



Exposition Metro Line
Construction Authority

707 Wilshire Boulevard
34th Floor
Los Angeles, CA 90017

(9/23/14) Board Meeting
A-2259
Deadline: 9/15/14 by 12:00 noon
213.243.5500
BuildExpo.org

Expo

September 3, 2014

EXPO2 02068
CA 112

Ms. Jeanine Townsend
Clerk to the Board
State Water Resources Control Board
1001 I Street, 24th Floor
Post Office Box 100
Sacramento, CA 92814



Via E Mail: commentletters@waterboard.ca.gov

Re: Comments on A-2259; - September 23, 2014 Board Meeting. Petition of Foothill/Eastern Transportation Corridor Agency -- Waste Discharge Requirements Tentative Order No. R-9-2013-0007 – Tesoro Extension Project – State Route 241

Dear Ms. Townsend:

The Exposition Metro Line Construction Authority (“Expo Authority”) submits the following comments on the Draft Order in the above-referenced matter. The Expo Authority is the public agency responsible for designing and building the Expo Corridor 15-mile light rail transit line from downtown Los Angeles to Santa Monica. As is the case with most complex transportation projects, the Expo Line is being designed, permitted and built in phases. The first phase of the Expo project (from downtown L.A. to Culver City) opened in 2012. The second phase (from Culver City to Santa Monica) is under construction.

We request that the State Board modify the report accompanying the Draft Order to make it clear that regional boards should limit their review of proposed Waste Discharge Requirements (WDRs) and water quality certifications to the scope of the transportation improvement and discharge proposed by the transportation agency.

The State Water Board draft order in the above matter indicates that regional water boards may require transportation agencies to obtain water board review and approval of discharges associated with future phases of a transportation improvement at the time of the initial phase – even in circumstances where the future phase is not funded and may not be built for many years. This interpretation is contrary to the existing practice of transportation permitting agencies in Los Angeles County. If adopted, the interpretation reflected in the Draft Order will adversely impact the timely and cost-effective delivery of important transportation improvements.

Ms. Jeanine Townsend
State Water Resources Control Board
September 3, 2014
Page 2

The Expo Line is a classic example of why it is necessary that transportation agencies retain the flexibility to permit and construct major transportation improvements in phases. The Expo Line was originally conceived over twenty years ago as a single project between downtown Los Angeles and Santa Monica. Because of funding limitations and continuing public controversy over alignment and other issues on the western end of the project (e.g. from Culver City to Santa Monica), the Los Angeles County Metropolitan Transportation Authority (Metro) decided that the project should be permitted and built in phases. In 2005, Metro approved Phase 1 (from Downtown to Culver City), but deferred the consideration of Phase 2 until a later date. This decision allowed the Phase 1 light rail transit line to be completed and opened for service while the Expo Authority worked to resolve a complex array of environmental and community issues in Phase 2. The Expo Authority spent the next five years working to resolve Phase 2 issues and in February 2010 approved an alignment and project design for Phase 2. The experience on Expo Project demonstrates that it is essential that transportation agencies retain the flexibility to phase the permitting and construction of major new transportation improvements.

Sincerely,



Samantha Bricker
Chief Operating Officer

cc: Rob Thornton
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