staff Analysis

As described in the Draft EIS, the proposed Alameda Corridor project is consistent with the Regional Comprehensive Plan and Guide (RCPG).

The 1994 Regional Mobility Chapter (RMC) of the RCPG explicitly supports the implementation of the Alameda Corridor project, as did the 1989 Regional Transportation Plan. This chapter links the goal of sustaining mobility with the goals of fostering economic development, enhancing the environment, and reducing energy consumption.

The Regional Action Program of the RMC identifies the construction of the Alameda Corridor as the single largest facility and operations improvement in the RCPG. It is further declared that the project is "the most important single transportation improvement in the State; it has statewide and national significance; and the consequences of inadequate funding to implement the project would have disastrous economic consequences".

A number of RMC policies that are pertinent to this project are listed in italics and discussed in the following paragraphs:

- *Growth in the demand for goods movement will be accommodated through provision of adequate multi-modal and intermodal infrastructure that is consistent with overall regional goals, objectives, and policies.*

  SCAG staff comments: The Draft EIS states that a total of 99 million metric tons of cargo moved through the Ports of Los Angeles and Long Beach in 1991. The Ports are projecting that total cargo handling at their facilities will expand at an average rate of slightly more than 3 percent per year from the present until the year 2010, and then by about 3.75 percent per year from 2010 until 2020. By the year 2020, the ports are projected to be handling approximately 210 million metric tons of cargo per year.

  The Draft EIS explains that utilization of the existing unimproved railroad corridors will result in impairment of rail and street traffic flow and increased noise and air pollutant emissions. If railroad service can be consolidated, and if an appropriate corridor can be found, the movement of goods could be enhanced and exposure of people to noise, emissions and traffic delays could be greatly reduced.

  The infrastructure represented by this project is the type of infrastructure called

for by this regional policy.

- *Demand for increased goods movement will be given consideration as a means to address growth in cargo volumes.*

  SCAG staff comments: The Alameda Corridor project would appear to be appropriately aligned with this policy objective.

- *The ports and major air carrier airports in the SCAG region are regionally significant and important trade links with the remainder of the world and shall be supported as a major foundation of the regional economy.*

  SCAG staff comments: There is no question but that the proposed project would support the planned expansion of the Los Angeles and Long Beach Ports.

- *The potential for adverse impacts to mode shares, diversion of business to other ports and loss of cost-competitiveness in goods movement to, from and through the SCAG region will be considered in the development and implementation of local and regional plans.*

  SCAG staff comments: The implementation of the Alameda Corridor project would help to reduce the potential for adverse impacts to mode shares, reduce the potential for diversion of business to other ports and reduce the potential for loss of cost-competitiveness in goods movement that could more likely occur in the absence of the proposed project.

The 1994 Growth Management Chapter (GMC) of the RCPG also contains a number of policies that are particularly applicable to this project. The following lists selected growth management policies of the GMC in italics followed by SCAG staff comments regarding the consistency of the project with those policies:

- *The timing, financing, and location of public facilities, utility systems, and transportation systems shall be used by SCAG to implement the region's growth policies.*

  SCAG staff comments: There is ample evidence in the Draft EIS and in the RCPG to demonstrate that implementation of the project would be consistent with and contributory to the furtherance of the region's growth policies.

- *Encourage subregions to define an economic strategy to maintain the economic vitality of the subregion, including the development and use of marketing programs, and other economic incentives, which support attainment of subregional goals and policies.*

  SCAG staff comments: The RMC indicates that completion of the Alameda Corridor could form a core objective that solidifies the region's actions to help

create jobs, to maintain trade links and to enhance the competitiveness of the region and the state.

It is estimated in the Draft EIS that cumulative benefits from expanded economic activity at the ports by 2020 as a result of the project would include 700,000 local jobs, $69.4 billion in annual output in Southern California, $2.2 billion annually in state and local taxes, $11.3 billion annually in federal income and business taxes, and $5.2 billion annually in customs receipts.

This project constitutes a fundamental component of an economic strategy that is fully embraced by the Southeast Los Angeles County, South Bay Cities and the City of Los Angeles subregions.

- *Encourage planned development in locations least likely to cause environmental impact.*

  SCAG staff comments: The Draft EIS for the project indicates that the proposed project would have substantial or potentially substantial effects with regard to seismicity, vibration, acquisition and displacement, public services and construction impacts. Beneficial long-term effects are expected with regard to air quality, noise, energy, transportation and circulation, public services, safety and security, aesthetics and economics.

- *Encourage mitigation measures that reduce noise in certain locations, measures aimed at preservation of biological and ecological resources, measures that would reduce exposure to seismic hazards, minimize earthquake damage and to develop emergency response and recovery plans.*

  SCAG staff comments: The environmental documentation for the project contains thorough analyses of the impact of the project on the environment and presents a full slate of mitigation measures which appear to be adequate to protect the affected resources, provided such measures are adopted as conditions of project approval.

Conclusions and Recommendation

An analysis of the proposed project demonstrates that it has been formulated in close cooperation with regional plans, especially the Regional Mobility Element, and with State and federal environmental quality laws and regulations.

Therefore, it is recommended that the SCI advise the Federal Highway Administration, Federal Railroad Administration and California Department of Transportation that:

(1) The proposed Alameda Corridor project is consistent with the adopted Regional Comprehensive Plan and Guide, and

(2) The implementation of this project is vital to the region's future growth.

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SCAG

SCAG's support for the project is appreciated and acknowledged for the record.

COUNTY OF LOS ANGELES

DEPARTMENT OF PUBLIC WORKS

900 SOUTH FREMONT AVENUE
ALHAMBRA, CALIFORNIA 91803-1331
Telephone: (818) 458-5100

HARRY W. STONE, Director

ADDRESS ALL CORRESPONDENCE TO:
P.O.BOX 1460
ALHAMBRA, CALIFORNIA 91802-1460

RECEIVED
MAR 20 1995
ENV. PLAN. BR.

March 14, 1995

IN REPLY PLEASE REFER TO FILE: P-5

Mr. Ronald Kosinski
Interim District Division Chief
Caltrans District 7
120 South Spring Street
Los Angeles, CA 90012

Dear Mr. Kosinski:

RESPONSE TO A DRAFT ENVIRONMENTAL IMPACT STATEMENT (DEIS)
ALAMEDA CORRIDOR PROJECT

Thank you for the opportunity to provide comments on the DEIS for the proposed Alameda Corridor Project. We have reviewed the DEIS and offer the following comments:

Waste Management

The proposed report must address measures the project proponent will implement to mitigate the impact of construction and demolition waste generation. These measures may include programs to divert the construction and demolition waste from the landfills. (1)

The existing hazardous waste management (HWM) facilities in this county are inadequate to handle the hazardous waste currently being generated. The proposed project may generate hazardous waste which could adversely impact existing HWM facilities. This issue should be addressed and mitigation measures provided. (2)

The project site may contain active, abandoned or idle oil gas wells. The Los Angeles County Building Code, Section 308(d), requires that buildings and enclosed structures located within 200 feet from oil or gas wells be provided with methane gas protection systems. (3)

If you have any questions regarding these comments, please contact Mr. Mohammed Farzan of our Waste Management Division at (818) 458-2196.

Traffic/Circulation

Based on the traffic consultant's model results, we generally agree with the report that the proposed project would improve traffic circulation and increase safety along the Alameda Corridor.

The proposed grade separation of the railroad from surface streets will reduce congestion and improve traffic flow in the area and reduce potential train-auto accidents.

The report states that the project will have an adverse impact on the traffic circulation on the adjacent streets along the Alameda Corridor during the construction period. A construction management plan for the Alameda Corridor project is proposed as a mitigation measure to identify ways to minimize traffic disruption during construction. Detailed construction and detour plans should be provided to this Department for review and approval prior to the issuance of any encroachment or construction permits within the jurisdiction of the County of Los Angeles. (4)

As part of the project, Alameda Street will be reconstructed from its present configuration to provide additional left-turn pockets at appropriate locations. Also, signal improvements will be made in conjunction with the proposed street overpasses. Detailed striping and signal plans should be submitted to our Division for our review. (5)

The report indicates that Laurel Park Road will be closed west of Alameda Street and a new connection to Alameda Street will be made north of its existing location. We suggest that the second sentence of paragraph 3 of page 2-40 be revised to read: "An alternative means of access may be provided to connect with Alameda Street". We are currently conducting a traffic impact study of the area traffic circulation for the proposed street modifications. (6)

An evaluation of the future traffic conditions for the Years 2010 and 2020 is addressed in the DEIS. The traffic condition for the Year 2010 is based on projecting existing traffic volumes and assuming the planned roadway improvements listed in Table 6 of this document have been constructed. The traffic volumes for the Year 2020 were calculated by applying growth factors to the Year 2010 volumes. We believe, in order to fully assess the traffic conditions in these horizon years and to ensure adequate transportation circulation, the cumulative traffic including the traffic generated by this project and other planned developments along the Alameda Corridor should also be analyzed. The LOS analysis should be conducted for this cumulative condition for all roads and intersections within the jurisdiction of the County of Los Angeles and be submitted to this Department for review and approval. (7)

The report also indicates that the design goal criteria for the project is to implement roadway and signal improvements such that the volume to capacity (v/c) ratios for the Year 2020 are reduced to below 0.9 or within 0.02 of the "No Build" condition v/c ratio. According to the current County of Los Angeles Traffic/Access Guidelines (copy enclosed), v/c ratio of 0.85 is the point beyond which mitigation measures are required. If the intersection operates at or above 0.85 with existing traffic conditions an increase of v/c of 0.01 with the traffic generated by this project or cumulative traffic requires mitigation measures. (8)

Also, Page 2-40 Paragraph 3: Change second sentence to read: "An alternative means of access may be provided to connect with Alameda Street". (9)

If you have any questions regarding these comments, please contact Mr. Hector Rodriguez of our Traffic & Lighting Division at (818) 458-5909.

If you have any questions regarding the environmental reviewing process of this Department, please contact Ms. Clarice Nash at the previous page address or at (818) 458-4334.

Very truly yours,

HARRY W. STONE
Director of Public Works

BRIAN T. SASAKI
Assistant Deputy Director
Planning Division

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Los Angeles County Department of Public Works

(1) The DEIS addresses proposed recycling of construction materials to maximize reuse of materials and minimize waste volumes where practical. Clean materials can be reused or used for fill materials necessary for the project as practical.

(2) If sites are disturbed by corridor construction that are found to contain contaminated soil or groundwater, the sites would be cleaned prior to or during construction in accordance with all applicable regulations and guidelines governing the removal and disposal of hazardous materials.

(3) The comment is acknowledged. No known active, abandoned or idle oil wells are located within the corridor construction area. No buildings or enclosed structures are expected to be constructed within 200 feet of any oil or gas wells.

(4) The comment is acknowledged. Construction traffic management plans will be reviewed with appropriate agencies and jurisdictions.

(5) The comment is acknowledged. Detailed plans will be developed during the final design for review with appropriate agencies.

(6) The comment is acknowledged. The requested revision has been made.

(7) The traffic conditions and trip generation data for the year 2010 were obtained from SCAG and are compatible with the regional model. 2020 data are not available from SCAG and therefore a linear extrapolation method was used to forecast 2020 data. The model network was updated to reflect all funded and committed transportation projects in the region known at the time of the study. The project is a mitigation for expected delays resulting from increased trains going to and from the ports and does not generate trips or congestion in and of itself. The basis for analysis of impacts was to compare the project against the "no-project" alternative. Since the project goes through several jurisdictions, a consistent method of analysis was selected and presented to the Alameda Corridor Technical Working Group which includes representatives of Los Angeles County Public Works. The analysis methodology and threshold criteria were subsequently adopted by the Technical Working Group.

(8) See response to comment 7.

(9) The comment is acknowledged. The text of the noted paragraph will be appropriately modified.

COUNTY OF LOS ANGELES

FIRE DEPARTMENT

1320 NORTH EASTERN AVENUE
LOS ANGELES, CALIFORNIA 90063-3294

(213) 881-2481

P. MICHAEL FREEMAN
FIRE CHIEF
FORESTER & FIRE WARDEN

March 21, 1995

Mr. Ronald Kosinski
Interim District Division Chief
Caltrans, District 7
120 South Spring Street
Los Angeles, California 90012

Dear Mr. Kosinski:

SUBJECT: DRAFT ENVIRONMENTAL IMPACT REPORT – ALAMEDA CORRIDOR PROJECT (EIR #223, 1995)

PLANNING DIVISION

We are currently reevaluating the impacts this project will have on our service. We will make our concerns known in the near future and hope to resolve any issues with a representative of the ACTA Governing Board. We would therefore like to reserve the right to respond more fully at a subsequent date.

FORESTRY DIVISION

We have reviewed the Draft Environmental Impact Report for the Alameda Corridor Project. The areas germane to the statutory responsibilities of the Forestry Division have been addressed.

If you have any additional questions, please contact this office at the phone number shown above.

Very truly yours,

PAUL H. RIPPENS, CHIEF, FORESTRY DIVISION
PREVENTION BUREAU

PHR:jmb

SERVING THE UNINCORPORATED AREAS OF LOS ANGELES COUNTY AND THE CITIES OF:

AGOURA HILLS	CALABASAS	GLENDORA	LAKEWOOD	MAYWOOD	RANCHO PALOS VERDES	SOUTH EL MONTE
ARTESIA	CARSON	HAWAIIAN GARDENS	LA M	RWALK	ROLLING HILLS	SOUTH GATE
AZUSA	CERRITOS	HIDDEN HILLS	LANC	MDALE	ROLLING HILLS ESTATES	TEMPLE CITY
BALDWIN PARK	CLAREMONT	HUNTINGTON PARK	LA PL	OS VERDES ESTATES	ROSEMEAD	WALNUT
BELL	COMMERCE	INDUSTRY	LAWNDALE	PARAMOUNT	SAN DIMAS	WEST HOLLYWOOD
BELLFLOWER	CUDAHY	IRWINDALE	LOMITA	PICO RIVERA	SANTA CLARITA	WESTLAKE VILLAGE
BELL GARDENS	DIAMOND BAR	LA CANADA FLINTRIDGE	MALIBU	POMONA	SIGNAL HILL	WHITTIER
BRADBURY	DUARTE					

Los Angeles County Fire Department

The position of the Fire Department is noted.

Los Angeles County
Metropolitan
Transportation
Authority

818 West Seventh Street
Suite 300
Los Angeles, CA
Mailing Address:
Box 194
Los Angeles, CA
90053

213.623-1194

RECEIVED
MAR 14 1995
ENV. PLAN

March 13, 1995

Mr. Ronald Kosinski
Interim District Division Chief
Caltrans, District 7
120 South Spring Street
Los Angeles, Ca. 90012

Subject: Draft Environmental Impact Statement (EIS) for the Alameda Corridor

Dear Mr. Kosinski:

Thank you for forwarding the above-referenced Draft EIS. The MTA has reviewed the document and has the following comments:

- The EIS should address the potential for the proposed project to increase freight traffic in other areas of Los Angeles County, such as the San Gabriel Valley and North County. The Final EIS should more closely evaluate potential impacts and appropriate mitigation measures, and consider the appropriate phasing of additional freight consolidation projects in Los Angeles County. (1)

  We understand that the Southern California Association of Governments (SCAG) will be funding a freight consolidation study for the San Gabriel Valley in 1996. This should be referenced in the document.

- We understand that twenty-eight arterial grade separations are proposed as part of the project, and that this is consistent with the alternatives analyzed in the previous environmental impact report. With these grade separations and intersection improvements, the traffic impact analysis indicates that the project will mitigate or improve traffic congestion levels at all major arterial crossings along the corridor. We further understand that the project will not eliminate existing street crossings that would increase traffic on other streets. If there are changes to the identified grade separations, they will need to be evaluated for traffic impacts in a supplemental environmental assessment. (2)

- Construction activities are expected to result in localized traffic impacts, as well as necessitate bus rerouting and stop relocations, for potentially extended periods. The MTA should be involved in the preparation of construction and traffic management plans to ensure that traffic disruptions are minimized, and that maintenance of transit services to affected areas is adequately addressed. (3)

- The MTA further requests that formal notification be provided of any construction and street closures that may affect transit operations at least 90 days prior to start-up, to allow for adequate time for service adjustments and notice to the public. (3)

- While we understand that the EIS is intended to identify environmental impacts of the project, the MTA remains committed to ensuring the cost-effectiveness of the project's various components. We look forward to working with the Alameda Corridor Transportation Authority with respect to the funding and scheduling of project implementation.

Thank you for the opportunity to submit these comments. If you have any questions, please contact Kendra Morries, Land Use Manager at (213) 244-6579. For your future reference regarding coordination with MTA transit operations, please contact Jon Hillmer, Operations Planning Manager, at (213) 972-6972. The Final EIS and related environmental notices should be directed to Ms. Morries.

Sincerely,

Judith A. Wilson

JUDITH A. WILSON
EXECUTIVE OFFICER, PLANNING AND PROGRAMMING

JAW/EKS/KM

Los Angeles County Metropolitan Transportation Authority

(1) Please see the response to the San Gabriel Valley Council of Governments.

(2) The comment is noted. Any changes to the grade separations from those that are proposed under the locally preferred alternative will be analyzed for potential adverse effects. If necessary, an appropriate environmental clearance document will be prepared.

(3) See response to LAUSD comment 2. An important element of the traffic management plans for the corridor will be the maintenance of existing transit and the consideration of additional transit service as a mitigation for local traffic impacts during construction. These items will be coordinated with MTA representatives during the development of the traffic management plans. These plans will also require the notification of affected transportation agencies as well as the traveling public to minimize traffic delays and impacts associated with construction.

WASTEWATER RECLAMATION
SOLID WASTE MANAGEMENT

COUNTY SANITATION DISTRICTS
OF LOS ANGELES COUNTY

1955 Workman Mill Road, Whittier, CA 90601-1400
Mailing Address: P.O. Box 4998, Whittier, CA 90607-4998
Telephone: (310) 699-7411, FAX: (310) 695-6139

CHARLES W. CARRY
Chief Engineer and General Manager

March 9, 1995

File No: 01-00.04-00
08-00.04-00
23-00.04-00

Mr. Ronald Kosinski
Interim District Division Chief
Caltrans District 7
120 S. Spring Street
Los Angeles, CA 90012

RECEIVED
MAR 14 1995
ENV. PLAN. BR.

Dear Mr. Kosinski:

Alameda Corridor

The County Sanitation Districts received a *Draft Environmental Impact Report* for the subject project on March 8, 1995. We offer the following comment regarding sewerage service:

- The proposed project will impact several existing and/or proposed Districts' trunk sewers over which it will be constructed. Existing and proposed Districts' trunk sewers are located directly under and/or cross directly beneath the proposed project alignment. The Districts cannot issue a detailed response to or permit construction of the proposed project until project plans and specifications which incorporate Districts' sewer lines are submitted. In order to prepare these plans, you will need to submit a map of the proposed project alignment, when available, to the attention of Calvin Jin of the Districts' Sewer Design Section at the address shown above. The Districts will then provide you with the plans for all Districts' facilities which will be impacted by the proposed project. Then, when revised plans which incorporate our sewers have been prepared, please submit copies of the same for our review and comment.

If you have any questions, please contact the undersigned at (310) 699-7411, extension 2717.

Very truly yours,

Charles W. Carry

Marie L. Pagenkopp
Engineering Technician
Financial Planning &
Property Management Section

MLP:eg

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Los Angeles County Sanitation Districts

During later design stages of the project, the relocation of any Sanitation District facilities would be coordinated with the District to ensure that the relocation plans are acceptable. Detailed plans and specifications will be provided to the District for review and use in the permitting process.

Los Angeles Unified School District

SIDNEY A. THOMPSON
Superintendent of Schools

Facilities Asset Management Division

BOB NICCUM
Director of Real Estate and Asset Management

Environmental Review File
Alameda Corridor

March 13, 1995

Ronald J. Kosinski
Environmental Branch Chief
Caltrans, District 7
120 So. Spring Street
Los Angeles, CA 90012

Dear Mr. Kosinski:

Re: Alameda Corridor

Thank you for the opportunity to provide comments on the Environmental Impact Statement (EIS) for the Alameda Corridor project. During the scoping process, the District provided input on those school issues which had not been adequately addressed in the Environmental Impact Report. In response to our comments, you state on page E-3, Appendix E, that the "project sponsors believe the LAUSD has adequately been accommodated through the proposed mitigation measures." We strongly disagree with that assertion.

The mitigation to address school impacts provides no assurance that the project will not place an undue burden on the District. Several measures reference future consultations and plans without providing performance standards to be met. Where specific actions are set forth, the effects of these measures are weakened by the inclusion of such language as "where feasible," "wherever possible," "within practicable limits." In those cases contingent measures are not given. Statements such as these do not qualify as mitigation measures and should not be listed as such.

Unfortunately, the school issues which we raised are either not covered in the EIS or the discussion on these issues is woefully inadequate. The issues which are still outstanding and must be properly addressed before the project goes forward are discussed below:

GROUNDBORNE VIBRATION

Our request that groundborne vibration be addressed in the EIS is dismissed with the statement that "no substantial groundborne vibration effects on schools are anticipated." Reference is made to Appendix E, page E-4.

According to the discussion on page 4-45 of the document, "substantial" is used to mean actual damage to our structures. While we do not foresee that the effects of groundborne vibration will cause physical damage at our schools, this project impact must be considered "substantial" for our schools to the extent that the groundborne vibration disrupts the educational process.

1

BUSINESS SERVICES CENTER: 1425 S. San Pedro St., Room 101, Los Angeles, CA • MAILING ADDRESS: Box 2298, Los Angeles, CA 90051 • Telephone: (213)742-7581; FAX: (213)747-5443

Table S-1, page 36, contains two measures to address groundborne vibration during project construction. The first proposes that construction activities "be isolated from sensitive receptors *as much as possible"* (italics added). The second measure requires the "use of non-vibration techniques... *where feasible"* (italics added). The document does not propose contingent measures.

Where these measures are further defined in Section 4.7.4.1., the discussion is directed to reducing the effects of groundborne vibration on local residences. The use of such construction processes as pile driving is to be "prohibited" at distances less than 76 meters (250 feet) from residences..." There is no reference to schools.

This discussion goes on to propose that pile driving be restricted to weekdays during daytime hours. Reference is made to page 4-47. This measure would actually increase the likelihood that schools would be subject to the adverse effects of groundborne vibration.

The administrative record will show that the District has raised concerns about groundborne vibration throughout the review process for the EIR. Reference is made to comments on the DEIR and our subsequent correspondence of December 17, 1992 to the project proponent. (1)

Once again, we request that the following measures be adopted to address the issue of groundborne vibration during project construction:

- Ongoing, onsite monitoring for vibration be done during constriction at District schools within 400 feet of site construction
- Performance standards be set and approved by the District to insure that groundborne vibration does not interfere with the learning environment at our schools.

The potential problem of groundborne vibration when the project is operational has also not been addressed though we raised this issue in response to the Notice of Intention (NOI). We also once again request that a soil analysis be conducted for schools within 400 feet of the trainway to determine if these schools would be exposed to the effects of groundborne vibration.

If groundborne vibration is determined to be a problem during project construction or operation, effective mitigation must be provided to protect the integrity of the educational environment at these schools.

TRANSPORTATION AND CIRCULATION

Access to our school sites could be impaired for up to three years by construction activities according to the document. Reference is made in Table S-1, page 3-38. At issue are the safety of students en route to and from school, access for school buses and emergency vehicles, the drop-off and pick-up of students, evacuation routes, and the availability of on-street parking for District school buses, school visitors and staff. (2)

While we understand that impacts on circulation around our school sites cannot be fully known until project design has been completed, we submit that specific measures can and should be incorporated at this time to protect the safety of students and maintain access to our school sites.

These measures have been adopted for other public works projects and, we maintain, are feasible for this project.

Where measures cannot be fully defined, the reference to "construction management plans" to be developed must set measurable performance standards. (2)

The document must also show that the District be consulted and participate in the development of those plans. There is reference in Section 4.7.10.3. to consultation with fire and law enforcement officials, but not school officials. Please correct.

There is a reference under Section 4.7.10.3 to the providing of crossing guards "where necessary to ensure student safety." Please include that as a measure in Table S-1. Please confirm that the state guidelines contained in the "California DOT Traffic Manual, Chapter 10-07.3, Warrants for Adult Crossing Guards" will be used to determine when a crossing guard is warranted. Where the safety of students en route to school cannot be assured, we ask that the project proponent fund the busing of students during project construction. (3)

There is also a discussion on providing temporary walkways, and securing and shielding of construction sites near schools. Please include those measures in Table S-1. (4)

In the comments the LAUSD submitted on the NOI, we asked that construction vehicles, including the vehicles used to transport workers, be prohibited from parking on, or being staged along, the streets that border our school sites. There is no record in the document that those measures were considered. This prohibition has been adopted for other public works projects such as MTA Red Line Eastern Extension. We insist on the inclusion of this measure. (C)

HAULING OPERATION

The construction of the depressed railway will require the transport of substantial volumes of excavated material. In our response to the NOI, we asked that the environmental effects of this hauling operation be considered in the EIS. We could not find any discussion of this issue in the EIS.

If haul trucks are allowed to go past our school sites, there will be a further deterioration in air quality which already does not meet acceptable standards. Roadway reintrainment will raise the PM10 concentration levels, and exhaust emissions will increase the ambient concentrations of pollutants.

Trucks going past our school sites will cause an elevation in noise levels and create groundborne vibration which would disrupt the learning environment. Haul trucks will cause traffic hazards that could endanger the safety of students en route to and from school. School bus pick-up and drop-off schedules will be affected. (6)

Because the health of our students and the learning environment could be at risk, we specifically request that haul trucks not pass our schools in route to or from the construction site. Where that is not feasible, hauling must be confined to times when schools are not in session. This measure has been incorporated into other major public works projects such as the Rowena Reservoir.

AIR QUALITY

The comments of the District's Environmental Health and Safety Branch are contained in Attachment A, which is incorporated by reference in this response. Please address the issues which have been raised.

See Attachment

NOISE

During the scoping process, we asked that the expected elevation in noise levels at the schools in the vicinity of the project be addressed. The District noise standards were provided. As with other issues which we raised, the potential problem of noise pollution at our school sites has not been properly addressed in this document.

7

The comments of the District's Environmental Health and Safety Branch on project construction noise are contained in Attachment B, which is incorporated by reference in this response. Please address.

See Attachment

Once the project is operational, the concern is that noise levels at our sites along the corridor will be elevated by the expected increase in vehicular traffic and train operations along the corridor. In addition, elevation in noise levels could be a problem where there is an increase in vehicular traffic past our school sites because of the reconfiguration of streets and the installation of overpasses along the corridor.

8

The use of sound insulation for buildings at two schools along the corridor is shown as a measure which "will be explored and implemented where practicable." Reference is made to Table S-1, page S-39. That table shows noise as a "potentially substantial" residual impact for our school sites.

9

This project must not go forward unless mitigation is provided to insure noise levels at our schools will not exceed District standards during project construction and operation. Such measures as air conditioning and sound insulation of classrooms, installation of sound walls, and enclosure of outdoor eating areas at our school sites must be provided where the project will cause an elevation in noise levels.

10

In addition, baseline measures must be taken at all our schools along the project corridor. Monitoring must then be conducted during project construction and build-out, and measures put in place to immediately address disruptions to the learning environment for even temporary noise generating activities.

11

SUMMATION

Under the Environmental Justice section of the document there is reference on page S.30 to the project area having a substantial proportion of low income and minority families and a dominance of industrial land uses.

In this setting, where students are already at a disadvantage and the environment is already impacted, it is essential that the integrity of the learning environment be preserved and the health of our students not be put in further jeopardy.

The issues we have raised throughout the environmental review process for this project must be properly addressed and the project must not go forward until there is assurance that our students and the learning environment will not be at risk.

If we can provide any additional information, please contact me at (213) 742-7581.

Very truly yours,

Joan Friedman
Environmental Review Unit

JF:ldf

Attachments

c: Mr. Furutani
Ms. Castro
Mr. Thompson
Mr. Prescott
Mr. Koch
Ms. Scholl
Dr. Crum
Ms. Wong
Mr. Tomiyama
Ms. Takaki
Ms. Gray
Ms. Molitoris
Mr. Farrel

INTER-OFFICE CORRESPONDENCE
LOS ANGELES UNIFIED SCHOOL DISTRICT

Attachment A

TO: Joan Friedman, Realty Agent
Real Estate and Asset Management Branch

Date
March 10, 1995

FROM: Bill Piazza
Environmental Health and Safety Branch

SUBJECT: Alameda Corridor Draft Environmental Impact Statement

In response to your request to provide comments for the above referenced project, the following is provided.

Upon examination of the air quality element and its determination of PM10 emissions associated with the proposed project, the predicted concentration of 139 micrograms per cubic meter (ug/m3) is viewed as significant and nothing less than alarming. It is unfortunate that the applicant fails to realize that this concentration was generated assuming employment of appropriate mitigation. Prior to mitigation, the concentration predicted by the modeling exercise was 277 ug/m3.

Although the mitigated value is below the federal standard of 150 ug/m3, it is in exceedance of the California Ambient Air Quality Standard (CAAQS) of 50 ug/m3. It is anticipated therefore, that the proposed project will promote the continued degradation of ambient air quality in proximity of our adjacent schools and adversely affect the health of our students and staff. This condition is unacceptable and necessitates appropriate mitigation. Unless the applicant can quantify through the application of revised emission estimates and associated dispersion modeling that additional mitigation measures will reduce the predicted ground level concentration of 139 ug/m3 to a level below the CAAQS, the applicant must provide effective offsite controls to minimize PM10 deposition and loading at our schools and associated infiltration within occupied building structures. (12)

We invite the applicant to discuss our approach to develop an effective dust control and mitigation workplan. We are available to provide assistance at their earliest convenience.

Please advise as to the disposition of this memorandum and subsequent response by the applicant. I can be reached at (213) 742-7371.

BP:bp

FORM 34-AEH-3 (STK. NO. 815901) Rev. 6/87

INTER-OFFICE CORRESPONDENCE
LOS ANGELES UNIFIED SCHOOL DISTRICT

ATTACHMENT B

TO: Joan Friedman, Realty Agent
Real Estate and Asset Management Branch

Date March 13, 1995

FROM: Sharon Thomas
Environmental Health and Safety Branch

SUBJECT: ALAMEDA CORRIDOR - EIS

Per your request, I have reviewed the environmental documents related to the above referenced project. Comments regarding potential noise impacts related to the "locally preferred alternative" are provided below.

The EIS states that LAUSD schools are not expected to be "substantially affected by project generated noise." However, no documentation is provided to substantiate this claim for Alternative 2.1B. In fact, there seems to be conflicting information as to whether schools will be impacted by construction noise. (13)

If the potential exists for schools to be impacted by noise during the construction phase, effective mitigation (e.g., noise barriers) should be provided so that LAUSD noise guidelines (previously provided) are not exceeded. In addition, section 4.7.3.6, Construction Impacts and Mitigation Measures, should be amended to require the contractor to minimize construction activities during school hours where construction noise may impact nearby schools. Compliance with local noise ordinances is not an effective mitigation for schools since it provides no protection from excessive noise levels during the hours that schools are in session. (14)

If you should have any questions regarding the above information, please call me at 7371.

ST:st

FORM 34-AEH-3 (STK. NO. 815901) Rev. 6/87

Los Angeles Unified School District

(1) The assessment of ground-borne vibration is discussed in Section 4.5 of the FEIR and summarized in Section 4.7.4 of the DEIS. The criteria for assessing ground-borne vibration are detailed in Section 4.5.2 of the FEIR. The criteria are based on the thresholds for annoyance, not building damage, as implied in the comment. The projected levels of ground-borne vibration are well below the threshold for damage.

Concerning ground-borne vibration caused by construction, procedures for minimizing ground-borne vibration are listed in Section 4.7.4.1 of the EIS. These procedures should apply to all sensitive locations including residences, schools, and other institutional buildings. The comment correctly identifies that limiting pile driving to weekday, daytime periods may increase the likelihood that schools would be subject to the adverse effects of ground-borne vibration. In areas near schools and away from residences, nighttime and weekend periods are preferable for pile driving. In project areas where pile driving will be required and where there are both residences and schools, further coordination will be required to determine the least intrusive time for pile driving.

The comment raises the issue of ground-borne vibration from train operations, and requests that soil analyses be conducted for schools within 400 feet of the proposed alignment. No vibration impact has been identified for schools in the LAUSD based on the annoyance criteria. Since no vibration impacts are expected, there is no reason to conduct additional analysis such as soil investigation. However, it should also be noted that the relationship between vibration transmission and soil condition is extremely complex and difficult to assess. Predictions of vibration based on soil conditions are not highly reliable.

(2) As a part of the final design, detailed traffic management plans and emergency response plans will be developed in coordination with representatives from local traffic and transportation agencies, fire and law enforcement officials, school districts and other affected parties. Maintenance of school access, by both pedestrians and vehicles, and emergency vehicle routes will be specifically addressed. Construction contractors will be required to comply with approved traffic management plans. The traffic management plans will also include a plan for agency notifications and information dissemination to the public prior to beginning construction activities.

(3) See response to LAUSD comment 2. The safety of children in proximity to construction would be of paramount concern during the construction period. Crossing guards for elementary schools, where found to be necessary, will be provided by the project in the immediate vicinity of the affected school during the construction period. School bus service is the responsibility of LAUSD.

(4) Table S-1 will be appropriately modified.

(5) During the construction of the proposed project, all reasonable efforts will be made to restrict construction activities, including the parking of construction vehicles in close proximity to schools.

(6) Construction related emissions, including emissions associated with hauling, were discussed in the EIR and are repeated in the EIS. Mitigation measures associated with hauling are identified in Table 4-9. It is understood that LAUSD schools may be in proximity to construction activities associated with this and other projects. All practical efforts will be made to provide the LAUSD with adequate protection from adverse construction effects, including the preparation of traffic management plans.

(7) The procedures used for the noise analysis do not directly follow the LAUSD guidelines, but do result in defining noise impact for the same locations. In fact, the noise impact criteria used in this study result in a more conservative assessment of impact than the LAUSD noise standards that allow a daytime L_{eq} of up to 67 dBA without mitigation.

(8) The project will cause an increase in noise levels at a number of locations along the alignment. However, no noise impact from train operations is projected for LAUSD schools as a result of the project.

(9) The comment correctly identifies that under the Public Services - Effects to Schools section of Table S-1 of the DEIS, the table states that noise increases are projected for two schools. Noise impact from train operations is projected for Exceptional Adult Educational Center, but is not projected for any LAUSD schools.

(10) The noise impact criteria used for the proposed project would provide an equivalent level of protection as those prescribed by the LAUSD. No adverse impacts on LAUSD schools are expected.

(11) Noise impact documentation and mitigation procedures will be implemented in accordance with the environmental analysis presented to date. To the extent that LAUSD schools are identified as receptors requiring special care, that care will be extended.

(12) See also the response to comment 5 above.

The California standard is exceeded approximately half the time in the location of the proposed project. Mitigation measures to be implemented during construction (Table 4-9 of the EIS) will not reduce background concentrations. However, during operation, the proposed project is expected to reduce PM_{10} emissions (as shown on Table 4-3 in the EIS) thereby improving regional air quality. Impacts from construction activities are temporary.

(13) The FEIR documents the noise analysis for Alternative 2.1A. As summarized in Table 4-42 of the FEIR, no noise impact from train operations is projected for schools in the LAUSD for Alternative 2.1A, with the exception of the Ritter School. As discussed in Section 4-1 of the EIS, the environmental impacts associated with Alternative 2.1B are

similar to or less than those for Alternative 2.1A. The primary difference between the two is that Alternative 2.1B does not involve widening Alameda Street. As a result of this difference, future noise levels projected for the Ritter School are lower for Alternative 2.1B than Alternative 2.1A, and no noise impact is projected from train operations for this location under Alternative 2.1B.

Concerning construction noise, as stated in Section 4.7.3.6 of the EIS, the project has the potential of creating substantial noise intrusion to communities along the corridor during the construction period. Thus, potential substantial noise impact from construction is projected for the residences and institutional buildings along the corridor.

(14) The comment recommends that noise barriers be used for mitigation during construction. Also, the comment recommends that contractors should minimize construction activities during school hours where noise impact is a possibility. Where applicable these steps will be considered for minimizing construction noise impact in addition to the procedures listed in Section 4.7.3.6 of the DEIS.

City of Alhambra
Office of the Mayor and City Council

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March 10, 1995

Mr. Ronald Kosinski
Interim District Division Chief
CalTrans, District 7
120 South Spring Street
Los Angeles, CA 90012

Gateway to the San Gabriel Valley

111 South First Street Alhambra California 91801

RE: Draft Environmental Impact Statement
Alameda Corridor Project

Dear Mr. Kosinski:

As a member of the San Gabriel Valley Council of Governments (SGVCOG), Alhambra would like to express some concerns about the impacts of the Alameda Corridor Project on the movement of goods throughout the San Gabriel Valley. These impacts are not currently addressed in the Draft Environmental Impact Statement for this project.

Specifically, we expect that the Alameda Corridor Project will increase the number of east-west trains in the San Gabriel Valley by 100 to 150 trains daily. Because of the high number of at-grade crossings in the San Gabriel Valley, this increase will create freight train blockages on many north-south arterials, worsening air pollution and traffic congestion and delaying emergency vehicles.

While neither Alhambra nor the SGVCOG opposes the Alameda Corridor Project, we do request that the potential impacts of the project on freight movement in the San Gabriel Valley be addressed in the project DEIS.

Thank you for your consideration.

Sincerely yours,

Boyd G. Condie

Boyd G. Condie
Councilmember

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City of Alhambra

Please see the response to the San Gabriel Valley Council of Governments.

City of Alhambra
Office of the City Manager

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March 21, 1995

Mr. Ronald Kosinski
Interim District Division Chief
CalTrans, District 7
120 South Spring Street
Los Angeles, CA 90012

RE: Draft Environmental Impact Statement
Alameda Corridor Project

Dear Mr. Kosinski,

The City of Alhambra appreciates the opportunity to present comments on the above-referenced environmental document.

The Alameda Corridor project has the potential to create significant environmental impacts on a regional basis. These potential impacts, other than air quality, are not identified or discussed in the Draft Environmental Impact Statement (DEIS). As a result, their significance cannot be evaluated at this time.

It is our understanding that the Alameda Corridor project is intended to facilitate the movement of freight rail traffic between the Ports of Long Beach and Los Angeles and Downtown Los Angeles. There is no consideration of goods movement that would emanate from the Downtown Los Angeles terminus to outlying locations.

It can reasonably be expected that there will be significant increases in goods movement activity into outlying areas; specifically into and through the San Gabriel Valley. Such impacts are, as a minimum, secondary or cumulative impacts resulting from the Alameda Corridor Project and are worthy of consideration as part of this environmental analysis.

A Goods Movement Study by the Southern California Association of Governments (SCAG) indicates that the increase in east-west freight trains may be on the order of 100-150 trains per day. Due to the high number of at-grade crossings in the San Gabriel Valley and the typical length and speed of freight trains, the amount of time that north-south traffic will be delayed on the two major freight routes in the Valley can be significant.

Gateway to the San Gabriel Valley

111 South First Street Alhambra California 91801

818 570-5010

FAX 818-281-2248

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If this is the case, the potential impacts are very significant in terms of adverse air quality, worsened auto and truck congestion, noise, health safety, public safety and associated impacts. The San Gabriel Valley already suffers from poor air quality and various models predict major concerns about future mobility. Freight train blockages of major north-south streets will, in many of our cities, inhibit the delivery of emergency services such as police, fire, and ambulance by delaying their access to victims and/or facilities. The exacerbation of these impacts as a direct result of implementation of the Alameda Corridor project should be examined at this time, and should include review of possible mitigating measures such as grade separations at key intersections.

The City of Alhambra requests that these impacts be identified and responded to as part of the DEIS on this project. It should be noted that the SGVCOG does not oppose the development of the Alameda Corridor, but rather seeks to assure that its potential impacts on the San Gabriel Valley are identified, analyzed, discussed and properly mitigated.

Please do not hesitate to contact either myself or Christine Montan, Transportation and Air Quality Manager if we can provide further information regarding our concerns. We look forward to hearing from you.

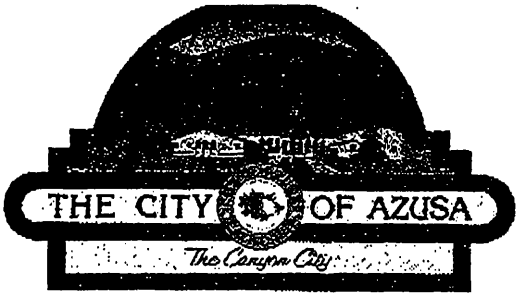
Sincerely,

Julio J. Fuentes
City Manager

CC: Christine Montan, Transportation and Air Quality Division Manager
Mike Martin, Planning Director

City of Alhambra (Boyd C. Condrie, Councilmember)

Please see the response to the San Gabriel Valley Council of Governments.



March 13, 1995

Mr. Ronald Kosinski
Interim District Division Chief
CalTrans, District 7
120 South Spring Street
Los Angeles, California 90012

Dear Mr. Kosinski:

The City of Azusa appreciates the opportunity to present comments on the Draft Environmental Impact Statement (DEIS) for the Alameda Corridor Project. This project has the potential to create significant environmental impacts on a regional basis, as well as specific impacts on the City of Azusa. These potential impacts, other than air quality, are not identified or discussed in the DEIS. As a result, their significance cannot be evaluated at this time.

It is our understanding that the Alameda Corridor project is intended to facilitate the movement of freight rail traffic between the Ports of Long Beach and Los Angeles and Downtown Los Angeles. There is no consideration of goods movement that would emanate from the Downtown Los Angeles terminus to outlying locations.

It can reasonably be expected that there will be significant increases in goods movement activity into the outlying areas and specifically through the City of Azusa. Such impacts are, at a minimum, secondary or cumulative impacts resulting from the Alameda Corridor project and are worthy of consideration as part of this environmental analysis.

A Goods Movement Study by the Southern California Association of Governments (SCAG) indicates that the increase in east-west trains may be on the order of 100-150 trains per day. Many of theses trains will likely utilize the existing MTA tracks (previously owned by the Atchison, Topeka and Santa Fe Railroad) which traverse Azusa. Due to the six (6) at-grade crossings this line makes in Azusa, and the typical length and speed of freight trains, the amount of time that north-south traffic will be delayed across Azusa by this freight route can be significant.

If this is the case, the potential impacts are very significant in terms of adverse air quality, worsened auto and truck congestion, noise, health safety, public safety and associated impacts. The City of Azusa already suffers from poor air quality and various models predict major concerns about future mobility. Freight train blockages of north-south streets will, in Azusa as well as other cities, inhibit the delivery of emergency services such as police, fire and ambulance by delaying their access to victims and/or facilities. The exacerbation of these impacts as a direct result of implementation of the Alameda Corridor project should be examined at this time.

The City of Azusa requests that these impacts be identified and responded to as part of the DEIS on this project. It should be noted that the City of Azusa does not oppose the development of the Alameda Corridor, but rather seeks to assure that its potential impacts on Azusa and the remainder of the San Gabriel Valley are identified, analyzed, discussed and properly mitigated.

Please do not hesitate to contact either Dan Watrous, Senior Planner, or myself if we can provide further information on our concerns. We look forward to your response.

Sincerely,

Roy E. Bruckner
Director of Community Development

c: San Gabriel Valley Council of Governments

City of Azusa

Please see the response to the San Gabriel Valley Council of Governments.

LAW OFFICES
BURKE, WILLIAMS & SORENSEN
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OUR FILE NO. 01047-007

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February 7, 1995

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To Gary Henderson	From Cathy Wright
Co.	Co. CT
Dept.	Phone # 897-0687
Fax #	Fax #

Mr. Ronald J. Kosinski
Environmental Branch Chief
Caltrans, District 7
120 South Spring Street
Los Angeles, CA 90012

Re: Alameda Corridor Project/Request for Extension of Public Comment

Dear Mr. Kosinski:

As discussed on the telephone, our firm represents the City of Compton with regard to this matter. I am writing to you on behalf of the City of Compton to request that the period for public comment and review for the Alameda Corridor Project Draft Environmental Impact Statement ("DEIS"), Report No. FHWA-CA-EIS-95-01-D, be extended for an additional 45 days to April 27, 1995.

As you are aware, the proposed Alameda Corridor Project will affect numerous communities and have many far-reaching social, economic and environmental impacts, the magnitude of which are reflected in the range and complexity of issues addressed in the environmental documentation for the project. These issues demand the fullest opportunity for public comment which can only occur if adequate time is given to the public to review and analyze such documentation, which in this instance consists of both the DEIS and the Environmental Impact Report ("EIR") prepared in January 1993--a total of over 1000 pages.

Moreover, as the DEIS itself acknowledges, the Alameda Corridor Project was first proposed in 1981 and preparation of the necessary environmental documentation began in early 1991. Thus, state and federal agencies responsible for the Alameda Corridor Project have had more than a decade to become familiar with the project and over four years to analyze its potential impacts, the efficacy of mitigation measures and the feasibility of

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alternatives. It is only fair therefore that the City of Compton and its citizens likewise be given an ample period of time to review the proposed Alameda Corridor Project and its supporting environmental documentation.

Given that the Alameda Corridor Project has been in the making for over 13 years, granting an extension of the comment period for 45 days clearly will have no adverse impact on the project. On the contrary, such an extension would provide the City of Compton and other interested parties an opportunity to make meaningful comments on the DEIS and, in turn, ensure that the design of the project is the result of informed and reasoned decisionmaking. Thus, I would urge you to carefully consider the City's request.

It is my understanding that you are the proper official to act on the City's request for an extension of the comment period. If this is not the case, I ask that you immediately forward this request to the proper official and inform us of such transmittal. Further, given the short period currently being extended for public comment, I would ask that a decision regarding the City's request for an extension be made early in the comment period. Finally, if the City's request is denied, please state the reason for the denial and provide the name and address for the proper official to whom an appeal of such denial should be submitted.

If you have any questions, please do not hesitate to contact me.

Very truly yours,

JOHN D. SCHLOTTERBECK
for BURKE, WILLIAMS & SORENSEN

cc: Mr. Glenn Clinton,
Chief, District Operations, Federal Highway Administration
Mr. William Gelston,
Chief, Economic Studies Division, Federal Railroad Administration
Mr. Gill V. Hicks,
General Manager, Alameda Corridor Transportation Authority
Reginald R. Tabor,
Special Assistant to the City Manager, City of Compton
Jeffrey Kightlinger, Esq.

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Burke, Williams & Sorensen (for City of Compton)

The comment period was extended for an additional 14 days to accommodate the City of Compton. The City of Compton's comments (a response to which are provided in this section) were received within the extended comment period.

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WRITER'S DIRECT DIAL:
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OUR FILE NO. 01047-007

February 15, 1995

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To Gary Letourneau	From Cathy Lehnert
Co.	Co.
Dept.	Phone #
Fax #	Fax #

CERTIFIED MAIL -
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Mr. Ronald J. Kosinski
Environmental Branch Chief
Caltrans, District 7
120 South Spring Street
Los Angeles, CA 90012

Re: Alameda Corridor Project/Request for Extension of Public Comment

Dear Mr. Kosinski:

By letter dated February 7, 1995, I requested on behalf of the City of Compton a 45-day extension of the public comment and review period for the Alameda Corridor Project Draft Environmental Impact Statement ("DEIS"), Report No. FHWA-CA-EIS-95-01-D. As noted in my letter, the proposed Alameda Corridor Project will affect numerous communities and have many far-reaching social, economic and environmental impacts, as reflected in the range and complexity of issues addressed in the DEIS. The request for an extension was made to enable the City of Compton and other interested parties to make meaningful comments on the DEIS and to ensure that the design of the project is the result of informed and reasoned decisionmaking.

On Thursday February 9, 1995, a meeting of the Governing Board of the Alameda Corridor Transportation Authority ("ACTA") was held at which the Board voted to fund additional studies pertaining to the feasibility of a covered depressed trainway and roadway alternative and additional mitigation measures for the project. These studies are to be completed within approximately 60 days, with a report on the status of such studies to be made to ACTA within 30 days. These studies will provide additional relevant information concerning the Alameda Corridor Project's impacts, mitigation measures, and alternatives and therefore are essential to the public's ability to make meaningful comments on the DEIS. Solicitation of public comments on the DEIS by the Federal Highway Administration

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("FHWA") and the Federal Railroad Administration ("FRA"), as joint lead agencies for this project, prior to completion of these studies could be premature and jeopardize the environmental review process.

Given this, the City is requesting that the public review and comment period on the DEIS for the proposed Alameda Corridor Project be extended until 45 days after these studies are completed. This will provide the City of Compton and other interested parties an opportunity to consider and comment on all information relevant to the Alameda Corridor Project and ensure that any decision made by the FHWA and FRA concerning the project is an informed one.

As before, it is my understanding that you are the proper official to act on the City's request for an extension of the comment period. If this is not the case, I ask that you immediately forward this request to the proper official and inform us of such transmittal. Further, given the short period of time currently remaining for public comment, I would ask that a decision regarding the City's request for an extension be made as soon as possible, preferably no later than one week from the date of this letter. Finally, if the City's request is denied, please state the reason for the denial and provide the name and address for the proper official to whom an appeal of such denial should be submitted.

If you have any questions, please do not hesitate to contact me.

Very truly yours,

JOHN D. SCHLOTTERBECK
for BURKE, WILLIAMS & SORENSEN

cc: Mr. Glenn Clinton,
Chief, District Operations, Federal Highway Administration
Mr. William Gelston,
Chief, Economic Studies Division, Federal Railroad Administration
Mr. Gill V. Hicks,
General Manager, Alameda Corridor Transportation Authority
Reginald R. Tabor,
Special Assistant to the City Manager, City of Compton
Jeffrey Kightlinger, Esq.

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Burke, Williams & Sorensen (for City of Compton)

See the response to the previous letter from Burke, Williams & Sorenson, above.

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March 13, 1995

VIA FACSIMILE AND
CERTIFIED MAIL--RETURN RECEIPT REQUESTED

Mr. Ronald J. Kosinski
Environmental Branch Chief
Caltrans, District 7
120 South Spring Street
Los Angeles, CA 90012

Re: Alameda Corridor Project/Third Request for Extension of Public Comment Period

Dear Ron:

I enjoyed meeting you at the public hearing on the Draft Environmental Impact Statement ("DEIS") for the Alameda Corridor Project and appreciated the opportunity to highlight some the City of Compton's concerns about the project. There were a couple of issues raised in our conversation, however, that I would like to address in more detail.

First, you stated that it was your understanding that while the Alameda Corridor Transportation Authority ("ACTA") had agreed to review existing information concerning the feasibility of the City's proposed covered and depressed roadway/railway alternative, ACTA had not agreed to conduct any new studies. As such an extension of the public comment period is not required.

Your understanding does not, I believe, accurately reflect the actions taken by the ACTA Governing Board at its meeting held on February 9, 1995. At that meeting, the City again expressed its concerns with the project and with ACTA's summary rejection of its proposed covered and depressed roadway/railway alternative. The City requested that the Governing Board take six specific actions, including conducting the necessary studies to fairly and adequately evaluate the City's proposed alternative. The Governing Board voted in favor of taking the requested actions and directed ACTA staff to report back to the

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Governing Board in thirty days regarding the status of the additional studies on the City's proposed alternative.

On Thursday March 9, 1995, Daniel, Mann, Johnson & Mendenhall ("DMJM"), the technical consultant retained by ACTA, presented a report to the ACTA Governing Board outlining the format for and the issues to be addressed in these additional studies. Included with this letter is a copy of DMJM's outline. As can be seen, DMJM is not merely re-examining existing information, but in fact is generating new information concerning the City's proposed alternative(s). Specifically, seven issues are to be addressed as part of DMJM's studies: right-of-way, air quality, noise and aesthetic impacts, design requirements for rail cover, utility relocations, project compatibility/phasing options and constructions impacts. None of these issues were previously addressed as part of the environmental review process.

The information being generated by DMJM is directly relevant to the Alameda Corridor Project. Moreover, as the public hearing on the DEIS aptly demonstrated, the City of Compton's comments on the Alameda Corridor Project will focus predominantly on the feasibility of potentially more suitable alternatives, including the proposed covered and depressed roadway/railway alternative. Compton is now in the difficult position of attempting to provide comments on alternatives that are currently being studied. When these DMJM studies become available on May 8, 1995, they will almost certainly impact the City's view of the project and provide new information that should be reviewed and commented upon. Thus I am renewing my request that the public review and comment period on the DEIS for the proposed Alameda Corridor Project be extended until **45 days after DMJM's studies are completed.**

Second, I want to address your statement that ACTA has indicated that it does not want to grant an extension. The Alameda Corridor Project is a regional project which has been in the making for over fourteen years. The requested extension represents only a brief delay and one which is more than justified given the project's many far-reaching environmental, social and economic impacts.

In addition, while the City understands and appreciates ACTA's desire to keep this project on schedule, this project is now in the federal environmental review stage. The Federal Railway Administration ("FRA"), the Federal Highway Administration ("FHA") and Caltrans, as FHA's agent, must act independently. Any decision to grant or deny an extension of the public comment period must be based on the National Environmental Policy Act, which not only encourages broad public involvement in the environmental review

process, but also demands that all relevant information be considered by lead agencies prior to making any decision concerning a project.

Ultimately, the decision whether to grant the City's requested extension rests with Caltrans and the Federal agencies. If the requested extension is granted, the City will be able to consider and comment on all information relevant to the Alameda Corridor Project, helping to ensure that any decision made by Caltrans, FHA and FRA concerning the project is an informed one. If the requested extension is denied, the City still will make comments on the project, to the best of its ability but under protest. Regardless, the City asks that a formal decision regarding its request for an extension of the public comment period be made by no later than **Wednesday March 15, 1995.**

The current deadline for comments on the DEIS is fast approaching and the FRA, FHA and Caltrans have had over a month to consider the City's request for an extension. The City of Compton needs to know now whether its request is granted or denied so that the City may structure its comments accordingly.

If you have any questions, please do not hesitate to contact me.

Very truly yours,

JOHN D. SCHLOTTERBECK
for BURKE, WILLIAMS & SORENSEN

JDS/rf
Enclosure
cc: Mr. Glenn Clinton,
Chief, District Operations, Federal Highway Administration
Mr. William Gelston,
Chief, Economic Studies Division, Federal Railroad Administration
Mr. Gill V. Hicks,
General Manager, Alameda Corridor Transportation Authority
Reginald R. Tabor,
Special Assistant to the City Manager, City of Compton
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Compton Truck Tunnel & Rail Cover Evaluation

Interim Progress Report

Alameda Corridor Transportation Authority

March, 9, 1995

Compton Proposal Description

- Exclusive Truck Tunnel
  - Greenleaf to Rosecrans
  - Four-lane configuration
- Covered Trainway
  - Alondra to Rosecrans
  - Full Cover - Indigo to Elm

History and Background

- Previous Studies
  - Exclusive Truck Expressway
  - Covered Expressway
- Technical Working Group
  - Reaffirmed Project Definition 1-13-93
  - Explore Options for Preserving CBD
  - Work with SCAG on Truck Study

Study Format

- Develop Concept
- Identify and Evaluate Issues
- Estimate Benefits and Costs

Project Issues

- Right-of-Way
- Air Quality - Mobile vs. Point Source
- Noise and Aesthetic Impacts
- Design Requirements for Rail Cover
- Utility Relocations
- Project Compatibility/Phasing Options
- Construction Impacts

** TOTAL PAGE.10 **

Next Steps

- Complete Studies
- Finalize Report
- Present Results to Board

Burke, Williams & Sorenson (for City of Compton)

An extension of time to comment for the City of Compton was previously granted for an additional 14 days. The latest request for further additional time has been denied.

COMPTON UNIFIED SCHOOL DISTRICT

OFFICE OF THE SUPERINTENDENT

THE COMPTON UNIFIED SCHOOL DISTRICT'S CONCERNS AND QUESTIONS REGARDING THE PROPOSED ALAMEDA CORRIDOR

Presented At

The Alameda Corridor Transit Authority
Public Hearing On
The Alameda Corridor

March 2, 1995

Bateman Hall
11331 Ernestine Avenue
Lynwood, CA 90262

Presented By

Dr. Harold L. Cebrun
Superintendent

Compton Unified School District
604 South Tamarind
Compton, CA 90220

COMPTON UNIFIED SCHOOL DISTRICT
OFFICE OF SUPERINTENDENT

The Compton Unified School Distict staff has reviewed the "Draft Environmental Impact Statement" and the City of Compton's Alameda Corridor Committee manual. The following includes some of the District's questions and concerns regarding the proposed Alameda Corridor.

EMERGENCY SERVICES

1. How will the construction and subsequent operation of the Corridor impact Compton's emergency services? Won't police and fire and paramedic services be seriously hampered by the hundreds of trains running along the Corridor?

2. Have any plans been identified for development to ensure that Compton's emergency services (police, fire and paramedics) have clear routes for travel in and around the corridor that will support quick response times?

3. What are the standards for emergency service response times? What agency establishes these standards? Have any studies been conducted to project whether Compton's emergency services response times will be lengthened and by how much?

4. How will the pursuit of persons committing crimes and attempting to escape on foot be compromised by the presence of the corridor?

PUBLIC SAFETY

5. What measures will be taken during the construction phase of the corridor to protect public safety?

6. Several schools in the Compton Unified School District are located in the immediate vicinity of the Corridor. Students from King Elementary, Jefferson Elementary, Bunche Middle School and Davis Middle School must cross Alameda to attend school. What measures will be taken to protect our school children from the following: wandering into the construction area and being injured by construction equipment, trains operating in the corridor or trains running on temporary shoe-flies?

7. Are any studies being conducted to project the potential for accidents between vehicles, particularly school buses, and trains at grade crossings?

8. What about the potential for accidents involving pedestrians, particularly school children, and exposure to injury or hazardous materials as a result of train accidents?

9. Are there any emergency response procedures under development to deal with potential accidents and exposure to hazardous materials, particularly as they relate to school children?

10. How are we dealing with the potential for train derailments and spills?

11. Are there any studies being conducted to estimate the risk to Compton residents, employees and the 26,000 students in the Compton Unified School District as a result of just one accident involving a chemical spill and/or derailment?

12. Specifically, what kind of hazardous materials and how much will be transported through the Corridor?

13. Will the public have any input as to what kinds of hazardous materials and how much and how frequently they will be transported through the Corridor?

14. How will incidents regarding Corridor/railway accidents and hazardous materials be reported to the Compton Community and officials of the school district?

15. It is our understanding that this project has the potential to expose users to seismic hazards and the susceptibility of the area to liquefaction during an earthquake may be high. Will these conditions pose a danger to Compton's school children?

ENVIRONMENT

16. How will both the construction and the operation of the Corridor impact our air quality?. What are our current air pollutant emission levels and what studies are being done to determine by how much these levels will be increased?

17. Are any medical studies being conducted to determine how school children will be impacted (both short-term and long-term) by an increase in air pollutant emission levels caused by the Corridor's operations?

18. It is our understanding that the construction and operation of the proposed Alameda Corridor project will increase levels of noise and vibration for areas adjacent to the corridor. It is also our understanding that measurements of existing and future noise and vibration will be conducted at a number of "sensitive" locations along the proposed alignment. Have the schools in the Compton Unified School

District (particularly those located along the proposed Corridor) been included among the "sensitive" locations where measurements will be conducted. Also, will such measurements include the impact of future noise and vibrations on school classrooms, the instruction process and the ability of students to hear, absorb and retain instruction as well as take examinations in an environment conducive to such testing?

19. It is our understanding that this project may require acquisition of private property for right-of-way purposes. Do acquisition plans include any properties of the Compton Unified School District. If specific plans have not yet been determined, when will they be determined?

20. It is our understanding that this project may require the closure of some streets that currently cross Alameda Street. At this time, has it been determined which streets are proposed for closure? When and how will this determination be made? How will the potential impact to schools and related bus transportation, particularly, in the Compton Unified School District be studied? What agency will conduct this study? How will any related recommendations be developed?

Compton Unified School District

(1) Emergency response should be improved significantly by the Alameda Corridor, because it will eliminate conflicts at existing grade crossings.

(2) Ensuring public safety will be a major requirement of all construction activities. An emergency response plan will be developed and implemented during construction in coordination with emergency service agencies to ensure that response access is not adversely affected by construction.

(3) Although no specific emergency response time studies have been conducted, the project should result in significant benefits by eliminating delays from train conflicts. See response to comment 1.

(4) Law enforcement officials in each of the Corridor cities were invited during the conceptual engineering effort to participate in discussions with project engineering staff regarding the potential law enforcement implications of the Corridor. Law enforcement officials noted potential problems of retrieving abandoned stolen objects and persons from the trench. Pursuit of persons committing crimes would not be adversely affected because the interior of the corridor would be highly visible from above and therefore there would be few places to hide. Secondly, since all existing grade crossings would be retained, and since both criminals and police alike would have access to such crossings, no change from existing conditions regarding police pursuit would occur.

(5) Ensuring public safety will be a major requirement of all construction activities. Construction documents will include specific requirements and identify responsibilities for public safety during construction. A Traffic Management Plan will be developed and implemented, in coordination with responsible local agencies, to ensure that traffic circulation and access are adequately and safely maintained during construction . Pedestrian safety will also be an important consideration in the development of construction plans and the traffic management plan.

(6) See response to Item 5. Access to dangerous construction areas will be restricted by temporary fencing, barricades or other means. Trains operating in the corridor during construction will be operated at low speeds in accordance with P.U.C. regulations and should therefore pose little risk to pedestrians.

(7) The project will eliminate grade crossings for through trains operating to the ports, thus virtually eliminating the possibility of accidents between trains and road vehicles. The at-grade drill track will be used for local service only. Therefore, the risk of vehicle-train accidents (including all vehicles, autos, trucks, buses, motorcycles) would be significantly reduced by the Alameda Corridor Project. Specific train-vehicle accident studies (including buses) have not been conducted.

(8) The potential for accidents involving pedestrians and school children, and exposure to hazardous materials resulting from train accidents is judged to be improved as compared

with existing conditions. Please see the EIS, Sections 4.5 and 4.7.11 for further information.

(9) An emergency response plan will be developed prior to operating the Corridor. This plan will govern how incidents of varying types are to be handled when they occur, and the proximity of schools will specifically be recognized. Please see Section 4.7.11 for further information.

(10) The potential for train derailments and spills would be improved, as compared with existing conditions. Please see Section 4.7.11 for further information.

(11) No risk assessment studies are being conducted regarding any specific locations or facilities. The Corridor will result in improved risk management capabilities. Please see Section 4.7.11 for further information.

(12) The types and amounts of hazardous materials carried by each railroad are determined by the railroads themselves. The Corridor will not affect either the types of materials or the amounts carried. Approximately 10 percent of rail cars currently traveling through the region carry materials classified as hazardous.

(13) The individual railroad companies make decisions regarding the transport of hazardous materials in compliance with ICC and FRA regulations. ACTA has no role in determining the transport of hazardous materials.

(14) Incidents will be reported to affected parties in accordance with the emergency response plan, which will be developed prior to initiating Corridor operations and in accordance with all applicable federal, state and local laws.

(15) The susceptibility of the area to seismic hazards will not be changed by the Corridor. Dangers associated with earthquakes (as they may affect schools) would be the same as they are at the present time and are unrelated to implementation of the Corridor.

(16) The construction and operational air quality effects associated with the Corridor are described in Section 4.2. The analysis conducted to date indicates that there will be elevated pollutant levels during project construction. During operation of the Corridor, locomotive and motor vehicle (autos and trucks) emissions will be reduced at the regional scale and carbon monoxide concentrations at the local scale will remain the same as if the Corridor had not been built.

(17) Analysis conducted to date indicates no increase in emissions associated with the Corridor which would affect school children, as compared with the No Build alternative; therefore no medical studies have been done.

(18) The comment applies to the selection of measurement locations. The 33 noise measurement locations are identified in Section 4.4.1 of the FEIR. Measurement locations were selected that were relatively close to the proposed alignment and

representative of other nearby noise and vibration-sensitive locations, including residences and schools. Existing and future noise and vibration levels were projected for all sensitive locations along the alignment, not just the 33 measurement locations. Of the schools in the Compton Unified School District, the Bunche Junior High School is the closest to the proposed alignment, which is approximately 0.36 mile from the proposed project alignment. No noise measurements were conducted at this location, although noise measurements were conducted nearby at the residence at 2608 127th Street.

(19) No acquisition is required from property under the ownership of the Compton Unified School District at the present time, as the project is presently defined.

(20) All existing grade crossings along Alameda Street will be converted to grade separations after the Corridor is completed, such grade separations being facilitated by means of at-grade bridges over the depressed trainway. Each crossing over the corridor will require closure at some time during the construction process, and these closures will be sequenced in accordance with overall construction planning for the project. Coordination with the Compton Unified School District will be conducted with sufficient advance notice to permit adequate planning on the part of the District.

COMPTON

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OMAR BRADLEY
Mayor

COUNCIL MEMBERS
RONALD J. GREEN, Dist. 1
MARCINE SHAW, Dist. 2
YVONNE ARCENEAUX, Dist. 3
JANE D. ROBBINS, Dist. 4

HOWARD CALDWELL
City Manager

February 7, 1995

Honorable Tom Jackson
Chairman, Alameda Corridor Transportation Authority
6550 Miles Avenue, No. 113
Huntington Park, California 90255

Re: Alameda Corridor Project/Rejection of Depressed Roadway Alternative

Dear Mr. Jackson:

It is my understanding that a meeting of the Governing Board of the Alameda Corridor Transportation Authority ("ACTA") has been scheduled for this Thursday, February 9, 1995, and that among the actions to be taken at this meeting is the formal rejection of a covered depressed trainway and roadway alternative for the Alameda Corridor Project. I am writing to you to express my extreme disappointment and disagreement with any such action and to urge ACTA to reconsider its decision to reject this alternative.

The Alameda Corridor Project has been in the making for nearly fourteen years now. Throughout this period, the City of Compton has been actively involved in the project, including participating on the Governing Board of ACTA, in an attempt to ensure that the numerous social, economic and environmental impacts associated with the project receive fair and adequate consideration. While supporting the general concept of a consolidated corridor for the transport of goods from the San Pedro Bay Ports to distribution points in the City of Los Angeles, the City repeatedly has raised legitimate concerns regarding the project's impacts and has suggested possible ways to mitigate these impacts.

All too often, however, the City's concerns and suggestions have been either totally ignored or dismissed out of hand by ACTA. A prime example of this is ACTA's treatment of the City's contention that a covered depressed trainway and roadway alternative should be studied as part of the project. Under this alternative, a depressed roadway and railway would be built with a cover, providing direct access to and from the San Pedro Bay Ports for trains, trucks and other cargo-carrying vehicles. This alternative would further many of the goals of the Alameda Corridor project and enhance the project's value by providing a truly

consolidated corridor between Los Angeles and the San Pedro Bay Ports. Moreover, it would prevent Alameda Street from becoming a thoroughfare for heavy commercial traffic, which is very likely to occur if the proposed project is built as planned.

Despite the obvious potential benefits of such an alternative, ACTA summarily rejected this potential alternative in response to the City's written comments on the Draft Environmental Impact Report for the project, the scoping comments for the Environmental Impact Statement and the City's resolution establishing said alternative. ACTA's purported rationale for doing so was that a covered depressed trainway and roadway alternative was "too costly". Yet ACTA came to this conclusion without the benefit of any studies, investigations or assessments analyzing the economic feasibility of such an alternative.

Under both the National Environmental Policy Act, 42 U.S.C. S 4321, et seq. ("NEPA") and the California Environmental Quality Act, Public Resources Code S 21000 et seq. ("CEQA"), the analysis of alternatives is considered "the heart" of the environmental review process. To this end, both NEPA and CEQA require that agencies consider a reasonable range of alternatives to a proposed project. This requires more than mere lip service, however. Agencies must "rigorously explore and objectively evaluate all reasonable alternatives", and " devote substantial treatment to each alternative considered in detail including the proposed action so that reviewers may evaluate their comparative merits". 40 C.F.R. S 1502.14; see also, Pub. Res. Code S 21002. ACTA's summary rejection of the covered depressed trainway and roadway alternative without the benefit of any data regarding its economic feasibility clearly violates both the spirit and the letter of NEPA and CEQA.

The Governing Board's formal rejection of this alternative on Thursday, February 9, 1995, will only serve to exacerbate this deficiency by putting an official imprimatur on a determination which had little basis in fact or in law. Thus, on behalf of the City of Compton, I once again urge ACTA to reconsider its decision to reject consideration of a covered depressed trainway and roadway alternative for the Alameda Corridor Project and ask that ACTA allocate the funds necessary to study the economic viability of this alternative. Only by conducting such a study can any decision to reject this alternative be said to be the result of rational, informed decisionmaking on the part of ACTA, as required under NEPA and CEQA.

Finally, I want to remind you that as a joint powers agency, ACTA's purpose is to address the needs and concerns of all of its

members. ACTA should demonstrate its commitment to this purpose by considering in earnest the covered depressed trainway and roadway alternative, particularly since the City of Compton and several other communities stand to be disproportionately impacted by the Alameda Corridor Project.

Therefore, it is my request, with the consensus of the Compton City Council, that the ACTA Board take the following actions:

1. Direct ACTA staff to prepare the necessary documents to include the covered depressed trainway and roadway as an alternative in the Environmental Impact Report and Environmental Impact Statement for the Alameda Corridor Project.

2. Prepare the appropriate studies to fairly analyze and evaluate the City's alternative.

3. Prepare the studies identified by the City of Compton in its comments to the Environmental Impact Report and scoping comments for the Environmental Impact Statement (see attached).

4. Establish a mitigation measure for addressing the increased freight train traffic on the Wilmington Branch (Willowbrook Avenue) during and after construction of the Alameda Corridor.

5. Prepare a plan to mitigate the potential adverse financial impacts of the Alameda Corridor on existing businesses and land uses.

6. Conduct a local circulation study to analyze and address the impact of the Alameda Corridor on traffic flow within the City of Compton.

If you have any questions or wish to discuss this matter further, please do not hesitate to contact me.

Sincerely,

OMAR BRADLEY
MAYOR OF THE CITY OF COMPTON

RESOLUTION NO. 17,777

A RESOLUTION OF THE CITY COUNCIL OF THE CITY OF COMPTON ENDORSING COVERED TRENCH PROPOSAL FOR THE ALAMEDA CORRIDOR PROJECT WITHIN THE CITY OF COMPTON.

WHEREAS, the current proposal for the Alameda Corridor Project, as drafted by the Alameda Corridor Transportation Authority (ACTA), to construct a depressed train-way below grade, and a four feet high brick wall topped by eight feet chain-link fencing along the corridor at grade, is an unacceptable alternative;

WHEREAS, the current proposal for the Alameda Corridor, as drafted by the ACTA, will serve to divide the City of Compton in two, resulting in visual dislocation of residents;

WHEREAS, the City of Compton is deeply concerned about the economic and social impact of the proposed Alameda Corridor project on the businesses and residents of the City;

WHEREAS, the City of Compton appointed the Compton Alameda Corridor Committee to review ACTA proposals and make findings and recommendations to the City Council regarding said proposals and their impact on the City;

WHEREAS, several members of the Compton Alameda Corridor Committee have developed a proposal for a covered trench to reduce the adverse impact of the Alameda Corridor Transportation Project on the economy of the City of Compton, and the quality of life of residents;

WHEREAS, the covered trench proposal will serve to unify the City and compliment the City's adopted Beautification Program.

NOW, THEREFORE, THE CITY COUNCIL OF THE CITY OF COMPTON DOES HEREBY RESOLVE AS FOLLOWS:

Section 1. That the City endorses the covered trench proposal developed by the Compton Alameda Corridor Committee, which includes a covered train-way and a covered truck-way and recognizes the covered trench proposal as the official position of the City with respect to the design of the Alameda Corridor Project.

Section 2. That City representatives will present and support the covered trench proposal before the Alameda Corridor Transportation Authority.

Section 3. That a certified copy of this resolution shall be forwarded to the Alameda Corridor Transportation Authority, and U.S. Representative Walter R. Tucker II.

Section 4. That copies of this Resolution shall be filed in the Offices of the City Manager, City Planner, City Attorney, and City Clerk.

RESOLUTION NO. 17,777
Page 2

Section 5. That the Mayor shall sign and the City Clerk shall attest to the adoption of this Resolution

ADOPTED this 27 day of September, 1994.

MAYOR OF THE CITY OF COMPTON

ATTEST:

CITY CLERK OF THE CITY OF COMPTON

CITY OF COMPTON INCORPORATED MAY A.D. 1888 CALIFORNIA

STATE OF CALIFORNIA
COUNTY OF LOS ANGELES
CITY OF COMPTON

I Charles Davis, City Clerk of the City of Compton, hereby certify that the foregoing resolution was adopted by the City Council, signed by the Mayor and attested by the City Clerk at a regular meeting thereof held on the 27 day of Septrember, 1994.

That said resolution was adopted by the following vote, to wit:

AYES: COUNCIL MEMBERS -Green,Shaw,Arceneaux,Robbins,Bradley
NOES: COUNCIL MEMBERS -None
ABSENT: COUNCIL MEMBERS -None

CITY CLERK OF THE CITY OF COMPTON

CITY OF COMPTON INCORPORATED MAY A.D. 1888 CALIFORNIA

Omar Bradley, Mayor, City of Compton

The Mayor's letter is not specifically a comment on the DEIS, since it was addressed to the ACTA Board Chairman as a request to that Board. Of the 6 points raised on page 3 of the letter, comments 4 through 6 are identical to other comments which were made by the City of Compton which were submitted as comments on the DEIS. A response to comments 1 through 3 of the Mayor's letter (which are addressed to the request for a covered tunnel) is provided below.

The City of Compton has requested that the Alameda Corridor Transportation Authority (ACTA) consider implementing a covered depressed trainway and accompanying truckway within its city limits, in the same corridor as the planned project.

A depressed truckway is not currently embodied in the alternatives discussed in this EIS. The reasons for this are as follows:

(1) A grade separated truck expressway (configured as an above-grade facility) was considered during the conceptual design work that was conducted prior to issuing the DEIR for the project (August, 1992), and was found to be unsatisfactory in terms of its high cost and adverse environmental effects. In particular, such a grade separated facility would have introduced substantial adverse visual and noise effects which were found unacceptable. And finally, it was determined that port-related truck travel was not of sufficient magnitude to warrant the truck expressway, due to the added travel distance and associated travel time that would occur. In addition, significant local traffic impacts would be associated with such an option, since locally destined travel would be faced with more circuitous routing than would otherwise be the case. Also, a substantial additional amount of right-of-way would have been required, which was also found to be unacceptable. For these reasons, a grade separated truck expressway was removed from further consideration prior to issuance of the DEIR in August, 1992. The ACTA Governing Board and its supporting committee structure, on which the City of Compton has membership, was apprised of this and concurred. The facility proposed by the City of Compton would be below grade, rather than the elevated facility considered during conceptual engineering. However, with the exception of visual and noise effects which would not be associated with a below grade facility, the remaining reasons for rejection would still accrue to the suggested facility.

(2) The alternatives which were examined in the DEIR led to a certified FEIR (January, 1993) and an identified "locally preferred alternative," which did not include any additional improvements, including grade separation either above or below grade, specifically intended to capture truck movements. The ACTA Governing Board unanimously adopted these actions. The City of Compton's representative on the ACTA Governing Board supported that vote.

(3) Subsequent to adoption of the locally preferred alternative and certification of the EIR under CEQA, during the course of preparing the DEIS, City of Compton representatives suggested inclusion of a covered depressed truckway. This suggestion was brought

before the ACTA Technical Working Group which resulted in a recommendation reaffirming the locally preferred alternative was forwarded to the ACTA Governing Board. The ACTA Governing Board formally rejected Compton's suggestion and reaffirmed its support for the locally preferred alternative, for the following reasons: (a) the truck expressway would not meet the goal of relieving congestion (from trucks) on parallel freeways (as demonstrated by modeling results), so overall trip time could not be significantly improved, (b) the expressway would have undesirable right-of-way and other effects (such as adverse right-of-way and localized air quality impacts), (c) truck traffic would increase congestion in Vernon and Los Angeles at the northern end of the Corridor, and (d) the expressway would be more costly than the other alternatives being considered. The action taken by the ACTA Governing Board also included the following items intended to address the City of Compton's concerns: (a) options should be explored to preserve the downtown business district in the City of Compton, and (b) ACTA should work with SCAG on its upcoming truck study (which is currently underway) to review options for solving truck problems in the area.

The range of alternatives which is included in the EIS represents a reasonable range of alternatives, based on the goals of the project and the need to consider environmental effects. Inclusion of the depressed truck expressway suggested by the City of Compton would not offer additional means of either addressing the goals of the project or reducing environmental effects caused by the project.

In its meeting of February, 1995, the ACTA Governing Board asked its staff to examine the Compton request and report back with a recommendation. The six points noted on page three of the Compton letter were noted in the direction to staff. The recommendation from staff, and the subsequent action by the ACTA Governing Board, are reported as follows.The findings of the additional study regarding the proposed covered Compton tunnel are reported in *Compton Truck Tunnel & Rail Cover Review* (April, 1995) which is provided as Appendix H to this EIS. The objectives of the study were to further define the proposed facility and develop the technical information with which to evaluate its efficacy.

Two alternatives were developed. Alternative 1 included a four-lane depressed truck bypass tunnel section with median entrance/exit at each end; the tunnel extended approximately 4,600 feet in length. This alternative also included covering the depressed trainway for a length of 7,000 feet with a full structural bridge section. The covered trainway and truck tunnel were separated by a continuous structural support wall. Alternative 2 was developed in an attempt to reduce overall right-of-way requirements by shifting the northbound lanes over onto an extended rail cover. This alternative would require extending the rail cover to a total length of 8,000 feet.

Technical information was developed for a variety of factors, as follows:

Construction Phasing: Construction of the truck tunnel bypass would require a construction sequence different from that which would be employed to construct the depressed trainway alone, the result of which would be to add a minimum of 12 months to the schedule for reaching

revenue operation of the Alameda Corridor and a minimum of two years to the overall construction schedule.

Right-of-Way Acquisition: Both alternative alignments for the truck tunnel would require additional right-of-way beyond that required for the Corridor alone. Alternative 1 would require approximately 50 additional parcels of private property; Alternative 2 would require approximately 20 additional parcels.

Ventilation Requirements: Positive ventilation would be required for the truck tunnel, with a capacity of 700,000 cubic feet per minute in order to maintain acceptable carbon monoxide levels. Three or four ventilation equipment buildings would be necessary and exhaust vents would be required at selected locations. The covered tunnel-with-ventilation requirements would be regarded as a point source by the South Coast Air Quality Management District, with attendant regulatory requirements that would not be associated with the depressed open trainway.

Noise & Aesthetics: The truck tunnel and covered rail section would reduce truck and rail generated noise and vibration, however truck and rail noise would be increased somewhat at the portals. The mechanical ventilation system would add to noise production. Aesthetic issues would accrue to the ventilation buildings and above ground vents.

Trench Access: Both the rail trench cover and truck tunnel would require the elimination or relocation of an access road that was proposed for the depressed open trainway. This would require additional right-of-way.

Fire & Life Safety: The truck tunnel and rail cover would need to include systems for operations, security, surveillance and emergency response. Life safety systems would also be required. Emergency responses within the tunnel would be more difficult than if it were not covered.

Operation & Maintenance: The truck tunnel and rail cover would impose additional operation and maintenance requirements for the mechanical ventilation systems, security and surveillance systems and tunnel lighting.

Traffic Projections: Approximately 7,500 vehicles per hour would be expected to be attracted to the truck tunnel and rail cover facility, of which about 240 trucks per hour would be expected to use the truck bypass facility. This would compare with 2,000 vehicles and 60 trucks per hour at the present time. Intersection level of service at Compton and Alondra Boulevards would be improved somewhat.

Costs: Alternative 1 would cost an estimated additional $270 million to construct, including approximately $26.5 million for right-of-way. Alternative 2 would cost an estimated $260 million, including right-of-way. It was estimated that the cost to construct a rail cover only would be approximately $90 million.

Additional Alternatives: Recognizing the high cost of the alternatives that had been developed, the City of Compton requested that another option be described which would fulfill the City's

objectives at lesser cost. The requested alternative would include a complete cover from Palmer Street to Laurel Street (about 1,600 feet) or from Elm to Myrrh Street (about 3,000 feet), together with urban design treatment all other crossings. An approximate estimated cost of $25 to $40 million was associated with this option.

The above information was presented to the ACTA Governing Board at its May, 1995 meeting.

Each of the three railroads serving the ports (Southern Pacific, Union Pacific, Santa Fe) have reviewed the Compton proposal and the information contained in the *Compton Truck Tunnel & Rail Cover Review.* Their comments are as follows:

Union Pacific Railroad (UPRR; contained in a letter, dated June 1, 1995)

UPRR strongly opposes the tunnel concept in Compton or at any other location on the Alameda Corridor. The tunnel would create serious operational and safety problems, as follows:

- Diesel exhaust gases trapped inside the tunnel could reach dangerous levels unless a high powered ventilation system is installed.

- Train crews and maintenance workers would need special and ongoing training and special equipment (such as respirators) in order to be able to respond to an incident in the tunnel, and the cost of such equipment and training would be considerable.

- Derailment cleanup would be more hazardous and costly inside the tunnel because the use of overhead cranes would be precluded.

- A derailment involving hazardous materials could be much more serious in the tunnel. This would be especially true if explosive or flammable cargo were involved. Access into the tunnel would be very difficult.

- Security concerns would be increased with a tunnel. Measures would be needed to prevent people from entering the tunnel that would be costly.

Southern Pacific Lines (SP; contained in a letter dated June 2, 1995)

The SP has a number of concerns not only with the construction, operation and maintenance of the proposed tunnel, but also with a late proposal of this magnitude and expense. The obvious concerns associated with the tunnel include safety, security, operations and maintenance. SP's experience with tunnel sections in other locations has been that they attract trespassers and vandals, and they provide shelter for wide range of undesirable activities. Access for emergency response would be severely restricted. Operations and maintenance costs would be considerably higher than otherwise, due to the confined environment of the tunnel.

Burlington Northern Santa Fe Corporation (BNSF–formerly known as Atchison, Topeka and Santa Fe Railway Company [ATSF]; contained in a letter dated May 26, 1995)

The ATSF, as it was then called, voiced a number of objections to the proposal, including its high cost, the potential for closure due to flooding, air quality problems, and the resultant delay to the construction schedule.

In addition, the ATSF articulated several detailed comments, as follows:

- *Ground water exposure.* The costs associated with track maintenance are historically higher in tunnels because of continued seepage of subsurface water, which is virtually impossible to prevent from mitigating into the ballast section. As the length of the tunnel increases, the magnitude of the potential problem also increases. Drainage systems have not proven effective in reducing the problem. This would also result in problems affecting the flood control system in the area, resulting in the need to install and extensive collection and pumping system.

- *Air quality.* A positive ventilation system will be required to remove air contaminants from the tunnel. A failure of the requisite equipment will necessitate closure of the tunnel section until the problem is rectified. Diesel exhaust will be a problem when a train is accelerating through the tunnel.

- *Added costs.* The costs of the required tunneling will be much higher than initially anticipated, and there will be adverse scheduling impacts that are not now known. Historically, the cost of track maintenance in tunnel sections has been substantially higher than for either at grade or open depressed sections, largely due to problems of ground water infiltration. It is the opinion of the ATSF that the estimated annual maintenance cost of $900,000 is below the figure that would correspond with its experience. The capital cost estimate may also be low.

At its July, 1995 meeting, the ACTA Governing Board considered the findings of the *Compton Truck Tunnel & Rail Cover Review.* Four options were identified for the Governing Board's consideration, as follows:

Option #1: Confirm the project description as currently adopted (by action of the Governing Board in January, 1993) and described as the "locally preferred alternative" in the DEIS.

Option #2: Modify the project description to include both the truck tunnel and rail cover.

Option #3: Modify the project description to include the rail cover only.

Option #4: Option #1, augmented to include the development of a master plan for landscaping and urban design for the entire 20-mile Corridor, with special consideration given to the Compton Business District. Potential treatments to be

considered would include wider bridges at key locations, which could be developed into pedestrian plazas, and other amenities.

Option #4 was recommended by the staff for adoption by the Governing Board.

Also presented at the same meeting of the Governing Board was a proposal from the City of Compton, referred to as "Enhanced Option 4." This proposal would include several components which were not identified as part of Option #4, namely:

- consideration of an iron grate mesh to cover those portions of the trench not covered by street or pavement sections,

- cooperation of ACTA and Compton with SCAG in the development of SCAG's truck traffic study,

- the identification and inclusion of additional mitigation measures specifically designed to further reduce Corridor construction impacts on the Compton Business District, and

- cooperation of ACTA with State and Federal agencies in developing local job creation, training and apprenticeship programs.

The ACTA Governing Board requested a response from staff regarding the costs and other implications of the Compton proposal. Between July and September, 1995, ACTA staff, working in conjunction with its consultants, examined the details of the Compton proposal and conducted a number of workshops with Compton representatives. The result of this activity was an "Enhanced Option 4" which was felt by all parties to adequately address the concerns of the City of Compton, while at the same time not causing undue financial hardship to the project as a whole. The elements of "Enhanced Option 4" are as follows:

A. ACTA agrees to develop a master plan for landscaping and urban design for the entire 20-mile corridor, with special consideration given to the Compton Central Business District; crossings will be classified as "A," "B" or "C," according to their adjacent land uses and pedestrian and vehicular volumes.

B. A series of cut-and-cover sections and wider bridges will be built at key intersections over the lowered railway in Compton; Compton staff and ACTA consultants will continue to meet to coordinate the design of these intersections; at Compton Boulevard, the width of the cut-and-cover section would be 100 feet from each side of the street; at Myrhh Street and Palmer Street, the width of the cut-and-cover section would be 75 feet from each side of the street; Greenleaf and Alondra Boulevards would be classified as "B" crossings.

C. Cut-and-cover sections will be developed into pedestrian plazas with planters, kiosks, and other amenities; Compton staff and ACTA consultants will meet and develop plans for the cut-and-cover sections.

D. Within the City of Compton, graded slopes adjacent to the rail trench will be used to the extent possible to maximize line of sight across the rail trench; within these sections, the

goal would be to have a fence no higher than 4 feet above sidewalk level; outside of these graded sections, the goal would be to minimize fence height subject to safety considerations.

E. ACTA and Compton will cooperate with SCAG in the development of the regional truck traffic study. Upon completion of the SCAG regional truck traffic study, ACTA and Compton will work together to develop appropriate measures to mitigate any potential increases in truck traffic due to port related activities identified in the SCAG study.

F. Mitigations specifically designed to reduce Corridor construction impacts on the Compton Business District will be studied and adopted; Compton staff and ACTA consultants will meet and cooperate in developing the study's criteria and framework.

This information was considered by the Compton City Council at its September 5, 1995 meeting, and "Enhanced Option 4" was adopted by that body at that meeting as representing the official position of the City of Compton.

"Enhanced Option 4" (and the supporting action by the Compton City Council) was presented to the Governing Board at its September 14, 1995 meeting. At this meeting, the ACTA Governing Board agreed to implement "Enhanced Option 4."

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WRITER'S DIRECT DIAL:
213-236-2835

OUR FILE NO. 01047-007

March 27, 1995

RECEIVED
MAR 27 1995
ENV. PLAN. BR.

Mr. Ronald J. Kosinski
Environmental Branch Chief
CalTrans, District 7
120 South Spring Street
Los Angeles, CA 90012

Re: Comments on Draft EIS - Alameda Corridor Project

Dear Mr. Kosinski:

The City of Compton ("Compton") hereby provides the Federal Highway Administration, the Federal Railroad Administration and the California Department of Transportation with the following written comments on the Draft Environmental Impact Statement ("Draft EIS") for the Alameda Corridor Project. The written comments provided by the City have been divided into the following categories and are accordingly attached to this letter:

I. Legal comments from Burke, Williams & Sorensen, special environmental legal counsel to Compton; and

II. Technical comments from Ultrasystems Environmental, Inc., consultant to Compton.

Compton has made every attempt to avoid repetitiveness in the formatting of this comprehensive set of written comments. There is some overlap that was unavoidable in the general areas of these comments but this overlap arises form comments addressing different concerns in similar areas.

The comments when read as a whole effectively demonstrate that this is a seriously flawed Draft EIS. There are numerous gaps in the studies and analyses that need to be rectified and supplemented. Most strikingly, the document relies so heavily on the previous Environmental Impact Report for this same project that the Draft EIS fails to provide an

independent critical analysis for the decision-making agencies. The best remedy to correct these flaws may be to correctly analyze the project and redraft and recirculate another Draft EIS.

Another remedy, that would be more efficient, would be to form a mitigation committee made up of the communities impacted by this proposed project and allow them to have meaningful input into shaping the project's impact on local communities. Mitigation committees have been employed on transportation projects with success and this project would appear to be a good candidate for such a solution. As the attached comments indicate, the failure of the responsible agencies to independently study this project renders the Draft EIS extremely vulnerable to attack. Employing a mitigation committee reduces the incentive to attack the project and would result in a better Alameda Corridor Project for all parties.

Compton is prepared to meet and discuss any of the comments attached to this letter with representatives of the responsible agencies and to answer any questions they may have with the attached comments. Compton is also ready and willing to participate in a mitigation committee created by FHWA, FRA and CalTrans.

Please feel free to contact Compton or the undersigned if there are any questions.

Sincerely,

JEFFREY KIGHTLINGER
for BURKE, WILLIAMS & SORENSEN

Enclosure
cc: Honorable Mayor and City Council
John Johnson, Asst. City Manager
Peter Lewandowski, Ultrasystems Environmental, Inc.

AX2:123679.1

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WRITTEN COMMENTS

On The

DRAFT ENVIRONMENTAL IMPACT STATEMENT

For The

ALAMEDA CORRIDOR PROJECT

Report No. FHWA-CA-EIS-95-01-D

Prepared For

THE CITY OF COMPTON

TAB 1: LEGAL COMMENTS
Burke, Williams & Sorensen

TAB 2: TECHNICAL COMMENTS
Ultrasystems Environmental, Inc.

March 27, 1995

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LEGAL COMMENTS

On The

DRAFT ENVIRONMENTAL IMPACT STATEMENT

For The

ALAMEDA CORRIDOR PROJECT

Report No. FHWA-CA-EIS-95-01-D

Prepared For

THE CITY OF COMPTON

Prepared By

BURKE, WILLIAMS & SORENSEN

March 27, 1995

AX2:123508.1

I.

INTRODUCTION

As noted in the Draft Environmental Impact Statement for the Alameda Corridor Project ("Draft EIS"), the Port of Los Angeles and the Port of Long Beach (the "Ports") constitute the largest seaport complex in the United States and the third largest seaport complex in the world, and carry one-fourth of all U.S waterborne international trade. *Draft EIS*, pp. 1-3. In 1991 alone, 99 million metric tons of cargo were carried to and from these ports via 28 trains trips and 20,000 truck trips *each day*. *Draft EIS*, p. 1-3, 1-6. By the year 2020, the Ports are expected to handle 210 million metric tons, with a corresponding increase in rail and truck traffic. *Draft EIS*, 1-4.

The Alameda Corridor Project has as its purpose the consolidation of commercial traffic between the San Pedro Bay Ports and distribution points in the City of Los Angeles in order to maintain the viability of the Ports and to offset the potentially adverse effects accompanying the anticipated growth. *Draft EIS*, p. S-4; 1-1. As stated in the Draft EIS:

> The purpose of the Alameda Corridor project is to facilitate access to the ports through the years 2020 to accommodate anticipated ports growth, thereby reducing highway traffic congestion, air pollution, vehicle delays at grade crossings and noise in residential areas. The fundamental purpose of the Alameda Corridor project is to provide a means for improved goods movement by which the adverse consequences of increased freight rail traffic can be reduced, while at the same time sustaining economic growth.

Draft EIS, p. S-4, 1-1.

According to the Draft EIS, the construction of this consolidated corridor will result in a myriad of benefits for the Southern California region, including increased economic growth, improved traffic conditions, improved railroad operations and enhancement of the environment. *Draft EIS*, pp. S-4, S-5, 2-1, 2-2.

Yet while the Draft EIS emphasizes the *regional* benefits of the Alameda Corridor Project, it de-emphasizes the project's heavy *local* costs. As discussed more fully in these comments, this project has numerous potential environmental, social and economic impacts which will be felt primarily and disproportionately by those communities through which the corridor will be constructed, including the City of Compton.

Under the current preferred "alternative," rail traffic would be consolidated in a depressed, *uncovered* trench (30 feet deep by 50 feet wide) running along Alameda Street and *straight through the heart of Compton*. The City has serious concerns with this alternative both in terms of its potential to divide the City and in terms of its impacts on residents and businesses both during and after construction. Of equal concern, however, is the fact that alternatives and

mitigation measures which might lessen or eliminate these impacts have been ignored at every stage of the environmental review process.

For example, the City of Compton and others have repeatedly suggested that a *covered*, depressed rail and roadway alternative should be studied as part of the project. Under this alternative, both the railway and the roadway would be depressed and covered, providing direct access to and from the San Pedro Bay Ports for *all* commercial traffic. This alternative would further many of the goals of the Alameda Corridor Project and enhance its value by providing a truly consolidated corridor. Yet despite the obvious merits of this alternative, it was dismissed out of hand during the state review process and again has been rejected for consideration in the draft EIS--all without the benefit of any studies, investigations or other assessments analyzing its feasibility.

While the failure to adequately analyze reasonable alternatives to the Alameda Corridor Project is perhaps the most serious deficiency, it is by no means the only one. Discussed below and in the accompanying technical comments are numerous substantive deficiencies in the Draft EIS and glaring procedural deficiencies in the review process. Together, these deficiencies depict an approach by state and federal lead agencies so convoluted as to preclude meaningful public review of the Alameda Corridor Project and to pre-ordain that their "preferred alternative," i.e. a depressed, uncovered railway, would be selected for approval.

At a cost of over $1.8 billion the Alameda Corridor Project represents a major commitment by federal, state and local agencies to the goal of a consolidated commercial corridor. Since this project's conception fourteen years ago, the City of Compton similarly has been committed to the regional goal but with the understanding that Compton not be severely impacted by the final design. The Federal Railway Administration ("FRA"), the Federal Highway Administration ("FHWA") and the California Department of Transportation ("CalTrans") as the responsible agencies, now must demonstrate their commitment to those communities most adversely affected by the Alameda Corridor Project by ensuring that all impacts, mitigation measures and alternatives receive fair and adequate consideration before any decision on the project is made.

II.

COMPTON'S GOALS AND CONCERNS

The City of Compton ("City" or "Compton") is one of a number of cities along the route of the Alameda Corridor Project. The project as proposed will traverse the cities of Los Angeles, Vernon, Huntington Park, South Gate, Lynwood, Compton, Carson, Wilmington and Long Beach having impacts that are unique to each city.

In Compton's case, the impacts of the Alameda Corridor Project are particularly severe due to the fact that the proposed design calls for the project to be built straight through the heart

of the community. The impacts of the Alameda Corridor Project on Compton primarily will be on its commercial downtown zone and residential areas. In some of the other cities, the project would primarily traverse industrial areas that are lightly populated. These communities also have concerns with the project but they are different than those of Compton.

Compton is a community that is ethnically diverse. According to the 1990 Census, the population of Compton is 90,454. The racial makeup of Compton's population is as follows: 52.7% is African-American; 43.7% is Hispanic; 1.7% is Asian; 1.5% is White; and 0.4% consists of other races. Often minority communities suffer disproportionate impacts on regional projects and it is one of Compton's goals to ensure that this does not occur with this project. Compton also has an active business community that caters to the local population. Another of Compton's goals is to ensure that this project does not harm the local businesses during construction of the Alameda Corridor Project and afterwards.

In addressing these goals, Compton provided comments to the Alameda Corridor Transportation Authority ("ACTA") during the preparation of the Final Environmental Impact Report ("Final EIR") on this project. Compton specifically requested that ACTA study and adopt an alternative that would include a combined rail and roadway that would be depressed and covered. This would act to greatly reduce the impacts on local residents. Compton also requested that studies be conducted on the impacts to local businesses with greater mitigations provided to help those companies remain in business during and after construction.

These requests were not addressed in the Final EIR. As ACTA has been disinclined to study these project alternatives and mitigation proposals, an independent review by separate committee or in the Draft EIS is required. A good local model exists for such an independent study of mitigation enhancements on a federal transportation project. In 1992, CalTrans and FHWA prepared an EIS on the Route 710 Long Beach Freeway gap closure project. That proposed project is a short, 6.2 mile gap closure on an existing freeway in Los Angeles County. Compared to the length or the volume of traffic that is foreseen for the Alameda Corridor Project, the 710 Freeway project is a relatively small project with a projected cost at roughly one third of the Alameda Corridor Project's cost.

After preparation of the Final EIS on the 710 Freeway project, FHWA and CalTrans formed a Route 710 Meridian Variation Mitigation and Enhancement Advisory Committee. This Mitigation Committee consisted of an elected official and a citizen representative from each city along the project route to provide local input, representatives from the Southern California Association of Governments and the Los Angeles County Metropolitan Transportation Agency to provide regional input, and ex officio members from CalTrans and FHWA to facilitate the process. Other stakeholders were later added to address specific issues such as historic housing and environmental concerns.

The Route 710 Mitigation Committee reviewed the impacts of the proposed project in specific areas and received input from various groups and individuals on specific impacts. With this information, the Committee directed CalTrans to review proposals, prepare cost estimates

and provide the Committee with technical information. The resulting product was a Report from the Mitigation Committee to CalTrans and the FHWA recommending a number of enhanced mitigations to the project. CalTrans reviewed those recommendations and agreed to accept the majority and incorporate them into the project while others were rejected as being either too costly or because CalTrans lacked the legal authority to provide certain benefits.

The Route 710 Mitigation Committee process enabled long standing opponents of the project to work with project supporters in a constructive manner. The end result was a project with enhanced mitigations that was more responsive to local concerns. The Alameda Corridor Project has greater impacts to a larger population across a wider geographical area than the Route 710 Freeway gap closure project and Compton believes that the same mitigation committee approach should be applied here.

The City of Compton would be ready and willing to participate in a mitigation committee process that included all the cities along the route and regional stakeholders. This process could address local concerns and help ensure that the final project is the best possible project. As the impacts of the Alameda Corridor Project will be felt for generations throughout Los Angeles County, an Alameda Corridor Project Mitigation and Enhancement Advisory Committee should be formed before a Final EIS is approved.

III.

NEPA'S REQUIREMENTS

In 1970, Congress enacted the National Environmental Policy Act ("NEPA"), as amended, 42 U.S.C. section 4321 *et seq.*, in response to a growing sentiment that federal agencies have an affirmative responsibility to ensure protection of the environment. In enacting NEPA Congress recognized the "profound impact of man's activity" on the environment and directed that the federal government:

> use all practicable means and measures, including financial and technical assistance, in a manner calculated to foster and promote the general welfare, to create and maintain conditions under which man and nature can exist in productive harmony, and [to] fulfill the social, economic, and other requirements of present and future generations of Americans.

42 *U.S.C.* § 4331(a); *see also* 42 *U.S.C.* § 4321 (declaring purpose of NEPA is "to encourage productive and enjoyable harmony between man and his environment" and "to promote efforts which will prevent or eliminate damage to the environment and biosphere"); 42 *U.S.C.* § 4331(b) (listing specific policies of NEPA, including assuring "for all Americans safe, healthful, productive, and aesthetically and culturally pleasing surroundings" and attaining "the widest range of beneficial uses of the environment without degradation, risk to health or safety, or other undesirable and unintended consequences").

As our country's "basic national charter for protection of the environment," NEPA requires that to the fullest extent possible, federal agencies must carry out their programs, regulations and policies in a manner consistent with these goals and policies. 42 *U.S.C.* §§ 4331(b), 4332; 40 *C.F.R.* § 1500.2. To this end, NEPA establishes an interdisciplinary approach to agency decision-making designed to encourage protection of all aspects of the environment and contains specific "action-forcing" procedures to ensure that federal agencies act according to both the letter *and the spirit* of NEPA's mandates. 42 *U.S.C* § 4332; 40 *C.F.R.* § 1500.1.

Chief among these action-forcing procedures is the preparation of an environmental impact statement ("EIS") for any major federal action significantly affecting the quality of the human environment. 42 *U.S.C.* § 4332(c). As the foundation upon which project decisions are made, the EIS is critical to achieving NEPA's purpose of preserving and enhancing the environment.

As noted by one court:

> First, [the EIS] permits the court to ascertain whether the agency has made a good faith effort to take into account the values NEPA seeks to safeguard. . . . Second, it serves as an environmental full disclosure law, providing information Congress thought the public should have concerning the environmental costs involved in a project. . . . Finally, and perhaps most substantively, the requirement of a detailed statement helps insure the integrity of the process of decision by precluding stubborn problems or serious criticism from being swept under the rug.

Silva v. Lynn, 482 F.2d 1282, 1284-85 (1973); *see also Monroe County Conservation Council, Inc. v. Volpe*, 472 F.2d 693, 697 (2d Cir. 1972) (primary purpose of EIS "is to compel federal agencies to give serious weight to environmental factors in making discretionary choices"); *Calvert Cliffs' Coord. Comm., Inc. v. Atomic Energy Comm.*, 449 F.2d 1109, 1114 (D.C. Cir. 1971).

Preparation of an adequate EIS, therefore, is not simply a paper exercise--it is the principle vehicle by which the public is involved in the environmental review process and, in turn, by which the goals of NEPA are achieved. Only where the EIS fully and fairly evaluates potential impacts, mitigation measures and alternatives to a proposed project can the public be confident that the project is the result of informed decision-making made *before* the agency has made "irreversible and irretrievable commitments of resources." 42 *U.S.C.* § 4332(2)(C)(v).

NEPA, of course, does not mandate a particular result. But it does require a particular process, one which results in full disclosure of project information and active involvement of the public at each stage of the environmental review and decision-making process. 40 *C.F.R.* § 1506.6 Under NEPA, decisions cannot be made in a vacuum or under a veil of secrecy.

Rather, they must be made under the watchful eye of the public so as to reassure an "apprehensive citizenry" that the agency in fact has given adequate consideration to the environmental implications of its actions.

As discussed below, the FRA, the FHWA and Caltrans seem to have forgotten these precepts, both in their preparation of the Draft EIS and in their solicitation of public comment on the Draft EIS.

IV.

PROCEDURAL DEFICIENCIES

A. Inadequate Comment Period

The opportunity to make meaningful comments on the adequacy of a project EIS is essential to ensure that all relevant information is considered before a decision with potentially significant and irreversible effects is made by a federal agency. A prerequisite to making such comments, of course, is a comment period of sufficient duration to allow the public both to review the draft EIS and its supporting references and to analyze the factual assertions and conclusions contained within those documents.

The Draft EIS for the Alameda Corridor Project is over 300 pages in length and references at least 39 additional reports, studies and outside sources, some of which are hundreds of pages long. A review of these materials alone represents a formidable task. But when coupled with the fact that the Draft EIS incorporates the Final Environmental Impact Report ("Final EIR") previously circulated in January 1993, the task of reviewing and making meaningful comments on the Draft EIS becomes daunting.

The Final EIR is over 750 pages in length and cites over 100 additional sources, many of which again are hundreds of pages long. And it must be emphasized that the Draft EIS for the project does not simply reference this Final EIR--it incorporates the entire document *wholesale*. As noted on the first page of the Draft EIS, "The previously prepared Environmental Impact Report is part of this EIS and is being considered as part of the NEPA process." *Draft EIS*, p. S-1. True to this statement, *every* section of the Draft EIS refers the reader to the Final EIR for a "detailed discussion" of impacts, mitigation measures and alternatives. *See, e.g.*, *Draft EIS*, ch. 2 (referring reader to Final EIR for detailed discussion of alternatives considered and rejected for further review); ch. 3 (referring reader to Final EIR for discussion of environmental setting for project (17 topics in total) and noting that the "analysis reported in the EIR is a part of this EIS"); ch. 4 (referring reader to Final EIR for detailed discussion of project impacts, including specific, secondary and cumulative impacts, and mitigation measures (33 topics in total)).

Thus there are literally *tens of thousands* of pages of materials to be reviewed, analyzed and responded to before the close of the public comment period. Yet despite the obvious complexity of this task, the federal lead agencies established a public review and comment period for the Alameda Corridor Project of only 45 days--the *minimum* period allowed under NEPA, *see* 40 *C.F.R.* § 1506.10(c), and one which allows only the most cursory review of the Draft EIS. 1

Perhaps more damaging to the City of Compton's ability to make meaningful comments on the Draft EIS is the fact that the review period was closed *prior* to the completion of additional studies concerning the Alameda Corridor Project. Most notably, the Alameda Corridor Transportation Authority ("ACTA"), the state lead agency for this project, is currently in the process of preparing a detailed study of an alternative suggested by the City in which both the railway and the roadway would be depressed and covered. In addition, ACTA is preparing a local circulation study analyzing the corridor's specific impacts on traffic flow within the City of Compton, as well as preparing additional mitigation measures designed to lessen the project's impacts on Compton's residents and businesses, both during and after construction. *See* discussion *infra* Section IV.B. 2

Scheduled to be complete in approximately 60 days, these studies are directly relevant to the project. Moreover, since these studies focus on and are addressed to concerns raised specifically by Compton, they will almost certainly impact the City's view of the Alameda Corridor Project and therefore are critical to the City's ability to make meaningful comments. By closing the public comment period prior to the completion of these studies, the lead agencies are forcing the City of Compton, as well as other members of the public, to make comments on important aspects of the project based on conjecture rather than fact, to hypothesize about what might be rather than what will be.

Equally disturbing to the City of Compton is the fact that its repeated requests for an *appropriate* extension of the comment period essentially were ignored by the lead agencies. By letter dated February 7, 1995, the City requested that the comment period be extended for 45 days in view of the number of documents and complexity of review.

In a terse response dated February 15, 1995, CalTrans granted only a two week extension, stating: 3

> We have reviewed your request for an extension of the public comment period for the Alameda Corridor DEIS. The Alameda Corridor Draft *EIR* was circulated to the public in 1992 and a total of six public hearings were held. All comments including those from the City of Compton were responded to in the Final *EIR*. The City of Compton participated in the scoping activities for the EIS in 1994. The review period for the Alameda Corridor EIS which ends on March 13, 1995, meets NEPA requirements.

Letter from Ronald J. Kosinski, Chief, Office of Environemntal Planning, CalTrans to John D. Schlotterbeck, Special Environemntal Counsel, CIty of Compton (Feb. 15, 1995.)

Subsequent to the City's first request, the ACTA Governing Board then voted to prepare the additional studies discussed above. As a result, by letter dated February 15, 1995, the City made another request for an extension of the review period, in this instance until after completion of the ACTA studies. The letter urged a prompt reply in view of the approaching deadline for making comments on the Draft EIS.

Receiving no response, the City made a third written request, dated March 13, 1995, for an extension of the public review period. This letter explained in detail the scope and relevance of the ACTA studies and stressed the need for a review period commensurate with the complexity of the issues involved in the project. The letter also requested that, regardless of the decision, the federal agencies' provide a formal response to the City of Compton's extension request so that the City could structure its comments accordingly. No response was ever received.

(3)

The City also made innumerable verbal inquiries to CalTrans regarding the status of its extension requests, each time being told that no decision yet had been made. A final inquiry to CalTrans made approximately one week before these comments were due resulted in the same answer--that no decision on the City's request had been made, *nor would one be made prior to the close of the comment period.* The City was told, however, that CalTrans would continue to consider any comments submitted by the City after the close of the comment period.

CalTrans' responses to the City's extension requests--at times perfunctory and at other times evasive--demonstrates a lack of appreciation both for the City's legitimate concerns with this project and for its desire to have those concerns receive adequate consideration by the lead agencies prior to any decision on the project. CalTrans' February 15th letter, for example, ignores the fact the Alameda Corridor Project is now in the *federal* environmental review process. While the City may have had an opportunity to review the Final EIR, it did not have an opportunity to review the EIR in the context of the Draft EIS and applicable NEPA standards. Moreover, the two-week extension granted provides absolutely no assistance to the City in terms of reviewing and commenting on the studies being prepared by ACTA.

Similarly, CalTrans' statement that comments received after the close of the public comment period will be considered provides little assurance that the City's concerns will be adequately addressed. As CalTrans and the other lead agencies are fully aware, only those comments made *before* the close of the public review period are part of the administrative record and subject to further judicial review. *See, e.g., Camps v. Pitts*, 411 U.S. 138 (1973) (indicating that "focal point" for judicial review is administrative record; *Citizens to Preserve Overton Park, Inc. v. Volpe*, 401 U.S. 402, 420 (1971) (remanding case to district court for plenary review "based on the full administrative record that was before the Secretary at the time he made his decision" and cautioning court not to make "post hoc rationalizations"); *Coalition on Sensible Transp., Inc. v. Dole*, 826 F.2d 60 (D.C. Cir. 1987). The City would have

absolutely no recourse should CalTrans fail to consider comments submitted after the close of the public review period, regardless of the merits of the issues or arguments raised in such comments.

Ironically, in adopting the implementing guidelines, the Council on Environmental Quality ("CEQ") rejected universal time limits for the NEPA process as "too inflexible," instead encouraging federal agencies to "set time limits appropriate to the individual actions." 40 *C.F.R.* § 1501.8. The CEQA regulations instead list factors to be considered in determining the length of the review period. These include: (1) potential for environmental harm; (2) size of the proposed action; (3) state of the art of analytic techniques; (4) degree of public need for the proposed action, *including the consequences of delay*; (5) number of persons and agencies affected; (6) degree to which relevant information is known and *if not known the time required for obtaining it*; and (7) degree to which the action is controversial. *Id.*

Clearly, these factors militate in favor of an extended public review and comment period for the Alameda Corridor Project. Spanning twenty miles and costing $1.8 billion dollars, the Alameda Corridor Project constitutes a massive endeavor with many potential environmental, social and economic impacts. The corridor will pass through nine separate communities directly affecting hundreds of businesses and thousands of residents, and indirectly affecting many, many more.

And while the consolidation of commercial traffic is an important project, it is not urgently needed to protect the public health and safety or the environment. Additional relevant information concerning project impacts, mitigation measures and alternatives is only 60 days away from being available for public review. Extending the review period until such information is available would only briefly delay a process which has spanned two decades and would in no way adversely affect achievement of the project's objectives. Rather, extending the public comment period would enhance the project by ensuring that all relevant information is considered as part of the decision-making process.

It also should be noted that other agencies *and CalTrans* typically have granted lengthy extensions of the public review and comment period for project's of similar magnitude and complexity. For example, the Forest Service recently extended the review period for the Draft EIS/EIR on the proposed Elsmere Canyon Landfill to over six months. Similarly, CalTrans itself has allowed a number of lengthy comment periods on the Final EIS for the proposed gap closure on the Long Beach (I-710) Freeway.

Oblivious to both the factors outlined in the CEQ regulations and to their own historical approach to granting extensions of the review period for a project of this magnitude, the FRA, FHWA and CalTrans have opted to treat the minimum review period allowed under NEPA as the full extent of their obligations. In doing so, the lead agencies have eviscerated the public review process for this Alameda Corridor Project and eliminated the possibility of obtaining anything other than cursory comments on the project.

B. Failure to Consider Subsequent Studies

As noted above, ACTA is currently in the process of preparing several additional studies relevant to the Alameda Corridor Project. Specifically, ACTA is preparing a local circulation study analyzing the corridor's specific impacts on traffic flow within the City of Compton and studying additional mitigation measures designed to lessen the project's impacts on Compton's residents and businesses. More importantly, ACTA is preparing a detailed review and analysis of an alternative proposed by the City of Compton.

Under this proposed alternative, both the railway and the roadway would be depressed and covered, providing direct access to and from the Ports for both vehicular and rail traffic. This alternative would create a completely consolidated commercial corridor, furthering many of the goals established for this project. Moreover, this alternative would prevent the corridor from dividing the City of Compton in half and eliminate the attendant blight that such a division necessarily would bring. It would also prevent Alameda Street from becoming a thoroughfare for heavy commercial traffic, which is very likely to occur if the corridor is built as planned. *See Draft EIS*, p. 2-1 (citing as goal of project to "provide alternative route to parallel freeways").

Despite its merits, this alternative initially was rejected for consideration during the state review process as being "too costly." Yet, this conclusion was reached without the benefit of *any* studies, investigations or assessments analyzing the economic feasibility of such an alternative. (1)

ACTA's belated decision to prepare additional studies implicitly recognizes that important aspects of the Alameda Corridor Project have been ignored. But while ACTA's actions are commendable, they are of little moment in view of the federal lead agencies' decision to close the review period prior before these studies are completed.

The studies being prepared by ACTA are not designed merely to re-examine existing information, but in fact will produce entirely *new* and significant information pertaining to the Alameda Corridor Project. The study of the City's proposed alternative, for example, addresses seven specific areas: right-of-way, air quality, noise and aesthetic impacts, design requirements for rail cover, utility relocations, project compatibility and phasing options, and construction impacts. *None* of these areas were previously addressed as part of the environmental review process. (2)

The lead agencies' decision to ignore ACTA's studies by closing the review period before their completion not only contradicts NEPA's intent that all relevant information concerning a project be considered, but will further complicate an already tortured environmental review process.

Under NEPA, a supplemental environmental impact statement is required whenever "[t]here are significant new circumstances or information relevant to environmental concerns and

bearing on the proposed action or its impacts." 40 *C.F.R.* § 1502.9(c)(4). The ACTA studies clearly constitute such new information and undoubtedly will paint a seriously different picture of the environmental consequences of the project and the ability of mitigation measures or alternatives to lessen these consequences. *See, e.g., Oregon Natural Resources Council v. Marsh*, 832 F.2d 1489 (9th Cir. 1987) (requiring supplemental EIS where new studies prepared); *Louisiana Wildlife Fed'n, Inc. v. New York*, 761 F.2d 1044 (5th Cir. 1985); *Essex County Preservation Ass'n v. Campbell*, 536 F.2d 956 (1st Cir. 1976); *National Wildlife Fed'n v. Hodel*, 15 Envtl. L. Rep. 20891 (E.D. Cal. 1985); *Marple Township v. Lewis*, 21 Env't Rep. Cas. 1010 (E.D. Pa. 1982) (requiring supplementation because new information was not subject to public comment). (2)

Ultimately, therefore, the federal lead agencies will have to solicit public comment on the ACTA studies prior to making any decision on the project. *See Essex County Preservation Ass'n*, 536 F.2d at 961 (finding district court's requirement that supplemental impact statement be prepared proper where project at issue not yet completed and agency decisions remained open to revision); *Johnson v. Lynn*, 477 F.2d 885, 890 (1st Cir. 1973). It makes far more sense for the lead agencies to solicit such comments now as part of the review of the Draft EIS.

The federal agencies refusal to consider these studies is especially perplexing given that these agencies have often (perhaps too often) looked to ACTA for guidance and direction as to how to proceed with the Alameda Corridor Project. One can only surmise that the lead agencies already have determined that the ACTA studies will not produce any new or relevant information about the project. But even if this proves to be the case, the City of Compton's comments on the analysis and conclusions contained in those studies *would* represent important information which must be considered by the lead agencies.

C. Improper Reliance on Final EIR

Page one of the summary states, "The previously prepared Environmental Impact Report is part of this EIS and is being considered as part of the NEPA process." *Draft EIS*, p. S-1. Facially innocuous, this statement belies the fact that the Draft EIS does not merely reference portions of the Final EIR, but instead incorporates that entire document. Repeatedly, the Draft EIS refers to and relies on the Final EIR for its analysis of project impacts, mitigation measures and alternatives. *See Draft EIS*, Chs. 2, 3 & 4 (referring reader to Final EIR for "detailed discussion" of project). By doing so, the federal lead agencies have created an EIS which is cumbersome, complex and essentially useless as an informative document.

As noted in the NEPA regulations, "The primary purpose of an environmental impact statement is to serve as an action-forcing device to insure that the policies and goals defined in the Act are infused into the ongoing programs and actions of the Federal Government." 40 *C.F.R.* § 1502.1. As such, an EIS must be "analytic rather than encyclopedic" and "no longer than absolutely necessary" to comply with NEPA and its implementing regulations. 40 *C.F.R.* § 1502.2. In general, an EIS should be under 150 pages in length or under 300 pages in length for projects of "unusual scope or complexity." 40 *C.F.R.* § 1502.7. An EIS must be "clear,

concise and to the point" and written in "in plain language. . . so that decision-makers *and the public* can readily understand [it]." 40 *C.F.R.* §§ 1502.1, 1502.8 (emphasis added). Finally, agencies must "insure the professional integrity, including the scientific integrity, of the discussions and analyses in environmental impact statements." 40 *C.F.R.* § 1502.24.

Standing alone, the Draft EIS is over 300 pages long; when considered in conjunction with the Final EIR, it blossoms to over *1000* pages long. The sheer length of this document seriously undermines its usefulness in the environmental review and decision-making process, particularly given the short time period allotted by the federal lead agencies for public comment. The Draft EIS's usefulness is further undermined by the fact that the Final EIR is over two years old and many of the reports and studies prepared for or relied upon in the Final EIR are 5 to 10 years old. *See Final EIR*, Appendix II, Bibliography. Much of the data and analyses contained in the Final EIR, and by blanket incorporation in the Draft EIS, is stale.

The Draft EIS's unwieldy incorporation of the Final EIR is also problematic because it forces the reader to switch constantly from one document to the other, making it impossible to distinguish between the state CEQA analysis and the federal NEPA analysis of the Alameda Corridor Project. In this regard, the Draft EIS fails to properly summarize the analysis contained in the Final EIR as required under NEPA when a document is incorporated by reference. *See* 40 *C.F.R.* § 1502.21 (allowing incorporation by reference "when the effect will be to cut down on bulk *without impeding agency and public review*" and requiring that incorporated material be cited and briefly described").

For example, although chapter 4 of the Draft EIS purports to summarize the Final EIR's analysis of project impacts and mitigations, it does so *only* for one of the alternatives, Alternative 2.1A, discussed in the Final EIR. Even with respect to Alternative 2.1A, the Draft EIS's "summary" is marginal, consisting principally of referring the reader to the correct sections of Final EIR. *See also Draft EIS*, ch. 3 (referring reader to Final EIR for analysis of environmental setting); ch. 2 (referring reader to Final EIR for analysis of alternatives considered and rejected for further review).

The lead agencies' indiscriminate incorporation of the Final EIR into the Draft EIS is more than merely confusing; it is an improper delegation of their obligation to conduct an independent and objective analysis of the Alameda Corridor Project. Courts have recognized that active federal involvement is critical to a federal agency's ability to rely on an EIR and have disfavored reliance on documents the federal agency had little role in preparing. *See, e.g., Sierra Club v. United States Army Corps of Eng'rs*, 701 F.2d 1011, 1037-39 (2d Cir. 1983); *Conservation Soc'y of Southern Vermont v. Secretary of Transp.*, 508 F.2d 927, 930-33; *Greene County v. FPC*, 455 F.2d 412, 418-20; *Northside Tenants' Rights Coalition v. Volpe*, 346 F. Supp. 244, 248.

The rationale behind this prohibition against allowing federal agencies to rely on environmental documents they did not prepare was explained in *Conservation Society v. Secretary of Transportation*:

> A state agency is established to pursue defined state goals. In attempting to secure federal approval of project, "self-serving assumptions" may ineluctably color a state agency's presentation of the environmental data or influence its final recommendation. Transposing the federal duty to prepare the EIS to a state agency is thus unlikely to result in as dispassionate an appraisal of environmental considerations as the federal agency could produce.

508 F.2d at 931; *see also Sierra Club*, 701 F.2d at 1038 (quoting *Conservation Society*).

This rationale is of even greater force in the instant case since the Final EIR was prepared not by the State, but by the Alameda Corridor Transportation Authority, a local joint powers authority formed for the *sole* purpose of constructing the proposed corridor. *See Final EIR*, Appendix III, List of Preparers (listing ACTA as the only governmental agency involved in preparation of Final EIR); *Notice of Intent*, 58 *Fed. Reg.* 65756-57 (1993) (citing only ACTA as the responsible agency for preparation of Final EIR). A review of agencies consulted demonstrates clearly that neither the FRA, FHWA, nor CalTrans played a significant role in the preparation of the Final EIR. *See Final EIR*, Appendix IV, List of Persons and Organizations Consulted (showing only minimal involvement by US Department of Transportation and CalTrans, and no specific involvement by either the FRA or the FHWA). As the Draft EIR acknowledges, ACTA withdrew from the federal review process in early 1991 and "the process moved forward under the California Environmental Quality Act (CEQA) *alone*." *Draft EIS*, p. S-1 (emphasis added).

Nor can the lead agencies take refuge in the fact that their role in the Alameda Corridor Project is primarily one of providing federal funding. While NEPA allows a federal agency whose role in a project is limited to funding to rely on a state-prepared environmental impact statement, it permits the agency to do so only if: (1) "the State agency or official has statewide jurisdiction and has the responsibility for such action;" (2) "the responsible Federal official *furnishes guidance and participates in such preparation*;" (3) the responsible Federal official *independently evaluates such statement prior to its approval and adoption.*" 42 *U.S.C.* § 4332(D)(i)-(iii) (emphasis added). Here, neither the FRA nor the FHWA participated in the preparation of the Final EIR, nor did these agencies independently evaluate the Final EIR prior to its approval and certification by ACTA.

In addition, the exception provided under Section 102(2)(D) applies only to *state*-prepared environmental review documents. This section specifically states, "Any detailed statement required . . . for any major Federal action funded under a program of grants to States shall not be deemed to be legally insufficient solely by reason of having been prepared by a *State* agency or official. . . ." 42 *U.S.C.* § 4332(2)(D) (emphasis added). Courts interpreting this section have held that it does not allow federal funding agencies to rely on *locally*-prepared review documents. *See, e.g., Greenspan v. Federal Highway Administration*, 488 F. Supp. 1374, 1378-80 (D. Md. 1980).

In short, the federal lead agencies had an affirmative obligation to *independently* evaluate the merits of the Alameda Corridor Project. By making the Final EIR part and parcel of the Draft EIS and relying almost exclusively on its analysis of impacts, mitigation measures and alternatives, the lead agencies have failed to meet their obligation under NEPA to ensure that the project was evaluated with the requisite fairness, impartiality and objectivity. *See Sierra Club*, 701 F.2d at 1038; *Natural Resources Defense Council v. Callaway*, 524 F.2d 79, 87 (2d Cir. 1975); *I-291 Why? Ass'n v. Burns*, 517 F.2d 1077 (2d Cir. 1975).

D. Improper Reliance on ACTA's Decisions

While the complete incorporation of the Final EIR into the Draft EIS is the most egregious example of the federal lead agencies' improper delegation of their responsibility and authority under NEPA, it is not the only one. For example, in response to the City's requests that an extension of the comment period be granted, the City was informed that while CalTrans would consider these requests, *ACTA* did not want to grant an such extension. One can only surmise that since the federal lead agencies never formally responded to the City's requests, ACTA's desires prevailed.

As another example, in response to the City of Compton's suggestion that a covered, depressed railway and roadway alternative be studied as part of the project, the federal lead agencies stated, "This potential alternative was considered during the course of preparing the EIS, and it was rejected as an option by the *ACTA Governing Board* by formal action at its meeting of October 1994." *Draft EIS*, p.5-2 (emphasis added).

The failure of the federal lead agencies to consider the City's alternative constitutes a major substantive deficiency in the Draft EIS in view of the potential of this alternative to mitigate or eliminate entirely many of the adverse impacts of the project on Compton, its residents and its businesses. *See* discussion *infra* Section V.A. But it also represents a deficiency in the review *process* because the decision to exclude this alternative from consideration was ACTA's, not the federal lead agencies.

Federal agencies may, of course, cooperate with state and local agencies during the environmental review process. But they may not wholly abandon or relinquish the duties and obligations imposed under NEPA. Federal agencies alone are responsible for ensuring that the environmental review process maintains the "needed objectivity" and complies with NEPA's mandates. The FRA and FHWA seems to have forgotten their role in the Alameda Corridor Project, allowing ACTA to take the lead in the environmental review and decision-making process, thereby allowing the biases and partiality of ACTA in favor of the project to become paramount to the concerns of the City of Compton and other members of the public.

V.

SUBSTANTIVE DEFICIENCIES

A. Inadequate Analysis of Alternatives

NEPA and its implementing regulations require that the draft EIS analyze a range of alternatives capable of accomplishing the project's objectives. 42 *U.S.C.* § 4332(2)(C)(iii); 40 *C.F.R.* § 1502.14. Simple on its face, this requirement is in fact "the heart of the environmental impact statement" and critical to NEPA's implementation. 40 *C.F.R.* § 1502.14; *Monroe County Conservation Council, Inc. v. Volpe*, 472 F.2d 693, 698-99 ("The requirement for a thorough study and detailed description of alternatives . . . is the linchpin of the environmental impact statement."); *Grazing Fields Farm v. Goldschmidt*, 626 F.2d 1068 (1st Cir. 1980) (alternatives analysis is NEPA's "primary" procedural mechanism).[1/]

The alternatives requirement seeks:

> to ensure that each agency decision maker has before him and takes into proper account all possible approaches to a particular project (including abandonment of the project) which would alter the environmental impact and the cost-benefit analysis. Only in this fashion is it likely that the most intelligent, optimally beneficial decision will ultimately be made.

Calvert Cliff's Coordinating Comm. v. Atomic Energy Comm'n, 449 F.2d 1109, 1114 (D.C. Cir. 1971).

To this end, the EIS must "[r]igorously explore and objectively evaluate *all* reasonable alternatives," including reasonable alternatives not within the federal lead agency's jurisdiction. 40 *C.F.R.* § 1502.14(a) & (c). Further, the EIS must devote "substantial treatment" to each alternative considered "so that reviewers may evaluate their relative merits" 40 *C.F.R.* § 1502.14(b), and must describe the reasons for eliminating any alternative from detailed study, 40 *C.F.R.* § 1502.14 (a). Only by doing does the EIS sharply define the issues and provide a clear basis for choice among options by the decision-maker and the public. 40 *C.F.R.* § 1502.14.

1/ So important is this alternatives analysis that federal agencies must "study, develop and describe appropriate alternatives to recommended courses of action" even where no environmental impact statement is required. See 40 C.F.R. § 1507.2(d); National Wildlife Fed'n v. Appalachian Regional Comm'n, 677 F.2d 883 (D.C. Cir. 1981); Marquez-Colon v. Reagan, 668 F.2d 611 (1st Cir. 1981); Hanly v. Kleindienst (II), 417 F.2d 823 (2d Cir. 1972), cert. denied, 412 U.S.908 (1973).

Ignoring these strictures, the federal lead agencies examine *only two* alternatives in the Draft EIS for the Alameda Corridor Project--the "No Build" alternative and the "locally preferred" alternative, "Alternative 2.1B." *See Draft EIS*, ch. 2. Remarkably absent from the Draft EIS is *any* discussion of substitutes for the proposed project, i.e. "primary alternatives," or *any* discussion of alternate means of carrying out the project, i.e. "secondary alternatives." And despite being the "heart" of the environmental impact statement, here the alternatives analysis constitutes the shortest section of the Draft EIS. Clearly, this cursory discussion of only two "alternatives" does not qualify as the type of "rigorous exploration" mandated by NEPA. (1)

Admittedly, a federal lead agency cannot explore every possible alternative to a proposed project. As noted by one court, "So long as there are unexplored and undiscussed alternatives that inventive minds can suggest, without a rule of reason, it will be technically impossible to prepare a literally correct environmental impact statement. . . ." *Fayetteville Area Chamber of Commerce v. Volpe*, 515 F.2d 1021, 1027 (4th Cir. 1975); *See also Resources Ltd, Inc. v. Robertson*, 8 F.3d 1394 (9th Cir. 1993).

But neither can a federal agency excessively restrict the number of alternatives so as to guarantee that its desired alternative necessarily will be chosen for implementation. *See, e.g., California v. Block*, 690 F.2d 753 (9th Cir. 1982) (court troubled that agency's selection of alternatives dictated end result); *Sierra Club v. Espy*, 822 F. Supp. 356 (E.D. Tex. 1993) (finding biased decision-making prevented Forest Service from establishing legitimately broad range of reasonable alternatives).

In this vein, the CEQ has provided guidance on the range of alternatives that agencies must consider:

> For some proposals there may exist a very large or even infinite number of possible reasonable alternatives. . . . When there are potentially a very large number of alternatives, only a reasonable number of examples, *covering the full spectrum of alternatives*, must be analyzed and compared in the EIS.

Memorandum: Forty Most Asked Questions Concerning CEQ's NEPA Regulations, 46 *Fed. Reg.* 18026 (1986) (emphasis added); *see also North Carolina v. FAA*, 957 F.2d 1125 (4th Cir. 1992) (applying "rule of reason" to range of alternatives required to be discussed in EIS); *Olmsted Citizens for a Better Community v. United States*, 793 F.2d 201, 208 (8th Cir. 1986) (same); *River Road Alliance, Inc. v. Army Corps of Eng'rs*, 764 F.2d 445, 452 (7th Cir. 1985) (same), *cert denied*, 475 U.S. 1055 (1986); *City of New York v. USDOT*, 715 F.2d 732, 744 (2d Cir. 1983) (same), *cert. denied*, 465 U.S. 1055 (1984).

Far from representing a "full spectrum of alternatives," however, the "No Build" and "locally preferred" alternatives represent polar opposites. By choosing these two, and only these two, alternatives for discussion in the Draft EIS, the lead agencies have precluded any possibility that the "most intelligent, optimally beneficial decision will ultimately be made" and irreversibly skewed the process in favor of moving forward with the project as planned.

Astonishingly, this deficiency was brought to the attention of the lead agencies by the United States Environmental Protection Agency ("EPA") at the outset of the review process. Responding to the Notice of Intent, the EPA stated:

> The re-issued NOI notes that 1) the EIS will "examine the alternatives previously examined in the Draft EIR and Final EIR," and 2) a "locally preferred" alternative has been "selected for implementation." We are very concerned that this might be contrary to the requirements that an EIS not limit the choice of reasonable alternatives [40 CFR 1506.1(a)(2)], and that by **selecting an alternative for implementation,** the NEPA process may be prejudiced on the basis of the project proponent's taking an interim action which could "determine subsequent development or limit alternatives" [40 CFR 1506.1(3)].

Letter from David J. Farrel, Chief, Environmental Review Section, EPA, to Mary Gray, Transportation Engineer, FHWA (February 24, 1994) (emphasis in original).

EPA went on to state, "We recommend that the Federal Highway Administration (FHWA) and the Federal Railway Administration (FRA) *provide a full range of alternatives* for evaluation in the EIS. For those considered earlier and not carried forward, the EIS should include descriptions of each alternative and *detailed rationale for eliminating the alternative.*" *Id.* (emphasis added).

Having ignored EPA's advice, the federal lead agencies now attempt to justify their actions speciously proclaiming, "The present EIS examines the alternatives previously discussed in the EIR as well as the locally preferred alternative; therefore the choice of reasonable alternatives is not being limited. Chapter 2 describes the alternatives considered and the reasons for rejecting those alternatives that are no longer under consideration." *Draft EIS*, p. 5-3.

Unfortunately, this bald statement has no basis in reality. The Draft EIS does *not* "examine" the alternatives previously discussed in the Final EIR, but simply lists these alternatives and regurgitates the reasons why they were rejected *by the ACTA Governing Board.* For example, in discussing the possibility of a one-way couplet with exclusive truck lanes as the design for the roadway sections of the project, the Draft EIS states:

> This arrangement would limit general purpose traffic to two lanes in either direction, and it would require an extremely costly structure. It was also determined that the demand for the facility, when compared to the construction cost, was not as favorable as originally anticipated. For these reasons, this option was also rejected *by the ACTA Governing Board.*

Draft EIS, p.2-9 (emphasis added); *see also Draft EIS*, table 2-2 (summarizing alternatives discussed in EIR); *see generally Draft EIS*, ch. 2 (relying on and referring to Final EIR's analysis of various alternatives).

Similarly, the two alternatives discussed in the Draft EIS were not selected by the federal lead agencies, but by ACTA. *See Draft EIS*, § 2.5 (discussing process employed by ACTA in selecting locally preferred alternative for implementation). The Notice of Intent candidly admits this fact stating, "The Federal environmental document will be an EIS and it will examine the alternatives previously examined in the DEIR and FEIR, *recognizing that a locally preferred alternative has been selected for implementation.*" *Notice of Intent*, 58 *Fed. Reg.* 65757 (1993) (emphasis added).

In sum, the federal agencies did not conduct *any* independent analysis or assessment of the alternatives previously discussed in the Final EIR, nor were they responsible for selection of the two alternatives examined in the Draft EIS. Instead, the federal lead agencies relied wholly on ACTA's analysis and conclusions regarding the merits or lack of merits of potential alternatives to the proposed project. This is directly contrary to both the letter and the spirit of NEPA. (2)

The treatment of the City's proposed depressed, covered roadway/railway alternative is a vivid example of why an *independent* analysis of alternatives by the *federal* lead agencies is required. Rejecting this alternative the federal lead agencies stated, "This potential alternative was considered during the course of preparing the EIS, and it was rejected as an option *by the ACTA Governing Board* by formal action at its meeting of October 1994." *Draft EIS*, p. 5-2. Yet, as discussed above, the reason this alternative was rejected by ACTA was that it was considered "too costly." But this conclusion was reached summarily, without the benefit of any studies, investigations or other assessments analyzing the feasibility of this alternative.

By relying on ACTA's analysis rather than its own, the federal lead agencies compounded the deficiencies in ACTA's analysis and in turn improperly rejected an alternative with obvious merits--both in terms of its ability to meet the project's objectives and in terms of its ability to mitigate or eliminate many of the adverse impacts on Compton. *See Resources Ltd, Inc.*, 8 F.3d at 1401 ("The 'existence of a viable but an unexamined alternative renders an environmental impact statement inadequate.'"); *Idaho Conservation League v. Mumma*, 956 F.2d 1508, 1519 (9th Cir. 1992) (same).

B. Inadequate Analysis of Impacts and Mitigation Measures

The failure to analyze a reasonable range of alternatives *ipso facto* means that the Draft EIS's analysis of project impacts and mitigation measures is likewise deficient. Yet even with respect to the two alternatives reviewed in the Draft EIS, the analysis of impacts and mitigation measures is seriously flawed. These flaws are discussed in detail in the technical comments submitted in conjunction with these legal comments. Nonetheless, three areas are of particular concern:

1. Economic Impacts

As the Draft EIS admits, "Construction activity along the Alameda Corridor may produce a substantial adverse effect upon businesses located along the corridor. . . . For some businesses, especially small retail operations, prolonged construction could substantially affect their operation and viability." *Draft EIS*, p. 4-62. The Draft EIS goes on to note that "[c]onstruction activity could affect any one block *for up to three years*," requiring both full and partial street closings and creating conditions so severe as to warrant closure of some businesses. *Draft EIS*, p. 4-63 (emphasis added).

Still, the Draft EIS blithely concludes, "Overall, the project construction period would produce business disruptions and inconveniences that can be overcome in the majority of instances but may be insurmountable for some." *Id.* As is typical of the Draft EIS, however, this conclusion is made without the benefit of any concrete analysis. There is no attempt to quantify the extent and duration of the disruption, the number of businesses affected or the potential loss of income. Instead the Draft EIS simply states, "The precise effects on businesses located along the corridor would depend upon site specific conditions and the strength of businesses at the outset of construction." *Draft EIS*, p.4-63.

For business owners along the corridor, the lead agencies' cavalier assessment of impacts provides no guarantee of economic survival during construction of the Alameda Corridor. Nor do the mitigation measures proposed in the Draft EIS likewise provide any such assurance:

> To mitigate construction-related business disruption impacts, appropriate signage will be used to direct patrons to alternate routes to businesses. Traffic management plans will be implemented to maintain access to businesses. A businesses outreach program will be implemented to inform local merchants of construction schedules which may affect their establishments. A project office hot-line will also be developed as a mechanism to answer questions related to the project.

Draft EIS, p.4-63.

"Appropriate signage" will do little, if anything, to offset construction-related impacts occurring over a three year period. Similarly, no "traffic management plan" can possibly maintain access to Compton' merchants given that the Alameda Corridor is slated to run through the heart of the City's business district. And the proposed "business outreach program" and "project office hot-line" will only serve to notify business owners of their impending economic demise.

In contrast to the vague discussion of expected impacts and proposed mitigation measures, the Draft EIS uses concrete projections of the project's primary and secondary economic benefits in an effort to extol the virtues of the Alameda Corridor. *See Draft EIS*, p.4-

63. Yet again the Draft EIS fails to provide any discussion of how these figures were derived, rendering it impossible to determine if such benefits would result as claimed.

Even assuming that such benefits would result, the Draft EIS provides no explanation why *regional* benefits must be balanced solely on the backs of the few merchants and cities bordering the proposed corridor. The fact that others stand to benefit from the proposed Alameda Corridor is little solace to those persons whose livelihoods are threatened with extinction. In this regard, conspicuously absent from the mitigation measures proposed by the federal lead agencies is any mention of compensation for owners of businesses affected by the project.

The ongoing construction of the subway in Los Angeles County by the Metropolitan Transit Authority ("MTA") provides a compelling example of the enormous problems created by large-scale urban projects. In progress since 1986, the MTA project has destroyed hundreds of businesses and disrupted thousands of lives. *See* Richard Simon, *Subway Project Leaves Trail of Anger, Lawsuits, Los Angeles Times*, Mar. 27, 1995, at A1 (recounting the myriad of problems with MTA subway project). Over one hundred owners of businesses, both large and small, have filed for relief from property taxes, "putting the subway in the same category of 'misfortune or calamity' as the earthquakes and riots." *Id.* As one merchant along the proposed MTA subway route lamented, "We never expected the construction to be more damaging than the earthquake. . . . [The MTA] is tearing peoples lives apart." *Id.*

Sadly, the federal lead agencies seem to have blatantly disregarded the lessons provided by the MTA subway project. The lead agencies need to *seriously* analyze the potential economic impacts of the proposed corridor on cities and businesses and develop *in earnest* mitigation measures which will offset such impacts.

2. Traffic Impacts

Also seriously deficient is the Draft EIS's analysis of traffic impacts associated with the Alameda Corridor Project, both during and after construction. With respect to construction, the Draft EIS states:

> Traffic parallel and perpendicular to the corridor would be impeded as a result of the loss of lanes and possible road closures during construction. Detours would be required to direct traffic around road closures, thus sending more traffic onto other streets. Although temporary road closures during construction would have the most impact on traffic, partial blockage of roadways would constrict traffic and cause congestion. Construction vehicles entering and leaving the work areas would contribute to traffic volumes. However, some traffic would be diverted to other streets due to the construction work. On-street parking would need to be temporarily prohibited on selected streets to increase the vehicle capacity on the detour routes. Access to businesses and homes adjacent to the

construction area would be impaired by road closures, blockage or driveways and traffic congestion.

Draft EIS, p.4-55.

But while acknowledging these traffic impacts, the Draft EIS nonetheless proclaims that "with thoughtful planning, the adverse effects can be reduced substantially." *Id.* The Draft EIS does not include any such "thoughtful planning," however. It merely states, "Construction management plans will be developed to identify ways to minimize traffic disruption during construction." *Id.* The Draft EIS fails to discuss the details of these traffic management plans or how these plans will mitigate construction-related traffic impacts the extent of which remain unknown.

With respect to traffic impacts resulting from the proposed corridor after construction is complete, the Draft EIS states, "Because Alameda Street would be reconstructed generally in its existing configuration, its would not attract additional traffic from other major north/south roadways in the region, as would alternatives previously considered that involved widening." *Draft EIS*, p. 4-54. Once again, this conclusion is made without any factual support. More importantly, it directly contradicts one of the specific goals of this project which is to "provide an alternative route to parallel freeways." *Draft EIS*, p.2-1.

The Draft EIS specifically notes that "t]he removal of railroad/roadway grade crossing would improve the flow of traffic on Alameda Street." *Draft EIS*, p. 4-54. Even without the benefit of any specific traffic studies, it is logical to conclude that as traffic conditions improve, Alameda Street will become an increasingly attractive alternative to the congested Los Angeles freeways for commercial traffic moving in and out of the Ports. The federal lead agencies need to study in detail the impact this increase in commercial traffic will have on the City of Compton, its residents and its businesses.

3. Cumulative Impacts

Finally, another area in which the Draft EIS is seriously deficient is in its discussion of cumulative impacts. A "cumulative impact" is defined as:

> the impact on the environment which results from the incremental impact of the action when added to other past, present, and reasonably foreseeable future actions regardless of what agency (Federal or non-Federal) or person undertakes such other actions. Cumulative impacts can result from individually minor but collectively significant actions taking place over a period of time.

40 *C.F.R.* § 1508.7.

Under NEPA, a discussion of cumulative impacts must be included as part of the EIS. 40 *C.F.R.* § 1508.25. Courts have long recognized the importance of this analysis to a legally

adequate EIS. *Roanoke River Basin Ass'n v. Hudson*, 940 F.2d 58 (4th Cir. 1991); *Sierra Club v. Watkins*, 808 F.Supp. 852 (D.D.C. 1991); and *City of Tenake Springs v. Clough*, 915 F.2d 1308 (9th Cir. 1990). There are a number of cases that also discuss the requirement of an analysis of the indirect effects of growth inducing and secondary economic effects of a project. *Sierra Club v. Marsh*, 744 F.Supp. 352 (D.Me. 1989) (secondary effect of industrial development); *Stop H-3 Ass'n v. Lewis*, 538 F.Supp. 149 (D.Haw 1982) (socioeconomic effects of new development adjacent to highway); and *Enos v. Marsh*, 769 F.2d 1363 (9th Cir. 1985) (effect of harbor on urban growth).

Reserving a scant four pages for this discussion, the Draft EIS mentions only one other project, the Ports Access Demonstration Project. Other transportation projects, such as the proposed completion of the Long Beach (I-710) Freeway, the proposed extension of the Blue Line light rail, the completion of the Red and Green line systems and other regional transportation projects are ignored completely.

Non-transportation projects are likewise ignored despite the fact that they may well have cumulative impacts and indirect effects coupled with the impacts of the Alameda Corridor Project that should be studied. The Draft EIS states that among the benefits of the Alameda Corridor Project is the fact that "economic development opportunities along the Corridor would be enhanced" and that "[t]he fundamental purpose of the Alameda Corridor is to provide a means for improved goods movement by which the adverse consequences of increased freight rail traffic can be reduced, *while at the same time sustaining economic growth.*" *Draft EIS*, at p. S-4, S-5 (emphasis added).

Increased economic growth is one of the key purposes for the Alameda Corridor Project according to the Draft EIS. However, the effects associated with that growth, and any other cumulative impacts or secondary effects are not identified. To the extent that these cumulative impacts and secondary effects are too speculative warrant detailed study, the Draft EIS fails to make any attempt to identify those impacts. Furthermore, if the cumulative impacts are too speculative to warrant analysis, it is disingenuous to not make the speculative nature of this purported growth clear when stating that this sustained or enhanced growth is a goal of the Alameda Corridor Project.

C. Environmental Justice

On February 11, 1994 President Clinton signed Executive Order 12898 directing Federal Agencies to identify and address disproportionate impacts of projects on minority and low income populations. The Executive Order states that "each federal agency shall make achieving environmental justice part of its mission. . . ." Federal agencies are required to finalize an environmental justice strategy and apply that strategy to federal projects pursuant to the Executive Order. If FHWA and FRA have identified a strategy for achieving the goals of environmental justice, those strategies are not identified in the Draft EIS. This omission makes the Draft EIS difficult to review to see if FHWA and the FRA have followed their own guidelines.

The Draft EIS devotes a scant one page discussion of environmental justice issues in the Summary section. *Draft EIS*, at p. S-30. There is no further discussion in the entire document of environmental justice and no substantive analysis of census data or impacts on various communities.

In the brief discussion in the Summary, the entire problem with the Draft EIS is summed up by the statement that "[L]and uses along the Corridor are dominated by industrial uses, however. Residences account for a small proportion of all uses along the corridor." *Draft EIS*, at p.S-30.

The Draft EIS makes no attempt to address the impacts of the Alameda Corridor Project on individual communities. By stating that the Alameda Corridor Project travels predominantly through industrial areas, the Draft EIS ignores those areas where the project impacts residences and non-industrial businesses in the same manner that the entire Draft EIS glosses over all the specific impacts of this project. The area where more residences and businesses and less industries are impacted by this Project happens to be the City of Compton.

The racial makeup of the City of Compton is: 52.7% African-American; 43.7% Hispanic; 1.7% Asian; 1.5% White; and 0.4% other races.[2/] The population of the City of Compton is overwhelmingly minority and low income: exactly the population that under Executive Order 12898 Federal Agencies are required to make an effort to identify and address project impacts. However, the Draft EIS never even analyzes the populations along the route of the Alameda Corridor Project to determine if minority and low income populations are disproportionately impacted.

The City of Compton has stated in its comments on the Draft EIR and the NOI that its community is disproportionately impacted. The Draft EIS has ignored the issue by refusing to look at the specific impacts and communities along the Alameda Corridor route. The City of Compton insists that the Federal Agencies must perform their duty under Executive Order 12898 by analyzing Corridor Project impacts on specific communities to determine if the impacts are disproportionate on residences and businesses in low income and minority areas. If that is the case, then the Federal Agencies should ensure that extra mitigations are performed in those areas. If the Federal Agencies actually fulfill the requirements of Executive Order 12898, the evidence will show that Compton's community is indeed disproportionately impacted by this Project as it is currently designed and that further mitigation is required to reduce those disproportionate impacts.

2/ Per 1990 Census data.

VI.

CONCLUSION

The City of Compton has provided FHWA, FRA and CalTrans with these comments and the attached technical comments on the Draft EIS. The essence of these comments can be summed up in Compton's frustration that its concerns and comments have never been seriously examined.

The Draft EIS is intended to be, and is required to be, a "stand alone" document that independently examines the impacts of the Alameda Corridor Project. However, the Draft EIS has incorporated an earlier EIR on the Project and accepted wholesale the conclusions reached in that document. As an independent document, the Draft EIS fails utterly and is in reality simply an extension of the earlier Final EIR.

Compton has requested repeatedly that options such as a depressed roadway and a covered truck and railway be incorporated in the Alameda Corridor Project. The response in the Draft EIS was that these options were too expensive to be considered. No studies or technical data was provided to support these conclusions. Disappointingly, the Draft EIS refused to take an independent look at these alternatives simply stating that they had already been rejected by the ACTA Governing Board. Draft EIS at p. 5-2.

The United States Environmental Protection Agency ("EPA") pointed out in its comments that the Draft EIS appeared to rely on the Final EIR failing to independently examine alternatives as required. *Draft EIS*, Appendix F. The Draft EIS response to this comment was the peculiar statement that "[T]he present EIS examines the alternatives previously discussed in the Final EIR as well as the locally preferred alternative; therefore; the choice of reasonable alternatives is not being limited." *Draft EIS* at p. 5-3.

This statement is deceptive because in actuality EPA's concerns have been realized in the Draft EIS which only studies a single project alternative: the Final EIR's "locally preferred" alternative. There is also a brief discussion of the No Build alternative and a summary of the alternatives rejected by the Final EIR; there is no independent analysis of these other alternatives.

On the Alameda Corridor Project, the Federal Agencies and CalTrans have abdicated their role in the environmental review process, acting simply as an extension of the Alameda Corridor Transportation Agency. These agencies must ensure that the Final EIS for this project independently examines the alternatives, impacts and mitigation efforts. In addition, a review of the disproportionate impacts of the Alameda Corridor Project on minority and low income communities' needs to be identified and the impacts addressed with specific mitigations designed on a community by community basis.

Because the Draft EIS blindly relied on the Final EIR it followed the EIR's mistake of solely focussing on regional issues and ignoring specific impacts on communities. While the Final EIS should begin the process of looking at alternatives and specific impacts, it probably cannot go far enough given the limits of this forum.

That is why the City of Compton specifically requests that an Alameda Corridor Project Mitigation and Enhancement Advisory Committee be formed with a mission goal of recommending mitigations and enhancements for specific communities. Forming a Mitigation Committee is not the responsibility of ACTA but is the duty of the Federal Agencies and CalTrans who will approve the Final EIS.

Without this extra effort, the Final EIS will be fatally flawed by its overreliance on the Final EIR and lack of independent analysis. This will result in an easy target for legal attack and needless delays to the Alameda Corridor Project while these obvious defects are cured. This time and effort should be spent on working together to improve the EIS and, more importantly, the Alameda Corridor Project. Compton stands ready and prepared to participate in a cooperative effort of this type to make this regional project an enhancement to each community that must host the Corridor.

TECHNICAL COMMENTS

On The

DRAFT ENVIRONMENTAL IMPACT STATEMENT

For The

ALAMEDA CORRIDOR PROJECT

Report No. FHWA-CA-EIS-95-01-D

Prepared For

THE CITY OF COMPTON

Prepared By

ULTRASYSTEMS ENVIRONMENTAL, INC.

March 27, 1995

DUE-DILIGENCE REVIEW

DRAFT ENVIRONMENTAL IMPACT STATEMENT FOR THE ALAMEDA CORRIDOR PROJECT LOS ANGELES COUNTY, CALIFORNIA

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1.0 AUTHORITY TO COMMENT

- Section 102(c) of the *National Environmental Policy Act, as amended* (42 USC 4321-4347) (NEPA) stipulates that "prior to making any detailed statement, the responsible federal official shall consult with and obtain the comments of any federal agency which has jurisdiction by law or special expertise with respect to any environmental impact involved. Copies of such statement and the *comments and views* of the appropriate federal, state, and *local agencies*, which are authorized to develop and enforce environmental standards, shall be made available to the President, the Council on Environmental Quality and to the public as provided by Section 552 of Title 5, United States Code, and shall accompany the proposal through the existing agency review process" (emphasis added). The City of Compton (City), in whose jurisdiction the proposed Alameda Corridor project is in part located, is a general law city and authorized to develop and enforce environmental standards affecting real property within the corporate boundaries of the City. As a result, the City is authorized under NEPA to submit comments upon those projects proposed within its jurisdiction which may affect said real property. The *Alameda Corridor Draft Environmental Impact Statement* (Federal Highway Administration, *et al.*, January 1995) (*DEIS*) describes such a project.

- Sections 1502.9(a) and 1503.1(a)(2) of the Council on Environmental Quality (CEQ) *Regulations for Implementing the Procedural Provisions of the National Environmental Policy Act* (40 CFR Parts 1500-1508) (*CEQ Regulations*) requires that the federal lead agency solicit and obtain comments on the "draft environmental impact statement" from a diversity of agencies, groups and organizations, including (but not limited to) "appropriate state and local agencies which are authorized to develop and enforce environmental standards" (Section 1503.1(a)(2)(I)) and "any agency which has requested that it receive statements on actions of the kind proposed" (Section 1503.1(a)(2)(I)). The City has previously commented upon the Alameda Corridor project and again states its request to continue to receive any and all notices, documents, technical reports and associated studies relative to that project more thoroughly described in the *DEIS*. The herein described comments are submitted in response to the authority provided under the *CEQ Regulations*.

- In addition, 40 CFR 1501.7(a)(1) indicates that the federal scoping process shall "invite the participation of affected federal, state, and local agencies, any affected Indian tribe, the proponent of the action, and other interested persons (including those who might not be in accord with the action on environmental grounds..." As an "affected local agency," the federal lead agencies are required under the *CEQ Regulations* to invite the agency's participation hereunder.

- As indicated in Section 1506.6(a) and (b) of the *CEQ Regulations*, federal agencies are required to "make diligent effects to involve the public" and provide notice of the

"availability of environmental documents so as to inform those persons and agencies who may be interested or affected." Based upon the efforts of the federal lead agencies in accordance therewith, the City has received notice of the availability of the the *DEIS* and, based upon that notification, submits the following comments to the federal lead agencies upon that document.

- Pursuant to Section 9(b)(6) of the Department of Transportation, Federal Railroad Administration's (FRA) *Procedures for Considering Environmental Impacts* (45 FR 40655 *et seq.*) (*FRA NEPA Guidelines*), the FRA shall "respond to all responsible comments in the final EIS in accordance with Section 13(c)(11) of this order and provide copies of the final EIS to all who commented on the draft." As further specified therein, "the program office shall consider all comments received on the draft EIS, issues raised through the citizen involvement process, and new information, and shall revise the text into a final EIS accordingly (See CEQ [Regulations, Section] 1503.4)." As authorized thereunder, the City submits the following comments and requests from the lead federal agency both receipt of a written detailed technical response to those issues, comments and inquires raised hereunder and a copy of those draft responses prior to the adoption of the final EIS.

- Pursuant to Sections 771.111(a) and (h) and 771.123(g) of the Department of Transportation, Federal Highway Administration (FHWA) *Environmental Impact and Related Procedures; Final Rule* (23 CFR 771 *et seq.*) (*FHWA NEPA Guidelines*), the FHWA authorizes both the public and governmental agencies to submit comments on draft environmental impact statements. These comments are submitted in accordance with that regulatory authorization.

- As indicated in Section 4-2.8 of Caltrans' *Environmental Handbook: Manual of Instructions, Volume I* (*Caltrans Environmental Guidelines*), Caltrans "will receive any comments [upon the draft EIS] and resolve any conflicting comments or issues..." The following comments, submitted upon the *DEIS*, identifies the existence of unresolved conflicts and require Caltrans' subsequent consideration and active involvement in the resolution of the herein described comments.

- Since all transportation improvement projects undertaken by or in behalf of State agencies or units thereof are, by definition, a part of a broader (i.e., regional; Statewide) planning program, the Alameda Corridor must be construed as a component of a larger transportation plan. As required under 23 CFR 450.210(a)(7) and 450.212, the FHWA indicates that "public involvement" is a key factor in "the Statewide planning process." As indicated therein, the "public involvement process shall be proactive and *provide complete information*, timely public notice, full public access to key decisions, and opportunities for early and *continuing involvement*" (23 CRF 450.212(a)) (emphasis added). Included therein must be "a process for demonstrating explicit consideration and response to public input during the planning and program development process" (Section 450.212(a)(5)).

- As indicated in the *DEIS*, the implementation of the proposed project will produce significant adverse environmental effects which cannot be effectively reduced or adequately mitigated through the imposition of those measures identified in either the *DEIS* or the *Final Environmental Impact Report for the Alameda Corridor, SCH No. 90011169/LAC No. 910108* (Alameda Corridor Transportation Authority, January 1993) (*FEIR*). For the "preferred project" alternative addressed in the *DEIS*, those declared "substantial" or "potentially substantial" adverse effects upon the human environment include, but may not be limited to: (1) "construction activities would produce noise that could be intrusive at some locations" (p. S-35, *DEIS*); (2) "a noise impact would be experienced at 92 residences and 2 community facilities, as a result of the project" (p. S-35), including both residential units and community facilities within the City (pp. 4-39, 4-40 and 4-42); and (3) "the proposed project would result in increased noise effects at 2 schools located along the corridor" (p. S-39). Based upon these current declarations, the City asserts that project implementation will cause actual injury to the City, its residents and business community and that such injury can or may be effectively mitigated through changes in either the project (e.g., implementation of other project alternatives; imposition of additional mitigation measures). In recognition of the *DEIS*'s draft findings, the City is authorized to both comment upon the project's environmental review record and pursue other actions as may be deemed appropriate by the City.

- In addressing the obligations imposed upon federal agencies under *Executive Order 12898* (*Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations*) (*EO 12898*), Mr. David J. Farrel, Chief of the Environmental Review Section of the United States Environmental Protection Agency (USEPA) in correspondence dated June 3, 1994 and included in Appendix F (Agency Correspondence) in the *DEIS* states that "in a transmittal memorandum for the heads of all federal agencies and departments, the President stated, 'Each federal agency shall provide opportunities for community input in the NEPA process, including identifying potential effects and mitigation measures in consultation with affected communities and improving the accessibility of meetings, crucial documents, and notices.' The DEIS should reflect, as appropriate, the requirements of EO [Executive Order] 12898." As an affected local agency, the City elects to exercise its authority under this federal action to submit comments upon the *DEIS*.

2.0 SUBMITTAL OF COMMENTS

- Although it is presently unclear whether the City is a discretionary permit authority for the proposed project, the City will clearly be a recipient of any adverse environmental effects which may ultimately manifest from the project should it be implemented. In accordance with 40 CFR 1506.1(b), "if an agency [City of Compton] is considering an application from a non-federal entity [Caltrans], and is aware that the applicant [the federal lead agencies] is

about to take an action within the agency's jurisdiction that would meet either the criteria of paragraph (a) of this section, then the agency shall promptly notify the applicant that the agency [City] will take action to insure that the objectives and procedures of NEPA are achieved." As indicated in 40 CFR 1506.1(a), the above cited actions include both the creation of adverse environmental impacts and the limitation of choices among reasonable alternatives.

- Without otherwise limiting the City's authority to submit comments to the federal lead agencies upon the *DEIS*, the City acknowledges its obligation under Section 1503.3(a) of the *CEQ Regulations* requiring that comments upon the *DEIS* "be as specific as possible and address either the adequacy of the statement or the merits of the alternatives discussed or both." In response to each of those comments provided herein, the City requests that the federal lead agencies' reply fully comply with the provisions of Section 1503.4(a) of the *CEQ Regulations*, including to Section 1503.4(a)(1) through (4) therein.

- Pursuant to the requirements of *EO 12898*, federal agencies "shall collect, maintain, and analyze information assessing and comparing environmental and human health risks borne by populations identified by race, national origin, or income. To the extent practical and appropriate, federal agencies shall use this information to determine whether their programs, policies, and activities have disproportionately high and adverse human health or environmental effects on minority populations and low-income populations" (Section 3-301, *EO 12898*). As a geographic area containing minority and low-income population characteristics, this order is directly applicable to both the City and those federal projects which may adversely affect this community. The existing *DEIS* has, by omission, grossly failed to consider, disclose and fully evaluate the potential environmental and health risk implication of the proposed action upon the City's residents and business community. Since "construction activities along the Alameda Corridor may produce a substantial adverse effect upon businesses located along the corridor" (p. 4-62, *DEIS*), the City asserts (in behalf of its affected "public") its rights and responsibilities specified in Section 5-5 of said order and formally request that the joint lead agencies ensure the full and faithful integration of "environmental justice principles into federal agency programs" and policies.

3.0 FUTURE COMMENTS

- As indicated in Section 1500.2(d) of the *CEQ Regulations,* federal agencies are required to "encourage and facilitate public involvement in decisions which affect the quality of the human environment." Since a significant percentage of the Alameda Corridor transverses the City, the City, its residents and local businesses may disproportionately experience many of the potentially adverse environmental effects associated with future federal actions to approve, conditionally approve and/or finance that transportation project.

As further required under Section 1501.7 therein, the environmental review process must involve "*an open process* for determining the scope of issues to be addressed and for identifying the significant issues related to a proposed action" (emphasis added). Webster defines "open" as "completely free from concealment; exposed to general view or knowledge."

As a result, the joint lead agencies have both a regulatory and ethical responsibility to faithfully fulfill their obligations under NEPA and its implementing guidelines, allow continuing review of all aspects of the project's environmental review record (including agency responses hereto) and to fully involve the affected community in the decision-making process.

The federal lead agencies' detailed response to the questions, comments and environmental issues raised in this technical analysis of the *DEIS* should themselves be subjected to further public review. Only by allowing additional consideration of those responses can the public be assured that all environmental impacts are addressed, all reasonable alternatives considered and all feasible mitigation measures formulated.

- The *CEQ Regulations* acknowledge the lead agency's authority to set *reasonable* time limits for the entire NEPA process, "*provided*, that the limits are consistent with the purposes of NEPA and other essential considerations of national policy" (Section 1501.8(a)) (emphasis included in citation).

  The establishment of an appropriate time period requires the lead agency's consideration of a number of factors. The City asserts that the current public comment period established for the *DEIS* is insufficient to fully comply with all applicable federal disclosure requirements based upon the following project-specific factors (and *CEQ Regulations* citations): (1) the *DEIS*'s acknowledgment that the project has the potential to produce significant unavoidable adverse impacts (Section 1501.8(b)(1)(I)); (2) the geographic extent of the proposed undertaking (Section 1501.8(b)(1)(ii)); (3) the involvement of numerous federal, State and local agencies and affected property owners (Section 1501.8(b)(1)(v)); (4) the obvious need for further analysis (Section 1501.8(b)(1)(vi)); and (5) the known level of controversy associated with the project (Section 1501.8(b)(1)(vii)). In recognition of these factors, the City requests a further extension to the public comment period to ensure that all relevant environmental issues are considered in the decision-making process. (1)

- Pursuant to Section 13(c)(9) of the *FRA NEPA Guidelines*, public and agency "comments after the stated time period expires should be considered to the extent possible." In accordance with this authorization, the City reserves the right to submit subsequent comments upon the project's environmental review record and requests that all subsequent comments be considered in the decision-making process. (2)

- As required under Section 1-103 and Section 2-2 of *EO 12898*, federal agencies are required to develop agency-wide environmental justice strategies which include such objectives as ensuring "greater public participation" among minority populations and low-income populations. This mandate is directly applicable to and complementary of the participatory obligations of NEPA and its implementing guidelines. Since the City possesses both an extensive minority population and economic characteristics inclusive of a disproportionate share of lower-income households, the City has interpreted the above cited order to impose upon FHWA/FRA a greater commitment to consider and integrate the concerns of the City's residents and business community into the planning and decision-making process. In furtherance of the intent of that order, the City requests a further opportunity to review any and all responses that the joint federal lead agencies may prepare to the comments contained herein prior to any formal action upon the EIS. That request is submitted to ensure that the issues raised herein are adequately and accurately addressed in the project's environmental review record and that future actions undertaken by federal, State and/or local agencies acknowledge and fully consider the potential impacts of those actions upon those affected populations. (3)

- As indicated in the *CEQ Regulations*, "the text of final environmental impact statements...shall normally be less than 150 pages and for proposals of unusual scope or complexity shall normally be less than 300 pages" (Section 1502.7). Those regulations further note that "environmental impact statements shall be analytic rather than encyclopedic" (Section 1502.2(a)). The combined EIS/EIR is estimated to be well over 800 pages in size and, therefore, cannot be fully digested and analyzed within that time period assigned for the review of the *DEIS*. In recognition of the size of the document, an extended time period should be provided. Should that time extension not be authorized, the lead agencies should formally and fully disclose the reasons for limiting public review upon the proposed project.

- As authorized under Section 1506.6(c)(2) of the *CEQ Regulations* and Section 771.111(h)(4)(I) of the *FHWA NEPA Guidelines*, the City requests that the federal lead agencies, following the preparation of written responses hereto, conduct an additional hearing and/or delay final actions until such time as the City is able to conduct further noticed public hearings on the proposed project and the adequacy of the environmental review record. This request is submitted in recognition of the potential environmental effects that the proposed undertaking may have upon the City, its residents and business community and will be conducted for the purpose of both conveying additional information to the federal lead agencies and soliciting additional comments therefrom concerning the project, its reasonable range of alternatives, its environmental implications and mitigation measures designed to reduce and/or avoid any adverse effects resulting therefrom. (4)

- The EIS process cannot be finalized pending receipt and inclusion in the project's environmental review record of subsequent comments from the CEQ (40 CFR 1504.1). As required under Section 309 of the federal Clean Air Act (42 USC 7609), the USEPA is required to refer to CEQ those federal actions that are "unsatisfactory from the standpoint of public health or welfare or environmental quality" (40 CFR 1504.1(b)). The substantiative nature of the project's environmental effects, outlined in Table S-1 (pp. S-32 through S-42, *DEIS*) and further described herein, require federal agency referral to the CEQ. Based upon these findings, the USEPA or other federal agency should undertake that referral.

- Have the lead agencies and/or other federal commenting or cooperating agency identified and declared its intent to notify the CEQ of its intended referral of this document pursuant to the requirement of 40 CFR 1504.3(a)? In the event that no such action has occurred to date, the City formally requests that the federal lead agencies accept this responsibility and provide notification in that manner prescribed under Section 1504 of the *CEQ Regulations*. Should the federal lead agencies disclosure its intent not to proceed with this referral, the City formally requests a public declaration of that intention so that the City and other affected agencies and individuals can independently proceed with notification as authorized under 40 CFR 1504.3(e) thereunder.

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4.0 GENERAL COMMENTS

- Pursuant to Section 1502.9(a) of the *CEQ Regulations*, "if a draft statement is so inadequate as to preclude meaningful analysis, the [federal lead] agency shall prepare and circulate a revised draft of the appropriate portion." As indicated by the nature and extent of comments provided herein, the City is precluded from the submittal of meaningful comments upon the *DEIS* based upon the complexity of the project, the overly cumbersome format presented in the *DEIS* and the technical deficiencies of that document. The City further concludes that substantial augmentation of the *DEIS* will be required to address those concerns, issues and requests for further analysis as presented herein. As a result, the City requests that the federal lead agencies both thoroughly address the City's comments and recirculate an amended *DEIS* which fully addresses the direct, indirect and cumulative environmental effects associated with the proposed project.

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- As indicated in Section 1502.9(c)(ii) of the *CEQ Regulations,* Sections 771.130(a)(2) of the *FHWA NEPA Guidelines* and Section 3-6 of the *Caltrans Environmental Guidelines,* agencies are directed to prepare supplements to draft environmental impact statements if and when "there are significant *new circumstances or information* relevant to environmental concerns and bearing on the proposed action or its impacts" (emphasis added). The agencies' response to the issues raised herein will constitute significant new information and, therefore, necessitate either recirculation of the *DEIS* and/or preparation of supplemental documentation.

- Section 13(e) of the *FRA NEPA Guidelines* requires that "where in the development of an FRA action for which a draft or final EIS has been prepared, a significant change is made which would alter environmental impacts, or where *significant new information* becomes available regarding the environmental impacts of such an FRA action, the FRA program office shall prepare an appropriate supplement to the original draft or final EIS for that portion of the FRA action affected" (emphasis added). A detailed technical response to each of the issues, concerns and inquiries delineated herein would constitute "significant new information" as defined in or intended by the above citation. (1)

- In undertaking the City's review of the *DEIS*, the City has not independently conducted focused technical studies to validate (or invalidate) the conclusions and assertions presented therein. The requirements of NEPA and its implementing guidelines and related laws and authorities place the obligation for the adequacy of the technical analyses upon the federal lead agencies and not upon the affected public. As a result, the focus of the City's comments are intended to direct the lead agencies toward those issues where, in the opinion of the City, further technical review is required or deemed appropriate to ensure a full disclosure of the project's environmental implications. Although these comments may not, themselves, present significant new information as required under Section 1502.9(c)(ii) of the *CEQ Regulations* and Section 13(e) of the *FRA NEPA Guidelines* for the preparation of supplemental environmental documentation, the federal lead agencies' responses hereto (Section 1502.9(b), *CEQ Regulations*) will introduce both new environmental issues and alter the agencies' conclusions concerning the significance or potential significance of those environmental consequences.

- As indicated in the *CEQ Regulations*, the alternatives analysis "is the heart of the environmental impact statement" (Section 1502.14). That analysis "should present the environmental impacts of the proposal and the alternatives in comparative form, thus *sharply defining the issues and providing a clear basis for choice* among options by decision-makers and the public" (*Ibid*) (emphasis added). As presently drafted, the *DEIS* neither presents nor "rigorously explores" (Section 1502.14(a)) a reasonable range of definable options, including "reasonable alternatives not within the jurisdiction of the lead agency" (Section 1502.14(c)) which constitute clear choices among separate and distinct development choices. Not only has the City's recommended alternatives, as indicated in previous correspondence to the federal lead agencies and included in Appendix E of the *DEIS*, been rejected without any supportive objective analysis defending that action, but other obvious alternatives (e.g., redirect cargo to alternative port facilities; expansion of staging areas in proximity to the San Pedro Bay Ports; increased reliance upon truck transport over rail service; multi-modal use of the corridor) have not been considered in whole or in part in the EIS. The limited selection between only the preferred project and the "no build" alternative does not provide "a clear basis for choice" and, therefore, does not fulfil the intent of NEPA. (2)

- As required under 40 CFR 1502.2(g), "environmental impact statements shall serve as the means of assessing the environmental impact of proposed agency actions, *rather than justifying decisions already made*" (emphasis added). Based upon the *DEIS*'s limited range of project options (i.e., preferred project, no build alternative), it appears evident to the City that a predetermination has been made by FHWA/FRA to undertake the "preferred project." The actions of the federal lead agencies, as represented through by the inadequacies of the *DEIS*, reflect a failure to comply with this obligation. (3)

  The USEPA, in correspondence from Mr. David J. Farrel, Chief, Environmental Review Section to the federal lead agencies dated February 24, 1994 (included in Appendix F of the *DEIS*), that federal agency indicates "that by selecting an alternative for implementation, the NEPA process may be prejudiced on the basis of the project proponent's taking an interim action which could "determine subsequent development or limit alternatives [40 CFR 1506.1(3)]."

- NEPA's purpose is not to generate paperwork (even excellent paperwork), but to foster excellent action. The NEPA process is intended to help agencies make important decisions based on a clear understanding of the environmental consequences of those actions and to take actions that best protect, restore and enhance the environment (40 CFR 1500.1(c)). Fulfillment of NEPA, therefore, necessitates that the environmental review record present an adequate analysis of both the project's potential environmental effects, but the comparable effects of other alternative actions which may accomplish the same or similar project objective, but at a lower environmental cost (to the human environment). The document now presented for public review fails to fulfill this basic purpose of NEPA.

- As required under Section 1502.22 of the *CEQ Regulations*, the lead agency is obligated to develop and/or otherwise furnish incomplete or currently unavailable information "if the incomplete information [is] relevant to reasonably foreseeable significant adverse impacts [or] is essential to a reasoned choice among alternatives and the overall cost of obtaining it are not exorbitant." Notwithstanding this analytical obligation, the federal lead agencies have elected to both defer the generation of that material and derive unsupportable conclusions in the absence of that information (e.g., "data on rail accidents in general and rail accidents involving releases of hazardous substances in particular are incomplete," p. 3-46; "the nature and extent of potential contamination is not currently known," p. 4-25; "as the beginning of construction nears, specific disposal sites and truck routes for hauling dirt will be determined," p. 2-43; since "the western edge of this floodplain cannot be known with certainty, it is possible that the corridor is not located within the floodplain in this reach," p. 4-26; "an emergency response plan will be developed and approved prior to operation of the proposed project," p. 4-29; "a further analysis of the vibration potential at this location [Alameda and Santa Ana Boulevard] will be conducted, p 4-47). This election appears contrary to the intent of NEPA, prevents a concerned citizenry from fully understanding the (4)

agencies' supportive bases for its actions, and forecloses opportunities for a full and faithful disclosure of all potential project-related impacts. (4)

- As indicated in Section 1505.1(e) of the *CEQ Regulations*, "if another decision document accompanies the relevant environmental documents to the decision-makers, [federal lead] agencies are encouraged to make available to the public before the decision is made any part of that document that relates to the comparison of alternatives." In fulfillment therewith, the City requests that any additional "decision document" be transmitted to the City prior to the federal lead agencies taking any action upon the proposed project and that said document(s) be included as part of a broad-based solicitation of public and agency comments upon the *DEIS*, as required under and in compliance with NEPA. (5)

- Pursuant to Section 771.109(b) of the *FHWA NEPA Guidelines*, the FHWA is responsible for the implementation of "those mitigation measures stated as commitments in the environmental documents prepared pursuant to this regulation. The FHWA will *assure* that this is accomplished as part of its program management responsibilities..." (emphasis added). Since the post-mitigated effects identified in the *DEIS* are dependent upon the effective and timely implementation of those measures recommended therein, it is incumbent upon the FHWA to both ensure that all measures are enforced and monitored throughout the construction and operational life of the project. Since there exists no obligation under NEPA for the federal lead agencies to adopt the mitigation measures identified in the *DEIS* or subsequently added thereto, the *DEIS* should disclose the potential post-mitigated effects that can be reasonably anticipated should all or some of the recommended measures not be adopted (and implemented). In order to provided an apprehensive citizenry with assurance that post-mitigated conditions will be as represented, the FHWA should disclose, as part of the environmental review record, its plans and procedures which are to be effectuated to enforce those measures which are subsequently adopted as conditions of project approval. (6)

- Since the federal lead agencies are not obligated to present a detailed mitigation plan in the *DEIS* or commit to implementing mitigation measures, it is not possible to conclude the ultimate condition of the post-mitigated project environment without a formal declaration of the federal lead agencies intent to adopt (as conditions of project approval) those recommended measures as stated in both the *FEIR* and *DEIS*.

  Although the *DEIS* indicates that "the analysis reported in the EIR is a part of this EIS" (p. 3-1), no corresponding declaration is provided that the *FEIR*'s mitigation measures are also "a part of this EIS." Referencing the NEPA guidelines of the federal lead agencies, does the FHWA or the FRA (or Caltrans) have a statutory or regulatory obligation to adopt, monitor and enforce those mitigation measures identified therein? (7)

- Not all of the significant or potentially significant adverse environmental impacts identified (8)

in the text of the *DEIS* are included in Table S-1 (Alameda Corridor Summary of Impacts) (p. S-32 *et seq.*, *DEIS*) therein. Additionally, not all of the topical issues (e.g., hazardous materials) are referenced and summarized therein. For example, the *DEIS* acknowledges that workers "would be at risk" (p. 4-25) unless "all construction activities within the three channels would be scheduled outside of the winter flood season, defined as the period between October 15 and April 15" (p. 4-29), neither this declared impact nor recommended mitigation measure are referenced in Table S-1. Similarly, although the *DEIS* indicates that "an emergency response plan will be developed to respond to emergencies" (p. 4-32), neither this action nor the entire topical issue (i.e., hazardous materials) is acknowledged in the Table S-1. (8)

This failure to accurately summary (in the summary table) both those potentially significant environmental impacts described in the text and the mitigation measures which are recommended under each of the topical issues, infers a failure on the part of the federal lead agencies to comply with the disclosure requirements of 40 CFR 1502.12 (and the federal lead agencies' corresponding environmental guidelines) and fails to provide decision-makers with a full representation of the range of mitigation measures identified in the EIS.

- Section 1503.2 of the *CEQ Regulations* state that "federal agencies with jurisdiction by law or special expertise with respect to any environmental impact involved and agencies which are authorized to develop and enforce environmental standards *shall* comment on statements within their jurisdiction, expertise, or authority. Agencies *shall* comment within the time period specified..." (emphasis added). As indicated in the *DEIS*, both the United States Department of the Army Corps of Engineers (USACOE) and Interstate Commerce Commission are identified as other federal agencies from whom permits or related entitlements may be required (p. S-28, *DEIS*). Additionally, the document indicates that "pending SHPO [State Historic Preservation Officer] concurrence and no objections from the ACHP [Advisory Council on Historic Preservation]..." (p. 4-21), thereby indicating that other federal agencies will be involved with the proposed project. Based upon that listing of commenting agencies identified in Appendix E therein, no evidence is provided documenting compliance (by other federal agencies) with this obligation. (9)

- Based upon the combined joint lead agency status of two federal agencies (i.e., FHWA, FRA) and the involvement of a State agency (i.e., Caltrans), the environmental regulations governing each of those agencies would appear to equally apply to the preparation and processing of the EIS. Should procedural or related conflicts exist between the policies and practices of those agencies, one or more agency regulations and/or guidelines would logically preempt the related regulations or guidelines of the other agencies. For the purpose of this EIS, which agency's regulations, guidelines and associated policies have been utilized in the preparation of this document? Have any internal conflicts among those regulations, guidelines and associated policies of the federal lead agencies been identified and, if so (10)

identified, how have those conflicts been resolved (40 CFR 1506.2(d))?

(1)

- As indicated in the *DEIS*, "the Federal Highway Administration and the Federal Railroad Administration are serving as joint lead agencies" (p. S-26) for this project. In addition, Caltrans is listed both on the cover of the *DEIS* and identified in the *Memorandum of Understanding among the Federal Highway Administration, the Federal Railroad Administration, and the California Department of Transportation* (included in Appendix F of the *DEIS*) as "responsible for the coordination and oversight of appropriate environmental studies and necessary technical analysis, and for coordinating preparation of environmental documents, including, but not limited to, agency and public involvement, notification, and coordination with affected agencies and the public." Except for the *Notice of Intent* (included in Appendix G of the *DEIS*), wherein the address and contact person for the FHWA is identified, nowhere in the document is there a list of contact parties to whom questions can be addressed and comments transmitted. This failure to facilitate public and agency comments effectively limits the public's ability to formally comment upon the project's environmental review record and, thereby, restricts public access to the decision-making process.

(11)

- Although the statutes and regulations applicable to the *California Environmental Quality Act* (CEQA) are not directly relevant to the preparation and processing of the *DEIS,* that document and the information contained in the *FEIR* has been referenced in the *DEIS* (e.g., the EIR "is a part of this EIS and is included as a companion volume to this EIS," p. S-29; "the analysis reported in the EIR is a part of the EIS," p. 3-1).

  The *FEIR*, however, is neither specifically referenced as a technical appendix in the *DEIS* nor publicly circulated as a companion document thereto. In the absence of those actions, the *DEIS* merely references an earlier environmental study which is not immediately available to those groups or organizations who may elect to comment on this NEPA document. In the absence of a tangible linkage between the *DEIS* and *FEIR*, the *FEIR* should be given no more weight that any other technical reference presented in a scientific analysis and should, itself, be subject to additional peer review.

(12)

  The City further asserts that since the *FEIR* was not represented as a joint planning or environmental document within the meaning of 40 CFR 1506.2 and 1506.4; therefore, the *DEIS* must be examined as a stand-alone document. The information presented therein must both fully comply with NEPA disclosure requirements and independently provide a meaningful level of scientific inquiry. As identified herein, in the absence of the *FEIR*, the *DEIS* fails to fulfill either disclosure obligation.

- The CEQA process and the resulting *FEIR* is not the "functional equivalent" of the NEPA process and its resulting final EIS. Although the United States Environmental Protection

Agency is exempt from strict compliance with NEPA when it engages in most regulatory actions designed to protect the environment, that same authority does not apply to FHWA and FRA. The federal lead agencies are, therefore, precluded from utilizing the previous CEQA analysis in lieu of full compliance with all analytical and procedural obligations established under NEPA and its implementing guidelines and regulations.

- As indicated in 40 CFR 1506.3(a), "an agency may adopt a federal draft or final environmental impact statement or portion thereof *provided that the statement or portion thereof meets the standards for an adequate statement under these regulations*" (emphasis added). The *FEIR* is neither an "environmental impact statement" in accordance with the above citation nor does that document adequately fulfill the requirements thereunder. As a result, no authority is provided the federal lead agencies to utilize the *FEIR* in fulfillment of all or part of its disclosure obligations under NEPA. (12)

- Since the *FEIR* did not specifically address the preferred alternative indicated in the *DEIS* (i.e., Alternative 2.1B), the analysis, findings and mitigation measures contained in the *FEIR* do not appear directly applicable to the project, as revised. Over-reliance upon the previous CEQA analysis may, therefore, result in a misrepresentation of the project's direct, indirect and cumulative environmental impacts. (13)

- Based upon the substantiative differences between Alternative 2.1A (as addressed in the *FEIR*) and Alternative 2.1B (as identified in the *DEIS*), the two development options should be considered to be two independent scenarios and not merely variations of the same project alternative. As a result, it is not sufficient to limit the extent of the environmental analysis of Alternative 2.1B to only a minimalistic attempt to portray its direct, indirect and cumulative consequences within the *DEIS* (and rely upon information previously described in the *FEIR* for Alternative 2.1A). Pursuant to Section 1505.1(e) of the *CEQ Regulations*, the federal lead agencies are precluded from selecting a project alternative unless that alternative is adequately discussed and evaluated in the EIS. Based upon the current inadequacies of the *DEIS*'s evaluation of Alternative 2.1B, the federal lead agencies are precluded from selecting that alternative pending further examination of that project option. (14)

- Although the *FEIR* has been previously certified, its reference in the *DEIS* allows the public and commenting agencies to raise substantiative issues which, in the judgement of those parties, are not adequately addressed therein, notwithstanding whether those parties previously commented on the CEQA documentation or the existence of any lead agency responses included within that earlier document.

- As indicated in 40 CFR 1502.21, "no material may be incorporated by reference unless it is reasonably available for inspection by potentially interested persons within the time allowed for comment." As indicated in the "preface" of the *FEIR*, a number of relevant documents (15)

are cited therein which were not circulated with the *FEIR* or made available to the City through the circulation of the *DEIS*. Of particular relevancy is the document entitled *Appendix A: Highway Capacity and Level-of-Service Analysis* (DMJM/M&N and DKS & Associates, 1992) which forms the basis for the analysis of level-of-service (LOS) upon the affected roadway system. In the absence of that technical study, the City has no independent basis to evaluate either the adequacy of the traffic analysis or the validity of the conclusions provided in either the *FEIR* or *DEIS*.

In comparing NEPA obligations concerning "appendices" and "incorporated by reference," 46 FR 18026 *et seq.* (*Memorandum: Forty Most Asked Questions Concerning CEQ's NEPA Regulations*) states, "the appendix accompanies the EIS, whereas the material which is incorporated by reference does not accompany the EIS. Thus, the appendix should contain information that the reviewers will be likely to want to examine. The appendix should include material that pertains to preparation of a particular EIS. Research papers directly relevant to the proposal, lists of affected species, discussions of the *methodology or models used in the analysis* of impacts, extremely detailed responses to comments, or other information, would be placed in the appendix. *The appendix must be complete and available at the time the EIS is filed*...If the appendix is too bulky to be circulated, it instead *must be placed in conveniently accessible locations or furnished directly to commentors upon request.* If it is not circulated with the EIS, the Notice of Availability published by EPA must so state, giving a telephone number to enable commentors to locate or request copies of the appendix promptly" (emphasis added). (15)

The above citation further states that "material that is not directly related to preparation of the EIS should be incorporated by reference." Based upon its relationship to the proposed project, the *FEIR* should not be "incorporated by reference" but should be identified as a technical "appendix" to the *DEIS*.

By this reference, the City formally requests receipt of a copy of both the above referenced study and all additional technical studies either reference in the "preface" or the *FEIR* or listed among the technical appendices in the *FEIR* and *DEIS*. Additionally, since that material was not circulated with the *DEIS*, the City requests an extension to the *DEIS* review period to conduct a thorough assessment of that material. In the absence of both that document distribution and time extension, the *FEIR* cannot be "incorporated by reference" pursuant to 40 CFR 1502.21 since the requested materials were not made "available for inspection by potentially interested persons within the time allowed for comment." If the *FEIR* was thereby removed from the project's environmental review record (based upon the federal lead agencies to comply with these provisions), the federal lead agencies should comment upon whether the resulting documentation adequately addresses the proposed project and fully complies with the agencies' NEPA obligations.

Note: Public libraries in a number of communities adjoining the Alameda Corridor right-of-way were contacted in an attempt to either secure or review a complete copy of the DEIS, FEIR and each of the technical appendices referenced therein (e.g., Appendix A: Highway Capacity and Level-of-Service Analysis, FEIR). The following municipal and/or County public libraries did not have, on file, a copy of any of the documents comprising the project's environmental review record: (1) City of Bell; (2) City of Bell Gardens; (3) City of Commerce; (4) City of Cudahy; (5) City of Downey; (6) City of Gardena; (7) City of Hawthorne; (8) City of Inglewood; (9) City of Lakewood; (10) City of Lawndale; (11) City of Long Beach; (12) City of Lynwood; (13) City of Maywood; (14) City of Paramount; (15) City of Rolling Hills; (16) City of Rolling Hills Estates; (17) City of Signal Hill; (18) City of South Gate; and (19) community of San Pedro. By failing to facilitate broad public access to the project's environmental review record, the federal lead agencies have limited opportunities for informed public review and have effectively restricted the ability of those individuals affected by the project to participate in the decision-making process. (15)

In attempting to secure a copy of the above referenced technical report from the environmental consulting firm contracted to prepare the FEIR, representatives of the City were notified that a copy of that report could only be secured through the payment of any and all costs incurred in the reproduction of that document. Alternatively, a copy could be reviewed in the office of that consultant (located external to the City) but could not be "checked-out" or removed from that office. The environmental consultant further noted that no free parking was available and that any costs associated therewith would be the obligation of the reviewer. By these actions, the City's access to important technical information was limited; thereby, precluding the City's ability to fully respond to the analysis contained therein. This lack of access and financial obligation imposed upon a concerned and affected citizenry is contrary to the full disclosure provisions of NEPA and other relevant federal requirements.

- As required under Section 1502.10 of the *CEQ Regulations*, the EIS document format should be selected to "encourage good analysis and clear presentation of alternatives." The use of substantial references to the *FEIR*, whether assumed to be included in the *DEIS*, described only as an independent reference document or incorporated by reference (40 CFR 1502.21), is both extremely confusing and precludes even a trained reader from understanding project-related (and cumulative) impacts and from conducting a comparative analysis of both the project and project alternatives. Rather than presenting such a cumbersome format, which confuses more than illuminates, the *DEIS* should be redrafted in a manner more closely representative of typical NEPA documents. (16)

- The document is poorly formatted and internally inconsistent. For example: (1) the sequence of topical issues presented in the summary table (p. S-32 *et seq.*, *DEIS*) do not correspond with the sequence of topical issues presented in the text of the *DEIS*; (2)some of the topical

analyses presented therein include both a section on existing "setting" and "impact" analysis, while other sections are differently formatted; (3) some sections place operational impacts before construction impacts (e.g., noise) while other sections place construction impacts before operational effects (e.g., energy); (4) some sections (e.g., hydrology and water quality) place both construction and operational impacts before mitigation measures while other sections split these project components so that the recommended mitigation measures trails directly behind the impact analysis; (5) some sections combine the impact and mitigation into a single heading (e.g., energy); (6) some sections list "significance criteria" while other do not; and (7) not all sections address the "no build" alternative (as required by NEPA). To assist agencies and the public fully understand the project's potential effects, the *DEIS* should be presented in a consistent, user-friendly manner consistent with Section 1502.10 of the *CEQ Regulations*. (16)

- The evaluation of project-related and cumulative environmental impacts must be undertaken both in accordance with a defensible analytical methodology and subsequently judged in accordance with a rational and justifiable threshold standard which is clearly articulated in the *DEIS* and subjected to public and agency evaluation. By failing to identify the threshold criteria against which potential environmental effects are measured, the public and affected agencies have effective means to either support or refute the position of the federal lead agencies. As defined under 40 CFR 1508.27, "significance" must be determined in the context in which the impact will occur and the intensity of the action. Based upon the factors identified therein, the federal lead agencies have an obligation to formally establish and communicate the values that those agencies have established to ensure the objectivity of this environmental analysis. Pending a precise quantitative or qualitative definition of those values, for each of the topical issues and environmental effects identified in the *DEIS*, the federal lead agencies have not fully complied with Section 101(d) of NEPA which requires accountability on the part of those agencies "for the scope, *objectivity*, and content of the entire [environmental impact] statement" (emphasis added). The City, therefore, requests that the federal lead agencies formally state the criteria that they have utilized to determine the "significance" or "substantial" nature of all potential environmental impacts identified in the *DEIS* or subsequently analysis as a result of comments thereupon. (17)

  For example, the *DEIS* discloses the potential for surface water contamination in the event of an accidental discharge in proximity to those regional storm drain conduits located in proximity to the proposed right-of-way. The *DEIS* then states that "this is not regarded as a substantial adverse effect, however, because the likelihood of a major spill producing this situation would be low" (pp. 4-25 and 4-26). Based upon this statement, the probability of occurrence is, itself, a threshold criteria. If so established, what level of probability is deemed to be "significant"?

- To the extent feasible, all threshold criteria should be structured either quantitatively or

qualitatively to ensure the objectivity in there application and evaluation. Threshold standards should be based upon declared public policy and/or scientifically supportable assumptions and the basis for those standards identified through reference to the supporting documentation. Separate threshold standards should be established for cumulative environmental impacts. (17)

- The *DEIS* incorporates excessive use of complex technical jargon and terminology which is not immediately understandable to the general public and, therefore, fails to fulfill its principal obligation as an informational document readily accessible (and understandable) to both the project's decision-makers and to those individuals and organizations who will experience the greatest adverse environmental impacts attributable to the project (40 CFR 1502.8). In this fashion, the *DEIS* limits both the number and range of technical responses that are formulated and submitted to the federal lead agencies. For example, the document utilizes acronyms when referencing public agencies (e.g., "ACHP," p. 4-21); however, not all references are either initially defined or included in the "glossary" of the *DEIS*. (18)

- Much of the document is cryptic and does not provide the reader with either methodology or the assumptions used in the analysis. This is especially prevalent in the air quality and noise sections as discussed in the following comments for each of these sections, respectively. All calculations and model runs should be placed in appendices for verification of both the methodology and assumptions.

- Although no significant environmental impacts are identified or predicted, a number of sections within the *DEIS* propose mitigation measures (e.g., "as compared to the No Build Alternative, the proposed project would reduce the potential for substantial accidents related to train accidents. Nevertheless, mitigation measures to effectively manage potential safety/security problems associated with the Corridor will be implemented as described below...," p. 4-60). If no project-related or cumulative impacts are predicted, the rationale for recommending mitigation measures should be explained. Additionally, any the *DEIS* should differentiate between recommended mitigation measures and operational characteristics or commitments attributable to the proposed activity in accordance with established procedures or regulatory obligations. (19)

  For example, the *DEIS* indicates that "an emergency response plan will be developed to respond to emergencies" (p. 4-32). It is unclear whether this statement references a proposed mitigation measure or whether the resulting "emergency response plan" is part of either the project description or an operational component thereof. Similarly, the *DEIS* indicates that surface water contamination will necessitate "collection and treatment facilities, including oil-water separators, [which] will be provided as part of the project" (p. 4-28). Neither of these actions are specifically formulated as mitigation measure (and included in Table S-1); therefore, a reader is left to infer that these (and other) activities are part of the project

description. The mere inclusion of these statements in *the DEIS* does not, however, ensure their subsequent incorporation into the project's design or operational procedures. Additionally, their inclusion does not guarantee their effective operation. (19)

- As required under Section 1502.10 of the *CEQ Regulations*, the EIS document format should be selected to "encourage good analysis and clear presentation of alternatives;" however, many topical sections of the *DEIS* do not provide a quantitative or even qualitative analysis of the residual impact after application of the proposed mitigation measure (e.g., Section 4.7.13.1, Small Business Disruption During Construction). This failure to present the supportive rationale for the document's conclusions is inconsistent with the requirements of Section 1502.24 of the *CEQ Regulations* (i.e., "agencies shall insure the professional integrity, including scientific integrity, of the discussions and analysis in environmental impact statements. They shall identify any methodologies used and shall make explicit reference by footnote to the scientific and other sources relied upon for conclusions in the statement. An agency may place discussion of methodology in an appendix"). (20)

- Throughout the document, the project is referred to as the "locally preferred alternative" and "proposed project." In accordance with NEPA guidelines, it would appear that the correct terminology would be the "proposed action." Similarly, the "no build" and "no project" alternatives (used interchangeably throughout the document) should be referred to as the "no action alternative." (21)

- Many sections give far too little discussion of the "no build" alternative and do not draw comparisons between this alternative and the "preferred project" alternative as required by NEPA. (22)

- The *DEIS* acknowledges that "there is ongoing development of intercity and passenger commuter rail service that has begun and is expected to continue" (p. 2-21). The *DEIS* further indicates that "the MTA [Metropolitan Transportation Authority] is currently engaged in an ambitious program to acquire existing rail lines providing access to major trip attactors" (p. 2-22). Despite these comments, the *DEIS* fails to explore the potential multiple use of the Alameda Corridor as both a freight route and an integral component of a regional fixed-rail public transit system. This single purpose focus is unconscionable in light of other regional efforts to address the combined problems of mobility, air quality and resource conservation. (23)

- The *DEIS* states that "the proposed project involves highway and railroad improvements, but does not include a transit component" (p. S-29). Nothwithstanding this comment, it is unclear why a "transit component" has not be considered? Although the lead agencies are prepared to spend $1.8 billion" (p. S-26) to transport freight through a densely populated area, no benefit is perceived in also moving people along that same transportation corridor.

Much of what purportedly is represented to be an objective analysis is only a one-sided attempt to espouse the perceived benefits of this project, while under-playing the significant adverse effects that will be experienced by those communities which align that right-of-way. The City sees no or only limited inherent benefit to its citizens and business interests. Local jobs will not be expanded and residents will not be provided improved access to regional marketplaces. By expanding the project description to incorporate increased access to public transit opportunities (in combination with the proposed use), the proposed Alameda Corridor may begin to become beneficial to the affected local communities which align that right-of-way. As a result, a mixed freight/passenger alternative should be identified and evaluated as an additional project alternative in a recirculated *DEIS*. (23)

The inclusion of a "mass transit" alternative is specifically required under Section V(E)(3) of the *FHWA Technical Advisory T 6640.8A* (October 30, 1987).

- The *DEIS* references a number of technical reports which were utilized as part of the analysis presented in that environmental impact statement (e.g., *Phase I Environmental Site Assessment*, MAA Engineering Consultants, 1991; *Phase II Environmental Site Investigation*, Leighton and Associates, 1993, p. 3-36). Those and other referenced reports are, however, not included in a technical appendices to the *DEIS*, circulated with that document or provided to public libraries where they can be reviewed. Similarly, no statement is provided in the *DEIS* indicating where those documents can be obtained, reviewed or copied. All technical studies, not now in the public domain, should be included as part of the *DEIS* so that independent reviewers can determine whether the information presented in the *DEIS* is an accurate summation of that material, what limitations (or assumptions) were utilized or stated therein, whether the project-specific investigations involve all or a portion of the project area and whether all recommended mitigation measures have been included therein (e.g., measures recommending the preparation of additional technical analysis) (40 CFR 1502.21). (24)

- The *DEIS* should identify the "environmentally preferable" alternative (i.e., the alternative which best promotes the national environmental policy expressed in NEPA) from the range of alternatives identified in both the *DEIS* and *FEIR* (e.g., Alternative 2.1A) and, if different from the "preferred project," present the federal lead agencies' overriding reasons why the proposed action is warranted notwithstanding the availability of an "environmentally preferable" alternative. (25)

5.0 NATIONAL ENVIRONMENTAL POLICY ACT

- As indicated in Section 101(d) of NEPA, "the provisions of this subparagraph shall not relieve the federal official of his responsibilities for the scope, *objectivity*, and content of the (1)

entire [environmental impact] statement or of any other responsibility under this Act" (emphasis added). Similarly, Section 1502.1 of the *CEQ Regulations* indicates that the purpose of an EIS is to "provide *full and fair discussion* of significant environmental impacts and inform decision-makers and the public of the reasonable alternatives which would avoid or minimize adverse impact or enhance the quality of the human environment" (emphasis added).

The importance of these citations center upon the obligation of federal agencies to provide an objective and impartial analysis of the potential environmental consequences of their actions. As presently structured, the *DEIS*'s focus: (1) limits its objective analysis of other potential development scenarios which, if implemented, may have a greater ability to "achieve a balance between population and resource use which will permit high standards of living and a wide sharing of life's amenities" (Section 101, NEPA); and (2) limits a full and fair analysis of the potentially adverse consequences of that action. As required under Section 1502.2 of the *CEQ Regulations*, EISs "shall state how alternatives considered in it and decisions based on it will or will not achieve the requirements of Sections 101 and 102(1) of the [National Environmental Policy] Act and other environmental laws and policies. The *DEIS*, by focusing upon a preferred alternative and not including an analysis of a range of "reasonable alternative," has failed to present a balanced analysis of other potential development scenarios and has, therefore, not fully complied with the requirements imposed under the above citation. (1)

Despite the City's requests for an analysis of additional project alternatives which may minimize or avoid identified effects upon the City, its residents and business community, the joint lead agencies have failed to provide, for public review and comment, a range of reasonable project alternatives which reflect clear and distinct choices regarding the proposed endeavor. This off-handed disregard for the City's request for an expanded alternatives analysis, compounded with a lack of objective analysis which presents a defensible rational in support of the lead agencies' election not to evaluate the City's requested alternative, appears counter to the intent and requirements of NEPA.

- As indicated in the *DEIS*, the two alternatives that are considered in detail in this EIS are: (1) the "no build" alternative; and (2) Alternative 2.1B (defined as a modification of Alternative 2.1A), "which emerged from the Concept Engineering/CEQA process as the locally preferred alternative" (p. S-11). As further described in the *DEIS*, the "no build alternative" constitutes the retention of existing railroad operations and roadway conditions. The limited selection between the "no build" alternative and the "preferred project" has produced an environmental analysis in with the only two options involve building the project as now proposed or doing nothing. The choices presented by the federal lead agencies appear contradictory to Section 1502.2(g) of the *CEQ Regulations* which state that the "environmental impact statement shall serve as the means of assessing the environmental impact of proposed agency actions, rather

than justifying decisions already made."

- As indicated in Section 1500.2(b) of the *CEQ Regulations*, "environmental impact statements shall be *concise, clear, and to the point, and shall be supported by evidence* that agencies have made the necessary environmental analysis" (emphasis added). As more thoroughly discussed herein, the *DEIS* presents generalization concerning potential environmental impacts, providing unsupportable and often contradictory conclusions in lieu of the "systematic, interdisciplinary approach which will insure the integrated use of the natural and social sciences and the environmental design arts in planning and in decision-making" (Section 102(A), NEPA). (2)

- Under Section 1500.2(c) of the *CEQ Regulations*, federal agencies shall "integrate the requirements of NEPA with other planning and *environmental review procedures* required by law or by agency practice so that all procedures run concurrently rather than consecutively" (emphasis added). As described herein, it is presently the opinion of the City that the federal lead agencies have failed to fully comply with both the procedural and analytical requirements imposed upon those joint lead agencies under NEPA, *CEQ Regulations* and agency-specific NEPA guidelines. Additionally, since the CEQA process was conducted independently of the NEPA analysis, the federal lead agencies are precluded by the above provisions from basing their environmental findings upon an earlier environmental compliance document which was not prepared pursuant to the requirements of NEPA or its implementing guidelines. (3)

- Federal agencies are directed to "use the NEPA process to identify and assess the reasonable alternatives to proposed actions that will *avoid or minimize adverse effects* of these actions upon the quality of the human environment" (Section 1500.2(e), *CEQ Regulations*) (emphasis added). In order to accomplish this requirement, the range of alternatives subjected to "systematic, interdisciplinary" analysis must incorporate development options and design concepts which produce lower-level impacts (i.e., "avoid or minimize") that attributable to the lead agencies' preferred project. Although a number of alternatives are identified in the *DEIS*, all but two alternatives (i.e., "no build" alternative; preferred project) are summarily dismissed and not subjected to further environmental analysis therein. The options which are analyzed do not include a reasonable range of distinct alternatives (as required under Section 1501.2(c) of the *CEQ Regulations*) which constitute clearly differentiated approaches and "environmentally different alternatives" (Section 1502.23, *CEQ Regulations*) designed to address those demand requirements which purportedly predicate the development of the proposed project. (4)

- As more thoroughly described herein, the *DEIS* should be expanded to discuss a number of additional topical issues which are not presently included as part of the existing NEPA analyses. Authorization for an expanded analysis is contained in Section 1501.7(c) of the (5)

CEQ Regulations which states that "an agency shall revise the determinations made under paragraphs (a) and (b) of this section if substantial changes are made later in the proposed action, or if *significant new circumstances* or information arise which bear on the proposal or its impacts" (emphasis added). Since the 4-lane preferred project addressed in the *DEIS* (Alternative 2.1B) will convey substantially less traffic than the 6-lane preferred project analyzed in the *FEIR* (Alternative 2.1A), the traffic impacts associated with a reduced-flow alternative will be substantially greater than those corresponding effects produced by a similar roadway with additional travel lanes.

The declaration in the *FEIR* that "because Alameda Street would be reconstructed generally in its existing configuration, it would not attract additional traffic from other major north/south roadways in the region" (p. 4-54, *FEIR*), fails to address the role that Alameda Street plays in the *Congestion Management Program for Los Angeles County* and ignores issues associated with existing level-of-service (LOS) deficiencies, projected ambient growth within the region and added truck-haul traffic associated with port expansion. Decreased traffic flow and LOS conditions will produce corresponding effects upon other topical issues which are not adequately addressed in the *DEIS* (e.g., air quality; noise; energy consumption; individual mobility; socioeconomic factors). As a result, over reliance upon the environmental analysis presented in the *FEIR* both misrepresents and under-estimates the potential effects associated with the NEPA preferred project. 5

By describing the NEPA preferred project as merely "a modification of Alternative 2.1A" (p. S-11, *DEIS*), the federal lead agencies both misrepresent the substantive differences between these projects and seek to circumvent reasonable technical analysis. In the opinion of the City, Alternative 2.1B constitutes a distinctly different project alternative and should, therefore, be analyzed to the same level of detail as would be required for a new project option.

- Since federal "agencies shall not commit resources prejudicing selection of alternatives before making a final decision" (Section 1502.2(f), *CEQ Regulations*) and since "final design activities, property acquisition, purchase of construction materials or rolling stock, or project construction shall not proceed until the following have been completed...a EIS has been approved and available for the prescribed period of time and a record of decision has been signed" (Section 771.113(a), *FHWA NEPA Guidelines*), the City requests that the federal lead agencies disclose any potential actions that may have been undertaken by those agencies which may be contrary to the provisions of those regulations (e.g., Section 1506.1, *CEQ Regulations*). Since "a goal has been established to begin construction by 1995" (p. S-26), the attainment of this goals would necessitate that numerous pre-construction and permitting actions are being undertaken concurrent with the preparation and processing of this EIS. The *DEIS* should further identify the source of all discretionary federal and State funds and should clarify how "approximately 27 percent of the required funds have been committed" 6

(p. S-26) to the project in the absence of final NEPA compliance.

- As required under 40 CFR 1501.7, the federal lead agency is required to "indicate the relationship between the timing of the preparation of environmental analysis and the agency's tentative planning and decision-making schedule." Based upon this obligation, the *DEIS* should be augmented to include a detailed outline illustrating the relationship between the NEPA process and the decision-making process. (6)

- In recognition of the limited range of alternatives analyzed (i.e., proposed project, no build alternative), the level of resulting analysis appears to more closely represent an assessment of project feasibility rather that a true choice among different development options. Citing Section 1502.5 of the *CEQ Regulations,* "for projects directly undertaken by federal agencies, the environmental impact statement shall be prepared at the feasibility analysis (go-no go) stage and may be supplemented at a later stage as necessary." Is it presently the lead agencies' intent to utilize the subject EIS as a project-specific analysis (authorizing commencement of construction activities) or does this environmental document present only a program level assessment, requiring the preparation of a subsequent tiered EIS which will be subject to further environmental review at a later stage in the planning process? (7)

- As required under Sections 1502.10(a) and 1502.11 of the *CEQ Regulations,* a "cover sheet" shall be submitted as a requisite component of the EIS. Information which is required thereupon includes, but is not limited to: (1) a list of responsible agencies, including the lead agency and any cooperating federal agencies; (2) a listing of cooperating agency actions; (3) the lead agencies' designated contact person; (4) an abstract of the proposed project; and (5) Standard Form 424. Neither the "cover sheet" nor any of the above information was included in the material provided in a format similar to that described in the above citation. (8)

- Throughout the *DEIS* conclusions are presented which are purportedly based upon acceptable technical analyses and scientific protocols; however, the supporting documentation which would allow a reviewer to independently validate the report's conclusions are neither referenced nor included as an appendices in the *DEIS.* This failure to present the supportive rationale for the conclusions presented therein raise legitimate questions concerning both the appropriateness of those findings and the *DEIS*'s conformity with Section 1502.18(c) of the *CEQ Regulations*, which indicate that an appendix should contain the information which would "normally be analytic and relevant to the decision being made." (9)

- The need to present (for independent review) the methodologies utilized in the derivation of conclusions is further reinforced by the requirements of Section 1502.24 of the *CEQ Regulations*. As indicated therein, "agencies shall insure the professional integrity, including scientific integrity, of the discussions and analysis in environmental impact statements. They *shall* identify any methodologies used and shall *make explicit* reference by footnote to the

scientific and other sources relied upon for conclusions in the statement. An agency may place discussion of methodology in an appendix" (emphasis added). These materials are not now contained in the *DEIS*.

- Under NEPA (and as required under Section 1502.22(b) of the *CEQ Regulations)*, agencies have an obligation to base the findings presented in the EIS upon factual and supportable scientific analysis. Should that information not be known or should incomplete information presently exist, federal lead agencies have an obligation to generate the supporting material; however, if the means of data generation are not known or the cost of development is "exorbitant," the agency is required to include: (1) a statement that such information is incomplete and unavailable; (2) a statement of the relevance of the incomplete or unavailable information to evaluating reasonably foreseeable significant adverse impacts on the human environment; (3) a summary of existing credible scientific evidence which is relevant to evaluating the reasonably foreseeable significant adverse impact; and (4) the agency's evaluation of such impacts based upon theoretical approaches or research methods generally accepted in the scientific community. The *DEIS* fails to both undertake appropriate analysis to bridge existing informational gaps and, based upon the presence of incomplete or unavailable information, fails to comply with this requirements. (9)

- Although Section 1502.23 of the *CEQ Regulations* do not specifically mandate the preparation of a cost-benefit analysis relevant to the choice among "environmentally different alternatives," the federal lead agencies should disclose its reasons for not undertaking that analyses and "at least indicate those considerations, including factors not related to environmental quality, which are likely to be relevant and important to the decision." (10)

- Section 1502.25(b) of the *CEQ Regulations* indicate that the *DEIS* "shall list all federal permits, licences, and other entitlements which must be obtained in implementing the proposal. If it is uncertain whether a federal permit, license, or other entitlement is necessary, the draft environmental impact statement shall so indicate." No such listing is presently provided in the draft document. (11)

6.0 FEDERAL HIGHWAY ADMINISTRATION NEPA GUIDELINES

- Pursuant to Section 771.109(a)(1) of the *FHWA NEPA Guidelines*, these regulations, in combination with the *CEQ Regulations*, apply to actions where the FHWA "exercises sufficient control to condition the permit or project approval." As further indicated in Section 771.109(a), environmental documents prepared by the FHWA shall be developed in accordance therewith. Based upon this public declaration, the *DEIS* is required to fully conform to the technical and procedural requirements delineated in those regulations.

- As indicated in the *Notice of Intent*, published in the Federal Register (December 16, 1993), the proposed project was identified as a "highway improvement and railroad consolidation project" (58 FR 65756). Is the proposed project a component of a "federal-aid highway program" within the meaning of Section 771.111(h) of the *FHWA NEPA Guidelines*? If so designated, has transcripts of all public hearings been prepared in accordance with Section 771.111(h)(vi) therein? If public transcripts exist as part of the project's environmental review record, the City requests receipt of a certified copy of those transcripts and further requests that said transcripts be formally identified and included in the *DEIS*. All oral public and agency comments concerning the environmental and socioeconomic effects of the project (upon the human environment) should be accurately described and addressed as part of the federal lead agencies' responses thereto. (1)

- As indicated in Section 771.125(a)(2) of the *FHWA NEPA Guidelines*, the FHWA states the following public policy, "*every reasonable effort* shall be made to resolve interagency disagreements on actions before processing the final EIS" (emphasis added). As indicated in the City's earlier comments, a formal request has been made to incorporate the analysis of a number of additional project alternatives (e.g., variations of a depressed trainway and truckway). Those alternatives have, however, been rejected and insufficient supportive rationale provided in defense of that action. Based upon the above excerpt, the City again requests that the federal lead agencies conduct a detailed comparative evaluation of the alternatives identified by the City. (2)

- Sections 771.125(c)(1) and (2) of the *FHWA NEPA Guidelines* directs the "Headquarter office" of the FHWA to conduct a review of the EIS when: "(i) additional coordination with other federal, state or local governmental agencies is needed; (ii) the social, economic, or environmental impacts of the action may need to be more fully explored; (iii) the impacts of the proposed action are unusually great; (iv) major issues remain unresolved; or (v) the action involves national policy issues." With the exception of the latter condition, each of the above referenced criteria have been met by the project; therefore, prior to the adoption of the final EIS, a detailed review of the technical and procedural adequacy of the *DEIS* should be undertaken by the FHWA's "Headquarter office." (3)

7.0 FEDERAL RAILROAD ADMINISTRATION NEPA GUIDELINES

- Pursuant to the *FRA NEPA Guidelines*, the proposed project may be deemed to constitute a "programmatic action" (i.e., a group of FRA actions composed of decisions which are themselves FRA actions but where no single action would be taken except in conjunction with other related actions) and, therefore, classified as "a major FRA action for purposes of this order." As further stated therein, "decisions on related rail facilities, e.g., connecting lines of a railroad or consolidations, should normally be considered a programmatic action." Although the *DEIS* identified both "Port Infrastructure Plans" and the "Port Access (1)

Demonstration Project" (pp. S-26 and 2-44) as related projects, the document fails to identify, describe and evaluate the environmental effects associated with other programmatic components which are later in time and/or further removed from the improvements described therein.

- Since the project is purportedly proposed in response to the projected growth of cargo demands in the San Pedro Bay Ports (e.g., 99 million metric tons in 1991 to 210 million metric tons in the year 2020), it is reasonable to assume that other programmatic actions can be envisioned. The physical linkages between this project and other components of the national rail system are graphically represented in Figure S-1 (National Context of the Alameda Corridor) in the *DEIS*; however, the analytical component of that document is limited to "a 32-kilometer (20-mile) corridor" (p. S-1). The *DEIS*, however, fails to acknowledge its disclosure obligations associated with those related programmatic actions.

- As required under Section 6(g)(2) of the *FRA NEPA Guidelines*, "a programmatic environmental document should identify *program level alternatives* and assess the programwide environmental impacts. To the extent information is available, it should also identify the alternatives to and impacts of component FRA actions within the program, and the *implications on alternative transportation systems*" (emphasis added). Presently, the *DEIS* only addresses project-level alternatives (i.e., different configurations of the same system) and does not examine other program-level options which represent broad-based public policy alternatives. (1)

  Although "through trains account for the vast majority of movements affecting ports-related trackage" (p. 2-18), no discussion is presented concerning other program-level alternatives (e.g., should the San Pedro Bay Ports constitute the west coast point of debarkation for regional cargo demands?). Other in-State ports (e.g., San Diego, San Francisco, Oakland), out-of-State ports (e.g., Tacoma, Washington) or international ports (e.g., Ensenada, Mexico) may, in fact, be competing for the same market share that is the basis for the proposed project. Should those other competing facilities prove more effective (or more competitive), the anticipated demand may not materialize or may materialize to a lesser degree. As a result, the *DEIS* should be augmented to discuss both other programmatic alternatives which, if implemented, may affect the nature of the proposed improvements and other identified assumption which, should they materialize, affect those growth projections which predicate the need for the proposed project.

- Section 14(r) of the *FRA NEPA Guidelines* require that *DEIS* to contain "a compilation of all applicable federal, state and local permits, licenses, and approvals which are required before the proposed action may commence." Although the FRA is identified as a "joint federal lead agency" (p. S-1), the full extent of that agency's involvement (e.g., permitting, funding, Section 4(f) determination) is never disclosed in the *DEIS*. Rather, in describing (2)

the totality of federal actions, the document indicates that the "actions which must be taken by FHWA/FRA in the course of completing this environmental process (conformity determination, issuance of a *Record of Decision*)" (p. S-28) neither involve the commitment of public funds or the issuance of any entitlements. This failure to adequately and fully describe all requisite federal, State and local actions constitutes a major short-coming with the document. As with the above discussion of programmatic alternatives, the decision to allocate finite federal funding to one activity forecloses the ability to allocate those same finite federal funds to other alternative projects. (2)

Should FRA financial assistance be anticipated (e.g., Sections 505 and 511 of the Railroad Revitalization and Regulatory Reform Act of 1976, as amended), the source, statutory authority and applicable regulatory requirements associated therewith should be identified.

- The *DEIS* does not formally identify "the extent to which other federal, State, or local agencies are funding or otherwise participating in or regulating the alternatives," as required under Section 14(k) of the *FRA NEPA Guidelines*.

- The FRA "is responsible for substantive and procedural compliance with environmental laws, orders, and regulations, and cannot delegate this responsible to applicants" (Sections 7(f) and 8(c), *FRA NEPA Guidelines*). In accordance with this requirement, the FRA has a obligation to ensure that the environmental review record fully satisfies the intend of NEPA, its implementing regulations and all related laws and authorities associated therewith. The myriad of "substantive and procedural compliance" issues identified herein suggests that the FRA has failed to fulfill its obligations thereunder. (3)

- Although the *DEIS* fails to clearly describe project-related impacts upon areawide floodplains, that document indicates the United States Army Corps of Engineers (USACOE) "has identified inadequacies in the existing flood control system" (p. 3-32), that "the area south of Rosecrans Avenue lies within a 100-year flood zone" (p. 3-32), "in the event of a storm during construction within the flood control channel(s), workers within the channel(s) would be at risk" (p. 4-25) and the project "would result in floodplain encroachment in several locations" (p. 4-26). As required under Section 9(b)(4) of the *FRA NEPA Guidelines*, "if one or more alternatives include significant encroachment on a floodplain, this notice [of *DEIS* availability] shall make reference to that fact." Did all requisite notice include this disclosure? (4)

- As required under Section 10(b) of the *FRA NEPA Guidelines*, "the relevant environmental impacts of all alternatives should be identified and discussed, including both beneficial and adverse impacts; impacts which are direct, indirect, and cumulative; and impacts of both long and short-term duration; and mitigation measures that would be included for each alternative..." As presently structured, the *DEIS* is not formatted in a manner which allows (5)

an independent evaluation of distinct project alternatives, clearly and fully identifying and evaluating all potential environmental impacts associated with each development option and segregating (by alternative) those mitigation measures which should be implemented in the event that an alternative implementation strategy is selected by the federal lead agencies. By failing to provide a reasonably equivalent analysis of all identified alternatives, the *DEIS* neither satisfies the intent of the *FRA NEPA Guidelines* nor fulfills its obligations under NEPA. 5

- Section 10(b) of the *FRA NEPA Guidelines* indicates that "the following aspects of potential environmental impact should be considered...solid waste disposal...impacts on wetland areas...coastal zone management...use of energy resources...use of other natural resources, such as water, minerals or timber...impacts on transportation; of both passengers and freight; by all modes, including bicycle and pedestrian modes; in local, regional, national, and international perspectives...possible barriers to the elderly and handicapped...public health...recreational opportunities..." Each of these obligations are briefly discussed below:

  - Pursuant to Section 14(n)(4) of the *FRA NEPA Guidelines*, the *DEIS*'s evaluation of "alternatives should be assessed with respect to applicable state and local standards for sanitary landfill and solid waste disposal." Although a significant amount of construction material (e.g., excavated soils) and operational wastes (e.g., greenwastes) will be disposal, no analysis of this topical issue is presented in either the *FEIR* or *DEIS*.

  - Since a portion of the project area is subject to the California Coastal Act and applicable Local Coastal Plans (pursuant to the federal Coastal Zone Management Act), the *DEIS* is obligated "to discuss to what extent the alternatives are consistent with approved coastal zone management programs" (Section 14(n)(9), *FRA NEPA Guidelines*) and discuss potential conflicts with the objectives of other regional, State and local plans, policies and controls (Sections 1502.16(c) and 1506.2(d), *CEQ Regulations*). Should such conflicts be identified (and disclosed), the federal lead agencies should describe the process and criteria through which the project's decision-makers will weight the significance of those conflicts against other environmental and non-environmental factors in reaching a rationale and balanced decision. 6

  - As required under Section 14(n)(10) of the *FRA NEPA Guidelines* (and Section 1502.16(e) of the *CEQ Regulations*), "the EIS shall assess in detail any irreversible or irretrievable commitments of energy resources likely to be involved in each alternative and any potential energy conservation." In addition, the *DEIS* is further required to identify any irreversible or irretrievable commitments of natural resources (e.g., water, minerals, timber) likely to be involved in each alternative (Section

14(n)(11), *FRA NEPA Guidelines* and Section 1502.16(f) of the *CEQ Regulations*). These analytical obligations are not now addressed in the *DEIS*.

- In its analysis of impacts upon the elderly and the handicapped, the *DEIS* "shall assess impacts of the alternatives on the transportation and general mobility" (Section 14(n)(14), *FRA NEPA Guidelines*). No discussion of elderly or handicapped mobility or transportation needs are presented in the *DEIS*.

- Although specifically required under Section 14(n)(19) of the *FRA NEPA Guidelines*, the document does not presently address the impacts of each project alternative on sites devoted to recreational activities, upon hiking and bicycling activities and upon other non-activity specific sites designed as or utilized for open space.

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Despite these disclosure requirements, no discussion of any of the above reference topical issues is, however, presented in the *DEIS* and no agency rationale is presented indicating the agencies' reasons for deleting this analysis herein.

- As indicated in Section 12.4(f)(b)(6) of the *FRA NEPA Guidelines*, "the Office of Chief Counsel shall review every [Section] 4(f) [of the Department of Transportation Act] determination and shall advise the program office in writing as to the legal sufficiency of the 4(f) determination." Since the *DEIS* identified that the *Redondo Junction Watchman's Tower* will be impacted (p. 4-24) and concludes that "such work will not adversely affect the historic qualities of the facility" (*Ibid*), the written comments of the Office of Chief Counsel should be provided to support that determination, particularly since the State Historic Preservation Officer (SHPO) and the Advisory Council on Historic Preservation (ACHP) has yet to provide independent rulings.

- The *DEIS* does not formally identify that this federal environmental disclosure document contains "a 4(f) determination made pursuant to Section 4(f) of the Department of Transportation Act, 16 USC 1653(f)" as required under Section 14(a) of the *FRA NEPA Guidelines*.

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- Section 12.4(f)(d) of the *FRA NEPA Guidelines* requires that "the information required by Section 4(f) should normally be incorporated as an integral part of the environmental document rather than as a separate section." Although the content of that determination is specifically delineated in Section 12.4(f)(d) of the *FRA NEPA Guidelines*, the *DEIS* fails to both incorporate that information or explain the agency's rationale for not including that requisite information. Required information includes, but is not limited to, "evidence of concurrence or of efforts to obtain concurrence of the public official or officials having jurisdiction over the 4(f) protected properties regarding the proposed action and the planning to minimize harm" (Section 12.4(f)(d)(11)).

- Has the *DEIS* been "signed by the head of the program office" and copies transmitted in accordance to the requirements of the *FRA NEPA Guidelines* (Section 13(c)(3), *FRA NEPA Guidelines*)? Has the Office of Policy and Program Development been formally requested and subsequently submitted comments "in writing as to the consistency of the draft EIS with FRA policies and programs" (Section 13(c)(4), *FRA NEPA Guidelines*)? Has the document been transmitted to "the Administrator concurrently with the advise obtained from the Office of Policy and Program Development, when applicable, and from the Office of Chief Council" (Section 13(c)(6), *FRA NEPA Guidelines*) and to all other federal agencies as specified under Sections 13(c)(7) and (8) of the *FRA NEPA Guidelines*)? Have all written comments been received and have responses thereto been included in either the *DEIS* or the project's environmental review record? (8)

- As authorized under Section 13(f) of the *FRA NEPA Guidelines*, the City (as a commenting agency) requests that the local program office keep the City abreast of the agency's "progress in carrying out mitigation measures they proposed and which were adopted by FRA" and make available to the public the results of all relevant monitoring conducted both by that agency and other governmental agencies participating in the mitigation monitoring program. (9)

- The *DEIS* fails to formally identify the program office which prepared the document and the name and address of the person in the FRA to whom comments on the document should be addressed, as required under Sections 14(d) and (f) of the *FRA NEPA Guidelines*.

- An EIS is obligated to include not only the actions which are being taken, but also the actions which are not taken. As indicated in Section 14(l) of the *FRA NEPA Guidelines*, the *DEIS* shall disclose those "feasible mitigation measures which have not been incorporated into the proposed action." (10)

- The form and format of the *DEIS* shall be established for the sole purpose of clearly conveying factual information concerning the project's effects (e.g., Sections 1502.8 and 1502.10, *CEQ Regulations*), demonstrating compliance with applicable disclosure obligations (e.g., Section 5-5(c), *EO 12898*), facilitating both selection between a range of reasonable alternatives and independent public and agency analysis of the information presented therein. As presently structured, the document fails to fulfill either objective. For example, Section 14(o) of the *FRA NEPA Guidelines* indicates that the EIS shall contain "a summary of unavoidable adverse impacts of the alternatives and a description of mitigation measures planned to minimize each adverse impact. Impacts and mitigation measures should be identified *in this table* as either long-term, short-term, or construction period" (emphasis added). The summary table presented in the *DEIS* does not contain this required information. (11)

- Although Appendix D of the *DEIS* identifies those "parties receiving copies of the EIS," the (12)

*DEIS*does not document compliance with the federal lead agencies' compliance with Section 1506.6(b) of the *CEQ Regulations*. In order to demonstrate full compliance therewith, the *DEIS* should be augmented to include a complete listing of all parties which formally received notice of NEPA-related hearings, public meetings and the availability of environmental documents, including: (1) a listing of individuals who have formally requested notice; (2) notification of Statewide (e.g., Office of Planning and Research) and areawide clearinghouses; (3) community organizations and small-business associations; (4) owners and occupants of adjoining and affected properties; and (5) locations where notices have been posted. (12)

8.0 CALIFORNIA DEPARTMENT OF TRANSPORTATION GUIDELINES

- Although not identified as a federal lead agency in the *DEIS* (p. S-26), the document acknowledges that "Caltrans will be responsible for the coordination and oversight of appropriate environmental studies and necessary technical analysis, and for coordinating preparation of environmental documents, including, but not limited to, agency and public involvement, notifications, and coordination with affected agencies and the public" (*Memorandum of Understanding*, included in Appendix F of the *DEIS*). Based upon this declaration, the environmental policies of that agency must be considered and, as appropriate, incorporated into this EIS. The active participation of this State agency is critical since many of the subsequent discretionary actions may involve this transportation agency.

- As indicated in the publication entitled *Conducting Socioeconomic Analysis - Guidance for Consultants* (Caltrans, May 1988), Caltrans' acknowledges that "regardless of the specific language of the law and regulations, in practice, interest groups have proven to be effective in requiring Caltrans to analyze **any** socioeconomic effect that they consider significant" (emphasis included in citation). Citing a 1987 Caltrans' *Policy Direction Statement*, the report notes that "in the development of the State's transportation programs and projects, all environmental, social, and economic effects will be considered along with the technical issues and final transportation decisions will be made in the best overall public interest" (p. 2). Notwithstanding the identification of socioeconomic concerns during the EIS scoping process and Caltrans' own declaration of its commitment to the identification and analysis of all economic issues as part of the environmental review and decision-making process, the *DEIS* fails to fully consider all potential relevant impacts upon affected businesses and populations. The *DEIS* should, therefore, be augmented to incorporate a reasonable socioeconomic analysis and/or Caltrans should provide the supporting rationale why a separate set of analytical standards apply to public and privately-sponsored projects. (1)

- In *Conducting Socioeconomic Analysis - Guidance for Consultants* (*Socioeconomic Guidelines*), Caltrans cites the FHWA's *Technical Advisory T 6640.8A* (October 30, 1987) (2)

reference that "data analysis should be commensurate with the importance of the impact" (p. 4). This language parallels Section 1502.15 of the *CEQ Regulations* which states that "data and analysis in a statement shall be commensurate with the importance of the impact."

In recognition of the policy directive of *EO 12898* and the *DEIS*'s own declaration that "construction activities along the Alameda Corridor may produce a substantial adverse effect upon business located along the corridor...For some businesses, especially small retail operations, prolonged construction could substantially affect their operation and viability" (p. 4-62, *Socioeconomic Guidelines*), the *DEIS* has an obligation to acknowledge and fully evaluate the significance of this important topical issue, including the ramifications of its own findings and the lead agencies' concomitant responsibilities for a thorough assessment of this topical issue.

- In addressing socioeconomic impacts, Caltrans states that "study area boundaries may be drawn differently for several types of impacts: socioeconomic, cultural, noise, etc. Consideration also should be given to indirect project effects, such as impacts on nearly commercial areas whose trade area suffers population losses from the project, but does not directly impact the commercial properties." (p. 4-5, *Socioeconomic Guidelines*). Although the earlier EIR addressed direct economic effects, no further attempt has been made in the *DEIS* to accurately and fully define the entire geographic area (e.g., communities, neighborhoods, business centers) which may be indirectly and/or cumulatively affected by construction-term and long-term project impacts. For example, the *DEIS* concludes that "individual properties at a distance of 5,000 feet from the project site would not be subject to potential impacts" (p. E-6, *DEIS*). Although the majority of direct effects attributable to the project may not affect most properties located a considerable distance from the actual roadway, there exists indirect environmental consequences which extend even further that the distance stated. As a result, the socioeconomic analysis fails to satisfy Caltrans' own guidelines and should, therefore, be augmented to identify and evaluate the secondary socioeconomic consequences attributable to the project. (2)

- As indicated in the Caltrans' *Environmental Handbook: Manual of Instructions, Volume I (Caltrans Environmental Guidelines)*, it is that agency's environmental policy to both "consider alternative solutions to any particular transportation problem with an eye toward reducing environmental impacts of alternatives [and] select, within these constraints and other factors which also must be considered, that alternative which causes the least environmental damage and yet serves the essential transportation need" (p. 1-2). This declared policy requires Caltrans to identify alternatives which have the potential to reduce or avoid identified environmental effects. Based upon this policy, the *DEIS* should describe how the limited choice between the proposed project and the "no build" alternative conforms to this established State policy. (3)

- In accordance with the *Caltrans Environmental Guidelines*, the *DEIS* shall include a "cover sheet" which includes both the State Clearinghouse number, the report number (as assigned by the FHWA Division Officer), a list of cooperating federal agencies and an abstract describing the project, alternatives, significant effects and major mitigation measures (p. 3-4.1). No "cover sheet" has been included with the *DEIS*; therefore, none of these items are presented in the format established under the *Caltrans Environmental Guidelines*. (4)

- The *Caltrans Environmental Guidelines* further states that a "summary" shall be presented which includes "federal actions required because of this project, such as permit approvals [and] describe any significant actions proposed by other governmental agencies in the same geographic area as the proposed project" (p. 3-4.1). The *DEIS* fails to comply with this informational obligation. (5)

- In describing the range of alternatives to be addressed in EISs, the *Caltrans Environmental Guidelines* indicates that those alternatives shall "include reasonable alternatives not within Caltrans' jurisdiction" (p. 3-4.1). The *DEIS* shall describe how the selection between the preferred project and the "no build" alternative fulfills this requirement. (6)

9.0 EXECUTIVE ORDER 12898: ENVIRONMENTAL JUSTICE

- As required under *EO 12898* (*Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Areas*), dated February 11, 1994, "each federal agency shall make achieving environmental justice part of its mission by identifying and addressing, as appropriate, disproportionately high and adverse human health or environmental effects of its programs, policies, and activities on minority populations and low-income populations..."

  As indicated in the *FEIR*, "in general, the population near the Alameda Corridor is predominately minority (Hispanic and black) and had lower median family incomes and higher percentages of families living below poverty level in 1980 than the County of Los Angeles overall" (p. 5-61, *FEIR*). The *FEIR* further states that "over 70 percent of the population was non-white; 68 percent Hispanic and 23 percent black...the percentage of families living below poverty level in the corridor was 28 percent in 1980 while the county figure was 13 percent" (pp. 5-61 and 5-66, *FEIR*). Based upon these statistical abstracts, the corridor area clearly comprises a geographic subarea possessing "minority populations and low-income populations." Based upon both the area's demographics and the project's potential adverse environmental effects, the policies and purpose of the above referenced executive order directly apply to the Alameda Corridor project.

- As indicated in Section 1-103(a) of *EO 12898*, one of the tenets of an agency's environmental justice strategy deals with ensuring "greater public participation" in formulating and implementing federal plans and policies. This obligation parallels the (1)

requirement of Sections 1503.1(a)(4) and 1506.6(a) of the *CEQ Regulations* and Section 771.105(f) of the *FHWA NEPA Guidelines*, which mandate that federal lead agencies avoid discriminatory actions and affirmatively solicit comments from those persons or organizations who may be interested of affected by federal activities. In recognition of these complementary passages, the *DEIS* should disclose how the federal lead agencies' outreach endeavors have fully complied with these provisions. (1)

- As required thereunder, "within 12 months of the date of this order, each federal agency shall finalize its environmental justice strategy and provide a copy and written description of its strategy to the Working Group" (Section 1-103(e), *EO 12898*). Has FHWA submitted to the Working Group a finalized copy of its environmental justice strategy? Has FRA submitted to the Working Group a finalized copy of its environmental justice strategy? If so submitted, the City requests that FHWA and FRA both provide (to the City) a copy of those strategies include that information in the project's environmental review record?

- Section 1-103(e) of *EO 12898* further requires that "during the 12 month period from the date of this order [February 11, 1994], each federal agency, as part of its environmental justice strategy, shall identify several specific projects that can be promptly undertaken to address particular concerns identified during the development of the proposed environmental justice strategy, and a schedule for implementing those projects." What projects have the FHWA and FRA identified as demonstration projects? Has or can the proposed Alameda Corridor project be included in the list? If so included, pursuant to the agencies' current environmental justice strategies, what procedural, organizational and/or analytical changes would be required in the project's design, development or outreach efforts in accordance therewith? (2)

- The City requests from FHWA and FRA provide (to the City) copies of the final environmental justice strategies which are to be submitted to the President, through the Office of the Deputy Assistant to the President for Environmental Policy and the Office of the Assistant to the President for Domestic Policy, "within 14 months [April 11, 1995] of the date of this [Executive] Order" (Section 1-104). Additionally, should that action occur on or before the date that the federal lead agencies complete all written responses to public and agency comments submitted upon the *DEIS*, a copy of that final environmental justice strategy and a declaration of the federal lead agencies' compliance therewith should be included as part of the project's environmental review record.

10.0 INTERMODAL SURFACE TRANSPORTATION EFFICIENCY ACT

- As indicated in Section 2 of the *Intermodal Surface Transportation Efficiency Act of 1991* (Public Law 102-240, December 18, 1991) (ISTEA), "it is the policy of the United States to develop a National Intermodal Transportation System...[which] shall provide improved (1)

access to ports and airports, the Nation's link to world commerce." Based upon the intent and purpose of the Alameda Corridor project and the federal declaration delineating the components of that National Highway System, as identified in Section 1006(a) of ISTEA (amending 23 USC 103), the proposed project is clearly intended to serve as a component of the National Intermodal Transportation System and is, therefore, subject to the provisions of ISTEA.

As further indicated therein, "the National Intermodal Transportation System shall include sufficient improvements in public transportation necessary to achieve national goals for improving air quality, energy conservation, international competitiveness, and *mobility for elderly persons, persons with disabilities*, and *economically disadvantaged persons* in urban and rural areas of the country" (emphasis added). Based upon these policy declarations, the *DEIS* should describe how the proposed project directly fulfills each of the environmental goals delineated in the above citation. (1)

- As indicated in 23 USC 134(f) and 23 CFR 450.316, fifteen (15) factors must be considered as part of the planning process for all metropolitan areas. The *DEIS* should list those factors and address the project's consistency therewith.

- As indicated in ISTEA, "each metropolitan planning organization" shall prepare a long-range plan which both identifies "transportation facilities that should function as an integrated metropolitan transportation system" and include "a financial plan that demonstrates how the long-range plan can be implemented" (23 USC 134(g)). Is the proposed project consistent (40 CFR 1502.16(c)) with any and all "long-range plans" developed in response thereto, inclusive of any Statewide or metropolitan transportation plans developed under either 23 USC 135, 23 CFR 450.214 and 450.322 and/or Section 8 of the *Federal Transit Act Amendments of 1991*?

- As further required under ISTEA, "each metropolitan planning organization" shall develop a "transportation improvement program for the area for which such organization is designated" (23 USC 134(h); 23 CFR 450.216 and 450.324). As indicated in 23 CFR 450.222(a), "only projects included in federally approved STIP [Statewide transportation improvement programs] shall be eligible for funds administered by the FHWA or the FTA." Is the proposed project consistent (40 CFR 1502.16(c)) with any and all "transportation improvement programs" developed in response to the above cited federal actions? Has the FHWA made appropriate findings pursuant to 23 CFR 450.330? Has the State and the applicable metropolitan planning organization made annual certifications in accordance with 23 CFR 450.334? (2)

- In accordance with 23 USC 134(I), "within a transportation management area, transportation plans and programs shall be based on a continuing and comprehensive transportation (3)

planning process...[which] shall include a congestion management system that provides for effective management of new and existing transportation facilities eligible for funding under this title..." Is the proposed project consistent with any and all "congestion management" plans or programs developed by applicable metropolitan planning organizations? Has any priority ranking been provided to this project? (3)

- As indicated in 23 CFR 450.200, "the purpose of this subpart is to implement 23 USC 135, which requires each State to carry out a continuing comprehensive, and intermodal statewide transportation planning process, including the development of a statewide transportation plan and transportation improvement program, that facilitates the efficient, economic movement of *people and goods* in all areas of the state, including those areas subject to the requirements of 23 USC 134" (emphasis added). As further indicated in 23 USC 135, the State is obligated to develop "transportation plans and programs...[which] shall provide for development of transportation facilities which will function as an *intermodal state transportation system*"(emphasis added).

  Pursuant to 23 CFR 450.206(a)(4), the Statewide transportation planning process shall include the "development of a statewide transportation plan that considers a range of transportation options designed to meet the transportation needs (*both passenger and freight*) of the state including all modes and their connections" (emphasis added).

  As part of each "planning process product" (which should be construed to include the planning and environmental review of the Alameda Corridor project), the State is required to "consider, analyze as appropriate and reflect" upon such factors as: (1) strategies for incorporating bicycle transportation facilities and pedestrian walkways in appropriate projects; (2) access to ports, airports, intermodal transportation facilities, major freight distribution routes, recreational and scenic areas; (3) recreational travel and tourism; (4) transportation system management and investment strategies designed to make the most efficient use of existing transportation facilities (*including consideration of all transportation modes*); (5) methods to expand and enhance appropriate transit services to increase the use of such services (including commuter rail); and (6) the effects of transportation decisions on land use. These factors have, however, neither been addressed in the *DEIS* nor in the development of those project alternatives presented therein. Based upon the above referenced public policy declaration, the *DEIS* should be expanded to include the identification and subsequent analysis of one or more additional project alternatives which incorporate the expanded use of the Alameda Corridor and the improvements proposed thereupon for the transport of people as well as goods. (4)

- As indicated in 23 CFR 450.300, "the purpose of this subpart is to implement 23 USC 134 and Section 8 of the Federal Transit Act, as amended, which requires that a Metropolitan Planning Organization (MPO) be designated for each urban area and that the metropolitan

area has a continuing, cooperative, and comprehensive transportation planning process that results in plans and programs that *consider all transportation modes* and supports metropolitan community development and social goals. These plans and programs shall lead to the development and operation of an *integrated, intermodal transportation system* that facilities the efficient, economic movement of people and goods" (emphasis added). Section 450.302 therein further states that "the provisions of this subpart are applicable to agencies involved in the transportation planning, program development, and project selection processes in metropolitan areas." Notwithstanding this requirement, an integrated, intermodal approach to the proposed project has neither been developed nor represented in the *DEIS*. (4)

- There exists insufficient rationale presented in the *DEIS* to defend the federal lead agencies' interpretation that Section 450.318 of the Statewide and metropolitan planning regulations (effective November 29, 1993) under ISTEA are not relevant to the proposed project.

  As stated in the *FEIR*, "a regional consensus has emerged that the Alameda Corridor should be developed into a *high capacity truck/train corridor* to serve the long-term, port access needs of the Los Angeles and Long Beach Harbors. As officially adopted by the ACTA governing board, the purpose of the project is: To facilitate access to the ports through the year 2020 while mitigating potentially adverse impacts of the ports' growth, including *highway traffic congestion*, air pollution, vehicle *delays at grade crossings*, and noise in residential areas"(emphasis added) (p. 1-1, *FEIR*).

  With an estimated construction "cost of $1.8 billion" (p. S-26, *DEIS*), the project is clearly a major highway improvement project within the meaning of those regulations. Since those potential project alternatives consisting of "four traffic lanes were eliminated because the traffic analysis showed that these options would carry less traffic" (p. S-8), roadway capacity considerations are clearly a primary objective of the agencies' planning process. Similarly, since one of the identified benefits of the project involves the elimination of "conflicts between trains and between trains and motor vehicles" (p. 1-1) and "unless the corridor can be implemented...traffic delays will be spread throughout the region...as an indirect result of traffic delays at grade crossings" (p. 1-6), those actions, if realized, will improve roadway capacities by diminishing delays at existing at-grade crossings. It should be further noted that the *DEIS* acknowledges that the federal lead agencies: (1) eliminated from further consideration both the UPRR and Los Angeles River route alternatives since they "would provide essentially only a rail facility, and accommodation of vehicular traffic would not be addressed unless a separate project were also to be considered" (p. 2-8); and (2) considered "grade separation" as a means to "improve traffic flow" (p. 2-10). (5)

  The *DEIS* appears contradictory when first it states that alternatives were eliminated because they do not add to capacity and then subsequently state that the project would not

"substantially affect capacity" (p. S-29). In summarizing project-related impacts, the *DEIS* concludes that the "overall traffic handling capacity" of the roadway network would be "beneficial" (p. S-38).

Based upon those declarations of the project's stated intent and purpose, the *DEIS* should re-examine its interpretation of and relevancy to the above cited regulations.

- Although the *DEIS* correctly cites 23 CFR 450.104, defining "major metropolitan transportation investment," that document's interpretation of that provision (and the federal lead agencies subsequent obligations thereunder) appears incorrect. Since a "major metropolitan transportation investment" is defined as "a high-type highway or transit improvement of substantial cost that is expected to have a *significant effect on capacity, traffic flow, level of service, or mode share at the transportation corridor* or subarea scale" (emphasis added), the findings of that disclosure document appear to support this definition more than they refute its possible applicable. Throughout the *DEIS*, the document indicates that the project's goals include: (1) efforts "to improve level-of-service at intersections" (p. 2-1) (i.e., level-of-service improvements); (2) "reduce vehicle delays at grade crossings" and " improve north/south travel speeds" (p. 2-1) (i.e., traffic flow improvements); and (3) "divert truck traffic to rail" (p. 2-1) (i.e., mode shift). In summarizing the identified benefits of the project, the *DEIS* concludes: (1) "traffic delays affecting cars and trucks at grade crossings can be reduced by 90 percent (15,000 vehicle hours per day)" and "delays in emergency vehicles can be substantially reduced" (p. S-5); (i.e., traffic flow improvements); and (2) "stoppages involving two trains can be reduced by 75 percent" and "conflicts between trains and motor vehicles can be virtually eliminated" (p. 1-1) (i.e., traffic flow). Based upon these goals, declared benefits and projected $1.8 billion cost, the proposed project is clearly a "major metropolitan transportation investment" within the meaning of 23 CFR 450.104.

Through its pre-circulation comments, incorporated herein by reference, the City has formally requested the consideration of an a number of additional project alternative, including: (1) a completely depressed and completely covered trainway and truckway from the north to the south City limits; (2) a depressed and covered trainway and truckway within the central portion of the City (from Greenleaf Boulevard on the south to Rosecrans Avenue on the north); and (3) a depressed trainway and truckway from the north to the south City limits. Despite that request, the *DEIS* states that "the truck expressway would not meet the goal of attracting trucks away from parallel freeways" (p. 5-2).

The above statement infers that the election not to consider this option was predicted upon a project objective (as established by the federal lead agencies) to maximize "traffic flow" and "level-of-service" both within and external to the Alameda Corridor. Those objectives are clearly identified in the *FEIR*'s delineation of "project goals and criteria" (pp. 2-1

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through 2-5). As indicated therein, traffic goals include a commitment to "improve level-of-service at intersections" (p. 2-2).

- In accordance with 23 CFR 450.318(a), "where the need for a major metropolitan transportation investment is identified, and federal funds are potentially involved, major investment (corridor or subarea) studies shall be undertaken to develop or refine the [metropolitan transportation] plan and lead to decisions by the MPO [Metropolitan Planning Organization], in cooperation with participating agencies, on the design concept and scope of investment." Since the project satisfies the criteria established for that major investment study (see above comments), that study should be undertaken and the findings of that analysis included as part of the project's environmental review record. Pursuant to Section 450.318(f)(1) and (2), "as a minimum the participating agencies will use the major investment study as input to an environmental impact statement or environmental assessment...the participating agencies may elect to develop a draft environmental impact statement or environmental assessment as part of the major investment study."

  As indicated in 23 CFR 450.318(c), the "major investment study" shall "evaluate the effectiveness and cost-effectiveness of alternative investments or strategies in attaining local, state and national goals and objectives. The analysis shall consider the direct and indirect costs of reasonable alternatives and such factors as mobility improvements; social, economic, and environmental effects; safety; operating efficiencies; land use and economic development; financing; and energy conservation." (6)

  Based upon the above citations, the lead federal agencies have a regulatory obligation to both undertake a "major investment study" prior to any formal action upon the proposed project and to include in that study each of the analytical issues identified in the above cited regulations.

- Preparation of a "major investment study" would constitute a reasonable "cost-benefit analysis" for the proposed undertaking. As indicated in 40 CFR 1502.23, "if a cost-benefit analysis relevant to the choice among alternatives is being considered for the proposed action, it shall be incorporated by reference or appended to the statement as an aid in evaluating the environmental consequences." The City requests that both a "major investment study" be undertaken and that the resulting study comply with the requirement of both 23 CFR 450.318(c) and Section 1502.23 of the *CEQ Regulations*.

11.0 LOS ANGELES COUNTY CONGESTION MANAGEMENT PROGRAM

- As indicated in the *Congestion Management Program for Los Angeles County* (Los Angeles County Metropolitan Transportation Authority, November 1993) (*County CMP*), Alameda Street (between the Ports of Los Angeles to Route 101) is identified as a "principal arterial" (1)

(p. 20, *County CMP*) and is, therefore, a component of the Los Angeles County (County) Congestion Management Program (CMP) Highway System. As defined therein, a "principal arterial" is a "route that completes gaps in the State highway system; routes providing connectivity with the CMP system in adjacent counties; or routes along major inter-jurisdictional travel corridors, providing primary, high volume or *multi-modal transportation*" (p. 18, *County CMP*) (emphasis added).

As further indicated therein, "Alameda Street will be replaced by a new alignment when the federal demonstration project is completed" (p. 21, *County CMP*). Based upon both the inclusion of Alameda Street in the *County CMP* and reference to "a new alignment," the *DEIS* should indicate whether the preferred project (Alternative 2.1B) alignment constitutes that project more thoroughly described therein. If this "new alignment" referenced under the *County CMP* differs from the plan presented in the *DEIS*, the *DEIS* should describe any differences between these plans (40 CFR 1502.16(c)) and should address the future CMP alignment as an additional project alternative and/or related project. (1)

- As indicated in the *County CMP*, "the level of service (LOS) standard in Los Angeles County is LOS E" (p. 22, *County CMP*). Since a number of project area intersections are projected to experience LOS F conditions in the year 2020 (p. 4-53, *DEIS*), the preferred project does not include a development strategy consistent with the goals of the *County CMP*. Notwithstanding this lack of conformity, the *DEIS* indicates that post-project traffic capacities at the project's study area intersections are either "not substantial" or "beneficial." Based upon this apparent inconsistent, the traffic analysis presented in the *DEIS* should be augmented to include an expanded discussion of the project's conformity with the *County CMP*. Should any potential inconsistencies be identified, including analytical differences in the methodologies outlined in the *DEIS* and *County CMP*, those differences should be clearly delineated (40 CFR 1502.16(c)) and the rationale for any potential inconsistency presented for public review and discussion. (2)

12.0 CALIFORNIA ENVIRONMENTAL QUALITY ACT

- Although both CEQA and NEPA contain many similarities, the distinct differences between the two statutes (and accompanying regulatory requirements) create inherent defects in the use of the *FEIR* as the basis for fulfilling NEPA disclosure obligations. Those differences, which are briefly addressed herein, include both the requisite level of analysis and the approach to alternatives analysis.

  Under NEPA, the EIS must integrate "related surveys and studies" (40 CFR 1502.25(a)) required by statute and include original research when relevant scientific data is lacking, unless the cost of obtaining that data is "exorbitant" or "the means to obtain it are not known" (40 CFR 1502.22). Since the *FEIR* was not required to contain this information, the

unabridged use of the conclusions presented in that earlier work effort cannot be directly utilized (or relied upon) without further augmentation.

Additionally, the alternatives analysis is the main focus of NEPA, requiring the EIS to "devote substantial treatment to each alternative in detail so that the reviewer may evaluate the comparative merits of each alternative" (40 CFR 1502.14(b)). Although the CEQA analysis addressed the "no project" (i.e., "No Build" Alternative) and four trainway/roadway configurations (i.e., Alternative 1 (at-grade trainway; 6-lane at-grade roadway); Alternative 2.1A (depressed trainway configuration; 6-lane at-grade roadway); Alternative 2.1S (depressed trainway configuration with sloping walls; 6-lane at-grade roadway); and Alternative 2.2 (similar to Alternative 2.1A except for Segment B-1)), the following NEPA analysis includes only two alternatives (i.e., "No Build" Alternative; Alternative 2.1B (depressed trainway; improved 4-lane roadway). Rather than either re-subjecting or expanding the alternatives analysis presented in the *FEIR* to further environmental review, the *DEIS* reduces the range of reasonable alternatives to only one build scenario and the no build alternative. By significantly reducing public discussion on project alternatives, the *DEIS* fails to fulfill the primary tenet of NEPA.

13.0 NOTICE OF INTENT

- In accordance with NEPA's noticing obligations, the federal lead agencies prepared and published (58 FR 65656 *et seq.*) a *Notice of Intent* (*NOI*). As indicated in that *NOI*, "the federal environmental document will be an EIS and *it will examine the alternatives previously examined in the DEIS and FEIR*, recognizing that a locally preferred alternative has been selected for implementation" (58 FR 95657) (emphasis added). Based upon this declaration, cooperating federal agencies, other commenting agencies and interested parties were led to believe that the *DEIS* would re-examine each of the alternatives addressed in the *FEIR* and provide a comparable level of analysis concerning those project options. In making this declaration, agencies and individuals formulated pre-circulation responses under the assumption that a range of reasonable alternatives would be addressed and evaluated therein.

  Notwithstanding the declaration in the *NOI,* the *DEIS* does not address the range of development scenarios presented in the *FEIR*; rather the *DEIS*'s evaluation of a range of "reasonable alternatives" included only "two alternatives that are considered in detail in this EIS [which] are (1) the No Build alternative and (2) Alternative 2.1B (a modification of Alternative 2.1A)" (p. S-11. *DEIS*).

  By limiting the alternatives analysis to only the "no build" alternative and the "preferred project" (Alternative 2.1B), the federal lead agencies' actions contradict the declaration presented in the *NOI* and, thereby, potentially foreclosing the number and nature of

comments which have been submitted thereupon. This potential defect is so onerous as to predicate the need for republication of the *NOI* and recirculation of the *DEIS*.

- In correspondence received from Mr. David J. Farrel, Chief of the USEPA, dated February 24, 1994, Mr. Farrel provides the following comment:

  The reissued NOI notes that (1) the EIS will "examine the alternatives previously examined in the Draft EIR and Final EIR," and (2) a "locally preferred" alternative has been selected for implementation." We [USEPA] *are very concerned that this might be contrary to the requirements that an EIS not limit the choice of reasonable alternatives [40 CFR 1506.1(a)(2)], and that by* ***selecting an alternative for implementation****, the NEPA process may be prejudiced on the basis of the project proponent's taking an interim action which could "determine subsequent development or limit alternatives [40 CFR 1506.1(3)]. We recommend that the Federal Highway Administration and the Federal Railroad Administration provide a full range of alternatives for evaluation in the EIS* (emphasis included in citation).

  The City concurs with the comments of the USEPA. As required under 40 CFR 1502.2(g), "environmental impact statements shall serve as the means of assessing the environmental impact of proposed agency actions, *rather than justifying decisions already made*" (emphasis added). The federal lead agencies' failure to fully consider a range of reasonable alternatives appears contrary to the intent of NEPA and has foreclosed effective public and agency participation in the environmental review and decision-making process.

- The federal notice and the *DEIS* misrepresents the preferred project by identifying that action as the "locally preferred alternative." The City is not aware of any formal consensus among affected agencies that the project identified as either Alternative 2.1A or Alternative 2.1B in the *FEIR* and *DEIS* constitutes the project endorsed by these agencies. In formal correspondence from the City to the federal lead agencies, the City has requested the consideration of a number of additional project alternatives which were summarily rejected.

14.0 DRAFT ENVIRONMENTAL IMPACT STATEMENT

The following comments are directed toward specific passages in the *DEIS* and address additional agency concerns, raise new environmental issues and/or request further technical analysis regarding specific aspects of the proposed project, alternatives to the "preferred project," and the potential direct, indirect and cumulative environmental effects that may result from the construction and/or operation of both the preferred project and other alternative transportation facilities, including both those alternatives addressed in the *DEIS* and those additional "reasonable alternatives" which were not examined (or not adequately evaluated) therein. Each of the comments which have been previously submitted by the City, as well as those additional comments presented herein and any

future comments which may be submitted by the City during the noticed public comment period or any authorized extensions thereto, require substantive response by the federal lead agencies. Although these comments are independent of the City's earlier comments (submitted by the City in response to its receipt of the *Notice of Intent*), by this reference, the City incorporates those comments herein and requests that the federal lead agencies augment their written responses thereto (as presented in the *DEIS*) prior to taking any final actions upon the proposed endeavor.

To facilitate the federal lead agencies' consideration of these comments (relative to information presented in the *DEIS*), the City has attempted to format these comments to correspond to distinct sections or references presented in the *DEIS*. All page numbers referenced herein are from the *DEIS*, unless otherwise noted.

14.1 Cover

- Although Caltrans is listed on the cover of the *DEIS*, the document indicates that "the Federal Highway Administration and the Federal Railroad Administration are serving as joint lead agencies" (p. S-26) for this project. By its inclusion on the cover of the *DEIS*, the document infers that Caltrans is also a joint State lead agency, as authorized under 40 CFR 1501.5(b) and 1506.2. What is Caltrans role hereunder? (1)

- In lieu of its own independent analysis of the proposed project, the federal lead agencies base their findings upon information presented in the *FEIR* ("the analysis reported in the EIR is a part of this EIS," p. 3-1, *DEIS*). Since the NEPA "preferred project" (Alternative 2.1B) is identified as only a "modification" (pp. 2-26 and 2-41, *DEIS*) of the project (Alternative 2.1A) as described in the *FEIR*, the absence of any continuing involvement on the part of the Alameda Corridor Transportation Authority (the CEQA designated "lead agency") raises questions concerning the continuing role of that agency in both the decision-making process and the subsequent implementation of the project. Why has the Alameda Corridor Transportation Authority (ACTA) not been identified as a joint lead agency hereunder? (2)

  Since many of the *DEIS*'s recommended mitigation measures may ultimately be the obligation of that agency, the reasons for the absence of any official involvement in the *DEIS* should be explained. Similarly, since no comment letters from the ACTA are included in the *DEIS*, it is unclear whether the ACTA has accepted, endorsed and/or committed to the implementation of these measures.

- The port authorities (e.g., Port of Los Angeles/ Los Angeles Harbor Department, Port of Long Beach) are neither listed as a joint lead agency nor as a responsible or cooperating agency in the *DEIS*. It should be noted, however, that the purpose of the project is to serve the San Pedro Bay Ports (p. 1-1, *FEIR*). The need for the Alameda Corridor project is a direct consequence of the San Pedro Bay Ports master plan, as described in the *Ports* (3)

EIR/EIS; therefore, the preferred project is inseparable from those activities outlined in that master plan. As a result, the port authorities constitute joint lead agencies for this endeavor and should be responsible for implementing the needed mitigation. (3)

14.2 Summary

- The *DEIS* clearly acknowledges that the "federal environmental process began with a Notice of Intent, published in the Federal Register on December 16, 1993" (p. S-31). Based upon the declaration that this disclosure document is intended to fulfill a "federal environmental process," the *DEIS* has an obligation to address and independently fulfill all requisite disclosure obligations as established under NEPA and its implementing regulations and guidelines.

  It is inappropriate to attempt to short-circuit the technical and procedural obligations therein through an over-reliance upon other environmental documents which were clearly not represented as undertaken for the purpose of federal environmental reviews ("the ACTA [Alameda Corridor Transportation Authority] withdrew from the federal environmental process and the process moved forward under the California Environmental Quality Act alone," p. S-1). If that earlier work effort had been clearly identified as a NEPA document, the level of analysis, nature of public and agency comments, range of reasonable alternatives and mitigation measures presented thereupon may have varied greatly from that now represented in the *FEIR*. Since no such representation was then made, it appears unreasonable to now attempt to categorize that CEQA document and the information contained therein as adequate for this federal process. (1)

- The *DEIS* acknowledges that the "Alameda Corridor is a consolidated railroad link between the ports of Los Angeles and Long Beach and the regional and national rail system" (p. S-1). By this reference the federal lead agencies acknowledge that the project does not exist in isolation; rather the proposed improvements are an integral component of a larger (e.g., regional; national) network. This linkage or relationship is graphically depicted in Figure S-2 (p. S-3) which connects the southern terminus with the Intermodal Container Transfer Facility and the San Pedro Bay Ports and the northern terminus of the Alameda Corridor to "points north" and "northeast, eastern seaboard, southeast, midwest, Gulf states and Mexico." (2)

  Despite this acknowledgment, the *DEIS* proceeds to limit the definition of the project to only "a 32-kilometer (20 mile) corridor, centering along Alameda Street, extending from downtown Los Angeles to the Ports of Los Angeles and Long Beach, within which is proposed consolidation of freight service to the Ports" (p. S-3) and since the "project would provide an efficient means of successfully realizing the San Pedro Bay Ports master plans' goals for growth of port activities to the year 2020" (p. S-42), the proposed project is

inseparable from those activities contemplated under the "San Pedro Ports master plans." Under this definition, the project is more fully described as the full build-out of the San Pedro Bay Ports (year 2020 plan) and all facilities ancillary thereto, not merely a limited roadway improvement project independent of other "reasonably foreseeable" related projects. If so redefined, the resulting EIS would more fully address potential cumulative effects associated with those activities and more effectively serve as a tool for informed decision-making. (2)

The *DEIS*'s narrow project perspective results in both a mischaracterization of the project and a minimization of potential project-related and cumulative impacts.

- The *DEIS* identifies "145 kilometers (90 miles) of tracks between the ports and downtown Los Angeles" (p. S-4). It is unclear whether the "90 miles" of rail lines referenced above are confined to the Alameda Corridor or include other trainways peripheral to the proposed project. Should project implementation result in the redistribution of rail service along rail lines and those roadways external to the Alameda Corridor, both the direct and indirect impacts of that redistribution constitute environmental effects which should be addressed in the *DEIS*.

  Since, during peak storm events, it will be necessary "to direct railroad traffic to existing rail lines" (p. 4-27), those alternative rail lines will experience traffic at volumes equal to or in excess of those volumes anticipated along the Alameda Corridor; thereby producing comparable environmental impacts to both the local street system and to properties adjoining those roadways, but without the corresponding mitigation proposed for the preferred project. Based upon this admonition, the "145 miles of tracks between the ports and downtown Los Angeles" must also be included as part of the expanded project description and, as appropriate, fully addressed in the *DEIS*. (3)

  In addition, the *DEIS* identifies two distinct activities in proximity to the project's southern terminus: (1) the *Port of Los Angeles Master Plan* (*Amendment No. 12*), which constitutes a "related project" (p. S-26) since its intent is to "accommodate cargo through the year 2020; and (2) the *Ports Access Demonstration Projects* which "would complement the improvements proposed as part of the Alameda Corridor project" (p. S-27).

- Although the *DEIS* indicates that "a set of goals were established for the project" (p. S-6), those goals are neither included in the *DEIS* nor is the "preferred project" or alternatives thereto evaluated in the context of their abilities to fulfill those policy objectives. Similarly, no comparative analysis is provided between project alternatives illustrating which implementation option will most effectively accomplish those stated ends. (4)

  Does the "project goals and criteria" outlined in the *FEIR* (pp. 2-1 through 2-5) represent the

"set of goals" referenced in the *DEIS*? If those same standards are utilized, the NEPA "preferred project" (Alternative 2.1B) would be judged to be less effectively in satisfying those "goals and criteria" than the "preferred project" (Alternative 2.1A) described in the *FEIR*. For example, by failing to adequately address areawide traffic demands, the 4-lane alternative will neither "promote economic development near and along the Alameda Corridor" (p. 2.1, *FEIR*) nor "maintain/improve access to existing businesses" (p. 2-2, *FEIR*); rather, the added congestion would serve as a disincentive to local businesses. (4)

- The *DEIS* references other on-going freight rail consolidation projects, including "consolidation scenarios from downtown Los Angles to San Bernardino" (p. 1-8). Should project implementation ultimately necessitate any related actions in proximity to the project's northern terminus to interconnect with other rail consolidation activities, those short-term and/or long-term actions are clearly activities which are consequences of and sequential to the proposed project and should, therefore, be addressed as part of this environmental analysis. If available, conceptual information should be excerpted from the *L.A. - Summit Regional Rail Consolidation Project* "due to be completed in the spring of 1995" (p. 1-8). (5)

- Since "a Final Environmental Impact Statement/Environmental Impact Report for the Port of Los Angeles' plan" (p. 2-44) was completed by the USACOE in September 1992, relevant excerpts from that document should be included in the *DEIS*, including any mitigation measures (e.g., "a stormwater runoff system will be designed to reduce the potential for unrestricted runoff," p. S-28, *Deep Draft Navigation Improvements, Los Angeles and Long Beach Harbors, San Pedro Bay, California EIR/EIS*) which may be directly or indirectly applicable to the proposed activity. Since expanded rail service "will be due in large part to the development of on-dock and near-dock railyards" (p. S-4) was the Alameda Corridor project addressed in the environmental documentation for either of the two above referenced projects? Conversely, it is unclear how the Alameda Corridor project can be examined in isolation of those on-dock and near-dock facilities, particularly in light of the *DEIS*'s conclusion that "the project would provide an efficient means of successfully realizing the San Pedro Bay Ports master plans' goals for growth of ports activities to the year 2020" (p. S-42)? (6)

- Are all demand projections and assumptions represented in the *Port of Los Angeles Master Plan* (*Amendment No. 12*) (p. S-26), in the "Final Environmental Impact Statement and Environmental Impact Report for the Port of Los Angeles' plan" (p. 2-44) and in the *DEIS* consistent? Are all planned, proposed, pending and completed *Ports Access Demonstration Projects* consistent with and complementary of those design plans outlined under the preferred alternative (i.e., Alternative 2.1B)? (7)

- In accordance with the *Deep Draft Navigation Improvements, Los Angeles and Long Beach Harbors, San Pedro Bay, California EIR/EIS* (USACOE, June 1992) (*Ports EIR/EIS*), (8)

regardless of port modifications, the volume of trains utilizing the various San Pedro Bay Ports access routes will increase and improvements to the regional rail systems will be needed.

Based on an analysis of past and present rail operations within and affecting the Ports of Los Angeles and Long Beach, it was concluded in the *2020 Terminal Island Transportation Study* (DeLeuw, Cather & Company, 1988) that without the proposed landfill and development of the landfill site, future baseline (i.e., without project) rail traffic in the Ports' area would not significantly increase over existing rail traffic by the target years 1995, 2010 and 2020. Citing a decline in rail traffic over the past years, it was assumed that, while the number of railcars composing each train may increase, the number of trains running over most of the lines will not increase significantly for the foreseeable future. More trips would be expected to the Port, but once into the network of rails, little increase is anticipated.

Future baseline rail traffic for the years 1995, 2010 and 2020 were derived from data provided in the *2020 Terminal Island Transportation Study* and the number of trains traveling along the Alameda Corridor is projected to increase from the then existing level of 12 and 30 operations per day south and north of the Intermodal Container Transfer Facility (ICTF), respectively, to 13 and 39 operations per day south and north of the ICTF, respectively, in the year 1995; and to 21 and 43 operations per day south and north of the ICTF, respectively, in both 2010 and 2020. It should be further noted that no additional growth was predicted along this line between the years 2010 and 2020. Based on these values, operations along this corridor are already at 62 and 91 percent of those projected south and north of the ICTF, respectively. (8)

Additionally, funding for a Carson Street overpass has been made available by the Southern Pacific Transportation Company (SPTC) and California Department of Transportation (funded under the California Grade Separation Act, fiscal 1986-87 and Federal Demonstration Program). The 1987 Federal Surface Transportation Assistance Act will provide funding to separate the yard from Del Amo Boulevard.

Other future planned improvements to the rail system include the rehabilitation of the Bager Avenue Bridge; a direct rail connection between the Santa Fe Railway and the SPTC San Pedro Branch at Thenard Tower; a direct rail connection of SPTC to the Badger Avenue Bridge; the Pacific Coast Highway interchange and separation; relocation of the HBL railroad yard; Terminal Island Freeway ramps and underpass at Henry Ford Avenue; and the Henry Ford Avenue underpass.

Further, as part of Pier 300, rail service to the ICTF is to be improved with the construction of a new two-track bridge over the Dominguez Channel; new railroad tie trackage from Earle Street main line; upgrades to the Terminal Island and Wilmington Trackage along this line;

and new at-grade intertie trackage at Thenard Junction and along Henry Ford Avenue south of Alameda Boulevard. With the inclusion of these future improvements, the *Ports EIR/EIS* concluded that the railroad lines will have sufficient capacity to carry the project rail operations and no significant impact was forecast.

Based upon these findings, the *DEIS* should identify and explain any potential rail volume discrepancies as identified in both the *Ports EIR/EIS* and the *DEIS*, and the potential ramifications of both the reduced projected railroad volumes and track and yard improvements in light of the "preferred project," especially on the basis of air quality and traffic circulation. (8)

- As indicated in the *DEIS* "a total of 99 million metric tons (109 million tons of cargo moved through the San Pedro Bay Ports in 1991..." (p. S-4). In accordance with information presented in the *Ports EIR/EIS*, this value was represented as only 79.78 million metric tons. In addition, the *DEIS* indicates that "based on current cargo forecasts, by the year 2020, the San Pedro Bay Ports are expected to handle 210 million metric tons per year" (p. S-4). In contrast, the *Ports EIR/EIS* estimates this value to be only 197.4 million metric tons. Based upon these potential inconsistencies, the *DEIS* should specifically reference its informational source (and source for its stated assumptions) and explain any and all potential inconsistencies between the *Ports EIR/EIS* and the *DEIS*. (9)

- Also referenced in the *DEIS* is the ICTF, located east of Alameda Street between the I-405 Freeway and Sepulveda Boulevard. As indicated therein "the ports are pursuing the implementation of on-dock and near-dock rail yards, which would make it possible to transfer containers directly from ship to rail, thus eliminating some of the truck trips that would otherwise be necessary to facilities such as the ICTF and other rail transfer facilities" (p. 1-6). Neither the ICTF, other rail transfer facilities nor expanded on-dock and near-dock rail yards are identified as "related projects" and analyzed in the *DEIS*. (10)

  Rather than attempting to piece-meal all related improvements associated with the projected growth of the San Pedro Bay Ports and the physical improvements required to accommodate future regional demands attributable to those facilities, a master program EIS should be developed as a basis for future project-specific activities. Has a programmatic document been developed and, if not, what defensible rationale exists for not undertaking that broad-based analyses?

- Despite the agency's obligation to comment upon the proposed project, the *DEIS* is noticeably absent of any written comments from the USACOE. Have written comments been received from that agency? (11)

- The *DEIS* indicates that those increased cargo demands which predicate the need for the (12)

Alameda Corridor project are due, in part, to the "attendant increase in the use of railroad service to distribute goods from Southern California to destinations throughout the country" (p. S-4). Although the *DEIS* does not disclose what percentage of increased cargo demands are locally generated, it appears that a significant percentage of the projected increase is intended not to serve local demands but to serve increased national demands for imported goods. Nowhere in the environmental documentation is the question raised (and addressed) concerning whether there may exist potential environmental and/or socioeconomic benefits in potentially diverting a portion of this projected growth to other west coast ports.

Since the declared purpose of NEPA is "to promote efforts which will prevent or eliminate damage to the environment" (42 USC 4321), all efforts should be expended both in the *DEIS* and in the decision-making process of the federal lead agencies to formulate plans which facilitate access to and from the San Pedro Bay Ports and minimize adverse effects upon adjoining receptors (and communities). Throughout the *DEIS*, the federal lead agencies assume that a pre-defined number of trains will utilize the Alameda Corridor. Based upon that number, the resulting environmental analysis has identified significant adverse effects upon the human environment (and has sought to alleviate those effects through the incorporation of specific mitigation measures). (12)

Nowhere in the *DEIS* is there an evaluation of a project alternative which might allow a lower number of daily rail trips. By reducing the maximum authorized use of the Alameda Corridor to that reduced number and/or restricting the hours of operation along that corridor, the identified environmental effects may be effectively alleviated and the public costs incurred in mitigation reduced.

Under this alternative demand strategy, performance standards could be developed which define acceptable environmental thresholds. Those thresholds would then form the basis for the determination of the number, type, frequency and hours of use of the Alameda Corridor. Rail demands in excess of that number would have to be diverted to other rights-of-way and/or other port facilities for transport to non-local designations.

If "the fundamental purpose of the Alameda Corridor project is to provide a means for improving goods movement by which the adverse consequences of increased freight rail traffic can be reduced" (p. S-4), then the range of available (and reasonable alternatives) would not be limited exclusively to a single number of trains which would be authorized to utilize the Alameda Corridor.

- Based upon the NEPA mandate that the alternatives analysis "is the heart of the environmental impact statement," the EIS has a greater obligation to "rigorously explore and objectively evaluate all reasonable alternatives." Although the Union Pacific San Pedro Branch (UPRR) alternative was eliminated in the *FEIR*, no objective analysis of that (13)

alternative was presented in the *DEIS*. As a result, compliance with NEPA requires that the resulting EIS include, at a minimum, the evaluation of another alternative transportation corridor (other than the Alameda Corridor). (13)

- Should the *DEIS* under-estimate the number of trains which will utilize the Alameda Corridor in the future (i.e., 97 trains/day in the year 2020, p. S-4), the resulting environmental analysis may fail to accurately project anticipated environmental impacts along that corridor. Since no supportive basis is provided for the *DEIS*'s projections, it is not possible to independently validate those anticipated future demands. Similarly, since "each affected railroad will be required to enter into an operating agreement" which will allow the collective (non-exclusive) use of the corridor, existing and future rail service may be diverted to this corridor from other privately-operated rights-of-way. As a result, the *DEIS* should present information supporting the assumptions provided therein, indicate whether the above projections reflect a worst-case scenario, evaluate the long-term implications of this non-exclusivity, indicate whether actual use may exceed anticipated demands, and extrapolate rail service growth beyond the year 2020. (14)

- As indicated in the *FEIR*, the UPRR alternative was eliminated, in part, based upon pre-analytical "comment letters" and a telephone survey (p. 2-30, *FEIR*). In earlier written comments, the City has formally requested the inclusion and subsequent analysis of a number of additional alternatives (i.e., a completely depressed and covered trainway and truckway through the City; a depressed facility through the central portion the City; a depressed and uncovered facility through the entire City) which, in the judgement of the City, would reduce or minimize the potentially adverse effects of the project upon this community. The City's request for additional alternatives analysis appears to have been given lesser weight than comparable requests for the elimination of alternatives. In the judgement of the City, these actions are contrary to the intent of NEPA. (15)

- A number of operational benefits are presented in the *DEIS* (pp. S-4 and S-5); however, the *DEIS* never provides a technical analysis which supports and defends the statements provided therein. Since the number of trains traveling along the Alameda Corridor will increase from "28 trains each day in 1990" (p. S-4) to "an estimated 97 trains per day" in the year 2020 (*Ibid*), it appears unreasonable to conclude that "locomotive hours of operation in the region can be reduced by 30 percent" (*Ibid*) and that "railroad emissions can be reduced by 28 percent" (*Ibid*). Since rail traffic will increase substantially over that time period, both the hours of operation and the associated emissions will increase over current conditions. The precise meaning and scientific basis for these statements should be identified. (16)

  Since "truck and automobile emissions projected for the 2020 project case are slightly higher than that for the 2020 No Project case" (p. 4-51, *FEIR*), no basis is presented to support the assertion that "auto and truck idling emissions associated with delays at grade crossings

would be reduced up to 54 percent" (p. S-4, *DEIS*).

As indicated in the *DEIS*, "impaired emergency access response would occur" during construction operations (p. S-39), "access by fire personnel could be compromised" (p. S-39) and "construction activities and traffic detours would produce impaired access" (p. S-40). Additionally, referencing the *FEIR*, "implementation of the consolidated corridor project could significantly delay the fire and emergency response time in some instances" (p. 5-235, *FEIR*). Based upon these declarations, no supportive information is provided to conclude that "delays to emergency vehicles can be substantially reduced" (p. S-5).

Since "the proposed project would result in increased noise effects at 2 schools located along the corridor" (p. S-39), the *DEIS* should provide information supporting the assumption that "adverse effects of future train movements on schools, such as noise and safety, can be reduced to a minimum" (p. S-5). (16)

The *FEIR* indicates that "the trench configuration poses operational problems for fire fighters" (p. 5-237, *FEIR*) and "implementation of the consolidated corridor project could significantly delay the fire and emergency response time in some instances" (p. 5-235, *FEIR*). Despite these declarations, the *DEIS* suggests that "safety and security issues such as the potential for motor carrier and railroad accidents and toxic spills can be effectively managed" (p. S-5). This issue has neither been adequately addressed nor sufficient information presented to support this contention.

- The*DEIS* indicates that the reasons that the Alameda Corridor was selected over the UPRR and Los Angeles River alternatives was primarily based upon the determination that the Alameda Corridor alternative was "shown to have the least residential population in the vicinity of its alignment" (pp. S-6 and 7). This statement suggests that residential proximity constitutes a condition which cannot be effectively mitigated (e.g., noise barriers). Since no evidence is submitted to support this contention (and substantial evidence is included in the *FEIR* and *DEIS* to suggest that effective mitigation strategies can be formulated), this rationale appears to provide an insufficient basis to eliminate these potential alternative alignments. Similarly, no information is presented in the environmental review record to support the statement that these alternatives "were found to have greater adverse consequences than the Alameda Corridor" (p. S-7). The *DEIS* should be augmented to present the substantial evidence in support of this conclusion. (17)

- The *DEIS* concludes that "the distinctions among alternatives were small" (p. S-8). Based upon this finding, it is clear that the alternatives selected failed to reflect a range of "environmentally different alternatives" (Section 1502.23, *CEQ Regulations*), thereby "sharply defining the issues and providing a clear basis for choice among options by decision-makers and the public"(Section 1502.14). (18)

- The analytical assumptions presented in the *DEIS* are often difficult to follow. For example, the document states that "the alternatives providing only four traffic lanes were eliminated because the traffic analysis showed that these options would carry less traffic than the six-lane options" (p. S-8). Conversely, "the locally preferred alternative for the Alameda Corridor project, Alternative 2.1B...exists as four lanes of two-way flow..." (p. S-13). Although intersection and turning improvements are proposed, no additional travel lanes are included under this alternative; thereby promoting a four traffic lane alternative as the preferred option. This apparent contradiction should be clarified. (19)

- The *DEIS* indicates that "a sensitivity analysis in which cost was eliminated as an evaluation factor was performed on the six-lane options, excluding Alternative 3" (p. S-13). This statement acknowledges the federal lead agencies willingness to disregard the cost of construction as an evaluative criteria, an approach which is strongly supported by the City. Despite this declaration that environmental factors outweigh economic constraints, this approach was not universally applied to all potential alternatives (e.g., Alternative 3). The *DEIS* further states that "an alternative that would have provided exclusive elevated truck lanes along Alameda Street (Alternative 4)...was dropped from further consideration because of its high cost" (*Ibid*) and "the two-way roadway with dual frontage roads alternative...was rejected for reasons of cost and impact" (p. 2-10). (20)

  Although decision-makers are required to make trade-offs between competing demands (e.g., environmental and socioeconomic), the environmental review process should be absent those considerations, placing environmental factors in the forefront of the EIS. Only following completion of the EIS should there be social debate concerning those potential trade-offs. As a result, the *DEIS* errors in prematurely eliminating potentially viable options based upon unspecified cost considerations (which are not disclosed in the *DEIS* and, therefore, not subjected to independent review).

- The*DEIS* discloses that "the options identified above as rejected were dropped from further consideration, and five alternatives were assessed in detail in the EIR" (pp. S-8 and 9). Although informative in summarizing the prior CEQA-based environmental process, over-reliance upon a State-mandated environmental compliance document as the disclosure vehicle for a federally-mandated review is inappropriate since federal environmental policies may place greater emphasis upon the lead agencies' role "as trustee of the environment for succeeding generations" (Section 101(b)(1), NEPA). As a result, a reconsideration of those options which have been rejected (including those alternatives formally identified by the City in correspondence to the federal lead agencies) are, therefore, warranted herein. (21)

- The following statements are contained in the *DEIS*: (1) "the five corridor alternatives assessed in detail in the Draft EIR received extensive public comment, and a *recommended* (22)

locally preferred project was identified as a result" (p. S-9) (emphasis added); (2) a "consensus [obtained] among the corridor cities" (p. S-10); and (3) "completion of the CEQA process has resolved all area of previous controversy" (p. S-27). These statements misrepresents the position of the City whose residents and business interests will be direct recipients of the potential adverse consequences of the proposed project. Throughout the public comment period, the City has attempted to encourage the federal lead agencies to include and evaluate a number of additional alternatives which, in the judgment of the City, will produce comparable transportation advantages, but with less adverse environmental consequences. Those alternatives continue to not be represented in the *DEIS* and the pursuit of alternative design options for Segments C-2 and C-3 remain as "areas of controversy/unresolved issues." (22)

As indicated in Section 4-2.8 of Caltrans' *Environmental Handbook: Manual of Instructions, Volume I (Caltrans Environmental Guidelines)*, Caltrans "will receive any comments [upon the draft EIS] and resolve any conflicting comments or issues..." Based upon these procedural obligations, the City requests Caltrans intervention in the resolution of these outstanding issues.

- The *DEIS* indicates that project effectuation will necessitate that "each affected railroad will be required to enter into an operating agreement which will govern the use of the corridor" (p. S-27). The general terms and conditions of those agreements are not, however, outlined and no further information is presented indicating the ability of the federal lead agencies to obtain those agreements. What specific conditions would be required therein? Are any project-related costs involved in securing those agreements? What impact would the non-obtainment of those agreements have upon the overall project? (23)

- Is there missing text between pp. S-27 and S-28? (24)

- Throughout the *DEIS* the federal lead agencies attempt to under-value the potential adverse effects of the proposed project and over-value any potential benefits attributable to that endeavor. The City has legitimate concerns about the project and its adverse environmental consequences and to disregard or diminish those concerns without sufficient technical rationale for those actions is a disservice to this community. For example, the *DEIS* concludes that "the analysis presented in the EIS suggests that Compton would receive benefits in excess of the adverse effects that may occur, but this remains a point of controversy to some Compton representatives" (p. S-28). This statement fails to reflect both the nature of the City's concerns and fails to demonstrate the federal lead agencies' objectivity in the faithful performance of its NEPA obligations. (25)

- To the *DEIS*'s list of "areas of controversy/unresolved issues," the following additional items remain outstanding: (1) the technical and procedural adequacy of the *DEIS* to faithfully fulfill (26)

all requisite disclosure obligations under NEPA and its implementing guidelines; (2) the document's failure to include a range of reasonable alternatives and to fully evaluate the potential environmental consequences associated therewith; (3) the documents failure to disclose or accurately define the threshold criteria utilized by the federal lead agencies to judge the significance of project-related and cumulative environmental impacts; (4) the adequacy of the project description, including the delineation and analysis of those related projects which contribute to the project's potential cumulative impacts; (5) the federal lead agencies' compliance with the mandates of both *EO 12898* and the *Intermodal Surface Transportation Efficiency Act of 1991;* (6) the defensibility of the federal lead agencies' interpretation of Section 450.318 of the Statewide and metropolitan planning regulations under ISTEA (p. S-29) and failure to undertake the preparation of a *Major Investment Study* as required therein; (7) failure to adequately respond to pre-circulation comments raised by the United States Environmental Protection Agency, including a request to prepare and incorporate into the *DEIS* an emergency response plan; and (8) the irretrievable commitment of land area in such fashion that future improvements to the Alameda Corridor right-of-way, as required to address the long-term and cumulative travel demands for that road and rail line, may be irreversible foreclosed. (26)

- In addition, the discussion of "areas of controversy/unresolved issues" (p. S-27) makes no mention of the issue of who is to pay for the remediation of contaminated soils and groundwater where no responsible party can be found or the responsible party lacks the funds for that remediation. Based on the areas that the trench and road improvements traverse, and the known, suspected and potential existence of contaminated sites, the cost to implement these remediation efforts could be considerable (e.g., hundreds of millions of dollars). This issue should be addressed in the *DEIS* and the cost of remediation included (and separately itemized) in the document's presentation of project-related costs. (27)

- In Section 4.3.2.2 of the *DEIS's* discussion addressing impacts and mitigation measures for significant historic resources, there is a *Finding of No Effect* for: (1) the Rancho Dominguez Adobe; (2) David Starr Jordan High School; (3) Pacific Electric Railway Watson Station; and (4) Ritter Elementary School. In addition, there is also a *Finding of No Adverse Effect* for the Redondo Junction Historic District. Despite these declarations, the summary table (Table S-1, p. S-41) references only the Watson Station, with no further discussion concerning the above referenced resources. Based upon the *DEIS* findings, all of the above resources should be separately cited. (28)

- Additional comments addressing the preliminary conclusions of the *DEIS*, as presented in the summary table (pp. S-32 through S-42), are presented under the corresponding topical headings herein.

14.3 Chapter 1: Purpose and Need for the Project

- The *DEIS* indicates that the "composition of goods moving through the ports is expected to change as time goes on. In 1991, containers accounted for 25 percent of the total tonnage handled at the ports...by the year 2020, 37 percent of total tonnage [will be containerized]" (p. 1-4). Based upon this "shift in composition of goods...rail service will assume a larger role in the future than it has in the immediate past...Recognizing this, the ports are pursuing the implementation of on-dock and near-dock rail yards...The principal effects of on-dock transfer would be: an increase reliance on railroad service out of the ports, and a projected 63,000 daily truck movements in the year 2020 would be reduced by 23 percent to 49,000 daily truck movements by on-dock rail operations" (p. 1-6). Since no comparable projections can be identified in the *Ports EIR/EIS*, the *DEIS* should provide documentation supporting these projections. (1)

- The *DEIS* indicates that "the number of containers handled at the port is expected to grow by an estimated 208 percent by the year 2020" (p. 1-4). Based upon overall growth projections and, more specifically, the increase in containerization, the *DEIS* concludes that the only means to transport these materials is by means of increased rail service. Nowhere in the *DEIS* is there a discussion of the alternative to expand trucking operations (in lieu of expanded rail service) as a means of materials conveyance. Although there may exist overriding reasons why this alternative was not examined, the absence of any discussion suggests that this transport option was never considered. As a result, the *DEIS* should be expanded to either include this alternative technology or explain the rationale for its non-inclusion therein. (2)

- The statement that "unless the [Alameda] Corridor can be implemented, more noise, air pollutant emissions and traffic delays will be spread throughout the region" (p. 1-6) appears both self-serving and directed toward the promotion of the proposed project. In reality, based upon the anticipated growth of cargo traffic, added noise, air pollutants and traffic will be introduced into the region notwithstanding whatever actions finally occur relative to the project. The inclusion of such statements appears contradictory to Section 101(d) of NEPA, which states that federal officials are responsible "objectivity" of the resulting analysis. Similarly, Section 1502.1 of the *CEQ Regulations*, indicates that the purpose of an EIS is to "provide full and fair discussion" of the project's significant environmental impacts. (3)

- As indicated in the *DEIS* for the "no build" alternative, "an estimated 70 trains per day in 2010 and 100 trains per day in 2020, are projected" (p. 1-7). This projection exceeds the number of trains identified (and evaluated) for the "preferred project" (i.e., 97 trains/day in the year 2020, p. S-4). Based upon this apparent inconsistency, the *DEIS* should explain why more train trips will originate under the "no build" alternative than now anticipated for the proposed action. Additionally, as indicated in the *Ports EIR/EIS*, only 43 trains are (4)

anticipated northerly of the ICTF for years 2010 (Figure 4F-5, p. 4F-16) and 2020 (Figure 4F-6, p. 4F-17), based upon "future baseline rail traffic...derived from data provided in the 2020 Terminal Island Transportation Study" (p. 4F-14). The basis for the *DEIS*'s future year train projections should be documented and examined in the context of other available information containing comparible projections. (4)

14.4 Chapter 2: Alternatives Considered

- The *DEIS* states that the "federal environmental process began with the Notice of Intent" (p. S-31). Based upon this declaration, the *DEIS* appears precluded from utilizing the *FEIR* as the basis for either the rejection of alternatives (p. 2-1) or there non-inclusion herein. It further appears unreasonable to assume (based upon that earlier CEQA process) to confine the resulting NEPA analysis to only "the No Build alternative and Alternative 2.1B" (*Ibid*). (1)

- In addressing project goals, the *DEIS* appears to confuse the stated goal to "maximize cost effectiveness" (p. 2-1) with the unrelated concept of the actual cost of construction. The *DEIS* previously indicated that a number of potential project alternatives were eliminated from "further consideration because of high cost" (p. S-13) and/or "rejected for reasons of cost and impact" (p. 2-10). Although "the two-way roadway with dual frontage roads alternative...would permit the highest level of service along Alameda Street, while at the same time maximizing access to properties on either site" (*Ibid*), that alternative was subsequently rejected because of cost considerations. Although that option may have had a high initial cost, the *DEIS* indicates that it also had the highest potential benefit. How were these two variables compared? (2)

  These statements appear to suggest that neither "effectiveness" or "value" were considered as part of the alternatives analysis, only the amount of money required for project implementation. Has a cost-effectiveness evaluation been conducted or has only a cost of construction projection been preformed? How is effectiveness defined? What dollar values are assigned to each of the herein analyzed environmental variables?

- The entire argument relative to cost factors appears over-inflated. As indicated in Table 2-2 (Alameda Corridor Alternative Configurations) (p. 2-11), there exists only a small variation between the alternative with the highest construction cost (Alternative 4.0: $2.05 billion) and the earlier version of the preferred alternative (Alternative 2.1A: $1.78 billion). In recognition of this limited differential, it appears unreasonable to place over-emphasis on cost factors as a deterministic criteria in the EIS, particularly in light of the current intent to seek federal funding for construction operations. (3)

- The title of Table 2-2 (Alameda Corridor Alternative Configurations) (p. 2-11) is misleading since not all alternatives referenced in the *DEIS* are, in fact, represented in that table. (4)

Absence from discussion are: (1) Alternative 2.1B (representing the preferred alternative as addressed in the *DEIS*); (2) Alternative 2.1S, subsequently "rejected due to its right-of-way requirements" (p. 2-16) notwithstanding that right-of-way costs are factored into Table 2-2; (3) the UPRR alternative corridor; (4) the Los Angeles River alternative corridor; and (5) the UPRR/Los Angeles River combined alternative corridor. Each of the above referenced alternatives should be incorporated into an expanded comparative analysis. (4)

- No corresponding discussion of Alternatives 2.3, 2.4, 3.0, 4.0, 5.0, 6.1, 6.2, 6.3 or 6.4 are provided in the text following Table 2-2 (Alameda Corridor Alternative Configurations) (p. 2-11). Since Alternatives 1.0, 2.1A and 2.2 are each individually described, it is unclear why a comparable discussion is not offered for the above referenced alternatives?

- No cost factors are presented for the "no build" alternative (p. 2-11). This absence may be due in part to the assumption that "these improvements would be undertaken by each of the three [affected] carriers, in response to their own operational needs" (p. 2-21). Since these costs reflect private (rather than public) costs, their inclusion in Table 2-2 (Alameda Corridor Alternative Configurations) may be deemed to be unwarranted. What percent of the total project costs (for each of the identified alternatives) represented in Table 2-2 are public costs verses private costs? If private costs are eliminated from those estimates, what is the resulting public cost of construction? (5)

- The*DEIS* indicates that south of the SR-91 Freeway, "Alameda Street is being improved by the *Ports Access Demonstration Projects*...Alameda Street improvements would pass beneath the consolidated trainway and occupy a position on the east side of the trackage" (p. 2-14). Are the *Ports Access Demonstration Projects* being conducted independently or in coordination with the Alameda Corridor project? Have the *Ports Access Demonstration Projects'* improvement presupposed a particular alignment and/or design configuration for the Alameda Corridor? (6)

- Alternative 1.0 was rejected, in part, because it would "require up to 17,287 lineal meters (60,000 lineal feet) of soundwalls which was seen as creating a substantial neighborhood barrier and be subject to graffiti" (pp. 2-14 and 2-24). The *DEIS* should evaluate how a depressed trainway configuration involving a "trench that would be approximately 9 meters (30 feet) deep below existing Alameda Street" (p. 2-9) would not be expected to produce a comparable neighborhood impact or provide an equal attraction to graffiti taggers. (7)

- Rather than presenting a complete analysis as part of the *DEIS*, that document repeatedly directs the reader to corresponding passages in the *FEIR* (e.g., "for a more detailed discussion of typical sections and corridor configurations under this alternative, see Section 3.2 of the EIR," p. 2-14). This approach does not facilitate public review of the document or allow a complete airing of the project's alternatives, environmental impacts and (8)

recommended mitigation measures. 8

- In defending the need for the project, the *DEIS* indicates that "rail movements are expected to increase over time, from an estimated 28 trains per day in 1991, to 73 in the year 2010 and 97 in the year 2020 (p. 1-6). The *DEIS* later acknowledges that "total through train movements to and from the ports are expected to reach 73 per day by the year 2010 and 97 per day by the year 2020" (p. 2-20). Although the term "through trains" is not defined in the text and only marginally defined in the "glossary," the *DEIS* clearly differentiates between "through train" trips form "local train movements" (p. 2-18). Since "through trains" are not "local trains," by inference, these train trips are related to non-local (i.e., external to the Los Angeles metropolitan area or not routed to end users situated along the Alameda Corridor) demands. Based upon this interpretation, 100 percent of all trains projected to utilize the Alameda Corridor are defined as "through trains" which will be transporting materials not to local consumers but to out-of-the-area users. If, in fact, the Alameda Corridor project is not intended to directly benefit local access to imported products, how will project implementation benefit the residents and businesses within the region? 9

  Additionally, since "an existing drill track would continue to be provided at grade, adjacent to the main track" (p. 2-9), it appears that not all rail traffic along the Alameda Corridor has been considered as part of the environmental analysis. Should the *DEIS* underestimate the number or frequency of all rail traffic along this right-of-way, the resulting analysis may not accurately reflect post-project conditions or consider the full range of mitigation measures to reduce or avoid those larger impacts. As a result, the assumptions utilized in the derivation of the document's conclusions should be reexamined and, if required, each of the technical analyses augmented to more precisely reflect the project's direct, indirect and cumulative environmental effects.

- The *DEIS* utilizes specific terminology without providing clear and concise definitions of the terms which are utilized. For example, the document indicates that "overland common point (OCP) traffic will account for 50 percent of all containerized cargo" (p. 2-20); however, the lay reader is never offered a definition of "OCP traffic" nor told the importance (and ramifications) of the assumptions presented in the *DEIS*. This over-reliance upon technical terms inhibits the ability of the public to submit meaningful comments upon the draft document. 10

- It is unclear how "the operation of passenger service on these [UP and ATSF rail] lines would have a direct effect on the efficiency of freight movements into the corridor study area from the north" (p. 2-22). The *DEIS* should elaborate upon this statement so to more precisely define both its intent and describe how "efficiency" would be affected? Are any passenger operations anticipated or reasonably foreseeable along the Alameda Corridor right-of-way? Have these operations been considered as part of the assumptions for the 11

environmental analysis? (11)

- In presenting the agencies' rationale for the selection of Alternative 2.1A (in the *FEIR*), while rejecting the other alternatives analyzed in that CEQA-based document, a number of the factors which are stated appear fallacious. For example, in rejecting the at-grade alternative (Alternative 1.0), the document states the need to "require corridor traffic to use local streets to reach grade crossing structures" (p. 2-24); this same argument is used to support the preferred project ("eliminate the need for the use of local streets to reach grade separations," p. 2-25). The document, however, fails to note that under the depressed trainway alternative (Alternative 2.1A), local streets will be required to access those bridges (i.e., street overpass) which will be required to cross over those depressions. (12)

- The *DEIS* indicates that the CEQA process "was completed by the ACTA Governing Board in January 1993, by: (1) certification of the Final EIR, (2) adoption of the 'locally preferred' project, (3) adoption of Findings and Statement of Overriding Considerations, (4) adoption of a Mitigation Monitoring Program and (5) filing of a Notice of Determination reflecting the above actions" (p. 2-26). Based upon these actions, the "EIR" collectively comprises the "Final EIR" (i.e., Draft Environmental Impact Report and Response to Comments), "Findings and Statement of Overriding Considerations," and "Mitigation Monitoring Program." Since the *DEIS* indicates that "the analysis reported in the EIR is a part of this EIS" (p. 3-1), is it reasonable to assume that each of the above referenced CEQA components are "part of this EIS"? (13)

  What is specifically meant by the statement that "the EIR is a part of this EIS"? Was the complete *FEIR* circulated with the *DEIS*? Have all technical appendices and focused technical studies identified in the *DEIS* and *FEIR* been circulated with the *DEIS*?

- Although each of the *Ports Access Demonstration Projects* "will undergo separate environmental review" (p. 2-42), the related nature of these activities necessitates their inclusion as part of the cumulative impact analysis in the *DEIS* and not merely their consideration as "part of the No Build Alternative" (*Ibid*). (14)

- Insufficient information is currently provided concerning anticipated construction activities and schedules along the Alameda Corridor right-of-way. Since "impaired emergency access response would occur" during construction operations (p. S-39), "access by fire personnel could be compromised" (p. S-39) and "construction activities and traffic detours would produce impaired access" (p. S-40), the *DEIS* should more thoroughly explore both construction-term impacts and potential activities that may be undertaken to reduce or avoid adverse consequences upon those residents, employees and business interests along that roadway. What, if any, actions can be undertaken during the "three to four years" (p. 2-43) construction period to maintain the current use of area roadways and minimize community (15)

and regional impacts?

- The *DEIS* does not indicate what hours (e.g., 24-hour work schedule) and what days (e.g., 7-day work week) have been assumed or are anticipated for the proposed project.

- Although the *DEIS* indicates the "major steps" (p. 2-43) involved in constructing the Alameda Corridor project, no explanation and/or environmental evaluation of those distinct activities is provided therein. For example, the "relocation of utilities" is indicated as the first construction sequence; however, no discussion is provided concerning: (1) which utilities will require relocation; (2) whether additional easements or rights-of-way will be required; (3) where the utilities will be relocated; (4) whether any upgrades (e.g., undergrounding) are proposed; (5) whether disruptions in service can be anticipated; (6) whether temporary stop signs may replace electronic signalization (or whether flagmen will be utilized); (7) detour and/or rerouting plans; (8) whether construction vehicles will be stored on-site or removed at the end of each work day; (9) where excavated materials are to be stockpiled pending there reuse or off-site export; (10) the types and anticipated need for temporary erosion-control devices and fugitive dust controls; (11) on-site monitoring activities pursuant to conditions of approval established under both CEQA and NEPA; and (12) proposed temporary fencing and related security features.

- The projected construction period for "any one location north of the Artesia Freeway is anticipated to be as long as three or four years" (p. 2-43). As further indicated in the *DEIS*, "trains would not be able to use the trench until the entire corridor was completed north of the Artesia Freeway" (*Ibid*). During that construction period, all train traffic currently utilizing that trainway would have to be diverted to one or more alternative rights-of-way, thereby creating a short-term impact upon those alternative travelways and the land use and vehicular roadways proximal thereto. These off-site impacts are not, however, addressed in the *DEIS*. (15)

- The *DEIS* states that "one aspect of the depressed trainway construction that could have an important bearing on the ease or difficulty of the construction process is the manner in which excavated material would be removed from the area. One approach that has been discussed would use rail cars which would transport the excavated material south to the ports for use as a landfill. The other more common option would be to remove the material by truck. As the beginning of construction nears, specific disposal sites and truck routes for hauling dirt will be determined" (p. 2-43).

  Since "trains would not be able to use the trench until the entire corridor was completed north of the Artesia Freeway" (p. 2-43), it is unclear how excavated materials could be transported by rail cars "south to the ports for use as landfill" (p. 2-43). This apparent inconsistency should be clarified and the amended or supplemental EIS expanded to address

the methods and potential locations for these exported materials. Additionally, the estimated number of haul vehicles should be identified, an appropriate depository (e.g., Class III landfill) identified, and the resulting environmental effects (e.g., traffic impacts, air pollutant emissions) quantified and evaluated.

- No information is contained in either the *DEIS* or *FEIR* that specifies what will be done with excavated material or what types of testing will be performed on these materials to determine if hazardous constituents are present. After all mandated testing of excavated debris is performed, materials which are found not to be hazardous (e.g., inert construction and demolition debris) could then require transport to the San Pedro Bay Ports. The other option mentioned is to transport the material to a solid waste or unclassified (inert) landfill.

  According to the *Los Angeles County Source Reduction and Recycling Element* (*SRRE*), most of the inert materials disposed of at Class III solid waste landfills generally have some organic constituents mixed in and are unacceptable for disposal at unclassified (inert) landfills which can receive only pure loads of inert materials. Most construction and demolition waste generated is disposed of in unclassified landfills that have "strict requirements for disposal of inert materials. Toxic materials are not permitted in these landfills, and must be removed before dumping" (p. 6-4, *SRRE*). If the federal lead agencies intend to transport the material to the San Pedro Bay Ports, specific plans should be formulated and included in the *DEIS* that show the location of where these materials will be stockpiled and/or legally dumped, specific permitting requirements for disposal and responsible monitoring agencies and a delineation of environmental impacts associated with this disposal option. (15)

- Based upon the known number of contaminated sites within the project area (p. 3-36 *et seq.*), it is reasonable to assume that construction activities, including excavation, will encounter areas of known or suspect contaminants. Unless effectively monitored and mitigated, those contaminated soils could be improperly excavated, transported and disposed. Since the *DEIS* indicates that excavated materials may be transported "south to the ports for use as landfill" (p. 2-43), the placement of that material into the San Pedro Bay Ports has the potential to adversely affect marine ecosystems and regional efforts to improve the water quality of that area. Based upon this declaration ("use as landfill"), what mechanisms are proposed or in place to ensure that all contaminants encountered during construction are appropriately handled? (16)

- Since the *DEIS* acknowledges that specific materials encountered during project construction and/or operation will necessitate either on-site remediation or transport to an approved Class I or Class II landfill (e.g., "removed water and muck could necessitate wastewater treatment and possible transport of muck to a Class I or Class II landfill," p. 4-25; "separated materials [associated with surface water contaminants] will be trucked to a Class I or Class II disposal (17)

site," p. 4-30; "contaminated soil would be excavated and transported to an appropriate disposal site or landfill," p. 4-33), the *DEIS* should discuss any proposed and/or secondary methods for remediation and should identify a potential authorized depository should on-site remediation prove infeasible. What quantity of contaminated materials can be reasonably anticipated? How will the on-site disposal of those materials impact the remaining capacities of those Class I and Class II sites? What controls are in place to ensure the safe transport of those materials? How will unauthorized disposal be monitored? What, if any, additional mitigation measures are recommended?

(17)

Should the federal lead agencies elect to undertake on-site remediation (e.g., soil vapor extraction; soil flushing; stabilization and solidification; aeration; steam stripping; bio-remediation; containment; in situ vitrification), the method of that remediation should be delineated and the selected technology identified. Additionally, since remedial investigation and the preparation of a feasibility study will be required before any remediation can occur, the *DEIS* should acknowledge this obligation and, if appropriate, include this requirement as a mitigation measure.

- Hazardous waste is defined under the Resource Conservation and Recovery Act (RCRA) as a solid waste (including liquids and gases) or a combination of solid wastes which may, because of its quantity; concentration; or physical, chemical or infectious characteristics cause or significantly contribute to an increase in mortality or in serious irreversible, or incapacitating reversible, illness or pose a substantial present or potential hazard to human health or the environment when improperly treated, stored, transported, disposed of, or otherwise managed. The federal lead agencies must determine, through required testing, whether excavated materials are hazardous, and whether these materials constitute a public hazard. What monitoring activities are proposed or recommended to ensure the adequate identification and testing of these materials?

(18)

- Should hazardous materials be identified, the federal lead agencies may be required to perform a health risk assessment that would include: an identification of hazards; a toxicity assessment; an exposure study of affected populations; and a characterization of risk to those affected populations. In recognition of this obligation, the *DEIS* should describe those situations for which a health risk assessment would be performed.

(19)

- Should the federal lead agencies choose to excavate construction debris, and if this material is tested and found to be hazardous, disposal at a Class I or Class II landfill will be required. The closest Class I landfill is the Kettleman Hills Landfill, located in Kings County. Class II landfills are located in Kern and San Bernardino counties. Selection of either of these disposal alternatives will require the delineation of freeway access routes and the number of truck trips required for complete transport and disposal of all hazardous wastes generated by the project. Implementation of this alternative will require that the federal lead agencies (or

(20)

construction contractor) select an EPA certified hazardous waste hauler. Disclosure of the selected haulers's business history (e.g., years established; types of hazardous waste materials hauled; safety and spill cleanup records) is vital for determining probable success and relative safety. At the project site, operational methods for on-site excavation (and types of equipment used), handling, containment and storage of hazardous materials should be indicated. Special emphasis should be placed on the procedures utilized for maintaining worker safety and how risk of upset conditions (e.g., public safety; spills) will be mitigated both during excavation and during the transportation of hazardous waste materials. (20)

- Although inert materials excavated along the Alameda Corridor right-of-way may be transported "south to the ports for use as landfill" (p. 2-43) for placement into the San Pedro Bay as "dredged or fill material" (as defined in Section 404 of the federal Clean Water Act), the *DEIS* does not identify potential future permitting obligations associated with the United States Department of the Army Corps of Engineers (p. S-28), California Department of Fish and Game, Regional Water Quality Control Board or the California Coastal Commission (e.g., "consistency certification and a coastal development permit," letter from Mr. Mark Delaplaine, Federal Consistency Supervisor, California Coastal Commission, dated February 1, 1994 and included in Appendix F of the *DEIS*). Since the *DEIS* declares this intended use, the *DEIS* is required to evaluate the potential direct and indirect effects of this action, notwithstanding whether those same effects have been addressed in "a Final Environmental Impact Statement/Environmental Impact Report for the Port of Los Angeles' plan" (p. 2-44). (21)

- Appendix E (Summary of the Scoping Process) of the *DEIS* includes a summary of responses received during the scoping period. Included within this appendix is a comment from the Los Angeles Unified School District, stating "the environmental effects of hauling excavated material should be discussed in the EIS." The respondent then states "the effects of hauling excavated material were previously discussed in the EIR and no additional effects are anticipated in the EIS" (p. E-4).

The impacts of excavating potentially hazardous materials, transporting these materials to a final disposal site, and the operations associated with final disposal are neither discussed in the *DEIS* nor in the *FEIR*. Additionally, these documents do not include solid waste generation rates for construction and demolition debris that would be excavated during the construction phase of the project. Determining the tonnages of these materials that would be generated by the project is vital so that impacts to the existing solid waste disposal system in Los Angeles County can be analyzed. At the present time, Los Angeles County solid waste landfills have very limited capacity and the additional burdens placed upon this system by large-scale construction projects constitutes a significant environmental impact. (22)

Based upon the presence of this construction-related impact, a pre-circulation request for the analysis of this topical issue, potential inconsistencies between the project and the County's

current solid waste management plans and strategies and the current absence of discussion relative to these issues in the *DEIS* and *FEIR*, the City requests that a detailed investigation of the potential direct, indirect and cumulative effects of solid waste generation and disposal, inclusive of both construction and operational impacts, be addressed in an augmented or supplemental environmental analysis. (22)

- Appendix F of the *DEIS* includes a letter by Mr. David J. Farrel, Chief, of the United States Environmental Protection Agency (USEPA), Region IX, Environmental Review Section, where a request is made to the FHWA California Division that "...the *DEIS* contain a wide variety of pollution prevention measures, which may include water and energy conservation features, solid waste recycling, and hazardous waste minimization. Appropriate commitments to implement such measures should also be included in the *DEIS*" (David J. Farrel, USEPA, letter dated June 3, 1994).

  In the *DEIS*, no attempt has either been made to address this comment or to examine the recycling of construction and demolition debris generated during the construction phase of the project as an impact or mitigation measure. Although the *DEIS* includes, as a mitigation measure, the statement that "asphalt taken form roadways will be recycled, to the extent that this is practicable [sic] and cost-effective" (p. 4-47), the stated mitigation measure imposes no obligation upon the federal lead agencies (or construction contractor) to commit to recycling as a policy and is, therefore, unenforceable. (23)

  One of the goals of the Los Angeles County's *SRRE* is "reduce or eliminate the disposal of inert waste in Class III solid waste landfill facilities within the short-term planning period (1991-1995)" (p. 6-1, *SRRE*). In the event deposition of excavated material into the San Pedro Bay Ports is deemed impractical or infeasible, the federal lead agencies' alternative plan is the disposal of this material in County landfills. This latter action clearly violates the intention of the *SRRE* to recycle, to the extent possible, these inert materials. In accordance with the County's goals, the federal lead agencies should prepare and present a disposal plan designating how inert solid wastes will be segregated and recycled.

14.5 Chapter 3: Affected Environment

- As indicated above, the *DEIS* must independently fulfill all disclosure obligations as required under NEPA and its implementing guidelines and cannot rely upon other non-federal environmental documentation as the sole basis for subsequent discretionary federal actions. By limiting the information presented therein to only those "impact areas for which additional analysis/documentation, beyond what is included in the EIR" (p. 3-1), the federal lead agencies presents the public with, at best, a confusing and incomplete analysis and, at worse, an incomplete technical evaluation of the potential direct, indirect and cumulative environmental effects of the proposed project. Since the *FEIR* was never represented to be (1)

a NEPA document, it cannot be merely referenced and, by that reference, utilized to fulfill federal disclosure requirements. (1)

- In accordance with Section 1502.15 of the *CEQ Regulations*, the EIS "shall succinctly describe the environment of the area(s) to be affected or created by the alternatives under consideration...Data and analyses in a statement shall be *commensurate with the importance of the impact*" (emphasis added). As drafted, the *DEIS* fails to comply with this requirement. For example, Table S-1 (Alameda Corridor Summary of Impacts) in the *DEIS* indicates that the following significant adverse impacts will occur as a result of either the preferred project or "no build" alternative: (1) air quality (p. S-34); (2) noise (p. S-35); (3) land use (p. S-37); (4) transportation and circulation (p. S-38); (5) public services (p. S-39); (6) safety and security (p. S-40); and (7) economics (p. S-42). The *DEIS*'s analysis of the "affected environment," however, "reviews the environmental setting for air quality, cultural resources, hydrology and water quality, hazardous materials and vegetation and wildlife analyses" (p. 3-1). If "importance of the impact" is defined as the post-project level of significance, no relationship exists between the discussion of the affected environment and the importance (i.e., significance) of the potential project-induced environmental effects. (2)

- As indicated in Section 1508.27 of the *CEQ Regulations*, the term "significant" requires consideration of both context and intensity. In defining *context*, Section 1508.27(a) indicates that the "action must be analyzed in several contexts such as society as a whole, the affected region, the affected interests, and the locality...in the case of a site-specific action, significance would usually depend upon the effects in the locale rather than in the world as a whole. Both short-term and long-term effects are relevant." As indicated therein, it is the effects upon the local community which should influence the federal lead agencies' determination of significance.

  In defining intensity, Section 1508.27(b) states that a number of factors should be considered in evaluating project-related impacts, including: (1) the degree to which the effects on the quality of the human environment are likely to be highly controversial; (2) the degree to which the possible effects on the human environment are highly uncertain or involve unique or unknown risks; (3) the degree to which the action may establish a precedent for future actions with significant effects or represents a decision in principle about a future consideration; (4) whether the action is related to other actions with individually insignificant but cumulatively significant impacts (i.e., significant exists if it is reasonable to anticipate a cumulatively significant impact on the environment); and (5) whether the action threatens a violation of federal, State or local laws or requirements imposed for the protection of the environment (e.g., exceedance of local air quality standards notwithstanding the absence of comparable federal standards). (3)

  In this context and based upon the information now provided in the *DEIS*, the following

additional post-mitigated environmental effects should be deemed as "significant" for the preferred project alternative: (1) "emissions of criteria pollutants and fugitive dust would be produced in quantities above significance thresholds established by the SCAQMD" (p. S-34); (2) "the proposed project would require up to 40 full acquisitions and up to 16 partial acquisitions of commercial properties. Some businesses may have substantial difficulty in relocating" (p. S-37); (3) "impaired emergency access response would occur" during construction operations (p. S-39); (4) "access by fire personnel could be compromised" (p. S-39); (5) "the proposed project would result in noise impacts at one church" (p. S-39); (6) "construction activities and traffic detours would produce impaired access" (p. S-40); (7) "some businesses at properties that would be acquired for the project may not be able to relocate and therefore would close" (p. S-42); and (8) "some losses in local sales tax and business license revenues would occur" (p. S-42). In addition to the above referenced "significant" effects, further analysis required by the lead federal agencies as a result of the comments raised herein should result in a re-evaluation of a number of additional environmental effects currently deemed (by the lead federal agencies) to be less than significant. 3

- As indicated in Section 1500.1(b) of the *CEQ Regulations*, "NEPA procedures must insure that *environmental information is available to public officials and citizens* before decisions are made and before actions are taken. The information must be of high quality. Accurate scientific analysis, expert agency comments, and public scrutiny are essential to implementing NEPA." Section 1500.1(c) further states that "the NEPA process is intended to help public officials make decisions *based on understanding* of environmental consequences, and take actions that protect, restore, and enhance the environment" (emphasis added). "Verbose descriptions of the affected environment are themselves no measure of the adequacy of the environmental impact statement" (Section 1502.15, *CEQ Regulations*). 4

  As presently structured, the *DEIS* neither insures the availability of environmental information (e.g., the *FEIR* is not circulated with the *DEIS*) nor presented in a manner which facilitates its clear understanding (e.g., "high quality"). In addition, information is presented which does not directly appear to relate to any of the potentially significant effects identified in the *DEIS*. As a result, the information presented and the format selected by the lead agencies is inconsistent with the purpose of federal environmental policies. To rectify this deficiency, the *DEIS* should be redrafted (e.g., to focus upon potentially significant adverse environmental impacts) and subsequently recirculated to allow for additional public and agency review.

- The *DEIS* states that "the analysis reported in the EIR is a part of this EIS" (p. 3-1). This statement does not, however, indicate whether reference to "the EIR" is to the *Draft Environmental Impact Report* (*DEIR*) or to the *Final Environmental Impact Report* (*FEIR*). Additionally, the *DEIS* only states that "the analysis...is a part of this EIS." No reference is 5

provided indicating that the mitigation measures have been faithfully brought forward or will be adopted in any resulting *Record of Decision*. Since the "findings" and "statement of overriding considerations" (as required under Sections 15091 and 15093 of the California Code of Regulations) have not been referenced by the above comment, it is unclear whether these components of the project's environmental review record have either been considered, recirculated for public review or, themselves, are "part of this EIS."

In adopting "findings" and a "statement of overriding considerations," did the Alameda Corridor Transportation Authority (in that agency's role as lead agency under CEQA), revise, delete or otherwise modify any of the mitigation measures recommended in the *FEIR*? Is a complete itemization of those adopted measures included in the *DEIS*? Does the *DEIS* include a declaration from the federal lead agencies committing those agencies to the re-adoption of all mitigation measures included in the *FEIR* or subsequently revised through the "findings" and "statement of overriding considerations"? (5)

When the federal lead agencies indicate that "the analysis reported in the EIR is a part of this EIS" (p. 3-1), the full meaning of that comment is both unclear and requires further elaboration.

- In introducing the scope of the environmental review presented in the *DEIS*, the draft document indicates that further environmental analysis is only required for "air quality, cultural resources, hydrology and water quality, hazardous materials and vegetation and wildlife analyses" (p. 3-1). No explanation is, however, provided indicating why these four topical issues are addressed and the other topical considerations ignored. Since the NEPA "preferred project" (Alternative 2.1B) is not the same project as represented as the CEQA "preferred project" (Alternative 2.1A) each of the topical issues identified during the CEQA/NEPA scoping process and resulting investigation should be reexamined and reanalyzed in the *DEIS*.

For example, under Alternative 2.1B, the proposed 6-lane configuration of Alameda Street is reduced to 4-lanes ("reconstruction of Alameda Street generally in its current configuration," p. 2-41; "Alternative 2.1B would provide four traffic lanes along Alameda Street rather than the six lanes which would have been provided under Alternative 2.1A," p. 4-1). This revision appears inconsistent with the earlier declaration that "the alternatives providing only four traffic lanes were eliminated because the traffic analysis showed that these options would carry less traffic than the six-lane options" (p. S-8). Additionally, although the *FEIR* indicates that a bridge would be constructed over "Auto Center Drive" (p. 3-46, *FEIR*), the *DEIS* now concludes that a trainway overcrossing "of Auto Drive South (which would require a costly and geometrically undesirable overpass structure)" (p. 2-41) will not be implemented. The *DEIS* does not, however, indicate that either additional traffic analysis is required or that the previously rejected 4-lane alternatives will be reevaluated. (6)

As indicated in earlier comments, the *DEIS* under-estimates the number and frequency of rail traffic utilizing the Alameda Corridor right-of-way (e.g., "local trains" utilizing the "drill track"; use as part of an expanded fixed-rail transit system). As a result, reevaluation of potential noise and vibration impacts is deemed warranted. (6)

- The *DEIS* indicates that "the most recent 1990 Amendments [of the *State Implementation Plan*] address nonattainment" (p. 3-2). In actuality the most recent revisions of both *the State Implementation Plan* (SIP) and *Federal Implementation Plan* (FIP) are contained in the *1994 Air Quality Management Plan* (South Coast Air Quality Management District, 1994). As a result, the *DEIS* should be revised to reflect revisions presented in the 1994 *Air Quality Management Plan.* (7)

- Table 3-1 (Federal and State Air Quality Standards) (p. 3-3) reflects a 9.0 ppm [parts per million] 8-hour standard for the federal primary criterion for carbon monoxide (CO). In actuality this standard in 9 ppm; thereby allowing levels of CO to reach 9.4 ppm before exceeding the standard. This is why the California Air Resources Board air quality data reports define level ≥9.5 ppm as being in excess of federal standards. The table should be changed to reflect the correct standard. (8)

- The information presented in the *DEIS* (p. 3-5) relies heavily on the *1991 Air Quality Management Plan*, which has now (as acknowledged in the *DEIS*) been superseded by the *1994 Air Quality Management Plan.* Some of the attainment dates have been changed in the new plan and should, therefore, be reflected in both the text and in Table 3-2 (Expected Year for Attainment of the State and Federal Standards for the Four Criteria Pollutants) (p.3-6). Furthermore, the three-tier plan outlined in the *DEIS* has been replaced by a new two-tier plan. As a result, the *DEIS* should be revised to reflect the projections and goals outlined in the *1994 Air Quality Management Plan*, placing less emphasis on the *1991 Air Quality Management Plan.* (9)

- In accordance with the projections of the *1994 Air Quality Management Plan*, Table 3-2 (Expected Year for Attainment of the State and Federal Standards for the Four Criteria Pollutants) (p.3-6), taken directly from page 5-5 of the *1991 Air Quality Management Plan* (p. 5-5, *1991 Air Quality Management Plan*), is no longer applicable. A revised table should, therefore, be prepared. (10)

- In describing the "definition of conformity" (p. 3-7), in addition to CO and particulates (PM_{10}), a number of other pollutants must be addressed, including volatile organic compounds (VOCs) and nitrogen oxide (No_x), pursuant to 40 CFR Part 51 (Procedures for Conformity Determinations of General Federal Actions), dated November 30, 1993, as amended. (11)

- The *DEIS* (p. 3-16) contains an error in the National Register criteria for evaluation of cultural resources as taken from 36 CFR 60.4. Under "criteria considerations" the DEIS states that "such properties will qualify if they are integral parts of districts that do *not* meet the criteria..." (emphasis added). The text should read: "that *do* meet the criteria..." (emphasis added). (12)

- In addressing storm drainage capacity along the Los Angeles River and Compton Creek, the *DEIS* indicates that, based upon data provided by the USACOE, "the USACOE *believes there may be* a shortfall in capacity in the event of a 100-year storm" along the Los Angeles River (p. 3-30) and "there *may* be a shortfall of capacity in the event of a 100-year flood event" along Compton Creek (p. 3-31) (emphasis added). Since hydrology is not an inexact science, the combined resources of both the USACOE and the federal lead agencies should be able to either identify a capacity shortfall or conclude the adequacy of existing regional drainage facilities (i.e., "the area south of Rosecrans Avenue lies within a 100-year flood zone," p. 3-32). The *DEIS* should provide a factual analysis of both the existing environmental setting (i.e., "the LACDA [Los Angeles County Drainage Area] flood control system is seriously deficient in some areas of the main Los Angeles and Rio Hondo channels...problems were greatest downstream of downtown," p. 3-32) and the reasonably foreseeable future environment that will exist upon implementation of the project and those alternatives addressed in the EIS. The above reference is but one of many examples of how the document fails to accurately represent both pre- and post-project conditions.

  (13)

  Since "the Alameda Corridor would cross the Los Angeles River north of Washington Boulevard" (p. 3-30) and parallel that regional stormwater conduit along its entire length (see Figure 3-7, p. 3-29) and since "a railroad crossing of [Compton] creek at the interchange of SR-91 and Alameda Street would be involved" (p. 3-31), any overtopping condition would have the potential to significantly effect any segment of the Alameda Corridor within that designed flood zone, specifically any depressed segment of that right-of-way which might serve as both a catch-basin and conduit for storm flows. This is of particular concern since the water quality within those a storm drain facility "is quite poor because it serves as a outlet for runoff from its urbanized drainage area" (p. 3-31).

  Within the *DEIS*, an insufficient analysis of both the hydrologic and water quality issues associated with the proposed project are presently provided. For example, referencing correspondence received from Mr. David J. Farrel, Chief of the Environmental Review Section, Office of Federal Activities for the USEPA, dated June 3, 1994 and included in Appendix F (Agency Correspondence) of the *DEIS*, Mr. Farrel states that "the *DEIS* should document the project's consistency with applicable stormwater permitting requirements, including mitigation measures that may be necessary." The requested information has not been included in the *DEIS*; therefore, the document's discussion of this topical issue is, at best, incomplete.

- The Alameda Corridor alignment was selected, in part, over other alternative corridors (e.g., UPRR; Los Angeles River) because Alameda Street "has been an industrial corridor with substantial amounts of freight rail traffic for nearly all of its past life" (p. 2-7). This historic industrial use accounts for the number and magnitude of hazardous material sites identified along that right-of-way; however, the *DEIS* does not fully describe the methodologies utilized by the firms contracted (by the federal lead agencies) to investigate for hazardous material occurrences. For example, the *DEIS* does not disclose the number or nature of subsurface investigations actually performed within the existing and/or proposed trainway or document the presence and extent of soil and groundwater contamination that will be encountered during construction operations. Should contaminants exist within the proposed area of construction, those contaminants may adversely affect both site workers and water quality conditions should those pollutants be transported off-site via the local or regional storm drain system. Additionally, authorized remediation activities (e.g, on-site clean-up; off-site disposal) will be required concurrent with overall construction operations. Presently, the *DEIS* does not offer a sufficient discussion of these potential impacts and, therefore, no basis is provided to support a conclusion for non-significance. (14)

- Since the Alameda Corridor is projected to transport an estimated 210 million metric tons (mmt) of cargo by the year 2020 (up from 99 million in 1991), of which 77 mmt will be "liquid bulk" (p. 1-6), the potential exists for leakage and associated spillage of hazardous materials and petro-chemical products which, upon flooding, would be added to stormwater contaminants. Referencing the *DEIS*, "approximately ten percent of freight rail cars moving through the region carry materials classified as hazardous" (p. 3-45). By inference, a reviewer can derive a substantially higher accident potential. As indicated in the *DEIS*, two spills occurred in 1991 based upon data obtained "from the SP railroad along the Alameda Corridor" (p. 3-45). In 1990 a total of only 17 SP trains were recorded (p. 3-46); producing a spill-to-train ratio of approximately 12 percent.

  Assuming a "standard train length of 2,438 meters (8,000 feet)" (p. 2-20), 97 trains per day in the year 2020 (*Ibid*) and an average car length of 55 feet, an estimated 1,410 rail cars carrying hazardous materials will pass through the City daily. If each car has a 90 ton capacity, an estimated 125,000 tons of hazardous materials will be shipped through the City and potentially subjected to accidental release on a daily basis. (15)

  The *DEIS* again discounts potential project-induced impacts by stating that "since the corridor is presently used for the transport of hazardous materials by both freight rail and trucks, the risk of an accidental release of hazardous materials already exists within the corridor" (p. 3-46). No reference is provided indicating that the number of trains will increase over 246 percent (from 28 to 97 trains) over existing conditions by the year 2020.

- The *DEIS* further states that "operation of the project may affect public health through the (16)

accidental release of hazardous materials in transit along the corridor" (p. 3-36). In addition to any "accidental release" it is reasonable to assume that some materials will be discharged, released or deposited through normal operations and expanded use.

This environmental setting (p. 3-36 *et seq.*) completely omits discussion of the hazardous nature of the many miles of railroad ballast currently underlying the existing rails. This ballast is impregnated with oil and is considered a hazardous material. Additionally, the *DEIS* fails to recognize the existence of cresol (creosote), a regulated material used to coat wooden utility poles that would require removal during project implementation. Furthermore, the document fails to identify and describe recent studies documenting the presence of elevated levels of asbestos along railways. No mitigation measures are proposed in the *DEIS* in response to the presence or potential presence of these wastes. (16)

- Correspondence received from Mr. David J. Farrel, Chief of the Environmental Review Section of the USEPA, dated June 3, 1994, and included in Appendix F (Agency Correspondence) in the *DEIS* raises the following comment:

  The Alameda Corridor Final Environmental Impact Report (FEIR) states, 'A corridor Emergency Response Plan will be prepared in accordance with applicable guidelines and regulations...approved by all appropriate agencies." The inclusion of this emergency response language in the EIR is an important first step. However, we believe that a worst case Emergency Response Plan specific to the Alameda Corridor should..incorporate the following details, which should be clearly outlined in the DEIS: (1) The emergency response plan should be specifically designed for the Alameda Corridor area and should be adequate to respond to worst case scenarios, including timely, adequate responses to spill incidents affecting sensitive populations (schools, hospitals, childcare facilities, playgrounds, etc.) and natural resources. (2) We strongly recommend that the emergency response plan be sent for review and comment to USEPA, the Coast Guard, US Fish and Wildlife Service, California Office of Emergency Services, California EPA, Los Angeles County, municipal fire departments, Regional Water Quality Control Board, California Department of Fish and Game, and the Highway Patrol. (3) The emergency response plan...should be fully consistent with other existing contingency plans in the project area, including the federal area plan maintained by the U. S. Coast Guard...and plans maintained by local jurisdictions...Any discrepancies with existing emergency response plans should be briefly noted in the DEIS. (4) The plan should be fully consistent with existing federal and State requirements, including U. S. Department of Transportation Requirements. (5) The plan should be periodically updated...(6) We recommend that the text of the emergency response plan be included in the DEIS so that the public has an opportunity to provide input. (emphasis included in citation). (17)

  Notwithstanding this formal request from the USEPA, no "Alameda Corridor Emergency

Response Plan" has been formulated or included in the *DEIS* ("an emergency response plan will be developed and approved prior to operation of the proposed project," p. 4-29). Additionally, no discussion is provided concerning a worst case analysis or assessment of potential impacts upon "sensitive populations." The *DEIS* does, however, disclose that a number of residential and educational uses and community facilities are located so close to the proposed right-of-way as to experience significant adverse noise impacts ("a noise impact would be experienced at 92 residences and 2 community facilities, as a result of the project," p. S-35; and "the proposed project would result in increased noise effects at 2 schools located along the corridor," p. S-39). Based upon this proximity, these same uses may be subjected to potentially significant effects associated with a "spill incident" along that rail line. (17)

Based upon these comments, the *DEIS* should be supplemented to include both the USEPA's requested "Alameda Corridor Emergency Response Plan" and a detailed analysis of potential worst-case impacts resulting from the expanded use of that right-of-way, including both rail and truck-haul activities.

- As indicated in the above comment, the USEPA has formally requested that the FHWA and FRA forward a copy of the "Alameda Corridor Emergency Response Plan" to "the Coast Guard, U.S. Fish and Wildlife Service, California Office of Emergency Services, California EPA, Los Angeles County, municipal fire departments, Regional Water Quality Control Board, California Department of Fish and Game, and the Highway Patrol." Based upon the "list of parties receiving copies of the EIS" (Appendix D), the following agencies did not receive notice: (1) the Coast Guard; (2) California Office of Emergency Services; (3) California Environmental Protection Agency; (4) specifically to the individual fire department of local governmental agencies; and (5) California Highway Patrol. The federal lead agencies should indicate their rationale for not notifying these agencies, although requested to do so by the USEPA. (18)

- Although the USEPA requested that an emergency response plan be presented in the *DEIS* which is "fully consistent with other existing contingency plans in the project area, including the federal area plan maintained by the U.S. Coast Guard...and plans maintained by local jurisdictions" and describe "any discrepancies with existing emergency response plans," no such analysis is presently provided in the *DEIS*. As required under the *FRA NEPA Guidelines* and *CEQ Regulations*, the *DEIS* is, however, obligated "to discuss to what extent the alternatives are consistent with approved coastal zone management programs" (Section 14(n)(9), *FRA NEPA Guidelines*) and discuss potential conflicts with the objectives of other regional, State and local plans, policies and controls (Sections 1502.16(c) and 1506.2(d), *CEQ Regulations*). In recognition of this obligation, the *DEIS* should be expanded to both include a proposed emergency response plan and to compare that plan with other contingency plans that may be established by local, State and federal agencies. (19)

14.6 Chapter 4: Environmental Consequences

Subsection 4.1 - Introduction

- In comparing Alternative 2.1A and Alternative 2.1B, the *DEIS* indicates that "the primary physical differences between these two alternatives are: (a) Alternative 2.1B would provide four traffic lanes along Alameda Street rather than the six lanes which would have been provided under Alternative 2.1A, (b) Alternative 2.1B would provide left turn pockets at several additional intersections that were not included under Alternative 2.1A and (c) Alternative 2.1B would entail several minor design modifications in selected locations that differ from Alternative 2.1A" (p. 4-1). As indicated above, this document should stand upon its own independent merits and not merely attempt to add upon a previous work effort which was not intended to represent a NEPA-mandated document. It is, however, appropriate to describe the historic background of the project and describe any previous environmental studies and focused technical reports which may have been previously conducted during the Alameda Corridor's overall planning program. Should the *FEIR* be referenced as part thereof, a graphic should be included which illustrates the precise location and nature of any proposed changes between Alternative 2.1A and Alternative 2.1B. (1)

- As indicated in the *FEIR*, "many [of the study area] intersections have higher V/C [volume-to-capacity] ratios with the project alternatives [e.g., Alternative 2.1A] than with the No Build condition. This is mostly due to the larger attraction of vehicles to the Corridor by the improvements, as indicated by the high growth rate" (p. 5-165, *FEIR*). As indicated in Table 5-29 (PM Peak Analysis - Year 2010 Conditions), a number of key intersections in the City will experience significant level of service deficiencies (e.g., LOS "E") in year 2010 (ten year prior to the growth projections addressed in the *DEIS*) under a 6-lane alternative. Notwithstanding the reduction of the number of vehicle lanes from six (Alternative 2.1A) to four (Alternative 2.1B) and the increase in ambient traffic growth over the projected planning period, the *DEIS* concludes that travel conditions along this roadway will improve ("the locally preferred alternative would improve traffic flow along and across the corridor," p. 4-54); however, that conclusion cannot be independently validated. As more thoroughly described below, additional traffic analysis is deemed warranted to assess post-project (year 2020) conditions upon the local street system. (2)

Subsection 4.2 - Air Quality

- Section 4.2.1 (p. 4-2 *et seq.*) of the *DEIS* completely omits discussion of the effects of those air toxics which are expected to be released due to excavation of known contaminated soils (addressed in Section 4.5), as well as contaminants that will be discovered during any Phase II study to be conducted at the onset of the project, on both construction workers and the surrounding populous. Furthermore, since the project will release contaminated dust into the (1)

atmosphere, a significant quantity of PM_{10} would be released and would spread for miles beyond the confines of the project site. Although the *DEIS* (p. 4-15) states that contaminated soils encountered during construction would be remediated using approved techniques, many types of contaminants have no visible evidence or odor (e.g., asbestos typically associated with railroad easements and heavy metals) and are neither discernible to a construction crew nor on-site monitor. In recognition of the potential environmental health consequences of these pollutants, the *DEIS* should address potential health effects associated with PM_{10} and present both a detailed analysis of the projected quantity and direction (based upon prevailing wind patterns and dispersion assumptions) of discharge and address the range of mitigation measures (and effectiveness of each measure) in controlling the release of contaminated dust particles. (1)

- As indicated in the *DEIS*, "up to 40 full acquisitions and up to 16 partial acquisitions of commercial properties" (p. S-37) will be required. The *FEIR* further states that "buildings which need to be removed would either be dismantled, or in some isolated cases moved to a different location" (p. 3-59, *FEIR*). Based upon the age of many of these structures, these improvements may include asbestos-containing building materials (ACBM), such as insulation and tiles. In accordance with the methodology presented in the South Coast Air Quality Management District's (SCAQMD) *CEQA Air Quality Handbook*, this regulated waste must be addressed in the air impacts analysis of the project's environmental documentation. No such analysis is, however, presented herein. (2)

- Referencing Table 4-1 (Exhaust Emissions from Construction-Related Activities) in the *DEIS*, emissions estimates for construction activities were recalculated in accordance with the equipment listing presented in the *FEIR* to confirm the validity of the presented emissions. Recalculation of these emissions shows that the original calculations omitted both worker vehicles and haul trucks necessary to bring workers, construction materials to and excavated soils from the site. As indicated in the *DEIS*, the project is projected to generate "10,000 person-years of construction employment over a 10 year period" (p. 4-63); thus, based upon an annual average, an estimated 1,000 people will be employed during project construction. Based upon this project, estimated emissions should be recalculated to include employee commuting trips; haul trips should be calculated to present a worst-case scenario for materials movement (e.g., movement of asphalt and concrete; cut and fill material). Once calculated, these emissions (and the methodology utilized to derive these emissions) should be included as part of the project's environmental analysis. (3)

- The air quality analysis completely omitted VOC emissions produced by the application of asphalt, in accordance with methodology presented in *AP-42, A Compilation of Air Pollutant Emission Factors* (USEPA, 1985). As indicated therein, approximately 292 pounds of VOC emissions will be produced per cubic yard applied. VOC emissions will further be produced as a result of any fuel storage and dispensation directly or indirectly associated with the (4)

project, as well as from the use of any architectural coatings to be applied. The quantity and effects of these emissions should be addressed and mitigated in the *DEIS*. (4)

- Review of the *DEIS* (p. 4-3) revealed that the assumptions and data used in the ISC2 model were not included in the document; therefore, the City is unable to independently attest to the validity of the results presented therein. In accordance with Section 1502.24 of the *CEQ Regulations* and 46 FR 18026 *et seq.*, the *DEIS* shall present a discussion "of the methodology or models used in the analysis of impacts." In order to enable the City to review the methodologies utilized in the derivation of emission estimates, that material should be presented in an appendix to the *DEIS* so that the results of the model may be validated. (5)

- The discussion of operational emissions presented in Section 4.2.2 (Regional Emissions) (p. 4-3) in the *DEIS* should be denoted as such. As presently titled, the analysis implies a discussion of ambient air quality. (6)

- Review of both the *DEIS* (Table 4-3, p. 4-4) and *FEIR* reveals that although the total number of miles traveled by locomotives and vehicles is included in the *FEIR*, much of the other relevant data (e.g., the number of engines per train; number of vehicles; number of vehicle cold and hot starts; average trip length; etc.), as well as assumptions used in calculating the railroad and vehicle emissions, are not included in the document; therefore, the City cannot attest to the validity of the results presented in the *DEIS*. This information should be supplied in the *DEIS* or a technical appendix thereto so that the results of the analysis may be independently validated. (7)

- The *FEIR*, which serves as a basis for the *DEIS*, is counter-intuitive. Table 4-14 (Regional Traffic Study Area Mobile Source Mileage) (p. 4-51, *FEIR*) shows an increase in railroad operations from 816 miles per day (existing) to 1,953 miles per day in the year 2010 and a further increase to 2,602 miles per day in the year 2020 for the "no project" alternative; thereby inferring that railroad activities will increase by 239 and 321 percent, respectively, during that time period. This would infer that the number of train trips are correspondingly increased by these values; however, when comparing "existing" to the "no project" year 2020 emissions (as shown in Table 4-15 of the *FEIR* for railroad operations), emissions are estimated to increase by 21.8 times (for SO_x) and 98.3 times (for ROG) over existing emissions. Based upon the projected increase in railroad miles, the projected emission factors would be anticipated to increase by only a factor of about three times. This apparent inconsistency should be explained. (8)

  Table 4-16 (Vehicle Hours of Delay at Grade Crossings) (p. 4-52) of the *FEIR* indicates that vehicle delays will be increased from 1,906 hours in the year 1990 to 10,190 hours in the year 2010 and 15,940 hours per day in the year 2020 (representing a 535 and 836 percent

increase, respectively). This would then infer that, assuming that the waiting time for each train remains constant and the number of trains increases as per the above comment, the number of vehicles using the Alameda Corridor would increase by 220 percent over the current value in the year 2010 and 260 percent over the current value in the year 2020; however, the *FEIR* (Section 5.4.3, p. 5-160) states that the Alameda Corridor is expected to carry only 118 percent more traffic in the year 2020 than those volumes which existed in the year 1990. These apparent discrepancies should be explained. (8)

- Table 4-3 (Existing and Year 2020 Regional Emissions) in the *DEIS* (p. 4-4) under-estimates vehicle idle emissions. For example, the "vehicle idle emissions" for the "no project" alternative (Year 2020) identifies CO as 1,116 pounds per day. This estimate cannot be validated based upon the following assumptions: (1) 15,940 vehicle idle hours (Table 4-16, p. 4-52, *FEIR*); and (2) composite vehicles include 90.5 percent autos and 9.5 percent trucks (calculated from Table 4-14, p. 4-51, *DEIS*). These values were then used in the calculation of composite vehicle emissions in accordance with page A9-73, Table A9-5-P-1 (p. A9-73) of the SCAQMD's *CEQA Air Quality Handbook* which gives a composite vehicle idle emission of 1.538 grams per minute. Based upon these assumptions, the following vehicle idle emissions are calculated in accordance with the following formula: (15,940 hours x 60 min/hr x 1.538 gm/min) ÷ (454 gm/lb) = 3,240.0 lbs/day. (9)

  It should be noted that the resulting value (i.e., 3,240 pounds/day) is far greater than the 1,116 pounds/day predicted in Table 4-3 (p. 4-4) of the *DEIS* and casts aspersions on other idle emissions contained in the *DEIS*, especially those used in the CALINE4 modeling procedures. As a result, the City requests that all idle calculations be recalculated in accordance with the SCAQMD's *CEQA Air Quality Handbook* (Table A9-5-P-1, p. A9-73, *CEQA Air Quality Handbook*) .

- Review of the *DEIS* (p. 4-8) revealed that the assumptions and data (e.g., composite vehicle emissions both running and idling; idle time at intersections and waiting for trains; ambient temperature; surface roughness; etc.) used in the CALINE4 model were not included in the document. This non-inclusion appears inconsistent with Section 1502.24 of the *CEQ Regulations* and 46 FR 18026 *et seq.*

  If, as demonstrated above, idle emissions were calculated incorrectly, a far greater number of intersections would be anticipated to show violation of the ambient air quality standards. All CALINE4 analyses included in Tables 4-4 through 4-8 of the *DEIS* should be rerun using the composite vehicle emissions (i.e., running and idling) calculated using methodology presented in the SCAQMD's *CEQA Air Quality Handbook* (Table A9-5-P-1, p. A9-73, *CEQA Air Quality Handbook*) with the calculations presented either in the *DEIS* or in a separate appendix for validation. (10)

- Table 4-8 (Year 2020 Maximum 8-Hour Carbon Monoxide Concentrations) in the *DEIS* (p. 4-13) incorrectly shows a violation of the federal 8-hour CO standard for the "no project" alternative at the intersection of the Alameda Corridor and Alondra Boulevard. The value presented is 9.0 ppm. The federal standard is 9 ppm (not 9.0 ppm) and no violation is incurred until a concentration $\geq$9.5 ppm is reached. (11)

- The conformity analysis presented in the *DEIS* (Section 4.2.5, p. 4-14) is based upon the requirement outlined in 40 CFR Part 51 (November 24, 1993) and does not address the requirements of 40 CFR Part 51, as amended (Vol. 58, No. 228, November 30, 1993). In accordance with the November 30, 1993 revisions, the project must also consider O_3 and its precursors (i.e., VOCs and NO_2) which are completely ignored in the *DEIS* analysis. In accordance with those revisions, a project is not presumed to conform if any of the following cases apply: (1) cause or contribute to *any new violation of any standard* (emphasis added) in any area; (2) interfere with provisions in the applicable SIP for maintenance of any standard; (3) increase the frequency or severity of any existing violation of any standard in any area; or (4) delay timely attainment of any standard or any required interim emission reductions or other milestones. Construction emissions are not excluded from the conformity review.

  Although these standards would be different for a "major transportation project" (subject to Subpart T of 40 CFR Part 51, as amended), the *DEIS* (p. S-29) concludes that the "preferred project" is not considered a major metropolitan transportation project. (12)

  As indicated above, the conformity analysis specifies "any new violation of any standard" and does not limit the conformity review to only federal and State standards. Because construction emissions are projected to exceed SCAQMD threshold standards for NO_2 and would exceed threshold standards for ROG (VOCs) and potentially other criteria pollutants had vehicle movement and evaporative emissions been properly documented, and since the proposed mitigation measures will not reduce these emissions to a level of nonsignificant as defined in accordance with SCAQMD threshold standards, the project does not conform with the 40 CFR Part 51, as amended (Vol. 58, No. 228, November 30, 1993) revisions.

  Based upon this determination, the federal lead agencies should reanalyze the project as required under the appropriate sections of 40 CFR Part 51, as amended (Vol. 58, No. 228, November 30, 1993) and revise the conformity review in accordance therewith.

- Section 4.2.6.1 (p. 4-15) of the *DEIS* does not specify the fact that based on the presented emission levels for construction indicated in Table 4-1 (which does not include emissions produced by worker vehicles, haul trucks, paving and the application of coating), the provided mitigation measures will not reduce the construction emissions to a non-significant level. This point should be clarified in the document and additional mitigation (e.g., (13)

extension of the construction schedule) provided to further reduce construction emissions. (13)

- Because electrification of the railroad line is not proposed in the project, the discussion presented in Section 4.2.6.2 (p. 4-15) is inappropriate for the document. If, however, this discussion is to be retained, a comparable analysis should also be included for the "no build" alternative and short-term (i.e., construction) emissions associated with this electrification should be presented. (14)

- Many of the mitigation measures identified in Table 4-9 (Mitigation Measures for Construction Activities) of the *DEIS* (p. 4-16) are too vague to be enforceable (e.g., "traffic speeds on all unpaved road surfaces to be reduced to minimal levels"). Other available measures (e.g., keeping all equipment in a proper state of tune as per the manufacturer's specifications) should be included.

  Some of the stated mitigation measures address issue areas that were not included in the impact analysis (e.g., "schedule movements of construction materials during off-peak hours, if possible"). Should these measures be provided in response to identified or potential environmental effects, the *DEIS* should present a detailed analysis of those environmental effects so that the appropriateness and effectiveness of the identified measures can be ascertained.

  Additionally, to simply give a projected general reduction efficiency is unacceptable. The presented mitigation measures have different control efficiencies for different pollutant species. Each measure should, therefore, be categorized in accordance with the criteria pollutant that the measure seeks to reduce. Measure-specific efficiency levels should then be stated and the source for those efficiency projections documented. (15)

  Finally, the information presented in Table 4-9 (Mitigation Measures for Construction Activities) appears potentially misleading. One may tend to think that the presented reduction efficiencies are additive, which, of course, they are not. The residual impact from the application of these emission-reduction strategies should be presented so that an independent determination can be made concerning the post-mitigated effect (e.g., reduced to a level that is not significant). If implementation of the mitigation measures does not reduce the impact to a level that is less than significant, the residual impact will contribute to the severity of an existing violation of the ambient air quality standards. Although the *DEIS* does not address this point, this would require a determination that emission projections associated with anticipated construction activities would be deemed to be in non-conformance with the rules set forth in 40 CFR Part 51, as amended (Vol. 58, No. 228, November 30, 1993). In response to these stated concerns, the air quality analysis should be revised to ensure a complete accounting of air quality impacts.

- The mitigation measures presented in Table 4-10 (Construction Related Activity - PM_{10} Mitigation Measures) (p. 4-17) are repetitive of those presented in Table 4-9 (Mitigation Measures for Construction Activities) (p. 4-16) and do not introduce additional construction-related mitigation measures as stated in the *DEIS* (p. 4-15). (16)

Subsection 4.3 - Cultural Resources

- If an archaeological technical report was prepared for the project, that report should be referenced and included as a technical appendix to the *DEIS*. (1)

- The cultural resources element of the *DEIS* was carefully reviewed to assess its accuracy, consistency, correct application of existing cultural resource management (CRM) laws and regulations and overall adequacy. Given that the previous *FEIR* was referenced as an integral part of the *DEIS*, that document was also carefully reviewed. It was necessary to study the various alternatives in both documents to be certain that the *DEIS* did, in fact, accomplish the necessary supplementary work required therein (pp. S-1, S-28 and S-29, *DEIS*). Based upon that review, the following errors and problems were noted: (1) the cultural resource component of the *DEIS* is omitted from the summary table (p. S-1); (2) errors in the citation of National Register criteria from 36 CFR 60.4 and portions of 36 CFR 800.11 are included in the text; (3) the *DEIS* has failed to examine the route's potential for buried historic archaeological sites through a study of historic maps that predate railroad construction in 1869; (4) the *DEIS* fails to present an adequate monitoring program for the protection of potential buried prehistoric and historic archaeological resources along the Alameda Corridor; (5) left unresolved are National Register eligibility and effects issues regarding historic and architectural resources, especially as noted in State Historic Preservation Officer (SHPO) letter of October 27, 1994; (6) there is an apparent failure in the *DEIS* relating to required Coastal Commission permits; (7) in lieu of a detailed analysis, the *DEIS* presents a somewhat vague statements regarding secondary and cumulative effects on cultural resources; and (8) the *DEIS* contains a total absence of a discussion of existing conditions, impacts and mitigation measures regarding paleontological resources. (2)

- Under archaeological mitigation measures, the *DEIS* (Section 4.3.3.1, p. 4-24) improperly cites 36 CFR 800.11 (which deals with properties discovered during the implementation of an undertaking). As written, the text states that "under 36 CFR 800.11...the Agency Official shall afford the Council an opportunity to comment by: [I] preparing a Memorandum of Agreement according to provisions of 36 CFR 800.6; [ii] develop and implement actions that take into account the effects of the undertaking on the property to the extent feasible and the comments from the SHPO and Council; [iii] if the property is principally of archaeological value and subject to the requirements of the Archeological and Historic Preservation Act...comply with that Act and implementing regulation instead of these regulations" (roman numerals added for purposes of discussion). Under 36 CFR 800.11, the three items are not (3)

listed as a group, but as a series of choices i.e., 36 CFR 800.11(b)(2)(I) through (iii)). (3)

- Both the *FEIR* and *DEIS* recognized the potential for unrecorded, buried prehistoric and historic archaeological resources along the Alameda Corridor. While it is somewhat difficult to predict the most likely areas for buried prehistoric settlements, there appears to have been no effort to examine early historic maps of the project area to assess where archaeological remains of potentially significant historic resources may lie buried along the Alameda Corridor. If such an effort was made, it is not stated in the *DEIS*. (4)

- The *FEIR* and *DEIS* summarize the results of a records search at the UCLA Archaeological Information Center and a field reconnaissance survey (pp. S-56, 5-301, 5-302, 5-313, and 5-325, *FEIR*; pp. S-41, 3-17, 3-18, 4-20, 4-21, 4-23, and 4-24, *DEIS*). The results of this study found that only two known archaeological sites are located in or near the Area of Potential Effect (APE). These include: (1) LAn-389 located well outside the APE and which is thought to have been destroyed; and (2) LAn-385, located near the APE. No evidence of artifactual material was noted for the latter site during a field survey. Given that LAn-385 included burials and features, it was recommended that the area between 109th and 111th streets along the west side of the Alameda Corridor be monitored by a SOPA-qualified archaeologist during construction. Both the summary table and the project's *Record of Decision* should contain this requirement. (5)

- The proposed mitigation measure to protect potentially buried cultural resources states that a "SOPA-qualified archaeologist will be contacted promptly should such unanticipated cultural resources remains be encountered during development or construction related activities within the vicinity of the find" (p. 4-24, *DEIS*). Given that the corridor passes through a well-watered basin suitable for major prehistoric sites with burials (e.g., LAn-385) and given that Los Angeles has a history of habitation prior to the construction of the initial railroad in 1869 and given that the creation of a depressed railway is likely to result in the excavation of deposits deeper and wider than any disturbance associated with historic railroad construction, it is likely that significant cultural resources may be encountered during the construction of the Alameda Corridor. (6)

  A more adequate archaeological monitoring program is, therefore, required. Minimally, a team of SOPA-qualified archaeologists with expertise in prehistoric and historic archaeology should be available for periodic, if not daily, monitoring of construction activities to ensure that valuable cultural resources are not destroyed during construction. It is also recommended that historic maps be studied to assess potentially sensitive areas for buried historic resources.

- As indicated in the *DEIS* (p. 3-12), the State Historic Preservation Officer (SHPO) concurred with the FHWA's findings of National Register eligibility for the project, but solicits (from (7)

FHWA) more information. These requests are outlined in the SHPO letter of October 27, 1994 and contained in Appendix F (Agency Correspondence) of the *DEIS*. Of particular interest are: (1) the SHPO's request for additional information on eligibility under Criterion "C" for additional buildings of the David Starr Jordan High School; (2) the SHPO's note that Bridge 53-C-0012 is, in fact, potentially eligible for the National Register according to the Local Bridge Inventory (1987); and (3) the SHPO's request for a more detailed explanation of why Bridge 2.41.5 over the Los Angeles River north of Washington Blvd is not eligible for the National Register under Criterion "A" given "its association with the SP, L & SL" railroads. (7)

In the case of the Jordan High School, the SHPO recommends that the property be "re-evaluated as a possible district comprised of contributors that span an appropriate time period such as 1927-1937" and that "integrity and boundary issues should be addressed as part of this effort." In the case of Bridge 53-C-0012, the SHPO recommends that it be evaluated if necessary. In short, there are three outstanding eligibility (potential impact) issues that are still unresolved. Each of these issues should be addressed prior to the federal lead agencies taking any action upon the proposed project.

- In the assessment of effects on the historic and architectural resources for the project (pp. 4-21 through 4-23), the issue of potential "transfer, lease or sale" is mentioned under some resources (i.e., David Starr Jordan High School, Ritter Elementary School, and Redondo Junction Historic District) and is not raised under others (i.e., Rancho Dominguez Adobe, Pacific Electric Railway Watson Station). This apparent inconsistency should be resolved or the federal lead agencies differentiation between these sites provided. (8)

- The *DEIS* (pp. 3-12 and 4-21) states that a formal "effects determination" has been submitted by FHWA to the SHPO and that FHWA is still awaiting SHPO concurrence. If such concurrence is obtained, it should be included in the project's environmental review record prior to any formal action upon the proposed project. If it is not received and included therein, appropriate corrective measures should be taken and their results included in the supplemental *DEIS* or in the federal lead agencies' response to public and agency comments. (9)

- As indicated in Appendix F (Agency Correspondence) of the *DEIS*, the Coastal Commission indicates that permits will be required from both the City of Los Angeles and the Coastal Commission prior to project development. The text of the *DEIS*, however, contains no corresponding reference to that permit obligation. (10)

- The *DEIS*'s discussion (Section 4.8.13) on secondary and cumulative effects on cultural resources is somewhat vague. It notes that no secondary or cumulative effects are anticipated as a result of this project. It should more precisely state "that no adverse effects upon cultural resources are anticipated from this project, *barring the discovery of significant* (11)

buried cultural resources during construction."

(11)

- Paleontological resources are not discussed in either the *FEIR* or *DEIS*. This is based on a reading of both the cultural resources and geology sections of both documents. According to the *FEIR*, the Alameda Corridor will pass through sediments of Pleistocene and Holocene age (pp. 4-1 through 4-4, *FEIR*); however, the paleontological sensitivity of these sediments is not discussed and this section is referenced without further study in the *DEIS*.

(12)

Paleontological resources are nonrenewable resources. Their significance, potential project impacts and appropriate mitigation measures should, therefore, be addressed in the *DEIS*.

Subsection 4.4 - Hydrology and Water Quality

- Section 4.4.1 (p. 4-25) is a rare example of the federal lead agencies' declaration of the criteria which are recommended to evaluate the significance of project-related impacts. Each topical issue should include a similar declaration so that independent reviewers can understand the agencies' bases for the conclusions presented in the *DEIS*.

Relative to this topical issue, the stated criteria constitutes an insufficient representation of those threshold values since it fails to present a significance threshold for each of the identified environmental effects which are subsequently disclosed in the *DEIS*. For example, the *DEIS* describes specific conditions during which "workers within channel(s) would be at risk" (p. 4-25). Since NEPA focuses upon "actions significantly affecting the quality of the human environment (Section 102(C), NEPA), impacts to workers' safety clearly constitutes an issue area for which threshold criteria should be established.

(1)

- As indicated in the *DEIS*, construction activities have the potential to disturb existing soil contaminants and release those contaminants in the form of storm drain discharge into the Los Angles Harbor. The *DEIS*, however, only acknowledges this potential impact relative to bridge pier construction in the Dominguez Channel (p. 4-25). Although not specifically within a designated drainage course, any construction activity along the entire length of the Alameda Corridor would potentially introduce the same water quality impacts since all drainage within the basin discharges to the Los Angeles Harbor. The potential environmental effects of those actions (and consequences) should be evaluated in an expanded analysis of water quality impacts.

(2)

- Although "the nature and extent of this potential contamination is not currently known" (p. 4-25), the *DEIS* (in the absence of that information) concludes that "these effects are characterized as not substantial" (*Ibid*). As required under Section 1502.22 of the *CEQ Regulations*, the lead agency is obligated to develop and/or otherwise furnish incomplete or currently unavailable information "if the incomplete information [is] relevant to reasonably

(3)

foreseeable significant adverse impacts [or] is essential to a reasoned choice among alternatives and the overall cost of obtaining it are not exorbitant."

Since Alameda Street "has been an industrial corridor with substantial amounts of freight rail traffic for nearly all of its past life" (p. 2-7) and, based upon this historic land use, a significant number and magnitude of hazardous material sites have been identified along that right-of-way and disclosed in the *DEIS*, it is further reasonable to anticipate that a number of additional sites containing soil contaminants will be uncovered during construction activities. Areas presently covered with impervious surfaces (e.g., roadway paving) may only hide potentially hazardous conditions and preclude pre-construction investigations of those areas. Similarly, areas proximal to existing rail lines may have experienced an accumulation of hazardous material over time and now create conditions which necessitate removal and/or remediation. Although the federal lead agencies may have conducted an extensive areawide review of known hazardous material sites, there is clearly no indication that the known sites constitute the totality of all contaminated areas along the length of the proposed project. (3)

In the absence of a more definitive assessment of the water quality impacts attributable to existing soil contamination, the EIS is ill-prepared to present a definitive conclusion concerning the potential significance of this identified impact; therefore, the City requests that further investigations be undertaken an additional discussion of this topical issue be presented in the *DEIS*. Additionally, a formal monitoring program should be identified and proposed to ensure that all potential contaminants are identified and that no actions occur which may detrimentally affect the beneficial uses of the area's water resources.

- Correspondence received from Mr. David J. Farrel, Chief of the Environmental Review Section of the USEPA, dated June 3, 1994, and included in Appendix F (Agency Correspondence) in the *DEIS* raises the following comment:

  The FEIR lists the various approvals which may be required for the project...[but] contains no reference to water quality protection, except to note that permits may be needed from the County Flood Control District. The DEIS should recognize that, pursuant to the federal Clean Water Act (CWA), any project disturbing a land area greater than five acres requires stormwater discharge permits for both construction and operational phases. The DEIS should document the project's consistency with applicable stormwater permitting requirements, including mitigation measures that may be necessary...we strongly encourage your office to work with the Regional Water Quality Control Board to determine what water pollution controls are necessary to comply with California's nonpoint source management program. (4)

  Although the USEPA "strongly encourages" the federal lead agencies to include an additional analysis of water quality protection programs, measures and permit obligations

(including the identification of appropriate mitigation measures), no such discussion is presented in the *DEIS*. Additionally, no discussion is provided concerning potential consistency or inconsistency with local, State or federal regulations or water quality plans. In accordance with Sections 1502.16(c) and 1506.2(d) of the *CEQ Regulations,* the *DEIS* should be augmented to include a discussion of any potential conflicts with the objectives of other regional, State and local plans, policies and controls. (4)

- Correspondence received from Mr. David J. Farrel, Chief of the Environmental Review Section of the USEPA, dated June 3, 1994, and included in Appendix F (Agency Correspondence) in the *DEIS* further states that:

  The Council on Environmental Quality has encouraged all federal agencies to incorporate appropriate pollution prevention principals and mechanisms in their NEPA planning and decision making. This CEQ guidance to federal agencies was published in the January 29, 1993 Federal Register. We recommend that the DEIS contain a wide variety of pollution prevention measures which may include water and energy conservation features, solid waste recycling, and hazardous waste minimization. Appropriate commitments to implement such measures should be included in the DEIS. (5)

  Based upon this pre-circulation comment and the above cited guidance to federal agencies, the *DEIS* should be expanded to present a project-level discussion of planned, proposed or mandated pollution prevent measures which will affect both construction and operational aspects of the proposed project.

- No discussion is provided concerning potential constraints imposed by inclement weather upon the project's construction schedule or operational activities. For example, this section could address potential impacts upon construction and trenching activities during the period from October 16 through April 14 when runoff may prevent or limit activities within established flood control channels and may adversely effect depressed segments of the corridor upon which ponding of water may occur. Although the *DEIS* indicates that "all construction activities within the three channels would be scheduled outside of the winter flood season, defined as the period between October 15 and April 15"(p. 4-29), this "mitigation measure" is neither included in the summary table nor are the reasons for its non-inclusion stated. Should no prohibitions be proposed during these events, what alternative mitigation measures are recommended to minimize or avoid water-related impacts (including hindrance of drainage flows) within flood channels? Within railroad and roadway trench areas during construction in inclement weather? (6)

- The *DEIS* indicates that the greatest potential for surface water contamination attributable to an accidental discharge of hazardous or petroleum products will occur "where the corridor crosses the Los Angeles River...where the corridor crosses Compton Creek...and at the (7)

Dominguez Channel crossing. If large amounts of hazardous or toxic materials were to spill into any of these three surface water systems, possible contamination of the Los Angeles Harbor could occur. This is not regarded as a substantial adverse effect, however, because the likelihood of a major spill producing this situation would be low" (pp. 4-25 and 4-26). Based upon this comment, the federal lead agencies have established a threshold criteria for "significance" not as the resulting effect of that action (i.e., accidental spill) on the human environment, but rather as the probability of that occurrence.

Referencing 40 CFR 1508.3, the term "affecting" is "means will or *may* have an effect on" (emphasis added). No level of probability is stated or inferred therein. (7)

Notwithstanding this definition, the *DEIS* indicates that the federal lead agencies believe that the definition of "substantial adverse effect" is deemed to be tied to some undisclosed level of probability. The likelihood of occurrence is not, however, a supportable threshold criteria; whether the probability is one percent, ten percent or 100 percent, the resulting environmental consequence is the event that must be examined and not the number of times, days of the week or hours of the day in which the event occurs.

- Although "the U.S. Coast Guard does not classify the Dominguez Channel as a navigable waterway" (p. 4-26), the *DEIS* does not indicate whether that and other watercourses affected by the proposed project are "waters of the United States" and, therefore, subject to the jurisdiction of the: (1) United States Department of the Army Corps of Engineers under Section 404 of the federal Clean Water Act; (2) Regional Water Quality Control Board under Section 401 of the federal Clean Water Act; or (3) California Department of Fish and Game under Section 1601/3 of the California Fish and Game Code? (8)

- Prior to concluding that "the proposed project would not adversely affect beneficial floodplain values in the project study area" (p. 4-26), the *DEIS* should reference any applicable policies formulated by the Regional Water Quality Control Board (RWQCB) which define the "beneficial uses" of that water as established in the water management plans of that agency. (9)

- Although the *DEIS* discloses that a portion of the project exists within "the USACOE-delineated base floodplain" (p. 4-26), the document never indicates the potential ramifications of this alignment. Does this statement infer that the need for additional discretionary permits? Flood insurance requirements? (10)

  Since the *DEIS* previously disclosed that "in the event of a storm during construction within the flood control channel(s), workers within the channel(s) would be at risk" (p. 4-25) have additional mitigation measures been proposed to reduce risks to workers' safety? What policies of the California Occupational Safety and Health Administration (CAL OSHA)

regulate these high risk activities?

Additionally, since the *DEIS* acknowledges that workers "would be at risk," unless the recommended mitigation measures are strictly enforced (e.g., "all construction activities within the three channels would be scheduled outside of the winter flood season, defined as the period between October 15 and April 15," p. 4-29), the document's conclusion that all hydrology and water quality impacts could be reduced to levels deemed to be "not substantial" (p. S-33) is dependant upon the agencies' adoption and subsequent enforcement of those mitigation measures. Neither this declared impact nor this recommended mitigation strategy is, however, identified in Table S-1 (Alameda Corridor Summary of Impacts) (p. S-33). (10)

- The *DEIS* indicates that final facility design will be "consistent with the objectives of the Los Angeles County Drainage Study" (p. 4-27). No other reference to the "Drainage Study" is, however, provided in the text and no corresponding document is listed in Appendix A (Bibliography) in the *DEIS* or in Appendix II of the *FEIR*. What "Drainage Study" is being referenced? What "objectives" are presented therein? In the absence of that information, how is it possible to independently ascertain the declarations presented in the *DEIS*? (11)

- The *DEIS* indicates that since "approximately 8.05 kilometers [5 miles]" of the Alameda Corridor right-of-way exists within a USACOE-defined base flood" area, it will be necessary "to divert railroad traffic to existing rail lines during the course of the 100-year flood event" (p. 4-27). By this acknowledgment, the federal lead agencies introduce a scenario in which all freight service traveling along the Alameda Corridor will be diverted to other existing rail lines connecting the San Pedro Bay Ports with the downtown Los Angeles link to the national rail network. Although these "existing rail lines" are not identified in the *DEIS*, it is reasonable to conclude that this secondary route both currently exists and includes all or a portion of that UPRR alternative previously eliminated from further consideration due, in part, because that route was determined to "have substantial residential exposure" (p. 2-8)

  (12)

  Since the need for a secondary access route is identified and the conditions predicating its need identified and acknowledged, the *DEIS* is required to both disclose the precise location of that alternative access route and assess the resulting environmental impacts "upon the human environment" resulting or potentially resulting therefrom. No discussion of those issues are, however, presented in the *DEIS*.

  Additionally, based upon this declaration that certain environmental conditions will necessitate a rerouting of all train traffic, other conditions (e.g., risk of upset) can be identified which may also require a temporary redirection of all freight activities. It can be further assumed that the alternative travel route resulting from either environmental conditions or other factors would be the same for both scenarios. As a result, the document

should identify that alternative route and fully examine any environmental consequences associated with that use. Are mitigation measures appropriate to minimize or eliminate any environmental effects that may occur during that use? (12)

- The *DEIS* states that "the depressed trainway could be considered as an adjunct to the existing flood control system" (pp. 4-27 and 4-28). No additional elaboration upon this statement is, however, provided. Since "adjunct" is defined as "something joined or added to another thing," the *DEIS* infers that portions of the Alameda Corridor right-of-way will serve an ancillary function in support of regional storm drain plans and policies (e.g., safely conveying stormwater). No discussion of this potentially beneficial function is provided in the *DEIS*, no supportive engineering analysis is presented, no correspondence is included from the Los Angeles County Department of Public Works addressing this hydrologic issue and none of the project's declared objectives address this secondary function. As a result, the *DEIS* should state how this project will serve "as an adjunct to the existing flood control system."

  Additionally, since the *DEIS* declares that the greatest potential for surface water contamination attributable to an accidental discharge of hazardous or petroleum products will occur "where the corridor crosses the Los Angeles River...Compton Creek...and at the Dominguez Channel" (p. 4-25), should the corridor itself serve as a regional storm drain conduit, the proposed right-of-way may serve to transport "large amounts of hazardous or toxic materials" (p. 4-26) toward the San Pedro Bays. Although the *DEIS* states that "water entering the trainway in the event of a flood could become contaminated and require treatment" (p. 4-28), this potential impact is not regarded as a substantial impact "since collection and treatment facilities, including oil-water separators, will be provided as part of the project" (*Ibid*). The *DEIS* does not, however, acknowledge that stormwaters discharged through regional storm drain conduits are not subjected to "collection and treatment;" only ponded water may be effectively treated. (13)

  In this declaration, are the federal lead agencies stating that ponded water will be monitored and, as appropriate, collected and treated to remove contaminants? Since no monitoring activities are described, it can be assumed that ponded water will be allowed to evaporate and/or percolate into regional groundwater resources ("in the event of an emergency, such as a spill of material in transport, some of these materials could permeate the surrounding soil and contaminate the groundwater," p. 4-28), potentially effecting the water quality of those aquifers. Additionally, the statement that "collection and treatment facilities, including oil-water separators, will be provided as part of the project" neither insures the availability of that equipment or its effective utilization. As a result, it is not possible to support the assumption that these potential effects can be minimized below a level of significance.

- In defining potentially significant environmental impacts, the *DEIS* states that "a substantial (14)

discharge into surface waters would create pollution, contamination or nuisance" or "a substantial change in the quantity and/or quality of groundwater" (p. 4-25). The *DEIS* further acknowledges that "in the event of an emergency, such as a spill of material in transport, some of these materials could permeate the surrounding soil and contaminate the groundwater" (p. 4-28). Based upon this declared threshold criteria and the *DEIS*'s own admission, it is unclear how the federal lead agencies subsequently conclude that probable groundwater contamination "is not regarded as a substantial adverse effect." The purpose of establishing criteria against which to evaluate project-related and cumulative effects is to utilize that criteria in the determination of significance. (14)

Subsection 4.5 - Hazardous Materials

- The *DEIS* indicates that "extensive coordination with local fire and police agencies serving the Alameda Corridor was conducted during preparation of the EIR...Both the concerns that were raised and the proposed mitigation measures can be found in the EIR" (p. 4-31). The federal lead agencies' non-actions to resolicit testimony from local service providers is indicative of one of the primary deficiencies with the project's NEPA record. Although the preferred project (Alternative 2.1B) differs from the preferred project addressed in the *FEIR* (Alternative 2.1A), no concerted attempt has been made by the federal lead agencies to conduct personal meetings with those departments who will be ultimately responsible for the security and maintenance of the right-of-way.

Additionally, since the delineation of issues, analysis and "proposed mitigation measures" are contained in the *FEIR* (and not the *DEIS*), a reader is prevented from both understanding the magnitude of any departmental concerns and assessing the effectiveness of the recommended mitigation to address those issues. By failing to include that information within the *DEIS*, both the public and the project's decision-makers have or may have restricted access to that information; therefore, any actions taken upon the project may not occur in light of that informed decision-making which would occur should access to that material be readily available. (1)

Since the "proposed mitigation measures" are not included in the *DEIS*, the City is concerned that the measures delineated therein may not be fully considered and adopted in any resulting *Record of Decision*. The City, therefore, requests that the *DEIS* be amended to incorporate (within the body of the *DEIS*) all mitigation measures included in the *FEIR*, as well as all additional mitigation measures developed through the NEPA process.

Since the "findings" and "statement of overriding considerations" (as required under Sections 15091 and 15093 of the California Code of Regulations) were not included in the *DEIS*, it is not possible to verify whether each and every mitigation measure contained in the *FEIR* was adopted by the Alameda Corridor Transportation Authority, in that agency's role as

"lead agency" under CEQA. The *DEIS* should, therefore, contain a declaration stating whether revisions, deletions or other modifications to those recommended mitigation measures occurred as part of the administrative record under CEQA. (1)

- The *DEIS* (p. 4-31) only addresses construction of the depressed railway and totally omits reconstruction of Alameda Street. Various studies, including that performed for the City of Los Angeles by JayKim Engineers for the *Port Access Demonstration Projects* (circa 1987) in proximity to Phase III construction, have documented surficial and subterranean soil and groundwater contamination along the Alameda Corridor. These same studies have demonstrated that groundwater in the San Pedro Bay Ports area (i.e., in the vicinity of Anaheim Street) lie within 10 feet of the surface; therefore, it would be reasonable to believe that this groundwater, in addition to being contaminated with both petroleum hydrocarbons, is also contaminated with heavy metals and additional contaminants (e.g., ethylene glycol and solvents released from automotive wrecking yards and other industrial uses located along the length of Alameda Street). Because the renovation of a major portion of Alameda Street is part of the "preferred project,"these concerns must be addressed as part of the project's environmental review record. (2)

- The *DEIS* indicates that "federal and State regulations require that any contaminated soil or groundwater be cleaned prior to or during construction of the project" (p. 4-31). Based upon this acknowledgment, the *DEIS* must determine if this is really feasible. As stated in the *FEIR* (p. 4-23), "responsibility for clean up (including Phase I assessments) and monitoring of individual sites has not been established." Table 4-3 (p. 4-13, *FEIR*) therein shows 1,326 *known* hazardous waste sites within 4,000 feet and 142 *known* hazardous waste sites within 400 feet. Of these sites, 86 are CERCLIS sites within 4,000 feet and one CERCLIS sites is located within 400 feet. The remediation of CERCLIS sites is funded from the Superfund which is distributed by the federal government. The list of Superfund sites numbers into the thousands with more sites placed on the list on a regular basis. Furthermore, the expenditure to remediate these Superfund sites far outweighs the available funds and sites that are currently on the list will receive first priority for the funds that are either presently available or made available in the future. (3)

  Many areas along the route are contaminated from multiple sources. To determine responsibility for clean-up may involve extensive litigation and delays in implementation. It can be further assumed that many of the smaller responsible parties may not be able to bear the economic costs of clean-up and may, therefore, go bankrupt when the cost of remediation outweighs company assets. In light of these events, who will be economically responsible for the remediation of these contaminated sites?

- Throughout the *DEIS*, the federal lead agencies offer unsupported assumptions in lieu of reasoned technical analysis. For example, the *DEIS* states that "it may reasonably be (4)

concluded that the expected frequency of accidents involving the release of hazardous materials would be low; and the potential of public exposure in the event of a hazardous materials release within the corridor would be reduced due to the containment offered by the depressed trainway" (p. 4-32). The *DEIS* should, however, note that freight will also be transported along the Alameda Corridor via truck-haul operations and most segments of the corridor are not depressed. Additionally, the federal lead agencies substitute probability ("would be low") for significance, notwithstanding the *DEIS*'s conclusion that "the potential harmful effects of any *one accident* could be serious" (emphasis added). How does "serious" differ from "significant"? How does "significant" differ from "substantial"?

In recognition that public safety is a key role of government, the federal lead agencies have an obligation to do more than present unsubstantiated conclusions which, themselves, are contradicted by information presented elsewhere in the *DEIS*. Referencing the *DEIS*, "approximately ten percent of freight rail cars moving through the region carry materials classified as hazardous" (p. 3-45). As indicated in the *DEIS*, two spills occurred in 1991 based upon data obtained "from the SP railroad along the Alameda Corridor" (p. 3-45).

Referencing the *Ports EIR/EIS*, "Caltrans and six other traffic studies, estimated that the accident rate for trucks was between 8.8×10^{-6} and 5.4×10^{-7} per mile of transport...Pacific Northwest Laboratory estimates that 8.1 percent of truck accidents involving the transport of LPG result in a release of LPG...The County of Santa Barbara, based on an analysis of 1982 Federal Railroad Administration data, has estimated that if a car with hazardous materials is involved in an accident, the overall probability of a spill is 3.9 percent. Since a rail car carries more than a tank truck and since an accident can involve several rail cars, a train accident could result in a larger hazard footprint than a truck accident" (p. 4I-10). (4)

The *FEIR* states that "derailments account for 73 percent of all accidents involving hazardous materials...the vast majority were caused by three chemical groups: flammable gases, flammable liquids, and corrosives...seven percent of derailed tank cars from main line derailment/collision accidents released their contents" (p. 5-252, *FEIR*).

Based upon both these statistics and the operational assumptions for the Alameda Corridor (e.g., projected annual rail miles; number of trains; number of freight cars) , the federal lead agencies should be able to quantify the estimated number of accidents (truck and rail-haul) that can be reasonably anticipated, document the percent of haul-trips involving hazardous, toxic, flammable and explosive material, and determine the number and frequency of accidents which will result in the release of these substances. Based upon information provided by the Los Angeles Harbor Department and other sources, the types and quantities of materials could be estimated and a reasonable "risk of upset" analysis conducted, identifying and examining any risk of upset conditions associated with the construction and subsequent operation of the proposed project.

Based on historical data and on the proposed design and operation, the federal lead agencies should postulate both the worst-case type accidents and the most likely type accidents that could potentially occur. Potential accidents to be examined should include releases, fires and explosions. Potential consequences from the accidents that will be examined include radiant heat from a fire, flammable and toxic vapor cloud from a release, and blast overpressure and flying debris from an explosion or bleve. A number of industry-accepted models (e.g., ARCHIE, Chems-Plus, WHAZAN, or HFCP) presently exist and can be utilized to assist in calculating the extent of the potential hazards from accidents. The HFCP model is presently utilized by the Ports of Los Angeles and Long Beach in all of their projects involving risk analysis.

Potential consequences should be displayed as hazard footprints. Hazard footprints are typically calculated based on the type of material involved and on the likely and worst- case environmental conditions present. The downwind extent of vapor cloud hazard footprints is especially sensitive to wind speed and stability conditions. (4)

Once potential hazard footprints are calculated, a determination of significance should be undertaken. An accident would be classified as presenting a significant public safety impact if there is a reasonable possibility that the accident could cause injury or death to members of the public. Various agencies define reasonable possibility in different ways and thus the *DEIS* should formally establish the criteria which are to be utilized. If significant impacts are identified, appropriate mitigation measures (e.g., establishing a maximum allowable hazard footprint; prohibiting all etiological materials) should be recommended and a mitigation reporting and monitoring plan included as part of the environmental analysis.

- Although the *DEIS* indicates that "an emergency response plan will be developed to respond to emergencies" (p. 4-32), neither this action (if formulated as a mitigation measure) nor the entire topical issue (i.e., hazardous materials) is acknowledged in the Table S-1 (Alameda Corridor Summary of Impacts) (p. S-32 *et seq.*). Based upon the wholesale absence of this topic therefrom, none of the recommended mitigation measures discussed in Section 4.5.2 (pp. 4-33 and 4-34) are brought forward (to the summary table) for subsequent consideration by the project's decision-makers. The reason for this non-inclusion should be stated in a recirculated or supplemental *DEIS*. (5)

- None of these remediation measures identified in the *DEIS* (pp. 4-33 and 4-34) address the clean-up of contaminated groundwater. Secondly, no mention is made of the economics involved in the removal and various remediation methods and disposal of residuals. Furthermore, these measures give no indication as to the area necessary for their implementation. As an example, land farming of contaminated soil is performed at a thickness of about 6 to 12 inches; therefore, every cubic yard of material processed could take from 27 to 54 square feet of space for on-site or off-site remediation. Time is also a (6)

factor to be considered. Many of the discussed methods take months to treat small quantities of soil to acceptable levels. Based upon these considerations, the *DEIS* should address the feasibility of the stated measures and indicate where, when and how remediation activities will occur. (6)

Subsection 4.6 - Vegetation and Wildlife

- The *DEIS* indicates that "construction of a box culvert within this disturbed wetland [Compton Creek] could be considered a substantial impact" (p. 4-35). In contrast, Table S-1 (Alameda Corridor Summary of Impacts) (p. S-36) neither acknowledges this project-induced impact nor identifies the presence of a "substantial" impact upon vegetation and/or wildlife. Assuming that the federal lead agencies are not attempting to subvert the NEPA process, the reader is left to conclude that either the proposed "box culvert" will be replaced by an alternative project design or that the recommended mitigation measures will minimize the declared impact to a level deemed to be less than significant. Should an alternative design be proposed, the *DEIS* should clearly indicate the federal lead agencies commitment to an alternative solution. Alternatively, should the proposed mitigation measures avoid or reduce this impact, those measures must be clearly stated and the federal lead agencies must declare their intent to adopt and enforce those actions.

Subsection 4.7 - Other Impact Areas

- The City disagrees with the federal lead agencies assertion that "the environmental impacts associated with the locally preferred alternative (Alternative 2.1B) are similar to and/or less than those that have been described for Alternative 2.1A in the EIR" (p. 4-36). Although following similar alignments, the two options are substantially different both in terms of design (e.g., 4-lanes verses 6-lanes) and resulting environmental effect (e.g., traffic and circulation). As a result, it is not merely sufficient to "summarize the discussion of impacts provided in the EIR as they apply to the locally preferred alternative for the following impact areas: topography, geology and soils; noise; ground-borne vibration; energy; land use; population and housing; acquisition and displacement; transportation and circulation; public services; safety and security; aesthetics; and economics" (p. 4-36). Furthermore, it is inappropriate to pass that summary off as either an adequate analysis of the new NEPA preferred project (Alternative 2.1B) or a full and faithful attempt to comply with NEPA's environmental disclosure obligations. (1)

  The statement that the above referenced topical issues "are the impact areas that do not require further documentation/analysis, beyond that provided in the EIR, to meet NEPA requirements" (p. 4-36) presupposes that no subsequent events have occurred since certification of the *FEIR* which would necessitate further analysis therein; that the *FEIR* adequately suffices as a NEPA document; that the *FEIR* adequately addressed all direct,

indirect and cumulative environmental impacts, as well as all reasonable alternatives; that the two projects (Alternatives 2.1A and 2.1B) are not just similar but identical; that no additional scoping activities have introduced new issues or required re-examination of those issues previously addressed; and that NEPA authorizes over-reliance upon a State environmental process (not previously referred as a NEPA process). As more thoroughly described in these comments, none of the above conditions apply to this project, as revised.

- Insufficient information is presented in the text of the *DEIS* to allow affected agencies to formulate comments upon the material presented. Since the *DEIS* fails to present a reasonable analysis of this topical issue, including the direct, indirect and cumulative environmental effects of both the preferred project and a range of reasonable alternatives to that project, affected agencies, concerned citizens and the project's decision-makers are prevented (based upon that inadequacy) from making informed decisions about the project and its environmental implications. (2)

4.7.2 Topography, Geology and Soils

- The *DEIS* acknowledges that "ground shaking could result in the failure of structures along the proposed corridor and could disrupt service along the corridor...soil liquefaction could cause overlying structures to fail through the loss of load bearing capacity, lateral spreading and settlement. The failure of structures along the corridor could result in a disruption of service along the corridor" (p. 4-36). In recognition of the potential disruption to rail service along the Alameda Corridor resulting from geologic events within this seismically active region, the *DEIS* should elaborate upon proposed or recommended controls which will or can be implemented to minimize accident potential along this corridor. Although "disruption" can be addressed through the rerouting of freight traffic, the greater concern to the City is the potential risk of upset that may result from those events. This issue has not been adequately addressed in either the *FEIR* or *DEIS* (e.g., no mitigation measures are recommended in the *DEIS* to address "failure of structures" attributable to ground shaking).

4.7.3 Noise

- The FHWA criteria cited (Section 4.7.3.1, p. 4-38) for noise also sets a design standard of 52 dbA L_{EQ} for schools. This criterion should be discussed in the text of the *DEIS*. (1)

- The *DEIS* states that "Alternative 1.0 would require the taking of property from several schools along the Corridor in order to accommodate the above ground grade separations, whereas this would not be required under the depressed alternatives" (p. S-10). The *FEIR*, however, identifies Holmes Avenue Elementary School (p. 5-11, *FEIR*), Jorden High School and Ritter School (p. 5-12, *FEIR*) as being located in proximity to the Alameda Corridor and, thereby, potentially affected by the proposed project. These schools are neither identified (2)

in the *DEIS* nor formally addressed as part of the impact analysis. Based upon the non-consideration of project-related impacts upon these facilities, the *DEIS*'s noise analysis should be supplemented to address the projected construction-term and operational noise levels at these, as well as any other proximate school locations. (2)

- The terms "severe" and "substantial" (p. 4-38) do not constitute terminology typically applied to acoustical analysis and should, therefore, be substituted with "significant." Additionally, specific criteria for "significance" should be formulated and presented in the *DEIS*, in accordance with both applicable State guidelines, the *Noise Element* of the *County of Los Angeles General Plan* and other applicable local plans and policies (e.g., *City of Compton General Plan*) for those communities situated along the Alameda Corridor right-of-way (see Table 4H-6, p. 4H-9, *Ports EIR/EIS*). Furthermore, there is no basis existing in any of the above referenced plans and policies to support the use of a 72 dbA CNEL criteria for impact assessment. This level is substantially above both the established FHWA level of 67 dbA L_{EQ} and the generally accepted CNEL level of 65 dbA. The City, therefore, requests a re-examination of noise impacts, significance determination and mitigation measures based upon this reduced noise criteria. (3)

- As indicated in the *DEIS*, "if projected train noise exceeds 67 dbA and the total CNEL exceeds 72 dbA, there would be a severe impact" (p. 4-39). Based on the logarithmic addition of sound, this would allow for a 70 dbA CNEL for traffic noise. Because the CNEL is typically one to two dbA louder than the peak rush-hour noise, this would allow a peak rush-hour value of 68 to 69 dbA and would clearly violate the FHWA L_{EQ} standard of 67 dbA. (4)

- Although the *DEIS* states that by the year 2020 there would be an increase of 39 trains per day (p. 4-39), that document further concludes that "by the year 2020, an estimated 97 trains per day will be moving into and out of the ports" (p. S-4), representing a 65 train per day increase over the "32 trains per day operating to and from the ports" (*Ibid*). Are the 97 daily trains (p. S-4) the total number of trains accessing the San Pedro Bay Ports or can this number of trains potentially access the Alameda Corridor? If this number of trains will potentially utilize the Alameda Corridor on a daily basis, both the noise study and each of the other related topical issues should be re-examined to include an analysis of the potential direct, indirect and cumulative effects attributable to the additional 26 trains per day. In either event, the text of the *DEIS* should be amended to clarify the precise worst-case assumption regarding the number of trains which may use the Corridor. (5)

- The *DEIS* (p. 4-39) presents no data concerning the traffic mix (i.e., number of automobiles, medium and heavy trucks) estimated to utilize the Alameda Corridor. Additionally, the *DEIS* fails to represent the average travel speed and period volumes (e.g., AM and PM peak hours; off-peak hours). Furthermore, the traffic report does not present traffic volumes along (6)

Alameda Corridor links; therefore, insufficient information is provided to allow an independent observer to attest to the validity of the results presented in the *DEIS*. In order to facilitate independent review, the *DEIS* should disclose all assumptions utilized so that the results of the analysis may be validated. (6)

- Based on the traffic study provided in the *Ports EIR/EIS*, traffic along the Alameda Corridor in proximity to the I-405 Freeway (and the receptor listed on Salmon Avenue in the *FEIR*) is expected to be 35,000 to 50,000 average daily trips (ADT). In accordance with information presented in the *FEIR* (p. 5-160, *FEIR*), 34.5 percent of the port trucks are bound for the ICTF. The *FEIR* further states that about 45,290 trucks will use the San Pedro Bay Ports in the year 2020; therefore, in the year 2020, 15,625 trucks can be anticipated to utilize the Alameda Corridor on a daily basis. Based on a total year 2020 volume of 35,000 ADT, this would comprise 44.6 percent of the total daily traffic volume. Since the peak hour typically encompasses about 10 percent of the ADT, an estimated 3,500 ADT will utilize that roadway during either the AM or PM peak hour. Assuming an average speed of 40 miles per hour (mph) and a traffic mix of 56 percent automobiles, 4 percent medium trucks and 40 percent heavy trucks, the L_{EQ} at 50 feet from the centerline of the Alameda Corridor is estimated to be 82 dbA (using the FHWA Highway Noise Prediction Model). The 67 dbA L_{EQ} (FHWA criterion level) falls at a distance of 1,581 feet *exclusive of the additional noise produced by railroad operations*. In recognition that several sensitive receptors are located more proximate to the Alameda Corridor than this distance, the City feels that the noise study under-estimates both the volume of traffic to be utilized for the noise analysis and the resulting traffic-generated noise impacts. Based upon these findings, a greater number of sensitive receptors will be impacted than is indicated in the *DEIS*. (7)

- Although the *DEIS* (p. 4-40) identifies several residences where noise levels will be exceeded and those receptors adversely affected, no mitigation is presently proposed because "noise barriers may not be cost effective" (p. 4-40). Rather that taking no action to attenuate interior noise levels, the *DEIS* should explore alternative mitigation strategies (e.g., structural improvements to those affected properties) which may not reduce exterior noise levels but which would reduce noise in habitable spaces.

  Additionally, since the EIS is primarily an informational document, the decision whether a particular mitigation measure is "cost effective" should not be a determination of the EIS; rather, the decision to balance environmental and economic considerations is a policy decision that must be made by the project's decision-makers. As a result, the elimination of mitigation measures (e.g., "installation of a ballast mat installation...is not expected to be a cost effective approach," p. 4-47) based upon a non-disclosed "cost effectiveness" analysis appears premature. What criteria has the federal lead agencies utilized to evaluate whether a particular action is "cost effective"? (8)

- Although the *DEIS* does not specifically state that noise impacts upon the Exceptional Adult Education Center and Church of God of Prophecy will manifest from project implementation, the *FEIR* indicates that impacts upon these facilities will be "severe" (p. 4-106, *FEIR*); no mitigation is, however, provided or proposed for these institutions. Although the decision to implement a particular mitigation strategy rests with the project's decision makers, the *DEIS* should formulate a mitigation strategy which effectively attenuates on-site noise levels. As a result, the *DEIS* should be augmented to include a range of mitigation measures to be implemented for these receptors. (9)

- The *DEIS* (p. 4-44) relies on the discussion included in the *FEIR* (and not presented in the *DEIS*) to document the noise produced from construction activities. Although the first mitigation measure presented in the *DEIS* (p. 4-45) infers the use of pile drivers, neither the *FEIR* (p. 4-95, *FEIR*) nor *DEIS* address the noise generated by the use of this type of construction equipment. In accordance with the publication entitled *Noise from Construction Equipment and Operations, Building Equipment, and Home Appliances* (Bolt, Beranek, and Newman, USEPA, December 1971), the average noise from pile driving is documented at 101 dbA L_{EQ} at 50 feet (with peaks considerably above the 101 dbA L_{EQ} level), making it especially intrusive to proximal receptors. Because structures may be located as close as 100 feet (p. 4-45) from construction operations, receptors would be exposed to an impulsive noise level of approximately 95 dbA L_{EQ}. These potential impacts should be disclosed in the *DEIS* so that readers and decision-makers are made aware of the potential for significant construction-term impacts. (10)

- As a recommended mitigation measure for construction impacts, the *DEIS* recommends that the federal lead agencies (and construction contractor) "perform construction in a manner to maintain noise levels below specific limits in the vicinity of noise sensitive land uses" (p. 4-45). As presently structured, this mitigation measure is overly vague, indirect and unenforceable. Each of the recommended measures presented in the *DEIS* should be structured in a fashion which clearly acknowledges to whom or for what the measure is proposed, how compliance will be verified, when monitoring will be performed and what actions will occur in the event of non-compliance. (11)

- As a recommended mitigation measure for construction impacts, the *DEIS* recommends that the federal lead agencies shall "minimize construction activities during evening, nighttime, weekend and holiday periods" (p. 4-45). As with the previous comment, this measure (as presently structured) is too vague to be enforceable. A time-oriented mitigation measure should call out specific periods when construction activities are not to occur. (12)

- The *DEIS* offers no discussion on the residual (or post-mitigated) significance of the identified noise impacts following application of the recommended measures. No substantial evidence exists to refute that when construction is performed in proximity to sensitive (13)

receptors (e.g., dwellings units; school sites), the project-related and cumulative impacts upon those receptors will continue to remain significant. (13)

4.7.4 Ground-borne Vibration

- As a recommended mitigation measure for ground-borne vibration impacts, the *DEIS* recommends that "monitoring during vibration intensive activities will be conducted and corrective actions will be imposed if vibration exceeds established criteria" (p. 4-47). No criteria against which to assess project significance are, however, established in this document and no threshold is established to determine when "vibration exceeds established criteria." As indicated in the *FEIR*, vibration criteria are based on such vague and unmeasurable concepts as "should be acceptable for residences" (p. 4-118, *FEIR*). Furthermore, the *FEIR* sets vibration criteria as 3 to 5 dbA higher for institutions (including schools) than residences; however, the FHWA sets noise criteria considerably lower for schools (52 dbA L_{EQ}) than for residences (67 dbA L_{EQ}). The *DEIS* should both explain these apparent discrepancies and formulate an appropriate criteria for ground-borne vibration. In addition, the *DEIS* should disclose what corrective actions are to be imposed should vibration levels exceed the established criteria. (1)

- The *DEIS* indicates that "these criteria are estimated to be exceeded by only 1 dbA at this location [Alameda and Santa Ana Boulevard], and therefore the assessment of impact is marginal" (p. 4-47). This language appears to trivialize this identified "significant" impact (i.e., exceedance of threshold criteria). The reason performance standards (threshold criteria) are established is to form a basis for the determination of environmental impacts; to discount that criteria negates both the value of the resulting environmental analysis and the purpose of the established standards. Based upon this exceedance condition, the *DEIS* is obligated to find for significance; therefore, Table S-1 (p. S-36) should be revised to acknowledge that vibration impacts attributable to train movement will be "significant." (2)

  The *DEIS* indicates that implementation of Alternative 2.1A will "result in no adverse vibration impacts on adjacent properties" (p. 2-25). This assertion is not supported by the above citation in the *DEIS*.

- The *DEIS* indicates that "a further analysis of the vibration potential at this location [Alameda and Santa Ana Boulevard] will be conducted. To the extent that such vibration potential can be effectively attenuated through the design of the proposed project, appropriate design modifications will be made" (p. 4-47). Deferring the generation of information necessary to fully evaluate project-related impacts constitutes both an inappropriate mitigation measure and is contrary to the information collection requirements of NEPA (e.g., Section 1502.22 of the *CEQ Regulations)*. (3)

7.7.5 Energy

- The *DEIS* indicates that "the amounts consumed (on the order of 17,411 liters (4,600 gallons) of gasoline and 12.1 million liters (3.2 million gallons) of diesel fuel) are not considered substantial in comparison with regional fuel consumption and supply." Based upon information presented in the *FEIR* (Table 4-50, p. 4-128, *FEIR*), the presented volume of diesel consumption is approximately 0.6 percent of the entire annual regional consumption throughout the South Coast Air Basin. Under what criterion is this value "not substantial" and what is the basis for this criterion? (1)

- As indicated in the *FEIR* (Table 4-51, p. 4-130, *FEIR*), gasoline consumption includes both equipment estimates and workers' vehicles; however, only 100 vehicles are assumed for those projections. As indicated in the *DEIS*, the project is projected to generate "10,000 person-years of construction employment over a 10 year period" (p. 4-63); thus, based upon an annual average, an estimated 1,000 people will be employed during project construction. Based upon these assumptions, only one-in-ten workers will arrive at the job site via an automobile (or each vehicle will carry 10 workers). Neither assumption appears valid; therefore, the estimate of gasoline consumption appears to under-estimate the amount of fuel to be consumed during the construction stage. The City requests that the federal lead agencies re-examine their projections concerning this topical issue. (2)

- Although fuel consumption is "not considered substantial in comparison with regional fuel consumption and supply" (p. 4-47), the *DEIS* identifies a number of mitigation measures, stating "nevertheless, in the interest of promoting energy efficiency, the following mitigation measures will be implemented..." (*Ibid*).

  The *DEIS* fails to take a consistent approach to mitigation. A number of potentially significant impacts are identified wherein no mitigation measures are recommended or are eliminated based upon their perceived "cost effectiveness" (e.g., noise). Conversely, as stated above, notwithstanding the absence of significant environmental effects, the federal lead agencies have identified a number of measures based upon an undeclared objective of "promoting energy efficiency" (p. 4-47). In the presence of a significant adverse effect, it would appear reasonable to formulate a mitigation strategy to reduce and/or avoid those identified environmental consequences. Alternatively, if an impact is judged to be not significant, there appears no reason to include mitigation measures. Are the stated measures intended as "mitigation" or do the recommended actions constitute "operational parameters" of the project which comprise a component of the project description? (3)

4.7.6 Land Use

- In describing land use impacts, the *DEIS* makes the statement that "because these actions do (1)

not represent a major change to already existing uses and they do not impede the achievement of local planning goals as expressed in published general plans for the municipalities through which the project passes, they would not result in substantial adverse land use impacts" (p. 4-48). This statement misrepresents the potential land use impacts attributable to the project and fails to accurately represent the project's consistency with local land use policies.

The discussion of land use impacts involves both an examination of the proposed use (i.e., preferred project) and the potential impacts resulting from that use upon other adjoining or proximal properties and requires an examination of the project's consistency with each of the mandated (and optional) elements comprising the general plans of all affected communities. For example, since "the trench configuration poses operational problems for fire fighters" (p. 5-237, *FEIR*) and since "implementation of the consolidated corridor project could significantly delay the fire and emergency response time in some instances" (p. 5-235, *FEIR*), the project may adversely affect declared health and safety policies contained within those planning documents. Similarly, since noise "criteria are estimated to be exceeded by only 1 dbA at this location [Alameda and Santa Ana Boulevard]" (p. 4-47, *DEIS*) and since noise impacts upon the Exceptional Adult Education Center and Church of God of Prophecy will be "severe" (p. 4-106, *FEIR*), the exceedance of these standards cannot be construed as consistent with those land use policies which dictate performance standards for various residential and non-residential land uses. (1)

- The *FEIR*'s discussion of Alternative 2.1A concludes that: (1) "the partial taking of industrial structures between 41st Place and 46th Street is a significant adverse impact" (p. 5-52, *FEIR*); and (2) "the partial taking of a fast food restaurant building on the northwest corner of Alameda Street and Firestone Boulevard represents a significant adverse impact and is not consistent with the goals of the *County of Los Angeles General Plan*" (p. 5-53, *FEIR*). Although the reduced right-of-way requirements associated with Alternative 2.1B may have eliminated these actions, it is not readily possible to compare Alternative 2.1A and Alternative 2.1B to determine which of the properties identified in the *FEIR* are no longer included in the *DEIS*'s acquisition program. The mere acquisition of those properties and/or payment of relocation assistance does not convert a "significant" impact to an effect that can be deemed to be "not significant." (2)

4.7.7 Population and Housing

- No analysis of project-related impacts upon population and housing are contained in the *DEIS*, rather the *DEIS* states "for a detailed discussion of population and housing, please see Section 5.2 of the EIR" (p. 4-48). As indicated herein, the requirement that affected agencies, the general public and the project's decision-makers are required to flip back and forth between two complex and cumbersome documents restricts both the complete (1)

understanding of the project and its potential impacts, as well as serves to effectively limit the nature of public and agency comments that are presented upon the *DEIS*. Alternative 2.1B is clearly not Alternative 2.1A, therefore, a failure to present a project-specific analysis of Alternative 2.1B in the *DEIS* misrepresents the potential impacts resulting from that project. (1)

- As indicated in the *DEIS*, the project is projected to generate "10,000 person-years of construction employment over a 10 year period" (p. 4-63). Although no long-term labor projections are provided in the *DEIS*, the *Ports EIR/EIS* concludes that the "direct and indirect port-related employment in the five-county region was 60,039, with over 93 percent concentrated in Los Angeles County. Port-related employment in 2010 will increase to 107,602. Direct Port employment in the county is expected to increase steadily through the Year 2020" (p. 4J-3). The *DEIS* fails to fully examine the potential growth-inducing influence of the proposed project (as a vital increment of the expansion of the San Pedro Bay Ports), including the long-term cumulative impacts that these activities may have upon housing supply and demand ("this increase in demand would press housing costs upward," p. 4J-28, *Ports EIR/EIS*). (2)

4.7.8 Acquisition and Displacement

- The *DEIS* indicates that "about 1,200 employees would be displaced as a result of the proposed action. As indicated in the *FEIR*, "it is possible that many of these establishments could not continue their business, or may be unable to relocate in Southern California" (p. 5-130, *FEIR*). The City is concerned about this loss of local jobs. As potential mitigation, the federal lead agencies should explore the payment of relocation funds to displaced workers to enable those employees an opportunity to secure comparable employment opportunities within the general project area. In recognition of this concern, the City requests that the *DEIS* be expanded to include additional measures directed toward these displaced workers.

4.7.9 Transportation and Circulation

- The purpose of the Alameda Corridor is clearly stated as "to facilitate access to the Ports of Los Angeles and Long Beach through the year 2020 to accommodate anticipated Ports' growth, thereby reducing highway traffic congestion, air pollution, vehicle delays at grade crossings and noise in residential areas" (p. 1-1). The Alameda Corridor improvements are (and has always been) part of the expansion of the San Pedro Bay Ports. Yet, project impacts as defined in the *DEIS* exclude those associated with the expansion of the San Pedro Bay Ports. In doing so, the true project has been bifurcated to reduce the impacts reported in the *DEIS*. The project should, therefore, be more appropriately defined (and evaluated in the *DEIS*) as the expansion of the San Pedro Bay Ports, including the rebuilding of the ports' (1)

access system.

- The significance criteria identified in the *DEIS* are poorly suited to the (inappropriately defined) project addressed in the *DEIS*. This criteria has two parts: (1) the roadway improvements themselves must make traffic conditions worse; and (2) cumulative impacts must also be unacceptable. Since only the roadway improvements were included in the project definition, and given the biases in the cumulative and project analysis discussed herein, it is not surprising that the *DEIS* incorrectly concluded that the project would only have limited adverse impacts. The significance criteria, however, ignores several important factors, including:

  - The project definition must include expansion of the San Pedro Bay Ports so that the full impact of the project, including the increased truck, train and other vehicular traffic, is reported. This means that a "No Build" alternative, defined as no subsequent expansion of the San Pedro Bay Ports (including no increase in train trips), must be included in the *DEIS* as a base for project impact comparisons. (2)

  - The proposed roadway and railway improvements will dedicate a valuable and historic transportation corridor to a particular configuration. As such, the criterion must consider cumulative impacts beyond using them as a filter to declare some large project impacts as being insignificant. The proposed Alameda Corridor improvements will fully commit the right-of-way; however, even the understated cumulative impacts analysis in the *DEIS* anticipates volume to capacity (V/C) ratios as high as 2.0. The volumes would exceed the proposed capacity at 31 of the 52 intersections studied in the *DEIS* (p. 4-53) and eight additional intersections would operate at unacceptable LOS "E" conditions. Only 13 intersections, or one-quarter of the studied intersections, were projected by the *DEIS* to be at acceptable levels. Since the project will use up the right-of-way available to address cumulative impacts, it must consider all 39 of these other traffic impacts to be significant and must, therefore, recommend mitigation for those intersections.

- The *DEIS* assumes that provision of the improved rail facilities will dramatically decrease truck usage (p. S-4); however, no basis is presented in the *DEIS* for assuring that trucking will not continue its steady increase in share of freight transport, as has occurred throughout this century. While measures designed to reduce this nationwide trend from rail-to-truck may be desirable, the *DEIS* should not depend on the success of unproven measures. Rather, the traffic analysis should assume (as a very optimistic scenario), that the railroad improvements will allow rail transport to maintain its market share. As a result, truck traffic will increase in proportion to the overall freight handling capacity increase of the ship loading and unloading facilities of the San Pedro Bay Ports. (3)

- If the resulting environmental analysis fails to address the very real probability that the expansion which is being facilitated by the Alameda Corridor will also increase truck traffic in proportion to the growth of the San Pedro Bay Ports, then (in order to ensure the validity of the assumptions presented in the *DEIS*) the federal lead agencies (in cooperation with the port authorities) should establish a cap or maximum number of trucks (e.g., maintain truck traffic at current levels) allowed to access that facility during those future planning periods which encompass the analysis presented in the *DEIS*. In order to ensure that the assumptions utilized for the environmental analysis are both reasonable and accurately reflect future areawide conditions, the following additional mitigation measure should be added to the *DEIS*:

  - The San Pedro Bay Ports shall monitor all truck traffic entering and exiting San Pedro Bay Ports' facilities throughout the life of the project on a semi-annual basis. If total truck traffic entering and exiting either the Port of Los Angeles or Port of Long Beach increases above current (1995) levels, the respective port authority shall take all necessary actions (e.g., cessation of operations; closure of facilities) to reduce truck traffic generation to current (1995) levels.

  If the revised analysis assumes a level of increase in truck traffic which is less than the proportion of truck traffic to the total increase in the freight handling ability of the loading and unloading facilities, then a maximum ceiling (cap) at that assumed proportional level should be imposed upon the San Pedro Bay Ports. (4)

- The *DEIS* rejected the exclusive truck lane alternative based on: (1) costs of an elevated facility; (2) limited demand; and (3) air and traffic impacts from an elevated structure. The limited demand is directly a result of assuming that truck traffic to and from the San Pedro Bay Ports will decrease as a percentage of total traffic. This assumption is unfounded. As discussed below, other problems from using a limited study area contributed to the understatement of truck volumes. In addition, the relative costs of providing truck lanes at grade or in the depressed facility in conjunction with the rail facilities is not explored. This depressed truck lane option would both eliminate or effectively reduce the project's noise impacts and remove any question of the unsubstantiated traffic impacts of the elevated truckway. Traffic and noise impacts would be envisioned to be substantially less under this alternative, than comparable levels associated with the "locally preferred alternative." As a result, the City recommends that this alternative be addressed in an expanded *DEIS* since it appears to have the benefit of generating lesser environmental impacts than associated with the proposed project. (5)

- By only considering a four lane facility for Alameda Street, the *DEIS* is inconsistent with the *FEIR* analysis upon which it is based. This 4-lane alternative was specifically rejected in the *FEIR*. As stated in the *FEIR*, "alternatives providing only four traffic lanes were (6)

eliminated because of their inability to handle future traffic" (p. 5-5). As a result, the analysis presented in the *FEIR* cannot be relied upon to serve as the functional equivalent of an independent analysis appropriate for inclusion in the *DEIS*. In lieu of an independent assessment of the preferred project (Alternative 2.1B), the *DEIS* presents only a summary of the information developed as part of the *FEIR*; however, the conclusions outlined in the *FEIR* contradict those findings provided in the *DEIS*. (6)

- The calculations added in the *DEIS* to show that no "significant" impacts would occur are based on unreasonable assumptions. The *FEIR* stated that "an improved Alameda Street would attract trucks from parallel arterials" (p. 5-161); however, the *DEIS* assumes that "because Alameda Street would be reconstructed generally in its existing configuration, it would not attract additional traffic from north/south roadways in the region, as would the alternative previously considered that involve widening" (p. 4-54). In the following sentences, the *DEIS* contradicts that assumption by stating that "the removal of railroad/roadway grade crossings would improve traffic flow on Alameda cross streets by eliminating delays due to trains passing. In addition, the provision of left-turn pockets and improved signalization would improve the flow of traffic on Alameda Street" (*Ibid*). (7)

  A fundamental principle of transportation planning is that decreased delays and improved flow of traffic attract additional vehicles. This is the very basis of the trip assignment procedures used in computerized transportation models, including the one prepared for the *FEIR*. Thus, the *DEIS* cannot state both that conditions would improve and that no additional traffic would be added to the facility. The *DEIS* must be corrected to show the effects of the added volumes on both Alameda Street and the cross streets.

- The *DEIS* also appears to assume that volumes on the cross streets would remain the same despite what is identified in the *FEIR* (pp. 5-135 through 5-138) as numerous street closures. If these roads are to be closed, then the effects must be accounted for. If they are to be added as bridges in the preferred project, then that change from the previous analysis (as contained in the *FEIR)* should have been disclosed in the *DEIS*. Further, the relative costs of these added roadway versus a six-lane facility for Alameda Street must be discussed. Once again, the *FEIR* and *DEIS* appear to have major inconsistencies; thereby making the *FEIR* invalid as basis for the *DEIS*. (8)

- The procedure used to produce traffic projections for individual movements at intersections is very inaccurate. In describing the documents methodology, the *DEIS* states that, in order "to smooth out uneven growth rates from the model, an average growth rate was calculated for groups of intersections" (p. 5-161). Yet, as is evidenced by the existing conditions analysis results (Table 5-26, p. 5-156 *et seq.*, *FEIR*), adjacent intersections can have very different congestion levels and would not be expected to have smooth growth rates. (9)

Furthermore, "future turning movement volumes were projected for the year 2010 and 2020 for each of the scenarios, by multiplying the reassigned existing turning movement volumes by the growth factors calculated from the EMME/2 model" (pp. 5-164 and 5- 165, *FEIR*) This approach has two major inherent flaws: (1) different turning movements will grow at different rates based on the locations of related land-use development projects (such as more through traffic along Alameda Street being attracted to the Alameda Corridor by growth of the San Pedro Bay Ports); and (2) the use of a manual reassignment of traffic shows that even the persons preparing the model had little confidence in its predictive ability. A well prepared model should have been able to accurately predict the rerouting of traffic in the Alameda Corridor. (9)

- The *FEIR* analyzed 116 intersections; although the *DEIS* references the same number of intersections (p. 4-50. *DEIS*), Tables 4-14 (p. 4-52) and 4-15 (p. 4-53) only present the results of 53 intersections. The results at all 116 intersections must be presented so that the findings of the project's environmental analysis can be independently reviewed. (10)

- Only the evening peak period is analyzed; however, the morning peak period often has a higher level of traffic congestion. This would be especially true of areas with San Pedro Bay Ports' related traffic, which can be at its heaviest during the morning peak hours. Thus, an AM peak hour analysis must also be conducted for the *DEIS*. (11)

- The construction impacts section discusses extremely significant potential impacts (p. 4-55); however, only a nebulous mitigation measure is included which uses terms like "to the extent practicable" and "the possibility... is under consideration." This provides no assurance that the identified impacts will actually be mitigated. (12)

  The City recommends that all mitigation measures be structured to ensure their subsequent enforcement. For example, specific criteria limiting the length of time and distance for any detours should be set in place and requirements for maintaining access to all parcels clearly delineated. Without this type of specific measures, no subsequent monitoring will be possible.

- As described above, the expansion of the San Pedro Bay Ports must be considered as part of this project activity. Lacking this expanded project description, at a minimum, the *DEIS* (Section 4.8.9) must identify the cumulative adverse impacts attributable to the increase in vehicular traffic due to the expansion of the San Pedro Bay Ports. The *DEIS*'s current discussion (i.e., assuming that the project will reduce the unidentified impacts of that ports' expansion) is inadequate for both a secondary and/or cumulative impact analysis. Rather, this section must reflect the large number of failing intersections projected throughout the Alameda Corridor. (13)

- Section 4.10 of the *DEIS* does not discuss the irreversible and irretrievable commitment of a very vital resource (i.e., the Alameda Corridor right-of-way) to the project. This project will commit the land area comprising the Alameda Corridor in such a way that any future solutions that may be needed to address the project's cumulative impacts may no longer be viable. (14)

- Nowhere in the *DEIS* is the obligation upon the federal lead agencies to design Alameda Street (defined as a Congestion Management Plan (CMP) facility in the *County CMP*) to meet CMP standards discussed. The majority of the intersections along Alameda Street will be failing CMP performance standards under the proposed project. The intended use of that right-of-way may make the future achievement of CMP requirements infeasible. The resulting design limitations associated with the introduction of overcrossings for cross streets will inhibit the ability of the Alameda Corridor right-of-way to be further improved to accommodate already "reasonably foreseeable" traffic demands for that roadway (e.g., widening of these structures is unlikely to be feasible at a later date). The *DEIS* must, therefore, address the impact that the proposed project will have upon local jurisdictions (i.e., being precluded from meeting CMP goals and losing significant gas tax revenues as a result of that inability). (15)

- The *FEIR* (p. 5-50, *FEIR*) identifies both significant parking removals and transit rerouting requirements which are not subsequently readdressed in the *DEIS*. It is unclear whether the reduction from a 6-lane to a 4-lane roadway results in a reduction in the need for these activities. As a result, the *DEIS* should either identify and discuss these impacts or, if they have been eliminated or reduced, the corresponding public and/or private costs attributable to these events and other consequences of eliminating those impacts should be discussed. (16)

- As indicated in the *FEIR*, "the reconstruction of Alameda Street will also provide an alternative to the Long Beach and Harbor Freeways for Ports related truck traffic" (p. 1-1, *FEIR*). Based upon this observation, the *DEIS* must address the consequences of clogging this relief valve by only providing a four-lane facility with numerous LOS "F" intersections. Mitigation measures, such as limiting the amount of San Pedro Bay Ports' related traffic or precluding operations during peak traffic periods, must also be considered. (17)

- As indicated in the *FEIR*, there is no difference between each of the project alternative analyzed to "promote economic development near and along the Alameda Corridor" (p. 2-1, *FEIR*). By reintroducing a previously rejected 4-lane alternative with unacceptable traffic congestion, this conclusion may no longer be valid. The *DEIS* must, therefore, address the inability of the purported "locally preferred alternative" to meet the primary goal established for the project. (18)

- The *FEIR* (Section 2.1.2) sets forward a number of traffic goals, including: (1) improve (19)

north/south travel speeds; (2) improve level-of-service of intersections; (3) improve connections to the I-105 and I-110 Freeways; (4) provide alternative route to parallel freeways (emphasize trucks); (5) improve emergency access; and (6) coordinate and interface with plans at corridor ends. By adopting a previously rejected four-lane alternative with extreme congestion, the *DEIS* fails to demonstrate the ability of the preferred project to meet the six goals cited above (out of the total of nine goals cited in the *FEIR*).

In addition, the *FEIR* (Section 2.1.4) lists a number of environmental considerations, including: (1) improve overall quality of life; (2) minimize projected air pollution; (3) minimize projected energy consumption; (4) develop a project compatible with adjacent land uses; and (5) resolve present poor or deteriorating situations. The five goals listed above (out of the total of seven goals presented in the *FEIR*) would not be met given the projected congestion of the proposed project. It should be further noted that the project's performance relative to these environmental goals must be the primary consideration of an *DEIS*. (19)

Based on the above comments, Table 2-1 (p. 2-27, *FEIR*) in the *FEIR* should be re-evaluated as part of the analysis presented in the *DEIS*. Those project alternatives, as well as those additional project alternatives added in response to public and agency comments upon the *DEIS*, should be examined in accordance to the criteria outlined therein.

- The *FEIR* (p. 2-9) presents the agencies' rational for dismissing exclusive truck lanes, including the three arguments subsequently repeated in the *DEIS*. The reasons why these arguments are inappropriate to a depressed truckway alternative have been summarized above. The *FEIR* also adds the argument that trucks would be added to the section through the City of Vernon where truck lanes could not be added. Even if truck lanes could not be added north of the I-105 Freeway, the provision of those dedicated lanes to the south of this facility would substantially improve regional truck access to the San Pedro Bay Ports (e.g., access is established as a major project goal). Further, the *FEIR* and, to an even larger extent, the *DEIS* dismisses the potential for truck or other traffic being increased due to improvements to only a section of that roadway. In arguing that a major truck traffic increase would occur further up-stream (north) by an improvement to a section of the facility located on the other side (south) of a major regional conduit such as the I- 105 Freeway, the *FEIR* creates a major inconsistency with the *DEIS*. In truth of fact, reduced delays on a street segment will cause increased traffic on that same segment. This basic principal which should be reflected in the *DEIS* analysis; however, the much weaker argument that up-stream improvements with an intervening freeway will cause a large increase in trucks should not be used to reject an alternative. (20)

- The dismissal of the majority of the project alternatives in Section 2.4 of the *FEIR* (repeated in the *DEIS*) fails to meet the requirements of the NEPA which require all alternatives to be given equal weight. (21)

- The *DEIS*'s noise analysis fails to present the specific parameters used in that assessment; however, two parameters listed in the *FEIR* appear invalid for continuing use in the *DEIS*. First, the *FEIR* assumed a 35 to 40 mile-per-hour (mph) traffic speeds (p. 4-91, *FEIR*). Given the projected heavy congestion, much lower speeds with sudden accelerations and braking and honking horns, must be assumed to continue from very early morning until well into the evening. Further, train lengths of 5,000 feet are assumed (p. 4-92, *FEIR*); however, the *DEIS* states that "a standard train length of 2,438 meters (8,000 feet) is assumed for intermodal trains leaving the Port of Los Angeles and the SP Intermodal Container Transfer Facility" (p. 2-20, *DEIS*). In conducting the project's noise analysis, a worst-case scenario (i.e., longest train) should be assumed. (22)

- The *FEIR* is based on traffic counts conducted between the years 1990 and 1992; the computer model was developed in 1991. In recognition that substantial changes have occurred since that time, the *DEIS* should utilize up-to-date information rather than data which is presently five years old. (23)

- The *FEIR* (p. 5-141) shows a very limited study area for the traffic analysis. A major new regional facility would not only be expected to have primary impacts, but also have secondary (indirect) impacts extending from the immediate project area to other areawide facilities. As trucks and other traffic shift from the I-110 and I-710 Freeways to the Alameda Corridor, those facilities will have some infill from other parallel regional facilities, as well as from surface streets. This infill will increase congestion on parallel routes, resulting in further shifting of traffic to the Alameda Corridor. This process will continue until an equilibrium is reached. A much greater study area is required to fully capture the primary and secondary impacts of the project. This is especially important since the high-occupancy lanes on the I-110 Freeway will also have strong primary and secondary effects outside the study area which must be fully accounted for. (24)

  The truncated study area used in the analysis may have strongly contributed to the unexpected low truck volume projections for the Alameda Corridor. When combined with the improbable projections for truck traffic generation from the San Pedro Bay Ports, the estimates of truck traffic in the Alameda Corridor must be considered to substantially understate truck and other traffic.

- Both the *DEIS* and the *FEIR* fail to state how the projections for truck traffic was generated, distributed and assigned within the transportation model. Appendix A to the *FEIR*, entitled *Appendix A: Highway Capacity and Level-of-Service Analysis*, may or may not have contained this information, but it was not circulated with the *FEIR* and is not readily available to the independent observer. The *FEIR* only states that: (1) "as part of the Alameda Corridor design effort, detailed traffic projects were made using the EMME2 [sic] model. (25)

Data from the truck origin-destination surveys were used to calibrate the model" (p. 5-160); and (2) "growth rates for each of the future scenarios were calculated using data from the EMME/2 model, which was developed and calibrated for the base year 1990. The methodology and assumptions for obtaining growth rates was approved by the Alameda Corridor Technical Working Group" (p. 5-161). The *DEIS* provides even less information. This limited disclosure hardly constitutes sufficient documentation of the numerous assumptions built into any model. Full documentation for all land-use, generation, mode split, distribution and assignment assumptions must be circulated for public review and comment. (25)

- The *FEIR* (p. 5-181, *FEIR*) states that "some intersections would not be able to meet the design goals." It then references an extensive set of improvements and goes on to state that "implementation of these improvements would be the responsibility of other agencies and jurisdictions." This conclusion was reached based on some improvements exceeding master plan designations. The correct statement should be that the project will be responsible for funding and implementing the improvements, but the local agencies will be responsible for updating their individual master plans. Shifting funding responsibility because of a local responsibility for approval is impermissible. (26)

- The *FEIR* (Section 6.1.1) contains a poor attempt at splitting two "functionally linked" parts of the same project. This section begins by admitting that "the purpose of the Alameda Corridor transportation project is to facilitate access to the Ports of Los Angeles and Long Beach through year 2020, by providing a set of freight rail and highway improvements that would also mitigate adverse effects associated with that growth." In recognition of the reliance placed by the port authorities on the Alameda Corridor for mitigation of the San Pedro Bay Ports' projected growth, either a full set of corridor improvements (resulting in acceptable levels of service) must be implemented or growth in the San Pedro Bay Ports must be phased to accommodate subsequent improvements along the Alameda Corridor (to adequately accommodate that projected growth). CEQA, NEPA and the CMP all require that one of these two alternative actions be taken. Shifting costs and obligations to other parties (e.g., local agencies) is contrary to the intent of these policy documents. (27)

- A number of roadways appear to have been excluded from the traffic analysis. Referencing Table 4-15 (2020 PM Peak Conditions) (p. 4-53), the *DEIS* should either include the following cross streets or document why these streets were omitted from the intersection analysis: (1) Segment C: Manchester Avenue, Century Boulevard and Rosecrans Avenue; and (2) Segment D: All intersections south of the SR-91 Freeway. Although impacts upon a number of these intersections may be documented in the Port Access Demonstration document, the analysis of these intersections appears appropriate based upon the project's potential impact upon traffic flow affecting these roadways. (28)

- The *DEIS* should explain why the following intersections (with Alameda Street unless otherwise indicated) which were addressed in the *FEIR* (as showing significant impacts) have not been re-examined herein: (1) Segment B-1: 37th Street, 38th Street, Vernon Avenue at Stauton Avenue, Vernon Avenue at Charles Street, 45th Street, Slauson Avenue at Holmes Avenue, and Vernon Avenue at Long Beach Avenue; (2) Segment B-2: Gage Avenue at Wilmington Avenue, Gage Avenue at Albany Street, Florence Avenue at Bell Avenue, Florence Avenue at Santa Fe Avenue, Leota Street at Santa Fe Avenue, Nadeau Street at Alix Avenue, and Nadeau Street at Santa Fe Avenue; (3) Segment C: Firestone Boulevard at Manchester Avenue, 90th Street, 92nd Street at Miner Street, El Segundo Boulevard at Mona Boulevard, Compton Boulevard at Willowbrook Avenue, Compton Boulevard at Santa Fe Avenue, Alondra Boulevard at Tamarind Avenue, and Alondra Boulevard at Santa Fe Avenue; and (4) Segment D: Proposed "AB" Street at Alameda Street, Pacific Coast Highway at Coll Avenue, and Henry Ford Avenue at Anaheim Street. (29)

- Most intersections contained in the *DEIS* show similar or slightly reduced levels of service from Alternative 2.1A, as presented in the *FEIR*. Based upon the declared similarity between Alternative 2.1A and Alternative 2.1B, the reader would anticipate that each of the study area intersections would experience similar impacts. As a result, the *DEIS* should explain why impacts upon each of the following intersections were deemed to be significant in the *FEIR*, but have been judged to be less than significant in the *DEIS*: (1) Segment B-1: Vernon Avenue (West), Vernon Avenue (East), Slauson Avenue (West), and Slauson Avenue (East); (2) Segment B-2: Gage Avenue (West), Gage Avenue (East), Florence Avenue (West), Florence Avenue (East), Nadeau Street (West), and Nadeau Street (East); (3) Segment C: Firestone Boulevard, 92nd Street, Tweedy Boulevard (West), Martin Luther King Boulevard (West), Imperial Highway (West), Imperial Highway (East), Lynwood Road, El Segundo Boulevard (West), El Segundo Boulevard (East), Compton Boulevard (West), Compton Boulevard (East), and Laurel Street (East). (30)

- The *FEIR* shows a number of intersections (which are not represented in the *DEIS*) that will experience significant traffic impacts, defined as LOS "E." The *DEIS* should, therefore, be augmented to include an explanation why the following intersections were omitted from that NEPA document: (1) Segment C: Imperial Highway at Proposed Santa Fe Avenue; (2) Segment D: Sepulveda Boulevard at Proposed "AA" Street, and Proposed "AB" Street at Alameda Street. (31)

- The *DEIS* indicates that "the intersections near Santa Fe Avenue would have lower levels of service with the project, but these decreases would not exceed threshold criteria for substantial impacts" (p. 4-54). Santa Fe Avenue roughly parallels the Alameda Corridor with many streets that connect the two. To which intersections does the *DEIS* specifically refer? Are any of these intersections projected to decrease level-of-service by more than 2 percent (criterion value) of roadway capacity? (32)

- The *DEIS* (Mitigation for Operational Impacts, p. 4-54) should include mitigation measures for those intersections deemed significant in the *FEIR*, but not addressed in the *DEIS*. (33)

- The *DEIS* indicates that "with careful planning, the adverse impacts [of the preferred project] can be reduced substantially." The *DEIS* should acknowledge that the project's post-mitigated impacts upon traffic and circulation will continue to be significant (i.e., LOS "E"). (34)

4.7.10 Public Services

- Neither the *DEIS* nor the *FEIR* present significance criteria. As a result, the entire analysis is empirical with no way to gauge the significance of the identified environmental impact. Criteria should be established in accordance with applicable guidelines for this type of analysis so that the significance of both the project (construction and operation) and the project in combination with other related activities (cumulative) can be discerned. (1)

- Although the *DEIS* identifies potential crimes against property ("the potential could exist for stolen property such as automobiles to either be taken into the depressed trainway and stripped or simply driven or dropped into the trainway," p. 4-56), none of the proposed mitigation measures included in the *DEIS* (p. 5-58) seek to alleviate this potential problem or address related impacts upon local police departments. Furthermore, since a number of access roads will be provided to accommodate emergency vehicle access into those depressed segments of the Alameda Corridor, those roadways may further compound this identified concern. As a result, the *DEIS* should include a discussion of how vehicle access to those roadways will be restricted and what, if any, addition design solutions are proposed to control unauthorized use by non-emergency personnel. (2)

- The *FEIR* states that "derailments account for 73 percent of all accidents involving hazardous materials...the vast majority were caused by three chemical groups: flammable gases, flammable liquids, and corrosives...seven percent of derailed tank cars from main line derailment/collision accidents released their contents" (p. 5-252, *FEIR*). Since "the potential could exist for stolen property such as automobiles to either be taken into the depressed trainway and stripped or simply driven or dropped into the trainway" (p. 4-56), it would appear reasonable that those actions may increase the likelihood of train derailments (e.g., debris on the tracks). All accident statistics referenced in the *FEIR* represent nationwide averages and do not specifically address the unique problems posed by urban areas. It is, therefore, unreasonable to utilize those statistical averages without adjustment (for urban population centers) based upon the *DEIS*'s declaration that materials will be "dropped into the trainway." (3)

- Although the access roads may be able to accommodate emergency vehicles, with three (4)

access points (p. S-27), the *DEIS* indicates that emergency vehicles may have to travel substantial distances before being able to attend to an emergency situation (e.g., "the trench configuration poses operational problems for fire fighters," p. 5-237, *FEIR*). This situation could potentially lead to unacceptable delays in the event of a need for an emergency response (e.g., major spill). Referencing the *FEIR*, "implementation of the consolidated corridor project could significantly delay the fire and emergency response time in some instances" (p. 5-235, *FEIR*). As now structured, the *DEIS* (and the *FEIR*) fails to provide a sufficient analysis of the potential health and safety implications of this declaration. As a result, the City requests that the *DEIS* include an expanded discussion concerning potential direct and indirect impacts attributable to delays in emergency response. 4

- The *DEIS* acknowledges local concerns regarding the ability of emergency response and fire department personnel to access the trench in the event of a derailment, chemical spill or other risk or upset condition (e.g., "fire department personnel from all jurisdictions consistently voiced the need to be able to deal with an incident in the trench from a below grade position, rather than from above," p. 5-237, *FEIR*). Because access to the trench would be limited, the project's design could both extend response time and hinder fire fighting/clean-up operations. Although mitigation measures presented in the *DEIS* (p. 4-58) include the placement of fire hydrants in the trench, presumably to combat incidence of fire, in the event of a petro-chemical spill and subsequent fire (as well as various other chemical products) water would only serve to spread the problem and wash chemicals into those storm drains which would be required to remove stormwater from the trench. 5

  The only method to effectively combat these types of fires and spills is with other chemicals used in neutralization or means to remove the oxygen from the immediate vicinity. Although the project proposes methods to treat entrapped water, many of the types of chemicals that could potentially be washed into the storm drain system would not be readily amenable to those forms of treatment typically used for stormwater remediation. As a result, the *DEIS* should address these secondary effects and provide viable mitigation.

- Since "fire protection within the trench will consist of a set of hydrants and a pipeline system" (p. 4-58), those hydrants may be susceptible to vandalism, allowing for the discharge of large concentrations of water (from the fire flow system) into these depressed rail segments. In recognition of this potential, the *DEIS* should present possible solutions to minimize the potential for this occurrence. 6

- The *DEIS* indicates that "temporary noise barriers may be required in some instances. (See also noise section, 4.7.3 of this EIS, for additional mitigation measures)" (p. 4-58). Despite this declaration, Section 4.7.3 of the *DEIS* makes no mention of the use of "temporary noise barriers" to attenuate construction noise. Based upon the potential application of this attenuation strategy to address construction-related impacts, the *DEIS*'s noise analysis must 7

describe this strategy and quantify the potential benefits to be derived therefrom. (7)

- Contrary to the declarations in the *DEIS* (p. 4-58), no mitigation measures are presented for either churches or schools in Section 4.7.3 of the *DEIS*. Either this statement should be removed from the text or actual mitigation measures formulated for these sensitive receptors should be generated. (8)

4.7.11 Safety and Security

- The *DEIS* states that "all reasonable and prudent efforts will be made to protect the public during the construction process" (p. 4-59). In lieu of this generalized statement, the *DEIS* should iterate what practices are to be followed and present supportable conclusions concerning the residual impact following the inclusion of these measures. Additionally, the document fails to discuss the impacts of safety and security on construction workers and possible methods to reduce the likelihood of injury to these personnel. This could be especially prevalent for the myriad utility crossings through both the trench area and Alameda Street that are undocumented; many of which are composed of vitrified clay and other materials that are undetectable using standard techniques.

4.7.12 Aesthetics

- The City and surrounding communities are actively involved in graffiti removal programs and seek to explore design solutions which may minimize the proliferation of tagging activities within the community. The construction of a "trench that would be approximately 9 meters (30 feet) deep below existing Alameda Street" (p. 2-9) has the potential to contribute to both this problem and increase local costs for removal. No discussion of this issue is, however, provided in the *DEIS*. In recognition of this issue, the *DEIS* should explore design variations and present a range of mitigation measures which may either diminish the likelihood of occurrence or off-set local public and private costs associated with clean-up activities. (1)

- The *DEIS* indicates that law enforcement activities will be enhanced through the use of "flood lights that can be activated by corridor or law enforcement personnel" (p. 4-58). No discussion is provided concerning how this "activation" may occur and the potential visual effects attributable to massive flood lighting over extensive area. What design controls are proposed to minimize both the intrusion of this lighting onto adjoining areas and prevent future vandalism to those features? (2)

  Although "flood lights" may enhance visibility during evening hours, lighting (in and of itself) will not serve to aid law enforcement unless adequate access is provided and independent security efforts are undertaken to assist other public efforts. The DEIS should,

therefore, be expanded to both elaborate upon potential impacts resulting from access constraints and should describe other private measures and design techniques which are being proposed to address this topical concern. (2)

4.7.13 Economics

- The *DEIS* indicates that "access to businesses and homes adjacent to the construction area would be impaired by road closures, blockage of driveways and traffic congestion" (p. 4-55); "for some businesses, especially small retail operations, prolonged construction could substantially affect their operation and viability" (p. 4-62). Since "construction activity could affect any one block for up to three years" (p. 4-63), the resulting effects may be so severe as to warrant additional job loss and closure of those affected businesses. No attempt has been made in the *DEIS* to quantify the potential impacts of those construction-term activities either upon the local business community or upon those public agencies who receive sales tax proceeds. As a result, the *DEIS* should be expanded to include a discussion of anticipated direct and indirect impacts upon local businesses during construction activities and quantify the potential effects of those impacts upon the taxable receipts of local entities. (1)

- The *DEIS* (p. 4-64) fails to address those types of businesses (e.g., wrecking yards) that if forced to move would be liable for the remediation of hazardous wastes at their sites. Under current law, unless these sites have been shown to contaminate the groundwater, create a public health hazard or be involved in a property transfer, they are immune from a remediation effort. Many of these businesses have a value that is far less than the potential clean-up effort. In recognition of this condition, the *DEIS* should address the potential remediation of these sites, including both public and private costs for those endeavors, and explain whether the cost of remediation activities have been previously included in the projects $1.8 billion budget or whether these costs are external to that project projection. (2)

- Since the *DEIS* indicates that "up to 16 partial acquisitions of commercial properties" (p. S-37) will be required for project implementation, the inclusion of "only parcels which are taken in their entirety by the project are included in the calculation of property tax losses" (p. 4-65) results in an under-estimation of the potential tax loss affecting local entities. Since this "partial taking" will reduce the amount of property and related tax paid by affected property owners, the resulting analysis fails to represent the lost revenues that may occur from the project's right-of-way acquisition program. The City, therefore, requests that the projected tax loss (by jurisdiction) include the potential effects of these actions and present a worst-case (or at least a more realistic) scenario. (3)

Subsection 4.8 - Secondary and Cumulative Effects

- Although the *DEIS* acknowledges that "the project may also result in cumulative effects

- As indicated in the *DEIS*, "the Federal Highway Administration and the Federal Railroad Administration are serving as joint lead agencies" (p. S-26) for this project. As indicated in Section 101(d) of NEPA, "the provisions of this subparagraph shall not relieve the federal official of his responsibilities for the scope, objectivity, and content of the entire [environmental impact] statement or of any other responsibility under this Act." NEPA does not allow the federal lead agencies to convey to other governmental entities responsibility for the technical adequacy or procedural obligations of the federal environmental compliance program. Therefore, notwithstanding actions of the "ACTA Governing Board," the federal lead agencies must independently certify that the EIS is undertaken in strict compliance with NEPA and its implementing guidelines and regulations. (2)

  Based upon this requirement, the federal lead agencies must identify and examine a range of reasonable alternatives which fulfill the intent of NEPA. By delegating responsibility for the identification of alternatives to another entity, the FHWA and FRA have failed to demonstrate their compliance with those mandates.

- In rejecting the City's requested alternative, the *DEIS* indicates that the following reasons were cited: "(1) the truck expressway would not meet the goal of attracting trucks away from parallel freeways; (2) the expressway would have undesirable noise and aesthetic impacts; (3) truck traffic would increase congestion in Vernon and Los Angeles at the northern end of the Corridor; and (4) the expressway would be more costly that [sic] other alternatives considered" (p. 5-2). The above comments have been provided without any technical information presented to support those assumptions. As a result, no environmental basis exists to support the elimination of this alternative from further consideration. In support of this position, the City submits the following comments:

  - Truck Expressway Would Not Meet the Goal of Attracting Trucks Away from Parallel Freeways. The attraction offered by freeways is the unobstructed flow of traffic movement; an expressway will accomplish the same objectives while offering the added incentive of a more direct vehicular route between the San Pedro Bay Ports and downtown Los Angeles. Under this alternative, the expressway would run parallel with the rail lines. As the rail lines are physically separated from local traffic, trucks utilizing this expressway will also minimize vehicle delays since local streets will be grade separated. In addition, by removing trucks from local streets, the traffic flow on those streets will improve (potentially producing a cost savings associated with the need for lesser local street improvements). (3)

  - Expressway Would Have Undesirable Noise and Aesthetic Impacts. By diverting a large percentage of truck traffic from local streets and placing those vehicles into a depressed roadway, the traffic mix upon local streets would change and traffic flow may be improved. These actions would produce a positive noise and air quality

City of Compton (by Burke, Williams & Sorenson)

Legal Comments

Section I.

No emphasis has been placed on one aspect of the project's effects, as compared with another. All effects, both beneficial and adverse, are disclosed. Regional effects are discussed where the region is the appropriate study area and local effects are discussed where the local area is the appropriate area of focus. Alternatives have been considered at all stages of project development that have led to the present definition of the project. A complete discussion of alternatives is presented in Chapter 2.0 of the EIS. The City of Compton's request for consideration of a covered rail and roadway facility has been considered at several stages in the history of the project (please see the response to the Mayor of the City of Compton's letter of February 7, 1995 above).

Section II.

Please see the response to the Mayor of the City of Compton's letter of February 7, 1995 for a response to the issue of consideration of the City's requests. As of the present time, a mitigation committee is not contemplated . The development of appropriate mitigation measures will be confined to the context of the present environmental document and the Record of Decision.

Section III.

No response is required.

Section IV.A.

1. The public comment period was established taking into account the fact that a CEQA process had previously been completed in which opportunity for comment had been extensive (six public hearing sessions were held and the initial comment period of 30 days was extended to 55 days, at the request of the City of Compton). The CEQ regulations do not set out a universal time frame for the comment period, providing instead that time limits be set which are "appropriate to the individual actions." (40 CFR 1501.8) One factor to be considered in determining the length of the time period is "the degree to which relevant information is known..." Since the affected parties which would be expected to comment on the EIS had already been involved in the previous CEQA process, and since the information being disclosed through the EIS was essentially the same as had been disclosed in the CEQA document, a 45 day comment period (as permitted under NEPA) for the EIS was felt to be adequate. In response to a request from the City of Compton, however, the City was given an additional 14 days to provide its comments. Thus, in accordance with the FHWA NEPA regulations, the comment period was set at 45 days (with an additional 14 days for the City of Compton).

2. The facility which has been requested by the City of Compton has been referred to its staff by the ACTA Governing Board, but the Governing Board has not directed that it be considered as an alternative within the context of this EIS. Please see the response to the City's letter of February 7, 1995. The indicated study can be found in Appendix H to this EIS.

3. Please see the response to comment 1.

Section IV.B.

1. The requested facility is not required in order to satisfy the project goals, nor is it required to adequately mitigate the effects of the project that were found to occur within the City of Compton. Please also see the response to the Mayor of the City of Compton's letter of February 7, 1995, for a more detailed discussion of this topic.

2. All of the environmental topics identified in the first paragraph of the comment were examined both in the previous CEQA document and in the present NEPA document. Please also see the response to comment IV.A.2. above.

Section IV.C.

Reliance on previous environmental documents is allowed by 40 CFR 1500.5. Furthermore, 40 CFR 1506.4 states that "any environmental document in compliance with NEPA may be combined with any other agency document to reduce duplication and paper work." The analyses presented in the EIR were found to be acceptable to the federal lead agencies (in terms of satisfying NEPA requirements) and therefore were relied upon for purposes of the EIR.

Section IV.D.

The City's alternative does not constitute an alternative that has been embraced by either ACTA or the federal lead agencies. It has been considered but has not been adopted by the ACTA Board as a potential configuration for the Compton area portion of the proposed project. This action has been concurred with by the federal lead agencies.

The processes of developing the various project concept alternatives, selecting a final set of alternatives for inclusion in the CEQA process, identifying the "locally preferred alternative," identifying the alternatives to be documented in the DEIS, and considering the Compton proposal have all been conducted with the participation of the Federal lead agencies or their designated representatives. In the State of California, Caltrans is the designated representative of the Federal Highway Administration (FHWA). The ACTA Governing Board has as one of its members a Caltrans representative, and the Governing Board has been apprised of each of the processes identified above. Also, when the decision to engage the NEPA process was being considered, a series of detailed discussions took place that involved representatives of the FHWA from its California Division and Region IX. Furthermore, FHWA and FRA representatives have been directly apprised of the developments and discussions regarding the Compton proposal.

Section V.A.

1. Completion of the previous CEQA process has resulted in the selection of a locally preferred alternative. This preference is recognized in the current NEPA document, but in addition, the CEQA documentation for other alternatives has been included by reference for the NEPA process, and therefore the choice of another alternative has not been precluded.

2. The FHWA and FRA have published the material contained in the EIS and the previous EIR as analytical material for consideration by the joint federal lead agencies and also by the public. FHWA and FRA have conducted an independent review of this material, the results of which will be published in the Record of Decision. This independent review will include a review of all alternatives, including those mentioned in the EIR and incorporated into the EIS.

Section V.B.1.

Adverse effects that would be experienced by local businesses during construction of the project are discussed within the context of the project description (see Section 4.7.13.1). The discussion of such effects also assumes the use of typical construction methods and practices. It should be recognized that only conceptual engineering has thus far been conducted, and many of the issues raised in the comment cannot be addressed in detail until more design and construction staging work has been completed. However, for purposes of impact disclosure, the level of information provided in the EIS is commensurate with the level of knowledge regarding the project at the present time.

The locally preferred alternative for the Alameda Corridor project calls for reconstruction of Alameda Street in its present configuration, without adding more traffic lanes. This means that extensive disruption to the street itself can be avoided and the disruption associated with the street reconstruction can be managed in much the same way as typical street reconstruction and resurfacing is handled throughout the region on a daily basis.

The construction activities associated with constructing the depressed trainway will be confined to the extent of the railroad right-of-way to the greatest extent possible. However, it will be necessary for some portions of the construction zone associated with this activity to extend laterally beyond the railroad right-of-way. Since in most reaches of the Corridor there are parallel roadways on both sides of the proposed trainway (including the entire reach occurring within the City of Compton), it should be possible to move local vehicular traffic through a given area such that normal traffic patterns and access to local businesses can be maintained. It is the purpose of the traffic management plan to satisfy this objective.

The details of the traffic management plan, as well as other details associated with managing the construction process, will be developed more fully during subsequent stages of design and at such time as these details are available, they will be discussed with all of the local jurisdictions which would be affected by construction activities. Included among these additional details of the traffic management plan that will be developed in consultation with local jurisdictions will be

programs to address particular local needs, such as the business outreach effort. The City of Compton will be a participant in this process.

Section V.B.2.

As noted in the response to Section V.B.1, a traffic management plan will be developed to facilitate traffic movement during construction. Please see Section V.B.1 for more detail.

The conclusions reached with respect to the attraction of additional traffic from other major north/south roadways were based on the *Highway Capacity Study Report* prepared by DKS Associates to forecast vehicle and truck movements along the Corridor for the project planning years. This study tested several Alameda Street improvement alternatives for their ability to attract additional traffic and thus relieve congestion from parallel freeway routes. None of the alternatives tested, including widened Alameda Street with a separate exclusive truckway, were found to attract significant traffic from the freeways, due to the added travel distance and associated travel time. Forecast traffic increases largely came from nearby adjacent arterial routes and not the freeways. Maintaining the existing Alameda Street configuration was unanimously selected by the ACTA Governing Board as the locally preferred alternative and has been identified as the federal preferred alternative as well.

Section V.B.3.

The I-710 and identified Metro rail projects would not influence or be influenced by the Corridor, nor would they produce measurable additional impacts when considered in a cumulative sense. Those transportation projects which would be most closely related to the proposed project and which would contribute to cumulative effects are the Ports Demonstration Access Projects discussed in Section 2.10.2 of the EIS. A wide range of non-transportation projects which were located in the project study area were identified during the course of preparing the EIR (see EIR; Section 3.8.4, Table 3-5, Figure 3-22) and were considered in the course of conducting the impact analyses. To the extent that cumulative effects associated with the proposed project are known, they are discussed in EIS Section 4.8.

Section V.C.

As noted in the Summary of the EIS, FHWA and FRA have analyzed the impact of the Corridor on minority and low income communities. The project would not redistribute population or otherwise have an effect on area demographics. The project would not remove housing or cause residential displacement. The project would not affect neighborhood businesses or community services. Railroad noise from the project would be mitigated by the depressed trainway configuration and soundwalls, although when compared with the no project alternative the proposed project would have a beneficial effect. Traffic circulation and public safety would be improved as a result of the project. The project would also improve aesthetics in the area. Considering the overall benefits of the project, FHWA and the FRA have concluded that the Corridor does not disproportionately adversely impact minority or low income communities. .

Technical Comments

1.0 Authority to Comment

A response is not required.

2.0 Submittal of Comments

A response is not required.

3.0 Future Comments

(1) With regard to the request for an extension of time, please see the response to comment IV.A.2. above.

(2) Comments submitted by the City of Compton have been considered to the extent possible.

(3) Pursuant to section 1506.10 of the CEQ Guidelines, the lead agencies will take no action on the proposed project until 30 days after issuance of the FEIS. During that 30 day period, the City may offer further comments on the responses to its comments on the DEIS.

(4) FHWA and FRA believe they have satisfied requirements applicable to public involvement. A public hearing was held during the DEIS circulation period, as required. The City of Compton was represented by one elected official, several members of its municipal staff and a number of its citizens at the public hearing which was conducted.

(5) The EPA Administrator has not made the determination alleged in the comment, and therefore referral to CEQ is not in order.

4.0 General Comments

(1) FHWA and FRA believe that an adequate document has been circulated in accordance with the noted regulations and guidance.

(2) No previous reference by Compton to the alternatives mentioned (i.e., "redirect cargo to alternative port facilities; expansion of staging areas in proximity to the San Pedro Ports; increased reliance upon truck transport over rail service; multi-modal use of the corridor) has been found. The following provides a response to each of these suggestions.

Redirect Cargo to Alternate Port Facilities This alternative was considered in the original derivation of the cargo forecasts so that the Port of Los Angeles/Long Beach market share was appropriately reflected in the future relative to the other west coast ports in a west coast comparison study prepared by Vickery, Zachary and Miller in 1991. The cargo demands on the west coast of the United States are projected to exceed the

capacity of current and planned facilities by the year 2000. Even if it were possible to "divert" some cargo to another port, impacts would only be shifted to these areas and not eliminated. In some cases, other west coast ports have no facilities for certain commodities such as coal and petroleum coke. Because southern California and specifically the Los Angeles area is such a large consumer area, there are cost savings associated with accepting container cargo locally that is destined for the U.S. interior, since containers can be returned full to the region for export or for local consumption. Diversion of cargo to other ports and the resulting return of a portion the cargo back to Southern California would increase energy consumption and air pollutant emissions associated with increased train or truck travel.

Expansion of Staging Areas in Proximity to the San Pedro Ports If "staging area" refers to the rail yards, then the Ports are implementing rail yards with every major facility development and is part of the reason for implementing the Alameda Corridor. This has been identified as an air pollutant reduction measure in the AQMP (diversion of cargo from truck to rail). However, even with "staging areas" in proximity to the ports, cargo still needs to be distributed away from the ports to the region and the nation and, therefore, needs to pass through local jurisdictions.

Increased Reliance on Truck Transport Over Rail Service The major emphasis of the Alameda Corridor is to consolidate freight transport to the greatest extent feasible on a single grade separated rail corridor. The major environmental benefits of such an undertaking in terms of reduced traffic and air emissions has been recognized by SCAG and the SCAQMD in their planning documents and is identified in the EIS. If rail transport were eliminated in favor of trucks, local jurisdictions would be subjected to increased traffic and associated increases in air pollutant emissions.

In addition, please see the response to comment V.A.1.

(3) All alternatives described in the combined EIR/EIS are under consideration. The locally preferred alternative was identified as such in the DEIS since an action was taken to that effect. However, based upon the environmental effects which have been documented, the locally preferred alternative is likely to also become the federally preferred option. This determination, if it is so made, will be documented in the Record of Decision.

(4) None of the examples cited in the comment are essential to the choice among alternatives, although it is recognized that some information is currently lacking that will need to be known before the project can be fully implemented. For example, the data on rail accidents is not necessary to make a choice among project alternatives since all project alternatives would, because of improved design considerations, result in a lessening of risk due to rail accidents. Similarly, detailed knowledge of the extent of soil contamination is not required to make a reasoned choice among alternatives, since there are appropriate procedures which can be followed to adequately accommodate the contamination which may be found. Similar findings can be stated for the citations in the comment regarding construction disposal sites, potential floodplain encroachment and the emergency response plan. It should also be noted that for all the examples cited in

the comment, the requisite details and appropriate accommodation will be forthcoming in subsequent design and construction stages of the project.

(5) No other decision documents are contemplated.

(6) A Mitigation Monitoring and Reporting Program (MMRP) was prepared and adopted pursuant to CEQA. This MMRP is presumed to be in effect for purposes of the NEPA documentation. Mitigation measures and the monitoring procedures deemed to be necessary by FHWA and FRA will be so identified in the Record of Decision.

(7) Mitigation measures stated in the Mitigation Monitoring and Reporting Program have been adopted by ACTA pursuant to CEQA requirements. Mitigation measures intended by the federal lead agencies (including many of those already identified in the previous CEQA process) have been identified in the EIS and will be identified in the Record of Decision.

(8) The summary table will be reviewed and amended, as necessary, to be more comprehensive in its summarization of impact topics and impact findings.

(9) Federal agencies not commenting on the EIS can be presumed by their silence to not have substantive objections to the environmental documentation. With regard to the U.S. Army Corps of Engineers, coordination recently conducted has revealed that no substantive objections to the project exist and further that all technical matters can be dealt with during subsequent permitting. The I.C.C. is a cooperating agency to the present environmental document. With regard to the SHPO, concurrence will be required before the NEPA process can be completed.

(10) The Memorandum of Understanding among the FHWA, the FRA and Caltrans governs the preparation of the EIS. FHWA regulations were followed for preparing the EIS.

(11) The inside cover sheet of the DEIS indicates where comments and questions may be directed for each agency.

(12) The EIR accompanies the EIS volume and is considered an integral part of the NEPA documentation. The EIR volume was circulated along with the EIS, with the exception of those parties who had previously received the EIR. Such parties were asked to request another copy of the EIR if they so desired. The City of Compton made no such request.

(13) As is noted in EIS Section 4.1, Alternative 2.1B has lesser impacts when compared with Alternative 2.1A. Therefore, the analysis, findings, and mitigation measures of the NEPA process incorporate those from the former CEQA process.

(14) Alternative 2.1B is both an independent alternative and also a variation of the former Alternative 2.1A, by virtue of its physical configuration.

(15) Supporting appendix material to the environmental document was available for inspection during the public comment period at the ACTA offices and at the offices of its consultants. Representatives of the City of Compton were informed via a telephone conversation that these documents could be reviewed or copies could be made (at the direct cost of reproduction), either of which option is permissible for purposes of public disclosure.

(16) The comment is acknowledged. The format of the documents was intended to minimize duplication and is consistent with appropriate guidelines.

(17) With the exception of the potential for surface water contamination noted in the comment, it is not clear which topics the commentor is referring to. The environmental document provides sufficient indication as to impact threshold for environmental topics that it documents. With regard to the potential for surface water contamination referred to in the comment, the probability of occurrence is indeed embodied in determining the impact threshold, because it is a question of probability as to how frequent and under what circumstances a spill may occur. Since the proposed project would not alter the likelihood of spill-prone freight rail activity, but it would provide a rail corridor capable of substantially reducing the likelihood of a spill due to physical or mechanical reasons, the likelihood of surface water contamination would indeed be low; therefore it is reasonable to assign a "non significant" attribution to the potential impact.

(18) The environmental document attempts to provide the reader with definitions or explanations for terminology which is not in typical usage (see the Glossary, Appendix B, for further assistance in this regard). The environmental document attempts to provide the reader with descriptions of analysis methodology and assumptions where they are used.

(19) Every effort has been made in the development of the proposed project to incorporate such additional measures as might be appropriate to result in the lowest level of adverse effects practicable. Where normal regulatory controls are involved as contributing to the proposed mitigation, that is indicated.

(20) Each of the EIS sections will be reviewed to provide a description of the post-mitigation impact level; however, the commentor is referred to Table S-1 which does provide this information.

(21) NEPA does not prescribe or preclude the use of terminology appropriate to providing a complete and adequate description of a proposed project or its associated effects.

(22) It is believed that an adequate description of the comparisons between the no build and proposed project alternatives is provided.

(23) The purpose of the project is to improve freight movement; however, the project would have benefits primarily related to decreased traffic delays that would be realized by passenger vehicles traveling in the immediate vicinity of the proposed project.

(24) Summaries of the findings of all technical reports contributing to the EIR and EIS are provided in those documents. These reports have been made available for public review. Please also see the response to comment (15) above.

(25) The environmentally superior alternative (2.1A) is discussed in EIR Section S.9. The locally preferred alternative has a reduced level of impacts, as compared with Alternative 2.1A in the EIR, and therefore it is considered the environmentally superior alternative at present. The environmentally superior alternative will be identified in the Record of Decision, as required by 40CFR 1505.2(b).

5.0 NEPA

(1) The alternatives discussed in the EIR were incorporated by reference, and therefore it is believed that a reasonable range of alternatives has been included in the EIS. See response to comment V.A. from Burke, Williams and Sorenson, above.

(2) The conclusions drawn in the EIS regarding impacts are supported by sufficient evidence.

(3) FHWA and FRA believe they have complied with all NEPA requirements in connection with the Alameda Corridor, including the preparation and finalization of the Environmental Impact Statement. Incorporation of the EIR is allowed by 40CFR 1502.21.

(4) As noted above, a reasonable range of alternatives has been included in the EIS.

(5) The traffic impacts associated with Alternative 2.1B are appropriately disclosed in the EIS. Traffic modeling conducted for the project has indicated that the 4-lane facility would attract less traffic than the 6-lane facility proposed under Alternative 2.1A. The DEIS adequately analyses Alternative 2.1B. Also, please see the response to legal comment V.B.2.

(6) No federal actions have been taken which would be contrary to applicable regulations. No decisions have been scheduled other than issuance of a Record of Decision, which will occur subsequent to completion of the FEIS.

No final design, right-of-way acquisition, purchase of construction materials or rolling stock, or construction activities have been undertaken by ACTA or will be undertaken by ACTA prior to final NEPA compliance. The Ports of Los Angeles and Long Beach, using local funds, have separately negotiated for the purchase of existing railroad rights-of-way from each of the three operating railroads. Approximately 27% of required funding referred to local funds contributed by the Ports of Los Angeles and Long Beach. Federal funding for the related Ports Access Demonstration Projects has been provided through ISTEA.

(7) It is the lead agencies intent to use this EIS as a project-specific environmental document.

(8) The cover sheet, conforming to current FHWA standards, is provided.

(9) The federal lead agencies believe that sufficient documentation has been presented to support the findings in the environmental document.

(10) Such other factors as may be considered as part of the federal decision making will be documented in the Record of Decision.

(11) Other federal actions which may be required are listed in Section S.7 of the EIS.

6.0 FHWA Guidelines

(1) The project is a federal aid highway project within the meaning of the stated reference. Transcripts of the public hearings have been made and are available for inspection at offices of ACTA and its consultants, and at the offices of Caltrans. Excerpts are printed in the EIS.

(2) The cited section of the FHWA Guidelines will be satisfied as part of the processing of the FEIS, including identifying remaining unresolved issues.

(3) The FHWA and FRA Headquarters Offices have reviewed the EIS.

7.0 FRA Guidelines

(1) The project sponsors are not aware of any actions which must be taken later in time and/or are further removed from the improvements described as part of the proposed project. The required physical linkages between the Corridor and each of the railroad's main lines are discussed in the EIS. Other actions defined by the commentor as "programmatic" are not known to be required in order to enable the project to be implemented. The environmental document is a "project" document and not a "program" document, as alleged in the comment, and therefore project-level alternatives have been identified. FHWA regulations have been followed for preparation of the EIS. The broad-based public policy options discussed in the comment have been debated and agreed upon over the course of the project's 10-year development period. The project sponsors are a coalition of Southern California agencies and jurisdictions. A substitute project located somewhere else on the West Coast is not within the control of the sponsors.

(2) As a joint lead agency, the FRA would share in the discretionary decision making process which will culminate in the issuance of a Record of Decision. The roles of FHWA and FRA with regard to the environmental document are discussed in Appendix F. FRA's specific responsibilities are: (1) function as a joint federal lead agency, (2) be jointly responsible for the scope of issues to be addressed in the environmental document, (3) provide technical assistance with regard to intercity rail issues, and (4) approve the environmental document for public review. No specific source of federal funding has been identified. The extent to which other agencies are providing funding is described in Section S.4 of the EIS.

(3) The FRA will conduct such review as is necessary to ensure that the environmental record is satisfactory from FRA's perspective.

(4) The United States Army Corps of Engineers has proposed a plan to upgrade and improve flood control facilities through the project area. Implementation of this plan will have the result of containing the 100-year floodplain to existing (improved) flood control channels. The proposed project would not contribute a significant encroachment on a floodplain.

(5) The information necessary to judge the differences among alternatives is adequately presented in the EIS and it is not clear from the comment how such comparison is inhibited.

(6) With regard to the comment about solid waste, please see the responses to comments from the Los Angeles County Department of Public Works. With regard to coastal zone matters, please see Section 4.4.3.1 of the EIS and correspondence from the California Coastal Commission contained in Appendix F. With regard to irreversible and irretrievable commitments of resources, please see Section 4.10 of the EIS. With regard to mobility needs of the elderly, the proposed project is not a public transit project. With regard to potential impacts on recreational activities, please see Section 5.5 of the EIR and Section 4.7.10 of the EIS. The proposed project would have no impacts on bicycling or hiking opportunities.

(7) A discussion of Section 4(f) of the D.O.T. Act, and its relationship to the proposed project is provided in Section 4.3.4 of the EIS.

(8) FRA Headquarters staff reviewed the EIS and provided comments to FHWA Region IX, in San Francisco. These comments have been incorporated into the document. The document cover sheet was signed by the FRA Administrator, Jolene Molitoris.

(9) Mitigation measures which are adopted by the federal lead agencies as conditions of approving the project will be referenced in the Record of Decision for the project, including any monitoring actions which may accompany those measures. Also, the Mitigation Monitoring and Reporting Program which was adopted as part of the CEQA certification contains the desired notification requirement asked for in the comment. Comments on the EIS, as noted on the inside title sheet, could have been directed to the FHWA, FRA, or Caltrans. Mailing addresses are also noted on that title sheet.

(10) Mitigation measures, including those which may be considered feasible but were not adopted, and the various reasons for those decisions, are documented in the respective impacts sections of the document.

(11) Section 6.2 of the EIR contains a description of the unavoidable adverse effects associated with the alternatives examined in the EIR. A new section (4.11) has been added to the EIS to clarify the differences which would pertain to this topic within the context of the EIS, and the adoption of the locally preferred alternative. The unavoidable

adverse effects associated with the locally preferred alternative are less than those which were discussed for the alternatives examined in the EIR.

(12) Compliance with CEQ Section 1506.6(b) consisted of the following:

(a) Parties known to have an interest in the project and responsible and other agencies and jurisdictions were sent copies of the EIR and EIS directly. A listing of all parties receiving the environmental documents, including those known to have a prior interest, is provided in Appendix D of the EIS.

(b) Display ad notices of the availability of the DEIS and announcements of the public hearing were placed either February 22 or 23, 1995 in the following newspapers: *Los Angeles Times (South Bay & Southeast Editions)*, *Long Beach Press Telegram*, *Compton Bulletin/Carson Bulletin*, *Wilmington Beacon*, *Los Angeles Sentinel*, *Korea Times*, *La Opinion*, *Lynwood Journal*.

(c) A Notice of Availability was published in the *Federal Register*.

8.0 Caltrans Guidelines

(1) Socioeconomic impacts are discussed in Sections 4.7.7 and 4.7.8 of the EIS. Caltrans has been actively involved in the preparation of the EIS and its environmental policies have been followed in connection with the preparation of the EIS.

(2) Construction impacts are discussed under each environmental topic in a level of detail commensurate with the potential significance of the impact. It is not anticipated that there would be any population losses as a result of the project. The geographic areas associated with each impact topic discussed in the environmental document have been defined to encompass the area likely to be affected by the impact under consideration. Secondary and cumulative effects associated with the project are discussed in Section 4.8 of the EIS.

(3) The alternatives which have been documented includes those that are identified in the EIR volume (see Chapter 2) and in the EIS volume (see Chapter 2.0). It should be noted that all project alternatives would have the effect of reducing the aggregate adverse environmental effects associated with the No Build alternative.

(4) The cover sheet is provided immediately after the hard cover of the EIS document.

(5) Other federal actions required for the project are discussed in Section S.7.

(6) The railroad improvements identified as part of the alternatives are not under Caltrans jurisdiction. The range of alternatives discussed has been determined by the joint lead agencies to constitute a "reasonable range" of alternatives.

9.0 Environmental Justice

(1) Outreach efforts which have been conducted for the project have been extensive. During the CEQA process, numerous community meetings, meetings with local officials and staff (Compton in particular), and six separate public hearing sessions were conducted (including one at the direct request of Compton). Notifications of the public hearing included direct mailing of postcards (1,200 in number in the City of Compton), bilingual door hangers (distributed to some 23,000 addresses), newspaper advertisements and public service announcements. During the NEPA process, newspaper notices have been provided and a public hearing was held. In addition to the direct efforts of the staff involved with the environmental process itself, each of the corridor cities has representation on the Alameda Corridor Transportation Authority Governing Board, who are presumed to be providing their various constituencies with pertinent information concerning the project.

(2) A draft Department of Transportation Order was published in the Federal Register on June 19, 1995. FHWA and FRA will comply with this order. The EIS has addressed environmental justice considerations. Please see section S.10 of this EIS.

10.0 ISTEA

(1) With the exception of certain specific grade separation projects, the Alameda Corridor project has not been identified for funding through ISTEA in the past. The Alameda Corridor project does not specifically address public transit, although it would enhance the operation of public transit services in the study area as a result of the elimination of at-grade railroad crossings.

(2) The project is included in the current Regional Mobility Element and RTIP. Please see the comment letter from the Southern California Association of Governments.

(3) The project has been recognized in the current Congestion Management Plan. Please see the comment letter from the MTA.

(4) Please see the response to comment 1 above.

(5) The reasons cited in support of not conducting a Major Investment Study are stated on pages S-29 and S-30 of the EIS. These reasons were presented to the SCAG MIS committee and an exemption was granted.

(6) See the response to comment 5 above.

11.0 CMP

(1) The MTA CMP's statement that "Alameda Street will be replaced by a new alignment when the federal demonstration project is completed" (p.21, LA County MTA CMP) is not intended to require that an entirely new alignment of Alameda Street be constructed. The

MTA was merely acknowledging the Alameda Corridor Project as they understood it at the time the CMP was being drafted in 1992. MTA staff emphasized during the EIR process that CMP level of service standards do not apply for construction of new transportation facilities. Instead, the new Alameda Street project defines the level of service standard which must be met by all other future development which impact operations on the new facility.

(2) The commentor mentions the MTA CMP's indication that "the level of service (LOS) standard in Los Angeles County is LOS E" (p.22, LA County MTA CMP). That document in fact states:

> The level of service (LOS) standard in Los Angeles County is LOS E, *except where base year LOS is worse than E. In such cases the base year level of service will be standard.* [emphasis added]

The new "alignment" of Alameda Street defines the base year's LOS. The MTA would specify which year would be the base year under its process for adding new CMP routes according to Section 4.2.3 (p.21, County CMP). The conformity issue that the commentor refers to will be in fact be reversed. The MTA would modify the CMP network to conform with the Alameda Corridor.

12.0 CEQA

Those additional analyses which were required for purposes of satisfying NEPA were conducted as part of the EIS preparation. The information necessary to evaluate all alternatives is included in the combined EIR/EIS document. Public discussion concerning the range of alternatives was not reduced by the format of the document.

13.0 NOI

For a response to the portion of the comment dealing with a reduced range of alternatives, please see previous responses to other such comments. Insofar as the "locally preferred alternative" is concerned, a formal action so designating the project (defined as Alternative 2.1B) was unanimously taken at the ACTA Governing Board meeting of January, 1993. The City of Compton participated in the vote taken at that meeting.

14.1 Cover

(1) Caltrans' role in the present NEPA process is a partner of FHWA within the State of California, in accordance with normal FHWA operating procedures.

(2) The Alameda Corridor Transportation Authority has not been identified as a joint lead agency for the NEPA document, because the CEQA process, for which ACTA was appropriately identified as a lead agency, has been completed. ACTA has no jurisdiction solely under NEPA, since it is not a federal agency. Implementation of mitigation measures identified within the CEQA process have been documented in a Mitigation

Monitoring and Reporting Program for the project. Mitigation measures which may be expanded or additional measures which may be developed as a result of the NEPA process will be brought before the ACTA Governing Board for ratification and will be subject to oversight by FHWA/FRA.

(3) The San Pedro Bay ports are represented on the ACTA Governing Board and therefore they participate in the project in accordance with this representation. To the extent that the ports are implementing agencies for purposes of mitigation measures, they are so identified in the Mitigation Monitoring and Reporting Program.

14.2 Summary

(1) Although the earlier NEPA process was truncated before an environmental document was issued, Caltrans has been involved with the project on a continuing basis, and therefore a quasi-federal environmental process has been observed throughout. The EIR was written in a format which would have been satisfactory under NEPA, with an equal level of detail being given to all alternatives under consideration. Moreover, the CEQA document was reviewed by FHWA and FRA staff as part of the EIS for the present environmental process and the EIS was found to satisfy NEPA requirements.

(2) The selection of the SP San Pedro Branch as the corridor in which freight rail consolidation should be focused is the result of over 10 years of transportation planning efforts on the part of a collection of agencies having jurisdiction at the local, state and federal levels of government, as well as the railroads themselves. The other two corridors in which consolidation could logically be considered (the Los Angeles River and the UPRR San Pedro Branch), in addition to others, were examined thoroughly over this 10-year period. Furthermore, the Los Angeles River and UPRR San Pedro Branch were examined again as part of the concept engineering effort. There is ample evidence in the record to support the selection of the Alameda Corridor as the most appropriate location for freight rail consolidation.

There has been no attempt in any planning documents to disassociate the relationship between the ports and the Alameda Corridor; as noted by the City of Compton, both activities have been treated as related projects. Both the port's plans to accommodate maritime cargo and the Alameda Corridor are based on the same cargo projections. In turn, the truck and train projections are based on a cumulative assessment of cargo requirements through the year 2020. The infrastructure required at the ports and between the ports and downtown are those that would most efficiently accommodate the increase in cargo. While the project is the 32-kilometer corridor, it is not limited in its scope since the assessment included in the Corridor EIS includes the total cargo projection through the year 2020. In the absence of these improvements, there would be severe environmental impacts to the region due to inefficient handling of cargo.

(3) The 145 kilometers of tracks include the trackage owned by all three railroads serving the ports. The project will consolidate trains running to and from the ports onto the Alameda Corridor, leaving only local freight service on the other existing routes. Portions of the

Alameda Corridor are adjacent to or pass through USACOE-delineated floodplains as described in the DEIS. The practical susceptibility of the Corridor to closure requiring diversion of significant number of trains during peak flood conditions is minimal. Other existing routes also pass through similar floodplain areas, limiting the practicality of diversions during general widespread flooding conditions. Use of rail lines other than the Alameda Corridor on an operational basis is contemplated as part of the proposed project.

(4) The project goals are listed on page 2-1 of the EIS. The project alternatives were evaluated against these goals during the concept engineering effort. The ACTA Governing Board has determined that Alternative 2.1B satisfies the project goals.

(5) The proposed project does not necessitate any actions at the north end of the corridor. Consolidation beyond downtown Los Angeles is appropriately regarded as a separate potential future project under study by SCAG.

(6) The specific measures identified in the *Deep Draft Navigation Project* may or may not be applicable to the Alameda Corridor Project. The identified measure is applicable to new marine oil terminals to prepare a contingency plan in case of a spill. Very little rail cargo accommodated in the future would be liquid since most of these products are carried from the port in pipelines. However, an emergency control plan would be implemented for the consolidated corridor. The reader is referred to Section 4.4 of the EIS for mitigation measures applicable to the Alameda Corridor Project.

The Alameda Corridor was considered in the *Final Environmental Impact Statement/Environmental Impact Report Deep Draft Navigation Improvements, Los Angeles and Long Beach Harbors San Pedro Bay, California* (see page 3-59). The Alameda Corridor was also identified as an area of public concern within this document on page 1-10. While it is true that on-dock and near-dock rail yards do result in trains coming and going from the port, this is thought to be more efficient and more environmentally beneficial than having the cargo be moved by trucks. Again the Alameda Corridor is not being examined in isolation of the near- and on-dock facilities.

(7) Demand projections and assumptions in the documents cited are consistent.

(8) Future rail volumes upon which implementation of the Alameda Corridor are based are consistent with ongoing planning at the ports. The commentor's statement that "...regardless of port modification, the volume of trains utilizing the various San Pedro Bay Ports access routes will increase..." is not completely accurate. The cargo volume to a certain point will be the same. Whether or not that cargo is moved by train from the port is dependent on rail access to the ports. If rail access were denied, then there would be a significant increase in trucks transporting cargo through Compton and other local jurisdictions in order to reach downtown or the ICTF.

This same information applies to the interpretation that the 2020 Terminal Island Transportation Study implied that there would be increases in cargo volume without port

improvements. The study indicates that without the proposed on and near-dock rail facilities and rail access, rail traffic would not increase.

As pointed out by the commentor, a great many improvements are being made to improve the transportation system for trucks and trains. It should be noted that the capacity of the rail lines to accommodate increased rail traffic would occur over time. The Port EIR/EIS was referring to the trains being generated by the development of facilities through the year 2010 with anticipated improvements underway (e.g., Port Access Demonstration Projects). It was not referring to the total trains coming from all sources at the year 2020. To our knowledge there has been no reduction in the anticipated railroad volumes..."in light of the 'preferred project.'"

(9) The differences in tonnages reported in the *Alameda Corridor DEIS* (DEIS) and the *Deep Draft Navigation Improvements, Los Angeles and Long Beach Harbors, San Pedro Bay, California EIR/EIS* (Ports EIR/EIS) reflect differences between "current" and 2020 data that would reasonably be expected for two documents produced several years apart. The DEIS relies on much more recent information than the Ports EIR/EIS, which was published in 1992 using 1987 forecast data. More specifically:

- The 99 million metric ton figure in the DEIS is a 1993 U.S. Army Corps of Engineers measure of actual tonnage through the Ports in 1991.
- The 79.78 million metric ton figure in the Ports EIR/EIS is a 1987 forecast of Ports tonnage in 1991.
- The 210 million metric ton figure in the DEIS is a 1991 projection of cargo tonnage in 2020. Its basis is the 1989 Wharton Econometrics forecast of cargo growth rates applied to 1990 actual cargo tonnage through the Ports.
- The 197.4 million metric ton figure in the Ports EIR/EIS is a 1987 Wharton Econometrics forecast of tonnage in 2020.

(10) Implementation of on-dock and near-dock rail yards are assumed to be in place and operating at expected volumes by the year 2020. The effects of these proposed improvements are documented in various environmental documents published by the ports.

The ICTF is a facility which is already constructed and operational and therefore is not a related project. The on-dock and near-dock rail projects are included in the document by virtue of the fact that the truck and rail traffic accommodated by these facilities is used as a basis for the assessment of impacts. The Deep Draft Navigation Document is a programmatic document associated with new facilities at the Port of Los Angeles. It should also be noted that economic growth is a regional phenomenon and has been included in the planning documents developed by SCAG. The Alameda Corridor and related port development have all been incorporated into the appropriate planning documents.

(11) Evidence of coordination with the USACOE is provided in Appendix F of the EIS.

(12) Alternatives to the development of the San Pedro Bay ports are discussed in the *Deep Draft EIS*. The Alameda Corridor is intended to serve projected levels of rail activity forthcoming from the ports, and therefore the proposed mitigation measures would be commensurate with such levels of use.

(13) Please see the responses to other similar comments.

(14) The rail activity forecasts have been developed using the most current planning forecasts for cargo volumes. They are believed to represent the upper bound of train volumes for the project planning horizon which is the year 2020.

(15) An alternative using the UPRR corridor was studied. The alternatives suggested by the City of Compton have been given consideration and have also been rejected by actions of the ACTA Governing Board and its Technical Working Group, for the reasons stated in those actions.

(16) Locomotive hours of operation would be reduced as a result of trains operating more efficiently along the proposed corridor, rather than along their individual lines. The reduction in railroad emissions would be a direct result of the improved efficiency. Reductions in motor vehicle (including trucks) emissions are associated with reduced idling at grade crossings which would be eliminated as a result of the proposed project. Delays to emergency vehicles would be reduced as a result of eliminating grade crossings along the corridor and eliminating trains from traversing grade crossings on other lines. Compared to the No Build condition, the proposed project would reduce adverse effects on schools. Opportunities for effective management of freight movements within the corridor would be enhanced as compared with present conditions. It is logical to conclude that the potential for accidents involving train movements, including accidents at grade crossings, would be reduced as a result of the proposed project.

(17) Residential proximity to a proposed consolidation corridor is an indicator of likely adverse impacts, primarily associated with noise. Residential proximity is therefore a reasonable factor to consider when choosing among alternative corridors.

(18) Given the fact that the distinctions among alternatives were small may just as well be a confirmation that the corridor which was selected was indeed the proper location for consolidation, and further that the proposed alternative configurations for the corridor under consideration were defined in an appropriate response to their surroundings.

(19) The "apparent contradiction" has been clarified in the EIS. Please see Sections 2.5 and 4.7.9.

(20) The reduction of alternatives which took place during the concept engineering effort consumed over two years of study and included presentations to the ACTA committees and Governing Board, and subsequent further screening through the CEQA process. The

results of this evaluation are documented in the concept engineering reports which were made available for review at the time of their publication and which could have been reviewed during the current NEPA process, if desired.

(21) Please see the response to other similar comments.

(22) The City of Compton, through its representative on the ACTA Governing Board, voted in favor of the "locally preferred alternative" at the January 1993 meeting of that body. The controversy which had existed prior to that point was presumed resolved as a result of this action. The position which the City of Compton has articulated through its comments on the present environmental document appear to be in contradiction to the City's previously stated agreement with the proposed project configuration. Also, no evidence has been presented by the City to confirm the allegation that the City would be experiencing significant adverse impacts associated with the proposed project which would be reduced by the options suggested by the City of Compton.

(23) The railroad operating agreements have been entered into. They relate to the business operating conditions under which the three railroads would function. These agreements do not result in changes in the environmental effects as they have been disclosed.

(24) The two lines at the top of page S-28 should be deleted.

(25) The effects of the project, both positive and adverse, have been stated in direct proportion to the facts. Should the City wish to state its concerns regarding potential adverse impacts in quantitative terms, an appropriate response can be provided.

(26) The points itemized in the comment are noted for the record.

(27) The assumption of cost with regard to clean up of contaminated soils is not an environmental impact. Responsibility for such clean up will be determined in accordance with documentation provided in the EIR, EIS and operative agreements regarding purchase of the railroad right-of-way.

(28) The Summary table will be appropriately modified.

14.3 Chapter 1: Purpose and Need for the Project

(1) The source of this information is Appendix A to the Concept Engineering report, which was prepared by DKS Associates, 1992.

(2) The shift from trucking to rail for long distance goods movement purposes is a trend which has been occurring nationwide, and the San Pedro Bay ports are responding to this trend. The proposed project would have no influence on this modal shift, since it is based solely on economic considerations which are not under the control of the project. Expanded trucking operations, if it were in the control of the project, would act to increase adverse air quality impacts, which is one of the issues the City of Compton is

concerned with. One of the main objectives of the project is to divert cargo from the truck to rail and as proposed would reduce truck traffic by 23%. The environmental advantages of this regional goal have been previously identified and adopted by a number of regional agencies including SCAG, SCAQMD and the Alameda Corridor Transportation Authority of which Compton is a voting member. Goods movement by train is more energy efficient and environmentally beneficial. Even if this alternative had been recommended by Compton during the previous EIR comment periods or during the NOI comment period it would have been eliminated from consideration for the reasons stated above.

(3) If the Alameda Corridor project is not implemented, the expected growth in future railroad traffic would occur collectively on all three lines serving the ports. Given the increased population exposure which exists along these lines, adverse impacts would result which cannot be mitigated as well as if the added train volumes were concentrated in one corridor and the mitigation were to be focused in that corridor.

(4) The numbers referred to in the comment are approximations.

14.4 Chapter 2: Alternatives Considered

(1) The EIR has been included as part of the present NEPA process and has been recirculated to that effect.

(2) The "two-way roadway with dual frontage roads alternative", as stated in the DEIS, was rejected for reasons of cost and impacts. The alternative would require maximum right-of-way acquisition displacing numerous businesses and commercial facilities with resultant job losses and economic impacts. Alternatives were considered within the context of all of the goals of the project, not just cost. This alternative was rejected unanimously. As indicated in Table 2-2 of the DEIS, cost effectiveness, not construction cost, was the determining factor. In fact the lowest construction cost alternative, Alternative 1, was not selected as the locally preferred alternative.

(3) Please see the above response to comment 2.

(4) The alternatives identified in the table are those which had been considered in the concept engineering effort. The table describes the disposition of each of these alternatives after that point.

(5) The cost estimate for Alternative 2.1B includes approximately $120 million for the drill track which would be the responsibility of the SP. Private costs for other alternatives vary due to available right-of-way, required structures and utility relocations and other factors. For the No Build alternative, private investments to upgrade tracks and highway crossings would likely be required dependent upon the individual needs and standards of each of the carriers. Increasing public pressure for grade separations on each of the existing routes would likely result in requirements for both public and private investment.

(6) The Ports Access Demonstration Projects are being coordinated with the Alameda Corridor Project. All of these projects are located south of SR 91 and Compton Creek and are under the jurisdiction of other lead agencies. Under all alternatives, the Alameda Corridor location is generally controlled by existing track connection requirements, water way crossings and existing right-of-way availability. Specific track alignments and clearances are being coordinated with the Ports Access Demonstration Projects to ensure that no conflicts develop and that the requirements for each project are achieved.

(7) Access to the trench will be restricted by fencing along the corridor. Although access from each end cannot be totally restricted, the trench walls would be somewhat less attractive as a graffiti target since they could not normally be seen by nearby pedestrians or travelers and since they are depressed rather than in open view. In addition, *graffiti taggers* straying very far into the trench would have a high probability of apprehension.

(8) Both volumes (EIR & DEIS) were made available for public review.

(9) The residents and businesses will benefit from the Alameda Corridor by being supportive of the San Pedro Bay ports' competitive position relative to other west coast ports (with attendant direct and indirect employment benefits) and by creating direct construction employment. The amount of traffic expected on the drill track would not be substantial, perhaps several movements per day on a daily basis. The drill track would be used primarily for local deliveries, which would either remain at present levels or perhaps decline.

The definition of through trains is those trains not providing local freight service to customers along the corridor. No local freight service will be permitted from the Alameda Corridor main tracks. Many of the trains, however, will be destined for the freight yards near downtown Los Angeles including the East Los Angeles, Hobart and SP Transportation Center Yards. The Alameda Corridor Project will directly benefit local businesses and employees affected by both imported and exports goods and services.

The drill track is used to serve existing rail service customers located along Alameda Street. The number and size of trains required for local service varies dependent on the needs of the customer, however, trains of 10 cars or less, operating once daily would be typical. The long term trend has been the reduction in local freight service needs along this corridor and that trend is likely to continue. Therefore local freight service does not significantly affect the projected train volumes and the rail operations analysis and DEIS do consider the full range of mitigation measures to reduce impacts from forecast through train growth.

(10) The term Overland Common Point (OCP) will be more fully defined in the appendix.

(11) Increasing passenger service along near downtown Los Angeles will have significant effects on the efficiency of freight movements into and out of the Corridor. Passenger rail has priority over freight movements. Passenger rail and freight rail movements cross at Redondo Junction. Without the rail-to-rail grade separation of Redondo Junction

included in each of the build alternatives considered, delays in freight movements would significantly interfere with capacity and efficiency. Passenger movements using the Alameda Corridor are not anticipated.

(12) Access across the depressed trainway would be by means of the normal street system, with essentially no changes noticeable to the motorist other than the absence of delays at the former grade crossings. Alternative 1.0 would have required circuitous routing of motor vehicles to accomplish the same crossings.

(13) Those portions of the CEQA documentation which are solely applicable to that process (Findings, N.O.D., certification) are not part of the NEPA documentation. Those portions which apply to the federal process include adoption of the locally preferred alternative and those mitigation measures (as also discussed in the EIS) which are incorporated into the Mitigation Monitoring Program.

(14) The Ports Demonstration Access Projects are included as part of the cumulative impacts discussed in Chapter 4.

(15) At such point in time when the details of the construction process become known, adequate provision will be made for adjusting construction schedules to reduce adverse effects as much as possible. Standard traffic management practices will be used throughout the construction process. Work schedules will most likely be in accordance with the standards for the industry; the details will be determined prior to construction. During the construction period, shoeflies may be used for rerouting trains during construction, or the each of the three carriers may continue to use its individual line. If the corridor is constructed from south-to-north, a temporary rail line could be used to transport excavated material to the harbor. It is not possible to know which landfill would be used for disposal of excavated material; this would likely be at the discretion of the contractor. A landfill appropriate to the classification of the excavated material would be used. Excavated material will be tested in accordance with established procedures to determine the content, and if found to be hazardous, will be transported and disposed of also in accordance with established procedures and requirements.

(16) Clean materials can be reused or used for fill materials only as practical. If sites disturbed by corridor construction are found to contain contaminated soil or groundwater, the sites would be cleaned prior to or during construction in accordance with all applicable regulations and guidelines governing the removal and disposal of hazardous materials. On-site testing and monitoring during construction will ensure that contaminated materials are disposed of properly.

(17) The handling of contaminated materials, including the need for additional testing and other investigation prior to and during construction, is included in Section 4.5.2.1 of the DEIS. Final determination of remediation measures, if required, will be determined by appropriate state and federal agencies. Discussions of potential remediation techniques, if required, are also included in the DEIS. The DEIS further states that all pertinent local,

state and federal emergency preparedness and occupational safety procedures will be complied with.

(18) See response to previous comment 17.

(19) See response to comment 17.

(20) See response to comment 17.

(21) Appropriate permits for the use of excavated material as fill material in the ports will be obtained in accordance with the stipulations of such permits, if the material is used in this manner. It is not necessary to revaluate the placement of materials in landfills in the harbor since this has been previously assessed for ongoing and proposed fills in Los Angeles Harbor. It is appropriate, however, to discuss the construction scenario related to getting the material from the construction site to the landfill location.

(22) Please see response to other comments regarding solid waste, above.

(23) Materials will be recycled as practicable.

14.5 Chapter 3: Affected Environment

(1) Please see the response to Section IV.C.

(2) The description of the affected environment provided in the DEIS is matched with the topics that are discussed in detail in that volume. The EIR provides the descriptions of the affected environments matching the detailed topics which are discussed in that volume.

(3) The positions stated by the commentor are noted for the record; however, the characterizations of impacts as presented in the DEIS reflect the judgement of the lead agencies that impacts to be expected during construction of the project, while they may be substantial on individual businesses and at selected locations, because of their temporary duration and assuming the application of effective mitigation measures, are judged to be less than substantial after the mitigation measures have been applied. With regard to the property acquisitions, each affected property owner would be compensated for the market value of the property acquired, and therefore the residual impact would be less than substantial.

(4) The EIR was circulated with the DEIS. It is only the present commentor that has indicated difficulty in understanding the material as it has been presented. There is not sufficient justification for redrafting the material as suggested in the comment, since public and agency review has been extensive.

(5) The CEQA document which is being referred to is the EIR, which consists of the DEIR, as modified to reflect changes that were made in the FEIR as a result of the CEQA public

comment process. This is the EIR volume which was circulated with the DEIS volume. The mitigation measures shown in the EIR are part of the DEIS by reference, and they also have been incorporated into the CEQA Mitigation Monitoring and Reporting Program for the project. The federal lead agencies intend to adopt the mitigation measures indicated in the combined EIR/EIS document, insofar as they may apply to the project identified for implementation in the Record of Decision. Such additional mitigation measures as may be appropriate as a result of having gone through the NEPA process will also be identified in the Record of Decision.

(6) The remaining environmental topics have not been ignored. Additional analysis was required only for the topics noted in the comment in order to satisfy specific NEPA documentation requirements that were not previously covered in the CEQA document. For the remaining topics, the analysis presented in the EIR was deemed to also be satisfactory for purposes of NEPA. Section 4.7 of the EIS provides a comparison of the environmental impact findings for Alternative 2.1B with 2.1A for those environmental topics which were documented in the EIR volume. When compared with Alternative 2.1A, Alternative 2.1B would result in either equal impacts or impacts of lesser significance for these topics. The 4-lane configurations for Alameda Street were not analyzed in the EIR because they were reflected (for purposes of street traffic) in the No Build alternative. However, the locally preferred alternative which was adopted in January 1993 included the 4-lane configuration, and therefore that alternative (2.1B) is documented in the EIS. The traffic analysis presented in Section 4.7.9 provides this information. Rail traffic using the drill track would not contribute materially to noise and vibration since there would only be a small number of trains per day typically using this line, as compared with the nearly 100 trains per day on the consolidated corridor.

(7) The commentor cites the following sentence from the DEIS (page 3-2): "the most recent 1990 Amendments [*of the State Implementation Plan*] address nonattainment" (bracketed information added by the commentor). The statement in the DEIS does not refer to the 1990 Amendments of the SIP, rather it refers to the 1990 Amendments to the Clean Air Act.

(8) Table 3-1 has been changed to indicate a federal 8-hour CO standard of 9 ppm.

(9) The information presented in the DEIS text (page 3-5) was revised to reflect the projections and goals outlined in the *1994 Air Quality Management Plan*, with less emphasis on the *1991 Air Quality Management Plan.* These changes include a description of the new two-tier plan for control measures as shown in the revision to Table 3-2.

(10) Table 3-2 of the DEIS was revised to reflect information in the *1994 Air Quality Management Plan.*

(11) The commentor states that the DEIS conformity analysis must meet the requirements outlined in 40 CFR Part 51, as amended (Vol. 58, No. 228, November 30, 1993). However, this amendment applies to "all Federal actions, except Federal highway and

transit actions". According to the amended rule, conformity determinations for federal actions related to transportation plans, programs, and projects developed, funded, or approved under title 23 U.S.C. of the Federal Transit Act (49 U.S.C. 1601 *et seq.*) must meet the procedures and criteria of 40 CFR part 51, subpart T, i.e., fall under transportation conformity rather than general conformity guidelines. Because the Alameda Corridor project meets the transportation project criteria, it is excluded from the provisions of 40 CFR Part 51 as amended in Vol. 58, No. 228, November 30, 1993.

Additionally, 40 CFR Part 51 (Vol. 58, No. 228, November 30, 1993) does not state that the project must be a "major transportation project" or "major transportation investment" as defined in Section 450.104 of the Intermodal Surface Transportation Efficiency Act (ISTEA) (discussed on page S-29 of the DEIS) to fall under transportation conformity guidelines. In fact, these two regulations are unrelated.

(12) The comment is noted. The text has been changed.

(13) The discussion of the existing surface water resources and hydrologic setting is sufficient. As a part of the final design, a detailed runoff management plan will be prepared and NPDES Permit obtained to address water quality and stormwater permitting requirements. The trench segment will be designed to prevent overtopping during a flood event.

(14) See response to the previous comment, above.

(15) The proposed project would have no influence on the amount of hazardous materials being carried by the railroads. The only changes produced by the proposed project on rail operations in the context of hazardous materials (and the potential for related spills) would be: a) consolidation of rail activity within the Alameda Corridor, rather than the existing four-line arrangement, and b) creation of a new physical facility within the Alameda Corridor that presently does not exist. While it can be reasoned that the consolidation of trains into one corridor would increase the risk of upset for the occupants of that corridor, it can also be reasoned that the corridor's design and physical components, operating procedures and emergency response provisions would be superior to those which exist along the four lines currently serving the ports. The design and physical components would therefore make it less likely that accidents would occur, as compared with existing conditions. The operating procedures and emergency response provisions would make the corridor no less able to respond quickly and appropriately than under existing conditions, and it is reasonable to expect that the timing and appropriateness of the response would be improved when compared with existing conditions. It is therefore concluded that the Alameda Corridor would have a beneficial effect insofar as likelihood of railroad accidents and their related effects are concerned.

(16) A Phase II Environmental Site Investigation has been conducted for the project corridor, the results of which are reported in Section 3.5 of the EIS. Impacts associated with hazardous materials are discussed in Section 4.5 of the EIS and mitigation measures are discussed in Section 4.5.2 of the EIS.

Also, see the response to comment 17. If contaminated ballast rock, creosote or other hazardous material is encountered during construction, it will be handled appropriately.

(17) As noted in Section 4.7.11.2 of the DEIS, a comprehensive emergency response plan will be developed by ACTA in conjunction with all potentially involved agencies during the final design of the project. The plan will be reviewed and updated annually to reflect any changes in operating or emergency response requirements. The plan will be distributed to all appropriate authorities.

(18) At such time as the emergency response plan has been prepared and is available for discussion among the appropriate agencies, such agencies and governmental jurisdictions will be contacted for their input.

(19) The U.S.E.P.A. has expressed satisfaction with the manner in which its request for information has been handled regarding emergency response planning, stating in a comment letter (dated March 10, 1995), "We fully support the strategy outlined on pp. 4-60 and 4-61, and recommend that firm commitments for its implementation be included in the FEIS and Record of Decision."

14.6 Chapter 4

- **4.1, Introduction**

(1) The two-volume document (EIR/EIS) provides the information required under NEPA, for all alternatives under consideration. This approach was found to be acceptable to the lead agencies and in their judgement satisfies CEQ requirements. The physical differences between Alternatives 2.1B and 2.1A are described in Section 2.7 of the EIS. The physical components of the proposed project are shown in Figure 2-8.

(2) Please see response to LADOT comment 1.

- **4.2, Air Quality**

(1) Potential for toxic exposure due to excavation of contaminated soil and groundwater during construction activities was addressed in detail in Section 4.1 of the FEIR. A Preliminary Environmental Site Assessment (MAA Engineering Consultants, 1991) identified a total of 1,326 potential hazardous waste sites along the corridor. Forty six of these sites (located within a 400-foot zone) were classified as high priority, and of these sites 41 are not currently undergoing remediation, or they have been remediated but are not yet certified. These sites will be remediated prior to, or as part, of project construction.

Because of the uncertainty in the amounts and types of contamination that may be encountered during project construction, it is not possible to quantify potential health impacts from site remediation. As stated on page 4-73 of the FEIR, if contaminated soil is encountered during construction of the rail corridor or any roadway enhancement, it

will be remediated using techniques approved by the appropriate agencies. These techniques would also mitigate the release of volatile organic compounds (VOCs) into the ambient air, as required by SCAQMD Rule 1166. Generally, the majority of air toxics to be released into the atmosphere are expected to be VOCs, and therefore would also be controlled under Rule 1166. In addition, remediation activities requiring permits from the SCAQMD (e.g., air strippers or other groundwater pump and treat systems) would have to meet the requirements of Rule 1401 (New Source Review of Toxic Air Contaminants). This rule requires control equipment for sources that could potentially result in exposure to toxic pollutants causing a cancer risk of one in a million (1×10^{-6}) or greater.

(2) As stated in the FEIR, buildings in the proposed project area may be dismantled or moved to a different location. It is possible, although not anticipated, that some of these buildings may contain asbestos-containing building materials (ACBM). Because of the uncertainty of the type and quantity of ACBM that may be encountered, it is not possible to address the air quality impacts resulting from demolition of buildings containing ACBM. If ACBM are encountered during construction, procedures required by SCAQMD Rule 1403 will be followed, minimizing asbestos emissions.

(3) The construction equipment exhaust emissions presented in Table 4-1 of the DEIS were based on an analysis of prototypical construction segments in the "worst case" construction year. Emissions were estimated for three construction steps anticipated to contribute the most to total exhaust emissions (these steps were constructing embankments and excavating, constructing railroad track and related facilities, and restoring street improvements). The equipment presented in Table 4-10 of the FEIR (page 4-47) represent these worst-case construction activities.

Table 4-51 (page 4-130) in the FEIR lists an estimate of 70,000 project-related miles for haul trucks. Based on this mileage (assumed to occur over a 10 year construction period) and 1991 emission factors from the SCAQMD CEQA Handbook (Tables 9-5-J-(1),(10) and 9-5-K-(1),(10)), the estimated exhaust emissions generated by truck haul trips are: 1.7 lbs/day for carbon monoxide, 0.37 lb/day for nitrous oxides, 0.02 lb/day for sulfur oxides, 0.07 lb/day for PM_{10}, and 0.17 lb/day for reactive organic gases.

These estimates are conservative because 1991 emission factors are assumed for the entire 10 year construction period. Emissions would likely decrease due to advances in control technologies for mobile sources over the 10 year period. These emissions are negligible in comparison to those from the major construction tasks described above, and when added to the emissions presented in Table 4-1, do not change the overall conclusions of the analysis.

Table 4-51 (page 4-130) in the FEIR has ben revised in response to another comment to indicate an estimate of 200,000 project-related miles for worker vehicle trips. Based on this mileage (assumed to over a 10 year construction period) and 1991 emissions factors from the SCAQMD CEQA Handbook, the estimated exhaust emissions generated by worker vehicles are: 2.0 lbs/day for carbon monoxide, 0.015 lbs/day for nitrous oxides,

0.010 lbs/day for sulfur oxides, 0.0035 lbs/day for PM_{10}, and 0.10 lbs/day for reactive organic gases. Again, these emissions are negligible in comparison to those from the major construction tasks and when added to the emissions presented in Table 4-1, do not change the overall conclusions of the analysis.

(4) As stated on page 3-62 of the FEIR, either Portland cement concrete or asphalt concrete will be used for surfacing for road improvements. Although AP-42, A Compilation of Air Pollutant Emission Factors (U.S. EPA, 1985) does provide a methodology for estimating VOC emissions from asphalt application, this methodology only applies to cutback asphalt, which is asphalt cement blended with heavy residual oils, kerosene-type solvents, or naphtha and gasoline solvents. Similar VOC emissions are not expected from cement concrete or asphalt concrete since solvents are not added to the mixture.

Table 4-51 (page 4-130) of the FEIR lists a total project-related diesel and gasoline fuel usage of 3,207,650 and 4,667 gallons, respectively. Based on the methodology provided in AP-42, A Compilation of Air Pollutant Emission Factors (U.S. EPA, 1985) for estimating losses from fuel dispensing operations, 0.05 pounds/day of VOCs were estimated for project related fuel dispensing activities. This assumes that construction occurs over a 10 year period (with construction activity occurring 250 days per year). It also assumes that diesel fuel will be dispensed to construction equipment from tank trucks, that temporary fuel storage tanks will not be used along the construction site, and takes into consideration gasoline dispensing (at gasoline stations) to worker vehicles. The VOC emissions from fuel dispensing are considered negligible in comparison to the other ROG sources.

As discussed on pages 3-4 and 3-9 of the *Air Quality Impact Analysis Technical Report for the Alameda Corridor EIR* (Radian, December, 1992), volatile organic compound (VOC) emissions from architectural coatings and concrete-curing compounds were estimated for construction activities. Per SCAMQD Rule 1113 (which limits the VOC content of construction materials used in the SCAB) traffic paints and concrete-curing compounds have VOC limits of 250 and 350 grams/liter, respectively. Based on these limits and estimated usage data (i.e., gallons expected to be used for construction), VOC emissions of 37 and 34 lbs/day were estimated for traffic paints and concrete-curing compounds, respectively. These emissions were added to the 23 lb/day ROG emitted from construction equipment combustion, for a total ROG emissions of 94 lb/day, as indicated in Table 4-1 of the DEIS.

Several soundwall construction companies were contacted to determine if any coatings are typically applied to soundwalls. Conversations revealed that the soundwalls are pre-fabricated and the "color" impregnated into the wall at their facility. Also, masonry brick walls do not require painting. Therefore, painting of soundwalls is not considered a potential source of VOC emissions.

(5) As stated in response to comment on subsection 4.1 comment (1), the FEIR document (and supporting technical documents) is considered part of the DEIS and is therefore part of the NEPA review. The *Air Quality Impact Analysis Technical Report for the Alameda*

Consolidated Corridor EIR (Radian, Dec. 1992) provides a detailed discussion of the ISCST2 PM_{10} modeling methodology (pages 4-1 through 4-4). However, the PM_{10} ISCST2 modeling methodology used in the FEIR analysis is summarized below.

The Industrial Source Complex Short Term (ISCST2 or ISC2) air dispersion model was used to estimate the maximum 24-hour ground level concentrations of PM_{10} resulting from construction activities. Actual hourly meteorological data were used in the modeling.

A receptor grid (in x and y cartesian coordinates) with 50 meter spacing, as well as discrete receptors assumed to be located approximately 50 feet from the construction area and spaced 100 feet apart, were used to identify the highest 24-hour PM_{10} concentration.

The ISC2 model options were as follows:

- Area-type emission releases;
- Lynwood hourly averaged meteorological data from the 1981 calendar year (assumed worst-case for dispersion by SCAQMD);
- ISC2 model option for urban dispersion coefficients (Urban mode 3);
- Default wind profile exponents;
- Default vertical potential temperature gradient values;
- Plume rise as a function of receptor location;
- Buoyancy induced dispersion;
- No calms processing routine; and
- Variable hour-by-hour emission rates.

As stated on page 4-49 of the FEIR, this modeling methodology was approved by the SCAQMD prior to conducting the analysis.

The second part of this comment is unrelated to the question of ISC2 modeling. The ISC2 air dispersion model is used to estimate ground level concentrations of PM_{10} at receptors surrounding the project site resulting from construction activities. The ISC2 model is not used to calculate construction emissions. A description of how construction emissions were calculated is provided in Section 4.2.1 of the EIS and on pages 4-45 through 4-49 of the FEIR.

(6) The section heading title will be changed to "Operational Emissions."

(7) Text has been added to Section 4.2.2 to clarify the analysis.

(8) The locomotive emissions analysis which was previously presented in the EIR was found to be in error; a recalculation was done and now appears under Table 4-3. The relative proportions noted in the comment are now appropriately reflected in the table. With regard to motor vehicle (autos and trucks) hours of idle time at grade crossings, this analysis was done during the concept engineering effort and a spreadsheet analysis was conducted at each grade crossing, using either actual existing train counts or future projections based upon the concept engineering railroad operations analysis and existing/future vehicle counts/estimates. The data are believed to be correct as stated. The added proportionate idle time questioned in the comment has to do with increasing vehicular volumes over time (and associated queues) occurring at the same time that train volumes would be increasing, thus compounding the effects. The idle composite emission rates used in the analysis were calculated using the EMFAC7PC series factors. These were the rates deemed appropriate by the California Air Resources Board, and using the carbon monoxide factor as an example, yielded an idling emission rate of 0.80 grams per minute, rather than the much higher rate indicated in the comment.

(9) Table 4-3 has been corrected.

(10) All the assumptions and data used in the CALINE4 modeling (i.e., composite vehicle emissions, idle times at intersections and waiting for trains, ambient temperature, surface roughness, etc.) are presented in the *Carbon Monoxide (CO) Conformity Analysis for Alameda Corridor EIS* (Final Technical Report, Radian, 1994). This document also provides modeling input and output files for reference.

As indicated on page 3 of the *CO Conformity Analysis* document (Final Technical Report, Radian, 1994), vehicular CO emission rates (in units of grams per mile and grams per minute for idling) were calculated using the California Air Resources Board (CARB) EMFAC7F series model, as recommended by both CARB and the SCAQMD. The EMFAC7F model provides CO emission factors based on six different vehicular types (light duty autos, medium duty trucks, heavy duty trucks, urban buses, and motorcycles) and three different fuel types (catalytic, non-catalytic, and diesel). The model also provides percentages of each fuel type for each vehicle class.

Composite CO emission rates (representative of all vehicle and fuel types) for use in CALINE4 modeling files were calculated using the equation given in the SCAQMD *CEQA Air Quality Handbook* (Table A9-5-P-1, p. A9-73). All calculations of CO emission factors are presented in Appendix A of the *CO Conformity Analysis* document (Final Technical Report, Radian, 1994).

(11) Table 4-8 (Year 2020 Maximum 8-Hour Carbon Monoxide Concentrations) and corresponding text has been changed to indicate that a violation of the federal CO standard occurs only when concentrations are 9.5 ppm or greater.

(12) The commentor states that the DEIS conformity analysis must meet the requirements outlined in 40 CFR Part 51, as amended (Vol. 58, No. 228, November 30, 1993). However, this amendment applies to "all Federal actions, except Federal highway and transit actions". According to the amended rule, conformity determinations for federal actions related to transportation plans, programs, and projects developed, funded, or approved under title 23 U.S.C. of the Federal Transit Act (49 U.S.C. 1601 *et seq.*) must meet the procedures and criteria of 40 CFR part 51, subpart T, i.e., fall under transportation conformity rather than general conformity guidelines. Because the Alameda Corridor project meets the transportation project criteria, it is excluded from the provisions of 40 CFR Part 51 as amended in Vol. 58, No. 228, November 30, 1993. Additionally, 40 CFR Part 51 (Vol. 58, No. 228, November 30, 1993) does not state that the project must be a "major transportation project" or "major transportation investment" as defined in Section 450.104 of the Intermodal Surface Transportation Efficiency Act (ISTEA) (discussed on page S-29 of the DEIS) to fall under transportation conformity guidelines. In fact, these two regulations are unrelated.

(13) Potential air quality impacts and associated mitigation measures are presented in Table S-1 of the EIS. As indicated in this table, although criteria pollutant (NO_x and ROG) and fugitive dust emissions resulting from construction activities would be produced in quantities above significance thresholds established by the SCAQMD, these impacts are temporary and not considered substantial under NEPA.

(14) The discussion has been provided to be illustrative of the additional beneficial effects that could be realized if rail electrification were to become a reality. This information was included at the request of the California Transportation Commission.

(15) Parts of Table 4-9 (and corresponding text on page 4-15) have been modified to address Paragraphs 1, 3, and 4 of this comment.

Paragraph 2 -- Each of the mitigation measures listed in Table 4-9 are proposed to reduce pollutant emissions (ROG, NOx, CO, PM10) resulting from construction activities. Pollutant emissions from construction activities (including movement of construction materials) were included in the impact analysis (Section 4.2.1).

Paragraph 4 (last 2 sentences) -- The commentor states that the DEIS conformity analysis must meet the requirements outlined in 40 CFR Part 51, as amended (Vol. 58, No. 228, November 30, 1993). However, this amendment applies to "all Federal actions, except Federal highway and transit actions". According to the amended rule, conformity determinations for federal actions related to transportation plans, programs, and projects developed, funded, or approved under title 23 U.S.C. of the Federal Transit Act (49 U.S.C. 1601 *et seq.*) must meet the procedures and criteria of 40 CFR part 51, subpart T, i.e., fall under transportation conformity rather than general conformity guidelines. Because the Alameda Corridor project meets the transportation project criteria, it is excluded from the provisions of 40 CFR Part 51 as amended in Vol. 58, No. 228, November 30, 1993.

(16) Text on page 4-15 was modified to address this comment.

- **4.3, Cultural Resources**

(1) A "Negative Archaeological Survey Report" (ASR) was completed for this project by the Historical, Environmental, Archaeological, Research Team (H.E.A.R.T.) in June 1994. The ASR includes both a copy of the records search conducted by the UCLA Archaeological Information Center (See paragraph 1, Section 3.3.2.1 of the EIS) and the Phase I Archaeological Study (See paragraph 5, Section 3.3.2.1 of the EIS). A complete copy of the ASR may be found as Appendix A of the "Historic Property Survey Report" (HPSR) prepared for this project in August 1994, and referenced by the DEIS in paragraph 2, Section 3.3.3.2.

(2) Summarizes comments 3-12 which are addressed below.

(3) The text in the EIS has been appropriately revised.

(4) Every effort was made during the research and field phases of the project to identify areas of potential sensitivity within the project APE. There do not appear to be any "likely" areas along the route. In the best of circumstances, it is difficult, if not impossible to predict where prehistoric resources might be buried. The archaeologist must use all available data, the results of the field phase and a certain amount of judgment based on experience to accurately predict potentially sensitive areas. In the case of this project, background data; prior disturbances to much of the route; lack of visible surface evidence of historic or prehistoric resources, and the fact that prior research into other archaeological project which overlapped the route and produced nothing, indicated that the APE would not likely contain buried cultural resource remains

It is important to note that the potential for encountering significant buried historic archaeological sites not only predates 1869, but according to Federal guidelines, must encompass research within 50 years of the present day (1942). Therefore maps and archival data prior to and after railroad constructed were consulted.

During January and February of 1992 in order to determine the nature and extent of the cultural resources base which would be affected by the proposed project, a thorough and intensive archival-background research phase was conducted utilizing information from historical maps, archival data, and prior survey reports. There was no failure to inspect or research applicable maps and data pertaining to potential buried historic or prehistoric archaeological resources within the project APE. The potential for encountering such remains within the APE was considered nonexistent based on the results of the research phase and was substantiated by the results of the research phase.

(5) A Mitigation Monitoring Program has been adopted by the ACTA Governing Board. Appropriate mitigation measures pursuant to the federal decision making process will be reflected in the R.O.D.

(6) In cultural resource management, monitoring recommendations must have a basis in reality to be accepted by the lead agency; that is to say, there must be an existing resource(s) or anticipated resource(s) within the APE to proposed recommendations. Since the research phase and field reconnaissance program failed to yield data or visible indications or prehistoric and/or historic archaeological resources within the APE, a provision to recommend an area as being sensitive to existing resources or potentially buried resources was not warranted.

The two resources encountered during the research phase (CA-LAn-385 and CA-LAn-389) were recorded outside of the APE. Both areas were inspected and found to be highly disturbed, if not completely destroyed by present day development of the area. The fact that these resources were outside of the APE, and that this information was provided to SHPO and Native Americans without comment or additional recommendations, negates the need for further clarification or expanded recommendations.

To reiterate, the goal of an intensive archival-background research phase and field reconnaissance program is to address concerns pertaining to identified and unidentified cultural resources, as well as determine the likelihood and potential for encountering buried resources within the APE. Research indicated that during prehistoric and historic times the majority of the APE consisted of a floodplain/marshland environment. Prior to channelization the Los Angeles River shifted its banks, and scoured or silted the low-lying areas during flood phases. To date, there are very few indications of Native American habitation within the floodplain and marshland areas of the APE. Combined with development, the potential of encountering buried prehistoric archaeological resources is considered unlikely. The same can be said for historic resources, since research into historic maps illustrate that most of the APE was developed in the early-to-mid 1900s, primarily for railroad, commercial and/or industrial proposes. Finally, there is no indication that any buried resources which would meet Federal eligibility criteria exist within the APE.

Additionally, there is no need to have on-site archaeological monitoring anywhere within the APE as suggested; the expense for this kind of undertaking is not warranted given the results of the study. With regard to prehistoric resources, copies of the research and field phase reports were forwarded to the appropriate Native American concerns for review and comments regarding the recommendations advanced within the reports. There was concurrence that both reports adequately addressed their concerns and no additional recommendations, including monitoring, were necessary.

Finally, it will be the policy of the project to avoid cultural resources whenever possible. If buried cultural materials are encountered during construction, work in that area will be halted until a qualified archaeologist can evaluate the nature and significance of the find. Therefore, the reference within the context of the Alameda report is consistent with State policy which addresses Federal concerns.

(7) The additional requested information was provided to the SHPO in January 1995 and March 1995 in the form of updated excerpts for replacement into the Historic Properties

Survey Report. In the case of David Starr Jordan High School, the property was evaluated as a district under Criterion C and the boundaries of the eligible portion were confined to the contributing buildings. In the earlier submission, Jordan High had also been found eligible, but under Criterion A as a building consisting of interconnected parts. Since it had already been found eligible for the National Register, the SHPO's request did not change Jordan High's standing or applicability of federal or state laws.

Further evaluation of the pair of bridges identified as 53-C-0012 concluded that they were not eligible to the National Register because they are not outstanding examples of Art Deco style bridges and are common resource types within the community. Further evaluation of Bridge 2.41.5 concluded that the original 1906 Salt Lake route was not maintained and the bridge was not integral to its development and would not meet Criterion A.

In conclusion, the National Register eligibility or ineligibility of the identified properties presented in the DEIS did not change as a result of the requested information.

(8) The discussion of both the Rancho Dominguez Adobe and Pacific Electric Railway Watson Station are consistent with a finding of no effect under the *Criteria of Effect* (36 CFR 800.9(a)). The *Criteria of Effect* states: "For the purpose of determining effect, alteration to features of the property's location, setting, or use may be relevant depending on a property's significant characteristics and should be considered". The discussion of the Rancho Dominguez Adobe and Pacific Electric Railway Watson Station conclude with findings of no effect because such alterations are shown not to be relevant after consideration. If there had been reason to consider that an effect could occur on either of these properties, the *Criteria of Adverse Effect* (36 CFR 800.9(b)) would have been applied. The analyses of David Starr Jordan High School, Ritter Elementary School and the Redondo Junction Historic District were based on applications of the *Criteria of Adverse Effect*, under which a discussion of the "issue of potential transfer, lease or sale" may be considered relevant (36 CFR 800.9(b)(5)).

(9) In a February 21, 1995, Cherilyn Widell, the California State Historic Preservation Officer concurred with FHWA's determination "that the undertaking as presently configured would not adversely affect historic properties." A copy of that letter has been included in Appendix F of the FEIS.

(10) Coastal permit requirements with regard to cultural resources are only considered if thee will be direct impacts to these resources requiring excavation. Since this is not an issue within the context of this study, there is no need to reference or otherwise discuss the permit process.

(11) The comment is noted, text has been incorporated in Section 4.8.13 of the FEIS.

(12) Paleontological sensitivity along the Alameda Corridor will be treated under the mitigation measures in the Environmental Impact Report Mitigation Program. This program is

designed to reduce impacts to a minimum and will be included for those segments of the corridor that are sensitive for finding significant fossils.

A qualified paleontologist will be retained to prepare a mitigation program to reduce impacts to paleontologic resources within the Alameda Corridor. This paleontologist will concentrate his or her efforts in the high sensitivity areas within the Corridor which are located at the southern end of the project within Segments D-1, -2, and -3 of Alternative 2.1B and the northern Segment A which proceeds east from Alameda Street. Much of the central and northern Segments (A, B-1, B-2, C-1, C-3, C-3 of Alternative 2.1B) travel through areas of thick Recent sediments which have a low paleontologic sensitivity. The paleontologist will complete an archival search to determine what fossil localities are recorded within the right-of-way and will conduct a field survey for those corridor Segments (A, D-1, -2, -3 of Alternative 2.1B) determined sensitive for finding significant fossils. The paleontologic review will focus on the Pleistocene Lakewood Formation, areas of thin veneers of Recent alluvium over Pleistocene sediments and Pleistocene nonmarine. During the survey, recorded localities will be updated and sensitive sediments and any new fossil occurrences will be noted and documented. The limits of sensitive sediments will be refined and mapped.

From these findings, the paleontologist will produce a detailed mitigation plan that will include any necessary pre-grade salvage and a monitoring schedule suitable for the sediments underlying the Alameda Corridor. Recommendations for the proper fossil repository(s) will also be included. These efforts shall reduce the impact to scientifically significant and non-renewable resources to an acceptable level.

No further study of paleontological resources was required for the DEIS or FEIS because Section 106 of the National Historic Preservation Act (16 U.S.C. 470f) applies to "any district, site, building, or object that is included in or eligible for inclusion in the National Register." In order to be included or eligible for inclusion in the National Register, a property must meet the *National Register criteria for evaluation* which states:

The quality of significance in American history, architecture, archaeology, engineering, and culture is present in districts, sites, buildings, structures, and objects that possess integrity of location, design, setting, materials, workmanship, feeling, and association and

(a) that are associated with events that have made a significant contribution to the broad patterns of our history; or

(b) that are associated with the lives of persons significant in our past; or

(c) that embody the distinctive characteristics of a type, period, or method of construction, or that represent the work of a master, or that possess high artistic values, or that represent a significant and distinguishable entity whose components may lack individual distinction; or

(d) that have yielded, or may be likely to yield, information important in prehistory or history. (36 CFR Part 60.4)

The science of paleontology is excluded from disciplines of American history, architecture, archaeology, engineering, and culture mentioned in the *National Register criteria for evaluation*. Criteria (a) through (d) all involve some aspect of significance in relation to humanity's history or prehistory, not in relation to fossils or to geologic time or sediments.

Because paleontological resources would not appear to meet these criteria, Section 106 would not apply and such resources need not be addressed in the DEIS or FEIS.

- **4.4, Hydrology and Water Quality**

(1) The threshold criteria identified in Section 4.4, Hydrology and Water Quality, have been expanded to include a criteria for worker safety. As stated in the DEIS, worker safety within drainage channels or other construction areas will be protected by restricting construction during the historic wet season (Oct. 15 - Apr. 15). Worker safety during other periods will be ensured by maintaining controlled work sites and adequate supervision.

(2) The discussion of the hazardous materials impacts regarding the Dominguez Channel represents a unique case along the corridor. It is thought that contaminated sediments could occur within the Dominguez Channel. Disturbance of these sediments could result in contamination directly entering the water of Dominguez Channel. It is acknowledged that soil contamination could, in the event of rain, enter the local drain system and eventually the Los Angeles Harbor. However, this was not considered as serious a concern as at the Dominguez Channel crossing. Please refer to Sections 3.5 and 4.5, Hazardous Materials, for a more detailed discussion of soil contamination along the corridor. Also, see response to comment 13 (Chapter 3, Affected Environment).

(3) It is acknowledged in Section 4.5, Hazardous Materials, that contamination may be encountered along the corridor in areas other than those identified in government databases and the field sampling program. Remediation measures are also discussed in Section 4.5. Also, see response to comment 13 (Chapter 3, Affected Environment).

(4) The proposed project was not found to be in conflict with the objectives of state, regional, or local plans. As discussed in Section 4.4, Hydrology and Water Quality, construction of the project would require a General Construction Storm Water Permit and a General Industrial Storm Water Permit. A Storm Water Pollution Prevention plan would be developed as part of the permit process in coordination with the Regional Water Quality Control Board. Additional water quality control measures are identified in Section 4.4. Also, see response to comment 13 (Chapter 3, Affected Environment).

Beneficial uses of the surface waters crossed by the project are included in the *Regional Water Quality Control Board's Water Quality Control Plan for the Los Angeles River*

Basin. Existing, potential, and intermittent beneficial uses of Compton Creek, Los Angeles River, and Dominguez Channel include groundwater recharge, recreation, warm freshwater habitat, and wildlife habitat. The proposed project would not be inconsistent with these beneficial uses. Impacts to biological resources associated Compton Creek have been addressed in Section 4.6, Vegetation and Wildlife.

(5) Proposed pollution control measures have been identified in Sections 4.4, Hydrology and Water Quality and 4.5, Hazardous Materials. More detailed specific measures would be identified during the permit process in coordination with the Regional Water Quality Control Board. Also, see response to comment 13 (Chapter 3, Affected Environment).

(6) Extended periods of inclement weather may lengthen the construction schedule. The mitigation measure identifying a construction schedule within the drainage channels has been included within the summary table. Also, see response to comment 13 (Chapter 3, Affected Environment).

(7) It is acknowledged in Section 4.5, Hazardous Materials, that the potential harmful effects of any one accident could be serious. As discussed in Sections 4.4 and 4.5, an emergency response plan will be developed to respond to emergencies. Section 4.5 also discusses why the project would reduce public exposure to contamination in the event of a spill. Also, see response to comment 13 (Chapter 3, Affected Environment).

(8) As discussed in Section 4.4, Hydrology and Water Quality and Section 4.6, Vegetation and Wildlife, the proposed creek crossings would be subject to Section 404 of the Clean Water Act and 1601/1063 of the California Fish and Game Code. A Section 401 certification from the Regional Water Quality Control Board would also be required, as mentioned in Section 4.4.

(9) A description of typical beneficial floodplain values are provided in Section 3.4, Hydrology and Water Quality. These beneficial floodplain values are different from the beneficial uses established in the Water Quality Control Plan for the Los Angeles River Basin by the Regional Water Quality Control Plan. The beneficial uses of the surface waters crossed by the proposed project are described in response to comment (6), above.

(10) As described in Section 4.4, a 100-year or greater storm would require closing the corridor for water removal and inspection of the tracks. No additional permits or flood insurance requirements have been identified.

Work within the drainage channels would not occur during inclement weather. In addition, please see the response to Comment 6.

(11) The *Los Angeles County Drainage Study* was completed by the United States Army Corps of Engineers (USACOE) in 1987. The study identified flood control inadequacies along the Los Angeles River and Rio Hondo channels. The USACOE is planning to raise the levees along portions of these two rivers to provide added flood control capacity. Final design of the proposed project would be completed in coordination with the

USACOE to ensure that flood control capacities are maintained along Compton Creek and the Los Angeles River.

(12) In the event of a 100-year or greater flood it is possible, under current conditions, that all train lines into the ports could be inundated and therefore closed until the flooding subsides. Therefore, no one secondary route can be chosen in advance of such a situation. Should another event require the closure of the corridor, trains would, to the extent feasible, utilize existing tracks. Therefore, no one alternative route would be utilized.

(13) The depressed trainway is not intended to serve as a planned adjunct to the existing flood control system. In the event of a 100-year or greater flood the depressed trainway could capture flows associated with overflow of the Los Angeles River.

(14) It is acknowledged that the effects of an accidental release of hazardous materials associated with a single accident could be serious. An emergency response plan has been developed to respond to emergencies. A description of this emergency response plan is provided in Section 4.7.11, Safety and Security.

The impervious nature of the depressed trainway, as well as the remainder of the corridor, would also minimize the potential for groundwater contamination in the event of an accident.

- **4.5, Hazardous Materials**

(1) All parties commenting on the EIR were able to comment also on the DEIS. All local jurisdictions were made aware of the availability of the DEIS, and therefore no opportunity to provide input was foreclosed. The proposed mitigation measures listed in the EIR are incorporated by reference into the EIS. Mitigation measures appropriate to the topic are either embodied in the CEQA Mitigation Monitoring and Reporting Program and/or they will be referenced in the Record of Decision. Please also see the responses of other similar comments. It should also be noted that transport of hazardous materials by rail rather than trucks would result in fewer accidents.

(2) The Ports Access Demonstration Projects are under the control of agencies other than ACTA. Environmental clearance and control of the handling and remediation of contaminated materials encountered in construction, if any, will be the responsibility of others. The Alameda Corridor construction near the Ports of San Pedro Bay is above ground with limited excavations for foundation structures. As noted previously, any contaminated materials or groundwater will be handled in accordance with all appropriate laws and regulations.

(3) Responsibility for remediation of any contaminated materials encountered found during the design or construction of the corridor will be determined at that time, or at the time the necessary right-of-way is obtained for the project.

(4) Transport of materials by truck is not under the control of the proposed project. It is reasonable to expect a reduced level of rail accident potential and a heightened level of control as a result of the proposed project, by virtue of the added safety provisions that otherwise would not be in place and by virtue of the emergency control provisions that also would be in place. The data pertaining to actual quantities of hazardous materials being transported by means of rail cars is proprietary information and therefore only estimates can be developed upon which to base prognostications. Also, the accident data unfortunately are also difficult to use as a basis of projection, because they are collected and reported using a variety of inconsistent measurement techniques. To estimate a probability of projected accidents involving spills, and then to further estimate the hazardous conditions potentially arising from those spills, was not determined to be an exercise upon which sufficient reliability could be placed, particularly since the result of the proposed project would clearly be beneficial when compared with either existing or future/no project conditions. Insofar as accident scenario planning and hazard footprints are concerned, those topics will be addressed, as deemed appropriate by the agencies involved, when the corridor emergency response plan is prepared.

(5) The corridor emergency response plan is acknowledged on Table S-1 of the EIS, under the heading *Safety and Security*.

(6) Specific plans for remediation, if required, cannot be developed until the type, degree and extent of any contaminated materials, including contaminated groundwater are known. See also previous responses dealing with this same topic.

- **4.6, Vegetation and Wildlife**

The potential impacts to the disturbed wetlands have been included in the summary table. As discussed in Section 4.6, Vegetation and Wildlife, mitigation has been proposed at a minimum 1:1 ratio. Details of this mitigation would be finalized during consultation with the USACOE and the California Department of Fish and Game as part of the permitting process.

- **4.7, Other Impact Areas**

(1) The City is free to disagree with the lead agencies regarding the characterization presented in the EIS that the adverse effects of Alternative 2.1B are less than those of Alternative 2.1A; however the analysis presented in the document supports that conclusion. Unless the City can cite specific events which have occurred subsequent to certification of the EIR which would necessitate analysis other than what has been presented, it is presumed that such events have not occurred.

(2) The comment is noted for the record.

4.7.2, Topography, Geology & Soils

Design criteria for the Alameda Corridor include provisions for minimizing the risks associated with seismic events. All structures will be designed in accordance with the latest standards and

practices for seismic design of rail facilities. Specific seismic construction details will be developed during the design phase.

4.7.3, Noise

(1) The comment refers to an FHWA noise abatement criterion of 52 dBA L_{eq} for schools. This is the criterion for indoor noise levels, and is not commonly applied. The FHWA noise abatement criterion for outdoor noise levels is 67 dBA, as stated in the DEIS. Given that most buildings provide a noise reduction of at least 15 dB, the outdoor noise criterion is generally at least as stringent as the indoor criterion. All noise projections in the DEIS and FEIR refer to outdoor levels.

(2) The Holmes Avenue Elementary School, Ritter School, and Jordan High School were included as sensitive locations in the noise analysis. However, no noise impact was projected for these locations as a result of train operations.

(3) The terms "substantial" and "severe" are used to distinguish between different levels of noise impact. Drawing such a distinction without explicitly using the word "significant" is consistent with the procedures recommended by the Federal Transit Administration in its guidance manual for "Transit Noise and Vibration Impact Assessment," (April 1995). The threshold for noise impact is effectively 67 dBA CNEL, which is consistent with the FHWA noise abatement criterion of 67 dBA L_{eq}.

(4) As stated above, the threshold for noise impact is effectively 67 dBA CNEL, which is consistent with the FHWA noise abatement criterion of 67 dBA L_{eq}. The threshold for "severe" noise impact is higher than the threshold for "substantial" noise impact, and is not intended to be analogous to FHWA noise abatement criteria as the comment implies it should be.

(5) The figure cited from p. 4-39 of the DEIS refers to the increase in number of Southern Pacific trains accessing the Alameda Corridor under the "No Build" condition. The figure cited from p. S-4 of the DEIS refers to the increase in number of Southern Pacific, Union Pacific and Burlington Northern Santa Fe trains accessing the ports under the "No Build" condition.

(6) The addition of more traffic data to the DEIS would not affect the results of the noise analysis. Since the project is not expected to cause a significant increase in traffic flows, future noise from traffic was projected based on existing traffic noise levels, measured at the locations identified in Section 4.4.1 of the FEIR.

(7) This comment is highly speculative, but serves to illustrate the importance of performing a detailed noise analysis in preparing a DEIS. The noise analysis procedure for this DEIS is described in Section 4.4 of the FEIR, and accounts for factors not addressed in the comment, such as shielding between noise sources and sensitive land uses caused by intervening structures, excess ground attenuation, and the actual, measured noise levels of trains and traffic along the corridor.

(8) Even with construction of noise barriers, noise impact is projected for eight residences and two community facilities. Although noise barriers for these locations are not reasonable and/or feasible, other mitigation approaches should be explored during project design, such as improved sound insulation (as discussed in Section 4.4.6 of the FEIR) or improving the sound attenuation of the trench. General statements concerning the expected cost-effectiveness of specific measures are not meant to preclude the use of those measures; detailed cost-effectiveness calculations should be performed in the design stage of the project.

(9) Please see the above response to comment (8).

(10) The comment correctly identifies that impact pile driving is a noisy activity. As discussed in Section 4.7.3.6 of the DEIS, cast-in-drilled-hole piles should be used rather than impact pile driving near sensitive locations where feasible to minimize construction noise. Since the noise criteria are presented in terms of daytime L_{eq} and/or CNEL, impulsive or short-term noise levels are not explicit in the noise analysis.

(11) Section 4.7.3.6 of the DEIS clearly states that specific noise control requirements should be included in the construction specifications. Contractors will be responsible for meeting the specifications included in their contracts. Because discretion is generally left to the contractor about specific equipment and procedures that will be used to meet contract specifications, it is not possible at this time to provide detailed construction noise mitigation procedures for specific areas.

(12) As stated above, it is not possible at this time to provide detailed construction noise mitigation procedures for specific areas. Concerning limits on hours of construction, the least intrusive hours for construction will vary according to the land use in different areas. Nighttime hours are more intrusive for residences, but daytime hours are more intrusive for schools or other institutional land uses. The exact hours of construction will have to be determined for specific land uses or areas during permitting.

(13) Section 4.7.3.6 states that the project has the potential of creating substantial noise intrusion to communities along the corridor during the construction period. Refer to this section for a list of general procedures that will be used to minimize the noise intrusion.

4.7.4, Ground-Borne Vibration

(1) The vibration criteria for the DEIS are the same as for the FEIR. The difference of 3 to 5 dB between residences and institutions is consistent with the procedures recommended by the Federal Transit Administration in its "Transit Noise and Vibration Impact Assessment," (April 1995).

(2) The statement in the DEIS that the vibration impact projected for the residence at Santa Ana Boulevard is "marginal" because it exceeds the impact criterion by 1 dB reflects the large degree of uncertainty inherent in projections of vibration. In projecting future

vibration levels, a factor of safety has been added to the projected levels to ensure that the actual vibration levels will not be higher than the projected levels; in most cases the actual levels will be lower. The impact at this residence has not been ignored; however, it simply cannot be determined if mitigation is really necessary, or what form of mitigation is feasible, until additional design details are available.

(3) Please see the above response to comment (2).

7.7.5[4.7.5], Energy

(1) The proposed project would result in an estimated savings in diesel fuel consumption, primarily associated with locomotive travel, of on the order of five percent, which would be considered a beneficial effect. A significance threshold is not required for beneficial effects.

(2) Using an assumption of 500 worker vehicles per day, on average, which would reflect an average vehicle occupancy of 2 workers per vehicle would result in the following changes to Table 4-51: the consumption would be changed from 40,000 to 200,000, the gallons of gas consumed from 2,667 to 13,335, and the total gasoline consumed by the project from 4,667 to 15,335. These changes would be the same for Alternative 1 and Alternative 2.1A/2.2.

(3) Mitigation measures have been proposed in response to the individual impacts which may occur and in relation to their availability. In some cases this may give an impression of providing mitigation measures in excess of their necessity.

4.7.6, Land Use

(1) The effects of the project on land uses were assessed in terms of their consistency with local land use policies. Section 5.1.4 of the EIR identifies the land use impacts which would occur in each segment along the corridor. In instances where the project would result in property takes, Section 5.1.4 analyzes the potential conflicts of those land use impacts with local land use policies.

Land use impacts were considered significant adverse if they conflicted with city land use objectives expressed in general plans and land use elements (see EIR, p. 5-35). Land use impacts were also considered significant if the project caused the disruption of the physical arrangement of an established residential community. The Federal Transit Administration (FTA) thresholds of significance were used to determine the significance of the land use impacts of the project. In general, following the FTA thresholds of significance, significant land use impacts would occur in instances where the project would result in the following situations:

(1) acquisition of privately owned land is required and would result in relocation of ten or more residences and/or businesses

(2) adequate replacement facilities for displaced households and businesses are not available

(3) housing sites and/or funds to construct replacement facilities are not available

Under Alternative 2.1B, the project would not extend beyond the existing railroad right-of-way in the City of Compton and there would be no property acquisitions in the City of Compton. Hence, the project would not disrupt existing land use patterns and would not result in conflicts with the city's land use policies. To the extent that the at-grade drill track would serve industrial uses in the Belle Vernon area of Compton, the project would support the City of Compton's goal, as stated in the General Plan, to promote the continuation of industrial activities in Belle Vernon. As explained on p. 4-48 of the *DEIS*, when the corridor is completed and operational, the resulting improved transportation corridor would promote land use objectives, since traffic delays, safety considerations and other impediments would be removed.

With regard to the project's consistency with the mandated and optional elements of the local general plans, Section 4.7.6 Land Use (p. 4-48 of the DEIS) acknowledges that the increased use of the railroads may result in effects that are inconsistent with existing surrounding land uses, namely noise impacts, and refers the reader to the appropriate section of the EIR. As stated in Section 4.7.6 of the DEIS, Section 4.7.3 discusses noise impacts. Impacts related to public services and utilities are discussed in Section 4.7.10 of the DEIS and Section 5.5 of the EIR. Impacts related to safety and security are discussed in Section 4.7.11 of the DEIS and Section 5.6 of the EIR.

(2) Under Alternative 2.1B the roadway improvements along Alameda Street would be restricted to reconstruction of the existing number of lanes and the frontage road on the east side of Alameda would be retained as at present. Because Alternative 2.1.B involves reconstruction rather than widening of the Alameda roadways and at-grade bridges rather than above grade flyovers, private property acquisitions required for this alternative would be limited to selected locations at the north and south ends of the corridor and there would be no property takes south of 25th Street to approximately Sepulveda Avenue. Hence, properties between 41st Place and 46th Street and at the northwest corner of Alameda Street and Firestone Boulevard would not be taken.

Due to the changes in Alternative 2.1B, an estimated 20 residences previously subjected to adverse noise impacts under Alternative 2.1A could be avoided. In total, the preferred alternative would require partial acquisition of 16 private properties and full acquisition of 40 properties. These properties are either vacant or support commercial or industrial uses. The proposed project does not require the acquisition of residential property. Alternative 2.1.B would maintain local access to businesses that would have been affected under Alternative 2.1A.

As stated above, property acquisitions were considered to be significant if adequate replacement facilities for displaced households and businesses were not available.

However, CEQA provides that when adequate replacement facilities are provided for displaced businesses in accordance with the Uniform Relocation Assistance and Real Property Acquisition Policies Act, the property takes are considered to be not significant after mitigation. As explained below in the response to comment 4.7.8, FHWA and FRA would comply with the provisions of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970. Thus, property takes would be mitigated to a level not significant.

4.7.7, Population and Housing

(1) As indicated in the response to comment 4.7.6, Alternative 2.1B would result in fewer land use impacts than Alternative 2.1A. Alternative 2.1B would require partial acquisition of 16 private properties and full acquisition of 40 properties. These properties are either vacant or used for commercial or industrial purposes. Alternative 2.1B would not result in the acquisition of residential property.

(2) Growth inducing impacts of the project are discussed in Section 4J–Socioeconomics of the *Ports EIR/EIS*. Cumulative impacts on the housing supply and demand are addressed in Section 5.2.1.10 Socioeconomics of the *Ports EIR/EIS*.

4.7.8, Acquisition and Displacement

FHWA and FRA would comply with the provisions of the Federal and State law regarding relocation and assistance (California Government Code, Chapter 16, Section 7260 et seq., "Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970") which require the FHWA and Federal Railroad Administration and the Alameda Corridor Transportation Authority and its member agencies to provide payments and relocation services to eligible businesses and non-profit agencies displaced by the project. FHWA and FRA are not required by law to provide relocation or job assistance to employees whose place of employment is displaced by the project. No business relocations are anticipated in the City of Compton as a result of the proposed project.

- **Section 4.7.9, Transportation and Circulation**

(1) The *Ports EIR/EIS* concludes that "the impacts on housing prices would not be significant." (page 4j-28)

(2) Please see the response to City of Vernon comment 3.

(3) The reduction in projected truck trips is the direct result of locating on-dock or near-dock rail terminal facilities. This avoids the need to transport containers by truck to existing intermodal rail yards near downtown Los Angeles. It refers to projected truck growth relating to Port activity. It does not refer to a reduction in the absolute number of trucks. In fact the Highway Capacity Study Report did forecast growth in overall truck volumes.

(4) See response to comment 3, City of Vernon. The Study does forecast an increase in overall truck traffic to and from the Ports. The rate of growth, however, is significantly reduced by on-dock rail and the Alameda Corridor Project.

(5) The exclusive truck lane alternative was rejected because of cost and the fact that it would not attract significant truck volumes from the parallel freeway routes. Port related truck trips were projected to make up less than a third of all truck trips north of SR 91 and would be a small percentage of the overall traffic volume.

(6) The decision to reconfigure the roadway component of the proposed project was made at the conclusion of the CEQA process. The statement referred to in the comment was made at the outset of that process. It was decided (as has been described in responses to other comments) that evaluation of a four-lane roadway component in the EIR could be accomplished through inclusion of the No Build alternative, which was done.

(7) Alternative 2.1A from the FEIR included additional lane capacity for Alameda Street, which was projected to attract additional traffic from adjacent parallel north/south arterials. Alternative 2.1B does not include additional lane capacity but does include local intersection and traffic signal improvements to improve local intersection operations. The removal of grade crossings will significantly reduce delays associated with train movements, but will not add capacity to the routes because delays associated with periodic events such as train crossings are not factored in the traffic modeling analysis.

(8) As part of the adoption of Alternative 2.1B, it was determined that all existing grade crossings within the mid-corridor segment (SR 91 to 25th Street) would be replaced with grade separated crossings except Auto Center Drive South in the City of Compton due to adverse geometrics that would make a grade separation at this location infeasible. The analysis in the DEIS includes those intersections.

(9) See response to comment 7, Brian Sasaki, LA County Department of Public Works. The methodology is appropriate for a corridor study where detailed analysis of specific turning movements would tend to obscure the overall meaning.

(10) The results of the analysis are included in the *Highway Capacity Study Report* prepared by DKS and are available for review. The study included intersections away from the corridor permit accurate validation of the model. The inclusion of these intersections in the DEIS is not required.

(11) The analysis was performed for the PM period because 24 hour counts indicated that those volumes controlled for the majority of movements at study intersections. Since port related trucks make up only a small percentage of the overall trips within most of the corridor area, the additional analysis is not justified.

(12) These measures will be specifically addressed in the traffic management plans to be developed during the design phase in coordination with local authorities.

(13) See response to comment 3, City of Vernon.

(14) The past, present, and likely future use of the SP San Pedro Branch was and likely will be for freight rail purposes. The proposed project will not alter these consequences, and therefore will not commit a resource to an irretrievable or irreversible purpose.

(15) The federal lead agencies are not obligated to design Alameda Street to meet CMP standards. The corridor will not preclude the local jurisdictions from meeting CMP goals. In fact the local jurisdictions unanimously adopted Alternative 2.1B as the locally preferred alternative. In fact the cities may earn CMP credits as a result of the Alameda Corridor Project.

(16) Alternative 2.1B reduces the number of parking removals. No transit reroutings, except for possible temporary impacts during construction, are anticipated.

(17) As previously stated, analysis shows that trucks or other traffic are not generally attracted to Alameda Street from the adjacent Long Beach and Harbor Freeways. In the event of a serious disruption to traffic flows along one of the freeways, Alameda Street could be expected to serve as a temporary alternative route.

(18) The benefits of the locally preferred alternative to promote economic development near and along the corridor were well established. The locally preferred alternative was selected to minimize economic and social impacts caused by the wider right-of-way requirements.

(19) All of the alternatives considered addressed the stated project goals to a greater or lessor degree. The DEIS addresses in great detail the extent to which the locally preferred alternative addresses these goals.

(20) See the response to the previous comment.

(21) The range of alternatives included in the EIS/EIR combined documents constitute the range of alternatives evaluated in the context of the NEPA process. An evaluation of these alternatives has been conducted to an equal level of detail.

(22) Generally noise analysis is based on design operating speeds. Lower operating speeds due to congestion usually results in lower overall noise results. The noise analysis for trains was based on "average trains". The DEIS includes expected maximum lengths for trains from each source. Trains other than container trains originating from the Port of Los Angeles and the SP's Intermodal Container Transfer Facility would be significantly shorter than 8000 feet. The analysis is consistent and comparative with the typical operating conditions expected in the corridor.

(23) No significant changes are known which were not included in the planning forecast which would render the 1991 Study results unreliable for forecasting traffic in the project design years of 2010 and 2020. The region has experienced, over the last few years, a slow

down in background traffic growth rates experienced in prior years. Since this is primarily due to the economic factors, it should have little effect on the project design year forecasts.

(24) The study area was determined in conjunction with regional transportation agencies. In addition the traffic forecasts are based on the SCAG regional model. The results of the study indicate that the Alameda Corridor would not draw significant levels of traffic from the adjacent parallel freeways. Therefore studying a larger area is not justified.

(25) The *Highway Capacity Study* does address both the methodology and results of the traffic volume forecasts and is available for review at the offices of ACTA, the Ports of Los Angeles and Long Beach and DMJM / M&N.

(26) The DEIR includes intersection improvements which may be required to meet forecast traffic levels because of factors not related to either the project or to the growth in Port activities. It is not reasonable or practical to address all traffic growth with the Alameda Corridor project. The criteria for intersection improvements is to mitigate impacts above a threshold value with respect to the No Build scenario.

(27) The supportive relationship between development projects at the ports and the Alameda Corridor have been acknowledged throughout the development of both activities. A mutual dependency (which the comment implies) however, does not exist. The comment would therefore more appropriately addressed to specific development projects being undertaken at the ports.

(28) The analysis includes the Segment C streets named, i.e. Manchester Avenue is the same as Firestone Boulevard, Century Boulevard is the same as Martin Luther King Boulevard and Rosecrans Avenue is grade separated from both Alameda Street and the corridor. Ports Access Demonstration Alameda Street improvements south of SR 91 and cross street grade separations are discussed as related projects.

(29) Based on the results of the analysis for the FEIR and the project definition, street intersections away from Alameda Street and those intersections which do not cross the Alameda Corridor were not listed in the DEIS. "Tee" intersections to Alameda Street serving primarily local traffic are also not in the DEIS. The *Highway Capacity Study* did address those intersections and are included by reference to this study.

(30) See the response to the previous comment.

(31) See the response to comment (29).

(32) The Santa Fe Avenue intersection references are to the intersections near the grade separation with the Alameda Corridor, Washington Boulevard and 25th Streets. A mitigation improvement of adding a lane for eastbound right turn traffic on 25 Street is proposed to mitigate the project's impacts.

(33) See the response to comment (29).

(34) The statement referred to is under Section 4.7.9.3 Construction Impacts. With thoughtful planning, adverse effects from construction activities can be reduced substantially.

4.7.10, Public Services

(1) Significance criteria are stated in the various topical sections of the environmental document. The lead agencies will supply such criteria where they may be absent.

(2) Vehicle access to the trench will be limited to each end and an access ramp located between Compton Boulevard and Alondra Boulevard. Access to the ramp will be restricted and maintained locked. Although access through the ends cannot be physically restricted due to the openings required for train operations, security measures will be developed during the final design to monitor unauthorized access to the depressed trainway.

(3) The reference to *"stolen property such as automobiles to be taken into the depressed trainway"* was an anecdotal reference which was intended to be interpreted as such in the environmental document. Every effort will be made to render the corridor secure from such occurrences. A train derailment would clearly be uppermost in the minds of corridor authorities as an event to be avoided, and therefore appropriate surveillance and other mitigation measures will be provided to prevent this from happening.

(4) The DEIS acknowledges the issue of response to emergencies, including material spills and fires, within the trench. The trench, however, also would result in containment of spills and limiting exposure to the public compared with either the at-grade alternative or existing conditions. This issue will also be addressed in the emergency response plan. See response to comment 17 (Chapter 3, Affected Environment).

(5) See the response to the previous comment.

(6) See the response to comment (4).

(7) The comment correctly identifies that temporary barriers could be used during construction to minimize noise intrusion. Because discretion is generally left to the contractor about specific equipment and procedures that will be used to meet contract specifications, it is not possible at this time to provide detailed construction noise mitigation procedures for specific areas. The effectiveness of a noise barrier would depend on the height and extent of the barrier, and the locations of noise sources and sensitive land uses relative to the barrier. Where a noise barrier is feasible, it typically may be expected to provide a noise reduction of 5 to 10 dB at the sensitive land uses closest to the barrier.

(8) Mitigation measures will be employed, as required, to reduce adverse noise impacts upon churches or schools, unless such measures are not feasible.

4.7.11, Safety and Security

The high number of existing utilities under or near the construction area is acknowledged. Detailed utility investigations will be performed during the design phase of the project. The location of all high risk utilities will be field-verified and shown on plans. In addition, construction contractors will be required to locate and protect all underground utilities prior to starting construction activities in each area. Generally, vitrified clay pipe and inert pipe materials are used for sewers, drains and water lines, which generally do not present unusual safety risks.

4.7.12, Aesthetics

(1) Access into the depressed trainway will be restricted and continual surveillance will be maintained in order to prevent unauthorized people from entering it. As a result, the potential for graffiti occurring within the depressed trainway should be minimal. If it were to occur, it would not be generally visible from street level. Above-grade opportunities for graffiti deposition would be minimized by the use of open fencing along the corridor.

(2) There would not be "massive flood lighting over an extensive area," but rather area lighting directed down into the depressed trainway. Stray light is not anticipated.

4.7.13, Economics

(1) Site-specific impacts during the construction period cannot be estimated with certainty at this stage of project development. It will not be until much of the detailed construction sequence is known that these effects can be known and even then it may not be possible to predict the effects upon individual businesses. Every effort will be made to support local businesses during the construction process and localized dialogue and construction sequencing (to the subarea and perhaps even to the block level) will be conducted to that end.

(2) The DEIS acknowledges that the effect of relocation on businesses operating at sites with contaminated materials may be substantial and such businesses may not have the financial viability to withstand a project imposed relocation. The number, if any, cannot be determined until site specific studies are completed during the design phase.

(3) No right-of-way acquisition within the City of Compton is anticipated.

• 4.8, Secondary and Cumulative Effects

The reasonably foreseeable actions, as identified in EIS Section 4.8, are related to: (a) future consolidation efforts on the part of other agencies throughout the region, (b) the Ports Access Demonstration Projects, and (c) regional freight rail operations. The effects of proposed development at the ports are discussed in the *Deep Draft EIS* and other documents prepared by the ports.

14.7 Chapter 5: Comments and Coordination

(1) A record of the action taken by the ACTA Governing Board at its October, 1994 meeting can be obtained by contacting the ACTA office.

(2) The federal lead agencies have certified that the EIS has been undertaken in compliance with NEPA. Please see the responses to other similar comments.

(3) Technical information in support of the stated position has been provided at a number of times throughout the development of the proposed project. A record of this is provided on page 5-2 of the EIS. It is believed that sufficient justification has been presented in support of the findings made to date regarding the City's requested configuration.

14.8 Appendices

(1) Appendix C will be updated to reflect the appropriate parties who participated in the document preparation and review.

(2) Electromagnetic field (EMF) analysis was not necessary for the environmental document since there is no component of the proposed project which would result in EMF generation.

(3) The previously anticipated time frame has been exceeded, although adherence to such a time frame should have no bearing on the process other than ensuring its timeliness.

(4) The lead agencies have fully complied with the requested CO analysis.

(5) It is not required that the letter referred to in the comment be include verbatim in the EIS. It is believed that an accurate representation of the City's comments and positions have been incorporated into the environmental document, by virtue of the inclusion of this comment letter, and others.

CITY OF EL MONTE
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EL MONTE, CALIFORNIA 91731-3293
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March 8, 1995

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Regional Transportation
Planning & LARTS Branch

CITY COUNCIL
PATRICIA A. WALLACH, MAYOR
TOM MILLETT, VICE MAYOR
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JACK THURSTON

ADMIN. ASSISTANT/CITY COUNCIL
GRACE T. BLACK

Mr. Ronald Kosinski
Interim District Division Chief
CalTrans, District 7
120 South Spring Street
Los Angeles, California 90012

Re: **DRAFT ENVIRONMENTAL IMPACT STATEMENT**
ALAMEDA CORRIDOR PROJECT

Dear Mr. Kosinski:

The City of El Monte appreciates the opportunity to present comments on the above-referenced environmental document.

The Alameda Corridor project has the potential to create significant environmental impacts on a regional basis. These potential impacts, other than air quality, are not identified or discussed in the Draft Environmental Impact Statement(DEIS). As a result, their significance cannot be evaluated at this time.

It is our understanding that the Alameda Corridor project is intended to facilitate the movement of freight rail traffic between the Ports of Long Beach and Los Angeles and Downtown Los Angeles. There is no consideration of goods movement that would emanate from the Downtown Los Angeles terminus to outlying locations.

It can reasonably be expected that there will be significant increases in goods movement activity into outlying areas and specifically into and through the San Gabriel Valley.

The City of El Monte is located at the center of the San Gabriel Valley and the Southern Pacific Railroad El Paso mainline runs through the center of town.

Such impacts are, as a minimum, secondary or cumulative impacts resulting from the Alameda Corridor project and are worthy of consideration as part of this environmental analysis.

A Goods Movement Study of the San Gabriel Valley indicates that the increase in East-West freight trains may be of the order of 100-150 trains per day. Due to the high number of at-grade crossings in El Monte and the typical length and speed of freight trains, the amount of time that traffic will be delayed on the major arterials in the City of El Monte can be significant.

The potential impacts are very significant in terms of adverse air quality, worsened auto and truck congestion, noise, health safety, public safety and associated impacts. The San Gabriel Valley already suffers from poor air quality and various models predict major concerns about future mobility. Freight train blockages of major streets will, inhibit the delivery of emergency services such as police, fire and ambulance by delaying their access to victims and/or facilities. The exacerbation of these impacts as a direct result of implementation of the Alameda Corridor project should be examined at this time.

The busiest at grade crossing on the Southern Pacific mainline between Union Station and San Bernardino is Ramona Boulevard in the City of El Monte. El Monte is currently processing an application for funding a grade separation project at that crossing. The construction of this grade separation project on Ramona Boulevard will greatly reduce the impacts in the City of El Monte from the Alameda Corridor project.

The City of El Monte requests that these impacts be identified and responded to as part of the DEIS on this project. It should be noted that the City of El Monte does not oppose the development of the Alameda Corridor, but rather seeks to assure that its potential impacts on the City are identified, analyzed, discussed and properly mitigated.

Please do not hesitate to contact either Harold Johanson, Director of Community Development, or myself if we can provide further information on our concerns. We look forward to your response.

Sincerely,

PATRICIA A. WALLACH, MAYOR
City of El Monte

PAW/KT:bjk

cc: Gregory D. Korduner, City Administrator
Harold Johanson, Director of Comm. Dev
Juan D. Mireles, Asst. Director of Comm. Dev.
Kev Tcharkhoutian, City Engineer

RGSPWKT.L

City of El Monte

Please see the response to the San Gabriel Valley Council of Governments.

CITY OF LA VERNE
CITY HALL
3660 "D" Street, La Verne, California 91750

March 6, 1995

Mr. Ronald Kosinski
Interim District Division Chief
Caltrans, District 7
120 South Spring Street
Los Angeles, CA 90012

RE: **DRAFT ENVIRONMENTAL IMPACT STATEMENT**
ALAMEDA CORRIDOR PROJECT

Dear Mr. Kosinski:

The City of La Verne supports development of the Alameda Corridor, and appreciates the opportunity to present comments on the above-referenced environmental document. Our comments are reflective of the position taken by the San Gabriel Valley Council of Governments, which will be responding separately.

1. Potential Impacts. The Alameda Corridor project has the potential to create significant environmental impacts on a regional basis. These potential impacts, other than air quality, are not identified or discussed in the Draft Environmental Impact Statement (DEIS). As a result, their significance cannot be evaluated at this time.

2. Our Understanding. It is our understanding that the Alameda Corridor project is intended to facilitate the movement of freight rail traffic between the Ports of Long Beach and Los Angeles and Downtown Los Angeles. There is no consideration of goods movement that would emanate from the Downtown Los Angeles terminus to outlying locations, although we understand that a substantial amount of consolidation will occur along San Gabriel Valley rail lines to accommodate the changed transport patterns.

3. Cumulative Impacts. It can reasonably be expected that there will be significant increases in goods movement activity into outlying areas and specifically into an and through the San Gabriel Valley. Such impacts are, as a minimum, secondary

SISTER CITIES
Acambaro, Mexico
Etchmiadzin, Armenia

General Administration 909/596-8726 • Water Customer Service 909/596-8744 • Parks & Community Services 909/596-8700
Public Works 909/596-8741 • Finance 909/596-8716 • Planning 909/596-8706 • Building 909/596-8713
Fax 909/596-8737

or cumulative impacts resulting from the Alameda Corridor project and are worthy of consideration as part of this environmental analysis.

4. Public Safety. A Goods Movement Study by the Southern California Association of Governments (SCAG) indicates that the increase in east-west freight trains may be on the order of 100-15- trains per day. In our community, no grade separated crossings are available for any of the seven arterial and collector streets which cross our two rail lines. All of our city{s police, fire, and emergency management facilities lies on the north side of these lines, leading to potential impacts for public health, safety, and disaster management should these lines become sufficiently congested.

5. Air Quality, Noise, Congestion. If this is the case, the potential impacts are very significant in terms of adverse air quality, worsened auto and truck congestion, noise and associated impacts. The San Gabriel valley already suffers from poor air quality and various models raise major concerns about future mobility. The exacerbation of these impacts as a direct result of implementation of the Alameda Corridor project should be examined t this time.

6. Funding for Route 30. Finally, the City of La Verne also wishes to express its concern that the Alameda Corridor project not be constructed at the expense of completion of Route 30.

The City of La Verne requests that these impacts be identified and responded to as part of the DEIS on this project. Please do not hesitate to contact us at (909) 596-8706 for further information regarding our position.

Very truly yours,

Martin R. Lomeli
City Manager

cc: Congressman David Dreier
MTA Board of Directors
Mr. Franklin White, CEO, MTA
Mr. David Smith, SGVCOG
Mr. Steve Sizemore, SGVCOG/City of Duarte
Mr. Lawrence Stevens, SGVCOG/City of San Dimas
Mr. Steven A. Preston, AICP, Comm. Dev. Dir.

LTRSPM2

City Manager, City of La Verne

(1-5) Please see the response to the San Gabriel Valley Council of Governments.

(6) The Alameda Corridor is not competing for funds that would be used by the Route 30 project. For a discussion of the status of project funding please see section S.4 of this EIS.

CITY OF LONG BEACH

DEPARTMENT OF PUBLIC WORKS

333 WEST OCEAN BOULEVARD • LONG BEACH, CALIFORNIA 90802 • (310) 570-6383

March 10, 1995

Mr. Ronald Kosinski
Interim District Division Chief
Caltrans, District 7
120 S. Spring Street
Los Angeles, CA 90012-3606

Dear Mr. Kosinski

The Transportation Planning Division has reviewed the Draft Environmental Impact Statement(DEIS) for the Alameda Corridor Project.

The DEIS adequately addresses the environmental issues and concerns of the City. We can not emphasize strongly enough the negative impacts of no action within the corridor. With the continued expansion of port activities and the ever growing world economy, congestion on those roadways that serve the Port area will likely result in significant spill over congestion on both the Long Beach and the Harbor Freeways. The impacts of this congestion will be evident in both air quality and in regional and local area competitiveness.

Thank you for the opportunity to address the DEIS. We look forward to continuing as part of the EIR/EIS process.

Sincerely,

Tim Lee

Timothy Lee
Transportation Engineering Associate

TL/tl

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City of Long Beach

The City's support for the project is appreciated and acknowledged for the record.

CITY OF LOS ANGELES
CALIFORNIA

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485-6032

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DONALD O. MANNING
CHIEF ENGINEER
AND
GENERAL MANAGER

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MAR 21 1995
ENV PLAN SEC.

March 13, 1995

Mr. Ronald Kosinski
Interim District Division Chief
Caltrans, District 7
120 South Spring Street
Los Angeles, CA 90012

Dear Mr. Kosinski:

Alameda Corridor - Environmental Impact Report

The project is described as the improvement of existing rail right-of-way, which will originate in the Port of Long Beach and will terminate in the downtown area of Los Angeles at Alameda Street and the I-10 interchange (Santa Monica Freeway).

The project consists of the proposed development and construction improvements to the existing Southern Pacific's San Pedro Branch right-of-way; thus, creating the Alameda Corridor. The corridor will be approximately 20 miles in length; primarily running along Alameda Street and extending through and contiguous with the cities of Vernon, Huntington Park, South Gate, Lynwood, Compton, Carson, Los Angeles, and the County of Los Angeles.

The following comments are furnished in response to your request for this Department to review the proposed development:

A. Fire-Flow

- The adequacy of fire protection for a given area is based on required fire-flow, response distance from existing fire stations, and this Department's judgment for needs in the area. In general, the required fire-flow is closely related to land use. (1)

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The quantity of water necessary for fire protection varies with the type of development, life hazard, occupancy, and the degree of fire hazard.

Fire-flow requirements vary from 6,000 - 9,000 gallons per minute (G.P.M.) in industrial and commercial areas to 12,000 G.P.M. in high-density commercial or industrial areas. A minimum residual water pressure of 20 pounds per square inch (P.S.I.) is to remain in the water system, with the required gallons per minute flowing. (1)

- Improvements to the water system in this area may be required to provide the required fire-flow. The cost of improving the water system may be charged to the developer. For more detailed information regarding water main improvements, the developer shall contact the Water Services Section of the Department of Water and Power.

B. Environmental/Adverse Impact

- The project as proposed could result in an increase in traffic congestion, which could result in potential delays in emergency services, along the Alameda Street Corridor. These delays would impact emergency medical and fire protection services, within the City of Los Angeles and bordering communities on a mutual aid basis.

C. Mitigation Measures

The following measure will reduce the adverse impact to an acceptable level:

- The L.A.F.D. supports any and all project alternatives which will provide the least amount of traffic congestion and potential delays. (2)

- In addition, mitigating measures indicated for the following would further aid in reducing the averse impact to an acceptable level:

Firefighting Personnel Access

- During demolition the Fire Department access will remain clear and unobstructed.

- The Operation Control Section of the Fire Department shall be notified prior to any project that would affect Fire Department access; in order to allow Fire Suppression and Emergency Medical Services to plan alternative routes or to develop contingencies plans. Notification is to be made by calling the Operations Control Dispatch Section at (213) 485-6185. (2)

CONCLUSION

The Los Angeles Fire Department continually evaluates fire station placement and overall Department services for the entire City, as well as specific areas. The development of this proposed project, along with other approved and planned projects in the immediate area, may result in the need for the following: (3)

1. Increased staffing for existing facilities.
2. Additional fire protection facilities.
3. Relocation of present fire protection facilities.

For additional information, please contact the Hydrant Unit, at (213) 485-5964.

DONALD O. MANNING
Chief Engineer and General Manager

Dal L. Howard, Assistant Fire Marshal
Bureau of Fire Prevention and Public Safety

DLH:TW:lq:alameda.wp

cc: Councilman Mike Hernandez, First Council District
Councilwoman Rita Walters, Ninth Council District
Councilman Richard Alatorre, Fourteenth Council District
Environmental Affairs Commission

City of Los Angeles Fire Department

(1) The project will not change the functional use of the existing land area nor construct any buildings intended for occupancy. Consideration will be given to providing a water main and hydrants within the trench section during the final design. Existing water lines affected by the construction will be protected and/or relocated in coordination with the local water agency.

(2) See response to LAUSD comment 2.

(3) It is not anticipated that implementation of the proposed project would require the first and third measures discussed in the comment. The second measure has been recognized as a potential necessity and this will continue to be addressed as the project proceeds further into subsequent stages of design.

CITY OF LOS ANGELES
CALIFORNIA

CITY PLANNING COMMISSION

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ROBERT L. SCOTT
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MARNA SCHNABEL
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RAMONA HARO
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(213) 485-5071

MAR 27 1995

RICHARD J. RIORDAN
MAYOR

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DEPARTMENT OF
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March 13, 1995

Ronald J. Kosinski
Caltrans District #7
120 South Spring Street
Los Angeles, Ca 90012

RE: ALAMEDA CORRIDOR DRAFT ENVIRONMENTAL IMPACT REPORT

Project Description

The Alameda Corridor project is a twenty mile long railroad system between Downtown Los Angeles and the ports of Los Angeles and Long Beach. The project, which traverses several Cities and a portion of Los Angeles County, is a rail and highway enterprise designed to line the ports with the national rail system and thus speed the shipment of port cargo. As part of the project, the Alameda Corridor Task Force has received federal funding for highway improvements to keep trains from coming into conflict with automobile traffic.

Land Use

Within the city of Los Angeles, the Alameda Corridor Project intersects the Southeast Community Plan, the Wilmington-Harbor City Community Plan, and the Port of Los Angeles Plan.

Properties adjacent to the Corridor in Southeast Los Angeles are planned industrial and zoned M2 and M3. The project is consistent with the objectives of the Southeast los Angeles Plan in that the proposed project would focus and improve rail transportation in a particular alignment within the community. It would provide an opportunity to "revitalize land uses in conjunction with transportation improvements". (1)

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Properties adjacent to the corridor in Wilmington-Harbor City and the Port of Los Angeles are planned industrial. The project is consistent with the objectives of the Wilmington-Harbor City Plan in that the proposed project will improve rail transport between Wilmington and the Port of Los Angeles by completing a number of highway improvements. Objectives of the Wilmington-Harbor City Plan include "To coordinate the development of Wilmington and Harbor City with adjacent jurisdictions, the Ports of Los Angeles and Long Beach, and other parts of the region"; "To improve the safety and efficiency of all transportation modes"; "To promote improved design and appearance of transportation facilities and corridors"; and "To minimize conflicts between vehicular, pedestrian, railroad and harbor-oriented industrial traffic, and daily or commuter traffic patterns within the District". (1)

The project is consistent with the Goals of the Port of Los Angeles Plan to increase the efficiency of land transportation systems.

Transportation

There are three streets providing access from Wilmington-Harbor City to the City of Long Beach. These are Anaheim Street, Pacific Coast Highway and Ocean Boulevard. Two of these three, Anaheim Street and Ocean Boulevard, are scheduled for highway improvements. The DEIR needs to more clearly identify how traffic congestion will be mitigated to assure adequate access between Long Beach and Wilmington during the construction phase of the project. (2)

It is a policy of the Wilmington-Harbor City Plan to divert truck traffic from the residential neighborhoods as much as possible. Currently, many industrial properties fronting on Lomita Boulevard use an informal access road to gain admittance to their sites. With the increased train traffic which will occur once the project is completed this access road will no longer be safe for vehicular traffic, thus, it is important that Lomita Boulevard be completed to connect with Alameda Street with the City of Los Angeles, the Carson City, and the Alameda Corridor Task Force contributing their fair share of the cost. (3)

The Southeast Los Angeles Community Plan describes a policy in "Corridors of high transportation activity to upgrade and improve the circulation system. It is a policy of the Southeast Los Angeles plan to, also, reduce and discourage through traffic in residential areas."

Aesthetics

Sound walls adjacent to the Alameda Corridor Project should be planted with vines which are native to the region, water conservative, and which require little maintenance. Landscaping the walls will mitigate the threat of graffiti, be more aesthetic pleasing, absorb additional noise, and contribute to the process of oxygen regeneration. (4)

Air Quality

Physical conditions affect the quality of life within the southeast Los Angeles Community Plan area. The proposed project would traverse an area where residential development might be impacted. Residential development occurs in relative close proximity to the proposed Alameda Corridor south of 51st Street. While the project would improve overall regional air quality, what would be the local impact on such areas? (5)

Noise

Both the build and no build option have impacts. With the project, the impact statement says "potential noise impacts" will occur on eight residences and two community facilities even with the construction of noise barriers. How will this be resolved? (6)

Please indicate how these issues will be addressed.

Yours truly,

Herbert Glasgow
City Planner,
South Los Angeles Unit

HG:jj

City of Los Angeles Planning Department

(1) The noted consistency of the proposed project with the City's community plans is acknowledged for the record.

(2) In addition to the Anaheim Street and Ocean Boulevard projects noted, Pacific Coast Highway is scheduled for improvements at the Alameda Corridor with Caltrans as the lead agency. (See response to Texaco comment.) The City of Los Angeles is the lead agency for the Anaheim Street Project. Ocean Boulevard is outside the area of influence for the Alameda Corridor. As a part of the final design, detailed traffic management plans will be developed to minimize impacts to local access and circulation during construction. Completion of the Corridor and the related highway improvement projects should result in greatly improved circulation in the area.

(3) See response to Watson Land Company comment 1.

(4) Provisions for landscaping and soundwall treatments will be considered during the final design phase.

(5) The local air quality impacts associated with the proposed project are exemplified by the data displayed in EIS Tables 4-5 through 4-8. As is noted in these tables, the proposed project is not expected to have an adverse effect on local carbon monoxide concentrations.

(6) The comment correctly identifies that even with construction of noise barriers, noise impact is projected for eight residences and two community facilities. Although noise barriers for these locations are not reasonable and/or feasible, other mitigation approaches should be explored during project design, such as improved sound insulation (as discussed in Section 4.4.6 of the FEIR) or improving the sound attenuation of the trench.

CITY OF LOS ANGELES
CALIFORNIA

ROBERT R. YATES
GENERAL MANAGER

DEPARTMENT OF
TRANSPORTATION
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RICHARD J. RIORDAN
MAYOR

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March 10, 1995

Mr. Ronald Kosinski
Interim District Division Chief
Caltrans, District 7
120 South Spring Street
Los Angeles, California 90012

DRAFT ENVIRONMENTAL IMPACT STATEMENT
ALAMEDA CORRIDOR

The Transportation Studies Division (TSD) of the Department of Transportation (LADOT), has completed its review of the *Draft Environmental Impact Statement (EIS) for the Alameda Corridor*. Below are our comments relating to the Traffic and Circulation Section in the EIS:

1) Paragraph 2 under Section 4.4.9.2 states that "Because Alameda Street would be reconstructed generally in its existing configuration, it **would not attract additional traffic** ...". However, Section 5.4.4 (Intersection Analysis (Future Conditions)) of the *Environmental Impact Report (EIR) (approved in January 1993)* for this project stated that higher v/c ratios for intersections in the project area are the result of "... vehicles **attracted to** the Corridor by the improvements ...".

2) Paragraph 7 under Section 4.7.9.2 states that the project will not require permanent modifications to transit. However, Section 5.4.10 in the EIR is a complete analysis of **Transit Impacts** which includes projections for Route Relocation, Route Modification, and Bus Stop Relocations.

3) Paragraph 6 under Section 4.7.9.2 states that no parking would be removed or added as a result of the project. However Section 5.4.9 in the EIR provided two tables that listed numbers of on-street and off-street parking spaces by segments within the Corridor that would be subject for removal under several analyzed alternatives.

4) The EIS does not discuss potential pedestrian and bicycle impacts along the Corridor as a result of this project. Section 5.4.8 in the EIR analyzed these potential impacts created by the project.

5) Section 4.7.9.1 (**No Build Alternative**) cross-references Section 5.4 of the EIR regarding description of traffic conditions in 2010 and 2020 without the project.

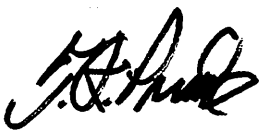
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Section 5.4 included analyses of three other alternatives in addition to "No Build" alternative. It would be more appropriate that Section 5.4.3 (**Regional Effects**) of the EIR be referenced.

6) Figure 2.8, Sheet 1 of 9 (Segment A) shows an alternative connection between the Corridor tracks and the ATSF main tracks, and page 2-27 briefly discusses this alternative connection. However, the EIR did not show this connection in all its Segment A figures nor provide any discussion about it. If this alternative is seriously being considered, additional analysis regarding its impacts to the surrounding environment is needed.

7) The EIS did not analyze the proposed rail track realignment in the northeastern end of the project and the proposed realignment of a segment of Washington Boulevard between Santa Fe Avenue and the Los Angeles River.

If you have any questions regarding these comments, please contact Benjamin K. Chan at (213) 237-0645.



T.K. Prime
Senior Transportation Engineer

egjr:a:\drfteis.wp

City of Los Angeles, Department of Transportation

(1) The reference in the Draft EIR document to higher v/c ratios resulting from the attraction of improved facilities refers to Alternative 1 and 2.1A which would widen Alameda Street to six lanes. The locally preferred Alternative 2.1B maintains Alameda Street in its current four lane configuration with turn lanes added at intersections. This configuration was recommended to minimize additional right-of-way requirements and other impacts. Since Alameda Street would be reconstructed within its existing configuration, the project is not expected to attract additional traffic to the Corridor above the No Build alternative.

(2) The EIR identified several effects associated with public transit that would occur under one or more alternatives. Of these, Alternative 1.0 would result in all but one impact. Alternative 1.0 is not identified as the locally preferred alternative, and therefore these effects are not anticipated. Alternative 2.1A would have resulted in the necessity to reroute RTD Line 107; however, the locally preferred alternative (2.1B) has restored the crossing on 55th Street, and therefore this impact would no longer occur. The EIS statement regarding impacts to public transit are therefore correct.

(3) The Locally Preferred Alternative (2.1B) would require far less right-of-way acquisition than alternative 2.1A. With no right-of-way takings from 25th Street south to SR 91 and further assuming that right-of-way takings would be roughly equal in terms of parking impacts at the north and south ends of the projects, the expected effects in parking would correspond to the entries in EIR Tables 5-35 and 5-36, under Alternative 2.1A for segments A and D. These effects include an estimated loss of 175 on-street parking spaces and an estimated loss of 568 off-street parking space. It is likely that the actual final losses in parking spaces would be less than these numbers.

(4) The proposed project, as defined by Alternative 2.1B, would require pedestrians to negotiate street crossings at designated crosswalks, similar to existing conditions throughout the city. No new conditions would be introduced by the project which would be hazardous to pedestrians. No bicycle paths currently exist along or across the Corridor. The effects on both pedestrians and bicyclists would therefore, not be adverse.

(5) Section 5.4.3 is, as noted in the comment, a more precise reference.

(6) An alternative connection between the Corridor tracks and ATSF tracks is under consideration, along with several concepts to facilitate the passenger/freight rail grade separation in the vicinity of Redondo Junction, in response to certain provisions of the railroad purchase and operating agreements that have been approved. No decisions have been made in this regard, however.

The alternative railroad connection noted in the comment was surveyed in the field and was judged to have essentially the same effects (primarily associated with property acquisition and traffic) as the concept level project description which was presented in the EIR and the current EIS. No additional significant impacts were found with this potential alternative routing option.

The details of alternative rail routing in this vicinity, including the passenger/freight grade separation, when they are formally developed and agreed to by the affected parties, will be examined for their environmental effects and, if necessary, additional documentation will be provided. At the present time, however, the concepts being considered are deemed to be within the bounds of the concept engineering descriptions which have been provided in the EIR and EIS.

(7) Please see the response to comment 6 above. Washington Boulevard is currently planned for reconstruction in the same fashion as has been previously discussed in the EIR.

City of LYNWOOD
A City Meeting Challenges
11330 BULLIS ROAD
LYNWOOD, CALIFORNIA 90262
(310) 603-0220

March 7, 1995

Mr. Ronald Kosinski
Interim District Division Chief
Caltrans, District 7
120 South Spring Street
Los Angeles, Ca 90012

SUBJECT: DRAFT ENVIRONMENTAL IMPACT STATEMENT (DEIS)
THE ALAMEDA CORRIDOR PROJECT

Dear Mr. Kosinski:

Presented herein are comments of the City of Lynwood on the Draft Environmental Impact statement for the Alameda Corridor Project.

1. At grade highway bridge overcrossings in Lynwood

In the report, there are four at grade highway bridge crossings proposed in the City of Lynwood: Martin Luther King Jr. Boulevard, Fernwood Avenue/Santa Ana Boulevard, Imperial Highway and Lynwood Road. As you are aware that an important link between Industrial Park west of Alameda Street and eastern portion of the City is through Industry Way. It is, therefore, our request that a bridge be provided through Industry Way/Butler Avenue intersection for this project. Two additional bridge crossings should also be considered are: 103rd. Street and in front of Lynwood Justice Center for reason of better circulation and meeting emergency needs.

2. Ramp connection to I-105

In Fig S-4, page S-17 and Fig 2-8, page 2-31 of the report the ramp connection to I-105 at Imperial Highway is shown to be done by others. No further description can be found in the report. It is our opinion that on and off ramps at Alameda street/Imperial Highway are part of the mitigation of the Alameda Corridor Project. The ramps would reduce impacts on traffic conditions at the intersection of Alameda Street /Imperial Highway and improve emergency responses of Sheriff's Department and Fire Department. Without ramps at Alameda Street, North &

South traffic on Alameda Street have either to turn east and take Imperial Highway to Long Beach Boulevard on and off ramps or turn west to Wilmington Avenue on and off ramps. Level of service at the intersection is F and can't be effectively improved without the ramps.

3. Parking and sidewalk along Alameda Street

In Fig. 2-9, page 2-39 typical sections are shown for various segments. No indication of parking lane and sidewalk improvements provided. Economic considerations for the project are supposed to promote economic development near and along the Alameda Corridor and sustain economic growth. Therefore, it is our opinion that at least parking lane and sidewalk improvements along eastside of Alameda Street should be considered .

4. Fire service and water system

In order to adequately provide fire flow to the project area two sources of water supply should be considered:

1. Reclaimed Water

   Currently reclaimed water main runs along Wright Road in the City of Lynwood. Branching out from Wright Road and construction of reclaimed water main along Fernwood Avenue to the project area for construction water use and future fire services should be considered.

2. Lynwood Water System

   City's Well #19 is located at Industry Way west of Alameda Street. To provide proper fire water service, aside from relocation of our water system due to the project, water main needs to be upgraded from Butler Avenue to Imperial Highway along Alameda Street for adequate water pressure and an emergency generator should be provided for the well.

5. Mitigation on air pollution

According to California South Coast Air Quality Management District Lynwood has exceeded most frequently State Carbon Monoxide Standard and has highest monthly average lead concentration in the State. Based on reports that trees can effectively reduce pollution we are therefore, requesting that trees be planted along both sides of Alameda Street and along the 1000 foot neighborhood buffer area along both sides of the corridor. The proposed median island should be landscaped and rail electrification should also be considered to reduce air pollutions and air toxins.

6. Master Impact study and Improvements

Trenching along the Alameda Street will require relocation of City's storm drain, sewers, water and other utilities. A Master Impact Study on all the above-affected structures is a must. Recommended improvements from the study should be implemented. Additional street lightings along the Alameda Street seems necessary.

7. Economic benefits of the Corridor

A well planned training and hiring program is needed to accomplish construction employment and related expenditures program beneficial to the corridor communities.

In summary, we are supporting alternative 2.1B with our above mentioned comments. The City would like to make it clear that all future liabilities relative to rail operations in the corridor area will continue to be the responsibility of the railroad companies.

If you should have any questions, I can be reached at (310) 603-0220 ext. 287.

Sincerely,

Emilio M. Murga
Director of Public Works

Joseph Y. Wang
City Engineer

v80-025

City of Lynwood

(1) All existing grade crossings within the City of Lynwood will be replaced with at-grade highway bridge structures over the depressed trainway. There is no crossing of the existing San Pedro Branch at Industrial Way. Crossings at additional locations are beyond the scope of the Alameda Corridor Project.

(2) The Alameda Street ramps at I-105 are shown as a related project and to confirm that the Alameda Corridor Project does not preclude or limit the future construction of the I-105 ramps by Caltrans. Caltrans is under a Federal Consent Decree prohibiting consideration of additional interchanges at this time.

(3) The intent of the Locally Preferred Alternative 2.1B is to maintain Alameda Street within its existing cross section to avoid additional right-of-way acquisition. Widening for parking lanes would require additional right-of-way. In addition, sidewalks and parking lanes are not recommended along the east side of Alameda Street since it would encourage dangerous mid-block pedestrian crossings of a four-lane busy arterial street without crossing protections.

(4) Relocation of utilities affected by the corridor construction will be coordinated with the appropriate agency or utility operator. Water availability for construction purposes will be determined during the final design phase. The Alameda Corridor will not impose unusual or increased requirements for fire protection.

(5) The commentor notes that Lynwood has most frequently exceeded the California Ambient Air Quality Standard for CO and has the highest monthly average lead concentration in the state. The commentor suggests that tree planting along Alameda Street may be an effective mitigation measure to reduce air pollutants.

First, Tables 4-5, 4-6, 4-7, and 4-8 in the EIS show that estimated CO concentrations resulting from the proposed project would be less than or the same as predicted concentrations under the No Project scenario. At the two modeled intersections closest to Lynwood (Alameda at Tweedy and Alameda at Santa Ana Blvd), estimated CO concentrations were less than those for the No Project alternative. In addition, estimated CO concentrations at these two locations are below the state 1-hour standard and the federal and state 8-hour standard. Lead is no longer used in gasoline or other fuels, therefore, the proposed project is not expected to increase lead levels. Therefore, mitigation measures for CO and lead are not required. Secondly, trees are not believed to significantly affect atmospheric concentrations of CO or lead because they do not uptake these substances directly.

(6) It is recognized that existing utilities in many city streets crossing the Alameda Corridor may be subject to relocation or temporary interruption during construction of the proposed project. The details associated with these utilities will be developed during

subsequent stages of design. It is not anticipated that any long-term adverse effects on local utilities will occur as a result of the project. Street lighting requirements along Alameda Street will be determined in accordance with applicable lighting standards and implementation arrangements will be established with each of the affected jurisdictions.

(7) The Alameda Corridor will provide opportunities for jobs and job training. A substantial number of direct construction jobs will be generated, as well as a substantial number of additional jobs being potentially created in order to supply materials for Alameda Corridor construction. ACTA plans to work with job training providers and other interested organizations to ensure that the program achieves the economic and community development goals established for the project.

Responsibility for operation and maintenance of the San Pedro Branch remains with the Southern Pacific Transportation Company until construction of the corridor commences. Responsibility for safe rail operations in the corridor will be the responsibility of the operating railroads. ACTA will be responsible for the maintenance of the rail corridor.

City of MONROVIA

1887

Office of the City Manager

March 7, 1995

Mr. Ronald Kosinski
Interim District Division Chief
CalTrans, District 7
120 South Spring Street
Los Angeles, CA 90012

RE: Draft Environmental Impact Statement
Alameda Corridor Project

Dear Mr. Kosinski:

The City of Monrovia appreciates the opportunity to present comments on the above-reference environmental document. The City of Mornvoia agrees with the San Gabriel Valley Council of Governments (SGVCOG) in their March 3, 1995 letter addressed to your attention. I'll reiterate the points they made.

The Alameda Corridor project has the potential to create significant environmental impacts on a regional basis. These potential impacts, other than air quality, are not identified or discussed in the Draft Environmental Impact Statement (DEIS). As a result, their significance cannot be evaluated at this time.

The Alameda Corridor project is intended to facilitate the movement of freight rail traffic between the Ports of Long Beach and Los Angeles and Downtown Los Angeles, yet there is no consideration of goods movement that will emanate from the Downtown Los Angeles terminus to outlying problems. It can reasonably be expected that there will be significant increases in goods movement activity into outlying areas and specifically into and through the San Gabriel Valley. Such impacts are, as a minimum, secondary or cumulative impacts resulting from the Alameda Corridor project and are worthy of consideration as part of this environmental analysis.

A Goods Movement Study by the Southern California Association of Governments (SCAG) indicates that the increase in east-west freight trains may be on the order of 100-150 trains

415 South Ivy Avenue Monrovia, California 91016-2888 (818) 359-3231

per day. Due to the high number of at-grade crossings in the San Gabriel Valley and the typical length and speed of freight trains, the amount of time that north-south traffic will be delayed on the two major freight routes in the Valley can be significant.

If this is accurate, the potential impacts are very significant in terms of adverse air quality, worsened auto and truck congestion, noise, health safety, public safety and associated impacts. The San Gabriel Valley already suffers from poor air quality and various models predict major concerns about future mobility. Freight train blockages of major north-south streets will, in many of the cities, inhibit the delivery of emergency services such as police, fire and ambulance by delaying their access to victims and/or facilities. The exacerbation of these impacts as a direct result of implementation of the Alameda Corridor project should be examined at this time.

The San Gabriel Valley Council of Governments has requested that these impacts be identified and responded to as part of the DEIS on this project and the City of Monrovia agrees. It should be noted that the City of Monrovia does not oppose the development of the Alameda Corridor, but rather seeks to assure that its potential impacts on the San Gabriel Valley are identified, analyzed, discussed and properly mitigated.

Please do not hesitate to contact me if you have further questions.

Sincerely,

Rod Gould
City Manager

RG:AGG:fr

aggl/kosinski.ltr

cc: David Smith, SGVCOG Executive Director

City Manager, City of Monrovia

Please see the response to the San Gabriel Valley Council of Governments.

CITY OF MONTEREY PARK
320 west newmark avenue • monterey park, california 91754
• municipal services center

March 13, 1995

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MAR 14 1995
ENVIRONMENTAL

Mr. Ronald Kosinski
Interim District Division Chief
Caltrans, District 7
120 South Spring Street
Los Angeles, CA 90012

RE: COMMENTS ON DRAFT ENVIRONMENTAL IMPACT STATEMENT (DEIS) - ALAMEDA CORRIDOR

Dear Mr. Kosinski:

The City of Monterey Park Community Development Department appreciates the opportunity to provide written comments on the subject matter. Although the jurisdictional limits of Monterey Park are adequately removed from the project corridor, our community's cooperation with the San Gabriel Valley Council of Governments (SGVCOG) prompts this department's correspondence stating concurrence with the SGVCOG's letter of March 3, 1995.

The realizable processes that will be undertaken in order to establish the Alameda Corridor will be both challenging and exciting. The concept of a rail-truck expressway transversing the County to connect the San Pedro Bay Ports and Downtown Los Angeles offers an opportunity to develop solutions to regional concerns of slacking economies and surface transportational "nightmares".

The implementation of the Alameda Corridor project will in no doubt influence areas beyond the Downtown Los Angeles nucleus.

Accordingly, this letter serves to reiterate the issues raised by the SGVCOG regarding impacts due to detained vehicular circulation that can have an effect on public safety and compounded adverse air quality levels in the San Gabriel Valley. Your environmental analysis to review and evaluate project impacts to outlying areas, especially within Los Angeles and San Bernardino Counties, will be appropriate.

Again, thank you for your staff's assistance on this matter, and the City looks forward to your continued attention to the project.

Sincerely,

Ray Hamada
Senior Planner

RH:go

c: Chris Jeffers, City Manager
Adolfo C. Reta, Community Development Director
David Smith, SGVCOG
Mark Pisano, SCAG

City of Monterey Park

Please see the response to the San Gabriel Valley Council of Governments.

City of San Gabriel

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FEB 25 1995
ENV. PLAN. BR.

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FEB 15 1995
Regional Transportation
Planning & LARTS Branch

◆ City With A Mission ◆ Founded 1771 ◆
John E. Nowak, Deputy City Administrator ◆ 818-308-2808

February 9, 1995

Ronald J. Kosinski
Caltrans District 7
120 S. Spring Street
Los Angeles, CA 90012

Dear Mr. Kosinski:

The City of San Gabriel is pleased to offer the following comments to the Alameda Corridor Project Draft Environmental Impact Statement.

1. The report does not address increases in freight traffic in the East West directions of the San Gabriel Valley, specifically along the Southern Pacific Alhambra Line.

2. The City of San Gabriel is concerned about a possible increase in number of trains daily through our city. Possible negative impact may result in the following areas:

   a. At the five major at grade intersections (Mission Drive, Del Mar Avenue, San Gabriel Blvd., Ramona Street, and Walnut Grove) resulting in traffic delays on major N/S corridors

   b. At or nearby two high schools along the tracks with students attempting to "beat the train"

   c. A decrease in ambulance and police service within the city with tracks bisecting the city resulting in response delays

   d. An increase in noise levels will result

   e. Automobile air pollution will increase due to increased idling time at railroad crossings

   f. Separation of a large portion of the City from emergency medical treatment during train travel

The City feels the DEIS is incomplete in that it fails to address these matters and similar conditions which will result from the Alameda project in the San Gabriel Valley.

Thank you for your attention in these matters.

Sincerely,

John E. Nowak
Deputy City Administrator

City of San Gabriel

Please see the response to the San Gabriel Valley Council of Governments.

City of San Gabriel

◆ City With A Mission ◆ Founded 1771 ◆

P. Michael Paules, City Administrator ◆ 818-308-2802

March 9, 1995

Mr. Ronald Kosinski
Interim District Division Chief
CalTrans, District 7
120 South Spring Street
Los Angeles, CA 90012

Re: Draft Environmental Impact Statement - Alameda Corridor Project

Dear Mr. Kosinski:

The City of San Gabriel hereby requests that the Environmental Impact Statement being prepared for the Alameda Corridor Project address the impacts of additional east/west freight train activity in the San Gabriel Valley which will be generated by the project. We also request that the EIS include effective strategies to mitigate these impacts.

The following impacts should be given particular consideration: increased traffic congestion, emergency service response delays, noise, air quality, public health and safety impacts.

The Southern Pacific Railroad's Alhambra line currently has four unseparated crossings within our community which produce significant traffic delays given the frequent freight rail activity on this line. The additional trains to be generated by the Alameda Corridor will cause severe environmental damage to our community and region unless these impacts are anticipated and properly mitigated.

Sincerely,

P. MICHAEL PAULES
City Administrator

RECEIVED
MAR 15 1995
Regional Transportation
Planning & LARTS Branch

City of San Gabriel

(1) Secondary and cumulative impacts associated with the Alameda Corridor are discussed in Section 4.8 of the EIS. Insofar as increased freight rail movements are concerned eastward of downtown Los Angeles (including through the San Gabriel Valley, the magnitude of these increases will be determined by economic conditions on both global and national scales, and not as a direct result of the proposed project. These increased freight rail movements will occur both within the study area of the Alameda Corridor and also in other areas to the north and east of the downtown rail yards. Overall freight rail traffic will increase in the region in proportion to the economic growth that will attract it to the west coast of the United States, and the allocation of rail movements among the three railroads in Southern California and among the railroad's various main lines will be determined by market conditions and individual decisions on the part of the railroads themselves. SCAG is managing a study to determine the best way of moving rail traffic eastward through Southern California, including the potential for additional consolidated routes along one or more lines. The results of this effort will determine future regional policy on this issue. Please also see the response to the San Gabriel Valley Council of Governments, Comment 2.

(2) The SCAG regional rail consolidation study will address freight rail routing decisions which relate more directly to the effects noted in the comment.

NATIONWIDE
ALL AMERICA CITY
AWARD WINNER

CITY OF SANTA FE SPRINGS

11710 TELEGRAPH ROAD, 90670-3658 - P.O. BOX 2120 - (310) 868-0511 - FAX (310) 868-7112

February 21, 1995

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ENV. PLAN. BR.

Ronald Kosinski
Interim District Division Chief
Caltrans, District 7
120 South Spring Street
Los Angeles, CA 90012

Subject: Alameda Corridor DEIS

Dear Mr. Kosinski:

In reviewing the subject document there is no mention on what the impacts will be to the local agencies which surround the Alameda Corridor during the construction phase of the project. Will trains be rerouted through the Santa Fe Springs, Norwalk, and Downey areas while the corridor is under construction? If so, how many trains daily will be rerouted? Will these trains travel through the area at night or during the day?

Motorists traveling through Santa Fe Springs are already greatly delayed and inconvenienced by the long, slow trains carrying containers which regularly block several of our grade crossings during the weekdays. The impact of these long, slow trains is to create gridlock and traffic queues which can easily reach a 1 mile long. The impact of routing additional "container" trains through Santa Fe Springs will have a significant impact on traffic operations in our area. We feel that if trains are to be rerouted through Santa Fe Springs during the construction of the Alameda Corridor, the impacts of these trains should be documented in the EIR or DEIS.

Very truly yours,

John R. Price
Director of Public Works

JRP/trl/tc

Albert L. Sharp, *Mayor* • Betty Wilson, *Mayor Pro-Tempore*
City Council
Mercedes A. Diaz • Ronald S. Kernes • George Minnehan
City Manager
Don Powell

City of Santa Fe Springs

During construction of the Corridor, the rail carriers will continue to operate on their own lines respectively. The Construction and Maintenance Agreement negotiated in December 1994 with the Southern Pacific requires that the San Pedro Branch (Alameda Street) remain operational until improvements are completed which permit the railroad greater operational flexibility. Selection of specific routings for trains is at the discretion of the railroad, however any temporary closing of the San Pedro Branch during construction will limit access to the Santa Ana Branch possibly reducing trains through Santa Fe Springs, Norwalk and Downey during construction.

CITY COUNCIL
LEONIS C. MALBURG
Mayor
THOMAS A. YBARRA
Mayor Pro-Tem
Wm. "BILL" DAVIS
Councilman
H. "LARRY" GONZALES
Councilman
W. MICHAEL McCORMICK
Councilman

BRUCE V. MALKENHORST
City Administrator/City Clerk
FAX: (213) 581-7924

CITY HALL

4305 SANTA FE AVENUE, VERNON, CALIFORNIA 90058
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DAVE TELFORD
Fire Chief
FAX: (213) 581-1385
LOUIS ROSENKRANTZ
Police Chief
FAX: (213) 581-1178

In Reply Refer to:

March 8, 1995

Mr. Ronald J. Kosinski, Chief
Environmental Planning Branch
CALTRANS District 7
120 South Spring Street
Los Angeles, California 90012-3606

Mr. Gill Hicks, General Manager
Alameda Corridor Transportation Authority
6550 Miles Avenue, Room 113
Huntington Park, California 90255

Re: Alameda Corridor Draft Environmental Impact Statement

Dear Messrs. Kosinski and Hicks:

The City of Vernon, which borders the proposed Alameda Corridor Project, has reviewed the Draft Environmental Impact Statement ("DEIS") for the Alameda Corridor Project. We appreciate the opportunity to provide comments and to ensure that all pertinent factors are considered in drafting the Final Environmental Impact Statement ("the EIS") for this project. The City of Vernon's comments and concerns are stated below:

1. As previously indicated in comments related to the scoping for the EIS, the City of Vernon believes that two significant issues must be addressed by the EIS: (1) the fundamental issue that the project exists to mitigate significant adverse impacts caused by the growth and expansion of the Port of Los Angeles and the Port of Long Beach ("the Ports"), (2) the issue that the portion of the Alameda Corridor between State Route 91 and 25th Street must be designed and constructed as a depressed trainway to mitigate the adverse impacts caused by the operation of the Alameda Corridor.

2. The DEIS states that the City of Vernon's position that the project exists to mitigate the substantial adverse impacts caused by the growth of the Ports remains a point of controversy to the City of

Vernon and other local jurisdictions along the Corridor. §S.6. Nevertheless, the DEIS acknowledges that by the year 2020, the Ports are expected to expand significantly and that utilization of existing unimproved corridors will result in impairment of rail and street traffic flow, increase in noise and air polluting emissions. §S.2. The DEIS also recognizes that the project is necessary to accommodate the anticipated growth of the Ports. Id; §§1.1; 1.4. The City of Vernon agrees with these comments and believes that they support the fundamental conclusion that the project is necessary as mitigation for the growth and expansion of the Ports. Therefore, the EIS should make it clear that the major beneficiaries of the Project are the Ports.

3. Although the DEIS indicates that the Alameda Corridor Project will have the effect of reducing highway traffic congestion and vehicle delays at grade crossings, the DEIS does not adequately discuss whether or not the expansion of the Ports will result in an increase truck traffic out of the Ports and whether or not the Alameda Corridor Project will mitigate such increased traffic. If the Alameda Corridor Project does not have the effect of mitigating increased truck traffic due to the expansion of the Ports, the City of Vernon believes that this issue should be discussed and analyzed.

4. The DEIS discusses the five corridor alternatives which were discussed in detail in the Draft EIR. §S.3.4. The DEIS acknowledges that the Alameda Corridor Final Environmental Impact Report ("EIR") identified Alternative 2.1B, consisting of a depressed trainway providing for two main line consolidated freight rail tracks, together with an adjacent at-grade drill track to provide for deliveries to local industries, as the locally preferred and environmentally superior alternative. Id. The City of Vernon agrees that Alternative 2.1B is the preferred and environmentally superior alternative and that the EIS should reach the same conclusion.

5. In further support of Alternative 2.1B, the City of Vernon hereby attaches as Exhibit A and incorporates by reference a copy of a cost analysis which was undertaken by Dokken Engineering on behalf of the City of Vernon. The cost analysis reviews cost estimates for Alternate 2.1B and further supports the conclusion that Alternative 2.1B is the overall superior alternative. The cost analysis also addresses a prior concern by the City of Vernon that the EIR had overstated the depressed trainway cost.

6. The DEIS states that the only two alternatives that are being considered by the DEIS are Alternative 2.1B and the No-Build Alternative. §S.3.4. Although the ACTA Governing Board and the EIR conclude that the No-Build Alternative would not adequately meet the Project goals, the DEIS states that insofar as the present NEPA process is concerned, the No-Build Alternative remains under consideration.

The City of Vernon agrees that the No-Build Alternative is unacceptable and should be rejected. In that regard, the City of Vernon emphasizes the following negative impacts which have been identified by the DEIS (§1.4) under the No-Build Alternative:

a. Local emissions would increase substantially. Carbon monoxide emissions would increase from 136 kg/day in 1990 to over 3,855 kg/day in 2020. Nitrogen oxides would increase from 2,268 kg/day in 1990 to 48,980 kg/day in 2020.

b. Noise exposure would increase substantially throughout the region. Noise levels in the year 2020 would exceed Federally-established abatement criteria for a total of 30,200 estimated persons, taking all rail lines into account, as compared with 10,600 affected persons in 1990. For the Southern Pacific, 5,900 affected persons in 1990 would increase to 7,200 in 2020. For the Union Pacific, 3,000 in 1990 would increase to 10,800 in 2020. For the Santa Fe, 1,700 affected persons in 1990 would increase to 12,200 in 2020.

c. An estimated 70 trains per day in 2010 and 100 trains per day in 2020, are projected. Increased train volumes and deteriorating roadway conditions would result in increasing delays, slower speeds, increased idle emissions from autos and trucks and less capacity to handle future demands. Auto/train conflicts would increase dramatically. An estimated 15,500 vehicle hours of delay would be expected daily, occurring on 200 at-grade railroad crossings.

d. Increased train movements on rail corridors throughout the region would intensify existing incompatibilities with adjacent land uses.

e. The potential for train derailments and associated safety hazards would be increased.

f. Increased train and vehicular traffic would result in substantial delays for police, fire and other emergency vehicles.

g. Energy consumption would increase in the region. In 1990, an estimated 1,287 train-kilometers (800 train-miles) of travel each day would increase to 4,184 train-kilometers (2,600 train-miles) in 2020. This would result in an attendant increase of diesel fuel consumed from 24,224 liters per day (6,400 gallons per day) in 1990 to 77,214 liters per day (20,400 gallons per day) in 2020.

7. The City of Vernon also points out that the EIR demonstrated the importance of the Alameda Corridor for both vehicular and truck traffic by analyzing traffic conditions in 2010 and 2020 under a No-

Build Alternative. The EIR (§5.4) concluded the following:

a. Between 1990 and 2010, the study area of vehicle miles of travel (VMT) is expected to increase by 20.6%.

b. Between 1990 and 2010, VMT along Alameda Street is expected to increase by 76.8%.

c. Between 2010 and 2020, study area of VMT is expected to increase by an additional 12.9%.

d. Between 2010 and 2020, VMT along Alameda Street is expected to increase by an additional 23.6%.

e. By the year 2020 the study area will be carrying over 36% more traffic than in 1990, and Alameda Street will be carrying 118% more traffic in 2020 than in 1990.

Based upon the above information which has been recognized by the DEIS, the City of Vernon believes that the No-Build Alternative is not a feasible alternative and should be completely rejected by the EIS in favor of Alternative 2.1B.

8. The City of Vernon also notes that the DEIS discusses "related projects" which "could be considered related to the Alameda Corridor Project." §2.10. The City of Vernon believes that the EIS should not downplay the relationship of other projects to the Alameda Corridor Project. Instead, the EIS should discuss the importance of the Alameda Corridor Project with regard to its mitigation of individual and cumulative negative environmental impacts which are anticipated for the "related projects." Additionally, the EIS should recognize that the Alameda Corridor Project is the necessary mitigation for the negative impacts which will occur as a result of other Port projects and that this further supports the rejection of the No-Build Alternative in favor of Alternative 2.1B.

We thank you for the opportunity to comment on the report.

Respectfully submitted,

Samuel Kevin Wilson
Acting Director of Community
Services & Water

SKW:EO:nc

cc: Bruce V. Malkenhorst, City Administrator/City Clerk (w/o enc.)
David B. Brearley, City Attorney (w/o enc.)

City of Vernon

(1) The comment is acknowledged. Subcomment (1) is acknowledged in the project's purpose and need (EIS, Chapter 1), and Subcomment (2) is regarded as the "locally preferred alternative" in this EIS.

(2) The City's position regarding the linkage between development at the Ports and the Alameda Corridor is noted. As has been stated numerous times before, the forces contributing to growth at the Ports are international in proportion and would not be constrained by the absence of the Corridor. The Corridor would mitigate many effects resulting from the train movements serving this activity, which is the stated purpose of the project.

(3) The functional relationship between the Alameda Corridor project and ports growth is acknowledged in the *Deep Draft Navigation Improvements, Los Angeles and Long Beach Harbors, San Pedro Bay, California; Final Environmental Impact Statement/Environmental Impact Report* (September 1992) published by the U.S. Army Corps of Engineers. Impacts and issues related to the expansion of the Ports are discussed in this report.

During the preparation of the Alameda Draft EIR, the *Highway Capacity Study Report* was prepared by DKS Associates to forecast vehicle and truck movements along the Corridor for the project planning years. A detailed origin-destination study of truck trips to and from the ports was conducted. The study forecasted an increase in port access Average Daily Truck Trips (ADTT) from 18,268 in 1989 to 44,539 in the year 2020. The study further identified, however, that trucks make up less than 10% of the total Average Daily Traffic (ADT) (5% for PM peak hour) for Alameda Street and the two parallel freeways (I-110 and I-710). For both 2010 and 2020, the ratio of Port trucks as a percentage of all trucks varies by segment. At the northern end of the project corridor, port related trucks generally make up about 1% of ADT or about 10% of all truck movements.

(4) The City of Vernon's position in favor of Alternative 2.1B is acknowledged for the record.

(5) The City's support of Alternative 2.1.B is noted for the record. [The cost analysis report was received and filed.]

(6) The City of Vernon's position in opposition to the No Build alternative is noted. It is required that a No Build alternative be examined in the EIS for purposes of comparing the effects of the proposed action, and also to demonstrate what would occur if the proposed action were not taken. The adverse effects associated with the No Build alternative that are noted in the comment are acknowledged.

(7) The City of Vernon's position in opposition to the No Build alternative, for the reasons stated in the comment, is noted.

(8) The EIS acknowledges that the Alameda Corridor project has an influence on a number of related projects. See Section 4.8 for a discussion of secondary and cumulative effects.

P.O. Box 682, Walnut, CA 91788-0682
21201 LA PUENTE ROAD
WALNUT, CALIFORNIA 91789-2018
Telephone (909) 595-7543
FAX (909) 595-6095

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JACK ISETT
Mayor
H. THOMAS SYKES
Mayor Pro Tem
"BERT" ASHLEY
WILLIAM T. CHOCTAW, M.D.
JUNE WENTWORTH
Council Members

CITY OF WALNUT

Mr. Ronald Kosinski
Interim District Division Chief
CalTrans, District 7
120 South Spring Street
Los Angeles, California 90012

Re: Draft Environmental Impact Statement
Alameda Corridor Project

Dear Mr. Kosinski:

Having three at-grade railroad crossings along the south side of the City, we will be impacted by any modifications to the existing train schedules.

Brea Canyon Road, Lemon Avenue and Fairway Drive, all provide ingress and egress to our City. We are currently burdened by delays to motorists and emergency vehicles by existing schedules. Increases will most certainly exacerbate the problem.

Because of our deep concerns for these issues, the City of Walnut is in complete support of the San Gabriel Valley Council of Governments letter dated March 3, 1995.

If you have any questions regarding our stance, please feel free to contact myself or the City Engineer, Ronald L. Kranzer at (909) 598-5605 or (909) 594-9702 respectively.

Sincerely,

Robert P. Morgenstern, Director of Municipal Services

c: Chris Londo, Acting City Manager
Ronald L. Kranzer, City Engineer
Roger Freisen, Planning Director

RM:sd

Attachment

City of Walnut

Please see the response to the San Gabriel Valley Council of Governments.

ARCO Products Company
Los Angeles Refinery
1801 East Sepulveda Boulevard
Mailing Address: Box 6210
Carson, California 90749-6210
Telephone 310 816 8100

Abe W. Johnson
Refinery Manager

March 13, 1995

Mr. Ronald Kosinski
Interim District Division Chief
Caltrans, District 7
120 South Spring Street
Los Angeles, California 90012

Subject: Comments to the Draft Environmental Impact Statement for the Alameda Corridor Project

Dear Mr. Kosinski:

The ARCO Products Company, Los Angeles Refinery has expressed numerous concerns about the impacts this project will have on the operation of their facilities located near the intersection of Alameda Street and Sepulveda Boulevard. These concerns were included in a letter to the Alameda Corridor Transportation Authority (ACTA) on September 30, 1992 regarding the Draft Environmental Impact Report, in public testimony by the refinery manager regarding the final EIR, and again in a letter to ACTA on February 3, 1994 regarding the scope for the Environmental Impact Statement.

We are disappointed to find that no specific mitigation measures have been proposed to alleviate any of the impacts the project will have on our refinery. Instead the DEIS now states "The Sepulveda Boulevard Overpass is a separate Ports Demonstration Access Project; to be cleared under a separate environmental document." I am again including copies of the earlier letters for your reference. We believe these effects are significant enough that they should be considered in the initial planning and funding for the overpass at this intersection.

The ARCO Products Company, Los Angeles Refinery supplies over 25% of the gasoline, as well as a large portion of the jet and diesel fuels, marketed in the Los Angeles area . The intense market for petroleum products in this region force us to operate at very low inventory levels. Any disruption to our crude supply or product distribution system will have a dramatic impact on local product availability and price to the general public. It will also impact our ability to survive in a highly competitive market place. As we have previously stated, we estimate the impact of the project on our facility to be in excess of $25 million dollars.

We again wish to reiterate previously express concerns regarding the severe impacts this project will have on the operation of our refinery and hope that proper mitigation measures will be undertaken by the project to alleviate these impacts.

If you have any questions or comments please contact Mr. Steve Krause at (310)816-8716.

Sincerely,

Abe W. Johnson
Refinery Manager

cc: J. W. Cronen, C. A. Johnson, S. G. Krause, W. W. Neil, M. Snir, D. J. Townsend (ARCO)
G. Schultz, City of Carson

ARCO Products Company
Los Angeles Refinery
1801 East Sepulveda Boulevard
Mailing Address: Box 6210
Carson, California 90749-6210
Telephone 310 816 8100

Abe W. Johnson
Refinery Manager

February 3, 1994

Mr. Gill Hicks
General Manager
Alameda Corridor Transportation Authority
Room 113
6550 Miles Avenue
Huntington Park, CA 90255

Subject: Scope for the Environmental Impact Statement for the Alameda Corridor Project

Dear Mr. Hicks:

In a letter dated September 30, 1992, ARCO submitted a list of concerns that the Alameda Corridor Project would have on its Los Angeles Refinery located at 1801 East Sepulveda Boulevard in Carson, California. The letter was in response to the comments solicited as part of the Draft Environmental Impact Report.

The ARCO Los Angeles Refinery Manager, Mr. Abe Johnson, also testified at a public hearing to express concern regarding impacts this project will have on our facility. Our letter and the ACTA response are included in the final EIR published for this project. We do not feel that our concerns have been adequately addressed in the EIR process. By writing this letter we are asking that our previous letter of concerns be included in the scope for the EIS.

Since the finalization of the EIR a number of other concerns have arisen, and we would also like these included in the EIS process. The majority of our comments regard the overpass proposed for Sepulveda Boulevard over Alameda Street in the City of Carson. We have also discussed most of these additional items with David Milner of DMJM/M&N in a meeting held at ARCO on January 31, 1994.

1. The ARCO Los Angeles Refinery currently supplies 28% of the gasoline marketed in the LA area. The bulk of our crude oil deliveries and product shipments are made through pipelines directly under the proposed grade separation of Sepulveda Boulevard over Alameda Street. Even a minor outage of these pipelines could result in a gasoline shortage felt throughout the LA region. What safeguards and planning measures will the project undertake to insure the uninterrupted usage of these lines?

2. A number of accidents have occurred at this intersection in the past where vehicles entered and damaged refinery property. When Sepulveda is elevated, vehicles crashing through the guard rails could end up going through the roof of our administration building and possibly injuring or killing our employees. We ask that consideration be given to the relocation of the administration building as a mitigation measure.

3. Our training center would become unusable with the access ramps as they are currently designed. The relocation of this building should also be considered as a mitigation measure.

ARCO Products Company is a Division of AtlanticRichfieldCompany

4. The ARCO product terminal located east of the intersection of Alameda and Sepulveda supplies approximately 8% of the gasoline to the LA region. The trucks can not turn right (east bound) on to Sepulveda. What provisions will the project undertake to insure product deliveries can be made without interruption?

5. The widening and grade separation of this intersection will result in a significant increase in the traffic volume and therefore the noise levels along Sepulveda. The majority of our technical and administrative staff are housed in the buildings adjacent to Sepulveda. What mitigation measures are proposed by the project to protect our employees from the increased noise levels?

6. The soils located in this region are possibly subject to liquefaction, due to an earthquake along the Newport-Ingelwood fault, as shown in the Planning Scenario for a Major Earthquake on the Newport-Inglewood Fault Zone, Special Publication 99, California Department of Conservation, Division of Mines and Geology, 1988. Will special design considerations be given to this project rather than standard Caltrans design?

7. Contaminated soil exists throughout this general area. How will the project handle these soils? Is soil remediation included in the project estimate to date? What measures will be taken to protect the public and our employees while excavations and soil remediation are occurring?

8. Have all affected parties been informed of this project? Air Products Inc. is planning to build a new oxygen plant in the near future. Are they aware of this project?

9. The overpass will require extensive foundation work which will involve relocating many pipelines located within this intersection. Where will the project relocate these lines? With adequate compenstation, relocation of our administration building could provide the space needed for the pipelines.

While fully intending to cooperate with the ACTA design staff through all design stages of this project, we would appreciate further investigation of the concerns expressed above and in our previous letter.

If you have any questions or comments please contact Steve Krause at (310)816-8716.

Sincerely,

Abe W. Johnson
Refinery Manager

cc: Joe Bookout
Dale Erickson
Nancy Hernandez
Carole Johnson
Kurt Johnson
Steve Krause
Walter Neil
Meir Snir
Dan Townsend

Los Angeles Refinery
1801 East Sepulveda Boulevard
Mailing Address: Box 6210
Carson, California 90749-6210
Telephone 213 816 8100

Abe W. Johnson
Refinery Manager

September30. 1992

Mr. Gill Hicks
General Manager
Alameda Corridor Transportation Authority
Room 113
6550 Miles Avenue
Huntington Park, CA 90255

Subject: Comments on the Draft Environmental Impact Report for the Alameda Corridor Project

Dear Mr. Hicks,

ARCO wishes to express the following concerns about the impacts that the Alameda Corridor Project will have on its refining operations located at 1801 East Sepulveda Boulevard in Carson California. We do not feel these impacts on business have been adequately addressed in section 5 of the DEIR. The bulk of our comments regard Segment D, and concern the overpass proposed for Sepulveda over Alameda Street.

1. Between 150 and 300 tandem trucks loaded with petroleum coke must be moved daily, from our coke handling facilities just north of Alameda and Sepulveda, to either our calcining facility, just off Anaheim Street, or to the harbor. What provisions will be taken during construction to insure these shipments will not be interrupted? Were these shipments included in the traffic study for this intersection? What routes will the trucks be able to take after the project?

2. The ARCO Los Angeles Refinery Training Center is shown surrounded by access ramps and retaining walls in the preliminary design. Current access to the training center is a one-quarter mile walk across the street. After the project it appears to be about a four mile journey between the refinery and the training center as we would have to use Gate 7 on Wilmington Avenue. This will preclude our use of this facility.

3. There does not appear to be any access to our administration building with the current preliminary design. Our entrance at 1801 E. Sepulveda is completely cut off and all visitor parking is eliminated. This is the main entrance to the refinery for employees and visitors.

4. The bulk of our product shipments by truck including propane, butane and sulfur also use the entrance at 1801 E. Sepulveda. The truck scales we use to control these shipments are located just north of this entrance gate. No mitigation measures are proposed for either during or after construction. It would appear to require our use of Gate 7 which is an uncontrolled access on Wilmington Avenue.

5. There is currently a conveyor tunnel under Alameda Street through which we ship approximately 3000 tons a day of petroleum coke from our main refinery on the west side of Alameda to the storage facility on the east side of Alameda. If Alameda is to be widened to the East as shown on the preliminary plans, what mitigation measures are planned during construction and as part of the final design?

6. The access ramp shown circling the northeast corner of Alameda and Sepulveda removes a large portion of the parking lot used for our maintenance and construction contractors, restricts the land available for coke storage and eliminates the storm water retention pond that prevents rain water which contacts the coke from moving off-site. Are any mitigation measures envisioned for these impacts?

7. There are currently over fifty pipelines that cross under Alameda Street servicing our facility alone. These are the main means by which crude oil is supplied to the refinery and products are shipped out. If Alameda is to be widened as proposed many of these lines will be affected. Have any mitigation measures been considered?

The only mitigation measure we could find for our facility in the DEIR is listed on page 5-297 and lists replacement of the landscaping around our training facility. As you can see from the list presented above, we feel the project will have a much greater impact on our operations that you have presently considered. We estimate the impact on our operations to be in excess of $25 million dollars. What further mitigation measures such as compensation for property loss are planned?

A few technical errors were also believed to be present upon review of the DEIR which we wished to point out.

1. On Table 5-24 under Segment D, all the streets are listed as running in a North/South direction. Many of these streets such as Sepulveda Blvd., Carson Street, 223rd Street, Pacific Coast Hwy, etc. run East/West.

2. On page 5-144, Sepulveda Boulevard is listed as "an east-west major highway that has four to six lanes in the study area". Sepulveda Boulevard currently has only one lane in each direction between Wilmington and Alameda.

Sincerely,

Abe W. Johnson
Refinery Manager

cc: George Ross
Mike Myers
Charles Schwab
Ron Brown
Walt Dardenne-Ankringa
Larry Drake
Steve Krause

P:\UNITFILE\PROPERTY\ALMDCO82.DOC

ARCO Products Company

The essence of the comment letter is to raise certain issues concerning the physical relationship between the subject property and a related project, the Sepulveda Boulevard overcrossing. This project is not specifically required for implementation of the Alameda Corridor, and it is currently being developed by the City of Carson. The City of Carson should be contacted for further information about this project.

Automobile Club of Southern California

HEADQUARTERS: 2601 SOUTH FIGUEROA STREET • LOS ANGELES, CALIFORNIA 90007-3294
MAILING: P.O. BOX 2890 TERMINAL ANNEX • LOS ANGELES, CALIFORNIA 90051-0890

February 23, 1995

Ronald Kosinski
District Division Chief
Caltrans, District 7
120 South Spring Street
Los Angeles, CA 90012

Dear Mr. Kosinski:

Thank you for providing a copy of the Alameda Corridor Draft Environmental Impact Statement (DEIS). The information contained in the document appears to be substantially complete. In addition, the Auto Club remains supportive of developing the Alameda Corridor.

The draft EIS re-verifies the need for this innovative transportation project. However, we were surprised to learn that the previous approved Environmental Impact Report's (EIR) widening of Alameda Street to 6 lanes has been abandoned.

According to the draft EIS traffic intersections are projected to operate with levels of service (LOS) "D" or better until year 2010. Yet, by year 2020 most intersections have degraded to LOS "F". We suggest mitigation measures be identified that will improve these projected year 2020 traffic impacts.

Again we appreciate the opportunity to comment on this draft EIS. If there are any questions, please call me at (213) 741-4469.

Sincerely,

John R. Zeigler

John Zeigler
Transportation Engineer

JZ/lc

Automobile Club of Southern California

During the CEQA process, Alternative 2.1A was identified as the environmentally superior alternative, but was modified further to become the locally preferred alternative (Alternative 2.1B). Concern over right-of-way impacts and traffic considerations led to refinements in the roadway configuration embodied in this modification. In reviewing the traffic analysis that had been conducted for the EIR, it was determined that additional capacity would not be required to meet port related goods movement by trucks. Also, it was determined that the traffic flow benefits of the six-lane alternative would be outweighed by the adverse right-of-way impacts that would be incurred, as well as the difficulty of obtaining right-of-way. Therefore, the corridor would function adequately for purposes of Corridor freight movements without additional lanes; however, intersection improvements including turn lanes and improved signalization will be included in the project as part of the project definition adopted by the ACTA Governing Board and subsequently the federal lead agencies. It has been determined that post-project traffic conditions would be no worse than under the No Build Alternative.

K.G. and M.C. Heath

19009-443 Laurel Park Road
Rancho Dominguez, CA 90220-6067

Messages: (310) 632-3381

RONALD KOSINSKI, CHIEF, OFFICE OF ENVIRONMENTAL PLANNING, DISTRICT 7
120 SOUTH SPRING ST., LOS ANGELES, CA 90012 THIS DATE: 2/21/94

DEAR MR. KOSINSKI:
RE: ALAMEDA CORRIDOR PROJECT, TO THE PORTION BEGINNING SOUTH OF STATE ROUTE 91 ON ALAMEDA ST. ROUTE FROM THE BLUE-LINE OVER-CROSSING SOUTHWARD, THROUGH ITS INTERSECTIONS WITH LAUREL PARK ROAD, DEL AMO BOULEVARD, DOMINGUEZ ST. AND CARSON ST.

ITEMS AT ISSUE:
1. TRAIN TRAFFIC INTERRUPTION OF EAST-WEST COMMERCE ON DEL AMO (ESPECIALLY) PLUS... SAME PROBLEM AT DOMINGUEZ AND CARSON INTERSECTIONS.
2. ALAMEDA AND ALAMEDA-WEST STREETS FLOOD BLOCKAGE **2 PLACES:** A)- JUST NORTH OF DEL AMO BL.; B)- JUST NORTH OF DOMINGUEZ ST.

BESIDE CONSTRUCTION IMPROVEMENTS TO ALAMEDA ST., WE URGE YOU TO PLAN A **DEL AMO OVER-CROSSING** OVER ALAMEDA AND THE TRAIN-WAY, LOOSELY SIMILAR TO THOSE OF EXISTING OVER-CROSSINGS AT ARTESIA BL. OR 223RD ST./WARDLOW ROAD.

LET ALAMEDA TRAFFIC ONTO DEL AMO BOTH WAYS, AND DEL AMO TRAFFIC ONTO ALAMEDA BOTH WAYS. ASSURE TOO, THAT ALAMEDA TRAFFIC TO WEST BOTH WAYS (& VICE VERSA).

OUR LOCATION- IN RANCHO DOMINGUEZ. WE BORDER NEAR YOUR PROJECT WEST EDGE, STRETCHING NEARLY THE LENGTH OF LAUREL PARK ROAD, FROM NEAR THE BLUE-LINE OVER-CROSSING NORTH EAST VICTORIA & LAUREL PARK ROAD, SOUTHWARD TO ROUGHLY RANCHO WAY INTERSECTION WITH LAUREL PARK ROAD NEAR ITS JUNCTION WITH ALAMEDA AT THE TRAFFIC SIGNAL.

BACKGROUND -THE PLIGHT WE'VE LIVED WITH FOR YEARS-
WE'RE MORE ISOLATED FROM SHOPPING, SCHOOLS AND WORK THAN MANY RESIDENTIAL AREA WE KNOW. THIS, COMPOUNDED BY NOTORIOUS TRAIN TRAFFIC DELAYS ON DEL AMO & OTHER GRADE CROSSINGS, AND BY PERIODIC FLOOD-CLOSURES OF ALAMEDA ST.

PLANNING-WISE, WE'VE BEEN TREATED THE SAME AS INDUSTRIAL ZONE THAT SURROUNDS US. WITHIN WATSON-ALAMEDA INDUSTRIAL PARK, WE ARE TECHNICALLY TWO HIGH DENSITY RESIDENTIAL CENTERS AT BOTH ENDS OF LAUREL PARK ROAD, WITH TOTAL POPULATION NEAR 5000. WE DRIVE 2300 CARS AND RESIDE IN 1,021 RESIDENTIAL PARK MODULAR HOMES. OUR ONLY ACCESS CORRIDORS ARE A) LAUREL PARK ROAD TO ALAMEDA OR RANCHO WAY TO DEL AMO; AND B) LAUREL PARK ROAD VIA VICTORIA ST. TO WILMINGTON AVE.

SEEMS TO US, MOST AREA RESIDENTS FUNNEL ONTO ALAMEDA AT LAUREL PARK ROAD, GOING MOSTLY SOUTHWARD, TOWARD DEL AMO, TO WORK, SCHOOLS AND SHOPPING. FAVORITE DESTINATIONS ARE LONG BEACH (PRIMARILY) AND CARSON (SECONDARILY).

PLEASE CONSIDER AS WE HAVE, BENEFITS AND COMMERCIAL DRAW OF **FREE-FLOW TRAFFIC** IN THESE AREAS FOR COMMERCIAL BUSINESS TO FILL THE SCATTERED VACANT PROPERTIES IN RANCHO DOMINGUEZ. THIS, NOT TO MENTION THE ISOLATION RELIEF WE NEED.

RESPECTFULLY YOURS,

K.G. Heath for

K. G. AND M. C. HEATH.

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K.G. & M.C. Heath

(1) An overcrossing structure is planned for Del Amo Boulevard as a related project under the Ports Access Demonstration Project program. The County of Los Angeles is the lead agency, responsible for design and construction. A similar grade separation is currently under construction at Carson Street by the City of Carson. The grade crossing at Dominguez Street will be closed.

(2) Alameda Street will be reconstructed at Del Amo Boulevard and Dominguez Street under the Ports Access Demonstration Project program, with the County of Los Angeles as the lead agency. Local flooding should be corrected by this project.

I am a disabled senior citizen, member of the Homeowners Association and a resident of the Racquet Club Villas dba Heritage Estates of Compton. This tract lies south of Compton Boulevard, north of Myrrh Avenue and wholly between Willowbrook on the west and Alameda on the east. These brand-new townhomes are considered a showplace of the City of Compton. My concerns are:

(1) the devaluation of these properties and all residential properties lying in the corridor between Willowbrook and Alameda from Greenleaf through to Rosecrans or El Segundo;

(2) the access of fire and emergency vehicles to the residences within this area;

(3) the higher levels of noise;

(4) The unhealthful levels of air pollution; and

(5) the inevitable increase in ground movement due to the increased train and vehicular traffic.

The Racquet Club Villas seem to be the only residential section which does not have a buffer of business buildings on the west side of Alameda or the east side of Willowbrook.. Other homes within this corridor have no buffer on Willowbrook but as far as I can see have a business buffer along the Alameda border. The County Assessor's original valuation of three- bedroom homes in this complex was $210,000. At present the three- bed room homes are selling for 1/4 to 1/3 of that amount. I am nearing retirement and purchased my new four-bedroom home for easier upkeep and sufficient living space for an attendant, should I need one. The four-bedroom models obviously cost more and owners stand to lose more in an overall devaluation of this complex. My new home is satisfactory to me, but with the prospect of this Alameda transportation corridor I have to consider the impact on my investment. Many families in the complex are selling or attempting to sell, sometimes at substantial loss. Particularly those persons with children. Their perception of this impending project is negative and they prefer not to wait for "the other shoe to fall". I would be interested to know if there has been any consideration of the taking of any homes within the boundaries of Greenleaf and El Segundo, between Alameda and Willowbrook.

There has already been an increase in the train traffic on Willowbrook and Alameda. I work in Downey, and am sometimes "out in the field" and near enough to return home for lunch. However, increasingly, I find it necessary to go south to I-91 rather than use I-105 and approach from the North because of the increased daily frequency of simultaneous train traffic on Alameda and Willowbrook. Traffic will be stopped in both directions, East and West while the trains are running on both Alameda and Willowbrook at the same time. This coupled with the regular passage of the Metro Blue Line train is already having a major negative impact on this area. Being a disabled person with mobility and heart /lung problems and having needed ambulances in recent years, I am particularly sensitive to the need for emergency medical care. And I would hardly like to have my house burn down while the fire truck couldn't pass across Myrrh Avenue or Compton Boulevard because of the trains passing.

I have heard Mr. Harper, Compton Chamber of Commerce, state that he personally started a

citizen s protest against the noise of the Blue Line train horns; but they're probably way over an acceptable decibel level for such things. In addition, the freight trains regularly pass up and down on Willowbrook at night, almost hourly blasting their horns throughout the night. Moving the trains to Alameda will not stop that. They will still be heard unless there is a tunnel or the trench can be covered .

The currently increased train traffic is already producing unhealthful levels of air pollution. I am a dedicated gardener and have spent many enjoyable hours working in my patio since I purchased my townhome in 1992. My patio area and the common areas surrounding have been beautifully landscaped. But during the last year I find myself having to clean off the patio furniture daily because it is filmed with dust. Plus I have had to begin hosing off the climbing vines and trees here since they too become heavily grimed with soot. Increases of this kind could eventually kill out some very prize specimen trees and shrubs. Not to mention breathing all that dust and pollution.

Any person living at Racquet Club Villas could attest to the heavy ground shaking which occurs now when a train deadheads North pulled by 4-5 engines. I was downstairs when one of the heavy earthquake temblars recently occurred. I found myself waiting to determine if i t was really a freight train rumbling by. If upstairs, the trains shake you in your bed. If you are using the bathroom, the vibrations actually shake you on the throne. And the intermittent noise disturbs your rest, just about every hour on the hour at night.

This community of 102 homes is largely composed of working-class people; young, old, married with and without children, single and includes a broad ethnic mix. Some few are retirees. But with the advent of this Alameda Corridor Project our homes will certainly be devalued. Our health and safety will be impacted. by the level of traffic that has been projected. There will be unacceptable levels of noise and air pollution. And even if there is a tunnel or covered trench, I don't think that would alleviate any of the ground-shaking which we already experience. Increased ground movement would really be unbearable.

I must conclude that the building of these townhomes here in downtown Compton was very poor planning on someone's part if the scenario of the Transportation Corridor was known. However, if this project is inevitable, then there should be some consideration to include the taking of the residential tract that includes Racquet Club Villas and making the downtown an all business area. The building of the Alameda Corridor will be physically and financially detrimental to all residents and homeowners in this tract.

Respectfully submitted,

Kathleen D. Whitlow-Anderson

Kathleen D. Whitlow-Anderson
Member, Heritage Estates of Compton
Homeowners Association

MAILING ADDRESS:

128 RACQUET CLUB DRIVE
COMPTON, CA 90220-3181

Heritage Estates of Compton

(1) Current evidence would suggest that property values would not be adversely affected by the proposed project.

(2) Fire and other emergency vehicle access across the Corridor will be improved by the proposed project. Please see Section 4.7.10 of the EIS for further information.

(3) Noise impacts will occur as described in Section 4.7.3 of the EIS. As is shown on Figure 4-2 (Sheet 2 of 3), adverse noise impacts are not expected in the area that is the subject of this comment.

(4) Air quality would be improved as a result of the proposed project. Please see Section 4.2 of the EIS.

(5) The proposed project will not result in adverse vibration impacts. Please see Section 4.7.4 of the EIS for further information.

SAN GABRIEL VALLEY
COMMERCE
and CITIES
CONSORTIUM

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March 9, 1995

Mr. Ronald Kosinski
Interim District Division Chief
CalTrans, District 7
120 South Spring Street
Los Angeles, California 90012

Dear Mr. Kosinski:

The San Gabriel Valley Commerce and Cities Consortium is a private, non-profit organization serving the 31 cities and 48,000 businesses in the San Gabriel Valley. Our mission is to increase the economic vitality of the Valley, while maintaining the quality of life for our residents and businesses.

We would like to go on record in stating our interests in the impact of the Alameda Corridor on the San Gabriel Valley. As far as we understand it, the Alameda Corridor Project does not take into consideration how the freight that is moved from the ports to Los Angeles will travel its remaining route to final destination and what impact that freight movement will have on the communities through which it will travel. A cursory review of the project indicates that said impacts will be sizable. The Consortium supports the Alameda Corridor Project as an opportunity to increase the attractiveness of doing business in Southern California. We would like, however, to make sure that the impacts of the increased freight movement be identified and responded to as a part of the DEIS process for this project.

Attached is a fact sheet detailing the activities of the Consortium and a listing of those organizations who financially support this organization. We hope that you will take our comments into consideration.

Sincerely,

Marco L. Brown
Executive Vice President

MLB/df

Attachment

100 N. Barranca Ave. ■ 7th Floor ■ West Covina, CA 91791 ■ Telephone 818 858 2023 ■ FAX 818 858 9202
an economic development corporation se : *31 communities of the San Gabriel Valley*

San Gabriel Valley Commerce and Cities Consortium

Please see the response to the San Gabriel Valley Council of Governments.

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Shell Oil Company

Box 4848
Anaheim, CA 92803-4848
511 N. Brookhurst St.
Anaheim, CA 92801-5288

January 31, 1995

Mr. Ronald Kosinski
Interim District Division Chief
Department of Transportation, District 7
State of California Business and Transportation Agency
120 South Spring Street
Los Angeles, California 90012-3606

Dear Ms. Kosinski:

ONV900250

CITIES OF LOS ANGELES, VERNON, HUNTINGTON PARK, SOUTHGATE, LYNWOOD, COMPTON & CARSON, LOS ANGELES COUNTY, CA
THOMAS GUIDE 674 F1 F2 F3 F4 F5 H1, 794 E7 G5 G6 H1 H2 H5 J1 J5
SHELL CALIFORNIA PIPELINE COMPANY (COMMON CARRIER) PIPELINES:
L.A. PRODUCTS LINES 1 & 2
SHELL OIL COMPANY PIPELINES:
CARSON PLANT LINES
THUMS CRUDE OIL LINES
HARBOR LINES (ABANDONED)
R.F.C. LINE (ABANDONED)
YOUR ALAMEDA CORRIDOR PROJECT

Reference is made to your January 23, 1995, letter invitation to comment on its enclosed Draft Environmental Impact Statement Summary for the captioned project. We understand that the Corridor under consideration is in a strip of land generally (but with wide variations) 400 feet wide paralleling Alameda Street from downtown Los Angeles to San Pedro, California.

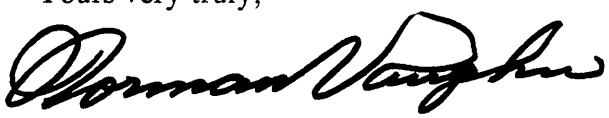
Shell's comments are expressed in our September 16,.1990, letter to Givens, Saiki & Williams, and August 25, 1993, letter to World Port of Los Angeles, copies attached along with a copy of our August 22, 1990, Letter of Transmittal of drawings showing the locations of the captioned pipelines within the project areas. Mr. James Givens informed us that all such drawings were forwarded with other data to Daniel, Mann, Johnson & Mendenhall, consultant to Port of Los Angeles as lead agency on the corridor project in consortium with Port of Long Beach.

Shell Oil Company and Shell California Pipeline Company pipelines, including but not necessarily limited to those captioned, will be affected by the Corridor project. Please forward to this office all preliminary and subsequent plans for construction in the vicinity of any of the Shell pipelines.

Caution is essential in any excavation (including exploratory) or other construction activity in the vicinity of any of the pipelines. At least two work days prior to any such work, arrangement should be made with our Mr. Daniel P. Coburn (telephone 310 988 3305) for on-site pipe location markout and standby. No work should commence or continue near any of the pipelines except in the presence of Mr. Coburn or his designate.

If more data on Shell facilities are needed, please telephone me on 714 520 3747.

Yours very truly,



Norman Vaughn
Senior Land Agent

Attachments

cc (w/out attachment):

Mr. David Milner, Project Manager
Daniel, Mann, Johnson & Mendenhall
3250 Wilshire Boulevard
Los Angeles, California 90010

Mr. James Givens
Givens, Saiki & Williams
13135 Barton Road, Suite A-1
Whittier, California 90605

Shell Pipe Line Corporation

West Coast Area
P O Box 4848
511 N. Brookhurst Street
Anaheim, CA 92803

August 25, 1993

Mr. Art Goodwin
World Port Los Angeles
Box 151
San Pedro, California 90733-0151

Dear Mr. Goodwin:

CITIES OF LOS ANGELES, VERNON, HUNTINGTON PARK, SOUTHGATE,
LYNWOOD, COMPTON & CARSON, LOS ANGELES COUNTY, CALIFORNIA
THOMAS GUIDE 674 F1 F2 F3 F4 F5 H1; 794 E7 G5 G6 H1 H2 H5 J1 J5
SHELL CALIFORNIA PIPELINE COMPANY COMMON CARRIER PIPELINES:
L.A. PRODUCTS LINES 1 & 2
SHELL OIL COMPANY PIPELINES:
CARSON PLANT LINES
THUMS CRUDE OIL LINES
HARBOR LINES (ABANDONED)
R.F.C. LINE (ABANDONED)
YOUR PROPOSED CONSOLIDATED TRANSPORTATION CORRIDOR
OUR PROJECT ONV900250

It is our understanding that the captioned corridor is under consideration in a strip of land generally (but with wide variations) 400 feet wide paralleling Alameda Street from downtown Los Angeles to San Pedro, California. Drawings showing our pipelines within such corridor were furnished to the consulting firm Givens, Saiki & Williams in 1990, and Mr. James Givens has informed us that all such drawings were forwarded, with other data, to DMJM, consultant for the Port of Los Angeles as lead agency on the corridor project in consortium with the Port of Long Beach.

Shell Oil Company and Shell California Pipeline Company pipelines, including but not necessarily limited to those captioned, will be affected by your proposed project, which we understand is now "on hold" but still viable.

We will appreciate an opportunity to attend any meetings regarding portions of the corridor wherein our pipelines are located, and the receipt of preliminary and subsequent plans when available. If you need more information on our facilities, please telephone me at 714 520 3747.

Caution is essential in any excavation (including exploratory) or other construction activity in the vicinity of any of our pipeline facilities. At least two work days prior to any such work, arrangement should be made with our Mr. Daniel Coburn (telephone 213 988 3305) for on-site pipe location markout, and standby. No work should commence or continue near any of the pipelines except in the presence of Mr. Coburn or his designate.

Yours very truly,

/s/ Norman Vaughn

Norman Vaughn
Senior Land Agent

cc - Mr. David Milner, Project Manager
Daniel, Mann, Johnson & Mendenhall
3250 Wilshire Boulevard
Los Angeles, California 90010

Shell Pipe Line Corporation

West Coast Division
P.O. Box 4848
511 N. Brookhurst Street
Anaheim, CA 92803

September 16, 1990

Mr. Harold L. White, P.E.
Project Engineer
Givens, Saiki & Williams
13135 Barton Road, Suite A-1
Whittier, California 90605

Dear Mr. White:

CITIES OF LOS ANGELES, VERNON, HUNTINGTON PARK, SOUTHGATE, LYNWOOD, COMPTON & CARSON; COUNTY OF LOS ANGELES, CALIFORNIA
TG PAGES 52, 53, 58, 59, 64, 65, 69, 70, 74
PROPOSED CONSOLIDATED TRANSPORTATION CORRIDOR; YOUR W.O. 90-22
R/W FILES: TO BE DETERMINED; OUR R/W PROJECT: ONV900250

Reference is made to your June 27, 1990, request for identification of our facilities in the captioned project areas located generally (but with wide variations) in a 400-foot wide strip of land paralleling Alameda Street from downtown Los Angeles to San Pedro, California.

Our drawings showing such facilities were forwarded to the attention of your Mr. John Lee by our Mr. M. J. Romley with his June 21, 1990, letter, pursuant to your June 15, 1990, inquiry.

Please indicate as soon as practicable as to whether you received such drawings, and when available forward to this office two copies of your preliminary and subsequent plans. Should you require additional information on our facilities, please telephone me on 714/520-3747.

Caution is essential in any excavation (including exploratory) or other construction activity in the vicinity of any of our pipeline facilities. At least two work days prior to any such work, arrangement must be made with our Mr. Dan Coburn (telephone 213 988 3305) for on-site pipeline location markout and standby. No work should be commenced or continued near any of the pipelines except in the presence of Mr. Coburn or his designate.

Yours very truly,

Norman Vaughn

Norman Vaughn, Land Agent

SHELL PIPE LINE CORPORATION
WEST COAST DIVISION
P. O. BOX 4848
Anaheim, CA 92803

LETTER OF TRANSMITTAL

Givens, Saiki & Williams	Date: August 22, 1990
13135 Barton Road. Suite A-1	Consolidated Transportation
Whittier, Ca 90605	Cooridor
ATTN: John Lee	W.O.NO. 90-22

GENTLEMEN:

WE ARE FORWARDING By Mail [X] By Messenger [ ] Your Pick-up [ ]

No. Copies	Facility	Dwg. No.
1	Abandoned R.F.C. Lateral	Y-2295
1	Idle Wilmington Signal Hill	Y-1350
1	42" Pier "E"	Y-5036
1ea.	Signal Hill Products	Y-3464 & Y-3465
1ea.	Brea Crude	Y-5423 & Y-5424
1	Thums Crude	Y-3561-01
1ea.	Mormon Islands	Y-4788a & Y-4788b Y-4789 & Y-4790

REMARKS:

This Material is Sent for [ ] Checking [X] Information

[X] Your Files [X] Per Your Request [ ] Other

Requesting Agent by

John Lee

Shell Pipe Line Corp.

Mike Bringham

Shell Oil Company

Requirements for relocation and/or protection of utilities and underground pipelines will be determined in coordination with the owner of any pipeline on an individual basis during the design phase of the project. Construction contracts will require that proper notice be given to owners of pipelines prior to any excavation or construction activity in the vicinity of any pipelines.

Michael L Kranitz
Attorney

Texaco Inc

10 Universal City Plaza
Universal City CA 91608 1006
818 505 3029
FAX 818 505 3079

VIA FACSIMILE

RECEIVED
MAR 14 1995
ENV. PLAN. BR.

March 13, 1995

Mr. Ronald Kosinski
Interior District Division Chief
Caltrans, District 7
120 South Spring Street
Los Angeles, CA 90012

Re: Comments to the Alameda Corridor project Draft Environmental Impact Statement ("DEIS")

Dear Mr. Kosinski:

Enclosed please find the February 1, 1995 letter from me to Mr. Michael Gasparro of Holmes and Narver and James Kinkor of World Port L.A. In said letter I raised the issues of economic impact and safety concerns that the Alameda Corridor Project may have on the Texaco Refining and Marketing Inc. ("Texaco") facilities located on Pacific Coast Highway in Wilmington, California.

The DEIS, while acknowledging the potential for significant economic impact during construction does not appear to address how such impact is to be mitigated or compensated for. Nor does the DEIS appear to adequately deal with safety concerns in the event of an emergency situation wherein emergency vehicles would need ingress and egress to the Texaco facilities.

Please accept this letter, together with the attached February 1, 1995 letter as Texaco's comments on the DEIS to be incorporated in the final EIS.

Please contact me if you have any questions.

Very Truly Yours,

MLK:mo
0315/3-5wp

Enclosures

cc: ZB-AS-ML-RGC-DCE (w\o encl.)

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Michael L Kranitz
Attorney

Texaco Inc

10 Universal City Plaza
Universal City CA 91608 1006
818 505 3029
FAX 818 505 3079

February 1, 1995

Michael G. Gasparro, P.E.
Associate Vice President
Holmes & Narver
999 Town & Country Road
Orange, CA 92668

James Kinkor, P.E.
Civil Engineer
World Port LA
Port of Los Angeles
425 South Palos Verdes Street
San Pedro, CA 90733-0151

Re: Alameda Corridor Railroad Access Project

Gentlemen:

I am writing to request additional information and express some concerns held by Texaco Refining and Marketing Inc. ("Texaco") regarding the impact of the above-referenced project upon Texaco.

It is Texaco's understanding that the Port of Los Angeles (the "Port") is requiring certain work consisting of the casing and moving of pipelines to be completed by May 1, 1995. While maps have been provided to Texaco and Texaco has provided information regarding lines to the Port, Texaco does not currently have sufficient information to complete the required work. Therefore, I am requesting that representatives of Texaco, the Port and Holmes & Narver ("H&N") meet and if necessary walk the site in order to determine with certainty exactly which lines are going to require casing and/or relocation.

Of major concern to Texaco is the fact that the main entrances to three Texaco facilities, the Refinery, the Lubricants Plant and the Sales Terminal are adjacent to the railroad corridor where it crosses Pacific Coast Highway ("PCH"). The current railroad schedule which consists of only six or seven small switching trains per day causes significant traffic congestion in front of Texaco's facilities.

The Alameda Corridor Project will substantially increase traffic congestion around the entrances to the three Texaco facilities in three ways. First, there will be major disruption of PCH during construction. Second, there will be increased container traffic as container yards are being set-up east of the Texaco Refinery. Last, the permanent increase in train traffic to an estimated

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sixty-four container trains per day travelling at speeds of less than twenty miles per hour will create significant ingress and egress problems for the Texaco facilities that could have serious safety and economic consequences to Texaco's operations.

In previous discussions, all of the involved agencies, consultants and companies are in agreement that PCH will need to be elevated over the railroad corridor. However, there does not appear to be an affirmative commitment from CalTrans that such an overpass will indeed be built, let alone when such construction could begin. Therefore, Texaco would like to propose two possible solutions to the problems we foresee. One suggestion would be to construct an improved road between Alameda Street and the west boundary of the Texaco Sales Terminal with traffic signals installed both at the intersection of such new road and Alameda and on PCH adjacent to the Refinery gate. In the alternative, traffic signals could be installed adjacent to both the Refinery and the Sales Terminal gates, with signal timing, access width and turn lanes being determined prior to installation.

Unless one of the foregoing solutions is implemented prior to the start of the railroad construction, access of emergency vehicles to the Texaco facilities will be significantly impaired, creating serious health and safety concerns in the event of a major emergency situation. Also, as indicated above, the economic impact on the trucking distribution out of the Sales Terminal and Lubricants Plant could be substantial.

Texaco has not been provided with any documents or studies addressing these issues. Therefore, Texaco would request to be provided copies of the Environmental Impact Report and any other studies or reports that address the impact of the Alameda Corridor Project on Texaco's employees, the issues surrounding traffic congestion and the economic consequences to the Texaco facilities.

Please contact me at your earliest convenience so that we can schedule a meeting to address the question of the pipelines as well as to discuss the other matters raised above.

Very truly yours,

Michael L. Kranitz

MLK:mo
0116\3-5wp

cc: ZB-AS-ML-RGC-DCE

Texaco Inc.

The construction of the Pacific Coast Highway grade separation project is a related project with Caltrans as the lead agency. Access issues related to the grade separation project will be addressed in the Caltrans prepared Traffic Management Plan. Construction of Alameda Corridor main tracks will be coordinated with the PCH project to minimize impacts to local circulation and access.

WATSON LAND COMPANY

March 13, 1995

Mr. Ronald Kosinski
Interim District Division Chief
District 7 California Department
Transportation
120 So. Spring Street
Los Angeles, Ca 90012

Subject: Alameda Corridor Project/Comments to Draft Environmental Impact Statement ("DEIS")

Dear Mr. Kosinski:

The following comments and supporting documents are submitted on behalf of Watson Land Company, in response to the DEIS dated January 1995 for the Alameda Corridor Project.

Watson Land Company owns, leases and manages over 450 acres of land and nearly 3 million square feet of existing office and light industrial facilities along the Alameda Corridor, and specifically within the identified land use impact area of 1,000 feet on either side of the Alameda Corridor. On numerous occasions, both with public testimony and written comments, Watson Land Company has expressed its concerns regarding certain unmitigated effects of the Alameda Corridor project. While Watson Land Company recognizes the long term benefits and necessity of the Alameda Corridor Project, we must continue to insist that the adverse impacts described in this letter be appropriately mitigated. Unmitigated or insufficiently mitigated impacts of the Alameda Corridor Project raise significant legal and constitutional issues concerning inverse condemnation and the taking of Watson's land without just compensation, as well as issues of due process of law and equal protection. Accordingly, we once again request that the impacts detailed below be specifically addressed and appropriately mitigated.

1. **Elimination of Access.** The Alameda Corridor Project as proposed (97 trains per day) eliminates access to Watson's property located south of Lomita Boulevard, west of Alameda through its single existing access (a private road just south of Lomita) and fails to identify any feasible alternate access. Although the draft and final EIRs include general statements that the Alameda Corridor Transportation Authority intends to ensure that access is maintained to and from Watson's 62 acre site at Lomita and Alameda, no workable access is identified. The ACTA's general statement of intent is also reflected in the DEIS, which states that: "Watson Land Company will continue to be consulted regarding potential project impacts on its property".

22010 SOUTH WILMINGTON AVENUE, CARSON, CALIFORNIA 90745 GENERAL OFFICE (310) 952-6400 FAX (310) 522-8788

once again emphasize that CEQA requires the ACTA to consider the project's impacts and identify feasible mitigation measures before moving forward with the project. We have on numerous occasions pointed out the specific problems with the proposed alternate access which render the present design infeasible. The ACTA's failure to implement a workable solution to the access problem would be tantamount to a governmental taking of Watson's multi-million dollar property. The final EIR and the DEIS propose to provide access to and from Watson's 62 acre site via Drum Avenue to the south of the site. Not only would this proposal effectively landlock 24 acres of Watson's 62 acre site, it would also violate the City of Los Angeles' prohibition of truck traffic through the nearby residential neighborhood. The final EIS must specifically address the significant adverse environmental effects of this heavy truck traffic through this predominantly minority and low income neighborhood and must specify how these effects would be mitigated. We believe that the only practical and effective means of adequately addressing the access impacts of the Alameda Corridor Project on these properties is to extend and improve Lomita to the east, and to extend Coil Avenue to the northeast and connect it to Drum Avenue. We strongly urge you to revise the DEIS to include these measures as the most feasible access alternative with the least adverse impacts.[1]

2. **Noise and Vibration Impacts.** Neither the DEIS nor the final EIR adequately address or mitigate the severe noise and vibration impacts upon Watson's property. Watson remains concerned that the project will result in severe noise and vibration conditions, and will also create significant visual blight upon its property. Again, Watson must insist that comprehensive and effective mitigation measures be taken to protect its land and buildings along the Alameda Corridor. Watson Land Company remains concerned about the inevitable diminution in land value which will result from the severe noise and vibration impacts. Unmitigated or inappropriately mitigated noise and vibration impacts may result in Watson's inability to develop all or a portion of this prime land, and may preclude the use of existing buildings for office and hi-tech research and development uses in accordance with the City of Carson Redevelopment Plan. The characterization of the use of this property in the final EIR and in the DEIS as "industrial in nature" is inaccurate. In fact, heavy industrial uses are prohibited. The City of Carson Redevelopment Agency is in the process of revitalizing the subject area and removing the few remaining incompatible uses. The attached Exhibit "B" specifically addresses the final EIR responses regarding the effects of noise and vibration on the Watson Corporate Center. Based on the noise criteria given in the final EIR, without mitigation there would be a "Significant A" impact for portions of Watson Corporate Center property contiguous to the

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[1] Contrary to the final EIR's implication at 7-182, the City of Carson supports the extension of Lomita; attached as Exhibit "A" is memorandum setting forth the City's position. Also attached, as Exhibit "B" is a more detailed accounting of numerous technical problems and questions with regard to the access proposed by the final EIR and other responses to comments.

"Significant A" impact for portions of Watson Corporate Center property contiguous to the Alameda Corridor, which must be mitigated both during construction and permanently. Noise mitigation barriers such as soundwalls and landscaping (as proposed for the west side of the Corridor in this vicinity) are essential. With respect to vibration impacts, we believe that mitigation measures such as those discussed for residential areas (use of low-vibration frogs for switching or ballast mats) must be included for sensitive uses within 200 feet of the Corridor.

Once again we stress that the above described unmitigated impacts must be dealt with prior to proceeding if the project approvals are to withstand legal challenge.

Very truly yours,

Pilar M. Perry

Pilar M. Perry
Vice President
Public Affairs

Attachments: 2 (PREVIOUS COMMENTS ON DEIR)

PMP/cs

Watson Land Company

(1) Access to the 62 acre site south of Lomita Boulevard will be provided from the west along an extended and improved Lomita Boulevard. The Alameda Corridor Transportation Authority is working with the Cities of Los Angeles and Carson to improve Lomita Boulevard to provide access to adjacent parcels. It is not practical or feasible to grade separate the Corridor and an extended Lomita Boulevard connection to Alameda Street. Projected growth in train movements from the consolidated corridor will preclude the feasibility of providing access through a grade crossing at the current private crossing location. Access from the west is therefore the only feasible alternative.

(2) Noise and vibration levels were projected for all sensitive land uses along the proposed alignment. The project noise criteria and definitions of sensitive land uses are described in Section 4.4.2 of the FEIR. The vibration criteria are described in Section 4.5.2 of the FEIR. Light industrial and vacant land uses are not considered noise or vibration-sensitive and no noise or vibration impact was assessed for these land uses.

5.6 PUBLIC HEARING COMMENTS AND RESPONSES

Carl Robinson
Representing Congressman Tucker

Comment 1: I am concerned that the project does not consider the recommendations of the Compton City Council. The congressman has written a letter to ACTA requesting respect of the Council's rights and wishes.

Response: Please see the response to the City of Compton's written comments.

Comment 2: I am concerned that emergency right-of-way necessary to ambulances and the fire department will be restricted by the project.

Response: Emergency access across the Corridor will be greatly improved compared to existing conditions. Delays that are now occurring because of trains stopping or moving slowly along Alameda Street would be eliminated.

Omar Bradley
Mayor, City of Compton

Comment 1: The City put forth six points that if followed would benefit not only the City of Compton but the Corridor as well. That the trains be depressed has been agreed upon; however, it is also very important that the trench be covered. If it is not covered, you will be forced to create a wall that will divide us.

Response: Please see the response to the City of Compton's written comments.

Comment 2: The project would create a situation in which emergency vehicles (ambulances, fire trucks and police) would have only a few avenues of intersection. The City cannot support a plan that would limit emergency service access.

Response: Emergency access (and general access) across the Corridor should be greatly improved compared with existing conditions under which at-grade trains conflict with vehicular and pedestrian movements.

Harold Cebrun
Superintendent, Compton Unified School District

Comment 1: I have never been contacted, neither has the state administrator about anything associated with this particular project.

Response: Parties having an interest in the project were sent copies of the EIS through a direct mailing (the City of Compton's ACTA representatives and others being included), and through newspaper advertisements and other public notices. In

addition, the ACTA Governing Board was apprised of the issuance of the EIS. The City of Compton has a member on that Board.

Comment 2: While there are Los Angeles schools on this map, I see no Compton Unified School District schools listed on the trail. I am providing a map for the record, that shows the Compton schools.

Response: All current public and private schools within the project study area are identified in the EIS, including the Compton Unified School District. Please see EIR Section 5.5 and EIS Section 4.7.10.

Comment 3: I have several questions regarding the proposed Alameda Corridor, including some that reflect the Compton Unified School District's concerns.

Response: Mr. Cebrum entered a list of questions and comments into the record. These questions and comments are addressed in the responses to written comments.

Captain Steve Roller
Compton Police Department

Comment 1: I am concerned that the EIR does not address mitigation for the City of Compton other than in broad terms. Law enforcement will be impacted in two phases of construction. The City's law enforcement resources are on the west side of the project; and I am concerned that emergency law enforcement services required on the east side will be delayed by any changes in traffic patterns caused by construction. This issue was not addressed.

Response: Impacts associated with emergency vehicle access, including law enforcement, are discussed in EIS Sections 4.7.10 and 4.7.11.

Comment 2: I am concerned about the depressed trainway through Compton. The trench will pose significant safety problems for law enforcement officers. It will limit access to pursuing suspects, evidence and addressing other potential problems in the trench. I am concerned about the safety of officers. I am also concerned about delays in access because law enforcement will have to use a work road and may have problems opening the gate.

Response: Access across the depressed trainway will be improved compared to existing conditions, and therefore officer safety should not be adversely affected. The effects of the proposed project on law enforcement are discussed in EIS Section 4.7.10. The appropriate means of access for purposes of apprehending suspects will be developed in consultation with local law enforcement officials.

Comment 3: I am concerned about inquisitive children entering the tunnel as they cross bridges and access roads.

Response: The bridges across the depressed trainway and the east and west barrels of Alameda Street will have the same configuration as the existing street system in the area, with the exception that the edge of the trainway will be protected by means of chain link fencing. Access into the trainway itself will be controlled and will be limited to a small number of access points that will be gated. These provisions should provide adequate protection from unwanted or accidental access into the trainway.

Comment 4: I am concerned about the potential for graffiti created by any walls built for the project. What mitigation is proposed to address this problem?

Response: An above-ground wall is not proposed along the Corridor, but rather a short concrete barrier, about 36-42 inches in height, on top of which would be placed some form of open fencing, extending to a combined height of approximately 8-10 feet. There would also be solid surface noise barrier walls (8-10 feet in height) that would be constructed at several locations. Wherever above-ground wall surfaces are constructed, methods to achieve resistance to graffiti will be used, such as graffiti-resistance paint, textured wall surfaces, and in some locations the use of landscaping materials.

Comment 5: I am concerned about law enforcement's ability to deal with consequences of increased truck and vehicular traffic on Alameda as a result of the project.

Response: Traffic projections along Alameda Street, with the four lane street configuration, would be the same with or without the proposed project, and would be characterized as normal background growth in traffic. Traffic control and other law enforcement implications associated with this growth in traffic would similarly occur in the absence of the proposed project and therefore would be provided for in accordance with normal law enforcement planning and practice.

Comment 6: I think that completely enclosing the trainway through certain areas, such as Compton, should be considered and I think that an alternative to truck traffic on Alameda should be considered.

Response: Please see the response to the City of Compton's written comments.

Comment 7: I think that the Alameda Corridor Transportation Authority should seek law enforcement input, particularly from the Compton Police Department.

Response: The input of local law enforcement has been solicited in the past and continues to be sought by the planning and design personnel who are developing the project.

John Schlotterbeck
Representing the City of Compton

Comment 1: I am distressed that potential alternatives, which might mitigate all of the impacts objected to by the City of Compton, have essentially been ignored during the environmental review process. The alternative that Compton has repeatedly suggested is depressing both the roadway and railway and covering the trench. This would meet all of the objectives of the project and create a truly consolidated corridor.

Response: Please see the response to the City of Compton's written comments.

Comment 2: I feel the conclusion of the public review process for this project should be postponed due to the fact that additional studies are still being released that may produce information relevant to reviewing and judging this project.

Response: FHWA granted an extension of time, for an additional 14 days, to the City of Compton. The studies referenced in the comment are not a part of this environmental document. Refer to Appendix H for the *Compton Truck Tunnel and Rail Cover Review* (DMJM/M&N, 1995).

Joseph Wang
City Engineer, City of Lynwood

Comment 1: One issue of concern to the City of Lynwood is that the drawings in the new report do not show a crossing at Butler Avenue. It is important for Lynwood to have this crossing.

Response: Concept plans do not include a highway crossing at Butler Avenue since there is no existing rail grade crossing at that location. It was therefore not included in the analysis and is not a part of the Alameda Corridor Project. The City of Lynwood may wish to develop additional crossings as separate projects.

Comment 2: The report does not mention who is responsible for building the much needed on- and off-ramp at Imperial Highway and Alameda. The ramps are very important to the city and should be included in this project.

Response: The referenced ramp connections to the I-105 freeway were originally considered during the design of the freeway, but were subsequently eliminated. Caltrans should be contacted regarding your concern. The ramp connection is not needed to permit operation of the Corridor.

Comment 3: I am concerned about the fire department being able to serve both the city and the project. I think that the water line should be extended from Butler to Fernwood to ensure adequate fire protection for the area.

Response: See response to written comment Dal Howard, City of Los Angeles Fire Department.

Comment 4: I am concerned that, while the report states parking spaces will not be reduced, it does not mention that parking spaces will be added, which will be necessitated by the project.

Response: The project will reconstruct east and west Alameda Street, within their existing cross sections, including sidewalks and on-street parking, where permitted. Reductions in parking spaces are discussed in the EIR. No new parking spaces would be needed for the proposed project, and therefore, will not be provided.

Comment 5: The project includes improvements to the east side of Alameda; however, the improvements should include not just the street but also the sidewalks.

Response: See previous response.

Comment 6: I think tree planting along the corridor would aid in mitigating air pollution impacts caused by the project.

Response: Please see the response to the same comment appearing in the City of Lynwood's written comments.

Comment 7: A final issue I would like to raise is that it is important that economic growth benefits the corridor cities--during construction and after. I think there should be more of a concrete plan to involve local residents in training and employment opportunities.

Response: See response to comment 3, Emily Hart-Holifield.

Herbert Arceneaux

Comment: Because the project has not started, you can still make this project something we can be proud of rather than something we have to go around.

Response: It is the intention of the project's sponsors to design and construct a project that will be accepted by all those involved, including the communities through which it will pass.

Yvonne Arceneaux

Comment: The City of Compton is pressing forward with the resolution (supporting a covered depressed train- and truckway) passed by city council in September.

Response: Please see the response to the City of Compton's written comments.

Gwendolyn Bouffard

Comment 1: As a youth director of the Citizens Design Baptist Church, I know youth and that the trench as well as the surrounding wall will be a magnet for them.

Response: The safety of pedestrians in general, and school children in particular, should be greatly improved by the Corridor, since it will completely eliminate existing conflicts between at-grade trains and both vehicular and pedestrian activity. The vehicular barrier and associated fencing along the corridor will prevent undesired entry into the depressed trainway.

Comment 2: The noise and air pollution resulting from the project are a concern.

Response: Noise impacts are discussed in EIS Section 4.7.3. Air quality impacts are discussed in EIS Section 4.2.

Sydney Bowen

Comment: I would like to state that I am in strong agreement with many of the other speakers that the trench through Compton should be covered.

Response: Please see the response to the City of Compton's written comments.

Alfonso Cabrera

Comment: I would like to be on record stating that the 100 Strong Men would like to have the trench covered.

Response: Please see the response to the City of Compton's written comments.

Roy Coleman

Comment: I would like to know if it is possible to reconsider the project given the great impact it will have on Compton. I am concerned about the economic problems associated with the project; the noise problems from running over 1,000 trains a day; the noise and fumes from truck traffic; the potential for more accidents; and the problems associated with the trains carrying excavated earth.

Response: For economic effects, please see EIS Section 4.7.13. There will be approximately 100 trains per day in the year 2020, not 1,000. For a discussion of noise impacts, please see EIS Section 4.7.3. For a discussion of air quality impacts, please see EIS Section 4.2. For a discussion of construction impacts, including those associated with excavation, please see EIS Sections 4.4, 4.5 and 4.7.2. The proposed project will lessen noise, fumes, and accidents related to railroad traffic. It should also be noted that the project supports the ongoing trend to shift goods movement from trucks to trains, which would also have beneficial effects related to truck-induced impacts.

Ellis Cooke

Comment 1: I am concerned that some kind of wall will be required to provide safety around the trench.

Response: An above-ground wall is not proposed along the Corridor, but rather a short concrete barrier, perhaps 36-42 inches in height, on top of which would be placed some form of open fencing, perhaps extending to a combined height of 8-10 feet.

Comment 2: I am concerned that there will be a large increase in truck traffic as a result of this project.

Response: Please see the responses to Fred Cressel's comments.

Comment 3: I would like to see a depressed train- and truckway as well as a cover over the trench. This would solve a lot of problems.

Response: Please see the response to the City of Compton's written comments.

Mr. Cortez

Comment 1: Some of us in Compton do not feel that we are inconvenienced by this project.

Response: The commentor's position regarding the project is noted for the record.

Comment 2: If the project creates jobs, I would like to see the local residents benefit.

Response: The need to attempt to use local labor for construction of the project continues to be recognized. Please also see the response to Emily Hart-Holifield's comments.

Fred Cressel

Comment 1: I am concerned that while environmental conditions may improve overall as a result of the project, conditions will deteriorate in Compton and this fact is not being acknowledged. I am also concerned that the project will attract traffic from many other communities and route it through Compton.

Response: The effects associated with the proposed project, including those which may affect Compton, are discussed throughout the EIS. When completed, the project would have a beneficial effect in Compton, based upon the information presented in the EIS. Insofar as traffic is concerned, expected future traffic levels would be associated with growth in background traffic, not traffic associated with the ports.

Comment 2: I am concerned that traffic approaching the 91 Freeway on Alameda from the ports will stay on Alameda and not enter the Long Beach Freeway. I am concerned because I feel the improvements planned for Alameda as part of this project make Alameda an attractive freeway alternative.

Response: The proposed street improvements along Alameda Street consist of reconstructing the existing number of lanes and rail crossings. Added to this would be left turn pockets where needed to improve turning movements and improved and coordinated signalization. These improvements would not produce travel speed savings great enough to cause traffic otherwise destined to use the freeway to be attracted to Alameda Street instead. Traffic analysis conducted for the project has concluded that the proposed project would not be an attractive alternate for port-related trucks, and also would not draw traffic away from the I-110 or I-710 freeways.

Comment 3: How much is this project going to cost the individuals who live and work in Compton?; how long will business be disrupted?; how much is it going to cost in property value?

Response: No direct cost to individuals will be incurred to implement the project. Funding will be forthcoming from a variety of federal, state and local sources, including the sale of bonds and fees to the users. There will be inconveniences that will occur during construction of the project, but these are not anticipated to require costs to be borne by residents of the area; businesses could experience some temporary losses. There should be no losses in property value.

Charlene Diggs

Comment: Has ACTA provided to any school district or community college district information about the jobs that are going to be available from this project?

Response: Please see the response to Emily Hart-Holifield, Comment 3. No contacts have been made regarding construction employment as of the present time.

Vernice Dredd

Comment 1: I am concerned about the economic consequences of the project. I am concerned about the impact a high wall will have on businesses. I am afraid it will deter economic growth in Compton.

Response: Please see the response to Ellis Cooke's first comment.

Comment 2: I am concerned that in Compton there is not enough dissemination of information on jobs that will be available with this project. The schools have not been contacted about the types of training that may be needed.

Response: See response to comment 3, Emily Hart-Holifield.

Comment 3: If the project goes ahead as planned, cutting the city in half, Compton will be destroyed.

Response: Access across the Corridor will be greatly improved compared with existing conditions.

David Gomez

Comment: I would like to know what plans there are to maintain Alameda after the project is in place. What will it look like? Right now Alameda is not a pretty street at all.

Response: Because existing at-grade train activity will be placed below grade by the proposed project, it is expected that the appearance of the Corridor would be more open and therefore would be improved. Contributing to this expected improved appearance would be reconstruction of the street and its related features. Please see EIS Section 4.7.12 for more information.

Emily Hart-Holifield

Comment 1: Because Compton is the city most affected by the project, this hearing should have been held there.

Response: The public hearing was held in a central location in order to facilitate access to interested parties along the Corridor's 20-mile length. Previously, during the CEQA process, Compton was afforded a public hearing in its own City Hall. In addition, five other public hearings were held during that process, at several locations along the Corridor.

Comment 2: How many of the commissioners who sit on the ACTA Board live in or near Compton?

Response: Compton has one representative on the ACTA Governing Board.

Comment 3: I am concerned that Compton residents will not get any of the jobs this project will generate. I would like to know how many jobs you have targeted for minorities; and I would like to have descriptions of and qualifications for the jobs that will be available.

Response: A draft report on *Employment, Construction Supplies and Materials,* a summary of the economic opportunities afforded by the Alameda Corridor construction, was prepared by ACTA and its consultants and distributed to the public at recent ACTA board meetings and other public meetings related to the Alameda Corridor. The report identifies over 10,000 construction related jobs and outlines specific job opportunities by classification. It is hoped that the information will afford those involved in job training and placement the time to position qualified workers to take advantage of this opportunity.

Reverend Lewis

Comment: I would like to request that the depressed trainway be covered.

Response: Please see the response to the City of Compton's written comments.

Fred Parker

Comment 1: I am concerned about the 4,000 trucks going down Alameda.

Response: Truck traffic which will use Alameda Street in the future will be subject to growth in background traffic and not as a direct result of the Corridor. Please see EIS Section 4.7.9 for a discussion of traffic impacts.

Comment 2: I represent the businesses; so the thing I want to know, will there be access roads to the businesses in Compton.

Response: The street configuration in the City of Compton, including streets paralleling and crossing the Alameda Corridor will be just as they are today. The existing street configuration will be restored as part of the proposed project.

Ralph Prince

Comment: I have a number of concerns about the open depressed trainway that will pass through Compton. The trench will cut the city in half. I'm concerned about maintaining access on each of the east/west streets across the trench, especially for emergencies and to keep the business community working. Another concern is the walls that will border the trench. I am concerned that the walls will be a magnet for graffiti. A final concern is that the trench presents a major safety concern, especially to young people who may be tempted to play in it.

Response: The number of opportunities to cross the Corridor will be the same as today; however, delays currently caused by trains will be eliminated. For a response to the wall portion of the comment, please see the response to Ellis Cooke's first comment. For a discussion of safety considerations, please see EIS Section 4.7.11.

Newton Prothro

Comment: The City of Compton is worth about $2 billion and it is one of the most opportune places in the state to develop a business. ACTA is going to build this corridor above ground which will be detrimental to our business development potential.

Response: Please see the response to the City of Compton's written comments. The project could include a below-grade trainway, not an above-ground facility.

Gladys Russell

Comment 1: I would like to repeat Ms. Holifield's comment that this meeting should have been held in Compton, since the project affects Compton much more than any other Corridor city.

Response: Please see the response to Mrs. Holifield's comment.

Comment 2: I would like to say that Compton does not want an uncovered depressed trainway. We want it covered.

Response: Please see the response to the City of Compton's written comments.

Marjorie Ship

Comment 1: I think the project, as it is planned now, would be very damaging to the safety of the school children of Compton.

Response: Safety of school children and other pedestrians should be greatly improved by the Corridor, since it will eliminate existing at-grade conflicts with trains.

Comment 2: Why wasn't this meeting held in Compton? If it were, it would have drawn more residents from Compton.

Response: Please see the response to Emily Hart-Holifield's first comment.

Comment 3: I am concerned that emergency vehicles will have difficulty getting from one side of Compton to the other.

Response: Emergency access (and general access) across the Corridor should be greatly improved compared with existing conditions under which at-grade trains conflict with vehicular and pedestrian movements.

Comment 4: I agree with the suggestion that the trench should include a truckway.

Response: Please see the response to the City of Compton's written comments.

Essie Spellman

Comment 1: I would like to see a cover put over the depressed trainway and include trucks in the trench.

Response: Please see the response to the City of Compton's written comments.

Comment 2: I am concerned that the community will not be offered jobs created by this project; workers from outside the community will be employed. The community needs employment opportunities and training centers.

Response: Please see the response to Emily Hart-Holifield, comment 3.

Ulysses Terry

Comment: The 200 block clubs in the City of Compton have agreed that the trench through Compton needs to be covered and that the trench needs to include a truckway.

Response: Please see the response to the City of Compton's written comments.

John Thirkill

Comment: I own real estate on Pacific Coast Highway near Alameda, which I understand will be taken for this project. I would like a time schedule to know when these properties will be taken.

Response: The property referred to in the comment would not be acquired for purposes of the Alameda Corridor. It could be involved, however, in a planned grade separation along Pacific Coast Highway, which is a related project being sponsored by Caltrans. The commentor should contact Caltrans for further information about that project.

Walter White

Comment: I attended a seminar last year discussing the types of jobs that would be available for this project. When I requested a packet from the seminar I was turned down because I was not an official representative--as a citizen I could not have the packet.

Response: The commentor appears to be referring to a seminar conducted by the Port of Long Beach, the subject of which was career opportunities in the maritime industry and not the proposed project.

Jardine Wilson

Comment 1: The project would be acceptable if the trench were covered and included both a truckway and a trainway.

Response: Please see the response to the City of Compton's written comments.

Comment 2: I have never seen where the Alameda Corridor Committee has acknowledged the resolution that was unanimously passed by Compton City Council (regarding a covered trench alternative through the City).

Response: Please see the response to the City of Compton's written comments.

Comment 3: I am concerned about the validity of your cost estimate of City of Compton's proposal. The City's consultants determined the cost to be much lower.

Response: In response to comments from the City of Compton, the ACTA Governing Board requested that staff and its consultants conduct a further study of the Compton truck tunnel and rail cover proposal. This study first defined the Compton proposal and investigated options for reducing the cost of the proposal. The redefined project cost was estimated at $260 to $270 million. The truck and rail tunnels would require a number construction elements not required for the Alameda Corridor Project including tunnel ventilation and operations systems. The project would also result in significantly greater construction impacts.

APPENDICES

Appendix A
Bibliography

Appendix A
Bibliography

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Appendix B
Glossary

Appendix B
Glossary of Terms

Abutment	A surface or mass provided to withstand thrust; for example, end supports of an arch or bridge.
Alameda Corridor	A consolidated, grade-separated railroad link between the ports of Los Angeles and Long Beach and the regional and national rail systems, coupled with a reconstructed Alameda Street.
Aquiclude	A porous formation that absorbs water slowly but will not transmit fast enough to furnish an appreciable supply for a well or spring.
AQMP	Air Quality Management Plan
ARB	Air Resources Board
ATSF	Atchison, Topeka and Santa Fe (Railroad)
Bent	A framework support transverse to the length of the structure.
Break Bulk	A type of cargo, such as fruit, bagged grains and other food products, typically moved on pallets.
BTEX	(benzene, toluene, ethylbenzene, xylene)
CARB	California Air Resources Board
Carcinogen	Any agent that incites development of any type of malignancy (cancer).
CCAA	California Clean Air Act
CAAQS	California Ambient Air Quality Standards
cfs	cubic feet per second
CDFG	California Department of Fish and Game
CIDH	cast-in-drilled-hole (method)
cm	centimeter
CMP	Congestion Management Plan
CNDDB	California Natural Diversity Data Base
CNEL	community noise equivalent levels

dBA	A-weighted decibel sound level; the A-scale more closely approximates the range of sensitivity of the human ear to sounds of different frequencies.
Decibel	A unit for describing sound intensity.
Diamond	A crossing structure consisting of four connected frogs.
DMJM	Daniel, Mann, Johnson & Mendenhall, Inc.
Double Main	Two main tracks, in which one track is typically specified for traffic in a specific direction. (However, for the Alameda Corridor, either track may be used for travel in either direction).
Dredging	The removal of solid matter from the bottom of a water body.
Drill Track	A track connecting with a lead or ladder track, over which locomotives and cars move back and forth in switching. A drill track is typically used for local, rather than long haul, service.
Dry Bulk	Dry cargo shipped without a package or container, such as coal and petroleum coke, salt and other minerals, scrap metal, etc.
Ecosystem	A functional system which includes the organisms of a natural community together with their environment.
EIR	Environmental Impact Report
EIS	Environmental Impact Statement
Extirpated	Removed completely; destroyed.
FEMA	Federal Emergency Management Agency
FHWA	Federal Highway Administration
FIP	Federal Implementation Plan
FRA	Federal Railroad Administration
Frog	An assembly of rigid rail at a turnout or crossing, directing the railroad wheels across a break in the running surface where a rail with a different alignment crosses; used in pairs at crossovers.
FY	fiscal year
gm	gram

Grade Crossing	The intersection of roadways, railways, pedestrian walks, or combinations of these at the same grade or elevation.
ha	hectare (1,000 square meters)
Holding Track	A track on which cars are held awaiting disposition.
ICTF	Intermodal Container Transfer Facility
Industrial Lead	A track serving an industrial area, with numerous tracks branching off.
Interlocking	An arrangement of signals and special track work where rail routes meet, including turnouts and crossovers. Tracks are connected in such a way that movements from one track to another can only be made safely and in a specified sequence, preventing opposing or conflicting train movements. Interlockings occur at the crossings of two railroads, at junctions, or upon entering or leaving terminals or yards.
Intermodal Yard	A yard used for the transfer of containers between railroad flatcars and flat-bed truck (trailer/semitrailer) chassis; or for loading/unloading highway trailers or semitrailers onto/from flatcars.
ISC2	Industrial Source Complex (model)
ISTEA	Intermodal Surface Transportation Efficiency Act
Jointed Rail	Tracks made up of short segments of rail which are bolted together.
Junction	A point at which a branch line connects with a main line track; or where a track connection is provided between two main line or two branch line tracks.
kg	kilogram (1,000 grams)
km	kilometer (1,000 meters)
l	liter
LACDA	Los Angeles County Drainage Area
LACFCD	Los Angeles County Flood Control District
LACMTA	Los Angeles County Metropolitan Transportation Authority
LACTC	Los Angeles County Transportation Commission

Ladder Track	A track with numerous turnouts leading to a parallel yard tracks; often a yard will have a ladder tracks at both ends, for improved access.
Landbridge	An intermediate transcontinental rail link between port cities in an intermodal container movement involving two ocean crossings.
Leq	daytime energy equivalent level
Light Rail Transit	Light capacity rail rapid transit involving the movement of single passenger cars and short trains operating on electrical power from overhead wires. Light rail lines typically use surface private rights-of-way with highway crossings at grade, and/or subway-surface streetcar operation.
Liquefaction	A change in the phase of a substance to the liquid state. In geology it refers to the tendency of some water-saturated sandy or silty soils to assume some of the characteristics of a liquid and suddenly become unable to support a load.
Main Track	A track extending between stations and through yards, on which trains are operated by train order or time table, or on which movements are governed by signal indication.
m	meter
m^2	square meters
m^3	cubic meters
MFA	Myra L. Frank & Associates, Inc.
M&N	Moffatt & Nichol Engineers
metric tonne	1,000 kilograms
Metrolink	Passenger rail service implemented and operated by the Southern California Regional Rail Authority in the Southern California region.
$\mu g/m^3$	micrograms per cubic meter
MIS	Major Investment Study
ml	millileter (1,000 liters)
MPO	Metropolitan Planning Organization
NAAQS	National Ambient Air Quality Standards
NDDB	Natural Diversity Data Base

Neobulk	A type of cargo, such as iron, steel, forest products or automobiles, shipped in large or heavy units like roils or coils.
NOI	Notice of Intent
NPDES	National Pollutant Discharge Elimination System
NS	No Standard
OCP	overland common point: A term used on the U. S. West Coast to designate destinations east of the states of Montana, Utah and Arizona, where transport rates are reduced to enable the West Coast carriers to compete with the Atlantic and Gulf Coasts.
PAC	Ports Advisory Committee
PCE	polychloroethene
PCH	Pacific Coast Highway
PM_{10}	particulate matter less than 10 microns (μ) in diameter
ppm	parts per million
pphm	parts per hundred million
Railroad Grade Separation (railroad bridge over trench)	The short railroad bridge constructed over the below grade (depressed) trainway. The bridge may carry a branch line or industry lead trainway railroad track over and past the trench.
Railroad/Highway Grade Separation	A crossing of railroad tracks, usually the Corridor over a highway or city street. In the case of the Corridor passing over the Terminal Island ramps (SR 47), this shall have the same meaning as an "underpass" structure in accordance with Caltrans standards.
Reverberation	The prolongation of sound at a given point after direct reception from the source has ceased, due to such causes as reflections from bounding surfaces.
Road Switcher	A locomotive used for through or main line movements, often in multiple with other similar units. A road switcher may also be used to do work along branch lines.
ROG	reactive organic gases
RTIP	Regional Transportation Improvement Program

Runaround Track	A running track kept clear to allow the movement of equipment from one end of a yard to the other.
SCAB	South Coast Air Basin
SCAG	Southern California Area Governments
SCAQMD	South Coast Air Quality Management District
SCRRA	Southern California Regional Rail Authority
Severe	In the context of noise impacts, when a project-related noise impact exceeds a community noise exposure level (CNEL) value of 72 dBA.
Siding	An auxiliary track to the main track, used to allow the meeting or passing of trains.
Significant	1) In the context of noise impacts, when a project-related noise impact exceeds a community noise exposure level (CNEL) value of 67 dBA and the project-related noise level is greater than existing or future No Project levels by a perceptible amount. 2) As defined by the California Environmental Quality Act (CEQA), a substantial or potentially substantial adverse change in any of the physical conditions within the area affected by the project.
SIP	State Implementation Plan
SOPA	Society of Professional Archaeologists
Sound Walls	Vertical barriers that are placed between a source of noise and a potential receiver of that noise, resulting in a reduction of the level of noise that would otherwise be experienced.
SP	Southern Pacific (railroad)
Species	A taxonomic category including closely related, morphologically similar individuals which actually or potentially interbreed.
SPTC	Southern Pacific Transportation Company
Spur	A section of track connected only at one end to a main track, i.e., a stub-ended siding.
SR	State Route
Storage Track	A track on which cars are placed when not in service.

Street Grade Separation	A relatively long roadway crossing either over or under the Corridor and other tracks. The structure will carry vehicles and pedestrians past the track areas. In the case of the Pacific Coast Highway (US 1) crossing, this shall have the same meaning as an "underpass" or "overhead" structure in accordance with Caltrans standards.
Street Overpass of Depressed Trainway	The short roadway bridge constructed over the below grade (depressed) trainway. The bridge will carry vehicles and pedestrians across the trench at the various city streets where a crossing is provided.
Substantial	Considerable in quantity or degree; exceeding established thresholds pertaining to adverse effects defined by quantity or degree; similar in concept to the definition of significant under CEQA. The term substantial, as used in this EIS, has equivalent meaning to the term significant in the EIR, when referring to impacts or adverse effects.
SWPPP	Storm Water Pollution Prevention Plan
SWRCB	State Water Resources Control Board
Tail Track	A turnout in which access to the siding is via a trailing point switch (whose points face in the direction in which the train is moving), such that trains must be backed in.
Tangent Track	A straight section of track, as opposed to curved track.
TCM	Transportation Control Measure
Team Track	A track owned by a railroad, and used to spot cars for customers who do not have an industrial spur available to them; often provided with a platform for the transfer of freight between box cars and highway trucks.
TEU	approximately 25 million metric tonnes (28 million tons) of cargo
Through Train	A train which neither stops at intermediate stations nor does switching work en route.
TOFC	Trailers On Flat Cars; Intermodal operation of containers mounted on highway chassis, the combination being mounted on flat cars, like highway trailers.
Tower	A building located along a rail right-of-way, at a junction crossing, terminal or yard, permitting maximum view of the tracks and used by a yardmaster, switch or block operator, or dispatcher.
Train	A locomotive, with or without cars.

Trainway in Tunnel Section	A crossing of the Corridor where the trench structure is covered (i.e., a crossing of a street, where the crossing is too long to be considered for a bridge). Either tunnel sections or street overpass will be constructed, depending on the detailed design.
Turnout	A switch and accompanying section of track allowing the diversion of rolling stock from one track to another.
Unit Train	A train transporting a single commodity from one source (shipper) to one destination (cosignee); the integrity of unit trains is maintained after unloading at the destination, and empties (still coupled in the same order) are returned for subsequent loading.
UPRR	Union Pacific Railroad
US1	U.S. Highway 1 (a.k.a. Pacific Coast Highway)
USACOE	U.S. Army Corps of Engineers
USF&WS	U.S. Department of the Interior, Fish & Wildlife Service
Vibration	A cyclic motion of the particles of an elastic body or medium in alternately opposite directions from the position of an equilibrium when that equilibrium has been disturbed.
VMT	vehicle miles of travel
VOC	volatile organic compound
Welded Rail	Tracks made up of short segments of rail which are connected by means of welding rather than bolted joints. Also referred to as "continuously welded track."
Wye	Tracks forming the letter "y" with a connector across the top, and used for turning equipment in a reverse direction where no loop or turntable is available; a wye may also occur where a branch line approaches a main line from only one direction.
Yard Engine	A small locomotive, used for switching cars in yards and terminals.

Appendix C
List of Preparers

Appendix C
List of Preparers

Federal Highway Administration

Mary Gray. M.S. Civil Engineering, Stanford University. Transportation Engineer/Project Manger. 15 years experience in transportation planning.

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Richard J. Starzak. M.A. Architectural History, UCLA. Cultural Resources. 16 years experience preparing historic/architectural/cultural resource studies.

Michael S. Lott. B.A. Geography/Ecosystems with Emphasis in Natural Resources, UCLA. Hydrology, Water Quality, Vegetation and Wildlife. 5 years experience in conducting natural resources impact studies.

Ben Kohlmeyer. B.S. Political Economy of Natural Resources, University of California at Berkeley. Hazardous Materials. 1 year experience in preparing environmental documents.

Linda Weston. B.S. Engineering and Applied Science, Yale University. Technical Editor. 6 years experience in technical editing.

Brad Harris. B.S. Urban and Regional Planning, California State Polytechnic University at Pomona. Architectural research. 7 years experience in conducting architectural research.

Daniel, Mann, Johnson & Mendenhall /Moffat & Nichol

David Milner. B.S.C.E., University of New Haven. Project Manager and Senior Transportation Engineer. 23 years experience in highway and major public works engineering.

Robert Tomlinson. MSCE, Purdue University. MPA, USC. Senior Transportation Engineer. 37 years experience in civil, structural, highway and municipal engineering.

Wayne J. Mauthe, P. E. B.S. Construction, Bradley University. Senior Railroad Engineer. 14 years railroad-related engineering, design and construction experience.

Gavin J. Wong, P.E. B.S.C.E., UCLA. Project Engineer. 7 years experience transportation planning, design and construction experience.

Samir Noujaim, P.E. B.S.C.E., Senior School of Engineering, Beirut, Lebanon. Manager, Facilities Design. 35 years experience as a civil engineer in design, construction supervision and management.

Alameda Corridor Transportation Authority

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Katz, Okitsu & Associates

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Radian Corporation

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Michelle Wilhelm. Masters, Environmental Science, UCLA. Air dispersion modelling (CalLine/EMFAC). 3 years experience in air quality assessment and compliance.

Others

Larry Gallagher. Graphic artist. 30 years experience in commercial art.

Port of Los Angeles

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Port of Long Beach

Geraldine Knatz. Ph.D. Biological Sciences, USC. Environmental Project Review. 17 years environmental/ports planning.

Appendix D
List of Parties Receiving Copies of the EIS

APPENDIX D: PARTIES RECEIVING THE EIS

Parties receiving the Final EIS are indicated by an asterisk(*)

Federal Elected Officials*

Honorable Barbara Boxer
U.S. Senator

Honorable Diane Feinstein
U.S. Senator

State Elected Officials*

Honorable Martha M. Escutia
Assemblywoman, 50th District

Honorable Juanita M. McDonald
Assemblywoman, 55th District

Local Elected Officials*

Honorable Gloria Molina
Supervisor, First District
County of Los Angeles

Honorable Yvonne Brathwaite Burke
Supervisor, Second District
County of Los Angeles
Mr. Burke Roach, Deputy

Honorable Deane Dana
Supervisor, Fourth District
County of Los Angeles
Mr. Mitch Maricich, Deputy

Honorable Jim Cragin
Councilman, Gardena

Honorable Hal Croyts
Mayor, City of Lomita

Honorable Peter Fajardo
Councilman, City of Carson

Honorable Ronald Green
Councilman, City of Compton

Honorable Thomas E. Jackson
Councilman, City of Huntington Park

Honorable Jeffrey Kellogg
Councilman, City of Long Beach

Honorable Leonis C. Malburg
Mayor, City of Vernon

Honorable Rosario Marin
Councilwoman, City of Huntington Park

Honorable Michael Mitoma
Mayor, City of Carson

Honorable Phyllis E. Pappen
Councilwoman, City of Diamond Bar

Honorable Raul Perez
Councilman, City of Huntington Park

Honorable Paul Richards, III
Mayor, City of Lynwood

Honorable Richard Riordan
Mayor, City of Los Angeles

Honorable Jane Robbins
Councilwoman, City of Compton

Honorable Albert Robles
Mayor, City of South Gate

Honorable Marcine Shaw
Councilwoman, City of Compton

Honorable Rudy Svorinich
Councilman, 15th District
City of Los Angeles

Honorable Rita Walters
Councilwoman, 9th District
City of Los Angeles

Honorable Thomas Ybarra
Mayor Pro Tem
City of Vernon

Federal Agencies

Interstate Commerce Commission/Surface Transportation Board
Ms. Elaine Kaiser*

U.S. Environmental Protection Agency
Mr. David Farrel*
Mr. Bob Moyer
Mr. David Tomsovic*

U.S. Army Corps of Engineers
Mr. David Castanon
Ms. Cheryl Conner
Mr. John Gill*

U.S. Fish & Wildlife Service
Ms. Gail Kobetich*

State Agencies

Business, Transportation & Housing Department
Mr. Tom Dunphy, Secretary

California Air Resources Board*

California Coastal Commission*
Mr. Peter Douglas
Ms. Theresa Henry

California Regional Water Quality Control Board*

California State Fire Marshall
Mr. Emmett Cooper*
Mr. Paul Ditzen

Department of Fish and Game, Region 9*
Mr. Fred Worthley

Public Utilities Commission
Mr. Jesus Escamilla*
Mr. Thomas Hunt
Mr. Ken Koss
Mr. Jack Rich
Mr. Raymond Toohey

State Office of Historic Preservation*
Ms. Cherilyn Widell, SHPO
Mr. Hans Kreutzberg

Regional Agencies

Metropolitan Water District of So. Cal.
Mr. Richard Balcerzak
Ms. Laura Simonek*

Southern California Association of Governments (SCAG)*
Mr. Mark Pisano, Executive Director
Mr. Jim Gosnell
Mr. Alan Havens
Mr. Eric Roth

So.Coast Air Quality Management District*
Dr. James Lents, Executive Officer

San Gabriel Valley Council of Governments
Mr. Steve Sizemore*

Local Agencies and Jurisdictions

Alameda Corridor Transportation Authority*
Mr. Gill Hicks

Port of Long Beach*
Mr. Dan Allen
Ms. Dianna Connolly
Mr. Steve Dillenbeck
Mr. Ernie Flores
Mr. Steve Gleason
Mr. David Hauser
Ms. Geraldine Knatz
Ms. Carmen Perez
Mr. Einar Petersen
Mr. Mike Slavin

Port of Los Angeles*
Mr. Ralph Appy
Mr. Ezunial Burts
Mr. Arthur B. Goodwin
Mr. Dwayne Lee
Mr. Vernon E. Hall

Mr. Jim Preusch
Mr. Frank Sanchez
Mr. Jonathan Thomas
Mr. Gerald Swan

County of Los Angeles

- Department of Public Works
  - Mr. Ronald Ondrozeck*
  - Mr. Brian Sasaki*
  - Mr. H.W. Stone*
  - Mr. Randal S. Tsurutani
- Fire Department
  - Mr. James L. Corbett
  - Mr. P. Freeman
  - Mr. Paul H. Rippens*
  - Mr. Richard Schiehl
  - Mr. Richard Solis
- Regional Planning Department
  - Mr. Gene McKnight
- Sanitation Districts
  - Ms. Marie L. Pagenkopp*
- Sheriff's Department
  - Mr. Joe James

Los Angeles County Metropolitan Transportation Authority (LACMTA)
Mr. Bob Cashin
Mr. Victor Kamhi
Mr. Harley Martin
Ms. Audrey Nolan
Ms. Judith Wilson*
Mr. Franklin White

Los Angeles Unified School District
Ms. Joan Friedman*

City of Alhambra
Mr. Boyd G. Condie*
Mr. Julio Fuentes*

City of Azusa
Mr. Roy E. Bruckner*

City of Carson
Mr. Chris Getz
Mr. Larry Olson
Ms. Sherri Repp
Mr. George Schultz*

City of Compton*
Mr. Omar Bradley, Mayor
Mr. Howard Caldwell
Dr. Harold Cebrun
Mr. Terry Ebert
Mr. Gerry Gadt
Mr. John Johnson
Capt. Steve Roller
Mr. John D. Schlotterbeck
Mr. Monroe Smith

City of El Monte
Ms. Patricia A. Wallach, Mayor*

City of Huntington Park
Mr. Patrick Connoly*
Mr. Donald Jeffers
Mr. Mike White

City of Huntington Park (cont.)
Mr. Jack Wong

City of La Verne
Mr. Martin R. Lomeli*

City of Long Beach
Mr. John R. Calhoun
Mr. Dave Elder
Mr. Timothy Lee*
Mr. Robert Paternoster*
Mr. Ed Putz

City of Los Angeles
Ms. Rosalie Avery
Ms. Roslyn Carter-Phillips*
Mr. Ron Deaton*
Mr. Herbert Glasgow*
Mr. Tom Glick
Mr. Conn Howe*
Mr. Roy Kim
Mr. Donald Manning*
Mr. T.K. Prime*
Mr. Robert Yates*

City of Lynwood
Mr. Bert Cueva
Mr. Aubren Federson
Mr. Faustin Gonzales
Mr. Louis Heine*
Mr. Emilio Murga*
Mr. Gerald Wallace
Mr. Joseph Y. Wang*

City of Monrovia
Mr. Rod Gould*

City of Monterey Park
Mr. Ray Hamada*

City of San Gabriel
Mr. John E. Nowak*
Mr. P. Michael Paules*

City of Santa Fe Springs
Mr. John R. Price*

City of South Gate
Mr. Todd Argow*
Mr. Jim Biery
Mr. Ron George
Ms. Elizabeth Lefson

City of Vernon
Mr. David B. Brearley*
Mr. Gerald W. Forde*
Mr. Bruce Malkenhorst
Mr. Larry Spadt
Mr. Louis Rosenkrantz
Mr. Kevin Wilson*

City of Walnut
Mr. Robert P. Morganstern*

Private Organizations

ARCO Products Company
Mr. Abe Johnson*
Mr. Steven Krause

Automobile Club of Southern California
Mr. John Ziegler*

BNSF Railroad
Mr. Roy Ketring III*
Mr. Delbert Miller*
Mr. T. Shallin
Mr. R.M. Smith
Mr. Anthony Stapleton

Dominguez Seminary
Father Pat McPolin*

Dunbar Economic Development Corporation
Mr. David Henry

Jack Engle & Company
Mr. Paul Segal

GATX Terminals
Mr. Jim Higgins
Mr. J. Michael Martin

L.A. Junction Railway
Mr. Bill Edwards

San Gabriel Valley Commerce and Cities Consortium
Mr. Marco L. Brown*

Santa Fe Pacific Pipeline
Mr. Steve Tostengard

Barry M. Schram & Associates
Mr. Barry Schram

Shell Oil Company
Mr. Norman Vaughn*

Steptoe and Johnson
Mr. Samuel Sipe*

Southern Pacific Transportation Co.
Mr. Royce Green*

Texaco Inc.
Mr. Michael L. Kravitz*

Union Pacific Railroad
Mr. William Blank
Mr. A. Chacon
Mr. Gary Davidson*

Mr. Michael Kelly
Mr. Michael Whitcomb

Ventura-Lesbro Company
Mr. Galen Clifford

Watson Land Company
Ms. Pilar Perry*

Wilmington Chamber of Commerce
Ms. Lois Denzin

Wilmington Homeowners Association
Mr. Peter Mendoza

Interested Parties

Mr. Fred Anderson
Mr. Herbert Arceneaux*
Ms. Yvonne Arceneaux*
Ms. Gwendolyn Bouffard*
Mr. Sydney Bowen*
Mr. Alfonso Cabrera*
Mr. Roy Coleman*
Mr. Ellis Cooke*
Mr. Cortez*
Mr. Fred Cressel*
Ms. Charlene Diggs*
Ms. Vernice Dredd*
Mr. David Gomez*
Ms. Emily Hart-Holifield*
Mr. & Mrs. K.G. & M.C. Heath*
Mr. Cliff Lampman
Reverend Lewis*
Mr. Fred Parker*
Mr. Ralph Prince*
Mr. Newton Prothro*
Mr. Carl Robinson*
Ms. Gladys Russell*
Ms. Marjorie Ship*
Mr. Steven L. Soboroff
Ms. Essie Spellman*
Mr. Frank Stan*
Mr. Ulysses Terry*
Mr. John Thirkill*
Mr. William Ward*
Mr. Walter White*
Ms. Kathleen Whitlow-Anderson*
Mr. Jardine Wilson*

Appendix E
Summary of the Scoping Process

Appendix E
Alameda Corridor Project
Summary of Responses Received During the Scoping Period

NO.	COMMENTING PARTY	NATURE OF COMMENT	RESPONSE/LOCATION IN EIS
1	Roger Wilner Representing City of Vernon Verbal Comments From Scoping Meeting	• Written comments submitted on behalf of the City of Vernon regarding Alameda Corridor Project.	• See responses to the following three comments.
		• Written comments also submitted regarding Berth 136 Wharf extension, an unrelated project.	• Comment noted.
		• The project exists to mitigate the significant adverse impacts caused by the growth of the two ports.	• The purpose of the project is described in Section 1.4.
		• The portion of the study area between State Route 91 and 25th street should be a depressed trainway.	• As described in Section 2.3, the proposed project includes a depressed trainway between SR 91 and 25th Street.
2	Marcine Shaw Councilwoman, City of Compton Verbal Comments From Scoping Meeting	• Compton is not satisfied with responses to concerns previously raised.	• Additional information is provided in the EIS that may more fully address Compton's concerns.
		• A sufficient number of crossings over the corridor should be provided in the City of Compton.	• As described in Section 2.3, the proposed project includes crossings over the depressed railway at all existing railroad crossing locations, except Auto Drive South.
		• Information concerning relocation should be provided.	• See Section 4.7.8.
3	Ron Green Councilman, City of Compton Verbal Comments from Scoping Meeting	• The project will have a major impact within the Compton CBD.	• The effects in Compton would generally be beneficial. See appropriate topics.
		• Additional corridor crossings should be considered. Emergency response time could otherwise be adversely affected.	• See Section 2.4 for a list of corridor crossings added to the project.

Appendix E
Alameda Corridor Project
Summary of Responses Received During the Scoping Period

NO.	COMMENTING PARTY	NATURE OF COMMENT	RESPONSE/LOCATION IN EIS
	Ron Green (continued)	• The EIS should consider the impact of the proposed project on completion of the MC-5 project.	• The proposed project is designed to function with or without the MC-5 connection.
4	Fred Cressel Compton Chamber of Commerce Verbal Comments From Scoping Meeting	• A depressed truckway is favored by the City of Compton.	• A depressed truckway is not included in the preferred alternative because of substantial adverse right of way impacts. See Section 2.1.3.
		• Existing east-west traffic delays across Alameda Street are substantial.	• By providing grade-separated crossings at locations where east-west streets cross the corridor, delays would be reduced. See Section 4.7.9.
5	Ellis Cooke Resident of Compton Verbal Comments From Scoping Meeting	• Inquired as to how people would be protected.	• See Section 4.7.11, Safety and Security.
		• Provision should be made for truck traffic along Alameda so that east-west traffic would not be disrupted.	• Although no separate provisions for truck traffic are included in the project, the proposed grade-separated railroad crossings would improve east-west traffic.
6	Frank Stan City of Downey Verbal Comments From Scoping Meeting	• Downey is seeking assurance that it will not be adversely affected by this project.	• Because the proposed project is sufficiently removed from the City of Downey, substantial adverse effects would not result. Trains would be rerouted off the Santa Ana Branch.
7	U.S. Environmental Protection Agency Region IX 75 Hawthorne Street San Francisco, CA 94105-3901 Written Comments	• Specific comments were not provided; reference was made to comments made in response to the previous NOI.	• Direct consultation with EPA has been conducted. See Chapter 5.
		• Recommends coverage of a full range of alternatives and providing a detailed rationale for alternatives that have been rejected.	• See Chapters 2, 3 and 4.
		• Concern was expressed regarding the expected growth in truck traffic and attendant air quality implications.	• See Sections 3.2 and 4.2.

Appendix E
Alameda Corridor Project
Summary of Responses Received During the Scoping Period

NO.	COMMENTING PARTY	NATURE OF COMMENT	RESPONSE/LOCATION IN EIS
8	Metropolitan Water District of Southern California 1111 Sunset Boulevard P.O. Box 54153 Los Angeles, CA, 90054 Written Comments	• The MWD strongly objects to project alternatives 2.1A, 2.1S, and 2.2, due to potential significant costs and impacts on its water facilities (a number of facilities are noted in the letter).	• Further coordination will be undertaken with MWD to reduce problems associated with its facilities.
		• The MWD requests that the EIS assess the potential for impacts on MWD facilities and develop appropriate mitigation measures.	• Substantial adverse effects are not anticipated. All utilities will be relocated as necessary, in consultation with affected agencies.
		• The MWD requests preliminary prints of project plans in the area of its facilities be submitted for review and approval, and that a review fee also be submitted.	• The MWD will be furnished with project plans when they are available.
9	Los Angeles Unified School District P.O. Box 2298, Rm. 101 Los Angeles, CA, 90051 Written Comments	• The proposed project could cause adverse impacts on LAUSD schools, particularly related to the construction period, and therefore adequate mitigation needs to be provided to reduce such effects.	• See Chapter 4 for a discussion of mitigation measures that will be implemented during construction.
		• The previously prepared Mitigation Monitoring Program for the project is not specific enough for the needs of the LAUSD.	• The Mitigation Monitoring Plan is not a component of the EIS process. This document identifies mitigation measures specific to the preferred alternative that will be implemented. The project sponsors believe the LAUSD has adequately been accommodated through the proposed mitigation measures.
		• The EIS should consider air quality concerns related to LAUSD sites, including carbon monoxide hot spots and fugitive dust emissions from construction. Supporting mathematical calculations should be provided for review purposes.	• The air quality analysis has been reexamined and expanded where necessary to address Federal requirements. See sections 3.2 and 4.2.

Appendix E
Alameda Corridor Project
Summary of Responses Received During the Scoping Period

NO.	COMMENTING PARTY	NATURE OF COMMENT	RESPONSE/LOCATION IN EIS
	LAUSD (continued)	• Elevated noise levels caused by the project in the vicinity of LAUSD schools should be considered in the EIS. Mitigation measures should be provided. The analysis requirements of the LAUSD's "Recommended Components of a Noise Study" should be followed (attached to letter). The LAUSD seeks additional assurances that appropriate mitigation measures will be implemented.	• The EIS identifies noise impacts at schools in the project vicinity. No LAUSD schools are expected to be substantially affected by project generated noise. See Section 4.7.3.
		• The effects of ground-borne vibration on LAUSD schools should be addressed in the EIS. A soil analysis should be conducted for these schools within 400 feet of the trainway to determine if these schools would be adversely affected. Additional mitigation assurances are desired.	• See Section 4.7.4. No substantial groundborne vibration effects on schools are anticipated.
		• Traffic safety is a concern for students going to and from schools on foot. LAUSD has recommended mitigation measures to be considered regarding project related traffic effects (attached to letter). The use of buses to transport some students to school and crossing guards should be considered.	• The provision of grade-separated railroad crossings would improve the safety of students who walk to school across the corridor. See Section 4.7.11.
		• The environmental effects of hauling excavated material should be discussed in the EIS. Haul trucks should not pass in proximity to schools.	• The effects of hauling excavated material were previously discussed in the EIR and no additional effects are anticipated in the EIS.
10	City of Compton 205 S. Willowbrook Ave Compton, CA, 90220 Written Comments	• Alternatives should be considered in the EIS to include a) a completely depressed and covered trainway and truckway (through Compton), b) a depressed facility through the central portion of Compton and c) a depressed (not covered) facility through the entire city.	• Chapter 2 provides a discussion of the alternatives which were evaluated and rejected in favor of the proposed project. The options discussed in the comment are included in that category.

NO.	COMMENTING PARTY	NATURE OF COMMENT	RESPONSE/LOCATION IN EIS
	City of Compton (continued)	• The EIS should analyze the impacts on local traffic circulation and emergency response.	• See Sections 4.7.9 and 4.7.11.
		• The EIS should include plans to remove freight tracks within Willowbrook Avenue, between the north city limits and Greenleaf Boulevard.	• The requested MC-5 improvement is under the jurisdiction of the LACMTA; another agency.
		• Compton is opposed to overpass structures located within the city limits.	• The preferred alternative includes at-grade street crossings over the depressed trainway; no street overpass structures are proposed. See Chapter 2.
		• The EIS should analyze loss of on-street parking opportunity as a result of the project.	• The preferred alternative would not result in the loss of on-street parking spaces.
		• The EIS should examine the effects of the project on east-west traffic. No existing east-west streets crossing Alameda should be closed.	• See section 4.7.9 for the analysis of project traffic impacts. No existing east-west streets crossing Alameda would be closed (except Auto Drive South) and traffic along those streets would be improved as a result of grade-separated railroad crossings.
		• The EIS should include a system of pedestrian crossings over the project.	• The proposed grade-separated railroad crossings would provide for pedestrian crossings over the depressed railroad at sidewalks provided as part of the overcrossings.
		• The EIS should include a traffic signalization study specifically for Compton.	• The traffic impact analysis provided in Section 4.7.9 identifies adverse traffic impacts at one location within the City of Compton and mitigation for that impact. Improved signalization is proposed for Alameda Street as part of the preferred alternative.

NO.	COMMENTING PARTY	NATURE OF COMMENT	RESPONSE/LOCATION IN EIS
	City of Compton (continued)	• The EIS should include a land use impact study for all property within 5,000 feet of the project.	• All impact studies use a study area that extends the distance to which project impacts would be possible. Individual properties at a distance of 5,000 feet from the project site would not be subject to potential impacts.
		• The EIS should provide a parcel-level analysis for all parcels within Compton affected by the project.	• No property takings would be required in the City of Compton.
		• The EIS should examine the effects of the project on recreational opportunities within Compton.	• No recreational property located in the City of Compton would be adversely affected.
		• The EIS should include a fiscal impact analysis, addressing issues such as property values, business activity, jobs and compensation for business losses. A trust fund should be established to assist in economic revitalization.	• See Section 4.7.13. The project would primarily result in beneficial economic and fiscal effects to the City of Compton; a trust fund is not required to mitigate project impacts.
		• The EIS should provide a detailed analysis of public safety issues, including safety risks associated with train and truck traffic, mitigation measures to prevent accidents and emergency response provisions, a safety hazard evaluation related to cargo carried within the corridor, and mitigation measures to include retrofitting of structures for noise and vibration.	• See Sections 4.7.3 and 4.7.11 for discussions of noise and safety issues, respectively.
		• The Compton Fire Department will need additional equipment and the fire station located at 1320 Palmer Street will need to be relocated as a result of this project. The EIS should provide for these needs. The EIS should also analyze the effects on police services.	• The fire station at 1320 Palmer Street would not require relocation under the preferred alternative. Impacts on fire and police service are discussed in Section 4.7.10.

Appendix E
Alameda Corridor Project
Summary of Responses Received During the Scoping Period

NO.	COMMENTING PARTY	NATURE OF COMMENT	RESPONSE/LOCATION IN EIS
	City of Compton (continued)	• Negative air quality effects will be experienced by Compton, while regional benefits will be realized.	• Both regional and localized benefits would be realized. See section 4.2.
		• The EIS should examine the effects of the project on Compton's water and sewer system.	• No adverse effects on the water or sewer systems in the City of Compton are anticipated.
		• The EIS should include a plan for landscaping along the corridor, and the project should recognize the City's Architectural Review Board approval authority over soundwalls, landscaping and other structures to be built within the city.	• The proposed project would not result in adverse visual effects; extensive landscaping is not proposed. Soundwalls would not be required within the City of Compton under the preferred alternative. See Section 4.7.3. The authority of the City's Architectural Review Board over structures built within the City of Compton is noted.
11	City of Vernon 4305 Santa Fe Ave Vernon, CA, 90058 Written Comments	• The EIS should address two issues: (1) the project exists to mitigate the impacts of growth at the two ports, and (2) the portion of the corridor between SR 91 and 25th Street should be depressed.	• The purpose of the project is described in Section 1.4. As described in Section 2.3, the proposed project includes a depressed trainway between SR 91 and 25th Street.
		• Vernon believes the cost and time to construct the depressed trainway are overstated. Vernon also believes that the EIS should identify adverse impacts resulting from consolidation of all train traffic from the ports along the corridor.	• The preferred project includes a depressed trainway; costs and construction scheduling will be refined as the project's engineering proceeds. The environmental impacts discussed in Chapter 4 of this document identify impacts resulting from the consolidation of train traffic along the corridor.

Appendix E
Alameda Corridor Project
Summary of Responses Received During the Scoping Period

NO.	COMMENTING PARTY	NATURE OF COMMENT	RESPONSE/LOCATION IN EIS
12	ARCO Products Company 1801 E. Sepulveda Blvd. Carson, CA, 90749-6210	• Previously articulated concerns regarding the effects of the project on the ARCO refinery located at 1801 East Sepulveda Boulevard have not been adequately addressed.	• The Sepulveda Boulevard overpass is a separate Ports Demonstration Access Project; to be cleared under a separate environmental document. See Section 2.6
		• A number of additional concerns regarding the overpass structure on Sepulveda should be addressed, including a) potential disruption to pipeline usage, b) vehicular accident potential, c) accessibility/usability of the training center, d) truck turning movements to the terminal located east of the intersection of Alameda/Sepulveda and e) increased noise levels experienced by technical staff.	• The Sepulveda Boulevard overpass is a separate Ports Demonstration Access Project; to be cleared under a separate environmental document. See Section 2.6.
		• The EIS should address the potential for liquefaction and soil contamination in the area	• See Section 4.5 for a discussion of soil contamination and Section 4.7.3 for liquefaction issues.
		• There are other industrial properties in the area which should be notified regarding the project.	• Public notice was provided in areas near the project corridor. Proper notification will be provided to any property requiring acquisition.
13	Dunbar Economic Development Corporation 4225 South Central Avenue, Suite 102 Los Angeles, CA, 90011 Written Comments	• Asked for information regarding current responsibility for environmental clean up of trucks along the roadways and railroad tracks.	• The responsibility for cleanup of trucks is not within the jurisdiction of the proposed project. Cleanup activities associated with property acquisition for the proposed project have been discussed in Section 4.5.
		• Offered a plan for achieving commitment and participation from various governmental jurisdictions.	• Comment noted. The activities leading to consensus are being managed by the ACTA.

Appendix E
Alameda Corridor Project
Summary of Responses Received During the Scoping Period

NO.	COMMENTING PARTY	NATURE OF COMMENT	RESPONSE/LOCATION IN EIS
14	Jack Engle & Company 8440 S. Alameda St. Huntington Park, CA, 90255 Written Comments	• The project would eliminate two entrances to facilities at this business, one near Manchester, and one on Alameda.	• The preferred alternative would not eliminate these entrances.
15	GATX Tank Storage Corporation P.O. Box 9007 Long Beach, CA, 90810-0007 Written Comments	• GATX supports the project, and also views the corridor as a potential conduit for the transfer of bulk liquid petroleum commodities between the harbor and distribution to refineries and then ultimately to the general public. GATX is investigating the possibility of constructing pipelines in conjunction with the corridor.	• Comment noted.
16	Barry M. Schram & Associates P.O. Box 2863 La Jolla, CA, 92038 Written Comments	• Offered management services to the project in a number of subject areas.	• Comment noted.
17	Ventura-Lesbro 2418 E. 223rd St. Long Beach, CA, 90810 Written Comments	• Wishes to be considered an interested party for future information. Interested in long term lease agreements with Southern Pacific Railroad. The company has property potentially affected by the project at Alameda and Sepulveda.	• All parties that may be affected by proposed project improvements will be consulted with regarding the details of those effects.
18	Watson Land Company 22010 S. Wilmington Ave Carson, CA, 90745 Written Comments	• Transmitted previous comments made regarding the prior environmental document.	• Comment noted. The Watson Land Company will continue to be consulted regarding potential project impacts on its property.

Appendix E
Alameda Corridor Project
Summary of Responses Received During the Scoping Period

NO.	COMMENTING PARTY	NATURE OF COMMENT	RESPONSE/LOCATION IN EIS
19	Fred Anderson 2428 Micheltorena Los Angeles, CA, 90039-2532 Written Comments	• A bikeway should be included on both sides of the corridor.	• The preferred alternative includes reconstruction of Alameda Street generally in its present configuration with no other improvements being planned.
		• Reclaimed water should be used for landscape irrigation purposes.	• The proposed project does not include extensive landscaping.
		• A tree planting program should be made part of the project.	• Tree planting has not been included in the proposed project because adverse visual effects requiring mitigation through landscaping were not found.
20	William Ward 16235 Montbrook St Valinda, CA, 91744 Written Comments	• The width of the service road is inadequate.	• The proposed project would reconstruct the service road in its present configuration. This configuration has been found to be adequate thus far by parties having an interest in the matter.

Appendix F
Agency Correspondence

Memorandum of Understanding
among
The Federal Highway Administration,
The Federal Railroad Administration,
and
The California Department of Transportation

1.0 PURPOSE

This Memorandum of Understanding (MOU) is entered into jointly by the Federal Highway Administration (FHWA), the Federal Railroad Administration (FRA), as agencies of the U.S. Department of Transportation (USDOT) and by the California Department of Transportation (Caltrans), an agency of the State of California. The purpose of this MOU is to coordinate and document each agency's respective role and responsibilities in implementing actions related to the Alameda Transportation Corridor in Los Angeles, California, ensuring full compliance with the statutory requirements of the National Environmental Policy Act of 1969 (NEPA), as amended (42 U.S.C. 4321, et seq.) and related statutes, regulations and orders; and other Federal and State laws, regulations, policies, and procedures related to the development of this proposal. This agreement will expire upon the completion of the NEPA process.

2.0 BACKGROUND

Planning at the ports of Long Beach and Los Angeles began in October 1981 in response to growing concerns about the efficiency of the ground transportation system to accommodate increasing levels of traffic in the port area. Several studies have been completed indicating that the a consolidated route would be more cost-effective and have fewer environmental impacts than the other routing options. The Alameda Corridor Transportation Authority (ACTA) was created in 1989 comprising of a governing board of 16 members, representing the cities of Los Angeles, Long Beach, the Los Angeles County Transportation Commission, the Los Angeles County Board of Supervisors, the Port of Long Beach and Port of Los Angeles, Caltrans, the Southern California Association of Governments and each of the six cities along the corridor: Vernon, Huntington park, South Gate, Lynwood, Compton and Carson. This project is representative of intermodal transportation corridors for a railway and roadway improvement to facilitate access to the ports.

3.0 ROLES OF THE PARTIES

a. The FHWA and the FRA are designated as a joint federal lead agencies, in accordance with 40 CFR 1501.5 of the President's Council on Environmental Quality's "Regulations for Implementing the Procedural Provisions of NEPA" and related Federal environmental statutes. The FHWA's environmental regulations, 23 CFR 771, will be used as the baseline regulation for purposes of ensuring procedural compliance with NEPA.

b. The FHWA and FRA will be jointly responsible for determining the scope of issues to be addressed in the environmental process and for identifying the significant issues related to the proposed action. the FRA will be specifically

responsible for rail safety, electromagnetic field effects, and noise impacts. The FHWA will coordinate the Project with other Federal agencies with jurisdiction by law or special expertise. FRA will coordinate and provide technical assistance for issues related to intercity rail.

c. The FHWA will be responsible for the administration of Highway Trust Funds, coordinating the internal review of the environmental document, and assuring compliance with Title 23 provisions, the Clean Air Act (42 U.S.C. 7506), other applicable Federal requirements, and the Caltrans compliance with the Uniform Relocation Assistance and Real Property Acquisition Policies Act (449 C.F.R. Part 24) as would be the case for a normal Federal-aid highway project.

d. The Caltrans will be responsible for the coordination and oversight of appropriate environmental studies and necessary technical analysis, and for coordinating preparation of environmental documents, including, but not limited to, agency and public involvement, notifications, and coordination with affected agencies and the public.

e. The resulting environmental document will be made available to the public when approval by appropriate officials of the FHWA and FRA. FHWA will be responsible for publishing the Notice of Intent, setting up the scoping meeting and coordinating with cooperating agencies.

f. To ensure that each agency's concerns are addressed in the environmental document, each party to this MOU has designate a contact person, Mary Gray, FHWA, Bill Gelston, FRA, and Ron Kosinski, Caltrans. They have the authority to speak for and represent that agency. The contact person will be available, upon adequate notice, to attend and participate in coordination meetings or otherwise provide timely input into the preparation, coordination, and review of the environmental document. Study deliverables will be forwarded as soon as possible to the appropriate contact person(s) to allow for a timely review and comment period. Quarterly reports will be forwarded to the contact persons to keep them informed of the project's status. It is anticipated that these reports will be prepared either by the consultants or Caltrans and forwarded by the FHWA to the contact persons. The format of these reports will be decided by the FHWA in consultation with the Caltrans.

g. Because the time frame for completion of the environmental documents for the projects in question has been compressed to 1 year, time is of the essence. Therefore, to facilitate the review process, each agency has agreed to make every effort possible to complete its review of study deliverables, technical reports, etc. in an expeditious manner. Comments should be forwarded directly to the FHWA California Division Office in Sacramento, California.

4.0 CONCLUSION

In signing this MOU, the undersigned understand and accept the roles and responsibilities assigned to each of the parties. Each of the parties agrees to pursue maximum cooperation and communication to ensure that the proposal fully complies with applicable Federal and State requirements and results in a minimum duplication of effort.

James J. Bedna — 12/2/93

For the Federal Highway Administration — Date

Sally Cooper — 1-4-94

For the Federal Railroad Administration — Date

L L Dabelle — 12/6/93

For the California Department of Transportation — Date

U.S. DEPARTMENT OF TRANSPORTATION
FEDERAL HIGHWAY ADMINISTRATION
REGION NINE
CALIFORNIA DIVISION
980-9th Street, Suite 400
Sacramento, California 95814-2724

ARIZONA
CALIFORNIA
NEVADA
HAWAII
GUAM
AMERICAN SAMOA
N. MARIANA IS.

November 14, 1994

IN REPLY REFER TO
HB-CA

File: Alameda Corridor
Los Angeles County

Ms. Elaine Kaiser, Director
Section of Environmental Analysis
Interstate Commerce Commission
Washington, DC 20423

Dear Ms. Kaiser:

The Federal Highway Administration (FHWA) and the Federal Railroad Administration (FRA) in cooperation with the California Department of Transportation (Caltrans) and the Alameda Corridor Transportation Authority (ACTA) will prepare an Environmental Impact Statement (EIS) on a proposed multi-modal transportation project which will consolidate rail traffic and improve Alameda Street. Your participation as a cooperating agency is respectfully requested to aid in the preparation of this document, pursuant to your recent conversation with FRA officials.

Your agency involvement should entail those areas under its jurisdiction and no direct writing or analysis will be necessary for the document preparation. The following are activities we will take to maximize interagency cooperation:

- Invite you to coordination meetings
- Consult with you on any relevant technical studies that will be required for the project
- Organize joint field reviews with you
- Encourage your agency to use the above documents to express your views on the subjects within you jurisdiction or expertise
- Include information in the project environmental documents that cooperating agencies need to discharge their National Environmental Policy Act (NEPA) responsibilities and any other requirements regarding jurisdictional approval, permits, licenses, and/or clearances

This project is located along the approximately 18-mile long Alameda Corridor in Los Angeles County. The northern terminus is just south of I-10 at the junction of main line railroad tracks east of the Los Angeles River. The southern terminus is Terminal Island and San Pedro Ports. The fundamental purpose of the project is to provide the improvements necessary to consolidate freight rail service along the Alameda Corridor, so that efficiency of goods movement will be enhanced and delays to automotive traffic will be reduced.

The project entails to railroad component and a highway component. The railroad component includes:

- Double track railroad with centralized control
- Depressed trainway from 15th Street (just south of I-10) to Route 91
- At-grade railway with highway grade separations south of Route 91
- Continuous at-grade drill track to serve local industries

The highway component consists of:

- Reconstruction of Alameda Street with left-turn pockets and new signalization from Ii-10 to Route 91

Please formally respond to this request to be a cooperating agency so that we may include your letter in our document and keep you informed of appropriate meetings, field reviews, and ensure that you receive copies of all pertinent correspondence and reports. We have requested the previously prepared State Environmental Impact Report be forwarded to you immediately. When the Draft EIS is ready for final review later this month, you will be provided a copy. If you have any questions or would like to discuss in more detail the proposed project or agency role and responsibilities during the preparation of the environmental document, contact Douglas Bennett, of my staff, at (916)498-5037.

Sincerely yours,

/s/ C. Glenn Clinton

For
Peter C. Markle
Acting Division Administrator

Enclosure

cc:
Ron Kosinski, Caltrans Dist. 7
Art Goodwin, Port of LA
Gill Hicks, ACTA
Marilynl Kline, FRA

DBennett:lmg File Code: I:\common\policy\alamcorr.deb

INTERSTATE COMMERCE COMMISSION
Washington, DC 20423

OFFICE OF ECONOMIC AND ENVIRONMENTAL ANALYSIS

Mr. Peter C. Markle
Acting Division Administrator
U. S. Department of Transportation
Federal Highway Administration
Region Nine, California Division
980 - 9th Street, Suite 400
Sacramento, CA 95814-2724

December 15, 1994

Re: Alameda Corridor, Los Angeles County

Dear Mr. Markle:

This letter is in response to your request dated November 14, 1994, for the Interstate Commerce Commission to participate as a cooperating agency in the preparation of an Environmental Impact Statement (EIS) covering the construction and operation of the Alameda Corridor rail-highway project in Los Angeles County, CA. Staff members from the Commission's Section of Environmental Analysis (SEA) have conducted preliminary on-site inspections of the project, attended public scoping meetings underlying the State's EIR, and monitored the progress of the project to date.

As you know, the Interstate Commerce Commission has jurisdiction over railroad construction, operations, trackage rights, purchase or sales of lines, and grants of common carrier authority. In a letter dated December 6, 1994 (attached), the Cities of Los Angeles and Long Beach have stated that they would like the ICC to participate as a cooperating agency. At this time, there is no proceeding before the Commission that requires our participation in the Alameda Corridor EIS. However, the Cities state that they believe that the Commission will need to consider a proposed joint operating agreement that will govern the consolidated operations of the Southern Pacific Transportation Company, the Union Pacific Railroad Company, and the Atchison, Topeka and Santa Fe Railway over the rail portion of the Alameda Corridor. In the interest of expediency and avoiding duplicative environmental analysis in the future, we will participate as a cooperating agency in the EIS to be prepared jointly by the Federal Highway Administration and the Federal Railroad Administration.

We look forward to working with the agencies involved in this project. SEA's contact person for the Alameda Corridor project is Harold McNulty. Please feel free to contact Mr. McNulty at (202) 927-6217 or me at (202) 927-6212 if you have any questions.

Sincerely,

Elaine K. Kaiser, Chief
Section of Environmental Analysis

Enclosure

cc: Samuel M. Sipe, Jr.

h:\home\jag\markle.let

U.S. DEPARTMENT OF TRANSPORTATION
FEDERAL HIGHWAY ADMINISTRATION
REGION NINE
CALIFORNIA DIVISION
P.O. Box 1915
Sacramento, California 95812-1915

ARIZONA
CALIFORNIA
NEVADA
HAWAII
GUAM
AMERICAN SAMOA
N. MARIANA IS.

January 24, 1994

IN REPLY REFER TO
HB-CA

Mr. David Farrel
Environmental Protection Agency
75 Hawthorne Street
San Francisco, California 94105-3901

Alameda Corridor
Los Angeles County

Dear Mr. Farrel:

The Federal Highway Administration (FHWA) and the Federal Railroad Administration (FRA) in cooperation with the California Department of Transportation (Caltrans) and the Alameda Corridor Transportation Authority (ACTA) will prepare an Environmental Impact Statement (EIS) on a proposed multi-modal transportation project which will consolidate rail traffic and improve Alameda Street. Your participation as a cooperating agency is respectfully requested to aid in the preparation of this document.

Your agency involvement should entail those areas under its jurisdiction and no direct writing or analysis will be necessary for the document preparation. The following are activities we will take to maximize interagency cooperation:

- Invite you to coordination meetings
- Consult with you on any relevant technical studies that will be required for the project
- Organize joint field reviews with you
- Encourage your agency to use the above documents to express your views on the subjects within your jurisdiction or expertise
- Include information in the project environmental documents that cooperating agencies need to discharge their National Environmental Policy Act (NEPA) responsibilities and any other requirements regarding jurisdictional approvals, permits, licenses, and/or clearances

This project is located along the approximately 18-mile long Alameda Corridor in Los Angeles County. The northern terminus is just south of I-10 at the junction of main line railroad tracks east of the Los Angeles River. The southern terminus is Terminal Island and San Pedro Ports. The fundamental purpose of the project is to provide the improvements necessary to consolidate

freight rail service along the Alameda Corridor, so that efficiency of goods movement will be enhanced and delays to automotive traffic will be reduced.

The project entails a railroad component and a highway component. The railroad component includes:

- Double track railroad with centralized control
- Depressed trainway from 15th Street (just south of I-10) to Route 91
- At-grade railway with highway grade separations south of Route 91
- Continuous at-grade drill track to serve local industries

The highway component consists of:

- Reconstruction of Alameda Street with left-turn pockets and new signalization from I-10 to Route 91

As required by NEPA, all reasonable alternatives will be considered.

We look forward to your active participation as a cooperating agency on this EIS. Enclosed you will find a list of responsibilities for cooperating agencies.

If you do not formally respond to this request to be a cooperating agency, we will assume that you are accepting and we will keep you informed of appropriate meetings, field reviews, and ensure that you receive copies of all pertinent correspondence and reports. However, we would greatly appreciate a written response to our request. If you have any questions or would like to discuss in more detail the proposed project or agency role and responsibilities during the preparation of the environmental document, contact Mary Gray, of my staff, at (916) 551-1310.

Sincerely yours,
s/L. Brown

For
Roger Borg
Division Administrator

Enclosure

cc:
Caltrans District 7, Ron Kosinski
EPA, Harriet Hill

MGray:jw

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX
75 Hawthorne Street
San Francisco, Ca. 94105-3901

February 24, 1994

Ms. Mary Gray,
Transportation Engineer,
Federal Highway Administration
980 9th Street, Suite 400
Sacramento, California 95814-2724

Dear Ms. Gray:

The Environmental Protection Agency (EPA) has reviewed the Notice of Intent (NOI) to prepare and Environmental Impact Statement (EIS) for the **Alameda Corridor Project, Los Angeles County, California**, as published in the Federal Register, Thursday, December 16, 1993. This constitutes a reissuance of a NOI for the project as published in the Federal Register, Monday, January 7, 1991 to which we responded by letter dated October 7, 1991, attached. As was our previous review, this review is provided pursuant to the National Environmental Policy Act (NEPA), the Council on Environmental Quality NEPA Implementation Regulations 40 CFR Parts 1500-1508), and Section 309 of the Clean Air Act.

The proposed project would expand approximately 18 miles of an existing 4 lane urban corridor by adding two additional lanes to the roadway from Route 91 to the Ports of Los Angeles and Long Beach and by adding left turn pockets and additional signalization from Route 91 to I-10. In addition, the existing railway track would be enhanced and a new 10 mile below-grade section of railway would be constructed. The stated purpose for the project is "to provide the improvements necessary to consolidate freight rail service along the Alameda Corridor, so that efficiency of goods movement will be enhanced and delays to automotive traffic will be reduced." An Environmental Impact Report (EIR) has been completed for the proposed project pursuant to the California Environmental Quality Act (CEQA).

Because we have not had the opportunity to read the EIR, we are not able to provide specific comments concerning any of the alternatives eliminated from consideration as a result of completing the CEQA process; on alternatives which would be evaluated in the EIS; nor on the process used to eliminate any alternatives from consideration. In that regard, the NOI does acknowledge that this is a reissued NOI, therefore, please refer to our previous comment letter for the majority of our comments at this time. We do, however, offer the following in addition to those comments:

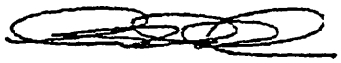
Printed on Recycled Paper

The reissued NOI notes that 1) the EIS will "examine the alternatives previously examined in the Draft EIR and Final EIR," and 2) a "locally preferred" alternative has been "selected for implementation." We are very concerned that this might be contrary to the requirements that an EIS not limit the choice of reasonable alternatives [40 CFR 1506.1(a)(2)], and that by **selecting an alternative for *implementation***, the NEPA process may be prejudiced on the basis of the project proponent's taking an interim action which could "determine subsequent development or limit alternatives [40 CFR 1506.1(3)]. We recommend that the Federal Highway Administration (FHWA) and the Federal Railroad Administration (FRA) provide a full range of alternatives for evaluation in the EIS. For those considered earlier and not carried forward, the EIS should include descriptions of each alternative and detailed rationale for eliminating the alternative. Further, the Agencies' Record of Decision (ROD) must reflect an unbiased decision based on the information presented in the EIS.

We are also very concerned about the increased truck and rail traffic being projected through the year 2020. According to information provided to us, there would be a 145% increase in daily truck movements and a 234% increase in daily train movements, using 1991 as the base year. This increase would presumably also result in an increased level of air pollution from these mobil sources. We recommend that the EIS provide a thorough discussion on the air quality impacts associated with this increase in traffic.

We appreciate the opportunity to comment at this stage of the proposed project. Please send three copies of the Draft EIS to this office when it is completed. Meanwhile, if you would like our input at the administrative draft stage of the EIS, or earlier, or if you have questions or need clarifications of any of our comments, please feel free to contact me at 415-744-1574.

Sincerely,



David J. Farrel, Chief
Environmental Review Section
Office of Federal Activities

Atch
Alameda.DF

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX
75 Hawthorne Street
San Francisco, Ca. 94105-3901

JUN 03 1994

Mary Gray
FHWA California Division
Federal Highway Administration
980 9th Street, suite 400
Sacramento CA 95814

Dear Ms. Gray:

This letter is intended to followup the meeting held on May 5th regarding the proposed Draft Environmental Impact Statement (DEIS) for the **ALAMEDA CORRIDOR PROJECT, Los Angeles County, California.** It is also intended to respond to the April 6th letter from Division Administrator Roger Borg requesting EPA's comments on the proposed Air Quality Analysis Methodology for the Alameda Corridor DEIS. Our comments on the May 5th meeting and Mr. Borg's April 6th letter are attached. We request that these comments be addressed, as appropriate, in the DEIS.

We appreciate the opportunity to comment on the air methodology and to have met with your office, the Port of Los Angeles, and the DEIS consultant (Myra L. Frank & Associates, Inc.). Please send three copies of the DEIS to my attention (mailcode: E-3-1) when it is filed with our Washington D.C. office. We would appreciate one copy each of any technical appendices on air quality, water quality, biological resources and hazardous materials that may be issued with the DEIS. If you have any questions, please call me at 415-744-1574 or David Tomsovic of my staff at 415-744-1569.

Sincerely,

David J. Farrel, Chief
Environmental Review Section
Office of Federal Activities

Enclosures: 3
(1) EPA Comments - 5 pages
(2) Coastal Nonpoint Pollution Control Factsheet - 1 page
(3) Erosion Control Measures - 17 pages

cc: Katiann Wong-Murillo, FHWA, San Francisco

Printed on Recycled Paper

JUN 03 1994

US ENVIRONMENTAL PROTECTION AGENCY (EPA) COMMENTS ON PROPOSED FEDERAL DRAFT EIS FOR ALAMEDA CORRIDOR PROJECT, LOS ANGELES COUNTY, CA. **Enclosure 1**

I) AIR QUALITY

Pursuant to Clean Air Act §176(c)(3) and EPA's regulations implementing this section, the DEIS should demonstrate that the Alameda Corridor Project (1) comes from a conforming transportation plan and program; (2) has not changed in design concept and scope from the design concept and scope approved in the program; and (3), because the project is in a carbon monoxide nonattainment area, eliminates or reduces the severity and number of violations of CO standards in the area substantially affected by the project. The project should not contribute to new violations of the Federal PM10 standard (particulate matter less than 10 microns in diameter) or exacerbate existing PM10 violations. The Transportation Conformity Rule ("Rule") provides additional direction for projects such as the Alameda Corridor Project.

(1) §93.111 of the Rule requires the use of the latest emissions model. The caveat to this is the existence of a grace period. The previous model may be used for projects if the analysis was begun during the grace period or before the Notice of Availability. The Rule specified the use of EMFAC7 as the latest motor vehicle emissions model, with the three-month grace period beginning November 24, 1993. On May 3, 1994 EPA approved the use of EMFAC7, Version 1.1. If the air quality impact analysis has not yet begun, we recommend the use of the latest emissions factor model (EMFAC7F1.1).

(2) §93.116 of the Rule requires that FHWA/FTA projects do not cause or contribute to any new localized carbon monoxide (CO) or PM10 violations or increase the severity or frequency of any CO or PM10 violations in any nonattainment or maintenance areas. Los Angeles County is a CO and PM10 nonattainment area.

The air quality data submitted along with Mr. Borg's April 6, 1994 letter shows a significant number of both new and exacerbated violations of the Federal 8-hour CO standard in both 2010 and 2020. In 2010, three new CO violations are projected and in 2020 six new CO violations are projected. In 2010 four exacerbations of the standard are projected, with five exacerbations of this standard projected for 2020. These "increases in severity" must be mitigated prior to making a conformity finding for the Alameda Corridor Project. The mitigation should be clearly described in the EIS and committed to in writing in the EIS Record of Decision, pursuant to 40 CFR §93.131(f) and 93.133(a).

(3) The March 21, 1994 memorandum from Gary Petersen (Frank & Associates, Inc.) to Bob O'Laughlin (FHWA) appended to Mr. Borg's letter to EPA states, "If the results of the above exercise does not produce the desired result, then the analysis would focus on the outlying rail lines. A suitable number of locations would be selected and the CO analysis would be repeated. The goal would be to find the required number of locations receiving benefits as a result of the project to produce a positive conformity finding."

We are concerned that this approach does not seem to recognize that CO violations are a localized air quality problem which must be measured at the local level. In effect, CO violations cannot be "diluted" by finding a suitable number of locations. We suggest that a more appropriate approach is to identify sensitive receptors along the entire corridor and then to model for potential CO impacts at these receptors.

(4) For further details on performing a localized CO and PM10 hot spot analysis, project sponsors should refer to §93.131 of the Rule. PM10 hot-spot analysis requirements will take effect when EPA releases modeling guidance on this subject, which should be within the next several months.

(5) The DEIS should identify sensitive receptors along the corridor such as schools, hospitals, childcare facilities and playgrounds. These locations, along with those identified by following procedures outlined in §93.131 of the Rule, should be modeled for potential localized impacts. Appropriate mitigation for adverse impacts to sensitive receptors should be identified in the DEIS.

II) TRAIN DERAILMENTS & SPILLS

The Alameda Corridor Final Environmental Impact Report (FEIR) states, "A corridor Emergency Response Plan will be prepared in accordance with applicable guidelines and regulations...it will be approved by all appropriate agencies." (p. S-54, Table S-1, Alameda Corridor Summary of Impacts). The inclusion of this emergency response language in the EIR is an important first step. However, we believe that a worst case Emergency Response Plan specific to the Alameda Corridor should be developed prior to inauguration of the facility. The Alameda Corridor Emergency Response Plan should incorporate the following details, which should be clearly outlined in the DEIS:

(1) The emergency response plan should be specifically designed for the Alameda Corridor area and should be adequate to respond to worst case scenarios, including timely, adequate responses to spill incidents affecting sensitive populations (schools, hospitals, childcare facilities, playgrounds, etc.) and natural resources.

(2) We strongly recommend that the emergency response plan be sent for review and comment to US EPA, the Coast Guard, US Fish & Wildlife Service, California Office of Emergency Services, California EPA, Los Angeles County, municipal fire departments, Regional Water Quality Control Board, California Department of Fish & Game, and the Highway Patrol.

(3) The emergency response plan for the corridor should be fully consistent with other existing contingency plans in the project area, including the Federal area plan maintained by the US Coast Guard, Long Beach (ATTN: Marine Environmental Response Branch, phone: 310-980-4450) and plans maintained by local jurisdictions. The corridor plan should reflect the requirements of the Coast Guard's Federal area plan, including its notification provisions. Any discrepancies with existing emergency response plans should be briefly noted in the DEIS.

(4) The plan should be fully consistent with existing Federal and State requirements, including US Department of Transportation requirements.

(5) The plan should be periodically updated, including any needed revisions to emergency phone numbers and key agency personnel.

(6) We recommend that the text of the emergency response plan be included in the DEIS so that the public has an opportunity to provide input.

III) HAZARDOUS SUBSTANCES CONTAMINATION

The Alameda Corridor Draft EIR contains Table 4-4 (Summary of High Priority Hazardous Waste Sites Along Corridor). In the comments section of Table 4-4, there are remarks such as "potentially hazardous site," "site is undergoing investigation," "pollution characterization in progress," "tank leak being confirmed," etc. In many cases since 1992 a site may have been confirmed as hazardous, decisions made by regulatory agencies, investigative studies completed, remedial work begun, etc. We strongly recommend that this table present the most current information on toxic contamination along the project corridor, since the data in Table 4-4 is two years old. Any new contaminated sites, as well as new suspected sites, should be included in an updated table in the DEIS.

IV) WATER QUALITY

1. Stormwater Permitting: The FEIR (pp. S-32 and S-33) lists the various approvals which may be required for the project. The list contains no reference to water quality protection, except to note that permits may be needed from the county Flood Control District. The DEIS should recognize that, pursuant to the

Federal Clean Water Act (CWA), any project disturbing a land area greater than five (5) acres requires stormwater discharge permits for both the construction and operational phases. The DEIS should document the project's consistency with applicable stormwater permitting requirements, including mitigation measures that may be necessary. The Regional Water Quality Control Board should be contacted concerning their requirements. Information on stormwater permitting can also be obtained from Mr. Eugene Bromley, EPA Region IX stormwater coordinator, at 415-744-1906.

2. Nonpoint Source Controls: §319 of the CWA requires States to assess nonpoint source water pollution problems and implement controls to protect and improve water quality. We encourage your office to work with the Regional Water Quality Control Board to determine what water pollution controls are necessary to comply with California's nonpoint source management program.

EPA recently issued a guidance document titled Guidance Specifying Management Measures for Sources of Nonpoint Pollution in Coastal Waters (EPA, Office of Water, Washington DC, 840-B-92-002, January 1993). It contains a great deal of information on measures to control nonpoint source water pollution from various activities and sources, including urban developments and construction actions. Enclosed is a factsheet indicating where you may obtain a free copy of the full document. Also enclosed are pertinent pages from the document regarding erosion control practices and related measures to protect water quality. As appropriate, we recommend that your agency use this information to develop water quality mitigation for the Alameda Corridor Project.

V) POLLUTION PREVENTION

The Pollution Prevention Act of 1990 (42 U.S.C. 13101-13109) established that, whenever feasible, it is the national policy of the United States that pollution should be prevented or reduced at the source; that pollution that cannot be prevented should be recycled in an environmentally safe manner; and that disposal or release of pollutants into the environment should be employed only as a last resort. We encourage the Federal Highway Administration to follow this type of an approach.

The Council on Environmental Quality (CEQ) has encouraged all Federal agencies to incorporate appropriate pollution prevention principles and mechanisms in their NEPA planning and decision-making. This CEQ guidance to Federal agencies was published in the January 29, 1993 Federal Register. We recommend that the DEIS contain a wide variety of pollution prevention measures, which may include water and energy conservation features, solid waste recycling, and hazardous waste minimization. Appropriate commitments to implement such measures should also be included in the DEIS.

JUN 03 1994

VI) ENVIRONMENTAL JUSTICE

The President recently signed Executive Order 12898, **Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations** (see February 16, 1994 Federal Register at p. 7629). In a transmittal memorandum for the heads of all Federal agencies and departments, the President stated, "Each Federal agency shall provide opportunities for community input in the NEPA process, including identifying potential effects and mitigation measures in consultation with affected communities and improving the accessibility of meetings, crucial documents, and notices." The DEIS should reflect, as appropriate, the requirements of EO 12898.

U.S. DEPARTMENT OF TRANSPORTATION
FEDERAL HIGHWAY ADMINISTRATION
REGION NINE
CALIFORNIA DIVISION
P.O. Box 1915
Sacramento, California 95812-1915

ARIZONA
CALIFORNIA
NEVADA
HAWAII
GUAM
AMERICAN SAMOA
N. MARIANA IS.

January 24, 1994

IN REPLY REFER TO
HB-CA

Mr. David Castanon
U.S. Army Corps of Engineers
Los Angeles Branch
P.O. Box 2711
Los Angeles, California 90012-2325

Alameda Corridor
Los Angeles County

Dear Mr. Castanon:

The Federal Highway Administration (FHWA) and the Federal Railroad Administration (FRA) in cooperation with the California Department of Transportation (Caltrans) and the Alameda Corridor Transportation Authority (ACTA) will prepare an Environmental Impact Statement (EIS) on a proposed multi-modal transportation project which will consolidate rail traffic and improve Alameda Street. Your participation as a cooperating agency is respectfully requested to aid in the preparation of this document.

Your agency involvement should entail those areas under its jurisdiction and no direct writing or analysis will be necessary for the document preparation. The following are activities we will take to maximize interagency cooperation:

- Invite you to coordination meetings
- Consult with you on any relevant technical studies that will be required for the project
- Organize joint field reviews with you
- Encourage your agency to use the above documents to express your views on the subjects within your jurisdiction or expertise
- Include information in the project environmental documents that cooperating agencies need to discharge their National Environmental Policy Act (NEPA) responsibilities and any other requirements regarding jurisdictional approvals, permits, licenses, and/or clearances

This project is located along the approximately 18-mile long Alameda Corridor in Los Angeles County. The northern terminus is just south of I-10 at the junction of main line railroad tracks east of the Los Angeles River. The southern terminus is Terminal Island and San Pedro Ports. The fundamental purpose of the

project is to provide the improvements necessary to consolidate freight rail service along the Alameda Corridor, so that efficiency of goods movement will be enhanced and delays to automotive traffic will be reduced.

The project entails a railroad component and a highway component. The railroad component includes:

- Double track railroad with centralized control
- Depressed trainway from 15th Street (just south of I-10) to Route 91
- At-grade railway with highway grade separations south of Route 91
- Continuous at-grade drill track to serve local industries

The highway component consists of:

- Reconstruction of Alameda Street with left-turn pockets and new signalization from I-10 to Route 91

As required by NEPA, all reasonable alternatives will be considered.

We look forward to your active participation as a cooperating agency on this EIS. Enclosed you will find a list of responsibilities for cooperating agencies.

If you do not formally respond to this request to be a cooperating agency, we will assume that you are accepting and we will keep you informed of appropriate meetings, field reviews, and ensure that you receive copies of all pertinent correspondence and reports. However, we would greatly appreciate a written response to our request. If you have any questions or would like to discuss in more detail the proposed project or agency role and responsibilities during the preparation of the environmental document, contact Mary Gray, of my staff, at (916) 551-1310.

Sincerely yours,
s/L. Brown

For
Roger Borg
Division Administrator

Enclosure

cc:
Caltrans District 7, Ron Kosinski

MGray:jw

CESPL-CO-R 31 May 1994

MEMORANDUM FOR THE RECORD

SUBJECT: Alameda Corridor Project

1. Based on the information furnished for the above project, it appears that the proposed waterway crossings may meet the general terms and conditions for nationwide permit Number 25 at 33 CFR 21 Part 330, Appendix A(B)(25) for the discharge of material such as concrete, sand, rock, etc. into tightly sealed forms or cells where the concrete is used as a structural member for standard pile supported structures, such as piers and docks; and for linear projects such as bridges, transmission line footings, and walkways. The nationwide permit does not authorize filled structural members that would support buildings, homes, parking areas, storage areas and other such structures. In addition, to meet the terms and conditions for nationwide permit Number 25, a certification or waiver from the Regional Water Quality Control Board would also be required.

Aaron Allen
Project Manager

DEPARTMENT OF THE ARMY
LOS ANGELES DISTRICT, CORPS OF ENGINEERS
300 NORTH LOS ANGELES STREET
LOS ANGELES, CALIFORNIA 90012

REPLY TO
ATTENTION OF:

January 13, 1995

Office of the Chief
Regulatory Branch

State of California
Department of Transportation
District 7 (Attn: R. Kosinski)
120 South Spring Street
Los Angeles, California 90012

Dear Mr. Kosinski:

Reference is made to our meeting of December 9, 1994 concerning the proposed Alameda Corridor project. In our meeting, you requested that the Corps Engineers address several regulatory and design issues concerning the proposed project.

In response to your questions concerning possible permit authorizations for the proposed bridge over the Los Angeles River, if the bridge utilizes support piers it appears that the project may meet the terms and conditions for nationwide permit Number 25 at 33 CFR 21 Part 330, Appendix A(B)(25) for the discharge of material such as concrete, sand, rock, etc. into tightly sealed forms or cells where the concrete is used as a structural member for standard pile supported structures, such as piers and docks; and for linear projects such as bridges, transmission line footings, and walkways. The nationwide permit does not authorize filled structural members that would support buildings, homes, parking areas, storage areas and other such structures. However, if the proposed bridge design requires a box culvert, the project may require an individual permit. In addition, to meet the terms and conditions for either a nationwide or an individual permit, a certification or waiver from the Regional Water Quality Control Board would be required.

In response to your question concerning floodplain encroachment (23 CFR 650.111), the Army Corps of Engineers has provided a copy of the above regulations (see enclosure).

In response to your question regarding the observed difference in FEMA flood-plain maps and the Army Corps of Engineers maps, the Corps of Engineer maps are developed for Corps projects, which includes an analysis of alterations in flood peaks resulting from future development. The FEMA floodplain maps are designed for determining present flood-plain insurance areas, which does not include changes in flow patterns associated with future development.

The Corps of Engineers would like to commend you for your coordination efforts and thank you for your cooperation. If you have any questions, please contact Aaron Allen of my staff at (213) 894-0349.

Sincerely,

John A. Gill

John A. Gill
Chief, Regulatory Branch

Enclosure
Copy Furnished:
Daniel, Mann, Johnson & Mendenhall/
Moffatt & Nichol Engineers (Attn: D. R. Milner, P.E.)
3250 Wilshire Boulevard
Los Angeles, California 90010

Citation
23 CFR s 650.111
23 C.F.R. s 650.111

FOUND DOCUMENT

Database
CFR

Mode
Page

CODE OF FEDERAL REGULATIONS
TITLE 23--HIGHWAYS
CHAPTER I--FEDERAL HIGHWAY ADMINISTRATION, DEPARTMENT OF TRANSPORTATION
SUBCHAPTER G--ENGINEERING AND TRAFFIC OPERATIONS
PART 650--BRIDGES, STRUCTURES, AND HYDRAULICS
SUBPART A--LOCATION AND HYDRAULIC DESIGN OF ENCROACHMENTS ON FLOOD PLAINS

s 650.111 Location hydraulic studies.

(a) National Flood Insurance Program (NFIP) maps or information developed by the highway agency, if NFIP maps are not available, shall be used to determine whether a highway location alternative will include an encroachment.
(b) Location studies shall include evaluation and discussion of the practicability of alternatives to any longitudinal encroachments.
(c) Location studies shall include discussion of the following items, commensurate with the significance of the risk or environmental impact, for all alternatives containing encroachments and for those actions which would support base flood-plain development:
(1) The risks associated with implementation of the action,
(2) The impacts on natural and beneficial flood-plain values,
(3) The support of probable incompatible flood-plain development,
(4) The measures to minimize flood-plain impacts associated with the action, and
(5) The measures to restore and preserve the natural and beneficial flood-plain values impacted by the action.
(d) Location studies shall include evaluation and discussion of the practicability of alternatives to any significant encroachments or any support of incompatible flood-plain development.
(e) The studies required by ss 650.111 (c) and (d) shall be summarized in environmental review documents prepared pursuant to 23 CFR 771.
(f) Local, State, and Federal water resources and flood-plain management agencies should be consulted to determine if the proposed highway action is consistent with existing watershed and flood-plain management programs and to obtain current information on development and proposed actions in the affected watersheds.

PART 650--BRIDGES, STRUCTURES, AND HYDRAULICS

Authority: 23 U.S.C. 109 (a) and (h), 144, 151, 351, and 319; 23 CFR 1.32; 49 CFR 1.48(b); E.O. 11988--Floodplain Management, May 24, 1977 (42 FR 26951); Department of Transportation Order 5650.2 dated April 23, 1979 (44 FR 24678); section 161 of Pub. L. 97-424, 96 Stat. 2097, 3135; Pub. L. 97-134, 95 Stat. 1699; and 33 U.S.C. 401 491 et seq., 511 et seq.

Source: 53 FR 32616, Aug. 26, 1988, unless otherwise noted.

SUBPART A--LOCATION AND HYDRAULIC DESIGN OF ENCROACHMENTS ON FLOOD PLAINS

Copr. (C) West 1995 No claim to orig. U.S. govt. works

Source: 44 FR 67580, Nov. 26, 1979, unless otherwise noted.

23 C. F. R. s 650.111
23 CFR s 650.111
END OF DOCUMENT

Copr. (C) West 1995 No claim to orig. U.S. govt. works

U.S. DEPARTMENT OF TRANSPORTATION
FEDERAL HIGHWAY ADMINISTRATION
REGION NINE
CALIFORNIA DIVISION
P.O. Box 1915
Sacramento, California 95812-1915

ARIZONA
CALIFORNIA
NEVADA
HAWAII
GUAM
AMERICAN SAMOA
N. MARIANA IS.

January 24, 1994

IN REPLY REFER TO
HB-CA

Mr. Gail Kobetich, Field Supv.
U.S. Fish and Wildlife Service
2730 Loker Avenue
Carlsbad, California 92008

Alameda Corridor
Los Angeles County

Dear Mr. Kobetich:

The Federal Highway Administration (FHWA) and the Federal Railroad Administration (FRA) in cooperation with the California Department of Transportation (Caltrans) and the Alameda Corridor Transportation Authority (ACTA) will prepare an Environmental Impact Statement (EIS) on a proposed multi-modal transportation project which will consolidate rail traffic and improve Alameda Street. Your participation as a cooperating agency is respectfully requested to aid in the preparation of this document.

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- Include information in the project environmental documents that cooperating agencies need to discharge their National Environmental Policy Act (NEPA) responsibilities and any other requirements regarding jurisdictional approvals, permits, licenses, and/or clearances

This project is located along the approximately 18-mile long Alameda Corridor in Los Angeles County. The northern terminus is just south of I-10 at the junction of main line railroad tracks east of the Los Angeles River. The southern terminus is Terminal Island and San Pedro Ports. The fundamental purpose of the project is to provide the improvements necessary to consolidate

freight rail service along the Alameda Corridor, so that efficiency of goods movement will be enhanced and delays to automotive traffic will be reduced.

The project entails a railroad component and a highway component. The railroad component includes:

- Double track railroad with centralized control
- Depressed trainway from 15th Street (just south of I-10) to Route 91
- At-grade railway with highway grade separations south of Route 91
- Continuous at-grade drill track to serve local industries

The highway component consists of:

- Reconstruction of Alameda Street with left-turn pockets and new signalization from I-10 to Route 91

As required by NEPA, all reasonable alternatives will be considered.

We look forward to your active participation as a cooperating agency on this EIS. Enclosed you will find a list of responsibilities for cooperating agencies.

If you do not formally respond to this request to be a cooperating agency, we will assume that you are accepting and we will keep you informed of appropriate meetings, field reviews, and ensure that you receive copies of all pertinent correspondence and reports. However, we would greatly appreciate a written response to our request. If you have any questions or would like to discuss in more detail the proposed project or agency role and responsibilities during the preparation of the environmental document, contact Mary Gray, of my staff, at (916) 551-1310.

Sincerely yours,
s/L. Brown

For
Roger Borg
Division Administrator

Enclosure

cc:
USFWS, Loren Hayes
Caltrans Dist. 7, Ron Kosinski

MGray:jw

United States Department of the Interior

FISH AND WILDLIFE SERVICE

ECOLOGICAL SERVICES
Carlsbad Field Office
2730 Loker Avenue West
Carlsbad, California 92008

April 26, 1994

Roger Borg, Division Administrator
Federal Highway Administration
980 Ninth Street, Suite 400
Sacramento, CA 95814-2724

Attn: Mary Gray

Re: Evaluation of Potential Impacts Due to the Alameda Corridor Project on Alameda Boulevard, Los Angeles County, California (1-6-94-I-159)

Dear Mr. Borg:

The Fish and Wildlife Service (Service) has received your request, dated April 8, 1994, for concurrence of your finding of no adverse effect on Federally-listed species relative to section 7 of the Endangered Species Act of 1973, as amended (Act). Your request was received by the Service on April 13, 1994.

Based on a review of the project description included in your request, the Service concurs that a "may affect" situation is remote and that formal consultation under section 7 of the Act is not required for the California least tern (Sterna antillarum browni).

If you have any questions regarding this consultation, please feel free to contact Marjorie Nelson of my staff at (619) 431-9440.

Sincerely,

for Gail C. Kobetich
Field Supervisor

cc: CDFG, Bill Tippets

U.S. DEPARTMENT OF TRANSPORTATION
FEDERAL HIGHWAY ADMINISTRATION
REGION NINE
CALIFORNIA DIVISION
P.O. Box 1915
Sacramento, California 95812-1915

ARIZONA
CALIFORNIA
NEVADA
HAWAII
GUAM
AMERICAN SAMOA
N. MARIANA IS.

January 24, 1994

IN REPLY REFER TO
HB-CA

Mr. Peter Douglas
U.S. Coastal Commission
45 Fremont Street - Suite 2000
San Francisco, California 94105-2219

Alameda Corridor
Los Angeles County

Dear Mr. Douglas:

The Federal Highway Administration (FHWA) and the Federal Railroad Administration (FRA) in cooperation with the California Department of Transportation (Caltrans) and the Alameda Corridor Transportation Authority (ACTA) will prepare an Environmental Impact Statement (EIS) on a proposed multi-modal transportation project which will consolidate rail traffic and improve Alameda Street. Your participation as a cooperating agency is respectfully requested to aid in the preparation of this document.

Your agency involvement should entail those areas under its jurisdiction and no direct writing or analysis will be necessary for the document preparation. The following are activities we will take to maximize interagency cooperation:

- Invite you to coordination meetings
- Consult with you on any relevant technical studies that will be required for the project
- Organize joint field reviews with you
- Encourage your agency to use the above documents to express your views on the subjects within your jurisdiction or expertise
- Include information in the project environmental documents that cooperating agencies need to discharge their National Environmental Policy Act (NEPA) responsibilities and any other requirements regarding jurisdictional approvals, permits, licenses, and/or clearances

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As required by NEPA, all reasonable alternatives will be considered.

We look forward to your active participation as a cooperating agency on this EIS. Enclosed you will find a list of responsibilities for cooperating agencies.

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Sincerely yours,

s/L. Brown

For
Roger Borg
Division Administrator

Enclosure

cc:
Caltrans Dist. 7, Ron Kosinski
U.S. Coastal Commission, Mark Delaplaine

MGray:jw

U.S. DEPARTMENT OF TRANSPORTATION
FEDERAL HIGHWAY ADMINISTRATION
REGION NINE
CALIFORNIA DIVISION
P.O. Box 1915
Sacramento, California 95812-1915

ARIZONA
CALIFORNIA
NEVADA
HAWAII
GUAM
AMERICAN SAMOA
N. MARIANA IS.

January 24, 1994

IN REPLY REFER TO
HB-CA

Ms. Theresa Henry
U.S. Coastal Commission
P.O. Box 1450
Long Beach, California 90802-4416

Alameda Corridor
Los Angeles County

Dear Ms. Henry:

The Federal Highway Administration (FHWA) and the Federal Railroad Administration (FRA) in cooperation with the California Department of Transportation (Caltrans) and the Alameda Corridor Transportation Authority (ACTA) will prepare an Environmental Impact Statement (EIS) on a proposed multi-modal transportation project which will consolidate rail traffic and improve Alameda Street. Your participation as a cooperating agency is respectfully requested to aid in the preparation of this document.

Your agency involvement should entail those areas under its jurisdiction and no direct writing or analysis will be necessary for the document preparation. The following are activities we will take to maximize interagency cooperation:

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The highway component consists of:

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As required by NEPA, all reasonable alternatives will be considered.

We look forward to your active participation as a cooperating agency on this EIS. Enclosed you will find a list of responsibilities for cooperating agencies.

If you do not formally respond to this request to be a cooperating agency, we will assume that you are accepting and we will keep you informed of appropriate meetings, field reviews, and ensure that you receive copies of all pertinent correspondence and reports. However, we would greatly appreciate a written response to our request. If you have any questions or would like to discuss in more detail the proposed project or agency role and responsibilities during the preparation of the environmental document, contact Mary Gray, of my staff, at (916) 551-1310.

Sincerely yours,

s/L. Brown

For
Roger Borg
Division Administrator

Enclosure

cc:
Caltrans Dist. 7, Ron Kosinski

MGray:jw

U.S. DEPARTMENT OF TRANSPORTATION
FEDERAL HIGHWAY ADMINISTRATION
REGION NINE
CALIFORNIA DIVISION
P.O. Box 1915
Sacramento, California 95812-1915

ARIZONA
CALIFORNIA
NEVADA
HAWAII
GUAM
AMERICAN SAMOA
N. MARIANA IS.

January 24, 1994

IN REPLY REFER TO
HB-CA

Mr. Robert A. Bryan, Director
Maritime Administration
Western Region
211 Main Street - Room 1112
San Francisco, California 94105

Alameda Corridor
Los Angeles County

Dear Mr. Bryan:

The Federal Highway Administration (FHWA) and the Federal Railroad Administration (FRA) in cooperation with the California Department of Transportation (Caltrans) and the Alameda Corridor Transportation Authority (ACTA) will prepare an Environmental Impact Statement (EIS) on a proposed multi-modal transportation project which will consolidate rail traffic and improve Alameda Street. Your participation as a cooperating agency is respectfully requested to aid in the preparation of this document.

Your agency involvement should entail those areas under its jurisdiction and no direct writing or analysis will be necessary for the document preparation. The following are activities we will take to maximize interagency cooperation:

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- Reconstruction of Alameda Street with left-turn pockets and new signalization from I-10 to Route 91

As required by NEPA, all reasonable alternatives will be considered.

We look forward to your active participation as a cooperating agency on this EIS. Enclosed you will find a list of responsibilities for cooperating agencies.

If you do not formally respond to this request to be a cooperating agency, we will assume that you are accepting and we will keep you informed of appropriate meetings, field reviews, and ensure that you receive copies of all pertinent cooresponden ce and reports. However, we would greatly appreciate a written response to our request. If you have any questions or would like to discuss in more detail the proposed project or agency role and responsibilities during the preparation of the environmental document, contact Mary Gray, of my staff, at (916) 551-1310.

Sincerely yours,
s/J. Schultz

For
Roger Borg
Division Administrator

cc:
John M. Pisani, Director
Office of Port and Intermodal Development

MGray:jw

STATE OF CALIFORNIA—THE RESOURCES A CY PETE WILSON, Governor

CALIFORNIA COASTAL COMMISSION
REMONT, SUITE 2000
FRANCISCO, CA 94105-2219
CE AND TDD (415) 904-5200

February 1, 1994

Roger Borg
Division Administrator
Federal Highway Administration
Region Nine
P.O. Box 1915
Sacramento, CA 95812-1915

Re: Alameda Corridor, Los Angeles County
Notice of Intent to Prepare EIS

Dear Mr. Borg:

Thank you for your coordination letter of January 24, 1994. Please place us on your mailing list for all environmental reports and hearing notices regarding the above-mentioned project. By this letter, we also wish to inform you that the proposed project and its associated facilities may trigger federal consistency review under Section 307(c) and (d) of the federal Coastal Zone Management Act (with implementing regulations at 15 CFR 930 et seq.). If so, a consistency certification would be required for any such facilities. Additionally, portions of this project will be located within the coastal zone; these portions will need to be reviewed under the Coastal Commission's coastal development permit process. In the event a consistency certification and a coastal development permit necessary, we will work with you to combine those review processes to avoid duplication. Because the coastal development permit process is handled by our area office in Long Beach, that office should also be on your mailing list. Therefore, please place on your mailing list both our San Francisco Headquarters Office (above) and our Long Beach Area Office at:

Coastal Commission
South Coast Area Office
P.O. Box 1450
245 West Broadway, Ste 380
Long Beach, CA 90802-4416

If you have any questions concerning the consistency process, please contact Jim Raives of my staff at (415) 904-5280. If you have any questions concerning the coastal development permit process, please contact Theresa Henry, permit chief of our Long Beach staff, at (310) 590-5071.

Sincerely,

MARK DELAPLAINE
Federal Consistency Supervisor

cc: Long Beach Area Office
NOAA Assistant Administrator
Assistant Counsel for Ocean Services
OCRM
Governor's Washington D.C. Office

CALIFORNIA COASTAL COMMISSION
45 FREMONT, SUITE 2000
SAN FRANCISCO, CA 94105-2219
VOICE AND TDD (415) 904-5200

Jurisdiction Letter

Date: 4 November 1994

Ron Kosinski
Environmental Branch Chief
CALTRANS District 1
120 S. Spring Street
Los Angeles, CA 90012

Project: Alameda Corridor Project: Construction of a 20-mile, $1.8 billion highway/rail transportation corridor linking the Ports of Los Angeles and Long Beach with the downtown Los Angeles rail yard.

Coastal Commission file no. (if applicable)
N.A.

U.S. Army Corps of Engineers Notice No. (if applicable)
N.A.

If a nationwide permit, NWP number N.A.

The Coastal Commission staff has received your request to identify Commission jurisdiction regarding the federal consistency process. Pursuant to the federal Coastal Zone Management Act (CZMA), a federal agency cannot issue a permit for an activity, either in or out of the coastal zone, that affects land and water uses or natural resources of the coastal zone until the applicant has complied with the requirements of Section 307(c)(3)(A) of the CZMA. (16 USC Section 1456[c][3][A].) These requirements can be met by receiving a Commission concurrence with a consistency certification prepared by the applicant or conclusion that the activity does not affect the coastal zone. Alternatively, these requirements can be satisfied by the issuance of a Commission approved coastal development permit. Since the federal consistency authority cannot be delegated to local governments, a coastal development permit issued by a local agency does not replace the requirement for a consistency certification. However, if an activity is within the Ports of San Diego, Long Beach, Los Angeles, or Port Hueneme and is identified in the Commission certified Port Master Plan, then no consistency certification is necessary.

The Coastal Commission staff has reviewed the information submitted for the above-referenced project, and has concluded that it:

/ / Is not within the coastal zone and does not affect the coastal zone. Therefore no further Coastal Commission review is necessary,

/X/ Is a non-federal activity within the coastal zone and is in an area where the Commission has not yet delegated permit authority to the appropriate local agency. Therefore, it needs a coastal development permit from the Commission. Contact our South Coast Area Office (see addresses on the following page) for details and permit application form. (Note: Receipt of a Coastal Commission-issued coastal development permit satisfies federal consistency requirements.)

/_/ Is a federally permitted activity within or affecting the coastal zone and does not otherwise need a coastal development permit from the Commission. Therefore, this project needs a consistency certification. Contact Jim Raives at (415) 904-5280 for information on the federal consistency process. (Note: Receipt of a local government-issued coastal development permit, as opposed to a Coastal Commission-issued coastal development permit, does not satisfy federal consistency requirements.)

/_/ Is within or affects the coastal zone and is a federal agency activity. Therefore it needs a consistency determination (or, at a minimum, a negative determination). Contact Jim Raives at (415) 904-5280 for information on the federal consistency process.

/_/ Is within the port of San Diego, Long Beach, Los Angeles, or Port Hueneme and is consistent with a certified Port Master Plan. Therefore, no further Coastal Commission review is necessary.

/_/ Is within one of the above ports but is not consistent with a certified Port Master Plan. Therefore, a Port Master Plan amendment is necessary.

/_/ We have insufficient information on the project location or details to determine jurisdiction. Please provide the following information:

Note: The Alameda Corridor terminus is within the dual coastal development permit (CDP) jurisdiction area of the coastal zone and the applicant must first obtain a CDP from the City of Los Angeles before applying for a separate CDP from the Commission. Processing the Commission CDP application would be aided by concurrent submittal of the project EIS.

Signed,

MARK DELAPLAINE
Federal Consistency Supervisor

cc: South Coast Area Office, Coastal Commission
Ralph Appey, POLA
Nadell Gayou, State Clearinghouse

==========

Coastal Commission Area Offices:

Coastal Commission
North Coast Area Office
45 Fremont St., Ste. 2000
San Francisco, CA 94105
Tel. No. (415) 904-5280

Coastal Commission
Central Coast Area Office
725 Front St., Suite 300
Santa Cruz, CA 95060-4508
Tel. No. (408) 427-4863

Coastal Commission
South Central Coast Area
89 S. California St., Ste. 200
San Buenaventura, CA 93001
Tel. No. (805) 641-0142

Coastal Commission
South Coast Area Office
P.O. Box 1450
245 West Broadway, Ste 380
Long Beach, CA 90802-4416
Tel. No. (310) 590-5071

Coastal Commission
San Diego Coast Area Office
3111 Camino Del Rio North, Ste. 200
San Diego, CA 92108-1725
Tel. No. (619) 521-8036

STATE OF CALIFORNIA — THE RESOURCES AGENCY PETE WILSON, Governor

OFFICE OF HISTORIC PRESERVATION
DEPARTMENT OF PARKS AND RECREATION
P.O. BOX 942896
SACRAMENTO 94296-0001
(916) 653-6624
FAX: (916) 653-9824

RECEIVED
OCT 3 1 1994
FHWA-Sacramento

October 27, 1994

Reply To: FHWA 940929A

Mr. Peter C. Markle
Acting Division Administratorr
California Division
Federal Highway Administration
980 9th Street, Suite 400
Sacramento CA 95814-2724

Subject: HB-CA; Alameda Corridor Project, Los Angeles, CA

Dear Mr. Markle:

In accordance with 36 CFR 800, regulations implementing Section 106 of the National Historic Preservation Act you have asked for my concurrence in FHWA's determination that historic properties within the Area of Potential Effects (APE) of the Alameda Corridor Project have been adequately identified and evaluated pursuant to applicable federal standards and guidelines. Thank you for consulting me.

FHWA has delineated an APE for this undertaking and has determined that the following properties within this APE are historic:

1. Rancho Domingues Adobe - included in the National Register of Historic Places (NRHP).

2. David Starr Jordan High School; Ritter Elementary School; Pacific Electric Railway Watson Station; AT&SF Redondo Junction/Butte Street Yard District - eligible for inclusion in the NRHP.

I concur in FHWA's determination that adequate steps were taken to identify historic properties within the APE and that these steps conform to applicable standards and guidelines promulgated by the Secretary of the Interior and to recommendations set forth in 36 CFR 800.4.

I have the following comments on FHWA's determinations of NRHP eligibility:

1. Ritter Elementary School - I agree that this property is eligible for inclusion in the NRHP under Criterion C at the local level of significance as a well-executed and very representative example of Renaissance Revival architecture. The property's period of significance is 1924. Unless FHWA informs me otherwise, the property's boundaries are coterminous with the legal lot lines of Ritter School and all other improvements within this boundary are not considered eligible for the NRHP.

2. Pacific Electric Railway Watson Station - I agree that this property is eligible for inclusion in the NRHP under Criterion A at the local level of significance for its association with the Pacific Electric Railway, a highly significant interurban transportation system in the Los Angeles Basin between the years 1901 and 1950. It is a now rare example of a Pacific Electric Railway single purpose (passenger) station possessing a relatively high degree of integrity in all categories including setting. It may therefore meet Criterion C as well. I would appreciate receiving FHWA's response to this latter suggestion.

Additional significance derives from the station's historic association with railroad tranportation and with the development of the oil industry in Los Angeles County.

By carrying the period of significance of Watson Station through to 1962, the HPSR is suggesting that the property is of exceptional significance. However, an explicit justification for exceptional importance has not been provided. I would ask that FHWA either furnish this justification as soon as possible or redefine the period of significance as 1904-circa 1944.

3. AT&SF Redondo Junction/Butte Street Yard District - I agree that this district is eligible for the NRHP under Criterion A at the *local* level of significance for its association with the economically important development and operation of railway transportation in the Los Angeles area. As a repair facility, this district was the site of a critically important dimension of AT&SF and subsequently of SF operations.

The district is also eligible under Criterion C at the local level as a good and increasingly rare example of a railroad locomotive maintenance facility dating to the early years of this century. Integrity of extant contributors is reasonably good.

The district consists of three contributors plus appurtenant infrastructure: the Roundhouse, the Watchman's Tower, the Supervisors Offices, and radiating tracks associated with Roundhouse operations. The district's boundaries are as described verbally in item D5 of the District Record and as depicted visually on the site map accompanying this record.

Information about the period of significance is confusing. For example, two different Roundhouse construction dates are cited: 1910; 1913. The period of significance for the district is given as 1893-1929. However, the property record states that no district contributor predates 1913 (1910?). The terminal date of 1929 is not explained.

In view of these facts, I suggest that the period of significance for this district would be 1913-1944. FHWA's response to this suggestion would be appreciated.

4. David Starr Jordan High School - A convincing case for eligibility under Criterion A has not been made. The fact that several graduates have attained fame because of their subsequent achievements does not demonstrate significance under A. Otherwise, virtually any community high school with some famous or notorious graduates could conceivably be eligible under Criterion A if the property were roughly fifty years old or older and had sufficient integrity.

On the other hand, I agree that the Administration Building is eligible under Criterion C as a fine example of PWA Moderne architecture. However, this is evidently not the only building on campus that may be significant. According to the recordation form, several others, e.g., the Auditorium, gymnasiums and some classroom buildings, could be noteworthy as well. Unfortunately, the discussion of these buildings is minimal and no photos are provided.

I recommend that the property be re-evaluated as a possible district comprised of contributors that span an appropriate time period such as 1927-1937. Integrity and boundary issues should be addressed as part of this effort.

FHWA has determined that all other properties inventoried and evaluated in connection with this undertaking are not historic pursuant to 36 CFR 800.2(c). I do not object to this determination with the following exceptions:

1. Bridge 53-C-0012 has a rating of "4", not "5", in the Local Bridge Inventory (1987). This discrepancy should be resolved by means of an evaluation, if necessary.

2. UP Bridge #2.41.5, over L.A. River north of Washington Blvd. was judged ineligible under Criteria, A-C, inclusive. While I could at this time agree with ineligibility under C and probably under B, I am interested in a more detailed explanantion of why the bridge is ineligible under Criterion A given its association with the SP, L & SL RR.

I look forward to receiving the additional information requested above and following that, FHWA's effect determination for this undertaking. I would also appreciate receiving from you further information documenting the steps FHWA has taken to obtain the comments of interested persons on this undertaking.

Your consideration of historic properties in the project planning process is appreciated. If you have any questions, please call Hans Kreutzberg at 653-9107.

Sincerely,

Cherilyn E. Widell
State Historic Preservation Officer

STATE OF CALIFORNIA — THE RESOURCES AGENCY PETE WILSON, Governor

OFFICE OF HISTORIC PRESERVATION
DEPARTMENT OF PARKS AND RECREATION
P.O. BOX 942896
SACRAMENTO 94296-0001
(916) 653-6624
FAX: (916) 653-9824

February 21, 1995

Reply To: FHWA940929A

Fred J. Hempel
Division Administrator
California Division
Federal Highway Administration
980 9th Street - Suite 400
Sacramento, CA 95814-2724

Re: Alameda Corridor Improvement Project, Los Angeles

Dear Mr. Hempel:

In response to my comments of October 27, 1994 on the undertaking cited above, FHWA has submitted revised historic property information that clarifies and corrects documentation previously submitted.

Unfortunately, the revisions are incomplete. All corrections made to property forms should be incorporated into the HPSR text. Secondly, the revised form for the Redondo Junction/Butte Street Yard District was not included. Thirdly, the primary record property description for David Starr Jordan HS is incomplete. FHWA's assistance in completing the needed revisions and in furnishing me with final copies of the corrected documentation would be appreciated.

In accordance with 36 CFR 800.5(d), FHWA has determined that the undertaking as presently configured would not adversely affect historic properties. I concur in this determination.

Your consideration of historic properties in the project planning process is appreciated. If you have any questions, please call Hans Kreutzberg at (916) 653-9107.

Sincerely,

Cherilyn Widell
State Historic Preservation Officer

REC'D FHWA

FEB 2 3 1995

U.S. DEPARTMENT OF TRANSPORTATION
FEDERAL HIGHWAY ADMINISTRATION
REGION NINE
CALIFORNIA DIVISION
980 9th Street - Suite 400
Sacramento, California 95814-2724

ARIZONA
CALIFORNIA
NEVADA
HAWAII
GUAM
AMERICAN SAMOA
N. MARIANA IS.

February 27, 1995

IN REPLY REFER TO
HB-CA

Mr. Jack Hallin, Acting Dist. Director
Caltrans, District 7
120 South Spring Street
Los Angeles, California 90012

Alameda Corridor Project

Attention: Environmental Branch

Dear Mr. Hallin:

Enclosed you will find the SHPO's February 21, 1995 response to our latest submission of Historic Property Survey information for the Alameda Corridor Project. As you can see, the SHPO provides both concurrence in our determination that the project would not adversely affect historic properties and also requests deficiencies in the survey report be remedied. Although the SHPO has not withheld final concurrence pending these corrections, we believe the requested modifications and additions should be made as quickly as practical.

Please seek to have the modifications requested by the SHPO made to the survey package and submit revised documents or pages, accordingly, by March 31, 1995. Should you have questions with regard to this request, please contact Douglas Bennett of this office at (916) 498-5037.

Sincerely yours,

S/D. Bennett

For
Fred J. Hempel
Division Administrator

Enclosure

DBennett:jw

FILED: I:\COMMON\POLICY\ALAHPSR.DB

U.S. DEPARTMENT OF TRANSPORTATION
FEDERAL HIGHWAY ADMINISTRATION
REGION NINE
CALIFORNIA DIVISION
980 9th Street - Suite 400
Sacramento, California 95814-2724

ARIZONA
CALIFORNIA
NEVADA
HAWAII
GUAM
AMERICAN SAMOA
N. MARIANA IS.

August 29, 1994

IN REPLY REFER TO
HB-CA

Mr. Mark Pisano, Executive Director
Southern California Association
of Governments
818 W. 7th Street
Los Angeles, California 90017

Dear Mr. Pisano:

SUBJECT: Alameda Corridor Conformity Determination

Pursuant to the National Environmental Policy Act (NEPA) of 1969, the Federal Highway Administration (FHWA) will be shortly publishing a Draft Environmental Impact Statement (DEIS) for the Alameda Corridor project. In addition to satisfying requirements under NEPA, the FHWA must also comply with recently developed requirements under the Clean Air Act issued by EPA and documented in 40 CFR 51 (November 24, 1993). Pursuant to these requirements, FHWA is hereby requesting a determination of conformity from SCAG, in satisfaction of paragraph 51.416 of the EPA regulations. I have enclosed excerpts from the DEIS Affected Environment and Environmental Consequences chapters, which address air quality issues, to assist you in reaching that determination.

Please forward the conformity determination to me for inclusion in the DEIS prior to its publication. Our schedule calls for the DEIS to be sent to the printer in September, therefore your prompt attention to this would be appreciated.

Sincerely yours,

For
Peter C. Markle
Acting Division Administrator

Enclosure

SOUTHERN CALIFORNIA ASSOCIATION OF GOVERNMENTS
818 West Seventh Street,12th Floor • Los Angeles, California 90017-3435 □ (213) 236-1800 • FAX (213) 236-1825

September 22, 1994

Mr. Peter C. Markle
Acting Division Administrator
Federal Highway Administration
980 9th Street, Suite 400
Sacramento, CA 95814-2724

Dear Mr. ~~Markle~~ Pete:

This is in response to your request that the Southern California Association of Governments (SCAG) provide comments on the Environmental Impact Statement (EIS) air quality section for the Alameda Corridor project.

The Alameda Corridor is included in the 1994 Regional Transportation Plan (RTP) and its eligible component projects are also included in the FY 1993-1999 Regional Transportation Improvement Program Amendment (RTIP). Both the RTP and the RTIP are currently awaiting approval by your agency. In addition, the Alameda Corridor was included in the 1989 Regional Mobility Plan and the FY 1993-1999 RTIP, which are the currently conforming RTP and RTIP.

SCAG's analysis of the EIS air quality section indicates that the Alameda Corridor is a conforming project in compliance with §93.103(c)(1)(i), §93.121, and §93.131 of the transportation conformity regulations. Therefore, SCAG recommends to the Federal Highway Administration that it also find that the Alameda Corridor conforms with the Federal Clean Air Act.

If you have any further questions or desire additional information, please contact Rosemary Ayala of my staff at (213) 236-1927.

Sincerely,

Arnie

ARNOLD I. SHERWOOD, Ph.D.
Director of Forecasting, Analysis & Monitoring

Stella Mendoza City of Brawley-President, Ed Edelman Los Angeles County-First Vice President, Dick Kelly City of Palmdale-Second Vice President, Gaddi Vasquez Orange County- Past President, • Richard Alarcon City of Los Angeles, Richard Alatorre City of Los Angeles, Robert Bartlett City of Monrovia, George Bass City of Bell, Ron Bates City of Los Alamitos, George Battey, Jr. City of Burbank, Hal Bernson City of Los Angeles, Walter Bowman City of Cypress, Marvin Braude City of Los Angeles, Susan Brooks City of Rancho Palos Verdes, Art Brown City of Buena Park, Yvonne Brathwaite-Burke Los Angeles County, Jim Busby, Jr. City of Victorville, Bob Buster Riverside County, Laura Chick City of Los Angeles, John Cox City of Newport Beach, Cynthia Crothers City of Moreno Valley, Hal Croyts City of Lomita, Richard Dixon City of Lake Forest, Doug Drummond City of Long Beach, Lillian Eaton City of Yucaipa, Joseph Esquivel City of Lakewood, John Ferraro City of Los Angeles, Laryn Foley City of Calabasas, John Flynn Ventura County, Ruth Galanter City of Los Angeles, Sandra Genis City of Costa Mesa, Jackie Goldberg City of Los Angeles, Candace Haggard City of San Clemente, Garland Hardeman City of Inglewood, Mike Hernandez City of Los Angeles, Nate Holden City of Los Angeles, Robert Jamison City of Artesia, Jeff Kellogg City of Long Beach, Abbe Land City of West Hollywood, John Longville City of Rialto, Ron Loveridge City of Riverside, John Melton City of Santa Paula, Barbara Messina City of Alhambra, Judy Mikels City of Simi Valley, David Myers City of Palmdale, Kathryn Nack City of Pasadena, Bev Perry City of Brea, Gwenn Norton-Perry City of Chino Hills, Ron Parks City of Temecula, Irv Pickler City of Anaheim, Michael Plisky City of Oxnard, Beatrice Proo City of Pico Rivera, Larry Rhinehart City of Montclair, Richard Riordan City of Los Angeles, Mark Ridley-Thomas City of Los Angeles, Albert Robles City of South Gate, Sam Sharp Imperial County, Marcine Shaw City of Compton, Rudy Svorinich City of Los Angeles, Tom Sykes City of Walnut, Laurie Tully-Payne City of Highland, Joel Wachs City of Los Angeles, Rita Walters City of Los Angeles, Judy Wright City of Claremont, Zev Yaroslavsky City of Los Angeles •

SCAG
SOUTHERN CALIFORNIA ASSOCIATION OF GOVERNMENTS
818 West Seventh Street,12th Floor • Los Angeles, California 90017-3435 □ (213) 236-1800 • FAX (213) 236-1825

January 24, 1995

Mr. Gill V. Hicks
General Manager
Alameda Corridor Transportation Authority
6550 Miles Avenue, Room 113
Huntington Park, CA 90255-4338

Dear Mr. Hicks:

The Metropolitan Planning Rules issued by the Federal Highway Administration (FHWA) and the Federal Transit Administration (FTA) on November 29, 1993 require that Major Investment Studies (MIS) be prepared for all significant transportation investments that could potentially involve federal funds.

On January 10, 1995 the *Major Investment Study Review Committee* met and determined that the Alameda Corridor is not subject to the MIS requirements. While the project will potentially use significant amounts of federal monies, the project is neither a transit project nor a highway project.

This letter memorializes the findings of the MIS Review Committee that, according to the Federal Highway Administration, Federal Transit Administration, Caltrans District 7, Los Angeles County Metropolitan Transportation Authority, and the Southern California Association of Governments, the Alameda Corridor is not subject to the MIS requirements set forth in the Metropolitan Planning Rules. If you have any questions, please contact me at (213) 236-1880.

Sincerely,

Patrick Michell
Principal Transportation Planner

cc: Gary Petersen, Myra L. Frank & Associates, Inc.
Joel Bryant, SCAG
Jim Gosnell, SCAG
MIS Review Committee members

H:\MIS\LTRFO.ACM

Stella Mendoza City of Brawley-President, Ed Edelman Los Angeles County-First Vice President, Dick Kelly City of Palmdale-Second Vice President, Caddi Vanoura Orange County, Richard Alatorre City of Los Angeles, Richard Alatorre City of Los Angeles, Robert Bartlett, Hal Bernson City of Los Angeles, Walter Bowman City of Cypress, Marvin Braude City of Burke Los Angeles County, Jim Busby, Jr. City of Victorville, Bob Buster Riverside County, Hal Crayts City of Lomita, Richard Dixon City of Lake Forest, Doug Drummond City of Los Karyn Foley City of Calabasas, John Flynn Ventura County, Ruth Galanter City of Los Angeles, Clements, Garland Henderson City of Inglewood, Mike Hernandez City of Los Angeles, Nat of West Hollywood, John Longville City of Rialto, Ron Loveridge City of Riverside, John City of Palmdale, Kathryn Nack City of Pasadena, Bev Perry City of Brea, Gwenn Norton-Pe Beatrice Proo City of Pico Rivera, Larry Rhinehart City of Montclair, Richard Riordan City Orange County, Marcine Shaw City of Compton, Rudy Svorinich City of Los Angeles, Tom Sykes Angeles, Judy Wright City of Claremont, Zev Yaroslavsky City of Los Angeles •

Post-it® Fax Note 7671	Date 1-25-95	# of pages ▶ 1
To GARY PETERSEN	From JOEL BRYANT	
Co./Dept. MFA	Co. SCAG	
Phone #	Phone # 236-1940	
Fax # 627-6853	Fax # 236-1963	

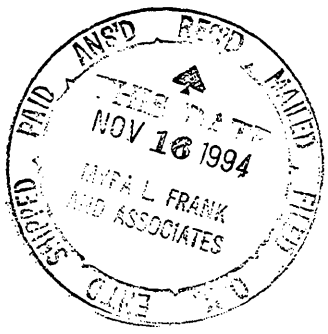
Los Angeles County
Metropolitan
Transportation
Authority

818 West Seventh Street
Suite 300
Los Angeles, CA 90017

213.972.6000

Mailing Address:
P.O. Box 194
Los Angeles, CA 90053

November 7, 1994



Gill Hicks
General Manager
Alameda Corridor Transportation Authority
6550 Miles Avenue
Huntington Park, California 90255

Subject: Inclusion of the Alameda Corridor Project in the Congestion Management Program

Dear Mr. Hicks:

As you requested, this letter is to confirm inclusion of the Alameda Corridor Project in the Los Angeles County Congestion Management Program (CMP).

The current CMP for Los Angeles County was adopted by the Los Angeles County Metropolitan Transportation Authority Board of Directors in November 1993. Funding for further development of the Alameda Corridor Project is included as part of the 1993 CMP's capital improvement program. In addition, Alameda Street is a designated CMP highway route.

Through the CMP, local jurisdictions within the Alameda Corridor and throughout the County have committed to the following formal actions toward congestion management:

1) Traffic congestion on CMP routes are biennially monitored to identify relative levels throughout the County, track changes over time, and provide before-and-after project data.

2) All cities and the County of Los Angeles have adopted and currently implement Transportation Demand Management ordinances which require that all non-residential development provide transit and rideshare-supportive design features.

3) All cities and the County have adopted and currently implement a land use analysis program. This program ensures evaluation of the impacts of new development on designated CMP highway routes and transit systems.

4) All cities and the County have committed, through city council-adopted resolutions, their participation in the countywide deficiency plan. The deficiency plan requires that each city and the County make transportation

improvements (through land use, operational, demand management, or capital strategies) which keep pace with new development. The deficiency plan commits to annually reviewing the balance between impacts related to new development and improvements made by implementing these strategies.

5) The County is also committed to pursing other congestion relief improvements in the Alameda area, such as the Harbor Freeway Transitway which is currently under construction. Also ongoing are traffic signal synchronization projects on Rosecrans Avenue and Imperial Highway, as well as a larger feasibility study for additional operational improvements in the area. Demand management strategies are also high priorities, and funds have been allocated to develop transportation management associations in the area as well as an electronic access center integrated with the Metro Blue Line.

Please call me at (213) 244-6237 if you would like additional documentation regarding the points above, or if I can be any further assistance.

Sincerely,

EDWARD K. SHIKADA, MANAGER
CONGESTION MANAGEMENT PROGRAM

cc: Gary Peterson/MFA

City of Downey

FUTURE UNLIMITED

October 11, 1991

Mr. Gary L. Peterson, Project Manager
Myra L. Frank & Associates
811 West 7th Street, Suite 800
Los Angeles, CA 90017

SUBJECT: Alameda Corridor Union Pacific Alignment

Dear Mr. Peterson:

This letter notes the impacts of the Union Pacific alignment of the Alameda Corridor, as requested by your letter of September 25, 1991.

The Union Pacific San Pedro Branch crosses the southwesternmost corner of the City of Downey. Land within 1000 feet of either side of the alignment is part of Rancho Los Amigos, owned by the County of Los Angeles. The County is now developing this land as the premier business park in the City of Downey. Property closest to the railway is part of Phase III, now in the planning stages with construction beginning as early as 1992, and Phase IV, to be developed in the mid-1990s. A new road, Flores Street, will connect the center of this complex with Garfield Avenue, west of the railroad. The County is now working with Union Pacific in developing plans for a grade separation between the San Pedro Branch and Flores Street. As planned, Flores Street will pass beneath the rail line.

Alignment of the Alameda Corridor along the San Pedro Branch will have significant consequences not only for the proposed grade separation, but for the entire Rancho Los Amigos project as well. New buildings, including manufacturing space, offices, and warehouse space, are planned within 1000' of the railroad right-of-way. Expanding the right-of-way to allow for up to 100 trains per day, a mile in length or more, will severely reduce the land that the County may develop. Further, noise and vibration from these trains will negatively impact the desirability of the other buildings at Rancho. The loss of leasable floor area and the devaluation of the remaining buildings will decrease substantially the revenue that both the County (in the form of rent) and the City of Downey (in the form of sales and property taxes) will receive from the Rancho project.

In addition, the County plans a major expansion of the Rancho Los Amigos hospital facilities at the northeast corner of Imperial Highway and Old River School Road. This facility is less than one half mile from the Union Pacific right-of-way. Constructing the Alameda corridor along this route would undoubtedly affect accessibility to the hospital as well as produce substantial noise and vibration impacts.

Finally, the San Pedro Branch crosses Garfield Avenue, Gardendale Street, and Imperial Highway, all of which carry traffic into Downey. The proposed alignment would hamper this traffic flow.

11111 BROOKSHIRE AVENUE POST OFFICE BOX 607 DOWNEY, CALIFORNIA 90241-0607 (213) 869-7331

The Union Pacific San Pedro Branch will significantly affect existing and proposed development within the City of Downey and will have profound negative effects both environmentally and financially. For these reasons, the City of Downey opposes expansion of this branch for the Alameda Corridor. Because the proposed alignment would have major consequences to the Rancho Los Amigos project, we recommend that you contact the County of Los Angeles for their comments as well. If you have any further questions, please contact me at (213) 869-7331, ext. 327.

Sincerely,

Ron Yoshiki
City Planner/Asst. Community Development Director

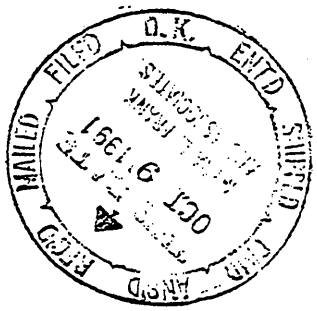
cc:
Mr. Les Detwiler
Chief Administrative Office
Hall of Administration, Room 585
500 West Temple
Los Angeles, CA 90012

alameda.cor\upalt.wmd

CITY OF PARAMOUNT

Community Development
(213) 220-2036

GERALD A. MULROONEY
Mayor
ELVIRA AMARO
Vice Mayor
ESTHER C. CALDWELL, Ed. D.
Councilmember
MANUEL E. GUILLEN
Councilmember
HENRY HARKEMA
Councilmember



October 7, 1991

Mr. Gary Peterson
Myra L. Frank and Associates
811 West 7th St., Suite 800
Los Angeles, CA. 90017

RE: Alameda Corridor Project - Alternative Projects Analysis

Dear Mr. Peterson:

We were asked by your firm to provide comments regarding environmental impacts associated with a possible alternative to the Alameda Corridor project which would utilize existing railroad alignments running north-south through the City of Paramount to accommodate a substantially increased number of train runs between Long Beach and points north. Specifically we were asked to comment on impacts other than those related to traffic issues.

As you might imagine, we are extremely concerned about the potential for the railroad lines which bisect our town to be impacted any further than they already are. Currently, when trains travel through Paramount, they completely cut off access between our hospital and fire station. They also cause severe traffic backups on three major boulevards: Alondra, Somerset, and Rosecrans. These three boulevards are used heavily during commuter hours as collectors from the Artesia and Long Beach freeways, and as freeway alternative routes. You may be aware that this year the Public Utilities Commission, which ranks grade crossings statewide, gave top priority for grade separation funding to the grade crossing at Alondra Boulevard and the north-south railroad alignment. We are now on the verge of mitigating some of the tremendous problems associated with the train traffic, and, as you can imagine, we are extremely distressed to see proposals which could put us back to square one.

The adverse environmental impacts (other than the obvious effects on traffic) which we foresee as a result of the Alameda Corridor alternative are aesthetic impacts, creation of public hazards, and a significant increase in noise, dust, vibrations, smells, soot and fumes all along the existing alignments and, because of the increased intensity of the train traffic, extending beyond the direct vicinity to other nearby uses.

The alignment currently traverses the entire city. All along the northern portion of the rail lines there are residential properties. Much of the area affected by the train traffic is zoned for multiple family development and we are still seeing significant new development there. Approximately ten apartment and condominium complexes have been constructed in this area within the past two years, and we foresee lot consolidation and new development in this area to continue. We are concerned about the impacts the project would have on the quality of life for these residents. Because of the predominantly residential character of this area, we are also concerned about the increased potential for accidents involving children. Children walk and play along the tracks which, currently, are unprotected.

Further south along the alignment is the City's major commercial center. Noise, fumes and dust from frequent train travel through this area will have a significant impact on the carrying out of commerce in this zone. Also, during the past 10 years the City has spent millions of redevelopment dollars to create an attractive Central Business District. The old downtown was razed and a new one, designed by a nationally known architectural firm, put in its place. The continual passage of trains through this area will certainly diminish the aesthetics we have worked so hard to achieve.

Additionally the tracks pass immediately behind a Catholic Church and school, and close by a public park and community service center which serves meals for senior citizens on a daily basis, and a large intermediate school.

Continuing south, the line passes adjacent to a vacant parcel of land which is seriously being considered by the Paramount Unified School District as a future intermediate school site. This area also constitutes our industrial district. Minor vibrations from a drop forge in this area already cause problems for other industrial users who rely on finely calibrated equipment for their operations, and increased vibrations from passing trains would exacerbate this problem further. Before leaving Paramount, the line passes by a 66-unit apartment complex, a 156-unit senior citizen housing project and Charter Suburban hospital.

Beside the immediate impacts this project would have, we are also concerned that the project would greatly increase the potential for public hazards. Derailments have occurred on this line and increased train traffic certainly "ups the odds" for more accidents of this nature. Given the types of uses which adjoin the tracks, a derailment along this alignment could be disastrous. Also, Paramount is located on the Newport-Inglewood earthquake fault, and is also designated as an area which would suffer severe liquifaction during a major quake. Train derailments which would be likely to occur during an earthquake would significantly worsen the emergency situation.

As you can see, the City of Paramount has grown up around the railroad tracks and the alignment runs through the middle of a fully developed urban community. Sensitive uses exist along the entire length of the alignment. These uses are already adversely impacted by the presence of the tracks, and an increase in the intensity of train travel through Paramount, with its accompanying noise, smell, vibration and air quality impacts, could create real health hazards for many Paramount residents, and impact commerce, industry and the quality of life in the community.

I have included with this letter a copy of an article which ran recently in a local newspaper and touches on many of the issues I have outlined in this letter. The article also conveys the sense of desperation felt by the residents who have to live along railway alignments, and how that situation affects their daily lives.

If you have any questions or comments regarding our concerns, please feel free to contact me at (213) 220-2048.

CITY OF PARAMOUNT

Linda Benedetti-Leal
Senior Planner

Appendix G
Notice of Intent

movement will be enhanced and delays to automotive traffic will be reduced.

The Alameda Corridor project has been developing over the past 12 years, beginning with the creation in 1981 of the Technical Advisory Committee by the Southern California Association of Governments (SCAG). Various planning activities undertaken by that committee eventually led to the formation of the Alameda Corridor Task Force in 1985, which in turn led to the creation of a joint powers organization called the Alameda Corridor Transportation Authority (ACTA) in 1989. The ACTA initiated a conceptual engineering effort in 1990, in order to more fully define the project. It was at that time that the first Notice of Intent was issued.

Subsequent to the initiation of the conceptual engineering effort, it was decided that Federal funding sources which had been identified for application to the project consisted of amounts earmarked for specific grade separation projects along the corridor. These projects could be documented under Categorical Exclusions, rather than an EIS. The ACTA withdrew from the Federal environmental process at this point, and the project moved forward under CEQA.

A range of conceptual engineering alternatives were developed for evaluation that included an at-grade consolidated trainway and a depressed trainway, each of which was coupled with several different levels of associated roadway improvements. The project location was defined as Alameda Street, extending from downtown Los Angeles to the Ports of Los Angeles and Long Beach. An alignment variation was considered in the northern portion of the corridor that would have routed the project outside the city of Vernon. Two alternative project locations were considered, one running along the Los Angeles River and a second which would have used another freight rail line to the east of Alameda in the general vicinity of the Los Angeles River.

As a result of the CEQA evaluation process, which used a range of engineering and environmental factors, the alternative project locations were dropped from further consideration. Three project alignments within the Alameda Corridor were developed further and subjected to detailed environmental evaluation. A Draft Environmental Impact Report (DEIR) was issued for public comment in August of 1992, pursuant to CEQA. The public comment process included six formal public hearing sessions which were attended by a total of 163 persons. Testimony was taken from 47 individuals and 35 letters of comment were received from a variety of agencies and individuals.

A Final Environmental Impact Report (FEIR) was prepared and considered by the ACTA, and in January of 1993, the ACTA certified the FEIR as complete, adopted a locally preferred alternative for implementation, and also adopted Findings & Statement of Overriding Considerations and a Mitigation Monitoring Program, all actions required by CEQA. The locally preferred alternative would construct a depressed trainway along Alameda Street, from northern rail connections in downtown Los Angeles southerly to State Route 91. It would reconstruct adjacent roadways on the east and west sides of Alameda Street to their present configuration, with improvements to signalization and other transportation systems management (TSM) types of improvement. From State Route 91 southerly to the Ports of Los Angeles and Long Beach, an at-grade trainway would be constructed, and Alameda Street would be widened to six lanes. The locally preferred alternative was considered the environmentally superior alternative. The CEQA Notice of Determination was posted on January 22, 1993.

In order to apply for additional Federal funds, it was decided by ACTA in consultation with Caltrans and FHWA that a Federal environmental document should be prepared. The Federal Highway Administration and the Federal Railroad Administration will serve as joint lead agencies under NEPA. The Federal environmental document will be an EIS and it will examine the alternatives previously examined in the DEIR and FEIR, recognizing that a locally preferred alternative has been selected for implementation. The FEIR will be used to the maximum extent practicable in preparing the EIS.

Letters describing the proposed action and soliciting comments will be sent to appropriate Federal, State and local agencies, and to other parties who are known to have an interest in the project. A formal scoping meeting will be held on Tuesday, January 18, 1994, at Bateman Hall in the City of Lynwood.

Comments or questions concerning this proposed action should be addressed to the FHWA at the address shown above.

Dated: December 10, 1993.

Mary Gray,

Transportation Engineer, Sacramento, California.

[FR Doc. 93-30721 Filed 12-15-93; 8:45 am]

BILLING CODE 4910-22-M

Environmental Impact Statement: Orange and San Diego Counties, CA

AGENCY: Federal Highway Administration (FHWA), DOT.

ACTION: Revised notice of intent.

SUMMARY: The FHWA is issuing this revised Notice to advise the public that an Environmental Impact Statement will be prepared for a proposed highway project in southern Orange County and northern San Diego County, California.

FOR FURTHER INFORMATION CONTACT: Mary Gray, Transportation Engineer, Federal Highway Administration, 980 9th Street—Suite 400, Sacramento, California 95814-2724, Telephone (916) 551-1310.

SUPPLEMENTARY INFORMATION: The FHWA, in cooperation with the California Department of Transportation and the Foothill/Eastern Transportation Corridor Agency (F/ETCA), will prepare an Environmental Impact Statement (EIS) on a proposal to locate and construct a limited access transportation facility with six lanes and a median of sufficient width for high-occupancy vehicles (HOV) or other transit considerations. Transportation improvements are needed to serve existing and planned development.

This facility, described as Route 241, will be an extension of Foothill Transportation Corridor (FTC) North. The first segment of the FTC is currently in operation between Portola Parkway North and Portola Parkway South. Another segment is under construction between Portola Parkway North and Antonio Parkway. The proposed project will begin at Oso Parkway and extend in a southerly direction to join the San Diego Freeway, I-5, near the Orange County/San Diego County line.

The highway is proposed as a toll facility and will include toll collection facilities on the mainline and on some entry/exit ramps. The toll facilities will be removed when revenue bonds issued for the project have been repaid. Alternatives being considered for the project include, but are not limited to: (1) New Highway Alternative. This involves locating and constructing six general traffic lanes with sufficient median width for high-occupancy vehicle (HOV) lanes/bus lanes or transit. An interchange with I-5 will be included in this alternative. (2) No Project. This alternative is essentially the "no build" option. Note: As required by the National Environmental Policy Act (NEPA), all other reasonable alternatives will be considered.

In November of 1985, Orange County began consultation with State and local agencies for the southern segment of the

exchanged or converted into a new class of shares ("New Target Class"), identical in all material respects to the Target Class as it existed prior to implementation of the proposal, no later than such shares previously were scheduled to convert into Target Class shares. If deemed advisable by the directors to implement the foregoing, such action may include the exchange of all existing Purchase Class shares for a new class ("New Purchase Class"), identical to existing Purchase Class shares in all material respects except that New Purchase Class shares will convert into New Target Class shares. New Target Class or New Purchase Class may be formed without further exemptive relief. Exchanges or conversions described in this condition shall be effected in any manner that the Directors reasonably believe will not be subject to federal taxation. In accordance with condition 4, any additional cost associated with the creation, exchange, or conversion of New Target Class or New Purchase Class shall be borne solely by the Adviser and the Distributor. Purchase Class shares sold after the implementation of the proposal may convert into Target Class shares subject to the higher maximum payment, provided that the material features of the Target Class plan and the relationship of such plan to the Purchase Class shares are disclosed in an effective registration statement.

16. Applicants will comply with the provisions of proposed Rule 6c–10 under the Act, Investment Company Act Release No. 16169 (Nov. 2, 1988), as currently proposed and as it may be reproposed, adopted, or amended.

For the SEC, by the Division of Investment Management, under delegated authority.

Margaret H. McFarland,

Deputy Secretary.

[FR Doc. 93–30696 Filed 12–15–93; 8:45 am]

BILLING CODE 8010–01–M

DEPARTMENT OF TRANSPORTATION

Coast Guard

[CGD 93–084]

Commercial Fishing Industry Vessel Advisory Committee; Meeting

AGENCY: Coast Guard, DOT.

ACTION: Notice of meeting.

SUMMARY: The Commercial Fishing Industry Vessel Advisory Committee (CFIVAC) will meet to discuss various issues. Agenda items include training, licensing, and casualty reporting requirements. The meeting will be open to the public.

DATES: The meeting will be held January 26 and 27, 1994, from 8:30 a.m. to 5 p.m. daily. Written material should be submitted not later than January 14, 1994.

ADDRESSES: The meeting will be held at the Long Beach Renaissance Hotel, 111 East Ocean Boulevard, Long Beach, CA 90802. Written material should be submitted to LCDR Mark Bobal, Executive Director, Commandant (G–MVI–4), U.S. Coast Guard, 2100 Second Street SW., Washington, DC 20593.

FOR FURTHER INFORMATION CONTACT: LCDR Mark Bobal, Executive Director, Commandant (G–MVI–4), U.S. Coast Guard, 2100 Second Street SW., Washington, DC 20593, telephone (202) 267–2307.

SUPPLEMENTARY INFORMATION: Notice of this meeting is given pursuant to the Federal Advisory Committee Act, 5 U.S.C. App. 2 section 1 et seq. The agenda will include discussion of the following topics:

(1) Coast Guard plans for licensing of Commercial Fishing Industry Vessel operators;
(2) Training required under 46 CFR 28.270 (Instruction, drills, and safety orientation);
(3) Briefing on the National Pollution Funds Center;
(4) Impact of the Memorandum of Understanding (MOU) between the Coast Guard and the Occupational Safety and Health Administration (OSHA);
(5) Review of Requirements for Commercial Fishing Industry Vessels in 46 part 28;
(6) Review of Navigations and Vessel Inspection Circular (NVIC) 5–86, Voluntary Standards for U.S. Uninspected Commercial Fishing Vessels;
(7) Issuance of Merchant Mariner Documents (MMD) to Fishing Industry Vessel personnel; and
(8) Fishing Industry Vessel casualty reporting requirements.

With advance notice, and at the discretion of the Chairman, members of the public may present oral statements at the meeting. Persons wishing to present oral statements should notify the CFIVAC Executive Director no later than the day before the meeting. Written statements or material may be submitted for presentation to the Committee at any time; however, to ensure distribution to each Committee member, 20 copies of the written material should be submitted to the Executive Director no later than January 14, 1994.

FOR FURTHER INFORMATION CONTACT: LCDR Mark D. Bobal, Merchant Vessel Inspection and Documentation Division Fishing Vessel/Offshore Activities Branch (G–MVI–4), room 1405, U.S. Coast Guard Headquarters, 2100 Second Street, SW., Washington, DC 20593–0001, (202) 267–2307.

Dated: December 8, 1993.

R.C. North,

Captain, U.S. Coast Guard, Acting Chief, Office of Marine Safety, Security and Environmental Protection.

[FR Doc. 93–30714 Filed 12–15–93; 8:45 am]

BILLING CODE 4910–14–M

Federal Highway Administration

Environmental Impact Statement: Los Angeles County, CA

AGENCY: Federal Highway Administration (FHWA), DOT.

ACTION: Notice of intent.

SUMMARY: The FHWA and FRA are issuing this notice to advise the public that an Environmental Impact Statement (EIS) will be prepared for a proposed highway improvement and railroad consolidation project in Los Angeles County, California, such project being known as the Alameda Corridor. This is a reissuance of a similar notice which was published in the **Federal Register** (Vol. 56, No. 4: Monday, January 7, 1991) and is now being reissued for reasons stated in the supplementary information described below. The Alameda Corridor project has complete environmental documentation requirements under the California Environmental Quality Act (CEQA) effective January 22, 1993, and therefore this notice reflects the intended preparation of an environmental document pursuant to the National Environmental Policy Act (NEPA) only.

FOR FURTHER INFORMATION CONTACT: Mary Gray, Transportation Engineer, Federal Highway Administration, 980 9th Street—suite 400, Sacramento, California 95814–2724, Telephone (916) 551–1310.

SUPPLEMENTARY INFORMATION: The FHWA and FRA, in cooperation with the California Department of Transportation (Caltrans) and the Alameda Corridor Transportation Authority (ACTA), will prepare an Environmental Impact Statement (EIS) on a proposed multi-modal transportation project located along the approximately 18-mile long Alameda Corridor in Los Angeles County, California. The fundamental purpose of the project is to provide the improvements necessary to consolidate freight rail service along the Alameda Corridor, so that efficiency of goods

Appendix H
Compton Truck Tunnel & Rail Cover Review

Compton Truck Tunnel & Rail Cover Review

A Review of the Proposal for a Truck Tunnel Bypass and Alameda Corridor Covered Rail Trench through the City of Compton.

Prepared by DMJM / M&N for the

Alameda Corridor Transportation Authority

April, 1995

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I. INTRODUCTION

On February 9, 1995 the Alameda Corridor Transportation Authority Governing Board passed a resolution directing the General Manager and Engineering Team to study and review a request from the City of Compton for a covered and depressed truck tunnel bypass and for a covered rail trench through the City of Compton. A letter requesting consideration of this proposal was issued by the City of Compton on February 7, 1995 and is included as *Appendix A*. This report has been prepared to summarize the engineering issues and costs identified during this evaluation and respond to the direction of the ACTA Governing Board.

Background

Variations of the Compton proposal have been previously studied by ACTA and the Engineering Team. A depressed exclusive truckway was considered and rejected by ACTA during the original Concept Study because of lower than anticipated truck traffic forecasts north of Route 91 and high costs.

In early 1994, a proposal for a covered truck tunnel through Compton was referred to an ACTA Technical Working Group. Following studies of the proposal, the Technical Working Group voted to reaffirm the project definition adopted by the Governing Board on January 13, 1993 known as the Locally Preferred Alternative 2.1B. This alternative provides for a depressed trainway through Compton, with the reconstruction of Alameda Street in its existing configuration with added turn lanes and improved traffic signals.

The Technical Working Group also recommended that ACTA explore other options to enhance and preserve the Compton Central Business District and work with SCAG on their upcoming Truck Study to further address Compton's concerns regarding truck volumes on Alameda Street within the Compton area.

Scope of Study

The purpose of the evaluation is to take a fresh look at the Compton proposal and identify issues, costs and impacts on the Alameda Corridor Project; and to provide a report to the ACTA Governing Board summarizing the results of this review. The objectives of the study were established to clarify and define the specific Compton proposal and to focus on the technical considerations arising from the proposed truck tunnel and rail cover. Where feasible, issues have been quantified to aid in evaluation.

This report is intended to provide an overview of the range of likely costs and engineering issues associated with the Compton proposal and does not provide detailed engineering analysis or design. Cost estimates are based on assumed unit costs similar to those used for the Alameda Corridor Project and contingencies have been included commensurate with the conceptual nature of this study. Detailed engineering studies are recommended should a determination be made to proceed with any of the alternatives discussed in this report.

II. METHODOLOGY

The study methodology was to first clarify and define the Compton proposal and to develop an engineering concept. This was accomplished by meeting with City of Compton representatives on February 16, 1995 to obtain input on the scope and definition of the proposed truck tunnel and rail cover limits and to overview and obtain input on design issues. The preliminary assessment identified the truck tunnel portal location and configuration as a key element of the proposal concept. The City requested that the study include an exclusive truck bypass tunnel through the Compton Central Business District from approximately Greenleaf Boulevard to Rosecrans Avenue with the tunnel portals transitioning to match existing cross sections solely within the City of Compton limits. The City proposal further included a covered railway section from

Alondra Boulevard to Rosecrans Avenue with appropriate urban design treatment. An engineering concept was prepared from this input and engineering studies initiated.

The City indicated several concerns with the Alameda Corridor rail trench which they hoped to address with the truck tunnel and rail cover including:

- Safety concerns regarding preventing unauthorized access to the trench section, especially children
- Fencing or walls along the trench creating a visual barrier or wall dividing the community
- Mitigate traffic congestion due to expected increases in truck volumes along Alameda Street
- Opportunity to enhance Compton Central Business District

An interim progress report was given to the ACTA Board on March 9, 1995 summarizing the study status and further steps remaining.

From the refined proposal concept, an analysis was made to identify potential issues and estimate approximate benefits and costs associated with the truck tunnel and rail cover. This analysis identified two alternative geometric configurations for the proposed truck tunnel bypass with varying costs and right-of-way impacts. The analysis further identified design and construction considerations and impacts to the community. An assessment of the benefits and impacts on traffic circulation and projected truck volumes was made based on the forecasts and modeling prepared for ACTA in the *Highway Capacity Study Report* prepared by DKS Associates in September, 1991.

A workshop meeting was held with Compton representatives on April 5, 1995 to discuss the preliminary findings of the engineering evaluation and to obtain further comments and input. The workshop identified a number of technical issues which could negatively impact Compton and the City requested that the Engineering Team evaluate variations of the rail trench cover without the truck bypass tunnel. (See attached letters in *Appendix B.*)

The findings of the technical evaluation studies have been summarized in this report and submitted to the Governing Board of the Alameda Corridor Transportation Authority.

III. PROJECT DESCRIPTION

Alternative 1

Based on input from the first Compton meeting, the basic configuration of the truck bypass tunnel was established as a four-lane (two each direction) depressed section with median entrance/exit portals at each end as shown in Figure 1 - *Compton Truck Tunnel Typical Sections.* The portals or tunnel entrance/exits were located between Rosecrans Avenue and Carson Place on the north end and Tichenor Street and Greenleaf Boulevard on the south end. The tunnel length is approximately 4,600 feet. Single lane entrance and exit ramps were chosen to minimize right-of-way impacts at the portal areas, expanding to the four-lane configuration within the tunnel section. The Alternative 1 Concept Plan configuration is shown in Figure 2. The approximate portal length was established to maintain safe stopping sight distances for a 50 mph design speed typically used for similar facilities and a maximum grade of 4%. Trucks would enter/exit the tunnel portals from the median or left lanes. The Alameda Street southbound lanes were shifted approximately 44 feet westerly adjacent to the portal to accommodate the median entrance/exit as shown. This would require additional right-of-way along the west side of Alameda Street.

As shown on the plan view, the portal location would conflict with the Elm Street crossing eliminating Alameda Street left turns at Elm and Elm Street through movements. All other crossing locations would be maintained.

The depressed trainway was covered from approximately Elm Street to Bennett Street (approximately 7000 feet). It was determined that due to safety considerations, a full structural cover or continuous bridge section was recommended to prevent possible collapse from inadvertent or unauthorized vehicle loads. The covered trainway and truck tunnel were separated

with a continuous structural support wall. Because vertical clearance requirements are less for trucks than rail, the truck tunnel floor elevation is approximately 10 feet higher than the rail trench floor.

Alternative 2

Due to the impact of additional right-of-way requirements, the engineering team identified a second alternative configuration which shifted the northbound lanes over onto an extended rail cover. The tunnel entrance/exit ramps and portal were also shifted eastward adjacent to the depressed trainway section, reducing the additional right-of-way required along the west side of Alameda Street. This option is shown in Figures 3 and 4 - *Portal Typical Section and Alternative 2 Concept Plan*, respectively. This alternative required the extension of the rail cover to Rosecrans Avenue on the north end and Greenleaf Boulevard on the south end (approximately 8000 feet overall).

Similar to the first alternative, Alternative 2 also requires the closure of Elm Street to through traffic and the elimination of left turns from Alameda Street.

IV. ENGINEERING ANALYSIS

The construction of a truck tunnel and rail cover through Compton would result in a number of impacts and issues different and beyond those of the Alameda Corridor project. These include construction impacts, facility requirements, right-of-way impacts, regulatory and operation and maintenance requirements and environmental issues. The following sections address impacts and issues in each of these areas.

Construction Phasing

The construction of the truck tunnel bypass would require the closure of segments of Alameda Street to permit cut and cover construction of the tunnel section. In order to minimize impacts from closing these segments, the recommended phasing would be to construct the rail trench and

cover first and then shift traffic onto the covered trainway and East Alameda Street to permit construction of the truck tunnel.

The following construction sequence would be recommended:

- Construct the rail trench and cover.
- Relocate northbound/southbound traffic onto the rail cover and east barrel of Alameda Street.
- Close segments of West Alameda Street to permit construction while minimizing disruption to local driveways and turning movements.
- Construct the truck tunnel segments and reconstruct West Alameda Street, minimizing driveway and cross street closures.
- Open Alameda Street and the truck tunnel.
- Develop compatible rail cover area uses.

This construction sequence provides for the minimum disruption to through traffic along Alameda Street, however it will still be necessary to close local driveway access and other turning movements during the periods when construction is occurring in those areas.

Construction of the truck tunnel would have significantly greater impacts on local access and circulation than the rail trench construction and would result in a longer construction period. Driveway and cross street closures of three to four months should be expected.

The construction of the rail cover and truck tunnel would likely add a minimum of 12 months to the schedule for revenue operation of the Alameda Corridor and a minimum of two years to the overall construction schedule.

The construction sequence is compatible, however, with the future construction of the truck tunnel and rail cover as separate project, while maintaining operational rail traffic on the Alameda Corridor.

Right-of-Way Acquisition

Although both alternative alignments for the truck tunnel require additional right-of-way to accommodate the tunnel portal widening, Alternative 2 would result in significantly less impacts and fewer affected parcels. Alternative 1 would require additional right-of-way varying in width up to approximately 40 feet along the west side of Alameda Street from Rosecrans Avenue to Compton Boulevard and from Alondra Boulevard to Greenleaf Boulevard. As indicated in Figure 2, approximately 50 parcels including numerous existing businesses would be impacted.

Alternative 2 reduces the additional right-of-way requirement by shifting northbound Alameda Street onto the rail trench cover. The maximum required width is reduced to approximately 10 feet affecting approximately 20 parcels and avoiding a number of existing buildings.

Construction of either alternative will result in the need for additional right-of-way and the displacement of existing businesses. No additional right-of-way is required for the Alameda Corridor project in this area.

Ventilation Requirements

Generally, positive ventilation is required for vehicle tunnels longer than 500 feet to maintain air quality within the tunnel section. The American Railway Engineering Association (AREA) Manual recommends consideration of positive ventilation systems for freight-only railroad tunnels longer than 2,500 feet for rail operational issues. Local air quality standards and conditions may impose stricter requirements due to the concentration of air pollutants. Both the truck bypass tunnel and the covered rail section would be considered "tunnels" for ventilation and air quality purposes, requiring mechanical or forced ventilation systems. The exhaust constituent of greatest concern is carbon monoxide (CO), because of its notorious asphyxiant nature. The ventilation system forces fresh air into the tunnel to dilute the CO content to safe and comfortable levels. In addition, oxygen starvation of diesel locomotive engines controls ventilation design for rail tunnels.

Current EPA standards recommend 200 to 300 cfm per lane foot ventilation rates for trucks operating in tunnels. This results in approximately 700,000 cubic feet per minute ventilation rate

to maintain acceptable CO levels. This translates to approximately 3 to 4 ventilation equipment buildings to house fans and control equipment. 250+ HP fans would be required at each location to meet recommended ventilation rates. Exhaust locations would be diffused or raised to minimize noise and air quality impacts. Ventilation equipment buildings would be spaced along the tunnel to maximize efficiency of air handling. Location of ventilation systems and facilities will need to consider local conditions, right-of-way availability and adjacent land uses.

A separate ventilation system is recommended for the covered rail section due to differences in tunnel lengths, ventilation rate requirements, air quality characteristics and emergency response requirements. Air contaminants are more concentrated for rail tunnels, but tend to spike over short periods with less overall quantity. In addition rail tunnels benefit from greater "piston effect" resulting in a higher level of natural tunnel ventilation.

Mechanical ventilation systems for both the truck tunnel and rail covered section introduce requirements for equipment, ongoing operation and maintenance costs and environmental issues beyond those of the Alameda Corridor project.

Noise & Aesthetics

The noise and aesthetic impacts of the truck tunnel and covered rail trench section result in different noise and aesthetic impacts than the Alameda Corridor project. The Alameda Corridor project does not affect truck noise along Alameda Street, based on ambient noise from moving vehicles since the existing Alameda Street configuration would be maintained. The truck tunnel and covered rail section would reduce truck and rail generated noise and vibration through the tunnel sections, however truck and rail noise will tend to increase at the portal areas. In addition, the mechanical ventilation systems will introduce continuous noise due to running motors and air movement at the equipment buildings.

Aesthetic issues would need to be addressed with respect to the ventilation and equipment buildings and exhaust systems to minimize impacts on adjacent commercial activities.

Trench Access

A rail trench access road for emergency response and maintenance access was proposed between Compton and Alondra Boulevards. Both the rail trench cover and truck tunnel would require the elimination and/or relocation of this access. The access was located here due to the wider existing rail right-of-way and distance between rail trench crossings. If relocated to another location along the corridor, additional right-of-way would be required.

Due to the proximity to the southern trench end where access is also available, it is recommended that the access be eliminated if the rail trench cover or truck tunnel is constructed. Vehicle access would remain at both ends, with intermediate personnel access points along the corridor.

Regulatory Issues

The primary regulatory issue associated with the truck tunnel and rail cover proposal is air quality. The tunnel ventilation systems are considered Point Source or Stationary Emission generators and fall under different regulatory and air quality permitting requirements. Southern California Air Quality Management District permits and regular monitoring and control devices may be required for stationary emission sources. A thorough study of permitting requirements should be accomplished prior to proceeding with these proposals.

Fire and Life Safety

The truck tunnel and rail cover section will need to include systems for operations, security, surveillance and emergency response. Incident detection equipment such as video surveillance and traffic movement detectors are recommended for modern vehicle tunnels. Life safety systems, including emergency ventilation, lighting and incident reporting stations will be required.

Emergency responses to fires, hazardous material spills, accidents, rescues and other incidents in tunnel sections requires specialized training and equipment. Cleanup and repair costs following

accidents or derailments are considerably higher and more dangerous within tunnel environments.

Operation and Maintenance

The proposed truck tunnel and rail cover will impose on-going operation and maintenance requirements and costs for the mechanical ventilation systems, security and surveillance systems and tunnel lighting. Tunnel lighting requirements are significantly greater than normal street lighting levels at the tunnel portals due to lighting contrast during daylight hours. Ventilation and lighting systems must be operated 24 hours per day resulting in significant operating costs. Equipment maintenance and funding replacement reserves for large motors, electrical switchgear, fans and electrical systems also add to O&M costs for the tunnel operator.

Traffic Projections

Projected truck usage of the Tunnel Bypass has been estimated based on the Alameda Consolidated Transportation Corridor *Highway Capacity Study Report* prepared in 1991 by DKS. That study segregated traffic by car and truck for each of the study alternatives for each segment. Between SR 91 and I-105, existing average PM peak traffic volumes are 2000 vehicles per hour with 60 trucks per hour. For the Depressed Rail Alternative (6-lane Alameda Street), forecast PM peak hour volumes were expected to increase to 6,870 vehicles with 280 trucks by 2020. For the Depressed Rail and Truck Expressway Alternative, the projected volumes were 7,540 vehicles with 300 trucks, respectively. Trucks account for approximately 5% of all vehicles in this segment.

An Origin-Destination study was performed concurrently with the *Capacity Study Report*. This study estimated that approximately one-third of the trucks in this segment are Port related. Based on this data, we have estimated that approximately 80% of the North & Southbound Alameda Street trucks or approximately 240 trucks per hour in the PM peak would utilize the truck bypass. Due to the relatively short tunnel section, it is unlikely that a significant amount of truck diversions from other routes to the Alameda Street bypass would occur. Affects would likely be limited to the immediate adjacent communities and street routes.

Intersection Level of Service at the Compton Boulevard and Alondra Boulevard intersections would be expected to improve somewhat. However, due to the relative number of trucks, this benefit is limited. Existing Level of Service (LOS) at Compton and Alondra were A & B respectively. However, under both project alternatives (with and without the truck expressway) LOS is expected to decrease to D & F for Compton and Alondra, respectively, by the year 2010. LOS definitions are included as Appendix D.

V. COSTS

Preliminary estimates have been prepared to provide an order of magnitude indication only of the likely costs of the proposed concept for the truck tunnel and covered rail section through Compton. The estimates have been prepared based on unit costs similar to those used for the Alternative 2.1B Locally Preferred Alternative and are in addition to the conventional rail trench in Alternative 2.1B. A contingency allowance of 25% has been included due to the conceptual nature of the engineering development.

Table 1 indicates an overall cost for Alternative 1 of approximately $270 million for the rail cover and truck tunnel bypass. This includes approximately $26.5 million for right-of-way acquisition and impacts.

Table 2 for Alternative 2 shows an overall cost of approximately $261 million, due to reduced right-of-way acquisition costs, but offset somewhat due to higher rail cover structure costs. The approximate cost of the rail cover only as proposed in Alternative 1 is $90 million as shown in Table 3.

VI. OTHER ALTERNATIVES

Following the Compton Workshop, the City requested that the engineering team evaluate other alternative configurations of the proposed rail cover in order to reduce costs while maintaining the overall objectives of restricting access and providing opportunities for urban design

improvements. (*See correspondence Appendix B.*) The requested alternative would include a complete cover from Palmer Street to Laurel Street (approximately 1,600 feet) or from Elm Street to Myrrh Street (approximately 3,000 feet), with maximum treatment possible at each of the other crossing locations within the City. In addition, the City has requested consideration of a bikeway and equestrian trail along the Alameda Corridor. This should be considered within the context of an area wide plan for bikeways and equestrian trails. These features can be incorporated into each of the alternatives at minimal cost if sufficient right-of-way is available.

For cover lengths less than 2, 500 feet, positive ventilation would not be required for rail operations. However, SCAQMD air quality standards may be exceeded at the cover ends due to concentration of CO and other combustion pollutants. In order to determine the maximum cover length and necessary spacing to avoid air quality issues will require additional detailed air quality modeling.

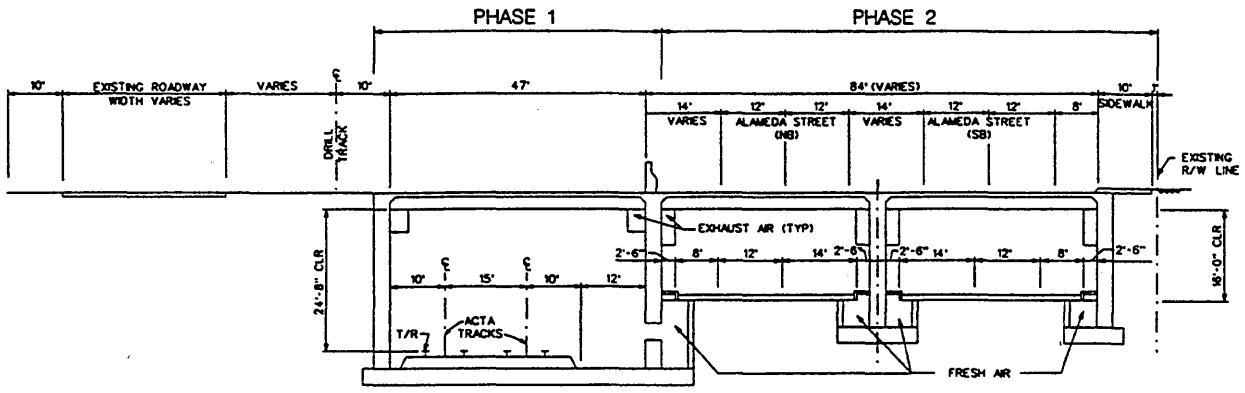
Assuming that cover lengths and opening maintain compliance with air quality requirements, the unit cost of the extended cover sections would be similar to those of the bridge crossing structures, plus budgeted allowances for appropriate urban design features as requested. Depending on the final configuration, additional costs for the alternative rail cover proposal would range from $25 to $40 million.

VII. SUMMARY

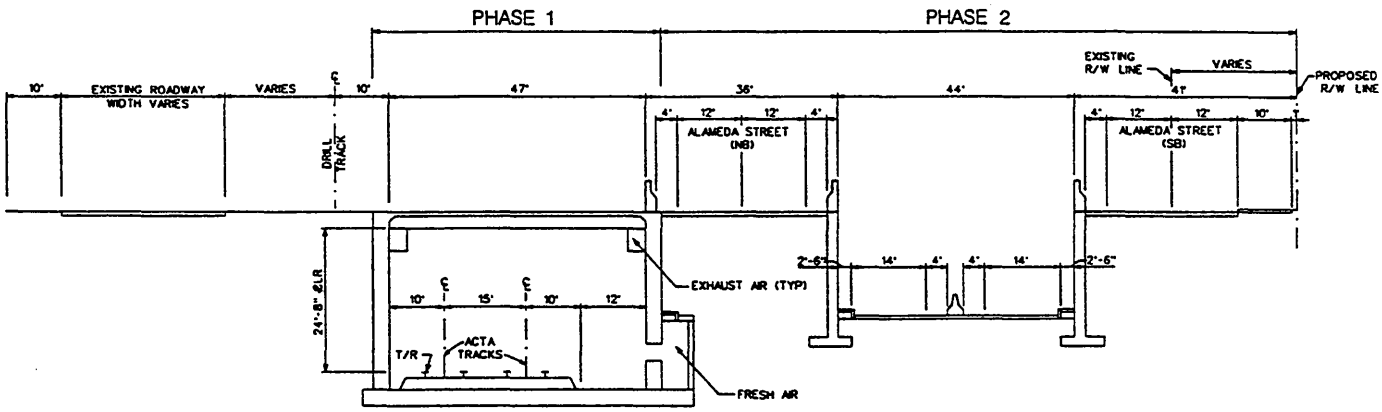
This review of the Compton request for a truck bypass tunnel and rail cover through the City's Central Business District has identified a number of technical and cost issues. The most significant are listed below:

- The proposed truck tunnel and rail cover section will impose greater construction impacts and disruptions on local businesses and residents.
- Additional right-of-way would be required for the truck tunnel adjacent to the portal sections.
- The tunnel sections will impose new air quality regulatory permit requirements for stationary emission source not required for the Corridor Project.
- Emergency response to incidents in tunnel sections requires specialized systems, equipment and training.
- On-going Operation and Maintenance costs and responsibilities for the tunnel sections are significant.
- The estimated cost of the proposed truck tunnel and rail cover is approximately $260-$270 million.
- The truck tunnel will provide only minor LOS improvements along Alameda Street.
- The construction of the Alameda Corridor Project Alternative 2.1B would not preclude the subsequent construction of the rail cover or truck tunnel in the future as a separate project when funding became available.

This study has provided an overview of the costs and issues associated with the proposed Truck Tunnel and Rail Cover. It does not provide detailed engineering analysis or design. Further engineering studies are necessary to proceed with any of the alternatives discussed in this report



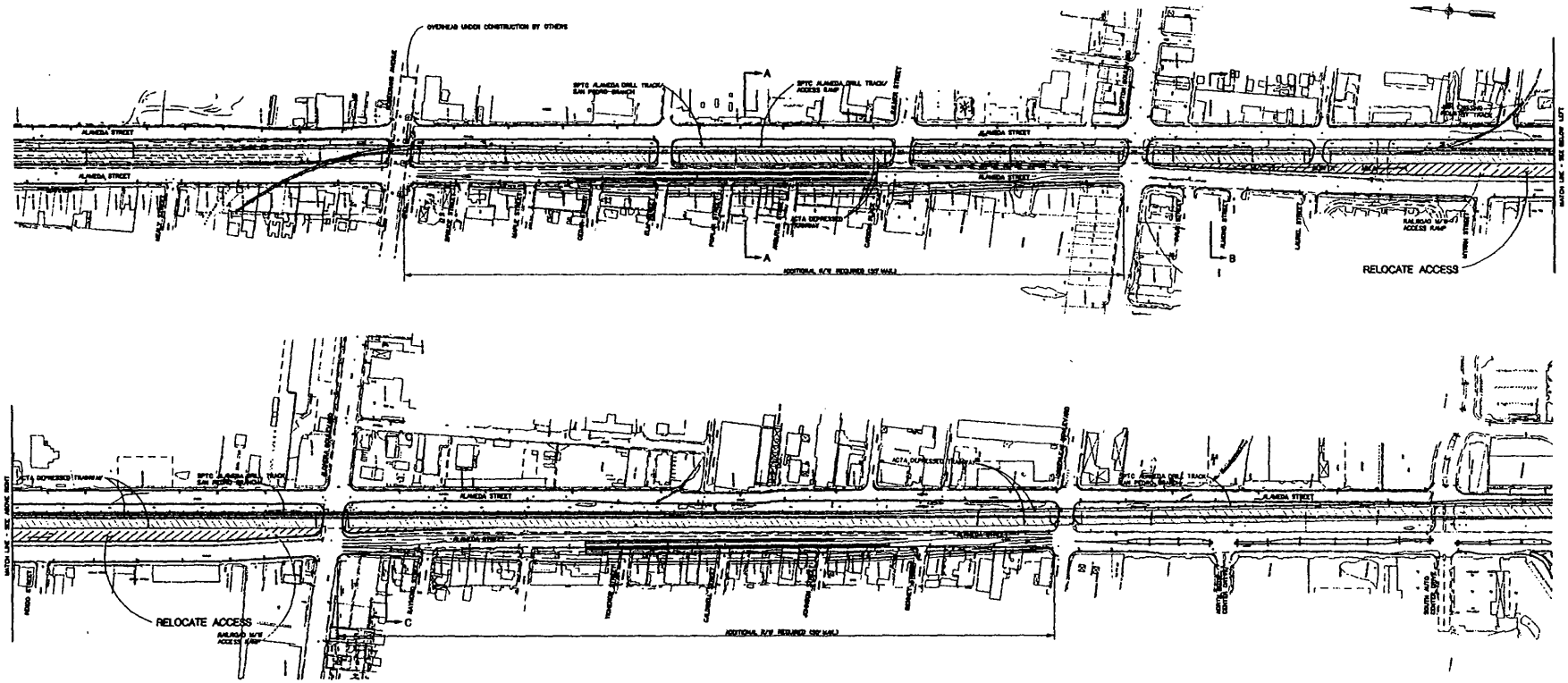
SECTION B – B



SECTION A – A

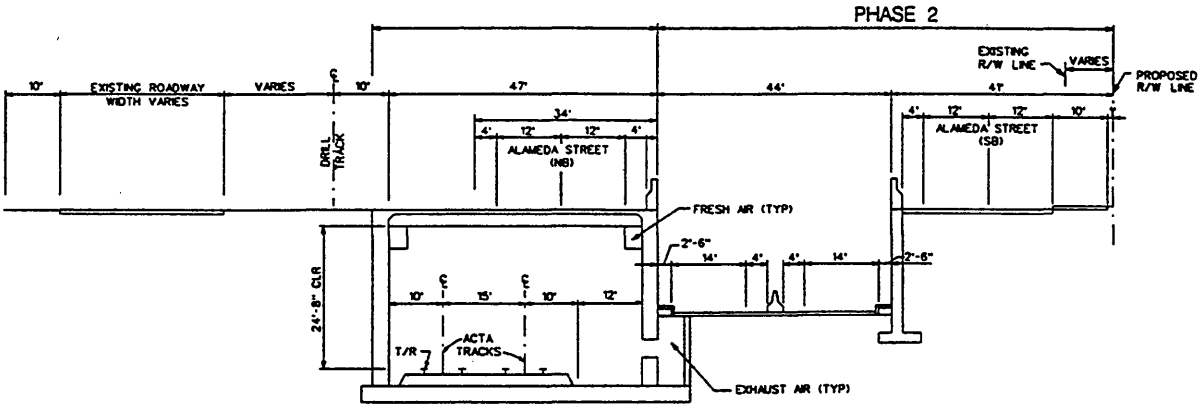
FIGURE 1
TYPICAL SECTIONS

ALTERNATIVE 1
COMPTON TRUCK TUNNEL AND RAIL COVER EVALUATION



ALTERNATIVE 1

FIGURE 2
COMPTON TRUCK TUNNEL
AND RAIL
COVER EVALUATION



SECTION C – C

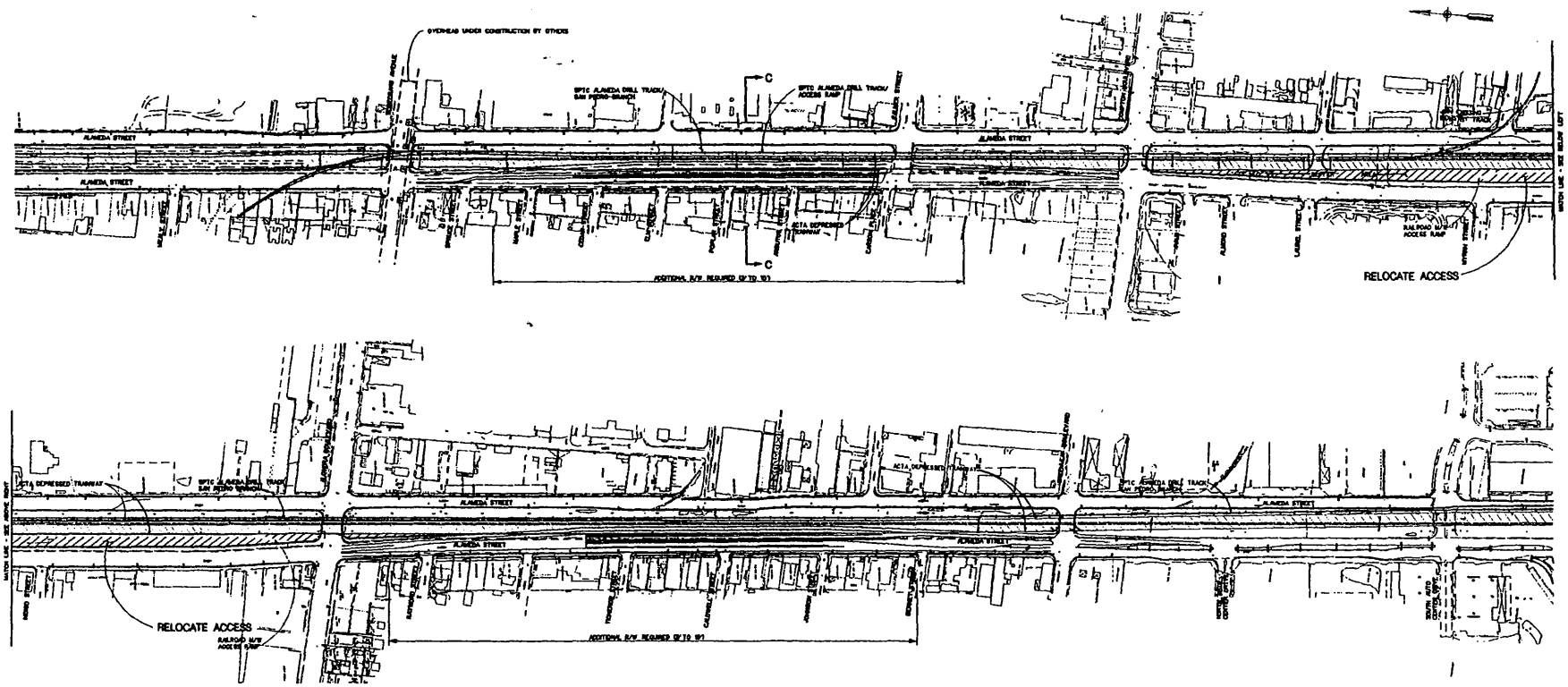
FIGURE 3

PORTAL TYPICAL SECTION

ALTERNATIVE 2

COMPTON TRUCK TUNNEL AND RAIL COVER EVALUATION

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ALTERNATIVE 2

FIGURE 4
COMPTON TRUCK TUNNEL
AND RAIL
COVER EVALUATION

COMPTON TRUCK TUNNEL EVALUATION

ALTERNATIVE NO.1 CONSTRUCTION COST SUMMARY

ITEM	QUANTITY	UNITS	UNIT PRICE	TOTAL
Roadway and Structures:				
Excavation & Grading	450,000	Cu Yd	$20	$9,000,000
Finish Roadway	73,000	Sq Yd	$65	$4,745,000
Tunnel Structure	4,600	Ln Ft	$9,000	$41,400,000
Portal Structures	3,200	Ln Ft	$2,000	$6,400,000
Lighting, Security & Surveillance	1	Lump Sum	$8,000,000	$8,000,000
ACTA Trainway Structure Cover	7,000	Ln Ft	$7,000	$49,000,000
SUBTOTAL				$118,545,000
Ventilation System:				
ACTA Trainway Ventilation System	1	Lump Sum	$2,000,000	$2,000,000
Truck Tunnel Ventilation System	1	Lump Sum	$5,000,000	$5,000,000
SUBTOTAL				$7,000,000
Utility Relocation and Protection				
Relocation	27,000	Ln Ft	$210	$5,670,000
Protection	27,000	Ln Ft	$65	$1,755,000
SUBTOTAL				$7,425,000
Traffic Management				
Construction Traffic Management	1	Lump Sum	$6,500,000	$6,500,000
SUBTOTAL CONSTRUCTION				$139,470,000
Mobilization (10%)				$13,947,000
TOTAL CONSTRUCTION				$153,417,000
Right-of-Way Acquisition				
Land	400000	Sq Ft	25	$10,000,000
Improvements	150000	Sq Ft	$85	$12,750,000
Clearance & Demolition	1	Lump Sum	$1,800,000	$1,800,000
Relocaton Assistance	1	Lump Sum	$1,912,500	$1,912,500
SUBTOTAL				$26,462,500
TOTAL CONSTRUCTION & RIGHT-OF-WAY				$179,879,500
Professional Services (20%)				$35,975,900
TOTAL				$215,855,400
Contingency (25%)				$53,963,850
GRAND TOTAL				$269,819,250

Table 1

FILE: TUNALT1.WK3

COMPTON TRUCK TUNNEL EVALUATION

ALTERNATIVE NO.2 CONSTRUCTION COST SUMMARY

ITEM	QUANTITY	UNITS	UNIT PRICE	TOTAL
Roadway and Structures:				
Excavation & Grading	450,000	Cu Yd	$20	$9,000,000
Finish Roadway	73,000	Sq Yd	$65	$4,745,000
Tunnel Structure	4,600	Ln Ft	$9,000	$41,400,000
Portal Structures	3,200	Ln Ft	$2,000	$6,400,000
Lighting, Security & Surveillance	1	Lump Sum	$8,000,000	$8,000,000
ACTA Trainway Structure Cover	8,500	Ln Ft	$7,000	$59,500,000
SUBTOTAL				$129,045,000
Ventilation System:				
ACTA Trainway Ventilation System	1	Lump Sum	$2,000,000	$2,000,000
Truck Tunnel Ventilation System	1	Lump Sum	$5,000,000	$5,000,000
SUBTOTAL				$7,000,000
Utility Relocation and Protection				
Relocation	27,000	Ln Ft	$210	$5,670,000
Protection	27,000	Ln Ft	$65	$1,755,000
SUBTOTAL				$7,425,000
Traffic Management				
Construction Traffic Management	1	Lump Sum	$6,500,000	$6,500,000
SUBTOTAL CONSTRUCTION				$149,970,000
Mobilization (10%)				$14,997,000
TOTAL CONSTRUCTION				$164,967,000
Right-of-Way Acquisition				
Land	180000	Sq Ft	25	$4,500,000
Improvements	40000	Sq Ft	$85	$3,400,000
Clearance & Demolition	1	Lump Sum	$810,000	$810,000
Relocaton Assistance	1	Lump Sum	$510,000	$510,000
SUBTOTAL				$9,220,000
TOTAL CONSTRUCTION & RIGHT-OF-WAY				$174,187,000
Professional Services (20%)				$34,837,400
TOTAL				$209,024,400
Contingency (25%)				$52,256,100
GRAND TOTAL				$261,280,500

FILE: TUNALT1.WK3

Table 2

COMPTON TRUCK TUNNEL EVALUATION

RAIL COVER ONLY COST ESTIMATE

ITEM	QUANTITY	UNITS	UNIT PRICE	TOTAL
Roadway and Structures:				
Excavation & Grading	0	Cu Yd		$0
Finish Roadway	0	Sq Yd		$0
Tunnel Structure	0	Ln Ft		$0
Portal Structures	0	Ln Ft		$0
Lighting, Security & Surveillance	1	Lump Sum	$1,500,000	$1,500,000
ACTA Trainway Structure Cover	7,000	Ln Ft	$7,000	$49,000,000
SUBTOTAL				$50,500,000
Ventilation System:				
ACTA Trainway Ventilation System	1	Lump Sum	$2,000,000	$2,000,000
Truck Tunnel Ventilation System	0	Lump Sum		$0
SUBTOTAL				$2,000,000
Utility Relocation and Protection				
Relocation	4,500	Ln Ft	$210	$945,000
Protection	4,500	Ln Ft	$65	$292,500
SUBTOTAL				$1,237,500
Traffic Management				
Construction Traffic Management	1	Lump Sum	$1,000,000	$1,000,000
SUBTOTAL CONSTRUCTION				$54,737,500
Mobilization (10%)				$5,473,750
TOTAL CONSTRUCTION				$60,211,250
Right-of-Way Acquisition				
Land		Sq Ft		$0
Improvements		Sq Ft		$0
Clearance & Demolition		Lump Sum		$0
Relocaton Assistance		Lump Sum		$0
SUBTOTAL				$0
TOTAL CONSTRUCTION & RIGHT-OF-WAY				$60,211,250
Professional Services (20%)				$12,042,250
TOTAL				$72,253,500
Contingency (25%)				$18,063,375
GRAND TOTAL				$90,316,875

Table 3

FILE: TUNALT1.WK3

OFFICE OF THE CITY MANAGER
205 South Willowbrook Avenue
Compton, California
(310) 605-5580
FAX (310) 631-0322

OMAR BRADLEY
Mayor

COUNCIL MEMBERS
RONALD J. GREEN, Dist. 1
MARCINE SHAW, Dist. 2
YVONNE ARCENEAUX, Dist. 3
JANE D. ROBBINS, Dist. 4

HOWARD CALDWELL
City Manager

February 7, 1995

Honorable Tom Jackson
Chairman, Alameda Corridor Transportation Authority
6550 Miles Avenue, No. 113
Huntington Park, California 90255

Re: Alameda Corridor Project/Rejection of Depressed Roadway Alternative

Dear Mr. Jackson:

It is my understanding that a meeting of the Governing Board of the Alameda Corridor Transportation Authority ("ACTA") has been scheduled for this Thursday, February 9, 1995, and that among the actions to be taken at this meeting is the formal rejection of a covered depressed trainway and roadway alternative for the Alameda Corridor Project. I am writing to you to express my extreme disappointment and disagreement with any such action and to urge ACTA to reconsider its decision to reject this alternative.

The Alameda Corridor Project has been in the making for nearly fourteen years now. Throughout this period, the City of Compton has been actively involved in the project, including participating on the Governing Board of ACTA, in an attempt to ensure that the numerous social, economic and environmental impacts associated with the project receive fair and adequate consideration. While supporting the general concept of a consolidated corridor for the transport of goods from the San Pedro Bay Ports to distribution points in the City of Los Angeles, the City repeatedly has raised legitimate concerns regarding the project's impacts and has suggested possible ways to mitigate these impacts.

All too often, however, the City's concerns and suggestions have been either totally ignored or dismissed out of hand by ACTA. A prime example of this is ACTA's treatment of the City's contention that a covered depressed trainway and roadway alternative should be studied as part of the project. Under this alternative, a depressed roadway and railway would be built with a cover, providing direct access to and from the San Pedro Bay Ports for trains, trucks and other cargo-carrying vehicles. This alternative would further many of the goals of the Alameda Corridor project and enhance the project's value by providing a truly

Appendix A

consolidated corridor between Los Angeles and the San Pedro Bay Ports. Moreover, it would prevent Alameda Street from becoming a thoroughfare for heavy commercial traffic, which is very likely to occur if the proposed project is built as planned.

Despite the obvious potential benefits of such an alternative, ACTA summarily rejected this potential alternative in response to the City's written comments on the Draft Environmental Impact Report for the project, the scoping comments for the Environmental Impact Statement and the City's resolution establishing said alternative. ACTA's purported rationale for doing so was that a covered depressed trainway and roadway alternative was "too costly". Yet ACTA came to this conclusion without the benefit of any studies, investigations or assessments analyzing the economic feasibility of such an alternative.

Under both the National Environmental Policy Act, 42 U.S.C. S 4321, et seq. ("NEPA") and the California Environmental Quality Act, Public Resources Code S 21000 et seq. ("CEQA"), the analysis of alternatives is considered "the heart" of the environmental review process. To this end, both NEPA and CEQA require that agencies consider a reasonable range of alternatives to a proposed project. This requires more than mere lip service, however. Agencies must "rigorously explore and objectively evaluate all reasonable alternatives", and " devote substantial treatment to each alternative considered in detail including the proposed action so that reviewers may evaluate their comparative merits". 40 C.F.R. S 1502.14; see also, Pub. Res. Code S 21002. ACTA's summary rejection of the covered depressed trainway and roadway alternative without the benefit of any data regarding its economic feasibility clearly violates both the spirit and the letter of NEPA and CEQA.

The Governing Board's formal rejection of this alternative on Thursday, February 9, 1995, will only serve to exacerbate this deficiency by putting an official imprimatur on a determination which had little basis in fact or in law. Thus, on behalf of the City of Compton, I once again urge ACTA to reconsider its decision to reject consideration of a covered depressed trainway and roadway alternative for the Alameda Corridor Project and ask that ACTA allocate the funds necessary to study the economic viability of this alternative. Only by conducting such a study can any decision to reject this alternative be said to be the result of rational, informed decisionmaking on the part of ACTA, as required under NEPA and CEQA.

Finally, I want to remind you that as a joint powers agency, ACTA's purpose is to address the needs and concerns of all of its

members. ACTA should demonstrate its commitment to this purpose by considering in earnest the covered depressed trainway and roadway alternative, particularly since the City of Compton and several other communities stand to be disproportionately impacted by the Alameda Corridor Project.

Therefore, it is my request, with the consensus of the Compton City Council, that the ACTA Board take the following actions:

1. Direct ACTA staff to prepare the necessary documents to include the covered depressed trainway and roadway as an alternative in the Environmental Impact Report and Environmental Impact Statement for the Alameda Corridor Project.

2. Prepare the appropriate studies to fairly analyze and evaluate the City's alternative.

3. Prepare the studies identified by the City of Compton in its comments to the Environmental Impact Report and scoping comments for the Environmental Impact Statement (see attached).

4. Establish a mitigation measure for addressing the increased freight train traffic on the Wilmington Branch (Willowbrook Avenue) during and after construction of the Alameda Corridor.

5. Prepare a plan to mitigate the potential adverse financial impacts of the Alameda Corridor on existing businesses and land uses.

6. Conduct a local circulation study to analyze and address the impact of the Alameda Corridor on traffic flow within the City of Compton.

If you have any questions or wish to discuss this matter further, please do not hesitate to contact me.

Sincerely,

OMAR BRADLEY
MAYOR OF THE CITY OF COMPTON

OFFICE OF THE CITY MANAGER
205 South Willowbrook Avenue
Compton, California
(310) 605-5580
FAX (310) 631-0322

OMAR BRADLEY
Mayor

COUNCIL MEMBERS
RONALD J. GREEN, Dist. 1
MARCINE SHAW, Dist. 2
YVONNE ARCENEAUX, Dist. 3
JANE D. ROBBINS, Dist. 4

HOWARD CALDWELL
City Manager

April 7, 1995

Duane L. Kenagy, PE and David T. Mazzo, PE
DMJM-MN
One Civic Plaza
Suite 400
Carson, CA 90745

Dear Gentlemen:

I am writing following our meeting on Wednesday, April 5, to provide a list of locations that should be included in the third alternative for the treatment of the Alameda Corridor Rail Project in the Compton Central Business District. Each of the crossings at the locations listed should receive the maximum treatment possible, including the widest covering of the depressed rail way, and appropriate urban design elements and landscaping.

1. Elm Street

2. Compton Boulevard

3. Alondra Boulevard

This list is tentative, and I will call on Monday, April 10 to confirm the list of locations. Thank you for your assistance.

Sincerely,

Reggie Tabor
Special Assistant to the City Manager
City of Compton

Appendix "B"

OFFICE OF THE CITY MANAGER
205 South Willowbrook Avenue
Compton, California
(310) 605-5580
FAX (310) 631-0322

OMAR BRADLEY
Mayor

COUNCIL MEMBERS
RONALD J. GREEN, Dist. 1
MARCINE SHAW, Dist. 2
YVONNE ARCENEAUX, Dist. 3
JANE D. ROBBINS, Dist. 4

HOWARD CALDWELL
City Manager

AMENDED

April 17, 1995

Duane L. Kenagy, PE and David T. Mazzo, PE
DMJM-MN
One Civic Plaza
Suite 400
Carson, CA 90745

Dear Gentlemen:

I am writing following our meeting on Wednesday, April 5, and the fax sent April 7, to provide an updated list of locations that should be included in the third alternative for the treatment of the Alameda Corridor Rail Project in the Compton Central Business District. Each of the crossings at the locations listed should receive the maximum treatment possible, including the widest covering of the depressed rail way, and appropriate urban design elements and landscaping. A proposal should include a complete cover from Elm Street to Myrrh Street (approximately 3,000 feet) or Palmer Street to Laurel Street (approximately 1,600 feet).

1. El Segundo Boulevard (City Entrance/Gateway)
2. Rosecrans Avenue
3. Elm Street
4. Palmer Street
5. Compton Boulevard
6. Myrrh Street (Also connect existing East and West and eliminate crossing North of Myrrh Street)
6. Alondra Boulevard
7. Greenleaf Boulevard

Thank you for your assistance.

Sincerely,

Reggie Tabor

Reggie Tabor

OFFICE OF THE CITY MANAGER
205 South Willowbrook Avenue
Compton, California
(310) 605-5580
FAX (310) 631-0322

OMAR BRADLEY
Mayor

COUNCIL MEMBERS
RONALD J. GREEN, Dist. 1
MARCINE SHAW, Dist. 2
YVONNE ARCENEAUX, Dist. 3
JANE D. ROBBINS, Dist. 4

HOWARD CALDWELL
City Manager

AMENDED
(New Language in Bold)

April 25, 1995

Duane L. Kenagy, PE and David T. Mazzo, PE
DMJM-MN
One Civic Plaza
Suite 400
Carson, CA 90745

Dear Gentlemen:

I am writing following our meeting on Wednesday, April 5, and the faxes sent April 7 and April 17, to provide an updated list of locations that should be included in the third alternative for the treatment of the Alameda Corridor Rail Project in the Compton Central Business District. Each of the crossings at the locations listed should receive the maximum treatment possible, including the widest covering of the depressed rail way, and appropriate urban design elements and landscaping. **Treatment along the length of the corridor should include a bikeway and equestrian trail.** A proposal should also include a complete cover from Elm Street to Myrrh Street (approximately 3,000 feet) or Palmer Street to Laurel Street (approximately 1,600 feet).

1. El Segundo Boulevard (City Entrance/Gateway)
2. Rosecrans Avenue
3. Elm Street
4. Palmer Street
5. Compton Boulevard
6. Myrrh Street (Also connect existing East and West and eliminate crossing North of Myrrh Street)
6. Alondra Boulevard
7. Greenleaf Boulevard
8. **Auto Drive South**

Thank you for your assistance.

Sincerely,

Reggie Tabor

Reggie Tabor
Special Assistant to the City Manager

Traffic Turning Movement Counts

Project Name: Consolidated Transportation Corridor
Intersection: Alameda Street West & Compton Boulevard
Date: 10-25-90
Day of Week: Thursday
Peak Hour: 16:15 - 17:15

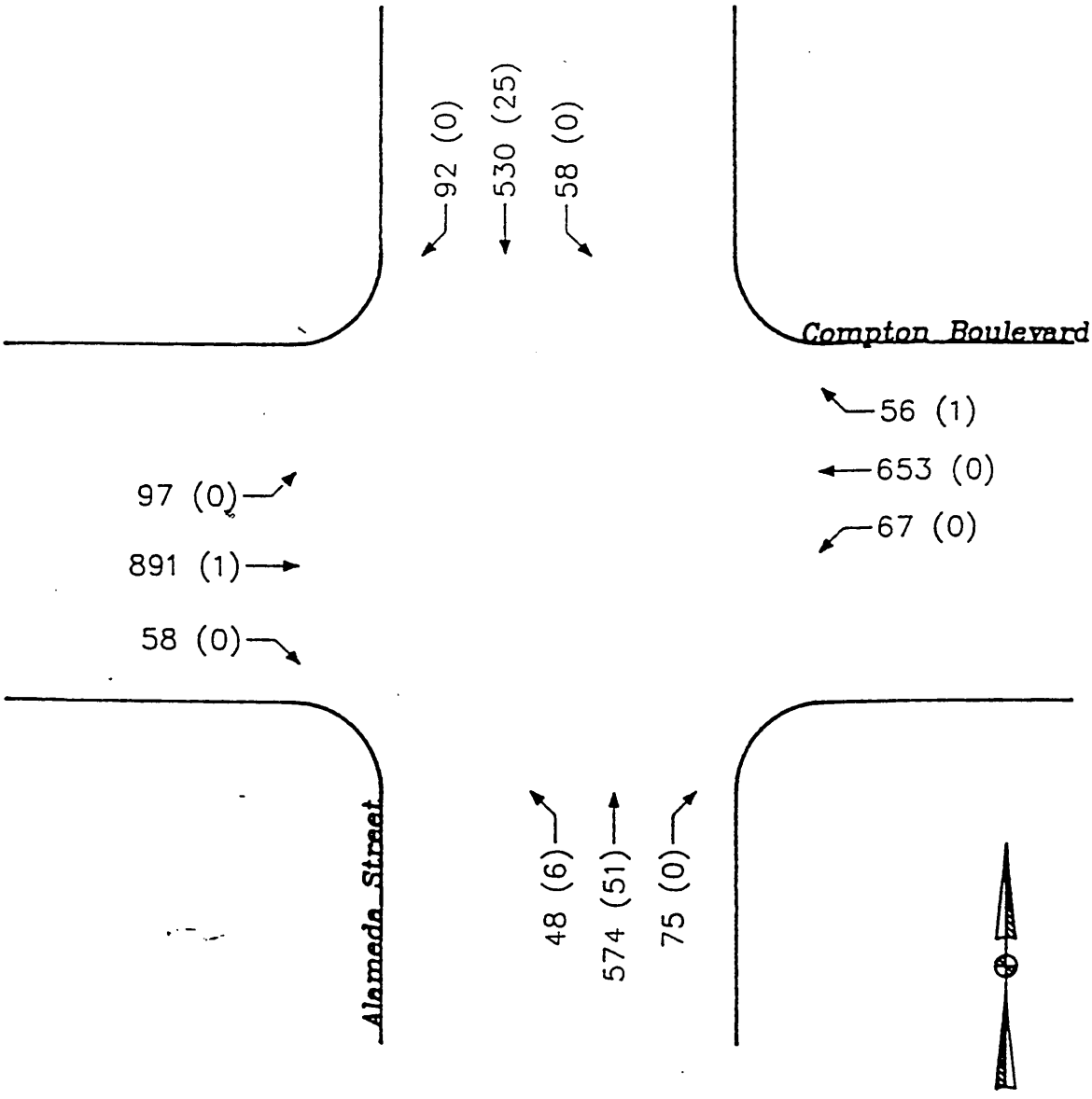


Figure 2.12

Appendix "C"

Traffic Turning Movement Counts

Project Name: Consolidated Transportation Corridor
Intersection: Alameda Street & Alondra Boulevard
Date: 12-13-90
Day of Week: Thursday
Peak Hour: 16:15 - 17:15

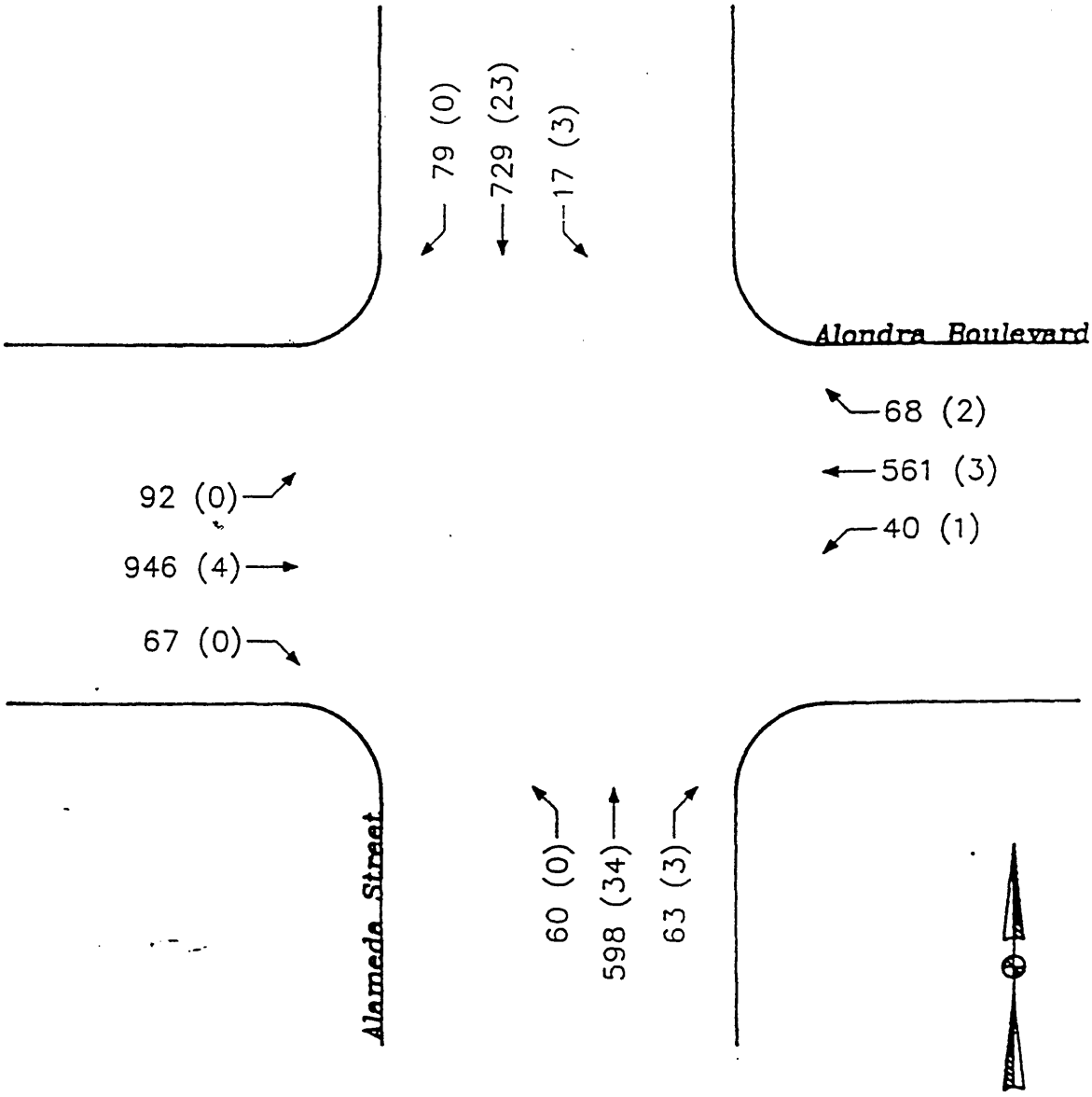
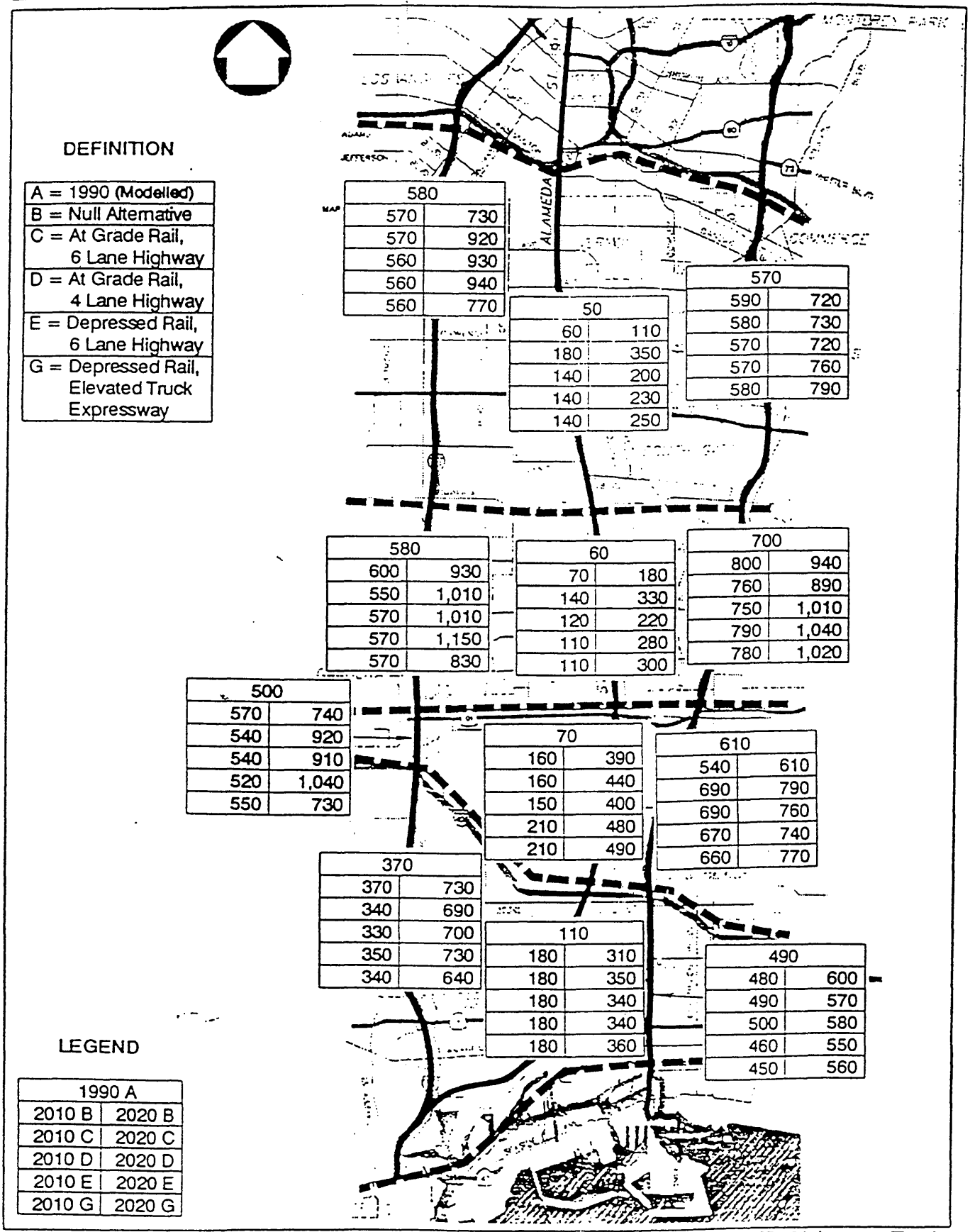
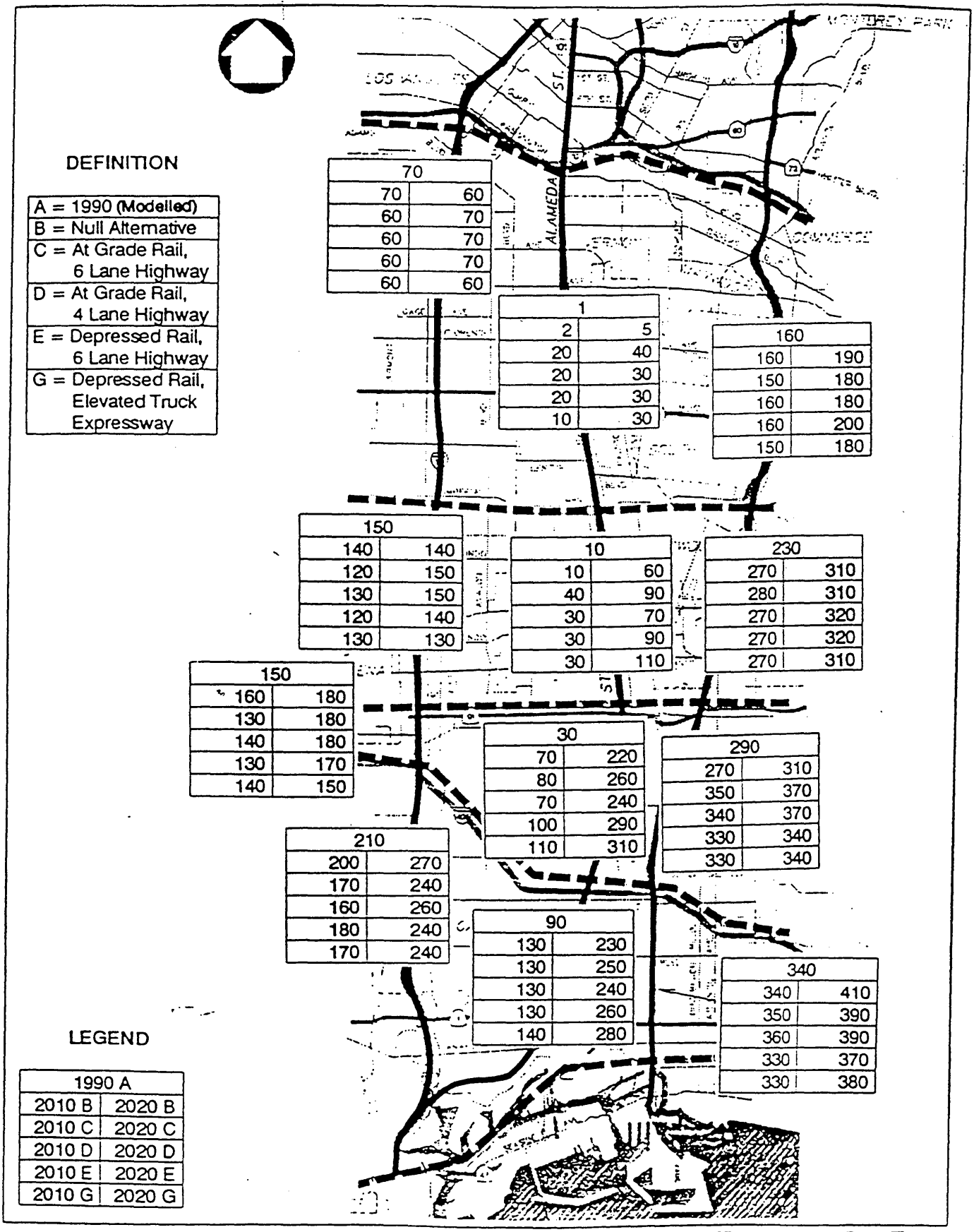


Figure 2.13



Average PM Traffic Volumes - Trucks
Figure 4.16

DKS Associates



Average PM Traffic Volumes - Port Trucks
Figure 4.17

Appendix D

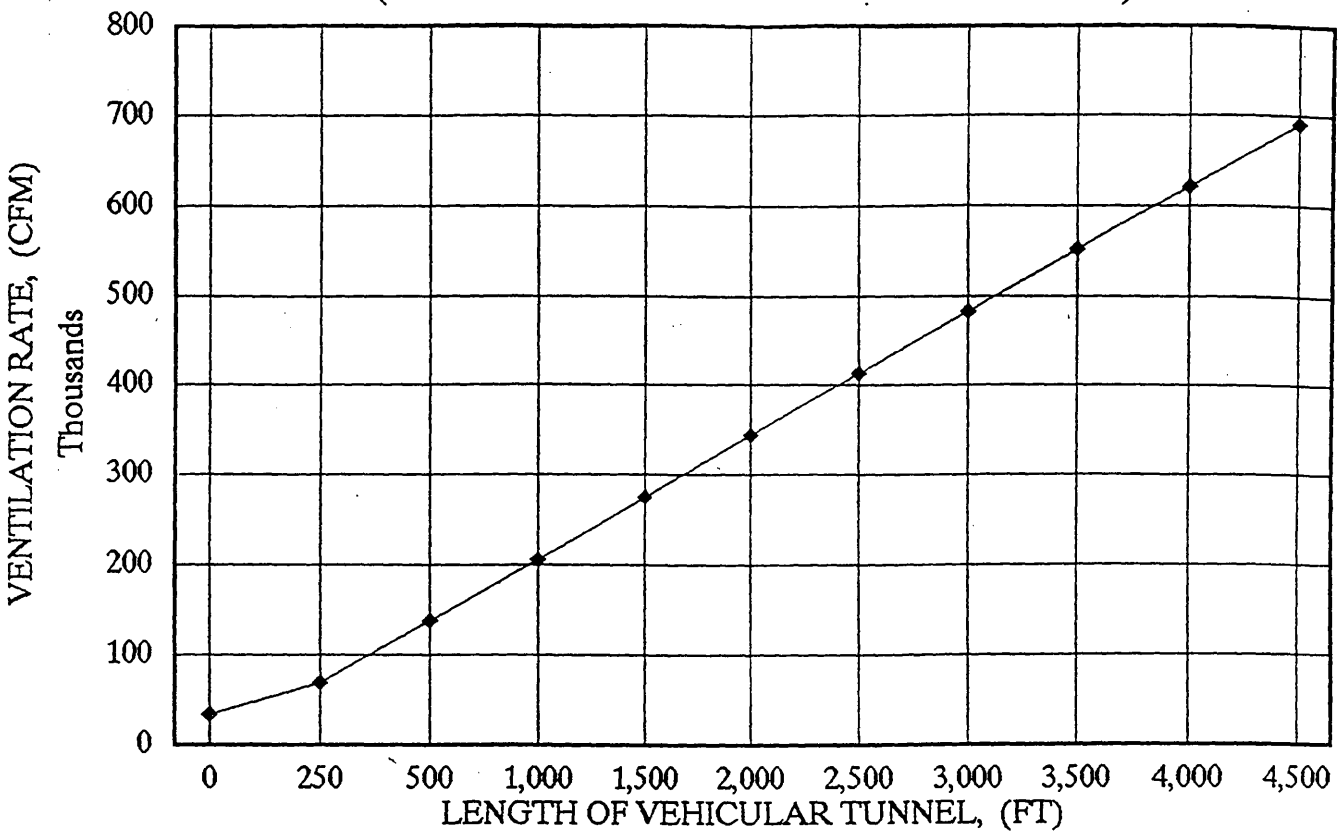
Level-of-Service Definitions

Level of Service	Volume/Capacity Ratio	Interpretation
A	0.00-0.60	Low Volumes; primarily free-flow
B	0.61-0.70	Stable Flow with some restictions
C	0.71-0.80	Stable operations, but ability to move is more restricted
D	0.81-0.90	Approaching unstable flow
E	0.91-1.00	Significant approach delays and substantially reduced speeds
F	Greater than 1.00	Forced flow operations with high approach delays and low speeds

Source: Transportation Research Board, *Transportation Research Circular 212*, January 1980.

Appendix "D"

RECOMMENDED TUNNEL VENTILATION RATES
(U.S. ENVIRONMENTAL PROTECTION AGENCY)



—◆— REQUIRED VENTILATION RATES (WITH EXHAUST EMISSION CONTROL)

SOURCE: EIS GUIDELINES FOR HIGHWAY PROJECTS, 1988

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