



27 March 2009

To: Exposition Light Rail Construction Authority and Metro Transit Authority
Exposition Metro Line Construction Authority
Monica Born, PE, Project Director
707 Wilshire Boulevard, 34th Floor
Los Angeles, CA 90017

phase2@exporail.net

RE: Exposition Light Rail DEIR

Ms. Born,

Attached please find comments from Santa Monicans for Renters' Rights regarding the Draft EIR for the Exposition Light rail Project. As you will see, SMRR strenuously opposes the development of the Maintenance Facility at the site currently owned by Verizon on Exposition in Santa Monica. The facility there would cause severe noise and other burdens on the nearby residential neighborhood especially the community of low and moderate income, ethnically and racially diverse renters who are directly across the street from the Verizon property.

While not mentioned nor considered as an alternative in the Draft EIR, we are likewise opposed to any Expo Maintenance Facility project at the site of the Bergamot Art Center. Bergamot has become an irreplaceable cultural resource for the region and should be preserved.

However, we do believe that publicly owned property adjacent to or near Bergamot (Richlar site, city yards, etc.) may well offer an alternative site, especially for an underground facility. We urge it be evaluated as an alternative.

Patricia Hoffman
Chair
Santa Monicans for Renters' Rights.

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707 Wilshire Boulevard, 34th Floor
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From: Santa Monicans for Renters' Rights

RE: Proposed location of maintenance yard and traction-power substation facility for Expo Light Rail Phase 2

Dear Ms. Born:

Santa Monicans for Renters Rights, an organization devoted to the protection of renters and to ensuring the continued availability of housing affordable to people of diverse incomes, has concerns about the proposed location of a maintenance yard and traction-power substation facility adjacent to residential neighborhoods. SMRR questions whether sufficient weight was given to the unacceptable impacts of a facility of this nature operating 24/7 at the sole location proposed in the DEIR (the Verizon site) -- a location immediately adjacent to a mixed-income neighborhood -- and also questions whether adequate investigation of alternative sites has been conducted.

That this mixed-income neighborhood of multifamily and single-family homes includes some of the largest concentration of low-income, working-class, and minority residents in Santa Monica - - especially in the areas immediately abutting the proposed site for the maintenance yard -- raises serious issues of environmental injustice. SMRR recommends that the greatest priority be given to the criterion that an industrial facility such as this should be located non-adjacent to residential neighborhoods.

There are many intolerable impacts to neighboring communities that a facility of this kind would cause if inappropriately sited -- including noise and vibration, traffic, and pollution, as described in greater detail below.

A. Noise and Vibration

A1. The DEIR admits that the moderate and severe noise impacts caused by the proposed maintenance yard and power substation (TPSS) for several residential units would exceed federal limits. The DEIR suggests that a sound wall and reconfiguration of the power substation might reduce the output of these 24-hour-a-day noise generators so they just barely remain below the threshold set by federal regulations. The DEIR indicates that some residential units might still need to be retrofitted with soundproofing and double-paned glass to meet those federal requirements. This constitutes an intolerable imposition on an established residential neighborhood.

A2. Three eight-hour shifts, with up to seventy workers each, would be entering and exiting the facility by automobile, and the yard would hold as many as 36 light-rail cars at a time. The DEIR explains that the significant noise from high-pressure washing of the

light-rail cars will be essentially continuous. Maintenance operations would proceed day and night. The Expo project representative stated before the Santa Monica City Council that horns, lights, brakes, etc., would be tested and repaired at the site. The traction power substation itself would be expected to add its own cacophony to the constant loud whirring, buzzing, and perhaps tonal noises produced by maintenance operations. These noise nuisances would be most intense, and most resistant to mitigation, at the southern edge of the yard, and thus would interfere with the sleep of the poorest residents of the impacted neighborhood: those who live in the high-density blocks along Exposition Boulevard, where an especially high proportion of the residents are children and seniors - - groups particularly vulnerable to harm by sleep-robbing and nerve-wracking noise.

A3. The DEIR, with its accompanying drawing of the yard, shows numerous tracks with short turning radii, which would seem to indicate -- though this is not mentioned in the DEIR -- that there would be breaks in the tracks ("frogs"), which are known to produce a great deal of noise and vibration as cars move over them. The DEIR is also silent on the question of whether the phenomenon known as "wheel squeal," commonly created as trains negotiate sharply curved track, would occur. Also unaddressed is the matter of the kind of noise and vibration produced when cars are slowed to a stop in the yard. Nor are the types of repair equipment and facilities -- and the noises they emit -- fully specified in the DEIR.

It may reasonably be concluded from the above facts and admissions that the noise would be very loud at most times of the day (if not constantly), including at night and early in the morning. These noise impacts on the neighborhood would adversely affect the quiet and peaceful enjoyment of residential life in the multifamily zone along Exposition Boulevard from Stewart Street to Warwick and also substantial parts of the single-family zone along Delaware Avenue. People throughout the neighborhood -- including seniors, working-class and low-income households, those working out of their homes, and children doing homework -- would lose the quiet and peaceful enjoyment of their homes. They would lose sleep, be unable to concentrate, and suffer reductions in the quality of residential pursuits and enjoyments. In addition,

A4. The location of the maintenance yard is incompatible with the technology-&-entertainment-office-zoned uses immediately adjacent to the east of the proposed site and just north of it on the other side of the tracks. Those uses in general require quiet, but there is a specific need for quiet and also for lack of vibration on the part of sound studios and post-production facilities (which occupy these spaces in accordance with current zoning), to avoid interfering with the sensitive electronic audiovisual instruments they use. These valuable uses would likely be adversely impacted by noise and vibration emanating from such a maintenance yard.

B. Traffic Impacts

B1. The DEIR has not addressed the potential problem of trains on a third set of tracks crossing Stewart slowly going east to enter the proposed site for the maintenance yard, which would block traffic going both ways on Stewart for longer periods of times than would on-duty trains. These crossings would be especially congested during rush hours, when traffic coming from and going to the special-office districts on Olympic and Stewart is heaviest.

B2. College students exiting the SMC shuttle parking lot at Stewart & Exposition are required to turn right onto Stewart north towards Olympic to minimize traffic on

residential streets. This occurs close to the place where the three sets of tracks would cross Stewart and where traffic would be halted for trains. This egress problem -- and the ways it would exacerbate traffic congestion when Stewart's traffic flow is blocked for light rail passage into the yard -- is not addressed in the DEIR.

B3. The DEIR fails to acknowledge traffic impacts caused by employees entering and exiting maintenance yard parking lot, nor does it address the traffic impacts that would be created by equipment and supply deliveries. The DEIR does not indicate the hours when these functions would take place and does not address the detrimental impacts these operations would bring to the adjacent residential community.

C. Hazardous Substances and Pollution

C1. The DEIR does not address whether there would be percolation into soil and/or the water table immediately adjacent to a residential neighborhood by chemicals, heavy metals, degreasers, dirty water from the washing facility, and other hazardous substances. Thus it also fails to consider steps that could be taken to prevent or remedy these dangers. Further, the DEIR does not indicate whether there will be a wastewater treatment plant on the premises, and does not address the question of whether wastewater will enter the sewage system instead of the storm-drain system.

C2. The danger that liquids and particles laden with chemicals, dirt, and/or heavy metals from the wash-&-dry rooms would be carried through the air to the adjacent residential neighborhood is not addressed by the DEIR.

C3. The existing soil and water-table conditions at the site have potential implications for the suitability of the site for a facility of this kind and the impacts on the adjacent residential neighborhood that might ensue, and these issues are not sufficiently addressed by the DEIR.

C4. The employee parking lot for the maintenance yard at the proposed site is located adjacent to Exposition Boulevard, and in addition to the traffic and noise that would be produced by the coming and going of employees and delivery vehicles, there is the potential for significant amounts of hazardous fumes to be generated by the idling of these vehicles during congested hours, especially at the beginning and end of work shifts and during unloading of materials. The DEIR does not address these issues and does not acknowledge the possible adverse impacts on workers in the adjacent technology-&-entertainment-office zone or on individuals, which include large numbers of particularly vulnerable children and seniors, who live in the adjacent residential neighborhood.

These are some of the potential adverse effects of situating an industrial-use facility of this kind adjacent to areas with which it is by nature incompatible. There are valuable, economically productive extant uses of land in the area zoned for technology and entertainment-office use immediately adjacent to the proposed site of the maintenance yard and traction power substation, which would be compromised by the insertion of this inappropriate facility on the proposed site. Moreover, there are many serious adverse impacts posed by the proposed location of the facility on the adjacent densely populated, mixed-income residential neighborhood that includes multifamily and single-family areas in which reside a large number of working-class and low- and moderate-income households, a neighborhood that has already suffered severe adverse impacts with the intrusion of the freeway, which tore a gash through its heart and imposes its

own heavy burden of noise, traffic, airborne and other pollution, and physical isolation from the surrounding community.

The DEIR is deficient in its failure to indicate that alternative locations were given sufficient study. During his appearance before the Santa Monica City Council, the representative from the Exposition Light Rail Authority said he had a list of possible sites that had been identified and considered. He failed to present the justification for choosing the proposed site except for the somewhat circular statement that it was the one that had been focused on. Yet there appear to be nonresidential areas along the line that might be more suitable, but they were not given due and sufficient consideration and study.

For example, during the February 9th, 2009, meeting of the Santa Monica City Council, Mayor Ken Genser suggested as one possible alternative the concrete-processing area along the right-of-way just west of the 405 Freeway. Councilmember Kevin McKeown cited another large block along the right-of-way just beneath and then east of the 405, bounded by Sawtelle, Pico, Sepulveda, and Exposition Boulevards. And there is a site near where the I-10 meets Robertson Boulevard that seems potentially suitable.

D. Questions that remain to be answered

Given the totally inappropriate noise levels and other impacts a maintenance yard/traction-power substation facility would cause for the existing low- to moderate-income, ethnically diverse residential neighborhood immediately to its south, and to the noise-sensitive business district immediately north and east of the Verizon site:

D1. Has the agency explored the possibility of acquiring an alternative maintenance yard site since property values have declined and property owners are finding it hard to raise capital for development projects? If not, please study the possibilities, and in either case detail the findings. The chief representative of the agency in Santa Monica told inquiring persons that the cost of land and/or the existence of private development proposals for alternative sites were the main reasons for the focus on the resident-adjacent Verizon site. Given both that the agency now has funding approved by the voters, and that it will save about \$50 million if the line travels along the Colorado Avenue path instead of the Olympic route, why could the Exposition Authority not seek and secure a more appropriate location for the maintenance yard?

D2. Has the agency explored purchasing a site for a smaller maintenance yard and storing vehicles on a side track along the right-of-way until a more appropriate site (i.e., one not adjacent to a residential neighborhood) can be acquired? If not, please explore the possibilities, and in either case detail findings.

D3. Has the agency explored cleaning and maintaining Expo light-rail cars at the proposed new, large maintenance yard at Union Station, and then storing Expo cars on side tracks along the Exposition right-of-way until another more appropriate site (or sites) can be acquired for Expo Phase 1 and 2 storage and/or maintenance? If not, please study the possibilities, and in either case detail findings.

D4. Has the agency explored creative use of two or more lots to perform maintenance yard and traction-power substation functions in order to avoid seriously damaging the quality of life in the low- and moderate-income residential neighborhood adjacent to the Verizon site? If not, please study the possibilities, and in either case detail findings.

In conclusion, the sole site proposed and studied for the Expo Phase 2 maintenance yard and traction-power substation is inappropriate, and other alternatives did not receive sufficient study and consideration. The detrimental effects on an already burdened established mixed-income neighborhood are intolerable and unjust, as detailed above. For all these reasons and more, Santa Monica's for Renters' Rights recommends that the Exposition Light Rail Authority and Metro Transit Authority place the highest priority in selecting the site for the maintenance yard and traction-power substation on respecting the criterion that an industrial facility be sited non-adjacent to a residential neighborhood.

Patricia Hoffman
Chair
Santa Monica's for Renters' Rights