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**BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA**

In the Matter of the Application of the Los Angeles County Metropolitan Transportation Authority for an order authorizing the construction of two-track, at-grade crossing for the Crenshaw/LAX Transit Corridor Project Light Rail Line across West 59th Street, Slauson Avenue, West 57th Street, West 54th Street, West 52nd Street, West 50th Street and across West 48th Street in the City of Los Angeles.

Application 13-01-012
(Filed March January 23, 2013)

PETITIONER CHANDRA V. MOSLEY REPLY TO THE LOS ANGELES COUNTY METROPOLITAN TRANSPORTATION AUTHORITY'S (LACMTA) OPENING BRIEF AS RULED BY ADMINISTRATIVE LAW JUDGE (ALJ) W. ANTHONY COLBERT OR "COMMISSION" TO APPROVE THE PETITIONER'S PETITION FOR MODIFICATION OF DECISION 14-08-045

Chandra V. Mosley
Individual
4113 W. 59th Street, Los Angeles CA 90043
Tel: (323) 823-4566
E-mail: Bareessence24@hotmail.com

August 15, 2016

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OF THE STATE OF CALIFORNIA**

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Application 13-011-012
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Reply to LACMTA’S Opening Brief

It is this Petitioner’s submission that LACMTA’s Opening Brief continue to deny the fact that LACMTA did not provide sufficient outreach to the Park Mesa Heights Community. LACMTA contends that their distribution of “flyers” and “mailers” within a quarter mile of the project were sufficient enough to notify impacted stakeholders of their plan to design a light rail line at grade level along Crenshaw Boulevard between 48th Street and 59th Place. LACMTA inserts that their selected newspaper publications, which were outside of the Park Mesa Heights Community with the exception of one weekly publication support their

outreach efforts and again was sufficient enough for this Petitioner to have known to submit an opposition to the Commission.

It is also this Petitioner's submission that LACMTA continues to ignore facts that LACMTA did not use their Grade Crossing Safety Policy, adopted on September 23, 2010, to ensure that the Park Mesa Heights Community and safety concerns were equally aligned to their design analysis. Instead LACMTA ignored all safety requirements outlined in their Policy and without regard to the high dense community that is also highly populated with schools and seniors is knowingly trying to fast track this "project" and ignore their responsibility to the community's safety as noted in their Grade Crossing Safety Policy where ample justifications for grade separations at each intersection has been provided.

Furthermore, instead of LACMTA accepting their mistakes that has caused stated high cost to their "project" they continue to attempt to justify why these concerns should not be brought to the attention of the "Commission" for the appropriate modifications to ensure the safety of the community as prescribed.

It is this Petitioner's submission that throughout this process countless evidence has been revealed through submitted attachments and LACMTA's testimony admitting that only phases of the "project" design was revealed to the community and that only a quarter mile radius of flyers and mailers were disseminated to the stakeholders. It has been further revealed through LACMTA's own testimony that they did not refer to the own Grade Crossing Safety Policy in their evaluations and decision process to ensure that the impact to the Park Mesa Heights Community would not incur safety hazards or risks to its community members or would have future negative ramifications.

LACMTA's Opening Briefs also begins with the citation of Section 1708 to Rule 16.4 to suggest that the "Commission" should strictly adhere to a policy to avoid the discovery of blatant disregard to safety policy provisions by their own organization that should have been recognized in the initial phases of this project. LACMTA has also referenced several projects that were approved and completed however, these projects do not have the same sensitive characteristics of the Park Mesa Heights Community and it is not uncertain if these projects were completed prior to LACMTA's new policy.

Finally, this Petitioner was very transparent in the August 5, 2016 Brief where greater detail was provided on how this "project" has personally caused anguish due to the egregious disregard for others to sustain highly probable suffering due to the neglect of others. It is unspeakable to know that this "project" leans no creditable value to our community but instead will bring high risk to the over 2,750 school aged children and countless senior who travel this route daily. Daily suffering and complications due to preventable injuries sustained by the negligence of an organization that knew better support this Petitioner's anguish.

Over the past several months throughout this process this Petitioner has suffered personally on an array of medical levels to speak on behalf of this community. It is insulting to read opinion that this subject matter is "unpersuasive" when the very issue of injury "safety" for others is "absolutely persuasive" and is part of the responsibility of all parties involved. It is also insulting that LACMTA has stated that this "project" would be an economical betterment to the Park Mesa Heights community when the only locations to either exit or enter the rail line is an eleven block stretch between Leimert Park and 59th Place which is adjacent to apartments, a gas station, a smoke shop, a donut shop, check cashing and a grocery store. Several community members as well as this Petitioner believes that the

implication that this “project” would enhance our community is beyond outrageous as we all can easily anticipate the opposite occurring to include increased crime with an easier outlet for criminal behavior to occur undetected.

This Petitioner has submitted substantial information that refutes all claims submitted by LACMTA including their own testimony and admissions referenced in this Petitioner’s Brief. Again, it is humbly requested that the ALJ W. Anthony Colbert take full advantage of the information provided from this Petitioner’s first submission to this final reply in order that Your Honor make a recommendation that is conscionable based on the truth of the matter and the facts of this matter.

Dated: August 15, 2016

Respectfully submitted,

/Chandra V. Mosley/

Chandra V. Mosley

Retired City of Los Angeles Employee]

Individual

Tel: (323) 823-4566

E-mail: Bareessence24@hontial.com