



**U.S. Department
of Transportation**
**Federal Transit
Administration**

REGION IX
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American Samoa,
Northern Mariana Islands

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August 23, 2024

Ms. Stephanie Wiggins
Chief Executive Officer
Los Angeles County Metropolitan Transportation Authority
1 Gateway Plaza
Los Angeles, CA 90012

**Re: Record of Decision for West Santa Ana Branch
Transit Corridor Project (Southeast Gateway Line)**

Dear Ms. Wiggins:

The Federal Transit Administration (FTA) has completed its review of the public and agency comments on the Final Environmental Impact Statement/Final Environmental Impact Report (Final EIS/EIR) for the West Santa Ana Branch Transit Corridor Project (Project), which has been renamed as the Southeast Gateway Line. In compliance with the National Environmental Policy Act (NEPA), the FTA has issued the enclosed Record of Decision (ROD) for the Project. As stated in the ROD, the Project must incorporate all the mitigation measures of adverse effects presented in the Final EIS and the ROD. These mitigation actions include, but are not limited to, all commitments for further consultation on specific issues.

If the Los Angeles County Metropolitan Transportation Authority (LACMTA) contemplates any change to the Project, LACMTA must notify FTA immediately and refrain from taking any action related to the proposed change until FTA has determined what, if any, additional environmental analysis is necessary, and that analysis has been completed and approved by FTA. For example, if LACMTA wishes to make a change to the mitigation measures in the Final EIS, the ROD, or a change to the Project that would cause new or changed environmental or community impacts not presented in the Final EIS, then LACMTA must notify FTA in writing of the desire to make a change.

Any such change will be reviewed in accordance with FTA environmental procedures (23 C.F.R. §771.129 and §771.130) on re-evaluations and supplemental documentation. The FTA will determine the appropriate level of environmental review for this or any other proposed change (i.e., a written re-evaluation of the Final EIS, an environmental assessment of the change, or a supplemental EIS), and the NEPA process for this supplemental environmental review will conclude with a separate NEPA determination or, if necessary, with an amendment to this ROD.

Upon FTA's issuance of the ROD, LACMTA is authorized to take the following Project actions without prejudice to FTA's future financial assistance for these actions:

- incur costs for as much engineering and design as needed to develop a reasonable cost estimate and financial plan for the project,
- utility relocation,
- real property acquisition and associated relocations for any property acquisitions not already accomplished as a separate project for hardship or protective purposes

This pre-award authority is not a real or implied commitment by FTA to provide any funding for the Project or any element of the Project. However, if FTA were to provide grant funding for the Project, the cost of the actions listed above, performed after the ROD issuance, would be eligible expenses. No other Project action has pre-award authority at this time. To maintain the Project's eligibility for Federal assistance, all real property acquisitions, and the relocation of persons and businesses thereon, must be conducted in accordance with the Uniform Relocation Assistance and Real Property Acquisition Policies Act and its implementing regulation (49 C.F.R. Part 24) and any other applicable Federal law or regulation.

Please make the ROD and supporting documentation available to affected government agencies and the public. Availability of the ROD should be published in local newspapers and should be posted on the Project website. The ROD also should be provided directly to affected government agencies, including the State Inter-governmental Review contact established under Executive Order 12372.

We look forward to continuing to work with you to bring this important Project to fruition. Should you have any questions, please contact Mr. Rusty Whisman, Senior Transportation Program Specialist, at rusty.whisman@dot.gov or (213) 202-3956.

Sincerely,



Ray Tellis
Regional Administrator

Enclosure:

- Record of Decision for the West Santa Ana Branch Transit Corridor Project

**RECORD OF DECISION
FOR THE
LOS ANGELES COUNTY METROPOLITAN TRANSPORTATION AUTHORITY
WEST SANTA ANA BRANCH TRANSIT CORRIDOR PROJECT,
LOS ANGELES COUNTY, CALIFORNIA
BY THE
FEDERAL TRANSIT ADMINISTRATION**

Decision

The Federal Transit Administration (FTA), pursuant to Title 23 of the Code of Federal Regulations (CFR) Part 771 and Title 40 CFR Parts 1500-1508, has determined that the requirements of the National Environmental Policy Act (NEPA) of 1969 and related federal environmental statutes, regulations, and executive orders have been satisfied for the Los Angeles County Metropolitan Transportation Authority's (LACMTA) West Santa Ana Branch (WSAB) Transit Corridor Project (Project) located in Los Angeles County, California.

This Record of Decision (ROD) applies to the proposed light rail transit (LRT) system evaluated in the *West Santa Ana Branch Transit Corridor Project Final Environmental Impact Statement/Final Environmental Impact Report* (EIS/EIR), dated March 2024. The FTA is the Lead Agency under NEPA, and LACMTA served as the Lead Agency under the California Environmental Quality Act (CEQA). Cooperating Agencies include the U.S. Army Corps of Engineers (USACE) and the California Department of Transportation (Caltrans). The Project was renamed the Southeast Gateway Line on January 22, 2024. Although the Project was renamed, the ROD refers to WSAB for consistency with the nomenclature in the Final EIS/EIR.

Alternative 3 was identified as the Locally Preferred Alternative (LPA). It involves the construction and operation of a new LRT line that will extend from a northern terminus in the City of Los Angeles/Florence-Firestone unincorporated area of Los Angeles County to a southern terminus in the City of Artesia, traversing densely populated and heavily transit-dependent communities. Specifically, the LPA will traverse through or be directly adjacent to the Cities of Los Angeles, Vernon, Huntington Park, Bell, Cudahy, South Gate, Downey, Paramount, Bellflower, Cerritos, and Artesia, as well as the unincorporated community of Florence-Firestone of Los Angeles County. The LPA includes the design, construction, and operation of approximately 12.1 at-grade track miles and 2.4 aerial track miles for a total of 14.5 miles. The LPA also includes nine (9) LRT stations along the alignment, one (1) infill station on the C Line, five (5) parking facilities totaling approximately 2,800 parking spaces, and a maintenance and storage facility (MSF) located in the City of Bellflower. Additional details related to LPA components, including ancillary facilities, are further described in this ROD.

LACMTA will seek financial assistance from the FTA to complete engineering and construction of the LPA. If awarded federal funding, FTA will require that LACMTA design and construct the LPA as described in the Final EIS/EIR and in this ROD. Any proposed changes by LACMTA must be evaluated in accordance with 23 CFR Section 771.129-130 and FTA must approve the changes before LACMTA can proceed.

Background

Located in southeastern Los Angeles County, the Study Area is approximately 98 square miles and incorporates 20 individual cities: the Cities of Los Angeles, Vernon, Maywood, Huntington Park, Commerce, Bell, Cudahy, Bell Gardens, South Gate, Lynwood, Compton, Downey, Paramount, Bellflower, Long Beach, Lakewood, Norwalk, Artesia, Cerritos, and Hawaiian Gardens, as well as portions of unincorporated Los Angeles County.

The Project's Purpose is to provide high-quality reliable transit service to meet the future mobility needs of residents, employees, and visitors who travel within and through the Study Area. This new transit service will increase mobility and connectivity for historically underserved and transit-dependent communities, improve travel times on local and regional transportation networks, and accommodate substantial future employment and population growth.

More specifically, the Project's Purpose is as follows:

- Establish a reliable transit service that will enhance the connectivity of the existing transit network and reduce transit travel times to local and regional destinations
- Accommodate future travel demand, including the high number of transit trips made by Study Area residents
- Improve access for the densely populated neighborhoods, major employment centers, and other key regional destinations where future growth is forecasted to occur within the Study Area
- Address mobility and access constraints faced by transit-dependent communities and environmental justice communities

Project Planning

The Southern California Association of Governments (SCAG) initiated project planning efforts in 2010. SCAG issued the *Pacific Electric Right-of-Way (PEROW)/West Santa Ana Branch Corridor Alternatives Analysis Report* in 2012, which collected screening studies examining the feasibility of implementing various modes and technologies and exploring opportunities for connecting Los Angeles and Orange Counties. The Alternatives Analysis Report recommended a No Build Alternative, a Transportation System Management Alternative, and two (2) LRT alignment alternatives (one (1) on the west side of the Los Angeles River and one (1) on the east side of the river) for further study.

In 2015, LACMTA completed the *West Santa Ana Branch Technical Refinement Study* (Study) to refine the alternatives identified in the Alternatives Analysis Report and considered the feasibility of alignments connecting the PEROW to downtown Los Angeles given constraints and opportunities within the northern segment. The Study recommended elimination of the rail alignment on the east side of the Los Angeles River due to right-of-way constraints and low ridership. The Study recommended further analysis of four (4) light rail alignments on the west side of the river; two (2) optional platform locations for the Los Angeles Union Station (LAUS) terminus; and new stations in the Arts District, the C (Green) Line Station, and the Pioneer Station.

In 2017, the *West Santa Ana Branch Transit Corridor Northern Alignment Options Screening Report* evaluated four (4) potential rail alignments with a terminus at LAUS and recommended the four (4) alignments be carried forward into the environmental scoping process.

LACMTA issued a Notice of Preparation on May 25, 2017, pursuant to CEQA. The FTA initiated the EIS process for the Project by publishing a Notice of Intent (NOI) in the Federal Register on June 26, 2017. The NOI provided scoping meeting information, contact information, and project information. Scoping meetings included a description of the Project, goals and objectives, the Study Area, and the environmental impacts to be evaluated in the Draft EIS/EIR.

In 2017, the *West Santa Ana Branch Transit Corridor Preliminary Assessment Report of Rail Maintenance Yard Sites* was completed to identify MSF site options. The assessment evaluated 21 potential locations. Two (2) MSF site options (Paramount and Bellflower MSF site options) were selected for inclusion in the Draft EIS/EIR based on their provision of mobility improvements, minimization of environmental impacts, financial feasibility, equity, and preliminary engineering design.

In response to public scoping comments in 2017, the northern alignment options were revisited in the *West Santa Ana Branch Transit Corridor Northern Alignment Alternatives and Concepts Updated Screening Report*, completed in April 2018. The update included additional connection options in downtown Los Angeles and a rail alignment to serve the Arts District. In May 2018, the LACMTA Board of Directors authorized two (2) alternatives from the screening report, Alternative E and Alternative G to be carried forward as Build Alternatives 1 and 2, respectively, in the Draft EIS/EIR. Alternatives E and G were recommended based on their high ratings in meeting the Project's goals. Comments received during outreach in support of the report in March 2018 also expressed a preference for Alternatives E and G. Six (6) alternatives were withdrawn from further consideration for technical feasibility and operational reasons.

The 2019 *Revised Final Evaluation of Minimum Operable Segment Report* identified and evaluated five (5) potential options to determine cost-effective solutions with the greatest benefits for the Project. A minimum operable segment (MOS), referred to as an initial operating segment in a September 2019 LACMTA Board Report, is a segment of a project alignment that can function as a standalone project and not be dependent on other segments or phases to be constructed. The MOS Report recommended MOS 1: I-105/C Line Station to Pioneer Station and MOS 3: Slauson/A Line Station to Pioneer Station to be evaluated in the Draft EIS/EIR as Alternatives 4 and 3, respectively.

Alternatives Considered in the Draft EIS/EIR

The Draft EIS/EIR described and evaluated a No Build Alternative, four (4) Build Alternatives, two (2) design options, and two (2) MSF site options.

No Build Alternative. The No Build Alternative provides the background transportation network against which the Build Alternatives were evaluated under NEPA. The No Build Alternative reflects the reasonably foreseeable transportation network in 2042 excluding the Project while including the existing transportation network and planned transportation improvements that have been committed to and identified in the constrained LACMTA 2009 *Long Range Transportation*

Plan and SCAG 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS), as well as additional projects funded by Measure M, a sales tax initiative approved by voters in November 2016.

Alternative 1. Alternative 1 was defined as a 19.3-mile alignment with a northern terminus located underground at LAUS Forecourt in the City of Los Angeles and a southern terminus located at Pioneer Station in the City of Artesia. Alternative 1 included 11 LRT stations with five (5) having parking facilities totaling approximately 2,780 spaces, and an infill station along the C (Green) Line.

Alternative 1 included two (2) design options. *Design Option 1* (Los Angeles Union Station – Metropolitan Water District [MWD]) commenced with the tail tracks near the California Endowment Building, followed by an underground station located east of the existing MWD building and below the LAUS passenger concourse. *Design Option 2* (Addition of Little Tokyo Station) included an underground Little Tokyo Station between the LAUS and Arts/Industrial District Stations that was proposed to be located beneath Alameda Street between 1st Street and 2nd Street and designed to allow at-grade transfers to the Regional Connector Little Tokyo/Arts District Station.

Alternative 2. Alternative 2 was defined as a 19.3-mile alignment with a northern terminus at a new 7th Street/Metro Center Station located underground at 8th Street between Figueroa and Flower Streets near the existing 7th Street/Metro Center Station. The southern terminus was proposed at Pioneer Station in the City of Artesia. Alternative 2 included 12 LRT stations with five (5) having parking facilities totaling approximately 2,780 spaces and an infill station along the C (Green) Line.

Alternative 3. Alternative 3 was defined as a 14.8-mile alignment¹ with a northern terminus at the Slauson/A Line Station in the City of Los Angeles/Florence-Firestone unincorporated area of Los Angeles County and a southern terminus located at the Pioneer Station in the City of Artesia. Alternative 3 included nine (9) LRT stations with five (5) parking facilities totaling approximately 2,780 spaces and an infill station along the C (Green) Line.

Alternative 4. Alternative 4 was defined as a 6.6-mile alignment with a northern terminus at the I-105/C Line Station in the City of South Gate and a southern terminus at the Pioneer Station in the City of Artesia. Alternative 4 included four (4) LRT stations, each with parking facilities totaling approximately 2,180 spaces and an infill station along the C (Green) Line.

MSF Site Options. Two (2) MSF site options were evaluated in the Draft EIS/EIR, referred to as the Paramount and Bellflower MSF site options. The Paramount MSF was proposed to be located on a 22-acre site in the City of Paramount. Lead tracks were designed to enter the site along its western edge, approximately 0.3 mile south of the LRT mainline track. The Bellflower MSF was proposed to be located on a 21-acre site in the City of Bellflower. Lead tracks were designed to enter the site from the LRT tracks constructed within the adjacent LACMTA-owned PEROW.

¹The length of Alternative 3 in the Draft EIS/EIR was incorrectly presented as 14.8 miles; the correct length is 14.5 miles.

Draft EIS/EIR Circulation and LPA Identification

The Notice of Availability of the Draft EIS/EIR was published in the Federal Register on July 30, 2021. During the 60-day public review between July 30, 2021, and September 28, 2021, LACMTA hosted four (4) virtual public hearings, four (4) virtual community information sessions, and over 19 pop-up booths for in-person engagement. In addition, LACMTA held approximately 20 briefings for key stakeholders, elected officials, corridor cities, and other public agencies. In total, 452 formal comment submissions (e.g., comment cards, emails, and letters) were received that addressed a variety of topics related to the Draft EIS/EIR.

In January 2022, the LACMTA Board of Directors identified Alternative 3 with the City of Bellflower MSF site option as the LPA. The LPA evaluated in the Final EIS/EIR included design refinements to address stakeholder coordination and public comments received since circulation of the Draft EIS/EIR. The LPA is described further below.

Post-Draft EIS/EIR Circulation

Subsequent to the Draft EIS/EIR circulation and identification of the LPA, LACMTA continued to coordinate with stakeholders, including the California Public Utilities Commission, Caltrans, the USACE, the State Historic Preservation Officer, the Ports of Los Angeles and Long Beach in conjunction with the Union Pacific Railroad (UPRR), and corridor cities. In consideration of comments received on the Draft EIS/EIR and comments received from stakeholders, LACMTA conducted additional studies and looked at possible refinements to the LPA.

In response to comments, LACMTA completed the *West Santa Ana Branch Transit Corridor Cut-and-Cover Analysis Memorandum* in December 2022 that assessed sections of the LPA that were in an aerial configuration to determine if a cut-and-cover alignment could be constructed at a lower cost than the aerial alignment. The Study concluded that cut-and-cover methods would conflict with existing major utility networks and existing freight rail, and would increase costs compared to the Draft EIS/EIR design. Based on consideration of the Study's findings, LACMTA staff determined that a cut-and-cover alignment is not a feasible alternative for the LPA, and, therefore, a cut-and-cover alignment was not included in the Final EIS/EIR.

Commentors suggested updating the growth forecasts using the SCAG 2020-2045 RTP/SCS, which was adopted by SCAG on September 3, 2020, after completion of the Draft EIS/EIR modeling and analyses, which used growth forecasts from the SCAG 2016-2040 RTP/SCS as baseline data. In response, LACMTA compared the differences in regional growth forecasts between the SCAG 2016-2040 RTP/SCS and the 2020-2045 RTP/SCS and concluded that the difference in the forecasted growth for 2042 for population, housing, and employment for Los Angeles County and the Study Area is two (2) percent or less. Therefore, the findings would not be substantially different than what was presented in the Draft EIS/EIR, and updated analysis using the 2020-2045 RTP/SCS was not conducted for the Final EIS/EIR.

Commentors requested that additional transit parking be considered at stations with proposed parking or by adding parking at stations that did not have parking facilities. In response, LACMTA completed the *West Santa Ana Branch Transit Corridor Project Revised Transit Parking Study* in March 2024 to determine whether transit stations without parking should

include dedicated transit parking and whether the parking supply was sufficient at the transit parking facilities with proposed parking in the Draft EIS/EIR. The Study concluded that given the sufficient capacity of the proposed parking supply throughout the corridor to accommodate forecasted parking demand for the LPA and the additional acquisitions that would be required for new potential parking sites, the provision of more parking beyond what was proposed in the Draft EIS/EIR was not recommended.

After the release of the Draft EIS/EIR, refinements to the LPA were made in response to comments on the Draft EIS/EIR and through stakeholder coordination. These refinements are documented and assessed in the Final EIS/EIR. The refinements and associated analysis have not identified any new or more severe significant adverse impacts than were identified in the Draft EIS/EIR. The design refinements and additional mitigation would reduce impacts compared to those identified in the Draft EIS/EIR.

Environmentally Preferable Alternative

Per 40 CFR Part 1505.2(b), the FTA is required to identify an “environmentally preferable alternative” that causes the least damage to the biological and physical environment and best protects, preserves, and enhances historical, cultural, and natural resources. The Draft and Final EIS/EIR refers to this as the environmentally superior alternative.

Alternative 3 from the Draft EIS/EIR was identified to have fewer permanent acquisitions, residential and business displacements, noise and vibration impacts, and be in proximity to fewer hazardous materials sites compared to Alternatives 1 and 2. Alternative 3 will also affect access to fewer community facilities, require fewer construction laydown areas, and will not result in exceedances in daily regional air pollutant emissions compared to Alternatives 1 and 2.

Alternative 4 would provide a lower level of environmental benefits than Alternative 3 due to the lack of connectivity and limited benefits achieved with four (4) stations. Overall, Alternative 3 will generate environmental benefits by providing mobility and connectivity to transit-dependent populations in 12 cities throughout the corridor, as well as \$5.1 million (2020\$) in economic activity annually to the region. As such, Alternative 3 was identified as the environmentally superior, or preferable, alternative. The design refinements made to the LPA after circulation of the Draft EIS/EIR do not change this determination.

The No Build Alternative would lack the environmental benefits and transportation benefits of the LPA. This alternative would result in greater traffic congestion in the Study Area resulting in longer travel times. Therefore, in consideration of the damage to the physical environment and the long-term benefits to environmental resources, particularly traffic congestion and associated air pollution emissions, the LPA is environmentally preferable when compared to the No Build Alternative.

LPA Description

The LPA, described as Alternative 3 in the Draft EIS/EIR and as the LPA in the Final EIS/EIR, is the subject of this ROD and is the NEPA preferred alternative. The LPA is an LRT alignment that will extend from a northern terminus in the City of Los Angeles/Florence-Firestone unincorporated area of Los Angeles County to a southern terminus in the City of Artesia

traversing densely populated and heavily transit-dependent communities. The LPA is a 14.5-mile double-track alignment and will include approximately 12.1 miles of at-grade alignment and 2.4 miles of aerial alignment. From Slauson Avenue, the LPA will be within the UPRR-owned La Habra Branch Right-of-Way (ROW) east along Randolph Street. At the Ports-owned San Pedro Subdivision ROW, the LPA will turn southeast to follow the San Pedro Subdivision ROW and then transition to the PEROW south of the I-105 Freeway. The LPA will then be within the LACMTA-owned PEROW to the southern terminus at the Pioneer Station in Artesia.

The aerial segments will be supported by retained fill embankments, columns, or straddle bents. Retained fill embankments will provide transitions between aerial structures and at-grade segments. Typical aerial structures will consist of single-pier columns supporting a dual-track guideway that will be approximately 35 feet wide. Straddle bent columns will consist of two (2) or more columns supporting a beam and the LRT guideway. The beams will typically be located where the LRT track centerlines are widened, such as near stations, or where a single-pier structure will impact existing roadway or railroad tracks. The aerial guideway spanning over the UPRR ROW will have a minimum vertical clearance of 24 feet over freight and a minimum of 15 feet over roadways.

The LPA includes nine (9) LRT stations along the new alignment, one (1) infill station on the C (Green) Line, and five (5) parking facilities totaling approximately 2,800 spaces. The station designs will adhere to the Metro Rail Design Criteria, or equivalent, will be Americans with Disabilities Act-compliant, and will resemble stations on existing lines. The stations are as follows:

- Slauson/A Line Station (aerial) located south of Slauson Avenue at Long Beach Avenue. This station does not include parking.
- Pacific/Randolph Station (at-grade) located at Randolph Street between Pacific Avenue/Seville Avenue. This station does not include parking.
- Florence/Salt Lake Station (at-grade) located at Salt Lake Avenue between Florence Avenue/California Street. This station does not include parking.
- Firestone Station (aerial) located between Atlantic Avenue/Firestone Avenue. This station includes 600 parking spaces.
- Gardendale Station (at-grade) located at Gardendale Street/Dakota Avenue. This station does not include parking.
- I-105/C Line Station (at-grade) located between Century Boulevard and Main Street; I-105 Freeway/C Line (platforms on WSAB and Metro C Line). This station includes up to 360 parking spaces.
- Paramount/Rosecrans Station (aerial) located at Paramount Boulevard/Rosecrans Avenue. This station includes 490 parking spaces.
- Bellflower Station (at-grade) located at Bellflower Boulevard/Pacific Avenue. This station includes 260 parking spaces.
- Pioneer Station (at-grade) located at Pioneer Boulevard/187th Street. This station includes 1,100 parking spaces.
- New infill station on the C (Green) Line where the alignment crosses the I-105 Freeway to facilitate transfers between the LPA and C Line.

Stations will include bike hubs, signage, and safety and security equipment, such as closed-circuit televisions, public announcement systems, passenger assistance telephones, and variable message signs (providing real-time information). The LPA will include bicycle and pedestrian facilities to connect to stations and to provide continuity for existing facilities affected by the LPA.

The LPA includes 30 at-grade crossings, 15 elevated street crossings, six (6) freight crossings, four (4) freeway crossings (three (3) freeway undercrossings and one (1) aerial freeway crossing), and three (3) river crossings. The LPA includes the design option identified in the Final EIS/EIR to close 186th Street but keep 187th Street open to traffic in the City of Artesia. The LPA requires 8.7 miles of freight tracks to be relocated within the Wilmington Branch ROW, La Habra Branch ROW, San Pedro Subdivision ROW, and the LACMTA-owned PEROW. The relocations will accommodate the LPA alignment while maintaining existing freight operations. The LPA will provide a minimum 20-foot clearance between the track centerlines of the closest LRT and freight tracks.

The LPA will operate with weekday peak headways of approximately five (5) minutes and approximately 10-minute headways during off-peak hours. Late evening, night, and early morning headways will be approximately 20 minutes. Weekend operation will match off-peak and late evening, night, and early morning headways.

Maintenance and Storage Facility

The MSF will be located on a 21-acre site in the City of Bellflower. Daily LRT servicing and cleaning, inspection and repairs, and storage will occur at the MSF. The facility will include a main shop building with administrative offices, a cleaning platform, a traction power substation (TPSS), employee parking, a vehicle wash facility, and a paint and body shop. The MSF site is adjacent to the LPA alignment, and lead tracks will be constructed within the LACMTA-owned PEROW. The east and west yard leads (i.e., the tracks leading from the mainline to the facility) will have sufficient length for a three-car train set. Access to the site will be via a signalized driveway at Somerset Boulevard and Bayou Avenue. The MSF will have storage tracks with sufficient length to store three-car train sets and a maintenance-of-way vehicle storage. The MSF will accommodate up to 80 light rail vehicles and provide over 200 parking spaces.

Ancillary Facilities

The LPA will include systems and facilities required to operate an LRT system, including an overhead catenary system, train control houses, radio antennas, tail tracks, crossovers, and TPSSs. There are 17 TPSS facilities planned for the LPA. The TPSSs will be metal prefabricated buildings approximately 15 feet wide by 40 feet long by 15 feet high.

Basis of Decision

The FTA considered the ability of the Build Alternatives to meet the Purpose and Need of the Project, along with the environmental effects of the alternatives. The FTA also reviewed the public and agency comments on the Draft and Final EIS/EIR. Attachment B to this ROD includes a summary of comments received during the public circulation period of the Final EIS/EIR and responses to comments. Based on these factors, the LPA meets the Purpose and

Need of the proposed action as outlined in Chapter 1 of the Final EIS/EIR and as discussed below.

Establish a reliable transit service that will enhance the connectivity of the existing transit network and reduce transit travel times to local and regional destinations. The LPA will connect the cities in southeast Los Angeles County with the surrounding region. The new high-quality, reliable transit service will allow for the increase in service and expansion of the geographical reach of the Metro Rail system that will enhance the appeal and viability of LRT as a mode of transportation in Los Angeles County. The transit network will have improved connectivity, with more connections to the existing Metro A (Blue) and C (Green) Lines.

Accommodate future travel demand, including the high number of transit trips made by Study Area residents. Transit demand in the Study Area is projected to increase. The LPA will provide a new high-quality, reliable transit service that will accommodate this demand and meet the future mobility needs of residents, employees, and visitors who travel within and through the corridor.

Improve access for the densely populated neighborhoods, major employment centers, and other key regional destinations where future growth is forecasted to occur within the Study Area. Similar to historical growth, population, housing, and employment are forecasted to grow in Los Angeles County and in the cities that will be traversed by or are adjacent to the alignment. The Study Area includes an abundance of high-use activity sites, including civic and governmental facilities, cultural centers, educational institutions, event venues, industrial and medical facilities, recreational centers, major commercial areas, and sports venues. The LPA will provide an alternative mode of transportation that supports future growth and improves access and mobility to and from the surrounding neighborhoods and activity centers.

Address mobility and access constraints faced by transit-dependent communities and environmental justice communities. The LPA will provide new transit services to environmental justice and transit-dependent communities that will be traversed by or adjacent to the alignment, thereby improving transit equity.

In addition to meeting the Purpose and Need, the LPA will reduce regional single-occupancy vehicle miles traveled (VMT) and associated air pollutant and greenhouse gas (GHG) emissions. Reducing regional VMT and associated GHG emissions is the top priority of state, regional, and local transportation and sustainability plans. The LPA will contribute to regional efforts to improve sustainability and reduce VMT. The LPA will create regional economic and social benefits by providing more frequent transit service and environmental and social benefits of improved air quality and reduced GHG.

Public Involvement and Outreach

As documented in Chapter 7 of the Final EIS/EIR, the FTA initiated the EIS process for the Project by publishing the NOI in the Federal Register on June 26, 2017. The NOI provided scoping meeting information, contact information, and project information. LACMTA issued Notices of Preparation (NOP) pursuant to the requirements of CEQA in May 2017, June 2017, and July 2018 informing the public of the Project, extending the comment period, and/or project evolution and identification of alternatives to carry forward into the Draft EIS/EIR process.

Scoping meetings were held with agencies, stakeholders, and the general public after the NOI and NOP filings in 2017 and 2018. The NEPA scoping process in 2017 included one (1) agency meeting and five (5) public scoping meetings. The agency meeting included representatives from the following:

- Alameda Corridor Transportation Authority
- California Public Utilities Commission
- City of Bell
- City of Downey
- City of South Gate
- City of Vernon
- Eco Rapid Transit
- FTA
- Los Angeles Department of Transportation
- Southern California Association of Governments

Additional scoping outreach was conducted in 2018 after a revised and recirculated NOP to provide an updated project description. Outreach included one (1) additional agency meeting and three (3) additional public scoping meetings. Approximately 532 stakeholders participated in the scoping meetings, and approximately 2,000 people watched a live webcast or a recording of the scoping meetings. Stakeholders submitted approximately 1,380 comments, including 75 comments from public agencies and elected officials.

On July 30, 2021, a Notice of Availability was published in the Federal Register for the Draft EIS/EIR and supporting reports. The Draft EIS/EIR was mailed to 261 agencies, organizations, elected officials, and other interested parties. Public noticing was done in accordance with NEPA and CEQA regulations. Public noticing methods included direct mail (approximately 60,000 stakeholders), door-to-door drop-offs (approximately 50,000 properties), legal notices, social media posts and ads, eblasts, SMS text messages (over 450 cellphone numbers), press releases, notices on the project website, information booths at local events, and pop-ups at LACMTA rail stations.

Outreach efforts were made to engage minority, low-income, limited English proficiency populations, and persons with disabilities. Because of the large ethnically Hispanic population in the Study Area, LACMTA provided Spanish-language materials at all public meetings and online. Japanese-language materials were also produced at all phases of the Project to inform residents of the Little Tokyo neighborhood of downtown Los Angeles. Quadrilingual meeting notices and materials (English/Spanish/Japanese/Korean) were produced starting with the community meetings in 2019, as Korean materials were suggested by stakeholders as a language need for the Little Tokyo community area.

The Draft EIS/EIR was available on the LACMTA website, and paper copies were available for public review at 11 locations in the Study Area. The public review period included four (4) virtual public hearings and four (4) virtual community information sessions. The public hearings were held to receive public comments in writing and orally via a court reporter. At the virtual community information sessions, participants were encouraged to submit their formal comments

through an online form, postal mail, by attending a virtual public hearing or tech booth and providing oral comment, or by completing a printed comment card. In total, 452 formal comments submissions (e.g., comment cards, emails, and letters) were received containing approximately 2,255 individual comments during the public review period.

Meetings were held with cities, agencies, and stakeholders after circulation of the Draft EIS/EIR. These meetings included discussions related to comments received on the Draft EIS/EIR as well as project updates. Additionally, four (4) in-person community update meetings were held in June 2023. Over 290 community members attended the four (4) meetings combined, which generated 77 inquiries during the questions and answers segment. In addition, a video recording of the presentation was distributed to the project outreach list and made available on the project website. Simultaneous Spanish interpretation was available at all meetings, and American Sign Language interpretation was provided at the June 5, 2023 meeting in the City of Paramount following an advance request from a member of the public.

Circulation of the Final EIS/EIR

The Final EIS/EIR was posted on the project website on March 28, 2024, and published in the Federal Register on March 29, 2024. Nineteen emails and letters were received from individuals, organizations, and public agencies on the Final EIS/EIR and were considered by FTA in this decision. A summary of the comments received on the Final EIS/EIR and responses to the comments is provided within Attachment B.

Post-Final EIS/EIR Circulation

Following release of the Draft EIS/EIR, freight spur track design was updated in coordination with UPRR to maintain an existing spur track connection at the private property at 9415 Burtis Street, owned by Konoike-Pacific California, Inc. (KPAC), along the west side of freight right-of-way. To avoid precluding a future spur connection to the property, a full acquisition of the private property was assumed in the Final EIS/EIR. After circulation of the Final EIS/EIR, Metro received a letter from the property owner on April 24, 2024, opposing the acquisition (included in Attachment B). Metro coordinated with the property owner and UPRR on a refinement to the project design. With the refinement, the spur access is not required at this property. Consequently, the permanent acquisition of this property is no longer required. The elimination of the property acquisition made in coordination with KPAC and UPRR will result in a reduction of impacts to the KPAC property compared to what was documented in the Final EIS/EIR.

Metro will continue to coordinate with property owners for any acquisitions, easements, and temporary construction easements. Consistent with all acquisitions required by the Project, Metro will provide just compensation for identified eligible businesses and residences as required under the Uniform Relocation Act and California Relocation Act. The differences between the Draft and Final EIS/EIR were minor and impacts would be less as documented in Section 4.3 of the Draft and Final EIS/EIR.

Determination and Finding

Section 4(f) of the Department of Transportation Act (23 CFR Part 774, 49 United States Code [USC] 303, 23 USC138)

The LPA would result in a permanent incorporation of land with de minimis impact on the activities, attributes, or features that qualify the following historic sites for protection under Section 4(f): Century Freeway-Transitway Historic District, 6101 Santa Fe Avenue, Huntington Park High School, Cudahy Substation, Los Angeles River channel, Rio Hondo channel, and San Gabriel River channel. The LPA would also result in a permanent incorporation of land with de minimis impact on Paramount Park, a public city-owned parkland and recreation area qualifying for protection under Section 4(f). The temporary occupancy exception under 23 CFR 774.13 to a Section 4(f) use applies to Paramount Park, the Los Angeles River Bike Path, the Rio Hondo Bike Path, and the San Gabriel River Mid-Trail because the duration of use is temporary, scope of work is minor, permanent adverse physical impacts are not anticipated, and any land being used will be fully restored. The City of Paramount Community Services and Recreation Department concurred with this finding for Paramount Park, and the County of Los Angeles Department of Public Works concurred with this finding regarding the three (3) trails. On March 12, 2024, the State Historic Preservation Office concurred that the project would not result in adverse effects to historic properties under Section 106 of the National Historic Preservation Act. No proximity impacts would be experienced at any of the Section 4(f) resources; therefore, the LPA would have no constructive use of Section 4(f) resources.

Air Quality Conformity (40 CFR Part 93)

The LPA is programmed in the SCAG 2023 Federal Transportation Improvement Program (FTIP) as a Project Study (ID LA0G1094). The FTA and the Federal Highway Administration (FHWA) determined that the FTIP was in conformity with the State Implementation Plan in a letter dated December 16, 2022. Consistency Amendment #23-03 was approved by the FTA and FHWA on June 9, 2023, which reflected a shift in opening year of the LPA from 2028 to 2035 and a decrease to the project cost associated with the length of the LPA alignment relative to other alternatives. The FTA and FHWA determined that the SCAG 2020-2045 RTP/SCS and the accompanying conformity analysis satisfied air quality conformity requirements on June 5, 2020. Similar to the FTIP, the 2020-2045 RTP/SCS was updated with Draft Amendment #3, which was approved by the FTA and FHWA on June 9, 2023.

The LPA is included in the SCAG 2020-2045 RTP/SCS Transportation System Financially Constrained Project List as the “West Santa Ana Branch Transit Corridor LRT (ID 1TR1011).” The LPA is included in a conforming RTP, and thus the LPA is included in emission budgets developed for the region. The LPA would implement the air quality control measures contained in the conforming FTIP and RTP, and the LPA meets the requirements of 40 CFR 93.117.

The LPA is located in the South Coast Air Basin, which is designated by the U.S. Environmental Protection Agency as being in nonattainment for ozone, lead, and fine particulate matter 2.5 microns or less in diameter under the National Ambient Air Quality Standards. The South Coast Air Basin is designated as a maintenance area for carbon monoxide, nitrogen dioxide, and respirable particulate matter 10 microns or less in diameter under the National Ambient Air

Quality Standards. The SCAG's Transportation Conformity Working Group determined on January 26, 2021, that the LPA is not a Project of Air Quality Concern as defined in 40 CFR 93.123(b)(1). The LPA is an electrically powered transit project that will not increase diesel vehicle traffic on the roadway network or directly generate carbon monoxide emissions.

Therefore, the LPA will not generate a new PM or carbon monoxide hot-spot or worsen an existing hot-spot. The LPA will not result in adverse effects related to air quality.

Endangered Species Act (16 USC Sections 1531 through 1544)

Based on literature reviews (e.g., U.S. Fish and Wildlife Service (USFWS) Critical Habitat Portal and Information Planning and Conservation online system) and field visits, the LPA is located in a heavily developed/disturbed area that does not support any plant species identified as a candidate, sensitive, or special-status species. Given the heavily developed area that consists of mostly developed streets and associated landscaping and street/community trees, most of the special-status wildlife species identified through literature reviews are not expected to occur due to lack of suitable habitat. During the field assessment, no special-status wildlife species were observed or otherwise detected. The LPA is not located within a Biological Resource Area or Significant Ecological Area. The LPA is not within or proximate to any native wildlife corridors, native wildlife nursery sites, critical habitat, land trust, Habitat Conservation Plan, or any other regional planning areas, as identified by a federal agency, the City of Los Angeles, or any other local, regional, or state agency. Informal consultation with the USFWS occurred in September 2018. The LPA will not adversely affect candidate, sensitive, or special-status species, and formal Section 7 consultation was not required.

Floodplain Management (Executive Order 11988)

The LPA will cross three (3) flood control channels with floodplains established by the Federal Emergency Management Agency (FEMA): the Los Angeles River, the Rio Hondo channel, and the San Gabriel River. Historic floodplains are protected from these rivers by levees and engineered channels constructed by the USACE. The FEMA-delineated 100-year floodplains are contained within the banks of the flood control channels for all three (3) water bodies. Tracks and structures associated with the LPA will be built above the existing river channel walls or levees. The LPA will not encroach along the length of the river parallel to the direction of flow or result in incompatible development within the floodplain for these channels. The Interstate 710 and State Route 91 freeway crossings will also occur near the 100-year flood zone. There will be no longitudinal encroachment into the floodplain or impact on beneficial floodplain values. Compliance with the Caltrans Municipal Separate Storm Sewer Systems Permit, along with local and federal floodplain regulations, will avoid and minimize impacts on the flood control facilities within Caltrans rights-of-way.

Construction within the Los Angeles River may require temporary coffer dams, which may temporarily affect the flood control channel. Construction of aerial structures over the Los Angeles River, the Rio Hondo channel, and the San Gabriel River will require new bridge piers within the channels. Earthwork and demolition will be required for new concrete bridge piers with a substantial construction footprint below the ordinary high-water mark. Construction access will also require construction equipment, materials, and storage inside the channels. Where construction occurs in the Los Angeles River, the Rio Hondo channel, or the San Gabriel

River, activities will comply with all applicable federal and local floodplain regulations, including applicable National Flood Insurance Program regulations. Los Angeles County Flood Control District permits will require the LPA to include measures that maintain drainage patterns at all times during construction. Work involving Los Angeles County Flood Control District storm drains and flood control channels will occur outside the period of October 15 through April 15 (storm season). Construction and operation of the LPA in the Los Angeles River, the Rio Hondo channel, and the San Gabriel River will also require review and approval by the USACE through a Section 408 permit. Construction will conform to the USACE full channel construction limitations established in the Section 408 permit. The LPA complies with U.S. Department of Transportation Order 5650.2 related to floodplain management and will not result in adverse effects to floodplains.

Preservation of the Nation's Wetlands (U.S. Department of Transportation Order 5660.1a)

The National Wetlands Inventory and the National Hydrography Dataset were reviewed to determine if any wetlands or other waters had been previously documented and mapped within the Study Area. Additionally, a field reconnaissance survey was completed. The LPA is located within the western edge of the Los Angeles River watershed. Based on the database review and jurisdictional delineation conducted, no wetlands are present within the Study Area. The Study Area had an absence of hydrophilic soils and had extremely limited distribution of vegetation. The drainages were classified by the USACE as non-wetland waters. The LPA will not adversely affect wetlands.

Section 106 of the National Historic Preservation Act (36 CFR Part 800)

The Area of Potential Effect for the LPA contains 19 historic properties, including portions of four (4) historic districts, that are listed or determined eligible for listing in the National Register of Historic Places. The LPA will have no adverse effect on built environment historic properties and no effects to archaeological historic properties. No minimization or mitigation measures are required. Implementation of Project Measure CR PM-1 (SOI Standards Design Review) is not necessary to conclude a finding of no adverse effect for the purposes of Section 106. However, as a result of Section 106 consultation among FTA, LACMTA, and Caltrans, Project Measure CR PM-1 (SOI Standards Design Review) will be implemented to support compliance with the Secretary of Interior's Standards and guidelines for Rehabilitation. The project measure will be implemented as design progresses for the new LRT bridge and C Line station that will be constructed within the 105 Historic District and extension of the Union Pacific LA River Rail Bridge's existing concrete piers. Additionally, coordination with Caltrans will continue as the project design progresses in relation to LPA elements within the 105 Historic District. The LPA will result in no adverse effect on historic properties. The California State Historic Preservation Officer concurred on this effects determination on March 12, 2024.

Clean Water Act (33 USC Section 1251 et seq.)

Waters of the U.S. within the project boundary are the Los Angeles River, Rio Hondo channel, and San Gabriel River. Operation and maintenance activities of the LPA could increase pollutant discharges to stormwater and/or groundwater that are typical for rail facilities (e.g., oils and grease, metals, solvents, pesticides). The LPA will be subject to the Industrial General Permit and the Los Angeles County Regional Municipal Separate Storm Sewer System (MS4)

National Pollutant Discharge Elimination System (NPDES) permit during the operational phase and the Construction General Permit during the construction phase, each pursuant to the Los Angeles Basin Plan. The MS4 NPDES permit requires implementation of site design, source control, and treatment control best management practices to the maximum extent practical. The stormwater Industrial General Permit (Order No. 2014-0057-DWQ [as amended by Order 2015-0122-DWQ]) requires preparation of an industrial Stormwater Pollution Prevention Plan and a monitoring plan for industrial facilities, including the MSF. Compliance with these permits will be required by the Los Angeles Regional Water Quality Control Board as a condition of approval of the Section 401 Water Quality Certification or as conditions of various NPDES permits prior to implementation. It is through the Section 401 Water Quality Certification that the LPA will comply with Section 401 of the Clean Water Act.

LACMTA is required to obtain and comply with a Section 402 Permit from the State Water Resources Control Board because construction sites would occur on an acre or greater of land or discharge wastewater or stormwater directly into a surface water of the United States. In addition, related to hazardous materials, Mitigation Measure HAZ PM-4 (Handling, Storage, and Transport of Hazardous Materials or Wastes) states that LACMTA will comply with the State Water Resources Control Board Construction Clean Water Act Section 402 General Permit conditions and requirements for transport, labeling, containment, cover, and other best management practices for the storage of hazardous materials during construction.

The LPA involves the discharge of dredged and fill materials into the Los Angeles River, Rio Hondo channel, and San Gabriel River, which are classified as waters of the United States. The LPA will require a Clean Water Act Section 404 permit from the USACE for discharge of dredged or fill material into waters of the United States. The LPA will not result in adverse effects related to jurisdictional water resources.

Rivers and Harbors Act (33 USC 408)

Engineering plans for aerial crossings of the Los Angeles River, Rio Hondo channel, and San Gabriel River must be reviewed and approved by the USACE under the Section 408 program. The LPA will not result in adverse effects related to jurisdictional water resources.

Section 6(f) of the Department of Land and Water Conservation Fund Act (16 USC 4601-1; and 36 CFR Part 59)

Section 6(f) of the Department of Land and Water Conservation Act requires that an area funded with this assistance be “continually maintained in public recreation use” unless the National Park Service approves substitution per the Conversion Requirements, including conversion to other uses either “in whole or in part” (36 CFR Ch 1, Section 59.3). The LPA will not convert any recreational areas funded by the Land and Water Conservation Fund to a non-recreational use; therefore, there is no conversion of Section 6(f) property.

Environmental Justice (Executive Orders 12898 and 14096)

Low-income and minority populations are present across the Study Area. The LPA will result in adverse effects related to traffic operations and parking; land use consistency; and noise and vibration during LRT operations. The LPA will displace approximately 59 businesses and

approximately 443 employees in addition to 13 residential units and approximately 47 residential occupants. The LPA will also acquire portions of rail ROW owned by the UPRR and the Ports of Los Angeles and Long Beach, including portions of the San Pedro Subdivision, La Habra Subdivision, and Wilmington Subdivision. LACMTA will provide relocation assistance and compensation for displaced businesses and residences as required under the Uniform Relocation Assistance and Real Property Acquisition Act.

During construction, the LPA will result in temporary adverse effects pertaining to transportation, land use, acquisitions and displacements, communities and neighborhoods, air quality, noise and vibration, and parklands and community facilities. The LPA will require temporary construction easements (TCEs). TCEs will be returned to preconstruction conditions once construction is complete. TCEs will be temporary and will not change the primary site function. LACMTA will provide compensation for eligible businesses and residents affected during construction as required under the Uniform Relocation Assistance and Real Property Acquisition Act.

Communities with environmental justice concerns and non-environmental justice populations will both experience impacts. The effects are not more severe or greater in magnitude in areas with environmental justice concerns versus comparable areas of non-environmental justice populations within the Study Area. With implementation of mitigation as outlined in the Mitigation Monitoring and Reporting Program (MMRP) and with consideration to off-setting benefits (i.e., increased mobility of environmental justice populations, improved air quality, reduced regional energy consumption, and economic/fiscal benefits), the LPA will not result in disproportionately high and adverse effects to environmental justice communities.

Measures That Mitigate Adverse Effects

The LPA incorporates all practicable means to mitigate environmental harm. The measures, which are commitments imposed under this ROD, are described in the *West Santa Ana Branch Transit Corridor Project Final EIS/EIR* and included in the MMRP (Attachment A) to ensure fulfillment of all environmental and related commitments. Any change in such commitments from the description in the Final EIS/EIR will require a review in accordance with 23 CFR Parts 771.129-130 and must be approved by the FTA.



Digitally signed by
Ray Tellis
Date: 2024.08.23

Ray Tellis
Regional Administrator
Federal Transit Administration, Region IX

Attachments:

- A. Mitigation Monitoring and Reporting Program
- B. Summary of Comments on the Final EIS/EIR

West Santa Ana Branch Transit Corridor

Attachment A: Mitigation Monitoring and Reporting Program



Metro®

WEST SANTA ANA BRANCH TRANSIT CORRIDOR PROJECT

Mitigation Monitoring and Reporting Program

Prepared for:



Los Angeles County
Metropolitan Transportation Authority

March 2024

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ACRONYMS AND ABBREVIATIONS

Acronyms	Definition
CalGEM	California Department of Conservation Geologic Energy Management Division
CDFW	California Department of Fish and Wildlife
CEQA	California Environmental Quality Act
CRHR	California Register of Historic Resources
CRMDP	Cultural Resources Monitoring and Discovery Program
EIS/EIR	environmental impact statement/environmental impact report
FTA	Federal Transit Administration
HVAC	heating, ventilation, and air conditioning
LPA	Locally Preferred Alternative
NRHP	National Register of Historic Places
Metro	Los Angeles County Metropolitan Transportation Authority
MMRP	Mitigation Monitoring and Reporting Program
NEPA	National Environmental Policy Act
PEROW	Pacific Electric Right-of-Way
PRMMP	Paleontological Resources Mitigation and Monitoring Program
SVP	Society of Vertebrate Paleontology
TMP	Transportation Management Plan(s)
TPSS	traction power substation
WSAB	West Santa Ana Branch

1 MITIGATION MONITORING AND REPORTING PROGRAM

1.1 Introduction

This Mitigation Monitoring and Reporting Program (MMRP) is for the West Santa Branch (WSAB) Transit Corridor Project.¹ The MMRP has been prepared in compliance with state and federal law and reflects the mitigation measures identified in the WSAB Transit Corridor Project Final Environmental Impact Statement and Environmental Impact Report (EIS/EIR). Mitigation measures are actions designed to avoid, minimize, rectify, reduce, eliminate or compensate for adverse or significant impacts.

The California Environmental Quality Act (CEQA) and regulations implementing the National Environmental Policy Act (NEPA) require an enforceable mitigation and monitoring program for projects. Section 21081.6 of the California Public Resources Code requires a Lead Agency under CEQA to adopt a “reporting or monitoring program for the changes made to the project or conditions of project approval, adopted in order to mitigate or avoid significant effects on the environment” (Section 15097 of the CEQA Guidelines provides additional direction on mitigation monitoring or reporting). Under the NEPA regulations, a monitoring and enforcement program shall be adopted and summarized where applicable to any mitigation (40 Code of Federal Regulations 1505.2(c) and 23 Code of Federal Regulations 771.27A). The Federal Transit Administration is the Lead Agency under NEPA, and the Los Angeles County Metropolitan Transportation Authority (Metro) is the Lead Agency under CEQA.

Metro shall be responsible for administering and ensuring full compliance with the provisions of the MMRP.

1.2 Purpose

The primary purpose of the MMRP is to ensure that the mitigation measures identified in the Final EIS/EIR are implemented, effectively minimizing the identified environmental effects. Table 1 includes all mitigation measures identified in the Final EIS/EIR that would lessen or avoid potentially significant and adverse environmental impacts resulting from implementation of the Project. Each mitigation measure is categorized by environmental topic and corresponding ID, with identification of:

- Monitoring Action/Procedure: A description of how compliance with the mitigation measures will be monitored or reviewed.
- Responsible Party for Implementation: The entity accountable for implementing the mitigation measures.
- Monitoring Responsibility and Implementation Phase: The agency responsible for overseeing the implementation of mitigation and the project phase or milestone when the measure is implemented.
- Outside Agency/Organization Coordination: The agencies or organizations that Metro will coordinate with for implementation of the measure, where applicable.

¹ As a result of a renaming campaign, the Southeast Gateway Line was unveiled as the new project name on January 22, 2024, to be used as the Project advances.

Table 1. Mitigation Monitoring and Reporting Program

Mitigation Measures	Monitoring Action/Procedure ¹	Responsible Party for Implementation	1. Monitoring Responsibility 2. Implementation Phase	Outside Agency/ Organization Coordination
Transportation				
TRA-1: Florence Avenue/California Avenue (East). Extend the northbound left-turn lane to 300 feet. Metro will implement this measure subject to approval of the applicable jurisdiction (City of Huntington Park).	Review design plans for compliance; verify in the field.	Construction Contractor/ Metro	1. Metro 2. Final Design, Construction, Prior to Operation	City of Huntington Park
TRA-2: Bell Avenue/Bissell Street. Add a westbound left-turn lane. Convert westbound left-through-right lane into a through-right lane. Metro will implement this measure subject to approval of the applicable jurisdiction (City of Bell).	Review design plans for compliance; verify in the field.	Construction Contractor/ Metro	1. Metro 2. Final Design, Construction, Prior to Operation	City of Bell
TRA-3: Gage Avenue/Salt Lake Avenue (West). Add eastbound right-turn lane with a 250-foot turn bay. Extend westbound left-turn lane with a 225-foot turn bay. Metro will implement this measure subject to approval of the applicable jurisdiction (City of Bell).	Review design plans for compliance; verify in the field.	Construction Contractor/ Metro	1. Metro 2. Final Design, Construction, Prior to Operation	City of Bell
TRA-4: Gage Avenue/California Avenue. Extend eastbound left-turn lane with a 150-foot turn bay. Metro will implement this measure subject to approval of the applicable jurisdiction (City of Bell).	Review design plans for compliance; verify in the field.	Construction Contractor/ Metro	1. Metro 2. Final Design, Construction, Prior to Operation	City of Bell
TRA-5: Randolph Street/State Street. Add a westbound left-turn lane with a 150-foot turn bay. Metro will implement this measure subject to approval of the applicable jurisdiction (City of Huntington Park).	Review design plans for compliance; verify in the field.	Construction Contractor/ Metro	1. Metro 2. Final Design, Construction, Prior to Operation	City of Huntington Park
TRA-6: Randolph Street/Miles Avenue. Extend northbound left-turn lane to 150-foot turn bay. Metro will implement this measure subject to approval of the applicable jurisdiction (City of Huntington Park).	Review design plans for compliance; verify in the field.	Construction Contractor/ Metro	1. Metro 2. Final Design, Construction, Prior to Operation	City of Huntington Park
TRA-7: Randolph Street/Seville Avenue. Add northbound and southbound left-turn lane with 150-foot left-turn bays. Metro will implement this measure subject to approval of the applicable jurisdiction (City of Huntington Park).	Review design plans for compliance; verify in the field.	Construction Contractor/ Metro	1. Metro 2. Final Design, Construction, Prior to Operation	City of Huntington Park

Mitigation Measures	Monitoring Action/Procedure ¹	Responsible Party for Implementation	1. Monitoring Responsibility 2. Implementation Phase	Outside Agency/ Organization Coordination
TRA-8: Randolph Street/Pacific Boulevard. Extend southbound left-turn lane to 150-foot turn bay. Metro will implement this measure subject to approval of the applicable jurisdiction (City of Huntington Park).	Review design plans for compliance; verify in the field.	Construction Contractor/ Metro	1. Metro 2. Final Design, Construction, Pre-revenue Operation	City of Huntington Park
TRA-9: Randolph Street/Rugby Avenue. Add northbound and southbound left-turn lane with 100-foot turn bays. Metro will implement this measure subject to approval of the applicable jurisdiction (City of Huntington Park).	Review design plans for compliance; verify in the field.	Construction Contractor/ Metro	1. Metro 2. Final Design, Construction, Prior to Operation	City of Huntington Park
TRA-10: Randolph Street/Albany Street. Add northbound and southbound left-turn lane with 100-foot turn bays. Metro will implement this measure subject to approval of the applicable jurisdiction (City of Huntington Park).	Review design plans for compliance; verify in the field.	Construction Contractor/ Metro	1. Metro 2. Final Design, Construction, Prior to Operation	City of Huntington Park
TRA-11: Randolph Street/Alameda Street (West). Add northbound left-turn lane with 150-foot turn bay. Metro will implement this measure subject to approval of the applicable jurisdiction (City of Huntington Park).	Review design plans for compliance; verify in the field.	Construction Contractor/ Metro	1. Metro 2. Final Design, Construction, Prior to Operation	City of Huntington Park
TRA-12: Gardendale Street/Center Street. Convert the two-way stop-controlled intersection to a signalized intersection. Add a westbound through lane. Metro will implement this measure subject to approval of the applicable jurisdiction (City of South Gate and City of Downey).	Review design plans for compliance; verify in the field.	Construction Contractor/ Metro	1. Metro 2. Final Design, Construction, Prior to Operation	City of South Gate, City of Downey
TRA-13: Gardendale Street/ Industrial Avenue. Convert the two-way stop-controlled intersection to a signalized intersection. Add a westbound through lane, the length of which will continue through the grade crossing. Metro will implement this measure subject to approval of the applicable jurisdiction (City of South Gate and City of Downey).	Review design plans for compliance; verify in the field.	Construction Contractor/ Metro	1. Metro 2. Final Design, Construction, Prior to Operation	City of South Gate, City of Downey
TRA-14: Flora Vista Street/Clark Avenue. Convert the two-way stop-controlled intersection to a signalized intersection. Metro will implement this measure subject to approval of the applicable jurisdiction (City of Bellflower).	Review design plans for compliance; verify in the field.	Construction Contractor; Metro	1. Metro 2. Final Design, Construction, Prior to Operation	City of Bellflower
TRA-15: Alondra Boulevard/Clark Avenue. Extend eastbound left-turn lane to 150 feet. Extend westbound left-turn lane to 200 feet. Metro will implement this measure subject to approval of the applicable jurisdiction (City of Bellflower).	Review design plans for compliance; verify in the field.	Construction Contractor/ Metro	1. Metro 2. Final Design, Construction, Prior to Operation	City of Bellflower

Mitigation Measures	Monitoring Action/Procedure ¹	Responsible Party for Implementation	1. Monitoring Responsibility 2. Implementation Phase	Outside Agency/Organization Coordination
TRA-16: Artesia Boulevard/Dumont Avenue. Add westbound through lane. Metro will implement this measure subject to approval of the applicable jurisdiction (City of Cerritos).	Review design plans for compliance; verify in the field.	Construction Contractor/Metro	1. Metro 2. Final Design, Construction, Prior to Operation	City of Cerritos
TRA-17: Business Circle/ Studebaker Road. Convert the two-way stop-controlled intersection to a signalized intersection. Metro will implement this measure subject to approval of the applicable jurisdiction (City of Cerritos).	Review design plans for compliance; verify in the field.	Construction Contractor/Metro	1. Metro 2. Final Design, Construction, Prior to Operation	City of Cerritos
TRA-18 Transportation Management Plan(s) (TMP): TMP(s) will be prepared to address construction impacts on transportation facilities as applicable under the jurisdiction of all involved cities and agencies. The TMP(s) will address potential impacts from construction activities on vehicular, transit, pedestrian, and bicycle access and mobility, including, but not limited to, temporary lane/roadway, sidewalk, bicycle facility, and freeway ramp closures; detours; increases in traffic volumes (including regular traffic and construction traffic, construction equipment, materials delivery vehicles, waste/haul vehicles, and employee commutes); construction parking; and emergency services (e.g., fire, police, ambulances). The development of the TMP will be coordinated with Metro, local jurisdictions (cities and the county), agencies, and other potentially affected parties (e.g., school bus and transit operators and police, fire, and emergency services providers). The TMP(s) will identify specific TMP strategies, the party/parties responsible for implementing those strategies, the agencies and parties the TMP strategies will be coordinated with, and implementation timing. The TMP will include specific strategies to address short term, project-related construction effects on traffic, bicyclists, pedestrians, and area residents and businesses. The following list, which is part of this mitigation measure, identifies the types of TMP strategies that will be applicable:	Review and verify preparation of TMP(s) and submission to Metro. Verify in the field that TMP measures are and have been implemented.	Construction Contractor/Metro	1. Metro 2. Final Design/Prior to Construction, During Construction, After Construction	City of Los Angeles, City of Vernon, City of Huntington Park, City of Bell, City of Cudahy, City of South Gate, City of Downey, City of Paramount, City of Bellflower, City of Cerritos, City of Artesia, Los Angeles County, local transportation agencies, California Department of Transportation, local emergency services providers, school districts, and local business owners

Mitigation Measures	Monitoring Action/Procedure ¹	Responsible Party for Implementation	1. Monitoring Responsibility 2. Implementation Phase	Outside Agency/ Organization Coordination
<ul style="list-style-type: none"> ▪ Public Information <ul style="list-style-type: none"> – Brochures and Mailers – Press Releases – Paid Advertising – Public Meetings/Speakers Bureau – Internet – Public Meeting Rooms ▪ Motorist Information <ul style="list-style-type: none"> – Portable Changeable-Message Signs – Ground-mounted Signs ▪ Incident Management <ul style="list-style-type: none"> – Traffic Management Team ▪ Construction <ul style="list-style-type: none"> – Lane Closure Chart – Reduced Speed Zone – Incentives and Disincentives (e.g., early completion payments and late re-opening penalties for contractors) – Movable Barrier – Temporary Pedestrian Walkways and Detour <p>The Resident Engineer will require the Construction Contractor to implement the strategies in the TMP prior to, during, and after construction activities, as required in the TMP.</p> <p>Pedestrian and Bicycle Facility Closures: When sidewalks, crosswalks, and/or bicycle facilities are temporarily closed during construction, pedestrian and bicycle detours will be developed and clearly signed prior to closing those facilities.</p>				

Mitigation Measures	Monitoring Action/Procedure ¹	Responsible Party for Implementation	1. Monitoring Responsibility 2. Implementation Phase	Outside Agency/ Organization Coordination
<p>TRA-19 Parking Monitoring and Community Outreach:</p> <ul style="list-style-type: none"> Within the one-half-mile area surrounding each project station, an assessment would be conducted to monitor on-street and off-street parking activity resulting from project operation. The assessment would compare parking availability prior to the opening of service to the availability six months following the opening of service. Surveys will be conducted at each station area to identify where WSAB parking demand is at least 20 percent greater than the demand before opening of service (i.e., the new transit service has increased parking demand by 20 percent or more). Metro will work with the appropriate local jurisdiction, business owners, and affected communities for that station area to assess the need for an appropriate on- and off-street parking management program, considering the nearby community's and each proposed station's parking needs. Specific parking management strategies could include restriping, modifying parking restrictions, and adjusting the time limits for on-street parking. For off-street parking, signing and enforcement services could be included. Another element could include implementing or enhancing a residential permit parking program for the affected neighborhoods. Metro would coordinate with and support jurisdictions in outreach meetings within the affected communities to gauge the interest of residents participating in a residential permit parking program (prior to the opening of the new light rail service), regardless of whether parking shortages have been identified. Metro may implement a parking fee at the transit parking facilities, consistent with the Supportive Transit Parking Program Master Plan. 	<p>Develop and implement survey to monitor on-street and off-street parking activity and report conditions.</p> <p>Verify coordination efforts with local jurisdictions on development of parking management strategies where applicable.</p>	Metro	<p>1. Metro 2. Prior to Operation and 6 months Post-revenue Operation</p>	<p>City of Los Angeles, Los Angeles County, City of Huntington Park, City of Vernon, City of Bell, City of Cudahy, City of South Gate, City of Downey, City of Paramount, City of Bellflower, City of Artesia, City of Cerritos; local business owners</p>

Mitigation Measures	Monitoring Action/Procedure ¹	Responsible Party for Implementation	1. Monitoring Responsibility 2. Implementation Phase	Outside Agency/ Organization Coordination
TRA-20 Parking Mitigation Program (Permanent): Metro will coordinate with local jurisdictions to address the physical loss of public parking spaces resulting from implementation of the Locally Preferred Alternative. This could include, but not be limited to, restriping the existing street to allow for diagonal parking, reducing the number of restricted parking areas, utilizing remnants of parcels acquired for the Project as off-street parking, and adjusting the time limits for on-street parking.	Verify coordination efforts with local jurisdictions where parking is physically removed. Verify development of parking management strategies. Verify in the field.	Metro	1. Metro 2. Final Design, Construction/Prior to Operation	City of Los Angeles, City of Vernon, City of Huntington Park, City of Bell, City of Cudahy, City of South Gate, City of Downey, City of Paramount, City of Bellflower, City of Cerritos, and City of Artesia, Los Angeles County
TRA-21 Loss of Parking (Construction): Metro will coordinate with local jurisdictions to address the loss of public parking spaces during construction. This could include, but not be limited to, restriping the existing street to allow for diagonal parking, reducing the number of restricted parking areas, phasing construction activities in a way that minimizes parking disruption, and adjusting the time limits for on-street parking.	Verify coordination efforts with local jurisdictions where parking is physically removed temporarily during construction. Verify development and implementation of parking management strategies. Verify in the field.	Construction Contractor/ Metro	1. Metro 2. Final Design, Construction	City of Los Angeles, City of Vernon, City of Huntington Park, City of Bell, City of Cudahy, City of South Gate, City of Downey, City of Paramount, City of Bellflower, City of Cerritos, and City of Artesia, Los Angeles County

Mitigation Measures	Monitoring Action/Procedure ¹	Responsible Party for Implementation	1. Monitoring Responsibility 2. Implementation Phase	Outside Agency/ Organization Coordination
Land Use				
LU-1 Consistency with Bike Plans: During the planning process and prior to construction, Metro will prepare amended language for each affected bicycle plan demonstrating that existing, planned, and modified bicycle facilities will be connected during project operation. This language will be subject to the approval of the Cities of Huntington Park, South Gate, Bell, Paramount, and Bellflower, as applicable. Metro will modify the following bike trail segments into a Class II bikeway: <ul style="list-style-type: none">▪ Within the San Pedro Subdivision Right-of-Way between Ardmore Avenue to Century Boulevard (City of South Gate)▪ Along Salt Lake Avenue from Gage Avenue to Florence Avenue (City of Bell) Metro will relocate the following bike trail segments: <ul style="list-style-type: none">▪ Paramount Bike Trail segments from Paramount Boulevard to Somerset Boulevard within the Metro-owned Pacific Electric Right-of-Way (PEROW) (City of Paramount)▪ Bellflower Bike and Trail segment from Lakewood Boulevard to the maximum extent of Clark Avenue within the Metro-owned PEROW (City of Paramount and City of Bellflower)	Bike Plans: Review and verify preparation of amended language for each affected bicycle plan. Relocated Segments: Review design plans for relocated segments. Verify in field.	Bike Plans: Metro Relocated Segments: Construction Contractor/ Metro	1. Metro 2. Bike Plans: Prior to Pre-revenue Operations Relocated Segments: Final Design, Construction, Prior to Operations	City of Huntington Park, City of South Gate, City of Bell, City of Paramount, City of Bellflower
TRA-19 and TRA-20	Refer to TRA-19 and TRA-20	Refer to TRA-19 and TRA-20	Refer to TRA-19 and TRA-20	Refer to TRA-19 and TRA-20
COM-1 Construction Outreach Plan	Refer to COM-1	Refer to COM-1	Refer to COM-1	Refer to COM-1
NOI-6 Noise Control Plan	Refer to NOI-6	Refer to NOI-6	Refer to NOI-6	Refer to NOI-6
VIB-3 through VIB-7	Refer to VIB-3 through VIB-7	Refer to VIB-3 through VIB-7	Refer to VIB-3 through VIB-7	Refer to VIB-3 through VIB-7

Mitigation Measures	Monitoring Action/Procedure ¹	Responsible Party for Implementation	1. Monitoring Responsibility 2. Implementation Phase	Outside Agency/ Organization Coordination
Communities and Neighborhoods				
<p>COM-1 Construction Outreach Plan: Metro will develop a Construction Outreach Plan as part of Metro's Construction Relation & Mitigation Programs in Community Relations in coordination with affected communities, community facilities, and businesses that will be implemented by Metro and its contractors during construction of the Project. The Construction Outreach Plan will include, but not be limited to, the following elements:</p> <ul style="list-style-type: none"> ▪ Maintain access to community assets (including, but not limited to, schools and bike trails) and neighborhoods during construction as practicable ▪ Maintain access to businesses during the operating hours of the businesses as practicable ▪ Provide signage to direct pedestrians and motorists around construction areas; around sidewalk, street, and lane closures; to entrances of businesses and community assets; to maintain the flow of traffic around the construction area; and to notify pedestrians and motorists of any permanent closed streets prior to the closure of such streets ▪ Provide appropriate signage, barriers, and fencing for pedestrian and bicycle detour routes to prevent pedestrians and bicyclists from entering the construction zones ▪ Provide signage alerting potential customers that businesses are open during construction and clearly mark detours as appropriate ▪ Provide the public with updates, alerts, and schedules during construction and prior to the start of revenue service through informational meetings, the project website, and other forms of communication such as, but not limited to, mailings and flyers to businesses and residences with 0.25-mile of the construction zone 	<p>Verify development and implementation of Construction Outreach Plan.</p> <p>Verify coordination efforts with applicable parties.</p>	Construction Contractor/ Metro	1. Metro 2. Final Design, Prior to Construction, During Construction	City of Los Angeles, City of Vernon, City of Huntington Park, City of Bell, City of Cudahy, City of South Gate, City of Downey, City of Paramount, City of Bellflower, City of Cerritos, City of Artesia, and Los Angeles County; local agencies and organizations; local business owners

Mitigation Measures	Monitoring Action/Procedure ¹	Responsible Party for Implementation	1. Monitoring Responsibility 2. Implementation Phase	Outside Agency/ Organization Coordination
<ul style="list-style-type: none"> ▪ Develop a mitigation plan to support businesses affected by construction to help reduce impacts to businesses during construction ▪ Coordinate construction activities with other capital improvement projects being carried out nearby to minimize construction impacts and competing needs for detour routes 				
TRA-1 through TRA-17	Refer to TRA-1 and TRA-17	Refer to TRA-1 and TRA-17	Refer to TRA-1 and TRA-17	Refer to TRA-1 and TRA-17
VA-1 through VA-3	Refer to VA-1 and VA-3	Refer to VA-1 and VA-3	Refer to VA-1 and VA-3	Refer to VA-1 and VA-3
NOI-1 through NOI-6	Refer to NOI-1 through NOI-6	Refer to NOI-1 through NOI-6	Refer to NOI-1 through NOI-6	Refer to NOI-1 through NOI-6
VIB-3 through VIB-7	Refer to VIB-3 through VIB-7	Refer to VIB-3 through VIB-7	Refer to VIB-3 through VIB-7	Refer to VIB-3 through VIB-7
Visual and Aesthetics				
VA-1 Screening at Somerset Boulevard: The existing World Energy landscaping and decorative wall north of Somerset Boulevard and east of the light rail transit tracks will remain in place with the exception of a segment parallel to the storage tracks. If segments of the existing decorative screening wall and/or landscaping directly south of the World Energy storage tracks and east of the light rail transit tracks are removed, these screening elements will be replaced with a new screening wall and/or landscaping that are at least as decorative in terms of design, materials, and screening height as the existing wall and landscaping. A decorative screening wall and/or landscaping will be placed within the Pacific Electric Right-of-Way between the light rail transit tracks and storage tracks at a length and height capable of screening the refinery storage track from views on Somerset Boulevard.	Review design plans for compliance. Field verify.	Construction Contractor/ Metro	1. Metro 2. Final Design, Construction	Not Applicable

Mitigation Measures	Monitoring Action/Procedure ¹	Responsible Party for Implementation	1. Monitoring Responsibility 2. Implementation Phase	Outside Agency/Organization Coordination
VA-2 Relocation of “Belle”: Metro will provide relocation site alternatives to determine the best possible location to relocate the public art statue, “Belle,” in its existing condition, subject to a condition assessment detailing the current physical condition of the artwork. The site will be subject to approval by the City of Bellflower.	Verify condition assessment. Verify identification of relocation site alternatives. Field verify relocation for the public art statue, “Belle.”	Construction Contractor/Metro	1. Metro 2. Final Design, Prior to Construction at the location of the statue	City of Bellflower
VA-3 Construction Screening: During construction, the perimeter of construction staging areas and laydown areas will be screened to shield construction activities and laydown areas from adjacent visually sensitive land uses, including the following: <ul style="list-style-type: none">▪ Residential properties▪ Salt Lake Park (City of Huntington Park)▪ Hollydale Community Park (City of South Gate)▪ Original Bellflower Pacific Electric Station (City of Bellflower)▪ Artesia Historical Museum (City of Artesia)▪ Old Station #30 (City of Artesia) The screening will be designed consistent with the Metro requirements and in coordination with cities and may incorporate artwork, Metro-branded design treatments, and/or community-relevant messaging.	Review construction plan for compliance. Verify in the field. Verify coordination efforts with local jurisdiction.	Construction Contractor/Metro	1. Metro 2. Prior to Construction; Construction	City of Huntington Park, City of South Gate, City of Bellflower, City of Artesia
VA-4 Construction Lighting: During construction, nighttime construction lighting will be directed toward the interior of the construction area and shielded with temporary construction screening approved by Metro to limit light spillover into adjacent areas.	Review construction plan for compliance. Verify in the field.	Construction Contractor/Metro	1. Metro 2. Construction	Not Applicable.
NOI-1 through NOI-6	Refer to NOI-1 through NOI-6	Refer to NOI-1 through NOI-6	Refer to NOI-1 through NOI-6	Refer to NOI-1 through NOI-6

Mitigation Measures	Monitoring Action/Procedure ¹	Responsible Party for Implementation	1. Monitoring Responsibility 2. Implementation Phase	Outside Agency/ Organization Coordination
Noise and Vibration				
NOI-1 Soundwalls: Soundwalls will be placed at-grade or at the edge of aerial structures to reduce noise related to light rail transit vehicles at the identified sensitive receiver locations shown in the following table where moderate and severe impacts have been identified based on design completed to date. Height and length will be verified during final design with the objective to reduce noise from light rail trains to below the FTA moderate impact criteria. Where separate soundwalls are identified in close proximity and gaps are not required for access, they may be linked to form a continuous wall.	Review design plans for compliance. Verify in the field.	Construction Contractor/ Metro	1. Metro 2. Final Design, Construction, Prior to Operations	Not Applicable.

NOI-1 LRT Soundwall Locations

Civil Station	Location	Track Side	Placement	Height
653+04 to 657+60	Between 55th St and 57th St	Left	Aerial	4 Feet
698+30 to 702+25	Between Cottage St and Albany St	Right	At-grade	8 Feet
703+25 to 709+25	Between Albany St and Santa Fe Ave	Right	At-grade	8 Feet
711+00 to 719+50	Between Santa Fe Ave and Rugby Ave	Left	At-grade	8 Feet
710+15 to 720+90	Between Santa Fe Ave and Rugby Ave	Right	At-grade	8 Feet
721+50 to 724+50	Between Rugby Ave and Pacific Blvd	Right	At-grade	8 Feet
729+50 to 732+50	Between Rita Ave and Seville Ave	Right	At-grade	8 Feet
733+75 to 743+00	Between Seville Ave and Miles Ave	Left	At-grade	8 Feet
733+50 to 743+00	Between Seville Ave and Miles Ave	Right	At-grade	8 Feet

Mitigation Measures					Monitoring Action/Procedure ¹	Responsible Party for Implementation	1. Monitoring Responsibility 2. Implementation Phase	Outside Agency/ Organization Coordination
744+00 to 762+80	Between Miles Ave and State St	Right	At-grade	8 Feet				
745+75 to 762+00	Between west of Oak St and State St	Left	At-grade	8 Feet				
764+00 to 769+75	Between State St. and Plaska Ave	Right	At-grade	12 feet				
769+75 to 779+00	Between Plaska Ave and Hollenbeck St	Right	At-grade	10 feet				
778+00 to 789+00	Between Hollenbeck St and Benedict Wy	Right	Aerial	6 Feet				
803+00 to 813+69	Between Gage Ave and Bell Ave	Left	At-grade	8 feet				
815+15 to 829+85	Between Bell Ave and Florence Ave	Left	At-grade	8 feet				
840+00 to 868+75	Between Live Oak St and Otis Ave	Right	At-grade	8 feet				
840+40 to 862+50	Between Live Oak St and Olive St	Left	At-grade	8 feet				
870+50 to 878+00	Between Otis Ave and Santa Ana St	Right	At-grade	8 feet				
872+50 to 877+50	Between Otis Ave and Santa Ana St	Left	At-grade	8 feet				
881+20 to 893+50	Between Santa Ana St and Cecilia St	Left	At-grade	8 feet				
957+50 to 962+50	Between Southern Ave and Duncan Wy	Right	At-grade	8 feet				
962+50 to 973+00	Between Duncan Wy and center of Los Angeles River channel	Right	Aerial	6 feet				

Mitigation Measures					Monitoring Action/Procedure ¹	Responsible Party for Implementation	1. Monitoring Responsibility 2. Implementation Phase	Outside Agency/ Organization Coordination
971+00 to 983+00	Between center of Los Angeles River channel and Frontage Rd	Left	Aerial	8 feet				
1023+00 to 1029+75	Between Imperial Hwy and south of Garfield Ave	Left	Aerial	8 feet				
1089+50 to 1096+00	Between I-105 Fwy and Happy St	Right	At-grade	14 feet				
1096+00 to 1107+75	Between Happy St and Pacific Electric Right-of-Way (PEROW)	Right	At-grade	16 feet				
1089+50 to 1096+50	Between I-105 Fwy and Pearle St	Left	At-grade	12 feet				
1096+50 to 1104+00	Between Happy St and south of Howe St	Left	At-grade	16 feet				
1104+00 to 1108+50	Between south of Howe St and PEROW	Left	At-grade	12 feet				
1108+50 to 1120+50	Between Union Pacific Right-of-Way and Colorado Ave	Left	At-grade	14 feet				
1096+50 to 1104+00	Between Happy St and south of Howe St	Left	Aerial	8 feet				
1096+50 to 1104+00	Between Happy St and south of Howe St	Right	Aerial	8 feet				
1104+00 to 1124+00	Between south of Howe St and Paramount Blvd	Left	Aerial	6 feet				

Mitigation Measures					Monitoring Action/Procedure ¹	Responsible Party for Implementation	1. Monitoring Responsibility 2. Implementation Phase	Outside Agency/ Organization Coordination
1104+00 to 1108+00	Between south of Howe St and PEROW	Right	Aerial	6 feet				
1124+00 to 1134+50	Between Paramount Blvd and approximately 350 feet east of 144th St	Left	Aerial	4 feet				
1141+00 to 1155+50	Between Paramount High School railroad pedestrian crossing and Downey Ave	Left	Aerial	8 feet				
1140+00 to 1167+00	Between Paramount High School railroad pedestrian crossing and approximately 400 feet west Somerset Blvd	Right	Aerial	8 feet				
1167+00 to 1171+00	Between approximately 400 feet west of Somerset Blvd and Somerset Blvd	Right	At-grade	8 feet				
1173+00 to 1184+50	Between Somerset Blvd and Lakewood Blvd	Right	At-grade	12 feet				
1186+50 to 1216+00	Between Lakewood Blvd and approximately Clark Ave	Right	At-grade	12 feet				
1200+00 to 1215+70	Between approximately 50 feet west of Virginia Ave and Clark Ave	Left	At-grade	12 feet				

Mitigation Monitoring and Reporting Program

Mitigation Measures					Monitoring Action/Procedure ¹	Responsible Party for Implementation	1. Monitoring Responsibility 2. Implementation Phase	Outside Agency/ Organization Coordination
1217+00 to 1222+00	Between Clark Ave and Alondra Blvd	Left	At-grade	10 feet				
1224+00 to 1245+50	Between Alondra Blvd and approximately 200 feet west of Bellflower Blvd	Right	At-grade	8 feet				
1226+50 to 1241+75	Between approximately 220 feet southeast of Alondra Blvd and Orchard Ave	Left	At-grade	8 feet				
1248+50 to 1256+50	Between Bellflower Blvd and approximately 120 feet northwest of Civic Center Dr	Left	At-grade	12 feet				
1250+00 to 1257+50	Between approximately 130 southeast of Bellflower Blvd and Civic Center Dr	Right	At-grade	12 feet				
1257+50 to 1261+50	Between Civic Center Dr and approximately 200 feet southeast of Civic Center Dr	Right	At-grade	8 feet				
1261+00 to 1265+50	Between approximately 500 feet northwest of Cornuta Ave and approximately 130 feet northwest of Cornuta Ave	Left	Aerial	8 Feet				

Mitigation Measures					Monitoring Action/Procedure ¹	Responsible Party for Implementation	1. Monitoring Responsibility 2. Implementation Phase	Outside Agency/ Organization Coordination
1265+50 to 1275+50	Between approximately 130 feet northwest of Cornuta Ave and Woodruff Ave	Left	Aerial	4 feet				
1261+00 to 1276+50	Between approximately 200 feet southeast of Civic Center Dr and Woodruff Ave	Right	Aerial	4 Feet				
1275+50 to 1286+80	Between Woodruff Ave and Flora Vista St	Left	Aerial	8 feet				
1276+50 to 1286+50	Between Woodruff Ave and Flora Vista St	Right	Aerial	10 feet				
1286+80 to 1300+00	Between Flora Vista St and approximately 300 feet southeast of Ripon Ave	Left	At-grade	10 feet				
1286+50 to 1303+00	Between California Ave and SR-91 Fwy	Right	At-grade	10 feet				
1309+00 to 1320+00	Between SR-91 Fwy and approximately 600 feet southeast of San Gabriel River channel	Right	At-grade/Structure	10 feet				
1351+00 to 1360+00	Between approximately 230 feet northwest of Rosewood Park and approximately 450 feet northwest of Harvest Ave	Left	At-grade	12 feet				

Mitigation Monitoring and Reporting Program

Mitigation Measures					Monitoring Action/Procedure ¹	Responsible Party for Implementation	1. Monitoring Responsibility 2. Implementation Phase	Outside Agency/ Organization Coordination
1360+00 to 1372+00	Between approximately 450 feet northwest of Harvest Ave and Harvest Ave	Left	Aerial	12 feet				
1372+00 to 1389+00	Between Harvest Ave and approximately 300 feet northwest of 186th St	Left	Aerial	10 Feet				
1374+80 to 1389+00	Between Gridley Rd and approximately 300 feet northwest of 186th St	Right	Aerial	10 Feet				
1389+00 to 1392+50	Between approximately 300 feet northwest of 186th St and 186th St	Left	At-grade	10 feet				
1389+00 to 1392+00	Between approximately 300 feet northwest of 186th St and 186th St	Right	At-grade	10 feet				
1393+75 to 1397+00	Between 186th St and 187th St	Left	At-grade	10 feet				
1393+40 to 1397+00	Between 186th St and 187th St	Right	At-grade	10 feet				
1397+00 to 1405+50	Between Alburtis Ave and approximately 200 feet northwest of Pioneer Blvd	Left	At-grade	8 feet				

Mitigation Measures					Monitoring Action/Procedure ¹	Responsible Party for Implementation	1. Monitoring Responsibility 2. Implementation Phase	Outside Agency/Organization Coordination
1397+00 to 1405+50	Between Alburtis Ave and approximately 200 feet northwest of Pioneer Blvd	Right	At-grade	8 feet				
1409+50 to 1417+87	Between Pioneer Blvd and South St	Left	At-grade	8 feet				
1409+20 to 1413+60	Between Pioneer Blvd and approximately 350 feet northwest of South St	Right	At-grade	8 feet				
NOI-2 Low Impact Frogs: Low impact frogs (crossing point of two rails) will be installed at the identified locations shown in the following table to reduce crossover impact noise where necessary to reduce noise from light rail trains to below the FTA moderate impact criteria. Locations will be verified during final design with the objective to reduce noise from light rail trains to below the FTA moderate impact criteria.					Review design plans for compliance. Verify in the field.	Construction Contractor/Metro	1. Metro 2. Final Design, Construction, Prior to Operation	Not Applicable
NOI-2 Low Impact Frog Locations								
Civil Station	Location	Noise Clusters	Vibration Clusters					
657+14 to 662+34	Between 55th St and Slauson Ave	N40, N41, N42, N43, N44, N45, N46, N48, N49	V43					
739+92 to 741+32	Between Templeton St and Miles Ave	N74, N75, N76, N77, N78, N79, N80, N81, N349	V63					
807+41 to 808+82	Between Gage Ave and Nevada St	N108, N109, N110, N11, N112, N113	V81					

Mitigation Monitoring and Reporting Program

Mitigation Measures				Monitoring Action/Procedure ¹	Responsible Party for Implementation	1. Monitoring Responsibility 2. Implementation Phase	Outside Agency/ Organization Coordination
873+15 to 874+56	Between Otis Ave and Santa Ana St	N162, N163, N164	V115 and V116				
1004+06 to 1005+47	Between Lincoln Ave and Florence Ave	N187	V153, V154, and V155				
1178+55 to 1179+96	Between Castana Ave and Olivia Ave	N227, N228, N229, N230	V172, V173, V174, and V175				
1188+00	Maintenance and storage facility access track switch east of Lakewood Boulevard	none	V234				
1228+76 to 1230+17	Between Alondra Blvd and Harvard St	N254, N255	V192, V193, and V194				
1289+49 to 1291+03 and 1294+09 to 1295+37	Between Flora Vista St and Park St	N285, N289, N290, N291, N293, N294, N295, N296, N360	V195, V196, V197, and V198				
1394+72 to 1399+92	Between 186th St and 187th St	N328, N330, N331, N332, N334, N336, N337, N338, N339, N340, N341, N342, N343	V217, V218, V221, V222, and V223				
1409+62 to 1414+81	Between Pioneer Blvd and South Ave	N344, N345, N346	V230, V231 and V232				

Mitigation Measures	Monitoring Action/Procedure ¹	Responsible Party for Implementation	1. Monitoring Responsibility 2. Implementation Phase	Outside Agency/ Organization Coordination								
<p>NOI-3 Wheel Squeal Noise Monitoring: Metro will conduct wheel squeal noise monitoring prior to the start of revenue operations to determine if excessive wheel squeal is occurring at the curves identified in the following table. If wheel squeal occurs, Metro will use wayside rail lubrication to lubricate rail surfaces as necessary with the objectives of minimizing wheel squeal and reducing noise from light rail trains to below the FTA moderate impact criteria.</p> <p>NOI-3 Wheel Squeal Wayside Friction Applicator Locations</p> <table border="1"> <thead> <tr> <th>Civil Station</th><th>Curve</th></tr> </thead> <tbody> <tr> <td>670+00</td><td>Curve from Randolph St to Long Beach Ave</td></tr> <tr> <td>788+00</td><td>Curve from San Pedro Subdivision Right-of-Way to Randolph St</td></tr> <tr> <td>1109+00</td><td>Curve from Pacific Electric Right-of-Way to San Pedro Subdivision Right-of-Way following Arthur Ave</td></tr> </tbody> </table>	Civil Station	Curve	670+00	Curve from Randolph St to Long Beach Ave	788+00	Curve from San Pedro Subdivision Right-of-Way to Randolph St	1109+00	Curve from Pacific Electric Right-of-Way to San Pedro Subdivision Right-of-Way following Arthur Ave	<p>Verify wheel squeal noise monitoring is conducted at locations specified.</p> <p>Confirm whether wheel squeal is excessive, and if so, verify implementation of wayside rail lubrication.</p>	Construction Contractor/ Metro	<p>1. Metro 2. Prior to Operation</p>	Not Applicable
Civil Station	Curve											
670+00	Curve from Randolph St to Long Beach Ave											
788+00	Curve from San Pedro Subdivision Right-of-Way to Randolph St											
1109+00	Curve from Pacific Electric Right-of-Way to San Pedro Subdivision Right-of-Way following Arthur Ave											

Mitigation Measures	Monitoring Action/Procedure ¹	Responsible Party for Implementation	1. Monitoring Responsibility 2. Implementation Phase	Outside Agency/ Organization Coordination																
<p>NOI-4 TPSS Noise Reduction: At the traction power substations (TPSS) locations identified in the following table, Metro will implement measures to reduce TPSS noise below the performance criteria shown in the table below. FTA impact criteria shown in the table are based on existing noise levels per FTA guidance. Measures to reduce TPSS noise may include, but are not limited to:</p> <ul style="list-style-type: none"> ▪ Orient cooling fans and heating, ventilation, and air conditioning (HVAC) equipment away from sensitive receivers ▪ Utilize quieter cooling fans or HVAC equipment ▪ Provide a surrounding enclosure around the TPSS unit and HVAC equipment ▪ Install baffles on the exterior of the cooling fan ▪ Sound insulation of TPSS unit enclosure or mounting of sound isolation materials to minimize transformer hum <p>NOI-4 TPSS Locations</p> <table border="1"> <thead> <tr> <th>Civil Station</th><th>TPSS</th><th>Location</th><th>FTA Impact Criteria (dBA, Ldn)</th></tr> </thead> <tbody> <tr> <td>737+75</td><td>15(e)</td><td>East of Stafford Ave and north of Randolph St within private property</td><td>59</td></tr> <tr> <td>1110+50</td><td>7(e2)</td><td>South of Rose Street and just west of Arthur Ave within Metro-owned property</td><td>59</td></tr> <tr> <td>1195+50</td><td>5(e)</td><td>North of Hegel St and south of the Bellflower Bike Trail within private property</td><td>54</td></tr> </tbody> </table> <p>Notes: dBA = A-weighted decibel; FTA = Federal Transit Administration; L_{dn} = day-night noise level; TPSS = traction power substation</p>	Civil Station	TPSS	Location	FTA Impact Criteria (dBA, Ldn)	737+75	15(e)	East of Stafford Ave and north of Randolph St within private property	59	1110+50	7(e2)	South of Rose Street and just west of Arthur Ave within Metro-owned property	59	1195+50	5(e)	North of Hegel St and south of the Bellflower Bike Trail within private property	54	<p>Review design plans for compliance.</p> <p>Verify implementation of identified measures.</p>	Construction Contractor/ Metro	<p>1. Metro 2. Final Design, Construction, Prior to Operation</p>	Not Applicable
Civil Station	TPSS	Location	FTA Impact Criteria (dBA, Ldn)																	
737+75	15(e)	East of Stafford Ave and north of Randolph St within private property	59																	
1110+50	7(e2)	South of Rose Street and just west of Arthur Ave within Metro-owned property	59																	
1195+50	5(e)	North of Hegel St and south of the Bellflower Bike Trail within private property	54																	

Mitigation Measures					Monitoring Action/Procedure ¹	Responsible Party for Implementation	1. Monitoring Responsibility 2. Implementation Phase	Outside Agency/ Organization Coordination
NOI-5 Freight Track Relocation Soundwalls: Soundwalls will be placed at the edge of the right-of-way at the locations identified in the following table to reduce freight and light rail transit noise related to the freight track relocation. Height and length will be verified during final design with the objective to reduce noise from light rail trains to below the FTA moderate impact criteria.					Review design plans for compliance. Verify implementation of identified measures.	Construction Contractor/ Metro	1. Metro 2. Final Design, Construction, Prior to Operations	Not Applicable
NOI-5 Freight Track Relocation Soundwalls								
Civil Station	Location	Track Side	Placement	Height				
764+00 to 769+75	Between State St. and Plaska Ave	Right	At-grade	12 feet				
769+75 to 779+00	Between Plaska Ave and Hollenbeck St	Right	At-grade	10 feet				
1089+50 to 1096+00	Between I-105 Fwy and Happy St	Right	At-grade	14 feet				
1096+00 to 1107+75	Between Happy St and Pacific Electric Right-of-Way	Right	At-grade	16 feet				
1089+50 to 1096+50	Between I-105 Fwy and Pearle St	Left	At-grade	12 feet				
1096+50 to 1104+00	Between Happy St and south of Howe St	Left	At-grade	16 feet				
1104+00 to 1108+50	Between south of Howe St and Pacific Electric Right-of-Way	Left	At-grade	12 feet				
1108+50 to 1120+50	Between Union Pacific Right-of-Way and Colorado Ave	Left	At-grade	14 feet				

Mitigation Measures	Monitoring Action/Procedure ¹	Responsible Party for Implementation	1. Monitoring Responsibility 2. Implementation Phase	Outside Agency/ Organization Coordination
<p>NOI-6 Noise Control Plan: Metro's contractor will develop a Noise Control Plan demonstrating how noise criteria will be achieved during construction. The Noise Control Plan will be designed to follow Metro requirements, Construction Noise Control, and will include measurements of existing noise, a list of the major pieces of construction equipment that will be used, and predictions of the noise levels at the closest noise-sensitive receivers (residences, hotels, schools, churches, temples, and similar facilities). The Noise Control Plan will be approved by Metro prior to initiating construction. Where the construction cannot be performed in accordance with the FTA 1-hour Leq construction noise standards, the contractor will investigate alternative construction measures that will result in lower sound levels. The FTA 1-hour Leq construction noise standards are as follows: Residential daytime standard of 90 dBA Leq and nighttime standard of 80 dBA Leq, and Commercial and Industrial daytime standard of 100 dBA Leq and nighttime standard of 100 dBA Leq. The contractor will conduct noise monitoring to demonstrate compliance with contract noise limits. In addition, Metro will comply with local noise ordinances when applicable. Noise reducing methods that may be implemented by Metro include:</p> <ul style="list-style-type: none"> ▪ If nighttime construction is planned, a noise variance may be prepared by the contractor, if required by the jurisdiction, that demonstrates the implementation of control measures to maintain noise levels below the applicable FTA standards. ▪ Where construction occurs near noise-sensitive land uses, specialty equipment with enclosed engines, acoustically attenuating shields, and/or high-performance mufflers may be used. ▪ Limit unnecessary idling of equipment. ▪ Install temporary noise barriers or noise control curtains, where feasible and desirable. 	Verify development and implementation of Noise Control Plan.	Construction Contractor/ Metro	1. Metro 2. Final Design, Prior to Construction, During Construction	City of Artesia, City of Bell, City of Bellflower, City of Cerritos, City of Cudahy, City of Huntington Park, City of Paramount, City of South Gate, City of Vernon, City of Downey, City of Los Angeles, and the County of Los Angeles, as applicable

Mitigation Measures	Monitoring Action/Procedure ¹	Responsible Party for Implementation	1. Monitoring Responsibility 2. Implementation Phase	Outside Agency/ Organization Coordination
<ul style="list-style-type: none"> ▪ Reroute construction-related truck traffic away from local residential streets and/or sensitive receivers. ▪ Limit impact pile driving where feasible and effective. ▪ Use electric instead of diesel-powered equipment and hydraulic instead of pneumatic tools where feasible. ▪ Minimize the use of impact devices such as jackhammers and hoe rams, using concrete crushers and pavement saws instead. 				
VIB-1 Ballast Mat or Resilient Rail Fasteners: At the locations where exceedance of FTA groundborne vibration impact criteria for frequent events will occur, Metro will isolate trackwork using ballast mats for ballast and tie track and resilient rail fasteners for direct fixation track or other comparable vibration isolation techniques. Locations where mitigation is necessary will be verified during final design, with the objective to reduce vibration levels to below the FTA groundborne vibration impact criteria for frequent events.	Review design plans for compliance. Verify in the field.	Construction Contractor/ Metro	1. Metro 2. Final Design, Construction, Prior to Operation	Not Applicable
VIB-2 Low Impact Frogs: Low impact frogs will be used at the turnout and crossover track locations where exceedance of the FTA impact thresholds has been identified. The locations of low impact frogs required to reduce vibration impacts are identified with Mitigation Measure NOI-2 (Low Impact Frogs). Locations where mitigation is necessary will be verified during final design with the objective to reduce vibration levels to below the FTA groundborne vibration impact criteria for frequent events.	Review design plans for compliance. Verify in the field.	Construction Contractor/ Metro	1. Metro 2. Final Design, Construction, Prior to Operation	Not Applicable

Mitigation Measures	Monitoring Action/Procedure ¹	Responsible Party for Implementation	1. Monitoring Responsibility 2. Implementation Phase	Outside Agency/ Organization Coordination
<p>VIB-3 Vibration Control Plan: Metro's contractor will prepare a Vibration Control Plan demonstrating how the FTA building damage risk criteria and the FTA vibration annoyance criteria will be achieved. The Vibration Control Plan will include a list of the major pieces of construction equipment that will be used and predictions of the vibration levels at the closest sensitive receivers (residences, hotels, schools, churches, temples, historic properties, and similar facilities). The Vibration Control Plan must be approved by Metro prior to initiating construction. Where the construction cannot be performed to meet the FTA vibration damage criteria, the contractor will investigate and implement alternative means and methods of construction measures that will result in lower vibration levels.</p> <p>As part of the Vibration Control Plan, the contractor will prepare a Vibration Monitoring Plan that specifies construction activities requiring monitoring, monitoring locations, warning levels and limits at each location, equipment, procedures, schedule of measurements, and reporting methods to be used to ensure that the FTA damage criteria and the criteria specified in Mitigation Measure VIB-6 (Construction Vibration Limits for Historic Properties/Historical Resources) are not exceeded. Vibration levels will be monitored in real time. If limits are exceeded, the activity causing the exceedance must immediately be halted. Work on that activity will be suspended until such time as alternative construction methods can be used and additional abatement measures can be implemented as specified in the Vibration Control Plan. Vibration monitoring data will be submitted to the Project Engineer weekly.</p>	Verify development and implementation of Vibration Control Plan, inclusive of Vibration Monitoring Plan.	Construction Contractor/ Metro	1. Metro 2. Final Design, Prior to Construction, During Construction	Not Applicable
<p>VIB-4 Minimize the Use of Impact Devices: Metro's contractor will avoid or minimize the use of impact devices such as jackhammers and hoe rams, using concrete crushers and pavement saws instead.</p>	Confirm in construction specifications. Verify in the field.	Construction Contractor/ Metro	1. Metro 2. Prior to Construction, Construction	Not Applicable
<p>VIB-5 Drilling for Building Foundations: Where building foundation systems are needed, drilling instead of driven piles will be used.</p>	Confirm construction specifications. Verify in the field.	Construction Contractor/ Metro	1. Metro 2. Prior to Construction, Construction	Not Applicable

Mitigation Measures		Monitoring Action/Procedure ¹	Responsible Party for Implementation	1. Monitoring Responsibility 2. Implementation Phase	Outside Agency/Organization Coordination
VIB-6 Construction Vibration Limits for Historic Properties/Historical Resources:	Historic structures will be held to the vibration damage criteria identified in the following table. Where possible, operation of the compactor/ballast tamper will be restricted to no closer than 40 feet, and other equipment, such as, and similar to, vibratory rollers, large bulldozers, caisson drills, and hoe rams no closer than 25 feet to a historic structure. Such equipment will not be used within 25 feet of the Bellflower Pacific Electric Railway Depot or the Los Angeles Department of Water and Power Boulder Dam-Los Angeles 287.5 kV Transmission Line towers or within 40 feet of the Frampton-Danterma House (81644 Alburtis Ave, Artesia).	Verify and review construction restrictions in construction plan and/or Vibration Control Plan (Mitigation Measure VIB-3). Verify in field.	Construction Contractor/ Metro	1. Metro 2. Prior to Construction, Construction	Not Applicable
VIB-6 Construction Restrictions near Historic Properties					
APE Map No.	Property Location	Damage Risk Criteria - in/sec (PPV)	Predicted Vibration Level – in/sec (PPV) with Mitigation Measure VIB-6		
17-005	Los Angeles Department of Water and Power Boulder Dam-Los Angeles 287.5 kV Transmission Line (1936)	0.50	0.21 to 0.43 at 25 feet (below damage risk criteria)		
28-008	Bellflower Pacific Electric Railway Depot, 16336 Bellflower Boulevard, Bellflower	0.50	0.21 to 0.43 at 25 feet (below damage risk criteria)		
32-021	81644 Alburtis Ave, Artesia	0.20	0.10 to 0.20 at 40 feet (below damage risk criteria)		
Note: in/sec = inches per second; PPV = peak particle velocity					

Mitigation Measures	Monitoring Action/Procedure ¹	Responsible Party for Implementation	1. Monitoring Responsibility 2. Implementation Phase	Outside Agency/ Organization Coordination
VIB-7 Construction Monitoring for Vibration Near Historic Properties/Historical Resources: The contractor will monitor construction vibration levels within 200 feet of historic buildings and structures to ensure the vibration damage threshold for that building or structure as identified will not be exceeded. A preconstruction and post-construction survey of these buildings will be conducted by a qualified structural engineer. Any damage will be noted. All vibration monitors used for these measurements will be equipped with an “alarm” feature to provide advanced notification that vibration impact criteria have been approached. This measure applies to structures identified as eligible for the National Register of Historic Places and/or California Register of Historical Resources in the <i>West Santa Ana Branch Transit Corridor Project Final Cultural Resources Survey Report – Rev 2</i> (Metro 2023b) and Section 4.14 of the Historic, Archaeological, and Paleontological Resources Section of the Final EIS/EIR.	Verify construction vibration monitoring activities are conducted.	Construction Contractor/ Metro	1. Metro 2. Construction	Not Applicable
Ecosystems/Biological Resources				
BIO-1 Bats: A Bat Habitat Suitability Assessment will be conducted by a qualified bat biologist prior to initiation of construction near areas with the potential to provide bat habitat to determine the potential presence and document suitable locations for bat species. If project construction occurs within the vicinity of suitable habitat for western mastiff bat, pallid bat, silver-haired bat, and big free-tailed bat, a qualified biologist will complete a maternity colony survey during the bat maternity season (June 1 through October 31) to determine the presence or absence of any maternity roosting of bats. If no active roosts are found, then no further action will be required. Mitigation Measures BIO-1a, -1b, and -1c will be implemented, as appropriate if active roosts are found. a. If bats are present, project activities disruptive to the roost within 100 feet of an active maternity roost will be delayed, if feasible, until after the maternity season, or	Verify completion of Bat Habitat Suitability Assessment. Verify completion of maternity colony survey if construction occurs within the vicinity of suitable habitat for western mastiff bat, pallid bat, silver-haired bat, and big free-tailed bat. Verify implementation of identified measures, including preparation of a Bat Relocation Plan, and coordination with CDFW if active roosts are found.	Construction Contractor/ Metro	1. Metro 2. Prior to Construction, Construction	CDFW

Mitigation Measures	Monitoring Action/Procedure ¹	Responsible Party for Implementation	1. Monitoring Responsibility 2. Implementation Phase	Outside Agency/ Organization Coordination
<p>until a qualified biologist determines that the roosting site is no longer in use, or as otherwise determined in coordination with the applicable resource agency. This buffer may be reduced at the discretion of a qualified monitoring biologist. A criterion to be used to evaluate the appropriate maternity roosting site buffer includes existing levels of ambient disturbance.</p> <p>b. If active maternity roosts or hibernacula are found within 100 feet of project construction, the qualified bat biologist will survey (through the use of radio telemetry or other California Department of Fish and Wildlife (CDFW)-approved methods) for nearby alternative maternity colony sites. If the biologist determines in consultation with the CDFW that there are alternative roost sites used by the maternity colony and young are not present, then a Bat Relocation Plan will be prepared by the qualified bat biologist for review and approval by CDFW. Eviction procedures as outlined in a CDFW-approved Bat Relocation Plan will apply. However, if there are no alternative roost sites that can be used by the maternity colony nearby, Mitigation Measure BIO-1c (providing substitute maternity roost nearby) will be required.</p> <p>c. If a maternity roost would be affected by the Project, and no alternative maternity roosts are in use near the site, substitute roosting habitat for the maternity colony will be provided in close proximity to the affected maternity roost no less than three months prior to the eviction of the colony. Alternative roost sites will be constructed in accordance with the specific bat's requirements as detailed in the CDFW-approved Bat Relocation Plan. Alternative roost sites will be of comparable size and proximal in location to the affected colony. Alternate roost sites will remain in place following project construction to provide long-term substitute roosting habitat.</p>				

Mitigation Measures	Monitoring Action/Procedure ¹	Responsible Party for Implementation	1. Monitoring Responsibility 2. Implementation Phase	Outside Agency/ Organization Coordination
<p>BIO-2 Nesting Birds:</p> <p>If project construction occurs within the peak bird breeding season (February 1 through May 31 for raptors, and March 1 through August 31 for passerines) within suitable nesting habitat (e.g., vegetation, bridges, or other structures), a nesting bird and/or raptor preconstruction survey will be conducted by a qualified biologist within the disturbance footprint plus a 300-foot buffer. The survey will occur no more than three days prior to initiation of ground disturbance and/or vegetation removal. If project construction occurs in an area over multiple nesting seasons, a subsequent preconstruction nesting bird and raptor survey may be required prior to the initiation of construction each season. Preconstruction nesting bird and raptor surveys will be conducted during the time of day when birds are active and will be of sufficient duration to reliably conclude the presence or absence of nesting birds and/or raptors on-site and within the designated vicinity. The nesting bird and raptor survey results will be submitted to Metro prior to ground and/or vegetation disturbance activities.</p> <p>If active nests are found, their locations will be flagged. An appropriate avoidance buffer, depending upon the species and the proposed work activity, will be determined by a qualified biologist in consultation with the appropriate regulatory agency. The buffer will be delineated with bright orange construction fencing or other suitable flagging. Active nests will be monitored at a minimum of once per week until it has been determined that the nest is no longer being used by either the young or adults. If project activities must occur within the buffer, they will be conducted at the discretion of the qualified biologist. Inactive nests that have been confirmed by a qualified biologist could be removed based on their recommendations.</p>	<p>Verify completion of nesting bird and/or raptor preconstruction survey if project construction occurs within the peak bird breeding season.</p> <p>Verify implementation of measures, including coordination with applicable resource agencies, if active nests are found.</p>	Construction Contractor/ Metro	<p>1. Metro 2. Prior to Construction, Construction</p>	U.S. Fish and Wildlife Service and/or California Department of Fish and Wildlife, depending on species

Mitigation Measures	Monitoring Action/Procedure ¹	Responsible Party for Implementation	1. Monitoring Responsibility 2. Implementation Phase	Outside Agency/Organization Coordination
<p>BIO-3 Jurisdictional Resources: Impacts associated with permanently disturbed areas within regulated waters will be mitigated in-kind at a minimum ratio of 1:1.</p> <p>Mitigation can be completed by providing adequate funding to a third-party organization, conservation bank, or in-lieu fee program for the in-kind creation or restoration. If mitigation is implemented offsite, mitigation lands should be located in the vicinity of the Affected Area or within the Los Angeles River Watershed. The Affected Area falls within the service area for the Land Veritas Soquel Canyon mitigation bank, which is approved to provide mitigation for permitted impacts under U.S. Army Corps of Engineers 404 permits, Los Angeles Regional Water Quality Control Board 401 Certifications, and California Department of Fish and Wildlife 1600 agreements.</p> <p>Note: the final mitigation ratios required by regulatory agencies during the permitting process may differ from those identified above.</p>	<p>Verify coordination with regulatory agencies.</p> <p>Verify identification, mitigation ratio and implementation of applicable measure(s) for permanent impacts.</p>	Construction Contractor/ Metro	1. Metro 2. Prior to Construction	U.S. Army Corps of Engineers, Los Angeles Regional Water Quality Control Board, and/or California Department of Fish and Wildlife
<p>BIO-4 Protected Trees: Prior to removal of any protected trees (as specified in applicable local ordinances), an Arborist Study will be completed to plot the location of each protected tree that may be encroached upon (i.e., construction activities within the tree protection zone, as measured 5 feet from the canopy dripline), and identify each protected tree proposed to be removed or retained and impacted. The Arborist Study will be prepared by a Certified Consulting Arborist in compliance with local ordinance guidelines and will be prepared in accordance with the reporting requirements of the applicable local jurisdiction. In addition, as required by applicable local jurisdiction ordinances, a tree protection plan will be prepared that will, at a minimum, include site plans, protective tree barriers, the designated tree protection zone (identifying an area sufficiently large enough to protect the tree and its roots from disturbance), activities prohibited or permitted within the tree protection zone, and encroachment</p>	<p>Verify development and implementation of Arborist Study and tree protection plan.</p> <p>Verify submittal of study and plan to applicable local jurisdiction.</p>	Construction Contractor/ Metro	1. Metro 2. Final Design, Prior to Construction	City of Los Angeles, City of Huntington Park, City of Bell, City of South Gate, City of Downey, City of Cerritos, as applicable

Mitigation Measures	Monitoring Action/Procedure ¹	Responsible Party for Implementation	1. Monitoring Responsibility 2. Implementation Phase	Outside Agency/Organization Coordination
boundaries. The Arborist Study and tree protection plan will be submitted to the appropriate departments of local jurisdictions with applicable tree ordinances for approval prior to the start of any tree-disturbing construction activities.				
Hazards and Hazardous Materials				
HAZ-1 Unidentified Oil and Gas Wells: If an unknown oil and gas well is encountered during construction, the contractor will notify Metro, California Division of Occupational Safety and Health, and the California Department of Conservation Geologic Energy Management Division (CalGEM) and proceed in accordance with state requirements. The requirements include written notification to CalGEM, protection of adjacent property, and before commencing any work to abandon any well, obtaining approval by CalGEM. Abandonment work, including sealing off oil and gas bearing units, pressure grouting, etc., must be performed by a state-licensed contractor under the regulatory oversight and approval of CalGEM. Where the Locally Preferred Alternative cannot be adjusted to avoid unidentified abandoned wells, the California Department of Conservation (Department of Oil, Gas, and Geothermal Resources) and a re-abandonment specialty contractor will be contacted to determine the appropriate method of re-abandoning the well. Oil well abandonment must proceed in accordance with California Laws for Conservation of Petroleum and Gas (1997), Division 3. Oil and Gas, Chapter 1. Oil and Gas Conservation, Article 4, Sections 3228, 3229, 3230, and 3232.	Maintain log of construction surveys prior to and during construction. Verify implementation of any identified measures and coordination.	Construction Contractor/ Metro	1. Metro 2. Prior to Construction, Construction	California Division of Occupational Safety and Health, CalGEM, California Department of Conservation (Department of Oil, Gas, and Geothermal Resources), if applicable
Historic, Archaeological, and Paleontological Resources				
CR-1 Development of Cultural Resources Monitoring and Discovery Program Prior to the start of any ground-disturbing activity, an archaeologist that meets the Secretary of Interior's Professional Qualification Standards in Archaeology will prepare and implement a Cultural Resources Monitoring and Discovery Program (CRMDP) for the Project. The CRMDP	Verify development and implementation of CRMDP. Verify inclusion of the requirements of Mitigation Measures CR-2 through CR-4.	Construction Contractor/ Metro	1. Metro 2. Prior to Construction, Construction	Not applicable

Mitigation Measures	Monitoring Action/Procedure ¹	Responsible Party for Implementation	1. Monitoring Responsibility 2. Implementation Phase	Outside Agency/ Organization Coordination
<p>will include the requirements of Mitigation Measures CR-2 through CR-4 and the following:</p> <ul style="list-style-type: none"> ▪ A summary of the results of the <i>West Santa Ana Branch Transit Corridor Project Final Cultural Resources Survey Report—Rev 2</i> and the <i>West Santa Ana Branch Transit Corridor Project Revised Final Cultural Resources Effects Report</i>. ▪ Procedures for avoidance of unanticipated discoveries where possible. ▪ Procedures for preservation in place of unanticipated discoveries where possible. ▪ Provisions of cultural resources awareness training to construction workers that will be implemented as part of Mitigation Measure CR-2 (Archaeological Work Environmental Awareness Program). ▪ Provisions for archaeological and Native American monitoring of ground disturbance related to construction of the Project. ▪ Summary of the treatment procedures for unanticipated discoveries, as specified in Mitigation Measure CR-4 (Treatment of Unanticipated Discoveries). This will include general research questions to be addressed by any studies, field, and laboratory methods for the gathering of data to evaluate sites for the California Register of Historical Resources and/or National Register of Historic Places, and requirements for addressing any sites identified as significant. ▪ Procedures for Native American coordination and input. ▪ Procedures for the treatment of human remains, if applicable, as outlined in existing regulations. These procedures will include, but not be limited to, communication protocol for contacting the coroner and preparation of a human remains treatment plan in consultation with the Most Likely Descendant(s). ▪ Guidelines for the reporting of monitoring and treatment results. 				

Mitigation Measures	Monitoring Action/Procedure ¹	Responsible Party for Implementation	1. Monitoring Responsibility 2. Implementation Phase	Outside Agency/ Organization Coordination
CR-2 Archaeological Worker Environmental Awareness Program: A Secretary of the Interior qualified archaeologist will be retained to prepare a Worker's Environmental Awareness Program training for archaeological sensitivity. This training will be provided to all construction personnel prior to the commencement of any ground-disturbing activities. Archaeological sensitivity training will include a description of the types of cultural material that may be encountered, cultural sensitivity issues, regulatory issues, and the proper protocol for treatment of the materials in the event of a find.	Verify preparation and implementation of Worker's Environmental Awareness Program training for archaeological sensitivity.	Construction Contractor/ Metro	1. Metro 2. Prior to Construction, Construction	Not applicable
CR-3 Archaeological Monitoring: Monitoring pursuant to the Cultural Resources Monitoring and Discovery Program will be supervised by the qualified archaeologist who meets the Secretary of Interior Standards. The duration and timing of the monitoring will be determined by the qualified archaeologist. The archaeological monitor under the direction of a Secretary of the Interior qualified archaeologist will be present during ground-disturbing activities that have the potential to uncover previously known and unknown archaeological resources (i.e., ground-disturbing activities that will extend beyond the limits of prior disturbances). These activities will include, but will not be limited to, pavement removal, grading, and trenching. Activities such as drilling that do not allow for soil visibility during excavation will be spot-checked but will not require a full-time monitor. Monitoring and spot checking will be required up to a depth of 20 feet. If the qualified archaeologist determines that full-time monitoring is no longer warranted, he or she may recommend reducing monitoring to periodic spot checking or cease entirely. Monitoring will be reinstated if any new or unforeseen deeper ground disturbances are required and reduction or suspension of the monitoring will need to be reconsidered by the qualified archaeologist. In the event that an archaeological resource is discovered, the monitor will have the authority to temporarily divert construction equipment around the find with a 50-foot buffer, or other buffer as determined by the archaeologist, to protect the resource	Verify a qualified archaeological monitor has been retained prior to construction. Verify monitoring activities pursuant to the Cultural Resources Monitoring and Discovery Program. Verify consultation with State Historic Preservation Officer and consulting parties, if applicable. Verify development and review of final report that summarizes the results of the archaeological monitoring efforts.	Construction Contractor/ Metro	1. Metro 2. Prior to Construction, Construction, Post Construction	Federal Transit Administration, State Historic Preservation Officer, Consulting tribes

Mitigation Measures	Monitoring Action/Procedure ¹	Responsible Party for Implementation	1. Monitoring Responsibility 2. Implementation Phase	Outside Agency/ Organization Coordination
<p>until it is assessed for significance and treatment (e.g., avoidance, testing, data recovery), if necessary, is determined by the FTA in consultation with the State Historic Preservation Officer and consulting parties and executed.</p> <p>At the conclusion of archaeological monitoring, a final report will be prepared by the Secretary of the Interior qualified archaeologist, or his or her designee, describing the results of the archaeological monitoring efforts associated with the Project. If previously unidentified cultural resources are discovered during construction monitoring, a report will be prepared following the State Historic Preservation Office's Archaeological Resource Management Report Guidelines that document the findings of the field and laboratory analysis and interpret the data within appropriate research context.</p>				
<p>CR-4 Treatment of Unanticipated Discoveries:</p> <p>The contractor or archaeological monitor will notify Metro immediately if potentially significant archaeological resources are exposed during ground-disturbing activities. Archaeological monitors will have the authority to divert or temporarily halt ground-disturbing operations at the discovery. The area will be fenced or flagged as soon as possible following the discovery. Until the boundaries of the resource can be established with testing procedures, a 50-foot buffer zone around the identified deposit will be fenced or flagged off. Subsequent to the identification of site boundaries, the fenced or flagged buffer surrounding the resource could be reduced to a 10- to 15-foot buffer zone at the discretion of the qualified archaeologist. All fencing or flagging of archaeological deposits will be monitored by a qualified archaeologist. Temporary fencing or flagging will remain in place until the resource has been released by the qualified archaeological monitor, in consultation with Metro and FTA. Construction activities may continue in areas beyond the buffer zones. The discovery will be evaluated by the qualified archaeologist in accordance with the methods identified in the Cultural Resources Monitoring and</p>	<p>Verify in the field that a qualified archaeologist is monitoring the site during ground-disturbing activities. Verify notification and implementation of methods identified in the Cultural Resource Monitoring and Discovery Plan. Verify development and implementation of treatment plan, inclusive of consultation, if an archaeological resource is eligible for the NRHP and/or CRHP.</p>	<p>Construction Contractor/ Metro</p>	<p>1. Metro 2. Construction</p>	<p>FTA, State Historic Preservation Officer</p>

Mitigation Measures	Monitoring Action/Procedure ¹	Responsible Party for Implementation	1. Monitoring Responsibility 2. Implementation Phase	Outside Agency/ Organization Coordination
Discovery Program (Mitigation Measure CR-1) to determine if the archaeological resource is eligible for listing on the National Register of Historic Places (NRHP) and/or California Register of Historic Resources (CRHR). If the archaeological resource is determined eligible for the NRHP and/or CRHR, a treatment plan, will be prepared in accordance with 36 Code of Federal Regulations § 800.13(a)(2) in consultation with the State Historic Preservation Officer.				
PR-1(a) Paleontological Resources Mitigation and Monitoring Program: Prior to the commencement of ground-disturbing activities for the Locally Preferred Alternative (LPA), Metro will retain a qualified professional paleontologist to prepare and implement a Paleontological Resources Mitigation and Monitoring Program (PRMMP) for the LPA. The qualified paleontologist (principal paleontologist) must have at least a Master's degree or equivalent work experience in paleontology, will have experience with local paleontology, and will be familiar with paleontological procedures and techniques. The PRMMP will describe mitigation requirements to be consistent with the Society of Vertebrate Paleontology (SVP) standards for paleontological resources mitigation (SVP 2010). The PRMMP will include at a minimum the following: 1) Geologic setting, including paleontological sensitivity of the LPA site 2) Description of the LPA, outlining the type and extent of ground disturbance 3) Specifications for what ground-disturbing activity requires paleontological monitoring 4) Paleontological monitoring procedures: a. qualifications of paleontological monitors b. timing and duration of monitoring c. required data collection procedures d. daily monitoring log content	Verify a qualified paleontologist has been retained. Verify preparation and implementation of PRMMP.	Construction Contractor/ Metro	1. Metro 2. Prior to ground-disturbing construction activities, Construction	Not Applicable

Mitigation Measures	Monitoring Action/Procedure ¹	Responsible Party for Implementation	1. Monitoring Responsibility 2. Implementation Phase	Outside Agency/ Organization Coordination
<p>5) Communication protocols to be followed in the event that an unanticipated fossil discovery is made during development of the LPA</p> <p>6) Construction diversion and resource recovery protocols:</p> <ul style="list-style-type: none"> a. authority for ceasing construction. b. aerial extent of avoidance (construction exclusion) for any discovery c. timing to evaluate and recover the fossil <p>7) Fossil collection and preparation standards (field and museum)</p> <p>8) Curation standards including appropriate institutions, curation agreements, and deadlines for materials to be accessioned</p> <p>9) Post-recovery reporting requirements</p>				
<p>PR-1(b) Paleontological Worker Environmental Awareness Program: Prior to the start of construction, the qualified paleontologist or his or her designee will conduct training for construction personnel regarding the appearance of fossils and the procedures for notifying paleontological staff should fossils be discovered by construction staff. The Paleontological Worker Environmental Awareness Program will be fulfilled at the time of a preconstruction meeting. In the event of a fossil discovery by construction personnel, all ground-disturbing activities within 50 feet of the find will be halted, a 50-foot exclusion zone around the find will be established, and the qualified paleontologist and/or designee will be contacted to evaluate the find before restarting work in the exclusion zone. If the qualified paleontologist determines that the fossil(s) is (are) scientifically significant, the qualified paleontologist will complete the conditions outlined in Mitigation Measure PR 1(c) and PR 1(d) to mitigate impacts to significant fossil resources.</p>	<p>Verify the development and implementation of a Paleontological Worker Environmental Awareness Program.</p> <p>Verify implementation of Mitigation Measure PR 1(c) and PR 1(d).</p>	Construction Contractor/ Metro	<p>1. Metro</p> <p>2. Prior to ground-disturbing construction activities</p>	Not Applicable
<p>PR-1(c) Construction Monitoring: Ground-disturbing construction activities (including grading, excavation, and trenching) that have the potential to impact previously undisturbed (i.e., native) sediments or geologic units of high paleontological sensitivity below 5 feet below ground surface will be monitored on a full-time basis by a</p>	<p>Verify monitoring activities pursuant to the Paleontological Mitigation and Monitoring Program.</p>	Construction Contractor/ Metro	<p>1. Metro</p> <p>2. Construction</p>	Not Applicable

Mitigation Measures	Monitoring Action/Procedure ¹	Responsible Party for Implementation	1. Monitoring Responsibility 2. Implementation Phase	Outside Agency/ Organization Coordination
<p>qualified paleontological monitor during initial ground disturbance. Monitoring pursuant to the Paleontological Mitigation and Monitoring Program will be supervised by the qualified paleontologist and will be conducted by a monitor who meets or exceeds the Society of Vertebrate Paleontology (2010) requirements for a qualified paleontological monitor, including at least a Bachelor's degree in geology, paleontology, or related field, and experience with collection and salvage of paleontological resources. If geological evidence indicates that sediments are younger alluvium or previously disturbed sediments and have a low potential to yield paleontological resources, or if older sediments are determined not to be fossiliferous based on results of monitoring at this location, the qualified paleontologist may determine that full-time monitoring is no longer warranted and may recommend reducing monitoring to periodic spot checking or cease entirely. Monitoring will be reinstated if any new or unforeseen deeper ground disturbances are required and reduction or suspension of the monitoring will need to be reconsidered by the qualified paleontologist. Ground-disturbing activity that reaches a depth of less than 5 feet below ground surface will not require paleontological monitoring.</p> <p>In the event that a paleontological resource is discovered, the monitor will have the authority to temporarily divert the construction equipment around the find until it is assessed for scientific significance and collected. Typically, fossils can be safely recorded and, if significant, potentially collected quickly by a single paleontologist without disrupting construction activity. In some cases, larger fossils (such as complete skeletons or large mammal fossils) may require more extensive excavation and longer recovery periods. In such a case, the monitor, under the supervision of the principal paleontologist, will have the authority to temporarily direct, divert, or halt construction activity so that the fossil(s) can be removed in a safe and timely manner.</p>				

Mitigation Measures	Monitoring Action/Procedure ¹	Responsible Party for Implementation	1. Monitoring Responsibility 2. Implementation Phase	Outside Agency/ Organization Coordination
<p>PR-1(d) Preparation and Curation of Recovered Fossils: Once recovered, significant fossils will be identified to the lowest possible taxonomic level, prepared to a curation ready condition, and curated at a scientific institution with a permanent paleontological collection (such as the Natural History Museum of Los Angeles County) along with all pertinent field notes, photos, data, and maps. Fossils of undetermined significance at the time of collection may also warrant curation at the discretion of the qualified paleontologist. The cost of curation is assessed by the repository and will be the responsibility of Metro.</p> <p>At the conclusion of all required monitoring, laboratory work, and museum curation, the qualified paleontologist will prepare a final report describing the results of the paleontological mitigation monitoring efforts associated with the Locally Preferred Alternative. The report will include a summary of the field and laboratory methods, an overview of the project geology and paleontology, a list of taxa recovered (if any), an analysis of fossils recovered (if any) and their scientific significance, and recommendations. If the monitoring efforts produced fossils, then a copy of the report will also be submitted to the designated museum repository and to Metro.</p>	<p>Verify the preparation and curation of recovered fossils is completed if significant fossils are recovered.</p> <p>Verify development and review of final report that summarizes the results of the paleontological mitigation monitoring efforts.</p>	Construction Contractor/ Metro	1. Metro 2. Construction, Post construction	Scientific institution, if applicable
Tribal Cultural Resources				
<p>TCR-1 Native American Monitoring: Because of the potential to encounter previously undocumented Traditional Cultural Properties and/or Tribal Cultural Resources, a Native American monitor will be retained by the Los Angeles County Metropolitan Transportation Authority to monitor project-related, ground-disturbing construction activities (e.g., grading, excavation, drilling, trenching) that occur within areas that are identified as having a moderate-to-high potential for containing prehistoric Native American remains, as specified in the Cultural Resources Monitoring and Discovery Plan (CRMDP), as described in Mitigation Measure CR-1 (Development of Cultural Resources Monitoring and</p>	<p>Verify a Native American monitor has been retained.</p> <p>Verify in the field that a Native American monitor is monitoring the site during ground-disturbing activities per the CRMDP.</p>	Construction Contractor/ Metro	1. Metro 2. Prior to Construction, Construction	Consulting tribes, if applicable

Mitigation Measures	Monitoring Action/Procedure ¹	Responsible Party for Implementation	1. Monitoring Responsibility 2. Implementation Phase	Outside Agency/Organization Coordination
<p>Discovery Program). The appropriate Native American monitors will be selected based on the tribal consultation under Assembly Bill 52 and Section 106. Monitoring staff will be identified in the CRMDP. Monitoring procedures and the role and responsibilities of the Native American monitor will be outlined in the CRMDP. In the event that the Native American monitor identifies a cultural resource of Native American origin during construction, the monitor will be given the authority to temporarily halt ground-disturbing activities (if safe) within 50 feet (15 meters) of the discovery to investigate the find and contact the Project Archaeologist and Metro. The Native American monitor and consulting tribe(s) will be provided an opportunity to participate in the documentation and evaluation of the find and development of treatment, as necessary.</p>				
<p>TCR-2 Unanticipated Discovery of Traditional Cultural Properties/Tribal Cultural Resources: In the event that cultural resources of Native American origin are identified during construction, all earth-disturbing work within a 50-foot radius of the find will be temporarily suspended or redirected until an archaeologist has evaluated the nature and significance of the find and an appropriate Native American representative, based on the nature of the find, is consulted. The specific procedures to be followed in the event of an unanticipated discovery of cultural resources of Native American origin will be identified in the Cultural Resources Monitoring and Discovery Plan, as described in Mitigation Measure CR-1 (Development of Cultural Resources Monitoring and Discovery Program). If Metro determines that the resource is a Traditional Cultural Property and/or Tribal Cultural Resource and is found significant under CEQA/Section 106, a treatment plan will be prepared and implemented in accordance with state guidelines and in consultation with Native American groups as described below.</p> <p>The treatment plan will be developed by a Secretary of the Interior qualified archaeologist in consultation with the State Historic Preservation Officer (SHPO) and with Native</p>	<p>Verify notification and implementation of methods identified in the Cultural Resources Monitoring and Discovery Plan. Verify development and implementation of a treatment plan, if applicable.</p>	Construction Contractor/ Metro	1. Metro 2. Construction	SHPO, FTA, Native American groups, as applicable

Mitigation Measures	Monitoring Action/Procedure ¹	Responsible Party for Implementation	1. Monitoring Responsibility 2. Implementation Phase	Outside Agency/ Organization Coordination
<p>American contacts, as applicable. Metro will be responsible for ensuring that the treatment plan is developed and consultation with stakeholders (e.g., tribes, SHPO) is completed. The treatment plan will be developed to ensure treatment of archaeological historic properties/historical resources meets the Secretary of the Interior's Standards and Guidelines for Archaeological Documentation, the California Office of Historic Preservation's Archaeological Resources Management Report, Recommended Contents and Formats (1989), the Guidelines for Archaeological Research Design (1991), the Advisory Council on Historic Preservation's publication Treatment of Archaeological Properties: A Handbook, and the Department of the Interior's Guidelines for Federal Agency Responsibility under Section 106 of the National Historic Preservation Act.</p> <p>The treatment plan will include the following: procedures required should archaeological historic properties/historical resources be determined to no longer be extant, methods for avoidance should avoidance be determined feasible upon discovery, and Phase III data recovery methods in the event that avoidance is infeasible. Phase III data recovery methods within the treatment plan would include, but not be limited to, research questions to be addressed by the study of each site, a description of methods including excavation methods, data analysis, reporting requirements, and final disposition of recovered materials. Phase III data recovery methods will also identify the thresholds at which point data redundancy is achieved. Phase III data recovery will ensure each site is adequately documented in accordance with the Secretary of the Interior's Standards for the Treatment of Historic Properties. The treatment plan will be implemented when a determination is made that a property/resource cannot be avoided and will be adversely affected/significantly impacted by the Project.</p>				

Mitigation Measures	Monitoring Action/Procedure ¹	Responsible Party for Implementation	1. Monitoring Responsibility 2. Implementation Phase	Outside Agency/Organization Coordination
Parklands and Community Facilities				
LU-1	Refer to LU-1	Refer to LU-1	Refer to LU-1	Refer to LU-1
COM-1	Refer to COM-1	Refer to COM-1	Refer to COM-1	Refer to COM-1
NOI-6	Refer to NOI-6	Refer to NOI-6	Refer to NOI-6	Refer to NOI-6
VIB-3 through VIB-7	Refer to VIB-3 through VIB-7	Refer to VIB-3 through VIB-7	Refer to VIB-3 through VIB-7	Refer to VIB-3 through VIB-7
Safety and Security				
SAF-1 Encroachment Detection: Subject to coordination with the applicable stakeholders, the Locally Preferred Alternative will incorporate a means of encroachment detection along the portion of the corridor that shares right-of-way with freight operations. The encroachment detection system will detect unauthorized entry into Metro right-of-way, such as a freight train derailment. Prior to the start of service, Metro will develop a plan that outlines procedures should the encroachment detection system be triggered. In the event the intrusion detection system detects a possible derailment, all parties operating in the shared right-of-way corridor will be notified and train traffic (freight and light rail transit) will not be permitted to enter the area until the detection is investigated and the intrusion, if any, addressed to avoid possible derailments.	Verify coordination with applicable stakeholders (i.e., freight operators) to identify encroachment detection. Verify incorporation of encroachment detection system along the portion of the corridor that shares right-of-way with freight operations, including verifying on design plans. Verify development of a plan that outlines procedures if the encroachment detection system is triggered.	Construction Contractor/Metro	1. Metro 2. Final Design, Construction, Prior to Operation	Applicable freight operators
SAF-2 School District Coordination: Metro will coordinate with and notify the school districts and individual school administrators to maintain or modify safe and convenient pedestrian, bicycle, and bus routes to schools as necessary during and after construction. This also includes the publication and distribution of alternative pedestrian and bicycle route maps.	Verify coordination with and notification of school districts and individual school administrators.	Construction Contractor/Metro	1. Metro 2. Prior to Construction, Construction, After Construction	Local school districts and school administrators

Mitigation Measures	Monitoring Action/Procedure ¹	Responsible Party for Implementation	1. Monitoring Responsibility 2. Implementation Phase	Outside Agency/ Organization Coordination
SAF-3 Construction Site Measures: Metro's contractor will provide safety and security measures at the construction sites and staging areas. Security measures will include barriers for excavations, installation of temporary barriers around perimeters, security patrols, and appropriate signage and lighting. The contractor will provide a safety and security plan to Metro for review prior to the start of construction.	Verify development and implementation of safety and security measures at construction sites and staging areas. Verify in field. Verify development and implementation of a safety and security plan.	Construction Contractor/ Metro	1. Metro 2. Prior to Construction, Construction	Not Applicable

Source: TAHA and WSP 2024

Note: ¹Verification of Monitoring Action includes documentation to the project file that the identified measure is complete and has been implemented. It may be in the form of conformed as-built plans, field logs, measurements, photographs, approved plans, correspondence with third parties, copies of approved permits, or similar.

Table 2 includes all project measures identified in the Final EIS/EIR. Project measures are incorporated as part of the Project and consist of design features, best management practices, or other measures required by law and/or permit approval that avoid or minimize potential effects. Although the project measures are not mitigation measures, they are included in the MMRP as they are enforceable requirements of the Project to be implemented.

Table 2. Project Measures

Project Measures	
Transportation	
TR PM-1 Pre-signals and Queue-cutter Signals: Installation of pre signals or queue cutter signals to discourage vehicles from stopping on tracks. Pre-signals are traffic control devices that control traffic approaching a grade crossing in conjunction with the traffic control for the intersection(s) beyond the tracks. Pre-signals can be used to stop vehicular traffic before the railroad crossing. Queue-cutter signals only control traffic approaching a crossing and are operated independently of other traffic signals in the vicinity. The concept of operation of a queue-cutter is to hold traffic upstream from a crossing before a queue caused by a downstream traffic control signal or other roadway congestion can grow long enough to back up into the crossing.	
TR PM-2 Lane Configurations: Existing lane configurations near the at-grade crossings will be modified to operate the pre signals or queue cutter signals as required by regulations.	
TR PM-3 Randolph Street Intersection Modifications: Intersection modifications along Randolph Street to close access for vehicles to cross the existing train tracks, resulting in the removal of the existing at grade train crossing at the following intersections: <ul style="list-style-type: none"> ▪ Wilmington Avenue ▪ Regent Street ▪ Malabar Street ▪ Rita Avenue ▪ Arbutus Avenue 	
TR PM-4 Randolph Avenue Intersection Modifications: Intersection modifications along Randolph Street Lane Reduction. Randolph Street will be reduced from two lanes in each direction to one lane in each direction between Alameda Street (West) and State Street and left-turn lanes will be provided along Randolph Street at each middle-of-intersection at-grade crossing to accommodate existing on-street parking. Specifically, left-turn lanes will be added at the following cross streets: <ul style="list-style-type: none"> ▪ Alameda Street (West): Add northbound left-turn lane ▪ Santa Fe Avenue: Add northbound left-turn lane Left turns will be prohibited at the following cross streets along Randolph Street: <ul style="list-style-type: none"> ▪ Santa Fe Avenue: Southbound left turns ▪ Pacific Boulevard: Northbound left turns ▪ Miles Avenue: Southbound left turns ▪ State Street: Northbound left turns 	

Project Measures

TR PM-5:

The Atlantic Avenue/Azalea West intersection will be converted from a three-legged intersection to a four-legged intersection. The added intersection leg will be aligned with the Firestone Station parking area entrance/exit driveway.

TR PM-6:

One-way street conversion to Dakota Avenue between Gardendale Street and Main Street to accommodate the LRT tracks.

TR PM-7:

The MSF entrance/exit driveway will be aligned with Somerset Boulevard at Bayou Avenue and a traffic signal will be installed at the intersection.

TR PM-8 Alondra Boulevard Intersection Modifications:

Intersections adjacent to the Alondra Boulevard at-grade train crossing will be modified. The intersections are Alondra Boulevard at Flora Vista Street and Alondra Boulevard at Pacific Avenue. Right-turn access only entering Flora Vista Street and right-turn only entering and leaving Pacific Avenue is required to accommodate crossing features required by regulations. Additionally, a traffic signal and southbound dedicated left-turn lane will be installed at the intersection of Clark Avenue and Los Angeles Street.

TR PM-9:

187th Street between Corby Avenue (West) and Corby Avenue (East) will be closed to minimize the number of at-grade crossings. With the design option, 186th Street instead of 187th Street will be closed between Corby Avenue (West) and Corby Avenue (East).

TR PM-10:

188th Street between Corby Avenue (West) and Pioneer Boulevard will be closed to accommodate the Pioneer Station parking structure.

TR PM-11 Pioneer Station Parking Access:

Vehicle access to the Pioneer Station parking structure will be directed by signage to occur primarily from Pioneer Boulevard. The Pioneer Boulevard entrance/exit driveway will be aligned with the Solana Place driveway and a traffic signal will be installed. Corby Avenue will serve as a secondary entrance/exit point as required, limiting vehicle access to/from adjacent residential streets.

Visual and Aesthetics

VA PM-1 Design Standards:

LPA components, including but not limited to track alignment, auxiliary facilities, parking facilities, and MSF site options, will be designed per MRDC, Metro's Systemwide Station Design Standards, and Standard/Directive Drawings, or equivalent.

VA PM-2 Public Art:

Public art will be installed at station areas and will follow MRDC or equivalent, Metro's Systemwide Station Design Standards, and Metro Art Program Policy.

VA PM-3 Landscaping:

New landscaping will be installed consistent with MRDC and Systemwide Station Design Standards, or equivalent.

VA PM-4 Landscaping Screening:

TPSSs in residential areas would be landscaped or incorporate design features to screen or improve the appearance of structures.

VA PM-5 Landscaping at MSF Site:

At the MSF site, existing landscaping and barriers facing residential areas will either remain in place or will be replaced with other types of landscaping and barriers that will obstruct views of the MSF site from residential areas.

VA PM-6 Local Zoning Ordinances:

Project elements that are located on properties outside of the rail ROW and public ROW would adhere to local zoning ordinances.

Project Measures

VA PM-7 Lighting:

Operational lighting would be consistent with MRDC or equivalent. Lighting would be directed away from surrounding properties.

VA PM-8 Residential Screening for Aerial Structures:

Where aerial structures will be situated adjacent to the rear of residential properties in the Cities of Paramount, Bellflower, Cerritos, and Artesia and the height of the soundwalls (Mitigation Measure NOI-1) on top of the aerial structures will be less than eight feet, a vertical screening element will be placed at the top of the soundwalls on the aerial structures to block the line-of-sight between the LRT vehicles on the aerial structures and the rear yards of adjacent residential properties. The combined height of the vertical screening element and soundwall will be at least eight feet.

Air Quality

AQ PM-1 Metro Green Construction Policy:

LPA construction activities will be conducted in compliance with the Metro Green Construction Policy and will implement Best Management Practices contained therein as practicable.

Noise and Vibration

NOI PM-1 Crossing Signal Bells:

Crossing signal bell noise will not exceed 75 dBA Lmax sound exposure level at 10 feet at all protected at-grade crossings. Crossing signal bells at the locations identified in the following table, will be equipped with shrouds to direct bell noise away from residential sensitive receivers. This measure has been coordinated with CPUC but remains subject to its final approval.

NOI PM-1 Crossing Signal Bells Shroud Locations

Grade Crossing Locations	
Albany St	Century Blvd
Santa Fe Ave	Somerset Blvd
Rugby Ave	Clark Ave
Seville Ave	Alondra Blvd
Miles Ave	186th St
Bell Ave	Pioneer Blvd
Otis Ave	—

Project Measures

NOI PM-2 Gate-Down-Bell-Stop Variance:

Metro will apply for a gate-down-bell-stop variance at the locations identified in the following table to reduce the duration of bell ringing and therefore reduce impacts at residential sensitive receivers. Crossing signal noise will not exceed 30 seconds in duration. This measure has been coordinated with CPUC but remains subject to its approval.

NOI PM-2 Gate-Down-Bell Stop Variance Locations

Grade Crossing Locations	
Albany St	Century Blvd
Santa Fe Ave	Somerset Blvd
Rugby Ave	Clark Ave
Seville Ave	Alondra Blvd
Miles Ave	186th St
Bell Ave	Pioneer Blvd
Otis Ave	–

VIB PM-1 City of Bellflower Vibration Sensitive Facilities:

As part of project construction, Metro will establish a requirement that in no case shall vibration levels, in any direction, for all construction activities, exceed 2.0 in/sec PPV at the location of the City of Bellflower High Capacity Well No. 1 to protect underground and at-grade utility structures or exceed 0.5 in/sec PPV at the location of Dante Valve Company to protect the facility and at-grade test equipment. Vibratory rollers and other vibration-causing construction equipment shall not be used within 15 feet of the wellhead or Dante Valve Company facility.

Ecosystems/Biological Resources

BIO PM-1 Invasive Plant Species Best Management Practices:

The following are options that Metro may consider to control the spread of invasive plant species during construction:

- Prior to construction, a qualified botanist/biologist will provide invasive plant prevention training and an appropriate identification/instruction guide to staff and contractors. A list of target species will be included, along with measures for early detection and eradication.
- A qualified botanist/biologist will monitor the project site immediately prior to and during construction to identify the presence of invasive weeds and recommend measures to avoid their inadvertent spread in association with the Project. Such measures may include inspection and cleaning of construction equipment and use of eradication strategies.
- All disturbed areas that are not converted to hardscape or formally landscaped will be hydro-seeded with a mix of locally native species upon completion of work in those areas. In areas where construction is ongoing, hydro-seeding will occur where no construction activities have occurred prior to winter rains. If invasive species invade these areas prior to hydro-seeding, weed removal will occur in consultation with a qualified botanist/ biologist. Alternatively, in areas not suitable for hydro-seeding, areas that are not hardscaped and are planned for formal landscaping will be mulched to reduce the potential for invasive species to colonize. Mulch will be at least 4 inches thick and will be weed free.

BIO PM-2 Prohibition of Invasive Plant Species in Landscape Plans:

The use of species listed in the California Invasive Plant Council Invasive Plant Inventory in project landscape planting plans will be prohibited.

Project Measures

BIO PM-3 LA Metro Tree Policy:

The Project will adhere to the LA Metro Tree Policy, adopted on October 27, 2022. The policy requires the preparation of a tree protection plan identifying tree protection zones for trees designated for retention. Where tree removal is required, a plan will be prepared that either replaces removed trees at a ratio of 2:1 or replaces in-kind with trees that are a minimum size of 36-inch standard box (i.e., young trees with a large root ball). The policy also requires engagement with representatives of local jurisdictions and community stakeholders prior to selecting the appropriate species and location for replacement trees.

Geotechnical, Subsurface, and Seismic

GEO PM-1 Geotechnical Design (Operation):

A number of geotechnical design reports are required for the Project, as detailed in the MRDC, Section 5.6, Geotechnical Investigations, Analysis and Design. Section 5.6 of the MRDC provides detailed requirements for planning and conducting a geotechnical investigation, geotechnical design methodologies, and reporting. In addition, and as referenced in the MRDC, Caltrans and the County of Los Angeles Building Code have their own design requirements for bridges and aerial structures (Caltrans) and building structures (County of Los Angeles) that are required.

In accordance with the MRDC, geotechnical report recommendations will be incorporated into the project plans and specifications. These recommendations will be a product of the LPA design process and will address the subsurface hazards identified in this report. Without these report recommendations, the project plans and specifications will not be approved, and the LPA will not be allowed to advance into the final design stage or ultimately into construction. As a part of the Project, Metro has developed a comprehensive geotechnical field investigation and laboratory testing program (Metro 2020c) and is in the process of implementing the program. Findings from that program will be used to verify the information presented in the Final EIS/EIR.

GEO PM-2 Geotechnical Design (Construction):

A number of geotechnical design reports are required for the LPA, as detailed in the MRDC, Section 5.6, Geotechnical Investigations, Analysis, and Design. Section 5.6 of the MRDC provides detailed requirements for planning and conducting a geotechnical investigation, geotechnical design methodologies, and reporting. In addition, and as referenced in the MRDC, Caltrans and the County of Los Angeles Building Code have their own design requirements for bridges and aerial structures (Caltrans) and building structures (County of Los Angeles) that are also required.

In accordance with the MRDC, geotechnical report recommendations will be incorporated into the LPA plans and specifications. These recommendations will be a product of the LPA design process and will address the subsurface hazards identified in this report. The design reports will also provide recommendations to be implemented during construction. The construction recommendations will address temporary excavations and ground settlement, and oil and gas hazards, and will include construction monitoring plans specific to the LPA. Implementation of the recommendations and monitoring plans will be required, as applicable, for both on-site and off-site properties and existing improvements that could be affected by an excavation.

Without these construction recommendations, the LPA plans and specifications will not be approved and the LPA will not be allowed to advance into the final design stage nor ultimately into construction. As a part of the LPA, Metro has developed a comprehensive geotechnical field investigation and laboratory testing program and is in the process of implementing the program. Findings from that program will be used to verify the information presented in the Final EIS/EIR.

Project Measures		
Hazards and Hazardous Materials		
HAZ PM-2 Disposal of Groundwater (Operation):	<p>If disposal of contaminated groundwater is required during operation of the LPA, (decontamination water, purge water, dewatering, etc.), the LARWQCB will be consulted and Metro will comply with permits as required by the LARWQCB. LARWQCB may require that an individual National Pollutant Discharge Elimination System (NPDES) permit and/or waste discharge requirements (WDR) be obtained for dewatering and discharge activities. Additionally, the following agencies will be contacted as needed:</p> <ul style="list-style-type: none"> ▪ City of Los Angeles Sanitation will be notified if contaminated groundwater will be discharged to the sewer system. ▪ City of Vernon Health and Environmental Control Department will be contacted if contaminated groundwater will be discharged to the stormwater system. ▪ County of Los Angeles Department of Public Health will be contacted if contaminated groundwater is encountered during dewatering within the boundaries of the following cities: Huntington Park, Bell, Cudahy, South Gate, Downey, Paramount, Bellflower, Cerritos, Artesia, and the unincorporated community of Florence-Firestone. <p>The groundwater discharge and disposal requirements vary by agency, location, concentration, and contaminants of concern and are therefore developed in consultation with the agency and the project proponent.</p>	
HAZ PM-3 Contaminated Soil, Soil Vapor, and Groundwater (Operation):	<p>Prior to the start of operation of the LPA, the operator will retain a qualified environmental consultant to prepare a Soil Management Plan, Soil Vapor Management Plan (and/or Landfill Gas Accumulation Management Plan), Soil Reuse Management Plan, and Groundwater Management Plan or a combined Soil, Soil Vapor, Soil Reuse, and Groundwater Management Plan to address the possibility of encountering contaminated soil, soil vapor, and groundwater during operation. These plans will be completed to Metro's contractor specifications and submitted to Metro prior to operation and any ground-disturbing activities for the LPA.</p> <p>Depending on the overall design of the LPA, contaminated soil, soil vapor, and/or groundwater may be encountered during normal operation of the LPA (dewatering or soil vapor venting) or during repairs and maintenance along the alignment that involve disturbance of soil, soil vapor, or groundwater (trenching, potholing, and utility repairs).</p> <p>The Soil and Soil Vapor Management Plans (and/or Landfill Gas Accumulation Management Plan) must establish provisions per Metro's contractor specifications for the disturbance of contaminated materials (known and undocumented). Proper management and disposition of contaminated soils will be determined in consultation with appropriate regulatory agencies and in accordance with applicable federal and/or state guidance (USEPA, DTSC, RWQCB, and other local agencies).</p> <p>The Soil Reuse Management Plan must establish provisions per Metro's contractor specifications for the reuse of contaminated known or undocumented soils. Proper management and disposition of contaminated soils will be determined in consultation with appropriate regulatory agencies and in accordance with applicable federal and/or state guidance (USEPA, DTSC, RWQCB, and other local agencies).</p> <p>The Groundwater Management Plan must establish provisions per Metro's contractor specifications for encountering and managing contaminated groundwater (known and undocumented). Proper disposal of contaminated groundwater will be determined in consultation with appropriate regulatory agencies and in accordance with applicable federal and/or state guidance (USEPA, DTSC, RWQCB, and other local agencies).</p> <p>Where open or closed regulatory release cases are already managed by a regulatory agency (e.g., USEPA, DTSC, RWQCB) and Metro's operation involves plans to alter the use of the site and/or disturb contaminated soil and/or groundwater onsite, Metro will notify the regulatory agency of the planned land use changes prior to ground-disturbing activities at the location of the open or closed regulatory release site. The regulatory agency will determine the level of investigation and/or remediation (performance standards) necessary on a case-by-case basis. A closure or no further action determination letter from the regulatory agency will be obtained when investigation and/or remediation is complete.</p>	

Project Measures

HAZ PM-4 Handling, Storage, and Transport of Hazardous Materials or Wastes:

Prior to the start of construction, the contractor will provide Metro with an industrial waste management plan and/or a waste and hazardous materials management plan, such as a plan defined in Title 19 CCR or a Spill Prevention, Control, and Countermeasure Plan. These plans will be completed to Metro contractor specifications and will identify the responsible parties and outline procedures for hazardous waste and hazardous materials handling, storage, and transport during construction. The plan will specify how the contractor will handle and manage wastes on-site, including the following:

- Prescribe BMPs to follow to prevent hazardous material releases and cleanup of any hazardous material releases that may occur
- Comply with the SWRCB Construction CWA Section 402 General Permit conditions and requirements for transport, labeling, containment, cover, and other BMPs for storage of hazardous materials during construction (SWRCB 2017)

During construction, the contractor will comply with applicable federal and state regulations that consider hazardous material handling and storage practices, such as the Resource Conservation and Recovery Act, the Comprehensive Environmental Response and Compensation Liability Act, the Hazardous Materials Release Response Plans and Inventory Law, and the Hazardous Waste Control Act.

HAZ PM-5 Property Assessment – Phase I and II ESAs:

Consistent with Metro's standard practice, prior to the start of construction, the contractor must provide Phase I ESAs in accordance with standard ASTM methodologies to assess the land use history of each parcel that will be acquired/utilized for the LPA, including the railroad corridor properties. The determination of parcels that require a Phase II ESA (i.e., soil, groundwater, soil vapor subsurface investigations) will be evaluated after the Phase I ESAs have been completed and will be based on the results of the Phase I ESAs. Specifically, if the Phase I ESAs identify suspected contamination in the soil, soil vapor, or groundwater, a Phase II ESA will be conducted to determine whether the suspect contamination resulted in soil, groundwater, or soil vapor contamination exceeding regulatory action levels. If the Phase II ESA concludes that the site is contaminated, remediation or corrective action (e.g., removal of contamination, in-situ treatment, capping, venting, monitoring, alarm, and system activation measures) would be conducted prior to or during construction under the oversight of federal, state, and/or local agencies (e.g., USEPA, DTSC, RWQCB, Los Angeles County) and in full compliance with current and applicable federal and state laws and regulations. Additionally, Voluntary Cleanup Agreements may be used for parcels where remediation or long-term monitoring is necessary.

HAZ PM-6 Demolition Plans:

The contractor will prepare demolition plans for the safe dismantling and removal of building components and debris prior to construction. The demolition plans will be completed to Metro's contractor specifications and will include the following:

- LBP testing and abatement procedures
- Proper procedures for handling and disposal of lead and chromium in roadway paint striping
- ACM testing and abatement procedures
- PCB testing and abatement procedures

The demolition plans will be submitted to Metro for verification that appropriate demolition practices will be followed, consistent with federal and state handling and disposal regulations regarding ACM, lead, LBP, and PCBs.

Project Measures

HAZ PM-7 Disposal of Groundwater:

If disposal of contaminated groundwater (decontamination water, purge water, dewatering, or underground structures [groundwater leakage into the final structure]) is generated during construction, the LARWQCB will be consulted and the Project will comply with permits as required by the LARWQCB. The LARWQCB may require that an individual NPDES permit and/or waste discharge requirements be obtained for dewatering activities. Additionally, the following agencies will be contacted as needed:

- City of Los Angeles Sanitation will be notified if contaminated groundwater will be discharged to the sewer system.
- City of Vernon Health and Environmental Control Department will be contacted if contaminated groundwater will be discharged to the stormwater system.
- County of Los Angeles Department of Public Health will be contacted if contaminated groundwater is encountered during dewatering within the boundaries of the following cities: Huntington Park, Bell, Cudahy, South Gate, Downey, Paramount, Bellflower, Cerritos, and Artesia, and the unincorporated community of Florence-Firestone.

The groundwater discharge and disposal requirements vary by agency, location, concentration, and contaminant of concern and, therefore, are developed in consultation with the appropriate agency and the project proponent.

HAZ PM-8 Oil Well Abandonment:

The Well Safety Devices for Critical Wells (CCR, Title 14, Section 1724.3) regulation governs safety devices required on “critical wells” located within 100 feet of an operating railway. Therefore, prior to demolition, grading, or construction within 400 feet of operating or abandoned oil wells, the contractor must perform the following steps in the Affected Area for hazards and hazmat (within 200 feet of the LPA footprint) to reduce risk:

- Notify CalGEM about planned subsurface work within 200 feet of the LPA footprint and use its Construction Site Review Plan Program to locate wells (CalGEM 2020).
- “Critical” oil wells within 100 feet of the construction footprint will be evaluated by CalGEM to determine if they require additional safety features. The definition of a critical oil well is set forth in California Code of Regulations, Title 14, section 1720(a).
- The Department of Conservation’s Geologic Energy Management Division (CalGEM, formerly DOGGR) Construction Site Well Review Program will be utilized per Section 3208.1 of the Public Resources Code and the local permitting agencies will also be consulted to evaluate whether any specific preconstruction requirements will apply to oil wells located within 100 feet of the construction footprint.
- Oil well abandonment must proceed in accordance with Sections 3228, 3229, 3230, and 3232 of the Public Resources Code. These requirements include written notification to CalGEM, protection of adjacent property, and before commencing any work to abandon any well, obtaining approval by CalGEM.
- Abandonment work, including sealing off oil and gas bearing units, pressure grouting, etc., must be performed by a state-licensed contractor under the regulatory oversight and approval of CalGEM.

Proper abandonment of oil wells must be conducted by the contractor prior to conducting subsurface activities that disturb soil, and documentation of the completed work will be provided to Metro. Documented wells in the Affected Area for hazards and hazmat and undocumented oil and gas wells encountered during construction will also be subject to this project measure.

Project Measures

HAZ PM-9 Contaminated Soil, Soil Vapor, and Groundwater:

Prior to the start of construction, the contractor must retain a qualified environmental consultant to prepare a Soil Management Plan; Soil Reuse Management Plan; Groundwater Management Plan; Landfill Gas Accumulation Management Plan; and/or Soil, Soil Vapor, and Groundwater Management Plan. These plans must be completed to Metro's contractor specifications and submitted to Metro prior to any ground-disturbing activities for the LPA. Alternatively, Soil, Soil Vapor, and/or Groundwater Plans may be prepared separately or together as a Soil, Soil Vapor, and Groundwater Management Plan.

The Soil and Soil Vapor Plans (and/or Landfill Gas Accumulation Management Plan) must establish provisions per Metro's contractor specifications for the disturbance of contaminated materials (known and undocumented). Proper management and disposition of contaminated soils gases will be determined in consultation with appropriate regulatory agencies and in accordance with applicable federal and/or state guidance (USEPA, DTSC, RWQCB, and other local agencies).

The Soil Reuse Management Plan must establish provisions per Metro's contractor specifications for the reuse of contaminated known or undocumented soils. Proper management and disposition of contaminated soils will be determined in consultation with appropriate regulatory agencies and in accordance with applicable federal and/or state guidance (USEPA, DTSC, RWQCB, and other local agencies).

The Groundwater Management Plan, which must be prepared prior to construction activities, will establish provisions per Metro's contractor specifications for encountering and managing contaminated groundwater (known and undocumented). Proper disposal of contaminated groundwater will be determined in consultation with appropriate regulatory agencies and in accordance with applicable federal and/or state guidance (USEPA, DTSC, RWQCB, and other local agencies).

Where open or closed regulatory release cases are already managed by a regulatory agency (USEPA, DTSC, RWQCB, etc.) and Metro plans to alter the use of the site and/or disturb contaminated soil and/or groundwater on-site, Metro will notify the regulatory agency of the planned land use changes prior to ground-disturbing activities at the location of the open or closed regulatory release site. The regulatory agency will determine the level of investigation and/or remediation (performance standards) necessary on a case-by-case basis. A closure or no further action determination letter from the regulatory agency will be obtained when investigation and/or remediation is complete.

Historic, Archaeological, and Paleontological Resources

CR PM-1 SOI Standards Design Review:

As the Project progresses through the design phase, associated designs will be reviewed and approved by a professional who meets the Secretary of the Interior's Professional Qualification Standards in architectural history, history, or architecture (36 CFR 61). The goal of the review will be to confirm that designs remain consistent with the fundamental principles of the Secretary of the Interior's Standards for the Treatment of Historic Properties and guidelines for Rehabilitation (36 CFR 68).

Safety and Security

SAF PM-1 Emergency Access:

Metro will coordinate access for emergency responders, locations of fire hydrants, and security features with the applicable fire and police departments in addressing fire, life, safety, and security for the LPA, parking facilities, and station areas within their respective jurisdictions.

SAF PM-2 Security Assessments:

Metro will employ an ongoing assessment of security at all WSAB station areas for possible redeployment of law enforcement and security services.

SAF PM-3 Freight Track Clearance:

There will be a minimum 20-foot horizontal clearance between the LPA and freight track(s) where the LPA is located at-grade in shared ROW. This occurs primarily from Randolph Street to World Energy.

Project Measures

SAF PM-4 Pedestrian Bridge:

The pedestrian bridge at Paramount High School connecting athletic fields to the school will be reconstructed to avoid potential interactions between pedestrians and vehicle traffic.

SAF PM-5 Certification and Approval:

The LPA will comply with all FTA and FRA safety and security certification processes and approval prior to the start of revenue operating services. This includes conducting a PHA and a TVA. The PHA will assess the potential hazards introduced by or associated with a design. The TVA will verify critical assets and vulnerability to specific threats based on the likelihood of occurrence and the severity of occurrence and develop countermeasures for addressing prioritized vulnerabilities.

SAF PM-6 Metro Compliance.

The LPA will be operated in compliance with Metro's policies, standard operating procedures, and rulebook or equivalent, as approved by Metro.

SAF PM-7 Station Access:

The LPA will include modifications to provide safe and ADA-accessible access for pedestrians and bicyclists at stations.

SAF PM-8 Fire/Life Safety Committee:

A Fire/Life Safety Committee for the LPA will be established per the MRDC or equivalent and FTA requirements. The committee will be tasked with addressing fire protection requirements for the operation of the LPA, along with establishing minimum requirements that will provide for the protection of life and property from the effects of a potential fire. Additional safety and security design recommendations may be identified by the Fire/Life Safety Committee as the LPA's design progresses further during preliminary engineering and final design.

SAF PM-9 Service Providers:

Metro will coordinate with police and fire service providers prior to and during construction.

SAF PM-10 MRDC Compliance:

The LPA will be designed and constructed in compliance with the MRDC or equivalent related to safety and security.

SAF PM-11 Fire/Life Safety Committee (Construction):

A Fire/Life Safety Committee for the LPA will be established per the MRDC or equivalent and FTA requirements. The committee will be tasked with addressing fire protection requirements for the construction of the LPA.

Source: TAHA and WSP 2024

West Santa Ana Branch Transit Corridor

Attachment B: Summary of Comments Received on the Final EIS/EIR
and Responses



Metro®

WEST SANTA ANA BRANCH TRANSIT CORRIDOR PROJECT

**Comments Received During the Final EIS/EIR
Comment Period**

Attachment B Summary of Comment Received on the Final EIS/EIR and Responses

Attachment B: Summary of Comments Received on the Final EIS/EIR and Responses

Comment Summary	Response
US Environmental Protection Agency (EPA) (Letter dated April 26, 2024)	
The EPA summarized data from the Draft EIS/EIR and encourages FTA and Metro to coordinate with SCAQMD regarding NOx emission reductions during the construction phase.	The Draft EIS/EIR used CalEEMod Version 2016.3.2 and EMFAC2017 to estimate pollutant emissions during construction and operation. The analysis for the Final EIS/EIR was updated using versions CalEEMod 2020.4.0 and EMFAC2021. This update resulted in a greater reduction in emissions in the Final EIS/EIR analysis than the reduction documented in the Draft EIS/EIR. Table 4.19.9 of the Final EIS/EIR indicates that the maximum NOx emissions during construction would be 65 pounds per day relative to a SCAQMD threshold of 100 pounds per day. Metro will continue to coordinate with SCAQMD regarding any air quality permits that may be needed for the project.
The EPA recommends continuous community engagement.	As discussed in Section 7.11.2 of the Final EIS/EIR, Metro has an ongoing public outreach process which will evolve and continue during the duration of the project. Mitigation Measure COM-1 (Construction Outreach Plan), described in Section 4.19.3.2 of the Final EIS/EIR, will be developed and implemented during construction, which will include providing the public with updates and information on the project website.
The EPA recommends that the Soil Management Plan include separate provisions for the testing and disposal of nonhazardous and hazardous soils and identify facilities that will accept contaminated soils unearthed during Project implementation. Confirm in the ROD that the impacts associated with the transport of both nonhazardous and hazardous soils away from the Project site have been considered and mitigated.	Section 4.10.4.1 of the Final EIS/EIR provides information about the plans and processes for management and segregation of contaminated soils, including the handling, storage, and transport of hazardous materials. The transportation of nonhazardous and hazardous soils was considered in the Final EIS/EIR and are addressed in the project commitments included in this ROD.

Attachment B Summary of Comment Received on the Final EIS/EIR and Responses

Comment Summary	Response
California Public Utilities Commission (Letter dated April 29, 2024)	
Commission staff reiterated a request for further evaluation of grade separation or grade crossing elimination at 11 at-grade crossing locations.	<p>As noted in common response CR-GEN-4 in Appendix D of the Final EIS/EIR, the Metro Board-approved <i>Grade Crossing Safety Policy for Light Rail Transit</i> (originally prepared in December 2003 and revised in October 2010) was used to determine locations for grade separation for the Project. This policy provides a standardized, systemwide methodology in Los Angeles County to determine whether grade crossings along light rail transit lines should be grade separated or at-grade. Key factors in evaluating the need for a grade separation include traffic volumes, train frequency, safety considerations (including, but not limited to, traffic queuing, sight distance, traffic speeds, truck percentages, and accident rates), and a variety of special circumstances (e.g., vertical engineering alignment considerations, effects on traffic operations, pedestrian activity, and adjacent land uses). Based on the Metro Grade Crossing Policy, areas that satisfied the grade separation criteria along the LPA alignment were identified and evaluated. Based on the application of the policy, at-grade crossings were assumed at the 11 locations noted in the comment submission.</p> <p>Project refinements were identified in the Final EIS/EIR that included restricting left-turn movements on Randolph Street at 4 locations, all of which are noted in the comment submission as locations where further evaluation of grade separation or grade crossing elimination is requested. As noted in response to comment SA-2-6 in Appendix D of the Final EIS/EIR, the traffic analysis was updated after circulation of the Draft EIS/EIR and included the left turn restrictions, as well as changes in the locations where at-grade crossings are proposed for closure (Randolph Street at Wilmington Avenue, Regent Street, Malabar Street, Rita Avenue, and Arbutus Avenue). As further noted in the response to that comment, implementation of the LPA requires reducing the number of travel lanes on Randolph Street, which combined with train crossing activity, will result in adverse impacts at intersections. Additional mitigation was not recommended as right-of-way acquisitions would be required to accommodate additional travel lanes on Randolph Street and along Gage Avenue and Florence Avenue. Additional grade separations would increase the overall cost of the project while additional eliminations of</p>

Attachment B Summary of Comment Received on the Final EIS/EIR and Responses

Comment Summary	Response
	<p>at-grade crossings would exacerbate adverse level of service impacts at the intersections that remain open.</p> <p>Metro will continue to coordinate with CPUC staff as the project design advances, particularly regarding the design of each at-grade crossing. Should any design refinements be identified during this process, they may be subject to environmental re-evaluation under NEPA and/or CEQA.</p>

LA Department of Water and Power (Letter dated April 23, 2024)

LADWP has property rights in the areas affected by the project and requests coordination and review of design in these areas.	Effects to Los Angeles Department of Water and Power (LADWP) facilities were evaluated in the Draft and Final EIS/EIR, including the partial acquisition of right-of-way in the City of Paramount. Effects to LADWP facilities were also considered in the energy analysis and the LADWP Boulder Dam-Los Angeles 287.5 kV Transmission Line was considered in the Section 106 and visual analyses. Metro recognizes LADWP property rights and has coordinated with LADWP regarding how the Project interacts with LADWP infrastructure. Coordination will continue throughout project design and construction.
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Los Angeles Unified School District (April 15, 2024, email, response provided via email on April 23, 2024)

Requested confirmation regarding a partial acquisition at Huntington Park High School, noting that the Final EIS/EIR noted a “permanent incorporation of land” in Section 5.4.1.3.	The following response was sent via email on April 23, 2024: The LA Unified was included in the distribution of the Draft EIS/R followed by a 60-day public comment period. After the circulation of the Draft EIS/EIR, the grade crossing design at Randolph Street and Miles Avenue was refined, which required updates to the design of the curb ramp and sidewalk. From an acquisition standpoint, a permanent partial acquisition and a temporary construction easement are proposed on the property. The permanent, partial acquisition is required to reconstruct the sidewalk and curb ramp located at the southwest corner of the property. The existing sidewalk along the south side of the property will be reconstructed to accommodate the realignment of Randolph Street and modifications at the Randolph Street/Miles Avenue intersection required to accommodate the project. The temporary construction easement is required to construct
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Attachment B Summary of Comment Received on the Final EIS/EIR and Responses

Comment Summary	Response
	<p>the sidewalk and curb ramp. No access or structures will be affected by the acquisitions. The reconstructed sidewalk will meet ADA requirements and continue to provide safe access to and from the school.</p> <p>The activities noted in the email (“permanent incorporation of land” and “temporary occupancy”) are terminology specific to Section 4(f) of the US Department of Transportation Act of 1966. This act provides special protection of publicly owned land of a public park, recreation area, or wildlife and waterfowl refuge of national, state, or local significance, or land of a historic site of national, state, or local significance (as determined by the official(s) with jurisdiction over the park, area, refuge, or site). “Permanent incorporation of land” is used when land is converted to transportation right-of-way from some other non-transportation use (in this case, landscaping).</p> <p>As a result of the design refinement noted above, the Area of Potential Effects used to evaluate historic resources for the project was expanded after circulation of the Draft EIS/EIR. As part of this effort, Huntington Park High School was added to the APE. Based on a record search for the project, it was found that the high school was previously evaluated by LAUSD for historical significance and was assigned CHR status code “3S” indicating the campus “appears eligible for the National Register of Historic Places or California Register of Historic Resources through survey evaluation”. The studies conducted in support of the project confirmed that the property is eligible for listing the National Register, the California Register, and for local designation in the area of architecture. As such, the high school qualifies as a historic site of national, state, or local significance, and therefore, also required evaluation as a Section 4(f) resource. The buildings located on the property, the primary reason for its significance, will not be physically altered or modified by the project. Additionally, due to the nature of the already existing urban environment, proposed alterations to the property are in keeping with its existing character and will not diminish its integrity. These findings were considered as part of the Section 4(f) analysis.</p> <p>The property acquisition process does not begin until after the Record of Decision is issued for the project. This is currently anticipated for June/July 2024.</p>

Attachment B Summary of Comment Received on the Final EIS/EIR and Responses

Comment Summary	Response
Los Angeles Unified School District (letter dated April 29, 2024)	
LAUSD identified four additional schools within ¼ mile of the LPA.	Metro thanks LA Unified School District (LAUSD) for the additional information. None of the four identified schools will be directly affected by the Project. Future coordination with LAUSD will be inclusive of the additional schools where relevant.
LAUSD is concerned with easements on Huntington Park High School and San Antonio Elementary School.	A permanent partial acquisition and a temporary construction easement are proposed on both the Huntington Park High School and San Antonio Elementary School properties. The effects to the properties are limited to the modifications and reconstruction of the sidewalk and curb ramps, and Metro will not utilize the properties for permanent operations. At Huntington Park High School, the permanent partial acquisition is located at the southwest corner of the property. At San Antonio Elementary, the permanent partial acquisition is located at the northwest corner of the property. The existing sidewalks and curb ramps adjacent to these properties will be reconstructed to accommodate the realignment of Randolph Street required for the project. Additionally, the driveway at San Antonio Elementary will require reconstruction. The temporary construction easements are required to construct the sidewalk, driveway, and/or curb ramp. No structures, access, or parking at the schools will be affected by the permanent partial acquisitions or the temporary construction easements.
LAUSD is concerned with work near schools.	Construction activities will occur near schools, and mitigation measures will be implemented to minimize construction impacts to the schools (e.g., Mitigation Measure COM-1 [Construction Outreach Plan], Mitigation Measure SAF-2 [School District Coordination]).
LAUSD requests construction coordination to ensure student safety and minimize disruptions.	Metro will continue coordination with LAUSD, including during development of the Transportation Management Plan (Mitigation Measure TRA-18), which will address safe access to the schools near project construction. Additionally Mitigation Measure SAF-2 (School District Coordination) will be implemented during construction.

Attachment B Summary of Comment Received on the Final EIS/EIR and Responses

Comment Summary	Response
LAUSD is concerned with transport of hazardous materials near schools during construction and operation.	Sections 4.10.5.3 and 4.19.3.10 of the Final EIS/EIR addresses the transport of hazardous materials near schools and commits through Project Measures HAZ PM-1 (Handling, Storage, and Transport of Hazardous Materials or Wastes [Operation]) and during construction Project Measure HAZ PM-4 (Handling, Storage, and Transport of Hazardous Materials or Wastes) to prepare and implement plans and procedures to meet federal and state requirements for the handling, storage, and transport of hazardous materials or wastes.
LAUSD is concerned with air pollutant emissions near schools during construction and suggests specific measures.	<p>Metro will comply with SCAQMD, local, and State rules and regulations that govern air pollution emissions. The following summary provides a mapping of the control measures suggested by LAUSD to Metro's environmental commitments:</p> <ul style="list-style-type: none">• Rule 403: <i>Metro will comply with SCAQMD Rule 403 (Fugitive Dust). This rule requires implementing best practices to control dust emissions from construction sites. Measures include using water or chemical stabilizers to suppress dust, covering haul trucks, and limiting vehicle speeds on unpaved roads. Many of the following recommendations submitted by LAUSD are control measures listed in Rule 403.</i>• Rule 1466 (e)(15): <i>Metro will comply with SCAQMD Rule 1466 (Control of Particulate Emissions from Soils with Toxic Air Contaminants). This rule requires specific actions to minimize airborne emissions from soils that contain toxic air contaminants, including continuous air monitoring and covering excavated soil.</i>• Clean diesel equipment: <i>As discussed in Section 4.19.3.5 of the Final EIS/EIR, Metro is committed to using Tier 4 engines in construction equipment.</i>• Construction vehicle idling: <i>The Metro Green Construction Policy requires construction contractors to limit idling. Additionally, Metro will comply with the California Air Resources Board Airborne Toxic Control Measure set forth in Title 13, Section 2485 of the California Code of Regulations, which restrict idling of diesel-fueled commercial motor vehicles.</i>

Attachment B Summary of Comment Received on the Final EIS/EIR and Responses

Comment Summary	Response
	<ul style="list-style-type: none">• Construction equipment: <i>The Metro Green Construction Policy requires construction contractors to maintain equipment according to manufacturers' specifications.</i>• Excavated soil: <i>SCAQMD Rule 403 control measures related to loading and transporting soil in trucks will be followed. This includes covering truck beds with tarps, ensuring the soil is adequately wetted before loading, and cleaning the exterior of the trucks to prevent dust from being carried off-site.</i>• Transporting soil: <i>SCAQMD Rule 403 control measures related to loading and transporting soil in trucks will be followed.</i>• Soil drop height: <i>Metro will comply with SCAQMD Guidance associated with Control Measures 17-1 and 17-2 to "Ensure that the loader bucket is close to the truck to minimize drop height while loading".</i>• Excavated areas: <i>SCAQMD Rule 403 control measures related to stabilizing soil in excavated areas will be followed, including by applying water or other suppressants to keep soil moist and prevent dust.</i>• Stockpiled soil: <i>SCAQMD Rule 403 control measures related to stockpiled soils will be followed, including covering soil piles with tarps or plastic sheeting.</i>• Winds: <i>SCAQMD Rule 403 contains measures related to stockpiled soil during high-wind events will be followed.</i>• Street sweeping: <i>SCAQMD Rule 403 Part (d)(4) will be followed.</i>• Wheel washers: <i>SCAQMD Rule 403 Part (d)(5)(D) will be followed.</i>• Wind speeds: <i>SCAQMD Rule 403 Part (d)(2) limitations to soil disturbing activities when wind gusts exceed 25 miles per hour will be followed.</i>• Hazardous substances: <i>SCAQMD Rule 1466 (Control of Particulate Emissions from Soils with Toxic Air Contaminants) will be followed, which requires specific handling, monitoring, and measures to protect public health with respect to contaminated soils.</i>

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Comment Summary	Response
LAUSD is concerned with noise at schools during construction.	<p>The schools noted by LAUSD as noise sensitive were identified as sensitive receptors in Figure 4.7-5 of the Final EIS/EIR.</p> <p>Relative to LAUSD noise standards, the maximum unmitigated predicted light rail noise level at LAUSD schools would be approximately 60 dBA Leq at Cluster N83: Huntington Park High School, which would not exceed LAUSD's 67 dBA Leq exterior noise standard. This level is also less than the FTA impact criteria, as documented in Table 5.3 of the <i>Final Noise and Vibration Impact Analysis Report</i>.</p> <p>Regarding construction noise, temporary increases in noise could potentially affect school operations. The Final EIS/EIR includes Mitigation Measure NOI-6 (Noise Control Plan), which requires Metro's contractor to develop and implement a noise control plan demonstrating how noise criteria will be achieved during construction. Metro will coordinate with LAUSD staff to minimize disruption to the teaching environment.</p>
LAUSD is concerned with pedestrian safety and access traffic near schools during construction and suggests specific measures.	<p>Pedestrian safety near schools is addressed in Sections 3.7.3 and 4.19.3.18 of the Final EIS/EIR. Specifically, the commitments of mitigation measures TRA-18 (Transportation Management Plan) and SAF-2 (School District Coordination) address how site-specific measures and strategies will be developed in consultation with LAUSD to maintain safe access to schools. Metro will continue coordination with LAUSD on the suggested measures.</p> <p>Additionally, Mitigation Measures COM-1 (Construction Outreach Plan) and SAF-3 (Construction Site Measures) address several of LAUSD's suggestions. As part of Mitigation Measure SAF-3 (Construction Site Measures), Metro's contractor will provide safety and security measures at the construction sites and staging areas. Security measures will include barriers for excavations, installation of temporary barriers around perimeters, security patrols, and appropriate signage and lighting. Specific elements of Mitigation Measure COM-1 (Construction Outreach Plan) related to safety and security for construction-related impacts include the following:</p>

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Comment Summary	Response
	<ul style="list-style-type: none">Provide signage to direct pedestrians and motorists around construction areas; around sidewalk, street, and lane closures; to entrances of businesses and community assets; and to maintain the flow of traffic around the construction area.Provide appropriate signage, barriers and fencing for pedestrian and bicycle detour routes to prevent pedestrians and bicyclists from entering the construction zones.Provide the public with construction updates, alerts, and schedules through informational meetings, the project website, and other forms of communication such as, but not limited to, mailings and flyers to businesses and residences with 0.25-mile of the construction zone.
City of Artesia (Letter dated April 29, 2024)	
The city provided a labeling update for a figure in Final EIS/EIR Chapter 1.	The change in the district name is noted, however, it does not alter the analysis or impact conclusions.
The city requests that 187 th Street remain open.	On April 25, 2024, the Metro Board of Directors considered the City's request and certified the Final EIR which includes the design option that would close 186th Street but keep 187th Street open in the City of Artesia. The Record of Decision also identifies keeping 187th Street open as the selected alternative.
The city noted an existing residential parking permit district and requested clarification of how that would affect station access parking.	Permit parking within the City of Artesia has been identified, as noted in Section 4.5.1.5 and in Table 4-50 of the <i>West Santa Ana Branch Transit Corridor Project Final Transportation Impact Analysis Report</i> (Metro 2024s). On-street parking effects discussed in Section 3.4.4.2 of the Final EIS/EIR were assessed by comparing the observed parking demand with the number of parking spaces available after the removal of spaces resulting from implementation of the LPA. Though parking loss due to implementation of the LPA will occur in areas with permit parking, it is not anticipated to result in the on-street parking supply to decrease below demand. The permit districts will otherwise remain unchanged. Based on surveys and the observed utilization, parking supply on adjacent blocks and surrounding streets will have sufficient capacity to

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Comment Summary	Response
	<p>accommodate those utilizing on-street parking that will be displaced by the LPA. Therefore, on-street parking impacts are not expected to be adverse at these locations. At the Pioneer Station in the City of Artesia, a transit parking structure with approximately 1,100 spaces will be provided. The spillover parking analysis in the Final EIS/EIR considered whether operation of the LPA could result in the demand for transit parking exceeding the parking supply being provided as part of the LPA. As discussed in Section 3.2.4.2 of the Final EIS/EIR, the spillover parking methodology was updated for the Final EIS/EIR in response to comments on the Draft EIS/EIR to remove the consideration of available on-street parking to meet unmet station parking demand. Adverse spillover parking impacts could occur if transit parking demand exceeds transit parking supply, regardless of the availability of surrounding on-street parking, as this could result in drivers circulating along roads adjacent to the station as they attempt to find available parking. This updated methodology provides a more conservative approach to the analysis of potential impacts related to spillover parking at stations. As shown in Table 3-19 of the Final EIS/EIR, there is an estimated excess parking supply of 230 spaces at the Pioneer Station parking facility, and therefore Metro does not anticipate adverse impacts associated with spillover parking.</p>
The city is looking for details on which 12 intersections will have adverse impacts.	Information regarding the intersections with remaining adverse impacts related to traffic operations after mitigation that are summarized in the Executive Summary are discussed in Section 3.5.2.1 of the Final EIS/EIR and listed in Table 3-21, Table 3-22, and Table 3-24. None of the 12 intersections is located within the City of Artesia.

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Comment Summary	Response
The city is looking for details on effects to the Artesia Bike Lane	The Final EIS/EIR was updated to include discussion of the Artesia Historic District Recreation Trails, in response to comments received on the Draft EIS/EIR from the City of Artesia. The Artesia Historic District Recreation Trails are discussed in Sections 4.1.3.2, 4.2.3.2, 4.4.2.4, and 4.16.3.2 of the Final EIS/EIR. The Project will not require the realignment of the Artesia Historic District Recreation Trails, and the facility will not be permanently affected during operation of the Project. The function of the bike trails will be maintained, access will not be affected, and the bike trails will continue to be available for use by the community.
The city is looking for details on the locations of severe noise impacts	Details regarding noise impacts that are summarized in the Executive Summary are provided in Section 4.7 of the Final EIS/EIR. Table 4.7.6 identifies unmitigated and mitigated noise levels for individual noise clusters where noise impacts were predicted, and Figure 4.7-5 provides maps of the locations of impacts remaining after mitigation.
The city asked why effects on the Pioneer Boulevard and South Street intersection was not analyzed.	The Final EIS/EIR does include analysis of the Pioneer Boulevard and South Street intersection. Refer to Table 3-12, intersection #99, in Chapter 3 of the Final EIS/EIR for the results of the analysis.
The city is interested in how grade crossing modifications at 186th and 187th would affect Pioneer Station access.	The grade crossing modifications at 187th Street and closure of 186th Street would not affect how users access the Pioneer Station as the main entrance and exit to the parking structure will be from Pioneer Boulevard. Pedestrian access to the station would be accommodated at 187th Street.
The city notes that street vacation requires City Council approval.	This comment is acknowledged. Metro will coordinate with the city accordingly.
The city is seeking an understanding of traffic circulation effects of street closures.	The circulation effects of street closures in the City of Artesia were analyzed in the Final EIS/EIR. Sections 3.4.1.2 and 3.4.1.3 summarize the analysis results of delay and level of service for intersections at and adjacent to 186th and the 187th closures.

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Comment Summary	Response
The city requests a wayfinding sign analysis to support design.	Wayfinding signage will be determined as design progresses. Per the terms of the Master Cooperative Agreement, the City of Artesia will have the opportunity to review design packages and provide comments.
The city requests a bicycle and pedestrian circulation analysis.	The potential for project components, including parking facilities, to affect access and mobility within the surrounding communities is discussed in Section 4.2.3.2 of the Final EIS/EIR. The parking facility will not impede access and mobility of motorists, pedestrians, and bicyclists to the surrounding residential neighborhoods, businesses, and community assets.
The city states that the parking structure would require a zone change.	As a legislatively created regional transportation authority, Metro is not subject to local zoning requirements (<i>Rapid Transit in Rapid Transit Advocates, Inc. v Southern Cal. Rapid Transit Dist.</i> (1986) 185 Cal.App.3d 996).
The city requests ground floor retail be allowed for in the parking structure.	Metro will coordinate with the city as design of the parking structure advances. However, the provision of retail, if any, would be completed by the city and is independent of the Project.

City of Bellflower (Letter dated April 25, 2024)

The City of Bellflower expressed conditional support for the MSF siting provided that conditions are met.	The City's conditional support is noted.
City of Bellflower conditional support for the MSF siting depends on the MSF being aesthetically pleasing, meeting regulatory and mitigation requirements, and coexisting with neighboring uses.	As described in response to the City of Bellflower's comment CC-6-10 in Appendix D of the Final EIS/EIR, the Bellflower MSF site has been designed to limit adverse effects on the surrounding neighborhoods. Project Measure VA PM-5 (Landscaping at Bellflower MSF Site Option) is integrated into the design of the Bellflower MSF to obstruct views of the Bellflower MSF site from adjacent residential areas. The Draft EIS/EIR assessed and explained how operation and construction of the Bellflower MSF site will not result

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Comment Summary	Response
	in adverse effects for all analyzed environmental topic areas. Refer to response to comment CC-6-9 for additional information regarding landscaping at the MSF.
City of Bellflower conditional support for the MSF siting depends on hiring policy for staffing the MSF being “Bellflower First”.	Staffing will be hired per State and Federal law and Metro hiring policies. These policies are not subject to NEPA review and will be addressed outside of the Record of Decision.
City of Bellflower conditional support for the MSF siting depends on fair market valuation of the property.	Metro will comply with requirements of Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 and the California Relocation Act during the property acquisition process. The property will be appraised per standard real estate practices and the appraisal will form the basis for property valuation.
City of Bellflower conditional support for the MSF siting depends on the property meeting the City’s local match requirements.	As described in common response CR-FN-1 in Appendix D of the Final EIS/EIR, the 3 percent local contribution is one of the financial resources supporting Metro’s major rail transit projects program in the Measure M Expenditure Guidelines. This match is independent of the NEPA process. Metro will continue to coordinate with the City on meeting local match requirements.
City of Bellflower conditional support for the MSF siting depends on community open space being provided.	As described in response to the City of Bellflower’s comment CC-6-5 in Appendix D of the Final EIS/EIR, Metro will continue to work with City of Bellflower staff regarding the design and site plan of the MSF and not to preclude a potential city open space. The design plans included in Appendix B of the Final EIS/EIR show the area adjacent to the MSF that has been reserved for city use.
City of Bellflower conditional support for the MSF siting depends on Metro taking responsibility for leaseholder relocation.	Relocation of the business on the MSF site will comply with requirements of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 and the California Relocation Act.

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Comment Summary	Response
The City has begun a rezoning process that includes the MSF site and suggested considering propose general plan amendment and zone changes.	<p>The rezoning process is noted. The Final EIS/EIR, Notice of Determination, and Record of Decision serve as notice to the City of future action on the site and future land use decisions should be made consistent with the approved action. As a legislatively created regional transportation authority, Metro is not subject to local zoning requirements (<i>Rapid Transit in Rapid Transit Advocates, Inc. v Southern Cal. Rapid Transit Dist.</i> (1986) 185 Cal.App.3d 996).</p>
The City believes available on-street parking was overestimated.	<p>The analysis applied a conservative approach to the estimate of on-street parking to avoid overestimating parking availability. The analysis uses 25 feet as a measurement guide for unmarked parking spaces. The California Manual on Uniform Traffic Control Devices establishes a minimum length of 20 feet for parking stalls. The City of Bellflower does not define the size of on street parking spaces; however, in reference to off-street parking, Section § 17.88.010 of the city municipal code defines a "parking space" as any permanently maintained space of not less than 9 feet by 20 feet.</p> <p>Though AB 431 had not yet been passed at the time the parking surveys were conducted, a distance of generally 10 to 20 feet from marked and unmarked crosswalks was excluded from the estimates of parking availability as a best practice.</p> <p>The updated parking surveys for the Final EIS/EIR within the City of Bellflower were conducted on Tuesdays, Wednesdays, or Thursdays in January, March, and May 2023 between the hours of 6:30AM-8:30AM or between 11:00AM-2:00AM. The day of the parking surveys was determined based on the parking regulations of each roadway segment in order to avoid days with parking restrictions. No surveys were conducted on the street sweeping days of the surveyed segments. The time of the surveys was determined based on land uses. Residential areas were surveyed between 6:30AM-8:30AM and commercial areas were surveyed between 11:00AM-2:00AM.</p>

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Comment Summary	Response
<p>The City requests additional mitigation for the remaining severe noise impact, to be involved in soundwall design review, and consideration of alternative mitigation if CPUC approval of proposed measures does not occur.</p>	<p>Metro has implemented mitigation measures to reduce noise. As discussed in Section 4.4.7.2 of the Final EIS/EIR, 4 severe noise impacts will remain after mitigation. Within the City of Bellflower, as shown in Table 4.7.6 in the Final EIS/EIR, the predicted mitigated noise level at Receptor N246 near the intersection of Clark Avenue and Alondra Boulevard is approximately 65 dBA Ldn after incorporating Mitigation Measure NOI-1 (Soundwalls) with a soundwall height at this location of 12 feet, which was the height determined to have the maximum benefit. The remaining impact is a result of a gap in the soundwall at a roadway intersection and as a result of the gap, cannot be further reduced. As noted in Section 4.4.7.2 of the Final EIS/EIR, some impacts are not mitigable due to the combination of mitigation measures not being able to provide adequate attenuation due to elevated project noise levels. Additionally, Common Response CR-GEN-5 in Appendix D of the Final EIS/EIR provides additional information on implementation and recommendation of mitigation measures.</p> <p>As outlined in the Master Cooperative Agreement, coordination with the city will continue through the advancement of design and into construction. The Master Cooperative Agreement will provide the City of Bellflower with the opportunity to review design plans as design progresses. Metro has implemented bell shrouds and gate-down-bell stop variances on the A Line as part of the Metro Gold Line Foothill Extension light rail transit project and along the E Line (Expo Line). The measures on these projects were required to obtain certification from CPUC. Additionally, Metro discussed the updated noise analysis for the LPA and results with CPUC during preparation of the Final EIS/EIR, and coordination with CPUC will continue as the project design advances. The updated noise analysis is included in Section 4.7 of the Final EIS/EIR and the <i>Final Noise and Vibration Impact Analysis Report</i> (Metro 2024).</p>
<p>The City is concerned regarding MSF construction noise identified in the Final EIS/EIR.</p>	<p>As described in response to the City of Bellflower's comment CC-6-34 in Appendix D of the Final EIS/EIR, an analysis of potential noise levels during construction of the Bellflower MSF is included in Section 4.19.3.7 of the Draft EIS/EIR. The Noise Control Plan prepared pursuant to Mitigation Measure NOI-8 in the Draft EIS/EIR (referred to as NOI-6 in the Final EIS/EIR) will include measures to reduce construction noise. Where</p>

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Comment Summary	Response
	<p>construction cannot be performed in accordance with the FTA 1-hour Leq construction noise limits, the contractor will investigate alternative construction measures to lower sound levels. Noise reducing methods that may be implemented include, but are not limited to, installation of temporary noise barriers or noise control curtains, enclosures around construction equipment, high performance mufflers and limiting impact devices which produce high instantaneous noise. With the implementation of mitigation, there may be instances when noise thresholds may be exceeded. Therefore, the Final EIS/EIR identifies adverse noise impacts.</p>
The City requests clarification regarding changes in Air Quality and Noise data between the Draft and EIS/EIR and states that the Draft EIS/EIR is not available on the project's website.	<p>The Draft EIS/EIR has been continuously available through Metro's website at the following direct link: https://www.metro.net/projects/southeastgateway/#documents. A flash drive with the Draft EIS/EIR was also provided to multiple individuals with the City of Bellflower in July 2021, which is documented in the List of Recipients included in the Draft EIS/EIR.</p> <p>Responses to comments received on the Draft EIS/EIR referenced specific sections of the Draft EIS/EIR to point to the information directly applicable to the comment. References to the Final EIS/EIR were used in responses when information was updated, added, or changed.</p> <p>Each subsection in Chapter 4 of the Final EIS/EIR includes an explanation of changes made subsequent to the Draft EIS/EIR. For example, the opening paragraphs of Section 4.5 (Air Quality) include a description of updated modeling methods and results. Likewise, Section 4.7 (Noise and Vibration) discusses updated modeling methods, refined mitigation design, and incorporation of additional project measures; it then provides a summary of the reduction in unmitigated noise impacts between the Draft and Final EIS/EIR.</p>

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Comment Summary	Response
The City requests participation or review of bio-swale/flood control measures and MSF site design.	Metro has continued to coordinate with the City of Bellflower since circulation of the Draft EIS/EIR. As outlined in the Master Cooperative Agreement, this coordination will continue through the advancement of design and into construction. Landscape design and coordination will be refined as design advances. The Master Cooperative Agreement provides the City of Bellflower with the opportunity to review design plans as design progresses.
The City comments on retaining wall height and requests participation or review of retaining wall design.	Table 4.4.7 in the Final EIS/EIR provides a summary of the visual assessment of retaining walls within the City of Bellflower. As outlined in the Master Cooperative Agreement, coordination will continue through the advancement of design and into construction. The Master Cooperative Agreement provides the City of Bellflower with the opportunity to review design plans as design progresses.
City of Downey (Letter dated April 29, 2024)	
The recently approved Rancho Los Amigos South Campus Specific Plan is not referenced comprehensively in the Final EIS/EIR.	Section 4.1 of the Final EIS/EIR is based on the <i>West Santa Ana Branch Transit Corridor Project Final Land Use Impact Analysis Report</i> (Metro 2024a). The Final EIS/EIR identifies the Rancho Los Amigos Specific Plan (City of Downey 1989) under Section 4.1.1 and provides a summary of the LA County Rancho Los Amigos Redevelopment Project under the “Future Planning and Projects in the Vicinity of the Locally Preferred Alternative” heading. Although the Rancho Los Amigos South Campus Specific Plan (June 2021) is not directly referenced, the LA County Rancho Los Amigos Redevelopment Project summary provided in the Final EIS/EIR acknowledges that the specific plan was approved, stating “on October 1, 2021, the City of Downey certified the specific plan that reaffirms LA County’s proposed demolition of the property.”. The Final EIS/EIR accounts for the LA County Rancho Los Amigos Redevelopment Project that would be developed with the guidance of the Rancho Los Amigos South Campus Specific Plan.

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The City is concerned with truck routing near the transit station.	The traffic analysis in the Final EIS/EIR analyzed delay and level of service during the peak hours at intersections along Gardendale Street, including the intersection with Dakota Avenue. This analysis accounts for the additional traffic that would be redirected due to the closure of the westbound left-turn movement at the Gardendale Street and Dakota Avenue intersection. Based on the results of the analysis, the Final EIS/EIR identified mitigation measures at the intersections of Gardendale Street and Center Street (Mitigation Measure TRA-12) and Gardendale Street and Industrial Avenue (Mitigation Measure TRA-13). As shown in Table 3-25 in Chapter 3 of the Final EIS/EIR, with the implementation of proposed mitigation measures, there would be no adverse effect.
The City is concerned with construction effects on street trees.	Metro will comply with the relevant requirements of the local jurisdiction regarding project effects on trees during construction. Mitigation Measure BIO-4 (Protected Trees) requires an Arborist Study prior to the removal of any protected trees and the preparation of a tree protection plan. Under Project Measure BIO PM-3 (LA Metro Tree Policy), the Project will adhere to the LA Metro Tree Policy, adopted on October 27, 2022, by the Metro Board of Directors. The policy requires the preparation of a tree protection plan identifying tree protection zones for trees designated for retention. Metro will consult with the City of Downey, in addition to community stakeholders, prior to selecting the appropriate location for planting replacement trees. Additionally, the Master Cooperative Agreement provides the City of Downey with the opportunity to review design plans as design progresses.

City of Huntington Park (Letter dated April 29, 2024)

The City is concerned with impacts to traffic operations and proposed mitigation.	As documented in Section 3.5 of the Final EIS/EIR and Attachment 6 of the <i>West Santa Ana Branch Transit Corridor Final Transportation Impact Analysis Report</i> (Metro 2024s), the traffic analysis identified and evaluated multiple mitigation measures for the intersections with adverse effects from the Project. As described in Section 3.5.2.1 of the Final EIS/EIR, in developing the mitigation options, consideration was given to the benefits of the mitigation (reducing delays) and the potential for secondary impacts.
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Comment Summary	Response
	Even with the implementation of mitigation, the analysis concluded that adverse impacts would remain at 12 of the 19 intersections along the LPA alignment.
The City is concerned with impacts to parking and proposed mitigation.	The Final EIS/EIR analyzed the effects to parking by assessing how the operation of the LPA will physically affect (i.e., remove) on- and off-street parking supply, and whether the demand from transit parking will exceed the available supply of transit parking. Section 3.4 of the Final EIS/EIR summarizes that the physical loss of on-street parking would not result in adverse effects because sufficient capacity remains to accommodate parking demand. Loss of off-street parking would not result in adverse effects because parking supply would not decrease below the respective city parking code requirements. Adverse effects would not occur from spillover transit parking because a surplus of parking spaces was projected. The project also identified mitigation measures TR-19 (Parking Monitoring and Community Outreach) and TR-20 (Parking Mitigation Program [Permanent]) as additional measures to address parking concerns by working with local jurisdictions. Mitigation Measure TRA-19 includes conducting surveys within one-half mile of stations before and after the Project opens to determine if the availability for parking changes as a result of Project operation. The parking surveys will compare parking availability prior to the opening of service to the availability six months following the opening of service. Surveys will identify where parking demand within one-half mile of stations is at least 20 percent greater than the demand before opening of service (i.e., the new transit service has increased parking demand by 20 percent or more).
The City noted that mitigation measure LU-1 does not address consistency with bike trail plans.	Section 4.1.3.2 of the Final EIS/EIR addresses consistency with bike trail plans in the City of Huntington Park, including considering future bike plans along the Randolph corridor. Mitigation Measure LU-1 (Consistency with Bike Plans) will minimize the preemption of future development, goals, and plans for bicycle facilities within each affected jurisdiction. As part of this effort, Metro will prepare amended language for each affected bicycle plan demonstrating that existing, planned, and modified bicycle facilities will be connected during project operation.

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	<p>As of July 2023, the Rail to Rail/River Active Transportation (Segment B) Project would have a Randolph alignment but be located outside the railroad ROW and within the street ROW. The Metro project team continues to coordinate with the City of Huntington Park on this bike project.</p>
The City is concerned with community division	<p>As concluded in the Draft and Final EIS/EIR, the LPA will not physically divide a community. As discussed in Section 4.1.5.1, Threshold LU-1 and Section 4.2.3.2 of the Final EIS/EIR, the LPA will not introduce physical barriers or generate permanent access disruptions to existing land uses on either side of the alignment and access to the surrounding community will remain available. Existing development was built around the rail ROW, which physically separates the neighborhoods and communities. The LPA will introduce safety barriers along the alignment and stations to hinder illegal crossing of the rail tracks. Safe crossings throughout the community will be maintained at intersections and via crosswalks. Vehicular, bicyclist, and pedestrian access to the surrounding uses will be maintained by re-routing traffic to adjacent streets, and permanent access disruptions to existing land uses will not occur and will not physically divide an established community because the surrounding land uses will remain accessible.</p>
The City is concerned with residential displacement in Huntington Park	<p>As shown in Table 4.3.4 of the Final EIS/EIR, 8 multi-family units will be acquired within the City of Huntington Park, which will affect approximately 31 occupants. As noted in Section 4.3 of the Final EIS/EIR, full acquisitions of residential properties will be required to accommodate project elements such as aerial structure columns and parking facilities, and partial acquisitions of residential properties will be required to accommodate project elements such as grade crossings, aerial crossings, track alignment, and other ancillary facilities. The partial acquisitions will be minor acquisitions primarily in rear yards of properties adjacent to the rail ROW. Detailed acquisitions and displacement data by parcel is provided in the <i>West Santa Ana Branch Transit Corridor Project Final Displacements and Acquisitions Impact Analysis Report</i> (Metro 2024m). The Project will comply with the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, as amended (42 United States Code Section 61)</p>

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Comment Summary	Response
	(Uniform Act), California Relocation Act (Government Code Section 7260 et seq.), policies and procedures of Metro, and other applicable regulations related to displacements and acquisitions. Businesses and residents displaced as a result of the Project will be given advance written notice and informed of their eligibility for relocation assistance and payments before being required to move.
The City is concerned with local air quality conditions	The air quality analysis summarized in the Executive Summary is supported by the details included in Section 4.5 of the Final EIS/EIR. Localized air quality is discussed in Section 4.5.3.2 under the subheading of Project-level Transportation Conformity. No mitigation was required for air quality effects either during construction or operation of the Project.
The City is concerned with project effects to users of Salt Lake Park	There will be no acquisition of land from Salt Lake Park. A portion of the rail right-of-way adjacent to Salt Lake Park is currently used for parking under agreement with the Union Pacific Railroad and subsequently assigned to the Port of Long Beach, which has a clause for termination upon 30 days' notice. As discussed in Chapter 4, Section 4.2.3.2 and 4.16.3.2 of the Final EIS/EIR, removal of parking spaces adjacent to the park would not change access to, or use of Salt Lake Park. Other on-site and off-site parking around the park is available and will remain unaffected.
The City is concerned with potential security demands on local police	The safety and security analysis summarized in the Executive Summary is supported by the details included in Section 4.18 of the Final EIS/EIR. Comments on the Draft EIS/EIR related to security and crime prevention were addressed as CR-SAF-1 in Appendix D of the Final EIS/EIR. Comments related to law enforcement were addressed as CR-SAF-3. Safety and security concerns from the City of Huntington Park were addressed in responses to comments CC-10-16, CC-10-17, CC-10-18, CC-10-56, CC-10-57, CC-10-58, and CC-10-60 in Appendix D of the Final EIS/EIR. Security on the new rail line, including at stations, will be provided by Metro's law enforcement and its law enforcement contractors, who are assigned to the Metro system as part of their contract. These resources are separate from the City of Huntington Park's policing services.

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The City is interested in land use changes for transit oriented development near stations	Transit-oriented development near stations is addressed in response to comment CC-10-69 in Appendix D of the Final EIS/EIR. Section 4.1 of the Final EIS/EIR addresses land use compatibility. The Project is a proposed light rail transit project that will be located within street and rail rights-of-way, or within acquired properties. As a transit infrastructure project, the Project will not directly change land uses, but rather may provide opportunities for transit-oriented development/joint development around proposed rail stations consistent with the plans and policies of the city.
15230 Lakewood Boulevard (Dante Valve Company) (April 29, 2024, email, response provided via phone call and email on May 2, 2024)	
Dante Valve expressed concern that vibration mitigation is not specified at the MSF.	Vibration mitigation is described in Section 4.7.4.2 of the Final EIS/EIR under the discussion of the light rail track. The following response was sent via email on May 2, 2024: Metro responded to Dante Valve's concern through a follow up phone call explaining that the expected vibration mitigation was included in Mitigation Measure VIB-2 (Low Impact Frogs) and identified in Table 4.7.10 in the Final EIS/EIR. The mitigation commitment is presented under the discussion of the light rail track on which the track switch will be installed rather than in the discussion of the maintenance and storage facility that will be served by the access track.
9415 Burtis Street (Konoike-Pacific California, Inc.) (Letter dated April 24, 2024)	
The Final EIS/EIR identifies acquisition of the Konoike-Pacific California, Inc. (KPAC) 82,180 square foot cold storage facility at 9415 Burtis Street for use as a construction staging and laydown area and KPAC is opposed to the acquisition.	The objection is acknowledged. Metro coordinated with KPAC regarding the items noted in this letter and met with Union Pacific Railroad (UPRR) to discuss spur access to the property. In consideration of the comments from KPAC and following discussions with KPAC and UPRR, the design was refined and the spur access is not necessary for this property. No permanent acquisition of this property is required, as the property's operations will remain unaffected without a spur connection. A TCE may be required, which will be determined during final design, but the TCE will not restrict access or unreasonably interfere with business operations on the property. The design refinement

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	made in coordination with KPAC and UPRR will result in a reduction of impacts to the KPAC property compared to what was documented in the Final EIS/EIR. Metro will continue to coordinate with the property owner as needed.
KPAC claims the acquisition is for private benefit.	The acquisition of the property was identified in the Final EIS/EIR to construct and operate a public transportation system and ancillary facilities. However, following coordination with KPAC and UPRR, it has been determined that permanent acquisition is no longer necessary.
KPAC claims coordination regarding the acquisition at 9415 Burtis Street has not occurred.	In August 2021, as part of the release of the Draft EIS/EIR, notices were mailed to all properties identified as potentially requiring temporary or permanent acquisitions, including KPAC. The Final EIS/EIR was completed and made available for public review and comments on March 29, 2024. That same day, notices were again mailed to all properties potentially subject to temporary or permanent acquisitions, including KPAC. The 30-day public review period of the Final EIS concluded on April 29, 2024. The Project was listed as an agenda item for the April 15, 2024, Planning and Programming Committee Meeting (https://boardagendas.metro.net/board-report/2024-0104/). Following receipt of KPAC's letter dated April 24, 2024, Metro has engaged in discussions and coordination with KPAC to address the acquisition concerns.
KPAC claims the facility is not replicable within the City of South Gate and its acquisition would create significant economic and environmental effects.	As noted above, following coordination with KPAC and UPRR, the permanent acquisition of this property is no longer deemed necessary, as spur access is not required for the business operations at this location.
KPAC claims economic consequences related to substantial increased operator and producer costs.	As noted above, following coordination with KPAC and UPRR, the permanent, acquisition of this property is no longer considered necessary. However, a TCE may be required but will not restrict access or unreasonably interfere with business operations.

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KPAC claims use of other older existing warehouse facilities would have new or increased environmental effects related to traffic operation, freight, VMT, air pollutant emissions, noise, safety, land use, environmental justice and other unknown issues.	Any environmental effects related to use of alternative facilities due to displacement would be speculative, as no specific existing or proposed facilities have been identified. As noted above, the permanent acquisition of this property is no longer considered necessary. Therefore, the business on the property will no longer be displaced as identified in the Final EIS/EIR.
KPAC proposes other potential alternative sites for construction staging and laydown.	As noted above, following coordination with KPAC and UPRR, the permanent acquisition of this property is no longer considered necessary.
KPAC claims the Final EIS/EIR is deficient and requires supplement and recirculation for a variety of reasons.	Claims noted in the letter are addressed individually in the other responses summarized in this attachment. The Final EIS/EIR does not include substantial changes to the proposed project that are relevant to environmental concerns and there are no significant new circumstances or information relevant to environmental concerns bearing on the proposed project or its impacts. As compared to the Draft EIS/EIR, no new or substantially more severe significant adverse impacts were identified in the Final EIS/EIR.
KPAC claims that the new identification of the acquisition in the Final EIS/EIR is a substantial change to the project with new significant adverse effects not identified in the Draft EIS/EIR.	The Draft EIS/EIR identified the need for property acquisition and business displacements. Appendix B of the Draft EIS/EIR identified partial acquisition of the KPAC property. Changes between the Draft and Final EIS/EIR are described in Section 4.3 of the Final EIS/EIR. As noted on page 4-58 of the Final EIS/EIR, the design refinements resulted in overall fewer business and residential displacements for the LPA compared to Alternative 3 evaluated in the Draft EIS/EIR. Specifically, the LPA will displace a total of 58 businesses and 13 residential units compared to a total of 65 businesses and 21 residential units under Alternative 3. While there were changes between the Draft and Final EIS/EIR regarding specific acquisitions, the nature and general magnitude of acquisitions remained similar, and the differences are less than

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	significant from the perspective of land use within the Affected Area and the environmental effects of the project.
KPAC claims that the Final EIS/EIR displacement impacts analysis is flawed.	<p>Displacement information included in the Final EIS/EIR was completed following standard practice and is documented in Section 1.6 of the <i>West Santa Ana Branch Final Displacements and Acquisitions Impact Analysis Report</i> (Metro 2024). Any specific information about the use or valuation of properties that was not available during the preparation of the Final EIS/EIR will be considered in determining valuation and compensation under the Uniform Relocation Act and California Act.</p> <p>The total number of industrial properties within the City of South Gate presented in Table 4.3.5 in Chapter 4, Section 4.3.3.2 of the Final EIS/EIR, incorrectly indicates that 130 properties were available for lease and sale within the city boundary. In fact, these 130 properties were available for sale within 6 miles of the displaced property at the time of the analysis, not within the city boundary. Table 5.6 in Section 5.4.2.1 of the <i>West Santa Ana Branch Transit Corridor Project Final Displacements and Acquisitions Impact Analysis Report</i> (Metro 2024) correctly presents the total number of properties available for lease and sale within the city boundary, with 15 industrial properties available. This correction does not affect the analysis' conclusions, as a sufficient number of replacement sites are available within the city boundary, and the conclusions remain unchanged.</p>
KPAC claims the Final EIS/EIR must be recirculated identifying alternative construction staging and laydown locations.	Because the project will be constructed as identified in the Final EIS/EIR, supplemental environmental review is not required. Further, while there were modifications between the Draft and Final EIS/EIR regarding specific acquisitions, the nature and general magnitude of acquisitions remained similar and no new or substantially more severe environmental effects were identified.
KPAC claims the Final EIS/EIR is flawed based on the versions of plans and models used in the analysis.	The Final EIS/EIR analysis is based on appropriate land use planning methods and models as described in Section 4.0 of the Final EIS/EIR and are consistent with the methods used in the Draft EIS/EIR. There are no changed circumstances requiring preparation of a supplemental EIS. The Draft EIS/EIR used the California Emissions

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	<p>Estimator Model (CalEEMod) Version 2016.3.2 and the California Air Resources Board Emission FACTor (EMFAC) 2017 to estimate pollutant emissions during construction and operation because those were the models available at the time the modeling for the Draft EIS/EIR was performed. As described in Section 4.5, <i>Air Quality</i>, 4.6, <i>Greenhouse Gas Emissions</i>, and 4.12, <i>Energy</i>, of the Final EIS/EIR, the Final EIS/EIR used versions CalEEMod 2020.40 and EMFAC2021 of these modeling tools. At the time the Final EIS/EIR was prepared, CalEEMod Version 2022.1 was not final and was not available for use in the Final EIS/EIR. The technical reports prepared for the Final EIS/EIR include the <i>West Santa Ana Branch Transit Corridor Project Final RTP/SCS Study</i> (Metro 2023), which compared the 2016–2040 RTP/SCS and the Connect SoCal (2020–2045 RTP/SCS) regional forecasts to determine whether differences in growth forecasts would alter the planning and travel demand modeling assumptions included in the Draft EIS/EIR. The study also considered applicable Connect SoCal (policies to determine whether there were any major differences to those evaluated in the Draft EIS/EIR. As stated on page 4-2 of the Final EIS/EIR, based on the conclusions presented in that study, updating the analysis using the growth forecasts of Connect SoCal (2020–2045) would not be substantially different than what was presented in the Draft EIS/EIR. SCAG adopted Connect SoCal 2024 (2024–2050 RTP/SCS) on April 4, 2024, after the Final EIS/EIR was released. The LPA is included in the 2024–2050 RTP/SCS (RTP ID 1TR1011).</p>
KPAC claims that project elements identified as project measures should be excluded from the project and evaluated as mitigation.	The project measures in the Draft and Final EIS/EIR are not “mitigation measures” as defined by NEPA or CEQA because they are components of the Project design and will be implemented as part of the Project. Measures that were developed to avoid, minimize, or mitigate identified project impacts are mitigation measures, and identified as such. Both project measures and mitigation measures are commitments.

Comment Summary	Response
<p>1760 E. Slauson Avenue (Kramer Metals, Inc.) (Questions received via phone call on April 15, 2024, response sent via email on April 26, 2024)</p>	
Kramer Metals requested information about property acquisitions.	<p>The following response was sent via email on April 26, 2024:</p> <p>General design of the project in this area</p> <ul style="list-style-type: none">• The northern terminus for the West Santa Ana Branch line (now Southeast Gateway Line) at the Slauson/A Line Station will be located west of the Kramer Metals property. An aerial station will be constructed adjacent to the existing A Line station, east of the existing A Line station platform. Pedestrian bridges will connect the two platforms. The main station entrance will be located north of Slauson Avenue, with the station platform above Slauson Avenue and Randolph Street. The bottom of the aerial structure will be approximately 27 feet above grade, with vertical circulation elements (i.e., escalators, stairs, and elevators) up to approximately 70 feet above grade. The station is a center-platform design, so LRT tracks will straddle the station platform near the Kramer Metals property and run along the outer edge of the viaduct structure. See the attached Slauson/A Line Station plan sheet for additional details on the design in this area. <p>Scope of proposed taking [acquisition] on the property</p> <ul style="list-style-type: none">• The aerial Slauson/A Line Station will be constructed between the existing A Line aerial station platform and Randolph Street. Support columns are required on the east side of Randolph Street, partially affecting the private property. Two temporary construction easements, a permanent aerial easement, and two permanent partial acquisitions have been identified on this property based on the current level of design. The temporary construction easements will be required for construction activities for the aerial Slauson/A Line Station platform. The permanent aerial easement will be required where the station structure will overhang (be located above) the property. The permanent partial acquisitions will be required to

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	<p>accommodate the support columns for the aerial structure. Construction is expected to begin in 2026 with project opening in 2035.</p> <p>Proposed language of the taking [acquisition]</p> <ul style="list-style-type: none">Specific language is not identified for each property acquisition at this stage of the project, as such, general language is included in the Final EIS/EIR to describe the acquisition process. Section 4.3.3.2 of the Final EIS/EIR states: “Metro will compensate owners at fair market value to purchase the required property and will compensate owners for damages to the remainder property as applicable. Residents of fully acquired properties will be displaced, and, if eligible, will be provided relocation benefits in accordance with applicable regulations. Residents affected by partial acquisitions may also be eligible for relocation benefits. Partial acquisitions will be analyzed to determine eligible benefits. Further information will need to be obtained during discussions with owners at the time of acquisition, as further discussed directly below under the heading ‘Replacement and Relocation’.” <p>What is allowed under the aerial easement and the height of the aerial easement</p> <ul style="list-style-type: none">The bottom of the aerial structure will be approximately 27 feet above grade, with the platform level at approximately 40 feet above grade. The eastern edge of the viaduct will overhang the western portion of the Kramer Metals property. Specific requirements/restrictions below the aerial easement have not been identified at this stage of the project and would be determined during the property acquisition process. <p>Current use on the property as identified in environmental document</p> <ul style="list-style-type: none">Specific private properties are not described in detail in the Final EIS/EIR. The property is shown in the acquisition map (attached) and on design plans. No change to the overall use of the property is proposed as part of the project.

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	<p>Future restrictions to the property</p> <ul style="list-style-type: none">• Restrictions to the property have not been identified at this stage of project. Metro will work with the affected property owner during the property acquisition process, which would begin after the Federal Transit Administration issues the Record of Decision, anticipated in Summer 2024. Through the acquisition process, additional details regarding each property impact, including any potential restrictions to the property, will be further identified.
1760 E. Slauson Avenue (Kramer Metals, Inc.) (Letter dated April 29, 2024)	
Kramer Metals claims the Final EIS/EIR fails to comply with CEQA and NEPA.	This claim was made as an introductory comment followed by several pages of partial record of project development. Individual claims made under this umbrella statement are addressed below. It should be noted that Kramer Metals' comment letter was submitted after the Metro Board of Directors certified the Final EIS/EIR and approved the project on April 25, 2024. Consequently, any contentions regarding the Final EIS/EIR's compliance with CEQA are untimely.
Kramer Metals claims that the Notice of Preparation was not accurate.	The Notice of Preparation (NOP) issued on July 11, 2018, updated prior notice to reflect the range of alternatives to be included in the West Santa Ana Branch EIS/EIR. These alternatives were analyzed in detail in the Draft EIS/EIR along with alternatives that were a sub-set of those identified in the NOP. Once a locally preferred alternative was identified, additional design refinements and analysis was completed for that alternative to address comments received on the Draft EIS/EIR and stakeholder coordination. The additional design refinements and analysis are documented in the Final EIS/EIR. As noted in the document, the content of the Draft EIS/EIR was incorporated into the Final EIS/EIR by reference for efficiency.

Attachment B Summary of Comment Received on the Final EIS/EIR and Responses

Comment Summary	Response
Kramer Metals claims Metro pre-committed to the LPA in the Final EIS/EIR.	Consistent with CEQA and NEPA regulations, the Draft EIS/EIR identified a staff preferred alternative and documented the reasons for its identification. The Metro Board, based on the Draft EIS/EIR and public comment, identified the Locally Preferred Alternative (LPA) in a meeting in January 2022. The Final EIS/EIR documented the LPA, providing additional detail based on project refinements and to address comments raised on the Draft EIS/EIR. On April 25, 2024, after consideration of the public comments on the Draft EIS/EIR and Final EIS/EIR, the Metro Board approved the LPA from among the range of alternatives, including the No Build Alternative and four Build Alternatives and certified the Final EIR. Prior to that date, no final design, right-of-way acquisition, or construction was started for the project. Metro has not irreversibly and irretrievably committed resources to the LPA. No precommitment was made.
Kramer Metals claims the project definition engages in improper project segmentation.	The LPA serves the corridor between Los Angeles Union Station and Pioneer Station identified in the NOP with an operating plan that includes a combination of existing light rail transit and new guideway. The new transit guideway to be constructed has independent utility and will connect logical termini of the Slauson/A Line Station and the future Pioneer Station and serve the corridor in between. Alternative 3 in the Draft EIS/EIR, referred to as the LPA in the Final EIS/EIR, will achieve the four major elements of the Project's purpose by establishing reliable transit service, accommodating future travel demand, improving access, and addressing mobility and access constraints faced by transit-dependent communities in the corridor. As discussed in Chapter 6 of the Final EIS/EIR, Alternative 3 was identified in the Draft EIS/EIR as the Staff Preferred Alternative and environmentally superior alternative when compared to the No Build Alternative and Alternatives 1, 2, and 4 based on the trade-offs among environmental benefits and impacts. The financial capacity to construct, operate, and maintain the Project, as well as strategies to fund the Project, were also primary considerations in determining the Staff Preferred Alternative and identifying the LPA. Alternatives 1 and 2 in the Draft EIS/EIR would result in higher capital costs and more environmental impacts and mitigation measures.

Attachment B Summary of Comment Received on the Final EIS/EIR and Responses

Comment Summary	Response
	<p>The Metro Board also identified Los Angeles Union Station as the ultimate northern terminus for the corridor in the future and directed staff to begin planning studies on a future alternative connection between Los Angeles Union Station and the Slauson/A Line Station. If undertaken, that future connection would be a separate project from the West Santa Ana Branch project and subject to a separate environmental review.</p>
Kramer Metals claims that project changes made since the Draft EIS/EIR were significant.	<p>Project refinements were made after the release of the Draft EIS/EIR and before the release of the Final EIS/EIR to address stakeholder coordination and public comments on the Draft EIS/EIR and reduce impacts, as documented in Section 2.4.3.2 and Appendix E to the Final EIS/EIR. These refinements will not result in any new significant adverse impacts or any substantial increase in the severity of any significant impact identified in the Draft EIS/EIR. The refinements merely enhance the Project's integration into the community, ensuring that the LPA reflects and is responsive to the stated concerns of the public and stakeholders.</p>
Kramer Metals claims that the project description is not accurate, stable, or finite.	<p>The Build Alternatives, including the Staff Preferred Alternative, Alternative 3, are described accurately and consistently throughout the Draft EIS/EIR. Following the release of the Draft EIS/EIR, the Metro Board identified Alternative 3 as the LPA. The environmental review process includes opportunities for public involvement and consideration of public and agency comments in the development of a project. After the release of the Draft EIS/EIR, project refinements were made in response to comments on the Draft EIS/EIR and through stakeholder coordination. These refinements are documented in Appendix E of the Final EIS/EIR and assessed in the Final EIS/EIR.</p>

Attachment B Summary of Comment Received on the Final EIS/EIR and Responses

Comment Summary	Response
Kramer Metals claims that the Draft and Final EIS/EIR fails to provide an accurate assessment of acquisitions and displacements.	<p>The Draft EIS/EIR identified properties from which acquisitions would be required, including from Kramer Metals as shown on Sheet R-1-127 of Appendix B of the Draft EIS/EIR. Appendix H of the Draft EIS/EIR identified approximately 900 square feet of temporary and permanent right-of-way need from the property. Appendix B of the Final EIS/EIR, Sheet R-1-101 shows the limits of the partial acquisition required from Kramer Metals. The identified acquisition footprint increased by 300 square feet for a total of approximately 1,200 square feet. The Draft and Final EIS/EIR documented that valuation and compensation will be performed under the Uniform Relocation Act and California Relocation Act and Kramer Metals will be eligible for compensation as provided for in those acts.</p>
Kramer Metals claims that design refinement between the Draft and Final EIS/EIR that resulted in a change in the specifics of the partial acquisition of their property would affect their business operation.	<p>The design refinements in the Final EIS/EIR included approximately 300 additional square feet from the approximately 16,500 square feet of parcels compared to what was identified in the Draft EIS/EIR. The acquisition would be in the same general area identified in the Draft EIS/EIR. The acquisitions include:</p> <ul style="list-style-type: none">• two temporary construction easements,• one permanent aerial easement, and• two permanent partial acquisitions. <p>The temporary construction easements will be required for construction activities for the aerial Slauson/A Line Station. These easements will only be required during construction.</p> <p>The permanent aerial easement will be required where the station structure will overhang (be located above) the property.</p> <p>The permanent partial acquisitions will be required to accommodate the support columns for the aerial structure.</p> <p>The aerial easement and partial acquisitions comprise a small portion of Kramer Metals. Because the changes are limited in size, the easements and partial acquisitions are not anticipated to change the functional use of the property or affect operations or access to the property.</p>

Attachment B Summary of Comment Received on the Final EIS/EIR and Responses

Comment Summary	Response
	<p>Metro will continue to coordinate with Kramer Metals regarding this property. Consistent with all acquisitions required by the project, Metro will provide just compensation for identified eligible businesses and residences as required under the Uniform Relocation Act and California Relocation Act. The differences between the Draft and Final EIS/EIR were minor and impacts would be less in either case as documented in Section 4.3 of the Draft and Final EIS/EIR.</p>
Kramer Metals claims that the refined noise analysis incorporated in the Final EIS/EIR does not support that the refinements would not cause new severe impacts and that impacts to potential future residential use is not considered.	<p>As documented in Section 4.7 of the Final EIS/EIR, refinements to mitigation design and analysis reduced the number of noise-sensitive receivers that would experience noise impacts between the Draft and Final EIS/EIR. Refinements to the analysis included updated modeling to reflect refinements to the LPA, such as updated operational information, opening previously closed at-grade crossings, and closing previously open at-grade crossings. Additionally, assumptions were updated regarding audible warning devices, such as lowering the noise level of warning bells to the minimum allowable level and incorporating signal bell shrouds and gate-down-bell-stop variance at crossings located near sensitive receivers. Updates to mitigation included refined soundwall design at at-grade crossings to bring the edge of the soundwall to the pedestrian crossing. This will minimize the gap in the soundwall and increase noise-reduction benefits. The mitigation also includes consideration of increasing the height of soundwalls. Please refer to Figures 4.7-5 through 4.7-11 in the Final EIS/EIR to see the locations of noise-sensitive receivers that would experience noise impacts after mitigation. Future development that does not already have building approval would be responsible for design and development that is compatible with the approved transit project.</p>
Kramer Metals claims that the cumulative analysis is flawed.	<p>Cumulative effects are addressed in Section 4.21 of the Final EIS/EIR. A future alternative transit connection between Los Angeles Union Station and the Slauson/A Line Station is in an early conceptual planning stage and has not been approved, planned, or programmed for completion. The definition or timeline for completion of any such project would be speculative; therefore, it was not included in the cumulative analysis. Should such a project be defined in the future, it would undergo individual CEQA, and if appropriate, NEPA analysis.</p>

Attachment B Summary of Comment Received on the Final EIS/EIR and Responses

Comment Summary	Response
Kramer Metals claims that project elements identified as project measures should be excluded from the project and evaluated as mitigation.	The project measures in the Draft and Final EIS/EIR are not “mitigation measures” as defined by NEPA or CEQA because they are components of the Project and will be implemented as part of the Project. The Draft and Final EIS/EIR identified thresholds of significance and assessed whether the project’s construction and operation would exceed those thresholds. Measures that were developed to avoid, minimize, or mitigate identified project impacts are mitigation measures, and identified as such. Both project measures and mitigation measures are commitments.
Kramer Metals claims that the identification of the environmentally superior alternative was improper, at least partially based on their claim of segmentation and range of alternatives considered.	The environmentally superior alternative was initially identified in Chapter 6 of the Draft EIS/EIR and confirmed with refined analysis in Chapter 6 of the Final EIS/EIR. Each of the alternatives included in the range of build alternatives is potentially feasible, would meet the basic Purpose and Need of the Project and provide transit connections between downtown Los Angeles and Pioneer Station, either through a transfer or a one-seat ride. Chapter 6 documents the holistic consideration of tradeoffs between the alternatives and explains the factors considered in identifying the LPA as the environmentally superior alternative.
Kramer Metals claims that the Final EIS/EIR is a post-hoc rationalization of prior decisions.	The Draft and Final EIS/EIR assessed the environmental effects of proposed actions prior to making decisions. The environmental process also provides opportunities for public review and comment on those evaluations. On April 25, 2024, after consideration of public and agency comments on the Draft EIS/EIR and Final EIS/EIR, the Metro Board approved the LPA from among the range of alternatives, including a No Build Alternative and 4 Build Alternatives and certified the Final EIR under CEQA. Similarly, the FTA considered public and agency comments on the Draft EIS/EIR and Final EIS/EIR, prior to preparation of the ROD. The Record of Decision (ROD) is the conclusion of the NEPA process and is the final statement of environmental determinations and federal decisions.

Attachment B Summary of Comment Received on the Final EIS/EIR and Responses

Comment Summary	Response
Kramer Metals claims that changes to the proposed action were so substantial that the EIS/EIR requires supplement and recirculation.	As stated in Section 6.4 of the Final EIS/EIR, the project refinements are not substantial and the Final EIS/EIR does not include significant new information, such as new significant adverse impacts, or a substantial increase in the severity of any significant impact identified in the Draft EIS/EIR. In consideration of public comments, refinements to design and additional mitigation have been included to further reduce impacts compared to those identified in the Draft EIS/EIR.
Kramer Metals notes that the EIS process was not completed within the timelines included in 40 CFR 1501.10.	The 2020 CEQ update to the NEPA Regulations contained in 40 CFR 1501.10 that established timelines for NEPA review apply to new projects initiated after that date. As stated on page 4-1 of the Draft EIS/EIR, the analysis in the Draft EIS/EIR was initiated prior to the 2020 update to the NEPA regulations; therefore, pursuant to 40 CFR 1506.13, the NEPA regulations that were in place prior to September 14, 2020, applied.
Kramer Metals claims that the Final EIS/EIR does not meet the requirements of CEQA Guidelines 15132.	The Draft EIS/EIR is incorporated by reference into the Final EIS/EIR; therefore, by definition it is included along with the revised content provided in the Final EIS/EIR.

2672 and 2680 Randolph Street (Mike Patel) (April 4, 2004, phone message, response provided via email on April 15, 2024)

Property previously identified as TCE; why is this now a full acquisition? These properties provide affordable housing. Why is this acquisition needed at this intersection if it's not a major intersection?	The following response was sent via email on April 15, 2024: Permanent full acquisitions of these two properties are required because the project will result in permanent impacts to three existing structures on the sites. Specifically, Randolph Street will be realigned, and the intersection of Randolph Street/Seville Avenue modified to accommodate the Pacific/Randolph Station and new rail alignment. The realignment along Randolph Street requires shifting the existing sidewalk adjacent to the properties to the south. The Draft EIS/EIR also included realignment of Randolph Street, however, the design was modified for the Final EIS/EIR to include a longer left turn pocket from Randolph Street to Seville Avenue and a wider sidewalk along Randolph Street adjacent to the properties. These refinements resulted in a further shift of the sidewalk to the south and closer to an additional building associated with the properties. Due to the distance between the buildings and the existing sidewalk there is
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Attachment B Summary of Comment Received on the Final EIS/EIR and Responses

Comment Summary	Response
	<p>insufficient space to accommodate the realigned sidewalk without affecting the building. Acquisition and relocation would be provided per federal and state requirements. Even though the Draft EIS/EIR assumed a partial acquisition of these two properties, the plan set that was included in the Draft EIS/EIR identified two of the buildings as affected structures. Relocation of the business on the properties was assumed in the analysis of displacements associated with the project because the structures would be affected. The Final EIS/EIR plan set identifies that the realigned sidewalk would affect three of the buildings on the properties based on the current level of design.</p>

6101 Santa Fe Avenue (Robert Lee) (April 3, 2024, email, response provided via email on April 15, 2024)

He wants to know the acquisition type and potential impact that could affect the business or property rights.	The following response was sent via email on April 15, 2024: A temporary construction easement and permanent partial acquisition have been identified on this property based on the current level of design. The temporary construction easement will be required to construct the realigned sidewalk on the north side of the property and curb ramp at the northeast corner of the property. The existing sidewalk along the north side will be reconstructed to accommodate the realignment of Randolph Street and modifications at the Randolph Street/Santa Fe Avenue intersection required to accommodate the project. Specific construction durations have not been determined at this time but will be communicated to the property owner during the acquisition process. The permanent partial acquisition will be required to accommodate the footprint of the reconstructed curb ramp. This permanent acquisition will not affect the structure on the property.
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Attachment B Summary of Comment Received on the Final EIS/EIR and Responses

Comment Summary	Response
<p>6250 S. Boyle Avenue (Kyle Hammerstein on behalf of FR/Cal Boyle Street, LLC) (April 9, 2024, email, response provided via email on April 19, 2024)</p> <p>The portion of the property potentially being acquired is shown on page 370 of the EIR PDF (top right corner). In order to fully understand the negative impacts of this potential partial acquisition, can you please advise what this partial acquisition is planned to be used for?</p>	<p>The following response was sent via email on April 19, 2024:</p> <p>A temporary construction easement and permanent partial acquisition have been identified on this property based on the current level of design. The temporary construction easement will be required to construct the realigned sidewalk on the west side of the property. The existing sidewalk along the west side will be reconstructed to accommodate the realignment of South Boyle Avenue and modifications at the Randolph Street/State Street intersection required to accommodate the project. Specific construction durations have not been determined at this time but will be communicated to the property owner during the acquisition process. The permanent partial acquisition will be required to accommodate the realigned street and sidewalk. This permanent acquisition will not affect the structures on the property but will affect 12 parking stalls along the west side of the property, which is less than 5% of the total parking on the site.</p>
<p>13919 Arthur Avenue (Adam Parker) (April 24, 2024, email, response provided via email on May 6, 2024)</p> <p>Included a request on where to direct future correspondence about the project. Additionally, email included the following questions:</p> <ol style="list-style-type: none">1. Based on the information at the June 2023 meeting, it looked like there might be a temporary construction easement on the northwest corner of our property, as marked. Is that still the current plan?2. As seen in the "Appendix B_Final Advanced Conceptual Design Part	<p>The following response was sent via email on May 6, 2024:</p> <ol style="list-style-type: none">1. Yes. A temporary construction easement is still required along the western edge of the property for construction of the retaining wall for the light rail tracks. A temporary construction easement (TCE) is required for staging materials and equipment during the construction period. The property within the TCE would be returned at the end of construction.2. An 8-foot high soundwall is proposed on top of the retaining wall and bridge structure west of the property to minimize noise from the light rail alignment. Additionally, a soundwall is proposed beneath the proposed bridge structure that starts west of the property at approximately the midway point to minimize noise from the at-grade freight tracks that travel parallel to and just west of the light rail

Attachment B Summary of Comment Received on the Final EIS/EIR and Responses

Comment Summary	Response
<p>1," it looks like the current plan is to build an 8 foot sound wall on top of a retaining wall along the entire length of our property line and this project. Is that correct? Or is there a 16 foot sound wall that starts at the ramp as well?</p> <p>3. It looks like the current plan is for a ramp to be built to take the light rail trains from grade to the planned aerial station at Paramount/Rosecrans, and the start of this ramp would roughly be behind our property. Is that correct?</p>	<p>alignment. The soundwall will extend from the ground to the bottom of the LRT structure for the entire length of the property.</p> <p>3. Yes. The profile of the light rail tracks will start to rise approximately 300 feet south of I-105.</p>

4570 Ardine Street (Titan Terminal) (April 17, 2024, email, response provided via email on April 19, 2024)

Compared the Draft and Final EIS/EIR. Inquired on the easements identified on the property for the crossing at Ardine and Salt Lake and relocation of the freight line. Additionally inquired on the number of parking spaces effected.	The following response was sent via email on April 19, 2024: The difference between Final the EIS/EIR and the plans is related to what is on private property vs within Ports-owned ROW. The loss of off-street parking identified in Table 3-18 in the Final EIS/EIR identifies parking removed on private property, with the environmental analysis focused on compliance with the parking code from the applicable city. As shown in this table, 3 parking spaces on the private property would be removed to accommodate the project. A portion of the existing parking lot/parking spaces at 4570 Ardine Street is located in Ports-owned ROW. Based on our records, the company currently has a lease agreement with the Ports to lease the portion of the ROW for the unloading of hazardous and non-hazardous products. Section 3 of the lease agreement identifies that the agreement can be terminated with a 30-day notice. Therefore, as these parking spaces are not located on private property and the lease agreement between the property owner and the Ports has a
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Attachment B Summary of Comment Received on the Final EIS/EIR and Responses

Comment Summary	Response
	<p>termination clause, the loss of these parking spaces was not included in the analysis from a code compliance standpoint.</p> <p>Metro will continue to work with the property owner during the property acquisition process to determine if there are ways to minimize the loss of parking on the private property or offset the loss of these 3 parking spaces. We will reach out to schedule a meeting in the coming months, as we advance design after project approval and coordinate further with Ports and UPRR.</p>
Faraz Aqil (Downey Resident) (April 29, 2024, email, response provided via email on June 6, 2024, with an update provided to Faraz Aqil on July 23, 2024)	
1. Concerned that the transit line will affect response times of LA County Fire Station #57 because of the at grade crossing at Gardendale Street.	<p>The following response was sent via email on June 6, 2024:</p> <p>Emergency response times were addressed in Chapter 4, Section 4.18.3.2 under the subheading “Emergency Response Services” in both the Draft and Final EIS/EIR. It explains that Metro, in coordination with local jurisdictions, will develop traffic management plans to reduce delays in response times for emergency service providers. As part of the LPA, gate operations at grade crossings will be configured per standards of the California Public Utilities Commission and the traffic mitigation measures. Coordination and operational requirements will minimize the potential impacts on emergency service providers and response times.</p>
2. Requested Metro reduce the number of businesses being displaced and provided suggestions. Also suggested placing Pioneer Boulevard Station parking underground to reduce business displacements. The commenter also noted that 3 businesses were identified as a displacement, but it did not appear that they were displaced as a result of the parking	<p>The design of the multi-floor Pioneer Station parking structure reduces property acquisition needs and displacements compared to a surface parking lot. The cost to construct underground parking would be higher than that of a multi-floor parking structure.</p> <p>The following response was sent via email on June 6, 2024, with an update provided on July 23, 2024:</p> <p>The Pioneer Station park-and-ride structure has been designed as a multi-floor parking structure, which reduces property acquisition needs and displacements compared to constructing surface parking. Cost and engineering considerations generally make</p>

Attachment B Summary of Comment Received on the Final EIS/EIR and Responses

Comment Summary	Response
structure. Also noted that 3 businesses operate at 18743 Pioneer Boulevard but noted the property is not shown as an acquisition.	<p>construction of underground parking less optimal than adding additional above ground levels to provide a given number of parking spaces within a fixed area.</p> <p>The response provided on June 6, 2024, noted that the property with the address of 18743 Pioneer Boulevard, Artesia, CA 90701 is already owned by Metro. For this reason, the property is not shown as an acquisition in the Final EIS/EIR. However, business displacements for the property are included in the analysis for the project because the businesses that operate on the Metro-owned property will be relocated as part of the Project.</p> <p>The update provided to Faraz Aqil on July 23, 2024, stated that the property is not currently owned by Metro but will be acquired by Metro for the Southeast Gateway Line Project. This does not change the information included in the Final EIS/EIR regarding displacements.</p>
3. Concerned at-grade crossing gate down times will affect auto and pedestrian movement and create vehicle queueing. Also opposed to signalizing additional intersections.	<p>Section 3.5.2.1 of the Final EIS/EIR identified multiple mitigation measures for the intersections with adverse effects from the Project. Even with the implementation of mitigation measures, the analysis concluded that adverse impacts would remain at 12 of the 19 intersections along the LPA alignment.</p> <p>The following response was sent via email on June 6, 2024:</p> <p>As noted in common response CR-GEN-4 in Appendix D of the Final EIS/EIR, the Metro Board-approved <i>Grade Crossing Safety Policy for Light Rail Transit</i>, prepared in December 2003 and revised in October 2010, was used to determine locations for grade separation for the Project. This policy provides a systemwide standard methodology in Los Angeles County to determine whether grade crossings along light rail transit lines should be grade separated or at-grade. Key factors in evaluating the need for a grade separation include traffic volumes, train frequency, safety considerations, and a variety of special circumstances (e.g., vertical engineering alignment considerations, effects on traffic operations, pedestrian activity, and adjacent land uses). Based on the Metro Grade Crossing Policy, areas that satisfied the grade separation criteria along the LPA alignment were identified and evaluated.</p>

Attachment B Summary of Comment Received on the Final EIS/EIR and Responses

Comment Summary	Response
	<p>Metro will continue to coordinate with staff from the California Public Utilities Commission as design advances regarding the design of the Project at each at-grade crossing. If design refinements are identified as design advances and coordination continues, such refinements may be subject to environmental re-evaluation under NEPA and/or CEQA.</p> <p>As documented in Section 3.5 of the Final EIS/EIR and Attachment 6 of the <i>West Santa Ana Branch Transit Corridor Final Transportation Impact Analysis Report</i> (Metro 2024s), the traffic analysis identified and evaluated multiple mitigation measures for the intersections with adverse effects from the Project. As described in Section 3.5.2.1 of the Final EIS/EIR, in developing the mitigation options, consideration was given to the benefits of the mitigation (reducing delays) and the potential for secondary impacts. The results from this analysis concluded that adverse impacts would remain at 12 of the 19 intersections along the LPA alignment as no feasible mitigation measure was identified to fully mitigate the impact to level of service.</p>
4. Inquired if there is a plan for a future station in Cerritos at 183rd Street and Gridley Road and if the system will be extended to Bloomfield Avenue or into Orange County.	<p>An extension of the Project to the south or into Orange County is not included in Metro's current long-range transportation plan.</p> <p>The following response was sent via email on June 6, 2024:</p> <p>The Project does not include a station at 183rd Street and Gridley Road in Cerritos; however, the alignment has been designed not to preclude a station at that location. A station was previously considered at that location and eliminated by the Metro Board of Directors in November 2018 due to lack of community support, limited ridership potential, and the proximity to the Pioneer Station in the City of Artesia. Metro's current long-range transportation plan, Our Next LA, does not currently include an extension of the Project to the south.</p>

Summary of Comments Received after close of ROD Comment Period and Responses

Comment Summary	Response
<p>1760 East Slauson Avenue (Kramer Metals, Inc.) (Letter dated May 8, 2024)</p> <p>Follow-up to March 29 letter received from Metro. Property owner is objecting to the Metro Board making a determination under CEQA before the NEPA review period leading to this ROD was concluded. The letter also included various other claims regarding the CEQA process, the Property owner's desire for additional notifications and communication, and availability of the Final EIR to the Metro Board.</p>	<p>The requirements and the findings of CEQA are parallel and separate from NEPA. The Final EIS/EIR was completed and made available for public review and comments on March 29, 2024. The CEQA Guidelines do not require a specific public notice when a Final EIS/EIR is published. The 30-day public review period of the Final EIS, satisfying NEPA availability requirements, concluded on April 29, 2024. The Los Angeles County Metropolitan Transportation Authority (Metro) Board at its April 25, 2024, regular Metro Board Meeting, certified the Final EIS/EIR and adopted the Findings of Fact and Statement of Overriding Considerations pursuant to CEQA. The Metro Board also adopted the Mitigation Monitoring and Reporting Plan. The Project was listed as an agenda item for the April 15, 2024, Planning and Programming Committee Meeting (https://boardagendas.metro.net/board-report/2024-0104/).</p> <p>Throughout the design and environmental process, Metro communicated with Kramer Metals regarding impacts to parcels APN 6009-002-012 and APN 6009-002-025. The Project will comply with the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, as amended (42 United States Code Section 61) (Uniform Act), California Relocation Act (Government Code Section 7260 et seq.), policies and procedures of Metro, and other applicable regulations related to displacements and acquisitions. Businesses and residents displaced as a result of the Project will be given advance written notice and informed of their eligibility for relocation assistance and payments before being required to move.</p> <p>Prior to the April 25, 2024, meeting, the Metro Board received a Board Report with staff recommendations to consider and summaries of the project background, CEQA and NEPA discussion, community outreach efforts, safety effects, financial effects, equity platform, implementation of strategic plan goals, alternatives considered, and next steps. A direct link to the Final EIS/EIR was provided to the Metro Board for review and consideration (https://www.metro.net/projects/southeastgateway/).</p>

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Comment Summary	Response
	<p>Metro satisfied CEQA requirements in the certification of the Final EIS/EIR and public noticing by adequately providing notice of public availability of the Final EIS/EIR and providing information to keep the public informed of project updates.</p>
12106 Center Street (MDH Burner and Boiler Company) (May 1, 2024, email, response sent via email on May 6, 2024)	
Noted that the driveway to the property would be removed and not reconstructed and wanted to dispute the design/decision.	<p>The following response was sent via email on May 6, 2024:</p> <p>The driveway identified by the property owner will require demolition to accommodate grade crossing equipment, such as crossing gates and signage for the Main Street at-grade crossing. Driveways and intersections near at-grade crossings that allow for vehicular movements within the at-grade crossing are not encouraged due to safety considerations. Under existing conditions, this driveway is approximately 28 feet from the mainline freight track and is located on the inside of the crossing gates (between the crossing gate and the track). With the shift of the freight tracks to the west that is proposed with the Project, the existing driveway would only be approximately 5 feet from the proposed freight track centerline, which would not meet design standards. The driveway would also still be located between the crossing gates and freight track and given the distance there could be safety concerns if this driveway were maintained. Therefore, the driveway will not be reconstructed in order to eliminate this potential safety concern and accommodate grade crossing features. Note that the entrance on Center Street would be maintained. Additional coordination will occur with the property owner during the formal real estate acquisition process, which is scheduled to begin in summer 2024, as part of the design advancement.</p>
2672 and 2680 Randolph Street (Mike Patel) (Letter dated May 10, 2024)	
Mr. Patel followed up to earlier correspondence about the acquisition of properties on Randolph Street, stating that the properties house low-income guests for	In August 2021, as part of the release of the Draft EIS/EIR, notices were mailed to all properties identified as potentially requiring temporary or permanent acquisitions. Acquisition of the properties noted was identified in the Draft EIS/EIR, including displacement of the Randolph Hotel. Specifically, Figure 4.3-8 of the Draft EIS/EIR

Attachment B Summary of Comment Received on the Final EIS/EIR and Responses

Comment Summary	Response
extended periods. He requested individual outreach, an amended NEPA and CEQA process and action by the Metro Board regarding the properties.	identified the property as a potential displacement. This information was available for discussion during open houses and hearings on the Draft EIS/EIR. No comments regarding the use or proposed acquisition of this property were received during the Draft EIS/EIR comment period. Section 6.4 of the Final EIS/EIR details the outreach efforts during the Draft EIS/EIR comment period.
Elmer Elizondo (May 6, 2024, email; response provided via email on June 28, 2024)	
Concerned with safety and delays if the project shares tracks with freight trains. Commented that the Project should be parallel to the A Line and that the Slauson Station should be improved. He also noted that the project should extend to LA Union Station.	The following response was sent via email on June 28, 2024: The light-rail transit system will operate on separate tracks from the freight rail. Additionally, the Project will operate on tracks separate from the A Line. Design of the Slauson/A Line Station that will be constructed as part of the Project considers pedestrian access as well as transfers between the new station and the existing A Line station. <i>The West Santa Ana Branch Transit Corridor Project Slauson/A Line to LA Union Station Segment Study</i> is underway and is evaluating cost-effective options for the approximately 4.5-mile segment along Alameda Street from LA Union Station to the Slauson/A Line Station.
Richard Garcia (May 3, 2024, email, response provided via email on May 9, 2024)	
Mr. Garcia requested the estimated construction start date.	The following response was sent via email on May 9, 2024: Construction is expected to start in 2026 with the forecasted opening in 2035.

WEST SANTA ANA BRANCH TRANSIT CORRIDOR PROJECT

**Comments Received During the Final EIS/EIR
Comment Period**



REGION 9

SAN FRANCISCO, CA 94105

April 26, 2024

Rusty Whisman
Transportation Program Specialist
Federal Transit Administration, Region 9
Los Angeles Metropolitan Office
888 South Figueroa, Suite 440
Los Angeles, California 90017-5467

Subject: Final Environmental Impact Statement for the West Santa Ana Branch Transit Corridor Project, Los Angeles, California. (EIS No. 20240055)

Dear Rusty Whisman:

The U.S. Environmental Protection Agency has reviewed the above-referenced document. Our review and comments are pursuant to the National Environmental Policy Act, Council on Environmental Quality regulations (40 CFR Parts 1500-1508), and our NEPA review authority under Section 309 of the Clean Air Act. The CAA Section 309 role is unique to the EPA. It requires the EPA to review and comment publicly on any proposed federal action subject to NEPA's environmental impact statement requirement.

The U.S. Federal Transit Administration and the Los Angeles County Metropolitan Transportation Authority propose to improve the overall mobility and connectivity with reliable transit service for future and current historically underserved and transit-dependent communities by adding a new 20-mile light rail transit line connecting downtown Los Angeles to southeast Los Angeles County.

The EPA provided comments in response to the Draft Environmental Impact Statement/Environmental Impact Report on September 28, 2021. We note that FTA and Metro had previously identified Alternative 3 as the Staff Preferred Alternative and the Metro Board has confirmed this alternative as the Locally Preferred Alternative (LPA) following the circulation and consideration of public comments on the combined Draft EIS/EIR. In our comment letter, we recommended that the Final EIS/EIR address potential impacts to air quality, environmental justice, aquatic resources, and Superfund sites. We appreciate that FTA and Metro have responded to and addressed many of the EPA's recommendations. Please consider the following remaining recommendations to commit to as FTA and Metro prepare the Record of Decision (ROD).

Air Quality

The EPA appreciates the additional studies undertaken to characterize existing freight train activity within the Project area under the LPA, as well as the particulate emissions associated with LPA operations. As presented in Table 4.19.10 of the Draft EIS/EIR, while construction of the LPA will not result in any exceedances of applicable South Coast Air Quality Management District (SCAQMD) regional thresholds for any air pollutant, including nitrogen oxide (NOx) emissions, NOx impacts are projected to be 98.4 lbs/day while the threshold is 100 lbs/day.

Recommendation for the ROD:

- We encourage FTA and Metro to continue to engage with SCAQMD during the project design and build phase, in order to identify and adopt any additional mitigation measures to reduce NOx emissions during the construction phase.

Environmental Justice

The EPA acknowledges FTA and Metro's extensive efforts to update the traffic analysis and mitigate adverse traffic effects in the Final EIS/EIR. Metro has also indicated that it will continue to coordinate with affected jurisdictions during all phases of the Project.

Recommendation for the ROD:

- Commit to maintaining continuous community engagement through the construction phase to identify, elevate, and mitigate community impacts arising during Project implementation.

Aquatic Resources

The EPA appreciates the extensive aquatic resource impact analysis already completed in the Draft EIS/EIR as well as the finding of no adverse effects to aquatic resources from the Project. We also acknowledge that the Final EIS/EIR has committed to ongoing coordination with stakeholders throughout project development, including the Los Angeles Regional Water Quality Control Board.

Superfund Sites

The EPA acknowledges FTA and Metro's continuous engagement with the EPA Remedial Project Manager, Sharissa Singh (Singh.Sharissa@epa.gov, (213) 244-1809)), to coordinate activities around the three Superfund sites near the Project area. In addition, we appreciate your commitments to prepare a Soil Management Plan and give timely notification as described in Project Measures HAZ PM-3 and HAZ PM-9. The EPA is committed to continuing to support both the proposed soil and groundwater management strategy as well as engaging with the community to address concerns related to the Superfund sites.

Recommendation for the ROD:

- In the Soil Management Plan, include separate provisions for the testing and disposal of nonhazardous and hazardous soils and identify facilities that will accept the contaminated

soils unearthed during Project implementation. Confirm in the ROD that the impacts associated with the transport of both nonhazardous and hazardous soils away from the Project site have been considered and mitigated.

Thank you for the opportunity to review the Final EIS/EIR. We would appreciate receiving an electronic copy of the ROD once it has been signed. If you have any questions, please contact me at (213) 244-1834 or donez.francisco@epa.gov, or Ting-Sheng Liao, the lead reviewer for this project, at (415) 972-3558 or liao.ting@epa.gov.

Sincerely,

Francisco Dóñez
Acting Manager
Environmental Review Section 2

cc: Charlene Lee Lorenzo
Senior Director, Federal Transit Administration

Meghna Khanna
Project Manager, Los Angeles Country Metropolitan Transportation

Sam Wang
Program Supervisor, CEQA IGR, Planning, Rule Development & Area Sources, South Coast Air Quality Management District

PUBLIC UTILITIES COMMISSION

320 W 4th Street, Suite 500
Los Angeles, CA 90013



April 29, 2024

ENV 2021080001
West Santa Ana Branch Transit Corridor Project
Los Angeles County

Meghna Khanna, Project Manager
Los Angeles County Metropolitan Transportation Authority
One Gateway Plaza, MS 99-22-7
Los Angeles, CA 90012
sgl@metro.net

SUBJECT: SCH# 2017061007; West Santa Ana Branch Transit Corridor Project - Final Environmental Impact Statement/Environmental Impact Report

Dear Ms. Khanna,

Thank you for providing us with a copy of your Final Environmental Impact Statement/Final Environmental Impact Report (FEIS/FEIR) for the West Santa Ana Branch Transit Corridor Project (Project). The California Public Utilities Commission (CPUC or Commission) staff provided comments to the project's DEIS/DEIR on September 23, 2021. In that letter we recommended that "Metro further evaluate additional grade separations and/or elimination and consolidation of proposed at-grade crossing locations. Commission staff will not support at-grade designs at crossing locations where significant and adverse impacts cannot be mitigated." The FEIS/FEIR proposes no additional grade separations, and Commission staff remain concerned about the safety of several crossings that are proposed to be at-grade.

Commission staff recommends that the Los Angeles County Metropolitan Transportation Authority (LACMTA) Board of Directors reconsider certifying the FEIS/FEIR and reiterates its request for further evaluation of grade separation or elimination of 11 proposed at-grade crossing locations where the FEIS/FEIR determined that 12 roadway intersections would experience significant and adverse impacts that cannot be mitigated by the Project. The table below lists the 11 crossing locations and 12 impacted roadway intersections.

Intersections Where Significant & Adverse Impacts Remain			
Intersection Name	Crossing Name	Existing CPUC/DOT Crossing No. (UPRR)	City
Randolph St/Alameda St (West)	Alameda St-West	001BBJ-487.50/761584V	Huntington Park
*Randolph St/Alameda St (East)	Alameda St-east	001BBJ-487.50/761584V	Huntington Park
Randolph St/Albany St	Albany St	001BBJ-487.78/761586J	Huntington Park
Randolph St/Santa Fe Ave	Santa Fe Ave	001BBJ-487.91/761587R	Huntington Park
Randolph St/Rugby Ave	Rugby Ave	001BBJ-488.12/761589E	Huntington Park
Randolph St/Pacific Blvd	Pacific Blvd	001BBJ-488.20/761590Y	Huntington Park
Randolph St/Seville Ave	Seville Ave	001BBJ-488.35/761592M	Huntington Park

Randolph St/Miles Ave	Miles Ave	001BBJ-488.55/761593U	Huntington Park
Randolph St/State St	State St	001BBJ-488.93/761596P	Huntington Park
Gage Ave/California Ave	Gage Ave	003A-5.30/810949L	Huntington Park & Bell
Gage Ave/Salt Lake Ave (West)			
Florence Ave/California Ave (West)	Florence Ave	003A-5.90/810951M	Huntington Park & Bell
Florence Ave/California Ave (East)			

* Although the FEIS/FEIR did not identify this intersection as remaining significantly impacted, Commission staff has significant safety concerns with a proposed at-grade crossing design.

The proposed alignment along the existing median of the Randolph Street/Union Pacific Railroad La Habra Subdivision freight rail corridor in the City of Huntington Park modifies 10 at-grade crossings at 10 roadway intersections by adding 2 light rail transit (LRT) tracks adjacent to an existing freight track. Eight of the 12 proposed at-grade crossing locations where significant and adverse impacts cannot be mitigated are along the Randolph Street alignment. The prospect of adding two additional LRT tracks to the existing single-track freight crossings on the railroad corridor along Randolph Street has significant safety implications to the safe, efficient movement of vehicular traffic.

As part of our mission to reduce the hazards associated with at-grade crossings, the Commission's policy is to reduce the number of at-grade crossings on rail corridors. Commission staff coordinated extensively with the LACMTA Project team to address safety concerns at proposed crossing locations identified in the FEIS/FEIR. Commission staff indicated significant safety concerns with at-grade crossings proposed at the following locations:

Alameda West and Alameda East Crossings in City of Huntington Park:

Randolph Street in the vicinity of the Alameda West and Alameda East Crossings currently experiences heavy truck traffic. Commission staff's field observations, with and without the LACMTA Project team present, identified several large semi-truck trailers negotiating turns at the intersections of Alameda West and Randolph Street and Alameda East and Randolph Street with difficulty. The Project's proposed modifications of these intersections result in more narrow and restrictive vehicle lanes that inhibit large truck turning movements. Preliminary designs presented to Commission staff and City of Huntington Park proposed ineffective modifications as mitigation measures for the safety impacts caused by introduction of 2 LRT tracks at these locations. To the west of these crossings, the alignment proposes an aerial grade separated configuration as it transitions off the LACMTA A-Line where it then is proposed to transition to an at-grade alignment less than ¼ mile west of Alameda Street West. The aerial configuration can easily be continued east past both the Alameda West and Alameda East intersections before transitioning to an at-grade alignment. The FEIS/FEIR should be modified to evaluate and clear the potential grade separation of these two crossings.

In addition, the remaining 8 impacted intersections along Randolph Street should be further evaluated for grade separation and/or elimination since the FEIS/FEIR lists them as locations with significant and adverse impacts that cannot be mitigated by the Project.

Gage Avenue Crossing in Cities of Huntington Park and Bell:

The Gage Avenue crossing is bracketed by the intersection with Salt Lake Ave immediately adjacent to the west and the intersection with California Avenue to the east. The FEIS/FEIR states that the Project “is projected to result in adverse effects on these intersections during both [am/pm] peak periods.” It continues by stating that multiple mitigation measures were considered, but many would require right-of-way acquisition and result in secondary impacts in order to add additional vehicle lanes. Significantly, the FEIS/FEIR does not evaluate grade separation of the crossing as a potential mitigation to the adverse impacts that the at-grade design creates. The proposed Project alignment is an aerial grade separated configuration to the north of Gage Avenue as it transitions off the Randolph Street/La Habra Subdivision alignment that then transitions to an at-grade configuration approximately 1/8 mile north of Gage Avenue. The aerial configuration can easily be continued south past the Gage Avenue crossing before transitioning to an at-grade configuration. This change would effectively eliminate the adverse effects on the two intersections. The FEIS/FEIR should be modified to evaluate and clear the potential grade separation of this location.

Florence Avenue Crossing in City of Huntington Park:

The Florence Avenue crossing is bracketed by the intersection with California Avenue (West) immediately to the west and the intersection with California Avenue (East) immediately to the east. The FEIS/FEIR states that after detailed evaluation, “no feasible mitigation was developed” for the Florence Avenue and California Avenue (West) intersection, and “one feasible mitigation option was identified” for the Florence Avenue and California Avenue (East) intersection. However, impacts would remain after implementation of the one feasible mitigation. The FEIS/FEIR further concludes that “adding additional lanes or lane extensions will not provide substantial reduction in vehicle delay without acquiring right-of-way. Therefore, these impacts will be unmitigable, and an adverse effect will remain.” Once again, the FEIS/FEIR does not evaluate grade separation of the crossing as a potential mitigation to the adverse impacts that the at-grade design creates.

This crossing is also adjacent to the proposed Florence/Salt Lake Station that would also need to be constructed as an elevated station if the crossing is grade separated, providing an additional safety benefit. Current LACMTA operations at ground level stations impact adjacent crossings and intersections whenever trains are delayed at station platforms. This causes extended gate down times at adjacent crossings and interferes with programmed traffic signal timing at adjacent intersections which will add to vehicle delay. Constructing the Florence/Salt Lake Station as an elevated station will eliminate any adverse impacts to the adjacent crossing and two intersections. The FEIS/FEIR should be modified to evaluate and clear the potential grade separation of this location.

Although the LACMTA Board will be certifying the overall project, the CPUC has not specifically authorized any of the proposed at-grade crossings. It is evident that much work is still ahead if LACMTA hopes to successfully address Commission staff’s safety concerns and obtain Commission approval for project construction. **Commission staff will not support at-grade designs for locations where safety concerns are not effectively mitigated.**

Should you have any questions, please feel free to contact me at (213) 576-1313 or matthew.bond@cpuc.ca.gov. Contact our lead staff on this project: Noel Takahara at (213) 576-7106 or noel.takahara@cpuc.ca.gov for transit safety certification matters and Jose Pereyra at (213) 576-7083 or jose.pereyra@cpuc.ca.gov for crossing matters.

Meghna Khanna, Project Manager
West Santa Ana Branch Transit Corridor Project
April 29, 2024
Page 4 of 4

Sincerely,

Matthew Bond

Matthew Bond, PE
Program and Project Supervisor
Rail Crossings and Engineering Branch
Rail Safety Division

cc:
State Clearinghouse



BUILDING A STRONGER L.A.

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Martin L. Adams, General Manager and Chief Engineer

April 23, 2024

Ms. Meghna Khanna
Project Manager
Los Angeles County Metropolitan Transportation Authority
One Gateway Plaza, MS 99-22-7
Los Angeles, CA 90012

Charlene Lee Lorenzo
Senior Director
Federal Transit Administration, Region 9
Los Angeles Metropolitan Office
888 South Figueroa, Suite 400
Los Angeles, CA 90017

Dear Ms. Khanna and Ms. Lorenzo:

Subject: LADWP File No. P-102111
Southeast Gateway Line – Final Environmental Impact Statement/Report
Los Angeles County Metropolitan Transportation Authority
Haynes Transmission Lines
Victorville-Century Lines
Transmission Line Right-of-Way Nos. 1B, 15A, and 24

The Los Angeles Department of Water and Power (LADWP) received the Final Environmental Impact Statement/Report (Final EIS/R) from the Los Angeles County Metropolitan Transportation Authority (LACMTA) and the Federal Transit Administration (FTA) on April 4, 2024, regarding the proposed Southeast Gate Line (formerly West Santa Ana Branch Transit Corridor Project).

The Southeast Gateway Line (Project) is a proposed light rail transit line connecting downtown Los Angeles to the City of Artesia. The light rail line will run through the cities of Artesia, Bellflower, Paramount, Downey, South Gate, Cudahy, Bell, Huntington Park, Vernon, and Los Angeles. The Project will impact the Haynes Transmission Lines, Victorville-Century Lines, and Transmission Line Right-of-Way Number 1B, 15A, and 24.

LADWP has property rights in the areas that are impacted by this proposed Project. LADWP's Transmission Lines and ancillary appurtenances (Facilities) are integral components of the Transmission Line system, which provides electric power to

Ms. Khanna & Ms. Lorenzo
Page 2
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the City of Los Angeles and other local communities (Public). Their use is under the jurisdiction of the North American Electric Reliability Corporation, and other jurisdictional government regulatory agencies. Safety and protection of these critical Facilities are paramount in consideration of the Project.

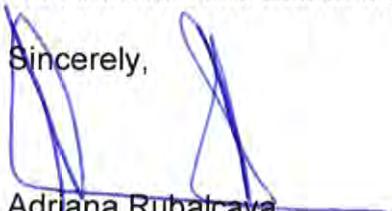
LADWP requests LACMTA and FTA to consider the LADWP's critical Facilities, and the Public, which the Facilities serve, in reviewing and/or approving the Project which affect LADWP Facilities, their operation and maintenance.

LADWP reserves the rights to review and approval where the Project affects LADWP's property and Facilities.

All inquiries concerning this matter should reference LADWP File No. P-102111.

If you have any questions or need additional information, please contact Mr. C.K. Wong, Real Estate Officer at (213) 202-0508 or by e-mail at chi.wong1@ladwp.com. You may also contact Real Estate Services at (213) 367-0564.

Sincerely,


Adriana Rubalcava
Director of Real Estate

CW:ag

From: Khanna, Meghna <KhannaM@metro.net>
Sent: Tuesday, April 23, 2024 8:41 PM
To: Fernandez, Bryan
Cc: GODEK, GWENN (Contract Professional)
Subject: RE: LA Unified - SGL FEIR

Categories: To File

Hello Bryan –

Thanks for your email.

The LA Unified was included in the distribution of the Draft EIS/R followed by a 60-day public comment period. After the circulation of the Draft EIS/EIR, the grade crossing design at Randolph Street and Miles Avenue was refined, which required updates to the design of the curb ramp and sidewalk. From an acquisition standpoint, a permanent partial acquisition and a temporary construction easement are proposed on the property. The permanent, partial acquisition is required to reconstruct the sidewalk and curb ramp located at the southwest corner of the property. The existing sidewalk along the south side of the property will be reconstructed to accommodate the realignment of Randolph Street and modifications at the Randolph Street/Miles Avenue intersection required to accommodate the project. The temporary construction easement is required to construct the sidewalk and curb ramp. No access or structures will be affected by the acquisitions. The reconstructed sidewalk will meet ADA requirements and continue to provide safe access to and from the school.

The activities noted in the email (“permanent incorporation of land” and “temporary occupancy”) are terminology specific to Section 4(f) of the US Department of Transportation Act of 1966. This act provides special protection of publicly owned land of a public park, recreation area, or wildlife and waterfowl refuge of national, state, or local significance, or land of a historic site of national, state, or local significance (as determined by the official(s) with jurisdiction over the park, area, refuge, or site). “Permanent incorporation of land” is used when land is converted to transportation right-of-way from some other non-transportation use (in this case, landscaping).

As a result of the design refinement noted above, the Area of Potential Effects used to evaluate historic resources for the project was expanded after circulation of the Draft EIS/EIR. As part of this effort, Huntington Park High School was added to the APE. Based on a record search for the project, it was found that the high school was previously evaluated by LAUSD for historical significance and was assigned CHR status code “3S” indicating the campus “appears eligible for the National Register of Historic Places or California Register of Historic Resources through survey evaluation”. The studies conducted in support of the project confirmed that the property is eligible for listing the National Register, the California Register, and for local designation in the area of architecture. As such, the high school qualifies as a historic site of national, state, or local significance, and therefore, also required evaluation as a Section 4(f) resource. The buildings located on the property, the primary reason for its significance, will not be physically altered or modified by the project. Additionally, due to the nature of the already existing urban environment, proposed alterations to the property are in keeping with its existing character and will not diminish its integrity. These findings were considered as part of the Section 4(f) analysis.

The property acquisition process does not begin until after the Record of Decision is issued for the project. This is currently anticipated for June/July 2024.

The Metro team can meet with you to discuss the next steps related to design advancement, project schedule, etc.

Thanks,

Meghna Khanna, AICP

LA Metro

Deputy Executive Officer

Countywide Planning & Development

213.922.3931 (work)

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From: Fernandez, Bryan <cp-bryan.fernandez@lausd.net>

Sent: Monday, April 15, 2024 10:39 AM

To: Khanna, Meghna <KhannaM@metro.net>

Cc: GODEK, GWENN (Contract Professional) <gwenn.godek@lausd.net>

Subject: LA Unified - SGL FEIR

Meghna Khanna,

I am Bryan Ramos Fernandez and I'm a CEQA Project Manager at LA Unified's Office of Environmental Health and Safety. We received the FEIR and are reviewing the document. The LPA passes by four LA Unified schools: Lillian Elementary School, Huntington Park High School, San Antonio Elementary School, and Legacy High School.

Huntington Park SH

In the FEIR Section 5.4.1.3, it states" "Based on the discussion below, the LPA will result in permanent incorporation of land within portions of Huntington Park High School and temporary occupancy during construction." Please confirm when Metro received approval from the District for this activity on its school.

Based on the project website, <https://storymaps.arcgis.com/stories/56be2979ece848ee9593adf92f2b79d9>, could you confirm that this is the location described in Section 5.4.13?



Sincerely,

Bryan Ramos Fernandez, AICP

CEQA Project Manager

Contract Professional

Los Angeles Unified School District (LAUSD)
Office of Environmental Health and Safety (OEHS)
333 S Beaudry Ave., 21st Floor, Los Angeles, CA 90017
O: (213) 241-4210
cp-bryan.fernandez@lausd.net

Los Angeles Unified School District

Office of Environmental Health and Safety

ALBERTO M. CARVALHO
Superintendent of Schools

CARLOS A. TORRES
Director, Environmental Health and Safety

JENNIFER FLORES
Deputy Director, Environmental Health and Safety

April 29, 2024

Submitted via electronic mail

Meghna Khanna
Project Manager
Los Angeles County Metropolitan Transportation Authority
One Gateway Plaza, M/S 99-22-7
Los Angeles, CA 90012

PROJECT NAME: West Santa Ana Branch Transit Corridor Project Final Environmental Impact Statement/ Environmental Impact Report
CASE NUMBER: SCH#: 2017061007

Presented below are comments submitted on behalf of the Los Angeles Unified School District (LAUSD or LA Unified) regarding the project to construct and operate the West Santa Ana Branch Transit Corridor (aka Southeast Gateway Line), a 14.5-mile light rail line (Locally Preferred Alternative). The Project will include nine stations; five parking facilities; 58 street, river, freeway, and freight crossings; 17 TPSS facilities, and 8.7 miles of freight realignment. The Project will also include removal of existing parking spaces, temporary and permanent acquisitions of properties, several miles of soundwalls, and relocation of utility infrastructure that will occur on or around LA Unified School District school sites. Major components of the LPA construction include guideways and trackwork (at-grade and aerial), grade separations, roadway modifications, utility relocations, station platforms (at-grade and aerial), an MSF, parking facilities, and supporting systems facilities (e.g., TPSSs). Portions of the LPA will share the rail ROW with active freight operators and require relocation of freight tracks.

The Final EIS/EIR delineates an Affected Area north of the Los Angeles River that is served by LA Unified School District and the Project will directly impact multiple District-owned schools. The Project directly abuts or within 500 feet of the following LA Unified School District schools:

- Lillian Elementary School, 352 students
- Linda Esperanza Marquez High School, 1,925 students
- Huntington Park High School, 1,463 students
- San Antonio Continuation High School, 87 students
- San Antonio Elementary School, 463 students
- Teresa Hughes Elementary School, 577 students
- Legacy High School Complex, 1,897 students

There are District school sites that are in the Affected Area¹ excluded from the list of schools in the Final EIR/EIS:

- Tweedy Learning Center, 5115 Southern Avenue, South Gate, CA 90280

¹ Figure 4-2: *Educational Facilities in the Affected Area (Los Angeles to Paramount)* and Table 4-5: *Education Facilities Within 0.25 Mile of the LPA Project Footprint* of Section 4.13 (Educational Facilities in Proximity to Hazardous Materials)

- Corona Avenue Elementary School, 3825 Bell Avenue, Bell, CA 90201
- Chester W. Nimitz Middle School, 6021 Carmelita Avenue, Huntington Park, CA 90255
- Huntington Park Elementary School, 6055 Corona Avenue, Huntington Park, CA 90255

The Project as presented in the Final EIS/EIR significantly uses District resources such as school property and promotes potentially disruptive construction and operational methods to achieve its aims. According to the Final EIS/EIR, Metro plans to place easements on portions of District property at Huntington Park High School and San Antonio Elementary School. The District is concerned about the potential negative impacts of the project on our students, teachers, and staff. Based on the extent and location of the proposed development, it is our opinion that environmental impacts on the surrounding area may occur. Since the project would have an environmental impact on District school sites, recommended measures designed to help reduce or eliminate potential impacts are included in this response.

Work with LA Unified

Project proponents must coordinate any construction activities with LA Unified to ensure safety of students and their families and minimize disruptions to school activities and access to campus. Effective strategies of avoiding significant impacts on school operations include:

- Completing construction activities such as demolition and excavation when the schools are not in session (summer and winter breaks, holidays, weekends, and after hours).
- Including school and District representatives to review construction management plans, construction outreach plans, and participation in weekly construction meetings.
- Avoiding concurrent construction activities occurring in more than one project site.
- Obtaining prior authorization from the District for any easements and project activities on or surrounding District properties.
- Working with the District in identifying appropriate construction mitigation programs.

Hazards and Hazardous Materials

The Project has the potential to transport hazards and hazardous materials during construction and operation. There is a potential for the release of harmful substances since the Project affects an existing freight railroad and adjoins multiple listed hazardous sites. Of particular concern is the Project's activities on or around three Superfund NPL Sites (Jervis Webb, Southern Avenue Industrial Area, and Cooper Drum Co.) that are adjacent to Tweedy Learning Center that have the potential to affect students and staff of that site. The following language is recommended for potential impacts related to hazards and hazardous materials.

- During construction, ingress/egress routes to the construction site should be designed to ensure that trucks and construction vehicles carrying hazards and hazardous materials are routed away from District school sites. Additional recommendations are provided in this letter under the Transportation/Traffic section.

Air Quality

District students and school staff should be considered sensitive receptors to air pollution impacts. To ensure that effective measures are applied to further reduce construction air pollutant impacts, we ask that the Lead Agency incorporate into the project's conditions or mitigation measures the following language:

- Implement all applicable provisions of Rule 403 for fugitive dust control during construction of the Project.
- Implement all applicable provisions of Rule 1466 (e)(15) restrictions on soil moving.
- Utilize low emission “clean diesel” equipment with new or modified engines manufactured to meet Tier 4 specifications or retrofitted to comply with CARB’s verified diesel emission control strategy (VDECS).

- Construction vehicles shall not idle in excess of five minutes.
- Ensure that construction equipment is properly tuned and maintained in accordance with manufacturer's specifications.
- Water/mist soil as it is being excavated and loaded onto the transportation trucks.
- Water/mist and/or apply surfactants to soil placed in transportation trucks prior to exiting the site.
- Minimize soil drop height into transportation trucks or stockpiles during dumping.
- Cover the bottom of the excavated area with polyethylene sheeting when work is not being performed.
- Place stockpiled soil on polyethylene sheeting and cover with similar material.
- Place stockpiled soil in areas shielded from prevailing winds.
- Sweep streets at the end of the day if visible soil material is carried onto adjacent public paved roads (recommend water sweepers).
- Install wheel washers (or steel shaker plates) where vehicles enter and exit unpaved roads onto paved roads or wash off trucks and any equipment leaving the site each trip.
- Suspend all excavating and grading operations when wind speeds (as instantaneous gusts) exceed 25 miles per hour (mph).
- Excavation and transportation of soil known to contain hazardous substances should be limited to periods when school is not in session.

Noise and Vibration

Noise and vibration created by construction and operation activities may impact District schools that are adjacent to the Project corridor. CEQA requires that such impacts be quantified and eliminated or reduced to a level of insignificance. LAUSD established maximum allowable noise levels to protect students and staff from noise impacts generated in terms of Leq. These standards were established based on the California High Performance Schools (CHPS) noise standard. LAUSD's exterior noise standard is 67 dBA Leq and the interior noise standard is 45 dBA Leq. A noise level increase of 3 dBA or more over ambient noise levels is considered significant for existing schools and would require mitigation to achieve levels within 2 dBA of pre-Project ambient level.

In addition, to ensure that effective measures are employed to reduce construction and operation related noise impacts on District sites, LAUSD asks that the following language be included in the control measures for noise impacts:

- A temporary noise barrier capable of reducing construction noise levels on all campuses located along the proposed rail ROW and Randolph Street to 67 dBA L_{eq} shall be installed between the rail corridor and the schools.
- Provisions shall be made to allow school administrators and/or their designated representative(s) to notify the contractor if construction noise levels are adversely impacting the learning environment. In this event, the contractor must implement additional noise attenuation measures or reschedule noise-generating activities to a time when school is not in session.

Pedestrian Safety and Traffic

Several schools front Randolph Street, where many of the planned street closures and new access restrictions will be introduced by the Project. Table 4.2.4. Project Effects on Community Character and Cohesion of the Final EIS/EIR identifies significant disruptions to existing access to schools as a result of Project activities. OEHS is concerned by the comprehensive changes in existing pedestrian, bicycle, truck, and vehicular circulation to access school sites which include vehicle-turning restrictions on Randolph St at Santa Fe Ave, Pacific Blvd, Miles Ave, and State St; truck turning restrictions on Randolph St at Pacific Blvd, Seville Ave, and Miles Ave, and on Salt Lake Ave at Otis Ave and Santa Ana St; Street closures/modifications at the Wilmington Ave, Regent St, Malabar St, Rita Ave, and Arbutus Ave grade

crossings; re-routing of existing pedestrian/residents routes across rail ROW to San Antonio Continuation School, San Antonio Elementary School, and Huntington Park High School; and re-routing traffic to adjacent streets as a consequence of the Project.

Construction activities will also lead to the presence of heavy equipment and increased truck trips to haul materials on and off the project site, which can lead to safety hazards for people walking or driving in the vicinity of the construction site. In addition, construction activities also may lead to increased traffic volumes or traffic disruptions in an already congested area during school drop off and pickup times. To ensure that impacts on nearby schools from the construction of the proposed Project are reduced to the extent feasible, OEHS asks that the following mitigation measures be required:

- Contractors must maintain ongoing communication with Los Angeles Unified school administrators, providing sufficient notice to forewarn children and parents when existing pedestrian routes to schools may be impacted.
- Contractors must maintain safe and convenient pedestrian routes to Los Angeles Unified schools.
- Contractors must install and maintain appropriate traffic controls (signs and signals) to ensure pedestrian and vehicular safety.
- Haul routes are not to pass by any school, except when school is not in session.
- No staging or parking of construction-related vehicles, including worker-transport vehicles, will occur on or adjacent to a school property.
- Funding for crossing guards and flaggers at the project proponent's expense is required any time the safety of children may be compromised by construction-related activities at impacted school crossings.
- Barriers and/or fencing shall be installed to secure construction equipment and to minimize trespassing, vandalism, short-cut attractions, and attractive nuisances.
- Contractors are required to provide security patrols (at their expense) to minimize trespassing, vandalism, and short-cut attractions.
- LA Unified's Transportation Branch **must be contacted** at (213) 580-2900 regarding the project's potential effect upon existing school bus routes.
- The Project Manager or designee shall notify the LA Unified Transportation Branch of the expected start and ending dates for various portions of the proposed project that may affect traffic within the nearby school areas.
- School buses must have unrestricted access to LA Unified District schools.
- During the construction phase, truck traffic and construction vehicles may not cause traffic delays for our transported students.
- During and after construction, changed traffic patterns, lane adjustment, traffic light patterns, and altered bus stops may not affect school buses' on-time performance and passenger safety.
- Construction trucks and other vehicles are required to stop when encountering school buses using red-flashing-lights must-stop-indicators per the California Vehicle Code.
- Contractors must install and maintain appropriate traffic controls (signs and signals) to ensure vehicular safety.

- Contractors must maintain ongoing communication with LA Unified school administrators, providing sufficient notice to forewarn children and parents when existing vehicle routes to school may be impacted.
- Parents dropping off their children must have access to the passenger loading areas.

The District's charge is to protect the health and safety of students, staff, and the integrity of the learning environment. The comments presented above identify potential environmental impacts related to the proposed project that must be addressed and should be incorporated as conditions of project approval or similar regulatory mechanism adopted by the Lead Agencies to ensure the welfare of residents, students attending schools, their teachers and staff, as well as to inform parents/guardians of these students.

Thank you for your attention to this matter. If you need additional information, please contact me at (213) 241-4210 or at ceqa-comments@lausd.net.

Sincerely,

Bryan Ramos Fernandez
Bryan Ramos Fernandez, AICP
CEQA Project Manager
Los Angeles Unified School District (LAUSD)
Office of Environmental Health and Safety (OEHS)
333 S Beaudry Ave., 21st Floor, Los Angeles, CA 90017



THE CITY OF ARTESIA, CALIFORNIA

18747 CLARKDALE AVENUE, ARTESIA, CALIFORNIA 90701

Telephone 562 / 865-6262

FAX 562 / 865-6240

"Service Builds Tomorrow's Progress"

April 29, 2024

Los Angeles County Metropolitan Transportation Authority
Attn: Meghna Khanna, Deputy Executive Officer
Countywide Planning & Development
One Gateway Plaza
Los Angeles, CA 90012-2952

RE: Public Comments by the City of Artesia Regarding the Los Angeles County Metropolitan Transportation Authority's ("Metro) Final Environmental Impact Study/Report Released for the West Santa Ana Branch Transit Corridor Project (now Southeast Gateway Line)

Dear Ms. Khanna:

The City of Artesia (the City) is submitting the attached public comments for the Final Environmental Impact Study/Report for the West Santa Ana Branch Transit Corridor Project (now Southeast Gateway Line).

Please contact me at planning@cityofartesia.us should you have any questions.

Sincerely,

Peter Kann
Planning Manager

Attachment:
Public Comments

City of Artesia Public Comments
FEIS/FEIR

No	Reviewer	Chapter	Page	Comment
1	KL	1	10	Change green dot 20 from "Little India" to International Cultural District of Artesia
2	KL	Executive Summary	12	187th St needs to stay open. Major east west corridor for the City; only 187th St has a traffic signal where it ends at Gridley Ave. and it empties directly into the Los Cerritos Shopping Center parking lot; 186th St /Gridley Ave has no traffic signal and is right turn only intersection.
3	KL	3	40	Does not acknowledge residential permit parking district in Artesia around the station. Says that there are 920 on-street parking spaces with only 270 space occupied. Does Metro intend the street parking to be spillover for the parking garage? On street parking during daylight hours reserved for Downtown district and residential permit district.
4	RI	Executive Summary	8	Traffic Operations: Which 12 intersections will have adverse impacts even after mitigation? Can this refer to a list?
5	RI	Executive Summary	8	Active Transportation: What about Artesia Bike Lane? There is modifications to the existing bike lane at 186th & 187th Street. Will the bike trail continue to be a direct path to Pioneer Station?
6	RI	Executive Summary	20	Noise and Vibration: Where are the severe impacts located?
7	RI	2	32	The City requests for 187th Street to remain open: 1) It acts an arterial between the east and west side of the City. 2) The west ends at Gridley has traffic signal unlike 186th is right turn only. 3) It directly connects to Cerritos Mall. 4) Closure of 187th will separate the historic fire station and Artesia Historic Museum. This is the preferred option.
8	RI	3	2	Why wasn't Pioneer Blvd and South Street intersection included for analysis? This intersection is highly congested and with the increase in volume from the 605 to the parking station, and Caltrans expansion of the 605 on and off ramp on South Street, this will increase volume at Gridley/South and then Pioneer/South.
9	RI	3	40	Is the excess street parking intended for spillover use?
10	RI	3	65	4th paragraph: Will the modifications to the grade crossings at 186th and 187th result in a continued direct path to Pioneer Station?

City of Artesia Public Comments
FEIS/FEIR

No	Reviewer	Chapter	Page	Comment
11	PK	2	32	Any street vacation will require approval by the City Council. Metro will be required to provide a street vacation package that will be presented to the City Council for its decision.
12	TW	Executive Summary S.2 and S.3	Pioneer Station Page 2-40	The City requests for 187th Street to remain open: 1) It acts an arterial between the east and west side of the City. 2) The west ends at Gridley has traffic signal unlike 186th is right turn only. 3) It directly connects to Cerritos Mall. 4) Closure of 187th will separate the historic fire station and Artesia Historic Museum. This is the preferred option. The City requested in the Draft EIS/R that Metro perform a traffic circulation pattern and circulation analysis due to the major changes in citywide traffic patterns that closure of either 186th or 187th will cause. Additionally, a Wayfinding Sign Analysis is needed as part of mitigation measures. Metro staff did acknowledge that this can be performed during the design stage.
13	TW	Executive Summary S.2; S.2.3; S.3	Pioneer Station Page 2-40	A bicycle and pedestrian linkage circulation and path analysis between the commercial center and the adjacent residential analysis needs to be performed as part of mitigation measures.
14	TW	Transportation3.4.1	Traffic Operation Page 3-44	The Circulation Analysis needs to be included in this section or add a subsection under heading Artesia Circulation Analysis. This comment is a follow-up to the comment the City made for the Draft EIS/R. See Appendix D_Responses to Comments Received on the Draft EIS-EIR Part 1; Page CC-4; CC-3-11.
15	TW	Public Outreach and Agency Consultation 7.8.2	Agency Corridor Outreach 7-16	Land Use on the parking structure will require zone change and/or general plan update. This comment is a follow-up to the comment the City made for the Draft EIS/R. See Appendix D_Responses to Comments Received on the Draft EIS-EIR Part 1; Page CC-4; CC-3-11.
16	KL	Public Outreach and Agency Consultation 7.8.2	Agency Corridor Outreach 7-16	During meetings with Metro, the City stated that it wants to have ground floor retail at the parking structure due to the parking garage reducing the amount of eligible land for retail development. See Appendix D_Responses to Comments Received on the Draft EIS-EIR Part 1; Page CC-4; CC-3-11.

The City of Bellflower
Families. Businesses. Future.

16600 Civic Center Drive, Bellflower, CA 90706

Tel 562.804.1424 Fax 562.925.8660 www.bellflower.org



April 25, 2024

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

RE: Comments on the Southeast Gateway Line Final EIS/EIR

Dear Ms. Khanna,

The City of Bellflower ("City") has reviewed the Final Environmental Impact Statement/Environmental Impact Report ("EIS/EIR") and respectfully submits the attached comments on the Final EIS/EIR.

As you are aware, the City Council adopted Resolution No. 18-67, expressing its view that Metro's proposed Maintenance Facility ("MSF") at 9030 Somerset Blvd. (APN 6271-001-90 & 6271-001-901) could be beneficial to the community under very specific conditions as follows:

- 1) The Light Rail Maintenance Facility will be developed as an aesthetically pleasing, state of the art yard that meets all current noise, air quality, and traffic mitigation measures and coexists harmoniously with the surrounding business and residential communities;
- 2) The MTA will develop a valid "Bellflower First" hiring policy when staffing the facility;
- 3) The purchase price paid for the property will be based on the fair market and will be sufficient to offset the cost of establishing adequate supplemental and/or replacement open space opportunities within the City of Bellflower;
- 4) The establishment of a rail maintenance facility at the Lakewood/Somerset site will satisfy completely the MTA's "3% Local Match" in funding from each City along the light rail construction route;
- 5) The MTA will set aside and develop a location of not less than 1.5 acres of active "open space" within or adjacent to the proposed light rail maintenance facility site to serve the residential community living on Somerset Boulevard and the Bellflower Community as a whole in a manner to be approved by the Bellflower City Council; and

Southeast Gateway Line Final EIS/EIR Comments – City of Bellflower

April 25, 2024

Page 2 of 2

6) Upon development of the facility, MTA will be solely responsible for compensation and relocation, if necessary, of the long-term leaseholder currently operating a paintball facility at the Lakewood/Somerset Site.

Based on discussions with Metro, the City is under the premise that Metro understood and preliminary agreed to the conditions outlined in the Resolution. If Metro's position has changed, then the City Council's understanding and support for selling City Property do not appear to be met and the City's support for the sale and use of the property necessary for the maintenance facility is rescinded.

As you are also aware, the City has begun the process of rezoning and amending the General Plan to allow a mix of uses, such as high-density residential and open space, at the Bellflower MSF site. All cities in California are under significant pressure to plan for and build affordable housing. This has been routinely identified as a priority for our residents, even above the need for safe and reliable transit options. If Metro's intent is inconsistent with the conditions established by the City Council in Resolution No. 18-67, the City believes it has a duty to consider the site for the possibility of other more beneficial uses. Attached is the Notice of Preparation ("NOP") for a Program Environmental Impact Report related to General Plan Amendment No. 24-01 and Zone Change No. 24-01 for property located at 9030 Somerset Boulevard (the MSF site). A hardcopy has been sent via certified mail to you.

As reflected in the attached comments, Metro should consider revising the EIS/EIR to consider impacts and project consistency with the proposed General Plan Amendment and Zone Change of the MSF site.

We appreciate the opportunity to comment on the Final EIS/EIR. If you have any questions, please feel free to contact me.

Sincerely,



Ryan Smoot
City Manager

Enclosures

City of Bellflower - Comments on Final EIS/EIR

Comment ID	City Response on Final EIS/EIR
CC-6-4	<p>The City continues to believe that Metro overstates the available on-street parking with the 0.25 mile radius of the Bellflower station. The updated field survey summarized in Section 4.5.1.4 of the West Santa Ana Branch Transit Corridor Project Final Transportation Impact Analysis Report that corresponds to the final EIS/EIR continues to be inaccurate. As an example, Table 4-49. On-Street Parking Supply and Utilization – Cities of Paramount & Bellflower (Page 4-68) states the available on-street capacity of Ardmore Avenue between Olive Street and Mayne Street has 7 available spaces for the northbound travel direction and 10 available spaces for the southbound travel direction. The actual available space for northbound is relatively accurate at 7 spaces, however the available space along the southbound travel lane is 7 spaces (using Metro’s 25 ft. measurement guide). This sample segment of Metro’s report inaccurately inflates the available on-street parking capacity by 3 total spaces available on this small 200-foot segment of roadway. The City contends that this is not the only inaccuracy in the revised report.</p> <p>Additionally, the recent passage and implementation of Assembly Bill 413 further reduces on-street parking capacity by 2 vehicles per neighborhood block by restricting vehicle parking within 20 feet of any marked or unmarked crosswalk. While Metro could not account for this at the time of their survey, this is now State law and as a result, the on-street vehicle parking capacity has been further reduced in all communities.</p> <p>Finally, in the first round of comments submitted by the City related to this matter, after the City discovered Metro’s first visual survey was done during street sweeping hours where vehicles were prohibited from parking on streets, it was specifically requested that a revised study be conducted during the hours of 6:00 AM to 8:30 AM as well as 4:00 PM to 6:30 PM on a day when the street is not scheduled for street sweeping activities. Metro’s revised visual survey disregarding the City’s request as evidenced by their comments which state that the revised survey was done between the hours of 6:30 AM to 8:30 AM and again between 11:00 AM and 2:00 PM on Tuesdays, Wednesdays and Thursdays. The revised survey intentionally avoided a critical afternoon peak usage time for on-street parking (4:00 PM – 6:30 PM) and street sweeping activities occurred within the timeframes and days stated in their revised report.</p>

The City continues to believe that Metro has not conducted their revised on-street parking capacity survey accurately and that the findings overstate the existing on-street vehicle parking capacity and understate the occupied vehicles count. The EIR/EIS should be revised to address the concerns and inaccuracies noted above.

CC-6-32 The EIS/EIR acknowledges after implementation of both project measures and mitigation measures, operation of the LPA will result in 8 moderate impacts and 1 severe impact in the City of Bellflower. A severe impact remains and the City continues to request additional mitigation measures to address the impact.

CC-6-33 NOI-1: The City requests to be included in the review of the final design for the soundwalls.
NOI-4, NOI-5: Project measures NOI PM-1 and NOI PM-2 remain subject to CPUC approval. If CPUC does not approve these measures, the City asks Metro to identify what additional mitigation measures will be incorporated.

CC-6-34 The EIS/EIR acknowledges that construction noise at the Bellflower MSF are significant and unavoidable, which will be severely impactful to the residential community adjacent to the site. The City requests additional mitigation measures be included, to be notified and included in construction scheduling, and to be provided with a list of equipment that will be used. As part of the City's conditional support to consent to the sale and repurposing of the MSF site per Resolution No. 18-67, it required the following condition be met: "the Light Rail Maintenance facility will be developed as an aesthetically pleasing, state of the art yard that meets all current noise, air quality, and traffic mitigation measures and coexists harmoniously with the surrounding business and residential communities." Based on the EIS/EIR acknowledging that construction noise is significant and unavoidable, it does not appear that the City condition has been met.

CC-6-32 to CC-6-36 The responses to City comments related to Noise and Air Quality were flawed in that references to Tables were made to the Draft EIR/EIS. Unfortunately, since the Final document replaces the Draft document, a link to the Draft EIR/EIS can no longer be found on the Metro and project website. Therefore, the City was not able to review the referenced Tables or determine if the responses actually addressed the City's specific comments on Noise and Air Quality. Accordingly, the City requests that the responses be revised to reference information, discussions, and supportive Tables and Exhibits from the Final rather than Draft EIR/EIS.

CC-6-28 The City requests to review the proposed designs and locations for the proposed bio-swale/flood control measures.

CC-6-55 & New Comment The EIS/EIR analyzed the project for consistency with the City's General Plan, land use, and zoning goals and policies. The City is currently in the process of rezoning and amending the General Plan for the MSF site to allow for mixed uses, which include high-density residential and Open Space. Metro should consider revising the EIR/EIS to ensure project consistency with the intended land use and zoning changes.

CC-6-57 As part of the City's conditional support to consent to the sale and repurposing of the MSF site per Resolution No. 18-67, one of the conditions was that "the MTA set aside and develop a location of not less than 1.5 acres of active "open space" within or adjacent to the proposed light rail maintenance facility site to service the residential community living on Somerset Boulevard and the Bellflower Community as a whole in a manner to be approved by the Bellflower City Council." The EIR/EIS should address this and include the 1.5 acres of active open space as part of the MSF design plans.

CC-6-60, CC-6-61 The response indicates that the retaining walls, at their tallest point, will be approximately 25 feet in height. The response also compares these walls to surrounding buildings in the area. A 25-foot tall retaining wall is still significant as it relates to mass and scale. Comparing a retaining wall to a building is an inadequate comparison as building walls have articulation, wall plane changes, windows, decorative elements such as awnings, etc. The City requests to be included in the design of the wall to be able to provide input on the measures taken to enhance the aesthetics.

CC-6-62 The City requests to be included in the design of the MSF site to ensure adequate landscaping and shielding methods will be provided to mitigate any impacts to the adjacent residential properties.

CITY OF BELLFLOWER

RESOLUTION NO. 18-67

A RESOLUTION REPEALING CITY OF BELLFLOWER RESOLUTION NO. 17-33, ADOPTED JUNE 25, 2017, AND RESTATING THE CITY'S POSITION TO SUPPORT, WITH CONDITIONS, THE POTENTIAL USE OF A 23-ACRE PARCEL (LAKEWOOD/SOMERSET SITE) LOCATED EAST OF LAKEWOOD BOULEVARD AND SOUTH OF SOMERSET BOULEVARD AS A POTENTIALLY APPROPRIATE LOCATION FOR THE PLACEMENT OF A LOS ANGELES METROPOLITAN TRANSPORTATION AUTHORITY (MTA) LIGHT RAIL MAINTENANCE FACILITY

THE CITY COUNCIL RESOLVES AS FOLLOWS:

SECTION 1. The City Council finds as follows:

- A. The City of Bellflower repeals Resolution No. 17-33 stating the City Council's opposition to placing an Metropolitan Transportation Authority (MTA) light rail maintenance facility at the Lakewood/Somerset site for the purposes of providing support and repair services for the proposed West Santa Ana Branch Extension light rail project.
- B. Subsequent to the adoption of Resolution No. 17-33, the City Council and staff committed to significant additional study regarding the placement of a rail maintenance facility in Bellflower, including specific analysis of the the actual impact to the community of utilizing the Lakewood/Somerset site for such a use, visiting similar facilities in Los Angeles County and the studying the social and monetary costs of providing additional programmed and un-programmed open space development at the Lakewood/Somerset Sight, as well as analyzing the potential enhancement of open space activities at other existing open space facilities in Bellflower, and determined that utilizing the Bellflower/Somerset site as a light rail maintenance facility could, with conditions, impact the community in a beneficial manner.
- C. After considering the additional information, the City Council finds that it could consent to the sale and repurposing of the Lakewood/Somerset site if the following minimum conditions are met: 1) the Light Rail Maintenance Facility will be developed as an aesthetically pleasing, state of the art yard that meets all current noise, air quality, and traffic mitigation measures and coexists harmoniously with the surrounding business and residential communities; 2) the MTA will develop a valid "Bellflower First" hiring policy when staffing the facility; 3) the purchase price paid for the the property will be based on the fair market and will be sufficient to offset the cost of establishing adequate supplemental and/or replacement open space opportunities within the City of Bellflower; 4) the establishment of a rail

maintenance facility at the Lakewood/Somerset site will satisfy completely the MTA's "3% Local Match" in funding from each City along the light rail construction route; 5) the MTA will set aside and develop a location of not less than 1.5 acres of active "open space" within or adjacent to the proposed light rail maintenance facility site to serve the residential community living on Somerset Boulevard and the Bellflower Community as a whole in a manner to be approved by the Bellflower City Council; 6) upon development of the facility, MTA will be solely responsible for compensation and relocation, if necessary, of the long-term leaseholder currently operating a paintball facility at the Lakewood/Somerset Site.

- D. The City of Bellflower requests that the Board of Directors, and its officers, at Eco-Rapid Transit and, potentially, the Board of Directors at MTA consider this item as a formal reconsideration and change in policy from that stated in City of Bellflower Resolution No. 17-33.
- E. The City Manager and his designees are authorized to take whatever actions are deemed necessary to communicate the policy stated within this Resolution with regard to the potential establishment of a Light Rail Maintenance Facility at the Lakewood/Somerset Site.

SECTION 2. This Resolution does not affect any penalty, forfeiture, or liability incurred before, or preclude prosecution and imposition of penalties for any violation occurring before this Resolution's effective date. Any such amended part will remain in full force and effect for sustaining action or prosecuting violations occurring before the effective date of this Resolution.

SECTION 3. If any part of this Resolution or its application is deemed invalid by a court of competent jurisdiction, the City Council intends that such invalidity will not affect the effectiveness of the remaining provisions or applications and, to this end, the provisions are severable.

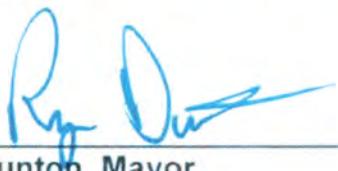
SECTION 4. To the extent that any other resolution pertaining to the opposition of the efforts of Eco-Rapid Transit and the MTA to study, recommend and potentially site a light rail transit maintenance facility on the Lakewood/Somerset site is incorporated into this Resolution and is superseded in its entirety.

SECTION 5. The Mayor, or presiding officer, is hereby authorized to affix his signature to this Resolution signifying its adoption by the City Council of the City of Bellflower, and the City Clerk, or her duly appointed deputy is directed to attest thereto.

City of Bellflower
Resolution No. 18-67
Page 3 of 3

SECTION 6. This Resolution will become effective immediately upon adoption.

PASSED, APPROVED AND ADOPTED BY THE CITY COUNCIL OF THE CITY OF BELLFLOWER THIS 22ND DAY OF OCTOBER 2018.



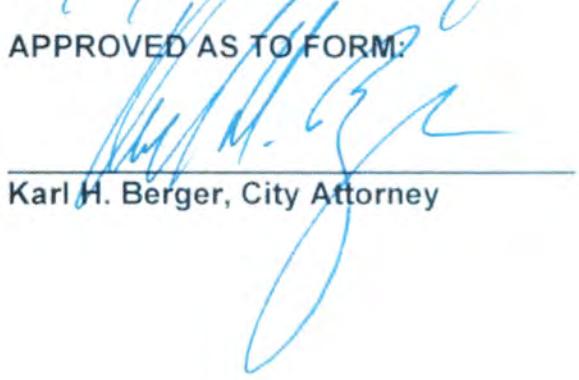
Ray Dunton, Mayor

ATTEST:



Mayra Ochiqui, City Clerk

APPROVED AS TO FORM:



Karl H. Berger, City Attorney

STATE OF CALIFORNIA)
COUNTY OF LOS ANGELES)SS
CITY OF BELLFLOWER)

I, **Mayra Ochiqui**, City Clerk of the City of Bellflower, California, do hereby certify under penalty of perjury that the foregoing Resolution No. 18-67 was duly passed, approved, and adopted by the City Council of the City of Bellflower at its Regular Meeting of October 22, 2018, by the following vote to wit:

AYES: Council Members – Garza, Koops, Santa Ines, and Mayor Dunton
ABSENT: Council Members – Schnablegger

Dated: October 23, 2018

Mayra Ochiqui
Mayra Ochiqui, City Clerk
City of Bellflower, California

(SEAL)

**NOTICE OF PREPARATION FOR
PROGRAM ENVIRONMENTAL IMPACT REPORT
FOR HOLLYWOOD SPORTS PARK PROPOSAL
(GENERAL PLAN AMENDMENT NO. 24-01 AND ZONE CHANGE NO. 24-01)
CITY OF BELLFLOWER**

General Information

To: Interested Agencies, Organizations, and Parties

Project Title: Hollywood Sports Park Proposal (General Plan Amendment No. 24-01 and Zone Change No. 24-01)

Review Period: April 26, 2024 to July 25, 2024

Lead Agency: City of Bellflower
Planning Department
16600 Civic Center Drive
Bellflower, CA 90706
Contact: Elizabeth Oba, Director of Planning and Building Services; (562) 804-1424 ext. 2276; eoba@bellflower.org

Purpose of Notice: In accordance with provisions of the California Environmental Quality Act (CEQA), the City of Bellflower is circulating a Notice of Preparation (NOP) to acquire input on the scope and contents of the Program Environmental Impact Report (Program EIR) to assess the future development of mixed-uses (high-density residential and open space uses) within City owned property currently being utilized by Hollywood Sports Park. This NOP describes the required Planning applications for future mixed-use development, general background information on the scoping process, the environmental issues to be addressed in the Program EIR, and the anticipated uses of the Program EIR. This NOP is intended to satisfy the requirements of CEQA (Public Resources Code Sections 21000–21177), and the CEQA Guidelines (14 California Code of Regulations Sections 15000–15387). Furthermore, a Program EIR is being prepared in accordance with CEQA Guidelines Section 15168, since a specific project design is not being considered at this time. This Program EIR therefore, focuses on the required Planning applications (GPA No. 24-01 and ZC No. 24-01) for future mixed-use development.

Project Location: The Project Site consists of the existing 22.0-acre Hollywood Sports Park site which is located at 9030 Somerset Boulevard (Assessor's Parcel Numbers 6271-001-900 & 6271-001-901) ("Project Site"). The Project Site is located in southern Los Angeles County in the City of Bellflower. Project boundaries include Somerset Boulevard to the north, the Los Angeles County Metropolitan Transportation Authority ("MTA") right-of-way to the south; and Lakewood Boulevard further to the west (see attached aerial photograph). Regional access is provided by four freeways all within three miles of the project site (Interstate 710, 605, and 105; and State Route 91).

Notice of Preparation for Program EIR



Existing Onsite and

Surrounding Uses:

The Project Site is currently utilized for recreational activities and events that include outdoor paintball, airsoft, soft-pellet tag, and gelburst, set within movie remnants, rock walls, and other settings.

Surrounding uses include strip commercial along Somerset Boulevard to the north, residential uses and a school that are located further beyond these commercial uses to the north. Single-family residential neighborhoods are located to the south and east. To the west is a mixture of industrial and commercial uses, and a mobile home park.

Project Description

Background:

The Project Site previously operated as the Bellflower Golf and Tennis Center, which included a 9-hole executive golf course, driving range, clubhouse, and tennis courts. In March 2000, the City approved applications that allowed for a multi-purpose building, paintball fields, go-kart/BMX bike tracks, skateboard arenas, rock climbing, beach volleyball, bike paths, and alcohol sales at the site. Since 2000, the City has approved numerous Conditional Use Permits and other permits to allow for game arcade activities, alcohol sales, dance and entertainment activities, and other commercial and recreational activities and events. As discussed, the Project Site is currently utilized for recreational activities and events that include outdoor paintball, airsoft, soft-pellet tag, and gelburst, set within movie remnants, rock walls, and other settings.

Project Description:

The proposed project includes revising the Land Use Plan in the Land Use Element and amending the Certified 2021-2029 Housing Element (GPA No. 24-01), and a Zone Change (ZC No. 24-01) to allow for future mixed-uses (high-density residential and open space uses) on the Project Site. At this writing, actual mixed-use development and design plans are not being reviewed or considered by the City. Therefore, this Program EIR will evaluate, on a programmatic-level, potential environmental impacts resulting with the proposed GPA and ZC. To quantify potential impacts to the greatest extent possible, a development scenario has been created based on a maximum development density and permitted uses as established by the proposed GPA and ZC.

The Project Site is currently designated Open Space by the City's Land Use Plan in the General Plan's Land Use Element and O-S Open Space by the City's Zoning Map in the Bellflower Municipal Code ("BMC"). The Land Use Element defines Open Space as "public or privately owned properties to be retained for open space purposes including public parks, utility easements, and transportation corridors." The BMC defines O-S Open Space as areas that preserve and manage natural resources, enhance public health and safety, include outdoor recreation, care for horses, and allow for wireless communication facilities.

The proposed GPA and ZC will re-designate the Project Site to "Mixed-Use" and "Specific Plan" in the General Plan's Land Use Element and BMC, respectively. The Land Use Element defines the Mixed-Use category "...to accommodate innovation in land use planning, both in existing commercial and multi-family residential areas...The Mixed-Use land use category is created to enable the addition of residential uses on commercial property or commercial uses on residentially used lots. Mixed-use does not mean that commercial and residential uses are next to each other (although that may be the case)

but rather that the uses exist together on the same lot.” The Certified 2021-2029 Housing Element will be amended to identify the Project Site as an underutilized residential site that could be developed as higher density residential and will include the Project Site as a new Housing Opportunity Area. The Housing Element, as currently certified, can achieve and satisfy the City’s Regional Housing Needs Allocation (RHNA) obligation. With the proposed GPA and ZC, the Project Site will be able to accommodate approximately 1,640 housing units which would serve as additional buffer to the City’s RHNA obligation. This Proposal facilitates development of additional housing in the City in accordance with policies and objectives in the Housing Element.

The BMC allows for Specific Plans because “[t]he City recognizes that certain parcels in Bellflower may benefit from focused planning efforts whereby infrastructure, land use relationships, land use intensities, and public service needs can be carefully examined and planned in a comprehensive manner. The Specific Plan provides a mechanism to carry out such planning efforts. The purpose...is to establish uniform procedures and guidelines for Specific Plans prepared pursuant to Government Code Section 65450, et seq.”

**Potential
Mixed-Use
Development:**

As discussed, actual mixed-use development and design plans are not being reviewed or considered by the City at this time. Therefore, to quantify potential impacts to the greatest extent possible, a development scenario has been formulated based on a maximum development density and those permitted uses as established by the proposed GPA and ZC. The proposed GPA No. 24-01 will allow mixed-uses at the Project Site. The allowed mixed-uses could include both high-density residential uses and open space uses. For purposes of analysis, it is anticipated that 20.5 acres of the 22.0-acre Project Site could be utilized for high-density residential uses (100 dwelling units/acre maximum); while the remaining 1.5 acres could be utilized for open space uses. Based on this 100 du/acre maximum density, the 20.5-acre portion of the Project Site could allow for a gross of 2,050 residential units. However, given that parking, landscaping, common areas, internal streets, and other infrastructure would reduce developable residential area, it is assumed that there will be a 20 percent reduction of the 2,050 dwelling units. Therefore, for purposes of analysis, it is estimated that 1,640 dwelling units could be developed at the Project Site. Regarding open space uses, it is anticipated that outdoor active open space and recreational activities would be allowed.

The Program EIR will therefore, evaluate on a programmatic-level, potential environmental impacts resulting from the proposed GPA and ZC and this particular development scenario. The City will review and approve future Specific Plans that will provide development and design standards and allow for mixed-uses. Additional environmental and CEQA analysis will be required as appropriate.

Project Objectives

Consistent with CEQA Guidelines Section 15124(b), a clear statement of objectives and the underlying purpose of the project will be discussed in the Program EIR. The underlying purpose of the project is to allow for future high-density residential and open space uses at the Project Site. Approval of proposed GPA No. 24-01 and ZC No. 24-01 will redesignate and rezone the Project Site from Open Space to Mixed-Use and Specific Plan, respectively, so as to allow for these future mixed-uses. The following objectives will also be realized with the proposed project:

- ▶ Allow for a range of housing types in order to address the City's share of RHNA.
- ▶ Allow for the highest and best mixed-uses for the Project Site.
- ▶ Allow for development of high-density residential and open space uses at the Project Site.
- ▶ Facilitate construction of future residential uses in accordance with the policies of the State.
- ▶ Facilitate development of high-quality mixed-uses in the City.
- ▶ Develop the Project Site with mixed-uses that blend-in with neighboring mixed-uses.
- ▶ Continue to provide open space and recreational uses that benefit the neighboring areas and the City.
- ▶ Assist the City with meeting its economic development and planning goals, as set forth in its General Plan which encourages mixed-uses.
- ▶ Provide employment opportunities for residents of Bellflower and surrounding areas.
- ▶ Construct mixed-uses with proximal access to existing and future utility infrastructure and roadways.

Potential Environmental Impacts

Pursuant to CEQA Guidelines Section 15064, the discussion of effects on the environment in the Program EIR are focused on those impacts that the City has determined may be potentially significant. The Program EIR also will evaluate the cumulative impacts of the project when considered in conjunction with other related past, present, and reasonably foreseeable future projects. Although, at this very early stage of the environmental review process, it is difficult to ascertain with certainty the precise nature and extent of the environmental effects, it is possible to identify the following potential environmental effects that the proposed project could generate. The City has determined that the Program EIR will evaluate the following environmental impacts:

- ▶ **Aesthetics:** The Program EIR will describe how the project would change the view of the site from public viewpoints near the Project Site. The Program EIR will also describe any light- and glare-related impacts, focusing on sensitive viewsheds, changes to the visual character of the Project Site, and changes to light and glare associated with the project. Mitigation measures will be recommended to reduce or eliminate any significant project impacts, as necessary.
- ▶ **Air Quality/Greenhouse Gas Emissions:** This project is located within South Coast Air Quality Management District (SCAQMD) jurisdiction. During construction and operation, the project could emit criteria air pollutants, primarily through vehicular operation. The Program EIR will assess the project's construction- and operation-related emissions of criteria air pollutants and precursors (e.g., reactive organic gasses [ROG], nitrogen oxides [NO_x], sulfur dioxide [SO₂], carbon monoxide [CO], respirable particulate matter [PM₁₀], and fine particulate matter [PM_{2.5}]). The Program EIR will then compare these estimates to the significant health-based emissions thresholds specified in SCAQMD's CEQA Guidelines. The Program EIR will also evaluate the potential for substantial concentrations of toxic air contaminants and odors perceived by nearby land uses and other sensitive receptors as a result of project implementation. Greenhouse gas (GHG) emissions, particularly from any additional truck trips, will be assessed in the Program EIR. The Program EIR will recommend mitigation measures, if necessary.
- ▶ **Biological Resources:** The Program EIR will include a description of the special-status plant and wildlife species known to occur within the Project Site, and a determination of whether suitable habitat exists onsite to support any special-status species. The chapter will be based on a survey of the Project Site and any off-site infrastructure alignments. Mitigation measures to reduce impacts to sensitive resources will be developed and recommended as necessary.
- ▶ **Cultural Resources/Tribal Cultural Resources:** The Program EIR will evaluate potential effects to archaeological resources from implementation of the project, focusing on any unique archaeological resources, historical resources, or tribal cultural resources. A records search will be conducted to identify any

documented historical or archaeological resources on or immediately adjacent to the Project Site. In accordance with Senate Bill 18 and Assembly Bill 52, Native American tribes that have traditional lands or cultural places located within the Project Site and vicinity will be consulted. The Program EIR will provide mitigation measures as needed.

- ▶ **Energy:** The Program EIR will discuss the potential impacts of the project's energy usage, emphasizing any inefficient, wasteful, or unnecessary energy consumption, including an analysis of any change in vehicle miles traveled. The Program EIR will provide mitigation measures as needed.
- ▶ **Geology and Soils/Mineral Resources:** The Program EIR will summarize the setting and describe the potential effects from soil erosion, earthquakes, liquefaction, and expansive soils, as well as identify any unique geological features within the Project Site. The chapter will also include an assessment of potential impacts to paleontological resources from project implementation. Mineral resources will also be discussed in this chapter. The Program EIR will provide mitigation measures as needed.
- ▶ **Hazards and Hazardous Materials:** The Program EIR will evaluate the potential for existing or possible hazardous materials within the Project Site and the potential for on-site hazardous materials usage. Those schools that are located near the Project Site will be identified. The Program EIR will provide mitigation measures as needed.
- ▶ **Hydrology and Water Quality:** The Program EIR will evaluate the potential for on- and off-site drainage and flooding impacts, and any effects of construction and operation of the project on water quality. The Program EIR will provide mitigation measures as needed.
- ▶ **Land Use and Planning:** The Program EIR will evaluate the project's land use relative to the City's General Plan, BMC, and other relevant City policies and programs. In addition, the Program EIR will examine any possible land use conflicts with existing neighboring uses and communities. The chapter will recommend mitigation measures, if necessary.
- ▶ **Noise and Vibration:** The Program EIR will evaluate noise increases and impacts to neighboring sensitive receptors resulting with increased construction and operational activities, and ground vibration due to construction and truck movements. The significance of transportation noise impacts will be determined in relation to the City's General Plan. The Program EIR will provide mitigation measures as needed.
- ▶ **Population and Housing/Public Services/Recreation:** The Program EIR will evaluate the potential for the project to induce direct and indirect population growth. Information from the City's General Plan, as appropriate, and up-to-date information received from appropriate City and other agencies will be utilized to address the project's potential to create impacts related to population and housing, public services, and recreation. The Program EIR will provide mitigation measures as needed. The Program EIR will also discuss how the project complies with the State's policies relating to increased housing.
- ▶ **Transportation/Traffic:** The Program EIR will evaluate potential project impacts on traffic and recommend mitigation measures as needed.
- ▶ **Utilities and Service Systems:** The Program EIR will evaluate and discuss potential impacts related to water, wastewater, solid waste, fire protection, police, schools, parks, recreation, and other public facilities and services, and provide mitigation measures as needed.

The following topics will not be discussed further in the Program EIR:

- ▶ **Agriculture and Forestry Resources:** According to the California Important Farmland Finder database and "California Important Farmland Finder Map," the Project Site and immediate surroundings are classified as "Urban and Built-Up Land." There are no agricultural lands (including lands classified by the California Resources Agency as Prime Farmland, Unique Farmland, or Farmland of Statewide Importance) or forest lands within or in proximity to the Project Site. Therefore, no impacts on agriculture and forestry resources are anticipated, and this topic will not be discussed further in the Program EIR.
- ▶ **Wildfire:** According to the California Department of Forestry and Fire Protection's "California Department of Forestry and Fire Protection Fire Hazard Severity Zone Viewer," the Project Site and vicinity are not located within a "Very High Fire Hazard Severity Zone (VHFHSZ)." Therefore, no impacts related to wildfire are anticipated, and this topic will not be discussed further in the Program EIR.

Alternatives To Be Evaluated

In accordance with the CEQA Guidelines Section 15126.6, the Program EIR will describe a range of reasonable alternatives to the project that are capable of meeting most of the project's objectives, and would avoid or substantially lessen any of the significant effects of the project. The Program EIR will also identify any alternatives that were considered but rejected by the lead agency as infeasible and briefly explain the reasons why. The Program EIR will provide an analysis of the No-Project Alternative and will also identify the environmentally superior alternative.

Opportunity For Public Comment

Agencies and interested parties may provide the City with written comments on topics and issues to be discussed and analyzed in the Program EIR. Based on CEQA Guidelines Section 15082(b), comments should be provided within 30 days of receipt of this NOP. Therefore, comments should be provided no later than 5:00 PM on **July 25, 2024**. Please send all comments to:

City of Bellflower
Planning Department
16600 Civic Center Drive
Bellflower, CA 90706
Contact: Elizabeth Oba, Director of Planning and Building Services; (562) 804-1424 ext. 2276; eoba@bellflower.org

Agencies that use the Program EIR when considering permits or other approvals for the project should provide the name of a contact person, phone number, and email address. Comments provided by email should include "**Hollywood Sports Park Proposal (General Plan Amendment No. 24-01 and Zone Change No. 24-01)**" in the subject line, and the name and business address of the commenter in the email.

The City will conduct a Program EIR Scoping Meeting to gather additional input on the scope and contents for the Program EIR and analysis. The location, time, and date for the Scoping Meeting is as follows:

Bellflower City Hall, 2nd Floor, Green Room
16600 Civic Center Drive, Bellflower, CA 90706
2:00 PM on Wednesday, July 10, 2024.

Elizabeth Oba, Director of Planning and Building Services, City of Bellflower

Hollywood Sports Park General Plan Amendment No. 24-01 and Zone Change No. 24-01
City of Bellflower



April 2024



City of Downey

April 29, 2024

Meghna Khanna
Project Manager
Los Angeles County Metropolitan
Transportation Authority, MS 99-22-7
One Gateway Plaza, Los Angeles, CA 90012

Transmitted via email to:
sgl@metro.net

SUBJECT: Comment Letter – Notice of Availability of Final Environmental Impact Report for the West Santa Ana Branch Transit Corridor Project (Southeast Gateway Line)

Dear Mr. Khanna,

Thank you for providing the City of Downey with the opportunity to review and provide comments for the Public Review Final Environmental Impact Report (Final EIR) for the West Santa Ana Branch Transit Corridor Project, which was released for public review on March 29, 2024, until April 29, 2024. The final EIR indicates that the Federal Transit Administration (FTA) and the Los Angeles County Metropolitan Transportation Authority (Metro) are the lead agencies under the California Environmental Quality Act (CEQA).

As described in the Final EIR, the project plans include a better transit system with a new light rail transit (LRT) line to southeast LA County. This project would connect Artesia, Cerritos, Bellflower, Paramount, Downey, South Gate, Cudahy, Bell, Huntington Park, Vernon, unincorporated Florence-Firestone, and downtown Los Angeles. The project would have a station on Gardendale and Dakota Street, within the boundary of the Rancho Los Amigos South Campus Specific Plan.

Upon receipt of the Final EIR, it was distributed to the City departments for review and provided below, are the commenters and comments received for your consideration:

Commenter	Comment
Kelly Ribuffo Senior Project Manager Sagecrest Planning & Environmental City of Downey Planning Division	1. The Metro EIR does not comprehensively reference the recently approved Rancho Los Amigos South Campus Specific Plan. Given this document specifically contemplates the new Gardendale station and has design standards associated with it, I believe it is important the document reference the correct specific plan, as it appears to reference the old Rancho Business Park and Rancho Los Amigos Specific Plans in most instances. The new development is mentioned in a brief way as a “future development project”, mentioned it as approved in one place

Future Unlimited

CIVIC CENTER
1111 BROOKSHIRE AVE.
PO BOX 7016
DOWNEY, CALIFORNIA
90241-7016
562-869-7331
www.downeyca.org

LIBRARY
11121 BROOKSHIRE AVE.
DOWNEY, CALIFORNIA
90241-7016
562-904-7360
www.downeylibrary.org

POLICE DEPARTMENT
10911 BROOKSHIRE AVE.
PO BOX 7016
DOWNEY, CALIFORNIA
90241-7016
562-861-0771

PARKS & RECREATION
7850 QUILL DR.
DOWNEY, CALIFORNIA
90242
562-904-7238

UTILITIES DIVISION
9252 STEWART & GRAY RD.
DOWNEY, CALIFORNIA
90241-7016
562-904-7202

MAINTENANCE SERVICES
12324 BELLFLOWER BLVD.
DOWNEY, CALIFORNIA
90242
562-904-7194

	<p>(EIR Page 4-8), and Metro mentions have discussion with the City of Downey about the project, so Metro was aware of the potential development when preparing their EIR. However, Metro should clarify in their document that the previous specific plans are no longer current if that is the case, and reference the new Specific Plan where relevant in its analysis.</p> <p>2. The station location would require closing off the westbound turn lane on Dakota, which is used primarily by truck traffic from the surrounding area. Gardendale and Dakota are not designated as truck routes in the General Plan Circulation Element. The project proposes to reroute vehicular/pedestrian/bike access to adjacent streets. Street conditions were not analyzed in the EIR to confirm with the City of Downey Public Works Department whether or not the street can withstand the increase in traffic and pedestrian demand. EIR should confirm with staff to ensure streets can temporary withstand the increased demand.</p> <p>3. Project construction in the ROW could require pruning or removal of existing street trees. There do appear to be mature magnolia trees on the north side of Gardendale Street, unclear if they are in the ROW or private property. Metro proposes Mitigation Measures BIO-4 to address. This should require consistency with design standards of the Specific Plan in terms of ROW improvements and landscaping.</p>
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It is requested that any subsequent project documents (e.g., the Final EIR, public hearing notices for the Draft and Final EIRs, and any supplemental environmental documents), as well as a copy of the Certified Final EIR, be forwarded to my attention.

Should you have any questions, or if you require additional information concerning the comments provided herein, please contact me at (562) 904-7151, or at ihuitron@downeyca.org.

Sincerely,

Irma Huitron
Director of Community Development

cc: City Manager's Office

Future Unlimited



Thank you for the opportunity to comment on the Southeast Gateway Line Regional Project. The following items are concerns related to the findings described in the executive summary labeled Table S.2. (potential transportation impacts and mitigation measures).

- Traffic Operations – the LPA will result in impacts at 19 intersections during one or both peak periods. Signalization strategies to minimize impacts are not adequate pursuant to the City of Huntington Park General Plan for peak period intersection analysis. The document does not adequately describe methodologies for which engineering factors up to and including grade separation of intersections to adequately mitigate the project's impact.
- Parking – the LPA will result in adverse effects related to on and off-street parking or spill over parking. Mitigation measures to the project do not adequately address the loss of on street parking throughout the Randolph corridor in the City of Huntington Park. In addition, no parking facilities are included at the two transit stations in Huntington Park.
- Land use – mitigation measure LU-1 does not adequately address consistency with bike trail plans through Randolph corridor. In addition, the project will physically divide an established community.
- Acquisitions and displacement – the LPA will require full and partial acquisitions on approximately 206 parcels without identifying the impacts to acquisitions and displacement of residence in Huntington Park.
- Air quality – due to additional rail crossings that have the potential to cause significant queuing of vehicle and commercial truck traffic at intersections being used by light rail will have an increase air quality component due to idling of commercial vehicles including diesel exhaust pollutants.
- Parklands and Community facilities – the LPA will require the right of way (ROW) to be taken adjacent to Salt Lake Park with no proposed remediation. This will have significant impacts on the beneficial use of parkland for recreational purposes.

- Safety and Security – the LPA does not adequately address the need for enhance security and the adverse effects that will be placed on local police to properly secure rail stations and on train incidents within the jurisdictional boundaries of Huntington Park.
- Land Use – the LPA does not address changes in land use to transit oriented development due to the proposed rail stations at 2 locations in the City of Huntington Park.



Steve Forster
Community Development Director /
Acting Public Works Director

From: Matt Dante <MATT.DANTE@DANTEVALVE.COM>
Sent: Friday, May 3, 2024 11:22:28 AM
To: Lam, Brian <LamB@metro.net>
Cc: Khanna, Meghna <KhannaM@metro.net>; Dierking, Mark <DierkingM@metro.net>; Yvette Ximenez <yximenez@arellanoassociates.com>
Subject: RE: [EXTERNAL] RE: SGL public comment: Matt Dante

Thank you, Brian.

We're pleased to know there is a mitigation plan for the switch.

Regards,

Matt Dante
Vice President
P: 562.866.6680 ext. 4230
F: 562.925.7007
www.dantevalve.com



[LinkedIn](#) | [Twitter](#) | [Instagram](#) | [Facebook](#)

From: Lam, Brian <LamB@metro.net>
Sent: Thursday, May 2, 2024 3:51 PM
To: Matt Dante <MATT.DANTE@DANTEVALVE.COM>
Cc: Khanna, Meghna <KhannaM@metro.net>; Dierking, Mark <DierkingM@metro.net>; Yvette Ximenez <yximenez@arellanoassociates.com>
Subject: [EXTERNAL] RE: SGL public comment: Matt Dante

Hi Matt,

Great chatting with you again earlier. As I mentioned on the phone, the track switch and associated vibration from the switch is captured in the analysis for the trackwork of the mainline track alignment. A mitigation measure for this track switch is included as VIB-2 (Low Impact Frogs). You can find additional information in [Chapter 4 of the](#)

[Final EIS/EIR](#) on page 295 of 797. In Table 4.7.10, cluster number V234 is the track switch near the Dante Valve facility.

In addition to mitigation VIB-2, other project measures and mitigations will be done to further minimize vibration impacts including VIB PM-1 (Construction vibration near sensitive facilities) and VIB-1 (ballast mat or resistant rail fasteners).

Hope this helps clarify and alleviate some of your concerns. Please feel free to reach out to me if you have any other questions/concerns.

Thank you!

Brian Lam
LA Metro
Manager, Transportation Planner
Countywide Planning & Development
213.922.3077
metro.net | facebook.com/losangelesmetro | @metrolosangeles
[Metro's mission is to provide world-class transportation for all.](#)

Hello,

We would like to articulate our concern regarding the "no-mitigation" plan for the potential vibration at the MSF facility switch near our property. Please have this considered in the FTA's decision. And if there is a plan for mitigation, we'd like to know more about it.

Regards,

Matt Dante

Vice President
P: 562.866.6680 ext. 4230
F: 562.925.7007

www.dantevalve.com

Notification/Warning: This message may contain confidential intellectual property, proprietary information and secret or protected processes including technical data (collectively "Restricted Materials and Data"), the distribution of which is restricted by the Arms Export Control Act (the "AEC Act"), found in Title 22 U.S.C. SEC. 2751 ET SEQ., Executive Order 12470 and/or the International Traffic in Arms Regulations ("ITAR"). Restricted Materials and Data may not be transferred to any foreign person in the United States or abroad, except as authorized by the U.S. Department of State

or the U.S. Department of Commerce. Violators of the AEC Act, Executive Order 12470 and/or ITAR are subject to serious criminal penalties and/or fines.

Allen Matkins

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Attorneys at Law
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Paige H. Gosney
E-mail: pgosney@allenmatkins.com
Direct Dial: 949.851.5444 File Number: 395065.00001/4857-9041-9640.3

Via Electronic Mail (sgl@metro.net)

April 24, 2024

Los Angeles County Metropolitan
Transportation Authority
Attn: Meghna Khanna, Project Manager
One Gateway Plaza, M/S 99-22-7
Los Angeles, CA 90012

**Re: Notice of Objection to Final EIS/EIR for Southeast Gateway Line
Project and Proposed Condemnation of Property and Cold Storage
Warehouse Facility Located at 9415 Burtis Street, City of South Gate**

Dear Ms. Khanna:

This firm represents Konoike-Pacific California, Inc. (“KPAC”) in connection with its ownership of the 4.7-acre property located at 9415 Burtis Street in the City of South Gate (“KPAC Property”). The KPAC Property is situated west of the Los Angeles River and immediately adjacent to and east of the existing railroad corridor that will be expanded as part of the Los Angeles County Metropolitan Transportation Authority’s (“LACMTA”) proposed Southeast Gateway Line Project (formerly the West Santa Ana Branch Transit Corridor Project) (“SGL Project”), which is intended to connect southeast Los Angeles County with downtown Los Angeles via construction of a new 14.5-mile light rail transit line with nine (9) new transit stations. In the Final Environmental Impact Statement (“EIS”)/Environmental Impact Report (“EIR”) for the SGL Project, the LACMTA and Federal Transit Administration (“FTA”) have identified the KPAC Property for condemnation and use as a construction staging and laydown area for the SGL Project.

The KPAC Property is developed with an 82,180-square-foot industrial cold storage warehouse facility that was recently constructed in 2017 at a cost of more than \$28 million (“KPAC Facility”). The KPAC Facility is the only cold storage warehouse in the City of South Gate, which serves as a critical logistics and distribution hub for goods and materials from the Ports of Los Angeles and Long Beach (“Ports”), and is one of only a handful of cold storage warehouses in the greater Los Angeles metropolitan area. Unlike these other, older cold storage warehouses, the state-of-the-art KPAC Facility is uniquely equipped with an environmentally friendly Ultra Low-Charge Ammonia Refrigeration System that utilizes natural refrigerants and no ozone-depleting artificial refrigerants or other harsh chemicals.

The Final EIS/EIR discloses that after the Draft EIS/EIR was published, the LACMTA and FTA decided, in coordination with Union Pacific Railroad (“UPRR”), to acquire the KPAC Property solely to provide a private benefit requested by UPRR.¹ The LACMTA and FTA never coordinated with or engaged in any outreach to KPAC about their purported need to acquire the KPAC Property or the significant environmental effects that would arise as a result of this acquisition. This discrepancy in the LACMTA’s and FTA’s treatment of and engagement with UPRR and KPAC, as well as the lack of adequate public disclosure and opportunity for public comment on the full acquisition of the KPAC Property and the significant direct and indirect economic and environmental effects that would result from closure of the KPAC Facility, is extremely troubling and legally questionable.

KPAC wishes to register its vehement opposition and objection to the LACMTA’s proposed permanent taking of the KPAC Property for use as a construction staging and laydown area for the SGL Project. The unique nature of the KPAC Facility as one of the only cold storage warehouse facilities in the greater Los Angeles metropolitan area (and potentially the only modern, environmentally friendly cold storage facility in the region) and its location along the 710 Freeway, which feeds directly into the Ports, make it a critical piece of the logistics and supply chain network. More importantly, the City of South Gate’s Zoning Code expressly prohibits new industrial “warehousing” facilities over 15,000 square feet; therefore, the 82,180-square-foot KPAC Facility could not be relocated and reconstructed at a new, different site in the City of South Gate under the current Zoning Code and applicable development regulations.² There is no amount of just compensation that could or would accurately reflect the true value of the KPAC Facility and its importance not only to KPAC and its customers and employees but to the greater distribution and supply chain network that originates from, and is driven by, the Ports.

Moreover, and perhaps more significantly, the proposed taking of the KPAC Property and removal of the KPAC Facility would create significant economic and environmental impacts, the consequences of which are not yet known and have not been accounted for or studied by the LACMTA and FTA. For example, not only would KPAC’s customers and employees be severely affected by elimination of the KPAC Facility (loss of jobs and vital local cold storage infrastructure necessary for the facilitation of goods through the supply chain), but it would require operators to use cold storage facilities located further from the Ports, such as in the Inland Empire where there is more available space and more accommodating industrial development regulations. The effect of this would be to substantially drive up costs to operators and goods producers, which increases would then be passed on to consumers and the general public in the form of higher retail prices.

In addition to the economic consequences, the removal of the KPAC Facility would also give rise to new and increased direct, indirect, and cumulative environmental impacts associated

¹ Final EIS/EIR, Appendix E, p. E-5.

² City of South Gate Municipal Code § 11.20.030, Tables 11.21-3 (fn. 18), 11.21-4 (fn. 11).

Los Angeles County Metropolitan Transportation Authority
April 24, 2024

Page 3

with the use of older cold storage warehouse facilities and the extended transportation of goods to facilities located further away from the Ports. These impacts – which were not studied or disclosed in the Final EIS/EIR – include direct, indirect, and cumulative environmental impacts related to traffic operations, freight, vehicle miles traveled (“VMT”), air quality, greenhouse gas emissions, climate change, noise, safety, land use, environmental justice, and a host of other known and unknown issues. The economic and environmental “ripple effects” of the LACMTA’s and FTA’s proposed taking of the KPAC Property for the SGL Project would be substantial and would involve impacts of a nature and on a scale that the LACMTA and FTA have yet to understand, evaluate, or disclose to the public in accordance with the National Environmental Policy Act (“NEPA”)³ and the California Environmental Quality Act (“CEQA”).⁴

In light of the foregoing, we strongly urge the LACMTA and FTA to identify and utilize an alternative site as a construction staging and laydown area for the SGL Project in lieu of condemnation of the KPAC Property and the forced removal of the KPAC Facility. The KPAC Property is surrounded by several viable alternative sites, including: (i) the properties located immediately adjacent to and south and southeast of the KPAC Property on Burtis Street and across Southern Avenue which have no current active uses or business operations and are presently being marketed for sale; and (ii) the vacant, undeveloped site located southwest of the KPAC Property across the railroad tracks that is also dormant with no current active use or operation. These properties are just as (if not more) suitable for use as a construction staging and laydown area for the SGL Project than the KPAC Property and their condemnation would not require the displacement and removal of an active business operation, particularly one as unique and critical to the supply chain network and movement of goods from the Ports as the KPAC Property and KPAC Facility. This is in addition to the substantially lower acquisition costs and just compensation payment that would be required for condemnation of the KPAC Property and the recently constructed KPAC Facility.

As explained in the remainder of the letter below, the Final EIS/EIR is riddled with numerous defects that render the environmental analysis set forth therein inaccurate, incomplete, unreliable, and unsupported, and the Final EIS/EIR itself fundamentally flawed as an informational document, in violation of NEPA and CEQA. The LACMTA must, accordingly, refuse to certify the Final EIS/EIR. The LACTMA and FTA instead must supplement and recirculate the EIS/EIR to remedy these deficiencies before approving the SGL Project.

The LACMTA and FTA Must Supplement and Recirculate the EIS/EIR.

The Council on Environmental Quality’s NEPA regulations require a lead agency to supplement an EIS when “[t]he agency makes substantial changes to the proposed action that are

³ 42 U.S.C., §§ 4321 *et seq.*

⁴ California Public Resources Code, §§ 21000 *et seq.*

Los Angeles County Metropolitan Transportation Authority
April 24, 2024

Page 4

relevant to environmental concerns” or “[t]here are significant new circumstances or information relevant to environmental concerns and bearing on the proposed action or its impacts.”⁵ They also require a lead agency to prepare and circulate a revised draft EIS when it “is so inadequate as to preclude meaningful analysis.”⁶ FTA’s NEPA regulations similarly require supplementation of an EIS when “[c]hanges to the proposed action would result in significant environmental impacts that were not evaluated in the EIS” or “[n]ew information or circumstances relevant to environmental concerns and bearing on the proposed action or its impacts would result in significant environmental impacts not evaluated in the EIS.”⁷

Similarly, under CEQA, “[a] lead agency is required to recirculate an EIR when significant new information is added to the EIR after public notice is given of the availability of the draft EIR for public review . . . but before certification.”⁸ These circumstances include changes in the project or environmental setting as well as additional data or other information, including a disclosure showing that “(1) A new significant environmental impact would result from the project or from a new mitigation measure proposed to be implemented[;] (2) A substantial increase in the severity of an environmental impact would result unless mitigation measures are adopted that reduce the impact to a level of insignificance[;] (3) A feasible project alternative or mitigation measure considerably different from others previously analyzed would clearly lessen the significant environmental impacts of the project, but the project’s proponents decline to adopt it[; or] (4) The draft EIR was so fundamentally and basically inadequate and conclusory in nature that meaningful public review and comment were precluded.”⁹

As explained throughout this letter, the analysis in the Final EIS/EIR is flawed for numerous reasons, each of which individually and collectively require the LACMTA and FTA to supplement and recirculate the EIS/EIR.

The Full Acquisition of the KPAC Property is a Substantial Change to the SGL Project After Publication of the Draft EIS/EIR Requiring Supplementation and Recirculation of the EIS/EIR.

The full acquisition of the KPAC Property is a substantial change to the SGL Project since the Draft EIS/EIR was published that requires supplementation and recirculation of the EIS/EIR. The SGL Project as analyzed in the Draft EIS/EIR would have required only a narrow temporary construction easement along the length of the KPAC Property adjacent to the existing rail corridor where the SGL Project would be built. After publishing the Draft EIS/EIR, the LACMTA and FTA

⁵ 40 C.F.R., § 1502.9(c)(1) (1978).

⁶ 40 C.F.R., § 1502.9(a) (1978).

⁷ 23 C.F.R., § 771.130(a).

⁸ CEQA Guidelines, § 15088.5(a).

⁹ CEQA Guidelines, § 15088.5(a).

changed the SGL Project to involve full acquisition of the KPAC Property for use as a construction staging and laydown area and removal of the KPAC Facility.

Without the KPAC Facility, KPAC's customers would be forced to use other, older, less environmentally friendly cold storage warehouses that are located further away from the Ports and other origins and destinations. The full acquisition of the KPAC Property and removal of the KPAC Facility would have numerous significant direct, indirect, and cumulative environmental effects that were not evaluated in the Final EIS/EIR, including, but not limited to, impacts on traffic operations, freight, VMT, air quality, greenhouse gas emissions, climate change, noise, safety, land use, and environmental justice. The LACMTA and FTA must supplement and recirculate the EIS/EIR to include adequate analysis of the environmental impacts that would result from full acquisition of the KPAC Property and closure of the KPAC Facility.

The Analysis of Displacement Impacts in the Final EIS/EIR is Flawed and Unsupported by Substantial Evidence, and Must be Remedied in a Supplemental and Recirculated EIS/EIR.

The Final EIS/EIR vastly overstates the number of available industrial properties in the City of South Gate, resulting in flawed analysis and unsupported conclusions. According to Table 4.3.5 in the Final EIS/EIR, there are 130 available industrial properties in the City of South Gate, resulting in a surplus of 124 industrial properties in the City. Based on the asserted "abundance" of surplus properties,¹⁰ the Final EIS/EIR concludes that there will be sufficient number of comparable replacement sites for displaced industrial businesses to relocate within the City of South Gate and that there would be a less than significant impact under CEQA. However, the Final Displacements and Acquisitions Impact Analysis Report discloses that, in fact, there are only 15 (not 130) available industrial properties in the City of South Gate, and therefore a surplus of only 9 (not 124) industrial properties in the City of South Gate.¹¹ This is a significant discrepancy – an order of magnitude – that results in a flawed and unsupported analysis, depriving the public of a meaningful opportunity to understand and comment on the SGL Project's displacement impacts.

In addition, the analysis of displacement impacts is flawed and unsupported because it unreasonably assumes that any industrial parcel currently listed for lease or sale would be adequate for relocation of a displaced industrial business, regardless of the size or location of potential relocation parcels. There is no legal or factual support for this assumption. Cold storage warehouses have unique requirements that directly impact site design and feasibility, including with respect to building height, size, power, and roadway geometry. There are also legal limitations on where a cold storage warehouse could relocate. As noted above, the City of South Gate prohibits new warehouses larger than 15,000 square feet.¹² Therefore, a new 82,000-square-foot cold storage

¹⁰ Final EIS/EIR, § 4.3.5.1.

¹¹ *Final Displacements and Acquisitions Impact Analysis Report*, Appendix A, Table 3.

¹² City of South Gate Municipal Code, § 11.20.030, Tables 11.21-3 (fn. 18), 11.21-4 (fn. 11).

warehouse to replace the existing KPAC Facility legally could **not** be built in the City of South Gate under current laws even if there were an available parcel that otherwise satisfied the unique requirements for a cold storage warehouse of that size. The analysis of displacements in the Final EIS/EIR entirely ignores the special requirements of cold storage warehouses and the City of South Gate's legal restrictions on new warehouses. Based on these unreasonable assumptions, the Final EIS/EIR fails to adequately analyze and disclose the displacement impacts from full acquisition of the KPAC Property as well as other industrial businesses.

Furthermore, in addition to these analytical flaws, the Final EIS/EIR does not support its conclusion that there will be a less than significant impact under CEQA Threshold DIS-1. The Final EIS/EIR discloses that there will be a substantial number of businesses that will be displaced; many of those businesses will require construction of new facilities if they are able to relocate; and many businesses may be unable to relocate within their same city or the surrounding six miles. As discussed above, the Final EIS/EIR significantly overstates the ability of the KPAC Facility and other displaced businesses to relocate within their same city or the surrounding six miles. The Final EIS/EIR makes a conclusory finding, without adequate factual support or explanation, that this will be a less than significant impact under CEQA. The LACMTA and FTA must supplement and recirculate the EIS/EIR with a revised analysis of displacement impacts, based on accurate data and reasonable assumptions, that accounts for the actual number of available replacement properties, the unique requirements of cold storage warehouses, and legal limitations on where the KPAC Facility and other displaced industrial businesses could relocate.

***The LACMTA and FTA Must Supplement and Recirculate the EIS/EIR to Consider Less-
Impactful Alternative Locations for a Construction Staging and Laydown Area.***

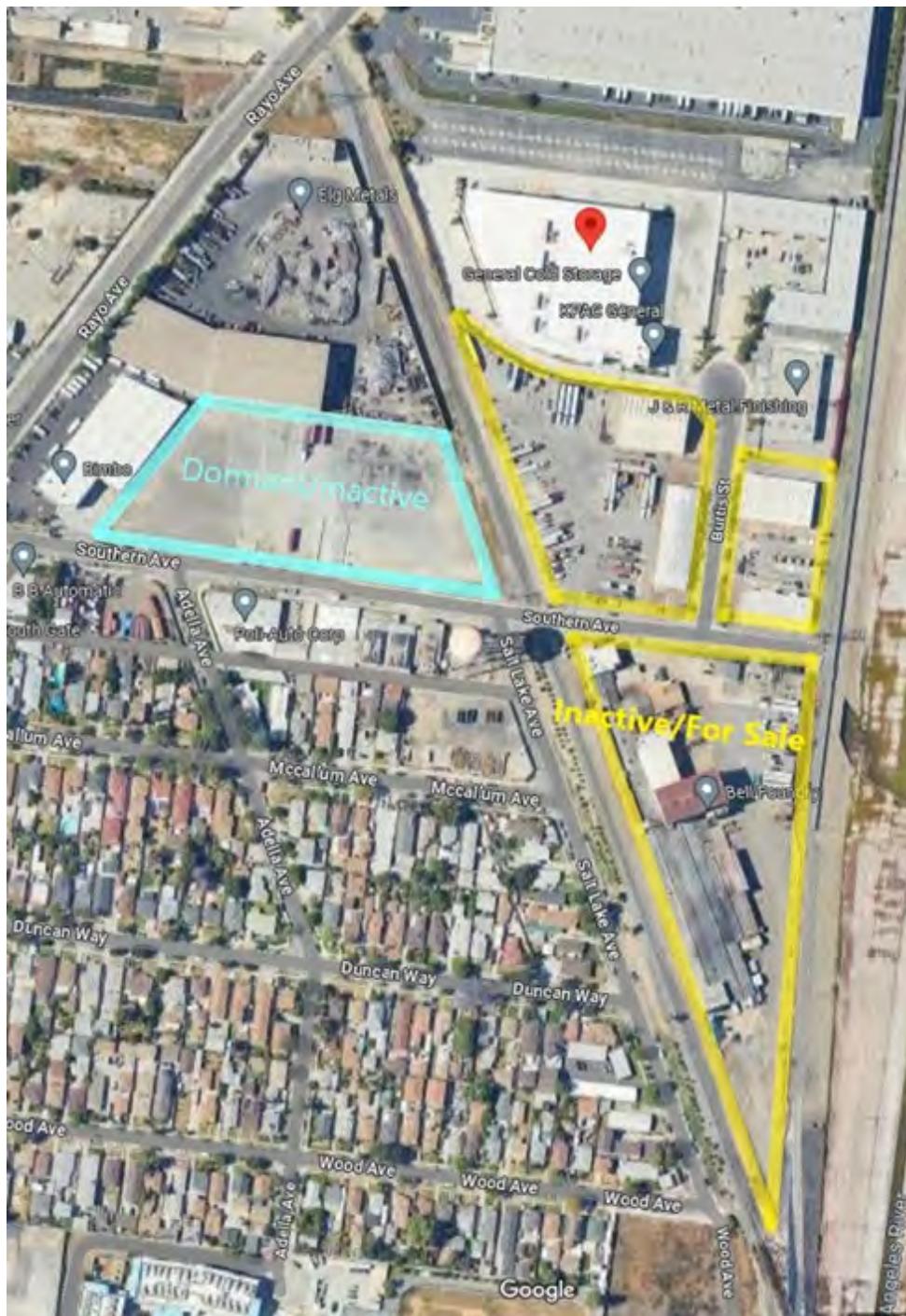
Both NEPA and CEQA require a lead agency to evaluate alternatives and mitigation measures that would avoid or lessen significant environmental impacts. As explained throughout this letter, acquiring the KPAC Property for use as a construction staging and laydown area and removing the KPAC Facility will have enormous environmental effects. The Final EIS/EIR does not explain the SGL Project's construction staging requirements, nor does it explain the LACMTA's reasons for deciding to use the KPAC Property (as opposed to other locations) for a construction staging and laydown area. Thus, it is impossible for KPAC and other members of the public to evaluate and identify other potential locations for construction staging and laydown areas that would meet the SGL Project's construction requirements but with less environmental impacts.

As shown in the diagram below, there are multiple nearby vacant, unoccupied, and underutilized properties adjacent to or in close proximity to the rail corridor and the SGL Project footprint that could satisfy the LACMTA's construction staging requirements for the SGL Project without causing the substantial economic and environmental effects that would result from use of the KPAC Property and displacement of the KPAC Facility, including several properties that have no current active business operation and/or are presently being marketed for sale.

Allen Matkins Leck Gamble Mallory & Natsis LLP
Attorneys at Law

Los Angeles County Metropolitan Transportation Authority
April 24, 2024

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The LACMTA and FTA must supplement and recirculate the EIS/EIR to include an analysis of alternative locations for construction staging and laydown areas.

The Analysis in the Final EIS/EIR is Fundamentally Flawed Because it Relies on Outdated Plans and Models.

NEPA and CEQA require an environmental analysis to be based on accurate and reliable data and information. The Final EIS/EIR fails to meet this fundamental analytical requirement. NEPA and CEQA do not allow a lead agency to completely ignore new information and changed circumstances that arise after it publishes a Notice of Intent or Notice of Preparation of the environmental document. Significant changes that have occurred since 2017, particularly since 2020 – including the growth of telecommuting/work-from-home and decreased transit ridership – are largely ignored in the Final EIS/EIR, rendering the document fundamentally flawed.

For example, the purported need for the SGL Project was based on 2017 data and conditions, and has not been reevaluated in the ensuing seven years. In addition, the analyses of multiple topics throughout the Final EIS/EIR rely upon the Southern California Association of Governments' 2016 Regional Transportation Plan/Sustainable Communities Strategy ("RTP/SCS"). The 2016 RTP/SCS is now two versions out of date: it was superseded by the 2020 RTP/SCS, which was subsequently superseded by the 2024 RTP/SCS. By relying on outdated information and forecasts from the 2016 RTP/SCS instead of the current 2024 RTP/SCS, the Final EIS/EIR's analysis of multiple topics, including, but not limited to, transportation, air quality, transportation conformity, greenhouse gas emissions, regional growth, economic and fiscal impacts, and cumulative impacts, is flawed. Furthermore, the analysis of air quality and greenhouse gas emissions in the Final EIS/EIR relies upon an outdated version of the California Emissions Estimator Model ("CalEEMod"), using version 2020.4.0, instead of the current version 2022.1.1.22.

The LACMTA and FTA must supplement and recirculate the EIS/EIR with a revised analysis based on *current* data and information, including, but not limited to, the 2024 RTP/SCS and CalEEMod version 2022.1.1.22.

The Final EIS/EIR Improperly Considers Mitigation Measures to be "Project Measures."

The Final EIS/EIR includes numerous mitigation measures that are improperly referred to as "project measures," violating two important principles of CEQA. First, the failure to "separately identify and analyze the significance of the impacts . . . before proposing mitigation measures . . . subverts the purposes of CEQA by omitting material necessary to informed decision-making and informed public participation. It precludes both identification of potential environmental consequences arising from the project and also thoughtful analysis of the sufficiency of measures to mitigate those consequences."¹³ Second, many of these measures, including, but not limited to, Project Measures GEO PM-1, GEO PM-2, HAZ PM-1, HAZ PM-3, HAZ PM-4, HAZ PM-6, HAZ PM-9, BIO PM-1, are improperly deferred mitigation because it is feasible to include details about

¹³ See *Lotus v. California Department of Transportation* (2014) 223 Cal.App.4th 645, 658.

Allen Matkins Leck Gamble Mallory & Natsis LLP
Attorneys at Law

Los Angeles County Metropolitan Transportation Authority
April 24, 2024

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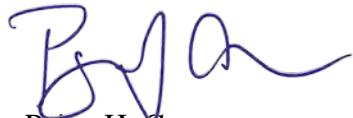
mitigation in the Final EIS/EIR, the measures do not contain specific performance standards, and/or the measures do not identify the types of potential actions that can feasibly achieve a performance standard (if such a standard is even identified).¹⁴ The LACMTA and FTA must recirculate the EIS/EIR to: (i) properly disclose that project measures are, in fact, mitigation measures, (ii) revise the CEQA analysis of impact significance accordingly, and (iii) modify those mitigation measures to avoid improper deferral of mitigation.

* * *

As outlined above, KPAC strongly objects to and opposes the use of the KPAC Property for the SGL Project because removing the KPAC Facility will result in severe economic and environmental effects that the LACMTA and FTA have failed to consider and/or adequately analyze in the EIS/EIR. The LACMTA and FTA must supplement and recirculate the EIS/EIR to analyze and disclose these adverse effects in accordance with NEPA and CEQA, to analyze alternative locations for a construction staging and laydown area, and to remedy other legal deficiencies with the Final EIS/EIR. KPAC strongly urges the LACMTA and FTA to use an alternative site as a construction staging and laydown area for the SGL Project in lieu of taking the KPAC Property and forcing removal of the KPAC Facility.

Please contact me if you have any questions and/or if you would like to discuss this letter and the comments and concerns set forth above in further detail.

Very truly yours,



Paige H. Gosney

cc: Charlene Lee Lorenzo, Senior Director (Charlene.LeeLorenzo@dot.gov)
Federal Transit Administration, Region 9
888 S. Figueroa Street, Suite 440
Los Angeles, CA 90017

Rusty Whisman, Senior Transportation Program Specialist (russell.whisman@dot.gov)
Federal Transit Administration, Region 9
888 S. Figueroa Street, Suite 440
Los Angeles, CA 90017

¹⁴ See CEQA Guidelines, § 15126.4(a)(1)(B).

From: Jaeger, Spencer
Sent: Friday, April 26, 2024 3:49 PM
To: lewis@kramermetals.com
Cc: Carlson, Kristin; Loya, Rene; Meghna Khanna; Brian Lam; Alvarez, Brandy; Stadelmann, Charlotte Ramos
Subject: Southeast Gateway Line Project Follow Up
Attachments: Slauson A Line Station Plan Sheet.pdf; Acquisition Map - Kramer Metals.pdf; 20240426 Kramer Metals - Acquisition Information.docx
Categories: To File

Hi Lewis,

Please see the attached materials to follow up on our conversation from April 15th regarding the Southeast Gateway Line project. The attached word file identifies responses to each of the items we discussed on the call related to the Kramer Metals property. The PDF attachments are supplemental items from the Final EIS/EIR to go along with the responses in the Word file.

Thanks,



Spencer Jaeger
Senior Consultant - Planner
EIT
he/him/his

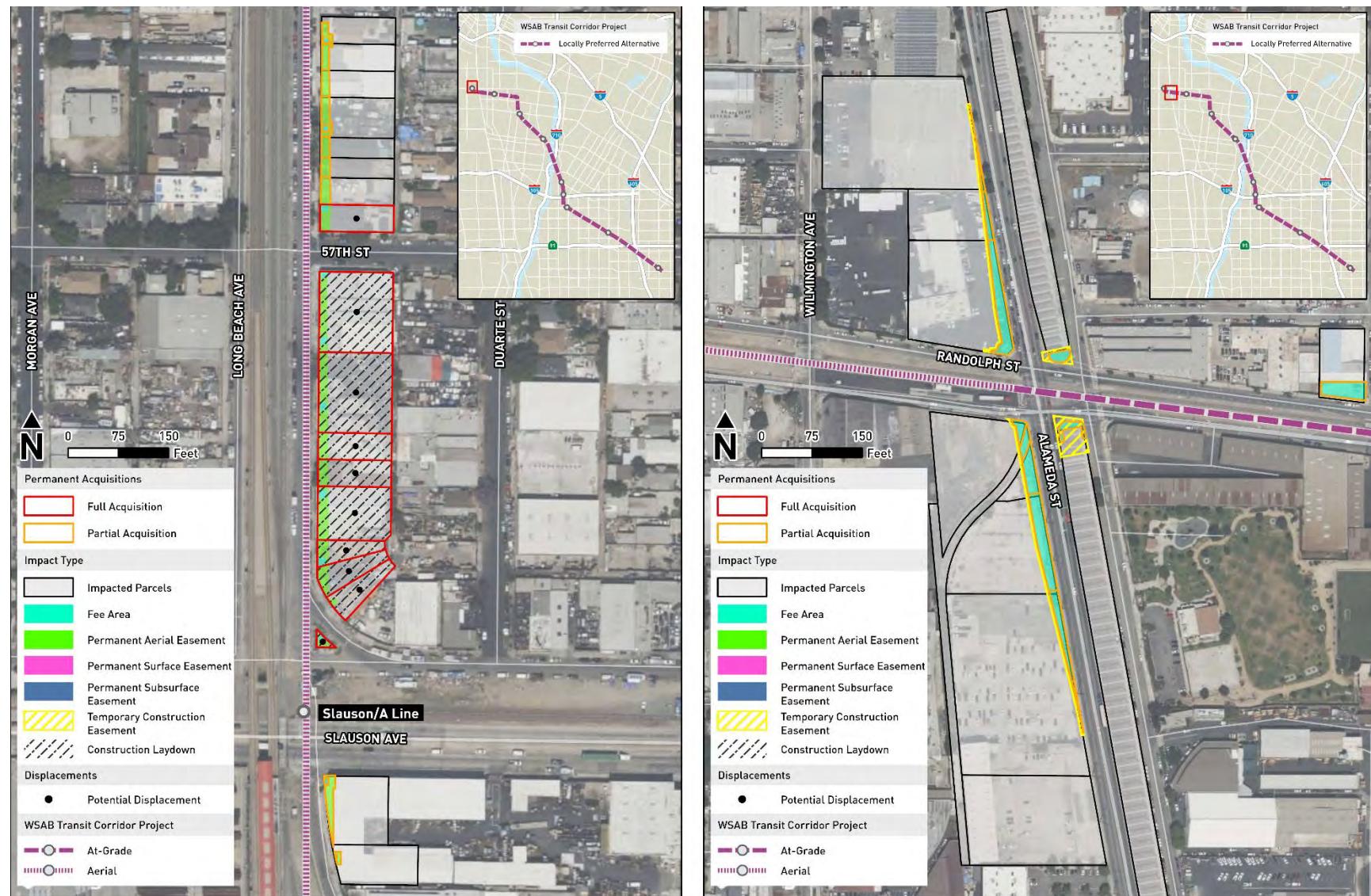
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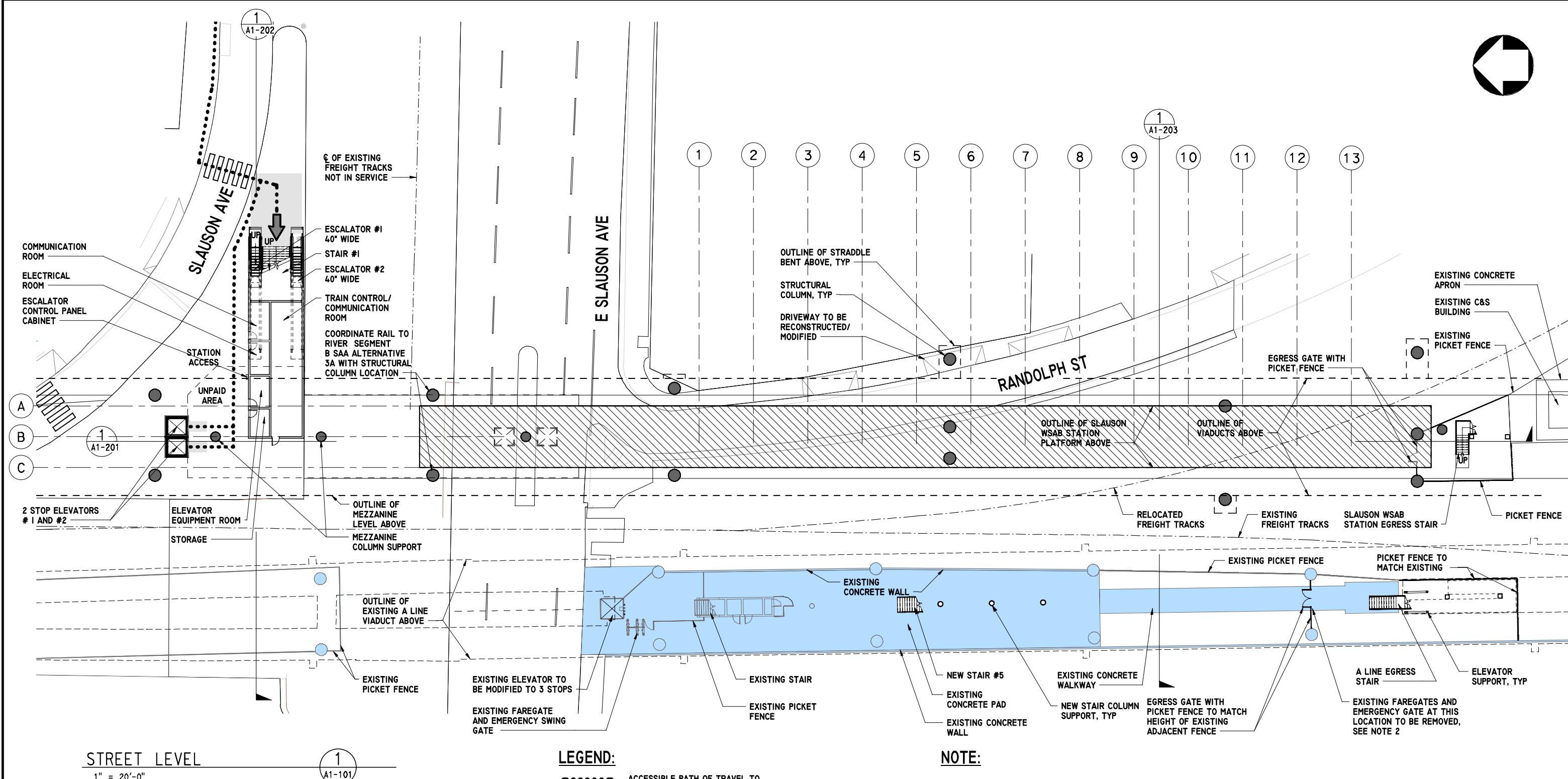
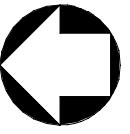
- General design of the project in this area
 - o The northern terminus for the West Santa Ana Branch line (now Southeast Gateway Line) at the Slauson/A Line Station will be located west of the Kramer Metals property. An aerial station will be constructed adjacent to the existing A Line station, east of the existing A Line station platform. Pedestrian bridges will connect the two platforms. The main station entrance will be located north of Slauson Avenue, with the station platform above Slauson Avenue and Randolph Street. The bottom of the aerial structure will be approximately 27 feet above grade, with vertical circulation elements (i.e., escalators, stairs, and elevators) up to approximately 70 feet above grade. The station is a center-platform design, so LRT tracks will straddle the station platform near the Kramer Metals property and run along the outer edge of the viaduct structure. See the attached Slauson/A Line Station plan sheet for additional details on the design in this area.
- Scope of proposed taking on the property
 - o The aerial Slauson/A Line Station will be constructed between the existing A Line aerial station platform and Randolph Street. Support columns are required on the east side of Randolph Street, partially affecting the private property. Two temporary construction easements, a permanent aerial easement, and two permanent partial acquisitions have been identified on this property based on the current level of design. The temporary construction easements will be required for construction activities for the aerial Slauson/A Line Station platform. The permanent aerial easement will be required where the station structure will overhang (be located above) the property. The permanent partial acquisitions will be required to accommodate the support columns for the aerial structure. Construction is expected to begin in 2026 with project opening in 2035.
- Proposed language of the taking
 - o Specific language is not identified for each property acquisition at this stage of the project, as such, general language is included in the Final EIS/EIR to describe the acquisition process. Section 4.3.3.2 of the Final EIS/EIR states: "Metro will compensate owners at fair market value to purchase the required property and will compensate owners for damages to the remainder property as applicable. Residents of fully acquired properties will be displaced, and, if eligible, will be provided relocation benefits in accordance with applicable regulations. Residents affected by partial acquisitions may also be eligible for relocation benefits. Partial acquisitions will be analyzed to determine eligible benefits. Further information will need to be obtained during discussions with owners at the time of acquisition, as further discussed directly below under the heading 'Replacement and Relocation'."
- What is allowed under the aerial easement and the height of the aerial easement
 - o The bottom of the aerial structure will be approximately 27 feet above grade, with the platform level at approximately 40 feet above grade. The eastern edge of the viaduct will overhang the western portion of the Kramer Metals property. Specific requirements/restrictions below the aerial easement have not been identified at this stage of the project and would be determined during the property acquisition process.
- Current use on the property as identified in environmental document
 - o Specific private properties are not described in detail in the Final EIS/EIR. The property is shown in the acquisition map (attached) and on design plans. No change to the overall use of the property is proposed as part of the project.
- Future restrictions to the property

- Restrictions to the property have not been identified at this stage of project. Metro will work with the affected property owner during the property acquisition process, which would begin after the Federal Transit Administration issues the Record of Decision, anticipated in Summer 2024. Through the acquisition process, additional details regarding each property impact, including any potential restrictions to the property, will be further identified.

Figure 4.3-1. Property Acquisitions for the Locally Preferred Alternative



Source: Metro 2024m



FINAL ADVANCED CONCEPTUAL STATIONS DESIGN

THE PREPARATION OF THIS
DRAWING HAS BEEN FINANCED IN
PART THROUGH A GRANT FROM
THE U.S. DEPARTMENT OF
TRANSPORTATION FEDERAL TRANSIT
ADMINISTRATION (FTA), UNDER THE
FEDERAL TRANSIT ACT OF 1964, AMENDED,
AND IN PART BY THE TAXES OF THE CITIZENS OF LOS
ANGELES COUNTY AND OF THE
STATE OF CALIFORNIA.

STATE OF CALIFORNIA.

FINAL STATE

LEGEND

- ACCESSIBLE PATH OF TRAVEL TO STATION ACCESS
- TRACK CENTERLINE
- QUEUING AREA PER MRDC TABLE 6
- EXISTING A LINE STATION
- ▨ EXTENT OF SLAUSON STATION PLATFORM OVERHEAD

NOTE

- I. THE QUEUING FOR THE 4-DEVICE (ESCALATORS #1 & 2 & STAIR #1) AT STREET LEVEL IS LESS THAN THE MRDC REQUIREMENT. THIS DEVIATION IS A RESULT OF THE STREET CURVATURE OF LONG BEACH AVENUE.
2. EXISTING ITEMS ARE REMOVED FOR NEW PICKET FENCE AND EMERGENCY EGRESS ONLY GATE FROM ADJACENT A LINE NEW EGRESS STAIR.

M Metro

LOS ANGELES COUNTY
METROPOLITAN TRANSPORTATION AUTHORITY

WSP 515 So
Suite

th Figueroa Street SUBMITTED _____
400
eles, CA 90071
131-362-0470 APPROVED _____

WEST SANTA ANA BRANCH LRT
ARCHITECTURAL
SLAUSON/A LINE STATION
STREET LEVEL PLAN
AERIAL STATION

NOT FOR CONSTRUCTION

CONTRACT NO	
AE5999300	
DRAWING NO	REV
A1-101	
SCALE	1" = 20'-0"
SHEET NO	
4 OF 37	

THE SILVERSTEIN LAW FIRM

A Professional Corporation

215 NORTH MARENGO AVENUE, 3RD FLOOR
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WWW.ROBERTSILVERSTEINLAW.COM

April 29, 2024

VIA EMAIL sgl@metro.net and U.S. Mail

Meghna Khanna
Project Manager
Los Angeles County Metropolitan Transportation
Authority
One Gateway Plaza, Mail Stop 99-22-7
Los Angeles, CA 90012

VIA EMAIL Charlene.LeeLorenzo@dot.gov;

russell.whisman@dot.gov and U.S. Mail

Charlene Lee Lorenzo
Senior Director
Rusty Whisman
Senior Transportation Program Specialist
Federal Transit Administration, Region 9
Los Angeles Metropolitan Office
888 S. Figueroa St., Suite 440
Los Angeles, CA 90017

Re: Comments on the Final Environmental Impact Statement/Environmental Impact Report (EIS/EIR) for the West Santa Ana Branch Transit Corridor Project (now Southeast Gateway Line)
(State Clearing House No. 2017061007)

Dear Project Manager, Senior Director and Senior Transportation Specialist for the EIS/EIR for the West Santa Ana Branch Transit Corridor Project:

I. INTRODUCTION.

This firm and the undersigned represent Kramer Metals, Inc., (“Kramer”) a family company located at 1760 East Slauson Avenue. At the beginning of April, 2024 our client received a letter from the Los Angeles County Metropolitan Transportation

Authority (“Metro”), notifying our client that their property and business would be impacted by the proposed West Santa Ana Branch Transit Corridor Project (now Southeast Gateway Line) (“proposed Project” or “Project” or “Action”) and informing our client of the need to comment by April 29, 2024 for comments to be included in the Federal Record of Decision (“ROD”). We therefore provide these comments in advance of the Record of Decision for the Final Environmental Impact Statement (“FEIS”) and reserve the right to provide additional comments in advance of Metro’s review and consideration of the Final Environmental Impact Report (“FEIR”). Thank you in advance for considering these comments.

We have reviewed the Final Environmental Impact Statement/Environmental Impact Report for the West Santa Ana Branch Transit Corridor Project (“FEIS/FEIR”). The FEIS/FEIR fails to comply with the requirements of the California Environmental Quality Act (“CEQA”)¹ and the National Environmental Policy Act (“NEPA”).² The Metro Board should reject certification of the FEIS/FEIR and the Federal Transit Administration (“FTA”) should reject adoption of the Record of Decision pending correction of defects.

II. PROJECT HISTORY.

- Metro issued a Notice of Preparation (“NOP”) pursuant to CEQA on May 25, 2017 regarding its intent to prepare a combined Environmental Impact Statement/Environmental Impact Report (“EIS/EIR”) for the Project and notifying interested agencies and parties of public scoping meetings.³
- According to page 701 of the FEIS/FEIR, a revised NOP was issued on June 14, 2017 regarding extension of the comment period from July 7, 2017 to August 4,

¹ California Public Resources Code Section 21000 et. seq. and the CEQA Guidelines, Title 14, Division 6, Chapter 3, Sections 15000 et seq. of the California Code of Regulations

² 42 U.S. Code §4321-4347. Available at: <https://www.energy.gov/sites/default/files/2023-08/NEPA%20reg%20amend%2006-2023.pdf>

Council on Environmental Quality (“CEQ”) NEPA Regulations, Title 40 Part 1500 et seq. of the Code of Federal Regulations (“CFR”) as amended July 2020. Available at: <https://www.ecfr.gov/current/title-40/chapter-V/subchapter-A/part-1500>

FTA NEPA Regulations, CFR Title 23, Chapter 1, Subchapter H, Part 771 et. seq. Available at: <https://www.ecfr.gov/current/title-23/chapter-I/subchapter-H/part-771>

³ FEIR page 7-1.

2017. According to CEQAnet, the revised NOP and Notice of Completion (“NOC”) for the Draft Environmental Impact Report (“DEIR”) for the Project was issued on June 6, 2017.⁴ As stated in the NOP:

The project is **a proposed LRT line that would extend approx 20 miles from Downtown LA through southeast LA County**, traversing densely populated, low-income and heavily transit-dependent communities. The project would provide reliable, fixed guideway transit service that would increase mobility and connectivity for historically underserved, transit-dependent communities; reduce travel times on transportation networks; and accommodate substantial future employment and population growth. **The project will analyze multiple potential alignments, including four alignment options in the northern section** - Pacific/Alameda, Pacific/Vignes, Alameda, and Alameda/Vignes; the San Pedro Branch located in the central section of the study area; and the Metro-owned ROW located in the southern section of the study area. (Emphasis added).

- The FTA published the Notice of Intent (“NOI”) pursuant to NEPA in the Federal Register on June 26, 2017, to initiate the Environmental Impact Statement (“EIS”) process for the Project.⁵ The NOI states that:

The EIS process will evaluate alternatives recommended for further study as a result of the planning Alternatives Analysis approved by the Southern California Association of Governments in February 2013 and the Project Definition for Environmental Scoping **including four Northern Alignment Options** approved by the Metro Board on April 27, 2017, and available on the Metro Web site (www.metro.net/wsab). (Emphasis added).
- A second revised NOP was issued on July 11, 2018, informing the public of the Metro Board’s decision to eliminate some of the northern alignment alternatives

⁴ <https://ceqanet opr.ca.gov/2017061007>

⁵ Federal Register. Vol. 82, No. 121, June 26, 2017.
<https://www.federalregister.gov/documents/2017/06/26/2017-13204/preparation-of-an-environmental-impact-statement-for-west-santa-ana-branch-transit-corridor-project>

considered in the May 25, 2017 NOP and to carry forward two modified northern alignments, one to the Downtown Transit Core and the other to Los Angeles Union Station (“LAUS”), into the Draft EIS/EIR process.⁶ The comment period specified in this second NOP was from July 11, 2018 to August 24, 2018. The number of northern alignments analyzed was thus reduced between the issuance of the two NOPs from four alignment options to two. The July 11, 2018 NOP stated:

The Project is a proposed LRT line that would extend approx. 20 miles from downtown LA, through southeast LA County, to a terminus within or near the City of Cerritos, traversing densely populated, low-income and heavily transit-dependent communities. The project would provide reliable, fixed guideway transit service that would increase mobility and connectivity for historically underserved, transit-dependent communities; improve travel times on local and regional transportation networks relative to not making this investment; and accommodate substantial future employment and population growth. The project would provide reliable transit service to meet the future mobility needs of residents, employees, and visitors who travel within the Study Area. The project includes two possible alignment alternatives in the north: Alternatives E and G; utilizes the San Pedro Branch Right-of-Way in the central section; and the Metro-Owned Right-of-Way in the southern section of the Study Area. The project proposes to develop approx. 15 rail stations along the LRT line and identify transit oriented community land use concepts and first/last mile pedestrian bicycle connectivity opportunities associated with the proposed stations. The project will also consider the development of ancillary facilities such as a maintenance and operations facility/job training center, traction power substations, and grade separation structures, as well as transit patron parking areas at selected locations along the project alignment. (Emphasis added)

The Notice of Preparation does not accurately describe the Project and alternatives analyzed in the Draft EIS/EIR.

⁶ <https://ceqanet opr.ca.gov/2017061007/2>

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- The Notice of Availability (NOA) for the Draft EIS/EIR appeared in the Federal Register⁷ on July 30, 2021, pursuant to NEPA, and identifying the comment period as ending on September 13, 2021.
- On July 30, 2021 Metro issued the Draft EIS/EIR for the Project which specified a comment period ending on September 28, 2021.⁸ The Draft EIR/EIS analyzed four Build Alternatives, two design options and two options for a maintenance and storage facility. The Draft EIS/EIR did not describe a proposed Project but did indicate that Alternative 3 was the “Staff Preferred Alternative.”⁹ The four build alternatives are shown in Figure S-2 from the DEIR reproduced below.

⁷ As cited in the FEIS/FEIR as: Federal Register. Vol. 86, No. 144, July 30, 2021.
See: <https://www.govinfo.gov/content/pkg/FR-2021-07-30/pdf/2021-16258.pdf>

⁸ The Draft EIR/EIS if available at: <https://ceqanet opr.ca.gov/2017061007/3>

⁹ See DEIS/DEIR page S-1

Figure S-2. WSAB Transit Corridor Build Alternatives



The staff preferred alternative (Alternative 3) is described in the DEIS/DEIR Executive Summary as running only from the Slauson/A Line (Blue) to Pioneer. Unlike Alternatives 1 and 2, which are 19.3 miles in length, it has only a 14.8 mile alignment (12.2 miles at grade; 2.6 miles aerial), with: 9 stations rather than 15 (3 aerial; 6 at-grade); 5 parking facilities with up to 2,795 spaces, 31 at-grade crossings; 15 elevated street crossings; 9 freight crossings; 4 freeway crossings (3 undercrossings at I-710, I-605, and SR-91); 3 river crossings; 17 TPSS facilities; 2

MSF site options; and \$4.9 billion - \$5.1 billion in capital cost.¹⁰ It therefore does not run from downtown LA as described in the NOPs and has less than the 15 stations.

- At its January 27, 2022 Board meeting, Metro took the following actions regarding the Project, according to the meeting minutes:¹¹

9. SUBJECT: WEST SANTA ANA BRANCH TRANSIT CORRIDOR PROJECT

APPROVED:

- A. the Los Angeles Union Station (LAUS) as the terminus for the 19.3-mile West Santa Ana Branch (WSAB) Projects; and**
- B. the Locally Preferred Alternative (LPA) as Slauson/A Line (Blue) to Pioneer Station with Maintenance and Storage Facility located in the City of Bellflower; and**
- C. accelerating the Slauson/A Line to LAUS segment before Measure M Expenditure Plan FY 41-43 by:**

¹⁰ See DEIS/DEIR Tables S.1 and S.2 and Figure S-2.

¹¹ The Board agenda and attachments, meeting video and meeting minutes are incorporated herein by reference and are available at: <https://boardagendas.metro.net/event/regular-board-meeting-c0d2ea668479/>
<https://metro.legistar.com/MeetingDetail.aspx?LEGID=2145&GID=557&G=A5FAA737-A54D-4A6C-B1E8-FF70F765FA94>
<https://metro.legistar.com/LegislationDetail.aspx?ID=5384346&GUID=83F75D8F-1CD3-4AF4-A46C-263EBEEE0189&G=A5FAA737-A54D-4A6C-B1E8-FF70F765FA94&Options=&Search=>

Minutes: <https://metro.legistar1.com/metro/attachments/092572c9-cc68-435f-963b-0377524e46d6.pdf>

Agenda: https://metro.legistar1.com/metro/meetings/2022/1/2145_A_Board_of_Directors_-_Regular_Board_Meeting_22-01-27_Agenda.pdf

<https://metro.legistar.com/LegislationDetail.aspx?ID=5384352&GUID=F92B1960-C53F-4226-95DD-3310CE4050D2&G=A5FAA737-A54D-4A6C-B1E8-FF70F765FA94&Options=&Search=>

Meeting Video: https://metro.granicus.com/player/clip/2077?view_id=2&redirect=true
See also approved Motion of January 19, 2022: <https://boardagendas.metro.net/board-report/2022-0023/>

- Identifying a cost-effective alignment route in lieu of the all-grade separated configuration currently assumed for the Slauson/A Line (Blue) to Union Station segment;
- Reengaging the community to best define a project, including alignment profile, station locations, and design, that meets the changing mobility needs of Little Tokyo, Arts District, LAUS and surrounding area residents, employees, and businesses;
- Preparing a separate environmental document for this segment; and

D. Identifying interim bus connections to connect Slauson/A Line to Union Station, as part of the Slauson/A Line to LAUS Segment study.

10. SUBJECT: WEST SANTA ANA BRANCH TRANSIT CORRIDOR PROJECT MOTION

APPROVED Motion by Directors Hahn, Solis, Garcetti, Mitchell, and Dutra that the Board adopt as policy that the full West Santa Ana Branch project will be declared complete once it provides a single-seat ride connecting the City of Artesia (Pioneer Boulevard) to Los Angeles Union Station via rail.

In order to ensure this full completion of the West Santa Ana Branch, WE FURTHER MOVE that the Board direct the CEO to:

- A. Identify and pursues accelerated construction of individual project components and accelerate funding for the locally preferred alternative including as part of the Transit Intercity Rail Capital Program (TIRCP) Cycle 5, in order to complete it sooner than FY33;
- B. Advance Value Capture and Public-Private Partnership work, including a Project Development Agreement opportunity, to accelerate and complete the line to Downtown LA:

- C. To mitigate the impacts of a Slauson Ave forced transfer on the existing light rail system with the initial operating segment's northern terminus at A Line (Blue) Slauson Station:
 - a. Coordinate with stakeholder agencies, including the City of Los Angeles Department of Transportation, the County of Los Angeles Department of Public Works, and the City of Vernon Public Works Department to develop and implement bus rapid transit service along the future final project alignment between Slauson Ave and Los Angeles Union Station, consistent with the Metro Board-approved Bus Rapid Transit Vision and Principles Study (March 2021);
 - b. Advance major capital improvements to the Washington/Flower Wye Junction countywide light rail bottleneck, based on a minimum funding target of \$330 million as defined by previous studies (July 2017) to be sought through new or future funding opportunities. As this project will support increased transit usage during major events, including the 2028 Olympic and Paralympic Games, as well as improved service reliability for daily transit users, Metro shall prioritize the project for the 2028-related funding opportunities, subject to consideration by the 2028 Olympic and Paralympic Games Mobility Executives group;
- D. As part of the additional study of the Slauson to Union Station segment, include the following:
 - a. Develop the Little Tokyo station and access, in collaboration with the Little Tokyo and surrounding communities;
 - b. An assessment of above-grade/aerial sections of the locally preferred alternative where cut-and-cover could be constructed at lower cost;
- E. Consistent with the LA River / Rio Hondo Confluence Station's ongoing feasibility study, include design elements in the Final

EIR for the locally preferred alternative that will reduce impacts to operations associated with future construction of this station;

- F. In partnership with community-based organizations, develop a local and targeted hiring policy and project labor agreement (PLA) for construction jobs and for permanent jobs to be created by the West Sant Ana Branch Project;
- G. Maintain the subregions' funding apportionments as provided under Measure M, with any consideration for borrowing across subregions subject to future Board action. Should it ever become necessary to consider the use of Central City Subregion funding for construction outside the Central City Subregion, the Central City subregion shall be made whole dollar-for-dollars; and,
- H. Report back to the Board in April 2022 with updates on all of the above items.¹²

The text of the full motion, included as an attachment to the April 28, 2022 Metro Board meeting, includes a preamble which states, in part:

The West Santa Ana Branch is the next major Measure M transit construction project set to advance to engineering and construction, with completion of the final environmental document anticipated in early 2023.

Once fully completed, this 19-mile light-rail line will provide a one-seat ride connecting the City of Artesia with Union Station in Downtown Los Angeles, traversing a dozen more cities along the way. Nearly the entire alignment runs through Metro-defined Equity-Focused Communities and the CalEnviroScreen's SB 535-defined "Disadvantaged Communities." (Emphasis added).

¹² The agenda for the April 28, 2022 Board Meeting including the text of the motion is available at: <https://boardagendas.metro.net/event/regular-board-meeting-d86bd1265bf2/> and: <https://metro.legistar.com/MeetingDetail.aspx?LEGID=2132&GID=557&G=A5FAA737-A54D-4A6C-B1E8-FF70F765FA94> and: <https://metro.legistar.com/LegislationDetail.aspx?ID=5566413&GUID=A7F5D547-0FF4-4880-9697-26BFD5AD0B64&G=A5FAA737-A54D-4A6C-B1E8-FF70F765FA94&Options=&Search=>

In selecting Alternative 3 as the LPA, the Board was presented with only the following written information: Attachment A – the Draft EIS/EIR Executive Summary; Attachment B – the Build Alternatives Map; Attachment C – Percent Minority Population; Attachment D – Percent Low – Income Population; and a presentation, which did not provide a comparison of either the environmental impacts of the alternatives, how the alternatives compared on the Travel Forecast Performance Measures, or the comparative costs of the alternatives.

In selecting Alternative 3, the Metro Board opted to split the Project into pieces, selecting the segment from Pioneer to Slauson/A Line for analysis in the FEIS/FEIR as the Locally Preferred Alternative (“LPA”) and delaying analysis of the segment from the Slauson/A Line to the selected terminus at LAUS. Metro thus defacto pre-committed to both the LPA to be analyzed in the FEIS/FEIR and to an ultimate terminus at LAUS, with that second segment to be analyzed at some future date. This precommitment is further demonstrated by the nature of the FEIS/FEIR and the fact that it addresses only the LPA for the segment from Pioneer to the Slauson/A Line and No Build Alternative.

- In March of 2024 Metro issued the FEIS/FEIR for the Project.¹³ As noted on FEIS/FEIR page 2-1, Metro did not identify the proposed Project, the Locally Preferred Alternative (“LPA”), until January of 2022, and made modifications to the proposed Project between issuance of the Draft EIS/DEIR (“DEIS/DEIR”) and FEIS/FEIR:

At its January 27, 2022, the Metro Board of Directors identified Alternative 3 from the Draft EIS/EIR as the LPA. The LPA extends from a northern terminus at the Slauson/A Line Station located in the City of Los Angeles/Florence-Firestone unincorporated area of LA County to a southern terminus at the Pioneer Station located in the City of Artesia for a total of 14.5 miles. The Metro Board also identified the MSF site option located in the City of Bellflower as a component of the LPA.

A range of possible alternatives that meets the Project’s purpose and need were evaluated and determined through the screening and project refinement process as part of the Draft EIS/EIR process (see

¹³ The Final EIS/EIR is available at: <https://www.metro.net/projects/southeastgateway/#status>

Section 2.4.1). The Draft EIS/EIR identified and evaluated four Build Alternatives (Alternatives 1, 2, 3, and 4) based on a criteria selection process, potential issues for each alternative, and input from interested parties, stakeholders, and communities. Alternative 3 was identified as the “staff preferred alternative” in the Draft EIS/EIR. Alternative 3 from the Draft EIS/EIR has been identified as the LPA. **This Final EIS/EIR analyzes the refinements to Alternative 3 that were developed in response to coordination with stakeholders, including public agencies, and comments received during the Draft EIS/EIR comment period.** These refinements are summarized in Section 2.4.3.2 and in Appendix E. A **No Build Alternative is also included for comparison purposes.** **For CEQA purposes, the discussion and analysis of Alternatives 1, 2, and 4, including design options, and the Paramount MSF set forth in the West Santa Ana Branch Transit Corridor Project Draft Environmental Impact Statement/Environmental Impact Report (Metro 2021a) are hereby incorporated by reference.** The LPA includes one design option, (Close 186th Street), which was identified in coordination with stakeholders after circulation of the Draft EIS/EIR. The design option is described in Section 2.5.2.3.

The FEIS/FEIR thus analyzes a modified version of Alternative 3 (the LPA) with some discussion of the No Build Alternative. The analysis of the other alternatives is only incorporated by reference. Chapter 6: Evaluation of Alternatives in the FEIS/FEIR is only 12 pages long and provides only a one-page summary of each of the alternatives and their environmental consequences. The FEIS/FEIR is thus designed to ensure selection of the LPA, which represents only a portion of the specified Project, and fails to provide Metro decision-makers with adequate information about the other alternatives.

In selecting modified Alternative 3, which runs for a total of 14.5 miles from a southern terminus at the Pioneer Station located in the City of Artesia to a northern terminus at the Slauson/A Line Station located in the City of Los Angeles/Florence-Firestone unincorporated area of LA County, the Metro Board opted to engage in project segmentation, also known as piecemealing. It is clear that the whole of the action/project intended by Metro includes Los Angeles Union Station (“LAUS”) as the terminus for a 19.3-mile, rather than 14.5 mile West Santa Ana Branch

(“WSAB”) Project. However, Metro has now split the Slauson/A Line to Union Station portion of the Project off. As noted on the Metro website, Metro has now renamed the LPA as the Southeast Gateway Line.¹⁴ It is now described on the Metro website as “part of the West Santa ana Branch Transit Corridor project (WSAB), with Metro separately studying the remainder of the line:¹⁵

Slauson/A Line to Union Station Study

Staff are conducting a separate study to evaluate options for connecting from Slauson/A Line to Union Station. The next step of the study includes preparing the Draft report, additional stakeholder engagement and presenting study findings to the Metro Board in 2024.

- In early April, our client received a letter from Metro dated March 29, 2024 informing our client of the availability of the FEIS/FEIR and the fact that our client’s property would be impacted by the Project. The letter set a deadline of April 29, 2024 for submittal of comments that would be included in the FTA’s Record of Decision for the FEIS. It also indicated that the Metro Board will consider certifying the Final EIR at a meeting in the coming months.

III. REVISIONS TO ALTERNATIVE 3 – THE LPA.

The changes to the newly-designated LPA made between the Draft and Final EIS/EIR are explained more fully in FEIS/FEIR Section 2.4.3.2:

¹⁴ <https://thesource.metro.net/2023/08/21/were-renaming-our-west-santa-ana-branch-transit-corridor-wsab-project-and-we-want-your-help/>

The West Santa Ana Branch Transit Corridor (WSAB) project is a new light rail transit (LRT) line that will connect southeast LA County to Downtown Los Angeles. With nine new stations, the 14.5-mile segment will transform the way people move across the Gateway Cities and Southeast Los Angeles, connecting Artesia, Cerritos, Bellflower, Paramount, Downey, South Gate, Cudahy, Bell, Huntington Park, Vernon, unincorporated Florence-Firestone and Downtown LA.

¹⁵ <https://www.metro.net/projects/southeastgateway/#documents>

The LPA evaluated in this Final EIS/EIR is Alternative 3 from the Draft EIS/EIR with refinements to address stakeholder coordination and comments on the Draft EIS/EIR. The following summarizes the refinements to the LPA, construction laydown/staging areas, traction power substation (TPSS) sites, identification of a new design option, and the MSF. See Appendix E, Project Refinements since Circulation of the Draft EIS/EIR, for additional details of the refinements to the LPA.

Refinements to the Locally Preferred Alternative

- Shift the Slauson/A Line aerial station platform south and add a second set of vertical circulation and pedestrian circulation elements between the Slauson/A Line Station and the existing A Line Station. Additionally, a set of stairs was added between the existing A Line station and street level (Unincorporated LA County).
- Swap the location of the freight and LRT tracks within the La Habra Branch right-of-way (ROW) compared to the Draft EIS/EIR design. Freight tracks will be located on the north side of the ROW and LRT tracks on the south side to accommodate potential freight connectivity to an existing industrial track on the north side of the ROW (Unincorporated LA County and City of Huntington Park).
- Open or close at-grade crossings and implement left-turn restrictions over the LRT tracks in the City of Huntington Park:
 - Open crossings previously proposed for closure at Albany Street and Rugby Boulevard
 - Close crossings previously proposed to remain open at Malabar Street and Arbutus Avenue
 - Implement left-turn restrictions at Santa Fe Avenue, Pacific Boulevard, Miles Avenue, and State Street

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- Modify roadway design at the southeast corner of Florence Avenue and California Avenue to avoid partial acquisition of infrastructure related to a water well (City of Huntington Park).
- Redesign a freight spur track connection north of Rayo Avenue on the west side of the freight tracks to avoid impacts to a spur track (City of South Gate).
- Close the private at-grade crossing at Miller Way (City of South Gate).
- Extend the LRT viaduct north of Imperial Highway to avoid impacts to a spur track and full acquisition of a property (City of South Gate).
- Reconfigure the I-105/C Line Station parking facility by removing dedicated transit parking on the west side of the freight tracks and expanding the parking facility on the east side of the freight tracks to the north; also add a new driveway entrance to the parking facility at Century Boulevard (City of South Gate).
- Eliminate demolition and reconstruction of the Arthur Avenue and Façade Avenue bridges; modify Façade Avenue to an emergency exit only from the I-105/C Line infill station (rather than a station entrance and exit) (City of Paramount).
- Modify the replacement freight bridge at I-105 to a four-span structure, consistent with the current bridge, rather than the previously proposed two-span structure.
- Replace the proposed pedestrian undercrossing with a pedestrian bridge at Paramount High School that will span the entire rail ROW (City of Paramount).
- Add a protected left turn and a traffic signal on Clark Avenue at Los Angeles Street to accommodate dedicated turning movements to the community (City of Bellflower).

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- Modify alignment of the LRT tracks and soundwall at the Bellflower Mobile Home Park to minimize parking loss and provide replacement parking elsewhere on the property to maintain the existing number of parking spaces (City of Bellflower).
- Redesign retaining walls on the southeast side of the 183rd Street/Gridley Road crossing from retained fill to columns (City of Artesia).
- Incorporate the Artesia Historic District Recreation Trails as an existing, rather than future, condition in the Final EIS/EIR plan set (City of Artesia).
- Modify the entrance to the Pioneer Station parking structure to align with Solana Place and shift structure north to provide alley egress resulting in an additional level on the Pioneer parking structure to maintain the number of parking spaces identified in the Draft EIS/EIR (City of Artesia).
- Extend the median located north of the LRT tracks at the Pioneer Boulevard grade crossing to prohibit left turns from a shopping center driveway along the east side (City of Artesia).
- Incorporate Mitigation Measures NOI-4 (Crossing Signal Bell Shrouds) and NOI-5 (Gate-Down-Bell-Stop Variance)—recommended in the Draft EIS/EIR to further reduce noise at grade crossings—as Project Measures NOI PM-1 and NOI PM-2 in the Final EIS/EIR to be implemented as part of the LPA. These measures are described in Chapter 4, Section 4.7.4.1, Noise and Vibration, of this Final EIS/EIR.
- Add Project Measure VA PM-8 (Residential Screening for Aerial Structures), which requires privacy screening along portions of the aerial structure adjacent to the rear of residential properties in the Cities of Paramount, Bellflower, and Cerritos if the soundwall in those locations will not be sufficiently tall to provide similar privacy screening. This measure is described in

Chapter 4, Section 4.4.4.1, Visual and Aesthetics, of this Final EIS/EIR.

- Add Project Measures BIO PM-1 (Invasive Plant Species Best Management Practices) and BIO PM-2 (Prohibition of Invasive Plant Species in Landscape Plans) to provide options to minimize the spread of invasive species during construction and prohibit the inclusion of invasive species in landscape plans; add Project Measure BIO PM-3 (LA Metro Tree Policy) to require adherence to LA Metro Tree Policy, adopted by Metro in October 2022. These measures are described in Chapter 4, Section 4.19.3.8 (Construction-related Ecosystems/Biological Resources Section) of this Final EIS/EIR.
- Add Project Measure CR PM-1 (Secretary of the Interior Standards Design Review), which requires review and approval of the design of the new LRT bridge and C Line station that will be constructed within the Century Freeway-Transitway Historic District and extension of the Union Pacific LA River Rail Bridge's existing concrete piers by a professional who meets the Secretary of the Interior's Professional Qualification Standards in architectural history, history, or architecture; the measure is described in Chapter 4, Section 4.14.4 (Historic, Archaeological, and Paleontological Section) of this Final EIS/EIR.

Construction Laydown/Staging Areas

- Relocate the construction laydown area near State Street and Randolph Street to east of State Street in the railroad ROW (City of Huntington Park).
- Relocate the laydown area at the southeast corner of Imperial Highway and Garfield Place to north of Imperial Highway within the San Pedro Subdivision ROW (City of South Gate).
- Locate a construction laydown/staging area on the east side of the ROW between Rayo Avenue and Southern Avenue (City of South Gate).

Traction Power Substations Site Locations

- Relocate TPSS Site 14 from the northwest corner of Randolph Street and State Street to the east within railroad ROW (City of Huntington Park).
- Eliminate optional TPSS Sites 16E and 12E (City of Huntington Park).
- Add Optional TPSS Site 7E within the reconfigured parking facility east of the tracks at the I-105/C Line Station parking facility (City of South Gate).
- Relocate the proposed TPSS Site 2 from the northwest side of the intersection of 183rd Street/Gridley Road to the southeast side (City of Cerritos and City of Artesia).

Design Option

- Add a design option that would close 186th Street but keep 187th Street open to traffic and turn Corby Avenue into a cul-de-sac with an access driveway for the existing business (City of Artesia).

Maintenance and Storage Facility

- Realign the MSF site entrance on Somerset Boulevard to align with Bayou Avenue to allow for a signalized pedestrian crossing of Somerset Boulevard (City of Bellflower).

FEIS/FEIR Appendix E: Project Refinements Since Circulation of the Draft EIS/EIR, further details the modifications to Alternative 3 in defining the LPA. That appendix is incorporated herein by reference and is available as part of the FEIS/FEIR on the Metro website previously footnoted.

The version of the now identified LPA analyzed in the FEIR has thus been changed in a number of significant ways, from the version of Alternative 3 analyzed in the DEIS/DEIR. While some of the modifications to Alternative 3

were in response to comments, as summarized in FEIS/FEIR Table 2.1, not all of the changes are driven by comments, and Table 2-1 fails to provide an explanation for all of the changes:

Table 2.1. Summary of Project Refinements from the November 2018 Metro Board Meeting

Project Refinement	Reason for Refinement
Elimination of Washington Station and Vernon Station	<ul style="list-style-type: none"> Low projected ridership at these stations, and duplicative service into downtown LA from the Metro A (Blue) Line Eliminating the stations would improve travel time along the WSAB alignment
Elimination of 183rd/Gridley Station	<ul style="list-style-type: none"> Lack of community support, limited ridership potential, and proximity to the Pioneer Station in the City of Artesia
Elimination of Optional Bloomfield Station Extension	<ul style="list-style-type: none"> Lack of support from stakeholders for a future extension into Orange County
Elimination of Pershing Square Terminus Station Design Option	<ul style="list-style-type: none"> Provided less connectivity to the regional transit network; produced worse ridership and smaller reductions in vehicle miles traveled; impacted more historic properties; less light rail transit level-of-service compared to 7th St/Metro Center Station; and fewer passenger transfers from the Metro A (Blue) Line to the WSAB Line compared to the 7th St/Metro Center Station
Additional Grade Separations <ul style="list-style-type: none"> Firestone Blvd Imperial Highway/Garfield Ave Downey Ave Woodruff Ave/Flower St 183rd St/Gridley Rd 	<ul style="list-style-type: none"> Additional grade separations, based on Metro's Grade Crossing Safety Policy for Light Rail Transit (Metro 2010a), were included. The key factors included traffic volumes, train frequency, safety considerations, and a variety of special circumstances (e.g., vertical engineering alignment considerations, effects on traffic operations, pedestrian activity, and adjacent land uses)
At-grade profile under the I-10 freeway changed to aerial grade-separated over I-10 freeway	<ul style="list-style-type: none"> Potential to result in traffic impacts to 15th St and 16th St

Source: Metro Board Report, November 14, 2018; File #2018-0404, Agenda Number:15, Attachment A.

In addition to the changes to the proposed Project identified in the FEIS/FEIR, the FEIR/FEIR indicates that additional changes have been requested and are anticipated to the rail line for this corridor. As noted on FEIS/FEIR page 2-18:

During the January 2022 meeting, the Metro Board also identified LAUS as the ultimate terminus for the corridor. By direction of the Metro Board of Directors and motion by Directors Hahn, Solis, Garcetti, Mitchell, and Dutra (File #2022-0023), Metro staff were directed to identify and evaluate a more cost- effective alignment between the Slauson/A Line Station and LAUS in light of the funding gap, and to re- engage the community to best define a transit solution, including alignment profile, station locations, and design, that meets the changing mobility needs of Little Tokyo, the Arts District, LAUS, and surrounding area residents, employees, and businesses. In response to the Board Motion, a standalone study, the

West Santa Ana Branch Transit Corridor Project Slauson/A Line to LA Union Station Segment Study, is underway. This standalone study does not include discussion of the LPA. While Alternatives 1 and 2 identified in the Draft EIS/EIR remain under consideration, modifications to those alternatives made in response to the standalone study, or as a result of design refinements, would be the subject of a future environmental document.

These changes represent more than a minor variation in Alternative 3 as discussed in the DEIS/DEIR. As documented further below in this letter, these changes are relevant to the environmental concerns and the specific location of impacts.

IV. LACK OF AN ACCURATE, STABLE OR FINITE PROJECT DESCRIPTION.

As detailed in Section I - III of this letter, the Draft EIS/EIR failed to identify a LPA and instead analyzed four build alternatives. All four alternatives were addressed in the Impact Summary Tables S2 through S5 of the DEIS/DEIR. Although Alternative 3 was identified as the “staff preferred alternative” in the DEIS/DEIR, this alternative was not formally designated by Metro as the LPA or as the proposed Project until January of 2022. Metro thus designated Alternative 3 as the LPA subsequent to the release of the DEIS/DEIR, and then proceeded to modify it in a number of significant ways as detailed in Section II of this letter. The version of Alternative 3 analyzed in the FEIS/FEIR as the LPA is not the same as Alternative 3 as described in the DEIS/DEIR. In addition, it appears that Metro anticipates additional changes. The project as described in the NOPs, the DEIS/DEIR and FEIS/FEIR has thus not proved to be accurate, stable or finite.

When it comes to CEQA documents, the courts have held that an accurate, stable and finite project description is fundamental to a legally sufficient EIR. This was first explained in *County of Inyo* (1977) 71 Cal.App.3d 185, 192-193, 198:

An accurate, stable and finite project description is the *sine qua non* of an informative and legally sufficient EIR.

A curtailed, enigmatic or unstable project description draws a red herring across the path of public input.

As further explained by the courts:

This court is among the many which have recognized that a project description that gives conflicting signals to decision makers and the public about the nature and scope of the project is fundamentally inadequate and misleading. [Citation.] ‘Only through an accurate view of the project may affected outsiders and public decision-makers balance the proposal’s benefit against its environmental cost, consider mitigation measures, assess the advantage of terminating the proposal i.e., the “no project” alternative[], and weigh other alternatives in the balance.’ [Citation.]¹⁶

“[W]hen an EIR contains unstable or shifting descriptions of the project, meaningful public participation is stultified.”¹⁷

A project description that omits, or allows modification of, significant integral components of the project will result in an EIR that fails to disclose the actual impacts of the project.¹⁸

The description of the proposed Project reflected in the NOPs and EIR/EIS has not proved accurate, stable or finite. Metro has made significant changes to the Project since issuance of the DEIR/DEIS for the Project. This is unacceptable under CEQA.

V. FAILURE TO IDENTIFY SIGNIFICANT IMPACTS AND NEW OR GREATER LPA IMPACTS

A. Taking-Related Impacts.

The DEIS/DEIR and FEIR/FEIS fail to provide an accurate assessment of taking-related impacts of the Project and LPA. As shown in Table 5.2 of the Final Displacements and Acquisitions Impact Analysis Report included as an FEIS/FEIR Technical Report, the LPA will impact 206 parcels and result in 50 full acquisitions and 199 partial acquisitions:

¹⁶ *Citizens for a Sustainable Treasure Island v. City and County of San Francisco* (2014) 227 Cal.App.4th 1036, at p. 1052.

¹⁷ *San Joaquin Raptor Rescue Center v. County of Merced* (2007) 149 Cal.App.4th 645, 656.

¹⁸ *Santiago County Water District v. County of Orange* (1981) 118 Cal App 3d 818.

Table 5.2. Summary of Permanent Property Acquisitions

	Affected Parcels ¹	Full Acquisitions	Partial Acquisitions	Parcel Affected Area (sq ft) ²
Locally Preferred Alternative	204	48	199	1,262,500
MSF Site	2	2	0	939,700
LPA + MSF Total	206	50	199	2,202,200
Design Option ³	0	0	0	0

Source: DRA 2023; WSP 2023; TAHA 2023

Notes: The table accounts for full permanent acquisitions of parcels that will be used for construction staging areas. At the conclusion of construction, construction staging areas will be used for station parking facilities and the MSF site. 22 parcels will be converted to station parking facilities and the MSF site.

¹ Parcels are identified by parcel boundaries and APN. "Affected Parcels" is not a total sum of the permanent full and partial acquisitions. More than one permanent partial acquisition may occur on a single parcel and each permanent partial acquisition is counted.

² Parcel Affected Area rounded to nearest hundred.

³ With the implementation of the design option, the LPA with the design option will net one less permanent impact compared to the LPA without the design option.

MSF = maintenance and storage facility; sq ft = square feet

As explained on page 5-2 of that Technical Report:

Partial Acquisition. Partial property acquisitions mean that only a portion of the property will be purchased, and the owner will retain the remaining portion of the property. Metro may purchase a fee or permanent easement interest for the portion of the property and will become owner for that portion of the property rights. A partial acquisition is also considered if the area required for the LPA is not critical to the property's primary function as a residence or business, or if the remaining portion of the property could be reconfigured to continue serving its purpose without significant disruption to occupants. Partial property acquisitions may result from the widening of street or intersections due to inadequate ROW widths, track encroachment onto private property, or area required for ancillary facilities and TPSS sites.

As noted on page 5-5 of the Technical Report:

5.2.3.1 Business Displacements

Nonresidential displacements will occur to accommodate LPA components, including aerial structures, stations, TPSS sites, and grade crossings. Property displacements are determined by evaluating the extent to which the LPA will affect existing properties and identifying those properties where the current use will not be possible if the LPA is constructed. Direct effects on structures,

assessment of property-specific elements (e.g., available parking, access to and traffic circulation within the property, and other aspects specific to the type of business affected), and effects that may disrupt a business' ability to conduct their primary function after project implementation were evaluated. Businesses affected include automotive services, commercial retail, industrial/manufacturing, plant nursery, office, hotel, and restaurants. Business and employment displacements will not occur in the Cities of Vernon and Downey, and in the unincorporated LA County community of Florence-Firestone.

Table 5.4 summarizes the number of potential businesses and employees that will be displaced by the Project in each jurisdiction. The LPA will displace approximately 58 businesses and approximately 368 employees. The LPA and the MSF in total will displace approximately 59 businesses and approximately 443 employees.⁷ Refer to Appendix A for parcel-specific data.

The FEIS/FEIR concluded that because there are a sufficient number of replacement sites available within 6 miles of the affected locations for the businesses identified as needing relocation and because Metro will provide relocation assistance and compensation for identified eligible displaced businesses and residences as required under the Uniform Act and California Relocation Act, that impacts are less than significant. However, the Uniform Act and California Relocation Act do not provide for severance damages or compensation for loss of business goodwill. Impacts have therefore been underestimated and remain significant and should be acknowledged as such.

The conclusion that there are adequate relocation sites available does not appear to have considered the County's Metro Area Plan ("MAP") which is designed to foster additional residential development on sites in proximity to transit, including sites historically considered industrial.¹⁹ The FEIS/FEIR may therefore overestimate business relocation potential and thus underestimate employment and business impacts of the LPA.

¹⁹ <https://planning.lacounty.gov/long-range-planning/metro-area-plan/documents/>

In addition, the FEIS/FEIR fails to adequately recognize that even minor takings can have major impacts on a business's viability and on the cost to mitigate the taking. The full costs to businesses may not be fully captured in the purchase price, particularly for partial acquisitions. Our client's business provides a good example of this and of the fact that impacts have increased for some properties under the LPA, as opposed to the alternatives analyzed in the DEIS/DEIR and Appendix H to the DEIS/DEIR.

In the DEIS/DEIR, our client's property at the corner of Slauson and Long Beach Avenue/Randolf Street would experience the following takings according to Appendix A of DEIS/DEIR Appendix H:

WSAB Parcel	Drawing Num	Section	APN	City	Alignment	Type	ROW Type	Take Type	Impact SQFT	Site TPPS	Facility Name	Relocation
WSAB-617	R-1-127	Southern	6009-002-025	Florence	1, 2, 3	Column	Fee Area	Part	86.49	N/A	N/A	No
WSAB-617	R-1-127	Southern	6009-002-025	Florence	1, 2, 3	Construction Laydown	Fee Area	Part	759.08	Potential Laydown Area 41	N/A	No
WSAB-617	R-1-127	Southern	6009-002-025	Florence	1, 2, 3	Construction Easement	TCE	TCE	23.30	N/A	N/A	No

Under the LPA, both the nature and location of the taking would change, as shown on pages A-2 and A3 of Table 1 of the FEIS/FEIR Final Displacement and Acquisitions Impact Analysis Report pages A-2 and A-3:

Table 1. Property Acquisitions and Displacements for the Locally Preferred Alternative

WSAB Parcel Number	Drawing Number	City	APN	Impact Type	ROW Type	Acquisition Type	Impact Area (sq ft)	Site TPPS	Facility Name	Relocation
WSAB-616	R-1-101	Florence	6009-002-012	Aerial	Permanent Aerial Easement	Part	148.58	N/A	N/A	No
WSAB-617	R-1-101	Florence	6009-002-025	Column	Fee Area	Part	59.10	N/A	N/A	No
WSAB-618	R-1-101	Florence	6009-002-012	Column	Fee Area	Part	18.21	N/A	N/A	No
WSAB-615	R-1-101	Florence	6009-002-025	Aerial	Permanent Aerial Easement	Part	943.71	N/A	N/A	No

Under the LPA, our client's building would be impacted by the location of the LPA columns and the property would be impacted by two, rather than one column. **Figure 1** shows the location of the takings in relations to our client's building:

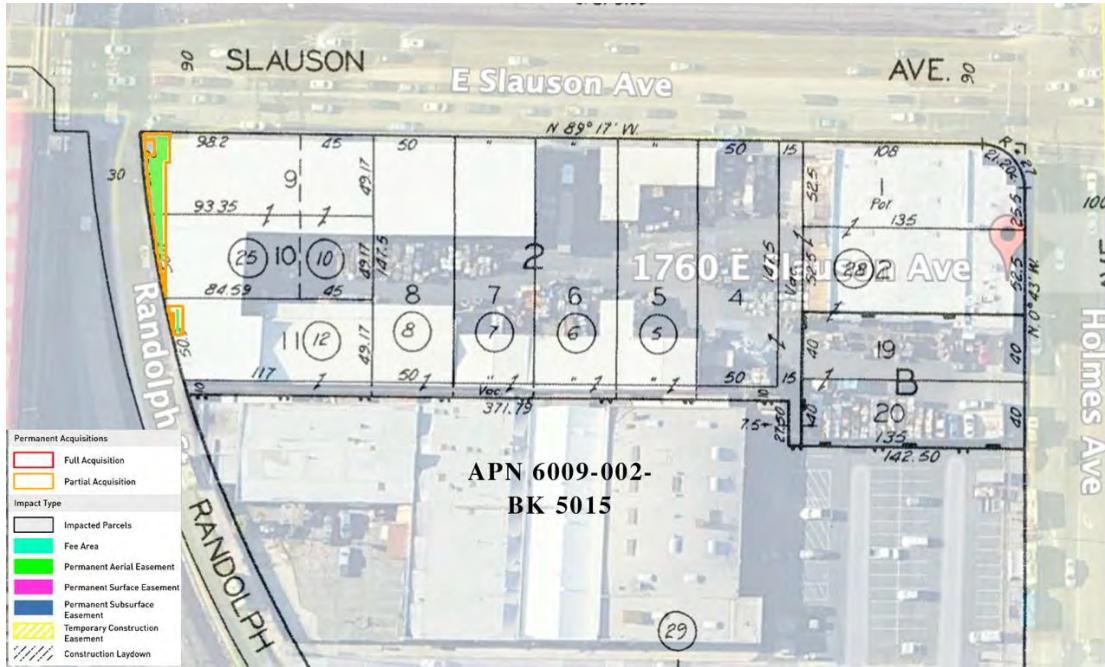
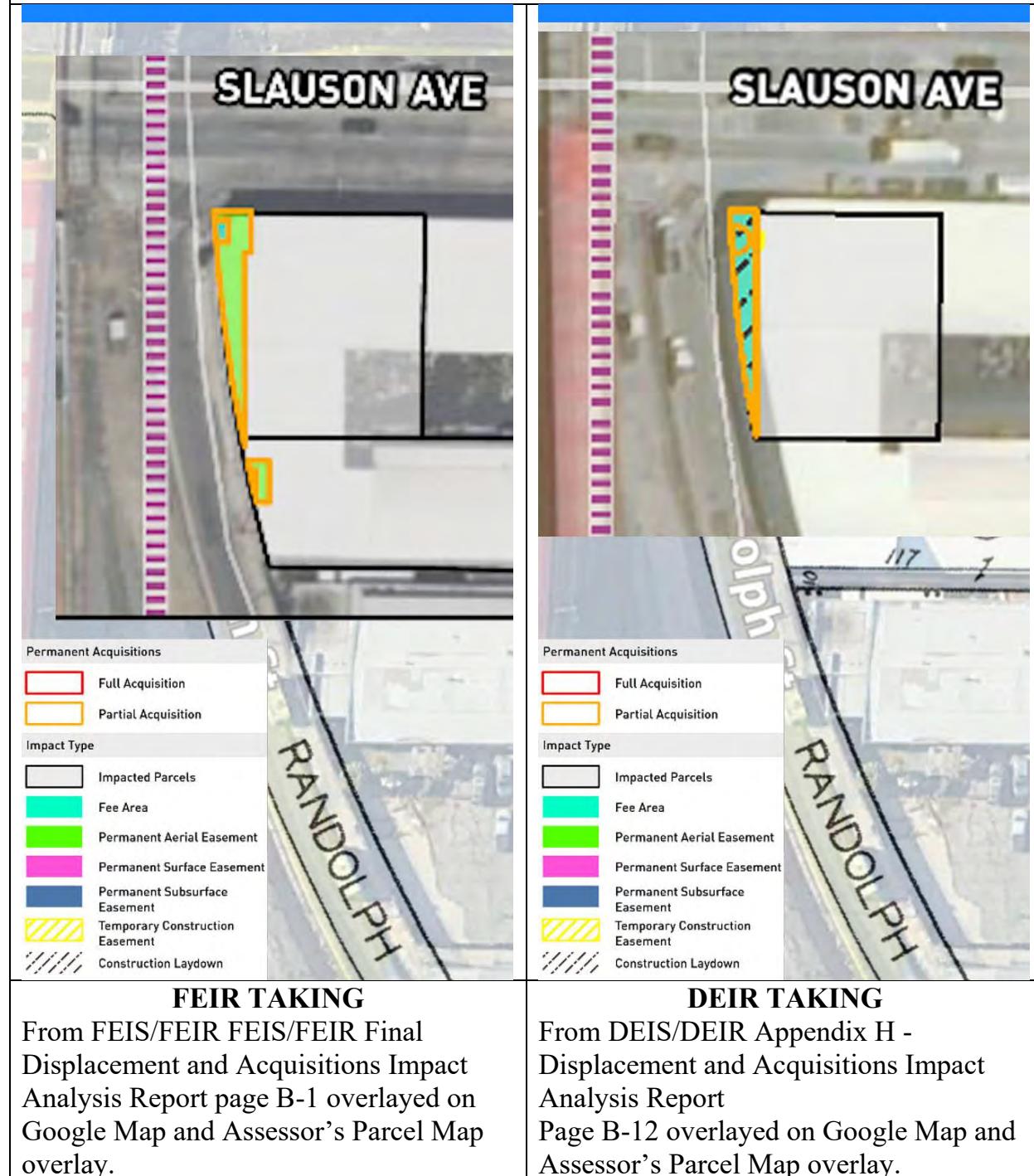


FIGURE 1: LOCATION OF TAKINGS IN RELATION TO CLIENT'S BUILDING AND BUSINESS UNDER THE LPA

Source: Google Earth, Assessor's Parcel Info, and Figure from page B-1 of the FEIS/FEIR Final Displacement and Acquisitions Impact Analysis Report

Figure 2 shows that the location of both the analyzed alignment and the impact on our client's business have changed between the DEIS/DEIR and the FEIS/FEIR. The alignment and station have been moved east, closer to our client's business and the two proposed columns now appear to pierce the building envelope of our client's business in locations where there are massive, expensive critical machines and other critical infrastructure – which we question if Metro and the FTA are aware of – and which would be extremely difficult and expensive to relocate, if that would even be possible.

FIGURE 2
COMPARISON OF IMPACT TO PROPERTY
FEIR TAKING VS DEIR TAKING



While it is not possible to discern from the figures provided in the FEIS/FEIR the exact location of the proposed columns, it appears certain that columns would go in and through the west side of the building where there is incredibly expensive equipment and other critical infrastructure. Specifically, this includes an underground vault, a conveyor belt, and a giant metal bailing machine that turns scrap metal into bales.



FIGURE 3: CONVEYOR BELT FOR COPPER SCRAP, GOING UP THE CONVEYOR BELT RAMP, BEHIND WHICH IS THE BAILING MACHINE

The metal bailing machine in this area is used exclusively for copper, as metals cannot share the same machine because they would cross-contaminate. All of this is located towards the northwest corner of the building, where it appears at least one column will go. Also, with a column in that approximate location, it will interfere with the processing and sorting by workers. That general area also is where Kramer moves the scrap by tractor, pushing it onto the conveyor belt. So even if the column wouldn't force the movement of the vault, conveyor belt, and bailing machine, it would interfere with

the required processing and movement area to be able to properly and safely run a significant portion of the business.

In addition, there is a large underground water filtration system that Kramer installed. This is a state of the art, environmental system. The columns would probably interfere with that subterranean infrastructure. In turn, that would be extraordinarily expensive to relocate, or, if it could not be relocated because of space or other constraints, this would force upon Kramer significant regulatory fees, approvals, and other complications.



FIGURE 4: TO THE RIGHT OF THE TRACTOR IS THE CONVEYOR BELT; THE RECTANGLE AROUND IS WHERE THE UNDERGROUND VAULT IS LOCATED.

It also appears that the westerly wall of the building would be interfered with. This area contains electrical boxes, conduit, and other equipment.

The location of the columns as currently planned would cause severe and irreparable damage to the business, including causing loss of business goodwill, by interfering with:

1. Massive built-in fixtures and equipment including subterranean vault, conveyor belt, and bailing machine;
2. An underground water retention and filtration system;
3. Other electrical and related infrastructure.

The columns would also likely impair the ability to freely move across that general floor area by compressing the available work area for movement of tractors and personnel. The LPA would thus threaten the continued viability of the business, yet the FEIS/FEIR identifies only a partial acquisition and no mitigation plans for this business. In addition, the aerial easement for the proposed station, over a portion of our client's site, would further adversely impact the site. These impacts were not adequately disclosed, analyzed or mitigated.

This demonstrates both that identification of a partial take does not capture the impact of the take on the operation of businesses, including Kramer's, that the population and employment analyses underestimate impacts, and that the LPA results in new and different impacts than analyzed in the DEIS/DEIR. The analyses must therefore be redone to capture the full impact of both the full and partial takes on businesses and industrial operations along the alignment.

B. Change in Noise Impacts Due To Changes to the LPA.

Between the DEIS/DEIR and the FEIS/FEIR significant changes were made to the noise methodology used to analyze operational noise impacts of modified Alternative 3 (the LPA). As explained on FEIS/FEIR page 4-234 as part of the discussion of LPA pass-by noise impacts:

As noted previously, since completion of the Draft EIS/EIR, changes to the noise methodology, analysis, and mitigation design were made in response to comments received regarding community concerns for residual operational noise impacts after mitigation (refer

to Section 4.7 for a summary of the changes). The number of clusters also changed to remove clusters that no longer have noise-sensitive uses or add clusters as a result of modeling refinements or in response to comments on the Draft EIS/EIR. With these updates, 308 Category 2 clusters and 26 Category 3 clusters are included in the analysis. The LPA will result in 94 moderate impacts and 117 severe impacts at Category 2 clusters. Three Category 3 clusters will experience moderate impacts. In total, the LPA will result in 97 moderate impacts and 117 severe impacts.

The following Table summarizes the differences in LRT pass-by noise impacts identified for DEIS/DEIR Alternative 3 and the modified LPA version of Alternative 3 in the FEIS/FEIR. The table serves to show that the nature of impacts has changed, as have the number and location of study clusters.

COMPARISON OF LRT PASS-BY NOISE IMPACT DEIS/DEIR vs FEIS/FEIR			
	Number of Clusters Impacted		
FTA Land Use Category	Moderate	Severe	Total
DEIR			
Category 2	59/289	153/289	212/289
Category 3	10/26	2/26	12/26
DEIR Total	69	155	224/315
FEIR			
Category 2	94/308	117/308	211/308
Category 3	3/26	0/26	4/26
FEIR Total	97	117	214/334

COMPARISON OF LRT PASS-BY NOISE IMPACT DEIS/DEIR vs FEIS/FEIR

Source: FEIS/FEIR Table 4.7.3 and FEIR page 4-234

Notes: 1 Cluster sites (groups of sensitive land uses) are shown in the Noise and Vibration Impact Analysis Report.

2 Category 1 – Land where quiet is an essential element of its intended purpose (e.g., recording studios). Category 2 – Residences and buildings where people normally sleep; nighttime sensitivity (e.g., hospitals, hotels). Category 3 – Institutional land uses; primarily daytime use that depend on quiet as an important part of operations (e.g., schools, libraries, and churches).

FTA = Federal Transit Administration; LPA = Locally Preferred Alternative; LRT = light rail transit.

As further explained in FEIS/FEIR pages 4-223 to 4-224, not only was the noise methodology altered, but new study locations were added and some study locations were removed, mitigation measures were modified, and mitigation measures were converted to design features to reduce pre-mitigation impacts, as follows:

Since completion of the Draft EIS/EIR, changes have been incorporated into the noise and vibration methodology and analysis. A detailed list of the methodology changes is included in Section 1.6 of the Noise and Vibration Impact Analysis Report. Modeling was updated to reflect refinements to the LPA, such as swapping the location of the LRT and freight tracks within the La Habra Branch, opening previously closed at-grade crossings, and closing previously open at-grade crossings. Mitigation Measures NOI-1 (Soundwalls) through NOI-5 (Freight Track Relocation Soundwalls) were updated as applicable. The changes also include removal of clusters that no longer have noise-sensitive uses, addition of noise clusters as a result of modeling refinements (i.e., the division of previously analyzed clusters to add more specificity to the analysis) or as a result of comments received on the Draft EIS/EIR, which identified newly constructed residential uses, updated operational information such as using operational speeds instead of design speeds, and refined design of soundwalls at at-grade crossings and taller soundwall heights at locations along the LPA. The soundwall design at at-grade crossings was refined to bring the edge of the soundwall to the pedestrian crossing to minimize the gap in the soundwall and increase noise-reduction benefits. Maximum soundwall heights considered in the Draft EIS/EIR were 4 feet for soundwalls on the aerial structure and

8 feet for soundwalls at-grade. The maximum soundwall heights considered for the LPA are 12 feet on the aerial structure and 16 feet at-grade.

The modeling refinements and increased soundwall heights were made in response to comments received regarding community concerns for residual noise impacts after implementation of mitigation identified in the Draft EIS/EIR. The audible warnings noise now assumes the minimum allowable bell noise level of 75 dBA, Lmax at 10 feet, crossing signal bell shrouds, and a gate-down-bell-stop variance at crossings located near sensitive receivers. The measures are listed as Project Measure NOI PM-1 (Crossing Signal Bells) and NOI PM-2 (Gate-Down-Bell-Stop-Variance), which were included in the Draft EIS/EIR as Mitigation Measures NOI-4 and NOI-5 and would be equivalent to the mitigation measures included in the Draft EIS/EIR. The two mitigation measures were incorporated as project measures as a result of coordination with CPUC, which confirmed that they were feasible and are anticipated to be approved by CPUC. The two project measures will be installed at at-grade crossings with adjacent residential sensitive receptors once CPUC approval is obtained. Obtaining approval requires demonstrating to the CPUC that the safety measures in place at the crossing more than compensate for stopping the bell noise once the gates are in the horizontal position. Based on experience on previous Metro projects and input from CPUC, Project Measures NOI PM-1 (Crossing Signal Bells) and NOI PM-2 (Gate-Down-Bell-Stop-Variance) are anticipated to be approved and implemented.

Additional vibration analysis was completed for the Dante Valve Company and a water utility in the City of Bellflower in response to comments on the Draft EIS/EIR and one newly constructed residential building in the City of South Gate, and operational information was updated consistent with the noise analysis.

Overall, the refinements in noise modeling, including implementation of Project Measures NOI PM-1 (Crossing Signal Bells) and NOI PM-2 (Gate-Down-Bell-Stop-Variance) and

refinements of the soundwall heights and locations, have reduced the number of residual impacts compared to the Alternative 3 residual impacts presented in the Draft EIS/EIR from 101 moderate impacts to 31 moderate impacts and from 59 severe impacts to 4 severe impacts for LRT noise without the design option. The LPA with design option would result in 33 moderate impacts and 2 severe impacts remaining. Regarding the sensitive uses affected by the combination of LRT noise with freight noise, the number of residual impacts compared to Alternative 3 will be reduced from 37 moderate impacts to 31 moderate impacts and 11 severe impacts to 1 severe impact.

Given the nature of the information in the DEIS/DEIR and the FEIS/FEIR, it is not possible to compare the location of impacted clusters to determine if the impacted clusters are the same or different.²⁰ The FEIS/FEIR fails to provide sufficient information to support a conclusion that project refinements do not result in new or more severe impacts at locations along the revised alignment. In addition, the FEIS/FEIR fails to consider noise and vibration impacts to potential future residential developments, especially in light of the County’s Metro Area Plan (“MAP”), which is designed to foster additional residential development on sites in proximity to transit, including sites historically considered industrial. (See discussion and fn. 19, ante.)

VI. INADEQUATE CUMULATIVE PROJECTS ANALYSIS.

According to FEIS/FEIR page 4-714, the “methodology and analysis were updated to include consideration of the AltAir/World Energy Project in the transportation, air quality, and noise and vibration cumulative analysis” However, it does not appear that the cumulative impact analysis in the FEIS/FEIR has considered the impacts of the remaining leg of the larger project (i.e. the leg from Slauson to LAUS) now that the Project has been segmented/piecemealed (See **Section VIII**) to include the LPA and the section from Slauson to LAUS. The cumulative impact analysis therefore appears fatally flawed and does not comply with the requirements of either CEQA or NEPA:

²⁰ For example, given the way DEIS/DEIR Table 4.7.7 is formatted and how it addresses Alternatives 1, 2, and 3, it is not possible to easily compare impacts with FEIS/FEIR Table 4.7.6.

A. NEPA

40 CFR Sections 1508.1 define effects or impacts to mean “changes to the human environment from the proposed action or alternatives that are reasonably foreseeable and include the following:

- (3) Cumulative effects, which are effects on the environment that result from the incremental effects of the action when added to the effects of other past, present, and reasonably foreseeable actions regardless of what agency (Federal or non-Federal) or person undertakes such other actions. Cumulative effects can result from individually minor but collectively significant actions taking place over a period of time.

B. CEQA

As noted on FEIS/FEIR page 4-715:

CEQA requires an EIR to evaluate cumulative impacts of a project when the project’s incremental effect is cumulatively considerable. If the project’s incremental effect is not cumulatively considerable, the effect need not be considered as significant, but the basis for concluding that the incremental effect is not cumulatively considerable must be briefly described. “‘Cumulatively considerable’ means that the incremental effects of an individual project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects” (CEQA Guidelines, Section 15064(h)(1)).

The remaining leg of the Project is a probable future project and must be addressed in the analysis. The FEIS/FEIR has failed to do so.

VII. UNDERESTATEMENT OF IMPACTS DUE TO INAPPROPRIATE RELIANCE ON PROJECT MEASURES

A. CEQA

The FEIS/FEIR for the LPA assumes the following measures (“project measures”) are components of the LPA, when making determinations regarding the potential for the LPA to result in impacts, as explained in FEIS/FEIR Chapter 4 impact analysis sections:²¹

4.2.4.1 Project Measures

Refer to Project Measures TR PM-1 (Pre-signals and Queue-cutter Signals) in Section 3.5.1 of Chapter 3, Transportation, and VA PM-8 (Residential Screening for Aerial Structures), described in Section 4.4.4.1 of the Visual and Aesthetics Section of this Final EIS/EIR.

4.4.4.1 Project Measures

This section describes the project measures that will be implemented as part of the LPA. Project Measure VA PM-1 will require that LPA components maintain a consistent visual appearance throughout the alignment and will also require that LPA components near residential properties are designed to maintain the visual character of the residential area. Project Measure VA PM-2 will contribute to the aesthetics of the station areas. Project Measures VA PM-3 through VA PM-5 will soften the appearance of the LPA components along the rail ROWs and at TPSS sites in residential areas. Project Measure VA PM-6 will ensure that project elements outside of the rail ROW and public rights-of-way are designed in a manner that are consistent with the surrounding land uses, which are required to comply with the local zoning ordinances. Project Measure VA PM-7 will ensure that lighting will not substantially alter the existing lighting levels of the surrounding properties. Project Measure PM-8 will provide a vertical screening element on aerial structures to limit views of LRVs from the backyards of residential properties

²¹ See Chapter 4 of the FEIS/FEIR.

in locations where soundwalls are not sufficiently tall to provide screening.

- VA PM-1 Design Standards.** LPA components, including but not limited to track alignment, auxiliary facilities, parking facilities, and MSF site options, will be designed per MRDC, Metro's Systemwide Station Design Standards, and Standard/Directive Drawings, or equivalent.
- VA PM-2 Public Art.** Public art will be installed at station areas and will follow MRDC or equivalent, Metro's Systemwide Station Design Standards, and Metro Art Program Policy.
- VA PM-3 Landscaping.** New landscaping will be installed consistent with MRDC and Systemwide Station Design Standards, or equivalent.
- VA PM-4 Landscaping Screening.** TPSSs in residential areas will be landscaped or incorporate design features to screen or improve the appearance of structures.
- VA PM-5 Landscaping at MSF Site.** At the MSF site, existing landscaping and barriers facing residential areas will either remain in place or will be replaced with other types of landscaping and barriers that will obstruct views of the MSF site from residential areas.
- VA PM-6 Local Zoning Ordinances.** LPA elements that are located on properties outside of the rail ROW and public ROW will adhere to local zoning ordinances as they pertain to scenic quality.
- VA PM-7 Lighting.** Operational lighting will be consistent with MRDC or equivalent. Lighting will be directed away from surrounding properties.

VA PM-8 Residential Screening for Aerial Structures. Where aerial structures will be situated adjacent to the rear of residential properties in the Cities of Paramount, Bellflower, Cerritos, and Artesia and the height of the soundwalls (Mitigation Measure NOI-1) on top of the aerial structures will be less than eight feet, a vertical screening element will be placed at the top of the soundwalls on the aerial structures to block the line-of-sight between the LRT vehicles on the aerial structures and the rear yards of adjacent residential properties. The combined height of the vertical screening element and soundwall will be at least eight feet.

4.7.4.1 Project Measures

NOI PM-1 Crossing Signal Bells. Crossing signal bell noise will not exceed 75 dBA Lmax sound exposure level at 10 feet at all protected at-grade crossings. Crossing signal bells at the locations identified in the following table, will be equipped with shrouds to direct bell noise away from residential sensitive receivers. This measure has been coordinated with CPUC but remains subject to its final approval.

NOI PM-1 Crossing Signal Bells Shroud Locations

NOI PM-1 Crossing Signal Bells Shroud Locations

Grade Crossing Locations	
Albany St	Century Blvd
Santa Fe Ave	Somerset Blvd
Rugby Ave	Clark Ave
Seville Ave	Alondra Blvd
Miles Ave	186th St
Bell Ave	Pioneer Blvd
Otis Ave	-

NOI PM-2 Gate-Down-Bell-Stop Variance. Metro will apply for a gate-down-bell-stop variance at the locations

identified in the following table to reduce the duration of bell ringing and therefore reduce impacts at residential sensitive receivers. Crossing signal noise will not exceed 30 seconds in duration. This measure has been coordinated with CPUC but remains subject to its approval.

NOI PM-2 Gate-Down-Bell-Stop Locations

Grade Crossing Locations	
Albany St	Century Blvd
Santa Fe Ave	Somerset Blvd
Rugby Ave	Clark Ave
Seville Ave	Alondra Blvd
Miles Ave	186th St
Bell Ave	Pioneer Blvd
Otis Ave	-

4.10.4.1 Project Measures

The following project measures have been identified to reduce potential adverse operational effects of the LPA.

HAZ PM-1 Handling, Storage, and Transport of Hazardous Materials or Wastes (Operation)

During operation of the LPA, hazardous materials may be temporarily stored, handled, or transported along the alignment and at the MSF. As required by Metro, the operator will provide an industrial waste management plan and/or waste and hazardous materials management plan, such as a plan defined in Title 19 CCR or a Spill Prevention, Control, and Countermeasure Plan prior to the start of revenue service.

This plan will identify the responsible parties and outline procedures for hazardous waste and hazardous materials handling, storage, and transport during operation of the LPA. The plan will be prepared to Metro Contractor specifications, submitted to Metro prior to operation, and will be implemented during operation. The plan will:

- Comply with prescribed best management practices (BMPs) to prevent hazardous material releases and cleanup of any hazardous material releases that occur
- Comply with the SWRCB Construction CWA Section 402 General Permit conditions and requirements for transport, labeling, containment, cover, and other BMPs for storage of hazardous materials (SWRCB 2017) Ground-disturbing activities could occur along the LPA if trenches or other soil disturbing activities are needed to maintain or replace the rails or underground rail features or utilities. If ground-disturbing activities occur during operation and undocumented hazardous materials are identified, the operator will comply with the plan identified above for known contaminant sources and applicable federal and state regulations, such as RCRA, CERCLA, the Hazardous Materials Release Response Plans and Inventory Law, and the Hazardous Waste Control Act.

HAZ PM-2 Disposal of Groundwater (Operation)

If disposal of contaminated groundwater is required during operation of the LPA, (decontamination water, purge water, dewatering, etc.), the LARWQCB will be consulted and Metro will comply with permits as required by the LARWQCB. LARWQCB may require that an individual National Pollutant Discharge Elimination System (NPDES) permit and/or waste discharge requirements (WDR) be obtained for dewatering and discharge activities.

Additionally, the following agencies will be contacted as needed:

- City of Los Angeles Sanitation will be notified if contaminated groundwater will be discharged to the sewer system.
- City of Vernon Health and Environmental Control Department will be contacted if contaminated groundwater will be discharged to the stormwater system.
- County of Los Angeles Department of Public Health will be contacted if contaminated groundwater is encountered during dewatering within the boundaries of the following cities:

Huntington Park, Bell, Cudahy, South Gate, Downey, Paramount, Bellflower, Cerritos, Artesia, and the unincorporated community of Florence-Firestone.

The groundwater discharge and disposal requirements vary by agency, location, concentration, and contaminants of concern and are therefore developed in consultation with the agency and the project proponent.

HAZ PM-3 Contaminated Soil, Soil Vapor, and Groundwater (Operation)

Prior to the start of operation of the LPA, the operator will retain a qualified environmental consultant to prepare a Soil Management Plan, Soil Vapor Management Plan (and/or Landfill Gas Accumulation Management Plan), Soil Reuse Management Plan, and Groundwater Management Plan or a combined Soil, Soil Vapor, Soil Reuse, and Groundwater Management Plan to address the possibility of encountering contaminated soil, soil vapor, and groundwater during operation. These plans will be completed to Metro's contractor specifications and submitted to Metro prior to operation and any ground-disturbing activities for the LPA.

Depending on the overall design of the LPA, contaminated soil, soil vapor, and/or groundwater may be encountered during normal operation of the LPA (dewatering or soil vapor venting) or during repairs and maintenance along the alignment that involve disturbance of soil, soil vapor, or groundwater (trenching, potholing, and utility repairs).

The Soil and Soil Vapor Management Plans (and/or Landfill Gas Accumulation Management Plan) must establish provisions per Metro's contractor specifications for the disturbance of contaminated materials (known and undocumented). Proper management and disposition of contaminated soils will be determined in consultation with appropriate regulatory agencies and in accordance with applicable federal and/or state guidance (USEPA, DTSC, RWQCB, and other local agencies).

The Soil Reuse Management Plan must establish provisions per Metro's contractor specifications for the reuse of contaminated known or undocumented soils. Proper management and disposition of contaminated soils will be determined in consultation with appropriate regulatory agencies and in accordance with applicable federal and/or state guidance (USEPA, DTSC, RWQCB, and other local agencies).

The Groundwater Management Plan must establish provisions per Metro's contractor specifications for encountering and managing contaminated groundwater (known and undocumented). Proper disposal of contaminated groundwater will be determined in consultation with appropriate regulatory agencies and in accordance with applicable federal and/or state guidance (USEPA, DTSC, RWQCB, and other local agencies).

Where open or closed regulatory release cases are already managed by a regulatory agency (e.g., USEPA, DTSC, RWQCB) and Metro's operation involves plans to alter the use of the site and/or disturb contaminated soil and/or groundwater onsite, Metro will notify the regulatory agency of the planned land use changes prior to ground-disturbing activities at the location of the open or closed regulatory release site. The regulatory agency will determine the level of investigation and/or remediation (performance standards) necessary on a case-by-case basis. A closure or no further action determination letter from the regulatory agency will be obtained when investigation and/or remediation is complete.

4.18.4.1 Project Measures

The following project measures would be required during project operation and, therefore, are included as part of the LPA to avoid, minimize, or reduce the potential for impacts on safety and security:

SAF PM-1 Emergency Access. Metro will coordinate access for emergency responders, locations of fire hydrants, and security features with the applicable fire and police departments in addressing fire, life, safety, and

security for the LPA, parking facilities, and station areas within their respective jurisdictions.

SAF PM-2 Security Assessments. Metro will employ an ongoing assessment of security at all WSAB station areas for possible redeployment of law enforcement and security services.

SAF PM-3 Freight Track Clearance. There will be a minimum 20-foot horizontal clearance between the LPA and freight track(s) where the LPA is located at-grade in shared ROW. This occurs primarily from Randolph Street to World Energy.

SAF PM-4 Pedestrian Bridge. The pedestrian bridge at Paramount High School connecting athletic fields to the school will be reconstructed to avoid potential interactions between pedestrians and vehicle traffic.

SAF PM-5 Certification and Approval. The LPA will comply with all FTA and FRA safety and security certification processes and approval prior to the start of revenue operating services. This includes conducting a PHA and a TVA. The PHA will assess the potential hazards introduced by or associated with a design. The TVA will verify critical assets and vulnerability to specific threats based on the likelihood of occurrence and the severity of occurrence and develop countermeasures for addressing prioritized vulnerabilities.

SAF PM-6 Metro Compliance. The LPA will be operated in compliance with Metro's policies, standard operating procedures, and rulebook or equivalent, as approved by Metro.

SAF PM-7 Station Access. The LPA will include modifications to provide safe and ADA- accessible access for pedestrians and bicyclists at stations.

SAF PM-8 Fire/Life Safety Committee. A Fire/Life Safety Committee for the LPA will be established per the MRDC or equivalent and FTA requirements. The committee will be tasked with addressing fire protection requirements for the operation of the LPA, along with establishing minimum requirements that will provide for the protection of life and property from the effects of a potential fire. Additional safety and security design recommendations may be identified by the Fire/Life Safety Committee as the LPA's design progresses further during preliminary engineering and final design.

The EIS/EIR for the proposed project thus understates impacts by improperly relying on Project Measures, which are in fact mitigation measures, as a basis for concluding that Project impacts are less than significant. In *Lotus vs. Department of Transportation* (2014) 223 Cal.App.4th 645, the Court found that an EIR violated CEQA by incorporating proposed mitigation measures into the description of the project, and then basing its conclusion of less-than-significant impacts in part on those mitigation measures. This is exactly what has been done in the DEIR and FEIR for the proposed Project. The Court found that this improperly compressed the analysis of impacts and mitigation measures into a single issue.

In *Lotus*, Caltrans was found to have certified an insufficient EIR based on its failure to properly evaluate the potential impacts of a highway project. The *Lotus* Court found that Caltrans erred by:

incorporating the proposed mitigation measures into its description of the project and then concluding that any potential impacts from the project will be less than significant. As the trial court held, the “avoidance, minimization and/or mitigation measures,” as they are characterized in the EIR, are not “part of the project.” They are mitigation measures designed to reduce or eliminate the damage to the redwoods anticipated from disturbing the structural root zone of the trees by excavation and placement of impermeable materials over the root zones. By compressing the analysis of impacts and mitigation measures into a single issue, the EIR disregards the requirements of CEQA. *Lotus* at pp. 655-656 (emph. added).

The Court ordered Caltrans' certification of the EIR set aside, finding:

[T]his shortcircuiting of CEQA requirements subverts the purposes of CEQA by omitting material necessary to informed decisionmaking and informed public participation. It precludes both identification of potential environmental consequences arising from the project and also thoughtful analysis of the sufficiency of measures to mitigate those consequences. The deficiency cannot be considered harmless. *Id.* at 658.

The analyses of both the proposed LPA in the FEIS/FEIR and the DEIS/DEIR alternatives are fatally flawed because many of the Project Measures are in fact mitigation measures. The EIR thus understates impacts in a way that is far more extreme than what happened in *Lotus*. Significance determinations must be made without consideration of avoidance, minimization, and/or mitigation measures. The EIS/EIR for the Project has violated this precept and understated and failed to identify impacts. The EIS/EIR is therefore fatally flawed. This must be corrected and the EIS/EIR recirculated, pursuant to CEQA Guidelines Section 15088.5(a)(1), (2) and (4).

VIII. IMPROPER PROJECT SEGMENTATION/PIECEMEALING.

As noted in the AEP CEQA Portal – CEQA Portal Topic Paper – Project Description:²²

Piecemealing or Segmenting

The CEQA Guidelines define a project under CEQA as “the whole of the action” that may result either directly or indirectly in physical changes to the environment. This broad definition is intended to provide the maximum protection of the environment.

Piecemealing or segmenting means dividing a project into two or more pieces and evaluating each piece in a separate environmental document, rather than evaluating the whole of the project

²² Available at: <https://ceqaportal.org/tp/CEQA%20Project%20Description%202020%20Update.pdf>

in one environmental document. This is explicitly forbidden by CEQA, because dividing a project into a number of pieces would allow a Lead Agency to minimize the apparent environmental impacts of a project by evaluating individual pieces separately, each of which may have a less-than-significant impact on the environment, but which together may result in a significant impact. Segmenting a project may also hinder developing comprehensive mitigation strategies.

In general, if an activity or facility is necessary for the operation of a project, or necessary to achieve the project objectives, or a reasonably foreseeable consequence of approving the project, then it should be considered an integral project component that should be analyzed within the environmental analysis. The project description should include all project components, including those that will have to be approved by responsible agencies. When future phases of project are possible, but too speculative to be evaluated, the EIR should still mention that future phases may occur, provide as much information as is available about these future phases, and indicate that they would be subject to future CEQA review.

CEQA case law has established the following general principles on project segmentation for different project types:

- For a phased development project, even if details about future phases are not known, future phases must be included in the project description if they are a reasonably foreseeable consequence of the initial phase and will significantly change the initial project or its impacts. *Laurel Heights Improvement Association v Regents of University of California* (1988) 47 Cal. 3d 376.
- For a linear project with multiple segments such as a highway, individual segments may be evaluated in separate CEQA documents if they have logical termini and independent utility. *Del Mar Terrace Conservancy, Inc. v. City Council* (1992) 10 Cal.App.4th 712.

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In this case, as noted in Section I of this letter, Metro approved the Los Angeles Union Station (LAUS) as the terminus for the 19.3-mile West Santa Ana Branch (WSAB) Project, yet the segment of the alignment from downtown Los Angeles to Slauson A (Blue) Line has been omitted from the LPA and FEIS/FEIR. Two of the alternatives in the DEIS/DEIR did analyze an alignment from Pioneer to downtown Los Angeles, but those alternatives have been rejected by Metro and the FEIS/FEIR provides only a very brief summary of these alternatives and their impacts.

According page 1-1 of the FEIS/FEIR Appendix F – Funding and Financing Plan for the West Santa Ana Branch Project:

The original Measure M Expenditure Plan identified funding for two segments: a 6.6-mile fiscal year 2028 (FY28) segment was to be constructed from the southern terminus to the existing Metro C (Green) Line (Alternative 4 from the Draft EIS/EIR, first segment), and the 12.7-mile fiscal year 2041 (FY41) segment was intended to complete the Project north to downtown Los Angeles. The LPA differs from the original Expenditure Plan because while the ultimate northern terminus of this Project remains the same—Los Angeles Union Station—the LPA extends the originally planned first segment by 8.2 miles from the Metro C (Green) Line to the Slauson/A Line Station for a total of 14.5 miles.

It is thus clear that Metro has engaged in improper piecemealing in its selection of the LPA and analysis thereof in the FEIS/FEIR. The additional segment of the Project from Slauson to LAUS is a reasonably foreseeable consequence of the initial phase and will significantly change the initial phase and its impacts. The second phase is also clearly part of the overall utility of the Project as a whole.

IX. IMPROPER ANALYSIS AND IDENTIFICATION OF ENVIRONMENTALLY SUPERIOR ALTERNATIVE.

A. CEQA.

The alternatives analyzed in the DEIS/DEIR are not comparable. Only two of the alternatives include the full alignment of the intended Project. Both Alternative 3 (and thus the LPA) and Alternative 4 only include a portion of the ultimate alignment from downtown Los Angeles to Pioneer. The impacts of the alternatives are not comparable

since Metro has engaged in Project segmentation when it comes to two of the alternatives, Alternative 3 and 4. Since the LPA is a modified version of Alternative 3, the conclusion that the LPA is the environmentally superior alternative is not supported by substantial evidence, since the four alternatives are not comparable.

Further, the manner in which the EIS/EIR analyzes alternatives in reality severely truncates the number of alternatives actually analyzed, thus rendering the EIS/EIR further fatally flawed by not adequately analyzing a reasonable range of alternatives as the law requires. The EIS/EIR does not disclose and ultimately analyze a proper “range” of alternatives, let alone a reasonable one.

As our Supreme Court has held, in-depth consideration of a reasonable range of alternatives is crucial to informed public review. *Citizens of Goleta Valley v. Board of Supervisors* (1990) 52 Cal.3d 553 (“*Goleta II*”). CEQA procedures “are intended to assist public agencies in *systematically* identifying both the significant effects of proposed projects and the feasible alternatives or feasible mitigation measures which will avoid or substantially lessen such environmental effects.” (Pub. Res. Code § 21002, emphasis added.) In furtherance of this policy, Courts have developed a “rule of reason” against which the statutory requirements for consideration of alternatives must be judged. *Goleta II*, 52 Cal.3d at 565-566.

The following passage from *Goleta II* best encapsulates this rule: “Each case must be evaluated on its facts, which in turn must be reviewed in light of the statutory purpose. . . . [A]n EIR for any project subject to CEQA review must consider a reasonable range of alternatives to the project, *or to the location of the project*, which: (1) offer substantial environmental advantages over the project proposal [citation]; and (2) may be ‘feasibly accomplished in a successful manner’ considering the economic, environmental, social and technological factors involved. [Citations.]” *Id.* at 566 (italics in original, underscoring added.)

The alternatives to be considered under the two *Goleta II* parameters are the alternatives that must be reviewed in-depth in an EIR. *Id.* at 569; see *Preservation Action Council v. City of San Jose* (2006) 141 Cal.App.4th 1336, 1350-1351; Guidelines § 15126.6, subd. (f). The EIS/EIR has failed in this regard.

X. POST HOC RATIONALIZATION.

The FEIS/FEIR is a form of post hoc rationalization for a decision already made, given the specifics of the Metro Board's selection of the LPA, as detailed in Section II of this letter.

A. NEPA.

§ 1506.1 Limitations on actions during NEPA process.

- (a) Except as provided in paragraphs (b) and (c) of this section, until an agency issues a finding of no significant impact, as provided in § 1501.6 of this chapter, or record of decision, as provided in § 1505.2 of this chapter, no action concerning the proposal may be taken that would:
 - (1) Have an adverse environmental impact; or
 - (2) Limit the choice of reasonable alternatives.

Metro has engaged in a process which limits the choice of reasonable alternatives by essentially focusing all of the build alternatives, other than the LPA, out of the FEIR/FEIS.

B. CEQA.

As noted by the Supreme Court:

A fundamental purpose of an EIR is to provide decision makers with information they can use in deciding *whether* to approve a proposed project, not to inform them of the environmental effects of projects that they have already approved. If post approval environmental review were allowed, EIR's would likely become nothing more than *post hoc* rationalizations to support action already taken. We have expressly condemned this use of EIR's. (*No Oil, supra*, 13 Cal.3d at p. 79.) *Laurel Heights Improvement Assn. v. Regents of University of California* (1988) 47 Cal.3d 376, 394.

Metro's EIS/EIR process violates this precept, since the Metro Board selected the LPA (revised Alternative 3) prior to certification of the EIR, and the FEIR is focused on

an analysis of the LPA and No Build Alternative, while providing only a brief one-page summary of each of the alternatives. The FEIS/FEIR released to the public thus constitutes improper post hoc rationalization for selection of the LPA, a decision which has already been made by the Metro Board with incomplete information. As detailed in Section 1, not only did the Board not review the full DEIS/DEIR when selecting the LPA, it was also thus not privy to the following important information contained in the DEIS/DEIR regarding the relative benefits of the alternatives, and this information does not appear in the FEIS/FEIR. The Board thus did not have the following information showing that Alternative 3 was inferior to some of the other Alternatives in terms of Travel Performance measures:

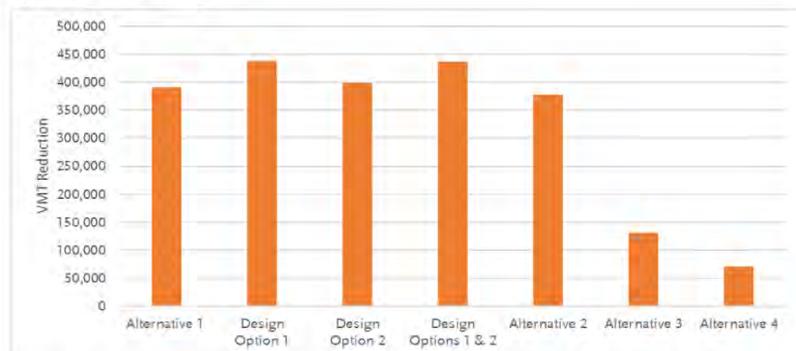
Table 6.1. Travel Forecasting Results by Performance Measures

Performance Measures	Alt. 1	Design Option 1	Design Option 2	Design Options 1 and 2	Alt. 2	Alt. 3	Alt. 4
Project Boardings	60,800	66,800	68,800	72,200	82,800	31,000	11,100
New Transit Trips	17,000	18,300	18,400	19,300	20,200	9,100	4,700
User Benefit Hours (Daily)	15,400	16,600	17,000	17,600	19,700	8,400	4,000
Reduction in VMT	391,500	437,800	398,400	436,800	377,400	130,900	70,800

Source: WSP 2019

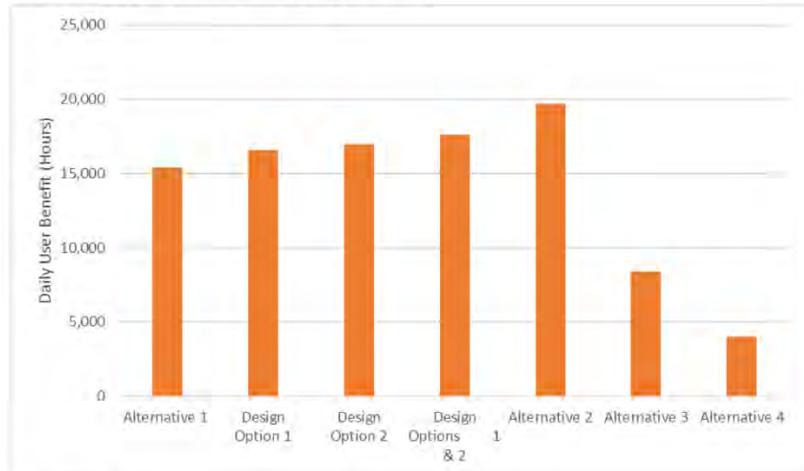
Note: VMT = vehicle miles traveled

Figure 5-12. VMT Reduction



Source: WSP 2019

Figure 5-5. Daily User Benefit Hours (Build Alternatives)



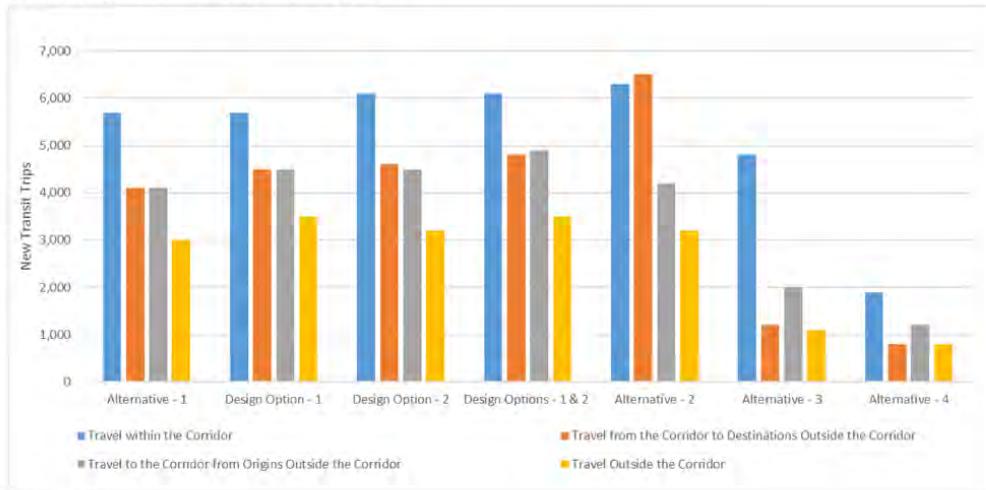
Source: WSP 2019

Table 5.15. User Benefit Hours by Trip Purpose and Time Period (Build Alternatives vs. No Build)

Trip Purpose and Time Period		Alternative 1		Design Option 1		Design Option 2		Design Options 1 and 2		Alternative 2		Alternative 3		Alternative 4	
		Hours	Pct	Hours	Pct	Hours	Pct	Hours	Pct	Hours	Pct	Hours	Pct	Hours	Pct
Peak Period	Home-Based Work	7,100	46%	7,900	48%	7,600	45%	8,100	46%	7,900	40%	3,000	36%	1,500	37%
	Home-Based University	600	4%	700	4%	700	4%	700	4%	1,300	7%	200	3%	200	5%
	Home-Based Other	1,600	10%	1,700	10%	1,800	11%	1,900	11%	2,200	11%	1,200	14%	500	12%
	Non-Home Based	700	5%	800	5%	800	5%	800	5%	1,000	5%	600	7%	300	7%
	Total Peak Period	10,000	65%	11,100	67%	10,900	64%	11,500	65%	12,400	63%	4,900	59%	2,500	62%
Off-peak Period	Home-Based Work	2,400	16%	2,500	15%	2,700	16%	2,700	15%	3,000	15%	1,500	17%	600	15%
	Home-Based University	400	3%	400	2%	500	3%	500	3%	800	4%	100	1%	100	3%
	Home-Based Other	1,700	11%	1,700	10%	1,900	11%	1,900	11%	2,300	12%	1,200	15%	500	13%
	Non-Home Based	900	6%	900	5%	1,000	6%	1,000	6%	1,200	6%	700	8%	300	7%
	Total Off-peak Period	5,400	35%	5,500	33%	6,100	36%	6,100	35%	7,300	37%	3,400	41%	1,600	38%
Daily Total		15,400	100%	16,600	100%	17,000	100%	17,600	100%	19,700	100%	8,400	100%	4,000	100%

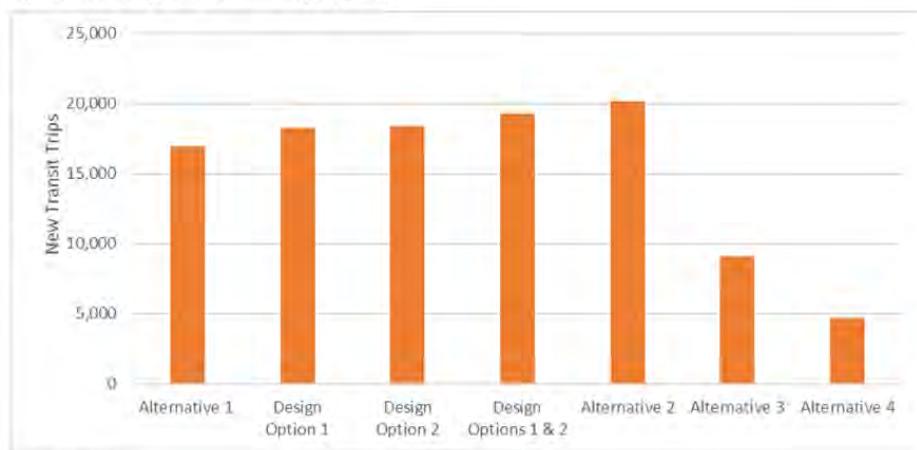
Source: WSP 2019

Figure 5-4. Daily New Transit Trips by Travel Market (2042)



Source: WSP 2019

Figure 5-3. Daily New Transit Trips (2042)



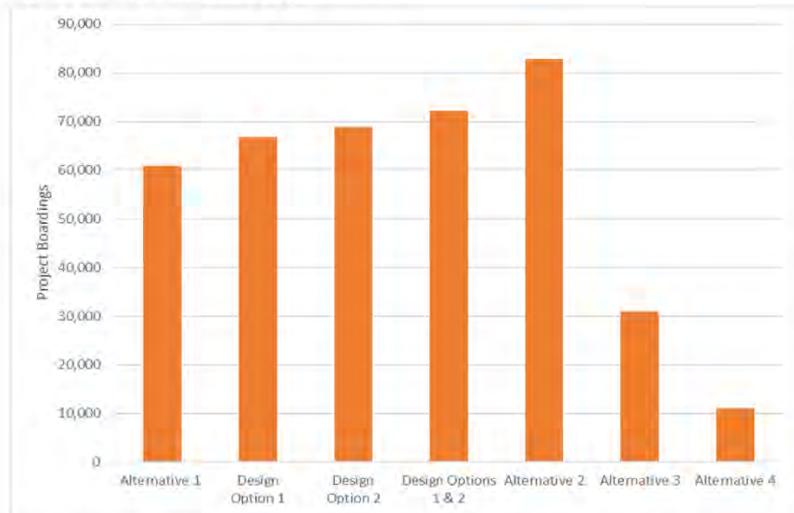
Source: WSP 2019

Table 5.3. Project Boardings by Alternative

Alternative	Project Boardings
Alternative 1	60,800
Design Option 1	66,800
Design Option 2	68,800
Design Options 1 and 2	72,200
Alternative 2	82,800
Alternative 3	31,000
Alternative 4	11,100

Source: WSP 2019

Figure 5-2. Project Boardings by Alternative



Source: WSP 2019

Table 5.2. Change in Boardings Summary by Urban Rail Lines

Urban Rail Line	Difference (Build - No Build)							
	Alternative 1	Design Option 1	Design Option 2	Design Options 1 and 2	Alternative 2	Alternative 3	Alternative 4	
D (Purple) Line	2,100	1,500	-300	-800	8,600	1,200	400	
B (Red) Line	200	-500	-2,200	-2,500	4,300	400	100	
C (Green) Line	-1,900	-1,500	-2,100	-1,800	-3,600	-1,200	4,500	
N-S Line	-11,400	-5,200	-2,800	-6,700	-17,600	1,400	800	
E-W Line	-2,200	-2,200	7,500	1,800	-800	-1,200	-100	
East SFV Line	200	200	200	200	800	200	100	
Sepulveda Pass HRT	1,500	1,600	1,300	1,300	2,800	600	200	

Source: WSP 2019

Notes: E = east; HRT = heavy rail transit; N = north; S = south; SFV = San Fernando Valley; W = west

**XI. FAILURE TO COMPLY WITH REQUIREMENTS FOR
RECIRCULATION DUE TO SUBSTANTIAL CHANGES TO THE
EIS/EIR.**

As explained in NEPA and CEQA: Integrating Federal and State Environmental Reviews,²³ under “NEPA and CEQA, agencies consider a similar set of circumstances under which an environmental document must be re-released for public and agency review when new information becomes available after publication of the draft or final document.”

A. NEPA.

As further explained in NEPA and CEQA: Integrating Federal and State Environmental Reviews:²⁴

NEPA Requirement: NEPA dictates a process for incorporating new information into an already published EIS called supplementation. A supplemental EIS must be prepared if there are “substantial changes in the proposed action” relevant to environmental concerns, or “significant new circumstances or information relevant to environmental concerns and bearing on the proposed action or its impacts” (40 C.F.R. § 1502.9(c)(1)). The supplement should focus on the new information (40 C.F.R. § 1502.9(c)(1)). The CEQ has clarified that new alternatives outside the range of alternatives already analyzed would trigger the requirement for a supplemental review (NEPA’s 40 Most Asked Questions, 29b). Supplements may be prepared for either draft or final EISs. Although scoping is not required, an agency must publish the draft Supplemental EIS for public review and comment before issuing a final EIS (40 C.F.R. § 1502.9(c)(4)). Agencies conducting NEPA reviews also need to be sure to have support in their administrative record for their decisions on whether and how to

²³Pages 36-37: NEPA and CEQA: Integrating Federal and State Environmental Reviews, Executive Office of the President of the United States and the State of California Governor’s Office of Planning and Research, February, 2014.

Available at: https://opr.ca.gov/ceqa/docs/NEPA_CEQA_Handbook_Feb2014.pdf

²⁴ Id.

supplement to ensure those decisions are not arbitrary and capricious.

As amended, 40 C.F.R. § 1502.9 specifies:

(b) ***Draft environmental impact statements.*** Agencies shall prepare draft environmental impact statements in accordance with the scope decided upon in the scoping process ([§ 1501.9 of this chapter](#)). The lead agency shall work with the cooperating agencies and shall obtain comments as required in [part 1503 of this chapter](#). To the fullest extent practicable, the draft statement must meet the requirements established for final statements in section 102(2)(C) of NEPA as interpreted in the regulations in this subchapter. **If a draft statement is so inadequate as to preclude meaningful analysis, the agency shall prepare and publish a supplemental draft of the appropriate portion.** At appropriate points in the draft statement, the agency shall discuss all major points of view on the environmental impacts of the alternatives including the proposed action. (Emphasis added).

(d) ***Supplemental environmental impact statements.*** Agencies:

(1) Shall prepare supplements to either draft or final environmental impact statements if a major Federal action remains to occur, and:

(i) The agency makes substantial changes to the proposed action that are relevant to environmental concerns; or

(ii) There are significant new circumstances or information relevant to environmental concerns and bearing on the proposed action or its impacts.

(2) May also prepare supplements when the agency determines that the purposes of the Act will be furthered by doing so.

- (3) Shall prepare, publish, and file a supplement to a statement (exclusive of scoping (§ 1501.9 of this chapter)) as a draft and final statement, as is appropriate to the stage of the statement involved, unless the Council approves alternative procedures (§ 1506.12 of this chapter).
- (4) May find that changes to the proposed action or new circumstances or information relevant to environmental concerns are not significant and therefore do not require a supplement. The agency should document the finding consistent with its agency NEPA procedures (§ 1507.3 of this chapter), or, if necessary, in a finding of no significant impact supported by an environmental assessment.

As detailed herein, the agency has made substantial changes to the proposed action that are relevant to the environmental concerns. Supplementation is required.

B. CEQA.

CEQA Guidelines Section 15088.5 specifies when recirculation of an EIR is required prior to certification. Section 15088.5 states in part:

- (a) A lead agency is required to recirculate an EIR when significant new information is added to the EIR after public notice is given of the availability of the draft EIR for public review under Section 15087 but before certification. As used in this section, the term “information” can include changes in the project or environmental setting as well as additional data or other information. New information added to an EIR is not “significant” unless the EIR is changed in a way that deprives the public of a meaningful opportunity to comment upon a substantial adverse environmental effect of the project or a feasible way to mitigate or avoid such an effect (including a feasible project alternative) that the project’s proponents have declined to implement. “Significant new information” requiring recirculation include, for example, a disclosure showing that:

- (1) A new significant environmental impact would result from the project or from a new mitigation measure proposed to be implemented.
- (2) A substantial increase in the severity of an environmental impact would result unless mitigation measures are adopted that reduce the impact to a level of insignificance.
- (3) A feasible project alternative or mitigation measure considerably different from others previously analyzed would clearly lessen the environmental impacts of the project, but the project's proponents decline to adopt it.
- (4) The draft EIR was so fundamentally and basically inadequate and conclusory in nature that meaningful public review and comment were precluded.
(Mountain Lion Coalition v. Fish and Game Com. (1989) 214 Cal.App.3d 1043.)

As detailed herein, the LPA would result in additional impacts not addressed in the DEIS/DEIR. The FEIS/FEIR provides substantial additional analysis of modified Alternative 3 (the LPA). The FEIS/FEIR includes revised analyses using altered methodology. The DEIS was thus fundamentally and basically inadequate such that meaningful public review was precluded. The document therefore needs to be recirculated.

XII. FAILURE TO COMPLY WITH NEPA LIMITS ON THE TIME TO PREPARE THE EIS/EIR.

The NEPA Notice of Intent for the EIS was issued on June 26, 2017, the DEIS four years later on July 30, 2021, and the FEIS almost an additional three years later, on March 29, 2024. Code of Federal Regulations (“CFR”) § 1501.10 (b)(2) Time limits requires that an EIS be completed within two years. Metro and the FTA have failed to comply with CFR § 1501.10 (b)(2) and other associated NEPA time-limit-related code sections.

XIII. FAILURE TO COMPLY WITH THE REQUIREMENTS FOR AN FEIR.

As specified in CEQA Guidelines § 15132, the Final EIR shall include the draft EIR, as follows:

15132. CONTENTS OF FINAL ENVIRONMENTAL IMPACT REPORT

The Final EIR shall consist of:

- (a) The draft EIR or a revision of the draft.
- (b) Comments and recommendations received on the draft EIR either verbatim or in summary.
- (c) A list of persons, organizations, and public agencies commenting on the draft EIR.
- (d) The responses of the Lead Agency to significant environmental points raised in the review and consultation process.
- (e) Any other information added by the Lead Agency.

Note: Authority cited: Section 21083, Public Resources Code; Reference: Section 21100, Public Resources Code.

The FEIS/FEIR does not include the DEIS/DEIR,²⁵ but rather the FEIS/FEIR is a redone document which focuses on the LPA and the No Build Alternative. As explained on FEIS/FEIR page S-1:

In January 2022, based on the findings of the Draft EIS/EIR, and in consideration of funding availability, the Metro Board of Directors identified Alternative 3: Slauson A (Blue) Line to Pioneer Station from the Draft EIS/EIR as the Locally Preferred Alternative (LPA), which is the focus of this Final EIS/EIR. For CEQA purposes, the analysis of Alternatives 1, 2, and 4 and the Paramount MSF site option in the Draft EIS/EIR are incorporated here by reference. The

²⁵ See FEIS/FEIR Table of Contents.

Los Angeles County Metropolitan Transportation Authority
Federal Transit Administration
April 29, 2024
Page 58

No Build Alternative is included in this Final EIS/EIR for comparative purposes.

The FEIR therefore fails to comply with CEQA Guidelines Section §15132. It does not include the DEIR.

XIV. CONCLUSION.

Please keep this office on the list of interested persons to receive timely advance notice of all hearings, votes and determinations related to the Project, its EIS/EIR and requested entitlements.

Pursuant to Public Resources Code Section 21167(f), please provide us a copy of each and every Notice of Determination issued in connection with the Project.

In addition, we expressly incorporate by reference all concerns and objections, both written and oral, provided by all other commenters on the Project. Pursuant to Pub. Res. Code Section 21167.6(e) and *Consolidated Irrig. Dist. v. Superior Court* (2012) 205 Cal.App.4th 697, please include all of the hyperlinked references cited in each of the comment letters submitted during the administrative process in and as part of the administrative record.

The FEIS/FEIR violates NEPA and CEQA on numerous grounds. If Metro seeks to proceed with the LPA segment of the Project, the EIS/EIR must be rewritten to correct the errors and omissions noted and then recirculated for public review and comment.

Very truly yours,

/s/ Robert P. Silverstein
ROBERT P. SILVERSTEIN
FOR
THE SILVERSTEIN LAW FIRM, APC

RPS:aa
cc: Records Management (via email RMC@metro.net)

From: Yvette Ximenez <YXimenez@arellanoassociates.com>
Sent: Monday, April 15, 2024 11:40 AM
To: mike_patel@cox.net
Subject: WSAB: Inquiry regarding property acquisitions

Hello Mike,

Thank you for your patience as the team investigated your inquiries regarding the properties located at 2672 Randolph St and 2680 Randolph St in Huntington Park. Please see the response below:

Permanent full acquisitions of these two properties are required because the project will result in permanent impacts to three existing structures on the sites. Specifically, Randolph Street will be realigned and the intersection of Randolph Street/Seville Avenue modified to accommodate the Pacific/Randolph Station and new rail alignment. The realignment along Randolph Street requires shifting the existing sidewalk adjacent to the properties to the south. The Draft EIS/EIR also included realignment of Randolph Street, however, the design was modified for the Final EIS/EIR to include a longer left turn pocket from Randolph Street to Seville Avenue and a wider sidewalk along Randolph Street adjacent to the properties. These refinements resulted in a further shift of the sidewalk to the south and closer to an additional building associated with the properties. Due to the distance between the buildings and the existing sidewalk there is insufficient space to accommodate the realigned sidewalk without affecting the building. Acquisition and relocation would be provided per federal and state requirements.

Even though the Draft EIS/EIR assumed a partial acquisition of these two properties, the plan set that was included in the Draft EIS/EIR identified two of the buildings as affected structures. Relocation of the business on the properties was assumed in the analysis of displacements associated with the project because the structures would be affected. The Final EIS/EIR plan set identifies that the realigned sidewalk would affect three of the buildings on the properties based on the current level of design.

Please let us know if you have questions or need anything further.

Thank you,



Yvette Ximenez
Deputy Project Manager
5851 Pine Avenue, Suite A | Chino Hills, CA 91709
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From: Yvette Ximenez <YXimenez@arellanoassociates.com>

Sent: Thursday, April 4, 2024 11:44 AM

To: Khanna, Meghna <KhannaM@metro.net>; Lam, Brian <LamB@metro.net>; Dierking, Mark <DierkingM@metro.net>

Cc: Edgar Gutierrez <EGutierrez@ArellanoAssociates.com>

Subject: WSAB Inquiries - Property Acquisitions

Hi Team,

1. Mike Patel, Property Owner/Manager

310-420-5741 (leave a message if he doesn't answer)

2672 Randolph St (24 studios) and 2680 Randolph St (41 units) in Huntington Park

Questions:

- He was told in 2021 that this would be a TCE, but why is this now a full acquisition?
- These properties are affordable housing units.
- Why is this acquisition needed at this intersection if it's not a major intersection?



Thank you,



Yvette Ximenez
Senior Project Coordinator

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From: Yvette Ximenez <YXimenez@arellanoassociates.com>
Sent: Monday, April 15, 2024 10:49 AM
To: robertlee105@gmail.com
Subject: RE: 6101 Santa Fe Ave Impact

Hi Robert,

Thank you for your patience. Please see the response to your questions on type of acquisition and duration below and let me know if you have any further questions.

A **temporary construction easement** and **permanent partial acquisition** have been identified on this property based on the current level of design. The temporary construction easement will be required to construct the realigned sidewalk on the north side of the property and curb ramp at the northeast corner of the property. The existing sidewalk along the north side will be reconstructed to accommodate the realignment of Randolph Street and modifications at the Randolph Street/Santa Fe Avenue intersection required to accommodate the project. Specific construction durations have not been determined at this time but will be communicated to the property owner during the acquisition process. The permanent partial acquisition will be required to accommodate the footprint of the reconstructed curb ramp. This permanent acquisition will not affect the structure on the property.

Thank you,



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From: robertlee105@gmail.com <robertlee105@gmail.com>
Sent: Wednesday, April 10, 2024 8:31 AM
To: Yvette Ximenez <YXimenez@arellanoassociates.com>
Subject: RE: 6101 Santa Fe Ave Impact

Hi Yvette,

Following up on more detail information of the potential impact, Grade Crossing.

Thank you.

Robert Lee

213-925-3632

From: robertlee105@gmail.com <robertlee105@gmail.com>
Sent: April 4, 2024 11:17 AM
To: yximenez@arellanoassociates.com
Subject: 6101 Santa Fe Ave Impact

Hi Yvette,

Thank you for taking time to explain the details.
Please reply to this email with more detail info and I will let our team know about the potential impact.

Robert Lee
213-925-3632
6101 Santa Fe Ave
HP CA H

From: Khanna, Meghna
Sent: Friday, April 19, 2024 4:31 PM
To: khammerstein@idsrealestate.com
Cc: Yvette Ximenez <yximenez@arellanoassociates.com>; Lam, Brian <LamB@metro.net>
Subject: RE: SGL Project - Direct Affect to Managed Parcel (APN 6310-027-022)

Hello Kyle -

A temporary construction easement and permanent partial acquisition have been identified on this property based on the current level of design. The temporary construction easement will be required to construct the realigned sidewalk on the west side of the property. The existing sidewalk along the west side will be reconstructed to accommodate the realignment of South Boyle Avenue and modifications at the Randolph Street/State Street intersection required to accommodate the project. Specific construction durations have not been determined at this time but will be communicated to the property owner during the acquisition process. The permanent partial acquisition will be required to accommodate the realigned street and sidewalk. This permanent acquisition will not affect the structures on the property but will affect 12 parking stalls along the west side of the property, which is less than 5% of the total parking on the site.

Please let me know if you have any questions or need anything further.

Thanks,
Meghna Khanna, AICP
LA Metro
Deputy Executive Officer
Countywide Planning & Development
213.922.3931 (work)
213.393.2339 (cell)
metro.net | facebook.com/losangelesmetro | @metrolosangeles
Metro provides excellence in service and support.

From: Kyle Hammerstein <khammerstein@idsrealestate.com>
Sent: Monday, April 15, 2024 7:01 PM
To: Yvette Ximenez <YXimenez@arellanoassociates.com>
Subject: RE: SGL Project - Direct Affect to Managed Parcel (APN 6310-027-022)

Hi Yvette,

Thank you for getting back to me. Can you please address my question regarding what this partial acquisition is planned to be used for?

Thank you,



Kyle Hammerstein – DRE Lic. #02122557
Manager – Landlord Services
IDS Real Estate Group
515 S. Figueroa Street, 16th Floor
Los Angeles, California 90071
T: 213.873.5805 C: 424.247.3528
E: khammerstein@idsrealestate.com
www.idsrealestate.com

From: Yvette Ximenez <YXimenez@arellanoassociates.com>
Sent: Monday, April 15, 2024 1:46 PM
To: Kyle Hammerstein <khammerstein@idsrealestate.com>
Subject: RE: SGL Project - Direct Affect to Managed Parcel (APN 6310-027-022)

Hi Mr. Hammerstein,

Thank you for your comments on the Southeast Gateway Line. We appreciate your feedback. The 30-day waiting period ends on April 29th; staff will prepare a summary of comments (and corresponding responses) received during circulation of the Final EIS for FTA's consideration. We appreciate your involvement in this public process.

Southeast Gateway Line Team

----- Original Message -----

From: Kyle Hammerstein [khammerstein@idsrealestate.com]
Sent: 4/9/2024, 11:59 AM
To: sgl@metro.net
Subject: SGL Project - Direct Affect to Managed Parcel (APN 6310-027-022)

Hello,

My name is Kyle Hammerstein and I received a notice from LA County Metro regarding the Southeast Gateway Line directly affecting a project I manage on behalf of my client, FR/Cal Boyle Street, LLC, who owns a property directly affected by the SGL project. The project owned is on the northeast corner of Randolph St. and State St. with the address 6250 S. Boyle Ave., Vernon, CA (APN 6310-027-022). Per the EIR report sent out, Metro is planning to partially acquire a portion of the property if the final EIR for the LPA is approved by the FTA and a Record of Decision is made.

The portion of the property potentially being acquired is shown on page 370 of the EIR PDF (top right corner). In order to fully understand the negative impacts of this potential partial acquisition, can you please advise what this partial acquisition is planned to be used for?

Thank you,

Kyle Hammerstein – DRE Lic. #02122557



Manager – Landlord Services

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-LAEmHhHzdJzBITWfa4Hgs7pbKl

From: Yvette Ximenez <YXimenez@arellanoassociates.com>
Sent: Monday, May 6, 2024 3:56 PM
To: Adam Parker
Cc: Cathy Logan; Herman Winslow; West Santa Ana Branch Outreach Team
Subject: RE: Future communications and some questions
Attachments: Acquisition Map - Arthur Avenue.pdf

Hello Adam,

Apologies for the delay. Please see responses below:

1. Based on the information at the June 2023 meeting, it looked like there might be a temporary construction easement on the northwest corner of our property, as marked. Is that still the current plan?

Answer: Yes. A temporary construction easement is still required along the western edge of the property for construction of the retaining wall for the light rail tracks. A temporary construction easement (TCE) is required for staging materials and equipment during the construction period. The property within the TCE would be returned at the end of construction. Please see attached for information on the location of the TCE.

2. As seen in the "Appendix B_Final Advanced Conceptual Design Part 1," it looks like the current plan is to build an 8 foot sound wall on top of a retaining wall along the entire length of our property line and this project. Is that correct? Or is there a 16 foot sound wall that starts at the ramp as well?

Answer: An 8-foot high soundwall is proposed on top of the retaining wall and bridge structure west of the property to minimize noise from the light rail alignment. Additionally, a soundwall is proposed beneath the proposed bridge structure that starts west of the property at approximately the midway point to minimize noise from the at-grade freight tracks that travel parallel to and just west of the light rail alignment. The soundwall will extend from the ground to the bottom of the LRT structure for the entire length of the property.

3. It looks like the current plan is for a ramp to be built to take the light rail trains from grade to the planned aerial station at Paramount/Rosecrans, and the start of this ramp would roughly be behind our property. Is that correct?

Answer: Yes. The profile of the light rail tracks will start to rise approximately 300 feet south of I-105.

Thank you,



Yvette Ximenez

Deputy Project Manager

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From: Adam Parker <williamadamwashburneparker@gmail.com>
Sent: Monday, May 6, 2024 11:14 AM
To: Yvette Ximenez <YXimenez@arellanoassociates.com>
Cc: Cathy Logan <catiasmom@aol.com>; Herman Winslow <herwinslow@yahoo.com>
Subject: Re: Future communications and some questions

Hello,

I wanted to send a polite follow up. Just because we were told to expect a response a week ago:)

Thank you so much for your help!

On Thu, Apr 25, 2024 at 3:03 PM Yvette Ximenez <YXimenez@arellanoassociates.com> wrote:

Hi Adam,

Thank you for your email. We will provide a response to these inquiries by early next week.

Thank you,



Yvette Ximenez
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From: Adam Parker <williamadamwashburneparker@gmail.com>
Sent: Wednesday, April 24, 2024 12:42 PM
To: Yvette Ximenez <YXimenez@arellanoassociates.com>; Cathy Logan <catiasmom@aol.com>; Herman Winslow

<herwinslow@yahoo.com>

Subject: Future communications and some questions

Hi Yvette Ximenez,

My name is Adam Parker, I'm the secretary for the HOA association at 13919 Arthur Ave in Paramount.

Unit 24 in our complex recently received a letter from Meghan Khanna, Project Manager, noting that our property is identified for potential impact for the Southeast Gateway Line.

Would it be possible to send future communications to all units in our HOA? So far, Unit 24 is the only one we know who received this letter. We have 24 units, numbered from 1-24.

If that's too much, would it be possible for communications to be sent to the board members (Units 9, 12, and 22) so that we can update our HOA members as necessary?

Also, please let me know if you might be able to help us with the following inquiries, or direct us to the proper person:

I was able to attend a community meeting last June where there were associates on hand to show the current planned impacts. I've attached the pictures I have from that meeting, as well as a page from "Appendix B_Final Advanced Conceptual Design Part 1" which concerns our property.

Our property:

13919 Arthur Ave

Paramount, CA 90723

-24 Condo units #1-24

It looks like our property might be alternatively labeled:

WSAB-810

6242023014

Near the markings labeled 1097 and 1098.

Questions:

1. Based on the information at the June 2023 meeting, it looked like there might be a temporary construction easement on the northwest corner of our property, as marked. Is that still the current plan?
2. As seen in the "Appendix B_Final Advanced Conceptual Design Part 1," it looks like the current plan is to build an 8 foot sound wall on top of a retaining wall along the entire length of our property line and this project. Is that correct? Or is there a 16 foot sound wall that starts at the ramp as well?
3. It looks like the current plan is for a ramp to be built to take the light rail trains from grade to the planned aerial station at Paramount/Rosecrans, and the start of this ramp would roughly be behind our property. Is that correct?

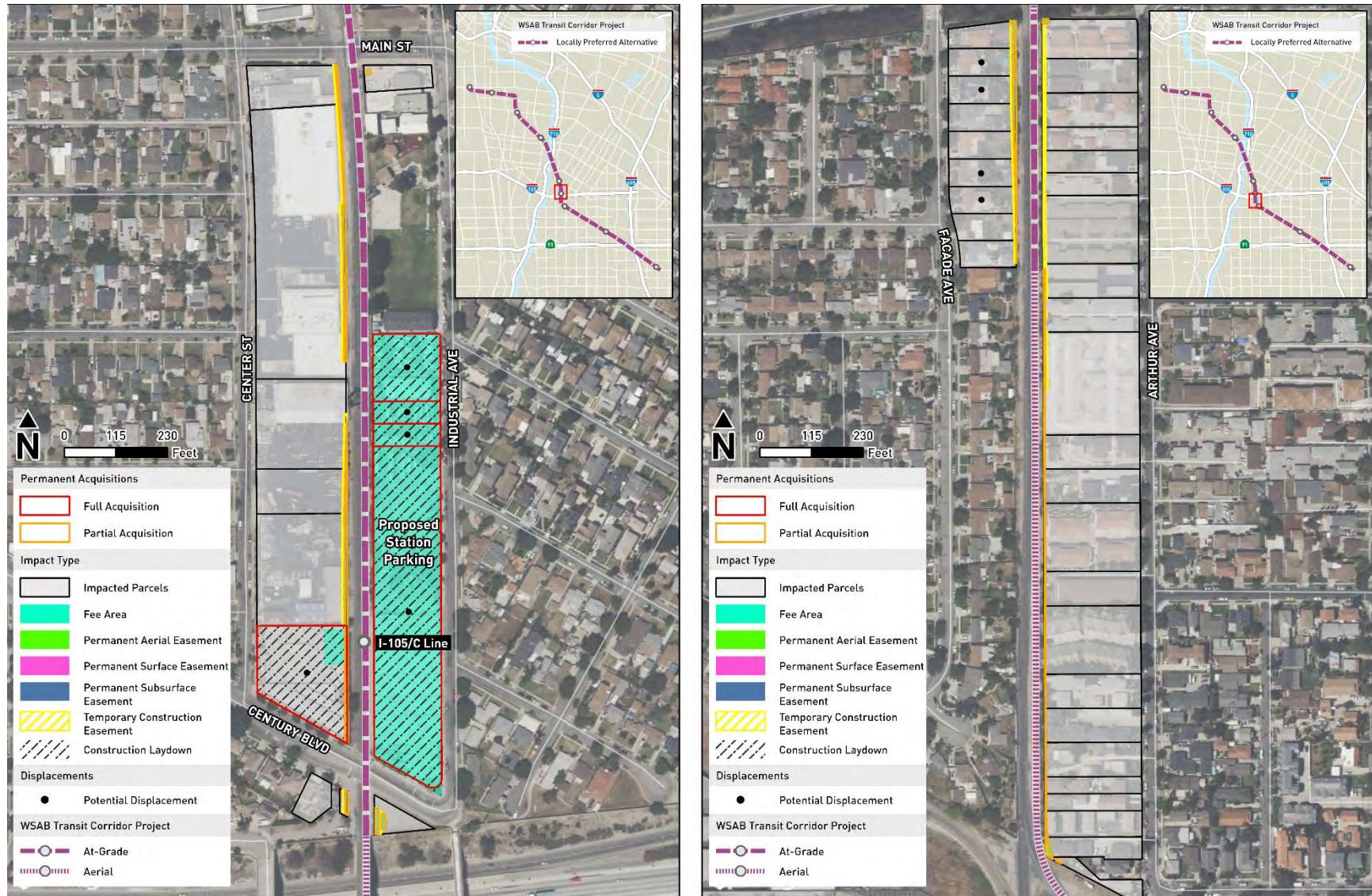
Thank you so much for your help,

Adam Paker

13919 Arthur Ave

HOA Secretary

Figure 4.3-10. Property Acquisitions for the Locally Preferred Alternative



Source: Metro 2024m

From: Khanna, Meghna <KhannaM@metro.net>
Sent: Friday, April 19, 2024 4:39 PM
To: jvanzandt@titanterminal.com
Cc: Yvette Ximenez; Edgar Gutierrez; Cortez, Annette; Dierking, Mark; Edgar Gutierrez; Lam, Brian
Subject: RE: SGL Public Comment and request for follow up.

Categories: To File

Hello Jason –

The difference between Final the EIS/EIR and the plans is related to what is on private property vs within Ports-owned ROW.

The loss of off-street parking identified in Table 3-18 in the Final EIS/EIR identifies parking removed on private property, with the environmental analysis focused on compliance with the parking code from the applicable city. As shown in this table, 3 parking spaces on the private property would be removed to accommodate the project. A portion of the existing parking lot/parking spaces at 4570 Ardine Street is located in Ports-owned ROW. Based on our records, the company currently has a lease agreement with the Ports to lease the portion of the ROW for the unloading of hazardous and non-hazardous products. Section 3 of the lease agreement identifies that the agreement can be terminated with a 30-day notice. Therefore, as these parking spaces are not located on private property and the lease agreement between the property owner and the Ports has a termination clause, the loss of these parking spaces was not included in the analysis from a code compliance standpoint.

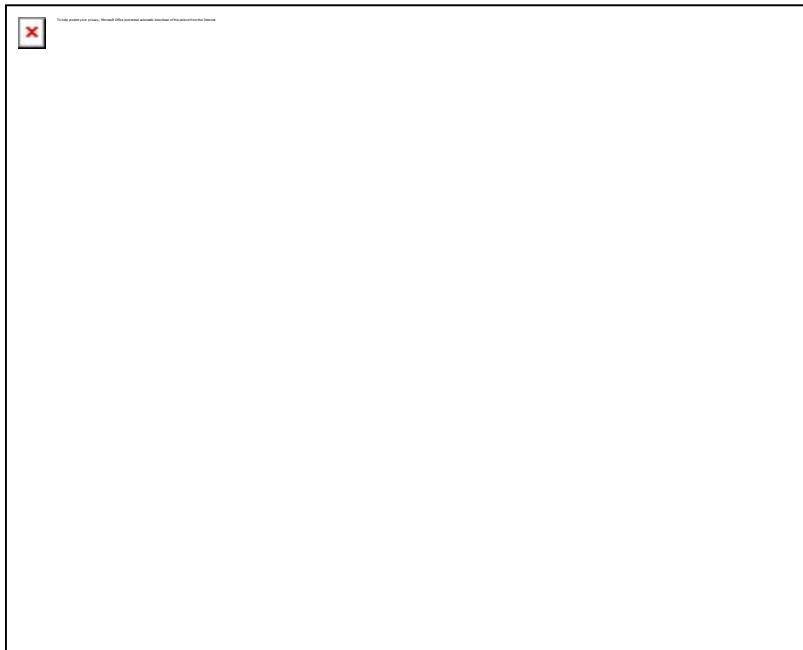
Metro will continue to work with the property owner during the property acquisition process to determine if there are ways to minimize the loss of parking on the private property or offset the loss of these 3 parking spaces. We will reach out to schedule a meeting in the coming months, as we advance design after project approval and coordinate further with Ports and UPRR.

Thanks,
Meghna Khanna, AICP
LA Metro
Deputy Executive Officer
Countywide Planning & Development
213.922.3931 (work)
213.393.2339 (cell)
metro.net | facebook.com/losangelesmetro | @metrolosangeles
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Meghna,

You may not remember me as it has been almost three years since we last spoke. I work for Titan Terminal, located at 4570 Ardine St in South Gate. As a rail terminal whose business solely relies on railcars delivered daily on the freight line that will be adjacent to the new Southeast Gateway Line, I'd like to discuss more how we will be affected by this project. There are multiple easements on our property in regards to the crossing at Ardine and Salt Lake as well as for the relocation of the freight line. I was reviewing the EIR and noticed that our business was listed as only having 3 off-street parking spots affected when the attached track plans from 2021 includes 20+ parking spots affected. Discrepancies like this urge the importance for us to discuss this project in greater detail as I am concerned with our business to continue to operate due to this project.

Please let me know if you are able to discuss the project via a phone or Teams call.



Thank You

Jaron Bentruude

Operations, VP

Titan Terminal & Transport

C: 385-355-4165

Annette Cortez

LA Metro
Senior Director, Alternative Project Delivery

Communications/Community Relations

213.598-4102 C

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-LAEmHhHzdJzBITWfa4Hgs7pbKl

From: Lam, Brian <LamB@metro.net>
Sent: Tuesday, July 23, 2024 1:22 PM
To: Faraz Aqil
Cc: WSAB; West Santa Ana Branch Outreach Team; Yvette Ximenez; Khanna, Meghna; Carlson, Kristin; Edna Jimenez
Subject: RE: Southeast Gateway Final EIR Comment - Faraz Aqil

Hi Faraz,

I wanted to provide an update regarding the email below, specifically, regarding the property with the address 18743 Pioneer Boulevard (referenced in your second comment). This property is not currently owned by Metro but will be acquired by Metro for the Southeast Gateway Line Project. This does not change the information included in the Final EIS/EIR regarding displacements.

Thank you,

Brian Lam
LA Metro
Manager, Transportation Planner
Countywide Planning & Development
213.922.3077
metro.net | facebook.com/losangelesmetro | @metrolosangeles
Metro's mission is to provide world-class transportation for all.

From: Lam, Brian
Sent: Thursday, June 6, 2024 11:33 AM
To: Faraz Aqil <aqil_faraz@yahoo.com>
Cc: WSAB <WSAB@metro.net>; West Santa Ana Branch Outreach Team <WSAB@arellanoassociates.com>; Yvette Ximenez <yximenez@arellanoassociates.com>; Khanna, Meghna <KhannaM@metro.net>; Loya, Rene <Rene.Loya@wsp.com>; Kristin Carlson (Kristin.Carlson@wsp.com) <Kristin.Carlson@wsp.com>; Edna Jimenez <EJimenez@ArellanoAssociates.com>
Subject: RE: Southeast Gateway Final EIR Comment - Faraz Aqil

Hi Faraz,

Hope this email finds you well. I want to thank you again for your comments and involvement in the public participation process. Additionally, please see below for responses to your received comments.

1. Emergency response times were addressed in Chapter 4, Section 4.18.3.2 under the subheading "Emergency Response Services" in both the Draft and Final EIS/EIR. It explains that Metro, in coordination with local jurisdictions, will develop traffic management plans to reduce delays in response times for emergency service providers. As part of the LPA, gate operations at grade crossings will be configured per standards of the California Public Utilities Commission and the traffic mitigation measures. Coordination and operational requirements will minimize the potential impacts on emergency service providers and response times.
2. The Pioneer Station park-and-ride structure has been designed as a multi-floor parking structure, which reduces property acquisition needs and displacements compared to constructing surface parking. Cost and engineering

considerations generally make construction of underground parking less optimal than adding additional above ground levels to provide a given number of parking spaces within a fixed area.

The property with the address of 18743 Pioneer Boulevard, Artesia, CA 90701 is already owned by Metro. For this reason, the property is not shown as an acquisition in the Final EIS/EIR. However, business displacements for the property are included in the analysis for the project because the businesses that operate on the Metro-owned property will be relocated as part of the Project.

3. As noted in common response CR-GEN-4 in Appendix D of the Final EIS/EIR, the Metro Board-approved Grade Crossing Safety Policy for Light Rail Transit, prepared in December 2003 and revised in October 2010, was used to determine locations for grade separation for the Project. This policy provides a systemwide standard methodology in Los Angeles County to determine whether grade crossings along light rail transit lines should be grade separated or at-grade. Key factors in evaluating the need for a grade separation include traffic volumes, train frequency, safety considerations, and a variety of special circumstances (e.g., vertical engineering alignment considerations, effects on traffic operations, pedestrian activity, and adjacent land uses). Based on the Metro Grade Crossing Policy, areas that satisfied the grade separation criteria along the LPA alignment were identified and evaluated.

Metro will continue to coordinate with staff from the California Public Utilities Commission as design advances regarding the design of the Project at each at-grade crossing. If design refinements are identified as design advances and coordination continues, such refinements may be subject to environmental re-evaluation under NEPA and/or CEQA.

As documented in Section 3.5 of the Final EIS/EIR and Attachment 6 of the *West Santa Ana Branch Transit Corridor Final Transportation Impact Analysis Report* (Metro 2024s), the traffic analysis identified and evaluated multiple mitigation measures for the intersections with adverse effects from the Project. As described in Section 3.5.2.1 of the Final EIS/EIR, in developing the mitigation options, consideration was given to the benefits of the mitigation (reducing delays) and the potential for secondary impacts. The results from this analysis concluded that adverse impacts would remain at 12 of the 19 intersections along the LPA alignment as no feasible mitigation measure was identified to fully mitigate the impact to level of service.

4. The Project does not include a station at 183rd Street and Gridley Road in Cerritos; however, the alignment has been designed not to preclude a station at that location. A station was previously considered at that location and eliminated by the Metro Board of Directors in November 2018 due to lack of community support, limited ridership potential, and the proximity to the Pioneer Station in the City of Artesia. Metro's current long-range transportation plan, Our Next LA, does not currently include an extension of the Project to the south.

Thank you,

Brian Lam
LA Metro
Manager, Transportation Planner
Countywide Planning & Development
213.922.3077
metro.net | facebook.com/losangelesmetro | @metrolosangeles
Metro's mission is to provide world-class transportation for all.

From: Faraz Aqil <aqil_faraz@yahoo.com>
Sent: Thursday, May 9, 2024 2:51 PM
To: Yvette Ximenez <yximenez@arellanoassociates.com>
Cc: WSAB <WSAB@metro.net>; West Santa Ana Branch Outreach Team <WSAB@arellanoassociates.com>
Subject: Re: Southeast Gateway Final EIR Comment - Faraz Aqil

Yes, thank you for the confirmation.

I appreciate it.

Sincerely,
Faraz Aqil

On May 9, 2024, at 2:05 PM, Yvette Ximenez <yximenez@arellanoassociates.com> wrote:

Hello,

Are you referring to your email from 4/29/2024, 11:24 PM, which is also included in the email chain below? Yes, we have received those comments.

Thank you,
Metro Community Relations

From: Faraz Aqil <aqil_faraz@yahoo.com>
Sent: Thursday, May 9, 2024 1:36 PM
To: Yvette Ximenez <YXimenez@arellanoassociates.com>
Cc: sqg@metro.net; West Santa Ana Branch Outreach Team <WSAB@arellanoassociates.com>
Subject: Re: Southeast Gateway Final EIR Comment - Faraz Aqil

Hello, and thank you for the response. But I just want to double check that my comments (which were submitted on April 29th at 11:24pm) was received during the circulation of the Final EIR?

Thank you

Sincerely,
Faraz Aqil

On May 8, 2024, at 5:36 PM, Yvette Ximenez <yximenez@arellanoassociates.com> wrote:

Thank you for your comments on the Southeast Gateway Line. We appreciate your feedback. The 30-day waiting period ended on April 29th; staff will prepare a summary of comments (and corresponding responses) received during circulation of the Final EIS for FTA's consideration. We appreciate your involvement in this public process.

----- Original Message -----

From: Faraz Aqil [aqil_faraz@yahoo.com]
Sent: 4/29/2024, 11:24 PM

To: sgl@metro.net

Subject: Southeast Gateway Final EIR Comment - Faraz Aqil

Hello LA Metro and the Southeast Gateway Line Team. This is Faraz Aqil, a resident of Downey who one day hopes to ride the Southeast Gateway Line & use the I-105/C Line station. I wanted to first show my appreciation to LA Metro for this Final EIR and to also say thank you for hosting the community meetings (especially the Walk Audits) that helped to give us important updates on the project and for your team to receive feedback from the public. After reviewing the Final EIR and supplemental documents, I wanted to provide feedback from what I read:

1) Emergency Response Impact on Gardendale St.:

It was mentioned that the Southeast Gateway line will not interfere with emergency response and that any delays will be "less than significant because these plans will not typically involve crossing active corridors" (Attachment C Overriding Considerations pg: 6-2). But on Gardendale St., west of the rail line and very close to the track is a Fire Station named LA County Fire Station #57 (address: 5720 Gardendale St., South Gate, CA 90280). My worry is that since Gardendale St. is a planned At-Grade crossing, and since trains are going to be coming through about every 2 & 1/2 minutes which is 24 total train crossings per hour for both directions (Final EIR, pg: 3-10), the emergency vehicles will have to wait for the train to pass before crossing over to reach residents east of the rail line. And since this is the only Fire Station that serves the Hollydale South Gate neighborhood (as shown on the Final EIR, pg: 4-509), unless LA Metro can grade separate the Gardendale St. crossing, I don't understand how the emergency response delay will be "less than significant" and will not "involve crossing active corridors".

2) Business Displacements & Acquisitions:

I am always hesitant with displacing/trying to move businesses out of their place, but I understand that some business displacement & relocation will be needed to complete the rail line. That's why when choosing between the Paramount MSF & Bellflower MSF, I supported the Bellflower MSF location because the Paramount MSF would have displaced hundreds of business and impacted thousands of jobs because of the Paramount Swap Meet (when compared to the Bellflower Hollywood Sports Paintball & Bellflower BMX).

In the Final EIR, not including the Bellflower MSF, the current projected business displacement is at 58 businesses with 368 employees displaced (pg: 4-78). The most impacted cities with business displacements were: 1) South Gate (19 businesses & 141 employees), 2) Artesia (13 businesses & 48 employees), 3) Los Angeles (10 businesses & 71 employees), and 4) Huntington Park (10 businesses & 33 employees). I want to ask LA Metro to be creative in reducing the amount of businesses displaced as reasonably as possible while still fulfilling its goal of building the Southeast Gateway line. For example: increasing the stories on the parking structure to maintain the same amount of parking spaces would mean less businesses displacements are needed. Or another example: creating bus bays, routing more bus lines and adding more bus frequencies that'll travel to those stations in order to reduce the amount of cars needing parking spaces (that as a result, will reduce the amount of businesses that'll need to be displaced). And while it's good that LA Metro will offer relocation assistance to affected businesses, as mentioned on page 4-80, it's not always possible to relocate business within the same city and relocated businesses will likely to have to travel further away outside their community & customers.

And on the Final EIR pg: 4-77, there's a picture (see below picture #1) of the proposed Pioneer Blvd parking structure and the businesses nearby that will be impacted by it. One of the properties I'm following closely is the property with 3 businesses in address: 18743 Pioneer Blvd., Artesia CA 90701. And according to the picture, that property is not highlighted as part of the parking structure. And yet in the Displacements and Acquisitions Report pg: A-26, it does list the businesses from that address as businesses that will be displaced. Personally, I hope that LA Metro can still do the proposed station parking structure without having to acquire that property and the surrounding properties

since 13 businesses & 48 employees is a lot of displacement. Maybe consider an underground parking structure instead of a surface parking structure?

*Picture #1):
<1714451963998blob.jpg>

3) At-Grade Crossings:

According to the Final EIR, At-Grade crossing gates will be down from about 30-45 seconds (pg: 3-10). This means with the already 2 minutes and 30 seconds of trains coming by during peak times, cars and pedestrians can only have about 1 minute and 45 seconds before the next train closes the At-Grade crossing gates. Unfortunately I don't think that's enough time for cars & pedestrians (especially handicapped/elderly pedestrians) to keep the flow of traffic moving (especially at nearby 4-way intersections). And as specifically mentioned on page 3-56, there is a list of vehicle queues that will exceed the available vehicle storage from nearby intersections at the following at-grade crossing locations:

- Florence Avenue: At California Avenue (East) and California Avenue (West)
- Gardendale Street: At Center Street
- Lakewood Boulevard: At Somerset Boulevard
- Clark Avenue: At Alondra Boulevard
- Alondra Boulevard: At Clark Avenue
- Bellflower Boulevard: At Flora Vista Street and Oak Street (and Mayne St. might I add)
- Artesia Boulevard: At Studebaker Road

I'm worried that many of the At-Grade intersections will get a bad reputation for having high traffic congestion. Also, it would have been very beneficial during the Community Meetings panels to be shown videos or recordings of the Sim Traffic simulations (mentioned in Final EIR, pg: 3-12) in order to visually see how the At-Grade Rail crossings would have impacted traffic.

After reviewing the 29 At-Grade crossings, I compiled a list of all the At-Grade crossings (from Artesia to Huntington Park) and included the Level-of-Service ratings of C or worse for At-Grade crossings who have a high traffic at existing intersections (Chapter 3, page: 3-28 to 3-33):

- Pioneer Blvd** (accommodating layover storage for a three-car train)
- 186th St.**
- Studebaker Rd.** (LOS Rating: C [PM Peak])
- Artesia Blvd.** (LOS Rating: F [AM Peak] & E [PM Peak])
- Bellflower Blvd.** (this 2 lane street has no dedicated left turns and is located in both Downtown Bellflower and next to the future Bellflower Station. This intersection will have much worse traffic if this crossing is not Grade separated from cars/pedestrians).
- Alondra Blvd.** (LOS Rating: E [AM Peak] & D [PM Peak])
- Clark Ave.** (LOS Rating: C [PM Peak])
- Lakewood Blvd** (an important future Bus Rapid Transit line from East Pasadena to Long Beach)
- Somerset Blvd** (LOS Rating: D [AM Peak] & D [PM Peak])
- Century Blvd.** (located between the 105 FWY C [Green] Line Station & the 105 FWY Southeast Gateway Station)
- Main St.** (LOS Rating: C [AM Peak] & C [PM Peak])
- Gardendale St** (LOS Rating: D/D [AM Peak] & C [PM Peak])
- Southern Ave.**
- Rayo Ave** (nearby is the Firestone Blvd/Rayo Ave which has a LOS Rating: F [AM Peak] & F [PM Peak])
- Ardine St** (LOS Rating: D [AM Peak] & C [PM Peak])
- Santa Ana St** (LOS Rating: E/E [AM Peak] & E/E [PM Peak])
- Otis Ave** (LOS Rating: E/E [AM Peak] & E/F [PM Peak])
- Florence Ave** (LOS Rating: C/D [AM Peak] & D/C [PM Peak])
- Bell Ave** (LOS Rating: F [AM Peak] & E [PM Peak])
- Gage Ave** (LOS Rating: C [PM Peak])

- State St.** (LOS Rating: C [AM Peak])
- Randolph St**
- Miles Ave** (LOS Rating: C [AM Peak] & C [PM Peak])
- Seville Ave** (LOS Rating: C [AM Peak] & C [PM Peak])
- Pacific Blvd** (LOS Rating: C [AM Peak] & D [PM Peak])
- Rugby Ave.** (LOS Rating: F [AM Peak])
- Santa Fe Ave** (LOS Rating: C [AM Peak])
- Albany St** (LOS Rating: D [AM Peak] & C [PM Peak])
- Alameda St. (East)**
- Alameda St. (West)**, (Level of Service Rating: D [AM Peak] & C [PM Peak])

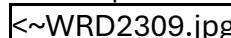
The purpose of the At-Grade list was to show how the At-Grade crossing will negatively impact traffic along the Southeast Gateway rail line. And although in the Final EIR on page 3-82 it lists mitigation measures for some of the lowest LOS rated At-Grade crossings, they were either not enough to get them out of the C-F ratings, or it involves converting the 2 way street intersection into a “signalized intersections” from which I interpreted as street lights (which is something I hoping LA Metro will avoid since traffic signal lights only creates more stops and more traffic, even if they’re a “signalized intersection”). For example, in Gardendale St., there are no stop signs along that street were the future rail line is at. But there is a stop sign at Center St. & Industrial Ave (where they connect with area of Gardendale St. next to the rail line). By adding the signalized intersections, it may improve Center St. & Industrial Ave., but it will negatively impact the traffic on the more busier Gardendale St. Also I’m not sure if the signalized intersection means that the lights will give signal priority to the trains? If they do give signal priority to trains at rail crossings, it will only negatively impact the traffic. And if they don’t give signal priority to the trains, it will negatively impact the speed, frequency, & headway of the train. Either way, At-Grade crossings still impact some group negatively which is why I’m asking LA Metro (even during the construction phase), to change their 29 At-Grade intersections to Aerial, At-Trench, and/or Underground, or to rework the street so cars travel under the train (road tunnel), or above the train (road bridge), or if nothing else to close off the street intersection to incoming traffic.

4) Questions about Future Expansions:

- a) Now that the city of Cerritos is dropping/has dropped their case #: 22STCP04277, is there future plans for a Cerritos train station on 183rd St./Gridley Rd.? While doing construction, will LA Metro be constructing the aerial crossing in a way that will allow LA Metro to convert it into a station should funding be secured for a Cerritos Station?
- b) Does LA Metro still have plans for the Southeast Gateway line (once it's finished) to extend it to the Bloomfield Ave area (borderline with Orange County) or maybe even extending the line into Orange County (with OCTA's permission)?

And with that, I thank you very much for taking the time in reading my feedback comment.

Sincerely,
Faraz Aqil



<1714451963998blob.jpg>

WEST SANTA ANA BRANCH TRANSIT CORRIDOR PROJECT

**Comments Received After the Final EIS/EIR
Comment Period**

THE SILVERSTEIN LAW FIRM

A Professional Corporation

215 NORTH MARENGO AVENUE, 3RD FLOOR
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May 8, 2024

VIA EMAIL boardclerk@metro.net;
and U.S. Mail

Los Angeles County Metropolitan
Transportation Authority Board of
Directors

stammr@metro.net; saferc@metro.net
and U.S. Mail

Ronald Stamm, Princ. Dep County Counsel
Charles Safer, Assistant County Counsel
Office of County Counsel
1 Gateway Plaza
Los Angeles, CA 90012

VIA EMAIL sgl@metro.net and U.S. Mail

Meghna Khanna
Project Manager
Los Angeles County Metropolitan
Transportation Authority
One Gateway Plaza, Mail Stop 99-22-7
Los Angeles, CA 90012

Re: Due Process, CEQA, Eminent Domain, Public Participation and Brown Act
Objections to April 25, 2024 FEIR Certification and April 29, 2024
Recordation of Notice of Determination Re West Santa Ana Branch Transit
Corridor Project (now Southeast Gateway Line); State Clearing House No.
2017061007; Demand to Rescind FEIR Certification and NOD Recordation

Dear Metro Board of Directors, Ms. Khanna and County Counsel:

I. INTRODUCTION.

This firm and the undersigned represent Kramer Metals, Inc. (“Kramer”), a family company located at 1760 East Slauson Avenue. Kramer’s property and business will be directly impacted by Metro’s Southeast Gateway Line project (“Project”), including because Metro has identified Kramer’s property in Project planning documents, including the Project’s EIR, for forced acquisition by eminent domain.

Metro sent a March 29, 2024 letter via mail to Kramer in which Metro informed Kramer (and no doubt other impacted property and business owners) the following information. These screen shots are taken directly from Metro’s March 29, 2024 letter, with yellow highlighting added:

Los Angeles County Metropolitan Transportation Authority
May 8, 2024
Page 2

The Los Angeles County Metropolitan Transportation Authority (LACMTA) completed and released the Final EIS/EIR for the Southeast Gateway Line (previously called West Santa Ana Branch Transit Corridor Project¹ (Project) on March 29, 2024. The Final EIS/EIR describes and evaluates the environmental effects of the Locally Preferred Alternative (LPA). The Final EIS/EIR also includes responses to public comments

(...)

The purpose of this letter is to notify you that the LPA contained in the Final EIS/EIR identifies your property for potential impacts (i.e., either full, partial, permanent, or temporary acquisition).

(...)

A 30-day public review period will conclude on April 29, 2024. Comments may be submitted by email to sq1@metro.net by this date to be considered in FTA's Record of Decision.

The Metro Board will consider certifying the Final EIR at a meeting in the coming months. Information on the meeting time can be found at the website above or by calling the project helpline at 213.922.6262.

A copy of Metro's March 29, 2024 letter is attached at **Exhibit 1** hereto.

Metro's March 29, 2024 letter appears deliberately to have sought to mislead Kramer and others to believe that the Metro Board's certification of the FEIR for the Project, and its approval of the Locally Preferred Alternative ("LPA") for the Project, would happen "in the coming months" after the date of the March 29, 2024 letter. Instead, we have recently discovered the Metro Board purported to certify the FEIR for the Project at a hearing on April 25, 2024. Metro did this without providing Kramer with corrected notice of that planned event, instead creating and perpetuating the expectation that certification of the FEIR would happen not in a mere three or so weeks from the date of the March 29, 2024 letter, but "months" later. We have also discovered that Metro recorded a Notice of Determination ("NOD") for the Project's FEIR on April 29, 2024.

As discussed below, we demand that Metro rescind its April 25 and 29, 2024 actions, and provide proper notice to Kramer and other impacted property and business owners of any rescheduled Project FEIR certification. Metro's actions have prejudiced Kramer and its ability to submit comments on the FEIR prior to the Metro Board's certification of that FEIR.

If Metro does not provide written notice to this office by **May 22, 2024** of its rescissions of the FEIR certification and recordation of the NOD, Kramer will pursue all legal remedies available to it to set aside those Metro actions, and to seek an award of its attorney fees and costs, including pursuant to the Private Attorney General Statute, Code Civ. Proc. § 1021.5, and Federal Civil Rights Law, 42 U.S.C. § 1988.

II. LEGAL GROUNDS REQUIRING METRO TO RESCIND PROJECT FEIR CERTIFICATION AND NOD RECORDATION.

A. Metro's Failed to Provide and Ensure Adequate and Proper Notice to Kramer, an Interested Party Impacted by the Project.

Kramer owns APN 6009-002-012 and APN 6009-002-025, which parcels are identified in the EIR as properties to be partially taken by eminent domain for the Project. This elevates Kramer's right to proper and specific notice by Metro of actions impacting Kramer's property rights and due process rights, including Metro's planned certification of the FEIR for the Project. This is particularly so as CEQA/NEPA compliance is a mandatory prerequisite to the government's ability to exercise the power of eminent domain. Failure properly to comply with CEQA and/or NEPA precludes the acquisition of property by eminent domain. Burbank-Glendale-Pasadena Airport Authority v. Hensler (1991) 233 Cal.App.3d 577, 592-596.

However, Metro failed to give proper advance notice of the April 25, 2024 Board hearing, as well as of the April 17, 2024 Planning and Programming Committee meeting. Instead, Metro lulled Kramer and others into believing that the "Metro Board will consider certifying the FEIR at a meeting *in the coming months.*" (**Exhibit 1**; italics added.) Metro's deceptive actions fall short of CEQA's requirement of a "good faith effort at full disclosure." CEQA Guidelines § 15151. See also notice provisions of Govt. Code 65091.

Ironically, Metro's March 29, 2024 letter informed Kramer that its property was identified for potential impacts and taking as a result of the Project:

The purpose of this letter is to notify you that the LPA contained in the Final EIS/EIR identifies your property for potential impacts (i.e., either full, partial, permanent, or temporary acquisition).

Yet the same letter misled Kramer about the timing of the Metro Board's intended FEIR certification. Further misleading, Metro's March 29, 2024 letter informed Kramer in bold that a 30-day public review period would conclude on **April 29, 2024** to be considered in FTA's Record of Decision.

A 30-day public review period will conclude on April 29, 2024. Comments may be submitted by email to sqj@metra.net by this date to be considered in FTA's Record of Decision.

(**Exhibit 1.**) The letter *then* went on to state that the Metro Board would consider certifying the Final EIR at a meeting in the *coming months.*

Nowhere in Metro’s March 29, 2024 letter, nor in any other communication from Metro to Kramer, did Metro provide notice of the April 25, 2024 Board meeting.

As the Supreme Court ruled improper in Scott v. City of Indian Wells (1972) Cal.3rd 541, 545, Metro has pursued a course of not giving notice to interested parties/property owners adjacent to the Project – and in Kramer’s case, actually in the path of the Project and to be partially taken through eminent domain. Instead, Metro gave misleading notice that prejudiced Kramer, which otherwise would have submitted objections to the FEIR prior to any FEIR certification. Metro’s March 29, 2024 misdirection thus also violated Kramer’s due process rights, including regarding deprivation of property via eventual eminent domain, under the Fifth and Fourteenth Amendments to the U.S. Constitution and under the California Constitution. Id. at 549. It was only through happenstance on May 1, 2024, while this office was checking for a NOD on a different project, that we discovered that the Project and FEIR were considered and approved at the April 25, 2024 Metro Board meeting.

Metro’s website was also misleading through and including the actual April 25, 2024 Metro Board hearing date on the Project and FEIR, and into early May 2024 when the website, under “Next Steps,” still stated that “the Metro Board of Directors *will consider* certifying the Final EIR at a meeting in the coming months.” Neither under “Status” nor under “Latest Updates” was there any mention of the April 25, 2024 Board hearing. Instead, like the March 29, 2024 letter, the website highlighted an April 29, 2024 deadline for comments, while being silent about the fact that the Board hearing took place ***prior to*** expiration of the 30-day review period that started on March 29, 2024.

Metro’s March 29, 2024 letter referred to Metro’s website for “information on the meeting time” for the presumed future FEIR certification date, but neither the metro.net/sgl¹ website nor the <https://www.metro.net/projects/southeastgateway/#status> website as of May 2, 2024 included reference to either the April 25, 2024 Board meeting or the April 29, 2024 NOD recordation. Instead, under “Next Steps,” it continued to state that “the Metro Board of Directors *will consider* certifying the Final EIR at a meeting in the *next coming months*. Visit back for updates.”

Pasted below are excerpts of screen shots taken on May 2, 2024 at 4:04 p.m. from the <https://www.metro.net/projects/southeastgateway/#status> URL:

¹ Metro.net/sgl is the website that Metro included in its March 29, 2024 letter to the impacted property owners. Note, however, that when one enters that website, one gets transferred to the <https://www.metro.net/projects/southeastgateway/> website.

5/2/24, 4:04 PM

Southeast Gateway Line (previously West Santa Ana Branch Transit Corridor) - LA Metro

Status

The Final Environmental Impact Statement/Environmental Impact Report (EIS/EIR) is now available for public review

The Federal Transit Administration (FTA) and Metro have prepared the Final Environmental Impact Statement/Environmental Impact Report (EIS/EIR) for the project, and it is now available for public review. This document describes and evaluates the Locally Preferred Alternative (LPA) and other alternatives considered. The Final EIS/EIR also includes public comments received on the Draft EIS/EIR, which was circulated for public review and comment from July through September 2021, and responses to those comments.

REVIEW THE DOCUMENT

- View the Final EIS/EIR [here](#)
- View the Final EIS/EIR Appendices [here](#)
- View maps and other information in the [interactive project StoryMap](#)

Printed copies are available for public viewing at the locations listed below during regular business hours. **Comments must be received on or before April 29, 2024**, to be considered in FTA's Record of Decision. Your comments may be sent by email to tosgl@metro.net

<https://www.metro.net/projects/southeastgateway#status>

5/2/24, 4:04 PM

Southeast Gateway Line (previously West Santa Ana Branch Transit Corridor) - LA Metro

NEXT STEPS

The Metro Board of Directors **will consider certifying the Final EIR at a meeting in the coming months.** Visit back for updates. FTA will issue a Record of Decision (ROD) in summer 2024 following the 30-day waiting period after publication of the Final EIS.

<https://www.metro.net/projects/southeastgateway/#status>

B. Equitable Estoppel Also Precludes Metro From Validly Certifying the FEIR on April 25, 2024 and Recording the NOD on April 29, 2024.

Metro deceived Kramer, an interested party and impacted property owner, and the general public by failing to give proper advance notice of April 17 and April 25, 2024 Metro hearings and by representing in its March 29, 2024 letter and on its website that the public review period would conclude on April 29, 2024, and that the Metro Board would consider certification of the FEIR “in the coming months.” (**Exhibit 1.**)

Metro must also rescind its April 17, 2024 Planning and Programming Committee meeting vote, its April 25, 2024 Board FEIR certification, and its April 29, 2024 NOD recordation under the doctrine of equitable estoppel. Metro should then properly re-notice those events by giving advance notice to Kramer and other impacted members of the public.

“The doctrine of equitable estoppel is based on the theory that a party who by his declarations or conduct misleads another to his prejudice should be estopped from obtaining the benefits of his misconduct. [Citation.]” Citizens for a Responsible Caltrans Decision v. Department of Transportation (2020) 46 Cal.App.5th 1103, 1128.

As in Citizens for a Responsible Caltrans Decision, where Caltrans similarly misled the public regarding critical CEQA dates and events, Metro’s misleading statements and actions lulled Kramer into believing FEIR certification would occur “in the coming months,” not in the coming “weeks.” Kramer was ignorant of the true state of facts related to Metro’s actual hearing dates and actions, including any deadlines by which to submit objections on the FEIR prior to the undisclosed April 25, 2024 Metro hearing date, and relied upon Metro’s March 29, 2024 letter and conduct to Kramer’s injury. “A defendant [Metro] should not be permitted to lull his adversary into a false

sense of security, cause the bar of the statute of limitations to occur and then plead in defense the delay occasioned by his own conduct.” Citizens for a Responsible Caltrans Decision at 1128.

“It is well settled that a public entity may be estopped from asserting the limitations of the claims statute where its agents or employees have prevented or deterred the filing of a timely claim by some affirmative act.” John R. v. Oakland Unified School Dist. (1989) 48 Cal.3rd 438, 445.

“Public participation is an essential part of the CEQA process. Each public agency should include provisions in its CEQA procedures for wide public involvement, formal and informal, consistent with its existing activities and procedures, in order to receive and evaluate public reactions to environmental issues related to the agency’s activities.”

Valley Advocates v. City of Fresno (2008) 160 Cal.App.4th 1039, 1074; CEQA Guidelines § 15201. See also Concerned Citizens of Costa Mesa, Inc. v. 32nd Dist. Agricultural Assn. (1986) 42 Cal.3d 929, 935 (members of the public hold a “ ‘privileged position’ . . . in the CEQA process . . . based on a belief that citizens can make important contributions to environmental protection’ ”).

C. Metro’s Certification of the FEIR is Further Invalid and Must Be Rescinded Because the Metro Board Did Not Have the Full FEIR Before It.

CEQA Guidelines § 15090 – Certification of the Final EIR – requires that: “(a) Prior to approving a project the lead agency shall certify that: (1) The final EIR has been completed in compliance with CEQA; (2) **The final EIR was presented to the decision-making body of the lead agency, and that the decision-making body reviewed and considered the information contained in the final EIR prior to approving the project.**” (Emphasis added.)

As shown in the following screenshot of the April 25, 2024 Metro Board Agenda, Item 10, the Metro Board was not presented with the FEIS/FEIR to review and consider; members were only presented with the Executive Summary from the FEIS/FEIR, just as they were only presented with the Executive Summary of the DEIS/DEIR when selecting the Locally Preferred Alternative.

Los Angeles County Metropolitan Transportation Authority
May 8, 2024
Page 8

PLANNING AND PROGRAMMING COMMITTEE MADE THE FOLLOWING
RECOMMENDATION (5-0):

10. SUBJECT: SOUTHEAST GATEWAY LINE (FORMERLY WEST SANTA
ANA BRANCH) - PROJECT APPROVAL AND
CERTIFICATION OF FINAL ENVIRONMENTAL IMPACT
REPORT 2024-0104

RECOMMENDATION

CONSIDER:

A. APPROVING the board-identified Locally Preferred Alternative (LPA) as the Southeast Gateway Line (formerly West Santa Ana Branch) Light Rail Transit (LRT) Project (Project), which is a 14.5- miles LRT line with nine (9) stations and includes a new C Line Infill station at the I-105 Freeway. The Project extends from its northern LPA terminus at the Glusoni/A Line Station located in the City of Los Angeles/Florence-Firestone unincorporated area of Los Angeles (LA) County to its southern terminus at the Pioneer Station located in the City of Artesia and includes a new C Line Infill station at the I-105 Freeway. Approval of the Project also provides for the inclusion of five (5) parking facilities, ancillary facilities and a Maintenance and Storage Facility (MSF) in the City of Bellflower.

B. CERTIFYING in accordance with the California Environmental Quality Act (CEQA) the Final Environmental Impact Report (EIR), which includes the design option that would close 186th Street but keep 187th Street open in the City of Artesia.

C. ADOPTING, in accordance with CEQA, the:

1. Findings of Fact and Statement of Overriding Considerations, and
2. Mitigation Monitoring and Reporting Plan (MMRP); and

D. AUTHORIZING the Chief Executive Officer to file a Notice of Determination with the Los Angeles County Clerk and the State of California Clearinghouse.

Meeting	Page 12
Board of Directors - Regular Board Meeting	April 25, 2024
<u>Attachments:</u>	Attachment A - Executive Summary Attachment B - MMRP Attachment C - Finding of Fact Statement of Overriding Considerations Presentation

Although the Metro Board was presented only with an executive summary, i.e., not with the complete FEIR pursuant to CEQA Guidelines § 15132, the Board voted 12-0 to approve the Project and certify the FEIR, as shown in this screenshot from the tape of the April 25, 2024 Board meeting:



As specified in CEQA Guidelines § 15025 – Delegation or Responsibilities: “(b) **The decision-making body of a public agency shall not delegate the following functions: (1) Reviewing and considering a final EIR or approving a Negative Declaration prior to approving a project. (2) The making of findings as required by Sections 15091 and 15093.**” (Emphasis added.)

The Metro Board thus inappropriately delegated review of both the DEIR and FEIR to staff. Certification of the FEIR is invalid and must be rescinded, along with the April 29, 2024 NOD, on this further ground.

D. Demand to Cure and Correct Under the Brown Act.

The fundamental purpose of California’s Open Meeting Law, the Brown Act, is to give the public fair notice of proposed actions and a reasonable period of time to review the proposed action to determine whether to monitor the meeting or participate. The reasonable notice period is intended to enable the public to review the proposed action, prepare written comments, and/or prepare oral testimony.

Based on Metro’s actions and failures discussed above, the April 25, 2024 LPA, Project, and FEIR certification/approval and consequent April 29, 2024 NOD recordation must be invalidated/rescinded. The Planning and Programming Committee and full Board meetings to consider these matters as well as all other items regarding the Project must be re-noticed and reheard based upon proper advance notice of the hearings and actions, including specifically to Kramer and its representative, the undersigned. Under the Brown Act, demand is hereby made that Metro cure and correct its violations of

Los Angeles County Metropolitan Transportation Authority
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Page 10

Kramer's and other members of the public's rights by rescinding and properly re-noticing these hearings and events.

Pursuant to Govt. Code § 54960.2, this letter shall also be a demand to cease and desist Metro's practice of sending out false and/or misleading notices (e.g., Metro's March 29, 2024 letter; **Exhibit 1**) to members of the public that are intended to and/or do dissuade, confuse, deter or otherwise prejudice members of the public from having adequate and proper notice of votes, approvals, meetings, hearings and similar events, particularly those that directly impact property owners' due process, public participation, real property and other rights.

III. CONCLUSION.

If Metro does not provide written notice to this office on or before **May 22, 2024** of its rescissions of the Project, LPA, and FEIR certification and recordation of the NOD, Kramer will pursue all legal remedies available to it to set aside those Metro actions, including filing a petition for writ of mandate and complaint for violation of its due process and other rights, and will further seek an award of its attorney fees and costs, including pursuant to the Private Attorney General Statute, Code Civ. Proc. § 1021.5, and Federal Civil Rights Law, 42 U.S.C. § 1988.

Thank you for your prompt attention to this matter.

Very truly yours,

/s/ Robert P. Silverstein
ROBERT P. SILVERSTEIN
FOR
THE SILVERSTEIN LAW FIRM, APC

RPS:ek
Encl.

EXHIBIT 1



Metro

Los Angeles County
Metropolitan Transportation Authority

One Gateway Plaza
Los Angeles, CA 90012-2952

213.922.2000 Tel
metro.net

March 29, 2024

RE: Final Environmental Impact Statement/Environmental Impact Report (EIS/EIR) for the West Santa Ana Branch Transit Corridor Project (now Southeast Gateway Line) Notice of Availability

To Whom It May Concern:

The Los Angeles County Metropolitan Transportation Authority (LACMTA) completed and released the Final EIS/EIR for the Southeast Gateway Line (previously called West Santa Ana Branch Transit Corridor Project¹ (Project) on March 29, 2024. The Final EIS/EIR describes and evaluates the environmental effects of the Locally Preferred Alternative (LPA). The Final EIS/EIR also includes responses to public comments received on the Draft EIS/EIR, which was circulated for public review/comment from July through September 2021.

In January 2022, the Metro Board of Directors identified the LPA for the Southeast Gateway Line, a 14.5-mile light rail transit (LRT) line with 9 stations from a northern terminus at the Slauson/A Line Station located in the City of Los Angeles/Florence-Firestone unincorporated community of LA County to a southern terminus at the Pioneer Station located in the City of Artesia. The LPA includes a new C Line infill station at I-105, 5 parking facilities and a Maintenance and Storage Facility (MSF) in the City of Bellflower. This project would connect Artesia, Cerritos, Bellflower, Paramount, Downey, South Gate, Cudahy, Bell, Huntington Park, Vernon, unincorporated Florence-Firestone and LA County. Connecting this area to Metro's rail network (i.e., C Line to LAX and A Line to LA Union Station and Azusa) will provide alternatives to driving and create more access to opportunity.

The Board also identified Los Angeles Union Station (LAUS) as the ultimate northern terminus for the corridor. Staff are conducting a separate study to evaluate options for connecting from Slauson/A Line to LAUS.

The project area is home to 1.4 million residents and is an industrial employment hub with approximately 618,500 jobs. Population and jobs are projected to grow to 1.6 million and 746,000 by 2042, respectively. Population and employment densities in areas around the project are five times higher than the LA County average. There is a high concentration of minority communities residing in the Project Study Area including a significant concentration of minority residents comprising 65 percent of the total Study Area population, with Hispanic/Latino groups alone accounting for 51 percent of the total population. In addition, 44 percent of Study Area residents live below the poverty level, which is higher than the LA County average of 33 percent. The Project will provide residents with reliable transit service

¹ Metro launched a renaming campaign in August 2023 to get community input on a new name for the project that would represent the communities' character, culture and experience of the people who live, work and play in the cities this new line will serve. The Southeast Gateway Line was selected as the project name.

to access employment, health, and educational opportunities, which otherwise would be difficult to reach. This project will also address greenhouse gas emissions by reducing an anticipated 34 million vehicle miles traveled per year, the equivalent of 3.9 million gallons of gasoline, once in operation. Construction of this project will create approximately 54,700 person-year jobs (defined as one job for one person for one year) and result in an estimated \$9.6 billion in overall economic activity during the construction phase. Operation of this project will create approximately 250 person-year jobs and result in an estimated \$27.3 million in overall economic activity per year.

The purpose of this letter is to notify you that the LPA contained in the Final EIS/EIR identifies your property for potential impacts (i.e., either full, partial, permanent, or temporary acquisition).

The potential acquisitions and easements identified in the Final EIS/EIR are based on current design and the number or size of acquisitions and easements could decrease as design advances. Metro will continue to consider acquisitions and easements needed for the Project as design advances. If your parcel is required, the acquisition process is generally a 2-to-3-year process, following the completion of the Final EIS/EIR, requiring the following steps:

Acquisitions and Negotiation Process



Relocation Process



Section 4.3, Acquisitions and Displacements, of the Final EIS/EIR includes a discussion of the Project's need for properties and includes maps of the potentially **affected** properties. Appendix B, *Final Advanced Conceptual Design*, of the Final EIS/EIR includes the right-of-way drawings.

For your convenience, a USB flash drive card with the electronic copy of the Final EIS/EIR is included as part of this Notice of Availability (NOA) packet. If you have any difficulties with the USB flash drive, please contact Yvette Ximenez, Outreach Consultant, at YXimenez@arellanoassociates.com or 909.627.2974. The files are also located on our website, metro.net/sql. If you are unable to access the

files online or through the USB, printed copies are also available at the following locations along the corridor:

- Artesia Library, 18801 Elaine Ave, Artesia, CA 90701
- Clifton M. Brakensiek Library, 9945 Flower St, Bellflower, CA 90706
- Gateway Cities Council of Governments, 16401 Paramount Blvd, Paramount, CA 90723
- Paramount Park Community Center, 14400 Paramount Blvd, Paramount, CA 90723
- Hollydale Library, 12000 Garfield Ave, South Gate, CA 90280
- Huntington Park Library, 6518 Miles Ave, Huntington Park, CA 90255
- South Park Business Improvement District, 1150-B S Hope St, Los Angeles, CA 90015
- Arts District Business Improvement District, 1801 E 7th St, Los Angeles, CA 90021
- Los Angeles Central Library, 630 W 5th St, Los Angeles, CA 90071
- Little Tokyo Branch Library, 203 S Los Angeles St, Los Angeles, CA 90012
- Metro Headquarters – Dorothy Peyton Library, 15th Floor, One Gateway Plaza, Los Angeles, CA 90012

A 30-day public review period will conclude on **April 29, 2024**. Comments may be submitted by email to sgl@metro.net by this date to be considered in FTA's Record of Decision.

The Metro Board will consider certifying the Final EIR at a meeting in the coming months. Information on the meeting time can be found at the website above or by calling the project helpline at 213.922.6262.

With the Board's approval of the Project and certification of the Final EIR, Metro will file a Notice of Determination (NOD) with the State Clearinghouse to complete the CEQA process. It is anticipated that FTA staff will issue a Record of Decision (ROD) in Summer 2024, which will conclude the environmental document.

Sincerely,

Meghna Khanna

Meghna Khanna
Project Manager
Los Angeles County Metropolitan Transportation Authority (Metro)

From: Yvette Ximenez <YXimenez@arellanoassociates.com>
Sent: Monday, May 6, 2024 3:59 PM
To: Mauro Donate
Cc: West Santa Ana Branch Outreach Team
Subject: RE: Final Impact Statement - West Santa Ana Branch Transit Corridor Project

Hello Mauro,

The driveway identified by the property owner will require demolition to accommodate grade crossing equipment, such as crossing gates and signage for the Main Street at-grade crossing. Driveways and intersections near at-grade crossings that allow for vehicular movements within the at-grade crossing are not encouraged due to safety considerations. Under existing conditions, this driveway is approximately 28 feet from the mainline freight track and is located on the inside of the crossing gates (between the crossing gate and the track). With the shift of the freight tracks to the west that is proposed with the Project, the existing driveway would only be approximately 5 feet from the proposed freight track centerline, which would not meet design standards. The driveway would also still be located between the crossing gates and freight track, and given the distance there could be safety concerns if this driveway were maintained. Therefore, the driveway will not be reconstructed in order to eliminate this potential safety concern and accommodate grade crossing features. Note that the entrance on Center Street would be maintained. Additional coordination will occur with the property owner during the formal real estate acquisition process, which is scheduled to begin in summer 2024, as part of the design advancement.

Please let me know if you have any questions.

Thank you,



Yvette Ximenez
Deputy Project Manager
5851 Pine Avenue, Suite A | Chino Hills, CA 91709
P • 909.627.2974 | C • 323.384.6259
E • YXimenez@arellanoassociates.com
www.arellanoassociates.com



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From: Mauro Donate <mdhdonate@mdhboiler.com>
Sent: Wednesday, May 1, 2024 4:29 PM
To: Yvette Ximenez <YXimenez@arellanoassociates.com>
Subject: FW: Final Impact Statement - West Santa Ana Branch Transit Corridor Project

Hello Yvette,

We were finally able to review and make sense of the drawings provided for West Santa Ana Branch Transit Corridor Project. We are located at 12106 Center St. South Gate CA 90280 and noticed that our driveway is shown to be removed and not reconstructed. Who could we reach out to dispute this design/decision. Attached is the plan sheet showing the crossing.

Thank you,

Mauro Donate

MDH Burner and Boiler Company

12106 S. Center St.

South Gate, CA 90280

Office: (562) 630-2875

Cell: (562) 244-0935

Fax: (562) 630-2595

Email: mdonate@mdhboiler.com

Mike Patel
2680 Randolph St.
Huntington Park, CA 90255

May 10, 2024

Meghna Khanna
Los Angeles County Metropolitan Transportation Authority
One Gateway Plaza
Los Angeles, CA 90012

Subject: Request for Amendment of the Final EIS/EIR Documentation and Review by the Metro Board of Directors

Dear Meghna Khanna,

Following our recent conference call and the discussions regarding the eminent domain process, I am compelled to address a critical issue concerning the properties at 2672 and 2680 Randolph St., Huntington Park. It has come to my attention that the Final Environmental Impact Statement/Environmental Impact Report (EIS/EIR) may not accurately reflect the true nature of these properties as providers of long-term affordable housing.

****Correction of Property Classification:****

The properties have been misclassified as short-term stay facilities, whereas, in reality, they house permanent residents, some of whom have been living there for many years. This significant oversight has implications for the residents and the broader community, potentially leading to the displacement of numerous tenants who rely on this affordable housing.

****Request for EIS/EIR Amendment:****

Given the severity of this misclassification, I urge that the Final EIS/EIR be amended to correctly describe the properties as affordable housing units and to comprehensively assess the impact of displacing long-term tenants. It is crucial that the documentation accurately reflects the community's characteristics to ensure that all factors are considered in the decision-making process.

****Presentation to the Metro Board of Directors:****

Furthermore, I request that this corrected information and the proposed amendments to the EIS/EIR be presented to the Metro Board of Directors. It is essential that the board is fully informed of these critical aspects before making any decisions that will affect the lives of so many constituents.

****Ensuring Transparency and Fairness:****

The residents and owners of these properties deserve a transparent process that considers their livelihoods and the stability of their housing. Correcting the EIS/EIR and presenting this information to the board is a step towards rectifying the situation and fostering a fair process.

****Request for Individual Meetings:****

Given the stakes involved, Metro should have conducted individual meetings with each property owner to be affected by this project. These meetings should have aimed to gather input, discuss potential alternatives, and address the concerns of those directly impacted. Such dialogue was essential not only for maintaining trust but also for ensuring that all potential mitigation strategies are thoroughly explored.

I look forward to your acknowledgment of this request and to the swift action in amending the EIS/EIR documentation. Thank you for addressing this significant matter, and I hope for a resolution that prioritizes the well-being of our community members.

Sincerely,

Mike Patel
Mike_patel@cox.net

From: noreply@salesforce.com on behalf of communityrelations@metro.net
Sent: Friday, June 28, 2024 1:17 PM
To: elmervelizondo@hotmail.com
Subject: Thank you for your inquiry, Mr. Elizondo

Hello, Mr. Elizondo:

Thank you for contacting the Southeast Gateway Line team. The light-rail transit system will operate on separate tracks from the freight rail. Additionally, the Project will operate on tracks separate from the A Line. The design of the Slauson/A Line Station that will be constructed as part of the Project considers pedestrian access as well as transfers between the new station and the existing A Line station.

The West Santa Ana Branch Transit Corridor Project Slauson/A Line to LA Union Station Segment Study is underway and is evaluating cost-effective options for the approximately 4.5-mile segment along Alameda Street from LA Union Station to the Slauson/A Line Station.

Thank you,
Southeast Gateway Line team



From: noreply@salesforce.com on behalf of Yvette Ximenez
<YXimenez@arellanoassociates.com>
Sent: Wednesday, May 8, 2024 5:40 PM
To: elmervelizondo@hotmail.com; West Santa Ana Branch Outreach Team
Cc: sgl@metro.net
Subject: Thank you for your inquiry Elmer

Thank you for your comments on the Southeast Gateway Line. We appreciate your feedback. The 30-day waiting period ended on April 29th; staff will prepare a summary of comments (and corresponding responses) received during circulation of the Final EIS for FTA's consideration. We appreciate your involvement in this public process.

----- Original Message -----

From: Elmer Elizondo [elmervelizondo@hotmail.com]
Sent: 5/6/2024, 8:59 PM
To: sgl@metro.net
Subject: SOUTHEAST GATEWAY LINE - LOS ANGELES COUNTY

Dear Ms. Meghna Khanna, Project Manager.

I enjoyed your presentation and the features.

However, I would like to see an animation of the entire project in the near future.

One issue that I'm concerned is that environment of sharing the tracks with Union Pacific Rails. There are many children that can be impact the health of their wellness. Also of the senior citizens that resided on these communities. Sharing the tracks with the freight of the Union Pacific Rails will cause delays for the new Light Rail Transit.

Second, that the Blue Line (A) should have a single track from the new Light Rail Transit. It should not be sharing causing due to more traffic on the rail systems. It should run parallel from each other. I believe that the Slauson Station should be improve to access pedestrians and riders that are going to ride on a daily basis.

In conclusion, it would benefit that this project would extent to Los Angeles Union Station. This project it is great benefit for commuters who what to travel to Union Station.

From: noreply@salesforce.com on behalf of communityrelations@metro.net
Sent: Thursday, May 9, 2024 12:01 PM
To: darkbull517@gmail.com; West Santa Ana Branch Outreach Team
Subject: Thank you for your inquiry richard

Hello Richard,

Construction is expected to start in 2026 with the forecasted opening in 2035.

Thank you,
Metro Community Relations

----- Original Message -----

From: richard garcia [darkbull517@gmail.com]
Sent: 5/6/2024, 9:56 AM
To: communityrelations@metro.net
Subject: RAIL LINE

Hello,

I just want to know when you'll start building the Rail Line. Which you don't say in the email or the website.

Will you start construction in 2024 or 2025?

Richard

On Mon, May 6, 2024 at 9:49?AM [<communityrelations@metro.net>](mailto:communityrelations@metro.net) wrote:

Hi Richard, thank you for your email. Below is the status of the project. The project is forecast to open in 2035.

On Thursday, April 25, 2024, the Project's Final Environmental Impact Report (EIR) went before the Metro Board of Directors and was certified in accordance with the California Environmental Quality Act (CEQA). The Project will feature the following:

- 14.5 miles of new light rail connecting from Slauson/A Line Station in the City of Los Angeles/Florence-Firestone unincorporated area of LA County to its southern terminus at the Pioneer Station located in the City of Artesia
- 9 SGL stations, and a new C Line infill station at the I-105 Freeway
- 5 parking facilities (4 surface parking lots and 1 parking garage at Pioneer Station)
- Ancillary facilities and a Maintenance and Storage Facility (MSF) in the City of Bellflower
- The design option would close 186th Street but keep 187th Street open in the City of Artesia.

Next, the Federal Transit Administration (FTA) will issue a Record of Decision (ROD) in summer 2024 following the 30-day waiting period that ended on April 29th since the publication of the Final EIS on March 29th.

You can visit the project's [website](#) to stay up to date with the project.

Metro Community Relations

----- Original Message -----

From: richard garcia [darkbull517@gmail.com]

Sent: 5/3/2024, 6:08 PM

To: sgl@metro.net

Subject: RAIL LINE

Hello,

When will you start construction on the Rail Line from Artesia to DTLA? Will it be ready for the Olympics 2028?

Richard
An Bellflower Resident

