

City Manager’s Office

✚ No new updates at this time.

Human Resources

✚ No new updates at this time.

City Clerk’s Office

- ✚ Aside from day-to-day duties, the City Clerk's Office is working on the following:
- Policies and procedures for city-issued electronic devices (i.e., cell phones, laptops, tablets, etc.)
 - Policies and procedures for city commissions
 - Rules of decorum for city council meetings
 - Software for records retention and records request
 - Sister Cities potential relationship with San Miguel el Alto

Finance

✚ Cudahy's Public Self Insurers ER Annual Report and Self-Insurer's Profile and Financial Summary that was due by October 1, 2021 has been filed with the State of California Office of Self Insurance Plans. We are also preparing for an Audit beginning on Monday, October 4, 2021 of the Transportation Funds for FY 2020-21 that were received [from MTA] and spent on services to Cudahy residence as well as street improvement

Community Preservation

✚ **Community Preservation Monthly Summary Report for: June 2021**

- During the month of June, the Community Preservation Department issued 2 Violation Notices, 12 Friendly Reminders, and 3 Pre-Sale inspections were conducted.

✚ **Municipal/Parking Enforcement Summary Report for: June 2021**

- For the month of June, 8 vehicles were red tagged for 72hrs and 1 vehicle was towed for expired registration. 956 parking citations were issued.

Restricted Parking Monday 8:30am-1:30pm	346
Restricted Parking Tuesday 8:30am-1:30pm	397
Red Zone	93
No Tags	51
No Front Plate	17
Parking Fire Hydrant	15

Parking 18" from curb	9
Blocking Driveway	8
Vehicles on Sidewalk	5
Expired Registration	1
Parking in Fire Lane	1
Parking in Non-designated Parking area	1
Parking Disconnected Trailer	1
Parking on Priv/Pub Property w/o Consent	1
Parking Wrong Side of The Street	3
Repairing Vehicle on The Street	3
Double Parking	1
Temporary No Parking	3

Community Preservation Monthly Summary Report for: July 2021

- During the month of July, the Community Preservation Department issued **4** Violation Notices, and **13** Friendly Reminders.

Municipal/Parking Enforcement Summary Report for: July, 2021

- For the month of July, **3** vehicles were red tagged for 72 hours. **749** parking citations were issued.

Posted Street Weight Limited 6000 lbs	5
Red Zone	142
Restricted Parking Tuesday 8:30am-1:30pm	235
Restricted Parking Monday 8:30am-1:30pm	231
Parking in non-designated parking area	2
Parking disconnected trailer	2
Temporary no parking	6
Parking on priv/pub property w/o consent	9
Parking wrong side of street	2
Blocking driveway	14
Vehicles on sidewalk	3

Double parking	1
Parking in fire lane	3
Parking 18" from curb	4
Disabled parking off street	1
Parking fire hydrant	24

Community Preservation Monthly Summary Report for: August 2021

- During the month of August, the Community Preservation Department issued **16 Friendly Reminders**.

Municipal/Parking Enforcement Summary Report for: August 2021

- For the month of August, **7** vehicles were red tagged for 72 hours. **1,318** parking citations were issued.

Posted Street Weight Limited 6000 lbs	3
Red Zone	60
No Overnight Parking 3 am - 6 am	394
No Overnight Parking 12 am - 6 am	94
Restricted Parking Monday 8:30am-1:30pm	377
Restricted Parking Tuesday 8:30am-1:30pm	269
Parking on priv/pub property w/o consent	10
Parking wrong side of street	2
Repairing vehicle on street	1
Blocking driveway	8
Parking fire hydrant	19
Unattended Motor Vehicle Running	1
Expired registration	4
No front plate	26
No tags	50

Planning

- Planning staff in partnership with public works and EcoRapid, provided a comment letter to Metro regarding the WSAB Environmental Impact Statement/Environmental Impact

Report (EIS/EIR). We have focused our review on environmental justice, transportation, noise and vibration, aesthetics and visual impacts (including the project's appearance on aerial alignments, sound walls, and lighting). We have added comments highlighting deficiencies in the EIS/EIR analysis regarding whether the EIS/EIR adequately mitigates impacts with respect to City of Cudahy's residential neighborhoods along the alignment. A copy of the comment letter is attached (Attachment 1).

Engineering

- ✚ **Santa Ana St (Site 2) and Clara St (Site 6) Demolition Project** – Cudahy City Council awarded demolition services agreement to Precision Contracting, Inc., in their regular meeting held on 09/21/21. Contract agreement has been fully executed and a pre-construction meeting with the selected contractor is scheduled on 09/29/21 to coordinate demolition activities and project schedule.
- ✚ **City of Cudahy - Efficiency | Renewable Energy Project** – City Staff is currently working with SIEMENS Industry, Inc. to identify energy and operational savings of City facilities and City owned streetlights. A preliminary study has been completed by SIEMENS and in future issues, the Engineering Department will update you on the progress of this project.

Parks & Recreation

- ✚ **Special Events**
 - Saturday, October 1, 2021 – Swap Meet, Clara Street Park, 8:00 am to 3:00 pm.
 - Saturday, October 9, 2021 – Swap Meet, Clara Street Park, 8:00 am to 3:00 pm.
 - Thursday, October 14, 2021 – LA. Regional Food Bank, Clara Street Park 9:00 am to 12 noon
- ✚ **Pumpkin Patch Event.**
 - In partnership with Assemblymember Anthony Rendon's office, the City will be hosting a Drive-thru Pumpkin Patch Event. The event is scheduled to take place Saturday, October 16, from 9 am to 1 pm at Clara Street Park.
- ✚ **Draft Resolution Measure A Funds**
 - At the February 19 City Council Meeting, staff will be presenting a resolution to City Council for their consideration to approve the blanket authority to file applications for grant funds from the Los Angeles County Regional Park and Open Space District for Measure A funding for projects and programs. If the resolution is approved, staff will be seeking funds from Measure A to design, develop, and renovate Expansion Park in partnership with the Los Angeles Neighborhood Land Trust.
- ✚ **Grant Opportunities**
 - City staff will be pursuing grants that will help improve the quality of life for all Cudahy residents that can include but are not limited to repairs of City streets, park improvements, and planting trees throughout the City.

Maintenance

- ✚ **Maintenance Aide Worker Interviews**
 - City staff will be interviewing for part-time Maintenance Aide worker on Wednesday, October 6, 2021

 **Military Hometown Hero Banner Program**

- City staff is working on starting a program to honor veterans and active military service personnel. The City will recognize our heroes by displaying a banner along Atlantic Ave.

 **Yearly Tree Trimming**

- Starting on October 4, 2021, West Coast Arborist will be performing the yearly grid pruning on City trees. All trees east of Atlantic Ave. (parks and streets) including Atlantic Medians will be trimmed.

General Information

ATTACHMENT 1



CITY OF CUDAHY CALIFORNIA

Incorporated November 10, 1960

P.O. Box 1007
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Cudahy, California 90201-6024
(323)773-5143
Fax: (323) 771-2072

Ms. Meghna Khanna
Project Manager, Metro
One Gateway Plaza, M/S 88-22-7
Los Angeles CA 90012

Re: Comments West Santa Ana Branch Transit Corridor Draft Environmental Impact Report/Statement

Ms. Khanna,

The City of Cudahy has reviewed the West Santa Ana Branch (WSAB) Transit Corridor Draft Environmental Impact Report/Statement and supports Alternative 1 (Los Angeles Union Station to Pioneer Station) and Design Option 2 (Addition of Little Tokyo Station). The City of Cudahy along with other cities in the WSAB corridor strongly believes that by working together with the Los Angeles County Metropolitan Transportation Authority (Metro) and our state and federal elected representatives, we can obtain funding to build this line in an equitable, sustainable, and responsible manner. Our communities were some of the strongest supporters of Measures R and M transportation sales tax measures that are being used by Metro to fund the WSAB light rail project and it is time for us to benefit from the local sales tax measure.

As much as we support the project, our cities - especially after COVID-19's impact on local brick and mortar retail businesses and the subsequent loss of sales tax revenue - do not have the financial means to provide the 3% local match within the required 5-year period. We ask that Metro work with us to reduce the amount of local contribution and on identifying alternative non-city general fund revenue that can be utilized to satisfy this requirement. Additionally, we request that the existing 5-year time frame be extended and that the cities located in southeast Los Angeles only be required to pay its fair share of the 3% local contribution for the operating from Artesia to Slauson that directly benefits the Gateway Cities region. Eliminating the local 3% contribution costs associated with the improvements located in the City of Los Angeles is justified, fair and equitable.

As a region comprised of Environmental Justice Communities that are adversely impacted by environmental and socioeconomic factors affecting the health, environment and quality of life of local residents on a regular basis, we expect to be treated fairly and given the same consideration as past Metro projects serving other more affluent areas of Los Angeles County. As a Justice40 project, under the President Biden administration, we recognize the importance and opportunity of moving forward quickly together. However, the Draft WSAB EIR/EIS does not sufficiently address the environmental impacts created by the construction and operation of the transit line and protect the sensitive land uses;

minimize the impacts to traffic and parking; plan safety and security systems; protect our residential neighborhoods, industrial and business districts; minimize sound, vibration and particulate matter for all sensitive land use receptors, recognize the importance of the interdependence of communities and the impacts to taking a yard, a tree, a home, a business.

Each city both shares similar impacts and has ones that are unique to them. Eco-Rapid Transit is outlining the major impacts that need mitigation. For us, these additional impacts are critical. Additionally, we have provided comments below addressing focused review of environmental impacts.

We look forward to working with Metro to create a state of the art, sustainable transit corridor and to develop and implement an environmental mitigation program that addresses the impacts to our city.

Sincerely,

A handwritten signature in blue ink that reads "Salvador Lopez Jr." with a stylized flourish at the end.

Salvador Lopez Jr.
Interim Community Development Manager

This memo provides comments regarding the WSAB Environmental Impact Statement/Environmental Impact Report (EIS/EIR). We have focused our review on environmental justice, transportation, noise and vibration, aesthetics and visual impacts (including the project's appearance on aerial alignments, sound walls, and lighting). Our comments regarding noise and vibration impact analysis are limited by lack of direct expertise in acoustical engineering; however, we have added comments highlighting deficiencies in the EIS/EIR analysis regarding whether the EIS/EIR adequately mitigates impacts with respect to City of Cudahy residential neighborhoods along the alignment.

A. General Comments/Environmental Justice

1. The City of Cudahy has reviewed the West Santa Ana Branch (WSAB) Transit Corridor Draft Environmental Impact Report/Statement and supports **Alternative 1** (Los Angeles Union Station to Pioneer Station) and **Design Option 2** (Addition of Little Tokyo Station). **Implementing a single-seat LRT trip to Union Station is a critical environmental justice issue for Cudahy residents.** Alternative 3 would require two transfers to access Union Station and will disadvantage residents who are already burdened by a lack of efficient transit to downtown Los Angeles and the greater Los Angeles region. Multiple transfers may already be required for most Cudahy residents to access the WSAB line – why add more, and create disincentives to ride transit?
2. The City of Cudahy along with other cities in the WSAB corridor strongly believes that by working together with the Los Angeles County Metropolitan Transportation Authority (Metro) and our state and federal elected representatives, we can obtain funding to build Alternative 1 in an equitable, sustainable, and responsible manner. Our communities were some of the strongest supporters of Measures R and M transportation sales tax measures that are being used by Metro to fund the WSAB light rail project and it is time for us to benefit from the local sales tax measure.
3. As much as we support the project, the city of Cudahy as well as the other cities along the WSAB corridor - especially after COVID-19's impact on local brick- and-mortar retail businesses and the subsequent loss of sales tax revenue - do not have the financial means to provide the 3% local match within the required 5-year period. We ask that Metro work with us to reduce the amount of local contribution and on identifying alternative non-city general fund revenue that can be utilized to satisfy this requirement. Additionally, we request that the existing 5-year time frame be extended and that the cities located in southeast Los Angeles only be required to pay their fair share of the 3% local contribution for the operations from Artesia to Slauson that directly benefit the Gateway Cities region. Eliminating the local 3% contribution costs associated with the improvements located in the City of Los Angeles is justified, fair and equitable.
4. As an Environmental Justice community that is adversely impacted by environmental and socioeconomic factors affecting the health, environment and quality of life of local residents on a regular basis, we expect to be treated fairly and given the same consideration as past Metro projects serving other more affluent areas of Los Angeles County. The Draft WSAB EIR/EIS does not sufficiently address the environmental impacts created by the construction and operation of the transit line, does not protect sensitive

land uses, does not minimize the impacts to traffic and parking, does not plan safety and security systems, does not protect our residential neighborhoods, industrial and business districts, does not minimize sound, vibration and particulate matter for all sensitive land use receptors, does not recognize the importance of the interdependence of communities, and does not thoroughly address the impacts of taking all or part of residential yards, or trees, homes, or businesses.

5. The City of Cudahy concurs with all issues raised by the Board of Eco-Rapid Transit, a.k.a. the Orange Line Development Authority, regarding the WSAB Draft EIS/EIR.

B. Transportation/Traffic Engineering Comments

1. General Comments

- a. Section 9, References. Several items directly related to the West Santa Ana Branch analysis by Los Angeles County Metropolitan Transportation Authority (Metro) do not provide hyperlinks to easily cross reference. For example, first reference on page 9-3, Corridors Base Model 2018 Calibration and Validation Report, does not provide a hyperlink to the document.
- b. The EIS/EIR and appendices fail to show the Synchro analysis data. There are no analysis sheets provided that detail the HCM/Synchro model analysis of the study intersections. The City is unable to determine if the Synchro analysis is correct without reviewing the analysis sheets. Please provide all Synchro analysis sheets, including the Synchro input files, for the City's review.
- c. Blank pages. There are pages that appear to be left blank intentionally. Please identify these pages appropriately (for example, see Page A6-2).
- d. Headways. Tables showing Headways do not clarify that headways are in minutes (for example, see Table 5.17).

2. Appendix D - Transportation Impact Analysis Report

- a. Page 1-6, last paragraph – The paragraph begins with “Figure 1-2”. This is the wrong reference. Should this be Figure 1-1?
- b. Section 1.5.1, Analysis Approach: Traffic Operations (Page 1-7) – What are the default value inputs used for coding the HCM/Synchro model analysis? Program default values may not represent study locations and should be adjusted to simulate actual field conditions. Section 9 References do not appear to include any analysis detail reports/studies.

- c. Section 1.5.10, Applying LOS for Impact Assessment (Page 1-14) – How did the HCM/Synchro software simulate a rail crossing operation? It is our understanding that Synchro has limited ability to properly simulate a train crossing event. The main concern in using the Synchro software is that the schedule of events (an event is a train crossing and activating the gate) cannot be set and controlled in the model. So, even though headways of the trains are known, that information cannot be inputted into the model. The model generates vehicles randomly and as a result, a fixed set of assumptions and known conditions could generate different output results in separate runs. How many Synchro analysis runs were conducted to determine the delay and 95% vehicular queue for the study intersections?
- d. Figure 2-2. Project Alignment by Alignment Type (Page 2-4) – The line definitions/legends for the “At-Grade, Aerial, and Underground” call outs are difficult to determine because of the scale of the map. Unless the reader translates line-by-line the details found on pages 2-12 to 2-14, the different line types are not distinguishable. How can this Figure be improved to clearly identify the proposed track position?
- e. Table 4.46. On-Street Parking Conditions: Proposed Locations (Page 4-50) – Parking demand observations were made in 2017. Based on these observations near the Florence/Salt Lake station, the parking demand was 30%. Additional details on the observed parking can be found in Table 4.62 (excerpt below).

Station	Parking Survey Area ^a (acres)	Applicable Alternative(s)	Existing On-Street Parking Spaces	Observed Field Utilization
Florence/Salt Lake	108.0	1, 2, 3	1,106	30%

- f. Table 5.4. 2042 Build Alternative 2 Operations (Page 5-9) – This table identifies the delay (seconds) and Level of Service (LOS) for Alternative 2. The traffic impacts of Alternative 3 (Staff Preferred Alternative) “would be equal to or less than those at the same facilities for Alternative 2” (page 5-16, Section 5.1.4, Alternative 3: Slauson/A (Blue) Line to Pioneer Station). The impacts for the City of Cudahy (pages 5-11 and 5-12) are shown in the excerpt below.

This Table indicates that 5 intersections in the City of Cudahy will be not significantly impacted by the WSAB project. The delay at intersection nos. 56, 57, and 59 are less than the No Build alternative.

As previously stated, there are no analysis sheets provided that detail the HCM/Synchro model analysis of the study intersections. We are unable to determine if the analysis

methodology and inputs are appropriate. Provide all Synchro analysis sheets, including the Synchro input files, for the City’s review.

No	Intersection Name	Jurisdiction	No Build Peak Hour Delay/LOS ^a	Alternative 2 Peak Hour Delay/LOS ^b
56	Otis Ave/Salt Lake Ave (East)	Cudahy	83/F-AM 104/F-PM	36/E-AM 93/F-PM
57	Otis Ave/Elizabeth St	Cudahy	1452/F-AM 1473/F-PM	342/F-AM 366/F-PM
59	Santa Ana St/Salt Lake Ave (East)	Cudahy	219/F-AM 265/F-PM	146/F-AM 100/F-PM
60	Ardine St/Salt Lake Ave	Cudahy	24/C-AM 20/C-PM	25/D-AM 16/C-PM
61	Atlantic Ave/Salt Lake Ave	Cudahy	51/D-AM 81/F-PM	53/D-AM 81/F-PM

g. Table 5.5. 2042 Build Alternative 2 - 95th Percentile Queues from Upstream Crossing to Intersection (Page 5-14) – This table, also excerpted below, indicates queue lengths can be accommodated at locations within the City. The City has several questions and comments regarding the intersections identified in the table.

i. Will the southbound queue on Otis Ave block access to the intersection of Otis Ave/Elizabeth St? If so, what mitigation measures will be implemented to address this blockage?

Crossing ^{a, b}	Intersection to the North/East of Train Crossing	Distance from Intersection Back to Rail Crossing (feet)	Build Alternatives 95th Percentile Queue ^c (feet)	Intersection to the South/West of Train Crossing	Distance from Intersection Back to Rail Crossing (feet)	Build Alternatives 95th Percentile Queue ^c (feet)
Otis	Otis Ave/ Salt Lake Ave (East)	Intersection operations coordinated with the adjacent crossing		Otis Ave/ Salt Lake Ave (West)	Intersection operations coordinated with the adjacent crossing ^e	
Santa Ana	Santa Ana St/ Salt Lake Ave (East)	Intersection operations coordinated with the adjacent crossing		Santa Ana St/ Salt Lake Ave (West)	Intersection operations coordinated with the adjacent crossing	
Ardine ^f	Ardine St/ Salt Lake Ave	Intersection operations coordinated with the adjacent crossing		N/A	N/A	

ii. Otis Ave/Salt Lake Ave (East) and Otis Ave/Elizabeth St are both all-way Stop controlled intersections. How will “Intersection operations coordinated with

adjacent crossing” be accomplished? Based on the physical distance of these 2 intersections to the Rail Crossing, both intersections should become fully signalized intersections with the Rail Crossing. The signal operation of Otis Ave/Salt Lake Ave (East) and Otis Ave/Elizabeth St should be coordinated with the use of a single traffic controller for both intersections.

- iii. The Otis Ave/Salt Lake Ave (West) intersection is also an all-way Stop controlled intersection. How will “Intersection operations coordinated with adjacent crossing” be accomplished? Due to the Otis Ave/Salt Lake Ave (West) intersection located directly adjacent to the Rail Crossing, this intersection should become fully signalized with the Rail Crossing.
 - iv. Overall, the Rail Crossing at Otis Ave has 3 Stop controlled intersections very close to one another and the Rail Crossing. The 3 intersections should be signalized and be closely coordinated to ensure traffic flow over the Rail Crossing is minimally impacted.
 - v. Santa Ana St/Salt Lake Ave (East) is immediately adjacent to the Rail Crossing. Based on this physical distance, this intersection should become fully signalized with the Rail Crossing.
 - vi. Santa Ana St/Salt Lake Ave (West) is immediately adjacent to the Rail Crossing. There is also a spur line that is west of the WSAB rail line. Based on the 2 rail lines and the physical distance between the intersection and the Rail Crossing, this intersection should become fully signalized with the Rail Crossing.
- h. Table 5.53. On-Street Parking Impacts (Page 5-63) – This Table, excerpted below, summarizes the on-street parking impacts of each Alternative. The Florence/Salt Lake Station discussion indicates that Alternatives 1, 2, and 3 would have no impact (“No change”) to on-street parking in the City of Cudahy. The City does not concur with this conclusion.

Location	Jurisdiction	Existing On-Street Parking Spaces	Observed Field Utilization ^a	Parking Spaces Added/Removed ^b	Alternative(s) Affected	Description of Effect
Florence/Salt Lake Station	Huntington Park	1,106	30%	0	1, 2, 3	No change.

On-street parking is generally in high demand in residential neighborhoods throughout the City. The proposed mitigation measures (TRA-21: Parking Monitoring and Community Outreach, and TRA-22: Parking Mitigation Program (Permanent)) may be helpful but even the Report states (Page 5-62) “it is possible that adverse effects would remain after mitigation.” The WASB project must address the loss of any on-street parking to the satisfaction of the City and its residents, including spillover impacts.

- i. Table 5.54. Off-Street Parking Impacts (Page 5-65) – These off-street parking impacts are adjacent to the City of Cudahy but primarily in Huntington Park. How will this loss of parking be mitigated?

Location	Jurisdiction	Project Element	Alternative(s) Affected	Number of Lost Spaces	Approximate % of Total Parking	Remaining Spaces Within Code Requirements?
Strip mall on the northeast corner of Walnut Street and California Avenue	Huntington Park	TPSS Site 13(E)	1, 2, 3	13	30%	yes

- j. Spillover Parking Impacts (Page 5-68) – This section discusses the Florence/Salt Lake station in the following paragraph:

“On-street parking around the Pacific/Randolph, Florence/Salt Lake, and Gardendale Stations is largely time unlimited and was 60 percent or less utilized at the time of surveys. While it is not anticipated that transit passengers would access these stations via car because dedicated parking is not provided, on-street parking capacity is available to accommodate those who may try to do so without passengers displacing others using the spaces. Therefore, adverse effects from spillover parking would not occur.”

The City disagrees with this statement. As stated previously, on-street parking in the City of Cudahy is in high demand especially in residential neighborhoods. Without dedicated parking for the Florence/Salt Lake Station, many rail passengers will likely be seeking parking in the surrounding neighborhoods, particularly because connecting transit is very limited in these neighborhoods. The proposed mitigation measures (TRA-21: Parking Monitoring and Community Outreach, and TRA-22: Parking Mitigation Program (Permanent)) must be applied to the Florence/Salt Lake Station especially with no on-site parking proposed. The WASB project must address the loss of any on-street parking to the satisfaction of the City and its residents.

- k. Section 7.3.2.2 Traffic Operations Effects (Page 7-25) – The construction impacts to the City are not clearly identified. This section describes general impacts to traffic circulation. Mitigation measure TRA-20, Transportation Management Plan (TMP) “will address construction impacts on transportation facilities under the jurisdiction of all involved cities and agencies, including Caltrans.” We are requesting the EIS/EIR and the Transportation Impact Report indicate the timing of construction for those project elements located in the City of Cudahy.

C. Noise and Vibration

1. Page 4.248 of the DEIS/DEIR refers to “clusters” of sensitive land uses and lists impacts and mitigated impacts in Tables 4.7.7 through 4.7.10, but until Figures 4.7-5 through 4.7-11 there is no *mention* of where these clusters are. The document should alert the reader that the clusters are shown graphically in the respective Figures. Tables 4.7.7 – 4.7.10 should include a column labeled “City” adjacent to the column labeled “Cluster No.” Figures 4.7-5 through 4.7-11 should also show boundaries for all cities and unincorporated areas along the route.
2. Clusters No. N129, N130, N131, N136, N137, N138, N139, N140, N144, N145, N152, N153, N164, N165, N166, and N168 are within the City of Cudahy. Table 4.7.7 does not list impacts for N129, N130, N131, N136, N138, N139, N145, and N152. Nothing in the text indicates why these clusters were left out. Impacts to these receptors should be identified and if required, mitigated.
3. Efficacy of sound walls should be described within the EIS/EIR. Tables 4.7-4.7.10 show reductions in dBA and resulting levels of impact, but the text does not describe how sound walls work to accomplish impact reduction, and there are no graphics that show how sound is attenuated by walls of particular heights and distance from the source or receptor. Sound wall materials are not described. Moreover, Appendix M does not show sound-attenuation diagrams, nor does it describe how either surface-mounted or aerial sound walls work to mitigate impacts. The City requests that this information be included in the EIS/EIR itself, not simply by reference to Appendix M.
4. Sound walls may also reflect sound to other receptors. Has this been considered? Reflected sound potential must be identified and mitigated.
5. There are several receptor sites where sound walls have been deemed infeasible (Table 4.7.8). The DEIS/DEIR presents no alternative mitigation measures, such as adding insulation and/or replacing windows of affected structures. Even where sound walls are indicated to be feasible, some remaining impacts are still deemed “severe.” Why are no additional mitigation measures suggested? Excessive noise and vibration must be mitigated to protect residents and other sensitive receptors.
6. The DEIS/DEIR does not show noise contours along the projected WSAB route. Why? Noise contours should be illustrated, both for the proposed project and for nearby arterials where that information is available.
7. Are there alternative wheel materials that could be employed to reduce noise? The DEIS/DEIR does not discuss whether alternatives were considered, and if so, why they were rejected.
8. The DEIS/DEIR should describe how the “low-impact frogs” or ballast mats work, and whether there are additional measures that could be used to attenuate vibration where impacts would remain severe.
9. Mitigation Measure NOI-1, Soundwalls, states that “Soundwalls *would* be placed...” (emphasis added). Language like “shall” or “will” instead of “would” gives the reader a greater degree of confidence that the measure will be implemented. The word “would” is not consistent with a mandatory measure.

10. Mitigation Measures NOI-2 through NOI-7 also use “would” instead of “shall.” See comment 9.

D. Aesthetics/Visual Impacts

1. Sound walls. Nothing in the EIS/EIR discusses the proposed sound walls’ appearance. There are numerous residential properties along Salt Lake Avenue that will face the WSAB tracks and sound walls. Specifically, the view from the public right-of-way as well as from private residential properties on the approximately 2,400’ segment of Salt Lake Avenue between Walnut Street and Olive Street would be interrupted by an eight-foot tall wall and views of the residential area west of the tracks would be obscured. While Cudahy acknowledges that protection from excessive noise is necessary, the WSAB project must also avoid creating visual blight. The EIS/EIR dismisses the visual effects of sound walls by stating that they are similar in scale to “surrounding structures” – e.g., houses and other landscape walls and fences along the WSAB corridor (Table 4.4.6, p. 4-150). This is plainly untrue, not only for this segment: residential walls and fences in front yards typically do not exceed four feet in height and do not block views. Table 4.4.6 further states that “viewer sensitivity would be low” and that “viewers would have little to no reaction to the change.” What evidence supports this conclusion?

What measures would be taken to make the sound walls visually pleasing? Figure 4.4-6 provides an illustration of “Proposed Salt Lake Avenue” but does not show an eight-foot tall wall. Instead, the sketch shows a shorter wall topped by fencing, without substantial detail. This is an improper depiction of the proposed wall system. The EIS/EIR should show scaled cross-sections that include residential façades as well as photo-simulations of sound walls so that the true visual impact can be assessed. Moreover, the EIS/EIR should provide examples of sound wall surface finishes and colors. Such finishes must not only be graffiti-resistant but must also be visually attractive using textures and patterns. Opportunities for murals should also be explored.

2. Light and Glare. Table 4.4.6 dismisses the potential for light and glare impacts, in part because sound walls would block train lights. However, the proposed sound wall along the Salt Lake Avenue segment referenced above faces northeast, and could produce glare during early morning hours, particularly during the summer. The EIS/EIR should explain glare caused by WSAB surfaces and provide solutions to mitigate such glare, including surface textures, patterns, and colors.

E. Conclusion

The City of Cudahy strongly requests that Metro address and mitigate the above concerns. Impacts associated with traffic and transportation, noise and vibration, aesthetics, and environmental justice are of critical concern to Cudahy residents. While Cudahy understands that any project such as the proposed WSAB line will *change* the existing environmental baseline, significant adverse changes must be avoided or mitigated as much as possible.

Thank you for the opportunity to review and comment on this important regional project. Please keep the City apprised of all documents, community meetings, and public hearings on the project as it moves forward.