UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX
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OCT 21 2014

Raymond Sukys
Director, Office of Planning and Program Development
Federal Transit Administration, Region 9
201 Mission Street, Suite 1650
San Francisco, California 94105-1839

Subject: Draft Environmental Impact Statement for the Proposed Eastside Transit Corridor Phase 2 Project, Los Angeles County, California [CEQ #20140239]

Dear Mr. Sukys:

The U.S. Environmental Protection Agency (EPA) has reviewed the Draft Environmental Impact Statement (DEIS) for the Eastside Transit Corridor Phase 2 Project, a proposed light rail line extending service eastward to either the City of South El Monte or the City of Whittier, California. EPA is a "Participating Agency" (as defined in 23 U.S.C. 139) and a "Cooperating Agency" (as defined in the Council on Environmental Quality's NEPA Implementing Regulations). Our comments are provided pursuant to the National Environmental Policy Act (NEPA), Council on Environmental Quality regulations, and Section 309 of the Clean Air Act.

In addition to our role in providing comments through the NEPA process, EPA also has an independent regulatory role with respect to a portion of the State Route 60 Alternative (SR-60 Alternative). Since the mid-1980's, EPA has been undertaking response and cleanup actions at the Operating Industries, Inc. Superfund Site (OII Site) in Monterey Park pursuant to the Comprehensive Environmental Response Compensation, and Liability Act of 1980, as amended, 42 U.S.C. Section 9601 et seq. Over the past almost thirty years, significant threats to human health and the environment have been addressed at the OII Site using a wide-range of cleanup methods to address landfill slope stability, methane gas fire/explosion risks, control of contaminated liquids/leachate inside the landfill and contaminated groundwater beneath the landfill. Past and future cleanup costs will be approximately $600 million. The Region 9 Superfund Division has assisted in developing the comments attached to this letter. Importantly, in addition to the NEPA process, any third party design and construction activities at the OII Site would require EPA Superfund review and approval to ensure that such activities do not interfere with ongoing cleanup measures and that no new threats to human health and the environment are created by the construction and operation of a light rail line through the OII Site.

EPA strongly supports the development of public transit projects, as well as the productive reuse of remediated sites, so long as such reuse can be accomplished in a manner protective of human health and the environment. Further, EPA has experience successfully working to mitigate the impacts of construction of a rail system project at a landfill in another region of the country. Transit projects are

particularly important in the project area, given the congested traffic conditions in Los Angeles, and some of the worst air pollution in the country. In addition to serving a large number of transit-dependent and low-income populations in the study area, the proposed project could improve air quality by providing a convenient and reliable alternative to the automobile. Because Federal Transit Administration and Los Angeles Country Metropolitan Transportation Authority have not yet identified a preferred alternative, EPA's comments address and rate each Alternative proposed in the DEIS.

State Route 60 Alternative

The location for the SR-60 Alternative introduces a high degree of complexity and heightened engineering challenges since construction and operation of a light rail facility will directly impact the OII Superfund Site. While EPA acknowledges the benefits of transit to the region, as well as the desirability of making productive use of a remediated site, the DEIS does not contain sufficient analysis to address the uncertainties and potential risks to human health and the environment that may result from construction and operation of a new light rail through or near the OII Site. EPA believes that, prior to the project moving forward, it is essential that additional safety-related studies are undertaken to address these uncertainties and to ensure public disclosure, and informed decision-making related to: 1) landslides, 2) seismic risks, 3) fill integrity, 4) hazardous waste releases, and 5) impacts to groundwater contamination control where the SR-60 Alternative affects the OII Site. Due to the magnitude of the uncertainties remaining and given the possible impacts to health and the environment that will require further project design commitments to reduce impacts, EPA has rated the SR-60 Alternative, as "*Environmental Objections – Insufficient Information*, (EO-2)". The enclosed "Summary of EPA Ratings Definitions" further describes the ratings. EPA's authorities under CERCLA (the Comprehensive Environmental Response, Compensation, and Liability Act) allow EPA to take action to prevent interference with or the compromise of any remedial actions taken under the Superfund program. EPA further notes that, given the rather lengthy period until project construction is likely to begin (estimated as 2027-2032), it is very likely that supplemental NEPA work will be necessary prior to undertaking this project due to changes in circumstances and the surrounding environment.

North Side Design Variation of the State Route 60 Alternative

Given the heightened uncertainties and possible environmental risks of the SR-60 Alternative, EPA supports continued refinements to a variation of the alignment, the "North Side Design Variation SR-60 LRT Alternative", which offers an opportunity to meet the project purpose and need with lower potential risks to health and the environment than is anticipated from the "baseline SR-60 Alternative". The North Side Design Variation would traverse the OII Site on the north side of SR-60, rather than siting a future light rail directly adjacent to, and at the toe of, the steep slope of the South Parcel of the OII Site. However, the North Side Design Variation also requires critical analysis and design commitments to ensure public health and safety, as well as integrity of the OII Site remedial actions.

Washington Boulevard Alternative

EPA has separately rated the Washington Boulevard Alternative as "*Environmental Concerns – Insufficient Information*, (EC-2)" based on concerns related to contamination in soil, soil vapor and groundwater investigation associated with a separate Superfund Site, the Omega Chemical Superfund Site.

Transportation System Management Alternative

EPA has separately rated the Transportation System Management (TSM) Alternative as "*Lack of Objections*, (LO)" and has no additional recommendations for this Alternative. Should FTA/Metro choose to construct either of the two "build alternatives", the SR-60 or the Washington Boulevard Alternative, EPA supports commitments to adopt integration of TSM elements as feasible.

The enclosed detailed comments further describe the issues discussed above. Thank you for the opportunity to comment on the DEIS. We look forward to continued conversations to ensure the benefits of the proposed transit project are considered in the context of impacts to public health and safety associated with potential disturbance at the OII Superfund Site, and with appropriate mitigation commitments. To further discuss EPA's comments and to discuss a strategy for resolution of the issues identified, please contact Connell Dunning, the Transportation Team Supervisor for transportation projects in Region 9 (415-947-4161 or dunning.connell@epa.gov).

Sincerely,

Lisa B. Hanf, Assistant Director
Enforcement Division

Enclosures: Summary of EPA Rating Definitions
EPA's Detailed Comments on the Eastside Transit Corridor DEIS

cc: Ray Tellis, Federal Transit Administration
Mary Nguyen, Federal Transit Administration
Laura Cornejo, Los Angeles County Metropolitan Transportation Authority

SUMMARY OF EPA RATING DEFINITIONS*

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

ENVIRONMENTAL IMPACT OF THE ACTION

"LO" (Lack of Objections)

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

"EC" (Environmental Concerns)

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

"EO" (Environmental Objections)

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

"EU" (Environmentally Unsatisfactory)

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

ADEQUACY OF THE IMPACT STATEMENT

"Category 1" (Adequate)

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

"Category 2" (Insufficient Information)

The draft EIS does not contain sufficient information for EPA to fully assess environmental impacts that should be avoided in order to fully protect the environment, or the EPA reviewer has identified new reasonably available alternatives that are within the spectrum of alternatives analysed 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 analysed in the draft EIS, which should be analysed 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.

SR-60 Alternative

The Federal Transit Administration and Los Angeles County Metropolitan Transportation Authority propose to extend the existing Eastside Light Rail to the east, along State Route 60 (SR-60 Alternative) or along Washington Boulevard (Washington Boulevard Alternative). The SR-60 Alternative would extend a light rail track through the Operating Industries, Inc. Superfund Site (OII Site), which will still be undergoing active remediation through the project's forecast construction phase in the years 2027-2035. Compromising the integrity of remediation activities through new construction and operation of the project may pose a significant and avoidable risk to human health and the environment, which should be fully evaluated and disclosed in the National Environmental Policy Act process. However, we understand that FTA/Metro intend to prepare this analysis in the future once a locally preferred alternative has been identified. The DEIS therefore defers critical analysis and does not sufficiently describe and evaluate landslide risk, seismic stability, fill integrity, and possible waste release and groundwater contamination associated with the SR-60 Alternative as it passes through the OII Site. This information is critical for decision-making.

Specifically, the greatest uncertainties and risks are associated with the "Baseline SR-60 Alternative" alignment where it is directly adjacent to, and at the toe of the steep slope of, the South Parcel of the OII Site. The DEIS also includes an insufficient analysis of a northern variation of this alignment, the "North Side Variation SR-60 Alternative", which would cross the OII Site to the north of SR-60 in a location preferable to crossing the Site along the steep slope of the South Parcel, so long as the risks to human health and safety are sufficiently analyzed and addressed prior to a NEPA determination on the project.

The recommendations to address the uncertainties and risks highlighted by EPA below were also included in our August 30, 2012 letter to FTA/Metro following our review of an Administrative Draft of the DEIS. FTA/Metro prepared a Technical Memorandum on July 31, 2013 (included as DEIS Attachment 1 to Appendix V) to address EPA's Administrative Draft comments and recommendations. We appreciate that the DEIS provides considerable detail (particularly in Section 4.11) on proposed mitigation measures intended to address uncertainty and risk related to potential hazards during construction and operation of the project. However, a greater extent and scope of design commitments, along with a more robust analysis and understanding of the existing subsurface conditions along the proposed route, are necessary given the complexity of constructing a light rail through the OII Site. The analysis provided in the DEIS and Appendix V does not fully address significant uncertainties and risks in the vicinity of the OII Site, and the potential impacts these could have on construction and operation of the proposed project, and associated slope stability at the OII Site.

Landslide Risks

The DEIS identifies three ancient landslides and states that these natural landslides do not appear to be a hazard because of the extensive grading activities which took place in the area (Pages 4.11-19). Additional supporting documentation is needed to conclude that these landslides no longer exist or will not impact the OII Site facilities as a result of the proposed light rail construction. As noted by FTA/Metro in documents provided in Appendix V, Attachment 1, and Appendix A, there may be more landslides present along the northern boundary of the Southern Parcel of the OII Site than the three landslides discussed in the DEIS. For example, on page A.2.12, Section 5 of the Memorandum Report by Environmental Solutions Inc. (1996), it is stated "...there exists numerous surface failures

(landslides) along a ridge trending along the north boundary of the South Parcel of the site..." In addition, a similar statement was made on page B.2.1-3 (Letter Report by Cluff and Brogan (1996)), which stated that "Other landslide-related features were observed elsewhere in the hills of the site vicinity". The DEIS should analyze and disclose the potential for additional landslides, as well as project commitments to ensure possible landslides will not harm human health and the environment with the construction and operation of a light rail.

Recommendations:
Consistent with the FTA/Metro characterizations in the DEIS (Pages 4.11-24 and 4.11-30; Page 12, Appendix V), EPA reaffirms the need for, and recommends additional evaluation of, ancient landslides, prior to selection of an alternative that includes construction and operation of the light rail along the SR-60 alignment.

To determine if additional slides are a potential hazard and would be affected by a proposed light rail alignment, EPA recommends that FTA/Metro develop geological maps and cross-sections showing the limits of the existing landslides on the project site, based on site-specific empirical data (subsurface exploration and site mapping) as well as previously published documents.

Characterize the geotechnical properties and extent of the ancient landslides, and analyze potential slope stability hazards relative to the proposed light rail alignment and OII Site slopes. Include areal limits (plan view) of the existing landslides with respect to the current topography and planned improvements with the cross sections presented in Appendix V, Attachment 1.

Evaluate whether new fill and retaining walls along with changes in drainage patterns (especially with the North Side Design Variation), could reactivate the landslides, and, if so, how these changes could potentially impact the SR-60 Alternative and/or OII Site facilities.

In several instances, the DEIS states that the landslides have been removed, truncated, or buried. In addition to potential slope stability concerns, landslide debris typically is composed of disturbed material that is highly fractured and sheared, with mixed non-homogeneous soil and/or rock debris that can have unpredictable zones of loose and weak material.

Recommendations:
Evaluate and disclose the engineering properties and the environmental impacts of the construction associated with the alignment and describe design features necessary to insure viability and human safety, especially for light rail pile foundations. For example, Figures SP-2 and SP-3 (Appendix V, C.1 - Attachment 1) show the light rail pile foundations embedded in what appears to be landslide debris. Address potential settlement of the slide material due to the light rail loads and the impact to overall stability of the adjacent slopes underlain by slide material. Provide commitments for design features to address these issues.

Section A-A' in Figure A.2.16 (Appendix V, Attachment 1) of the DEIS shows a landslide below and north of SR-60, west of Greenwood Avenue. This section indicates that alluvium is covering the toe of the slide and perhaps acts as a buttress for the slide. However, there is no subsurface data provided in the immediate toe area of the slide to support this interpretation, and no slope stability analyses has been provided. Section A-A' is a single section in an area where landslides exists in the vicinity of the SR-60 Alternative.

Recommendations:
Conduct detailed site-specific geotechnical analyses necessary to evaluate the conclusion that alluvium acts as a buttress for the landslide area north of SR-60 and West of Greenwood Avenue. If the slope stability analysis indicates additional supporting structures are needed, clarify this as a part of the proposed SR-60 Alternative.

Integrity of Fill Material
Appendix V, Page 16, states that as much as 40 feet of fill was placed west of Greenwood Avenue (as part of the SR-60 construction) buttressing the slope to the south. However, as shown on the existing SR-60 drawings (Appendix V, A.3-Attachment 1) hardly any fill was placed and even minor cuts were made just west of Greenwood, which is within the area of a mapped landslide, and does not provide a buttress.

Recommendations:
Identify and evaluate the limits of the fill geometry, especially in the area north of SR-60 and west of Greenwood Avenue. Conduct a thorough review of the 1996 Environmental Solutions report for which many of the conclusions in Appendix V, Attachment 1 are based and review any available grading reports for the fill in the area. Additionally, conduct site-specific studies of geotechnical data to confirm the adequacy and integrity of the fill as a foundation for construction of a light rail alignment and to confirm the slope stability statements included throughout the DEIS.

Determine if the landslide was removed as part of the grading in this area or if the fill was placed on top of the landslide. Include documentation to confirm adequate buttressing, with the fill having to be keyed into "competent" material in front of the landslide or other previously implemented mitigation measures for adequate buttressing.

Seismic Risk
Appendix V, Page 32, states that "slope stability concerns for the adjacent SR-60 and the landfill are presumed to have already been addressed as part of the landfill closure and original freeway construction activities to minimize such hazard". However, site-specific evaluations are required for the land within the seismic hazard zones that are included in the footprint of the proposed light rail alignment. It is especially critical to confirm current seismic risks prior to construction, since additional seismic information may have become available since the roadway construction was completed over 50 year ago.

Recommendations:
As required in the State of California's designated Seismic Hazard Zones, include site-specific analyses of the potential seismic hazards associated with the project. Further, include actual landslide limits rather than referring to zones of potential earthquake induced instability, as presented in the Seismic Hazard Zone Map for El Monte (CGS, 1999) included in Appendix V (A.1 –Attachment 1).

Hazardous Material Release
Landfill waste was historically disposed of under SR-60, in the Caltrans right-of-way, and in the steep slope of the South Parcel of the OII Site. The landfill waste under the roadbed and the Caltrans right-of-way is poorly characterized. The DEIS does not sufficiently demonstrate that construction and operation of the project on or near the OII Site would not result in the release of hazardous materials.

Recommendations:
EPA recommends that FTA/Metro map and characterize subsurface hazardous waste for the preferred alignment. A range of possible mitigation measures and their related costs should be presented to the public and decision makers to aid in understanding the possible design features that may be required in order to ensure human health and safety and to minimize environmental impacts, including commitments that construction and operation of the project on or near the OII Site would not result in hazardous material releases.

Groundwater Contamination Control
The DEIS discusses potential issues associated with encountering contaminated groundwater during pile construction and as part of construction dewatering activities, particularly if cast-in-drilled-hole (CIDH) piles are used (Table ES-2, Table 4.11-4). However, the DEIS does not discuss how pile construction and associated construction dewatering may adversely impact two of the operating perimeter liquids control systems at OII. Perimeter liquids control is being provided through groundwater extraction wells operating at the eastern end of the South Parcel and the western end of the North Parcel. The proposed Baseline SR-60 Alternative and North Side Design Variation both pass relatively close to these active systems and the depth to groundwater beneath the proposed light rail may only be 50-75 feet below ground surface.

Recommendation:
Analyze the potential impacts of construction and operation of the SR-60 Alternative on the existing perimeter liquids control containment systems at the OII Site and identify mitigation measures that will protect the integrity of the remedy.

Integrity of Remedy & Maintenance
In addition to the recommendations provided by EPA through the NEPA process, additional, significant pre-design investigation will be required to satisfy remaining uncertainties related to any Alternative selected that traverses the OII Site. Ultimately, the EPA Superfund Program will require assurance, outside of the NEPA process, that the light rail will not negatively impact the remedy in a way that compromises protectiveness of human health and the environment. This protectiveness includes maintaining landfill slope stability, methane gas collection systems, liquids/leachate collection systems, and groundwater protection. While both SR-60 design variations present these challenges, EPA notes that construction of the South Side Design Variation will require more significant and costly geotechnical analysis and design studies, in addition to offering much greater uncertainty, in comparison to the North Side Design Variation.

North Side Design Variation
To propose a SR-60 design variation with less uncertainty and risk, FTA/Metro, at the request of EPA, developed the SR-60 North Side Design Variation as an alternative alignment to the "Baseline SR-60 Alternative" for the portion of the route as it passes through the OII Site. EPA appreciates FTA/Metro developing a viable SR-60 variation to the north. The North Side Design Variation offers an opportunity to greatly reduce uncertainty and risks associated with a new light rail alignment through the OII Site, as it alleviates construction of the light rail at the toe of the steep slope that is part of the cap on the South Parcel of the OII Site. In addition, because of the extensive efforts of the 2010 Remedial Project for the North Parcel, the range of uncertainty confronting the proposed project on the North Side Design Variation is considerably reduced.

Although the North Side Design Variation is proposed as an alternative to avoid the South Parcel, and EPA agrees that it offers an opportunity to greatly reduce uncertainty and risks, we note that it still traverses a portion of the OII Site's South Parcel, and would also require additional analysis and measures to avoid potential impacts to the OII Site. Further, many of the landslide analyses and hazard evaluation needs of the baseline SR-60 Alternative (as described above) would also need to be completed for the North Side Design Variation. Though there are still some uncertainties associated with the North Side Design Variation, reliable information from North Parcel remedial activities can help address uncertainties and guide any pre-design investigation along the Caltrans right-of-way.

Recommendations:
EPA recommends FTA/Metro complete the necessary analyses described by FTA/Metro in the DEIS on page 4.11-24 and 4.11-30, and on page 12 of Appendix V as a part of the NEPA process, rather than deferring to a future project design timeframe. This would address the insufficient analysis related to uncertainty for all Build Variants on SR-60. EPA recommends presenting a comparison of the range of uncertainties and possible risks between the Baseline SR-60 Alternative and the North Side Design Variation, to clearly demonstrate the difference between the variations along SR-60.

On page 15 of Appendix V, and repeated in the main text of the DEIS, FTA/Metro states "The north side of the highway does not pose a slope stability concern because of the limited slope height, given the lay of the land." However, the DEIS does not include sufficient technical information to support this conclusion. For example, FTA/Metro provide documentation in Appendix V that the vertical and lateral limits of the landslides are not well understood, and are roughly based on small scale regional maps and limited subsurface data. Further, EPA is aware that there are some visibility concerns with the North Side Design Variation Alternative.

Recommendations:
Provide documentation to support the conclusion that the North Side Design Variation does not pose a slope stability concern.

Identify measures to address visibility concerns raised by the North Side Design Variation in relation to the future OII Site's North Parcel commercial development.

Site Access
The Greenwood Avenue Bridge connects the two OII parcels, is used by tall trucks, and hosts the utility connections that maintain remedy operations. By shuttling OII traffic onto this bridge, impacts to adjacent communities in Montebello are minimized. The DEIS does not specify the location of the North Side Design Variation's westernmost bridge that would cross SR-60, and what grade changes are necessary to protect the existing Greenwood Avenue Bridge and North Parcel pump-and-treat facility.

Recommendation:
Identify the location of the North Side Variation westernmost bridge across SR-60, and what grade changes are necessary to protect existing tall truck access on the Greenwood Avenue Bridge, or whether any changes to the Greenwood Avenue Bridge would be required.

Washington Boulevard Alternative

Omega Chemical Superfund Site Coordination

The DEIS correctly summarizes (pages 4.11-12, 4.11-20, 4.11-39) EPA's concern that the at-grade Washington Boulevard Alternative would be built in proximity to the contaminated groundwater plume under Washington Boulevard. The plume is originating from the former Omega Chemical facility in Whittier, CA, and commingled with contamination from other source areas such that contaminated groundwater extends approximately four and one-half miles into the cities of Santa Fe Springs and Norwalk. EPA's concerns include potential impacts to current and/or future remedial actions at the Site; contact with, and disposal of, contaminated soil and/or groundwater encountered during construction; and potential intrusion of vapors from the soil into structures.

Recommendation:

If the Washington Boulevard Alternative is selected as the Locally Preferred Alternative, EPA recommends that FTA/Metro evaluate the Alternative's potential impact(s) on remedial actions occurring or proposed at the Omega Chemical Superfund Site. Evaluate possible groundwater and/or soil vapor intrusion near proposed construction in the vicinity of the Site, and commit to mitigation measures, as appropriate, to address the potential impacts on remedial actions and potential intrusion of vapors into structures. FTA/Metro will need to ensure that construction of the light rail in this area will not disrupt current and proposed remedial actions in place at the Omega Site.

Transit Oriented Development and Community Involvement

EPA, in partnership with Department of Housing and Urban Development and Department of Transportation, encourages the advancement of sustainable communities, including transit-oriented development. As the DEIS (ES-3) and appendices (Appendix P, page 50) describe, the proposed project can lead to "potential new transit-oriented development opportunities around the station that would be beneficial to the community" and encourage growth and sustainable economic development (Appendix P, page 53). The DEIS recognizes community concerns about relocating 9 residences and 58 businesses (DEIS, Table 4.3-2), lost and displaced parking (DEIS, page 3-54), and low pedestrian volumes in the project area (DEIS, page 3-57). We encourage FTA/Metro to engage the community to identify mitigation measures and design features to best integrate the new facility in the existing setting if this Alternative is further studied.

The DEIS states that the Washington Boulevard Alternative may remove 1,685 or more (Table 4.3-2) parking spaces in phases before a total of 3,145 off-street parking spaces are provided at six proposed stations for this Build Alternative (DEIS, page 3-55). The DEIS also shows that when the replacement parking is built-out for the Washington Boulevard Alternative, it will exceed peak demand by 740 spaces (DEIS, page 3-55). Exceeding peak demand for parking at the proposed transit stations has the potential to affect transit choices and use by other modes, and may also induce car use.

Recommendations:

EPA encourages FTA/Metro to continue to engage communities that may be adversely impacted by the Washington Boulevard Alternative, and use that process to identify community issues, mitigation measures, and design options that FTA/Metro can commit to in developing the Build Alternative. EPA continues to encourage station area design that minimizes the number of parking spaces to the greatest extent possible at the station, and to prioritize intermodal, pedestrian, and bicycle access to encourage transit use and associated sustainable community development.