



**PALMS RECREATION CENTER  
PARK ADVISORY BOARD**  
City of Los Angeles Department of Recreation and Parks  
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March 10, 2009

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Exposition Metro Line Construction Authority  
Attn: Monica Born, PE, Project Director  
707 Wilshire Boulevard, 34<sup>th</sup> Floor  
Los Angeles, CA 90017

Re: EXPOSITION CORRIDOR TRANSIT PROJECT PHASE II  
DRAFT ENVIRONMENTAL IMPACT REPORT COMMENTS  
(State Clearinghouse No. 2007021109)

To Whom It May Concern at Exposition Metro Line Construction Authority:

On behalf of the Palms Recreation Center Park Advisory Board for the City of Los Angeles Department of Recreation and Parks, we appreciate this opportunity to provide comments in response to the Exposition Phase 2 DEIR.

**PALMS PARK AND RECREATION CENTER, PALMS DAY CARE, AND  
PALMS-RANCHO PARK LIBRARY**

The Palms Park and Recreation Center is located at 2950 Overland Avenue Los Angeles, CA 90064 and adjacent are Palms Day Care Center at 2930 Overland Avenue and the Palms-Rancho Park Library. The recreation center provides indoor and outdoor sports and recreation facilities such as t-ball, soccer league, youth basketball, sports camp, 5-pitch, outdoor lighted basketball courts, children's outdoor playground and picnic area. The facility provides a variety of social activities and classes for adults as well in their community rooms and auditorium. 50 children are enrolled in the Palms Child Care program, which is open from 9am to 7pm Monday through Friday. Over the course of the year, and during the summer as well, there are 20 or more Overland Avenue School children enrolled in the after school program who walk with Park employees from Overland School at 2:30 each day down Overland Avenue from Ashby Avenue to the recreation center just south of Coventry Place where they stay as late as 7 p.m., Monday through Friday.

This migration also occurs during vacation months as well as summer vacation to and from the school and from children's homes in the area. The Palms Park and Recreation Center is well-known for its summer programs and camp where children from the ages of 3 to 14 spend the course of their day, five days a week in numerous activities throughout the Park's grounds, including, but not limited to areas directly adjacent to where Expo's proposed Light Rail transportation line is being placed. The Park's summer program has been a windfall for the community, giving the community's children a place to explore, learn and stretch their mind's and bodies while being safe, out of harm's way and off the already busy streets of our community. Our summer

programs have been consistently overenrolled since the 1970's and provide services to more than 200 children with 30 full and part-time staff and counselors each day.

The Palms –Rancho Park Library is located at 2920 Overland Avenue immediately adjacent to the Palms Park Recreation complex and shares a common driveway and on site parking facilities with the complex. Library hours vary daily from 10:00 a.m. to 8:00 p.m. and is closed on Sunday.

Though the Palms Park Recreation complex and Library are identified on the Publicly Owned Parks and Recreation Resources map (DEIR, Figure 3.14- and the Community Facilities Map (DEIR, Figure 3.14-2) no impacts appear to have been studied or identified.

### **LOSS OF PARKING AND CONGESTION**

On site parking for the Palms Park complex and Library is often filled to capacity throughout the day and into the evening 7 days a week. Community meetings and special events in the park and library community rooms brings groups as large as 100 which use the parking lots. Frequent sporting events, cultural events, and school and camp programs bring large groups to the site as well, at times with groups as large as 300 which also use the parking lots. Park staff from the multiple facilities also use the on site spots. Overflow parking from the businesses nearby regularly take additional spots. Because of freeway proximity there is limited street parking immediately in front of the park facilities. The street parking on the eastside of Overland is the only remaining option when the lots are full. Removing the parking on the east side of Overland Avenue from Northvale Road to Coventry Place would adversely impact access and use of the Park and Library facilities. The impact of the parking removal needs to be studied and replacement parking identified.

### **PEDESTRIAN SAFETY, TRAFFIC IMPACTS, AIR QUALITY AND NOISE IMPACTS**

The street level (at-grade) train crossing currently planned for Overland Avenue at Northvale Road/ Exposition will create substantial risk to the students walking each day from Overland School to the Palms Park Recreation Center. The students' route follows an LADOT identified Safe Route to School (DEIR, Table 3.2-39). The introduction of 3-coupled, 250 ton double train cars, passing every 2 ½ to 5 minutes and blocking traffic from 42 to 85 seconds, 24 times per hour, at street level will create severe adverse impacts to the Overland students walking on Overland Avenue School to classes and after school day care at Palms Park.

The Expo DEIR has not identified or studied the safety impacts of the construction, testing or operation of the train project on the children walking after school to Palm Park, Palms Day Care or Palm/Rancho Park Library. The generic pedestrian gates may not be sufficient to prevent children from crossing under. Signage and LED lighting appropriate for adults may not be readily visible to small children, especially since the Palms Child Care participants cross in mid-afternoon when sunlight may distort or obscure the warning lights. The offer of student train safety education lacks specificity. What funding source for this education has been identified and what evaluation or testing method would be used to determine whether the program is being implemented correctly? Who would administer the program? When viewing the

ineffectiveness of such age specific programs as the D.A.R.E. program and abstinence—only education programs, how will the MTA education be more effective? Expo needs to study the safety hazards resulting from the at-grade crossing and devise real mitigation for real impacts identified.

The Phase 2 DEIR proposes to add two additional traffic lanes to Overland Avenue between Cushdon Avenue and Coventry Place. The adverse air quality impacts of increased traffic on the children walking to Palms Child Care Center should be studied and mitigation devised if impacts are identified. The proposed removal of parking and parkway reduction width on the east side of Overland will move traffic closer to pedestrians and diminish the safety margin separating cars from kids on the LADOT Safe Route to School and bring them closer to tailpipe emissions. The air quality impacts of increased and lengthy queuing of cars at the rail blocked intersection of Overland and Northvale/Ashby should be studied and mitigation devised if adverse impacts are identified.

The DEIR lists ambient noise levels near the walking route to be less than 60 Ldn (dBA) long-term (DEIR, Table 3.12-1), 67 Ldn (dBA) short term (DEIR, Table 3.12-2). The noise level of a light rail horn is listed at 85 dBA at 100 feet. The pedestrian storage area is within 10 feet of the light rail passing with the train horn, gate bells, and propulsion noise as the train passes within feet at up to 35 miles per hour. Adverse noise impacts on the hearing of students standing in the pedestrian areas of the intersection waiting to cross should be studied and mitigated if impacts are identified. Wheel Squeal on the curve along Northvale from Haddington to Dunleer Drive is likely to produce severe noise impacts even though the train is in a trench as it passes the park. The propulsion noise would most likely be mitigated sufficiently by the depth of the trench, the potential wheel squeal on that curve, however, should be studied. The park recently has finished plans and is seeking funding for substantial park improvements including leveling the sports field, building an outdoor sports complex and potentially adding an outdoor amphitheater. Intrusive wheel squeal would constitute a severe impact to such facilities.

### **CUMULATIVE IMPACTS - PALMS PARK AND RECREATION CENTER ISSUES WITH LIGHT RAIL**

An elevated crossing for Expo Phase 2 at Overland Avenue and Northvale/Exposition might mitigate some of the adverse impacts of the proposed Expo project, but would create additional impacts to the community, our children and our Park that cannot be mitigated.

**An underground crossing for Expo Phase 2 at Overland Avenue and Northvale/Exposition would eliminate the impacts caused by additional traffic and diminished air quality resulting from that traffic. Additionally, the noise impacts to the pedestrians at the intersection would be significantly reduced. If the crossing were underground there would be no necessity to add two traffic lanes between Cushdon Avenue and Coventry Place, nor to remove parking or reduce the parkway width.**

Additionally, the continuation of an underground thoroughway for the Light Rail, running along side Northvale/Exposition from a tunnel under the I-10 Freeway near Overland Avenue Freeway Exit and continuing across Overland Avenue as an underground crossing next to Overland

Avenue Elementary School would eliminate the additional impacts caused by an open trench-like above ground, at-grade, Light Rail safety hazard for the children and families traveling by foot along that route on a daily basis. It is important to note that the backside of our Park, which is used for ALL our children's sports activities and summer camp activities is directly situated and buttressed up against the edge of that manmade ravine which the at-grade Light Rail would use. All that comes between our Park's children and their safety under the Exposition Metro Line Construction Authority's above ground, at-grade Light Rail is a chain link fence and a deep ravine. This planned approach is a clear and present danger to our children in the Park as well as those walking to and from the Park along Northvale/Exposition Avenues. In some circles, it would be called an "attractive nuisance". To put it in clearer terms, do you know how many baseballs, soccer balls and other types of balls/objects find their way everyday from our Palms Park field into the ravine which Expo will use for its planned open-air, above ground, at-grade Throughway for their Light Rail? It is imperative that children not find their way anywhere near that ravine and that Light Rail.

It is clear to our Board that an impact study needs to proceed with haste as to the feasibility of an Underground Throughway and Underground Crossing in the Palms/Overland areas as defined in this letter. We also strongly believe that more usable park space is needed to mitigate many of the impacts of this Light Rail project in our Park's service community. By placing the Light Rail Underground along its route as well as at crossings, the Exposition Metro Line Construction Authority creates new opportunities for the community and the Department of Parks and Recreation AT-GRADE by creating MORE usable park space and "green" mall space. In a city and community where more and more of our parks and community "lifestyle" spaces are beginning encroached upon, this "underground" choice for our community would create more of what our city needs most to serve our citizenry in the way of clean, clear, open, green, environmentally-friendly, health and athletically-oriented spaces. This alternative and its impacts need to be studied by the Exposition Metro Line Construction Authority forthwith.

In conclusion, it is evident to our Board that Underground Throughways for Expo Phase 2 and, in particular, an Underground Crossing at Overland Avenue should be studied thoroughly for the sake of our children and our community, and we should expeditiously move forward with full transparency in that study including stakeholders such as our Park, our Library, our Child Care Center, our neighborhood Public Elementary School and the homeowners/renters who live in the impacted area.

### **CUMULATIVE IMPACTS - OVERLAND AVENUE BRIDGE WIDENING ISSUES**

The Overland Avenue Bridge (Bridge No. 53-1616), located over the I-10 Freeway between National Boulevard and National Place, is proposed to be widened adding a northbound lane to the existing lanes. The Overland Avenue Bridge is scheduled to be widened over a period of 18 months beginning in July 2009 with completion expected in December 2010. Although the construction is not anticipated to overlap with the proposed construction start time and duration (scheduled from 2011 to 2015) for the EXPO ROW in the proposed EXPO Phase 2 Light Rail Project, it is not uncommon for roadway, bridge, and freeway improvement projects to not complete construction within the anticipated construction timeline. Construction timelines are

frequently delayed because of unanticipated job site conditions including complications arising from replacing or re-routing existing infrastructure (storm drains, sewer lines, water lines, etc.), weather conditions, and lack of availability of construction materials. Therefore, if the EXPO Phase 2 Transit Project Light Rail Alternatives 1 or 2 should be implemented, mitigation measures should be added to prohibit work on Overland Avenue and Westwood Boulevard along the EXPO ROW until the Overland Avenue Bridge Widening is completed.

The Overland Avenue Bridge is only mentioned in the “No-Build” Alternative in the Phase 2 DEIR and does not appear to be studied. Furthermore, the DEIR did not study potential impacts of simultaneous construction of the Overland Avenue Bridge and the proposed EXPO Phase 2 Light Rail Project along the EXPO ROW, nor did it study the proposed changes in traffic flow and air quality impacts both during construction and during operation of both projects. Concurrent construction would cause greater cumulative impacts to the Park and Community Facility Resources of Palms Park Recreation Center, Palms Day Care Center, Palms-Rancho Park Library, Notre Dame Academy and the surrounding residential neighborhoods. Likely adverse impacts during construction are traffic lane restrictions, parking removal, additional vehicle queuing, delay accessing the I-10 Freeway, blocked access to the community facilities, noise and increased cut-through traffic in adjacent neighborhoods. In the event of a cumulative construction period these impacts should be studied and suitable mitigation devised. LRT Alternatives 1 and 2 must include a comprehensive study of all potential impacts of the construction and operation of the Overland Avenue Bridge Widening project in conjunction with LRT Alternatives 1 and 2 and any additional alternatives that may be added to the DEIR and studied that run along the EXPO ROW alignment.


The Los Angeles Department of Transportation (LADOT) has stated in public documents that the purpose of the Overland Avenue Bridge Widening project is to facilitate more cars traveling northbound on Overland Avenue from areas south, the I-10 Freeway, and the I-405 Freeway. Additional capacity creates additional traffic. Higher per lane traffic counts may change the at-grade determination of the **Metro Grade Crossing Policy** on the crossing proposed for Expo trains at Northvale Road/Exposition resulting in a grade separation determination. The DEIR discussion and analysis should take into account that by widening the Overland Avenue Bridge by one northbound lane, Overland Avenue traffic flow will increase in the vicinity of the bridge. Increased traffic flow on an arterial corridor results in commuters migrating to the road that has been widened when the parallel arterial corridors are highly congested. Therefore, since Westwood and Sepulveda Boulevards are highly congested and operate at an unacceptable level of service now (both operate at LOS F in the PM Peak Period), it can be anticipated that traffic volumes on Overland Avenue will increase over time as commuters increase their usage of Overland as a north/south arterial corridor. Even if the two projects do not overlap in time Expo must account for the impacts of the increased traffic volume of the completed Overland Widening Project in the Expo Phase 2 environmental study. The disruptive impacts on the egress, ingress, access and parking need to be studied and mitigation devised for any adverse impacts. Because of the numbers of children using the Palms Park facilities changes in access to the service areas by emergency service providers such as fire and police should be studied.

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If the projects do overlap then all cumulative impacts of the simultaneous construction and traffic impacts on the use of the facilities by students, children and the general public at the Palms Park community complex need to be studied by Expo.

Thank you for your careful attention and complete responses to the important issues and concerns raised herein. We look forward to working with you to arrive at satisfactory mitigation with real solutions resulting in a better, safer, community-friendly transportation system that best serves our community and, in particular, our children.

Sincerely,



Lawrence N. Daniels

Board Member

On behalf of Palms Park Advisory Board

cc: John Kirk Mukri, General Manager- City of Los Angeles Dept. of Recreation and Parks  
Maggie Johnson Head Librarian-Palms-Rancho Park Library  
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