Santa Monica-Malibu Unified School District Board of Education Meeting UPDATE TO THE AGENDA

March 19, 2009

CLOSED SESSION

• Receipt of recommendation for approval of the proposed settlement cases pursuant to GC §54956.9 (b), as cited in the Brown Act (10):

DN-1024-08/09

DN-1030-08/09

DN-1031-08/09

CONSENT AGENDA

A.05 Approval of Special Education Contracts – 2008-2009 **EDIT**: Removal of instructional contract (page 3 of this Update)

MAJOR ITEMS

A.22 EXPO Phase II District Comments on Draft EIR (30)

EDIT: The details of the agenda item were not ready when the agenda went to print (pages 6-15 of this Update)

DISCUSSION ITEMS

INFORMATION ITEMS

SW

TO: BOARD OF EDUCATION <u>ACTION/CONSENT</u>

03/19/09

FROM: TIM CUNEO / CHIUNG-SALLY CHOU / RUTH VALADEZ UPDATE

RE: APPROVAL OF SPECIAL EDUCATION CONTRACTS - 2008-2009

RECOMMENDATION NO. A.05

It is recommended that the Board of Education approve the following Special Education Contracts for fiscal year 2008-2009 as follows:

NPS 2008-2009 Budget 01-65000-0-57500-11800-5125-043-1400

Nonpublic School/Agency	Student DOB	Service Description	Contract Number	 st Not Exceed
Intermountain Deaconess	11/11/95	NPS	#55-	\$ 13,050
Home for Children			UC09260	

Amount Budgeted NPS 08/09 Prior Board Authorization as of 03/05/200)9	•	,500,000 ,552,649
	Balance	\$	52,649
Positive Adjustment (See Below)		\$	0
Total Amount for these Contracts	Balance	\$ \$	13,050 -65,699

Adjustment						
NPS Budget 01-65000-0-57500-11800-5125-043-1400						
There has been a reduction in authorized expenditures of NPS/NPA contracts for FY 2007-08 in the amount of \$ 0 as of 3/19/09						
NPS	Service Description	Contract Number	Reduce (R) Eliminate (E)	Adjusted Amount	Comment	

NPA2008-2009 Budget 01-65000-0-57500-11800-5126-043-1400

Nonpublic	Student	Service	Contract	Co	st Not
School/Agency	DOB	Description	Number	to	Exceed
The Kelter Center	4/18/93	IEP Attendance	#43- UC09269	\$	420
Maxim Healthcare- contract increase	Various	Aide	#23- UC09141	\$	35,332

Amount Budgeted NPA 08/09		\$	1,400,000
Prior Board Authorization as of 03/05/09		\$	1,243,716
	Balance	\$	156,284
Positive Adjustment (See Below)		\$	0
Total Amount for these Contracts		\$	35,752
	Balance	Ś	120.532

Adjustment

NPA Budget 01-65000-0-57500-11800-5126-043-1400

There has been a reduction in authorized expenditures of NPS/NPA contracts for FY 2007-08 in the amount of \$ 0 as of 03/19/09

NPA	Service Description	Contract Number	Reduce (R) Eliminate (E)	Adjusted Amount	Comment

NPA PRE SCHOOL

2008-2009 Budget 01-65000-0-57300-11800-5125043-1400

	Nonpublic School/Agency	Student DOB	Service Description	Contract Number	Cost Not to Exceed
•	Amount Budgeted NPA Pre School 08/09 Prior Board Authorization as of 03/05/09			'	100,000
	Balance				-20,460
	Total Amount for these Contracts			\$	0
			Balance	\$	-20,460

Instructional Consultants

2008-2009 Budget 01-65000-0-57500-11900-5802-043-1400

Instructional Consultant	Student DOB	Service Description	Contract Number	Cost Not to Exceed
Anthony Truong	Various	Behavioral Consultant	#1- UC09030	\$ 3,400
JBA Institute	10/16/00	Behavior Intervention	#52- UC09266	\$ 39,600
Lisa Ulrich	10/11/02	Physical Therapy	#41- UC09204	\$ 2,400

Amount Budgeted Instructional Consu	lltants 08/09	\$	310,000
Prior Board Authorization as of 03/	05/09	\$	516,226
	Balance	\$-	206,226
Positive Adjustment (See Below)		\$	0
Total Amount for these Contracts		\$_	42,000
	Balance	\$	-248,226

Adjustment

Instructional Consultants Budget 01-65000-0-57500-11900-5802-043-1400

There has been a reduction in authorized expenditures of Instructional Consultants contracts for FY 2008-09 in the amount of \$\frac{1}{2}\$ as of 3/19/09

Instructional	Service	Contract	Reduce (R)	Adjusted	Comment
Consultant	Description	Number	Eliminate	Amount	
			(E)		

Instructional Consultants -INFANT

2008-2009 Budget 01-65000-0-57100-11900-5802-043-1400

Nonpublic	Student	Service	Contract	Cost Not
School/Agency	DOB	Description	Number	to Exceed

Amount Budgeted Instructional Consult-Infants 08/09 \$ 15,000

Prior Board Authorization as of 03/05/09 \$ 19,130

Balance \$ -4,130

Total Amount for these Contracts \$ 0

Balance

Instructional Consultants -PRE SCHOOL

2008-2009 Budget 01-65000-0-57300-11900-5802-043-1400

Nonpublic	Student	Service	Contract	Cost Not
School/Agency	DOB	Description	Number	to Exceed

Amount Budgeted Instruct Consult-Pre School 08/09 \$ 175,000
Prior Board Authorization as of 03/05/09 \$ 53,220
Balance \$ 121,780

Balance \$ 121,780

Non-Instructional Consultants

2007-2008 Budget 01-65000-0-57500-11900-5890-043-1400

Non-Instructional Consultant	Student DOB	Service Description	Contract Number	Cost Not to Exceed
Pawar Transportation	8/12/97	Transportation	#21- UC09265	\$ 720
Parent Reimbursement	9/29/91	Transportation to NPS	#23- UC09268	\$ 1,200
Pawar Transportation	8/16/95	Transportation	#22- UC09267	\$ 11,900
Parent Reimbursement	10/19/92	Transportation to NPS	#24- UC09270	\$ 1,200

Amount Budgeted Non-Instructional Consultants 08/09 \$ 144,000 Prior Board Authorization as of 03/05/09 \$ 147,699 Balance \$ -3,699 Positive Adjustment (See Below) \$ 0 Total Amount for these Contracts Balance \$ -18,719

Adjustment

Non-Instructional Consultants Budget 01-65000-0-57500-11900-5890-043-1400

There has been a reduction in authorized expenditures of Non-Instructional Consultants contracts for FY 2008-09 in the amount of \$ as of 03/19/09

Instructional Consultant	Service Description	Contract Number	Reduce (R) Eliminate (E)	Adjusted Amount	Comment

Legal 2007-2008 Budget 01-65000-0-57500-11900-5820-043-1400

Legal Contractor	Service Description	Contract Number	Cost Not to Exceed

Amount Budgeted Legal Services 08/09 Prior Board Authorization as of 03/05/09 Adjustments for this period	Balance	\$ 200,000 712,500 \$ -512,500 \$ 0
Total Amount for these Contracts	Balance	\$ -512,500 \$ 54,708 \$ -567,208

COMMENT: According to the Education Code SEC.21 Section 56342, prior to recommending a new or continued placement in a non-public, non-sectarian school, the Individualized Education Program (IEP) Team must submit the proposed recommendation to the local governing board for its review and recommendation regarding the cost of such placement.

The recommendation for these severely handicapped students are made by the District IEP Teams in accordance with State and Federal laws. The mandates of IDEA require non-public school services be provided at no expense to parents if there is not an appropriate public school program available. Funding to come from a SELPA-wide non-public school/non-public agency reserve account.

MOTION MADE BY: SECONDED BY:

STUDENT ADVISORY VOTE:

AYES:

TO: BOARD OF EDUCATION

ACTION/MAJOR 03/19/09

UPDATE

FROM: TIM CUNEO

RE:

DISTRICT COMMENTS ON DRAFT EIR

RECOMMENDATION NO. A.22

It is recommended that the Board of Education authorize the President and Superintendent to submit the attached comment letter on the Draft EIR for Phase 2 of the Expo Light Rail Project, formally support the adoption of the "Colorado" alternative as the District-supported alignment for the Exposition Light Rail Phase 2 project within the City of Santa Monica and recommend to the Exposition Construction Authority (Expo Authority) and the Los Angeles County Metropolitan Transportation Authority (Metro) that the "Colorado" alternative be selected as the alignment within the City of Santa Monica.

Additionally, it is recommended that the Board direct District staff to:

- 1. Work with the Metro Rail Safety Program to assure that rail transit safety education is provided annually to all students at Santa Monica schools.
- 2. Explore with the Expo Authority, the City of Santa Monica and the California Public Utilities Commission a narrower track width configuration on Colorado Avenue west of 17th Street, consistent with other locations in California, in order to accommodate on-street parking on both sides of 17th Street.
- 3. Work with City of Santa Monica staff regarding parking needs (i.e. park-and-ride, kiss-and-ride and bike parking), including a management plan, for each Santa Monica station as such analysis relates to District property, particularly Joint Use opportunities at Samohi and the District office and bring back recommendations to Board of Education.
- 4. Work with the City of Santa Monica and the Expo Authority to obtain a waiver or revised policy so that riders may be charged for the use of any parking near rail stations within the City of Santa Monica.
- 5. Work closely with Expo Authority and City staff during station area planning and design for all three Santa Monica stations as such designs may impact schools and other District owned facilities.

- 6. Work with City Staff and the Expo Authority to resolve the Expo Bike Path routing issues to provide healthy and Safe Routes to School for its students, parents and staff.
- 7. Work with City staff and the Expo Authority to minimize the visual impact of the overhead train electrification wires and support structures.

MOTION MADE BY:
SECONDED BY:
STUDENT ADVISORY VOTE:

AYES: NOES: DATE: March 19, 2009

Monica Born, P.E., Project Director Exposition Corridor Transit Project Phase 2 Exposition Metro Line Construction Authority 707 Wilshire Boulevard, Suite 3400 Los Angeles, CA 90017 Also Emailed to Phase2@exporail.net

Dear Ms. Born:

Thank you for the opportunity to comment as an affected public agency and major employer, on the Exposition Phase 2 Project between Culver City and Santa Monica. In addition to the comments below, the District presented verbal comments at the **February 18, 2009** Expo hearing and at the Santa Monica City Council hearing on **March 3, 2009**. We especially appreciate your offer to meet with District officials and City staff on **March 12** to discuss consultation with the School District, Expo and the City of Santa Monica as you move ahead with alignment and station planning and prepare the Final EIR identifying potential impacts and mitigation measures in response to comments on the DEIR.

The **Santa Monica-Malibu Unified School District** strongly supports construction the Expo Phase 2 Light Rail Project for the expanded sustainable transportation options it will provide to our students, staff, parents and community members. Expo light rail service will improve access to cultural, recreational, educational and athletic opportunities within the Westside and the larger Los Angeles County area while reducing travel time, cost, and congestion.

SMMUSD supports the Colorado alignment over the Olympic alignment. Routing the light rail along



and off ramps at 4th Street and Lincoln Avenue.

Colorado better serves an area mixed-use with dense development. The Olympic alignment would have negative noise and visual impacts from the aerial downtown station and elevated rail line on both Santa Monica High School and the District-owned Doubletree hotel. The elevated rail structure also potentially conflicts with the proposed bicycle and pedestrian bridge across the freeway to Santa Monica High at Seventh Street. This bridge is needed to provide a safe route over the I-10 for pedestrians and cyclists, which avoids hazards at the freeway on

SAFETY HAZARDS FOR SCHOOL AGE CHILDREN

Parents have expressed serious concerns about increased hazards of injury from LRT collisions with pedestrians and cyclists, especially school age children. While no District schools are located directly adjacent to the Colorado or Olympic alignment, within a quarter mile of stations are: McKinley Elementary, Edison Elementary, and Santa Monica High School. Both Santa Monica middle schools, John Adams and Lincoln, are located just over half a mile from the 17th Street Station, on the heavily used Mini Blue Crosstown Ride route. Many of these students walk, skateboard, bike or take transit unaccompanied to and from school, home and after school activities. They are potentially at risk from collision with the LRVs or from traffic congestion and loss of visibility at crossings related to the light rail line.

Many District students also participate in programs at the Police Activities League at Olympic and 14th, or in after school, weekend and summer sports programs at Memorial Field, located between the Colorado and Olympic rail alignments. Parents at Crossroads School have expressed concerns about potential dangers from trains to their students and school staff who must cross Olympic between their two facilities frequently each day. District staff, students, parents and teachers working or attending meetings and training at the District offices are also exposed to hazards from such collisions.

Section 3.15.5 Safety and Security describes in remarkably few pages the potential dangers of pedestrians being struck by LRT or other vehicles at station stops or in crossing the right of way. The section does not acknowledge the **increased hazards for younger and school age children**, who lack experience in depth and speed perception, knowledge of traffic rules, and the height, speed and judgment to escape potential hazards. Given that this issue was the subject of controversy in Phase 1, which travels past several LAUSD campuses, the analysis of safety hazards for school children, especially at school start and dismissal time, is particularly essential. Presumably traffic hazards to school age children would be generally reduced under the Colorado alignment, primarily because most existing facilities serving school age children are on Olympic, and vehicular traffic travels faster there, thus increasing risk of serious injury.

A more complete analysis of traffic hazards and of potential mitigation measures should be included in the FEIR to study this important issue. Among the mitigation measures, which should be included, should be ongoing Expo funding for traffic safety training for all school children in the affected school districts or in schools within ½ mile of the rail line in LAUSD, Culver City Unified, and SMMUSD. This training should be provided to students at elementary, middle and high schools and include age-appropriate training in safe pedestrian and rail transit use, including crossing rail right of ways and navigating station area transfers on foot, bicycle, and bus. While the DEIR mentions the Rail Safety and Outreach Department programs including the Rail Safety Education Program and the Orientation Safety Program on page 3.15-6, there is no commitment in the form of a mitigation measure to provide these programs to schools likely to face increased hazards along the rail alignment. In addition, any safety mitigation measures instituted at or near schools on Phase 1 should be instituted at the 4th and Colorado and 17th Street Stations, given the high amount of use by school age children.

PUC Exception Request for Reduced Right of Way to Preserve Parking on Colorado

We support further analysis in the FEIR of the City of Santa Monica request for a PUC exception to provide a narrower 24 foot rail right of way with the Colorado alignment. We understand this narrower right of way would be consistent with other light rail systems, in order to retain parking on both sides of Colorado. Preserving the on street parking on both sides would help alleviate the existing shortage of public parking which impacts daily operations and public meetings at the District office.

However, any safety implications of the decreased right of way, which might increase potential danger in crossings, **should be carefully addressed in the FEIR** so the tradeoffs between retaining parking and potential danger to pedestrians, especially school age children, can be assessed. These potential dangers require careful study and consideration in design, particularly in the area around Memorial Park, near the 17th Street station, attracts many school age children, often without accompanying adults.

Addition Pedestrian Crossings and Station Access between 14th and 17th Street

While pedestrians, cyclists and vehicles can currently cross Colorado at 16th, the map shows that for the Colorado alignment, the 17th Street platform and design of medians will prohibit this movement. The DEIR does not clarify the potential impacts from the project on the safety and convenience of pedestrian access, nor does it include a discussion of where fences along the right of way might be erected to physically prohibit pedestrian crossings in this heavily used area.

We understand there are concerns by the City of Santa Monica about not including fencing of the right of way and maximizing additional pedestrian crossings beyond the currently signalized intersections. We were referred to page 3.2-33 when asking about whether additional pedestrian crossings would be available in addition to 14th Street and 17th Street to serve youth programs and activities at Memorial Park, and the District Office.

We feel there should be further discussion of this safety issue to inform decision makers and the next phase of the project. Due to the anticipated very heavy use by Santa Monica College and hospital staff, it may be important to provide an additional pedestrian crossing at 15th Street or 16th Street to supplement the 14th Street and 17th Street signalized crossings and allow station loading from both ends of the platform. At such additional crossings, median refuges, signal lights and other safety features should be considered.

Safe Routes to School and Metro Rail Safety Education for Santa Monica Schools

The discussion of the Expo project on **Safe Routes to School impacts** on p. 3.2-84 considers only the LADOT SRTS routes identified within the City of Los Angeles. While Santa Monica does not have the same system, the District and City of Santa Monica have ongoing Safe Routes collaborations. Routes used by school children walking and cycling across the rail right of way include Stewart, 26th, Cloverfield, 20th, 17th, 14th, 11th, Lincoln and 4th Street. Both middle and high schools have significant numbers of student cyclists as well as pedestrians and transit users.

Most of the safety mitigation measures identified in the DEIR involve gates and signals which would not apply with the street-running, traffic signal controlled type of service to be provided in most of Santa Monica. Safety data for the Gold Line may not be fully comparable, since this system combines gated and ungated segments.

We propose that as a mitigation measure for potential safety risks, the FEIR include providing the **Metro Rail Safety Education Program to all school age children in Santa Monica**, with an emphasis on the type of crossings and safety tips for the street-running, traffic signal controlled trains near their homes and schools. In preparing these comments, we consulted Barbara Burns from the Metro Rail Safety Programs. She stated that the program includes all schools within 1.5 miles of the alignment. This might exclude some Santa Monica schools, so we are requesting all students be provided with full range of age-appropriate programs.

According to Ms. Burns, Metro begins with education programs one full year in advance of the start of service and continues to provide them once or twice a year for all schools. In addition, Metro offers system-specific videos and walking trips which assure that students are familiar with the specific crossings in their area. The training covers the correct behavior for pedestrians, cyclists and motorists at rail crossings. In addition, there are programs which allow students and

teachers to take short field trips on transit to learn transit user skills as well. We would like to express our strong support for this safety education and our desire that all students in Santa Monica participate. In addition, due to the growing number of student cyclists, we request Metro provide bicycle safety training in advance of the specialized rail crossing safety training. By assuring our students know the rules of the road for cycling and the specific safety procedures for crossing the rail line, we can provide them with the tools to understand the hazards involved in both cycling and rail transit and use both transportation modes more safely.

BEACH AND HOLIDAY PEAK PERIOD TRAFFIC AND PARKING IMPACTS

The calculation of potential Expo-related traffic and parking impacts on the Colorado and Fourth station area includes typical commute related peak periods, but completely disregards the extremely high levels of tourist and holiday shopping and entertainment activity in Santa Monica. The calculation risks seriously underestimating the amount of traffic congestion, pedestrian volumes, parking and bicycle activity that might be created at this station.

We request that in addition to the analysis in the DEIR, additional analysis of summer weekend peak traffic and pre-Christmas holiday shopping and entertainment demands be included. Both of these periods are likely to bring the Expo ridership to capacity, while simultaneously filling parking garages and attracting record numbers of motorists. A similar analysis is needed at the 17th Street Station to manage SMC students plus hospital and other employment related demand. This capacity analysis will be important to design the stations, parking facilities, transit, pedestrian and bicycle facilities to accommodate true peak demand as well as daily commute trips.

IMPORTANCE OF PARKING MANAGEMENT AND MULTI-MODAL TRANSFER AT STATIONS

Realizing the full potential of the Expo line to reduce traffic congestion will require careful parking management and provision of convenient and safe bicycle, pedestrian and bus transfer facilities at each station. If large numbers of people drive to the stations to "park and ride" rather than walk, bike, take the bus or carpool, substantial negative impacts to traffic congestion, pedestrian and bicycle safety and parking supply will occur at all three Santa Monica stations. The FEIR should discuss essential features needed to minimize auto trip generation at stations and identify development of Transportation Demand Management programs as a mitigation measure for potential parking and traffic congestion impacts at all stations.

Parking Needs at Stations:

City of Santa Monica staff is currently undertaking a comprehensive analysis of parking for the downtown area and the parking assumptions and needs at the other two stations through station area planning efforts. City Staff will provide recommendations to City Council before the Expo Authority has established parking recommendations as part of the "Final" project.

The DEIR includes 225-250 surface park-and-ride spaces on the City's Sears Automotive site. A more efficient and environmentally sound strategy for Downtown would be shared use of the combined pool of parking for the Downtown and Civic Center Area. Among the possibilities for shared parking use are up to 490 spaces to be provided in a proposed new garage under a new football field on the Santa Monica High School campus near Olympic and 5th Street, and possibly some parking as part of a transit-oriented development (TOD) at the station.

Currently the DEIR assumes approximately 70 spaces at the 17th Street Station for the Colorado alignment and no spaces at the Bergamot Station. The District is concerned that the parking provided is inadequate to the potential demand, and that the surrounding streets are likely to be impacted by overflow parking.

Parking Charges at Stations:

Metro, the future rail operator, should seek a waiver or revision to the current policy of providing park-and-ride spaces free of charge. Free parking will encourage people to drive to the stations and increase auto traffic near the stations. Pricing for City of Santa Monica-owned spaces would be determined by the City, and would be part of an integrated parking management strategy. To encourage patrons to access stations through alternative means, Santa Monica intends to serve the stations through enhanced Big Blue Bus community transit service, bicycle and pedestrian amenities. Station area planning will also explore the accommodation of "kiss-and-ride" drop-off locations.

DOWNTOWN STATION AREA PLANNING

The **Downtown station at Colorado and 4th Station** should be designed to provide convenient transfers to Big Blue Bus and Metro buses to local schools, with adequate bicycle parking, a Bike Station for bike rental and repair, and direct connections to safe bicycle routes through the downtown area. **Bicycle safety improvements** such as bicycle routes or lanes on Fourth Street and connections to bicycle routes in the downtown station area can reduce the traffic safety hazards of increased station area traffic. Special effort is needed to address the significant hazards cyclists and pedestrian face at Colorado and Fourth Street due to heavy automobile traffic and limited routes across the I-10 freeway. Station design might include bicycle access from 5th Street as well. Rebuilding of a former bicycle/pedestrian bridge over the I-10 at 7th Street has been proposed to facilitate N-S access for cyclists, and Expo plans should not preclude implementation of this project, which would provide a safe route directly into the Samohi campus.

Santa Monica High is currently working with City of Santa Monica staff to identify potential pedestrian and bicycle safety improvements around the school. The school has high rate of walking (20%), biking (5%) and bus use (50%) by students to get to and from school, and is working to increase these rates. **Pedestrian crossing improvements** could be implemented with Expo construction as mitigations to potential Expo impacts on pedestrian and bicycle safety. Potential improvement areas include 4th and Colorado and 4th Street at the WB I-10 exit ramp to 4th Street and EB I-10 on-ramp and Olympic Boulevard. Improvements such as median refuges, curb extensions, count-down crossing signals, improved lighting, flashing pedestrian crossing signals and other measures should be considered, given the anticipated increase in pedestrian use and in traffic to the station due to the Expo station at 4th and Colorado.

17th STREET + COLORADO STATION

The **Colorado and 17th Street Station** as proposed will restrict access and exiting from Colorado to the District office entrance at 1651 16th Street, between Colorado and Olympic. The exit from 16th Street eastbound may be restricted by congestion from loading for shuttles serving SMC and nearby hospitals. The 70 spaces at this location will need to be managed in coordination with nearby parking to avoid exacerbating existing parking shortage in the area.

The 17th Street Station, through it is not located a major employment center, will experience very heavy use by Santa Monica College's 30,000 students and 24 hour use by shift employees of the both UCLA - Santa Monica and Saint John's Hospitals and affiliated medical offices. It is imperative that Expo work closely with the City of Santa Monica, Big Blue Bus and nearby uses such as the School District, SMC and hospitals to assure that this station functions smoothly and safely using primarily shuttle, bicycle and pedestrian access without immobilizing traffic. Given the late night and early morning hospital worker use, station design may need to include lighted weather protected areas and perhaps a police substation.

The 17th Street station, along with the 4th and Colorado Station, would be great locations for **secure bike parking, low cost bike rental, and minor repair services**. The 17th Street location in particular offers great bike potential, with the heavy use by SMC students, students at the two middle schools, and Memorial Park based youth programs.

Currently, 17th Street provides one of very few north-south streets with bicycle lanes in the City. It is clear that with the increased shuttle and auto traffic expected with the new station, it will be important to develop **additional bicycle lanes on 14th Street and 20th Street** to serve cyclists not specifically headed for the station.

26th + OLYMPIC STATION

The 26th and Olympic Station plans are very poorly developed, with no vehicular access or drop off identified, very limited opportunities for safe bus loading or transfers, and very poor pedestrian and bicycle access. Some major pedestrian safety improvements are needed to address the difficulties for pedestrians to approach the station. The intersection at 26th and Olympic is very difficult for pedestrians to cross, with several left turn lanes and long crossing distances. **Several segments of the sidewalk system are completely missing on the south side of Olympic**,

This station would potentially serve students, parents and teachers at Edison Elementary School and Grant Elementary School as well as at McKinley and Franklin Elementary Schools. Edison, due to its Spanish immersion program, has a number of students who live east of Santa Monica in Los Angeles. The station location does not provide any convenient way for parents and students arriving by light rail to take the bus or walk from the station to the school, located between Stewart and Cloverfield on Kansas, without walking along Cloverfield, past the dump and freeway on and off ramps.

Bicycle access to the 26th and Olympic Station is even more difficult, as there are narrow right hand lanes with no bike lanes on either 26th or Olympic. One interesting possibility is to extend a pedestrian and bikeway extending from Michigan Avenue through a "tunnel" or partial removal of the rear of an existing building to link through to Stewart Street. This would provide access for pedestrians and cyclists to Edison Elementary and to the SMC parking lot. Additional improvements may be needed to assure safe pedestrian and bicycle crossing at Stewart and Olympic, especially with the hazard of additional trains if the maintenance yard is located there.

Shuttle and bus transfers at the 26th and Olympic Station will be very difficult to accommodate without using a large portion of Bergamot Station, which will also be needed to accommodate some form of vehicular drop off area, especially given the proposed lack of parking. There is currently no transit on 26th Street; however clearly at least a **Mini-Blue bus shuttle** would be needed to connect the station to the schools and destinations accessible via 26th Street as far as San Vicente to the North and along Cloverfield to Ocean Park Boulevard on the south.

Without significant improvements to provide viable bus transfer facilities, safer bicycle and pedestrian access, and some parking and drop off areas, **this station may be underutilized** despite many potential nearby users just beyond walking distance of the station. Due to its isolated location and proximity to the recycling center and a homeless services center, it will be important to provide **activity and security at the station** to attract other patrons, particularly in early morning and evening hours. This station requires intensive additional study by Expo, the City, SMC and other stakeholders such as the Watergarden and Arboretum to resolve multiple access and safety challenges.

Expo Bikeway Exclusion from Light Rail Project: We are concerned that in order to avoid the cost and delay of NEPA compliance for the light rail project, the accompanying bikeway paralleling the line has been taken out of the project and the DEIR. The bikeway provides an effective mitigation measure for the increased traffic generated at stations, as the bikeway and its connections to the larger bicycle network are integral to providing quiet, green and healthy access to stations without the noise, parking and congestion of transit or autos.

Funding and Leadership for Bikeway Environmental Clearance: We urge the Expo Authority, Metro Board and the Cities of Santa Monica, Culver City and Los Angeles to act promptly to identify the funding and lead agency for integrated NEPA/CEQA compliance for the bikeway project. If this effort is initiated soon, it should be possible to complete the bikeway environmental clearance while Expo CEQA clearance is occurring, avoiding delay to either project.

The bikeway design and NEPA/CEQA review process should utilize previous studies where possible and be certified in time to be designed and constructed along with the light rail project. Samantha Bricker, Expo COO, has confirmed that the special studies that Expo completed when they were anticipating doing NEPA clearance prior to passage of Measure R could be made available to the cities to assist in their environmental clearance work. At recent Expo public meetings we were told it is the goal of Rick Thorpe, Expo CEO, to have one contract that includes both the LRT and bikeway construction. We understand that Mr. Thorpe has given direction to coordinate with the cities on the bikeway design and to allocate funding for this coordination.

Metro, Expo and the Cities of Santa Monica, Los Angeles and Culver City should work to address several design problems with the proposed bikeway route. The bikeway route should be designed to avoid detours at the proposed maintenance vard, ideally by relocating the maintenance vard to another location away from residential areas, or by providing a more direct route for cyclists on the Olympic side of the property. Options for revising the Expo Bike path alignment require further study by City of Santa Monica and Expo staff because the proposed maintenance vard and the narrow right-of-way between Stewart and 26th Streets prevent a Class I pathway from remaining on the ROW. Marked bike lanes or a separate bikeway should be provided to avoid unprotected mixed flow of cyclists with the heavy, high speed vehicular traffic on Olympic. Expo Authority staff has indicated that they would consider evaluating a Bergamot Station design variation with a split platform (rather than center platform) to narrow the track configuration and potentially create enough space to accommodate the bike path between Stewart and 26th Streets. The Expo Authority has also suggested that the City could bring a pathway through the Cityowned Bergamot property if the Bergamot site is redeveloped. While the bike path could leave the rightof-way at Stewart Street and proceed with a Class II bike lane on Stewart Street northward to connect with the Broadway bike lane, this option would not provide bike access to the station. We welcome City of Santa Monica plans to hold a Community Transportation Workshop this spring so the bike path routing options can be addressed along with station access and facilities for bicycles.

Potentially hazardous crossings of the bike route shown in the DEIR where the bikeway crosses major intersections, including Pico-Gateway and Cloverfield-Olympic, require further study of a range of options. Alternatives for grade separated crossings, especially at Sawtelle and Pico and perhaps Cloverfield, should be considered by the Cities in close consultation with Expo to evaluate designs and costs in order to facilitate final design and construction integration with elevated LRT segments. If the grade separated bikeway crossing options are not deemed feasible or desirable, alternatives which might include special signalization and intersection design to facilitate bicycle crossings should be considered along with other design features to integrate road marking and signage to increase cyclist safety.

SUMMARY

In conclusion, the Santa Monica Malibu Unified School District has reviewed the DEIR document and strongly supports construction of the Expo project with the Colorado alignment. We have significant concerns about the adequacy of the DEIR analysis and proposed mitigation measures for potential traffic and parking impacts and pedestrian and bicycle safety hazards, particularly for school age children traveling unaccompanied on foot, bike or transit to school, home or after-school activities.

To respond to these concerns, we urge that additional mitigation measures and design features be included in station area planning to address the following potential impacts:

- 1) Safety of school age children at crossings and stations, and convenient and safe pedestrian access to protect from hazards from Light Rail Vehicles, buses and vehicles in station areas. Mitigation should include bicycle and rail transit safety education in all Santa Monica schools.
- 2) Convenient and safe bicycle route connections, including Expo and Metro assistance to assure completion of design and environmental review for the Expo bikeway and constructing connections from all stations to a larger bicycle route network.
- 3) Close coordination with Big Blue Bus, SMMUSD and other major employers to provide frequent, convenient bus or shuttle connections to reduce auto travel generation at all stations. Mitigations should include designated transit transfer areas and service developed in coordination with the above parties, including Santa Monica College, the District, and the hospitals.
- 4) Coordinated management of parking in the station areas to support use of sustainable transportation options including walking, biking, buses, carpools and kiss and ride. Development of an efficient management plan for Metro, public and shared parking areas to avoid impacting existing District facilities and schools in areas with insufficient public and on street parking.
- 5) Close consultation with the SMMUSD during station area design for all three stations given proximity to schools and other District owned facilities, with particularly close consultation at 17th Street and 4th Street stations in view of proximity to District Office, Santa Monica High and District-owned Doubletree hotel.

We appreciate the opportunity to comment and look forward to close consultation with Expo, the City, and SMC to assure that Expo design minimizes potential negative impacts and achieves its full potential to provide sustainable transportation to Santa Monica and the larger region.

Sincerely,

Tim Cuneo, Superintendent of Schools Santa Monica Malibu Unified School District Ralph Mechur, President, SMMUSD Board of Education

Cc: Santa Monica City Council

Planning Commission and Recreation and Park Commission

P. Lamont Ewell, City Manager

Andy Agle, Housing and Economic Development Director

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Ellen Gelbard, Assistant Director, PCD

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Barbara Stinchfield, Director, Community and Cultural Services

Karen Ginsberg, Assistant Director, CCS

Elizabeth Stearns, PTSA President

Stephen Saks, Measure BB Committee Co-Chair, PTSA

Don Girard, Santa Monica College Monica Born, Expo Authority

Barbara Burns, Metro Safety Programs

Lynn Goldsmith, Metro Bicycle Programs