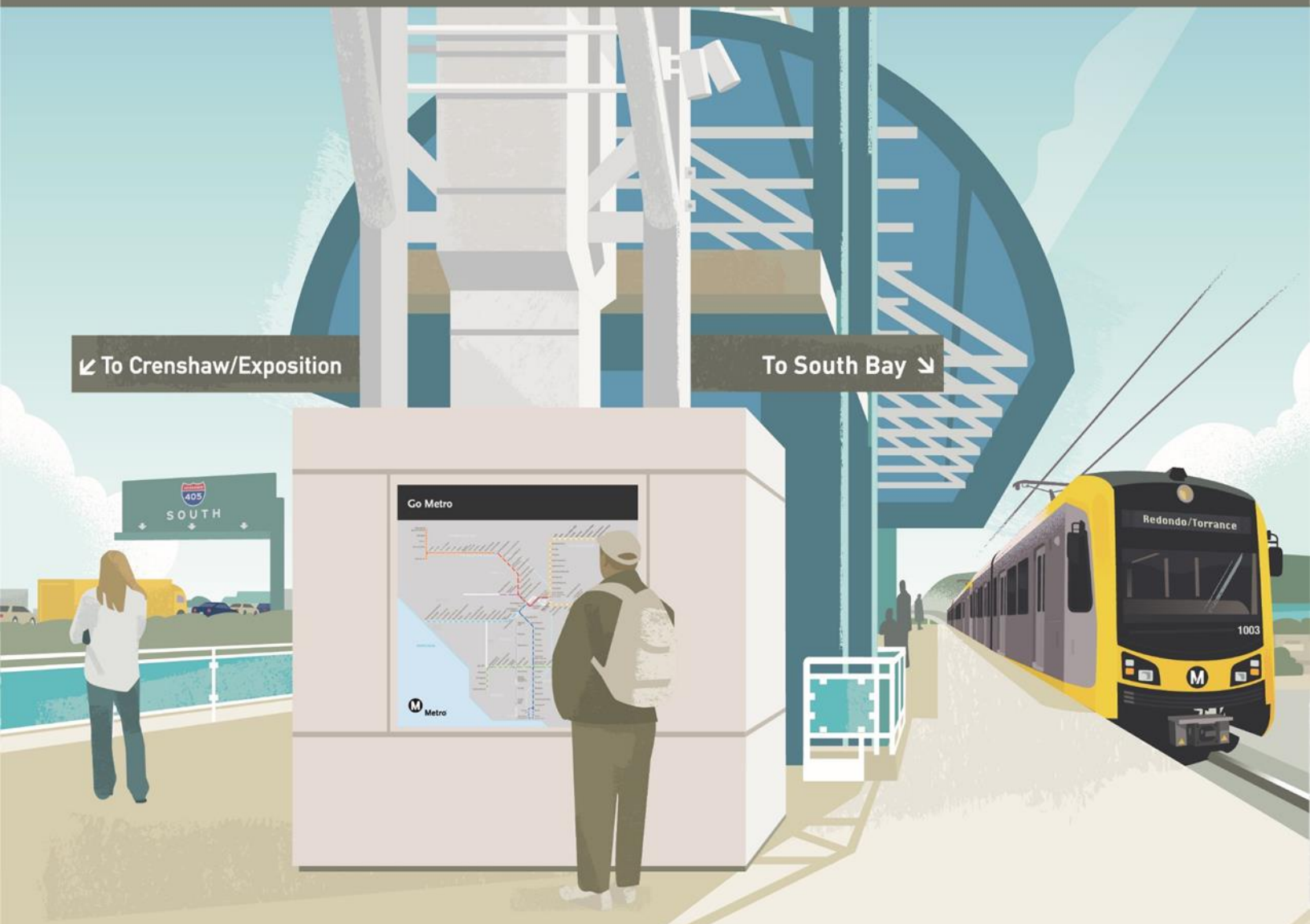
Los Angeles County
Metropolitan Transportation Authority

Final Environmental Impact Report

September 2025

C LINE (GREEN) EXTENSION TO TORRANCE



Metro

C Line (Green) Extension to Torrance

Final Environmental Impact Report

September 2025

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ES EXECUTIVE SUMMARY

ES.1 INTRODUCTION

The Executive Summary provides an overview of this Final Environmental Impact Report (EIR) for the C Line (Green) Extension to Torrance, which has been prepared in compliance with the California Environmental Quality Act (CEQA) (Pub. Resources Code, § 21000 et seq.) and the State CEQA Guidelines (14 Cal. Code. Regs., § 15000 et seq.). This Final EIR responds to comments received on the Draft EIR during the public comment period and incorporates revisions and clarifications where appropriate.

The project would extend the C Line (Green) from the existing Redondo Beach (Marine) Station to the Mary K. Giordano Regional Transit Center (Torrance TC) for approximately 4.5 miles and provide two new rail stations. The project is officially referred to as the C Line Extension to Torrance Project, though due to recent service changes, the project would now function as an extension of the K Line. Specifically, on June 6, 2025 (subsequent to the completion of the Draft EIR), Metro implemented service changes that redirected the C Line to terminate at the LAX/Metro Transit Center, with the K Line assuming operations along the C Line's former west segment, continuing south from the Aviation/Century Station to the Redondo Beach (Marine) Station. As a result, the segment proposed for extension would be part of the K Line's operational alignment, although the project's official name remains unchanged. Importantly, this change does not alter the adequacy of how the proposed alignment options and alternatives were studied in the Draft EIR, as the project was and still is proposed to include extension of light rail transit service from the existing Redondo Beach (Marine) Metro K Line (formerly C Line) Station to the Torrance TC.

After completion of the Final EIR, the Metro Board may certify the Final EIR, adopt a Mitigation Monitoring and Reporting Program (MMRP) for the project, issue findings of fact on the project's environmental impacts, adopt a statement of overriding considerations, and approve the project.

ES.1-1 Background

The project has evolved over the years based on several planning studies and the scoping process, which are discussed in greater detail in the Alternatives Considered and Eliminated Report (Metro, 2023). Metro completed an Alternatives Analysis (AA) Study in 2009, which studied transit alternatives along the Metro-owned Harbor Subdivision freight railroad right-of-way (Metro ROW) between downtown Los Angeles (LA), Los Angeles International Airport (LAX), and the Ports of Los Angeles and Long Beach. In 2010, Metro initiated a Draft EIS/EIR, but it was put on pause in 2012 due to funding concerns. Following the passage of Measure M in 2016, which provides additional funding for the project, in 2017, Metro reinitiated the project studies with the Supplemental Alternatives Analysis (SAA) that focused on further refining the previously identified alternatives based on feedback from stakeholders. On September 27, 2018, the Metro Board of Directors (Metro Board) voted to approve two alternatives to be carried forward into environmental analysis: the Metro ROW and the Hawthorne Boulevard alignment (both primarily at-grade alignments).

ES.1-2 Environmental Review Process

On January 29, 2021, Metro published a Notice of Preparation (NOP) to solicit public and agency comments on the scope, content, and information that should be considered as part of the Draft EIR for the proposed light rail that would extend approximately 4.5 miles from the end of the existing Metro C Line in Redondo Beach southeast to Torrance. Metro held an agency-specific scoping meeting and two public scoping meetings on February 24 and 27 during a 60-day comment period, which ended on March

29, 2021. All scoping meetings were held virtually due to Los Angeles (LA) County Safer at Home orders during the COVID-19 pandemic.

Following the public scoping review period and NOP release, Metro began developing the Draft EIR. A variety of potential alternatives that satisfy the project's purpose and need were assessed and refined during the screening and project refinement stages of the Draft EIR process. The Draft EIR identified and evaluated the Elevated/At-Grade Alignment as the Proposed Project, as well as two options: the Trench Option and Hawthorne Option. In accordance with CEQA guidelines Section 15126.6(a), the Draft EIR also included three Project Alternatives: No Project Alternative, High Frequency Bus Alternative, and 170th/182nd Grade-Separated Light Rail Transit Alternative (also referred to as the Hybrid Alternative).

Upon release of the Notice of Availability (NOA) on January 26, 2023, a 61-day comment period was initiated for public review and comment on the Draft EIR. During the public comment period, Metro conducted five public hearings, held during the weekday, weekend, and virtually. The public was able to provide comments regarding the content and conclusions of the Draft EIR. Approximately 400 stakeholders attended the public hearings. Additionally, information about the project was distributed through the following methods: 32,000 flyers delivered door-to-door; 47,231 postcards mailed; legal advertisements and display notices published in four newspapers; ads displayed on South Bay Metro bus lines; nine email blasts distributed; a blog post published in Metro's *The Source;* four surveys conducted in transit bus-stop intercept locations; and 250 businesses engaged in door-to-door outreach. Metro received approximately 2,200 comment submissions in the form of emails, voicemails, oral comments at public hearings, comment cards, letters, surveys, and petitions during the comment period (see Appendix C, Public Comments on the Draft EIR).

Following the completion of the Draft EIR public comment period, Metro and Director Holly J. Mitchell's office (LA County Supervisor of the second district) hosted additional community engagement. This included a community walk in the City of Lawndale along the proposed light rail alignments on December 16, 2023, and a community meeting on January 18, 2024 at Springhaven Apartments in Willowbrook near the Rosa Parks/Willowbrook Station, served by the Metro C and A Lines. Community members shared input on the project at these events, which was summarized and shared with the Metro Board prior to the selection of a Locally Preferred Alternative (LPA). See Appendix A for a summary of public engagement.

ES.1-3 Selection of LPA

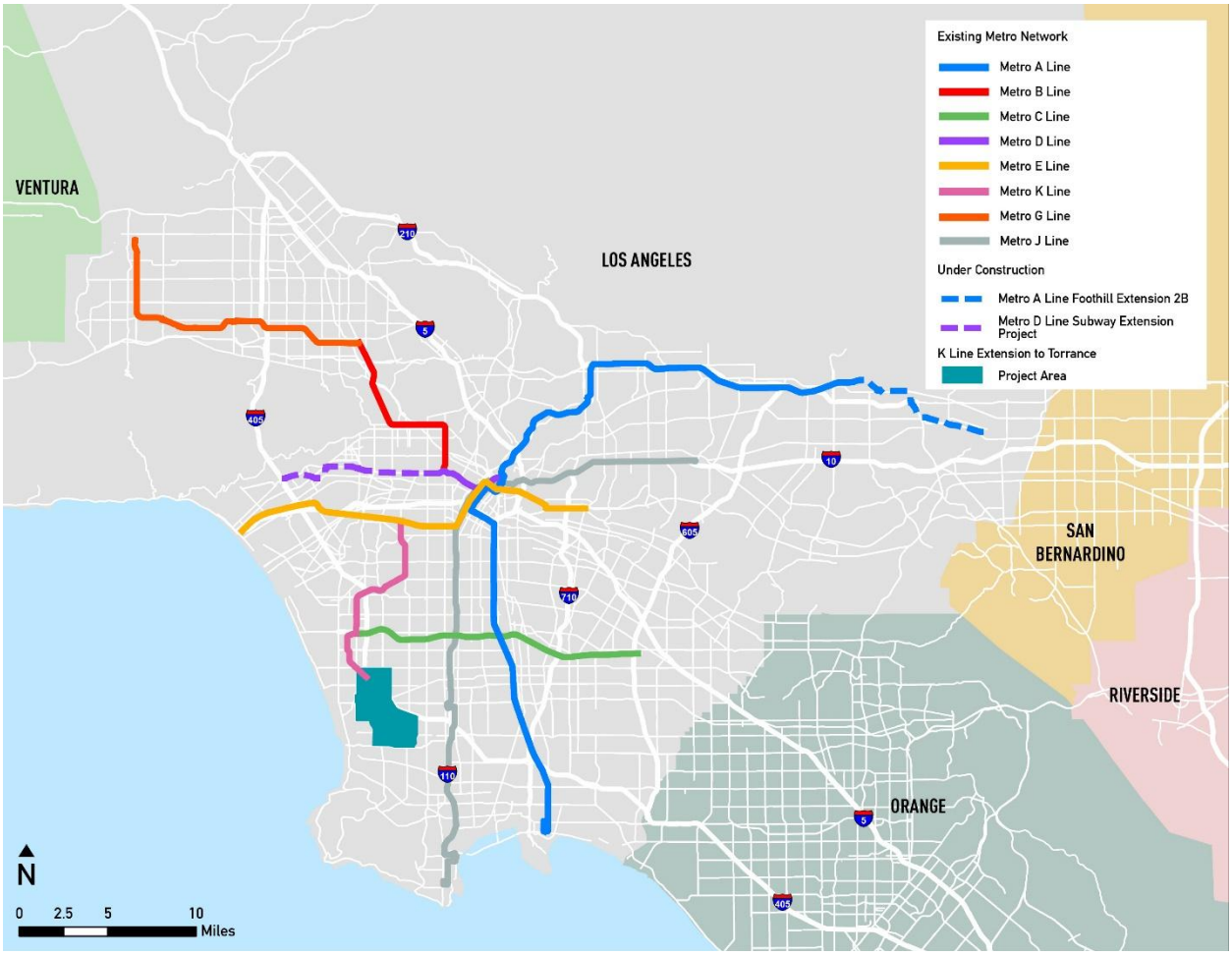
Based on the Draft EIR and supporting technical studies, comments on the Draft EIR, stakeholder input and additional community engagement in partnership with Director Mitchell, Metro staff recommended the 170th/182nd Grade-Separated Light Rail Transit Alternative (Hybrid Alternative) as the LPA since it best provides local and regional benefits, meets project needs and objectives, and addresses community concerns. Metro presented the staff recommendation to the Metro Planning & Programming Committee in April 2024 and the full Metro Board in May 2024. Both meetings allowed for public comment. At the May 23, 2024 Board meeting, the Metro Board selected the Hybrid Alternative as the LPA to be evaluated in the Final EIR.

ES.2 PROJECT DESCRIPTION

Figure ES-1 shows the project location within LA County. The project historically has been envisioned as an extension of the existing Metro C Line (Green) and therefore the Draft EIR published in January 2023,

and this document refers to it as the C Line Extension. However, due to recent service changes, the project would now function as an extension of the K Line. Specifically, on June 6, 2025 (subsequent to the completion of the Draft EIR), Metro implemented service changes that redirected the C Line to terminate at the LAX/Metro Transit Center, with the K Line assuming operations along the C Line's former west segment from the Aviation/Century Station traveling south to the Redondo Beach (Marine) Station. As a result, the segment proposed for extension would be part of the K Line's operational alignment, although the project's official name remains unchanged. This change in system operations does not change the anticipated number of trains, their operations throughout the course of a typical day, maintenance schedules or facility needs, or infrastructure needs.

Figure ES-1. Project Location and Regional Vicinity



Source: Metro, STV, 2025

ES.2-1 Project Objectives

The underlying purpose of the project is to provide high-capacity transit service in the South Bay. Metro has identified the following project objectives:

> Improve mobility within the South Bay and encourage mode shift by:

- Introducing high-frequency transit service options from the current C Line terminus south to Torrance.

- Creating direct connections between the regional transit network and local transit hubs for convenient transfers.
- Providing an alternative mode of transportation for commuters traveling along congested arterials and Interstate 405 (I-405).
- Providing First-Last Mile facilities to connect neighborhoods to station areas.

> Reduce air pollution and greenhouse gas emissions by making transit a more viable transportation choice.

> Avoid and minimize environmental impacts on environmental resources to the maximum extent feasible.

> Provide a cost-effective project.

> Provide more equitable access to regional destinations by improving connections to the Metro regional rail system.

ES.2-1.1 Project Alignments, Options & Alternatives Studied in the Draft EIR

The project was analyzed in the Draft EIR with the following design options:

> Elevated/At-Grade Alignment (referred to as the Proposed Project in the Draft EIR) – Follows the Metro ROW for the length of the project from the existing Redondo Beach (Marine) Station to the Torrance TC, with an elevated segment, followed by an at-grade segment. An elevated station is located along the Metro ROW adjacent to the Redondo Beach Transit Center (Redondo Beach TC).

> Trench Option – Follows the Metro ROW for the length of the project, with a below-grade trench segment between Inglewood Avenue and 170th Street, followed by at-grade segments with a short trench to cross under 182nd Street. A one-level station is located along the Metro ROW adjacent to the Redondo Beach TC.

> Hawthorne Option – Leaves the Metro ROW to run in an elevated guideway along I-405 and turns onto Hawthorne Boulevard near 162nd Street to travel in the center median of Hawthorne Boulevard before rejoining the Metro ROW south of 190th Street. An elevated station would be located in the median of Hawthorne Boulevard, adjacent to the South Bay Galleria.

South of 190th Street, there were no design options, and all alignments followed the Metro/BNSF ROW in the same configuration, primarily at-grade with a terminus station at the Torrance TC.

The Draft EIR evaluated three alternatives to the Project under CEQA in accordance with CEQA guidelines Section 15126.6(a) to avoid or minimize impacts:

> No Project Alternative

> High-Frequency Bus Alternative

> 170th/182nd Grade-Separated Light Rail Transit Alternative (Hybrid Alternative and LPA).

ES.2-2 Locally Preferred Alternative

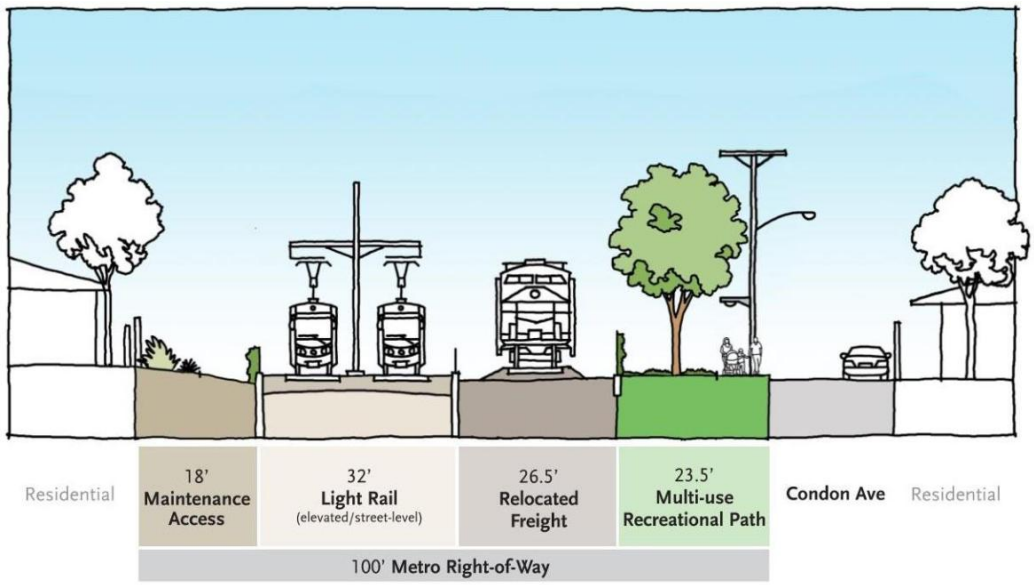
The LPA would extend the Metro light rail approximately 4.5 miles to the south along the existing Metro ROW for the length of the alignment. Two new light rail transit stations are proposed: the Redondo Beach TC Station and the Torrance TC Station. Figure ES-7 shows an overview of the LPA. BNSF operates freight service along the Metro ROW in the project area. As part of the LPA, Metro proposes

constructing two new light rail tracks and relocating the existing freight tracks in certain areas within the Metro ROW. The LPA also includes multi-use recreational paths within the Metro ROW, where there is sufficient room, in the cities of Lawndale and Redondo Beach as discussed further below. South of 190th Street, BNSF and Metro share ownership of the freight corridor and BNSF has several spur tracks to serve adjacent businesses. Metro owns approximately 15 feet in width and would acquire or lease additional ROW from BNSF to accommodate two new light rail tracks between 190th Street and the Torrance TC Station, while ensuring BNSF can maintain freight operations and deliveries via spur lines.

ES.2-3 Locally Preferred Alternative Alignment and Stations

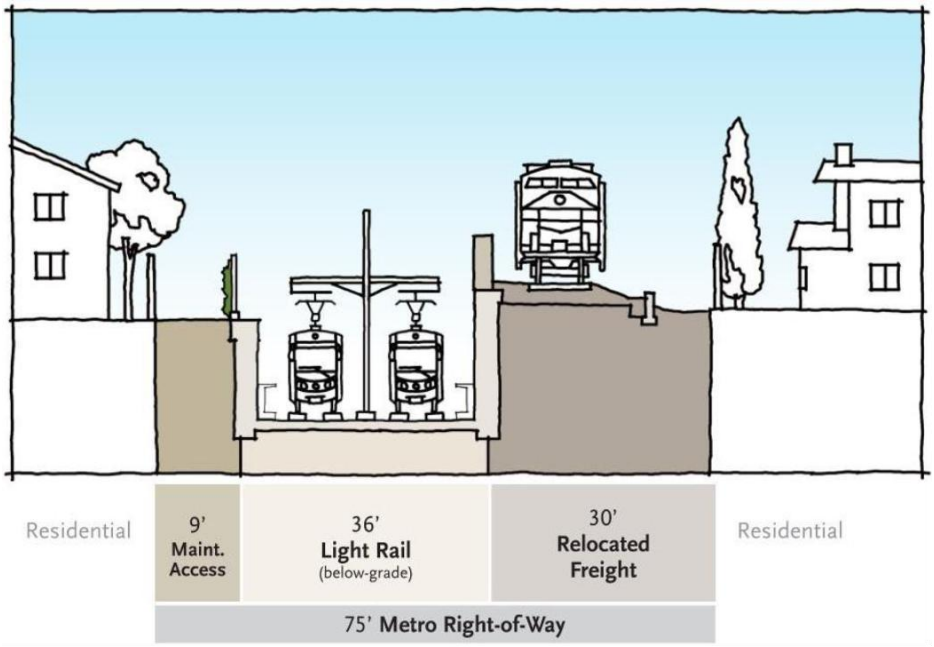
The LPA would begin at the existing elevated Redondo Beach (Marine) Station and continue south within the Metro ROW. The elevated alignment would continue about 400 feet south of the station before briefly descending to at-grade to avoid conflicts with overhead power lines before ascending to cross over Inglewood Avenue and Manhattan Beach Boulevard. South of Manhattan Beach Boulevard, the light rail would shift from the west side of the Metro ROW to the east side and cross 159th to 162nd Streets on an elevated structure before descending to street level near 165th Street, shown in Figure ES-2. Near 168th Street, the light rail would transition into an open-air trench to cross under 170th Street (Figure ES-3), then ascend to travel at-grade near 172nd Street and continue south into Redondo Beach. Between 170th Street and Artesia Boulevard, the Metro ROW narrows from 100 feet to 75 feet.

Figure ES-2. Locally Preferred Alternative – Looking South between 165th Street and 168th Street



Source: Cityworks Design, 2025
Dimensions are preliminary and subject to refinement in future phases of design.
Corresponds with Cross-Section H in Appendix B.

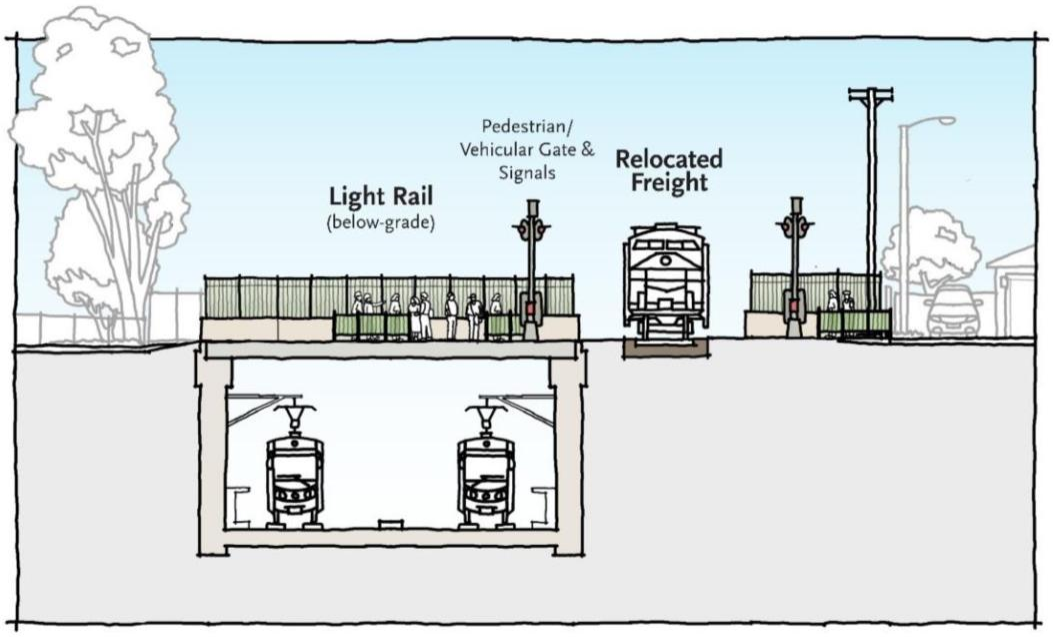
Figure ES-3. Locally Preferred Alternative – Looking South of 170th Street



Source: Cityworks Design, 2025
Dimensions are preliminary and subject to refinement in future phases of design.
Corresponds with Cross-Section H.2 in Appendix B.

The alignment would cross over Artesia Blvd and Grant Avenue on new light rail bridges parallel to the existing freight bridges. In this segment, the Metro ROW is 100 feet wide; the freight tracks would remain in place, and the light rail would travel parallel to freight. South of Grant Avenue, the alignment would approach the Redondo Beach TC Station, then descend into a short trench to cross under 182nd Street, as shown in Figure ES-4.

Figure ES-4. Locally Preferred Alternative – Looking South at 182nd Street



Source: Cityworks Design, 2025
Corresponds with Cross-Section M in Appendix B.

South of 182nd Street, the light rail would ascend to at-grade to cross over Hawthorne Boulevard and 190th Street on new bridges parallel to existing freight bridges. South of 190th Street, the alignment would cross under Prairie Avenue, then rise to an elevated structure to allow freight movement below, before descending again to travel at-grade and cross under Del Amo Boulevard. The alignment would continue at-grade before terminating at a new station adjacent to the Torrance TC.

The LPA's light rail tracks would be grade-separated from all roadways that currently cross the Metro ROW. The freight tracks would remain at-grade throughout the length of the corridor where they currently travel at-grade, and would shift in some locations within the Metro ROW to accommodate the light rail tracks. All eight existing at-grade freight crossings from Inglewood Avenue to 182nd Street would be upgraded with safety infrastructure to be quiet-zone ready, which would allow local jurisdictions to implement a quiet zone policy for the corridor in the future. This would eliminate the need for freight trains to use their horn as they approach street crossings and reduce noise along the corridor.

The LPA would provide multi-use recreational paths for walking, cycling, etc. to enhance mobility and access within the neighborhoods and to stations, where feasible. In Lawndale, a multi-use path is proposed between 159th Street and Manhattan Beach Boulevard east of the Metro ROW and Manhattan Beach Boulevard and 170th Street west of the Metro ROW. In Redondo Beach, a multi-use path is proposed between Grant Avenue and 182nd Street west of the Metro ROW.

The following stations would be constructed under the LPA:

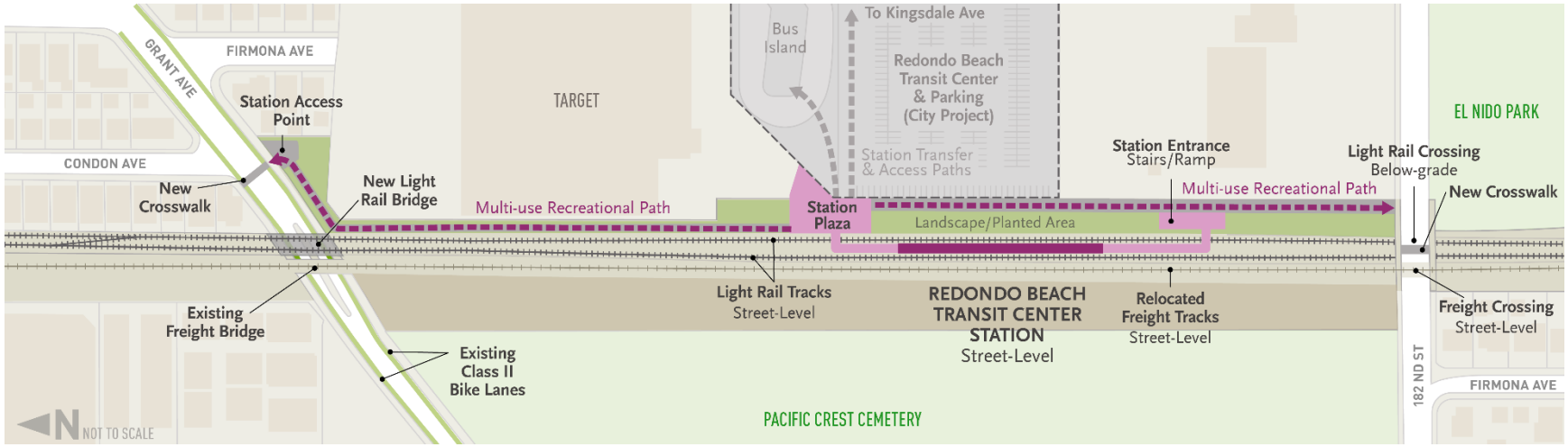
> Redondo Beach TC Station: The one-level Redondo Beach TC Station, shown in Figure ES-5, would be located south of Grant Avenue, west of the City of Redondo Beach's transit center with the platform

located approximately 10 feet below the existing ground level. Light rail riders would connect to a station plaza via pedestrian pathways, ramps, and stairs to access the adjacent city's transit center. Access to the station would be enhanced with a multi-use path connecting the station between Grant Avenue and 182nd Street.

> Torrance TC Station: The at-grade Torrance TC Station, shown in Figure ES-6, would be located northwest of Crenshaw Boulevard and west of the City of Torrance's bus transit center. The light rail station would be accessible by pedestrian pathways and crosswalks from the Torrance TC bus plaza and parking areas. This would be the southern terminus station.

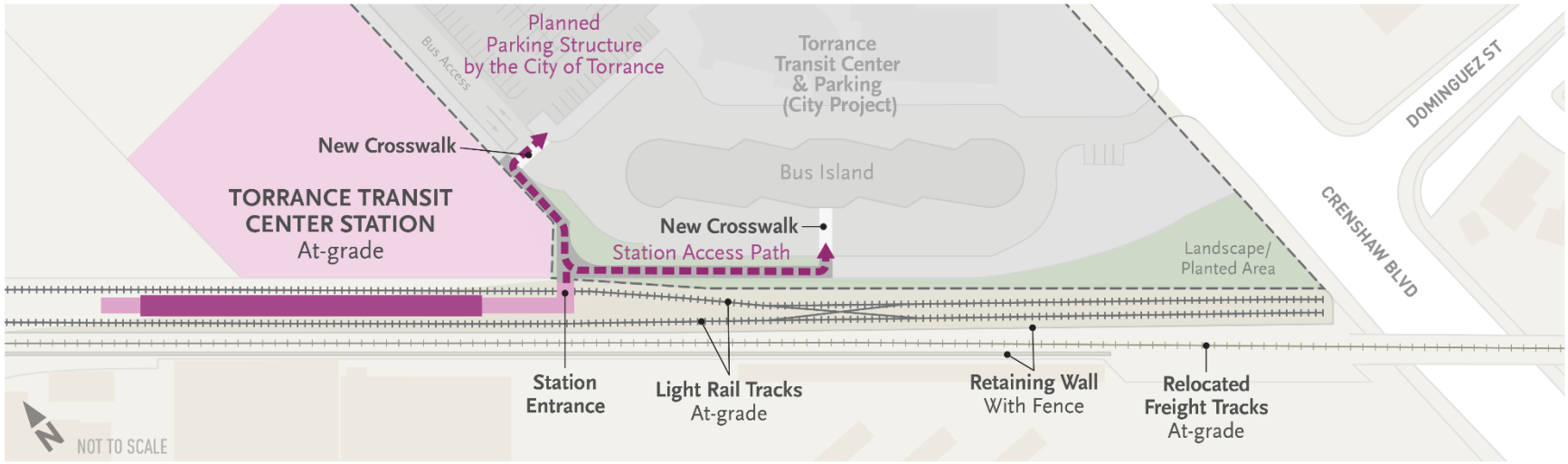
Detailed drawings of the LPA are provided in Appendix B, Select Advanced Conceptual Engineering Drawings - Locally Preferred Alternative, of this Final EIR. An overview of the LPA is shown in Figure ES-7.

Figure ES-5. Locally Preferred Alternative – Redondo Beach TC Station Layout



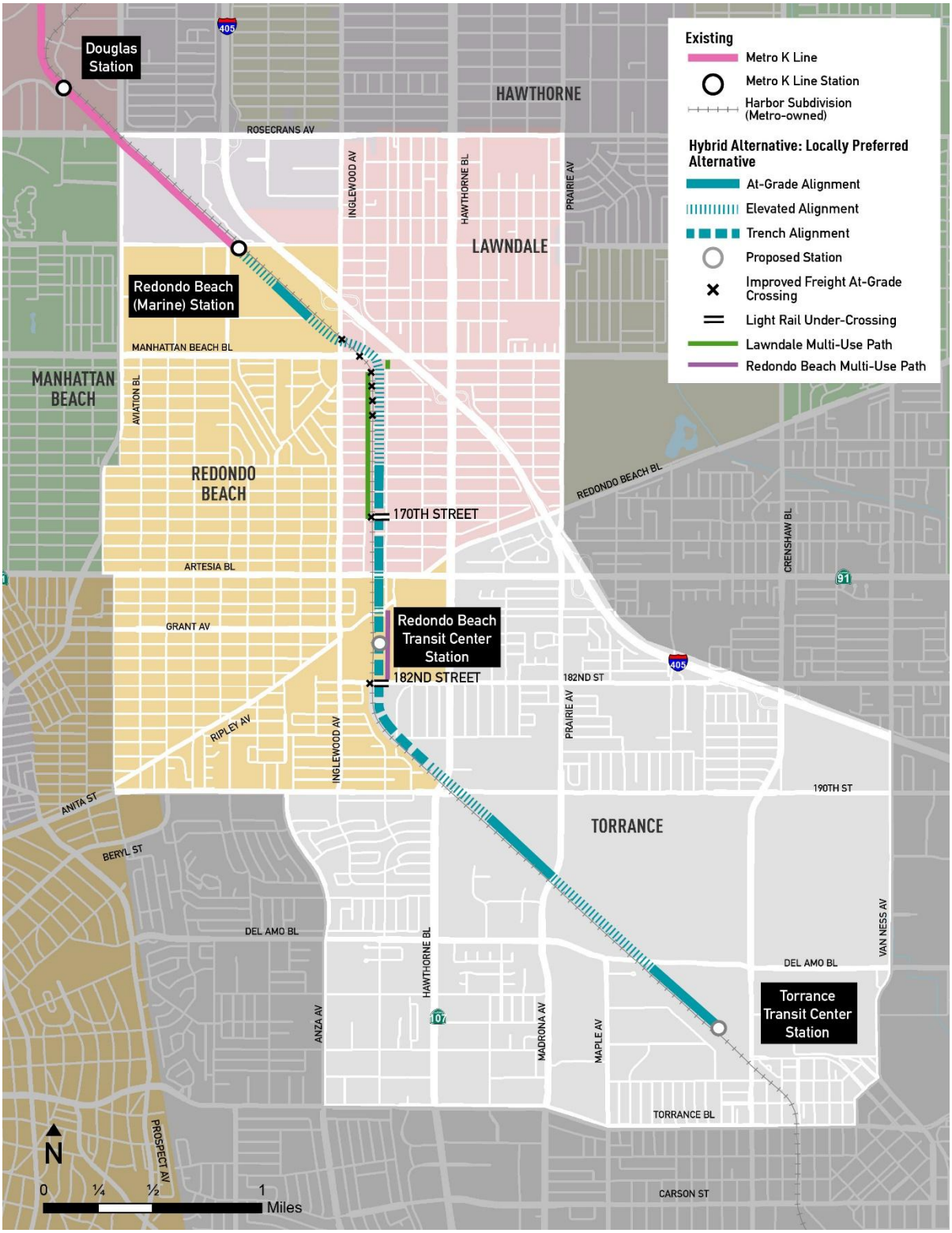
Source: Cityworks Design, 2025
Not to scale

Figure ES-6. Locally Preferred Alternative – Torrance TC Station Layout



Source: Cityworks Design, 2025
Not to scale

Figure ES-7. Locally Preferred Alternative – Overview



Source: STV, 2025

ES.2-4 System Components and Ancillary Facilities

The light rail system components would adhere to the Metro Rail Design Criteria and would use a similar design as used on existing Metro light rail lines. The LPA would require an overhead contact system (OCS), traction power substations (TPSS), and communications and signaling buildings. The OCS poles would be located every 90 to 170 feet apart, and in some locations, the poles would be located on both sides of the track. The TPSSs would be spaced approximately one mile apart along the alignment and require 4,800 square feet of land. Six TPSSs would be needed for the LPA. Communications and signaling buildings would contain train control and communications equipment, which would require approximately 500 square feet and 100 square feet, respectively.

An additional five light rail vehicles would need to be added to Metro's fleet to operate the LPA. The light rail vehicles would be serviced, maintained, and stored at the existing Division 16 Southwestern Yard in the City of Los Angeles or the El Segundo Yard Division 22 in the City of Hawthorne.

ES.2-5 Construction, Operations, and Permit Requirements for the LPA

ES.2-5.1 Construction

The major construction activities include clearing and demolition of existing structures; utility relocations; embankment work; freight track at-grade street crossings; bridges and elevated structures; trenches; retaining walls; stations; railroad and light rail track; and systems construction.

Construction of the LPA is anticipated to last approximately six years, which is longer than the estimated timeframe in the Draft EIR for Elevated/At-Grade Alignment in order to construct two trenches at 170th Street and 182nd Street and shorter than the Trench Option, which has more extensive trenches. Construction activities would primarily occur during daytime hours on weekdays, although some night construction may be required at times to avoid congested freeways and surface streets or due to the nature of certain construction processes, such as the construction of freight tracks to avoid disruption to BNSF operations or the construction of bridges over major arterials. The construction equipment that would be used for the LPA is typical of that found engaged in contemporary highway, building, bridge, and utility work, plus some specialized railroad track and OCS construction equipment. All equipment would conform to current applicable safety and environmental regulations. Off-site construction staging locations would be for temporary use during construction for the laydown of tools, materials, equipment, and vehicles.

ES.2-5.2 Construction Staging and Acquisitions

Construction would be primarily staged within the Metro ROW. Metro has designed the project to avoid displacement of residents. North of 190th Street, the LPA would have limited permanent property acquisitions for non-residential properties to locate the TPSSs. South of 190th Street, the LPA would require partial permanent property acquisitions for non-residential properties along the Metro ROW to build the light rail tracks and accommodate multiple relocated or new freight tracks, storage tracks, spurs, and access roads. For any properties that may have existing contamination, Metro would conduct a Phase II site investigation and implement remediation as needed. Additional details are provided in Section 3.9, Hazards and Hazardous Materials, of the Draft EIR and in Chapter 4, Corrections and Additions, of this Final EIR. The LPA would also include potential off-site locations for temporary use during construction for the laydown of tools, materials, equipment, and vehicles, as well as temporary construction easements. Temporary easements, as well as permanent real estate needs, are identified

in Appendix B, Select Advanced Conceptual Engineering Drawings - Locally Preferred Alternative, of this Final EIR.

ES.2-5.3 Operations

The operating hours and schedules would be comparable to the other operating patterns of Metro's current rail lines. The proposed hours of operation are 4:00 a.m. to 1:00 a.m. On weekdays, trains would operate during early morning hours from 4:00 a.m. to 6:00 a.m. and late-night hours from 7:00 p.m. to 1:00 a.m. every 15 minutes. On weekdays, trains would operate every five minutes during peak travel hours, which are typically during the commuting periods. Weekend system headways would be reduced compared to weekdays due to reduced commuter demand.

ES.2-5.4 Project Features

As a part of the LPA, several project features would be implemented during construction or included in the project design plans to ensure compliance with applicable laws, guidelines, and agency guidelines. These project features include design elements, best management practices, and other measures that are either required by law, permit conditions, or approvals from federal, state, regional or local agencies or that reflect industry best practices in transit construction and operations. Unlike CEQA mitigation measures, which are adopted to reduce or avoid significant environmental impacts identified in the EIR, project features are incorporated into the project as standard components of its design and implementation. The project features are described further in each respective section within Chapter 3, as well as in Appendix 2-C, Project Features in the Draft EIR, and Chapter 4, Corrections and Additions, of this Final EIR.

ES.2-5.5 Required Permits and Approvals

Construction and implementation of the LPA would require permits and approvals from responsible agencies such as the City of Lawndale, City of Redondo Beach, and the City of Torrance, and other departments and owners with jurisdiction over protected resources. Metro will comply with all applicable federal, state, and local environmental regulations and will responsibly mitigate significant environmental impacts resulting from the LPA in accordance with Metro policies and applicable laws. The anticipated permits and approvals are listed in Table ES-1.

Table ES-1. Permits and Approvals

Agency/Jurisdiction		Permit/Approval Required
State	California Department of Transportation	Approvals for modifications to Caltrans lease agreement (Artesia Boulevard and Hawthorne Boulevard bridges)
	State Department of Toxic Substances Control	Hazardous materials cleanup
	State Water Resources Control Board	Construction General Permit and SWPPP
		NPDES Dewatering Permit
		LA County MS4 NPDES Package
	California Public Utilities Commission	Grade separations, crossings, state safety oversight
	California Department of Fish and Wildlife	Consultation on protected species
Regional	Metro Board	Certification of the Final EIR, adoption of CEQA Findings, a Statement of Overriding Considerations, and Mitigation Monitoring and Reporting Program, and approval of the project
	Regional Water Quality Control Board	Construction General Permit and SWPPP
	Southern California Edison	Permits for utility relocation
	LA County Department of Public Works	Permits for utility relocation
	LA County Fire Department	Discretionary actions
	BNSF Railroad	Approval of track relocations
Local	City of Lawndale City of Redondo Beach City of Torrance	Permits (traffic, street use, lighting, landscape, building demolition)[1]
	Redondo Beach Fire Department Torrance Fire Department	Discretionary actions

Caltrans = California Department of Transportation

[1]Necessary permits from the cities of Lawndale, Redondo Beach, and Torrance include only those related to work within the cities' rights-of-way. Metro would not require local permits for activities within the Metro ROW.

ES.3 DESIGN REFINEMENTS

Following the action of the Metro Board and receipt and review of public comments on the Draft EIR, the conceptual engineering of the project has continued to progress. The following design refinements were made after circulation of the Draft EIR and include minor adjustments to the alignments, support structure design, construction staging areas, and optional locations for light rail support facilities. These refinements were made to enhance compliance with design or environmental requirements and to respond to comments received on the Draft EIR.

The design refinements are discussed further in Chapter 3, Design Refinements, which includes an evaluation of the refinements and determines that the refinements would *not* result in any new significant environmental impact or change the intensity of the impacts disclosed in the Draft EIR.

The design refinements apply to all rail alignments studied in the Draft EIR, unless otherwise noted, as shown in Table ES-2.

Table ES-2. Design Refinements since the Draft EIR Publication

ID	Location	City/ Jurisdiction	Reason for Refinement	Description of Refinement	Reference
1	Private Property: South of the Redondo Beach (Marine) Station, north of Santa Fe Avenue, west of Metro ROW	Redondo Beach	Based on further analysis of power needs and site access, an additional optional location for a Traction Power Substation (TPSS) was identified at the north end of the project. The new option would provide greater flexibility for maintenance operations and address potential challenges related to crane access at TPSS No. 1A.	The new TPSS option would be located on a parcel identified in the Draft EIR for permanent easement. The larger footprint required for the TPSS at this location could necessitate a larger partial acquisition or, if needed to accommodate all the elements of the project that impact the parcel, full acquisition of the property.	Appendix B, Select Advanced Conceptual Engineering Drawings - Locally Preferred Alternative, Page RW-302
2	Public Property: Manhattan Beach Boulevard crossing[1]	Lawndale	In response to comments from the Metropolitan Water District (MWD) on the Draft EIR regarding a potential utility conflict with a cast-in-drilled-hole (CIDH) pile proposed in the center of Manhattan Beach Boulevard—specifically, its location above a MWD water pipeline—an alternate support location for the elevated light rail structure is proposed at this location.	The refined design for the elevated light rail structure would eliminate the CIDH pile within Manhattan Beach Boulevard and shift the proposed straddle bents—located within the Metro ROW—to the north and south of the boulevard. This change would avoid any potential conflict with the underground MWD pipeline, allowing it to remain in place during both project construction and operation.	Appendix B, Select Advanced Conceptual Engineering Drawings - Locally Preferred Alternative, Page TC-302 and RW-304
3	Private Properties: Between 190th Street and south of Del Amo Boulevard	Torrance	Based on coordination with BNSF regarding the proposed freight track realignment, the design was refined to include a maintenance access path to serve the relocated freight tracks.	South of 190th Street, the railroad corridor would be widened by approximately five feet beyond what was included in the Draft EIR, to the southwest of the Metro ROW, to accommodate a maintenance access path for the freight tracks. This refinement would increase the area of partial acquisitions from industrial properties.	Appendix B, Select Advanced Conceptual Engineering Drawings - Locally Preferred Alternative, Page RW-313 through RW-318, T-314 through T-318

ID	Location	City/ Jurisdiction	Reason for Refinement	Description of Refinement	Reference
4	Private Properties: North of Prairie Avenue, west of Metro ROW	Torrance	More detailed modeling of power demand for light rail operations indicated that minimum traction power voltage requirements may not be met with TPSS No. 5A, located near the Prairie Avenue overcrossing. To ensure adequate system performance, the design was refined to identify an alternate location (TPSS No. 5B) farther south, adjacent to the Del Amo Boulevard bridge.	TPSS No. 5B would be located to the north side of the Del Amo Boulevard bridge, on a parcel previously identified for acquisition as part of the project.	Appendix B, Select Advanced Conceptual Engineering Drawings - Locally Preferred Alternative, Page RW-318
5	Private Properties: Parcels (APN: 7352-015-005, 7352-015-006, and 7352-015-004) between Prairie Avenue and Del Amo Boulevard	Torrance	In response to comments from both Torrance Refining Company (TORC) and Torrance Logistics Company (TLC), the project design was refined to minimize the partial acquisition of the TORC property. This refinement addresses safety, security, and property concerns related to the TORC facility operations and compliance with applicable regulations.	Between north of Prairie Avenue and Del Amo Boulevard, the project footprint (including freight, light rail, and access roads) has shifted westward to avoid the TORC parcel. As a result, a larger partial acquisition would be required from the adjacent vacant parcel west of the rail corridor. This shift would also require additional modifications to the existing Prairie Avenue and Del Amo Boulevard bridges. At Prairie Avenue, a new box tunnel would be constructed to allow a realigned freight track and access road to pass beneath the roadway. At Del Amo Boulevard, the area beneath the bridge would be widened on the west to accommodate light rail and realigned freight and to provide sufficient clearance.	Appendix B, Select Advanced Conceptual Engineering Drawings - Locally Preferred Alternative, Page RW-315 through RW-318

ID	Location	City/ Jurisdiction	Reason for Refinement	Description of Refinement	Reference
6	City Property: City of Torrance Transit Center (APN: 7352-002-912)	Torrance	In response to comments from the City of Torrance, an alternative construction staging location has been identified, which would avoid potential conflicts with the City of Torrance's proposed parking garage.	An alternate construction staging site has been identified on a parcel (APN: 7352-002-911) adjacent to the Torrance Transit Center on Crenshaw Boulevard. This adjustment would allow construction staging to proceed without interfering with the City of Torrance's planned parking garage development.	Chapter 2, Description of the Locally Preferred Alternative, Page 2-36
7	City Property: Torrance Transit Center Station Path	Torrance	In response to comments from the City of Torrance, the design was refined to address pedestrian safety and security concerns related to a segment of the proposed path connecting Crenshaw Boulevard to the Torrance Transit Center Station area. Specifically, the City raised concerns that the path could encourage pedestrians to cross Crenshaw Boulevard outside of signalized intersections.	The proposed path would provide pedestrian access from the light rail platform to the proposed bus plaza within the Torrance Transit Center. The segment of the proposed path that would have extended from the bus plaza to Crenshaw Boulevard has been removed from the design.	Appendix B, Select Advanced Conceptual Engineering Drawings - Locally Preferred Alternative, Page T-321

Source: STV, 2025

[1]This refinement only applies to the Elevated/At-Grade Alignment and LPA.

APN = Assessor's Parcel Number; BNSF= BNSF Railway; CIDH= cast-in-drilled-hole; MWD = Metropolitan Water District; ROW = right-of-way; TLC = Torrance Logistics Company; TORC = Torrance Refining Company; TPSS = Traction power substation

ES.4 Corrections and Additions

This Final EIR includes the corrections and additions to the Draft EIR, specifically addressing subject matter presented in the Draft EIR that has been corrected or added. Pursuant to Public Resources Code Section 21092.1 and CEQA Guidelines Section 15088.5, these changes do not constitute "significant new information" that would require recirculation of the Draft EIR. These revisions do not disclose a new significant and unavoidable environmental impact, a substantial increase in the severity of an impact, or identify a new feasible mitigation measure or alternative considerably different from those provided in the Draft EIR, which would considerably lessen a significant impact, but that Metro has declined to implement. Rather, the EIR's corrections and additions clarify, amplify, or make insignificant modifications to the Draft EIR.

ES.5 Response to Comments on the Draft EIR

The Final EIR includes responses to all comments made on the Draft EIR during the comment period described in Section ES.2. Written responses to comments are included in Chapter 5 of this Final EIR, and copies of emails, letters, comment cards, voicemails, and transcribed spoken comments are included in Appendix C of this Final EIR. The responses to comments are organized by commenters: agencies, organizations, groups and businesses, public hearings, and individuals. Several topics were mentioned frequently by commenters. To address these efficiently and consistently, and to ensure accuracy, major topic responses (MR) were developed for the following topics and are included in Section 5.2 of this Final EIR:

- MR-1: Selection of Alternatives
- MR-2: Operational Noise Analysis Methodology and Impact Thresholds
- MR-3: Operational Noise Project Features and Mitigation Measures
- MR-4: Potential Negative Health Effects Related to Noise, Vibration, and Air Quality
- MR-5: Vibration Impact Types and Impact Thresholds
- MR-6: Vibration Analysis During Final Design
- MR-7: Utility Relocation and Hazardous Materials Safety
- MR-8: Light Rail and Freight Train Safety
- MR-9: Light Rail Security
- MR-10: Changes to Community Character
- MR-11: Traffic Delay and Level-of-Service
- MR-12: Emergency Access
- MR-13: Soil Stability and Sinkholes
- MR-14: Property Values and Impacts to Businesses
- MR-15: Metro Ridership Forecasting Methodology
- MR-16: Response to Lawndale and Redondo Beach Community Letter
- MR-17: Response to Torrance Community Letter
- MR-18: Homelessness
- MR-19: Project Benefits
- MR-20: Proximity Impacts of Relocated Freight Tracks
- MR-21: Cost Estimates and Schedule

ES.6 Alternatives Considered in the Draft EIR

CEQA requires that a range of reasonable project alternatives are considered that could meet most of the basic project objectives and substantially reduce or eliminate significant impacts associated with the project. CEQA Guidelines Section 15126.6(a) states, in part:

> *"An EIR shall describe a range of reasonable alternatives to the project, or to the location of the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project and evaluate the comparative merits of the alternatives. An EIR need not consider every conceivable alternative to a project. Rather it must consider a reasonable range of potentially feasible alternatives that will foster informed decision making and public participation."*

- No Project Alternative – The No Project Alternative is required by CEQA Guidelines Section 15126.6(e) and assumes that Metro would not implement the project. The No Project Alternative is evaluated in the context of the existing transportation facilities in the Project Area and other capital transportation improvements and/or transit and highway operational enhancements that are reasonably foreseeable.
- High Frequency Bus Alternative – The HFB Alternative would implement a rapid bus service instead of a light rail extension.
- 170th/182nd Grade-Separated Light Rail Transit Alternative – As discussed previously, this alternative was selected as the LPA by the Metro Board.

ES.7 Environmental Impact Analysis

The Draft EIR identifies potential environmental impacts due to the construction and operation of the Options and Alternatives and analyzes any significant impacts and implementation of feasible mitigation measures. Project features are incorporated as part of the project and consist of design features, best management practices, or other measures required by law and/or permit approvals that avoid or minimize potential effects. Mitigation measures are additional actions, not otherwise part of the project, that are designed to avoid, minimize, or compensate for significant impacts.

Table ES-3 below provides a high-level overview of the topic areas where environmental impacts have been identified for the LPA in the Draft EIR and this Final EIR.

Table ES-3. Summary of Environmental Impacts for the Locally Preferred Alternative

Level of Impact	Environmental Topic Areas
No Impact/Less than Significant Impact	Transportation During Construction & Operation Aesthetics During Operation Air Quality During Construction & Operation Land Use and Planning During Construction & Operation Greenhouse Gas Emissions During Construction & Operation Hazards and Hazardous Materials During Construction & Operation Geology, Soils, and Paleontological Resources During Operation Hydrology and Water Quality During Construction & Operation Utilities and Service Systems During Construction & Operation Energy During Construction & Operation Cultural Resources During Operation Tribal Cultural Resources During Operation Public Services During Construction & Operation
Less than Significant Impact with Mitigation	Aesthetics During Construction Noise and Vibration During Operation Biological Resources During Construction & Operations Geology, Soils, and Paleontological Resources During Construction Cultural Resources During Construction Tribal Cultural Resources During Construction
Significant and Unavoidable Impact	Noise and Vibration During Construction

ES.8 SIGNIFICANT AND UNAVOIDABLE IMPACTS

CEQA Guidelines under Section 15216(b) require EIRs to include a discussion of any significant environmental impacts that cannot be avoided if the project is implemented. The Draft EIR identifies environmental resources with significant and unavoidable impacts and presents feasible mitigation measures to reduce impacts to a less than significant level. If a specific impact cannot be reduced to a less than significant level, it is considered a significant and unavoidable impact. As concluded in the Draft and Final EIR and shown in Table ES-3, the following impacts would be significant and unavoidable, even after implementation of mitigation measures:

- Air Quality (construction – Trench Option only)
- Noise (construction – all alignments; operation – Elevated/At-Grade Alignment only)
- Vibration (construction – all alignments)

ES.8-1 Environmentally Superior Alternative

CEQA Guidelines Section 15126.6 requires that an "environmentally superior" alternative be identified. The environmentally superior alternative is the alternative that would be expected to generate the fewest adverse impacts. If the environmentally superior alternative is the No Project alternative, the EIR shall also identify an environmentally superior alternative among the other alternatives.

As discussed in the Draft EIR Table ES-4, the No Project Alternative would avoid many of the construction impacts identified for the light rail project, but it would have significant and unavoidable impacts during operation related to transportation, land use and planning, air quality, greenhouse gas emissions, and energy as it would conflict with plans and programs that assumed the project would be

built. The HFB Alternative would reduce all construction and operational impacts identified for a light rail project. Therefore, the HFB Alternative is the environmentally superior alternative as it would avoid or reduce all impacts to a less than significant level. However, the HFB Alternative would not realize the same level of benefits from vehicle miles traveled reduction, air quality improvements, greenhouse gas emissions reduction, and energy savings as the light rail alignments.

ES.9 SUMMARY OF ENVIRONMENTAL IMPACTS AND MITIGATION MEASURES

Table ES-4 summarizes the impacts of all alignments and project alternatives considered in the EIR process. Table ES-5 through Table ES-19 identify the environmental impacts, mitigation measures, and level of significance after mitigation, if applicable. Detailed analyses of these topics are provided in Chapter 3, Environmental Impacts, of the Draft EIR, with corrections, additions, and clarifications to the Draft EIR analysis provided in Chapter 4, Corrections and Additions, of this Final EIR.

Table ES-4. Summary of Alternatives' Environmental Impacts

		Elevated/At-Grade Alignment	Trench Option	Hawthorne Option	No Project Alternative	HFB Alternative	LPA
Transportation	Construction	LTS	LTS	LTS	LTS	LTS	LTS
	Operation	LTS	LTS	LTS	SUI	LTS	LTS
Land Use and Planning	Construction	LTS	LTS	LTSM	LTS	LTS	LTS
	Operation	LTS	LTS	LTS	SUI	LTS	LTS
Aesthetics	Construction	LTSM	LTSM	LTSM	LTS	LTS	LTSM
	Operation	LTS	LTS	LTS	LTS	LTS	LTS
Air Quality	Construction	LTS	SUI	LTS	LTS	LTS	LTS
	Operation	LTS	LTS	LTS	SUI	LTS	LTS
Greenhouse Gas Emissions	Construction	LTS	LTS	LTS	LTS	LTS	LTS
	Operation	LTS	LTS	LTS	SUI	LTS	LTS
Noise	Construction	SUI	SUI	SUI	LTS	LTS	SUI
	Operation	SUI	SUI/LTSM[1]	LTS	LTS	LTS	SUI/LTSM[1]
Vibration	Construction	SUI	SUI	SUI	LTS	LTS	SUI
	Operation	LTSM	LTSM	LTSM	LTS	LTS	LTSM
Biological Resources	Construction	LTSM	LTSM	LTSM	LTS	LTS	LTSM
	Operation	LTSM	LTSM	LTSM	LTS	LTS	LTSM
Geology, Soils, and Paleontological Resources	Construction	LTSM	LTSM	LTSM	LTS	LTS	LTSM
	Operation	LTS	LTS	LTS	LTS	LTS	LTS
Hazards and Hazardous Materials	Construction	LTS	LTS	LTS	LTS	LTS	LTS
	Operation	LTS	LTS	LTS	LTS	LTS	LTS

		Elevated/At-Grade Alignment	Trench Option	Hawthorne Option	No Project Alternative	HFB Alternative	LPA
Hydrology and Water Quality	Construction	LTS	LTS	LTS	LTS	LTS	LTS
	Operation	LTS	LTS	LTS	LTS	LTS	LTS
Utilities and Service Systems	Construction	LTS	LTS	LTS	LTS	LTS	LTS
	Operation	LTS	LTS	LTS	LTS	LTS	LTS
Energy	Construction	LTS	LTS	LTS	LTS	LTS	LTS
	Operation	LTS	LTS	LTS	SUI	LTS	LTS
Cultural Resources	Construction	LTSM	LTSM	LTSM	LTS	LTS	LTSM
	Operation	LTS	LTS	LTS	LTS	LTS	LTS
Tribal Cultural Resources	Construction	LTSM	LTSM	LTSM	LTS	LTS	LTSM
	Operation	LTS	LTS	LTS	LTS	LTS	LTS
Public Services	Construction	LTS	LTS	LTS	LTS	LTS	LTS
	Operation	LTS	LTS	LTS	LTS	LTS	LTS

[1] With the establishment of quiet zones by the Cities of Lawndale, Redondo Beach, and Torrance (MM-NOI-4), the Trench Option and LPA would have a less than significant impact with mitigation for operational noise.

HFB = High Frequency Bus; LPA = Locally Preferred Alternative; LTS = Less than significant; LTSM = Less than significant with mitigation; SUI = Significant and unavoidable impact

Table ES-5. Summary of Transportation Impacts Evaluation

Environmental Impact	Alignment	Impact Before Mitigation	Proposed Mitigation Measures	Impact After Mitigation
Transportation				
A. Will the Project conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities?	LPA	Construction: Less than Significant Operations: Less than Significant	None	Construction: Less than Significant Operations: Less than Significant
	Elevated/At-Grade Alignment	Construction: Less than Significant Operations: Less than Significant	None	Construction: Less than Significant Operations: Less than Significant
	Trench Option	Construction: Less than Significant Operations: Less than Significant	None	Construction: Less than Significant Operations: Less than Significant
	Hawthorne Option	Construction: Less than Significant Operations: Less than Significant	None	Construction: Less than Significant Operations: Less than Significant
B. Will the Project conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?	LPA	Construction: Less than Significant Operations: Less than Significant	None	Construction: Less than Significant Operations: Less than Significant
	Elevated/At-Grade Alignment	Construction: Less than Significant Operations: Less than Significant	None	Construction: Less than Significant Operations: Less than Significant
	Trench Option	Construction: Less than Significant Operations: Less than Significant	None	Construction: Less than Significant Operations: Less than Significant
	Hawthorne Option	Construction: Less than Significant Operations: Less than Significant	None	Construction: Less than Significant Operations: Less than Significant
C. Will the Project substantially increase hazards due to a geometric design feature or incompatible uses?	LPA	Construction: Less than Significant Operations: Less than Significant	None	Construction: Less than Significant Operations: Less than Significant
	Elevated/At-Grade Alignment	Construction: Less than Significant Operations: Less than Significant	None	Construction: Less than Significant Operations: Less than Significant
	Trench Option	Construction: Less than Significant Operations: Less than Significant	None	Construction: Less than Significant Operations: Less than Significant
	Hawthorne Option	Construction: Less than Significant Operations: Less than Significant	None	Construction: Less than Significant Operations: Less than Significant

Environmental Impact	Alignment	Impact Before Mitigation	Proposed Mitigation Measures	Impact After Mitigation
Transportation				
D. Will the Project result in inadequate emergency access?	LPA	Construction: Less than Significant Operations: Less than Significant	None	Construction: Less than Significant Operations: Less than Significant
	Elevated/At-Grade Alignment	Construction: Less than Significant Operations: Less than Significant	None	Construction: Less than Significant Operations: Less than Significant
	Trench Option	Construction: Less than Significant Operations: Less than Significant	None	Construction: Less than Significant Operations: Less than Significant
	Hawthorne Option	Construction: Less than Significant Operations: Less than Significant	None	Construction: Less than Significant Operations: Less than Significant

Table ES-6. Summary of Land Use Impacts Evaluation

Environmental Impact	Alignment	Impact Before Mitigation	Proposed Mitigation Measures	Impact After Mitigation
Land Use				
A. Would the Project physically divide an established community?	LPA	Construction: Less than Significant Operations: Less than Significant	None	Construction: Less than Significant Operations: Less than Significant
	Elevated/At-Grade Alignment	Construction: Less than Significant Operations: Less than Significant	None	Construction: Less than Significant Operations: Less than Significant
	Trench Option	Construction: Less than Significant Operations: Less than Significant	None	Construction: Less than Significant Operations: Less than Significant
	Hawthorne Option	Construction: Less than Significant Operations: Less than Significant	None	Construction: Less than Significant Operations: Less than Significant
B. Would the Project cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?	LPA	Construction: Less than Significant Operations: Less than Significant	None	Construction: Less than Significant Operations: Less than Significant
	Elevated/At-Grade Alignment	Construction: Less than Significant Operations: Less than Significant	None	Construction: Less than Significant Operations: Less than Significant
	Trench Option	Construction: Less than Significant Operations: Less than Significant	None	Construction: Less than Significant Operations: Less than Significant
	Hawthorne Option	**Construction: Significant** Operations: Less than Significant	Construction: MM-LU-1: Temporary Crossings	Construction: Less than Significant Operations: Less than Significant

Table ES-7. Summary of Visual and Aesthetics Impacts Evaluation

Environmental Impact	Alignment	Impact Before Mitigation	Proposed Mitigation Measures	Impact After Mitigation
Visual & Aesthetics				
A. Would the Project have a substantial effect on a scenic vista?	LPA	Construction: Less than Significant Operations: Less than Significant	None	Construction: Less than Significant Operations: Less than Significant
	Elevated/At-Grade Alignment	Construction: No Impact Operations: No Impact	None	Construction: No Impact Operations: No Impact
	Trench Option	Construction: No Impact Operations: No Impact	None	Construction: No Impact Operations: No Impact
	Hawthorne Option	Construction: No Impact Operations: No Impact	None	Construction: No Impact Operations: No Impact
B. Would the Project substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	LPA	Construction: Less than Significant Operations: Less than Significant	None	Construction: Less than Significant Operations: Less than Significant
	Elevated/At-Grade Alignment	Construction: No Impact Operations: No Impact	None	Construction: No Impact Operations: No Impact
	Trench Option	Construction: No Impact Operations: No Impact	None	Construction: No Impact Operations: No Impact
	Hawthorne Option	Construction: No Impact Operations: No Impact	None	Construction: No Impact Operations: No Impact

Environmental Impact	Alignment	Impact Before Mitigation	Proposed Mitigation Measures	Impact After Mitigation
Visual & Aesthetics				
C. In non-urbanized areas, would the Project substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point such as a sidewalk). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?	LPA	Construction: Less than Significant Operations: Less than Significant	None	Construction: Less than Significant Operations: Less than Significant
	Elevated/At-Grade Alignment	Construction: Less than Significant Operations: Less than Significant	None	Construction: Less than Significant Operations: Less than Significant
	Trench Option	Construction: Less than Significant Operations: Less than Significant	None	Construction: Less than Significant Operations: Less than Significant
	Hawthorne Option	Construction: Less than Significant Operations: Less than Significant	None	Construction: Less than Significant Operations: Less than Significant
D. Would the Project create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	LPA	**Construction: Significant** Operations: Less than Significant	Construction: MM-AES-1: Construction Lighting	Construction: Less than Significant Operations: Less than Significant
	Elevated/At-Grade Alignment	**Construction: Significant** Operations: Less than Significant	Construction: MM-AES-1: Construction Lighting	Construction: Less than Significant Operations: Less than Significant
	Trench Option	**Construction: Significant** Operations: Less than Significant	Construction: MM-AES-1: Construction Lighting	Construction: Less than Significant Operations: Less than Significant
	Hawthorne Option	**Construction: Significant** Operations: Less than Significant	Construction: MM-AES-1: Construction Lighting	Construction: Less than Significant Operations: Less than Significant

Table ES-8. Summary of Air Quality Impacts Evaluation

Environmental Impact	Alignment	Impact Before Mitigation	Proposed Mitigation Measures	Impact After Mitigation
Air Quality				
A. Would the Project conflict with or obstruct implementation of the applicable air quality plan?	LPA	Construction: Less than Significant Operations: Less than Significant	None	Construction: Less than Significant Operations: Less than Significant
	Elevated/At-Grade Alignment	Construction: Less than Significant Operations: Less than Significant	None	Construction: Less than Significant Operations: Less than Significant
	Trench Option	**Construction: Significant** Operations: Less than Significant	Construction: MM-AQ-1: Cleaner Haul Trucks	**Construction: Significant and Unavoidable** Operations: Less than Significant
	Hawthorne Option	Construction: Less than Significant Operations: Less than Significant	None	Construction: Less than Significant Operations: Less than Significant
B. Would the Project result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?	LPA	Construction: Less than Significant Operations: Less than Significant	None	Construction: Less than Significant Operations: Less than Significant
	Elevated/At-Grade Alignment	Construction: Less than Significant Operations: Less than Significant	None	Construction: Less than Significant Operations: Less than Significant
	Trench Option	**Construction: Significant** Operations: Less than Significant	Construction: MM-AQ-1: Cleaner Haul Trucks	**Construction: Significant and Unavoidable** Operations: Less than Significant
	Hawthorne Option	Construction: Less than Significant Operations: Less than Significant	None	Construction: Less than Significant Operations: Less than Significant
C. Would the Project expose sensitive receptors to substantial pollutant concentrations?	LPA	Construction: Less than Significant Operations: Less than Significant	None	Construction: Less than Significant Operations: Less than Significant
	Elevated/At-Grade Alignment	Construction: Less than Significant Operations: Less than Significant	None	Construction: Less than Significant Operations: Less than Significant
	Trench Option	Construction: Less than Significant Operations: Less than Significant	None	Construction: Less than Significant Operations: Less than Significant
	Hawthorne Option	Construction: Less than Significant Operations: Less than Significant	None	Construction: Less than Significant Operations: Less than Significant

Environmental Impact	Alignment	Impact Before Mitigation	Proposed Mitigation Measures	Impact After Mitigation
Air Quality				
D. Would the Project result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?	LPA	Construction: Less than Significant Operations: Less than Significant	None	Construction: Less than Significant Operations: Less than Significant
	Elevated/At-Grade Alignment	Construction: Less than Significant Operations: Less than Significant	None	Construction: Less than Significant Operations: Less than Significant
	Trench Option	Construction: Less than Significant Operations: Less than Significant	None	Construction: Less than Significant Operations: Less than Significant
	Hawthorne Option	Construction: Less than Significant Operations: Less than Significant	None	Construction: Less than Significant Operations: Less than Significant

Table ES-9. Summary of Greenhouse Gas Emissions Impacts Evaluation

Environmental Impact	Alignment	Impact Before Mitigation	Proposed Mitigation Measures	Impact After Mitigation
Greenhouse Gas Emissions				
A. Would the Project generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	LPA	Construction: Less than Significant Operations: Less than Significant	None	Construction: Less than Significant Operations: Less than Significant
	Elevated/At-Grade Alignment	Construction: Less than Significant Operations: Less than Significant	None	Construction: Less than Significant Operations: Less than Significant
	Trench Option	Construction: Less than Significant Operations: Less than Significant	None	Construction: Less than Significant Operations: Less than Significant
	Hawthorne Option	Construction: Less than Significant Operations: Less than Significant	None	Construction: Less than Significant Operations: Less than Significant
B. Would the Project conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	LPA	Construction: Less than Significant Operations: Less than Significant	None	Construction: Less than Significant Operations: Less than Significant
	Elevated/At-Grade Alignment	Construction: Less than Significant Operations: Less than Significant	None	Construction: Less than Significant Operations: Less than Significant
	Trench Option	Construction: Less than Significant Operations: Less than Significant	None	Construction: Less than Significant Operations: Less than Significant
	Hawthorne Option	Construction: Less than Significant Operations: Less than Significant	None	Construction: Less than Significant Operations: Less than Significant

Table ES-10. Summary of Noise and Vibration Impacts Evaluation

Environmental Impact	Alignment	Impact Before Mitigation	Proposed Mitigation Measures	Impact After Mitigation
Noise and Vibration				
A. Would the Project result in generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established by the FTA, in the local general plan or noise ordinance, or applicable standards of other agencies?	LPA	**Construction: Significant** **Operations: Significant**	Construction: MM-NOI-1: Noise Control Plan Operations: MM-NOI-2: Soundwalls MM-NOI-3: Low Impact Frogs MM-NOI-4: Quiet Zone Establishment	**Construction: Significant and Unavoidable** Operations: Less than Significant[1]
	Elevated/At-Grade Alignment	**Construction: Significant** **Operations: Significant**	Construction: MM-NOI-1: Noise Control Plan Operation: MM-NOI-2: Soundwalls MM-NOI-3: Low Impact Frogs MM-NOI-4: Quiet Zone Establishment	**Construction: Significant and Unavoidable** **Operations: Significant and Unavoidable**
	Trench Option	**Construction: Significant** **Operations: Significant**	Construction: MM-NOI-1: Noise Control Plan Operations: MM-NOI-2: Soundwalls MM-NOI-3: Low Impact Frogs MM-NOI-4: Quiet Zone Establishment	**Construction: Significant and Unavoidable** Operations: Less than Significant[1]

Environmental Impact	Alignment	Impact Before Mitigation	Proposed Mitigation Measures	Impact After Mitigation
Noise and Vibration				
	Hawthorne Option	**Construction: Significant** **Operations: Significant**	Construction: MM-NOI-1: Noise Control Plan Operations: MM-NOI-2: Soundwalls MM-NOI-3: Low Impact Frogs MM-NOI-5: Wheel Squeal Noise Monitoring	**Construction: Significant and Unavoidable** Operations: Less than Significant
B. For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the Project expose people residing or working in the project area to excessive noise levels?	LPA	Construction: No Impact Operations: No Impact	None	Construction: No Impact Operations: No Impact
	Elevated/At-Grade Alignment	Construction: No Impact Operations: No Impact	None	Construction: No Impact Operations: No Impact
	Trench Option	Construction: No Impact Operations: No Impact	None	Construction: No Impact Operations: No Impact
	Hawthorne Option	Construction: No Impact Operations: No Impact	None	Construction: No Impact Operations: No Impact

Environmental Impact	Alignment	Impact Before Mitigation	Proposed Mitigation Measures	Impact After Mitigation
Noise and Vibration				
C. Would the Project result in generation of excessive ground-borne vibration?	LPA	**Construction: Significant** **Operations: Significant**	Construction: MM-VIB-1: Vibration Control Plan MM-VIB-2: Construction Equipment Location Operations: MM-VIB-4: Low-Impact Frogs MM-VIB-5: Resilient Fasteners MM-VIB-6: Ballast Mats	**Construction: Significant and Unavoidable** Operations: Less than Significant
	Elevated/At-Grade Alignment	**Construction: Significant** **Operations: Significant**	Construction: MM-VIB-1: Vibration Control Plan MM-VIB-2: Construction Equipment Location MM-VIB-3: Pre- and Post-Construction Surveys Operations: MM-VIB-4: Low-Impact Frogs MM-VIB-5: Resilient Fasteners MM-VIB-6: Ballast Mats	**Construction: Significant and Unavoidable** Operations: Less than Significant

Environmental Impact	Alignment	Impact Before Mitigation	Proposed Mitigation Measures	Impact After Mitigation
Noise and Vibration				
	Trench Option	**Construction: Significant** **Operations: Significant**	Construction: MM-VIB-1: Vibration Control Plan MM-VIB-2: Construction Equipment Location Operations: MM-VIB-4: Low-Impact Frogs MM-VIB-5: Resilient Fasteners MM-VIB-6: Ballast Mats	**Construction: Significant and Unavoidable** Operations: Less than Significant
	Hawthorne Option	**Construction: Significant** Operations: Less than Significant	Construction: MM-VIB-1: Vibration Control Plan MM-VIB-2: Construction Equipment Location	**Construction: Significant and Unavoidable** Operations: Less than Significant

[1]With the establishment of quiet zones by the Cities of Lawndale, Redondo Beach, and Torrance (MM-NOI-4), the Trench Option and LPA would have a less than significant impact with mitigation for operational noise.

Table ES-11. Summary of Biological Resources Impacts Evaluation

Environmental Impact	Alignment	Impact Before Mitigation	Proposed Mitigation Measures	Impact After Mitigation
Biological Resources				
A. Would the Project have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?	LPA	**Construction: Significant** **Operations: Significant**	Construction: MM-BIO-1: General Protection Measures to Avoid and Minimize Impacts on Sensitive Biological Resources MM-BIO-2: Nesting Bird Season Restrictions and Pre-Construction Surveys MM-BIO-3: Roosting Bat Restrictions and Survey Requirements MM-BIO-4: Pre-construction Rare Plant Survey Operations: MM-BIO-1: General Protection Measures to Avoid and Minimize Impacts on Sensitive Biological Resources MM-BIO-5: Off-site Mitigation for Southern Tarplant Habitat	Construction: Less than Significant Operations: Less than Significant

Environmental Impact	Alignment	Impact Before Mitigation	Proposed Mitigation Measures	Impact After Mitigation
Biological Resources				
A. Would the Project have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?	Elevated/At-Grade Alignment	**Construction: Significant** **Operations: Significant**	Construction: MM-BIO-1: General Protection Measures to Avoid and Minimize Impacts on Sensitive Biological Resources MM-BIO-2: Nesting Bird Season Restrictions and Pre-Construction Surveys MM-BIO-3: Roosting Bat Restrictions and Survey Requirements MM-BIO-4: Pre-construction Rare Plant Survey Operations: MM-BIO-1: General Protection Measures to Avoid and Minimize Impacts on Sensitive Biological Resources MM-BIO-5: Off-site Mitigation for Southern Tarplant Habitat	Construction: Less than Significant Operations: Less than Significant

Environmental Impact	Alignment	Impact Before Mitigation	Proposed Mitigation Measures	Impact After Mitigation
Biological Resources				
A. Would the Project have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?	Trench Option	**Construction: Significant** **Operations: Significant**	Construction: MM-BIO-1: General Protection Measures to Avoid and Minimize Impacts on Sensitive Biological Resources MM-BIO-2: Nesting Bird Season Restrictions and Pre-Construction Surveys MM-BIO-3: Roosting Bat Restrictions and Survey Requirements MM-BIO-4: Pre-construction Rare Plant Survey Operations: MM-BIO-1: General Protection Measures to Avoid and Minimize Impacts on Sensitive Biological Resources MM-BIO-5: Off-site Mitigation for Southern Tarplant Habitat	Construction: Less than Significant Operations: Less than Significant
	Hawthorne Option	**Construction: Significant** **Operations: Significant**	Construction: MM-BIO-1: General Protection Measures to Avoid and Minimize Impacts on Sensitive Biological Resources	Construction: Less than Significant Operations: Less than Significant

Environmental Impact	Alignment	Impact Before Mitigation	Proposed Mitigation Measures	Impact After Mitigation
Biological Resources				
			MM-BIO-2: Nesting Bird Season Restrictions and Pre-Construction Surveys MM-BIO-3: Roosting Bat Restrictions and Survey Requirements MM-BIO-4: Pre-construction Rare Plant Survey Operations: MM-BIO-1: General Protection Measures to Avoid and Minimize Impacts on Sensitive Biological Resources MM-BIO-5: Off-site Mitigation for Southern Tarplant Habitat	
B. Would the Project have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?	LPA	Construction: No Impact Operations: No Impact	None	Construction: No Impact Operations: No Impact
	Elevated/At-Grade Alignment	Construction: No Impact Operations: No Impact	None	Construction: No Impact Operations: No Impact
	Trench Option	Construction: No Impact Operations: No Impact	None	Construction: No Impact Operations: No Impact
	Hawthorne Option	Construction: No Impact Operations: No Impact	None	Construction: No Impact Operations: No Impact

Environmental Impact	Alignment	Impact Before Mitigation	Proposed Mitigation Measures	Impact After Mitigation
Biological Resources				
C. Would the Proposed Project have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	LPA	Construction: No Impact Operations: No Impact	None	Construction: No Impact Operations: No Impact
	Elevated/At-Grade Alignment	Construction: No Impact Operations: No Impact	None	Construction: No Impact Operations: No Impact
	Trench Option	Construction: No Impact Operations: No Impact	None	Construction: No Impact Operations: No Impact
	Hawthorne Option	Construction: No Impact Operations: No Impact	None	Construction: No Impact Operations: No Impact
D. Would the Project interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	LPA	Construction: No Impact Operations: No Impact	None	Construction: No Impact Operations: No Impact
	Elevated/At-Grade Alignment	Construction: No Impact Operations: No Impact	None	Construction: No Impact Operations: No Impact
	Trench Option	Construction: No Impact Operations: No Impact	None	Construction: No Impact Operations: No Impact
	Hawthorne Option	Construction: No Impact Operations: No Impact	None	Construction: No Impact Operations: No Impact

Environmental Impact	Alignment	Impact Before Mitigation	Proposed Mitigation Measures	Impact After Mitigation
Biological Resources				
E. Would the Project conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	LPA	**Construction: Significant** **Operations: Significant**	Construction: MM-BIO-1: General Protection Measures to Avoid and Minimize Impacts on Sensitive Biological Resources MM-BIO-5: Off-site Mitigation for Southern Tarplant Habitat Operations: MM-BIO-1: General Protection Measures to Avoid and Minimize Impacts on Sensitive Biological Resources MM-BIO-5: Off-site Mitigation for Southern Tarplant Habitat	Construction: Less than Significant Operations: Less than Significant
	Elevated/At-Grade Alignment	**Construction: Significant** **Operations: Significant**	Construction: MM-BIO-1: General Protection Measures to Avoid and Minimize Impacts on Sensitive Biological Resources MM-BIO-5: Off-site Mitigation for Southern Tarplant Habitat	Construction: Less than Significant Operations: Less than Significant

Environmental Impact	Alignment	Impact Before Mitigation	Proposed Mitigation Measures	Impact After Mitigation
Biological Resources				
			Operations: MM-BIO-1: General Protection Measures to Avoid and Minimize Impacts on Sensitive Biological Resources MM-BIO-5: Off-site Mitigation for Southern Tarplant Habitat	
	Trench Option	**Construction: Significant** **Operations: Significant**	Construction: MM-BIO-1: General Protection Measures to Avoid and Minimize Impacts on Sensitive Biological Resources MM-BIO-5: Off-site Mitigation for Southern Tarplant Habitat Operations: MM-BIO-1: General Protection Measures to Avoid and Minimize Impacts on Sensitive Biological Resources MM-BIO-5: Off-site Mitigation for Southern Tarplant Habitat	Construction: Less than Significant Operations: Less than Significant

Environmental Impact	Alignment	Impact Before Mitigation	Proposed Mitigation Measures	Impact After Mitigation
Biological Resources				
	Hawthorne Option	**Construction: Significant** **Operations: Significant**	Construction: MM-BIO-1: General Protection Measures to Avoid and Minimize Impacts on Sensitive Biological Resources MM-BIO-5: Off-site Mitigation for Southern Tarplant Habitat Operations: MM-BIO-1: General Protection Measures to Avoid and Minimize Impacts on Sensitive Biological Resources MM-BIO-5: Off-site Mitigation for Southern Tarplant Habitat	Construction: Less than Significant Operations: Less than Significant
F. Would the Project conflict with the provisions of an adopted HCP, Natural Community Conservation Plan (NCCP), or other approved local, regional, or state HCP?	LPA	Construction: No Impact Operations: No Impact	None	Construction: No Impact Operations: No Impact
	Elevated/At-Grade Alignment	Construction: No Impact Operations: No Impact	None	Construction: No Impact Operations: No Impact
	Trench Option	Construction: No Impact Operations: No Impact	None	Construction: No Impact Operations: No Impact
	Hawthorne Option	Construction: No Impact Operations: No Impact	None	Construction: No Impact Operations: No Impact

Table ES-12. Summary of Geology, Soils, and Paleontological Resources Impacts Evaluation

Environmental Impact	Alignment	Impact Before Mitigation	Proposed Mitigation Measures	Impact After Mitigation
Geology, Soils, and Paleontological Resources				
A. Would the Project directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving: i. Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo (AP) Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? ii. Strong seismic ground shaking iii. Seismic-related ground failure, including liquefaction iv. Landslides	LPA	Construction: Less than Significant Operations: Less than Significant	None	Construction: Less than Significant Operations: Less than Significant
	Elevated/At-Grade Alignment	Construction: Less than Significant Operations: Less than Significant	None	Construction: Less than Significant Operations: Less than Significant
	Trench Option	Construction: Less than Significant Operations: Less than Significant	None	Construction: Less than Significant Operations: Less than Significant
	Hawthorne Option	Construction: Less than Significant Operations: Less than Significant	None	Construction: Less than Significant Operations: Less than Significant
B. Would the Project result in substantial soil erosion or the loss of topsoil?	LPA	Construction: Less than Significant Operations: No Impact	None	Construction: Less than Significant Operations: No Impact
	Elevated/At-Grade Alignment	Construction: Less than Significant Operations: No Impact	None	Construction: Less than Significant Operations: No Impact

Environmental Impact	Alignment	Impact Before Mitigation	Proposed Mitigation Measures	Impact After Mitigation
Geology, Soils, and Paleontological Resources				
	Trench Option	Construction: Less than Significant Operations: No Impact	None	Construction: Less than Significant Operations: No Impact
	Hawthorne Option	Construction: Less than Significant Operations: No Impact	None	Construction: Less than Significant Operations: No Impact
C. Would the Project be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse?	LPA	Construction: Less than Significant Operations: Less than Significant	None	Construction: Less than Significant Operations: Less than Significant
	Elevated/At-Grade Alignment	Construction: Less than Significant Operations: Less than Significant	None	Construction: Less than Significant Operations: Less than Significant
	Trench Option	Construction: Less than Significant Operations: Less than Significant	None	Construction: Less than Significant Operations: Less than Significant
	Hawthorne Option	Construction: Less than Significant Operations: Less than Significant	None	Construction: Less than Significant Operations: Less than Significant
D. Would the Project be located on expansive soil, as defined in Section 1803.5.3 of the California Building Code, creating substantial direct or indirect risks to life or property?	LPA	Construction: Less than Significant Operations: Less than Significant	None	Construction: Less than Significant Operations: Less than Significant
	Elevated/At-Grade Alignment	Construction: Less than Significant Operations: Less than Significant	None	Construction: Less than Significant Operations: Less than Significant
	Trench Option	Construction: Less than Significant Operations: Less than Significant	None	Construction: Less than Significant Operations: Less than Significant
	Hawthorne Option	Construction: Less than Significant Operations: Less than Significant	None	Construction: Less than Significant Operations: Less than Significant

Environmental Impact	Alignment	Impact Before Mitigation	Proposed Mitigation Measures	Impact After Mitigation
Geology, Soils, and Paleontological Resources				
E. Would the Project have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?	LPA	Construction: Less than Significant Operations: Less than Significant	None	Construction: Less than Significant Operations: Less than Significant
	Elevated/At-Grade Alignment	Construction: No Impact Operations: No Impact	None	Construction: No Impact Operations: No Impact
	Trench Option	Construction: No Impact Operations: No Impact	None	Construction: No Impact Operations: No Impact
	Hawthorne Option	Construction: No Impact Operations: No Impact	None	Construction: No Impact Operations: No Impact
F. Would the Project directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	LPA	**Construction: Significant** Operations: No Impact	Construction: MM-GEO-1: Engage a Qualified Paleontological Resources Specialist	Construction: Less than Significant Operations: No Impact
	Elevated/At-Grade Alignment	**Construction: Significant** Operations: No Impact	Construction: MM-GEO-1: Engage a Qualified Paleontological Resources Specialist	Construction: Less than Significant Operations: No Impact
	Trench Option	**Construction: Significant** Operations: No Impact	Construction: MM-GEO-1: Engage a Qualified Paleontological Resources Specialist	Construction: Less than Significant Operations: No Impact
	Hawthorne Option	**Construction: Significant** Operations: No Impact	Construction: MM-GEO-1: Engage a Qualified Paleontological Resources Specialist	Construction: Less than Significant Operations: No Impact

Table ES-13. Summary of Hazards and Hazardous Materials Impacts Evaluation

Environmental Impact	Alignment	Impact Before Mitigation	Proposed Mitigation Measures	Impact After Mitigation
Hazards and Hazardous Materials				
A. Would the Project create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	LPA	Construction: Less than Significant Operations: Less than Significant	None	Construction: Less than Significant Operations: Less than Significant
	Elevated/At-Grade Alignment	Construction: Less than Significant Operations: Less than Significant	None	Construction: Less than Significant Operations: Less than Significant
	Trench Option	Construction: Less than Significant Operations: Less than Significant	None	Construction: Less than Significant Operations: Less than Significant
	Hawthorne Option	Construction: Less than Significant Operations: Less than Significant	None	Construction: Less than Significant Operations: Less than Significant
B. Would the Project create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	LPA	Construction: Less than Significant Operations: Less than Significant	None	Construction: Less than Significant Operations: Less than Significant
	Elevated/At-Grade Alignment	Construction: Less than Significant Operations: Less than Significant	None	Construction: Less than Significant Operations: Less than Significant
	Trench Option	Construction: Less than Significant Operations: Less than Significant	None	Construction: Less than Significant Operations: Less than Significant
	Hawthorne Option	Construction: Less than Significant Operations: Less than Significant	None	Construction: Less than Significant Operations: Less than Significant
C. Would the Project emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	LPA	Construction: Less than Significant Operations: Less than Significant	None	Construction: Less than Significant Operations: Less than Significant
	Elevated/At-Grade Alignment	Construction: Less than Significant Operations: Less than Significant	None	Construction: Less than Significant Operations: Less than Significant
	Trench Option	Construction: Less than Significant Operations: Less than Significant	None	Construction: Less than Significant Operations: Less than Significant
	Hawthorne Option	Construction: Less than Significant Operations: Less than Significant	None	Construction: Less than Significant Operations: Less than Significant

Environmental Impact	Alignment	Impact Before Mitigation	Proposed Mitigation Measures	Impact After Mitigation
Hazards and Hazardous Materials				
D. Would the Project be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?	LPA	Construction: Less than Significant Operations: Less than Significant	None	Construction: Less than Significant Operations: Less than Significant
	Elevated/At-Grade Alignment	Construction: Less than Significant Operations: No Impact	None	Construction: Less than Significant Operations: No Impact
	Trench Option	Construction: Less than Significant Operations: No Impact	None	Construction: Less than Significant Operations: No Impact
	Hawthorne Option	Construction: Less than Significant Operations: No Impact	None	Construction: Less than Significant Operations: No Impact
E. For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the Project result in a safety hazard or excessive noise for people residing or working in the Project Area?	LPA	Construction: No Impact Operations: No Impact	None	Construction: No Impact Operations: No Impact
	Elevated/At-Grade Alignment	Construction: No Impact Operations: No Impact	None	Construction: No Impact Operations: No Impact
	Trench Option	Construction: No Impact Operations: No Impact	None	Construction: No Impact Operations: No Impact
	Hawthorne Option	Construction: No Impact Operations: No Impact	None	Construction: No Impact Operations: No Impact
F. For a project located within the vicinity of a private airstrip, as a result, create a safety hazard for people residing or working in the project area.	LPA	Construction: No Impact Operations: No Impact	None	Construction: No Impact Operations: No Impact
	Elevated/At-Grade Alignment	Construction: No Impact Operations: No Impact	None	Construction: No Impact Operations: No Impact
	Trench Option	Construction: No Impact Operations: No Impact	None	Construction: No Impact Operations: No Impact
	Hawthorne Option	Construction: No Impact Operations: No Impact	None	Construction: No Impact Operations: No Impact

Environmental Impact	Alignment	Impact Before Mitigation	Proposed Mitigation Measures	Impact After Mitigation
Hazards and Hazardous Materials				
G. Would the Project impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	LPA	Construction: Less than Significant Operations: Less than Significant	None	Construction: Less than Significant Operations: Less than Significant
	Elevated/At-Grade Alignment	Construction: Less than Significant Operations: Less than Significant	None	Construction: Less than Significant Operations: Less than Significant
	Trench Option	Construction: Less than Significant Operations: Less than Significant	None	Construction: Less than Significant Operations: Less than Significant
	Hawthorne Option	Construction: Less than Significant Operations: Less than Significant	None	Construction: Less than Significant Operations: Less than Significant
H. Would the Project expose people or structures to a significant risk of loss, injury or death involving wildfires, including where wildland fires are adjacent to urbanized areas or where residences are intermixed with wildlands?	LPA	Construction: No Impact Operations: No Impact	None	Construction: No Impact Operations: No Impact
	Elevated/At-Grade Alignment	Construction: No Impact Operations: No Impact	None	Construction: No Impact Operations: No Impact
	Trench Option	Construction: No Impact Operations: No Impact	None	Construction: No Impact Operations: No Impact
	Hawthorne Option	Construction: No Impact Operations: No Impact	None	Construction: No Impact Operations: No Impact

Table ES-14. Summary of Hydrology and Water Quality Impacts Evaluation

Environmental Impact	Alignment	Impact Before Mitigation	Proposed Mitigation Measures	Impact After Mitigation
Hydrology and Water Quality				
A. Would the Project violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality?	LPA	Construction: Less than Significant Operations: Less than Significant	None	Construction: Less than Significant Operations: Less than Significant
	Elevated/At-Grade Alignment	Construction: Less than Significant Operations: Less than Significant	None	Construction: Less than Significant Operations: Less than Significant
	Trench Option	Construction: Less than Significant Operations: Less than Significant	None	Construction: Less than Significant Operations: Less than Significant
	Hawthorne Option	Construction: Less than Significant Operations: Less than Significant	None	Construction: Less than Significant Operations: Less than Significant
B. Would the Project substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?	LPA	Construction: Less than Significant Operations: Less than Significant	None	Construction: Less than Significant Operations: Less than Significant
	Elevated/At-Grade Alignment	Construction: Less than Significant Operations: Less than Significant	None	Construction: Less than Significant Operations: Less than Significant
	Trench Option	Construction: Less than Significant Operations: Less than Significant	None	Construction: Less than Significant Operations: Less than Significant
	Hawthorne Option	Construction: Less than Significant Operations: Less than Significant	None	Construction: Less than Significant Operations: Less than Significant
C. Would the Project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces?	LPA	Construction: Less than Significant Operations: Less than Significant	None	Construction: Less than Significant Operations: Less than Significant
	Elevated/At-Grade Alignment	Construction: Less than Significant Operations: Less than Significant	None	Construction: Less than Significant Operations: Less than Significant
	Trench Option	Construction: Less than Significant Operations: Less than Significant	None	Construction: Less than Significant Operations: Less than Significant
	Hawthorne Option	Construction: Less than Significant Operations: Less than Significant	None	Construction: Less than Significant Operations: Less than Significant

Environmental Impact	Alignment	Impact Before Mitigation	Proposed Mitigation Measures	Impact After Mitigation
Hydrology and Water Quality				
D. Would the Project, in flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?	LPA	Construction: Less than Significant Operations: Less than Significant	None	Construction: Less than Significant Operations: Less than Significant
	Elevated/At-Grade Alignment	Construction: Less than Significant Operations: Less than Significant	None	Construction: Less than Significant Operations: Less than Significant
	Trench Option	Construction: Less than Significant Operations: Less than Significant	None	Construction: Less than Significant Operations: Less than Significant
	Hawthorne Option	Construction: Less than Significant Operations: Less than Significant	None	Construction: Less than Significant Operations: Less than Significant
E. Would the Project conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	LPA	Construction: Less than Significant Operations: Less than Significant	None	Construction: Less than Significant Operations: Less than Significant
	Elevated/At-Grade Alignment	Construction: Less than Significant Operations: Less than Significant	None	Construction: Less than Significant Operations: Less than Significant
	Trench Option	Construction: Less than Significant Operations: Less than Significant	None	Construction: Less than Significant Operations: Less than Significant
	Hawthorne Option	Construction: Less than Significant Operations: Less than Significant	None	Construction: Less than Significant Operations: Less than Significant

Table ES-15. Summary of Utilities and Service Systems Impacts Evaluation

Environmental Impact	Alignment	Impact Before Mitigation	Proposed Mitigation Measures	Impact After Mitigation
Utilities and Service Systems				
A. Would the Project require or result in the relocation or construction of new or expanded water, wastewater treatment or stormwater drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?	LPA	Construction: Less than Significant Operations: Less than Significant	None	Construction: Less than Significant Operations: Less than Significant
	Elevated/At-Grade Alignment	Construction: Less than Significant Operations: Less than Significant	None	Construction: Less than Significant Operations: Less than Significant
	Trench Option	Construction: Less than Significant Operations: Less than Significant	None	Construction: Less than Significant Operations: Less than Significant
	Hawthorne Option	Construction: Less than Significant Operations: Less than Significant	None	Construction: Less than Significant Operations: Less than Significant
B. Would the Project have sufficient water supplies available to serve the Project and reasonably foreseeable future development during normal, dry and multiple dry years?	LPA	Construction: Less than Significant Operations: Less than Significant	None	Construction: Less than Significant Operations: Less than Significant
	Elevated/At-Grade Alignment	Construction: Less than Significant Operations: Less than Significant	None	Construction: Less than Significant Operations: Less than Significant
	Trench Option	Construction: Less than Significant Operations: Less than Significant	None	Construction: Less than Significant Operations: Less than Significant
	Hawthorne Option	Construction: Less than Significant Operations: Less than Significant	None	Construction: Less than Significant Operations: Less than Significant

Environmental Impact	Alignment	Impact Before Mitigation	Proposed Mitigation Measures	Impact After Mitigation
Utilities and Service Systems				
C. Would the Project result in a determination by the wastewater treatment provider which serves or may serve the Project that it has adequate capacity to serve the Project's Projected demand in addition to the provider's existing commitments?	LPA	Construction: Less than Significant Operations: Less than Significant	None	Construction: Less than Significant Operations: Less than Significant
	Elevated/At-Grade Alignment	Construction: Less than Significant Operations: No Impact	None	Construction: Less than Significant Operations: No Impact
	Trench Option	Construction: Less than Significant Operations: No Impact	None	Construction: Less than Significant Operations: No Impact
	Hawthorne Option	Construction: Less than Significant Operations: No Impact	None	Construction: Less than Significant Operations: No Impact
D. Would the Project generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?	LPA	Construction: Less than Significant Operations: No Impact	None	Construction: Less than Significant Operations: No Impact
	Elevated/At-Grade Alignment	Construction: Less than Significant Operations: No Impact	None	Construction: Less than Significant Operations: No Impact
	Trench Option	Construction: Less than Significant Operations: No Impact	None	Construction: Less than Significant Operations: No Impact
	Hawthorne Option	Construction: Less than Significant Operations: No Impact	None	Construction: Less than Significant Operations: No Impact
E. Would the Project comply with federal, state, and local management and reduction statutes and regulations related to solid waste?	LPA	Construction: No Impact Operations: No Impact	None	Construction: No Impact Operations: No Impact
	Elevated/At-Grade Alignment	Construction: No Impact Operations: No Impact	None	Construction: No Impact Operations: No Impact
	Trench Option	Construction: No Impact Operations: No Impact	None	Construction: No Impact Operations: No Impact
	Hawthorne Option	Construction: No Impact Operations: No Impact	None	Construction: No Impact Operations: No Impact

Table ES-16. Summary of Energy Impacts Evaluation

Environmental Impact	Alignment	Impact Before Mitigation	Proposed Mitigation Measures	Impact After Mitigation
Energy				
A. Would the Project result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources during project construction or operation?	LPA	Construction: Less than Significant Operations: Less than Significant	None	Construction: Less than Significant Operations: Less than Significant
	Elevated/At-Grade Alignment	Construction: Less than Significant Operations: Less than Significant	None	Construction: Less than Significant Operations: Less than Significant
	Trench Option	Construction: Less than Significant Operations: Less than Significant	None	Construction: Less than Significant Operations: Less than Significant
	Hawthorne Option	Construction: Less than Significant Operations: Less than Significant	None	Construction: Less than Significant Operations: Less than Significant
B. Would the Project conflict with or obstruct a State or local plan for renewable energy or energy efficiency?	LPA	Construction: Less than Significant Operations: Less than Significant	None	Construction: Less than Significant Operations: Less than Significant
	Elevated/At-Grade Alignment	Construction: Less than Significant Operations: Less than Significant	None	Construction: Less than Significant Operations: Less than Significant
	Trench Option	Construction: Less than Significant Operations: Less than Significant	None	Construction: Less than Significant Operations: Less than Significant
	Hawthorne Option	Construction: Less than Significant Operations: Less than Significant	None	Construction: Less than Significant Operations: Less than Significant

Table ES-17. Summary of Cultural Resources Impacts Evaluation

Environmental Impact	Alignment	Impact Before Mitigation	Proposed Mitigation Measures	Impact After Mitigation
Cultural Resources				
A. Would the Proposed Project cause a substantial adverse change in the significance of a historical resource pursuant to § 15064.5?	LPA	Construction: No Impact Operations: No Impact	None	Construction: No Impact Operations: No Impact
	Elevated/At-Grade Alignment	Construction: No Impact Operations: No Impact	None	Construction: No Impact Operations: No Impact
	Trench Option	Construction: No Impact Operations: No Impact	None	Construction: No Impact Operations: No Impact
	Hawthorne Option	Construction: Less than Significant Operations: Less than Significant	None	Construction: Less than Significant Operations: Less than Significant
B. Would the Project cause a substantial adverse change in the significance of an archaeological resource pursuant to § 15064.5?	LPA	**Construction: Significant** Operations: No Impact	Construction: MM-CUL-1: Cultural Resources Identification Training MM-CUL-2: Cultural Resources Monitoring and Mitigation Plan	Construction: Less than Significant Operations: No Impact
	Elevated/At-Grade Alignment	**Construction: Significant** Operations: No Impact	Construction: MM-CUL-1: Cultural Resources Identification Training MM-CUL-2: Cultural Resources Monitoring and Mitigation Plan	Construction: Less than Significant Operations: No Impact
	Trench Option	**Construction: Significant** Operations: No Impact	Construction: MM-CUL-1: Cultural Resources Identification Training	Construction: Less than Significant Operations: No Impact

Environmental Impact	Alignment	Impact Before Mitigation	Proposed Mitigation Measures	Impact After Mitigation
Cultural Resources				
			MM-CUL-2: Cultural Resources Monitoring and Mitigation Plan	
	Hawthorne Option	**Construction: Significant** Operations: No Impact	Construction: MM-CUL-1: Cultural Resources Identification Training MM-CUL-2: Cultural Resources Monitoring and Mitigation Plan	Construction: Less than Significant Operations: No Impact
C. Would the Project disturb any human remains, including those interred outside of formal cemeteries?	LPA	**Construction: Significant** Operations: No Impact	Construction: MM-CUL-3: Unanticipated Discovery of Human Remains	Construction: Less than Significant Operations: No Impact
	Elevated/At-Grade Alignment	**Construction: Significant** Operations: No Impact	Construction: MM-CUL-3: Unanticipated Discovery of Human Remains	Construction: Less than Significant Operations: No Impact
	Trench Option	**Construction: Significant** Operations: No Impact	Construction: MM-CUL-3: Unanticipated Discovery of Human Remains	Construction: Less than Significant Operations: No Impact
	Hawthorne Option	Construction: Less than Significant Operations: No Impact	None	Construction: Less than Significant Operations: No Impact

Table ES-18. Summary of Tribal Cultural Resources Impacts Evaluation

Environmental Impact	Alignment	Impact Before Mitigation	Proposed Mitigation Measures	Impact After Mitigation
Tribal Cultural Resources				
A. Would the Project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k)?	LPA	**Construction: Significant** Operations: Less than Significant	Construction: MM-TCR-1: Native American Monitoring MM-TCR-2: Unanticipated Discovery of Tribal Cultural Resource Objects (Non-Funerary/Non-Ceremonial) MM-TCR-3: Unanticipated Discovery of Human Remains and Associated Funerary or Ceremonial Objects	Construction: Less than Significant Operations: Less than Significant
	Elevated/At-Grade Alignment	**Construction: Significant** Operations: Less than Significant	Construction: MM-TCR-1: Native American Monitoring MM-TCR-2: Unanticipated Discovery of Tribal Cultural Resource Objects (Non-Funerary/Non-Ceremonial) MM-TCR-3: Unanticipated Discovery of Human Remains and Associated Funerary or Ceremonial Objects	Construction: Less than Significant Operations: Less than Significant

Environmental Impact	Alignment	Impact Before Mitigation	Proposed Mitigation Measures	Impact After Mitigation
Tribal Cultural Resources				
A. Would the Project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k)?	Trench Option	**Construction: Significant** Operations: Less than Significant	Construction: MM-TCR-1: Native American Monitoring MM-TCR-2: Unanticipated Discovery of Tribal Cultural Resource Objects (Non-Funerary/Non-Ceremonial) MM-TCR-3: Unanticipated Discovery of Human Remains and Associated Funerary or Ceremonial Objects	Construction: Less than Significant Operations: Less than Significant
	Hawthorne Option	**Construction: Significant** Operations: Less than Significant	Construction: MM-TCR-1: Native American Monitoring MM-TCR-2: Unanticipated Discovery of Tribal Cultural Resource Objects (Non-Funerary/Non-Ceremonial) MM-TCR-3: Unanticipated Discovery of Human Remains and Associated Funerary or Ceremonial Objects	Construction: Less than Significant Operations: Less than Significant

Environmental Impact	Alignment	Impact Before Mitigation	Proposed Mitigation Measures	Impact After Mitigation
Tribal Cultural Resources				
B. Would the Project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is a resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe?	LPA	**Construction: Significant** Operations: Less than Significant	Construction: MM-TCR-1: Native American Monitoring MM-TCR-2: Unanticipated Discovery of Tribal Cultural Resource Objects (Non-Funerary/Non-Ceremonial) MM-TCR-3: Unanticipated Discovery of Human Remains and Associated Funerary or Ceremonial Objects	Construction: Less than Significant Operations: Less than Significant
	Elevated/At-Grade Alignment	**Construction: Significant** Operations: Less than Significant	Construction: MM-TCR-1: Native American Monitoring MM-TCR-2: Unanticipated Discovery of Tribal Cultural Resource Objects (Non-Funerary/Non-Ceremonial) MM-TCR-3: Unanticipated Discovery of Human Remains and Associated Funerary or Ceremonial Objects	Construction: Less than Significant Operations: Less than Significant

Environmental Impact	Alignment	Impact Before Mitigation	Proposed Mitigation Measures	Impact After Mitigation
Tribal Cultural Resources				
B. Would the Project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is a resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe?	Trench Option	**Construction: Significant** Operations: Less than Significant	Construction: MM-TCR-1: Native American Monitoring MM-TCR-2: Unanticipated Discovery of Tribal Cultural Resource Objects (Non-Funerary/Non-Ceremonial) MM-TCR-3: Unanticipated Discovery of Human Remains and Associated Funerary or Ceremonial Objects	Construction: Less than Significant Operations: Less than Significant
	Hawthorne Option	**Construction: Significant** Operations: Less than Significant	Construction: MM-TCR-1: Native American Monitoring MM-TCR-2: Unanticipated Discovery of Tribal Cultural Resource Objects (Non-Funerary/Non-Ceremonial) MM-TCR-3: Unanticipated Discovery of Human Remains and Associated Funerary or Ceremonial Objects	Construction: Less than Significant Operations: Less than Significant

Table ES-19. Summary of Public Services Impacts Evaluation

Environmental Impact	Alignment	Impact Before Mitigation	Proposed Mitigation Measures	Impact After Mitigation
Public Services				
A. Would the Project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for: i. fire protection; ii. police protection; iii. schools; iv. parks; v. libraries?	Trench Option	Construction: Less than Significant Operations: Less than Significant	None	Construction: Less than Significant Operations: Less than Significant
	Elevated/At-Grade Alignment	Construction: Less than Significant Operations: Less than Significant	None	Construction: Less than Significant Operations: Less than Significant
	Trench Option	Construction: Less than Significant Operations: Less than Significant	None	Construction: Less than Significant Operations: Less than Significant
	Hawthorne Option	Construction: Less than Significant Operations: Less than Significant	None	Construction: Less than Significant Operations: Less than Significant

Environmental Impact	Alignment	Impact Before Mitigation	Proposed Mitigation Measures	Impact After Mitigation
Public Services				
B. Would the Project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	LPA	Construction: Less than Significant Operations: Less than Significant	None	Construction: Less than Significant Operations: Less than Significant
	Elevated/At-Grade Alignment	Construction: Less than Significant Operations: Less than Significant	None	Construction: Less than Significant Operations: Less than Significant
	Trench Option	Construction: Less than Significant Operations: Less than Significant	None	Construction: Less than Significant Operations: Less than Significant
	Hawthorne Option	Construction: Less than Significant Operations: Less than Significant	None	Construction: Less than Significant Operations: Less than Significant
C. Does the Project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?	LPA	Construction: Less than Significant Operations: Less than Significant	None	Construction: Less than Significant Operations: Less than Significant
	Elevated/At-Grade Alignment	Construction: Less than Significant Operations: Less than Significant	None	Construction: Less than Significant Operations: Less than Significant
	Trench Option	Construction: Less than Significant Operations: Less than Significant	None	Construction: Less than Significant Operations: Less than Significant
	Hawthorne Option	Construction: Less than Significant Operations: No Impact	None	Construction: Less than Significant Operations: No Impact

1. INTRODUCTION

This Final Environmental Impact Report (EIR) has been prepared in compliance with the California Environmental Quality Act (CEQA) (Pub. Resources Code, § 21000 et seq.) and the State CEQA Guidelines (14 Cal. Code. Regs., § 15000 et seq.). This Final EIR responds to comments received on the Draft EIR and incorporates revisions and clarifications where appropriate. The complete EIR will consist of the Draft EIR and the Final EIR, including responses to comments.

After completion of the Final EIR, the Metro Board of Directors (Board) may certify the Final EIR, adopt a Mitigation Monitoring and Reporting Program (MMRP) for the project, issue findings on the project's environmental impacts following the implementation of mitigation measures, adopt a statement of overriding considerations, and approve the project.

1.1. BACKGROUND

On May 23, 2024, the Metro Board identified the 170th/182nd Grade-Separated Light Rail Transit Alternative, also known as the Hybrid Alternative, as the Locally Preferred Alternative (LPA) for the C Line Extension to Torrance Project. This Final EIR reflects the identification of the Hybrid Alternative as the LPA and includes a summary of refinements made to the design of the project in Chapter 3, Design Refinements, of this Final EIR.

The project would extend light rail transit service approximately 4.5 miles from the existing Redondo Beach (Marine) Station southeast along the Metro-owned Harbor Subdivision freight railroad right-of-way (Metro ROW) to the Mary K. Giordano Regional Transit Center in Torrance with two new stations.

The project historically has been envisioned as an extension of the existing Metro C Line (Green), and therefore the Draft EIR and this Final EIR refer to it as the C Line Extension. However, based on operating plans approved by the Metro Board in Fall 2024, the project would ultimately operate as a southern extension of the Metro K Line, further connecting the Metro system further into the South Bay. The project would provide direct connections between local transit hubs and the regional transit network. The Project Area is primarily urbanized and includes portions of the Cities of Hawthorne, Lawndale, Redondo Beach, and Torrance.

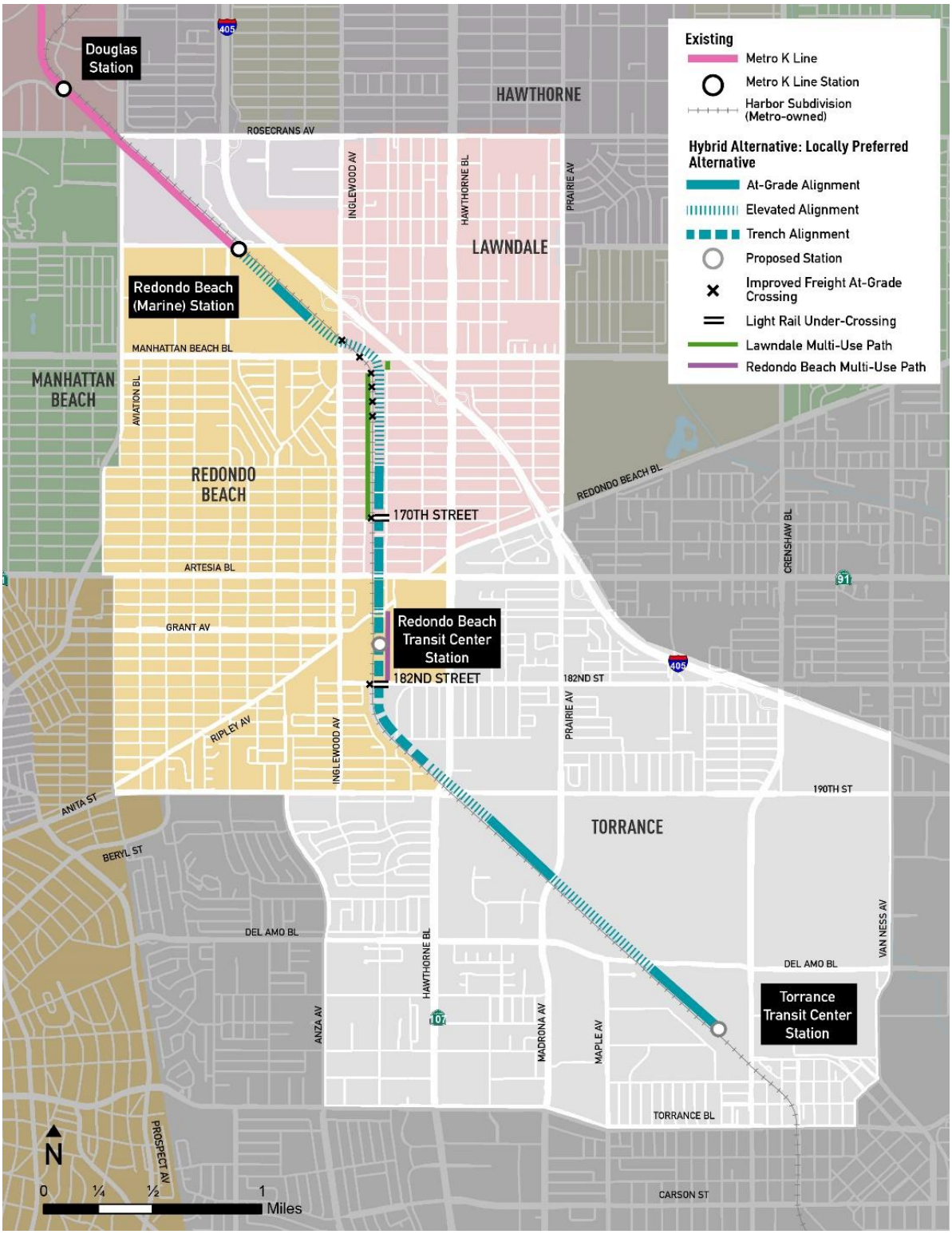
While the project extends the K Line, rather than the C Line, this change in system operations does not change the anticipated number of trains, their operations throughout the course of a typical day, maintenance schedules or facility needs, or infrastructure needs.

The project has evolved over the years based on several planning studies and the scoping process, which are discussed in greater detail in the Alternatives Considered and Eliminated Report, published concurrently with the Draft EIR (Metro, 2023). A variety of potential alternatives that satisfy the project's purpose and need were assessed and refined during the screening and project refinement stages of the Draft EIR process. The Draft EIR identified and evaluated the Elevated/At-Grade Alignment as the Proposed Project with two options north of 190th Street: the Trench Option and Hawthorne Option. In accordance with CEQA guidelines Section 15126.6(a), the Draft EIR also included three Project Alternatives (No Project Alternative, High Frequency Bus Alternative, and 170th/182nd Grade-Separated Light Rail Transit Alternative (Hybrid Alternative)).

The Draft EIR was released to the public in January 2023. During a 61-day public comment period, Metro received approximately 2,200 comment submissions in the form of emails, voicemails, oral comments at public hearings, comment cards, letters, surveys, and petitions. After reviewing technical studies and comments on the Draft EIR, Metro staff recommended the 170th/182nd Grade-Separated Light Rail Transit Alternative (Hybrid Alternative) as the LPA since it best provides local and regional benefits, meets project needs and objectives, and addresses community concerns. Metro presented the staff recommendation to the Metro Planning & Programming Committee in April 2024 and the full Metro Board in May 2024. Both meetings allowed for public comment. At the May 2024 meeting, the Metro Board selected the Hybrid Alternative as the LPA and directed Metro to complete a Final EIR.

An overview of the LPA is shown in Figure 1-1.

Figure 1-1. Hybrid Alternative/Locally Preferred Alternative



Source: STV, 2025

2 DESCRIPTION OF THE LOCALLY PREFERRED ALTERNATIVE

2.1 OVERVIEW AND HISTORY

The Los Angeles County Metropolitan Transportation Authority (Metro) proposes extending its existing light rail transit system to the South Bay. The project is officially referred to as the C Line (Green) Extension to Torrance Project, though due to recent service changes, the project would now function as an extension of the K Line. Specifically, on June 6, 2025 (subsequent to the completion of the Draft EIR), Metro implemented service changes that redirected the C Line to terminate at the LAX/Metro Transit Center, with the K Line assuming operations along the C Line's former west segment from the Aviation/Century Station to the Redondo Beach (Marine) Station. As a result, the segment proposed for extension would be part of the K Line's operational alignment, although the project's official name remains unchanged. Importantly, this change does not alter the adequacy of how the proposed alignment options and alternatives were studied in the Draft EIR, as the project was and still is proposed to include extension of light rail transit service from the existing Redondo Beach (Marine) Metro K Line (formerly C Line) Station to the Mary K. Giordano Regional Transit Center (Torrance TC).

The Draft EIR evaluated the Proposed Project (referred to in this Final EIR as the Elevated/At-Grade Alignment), and two options north of 190th Street called the Trench Option and the Hawthorne Option. It also evaluated three alternatives under the California Environmental Quality Act (CEQA): the No Project Alternative, the High-Frequency Bus Alternative, and the 170th/182nd Grade-Separated Light Rail Transit Alternative (also referred to as the Hybrid Alternative).

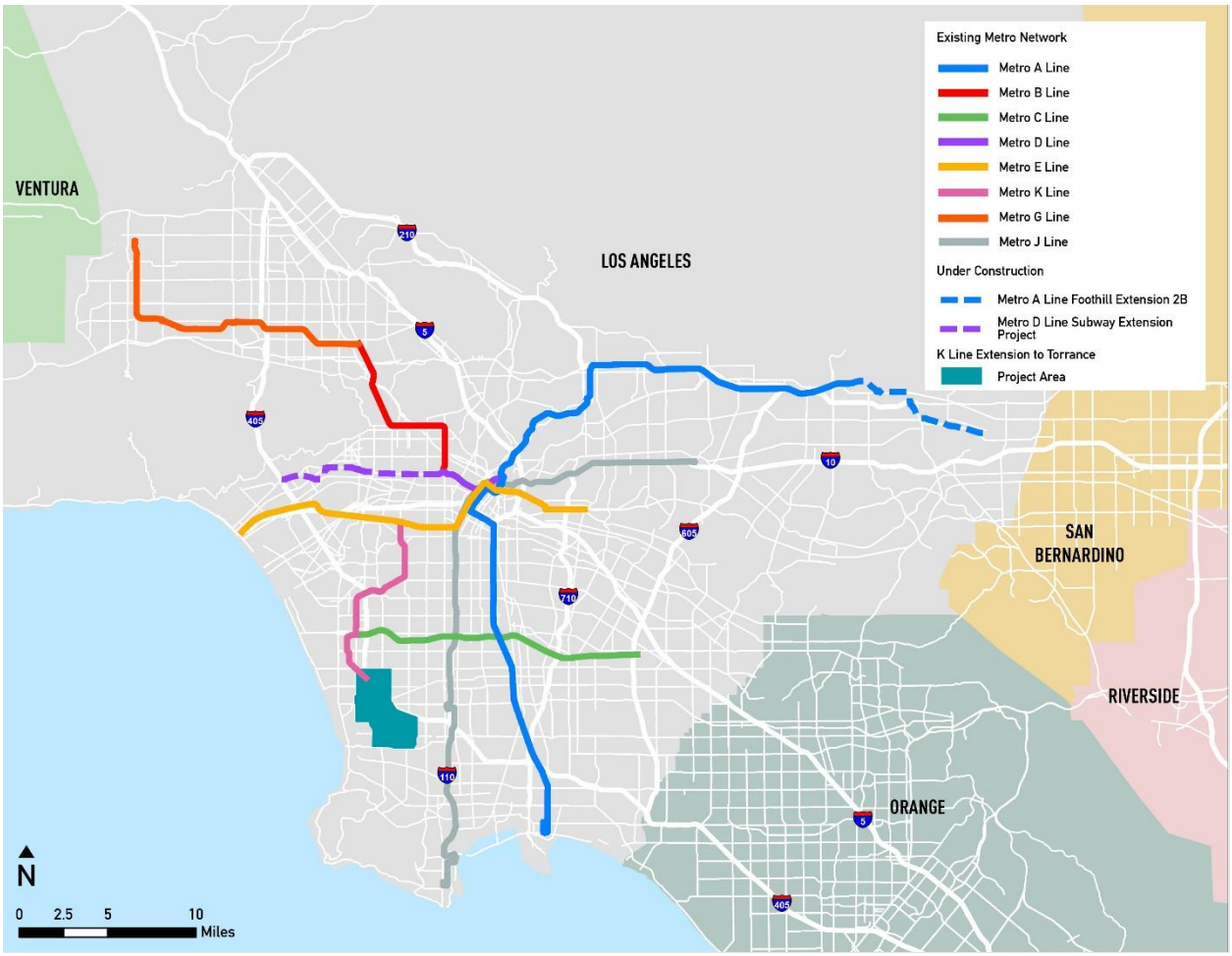
On May 23, 2024, the Metro Board of Directors (Metro Board) selected the 170th/182nd Grade-Separated Light Rail Transit Alternative (Hybrid Alternative) as the Locally Preferred Alternative (LPA). At the same meeting, the Metro Board adopted a motion to prepare the Final EIR under CEQA, complete studies to respond fully to public comments received on the Draft EIR, and refine cost estimates and the funding plan for the LPA. Since then, Metro completed studies, continued stakeholder coordination and progressed conceptual engineering on the LPA, which resulted in design refinements. This chapter provides updated details on the LPA. Refer also to Chapter 3, Design Refinements, of this Final EIR for additional information on the design refinements made during this process.

2.1-1 Project Location and Surrounding Uses

Figure 2.1-1 shows the project location within the South Bay region of Los Angeles County. Figure 2.1-2 shows the Project Area, which follows the Metro-owned railroad right-of-way (Metro ROW) along a 4.5-mile north-south corridor from the existing Redondo Beach (Marine) Metro K Line Station traveling southeast to the Torrance TC. The LPA would travel through the cities of Lawndale, Redondo Beach, and Torrance. The boundaries of the Project Area form roughly a one-mile buffer around the Metro ROW, with the borders generally following city limits and/or major roadways. A one-mile buffer is generally the area in which potential benefits and ridership of a major transportation project are likely to be focused.

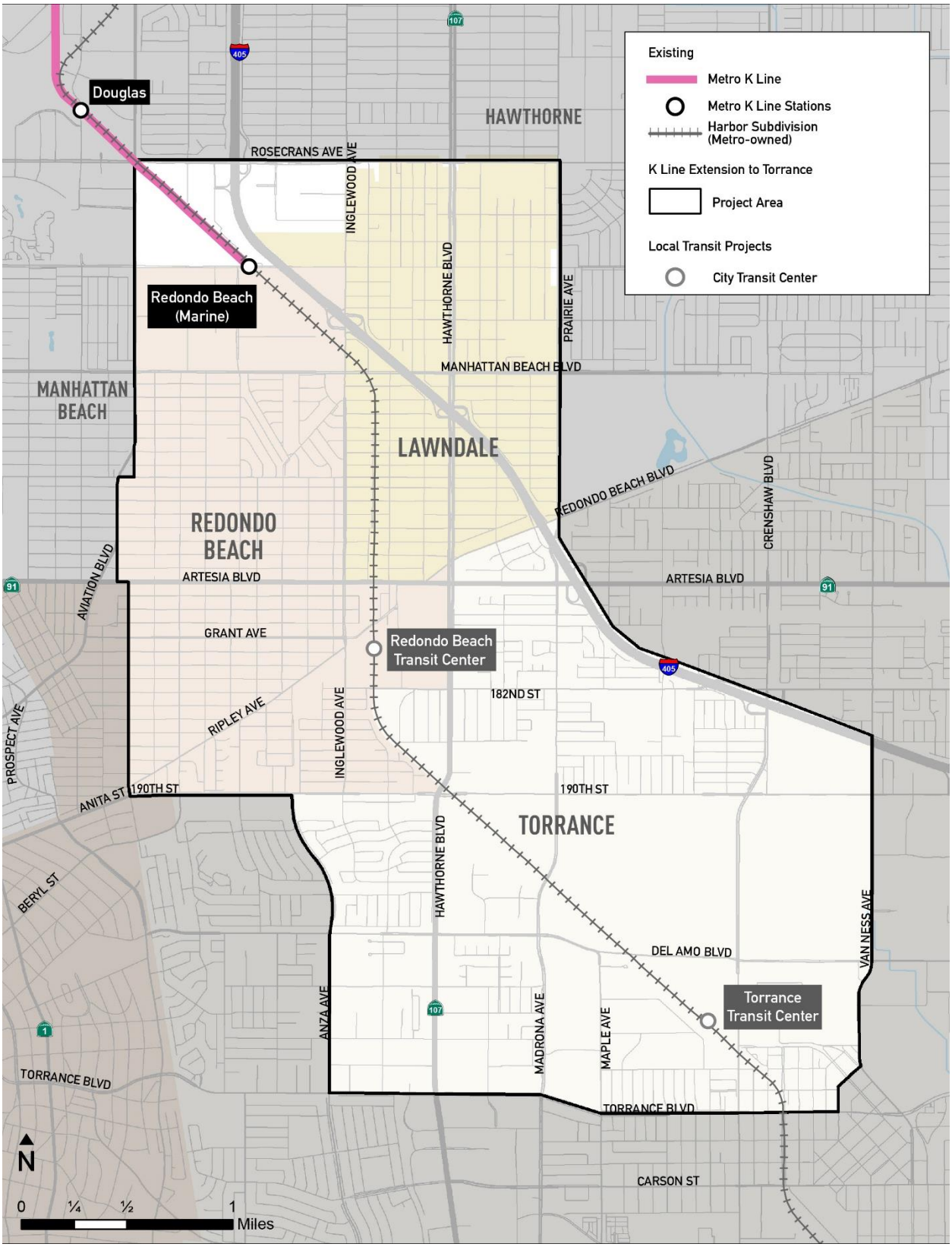
The land uses of the Project Area are comprised of single-family and multi-family residential neighborhoods, industrial and institutional uses, as well as commercial and recreational areas. The Project Area includes two high-capacity bus transit centers, the Redondo Beach Transit Center (Redondo Beach TC) and the Torrance TC.

Figure 2.1-1. Project Location and Regional Vicinity



Source: Metro, STV, 2025

Figure 2.1-2. Project Area



Source: Metro, STV, 2025

2.1-2 Project History

Metro purchased the Harbor Subdivision railroad corridor from the precursor to the BNSF Railway in the early 1990s. It currently carries limited freight traffic through the Study Area, typically one or two trains a day. A number of studies have examined the potential for transit service along all or portions of the Metro ROW, which are described below.

- **Metro Harbor Subdivision Transit Corridor Alternatives Analysis (AA) Study (2009)** – Metro completed an AA study evaluating various transit options along the Metro ROW between Downtown Los Angeles, Los Angeles International Airport (LAX), and the Ports of Los Angeles and Long Beach. The 2009 Study analyzed various transit modal options such as light rail transit, bus rapid transit, self-propelled railcar, electric multiple unit vehicles, and commuter rail transit. The segment between the Redondo Beach (Marine) Station and the Torrance TC emerged as the highest-priority project, with light rail as the preferred mode. The Freight Track Alternative was also recommended for further study. In December 2009, the Metro Board approved the preparation of a Draft Environmental Impact Statement (EIS)/EIR for the Project.
- **South Bay Metro Green Line Extension Draft EIS/EIR (2010 to 2014)** – Metro held scoping meetings for the South Bay Metro Green Line Extension EIS/EIR in 2010 and began conducting environmental analysis on the two alternatives recommended in the 2009 AA (a light rail alternative and a freight track alternative). Several alternatives and alignment options were considered during the preparation of the Draft EIS/EIR, but were removed from further study for several reasons, including poor cost effectiveness, lack of public support, and/or substantial environmental impacts. Alternatives and options removed from further study included the Freight Track Alternative, several light rail alignment options, and several maintenance facility options. After the failure of Measure J in November 2012, the Project was put on hold due to funding uncertainty.
- **Green Line Extension to Torrance Supplemental Alternatives Analysis (SAA) (2017 to 2018)** – Measure M was passed in November 2016, which provided a source of funding for the Project in addition to the previously allocated funding from Measure R, passed in 2008. In spring 2017, Metro reinitiated the Project with an SAA, which renamed the Project as the Green Line Extension to Torrance Project. With the elimination of the Freight Track Alternative in 2011, the Project Area was reduced to focus on the area potentially affected by the light rail alternative. The revised Project Area boundaries focused on the 4.5-mile segment of the Metro ROW from the existing Redondo Beach (Marine) Station to the Torrance TC. The SAA study focused on soliciting feedback from corridor cities and stakeholders to refine and update alternatives previously identified in the 2009 AA and 2010-2014 Draft EIS/EIR. Its goal was to gain consensus on revised alternatives for the Project. On September 27, 2018, the Metro Board voted to approve two alternatives to be carried forward for environmental analysis: the Metro ROW and the Hawthorne Boulevard alignment (both primarily at-grade alignments).
- **C Line (Green) Extension to Torrance Draft EIR (2018 to 2024)** – A Notice of Completion and Availability of the Draft EIR was issued on January 26, 2023, initiating a 61-day public comment period, ending March 27, 2023. During the public comment period, Metro received over 2,000 comment submissions in the form of emails, voicemails, oral comments at public hearings, comment cards, letters, surveys, and petitions. See Appendix C. These comments reflected a wide range of perspectives from community members, stakeholders, and agencies. After reviewing the extensive public input and the findings from technical studies presented in the Draft EIR, Metro staff recommended that the Metro Board select the 170th/182nd Grade-Separated Light Rail Transit Alternative (Hybrid Alternative) as the LPA. This recommendation was based on several factors,

including the Hybrid Alternative's local and regional benefits, its ability to meet the project objectives, and its responsiveness to community concerns and preferences.[1]

> **C Line (Green) Extension to Torrance Final EIR (2024 to present)** – The Final EIR provides additional details on the LPA and describes project design refinements developed in response to feedback received during the Draft EIR comment period through coordination with stakeholders, including public agencies, and as part of the ongoing advancement of the project design. Project design refinements and analysis of their potential environmental impacts are described in Chapter 3, Design Refinements, of the Final EIR. As discussed therein, the design refinements do not change the impact conclusions of the Draft EIR.

2.2 Project Objectives

The underlying purpose of the project is to provide high-capacity transit service in the South Bay. Metro has identified the following project objectives:

> Improve mobility within the South Bay and encourage mode shift by:
  - Introducing high-frequency transit service options from the current C Line terminus south to Torrance.
  - Creating direct connections between the regional transit network and local transit hubs for convenient transfers.
  - Providing an alternative mode of transportation for commuters traveling along congested arterials and I-405.
  - Providing first-last mile facilities to connect neighborhoods to station areas.

> Reduce air pollution and greenhouse gas emissions by making transit a more viable transportation choice.

> Avoid and minimize environmental impacts on environmental resources to the maximum extent feasible.

> Provide a cost-effective project.

> Provide more equitable access to regional destinations by improving connections to the Metro regional rail system.

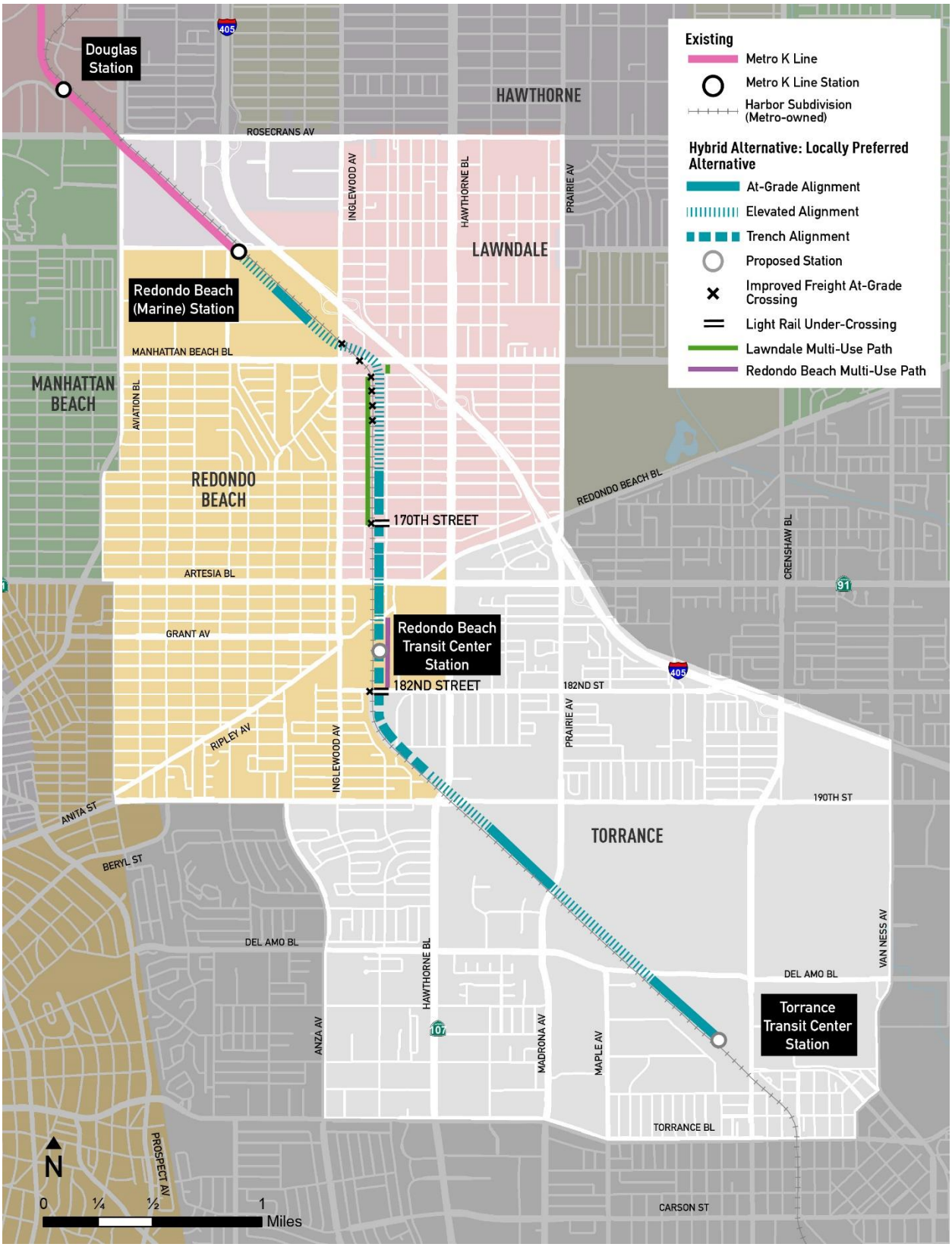
2.3 Description of the Locally Preferred Alternative

As previously discussed, the 170th/182nd Grade-Separated Light Rail Transit Alternative evaluated in Chapter 4, Evaluation of Alternatives, in the Draft EIR was selected by the Metro Board as the LPA. The LPA would extend the Metro K Line (formerly C Line) approximately 4.5 miles to the south by providing a light rail line that follows the existing Metro ROW for the length of the alignment. Two new light rail transit stations are proposed: the Redondo Beach TC Station and the Torrance TC Station. Figure 2.3-1 shows an overview of the LPA. Between the existing Redondo Beach (Marine) Station and 190th Street, within the Metro ROW, BNSF operates a single freight track. As part of the LPA, Metro proposes constructing two new light rail tracks and relocating the existing freight track in certain areas within the

[1] The Board Report for the May 23, 2024 Metro Regular Board Meeting describing the reasons supporting staff's recommendation for the LPA is available at: https://datamade-metro-pdf-merger.s3.amazonaws.com/2024-0272.pdf (as of August 26, 2025).

Metro ROW. This is discussed in greater detail below. The LPA also includes multi-use recreational paths within the Metro ROW, where there is sufficient room, as discussed further below. South of 190th Street, BNSF and Metro share ownership of the freight corridor. Metro owns a strip of land in the railroad ROW approximately 15 feet in width, and would acquire or lease additional ROW from BNSF to accommodate two new light rail tracks between 190th Street and the Torrance TC Station, while ensuring BNSF can maintain freight operations. Detailed drawings of the LPA are provided in Appendix B, Select Advanced Conceptual Engineering Drawings for the Hybrid/Locally Preferred Alternative, of this Final EIR.

Figure 2.3-1. Locally Preferred Alternative – Overview

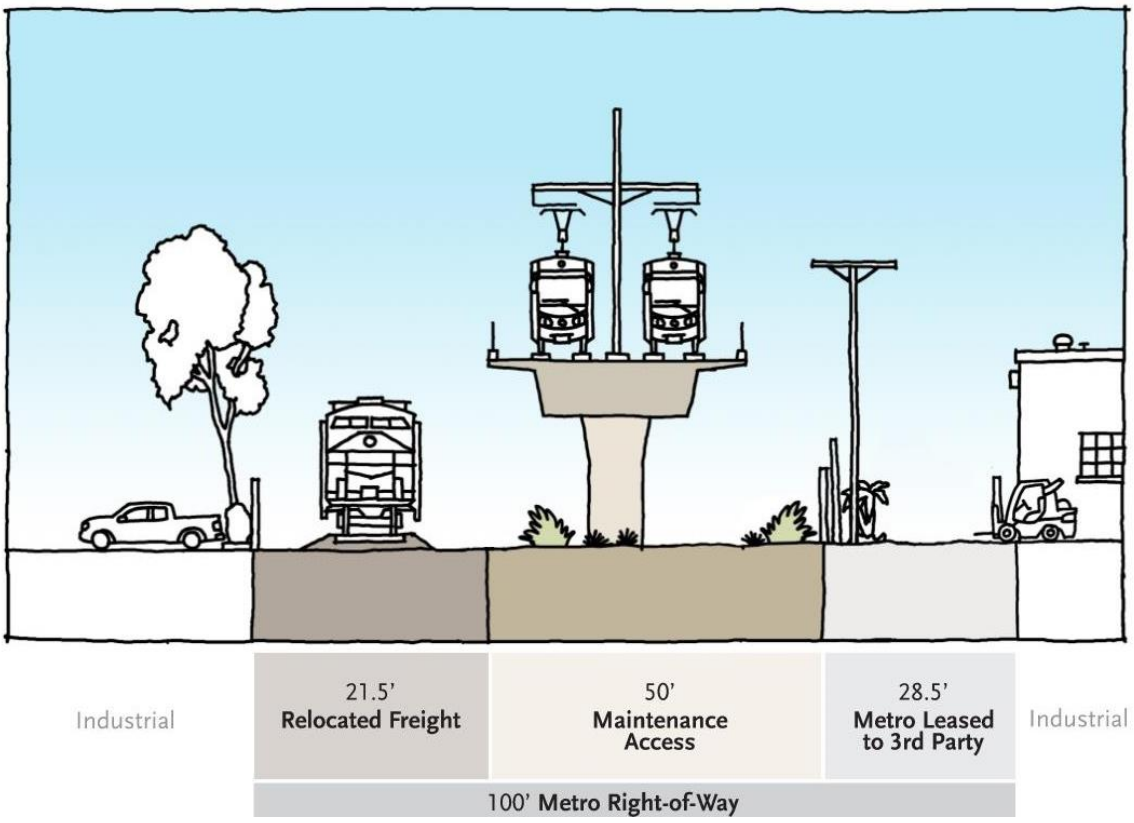


Source: STV, 2025

2.3-1 Alignment

The LPA would begin at the existing Redondo Beach (Marine) Station, where the existing light rail tracks and station are elevated above street level in a guideway supported by columns. The LPA would continue south in an elevated configuration within the existing Metro ROW, running parallel to and west of the existing freight tracks, which run at-grade (street level). Approximately 400 feet south of the station, the light rail tracks would descend and travel at-grade for approximately 800 feet to avoid overhead power lines. The light rail would then ascend back up to an elevated structure to cross over Inglewood Avenue and Manhattan Beach Boulevard into the City of Lawndale (Figure 2.3-2). Just south of Manhattan Beach Boulevard, the light rail guideway would cross over the existing freight tracks and shift to travel along the east side of the Metro ROW as it continues south. The existing freight track crossings at Inglewood Avenue and Manhattan Beach Boulevard would be rebuilt and shifted to the east within the Metro ROW while remaining at-grade.

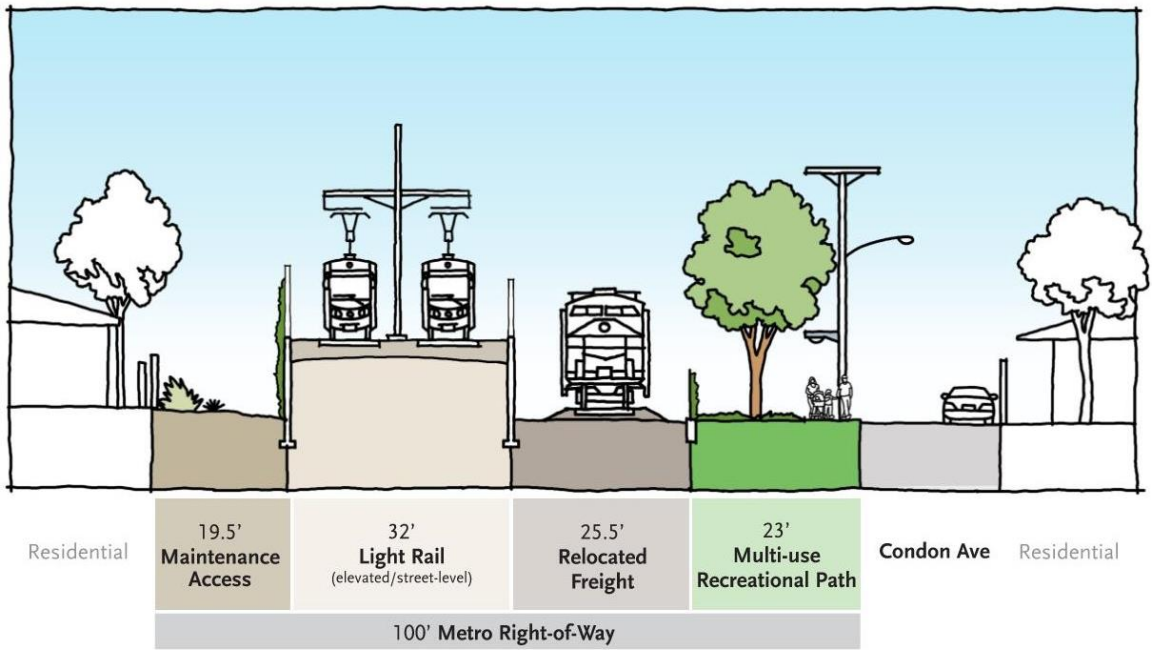
Figure 2.3-2. Locally Preferred Alternative – Looking South Between Inglewood Avenue and Manhattan Beach Boulevard



Source: Cityworks Design, 2025
Dimensions are preliminary and subject to refinement in future phases of design.
Corresponds to Cross-Section D in Appendix B.
Area of Metro ROW leased to 3rd party varies in this area.

Continuing south, the light rail tracks would cross over 159th Street, 160th Street, 161st Street, and 162nd Street on an elevated structure supported by columns, and then would descend on retained fill[2] until it reaches street level to near 165th Street. The retained fill section is shown in Figure 2.3-3. The light rail alignment would travel at-grade from 165th to 168th Street, as shown in Figure 2.3-4. South of 168th Street, the light rail would transition into an open-air trench configuration to pass below 170th Street at a depth of up to approximately 20 feet, as shown in Figure 2.3-5.

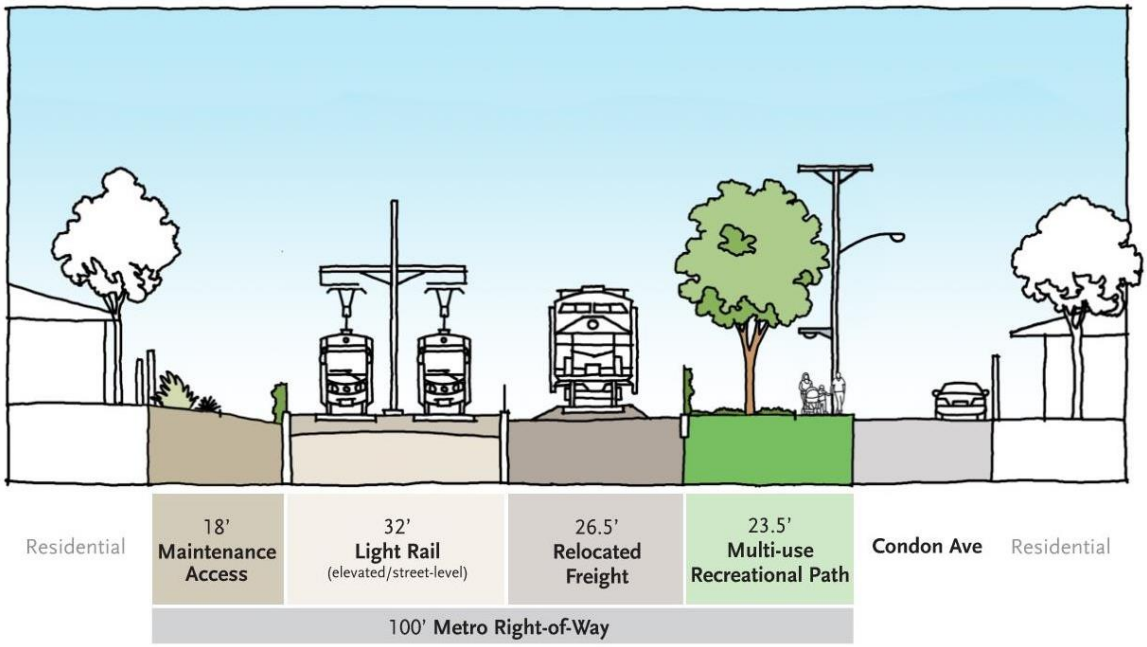
Figure 2.3-3. Locally Preferred Alternative – Looking South of 162nd Street



Source: Cityworks Design, 2025
Dimensions are preliminary and subject to refinement in future phases of design.
Corresponds with Cross Section G in Appendix B.

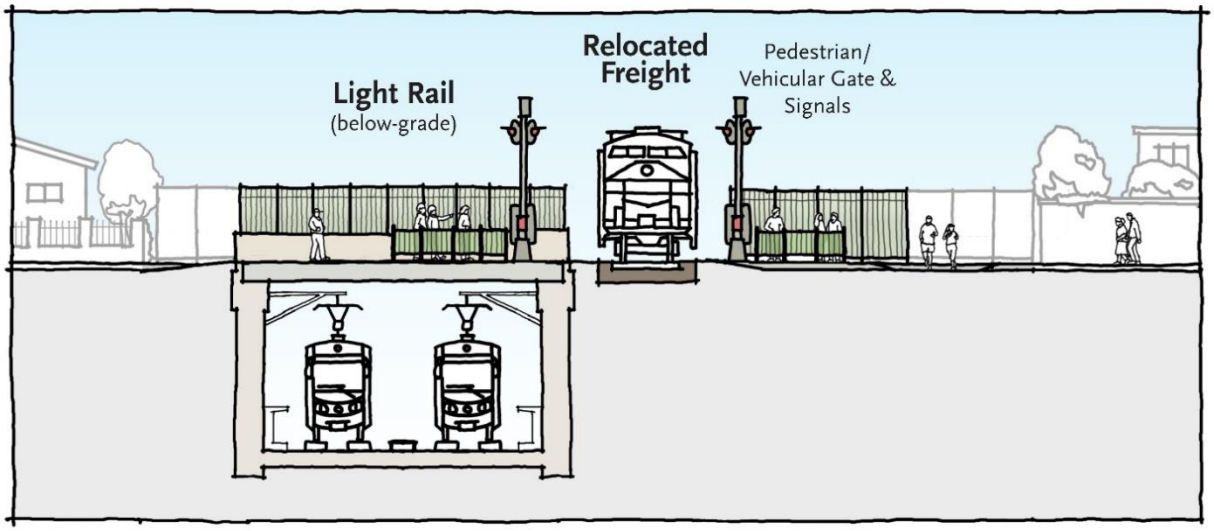
[2] The retained fill would be an elevated platform made of reinforced walls, which are filled with soil material.

Figure 2.3-4. Locally Preferred Alternative – Looking South Between 165th Street and 168th Street



Source: Cityworks Design, 2025
Dimensions are preliminary and subject to refinement in future phases of design.
Corresponds with Cross-Section H in Appendix B.

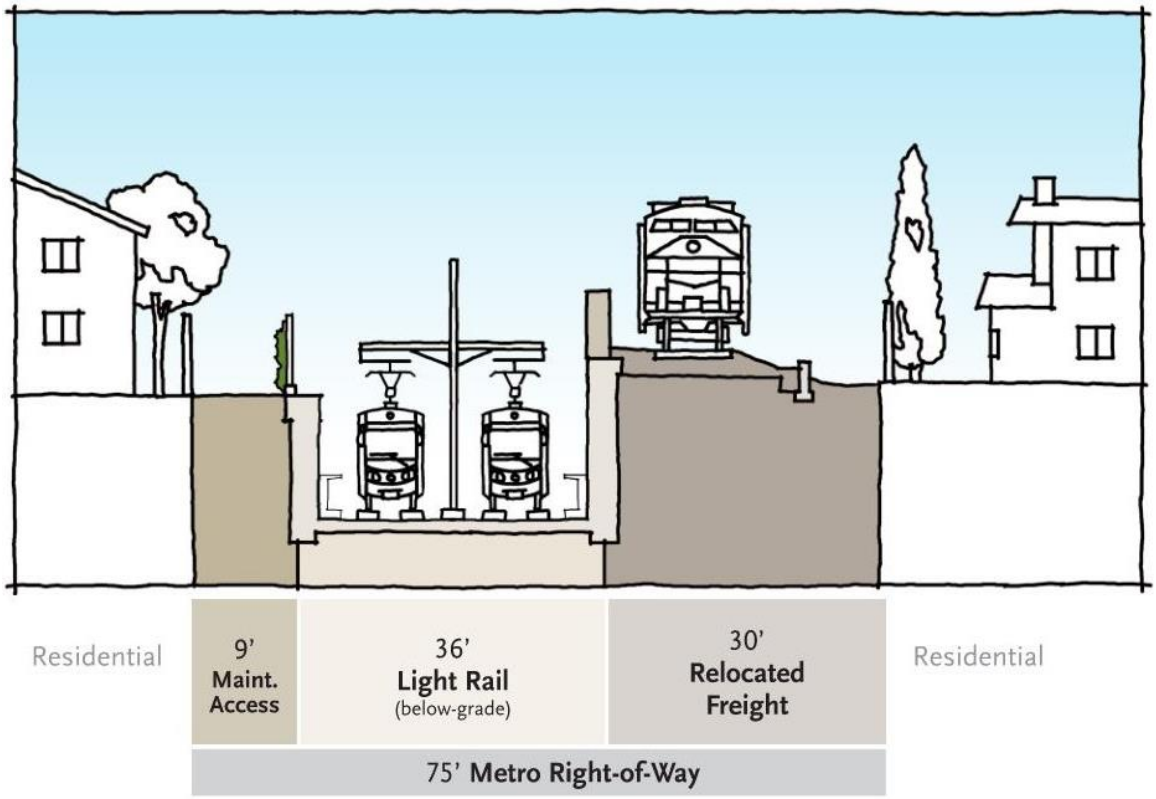
Figure 2.3-5. Locally Preferred Alternative – Looking South at 170th Street Bridge



Source: Cityworks Design, 2025
Corresponds with Cross-Section H.1 in Appendix B.

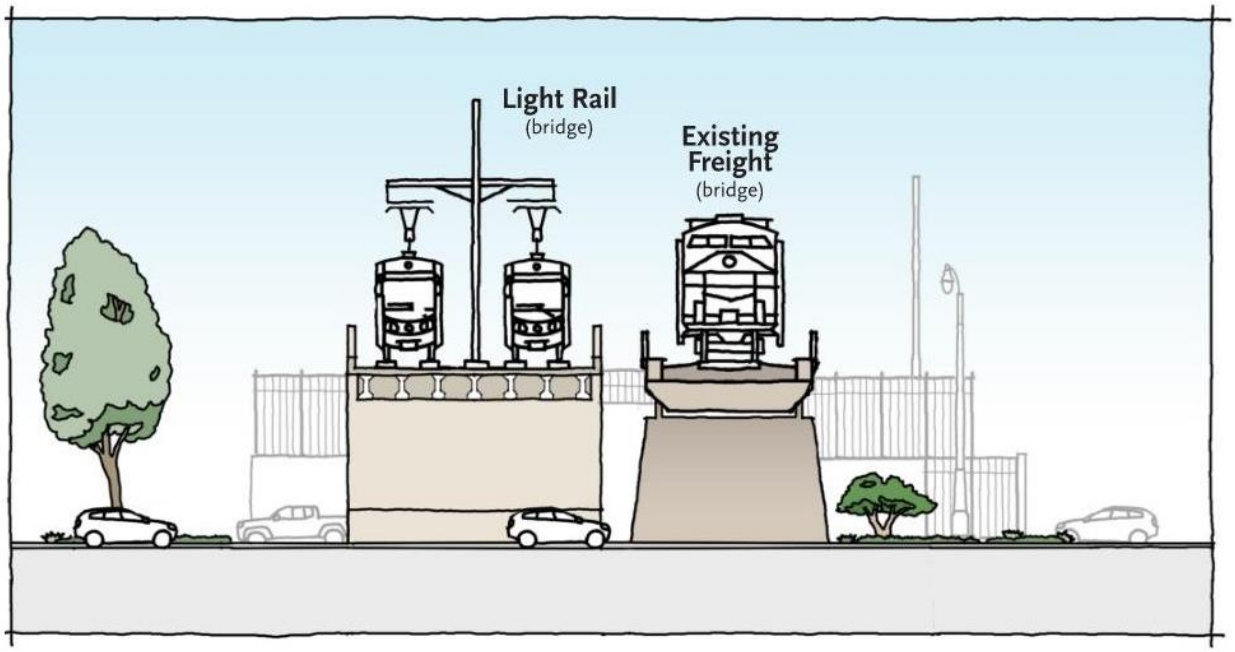
After crossing under 170th Street (Figure 2.3-6), the light rail tracks would ascend to at-grade, near 172nd Street before crossing Artesia Boulevard into the City of Redondo Beach on a new light rail bridge adjacent to the existing freight bridge (seen in Figure 2.3-7). South of 170th Street, the ROW width narrows from 100 feet to 75 feet.

Figure 2.3-6. Locally Preferred Alternative – Looking South of 170th Street



Source: Cityworks Design, 2025
Dimensions are preliminary and subject to refinement in future phases of design.
Corresponds with Cross-Section H.2 in Appendix B.

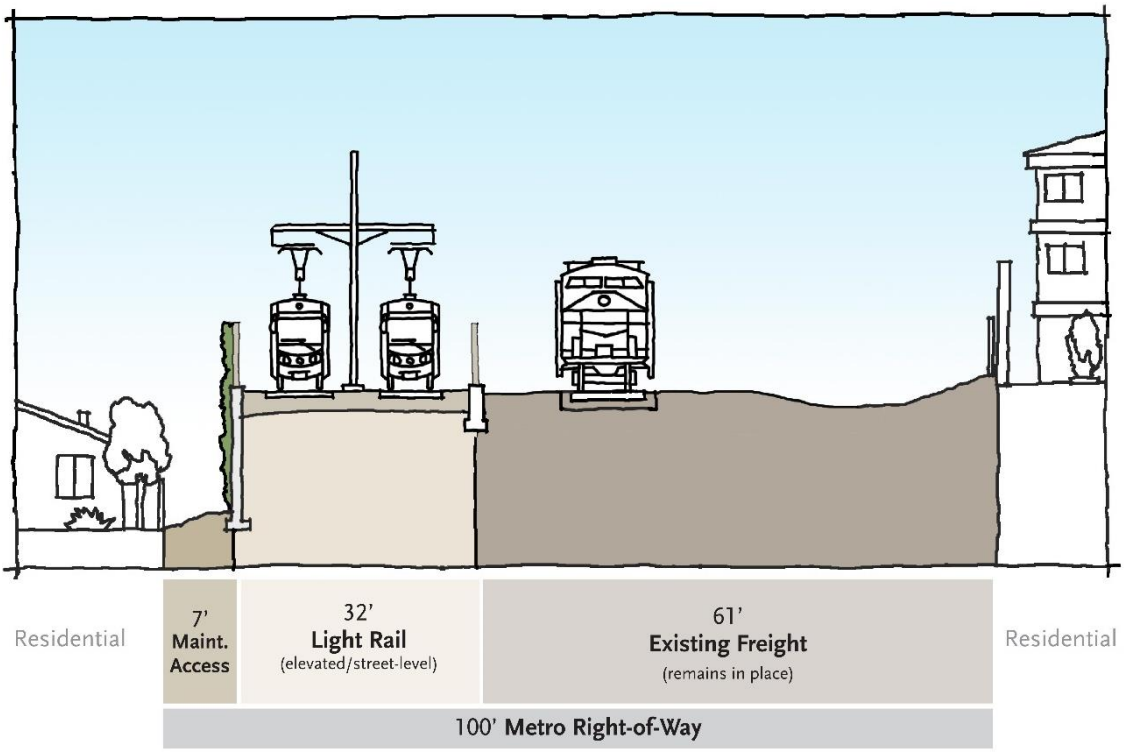
Figure 2.3-7. Locally Preferred Alternative – Looking South at Artesia Boulevard Bridge



Source: Cityworks Design, 2025
Corresponds with Cross-Section I in Appendix B.

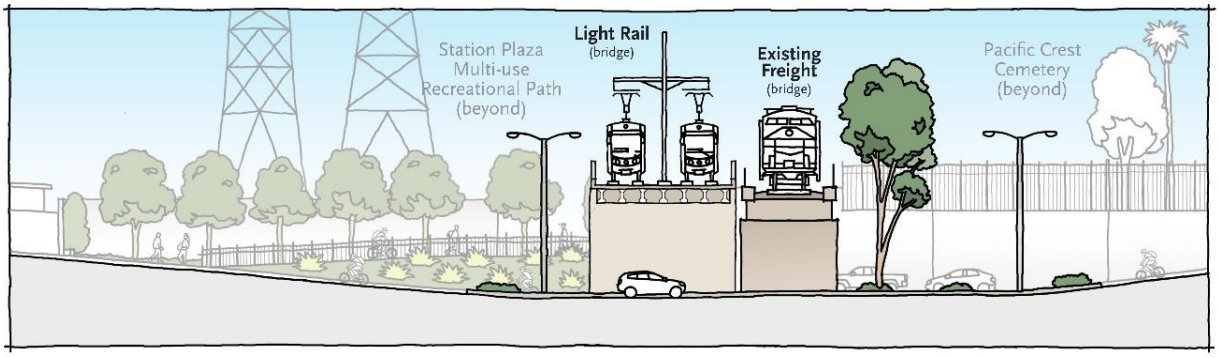
South of Artesia Boulevard, the light rail tracks would continue at-grade, as shown in Figure 2.3-8. The light rail tracks would cross over Grant Avenue on a new light rail bridge parallel to the existing freight rail bridge, as shown in Figure 2.3-9, before descending to reach the Redondo Beach TC Station.

Figure 2.3-8. Locally Preferred Alternative – Looking South between Artesia Boulevard and Grant Avenue



Source: Cityworks Design, 2025
Dimensions are preliminary and subject to refinement in future phases of design.
Corresponds with Cross-Section J in Appendix B.

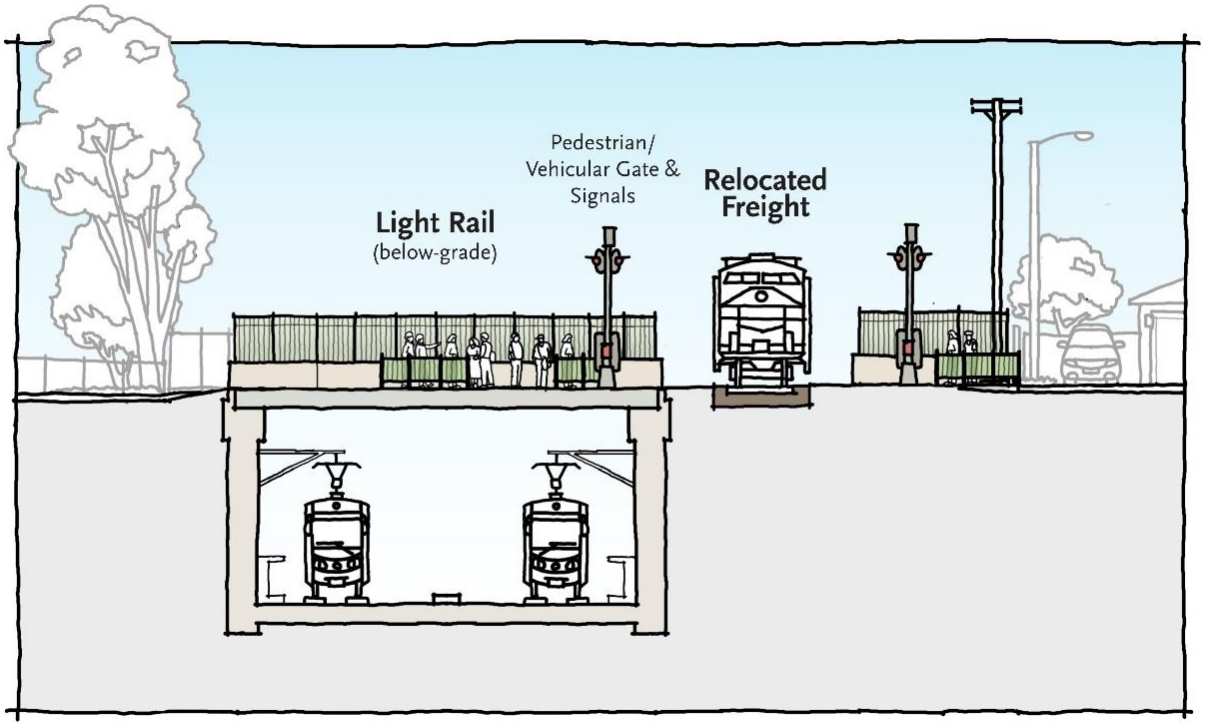
Figure 2.3-9. Locally Preferred Alternative – Looking South at Grant Avenue Bridge



Source: Cityworks Design, 2025
Corresponds with Cross-Section K in Appendix B.

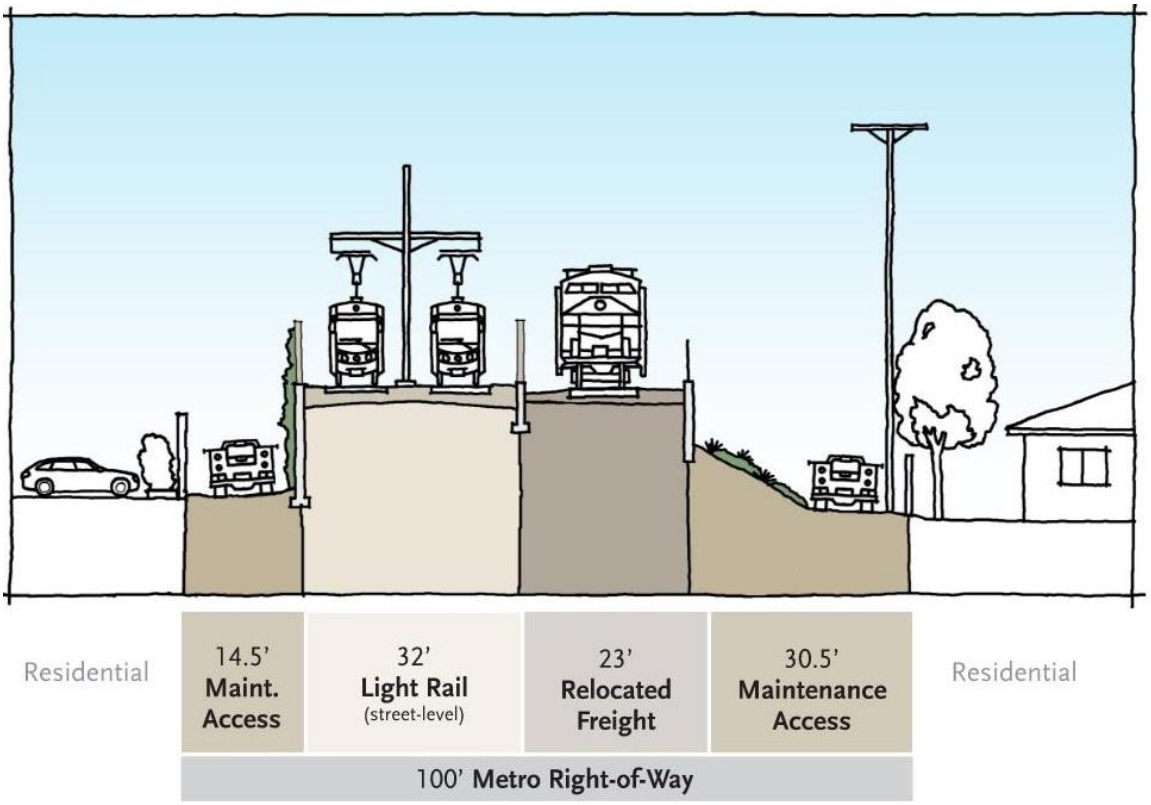
The Redondo Beach TC Station would be below street level to accommodate the light rail tracks crossing under 182nd Street, as shown in Figure 2.3-10, discussed in more detail in Section 2.3-4. From the Redondo Beach TC Station, the light rail tracks would continue descending in a trench to cross under 182nd Street. The trench would descend as low as approximately 20 feet deep at this crossing before the light rail tracks ascend back to at-grade, as shown in Figure 2.3-11.

Figure 2.3-10. Locally Preferred Alternative – Looking South at 182nd Street



Source: Cityworks Design, 2025
Corresponds with Cross-Section M in Appendix B.

Figure 2.3-11. Locally Preferred Alternative – Looking South Along ROW Between 186th Street and Hawthorne Boulevard



Source: Cityworks Design, 2025
Dimensions are preliminary and subject to refinement in future phases of design.
Corresponds with Cross-Section P in Appendix B.

South of 182nd Street, the light rail continues south along the ROW, then crosses over Hawthorne Boulevard and 190th Street on new bridges parallel to the existing freight bridges. South of 190th Street, the light rail tracks would travel at-grade within the Metro ROW, pass under the Prairie Avenue bridge, and ascend onto an elevated structure to accommodate freight movements below. This elevated light rail structure is required to maintain freight operations, as described in more detail in Section 2.3-1.1. The tracks would then begin to descend toward grade in order to travel under Del Amo Boulevard. South of Del Amo Boulevard, the light rail tracks would continue at-grade and end at a terminus station adjacent to the Torrance TC, just west of where the Metro ROW meets Crenshaw Boulevard. Tail tracks, which can be used for train car parking, storing, or reversing the direction of the light rail trains, would extend beyond the station platform and end west of Crenshaw Boulevard.

The entire light rail guideway would be secured, either with a fence, a combination of a fence on top of a low wall, or a sound wall, in areas where noise mitigation is proposed.

Utility lines, including oil, gas, and electrical, currently run underneath the Metro ROW. The LPA would relocate these lines within the Metro ROW in several areas or protect them in place. Utilities are discussed further in Section 3.11, Utilities and Service Systems, of the Draft EIR.

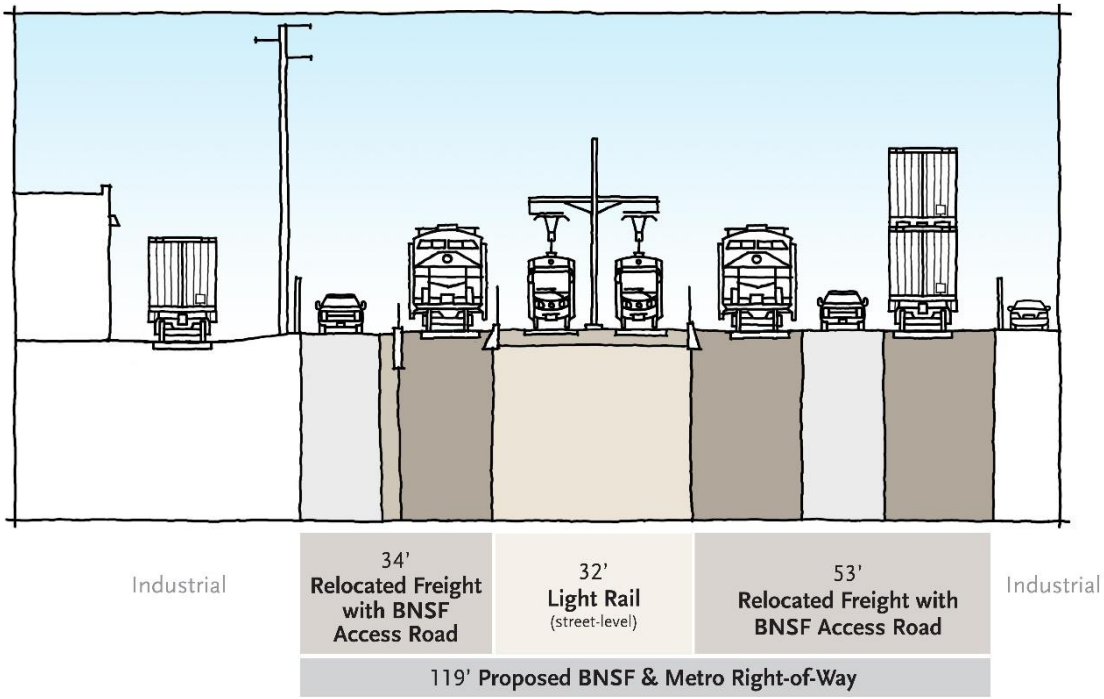
2.3-1.1 Freight Track Modifications

The width of the Metro ROW varies throughout the project area. This section discusses where the existing freight track would be shifted within the Metro ROW as part of the LPA to accommodate the light rail tracks.

Just south of the Redondo Beach (Marine) Station, the two existing freight tracks would be shifted slightly to the east within the existing Metro ROW. Two new maintenance-of-way tracks and an access road would be added to the east of the new siding tracks, within the Southern California Edison ROW where overhead power lines are located. The existing siding tracks near Inglewood Avenue would be removed to accommodate the new light rail tracks. The two mainline freight tracks would merge into a single track at Inglewood Avenue. At Manhattan Beach Boulevard, the freight track would cross the street at-grade below the elevated light rail structure and shift from the east side to the west side of the Metro ROW, running west of the light rail tracks. Between Manhattan Beach Boulevard and 170th Street, the existing freight track would be relocated to the west up to approximately 15 feet within the Metro ROW. In this segment, the freight trains would continue to cross streets at-grade as they do today. The at-grade freight crossings would be upgraded to be quiet zone ready, as discussed in the following pages. Between 173rd Street and Grant Avenue, the freight track would remain in its current general location, crossing both Artesia Boulevard and Grant Avenue on existing freight bridges. Between Grant Avenue and Hawthorne Boulevard, the freight track would be relocated to the west, shifting up to seven feet. Just north of Hawthorne Boulevard, the existing freight track would remain in its existing location to cross Hawthorne Boulevard and 190th Street on existing freight bridges as it does today.

South of 190th Street, the character of the Metro ROW changes from a single freight track to a denser network of freight tracks, storage tracks to stage cargo, and spur tracks serving adjacent properties along the Metro ROW. To accommodate the light rail, the existing freight tracks would be shifted on both sides (east and west) of the Metro ROW to allow the light rail tracks to travel in between freight tracks to cross under two bridges: Prairie Avenue and Del Amo Boulevard. In various areas throughout this segment, the BNSF ROW would be expanded on both sides of the existing corridor, to accommodate the freight tracks and new access roads. Figure 2.3-12 shows the light rail and freight track configuration in this area. To provide access for freight track maintenance, there would be crossover tracks between Prairie Avenue and Del Amo Boulevard. The light rail tracks in this section would be elevated on an aerial structure to cross over the freight tracks. There would be a structure at Prairie Avenue to accommodate the BNSF track to the west of the abutment. The Del Amo Boulevard bridge span would be demolished and reconstructed with a wider span to accommodate an additional BNSF track underneath and to allow BNSF to maintain access to adjacent properties.

Figure 2.3-12. Locally Preferred Alternative – Looking South between 190th Street and Prairie Avenue



Source: Cityworks Design, 2025
Dimensions are preliminary and subject to refinement in future phases of design.
Corresponds with Cross-Section S in Appendix B.

2.3-1.2 Multi-Use Recreational Paths

Where there is sufficient room within the Metro ROW, the LPA would provide multi-use recreational paths for walking, cycling, etc. On the east side of the light rail tracks between Manhattan Beach Boulevard and 159th Street and on the west side of the freight tracks parallel to Condon Avenue between 159th Street and 170th Street, a multi-use path would be provided. This path and its associated landscaped area would vary in width and be approximately 20 feet wide. It would allow residents and visitors to safely walk or cycle along the Metro ROW next to Condon Avenue, which does not currently have a sidewalk. A fence would be provided between this multi-use path and freight track for safety. An example cross-section of the alignment and the multi-use path is shown in Figure 2.3-3.

Between Grant Avenue and 182nd Street, a multi-use recreational path would be provided on the east side of the light rail tracks, as shown in Figure 2.3-15. This path would range between approximately 10 to 20 feet wide and provide access to the Redondo Beach TC Station, as well as enhance access within the neighborhood.

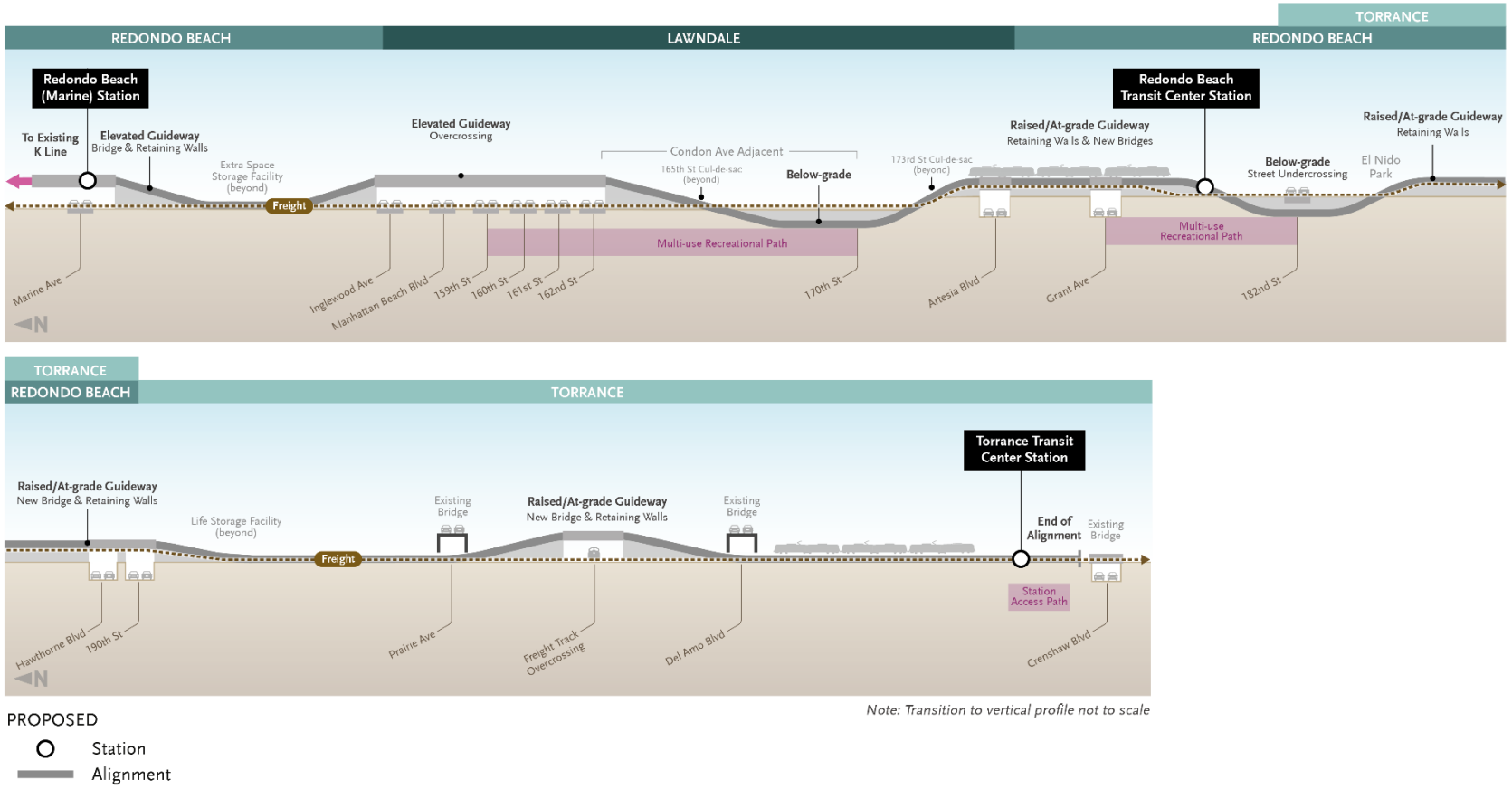
2.3-2 Roadway Modifications

Figure 2.3-13 shows the vertical profile of the LPA and all the roadways that the light rail would cross. The light rail tracks would be separated from all roadways. The freight tracks would remain at-grade throughout the length of the corridor where they are currently at-grade (see Figure 2.3-1). The roadway crossings are described below from north to south, and would include the following modifications:

> Inglewood Avenue: The roadway would cross under the elevated light rail structure, and the freight track would remain an at-grade crossing. New pedestrian gates and warning devices would be upgraded and installed on both sides of the freight track crossing. A new median and new vehicular safety gates would also be installed.

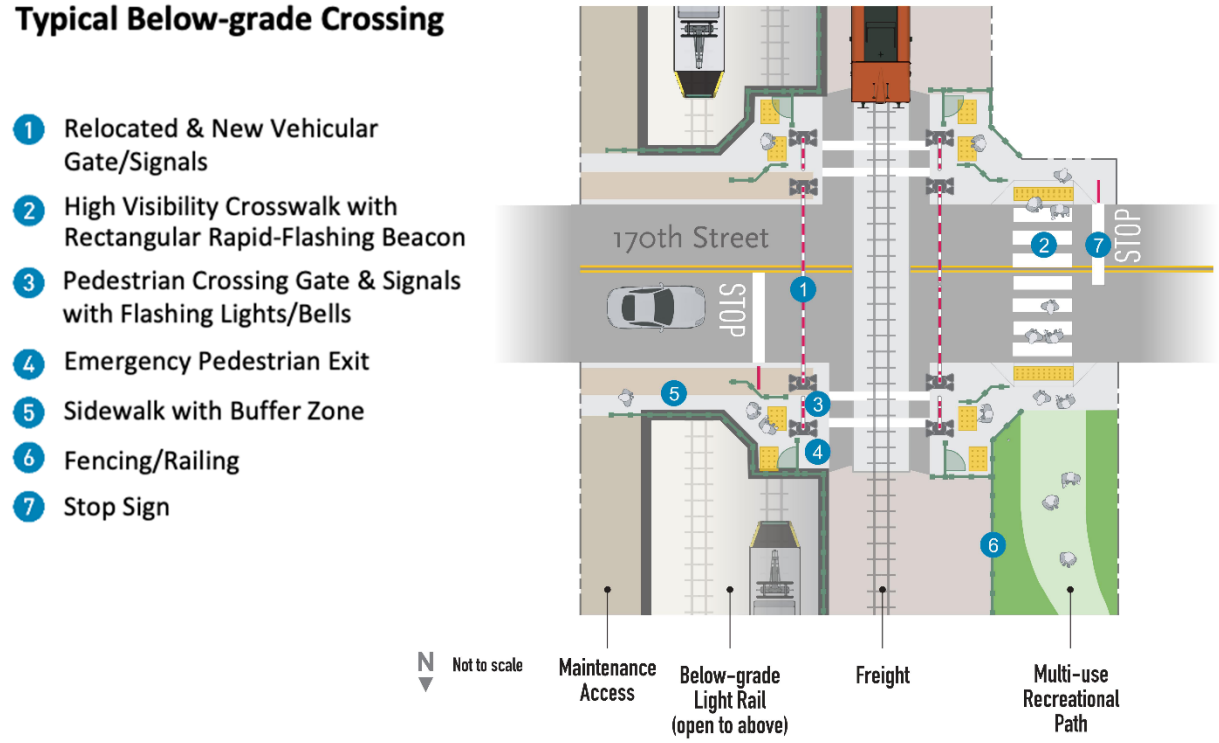
- Manhattan Beach Boulevard: The roadway would cross under the elevated light rail structure, and the freight track would remain an at-grade crossing. The pedestrian crossings would be reconfigured and include gates on both sides of the freight track crossing. The vehicular gates and signals would be relocated.
- 159th, 160th, 161st and 162nd Streets: These roadways would cross under the elevated light rail structure, and the freight track would remain as at-grade crossings. The multi-use recreational path would run at-grade parallel to the freight track, and at each roadway crossing, pedestrian gates and signals would be provided on both sides of the freight track, on both sides of each street. The multi-use path would cross each street with a signed and continental ("zebra") striped crosswalk. The vehicular gates and signals would be relocated.
- 170th Street: The roadway would be reconstructed as a bridge over the light rail trench, and the freight track would remain an at-grade crossing. The vehicular gates and signals would be relocated. Figure 2.3-14 shows the elements of a typical light rail trench crossing.
- Artesia Boulevard: Both the light rail and freight tracks would cross over the roadway on bridges. This would require minor modifications to the roadway to build new columns in the existing median to support the new light rail bridge.
- Grant Avenue: Both the light rail and freight track would cross over Grant Avenue on bridges. This would require minor modifications to the roadway to build new columns within the existing median to support the new light rail bridge. A new pedestrian crossing would be provided at Grant Avenue and Condon Avenue, to provide access to the multi-use path that connects to the Redondo Beach TC station and would include advanced pedestrian signals to warn approaching drivers.
- 182nd Street: The roadway would be reconstructed as a bridge over the light rail trench, and the freight track would remain an at-grade crossing. New pedestrian gates and warning devices would be upgraded and installed on both sides of the freight track crossing, including a continental ("zebra") striped crosswalk on the east side of the Metro ROW. New vehicular safety gates would also be installed.
- Hawthorne Boulevard and 190th Street: These roadways would cross under the new light rail and existing freight bridges. The light rail bridges would require new columns in the median of Hawthorne Boulevard and 190th Street.
- Prairie Avenue: The roadway would cross over the light rail and freight tracks on the existing roadway bridge. The south embankment would be cut back with a retaining wall to make room for the relocated freight track. A proposed box structure would be constructed south of the existing abutment to accommodate the relocated freight track and access road, but modifications to the roadway above the bridge structure are not required.
- Del Amo Boulevard: The bridge span would be reconstructed to make room for new light rail and freight tracks that travel below the roadway bridge.

Figure 2.3-13. Locally Preferred Alternative – Vertical Profile Diagram



Source: Cityworks Design, 2025

Figure 2.3-14. Typical Below Grade Crossing for Light Rail and At-Grade Freight Crossing 170th Street



Source: Cityworks Design, 2025
182nd Street has similar condition for light rail and freight crossing as 170th Street. However, the multi-use recreational path is on the east side of the rail corridor rather than the west side.

2.3-3 Quiet Zones

All at-grade roadway crossings would comply with California Public Utilities Commission (CPUC) regulations to ensure they are safely designed, constructed, and maintained. The existing at-grade freight crossings would be designed and upgraded to be "quiet zone ready", which would allow local jurisdictions to implement a quiet zone policy for the corridor in the future. A quiet zone would reduce noise along the corridor by allowing freight trains to eliminate the use of horns when approaching at-grade crossings, which would have safety gates and enhancements for trains, vehicles, and pedestrians. The quiet zone ready design includes site-specific safety infrastructure such as vehicle gates, pedestrian gates, signals such as lights and bells, and sidewalks and ramps that are all compliant with the Americans with Disabilities Act (ADA). Figure 2.3-14 shows the elements of a crossing where freight tracks are at-grade. Implementation of a quiet zone would result in the elimination of freight horns for approximately 1.7 miles, from north of Inglewood Avenue to south of 182nd Street.

2.3-4 Station Sites

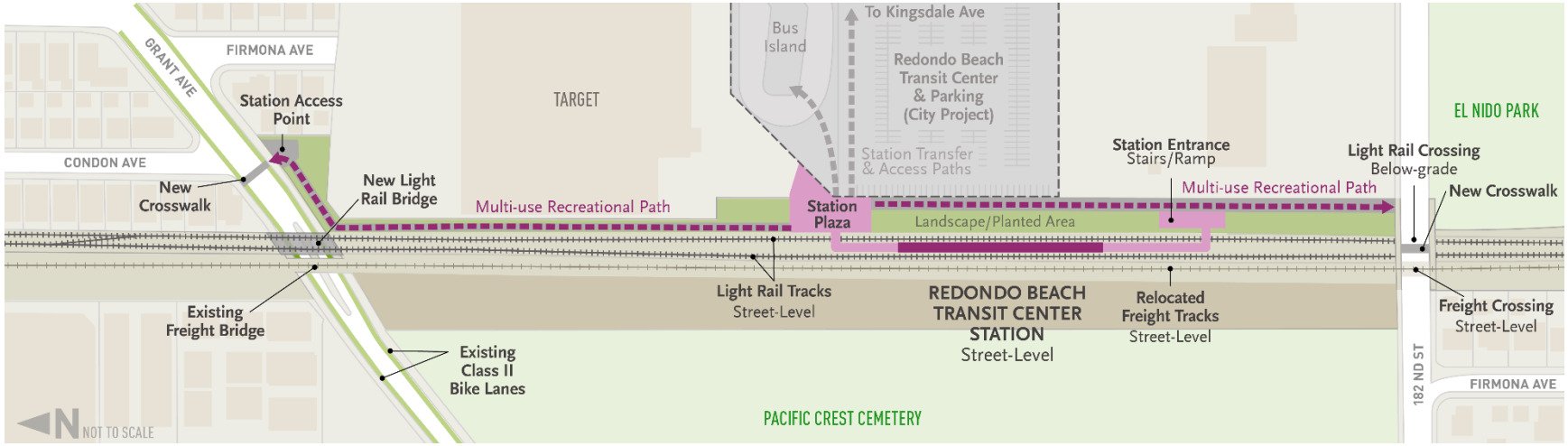
The LPA includes two new light rail stations. The stations would follow Metro's Systemwide Station Design Standards consistent with the Metro Board's Systemwide Station Design Policy. Pursuant to Metro Board Policy, stations shall be required to have a consistent canopy design, station entrance, signage, communications equipment, fare collection equipment, and safety and security systems. Metro's Systemwide Station Design Standards include elements of variability, such as landscaping and integrated site-specific artwork that connects the station within the broader community context. All the stations are proposed as a center-platform configuration, allowing passengers to access trains from

either direction from the same platform. The station platforms would be capable of accommodating three-car trains. The stations would allow level-boarding and full accessibility to comply with the ADA. Bicycle parking would be provided at all station sites.

Redondo Beach TC Station

The City of Redondo Beach's regional transit center, Redondo Beach TC, is located between Kingsdale Avenue and the Metro ROW, south of Grant Avenue and the existing Target store. The City's Redondo Beach TC is a regional hub for local and regional bus lines and includes vehicular and bike parking for transit riders. The LPA would include a one-level light rail station, with the platform located approximately 10 feet below the existing ground level (shown in Figure 2.3-15 and Figure 2.3-16). The lower station configuration allows the light rail to cross under 182nd Street. Light rail riders would arrive at the station platform, and connect to a station plaza via pedestrian pathways, ramps, and stairs to access the adjacent city's transit center. As described in Section 2.3-1, the LPA would also include a multi-use recreational path that would provide direct access to the light rail station from Grant Avenue and 182nd Street.

Figure 2.3-15. Locally Preferred Alternative – Redondo Beach TC Station Layout

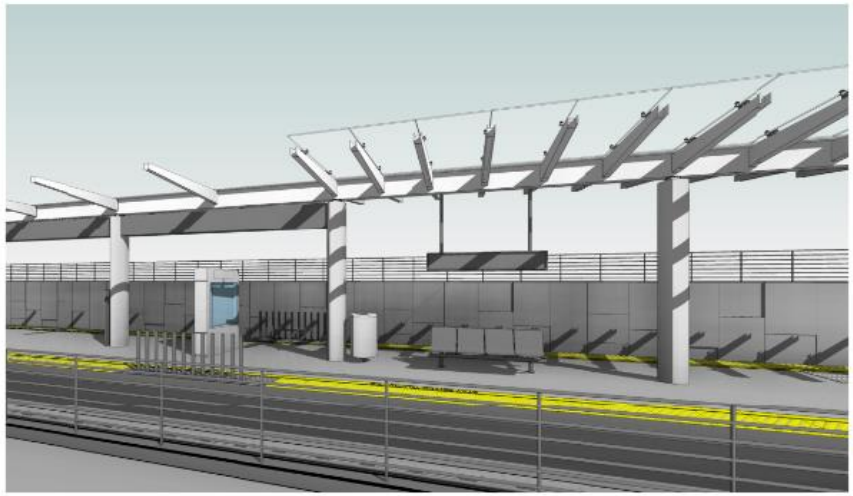


Source: Cityworks Design, 2025
Not to scale

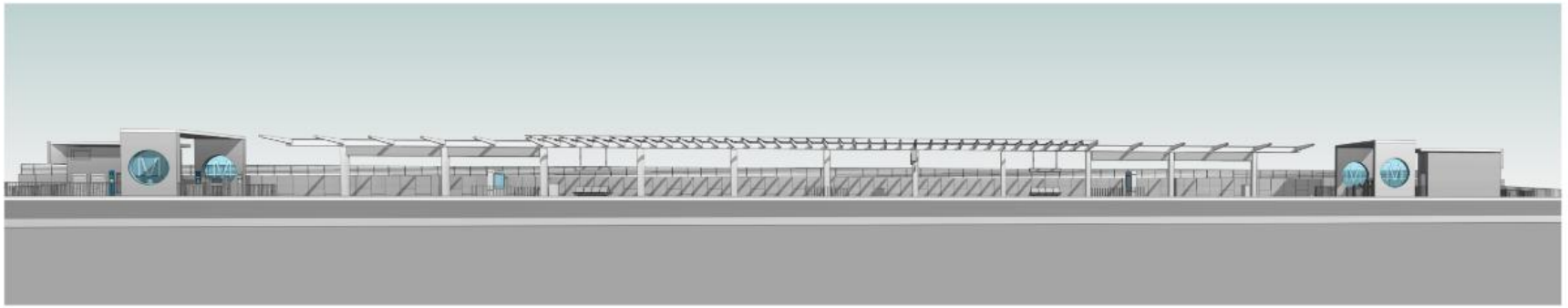
Figure 2.3-16. Locally Preferred Alternative – Renderings of At-Grade Station at Redondo Beach TC



W FACING - TICKETING AREA



NW FACING - PLATFORM AREA



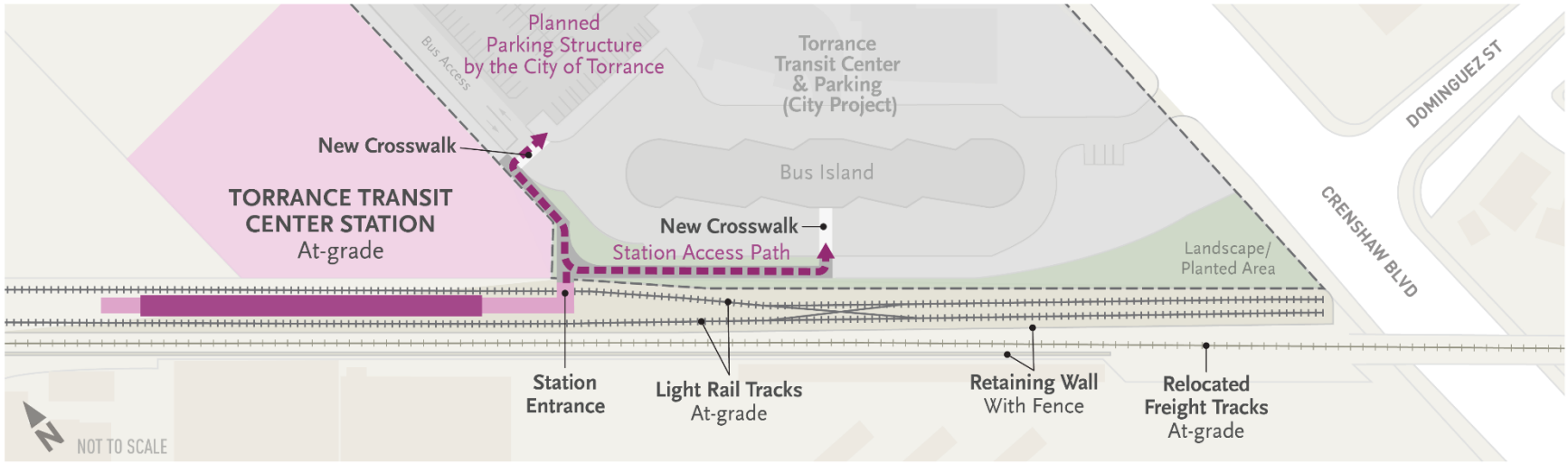
W FACING - OVERALL PLATFORM

Source: STV, 2022

Torrance TC Station

The City of Torrance's regional bus transit center is located west of Crenshaw Boulevard and east of the Metro ROW to the south of Del Amo Boulevard. The LPA would include an at-grade light rail station adjacent to the transit center, slightly north of the bus plaza (shown in Figure 2.3-17 and Figure 2.3-18). As part of the LPA terminus station, Metro would lease parking from the City of Torrance's transit center parking. The light rail station platform would be accessible by pedestrian pathways and crosswalks from the bus plaza and parking areas. This would be the southern terminus station for the LPA.

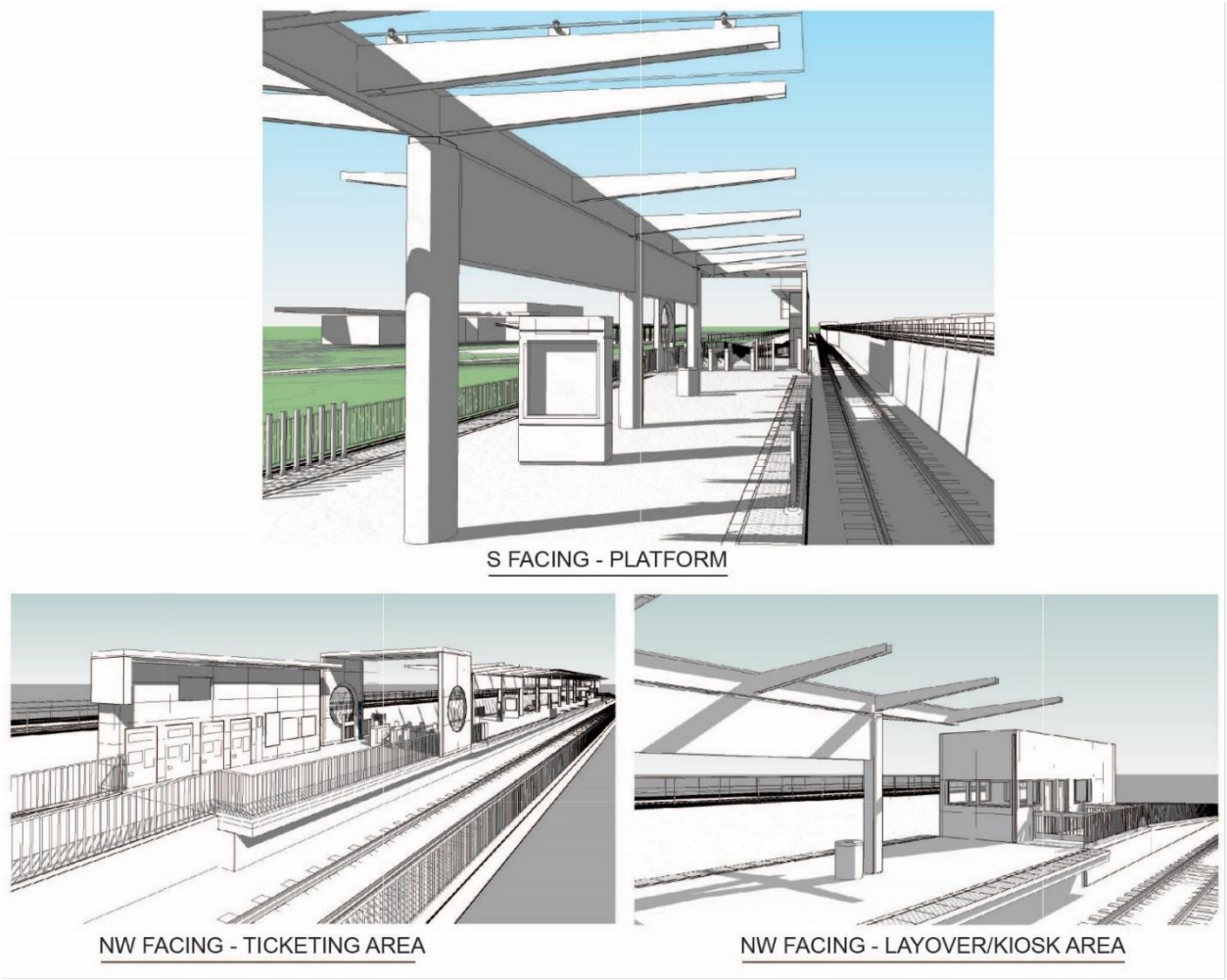
Figure 2.3-17. Locally Preferred Alternative – Torrance TC Station Layout



Source: Cityworks Design, 2025

Not to scale

Figure 2.3-18. Locally Preferred Alternative – Renderings of Torrance TC Station (Terminus)



Source: STV, 2022

2.4 System Components and Ancillary Facilities

The following section describes the required system components for the LPA. The light rail system components would adhere to the Metro Rail Design Criteria and would use a similar design as existing Metro light rail lines.

2.4-1 Light Rail Guideways

At-grade light rail guideways would run at or close to the grade of the existing ground, with some variation in heights to accommodate changes in topography. The distance between the at-grade light rail track centerlines would be a minimum of 14 feet. Figure 2.3-4 shows a typical cross-section of at-grade light rail tracks.

Elevated light rail guideways would be supported by structures including retained fill embankments, columns, or straddle bents. Retained fill guideways would be constructed where there is a transition between the at-grade and elevated guideway. They would be raised above the existing ground level on a platform made of reinforced walls.

The two under-crossings at 170th Street and 182nd Street would consist of the light rail tracks within an open trench, with depth varying based on site conditions and the location of underground utilities. Near

170th Street and 182nd Street, the trench would be up to 20 feet deep. The trench guideways would be approximately 30 feet wide to accommodate the two light rail tracks and associated infrastructure.

2.4-2 Light Rail Vehicles

It is assumed that existing Metro light rail vehicles would be used for this Project. For purposes of this analysis, the model P3010 light rail cars, manufactured by Kinkisharyo, are assumed. An example vehicle is shown in Figure 2.4-1. These vehicles are typically six-axle, double ended and articulated, and can be combined in trains up to three cars in length. The light rail vehicles would operate at speeds of up to 65 miles per hour and would carry approximately 70 seated passengers per car. The light rail vehicles are configured with a driver's cab at either end so that the train could run in either direction without the need to turn around. An additional five light rail vehicles would need to be added to Metro's fleet to operate the LPA.

Figure 2.4-1. Example Metro Light Rail Vehicle



Source: Kinkisharyo

2.4-3 Maintenance Facility

The LPA would not include a new or modified maintenance facility. The light rail vehicles would be serviced, maintained, and stored at the existing Division 16 Southwestern Yard in the City of Los Angeles or the El Segundo Yard Division 22 in the City of Hawthorne.

2.4-4 Ancillary and Support Facilities

Multiple additional elements are required to support light rail vehicle operations, including an overhead contact system (OCS), traction power substations (TPSS), and communications and signaling buildings. The light rail system components would adhere to the Metro Rail Design Criteria and would use a similar design as existing Metro light rail lines. At the Redondo Beach (Marine) Station, the project would tie into the existing systems infrastructure of the Metro C/K Lines.

2.4-4.1 Overhead Contact System

An OCS is a network of overhead wires that distributes electricity to light rail vehicles. The OCS poles for the LPA would be approximately 25 feet tall with a base of approximately 15 inches, generally located

between the two light rail tracks and spaced 90 to 170 feet apart. In some locations, the poles would be located on both sides of the tracks. Figure 2.4-2 shows an example of an OCS pole and wires.

Figure 2.4-2. Typical Overhead Contact System



Source: STV, 2022

2.4-4.2 Traction Power Substations

TPSSs supply the electricity for light rail operations by receiving high voltage power from utility companies and converting the alternating current power to direct current for distribution to the light rail vehicles. The TPSSs for the LPA would be enclosed structures spaced approximately one mile apart along the alignment and would require approximately 4,800 square feet of land. The siting and screening of TPSSs would follow principles of urban design. A representative example of a TPSS is shown in Figure 2.4-3. Six TPSSs would be needed for the LPA, with several options available for some locations. Access would be provided to each via maintenance roadways from the nearest public street and shielded with landscaping where possible. Table 2.4-1 lists the locations that have been identified as possible TPSS sites, which are also shown in Figure 2.4-4.

Figure 2.4-3. Typical TPSS Facility



Source: STV, 2012

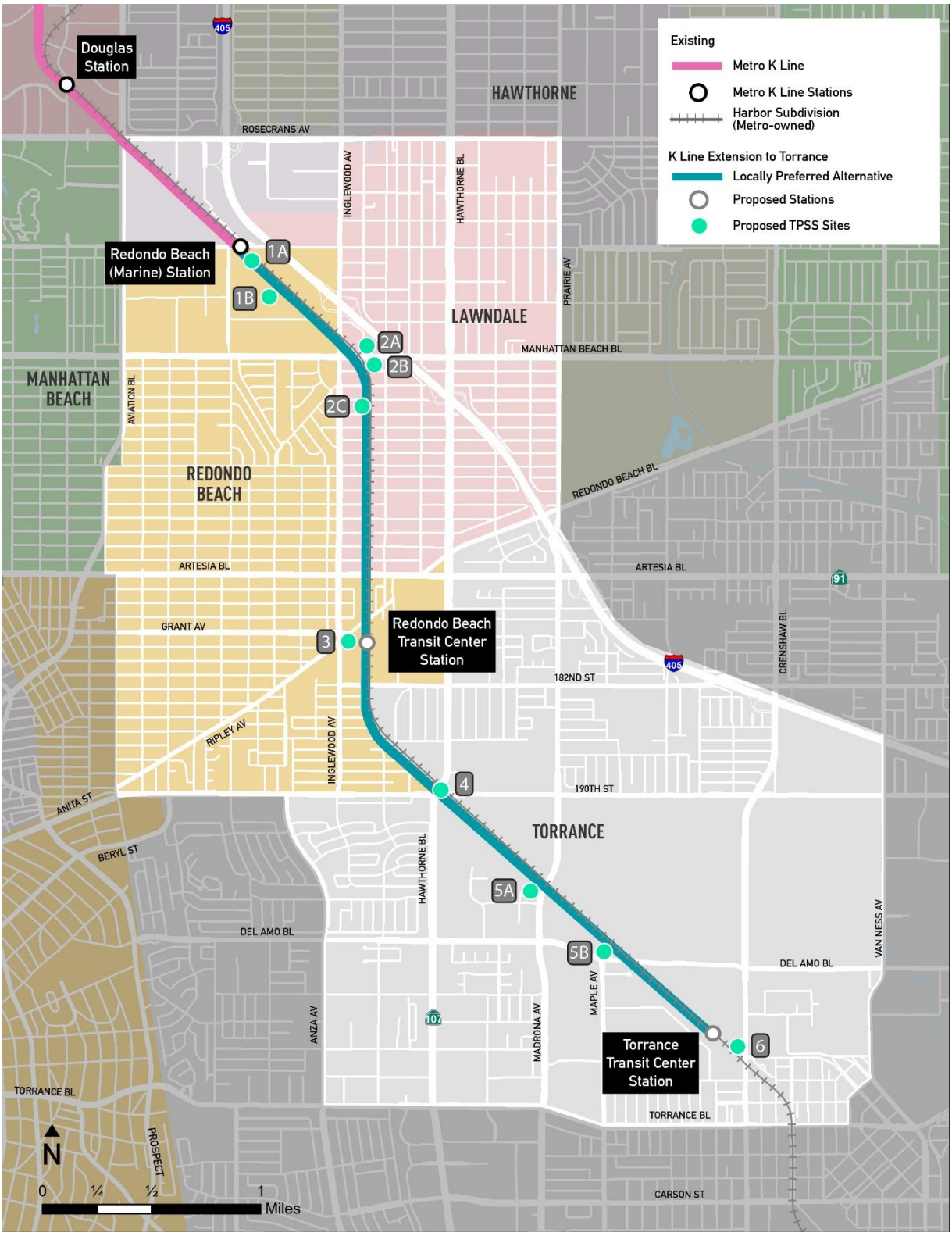
Table 2.4-1. TPSS Sites

TPSS ID[1]	Description
1A	South of the Redondo Beach (Marine) Station within Metro ROW
1B	South of the Redondo Beach (Marine) Station, north of Santa Fe Avenue, west of Metro ROW within private property
2A	North of Manhattan Beach Boulevard, west of Condon Avenue within private property
2B	Between Manhattan Beach Boulevard and 159th Street, west of the Metro ROW within private property
2C	North of 162nd Street, within Metro ROW
3	South of Grant Avenue, west of Metro ROW within private property
4	North of 190th Street, east of Hawthorne Boulevard, west of Metro ROW within private property
5A	North of Prairie Avenue, west of Metro ROW within private property
5B	North of Del Amo Boulevard, west of Metro ROW within private property
6	West of Crenshaw Boulevard, east of Metro ROW within private property

Source: STV, 2025

[1]TPSS ID number corresponds with Figure 2.4-4.

Figure 2.4-4. TPSS Locations



Source: STV, 2025
Not to scale

2.4-4.3 Communications and Signaling Buildings

Communications and signaling buildings contain train control and communications equipment. They would be located at each station of the LPA. These facilities are typically constructed as enclosures either underneath the station platforms or as small stand-alone structures along the guideway away from major pedestrian access; however, the project would not include such facilities underneath station platforms. The communications buildings would require approximately 500 square feet of area and signaling buildings would require approximately 100 square feet. Figure 2.4-5 shows an example of a train communications and signaling building.

Figure 2.4-5. Typical Train Communications and Signaling Building



Source: Metro, 2019

2.5 CONSTRUCTION SCENARIOS

Construction of the LPA would employ conventional construction techniques and equipment typically used (and permitted) in Southern California for highway, bridge, utility, transit, and railroad projects. The following section summarizes the construction assumptions and requirements for the LPA.

2.5-1 Construction Activities

Construction of the LPA is anticipated to last approximately six years, which is longer than the estimated timeframe in the Draft EIR for Elevated/At-Grade Alignment and shorter than the Trench Option. The construction schedule is longer than the Elevated/At-Grade Alignment due to the need to construct two under-crossings at 170th and 182nd Streets. However, it is shorter than the estimated timeframe required to construct the Trench Option, which would involve extensive excavation for a trench up to 30 feet deep (between Inglewood Avenue and 170th Street and near 182nd Street).

Construction would typically occur during daytime hours on weekdays. Some construction may be required to avoid congested freeways and surface streets, or due to the nature of certain construction processes, such as construction of freight track to avoid disruption to BNSF operations or construction of bridges over major arterials. Key construction elements required to construct the LPA are summarized below, generally in the order in which they would occur.

- **Clearing and Demolition of Existing Structures** – The ground would be cleared of vegetation in an early stage of the construction work. In some locations, the demolition of existing structures (or parts thereof) would be required to shift the freight track and/or to install the light rail tracks,

stations, and facilities. The debris generated from demolition would be recycled in part and disposed of in part.

- **Utility and Freight Infrastructure Relocations** – Construction would require some existing utilities to be protected in place or relocated. Utility relocation work would generally occur within the affected ROW and on adjacent and nearby streets. Affected utilities would include storm drains, sanitary sewers, power lines, gas pipelines, electrical duct banks, oil pipelines, electrical transmission lines, lighting, irrigation pipelines, water lines, fiber optic lines, telephone, and cable lines, among other things. Aboveground and underground utilities would be relocated or protected in place, if possible, to prevent damage or interruption of use of these facilities. Aboveground utilities, such as poles, would be relocated, or removed with the utility line relocated underground. Underground utilities would require soil excavation to varying depths, and disturbed ground would be backfilled with the same material or clean material. Construction activities for the relocated BNSF tracks would be coordinated with BNSF.
- **Embankment Work** – The embankment that would support the new or relocated tracks and stations would require the removal of vegetation and debris, shaping and compacting the soil, importing, or exporting soil as needed to achieve the required embankment and compacting the soil and importing crushed rock base material to support the track and structure foundations.
- **Freight Track At-Grade Street Crossings** – The existing freight track at the at-grade crossings would be relocated to accommodate the new light rail tracks. The subgrade would first be constructed and then the new track would be installed. Temporary street and lane closures would be coordinated to ensure no two adjacent streets would be closed concurrently.
- **Bridges and Elevated Structures** – Bridges and elevated structures would be constructed by first installing piles and then the columns and piers that support the superstructure. The horizontal support of the elevated guideway would then be constructed, typically using cast-in-place concrete temporarily supported by falsework. Where new light rail bridges are adjacent to existing freight track bridges, a portion of the abutment/retaining walls would be demolished before construction of the new structure.
- **Trenches** – Trenches could be constructed with different methods depending on the trench depth. Shallow guideway trenches (in the southern segment near 170th and 182nd Streets) would likely be constructed with secant piles or cast-in-drilled hole soldier piles and lagging and then excavating between them to construct a U-shaped reinforced concrete trench structure. Where necessary, ground replacement or improvement would be undertaken to strengthen the base of the trench, and any gaps between pile and trench walls would be backfilled with self-compacting material. The LPA's trenches would likely utilize drilled hole piles backfilled with concrete to form the trench walls, with alternating large and small secant piles. Existing soil would then be excavated to form the trench void and construction of the concrete base of the trench structure would follow. The deepest sections of the trench would have supporting concrete strut beams installed near the tops of the walls. The top of the pile walls would be capped by a cast-in-place longitudinal reinforced concrete beam. During excavation and construction of the trench, groundwater pumps would be used to remove excess water. All trench walls would be waterproofed and constructed with drainage systems behind the walls to adequately remove water and prevent the buildup of hydrostatic pressure. Long-term groundwater would be managed with either a gravity system or sump pumps located at the low points of the trench.
- **Retaining Walls** – Retaining walls would be constructed in different ways, depending on the location and wall type. Mechanically Stabilized Earth (MSE) walls are generally used in fill areas and would be

constructed by first building a "leveling pad" foundation, followed by placement of prefabricated concrete facing panels and steel geo-reinforcing straps as the wall is backfilled. When the walls have been built to the finished elevations, concrete caps would be placed over the top panels. Soldier pile or secant pile walls would be used in cut areas, and would be constructed by first drilling shafts, placing steel piles, and backfilling the holes. The area would be excavated from top-down, and then the cast-in-place concrete facing would be placed. Cast-in-place retaining walls may be used in some areas, which consist of first constructing the foundation, followed by cast-in-place concrete walls. All walls would be constructed with drainage systems behind the walls to adequately remove water and prevent the buildup of hydrostatic pressure.

- **Stations** – The construction approach varies according to the proposed station location and layout. The Redondo Beach TC Station would be constructed following a similar sequence as described for trenches and retaining walls, with the walls constructed first, followed by the foundation and track bed and then construction of platforms. Platforms would involve cast-in-place concrete or pre-cast panels. The at-grade Torrance TC Station would involve cast-in-place concrete or pre-cast panels to construct the station platform with ramps and stairs. For all station types, the station operational equipment and furnishings (e.g., vertical circulation elements, lighting, seating, signage, artwork, and fare vending equipment) would be added after the station platform is constructed.
- **Railroad/Light Rail Track** – Construction activities for at-grade light rail track would include preparation of the track bed and installation of the supporting base, followed by installation of the rails and ties. Rails would be flash-butt and thermite welded either on site or in a nearby staging yard. On-track regulators and tampers would be utilized to set and align the tracks, with grinders used to adjust the rail heads to match train wheel profiles. For elevated guideways, the light rail track would be installed via direct fixation (i.e., rail fastened directly to a bridge superstructure).
- **Systems Construction** – This would include the installation of wayside signals, crossing warning signals, conduits, control houses, the OCS, and TPSSs. The OCS construction would start with the foundations for the OCS poles, followed by duct banks and conduit for the electrical feeder lines from the TPSS, and then the OCS poles. TPSS construction would involve first grading the site and then installing the TPSS structure and connecting it to the utilities. Signal houses are typically prefabricated metal-clad buildings, which are placed upon a concrete foundation.
- **Property Acquisitions** – Construction would be primarily staged within the Metro ROW. The LPA would require acquisitions (full or partial) and easements (temporary or permanent) of nearby properties during construction and operation. Metro has designed the project to avoid displacement of residents. North of 190th Street, the LPA would have limited property acquisitions for non-residential properties to locate the TPSSs. South of 190th Street, the LPA would require partial property acquisitions of non-residential properties along the Metro ROW to build the light rail tracks and accommodate multiple relocated or new freight tracks, storage tracks, spurs, and access roads. For any properties that may have existing contamination, Metro would conduct a Phase II site investigation and implement remediation as needed. Additional details are provided in Section 3.9, Hazards and Hazardous Materials, of the Draft EIR and in Chapter 4, Corrections and Additions, of this Final EIR.

2.5-2 Construction Equipment

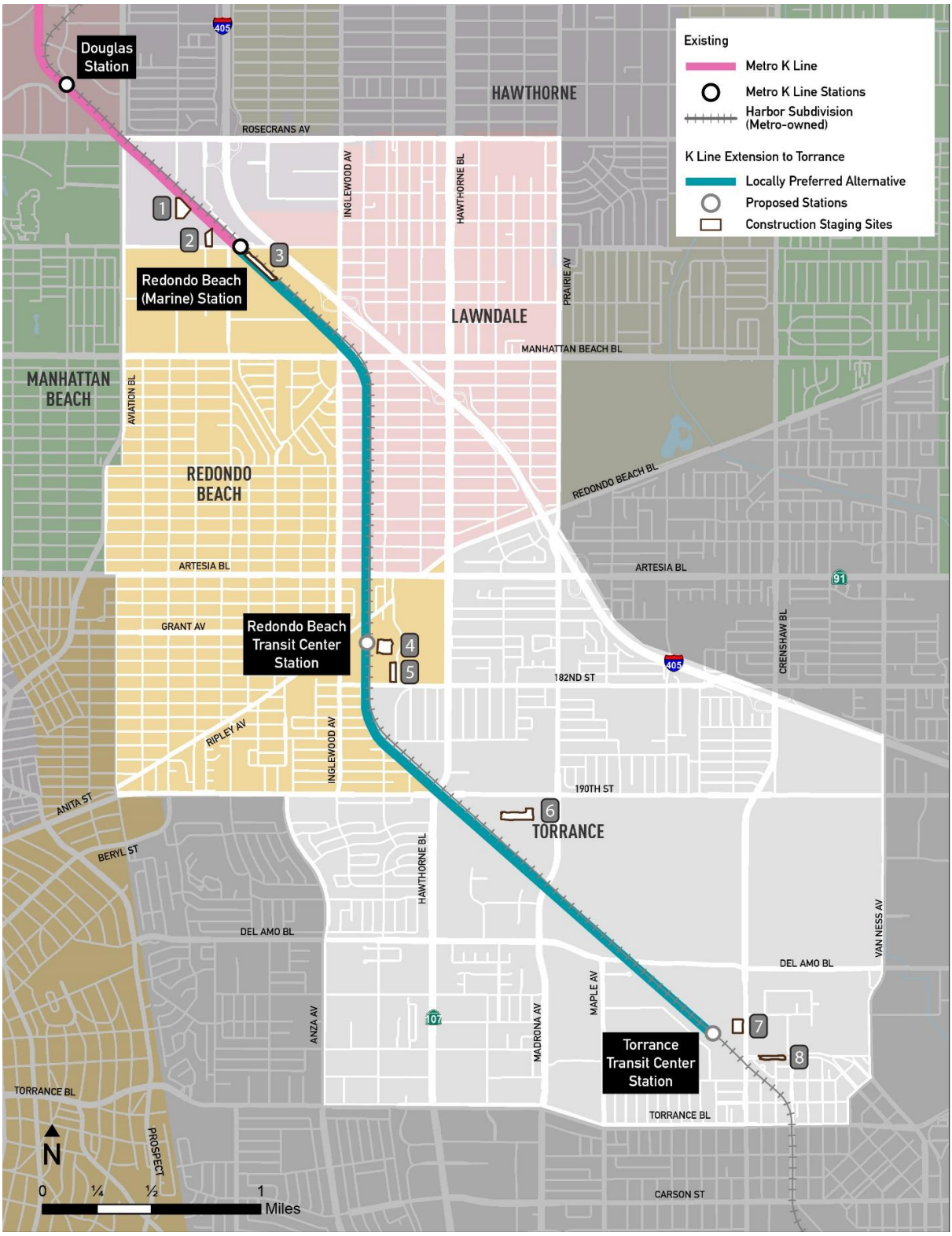
The construction equipment that would be used for the LPA is typical of that found engaged in contemporary highway, building, bridge and utility work plus some specialized railroad track and OCS construction equipment. All equipment would conform to current applicable safety and environmental

regulations. The general construction equipment (subject to final selection by the contractor) could include the following:

- Aerial Lifts
- Air Compressors
- Bore/Drill Rigs
- Cement and Mortar Mixers
- Concrete/Industrial Saws
- Cranes
- Crawler Tractors
- Crushing/Processing Equipment
- Dumpers/Tenders
- Excavators
- Forklifts & Rough Terrain Forklifts
- Generator Sets
- Graders
- Pavers & Paving Equipment
- Plate Compactors
- Pressure Washers
- Pumps
- Rollers
- Rubber Tired Dozers
- Rubber Tired & Skid Steer Loaders
- Signal Boards
- Surfacing Equipment
- Sweepers/Scrubbers
- Tractors/Loaders/Backhoes
- Trenchers
- Welders
- Support vehicles, including employee personal transportation, fuel delivery trucks, mechanics' trucks, and utility trucks used by supervisors and inspectors

The LPA would also include potential off-site locations for temporary use during construction for the laydown of tools, materials, equipment, and vehicles. A map of the potential locations is shown in Figure 2.5-1, and images of each site are included in Figure 2.5-2 and Figure 2.5-3.

Figure 2.5-1. Construction Staging Sites



Source: STV, 2025
Site numbers correspond with Figures 2.5-2 and 2.5-3.

Figure 2.5-2. Construction Staging Locations: Sites 1-5



Source: STV, 2025

Figure 2.5-3. Construction Staging Locations: Sites 6-8



SITE 6



SITE 7



SITE 8

Source: STV, 2024

2.5-3 Construction Durations

Table 2.5-1 shows the approximate construction schedules, as well as amount of soil that would be moved per construction activity for the LPA.

Table 2.5-1. LPA – Construction Durations

Phase Name	Total Duration	Activity Frequency (days/week)	Maximum Soil Import/ Export	Approx. Maximum Daily Truck Loads
Early Utility Relocation	18 months	5	13,600 CY	2
Project Start Up	6 months	5	49,800 CY	35
Utility Relocation	15 months	5	3,400 CY	2
Retaining Walls, Grading and Embankment for Freight Track Relocation	18 months	5	105,500 CY	54
Freight Railroad At-Grade Crossings	4 months	5	4,200 CY	4
Freight Trackwork (By BNSF)	25 months	5	71,100 CY	21
Stations and Access	18 months	5	15,100 CY	1
Retaining Walls, Grading and Embankment for Light Rail Guideway	8 months	5	110,000 CY	50
Light Rail Guideway Bridges	25 months	5	66,500 CY	6
Light Rail Guideway Trench	19 months	5	111,300 CY	50
Light Rail Trackwork	15 months	5	80,000 CY	21
Systems Construction	12 months	5	-	-
Contingency	15 months	-	-	-
Testing/Commissioning	9 months	5	-	-
Revenue Service	-	-	-	-

CY = cubic yard

Note: The LPA is anticipated to take approximately six years to construct, based on updated construction assumptions and parameters. Some of the construction durations listed above and their associated truck loads hauled may occur concurrently and should not be interpreted as sequential or cumulative.

2.6 PROJECT FEATURES

As a part of the LPA, several project features would be implemented during construction or included in the project design plans to ensure compliance with applicable laws, guidelines, and agency guidelines. These project features include design elements, best management practices, and other measures that are either required by law, permit conditions, or approvals from federal, state, regional or local agencies, or that reflect industry best practices in transit construction and operations. Unlike CEQA mitigation measures, which are adopted to reduce or avoid significant environmental impacts identified in the EIR, project features are incorporated into the project as standard components of its design and implementation.

The project features are listed below. They are described further in each respective section within Chapter 3 in the Draft EIR, as well as in Appendix 2-C, Project Features in the Draft EIR, and Chapter 4, Corrections and Additions, of this Final EIR.

> Transportation

- PF-T-1. Construction Traffic Management Plan

> Aesthetics

- PF-AES-1. Local Zoning Ordinances
- PF-AES-2. Metro Design Standards

> Air Quality

- PF-AQ-1. Metro Green Construction Policy Compliance
- PF-AQ-2. SCAQMD Rule 403 Compliance
- PF-AQ-3. Metro 2020 Moving Beyond Sustainability Strategic Plan Compliance
- PF-AQ-4. Metro Rail Design Guidelines

> Noise and Vibration (subject to future agency approval)

- PF-NV-1. Quiet Zone Equipment Installation

> Biological Resources

- PF-BIO-1. Metro Tree Policy

> Geology and Soils

- PF-GEO-1. Metro Geotechnical Design Standards

> Hazards and Hazardous Materials

- PF-HHM-1. Handling, Storage, and Transport of Hazardous Materials and Wastes
- PF-HHM-2. Demolition Plans
- PF-HHM-3. Property Acquisition Phase II Site Investigation
- PF-HHM-4. Soil, Soil Vapor, and Groundwater Management Plans
- PF-HHM-5. Disposal of Groundwater

> Hydrology and Water Quality

- PF-HWQ-1. SWPPP Implementation per Construction General Permit and MS4 Permit
- PF-HWQ-2. Groundwater Treatment and Discharge per RWQCB Waste Discharge Requirements for Construction Dewatering
- PF-HWQ-3. Trench Construction Groundwater Pressure Control
- PF-HWQ-4. Trench Construction Runoff Collection and Treatment
- PF-HWQ-5: Temporary Storm Drain Inflow Rerouting
- PF-HWQ-6. LID BMPs per Regional Requirements
- PF-HWQ-7. Trench Option Runoff Collection and Treatment
- PF-HWQ-8. City of Torrance Flood Zone Requirements

> Utilities and Service Systems

- PF-US-1. Utility identification and Coordination
- PF-US-2. Service Interruption Notification

> Public Services

- PF-PS-1: Coordination with Torrance Refining Company and Emergency Responders

2.7 PERMITS AND APPROVALS

This EIR may be used in connection with permits and other discretionary approvals necessary for construction implementation of the LPA. Construction and implementation of the LPA would require permits and approvals from responsible agencies such as the City of Lawndale, City of Redondo Beach, and the City of Torrance, and other departments and owners with jurisdiction over protected resources. The anticipated permits and approvals required for the LPA are listed in Table 2.7-1.

Table 2.7-1. Permits and Approvals

Agency/Jurisdiction		Permit/Approval Required
State	California Department of Transportation	Approvals for modifications to Caltrans lease agreement (Hawthorne Boulevard bridge)
	State Department of Toxic Substances Control	Hazardous materials cleanup
	State Water Resources Control Board	Construction General Permit and SWPPP
		NPDES Dewatering Permit
		LA County MS4 NPDES Package
	California Public Utilities Commission	Grade separations, crossings, state safety oversight
	California Department of Fish and Wildlife	Consultation on protected species
Regional	Metro Board	Certification of the Final EIR, adoption of CEQA Findings, a Statement of Overriding Considerations, and Mitigation Monitoring and Reporting Program, and approval of the Project
	Regional Water Quality Control Board	Construction General Permit and SWPPP
	Southern California Edison	Permits for utility relocation
	LA County Department of Public Works	Permits for utility relocation
	LA County Fire Department	Discretionary actions
	BNSF Railroad	Approval of track relocations
Local	City of Lawndale City of Redondo Beach City of Torrance	Permits (traffic, street use, lighting, landscape, building demolition)[1]
	Redondo Beach Fire Department Torrance Fire Department	Discretionary actions

[1] Necessary permits from the cities of Lawndale, Redondo Beach, and Torrance include only those related to work within the cities' rights-of-way. The project would not require local permits for activities within the Metro ROW.

3 DESIGN REFINEMENTS

The Draft EIR analyzed a Proposed Project with two design options in the north–the Trench Option and the Hawthorne Option–and evaluated three CEQA alternatives: the No Project Alternative, the High Frequency Bus Alternative, and the 170th/182nd Grade-Separated Light Rail Transit Alternative. At its May 23, 2024 regular public meeting, the Metro Board of Directors chose the Hybrid Alternative, referred to in the Draft EIR as the "170th/182nd Grade-Separated Light Rail Transit Alternative," as the Locally Preferred Alternative (LPA). The LPA combines elements of the Elevated/At-Grade Alignment (referred to as the "Proposed Project" in the Draft EIR) and the Trench Option. Specifically, the LPA includes two grade separations at 170th Street and 182nd Street, which were studied as part of the Trench Option. This chapter identifies additional design refinements made following circulation of the Draft EIR.

3.1 DESIGN REFINEMENTS SINCE DRAFT EIR PUBLICATION

Table 3.1-1 summarizes the project design refinements made after circulation of the Draft EIR. These refinements apply to all alignments studied in the Draft EIR, including the LPA, unless otherwise noted, and are shown in Figure 3.1-1. Environmental analysis of these refinements is provided in this chapter.

The design refinements include minor adjustments to the alignments, support structure design, construction staging areas, and optional locations for light rail support facilities. These refinements were made to enhance compliance with design or environmental requirements, respond to comments received on the Draft EIR, and incorporate additional stakeholder coordination, analysis, and fieldwork.

Table 3.1-1. Design Refinements since the Draft EIR Publication

ID[1]	Location	City/ Jurisdiction	Reason for Refinement	Description of Refinement	Reference
1	Private Property: South of the Redondo Beach (Marine) Station, north of Santa Fe Avenue, west of Metro ROW	Redondo Beach	Based on further analysis of power needs and site access, an additional optional location for a Traction Power Substation (TPSS) was identified at the north end of the project. The new option would provide greater flexibility for maintenance operations and address potential challenges related to crane access at TPSS No. 1A.	The new TPSS option would be located on a parcel identified in the Draft EIR for permanent easement. The larger footprint required for the TPSS at this location could necessitate a larger partial acquisition or, if needed to accommodate all the elements of the project that impact the parcel, full acquisition of the property.	Appendix B, Select Advanced Conceptual Engineering Drawings - Locally Preferred Alternative, Page RW-302
2	Public Property: Manhattan Beach Boulevard crossing[2]	Lawndale	In response to comments from the Metropolitan Water District (MWD) on the Draft EIR regarding a potential utility conflict with a cast-in-drilled-hole (CIDH) pile proposed in the center of Manhattan Beach Boulevard—specifically, its location above a MWD water pipeline—an alternate support location for the elevated light rail structure is proposed at this location.	The refined design for the elevated light rail structure would eliminate the CIDH pile within Manhattan Beach Boulevard and shift the proposed straddle bents—located within the Metro ROW—to the north and south of the boulevard. This change would avoid any potential conflict with the underground MWD pipeline, allowing it to remain in place during both project construction and operation.	Appendix B, Select Advanced Conceptual Engineering Drawings - Locally Preferred Alternative, Page TC-302 and RW-304
3	Private Properties: Between 190th Street and south of Del Amo Boulevard	Torrance	Based on coordination with BNSF regarding the proposed freight track realignment, the design was refined to include a maintenance access path to serve the relocated freight tracks.	South of 190th Street, the railroad corridor would be widened by approximately five feet beyond what was included in the Draft EIR, to the southwest of the Metro ROW, to accommodate a maintenance access path for the freight tracks. This refinement would increase the area of partial acquisitions from industrial properties.	Appendix B, Select Advanced Conceptual Engineering Drawings - Locally Preferred Alternative, Page RW-313 through RW-318, T-314 through T-318

ID[1]	Location	City/ Jurisdiction	Reason for Refinement	Description of Refinement	Reference
4	Private Properties: North of Prairie Avenue, west of Metro ROW	Torrance	More detailed modeling of power demand for light rail operations indicated that minimum traction power voltage requirements may not be met with TPSS No. 5A, located near the Prairie Avenue overcrossing. To ensure adequate system performance, the design was refined to identify an alternate site (TPSS No. 5B) farther south, adjacent to the Del Amo Boulevard bridge.	TPSS No. 5B would be located to the north side of the Del Amo Boulevard bridge, on a parcel previously identified for acquisition as part of the project.	Appendix B, Select Advanced Conceptual Engineering Drawings - Locally Preferred Alternative, Page RW-318
5	Private Properties: Parcels (APN: 7352-015-005, 7352-015-006, and 7352-015-004) between Prairie Avenue and Del Amo Boulevard	Torrance	In response to comments from both Torrance Refining Company (TORC) and Torrance Logistics Company (TLC), the project design was refined to minimize the partial acquisition of the TORC property. This refinement addresses safety, security, and property concerns related to the TORC facility operations and compliance with applicable regulations.	Between north of Prairie Avenue and Del Amo Boulevard, the project footprint (including freight, light rail, and access roads) has shifted westward to avoid the TORC parcel. As a result, a larger partial acquisition would be required from the adjacent vacant parcel west of the rail corridor. This shift would also require additional modifications to the existing Prairie Avenue and Del Amo Boulevard bridges. At Prairie Avenue, a new box tunnel would be constructed to allow a realigned freight track and access road to pass beneath the roadway. At Del Amo Boulevard, the area beneath the bridge would be widened on the west to accommodate light rail and realigned freight and to provide sufficient clearance.	Appendix B, Select Advanced Conceptual Engineering Drawings - Locally Preferred Alternative, Page RW-315 through RW-318
6	City Property: City of Torrance Transit Center (APN: 7352-002-912)	Torrance	In response to comments from the City of Torrance, an alternative construction staging location has been identified, which would avoid potential conflicts with the City of Torrance's proposed parking garage.	An alternate construction staging site has been identified on a parcel (APN: 7352-002-911) adjacent to the Torrance Transit Center on Crenshaw Boulevard. This adjustment would allow construction staging to proceed without interfering with the City of Torrance's planned parking garage development.	Chapter 2, Description of the Locally Preferred Alternative, Page 2-36

ID[1]	Location	City/ Jurisdiction	Reason for Refinement	Description of Refinement	Reference
7	City Property: Torrance Transit Center Station Path	Torrance	In response to comments from the City of Torrance, the design was refined to address pedestrian safety and security concerns related to a segment of the proposed path connecting Crenshaw Boulevard to the Torrance Transit Center Station area. Specifically, the City raised concerns that the path could encourage pedestrians to cross Crenshaw Boulevard outside of signalized intersections.	The proposed path would provide pedestrian access from the light rail platform to the proposed bus plaza within the Torrance Transit Center. The segment of the proposed path that would have extended from the bus plaza to Crenshaw Boulevard has been removed from the design.	Appendix B, Select Advanced Conceptual Engineering Drawings - Locally Preferred Alternative, Page T-321

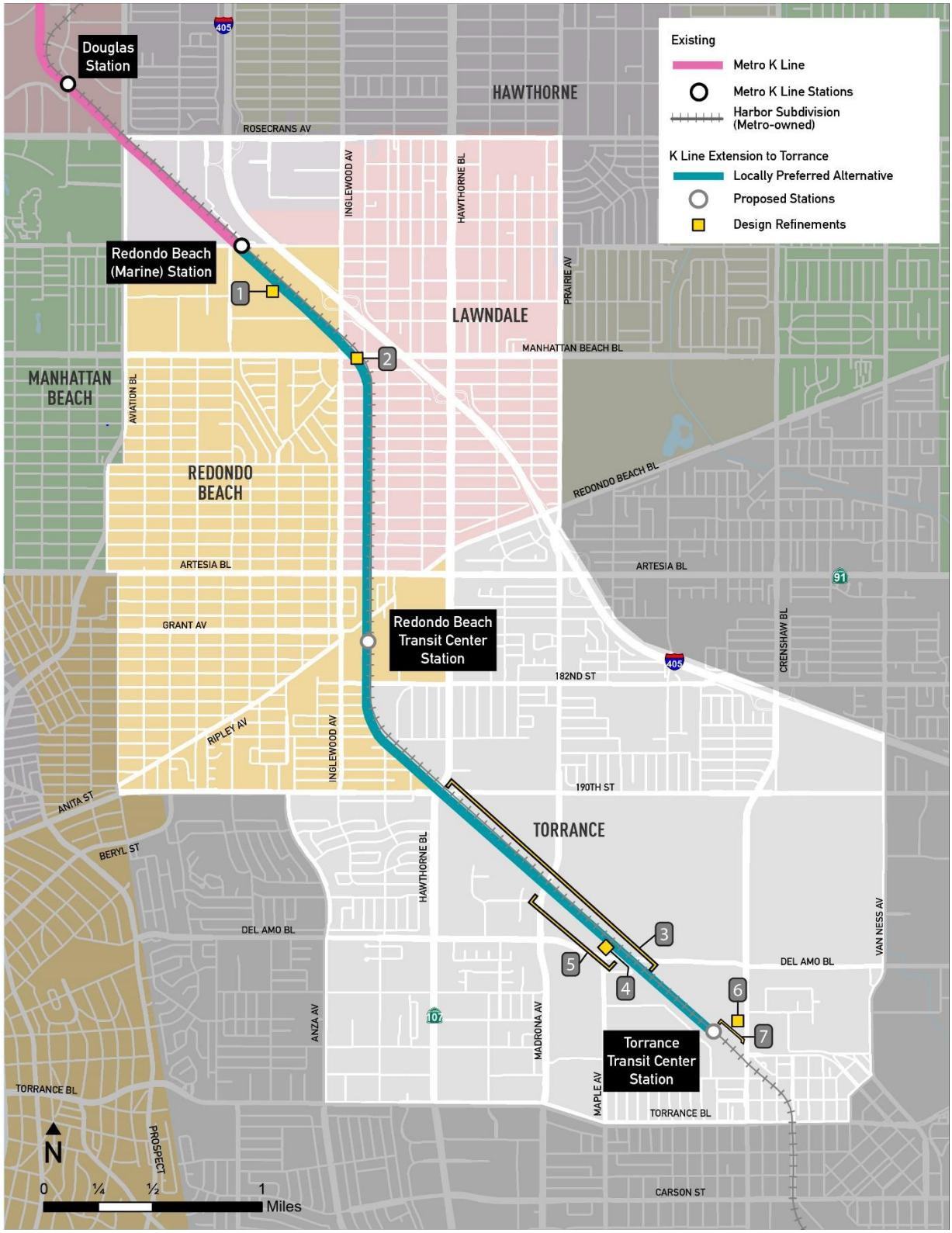
Source: STV, 2025

[1]ID number corresponds with Figure 3.1-1.

[2]This refinement only applies to the Elevated/At-Grade Alignment and LPA.

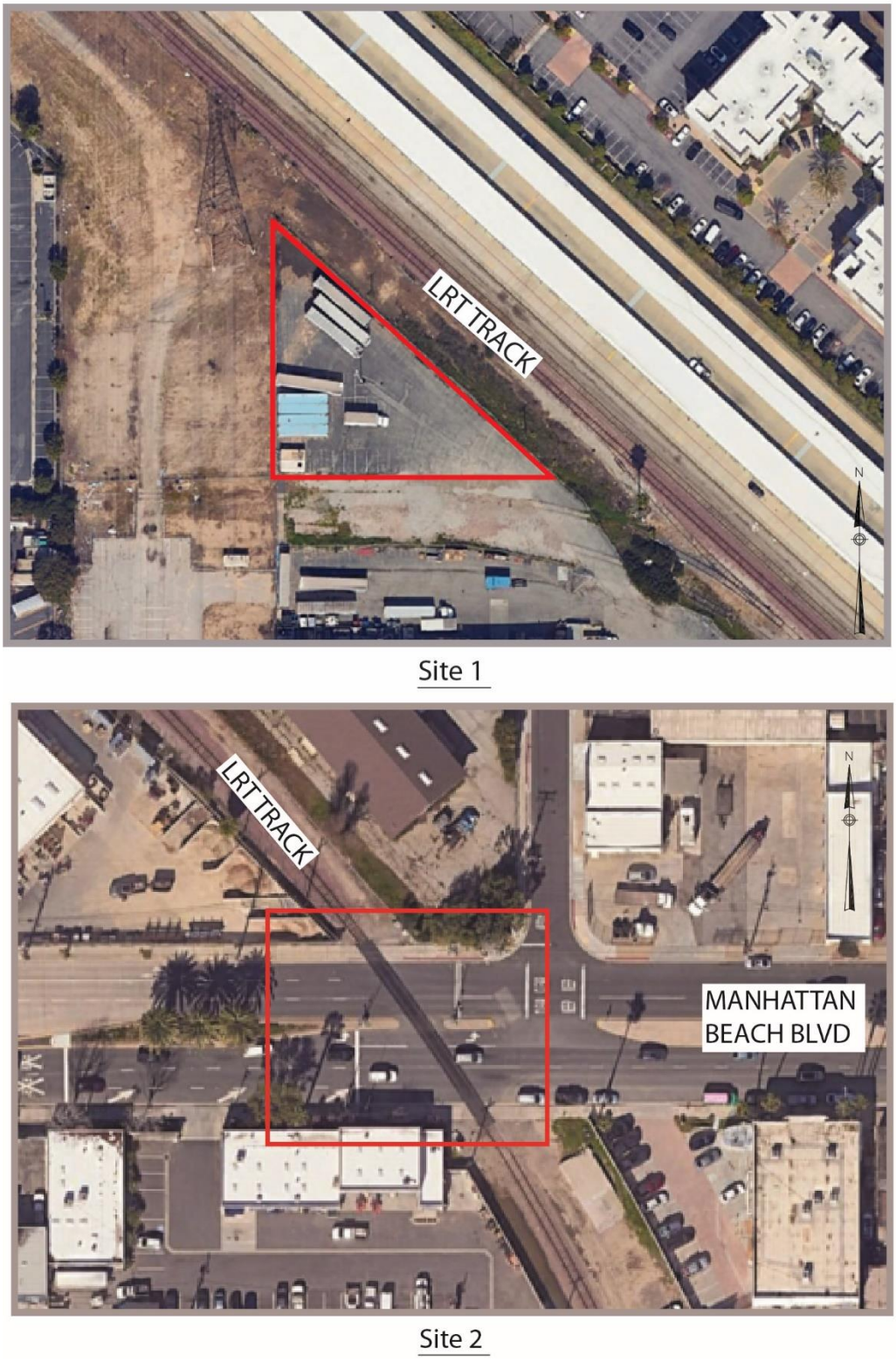
APN = Assessor's Parcel Number; BNSF= BNSF Railway; CIDH= cast-in-drilled-hole; MWD = Metropolitan Water District; ROW = right-of-way; TLC = Torrance Logistics Company; TORC = Torrance Refining Company; TPSS = Traction power substation

Figure 3.1-1. Design Refinements since the Draft EIR Publication



Source: STV, 2025
Not to Scale

Figure 3.1-2. Design Refinements since the Draft EIR Publication Locations: Sites 1-2



Source: STV, 2025

Figure 3.1-3. Design Refinements since the Draft EIR Publication Locations: Sites 3-5



Sites 3-5

Source: STV, 2025

Figure 3.1-4. Design Refinements since the Draft EIR Publication Locations: Sites 6-7



Site 6



Site 7

Source: STV, 2025

3.2 Requirements for Recirculation of an EIR Prior to Certification

According to the California Code of Regulations, Title 14 (CEQA Guidelines), Section 15088.5, "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" and that "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."

Per the California Code of Regulations, examples of significant new information include:

- A new significant environmental impact would result from the project or from a new mitigation measure proposed to be implemented.
- 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.
- 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.
- 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 & Game Com.* (1989) 214 Cal.App.3d 1043).

Information that "merely clarifies or amplifies or makes insignificant modifications in an adequate EIR" is not considered to be "significant new information" within the meaning of CEQA (14 California Code Regulations, Section 15088.5[b]).

3.3 No Significant New Information as a Result of the Locally Preferred Alternative

The refinements described in Section 3.1 do not result in impacts undisclosed in the Draft EIR, nor do they change the intensity of the impacts disclosed in the Draft EIR. Mitigation measures and project features described in the Draft EIR are applicable to the refinements. Additionally, the LPA selected by the Metro Board lessens significant environmental impacts of the alignments described in Chapter 2 of the Draft EIR. Section 3.4 of this Final EIR analyzes potential impacts of the design refinements in detail.

3.4 Environmental Impact Analysis of the Design Refinements

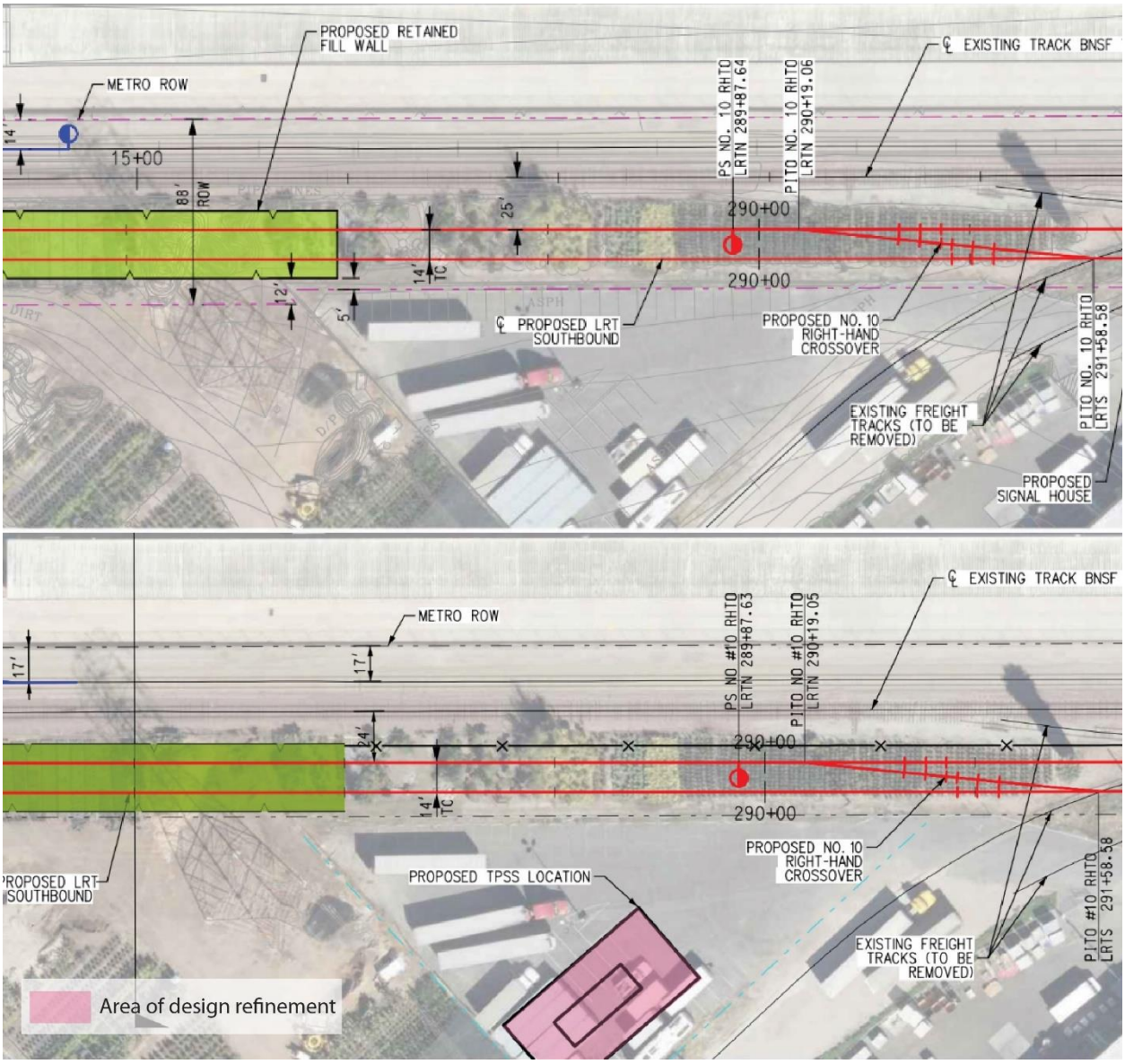
The evaluation of the potential impacts of the design refinements uses the same methodology and thresholds of significance as those described in the Draft EIR. This analysis focuses on areas where the refinements could result in new or substantially more severe impacts compared to those identified in the Draft EIR.

3.4-1 TPSS Sites

The Draft EIR stated that the project would require between four and six TPSSs. As described in Chapter 2, Project Description of the Locally Preferred Alternative, of this Final EIR, the LPA would require six TPSSs. Therefore, the total number of TPSS sites required for the project remains the same as stated in the Draft EIR, but two additional location options were identified as part of design refinements. Specifically, an alternate site for TPSS No. 1 (1B) was identified southwest of the existing Metro Redondo Beach (Marine) Station, adjacent to the Metro ROW north of Santa Fe Avenue, and an alternate site for TPSS No. 5 (5B) was identified adjacent to the Metro ROW immediately north of Del Amo Boulevard.

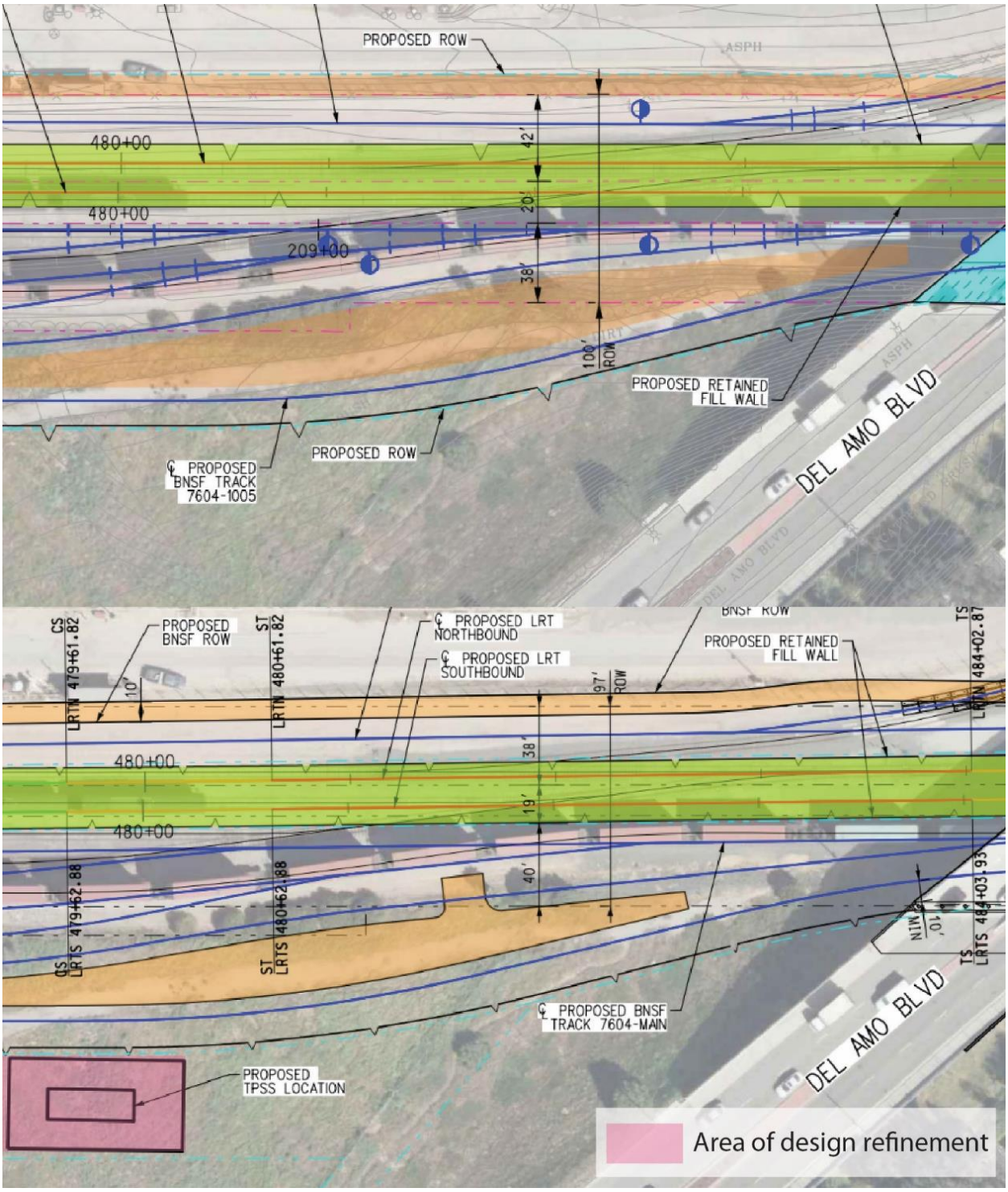
Figure 3.4-1 illustrates how the proposed TPSS design refinement sites correspond to the project component locations previously presented in Appendix 2-A, Select Advanced Conceptual Engineering Drawings, of the Draft EIR. These sites, as previously presented, included areas proposed for either new track and buildings or the expansion of existing structures. Although the installation and operation of a TPSS would introduce a new use within these sites, the uses would be of similar scale and intensity to the project components previously proposed in the Draft EIR.

Figure 3.4-1. Area of TPSS Site 1B in the Draft EIR ACE (Top) and Final EIR ACE (Bottom)



Source: STV, 2023; 2025

Figure 3.4-2. Area of TPSS Site 5B in the Draft EIR ACE (Top) and Final EIR ACE (Bottom)



Source: STV, 2023; 2025

The following discussions explain how potential impacts associated with the currently proposed locations for TPSS Nos. 1B and 5B are consistent with the analyses and conclusions of the Draft EIR.

3.4-1.1 Transportation

As described in the Draft EIR, the project would result in a significant impact if it would:

a. Conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities.

b. Conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b) [increase in VMT].

c. Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment).

d. Result in inadequate emergency access.

The TPSS No. 1B site and the relocated TPSS No. 5B site are located in industrial areas and would not require permanent changes to the local circulation system during construction or operation. Because the total number of TPSSs remains the same and all would be located adjacent to the alignment, no change in VMT is anticipated. Both TPSS sites are similar in scale to surrounding development and, as previously mentioned, would not require permanent alteration to the roadway network, including local pedestrian access, nor would they create visibility obstructions. Therefore, installation of a TPSS at either site would not result in hazards related to incompatible design or use. Because neither TPSS would alter the grade-separated nature of the light rail or the existing roadway network, there would be no effect on emergency access.

Therefore, transportation impacts related to the TPSS design refinements remain consistent with Section 3.1, Transportation, of the Draft EIR and Section 4.5 of Chapter 4, Corrections and Additions, of this Final EIR.

3.4-1.2 Land Use and Planning

As described in the Draft EIR, the project would result in a significant impact if it would:

a. Physically divide an established community.

b. Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect.

The TPSS No. 1B site and the relocated TPSS No. 5B site would remain within industrial areas, away from sensitive residential and commercial uses. Both sites are located within or adjacent to the existing Metro ROW, thereby avoiding impacts to established communities. The applicable plans, policies, and regulations identified in the Draft EIR are the same as those that would apply to the locations of these TPSS sites. Because the TPSSs would not alter the existing land use setting or conflict with applicable plans and policies during operation, the impact conclusions for land use and planning remain consistent with Section 3.2, Land Use and Planning, of the Draft EIR and Section 4.6 of Chapter 4, Corrections and Additions, of this Final EIR.

3.4-1.3 Visual and Aesthetics

As described in the Draft EIR, the project would result in a significant impact if it would:

a. Have a substantial adverse effect on a scenic vista.

b. Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway.

c. In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?

d. Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area, or create new shade or shadows that would substantially affect outdoor recreation facilities or other public areas.

The TPSS No. 1B site and relocated TPSS No. 5B site are located immediately adjacent to the Metro ROW. As established in the Draft EIR, there are no scenic vistas or state scenic highways within the resource study area.

While the timing and nature of construction at the TPSS sites would differ from that described in the Draft EIR, TPSS No. 1B would be located in an industrial area that also includes construction of the elevated light rail guideway. TPSS No. 5B would also be in an industrial area, which would include construction of light rail track, relocation of freight track, and roadway bridge construction. Thus, the visual conditions during construction at both sites would be similar in character to those described in the Draft EIR. Operationally, both TPSS sites would be similar in scale to surrounding industrial development and would not conflict with applicable zoning or other regulations governing scenic quality. Neither site is located near outdoor recreation facilities or other public areas that could be affected by new sources of light or glare, nor would TPSS operations generate an atypical amount of light or glare relative to surrounding conditions. Therefore, the impact conclusions for visual and aesthetics remain consistent with Section 3.3, Visual and Aesthetics, of the Draft EIR and Section 4.7 of Chapter 4, Corrections and Additions, of this Final EIR.

3.4-1.4 Air Quality

As described in the Draft EIR, the project would result in a significant impact if it would:

a. Conflict with or obstruct implementation of the applicable air quality plan.

b. Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is nonattainment under an applicable federal or state ambient air quality standard.

c. Expose sensitive receptors to substantial pollutant concentrations.

d. Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people.

As previously described, while the project design refinements include new site options for TPSSs (Nos. 1B and 5B), the same number of TPSS sites would ultimately be constructed and operated in similarly industrial areas as evaluated in Sections 3.4-3 and 3.4-4 (Air Quality) of the Draft EIR. More specifically, the design refinements would result in consistent determinations for localized air quality impacts as disclosed in the Draft EIR because inclusion of an additional optional location for the TPSS would result in a small expansion of the project footprint, construction of a TPSS at the new location would not require an increase in maximum daily off-road equipment activity or on-road vehicle trips. Furthermore, the land uses surrounding these sites are comprised of predominately light industrial and commercial businesses. Development of these sites would not cause sources of emissions to be active in closer proximity to sensitive receptors.

The same amount of power would be required, and this refinement would not affect the Draft EIR's impact determinations regarding air quality plans, increases in criteria pollutants, exposure of sensitive receptors (as none are present in these locations), or other emissions.

Because of the number, type, and timing of emissions would not change, air quality impacts would remain consistent with those described in the Draft EIR. Therefore, the design refinements would not change the project's GHG emissions, and the impact conclusions remain consistent with those analyzed in the Draft EIR and Section 4.8 of Chapter 4, Corrections and Additions, of this Final EIR.

3.4-1.5 Greenhouse Gas Emissions

As described in the Draft EIR, the project would result in a significant impact if it would:

a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment.

b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases.

As previously noted, the same number of TPSS sites would be constructed as part of the project design refinements. As a result, the same amount of power would be required, and no additional greenhouse gas (GHG) emissions would be generated, either directly or indirectly, beyond those identified in the Draft EIR. Therefore, the design refinements would not change the project's GHG emissions, and the impact conclusions remain consistent with those analyzed in the Draft EIR.

3.4-1.6 Noise and Vibration

As described in the Draft EIR, the project would result in a significant impact if it would:

a. Generate a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established by the Federal Transit Administration (FTA), in the local general plan or noise ordinance, or applicable standards of other agencies.

b. Be located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, expose people residing or working in the project area to excessive noise levels.

c. Generate excessive ground-borne vibration.

As with the Draft EIR, ground-borne noise is not analyzed here, as it typically applies only to vibration sources that do not have an air-borne noise path (meaning the vibration source is underground, like a subway line).

Construction and operation of the proposed TPSS design refinement locations could affect ambient noise levels. The proposed TPSS design refinements would use the same construction methods as previously evaluated, occur adjacent to other project construction described in the Draft EIR, and require similar construction durations, as described in Section 3.6 and Section 4.5-3.6 of the Draft EIR. The proposed locations of TPSS Nos. 1B and 5B relative to nearby sensitive receptors are shown in Figure 4 5 and Figure 4-8 in Chapter 4, Corrections and Additions, of the Final EIR. Only one of the TPSS Nos. 1A or 1B would be constructed; TPSS No. 1A, analyzed in the Draft EIR, is near the same sensitive receptors as optional TPSS No. 1B. Therefore, construction and operational noise impacts of TPSS Nos. 1A and 1B would be similar. The currently proposed TPSS No. 5B is similarly distant from sensitive receptors as the previously analyzed TPSS No. 5A location. Mitigation measures identified in the Draft EIR remain applicable. For these reasons, neither TPSS No. 1B nor No. 5B would result in exceedances of FTA noise standards during operation, or substantially increase noise levels during construction beyond those identified in the Draft EIR. Additionally, these areas are not near sensitive receptors determined to be significantly noise-impacted during construction beyond what was identified in the Draft EIR.

Figure 4-11 and Figure 4-38 show the locations of vibration-sensitive receptors relative to the proposed TPSS sites. Neither figure identifies sensitive receptors near the design refinement locations. Therefore, vibration impacts during construction and operation would remain consistent with the analysis and conclusions in the Draft EIR.

3.4-1.7 Biological Resources

As described in the Draft EIR, the project would result in a significant impact if it would:

a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife (CDFW) or U.S. Fish and Wildlife Service (USFWS).

b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the CDFW or USFWS.

c) Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means.

d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites.

e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance.

f) Conflict with the provisions of an adopted Habitat Conservation Plan (HCP), Natural Community Conservation Plan (NCCP), or other approved local, regional, or state HCP.

The proposed TPSS design refinement locations would use the same construction methods as previously evaluated, occur adjacent to other project construction defined in the Draft EIR and require similar durations, as described in the Draft EIR Sections 3.7 and 4.5-3.7. Neither special-status species, riparian habitat, protected wetlands, nor migratory species occur at either TPSS site (Nos. 1B and 5B).

Nonetheless, Mitigation Measures MM-BIO-1, MM-BIO-2, MM-BIO-3, and MM-BIO-4 would still apply to ensure that any potential construction-related impacts are reduced to less than significant, consistent with the Draft EIR. These locations are also not subject to any relevant policies, ordinances, or adopted HCPs or NCCPs.

The same types of operational maintenance described in the Draft EIR would occur at these TPSS sites. As noted, Metro's routine TPSS maintenance typically does not disturb vegetation or trees that support nesting birds.

3.4-1.8 Geology and Soils

As described in the Draft EIR, the project would result in a significant impact if it would:

a. Expose people or structures to adverse effects, including the risk of loss, injury, or death involving:

   i. Rupture of known earthquake fault, as delineated on the most recent AP Earthquake Fault Zoning map issued by the State Geologist for the area or based on other substantial evidence of a known fault.

   ii. Strong seismic ground shaking.

iii. Seismic-related ground failure, including liquefaction.

iv. Landslides.

b. Result in substantial soil erosion or the loss of topsoil.

c. Be located on a geologic unit or soil that is unstable or that would become unstable as a result of the project and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse.

d. Be located on expansive soil as defined in Section 1803.5.3 of the California Building Code (CBC, 2019) creating substantial risks to life or property.

e. Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater.

f. Directly or indirectly destroy a unique paleontological resource or site or unique geological feature.

(a) Exposure of People or Structures to Adverse Effects

Both TPSS design refinement sites (Nos. 1B and 5B) are located outside of known fault traces and outside California Geological Survey (CGS) mapped Alquist-Priolo (AP) Earthquake Fault Zones. Therefore, construction and operation of these TPSS sites would result in no impact related to fault rupture.

As the same number of TPSS sites analyzed in the Draft EIR would ultimately be constructed, TPSS Nos. 1B and 5B would not require different construction equipment or result in substantial changes to the number of workers compared to what was previously anticipated. Additionally, the TPSS refinement sites would be located adjacent to the Metro ROW, on parcels previously expected to be affected by the project. The same design approach to accommodate the high seismic ground motion and associated effects (such as liquefaction-induced vertical settlements or lateral spreading), if any, would apply to these sites. Because no new construction methods would be required, the TPSS sites would continue to conform to the Metro Rail Design Criteria (MRDC) for both the maximum design earthquake (MDE) and operating design earthquake (ODE) thresholds. Accordingly, impacts related to the risk of loss, injury, or death involving strong seismic ground shaking; seismic-related ground failure, including liquefaction; and landslides would remain consistent with those analyzed in the Draft EIR.

(b) Soil Erosion

The proposed TPSS design refinement sites would require the same types of construction and operational activities in adjacent locations as those described in the Draft EIR. All mitigation measures and project features described in Section 3.8 in the Draft EIR and Section 4.12 of this Final EIR remain applicable, as the TPSS sites are not new types of facilities and are not located in areas with soils that differ substantially from those previously analyzed.

(c) Unstable Geological Unit or Soil

As the proposed TPSS design refinement locations are adjacent to those described in the Draft EIR, they are not located within a CGS-mapped liquefaction zone. Therefore, impacts associated with unstable soils and their consequences remain minimal. Project features described in Section 3.8 of the Draft EIR and Section 4.9 of this Final EIR, which address shallow groundwater in the northern portion of the project footprint where TPSS No. 1B would be located, would still apply. There is no shallow groundwater in the southern area of the project where TPSS No. 5B is located.

(d) Expansive Soils

As the proposed TPSS design refinement locations are adjacent to those described in the Draft EIR, the soil conditions for TPSS Nos. 1B and 5B are substantially the same as those described therein. Therefore, impacts associated with expansive soils creating substantial direct or indirect risks to life or property are considered minimal. Project features described in Section 3.8 of the Draft EIR and Section 4.12 of this Final EIR, which address conditions related to expansive soils, would still apply.

(e) Disposal of Wastewater

As the proposed TPSS design refinement locations are adjacent to those described in the Draft EIR, the area under study is fully developed with public infrastructure, including sewer lines. Neither the construction nor operation of TPSS Nos. 1B and 5B would require the use of a septic tank or alternative wastewater disposal systems.

(f) Paleontological Resources

The proposed TPSS design refinement locations would require excavation of a similar degree and nature as the TPSS sites described in the Draft EIR, and are located immediately adjacent to areas where soil disturbance was previously anticipated. Therefore, Mitigation Measure MM-GEO-1 would remain applicable. TPSS operations would not require excavation.

Based on the above, potential impacts associated with the TPSS design refinement sites remain consistent with the analyses and conclusions presented in Section 3.8, Geology and Soils, of the Draft EIR and Section 4.12 of this Final EIR.

3.4-1.9 Hazards and Hazardous Materials

As described in the Draft EIR, the project would result in a significant impact if it would:

a. Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials.

b. Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment.

c. Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within a quarter-mile of an existing or proposed school.

d. Be located on a site that is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, create a significant hazard to the public or the environment.

e. Be located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, as a result, create a significant safety hazard for people residing or working in the project area.

f. Be located within the vicinity of a private airstrip, as a result, create a safety hazard for people residing or working in the project area.

g. Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan.

h. Expose people or structures to a significant risk of loss, injury or death involving wildfires, including where wildland fires are adjacent to urbanized areas or where residences are intermixed with wildlands.

(a) Transport, Use, or Disposal of Hazardous Materials

Construction of the proposed TPSS design refinement sites would use the same methods as those described in the Draft EIR and would occur on or adjacent to parcels previously anticipated to be affected by the project. Thus, consistent with the Draft EIR's analysis, hazardous materials would be transported, used, or disposed of at the TPSS design refinement sites during construction. These sites overlap with the resource study area (RSA) shown in Figure 3.9-1 of the Draft EIR and are expected to contain similar sources of potentially hazardous materials that could be encountered during construction of the project as those disclosed in the Draft EIR. All project features identified in the Draft EIR related to the transport, use, or disposal of hazardous materials would apply to the construction of TPSS Nos. 1B and 5B.

With regard to the disposal of contaminated soil and groundwater, the conditions on or adjacent to the Metro ROW where the TPSS design refinement sites could be constructed are the same as those described in the Draft EIR. All relevant project features described in the Draft EIR would continue to apply to these refinements.

As the same number of TPSSs would be constructed and operated, the project's occasional operational use, storage, and disposal of hazardous materials would remain consistent with what was described in the Draft EIR.

(b) Release of Hazardous Materials into the Environment

As described in the Draft EIR, potential hazards that may be encountered within the project RSA include oil and gas pipelines, hazardous gases, contaminated groundwater, and buried utilities. Construction of the TPSS design refinement sites could involve excavation activities that may encounter the same types of hazards. However, these TPSS locations fall within the affected environment previously evaluated in the Draft EIR Section 3.9-3 and analyzed in Section 3.9-4 and Section 4.13 of this Final EIR. While the TPSS design refinements would result in a slight modification of the project footprint, they would still occur on parcels previously investigated for hazards and hazardous materials as part of the Draft EIR. The project features described in the Draft EIR would apply to these locations, helping to ensure that the proposed TPSS design refinement locations would not cause significant risks.

(c) Hazardous Materials within One-Quarter Mile of a School

The TPSS design refinement sites are located within the RSA described in the Draft EIR. Their construction and operation would not result in hazardous materials, substances, emissions, or waste being brought closer to existing or proposed schools than previously evaluated in the Draft EIR. Construction methods would be similar to those described in the Draft EIR, and because TPSS Nos. 1B and 5B are on or immediately adjacent to the evaluated project footprint, construction hauling routes would not change. As described in the Draft EIR, the project includes project features related to the transport of potentially hazardous materials near schools; those features would continue to apply with respect to the TPSS design refinement locations. TPSS Nos. 1B and 5B would also not result in operational conditions that differ from those described in the Draft EIR with respect to the potential for release of hazardous materials within a quarter-mile of existing or proposed schools.

(d) Government Code Section 65962.5

The proposed TPSS design refinement sites are not directly located on or adjacent to a site that is on a list of sites prepared pursuant to Government Code Section 65962.5 (Cortese).

(e) Airstrips

Like the rest of the project described in the Draft EIR, the proposed TPSS design refinement sites are not within or in close proximity to an airstrip.

(f) Emergency Response or Evacuation Plan

Project Feature PF-T-1 would remain part of the project for the proposed TPSS design refinement sites during construction and would require the contractor to prepare a construction traffic management plan (CTMP) that addresses emergency access during construction. The CTMP would ensure no impairment to adopted emergency response plans or emergency evacuation routes within the RSA. Additionally, the proposed TPSS design refinement locations would not alter how the project interacts with the roadways used by emergency responders during operation or affect evacuation routes or plans beyond what is described in the Draft EIR.

(g) Wildfires

Like the rest of the project described in the Draft EIR, the proposed TPSS design refinement sites are located in a highly urbanized area, and no portion of the RSA is within or close to areas prone to wildfires.

3.4-1.10 Hydrology and Water Quality

As described in the Draft EIR, the project would result in a significant impact if it would:

a. Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality.

b. Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin.

c. Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:

    i. Result in substantial erosion or siltation on- or offsite.

    ii. Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite.

    iii. Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff.

    iv. Impede or redirect flood flows.

d. In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation.

e. Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan.

Construction of the proposed TPSS design refinement locations would have similar potential to affect surface water or groundwater quality, or groundwater supplies, as the TPSS locations evaluated in the Draft EIR. As previously described, the same construction methods would be used, and construction would occur roughly in generally the same locations and under similar hydrological conditions as those analyzed in the Draft EIR. The project features described in the Draft EIR related to surface and groundwater quality and supply would continue to be part of the project.

The change in impervious surface resulting from construction of the proposed TPSS design refinement locations would be negligible, as the same total number of TPSSs would be built as described in the Draft EIR. Operation activities at TPSS Nos. 1B and 5B would not differ in any way that would result in different interactions with surface or groundwater resources than those previously evaluated.

As the proposed TPSS design refinement locations are within or immediately adjacent to the project footprint described in the Draft EIR, no substantial drainage alterations would occur during construction relative to those previously evaluated. As noted in the Draft EIR, there are no significant existing natural and manmade drainage features within the footprint, including sumps. Neither TPSS No. 1B nor 5B is located within a flood zone. Where excavation is required, the water- and soil-related best-management practices (BMPs) included as part of the project remain applicable. As the total number of TPSSs remains unchanged, the project's contribution to impervious surface would not be substantially increased, and the project's operational characteristics would remain consistent with those previously described.

Finally, TPSS Nos. 1B and 5B remain subject to the same water quality control plans and sustainable groundwater management plans discussed in the Draft EIR and would not create inconsistencies with those plans.

3.4-1.11 Utilities and Service Systems

As described in the Draft EIR, the project would result in a significant impact if it would:

a) Require or result in the relocation or construction of new or expanded water, wastewater treatment or stormwater drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects.

b) Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry, and multiple dry years.

c) Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments.

d) Generate solid waste in excess of state or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals.

e) Comply with federal, state, and local management and reduction statutes and regulations related to solid waste.

The proposed TPSS design refinement sites could interact with water, wastewater treatment, stormwater drainage, electric power, natural gas, and telecommunications facilities in slightly different ways than described in the Draft EIR, due to their revised locations. However, because the refinement sites remain adjacent to or within the previously analyzed project footprint, they have the potential to impact the same utility facilities identified in the Draft EIR. The refined TPSS sites do not conflict with any water or telecommunications facilities and would result in only minimal wastewater use and similar modifications to storm drain infrastructure as previously analyzed. As noted, TPSS Nos. 1B and 5B are alternate locations to those discussed in the Draft EIR, and the total number of TPSS sites required for the project remains unchanged. Electricity requirements during project operations would remain consistent with those evaluated in the Draft EIR, and the analysis in Section 3.11-4 remains applicable. The proposed TPSS design refinement locations would not result in a need for new or expanded natural gas infrastructure and would not expand the project's RSA into areas with publicly owned oil facilities.

Because the total number of TPSS sites remains consistent with the Draft EIR's assumptions, TPSS Nos. 1B and 5B would not alter the projected consumption of potable water, wastewater generation, or solid

waste production during either construction or operations. While the precise TPSS locations would shift slightly, the scope and intensity of activities with the potential to affect utility systems remain within the range analyzed in the Draft EIR.

Project features described in the Draft EIR related to utility infrastructure would continue to be employed as part of the project and remain consistent with the assumptions underlying the Draft EIR's impact analysis.

3.4-1.12 Energy

As described in the Draft EIR, the project would result in a significant impact if it would:

a) Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation;

b) Conflict with or obstruct a State or local plan for renewable energy or energy efficiency.

Construction methods (including fuel sources and duration) would remain consistent with those described in the Draft EIR. Because the total number of TPSS sites has not changed, construction of the project with the proposed TPSS sites would result in a similar energy consumption, using the same sources over comparable time periods. Project features related to energy use during construction would remain the same. Likewise, project operations would involve the same energy requirements as described in the Draft EIR.

3.4-1.13 Cultural Resources

As described in the Draft EIR, the project would result in a significant impact if it would:

a) Cause a substantial adverse change in the significance of a historical resource pursuant to Section 15064.5.

b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5.

c) Disturb any human remains, including those interred outside of formal cemeteries.

The RSA described in Section 3.13 of the Draft EIR encompasses the proposed TPSS design refinement sites. These refinement locations do not include built environment resources that are listed in or eligible for listing in the National Register of Historic Places (NRHP)/California Register of Historical Resources (CRHR), or listed in a local register of historical resources. As such, they do not contain historical resources as defined by CEQA.

Construction methods and duration for TPSS Nos. 1B and 5B would be the same as those described in the Draft EIR, and the proposed locations are adjacent to those previously analyzed. As with the original sites, the areas have been subject to prior disturbances, and there would be similarly limited potential to encounter intact archaeological resources. The provisions for treatment of human burials, as described in the Draft EIR, would remain applicable to the TPSS design refinement locations. TPSS Nos. 1B and 5B are not located near El Nido Park.

Mitigation Measures MM-CUL-1, MM-CUL-2, and MM-CUL-3, as described in Section 4.17 of this Final EIR, would still be applicable to constructing these TPSSs at the refined sites, consistent with their application across the entire project. Project operations would remain unchanged from those described in the Draft EIR. Accordingly, the impact conclusions related to cultural resources remain consistent with the analysis presented in Section 3.13, Cultural Resources, of the Draft EIR and Section 4.17 of Chapter 4, Corrections and Additions, of this Final EIR.

3.4-1.14 Tribal Cultural Resources

As described in the Draft EIR, the project would cause a substantial adverse change in the significance of a Tribal Cultural Resource, defined in Public Resources Code (PRC) Section 21074 as either a site, feature, place, or cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:

a) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in PRC section 5020.1(k).

b) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of PRC Section 5024.1. In applying the criteria set forth in subdivision (c) of PRC Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.

Construction methods and duration for the proposed TPSS design refinement sites would be consistent with those anticipated for the TPSSs analyzed in the Draft EIR. Because the refined locations are adjacent to those previously evaluated and are similarly disturbed, there would be a similar, limited potential to encounter intact tribal cultural resources. Operational characteristics of the TPSS design refinements remain the same as those evaluated in the Draft EIR.

TPSS Nos. 1B and 5B do not expand the RSA to areas that encompass resources that have been determined by Metro, in its discretion and supported by substantial evidence, to be significant tribal cultural resources. As described in the Draft EIR, excavations associated with construction have the potential to disturb and destroy previously unknown significant tribal cultural resources. Mitigation Measures MM-TCR-1, MM-TCR-2, and MM-TCR-3, as described in Section 4.18 of this Final EIR would be applicable to constructing the TPSS design refinements at these sites. Operational characteristics of the design refinements remain the same as those evaluated in the Draft EIR.

3.4-1.15 Public Services

As described in the Draft EIR, the project would result in a significant impact if it would:

a. Result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for:
    i. Fire protection.
    ii. Police protection.
    iii. Educational facilities.
    iv. Parks.
    v. Libraries.
b. Increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated.
c. Include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment.

Because construction methods, duration, and locations for the proposed TPSS design refinement sites would be similar to those analyzed in the Draft EIR, the project would continue to not need new or physically altered fire protection facilities, police protection facilities, schools, parks, or libraries. Project

Feature PF-T-1, which maintains emergency access during construction, would remain part of the project for the TPSS design refinements. The scale of construction would remain consistent with what was analyzed in the Draft EIR, and the refined TPSS locations would not result in an increased demand for public service from temporary construction workers. Furthermore, TPSS Nos. 1B and 5B would not alter the operations of the project, including at crossings, and would not alter the jurisdictional boundaries of stations.

Because the total number of TPSSs sites remains unchanged, the TPSS design refinements would not alter the project's potential to increase or accelerate the deterioration of park facilities. The number of construction workers required and the anticipated project ridership would remain consistent with the assumptions of the Draft EIR.

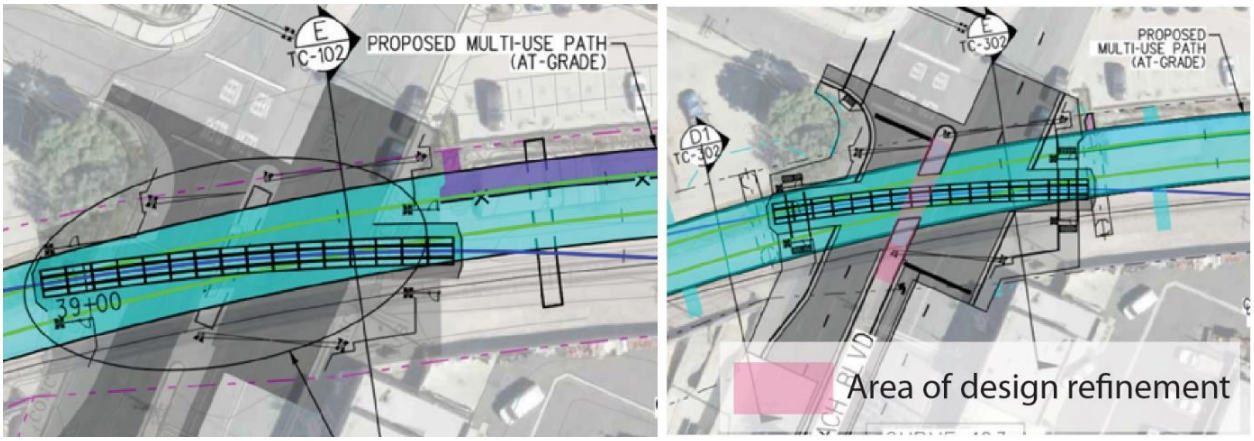
For the reasons provided above, the proposed TPSS design refinements would not result in new or more severe impacts compared to those disclosed in the Draft EIR. Therefore, the refinements would not contribute to cumulative impacts in a manner that would be cumulatively considerable compared to the project as originally proposed.

3.4-2 Manhattan Beach Boulevard Crossing

The Draft EIR analyzed an elevated structure crossing Manhattan Beach Boulevard that included a straddle bent with a center column located in the median of the roadway. The refined crossing would instead span the roadway without a center column. As shown in Figure 3.4-3, the refined crossing would cover approximately the same area as the original design. Drawings T-104 of Appendix 2-A of the Draft EIR and T-304 of Appendix B of the Final EIR further illustrate that the two designs are of similar height.

While construction methods would be slightly different between the Draft EIR and the refined design, both involve bridge structures of similar scale at the same location. As such, any variation in construction duration or technique would be minimal and would not affect the conclusions of the Draft EIR's analysis. The refined design differs from the original design primarily in its elimination of the median column and a slight lateral shift of the straddle bents on either side of the roadway. These adjustments would not result in new or more severe operational impacts compared to those identified in the Draft EIR.

Figure 3.4-3. Manhattan Beach Boulevard Crossing in Draft EIR ACE (left) and Final EIR ACE (right)



STV, 2023; 2025

3.4-2.1 Transportation

Because the proposed refined crossing structure is of similar size and located in the same areas as the crossing analyzed in the Draft EIR, any changes in construction duration or method would be negligible.

Project Feature PF-T-1, Construction Traffic Management Plan, would remain part of the project and the construction impact analysis presented in Section 3.1 of the Draft EIR remains applicable.

The refined crossing would not alter the permanent configuration or function of transit, roadway, bicycle, or pedestrian facilities on Manhattan Beach Boulevard in a manner that would affect their routine use compared to the design evaluated in the Draft EIR. While the design refinement includes a different placement of the straddle bent structure at Manhattan Beach Boulevard relative to what was described in the Draft EIR, pedestrian crossings at this location are currently prohibited and would remain prohibited. The height of the refined crossing is also similar to that previously analyzed, and as such, visibility from the east or west of the structure would not differ from that analyzed in the Draft EIR. Because the refinement maintains the fully grade-separated light rail design and preserves the existing roadway network, there would be no change in emergency access. The project's vehicle miles traveled (VMT) reduction assumptions would also remain unchanged.

Accordingly, the transportation impact conclusions remain consistent with those presented in Section 3.1, Transportation, of the Draft EIR.

3.4-2.2 Land Use and Planning

The refined crossing structure is similar in size and located in the same area as the design analyzed in the Draft EIR. As a result, any changes in construction duration or method would be negligible and the operational characteristics would remain substantially the same. The refined crossing would not alter the existing land use setting or introduce any new conflicts with applicable land use plans, policies, or regulations. Accordingly, the impact conclusions remain consistent with the analysis presented in Section 3.2, Land Use and Planning, of the Draft EIR and Section 4.6 of Chapter 4, Corrections and Additions, of this Final EIR.

3.4-2.3 Visual and Aesthetics

The refined crossing structure is similar in size and located in the same area as the design evaluated in the Draft EIR. As such, any differences in construction duration or method would be negligible, and operational characteristics would remain substantially the same. The refined crossing would not alter the visual conditions analyzed in the Draft EIR. The removal of one column at the Manhattan Beach Boulevard crossing, compared to the previously proposed design, would not increase the structure's visual prominence or introduce new or more severe visual impacts. Rather, the removal of the column would slightly reduce the structural massing over the roadway and could incrementally improve visual openness. Accordingly, the impact conclusions remain consistent with those presented in Section 3.3, Visual and Aesthetics, of the Draft EIR and Section 4.7 of Chapter 4, Corrections and Additions, of this Final EIR.

3.4-2.4 Air Quality

While the support structure over Manhattan Beach Boulevard would be refined, it would remain a similar type of structure constructed using similar methods. Construction of the refined support structure would not generate new emissions exceeding those disclosed in the Draft EIR. Operational emissions would remain unchanged, as the refined crossing does not alter the alignment or fuel source of the project. The refined crossing does not alter the project's alignment, fuel source, or impact conclusion. Accordingly, Section 3.4, Air Quality, of the Draft EIR and Section 4.8 of Chapter 4, Corrections and Additions, of this Final EIR.

3.4-2.5 Greenhouse Gas Emissions

While the support structure over Manhattan Beach Boulevard would be refined, it would remain a similar type of structure constructed using similar methods. As such, construction-related greenhouse gas emissions would not exceed those disclosed in the Draft EIR. Operational emissions would remain identical to what was analyzed in the Draft EIR, as the refined crossing does not alter the project's alignment or fuel source. Accordingly, the greenhouse gas emissions impact conclusions remain consistent with those presented in Section 3.5, Greenhouse Gas Emissions, of the Draft EIR and Section 4.9 of Chapter 4, Corrections and Additions, of this Final EIR.

3.4-2.6 Noise and Vibration

As previously discussed, the refined support structure over Manhattan Beach Boulevard would be similar in type and constructed using methods consistent with those analyzed in the Draft EIR. Because the refinement does not alter the location, height, or materials of this component of the project, operational noise and vibration levels would remain within the range previously analyzed. Accordingly, the impact conclusions for noise and vibration remain consistent with those presented in Section 3.6, Noise and Vibration, of the Draft EIR and Section 4.10 of Chapter 4, Corrections and Additions, of this Final EIR.

3.4-2.7 Biological Resources

The proposed crossing over Manhattan Beach Boulevard would involve the same type of construction at the same location and would require similar construction durations as those described in Draft EIR Sections 3.7 and 4.5-3.7. While no special-status species, riparian habitat, protected wetlands, or migratory species occur at Manhattan Beach Boulevard, Mitigation Measures MM-BIO-1, MM-BIO-2, MM-BIO-3, and MM-BIO-4 would continue to apply to reduce any potential impacts during construction to less than significant, consistent with the Draft EIR. Similarly, this location is not subject to any applicable policies, ordinances, or an adopted HCP or NCCP.

The same types of operations and operational maintenance described in the Draft EIR would occur at Manhattan Beach Boulevard under the proposed refinement. As stated, Metro's routine maintenance during operation of this crossing does not typically disturb vegetation or trees that support nesting birds. The impact conclusions for the refined crossing remain consistent with Section 3.7, Biological Resources, of the Draft EIR and Section 4.11 of Chapter 4, Corrections and Additions, of this Final EIR.

3.4-2.8 Geology and Soils

As previously discussed, while the support structure over Manhattan Beach Boulevard would be refined, it would be a similar type of structure constructed using methods consistent with those described in the Draft EIR. Because it is in the same location as the originally proposed structure evaluated in the Draft EIR, no additional geological, soil, or paleontological impacts are anticipated, and the applicable project features and mitigation measures would continue to apply. The refined crossing does not alter the location, height, or materials of this component of the project, so operational impacts would remain unchanged. The impact conclusions for the refined crossing remain consistent with Section 3.8, Geology and Soils, of the Draft EIR and Section 4.12 of Chapter 4, Corrections and Additions, of this Final EIR.

3.4-2.9 Hazards and Hazardous Materials

As previously discussed, while the support structure over Manhattan Beach Boulevard would be refined, it would be a similar type of structure constructed using methods consistent with those described in the Draft EIR. Because it is in the same location as the structure analyzed in the Draft EIR, no additional use or encounters or with hazardous materials, or changes to haul routes, are anticipated. Applicable project

features and mitigation measures would continue to apply. The refined crossing does not alter the location, height, or materials of this component of the project, so operational impacts would remain unchanged. The impact conclusions for the refined crossing remain consistent with Section 3.9, Hazards and Hazardous Materials, of the Draft EIR and Section 4.13 of Chapter 4, Corrections and Additions, of this Final EIR.

3.4-2.10 Hydrology and Water Quality

Construction of the proposed crossing refinement at Manhattan Beach Boulevard would have a similar potential to affect surface water or groundwater quality and supply as described in the Draft EIR. As previously noted, the same construction methods would be used in the same general location, with only a slight shift in the placement of the straddle bent and elimination of the median column. These minor changes are not expected to result in new hydrological conditions beyond those described in the Draft EIR. The project features described in the Draft EIR were designed to address straddle bent construction and site conditions at the crossing location would continue to apply. The change in impervious surface associated with the crossing refinement would be negligible, due to its similar footprint. Operational characteristics would remain unchanged.

As the crossing remains in the same location analyzed in the Draft EIR, there are no significant existing natural and manmade drainage features within the footprint, including sumps; nor is it located in a flood zone. The BMPs identified as project features in the Draft EIR related to excavations would continue to be employed and remain consistent with the assumptions underlying the impact analysis related to erosion or siltation, runoff, floods, or flood flows. Similarly, the consistent location of the crossing means it is subject to the same water quality control plans and sustainable groundwater management plans described in the Draft EIR.

The impact conclusions for the refined crossing remain consistent with Section 3.10, Hydrology and Water Quality, of the Draft EIR and Section 4.14 of Chapter 4, Corrections and Additions, of this Final EIR.

3.4-2.11 Utilities and Service Systems

As previously discussed, while the support structure over Manhattan Beach Boulevard would be refined, it would be a similar type of structure constructed using methods consistent with those described in the Draft EIR. Because of this, it would interact with wastewater treatment, stormwater drainage, electric power, natural gas, and telecommunications facilities in the same manner as the structure analyzed in the Draft EIR, during both construction and operation. Water consumption would also be comparable; however, one of the three water lines previously identified for relocation would no longer need to be relocated, as the revised column placement for the straddle bents would avoid the water line at that location.

With minimal construction and no operational differences, the proposed refined crossing would not alter consumption of potable water, wastewater generation, or production of solid waste during construction or operation compared to what was analyzed in the Draft EIR.

The project features described in the Draft EIR and Final EIR would continue to be employed and would function as described with respect to utility infrastructure. The impact conclusions for the refined crossing remain consistent with Section 3.11, Utilities and Service Systems, of the Draft EIR and Section 4.15 of Chapter 4, Corrections and Additions, of this Final EIR.

3.4-2.12 Energy

While the support structure over Manhattan Beach Boulevard would be refined, it would be a similar type of structure constructed using methods consistent with those described in the Draft EIR. It would not result in the use of additional or different energy sources than those discussed in the Draft EIR. Operational energy use would remain unchanged, as the refined crossing does not alter the alignment or fuel source of the project. The impact conclusions for the refined crossing remain consistent with Section 3.12, Energy, of the Draft EIR and Section 4.16 of Chapter 4, Corrections and Additions, of this Final EIR.

3.4-2.13 Cultural Resources

Because the location of the crossing refinement is the same as that analyzed in the Draft EIR, the RSA described in Section 3.13 of the Draft EIR includes the Manhattan Beach Boulevard crossing refinement. This area does not contain built environment resources that are listed or eligible for listing in the NRHP/CRHR, or listed in a local register of historical resources. As such, the area does not contain historical resources as defined by CEQA.

As construction methods, location, and duration for the proposed crossing refinement would be the same as those described in the Draft EIR, there would be a similarly limited potential to encounter intact archaeological resources, due to prior disturbance of the area. The provisions for treatment of human burials, as described in the Draft EIR, would remain applicable to the refined crossing, and the refinement is not located near El Nido Park.

Mitigation Measures MM-CUL-1, MM-CUL-2, MM-CUL-3, as described in Section 4.17 of this Final EIR, would still be applicable to constructing the refined crossing. Operational conditions of the refined crossing remain consistent with those evaluated in the Draft EIR. The impact conclusions for the refined crossing remain consistent with Section 3.13, Cultural Resources, of the Draft EIR and Section 4.17 of Chapter 4, Corrections and Additions, of this Final EIR.

3.4-2.14 Tribal Cultural Resources

As construction methods, location, and duration for the crossing refinement at Manhattan Beach Boulevard would be the same as those analyzed in the Draft EIR, there would be a similarly limited potential to encounter intact tribal cultural resources, due to prior disturbance of the area. Mitigation Measures MM-TCR-1, MM-TCR-2, and MM-TCR-3, as described in Section 4.18 of this Final EIR, would be applicable to constructing the refined crossing.

The refined crossing does not expand the RSA into areas that contain resources determined by Metro, in its discretion and supported by substantial evidence, to be significant tribal cultural resources. As described in the Draft EIR, excavation activities associated with construction have the potential to disturb and destroy previously unknown significant tribal cultural resources. MM-TCR-1, MM-TCR-2, and MM-TCR-3, as described in Section 4.18 of this Final EIR, would apply to the refined crossing at Manhattan Beach Boulevard. Operational characteristics would remain unchanged.

The impact conclusions for the refined crossing remain consistent with Section 3.14, Tribal Cultural Resources, of the Draft EIR and Section 4.18 of Chapter 4, Corrections and Additions, of this Final EIR.

3.4-2.15 Public Services

As construction methods, location, and duration for the crossing refinement would be the same as those analyzed in the Draft EIR, there remains no need to acquire or alter fire protection facilities, police protection facilities, schools, parks, or libraries. Project Feature PF-T-1 would continue to maintain emergency access during construction. Additionally, because the scale of construction remains

consistent with what was analyzed in the Draft EIR, no additional demand on public services from temporary workers is anticipated. The refined crossing would not alter the operations of the project, as it would still be elevated over Manhattan Beach Boulevard, and it would not change the governmental jurisdiction of stations.

Because the refined crossing is in the same location and of the same scale as the design described in the Draft EIR, it would not increase the potential for deterioration of park facilities through increased workforce presence or use. The number of construction workers required and the projected ridership would remain the same as previously analyzed.

The impact conclusions for the refined crossing remain consistent with Section 3.15, Public Services, of the Draft EIR and Section 4.19 of Chapter 4, Corrections and Additions, of this Final EIR.

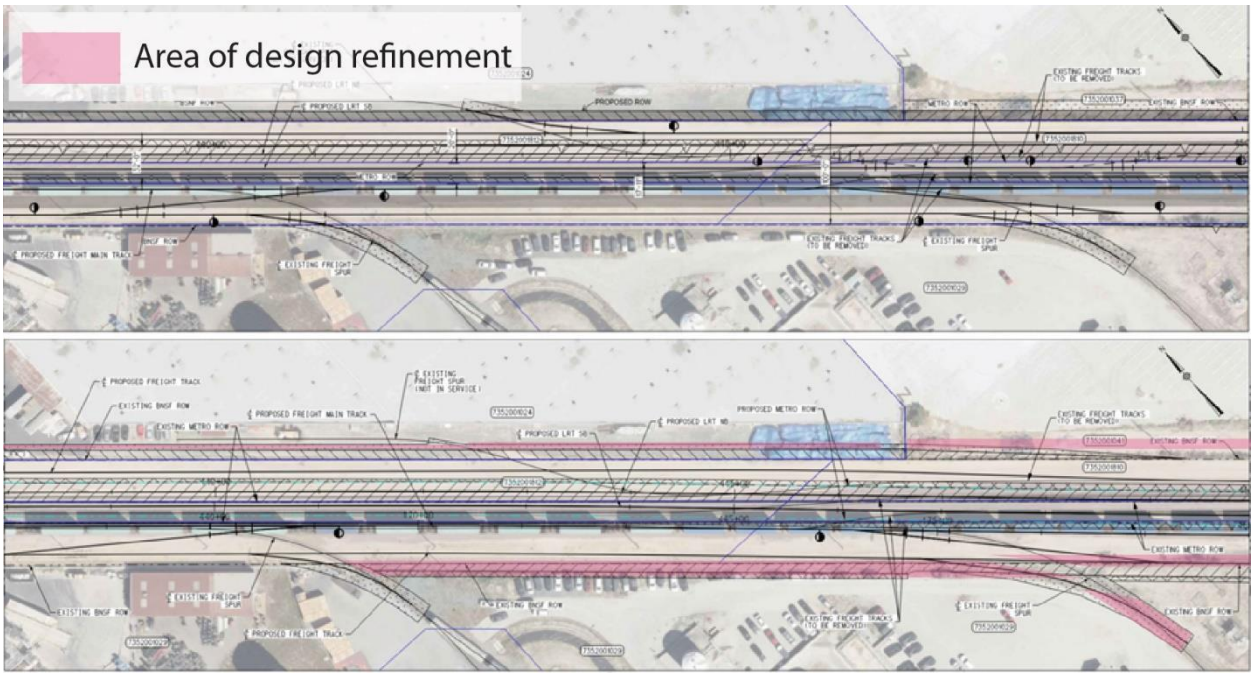
As described above, the refined crossing would not result in new or more severe impacts compared to those disclosed in the Draft EIR; therefore, the refined crossing would not contribute to cumulative impacts in a manner that would be cumulatively considerable compared to the project as originally proposed.

3.4-3 Freight Track Relocation and Maintenance Access Path

The Draft EIR evaluated track shifts and widening of the Metro and BNSF ROW south of 190th Street in the highly industrialized areas of the corridor in Torrance. After the publication of the Draft EIR, Metro continued coordination with local stakeholders, including BNSF and business or property owners adjacent to the Metro and BNSF ROW. Coordination with BNSF resulted in refinements to the project design to provide maintenance access paths parallel to freight tracks, which otherwise would have been no longer accessible from the edge of the ROW with the addition of light rail tracks. The addition of these maintenance access paths expanded the ROW approximately five feet to the southwest between 190th Street and just south of Del Amo Boulevard. Additionally, the proposed design of light rail, freight tracks, paths, and other ancillary facilities was shifted to the south between Prairie Avenue and Del Amo Boulevard to avoid encroachment into the Torrance Refining Company's property and ensure safe and secure operations. Such refinements further expand the ROW to the southwest in these areas. The latter refinement also resulted in modifications to the bridges at Prairie Avenue and Del Amo Boulevard, discussed further in Section 3.4-4.

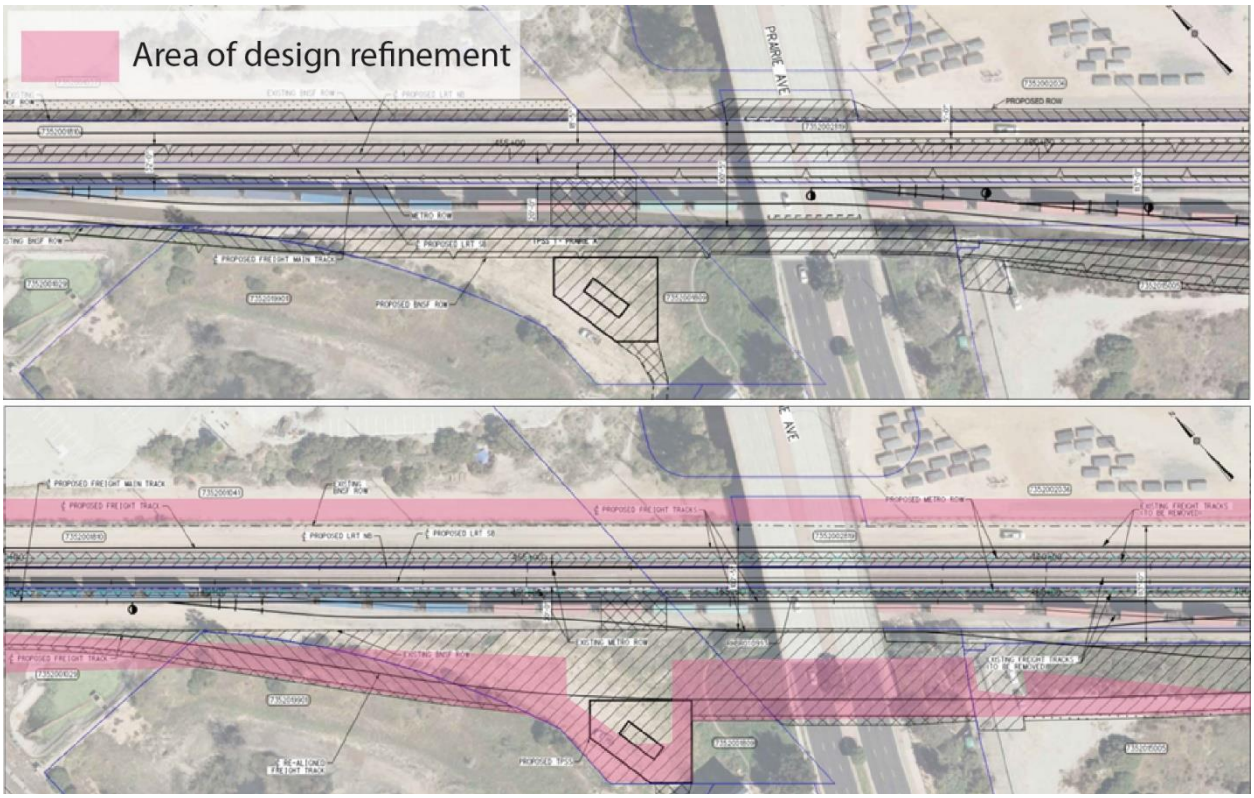
Figure 3.4-4, Figure 3.4-5, Figure 3.4-6, Figure 3.4-7, and Figure 3.4-8 compare the ROW of the Draft EIR's Appendix 2-A, Select Advanced Conceptual Engineering Drawings, and this Final EIR's Appendix B, Select Advanced Conceptual Engineering Drawings - Locally Preferred Alternative, from south of 190th Street to South of Del Amo Boulevard. Figure 3.4-4 and Figure 3.4-8 show minimal expansion, by a matter of several feet into the adjacent industrial properties. Figure 3.4-5, Figure 3.4-6, and Figure 3.4-7 show more noticeable expansion into the adjacent industrial properties. In all cases, these impacts to properties do not require full acquisitions that would prevent them from continuing their business operations and are largely sliver takes of areas without permanent structures or equipment.

Figure 3.4-4. Proposed ROW South of 190th Street in Draft EIR ACE (top) and Final EIR ACE (bottom)



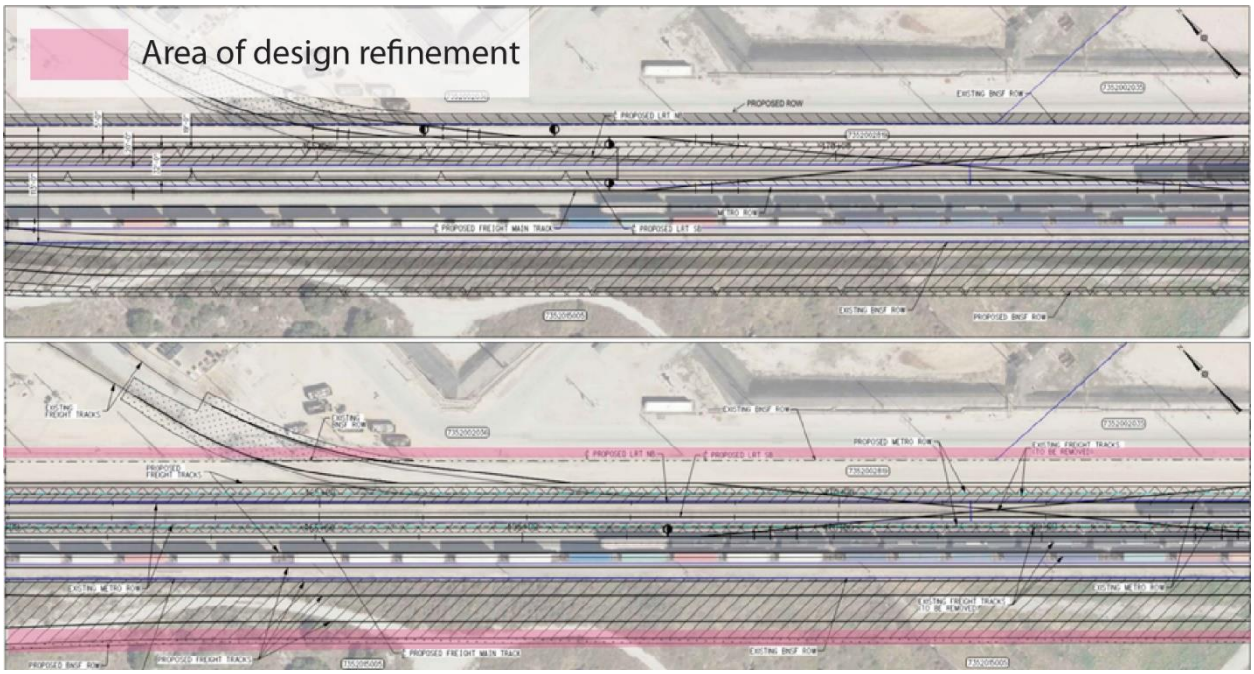
Source: STV, 2023; 2025

Figure 3.4-5. Proposed ROW in the Vicinity of Prairie Avenue in Draft EIR ACE (top) and Final EIR ACE (bottom)



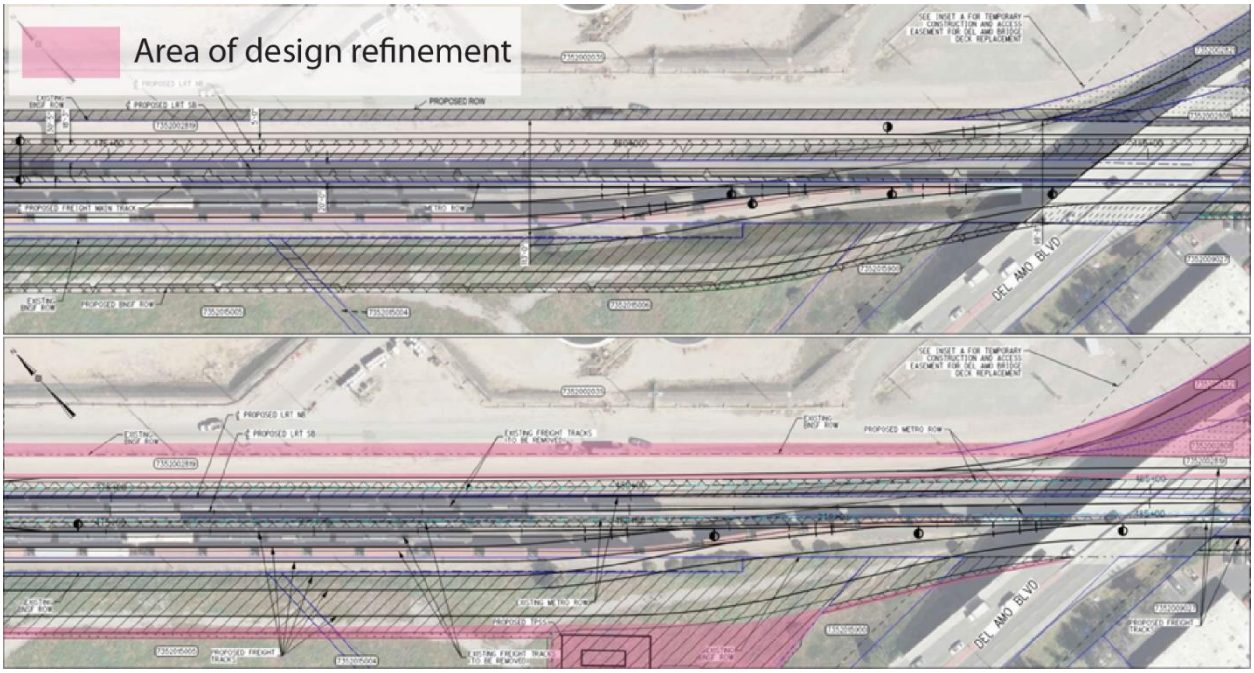
Source: STV, 2023; 2025

Figure 3.4-6. Proposed ROW between Prairie Avenue and Del Amo Boulevard in Draft EIR ACE (top) and Final EIR ACE (bottom)



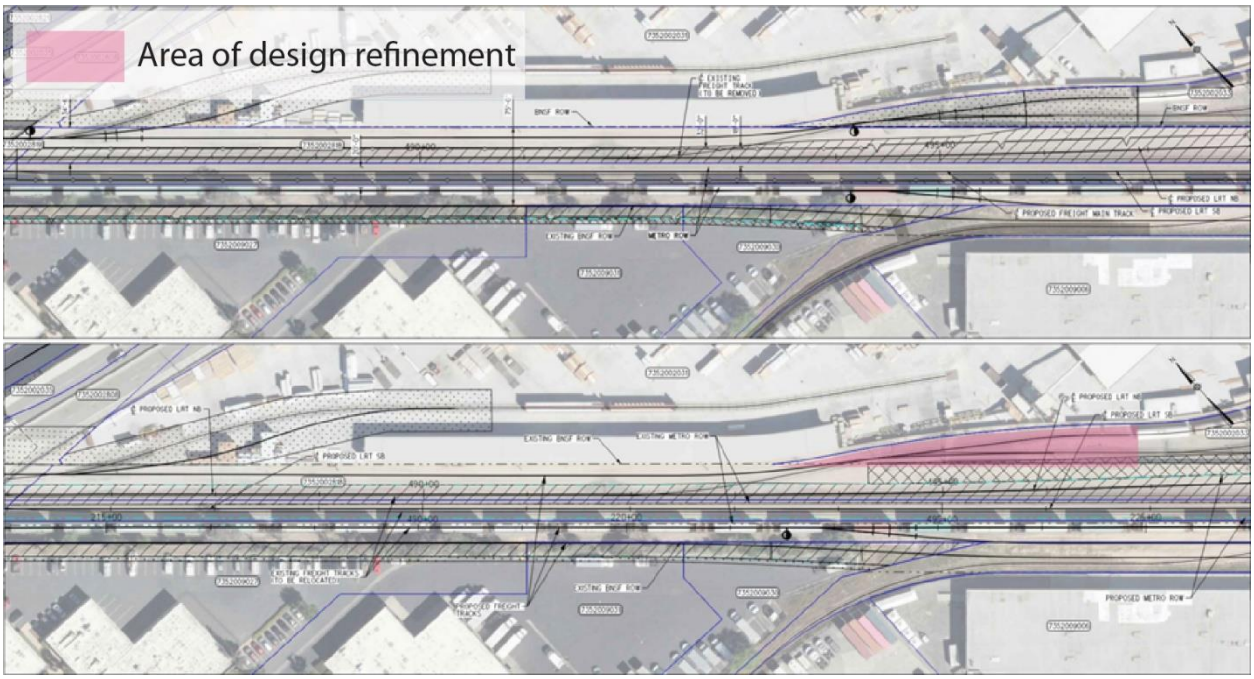
Source: STV, 2023; 2025

Figure 3.4-7. Proposed ROW North of Del Amo Boulevard in Draft EIR ACE (top) and Final EIR ACE (bottom)



Source: STV, 2023; 2025

Figure 3.4-8. Proposed ROW South of Del Amo Boulevard in Draft EIR ACE (top) and Final EIR ACE (bottom)



Source: STV, 2023; 2025

3.4-3.1 Transportation

The freight track and maintenance access path refinements expand the project footprint slightly. However, the small scale of the added work needed to construct these paths would be negligible and have limited interaction with the transportation network relative to what was described in the Draft EIR, as the added work would largely take place within the ROW and private industrial properties. The freight track and maintenance access path refinements would not alter the permanent conditions of transit, roadway, bicycle, and pedestrian facilities in a manner that would affect their routine use differently than described in the Draft EIR, nor would they require permanent alteration of the roadway network, including changes to local pedestrian access, or create a visibility obstruction. Because the freight track and maintenance access paths refinements would not alter the nature of the grade-separated light rail and would maintain the existing roadway network, there would be no effect on emergency access.

Therefore, transportation impacts related to the freight track and maintenance access path refinements remain consistent with Section 3.1, Transportation, of the Draft EIR and Section 4.5 of Chapter 4, Corrections and Additions, of this Final EIR.

3.4-3.2 Land Use and Planning

The freight track and maintenance access path refinements would remain within industrial areas away from sensitive residential and commercial uses; they would also occur within or adjacent to the existing Metro ROW, avoiding impacts to established communities. The plans, policies, and regulations identified in the Draft EIR are the same as those that would apply to the area affected by the freight track and maintenance access path refinements. Because the freight track and maintenance access path refinements do not change the existing land use setting or conflict with the described plans and policies during operation, the impact conclusions for the refinements remain consistent with Section 3.2, Land Use and Planning, of the Draft EIR and Section 4.6 of Chapter 4, Corrections and Additions, of this Final EIR.

3.4-3.3 Visual and Aesthetics

The proposed freight track and maintenance access path refinements are located immediately adjacent to the Metro ROW and the Draft EIR establishes that there are no scenic vistas or state scenic highways in the RSA.

While the freight track and maintenance access path refinements expand the footprint slightly, the small scale of the added work needed to construct these paths means changes to construction activities relative to what was described in the Draft EIR would be negligible. Additionally, construction would be in an industrial area where construction of light rail track, relocation of freight track, and roadway bridge construction have already been analyzed in the Draft EIR. Therefore, the overall visual conditions during construction would be of a similar nature as that described in the Draft EIR. Operationally, the proposed freight track and maintenance access path refinements would be visually similar to the surrounding industrial area. Therefore, they would not conflict with applicable zoning or other regulations governing scenic quality. The proposed freight track and maintenance access path refinements are not located near outdoor recreation facilities or other public areas that could be affected by a new source of light or glare, nor would an atypical amount of light or glare emanate from the proposed freight track and maintenance access path refinements under operational conditions relative to their surroundings. Therefore, the impact conclusions for the refinements remain consistent with Section 3.3, Visual and Aesthetics, of the Draft EIR and Section 4.7 of Chapter 4, Corrections and Additions, of this Final EIR.

3.4-3.4 Air Quality

The freight track and maintenance access path refinements could represent a marginal increase in construction, but not to the extent that construction durations would be altered or maximum daily emissions would meaningfully increase, considering the proximity and similarity of work proposed in the Draft EIR in this area. There are no residential, educational, or long-term medical care facilities within 500 feet of the alignment in this area. Thus, the expanded construction area footprint and future vehicular service trips along the maintenance road would not generate localized emissions that could affect sensitive receptors.

Operational emissions would remain identical to what was analyzed in the Draft EIR, as the freight track and maintenance access path refinements do not alter the alignment or fuel source of the project. The impact conclusions for the refinements remain consistent with Section 3.4, Air Quality, of the Draft EIR and Section 4.8 of Chapter 4, Corrections and Additions, of this Final EIR.

3.4-3.5 Greenhouse Gas Emissions

As with air quality, freight track and maintenance access path refinements could represent a marginal increase in construction, but not to the extent that construction durations would be altered or maximum daily emissions would meaningfully increase. Operational emissions would remain identical to those analyzed in the Draft EIR, as the freight track and maintenance access path refinements do not alter the alignment or fuel source of the project. The impact conclusions for the refinements remain consistent with Section 3.5, Greenhouse Gas Emissions, of the Draft EIR and Section 4.9 of Chapter 4, Corrections and Additions, of this Final EIR.

3.4-3.6 Noise and Vibration

Construction and operation of proposed freight track and maintenance access path refinements have the potential to alter ambient noise levels. Figure 4.21-3, Figure 4.21-4, and Figure 4.21-5 in Chapter 4, Corrections and Additions, show the areas of the proposed freight track and maintenance access path refinements in the context of nearby sensitive receptors. These figures show that there are no sensitive receptors in the vicinity and the refinements would not bring the railroad ROW any closer to sensitive

receptors. Mitigation measures identified in the Draft EIR would still apply. Therefore, the freight track and maintenance access path refinements would not result in the exceedance of FTA noise standards during operation or increase the already significant impact (which is located elsewhere along the alignment) during construction.

Figure 4.21-26, Figure 4.21-27, Figure 4.21-28, Figure 4.21-29, Figure 4.21-30, Figure 4.21-31, Figure 4.21-32, and Figure 4.21-33 in Chapter 4 of this Final EIR show where vibration sensitive receptors and impacts are located. None of the figures include sensitive receptors within the area of the freight track and maintenance access path refinements. The impact conclusions for the refinements remain consistent with Section 3.6, Noise and Vibration, of the Draft EIR and Section 4.10 of Chapter 4, Corrections and Additions, of this Final EIR.

3.4-3.7 Biological Resources

The proposed freight track and maintenance access path refinements would use the same construction methods, occur adjacent to the same project footprint, take place on heavily industrialized properties, and occur over similar durations as those described in the Draft EIR. While no special-status species, riparian habitat, protected wetlands, nor migratory species occur in the area of these refinements, Mitigation Measures MM-BIO-1, MM-BIO-2, MM-BIO-3, and MM-BIO-4 would still be applicable to mitigate any potential impacts during construction to less than significant, consistent with the Draft EIR. Similarly, these locations are not subject to any applicable policies, ordinances, or an adopted HCP or NCCP.

The same types of operational maintenance described in the Draft EIR would occur along the proposed freight track and maintenance access path. As stated, Metro routine maintenance during operation of this project component does not typically disturb vegetation or trees that support nesting birds. The impact conclusions for the refinements remain consistent with Section 3.7, Biological Resources, of the Draft EIR and Section 4.11 of Chapter 4, Corrections and Additions, of this Final EIR.

3.4-3.8 Geology and Soils

(a) Exposure of People or Structures to Adverse Effects

The proposed freight track and maintenance access path refinements would remain outside any known fault zones or CGS-mapped AP Earthquake Fault Zones. Therefore, construction and operation of the refinements would have no impact related to fault rupture.

As the proposed freight track and maintenance access path refinements are adjacent to the Metro ROW and located on parcels adjacent to those previously anticipated to be affected by the project, they would not require substantial changes to the location, number of workers, or types of equipment. The same design approach to accommodate the high seismic ground motion and associated consequences (such as liquefaction-induced vertical settlements or lateral spreading), if any, would apply, as the maintenance access paths would not require new construction methods and would perform in accordance with the MRDC MDE and ODE thresholds during operations. For similar reasons, impacts related to the risk of loss, injury, or death involving strong seismic ground shaking; seismic-related ground failure, including liquefaction; and landslides would remain consistent with the Draft EIR.

(b) Soil Erosion

The proposed freight track and maintenance access path refinements would require the same types of construction and operational activities immediately adjacent to the Metro ROW as described in the Draft EIR. All mitigation measures and project features described in Section 3.8 in the Draft EIR and

Section 4.12 of this Final EIR would apply as the refinements do not involve new types of features or substantially different soils.

(c) Unstable Geological Unit or Soil

As the proposed freight track and maintenance access path refinements are adjacent to the Metro ROW, as described in the Draft EIR, they are not located within a CGS-mapped liquefaction zone. Therefore, impacts associated with unstable soils and their consequences would remain less than significant.

(d) Expansive Soils

As the freight track and maintenance access path refinements are adjacent to the Metro ROW, as described in the Draft EIR, impacts associated with expansive soils creating substantial direct or indirect risks to life or property would remain less than significant. Additionally, the project features related to expansive soils described in Draft EIR Section 3.8 and Section 4.12 of this Final EIR would continue to be employed as part of the project and the refinements would remain consistent with the assumptions underlying the Draft EIR.

(e) Disposal of Wastewater

As the proposed freight track and maintenance access path refinements are adjacent to the Metro ROW, the area under study is fully developed with public infrastructure, including sewer lines. Neither construction nor operation of the refinements would require the use of a septic tank or alternative wastewater disposal systems.

(f) Paleontological Resources

The freight track and maintenance access path refinements could require shallow excavation to a similar degree and nature as the work evaluated in the Draft EIR and Mitigation Measure MM-GEO-1 would remain applicable.

Based on the above, the impact conclusions for the proposed freight track and maintenance access path refinements remain consistent with Section 3.8, Geology and Soils, of the Draft EIR and Section 4.12 of Chapter 4, Corrections and Additions, of this Final EIR.

3.4-3.9 Hazards and Hazardous Materials

(a) Transport, Use, or Disposal of Hazardous Materials

Construction of the freight track and maintenance access path refinements would use the same methods as described in the Draft EIR and would be located on and/or adjacent to parcels already proposed to be impacted by the project and evaluated in the Draft EIR. Thus, similar hazardous materials as those evaluated in the Draft EIR would be transported, used, or disposed of during construction. The locations of the refinements overlap with the RSA shown in Figure 3.9-1 of the Draft EIR and would involve similar sources of potentially hazardous materials that could be encountered during project construction. All project features would remain applicable to constructing the freight tracks and maintenance access paths.

With regard to disposal of contaminated soil and groundwater, the conditions on or adjacent to the Metro ROW where the freight track and maintenance access path refinements would occur are the same as those described in the Draft EIR. Because these conditions are the same, all project features described in the Draft EIR pertaining to the disposal of contaminated soil and groundwater would continue to be employed as part of the project and the refinements would remain consistent with the assumptions underlying the Draft EIR.

The freight track and maintenance access path refinements would not change the project's occasional operational use, storage, and disposal of hazardous materials described in the Draft EIR.

(b) Release of Hazardous Materials into the Environment

As described in the Draft EIR, potential hazards that may be encountered in the project RSA include oil and gas pipelines, hazardous gases, contaminated groundwater, and buried utilities. Construction of the freight track and maintenance access path refinements could involve activities that disturb the ground and could encounter these same hazards. However, the freight track and maintenance access path refinements fall within the affected environment previously reviewed in Draft EIR Section 3.9-3 and Section 3.9-4, and further evaluated in Section 4.13 of this Final EIR. While the refinements would slightly alter the project footprint, all construction would occur on parcels that have already been investigated for hazards and hazardous materials. The project features described in the Draft EIR would apply to these locations as part of the project, ensuring that the proposed freight track and maintenance access path refinements do not cause significant risks.

(c) Hazardous Materials within One-Quarter Mile of a School

The proposed freight track and maintenance access path refinements are in a heavily industrialized area with a footprint directly adjacent to what was analyzed in the Draft EIR; therefore, their construction and operation would not bring hazardous materials, substances, emissions, or waste materially closer to existing or proposed schools.

Since the refinements are located on or immediately adjacent to the original footprint, they would not alter construction hauling routes. The project features regarding transporting potentially hazardous materials apply to the refinements as part of the project. The refinements would not change the operational conditions that could lead to the release of hazardous materials within a quarter-mile of existing or proposed schools beyond those described in the Draft EIR.

(d) Government Code Section 65962.5

The proposed freight track and maintenance access path refinement would require a temporary construction easement on the North Posse Site, which is listed pursuant to Government Code Section 65962.5. As described in Section 3.9-4.4 of the Draft EIR, the Draft EIR assumes use of this site for temporary construction activities and analyzed the associated conditions accordingly. The freight track and maintenance access path refinements would involve similar types of construction activities in the same general area as previously analyzed. Because the nature, location and intensity of the refinements are consistent with what was already evaluated, the environmental conditions and potential hazards remain the same. Therefore, the conclusions of the Draft EIR regarding potential impacts from construction on the North Posse Site remain valid. The project features project features described in Section 3.9-4.4 of the Draft EIR would still apply, including the recommendation for a Phase II site investigation. As described in the Draft EIR, the Phase II investigation is recommended to evaluate soils and groundwater for total petroleum hydrocarbons (TPH), volatile organic compounds (VOC), semi-volatile organic compounds (SVOC), asbestos-containing materials (ACM), and metals along the alignment between Prairie Avenue and Del Amo Boulevard.

(e) Airstrips

Like the project components evaluated in the Draft EIR, the proposed freight track and maintenance access path refinements are not located within or close proximity to an airstrip. Therefore, they would not result in any related impacts.

(f) Emergency Response or Evacuation Plan

Project Feature PF-T-1, which requires preparation of a CTMP, would remain part of the project with the proposed refinements. The CTMP is a component of the proposed project and would address emergency access during construction to ensure continued compliance with adopted emergency response plans and evacuation routes within the RSA. The refinements would not alter how the project interacts with access routes or roadways used by emergency responders during operation. Therefore, potential impacts related to emergency response or evacuation would be the same as described in the Draft EIR.

(g) Wildfires

As with the project components evaluated in the Draft EIR, the freight track and maintenance access path refinements are located in a highly urbanized area, and no portion of the RSA is within or near areas prone to wildfires. As such, wildfire-related impacts would not occur.

Based on the above, the impact conclusions for the proposed freight track and maintenance access path refinements remain consistent with Section 3.9, Hazards and Hazardous Materials, of the Draft EIR and Section 4.13 of Chapter 4, Corrections and Additions, of this Final EIR.

3.4-3.10 Hydrology and Water Quality

Construction of the proposed freight track and maintenance access path refinements has a similar potential to introduce contamination to surface and groundwater or impact groundwater supplies as the construction described in the Draft EIR. As previously described, the same types of construction methods would be used for the proposed freight track and maintenance access path refinements and construction would occur roughly in the same locations in roughly the same hydrological conditions as those described in the Draft EIR. As the project features described in the Draft EIR were designed to address construction and operation of rail infrastructure, including ancillary facilities such as maintenance paths, they continue to support the conclusion that there would be no significant impacts to surface and groundwater quality and supply.

The change in impervious surface as a result of proposed freight track and maintenance access path refinements would be negligible, as the paths require approximately five feet and would occur on already highly developed land. While Figure 3.4-5, Figure 3.4-6, and Figure 3.4-7 of the Final EIR, show a larger expansion of the footprint southwestward, this is largely a result of a shift from the northeast and does not represent a substantial net increase of impervious surface compared to what was analyzed in the Draft EIR. Operations would not be altered as a result of the proposed freight track and maintenance access path refinements in a way that would interact with surface or groundwater any differently than the operations described in the Draft EIR.

As the proposed freight track and maintenance access path refinements occur immediately adjacent to the footprint described in the Draft EIR, no substantial drainage alterations would occur during construction relative to those described in the Draft EIR, as there are no significant existing natural and manmade drainage features within the footprint, including sumps. In addition, the proposed freight track and maintenance access path refinements are not located in a flood zone. Where excavation is required, the BMPs described as part of the project features in the Draft EIR would remain valid and allow the project refinements to avoid impacts related to erosion or siltation, runoff, floods, or flood flows.

The proposed freight track and maintenance access path refinements are subject to the same water quality control plans and sustainable groundwater management plans that apply to the project components evaluated in the Draft EIR. The project features described in the Draft EIR would remain

effective at avoiding impacts related to conflicts with water supply and groundwater management plans. The impact conclusions for the refinements remain consistent with Section 3.10, Hydrology and Water Quality, of the Draft EIR and Section 4.14 of Chapter 4, Corrections and Additions, of this Final EIR.

3.4-3.11 Utilities and Service Systems

The proposed freight track and maintenance access path refinements would interact with water, wastewater treatment, stormwater drainage, electric power, natural gas, and telecommunications facilities in slightly different ways than the project as described in the Draft EIR due to the expanded footprint. However, because the refinements are adjacent to or overlap the previously analyzed project footprint, they have the potential to affect the same utility facilities analyzed in the Draft EIR. The proposed refinements do not conflict with any water or telecommunications facilities and would involve the same basic types of construction at the same or adjacent locations as described in the Draft EIR. Thus, they would require only minimal wastewater use and the same types of modifications to storm drain infrastructure. Electricity requirements during project operations would not change with the proposed freight track and maintenance access path refinements and the analysis in Section 3.11-4 of the Draft EIR remains valid. The proposed freight track and maintenance access path refinements would have no potential to require new or expanded natural gas or oil facilities, do not expand the RSA into areas with publicly owned oil facilities, and would not require the project to use natural gas or oil during operations.

The proposed freight track and maintenance access path refinements would not change the consumption of potable water, wastewater generation, or solid waste during construction or operation compared to what was analyzed in the Draft EIR. While the footprint would expand and shift slightly, the overall scope and intensity of water-consuming and wastewater- and solid-waste-generating activities would remain within the range analyzed in the Draft EIR.

The project features described in the Draft EIR remain applicable to the refinements and continue to support the conclusion that impacts to utility systems would not exceed significance thresholds during construction or operation. The impact conclusions for the proposed freight track and maintenance access path refinements remain consistent with Section 3.11, Utilities and Service Systems, of the Draft EIR and Section 4.15 of Chapter 4, Corrections and Additions, of this Final EIR.

3.4-3.12 Energy

Like air quality and greenhouse gas emissions, while the proposed freight track and maintenance access path refinements would slightly expand the footprint, they would involve a similar scope of construction and use the same construction methods as those described in the Draft EIR. They would also not use more or rely on different energy sources than what is reported in the Draft EIR. Operational energy use would remain identical to what was analyzed in the Draft EIR, as the proposed refinements do not alter the fuel source of the project or substantially change the alignment. The impact conclusions for the refinements remain consistent with Section 3.12, Energy, of the Draft EIR and Section 4.16 of Chapter 4, Corrections and Additions, of this Final EIR.

3.4-3.13 Cultural Resources

The RSA described in Section 3.13 of the Draft EIR is inclusive of the proposed freight track and maintenance access path refinements and does not include any built environment resources that meet the NRHP/CRHR criteria for eligibility or are considered historical resources for the purposes of CEQA.

As construction methods and duration would be similar for the proposed refinements, and locations would be adjacent to those described in the Draft EIR, there would be a similarly limited potential to encounter intact archaeological resources, due to prior disturbance of the area. The provisions for

treatment of human burials as described in the Draft EIR would continue to apply to the design refinements, and the proposed freight track and maintenance access path refinements are not located near El Nido Park.

Mitigation Measures MM-CUL-1, MM-CUL-2, and MM-CUL-3, as described in Section 4.17 of this Final EIR, would still apply to construction of the proposed freight track and maintenance access path refinements. Operational characteristics would be the same as those described in the Draft EIR. The impact conclusions for the proposed freight track and maintenance access path refinements remain consistent with Section 3.13, Cultural Resources, of the Draft EIR and Section 4.17 of Chapter 4, Corrections and Additions, of this Final EIR.

3.4-3.14 Tribal Cultural Resources

As construction methods and duration would be similar for the proposed freight track and maintenance access path refinements, and locations would be adjacent to those analyzed for the project in the Draft EIR, there would be a similarly limited potential to encounter intact tribal cultural resources due to prior disturbance of the area. Operations would be the same as those described in the Draft EIR.

The proposed freight track and maintenance access path refinements do not expand the RSA to areas that encompass resources that have been determined by Metro, in its discretion and supported by substantial evidence, to be significant tribal cultural resources. As described in the Draft EIR, excavations associated with construction have the potential to disturb and destroy previously unknown significant tribal cultural resources. Mitigation Measures MM-TCR-1, MM-TCR-2, and MM-TCR-3, as described in Section 4.18 of this Final EIR, would be applicable. Operational conditions would be the same as those described in the Draft EIR. The impact conclusions for the proposed freight track and maintenance access path refinements remain consistent with Section 3.14, Tribal Cultural Resources, of the Draft EIR and Section 4.18 of Chapter 4, Corrections and Additions, of this Final EIR.

3.4-3.15 Public Services

As construction methods and duration for the proposed freight track and maintenance access path refinements and locations would be adjacent to those analyzed for the project in the Draft EIR, there remains no need to acquire or alter fire protection facilities, police protection facilities, schools, parks, or libraries. Project Feature PF-T-1 would remain part of the project to ensure emergency access during construction. The refinements requiring the same scale of construction to what was analyzed in the Draft EIR would ensure no additional demand would be placed on these government facilities by temporary workers. The proposed freight track and maintenance access path refinements would not alter the operations of the project, including at crossings, nor change the governmental jurisdiction of stations.

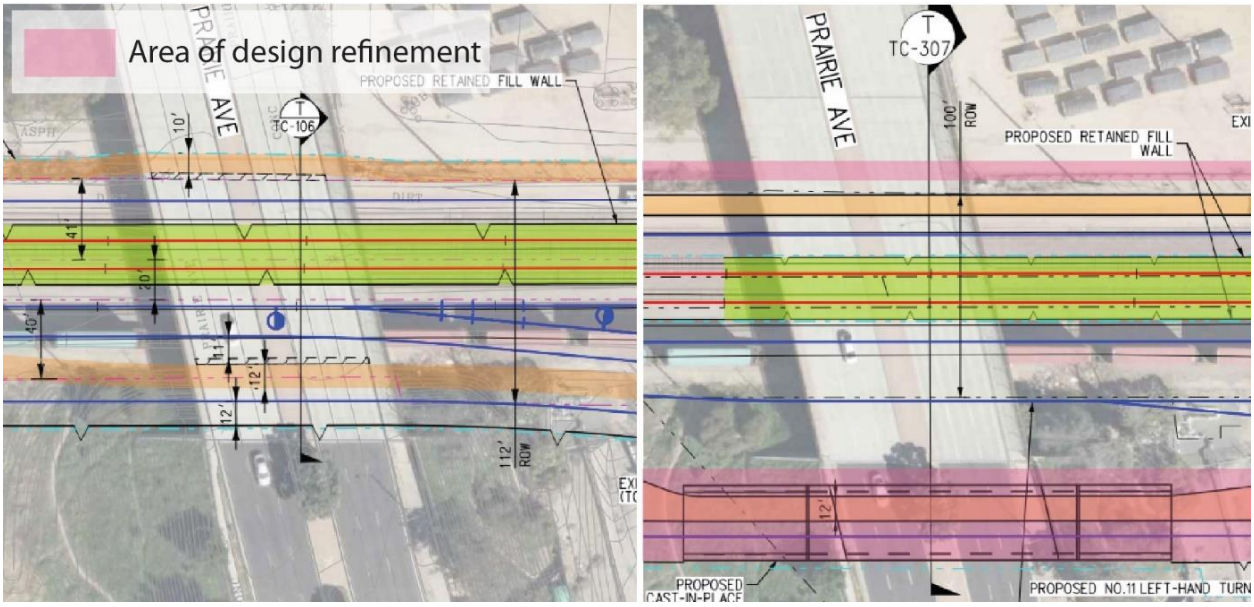
Because the increase in project footprint would be minimal, they would not change the project's potential to increase or accelerate deterioration of park facilities. The number of construction workers the proposed freight track and maintenance access path refinements would require would be similar to those described in the Draft EIR, and the number of riders the project would attract would remain the same.

As described above, the proposed freight track and maintenance access path refinements would not result in new or more severe impacts compared to those disclosed in the Draft EIR; therefore, the refinements would not contribute to cumulative impacts in a manner that would be cumulatively considerable compared to the project as originally proposed.

3.4-4 Prairie Avenue and Del Amo Boulevard Bridges

As described in Section 3.4-3 of this Final EIR, continued coordination after the publication of the Draft EIR resulted in shifting the design of the project southwestward, south of 190th Street. This shift in alignment resulted in changes to the proposed design of two roadway bridges that cross over the Metro and BNSF ROW: Prairie Avenue and Del Amo Boulevard. In the design analyzed in the Draft EIR, no major structural work was proposed at Prairie Avenue, as there was sufficient space to construct the required freight tracks on the southwest side of the ROW without modifying the bridge. In the refined design, however, a box tunnel would be constructed on the southwest side of the ROW to allow the realigned freight track to pass through. Figure 3.4-9 compares the Draft EIR's Appendix 2-A, Select Advanced Conceptual Engineering Drawings, and this Final EIR's Appendix B, Select Advanced Conceptual Engineering Drawings - Locally Preferred Alternative, at Prairie Avenue.

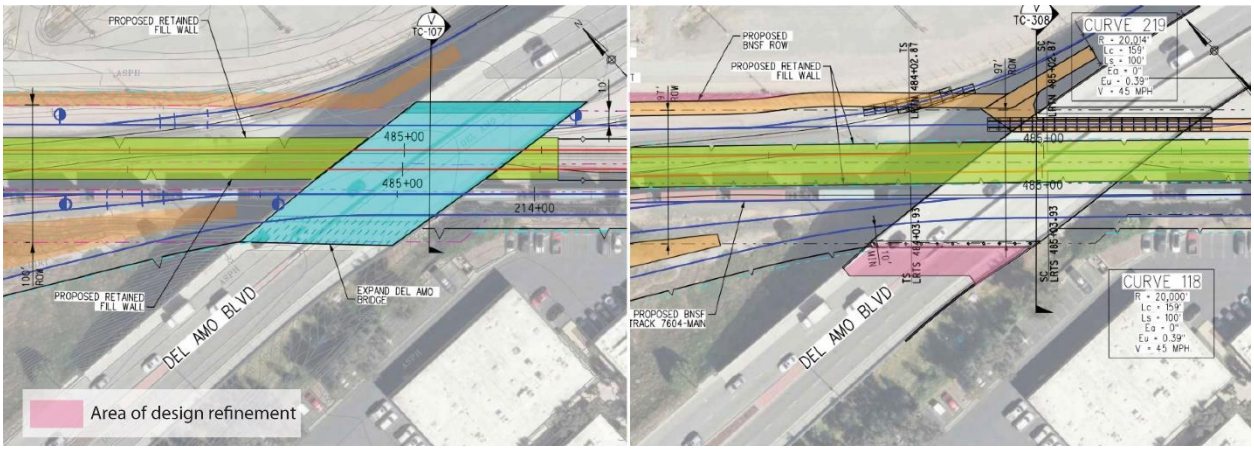
Figure 3.4-9. Prairie Avenue in Draft EIR ACE (left) and Final EIR ACE (right)



Source: STV, 2023; 2025

Analysis in the Draft EIR included demolition and replacement of the bridge deck at Del Amo Boulevard and expansion of the bridge using its existing abutments to accommodate shifting tracks. The proposed design refinement would require the demolition and replacement of the bridge deck and the west abutment to widen the ROW and accommodate the shifting freight tracks. Figure 3.4-10 compares the Draft EIR's Appendix 2-A, Select Advanced Conceptual Engineering Drawings, and this Final EIR's Appendix B, Select Advanced Conceptual Engineering Drawings - Locally Preferred Alternative, at Del Amo Boulevard.

Figure 3.4-10. Del Amo Boulevard in Draft EIR ACE (left) and Final EIR ACE (right)



Source: STV, 2023; 2025

Construction of the refined structures at Prairie Avenue and Del Amo Boulevard would use the same methods described in the Draft EIR for other parts along the Metro ROW. The box tunnel at Prairie Avenue is proposed to be cast-in-place and would be constructed by excavating a trench and lining it with concrete, using techniques similar to those proposed for the short trench segments at 170th Street and 182nd Street. At Del Amo Boulevard, the project would continue to require demolition and reconstruction of the bridge deck, as described in the Draft EIR, but the refined design would also require demolition and reconstruction of the west abutment in order to accommodate the larger bridge deck. These activities are similar to the construction of the supports for other elevated structures proposed as part of the project.

3.4-4.1 Transportation

While analysis in the Draft EIR assumed the potential for closures of Prairie Avenue during construction and definite closures of Del Amo Boulevard during construction, the larger scale, albeit similar type, of construction would likely result in longer closures than those assumed under the design analyzed in the Draft EIR. These bridge refinements would not extend the overall schedule of the LPA analyzed in Chapter 4 of the Draft EIR, but they would likely require slightly longer durations of work at these two locations. Project Feature PF-T-1, Construction Traffic Management Plan, remains part of the project with the proposed refinements. Because PF-T-1 is part of the project, and the CTMP would address construction-phase access and coordination, the potential for longer closures at these locations does not alter the conclusions regarding transportation impacts during construction.

The proposed bridge refinements would not alter the permanent conditions of transit, roadway, bicycle, and pedestrian facilities on Prairie Avenue or Del Amo Boulevard in a manner that would affect their routine use any differently than that described in the Draft EIR, nor would they alter the project's VMT reduction. The permanent differences resulting from the refinements would largely affect the structures supporting the roadways, not the configuration of their surfaces or how they would be used by the traveling public. Because the proposed bridge refinements do not alter the nature of the fully grade-separated light rail and maintain the existing roadway network, there would be no effect on emergency access.

The impact conclusions for the proposed bridge refinements remain consistent with Section 3.1, Transportation, of the Draft EIR and Section 4.5 of Chapter 4, Corrections and Additions, of this Final EIR.

3.4-4.2 Land Use and Planning

The areas around Prairie Avenue and Del Amo Boulevard are zoned entirely industrial, though there are some commercial and institutional uses also present. Because Project Feature PF-T-1, which includes preparation of a CTMP, remains part of the project, access to these uses would continue to be maintained during the longer construction durations. The operational condition of the roadways would be nearly identical to what is proposed in the Draft EIR. Therefore, the refined bridges would not change the existing land use setting or conflict with plans and policies described in the Draft EIR during operation. The impact conclusions for the proposed bridge refinements remain consistent with Section 3.2, Land Use and Planning, of the Draft EIR and Section 4.6 of Chapter 4, Corrections and Additions, of this Final EIR.

3.4-4.3 Visual and Aesthetics

The proposed bridge refinements are located immediately adjacent to the Metro ROW, and the Draft EIR establishes that there are no scenic vistas or state scenic highways in the RSA. While construction durations at these locations could be longer than those proposed in the Draft EIR, the surrounding area is heavily industrial, and construction activities would not substantially degrade the visual quality of the immediate area. Visual changes from construction activities would be temporary, and construction elements such as equipment, stockpiles, and fencing would be removed once construction is completed. Because the permanent condition of the bridges would remain relatively the same size and in the same location as that described in the Draft EIR, their operational condition would be nearly identical to what is proposed in the Draft EIR. Therefore, the refined bridges do not change the visual conditions analyzed in the Draft EIR. The impact conclusions for the refinements remain consistent with Section 3.3, Visual and Aesthetics, of the Draft EIR and Section 4.7 of Chapter 4, Corrections and Additions, of this Final EIR.

3.4-4.4 Air Quality

The proposed refinements to the structures under Del Amo Boulevard and Prairie Avenue could represent a marginal increase in construction, but not to the extent that overall construction durations would be altered or maximum daily emissions of the LPA would exceed the thresholds described in the Draft EIR. While the refinement at Prairie Avenue requires construction similar to trenching, the amount of trenching would be substantially less than what would be required for the Trench Option, even when considered in combination with other trenching work required for the LPA, as discussed below.

These proposed bridge refinements were considered in the construction durations described in Chapter 2, Description of the Locally Preferred Alternative, and included in the analysis in Section 4.21 of Chapter 4, Corrections and Additions, of this Final EIR. The refined design includes a box tunnel at Prairie Avenue, which would involve trenching-like construction. This is in addition to the trenching that was already part of the LPA at 170th and 182nd Street. To assess the air quality impacts of these limited trench segments, the analysis utilized a scaling approach based on the more extensive trenching included in the Trench Option. The Trench Option would involve continuous trenching over a much longer segment of the alignment and was found to result in a significant and unavoidable air quality impact during construction due to the high truck volumes associated with the excavation and fill material hauling. By comparison, the trenching in the LPA—including the refined box tunnel at Prairie Avenue—is limited in extent. To estimate emissions conservatively, the analysis scaled down from the Trench Option's truck activity. The Trench Option was estimated to require up to 243 daily truckloads (486 one-way truck trips), resulting in approximately 89.4 pounds per day of nitrogen oxide (NO_X) emissions. In contrast, it is estimated that the LPA with the refinements would require a maximum of 172 daily truckloads (344 one-way truck trips) generating approximately 63.3 pounds per day of NO_X emissions. When combined with the other concurrent sources of construction emissions, the total maximum daily NO_X emissions

would be approximately 84.2 pounds per day—which is below the South Coast Air Quality Management District (SCAQMD) threshold of 100 pounds per day. All other emissions would remain below the corresponding SCAQMD screening thresholds.

Operational emissions would remain identical to what was analyzed in the Draft EIR, as the bridge refinements do not alter the alignment or fuel source of the project. The impact conclusions for the bridge refinements remain consistent with Section 3.4, Air Quality, of the Draft EIR and Section 4.8 and Section 4.21 of Chapter 4, Corrections and Additions, of this Final EIR.

3.4-4.5 Greenhouse Gas Emissions

Because the proposed bridge refinements would increase construction duration and intensity at Prairie Avenue and Del Amo Boulevard, a corresponding increase in greenhouse gas emissions could be expected. The construction methods would be the same as those described in the Draft EIR and less intensive than the Trench Option, which was found not result in a significant impact for greenhouse gas emissions during construction. Therefore, the greenhouse gas emissions associated with the proposed bridge refinements would remain within the range disclosed in the Draft EIR.

Operational emissions would remain identical to those analyzed in the Draft EIR, as the refined bridges do not alter the alignment or fuel source of the project. The impact conclusions for the proposed bridge refinements remain consistent with Section 3.5, Greenhouse Gas Emissions, of the Draft EIR and Section 4.9 of Chapter 4, Corrections and Additions, of this Final EIR.

3.4-4.6 Noise and Vibration

Construction and operation of proposed bridge refinements at Prairie Avenue and Del Amo Boulevard have the potential to alter ambient noise levels. However, as shown in Figure 4.21-4 and Figure 4.21-5 in Chapter 4, Corrections and Additions, of the Final EIR, there are no sensitive receptors in the vicinity and the refinements, and the refinements would not move the railroad ROW any closer to sensitive receptors.

The mitigation measures identified in the Draft EIR remain applicable. Therefore, the proposed refinements at the Prairie Avenue and Del Amo Boulevard bridges would not result in the exceedance of FTA noise standards during operation, nor would they increase the already identified significant construction noise impact (which occurs in another area of the alignment).

With regard to vibration, Figure 4.21-29, Figure 4.21-32, and Figure 4.21-33 in Chapter 4 of this Final EIR show the location of receptors potentially affected by vibration. None of these figures identify vibration-sensitive receptors within the impact range of the proposed bridge refinements. The impact conclusions for the refinements remain consistent with Section 3.6, Noise and Vibration, of the Draft EIR and Section 4.10 of Chapter 4, Corrections and Additions, of this Final EIR.

3.4-4.7 Biological Resources

As described in Section 3.4-4, the construction methods used for the proposed refinements at the Prairie Avenue and Del Amo Boulevard bridges are similar to those employed elsewhere along the project alignment. These refinements would occur in the same general location evaluated in the Draft EIR Sections 3.7 and 4.5-3.7 and Section 4.11 of this Final EIR. While these existing bridges could serve as habitat for special-status birds or bats, Mitigation Measures MM-BIO-1, MM-BIO-2, MM-BIO-3, and MM-BIO-4 remain applicable to the proposed refinements. With implementation of these measures, impacts to special-status plants, wildlife, and other birds protected under the Migratory Bird Treaty Act and California Fish and Game Code, would remain less than significant.

The same types of operational maintenance described in the Draft EIR would occur at Prairie Avenue and Del Amo Boulevard. Routine maintenance activities along the project alignment during project operation would be limited in scope and would not typically involve vegetation removal or tree trimming that could affect nesting habitat. In the rare event that such work is required during the nesting season, it would be performed in compliance with applicable rules and regulations enforced by CDFW, including those protecting nesting birds under the California Fish and Game Code. Maintenance work would be scheduled and carried out in a manner that avoids disruption to active nests, consistent with CDFW guidance. The impact conclusions for the refinements remain consistent with Section 3.7, Biological Resources, of the Draft EIR and Section 4.11 of Chapter 4, Corrections and Additions, of this Final EIR.

3.4-4.8 Geology and Soils

(a) Exposure of People or Structures to Adverse Effects

The bridge refinements would remain outside any known fault zones and CGS-mapped AP Earthquake Fault Zone. Therefore, construction and operation of the bridge refinements would result in no impact related to fault rupture.

While the construction durations at Prairie Avenue and Del Amo Boulevard would be slightly longer than the durations assumed in the Draft EIR, the same design approach to accommodate the high seismic ground motion and associated consequences (such as liquefaction-induced vertical settlements or lateral spreading), if any, would apply. These refined structures would not require construction methods beyond those not already considered for the project and would perform in accordance with the MRDC MDE and ODE thresholds during operations. For these reasons, impacts related to strong seismic ground shaking, seismic-related ground failure (including liquefaction), and landslides would remain consistent with the Draft EIR.

(b) Soil Erosion

As described in Section 3.4-4, the construction methods for the proposed Prairie Avenue and Del Amo Boulevard bridge refinements are similar to those that would be employed elsewhere along the alignment and analyzed in the Draft EIR. Therefore, all mitigation measures and project features described in Section 3.8 in the Draft EIR and Section 4.12 of this Final EIR remain valid, as the refinements would not introduce new types of features and occur in soils already analyzed.

(c) Unstable Geological Unit or Soil

The proposed refinements at Prairie Avenue and Del Amo Boulevard are located in the same areas as analyzed in the Draft EIR and are not within a CGS-mapped liquefaction zone. Therefore, impacts associated with unstable soils and their consequences are considered minimal.

(d) Expansive Soils

As the proposed refinements at Prairie Avenue and Del Amo Boulevard are at the same locations as those analyzed in the Draft EIR, the underlying soil conditions are unchanged. Therefore, impacts associated with expansive soils that could pose substantial direct or indirect risks to life or property are considered minimal. Project features described in the Draft EIR Section 3.8 and Section 4.12 of this Final EIR to address expansive soils would remain part of the project and would apply to the refinements.

(e) Disposal of Wastewater

As with the project evaluated in the Draft EIR, the areas affected by the bridge refinements are fully developed with public infrastructure, including sewer lines. Neither construction nor operation of the bridge refinements would require the use of septic tanks or alternative wastewater disposal systems.

(f) Paleontological Resources

The bridge refinements at Prairie Avenue and Del Amo Boulevard would involve ground disturbances in the same areas already analyzed in the Draft EIR. Therefore, Mitigation Measure MM-GEO-1 remains applicable.

The impact conclusions for the proposed refinements at Prairie Avenue and Del Amo Boulevard remain consistent with Section 3.8, Geology and Soils, of the Draft EIR and Section 4.12 of this Final EIR.

3.4-4.9 Hazards and Hazardous Materials

(a) Transport, Use, or Disposal of Hazardous Materials

As previously described, construction of the refinements at Prairie Avenue and Del Amo Boulevard would be in the same location and use the same construction methods as other parts of the Metro ROW evaluated in the Draft EIR. These structures were anticipated by the Draft EIR, and their construction would involve the transport, use, and disposal of hazardous materials similar to those already disclosed. These refinement sites fall within the RSA shown in Figure 3.9-1 of the Draft EIR, which includes locations with potential sources of hazardous materials. Because the types of construction are consistent with those previously analyzed, all project features identified in the Draft EIR would apply to the refinements.

With regard to the potential for encountering and disposing contaminated soil and groundwater, the environmental conditions at Prairie Avenue and Del Amo Boulevard are the same as those assumed for other portions of the Metro ROW and analyzed in the Draft EIR. As such, the project features described in the Draft EIR would remain applicable to the bridge refinements.

As the bridge refinements would not affect operational conditions of the project, they would not change the project's anticipated operational use, storage, or disposal of hazardous materials, as described in the Draft EIR.

(b) Release of Hazardous Materials into the Environment

As described in the Draft EIR, potential hazards that may be encountered within the RSA include oil and gas pipelines, hazardous gases, contaminated groundwater, and buried utilities. Construction of the bridge refinements would involve excavation activities that could encounter these same types of conditions. However, the refinements fall within the affected environment previously reviewed in Draft EIR Section 3.9-3 and analyzed in Section 4.13 of this Final EIR. While the bridge refinements would slightly alter the project footprint at Prairie Avenue and Del Amo Boulevard, they would occur on parcels already evaluated for the presence of hazards and hazardous materials. The project features described in the Draft EIR would be applicable to these locations, and no new conditions are present that would change the conclusions reached in the prior analysis.

(c) Hazardous Materials within One-Quarter Mile of a School

The proposed bridge refinements at Prairie Avenue and Del Amo Boulevard are located in a heavily industrialized area, with a footprint on or directly adjacent to the areas analyzed in the Draft EIR; therefore, their construction and operation would not bring hazardous materials, substances, or waste closer to existing or proposed schools.

Since the proposed bridge refinements are within or immediately adjacent to the original footprint, they would not alter construction hauling routes. The prior analysis regarding potential transport of hazardous materials remains applicable, and project features identified in the Draft EIR would also apply at these locations. The proposed bridge refinements would not change the operational conditions that could lead to the release of hazardous materials within a quarter-mile of existing or proposed schools beyond what was already described in the Draft EIR.

(d) Government Code Section 65962.5

The proposed bridge refinements at Prairie Avenue and Del Amo Boulevard would require a temporary construction easement on the North Posse Site, which is included on the list of hazardous materials sites prepared pursuant to Government Code Section 65962.5. This site is described and analyzed in Section 3.9-4.4 of the Draft EIR. The Draft EIR assumes the use of this site for a temporary construction easement associated with work previously proposed by the project in this area and analyzed it accordingly. Because the nature of the bridge refinements is similar to what was previously considered, the analysis and applicable project features identified in Section 3.9-4.4 remain valid. As described in the Draft EIR, a Phase II site investigation is recommended to evaluate soils and groundwater for TPH, VOC, SVOC, ACM, and metals along the alignment between Prairie Avenue and Del Amo Boulevard.

(e) Airstrips

Like the rest of the project described in the Draft EIR, the proposed bridge refinements are not within or close proximity to an airstrip.

(f) Emergency Response or Evacuation Plan

While construction may extend for a longer duration at Prairie Avenue and Del Amo Boulevard than previously anticipated, Project Feature PF-T-1, which includes preparation of a CTMP, would remain part of the project with the bridge refinements during construction. The CTMP would address emergency access within the RSA. The refinements would not alter how the project interacts with local roadways used by emergency responders during operation or affect evacuation routes or plans beyond what is described in the Draft EIR.

(g) Wildfires

Like the rest of the project described in the Draft EIR, the proposed bridge refinements are located in a highly urbanized area, and no portion of the RSA lies within or close to areas prone to wildfires.

The impact conclusions for the bridge refinements remain consistent with Section 3.9, Hazards and Hazardous Materials, of the Draft EIR and Section 4.13 of Chapter 4, Corrections and Additions, of this Final EIR.

3.4-4.10 Hydrology and Water Quality

Construction of the proposed bridge refinements at Prairie Avenue and Del Amo Boulevard has a similar potential to introduce contamination to surface water or groundwater, or to impact groundwater supplies, as the construction of other major structural work described in the Draft EIR. As previously described, the same construction methods would occur under the same hydrological conditions described in the Draft EIR. The project features described in the Draft EIR are part of the project and would apply to the refinement, consistent with the assumptions underlying the Draft EIR's impact analysis.

The change in impervious surface resulting from the proposed bridge refinements would be negligible, as the refinements would occur on land that is already highly developed and occupied by existing major

bridge structures. Operations associated with the refinements would not change how the project would interact with surface or groundwater resources, relative to what was described in the Draft EIR.

As the bridge refinements occur on or immediately adjacent to the original project footprint, no substantial alterations to drainage patterns would occur during construction relative to those described in the Draft EIR, and the area does not include significant existing natural and manmade drainage features, including sumps. Additionally, the bridge refinements are not located within a designated flood zone. Where excavation is required, the same BMPs identified as part of the project features in the Draft EIR would apply, as they would elsewhere on the project for similar types of infrastructure.

The bridge refinements are subject to the same water quality control plans and sustainable groundwater management plans applicable to the broader project. As such, the impact conclusions related to water supply, groundwater quality, and consistency with applicable plans remain unchanged. The impact conclusions for the bridge refinements remain consistent with Section 3.10, Hydrology and Water Quality, of the Draft EIR and Section 4.14 of Chapter 4, Corrections and Additions, of this Final EIR.

3.4-4.11 Utilities and Service Systems

The proposed bridge refinements at Prairie Avenue and Del Amo Boulevard would interact with water, wastewater treatment, stormwater drainage, electric power, natural gas, and telecommunications facilities in slightly different ways than that described in the Draft EIR due to the refinements' slightly expanded footprint. Nonetheless, the refinements still largely overlap with the previously analyzed project footprint and therefore involve the same utility facilities analyzed in the Draft EIR. The proposed bridge refinements involve the same types of construction as would be used elsewhere in the Metro ROW described in the Draft EIR, thus requiring only minimal wastewater use and the same types of modifications to storm drain infrastructure. Electricity requirements during project operations would not change with the proposed bridge refinements and the analysis in Section 3.11-4 remains valid. The bridge refinements would not expand the RSA into areas with publicly owned oil facilities, and would not introduce natural gas or oil use into project operations.

The refinements would also leave consumption of potable water, wastewater generation, and solid waste production during both construction and operation within the ranges analyzed in the Draft EIR. The slight change in the footprint does not alter the overall scope and intensity of these activities.

Project features described in the Draft EIR would continue to apply to the bridge refinements and support the conclusion that utility-related impacts would remain below the significance thresholds during construction and operation. The impact conclusions for the bridge refinements remain consistent with Section 3.11, Utilities and Service Systems, of the Draft EIR and Section 4.15 of Chapter 4, Corrections and Additions, of this Final EIR.

3.4-4.12 Energy

Like air quality and greenhouse gas emissions, the proposed bridges at Prairie Avenue and Del Amo Boulevard would involve similar types of structures and construction methods as those proposed elsewhere along the Metro ROW. These refinements would not require substantially more or different energy sources than those disclosed in the Draft EIR. Operational energy use would remain identical to what was analyzed in the Draft EIR, as the refined bridge designs do not alter the alignment or fuel source of the project. The impact conclusions for the proposed bridge refinements remain consistent with Section 3.12, Energy, of the Draft EIR and Section 4.16 of Chapter 4, Corrections and Additions, of this Final EIR.

3.4-4.13 Cultural Resources

As the location of the proposed bridge refinements at Prairie Avenue and Del Amo Boulevard is the same as analyzed in the Draft EIR, the RSA described in Section 3.13 of the Draft EIR encompasses this area and does not include built environment resources that meet the NRHP/CRHR criteria for eligibility or that are considered historical resources for the purposes of CEQA.

As construction methods, location, and duration of the refinements would be similar to those proposed elsewhere in the Metro ROW and would occur in an area already identified for disturbances in the Draft EIR, there would be a similarly limited potential to encounter intact archaeological resources, due to prior disturbance of the area. The provisions for treatment of human burials, as described in the Draft EIR, would apply to the bridge refinements. Additionally, the bridge refinements are not located near El Nido Park.

Mitigation Measures MM-CUL-1, MM-CUL-2, and MM-CUL-3, as described in Section 4.17 of this Final EIR, would still be applicable to constructing the bridge refinements. Operational conditions would be the same as those described in the Draft EIR. The impact conclusions for the bridge refinements remain unchanged from what is described in the Draft EIR. The impact conclusions for the proposed bridge refinements remain consistent with Section 3.13, Cultural Resources, of the Draft EIR and Section 4.17 of Chapter 4, Corrections and Additions, of this Final EIR.

3.4-4.14 Tribal Cultural Resources

As construction methods, location, and duration of the proposed bridge refinements would be the same as for other project components proposed along the Metro ROW, and would occur in an area already proposed for disturbances in the Draft EIR, there would be a similarly limited potential to encounter intact tribal cultural resources, due to prior disturbance of the area.

The proposed refinements do not expand the RSA to areas that encompass resources that have been determined by Metro, in its discretion and supported by substantial evidence, to be significant tribal cultural resources. As described in the Draft EIR, excavations associated with construction have the potential to disturb and destroy previously unknown significant tribal cultural resources. Mitigation Measures MM-TCR-1, MM-TCR-2, and MM-TCR-3, as described in Section 4.18 of this Final EIR, would be applicable to address such impacts. Operational conditions would be the same as those described in the Draft EIR.

The impact conclusions for the proposed bridge refinements remain consistent with Section 3.14, Tribal Cultural Resources, of the Draft EIR and Section 4.18 of Chapter 4, Corrections and Additions, of this Final EIR.

3.4-4.15 Public Services

As construction location for the bridge refinements at Prairie Avenue and Del Amo Boulevard would remain the same and the construction methods and durations would be similar to those analyzed in the Draft EIR, there remains no need to acquire or alter fire protection facilities, police protection facilities, schools, parks, or libraries. While construction at Prairie Avenue could result in longer closures than previously assumed, Project Feature PF-T-1 would remain part of the project to address emergency access during construction. Given the relatively similar scale and temporary nature of construction, no additional demand on government facilities from temporary workers is anticipated. The proposed bridge refinements would not alter the operations of the project, as the bridges would still span the light rail and freight rail corridors, nor would they change the governmental jurisdiction of any stations.

Because the proposed bridge refinements are in the same location and are of a similar scale to those described in the Draft EIR, they would not change the project's potential to increase or accelerate wear on park facilities. The number of construction workers required by the bridge refinements would remain consistent with what was previously analyzed, and the number of riders the project would attract would remain the same.

The impact conclusions for the proposed bridge refinements remain consistent with Section 3.15, Public Services, of the Draft EIR and Section 4.19 of Chapter 4, Corrections and Additions, of this Final EIR.

As described above, the proposed bridge refinements would not result in new or more severe impacts compared to those disclosed in the Draft EIR; therefore, the refinements would not contribute to cumulative impacts in a manner that would be cumulatively considerable compared to the project as originally proposed.

3.4-5 Alternate Construction Staging Site

After the publication of the Draft EIR and further coordination with the City of Torrance, Metro proposed to relocate a construction staging area from the Torrance Transit Center parking lot to a nearby vacant lot also owned by the City of Torrance. The proposed site is immediately adjacent to the parking lot, as shown in Figure 3.4-11. Since the publication of the Draft EIR, the Torrance Transit Center has opened, and the parking lot is now operational. The imagery on the left in Figure 3.4-11 (outlined in red) is the same location as the parking lot shown in the updated imagery on the right.

Due to the proximity of the new site and the fact that its proposed use is identical to that analyzed in the Draft EIR, the environmental review of this refinement is presented collectively, rather than subdivided into individual topic sections, in order to avoid repetition.

Figure 3.4-11. Torrance Transit Center Area Construction Staging in Draft EIR (left) and Final EIR (right)



Source: STV, 2023; 2025

This new construction staging location would serve the same function as the site previously proposed at the Torrance Transit Center parking lot in the Draft EIR and would be accessed using the same routes. Because of this, the analysis and conclusions regarding transportation, land use, visual and aesthetics, air quality, greenhouse gas emissions, energy, and public services remain consistent with those presented for the original site in the Draft EIR.

While the proposed staging area is approximately five feet closer to noise- and vibration-sensitive receptors, these receptors are over 760 feet from the southern boundary of the staging area, across Crenshaw Boulevard, a heavily trafficked arterial roadway. Moreover, construction staging activities, such as equipment storage, organization, and field offices, typically do not involve intensive noise- or vibration-generating work. Therefore, noise and vibration impacts from the revised staging site would be similar to those evaluated in the Draft EIR and no new or substantially more severe impact would occur.

Biological resources, geology and soils, hazards and hazardous materials, hydrology and water quality, utilities, cultural resources, and tribal cultural resources are highly location-specific in nature. The alternative staging site is directly adjacent to the Torrance Transit Center and is owned by the City of Torrance. As such, it was included in the RSA for each of these topics and analyzed accordingly the Draft EIR. The applicable project features and mitigation measures would continue to apply to construction activities at this site.

As this site would be used solely for construction staging and would not be part of long-term operations, it would not result in any operational changes to the project. Therefore, the environmental impacts associated with operations would remain unchanged from those disclosed in the Draft EIR.

The proposed alternate construction staging site would not result in new or more severe impacts compared to those disclosed in the Draft EIR; therefore, this refinement would not contribute to cumulative impacts in a manner that would be cumulatively considerable compared to the project as originally proposed.

3.4-6 Torrance Transit Center Pedestrian Path

Following continued coordination with the City of Torrance after publication of the Draft EIR, the City expressed concerns that the proposed pedestrian path from the light rail platform to the bus bays and continuing to Crenshaw Boulevard could encourage patrons to cross Crenshaw Boulevard at undesignated locations. In response, Metro refined the design by truncating the station path, retaining the segment between the light rail platform and the bus bay, but removing the extension to Crenshaw Boulevard. While this represents an alteration in pedestrian circulation relative to what was proposed in the Draft EIR, safe pedestrian access between the existing bus plaza and the proposed station platform would remain.

This refinement represents the removal of a project element rather than an addition or relocation of one. Because of this, it is expected to reduce construction activities slightly and would generally result in fewer potential environmental impacts.

The only areas where the truncation of the pedestrian path could introduce greater or new impacts are transportation, and, indirectly, air quality, greenhouse gas emissions, and energy. However, the removed segment is less than 500 feet in length, and other pedestrian access routes to Crenshaw Boulevard from the Torrance Transit Center exist currently. Therefore, the refinement would not impact circulation in a way that would increase VMT or create geometric hazards. Without changes to VMT, there would be no related changes in air quality, greenhouse gas emissions, or energy use.

Therefore, all environmental effects associated with this design refinement would be similar to those disclosed in the Draft EIR, and no new or more severe impacts would occur. This refinement would not contribute to cumulative impacts in a manner that would be cumulatively considerable compared to the project as originally proposed.

4 CORRECTIONS AND ADDITIONS

4.1 INTRODUCTION

This chapter presents the corrections and additions to the Draft EIR. This chapter addresses specific subject matter in the Draft EIR that has been corrected or added. The changes are symbolized by strikeouts where text was removed and italicized/underlined where text was added. Pursuant to Public Resources Code Section 21092.1 and CEQA Guidelines Section 15088.5, these changes do not constitute "significant information" that would require recirculation of the Draft EIR. These revisions do not disclose a new significant and unavoidable environmental impact, a substantial increase in the severity of an unavoidable impact, or identify a new feasible mitigation measure or alternative considerably different from those provided in the Draft EIR, which would considerably lessen a significant impact but that Metro has declined to implement. Rather, the EIR's corrections and additions clarify, amplify, or make insignificant modifications to the Draft EIR.

The Draft EIR was submitted to the State Clearinghouse Office of Planning and Research and circulated for public review from January 26, 2023 to March 27, 2023.

4.2 EXECUTIVE SUMMARY

Page ES-13 – The first paragraph under the Hawthorne Option heading is revised as follows:

> The Hawthorne Option would start within the existing Metro ROW, leave the Metro ROW to parallel I-405 between Inglewood Avenue and Hawthorne Boulevard, and follow Hawthorne Boulevard south between 162nd Street and 190th Street. The entire alignment within the Hawthorne Option segment would be elevated, for approximately 2.7 miles. *Existing overhead transmission lines along the segment would need to be relocated to avoid conflicts with the elevated structure*. South of 190th Street, the alignment and Torrance TC Station would be identical to the Proposed Project. Figure ES-10 shows an overview of the alignment. Example cross-sections are shown in Figure ES-11 and Figure ES-12.

Page ES-20 - The summary in Table ES-2. Summary of Impacts Evaluation is corrected as follows: for air quality item A related to the Trench Option to accurately reflect the analysis in the Draft EIR's Section 3.4; for biological resources items A and E related to all alignments to account for an added mitigation measure; for all cultural resources items to account for revised mitigation measures; and for all tribal cultural resources items to account for added mitigation measure:

Table ES-2. Summary of Impacts Evaluation

Environmental Impact	Proposed Project/Option	Impact Before Mitigation	Proposed Mitigation Measures	Impact After Mitigation
Air Quality				
A. Would the Project conflict with or obstruct implementation of the applicable air quality plan?	Trench Option	***Construction***: ~~Less than~~ ***Significant*** Operations: Less than Significant	None	***Construction***: ~~Less than~~ ***Significant and Unavoidable*** Operations: Less than Significant

Environmental Impact	Proposed Project/Option	Impact Before Mitigation	Proposed Mitigation Measures	Impact After Mitigation
Biological Resources				
A. Would the Project have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?	Proposed Project	**Construction: Significant** **Operations: Significant**	Construction: MM-BIO-1: General Protection Measures to Avoid and Minimize Impacts on Sensitive Biological Resources MM-BIO-2: Nesting Bird Season Restrictions and Pre-Construction Surveys MM-BIO-3: Roosting Bat Restrictions and Survey Requirements MM-BIO-4: Pre-construction Rare Plant Survey Operations: MM-BIO-1: General Protection Measures to Avoid and Minimize Impacts on Sensitive Biological Resources *MM-BIO-5: Off-site Mitigation for Southern Tarplant Habitat*	Construction: Less than Significant Operations: Less than Significant

Environmental Impact	Proposed Project/Option	Impact Before Mitigation	Proposed Mitigation Measures	Impact After Mitigation
Biological Resources				
	Trench Option	**Construction: Significant** **Operations: Significant**	Construction: MM-BIO-1: General Protection Measures to Avoid and Minimize Impacts on Sensitive Biological Resources MM-BIO-2: Nesting Bird Season Restrictions and Pre-Construction Surveys MM-BIO-3: Roosting Bat Restrictions and Survey Requirements MM-BIO-4: Pre-construction Rare Plant Survey Operations: MM-BIO-1: General Protection Measures to Avoid and Minimize Impacts on Sensitive Biological Resources *MM-BIO-5: Off-site Mitigation for Southern Tarplant Habitat*	Construction: Less than Significant Operations: Less than Significant

Environmental Impact	Proposed Project/Option	Impact Before Mitigation	Proposed Mitigation Measures	Impact After Mitigation
Biological Resources				
	Hawthorne Option	**Construction: Significant** **Operations: Significant**	Construction: MM-BIO-1: General Protection Measures to Avoid and Minimize Impacts on Sensitive Biological Resources MM-BIO-2: Nesting Bird Season Restrictions and Pre-Construction Surveys MM-BIO-3: Roosting Bat Restrictions and Survey Requirements MM-BIO-4: Pre-construction Rare Plant Survey Operations: MM-BIO-1: General Protection Measures to Avoid and Minimize Impacts on Sensitive Biological Resources *MM-BIO-5: Off-site Mitigation for Southern Tarplant Habitat*	Construction: Less than Significant Operations: Less than Significant

Environmental Impact	Proposed Project/Option	Impact Before Mitigation	Proposed Mitigation Measures	Impact After Mitigation
Biological Resources				
E. Would the project conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance	Proposed Project	**Construction**: ~~No Impact~~ ***Significant*** **Operations**: ~~No Impact~~ ***Significant***	*Construction:* *MM-BIO-1: General Protection Measures to Avoid and Minimize Impacts on Sensitive Biological Resources* *MM-BIO-5: Off-site Mitigation for Southern Tarplant Habitat* *Operations:* *MM-BIO-1: General Protection Measures to Avoid and Minimize Impacts on Sensitive Biological Resources* *MM-BIO-5: Off-site Mitigation for Southern Tarplant Habitat*	Construction: ~~No Impact~~ *Less than Significant* Operations: ~~No Impact~~ *Less than Significant*

Environmental Impact	Proposed Project/Option	Impact Before Mitigation	Proposed Mitigation Measures	Impact After Mitigation
Biological Resources				
	Trench Option	**Construction**: ~~No Impact~~ ***Significant*** **Operations**: ~~No Impact~~ ***Significant***	*Construction:* *MM-BIO-1: General Protection Measures to Avoid and Minimize Impacts on Sensitive Biological Resources* *MM-BIO-5: Off-site Mitigation for Southern Tarplant Habitat* *Operations:* *MM-BIO-1: General Protection Measures to Avoid and Minimize Impacts on Sensitive Biological Resources* *MM-BIO-5: Off-site Mitigation for Southern Tarplant Habitat*	Construction: ~~No Impact~~ *Less than Significant* Operations: ~~No Impact~~ *Less than Significant*

Environmental Impact	Proposed Project/Option	Impact Before Mitigation	Proposed Mitigation Measures	Impact After Mitigation
Biological Resources				
	Hawthorne Option	**Construction**: ~~No Impact~~ ***Significant*** **Operations**: ~~No Impact~~ ***Significant***	*Construction:* *MM-BIO-1: General Protection Measures to Avoid and Minimize Impacts on Sensitive Biological Resources* *MM-BIO-5: Off-site Mitigation for Southern Tarplant Habitat* *Operations:* *MM-BIO-1: General Protection Measures to Avoid and Minimize Impacts on Sensitive Biological Resources* *MM-BIO-5: Off-site Mitigation for Southern Tarplant Habitat*	Construction: ~~No Impact~~ *Less than Significant* Operations: ~~No Impact~~ *Less than Significant*

Environmental Impact	Proposed Project/Option	Impact Before Mitigation	Proposed Mitigation Measures	Impact After Mitigation
Cultural Resources				
A. Would the Proposed Project cause a substantial adverse change in the significance of a historical resource pursuant to § 15064.5?	Proposed Project	Construction: No Impact Operations: No Impact	None	Construction: No Impact Operations: No Impact
	Trench Option	Construction: No Impact Operations: No Impact	None	Construction: No Impact Operations: No Impact
	Hawthorne Option	Construction: Less than Significant Operations: Less than Significant	None	Construction: Less than Significant Operations: Less than Significant
B. Would the Project cause a substantial adverse change in the significance of an archaeological resource pursuant to § 15064.5?	Proposed Project	**Construction: Significant** Operations: No Impact	Construction: MM-CUL-1: Cultural Resources Identification Training MM-CUL-2: ~~Archaeologist Consultation~~ *Cultural Resources Monitoring and Mitigation Plan*	Construction: Less than Significant Operations: No Impact
	Trench Option	**Construction: Significant** Operations: No Impact	Construction: MM-CUL-1: Cultural Resources Identification Training MM-CUL-2: ~~Archaeologist Consultation~~ *Cultural Resources Monitoring and Mitigation Plan*~~-~~	Construction: Less than Significant Operations: No Impact
	Hawthorne Option	**Construction: Significant** Operations: No Impact	Construction: MM-CUL-1: Cultural Resources Identification Training MM-CUL-2: ~~Archaeologist Consultation~~ *Cultural Resources Monitoring and Mitigation Plan*	Construction: Less than Significant Operations: No Impact

Environmental Impact	Proposed Project/Option	Impact Before Mitigation	Proposed Mitigation Measures	Impact After Mitigation
Cultural Resources				
C. Would the Project disturb any human remains, including those interred outside of formal cemeteries?	Proposed Project	**Construction: Significant** Operations: No Impact	Construction: MM-CUL-3: Unanticipated Discovery of Human Remains ~~Associated with Known Cemeteries~~	Construction: Less than Significant Operations: No Impact
	Trench Option	**Construction: Significant** Operations: No Impact	Construction: MM-CUL-3: Unanticipated Discovery of Human Remains ~~Associated with Known Cemeteries~~	Construction: Less than Significant Operations: No Impact
	Hawthorne Option	Construction: Less than Significant Operations: No Impact	None	Construction: Less than Significant Operations: No Impact

Environmental Impact	Proposed Project/Option	Impact Before Mitigation	Proposed Mitigation Measures	Impact After Mitigation
Tribal Cultural Resources				
A. Would the Project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k)?	Proposed Project	**Construction: Significant** Operations: Less than Significant	Construction: ~~MM-CUL-1: Cultural Resources Identification Training~~ ~~MM-CUL-2: Archaeologist Consultation~~ ~~MM-CUL-3: Unanticipated Discovery of Human Remains Associated with Known Cemeteries~~ *MM-TCR-1: Native American Monitoring* *MM-TCR-2: Unanticipated Discovery of Tribal Cultural Resource Objects (Non-Funerary/Non-Ceremonial)* *MM-TCR-3: Unanticipated Discovery of Human Remains and Associated Funerary or Ceremonial Objects*	Construction: Less than Significant Operations: Less than Significant

Environmental Impact	Proposed Project/Option	Impact Before Mitigation	Proposed Mitigation Measures	Impact After Mitigation
Tribal Cultural Resources				
	Trench Option	**Construction: Significant** Operations: Less than Significant	Construction: ~~MM-CUL-1: Cultural Resources Identification Training~~ ~~MM-CUL-2: Archaeologist Consultation~~ ~~MM-CUL-3: Unanticipated Discovery of Human Remains Associated with Known Cemeteries~~ *MM-TCR-1: Native American Monitoring* *MM-TCR-2: Unanticipated Discovery of Tribal Cultural Resource Objects (Non-Funerary/Non-Ceremonial)* *MM-TCR-3: Unanticipated Discovery of Human Remains and Associated Funerary or Ceremonial Objects*	Construction: Less than Significant Operations: Less than Significant

Environmental Impact	Proposed Project/Option	Impact Before Mitigation	Proposed Mitigation Measures	Impact After Mitigation
Tribal Cultural Resources				
	Hawthorne Option	**Construction: Significant** Operations: Less than Significant	Construction: ~~MM-CUL-1: Cultural Resources Identification Training~~ ~~MM-CUL-2: Archaeologist Consultation~~ ~~MM-CUL-3: Unanticipated Discovery of Human Remains Associated with Known Cemeteries~~ *MM-TCR-1: Native American Monitoring* *MM-TCR-2: Unanticipated Discovery of Tribal Cultural Resource Objects (Non-Funerary/Non-Ceremonial)* *MM-TCR-3: Unanticipated Discovery of Human Remains and Associated Funerary or Ceremonial Objects*	Construction: Less than Significant Operations: Less than Significant

Environmental Impact	Proposed Project/Option	Impact Before Mitigation	Proposed Mitigation Measures	Impact After Mitigation
Tribal Cultural Resources				
B. Would the Project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is a resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe?	Proposed Project	**Construction: Significant** Operations: Less than Significant	Construction: ~~MM-CUL-1: Cultural Resources Identification Training~~ ~~MM-CUL-2: Archaeologist Consultation~~ ~~MM-CUL-3: Unanticipated Discovery of Human Remains Associated with Known Cemeteries~~ *MM-TCR-1: Native American Monitoring* *MM-TCR-2: Unanticipated Discovery of Tribal Cultural Resource Objects (Non-Funerary/Non-Ceremonial)* *MM-TCR-3: Unanticipated Discovery of Human Remains and Associated Funerary or Ceremonial Objects*	Construction: Less than Significant Operations: Less than Significant

Environmental Impact	Proposed Project/Option	Impact Before Mitigation	Proposed Mitigation Measures	Impact After Mitigation
Tribal Cultural Resources				
	Trench Option	**Construction: Significant** Operations: Less than Significant	Construction: ~~MM-CUL-1: Cultural Resources Identification Training~~ ~~MM-CUL-2: Archaeologist Consultation~~ ~~MM-CUL-3: Unanticipated Discovery of Human Remains Associated with Known Cemeteries~~ *MM-TCR-1: Native American Monitoring* *MM-TCR-2: Unanticipated Discovery of Tribal Cultural Resource Objects (Non-Funerary/Non-Ceremonial)* *MM-TCR-3: Unanticipated Discovery of Human Remains and Associated Funerary or Ceremonial Objects*	Construction: Less than Significant Operations: Less than Significant

Environmental Impact	Proposed Project/Option	Impact Before Mitigation	Proposed Mitigation Measures	Impact After Mitigation
Tribal Cultural Resources				
	Hawthorne Option	**Construction: Significant** Operations: Less than Significant	Construction: ~~MM-CUL-1: Cultural Resources Identification Training~~ ~~MM-CUL-2: Archaeologist Consultation~~ ~~MM-CUL-3: Unanticipated Discovery of Human Remains Associated with Known Cemeteries~~ *MM-TCR-1: Native American Monitoring* *MM-TCR-2: Unanticipated Discovery of Tribal Cultural Resource Objects (Non-Funerary/Non-Ceremonial)* *MM-TCR-3: Unanticipated Discovery of Human Remains and Associated Funerary or Ceremonial Objects*	Construction: Less than Significant Operations: Less than Significant

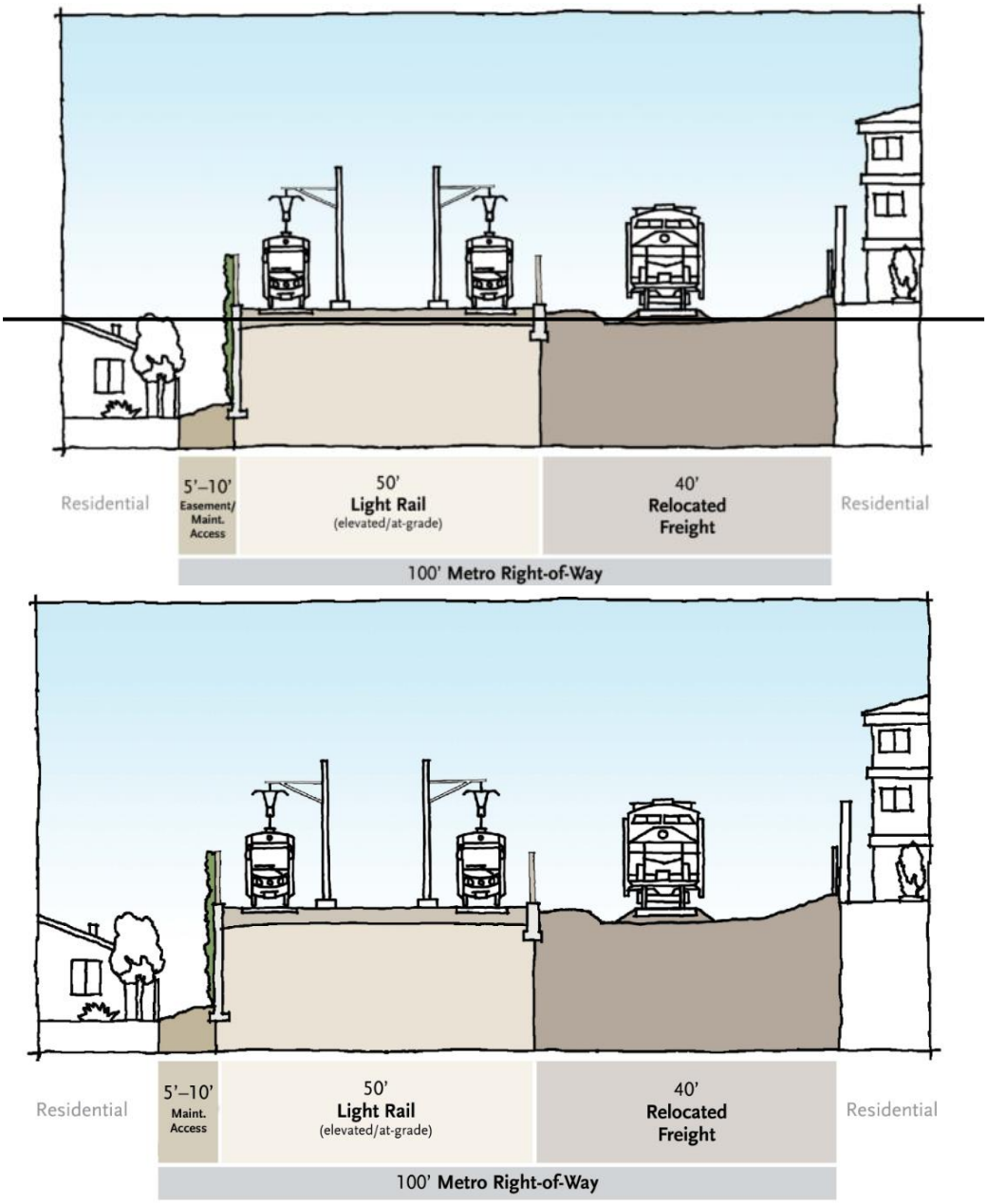
4.3 CHAPTER 2.0 - PROJECT DESCRIPTION

Page 2-4 – The first sentence in the third bullet point under Section 2.1, Project History, is revised as follows:

> **Green Line Extension to Torrance Supplemental Alternatives Analysis (SAA) (2017 to 2018)** – Measure M was passed in November 2016, which provided a source of funding for the Project in addition to the previously allocated funding from Measure R, passed in ~~2009~~ *2008*.

Page 2-11 – The figure and caption of Figure 2.3-6 Proposed Project – Looking South of Artesia Boulevard is replaced as follows:

Figure 2.3-6 Proposed Project – Looking South of Artesia Boulevard <u>near Grant Avenue</u>



Source: Cityworks Design, 202~~2~~5

Dimensions ~~and ROW boundaries~~ are preliminary and subject to confirmation in future phases of design.

Page 2-17 – The text under Section 2.3-1.4 Station Sites is revised as follows:

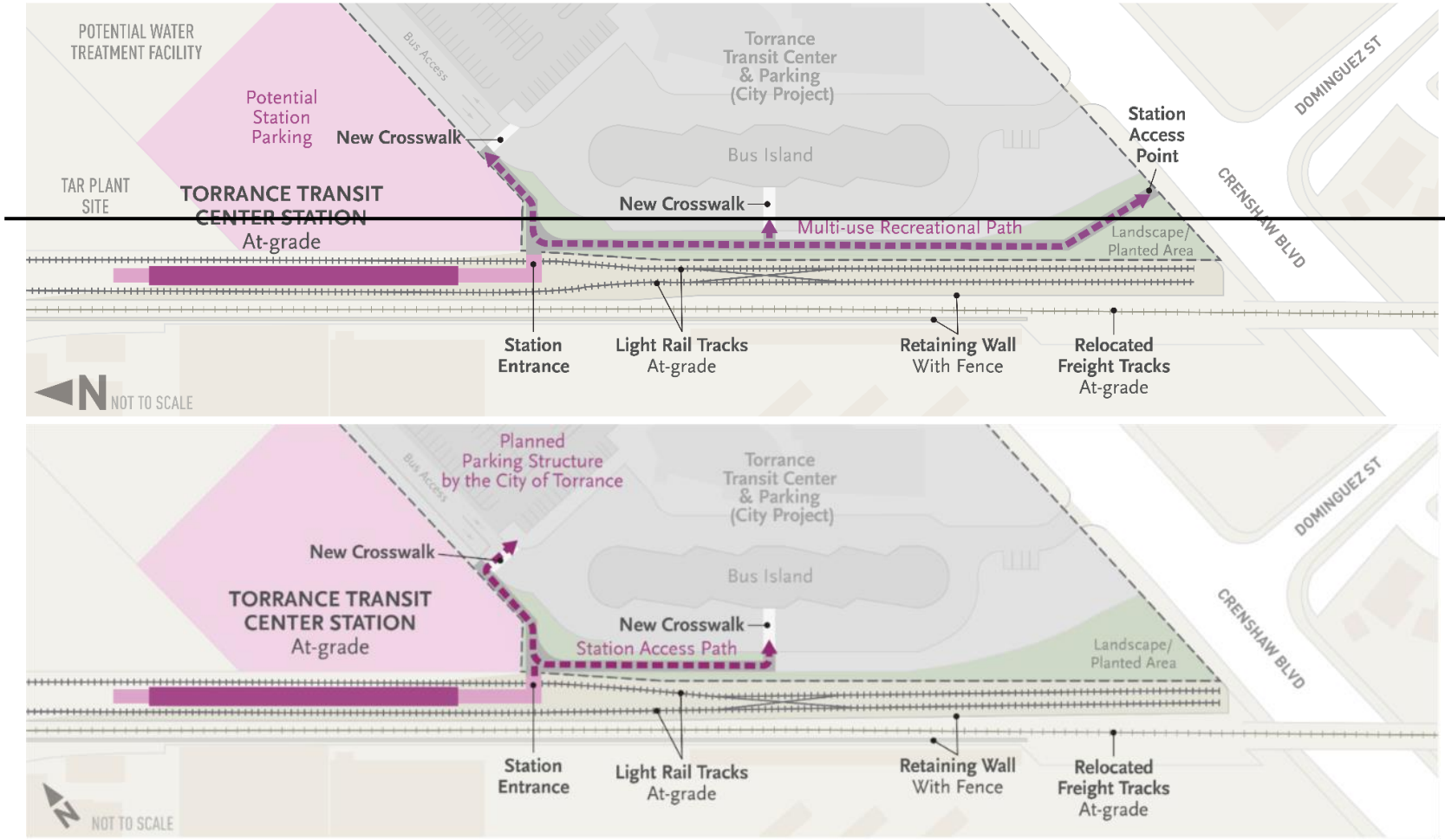
> The Proposed Project includes two new light rail stations. The stations would follow Metro's Systemwide Station Design Standards consistent with the Metro Board<u>'</u>*s* Systemwide Station Design Policy.

Page 2-20 – The text under the Torrance TC Station is revised as follows:

The City of Torrance's regional transit center, the Torrance TC, is located west of Crenshaw Boulevard and east of the Metro ROW. The Proposed Project would include an at-grade light rail station adjacent to the city's transit center, slightly north of the bus plaza (shown in Figure 2.3-14). ~~The Proposed Project station would also include a surface parking lot with approximately 180 spaces, north of the city transit center's parking area.~~ *The City of Torrance is currently proposing to construct a parking structure at the Torrance TC. As it is a separate project by the City, Metro will continue to coordinate with the City as both projects progress.* The light rail station platform would be accessible by pedestrian pathways and crosswalks from the Torrance TC bus plaza and parking areas~~, and as well as a path from Crenshaw Boulevard~~. This would be the southern terminus station for the Proposed Project.

Page 2-20 – Figure 2.3-13 Proposed Project – Torrance Station Layout is replaced as follows, consistent with the truncating of the station access path:

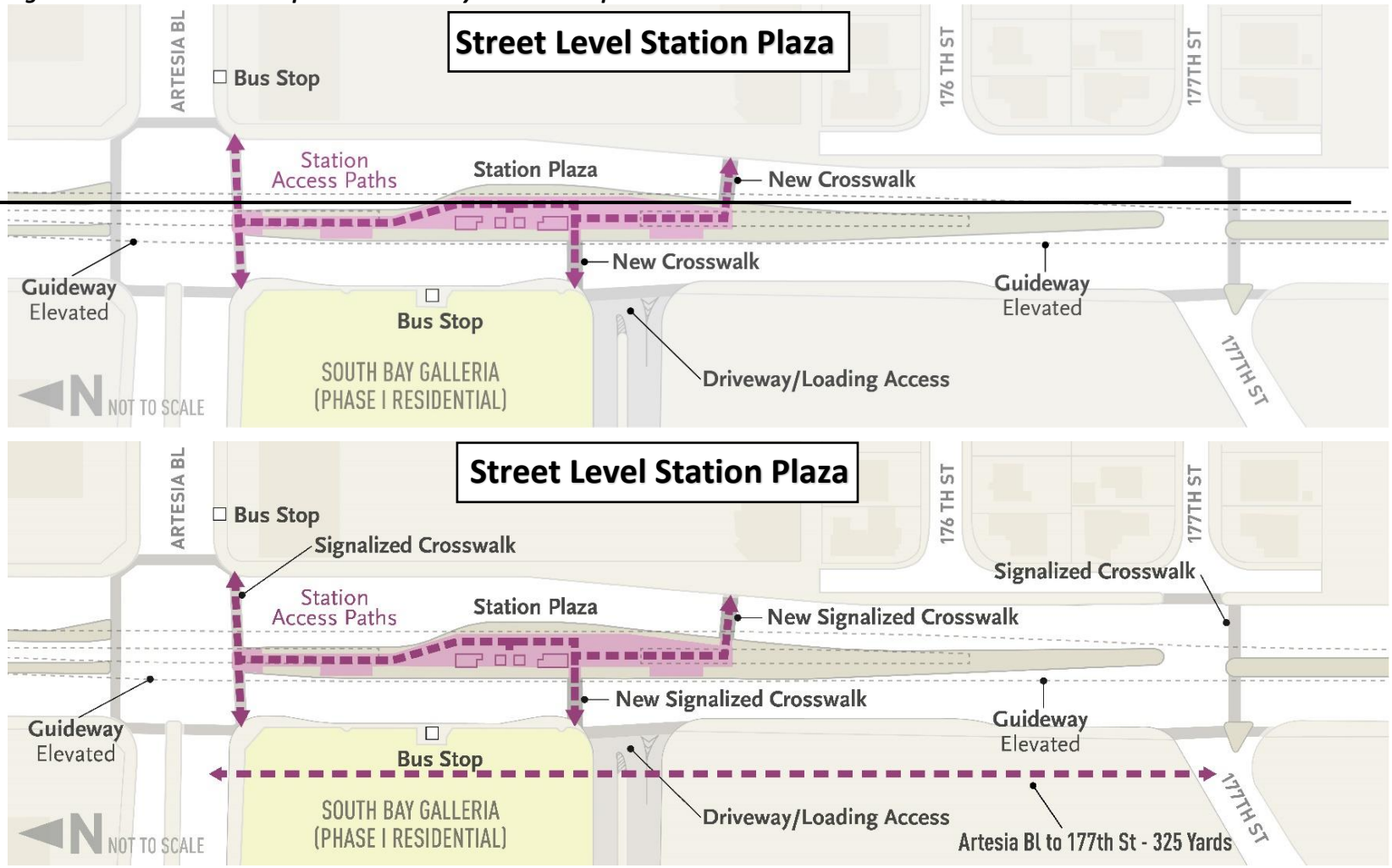
Figure 2.3-13 Proposed Project – Torrance TC Station Layout



Source: Cityworks Design, 2022~~2~~5
Not to Scale

Page 2-40 –Figure 2.3-29 Hawthorne Option – South Bay Galleria Proposed Station Layout is replaced as follows to label new signalized crosswalks:

Figure 2.3-29. Hawthorne Option – South Bay Galleria Proposed Station



Source: Cityworks Design, 2022~~5~~5
Not to Scale

Page 2-43 – Section 2.3-4.3 Maintenance Facility is revised as follows:

> The LPA would not include a new or modified maintenance facility. The light rail vehicles would be serviced, maintained, and stored at the existing Division 16 Southwestern Yard~~, located~~ in the City of ~~El Segundo~~ *Los Angeles or the existing El Segundo Yard Division 22 in the City of Hawthorne*.

Page 2-43 – Section 2.3-3.3 Ancillary Facilities and Support Facilities is revised as follows:

> Multiple additional elements are required to support light rail vehicle operations, including an overhead ~~catenary~~ *contact* system (OCS), traction power substations (TPSS), and communications and signaling buildings. *The light rail system components would adhere to the Metro Rail Design Criteria and would use a similar design as existing Metro light rail lines. At the Redondo Beach (Marine) Station, the project would tie into the existing systems infrastructure of the Metro C/K Line.*

Page 2-47 – Section 2.3-4.4.3 Communications and Signaling Buildings is revised as follows:

> Communications and signaling buildings contain train control and communications equipment. They would be located at each station. These facilities are typically constructed as enclosures either underneath the station platforms or as small stand-alone structures along the guideway away from major pedestrian access*; however, the project would not include such facilities underneath station platforms*. The communications buildings would require approximately 500 square feet area and signaling buildings would require approximately 100 square feet. Figure 2.3-35 shows an example of a train communications and signaling building.

Page 2-49 – The Railroad/Light Rail Track text is revised as follows:

> **Railroad/Light Rail Track** – Construction activities for at-grade light rail track would include preparation of the track bed and installation of the supporting base, followed by installation of the rails and ties. Rails would be flash-butt *and thermite* welded either on site or in a nearby staging yard. On-track regulators and tampers would be utilized to set and align the tracks, with grinders used to adjust the rail heads to match train wheel profiles. For elevated guideways, the light rail track would be installed via direct fixation (i.e., rail fastened directly to a bridge superstructure). Construction activities for the relocated BNSF tracks would be coordinated with BNSF.

Page 2-56 – Section 2.5 Project Features is revised to include the following:

> *Biology*

- *PF-BIO-1. Metro Tree Policy*

> *Public Services*

- *PF-PS-1: Coordination with Torrance Refining Company and Emergency Responders*

Page 2-58 – The first row of Table 2.6-1 Permits and Approvals is revised as follows:

Table 2.6-1. Permits and Approvals

Agency/Jurisdiction		Permit/Approval Required
State	California Department of Transportation	~~Permit a~~*A*pprovals for ~~encroachment on~~ *modifications to* Caltrans ~~ROW~~ *lease agreement* (~~I-405 and Hawthorne Boulevard for Hawthorne Option,~~ Artesia Boulevard and Hawthorne Boulevard bridge~~s~~ for Proposed Project and Trench Option, *or encroachment onto Caltrans ROW (I-405 and Hawthorne Boulevard for Hawthorne Option).*

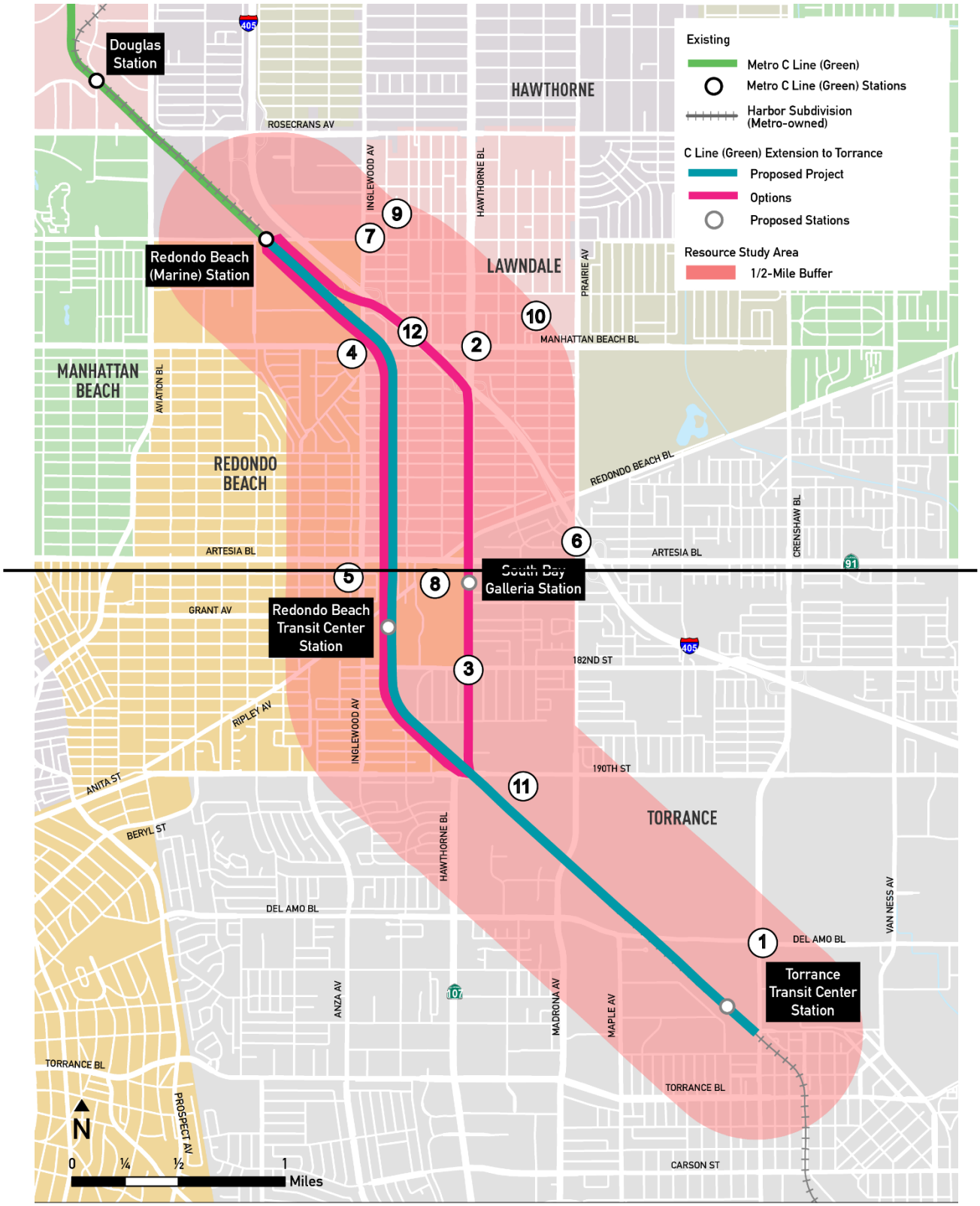
4.4 CHAPTER 3.0 - INTRODUCTION

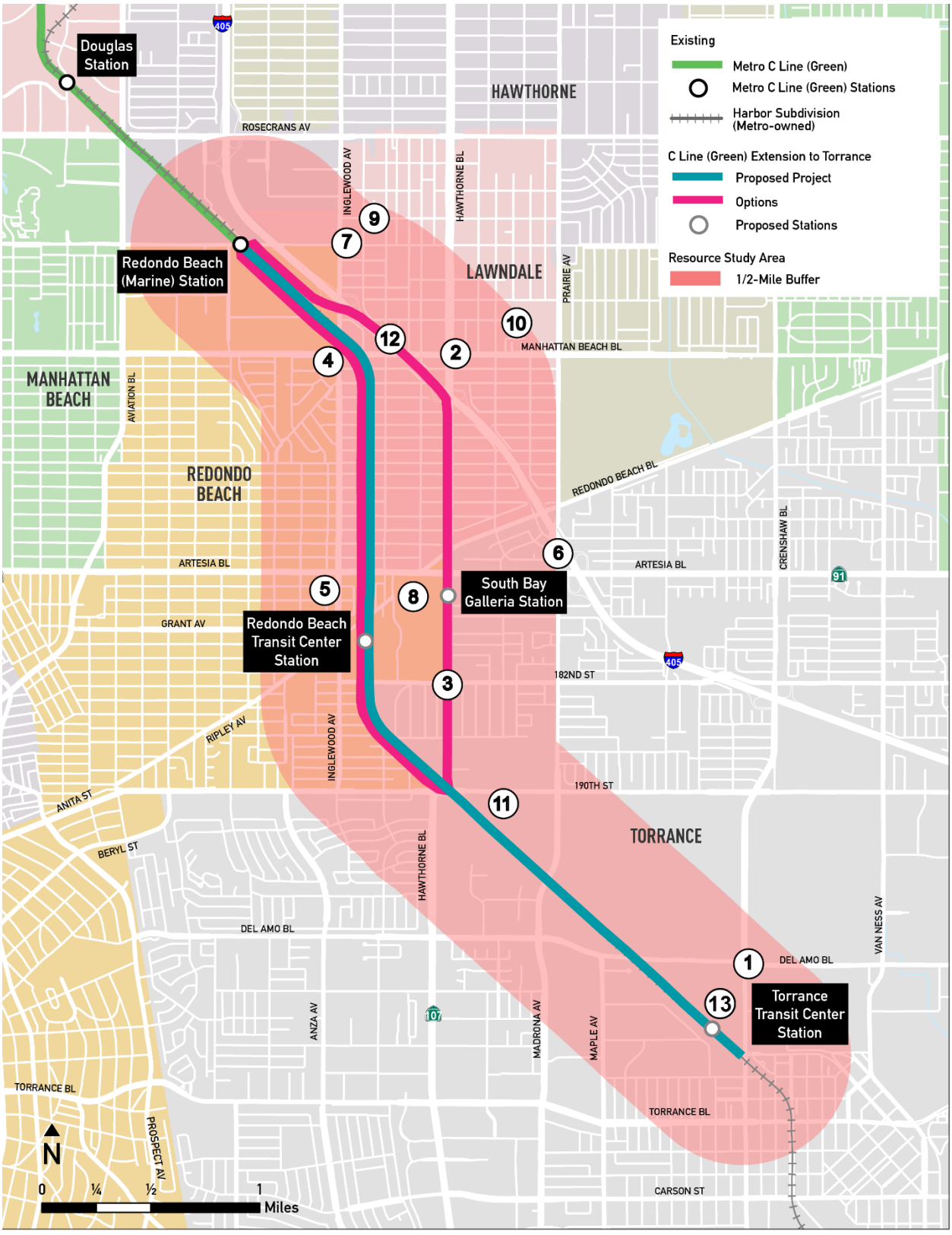
Page 3-2 – The third paragraph of Section 3.0-2 Cumulative Analysis Methodology is revised as follows:

> This Draft EIR utilizes both approaches. For regional cumulative impacts, the cumulative analysis incorporates regional projections from the Southern California Association of Governments (SCAG) 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS). The RTP/SCS reflects transportation, population, employment, and land use data for the six-county SCAG area through the year 2045.
>
> *Since the release of the Draft EIR, SCAG has adopted the 2024–2050 RTP/SCS, Connect SoCal 2024. The guiding policies, strategies, and regional planning assumptions in Connect SoCal 2024 are materially similar to those in the prior 2020-2045 RTP/SCS and continue to support development of high-capacity transit infrastructure such as the Proposed Project. Therefore, the Proposed Project remains consistent with the RTP/SCS, including Connect SoCal 2024's emphasis on expanding transit and reducing vehicle miles traveled (VMT), and supporting compact, infill development.*
>
> *The travel demand modeling and growth forecasts used in the Draft EIR to reflect incremental population and employment growth in the study area and surrounding region remain valid for evaluating cumulative impacts. The differences between the two RTP/SCS documents are not substantial enough to alter the environmental conclusions of the Draft EIR. Accordingly, an updated analysis using Connect SoCal 2024 as the basis for cumulative conditions is not required, as the results and findings would not be substantially different than what is presented in the Draft EIR.*
>
> For more site-specific or localized cumulative impacts, the analysis is based on a list of probable future projects within a half-mile of the alignments, listed in Table 3.0-1 and depicted in Figure 3.0-1. The cumulative analysis for each environmental resource is included in the individual sections in Chapter 3.

Page 3-3 – Figure 3.0-1. Cumulative Projects Within Half-Mile of the Proposed Alignments is revised to include cumulative project 13:

Figure 3.0-1. Cumulative Projects Within Half-Mile of the Proposed Alignments





Source: STV, 2022~~1~~5

Page 3-4 - Table 3.0-1 Cumulative Projects within Half-Mile of the Proposed Alignments is revised as follows to update respective project status:

Table 3.0-1. Cumulative Projects Within Half-Mile of the Proposed Alignments

Map #	Status	Project Type	Project Name	Project Description	Project Location	Project City
1	~~Pre-Construction~~ *Construction*	Road	Crenshaw Boulevard Intersection Improvements	Addition of dedicated right-turn lane for southbound lane	Crenshaw Blvd between Del Amo Blvd and the Torrance TC entrance	Torrance
4	~~Planning~~ *Completed*	Road	Inglewood Avenue Intersection Improvements	Construction of a right turn only lane	Inglewood Ave at Manhattan Beach Blvd	Redondo Beach
11	~~Pre-construction~~ *Completed*	Industrial	Torrance Industrial Exchange	428,020 sq. ft. warehouse/industrial complex	19201 Prairie Ave	Torrance
13	*Planning*	*Parking Garage*	*Mary K. Giordano Regional Transit Center Parking Structure*	*Parking structure with up to 4 levels and 1,000 stalls with electrical vehicle charging stations*	*465 Crenshaw Blvd. Torrance, CA 9050*	*Torrance*

4.5 CHAPTER 3.1 - TRANSPORTATION

Page 3.1-4 – The first bullet point under the heading Southern California Association of Governments (SCAG) is revised as follows:

> RTP – SCAG updates its long-range (i.e., minimum 20 years) RTP/ Sustainable Communities Strategy (SCS) every four years, per federal law (23 U.S.C.A. §134 et seq) and state law (SB 375). SCAG's 2020–2045 RTP/SCS "Connect SoCal" was adopted in May 2020 for federal transportation conformity purposes; the plan in its entirety was formally adopted in September 2020. *Since the release of the Draft EIR, SCAG has released and adopted its 2024-2050 RTP/SCS, Connect SoCal 2024. See Section 4.4 of this Final EIR for more information on how the information in Connect SoCal 2024 relates to this environmental review process.*

Page 3.1-44 – The Hawthorne Option construction impacts text is revised as follows:

> Transit: During construction, some existing bus stops may need to be temporarily *closed and* relocated; this is a common practice and is communicated in advance to passengers and posted with signs. Because the project would be constructed in phases, it is anticipated that bus service would be maintained with stop relocations shifting in response to construction stages. Construction would not preclude planning for or expanding transit options.
>
> Roadways: The construction would occur in stages that would temporarily reduce travel lanes on Hawthorne Boulevard progressively in segments along the alignment. Additionally, there could be short-term closures of freeway shoulder and/or travel lanes and select ramps on I-405. Although these activities would temporarily reduce travel efficiency, alternate routes are available for travelers through the area on parallel major roadways. Pursuant to PF-T-1, during construction, access to businesses would be maintained during business hours, and access

~~would remain to neighborhoods, although some detours may be required and would be signed~~ *to and from neighborhoods would remain, although some detours with signage may be required*. The project could temporarily increase the potential for neighborhood cut-through traffic, which would be addressed through the use of signed detours and other strategies to be included in the CTMPs.

Bicycling and Walking: Similarly, access to bicycle routes and pedestrian facilities would remain during construction although some alternate routes for pedestrians may be required during construction on the east side of Hawthorne Boulevard when curb work would encroach on the sidewalk. Construction of the project would not preclude jurisdictions from planning or implementing improved bicycling and walking infrastructure. No existing or planned bicycle facilities ~~are directly on the streets affected by construction. Small segments of intersecting bikeways, for example, on 190th Street immediately east of Hawthorne Boulevard, may be temporarily shifted, reduced, or closed during construction.~~ *would be directly affected by construction of the Hawthorne Boulevard Option. However, indirect temporary impacts may occur along small segments of [existing/planned] intersecting bikeways. For example, travel lanes and sidewalks on 190th Street may be temporarily shifted, reduced, or closed during construction east of Hawthorne Boulevard.* ~~Typically, signage~~ *Signage* warning road users to share the lane with bicyclists ~~is~~ *would be* provided *as needed* for the reduced segment; the bike lane on either side of the construction activity would remain unaffected by the construction.

Page 3.1-45 – The Proposed Project operational impacts, Policies Addressing Transit, text is revised as follows:

Relevant regulatory plans, policies, and ordinances set forth by Metro, discussed in ~~Section 2.2.16~~ *Appendix 3.1-A, Transportation Policy Analysis*, include the 2020 LRTP, TOC Implementation Plan, Sustainability Strategic Plan, Goods Movement Strategic Plan, Measure M Expenditure Plan, BRT Vision & Principles Study, 2014 SRTP, Grade Crossing Safety Policy, FLM Strategic Plan, Complete Streets Policy, Vision 2028 Plan, Next Gen Bus Study, and ATSP. The Proposed Project is consistent with and would not conflict with Metro's plans.

4.6 CHAPTER 3.2 - LAND USE AND PLANNING

Page 3.2-1 – The last paragraph under the heading Southern California Association of Governments (SCAG) is revised as follows:

The Connect SoCal Project List, including both funded projects through the 2019 Federal Transportation Improvements Program (FTIP) as well as strategic projects, identifies funding for the following public transit projects in the land use and planning resource study area (RSA): the Metro C Line (Green) extension to Torrance (this project), a city bus transfer station at the Redondo Beach Transit Center (TC), the Torrance TC, called the Torrance Transit Park and Ride Regional Terminal in the FTIP, and a transit service connection between Long Beach and the South Bay Galleria. *Since the release of the Draft EIR, SCAG has released and adopted its 2024-2050 RTP/SCS, Connect SoCal 2024. See Section 4.4 of this Final EIR for more information on how the information in Connect SoCal 2024 relates to this environmental review process.*

Page 3.2-2 – In Table 3.2-2 City of Lawndale – Relevant Regulations, the fourth subheader is revised as follows:

Table 3.2-2. City of Lawndale – Relevant Regulations

Code/Goal/Policy	Description
City of Lawndale ~~Necessary Regulations~~ *Zoning Regulations*	

Page 3.2-5 – The text under the Zoning heading is revised as follows:

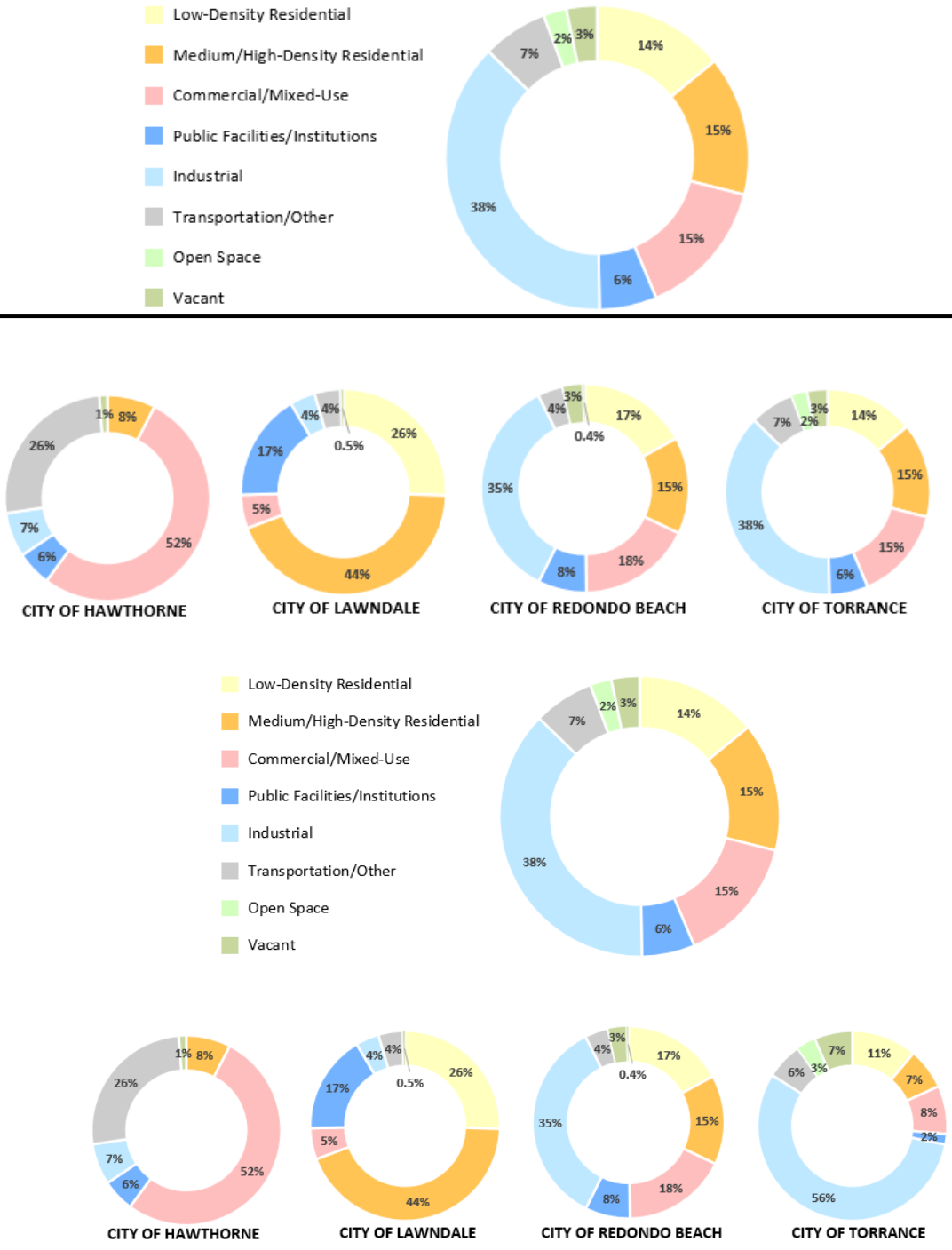
> The City of Torrance's Planning and Land Use Code (commonly referred to as the Zoning Code and last amended in ~~June 2020~~ *January 2023*) serves as the primary implementation tool for the General Plan. The Planning and Land Use Code is a regulatory document that establishes specific standards for the use and development of all properties in the City. The Planning and Land Use Code regulates development intensity using a variety of methods, such as setting limits on building setbacks, yard landscaping standards, and building heights. The Planning and Land Use Code also indicates which land uses are permitted in the various zones. The purpose of the Planning and Land Use Code is to provide the economic and social advantages resulting from an orderly planned use of land resources and to conserve and promote the public health, safety, and general welfare.

Page 3.2-6 – The following information is added under the Hawthorne Boulevard Corridor Specific Plan heading:

> The 1996 City of Torrance Hawthorne Boulevard Corridor Specific Plan outlines land use and transportation goals, objectives, policies, and standards for a six-mile section of the Hawthorne Boulevard Corridor. The Specific Plan acknowledges and supports transit service that enhances mobility in the corridor and serves as a convenient alternative to automobile travel. The Specific Plan includes a policy, which requires coordination with local and regional transit services operating within the corridor *to enhance transit availability and convenience. This Specific Plan aims to support local businesses and maintain a healthy retail tax base for the City of Torrance. Additionally, the envisioned design concept for the North Torrance District positions it as a northern gateway to the city and its most prominent commercial boulevard, fostering an active, community-oriented commercial environment.* This policy serves to maximize the transit service provided and transit user convenience.

Page 3.2-12 – Figure 3.2-5. Proposed Project and Trench Option – Percentage of Existing Land Uses in Resource Study Area is replaced as follows:

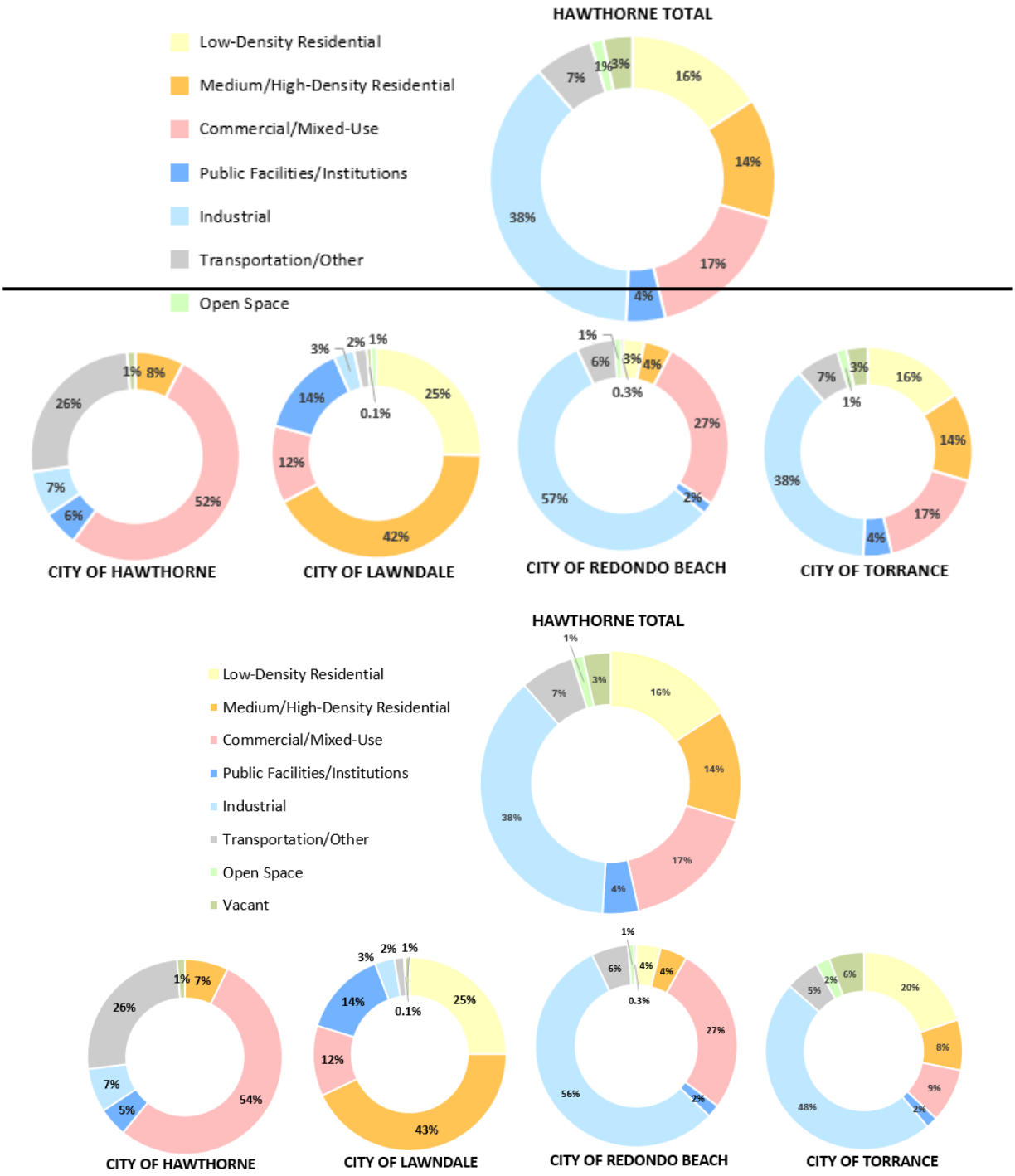
Figure 3.2-4.65 Proposed Project and Trench Option – Percentage of Existing Land Uses in Resource Study Area



Source: SCAG, 2020; STV, 2022
Note: Percentages may not add up to 100 due to rounding.

The figure and caption of Figure 3.2-10 Hawthorne Option – Percentage of Existing Land Uses in Resource Study Area is replaced as follows:

Figure 3.24.6***-10. Hawthorne Option – Percentage of Existing Land Uses in Resource Study Area***



Source: SCAG, ~~2020~~ *2016*; STV,2022
Note: Percentages may not add up to 100 due to rounding.

Page 3.2-21 – The text is revised under the City of Torrance heading as follows:

Zoning along Hawthorne Boulevard is predominantly single-family residential along the east side of Hawthorne Boulevard between Redondo Beach Boulevard and 180th Street. From 180th Street south, commercial uses, including vehicle dealerships, restaurants, auto businesses, and a mobile home residential community, exist. Additionally, some industrial uses exist near the Torrance TC. Before rejoining the Metro ROW at 190th Street, the Hawthorne Option is surrounded by land zoned Hawthorne Boulevard Specific Plan and Single Family, Two-Family, and Limited Multiple Family Residential. The portion of the RSA surrounding the South Bay Galleria Station that falls within the City of Torrance is almost entirely Residential, with a few parcels zoned Planned Development, Public Use, General Commercial, and Light Agricultural. As with the Proposed Project and Trench Option, the primary zoning classifications along the alignment from 190th Street to the proposed Torrance TC are Heavy Manufacturing and Residential zones, including Single Family, Two-Family, Limited Multiple Family, and some Commercial zones along Hawthorne Boulevard.

Page 3.2-23 – The first paragraph on the page is revised as follows:

The Hawthorne Option would require 2.9 miles of elevated structures to be constructed parallel to the west side of the I-405 and continuing in the median of Hawthorne Boulevard between Manhattan Beach Boulevard and 190th Street with no at-grade crossings. Most of the land uses along Hawthorne Boulevard are primarily Residential, Commercial/Mixed land use, Industrial, and Public facilities/Institutional use. The Hawthorne Option would require additional parcel acquisitions to construct the elevated guideways and stations when compared to the Trench Option and Proposed Project between the existing Redondo Beach (Marine) Station and 190th Street. *These acquisitions would not change the land use patterns so as to indirectly cause a physical division within the community.*

Page 3.2-26 – Several rows of Table 3.2-5 are revised as follows (those not included below remain unchanged):

Table 3.2-5. Consistency Analysis of Land Use Plans, Policies, and Regulations

Policies/Goals	Consistency of the Proposed Project and Options
Local Regulations	
City of Torrance, Hawthorne Boulevard Corridor Specific Plan	
Hawthorne Boulevard Corridor Specific Plan: • *Providing transit services that provide convenient alternatives to car travel.* • *Support local businesses and ensure a robust retail tax base by creating a thriving commercial environment.* • *Foster an active, community-oriented atmosphere that encourages social interaction and engagement.* • *Ensure collaboration with local and regional transit agencies to maximize transit efficiency.*	***Consistent**. This Project aligns with the Hawthorne Boulevard Corridor Specific Plan, which balances economic growth with community needs and transportation efficiency.*

Policies/Goals	Consistency of the Proposed Project and Options
City of Torrance, General Plan	
General Plan Goals: • A balanced transportation system that provides for the safe, convenient, and efficient movement of people and goods throughout the city and region and an infrastructure system that supports the local economy and quality of life in Torrance • Promote and facilitate travel by alternative modes of transportation such as walking, bicycling, and transit; and • Achieve a high quality of life through a balanced mix of attractive Residential neighborhoods, high-quality public services, and economically viable and attractive Commercial and Industrial areas.	**Consistent**. The Project aligns with these General Plan goals, which include a transportation supporting local economy and quality of life, encouraging other modes (transit) of travel, and creating an attractive community with quality public services which may include transit. In addition to the consistency of these policies, there would be no conflicts with ~~change to~~ existing land use patterns.
City of Redondo Beach, General Plan	
Land Use Element: • Goal 1D: Provide for the development of public infrastructure to support existing and future residents, businesses, recreation, and other uses. • Goal 1F: Maintain the fundamental pattern of existing land uses, preserving Residential neighborhoods and Commercial and Industrial districts, while providing opportunities for intensification or reuse of selected sub-areas, which improve the definition of centers of community activity and identity. • Objective 1.8: Commit lands for the continued operation of public infrastructure which supports residents, businesses, and visitors and protects them from environmental hazards. • Policy 1.41.8 Integrate public transit facilities on the [South Bay Galleria] site and ensure that they are accessible by automobile, bicycle, and walking from peripheral Residential neighborhoods. *Circulation Element Goals:* • Reduce Trip Generation • Take Action on Climate Change • Promote Alternative Modes • Plan Regionally • Pursue Transit Priorities. • G14 – Increase the provision of bike lockers, bike racks, and lighting for bike facilities;	**Consistent.** These policies support the following which all apply to the Project: • Public infrastructure development that protects the public from environmental hazards and contributes to community uses. • Maintaining existing land use and improving centers of community activity. • Integrating public transit facilities. • Providing reliable, safe fixed-route transit • Policy P31 states the extension of the Metro C (Green) Line. The City of Redondo Beach also identifies the South Bay Galleria as a potential site for transit-oriented development due to the anticipated C Line (Green) connection. In addition to the consistency of these policies, there would be no *conflicts with* ~~change to~~ existing land use patterns.

Policies/Goals	Consistency of the Proposed Project and Options
• G16 – Provide reliable, safe fixed-route transit; • P13 – Encourage shared parking between land uses when consistent with industry standards; • P14 – Explore parking maximums around fixed guideway transit investment to maximize transit ridership; • P23 – Focus on [bicycle and pedestrian] access at transit stations, the waterfront, South Bay Galleria, Artesia Boulevard, Riviera Village, Pacific Coast Highway retail zones, and school zones; • P30 – Promote use of alternative transportation for short trips; conduct periodic bicycle and pedestrian counts to assess whether alternative mode use is increasing; • P31 – Extend Metro's C Line (Green); • P32 – Create multi-modal transit hubs; • P33 – Enhance transit wayfinding and signage at transit stops; • P35 – Provide bus turnouts whenever possible so that busses do not interrupt the regular flow of vehicle traffic, particularly on Pacific Coast Highway; and • P38 – Investigate expansion of existing bus service.	
City of Lawndale, General Plan	
Land Use Element Policy/Goals: • Goal 1: Preserve and enhance the environment, values, aesthetic character, and image of Lawndale as a vital, attractive, desirable, and safe urban community; • Policy 1a: Maintain the existing Residential development pattern, except in locations along major transportation corridors and public centers where Commercial or higher-density Residential uses are more appropriate; *Circulation Element Policy/Goals:* • Goal 1: Provide an integrated transportation system for the safe and efficient movement of people and goods with minimal disruption to the environment within and through the City; • Goal 2: Consider all modes of transportation; and	**Consistent.** These policies support maintaining: • land use patterns except for major transit corridors • a viable and desirable community • integrating public transportation facilities and encouraging all modes of transportation In addition to the consistency of these policies, there would be no *conflicts with* ~~change to~~ existing land use patterns.

Policies/Goals	Consistency of the Proposed Project and Options
• Goal 5: Participate in and assist with coordinating regional efforts which integrate the City's transportation system with the regional transportation system.	

Source: SCAG, 2020. SCAQMD, 2024. City of Hawthorne, 1990. City of Torrance Hawthorne Boulevard Specific Plan, 1996. City of Torrance, 2010. City of Lawndale General Plan, 1992a; 1992c.

Page 3.2-31 – The final paragraph under 3.2-7.3 Hawthorne Option is revised to format text in bold as follows:

> Operation of the Hawthorne Option would not divide the existing community in conjunction with the related projects as access within and out of the communities would be unchanged or changed very little by these projects. Further, the related projects would be required to be consistent with applicable general plans and zoning codes. Therefore, the Hawthorne Option, combined with past, present, and reasonably foreseeable projects, ~~would not result in a cumulatively significant impact to land use and planning during construction or operation~~ ***would not result in a cumulatively significant impact*** *to land use and planning during construction or operation.*

4.7 CHAPTER 3.3 – VISUAL AND AESTHETICS

Page 3.3-10 – PF-AES-2 is revised as follows:

> **PF-AES-2. Metro Design Standards**
>
> All project components, including, but not limited to track guideway, auxiliary facilities, *and station* (public and ancillary) facilities, ~~and the parking facility~~, will be designed per the MRDC and consistent with the objectives of the Metro Art Program Policy, Metro's Transit Service Policies & Standards, Systemwide Station Design Standards Policy, and Standard/Directive Drawings, or equivalent. Landscaping and operational lighting will also be installed consistent with these design standards.

Page 3.3-57 – The first paragraph of Section 3.3-4.3.2 Operational Impacts is revised as follows:

> To assess the potential visual changes that would result from the operation of the Project, 23 KOPs were specifically selected to depict the Proposed Project's visual changes. Visual simulations from these KOPs were prepared to provide a before and after comparison of the visual effects that would result from the Proposed Project, Trench Option, and Hawthorne Option. The KOPs are representative of direct views within the RSA; simulations from the same locations show how these views would change as a result of the implementation of the Proposed Project. The simulated views represent conceptual design and are not intended to represent the final Project design. The simulations are included to conceptually illustrate the general visual changes that would be expected to occur. Details concerning the landscaping and soundwalls for the Proposed Project and Options are provided, as relevant, in the text corresponding with the visual simulations. The locations of the KOPs are shown on Figure 3.3-33. *See Appendix 2-A for more detailed plans and profiles for the alignments, as well as typical cross-sections depicting the general heights and widths of the project elements.*

4.8 CHAPTER 3.4 - AIR QUALITY

Page 3.4-6 – The first paragraph under the heading Southern California Association of Governments (SCAG) is revised as follows:

While Southern California is a leader in reducing emissions and ambient levels of air pollutants are improving, the SCAG region continues to have the worst air quality in the nation. The SCAG region encompasses six counties (Imperial, Los Angeles, Orange, Riverside, San Bernardino and Ventura) and 191 cities in an area covering more than 38,000 square miles. SCAG is the Metropolitan Planning Organization for the six-county region and is required to prepare an RTP/SCS every four years that provides a comprehensive framework and outlook for guiding growth in population, housing, and employment. The most recent iteration of the SCAG RTP/SCS that has been formally adopted is the Connect SoCal 2020–2045 RTP/SCS (Connect SoCal), which was officially adopted in September 2020 and forecasts regional growth projections through the horizon year of 2045. *Since the release of the Draft EIR, SCAG has released and adopted its 2024-2050 RTP/SCS, Connect SoCal 2024. See Section 4.4 of this Final EIR for more information on how the information in Connect SoCal 2024 relates to this environmental review process.*

Page 3.4-51 – 3.4-4.3.2 Operational Impacts is revised as follows (before last sentence under the Proposed Project discussion):

Less than Significant Impact. The following analysis includes criteria air pollutants, mobile source air toxics, and CO hot-spots.

Regarding criteria air pollutants, operation of the Proposed Project would extend the existing Metro C (Green) Line light rail and would not introduce a new substantial permanent direct source of emissions to the RSA. No direct source of air pollutant emissions along the Proposed Project alignment would occur as the light rail cars, stations, and systems and signals would be electrically powered and connected to the SCE grid. Minor stationary sources would be associated with the use of landscaping equipment and sanitation service vehicle trips at station facilities. Proposed Project operations would not involve a facility where a significant number of vehicles would dwell and would not deteriorate congestion at nearby intersections. *Regarding localized* O_3*, it is both a natural and a man-made product that occurs in the Earth's upper atmosphere (the stratosphere) and lower atmosphere (the troposphere). Depending on where it is in the atmosphere,* O_3 *affects life on Earth in either good or bad ways. Stratospheric* O_3 *is formed naturally through the interaction of solar ultraviolet radiation with molecular oxygen. The "ozone layer," approximately 6 through 30 miles above the Earth's surface, reduces the amount of harmful UV radiation reaching the Earth's surface. Tropospheric or ground-level* O_3*–what we breathe–s formed primarily from photochemical reactions between two major classes of air pollutants, volatile organic compounds (VOC) and nitrogen oxides (NOx). The Proposed Project would reduce regional VMT thereby leading to regional reductions in pollutant emissions. Therefore, the Proposed Project would not increase* O_3 *levels. This includes localized* O_3 *concentrations as the Proposed Project is primarily grade-separated and would not substantially increase local vehicle delays.* Operation of the Proposed Project would not have the potential to expose sensitive receptors to substantial criteria pollutant (i.e., O_3, NO_2, and PM) concentrations; impacts would be less than significant.

~~Regrading~~ *Regarding* mobile source air toxics *(MSAT)*, federal and state regulations for vehicle engines and fuels will cause overall MSAT emissions to decline significantly over the next several decades. An analysis of national trends with the USEPA MOVES model forecasts a combined reduction of over 80% in the total annual emission rate for the priority MSAT from 2010 to 2050 and VMT is projected to increase by over 100%. MSAT emissions are directly correlated to VMT;

therefore, reductions in daily MSAT emissions would result through Proposed Project implementation. Operation of the Proposed Project would reduce daily regional VMT by approximately 34,500 miles relative to the 2042 without Project conditions, thereby decreasing daily MSAT emissions throughout the RSA. The Proposed Project would not result in adverse effects related to MSAT emissions.

Regarding CO hot-spots, although the SCAB is designated as a maintenance area for CO, it is no longer a pollutant of concern in the region. According to CARB, the NAAQS for CO was last exceeded in 2002. The SCAQMD last published data for 2020 included maximum 1- and 8-hour concentrations of 1.6 and 1.3 parts per million (ppm), respectively, in the Proposed Project area. These concentrations were substantially below the 1- and 8-hour NAAQS of 20 and 9 ppm. The Proposed Project is planned to open in 2030. As indicated in the CARB EMFAC model, CO emission rates would be substantially less in 2030 than in 2003 when CO attainment was demonstrated in the AQMP. Therefore, operation of the Proposed Project would not result in a significant impact related to a CO hot spot.

Both light rail and freight train operations would generate small amounts of dust due to braking friction and resuspended particulates from trains passing over unpaved areas. However, these emissions would not result in a substantial increase in localized particulate matter concentrations along the alignment near residential receptors. Furthermore, proposed sound walls that would be installed between the rail tracks and the adjacent residences—from Manhattan Beach Boulevard to Artesia Boulevard, from Artesia Boulevard to Grant Avenue, and from 182nd Street to Hawthorne Boulevard—would serve as a physical barrier that would reduce dust dispersion and deposition into the surrounding communities as demonstrated through extensive controlled and real-world studies conducted by the SCAQMD. Based on the above analyses, operation of the Proposed Project would result in a **less than significant impact** related to criteria pollutant concentrations, toxic air contaminants, and CO hot-spots.

Page 3.4-52 – 3.4-4.3.2 Operational Impacts under the Trench Option is revised as follows:

Less than Significant Impact. The impacts assessment for the Trench Option is like the analysis presented for the Proposed Project, as operations will occur along the same alignments and use the same operating pattern and equipment. Long-term operation of the Trench Option would not introduce any new direct source of criteria pollutant or TAC emissions to the regional or localized RSA. Metro employee vehicle trips would not be expected to increase with implementation of the Trench Option, and the light rail vehicles would be propelled by electricity with no internal combustion occurring that would produce hydrocarbon and other pollutant emissions. Furthermore, operation of the Trench Option would reduce daily regional VMT by approximately 34,500 miles relative to the 2042 without Project condition, thereby decreasing daily MSAT emissions throughout the RSA.

Similar to the discussion for the Proposed Project, with implementation of the Trench Option both light rail and freight train operations would generate small amounts of dust due to braking friction and resuspended particulates from trains passing over unpaved areas. However, these emissions would not result in a substantial increase in localized particulate matter concentrations along the alignment near residential receptors. Furthermore, proposed soundwalls that would be installed between the rail tracks and the adjacent residences—rom West 163rd Street to Artesia Boulevard, from Artesia Boulevard to Grant Avenue, and from 186th Street to Hawthorne Boulevard—would serve as a physical barrier that would reduce dust dispersion and deposition into the surrounding communities as demonstrated through extensive

controlled and real-world studies conducted by the SCAQMD. Operation of the Trench Option would result in a **less than significant impact** related to substantial pollutant concentrations at receptor locations.

Page 3.4-52 – 3.4-4.3.2 Operational Impacts under the Hawthorne Option is revised as follows:

Less than Significant Impact. The impacts assessment for the Hawthorne Option is like to the analysis presented for the Proposed Project, as operations would occur along a similar alignment and use the same operating pattern and equipment. Long-term operation of the Hawthorne Option would not introduce any new direct source of criteria pollutant or TAC emissions to the regional or localized RSA. Metro employee vehicle trips would not be expected to increase with implementation of the Hawthorne Option, and the light rail vehicles would be propelled by electricity with no internal combustion occurring that would produce hydrocarbon and other pollutant emissions. Furthermore, operation of the Hawthorne Option would reduce daily regional VMT by approximately 34,900 miles relative to the 2042 without Project condition, thereby decreasing daily MSAT emissions throughout the RSA.

Similar to the discussion for the Proposed Project, with implementation of the Hawthorne Option both light rail and freight train operations would generate small amounts of dust due to braking friction and resuspended particulates from trains passing over unpaved areas. However, these emissions would not result in a substantial increase in localized particulate matter concentrations along the alignment near residential receptors. Furthermore, proposed sound walls that would be installed at the outer edge of the elevated rail guideway—from West 156th Street to Manhattan Beach Boulevard, from Manhattan Beach Boulevard to south of Redondo Beach Boulevard, from the South Bay Galleria Station to 182nd Street, and from 182nd Street to Butler Drive—would serve as a physical barrier between adjacent residences and uses and would reduce dust dispersion and deposition into the surrounding communities as demonstrated through extensive controlled and real-world studies conducted by the SCAQMD. Operation of the Hawthorne Option would result in a **less than significant impact** related to substantial pollutant concentrations at nearby receptor locations.

Page 3.4-55 – Section 3.4-7 Cumulative Impacts, the headers for the analysis of each option are revised as follows:

3.4-~~1~~7.1. Proposed Project

3.4-~~1~~7.2. Trench Option

3.4-~~1~~7.3. Hawthorne Option

Page 3.4-56 – Section 3.4-7.1 Proposed Project, the fourth paragraph is revised as follows:

Furthermore, the analysis presented under impact criterion 3.4-4.3 demonstrated that construction of the Proposed Project would not generate localized emissions of NOX, CO, or particulate matter in excess of the applicable LST screening values. The SCAQMD LST screening values were designed to prevent the occurrence of unhealthy pollutant concentrations reaching sensitive receptors near construction sites. The same SCAQMD cumulative significance rationale can be applied to the localized emissions. Although it is possible that construction of other CEQA projects may occur within the localized RSA during construction of the Proposed Project*, such as the Mary K. Giordano Regional Transit Center Parking Structure*, emissions from Proposed Project construction would be controlled to the maximum extent feasible through implementation of BMPs contained within the Metro Green Construction Policy and would not

exceed the SRA 3 LST screening values. Therefore, construction of the Proposed Project would result in less than significant cumulative impacts at both the regional and localized geographic scales.

4.9 CHAPTER 3.5 - GREENHOUSE GAS EMISSIONS

Page 3.5-7 – The first paragraph under the heading Southern California Association of Governments (SCAG) is revised as follows:

> SCAG is the MPO for the six-county region that includes Los Angeles, Orange, Riverside, Ventura, San Bernardino, and Imperial counties. Connect SoCal, the 2020-2045 RTP/SCS, includes a strong commitment to reduce emissions from transportation sources to comply with SB 375. SB 375 requires CARB to develop regional CO2 emission reduction targets (exclusive of Pavley emissions that are counted separately), compared to 2005 emissions, for cars and light trucks for each MPO. The 2020–2045 RTP/SCS charts a course for closely integrating land use and transportation planning including in areas labeled as High Quality Transit Areas. High Quality Transit Areas reflect areas with rail transit service or bus service where lines have peak headways of less than 15 minutes. The 2020-2045 RTP/SCS was prepared through a collaborative, continuous, and comprehensive process by SCAG and it serves as an update to the 2016–2040 RTP/SCS. Major themes in the 2020–2045 RTP/SCS that are relevant to the Proposed Project include integrating strategies for land use and transportation, striving for sustainability, protecting and preserving the existing transportation infrastructure, increasing capacity through improved system management, and giving people more transportation choice. *Since the release of the Draft EIR, SCAG has released and adopted its 2024-2050 RTP/SCS, Connect SoCal 2024. See Section 4.4 of this Final EIR for more information on how the information in Connect SoCal 2024 relates to this environmental review process.*

Page 3.5-16 – The text under the Proposed Project Construction is revised as follows:

> Table 3.5-7 summarizes the Proposed Project construction schedule, including the amount of material hauling that would occur during each phase in cubic yards (CY) and the daily construction crew size. Metro plans for contractors to use trucks with trailers (30-CY capacity total) to minimize heavy-duty truck trips involved in material hauling. Comprehensive off-road equipment lists were developed by Metro for each phase to estimate total GHG emissions that would be generated by Proposed Project construction. Construction would be anticipated to take approximately five *years*.

Page 3.5-18 – 3.5-2.3. Operational GHG Emissions is revised in the paragraph and footnote of Table 3.5-10 as follows:

> Implementation of the Proposed Project would extend an existing electrically propelled Metro light rail transit line and would not require additional maintenance facilities that would introduce new direct sources of GHG emissions into the RSAs. Operations would predominantly involve changes to indirect sources of regional GHG emissions, including electricity generation to power the light rail transit corridor and stations, as well as transportation fuel savings associated with passenger vehicle trip displacement corresponding to increased transit ridership. Table 3.5-10 presents a summary of the annual projected vehicle revenue miles (VRM) for the Proposed Project and Options as well as the forecasted on-road vehicle miles traveled (VMT) displacement*, calculated using the potential operating pattern that results in the least VMT displacement*.

Table 3.5-10. Summary of Operational Parameters Relevant to GHG Emissions (2042)

Parameter	Proposed Project	Trench Option	Hawthorne Option
Annual Vehicle Revenue Miles	757,841	757,841	757,841
Annual On-Road VMT Displacement[1]	17,083,851	17,083,851	17,207,383

Source: Metro, 2022

[1]Calculated using the potential operating pattern that results in the least forecasted VMT displacement.

Page 3.5-29 – Table 3.5-16. Proposed Project and Options GHG Emissions (2042) is revised with a footnote to the table as follows:

Table 3.5-16. Proposed Project and Options GHG Emissions (2042)

Operational Source	Proposed Project	Trench Option	Hawthorne Option
Amortized Construction ($MTCO_2e$/year)	**436.6**	**638.5**	**459.9**
Light Rail Corridor Electricity (MWh/year)	6,946.5	6,946.5	6,946.5
Stations & Parking Lot Electricity (MWh/year)	882.0	882.0	882.0
Indirect Electricity Emissions ($MTCO_2e$/year)	**915.5**	**915.5**	**915.5**
Vehicle Trip Displacement (VMT[1]/day)	49,233	49,233	49,589
Emissions Displacement ($MTCO_2e$/year)	**(3,721.4)**	**(3,721.4)**	**(3,748.4)**
Total Annual Emissions ($MTCO_2e$/year)	**(2,369.4)**	**(2,167.4)**	**(2,373.0)**

Source: TAHA, 2022

[1]Calculated using the potential operating pattern that results in the least forecasted VMT displacement.

4.10 CHAPTER 3.6 - NOISE AND VIBRATION

Page 3.6-52 – Figure 3.6-22. Proposed Project – Combined Light Rail and Freight Relocation Mitigated Noise Impacts (2 of 4) is replaced to correct a cluster labeling error:

Figure 3.6-22. Proposed Project – Combined Light Rail and Freight Relocation Mitigated Noise Impacts (2 of 4)

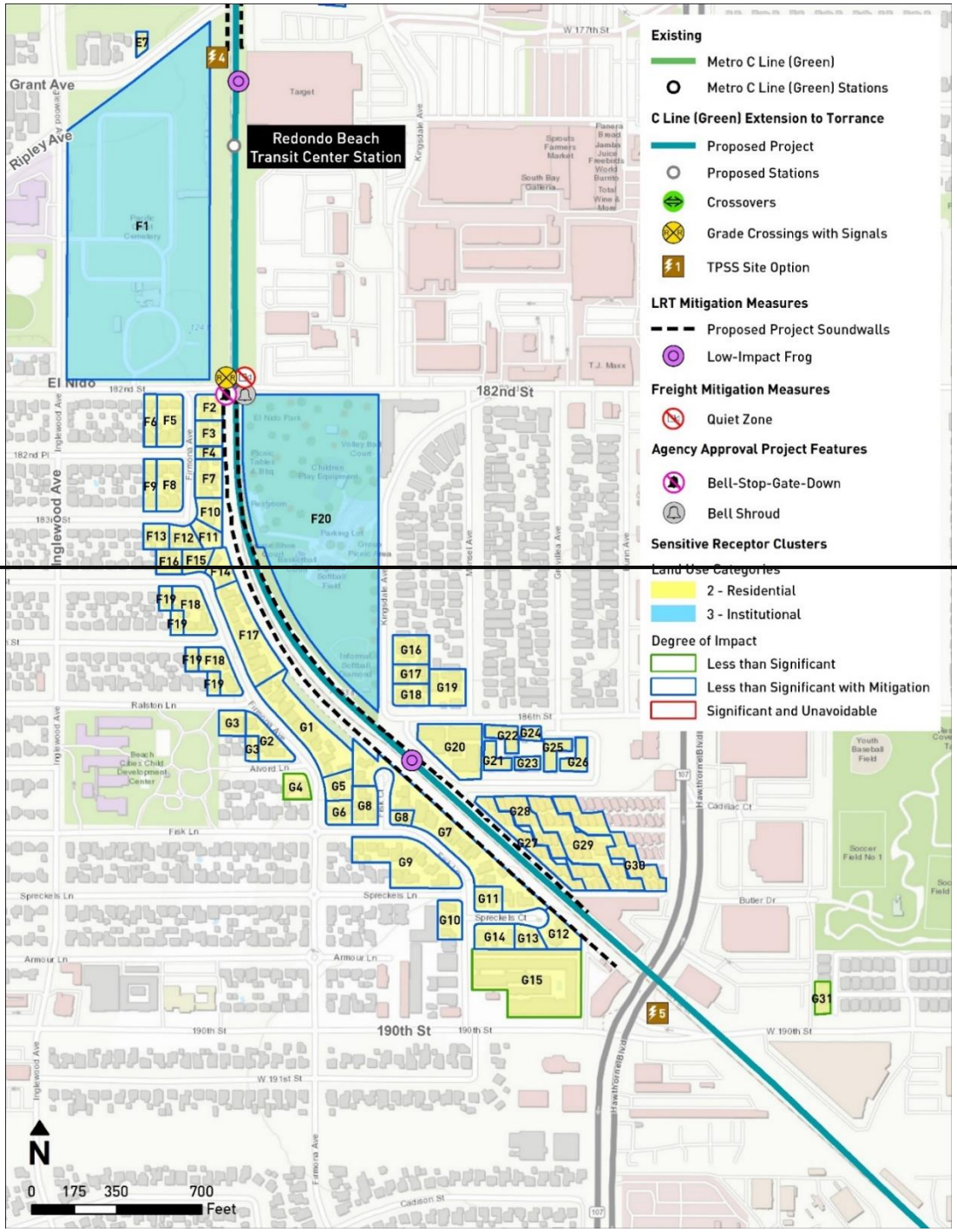


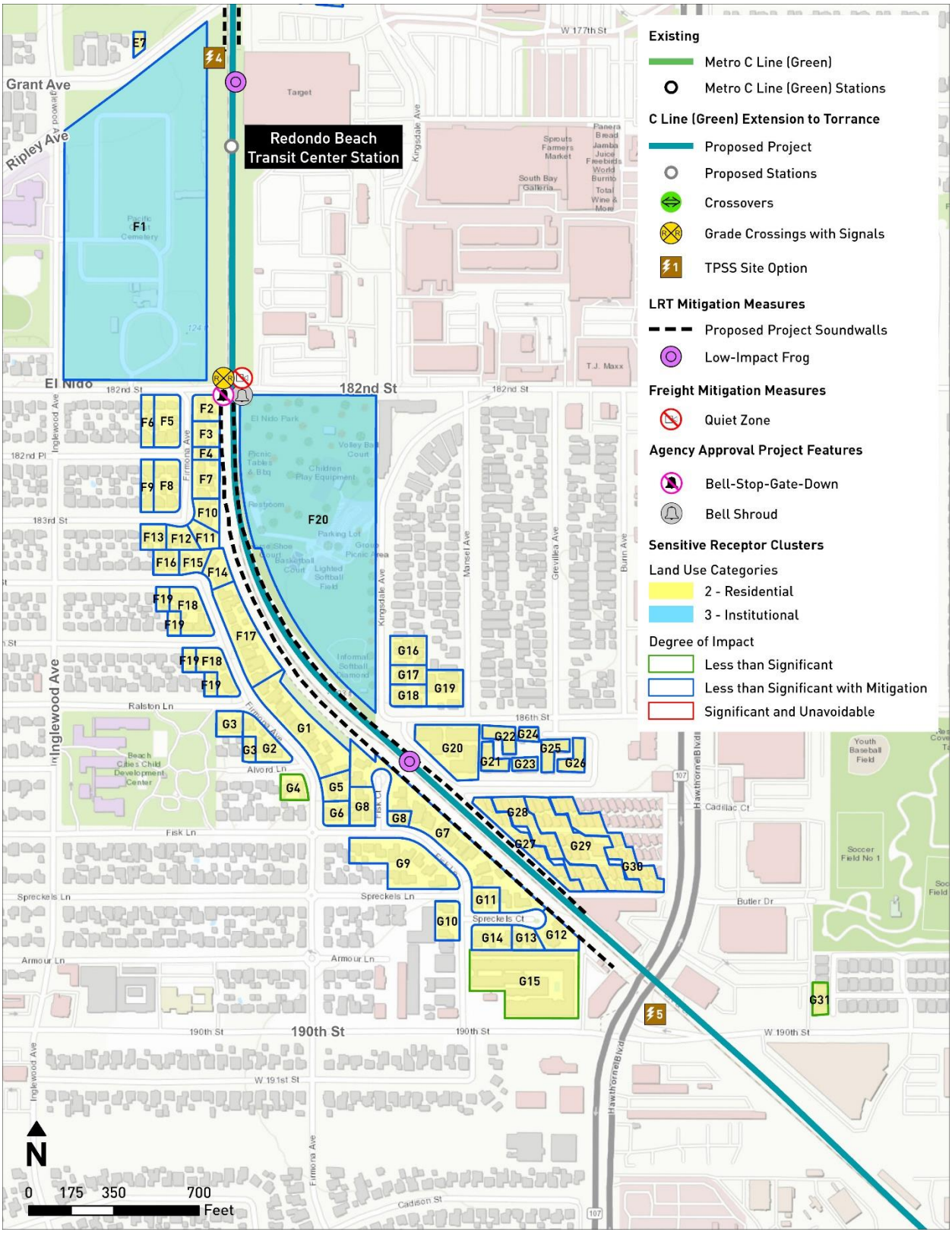


Source: TAHA, 2025

Page 3.6-53 – Figure 3.6-23. Proposed Project – Combined Light Rail and Freight Relocation Mitigated Noise Impacts (3 of 4) is replaced to correct a cluster labeling error:

Figure 3.6-23. Proposed Project – Combined Light Rail and Freight Relocation Mitigated Noise Impacts (3 of 4)





Source: TAHA, 2025

Page 3.6-66 – Figure 3.6-26. Trench Option – Combined Light Rail and Freight Relocation Mitigated Noise Impacts (3 of 4) is replaced to correct a cluster labeling error:

Figure 3.6-66. Trench Option – Combined Light Rail and Relocated Freight Mitigated Noise Impacts (2 of 3)

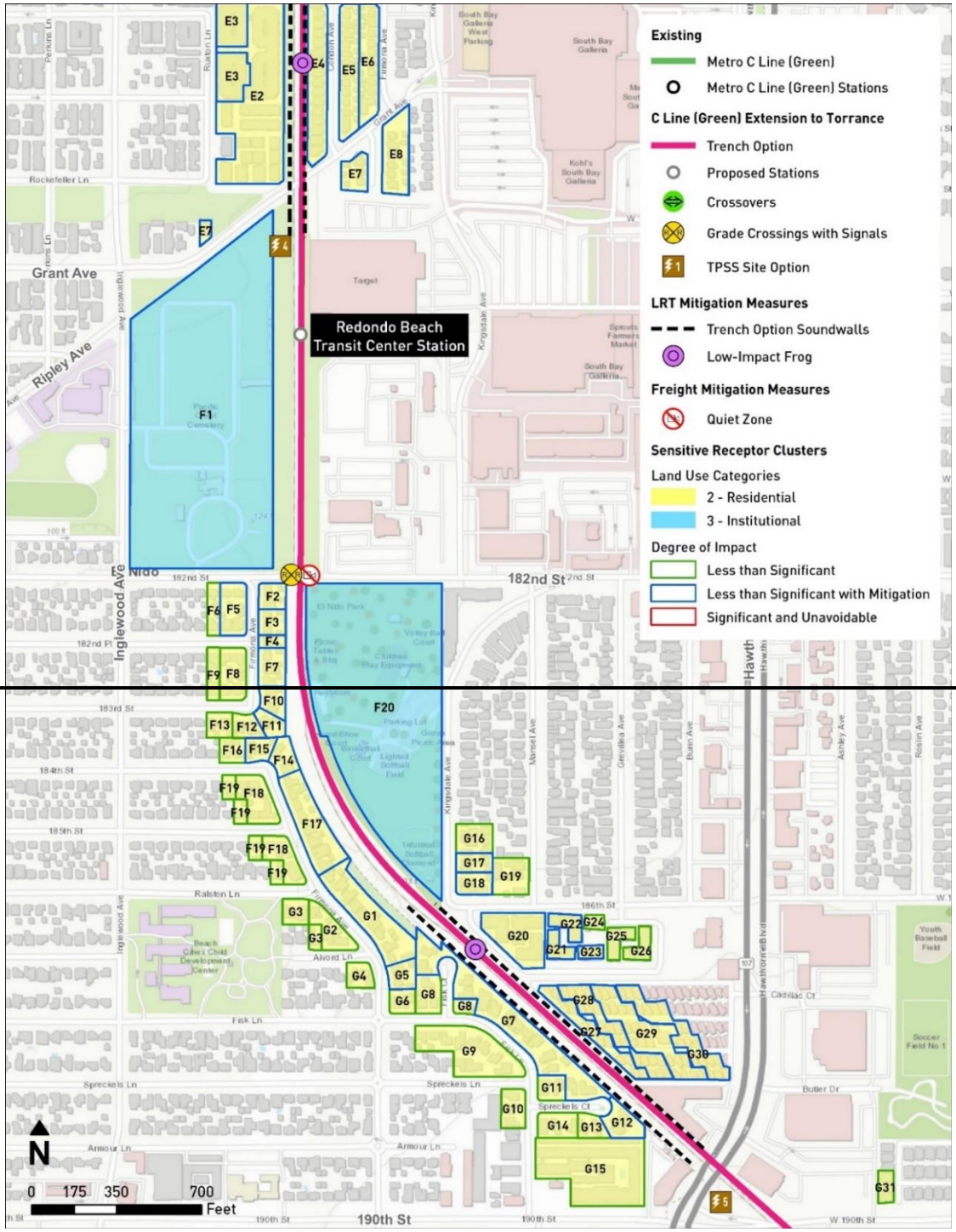


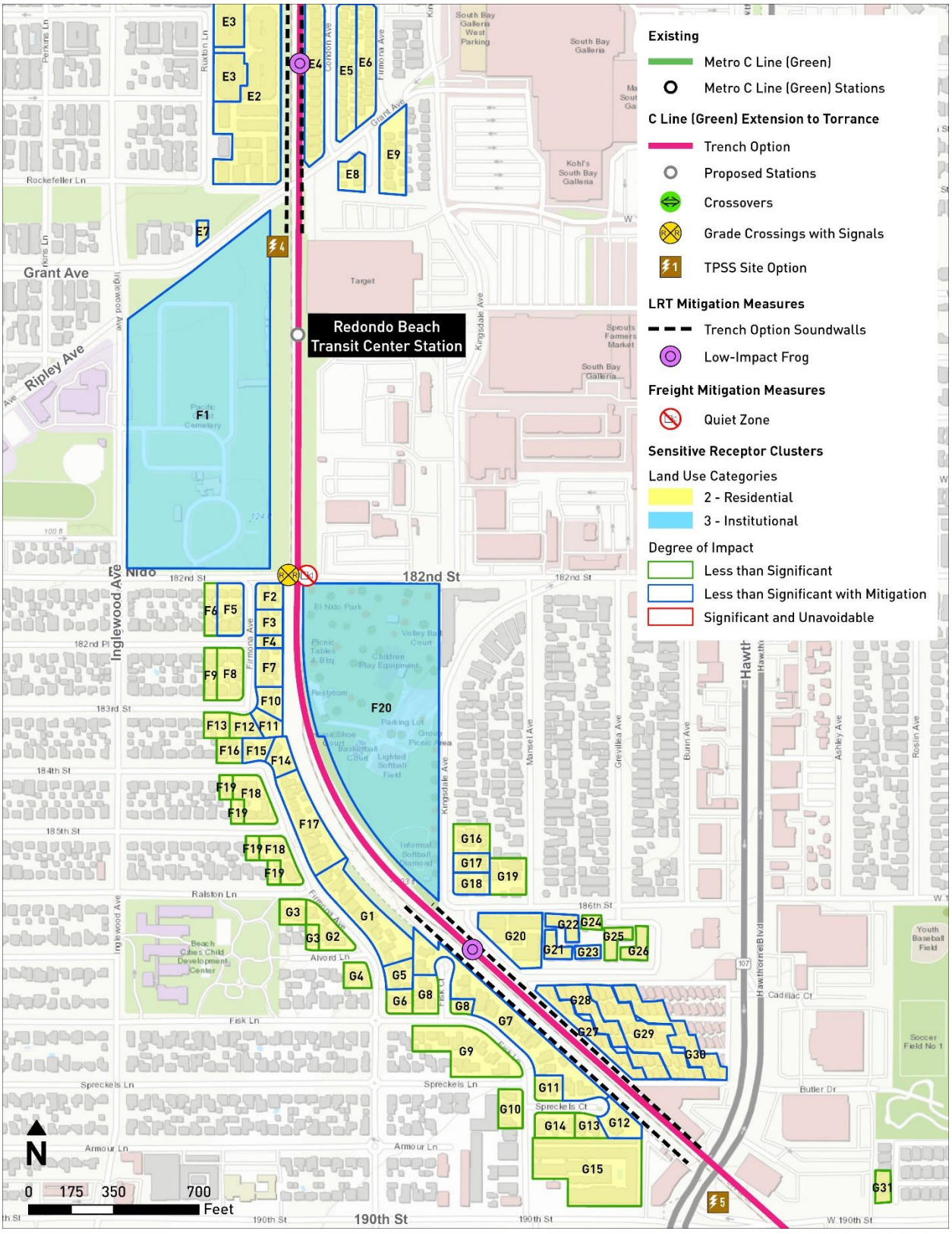


Source: TAHA, 2025

Page 3.6-67 – Figure 3.6-27. Trench Option – Combined Light Rail and Freight Relocation Mitigated Noise Impacts (3 of 4) is replaced to correct a cluster labeling error:

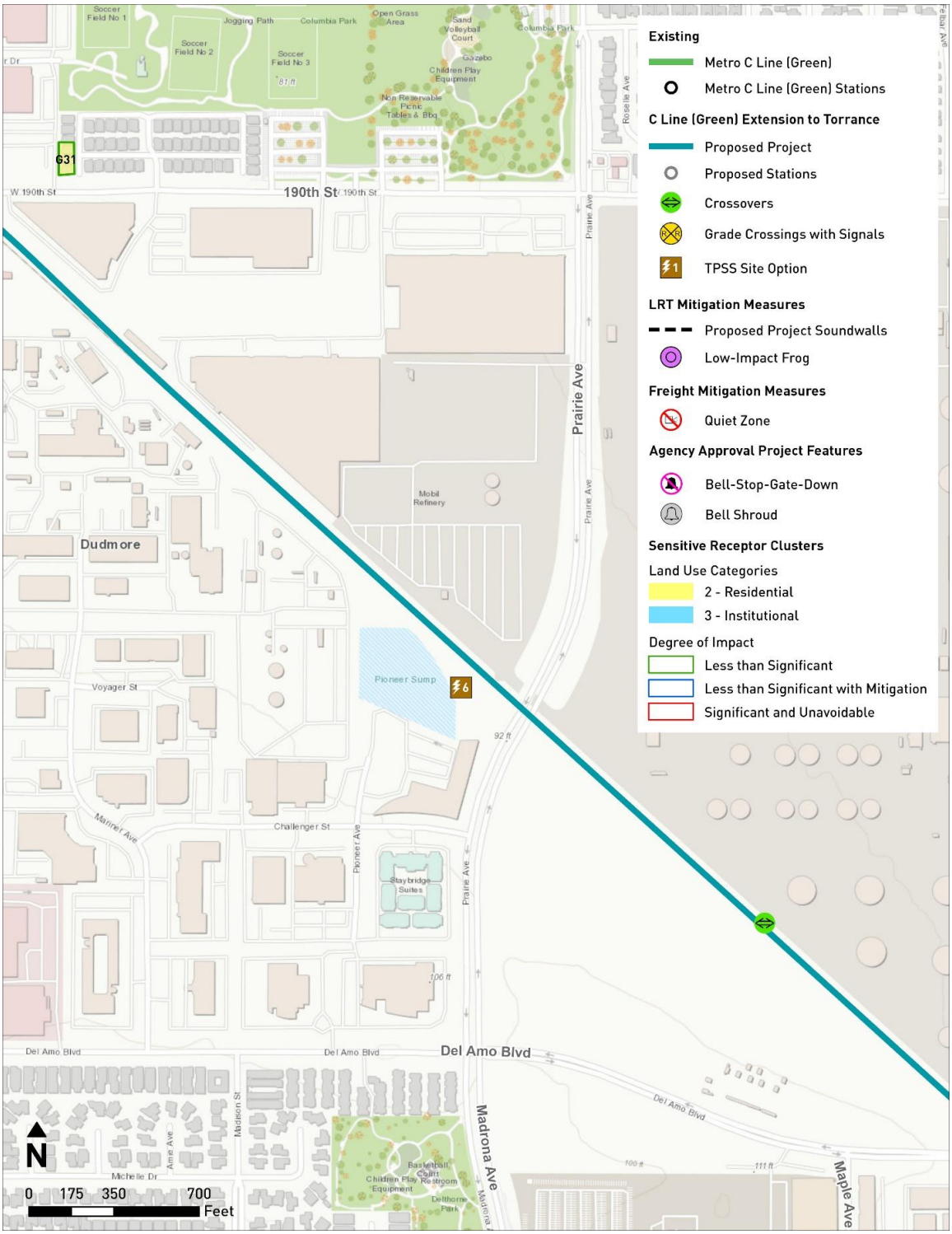
Figure 3.6-67. Trench Option – Combined Light Rail and Relocated Freight Mitigated Noise Impacts (3 of 3)





Source: TAHA, 2025

Page 3.6-54 – The following figure, which was not included in the Draft EIR because no sensitive receptors or noise impacts would occur in this area, is inserted between Figure 3.6-23. Proposed Project – Combined Light Rail and Freight Relocation Mitigated Noise Impacts (3 of 4) and Figure 3.6-24. Proposed Project – Combined Light Rail and Freight Relocation Mitigated Noise Impacts (4 of 4):



Source: TAHA, 2022

Page 3.6-55 – In Table 3.6-16 of the Draft EIR, values from the Trench Option's "Mitigated Freight and LRT Combined" column were inadvertently copied into the Proposed Project's corresponding column. In addition, baseline noise level assumptions for the area around 162nd Street are adjusted downward in this Final EIR to ensure consistency on both sides of the street. This change lowers the threshold at which a noise impact would be considered significant. However, even with the revised baseline, no significant noise impact was identified at this location. Table 3.6-16. Proposed Project – Combined Light Rail and Freight Relocation Mitigated Noise Impacts is revised as follows:

Table 3.6-16. Proposed Project – Combined Light Rail and Freight Relocation Mitigated Noise Impacts

Cluster No.	Land Use Category	Noise Level (Cat 2 dBA, L_{dn} or Cat 3 dBA, L_{eq})					Impact After Mitigation
		Existing	Unmitigated Freight and LRT Combined	Mitigated Freight and LRT Combined		Impact Threshold[1]	
A1	2	67.0	63.0	~~56.0~~	*54.0*	62.0	Less Than Significant With Mitigation
A2	2	67.0	63.0	~~58.0~~	*55.0*	62.0	Less Than Significant With Mitigation
A3	2	67.0	59.0	~~51.0~~	*59.0*	62.0	Less than Significant
A4	2	70.0	62.0	~~50.0~~	*57.0*	64.0	Less than Significant
A5	2	70.0	62.0	~~51.0~~	*57.0*	64.0	Less than Significant
A6	2	70.0	63.0	~~51.0~~	*57.0*	64.0	Less than Significant
A7	2	70.0	63.0	~~52.0~~	*58.0*	64.0	Less than Significant
B1	3	71.0	73.0	~~60.0~~	*61.0*	70.0	Less Than Significant With Mitigation
B2	2	66.0	67.0	~~52.0~~	*60.0*	61.0	Less Than Significant With Mitigation
B3	2	65.0	64.0	~~50.0~~	*59.0*	61.0	Less Than Significant With Mitigation
B4	2	65.0	62.0	~~47.0~~	*57.0*	61.0	Less Than Significant With Mitigation
B5	2	67.0	70.0	~~56.0~~	*61.0*	62.0	Less Than Significant With Mitigation
B6	2	66.0	65.0	~~50.0~~	*59.0*	61.0	Less Than Significant With Mitigation
B7	2	65.0	63.0	~~48.0~~	*57.0*	61.0	Less Than Significant With Mitigation
B8	2	71.0	70.0	~~55.0~~	*62.0*	65.0	Less Than Significant With Mitigation
B9	2	70.0	65.0	~~50.0~~	*60.0*	65.0	Less Than Significant With Mitigation
B10	2	70.0	63.0	~~48.0~~	*57.0*	64.0	Less than Significant
B11	2	71.0	70.0	~~56.0~~	*62.0*	65.0	Less Than Significant With Mitigation
B12	2	70.0	65.0	~~50.0~~	*60.0*	65.0	Less Than Significant With Mitigation
B13	2	70.0	63.0	~~48.0~~	*57.0*	64.0	Less than Significant
B14	2	71.0	70.0	~~56.0~~	*62.0*	65.0	Less Than Significant With Mitigation
B15	2	70.0	65.0	~~51.0~~	*59.0*	65.0	Less Than Significant With Mitigation
B16	2	70.0	63.0	~~48.0~~	*58.0*	64.0	Less than Significant
B17	2	~~70.0~~ *61.0*	65.0	~~54.0~~	*55.0*	~~65.0~~ *58.0*	Less Than Significant With Mitigation
B18	2	~~70.0~~ *58.0*	62.0	~~50.0~~	*52.0*	~~65.0~~ *57.0*	Less than Significant *With Mitigation*
B19	2	~~70.0~~ *57.0*	60.0	~~48.0~~	*49.0*	~~64.0~~ *56.0*	Less than Significant *With Mitigation*

Cluster No.	Land Use Category	Noise Level (Cat 2 dBA, L_{dn} or Cat 3 dBA, L_{eq})					Impact After Mitigation
		Existing	Unmitigated Freight and LRT Combined	Mitigated Freight and LRT Combined		Impact Threshold[1]	
B20	2	~~70.0~~ *61.0*	65.0	~~54.0~~	*55.0*	~~65.0~~ *58.0*	Less Than Significant With Mitigation
B21	2	~~70.0~~ *58.0*	62.0	~~50.0~~	*52.0*	~~65.0~~ *57.0*	Less than Significant *With Mitigation*
B22	2	~~70.0~~ *57.0*	60.0	~~48.0~~	*49.0*	~~64.0~~ *56.0*	Less than Significant *With Mitigation*
B23	2	61.0	65.0	~~54.0~~	*56.0*	58.0	Less Than Significant With Mitigation
B24	2	58.0	63.0	~~51.0~~	*53.0*	57.0	Less Than Significant With Mitigation
B25	2	57.0	60.0	~~48.0~~	*50.0*	56.0	Less Than Significant With Mitigation
B26	2	61.0	65.0	~~54.0~~	*56.0*	58.0	Less Than Significant With Mitigation
B27	2	58.0	63.0	~~51.0~~	*53.0*	57.0	Less Than Significant With Mitigation
B28	2	57.0	60.0	~~48.0~~	*51.0*	56.0	Less Than Significant With Mitigation
B29	2	61.0	65.0	~~54.0~~	*54.0*	58.0	Less Than Significant With Mitigation
B30	2	58.0	63.0	~~51.0~~	*51.0*	57.0	Less Than Significant With Mitigation
B31	2	57.0	60.0	~~48.0~~	*49.0*	56.0	Less Than Significant With Mitigation
B32	2	61.0	65.0	~~54.0~~	*55.0*	58.0	Less Than Significant With Mitigation
B33	2	58.0	63.0	~~51.0~~	*52.0*	57.0	Less Than Significant With Mitigation
B34	2	57.0	60.0	~~48.0~~	*49.0*	56.0	Less Than Significant With Mitigation
B35	2	71.0	71.0	~~61.0~~	*60.0*	65.0	Less Than Significant With Mitigation
B36	2	66.0	67.0	~~52.0~~	*57.0*	61.0	Less Than Significant With Mitigation
B37	2	65.0	64.0	~~49.0~~	*55.0*	61.0	Less Than Significant With Mitigation
B38	2	67.0	74.0	~~61.0~~	*61.0*	62.0	Less Than Significant With Mitigation
B39	2	66.0	67.0	~~52.0~~	*57.0*	61.0	Less Than Significant With Mitigation
B40	2	65.0	64.0	~~49.0~~	*55.0*	61.0	Less Than Significant With Mitigation
B41	2	71.0	72.0	~~59.0~~	*60.0*	65.0	Less Than Significant With Mitigation
B42	2	70.0	68.0	~~53.0~~	*58.0*	65.0	Less Than Significant With Mitigation
B43	2	70.0	64.0	~~49.0~~	*55.0*	64.0	Less Than Significant With Mitigation
B44	2	71.0	72.0	~~59.0~~	*63.0*	65.0	Less Than Significant With Mitigation
B45	2	70.0	68.0	~~53.0~~	*61.0*	65.0	Less Than Significant With Mitigation
B46	2	70.0	64.0	~~49.0~~	*58.0*	64.0	Less Than Significant With Mitigation

Cluster No.	Land Use Category	Noise Level (Cat 2 dBA, L_{dn} or Cat 3 dBA, L_{eq})					Impact After Mitigation
		Existing	Unmitigated Freight and LRT Combined	Mitigated Freight and LRT Combined		Impact Threshold[1]	
B47	2	~~71.0~~ *61.7*	68.0	~~58.0~~	*55.0*	~~65.0~~ *59.0*	Less Than Significant With Mitigation
B48	2	~~70.0~~ *58.9*	64.0	~~53.0~~	*52.0*	~~65.0~~ *57.0*	Less Than Significant *With Mitigation*
B49	2	~~70.0~~ *57.5*	60.0	~~49.0~~	*48.0*	~~64.0~~ *56.0*	Less Than Significant *With Mitigation*
B50	2	~~71.0~~ *61.7*	68.0	~~57.0~~	*54.0*	~~65.0~~ *59.0*	Less Than Significant With Mitigation
B51	2	~~70.0~~ *58.9*	64.0	~~53.0~~	*52.0*	~~65.0~~ *57.0*	Less Than Significant *With Mitigation*
B52	2	~~70.0~~ *57.5*	60.0	~~49.0~~	*48.0*	~~64.0~~ *56.0*	Less Than Significant *With Mitigation*
B53	2	62.0	68.0	~~54.0~~	*55.0*	59.0	Less Than Significant With Mitigation
B54	2	59.0	64.0	~~50.0~~	*52.0*	57.0	Less Than Significant With Mitigation
B55	2	58.0	60.0	~~47.0~~	*48.0*	56.0	Less Than Significant With Mitigation
B56	2	62.0	68.0	~~54.0~~	*55.0*	59.0	Less Than Significant With Mitigation
B57	2	59.0	64.0	~~50.0~~	*52.0*	57.0	Less Than Significant With Mitigation
B58	2	58.0	60.0	~~47.0~~	*48.0*	56.0	Less Than Significant With Mitigation
B59	2	62.0	68.0	~~54.0~~	*54.0*	59.0	Less Than Significant With Mitigation
B60	2	59.0	64.0	~~50.0~~	*51.0*	57.0	Less Than Significant With Mitigation
B61	2	58.0	60.0	~~47.0~~	*47.0*	56.0	Less Than Significant With Mitigation
B62	2	62.0	68.0	~~54.0~~	*55.0*	59.0	Less Than Significant With Mitigation
B63	2	59.0	64.0	~~50.0~~	*51.0*	57.0	Less Than Significant With Mitigation
B64	2	58.0	60.0	~~47.0~~	*48.0*	56.0	Less Than Significant With Mitigation
C1	2	61.0	65.0	~~54.0~~	*54.0*	58.0	Less Than Significant With Mitigation
C2	2	59.0	63.0	~~51.0~~	*52.0*	57.0	Less Than Significant With Mitigation
C3	2	57.0	60.0	~~48.0~~	*49.0*	56.0	Less Than Significant With Mitigation
C4	2	61.0	65.0	~~54.0~~	*54.0*	58.0	Less Than Significant With Mitigation
C5	2	59.0	63.0	~~52.0~~	*52.0*	57.0	Less Than Significant With Mitigation
C6	2	57.0	60.0	~~48.0~~	*49.0*	56.0	Less Than Significant With Mitigation
C7	2	61.0	65.0	~~54.0~~	*55.0*	58.0	Less Than Significant With Mitigation
C8	2	59.0	63.0	~~52.0~~	*52.0*	57.0	Less Than Significant With Mitigation

Cluster No.	Land Use Category	Noise Level (Cat 2 dBA, L_{dn} or Cat 3 dBA, L_{eq})				Impact After Mitigation
		Existing	Unmitigated Freight and LRT Combined	Mitigated Freight and LRT Combined	Impact Threshold[1]	
C9	2	57.0	60.0	~~48.0~~ *49.0*	56.0	Less Than Significant With Mitigation
C10	2	61.0	65.0	~~54.0~~ *55.0*	58.0	Less Than Significant With Mitigation
C11	2	59.0	63.0	~~52.0~~ *52.0*	57.0	Less Than Significant With Mitigation
C12	2	57.0	60.0	~~48.0~~ *49.0*	56.0	Less Than Significant With Mitigation
C13	2	61.0	65.0	~~54.0~~ *55.0*	58.0	Less Than Significant With Mitigation
C14	2	59.0	63.0	~~52.0~~ *52.0*	57.0	Less Than Significant With Mitigation
C15	2	57.0	60.0	~~48.0~~ *49.0*	56.0	Less Than Significant With Mitigation
C16	2	61.0	65.0	~~54.0~~ *55.0*	58.0	Less Than Significant With Mitigation
C17	2	59.0	63.0	~~52.0~~ *53.0*	57.0	Less Than Significant With Mitigation
C18	2	57.0	60.0	~~48.0~~ *49.0*	56.0	Less Than Significant With Mitigation
C19	2	61.0	65.0	~~54.0~~ *55.0*	58.0	Less Than Significant With Mitigation
C20	2	59.0	63.0	~~52.0~~ *52.0*	57.0	Less Than Significant With Mitigation
C21	2	57.0	60.0	~~48.0~~ *49.0*	56.0	Less Than Significant With Mitigation
C22	2	62.0	68.0	~~54.0~~ *55.0*	59.0	Less Than Significant With Mitigation
C23	2	59.0	64.0	~~50.0~~ *51.0*	57.0	Less Than Significant With Mitigation
C24	2	58.0	60.0	~~47.0~~ *48.0*	56.0	Less Than Significant With Mitigation
C25	2	61.0	68.0	~~55.0~~ *55.0*	58.0	Less Than Significant With Mitigation
C26	2	59.0	64.0	~~50.0~~ *51.0*	57.0	Less Than Significant With Mitigation
C27	2	57.0	60.0	~~47.0~~ *48.0*	56.0	Less Than Significant With Mitigation
C28	2	61.0	68.0	~~55.0~~ *55.0*	58.0	Less Than Significant With Mitigation
C29	2	59.0	64.0	~~50.0~~ *51.0*	57.0	Less Than Significant With Mitigation
C30	2	57.0	60.0	~~47.0~~ *48.0*	56.0	Less Than Significant With Mitigation
C31	2	61.0	68.0	~~55.0~~ *55.0*	58.0	Less Than Significant With Mitigation
C32	2	59.0	64.0	~~50.0~~ *51.0*	57.0	Less Than Significant With Mitigation
C33	2	57.0	60.0	~~47.0~~ *47.0*	56.0	Less Than Significant With Mitigation
C34	2	61.0	68.0	~~55.0~~ *55.0*	58.0	Less Than Significant With Mitigation
C35	2	59.0	64.0	~~50.0~~ *51.0*	57.0	Less Than Significant With Mitigation

Cluster No.	Land Use Category	Noise Level (Cat 2 dBA, L_{dn} or Cat 3 dBA, L_{eq})				Impact After Mitigation
		Existing	Unmitigated Freight and LRT Combined	Mitigated Freight and LRT Combined	Impact Threshold[1]	
C36	2	57.0	60.0	~~47.0~~ *47.0*	56.0	Less Than Significant With Mitigation
C37	2	61.0	68.0	~~55.0~~ *55.0*	59.0	Less Than Significant With Mitigation
C38	2	59.0	64.0	~~50.0~~ *51.0*	57.0	Less Than Significant With Mitigation
C39	2	57.0	60.0	~~47.0~~ *47.0*	56.0	Less Than Significant With Mitigation
C40	2	61.0	68.0	~~55.0~~ *55.0*	59.0	Less Than Significant With Mitigation
C41	2	59.0	64.0	~~50.0~~ *51.0*	57.0	Less Than Significant With Mitigation
C42	2	57.0	60.0	~~47.0~~ *47.0*	56.0	Less Than Significant With Mitigation
D1	2	61.0	65.0	~~54.0~~ *54.0*	58.0	Less Than Significant With Mitigation
D2	2	59.0	63.0	~~51.0~~ *52.0*	57.0	Less Than Significant With Mitigation
D3	2	58.0	60.0	~~48.0~~ *49.0*	57.0	Less Than Significant With Mitigation
D4	2	61.0	65.0	~~54.0~~ *57.0*	58.0	Less Than Significant With Mitigation
D5	2	59.0	62.0	~~51.0~~ *54.0*	57.0	Less Than Significant With Mitigation
D6	2	58.0	60.0	~~49.0~~ *53.0*	57.0	Less Than Significant With Mitigation
D7	2	57.0	59.0	~~47.0~~ *51.0*	56.0	Less Than Significant With Mitigation
D8	2	65.0	69.0	~~57.0~~ *60.0*	61.0	Less Than Significant With Mitigation
D9	2	65.0	69.0	~~57.0~~ *57.0*	61.0	Less Than Significant With Mitigation
D10	2	65.0	69.0	~~57.0~~ *57.0*	61.0	Less Than Significant With Mitigation
D11	2	65.0	69.0	~~57.0~~ *57.0*	61.0	Less Than Significant With Mitigation
D12	2	65.0	69.0	~~57.0~~ *57.0*	61.0	Less Than Significant With Mitigation
D13	2	66.0	69.0	~~57.0~~ *57.0*	62.0	Less Than Significant With Mitigation
D14	2	66.0	69.0	~~58.0~~ *58.0*	62.0	Less Than Significant With Mitigation
D15	2	61.0	66.0	~~54.0~~ *54.0*	58.0	Less Than Significant With Mitigation
D16	2	61.0	66.0	~~55.0~~ *54.0*	58.0	Less Than Significant With Mitigation
D17	2	59.0	62.0	~~50.0~~ *53.0*	57.0	Less Than Significant With Mitigation
D18	2	58.0	60.0	~~49.0~~ *52.0*	57.0	Less Than Significant With Mitigation
D19	2	57.0	59.0	~~48.0~~ *51.0*	56.0	Less Than Significant With Mitigation
D20	2	59.0	62.0	~~50.0~~ *51.0*	57.0	Less Than Significant With Mitigation

Cluster No.	Land Use Category	Noise Level (Cat 2 dBA, L_{dn} or Cat 3 dBA, L_{eq})				Impact After Mitigation
		Existing	Unmitigated Freight and LRT Combined	Mitigated Freight and LRT Combined		Impact Threshold[1]	
D21	2	59.0	62.0	~~50.0~~	*51.0*	57.0	Less Than Significant With Mitigation
D22	2	59.0	62.0	~~50.0~~	*51.0*	57.0	Less Than Significant With Mitigation
D23	2	62.0	62.0	~~51.0~~	*51.0*	59.0	Less Than Significant With Mitigation
D24	2	61.0	61.0	~~51.0~~	*49.0*	58.0	Less Than Significant With Mitigation
D25	2	61.0	59.0	~~49.0~~	*47.0*	58.0	Less Than Significant With Mitigation
D26	2	61.0	69.0	~~55.0~~	*56.0*	59.0	Less Than Significant With Mitigation
D27	2	59.0	64.0	~~51.0~~	*52.0*	57.0	Less Than Significant With Mitigation
D28	2	57.0	60.0	~~47.0~~	*48.0*	56.0	Less Than Significant With Mitigation
D29	2	61.0	69.0	~~55.0~~	*60.0*	59.0	Significant and Unavoidable
D30	2	59.0	64.0	~~51.0~~	*55.0*	57.0	Less Than Significant With Mitigation
D31	2	57.0	60.0	~~47.0~~	*51.0*	56.0	Less Than Significant With Mitigation
D32	2	62.0	69.0	~~55.0~~	*59.0*	59.0	Significant and Unavoidable
D33	2	59.0	65.0	~~51.0~~	*55.0*	57.0	Less Than Significant With Mitigation
D34	2	57.0	60.0	~~47.0~~	*51.0*	56.0	Less Than Significant With Mitigation
D35	2	62.0	69.0	~~55.0~~	*56.0*	59.0	Less Than Significant With Mitigation
D36	2	59.0	65.0	~~51.0~~	*51.0*	57.0	Less Than Significant With Mitigation
D37	2	57.0	60.0	~~47.0~~	*48.0*	56.0	Less Than Significant With Mitigation
D38	2	62.0	69.0	~~55.0~~	*56.0*	59.0	Less Than Significant With Mitigation
D39	2	59.0	65.0	~~51.0~~	*51.0*	57.0	Less Than Significant With Mitigation
D40	2	57.0	60.0	~~47.0~~	*48.0*	56.0	Less Than Significant With Mitigation
D41	2	63.0	68.0	~~57.0~~	*55.0*	60.0	Less Than Significant With Mitigation
D42	2	61.0	61.0	~~50.0~~	*50.0*	59.0	Less Than Significant With Mitigation
D43	2	61.0	56.0	~~45.0~~	*45.0*	58.0	Less than Significant
D44	2	63.0	68.0	~~58.0~~	*58.0*	60.0	Less Than Significant With Mitigation
D45	2	61.0	61.0	~~51.0~~	*50.0*	59.0	Less Than Significant With Mitigation
D46	2	61.0	56.0	~~46.0~~	*45.0*	58.0	Less than Significant

Cluster No.	Land Use Category	Noise Level (Cat 2 dBA, L_{dn} or Cat 3 dBA, L_{eq})				Impact After Mitigation
		Existing	Unmitigated Freight and LRT Combined	Mitigated Freight and LRT Combined	Impact Threshold[1]	
D47	2	61.0	68.0	~~57.0~~ *57.0*	58.0	Less Than Significant With Mitigation
D48	2	61.0	64.0	~~53.0~~ *52.0*	58.0	Less Than Significant With Mitigation
D49	2	61.0	59.0	~~48.0~~ *46.0*	58.0	Less Than Significant With Mitigation
D50	2	61.0	68.0	~~57.0~~ *55.0*	58.0	Less Than Significant With Mitigation
D51	2	61.0	64.0	~~54.0~~ *51.0*	58.0	Less Than Significant With Mitigation
D52	2	61.0	59.0	~~49.0~~ *46.0*	58.0	Less Than Significant With Mitigation
E1	2	75.0	60.0	~~60.0~~ *60.0*	65.0	Less than Significant
E2	2	58.0	64.0	~~53.0~~ *56.0*	57.0	Less Than Significant With Mitigation
E3	2	57.0	56.0	~~43.0~~ *47.0*	56.0	Less Than Significant With Mitigation
E4	2	58.0	69.0	~~54.0~~ *56.0*	57.0	Less Than Significant With Mitigation
E5	2	57.0	61.0	~~48.0~~ *51.0*	56.0	Less Than Significant With Mitigation
E6	2	57.0	60.0	~~47.0~~ *49.0*	56.0	Less Than Significant With Mitigation
E7	2	57.0	58.0	~~45.0~~ *48.0*	56.0	Less Than Significant With Mitigation
E8	2	57.0	61.0	~~48.0~~ *51.0*	56.0	Less Than Significant With Mitigation
E9	2	57.0	58.0	~~45.0~~ *47.0*	56.0	Less Than Significant With Mitigation
F1	3	60.0	73.0	~~55.0~~ *55.0*	63.0	Less Than Significant With Mitigation
F2	2	64.0	68.0	~~57.0~~ *59.0*	60.0	Less Than Significant With Mitigation
F3	2	64.0	67.0	~~56.0~~ *56.0*	60.0	Less Than Significant With Mitigation
F4	2	64.0	68.0	~~56.0~~ *56.0*	60.0	Less Than Significant With Mitigation
F5	2	57.0	58.0	~~47.0~~ *49.0*	56.0	Less Than Significant With Mitigation
F6	2	57.0	56.0	~~48.0~~ *47.0*	56.0	Less Than Significant With Mitigation
F7	2	63.0	68.0	~~56.0~~ *56.0*	60.0	Less Than Significant With Mitigation
F8	2	57.0	58.0	~~47.0~~ *47.0*	56.0	Less Than Significant With Mitigation
F9	2	57.0	56.0	~~45.0~~ *45.0*	56.0	Less Than Significant With Mitigation
F10	2	61.0	66.0	~~54.0~~ *54.0*	58.0	Less Than Significant With Mitigation
F11	2	61.0	65.0	~~53.0~~ *53.0*	58.0	Less Than Significant With Mitigation
F12	2	59.0	61.0	~~50.0~~ *50.0*	57.0	Less Than Significant With Mitigation

Cluster No.	Land Use Category	Noise Level (Cat 2 dBA, L_{dn} or Cat 3 dBA, L_{eq})				Impact After Mitigation
		Existing	Unmitigated Freight and LRT Combined	Mitigated Freight and LRT Combined	Impact Threshold[1]	
F13	2	57.0	56.0	~~45.0~~ *45.0*	56.0	Less Than Significant With Mitigation
F14	2	61.0	65.0	~~54.0~~ *54.0*	58.0	Less Than Significant With Mitigation
F15	2	59.0	63.0	~~51.0~~ *51.0*	57.0	Less Than Significant With Mitigation
F16	2	57.0	57.0	~~46.0~~ *46.0*	56.0	Less Than Significant With Mitigation
F17	2	61.0	65.0	~~54.0~~ *53.0*	58.0	Less Than Significant With Mitigation
F18	2	57.0	57.0	~~46.0~~ *46.0*	56.0	Less Than Significant With Mitigation
F19	2	56.0	56.0	~~43.0~~ *45.0*	56.0	Less Than Significant With Mitigation
F20	3	60.0	72.0	~~52.0~~ *51.0*	63.0	Less Than Significant With Mitigation
G1	2	60.0	68.0	~~52.0~~ *49.0*	58.0	Less Than Significant With Mitigation
G2	2	57.0	58.0	~~47.0~~ *46.0*	56.0	Less Than Significant With Mitigation
G3	2	57.0	57.0	~~46.0~~ *46.0*	56.0	Less Than Significant With Mitigation
G4	2	56.0	55.0	~~47.0~~ *46.0*	56.0	Less than Significant
G5	2	56.0	67.0	~~52.0~~ *49.0*	56.0	Less Than Significant With Mitigation
G6	2	56.0	66.0	~~50.0~~ *46.0*	56.0	Less Than Significant With Mitigation
G7	2	57.0	71.0	~~54.0~~ *53.0*	56.0	Less Than Significant With Mitigation
G8	2	56.0	64.0	~~49.0~~ *48.0*	56.0	Less Than Significant With Mitigation
G9	2	56.0	62.0	~~47.0~~ *46.0*	56.0	Less Than Significant With Mitigation
G10	2	56.0	56.0	~~45.0~~ *46.0*	56.0	Less Than Significant With Mitigation
G11	2	56.0	64.0	~~51.0~~ *53.0*	56.0	Less Than Significant With Mitigation
G12	2	57.0	66.0	~~54.0~~ *55.0*	56.0	Less Than Significant With Mitigation
G13	2	56.0	63.0	~~50.0~~ *52.0*	56.0	Less Than Significant With Mitigation
G14	2	56.0	61.0	~~49.0~~ *51.0*	56.0	Less Than Significant With Mitigation
G15	2	75.0	64.0	~~51.0~~ *53.0*	65.0	Less than Significant
G16	2	61.0	67.0	~~53.0~~ *47.0*	59.0	Less Than Significant With Mitigation
G17	2	61.0	68.0	~~55.0~~ *48.0*	59.0	Less Than Significant With Mitigation
G18	2	61.0	70.0	~~55.0~~ *50.0*	59.0	Less Than Significant With Mitigation
G19	2	61.0	66.0	~~53.0~~ *47.0*	59.0	Less Than Significant With Mitigation

Cluster No.	Land Use Category	Noise Level (Cat 2 dBA, L_{dn} or Cat 3 dBA, L_{eq})					Impact After Mitigation
		Existing	Unmitigated Freight and LRT Combined	Mitigated Freight and LRT Combined		Impact Threshold[1]	
G20	2	62.0	71.0	~~56.0~~	*52.0*	59.0	Less Than Significant With Mitigation
G21	2	61.0	68.0	~~56.0~~	*49.0*	59.0	Less Than Significant With Mitigation
G22	2	61.0	66.0	~~54.0~~	*47.0*	59.0	Less Than Significant With Mitigation
G23	2	61.0	66.0	~~54.0~~	*47.0*	59.0	Less Than Significant With Mitigation
G24	2	61.0	59.0	~~53.0~~	*49.0*	59.0	Less Than Significant With Mitigation
G25	2	61.0	59.0	~~53.0~~	*49.0*	59.0	Less Than Significant With Mitigation
G26	2	61.0	59.0	~~52.0~~	*48.0*	59.0	Less Than Significant With Mitigation
G27	2	62.0	75.0	~~56.0~~	*53.0*	59.0	Less Than Significant With Mitigation
G28	2	62.0	71.0	~~56.0~~	*51.0*	59.0	Less Than Significant With Mitigation
G29	2	61.0	69.0	~~54.0~~	*49.0*	59.0	Less Than Significant With Mitigation
G30	2	61.0	61.0	~~51.0~~	*50.0*	59.0	Less Than Significant With Mitigation
G31	2	75.0	59.0	~~59.0~~	*48.0*	65.0	Less than Significant
H1	2	70.0	57.0	~~57.0~~	*57.0*	64.0	Less than Significant
H2	2	70.0	54.0	~~54.0~~	*54.0*	64.0	Less than Significant

Source: TAHA, 2022

[1]The impact threshold is compared to (unmitigated freight and LRT combined) and (mitigated freight and LRT combined) noise level to determine impact after mitigation.

Page 3.6-68 and 3.6-69 – Table 3.6-17. Trench Option – Combined Light Rail and Freight Relocation Mitigated Noise Impacts is revised as follows to make the baseline noise level consistent at 162nd Street:

Table 3.6-17. Trench Option – Combined Light Rail and Freight Relocation Mitigated Noise Impacts

Cluster No.	Land Use Category	Noise Level (Cat 2 dBA, L_{dn} or Cat 3 dBA, L_{eq})				Impact After Mitigation
		Existing	Unmitigated Freight and LRT Combined	Mitigated Freight and LRT Combined	Impact Threshold [1]	
B17	2	~~70.0~~ *61.0*	61.0	54.0	~~65.0~~ *58.0*	Less than Significant *With Mitigation*
B18	2	~~70.0~~ *58.0*	57.0	50.0	~~65.0~~ *57.0*	Less than Significant *With Mitigation*
B19	2	~~70.0~~ *57.0*	54.0	48.0	~~64.0~~ *56.0*	Less than Significant
B20	2	~~70.0~~ *61.0*	61.0	54.0	~~65.0~~ *58.0*	Less than Significant *With Mitigation*
B21	2	~~70.0~~ *58.0*	57.0	50.0	~~65.0~~ *57.0*	Less than Significant *With Mitigation*
B22	2	~~70.0~~ *57.0*	54.0	48.0	~~64.0~~ *56.0*	Less than Significant
B47	2	~~71.0~~ *61.7*	62.0	58.0	~~65.0~~ *59.0*	Less than Significant *With Mitigation*
B48	2	~~70.0~~ *58.9*	57.0	53.0	~~65.0~~ *57.0*	Less than Significant *With Mitigation*
B49	2	~~70.0~~ *57.5*	54.0	49.0	~~64.0~~ *56.0*	Less than Significant
B50	2	~~71.0~~ *61.7*	61.0	57.0	~~65.0~~ *59.0*	Less than Significant *With Mitigation*
B51	2	~~70.0~~ *58.9*	57.0	53.0	~~65.0~~ *57.0*	Less than Significant *With Mitigation*
B52	2	~~70.0~~ *57.5*	54.0	49.0	~~64.0~~ *56.0*	Less than Significant

Source: TAHA, 2022

[1]The impact threshold is compared to (unmitigated freight and LRT combined) and (mitigated freight and LRT combined) noise level to determine impact after mitigation.

Page 3.6-88 – The first paragraph on page 3.6-88 and sixth row of Table 3.6-20 is revised as follows:

> The number of residential structures impacted by the potential ground-borne vibration levels due to the operation of the vibratory roller and impact pile driver are summarized by segment in Table and shown graphically in Appendix 3.6-C, Figures 3.6-B1 to 3.6-B33. Appendix 3.6-C shows construction impact contour lines in green for the damage threshold of 0.2 inch/second PPV; a total of ~~133~~*134* structures fall within those contour lines, and they would experience a potentially significant impact related to ground-borne vibration damage during construction. Construction of the Proposed Project would have a significant impact on ~~133~~*134* residential structures related to damage caused by excessive ground-borne vibration levels, and mitigation would be required.

Table 3.6-20. Summary of Proposed Project and Trench Option Construction Ground-borne Vibration Potential Damage Impacts by Segment

From	To	Number of Residential Structures Impacted	
		West of ROW	East of ROW
182nd St	190th St	~~15~~*16*	5

Source: AECOM, 2022
Note: Vibration damage impacts are assessed at the building envelope

Page 3.6-90 – The third paragraph on page 3.6-90 of the Draft EIR is revised as follows:

> The ground-borne vibration impacts for the Trench Option are identified in Table and shown graphically in Appendix 3.6-C, Figures 3.6-B34 to 3.6-B55. The Trench Option would have damage-related construction ground-borne vibration impacts to the same ~~133~~*134* residential structures as the Proposed Project, though it would have lower potential damage impacts near Grant Avenue as it would not construct the relocated freight bridge. Construction of the Trench Option would have a significant impact related to ground-borne vibration levels in excess of FTA's damage levels, and mitigation would be required. Mitigation Measure MM-VIB-1 would require the contractor to prepare a Vibration Control Plan, conduct monitoring to demonstrate compliance with the vibration limits, and reduce vibration impacts as feasible. Implementation of MM-VIB-2 would limit the use of vibratory rollers from occurring within 26 feet of buildings, and vibratory pile drivers from occurring within 22 feet of buildings, as well as require alternative pile driving techniques, such as CIDH, when feasible. With implementation of MM-VIB-1 and MM-VIB-2, construction of the Trench Option would not result in generation of excessive ground-borne vibration. The impact would be **less than significant with mitigation**.

Page 3.6-93 – The final paragraph on page 3.6-93 of the Draft EIR is revised as follows:

> The number of *impacts that would occur from* ~~residences impacted by the potential~~ ground-borne vibration levels due to the operation of the proposed relocated freight and light rail are summarized in Table 3.6-24, along with the worst-case ground-borne vibration level that would occur within each segment of the alignment. *Impacts for relocated freight and for light rail were counted separately, and therefore, Table 3.6-24 represents the total number of impacts, not the total number of affected structures; in some instances, one structure would experience both types of impacts.* Impacts identified ~~for freight impacts~~ from Manhattan Beach Blvd to 160th St would be a result of the freight track re-alignment *only. Impacts identified from 160th Street to Grant Avenue would be a result of the light rail tracks only*. Between 182nd Street and 190th Street, there would be *both light rail- and* freight-related ground-borne vibration impacts on both sides of the Metro ROW. The freight track would be shifted approximately eight to 12 feet to the west. However, this realignment of the freight track is not anticipated to be the primary reason for the impacts on the west side of the ROW, as the existing ground-borne vibration levels in this area likely already exceed FTA criteria. Additionally, this analysis applied a +10 VdB adjustment in this area to account for the observed existing ground-borne vibration levels near the embankment, as described above, so the number of impacts listed in Table 3.6-24 are conservative. Appendix 3.6-C shows the Proposed Project operational impact contour lines in blue and red for freight and light rail, respectively, in Figures 3.6-B1 to 3.6-B33. A total of ~~267~~ *269 impacts would occur* ~~residences fall within those contour lines~~, and occupants would experience a potentially significant annoyance impact during operation.

Page 3.6-94 – The seventh row of Table 3.6-24. Summary of Proposed Project Operational Ground-borne Vibration Annoyance Impacts are revised as follows:

Table 3.6-24. Summary of Proposed Project Operational Ground-borne Vibration Annoyance Impacts

From	To	LRT			Freight		
		Number of Residences Impacted		Worst-Case Vibration Level (VdB)	Number of Residences Impacted		Worst-Case Vibration Level (VdB)
		West of ROW	East of ROW		West of ROW	East of ROW	
182nd St	190th St	~~60~~*61*	70	93	~~35~~*36*	11	87

Source: AECOM, 2022
LRT = light rail transit; VdB = decibel notation; ROW = right-of-way; TC = Transit Center

Page 3.6-95 – The second paragraph and seventh row of Table 3.6-25. Summary of Trench Option Operational Ground-borne Vibration Annoyance Impacts are revised as follows:

> Table 3.6-25 summarizes the impacts for the Trench Option for light rail and freight. Appendix 3.6-C shows operational impact contour lines in blue and red for freight and light rail, respectively, in Figures 3.6-B34 to 3.6-B55. The freight-related impacts would be the same as the Proposed Project, but there would be 12 more impact~~ed residences~~ from light rail operations, for a total of ~~279~~*281* impacts.

Table 3.6-25. Summary of Trench Option Operational Ground-borne Vibration Annoyance Impacts

From	To	LRT			Freight		
		Number of Residences Impacted		Worst-Case Vibration Level (VdB)	Number of Residences Impacted		Worst-Case Vibration Level (VdB)
		West of ROW	East of ROW		West of ROW	East of ROW	
182nd St	190th St	~~60~~*61*	70	93	~~35~~*36*	11	87

Source: AECOM, 2022
LRT = light rail transit; VdB = decibel notation; ROW = right-of-way; TC = Transit Center

Page 3.6-96 – The first bullet point under Mitigation Measure MM-NOI-1: Noise Control Plan is revised as follows:

> - *Construction activities shall be limited to daytime hours, except when nighttime work is necessary due to utility coordination, safety considerations, traffic minimization, or other conditions requiring a nighttime variance. In such cases, the contractor shall obtain a variance from the applicable jurisdiction and demonstrate that noise control measures will maintain noise levels below FTA and local standards.* ~~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 and local standards.~~

Page 3.6-98 – Mitigation Measure MM-VIB-1: Vibration Control Plan is revised as follows:

> Prior to construction, the contractor would prepare a Vibration Control Plan demonstrating how the FTA building damage risk criteria and the FTA vibration annoyance criteria would be achieved. The Vibration Control Plan must be approved by Metro prior to initiating vibration-

generating construction activities *and include the requirement that the contractor, in coordination with Metro and the City of Torrance Public Works Department, shall notify nearby receptors, including businesses near Del Amo Bridge, of pile-driving activities at least 72 hours in advance*. The Vibration Control Plan would include a list of the major pieces of construction equipment that would be used, and the predictions of the vibration levels ~~are~~ *at* the closest sensitive receivers. The contractor would conduct *continuous* vibration monitoring to demonstrate compliance with the vibration limits. Where the construction cannot be performed to meet the vibration criteria, the contractor would investigate alternative means and methods of construction measures to reduce vibration levels as much as feasible.

Page 3.6-105 – The first and second paragraphs of Section 3.6-6.2.1 are revised as follows:

Without mitigation, the Proposed Project would generate ground-borne vibration levels that exceed FTA impact criteria for damage at ~~133~~*134* structures during construction. Construction of the Proposed Project would also result in temporary annoyance impacts to residences along the Metro ROW. MM-VIB-1, MM-VIB-2, and MM-VIB-3 would be implemented, which would reduce the potential for damage impacts, but one impact would remain at a residential structure near Grant Avenue. Mitigation measures would also reduce impacts related to annoyance, but not all equipment types can be feasibly replaced. Therefore, the impact would be **significant and unavoidable** for both damage and annoyance after mitigation.

TRENCH OPTION

Without mitigation, the Trench Option would generate ground-borne vibration levels that exceed FTA impact criteria for damage at ~~133~~*134* structures during construction. While the same structures as the Proposed Project would have potential damage impacts, unlike the Proposed Project, the Trench Option would not require construction of the relocated Grant Avenue freight bridge, thereby avoiding the impacts associated with impact pile driving. Implementation of MM-VIB-1 and MM-VIB-2 would reduce damage impacts to less than significant. Construction of the Trench Option would also result in temporary annoyance impacts to residences along the Metro ROW. MM-VIB-1 and MM-VIB-2 would reduce impacts, but impacts related to annoyance cannot be fully mitigated, and the impact would be **significant and unavoidable** after mitigation.

Page 3.6-105 – The first and second paragraphs of Section 3.6-6.2.2 of the Draft EIR are revised as follows:

Without mitigation, the Proposed Project would generate ground-borne vibration levels that exceed FTA impact criteria for annoyance ~~at 267 residences~~ during operations, *for a total of 269 impacts*. Implementation of MM-VIB-4, MM-VIB-5, and MM-VIB-6 at the locations identified in Table 3.6-35 and Table 3.6-36 would reduce impacts of the Proposed Project to a **less than significant** level.

TRENCH OPTION

Without mitigation, the Trench Option would generate ground-borne vibration levels that exceed FTA impact criteria for annoyance ~~at 279 sensitive receivers~~ during operations, *for a total of 281 impacts*. Implementation of MM-VIB-4, MM-VIB-5, and MM-VIB-6 at the locations identified in Table 3.6-35 and Table 3.6-37 would reduce operation impacts of the Trench Option to a **less than significant** level.

Page 3.6-106 – The first, second, and last rows of Table 3.6-35. Proposed Project and Trench Option Vibration Mitigation Locations – Freight Track are revised as follows:

Table 3.6-35. Proposed Project and Trench Option Vibration Mitigation Locations – Freight Track

Section	Track Structure	Switches/ Crossovers[1]	Resilient Fasteners	Ballast Mat	Spring Frog
Existing Redondo Beach (Marine) Station to Santa Fe Ave	At grade	~~None~~ *Yes*	Not Required	Not Required	Not Required
Santa Fe Ave to Manhattan Beach Blvd	At grade	~~None~~ *Yes*	Not Required	Not Required	Not Required
Hawthorne Blvd to Torrance TC Station	At grade	~~None~~ *Yes*	Not Required	Not Required	Not Required

Source: AECOM, 2022
[1]Vibration mitigation measures are not proposed in sections where vibration impacts do not exist.

Page 3.6-109 – Cumulative impacts of noise are revised within Section 3.6-7.1.1 Construction as follows.

Proposed Project

Construction of the Proposed Project would require heavy earth-moving equipment, generators, cranes, pneumatic tools, and other similar machinery. The existing cumulative noise condition is characterized by existing traffic noise and existing freight noise which was captured by existing ambient noise measurements. Construction noise levels for the Proposed Project would exceed FTA and local noise standards due to the intensive nature of light rail construction activities and the proximity of sensitive land uses to the corridor. Implementation of MM-NOI-1 (Noise Control Plan) would reduce construction noise levels, but there may still be temporary or periodic exceedances of the FTA construction noise criteria and local standards resulting in temporary adverse effects related to construction noise. Similar to the Proposed Project, construction of projected future projects would likely include the use of heavy construction equipment that would generate elevated construction noise levels. Projected future projects would go through their own environmental clearance process and would include mitigation for construction noise to reduce impacts. Related projects within 500 feet of Proposed Project construction could result in a cumulative construction noise impact at sensitive receptors. Related projects listed in Table 3.0-1 that are in the pre-construction or construction phase are anticipated to be completed prior to construction of the Proposed Project. Construction of the South Bay Galleria Development Project ~~is~~ *would be* located within 500 feet and may overlap with construction of the Proposed Project and result in increased construction noise levels from the combination of the two projects. *Additionally, construction of the Mary K. Giordano Regional Transit Center Parking Structure would be within 500 feet of the Torrance TC Station; should the construction of these overlap, increased noise during construction could result from the combination of these two projects.* Although it is not possible to predict which related projects would result in a cumulative construction noise scenario, the construction noise levels associated with the Proposed Project could increase ambient noise levels. Therefore, when combined with noise generated by past, present and probable future projects, the Proposed Project would result in a significant cumulative noise effects during construction, and the Proposed Project's incremental contribution to this impact would be **cumulatively considerable**.

4.11 CHAPTER 3.7 - BIOLOGICAL RESOURCES

Page 3.7-9 – The paragraph under Section 3.7-2.3 Project Features is revised as follows:

As described in Chapter 2, Project Description, a number of features have been incorporated into the project to ensure compliance with the laws, guidelines, or best practices of federal, state, local, and regional agencies. ~~There are no specific project features for biological resources.~~ *The following project features have been developed for biological resources.*

PF-BIO-1. Metro Tree Policy

The Metro Tree Policy outlines Metro's commitment to protecting trees, when possible, or replacing trees removed as a result of Metro construction and maintenance. For non-heritage trees, the replacement ratio defined in the policy is two trees for every tree removed. This policy also prioritizes planting strategies that maximize the use of native species.

Page 3.7.23 – Table 3.7-4. Special-Status Plant and Wildlife Species Potential for Occurrence within the RSA row for the *Polioptila californica* is revised as follows:

Scientific Name	Common Name	Status	Potential for Occurrence (High/Moderate/Low)/ Comments
Polioptila californica	Coastal California gnatcatcher	FT / SSC	Low – No suitable habitat present. *Therefore, the species is not expected to occur.*

Sources: AECOM, 2020; CDFW, 2020; CNPS, 2020.

Page 3.7-22 – The second paragraph is revised as follows:

One special-status plant species, southern tarplant, was determined to have a high potential to occur *and is known to occur within the City of Torrance Open Space Preserve adjacent to the Torrance TC*. The southern tarplant is the only species that has been previously documented within the RSA in the City of Torrance (DTSC, 2008), as discussed in Section 3.7-3.2, and is, therefore, the only species with a high potential of occurrence. Suitable habitat for *southern tarplant is present within the RSA and the Proposed Project footprint, specifically along the maintenance and emergency access path located partially within the established Open Space Preserve on its perimeter* ~~this species is present within the RSA, immediately adjacent to the Proposed Project's parking lot located at the Torrance TC.~~ *Southern tarplant is an annual herb native to coastal southern California (Santa Barbara County through San Diego County) and northern Baja California, typically found in low-elevation grasslands, marshes, and vernal pool habitats (CNPS 2025). Within Los Angeles County, the species persists in fragmented populations (CNPS 2025) with one other population of southern tarplant located within the City of Torrance at Madrona Marsh (Calflora n.d).*

Page 3.7-25 – The analysis under Section 3.7-4.1.1 Construction Impacts is revised as follows:

Less than Significant Impact with Mitigation. Although the RSA is largely urbanized, construction of the Proposed Project could adversely impact special-status plant and wildlife species. The southern tarplant was previously detected during historic survey efforts at the Torrance TC site, which is adjacent to the Proposed Project's surface parking lot~~,~~ and has potential to occur within ~~areas of suitable habitat in the RSA located immediately adjacent to the established Open Space Preserve (Helix, 2014), shown in Figure3.7-15. Potential direct impacts to the southern tarplant may include the loss of individual plants as a result of removal or crushing due to construction related activities (i.e., equipment or employees inadvertently working in an unauthorized area). Potential indirect impacts may include soil and contaminant runoff in the wet season, dust in the dry season during excavation, and the introduction of non-native/invasive species that have potential to degrade habitat and outcompete southern~~

~~tarplant for critical resources. Construction of the Proposed Project would not disturb the Open Space Preserve that has been established adjacent to the Torrance TC, as this area has been designated as a protected space by the City of Torrance. Impacts to southern tarplant would be less than significant through implementation of mitigation measures (described in more detail in Section 3.7-5). MM-BIO-1, General Protection Measures to Avoid and Minimize Impacts on Sensitive Biological Resources, and MM-BIO-4, Pre-Construction Rare Plant Survey, would require the delineation of work limits and buffers, a preconstruction rare plant survey prior to ground disturbance, and on-site monitoring by a qualified botanist.~~

the maintenance and emergency access path located partially in the established Open Space Preserve on its perimeter (see Figure 3.7-15). In 2014, the City of Torrance established this 2-acre Open Space Preserve near Crenshaw Boulevard and 208th Street as mitigation for impacts to approximately 300–400 southern tarplant individuals associated with the Torrance Regional Transit Center Project (Helix, 2014). A mitigation plan was developed to fully mitigate for these impacts through on-site restoration, habitat creation, and long-term preservation. As discussed in the Southern Tarplant Mitigation Plan (Helix 2014) the restoration goals included:

- *Relocation of the southern tarplant population to the existing Open Space Preserve*
- *Maintain the population onsite at a 3:1 ratio (as recommended by CDFW), with a goal of approximately 900-1,200 individuals maturing in each of two of five years following restoration implementation.*
- *Manage the 2-acre property in perpetuity.*

The Proposed Project's maintenance and emergency access path would occupy approximately 7,471 square feet of the 87,036-square-foot Preserve. Direct impacts to southern tarplant would include loss of approximately 7,471 square feet of habitat and mortality of individual plants within the Proposed Project's footprint. Potential indirect impacts could include soil and contaminant runoff during the wet season, dust during the dry season, especially during excavations, and the introduction of non-native or invasive species that could degrade habitat and outcompete southern tarplant for resources.

Although the regional viability of southern tarplant is not expected to be affected—given the population's ecological and geographic isolation from other occurrences—these direct and indirect impacts would reduce the on-site viability of the species by direct reduction in population size and thereby diminishing contributions to the seed bank and weakening long-term population resilience.

Through ongoing coordination with the City of Torrance, Metro understands that the City is in discussions with CDFW regarding relocation of the entire Open Space Preserve. In accordance with MM-BIO-5 (Off-Site Mitigation for Southern Tarplant Habitat), Metro would coordinate with the City and CDFW to identify and evaluate suitable-off-site mitigation sites for southern tarplant habitat, with the goal of establishing, preserving, and managing such habitat in perpetuity at a minimum 3:1 replacement ratio or higher if required by CDFW. If the City elects to relocate and re-establish the entire Preserve, Metro may fulfill its mitigation obligation by funding and implementing a proportional share of the new preserve area under an agreement that includes long-term maintenance provisions and performance standards consistent with MM-BIO-5. If the City does not proceed with relocation, Metro would implement independent offsite mitigation meeting the same performance standards, including securing appropriate land rights, implementing habitat enhancement measures, conducting long-term monitoring, and

establishing an endowment or other funding mechanism. Construction Impacts on southern tarplant would be reduced to less-than-significant levels through implementation of mitigation measures MM-BIO-1 (General Protection Measures), MM-BIO-4 (Pre-Construction Rare Plant Survey), and MM-BIO-5 (Off-Site Mitigation for Southern Tarplant Habitat), detailed in section 3.7-5. In addition to off-site preservation, these measures require delineation of work limits and buffers, pre-construction surveys by a qualified botanist, on-site monitoring, and off-site mitigation for both individuals and habitat.

Page 3.7-26 – The last paragraph on the page is revised as follows:

Through incorporation of MM-BIO-1, MM-BIO-2, MM-BIO-3, MM-BIO-4, *and MM-BIO-5* impacts to special-status plants, wildlife, and other birds protected under the MBTA and CFGC, associated with the construction of the Proposed Project would be **less than significant *with mitigation***.

Page 3.7-27 – The analysis under Section 3.7-4.1.1 Construction Impacts is revised as follows:

TRENCH OPTION

Less than Significant Impact with Mitigation. The Trench Option is similar to the Proposed Project, following the same alignment, but with a lower profile in segments where the light rail would run below street level in an open air trench between Inglewood Ave and 170th Street, as well as under 182nd Street. Potential impacts associated with the Trench Option are similar to the Proposed Project due to their location and similarity in construction methods. With the exception of a few select areas along the alignment, the construction of the Trench Option would require approximately the same land area within the Metro ROW *and would affect the same portion of the Open Space Preserve (7,471 square feet of the 87,036-square-foot Preserve),* ~~to construct~~ and therefore would result in equivalent *direct and* potential *indirect* impacts to special-status plant and wildlife species *as the Proposed Project*. The difference in excavation, structural reinforcement, and duration of construction would require a longer duration of mitigation, but otherwise would be similar in the context of protected habitat and species. The duration of construction of the Trench Option would be approximately two years longer than that of the Proposed Project, but the same mitigation measures taken to mitigate impacts would still be applicable. Therefore, through implementation of MM-BIO-1, MM-BIO-2, MM-BIO-3, ~~and~~ MM-BIO-4, *and MM-BIO-5,* impacts associated with construction of the Trench Option would be **less than significant *with mitigation***.

HAWTHORNE OPTION

Less than Significant Impact with Mitigation. Construction of the Hawthorne Option would take approximately the same amount of time as the Proposed Project. The footprint within the Hawthorne Option segment is a few acres larger than that of the Proposed Project *overall, but would affect the same portion of the Open Space Preserve (7,471 square feet of the 87,036-square-foot Preserve),* ~~but it~~ *and* would ~~still~~ result in equivalent *direct and* potential impacts to special-status plant and wildlife species*, as discussed for the Proposed Project*. In contrast to both the Proposed Project and Trench Option, the Hawthorne Option does not intersect with *public* open space and park areas containing trees or vegetation but does include areas of ornamental trees, though not special-status, located within the center median and east side of Hawthorne Boulevard. Through implementation of MM-BIO-1, MM-BIO-2, MM-BIO-3, ~~and~~ MM-BIO-4, *and MM-BIO-5* impacts associated with construction of the Hawthorne Option would be **less than significant *with mitigation***.

Page 3.7-28 – The analysis under Section 3.7-4.1.2 Operational Impacts is revised as follows:

Less than Significant Impact with Mitigation. Maintenance activities along the Metro ROW may potentially result in both temporary direct and indirect impacts to bird species protected under the MBTA and CFGC if trees and vegetation that have potential to support nesting birds during the breeding season were removed or disturbed during the breeding season. Potential direct impacts may subsequently cause nest abandonment (and thus loss of young), nest failure, or direct mortality of individuals. However, Metro routine maintenance during operation does not typically disturb vegetation or trees that supports nesting birds.

~~Potential~~ *If the City does not proceed with relocation of the Open Space Preserve, maintenance activities could result in* indirect impacts to southern tarplant individuals *and habitat* ~~present~~ within the Open Space Preserve adjacent to the Torrance TC*. These impacts could* ~~may~~ occur as a result of oil and fluid run-off from the Proposed Project's surface parking lot ~~degrading~~ *and from use of the maintenance and emergency egress path, which may degrade* habitat and soil quality *and cause die-off of southern tarplant individuals, including the seed bank*. However, ~~although~~ *no impacts are expected because* the Proposed Project parking lot would be impervious~~, it would~~ *and* ~~not contribute to stormwater runoff, since the site~~ would be designed with best management practices to retain stormwater on-site (see Section 3.10, Hydrology and Water Quality)*. These features and best management practices would also apply to the Proposed Project's maintenance and emergency egress path*. *In addition, if the City does not relocate the Preserve, Metro would implement stand-alone off-site mitigation consistent with MM-BIO-5 (Off-Site Mitigation) to offset the affected portion of southern tarplant habitat.* ~~This~~ *These* factor*s*, ~~and~~ *together* with implementation of MM-BIO-1 *(General Protection Measures)*, would *avoid or minimize degradation of habitat and soil quality, thereby preventing substantial adverse effects on southern tarplant during operation. Therefore, with implementation of MM-BIO-1 and MM-BIO-5, operation of the Proposed Project would* result in **less than significant impacts *with mitigation*** to southern tarplant.

TRENCH OPTION

Less than Significant Impact with Mitigation. Within the Trench Option segment, the potential impacts would be similar to the Proposed Project. Metro routine maintenance during operation does not typically disturb vegetation or trees that supports nesting birds.

Like the Proposed Project*, if the City does not proceed with relocation of the Open Space Preserve,* potential indirect impacts to southern tarplant ~~individuals present within the Open Space Preserve adjacent to the Torrance TC~~ may occur as a result of oil and fluid run-off from the ~~Proposed Project~~ *proposed* surface parking lot *and the maintenance and emergency access path; this runoff could* ~~degrading~~ *degrade* habitat and soil quality *and cause die-off of southern tarplant individuals, including the seed bank*. However, the ~~Proposed Project~~ *project* parking lot *and maintenance and emergency egress path* would be impervious,~~ it~~ *and* would not contribute to stormwater runoff, since ~~the site~~ *both the parking lot and the maintenance and emergency egress path* would be designed with best management practices to retain stormwater on-site (see Section 3.10, Hydrology and Water Quality). *In addition, if the City does not relocate the Preserve, Metro would implement stand-alone off-site mitigation consistent with MM-BIO-5 to offset the affected portion of southern tarplant habitat* ~~This~~*These* factor*s*, ~~and~~ *together* with implementation of MM–BIO-1, *would avoid or minimize degradation of habitat and soil quality, preventing substantial adverse effects on southern tarplant during operation. Therefore,*

operation of the Trench Option would result in **less than significant impacts *with mitigation*** to southern tarplant.

HAWTHORNE OPTION

Less than Significant Impact. Within the Hawthorne Option segment, the potential impacts would be similar to the Proposed Project. Metro routine maintenance during operation does not typically disturb vegetation or trees that supports nesting birds.

Like the Proposed Project, *if the City does not proceed with relocation of the Open Space Preserve,* potential indirect impacts to southern tarplant ~~individuals present within the Open Space Preserve adjacent to the Torrance TC~~may occur as a result of oil and fluid run-off from the ~~Proposed Project~~ *project's* surface parking lot *and maintenance and emergency egress path, which could* ~~degrading~~ *degrade* habitat and soil quality *and cause die-off of southern tarplant individuals, including the seed bank*. However, *both* the ~~Proposed Project~~ parking lot *and the maintenance and emergency access path* would be impervious *and would be designed with best management practices to retain stormwater on-site (see Section 3.10, Hydrology and Water Quality)*. ~~This~~ *These* factor*s*, *together* ~~and~~ with implementation of MM–BIO-1*,* would *avoid or minimize degradation of habitat and soil quality, thereby preventing substantial adverse effects on southern tarplant during operation. Therefore, with implementation of MM-BIO-1 and MM-BIO-5, operation of the Hawthorne Option would* result in **less than significant impacts *with mitigation*** to southern tarplant.

Page 3.7-30 – The analysis under Section 3.7-4.3.1 Construction Impacts is revised as follows:

No Impact. Construction of the Proposed Project is not expected to adversely impact state or federally protected wetlands through direct removal, filling, hydrological interruption, or other means. Wetland features previously identified at the Torrance TC site have since been disturbed by other projects, and mitigation by another project consisted of establishment of a two-acre Open Space Preserve that ~~would~~ support*s* the *appropriate hydrological function for the* on-site population of southern tarplant (see discussion in Section 3.7-3.3). *Even without implementation of mitigation, the Proposed Project's maintenance and emergency egress path within this Open Space Preserve is not expected to adversely impact any state or federally protected wetlands because the path would not alter existing hydrology or encroach into areas that meet the definition of wetlands under state or federal law.* The Pioneer Basin is located within the RSA but would not be impacted by construction activities as it is situated on a bluff well above (in elevation) the Metro ROW. In addition, no impacts are anticipated to the City of Torrance storm water retention basins (i.e., sumps) as these areas are located adjacent to, and outside of, the RSA. Therefore, construction of the Proposed Project would result in **no impact**.

Page 3.7-32 – The analysis under Section 3.7-4.5.1 Construction Impacts is revised as follows:

Less than Significant Impact with Mitigation. ~~**No Impact.**~~ Construction of the Proposed Project ~~is not expected to~~ *would have the potential to* conflict with local policies or ordinances protecting biological resources. Relevant local objectives and policies are described in Section 3.7-1.3 (and include the City of Torrance General Plan's Open Space and Habitat Objectives and Policies, Dominguez WPPM, and the City of Torrance Street Tree Master Plan). As noted in Section 3.7-1.3, the City of Torrance has applicable open space objectives and policies. ~~but construction of the Proposed Project would not infringe on key open space areas identified for protection and preservation by the City.~~ The Open Space Preserve established for southern tarplant protection*.* is located immediately adjacent to the Proposed Project footprint

(specifically, the surface parking lot) *and the maintenance and emergency egress path would occupy approximately 7,471 square feet of the 87,036-square-foot Preserve. This encroachment would conflict with the Preserve's open space and habitat objectives and therefore would represent a significant impact before mitigation. However, consistent with MM-BIO-5, impacts would be reduced to a less-than-significant level through either (1) participation in and funding of the City's relocation and re-establishment of the Preserve under an agreement that meets the mitigation measure's performance standards, or (2) implementation of an independent off-site mitigation preserve meeting the same performance standards, including long-term management and funding provisions. MM-BIO-1 (General Protection Measures) would also be implemented to avoid and minimize temporary construction-related effects within the Preserve.*~~; however, construction related activities will not occur within the boundaries of the Open Space Preserve and no impacts are anticipated.~~

The Dominguez WMMP was developed to manage and enhance water quality and habitats within the watershed, of which construction of the Proposed Project is not expected to significantly impact. The Street Tree Master Plan (City of Torrance, 2015f) was created to enhance and preserve the City's trees by having a set list of recommended trees that would best fit each area of the city. Although loss of non-native trees may occur within the Metro ROW as a result of construction, the Proposed Project alignment does not overlap with any of the eight Special Designated Areas for Tree Conservation and Protection, as designated by the City of Torrance. In addition, local regulations and ordinances do not apply to any existing Metro-owned property. Therefore, no City ordinances require that the Proposed Project replace impacted trees within the Metro ROW.

The Cities of Redondo Beach and Lawndale do not have applicable objectives and/or policies protecting biological resources, including tree preservation ordinances. Therefore, although the Proposed Project could cause a loss of some open space and the loss of some non-native, ornamental trees in the Cities of Redondo Beach and Lawndale, it would not conflict with any relevant policy adopted by those cities. ~~Therefore, construction of the Proposed Project would result in **no impact**.~~

*With implementation of MM-BIO-1 and MM-BIO-5, conflict with local policies or ordinances protecting biological resources, specifically impacts to the established Open Space Preserve, would be reduced to **less than significant with mitigation**.*

TRENCH OPTION

Less than Significant Impact with Mitigation. ~~**No Impact.**~~ Similar to the Proposed Project, construction of the Trench Option ~~is not expected to~~ *has the potential to* conflict with local policies or ordinances *protecting the established Open Space Preserve for the southern tarplant*, as it would be constructed in the same location. Therefore, *conflicts with local policies or ordinances protecting biological resources, specifically impacts to the established Open Space Preserve, could result in a significant impact before mitigation. With implementation of MM-BIO-1 and MM-BIO-5, construction of the Trench Option would have a **less than significant impact with mitigation**.* ~~construction of the Trench Option would result in **no impact**.~~

HAWTHORNE OPTION

Less than Significant Impact with Mitigation. ~~**No Impact.**~~ Similar to the Proposed Project, the Hawthorne Option ~~is not expected to~~ *has the potential to* conflict with local policies or ordinances *protecting the established Open Space Preserve for the southern tarplant*, as it would

be constructed in the same cities and under the same local policies and ordinances. ~~Therefore,~~ *With implementation of MM-BIO-1 and MM-BIO-5, construction of the Hawthorne Option would not conflict with local policies or ordinances protecting biological resources, specifically impacts to the established Open Space Preserve, and this impact would be* ***less than significant with mitigation****.* ~~construction of the Hawthorne Option would result in **no impact**.~~

3.7-4.5.2 Operational Impacts

Less than Significant Impact with Mitigation. ~~**No Impact.**~~ The operational activities associated with the Proposed Project ~~are not expected to~~ *could* conflict with ~~any of the~~ local policies or ordinances discussed in Section 3.7-1.3. Operation of the Proposed Project is not expected to directly or indirectly impact protected trees, as the Proposed Project alignment does not occur within any of the eight Special Designated Areas for Tree Conservation and Protection, designated by the City of Torrance. In addition, local regulations and ordinances do not apply to the existing Metro-owned property. As a result, any tree trimming and thinning activities associated with operation of the Proposed Project would not need to comply with tree protection ordinances. Operation of the Proposed Project ~~will~~ would not occur within open space areas established for protection by the City of Torrance, *except for* ~~including~~ the two-acre Open Space Preserve for southern tarplant~~,~~. *Use of the maintenance and emergency access path within the Preserve would represent a potential conflict with the Preserve's open space and habitat objectives, which would constitute a significant impact before mitigation. However, consistent with MM-BIO-5 (Off-Site Mitigation for Southern Tarplant), this impact would be mitigated prior to operation through either (1) Metro's participation in and funding of the City's relocation and re-establishment of the Preserve under an agreement that meets the mitigation measure's performance standards, or (2) implementation of an independent off-site mitigation project meeting the same performance standards, including long-term management and funding provisions. Because MM-BIO-5 would be implemented during construction, the required mitigation would be in place before operation begins. If the City does not relocate the Preserve, implementation of MM-BIO-1 (General Protection Measures) together with MM-BIO-5, would ensure operational impacts related to conflicts with local policies or ordinances protecting biological resources are reduced to a less-than-significant level.* ~~and will~~ *Operation of the Proposed Project would* not jeopardize water quality and habitats within the watershed of the overarching Dominguez WMMP. *With implementation of MM-BIO-1 and MM-BIO-5, potential operational conflicts with local policies or ordinances protecting biological resources, specifically, impacts to the established Open Space Preserve, would be* ***less than significant with mitigation****.* ~~Therefore, the operation of the Proposed Project would result in **no impact**.~~

TRENCH OPTION

Less than Significant Impact with Mitigation. ~~***No Impact.***~~ Similar to the Proposed Project, operation of the Trench Option ~~is not expected *to*~~ *has potential to* conflict with local policies or ordinances, as it would operate along the same alignment in the same operating pattern. *Like the Proposed Project, with implementation* of *MM-BIO-1 and MM-BIO-5, impacts associated with conflicts with local policies or ordinances protecting biological resources, specifically, impacts to the established Open Space Preserve, would be reduced to* ***less than significant with mitigation****.* ~~Therefore, operation of the Trench Option would result in **no impact**.~~

HAWTHORNE OPTION

Less than Significant Impact with Mitigation**.** ~~**No Impact.**~~ Similar to the Proposed Project, operation of the Hawthorne Option ~~is not expected to~~ *could* conflict with local policies or

ordinances, as it would be operated within the same policy context and with the same operating pattern. *Like the Proposed Project, with implementation of MM-BIO-1 and MM-BIO-5, impacts associated with conflicts with local policies or ordinances protecting biological resources, specifically, impacts to the established Open Space Preserve, would be reduced to* ***less than significant with mitigation****.* ~~Therefore, operation of the Trench Option would result in **no impact**.~~

Page 3.7-34 – MM-BIO-1 is revised as follows:

Prior to the initiation of construction activities, construction work limits shall be defined and marked (i.e., by caution tape, temporary fencing, etc.). All temporary fencing or other markers must be clearly visible to construction personnel.

Prior to and during construction, a qualified Biologist, selected by Metro, shall confirm that the outer perimeter of the construction work limits, *fencing, and erosion control measures are properly installed and shall monitor compliance with these measures within and adjacent to the Open Space Preserve* ~~is not within 50 feet of any area where native vegetation and sensitive habitats occur, specifically, the Open Space Preserve established as part of the Torrance TC Project by the City of Torrance and adjacent to the Proposed Project's Torrance TC Station~~. No native vegetation removal or grading shall occur ~~within areas designated for avoidance~~ *within any remaining areas of the Open Space Preserve*. Fenced impact limits shall include erosion control measures to minimize erosion and siltation during initial vegetation clearing/removal and construction through the use of silt fencing, siltation basins, gravel bags, or other controls necessary to stabilize the soil in cleared or graded areas. Erosion control measures would be installed prior to the onset of vegetation clearing/removal. These measures would be maintained in good repair until the completion of construction. Vegetation clearing/removal during routine maintenance shall also include similar erosion control measures. Specific work areas within the Torrance TC Station site~~, including the surface parking lot,~~ adjacent to *portions of* the Open Space Preserve *that remain in place, if the City of Torrance does not relocate the Preserve to a different site prior to construction,* shall include specific erosion and run-off control measures necessary to ensure no contaminants enter the *fenced impact limits of the* Open Space Preserve and consequently degrade *any remaining* habitat for the southern tarplant. These erosion and run-off control measures shall be implemented long-term per Regional *Water Quality Control Board* ~~R~~*requirements* to ensure the continued protection of the Open Space Preserve and quality of habitat within. *These measures are in addition to, and not in lieu of, the compensatory mitigation requirements of MM-BIO-5, which shall be implemented prior to any ground-disturbing activities within the Southern Tarplant Open Space Preserve.*

Page 3.7-34 – The second paragraph of Mitigation Measure MM-BIO-2 is revised as follows:

A pre-construction nesting bird survey shall be conducted by a qualified biologist (i.e., a biologist familiar and experienced with the identification and life histories of wildlife and plant species in southern California) within *72 hours, or as determined by the qualified biologist,* ~~4 days (96 hours)~~ prior to the start of construction activities, to determine whether active nests are present within or directly adjacent to the construction zone. Nests found shall be recorded.

Page 3.7-35 – Mitigation Measure MM-BIO-3 is revised as follows:

Prior to demolition permit issuance and in preparation for ~~demolition both bridges at Grant Avenue and~~ *activities at* the Del Amo Boulevard *bridge and for other bridge modifications*, a bat roost habitat assessment shall be performed by a qualified biologist (i.e., a biologist familiar with

bat identification and ecology in southern California) at each location in order to identify both potential day time and nighttime roosting activity and maternity roosts, for bat species with potential to occur. The bat roost habitat assessment shall be conducted during the spring/summer months between April 1 through August 31 to most effectively identify maternity roost activity. Signs indicating active use by bat species may include guano, urine staining, and audible vocalizations; and shall be recorded upon observation for inclusion in a summary report.

If active maternity roosts are identified, consultation shall occur with CDFW and a bat mitigation plan shall be prepared in advance of construction that shall include measures to avoid, minimize, and mitigate project impacts to bat species per conversations with, and recommendations from, CDFW. The bat mitigation plan ~~shall~~ *may* include bat exclusion measures to be implemented outside the California maternity season (the maternity season is defined as April 1 through August 31 in southern California) in order to prevent potential direct impacts to individuals. During the maternity season, a recommended buffer shall be implemented around any active maternity roosts, and no project related activities shall occur within the buffer until a biologist has determined that the roost is no longer in use. In addition, the bat mitigation plan shall require the replacement of lost habitat associated with demolition of the bridges and shall include mitigation addressing loss of roosts; this replacement should be on site when feasible and off site only when on site replacement is not feasible. The mitigation plan shall include required monitoring of mitigation to ensure the success of the proposed mitigation measures.

Page 3.7-34 – Mitigation Measure MM-BIO-4 is revised as follows:

Prior to construction, *if the Open Space Preserve has not been fully relocated and portions of the Preserve remain,* suitable habitat in the portion of the RSA immediately adjacent to the Open Space Preserve shall be visually surveyed on foot by a qualified botanist (i.e., a botanist familiar with southern tarplant identification) in order to identify potential southern tarplant presence. Surveys should be conducted during the appropriate blooming period for optimal identification (defined as May – November).

If individuals are detected, individuals shall be flagged, and this area shall be clearly marked for avoidance through visible signage and fencing. A buffer zone shall be established of at least 50 feet from the outermost perimeter of the population in order to sufficiently eliminate potential disturbance to the plants from human activity and any other potential sources of disturbance including trampling, erosion, and dust. No vegetation removal, grading, or other earthwork shall occur within areas designated for avoidance. *These avoidance requirements apply to southern tarplant individuals outside the permanent impact footprint of the Project within the Open Space Preserve. Impacts to individuals within the permanent Project footprint shall instead be addressed through the compensatory mitigation requirements of MM-BIO-5.*

A qualified botanist shall perform bi-weekly (twice per week) site visits, or at a frequency necessary to ensure protection *of any remaining areas* of the Open Space Preserve, during all construction activities occurring immediately adjacent to *any remaining areas of* the Open Space Preserve to ensure construction activities remain within the designated, and delineated, approved construction area; and that construction fencing, and other boundary demarcations remain in the appropriate condition

Page 3.7-36 – After the second paragraph on page 3.7-36, the following text is added:

MM-BIO-5. Off-site Mitigation for Southern Tarplant Habitat

Prior to construction, Metro shall coordinate with the City of Torrance and CDFW to identify and evaluate one or more suitable off-site mitigation sites for southern tarplant habitat. The goal of this effort is to mitigate the permanent loss of southern tarplant habitat through the establishment, preservation, and long-term management of suitable off-site mitigation habitat.

Metro shall ensure that mitigation occurs at a minimum 3:1 ratio for habitat area, or at a higher ratio if required by CDFW. A site-specific biological assessment, prepared by a qualified botanist (i.e., a botanist familiar with identification, survey, and management of southern tarplant), shall demonstrate that the selected mitigation site(s) have appropriate soil, hydrology, and ecological conditions to support self-sustaining, long-term tarplant populations.

It is Metro's understanding that the City of Torrance is currently evaluating the relocation and re-establishment of the entire Open Space Preserve to the Elm Water Yard in the City of Torrance. If the City elects to proceed with that relocation, Metro may satisfy its mitigation obligation by entering into an agreement with the City to fund and implement a proportional share of the new preserve area. This agreement must include provisions for a non-wasting endowment or other long-term funding mechanism sufficient to cover Metro's proportional share of perpetual management costs, and must include performance standards equivalent or greater than those described in this mitigation measure for Metro's proportional share.

If the City of Torrance opts not to relocate and re-establish the Open Space Preserve, Metro shall implement an independent off-site mitigation project that achieves the same performance standards for habitat value and long-term viability, including securing a conservation easement, deed restriction, or other legally enforceable land protection instrument; implementing habitat enhancement measures; conducting long-term monitoring, and establishing a non-wasting endowment or other funding mechanism sufficient to cover Metro's proportional share of perpetual management costs. Metro shall make a reasonable, documented effort to implement the off-site mitigation within the City of Torrance.

If no appropriate off-site mitigation site can be identified within the City of Torrance, Metro shall identify and evaluate one or more suitable sites outside the City, such as an existing preserve that includes the same species of southern tarplant, that achieve the same habitat value and long-term viability standards as determined by a qualified botanist.

A qualified botanist shall also prepare a Southern Tarplant Translocation/Enhancement Plan in consultation with CDFW that includes feasible and achievable performance standards. The plan shall include, but is not limited to, methods and sourcing guidelines for seed collection (to occur for a minimum of two years); best management practices for planting and invasive species control; monitoring protocols, and a schedule of implementation activities. The Translocation Plan/Enhancement shall be finalized prior to any ground-disturbing activities that could affect the Southern Tarplant Open Space Preserve.

If, after a reasonable and documented effort, no suitable off-site mitigation site can be identified or implemented within or outside the City of Torrance, Metro shall consult with CDFW to identify an alternative mitigation strategy that achieves equivalent biological value and long-term viability. This may include payment of an in-lieu fee to a CDFW-approved land management entity, provided that the entity commits to establishing, preserving, and managing southern tarplant habitat in perpetuity at a minimum ratio of 3:1 or higher, consistent with the performance standards described above.

Pages 3.7-36 through 3.7-37 – Section 3.7-7 Cumulative Impacts is revised as follows:

3.7-7.1 Proposed Project

Historically, development and rapid urbanization has been occurring in the surrounding region since the late 1800s. Continued development relating to infrastructure improvement, housing construction, and other community needs is regularly, and frequently, occurring. There is an existing cumulative impact related to biological resources as a result of the highly urbanized setting and both historic and present development throughout the region. Today, the region is an established metropolitan setting consisting of a mostly highly urbanized landscape including both industrial and residential communities, resulting in an existing impact to the biological setting of the RSA. The Proposed Project could contribute to the existing cumulative impact.

The analysis of biological resources in Section 3.7-4 identifies less than significant impacts after mitigation resulting from construction of the Proposed Project. *While the Proposed Project could contribute to significant impacts on biological resources in the region, this incremental contribution would not be cumulatively considerable due to the implementation of mitigation measures. With respect to southern tarplant, the Proposed Project could result in direct impacts to individual southern tarplant plants and associated habitat, as well as encroachment into a portion of the City of Torrance's designated Southern Tarplant Open Space Preserve. These impacts could contribute to cumulatively significant regional impacts on special-status plant species and on locally protected open space resources. However, implementation of Mitigation Measure MM-BIO-5 would ensure that impacts to the southern tarplant and Open Space Preserve are mitigated through the establishment, preservation, and long-term management of off-site southern tarplant habitat at a minimum 3:1 ratio. If feasible, Metro may satisfy this requirement through coordination with the City of Torrance to fund a proportional share of the relocation and re-establishment of the Open Space Preserve. If the City elects not to pursue relocation, Metro would independently implement a stand-alone off-site mitigation project that meets the same performance standards for habitat value and long-term viability.* There efforts, in combination with Implementation of mitigation measures MM-BIO-1 through MM-BIO-4, would avoid or mitigate impacts to southern tarplant, nesting birds, and bats. Operation of the Proposed Project would have less than significant impacts to biological resources. Therefore, the Proposed Project's incremental contribution to cumulatively significant impacts on biological resources*, including both species-level and preserve-level,* effects would not be cumulatively considerable during construction or operation.

3.7-7.2 Trench Option

The Trench Option would be constructed in the same location as the Proposed Project using similar equipment, methods, and timeframe as the Proposed Project. While it would require deeper and more extensive excavation and construction of structures than the Proposed Project, with implementation of mitigation measures MM-BIO-1 through ~~MM-BIO-4~~ *MM-BIO-5*, these activities are not anticipated to cause a greater disturbance to biological resources than the Proposed Project. The Trench Option's potential for cumulative effects would largely be similar to that that of the Proposed Project. Similarly, the Trench Option would operate along the same alignment and in the same operating pattern as the Proposed Project. Therefore, the Trench Option's incremental contribution to cumulatively significant impacts on biological resources would not be cumulatively considerable during construction or operation.

3.7-7.3 Hawthorne Option

The Hawthorne Option would be constructed along Hawthorne Boulevard, a built-out major arterial largely devoid of any natural or biological resource, using similar equipment, methods, and timeframe as the Proposed Project. While it would require more construction of structures than the Proposed Project, with implementation of mitigation measures MM-BIO-1 through ~~MM-BIO-4~~ *MM-BIO-5*, these activities are not anticipated to cause a greater disturbance to biological resources than the Proposed Project. The Hawthorne Option would have the same operating pattern as the Proposed Project. The Hawthorne Option's potential for cumulative effects would largely be similar to that that of the Proposed Project. Therefore, the Hawthorne Option's incremental contribution to cumulatively significant impacts on biological resources would not be cumulatively considerable during construction or operation.

4.12 CHAPTER 3.8 - GEOLOGY AND SOILS

Page 3.8-7 – Section 3.8-2.5 under the heading PF-GEO-1. Metro Geotechnical Design Standards is revised to include the following first paragraph:

Prior to construction, Metro will complete soil investigations, including examination of any potential sinkholes by the geotechnical engineer of record, to inform site-specific design and construction measures.

Page 3.8-21 – Section 3.8-3.12- is revised as follows:

3.8-3.12 Subsidence~~, and~~ Settlement*, and Collapsible Soils*

Subsidence (other than that caused by liquefaction) may occur due to earthquake shaking, removal of groundwater, and/or removal of hydrocarbons from the underlying soil material.

Subsidence may occur in unconsolidated soils during earthquake shaking as the result of a more efficient rearrangement of existing individual soil particles. Subsidence of sufficient magnitude to cause significant structural damage is normally associated with rapidly deposited alluvial materials or improperly compacted fill.

Collapsible soils consist predominantly of sand- and silt-size particles arranged in a loose "honeycomb" structure. This loose structure is held together by small amounts of water-softening cementing agents, such as clay or calcium carbonate. When the soil becomes wet, these cementing agents soften and the honeycomb structure collapses and generates ground settlement. Collapsible soil can also contribute to sinkholes.

According to the City of Redondo Beach Geological Hazards section of the General Plan (1993f), no areas were identified as being prone to subsidence. In addition, subsidence occurring from withdrawal of hydrocarbons in the City of Redondo Beach is nonexistent. *According to the City of Redondo Beach's 2024 Draft Program Environmental Impact Report for their Focused General Plan Update, the soil within the city is generally not susceptible to collapse due to the granular nature of the soils and lack of clay (2024).*

According to the City of Lawndale Safety Element (~~2015~~*2023*), the city does not *have any historic or current U.S. Geological Survey-recorded subsidence, and the risk for collapsible soils is low.* ~~contain areas of rapidly deposited alluvial material, and therefore the risk for subsidence is low.~~

Page 3.8-27 – The evaluation of the Trench Option is revised as follows:

Less Than Significant Impact. The construction of a trench requires deeper excavations which, during a seismic event, could potentially increase the risk of loss, injury, or death as a result of trench collapses or cave-ins. The potential for strong seismic ground shaking would exacerbate

these risks. Generally, to prevent these issues, sloping or benching the excavation, shoring the trench walls with support would be implemented. *Shoring would be monitored for lateral and vertical movement during construction.* Three types of walls for the proposed Trench Option are proposed: U walls, secant pile walls without struts, and secant pile walls with struts. U walls may be constructed using bottom-up construction with excavating the soil behind the walls. The other two types of secant pile walls would be constructed using top-down construction method. The secant pile wall would have series of closely spaced cast-in-drilled-hole piles with overlapping soil-cement piles. This secant pile wall system would first be constructed (using top-down construction technique) and then the trench excavations would be performed. This would provide a safe working environment to construction workers. The U walls can be constructed with proper back-sloping to avoid any slope failures due to seismic ground shaking. The Trench Option would comply with PF-GEO-1, Metro Geotechnical Design Standards which would ensure that during the design phase, seismically induced earth pressures would be incorporated in the design to prevent the failures due to seismic ground shaking. For these reasons and the intermittent and temporary nature of construction work and the relative rarity of strong seismic events, Trench Option would have a **less than significant impact** related to risk of loss, injury, or death involving strong seismic ground shaking.

Page 3.8-32 – The text under Section 3.8-4.6.1 is revised as follows:

Less Than Significant Impact. As previously discussed, the Proposed Project footprint is not located within a CGS mapped liquefaction zone. *The Proposed Project footprint, in general, is in a relatively low relief area and the nearest CGS mapped landslide zone is over 1.5 miles west and south; see Figure 3.8-4. Based on prior studies and existing geotechnical data, there is a low potential for subsidence and naturally occurring collapsible soils within the project area.* Therefore, *the project is not located on a geologic unit or soil that is unstable or would become unstable as a result of the project, and resulting* impacts associated with unstable soils ~~and their consequences~~ are considered minimal. *However, deep excavations for piles could potentially encounter unconsolidated or water-saturated soils.* ~~However, p~~*P*reviously performed geotechnical investigation indicated shallow groundwater (this could be perched water) was recorded in the northern area of the Proposed Project footprint, which would be further evaluated during the design phase with incorporation of PF-GEO-1. *PF-GEO-1 would require a site-specific geotechnical investigation to assess the subsurface conditions and current groundwater depth to conclude the landslide, lateral spreading, subsidence, liquefaction, and collapse risk, as well as seismic risk solutions such as deep foundations and ground improvements. As part of the geotechnical investigation, the site-specific soil types would be identified and appropriate ground-stabilization measures would be incorporated into the design and construction of the project, to ensure that the project would not result in impacts related to unstable soils.* ~~In addition, the Proposed Project footprint, in general, is in a relatively low relief area and the nearest CGS mapped landslide zone is over 1.5 miles west and south; see Figure 3.8-4.~~ Given the intermittent and temporary nature of construction work and the relative rarity of seismic events, the occurrence of seismic ground shaking resulting in liquefaction, lateral spreading, landslides, or seismically induced slope failures during construction of the Proposed Project is unlikely. In addition, there is no evidence of groundwater pumping within or around the Proposed Project footprint that can cause ground subsidence, although this will be confirmed and evaluated during the final design phase.

~~Based on shallow groundwater recorded in the northern area of the Proposed Project footprint, the coarse-grained soils may be susceptible to liquefaction. PF-GEO-1 would require a site-specific geotechnical investigation to assess the subsurface conditions and current groundwater depth to~~

~~conclude the landslide, lateral spreading, subsidence, liquefaction, and collapse risk, as well as seismic risk solutions such as deep foundations and ground improvements.~~ Therefore, the construction impacts for Proposed Project would be **less than significant** on unstable soils as a result of landslides, lateral spreading, subsidence, liquefaction, or collapse.

4.13 CHAPTER 3.9 - HAZARDOUS MATERIALS

Page 3.9-10 – Project Feature PF-HHM-1 is revised as follows:

PF-HHM-1. Handling, Storage, and Transport of Hazardous Materials and Wastes

Prior to the start of construction, the contractor would provide Metro with a hazardous waste and hazardous materials management plan, such as a plan defined in Title 19 CCR, or a Spill Prevention, Control, and Countermeasure Plan. The plan will be completed to Metro contractor specifications and will comply with the SWRCB Construction Clean Water Act Section 402 General Permit conditions and requirements for transport, labeling, containment, cover, and storage of hazardous materials during construction and operation. The plan will identify the responsible parties and outline procedures for hazardous waste and hazardous materials handling, storage, and transport. The excavation and transport of soils contaminated by heavy metals (e.g., lead) would be managed according to SCAQMD Rule 1466 (Control of Particulate Emissions from Soils with Toxic Air Contaminants) and SCAQMD Rule 1166 (VOC emissions from Decontamination of Soil). The plan would also prescribe best management practices (BMP) to follow to prevent hazardous material releases and for cleanup of any hazardous material releases that may occur. *The transportation of hazardous materials and waste shall be conducted in accordance with the applicable regulations codified in 49 CFR Parts 101, 106, 107, and 171 to 180, including, but not limited to, those related to packagings, pre-transportation functions, transportation functions, and functions not subject to the requirements of the federal Hazardous Materials Regulations.*

Additionally, the contractor would comply with applicable federal and state regulations regarding hazardous material handling and storage practices, such as the RCRA, CERCLA, the Hazardous Materials Release Response Plans and Inventory Law, and the Hazardous Waste Control Act.

Page 3.9-11 – Project Feature PF-HHM-2 is revised as follows:

PF-HHM-2. Demolition Plans

Prior to the start of construction, the contractor would prepare demolition plans for the safe dismantling and removal of *roadways,* building components, and debris. The demolition plans would also include plans for testing and abatement procedures for ACM, LBP, and PCB, as well as handling and disposal of treated wood waste (TWW)*, such as creosote and arsenic-treated railroad ties,* and universal waste in accordance with federal and state regulations, including the 1994 Federal Occupational Exposure to Asbestos Standards, SCAQMD Rule 1403 (Asbestos Emissions from Demolition/Renovation Activities), Title 22 of the CCR Division 4.5 (Hazardous Waste), the U.S. Department of Housing and Urban Development Lead-Based Paint Guidelines, and Title 40 of the CFR Part 761.

Page 3.9-31 – The third paragraph of Section 3.9-4.1.1 is revised as follows:

The Proposed Project would demolish *two* existing bridges at Grant Avenue and Del Amo Boulevard *and segments of the surrounding roadways near support columns for bridges*, and reconfigure freight tracks throughout the corridor. The excavation and demolition of the existing

bridges would require the removal, transport, and disposal of soil and bridge materials that have potentially been contaminated by various contaminants of concern as discussed in Section 3.9-3. *Demolition of existing roadways would also potentially encounter lead-based paint and other heavy metals from yellow paint striping and other pavement markings.*

Page 3.9-35 – The second paragraph in Section 3.9-4.2.1 is revised as follows:

Oil and Gas Pipelines

Less than Significant Impact. Oil and gas pipelines are located adjacent to the Proposed Project corridor, and oil refineries are located near the southern end. Oil and gas pipelines including a 10-inch Shell crude oil, 8-inch ExxonMobil jet fuel, and 20-inch Chevron gas lines run within the Metro ROW. Oil and gas pipelines may pose a hazard to human health and safety or to the environment if oil or gas are released. Release could occur through spills during construction or rupture of a pipeline during construction, and *release could also pose potential fire and explosion hazards*. At this phase of design, Metro has obtained as-built drawings from these utility owners and developed preliminary plans for relocation or protect-in-place. *To the greatest extent possible, the project requires pipelines and utilities to be protected in place during construction, rather than relocated. Utilities protected in place would follow all applicable safety regulations and utility owner standards regarding necessary clearances.* Per the Metro Rail Design Criteria, Metro would continue to coordinate with the utility owners in future phases of design, and present preliminary relocation concepts to each utility owner with affected facilities. Metro would conduct additional surveys and potholing as needed to verify the relocation plans, which would avoid any conflicts with pipelines during construction. *Prior to and during construction, Metro and its contractors would follow established utility protection protocols and construction techniques and procedures to prevent accidental damage to underground utilities.* As noted in PF-US-1 in Section 3.11, Utilities and Service Systems, prior to ground-disturbing activities, all oil and gas pipelines within the ROW would be identified and marked onsite in coordination with the ~~well~~*utility* owners to avoid damaging the pipelines. *Other standard operating procedures that would be followed during construction include hand-digging techniques at certain depths to minimize the risk of hitting underground lines, and ensuring that on-site inspectors monitor construction activities to verify compliance with safety protocols.* Utility agreements would be finalized to ensure the designs are prepared by third party utility owners~~.~~*, and the final design layouts would be confirmed or adjusted as needed based on field verification conducted prior to construction. Additionally, the levels of groundborne vibration expected during project construction are not anticipated to exceed the levels at which damage to underground utilities could occur. Most pipelines are buried at depths where vibration from surface construction dissipates significantly, and they are designed to withstand vibration associated with urban development and roadway construction. Moreover, geotechnical engineers and licensed contractors routinely evaluate soil conditions, pipeline depth, and distance from equipment when selecting construction methods, and incorporate design safeguards accordingly. Per Caltrans' Transportation and Construction Vibration Guidance Manual (2020), even high-impact activities such as mine blasting rarely produce vibrations intense enough to damage buried pipelines.* Therefore, the impact related to oil and gas pipelines would be **less than significant**.

Page 3.9-39 – The first two paragraphs in Section 3.9-4.2.2 are revised as follows:

Less than Significant Impact. Once the Proposed Project is operational, the risks discussed in Section 3.9-4.2.1 regarding construction impacts would end. Operation of the Proposed Project

would involve the occasional use and storage of routine detergents and cleansers for vehicle maintenance activities. There would also be potential for fuels, oils, and transmission fluids to drip or spill from Metro support vehicles in limited quantities. Accidental exposure to some of these chemicals can pose physical hazards (e.g., chemical burns) or health hazards (e.g., poisoning), which may give rise to acute or chronic illnesses. The properties and health effects of different chemicals are unique to each chemical and depend on the extent to which an individual is exposed. The exposure of individuals to hazardous materials is minimal, given the limited quantities of these materials that would be stored and used on the project site. The Proposed Project would not include use or storage of chemicals that have the potential to result in an off-site upset or accidental event. *The project would not increase the risk of derailment for the existing freight train, and therefore would not increase the risk of accidental release of hazardous materials in the unlikely event of a freight train derailment. Additionally, the light rail and freight trains would not pose a risk to underground utilities, as any utilities affected by the project would have either been relocated during construction in compliance with utility setback requirements or protected in place using appropriate engineering measures. Vibration levels generated by the operation of light rail transit vehicles and freight trains would remain well below thresholds known to cause damage to buried pipelines.* Therefore, the Proposed Project would result in a **less than significant impact** related to accident conditions involving the release of hazardous materials into the environment during operation.

TRENCH OPTION

Less than Significant Impact. Similar to the Proposed Project, the Trench Option would not include use or storage of chemicals, or disturbance in areas with active or abandoned oil and gas wells that have the potential to result in an off-site upset or accidental event. *Similarly, the project would not increase the risk of derailment for the existing freight train, and therefore would not increase the risk of accidental release of hazardous materials in the unlikely event of a freight train derailment.* Therefore, the Trench Option would result in a **less than significant impact** related to accident conditions involving the release of hazardous materials into the environment during operation.

Page 3.9-40 – The first paragraph of Section 3.9-4.3.1 of the Draft EIR is revised as follows:

Less than Significant Impact. RK Lloyde Continuation High School and Centinela Valley Independent Study School are located near the northern end of the RSA within a quarter-mile of the existing Redondo Beach (Marine) Station. Environmental Charter High School, William Green Elementary School, Adams Middle School, Washington Elementary School, and Franklin School are located near the central portion of the RSA between Manhattan Beach Boulevard and 190th Street within a quarter-mile of the Proposed Project. *The Friendship Campus is under construction immediately northeast of the Inglewood Avenue/Fisk Lane intersection, approximately 550 feet from the nearest (northeast) corner of the property to the Metro ROW.* There are no proposed schools within a quarter-mile of the Proposed Project; therefore, this analysis focuses on existing *and under-construction* schools. The RSA contains multiple sources of potentially hazardous materials that could be encountered during construction of the Proposed Project within a quarter-mile of a school. Overall, the Proposed Project would have a less than significant impact during construction related to the potential to emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of a school. The following sections describe the impacts in detail for the types of hazards.

Page 3.9-44 – Table 3.9-2 is revised with respect to Map ID 14 as follows:

Table 3.9-2. Potential REC Sites for the Proposed Project

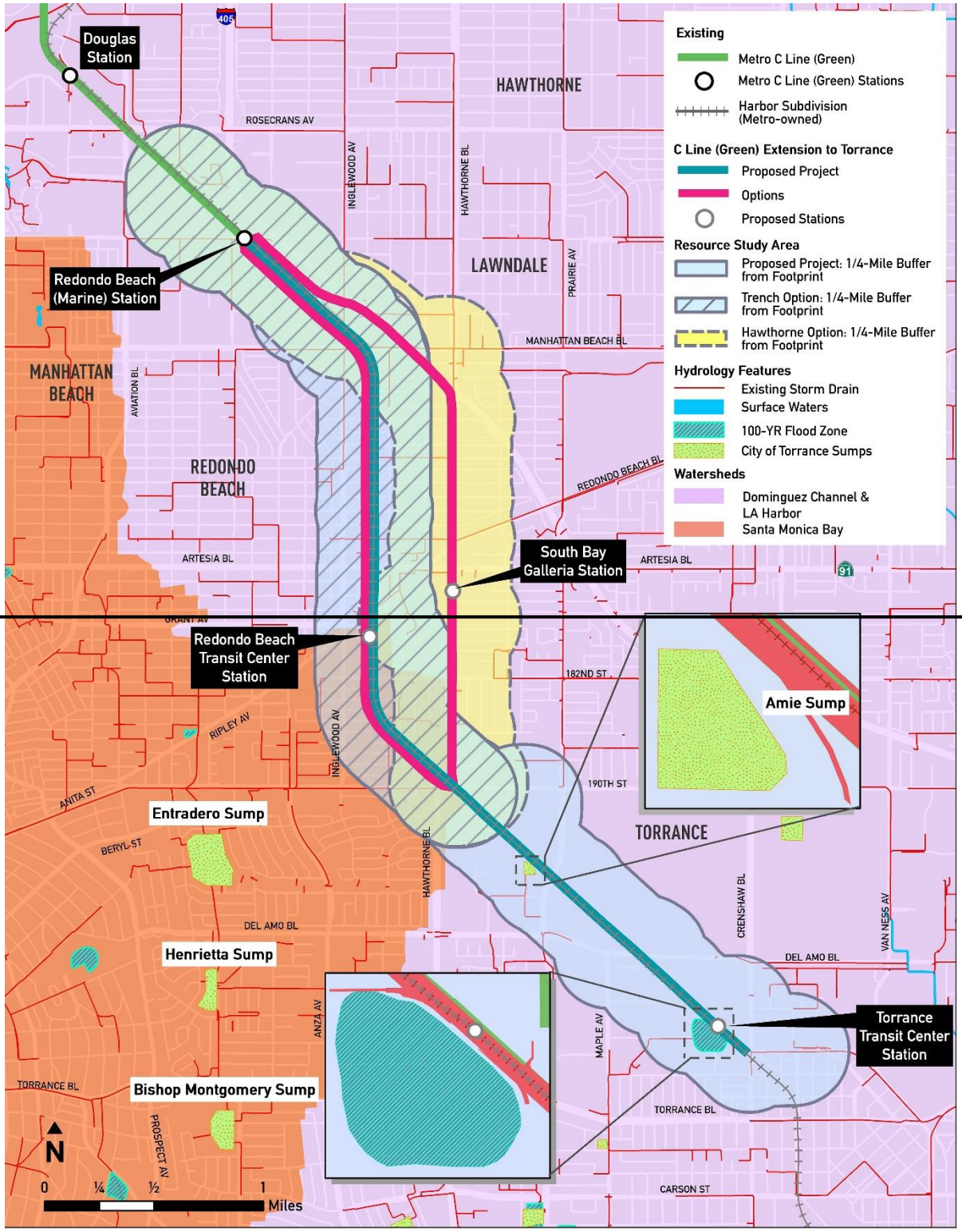
Map ID[1]	Site Name	Distance from Project (In Feet)	Discussion
14	Former Amp-Matrix Facility	600 feet south	Construction may disturb groundwater near the site. A Phase II site investigation is recommended *specifically for the purposes of* ~~to evaluate~~ *evaluating* groundwater for TPH and VOC along the alignment. *The Phase II site investigation would not involve excavation or disturbance of the site itself.*

Note: South of 190th Street, there is one alignment for the Proposed Project, and no options.
[1]Map ID numbers correspond to site numbers shown on Figure 3.9-3 and Figure 3.9-6
TPH=total petroleum hydrocarbons; SVOC= semi-volatile organic compound; VOC= Volatile Organic Compound; REC= Recognized Environmental Conditions; TC= Transit Center; ACM= Asbestos Containing Materials

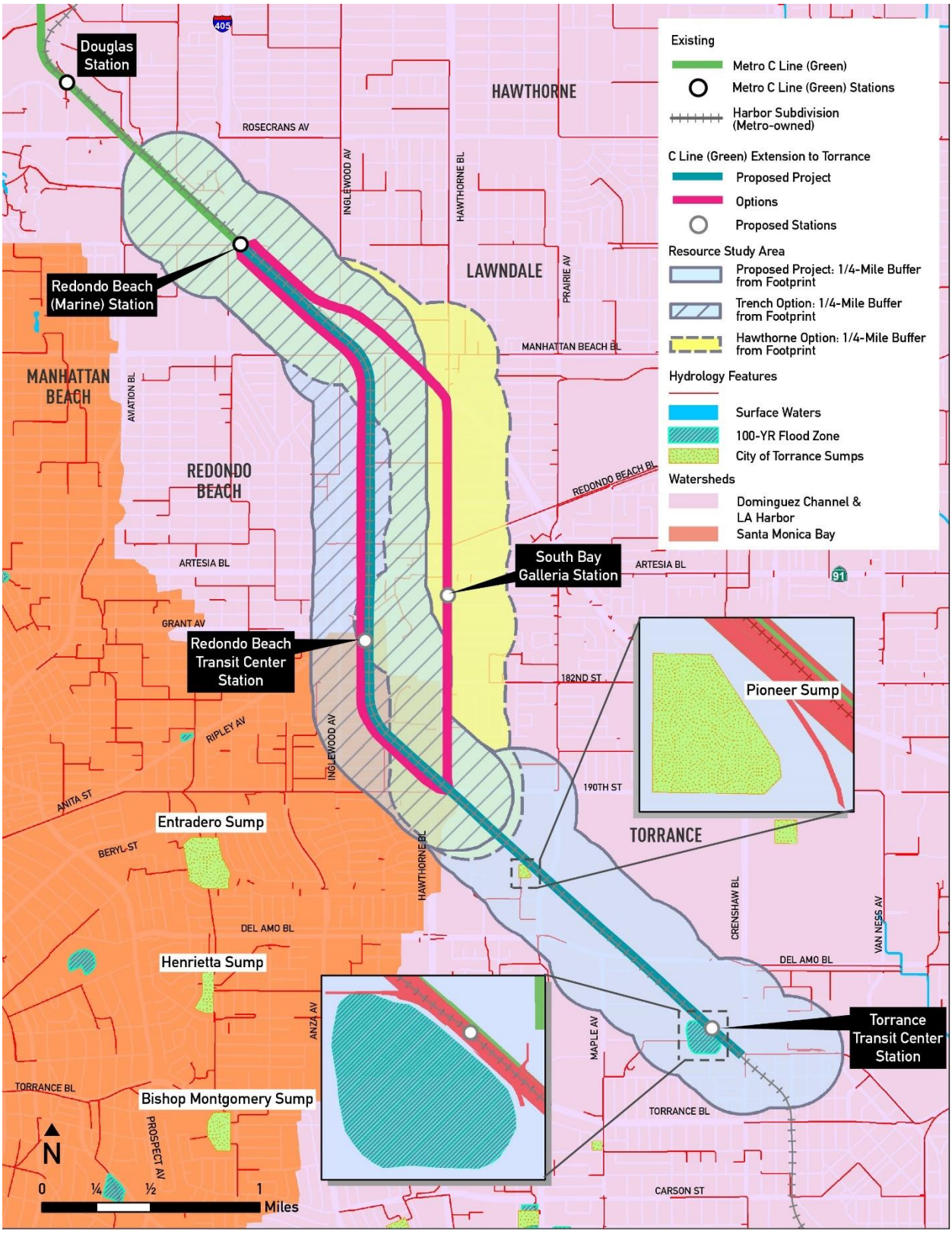
4.14 CHAPTER 3.10 - HYDROLOGY AND WATER QUALITY

The sump label in Figure 3.10-2 Watersheds, Waters, Flood Zones, and Sumps is replaced as follows:

Figure 3.10-2 Watersheds, Waters, Flood Zones, and Sumps



Metro



Sources: FEMA, 2021; LACDPW, 2022b; City of Torrance, 2022; AECOM, 2022; STV, 2022~~5~~5

4.15 CHAPTER 3.11 - UTILITIES AND SERVICE SYSTEMS

Page 3.11-8 – The second paragraph under Section 3.11-2 Methodology is revised to include additional information as follows:

> The analysis identifies utilities and service systems whose services could be impacted by the Proposed Project. As discussed below in Section 3.11-2.2, the RSAs include the utilities and service systems which service the jurisdictions of the Cities of Lawndale, Redondo Beach, and Torrance. Utilities within these jurisdictions were identified and geolocated using ArcGIS. An assessment for each type of utilities and service system was conducted based on the Proposed Project's potential to require the relocation or construction of utilities and service systems facilities. *To the greatest extent possible, the project requires pipelines and utilities to be protected in place during construction, rather than relocated. Determining whether a utility can remain in place depends on several factors, including its burial depth and distance from the track. Pipelines that cross the track but are able to remain in place would be protected by both the depth of burial and by casings[1] that extend across the entire width of the ROW. Pipelines that run parallel to the track would not need to be encased, provided they meet the minimum safe distance and depth requirements established by regulations and utility owners. These practices are consistent with the current protections that exist for the underground pipelines. However, safety requirements have become more stringent compared to the requirements that existed at the time that the utility lines were installed within the ROW. All pipelines that would be protected in place as part of this project would be coordinated with utility owners and informed by modern best practices, with safety as a priority. For example, pipelines that cross the track would require longer encasements*.
>
> The assessment analyzed the potential for impacts based on factors related to utility usage demand, including the potential for water supply provision in the foreseeable future, the potential for project demand to exceed existing utility provider commitments and capacity and the potential for compliance with regulations regarding solid waste.

Page 3.11-10 – The text under Section 3.11-2.4 under PF-US-1. Utility Identification and Coordination was revised as follows:

> Per Metro standard practice, *as design progresses, Metro will continue to* ~~prior to the start of any demolition or construction activities, the construction contractor will~~ verify the locations of existing utilities potentially affected by construction activities. This will include coordinating with all existing utility providers for wet and dry utilities (water, sewer, gas, electric, and telecommunications) *and with private utility owners* to obtain documentation of existing utility locations. Field verification (i.e., potholing and other methods as appropriate) shall be conducted *throughout the preliminary engineering and final design phases* to document the locations of all utilities within proximity to the guideway and station foundations of the guideway and station foundations, and other project elements that may affect utilities. Based on the information from the field investigations, *the final designer will develop layouts of pipe separations based on coordination* ~~the construction contractor will be responsible for coordinating~~ with the appropriate utility owners/operators to determine specific setback requirements for each utility line and the need for any stabilization for protection in place or

[1] A pipeline casing is a large-diameter steel pipe that encases the utility line, which takes the load from the trains above and protects it from damage.

relocation measures. *During the construction and prior to digging, the contractor will conduct additional field verifications, which include requirements such as contacting a utility location service to verify the position of existing pipes, and conducting additional potholing so that the final design layouts can be confirmed or adjusted as needed.*

Page 3.11-13 – The text under Section 3.11-3.2 Wastewater is revised as follows:

Wastewater includes stormwater runoff, sewage, and other non-potable water. Stormwater runoff means surface water runoff and drainage related to precipitation events, or water emanating from on-site sources that may drain on- or off-site, such as water for landscaping purposes. Stormwater runoff is generally collected via on-street drainages as well as stormwater sumps. Sewage is defined as liquid and water-carried industrial and/or domestic wastes generated from facilities, including, but not limited to, dwellings, commercial buildings, industrial facilities, agricultural activities, hospitals, medical facilities, and other institutions. Both stormwater runoff and sewage are collected and transported through underground municipal sewage systems and are then processed and treated through municipal wastewater treatment facilities. *Metro recognizes that stormwater discharge is typically directed to storm drains and not in the Sanitation Districts of Los Angeles County (LACSD) sewage system. Determination of such discharges will be coordinated with LACSD.* This section addresses wastewater both in the form of stormwater runoff and sewage.

Page 3.11-16 – The text under the Wastewater Treatment heading is revised as follows:

The Sanitation Districts of Los Angeles County (LACSD) is the regional agency responsible for the collection and treatment of wastewater in Los Angeles County. The RSA lies within the Los Angeles County Sanitation District #5. Wastewater from the RSA is treated at the JWPCP, which is operated and maintained by the LACSD. It is located in the City of Carson, approximately four miles southeast of the RSA. This plant serves communities throughout the entire South Bay, as well as communities located as far east as ~~Downey~~ *Pomona* and as far north as ~~Inglewood~~ *La Cañada Flintridge.* According to LACSD, JWPCP treats an average of 260 million gallons of wastewater per day and is capable of processing 400 million gallons per day (LACSD, 2022).

Page 3.11-18 – The text under Section 3.11-3.6 Natural Gas and Oil Facilities is revised as follows:

In 2020, SoCal Gas customers consumed approximately 5,231 million therms of natural gas energy according to the CEC database (CEC, 2022c). In 2018, vehicle fuel consumption represented 80% of Metro's energy footprint, including a mix of compressed natural gas (CNG) that powers its fleet (Metro, 2018). There are numerous privately-owned oil pipelines located within the RSA. Owners of the oil pipelines are Crimson Pipeline, Chevron, Shell, and Plains All American. *Oil and gas pipelines, including a 10-inch Shell crude oil, 8-inch ExxonMobil jet fuel, and 20-inch Chevron gas lines, are located within the Metro ROW.* There are no publicly owned oil pipeline utility infrastructures in the RSA.

Page 3.11-28 – The text under Section 3.11-4.3.1 Construction Impacts is revised as follows:

Less than Significant Impact. The Proposed Project would generate wastewater during construction through the use of temporary worker restrooms and limited construction uses. Any wastewater generated during construction would be transported to wastewater facilities via vacuum service trucks. LACSD operates the JWPCP that serves the entire South Bay community as *well as communities located as far east as Pomona and as far north as La Cañada Flintridge* for wastewater treatment. The JWPCP currently treats 260 million gallons of wastewater per day and is capable of processing 400 million gallons per day (~~Los Angeles County Sewer Districts~~ *Los*

Angeles County Sanitation Districts (LACSD), 2022). Wastewater generated by temporary worker restrooms for construction of the Proposed Project would represent a negligible proportion of the daily wastewater processed by the JWPCP, and the facility is anticipated to have adequate capacity to serve the Proposed Project. Therefore, construction of the Proposed Project would result in a less than significant impact related to wastewater treatment capacity.

Page 3.11-33 – The first paragraph under the Wastewater heading is revised as follows:

The LACSD is the regional agency responsible for the collection and treatment of wastewater in Los Angeles County. Wastewater from the RSA is treated at the JWPCP, which is operated and maintained by the LACSD. This plant serves communities throughout the entire South Bay, as well as communities located as far east as ~~Downey~~ *Pomona* and as far north as ~~Inglewood~~ *La Cañada Flintridge*. According to LACSD, JWPCP treats an average of 260 million gallons of wastewater per day and is capable of processing 400 million gallons per day. While LACSD has not identified an existing cumulative impact at JWPCP, development of past, present, and probable future projects could cumulatively increase demands on the existing wastewater infrastructure system.

4.16 CHAPTER 3.12 - ENERGY RESOURCES

Page 3.12-8 – The last paragraph under the Southern California Association of Governments (SCAG) Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) heading is revised as follows:

As part of the 2020-2045 RTP/SCS, SCAG continues to work towards reducing regional energy use and consumption. Strategies to implement this include, but are not limited to, working with local jurisdictions and energy providers, through its Energy and Environment Committee, and administration of the Clean Cities program, Sustainability Planning grants program, and other SCAG energy-related planning activities, to encourage energy efficient building development. Additional measures include, pursuing partnerships with SCE, municipal utilities, and the CPUC to promote energy efficient development in the SCAG region, through coordinated planning, data and information sharing activities. *Since the release of the Draft EIR, SCAG has released and adopted its 2024-2050 RTP/SCS, Connect SoCal 2024. See Section 4.4 of this Final EIR for more information on how the information in Connect SoCal 2024 relates to this environmental review process.*

Page 3.12-26 – Table 3.12-12 Operational Energy Consumption is revised with a footnote as follows:

Table 3.12-12. Operational Energy Consumption

Energy Resource	Units	Proposed Project	Trench Option	Hawthorne Option
Rail Propulsion Electricity	MWh/year	6,947	6,947	6,947
Station & Lighting Electricity	MWh/year	882	882	882
Total Operational Electricity	**MWH/year**	**7,829**	**7,829**	**7,829**
Unit Conversion	*MJ/MWh*	*3,600*	*3,600*	*3,600*
Electricity Energy	***MJ/year***	***28,182,841***	***28,182,841***	***28,182,841***
Vehicle Trip Displacement[1]	VMT/year	(17,083,851)	(17,083,851)	(17,207,383)
Annual Fuel Savings	Gasoline-Gallon Equivalents (GGE)/year	(492,654)	(492,654)	(496,216)
Unit Conversion	*MJ/GGE*	131.2	131.2	131.2
Petroleum Fuels Energy	***MJ/year***	***(64,625,706)***	***(64,625,706)***	***(65,093,010)***
Net Total Operational Energy	**MJ/year**	**(36,442,865)**	**(36,442,865)**	**(36,910,169)**

Source: TAHA, 2022

[1]*Calculated using the potential operating pattern that results in the least forecasted VMT displacement.*

4.17 CHAPTER 3.13 - CULTURAL RESOURCES

Page 3.13-42 – The fourth paragraph under Section 3.13-4.2.1 Construction Impacts is revised as follows:

> The Proposed Project has the potential to disturb or destroy a significant unknown archaeological resource, and therefore there would be a significant impact. Mitigation measure MM-CUL-1 (Cultural Resources Identification Training) would be implemented, which would require construction personnel to be trained in the identification of archaeological resources. Mitigation measure MM-CUL-2 (~~Archaeologist Consultation~~ *Cultural Resources Monitoring and Mitigation Plan*) would also be implemented, which would establish procedures to *follow* ~~stop work~~ in the event of an ~~archaeological~~ *unanticipated* discovery, and to ensure that discovered resources would be avoided or treated in accordance with a treatment plan developed in consultation with Metro. With the implementation of mitigation measures MM-CUL-1 and MM-CUL-2 the impact would be reduced to **less than significant.**

Page 3.13-43 – The third paragraph under Section 3.13-4.2.1 Construction Impacts – Trench Option is revised as follows:

The Trench Option has the potential to disturb or destroy a significant unknown archaeological resource, and therefore there would be a significant impact. Mitigation measure MM-CUL-1 would be implemented, which would require construction personnel to be trained in the identification of archaeological resources. Mitigation measure MM-CUL-2 would also be implemented, would also be implemented, which would establish procedures to *follow*~~stop work~~ in the event of an ~~archaeological~~ *unanticipated* discovery, and to ensure that discovered resources would be avoided or treated in accordance with a treatment plan developed in consultation with Metro. With implementation of mitigation measures MM-CUL-1 and MM-CUL-2 the impact would be reduced to **less than significant**.

Page 3.13-43 – The third paragraph under Section 3.13-4.2.1 Construction Impacts – Hawthorne Option is revised as follows:

Although the Hawthorne Option is elevated, certain construction activities (e.g., the construction of retaining walls and drainage) still have the potential to disturb or destroy a significant unknown archaeological resource, and therefore cause a significant impact. Mitigation measure MM-CUL-1 would be implemented, which would require construction personnel to be trained in the identification of archaeological resources. Mitigation measure MM-CUL-2 would also be implemented, which would establish procedures to *follow* ~~stop work~~ in the event of an ~~archaeological~~ *unanticipated* discovery and ensure that discovered resources would be avoided or treated in accordance with a treatment plan developed in consultation with Metro. With implementation of mitigation measures MM-CUL-1 and MM-CUL-2, the impact would be reduced to **less than significant**.

Page 3.13-45 – The third paragraph under Section 3.13-4.3.1 is revised as follows:

The Proposed Project has moderate sensitivity for encountering historic remains near El Nido Park and a low sensitivity for buried Native American archaeological deposits, which could include human remains. However, human remains can be encountered in fill, re-deposited, or disturbed soils, as well as intact soils. Disturbance of significant unknown human remains would result in a significant impact. Mitigation measure*s* MM-CUL-3 (Unanticipated Discovery of Human Remains ~~Associated with Known Cemeteries~~) would be implemented *for construction near El Nido Park and Pacific Crest Cemetery*, which would ~~establish a~~ require monitoring *in accordance with the CRMMP* ~~program~~ as well as *establish* treatment measures and avoidance strategies for any remains that are identified. In addition, if Native American remains are encountered, these remains would be treated with appropriate deference through compliance with legal requirements pursuant to Health and Safety Code Section 7050.5 and PRC Section 5097.98. Therefore, with implementation of mitigation measure MM-CUL-3, construction of the Proposed Project would result in a **less than significant impact** related to disturbance of human remains.

Page 3.13-45 – The second paragraph under Section 3.13-4.3.1 is revised as follows:

Due to the depth and extent of the ground disturbance associated with the Trench Option, the likelihood of encountering buried Native American archaeological deposits, including human remains is slightly higher than the Proposed Project. Additionally, human remains can be encountered in fill, redeposited, or disturbed soils, as well as intact soils. Disturbance of significant unknown human remains would result in a significant impact. Mitigation measure MM-CUL-3 would be implemented *for construction near El Nido Park and Pacific Crest Cemetery*, which would ~~establish a~~ require monitoring *in accordance with the CRMMP* ~~program~~ as well as *establish* treatment measures and avoidance strategies for any remains that are identified. In

addition, if Native American remains are encountered, these remains would be treated with appropriate deference through compliance with legal requirements pursuant to Health and Safety Code Section 7050.5 and PRC Section 5097.98.

Therefore, with implementation of mitigation measure MM-CUL-3, construction of the Trench Option would result in a **less than significant impact** related to disturbance of human remains.

Page 3.13-46 – The text under Section 3.13-5 Mitigation Measures is revised as follows to respond to feedback received during Assembly Bill 52 consultation with the Gabrieleno Band of Mission Indians - Kizh Nation:

MM-CUL-1. Cultural Resources Identification Training

~~Prior to any ground-disturbing activities~~ *Prior to the issuance of notice to proceed with construction*, all construction personnel involved in ground-disturbing activities shall be provided with appropriate cultural resources training. The training shall instruct the personnel regarding the legal framework protecting cultural resources, typical kinds of cultural resources that may be found during construction, artifacts that would be considered potentially significant, and proper procedures and notifications if cultural resources and/or are inadvertently discovered. The training shall be ~~presented~~ *prepared* by a Secretary of the Interior professionally qualified archaeologist*, in consultation with interested Native American tribes consulting under AB 52, who shall provide information on resources of interest to Native American tribes* ~~who shall review types of~~ *and include* cultural resources *and* artifacts that would be considered potentially significant to ensure operator recognition of these materials during construction.

MM-CUL-2.~~ Archaeologist Consultation~~ Cultural Resources Monitoring and Mitigation Plan
~~If buried cultural resources are uncovered during construction, all work shall be halted in the vicinity of the archaeological discovery until a Secretary of the Interior professionally qualified archaeologist can visit the site of discovery and assess the significance of the archaeological resource.~~

~~If an archaeological deposit is identified, the construction contractor shall stop construction within 50 feet of the exposed resource until a Secretary of Interior professionally qualified archaeologist can evaluate the find (see 36 CFR 800.11.1 and California Code of Regulations, Title 14, Section 15064.5[f]). Examples of such cultural materials might include ground stone tools such as mortars, bowls, pestles, and manos; chipped stone tools such as projectile points or choppers; flakes of stone not consistent with the immediate geology such as obsidian or fused shale; historic trash pits containing bottles and/or ceramics; or structural remains. If the professional qualified archaeologist finds that the resources are significant, further impacts will be avoided if Metro determines that avoidance is feasible in light of factors such as the nature of the find, Proposed Project design, costs, and other considerations. If avoidance is not feasible, a treatment plan shall be developed and implemented by the construction contractor in consultation with a Secretary of Interior professional qualified archaeologist and Metro to reduce adverse impacts to below a level of significance. The treatment plan shall prioritize data recovery through implementation of an excavation and analysis program. The treatment plan shall include, at a minimum, the following: (a) a statement of why data recovery is appropriate as a mitigation measure; (b) a research plan that sets forth the research questions that can reasonably be expected to be addressed by excavation and analysis of the site; (c) a statement of the types and kinds of data that can reasonably be expected to exist at the site and how these~~

~~data will be used to answer important research questions; (d) a step-by-step discussion of field and laboratory methods to be employed; and (e) provisions for curation and storage of the artifacts, notes, and photographs.~~

~~If a resource is encountered that is prehistoric or otherwise of potentially Native American origin, regardless of any significance evaluation determined by Metro based on the input of a Secretary of the Interior professionally qualified archaeologist, interested Native American tribes consulting under AB 52 shall be contacted and their input sought as to the tribal significance of the resource. Based on this tribal input, Metro shall make a determination as to whether the resource constitutes a tribal cultural resource. The consulting Native American parties shall also be consulted as to the treatment and final disposition of the resource.~~

~~If determined appropriate during tribal consultation, a Native American monitor would be retained involving work at a prehistoric site, or at other suitable locations determined during tribal consultation. Treatment measures for tribal cultural resources may include development of avoidance strategies, capping with fill material, or mitigation of impacts through data recovery programs such as excavation or detailed documentation.~~

~~Ground disturbing activities within the affected area may resume once the site has been fully evaluated and impacts mitigated to the satisfaction of Metro based on input from a Secretary of Interior qualified archaeologist and, if applicable (e.g., if the affected area was determined to contain tribal cultural resources), a Native American monitor.~~

~~If during cultural resources monitoring the qualified archaeologist determines that the sediments being excavated are previously disturbed or unlikely to contain significant cultural materials, the qualified archaeologist can specify that monitoring be reduced or eliminated.~~

Prior to the issuance of notice to proceed with construction, the construction contractor shall prepare, and Metro shall review and approve, a Cultural Resources Monitoring and Mitigation Plan (CRMMP). The CRMMP shall be prepared in consultation with a Secretary of the Interior-qualified archaeologist and interested Native American tribes consulting under AB 52.
At a minimum, the CRMMP shall:

- *Identify the areas where archaeological and Native American monitoring will occur, consistent with MM-CUL-3, and describe monitoring methods and reporting requirements.*
- *Establish the protocol to follow in the event of an unanticipated discovery, requiring that, if an archaeological deposit is identified, the construction contractor shall stop construction within 50 feet of the exposed resource until a Secretary of Interior professionally qualified archaeologist can evaluate the find (see 36 CFR 800.11.1 and California Code of Regulations, Title 14, Section 15064.5[f]). If the resource is determined to be a historical resource (as defined in Public Resources Code Section 21084.1) or a unique archaeological resource (as defined in Public Resources Code Section 21083.2[g]), the CRMMP shall require:*
  - *Avoidance of the resource, where feasible, through project redesign, preservation in place, capping or other methods consistent with Title 14, Section 15126.4(b)(3).*
  - *Where avoidance is not feasible, as determined by Metro, in light of factors such as the nature of the find, Proposed Project design, costs, and other considerations, data recovery shall be implemented through excavation and documentation consistent with*

the Secretary of Interior's Standards for Archaeology and Historic Preservation (48 Fed. Res. 44716) and the State Office of Historic Preservation Standards.

- *Define performance standards requiring all data recovery efforts to obtain information necessary to address important research questions, that all recovered be cleaned, catalogued, and curated at a qualified repository that meets federal and state curation standards, and that a comprehensive technical report be prepared and filed with the South Central Coastal Information Center of the California Historical Resources Information System (CHRIS).*
- *Incorporate tribal consultation with Native American tribes consulting under AB52.*
- *Provide documentation and reporting protocols for submitting monitoring logs during construction and a final report documenting all findings to be submitted to Metro, consulting tribes, and CHRIS.*

The CRMMP shall be implemented throughout all ground-disturbing activities in previously undisturbed areas or areas of deep excavation below the depth of prior disturbance (generally assumed to be 5 feet unless site-specific studies show a greater or lesser depth of prior disturbance), or as otherwise required by MM-CUL-3.

MM-CUL-3. Unanticipated Discovery of Human Remains ~~Associated with Known Cemeteries~~

~~To mitigate potential impacts to human remains at El Nido Park (located between the Kingsdale Avenue and 186th Street cross section to 182nd Street) and the Pacific Crest Cemetery (2701 182nd Street), a location-specific Cultural Resources Monitoring and Mitigation Plan (CRMMP) shall be developed and implemented by the construction contractor in consultation with a Secretary of the Interior-qualified archaeologist and Metro for these locations. The CRMMP shall outline methodology for monitoring and the protocol to follow in the event of an unanticipated discovery at these locations. Should human remains and/or associated funerary objects be identified during earth-moving activities, the CRMMP shall address methods for data recovery, anticipated artifact types, artifact analysis, report writing, repatriation of human remains and associated grave goods, and curation. The CRMMP shall also require that an archaeologist qualified in prehistoric and historical archaeology, be retained prior to ground-disturbing activities. Archaeological monitoring during all ground disturbance adjacent to El Nido Park and the Pacific Crest Cemetery shall be conducted in accordance with the Project CRMMP. If there is an unanticipated discovery of human remains and/or associated funerary objects, then work shall be halted within 50 feet of the find and a qualified archaeologist shall assess the significance of the find and, if necessary, develop appropriate treatment measures, per the CRMMP. Treatment measures typically include development of avoidance strategies, capping with fill material, or mitigation of impacts through data recovery programs such as excavation or detailed documentation.~~

Archaeological and Native American monitoring (see MM-CUL-1 and MM-TCR-1) shall be required during all ground- disturbing activities in areas of excavation extending below the depth of prior disturbances, as defined in MM-CUL-2, and in areas adjacent to known cemeteries or other locations where the potential for encountering human remains is elevated, including El Nido Park (located between the Kingsdale Avenue and 186th Street cross section to 182nd Street) and the Pacific Crest Cemetery (2701 182nd Street). Archaeological monitoring shall be conducted in accordance with the Project CRMMP required by MM-CUL-2, which establishes monitoring methods, evaluation procedures, treatment, standards, and reporting requirements. If human remains and/or associated funerary objects are encountered, then work shall be halted within 50 feet of the find and California Health and Safety Code Section 5097.98 and Public

Resources Code Section 5097.98 shall be followed, including immediate notification of the County Coroner and consultation with the Most Likely Descendant identified by the Native American Heritage Commissions.

4.18 CHAPTER 3.14 - TRIBAL CULTURAL RESOURCES

Page 3.14-15 – The second paragraph under 3.14-3.7 Assembly Bill 52 is revised as follows:

On March 5, 2021, one individual responded, Adrian Morales on behalf of the Gabrieleno Tongva San Gabriel Band of Mission Indians under the leadership of Chairman/Chief Anthony Morales. Adrian Morales said that the Gabrieleno Tongva San Gabriel Band of Mission Indians would like to participate in the consultation process, and there will be a follow-up correspondence letter with formal recommendations to address potential adverse effects to tribal cultural resources. Metro responded on May 10, 2021, with additional cultural resource information based on the archival research and survey. Follow-up emails were sent by Metro to Adrian Morales on May 25, July 12, July 29, and October 27, 2021, each requesting additional follow-up. There ~~have~~ *had* been no responses ~~since~~ between the initial communication and this Draft EIR, ~~which~~ was ~~will be~~ transmitted to a representative of the Gabrieleno Tongva San Gabriel Band of Mission Indians to close consultation. *In February 2023, after the release of the Draft EIR, the Gabrieleno Band of Mission Indians - Kizh Nation requested an update on the project from Metro. Metro's project team met virtually with Andrew Salas (Chairman of the Tribe) and Matthew Teutimez (Tribal Biologist) of the Gabrieleno Band of Mission Indians - Kizh Nation on April 26, 2023, and received feedback, particularly on mitigation measures, to incorporate into the Final EIR.*

Page 3.14-16 – The third paragraph under Section 3.14-4.1.1 Construction Impacts is revised as follows:

Despite prior disturbances, the excavations associated with the Proposed Project have the potential to adversely impact a significant tribal cultural resource. This would result in a significant impact. Mitigation measure ~~MM-CUL-1 (Cultural Resources Identification Training) would be implemented, which would require construction personnel to be trained in the identification of archaeological resources and tribal cultural resources. Mitigation measure MM-CUL-2 (Archaeologist Consultation) which would establish procedures to stop work in the event of an archaeological discovery of potentially Native American origin, require tribal consultation, and ensure that discovered resources would be avoided or treated in accordance with a treatment plan developed in consultation with Metro and consulting Native American parties. Mitigation measures MM-CUL-3 (Unanticipated Discovery of Human Remains Associated with Known Cemeteries) would be implemented, which would establish a require monitoring program as well as treatment measures and avoidance strategies for any remains that are identified. In addition, if Native American human remains are encountered, these would be treated with appropriate deference through compliance with legal requirements pursuant to Health and Safety Code Section 7050.5 and Public Resource Code Section 5097.98.~~ *MM-TCR-1 (Native American Monitoring) would establish consultation with tribes under AB 52. Mitigation measure MM-TCR-2 [Unanticipated Discovery of Tribal Cultural Resource Objects (Non-Funerary/Non-Ceremonial)] would establish procedures to stop work and determine treatment in consultation with the Native American monitor in the event of the discovery of non-funerary/non-ceremonial objects of Native American origin. Mitigation measure MM-TCR-3 [Unanticipated Discovery of Tribal Cultural Resource Objects (Funerary/ Ceremonial)] would establish procedures to stop work and determine treatment in consultation with the Native American monitor in the event of the discovery of funerary/ceremonial objects of Native*

American Origin. Therefore, with implementation of mitigation measures MM-~~CUL~~*TCR*-1, MM-~~CUL~~*TCR*-2, and MM-~~CUL~~*TCR*-3 the impact would be reduced to **less than significant**. ~~Refer Section 3.13, Cultural Resources, for additional detail of these mitigation measures.~~

Page 3.14-16 – The third paragraph under Section 3.14-4.1.1 Construction Impacts – Trench Option is revised as follows:

Excavation associated with the Trench Option has the potential to adversely impact a significant tribal cultural resource which would result in a significant impact. Mitigation measure M~~M-CUL-1 would be implemented, which would require construction personnel to be trained in the identification of archaeological resources and tribal cultural resources. Mitigation measure MM-CUL-2 would also be implemented, which would establish procedures to stop work in the event of an archaeological discovery of potentially Native American origin, require tribal consultation, and ensure that discovered resources would be avoided or treated in accordance with a treatment plan developed in consultation with Metro and consulting Native American parties. Refer to Section 3.13, Cultural Resources for additional detail of these mitigation measures. Mitigation measure~~*s* ~~MM-CUL-3 (Unanticipated Discovery of Human Remains Associated with Known Cemeteries would be implemented which would establish a require monitoring program as well as treatment measures and avoidance strategies for any remains that are identified. In addition, if Native American human remains are encountered, these would be treated with appropriate deference through compliance with legal requirements pursuant to Health and Safety Code Section 7050.5 and Public Resource Code Section 5097.98.~~ *MM-TCR-1 (Native American Monitoring) would establish consultation with tribes under AB 52. Mitigation measure MM-TCR-2 [Unanticipated Discovery of Tribal Cultural Resource Objects (Non-Funerary/Non-Ceremonial)] would establish procedures to stop work and determine treatment in consultation with the Native American monitor in the event of the discovery of non-funerary/non-ceremonial objects of Native American origin. Mitigation measure MM-TCR-3 [Unanticipated Discovery of Tribal Cultural Resource Objects (Funerary/ Ceremonial)] would establish procedures to stop work and determine treatment in consultation with the Native American monitor in the event of the discovery of funerary/ceremonial objects of Native American Origin.* Therefore, with implementation of mitigation measures MM-~~CUL~~*TCR*-1, MM-~~CUL~~*TCR*-2, and MM-~~CUL~~*TCR*-3 the impact would be reduced to **less than significant**.

Page 3.14-17 – The second paragraph under Section 3.14-4.1.1 Construction Impacts – Hawthorne Option is revised as follows:

Nevertheless, excavations associated with the Hawthorne Option have the potential to adversely impact a significant tribal cultural resource which would result in a significant impact. Mitigation measure ~~MM-CUL-1 would be implemented, which would require construction personnel to be trained in the identification of archaeological resources and tribal cultural resources. Mitigation measure MM-CUL-2 would also be implemented, which would establish procedures to stop work in the event of an archaeological discovery, of potentially Native American origin, require tribal consultation, and ensure that discovered resources would be avoided or treated in accordance with a treatment plan developed in consultation with Metro and consulting Native American parties. Refer to Section 3.13, Cultural Resources for additional detail of these mitigation measures. Finally, if Native American human remains are encountered, these would be treated with appropriate deference through compliance with legal requirements pursuant to Health and Safety Code Section 7050.5 and Public Resource Code Section 5097.98.~~ *MM-TCR-1 (Native American Monitoring) would establish consultation with tribes under AB 52. Mitigation measure MM-TCR-2 [Unanticipated Discovery of Tribal Cultural Resource Objects*

(Non-Funerary/Non-Ceremonial)] would establish procedures to stop work and determine treatment in consultation with the Native American monitor in the event of the discovery of non-funerary/non-ceremonial objects of Native American origin. Mitigation measure MM-TCR-3 [Unanticipated Discovery of Tribal Cultural Resource Objects (Funerary/ Ceremonial)] would establish procedures to stop work and determine treatment in consultation with the Native American monitor in the event of the discovery of funerary/ceremonial objects of Native American Origin. Therefore, with implementation of mitigation measures MM-~~CUL~~*TCR*-1, MM-~~CUL~~*TCR*-2, and MM-~~CUL~~*TCR*-3 the impact would be reduced to **less than significant**.

Page 3.14-18 – The text under Section 3.14-4.2.1 Construction Impacts is revised as follows:

Less than Significant with Mitigation. No resources have been determined by Metro, in its discretion and supported by substantial evidence, to be significant tribal cultural resources within the RSA. However, excavations associated with construction have the potential to disturb and destroy an unknown significant tribal cultural resource. This disturbance of significant tribal cultural resources would result in a significant impact. Mitigation measure ~~MM-CUL-1 would be implemented, which would require construction personnel to be trained in the identification of archaeological resources and tribal cultural resources. Mitigation measure MM-CUL-2 would also be implemented, which would establish procedures in the event of an archaeological discovery of potentially Native American origin, require tribal consultation, and ensure that discovered resources would be avoided or treated in accordance with a treatment plan developed in consultation with Metro and consulting Native American parties. Mitigation measure MM-CUL-3 would be implemented, which would establish a monitoring program as well as treatment measures and avoidance strategies for any remains that are identified. Refer to Section 3.13, Cultural Resources for discussion of these mitigation measures~~ *MM-TCR-1 (Native American Monitoring) would establish consultation with tribes under AB 52. Mitigation measure MM-TCR-2 [Unanticipated Discovery of Tribal Cultural Resource Objects (Non-Funerary/Non-Ceremonial)] would establish procedures to stop work and determine treatment in consultation with the Native American monitor in the event of the discovery of non-funerary/non-ceremonial objects of Native American origin. Mitigation measure MM-TCR-3 [Unanticipated Discovery of Tribal Cultural Resource Objects (Funerary/ Ceremonial)] would establish procedures to stop work and determine treatment in consultation with the Native American monitor in the event of the discovery of funerary/ceremonial objects of Native American Origin.* Therefore, with implementation of mitigation measures MM-~~CUL~~*TCR*-1, MM-~~CUL~~*TCR*-2, and MM-~~CUL~~*TCR*-3 the impacts would **less than significant**.

TRENCH OPTION

Less than Significant with Mitigation. Similar to the Proposed Project, there are no identified tribal cultural resources in the Trench Option RSA. However, construction of the Trench Option has the potential to disturb and destroy an unknown significant tribal cultural resource, and this would be a significant impact. Mitigation measures MM-~~CUL~~*TCR*-1, MM-~~CUL~~*TCR*-2, and MM-~~CUL~~*TCR*-3, would be implemented, which would require construction personnel to be trained in the identification of archaeological resources and tribal cultural resources, ~~and~~ establish procedures ~~to stop work~~ in the event of a*n* ~~resource~~ *unanticipated* discovery of potentially Native American origin, require tribal consultation, and ensure that discovered resources would be avoided or treated in accordance with a treatment plan developed in consultation with Metro and consulting Native American parties. Therefore, with implementation of mitigation measures MM-~~CUL~~*TCR*-1, MM-~~CUL~~*TCR*-2, and MM-~~CUL~~*TCR*-3 impacts would be **less than significant.**

HAWTHORNE OPTION

Less than Significant with Mitigation. Similar to the Proposed Project, there are no identified tribal cultural resources in the Hawthorne Option RSA. However, construction of the Hawthorne Option has the potential to disturb and destroy an unknown significant tribal cultural resource, and this would be a significant impact. Mitigation measures MM-~~CUL~~*TCR*-1, MM-~~-CUL~~*TCR*-2, and MM-~~-CUL~~*TCR*-3 would be implemented, which would require construction personnel to be trained in the identification of archaeological resources and tribal cultural resources, ~~and~~ establish procedures to *follow* ~~stop work~~ in the event of a*n* ~~resource~~ *unanticipated* discovery of potentially Native American origin, require tribal consultation, and ensure that discovered resources would be avoided or treated in accordance with a treatment plan developed in consultation with Metro and consulting Native American parties. Therefore, with implementation of mitigation measures MM-~~CUL~~*TCR*-1, MM-~~-CUL~~*TCR*-2, and MM-~~-CUL~~*TCR*-3 the impacts would be **less than significant.**

Page 3.14-19 – The text under Section 3.14-5 Mitigation Measures is revised as follows:

~~Mitigation measures MM-CUL-1, MM-CUL-2, and MM-CUL-3 outlined in Section 3.13, Cultural Resources address the potentially significant impacts during construction.~~

MM-TCR-1: Native American Monitoring

Prior to the issuance of notice to proceed with construction, Metro shall document retention of a Native American Monitor from, or approved by, consulting tribes under AB 52.

Native American monitoring shall be required during all excavation that extends below the depth of prior disturbance, as defined in MM-CUL-2, and in any areas identified through the cultural resources search or tribal consultation as having higher potential for intact tribal cultural resources. Native American monitoring shall be conducted in coordination with archaeological monitoring required under MM-CUL-3 and consistent with the CRMMP prepared under MM-CUL-2.

If, after a good-faith effort, a qualified Native American monitor is not available at the time ground-disturbing activities are scheduled, construction may proceed with archaeological monitoring in accordance with MM-CUL-3, provided that consultation with the tribes continues regarding treatment of any tribal cultural resources identified. For the purposes of this measure, a good-faith effort shall consist of documented outreach to consulting tribes regarding the construction schedule, made at least 15 working days in advance of the ground-disturbance start date, with at least one follow-up attempt by phone or email if no response is received.

The Native American Monitor shall prepare monitoring documentation describing the relevant ground-disturbing activities, the type of construction activities performed, locations of ground-disturbing activities, locations of monitoring, soil types, and any cultural or tribal resources identified, including but not necessarily limited to, Native American cultural and historical artifacts, remains, places of significance, etc., as well as any discovered Native American (ancestral) human remains and burial goods. The documentation shall be prepared in accordance with the CRMMP and provided to Metro. Metro shall make the documentation available to consulting tribes upon request.

Native American monitoring may conclude when Metro determines, in consultation with the project archaeologist and consulting tribes, that all ground-disturbing activities with the potential to affect tribal cultural resources have been completed.

MM-TCR-2: Unanticipated Discovery of Tribal Cultural Resource Objects (Non-Funerary/Non-Ceremonial)

In the event that potential cultural material is discovered during ground-disturbing activities, all construction activities in the immediate vicinity of the discovery shall cease (i.e., not less than the surrounding 50 feet). The discovery shall be evaluated promptly by the archaeological and Native American monitors in accordance with the CRMMP required by MM-CUL-2. If the find is determined to be a tribal cultural resource under Public Resources Code Section 21074, Metro, in consultation with the monitors and consulting tribes under AB 52, shall determine appropriate treatment consistent with the protocols and performance standards set forth in MM-CUL-2. Preservation in place, including avoidance or protective measures such as capping, shall be the preferred treatment. If preservation in place is not feasible, mitigation shall be implemented through data recovery and documentation in accordance with the Secretary of the Interior's Standards and CEQA Guidelines Section 15126.4(b), with tribal consultation to ensure culturally appropriate treatment.

MM-TCR-3: Unanticipated Discovery of Human Remains and Associated Funerary or Ceremonial Objects

Native American human remains are defined in PRC 5097.98 (d)(1) as an inhumation or cremation, and in any state of decomposition or skeletal completeness. Funerary objects, called associated grave goods in Public Resources Code Section 5097.98, are also to be treated according to this statute.

In the event that human remains or associated funerary objects are encountered during ground-disturbing activities, construction shall halt within 50 feet of the find. The discovery shall be addressed in accordance with the CRMMP required by MM-CUL-2 and the protocols set forth in MM-CUL-3. Consistent with California Health and Safety Code Section 7050.5, the County Coroner shall be notified immediately. If the remains are determined to be Native American, the Native American Heritage Commission shall be contacted, and consultation shall occur with the Most Likely Descendant identified by the Commission, pursuant to Public Resources Code Section 5097.98.

Native American human remains and associated funerary or ceremonial objects shall be treated together as a single burial unit under Public Resources Code Section 5097.98(d), with preservation in place as the preferred treatment. If preservation in place is not feasible, the Most Likely Descendant, in consultation with Metro, shall determine culturally appropriate treatment in accordance with Public Resources Code Section 5097.98(d)(2). Any discovery of human remains/burial goods shall be kept confidential to prevent further disturbance.

Page 3.14-19 – The text under Section 3.14-6 Project Impacts Remaining After Mitigation is revised as follows:

3.14-~~1~~6.1 Proposed Project

With the incorporation of mitigation measures MM-~~CUL~~*TCR*-1, MM-~~CUL~~*TCR*-2, and MM-~~CUL~~*TCR*-3~~, as outlined in Section 3.13, Cultural Resources~~, the Proposed Project would not result in new or additional significant impacts related to tribal cultural resources. Therefore, impacts of the Proposed Project would be less than significant.

3.14-6.2 Trench Option

With the incorporation of mitigation measures MM-~~CUL~~*TCR*-1, MM-~~CUL~~*TCR*-2, and MM-~~CUL~~*TCR*-3 ~~as outlined in Section 3.13, Cultural Resources~~, the Trench Option would not result in new or additional significant impacts related to tribal cultural resources. Therefore, impacts of the Trench Option would be less than significant.

3.14-6.3 Hawthorne Option

With the incorporation of mitigation measures MM-~~CUL~~*TCR*-1, MM-~~CUL~~*TCR*-2, and MM-~~CUL~~*TCR*-3 ~~outlined in Section 3.13, Cultural Resources,~~ the Hawthorne Option modifications would not result in new or additional significant impacts related to tribal cultural resources. Therefore, impacts of the Hawthorne Option would be less than significant.

Page 3.14-20 – The text under Section 3.14-7.1.1 Proposed Project is revised as follows:

The development of the Proposed Project in combination with other projects located in the adjacent area would increase the potential for impacts to tribal cultural resources and could contribute to the loss of such resources in the region. The potential that development consistent with local plans would impact tribal cultural resources during development is determined by a variety of factors, including the type of development that is proposed. No tribal cultural resources have been identified within the Proposed Project RSA. However, the Proposed Project would have the potential to disturb unknown tribal cultural resources during construction. Should tribal cultural resources be discovered, Metro would comply with applicable federal, state, and local guidelines, including PRC Sections 2108.3.2 and 5097.98 and Health and Safety Code Section 7050.5. Mitigation measures MM-~~CUL~~*TCR*-1, MM-~~CUL~~*TCR*-2, and MM-~~CUL~~*TCR*-3 would be implemented, which would reduce the impact to less than significant. Probable future projects would be expected to comply with applicable federal, state, and local regulations to protect tribal cultural resources, and would implement project-specific mitigation measures during construction. Therefore, the Proposed Project in combination with past, present, and probable future projects would not result in a significant cumulative impact on tribal cultural resources during construction. Operation of the Proposed Project would not cause subsurface ground disturbance that would impact a tribal cultural resource. Therefore, the Proposed Project in combination with past, present, and probable future projects would not result in a significant cumulative impact on tribal cultural resources during operation.

Page 3.14-20 – The text under Section 3.14-7.1.2 Trench Option is revised as follows:

No tribal cultural resources have been identified within the Trench Option RSA. The potential for cumulative impacts on unknown tribal cultural resources from the Trench Option would be similar to the analysis presented above for the Proposed Project, and the impact would be less than significant with implementation of mitigation measures MM-~~CUL~~*TCR*-1, MM-~~CUL~~*TCR*-2, and MM-~~CUL~~*TCR*-3. The Trench Option in combination with past, present, and probable future projects would not result in a significant cumulative impact on tribal cultural resources during construction or operation.

Page 3.14-20 – The text under Section 3.14-7.1.3 Hawthorne Option is revised as follows:

No tribal cultural resources have been identified within the Hawthorne Option RSA. The potential for cumulative impacts on unknown tribal cultural resources from the Hawthorne Option would be similar to the analysis presented above for the Proposed Project, and the impact would be less than significant with implementation of mitigation measures MM-~~CUL~~*TCR*-1, MM-~~CUL~~*TCR*-2, and MM-~~CUL~~*TCR*-3. The Hawthorne Option in combination with past,

present, and probable future projects would not result in a significant cumulative impact on tribal cultural resources during construction or operation.

4.19 CHAPTER 3.15 - PUBLIC SERVICES

Page 3.15-5 – The discussion under the Southern California Association of Governments (SCAG) Regional Transportation Plan/Sustainable Communities Strategy heading is revised as follows:

SCAG is the Metropolitan Planning Organization for Imperial, Los Angeles, Orange, Riverside, San Bernardino, and Ventura Counties and 191 cities. SCAG is required to prepare an RTP/SCS every four years that provides a comprehensive framework and outlook for guiding growth in population, housing, and employment. The most recent iteration of the SCAG RTP/SCS that has been formally adopted is the Connect SoCal 2020–2045 RTP/SCS (Connect SoCal), which was officially adopted in September 2020. The 2020-2045 RTP/SCS forecasts regional and local population, household, and employment growth projections through the horizon year of 2045. *Since the release of the Draft EIR, SCAG has released and adopted its 2024-2050 RTP/SCS, Connect SoCal 2024. See Section 4.4 of this Final EIR for more information on how the information in Connect SoCal 2024 relates to this environmental review process.*

Page 3.15-11 – The discussion under Section 3.15-2.3 Project Features is revised as follows:

As described in Chapter 2, Project Description, a number of features have been incorporated into the Proposed Project in order to ensure compliances with the laws, guidelines, and best practices of regulatory agencies. ~~While project features were not developed specifically for public services,~~ Project Feature (PF)-T-1, Construction Traffic Management Plan, as described in Section 3.1, Transportation, is relevant to public services in the RSA.

The following project features have been developed for public services.

PF-PS-1. Coordination with Torrance Refining Company and Emergency Responders

Before construction of the project and during the advanced design stages, Metro would work with the Torrance Refining Company and Torrance Logistics Company, BNSF Railway, the City of Torrance, and other City entities responsible for emergency response to coordinate emergency communication systems so that, in the event of an emergency relating to flaring or other refinery operations-related hazards, Metro could hold or detour trains to avoid traveling near the refinery.

Page 3.15-17 – The first paragraph under the Police Services heading is revised as follows:

There are no police stations located within the RSA. The Hawthorne Police Department (PD) provides police services to the City of Hawthorne. The Los Angeles Sheriff's Department (LASD) provides professional public safety services to the City*y*~~ies~~ of Lawndale ~~and Inglewood~~. The Redondo Beach PD provides police protection services to the City of Redondo Beach. The Torrance PD provides police protection services to the City of Torrance. Police services are provided to the RSA by the station(s) noted in Table 3.15-8 and displayed in Figure 3.15-3. Table 3.15-8 includes the approximate distances of the police stations servicing the RSA to the Metro ROW and Hawthorne Boulevard.

Page 3.15-17 – The text under the Los Angeles Sheriff Department heading is revised as follows:

The LASD provides police services to the City of Lawndale from the South Los Angeles Station. *The City of Torrance is served by the Torrance Police Department.* ~~The City of Torrance and Redondo Beach~~ *The Torrance Transit C*~~c~~enter~~s plan to~~ include*s* space for transit security/police.

~~LASD~~ ~~substations~~. *The Redondo Beach Transit Center was completed without a dedicated police substation, but includes an office space to be used by the Redondo Beach Police Department on an as-needed basis.* Approximately 18,300 sworn and non-sworn personnel were budgeted in Fiscal Year 2019-2020, (which included more than 10,000 sworn deputies and over 8,000 non-sworn personnel [LASD, 2020]). In calendar year (CY) 2018, the South Los Angeles Station responded to a total of 2,355 reported incidents (LASD, 2018). ~~LASD did not respond to public outreach requests for information regarding average emergency response times for the South Los Angeles Station.~~ *LASD response times for emergency, priority, and routine calls for service are approximately 4.5, 10, and 55 minutes, respectively, for the South Los Angeles Station.*

4.20 CHAPTER 3.16 - OTHER CEQA CONSIDERATIONS

Page 3.16-1 – The last paragraph on the page is revised as follows:

Construction of the Proposed Project would create temporary construction-related jobs. However, the work requirements of most transportation construction projects are highly specialized such that construction workers remain at a job site only for the time in which their specific skills are needed to complete a particular phase of the construction process. The Proposed Project would draw from the existing regional pool of construction workers who typically move from project to project as work is available. The Construction Careers Policy and the Project Labor Agreement were approved by the Metro Board on January 26, 2012, subsequently renewed on January 26, 2017, to encourage construction employment and training opportunities to those who reside in economically disadvantaged areas on Metro construction projects. In addition, the Proposed Project-related construction workers would not be anticipated to relocate their households; permanent places of residence as a consequence of working on the Proposed Project and, therefore, no new permanent residents are expected to be generated during construction of the Proposed Project. Additionally, the number of jobs created by the Proposed Project is anticipated in the planned growth within the Southern California Association of Government's (SCAG) 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS). Accordingly, construction of the Proposed Project and Options would not induce substantial population growth or result in substantial use of existing community service facilities. *Since the release of the Draft EIR, SCAG has released and adopted its 2024-2050 RTP/SCS, Connect SoCal 2024. See Section 4.4 of this Final EIR for more information on how the information in Connect SoCal 2024 relates to this environmental review process.*

4.21 CHAPTER 4.0 - EVALUATION OF ALTERNATIVES

Page 4-25 – The following information was added to the text under the High-Frequency Bus Alternative:

The High-Frequency Bus (HFB) Alternative would implement a rapid bus service instead of a light rail extension. The bus line would be a local express service with some bus rapid transit (BRT) characteristics. The service may be as frequent as that proposed for light rail, though its ability to attract as much ridership would be less due to less travel time savings and amenities. The buses would operate in mixed-flow traffic with transit signal priority systems, which give priority to transit vehicles at signalized intersections by giving an early green signal or holding a green signal. There would be a total of four bus stops between the existing Redondo Beach (Marine) Station and Torrance TC, compared to two light rail stations in the Proposed Project (not including the existing Redondo Beach (Marine) Station and Torrance TC Station). *The HFB Alternative would also require a transfer at the Redondo Beach (Marine) Station in order for riders to continue further, increasing travel time and potential delays.* Travel times from end to

end would be about 25 minutes, which is faster than local bus service (approximately one hour, with a transfer), but slower than the travel times expected from the Proposed Project (approximately seven minutes). *The HFB Alternative would create a duplication of service for Torrance Line 8.* Stops would be located at existing bus stops or improved relocated stops. Physical improvements would be limited to new signs at bus stops, shelters as well with solar lighting, benches, and trash receptacles, as a minimum level of bus stop amenities. Where practical, the HFB Alternative may include curb extensions, elimination of street parking, or other improvements to the sidewalk area near new bus stops. Construction of the HFB Alternative would be limited to existing roadways and sidewalks, to implement potential minor improvements such as restriping, curb extensions, or bus stop amenities. Like the Proposed Project, this Alternative would not require a maintenance facility, as buses would be maintained at existing Metro facilities. Buses would have low-floor design to allow for faster and easier boarding and alighting.

Page 4-42 – The text under Section 4.5-3.4.1 Construction under the 170th/182nd Grade-Separated Light Rail Transit Alternative (LPA) is revised as follows:

Less than Significant Impact. Construction of the trench alignment under 170th and 182nd Streets would involve approximately 0.7 miles of excavation and would ~~increase~~ *lengthen* the duration of construction ~~compared~~ *relative* to the Proposed Project. Maximum daily emissions *during construction of the 170th/182nd Grade-Separated Light Rail Transit Alternative* would be slightly higher than *those of* the Proposed Project, though lower than the Trench Option, *and would remain below applicable SCAQMD mass daily thresholds despite the* ~~but emissions would remain below the applicable SCAQMD mass daily thresholds~~ *additional haul truck trips associated with the excavation activities.*

The maximum daily truck trips required to haul excavated material would be considerably fewer than those of the Trench Option, and the resulting maximum daily emissions would remain below the SCAQMD regional mass daily thresholds screening levels. This assessment used a scaling approach, applying a conservative estimate that the Trench Option would require up to 243 daily truckloads (486 one-way truck trips, generating approximately 89.4 pounds per day of NO_X emissions), while the 170th/182nd Alternative would require up to 172 daily truckloads (344 one-way truck trips, generating approximately 63.3 pounds per day of NO_X emissions) based on the volume of excavation and the forecasted schedule. When combined with other concurrent construction activities, the maximum daily NO_X emissions for the 170th/182nd Alternative would be approximately 84.2 pounds per day—compared to 110.3 pounds per day for the Trench Option—which remains below the SCAQMD threshold of 100 pounds per day. All other emissions would also remain below the corresponding SCAQQMD screening thresholds, consistent with the Trench Option analysis. Therefore, the 170th/182nd Grade-Separated Light Rail Transit Alternative would have a **less than significant impact** during construction related to air quality.

Page 4-42 – The text under Section 4.5-3.4.2 Operation under the 170th/182nd Grade-Separated Light Rail Transit Alternative (LPA) is revised as follows:

Less than Significant Impact. Operation of the trench alignment under 170th and 182nd Streets would not result in any differences in impacts, compared to the Proposed Project*, as it would have the same operational characteristics, including amount of VMT reduced*. The 170th/182nd Grade-Separated Light Rail Transit Alternative would have a less than significant impact during operation related to air quality.

Page 4-42 – The following language was revised within the text under Section 4.5-3.5.1 (Greenhouse Gas Emissions – Construction) under the 170th/182nd Grade-Separated Light Rail Transit Alternative (LPA):

> **Less than Significant Impact.** Construction of the trench alignment under 170th and 182nd Streets would take longer and generate more GHG emissions than the Proposed Project, though not as much as the Trench Option. However, the difference in *construction-related* GHG emissions would ***not*** be substantial and ~~there would not be conflicts with GHG plans~~ *would be offset over time through operational benefits, including reductions in regional on-road vehicle miles traveled (VMT). As disclosed in the Draft EIR, construction of the Proposed Project would require approximately 556,100 cubic yards of bulk material hauling, the Trench Option approximately 813,100 cubic yards, and the 170th/182nd Grade-Separated Light Rail Transit Alternative approximately 771,650 cubic yards. Because bulk material hauling is roughly proportional to HG emissions from haul truck trips, the 170th/182nd Grade-Separated Light Rail Transit Alternative would generate approximately 95 percent as much hauling-related GHG emissions as the Trench Option. Similar to the Proposed Project and Trench Option, construction-related GHG emissions under the 170th/182nd Grade-Separated Light Rail Transit Alternative would be offset by the reductions in regional vehicle travel emissions within less than 10 years of operations. The magnitude of temporary construction-phase GHG emissions would not be sufficient to impede or delay the region's effort. Therefore, construction of* the 170th/182nd Grade-Separated Light Rail Transit Alternative *would not conflict with any relevant plan for reducing GHG emissions* and would ~~have~~ *result in* a **less than significant impact** during construction related to GHG emissions.

Page 4-43 – In Section 4.5-3.6.2 Operation the following text was revised under the 170th/182nd Grade-Separated Light Rail Transit Alternative (LPA):

> **Less than Significant Impact with Mitigation/Significant and Unavoidable without MM-NOI-4.** Operation of the trench alignment under 170th and 182nd Streets would result in similar impacts as the Trench Option, as discussed in Section 4.3-2.6.2. The light rail trains would travel under 170th and 182nd Streets in a trench, and there would not be a need for light rail-grade crossing bells and gates. Implementation of mitigation measures MM-NOI-2 and MM-NOI-3 would install soundwalls and low impact frogs, reducing the light rail noise impacts in these areas to less than significant. However, the freight trains would generate noise impacts from warning horns at the at-grade crossings, and the combined light rail and freight noise would result in significant impacts to sensitive receivers. Like the Proposed Project, pursuant to PF-NV-1, the at-grade freight crossings for the 170th/182nd Grade-Separated Light Rail Transit Alternative would be designed and constructed to include all the safety infrastructure and improvements needed to allow the local jurisdictions to establish a quiet zone(s). Further, mitigation measure MM-NOI-4 would require Metro to support the cities of Redondo Beach, Lawndale, and Torrance in establishing a quiet zone(s) and for the cities to comply with FRA requirements for doing so. *As shown in Table 4.5-1, operational noise levels would be reduced to below the FTA noise criteria after implementation of mitigation.* Therefore, with implementation of mitigation measure MM-NOI-4, the 170th/182nd Grade-Separated Light Rail Transit Alternative would have a **less than significant impact with mitigation** during operation related to noise. If the local jurisdictions do not establish a quiet zone(s) to reduce freight horn noise, the 170th/182nd Grade-Separated Light Rail Transit Alternative would have a **significant and unavoidable impact without MM-NOI-4** during operation.

Table 4.5-1. LPA – Combined Light Rail and Freight Relocation Mitigated Noise Impacts

Cluster No.	Land Use Category	Noise Level (Cat 2 dBA, L_{dn} or Cat 3 dBA, L_{eq})				Impact After Mitigation
		Existing	Unmitigated Freight and LRT Combined	Mitigated Freight and LRT Combined	Impact Threshold[1]	
A1	2	67.0	63.0	54.0	62	Less Than Significant With Mitigation
A2	2	67.0	63.0	55.0	62	Less Than Significant With Mitigation
A3	2	67.0	59.0	59.0	62	Less than Significant
A4	2	70.0	62.0	57.0	64	Less than Significant
A5	2	70.0	62.0	57.0	64	Less than Significant
A6	2	70.0	63.0	57.0	64	Less than Significant
A7	2	70.0	63.0	58.0	64	Less than Significant
B1	3	71.0	73.0	61.0	70	Less Than Significant With Mitigation
B2	2	66.0	67.0	60.0	61	Less Than Significant With Mitigation
B3	2	65.0	64.0	59.0	61	Less Than Significant With Mitigation
B4	2	65.0	62.0	57.0	61	Less Than Significant With Mitigation
B5	2	67.0	70.0	61.0	62	Less Than Significant With Mitigation
B6	2	66.0	65.0	59.0	61	Less Than Significant With Mitigation
B7	2	65.0	63.0	57.0	61	Less Than Significant With Mitigation
B8	2	71.0	70.0	62.0	65	Less Than Significant With Mitigation
B9	2	70.0	65.0	60.0	65	Less Than Significant With Mitigation
B10	2	70.0	63.0	57.0	64	Less than Significant
B11	2	71.0	70.0	62.0	65	Less Than Significant With Mitigation
B12	2	70.0	65.0	60.0	65	Less Than Significant With Mitigation
B13	2	70.0	63.0	57.0	64	Less than Significant
B14	2	71.0	70.0	59.0	65	Less Than Significant With Mitigation
B15	2	70.0	65.0	55.0	65	Less Than Significant With Mitigation
B16	2	70.0	63.0	53.0	64	Less than Significant
B17	2	61.0	65.0	55.0	58	Less Than Significant With Mitigation
B18	2	58.0	62.0	52.0	57	Less Than Significant With Mitigation
B19	2	57.0	60.0	49.0	56	Less Than Significant With Mitigation

Cluster No.	Land Use Category	Noise Level (Cat 2 dBA, L_{dn} or Cat 3 dBA, L_{eq})				Impact After Mitigation
		Existing	Unmitigated Freight and LRT Combined	Mitigated Freight and LRT Combined	Impact Threshold[1]	
B20	2	61.0	65.0	55.0	58	Less Than Significant With Mitigation
B21	2	58.0	62.0	52.0	57	Less Than Significant With Mitigation
B22	2	57.0	60.0	49.0	56	Less Than Significant With Mitigation
B23	2	61.0	65.0	56.0	58	Less Than Significant With Mitigation
B24	2	58.0	63.0	53.0	57	Less Than Significant With Mitigation
B25	2	57.0	60.0	50.0	56	Less Than Significant With Mitigation
B26	2	61.0	65.0	56.0	58	Less Than Significant With Mitigation
B27	2	58.0	63.0	53.0	57	Less Than Significant With Mitigation
B28	2	57.0	60.0	51.0	56	Less Than Significant With Mitigation
B29	2	61.0	65.0	54.0	58	Less Than Significant With Mitigation
B30	2	58.0	63.0	51.0	57	Less Than Significant With Mitigation
B31	2	57.0	60.0	49.0	56	Less Than Significant With Mitigation
B32	2	61.0	65.0	55.0	58	Less Than Significant With Mitigation
B33	2	58.0	63.0	52.0	57	Less Than Significant With Mitigation
B34	2	57.0	60.0	49.0	56	Less Than Significant With Mitigation
B35	2	71.0	71.0	60.0	65	Less Than Significant With Mitigation
B36	2	66.0	67.0	57.0	61	Less Than Significant With Mitigation
B37	2	65.0	64.0	55.0	61	Less Than Significant With Mitigation
B38	2	67.0	74.0	61.0	62	Less Than Significant With Mitigation
B39	2	66.0	67.0	57.0	61	Less Than Significant With Mitigation
B40	2	65.0	64.0	55.0	61	Less Than Significant With Mitigation
B41	2	71.0	72.0	60.0	65	Less Than Significant With Mitigation
B42	2	70.0	68.0	58.0	65	Less Than Significant With Mitigation

Cluster No.	Land Use Category	Noise Level (Cat 2 dBA, L_{dn} or Cat 3 dBA, L_{eq})				Impact After Mitigation
		Existing	Unmitigated Freight and LRT Combined	Mitigated Freight and LRT Combined	Impact Threshold[1]	
B43	2	70.0	64.0	55.0	64	Less Than Significant With Mitigation
B44	2	71.0	72.0	61.0	65	Less Than Significant With Mitigation
B45	2	70.0	68.0	57.0	65	Less Than Significant With Mitigation
B46	2	70.0	64.0	54.0	64	Less Than Significant With Mitigation
B47	2	62.0	68.0	55.0	59	Less Than Significant With Mitigation
B48	2	59.0	64.0	52.0	57	Less Than Significant With Mitigation
B49	2	58.0	60.0	48.0	56	Less Than Significant With Mitigation
B50	2	62.0	68.0	54.0	59	Less Than Significant With Mitigation
B51	2	59.0	64.0	52.0	57	Less Than Significant With Mitigation
B52	2	58.0	60.0	48.0	56	Less Than Significant With Mitigation
B53	2	62.0	68.0	55.0	59	Less Than Significant With Mitigation
B54	2	59.0	64.0	52.0	57	Less Than Significant With Mitigation
B55	2	58.0	60.0	48.0	56	Less Than Significant With Mitigation
B56	2	62.0	68.0	55.0	59	Less Than Significant With Mitigation
B57	2	59.0	64.0	52.0	57	Less Than Significant With Mitigation
B58	2	58.0	60.0	48.0	56	Less Than Significant With Mitigation
B59	2	62.0	68.0	54.0	59	Less Than Significant With Mitigation
B60	2	59.0	64.0	51.0	57	Less Than Significant With Mitigation
B61	2	58.0	60.0	47.0	56	Less Than Significant With Mitigation
B62	2	62.0	68.0	55.0	59	Less Than Significant With Mitigation
B63	2	59.0	64.0	51.0	57	Less Than Significant With Mitigation
B64	2	58.0	60.0	48.0	56	Less Than Significant With Mitigation
C1	2	61.0	65.0	54.0	58	Less Than Significant With Mitigation

Cluster No.	Land Use Category	Noise Level (Cat 2 dBA, L_{dn} or Cat 3 dBA, L_{eq})				Impact After Mitigation
		Existing	Unmitigated Freight and LRT Combined	Mitigated Freight and LRT Combined	Impact Threshold[1]	
C2	2	59.0	63.0	52.0	57	Less Than Significant With Mitigation
C3	2	57.0	60.0	49.0	56	Less Than Significant With Mitigation
C4	2	61.0	65.0	54.0	58	Less Than Significant With Mitigation
C5	2	59.0	63.0	52.0	57	Less Than Significant With Mitigation
C6	2	57.0	60.0	49.0	56	Less Than Significant With Mitigation
C7	2	61.0	65.0	55.0	58	Less Than Significant With Mitigation
C8	2	59.0	63.0	52.0	57	Less Than Significant With Mitigation
C9	2	57.0	60.0	49.0	56	Less Than Significant With Mitigation
C10	2	61.0	65.0	55.0	58	Less Than Significant With Mitigation
C11	2	59.0	63.0	52.0	57	Less Than Significant With Mitigation
C12	2	57.0	60.0	49.0	56	Less Than Significant With Mitigation
C13	2	61.0	65.0	55.0	58	Less Than Significant With Mitigation
C14	2	59.0	63.0	52.0	57	Less Than Significant With Mitigation
C15	2	57.0	60.0	49.0	56	Less Than Significant With Mitigation
C16	2	61.0	61.0	53.0	58	Less Than Significant With Mitigation
C17	2	59.0	59.0	51.0	57	Less Than Significant With Mitigation
C18	2	57.0	55.0	47.0	56	Less than Significant
C19	2	61.0	61.0	52.0	58	Less Than Significant With Mitigation
C20	2	59.0	58.0	50.0	57	Less Than Significant With Mitigation
C21	2	57.0	54.0	46.0	56	Less than Significant
C22	2	62.0	68.0	54.0	59	Less Than Significant With Mitigation
C23	2	59.0	64.0	50.0	57	Less Than Significant With Mitigation
C24	2	58.0	60.0	47.0	56	Less Than Significant With Mitigation
C25	2	61.0	68.0	55.0	58	Less Than Significant With Mitigation

Cluster No.	Land Use Category	Noise Level (Cat 2 dBA, L_{dn} or Cat 3 dBA, L_{eq})				Impact After Mitigation
		Existing	Unmitigated Freight and LRT Combined	Mitigated Freight and LRT Combined	Impact Threshold[1]	
C26	2	59.0	64.0	50.0	57	Less Than Significant With Mitigation
C27	2	57.0	60.0	47.0	56	Less Than Significant With Mitigation
C28	2	61.0	68.0	55.0	58	Less Than Significant With Mitigation
C29	2	59.0	64.0	50.0	57	Less Than Significant With Mitigation
C30	2	57.0	60.0	47.0	56	Less Than Significant With Mitigation
C31	2	61.0	68.0	55.0	58	Less Than Significant With Mitigation
C32	2	59.0	64.0	50.0	57	Less Than Significant With Mitigation
C33	2	57.0	60.0	47.0	56	Less Than Significant With Mitigation
C34	2	61.0	68.0	55.0	58	Less Than Significant With Mitigation
C35	2	59.0	64.0	50.0	57	Less Than Significant With Mitigation
C36	2	57.0	60.0	47.0	56	Less Than Significant With Mitigation
C37	2	61.0	63.0	55.0	59	Less Than Significant With Mitigation
C38	2	59.0	60.0	51.0	57	Less Than Significant With Mitigation
C39	2	57.0	57.0	47.0	56	Less Than Significant With Mitigation
C40	2	61.0	62.0	55.0	59	Less Than Significant With Mitigation
C41	2	59.0	58.0	50.0	57	Less Than Significant With Mitigation
C42	2	57.0	55.0	47.0	56	Less than Significant
D1	2	61.0	60.0	54.0	58	Less Than Significant With Mitigation
D2	2	59.0	58.0	51.0	57	Less Than Significant With Mitigation
D3	2	58.0	55.0	48.0	57	Less than Significant
D4	2	61.0	60.0	54.0	58	Less Than Significant With Mitigation
D5	2	59.0	57.0	51.0	57	Less Than Significant With Mitigation
D6	2	58.0	55.0	49.0	57	Less than Significant
D7	2	57.0	54.0	47.0	56	Less than Significant
D8	2	65.0	65.0	57.0	61	Less Than Significant With Mitigation

Cluster No.	Land Use Category	Noise Level (Cat 2 dBA, L_{dn} or Cat 3 dBA, L_{eq})				Impact After Mitigation
		Existing	Unmitigated Freight and LRT Combined	Mitigated Freight and LRT Combined	Impact Threshold[1]	
D9	2	65.0	65.0	57.0	61	Less Than Significant With Mitigation
D10	2	65.0	65.0	57.0	61	Less Than Significant With Mitigation
D11	2	65.0	65.0	57.0	61	Less Than Significant With Mitigation
D12	2	65.0	65.0	57.0	61	Less Than Significant With Mitigation
D13	2	66.0	65.0	57.0	62	Less Than Significant With Mitigation
D14	2	66.0	65.0	58.0	62	Less Than Significant With Mitigation
D15	2	61.0	56.0	55.0	58	Less than Significant
D16	2	61.0	66.0	56.0	58	Less Than Significant With Mitigation
D17	2	59.0	57.0	50.0	57	Less Than Significant With Mitigation
D18	2	58.0	55.0	49.0	57	Less than Significant
D19	2	57.0	54.0	48.0	56	Less than Significant
D20	2	59.0	57.0	50.0	57	Less Than Significant With Mitigation
D21	2	59.0	57.0	50.0	57	Less Than Significant With Mitigation
D22	2	59.0	57.0	51.0	57	Less Than Significant With Mitigation
D23	2	62.0	57.0	51.0	59	Less than Significant
D24	2	61.0	61.0	51.0	58	Less Than Significant With Mitigation
D25	2	61.0	59.0	49.0	58	Less Than Significant With Mitigation
D26	2	61.0	62.0	55.0	59	Less Than Significant With Mitigation
D27	2	59.0	58.0	51.0	57	Less Than Significant With Mitigation
D28	2	57.0	55.0	47.0	56	Less than Significant
D29	2	61.0	62.0	55.0	59	Less Than Significant With Mitigation
D30	2	59.0	58.0	51.0	57	Less Than Significant With Mitigation
D31	2	57.0	55.0	47.0	56	Less than Significant
D32	2	62.0	62.0	55.0	59	Less Than Significant With Mitigation
D33	2	59.0	59.0	51.0	57	Less Than Significant With Mitigation
D34	2	57.0	54.0	47.0	56	Less than Significant

Cluster No.	Land Use Category	Noise Level (Cat 2 dBA, L_{dn} or Cat 3 dBA, L_{eq})				Impact After Mitigation
		Existing	Unmitigated Freight and LRT Combined	Mitigated Freight and LRT Combined	Impact Threshold[1]	
D35	2	62.0	63.0	55.0	59	Less Than Significant With Mitigation
D36	2	59.0	59.0	51.0	57	Less Than Significant With Mitigation
D37	2	57.0	55.0	47.0	56	Less than Significant
D38	2	62.0	63.0	55.0	59	Less Than Significant With Mitigation
D39	2	59.0	59.0	51.0	57	Less Than Significant With Mitigation
D40	2	57.0	55.0	47.0	56	Less than Significant
D41	2	63.0	63.0	56.0	60	Less Than Significant With Mitigation
D42	2	61.0	58.0	50.0	59	Less than Significant
D43	2	61.0	54.0	45.0	58	Less than Significant
D44	2	63.0	68.0	58.0	60	Less Than Significant With Mitigation
D45	2	61.0	59.0	50.0	59	Less Than Significant With Mitigation
D46	2	61.0	54.0	45.0	58	Less than Significant
D47	2	61.0	68.0	57.0	58	Less Than Significant With Mitigation
D48	2	61.0	59.0	53.0	58	Less Than Significant With Mitigation
D49	2	61.0	54.0	48.0	58	Less than Significant
D50	2	61.0	68.0	57.0	58	Less Than Significant With Mitigation
D51	2	61.0	64.0	54.0	58	Less Than Significant With Mitigation
D52	2	61.0	59.0	49.0	58	Less Than Significant With Mitigation
E1	2	75.0	65.0	60.0	65	Less Than Significant With Mitigation
E2	2	58.0	69.0	53.0	57	Less Than Significant With Mitigation
E3	2	57.0	60.0	43.0	56	Less Than Significant With Mitigation
E4	2	58.0	74.0	54.0	57	Less Than Significant With Mitigation
E5	2	57.0	66.0	48.0	56	Less Than Significant With Mitigation
E6	2	57.0	65.0	47.0	56	Less Than Significant With Mitigation
E7	2	57.0	57.0	45.0	56	Less Than Significant With Mitigation
E8	2	57.0	61.0	48.0	56	Less Than Significant With Mitigation

Cluster No.	Land Use Category	Noise Level (Cat 2 dBA, L_{dn} or Cat 3 dBA, L_{eq})				Impact After Mitigation
		Existing	Unmitigated Freight and LRT Combined	Mitigated Freight and LRT Combined	Impact Threshold[1]	
E9	2	57.0	58.0	45.0	56	Less Than Significant With Mitigation
F1	3	60.0	73.0	55.0	63	Less Than Significant With Mitigation
F2	2	64.0	64.0	57.0	60	Less Than Significant With Mitigation
F3	2	64.0	64.0	56.0	60	Less Than Significant With Mitigation
F4	2	64.0	64.0	56.0	60	Less Than Significant With Mitigation
F5	2	57.0	56.0	47.0	56	Less Than Significant With Mitigation
F6	2	57.0	54.0	48.0	56	Less than Significant
F7	2	63.0	63.0	56.0	60	Less Than Significant With Mitigation
F8	2	57.0	55.0	47.0	56	Less than Significant
F9	2	57.0	53.0	45.0	56	Less than Significant
F10	2	61.0	61.0	54.0	58	Less Than Significant With Mitigation
F11	2	61.0	60.0	54.0	58	Less Than Significant With Mitigation
F12	2	59.0	57.0	51.0	57	Less Than Significant With Mitigation
F13	2	57.0	54.0	46.0	56	Less than Significant
F14	2	61.0	61.0	54.0	58	Less Than Significant With Mitigation
F15	2	59.0	58.0	52.0	57	Less Than Significant With Mitigation
F16	2	57.0	54.0	46.0	56	Less than Significant
F17	2	61.0	61.0	54.0	58	Less Than Significant With Mitigation
F18	2	57.0	55.0	47.0	56	Less than Significant
F19	2	56.0	53.0	43.0	56	Less than Significant
F20	3	60.0	71.0	53.0	63	Less Than Significant With Mitigation
G1	2	60.0	60.0	53.0	58	Less Than Significant With Mitigation
G2	2	57.0	54.0	48.0	56	Less than Significant
G3	2	57.0	54.0	47.0	56	Less than Significant
G4	2	56.0	47.0	47.0	56	Less than Significant
G5	2	56.0	58.0	53.0	56	Less Than Significant With Mitigation
G6	2	56.0	56.0	51.0	56	Less Than Significant With Mitigation
G7	2	57.0	62.0	55.0	56	Less Than Significant With Mitigation

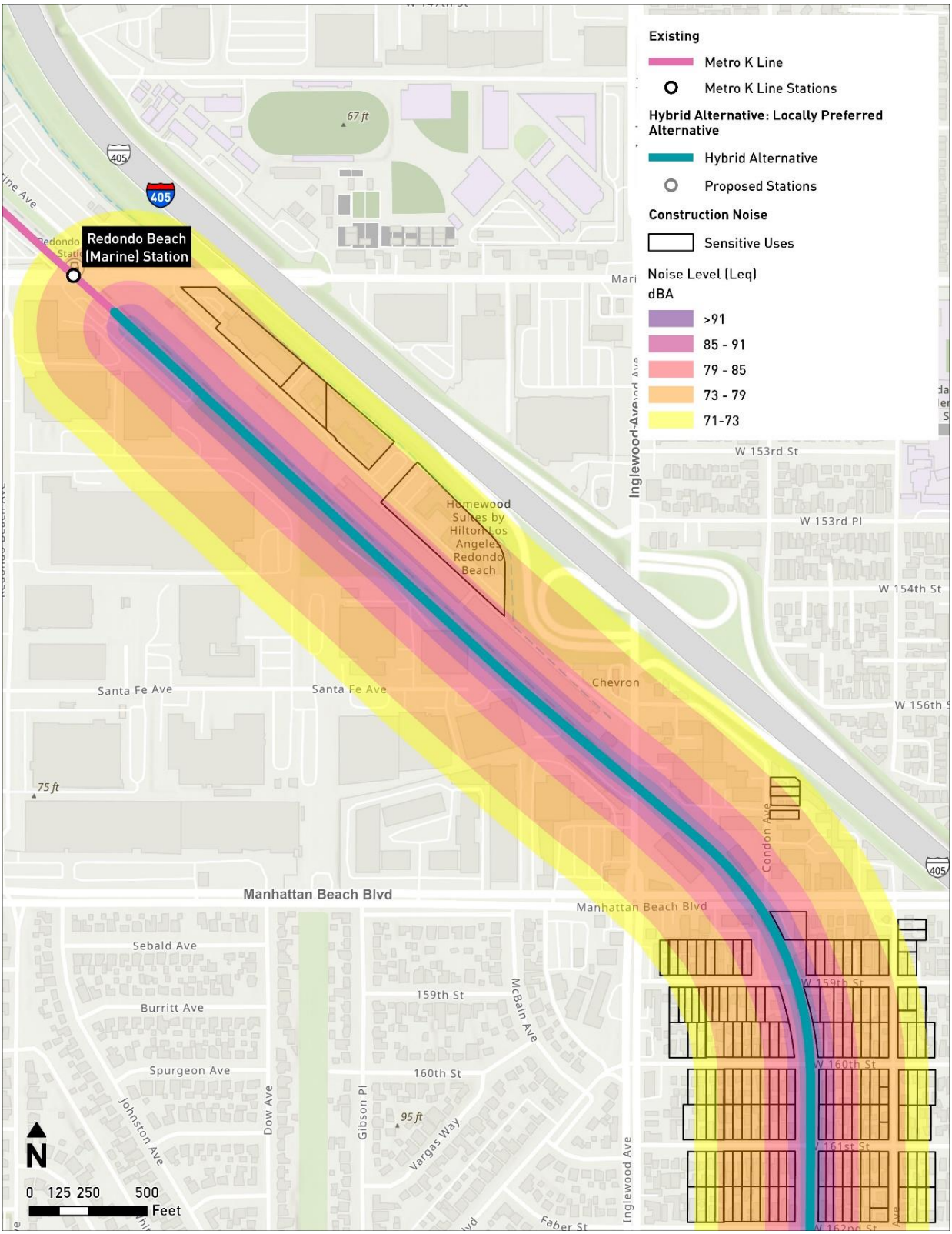
Cluster No.	Land Use Category	Noise Level (Cat 2 dBA, L_{dn} or Cat 3 dBA, L_{eq})				Impact After Mitigation
		Existing	Unmitigated Freight and LRT Combined	Mitigated Freight and LRT Combined	Impact Threshold[1]	
G8	2	56.0	54.0	49.0	56	Less than Significant
G9	2	56.0	54.0	47.0	56	Less than Significant
G10	2	56.0	48.0	46.0	56	Less than Significant
G11	2	56.0	56.0	53.0	56	Less Than Significant With Mitigation
G12	2	57.0	58.0	55.0	56	Less Than Significant With Mitigation
G13	2	56.0	54.0	51.0	56	Less than Significant
G14	2	56.0	53.0	50.0	56	Less than Significant
G15	2	75.0	56.0	52.0	65	Less than Significant
G16	2	61.0	60.0	55.0	59	Less Than Significant With Mitigation
G17	2	61.0	61.0	56.0	59	Less Than Significant With Mitigation
G18	2	61.0	63.0	58.0	59	Less Than Significant With Mitigation
G19	2	61.0	60.0	56.0	59	Less Than Significant With Mitigation
G20	2	62.0	71.0	54.0	59	Less Than Significant With Mitigation
G21	2	61.0	68.0	51.0	59	Less Than Significant With Mitigation
G22	2	61.0	66.0	49.0	59	Less Than Significant With Mitigation
G23	2	61.0	66.0	49.0	59	Less Than Significant With Mitigation
G24	2	61.0	59.0	48.0	59	Less Than Significant With Mitigation
G25	2	61.0	59.0	48.0	59	Less Than Significant With Mitigation
G26	2	61.0	59.0	47.0	59	Less Than Significant With Mitigation
G27	2	62.0	70.0	57.0	59	Less Than Significant With Mitigation
G28	2	62.0	69.0	53.0	59	Less Than Significant With Mitigation
G29	2	61.0	69.0	52.0	59	Less Than Significant With Mitigation
G30	2	61.0	66.0	49.0	59	Less Than Significant With Mitigation
G31	2	75.0	64.0	59.0	65	Less than Significant
H1	2	70.0	57.0	57.0	64	Less than Significant
H2	2	70.0	54.0	54.0	64	Less than Significant

Source: TAHA, 2025

[1]The impact threshold is compared to (unmitigated freight and LRT combined) and (mitigated freight and LRT combined) noise level to determine impact after mitigation.

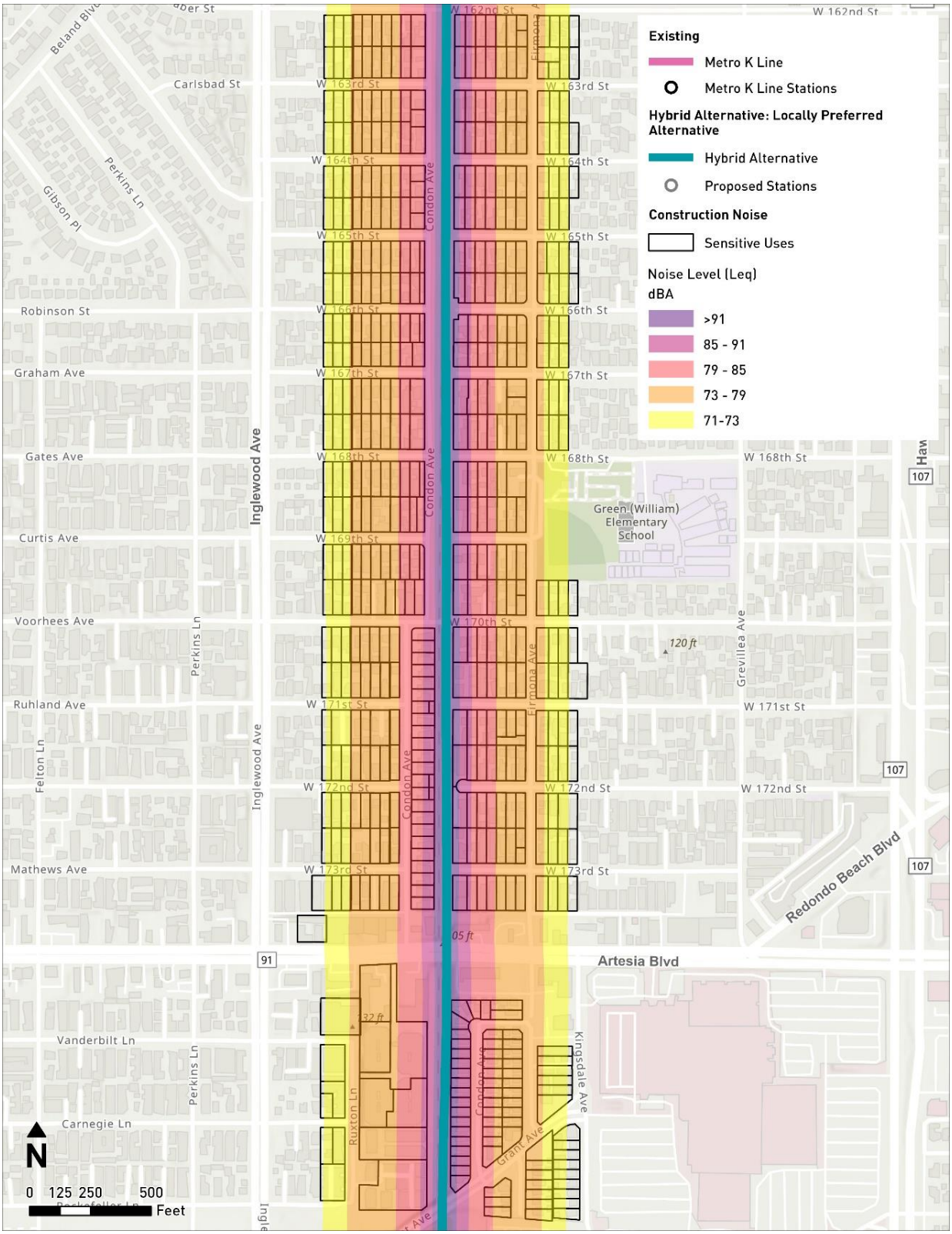
Page 4-43 – The following figures were added to accompany the noise analysis showing where construction and operational noise impacts described in the text would occur under the 170th/182nd Grade-Separated Light Rail Transit Alternative (LPA):

Figure 4-1. LPA Construction Noise Impacts (1 of 4)



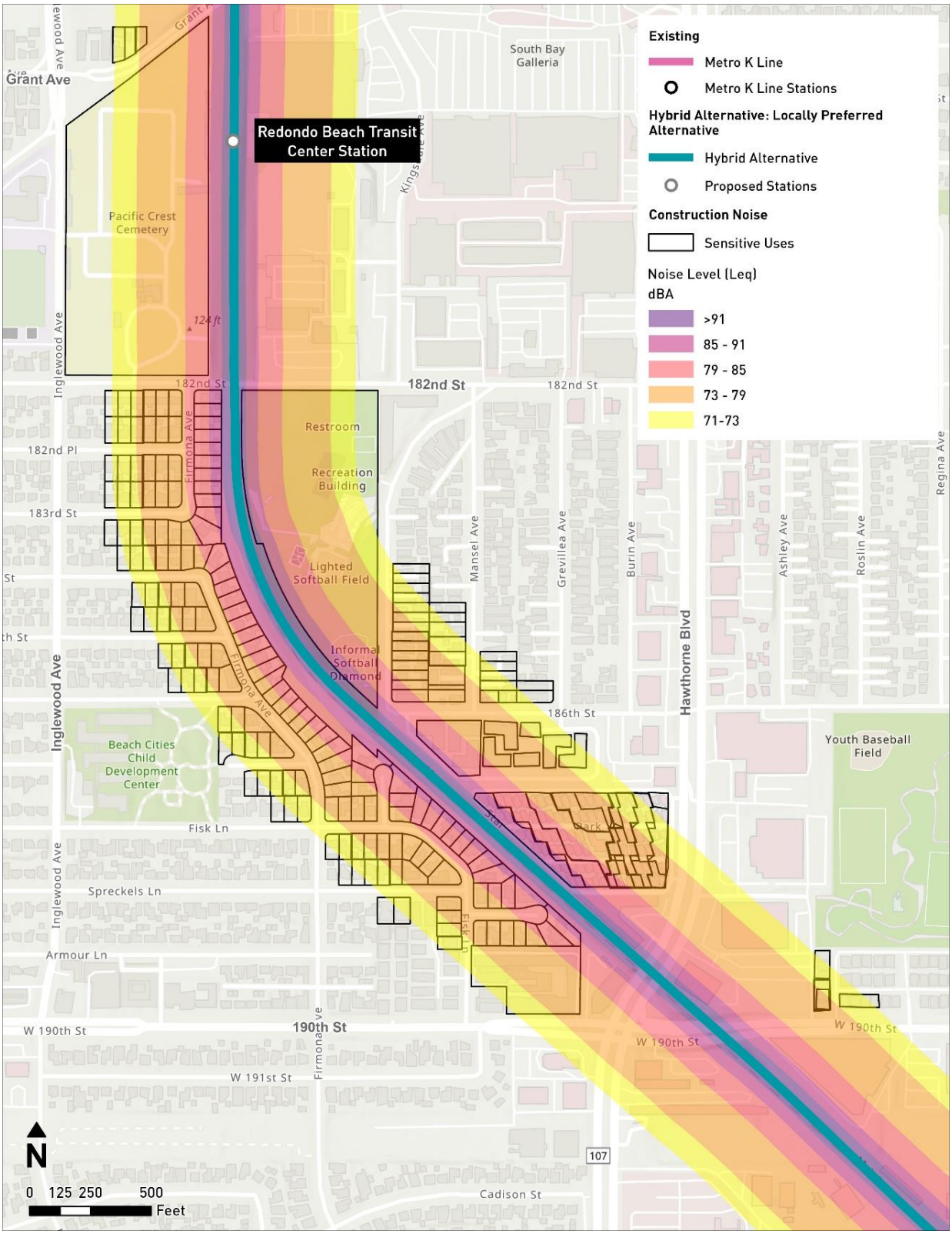
Source: TAHA, 2025

Figure 4-2. LPA Construction Noise Impacts (2 of 4)



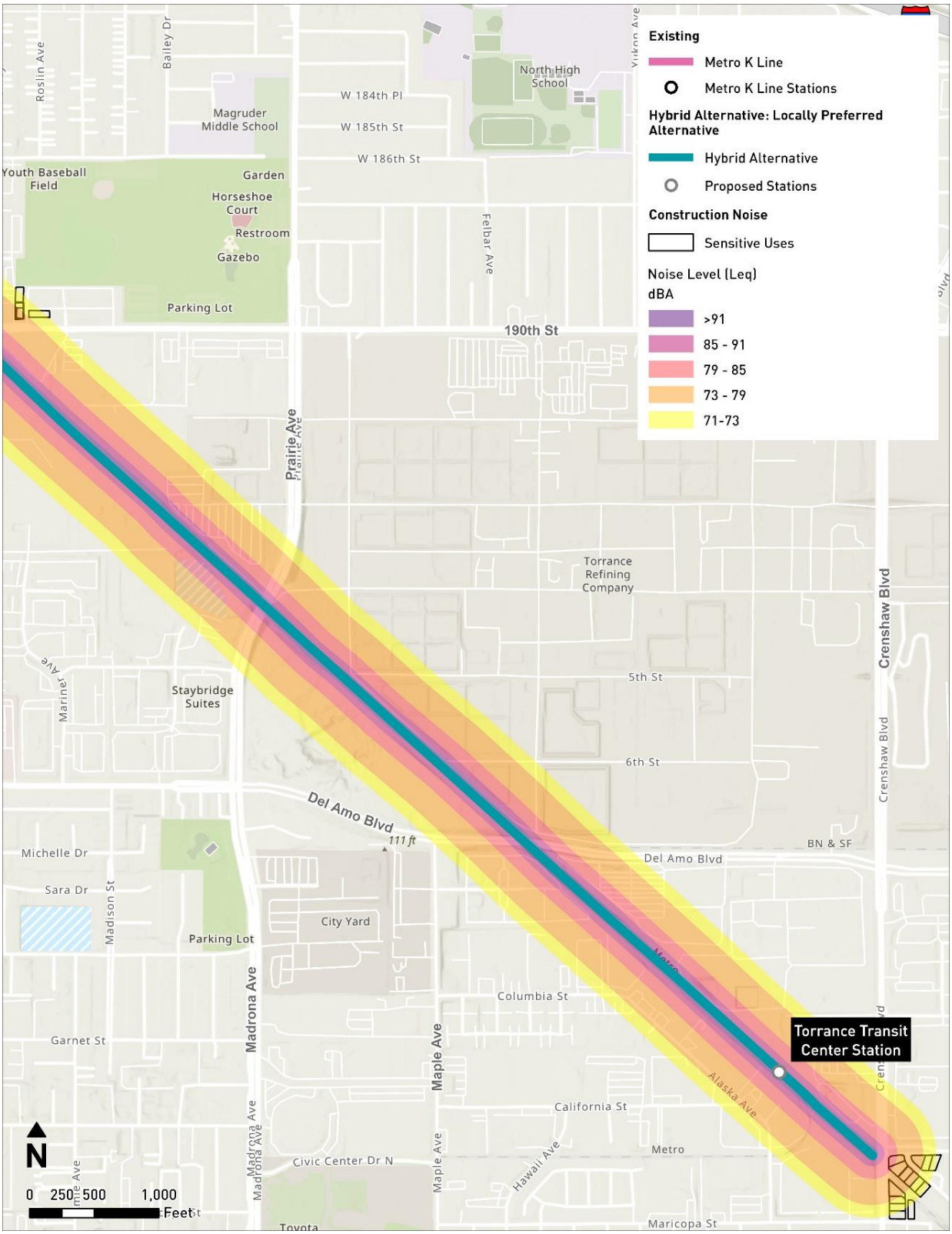
Source: TAHA, 2025

Figure 4-3. LPA Construction Noise Impacts (3 of 4)



Source: TAHA, 2025

Figure 4-4. LPA Construction Noise Impacts (4 of 4)



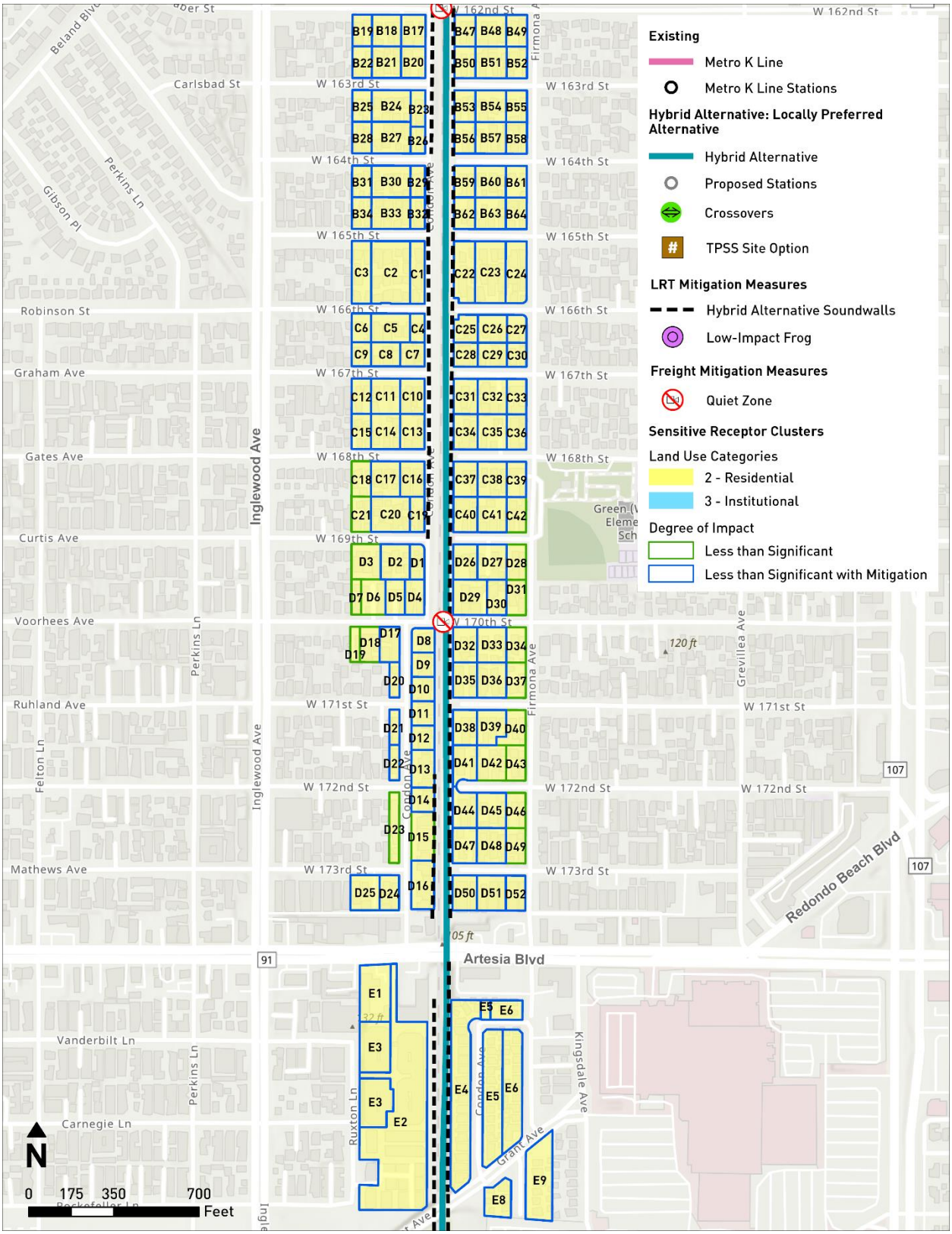
Source: TAHA, 2025

Figure 4-5. LPA - Mitigated Operational Noise Impacts (1 of 5)



Source: TAHA, 2025

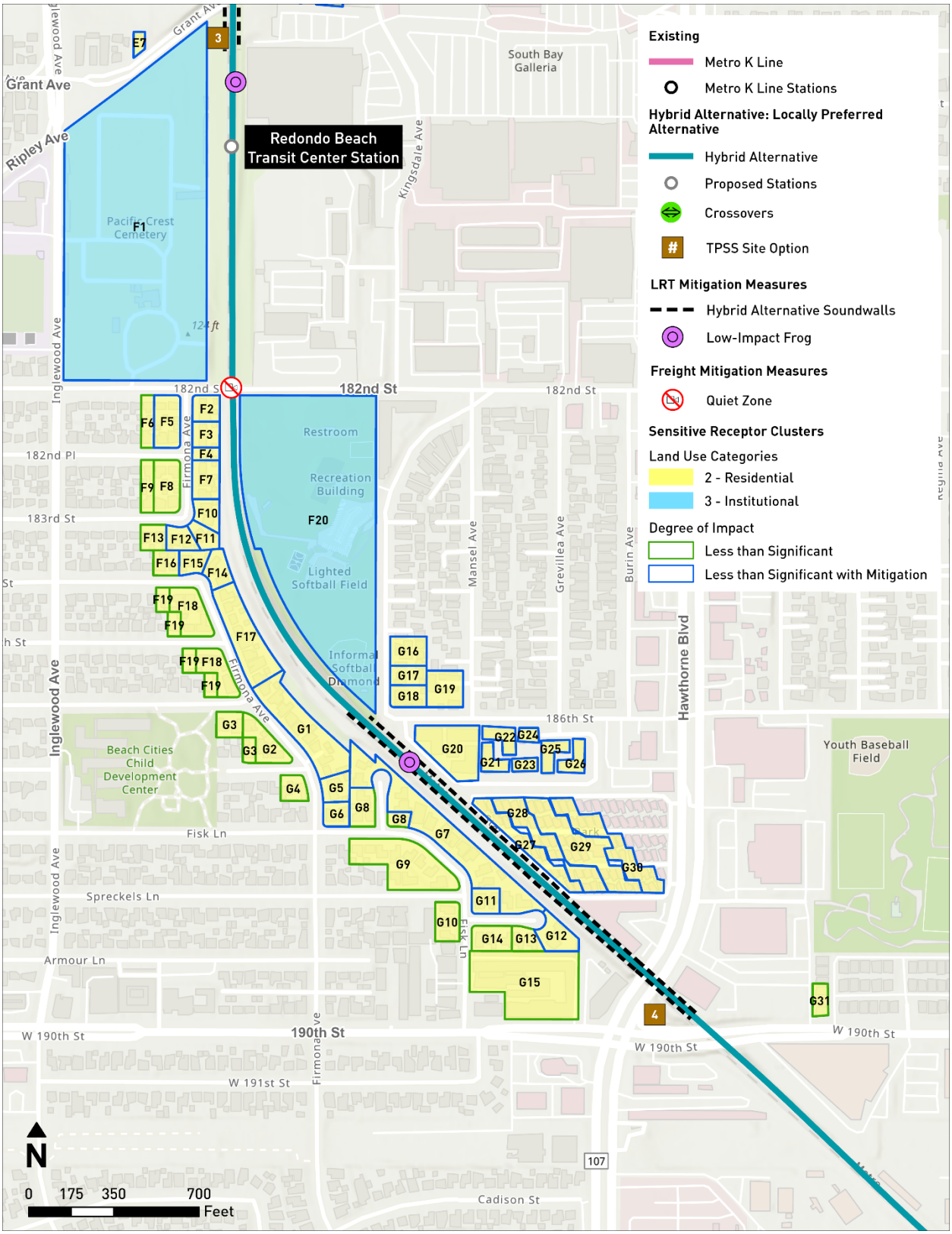
Figure 4-6. LPA – Mitigated Operational Noise Impacts (2 of 5)



Source: TAHA, 2025

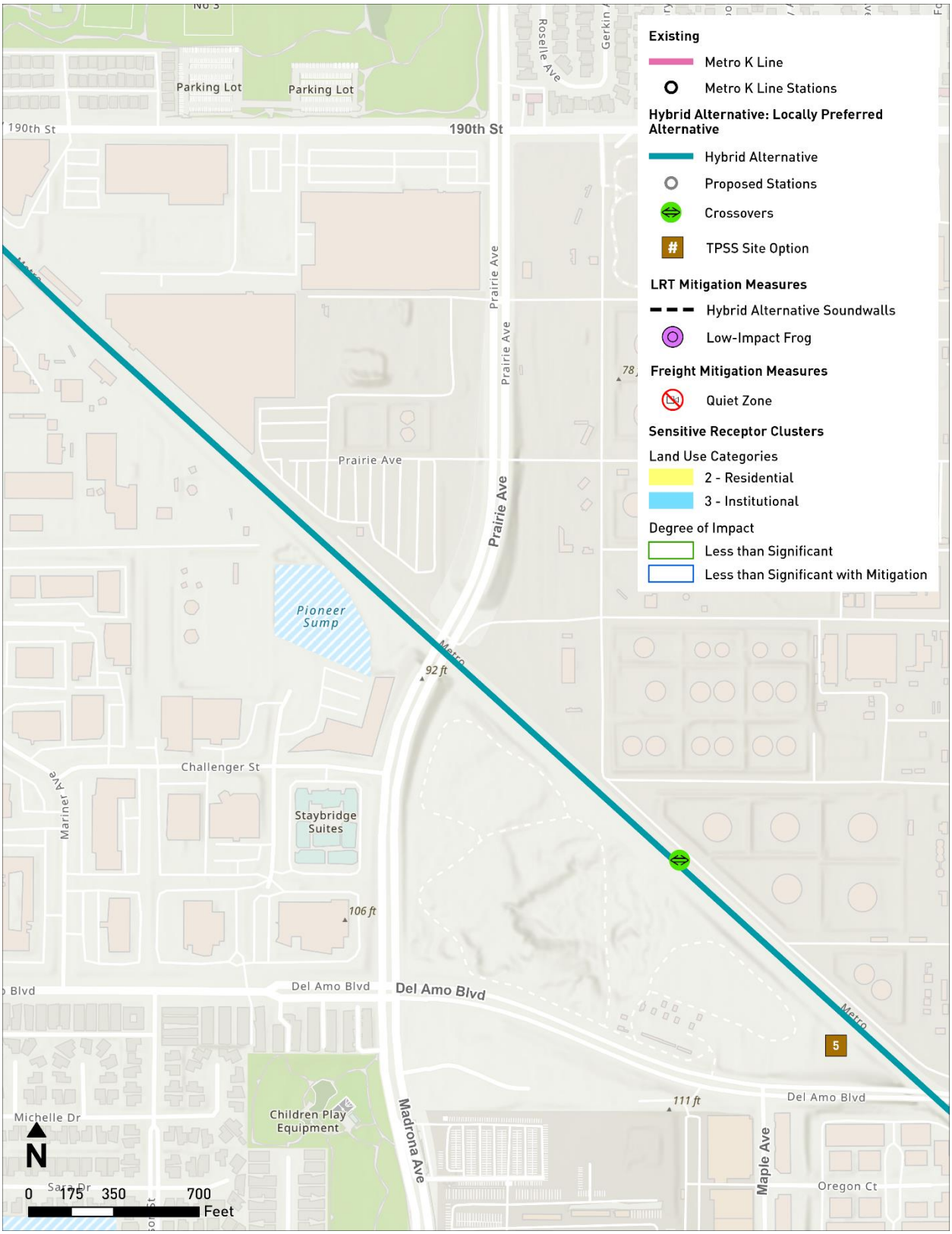
Metro

Figure 4-7. LPA – Mitigated Operational Noise Impacts (3 of 5)



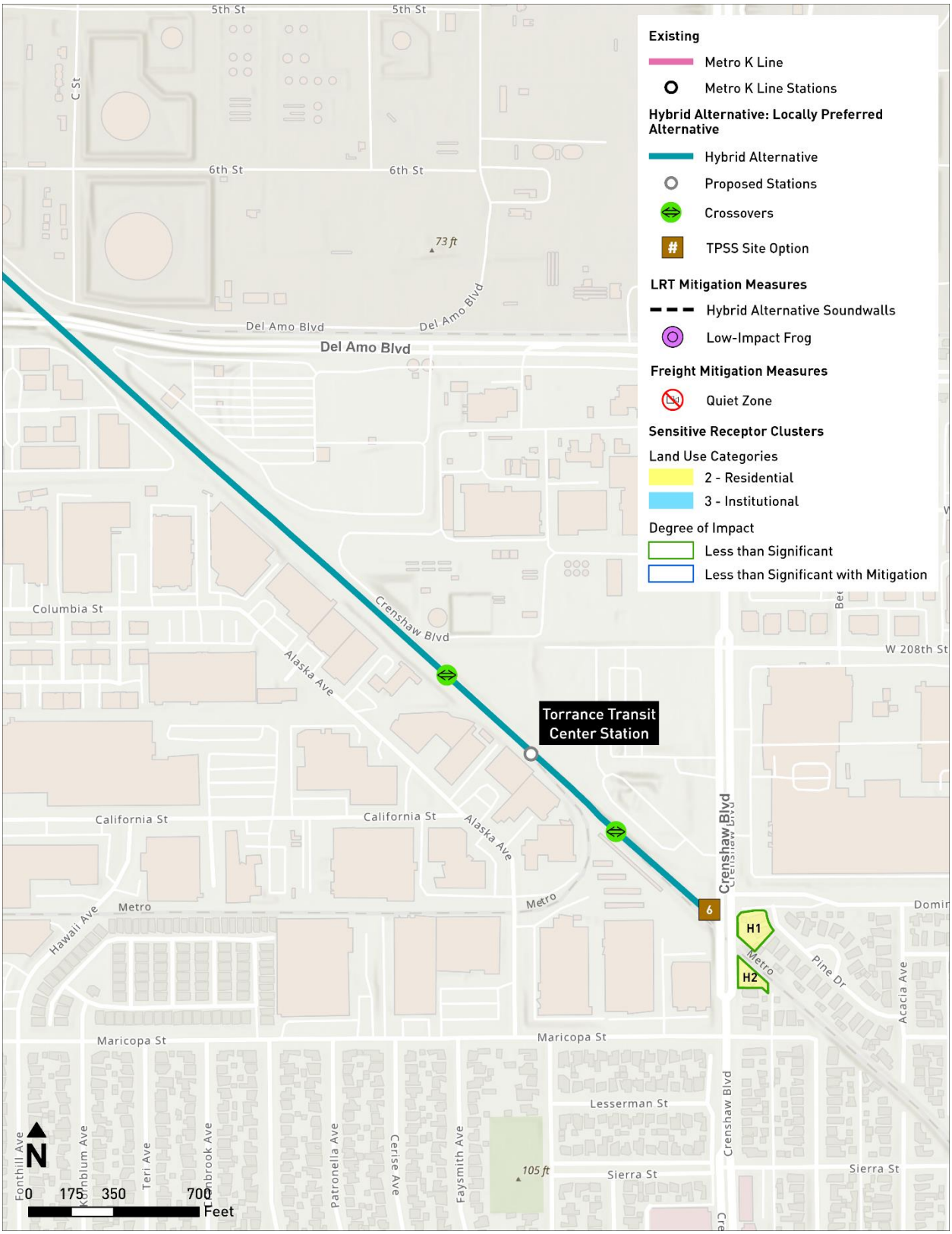
Source: TAHA, 2025

Figure 4-8. LPA – Mitigated Operational Noise Impacts (4 of 5)



Source: TAHA, 2025

Figure 4-9. LPA – Mitigated Operational Noise Impacts (5 of 5)



Source: TAHA, 2025

Page 4-44 – The following figures and table were added to accompany the vibration analysis showing where construction and operational vibration impacts described in the text would occur under the 170th/182nd Grade-Separated Light Rail Transit Alternative (LPA):

Table 4.5-2. Summary of LPA Operational Ground-borne Vibration Annoyance Impacts

From	To	LRT			Freight		
		Number of Residences Impacted[1]		Worst-Case Vibration Level (VdB)	Number of Residences Impacted[1]		Worst-Case Vibration Level (VdB)
		West of ROW	East of ROW		West of ROW	East of ROW	
Existing Redondo Beach Station	Santa Fe Ave	0	0	-	0	0	-
Santa Fe Ave	Manhattan Beach Blvd	0	0	-	0	0	-
Manhattan Beach Blvd	160th St	0	0	-	3	0	88
160th St	Artesia Blvd	23	42	80	0	0	0
Artesia Blvd	Grant Ave	5	31	82	0	0	-
Grant Ave	182nd St	0	0	-	0	0	-
182nd St	190th St	61	70	93	36	11	87
190th St	Torrance TC Station	0	0	-	0	0	-

Source: AECOM, 2022

LRT = light rail transit; VdB = decibel notation; ROW = right-of-way; TC = Transit Center

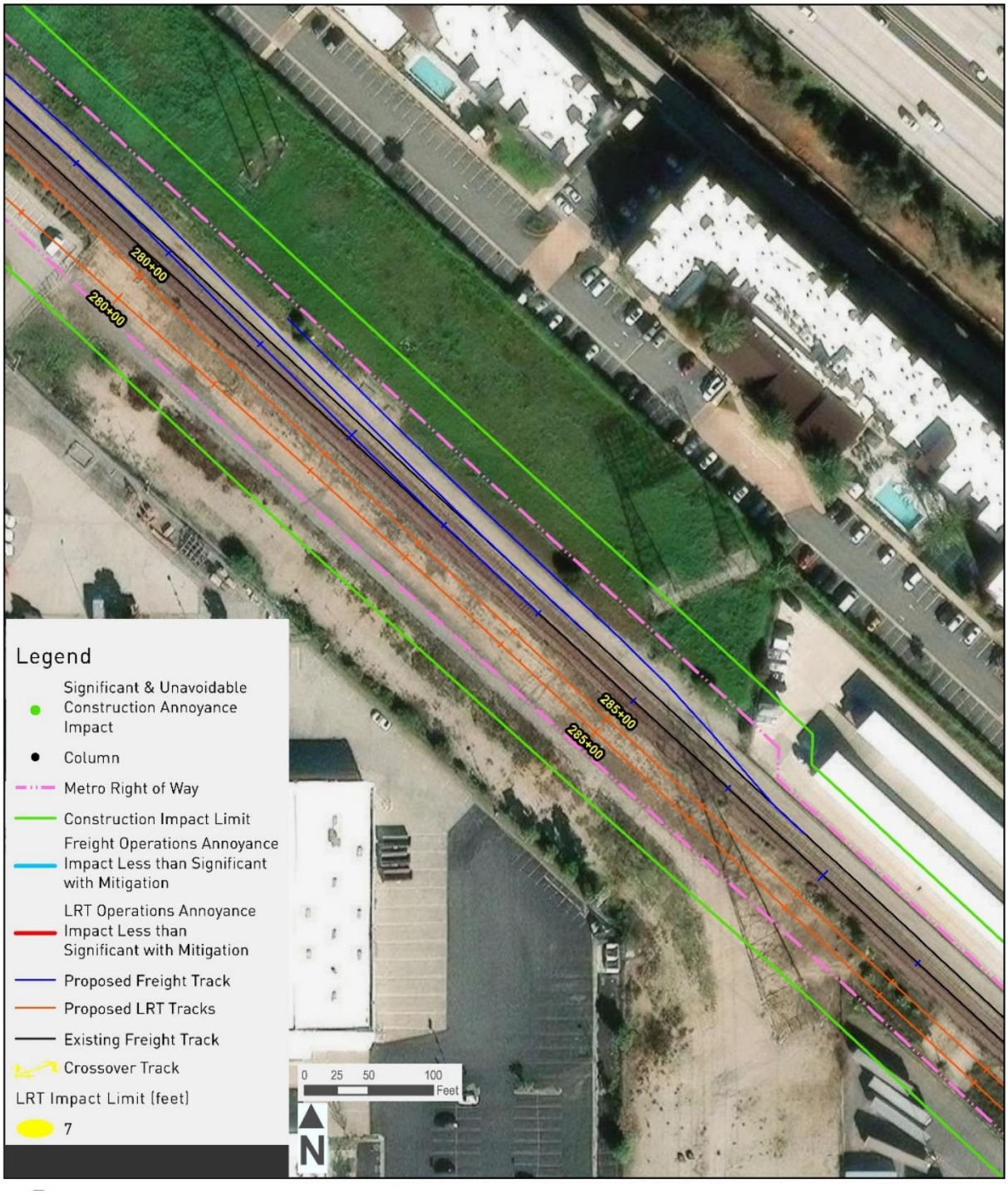
[1] All operational vibration impacts would be reduced to less than significant with mitigation with MM-VIB-5 and MM-VIB-6

Figure 4-10. LPA Construction & Operation Vibration Impacts 1 of 33



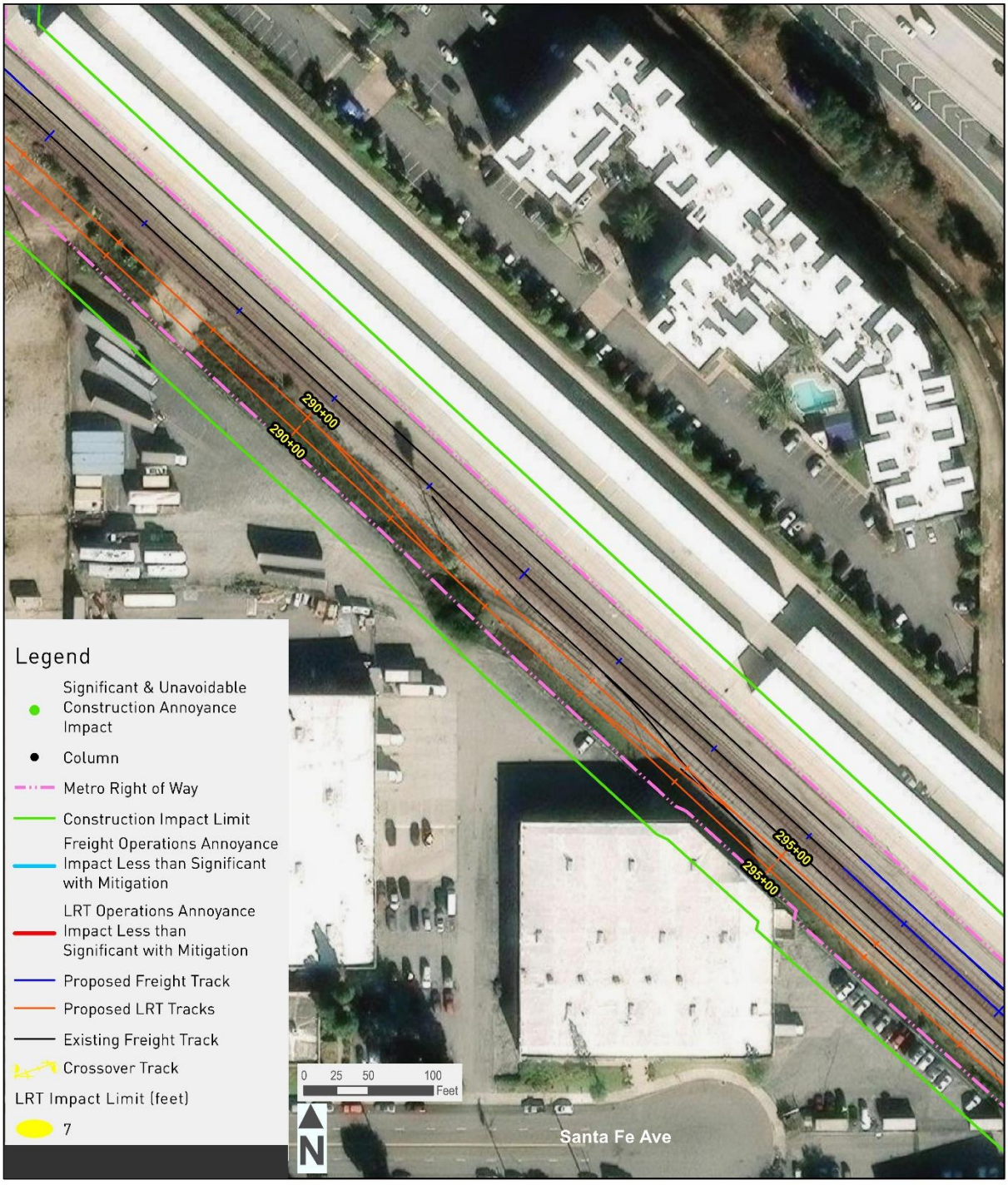
Source: AECOM, 2025
Note: The LPA would not result in vibration damage impacts after mitigation.

Figure 4-11. LPA Construction & Operation Vibration Impacts 2 of 33



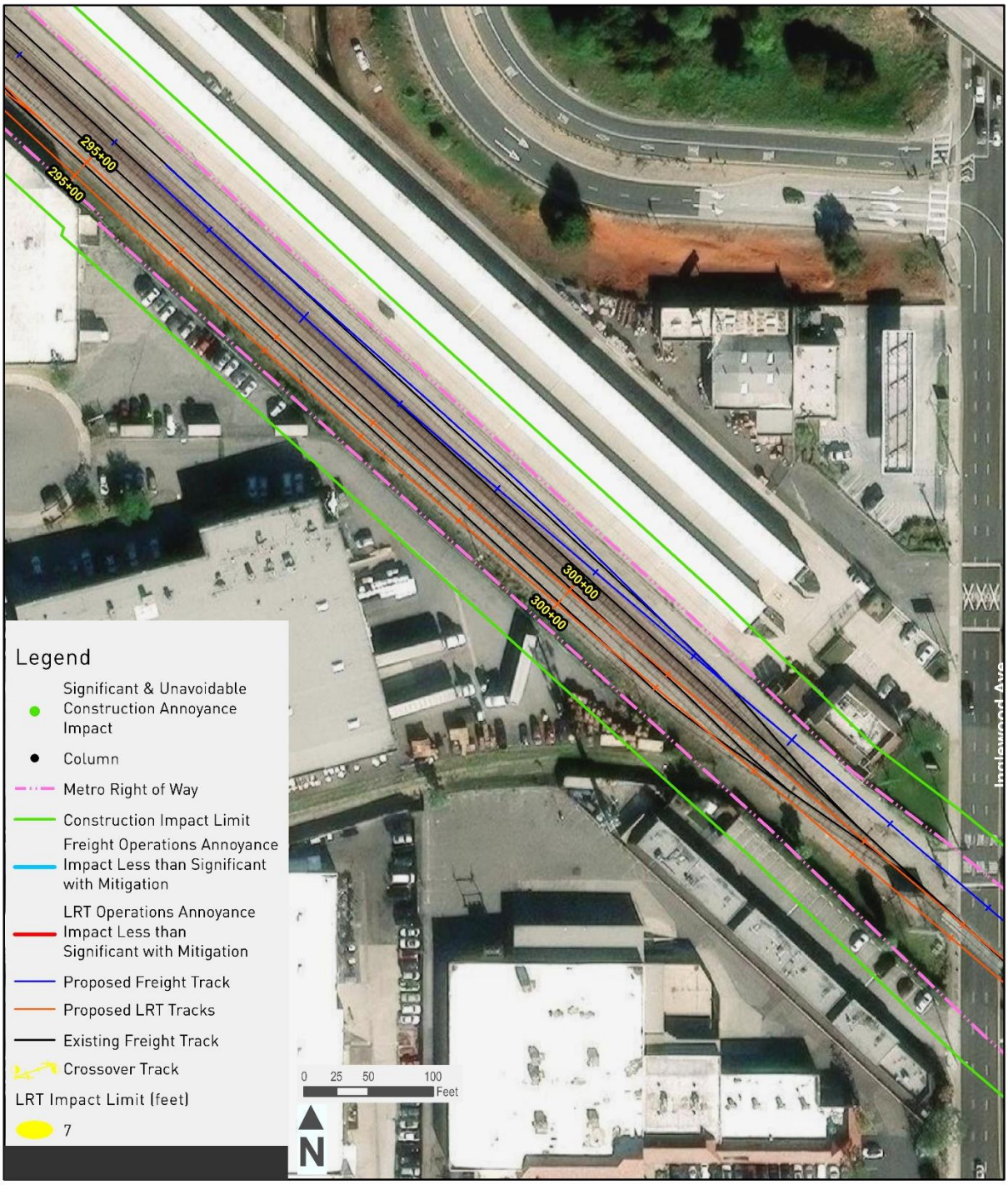
Source: AECOM, 2025
Note: The LPA would not result in vibration damage impacts after mitigation.

Figure 4-12. LPA Construction & Operation Vibration Impacts 3 of 33



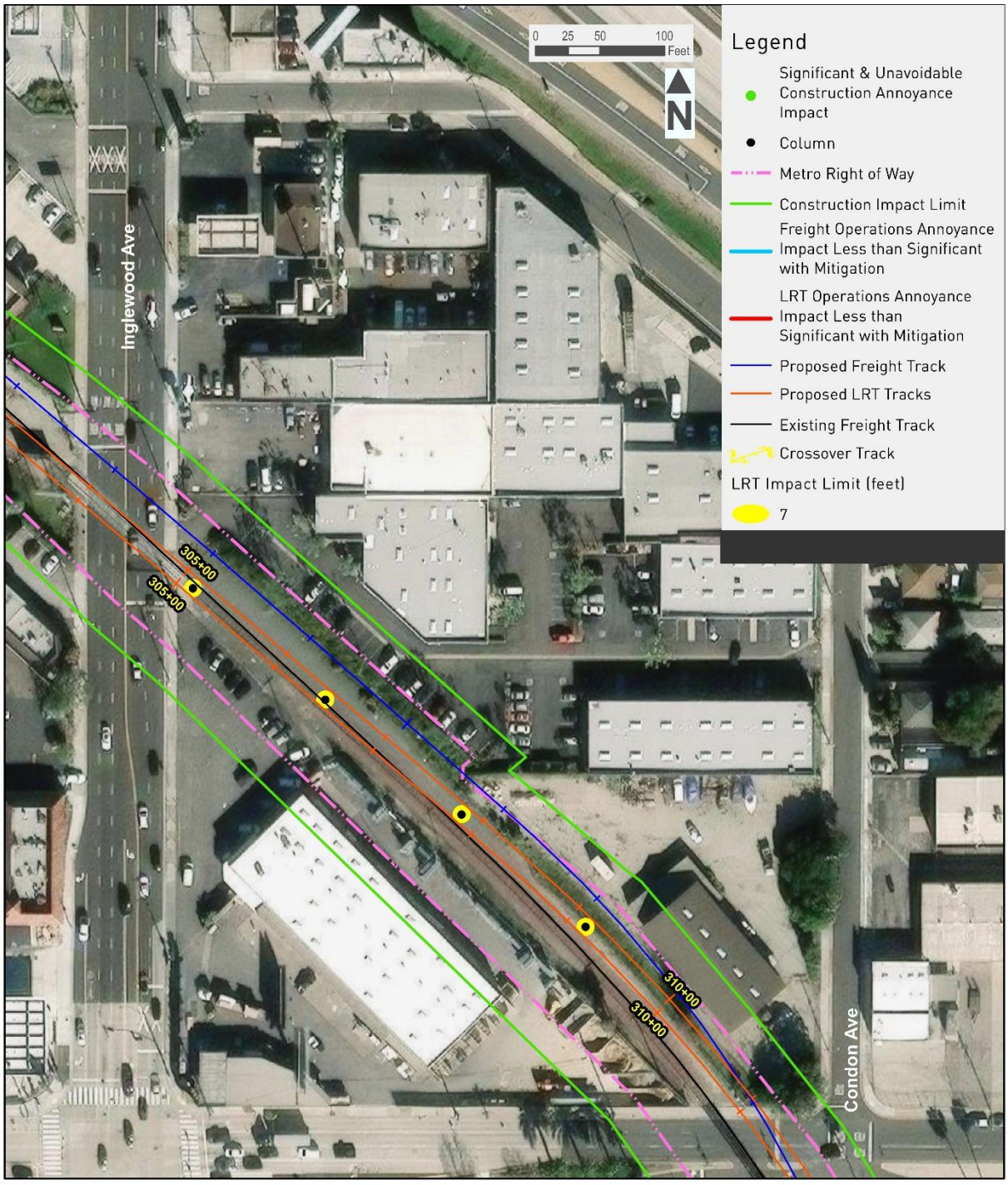
Source: AECOM, 2025
Note: The LPA would not result in vibration damage impacts after mitigation.

Figure 4-13. LPA Construction & Operation Vibration Impacts 4 of 33



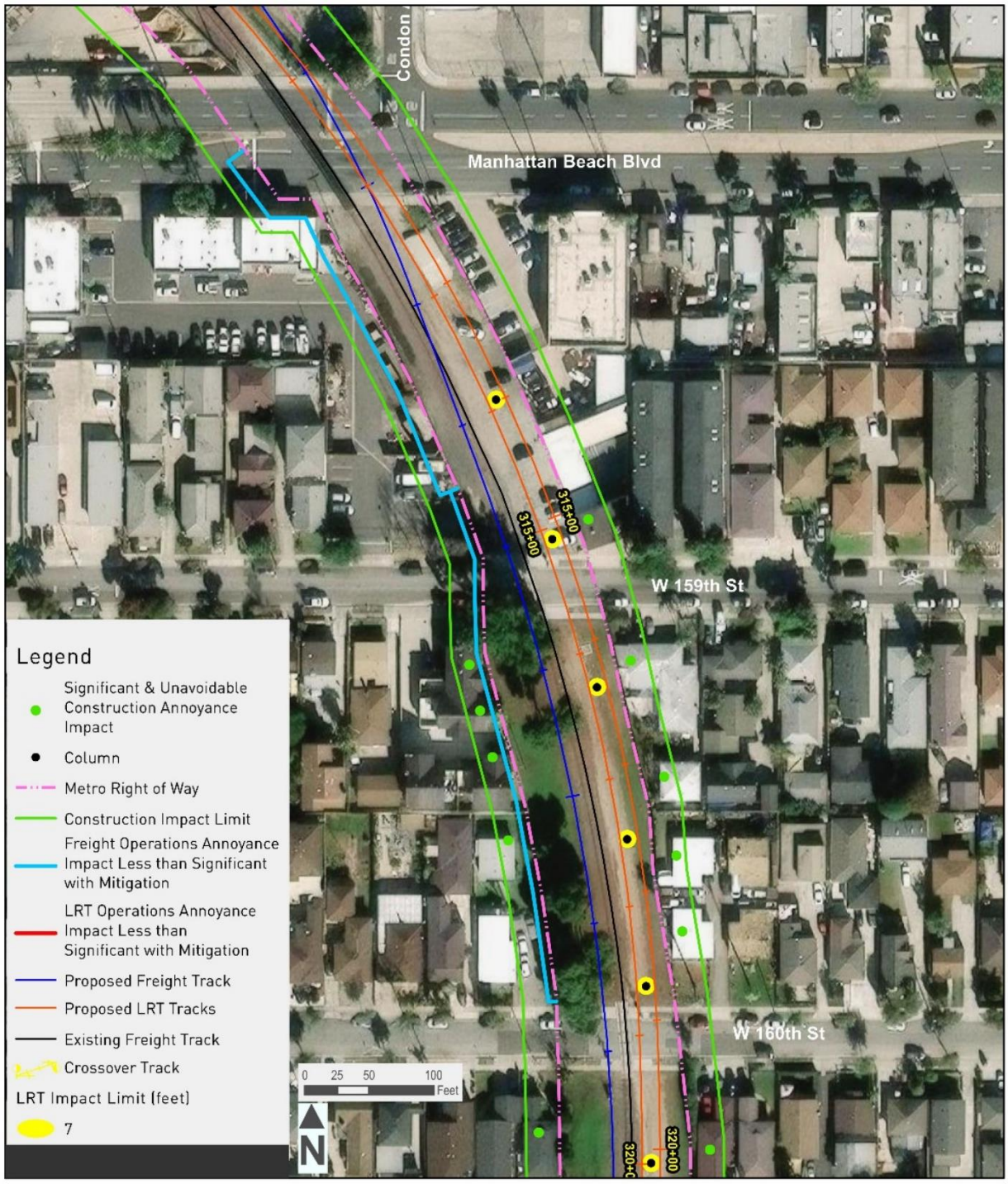
Source: AECOM, 2025
Note: The LPA would not result in vibration damage impacts after mitigation.

Figure 4-14. LPA Construction & Operation Vibration Impacts 5 of 33



Source: AECOM, 2025
Note: The LPA would not result in vibration damage impacts after mitigation.

Figure 4-15. LPA Construction & Operation Vibration Impacts 6 of 33



Source: AECOM, 2025
Note: The LPA would not result in vibration damage impacts after mitigation.

Figure 4-16. LPA Construction & Operation Vibration Impacts 7 of 33



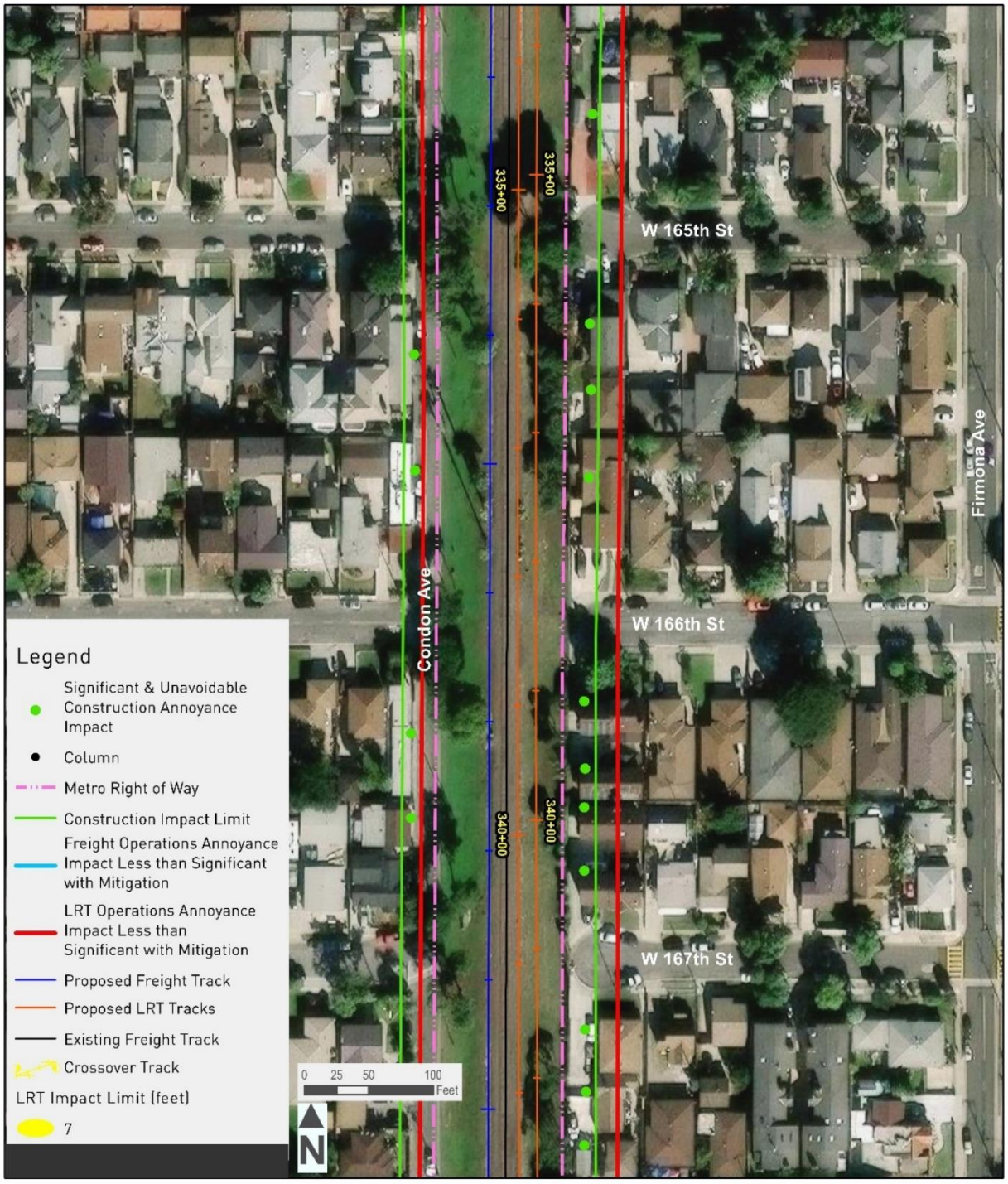
Source: AECOM, 2025
Note: The LPA would not result in vibration damage impacts after mitigation.

Figure 4-17. LPA Construction & Operation Vibration Impacts 8 of 33



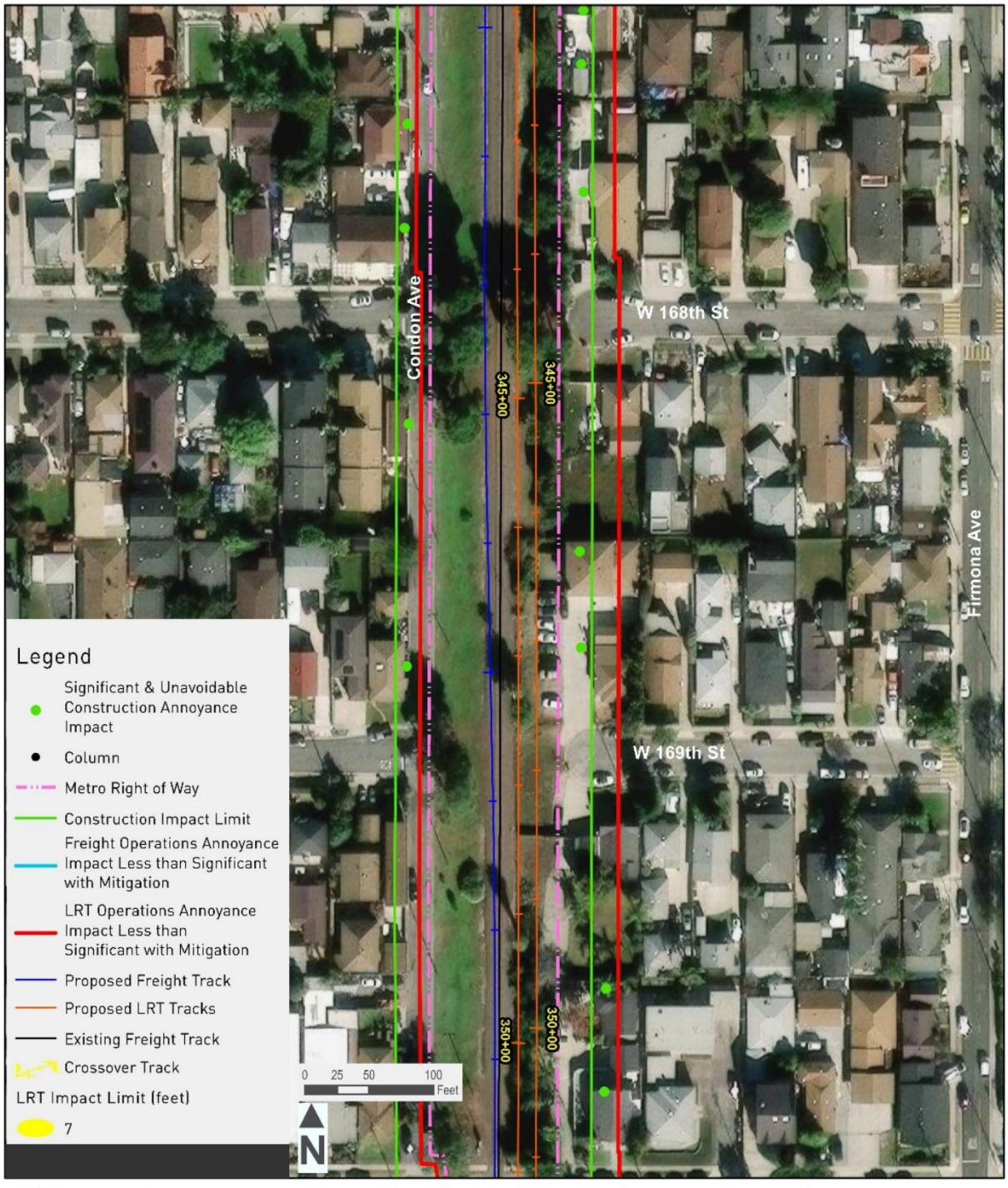
Source: AECOM, 2025
Note: The LPA would not result in vibration damage impacts after mitigation.

Figure 4-18. LPA Construction & Operation Vibration Impacts 9 of 33



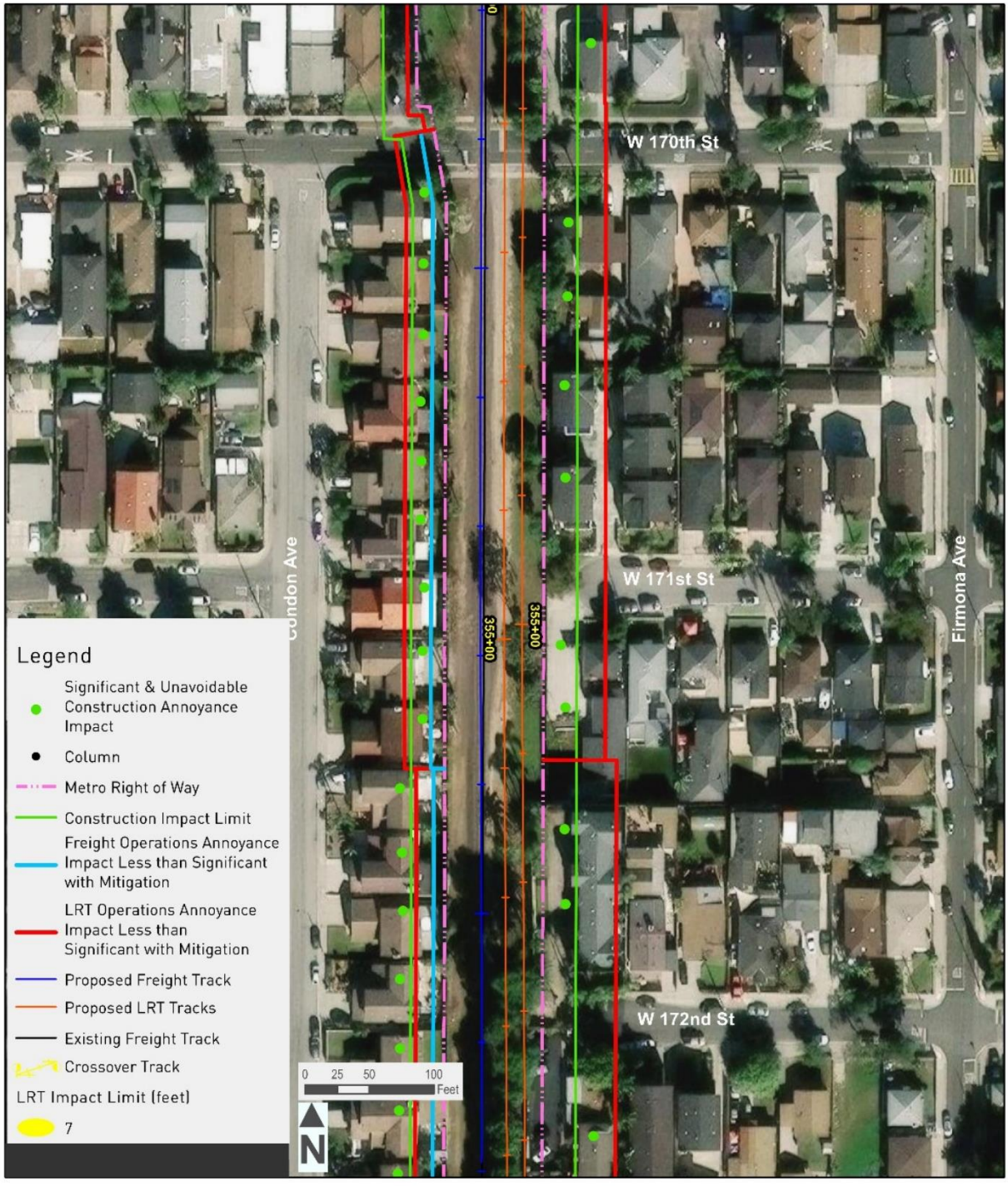
Source: AECOM, 2025
Note: The LPA would not result in vibration damage impacts after mitigation.

Figure 4-19. LPA Construction & Operation Vibration Impacts 10 of 33



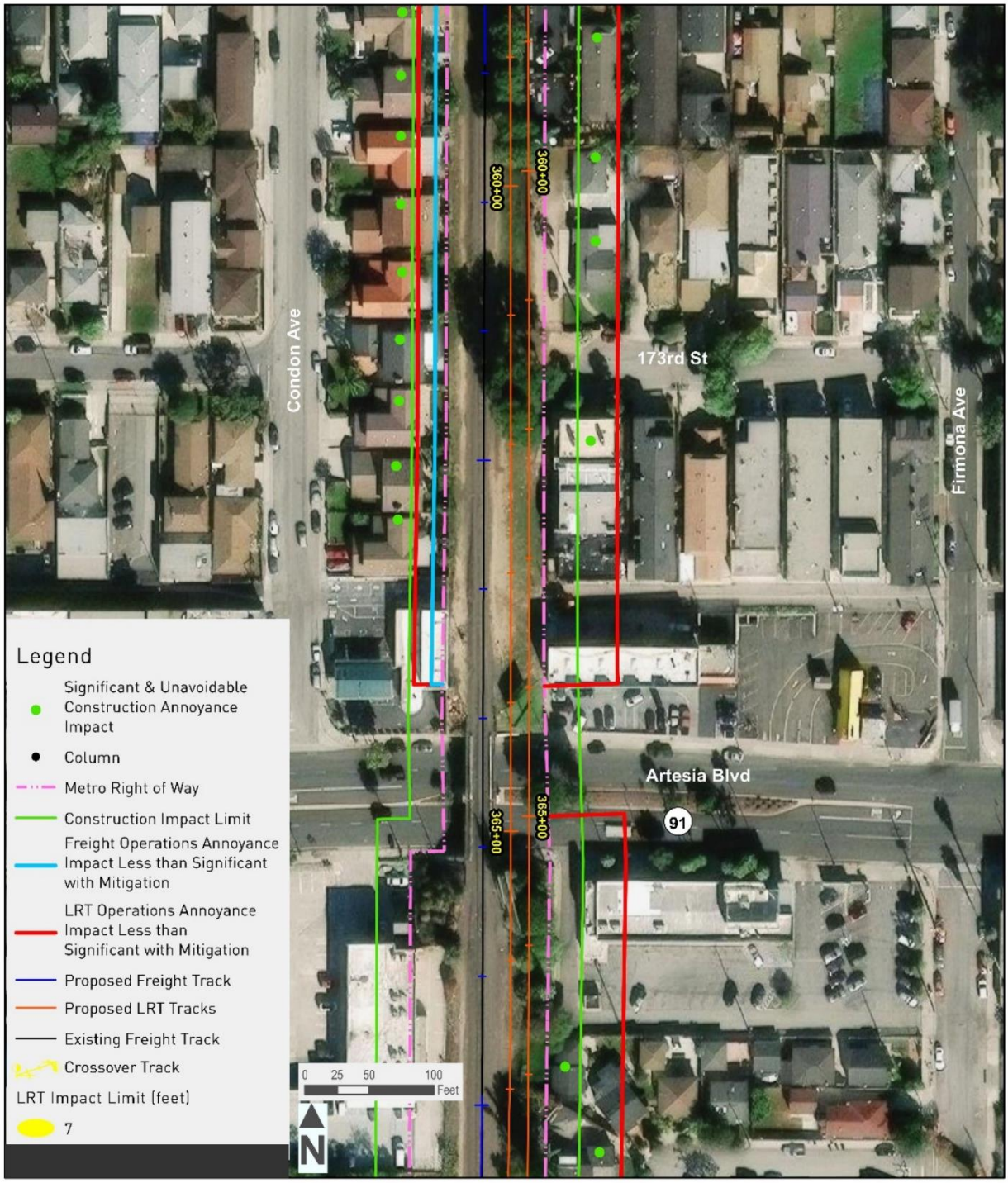
Source: AECOM, 2025
Note: The LPA would not result in vibration damage impacts after mitigation.

Figure 4-20. LPA Construction & Operation Vibration Impacts 11 of 33



Source: AECOM, 2025
Note: The LPA would not result in vibration damage impacts after mitigation.

Figure 4-21. LPA Construction & Operation Vibration Impacts 12 of 33



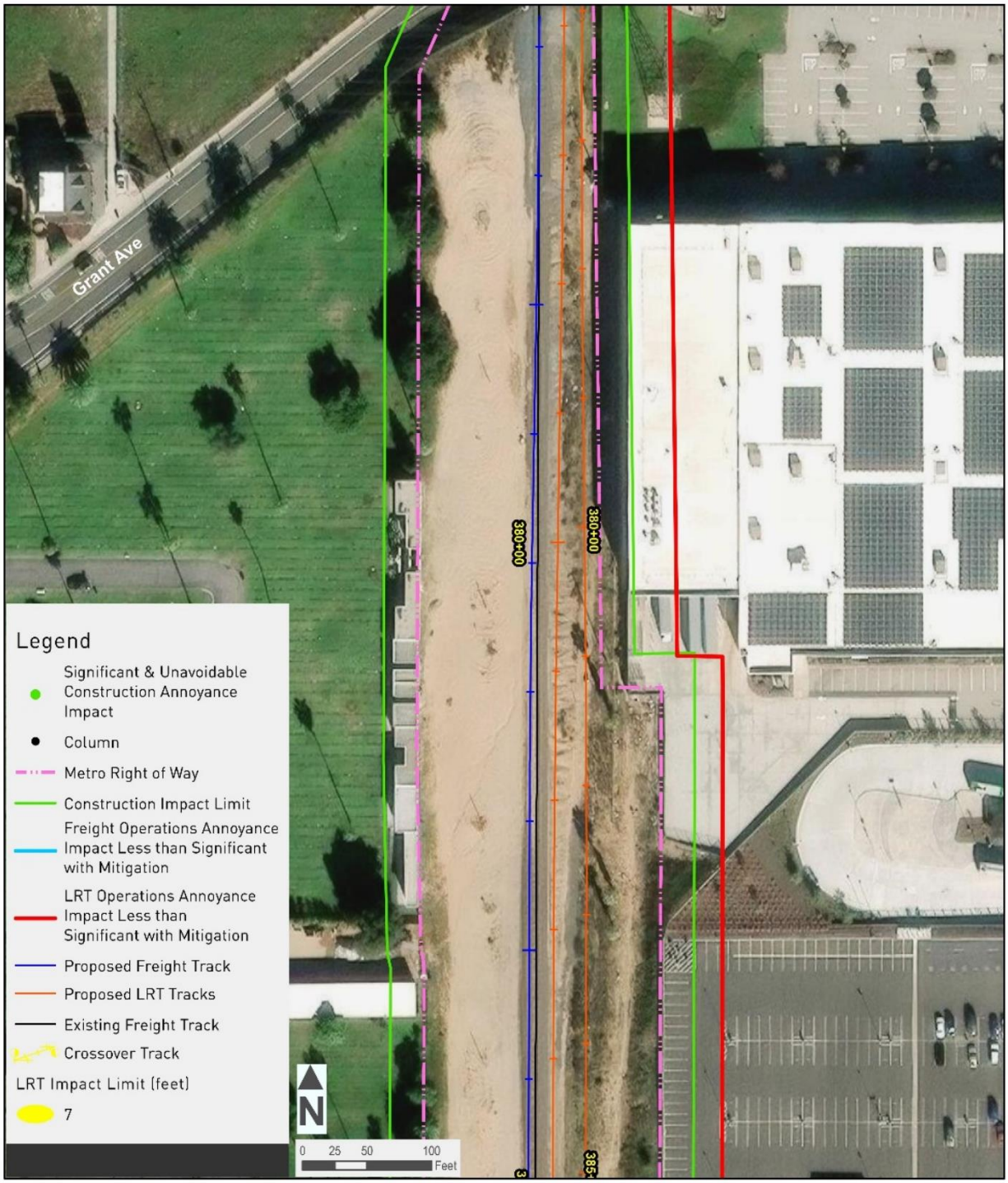
Source: AECOM, 2025
Note: The LPA would not result in vibration damage impacts after mitigation.

Figure 4-22. LPA Construction & Operation Vibration Impacts 13 of 33



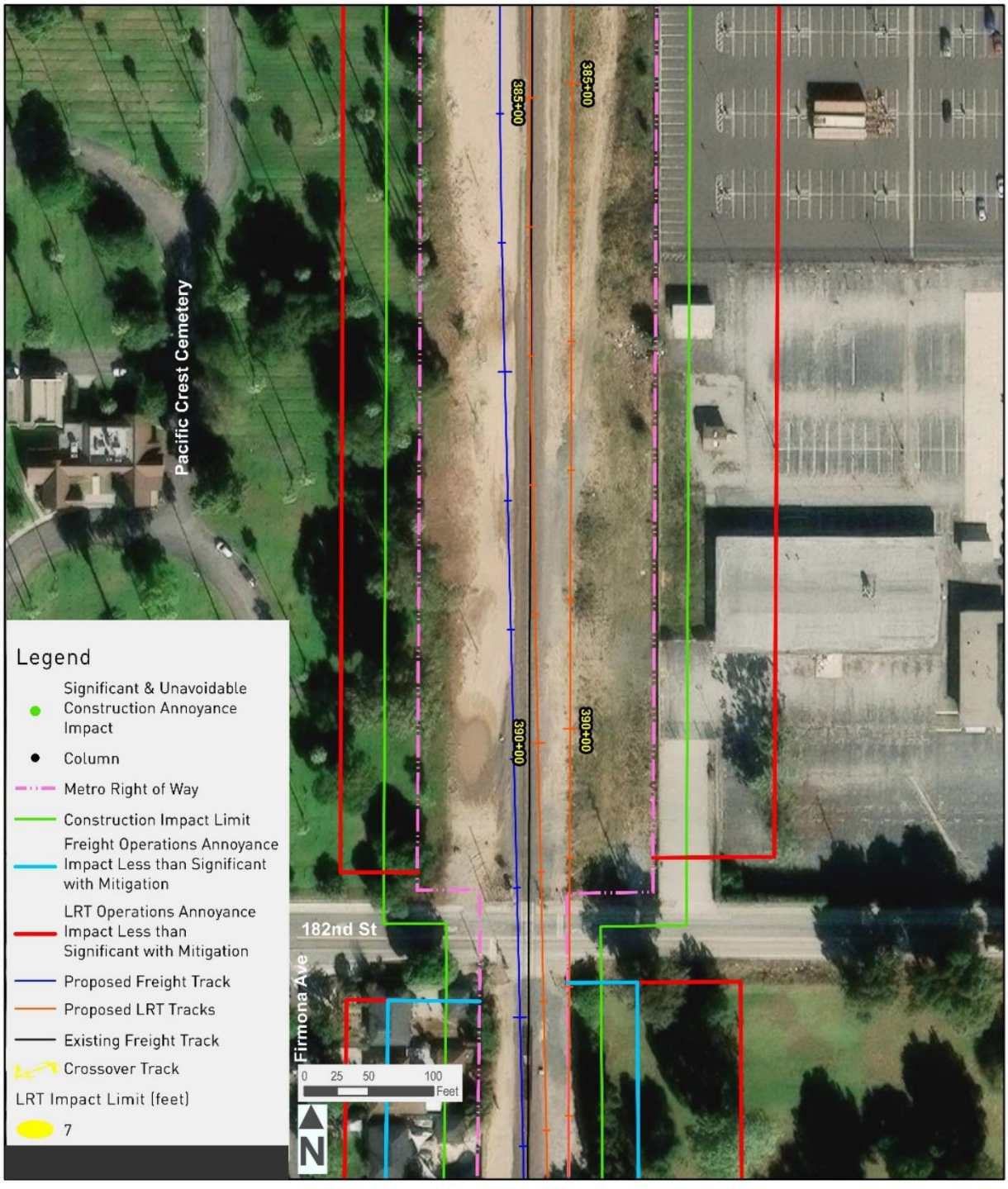
Source: AECOM, 2025
Note: The LPA would not result in vibration damage impacts after mitigation.

Figure 4-23. LPA Construction & Operation Vibration Impacts 14 of 33



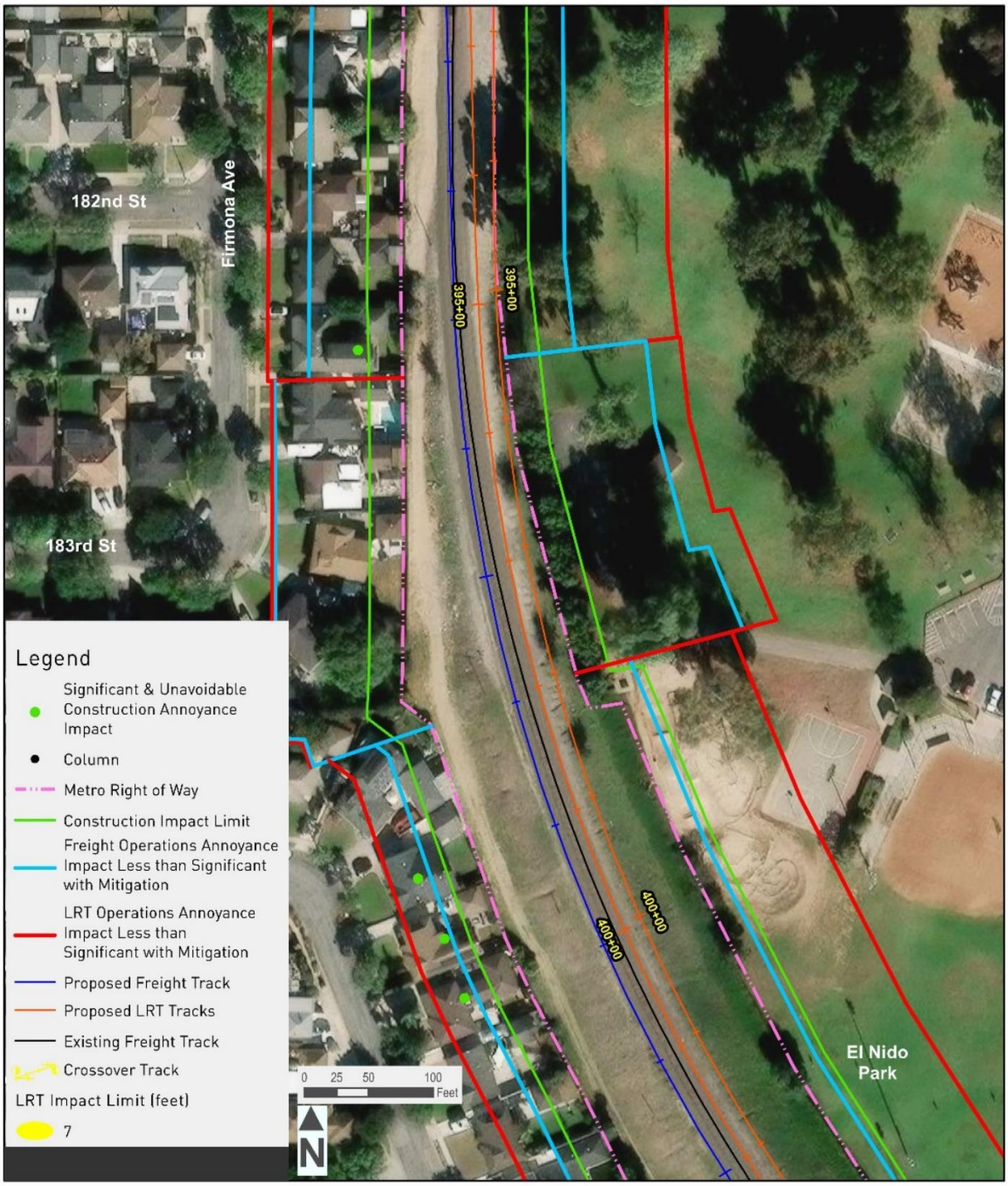
Source: AECOM, 2025
Note: The LPA would not result in vibration damage impacts after mitigation.

Figure 4-24. LPA Construction & Operation Vibration Impacts 15 of 33



Source: AECOM, 2025
Note: The LPA would not result in vibration damage impacts after mitigation.

Figure 4-25. LPA Construction & Operation Vibration Impacts 16 of 33



Source: AECOM, 2025
Note: The LPA would not result in vibration damage impacts after mitigation.

Figure 4-26. LPA Construction & Operation Vibration Impacts 17 of 33



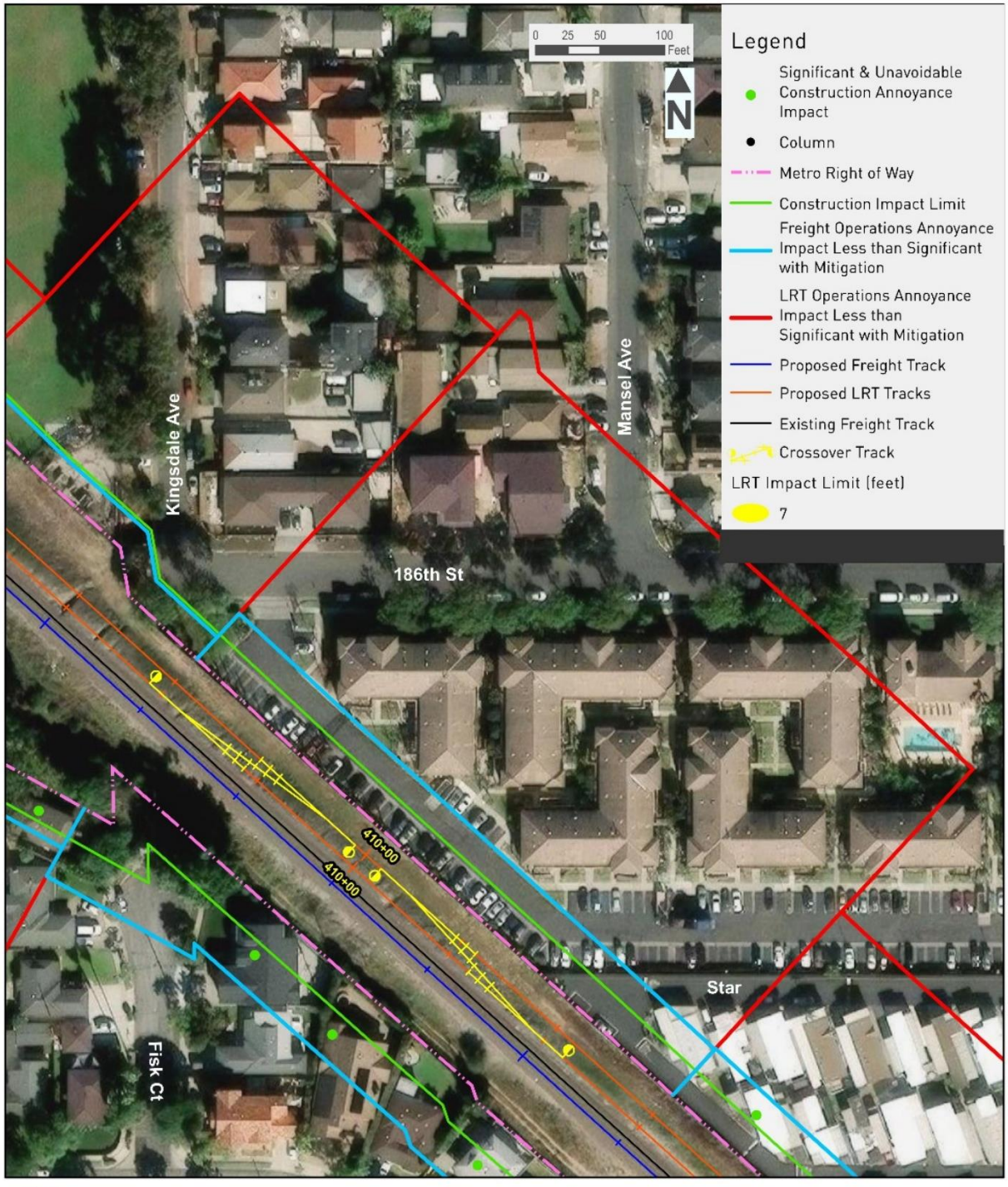
Source: AECOM, 2025
Note: The LPA would not result in vibration damage impacts after mitigation.

Figure 4-27. LPA Construction & Operation Vibration Impacts 18 of 33



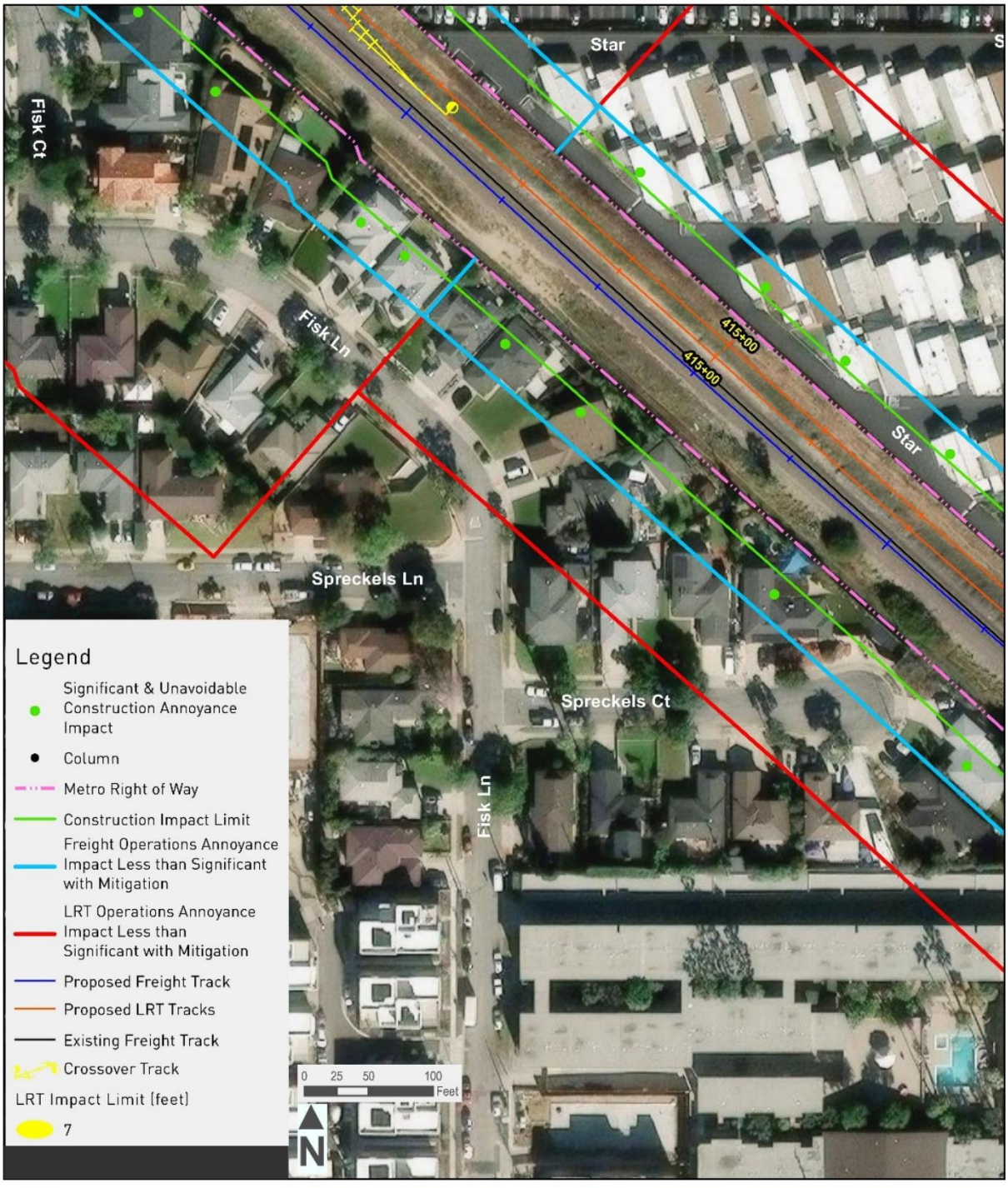
Source: AECOM, 2025
Note: The LPA would not result in vibration damage impacts after mitigation.

Figure 4-28. LPA Construction & Operation Vibration Impacts 19 of 33



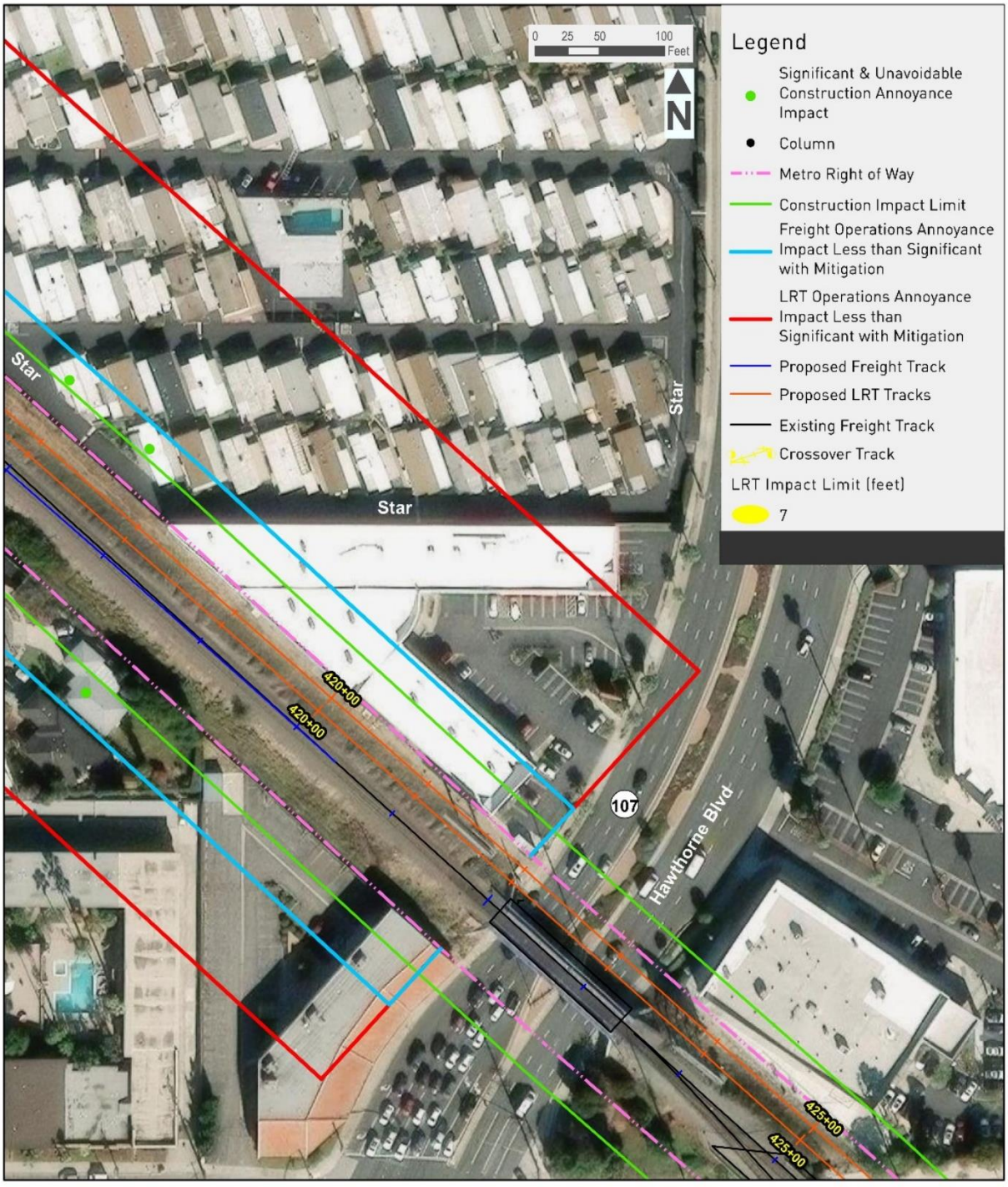
Source: AECOM, 2025
Note: The LPA would not result in vibration damage impacts after mitigation.

Figure 4-29. LPA Construction & Operation Vibration Impacts 20 of 33



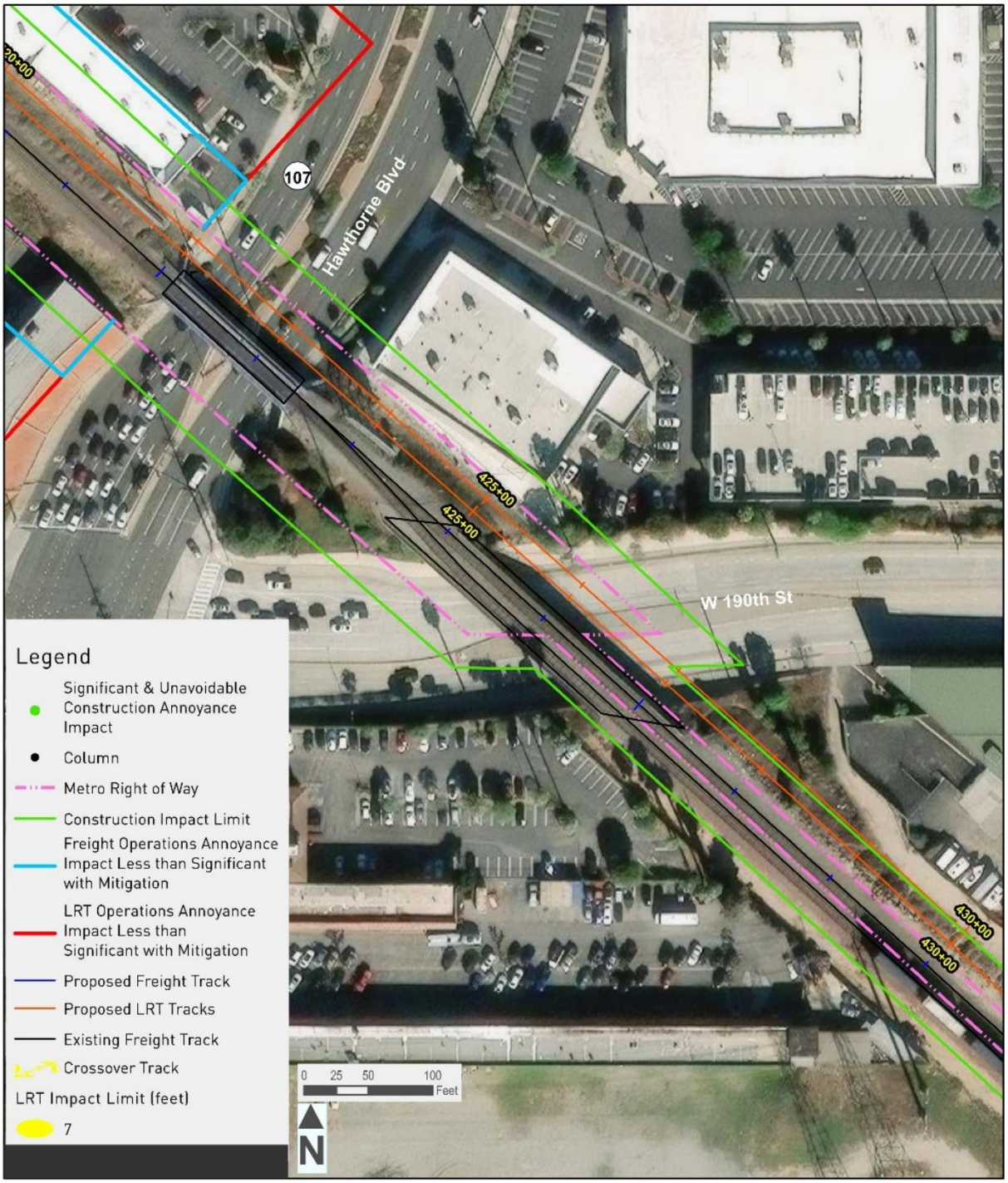
Source: AECOM, 2025
Note: The LPA would not result in vibration damage impacts after mitigation.

Figure 4-30. LPA Construction & Operation Vibration Impacts 21 of 33



Source: AECOM, 2025
Note: The LPA would not result in vibration damage impacts after mitigation.

Figure 4-31. LPA Construction & Operation Vibration Impacts 22 of 33



Source: AECOM, 2025
Note: The LPA would not result in vibration damage impacts after mitigation.

Figure 4-32. LPA Construction & Operation Vibration Impacts 23 of 33



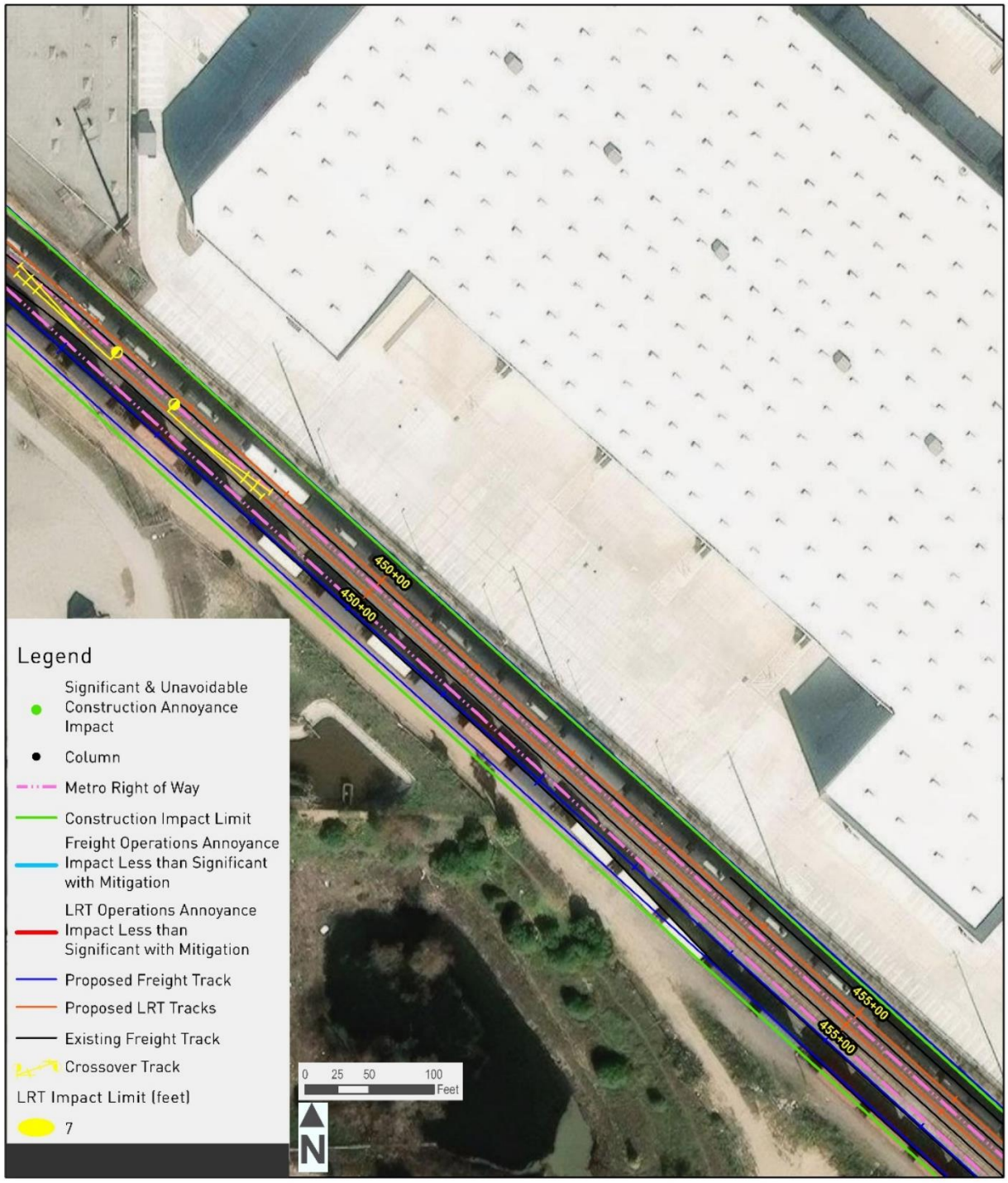
Source: AECOM, 2025
Note: The LPA would not result in vibration damage impacts after mitigation.

Figure 4-33. LPA Construction & Operation Vibration Impacts 24 of 33



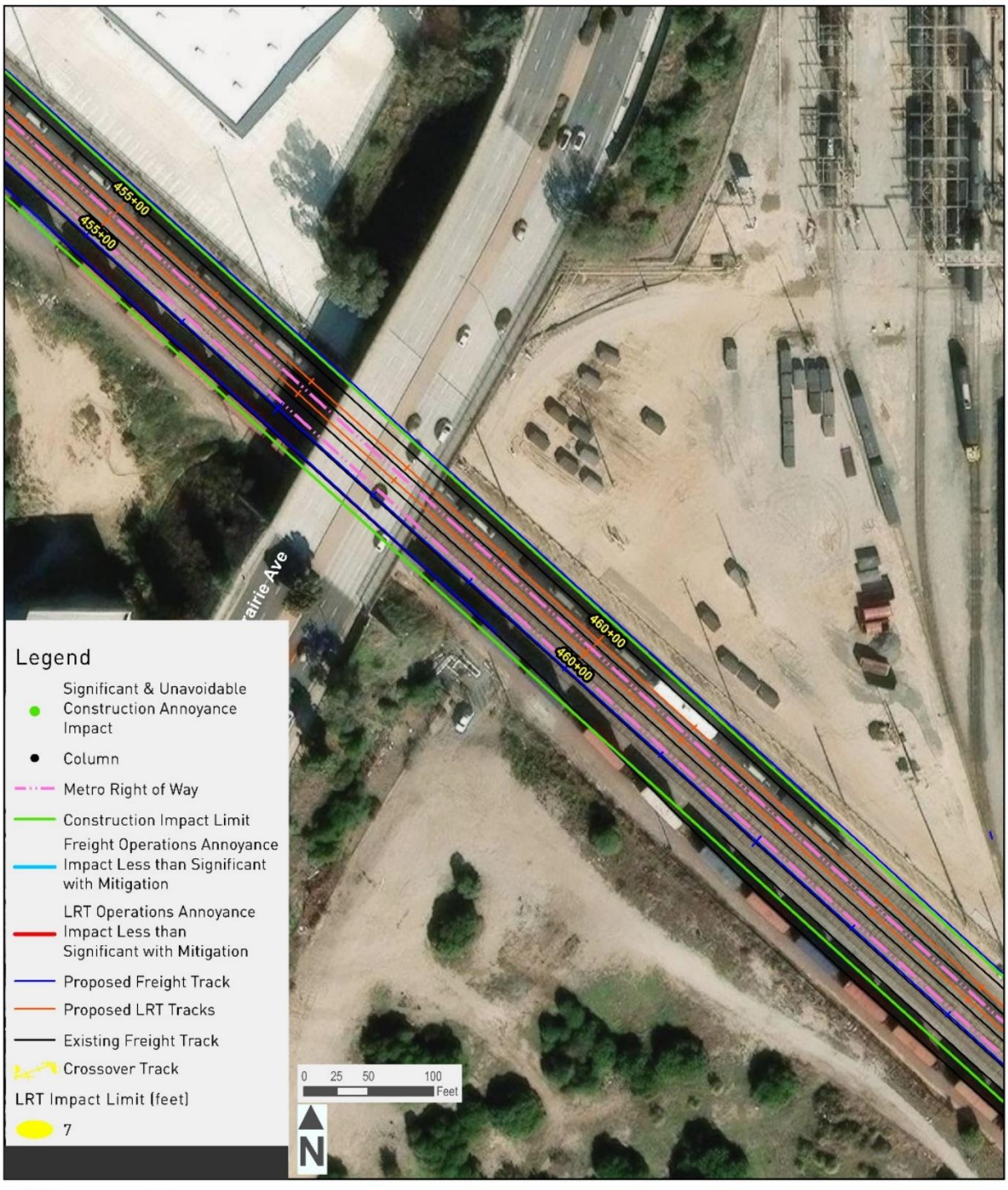
Source: AECOM, 2025
Note: The LPA would not result in vibration damage impacts after mitigation.

Figure 4-34. LPA Construction & Operation Vibration Impacts 25 of 33



Source: AECOM, 2025
Note: The LPA would not result in vibration damage impacts after mitigation.

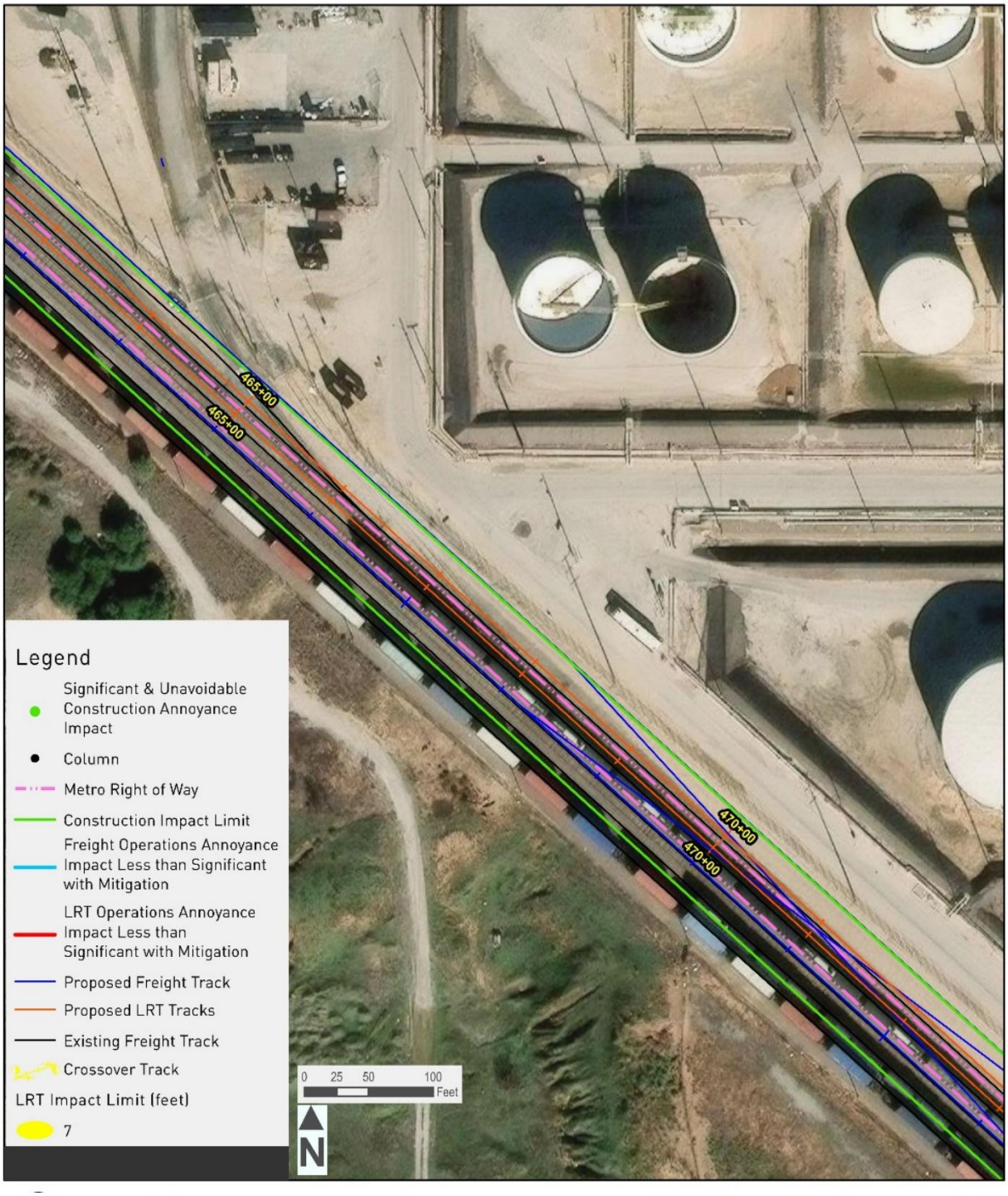
Figure 4-35. LPA Construction & Operation Vibration Impacts 26 of 33



Source: AECOM, 2025

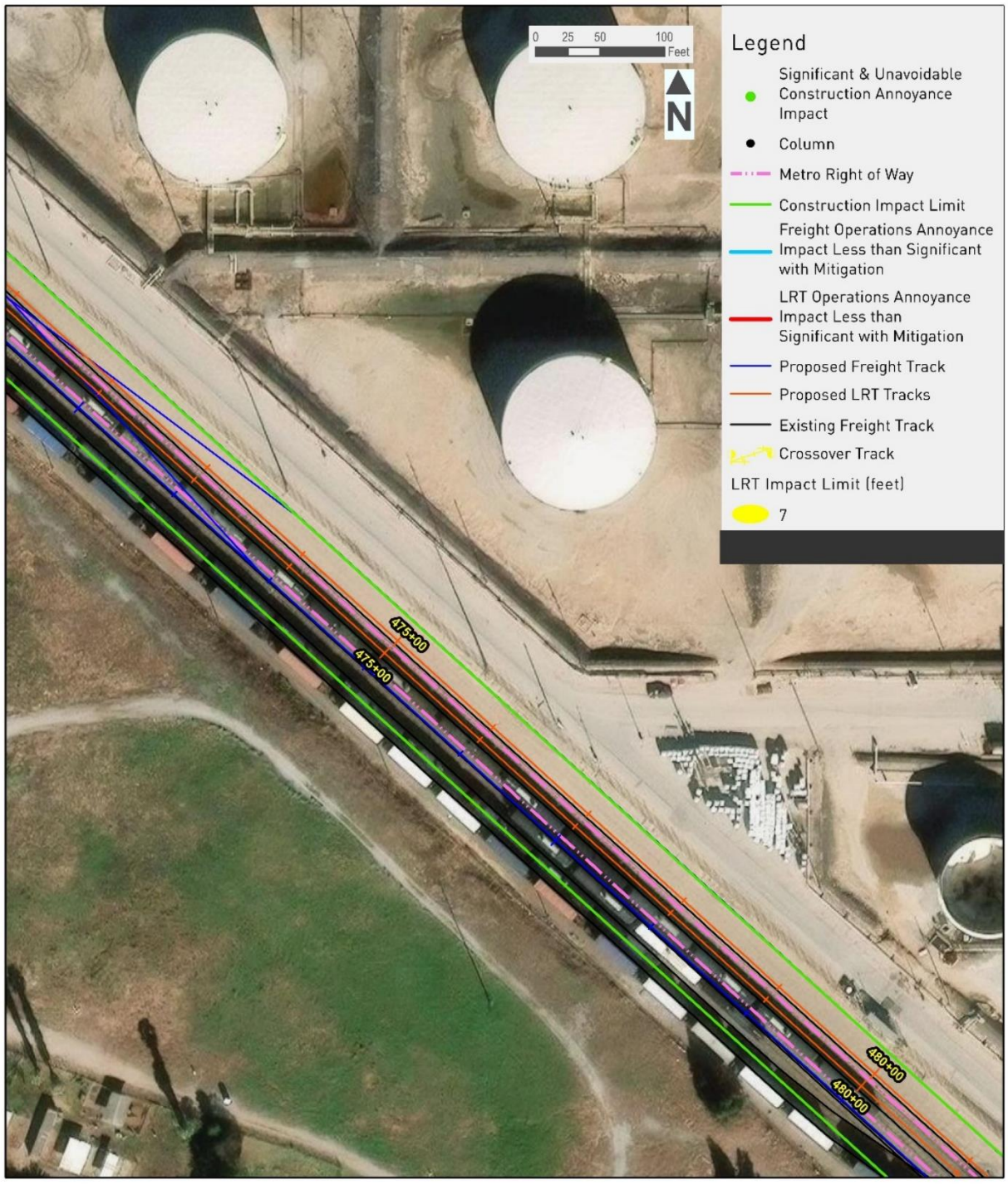
Note: The LPA would not result in vibration damage impacts after mitigation.

Figure 4-36. LPA Construction & Operation Vibration Impacts 27 of 33



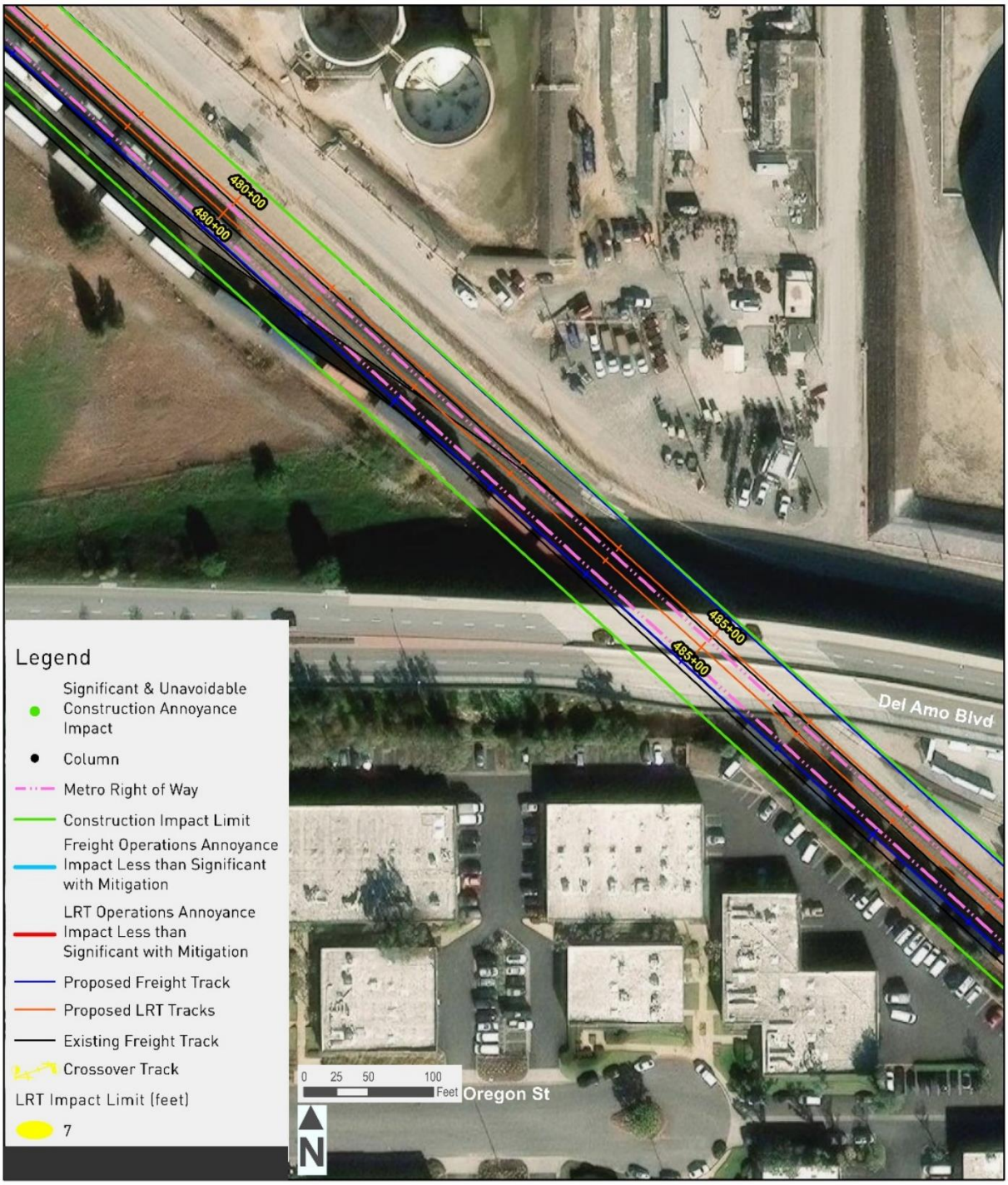
Source: AECOM, 2025
Note: The LPA would not result in vibration damage impacts after mitigation.

Figure 4-37. LPA Construction & Operation Vibration Impacts 28 of 33



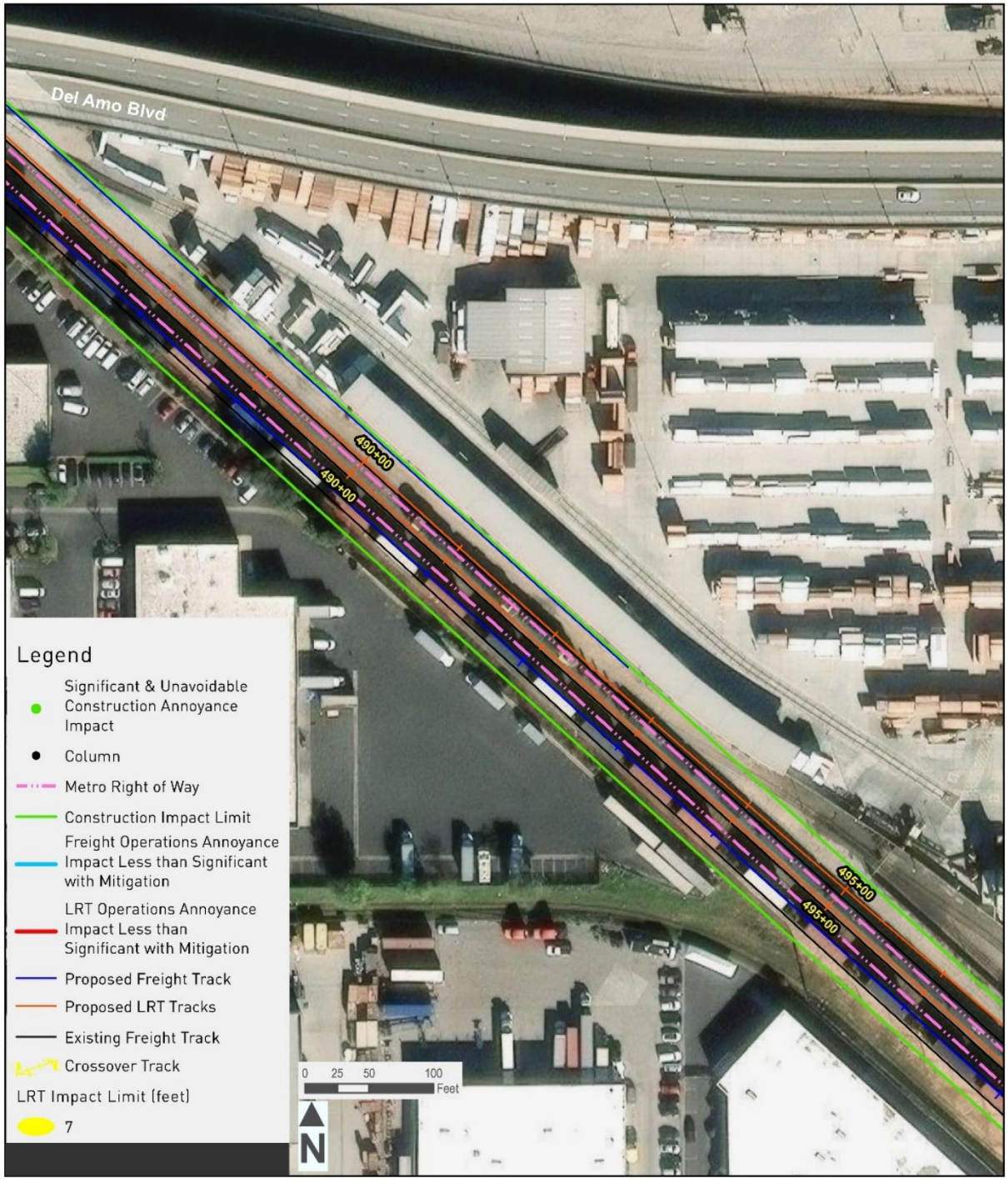
Source: AECOM, 2025
Note: The LPA would not result in vibration damage impacts after mitigation.

Figure 4-38. LPA Construction & Operation Vibration Impacts 29 of 33



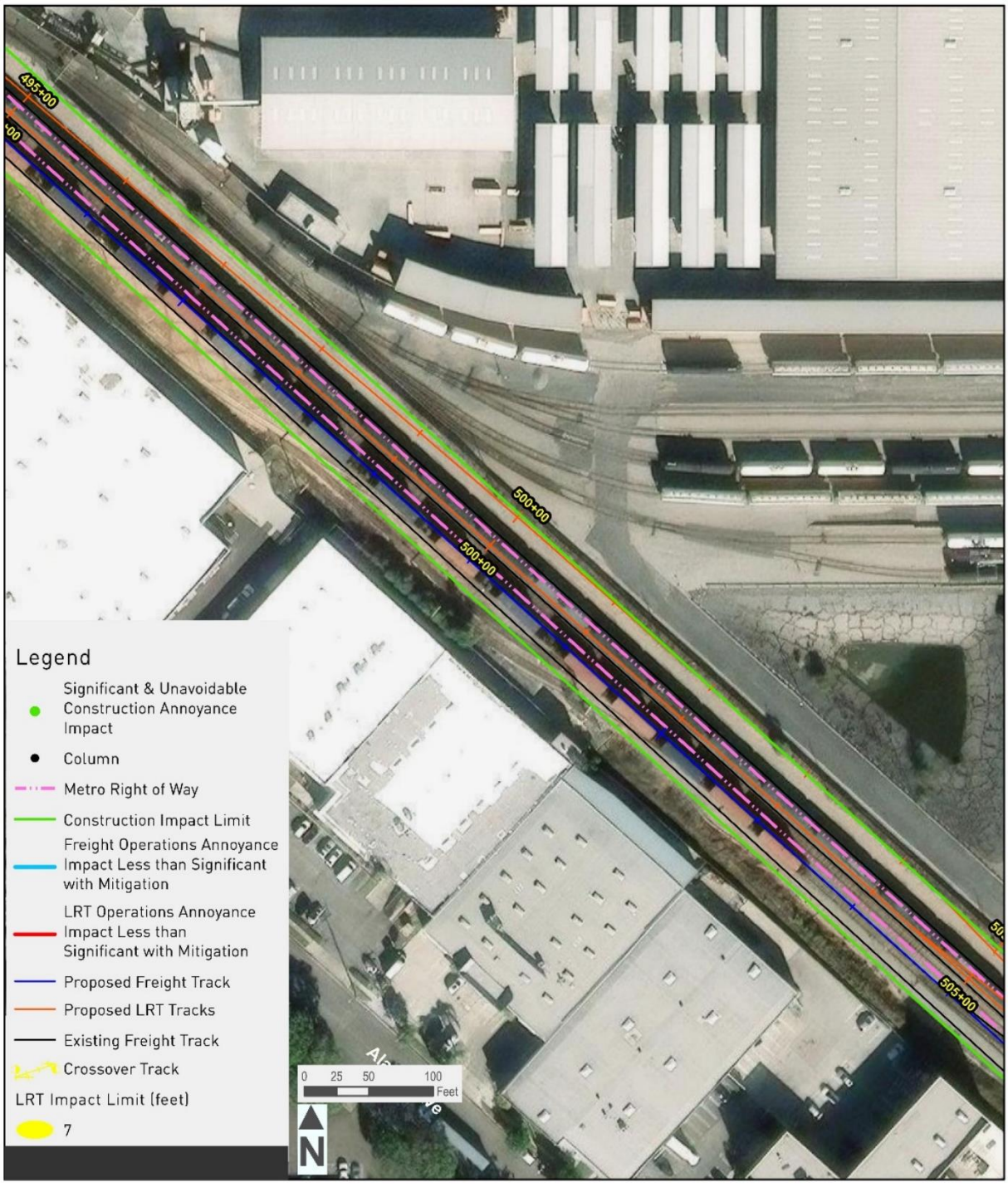
Source: AECOM, 2025
Note: The LPA would not result in vibration damage impacts after mitigation.

Figure 4-39. LPA Construction & Operation Vibration Impacts 30 of 33



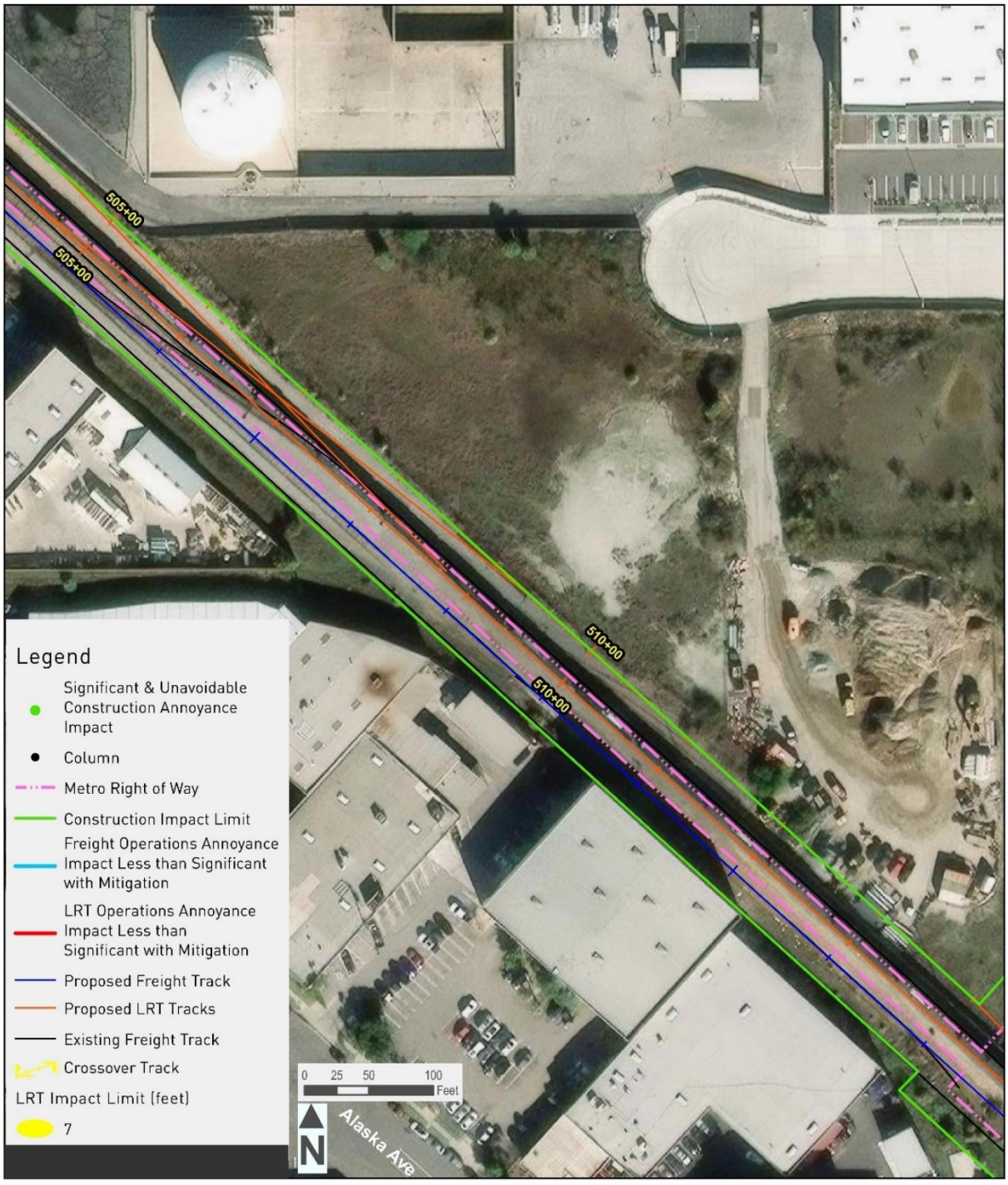
Source: AECOM, 2025
Note: The LPA would not result in vibration damage impacts after mitigation.

Figure 4-40. LPA Construction & Operation Vibration Impacts 31 of 33



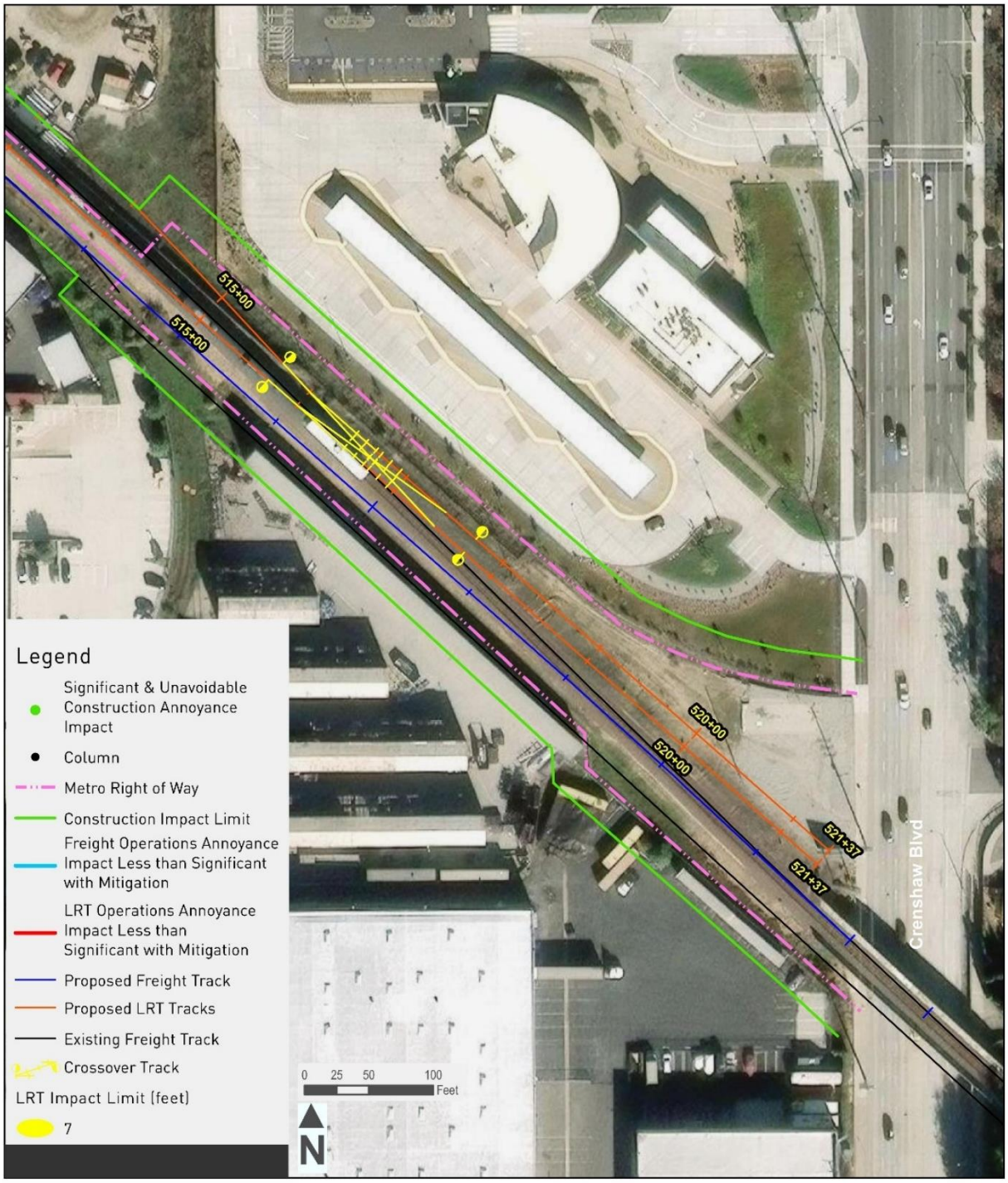
Source: AECOM, 2025
Note: The LPA would not result in vibration damage impacts after mitigation.

Figure 4-41. LPA Construction & Operation Vibration Impacts 32 of 33



Source: AECOM, 2025
Note: The LPA would not result in vibration damage impacts after mitigation.

Figure 4-42. LPA Construction & Operation Vibration Impacts 33 of 33



Source: AECOM, 2025
Note: The LPA would not result in vibration damage impacts after mitigation.

Page 4-46 – The following language was modified within the text under 4.5-3.12.1 (Energy – Construction) under the 170th/182nd Grade-Separated Light Rail Transit Alternative (LPA):

> **Less than Significant Impact.** Construction of the trench alignment under 170th and 182nd Streets would increase the construction duration~~, compared to~~ *and the number of haul truck trips relative to* the Proposed Project, ~~and~~ *which would require* more fuel ~~would be used~~ for construction vehicles and equipment~~, but this difference would not result in a notable difference in impacts to energy~~. *However, the increase in fuel consumption would not represent a significant difference and would be less than the fuel consumption disclosed for the Trench Option. Furthermore, the energy expenditure associated with construction fuel consumption would eventually be offset by the energy savings of replacing and shortening on-road passenger vehicle trips with use of light rail.* The*refore, the* 170th/182nd Grade-Separated Light Rail Transit Alternative would have a **less than significant impact** during construction related to energy.

Page 4-49 – The table number is revised and definition of acronyms used in the Table 4.5-1. Comparison of Alternatives' Environmental Impacts to the Proposed Project is added as follows:

Table 4.5-~~2~~3. Comparison of Alternatives' Environmental Impacts to the Proposed Project

Topics		Proposed Project	Trench Option	Hawthorne Option	No Project Alternative	HFB Alternative	170th/182nd Grade-Separated Alternative
Transportation	Construction	LTS	LTS	LTS	LTS	LTS	LTS
	Operation	LTS	LTS	LTS	SUI	LTS	LTS
Land Use and Planning	Construction	LTS	LTS	LTSM	LTS	LTS	LTS
	Operation	LTS	LTS	LTS	SUI	LTS	LTS
Aesthetics	Construction	LTSM	LTSM	LTSM	LTS	LTS	LTSM
	Operation	LTS	LTS	LTS	LTS	LTS	LTS
Air Quality	Construction	LTS	SUI	LTS	LTS	LTS	LTS
	Operation	LTS	LTS	LTS	SUI	LTS	LTS
Greenhouse Gas Emissions	Construction	LTS	LTS	LTS	LTS	LTS	LTS
	Operation	LTS	LTS	LTS	SUI	LTS	LTS
Noise	Construction	SUI	SUI	SUI	LTS	LTS	SUI
	Operation	SUI	SUI/LTSM[1]	LTSM	LTS	LTS	SUI/LTSM[1]
Vibration	Construction	SUI	SUI	SUI	LTS	LTS	SUI
	Operation	LTSM	LTSM	LTSM	LTS	LTS	LTSM
Biological Resources	Construction	LTSM	LTSM	LTSM	LTS	LTS	LTSM
	Operation	LTSM	LTSM	LTSM	LTS	LTS	LTSM
Geology, Soils, and Paleontological Resources	Construction	LTSM	LTSM	LTSM	LTS	LTS	LTSM
	Operation	LTS	LTS	LTS	LTS	LTS	LTS
Hazards and Hazardous Materials	Construction	LTS	LTS	LTS	LTS	LTS	LTS
	Operation	LTS	LTS	LTS	LTS	LTS	LTS
Hydrology and Water Quality	Construction	LTS	LTS	LTS	LTS	LTS	LTS
	Operation	LTS	LTS	LTS	LTS	LTS	LTS
Utilities and Service Systems	Construction	LTS	LTS	LTS	LTS	LTS	LTS
	Operation	LTS	LTS	LTS	LTS	LTS	LTS

Topics		Proposed Project	Trench Option	Hawthorne Option	No Project Alternative	HFB Alternative	170th/182nd Grade-Separated Alternative
Energy	Construction	LTS	LTS	LTS	LTS	LTS	LTS
	Operation	LTS	LTS	LTS	SUI	LTS	LTS
Cultural Resources	Construction	LTSM	LTSM	LTSM	LTS	LTS	LTSM
	Operation	LTS	LTS	LTS	LTS	LTS	LTS
Tribal Cultural Resources	Construction	LTSM	LTSM	LTSM	LTS	LTS	LTSM
	Operation	LTS	LTS	LTS	LTS	LTS	LTS
Public Services	Construction	LTS	LTS	LTS	LTS	LTS	LTS
	Operation	LTS	LTS	LTS	LTS	LTS	LTS

[1] With establishment of quiet zones by the Cities of Lawndale, Redondo Beach, and Torrance (Mitigation Measure MM-NOI-4), the Trench Option and 170th /182nd Street Grade-Separated Alternative would have a less than significant impact with mitigation for operational noise.

LTS = Less than Significant; LTSM = Less than Significant with Mitigation; SUI = Significant and Unavoidable Impact

4.22 CHAPTER 5.0 – REFERENCES

Page 5-21 – The following reference is revised as follows:

Los Angeles County ~~Sewer~~ *Sanitation* Districts (LACSD). (2022). "Facilities – Joint Water Pollution Control Plant." https://www.lacsd.org/facilities/?tab=2&number=1

4.23 APPENDIX 2-A – SELECT ACE DRAWINGS

The eastern property line of the Metro ROW is misplaced in the following pages, showing the width as 80 to 81 feet when the actual width is 75 feet: pages 47, 60, 61, 84, and 85. Appendix B of the Final EIR reflects the corrected width of 75 feet.

4.24 APPENDIX 2-C – PROJECT FEATURES

Page 5 – Project Feature PF-AES-2 is revised as follows:

PF-AES-2. Metro Design Standards

All project components, including, but not limited to track guideway, auxiliary facilities, *and station* (public and ancillary) facilities, ~~and the parking facility~~, will be designed per the MRDC and consistent with the objectives of the Metro Art Program Policy, Metro's Transit Service Policies & Standards, Systemwide Station Design Standards Policy, and Standard/Directive Drawings, or equivalent. Landscaping and operational lighting will also be installed consistent with these design standards.

Page 7 – The following section is added:

2.5 Biological Resources Project Features

PF-BIO-1. Metro Tree Policy

Metro Tree Policy outlines Metro's commitment to protecting trees, when possible, or replacing trees removed as a result of Metro construction and maintenance. For non-heritage trees, the replacement ratio defined was two trees for every tree removed. This policy also prioritizes planting strategies that maximizes the use of native species.

Page 7 – Project Feature PF-GEO-1 is revised to include the following first paragraph:

PF-GEO-1. Metro Geotechnical Design Standards

Prior to construction, Metro will complete soil investigations, including examination of any potential sinkholes by the geotechnical engineer of record, to inform site-specific design and construction measures.

Page 9 – Project Feature PF-HHM-1 is revised as follows:

PF-HHM-1. Handling, Storage, and Transport of Hazardous Materials and Wastes

Prior to the start of construction, the contractor would provide Metro with a hazardous waste and hazardous materials management plan, such as a plan defined in Title 19 California Code of Regulations (CCR), or a Spill Prevention, Control, and Countermeasure Plan. The plan will be completed to Metro contractor specifications and will comply with the State Water Resources Control Board (SWRCB) Construction Clean Water Act (CWA) Section 402 General Permit conditions and requirements for transport, labeling, containment, cover, and storage of hazardous materials during construction and operation. The plan will identify the responsible parties and outline procedures for hazardous waste and hazardous materials handling, storage,

and transport. The excavation and transport of soils contaminated by heavy metals (e.g., lead) would be managed according to SCAQMD Rule 1466 (Control of Particulate Emissions from Soils with Toxic Air Contaminants) and SCAQMD Rule 1166 (volatile organic compounds [VOC] emissions from Decontamination of Soil). The plan would also prescribe BMPs to follow to prevent hazardous material releases and for cleanup of any hazardous material releases that may occur. *The transportation of hazardous materials and waste shall be conducted in accordance with the applicable regulations codified in 49 CFR Parts 101, 106, 107, and 171 to 180, including, but not limited to, those related to packagings, pre-transportation functions, transportation functions, and functions not subject to the requirements of the federal Hazardous Materials Regulations.*

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

Page 9 - Project Feature PF-HHM-2 is revised as follows:

PF-HHM-2. Demolition Plans

Prior to the start of construction, the contractor would prepare demolition plans for the safe dismantling and removal of *roadways*, building components, and debris. The demolition plans would also include plans for testing and abatement procedures for asbestos-containing materials, lead-based paint, and polychlorinated biphenyls, as well as handling and disposal of treated wood waste*, such as creosote and arsenic-treated railroad ties,* and universal waste in accordance with federal and state regulations, including the 1994 Federal Occupational Exposure to Asbestos Standards, SCAQMD Rule 1403 (Asbestos Emissions from Demolition/Renovation Activities), Title 22 of the California Code of Regulations Division 4.5 (Hazardous Waste), the U.S. Department of Housing and Urban Development Lead- Based Paint Guidelines, and Title 40 of the Code of Federal Regulations Part 761.

Page 13 – The following paragraph under PF-US-1. Utility Identification and Coordination is revised as follows:

Per Metro standard practice, *as design progresses, Metro will continue to* ~~prior to the start of any demolition or construction activities, the construction contractor will~~ verify the locations of existing utilities potentially affected by construction activities. This will include coordinating with all existing utility providers for wet and dry utilities (water, sewer, gas, electric, and telecommunications) *and with private utility owners* to obtain documentation of existing utility locations. Field verification (i.e., potholing and other methods as appropriate) shall be conducted *throughout the preliminary engineering and final design phases* to document the locations of all utilities within proximity to the guideway and station foundations of the guideway and station foundations, and other project elements that may affect utilities. Based on the information from the field investigations, *the final designer will develop layouts of pipe separations based on coordination* ~~the construction contractor will be responsible for coordinating~~ with the appropriate utility owners/operators to determine specific setback requirements for each utility line and the need for any stabilization for protection in place or relocation measures. *During the construction and prior to digging, the contractor will conduct additional field verifications, which include requirements such as contacting a utility location*

service to verify the position of existing pipes, and conducting additional potholing so that the final design layouts can be confirmed or adjusted as needed.

Page 13 – The following paragraph under PF-US-2. Service Interruption Notification is revised as follows:

Per Metro standard practice, prior to the start of any demolition or construction activities, ~~the construction contractor~~ *Metro* will be responsible for coordinating with utility and service providers regarding potential utilities service interruptions due to relocation of existing utilities. ~~The construction contractor~~ *Metro* will develop a construction plan in coordination with utilities and service providers to minimize interruptions of utilities systems to the greatest extent feasible, including providing temporary connection for services that must be disconnected for extended periods of time. Further, ~~the construction contractor~~ *Metro* will develop a contingency plan in cooperation with the utility providers for emergency repairs of any utilities unexpectedly found or that disintegrated because of age during excavations. The public would be notified of areas where temporary utilities service interruptions are anticipated.

Page 13 – The following section is added:

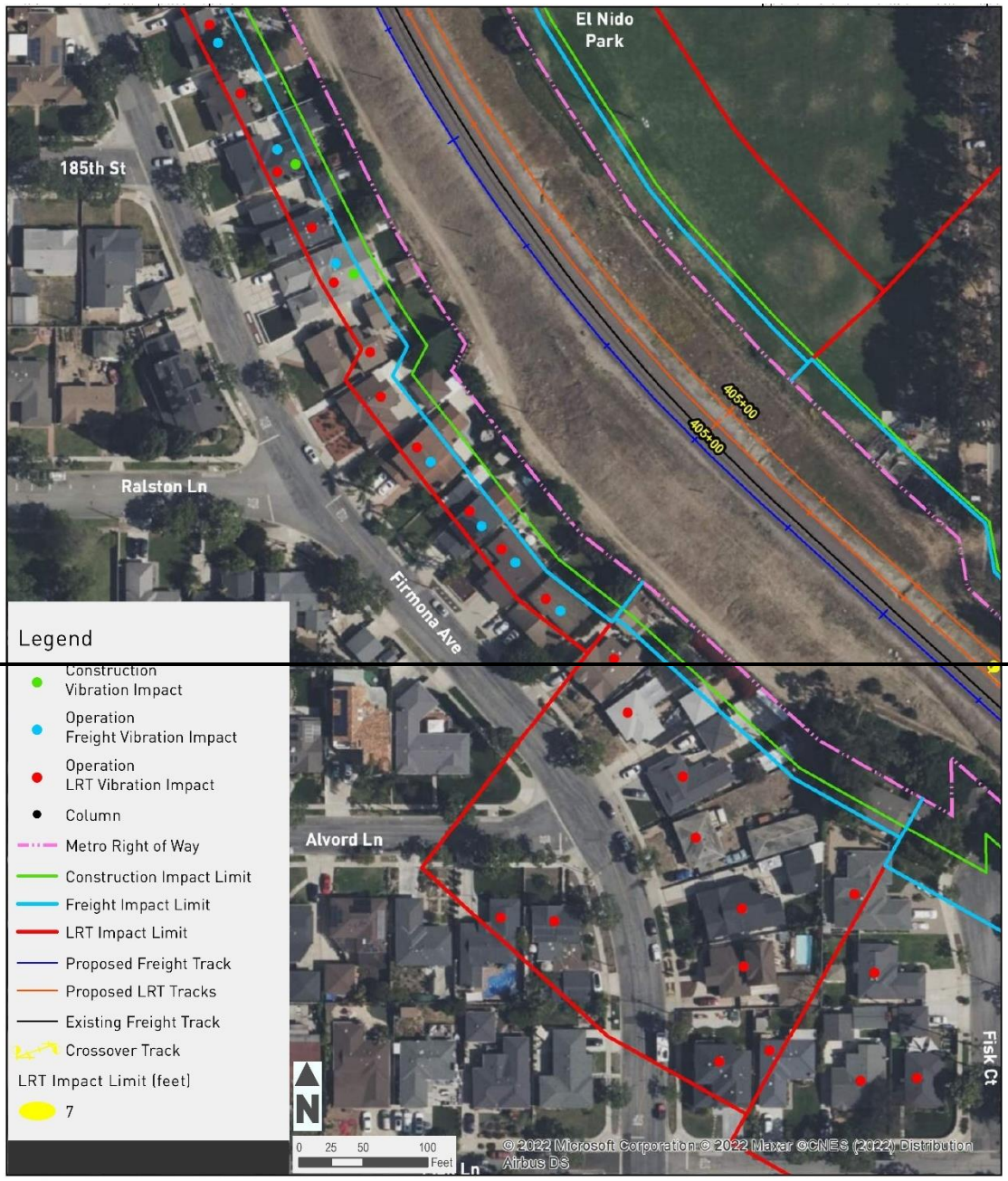
2.10 Public Services Project Features

PF-PS-1. Coordination with Torrance Refining Company and Emergency Responders

Before construction of the project and during the advanced design stages, Metro would work with the Torrance Refining Company and Torrance Logistics Company, BNSF Railway, the City of Torrance, and other City entities responsible for emergency response to coordinate emergency communication systems so that, in the event of an emergency relating to flaring or other refinery operations-related hazards, Metro could hold or detour trains to avoid traveling near the refinery.

4.25 APPENDIX 3.06-C – VIBRATION DETAIL MAPS

Pages 17 to 19 - The following figures are replaced to include a property not previously identified on the figures in the Draft EIR:

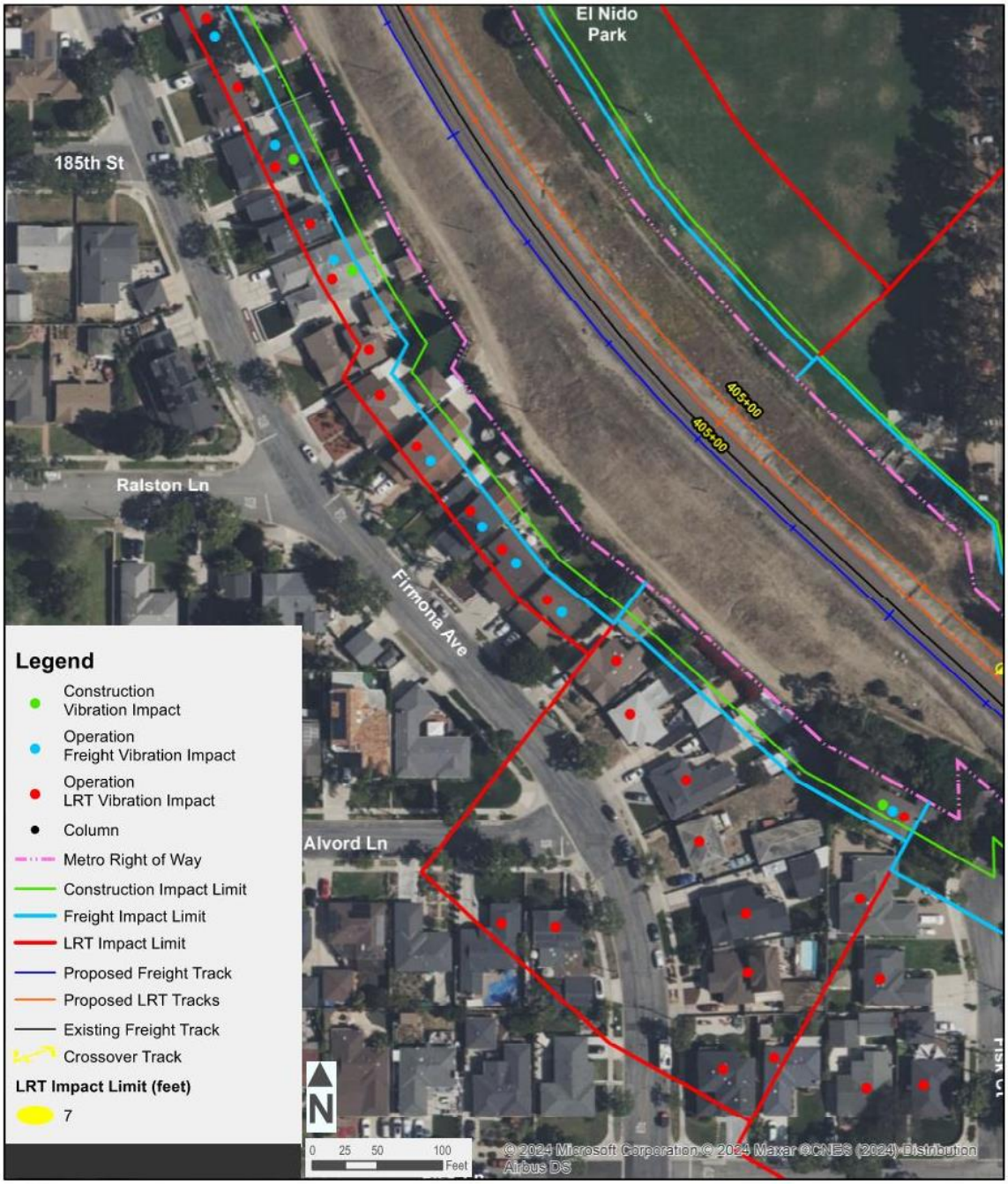


Metro

Figure 3.6-C17
Construction & Operational Vibration Impacts
Proposed Project

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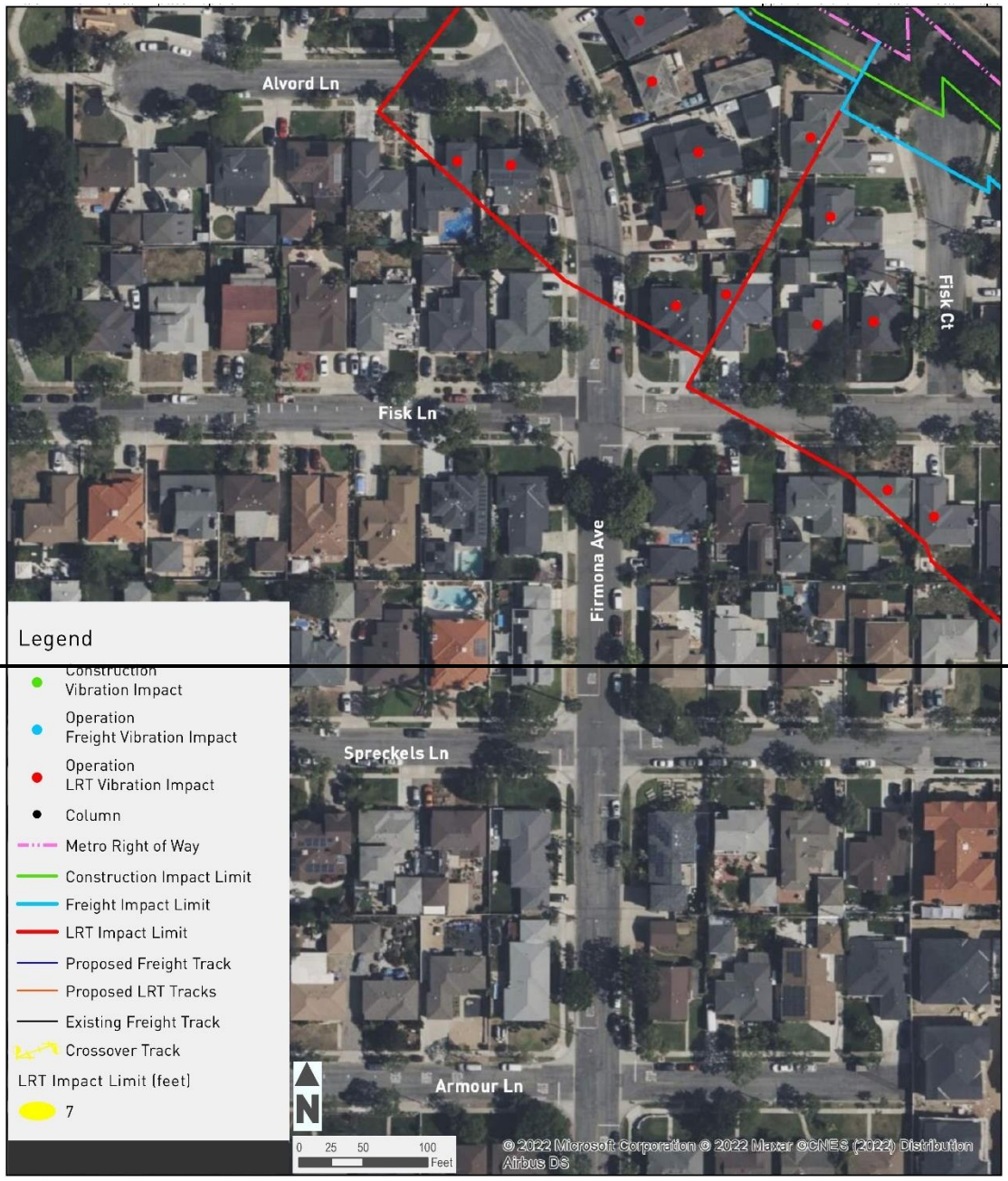
Metro



Metro

Figure 3.6-C17
Construction & Operational Vibration Impacts
Proposed Project

Metro

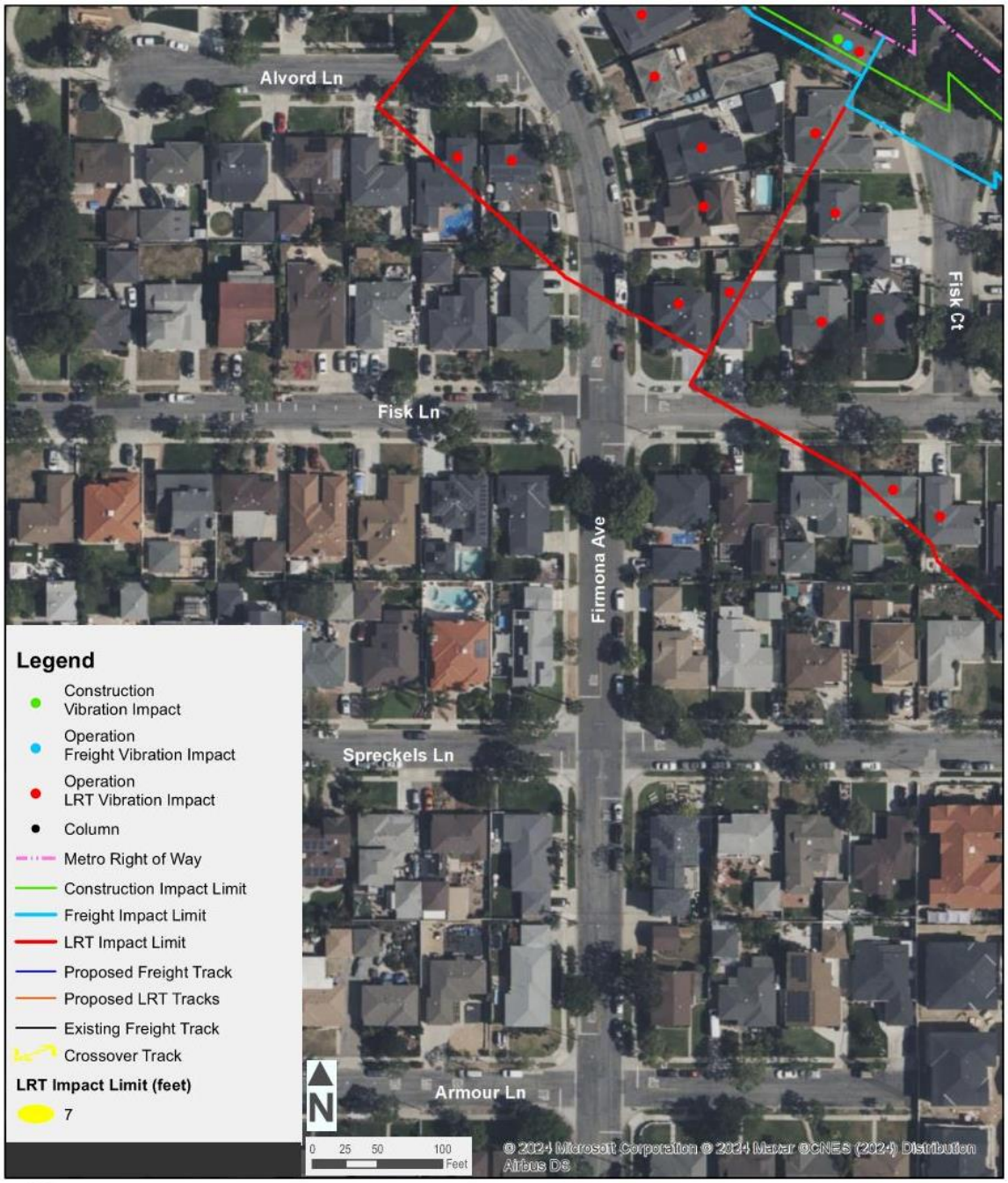


Metro

Figure 3.6-C18
Construction & Operational Vibration Impacts
Proposed Project

Page 18 of 75

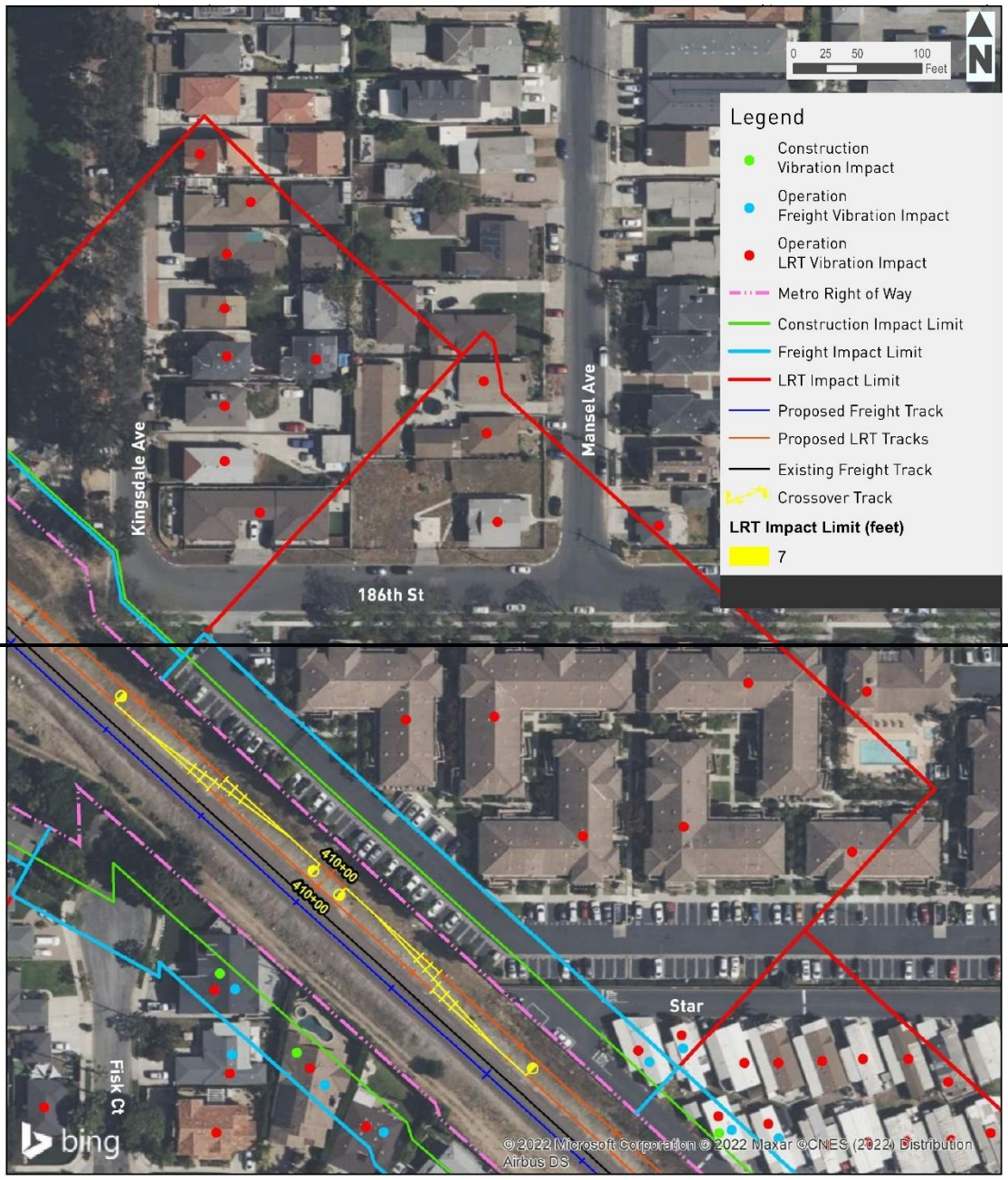
Metro



Metro

Figure 3.6-C18
Construction & Operational Vibration Impacts
Proposed Project

Metro

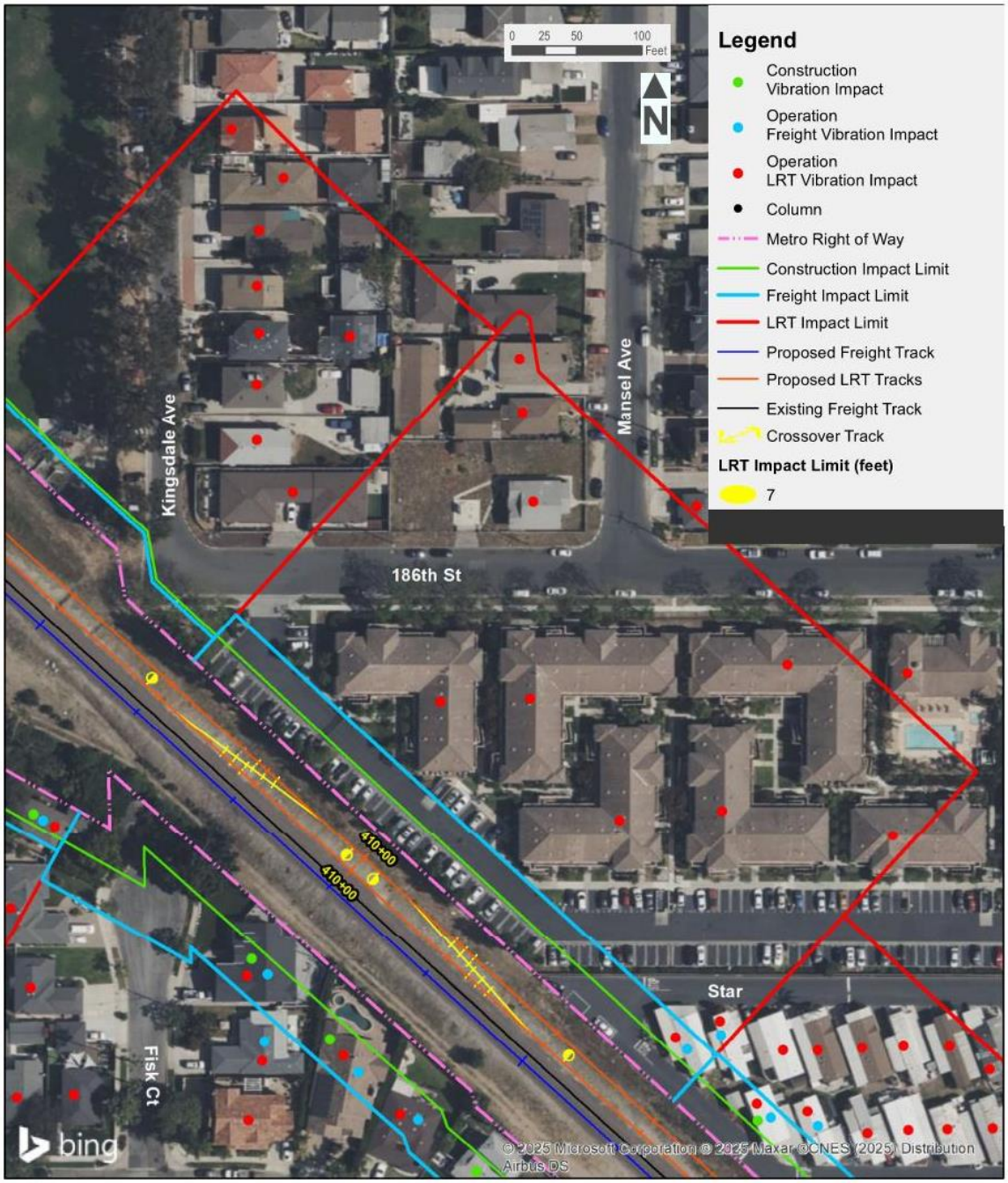


Metro

Figure 3.6-C19
Construction & Operational Vibration Impacts
Proposed Project

Page 19 of 75

Metro



Metro

Figure 3.6-C19
Construction & Operational Vibration Impacts
Proposed Project

Metro

5 RESPONSES TO COMMENTS ON THE DRAFT EIR

5.1 INTRODUCTION

Section 15088(a) of the CEQA Guidelines states that the "lead agency shall evaluate comments on environmental issues received from persons who reviewed the draft EIR and shall prepare a written response. The Lead Agency shall respond to comments raising significant environmental issues received during the noticed comment period and any extensions and may respond to late comments." This section of the Final EIR provides a list of persons, groups, organizations, businesses, and public agencies that commented on the Draft EIR, along with the responses of Metro to significant environmental points raised during the public review and comment period on the Draft EIR.

The Draft EIR was submitted to the State Clearinghouse Office of Planning and Research and circulated for public review from January 26, 2023 to March 27, 2023. During this period, approximately 2,200 comments were received via mail, email, telephone, and public hearing.

In accordance with Section 15088(c) of the CEQA Guidelines, reasoned, factual responses have been provided to the comments received during the public review period, with a particular emphasis on significant environmental issues. The comments and responses are organized as follows: agencies and organizations, individuals, and comments received at the five Draft EIR public hearings. All comments and responses to comments are included in this Final EIR and will be considered by the Metro Board prior to certification of this EIR and in any approval of the proposed project.

Each submission (e.g. comment letter, email, voicemail, comment card, petition, and hearing testimony) is assigned a number based on the order it was received. The body of each submission is separated into individual comments, which also have been numbered. This results in a tiered numbering system, whereby the first comment in Submission No. 1 is depicted as Comment No. 1-1 and so on. Copies of each submission are provided in Appendix C, Public Comments on the Draft EIR.

Comments received from public agencies are listed in Table 5.1-1; comments received from groups, organizations, and businesses are listed in Table 5.1-2; comments received from individuals are listed in

Table 5.1-3; and comments received during Draft EIR public hearings are listed in Table 5.1-4. In response to some comments received, the text of the EIR chapters has been revised. These revisions are shown in Chapter 4, Corrections and Additions, and identified within the response to the comment.

Table 5.1-1: Comments Received from Public Agencies During Draft EIR Comment Period

Submission	Name
21	Carlos Huizar, City of Torrance
22	Yvette Hall, City of Lawndale
60	Immanuel Chiang, Los Angeles County Sheriff's Department
82	Elaine Lee, California Department of Transportation (Caltrans) District 7 Division of Environmental Planning
94	Rochelle Campomanes, Los Angeles County Sheriff's Department
121	Mandy Huffman, Los Angeles County Sanitation District
123	Ruby Kwan-Davis, California Department of Fish and Wildlife
126	David Leger, South Bay Cities Council of Governments
127	Anthony Higgins, Caltrans – District 7
130	Brandy Forbes, City of Redondo Beach
132	Sean Carlson, Metropolitan Water District of Southern California
138	Brenda Moun, City of Torrance Traffic Commission
675	Daren Gilbert, California Public Utilities Commission
1990	Kim Turner, City of Torrance

Table 5.1-2: Comments Received from Groups, Organizations, and Businesses During Draft EIR Comment Period

Submission	Name
8	Teri Shinde, Torrance Logistics Company LLC
45	Tony Dolim, South Bay Estates
50	Halland McKenna, McKenna Auto Group
86	Craig St. John, Westwood Building Supplies
95	Right of Say/Redondo Beach Quality of Life Coalition
118	Barret Burt, Ganahl Lumber
119	William Oberholzer, Undisclosed Business in Torrance
120	Yuki Escovar, Torrance Area Chamber of Commerce
129	Tim Morey, Life Covenant Church
139	Barbara Graham, Torrance Refining Company
186	Torrance Democratic Club
367	Right of Say/Redondo Beach Quality of Life Coalition
399	Right of Say/Redondo Beach Quality of Life Coalition
403	Craig St. John, Westwood Building Supplies
404	Craig St. John, Westwood Building Supplies
405	Craig St. John, Westwood Building Supplies
435	Daniel Walker, Friends of Green Line
453	Ed Romero, Marathon Pipe Line LLC

Table 5.1-3: Comments from Individuals Received During Draft EIR Comment Period

Submission	Name[1]
1	Erin Hoops
2	Johnny Menhennet
3	Kyle Freitas
4	Robert Kessmar
5	Leslie Andrew Ridings
6	Joseph Guay
7	Joanna G
9	MJ Anderson
10	Mary-Ellen Martin
11	Margie Alexander
12	Janet Lindquist
13	Tom Wooge
14	N/A
15	Steven Miyamoto
16	Milan Matsumoto
17	Russell Czwleger
18	Dina Gallo
19	David M
20	Grace Peng
23	Adriana Heidman
24	Beryl Bryant
25	Duane Greene
26	Luis
27	Vincent Perez
28	Lena Pullen
29	Robert Sanchez
30	Tom Wooge
31	Tom Wooge
32	Natalia Cliborn
33	Donna Perkins
34	Matthew Hinsley
35	N/A
36	Dr. Eric Homier
37	Johnny Menhennet
38	Marvin E. Badawi
39	Matt and Lori Smalling
40	Donald Szerlip
41	John Schreiber
42	John Schreiber

Submission	Name[1]
43	Kevin Mitchell
44	Janice Tanabe
46	Yumiko Omatsu
47	Yumiko Omatsu
48	Yumiko Omatsu
49	James Divine
51	Janice Tanabe
52	Eddie Jira
53	Martha Edmundson
54	Molly Jameson
55	Paige Kaluderovic
56	Valerie Lee
57	Bob Wolfe
58	Lori Zaremski
59	Fred Montalto
61	Janice Tanabe
62	William and Mary Hall
63	Bob Cutler
64	Mindy Fang
65	Ray Hollar
66	Jan, Thomas and Amanda Kurth
67	Jose Dennis Alabaso
68	Jan, Thomas and Amanda Kurth
70	Kevin Mitchell
71	Bob Cutler
72	S Martin
73	Irene Evans
74	Todd Bassman
75	Yumiko Omatsu
76	Yumiko Omatsu
77	Courtney Allen
78	David Clasby
79	Diane Smith
80	Isobel Dozier
81	Leslie Higginns
83	Steven Boll
85	Vickie Vega
87	Janet Lindquist
88	Dr. Eric Homier
89	Eugene Balfour

Submission	Name[1]
90	Thelma Mericle
91	Gretchen Gerull
92	Grace Peng, PhD
93	Mark R. Johnston
96	Yumiko Omatsu
97	Ashlyn Neff
98	Mark Nelson
99	Akemi Pradhan
100	Holly Osborne
101	Holly Osborne
102	Kylee Kirby
103	Marvin E. Badawi
104	Joanna Velazco
105	Eugene Balfour
106	Tara
107	Tara
108	Arron McCain
109	Hank Ramey
110	Alexandros Martinez
111	Jan Kurth
112	Mark Nelson
113	Angie Souza
114	Jane Alfonso
115	William Daniel Mack
116	Rosario
117	Cheryl Williamson
122	Kevin Mitchell
124	Jan and Thomas Kurth
125	Jan and Thomas Kurth
128	Isabel (Douvan) Schwartz
131	John Schreiber
133	Lillian Katzenmeyer
134	Angelica Vicente
135	Angelica Vicente
136	Angelica Vicente
137	Joan Marks
140	Jan Kurth
141	Lisa Francois
142	Luis Marroquin
143	Michael Kim

Submission	Name[1]
144	Monique Negrete-Mitchell
145	Otto Asencio
146	Ray Hollar
147	Tatiana Gomez
148	Sam & Eloise Elder
149	Traci Fuentes
150	Angelica Vicente
151	Alejandra Zuniga
152	Arohi Sharma
153	Colleen Malone-Villegas
154	Blake Jung
155	Chelsea Schreiber
156	Chris Horsman
157	Clement Alaba
158	Clement Alaba
159	David Barajas
160	DeNise
161	Glenn E. Stanfield
162	Gianna Mitchell
163	Janice Tanabe
164	Ana Maria Houck
165	Jimmy Gow
166	John Clifford
167	Jose Vera
168	Kevin Mitchell
169	Phillips
170	Lisa Francois
171	Carlos Cruz-Aedo
172	Mike Kim
173	Betty Fisk
174	Anonymous
175	Mark Nelson
176	Lena Poland
177	Mike Cook
178	Ninnette Martinez
179	Ninnette Martinez
180	Ninnette Martinez
181	Rita Hidalgo
182	Rita Hidalgo
183	Rita Hidalgo

Submission	Name[1]
184	Sukrit Verma
185	Tammy Harrison
187	Alejandro
188	Ana Maria Vicente
189	Betty Lam
190	Doris Hofmann
191	Rita Hidalgo
192	Manuel Hidalgo
193	Radka Samuel
194	Humberto Barrera
195	Daniel G
196	Alex Medina
197	Joanna Velazco
198	Bryan Henry
199	Alberto Maldonado
200	Megan N Jorge
201	Chris Horsman
202	William Kolinsky
203	Anonymous
204	Jose Valenzuela
205	Jouanna Sanchez
206	Michael Stary
207	Lily Navarro
208	Betty Lam
209	Blake Jung
210	Carlos Gomez
211	Carmen Reyes
212	Clement Alaba
213	David Barajas
214	Doug Boswell
215	Jacqueline Caro
216	Jimmy Gow
217	Jonathon Chue
218	Wendy Mretandes
219	Teresa Gutierrez
220	Jessica L Ray
221	Juan Benitez
222	Carmen M.
223	Fernando
224	James Johnson

Submission	Name[1]
225	Guillermo Chavez
226	Macario Gastelum
227	Albely Cobon
228	Anonymous
229	Juan Guzman
230	Ashley Guzman
231	Arcelia Martinez
232	Wendy Martinez
233	Adelina Rodriguez
234	Frank A Rodriguez
235	Fredy Rojas
236	Guadalupe Alvaro
237	Rose Molina
238	William Tiernan
239	Lorena Rodriguez
240	Rebeca Aquino
241	Bryan Chavez
242	Dodeo Doviz
243	Jorge Garcia N.
244	Marychuy Orendain
245	Martha Dilger
246	Annette Owens
247	Traci Fuentes
248	Iris Sosa
249	Frank Fuentes Jr.
250	Derrick Gregory
251	Humberto Barrera Jr
252	Ana Barrera
253	Juan Almaraz
254	Oscar Barrera
255	Anthony Fuentes
256	Piles J Dilger
257	Susana Barrera
258	Veronica Lopez
259	Dominic Sanchez
260	Robert A. Salone
261	Marquise Riley
262	Judy Wells
263	Scott
264	Elizabeth Meister

Submission	Name[1]
265	Jeremy Brown
266	Jeffrey Braude
267	Jennifer Lamb
268	Andrew Nunez
269	Delfina De Leon
270	Rosalina Gutierrez
271	Dezarae Ibarra
272	Steven Duran
273	Soledad Linares
274	Ma Del Rosario Almaraz
275	Jennifer Lee
276	Pedro Garcia
277	Luz Barrera
278	Kelly Kolinske
279	Teresa Lopez
280	Marisa Cunanan
281	Ninnette Martinez
282	Isabel Fernandez
283	Darry
284	Connie Santana
285	Enrique Flores
286	Justin Huh
287	Brandon Crockett
288	Kevin Crockett
289	Nilo Caraan
290	Mike Mangione
291	Alex Ochoa
292	Valeria Krocak
293	Cristian Montiel
294	Charles Ellingson
295	Chelsea Schreiber
296	Viet Truong
297	Michael Kim
298	Adam Korp
299	Jennifer Dowd
300	Bryan Lee
301	Blake Jung
302	Alejandro
303	Zein Obagi
304	Yumiko Omatsu

Submission	Name[1]
305	Wayne Craig
306	Velia Gomez
307	Tony Galva
308	Chelsea Schreiber
309	Ted Hofmann
310	Ted Hofmann
311	Ted Hofmann
312	Ted Hofmann
314	George Gillen
315	Glen Brackenridge
316	Glen Brackenridge
317	Glen Brackenridge
318	Glen Brackenridge
319	Glen Brackenridge
320	Glen Brackenridge
321	Glen Brackenridge
322	Glen Brackenridge
323	James Tucker
324	Jamison Hughes
325	Jan Kurth
326	Jerome Chang
327	Jose Jimenez
328	Julie Young
329	Lily Kua
330	Angeline Souza
331	Bryan Henry
332	Dana Icaza
333	Doug Boswell
334	Dre Nicole Amundson
335	Janice Tanabe
336	Janice Tanabe
337	John Schreiber
338	Mark Nelson
339	Mark Nelson
340	Mark Nelson
341	Michael Garlan
342	Michelle Hughes
343	Monique Negrete-Mitchell
344	Morgan Schultz
345	Paul Miller

Submission	Name[1]
346	Ray Hollar
347	Ray Hollar
348	George Gillen
349	Roy Bolling
350	Ruby
351	Ryan Rodriguez
352	Stanley Hiroshi Wada
353	Jeanne Bellemin
354	Mr. & Mrs. G. Floratos
355	Anonymous
357	April Kubachka
359	Keith Kubachka
360	Lesley Phillips
361	Mark Nelson
362	Michael Kim
363	Randall Abram
364	Ray Hollar
365	Ray Hollar
366	Ray Hollar
368	Karen Ruby
369	Theodore Otvos
370	Theodore Otvos
371	Yumiko Omatsu
372	Adam Karp
373	Monique Negrete-Mitchell
374	Angelica Vicente
375	Holly Osborne
376	Steve & Michelle Polcari
377	Blake Jung
378	Conor Sullivan
379	David Bailey
380	Denise
381	Doug Boswell
382	Frank Fuentes
383	Ian Stern
384	Ignatius Lin
385	James Hill
386	Janice Tanabe
387	Jeanette McGuire
388	Jennifer Chung

Submission	Name[1]
389	Karen
390	Karen Ruby
391	Kayla Mangione
392	Ken Prinzi
394	Megan
395	Michael Sullivan
396	Michael Sullivan
397	Michael Sullivan
398	Holly Osborne
400	Jeanne Bellemin
401	Janice Tanabe
402	Eugene Balfour
406	Janice Tanabe
407	Burch
408	Lauren Faith Niro
409	Chris Ng
410	Janice Tanabe
411	Jeanne Merchant
412	Kim Wong
413	Angeline Souza
414	Angeline Souza
415	Alan Ruiz
416	Colleen M. Villegas
417	Ints Luters
418	Janice Tanabe
419	Lillian Katzenmeyer
420	Michael Sullivan
421	Michael Sullivan
422	Michael Kim
423	Phyllis Shoemaker
425	Sabrina Henriquez
426	Theodore Otvos
427	Theodore Otvos
428	Wally Marks
429	Lillian Katzenmeyer
430	Mike Jamgochian
431	Daniil Kozhemyako
432	Holly Osborne
433	Karen Reed
434	Barb Bush

Submission	Name[1]
436	Jay Gould
437	Kimiko Shiozaki
438	Mark Nelson
439	Maureen Smith
440	Monique Negrete-Mitchell
441	Philip Breuer
442	Robert Sanchez
443	Roberto Escobar
444	Sarah Straton
445	Sharon
446	A. Fierro
447	Yumiko Omatsu
448	Amy LaCoe
449	Jacqueline Caro
450	Carlos Torres
451	Greg & Janett Paaske
452	Pat McLane
454	Anonymous
455	Henry Martinez
456	Mark Nelson
457	Robert D. Stoffel
458	Nate
459	The Olsen Family
460	Rene Arreygue
461	Holly Osborne
462	Jan Tanabe
463	Dan & Karen Pryor
464	Tara
465	Dana Icaza
466	Ryan Mendivil
467	Helen Evans
468	Jeffrey Katz
469	Angel La Canfora
470	Marcelo Calcagnotto
471	Adrian Rops
472	Robert Jung
473	Judith and William A Hying
474	Richard Ree-Uk Kim
475	Gary Duncan
476	Debra Powers

Submission	Name[1]
477	Arif I Shaikh
478	Tom Hascup
479	Brian D. Gee
480	David Hannum
481	Mark Roulette
482	Phil Garner
483	John McLaughlin
484	Yvonne W Zoon
485	James Lake
486	Edward Miyashiro
487	Alicia L Baughfman
488	Jeff Henges
489	Bryan Higgins
490	Jeff
491	Brandon Pennington
492	Mark Michaelian
493	K Lee
494	Frank Kenny
495	Joan Spratt
496	Allan and Stacy Holtz
497	Norman Tran
498	Randy and Martha Shetter
499	Hans G Kuck
500	Erika Lytle
501	Esther Audrey
502	Donald A. Oden
503	Fred Ruby
504	Pamela Wilkerson
505	Terry Butler
506	Rosa Sahara
507	Linda Hornbeck
508	JoAnne Sanger
509	David Zhang
510	Rick Grefsrud
511	Juan Carlos Aguila, Ph.D.
512	Hung T. Huynh
513	Christopher L Foley
514	Max Majcher
515	Steve Chan
516	Smitcha Buranasombati

Submission	Name[1]
517	Linda Blumenthal
518	Merlin Bird
519	Jim Mills
520	Ken Lucas
521	Kay Peterson
522	Raymond Peterson
523	Terry Dunseith
524	Mark Torres
525	Sean
526	William & Belinda Gonzalez
527	Wudhidham Prachumsri
528	Justin Neems
529	Frances Koo
530	Anonymous
531	John Farris
532	Ronald Chan
533	Yvette Reed
534	John Farris
535	Joe Miyamoto
536	Paul Powers
537	Bradford Eastman
538	William
539	Alexa Frazier
540	Steven Schulz
541	Liz Torres
542	Steve Brueggeman
543	Dale Gereaux
544	Richard Mink
545	John
546	Chelsea
547	Patrick
548	Maria Hernandez
549	Ryan Fulton
550	Sylvanus Finney
551	Natalia Giacomelli
552	Cheryl Shenefield
553	Sheng Lee
554	Ben Takahashi
555	Al Derago
556	Betty Derago

Submission	Name[1]
557	Chuck Driesler
558	Dennis Bosch
559	Amber Hernandez
560	Ronald Omatsu
561	Joni Owens
562	Juanita Leon
563	Masashi Kawamoto
564	Michael Woodard
565	Silvy F.
566	Izzy Flores
567	Gloria Ohe
568	Jim & Laura Ackermann
569	Zachary Mayo
570	Sandy Bruce
571	Eric Barricklow
572	Yoolee Suhr
573	Michael Serafin
574	Sara Kim
575	Albert Belanger
576	Andreas
577	Marc Horton
578	Frank Tippin
579	Anthony Panipinto
580	Wm. Champlin
581	Miller
582	Philip Miyasato
583	Elaine
584	Alfonso P Gonzales
585	Makoto Saito
586	Eva Gonzales
587	Cynthia Hubbard
588	Baburaj Nair
589	Donna Perkins
590	Betsy Walli Sadur
591	Robert Sadur
592	Bruce Yamasaki
593	Helen
594	Jeanette Garcia
595	Erika
596	Tim Goodrich

Submission	Name[1]
597	Josh Hoover
598	Carl Petry
599	Keith Wicker
600	Julie Kohus
601	Soad Hakim
602	Linda Eremita
603	Phil Bahng
604	Shozo Yoshikawa
605	Hans G Kuck
606	Yared
607	John Joseph
608	Marisela Smith
609	Jasper R Eanes
610	Nae Shin
611	Jing H Chang
612	Navia Davis
613	David Holmes
614	Jennifer Wesner
615	Dan Devries
616	Michael Handley
617	B. Enis
618	Zunilda Cossio
619	James Shu
620	Lawrence Lau
621	Geoff Rizzo
622	Glenda Fukunaga
623	Philip Porush
624	John Fowler
625	Kelly Kohagura
626	Gailene Tofiga
627	Brian Mckibbin
628	Byron Jung
629	Guillaume Rouault
630	Curt Nimori
631	Ryan Lee
632	Ella Dixon
633	Gary Inouye
634	Harper Munro
635	Ilia Munro
636	Sue Cheng

Submission	Name[1]
637	Michael Daley
638	Mr and Mrs Senichi Sumi
639	Se Lee
640	Sunnyra Joo
641	Aldrin Hie
642	Konstantin Majarov
643	William Brown
644	Suzette Savard
645	Stella Yang
646	Han Jo Park
647	Evan Loshin
648	Janice Lee
649	Jennifer Dahm
650	Alicia Spitzer
651	John Lucas
652	Gregory S. Laurinat
653	Philip & Madonna Kielty
654	Vince Long
655	Linda Zeik
656	Mary Driggs
657	Briza Covarrubias
658	Mike Dabas
659	William & Mary Stahura
660	MaryKay Rodriguez
661	Sherry Jenkins
662	Edward Fries
663	Carl D Paquette
664	Stanley Hiroshi Wada
665	Richard Maeda
666	Susana Quintanar
667	Carmen Reyes
668	Melissa Hoppe
669	Danny Hom
670	Eric Haaland
671	Anna Mavromati Duncan
672	Amy LaCoe
673	Rosalia Merino
676	Khela Guirguis
677	Anissa Blanco
678	Rari Matic

Submission	Name[1]
679	Jose Vera
680	Bianca Blanco
681	Angie Aragon
682	Akende Foluso
683	Jordi Nus Garrell
684	Silvestre Hidalgo
685	Silvestre Hidalgo
686	Anonymous
687	R.W. Way
688	Michael Valdez
689	Victor Akende
690	M. Tuckett
691	Barbara J. Halligan
692	Fred. G Richards
693	J.C. & M.M. Kelly
694	Jose A. Algire
695	Michael Kim
696	David Mach, City of Torrance
697	Jan Kurth
698	Colleen M. Villegas
699	Suzan Hubert
700	Tri Vo
701	Tania Rodas
702	Crystal McInerney
703	Glenn Schnekenburger
704	Colin McGee
705	Nancy Leonardo
706	Andy Merida
707	Luz Barrera
708	Kathy Leon
709	Talin Gil
710	Mario Alvarez
711	Mark Nelson
712	Ruby
713	Samuel Wise
714	Dana Thayer
715	Prakash Belur
716	Sang Wol Han
717	Isabella Guiterrez
718	Donna Minson

Submission	Name[1]
719	Stanley R. Kelley
720	Jack Lyons
721	Linda Crickmore
722	Rahul Simlote
723	Jill Reed
724	Rose Stein
725	Wendy Carrillo
726	Peter & Patricia Martini
727	Beth Sandoval
728	Sharon Wu
729	Seema Turner
730	Adam Garrison
731	Fred Peitzman
732	Alexandros Martinez
733	Patricia Spiegel-Giglio
734	Wilson Ly
735	Joshua Gomez
736	Joseph Tevita Rocha
737	James Fearn
738	Jenifer Frial
739	Shauna Law
740	Jeanne Fisher
741	Jacques Monier
742	Paula Gates
743	Michale Wegnes
744	Bill Reynolds
745	N. Maas
746	Frank L. Newman Jr.
747	Nancy Dykstra-Curtin
748	Robert Hanmer
749	Michele Kidman
750	J. Gardinale
751	David Lin
752	Mark Navarra
753	Annette Weisse
754	Tommy Louviere Jr.
755	Jacqueline Cysneros
756	Anson Tran
757	Peter Nguyen
758	Zac Lee

Submission	Name[1]
759	Phat M.
760	Anne Swanson
761	Eddie Harris Jr.
762	Andrei Yermakov
763	Lilia Yermakov
764	Norberta Estrada
765	Martha Shetter
766	Nao Pabalan
767	Alan Pabalan
768	Randy Shetter
769	Jason Nishiyama
770	David Cobb
771	Devin Valdez
772	Jordyn Kieft
773	Jacqueline Ecklund
774	Tiffany Lopez
775	Lita Garcia
776	Melanie Drieke
777	Christopher Drieke
778	Rosa Fontana
779	Victoria Parrish
780	Abdulvahob Nabiev
781	MD Smith
782	Hunter White
783	Mary Napoleone
784	Kristina Scruggs
785	James Ecklund
786	John Flanagan
787	Stefan Ecklund
788	Stephanie Ishioka
789	Carl Paquette
790	Sandra Jo Williamson
791	Dennis Piotrowski
792	Elisabeth Bailly
793	William Champlin
794	Tiffany Jones
795	Stephanie Cati
796	Kevin Hernandez
797	Joan Hardy
798	Erika Hatzenbuhler

Submission	Name[1]
799	Glenn Hatzenbuhler
800	Jeff Earnest
801	Susan Earnest
802	Daniel Lim
803	Daniel Gonzalez
804	Alison Brown
805	Aqsha Munshi
806	Aamir Kuriswala
807	Cornelius Fong
808	Richard Krason
809	Leonarda Krason
810	Felisha Black
811	Aguilar
812	Daniel Schwartz
813	Thomas Shigemitsu
814	Sapan Shah
815	Tam Nguyen
816	Paul Miller
817	Mary Miller
818	Matthew Bilodeau
819	Al Tatro
820	Angela Brizuela
821	Michale Kirby
822	Rebecca Eastman
823	Tammy Clark
824	Scott Clark
825	Jason Blain
826	Ins Luters
827	Anonymous
828	Terrence Chen
829	Daniel B. Gast
830	Richard Stenhouse
831	Isabel Gutierrez
832	Kaylyn Fukuhara
833	Margaret Schaffmeir
834	Thomas Penland
835	Justin Hollingsworth
836	Nancy Cruz
837	Vanessa Gonzalez
838	Daisy Herrera

Submission	Name[1]
839	Al Tatro
840	Carol Truitt
841	Rebecca Reeves
842	Tim Goodrich
843	Dennis Piotrowski
844	Alan Ariel Carlos
845	Jose Dennis Alabaso
846	Ryan Saruwatari
847	Nathan Koller
848	Craig Haller
849	Myles Honda
850	Jean Katow
851	Ronald Rucker
852	Molly O'Callahan
853	George K. Chen
854	Marifrances Trivelli
855	Nelsy Jimenez
856	Diane Ki
857	Kirtan Tank
858	David Lambi
859	Raihan Fazalbhoy
860	Adrienne Greenfield
861	Camille Randolph
862	Timothy Gould
863	Lyle Sanders
864	Kitty Shiao
865	G Patricia Stewart
866	Russell Stewart
867	Peter Spartalis
868	Julio Ceballos
869	William Laronal
870	Toni Wright
871	Ryan Uyehara
872	Melfern Claro
873	Winston Zhou
874	Brennan Long
875	Jose Dennis Alabaso
876	Thomas Elder
877	Yuandan Liu
878	Raymond Peterson

Submission	Name[1]
879	Kay Peterson
880	Sunny Zhou
881	Frank Huang
882	Sarah Chiang
883	Caroline Kong
884	Karl Kohl
885	Alexander
886	Mike Palmer
887	Jose Roldan
888	Maria Pescheryakova
889	Steven Gerhardt
890	Al Tatro
891	Miguel Dvid
892	Sheila Fierro
893	Kim Turner
894	Dennis Bosch
895	Calin Chiorean
896	Darren Uyematsu
897	Michael Fetaru
898	Nikola Renard
899	Michael Brenk
900	Alex Emly
901	Kyle Freitas
902	Alexandra Flores
903	Jamelia Davenport
904	Michael Kosidlak
905	Andrea Retana
906	Kathy Wood
907	Dawn Ng
908	Kevin Griswold
909	Andre Flores
910	Judith Gerber
911	Patti O' Reilly
912	Barbara Kelly
913	Mauricio De La Torre
914	Alonso Muñoz
915	Skyler Reynoso
916	William Chuh
917	Lyle Sanders
918	Nedeen Nasser

Submission	Name[1]
919	Ryan Bada
920	Raymond Fisher
921	Michelle Hughes
922	Frank Kraus
923	Sawyer
924	Rudy Onate
925	Micah Alex
926	Shin Furukawa
927	Chau Yang
928	Jeanne Bala
929	Patrice Watanabe
930	Wayne Watanabe
931	Zen Rosenthal
932	Stephen Kawalko
933	Traveion Bell
934	Juan Delgado
935	Victor Alvarado
936	Richard Krason
937	Kevin Chan
938	Andrea Seo Bauer
939	Brian Rodriguez
940	Linda Amato
941	Leroy Jackson
942	Rebecca Poirier
943	L.R. Rowe
944	Janet Dirks
945	Scott Wood
946	Marian Kravitz
947	Shawn Denny
948	Joanne Verespej
949	W. Hamada
950	Steve Oshiro
951	Robin Fields
952	Paul Matsumoto
953	Nicki Noble
954	Craig Kazin
955	Mark Chavez
956	Jahja
957	Reagan Woo
958	Cliff Weinan

Submission	Name[1]
959	Stan Ponegalek
960	David Sakai
961	Pamela Dieter
962	Frieda Wang
963	Allen Triebull
964	Charles Dorsey
965	Robert G. Dye
966	Catherine Clarke
967	Nancy Bridi
968	Beverly Ricketts
969	Juan Cabeza
970	Joyce Henderson
971	Anonymous
972	M. Suarez
973	Lynn
974	David H. Lee
975	Judith Crosby
976	DePland
977	Christopher Caunt
978	Bruce Hamilton
979	Michele Kidman
980	J. Gardinale
981	Robert Allen
982	Steve Marchki
983	Thomas Fukman
984	Duane Sung
985	John Whang
986	Ray Portka
987	Judith Carter
988	Vijenera Joseph
989	Offutt
990	Leroy Kerahen
991	Pablo Delgado
992	Janet Wade
993	Bernadette Kociemba
994	Carl Willison
995	John Choy
996	David Seager
997	Richard Kim
998	Randall Leak

Submission	Name[1]
999	Janet Colmerauer
1000	Mr. & Mrs. Hardin
1001	Elizabeth Evans
1002	Mary Strenn
1003	Fred Missman
1004	Karen Wheeler
1005	Jan & Dan Moorehouse
1006	Rogy
1007	Sandra & Bill Goetz
1008	Robert & Paula Castro
1009	Linda & Thomas Hart
1010	Russ & Triss Stewart
1011	Charles Ford Jr.
1012	James McGee
1013	Barbara Safah
1014	Pauline Acherman
1015	Edith Reid
1016	John De Rago
1017	Judy Douglas
1018	Daniel McKay
1019	Anonymous
1020	Lillian Isobe
1021	David & Diane Brown
1022	Ron & Karen Ury
1023	Mr. & Mrs. Mark Hansen
1024	Anonymous
1025	C. Rauser
1026	Donn Plewes
1027	Jane Kamiya
1028	Frank Mekrut
1029	Elizabeth Higgins
1030	Michael Maiuri
1031	Camille Henderson Cardenas
1032	Loren Heard
1033	Anonymous
1034	Robert and Linda Culpeper
1035	William & Claudia Fischer
1036	Martin & Ann Gallagher
1037	Sheldon Katzer
1038	AJ & Richard Ziman

Submission	Name[1]
1039	David Frazee
1040	Joyce Nagel
1041	Linda Howard
1042	Henry Yee
1043	Nelson Duenas
1044	Theo Misaresh
1045	Resident
1046	William Haffey
1047	Janice Collins
1048	Sherwin Rubin
1049	Noema Lorenzo
1050	Daniel Dalton
1051	Anthony Garcia
1052	Jay Hoffman & Alicia Jacobsen
1053	Kyle Freitas
1054	Terry Masaoka
1055	Eduardo Paiva
1056	Joe Molloy
1057	Fred Won
1058	James Won
1059	Jeff O'Brien
1060	Dolores Merendo
1061	Naeim Soliman
1062	Pozos
1063	Ronald Murakami
1064	Mike Marin
1065	Lisa Chun
1066	Roberta Siegel-Okumura
1067	Sara
1068	Noreen Tsumaki
1069	Gabriel Catalogne
1070	Bryan Thompson
1071	Shiv Murti
1072	Roxanne Morrow
1073	Tim Knerr
1074	Deborah Comstock
1075	Theresa Barke
1076	Dorothy Derricks
1077	Arthur Oshiro
1078	Scott Bauer

Submission	Name[1]
1079	Frank R.
1080	Judy Tizon
1081	Romanelli
1082	Sylvia S.
1083	Claudia Brubaker
1084	Amjadi's
1085	Nancy Taneka
1086	Mary & Alan Shadbourne
1087	John McGee
1088	Fred Wolfe
1089	James Bailey
1090	Kelly Hartman
1091	Georgia Williams
1092	Robert Hernandez
1093	Ray Karimoto
1094	Melody Knerr
1095	Karen Currey
1096	Lori Yamasaka
1097	Niparpon Johansen
1098	Marciano Saldana
1099	Hamin
1100	Moien Bigdeli
1101	Allegra DeMott
1102	Deb White
1103	Kevin White
1104	Sherry Roberts
1105	Tyler
1106	Charles Osborne
1107	Moss Misiaszek
1108	Leo Tsai
1109	John VanderVennet
1110	Tobeylynn Birch
1111	Ed De La Cruz
1112	Hector
1113	Johnson
1114	Victoria Nagano
1115	Travis Wilmer
1116	Bob Kelchner
1117	James Knerr
1118	Steph Knerr

Submission	Name[1]
1119	Jules Rivers
1120	Bill & Elaine McMullen
1121	Steven Dewberry
1122	S. Zirkes
1123	John Schlosser
1124	David Smith & Guadalupe Vicon
1125	Jiteshkumar Patel
1126	David Placenti
1127	Anonymous
1128	Abir Chakraborty
1129	T.B.
1130	Roxanne Griffin
1131	Linda Brown
1132	Mitchell Morgan
1133	Joseph Gualtiere
1134	JoAnn Cope
1135	Elena Castillo
1136	John Heins & Yvonne Vanherk
1137	W. Calzadella
1138	Barbara Varou
1139	Marcia & Wilma Noboa
1140	Michael J. Gibson
1141	Patty Nishi
1142	Young Cheng
1143	Anonymous
1144	Mary H. Peters
1145	Eloise & Pat Shea
1146	Michael Streibig
1147	Carter V.
1148	Kent Hori
1149	Janis Berges
1150	Sandra Parvis
1151	Tom Onalfo
1152	Patricia Roderick
1153	Tom & Eileen Pontius
1154	Anonymous
1155	Robert Krauss
1156	Joseph Palsulich
1157	Pat & Mitchell Janson
1158	Wayne A. Holman

Submission	Name[1]
1159	F. Momohara
1160	Simeon Smith
1161	Pete & Mary Eliopulos
1162	Allison Fuentevilla
1163	Anonymous
1164	Katsuaki Matsuda
1165	Anthony Galante
1166	C.A. Turner
1167	Winnie C. Stanfield
1168	Nely Go
1169	Lorette Muchmore
1170	Virginia Nelson
1171	Mark Dunn
1172	Wayne Mityoshi
1173	Linda J. Muir
1174	Suwannee Adomien
1175	Jon M. Ziegler
1176	Michael Dillenback
1177	Patricia Miyoshi
1178	Rajeswari Gounder
1179	Julie Snakenborg
1180	C. Bedrossian
1181	Dario M. Chavez
1182	Gloria Londono
1183	Alvaro Lopez
1184	Vincent Deneux
1185	Tony Yang
1186	Charles Delio
1187	Tim
1188	Sarah Winfrey
1189	Young-Joon Mok
1190	Isabel Douvan
1191	Melanie White
1192	Timothy Ma
1193	Irene Ma
1194	Matteo Interlandi
1195	Mohamed Fassy Jayah
1196	Abdulvahob Nabiev
1197	Alan Kita
1198	Charles Wilson

Submission	Name[1]
1199	Dawn Kita
1200	Xianming Liu
1201	Donna
1202	Kevin Hetrick
1203	Avelina Daum
1204	Mark Nakano
1205	Nelson Wong
1206	Catrice Nakamura
1207	Jack L.
1208	Alkistis Tsitouri
1209	Kelly Lowe
1210	Laura Harder
1211	Kandi Hsin
1212	Jeff Patton
1213	Lin Van Gelder
1214	James Van Gelder
1215	Jan-Michael Sanchez
1216	Emilie Hunter
1217	Pat Leighton
1218	Abraham Que
1219	Paul Yamada
1220	Celia Lee
1221	Kaiulani Lie
1222	Ernie Roberts
1223	Daniel Will
1224	Brian Quinn
1225	Gregg DeNeui
1226	Jimmy Gow
1227	Rhonda McNeil
1228	Kimberlee Ann James
1229	Jackson N. Henry
1230	Brian Getchius
1231	Eric Chen
1232	Mike Selfridge
1233	HL
1234	Michael Dillenback
1235	Patricia Miyoshi
1236	Christopher Rutte
1237	Richard Long
1238	Enrique Garcia

Submission	Name[1]
1239	Louis Quaglietta
1240	Catherine Emerson
1241	Jerri Holmgren
1242	Charles A. Pineros
1243	Ruth Ann Gray
1244	Harder Munro
1245	Terry Engle
1246	DJ Ponder
1247	Marilyn Deborah Maxwell
1248	Russell Tsuji
1249	Earl Nolan
1250	Alfred Jung
1251	Mariana Amezcua
1252	Se Hyun Sung
1253	Bonnie Inskeep
1254	Michael J. Gibson
1255	Jerry Armstrong
1256	Michael Hart
1257	Y. Mcleod
1258	Jessie Lee
1259	Jungok
1260	Keith Herbers
1261	Charles Diehl
1262	Cuna Chona
1263	Mark Williams
1264	Shankar Pachari
1265	Ron Sapp
1266	Jim Childers
1267	Rebecca Tubbs
1268	Gabriel Ponciano
1269	Steven Lindsey
1270	Albert Castro
1271	Josh Standifer
1272	Owen
1273	John Stanton
1274	Brendon Reyell
1275	Dale Case
1276	Kathy
1277	E. Atkins
1278	Jason T. Tam

Submission	Name[1]
1279	Marc Lawrence
1280	Michael Wermers
1281	Alexandros S. Martinez
1282	Diana Davis
1283	Bryan
1284	Perry Shields
1285	Daniel
1286	Virginia Darnell
1287	Tejas Parmar
1288	L. Nakashima
1289	Dave & Rena Hayami
1290	Swee Woo
1291	Robert Boiles
1292	Jeff Wong
1293	Larry Turgeon
1294	Jose Dennis Alabaso
1295	Anonymous
1296	Sean Murphy
1297	Ton-Ming Chieh
1298	Benito Miranda
1299	Anonymous
1300	Steven Chamberlain
1301	Bonnie Van Alphen
1302	Anonymous
1303	Noriko Fujita
1304	Harry & JoAnn Ross
1305	Susan Lamotte
1306	Joseph A Spilka
1307	Michael Stull
1308	Ron Botelho
1309	Mr. & Mrs. Aguiar
1310	D. Fisher
1311	Chih Chang
1312	Anonymous
1313	Everett Kirsch
1314	Kikuchi Family
1315	Donald Nakamoto
1316	Beverly Findley
1317	Edmund & Kerry Cababa
1318	Mrs. Deborah DeLoud

Submission	Name[1]
1319	Craig Scdoris
1320	Lynn Shirvandehi
1321	Bernas
1322	Dianne & Jerry Baltz
1323	Jenny Sakamoto
1324	Timothy McAkee
1325	Anonymous
1326	Janet Sieffert
1327	Fedrick A. Mohit
1328	Tim Calkins
1329	Oliver King
1330	T. Elder
1331	Helen Itabashi
1332	Susan Hale
1333	Francesco Aiello
1334	JoAnne Naka
1335	Sharon I.
1336	L. Hawkes
1337	Jullie Tuttle
1338	Ros Barry
1339	Cheryl Petrucelli
1340	Kevin Brown
1341	Richard Rudshagen
1342	Gerri Yarborough
1343	J. Myatt
1344	Dawson J.
1345	Michael Lituin
1346	Judith Shoemaker
1347	Don White
1348	Wilmes LLC
1349	Priscilla Sena
1350	Scott Tan
1351	Laurie Lehmer
1352	John & Emeli Anagnost
1353	Susan Gibson
1354	Anonymous
1355	Terrian Ferren
1356	D. Weirick
1357	Concerned Citizen
1358	Ray K

Submission	Name[1]
1359	Michael Mitani
1360	Richard Beaver
1361	Anonymous
1362	Sudduth
1363	F. Ron
1364	Anonymous
1365	Richard Foryell
1366	Charles Bauman
1367	F. Blaek
1368	Barry Buth
1369	Shirley Mitchell
1370	Vicki Smith
1371	Mrs. David C. Dupuls
1372	Karen Robinson
1373	Rick & Lori Kamrath
1374	Member of Madrone Homeowner Assoc.
1375	Vicke Wallace
1376	Kathleen Kenny
1377	J. Armandores
1378	Anonymous
1379	Anonymous
1380	Anonymous
1381	James Lews
1382	Anonymous
1383	Ernest Yuska
1384	Jon R.
1385	Carol Vega
1386	Leanna Smith
1387	Sharon L. Guzman
1388	Debre Cowrin
1389	David Ortiz
1390	Monica Steele
1391	M. Page, LCSW, BCD
1392	Judith Lanfried
1393	Miriam Lengle
1394	Carolyn Lewis (Trustee for Althea Boehm)
1395	Craig Stanton
1396	Sherry Roberts
1397	T. Fox
1398	Sofia

Submission	Name[1]
1399	Glass
1400	Mark and Diana
1401	Linda Mandel
1402	Paul Halpern
1403	Katherine McKinney
1404	Keith Lee
1405	Ismat Madhani
1406	Kevin Morrow
1407	Fred M. Gravett
1408	Robert Tashiro
1409	Ryan Moon
1410	Cynthia Angel
1411	Bob Habel
1412	Charlene Rhodus
1413	Michael Mahkorn
1414	Kirk Jensen
1415	Lonnie Nakasone
1416	Christian Chlup
1417	Robin Eisenberg
1418	Daniel Evans
1419	Robert Feldman
1420	Yogesh Patel
1421	Brandon Beers
1422	Lesli Curry
1423	Shatiana Bedgood
1424	Dave Sato
1425	Gary Hawkins
1426	Simon Hsu
1427	Michael McGee
1428	Wayne Chen
1429	K. Sinn
1430	Adair Johnson
1431	Walt Lapovich
1432	Rajakumar Ganesan
1433	Angeline Diana Velu
1434	Tim Mochizuki
1435	Roxanne Morrison
1436	Nick Morrison
1437	Sandy Kast
1438	Sam Lee

Submission	Name[1]
1439	Erika Magana
1440	Ronald Cline
1441	Christopher J. Spitzer
1442	Janet Closs
1443	Dr. Eric Homier
1444	Scott Roberston
1445	Franco Macchia
1446	Anjali Bhardwaj
1447	Carol Gilles
1448	Marcus
1449	Allison Madrid
1450	Benjamin Madrid
1451	Emilio Moyers
1452	Jim Steenhoek
1453	Huali Tian and Philip Harris
1454	James Kinnings
1455	Bill Tymczyszyn
1456	Stanley Paez
1457	Stanley Paez
1458	Marilyn Rafkin
1459	Bryon Sargent
1460	Louis Lansang
1461	Michele Smith
1462	Eileen Dann
1463	Cynthia Baran
1464	Darren Bracken
1465	Cheryl Neese
1466	Ken Yang
1467	Johnny Rodriguez
1468	Grace Eze
1469	Debby Zagorin
1470	Marshall Holladay
1471	Kathryn Wathen
1472	U.A. Garred Sexton
1473	Erika Gara
1474	Norris Blake
1475	N.
1476	Victor Kiuhan
1477	Gary Sisson
1478	Cynthia Benon

Submission	Name[1]
1479	Dan
1480	Chris Jenne
1481	Steve
1482	Huong Do
1483	Kazuhiro Tominaga
1484	Don Hanson
1485	Mohammad Sarfaraz Siddiqui
1486	Dawn Ng
1487	William M. Weed
1488	Denise Weed
1489	Thomas N. Bailey
1490	Zubair
1491	Evelyn Kelly
1492	Wayne Nakatsu
1493	Ron Kawasaki
1494	Isabel Balboa
1495	Lee Huniu
1496	Derrick Yamauchi
1497	Diana Yamauchi
1498	Gary Motowaki
1499	Michael Hikido
1500	Jaycob
1501	John V. Shaw
1502	Cecelia Ruiz
1503	Lauren Lopez
1504	Barbara Asada
1505	Todd Zylman
1506	Dweejal Torado
1507	Dorota Wiercinska
1508	Sean O'Connell
1509	Linh Tu
1510	Judy Chai
1511	Pei Shao
1512	Traci Barr
1513	Michael Van Dyke
1514	Amber
1515	Benjamin
1516	Anna Silhavy
1517	Mika Yukimura
1518	Mauricio Padillo

Submission	Name[1]
1519	Sandhya Pathak
1520	Monique Sharf
1521	Nicole Cerveaux
1522	Ray Licon
1523	John Alter
1524	Chris Alter
1525	Myra Masuyama
1526	Sylvia Wagner
1527	Tina Wu
1528	Nancy Carr
1529	Natalie Brecher
1530	Sandeep Pangala
1531	Gina Gualtiere
1532	Russel Lear
1533	Michael Hering
1534	Nicholas M. Garcia
1535	Clifford Yamamato
1536	Kathy Yandell
1537	Vicki Momary
1538	Michael Bawolski
1539	Bob D. Turnball
1540	Fred Deninger
1541	David W. Tressel
1542	Marsha Kraus
1543	Cyndi & Michael Runyan
1544	Jeffery Ly
1545	Karyn Campbell
1546	Michael Navarrete
1547	Onofre Ramirez
1548	John
1549	Kristina Nakao
1550	Jean Garcia-Gomez
1551	Ingrid Aquino-Gomez
1552	Christopher Olsen
1553	Eric Loew
1554	Glenn Murakami
1555	Dory Ann Volpe
1556	Diana
1557	Jeff Pierce
1558	Sharon Obatake

Submission	Name[1]
1559	Steve Harmon
1560	Lilian Harmon
1561	Jonathan Harmon
1562	Wendy Ito
1563	Eric McLeod
1564	Yuji Kato
1565	Eric Hambly
1566	Alexis Hambly
1567	Giselle L. Henry
1568	Alison & Michael Kasterko
1569	Gary Nakamura
1570	Robert Munoz
1571	Hakjoon Song
1572	Jongmi Kim
1573	Peter Farb
1574	Rod Royales
1575	Dena Bialick
1576	C.B.
1577	Krishna Kallury
1578	Rebecca Ward
1579	Martin Gutierrez
1580	Brian Gillman
1581	Jeff Etheringtin
1582	Angela Stark
1583	Steven Birenbaum
1584	Eileen
1585	Ryan
1586	Mark Kohagura
1587	Andrea Korntheuer
1588	Dori
1589	Michael Powe & Barbara Dyer
1590	Kelly L. Dewing Wedel
1591	Fernando
1592	Jafet Rosado De Van
1593	Carolina Olaya
1594	Maria Brown
1595	Steven Rosales
1596	Kevin Knapp
1597	Michele Starkey
1598	Jackie

Submission	Name[1]
1599	Paul
1600	Kathleen Franczak
1601	Jenny Lee
1602	Nitin Dua
1603	Nolan Miya
1604	Thomas W. Broyles
1605	Nes Banta
1606	Michael Flynn
1607	Adam Reed
1608	Brandon Foster
1609	Matthew Lin
1610	Steven Deuel
1611	Kyle Richardson
1612	Donald Isozaki
1613	Jon Roberston
1614	Garrick McLaughlin
1615	Ron Carroll
1616	Al Stahl
1617	Mark Kimura
1618	Lia
1619	Richard Reinhardt
1620	George Pimental
1621	James Hallman
1622	Annette Porter
1623	Patrick Porter
1624	Robert Suyehara
1625	Norig B. Karakashian
1626	James Thistle
1627	Sandra Radford
1628	Madu Chanani
1629	Katerina Yu
1630	Adeline Chappell
1631	Ben Gunter
1632	Yacgley Valdes
1633	Current Resident
1634	Seema S. Turner
1635	Amy
1636	Kimberly Wimmer
1637	Joel Carlson
1638	Drew Hettinger

Submission	Name[1]
1639	Marlena Allen
1640	Lisa DiFranco
1641	J. Imai
1642	Max Huang
1643	Andrew Zakim
1644	Daivid Gutierrez
1645	Geri Harmon
1646	Tanya Sue Cyre
1647	Sarah Huante-Bimat
1648	Ed Tobias
1649	Jan Tobias
1650	Isabel Torres
1651	Paul Hutchins
1652	John Phillip Van Deusen
1653	Karne Holley
1654	Lisa Li
1655	Lois & Ron Jones
1656	Phil Hong
1657	Randy Garrett
1658	Maya Yanez
1659	Judith Gerber
1660	Michael and Nancy Bergan
1661	Richard Leroy Lujan
1662	Stephanie Seki
1663	Andrew Maxwell
1664	Leah Glavan
1665	Jawad Jilani
1666	Nancy Gutierrez
1667	Priza Castro
1668	Christos Sbarounis
1669	Jonathan Turcios
1670	Sumit Kalra
1671	Deborah Wearn
1672	Mitch Koch
1673	Steve Dillow
1674	DarLynn Nemitz
1675	Jay Kim
1676	Erik Aguillon
1677	Scott Fukuda
1678	Connie Noehren

Submission	Name[1]
1679	Libra Washington
1680	Lily Lau
1681	Ana Sorto
1682	Badrinath Ramamoorthy
1683	Yi Chen Pao
1684	Estela Lopez
1685	Alissa Pappadake
1686	Jeff Hovsepian
1687	Emanuel Rodriguez
1688	Kathy Miya
1689	Ben Nye
1690	Layne Sakamoto
1691	Jose Dennis Alabaso
1692	Molly
1693	Matthew J. Davis
1694	Jon Robertson
1695	Michelle
1696	Esther
1697	Patrick Llorens
1698	James Kotecki
1699	Mary Kotecki
1700	Karen Blanchard
1701	Miguel A. Perez
1702	Michael Guzman
1703	Fred Moseley
1704	Richard Rodriguez
1705	Maria Gordon
1706	Constance Reynolds
1707	Joseph Yamashiro
1708	Lisa Scherer
1709	Carlos Delgado
1710	Ryan Shiroma
1711	Tony & Karen Herrada
1712	Katie Pandolfo
1713	Graham DesErmia
1714	Trang Le
1715	Gianna Valenzuela
1716	Carol Erickson
1717	Brad Aniya
1718	Yukihisa Aokusa

Submission	Name[1]
1719	Lisa Barry
1720	Eileen Jaynes
1721	Deborah Pasienski
1722	Harry Yee
1723	Mamatha Amrutham
1724	Jennifer Bullivant
1725	Edwin Rosas
1726	Maria Alarcon
1727	GN
1728	James Baker
1729	Heng Baker
1730	Brad Shimbukuro
1731	Melanie Dreike
1732	Jackie Eckland
1733	West Torrance Homeowners Association
1734	Fink Family
1735	Cori Talbot
1736	C. Henderson
1737	Gary Tani
1738	Margaret Heflinger
1739	Michael A. Serufine
1740	Donald Heflinger
1741	Dennis LoPiccolo
1742	Florence Tebbets
1743	Eric Homier
1744	Bruce Lagarte
1745	Irene Griffith
1746	Emily Durbin
1747	Carol Booser
1748	Gary Maclean
1749	Pam Combar
1750	Harumi Nishikan
1751	Douglass Coreas
1752	Tom O'Neill
1753	Janet Sue
1754	Patricia Carlini
1755	The Browns
1756	Franco & Kim Reitz
1757	Geoffrey M. Helfer
1758	Ophelia Biomort

Submission	Name[1]
1759	Frank Kraus
1760	Jerry Morrison
1761	Seok Jong Lim
1762	Juno & Ethel Uyematsu
1763	Louis V Martel
1764	Alan Sarkisian
1765	Dana LaRoche
1766	William Nichols
1767	Steven Sack
1768	Eric Orchard
1769	Lisa Loewner
1770	Merry Passage
1771	Chuck Salisbury
1772	David Burrows
1773	K. Nelson
1774	Joe & Mary
1775	Camillia Lee
1776	B. O'Brien
1777	Lisa Pedion
1778	Kathy
1779	James Cook
1780	Nancy Fengler
1781	H. & J. Taga
1782	Susan Ludwig
1783	Anonymous
1784	Geoff Guerrero
1785	Christine Brenk
1786	Michael Brenk
1787	Madison Brenk
1788	Diana L. Seyb
1789	Michael Brenk
1790	Jane Readeur
1791	Thomas Penland
1792	Timothy Cunningham
1793	Ted Potcovaru
1794	Eric Caro
1795	Allen Perlstein and James Goodrich
1796	William Champlin
1797	Victoria Fox
1798	James Vaughan

Submission	Name[1]
1799	Henry Martinez
1800	Mike Madrigal
1801	David Sanders
1802	Margaret Kline
1803	Sue Walters
1804	Kelly Wu
1805	Eva Wuertz
1806	Kurt Michel
1807	Jose Dennis Alabaso
1808	Lisa Whitfield
1809	Sandra Schreyer
1810	Han Wen Tsao
1811	Dan Croituro
1812	Tana Rice
1813	Grace Weltman
1814	Nancy Wilcox
1815	Milton Aineruhanga
1816	Marco
1817	Stefan Eckland
1818	David DeWitt
1819	Masaru Iwanaga
1820	Susan Eriksen
1821	Leslie Chavez
1822	Sandra Yoshioka
1823	Patty Zaremski
1824	Cristian Guerrero
1825	Kent Oliver
1826	Brad M.
1827	Wolfgang Fengler
1828	Bexsi Fujiwara
1829	Linda & David Ortega
1830	Karl D. Albert
1831	Adrianne Luther
1832	Brenden Baltimore
1833	Mr. James T. Wright
1834	Christopher J. Pon
1835	Anonymous
1836	Robin Solomon
1837	Mr. Richard Smisek
1838	N. Maloney

Submission	Name[1]
1839	Luis Garcia
1840	Irene Brucks
1841	Marianne Moscynski
1842	Jane K. Hashimoto
1843	George Williams
1844	Bill Sorosky
1845	Joseph Palsulich
1846	Sung J. Hong
1847	Linda Zelk
1848	Kathy H. Ujiiye
1849	Anonymous
1850	Anonymous
1851	Keith
1852	Mr. & Mrs. William B. Campbell
1853	Jaclynn Miller Madoni
1854	Jennifer Silver
1855	Judy & Bob June
1856	Carol Campbell
1857	Mary Hileman
1858	Patricia Westfahl
1859	Zlatan Sehovic
1860	Nancy Brock
1861	Maureen Wilson
1862	Mrs. Dana Chambers
1863	Keiko Kono
1864	Genie Valdez
1865	Randy Degasperin
1866	Kristen Papac
1867	Celia Caampued
1868	Gary E. Kaloostian
1869	Harry A. Bellows III
1870	Michael Goguen
1871	Maurine Swilley
1872	Harold Jason
1873	Samuel Gnerre
1874	Anonymous
1875	Carol Halfabe
1876	John Warren
1877	David Oster
1878	Bill & Fran Arrowsmith

Submission	Name[1]
1879	Linda Jung
1880	Beverly A. Borton
1881	Danelle Berch
1882	Fazlo Ebder
1883	Randy & JoanAnn Hart
1884	Kerry Croucer
1885	Sam Marteland
1886	Joann & Mike Tripp
1887	Gail Serrano Vasquez
1888	Mr. Gary McKenzie
1889	Chris Tam
1890	Arelen Dubas
1891	Kit Chan
1892	Tomi Kawasaki
1893	Leonard Zak
1894	Denny Hallmark
1895	Peter Gregoris
1896	Michele Urbina
1897	Shoreh Zareh
1898	Ann Clark
1899	Heather Albright
1900	X
1901	Hanif Haji
1902	Oluyinka Sorunke
1903	John Usui
1904	Robert Jung
1905	Brandon Folkman
1906	Samanth Folkman
1907	Ralph
1908	Christine Tokunaga
1909	Cynthia Kringen
1910	Isaac Ng
1911	Mahesh Tyagi
1912	Rajani Patel
1913	Vinh Cam
1914	Lori Bowker
1915	Daniel Bowker
1916	Elle Tran
1917	Cynthia A. Lim
1918	Sam

Submission	Name[1]
1919	Rachel LaCoe
1920	Melissa Brymer
1921	Potato Jim
1922	Frank Putz
1923	B. Stacy
1924	Rebecca Poirier
1925	Marian Eskander
1926	Linda Holliday
1927	Cheng-Wen Huang
1928	Jenifer Roberts
1929	Lauren Faith Niro
1930	Linda Hurnbeck
1931	John Carter
1932	Frank Yanai
1933	James C. Reidy
1934	Lilia Lucero
1935	Sally Matsumoto
1936	Gus Mesch
1937	Thomas & Cheryl Lenahan
1938	Douglas Lowder
1939	Dorcas Huang
1940	Richard Astin
1941	R. Parke
1942	Mr. Kenneth F. Darr
1943	Bryan Griebenow
1944	Bruce Pettingale
1945	Patrick Healy
1946	Mark Nelson
1947	Holly Osborne
1948	Jennifer L. Dodge
1949	Ray Hollar
1950	Ray Hollar
1951	Margie Alexander
1952	Janice Tanabe
1953	Monique Negrete-Mitchell
1954	Gianna Mitchell
1955	Jan Kurth
1956	Marie Puterbaugh
1957	Maria Savage
1959	Mike

Submission	Name[1]
1960	Ray Hollar
1961	Kylee Kirby-Smith
1962	Janice Tanabe
1963	Colleen Villegas
1964	Armando Vicente
1965	Ana Maria Houck
1966	Sirley Cuevas
1968	Nancy Skiba
1969	Mike Kim
1970	Mark Nelson
1971	Jiri Samuel
1972	Jiri Samuel
1973	Jan Kurth
1974	Michael Cowan
1975	Kelly F.
1976	Jay Gould
1977	Jay Gould
1978	Mark Car
1979	Stable
1980	Teresita Gonzales
1981	Lyuamila Gurevich
1982	Anne and Steve Granick
1983	Ralph Giordano
1984	Ricardo Gonzalez
1985	R. Yanase
1986	Ana Sofia Chappeton
1987	Grant Glazebrook
1988	Jason MacDonald
1989	Anonymous
1991	Holly Osborne

[1]Some names and comments were transcribed from handwriting using the transcriber's best judgment and corrected by Metro in the responses to comments when known to be incorrect.

Table 5.1-4: Comments Received During Draft EIR Comment Period Public Hearings

Submission	Name[1]
PH1	Armando Vicente
PH2	Josh Standifer
PH3	Craig St. John
PH4	Kevin Mitchell
PH5	John Schreiber
PH6	Chelsea Schreiber
PH7	Lena Pullen
PH8	Eric Hermelin
PH9	Barry Ogle
PH10	Angelica Vicente
PH11	Rhonda Hofmann Gorman
PH12	Ted Hofmann
PH13	Doris Hofmann
PH14	Robert Pullen Miles
PH15	Pat Nichols
PH16	Denise
PH17	Andrew Wang
PH18	Rick Gould
PH19	Josh Standifer
PH20	Maria Francis
PH21	Marvin Francis
PH22	Tom Wooge
PH23	Fred Sadegh
PH24	Abby Sahjari
PH25	Kehla Guirguis
PH26	Safah Guirguis
PH27	Lena Pullen
PH28	Angelica Vicente
PH29	Armando Vicente
PH30	Brandon Vickers
PH31	Sean Moore
PH32	Jonathan Shultz
PH33	George Gale
PH34	Raul Moratto
PH35	Ted Hofmann
PH36	Amy Lacoe
PH37	Kim
PH38	Marianna Carlton
PH39	Mike Gallin

Submission	Name[1]
PH40	Ray Hollar
PH41	Ted Hofmann
PH42	Lama Barikhan
PH43	Samsung
PH44	Lama Barikhan
PH45	Kim
PH46	Mike Gallin
PH47	Becky Sitton
PH48	Nancy Cline
PH49	Kim
PH50	Rupesh
PH51	Ted Hofmann
PH52	Kim
PH53	Rupesh
PH54	Ted Hofmann
PH55	Kevin McKenzie
PH56	Ray Hollar
PH57	Amy Lacoe
PH58	Traber Schroeder
PH59	Pam Combar
PH60	Nathan Koller
PH61	Bill Lingar
PH62	Kimberly Gillen
PH63	Aram Chaparyan
PH64	Robin Willinis
PH65	Michael Kim
PH66	Ted Hofmann
PH67	James Eckland
PH68	George Gillen
PH69	Patti Giglio
PH70	Bettina Osten
PH71	Milan Matsumoto
PH72	Robert Acherman
PH73	Thomas Dorsey
PH74	Kyle Brubaker
PH75	Massima Darom
PH76	Paul Miller
PH77	Michelle Bonnee
PH78	Monica Sweet
PH79	Kim Turner

Submission	Name[1]
PH80	Holly Osborne
PH81	Ray Hollar
PH82	Ted Hofmann
PH83	John Schreiber
PH84	Donald Szerlip
PH85	Jennifer Dodge
PH86	George Gillen
PH87	Erik Ore
PH88	Kimberly Gillen
PH89	David Zappacosta
PH90	Kevin Mitchell
PH91	Niki Negrete-Mitchell
PH92	Candice Nafissi
PH93	Michelle Lopez
PH94	Cindy Lederman
PH95	Lucas Love
PH96	Mike Garland
PH97	Colleen Villegas
PH98	Michael Kim
PH99	Paige Kaluderovic
PH100	Jill Love
PH101	Jerome Chang
PH102	Ted Hofmann
PH103	Bob Pinzlon
PH104	Julie Iffland
PH105	John Hough
PH106	G. P. Sudduth
PH107	Niki Negrete-Mitchell
PH108	Holly Osborne
PH109	Lara Duke
PH110	Jan Kurth
PH111	Shelby Michael
PH112	Kimberly
PH113	Holly Osborne
PH114	Chelsea Schreiber
PH115	Zein Obagi
PH116	Kim Binegar
PH117	Mark Cole
PH118	Kimberly
PH119	Kim Turner

Submission	Name[1]
PH120	Massima Daroui
PH121	Doug Boswell
PH122	Ray Hollar
PH123	Niki Negrete-Mitchell
PH124	Jennifer Dodge
PH125	Zein Obagi
PH126	Doug Boswell
PH127	Mary Smiley
PH128	Ray Hollar
PH129	Corey Cardinal
PH130	Lisa Francis
PH131	Ted Hofmann
PH132	Doris Hofmann
PH133	Michael Kim
PH134	Glen Brackenridge
PH135	Sirley Cuevas
PH136	Laura Thomas
PH137	John Richards
PH138	Holly Osborne
PH139	Ted Hofmann
PH140	G. P. Sudduth
PH141	John Schreiber
PH142	Catherine Boll
PH143	John Richards
PH144	Joanne Doram
PH145	Corey Cardinal
PH146	Massima Daroui
PH147	Terri Thomas
PH148	Craig St. John
PH149	Holly Osborne
PH150	Rose Rodriguez
PH151	Ray Hollar
PH152	G. P. Sudduth
PH153	Michael Kim
PH154	Doris Hofmann
PH155	Rose Rodriguez
PH156	Mary Smiley
PH157	Lisa Francis
PH158	Bernadette Suarez
PH159	Sean Moore

Submission	Name[1]
PH160	Pat Kearny
PH161	John Richards
PH162	Rose Rodriguez
PH163	Ted Hofmann

[1] Names and comments were transcribed by a professional court reporter; names were spelled using the transcriber's best judgment and corrected by Metro in the responses to comments when known to be incorrect.

5.2 MAJOR TOPICS RESPONSES

Several comments received on the Draft EIR addressed the same key topic areas and raised recurring themes. To provide a robust response to these frequently raised topics, major topic responses are provided here. While some of the topics discussed are not environmental topics under CEQA, they are covered here for informational purposes.

5.2-1 MR-1: Selection of Alternatives

Previous Planning Studies

Metro has been exploring options for transit service along the Metro-owned right-of-way (ROW) for several decades. Metro purchased the Harbor Subdivision from the precursor to the Burlington Northern Santa Fe Railway (BNSF) in the early 1990s. In 2009, Metro prepared an alternatives analysis that studied the potential for transit service along all or portions of the Metro ROW and identified the segment between the Redondo Beach (Marine) Station and the Torrance Transit Center as the highest priority project. Since then, several alignments and alternatives have been studied. The 2018 Supplemental Alternatives Analysis Report recommended two alignments to be carried forward into environmental analysis: the Metro ROW and the Hawthorne Boulevard alignments.

Draft EIR

After public scoping in 2021, an additional trench alignment option along the Metro ROW was added to the environmental study and included in the Draft Environmental Impact Report (EIR), in response to community input. The Draft EIR analyzed the Proposed Project, which is an Elevated/At-Grade Alignment within the Metro ROW, as well as a Trench Option and Hawthorne Option for the segment north of 190th Street. South of 190th Street, all alignments are the same and terminate at the Torrance Transit Center. In accordance with CEQA, the Draft EIR also analyzes a reasonable range of CEQA alternatives, including a No Project Alternative and two potentially feasible build alternatives – the High Frequency Bus Alternative and the 170th/182nd Grade-Separated Light Rail Transit Alternative – which were developed to substantially lessen or avoid significant project-related impacts, while still meeting most of the project's basic objectives.

Engagement & Community Input

Metro's commitment to meaningful community engagement has been central to the development of the project and to the process of shaping staff recommendations for the Locally Preferred Alternative (LPA). Metro has conducted extensive community engagement, both in person and virtually, throughout the environmental review process. Efforts to share information about the project included videos, interactive websites, and public meetings and briefings. Metro also actively gathered local feedback by conducting neighborhood walks and transit rider intercepts, listening to concerns, and responding to questions. All feedback was documented for transparency, and summary reports are available on Metro's project website.

Through these discussions, Metro staff found that attendees placed significant emphasis on protecting greenspace, ensuring safety for children and families walking and cycling in neighborhoods, and supporting greater access to economic development within the South Bay. The feedback from this engagement demonstrated strong community support for a rail extension to Torrance.

Public comments on the Draft EIR raised several key concerns, including noise from light rail trains and equipment near homes, safety concerns related to light rail trains crossing streets where residents – particularly school children – walk, potential delays to emergency responders caused by at-grade light rail crossings, and noise, vibration, and safety concerns regarding shifting existing freight tracks closer to

homes, including Breakwater Village, a senior living community adjacent to the Metro ROW. In addition to input from local residents, Metro received a recommendation from the California Public Utilities Commission (CPUC), which is a Responsible Agency for the project.[1] The CPUC recommended that Metro grade separate 170th and 182nd Streets due to the increased frequency of train activity at the two proposed light rail crossings and their close proximity to elementary schools within residential neighborhoods.

Selection of the LPA

Based on this extensive public engagement and input, Metro staff recommended that the Metro Board of Directors (Metro Board) select the 170th/182nd Grade-Separated Light Rail Transit Alternative, also referred to as the "Hybrid Alternative," as the LPA. At the May 23, 2024 Regular Board Meeting, the Metro Board adopted staff's recommendation and selected the Hybrid Alternative as the LPA. Being identified as the LPA means that the design of the Hybrid Alternative has been refined and advanced in the Final EIR. However, the other options and alternatives studied in the Draft EIR remain under consideration, and the final decision on the project will not be made until after the Final EIR is issued and the Metro Board holds a final public meeting on whether to certify the Final EIR and approve the project, including any of the options or alternatives evaluated in the EIR.

Responding to Community Concerns

The LPA addresses many of the public's concerns by eliminating the two at-grade light rail crossings by placing the light rail tracks below grade at 170th Street and 182nd Street. This, in turn, eliminates the Elevated/At-Grade Alignment's potentially significant and unavoidable noise impact caused by light rail crossing gate bells. It also avoids any potential for delays to emergency responders and prevents conflicts between light rail trains and pedestrians and cyclists, including along school routes. The LPA also avoids the construction-related significant impact to air quality generated by the Trench Option, which, if constructed, would require extensive excavation and truck hauling to remove soils. For the LPA, trench excavation would be limited to the two areas where short trenches would be constructed to grade separate 170th and 182nd Street. Relative to the Elevated/At-Grade Alignment, the LPA also eliminates the need to build a new freight bridge over Grant Avenue and avoids shifting the existing freight track closer to homes south of Artesia Boulevard, including Breakwater Village.

Similar to the Elevated/At-Grade Alignment and the Trench Option, construction of the LPA would be largely confined to the Metro ROW, which minimizes the real estate acquisitions needed to construct and operate the project north of 190th Street associated with the Hawthorne Option. The LPA identifies up to four non-residential parcels as permanent full acquisitions to locate Traction Power Substations (TPSS). Like the other alignments studied in the Draft EIR, the LPA is designed to avoid displacement of residents. The LPA would result in a construction duration approximately one year longer compared to the Elevated/At-Grade Alignment, but the overall construction duration would be within the five-to-seven year construction schedule range described in the Draft EIR.

The LPA is projected to attract about 4,690 new riders and 11,500 total daily project trips by 2042 (which also applies to the Elevated/At-Grade Alignment and Trench Option). Further, the LPA's projected cost of $2.23 billion (as estimated in 2022) is significantly lower ($730 million less) than that of the Hawthorne Option. For more information, see MR-21: Cost Estimates and Schedule.

[1] Under CEQA, a "Responsible Agency" is any public agency, other than the Lead Agency, that has discretionary approval power over a portion of the project (CEQA Guidelines Section 15381).

Challenges Related to Hawthorne Option

As noted in the May 23, 2024 Metro Board Report,[2] where the Metro Board voted to select the LPA, the Hawthorne Option presents several challenges for construction and implementation. It would require encroachment into Caltrans ROW and additional federal environmental clearance under the National Environmental Policy Act (NEPA), which could extend the project schedule by two to four years. Construction along Hawthorne Boulevard, which is a major regional thoroughfare with approximately 70,000 daily trips, would include lane closures and parking loss, which would exacerbate existing traffic congestion locally and across the South Bay during an extended five-to-seven-year construction period.

Approximately 170 commercial properties abut the Hawthorne Option, which serve approximately 350 businesses. The Hawthorne Option would require the greatest number of property acquisitions and result in the highest number of business displacements among the options studied. As identified in the 2023 Real Estate Acquisitions Report[3], the Hawthorne Option would require permanent full acquisition of seven commercial parcels and permanent partial acquisition of five commercial parcels north of 190th Street. Major utility relocations would also be required, including relocation of a major underground storm drain located beneath Hawthorne Boulevard, which would require lane closures to construct. In addition, the Hawthorne Option would require the high-voltage overhead transmission lines that traverse the corridor to be raised, to provide the required safety clearance between the wires and light rail system. These factors contribute to the Hawthorne Option's estimated construction cost of $2.96 billion (as estimated in 2022), the highest of the alignment options studied.

Further, the Hawthorne Option would not include enhancements proposed along the existing Metro ROW, such as freight noise, vibration, and safety enhancements, or the new neighborhood multi-use paths in Lawndale and Redondo Beach. It would also not provide a direct connection to the new Redondo Beach Transit Center, located a half-mile away. By contrast, the LPA provides a more balanced and cost-effective solution that still meets the project's objectives, ridership goals, and community and environmental priorities.

5.2-2 MR-2: Operational Noise Analysis Methodology and Impact Thresholds

The noise impact analyses were conducted in accordance with the Federal Transit Administration's (FTA) 2018 *Transit Noise and Vibration Impact Assessment Manual* (FTA Manual). This guidance is specifically designed to assess changes in noise conditions resulting from transit projects. The FTA Manual provides a comprehensive methodology to evaluate potential noise and vibration impacts from light rail operations, station activities, special trackwork, relocated freight tracks, grade crossings, and traction power substations. It also includes specific procedures for assessing daytime and nighttime noise at residences and other noise-sensitive locations. A full discussion of the noise methodology is included in Section 3.6-2.2 of the Draft EIR.

The following summarizes the key steps taken in identifying noise-sensitive land uses, measuring existing noise levels, and modeling the potential noise generated by the alignment options for the project. The noise levels are then assessed against the FTA noise impact thresholds to determine impacts.

[2] The relevant Board Report for the May 23, 2024 Metro Board Meeting is available at: https://metro.legistar.com/LegislationDetail.aspx?ID=6699075&GUID=B590F488-8363-4FE1-A9F2-93D0EB80DFEF&Options=&Search= (accessed October 31, 2024).

[3] The Real Estate Acquisitions Report (2023d) is available in the "Project Filing Cabinet" on Metro's website for the C Line Extension to Torrance: C Line Extension to Torrance - LA Metro

Identifying Sensitive Uses

All sensitive land uses (such as residences, schools, and parks) were identified within the FTA screening distances (350 feet from the alignment centerline for operation). The sensitive uses were grouped into modeling clusters for analysis, based on factors such as proximity to the alignment, existing noise conditions, and light rail system operating parameters (e.g., trackwork and light rail speed). Each cluster represents a group of land uses that have similar existing noise levels and would experience similar project-generated noise levels. Distances were measured from the nearest sensitive land use within each cluster to ensure that potential noise impacts were assessed conservatively. This approach accounts for the nearest and most affected receptors, providing a reasonable worst-case scenario for the analysis. Additional discussion of this identification process is provided on page 3.6-18 of the Draft EIR.

Establishing Existing Noise Levels

The Draft EIR measured existing noise levels and accounted for all existing sources of ambient noise using the methods outlined in the FTA Manual. Noise levels were recorded through 24-hour noise monitoring, capturing both daytime and nighttime ambient noise, as well as shorter, 1-hour representative measurements during the day. The monitoring was designed to account for all existing noise sources, including roadway traffic, aircraft flyovers, and freight activity. Monitoring locations were carefully selected to best represent existing conditions at sensitive receptors along the proposed alignments.

Noise was monitored at 27 locations, including daytime 30-minute measurements (1-hour representative) for FTA category 3 receptors (daytime institutional uses) and continuous 24-hour monitoring for FTA category 2 receptors (places where people sleep). To account for increased sensitivity to nighttime noise, a 10-dBA penalty was applied to all sound that occurred between 10:00 p.m. to 7:00 a.m. In the 24-hour noise calculation, the effect of the penalty is that each nighttime event is treated as equivalent to 10 daytime events. Further discussion of the existing noise methodology is included on page 3.6-17 of the Draft EIR. A discussion of the existing noise conditions, along with tables with monitored noise levels, and mapped noise monitoring locations, are included on pages 3.6-22 through 3.6-27 of the Draft EIR.

Modeling Project-Generated Operational Noise

The operational noise levels generated by the project options were modeled based on the frequency of service during different times of day, and the proximity of sensitive receptors from the alignment centerline. This modeling accounted for both light rail operations and freight operations on the relocated tracks. The freight operations on the relocated tracks were assumed to be the same as the freight's existing schedule. During nighttime hours, additional weighting, or a "penalty," was applied to noise levels to reflect increased sensitivity to noise during those hours.

Impact Thresholds for Operational Noise

Metro, as the CEQA lead agency, is responsible for selecting the appropriate significance criteria for the project and has chosen to apply the FTA's noise impact criteria. These criteria were specifically developed to address transit-related noise and are based on extensive research on human response to community noise. The FTA operational noise criteria consider both the change from the existing noise conditions and the extent to which noise generated by a project could result in noticeable changes in the ambient noise environment. The existing ambient noise levels serve as the baseline for determining moderate and severe impact criteria, defining the level of noise increase that would be considered moderate or severe. These criteria, including their relationship to ambient noise levels, are illustrated in

Figure 3.6-2 of the Draft EIR. If noise impacts are classified as either "moderate" or "severe" under the FTA criteria, the Draft EIR considers the impact to be "significant" under CEQA. Mitigation is required for all such significant impacts.

This approach contrasts with the "brightline" operational noise thresholds used by many local jurisdictions, which set fixed operational limits without considering existing noise levels. In many cases, these city thresholds have already been exceeded by existing conditions. The FTA's criteria, by comparison, account for existing noise conditions and help ensure that any noticeable increase is properly evaluated.

5.2-3 MR-3: Operational Noise Project Features and Mitigation Measures

In response to comments and to reflect changes in design made since circulation of the Draft EIR, the Final EIR includes refined mitigation measures to reduce potentially significant noise effects. In addition, Chapter 4, Corrections and Additions, of the Final EIR includes a detailed noise analysis for operation of the LPA, which grade separates the light rail tracks by eliminating the two at-grade crossings (at 170th Street and 182nd Street) that are included in the Elevated/At-Grade Alignment. Under the LPA, the light rail would cross below 170th and 182nd Streets in two short trenches, eliminating the need for light rail crossing gates and bells near homes.

The project design for the Metro ROW alignments includes project feature PF-NV-1 (Quiet Zone Equipment Installation), which applies to the design of the at-grade freight crossings. In addition, the Elevated/At-Grade Alignment – the only alignment with at-grade light rail crossing – includes project features PF-NV-2 (Crossing Bell Shrouds) and PF-NV-3 (Gate-Down-Bell-Stop Variance), which apply to the two proposed at-grade light rail crossings. These project features are described in Section 3.6-2.5 on pages 3.6-21 and 3.6-22 of the Draft EIR. The Draft EIR also recommends several mitigation measures to reduce the project's potentially significant noise impacts, as identified in Section 3.6-5 on pages 3.6-96 through 3.6-99 of the Draft EIR. The following summarizes the project features and mitigation measures.

Summary of Project Features (see Draft EIR Section 3.6-2.5 on pages 3.6-21 and 3.6-22 for full text)

- PF-NV-1 (Quiet Zone Equipment Installation): The eight at-grade freight crossings along the Metro ROW between Inglewood Avenue and 182nd Street would be designed and constructed to include Federal Railroad Agency (FRA)-required Supplemental Safety Measures and associated improvements and equipment that are needed to qualify for Automatic FRA Approval to establish a quiet zone. Crossing signal bells for freight would also be set to the minimum noise level of 75 dBA at 10 feet per American Railway Engineering and Maintenance-of-Way Association (AREMA) requirements. A quiet zone is a section of the rail corridor where train horns are not routinely sounded at crossings, provided that safety measures, such as gates, lights, and other barriers, are in place to protect motorists and pedestrians. The establishment of this quiet zone is anticipated to reduce freight noise overall along the corridor, as freight train horns typically produce noise levels of up to 110 dBA.
- PF-NV-2 (Crossing Signal Bell Shroud): For the Elevated/At-Grade Alignment, crossing signal bells at the two at-grade light rail crossings (170th Street and 182nd Street) would be equipped with shrouds to direct bell noise away from sensitive receivers and towards the crossings.
- PF-NV-3 (Gate-Down-Bell-Stop Variance): Also for the Elevated/At-Grade Alignment, Metro would apply for a gate-down-bell-stop variance at the two at-grade light rail crossings (170th Street and 182nd Street) to reduce the duration of bell ringing, limiting crossing signal noise to no more than 30 seconds.

Together, these project features are designed to minimize horn and bell-related noises near at-grade crossings. PF-NV-1 (Quiet Zone Equipment Installation) supports the seamless implementation of a quiet zone by the cities of Lawndale, Redondo Beach, and Torrance. It does not require discretionary action from the CPUC. PF-NV-2 (Crossing Signal Bell Shroud) and PF-NV-3 (Gate-Down-Bell-Stop Variance) would require CPUC coordination and approval, but based on Metro's past experience with CPUC on similar light rail transit projects, CPUC approval is anticipated, should the Metro Board approve the Elevated/At-Grade Alignment for implementation.

Summary of Operational Mitigation Measures (see Draft EIR Section 3.6-5, pages 3.6-96 through 3.6-99 for full text)

- MM-NOI-2 (Soundwalls): To mitigate operational noise impacts, the project would install soundwalls at identified impacted receptors. This would reduce noise by blocking the path of travel of noise from the light rail transit vehicle to sensitive receptors. The locations of the proposed soundwalls are shown in the Draft EIR, which include: pages 3.6-51 to 3.6-53 for the Elevated/At-Grade Alignment, pages 3.6-55 to 3.6-57 for the Trench Option, and pages 3.6-78 to 3.6-80 for the Hawthorne Option. The locations of the LPA soundwalls are shown in pages 4-115 to 4-119 of this Final EIR and are consistent with either the Elevated/At-Grade Alignment or Trench Option, depending on the alignment configuration at the given location.
- MM-NOI-3 (Low-Impact Frogs): Low-impact frogs would be installed at light rail crossovers identified as contributing to noise impacts. Frogs are specialized track components located where rails intersect or change direction within a crossover. Traditional frogs, which allow train wheels to pass from one rail to another, have gaps that produce a loud "clickety-clack" noise and cause vibration when train wheels pass over them. Low-impact frogs incorporate mechanisms, such as spring-loaded devices, to close these gaps as the train passes, significantly reducing noise and vibration.
- MM-NOI-4 (Quiet Zone Establishment for the Metro ROW alignments): Metro would cooperate with the cities of Lawndale, Redondo Beach, and Torrance to establish a quiet zone(s) along the Metro ROW from north of Inglewood Avenue to south of 182nd Street. As noted, the establishment of this quiet zone is anticipated to reduce freight noise overall along the corridor, as freight train horns typically produce noise levels of up to 110 dBA.
- MM-NOI-5 (Wheel Squeal Noise Monitoring for the Hawthorne Option): Wheel squeal is a high-pitched noise caused by friction between train wheels and rails on tight curves. This mitigation measure requires Metro to conduct noise monitoring at curves with a radius of less than 1,000 feet near sensitive receptors, which only occurs along the Hawthorne Option (there are no light rail and freight curves with a radius of less than 1,000 feet along the Metro ROW alignments). If the monitoring detects wheel squeal, Metro shall use wayside rail lubrication as necessary to reduce friction and prevent the noise from occurring. Note that this mitigation measure is only applicable to the Hawthorne Option because only that option has curve radii tight enough to cause wheel squeal.

Summary of Potential Impacts After Mitigation and With or Without the Project Features

With implementation of the above-described mitigation measures, including the implementation of a quiet zone, operational noise impacts of the LPA, Trench Option, and the Hawthorne Option would be reduced to less than significant levels. For the LPA and Trench Option, this includes the combined freight and light rail noise. For the Elevated/At-Grade Alignment, residual significant impacts would remain at some sensitive receptors, as shown in Figure 3.6-21 through Figure 3.6-24, and described in Section 3.6-6.1.2 on pages 3.6-100 to 3.6-103 of the Draft EIR. These residual significant impacts are due to the need for audible warning devices for the at-grade crossing at 170th Street, which is in close proximity to

sensitive receptors (homes). See Section 4.21 of Chapter 4, Corrections and Additions, of the Final EIR, which includes additional details for the 170th/182nd Grade-Separated Light Rail Transit Alternative (LPA) noise analysis.

For the Metro ROW alignments, the Draft EIR also discloses the potential for noise impacts if a quiet zone (PF-NV-1) is not established and/or if the CPUC did not approve the crossing signal bell shroud (PF-NV-2) and gate-down-bell-stop variance (PF-NV-3). As shown in Table 4 on page 18 of Appendix 3.6-B (Noise Analysis Detail Appendix), if quiet zones are implemented and soundwalls (MM-NOI-2) and low-impact frogs (MM-NOI-3) are in place, but the CPUC does not approve bell shrouds or gate-down-stop project features, four clusters would exceed the FTA noise criteria under the Elevated/At-Grade Alignment. No clusters would exceed the FTA noise criteria for the Trench Option or the LPA, as those alignments feature full light rail grade separations and do not require bell warnings at two crossings.

If, however, soundwalls (MM-NOI-2) and low-impact frogs (MM-NOI-3) are implemented, but quiet zones (MM-NOI-4) are *not* established and the CPUC also does not authorize the bell shroud (PF-NV-2) and gate-down-stop (PF-NV-3), the number of clusters exceeding the FTA noise criteria would increase substantially: 98 clusters for the Elevated/At-Grade Alignment, 99 clusters for the LPA, and 95 clusters for the Trench Option.

For the Hawthorne Option, which would not share a corridor with freight and would be fully grade-separated, implementation of mitigation measures MM-NOI-2 (soundwalls), NOI-3 (low-impact frogs), and MM-NOI-5 (wheel squeal noise monitoring) would reduce operational noise impacts to less than significant.

5.2-4 MR-4: Potential Negative Health Effects Related to Noise, Vibration, and Air Quality

Some commenters expressed concerns about potential negative health effects of the project related to noise, vibration, and air quality. These topics are addressed below.

Noise

The Draft EIR includes a comprehensive analysis of noise impacts and addresses potential health effects.

With the exception of hearing damage (discussed below), there are no quantifiable standards available to form the basis for an impact assessment of noise impacts on health. However, the FTA criteria used in the Draft EIR are based on well-established research into human responses to community noise. These criteria are designed to limit exposure to levels that prevent significant interference with normal activities, such as communication and sleep, and to reduce the likelihood of long-term annoyance. While the FTA criteria are not explicitly health based, they are generally considered protective of public health because annoyance typically occurs at lower levels than those associated with physiological harm. Therefore, compliance with FTA criteria is widely regarded as sufficient to prevent adverse health effects. Where application of the FTA criteria indicates significant impacts, the Draft EIR identifies mitigation measures to reduce those impacts and further minimize any potential health risks.

It is not scientifically feasible to directly correlate project-related noise impacts with specific health outcomes, due to the wide variability in how individuals respond to noise. Factors such as age, health status, pre-existing conditions, and personal sensitivity to noise vary greatly. Scientific studies, including the ones cited by commenters, generally establish broad patterns of how long-term exposure to high levels of noise may increase the risks of stress, cardiovascular disease, or sleep disturbance, but they do not provide a direct, one-size-fits-all correlation between specific decibel levels and individual health impacts. Moreover, transit-related noise is intermittent (e.g., from train pass-bys), making it difficult or

impossible to model the cumulative effect of short bursts of noise over time as compared to continuous, high-level noise exposure found in occupational settings.

In terms of hearing loss, the Occupational Safety and Health Administration (OSHA) has established an action level of 85 dBA for continuous noise exposure over an 8-hour period to protect against hearing damage (29 CFR 1910.95). As shown in Section 3.6-4 of the Draft EIR, unmitigated noise from light rail pass-bys at speeds of 50 miles per hour, which is the maximum speed through residential areas, would be approximately 78 dBA—well below the OSHA action level. Moreover, because light rail pass-bys are brief, typically lasting less than a minute, the noise exposure would not be continuous throughout the day, further reducing the potential for any risk of hearing loss. Even during peak periods, when trains pass by every five minutes, the equivalent noise level over a 1-hour period would be approximately 63.7 dBA without mitigation. This further demonstrates that noise from train operations would not pose a risk of hearing loss. These predicted noise levels represent exterior conditions. Actual interior noise would be lower, as standard building construction typically reduces noise by 10 dB with windows open and by 20 dB with windows closed.

While it is unlikely that project-generated noise would result in hearing loss, the Draft EIR acknowledges that elevated noise levels could increase stress, disrupt sleep, and interfere with speech at affected sensitive uses (see pages 3.6-2, 3.6-48). To address noise impacts, the Draft EIR includes mitigation measures (MM-NOI-2 through MM-NOI-5) to reduce noise where feasible, such as installing soundwalls and other noise-reducing features designed to keep noise levels below FTA thresholds.

As summarized in Sections 3.6-6 and 4.5-3.6.2 of the Draft EIR, implementation of mitigation measures, including the establishment of a quiet zone, would reduce operational noise impacts as follows:

> To below the FTA criteria at all clusters for the LPA, Trench Option and Hawthorne Option.

> To below the FTA criteria at all clusters except two near 170th Street for the Elevated/At-Grade Alignment.

By reducing most of the significant operational noise impacts to below the FTA criteria, Metro's mitigation measures are likewise expected to reduce the potential for long-term noise-related health impacts.

Potential health effects related to construction noise are discussed on page 3.6-34 of the Draft EIR. OSHA and the State's Division of Occupational Safety and Health (Cal/OSHA) regulations establish permissible noise exposure limits for workers to prevent hearing loss and hearing damage, with an average allowable exposure levels of 90 dBA (Leq) over an 8-hour period (OSHA Standard 1910.95; 8 Cal. Administrative Code, Section 5096). As shown in Table 3.6-15 of the Draft EIR (page 3.6-42), hourly noise levels from the loudest construction equipment could exceed 90 dBA at a distance of 50 feet. However, this equipment would not typically operate at 100% power or in close proximity to sensitive receptors for the full 8-hour period. As a result, average daily construction noise levels would remain below occupational thresholds.

Importantly, hearing loss is primarily an occupational hazard and is not anticipated for community members temporarily exposed to elevated construction noise. In some instances, stress may increase temporarily near active construction sites. However, MM-NOI-1 (Noise Control Plan) requires Metro's contractor to prepare and implement a detailed, site-specific Noise Control Plan prior to initiating any localized construction activities. The plan must demonstrate compliance with the FTA's 1-hour Leq construction noise thresholds (90 dBA during the day and 80 dBA at night for residential areas), which are designed to minimize harmful community exposure to noise. The plan must be prepared by a board-certified acoustical engineer and approved by Metro before work begins. To ensure impacts are reduced

to the maximum extent feasible, MM-NOI-1 requires the contractor to conduct continuous noise monitoring and implement corrective actions when thresholds are exceeded. The measure also mandates the use of feasible noise-reducing construction techniques such as the use of temporary noise barriers, high-performance mufflers, and electric (rather than diesel) equipment. Impact equipment is to be minimized or replaced with quieter alternatives, and nighttime work must comply with local ordinances or obtain necessary variances demonstrating mitigation.

By requiring adherence to FTA construction noise standards, proactive monitoring, and application of best available noise-reducing technologies, MM-NOI-1 (Noise Control Plan) would reduce the potential for adverse health effects, such as stress and sleep disruptions, while ensuring construction noise impacts are mitigated to the extent feasible. Although construction noise impacts would remain significant and unavoidable under CEQA, they would be temporary, intermittent, and not a type or intensity likely to cause lasting health effects.

Vibration

Similar to noise, it is not currently feasible to directly correlate vibration impacts of the project to specific health outcomes. Existing studies of vibration-related health effects primarily focus on occupational exposures, which involve sustained, high-intensity contact with vibrating surfaces and tools over long periods. For instance, workers operating jackhammers and heavy machinery for long durations sometimes develop what is referred to as hand-arm or whole-body vibration syndrome. Studies and guidance that have documented this phenomenon as an occupational hazard include but are not limited to the National Institute for Occupational Safety and Health *Publication 83-110 Vibration Syndrome* (1983) and The Navy and Marine Corps Force Health Protection Command *Human Vibration Guide* (2023). In contrast, transit-related vibration is intermittent, typically occurs at lower levels, and does not involve direct contact with vibrating surfaces, making it difficult to apply these occupational health findings to residential or community settings. Furthermore, individual sensitivity to vibration varies widely, influenced by factors such as personal health, age, and location within a building. As a result, there is no reliable method for linking specific vibration levels to health outcomes for the general population.

The operational vibration analysis in the Draft EIR calculates vibration levels at nearby buildings using equations from the FTA Manual, which accounts for the type and speed of transit vehicle and the distance from tracks to vibration-sensitive structures. Resulting values were compared to FTA vibration impact thresholds for damage and annoyance. For residential structures exposed to high frequency train activity (more than 70 events per day), the FTA's annoyance impact threshold is 72 VdB. See Draft EIR sections 3.6-2.3 and 3.6-2.4 for more detail regarding the methodology.

Similarly, construction vibration impacts are not expected to cause direct health effects, as the types of vibration experienced near construction sites are short-term and temporary, and do not reach the intensity or duration necessary to result in conditions like those seen in occupational exposure to high-vibration equipment.

The Draft EIR concludes that vibration levels of the Hawthorne Option would not exceed the FTA vibration annoyance thresholds. With implementation of mitigation measures MM-VIB-4 (Low Impact Frogs), MM-VIB-5 (Resilient Fasteners), and MM-VIB-6 (Ballast Mats), the Elevated/At-Grade Alignment, the Trench Option, and the LPA also would not exceed the FTA annoyance thresholds. Therefore, operational vibration impacts would be less than significant and, accordingly, would not likely result in adverse health effects. The Elevated/At-Grade Alignment, the Trench Option, and the LPA would similarly not exceed the FTA annoyance thresholds. Therefore, operational vibration impacts are not expected to result in adverse health effects.

The Draft EIR concludes that construction vibration levels would exceed FTA vibration damage criteria for the Elevated/At-Grade Alignment, and the FTA vibration annoyance criteria for all of the alignments studied in the Draft EIR. However, these temporary vibration impacts are not expected to cause health effects. Construction vibration would be short-term and would not reach the intensity or duration necessary to trigger the types of known occupational health risks described above. At most, vibration could contribute to temporary annoyance or sleep disruption in sensitive individuals. However, given the limited duration and frequency of exposure, these effects would not be expected to lead to lasting health effects. Additionally, Metro would limit construction to daytime hours near sensitive uses to the extent feasible.

For these reasons, the levels and duration of vibration associated with construction and operation of the project (all options) are not expected to result in adverse health impacts.

Air Quality

The air quality analysis in the Draft EIR was conducted in accordance with state regulations and guidance issued by the South Coast Air Quality Management District (SCAQMD), the regional agency responsible for overseeing air pollutant emissions from CEQA projects. The analysis uses the thresholds of significance adopted by SCAQMD for criteria pollutants. These thresholds are closely linked to the California Ambient Air Quality Standards (CAAQS) and the National Ambient Air Quality Standards (NAAQS), which are established to protect health and welfare. The SCAQMD thresholds include limits for pollutants such as nitrogen oxides (NOx), particulate matter (PM_{10} and $PM_{2.5}$) and volatile organic compounds (VOCs), which are associated with respiratory and cardiovascular health risks when present at high levels. SCAQMD's thresholds account for both regional and localized impacts. SCAQMD's thresholds for regional emissions include specific mass daily limits for various pollutants, while SCAQMD's localized significance thresholds (LSTs), are specifically designed to assess the impact of pollutants on nearby sensitive receptors, such as residences, schools, and hospitals.

As shown in Table 3.4-15 and Table 3.4-21, and discussed in Section 4.5-3.4.1, the Draft EIR found that the construction of the Elevated/At-Grade Alignment, the Hawthorne Option and the LPA would not exceed any applicable SCAQMD thresholds. However, the Draft EIR found that construction of the Trench Option would exceed SCAQMD's mass daily threshold for NOx emissions during periods of maximum daily trucking activities. None of the options or alternatives would cause exceedances of the SCAQMD LTSs, as described in Section 3.4-4.3 and Section 4.5-3 of the Draft EIR and Sections 4.8 and 4.21 of this Final EIR.

During operation, each option and alternative evaluated in the Draft EIR would result in a net decrease in regional pollutant emissions (as shown in Table 3.4-18), due to passenger vehicle trips being displaced in lieu of community members utilizing the new transit system. Furthermore, the proposed light rail system would not generate operational emissions related to rail propulsion, as the light rail cars would be powered by electricity. Therefore, the project would contribute to improved air quality in the region, rather than cause adverse air-quality related health impacts.

The Trench Option would result in a temporary significant air quality impact during construction. To ensure that air pollutant emissions remain minimal during construction, the project includes robust project features, as summarized in Section 3.4 of the Draft EIR. All contracted construction activities would be required to comply with the provisions of SCAQMD Rule 403 – Fugitive Dust Best Management Practices (PF-AQ-2), as well as Metro's Green Construction Policy (PF-AQ-1). These include, but are not limited to, measures to stabilize soil, water disturbed areas, cover haul trucks, and utilize Tier-4 off-road diesel-powered construction equipment greater than 50 horsepower.

Additionally, measures such as pre-watering before grading, limiting vehicle speeds on unpaved surfaces, and ensuring all stockpiled materials are covered are expected to substantially reduce fugitive dust emissions (by between 36% to 91%), compared to construction activities where such controls are not applied. Actual reductions would vary depending on the specific activity and site conditions. These compliance measures are among the most stringent emission control methods available and would ensure that the project minimizes contributions to air pollutants during the construction phase. In some cases, additional dust suppressants may be utilized to further reduce dust generation.

Although construction of the Trench Option would exceed SCAQMD mass daily threshold for NOx during periods of maximum daily trucks, it is unlikely that these temporary and intermittent exceedances would cause health impacts. Most significant health effects from air pollutants are associated with long-term, continuous exposure rather than short-term, intermittent spikes. The most common health risks associated with NOx exposure, such as respiratory irritation and exacerbation of asthma, are typically tied to longer-term exposure. Furthermore, NOx emissions are subject to dispersal in the atmosphere, particularly in outdoor environments where air circulation and wind can dilute localized pollutant concentrations. This natural dispersion reduces the intensity of exposure, making it less likely that temporary increases in NOx would reach levels that could cause adverse health outcomes for nearby residents. This conclusion is further supported by the conclusion in the Draft EIR that construction of the Trench Option would not exceed SCAQMD's localized significance thresholds. It is not feasible to further correlate the Trench Option's significant and unavoidable NOx impact with impacts to human health due to the variability in individual susceptibility, the complex pathways of pollutant exposure, and the limitations in existing air quality models to link specific concentrations of pollutants directly to individual health outcomes.

5.2-5 MR-5: Vibration Impact Types and Impact Thresholds

Some commenters expressed concerns about vibration impacts. The vibration impact analysis was conducted in accordance with the FTA Manual, which addresses two separate types of impacts (annoyance and damage) for both temporary construction activity as well as long-term operations of rail facilities, as described below.

Vibration Annoyance

The FTA impact thresholds for vibration annoyance (construction and operation) are provided in Table 5.2-1 below. The limit of human perception for ground-borne vibration is generally considered to be about 65 VdB, but may vary from person to person. The FTA impact threshold depends on the number of events that occur per day; as the number of events increases, the threshold decreases (i.e. becomes more stringent). This reflects the fact that an increased number of events increases the potential for annoyance. For infrequent events (less than 30 events per day), the impact threshold for residential land uses is 80 VdB. When the frequency of events increases to 70 events per day or more (typical for light rail systems), the impact threshold decreases to 72 VdB, meaning that any projected vibration exceeding 72VdB is considered an impact. Table 5.2-1 depicts the relationship between human/structure response and typical vibration levels.

Table 5.2-1. Ground-borne Vibration (GBV) Impact Criteria for General Vibration Annoyance Assessment

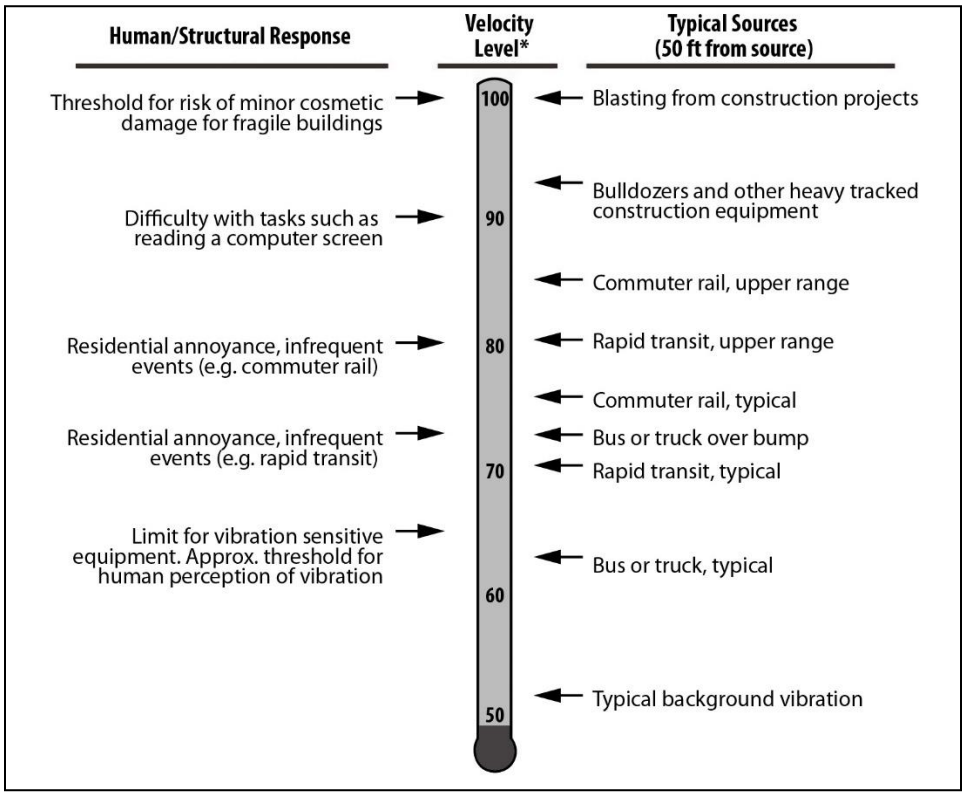
Land Use Category	GBV Impact Levels (VdB re 1 micro-inch/sec)		
	Frequent Events	Occasional Events	Infrequent Events
Category 1. Buildings where vibration would interfere with interior operations.	651	65*	65*
Category 2. Residences and buildings where people normally sleep.	72	75	80
Category 3. Institutional land uses with primarily daytime use.	75	78	83

Source: FTA 2018, Table 6-3.

Note: For frequency of events, Frequent Events = more than 70 events per day, Occasional Events = 30 to 70 events per day, and Infrequent Events = less than 30 events per day.

[1] This criterion limit is based on levels that are acceptable for most moderately sensitive equipment, such as optical microscopes. For equipment that is more sensitive, a Detailed Vibration Analysis must be performed.

Figure 5.2-1 Human/Structural Response to Typical Vibration Sources



Source: FTA, 2018

*RMS Vibration Velocity Level in VdB relative to 10^{-6} inches/second

In addition to the FTA guidance outlined above, the Draft EIR also acknowledges that some of the cities' municipal codes (Torrance and Redondo Beach) include sections covering vibration, generally stating that operating machinery that generates perceptible vibration at the adjacent property line is prohibited. However, using the limit of perceptibility at the property line would be an inappropriate threshold for two reasons. First, as stated above, the limit of human perception for ground-borne vibration is generally considered to be approximately 65 VdB (though may vary from person to person).

Like noise, perceptibility does not equal annoyance. The 65 VdB perceptibility level is more restrictive than the FTA vibration annoyance impact threshold of 72 VdB at residential properties for frequent events, which is a level that the FTA guidance considers to be barely perceptible. Second, ground-borne vibration is more typically experienced as an annoyance from within structures, where the vibration could cause rumbling, rattling of windows and shaking of items on shelves and walls. Lower levels of vibration in outdoor areas, such as at a property line, are not as perceptible and not normally evaluated for annoyance impacts. As stated in the FTA Manual, "Ground-borne vibration is almost never a problem outdoors. Although the motion of the ground may be perceived, without the effects associated with the shaking of a building, the motion does not provoke the same adverse human reaction." Section 3.6 of the Draft EIR discloses the areas which would be impacted by construction and/or operational vibration at the nearest vibration-sensitive structures (which would normally include human living spaces, but not garages or workshops), and various mitigation measures have been proposed to mitigate vibration levels below the FTA threshold of significance. The precise type and extent of required vibration mitigation in these areas would be determined in the final design phase, per FTA guidance and the results of the more detailed analysis.

Vibration Damage to Structures

The level of vibration that could potentially result in structural or architectural damage has been studied for several decades on a wide variety of vibration-producing projects. The building vibration damage criteria established by FTA (shown in Table 5.2-2), are generally more conservative than thresholds set by other agencies, ensuring a higher level of protection against potential damage. The building/structure categories identified in the first column account for different impact thresholds based on the type of structure. For this analysis, residential structures in the project area were classified as Category III structures, with a potential damage threshold of 0.2 inches/second. This threshold is appropriate for typical wood framed construction with interior drywall and exterior stucco or wood siding, which are characteristics broadly representative of residential buildings in the area, including older homes. It also encompasses structures with more vibration-sensitive materials, such as plaster walls, which may be present in homes built prior to the widespread use of modern drywall. The Category III classification is consistent with the general age and construction types found throughout the South Bay, where most housing development occurred after World War II. Accordingly, the analysis conservatively assumes Category III for residential structures in the project vicinity.

Table 5.2-2. FTA Ground-Borne Vibration (GBV) Impact Criteria for General Vibration Assessment

Building/Structural Category	PPV, IN/sec	Approximate L_v
I. Reinforced concrete, steel, or timber (no plaster)	0.5	102
II. Engineered concrete and masonry (no plaster)	0.3	98
III. Non-engineered timber and masonry buildings	0.2	94
IV. Buildings extremely susceptible to vibration damage	0.12	90

Source: FTA 2018.
Note Lv = RMS velocity in decibels, VdB re. 1 micro-in/sec.

Regarding construction impacts, each type of construction equipment needed for the project was assessed for its potential to generate vibration, taking into account both the level of vibration and the distance over which the vibration could extend and potentially cause architectural or structural damage. This information was compared against the FTA ground-borne vibration criteria to determine which equipment, if any, could exceed the threshold for Category III residential buildings and cause structural damage.

Regarding operational impacts, ground-borne vibration from light rail trains is not typically a concern during operations because vibration generated by light rail trains would not exceed the FTA vibration damage criteria. The vibration generated by light rail trains would be mitigated to levels that would not exceed the annoyance vibration threshold (72 VdB/0.015 inches per sec.) for residential structures, which is well below the range for vibration damage potential (94 VdB/0.21 inches per sec.) for most residential structures. Mitigation measures that would be implemented during operation include MM-VIB-4 (Low Impact Frogs), MM-VIB-5 (Resilient Fasteners), and MM-VIB-6 (Ballast Mats). The full text of the mitigation measures is included in Section 3.6-5, Noise and Vibration, of the Draft EIR. Therefore, mitigating vibration annoyance impacts would also mitigate any operational damage impacts.

5.2-6 MR-6: Vibration Analysis During Final Design

The vibration analysis conducted for the Draft EIR follows the FTA Manual for a "General Analysis," which is appropriate when multiple project alternatives or options are still under consideration. Appendix 3.6-C of the Draft EIR includes detailed maps showing the specific construction operational vibration impacts of the Elevated/At-Grade Alignment, the Trench Option, and the Hawthorne Option. Maps depicting the vibration impacts for the LPA are included in Section 4.21 of Chapter 4, Corrections and Additions, of this Final EIR. The level of analysis is sufficient to identify and compare the potential vibration impacts associated with each alignment option.

For instance, the Draft EIR identifies specific types of construction equipment likely to cause vibration levels at specific distances exceeding the damage thresholds for nearby structures, most of which are residential buildings that fall within Category III of the FTA guidelines. Additionally, the Draft EIR evaluates vibration annoyance impacts to residences (the only Category II land uses within close enough proximity to the alignment to experience annoyance impacts). This level of detail is sufficient to identify the potentially significant vibration damage and annoyance impacts at sensitive receptors along each of the alignment options under consideration.

The EIR also provides detailed mitigation measures with specific performance standards to address the impacts to the maximum extent feasible. For example, Mitigation Measure MM-VIB-1 (Vibration Control Plan) requires the contractor to develop a comprehensive plan that includes vibration monitoring, demonstrating compliance with FTA's vibration annoyance criteria, and using alternative construction methods where feasible. Similarly, MM-VIB-2 establishes specific limits on the operation of high-vibration equipment, such as vibratory rollers and pile drivers, near sensitive structures. It requires the use of alternative techniques, like Cast-In-Drilled-Hole (CIDH) piles, which significantly reduce vibration impacts in most instances. This mitigation measure ensures that construction activities are modified in real-time to minimize impacts.

While the Draft EIR conservatively assumes that impact pile driving for the Elevated/At-Grade Alignment may be necessary to reconstruct the Grant Avenue freight bridge, MM-VIB-3 is included to mitigate the risk of structural damage by requiring pre- and post-construction surveys. These surveys would ensure that any damage caused by construction vibration is identified and repaired. However, for the Elevated/At-Grade Alignment, it is acknowledged that one damage impact to a residential structure near Grant Avenue may remain unavoidable. The LPA, Trench Option, and Hawthorne Option would not construct a new freight bridge at Grant Avenue and would avoid vibration damage impact to the residential structure near Grant Avenue.

The Draft EIR acknowledges that some annoyance impacts from construction could remain, as not all high-vibration equipment could be feasibly replaced. For operational impacts, all vibration damage and annoyance impacts would be mitigated or avoided. Importantly, the Draft EIR does not defer the analysis or mitigation of these impacts. Instead, the mitigation measures include specific, enforceable

standards to limit the effects of vibration. Once the final alignment is selected, a more "detailed" vibration analysis (as defined by the FTA Manual) could be conducted, which would include empirical vibration testing (also referred to as transfer mobility testing) at key locations. This testing would provide higher-resolution data on future vibration levels for the selected alignment and vehicle types, allowing the project to fine-tune vibration mitigation measures to ensure operational vibration levels are reduced to less than significant levels. The detailed analysis would serve to refine and confirm the results of the Draft EIR's General Analysis, which has already identified all significant vibration impacts and proposed sufficient mitigation measures to address them.

5.2-7 MR-7: Utility Relocation and Hazardous Materials Safety

Some commenters expressed concern over the risks related to relocation of underground utilities and pipelines within the Metro ROW, particularly those carrying petroleum or other hazardous materials. These concerns include potential hazards from accidental damage to underground infrastructure during construction. Commenters also raised concerns about the long-term safety of operating relocated freight trains and light rail trains above existing or relocated underground utilities and pipelines. These risks would be addressed through established design and construction processes, as described below.

Verification of Utility Locations

Metro has extensive experience overseeing the design and construction of light rail projects and has successfully managed utility protection-in-place and relocations in coordination with third parties for complex transit projects throughout the region. As with all Metro projects, licensed engineers would be engaged throughout the design and construction process to oversee utility relocations and ensure that industry standards are followed. These engineers are experienced in evaluating the stability of existing onsite soils and underground utilities and developing solutions that avoid long-term impacts to utility lines and infrastructure and maintain their integrity. The project design would take into account the specific characteristics of the onsite soils and underground utilities, including the location, type, and sensitivity of each utility. Where necessary, Metro would work with third party owners of utilities to incorporate necessary reinforcements and protective casings to ensure long-term stability and avoid any future issues.

As described in Section 3.11-2.4 of the Draft EIR, the project includes Project Feature PF-US-1, Utility Identification and Coordination, which outlines measures to ensure proper coordination with utility owners. Utility verification is a rigorous, iterative process that occurs throughout all phases of the design process. It begins with requesting and reviewing available utility data and as-built drawings and continues during the future more detailed design phases with the collocation of more detailed data. This may include obtaining utility owners' in-line inspection[4] records, which provide precise and up-to-date information on the horizontal and vertical locations of pipelines and other infrastructure. Additionally, exploratory work, such as utility potholing, is performed to physically confirm the depth and locations of underground utilities and minimize uncertainties before construction begins.

It is important to note that some utility information, including exact locations and specifications, is not publicly disclosed due to confidentiality and security considerations. For the Draft EIR, petroleum pipelines and other utilities were identified based on available records, advanced conceptual engineering (ACE) drawings and coordination with utility companies. Select utilities, including petroleum pipelines, are shown in the cross-sections of Appendix 2-A of the Draft EIR. While these cross-sections

[4] Utility owners periodically conduct in-line inspections of their lines using sensors that travel through the lines to detect potential defects as part of their maintenance procedures; this data can be used to precisely locate utility lines.

are not intended for final design-level mapping, they provide sufficient information to identify the general location and configuration of utilities within the Metro ROW for environmental analysis.

The level of detail provided in the Draft EIR is appropriate for evaluating potential environmental impacts associated with utility and pipeline relocation. The analysis accounts for temporary construction-related emissions, disruptions to roadway circulation, and possible service interruptions. To ensure a conservative assessment, the Draft EIR also accounts for design-level uncertainties inherent in early phases of project development. This approach ensures that the environmental analysis adequately identifies potential impacts related to utilities and utility relocations while maintaining flexibility for final engineering refinements.

Pipeline Hazardous Materials Safety Through Design and Construction

To the greatest extent possible, the project requires pipelines and utilities to be protected in place during construction, rather than relocated. Determining whether a utility could remain in place depends on several factors, including its burial depth and distance from the proposed track. Pipelines that cross the tracks but meet the necessary clearance requirements would be protected by both the depth of burial and by casings[5] that extend across the entire width of the Metro ROW. Pipelines that run parallel to the track would generally not need to be encased, provided they meet applicable minimum safe distance and depth standards, including relevant safety regulations and utility owner standards. These measures are consistent with the current industry practices for underground pipeline protection. Metro is coordinating closely with utility owners to ensure that protection-in-place measures reflect applicable safety requirements and current engineering standards. In some cases, this coordination may involve confirming that existing facilities meet current clearance and safety criteria, or identifying additional protective measures as needed, such as, but not limited to, longer encasements. Where a pipeline cannot remain in place due to project design constraints or the need to maintain access for future maintenance, it would be relocated within the railroad corridor in compliance with applicable federal, state, and local safety and design standards. During construction, Metro and its contractors would follow established utility protection protocols and construction techniques and procedures to prevent accidental damage to underground utilities. Any necessary design variances would be coordinated with the relevant owning and regulatory agency through their formal variance process. Prior to excavation, Metro and its contractors would be required to locate existing underground utilities in accordance with California Government Code 4216.2 to minimize risk. Only certified contractors would be permitted to relocate utilities, and they would be required to notify the utility owners in advance and follow all owners' standard operating procedures. These procedures include marking designated utility relocation areas with flags, using hand-digging techniques at certain depths to minimize the risk of hitting underground lines, and ensuring that on-site inspectors monitor construction activities to verify compliance with safety protocols.

Some commenters raised concerns that construction-related vibration would damage existing underground utilities. However, the levels of ground-borne vibration expected during project construction are not anticipated to exceed the levels at which damage to underground utilities could occur. Most pipelines are buried at depths where vibration from surface construction dissipates significantly and are designed to withstand vibration associated with urban development and roadway construction. Moreover, geotechnical engineers and licensed contractors routinely evaluate soil conditions, pipeline depth, and distance from equipment when selecting construction methods, and incorporate design safeguards accordingly. As discussed below with respect to operational vibration

[5] A pipeline casing is a large-diameter steel pipe that encases the utility line, which takes the load from the trains above and protects the pipeline from damage.

effects, Caltrans' Transportation and Construction Vibration Guidance Manual (2020) similarly finds that even high-impact activities such as mine blasting rarely produce vibrations intense enough to damage buried pipelines. Therefore, with implementation of standard engineering and construction practices, the risk of vibration-related damage to underground utilities would be minimal and would not constitute a significant hazardous impact.

Some commenters also raised concerns that unstable soils could increase the risk of subsidence or inadvertent pipeline exposure, potentially leading to hazardous material releases during construction. As discussed in Section 3.8-4.2 of the Draft EIR, Metro and its contractors would implement industry-standard construction techniques such as sloping, benching, or shoring to stabilize soils during excavation activities, including trench construction and utility relocation. These are well-established methods used to prevent soil movement and maintain structural integrity in areas with loose or unstable soils. Metro recognizes that proper soil stabilization is essential to maintaining the safety of both construction workers and surrounding infrastructure, particularly in areas where underground utilities are present. Through the application of appropriate stabilization methods, the risks of subsidence or inadvertent pipeline exposure would be effectively managed, preventing accidental damage to underground utilities and minimizing the risk of hazardous materials releases during construction. This would be a less than significant impact. For additional information regarding these techniques, see MR-13: Soil Stability and Sink Holes.

The analysis in Section 3.9-4.2.1 was revised in Section 4.13 of Chapter 4, Corrections and Additions, of the Final EIR, to include expanded descriptions of the steps that Metro would take during utility verification and construction, which would minimize the risk of hazardous material release during construction.

Pipeline Hazardous Material Safety During Operation

Once operational, the light rail and freight trains would not pose a risk to underground utilities, including high-pressure gas pipelines. Any utilities affected by the project would have either been relocated during construction in compliance with utility setback requirements or protected in place using appropriate engineering measures. For this project, pipelines within the Metro ROW would be buried at minimum depths of at least three feet below the tracks.

Vibration levels generated by the operation of light rail transit vehicles and freight trains would remain well below thresholds known to cause damage to buried pipelines. At a depth of three feet, a light rail vehicle traveling at 50 miles per hour (mph) would generate a vibration level of approximately 85 VdB, corresponding to a peak particle velocity (PPV) of 0.07 inches per second. A freight train traveling at 20 mph would generate a vibration level of approximately 88 VdB, corresponding to a PPV of 0.10 inches per second. Both of these values are significantly below international safety standards for buried utilities. For example, the British Standard BS-7385-2, *Evaluation and measurement for vibrations in buildings – Guide to damage levels from ground borne vibration*, identifies a conservative damage threshold of 1.2 inches per second (30 mm/s), which is more than ten times higher than the project's expected vibration levels. Additional research cited in this standard, such as studies by Dowding and Akayya (2013) and Francini and Baltz (2008), identified safe vibration levels for buried structures ranging from PPV levels of 5 to 10 inches per second.

Other technical sources support these findings. The Caltrans *Transportation and Construction Vibration Guidance Manual* (2020), which is a well-researched and highly regarded technical reference used in a variety of projects, explains that buried pipelines are generally protected by the surrounding soil and bedding materials, which help absorb and dissipate vibration. As a result, buried pipelines can withstand significantly higher vibration levels than those generated by typical train operations. The manual cites

evidence that even extreme activities such as mine blasting, do not generate vibration levels that damage buried pipelines. For example, the manual cites a case in which an explosive buried near a pipeline generated a PPV of 25 inches per second, yet no damage to pipelines occurred. This level of vibration is far greater than the vibration levels expected from the project operations and also exceeds the FTA vibration damage criteria used in the Draft EIR (see Table 5.2-2 of MR-5, above). Similarly, a cased water well and a standard water well were exposed to PPVs ranging from 5.44 to 8 inches per second with no recorded damage. These examples illustrate that the vibration levels associated with project operations, which are orders of magnitude lower than these thresholds, would not produce a risk to underground pipelines.

With respect to concerns about the long-term effects of vibration on pipelines, the available evidence does not support the idea that repeated exposure to low-level vibrations gradually weakens underground pipelines over time. Vibration-induced damage typically occurs as a single event when vibration levels exceed a structure's specific threshold, rather than accumulating over time. Although there are a few specialized scenarios where long-term vibration exposure could cause wear-and-tear (e.g., the thin metal fuselage on aircraft subjected to continuous pressurization and depressurization), oil and gas pipelines are fundamentally different. They are typically made of thick metal, often 1 to 2 inches thick, and in many cases would be further protected as part of this project by steel encasements. These materials are designed to withstand far greater force than the low levels of vibration generated by light rail and freight train operations, even over the long term.

5.2-8 MR-8: Light Rail and Freight Train Safety

Some commenters expressed concern about rail safety in and around the Metro ROW, particularly regarding increasing the number of trains in the corridor, the potential for freight train derailment, and the risk of accidental release of hazardous materials being transported by freight. They also questioned whether the Metro ROW is wide enough to safely accommodate two new light rail tracks and a freight track. Engineering analyses confirm that, with design tailored to the corridor's constraints and conditions, including limited widening in certain locations, the Metro ROW can be configured to safely accommodate both light rail and freight operations. Metro is committed to enhancing safety throughout the corridor and would implement infrastructure improvements and operational protocols in compliance with applicable federal, state, and local safety standards. As described below, the project has been, and would be, designed to meet established regulatory standards, safety protocols, and structural requirements to ensure the safe coexistence of light rail and freight operations within the Metro ROW.

Metro ROW Width

In the residential areas of Lawndale and Redondo Beach, the Metro ROW is generally about 100 feet wide, with some exceptions. It is narrowest between 170th Street and Artesia Avenue, where it is 75 feet wide, and just south of 182nd Street, where it is between 83 and 84 feet wide. Metro conducted a property survey in Spring 2025 to verify Metro's property boundaries, as reflected in the Final EIR, Appendix B, Select Advanced Conceptual Engineering Drawings - Locally Preferred Alternative. Throughout the entire corridor, the Metro ROW is sufficiently wide to accommodate project elements safely, including tracks, retaining walls, and soundwalls. Safety spacing informed by requirements established by Metro, BNSF, and CPUC have been and would be incorporated into the project design to ensure safe operations. These include:

> Distance between freight track to the nearest wall or structure: The design follows a minimum distance of 10 feet between the freight track and a wall/fence/post, and eight feet between the

freight track and trench wall. These distances are consistent with CPUC General Order 26-D regarding minimum side clearances.

> Distance between light rail track to the nearest wall or structure: Metro's design standards require eight feet.

> Distance between the northbound and southbound light rail tracks: Metro's design standards require 14 feet between the centerlines of the two light rail tracks.

Taking these distances together, a minimum "envelope" of 50 feet would be needed for the at-grade light rail and freight track, and 48 feet for the trench configurations. This is well within the Metro ROW, which is at least 75 feet wide through Lawndale and Redondo Beach. The remaining space outside the rail elements is typically used for utility corridors and maintenance access. With the addition of the light rail tracks, these utility corridors and maintenance access would be reconfigured within the Metro ROW. Their design would be developed in consultation with BNSF, CPUC, utility owners, and other third parties. As described more fully below, these relocations are expected to be accommodated within the existing Metro ROW, with the exact configuration, including any needed design variances, determined as design advances, and with safety the paramount consideration. In limited locations, such as south of 190th Street, partial permanent acquisitions are planned to provide additional space for BNSF storage needs; none would involve the acquisition of homes.

The representative cross-sections below (Figure 5.2-2, Figure 5.2-3, and Figure 5.2-4) show examples of how the light rail and freight guideways, along with other elements such as retaining walls, soundwalls, maintenance walkways, utility corridors, and a multi-use path, fit safely within the available ROW. Even with all these additional elements, there is sufficient space to accommodate both the project and freight operations safely.

Figure 5.2-2. Representative At-Grade Cross-Section

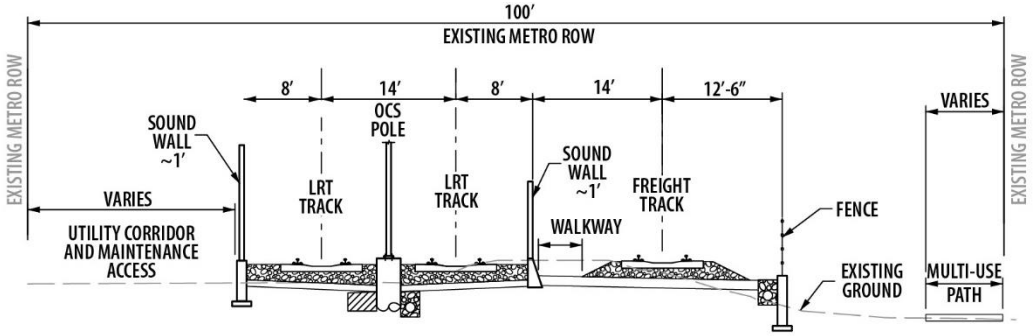


Figure 5.2-3. Representative Trench Cross-Section

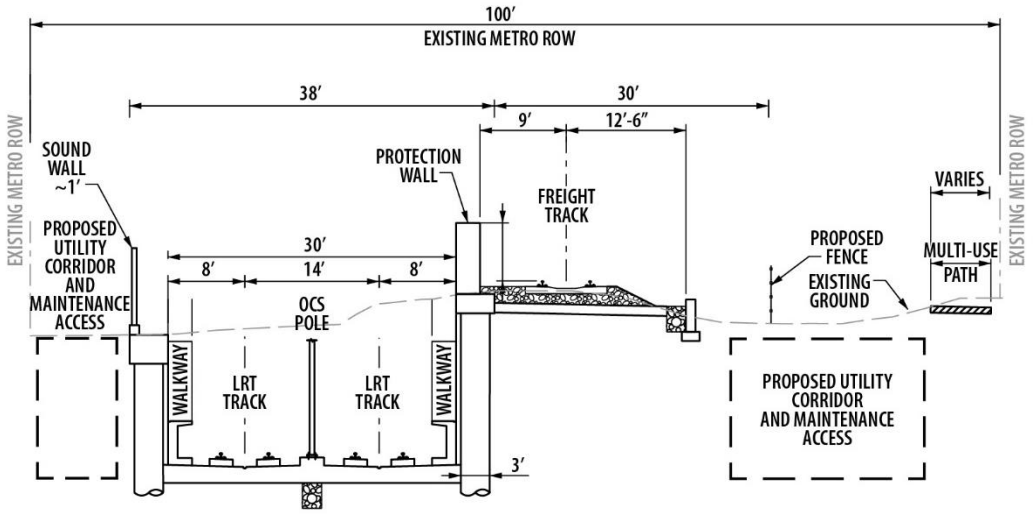
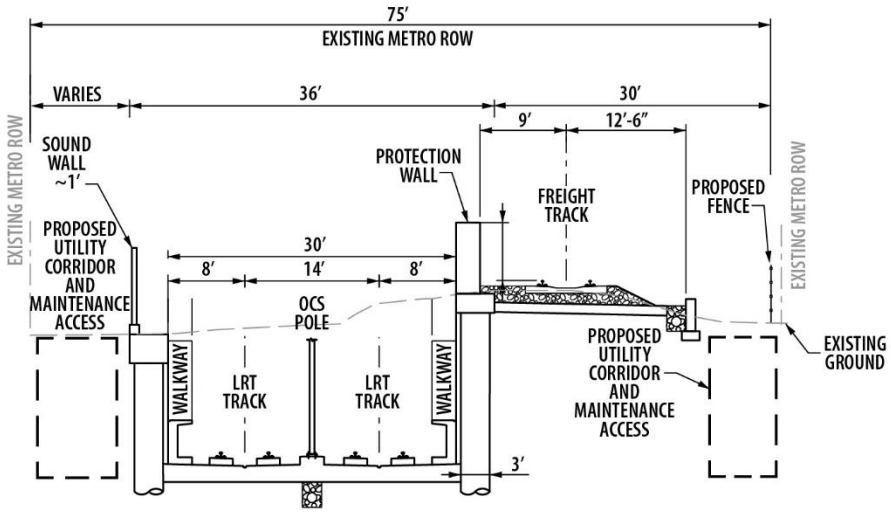


Figure 5.2-4. Representative Cross-Section at Narrowest Areas of the ROW



Utility Proximity to Tracks

As indicated, existing pipelines and other underground utilities run parallel to the freight tracks within the Metro ROW and operate under license agreements with Metro. These agreements authorize Metro to direct utility owners to remove or relocate their facilities at any time, although Metro does not plan to exercise that authority. Advanced conceptual engineering shows that, while some freight tracks and pipelines will need to be shifted within the corridor, there is sufficient space to accommodate the proposed light rail infrastructure, the BNSF freight tracks, and the utilities. South of 190th Street, the conceptual engineering plans include partial permanent acquisitions to widen the rail corridor in certain areas to address BNSF storage needs. Elsewhere, the ROW width would remain unchanged and the project would not require permanent acquisition of homes to accommodate the project.

Metro has received comments expressing concern that Metro could not meet BNSF's *Utility Accommodation Policy* (February 12, 2025) without acquiring adjacent residential properties. The BNSF

Policy applies only to utilities on BNSF-owned property (Part 1, Section A.1). With the exception of segments in Torrance south of 190th Street, the Metro ROW is owned entirely by Metro. Although BNSF's policy does not govern Metro property, Metro intends to use it as a design guideline and follow its provisions where safe and practical.

Part 2, Section C.5.b.i of the Policy generally requires that any pipeline parallel to BNSF property be located within 10 feet of the property line and at least 40 feet from the nearest track. While this spacing is feasible in rural or new greenfield corridors, it is impractical in older, urban rail corridors such as the Metro ROW (the historic Harbor Subdivision railroad corridor, constructed in the late 1800s), where many existing pipelines are much closer—sometimes only a few feet from the current freight tracks. Recognizing these realities, Part 1, Section A.4 of the Policy allows exceptions where hardships exist and alternative protective measures can achieve the Policy's safety intent. Metro would apply this flexibility where necessary to ensure designs remain both safe and practicable.

In dense urban settings, such alternative measures can include steel casing around pipelines, reinforced concrete utility trenches, specialized trench backfill materials, crash walls, or sheet piling between tracks and pipelines to protect against surcharge loading. These approaches have been used successfully on other Metro rail projects and would be incorporated into the final design of the C Line Extension to ensure the corridor's safety.

Metro would not design or construct any improvements that would create a condition less safe than what exists today.

Safety Infrastructure Improvements

Prior to commencing revenue service, Metro would implement a suite of safety features designed to enhance rail safety, prevent unauthorized access, and improve pedestrian and vehicle protection at at-grade rail crossings, as applicable. These features include:

> Vehicle gates and pedestrian gates: Gates would be installed at at-grade crossings to help prevent vehicles and pedestrians from crossing the tracks when a light rail vehicle and/or a freight train is approaching. For the Elevated/At-Grade Alignment, the gates would apply to both light rail and freight trains, while for the Trench Option and LPA the gates would be installed for freight only, as there would be no at-grade light rail roadway crossings.

> Warning signals: Visual and audible signals would be installed at all at-grade crossings to alert pedestrians and drivers when a train is approaching. Similar to gate installations, signals would apply to both light rail and freight for the Elevated/At-Grade Alignment, and to freight trains only for the Trench Option and LPA.

> ADA-compliant sidewalks and ramps: Pedestrian access across freight tracks would be improved through the installation of ADA-compliant sidewalks and ramps, ensuring safe and accessible crossings for all Metro ROW alignment options.

> Fencing and soundwalls: The light rail guideway would be fully enclosed with fencing, soundwalls, or a combination of both for all alignment options. These barriers would restrict unauthorized access to both the light rail and freight tracks, enhancing security. The soundwalls would also serve as noise mitigation.

Safety elements would also be provided at the proposed light rail stations. The stations would incorporate the latest safety enhancements and follow the principles of Crime Prevention Through Environmental Design (CPTED). CPTED principles promote open sight lines, discourage enclosed spaces out of public view, and integrate other design features to deter crime and improve public safety. See

MR-9: Light Rail Security for more information. Additional safety features implemented at the proposed stations would include:

> Canopies to provide weather protection and shelter;

> Station lighting to improve security and enhance visibility;

> Wayfinding signage to help passengers navigate stations safely and efficiently; and

> Security equipment, such as closed-circuit televisions (CCTV), public announcement systems, passenger assistance telephones, and variable message signs providing real-time updates.

Metro would also implement a public safety outreach program to educate the community about rail safety, particularly about at-grade crossings. This program would inform residents of all ages and backgrounds of safe corridor practices, train operations, and best practices for pedestrian and vehicle safety near the rail corridor.

By incorporating these and other safety features and complying with existing safety regulations and standards, Metro would enhance safety throughout the corridor and ensure that the project would not introduce unacceptable safety risks.

Risk of Freight Derailment

Some commenters raised concerns regarding the potential risk of freight train derailments and associated possibility of hazardous materials releases. However, derailment risks within this corridor are already low, and the project would not introduce any elements that would increase this risk.

Freight derailments are primarily caused by three critical factors: (1) improper wheel and vehicle maintenance; (2) excessive speeds that exceed the track design limits; and (3) track discontinuities (such as special trackwork, joints in the track, and obstructions on the track). Industry-wide investments in safety technology, training, and equipment maintenance have contributed to a 42% reduction in mainline freight accidents between 2000 and 2023 (Association of American Railroads, 2025), demonstrating the effectiveness of modern freight safety practices even as local investment levels may vary.

Freight derailments, when they happen, overwhelmingly occur in railroad yards or on freight industry tracks, where frequent switching maneuvers and high train-traffic volumes increase risks. Derailments on mainline freight tracks, such as those that run through this corridor, are uncommon. For example, between 2020 and 2024, approximately 430 freight derailments occurred in California, with over 70% occurring within yards and industry tracks. Crucially, for all types of derailments, there were zero injuries or fatalities (FRA 2025).

Safety is integral to the project's design. The project would comply with applicable safety standards, including those established by FRA, Metro, the CPUC, and BNSF Railway. These entities set rigorous standards for infrastructure condition, track spacing, protective barriers, fencing, and crossing infrastructure to minimize derailment risks and protect nearby communities.

The project would also incorporate multiple safety improvements, including:

> Optimized track spacing: Freight and light rail tracks would be spaced appropriately to maintain sufficient separation, reducing the risk of collisions;

> Upgraded freight rail infrastructure: Where freight tracks would be relocated, Metro would install new and upgraded rail infrastructure wherever physically feasible. Between 2020 and 2024, approximately 25% of derailments in California were caused by track defects, such as rail or switch

issues (FRA 2025). Replacing aging freight rails with modern rails would reduce the risk of track-related incidents;

> Protective fencing and barriers: Fencing and other physical barriers would be installed along the entire alignment to prevent unauthorized access and reduce the potential for obstructions on the track;

> Intrusion detection system: A real-time monitoring system would be installed to detect freight and/or light rail derailments, allowing for immediate intervention;

> Enhanced at-grade crossing safety: The project would implement state-of-the art safety infrastructure at all at-grade freight crossings, including signals, gates, and pedestrian protections, to help prevent vehicle or pedestrian incursions on the tracks, reducing the risk of collisions that could create track obstructions;

> Improved communication protocols: Metro would establish direct coordination procedures with freight operators to ensure immediate response in the event of a derailment or other emergency;

> Emergency responder training: Metro would provide specialized training for emergency responders on derailments and other rail-related emergencies. Regular drills and exercises would be conducted to ensure readiness in the unlikely event of an emergency.

The project would not increase the risk of derailment. In fact, through compliance with the safety standards and implementation of the project elements, above, the project would likely reduce existing risks by improving track infrastructure, introducing state-of-the-art intrusion detection technology, and enhancing emergency preparedness. Because the project would not increase the risk of freight derailment, it would also not increase the risk of hazardous material releases resulting from a freight derailment.

Finally, as previously indicated, in the unlikely event of a derailment, the low freight train speeds within this corridor (approximately 20 miles per hour) would substantially minimize the momentum and distance a train could shift off the tracks, thereby reducing the likelihood of severe damage or hazardous material release.

5.2-9 MR-9: Light Rail Security

Some commenters expressed concern that the project could increase security risks by providing new access points in the area for individuals who may engage in criminal activity and/or build encampments along the Metro ROW.

Metro takes public safety very seriously. In June 2024, the Metro Board of Directors unanimously approved the establishment of the Metro Transit Community Public Safety Department (TCPSD). The objectives of the Metro TCPSD are increased visibility, accountability, and consistent service delivery throughout the Metro system. In May 2025, Metro selected William Scott to serve as the agency's first Chief of Police and Emergency Management. The department is designed to support a safer transit experience through a specialized transit community public safety workforce trained specifically to address the needs of transit riders, as well as employing care-based strategies. CEQA is designed to address the physical environmental impacts of a project, such as noise, air quality, and biological resources. Social and economic issues, such as crime, are not within the scope of CEQA's required analysis (CEQA Guidelines, Section 15382). However, Metro acknowledges the community's concerns and wants to ensure community members are aware of the unparalleled steps the agency is taking to ensure the transit system is safe, clean, and easy to navigate.

The project design incorporates the best practices of CPTED, ensuring that the proposed stations are designed to be safe and secure. Key features of CPTED in the project's proposed station designs include open sight lines to enhance visibility and the elimination of isolated or disjointed spaces where individuals could be concealed. In addition to these physical design elements, security equipment would be installed at all stations and light rail vehicles. This equipment includes security cameras for continued monitoring and emergency phones for passengers to access help quickly when needed. See MR-8: Light Rail and Freight Train Safety, which also discusses project safety features.

In addition to incorporating CPTED principles, Metro continues its commitment to improving public safety with a three-point plan:

> Enhanced Visible Security Presence: Metro aims to keep our employees and customers safe and ensure they feel safe through an increased visible presence of uniformed personnel, station improvements and improved bus safety measures;

> Ensuring Proper System Usage: To ensure the system is being used only for its intended purpose of transit, Metro is making improvements to fare gate systems and enforcing stricter measures to prevent trespassing; and

> Collaboration: Metro continues to partner with the County, the Cities and Regional Agencies to address societal issues such as housing insecurity, untreated mental illness, and drug addiction, to ensure that transit safety is part of a larger community-wide effort to address these complex challenges.

As part of this strategy, Metro's law enforcement partners have expanded their visible presence on the rail system and increased the number of Transit Security Officers (TSOs) to enforce Metro's Customer Code of Conduct on both the bus and rail systems. Metro Ambassadors are also deployed on Metro's six rail lines and five of the busiest bus lines, to provide support to customers and keep a watchful eye out for problems in order to identify potential safety issues before they escalate.

5.2-10 MR-10: Changes to Community Character

Some commenters expressed concerns that the project could result in changes to community character. These concerns include the potential loss of green space, perceived division of community due to the light rail operating along the Metro ROW within the City of Lawndale, and the assertion that light rail within the Metro ROW contradicts city general plans. Additionally, some commenters worried that the light rail system could negatively affect quality of life in the surrounding area.

It is important to note that CEQA does not require an analysis of "community character" as an environmental impact in and of itself. CEQA requires analysis of physical environmental impacts, such as impacts to land use, aesthetics, air quality and noise, not subjective or social changes like shifts in community identity or character.

However, although community character is not a stand-alone impact under CEQA, the Draft EIR addresses related concerns, including in Section 3.2, Land Use, and Section 3.3, Aesthetics.

Land Use

The CEQA Guidelines recognize that economic or social effects of a project may be considered when determining the significance of a physical change caused by the project. According to Section 15131(b) of the CEQA Guidelines, "if construction of a new freeway or rail line divides an existing community, the construction would be the physical change, but the social effect on the community would be the basis for determining that the effect would be significant." Therefore, an EIR should examine how a project might create physical barriers that disrupt or alter the connectivity of a community.

For this project, the Elevated/At-Grade Alignment, Trench Option, and LPA would run within the existing freight corridor through a predominantly residential area in Lawndale. In some locations, safety fencing along this corridor is not maintained or has been breached, allowing unauthorized crossings by residents. Additionally, along portions of Condon Avenue which lack sidewalks, some residents use the freight corridor for recreational activities, which is neither authorized nor compliant with freight safety standards. With the introduction of a light rail line and reconstruction of the freight line on new tracks, residents would no longer be able to freely cross the Metro ROW where existing fencing has been breached. The project would include new or repaired security fencing, as well as other barriers such as soundwalls (as described in Section 3.6, Noise and Vibration of the Draft EIR) adjacent to the light rail tracks to meet rail safety standards.

Although these safety improvements would restrict unauthorized pedestrian access into the Metro ROW, they would not physically divide the community. Residents would still be able to cross the Metro ROW at the existing street crossings (Inglewood Boulevard, Manhattan Beach Boulevard, 159th, 160th, 161st, 162nd, and 170th Streets in Lawndale and 182nd Street in Redondo Beach), which would all be rebuilt with upgraded freight safety infrastructure. As these existing crossings would remain open and functional, the project would not result in the physical division of an existing community.

For the Hawthorne Option, the alignment would be entirely elevated, running parallel to I-405 and continuing southbound in the median of Hawthorne Boulevard. No conflicts would exist between street and light rail crossings. Although changes to the roadway configuration along Hawthorne Boulevard would be needed to support an elevated guideway, crosswalks would be maintained, replaced, or added, ensuring no impediment to crossing from one side of the community to the other. The primary changes to the roadway would involve reconfiguring intersections to relocate left turn lanes and reducing median parking due to conflicts with the guideway's support columns. While this may alter traffic flow, it would not prevent vehicles or pedestrians from crossing Hawthorne Boulevard, and therefore, there would be no physical division of the existing community.

Regarding consistency with local general plans, Sections 3.2-4.2 and 4.5-3.2 of the Draft EIR analyze whether the Proposed Project (Elevated/At-Grade Alignment), Options and CEQA Alternatives would cause a significant environmental impact due to a conflict with any land use plans, policies, and regulations adopted for the purpose of avoiding or mitigating an environmental impact. The analysis concludes that both construction and operation of the Elevated/At-Grade Alignment, Trench Option, Hawthorne Option, and LPA would result in less than significant impacts.

Some commenters asserted that the project would conflict with Lawndale's General Plan, particularly its designation of the Metro ROW as "open space." To clarify, at the time Metro issued the Draft EIR in January 2023, the City of Lawndale's General Plan designated the Metro ROW as "Public Facilities/Schools," not open space. This designation is shown on Figure 3-3 (Existing General Plan Land Use Map), of the City's Draft EIR for its General Plan Update (Lawndale 2023). CEQA did not require Metro to consider the project's consistency with the then-*draft* General Plan Update. (C*haparral Greens v. City of Chula Vista* (1996) 50 Cal.App.4th 1134, 1145, fn. 7 (no requirement to evaluate consistency with draft plans).)

In addition, Metro, as a legislatively created regional transportation authority, is not subject to local zoning and planning requirements. Although Metro considers the concerns of local jurisdiction, it retains the legal authority to carry out projects in accordance with its statewide transportation mandate. Metro, not the City of Lawndale, has jurisdiction over the Metro ROW. While Metro acknowledges that the City of Lawndale's General Plan Update includes the Metro ROW within its open space inventory, the Metro ROW has long been used as an active rail corridor dating back to the 1880s and introducing

light rail within this corridor is consistent with its former Public Facilities/Schools designation, as well as with its historic and current use. Recreational use of the Metro ROW has never been authorized, as the Metro ROW is part of an active transportation corridor. Any suggestion that the Metro ROW is a designated recreational area or parkland is inaccurate.

The City of Lawndale's reclassification of the Metro ROW from Public Facilities/Schools to Open Space in the General Plan Update could reflect the intent to recognize the corridor's potential for multiple uses, including transportation infrastructure and authorized public access. The introduction of light rail would not inherently conflict with the community's long-term goals for public and open spaces. In fact, the project would enhance public access by introducing safe, multi-use paths parallel to the rail tracks in two segments of the alignment. These paths would offer dedicated walking and biking space in areas, such as along Condon Avenue in Lawndale, where sidewalks do not currently exist, thereby enhancing the functionality and safety of the corridor for pedestrians. The project is also consistent with other aspects of Lawndale's General Plan Update, including the transit-supportive policies and implementation actions identified to achieve Goal M-5, which works to provide a comprehensive public transportation system, which would include light rail service.

More broadly, introducing light rail into the Metro ROW would advance the objectives of local and regional plans aimed at reducing reliance on single-occupancy vehicles, lowering emissions, and improving public transit. By supporting these broader goals, the project would be consistent with and promote the overarching objectives of the prior Lawndale General Plan, the Lawndale General Plan Update, and other relevant local and regional planning frameworks.

Aesthetics

Appendix G of the CEQA Guidelines distinguishes aesthetic impacts in non-urbanized areas from those in urbanized areas. For non-urbanized settings, a project is evaluated based on its potential to degrade the existing visual character or quality of public views of the site and its surroundings. In contrast, for urban settings, the evaluation focuses on whether the project would conflict with applicable zoning and other regulations governing scenic quality.

As the project would occur within an urbanized area, the Draft EIR appropriately analyzes the project's potential for impact based on zoning/regulation conflicts. To ensure a comprehensive analysis, the Draft EIR includes a detailed evaluation of potential visual changes caused by the introduction of the project. This assessment uses the Federal Highway Administration's (FHWA) methodology for evaluating visual quality, based on three criteria: vividness (the memorability of the landscape), intactness (the extent to which the landscape is free from visual intrusions), and unity (the coherence and harmony of the landscape).

As described in Section 3.3, Aesthetics of the Draft EIR, the project corridor is already highly urbanized, with a mix of residential, industrial, and commercial land uses, as well as the existing freight rail infrastructure. There are no designated scenic vistas or notable natural landscapes within the project's vicinity. Due to existing development and infrastructure, the existing visual quality in the area is generally low for vividness, intactness, and unity.

As described in Section 3.3-4.3.2, although at each key viewpoint the project would introduce permanent visual changes, the changes would be neutral as they would not degrade the existing visual quality. The project elements, including the structures, stations, and soundwalls, would be designed to reflect and complement the surrounding communities and to minimize visual intrusion. For example, fencing and soundwalls would be visually integrated to reduce contrast, and station architecture

retaining walls, and other infrastructure would incorporate design treatments that reduce visual massing and enhance overall compatibility with the existing visual landscape.

Consistent with the Metro Tree Preservation Policy, Metro would preserve existing trees along the corridor where feasible and replace trees at a minimum of a 2:1 ratio where preservation is not feasible. For heritage trees, the replacement ratio is 4:1. In addition, new trees and landscaping would be incorporated along the corridor to enhance visual quality. These elements would provide greenery and soften the appearance of the new infrastructure and contribute positively to the visual character of the corridor. The Metro Tree Preservation Policy has been incorporated as a project feature into this Final EIR as PF-BIO-1. Metro Tree Policy.

Moreover, the project is not anticipated to conflict with any local zoning or other policies governing scenic quality. Metro's commitment to thoughtful, high-quality design would help ensure that the project remains visually compatible with surrounding neighborhoods.

In summary, while the project would introduce new transit infrastructure, the visual impact analysis confirms that these changes would not degrade the existing visual character or quality of the community.

5.2-11 MR-11: Traffic Delay and Level-of-Service

Level of Service

Some commenters expressed concerns regarding the adequacy of traffic analysis, specifically related to potential traffic delays at intersections. Specific concerns included changes in roadway configurations, shifts in traffic patterns from vehicles accessing the Metro light rail stations, the introduction of new traffic signals (particularly under the Hawthorne Option), and increased delays for the Elevated/At-Grade Alignment on 170th and 182nd Streets due to proposed at-grade light rail crossings and extended railroad safety gate down times, as well as increased pedestrian crossings and associated impacts.

As explained on Page 3.1-3 of the Draft EIR, traffic congestion or delay (often measured by level of service, or LOS) is no longer considered a significant environmental impact under CEQA. Instead, CEQA now focuses on VMT to assess transportation impacts (see Pub. Resources Code, Section 21099(b)(1) and CEQA Guidelines, Section 15064.3). The rationale for this shift is that LOS analyses primarily measure congestion and delay from the perspective of drivers, which could lead to projects that promote vehicle use over more sustainable alternatives like transit, biking, and walking. By contrast, VMT focuses on reducing the number of miles driven by vehicles, promoting projects that align with California's goals of reducing greenhouse gas emissions, improving air quality, and promoting active transportation.

Although LOS is no longer used in CEQA to determine environmental impacts, Metro separately published the 2023 Transportation Detail Report[6] to analyze local traffic conditions. This report describes present traffic conditions, evaluates future conditions with and without the project, and assesses how the Elevated/At-Grade Alignment, the Trench Option, and the Hawthorne Option would affect traffic circulation, bus route integration and public on-street parking. These issues were studied to ensure the project design takes into consideration local traffic operations, road safety, and access for emergency services, regardless of CEQA requirements.

[6] The Transportation Detail Report (2023e) is available in the "Project Filing Cabinet" on Metro's website for the C Line Extension to Torrance: C Line Extension to Torrance - LA Metro

Traffic Delays

Hawthorne Boulevard serves as a major regional arterial and carries approximately 70,000 vehicle trips per day. Some comments related to the Hawthorne Option raised concerns about intersection operations along the segment of Hawthorne Boulevard between Redondo Beach Boulevard and 182nd Street, where additional traffic signals and roadway modifications are proposed. Primary changes proposed to the streets for the Hawthorne Option include:

- Modification to left turn lanes on Hawthorne Boulevard from 164th Street through 186th Street to accommodate support columns for the elevated light rail structure.
- Signalization of the intersection of Hawthorne Boulevard and 164th Street.
- Installation of a new mid-block crossing approximately 360 feet south of Artesia Blvd to provide access to proposed station.
- Reduction of the northbound left turn pockets on Hawthorne Boulevard at 177th Street from two turn lanes to one turn lane.
- Signalization of the intersection of Hawthorne Boulevard and 179th Street.
- Closure of the median at Hawthorne Boulevard and 180th Street to prevent unsafe left turns, which would permanently detour to 179th Street (northbound) or 182nd Street (southbound) to reverse direction.

Commenters generally opposed the addition of new signals and left-turn modifications based on the concern that these changes would increase vehicle delays in the area. In particular, several comments cited the proposed reduction from two to one northbound left-turn lanes from Hawthorne Boulevard onto westbound Artesia Boulevard as a potential source of congestion.

All of these Hawthorne Option-related changes to traffic operations at signalized and unsignalized intersections are addressed in the 2023 Transportation Detail Report. That analysis used a detailed transportation microsimulation model to analyze changes to automobile traffic on roadways to provide detailed LOS and vehicle queueing metrics. The 2023 Transportation Detail Report used forecast peak hour traffic volumes, which is customary for traffic studies, and accounted for potential traffic rerouting resulting from the Hawthorne Option's modifications to the median access.

The analysis concluded that, at major intersections, average delay would generally increase compared to the 2042 No Project scenario. At some intersections, vehicle queues may also increase. The location of the most substantial increase was the northbound left-turn queue at Hawthorne Boulevard and 179th Street. The increase in queues is caused by the closure of the median at 180th Street, which causes some northbound turn volumes to divert to 179th Street, which would become a signalized intersection. Similarly, queues would increase at the southbound left turn lane at 182nd Street as a result of the 180th Street median closure. At most other intersections, vehicle queues would either increase or decrease by a proportionate number of vehicles, depending on where traffic shifts occur.

Some commenters opposed the proposed new traffic signals and crosswalks intended to improve access to the proposed station area on Hawthorne Boulevard, south of Artesia Boulevard. Currently, the distance between pedestrian crossings near the South Bay Galleria is over 1,000 feet (between Artesia Boulevard and 177th Street). The proposed pedestrian improvements would reduce this gap and improve safety and accessibility. Signal spacing of less than 360 feet is not uncommon in Los Angeles County, including other segments of Hawthorne Boulevard north of 162nd Street. Moreover, the proposed signals, including the proposed mid-block pedestrian crossing at the South Bay Galleria Station, could be integrated into the existing traffic signal coordination system that regulates vehicle

flow on Hawthorne Boulevard. This signal coordination would help maintain vehicle flow and reduce potential delays, while also ensuring that the crossing remains clear of vehicles for safe pedestrian crossing.

Left-turn queues are managed through a combination of available storage space (such as lane and turn pocket lengths) and traffic signal timing. Signal timing and phasing could be adjusted over time in response to evolving traffic patterns, helping to ensure that left-turn queues do not exceed the available storage space between signal cycles. This operational flexibility allows for efficient traffic management and minimizes potential congestion at intersections.

Parking Loss

Some comments raised concerns about the potential loss of parking along Hawthorne Boulevard under the Hawthorne Option. The 2023 Transportation Detail Report identifies approximately 20 median parking spaces that would be lost to accommodate the columns for the elevated light rail structure within the City of Lawndale. Within the City of Torrance, the Hawthorne Option would require widening a segment of Hawthorne Boulevard between 175th Street and 179th Street (and narrowing the parallel frontage road) which would result in the loss of approximately 12 overnight parking spaces. These changes are limited in scope and are necessary to accommodate the elevated structure within the existing public right-of-way and avoid acquisition of private properties.

5.2-12 MR-12: Emergency Access

Some comments asserted that the at-grade crossings along the Metro ROW would be blocked too frequently by passing trains, potentially leading to delays in emergency response. It is important to note that the only light rail alignment evaluated in the Draft EIR that includes at-grade light rail crossings is the Elevated/At-Grade Alignment. The light rail system under the Trench Option, the Hawthorne Option, and the LPA would all be fully grade-separated and would not include any new at-grade light rail crossings.

As noted on page 3.1-58 of the Draft EIR, the Elevated/At-Grade Alignment would include two at-grade crossings at 170th Street and 182nd Street, which would have gates that temporarily lower when a train passes. These gate-down events would typically last between one and two minutes for light rail. As discussed in Section 3.1-4.4.2 of the Draft EIR, during these gate-down events, emergency responders could either wait briefly or reroute to the next available crossing. Under CEQA, the threshold for determining a significant impact is whether the project would result in inadequate emergency access, not merely temporary delays. Occasional short-term delays at crossings do not rise to the level of a significant environmental impact.

Emergency response times are influenced by many factors beyond just the road network, such as the location of emergency responders, traffic conditions, and the nature of the emergency. Even if an emergency required crossing the Metro ROW, not every emergency would require crossing the tracks at an at-grade light rail crossing, and not every emergency vehicle would encounter a passing train during a response.

Although the Elevated/At-Grade Alignment would increase the frequency of gate-down events relative to existing freight service, this situation is common in Los Angeles County where emergency responders have adapted effectively to the introduction of at-grade light rail crossings. For example, in Lawndale, seven at-grade freight crossings currently experience gate-down times with existing freight operations, and local emergency responders have developed practices and training for maintaining effective response times when a crossing is briefly blocked.

Metro's experience in other parts of Los Angeles County further confirms that new at-grade crossings do not cause significant emergency access issues. For example, Los Angeles Fire Department Station 59, located less than 2,000 feet from the at-grade crossing of the Metro E Line on Barrington Avenue, reported average EMS response times of 4:26 before the line opened in 2016 and 4:25 at peak ridership in 2019.[7] Non-EMS response times also remained consistent, with only minor variations (10 or less seconds) across years.

The geographic context of the 170th and 182nd Street crossings, which are located near jurisdictional boundaries (Lawndale/Redondo Beach and Redondo Beach/Torrance) also supports the conclusion that the Elevated/At-Grade Alignment would not compromise emergency access. The crossing at 170th Street is located approximately 550 feet to the east of the border between Lawndale and Redondo Beach. Lawndale is served by the Los Angeles County Fire Department, while Redondo Beach is served by its own fire department. As a result, first responders from these two departments would likely approach from opposite directions on either side of the grade crossing and would not typically need to cross at 170th Street. Additionally, the nearest Los Angeles County Fire Department stations to the City of Lawndale are located to the north, where there is ample time for firefighters to select alternative routes that avoid the grade crossing on 170th and reach the southwestern area of the City of Lawndale.

Similarly, the Elevated/At-Grade Alignment's proposed 182nd Street at-grade light rail crossing is located near the border of the City of Redondo Beach and the City of Torrance, which are served by different emergency responders. The City of Torrance is located entirely to the east of the grade crossing, so the Torrance Fire Department would not need to cross the grade crossing, and there would be a limited area of the City of Redondo Beach that would require that city's fire department to cross at the grade crossing or use an alternative route.

In summary, while occasional delays at the two proposed at-grade light rail crossings for the Elevated/At-Grade Alignment may occur, the frequency and duration of gate-down events are expected to be minimal. Emergency responders are experienced in managing such conditions and have the ability to reroute if necessary. The introduction of light rail is not expected to result in inadequate emergency access, as the project would preserve sufficient crossing options to maintain access and ensure timely emergency response.

As previously noted, the Trench Option and LPA would grade separate light rail at 170th Street and 182nd Street, eliminating any new at-grade crossings for light rail at these intersections. The Hawthorne Option also fully grade separates light rail.

5.2-13 MR-13: Soil Stability and Sinkholes

Some commenters expressed concerns about the stability of the soils within the Metro ROW, with some commenters referencing a reported sinkhole near Grant Avenue in Redondo Beach and attributing it to maintenance activities conducted by an owner of underground utilities. According to the utility owner, this sinkhole was the result of a broken irrigation line in a residential flower bed and was a localized issue that has since been repaired. Although Metro cannot independently confirm the exact cause, available information suggests it was unrelated to underlying geologic conditions. Sinkholes could occur naturally in areas with collapsible soils, or as a result of human activities that alter soil stability, such as leaking utilities or poor drainage. Factors such as inadequate engineering, poor construction techniques, or alterations to soil compaction and groundwater conditions could also contribute to their formation.

[7] Published response time data for City of Los Angeles Fire Department is available at lafd.org.

Section 3.8, Geology, Soils, and Paleontological Resources, of the Draft EIR describes the types of soils and geologic conditions present within the project area. These conditions are typical of much of Los Angeles County and do not indicate unusual risks. As discussed in Sections 3.8-3.11 and 3.8-3.12, there is a low potential for issues related to soil expansion, subsidence, or settlement. In response to public comments, as shown in Section 4.12 of Chapter 4, Corrections and Additions, of the Final EIR, Section 3.8 of the Draft EIR has been revised to further clarify that the likelihood of encountering collapsible soils, which are those most susceptible to sinkhole formation, is also low.

Whether soil is considered collapsible depends on the types of sand and silt particles that are present and their structure. Naturally occurring collapsible soils consist of sand and silt sized particles arranged in a loose "honeycomb" structure held together by weak bonds, such as clay, calcium carbonate, or capillary suction (Caltrans 2024). These bonds generally have enough strength to support loads, but they could weaken and collapse when water is introduced. Water sources could include changes in groundwater level, leaks from nearby pipelines, and rainwater.

A review of existing geotechnical data, including prior studies and available subsurface investigations, such as a boring near Artesia Boulevard, indicates a low potential for naturally occurring collapsible soils within the project area. This conclusion is supported by findings in the City of Lawndale's General Plan (Lawndale 2023) and the City of Redondo Beach's General Plan Program EIR (Redondo Beach 2024), both of which identify a low likelihood of collapsible soils in their respective jurisdictions. Data from the boring near Artesia Boulevard suggests that the subsurface soils predominantly consist of sands with minor layers of silty clays. These soils are medium dense near the surface and become more compact with depth, meaning they generally do not exhibit characteristics of loose soils. However, the soil's potential for collapsibility would be verified during the preliminary engineering phase of design through site-specific field investigations. At the time of the boring, groundwater was encountered at 77 feet below the surface, a depth that is unlikely to pose stability issues.

As outlined in Section 3.8-2.5 of the Draft EIR, the project includes Project Feature PF-GEO-1 (Metro Geotechnical Design Standards) to ensure compliance with established engineering and safety criteria, including the Metro Rail Design Criteria (MRDC), as well as Caltrans and the California Building Code's design criteria for bridges, aerial structures, and building structures. Collectively, these standards provide a rigorous framework for evaluating and addressing site-specific geotechnical conditions to ensure both temporary and long-term stability and safety.

The MRDC establishes detailed requirements for geotechnical investigations and design integration throughout the design and construction process. Specifically, Section 5.6 of the MRDC outlines methodologies for evaluating subsurface hazards and addressing potential risks such as settlement, soil instability, and liquefaction. Required geotechnical investigations would include pre-construction site-specific assessments, such as borings and laboratory testing, to characterize soil strength, composition, and consistency, and to evaluate potential impacts from groundwater. The resulting geotechnical report would identify soil types and engineering properties, establish design parameters, and include recommendations to proactively address potential risks. The recommendations of the geotechnical report would be directly incorporated into the project's plans and contractor's specifications, ensuring that the final design adequately addresses subsurface conditions and geotechnical hazards throughout the project's lifecycle. In addition, the project would be designed to minimize permanent changes to subsurface drainage and groundwater conditions, further reducing the potential for soil-related impacts.

For collapsible soils in particular, Metro would conduct site-specific field investigations prior to construction to assess whether such soils are present. These investigations would include identifying perched or static groundwater water; visually inspecting for "honeycomb" soil structure or cementation;

and laboratory testing for collapsibility. If collapsible soils are identified, the design team would evaluate their depth and lateral extent, evaluate the potential for future wetting, and estimate the potential collapse settlement under anticipated loading conditions. This information would be used to inform final engineering design and ensure that any risks are effectively addressed so that the project remains structurally stable over time. Design strategies could include soil stabilization, the use of artificial fill, deep foundations, and enhanced drainage measures.

During construction, Metro would implement a range of construction techniques tailored to the site-specific conditions to ensure that soils are stabilized and groundwater is properly managed. These methods, required by Metro's Baseline Specifications, could include the following:

> Proper earthwork methods would provide compacted soil beneath any foundations to ensure the finished condition would remain stable during operations. This requires the removal and replacement of poor soils with proper fill, under the discretion of qualified inspection personnel.

> For areas with deeper excavation (such as the trenches for the Trench Option and LPA), construction techniques include sloping or benching the excavation, and shoring trench walls with support to avoid unstable soils during the construction phase. Construction methods for any structures would be chosen during the design phase based on soil type, such as using deeper foundation methods for areas where collapsible soils may be present.

> Appropriate construction methodologies would be selected that minimize permanent changes to sub-surface drainage conditions or groundwater pressures. This could include installation of dewatering wells outside trench walls, sump pumps within the trench, and deep secant pile walls to minimize excavation base instability, soil heaving on the upgradient side of the trench, fluidization, and erosion.

> Soil settlement may be monitored during construction of embankments, to ensure proposed fill is settled before construction of tracks or other settlement-sensitive structures.

In addition, the MRDC and associated Metro Supplemental Seismic Design Criteria (SSDC) provide specific criteria for ensuring that slopes, embankments, and aerial guideways are designed to prevent long-term deformation or failure, including the evaluation of seismic events. These standards provide methods to limit lateral deformation, manage groundwater levels, and prevent settlement-related impacts under normal and seismic conditions.

In summary, the soils within the project area present a low risk for naturally occurring sinkholes, and Metro would apply established geotechnical standards and construction practices to prevent sinkhole formation and other stability-related concerns.

Lastly, some commenters asserted that the Draft EIR is deficient because full geotechnical investigations were not undertaken prior to its preparation. Under CEQA, environmental review is typically conducted at a level of detail commensurate with the planning phase of the project. Conducting full geotechnical investigations prior to project approval would be premature and impractical. Detailed site-specific work, such as borings, laboratory soil testing, and groundwater monitoring, is closely tied to the final design and construction methods, which are not completed until after project approval. These investigations are resource-intensive and must be scoped according to specific engineering requirements that emerge later in project development. For CEQA purposes, Metro appropriately relies on existing geotechnical data, prior studies, and established regional soil profiles to evaluate the potential for geological hazards. This approach is consistent with CEQA's intent to provide a reasonable, good-faith analysis of potential impacts. Site-specific geotechnical investigations would be conducted during the next phase of

engineering to confirm subsurface conditions and ensure the project is designed in compliance with applicable safety and engineering standards.

5.2-14 MR-14: Property Values and Impacts to Businesses

Some commenters expressed concerns over the potential for a decrease in property values as a result of the proximity of the project, and potential impacts to businesses during construction.

CEQA does not require an evaluation of changes to property values and the direct economic effects of a proposed project (Pub. Resources Code, Section 21080(e)(2), 21082.2(c), CEQA Guidelines, Sections 15064(e), 15131). CEQA is focused on environmental impacts, and fluctuations in property values are considered social and economic issues, which generally fall outside of the scope of environmental analysis under CEQA.

However, multiple studies (Shankar, P., Young, L., Haas, P., & Esling, P., 2019; Noh, Y., & Li, W., 2024; Rennert, L., 2022) have shown that residential and commercial properties located within a half-mile radius of transit stations tend to experience increased property values. This is typically attributed to the enhanced accessibility provided by transit systems, offering greater access to destinations, such as employment centers, schools, and entertainment hubs. Proximity to transit stations tends to improve community livability by fostering accessibility, which is increasingly valued in residential markets.

Regarding property acquisition, the light rail alignment options and alternatives studied in the Draft EIR, including the LPA, were designed to minimize the need to acquire property as much as possible and avoid displacement of residents. If the Metro Board votes to certify the Final EIR and approve an alignment for implementation, Metro will finalize the list of any properties that may need to be acquired for the selected alignment and will begin outreach with property owners to discuss real estate needs.

Metro is also committed to helping small businesses continue to operate during and after construction. Metro provides support to businesses affected by major rail projects through initiatives like the Business Interruption Fund, which helps eligible businesses cover certain operating expenses and marketing support during construction to help ensure their continued success. More information about these programs is available on the Metro website at https://www.metro.net/about/business-interruption-fund/ and https://eat-shop-play-lametro.hub.arcgis.com/.

5.2-15 MR-15: Metro Ridership Forecasting Methodology

Some commenters expressed concerns about ridership levels for the project and the overall Metro system.

As a part of the project analysis, Metro conducted a ridership analysis to forecast future ridership, travel patterns, time savings, and congestion benefits (measured as a reduction of vehicle miles traveled or "VMT"). The methodology and findings are documented in the 2023 Ridership Summary Report, published concurrently with the Draft EIR. [8]

Metro's travel demand model uses socioeconomic data from the Southern California Association of Governments (SCAG) projected for 2042. According to these forecasts, ridership for the LPA is expected to match that of the Metro ROW alignments, with about 4,690 new riders and 11,500 total project trips per day by 2042. Metro's travel demand model calculates projected ridership for a typical weekday and applies an "annualization factor" of 318 to compute annual ridership. An annualization factor of 318 corresponds to 245 days of typical weekday ridership, and 120 days of weekend/holiday ridership at

[8] The Ridership Summary Report (2023a) is available in the "Project Filing Cabinet" on Metro's website for the C Line Extension to Torrance: C Line Extension to Torrance - LA Metro

around 60% of weekday ridership. Ridership projections show that riders from the greater South Bay and Palos Verdes Peninsula would use the system to connect to the regional rail network.

The model also accounts for telecommuting, which has been on the rise, and accelerated during the COVID-19 pandemic. Metro conducted preliminary testing using SCAG's Activity Based Model (ABM) to understand and predict telecommuting trends and found that the number of telecommuters is expected to be smaller than originally predicted. This is likely attributable to the fact that many industries cannot support a large fraction of telework.

Metro is seeing trends that indicate many transit riders do not have the option to telework, which suggests that transit ridership will continue to recover and grow as telework trends stabilize. Since ridership levels dropped during COVID-19 in 2020, Metro's ridership has increased in the last few years. In February 2025, Metro reported 311 million boardings in 2024, an 8% increase over 2023 annual ridership numbers and the first time the agency has reached this level of ridership since before Covid-19 pandemic. Metro will continue to study telecommuting and ridership data to inform the project and ensure that ridership trends are appropriately reflected in future analyses.

5.2-16 MR-16: Response to Lawndale and Redondo Beach Community Letter

Some commenters from Lawndale and Redondo Beach submitted the same form letter that expressed a preference for the Hawthorne Option and concerns regarding the Metro ROW alignments.

The letter included comments on the following topics, and responses to each are provided below.

1 – **Opposition to Metro ROW Alignments.** The commenter's opposition to the Metro ROW alignments and preference for the Hawthorne Option is noted. In May 2024, the Metro Board selected the Draft EIR's 170th/182nd Grade-Separated Light Rail Transit Alternative (also known as the "Hybrid Alternative") as the LPA. The Hybrid Alternative was identified as the LPA based on a comprehensive evaluation of all options, including considerations of community impacts, travel benefits, costs, and ability to meet the project's objectives. The Metro Board will make a final decision on the project alignment following the completion of the Final EIR. This decision will consider the Final EIR's findings, including all public comments received and the responses provided.

2 – **Neighborhood Quality of Life.** The commenter's concern about potential impacts to neighborhood quality of life are noted. Metro acknowledges that introduction of a light rail system to residential areas may bring changes to the surrounding environment, including increased noise and vibration. As disclosed in the Draft EIR, significant and unavoidable noise and vibration impacts are anticipated during construction for all rail alignments. However, Metro would implement every feasible mitigation measure to minimize these impacts to the maximum extent feasible. During operation, with implementation of mitigation measures, noise and vibration levels for the LPA, Trench Option and Hawthorne Option would be reduced to less than significant. For additional information regarding these topics, see Major Topic Responses MR-5: Vibration Impact Types and Impact Thresholds, and MR-10: Changes in Community Character.

3 –**Proximity of Realigned Freight Track to Residences.** As part of the Metro ROW alignment options, Metro would realign the existing freight track in specific segments of the corridor to accommodate two new light rail tracks and ensure that the overall design meets safety standards.

Freight derailment risk is very low, and the project would not increase the risk of derailment. See MR-8: Light Rail and Freight Train Safety. As part of the project, Metro would rebuild existing freight tracks in several areas throughout the corridor, upgrading them to meet modern engineering and safety

standards, and would implement other safety features such as fencing and crossing improvements that would enhance the overall safety along the corridor.

The project's design is informed by FRA and Metro standards and criteria for parallel track operations, including appropriate track spacing to ensure an adequate and safe distance between freight and light rail along the corridor. Tracks would be spaced to minimize the potential for any interference between the freight and light rail operations, allow sufficient room for the installation of safety barriers, and provide buffer zones to help contain any unlikely incidents, such as a minor derailment within the Metro ROW. The spacing would take into account train speeds, freight types, and site-specific conditions.

In addition, communication protocols between freight operators and Metro would be established to ensure rapid response and efficient management in the unlikely event of a derailment. Metro would also coordinate directly with local emergency responders and provide them with real-time information to ensure that they are prepared to act quickly. This coordination would include regular communications and training.

Metro will continue to prioritize community safety as the project advances through design and implementation. For additional information on this topic, see MR-8: Light Rail and Freight Train Safety.

4 – **Utility Relocation and Hazard Risks.** The existing utilities, including high-pressure petroleum pipelines within the Metro ROW, would either be protected in place or relocated, following stringent safety protocols and engineering standards. During the next design phases, detailed geotechnical assessments would be conducted to evaluate soil conditions thoroughly, including potential stability issues that could affect utility safety. These evaluations would guide the implementation of specific construction techniques, such as shoring, protective barriers, and stabilization methods, to ensure that construction activities do not compromise pipeline integrity.

The project would follow applicable safety regulations and standards for utility protection, and Metro and its contractors would coordinate with utility owners to comply with all operational and safety requirements to minimize risks during construction and ensure that pipelines are adequately protected after the project becomes operational.

For additional information on these topics, see MR-7: Utility Relocation and Hazardous Material Safety, and MR-13: Soil Stability and Sinkholes.

5 – **Metro ROW.** The Metro ROW is an active freight corridor and is not designated as public green space or authorized for recreational use. Some residents have used parts of the Metro ROW informally for recreation, which is not consistent with freight safety standards and is prohibited due to the risk associated with proximity to an active rail corridor.

To enhance safety and mitigate noise impacts, the project would include new or upgraded security fencing and soundwalls along the light rail tracks. These soundwalls, discussed in Section 3.6, Noise and Vibration, of the Draft EIR, would be designed to meet light rail and freight rail safety standards while reducing potential noise impacts on nearby residences. The exact height and material of the soundwalls would be finalized in later design phases and would feature aesthetic treatments to help minimize their visual impact and blend with the surrounding environment, as described in Section 3.3, Aesthetics, of the Draft EIR.

To further support recreational opportunities, the project would include multi-use recreational paths along Condon Avenue in the City of Lawndale and between Grant Avenue and 182nd Street in the City of Redondo Beach. The new paths would improve mobility within the neighborhoods where no sidewalks exist today, and provide safe, designated areas for walking, biking, and other activities. Pursuant to

Metro's Tree Policy (2022b), trees would be preserved where feasible and replaced at a ratio of 2:1 (or 4:1 if the tree is considered a heritage tree). Additionally, new landscaping, shade trees, and other design elements would be introduced to enhance the natural character of the corridor and support a unified, visually appealing environment. Metro's Tree Policy has been incorporated into this Final EIR as Project Feature PF-BIO-1. Metro Tree Policy.

For additional information, see MR-10: Changes to Community Character.

6 – **Hawthorne Option Ridership Benefits.** Concurrent with the Draft EIR, Metro published the 2023 Ridership Summary Report, which analyzes travel benefits of the routes studied in the Draft EIR (Metro ROW and Hawthorne Boulevard). The Hawthorne Option was projected to have higher total project trips and new riders. However, the Metro ROW alignments had greater reductions in VMT and higher travel time savings per trip. Metro analyzed these benefits in combination with construction cost estimates to better understand cost effectiveness. The project objectives, as stated in the Draft EIR, include improving mobility in the South Bay and delivering a cost-effective project. The travel benefit-to-cost analysis found that the Elevated/At-Grade Alignment and LPA performed better than the Hawthorne Option and Trench Option. See summary table below, which was provided to the Metro Board in the April and May 2024 Board Reports during the selection of the LPA.

Comparison	Metro ROW (Elevated/ At-Grade)	Trench Option (ROW)	Hybrid Alt (ROW)	Hawthorne Option	High Frequency Bus Alt
Annual Project Trips	~3.68M	~3.68M	~3.68M	~4.96M	~1.29M
Annual New Riders	~1.49M	~1.49M	~1.49M	~1.74M	~396K
Annual VMT Reduction	~19.51M	~19.51M	~19.51M	~19.39M	~2.28M
Travel Time Savings/Trip (minutes)	22	22	22	19.7	18.2
Cost/ Annual New Riders	$1,318	$1,905	$1,497	$1,695	$338
Cost/ Annual Project Trips	$534	$772	$607	$595	$103
Cost/Annual VMT Reduced	$101	$146	$115	$153	$59

Source: Metro (2024)

As noted in the May 23, 2024, Metro Board Report,[9] where the Metro Board voted to select the LPA, the Hawthorne Option presents several challenges for construction and implementation. It would require encroachment into Caltrans ROW and additional federal environmental clearance under the National Environmental Policy Act (NEPA), which could extend the project schedule by two to four years. Construction along Hawthorne Boulevard, which is a major regional thoroughfare with approximately 70,000 daily trips, would include lane closures and parking loss, which would exacerbate existing traffic congestion locally and across the South Bay during an extended five-to-seven-year construction period.

Approximately 170 commercial properties abut the Hawthorne Option, which serve approximately 350 businesses. The Hawthorne Option would require the greatest number of property acquisitions and result in the highest number of business displacements among the options studied. As identified in the

[9] The relevant Board Report for the May 23, 2024 Metro Board Meeting is available at: https://metro.legistar.com/LegislationDetail.aspx?ID=6699075&GUID=B590F488-8363-4FE1-A9F2-93D0EB80DFEF&Options=&Search= (accessed October 31, 2024).

2023 Real Estate Acquisitions Report, the Hawthorne Option would require permanent full acquisition of seven commercial parcels and permanent partial acquisition of five commercial parcels north of 190th Street. Major utility relocations would also be required, including relocation of a major underground storm drain located beneath Hawthorne Boulevard, which would require lane closures to construct. In addition, the Hawthorne Option would require the potential relocation or elevation of high-voltage overhead transmission lines that traverse the corridor. These factors contribute to the Hawthorne Option's estimated construction cost of $2.96 billion (as estimated in 2022), the highest of the alignment options studied.

Further, the Hawthorne Option would not include enhancements proposed along the existing Metro ROW, such as freight noise, vibration, and safety enhancements or the new neighborhood multi-use paths. It would also not provide a direct connection to the new Redondo Beach Transit Center, located a half-mile away. By contrast, the LPA provides a more balanced and cost-effective solution that still meets the project's objectives, ridership goals and community and environmental priorities.

The LPA is projected to attract about 4,690 new riders and 11,500 total daily project trips a day by 2042 (which also applies to the Elevated/At-Grade Alignment and Trench Option). Because construction would be staged within the existing Metro ROW, the LPA would require minimal property acquisitions in the segment north of 190th Street, with up to four non-residential parcels identified for permanent full acquisitions to locate a TPSS. Like the other alignments studied, the LPA is designed to avoid the displacement of residents. Further, the LPA's projected cost of $2.23 billion, as estimated in 2022, is significantly lower ($730 million less) than that of the Hawthorne Option.

Relative to the Elevated/At-Grade Alignment, the LPA's under-crossings at 170th and 182nd Streets would eliminate long-term operational noise impacts, facilitate uninterrupted emergency response, enhance safety along school routes, and create a fully grade-separated light rail line for improved operational efficiency.

The Metro Board will make a final determination on the project alignment after reviewing the Final EIR and considering all public comments, including those submitted on the Draft EIR and the responses provided in the Final EIR.

7 – **Long-Term Planning.** Metro acknowledges the commenter's concerns and the importance of considering both financial and non-financial costs, such as community and environmental impacts, in selecting the best option for the Metro C Line Extension. In selecting the Hybrid Alternative as the LPA, the Metro Board considered multiple factors, including the environmental impacts presented in the Draft EIR, the extensive community input, the long-term benefits of each option, and the estimated construction costs.

Metro recognizes the permanent nature of this project and its potential to shape the community for generations. The Metro Board will continue to carefully weigh all relevant factors as they review the Final EIR and make a final decision on whether to certify the Final EIR and approve one of the alignment options under consideration.

5.2-17 MR-17: Response to Torrance Community Letter

Some commenters from Torrance submitted the same form letter that expressed a preference for the use of the Metro ROW for the project.

The letter included comments on the following topics, and responses to each are provided below.

1 – Benefits of the ROW Alternative. The commenter notes the benefits of the Elevated/At-Grade Alignment, including lower costs, shorter construction time, reduced traffic impacts to Hawthorne

Boulevard, and the benefit of connecting the transit centers in Redondo Beach and Torrance. Following the close of the public comment period on the Draft EIR, the Metro Board selected the Draft EIR's 170th/182nd Grade-Separated Light Rail Transit Alternative (also referred to as the "Hybrid Alternative") as the LPA. As detailed in this Final EIR, the LPA would have similar benefits and impacts as the Elevated/At-Grade Alignment, including direct connections between the transit centers. The LPA is similar to the Trench Option in that it minimizes potential noise impacts through the elimination of the at-grade light rail crossings at 170th and 182nd Streets with two short trenches. When the Metro Board considers certification of the Final EIR, it will further evaluate the environmental and community impacts of the LPA to make a final determination on project approval. The comments related to economic and cultural benefits do not raise any significant environmental issues requiring a response.

2 – Impacts along Hawthorne Boulevard. The commenter expresses concern regarding potential impacts of the Hawthorne Option, including disturbance to neighborhoods, impacts to businesses, and possible use of eminent domain. The Draft EIR and other analysis performed for the project recognize that the Hawthorne Option would involve construction impacts along a busy commercial corridor and regional throughfare, which has approximately 70,000 daily vehicle trips. Construction of the elevated light rail structure would require lane closures during construction, which would affect traffic flow and result in potential disruptions to businesses. Approximately 170 commercial properties support approximately 350 businesses, which abut the project alignment along Hawthorne Boulevard. The Hawthorne Option would require the permanent acquisition of several commercial properties along Hawthorne Boulevard, including gas stations, auto repair shops, self-storage, furniture store, and auto dealerships, to accommodate the elevated alignment and stage construction. The Hawthorne Option also requires some temporary construction easements that would affect businesses, including an auto dealership, to construct the support structures for the elevated structure. Metro follows and prioritizes negotiations with property owners to reach fair purchase agreements; exercise of eminent domain is only considered as a last resort when an agreement cannot be reached.

Compared to the Hawthorne Option, the alignment options along the Metro ROW, including the LPA, minimize permanent property acquisition needs by utilizing the ROW corridor for construction and operations. The Metro ROW alignments would avoid the potential permanent acquisition of commercial properties along Hawthorne Boulevard.

3 – Ridership Considerations. The commenter emphasizes the importance of ridership from Torrance and suggests that this contribution should weigh in favor of the Metro ROW alignments. The ridership projections set forth in the 2023 Ridership Summary Report estimate average weekday boardings in the year 2042. While the Hawthorne Option showed higher estimated project trips than the ROW alignments, it was found to be less cost-effective when ridership benefits were evaluated in relation to construction costs. Ridership and cost-effectiveness are among the many factors that the Metro Board will consider when making a final decision on project approval.

5.2-18 MR-18: Homelessness

Some commenters expressed concerns about the presence of unhoused individuals on Metro's train system. Social and economic impacts are outside CEQA's purview; this major topic response is provided for informational purposes. Metro is committed to providing a safe, clean, and welcoming transit experience for all riders, and has developed programs to address homelessness on the system. In 2018, Metro's Board of Directors voted to fund Homeless Outreach Teams to engage with unhoused riders and connect them to resources and supportive services. These multidisciplinary teams are part of Metro's broader public safety strategy, which also includes Metro Ambassadors, law enforcement partners, security personnel, and cleaning crews.

Since that time, Metro has tripled the number of homeless outreach staff and expanded service delivery in partnership with the Los Angeles Department of Health Services and key community-based organizations. These Homeless Outreach Teams are diverse and come from the communities Metro serves. They are experienced in engaging people experiencing homelessness, and the essential resources they provide help people find housing and other critical resources.

Importantly, Metro Homeless Outreach Teams are not security officers and do not replace existing security personnel or law enforcement. Rather, they are an added workforce that collaborates with other Metro departments in order to support a care-based safety model, improve customer experience and help make the system feel safer for our riders.

Metro Homeless Outreach Teams:

> Engage unhoused riders through a person-centered approach that builds connections and establishes trust.

> Connect individuals with a variety of services and resources through a multidisciplinary, housing-first approach.

> Place people into housing, ensuring that they no longer seek shelter on Metro's system.

Metro Homeless Outreach Teams are deployed across our bus and rail system and are easily identified in their purple Metro Outreach vests.

More information on Metro's recent response to homelessness can be found here: https://boardagendas.metro.net/board-report/2023-0683/

5.2-19 MR-19: Project Benefits

Some commenters questioned whether the project would provide any benefits to the South Bay or the region as a whole. Although CEQA does not require an EIR to discuss the benefits of a project, the following discussion is provided for informational purposes. The South Bay is a major employment hub in Los Angeles County, facing critical challenges, including congested roadways, limited transit options, and high housing costs. The affordable housing crisis exacerbates regional congestion as workers commute long distances to access jobs. According to the Southern California Association of Governments (SCAG), job growth in the region is expected to outpace population growth, further intensifying the jobs-to-housing imbalance. By 2045, congestion is projected to worsen by 30 percent, negatively impacting air quality, energy consumption, and greenhouse gas (GHG) emissions. The South Bay currently lacks fast, frequent, and reliable transit connections to the rest of Los Angeles County, limiting access to jobs, services, and key destinations. The project addresses these challenges by offering an efficient transit solution that would benefit the South Bay and the entire county through:

> Expanding access to opportunities with ~3.6 million project boardings per year

> Attracting ~1.5 million new riders to the Metro system,

> Generating over 15,000 jobs (8,600 construction and 6,400 non-construction),

> Reducing travel times across the region,

> Connecting two new bus transit centers to the expanding rail network,

> Helping address climate change by shifting drivers to transit and reducing:

- Auto travel/congestion: ~19.5 million vehicle miles traveled per year,
- GHG emissions: ~2,370 metric tons of CO_2 equivalent per year,

- Regional energy use: ~41 million megajoules per year

The project would also expand mobility options in Equity Focus Communities (EFCs), which are areas identified by Metro as having the greatest transportation needs based on three characteristics:

> Low-income households,

> Black, Indigenous, and other People of Color (BIPOC) residents, and

> Households with no access to a car.

Prioritizing transit investments in historically underserved communities is consistent with Metro's Equity Platform, which seeks to expand access to economic opportunities, improve mobility for transit-dependent riders, and reduce transportation barriers for EFCs. The project would provide reliable, high-quality transit connections in many EFCs in the South Bay and beyond, connecting the riders to major employment hubs and services, helping to address economic disparities in access to jobs, education and essential services while supporting equitable economic development and climate goals. Prioritizing jobs in disadvantaged communities strengthens local economic development in many EFCs through the creation of construction, operation, and maintenance jobs. With the recently adopted K Line operating plan, this southern extension would create significant travel time savings and improve transit frequency—benefits that would extend beyond the immediate project area, improving mobility and quality of life across Los Angeles County. Additionally, Metro has engaged in extensive public outreach to ensure that community perspectives are reflected in the project's development.

5.2-20 MR-20: Proximity Impacts of Relocated Freight Tracks

Some commenters expressed concerns regarding potential impacts related to the proximity of the relocated freight tracks to residences. The Draft EIR evaluates these proximity-related impacts, including in Sections 3.2, Aesthetics; 3.3 Air Quality and GHG; 3.4 Noise and Vibration; and 3.8 Hazards and Hazardous Materials. The following discussion summarizes, amplifies, and clarifies the findings of these analyses, and demonstrates that although minor shifts in freight track location would occur, the project would not introduce new or substantially more severe impacts from freight operations compared to existing conditions.

Aesthetics

As discussed in Section 3.3, Aesthetics, of the Draft EIR, the existing Metro ROW is characterized by transportation infrastructure, including freight operations, and at-grade freight crossings. The visual quality along the Metro ROW is low to moderately low, with no designated scenic vistas or sensitive visual resources within the area.

The analysis in Section 3.3-4.2 of the Draft EIR determined that the relocation of freight tracks would not introduce a substantial change in the corridors' visual character. Although the proximity of freight tracks to some residential and retirement communities would increase slightly, the relocated tracks would remain within the existing Metro ROW and at the same grade as the current freight line. The fundamental visual context of the corridor as an active transportation corridor, would remain unchanged. Additionally, the project includes new safety infrastructure at at-grade freight crossings, which would be visually similar to existing infrastructure and designed in accordance with applicable standards. A visual simulation (Figure 3.3-62 of the Draft EIR) provides an example of this modification, illustrating how the freight track would be relocated slightly westward while maintaining a consistent visual profile. The project would also be consistent with local policies regarding visual quality.

Because the freight track relocation would not introduce a new use or significantly change the appearance of the corridor, and because new infrastructure would be consistent with existing conditions

and applicable design policies, aesthetic impacts from the freight track realignment would be less than significant.

Air Quality

Some commenters raised concerns that relocating the freight track within the Metro ROW could increase exposure of nearby residences to air pollutants from freight operations. However, freight activity in this corridor occurs infrequently (typically one to two times a day through the residential sections), and the primary factors influencing freight-related emissions— such as train frequency, train length, and fuel type—would remain unchanged, Because the project would not increase the number or intensity of freight trips, nor alter the type of locomotives used, the associated emissions of criteria pollutants and toxic air contaminants, such as diesel particulate matter (DPM), would remain the same.

Moreover, DPM and other freight emissions disperse rapidly in outdoor environments. The minor change in distance between the freight tracks and adjacent residences is not sufficient to cause a measurable change in localized air pollutant concentrations or to meaningfully increase exposure risk for nearby residents. Soundwalls required for the project would further reduce localized exposure by acting as physical barriers that promote dispersion and reduce the accumulation of particulates near sensitive receptors. Therefore, the project would not result in a significant air quality impact related to freight relocation.

Air quality in the region is also expected to continue improving due to ongoing regulatory efforts and emission controls. The SCAQMD 2024 *South Coast Air Basin Plan for the 2012 Annual PM2.5 Standard* established an attainment target date of 2030, and monitoring data recorded at sites throughout the Los Angeles County portion of the South Coast Air Basin have demonstrated a decreasing trend over the past decade. The 2024 PM2.5 plan accounts for particulate matter emissions from freight train activity at a regional scale. The project would not introduce new freight activity and would not interfere with regional attainment efforts.

Both light rail and freight train operations generate small amounts of dust due to braking friction and resuspended particulates from trains passing over unpaved areas. However, these emissions would be minor and not substantially increase localized particulate matter concentrations along the alignment. As part of the project's mitigation measures, soundwalls would be installed along portions of the corridor where residential developments are closest to the tracks, specifically south of Manhattan Beach Boulevard and north of 190th Street. These soundwalls would act as physical barriers, helping to reduce the dispersion of airborne particulates into surrounding communities. The analysis in Section 3.4-4.3.2 was revised in Section 4.8 of Chapter 4, Corrections and Additions, of the Final EIR, to include expanded descriptions on brake dust.

For these reasons, the relocated freight tracks within the Metro ROW would not expose nearby sensitive receptors to substantial pollutant concentrations. Therefore, operational impacts related to air quality would remain less than significant.

Noise and Vibration

Section 3.6, Noise and Vibration, of the Draft EIR analyzes the noise impacts of the relocated freight track combined with the light rail, in Section 3.6-4.1.2, Operational Impacts. With implementation of Mitigation Measures MM-NOI-2, MM-NOI-3, and MM-NOI-4, all operational impacts would be reduced to less than significant for the Trench Option. For the Elevated/At-Grade Alignment, significant noise impacts would remain at the 170th Street at-grade crossing. However, this remaining significant noise impact for the Elevated/At-Grade Alignment is not attributed to the freight being in closer proximity to residences (note the freight track would only be relocated approximately three feet near the 170th

Street at-grade crossing). Instead, as discussed in Section 3.6-6.1.2 of the Draft EIR, the freight noise impact is attributed to the freight horn blowing at the at-grade crossings, rather than trains passing by. For this same reason, the LPA would not result in significant noise impacts resulting from the proximity of the freight tracks to residences.

Section 3.6, Noise and Vibration, of the Draft EIR also analyzes potential vibration impacts from the relocated freight track in Section 3.6-4.3.2, Operation Vibration Impacts. Table 3.6-24 summarizes these findings, demonstrating that, with implementation of Mitigation Measures MM-VIB-4 (Low Impact Frogs), MM-VIB-5 (Resilient Fasteners), and MM-VIB-6 (Ballast Mats), operational vibration impacts would be reduced to less than significant. It should also be noted that, where freight tracks would be relocated, Metro would install new and upgraded rail infrastructure where feasible, such as continuously welded rail; this type of rail eliminates rail joints by welding sections together, which results in smoother rail surfaces. This technology would likely reduce both noise and vibration compared to existing freight operations.

Hazards

Section 3.9, Hazards and Hazardous Materials, of the Draft EIR analyzes potential impacts related to hazardous materials, including the risk of accidental release of hazardous materials resulting from project operations. Section 3.9-4.2.1 has been revised in Section 4.13 of Chapter 4, Corrections and Additions, of the Final EIR, to further clarify that the project would not introduce any elements that could increase the risk of derailment.

Freight rail already operates safely within the Metro ROW, and the relocation of freight tracks would not alter freight operations, train frequency, or the types of materials transported. In fact, the relocated freight tracks would be rebuilt with new and upgraded track infrastructure, improving safety and reducing potential risks compared to existing conditions.

Although freight tracks would be relocated slightly closer to some residences, proximity alone does not increase the probability of derailment, nor does it necessarily result in greater risks to adjacent communities. As discussed in MR-8: Light Rail and Freight Train Safety, freight safety data indicates that the vast majority of derailments occur in railroad yards or on freight industry tracks, where frequent switching, complex maneuvers, and high train volumes increase the likelihood of incidents. By contrast, derailments along mainline freight corridors, such as the Metro ROW at issue, are rare, and injuries or fatalities are even rarer.

For additional information, see MR-8: Light Rail and Freight Train Safety.

5.2-21 MR-21: Cost Estimates and Schedule

CEQA does not require an EIR to provide cost estimates. However, in 2022 Metro prepared cost estimates and published the C Line (Green) Extension to Torrance Cost Estimates Summary10 concurrent with the Draft EIR in January 2023. As stated, Metro follows the FTA's guidelines for cost estimating, and the estimate underwent peer review prior to publication. The cost estimate is based on the advanced conceptual design available for the Draft EIR, and it includes the construction costs (which were prepared in 2022 dollars), an escalation factor to account for future inflation and market fluctuations, and a contingency to accommodate potential known and unknown risks that could increase costs during construction. In accordance with FTA guidelines, the cost estimates include multiple categories such as track guideway, stations, sitework, utility relocations, potential environmental

[10] The Cost Estimates Summary (2023c) is available in the "Project Filing Cabinet" on Metro's website for the C Line Extension to Torrance: C Line Extension to Torrance - LA Metro

investigations, right-of-way acquisitions, and systems. The contingency is approximately 40% based on the current level of design, in accordance with FTA guidelines. As the project design advances, the contingency would be adjusted.

The 2023 Cost Estimates Summary also provides the preliminary construction schedule for each of the alignment options, with the Elevated/At-Grade Alignment anticipated to be completed in Fall 2033, the Trench Option in early 2035, and the Hawthorne Option in Fall 2035. The construction schedules in the 2023 Cost Estimates Summary include contingency as part of the construction duration per FTA guidelines. In April and May 2024, Metro presented the cost estimates and construction schedule for the LPA (the Hybrid Alternative) to compare with the other alignments. The LPA is estimated to take approximately a year longer than the Elevated/At-Grade Alignment. The construction duration for the LPA reflects these adjustments and is described in Chapter 2, Description of the Locally Preferred Alternative, of the Final EIR.

Metro has refined cost estimates, posted to the project website, to share with the Metro Board as part of the consideration to approve the project and certify the Final EIR.

5.3 RESPONSES TO PUBLIC AGENCIES

Submission 21 Carlos Huizar, City of Torrance

21-1 The north arrow in Figure 2.3-13 has been revised and included in Section 4.3, Corrections and Additions, of the Final EIR. This revision does not change the conclusions of the Draft EIR. Figure 2.3-14 of the Draft EIR is labeled correctly and did not require revisions.

21-2 The City's opposition to a new pedestrian crossing on Hawthorne Boulevard to access the South Bay Galleria Station is noted. All comments have been shared with the Metro Board for their consideration. On May 23, 2024, the Metro Board of Directors selected the Hybrid Alternative, which travels along the Metro ROW for the entire length of the alignment, as the LPA. The LPA does not include a station along Hawthorne Boulevard. The selection of the LPA helps guide the next phase of design and study, but no final decision has been made. All alignment options and alternatives studied in the Draft EIR are still being considered. All comments on the Draft EIR have been provided to the Metro Board for consideration. See MR-1: Selection of Alternatives.

Both the Draft EIR and the 2023 Transportation Detail Report, which evaluates non-CEQA issues and was published concurrently with the Draft EIR, include consideration of the mid-block pedestrian crossing at the south end of the South Bay Galleria Station (Hawthorne Option). The mid-block pedestrian crossing is intended to provide safe, convenient pedestrian access to the station, particularly for residents approaching from the south and the neighborhood east of Hawthorne Boulevard, thereby supporting the project's goal of providing a viable alternative to continual growth in traffic volumes.

The project seeks to reduce the risk of unsafe crossing behavior by providing safe crossing locations as close to the station as possible. The proposed crossing would be signalized and would be located approximately 360 feet south of the existing signal at Hawthorne Boulevard and Artesia Boulevard. Without a signalized crossing at the south end of the station, transit passengers approaching the station from the south (near 177th Street) would be more likely to attempt to unsafely cross Hawthorne Boulevard because of the long distance (over 1,000 feet) between signalized crossings at Artesia Boulevard and 177th Street.

This is also supported by the analysis of vehicle-pedestrian collisions along the corridor, as shown in Figure 3.1-14 of the Draft EIR. For instance, in the segment of Hawthorne Boulevard between approximately 162nd Street and Artesia Boulevard (which has more crossings between 400 to 600 feet apart), there were far fewer collisions total than in a comparable distance from Artesia Boulevard south to 182nd Street (which has fewer crossings).

The mid-block pedestrian crossing was evaluated under the applicable CEQA transportation standards of significance, including consistency with local policies that support improved pedestrian mobility and safety (see Section 3.1-4.1 of the Draft EIR). As described in Section 3.1-1.2 of the Draft EIR and MR-11: Traffic Delay and Level-of-Service, traffic impacts as measured by delay, such as level-of-service (LOS) impacts, are no longer treated as environmental impacts under CEQA. Likewise, CEQA does not require an evaluation of parking capacity and demand. However, potential secondary effects such as parking demand and circulation changes in residential areas are discussed in the 2023 Transportation Detail Report. The mid-block signal would not "introduce new vehicle traffic"

as the signal is a pedestrian safety measure for accessing the station and would be comparable to the several mid-block pedestrian crossings found on Hawthorne Boulevard less than one mile north in the City of Lawndale. The 2023 Transportation Detail Report also found that approximately 20 on-street parking spaces would be lost in the center median of Hawthorne Boulevard between 162nd Street and 171st Street in the City of Lawndale to accommodate columns for the elevated structure.

Metro considered various options to ensure safe pedestrian access to the proposed South Bay Galleria Station in the center of Hawthorne Boulevard, including a pedestrian bridge. A pedestrian bridge was not pursued, however, for several reasons. First, the at-grade crossing with coordinated signals is expected to provide safe and efficient access without the need for elevated infrastructure. Moreover, constructing a pedestrian bridge instead of a signalized crossing could introduce additional challenges, as it would expand the project's footprint due to the support columns required for the bridge. This would likely necessitate acquiring additional private properties along Hawthorne Boulevard to accommodate the bridge structure and a ramp compliant with the Americans with Disabilities Act (ADA) for accessibility.

The comment also suggests that a pedestrian bridge would reduce parking impacts to adjacent residential streets and private parking lots. However, based on Metro's system experience, the majority of rail passengers do not drive to stations. Metro's published data from its annual On-Board Customer Satisfaction Surveys show that at nearly all stations, most riders access the train by walking, bicycling, or transferring from buses. Even at stations where parking is provided, most station parking is not fully utilized under normal circumstances. Thus, the proposed South Bay Galleria Station is expected to have a similar pattern of people accessing the station by foot, bicycle, or bus. Furthermore, owners of private parking facilities have the authority to control who parks in the spaces, determine any associated charges, and can contact enforcement if unauthorized vehicles are parked.

21-3 Regarding 177th Street: the 2023 Transportation Detail Report analyzes all anticipated changes in roadways and traffic patterns, inclusive of traffic rerouting that would result from the proposed mid-block crossing and median access modifications. For the proposed crossing associated with the Hawthorne Option, the northbound left-turn pocket on Hawthorne Boulevard approaching 177th Street would be reduced from two lanes to one. This change would be managed through a combination of increased storage space (lengthening the turn lane) and adjustments to signal timing and phasing to maintain acceptable traffic flow. Signal operations could be further adjusted as needed to respond to evolving traffic patterns and reduce the risk of queues exceeding available storage in between signal cycles.

The Metro ROW alignments, including the LPA, do not include modifications to the 177th Street/Hawthorne Boulevard intersection as the alignments would be located along the Metro ROW.

21-4 Regarding 179th Street: As discussed in Section 3.1-4.3 of the Draft EIR, under the Hawthorne Option, a new traffic signal is proposed at 179th Street to facilitate safe vehicle turns and pedestrian access, as the location is presently unsignalized. This improvement would help accommodate traffic that would otherwise make left turns at the existing unsignalized median opening at 180th Street, which would be closed under the Hawthorne Option. To support this change, the northbound left turn lane on Hawthorne Boulevard approaching 179th Street would be extended up to 230 feet. This added storage would help

prevent left-turning vehicles from spilling into through lanes, maintaining efficient traffic flow. The proposed signal would preserve access for local neighborhoods and businesses affected by the median closure. Signal warrant analysis would be provided for new signals in the next phase of engineering should the Hawthorne Option be approved by the Metro Board following certification of the Final EIR.

The Metro ROW alignments, including the LPA, do not include new signals along Hawthorne Boulevard as the alignments would be located along the Metro ROW.

21-5 Regarding 180th Street: The 2023 Transportation Detail Report, which evaluates non-CEQA issues and was published concurrently with the Draft EIR, analyzes the potential effects of the proposed median gap closure at 180th Street, including the anticipated diversion of northbound left-turn volumes to 179th Street. The Hawthorne Option would permanently close the median at this location and require left turning traffic to either continue north to the newly signalized intersection at 179th Street, or south to the existing signalized intersection at 182nd Street. Both locations permit drivers to make a U-turn to access 180th Street or the shopping plaza. This closure is required because the column placement through this segment would otherwise create visual obstructions that would prevent drivers from seeing oncoming traffic in an unsignalized left turn. According to the report, the 179th Street/Hawthorne Boulevard intersection is expected to handle the diverted traffic effectively, as it would be signalized under the Hawthorne Option, though adjustments to signal timing would be made to optimize flow and further minimize queues. Similarly, southbound drivers who would have previously turned left at 180th Street would be directed to continue to 182nd Street for left turns or U-turns. This change may impact the PM peak LOS at 182nd Street, but additional signal timing adjustments could further manage traffic flow at that location.

The Metro ROW alignments, including the LPA, do not include a median gap closure at the 180th Street/Hawthorne Boulevard intersection as the alignments would be located along the Metro ROW.

21-6 See response to Comment 21-2.

21-7 Figure 2.3-29 has been revised as requested, and is included in Section 4.3, Corrections and Additions, of the Final EIR. This revision does not change the analyses or conclusions of the Draft EIR.

21-8 The durations of some construction activities identified in Tables 2.4-1 through 2.4-3 on pages 2-54 and 2-55 of the Draft EIR would overlap. Accordingly, adding a row to the table summing up these values would not provide an accurate total. Therefore, no changes were made in the Final EIR.

21-9 The construction durations presented in the Draft EIR have not changed. However, the anticipated opening year of the project has shifted based on additional time needed to complete the CEQA process. See MR-21: Cost Estimates and Schedule.

21-10 The comment is noted regarding the anticipated longer permitting process for the Hawthorne Option compared to the other alignment options. Metro would coordinate with local and state agencies during later design phases to address necessary permitting based on the alignment approved for implementation by the Metro Board. Specific details about permitting timelines are not available at this stage.

21-11 The status of the project in Table 3.0-1 is updated to "Construction" in Section 4.4, Corrections and Additions, of the Final EIR. This revision does not alter the analyses or conclusions of the Draft EIR.

21-12 As noted by the comment, the proposed South Bay Galleria Station along Hawthorne Boulevard is approximately a half mile walk from the Redondo Beach Transit Center. However, as shown in Figure 3.1-4 on page 3.1-19 of the Draft EIR, many existing bus transit services travel along Hawthorne Boulevard and pass by the location of the proposed South Bay Galleria Station on their way to the Redondo Beach Transit Center. Metro and other transit operators typically review and adjust their bus routes routinely, e.g., twice a year. The bus routes could be adjusted to provide an additional stop close to the proposed South Bay Galleria Station and connect riders to the Redondo Beach Transit Center. Transit agencies typically assess and adjust their services during the construction of new rail stations to ensure effective connections, considering factors such as rider demand and accessibility needs. By the time of construction of this project, the existing transit network would have the flexibility to adapt based on observed demand and transit operator assumptions. As noted above, the Metro ROW alignments, including the LPA, do not include a station on Hawthorne Boulevard.

21-13 See MR-11: Traffic Delay and Level-of-Service. The 2023 Transportation Detail Report, which evaluates non-CEQA issues and was published concurrently with the Draft EIR, describes the estimated future conditions in 2042 without the project and analyzes the traffic circulation effects on intersection delay and queues for the project, including the Hawthorne Option. Metro, as a regional transit agency, is not subject to local LOS-based requirements.

21-14 See response to Comment 21-12.

21-15 The Construction Traffic Management Plan (CTMP) would be integrated into the permitting schedule for the project to ensure it is developed and approved prior to construction activities. Metro would coordinate closely with local agencies throughout the plan's review and approval process.

21-16 Page 3.1-21 of the Draft EIR consists of Table 3.1-5, which describes baseline conditions, not the Elevated/At-Grade Alignment. The City may be referencing a different page than the one noted in the comment. As defined in Chapter 2, Project Description, of the Draft EIR, the overall project is an extension of the light rail to the Torrance Transit Center, while the Trench and Hawthorne Options represent segments within the overall project that extend only from Redondo Beach (Marine) Station to 190th Street.

21-17 See response to Comment 21-2. The frequency of pedestrian injuries is closely related to the spacing and configuration of safe pedestrian crossings. As described in Section 3.1-3.12 of the Draft EIR, existing at-grade pedestrian crossings are provided at intervals of approximately 400 to 600 feet along Hawthorne Boulevard within the City of Lawndale. However, south of Artesia Boulevard, crossings are more widely spaced (over 1,000 feet), creating longer gaps without safe crossing points. Figure 3.1-14 in the Draft EIR shows that, north of Artesia Boulevard, there were six vehicle-pedestrian collisions over the five-year period of 2014 to 2018 distributed across all pedestrian crossings. In contrast, south of Artesia Boulevard, where crossings are more widely spaced, there were higher incidences of collisions, with two to five collisions occurring at each intersection and at least six collisions at 180th Street, where no signalized crossing is provided.

Additional signalized crossings, as proposed by the Hawthorne Option, would help reduce the distance between safe pedestrian crossings on Hawthorne Boulevard between Artesia Boulevard and 182nd Street, better supporting pedestrian access and redistributing some vehicular traffic. Under existing conditions, there are approximately 1,000 feet between existing signals. To avoid these longer walks, pedestrians might choose to cross at unsignalized locations, which is allowed under California Vehicle Code Section 275, but increases the risk of vehicle-pedestrian collisions. The additional signalized crossings proposed by the Hawthorne Option would improve overall pedestrian safety by enhancing designated crossing facilities and reducing the risk of collisions.

21-18 See responses to Comments 21-2 and 21-17.

21-19 See response to Comment 21-4.

21-20 See response to Comment 21-2.

21-21 See response to Comment 21-3.

21-22 See response to Comment 21-4.

21-23 See response to Comment 21-5.

21-24 The City's request for lane striping is noted. All comments have been shared with the Metro Board for their consideration. Per the California Manual on Uniform Traffic Control Devices, double yellow striping may only be used to separate lanes travelling in opposite directions. For this location, the separation between the northbound left-turn lane and the southbound #1 travel lane would be designed to maximize clearance and ensure safety, while complying with applicable traffic control standards.

21-25 The text is updated as requested in Chapter 4, Corrections and Additions, of the Final EIR to reflect the latest zoning code update as of January 1, 2023. This revision does not alter the conclusions of the Draft EIR.

21-26 Additional information about the business and commercial goals of Hawthorne Boulevard Corridor Specific Plan, including the design vision for the North Torrance District as a gateway and active commercial environment, has been incorporated into Section 3.2-1.3 and Table 3.2-5, as shown in Section 4.6 of Chapter 4, Corrections and Additions, of the Final EIR. These additions do not alter the analyses and conclusions of the Draft EIR. Furthermore, Section 3.2-4.2.2 of the Draft EIR evaluates the Hawthorne Option's potential to conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect. As detailed therein, light rail service along Hawthorne Boulevard and the addition of the proposed South Bay Galleria Station would support the goals of the Hawthorne Boulevard Corridor Specific Plan by offering an alternative to car travel and ensuring that the proposed improvements would align with future population and employment growth.

21-27 The Torrance Transit Center Station site plan has been updated in Appendix B, Select Advanced Conceptual Engineering Drawings - Locally Preferred Alternative, of the Final EIR, to include a note regarding the city's project.

21-28 Additional details about the land uses along Hawthorne Boulevard have been added to Section 3.2, Land Use and Planning, of the Draft EIR, as shown in Section 4.6, Corrections and Additions, of the Final EIR. These additions do not alter the conclusions of the Draft EIR.

21-29 The analysis in the Draft EIR indicates that construction-related pedestrian access closures for the Hawthorne Option could last for months in some locations, not years. Oversight and review by local agencies regarding the CTMP would occur prior to any closures. No revisions were made in the Final EIR in response to this comment.

21-30 The requested addition of the Hawthorne Boulevard Corridor Specific Plan to Table 3.2-5 has been made, as shown in Section 4.6, Corrections and Additions, of the Final EIR. The addition does not alter the conclusions of the Draft EIR. As described in Section 3.2-4.2 of the Draft EIR, the Hawthorne Option would not result in any significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect.

21-31 As stated on page 3.3-53 of the Draft EIR, shadow-sensitive uses generally include routinely useable outdoor spaces associated with residential, recreational, or institutional land uses; commercial uses, such as pedestrian-oriented outdoor spaces or restaurants with outdoor eating areas; plant nurseries; and existing solar collectors/panels. Shadows tend to be cast in a clockwise direction from west/northwest to east/northeast throughout the day across all seasons.

For the northern portion of the Hawthorne Option, where some residential properties are located to the southwest of the alignment and the I-405 is positioned to the northeast, the elevated rail structure and proposed plexiglass soundwalls would not substantially cast shadows over residential properties due to the standard shadow patterns, as discussed in Section 3.3-4.4.2 of the Draft EIR. Shadows from the elevated guideway, including soundwalls, would instead primarily fall onto the I-405 corridor to the northeast. Additionally, the elevated guideway's location within the median of Hawthorne Boulevard and the width of the roadway would prevent significant shading of residential areas to the east. Overall, the proposed Hawthorne Option would not result in substantial shadow impacts on residential properties.

21-32 It is not clear what the City intends by the phrase "aesthetics of additional infrastructure." Pursuant to CEQA Guidelines Appendix G, Section I, the relevant criterion for projects located in an urbanized area, such as the Hawthorne Option, is if the project would conflict with applicable zoning and other regulations governing scenic quality. Section 3.3-4.3 of the Draft EIR evaluates whether the project would conflict with applicable zoning and other regulations governing scenic quality. Regarding the Hawthorne Option, see the analyses of key observation point (KOP) 13 through KOP 23, starting on page 3.3-90 of the Draft EIR. Cumulative impacts of the Hawthorne Option are addressed in Section 3.3-7.1.

21-33 In Section 3.4, Air Quality, of the Draft EIR, the methodology for the localized air quality impacts analysis utilized the most conservative assumption for proximity of sensitive receptors. The Excelsior Preschool is accounted for in the analysis, even if it wasn't specifically identified on the sensitive receptor map. Furthermore, the Draft EIR includes evaluation of potential air quality impacts on the nearest existing sensitive receptors to the potential areas of disturbance. Such receptors are located closer to the Elevated/At-Grade Alignment and Trench and Hawthorne Options than the school. Thus, the conclusions in Section 3.4-4.3 (less than significant) would similarly apply to the potential for the Elevated/At-Grade Alignment and Trench and Hawthorne Options to expose the Excelsior Preschool to substantial pollutant concentrations.

21-34 The City notes the impact conclusion in Section 3.7, Biological Resources, of the Draft EIR. Section 3.7, Biological Resources has been updated in Chapter 4, Corrections and Additions, of the Final EIR.

21-35 Appendix 2-A, Select Advanced Conceptual Engineering Drawings, of the Draft EIR correctly depicted the project's footprint extending into the Southern Tarplant Open Space Preserve adjacent to the Torrance Transit Center. However, this limited encroachment was inadvertently omitted from the impact discussion in Section 3.7-4.1.1 of the Draft EIR. Since publication of the Draft EIR, Metro has confirmed that the project would encroach on approximately 7,471 square feet of the 87,036 square foot preserve due to a necessary maintenance and emergency access easement. The impact analysis and conclusions of Section 3.7-4.1 of the Draft EIR have thus been revised to describe the impact to the preserve during construction and operation of the project, as shown in Section 4.11, Corrections and Additions, of the Final EIR. As described therein, implementation of new mitigation measure MM-BIO-5: Off-site Mitigation for Southern Tarplant Habitat would reduce the impact to the preserve to less than significant for all light rail alignment options and alternatives. With implementation of MM-BIO-5: Off-site Mitigation for Southern Tarplant Habitat, the project would not affect the preserve's watershed or compromise the viability of the 3:1 replacement ratio established by the City.

21-36 The requested text describing duplication of service and need for transfers has been added to Chapter 4, Corrections and Additions, of the Final EIR. This clarification amplifies the information contained in the Draft EIR and does not alter its conclusions.

21-37 Section 4.10, Corrections and Additions, of the Final EIR, includes a revision to Mitigation Measure MM-VIB-1: Vibration Control Plan to require the contractor to notify nearby receptors, including surrounding businesses near the Del Amo Bridge, of upcoming pile-driving activities at least 72 hours in advance. This revision to the mitigation measure does not alter the conclusions of the Draft EIR.

21-38 Height, length, and soundwall features would be identified during final design to reduce noise to below the FTA moderate noise criteria. Soundwall locations are identified in Figure 3.6-21 through Figure 3.6-24 of the Draft EIR. See Figure 3.6-31 of the Draft EIR for examples of soundwall placement. See response to Comment 21-31 regarding shade.

21-39 As discussed in Section 3.7-5 of the Draft EIR, Mitigation Measure MM-BIO-2: Nesting Bird Season Restrictions and Pre-Construction Surveys requires that a pre-construction nesting bird survey be conducted by a qualified biologist within four days (96 hours) prior to the start of construction activities to determine the presence of active nests within or directly adjacent to the construction zone. This would include surveys at El Nido Park, as it is adjacent to the construction zones for the Metro ROW light rail alignment options and alternatives.

21-40 The label identifying Amie Sump in Figure 3.10-2 of the Draft EIR has been corrected to Pioneer Sump, as shown in Section 4.14, Corrections and Additions, of the Final EIR. This revision does not alter the conclusions of the Draft EIR.

21-41 Excelsior Preschool at 19801 Mariner Avenue is located adjacent to, but just outside, the RSA boundary for Public Services shown in Figure 3.15-4 in the Draft EIR. In addition, as discussed on page 3.15-35 of the Draft EIR, the project would not construct any residential units or directly increase the population within the RSA. Therefore, the project is not

expected to lead to unplanned population growth that would increase demand for educational facilities.

21-42 As discussed in Section 3.15-2.3 of the Draft EIR, the project would be subject to Project Feature PF-T-1: Construction Traffic Management Plan. This requires coordination with the city and emergency service providers to ensure emergency access is provided to the alignments and component sites and neighboring land uses.

21-43 The City's support for the Elevated/At-Grade Alignment and opposition to the Trench and Hawthorne Options is noted. All comments have been shared with the Metro Board for their consideration. Contrary to the comment and as shown in Table 4.5-1 of the Draft EIR, the Hawthorne Option would result in fewer significant and unavoidable impacts than the Elevated/At-Grade Alignment, as the Hawthorne Option would result in a less than significant impact related to operational noise-level increases. The LPA, however, would avoid the operational noise impact by grade separating light rail.

21-44 As shown in Drawing RW-763 of Appendix 2-A, Select Advanced Conceptual Engineering Drawings, of the Draft EIR, the Hawthorne Option is anticipated to include permanent acquisition of APN 4084-024-086 (Volvo Cars South Bay auto dealership) to allow the light rail structure to turn from Hawthorne Boulevard onto the Metro ROW. The elevated light rail structure would also require a permanent easement on APN 4084-024-026 (Jerome's Furniture, commercial business) to accommodate support structures necessary for the alignment to complete this turn. Additionally, a permanent easement on portions of APN 4084-024-023 (South Bay BMW/Mini auto dealership) would be required to allow for the placement of straddle bents to support the elevated light rail structure while also preserving visibility for motorists traveling along Hawthorne Boulevard. In order to construct the Hawthorne Option, temporary easements would be needed on portions of APNs 4084-024-023 (South Bay BMW) and 4084-024-063 (Penske South Bay Cadillac). A majority of the construction would occur within the street and public right-of-way, which are within Caltrans jurisdiction for this segment of Hawthorne Boulevard. As part of the advanced conceptual engineering process, Metro sought to minimize impacts to properties along the transition from Hawthorne Boulevard to the Metro ROW. However, due to geometric and engineering constraints, it was not feasible to fully avoid private property acquisitions where the alignment turns southeast toward the Metro ROW.

While potential effects on sales, property, and business license tax revenues do not constitute significant environmental impacts under CEQA, Metro is committed to minimizing property acquisitions and supporting the continued success of local businesses throughout construction and post-construction phases. The Metro ROW alignments, including the LPA, avoid affecting the properties noted in the comment as the alignments would travel along the Metro ROW.

21-45 Metro acknowledges the City's support for the Elevated/At-Grade Alignment and opposition to the Trench and Hawthorne Options. The LPA follows the Metro ROW for the entire length of the project. In selecting the LPA, the Metro Board took into account extensive community input, the anticipated environmental impacts identified in the Draft EIR, the long-term benefits of each alignment, and the estimated project schedule and costs. The Metro Board will continue to carefully weigh all relevant factors as part of its final decision on the project alignment following the release of the Final EIR. See MR-1: Selection of Alternatives and MR-21: Cost Estimates and Schedule.

21-46 This submission is a copy of the City of Torrance's September 19, 2018 letter to Metro regarding the Supplemental Alternatives Analysis (SAA) prepared for the project. Comments 21-46 through 21-48 predate the public review period of the Draft EIR (January 26 to March 27, 2023). Based on the SAA and input from stakeholders, including the City, Metro staff recommended two alternatives to be carried forward into the Draft EIR for further analysis: Alternative 1 (Metro ROW and overcrossing, without a station at Manhattan/Inglewood), and Alternative 3 (Hawthorne to 190th Street, without a station at Hawthorne/166th). At its September 19, 2018 meeting, the Metro Planning and Programming Committee approved the SAA and these staff recommendations. For additional details regarding the SAA and alternatives selection process, see Appendix 1-A, Notice of Preparation/Scoping Summary, of the Draft EIR.

21-47 The comment predates the public review period of the Draft EIR. See response to Comment 21-46.

21-48 The comment predates the public review period of the Draft EIR. See response to Comment 21-46.

21-49 This submission is a copy of the City of Torrance's March 3, 2021 letter on the NOP for the Draft EIR. Comments 21-49 through 21-66 predate the public review period of the Draft EIR (January 26 to March 27, 2023). The alignment referred to in the NOP as "Alternative 1" was evaluated as the "Proposed Project" in the Draft EIR and is referred to as the "Elevated/At-Grade Alignment" in the Final EIR. Like the Elevated/At Grade Alignment, the LPA follows the Metro ROW for the entire length of the alignment.

21-50 The comment predates the public review period of the Draft EIR. See response to Comment 21-49. The alignment referred to in the NOP as "Alternative 2" was evaluated as the Hawthorne Option in the Draft EIR.

21-51 The comment predates the public review period of the Draft EIR. See response to Comment 21-49. The Draft EIR thoroughly evaluates the potentially significant impacts of the Elevated/At-Grade Alignment and Trench and Hawthorne Options, with appropriate study areas tailored to applicable environmental topics to ensure relevant resources and receptors are appropriately considered. Where significant impacts are identified, the Draft EIR proposes mitigation measures to eliminate or lessen impact. See the analyses and conclusions in Section 3.4, Air Quality, of the Draft EIR.

21-52 The comment predates the public review period of the Draft EIR. See response to Comment 21-51, as well as the analyses and conclusions in Section 3.9, Hazards and Hazardous Materials, of the Draft EIR.

21-53 The comment predates the public review period of the Draft EIR. See response to Comment 21-51, as well as the analyses and conclusions in Section 3.10, Hydrology and Water Quality, of the Draft EIR.

21-54 The comment predates the public review period of the Draft EIR. See response to Comment 21-51, as well as the analyses and conclusions in Section 3.6, Noise and Vibration, of the Draft EIR.

21-55 The comment predates the public review period of the Draft EIR. See response to Comment 21-51, as well as the analyses and conclusions in Section 3.15, Public Services, of the Draft EIR.

21-56 The comment predates the public review period of the Draft EIR. See response to Comment 21-51, as well as the analyses and conclusions in Section 3.3, Aesthetics, of the Draft EIR.

21-57 The comment predates the public review period of the Draft EIR. See response to Comment 21-51, as well as the analyses and conclusions in Section 3.4, Air Quality, and Section 3.5, Greenhouse Gas Emissions, of the Draft EIR.

21-58 The comment predates the public review period of the Draft EIR. For clarification, the Draft EIR evaluated a fully grade-separated alignment along Hawthorne Boulevard, which would avoid any delays to vehicles on roads. See response to Comment 21-51, as well as the analyses and conclusions in Section 3.9, Hazards and Hazardous Materials, and Section 3.1, Transportation, of the Draft EIR.

21-59 The comment predates the public review period of the Draft EIR. See response to Comment 21-51, as well as the analyses and conclusions in Section 3.10, Hydrology and Water Quality, of the Draft EIR.

21-60 The comment predates the public review period of the Draft EIR. See response to Comment 21-51, as well as the analyses and conclusions in Section 3.6, Noise and Vibration, of the Draft EIR.

21-61 The comment predates the public review period of the Draft EIR. See response to Comment 21-51, as well as the analyses and conclusions in Section 3.2, Land Use and Planning, of the Draft EIR.

21-62 The comment predates the public review period of the Draft EIR. See response to Comment 21-51, as well as the analyses and conclusions in Section 3.1, Transportation, of the Draft EIR. See MR-11: Traffic Delay and Level-of-Service. The 2023 Transportation Detail Report, which evaluates non-CEQA issues and was published concurrently with the Draft EIR, analyzes all changes in roadways, including restriction of turning movements, signalization of intersections, etc. needed to implement the project along Hawthorne Boulevard.

There is no requirement that at-grade rail systems install “traffic signal pre-emption systems.” In California, at-grade rail systems are permitted to be designed for operation in the roadway integrated with the traffic signaling system. As noted on pages 2-14 and 2-15 of the Draft EIR, all grade crossings would be designed to comply with California Public Utilities Commission (CPUC) requirements, and are subject to the CPUC’s approval, which would review all grade crossings for safety regardless of what alignment is ultimately selected. There are many examples of at-grade rail systems already in operation in the Los Angeles region.

21-63 The comment predates the public review period of the Draft EIR. See response to Comment 21-51. Pursuant to CEQA Guidelines Section 15064(e), economic effects are not considered effects on the physical environment. The Draft EIR focuses on physical environmental impacts and measures to mitigate them, as required by CEQA. Additionally, the Draft EIR evaluates any indirect environmental impacts, such as growth-inducing impacts, which could result from economic and social changes.

21-64 The comment predates the public review period of the Draft. See response to Comment 21-51. Chapter 2, Project Description, of the Draft EIR, describes a proposed surface parking lot to be added at the Torrance Transit Center. Chapter 3, Affected Environment and Environmental Impact Analyses, of the Draft EIR, analyzes the impacts of the parking lot on the physical environment. Metro would continue to coordinate with local cities on the 3%

local match requirements, pending certification of the Final EIR and approval of the project by the Metro Board.

21-65 The comment predates the public review period of the Draft EIR. See response to Comment 21-51. Metro coordinated with stakeholders throughout the CEQA process, and provided opportunities for engagement through various means, including community open houses, neighborhood walks, door-to-door business outreach, transit rider intercepts, and briefings with key stakeholders. Metro would continue to actively engage with the community.

21-66 The comment predates the public review period of the Draft EIR See response to Comment 21-51. The comment is noted for the record. All comments have been shared with the Metro Board for their consideration.

21-67 This submission is dated November 1, 2022. Comments 21-67 through 21-74 predate the public review period of the Draft EIR (January 26 to March 27, 2023). The City's support for the Metro ROW alignment as of November 1, 2022, has been noted for the record and shared with the Metro Board for its consideration.

21-68 The comment predates the public review period of the Draft EIR. See response to Comment 21-67.

21-69 The comment predates the public review period of the Draft EIR. See response to Comment 21-67.

21-70 The comment predates the public review period of the Draft EIR. See response to Comment 21-67.

21-71 The comment predates the public review period of the Draft EIR. See response to Comment 21-67.

21-72 The comment predates the public review period of the Draft EIR. See response to Comment 21-67. The entire length of the light rail guideway would be enclosed with fencing, soundwalls, or a combination of both, to prevent unauthorized access. Recreational paths would be located outside of enclosed areas, reducing potential interactions between pedestrians and trains. See MR-8: Light Rail and Freight Train Safety.

21-73 The comment predates the public review period of the Draft EIR. See response to Comment 21-67.

21-74 The comment predates the public review period of the Draft EIR. See response to Comment 21-67, as well as the analyses and conclusions in Section 3.6, Noise and Vibration, Section 3.3, Aesthetics, and Section 3.1, Transportation, of the Draft EIR. See MR-10: Changes to Community Character and MR-11: Traffic Delay and Level-of-Service.

21-75 The City's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. Like the Elevated/At-Grade Alignment, the LPA would be located within the Metro ROW. However, unlike the Elevated/At-Grade Alignment, the LPA light rail guideway (as well as Trench and Hawthorne Options) would be fully grade-separated from all roadways.

21-76 See response to Comment 21-75.

21-77 See response to Comment 21-75.

21-78 See response to Comment 21-75.

21-79 CEQA does not require analysis of economic or social impacts unless they result in or are linked to a significant change in the physical environment. Metro has provided additional information on potential changes to Hawthorne Boulevard in the responses, as well as the 2023 Transportation Detail Report and 2023 Real Estate Acquisitions Report, published concurrently with the Draft EIR. Impacts related to connectivity and accessibility are addressed in Section 3.1, Transportation, of the Draft EIR. See MR-1: Selection of Alternatives for more information regarding constructability challenges for the Hawthorne Option.

21-80 See response to Comment 21-75.

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22-1 The City introduces concerns that are detailed further in Comments 22-2 through 22-3. See responses to Comments 22-2 to 22-153.

22-2 The Draft EIR establishes baseline conditions in accordance with CEQA Guidelines Section 15125(a), using the environmental setting as it existed at the time the Notice of Preparation was published (January 29, 2021), except where noted in individual sections. Each environmental resource topic in Chapter 3, Affected Environment and Environmental Impact Analyses, of the Draft EIR, including air quality, greenhouse gas emissions, land use, and transportation, includes a detailed description of baseline conditions. For all environmental topics, the baseline conditions include no light rail transit service, and the Draft EIR analyzes the impacts of introducing new light rail transit service.

22-3 The Draft EIR analyzes the impacts of introducing light rail service within the existing freight rail corridor, comparing these impacts against the baseline conditions of no light rail transit in the area. The increase in rail activity associated with the project, including the frequency of crossing, was evaluated in each relevant section of the Draft EIR, including transportation, noise, and vibration impacts. For example, Section 3.1, Transportation, of the Draft EIR, examines the impacts of increased crossing frequency on bicycle and pedestrian safety and emergency response times within the corridor. The Draft EIR similarly includes analysis in the other technical sections to evaluate and address potential environmental impacts. Section 3.6, Noise and Vibration, of the Draft EIR, analyzes potential effects from increased rail activity compared to current conditions with only occasional freight train operations. Therefore, the Draft EIR provides a comprehensive assessment of the anticipated changes and the impacts related to the addition of frequent light rail service and does not mischaracterize baseline conditions or environmental effects.

22-4 The Draft EIR's analysis of community division considers both the physical layout and access within the community. Although the Elevated/At-Grade Alignment would introduce additional light rail trains within the Metro ROW, this increase in train frequency does not constitute a physical division. All existing designated rail crossings at Inglewood Avenue, Manhattan Beach Boulevard, 159th, 160th, 161st, 162nd, 170th, and 182nd Streets would remain accessible, allowing residents to cross the Metro ROW as they currently do. As reflected in Chapter 2, Project Description, of the Draft EIR, the design takes into account the narrowing of the Metro ROW between 170th Street and Grant Avenue. Even with increased rail service, the Metro ROW configuration would not isolate any one part of the community or restrict connectivity between the areas. See MR-10: Changes to Community Character.

22-5 The light rail guideway of the Hawthorne and Trench Options, as well as the LPA, are fully grade-separated and would have no effect on emergency response times. See MR-1: Selection of Alternatives and MR-12: Emergency Access.

Section 3.1, Transportation, of the Draft EIR thoroughly analyzes the impact of adding gate-controlled, at-grade light rail crossings at 170th Street and 182nd Street for the Elevated/At-Grade Alignment. As discussed in Section 3.1-4.4.2 of the Draft EIR, these crossings would require emergency responders to either wait briefly while gates are down, or re-route to an alternate crossing. The wait-time would typically be less than one minute. Under CEQA, a change in circumstance alone does not constitute a significant impact. The impact threshold is whether the project would result in *inadequate* emergency access. Emergency response needs vary by location and time; not every response would necessitate crossing the tracks at 170th or 182nd Streets, and an approaching train would not always coincide with an emergency vehicle's path.

Although the Elevated/At-Grade Alignment would increase the frequency of blocked crossings relative to existing freight service, this situation is common in Los Angeles County where emergency responders have adapted effectively to the introduction of at-grade light crossings. In the City of Lawndale, seven at-grade freight crossings currently experience longer gate-down times with existing freight operations, suggesting that local emergency responders have developed practices and training for maintaining response times when a crossing is briefly blocked.

22-6 The Draft EIR thoroughly addresses the impacts associated with an increase in rail frequency, accurately characterizing existing conditions and comparing them to anticipated conditions with the project in place. For example, Section 3.2, Land Use and Planning, of the Draft EIR, analyzes the potential changes to land use with implementation of the project. Although additional light rail trains would operate within the corridor, all existing crossings would remain open, and the light rail trains would not physically divide the community. Furthermore, the Trench Option and LPA would fully grade separate the light rail trains from roadways. See MR-10: Changes to Community Character. Section 3.6, Noise and Vibration, of the Draft EIR, analyzes changes in noise using the FTA's 2018 Transit Noise and Vibration Impact Assessment Manual, which specifically directs that the differences between current freight operations and future conditions with both the proposed light rail and ongoing freight operations be evaluated. This method ensures a comprehensive assessment of "before and after" impacts on the community and provides a clear comparison of conditions with and without the project, freight train activity in the Metro ROW, and future conditions with proposed light rail and continued freight train activity in the Metro ROW. See MR-2: Operational Noise Analysis Methodology and Impact Thresholds, MR-5: Vibration Impact Types and Impact Thresholds, and MR-11: Traffic Delay and Level-of-Service. Additionally, see Section 3.3, Aesthetics, Section 3.15, Public Services, and Section 3.16, Other CEQA Considerations, of the Draft EIR.

22-7 The project is evaluated as a standalone project under CEQA because it has a logical terminus and independent utility, serving a specific transit need between Redondo Beach and Torrance without requiring additional phases to function effectively (*Del Mar Terrace Conservancy, Inc. v. City Council* (1992) 10 Cal. App. 4th 712). The cumulative impact analysis in the Draft EIR incorporates regional projections from the Southern California Association of Governments (SCAG) 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS), which accounts for other Metro rail projects and their combined

regional effects. In doing so, the Draft EIR evaluates the potential growth effects from past, present, and probable future projects. Each Metro project has specific local objectives, routes, and impacts that must be assessed individually to ensure an accurate and meaningful analysis under CEQA. Evaluating each project independently allows for the consideration of project-specific conditions, resources, and community concerns, while cumulative impacts are addressed within the framework of regional planning documents.

22-8 The 2009 Harbor Subdivision Alternatives Analysis received federal funding to complete planning studies, and Metro initially anticipated preparing a joint CEQA and NEPA document due to the potential for federal funding sources at that time. However, the project was put on hold, and upon resuming environmental planning in 2020, Metro no longer assumed federal funding. The project is now proposed to be funded through local and state sources, including Measure R (2008), Measure M (2016), and a state grant (2018). No federal agency currently holds discretionary authority or jurisdiction over the project. Therefore, NEPA does not apply.

The funding tables provided in the letter identify the $231.3M of Transit and Intercity Rail Capital Program (TIRCP) funding, which is a state funding source, not a federal one.

22-9 Other Metro rail projects have completed joint CEQA and NEPA documents because they involved specific federal funding sources or federal agency approvals, which triggered NEPA compliance for those projects. Regardless of funding sources, the project would still be consistent with CEQA's requirements for an independent, standalone project, as it has been developed with logical endpoints and independent utility. See response to Comments 22-7 and 22-8 on piecemealing and funding sources for the project.

22-10 See response to Comment 22-8. The scoping process in 2010 included federal agency involvement, because, at the time, Metro anticipated using federal funding sources. The project is currently proposed to be funded through local and state sources. Metro invited federal agencies to participate in the 2021 scoping process for the Draft EIR, but no federal agency provided any scoping comments. Table 2.6-1 of the Draft EIR does not list any federal agencies as responsible agencies under CEQA, because none have discretionary authority over the project.

22-11 Metro acknowledges that the project's current cost estimate exceeds the amount of funding that has been secured to date. Metro is continuing to explore additional funding sources and strategies to ensure the project could be fully funded and completed as planned.

22-12 Although there is a funding gap for the project, Metro remains committed to delivering a cost-effective project that meets the stated project objectives and balances the need to minimize environmental and community impacts. Federal funding is not proposed. The Draft EIR evaluates the potential environmental impacts based on the project as proposed, independent of funding sources. Should federal funding be needed in the future, the project would undergo NEPA review as required, but this alone would not alter the CEQA analysis or require changes to the Draft EIR.

22-13 The City appears to be referring to information provided in the 2023 Metro Cost Estimates Summary presentation, which states that the funding plan and construction schedule would be prepared after selection of the LPA. CEQA requires that potential environmental impacts are evaluated as early as feasible in the planning process to enable environmental considerations to influence project and design (CEQA Guidelines Section 15004[b]). For

public projects, an EIR should be prepared at the earliest feasible time so that the project sponsors may incorporate environmental considerations into project conceptualization, design and planning. Each rail alignment evaluated in the Draft EIR has unique costs and scheduling considerations. Metro will refine cost estimates and the funding plan specific to the LPA or other alignment ultimately selected by the Metro Board for implementation. Developing a funding plan after selection of the alignment is consistent with industry practice, as it allows for more accurate budget and phasing because it is closer in time to when construction would begin.

22-14 See response to Comments 22-8 through 22-10.

22-15 CEQA does not require that every construction detail be finalized at the time of the EIR. Most projects subject to CEQA rely on future, site-specific construction documents, such as the Construction Traffic Management Plans (CTMP), to manage temporary construction-related traffic impacts. As is standard practice, the CTMP would be prepared in later phases, once details, such as construction methods, phasing, and work-site logistics, are refined. A requirement to prepare a CTMP is a standard precaution "to address the ordinarily anticipated inconvenience and danger that arises when significant construction activity occurs in a congested environment" (*Protect Telegraph Hill v. City and County of San Francisco* (2017) 16 Cal.App.5th 261).

As specified in Project Feature PF-T-1: Construction Traffic Management Plan, the CTMP would follow Metro's Rail Design Criteria and standard Metro practice, to manage temporary effects on local roadways, pedestrian paths, and transit routes. As is typical for large infrastructure projects, the CTMP would be submitted to the local jurisdiction, and for certain areas, to Caltrans, to meet the transportation needs of communities and manage any temporary traffic disruptions. Key measures included in the CTMP would ensure access for vehicles, pedestrians, and cyclists, detour routes during road or lane closures, emergency access protocols, and coordination with affected cities and Caltrans. The CTMP would be updated as the project progresses and new information about construction logistics becomes available.

22-16 The City expresses general concerns about the adequacy of mitigation measures, citing "deferred studies, analyses or policies." However, the City does not specify which mitigation measures they believe to be deferred or inadequately addressed. All mitigation measures proposed in the Draft EIR are grounded in established standards, methods and guidelines, commonly accepted under CEQA for large-scale transportation projects.

The Draft EIR's methodology for evaluating project impacts and determining mitigation is consistent with standard and best practices under CEQA, and the measures proposed are similar to those successfully implemented in other Metro projects. The project features included in the Draft EIR provide specific commitments that are part of the project. In cases where additional studies or policies are referenced, this is done to ensure tailored, site-specific design solutions informed by best available data. Such practice ensures flexibility as design progresses while still adhering to well-established and effective standards.

The comment's footnote purports to provide an example where a land use mitigation measure is included in the Draft EIR, despite impacts being less than significant. This interpretation is incorrect. As described in Section 3.2, Land Use and Planning, of the Draft EIR, page 3.2-22, the Hawthorne Option would have a significant impact related to crossings during construction; therefore, Mitigation Measure MM LU-1: Temporary Crossings is

included to address this impact of the Hawthorne Option. As stated on page 3.2-29 of the Draft EIR, no mitigation measures are required for the Elevated/At-Grade Alignment and Trench Option. Similarly, no mitigation measures are required for the LPA. With implementation of Mitigation Measure MM LU-1: Temporary Crossings, the Hawthorne Option's land use impact would be reduced to less than significant with mitigation. For each significant impact identified in the Draft EIR, feasible mitigation measures are proposed to reduce or eliminate the impact. Although not relevant here, it should be noted CEQA does not prohibit agencies from adopting mitigation measures for impacts that may be less than significant, particularly for public projects in which the lead agency is the project proponent.

22-17 As described in Chapter 1, Introduction, and Chapter 2, Project Description, of the Draft EIR, the project is a proposed extension of light rail from the Redondo Beach (Marine) Station to the Torrance TC. The term "Proposed Project" was assigned to the Elevated/At-Grade Alignment in the Draft EIR, as that was the alignment that has been historically studied. For the segment of the alignment north of 190th Street, the Draft EIR studies two alignment options—the Trench Option and the Hawthorne Option. South of 190th Street, all alignment options converge into a single proposed alignment that terminates at the Torrance TC.

In *Washoe Meadows Community v. Department of Parks and Recreation*, cited in the comment, the EIR did not identify a proposed project but instead described five very different alternative projects. In contrast, the alignment options here are closely related and all serve the same basic objective: extending the light rail to Torrance in a way that is cost-effective and minimizes impacts. The Draft EIR presents a unified project with alignment options that allow the public and decision-makers to consider the impacts of each option while focusing on the central purpose of the project to extend light rail from the Redondo Beach (Marine) Station to the Torrance TC. Additionally, the Draft EIR clearly distinguishes between alignment options in the headings and labeling of figures and tables, making it clear which option is being discussed at each point. This structure provides transparency and allows the reader to follow and evaluate the differences between the options easily, supporting meaningful public and agency review.

22-18 Section 2.1-1 of the Draft EIR describes the high-capacity bus transit centers at the Redondo Beach TC and Torrance TC. These city TCs are referred to as high-capacity because they serve as major transfer hubs for multiple bus providers operating in the South Bay and are capable of accommodating high volumes of passengers and serving transfers from proposed rail stations to bus.

22-19 Figure 2.1-2 shows the project area boundaries, which are further detailed in Section 2.1-1 of the Draft EIR.

22-20 The project objectives serve to define the overarching goals and desired benefits of the project. As required by CEQA, the project objectives guide the selection of a final alignment without being so specific that they preclude the consideration of a reasonable range of alternatives (see CEQA Guidelines Section 15124[b]). By establishing these objectives, Metro is able to evaluate the potential benefits of each option, balancing considerations such as environmental, economic, and community impacts.

The objectives identified, including reducing air pollution and greenhouse gas emissions, minimizing environmental impacts, and providing a cost-effective project, are achievable and quantifiable within the scope of the project's design and construction. They reflect Metro's commitment to sustainable, environmentally responsible, and community-sensitive

transit solutions. Additionally, broad objectives are a standard practice in environmental planning under CEQA, as they allow for meaningful comparisons across alternatives that might achieve the goals in different ways.

22-21 The City asserts that the Draft EIR is not clear on property acquisitions. However, Section 2.4-1 of the Draft EIR describes the property acquisitions that would be required to construct and operate the project, and Appendix 2-A of the Draft EIR and the 2023 Real Estate Acquisitions Report, published concurrently with the Draft EIR, provide detailed information on the proposed property acquisition needs. Metro has designed the project to avoid displacement of residents. North of 190th Street, Metro owns the ROW along the existing corridor, meaning only minimal permanent non-residential property acquisitions are anticipated in this area, primarily for the TPSSs to support operations. See MR-8: Light Rail and Freight Train Safety for more information regarding how the Metro ROW has sufficient width to fit the light rail project within the existing corridor. South of 190th Street, Metro and BNSF share ownership of the rail corridor. Metro is coordinating with BNSF to determine any additional Metro ROW needs within this segment to accommodate the new tracks.

22-22 The width of the Metro ROW varies across the project area. Most segments measure 100 feet, but some are narrower (75 feet) or wider (over 150 feet). Figure 2.3-2 in the Draft EIR illustrates the approximate Metro ROW widths specifically between Inglewood Avenue and Manhattan Beach Boulevard. Appendix 2-A, Select Advanced Conceptual Engineering Drawings, of the Draft EIR and the 2023 Real Estate Acquisitions Report, published concurrently with the Draft EIR, show detailed Metro acquisition information. Metro has completed a property boundary survey in Spring 2025 to confirm boundary lines, which is reflected in the Final EIR Appendix B, Select Advanced Conceptual Engineering Drawings - Locally Preferred Alternative.

The footnote that the City refers to does not apply to Figure 2.3-2 in the Draft EIR; it refers to Figure 2.3-3 in the Draft EIR, which shows the retained fill cross-section. Retained fill would elevate portions of the alignment to maintain the required clearance over local streets and rail infrastructure. This type of elevation would help enable the project to remain within the existing Metro ROW, where feasible.

22-23 Chapter 2, Project Description, of the Draft EIR provides an overview of the construction types proposed for the elevated structures. The alignment description also provides information on where specific structure types, such as columns or retained fill, would be located. Further details on the specific structural support type (columns or retained fill) would be determined by site conditions, safety requirements, and space constraints.

22-24 The typical cross-sections are intended to provide a general representation of the project's layout throughout the corridor rather than exact measurements, as spacing varies depending on specific site conditions. With regard to separation between light rail and freight tracks, Metro has designed the project to ensure adequate separation based on applicable safety standards and engineering requirements. See MR-8: Light Rail and Freight Train Safety, and Draft EIR Appendix 2-A, Select Advanced Conceptual Engineering Drawings, of the Draft EIR and Final EIR Appendix B, Select Advanced Conceptual Engineering Drawings - Locally Preferred Alternative, for more details on the placement of relocated freight and light rail tracks.

22-25 As stated on page 2-10 of the Draft EIR, the proposed light rail tracks would cross over Artesia Boulevard on a newly constructed bridge, which would be located adjacent to the existing freight bridge. This new bridge structure is shown in Appendix 2-A, Select Advanced Conceptual Engineering Drawings, of the Draft EIR (sheet T-108) and its impacts are analyzed across all relevant environmental resource topics as part of the Elevated/At-Grade Alignment and Trench Option. Also see Final EIR Appendix B, Select Advanced Conceptual Engineering Drawings - Locally Preferred Alternative.

22-26 See response to Comment 22-24. Chapter 2, Project Description, of the Draft EIR, provides an overview of freight track relocations, with detailed plans provided in Appendix 2-A, Select Advanced Conceptual Engineering Drawings, of the Draft EIR. The multi-use paths would be approximately 20 feet wide between 159th Street to 170th Street and approximately 10 to 20 feet wide from Grant Avenue to 182nd Street. Final dimensions would be refined in the next phase of design, pending the Metro Board's certification of the Final EIR and approval of the project. Figures 2.3-3 and 2.3-4 illustrate a wall separating the multi-use path from the relocated freight line. The level of detail provided in the Draft EIR and underlying ACE drawings, is consistent with CEQA Guidelines Section 15124, which prescribes that an EIR's project description "should not supply extensive detail beyond that needed for evaluation and review of the environmental impact."

22-27 See response to Comments 22-19 to 22-26. The level of detail provided in the Draft EIR is consistent with CEQA Guidelines Section 15124, which provides that an EIR must provide a "general description" of the project's technical characteristics, but "should not supply extensive detail beyond that needed for evaluation and review of the environmental impact."

22-28 It is reasonable to assume that Metro would continue to procure and operate the same type of light rail vehicles currently used across the Metro rail system. The basic dimensions, appearance, and material composition of these vehicles are standardized to ensure system-wide compatibility, operational efficiency, and consistency in rider experience. Should Metro update its light rail vehicle fleet in the future, any new models would still need to comply with these established standards to ensure that the light rail network functions as designed. Consequently, potential changes in vehicle models would not introduce impacts beyond those evaluated in the Draft EIR, which evaluated potential environmental impacts (including those related to aesthetics and air quality) based, in part, on the deployment of light-rail-vehicle types currently used by Metro along the project alignments. Assuming otherwise would be speculative. Additionally, Metro light rail vehicles are electrically powered, meaning that they do not emit exhaust.

22-29 The additional elements refer to the overhead contact system (OCS), traction power substation (TPSS), and communications and signaling buildings. These elements, along with size, location, and numbers, are described in Section 2.3-4-4, pages 2-43 to 2-47, of the Draft EIR. These elements are standard to Metro's light rail network and are described in Chapter 2, Project Description, of the Draft EIR to allow for meaningful public comment on their roles and potential impacts within the project area. Additionally, Appendix 2-A, Select Advanced Conceptual Engineering Drawings, of the Draft EIR provides advanced conceptual engineering drawings to clarify placement and configuration. Also See Final EIR Appendix B, Select Advanced Conceptual Engineering Drawings - Locally Preferred Alternative.

22-30 The exact OCS configuration, including the number and location of single versus dual poles, would be refined during the detailed design phase, pending the Metro Board's certification

of the Final EIR and approval of the project. While the Draft EIR describes the typical setup of the OCS—using poles to support overhead wires in certain sections—these details do not substantially alter the environmental impact analysis. The Draft EIR evaluates the OCS as a whole, including its potential visual and construction-related impacts, and this evaluation remains accurate regardless of the specific pole configuration. Additionally, Metro's standard OCS designs are similar across its rail network, ensuring consistency with established design standards.

22-31 Chapter 2, Project Description, of the Draft EIR identifies the preliminary locations of the TPSS sites on page 2-45. While some flexibility is retained to ensure TPSS buildings align with context-sensitive urban design principles, this does not constitute a lack of specificity under CEQA. The phrase "urban design principles" generally refers to context-sensitive design. This means that the TPSS facilities would integrate appropriately with surrounding environments and maintain compatibility with local aesthetics. This flexibility allows Metro to implement specific design choices based on the unique character of each TPSS location and to consider community input, without affecting the overall impact analysis presented in the Draft EIR. The 2023 Urban Design Report, published concurrently with the Draft EIR, provides additional information regarding the project's preliminary design standards.

22-32 The aesthetics analysis was prepared in accordance with the CEQA Guidelines and Metro procedures. Detailed aesthetics impact analyses and explanations of impact determinations are provided on pages 3.3-54 through 3.3-120 of the Draft EIR. For the elements of the aesthetics analysis that did not require mitigation measures, the reasoning was given in the Draft EIR for why the potential impacts did not reach the level of significance. In addition, the Draft EIR includes 23 visual simulations showing "before" and "after" views of the project area, enabling reviewers to understand how the project elements may alter the surrounding landscape.

As part of this aesthetics impact analysis, the City of Lawndale's Open Space Element (City of Lawndale, 1992b) was reviewed in the context of this project, and no goals or policies within that element were found to address visual resources or aesthetic quality/character. However, as stated on page 3.3-59 of the Draft EIR, the Metro ROW alignments would be consistent with Policy 2c of the then-applicable Land Use Element (City of Lawndale, 1992c), which states that the use of land shall include design features that create a positive impact for the surrounding area. After the Draft EIR was issued, the City of Lawndale adopted a General Plan Update (General Plan 2045), which replaces the prior General Plan in place at the time the Draft EIR for this project was issued. The General Plan Update does not include a standalone open space element, although open space is addressed in other elements, including the Resource Management Element and Land Use Element. The project's unified design elements and landscape design would have an overall positive effect along the Metro ROW, as it would contribute positive visual elements, such as uniform landscaping, landscaped public space, and other amenities. The comment does not identify any specific policies in the City's former General Plan or the General Plan Update that the project would be inconsistent with.

The detailed analysis on pages 3.3-55 through 3.3-114 of the Draft EIR concludes that none of the alignment options would conflict with applicable policies or regulations governing scenic quality. Therefore, this impact was determined to be less than significant. The same analysis also applies to the LPA, as discussed in Chapter 4, Evaluation of Alternatives, of the Draft EIR. See also MR-10: Changes to Community Character.

22-33 See response to Comment 22-32. For each resource topic addressed, the Draft EIR thoroughly evaluates the project's consistency with the City of Lawndale's policies and regulations. Regarding aesthetics, as explained on page 3.3-12 of the Draft EIR, the visual resources assessment considers unique views, views identified as being important in local plans or codes (e.g., protected views), views from designated scenic highways, or cultural modifications. No such resources were identified within the RSA.

The City asserts that the proposed multi-use path would disrupt existing recreational features used by Lawndale residents but does not specify which features would be affected, limiting the ability to provide a detailed response. The proposed multi-use path is designed to enhance recreational opportunities for Lawndale residents by providing safe, accessible pathway along the Metro ROW that are designed to avoid interference with existing open space and recreational areas. Additionally, Metro's Tree Policy requires a minimum tree replacement ratio of 2:1 (or 4:1 if the tree is considered a heritage tree) with California-native or other drought-tolerant trees, as described on page 3.3-69 of the Draft EIR. This policy ensures that any trees removed would be replanted in a visually appealing manner, preserving and enhancing the aesthetic character of the area. For further information, see MR-10: Changes to Community Character.

22-34 See response to Comment 22-32. At the time Metro published the Draft EIR, the City of Lawndale's General Plan designated the Metro ROW "Public Facilities/Schools," not open space (City of Lawndale, 2023). Although the City's General Plan Update, which the City approved in December of 2023, identifies this area as open space, CEQA did not require the Draft EIR to evaluate consistency with that plan, as it had not yet been approved when Metro prepared the Draft EIR (*Chaparral Greens v. City of Chula Vista* (1996) 50 Cal.App.4th 1134, 1145, fn. 7). The City's adoption of the General Plan Update does not constitute significant new information requiring recirculation of the Draft EIR under Public Resources Code Section 21166 and CEQA Guidelines Section 15088.5, because the change in land-use designation does not change the actual physical environmental conditions along the Metro ROW. The project's design includes enhancements, such as tree planting and landscaping along the multi-use path that would complement the existing character in the area. For additional information, see MR-10: Changes to Community Character.

22-35 See response to Comment 22-32. Under CEQA, the presence of a new element, structure, or other above ground elements does not automatically imply there would be a significant impact. The City's Land Use Element of the General Plan incorrectly identifies the Metro ROW as open space rather than its current use as an active rail corridor. Metro acknowledges that residents currently use the Metro ROW as recreational space, although it is not a designated park or walkway, and its purpose is rail transportation. See MR-10: Changes to Community Character for more information.

22-36 See response to Comments 22-33 through 22-35 and MR-10: Changes to Community Character.

22-37 Under CEQA, the introduction of a new element, structure, or other above ground structures or wires does not automatically constitute a significant aesthetic impact. Figure 3.3-17, View 12, in the Draft EIR depicts the Metro ROW, which includes a greenway with mature trees, and View 48 depicts a residential area south of the Metro ROW. These locations are considered urbanized, as they are either within or surrounded by highly developed areas. In the context of the entire project area, they are not visually unique.

22-38 The City does not specify the other fundamental aesthetic elements that they believe are missing and does not provide specifics for inadequate methodologies. Baseline descriptions and figures of the existing and proposed aesthetic conditions are provided on pages 3.3-11 through 3.3-54 of the Draft EIR.

22-39 See response to Comment 22-37. The photographs provided by the City illustrate existing conditions and light rail infrastructure, consistent with the visual simulations provided in the Draft EIR. The existing Metro ROW runs through urbanized areas with diverse land uses where transportation infrastructure and built-up surroundings are already prominent. While the project would introduce new elements, the overall visual impacts would be less than significant.

22-40 See response to Comments 22-37 and 22-39. The photographs provided by the City illustrate existing conditions and light rail infrastructure, consistent with the visual simulations provided in the Draft EIR. The existing Metro ROW runs through urbanized areas with diverse land uses, where transportation infrastructure and built-up surroundings are already prominent. While the project would introduce new elements, the overall visual impacts would be less than significant.

22-41 The Draft EIR addresses potential impacts on aesthetics and visual resources, including effects from the presence of new structures, such as poles, wires, and soundwalls. Maintenance of these features falls under Metro's standard procedures, which have been developed and refined over years of operating similar transit lines. The proposed light rail guideway would operate in a sealed corridor, meaning that transit riders would not have direct access to the surrounding rail corridor or to deposit litter or graffiti, and security fencing would prevent access to non-station areas.

Metro has established procedures to maintain the cleanliness and appearance of its transit corridors. This includes a graffiti program that requires the removal of graffiti within 24 hours of when it is reported and the use of anti-graffiti coating, where possible. All surfaces within the project's station public areas (within the touch zone) would have anti-graffiti coatings. Additionally, Metro's standard operations and maintenance plans address routine landscaping, vegetation management, and litter removal activities. Maintenance agreements with local jurisdictions would also be established as project design progresses.

Additionally, Metro has prepared a Homeless Outreach Plan to address the presence of unhoused individuals along its corridors. The program involves partnerships with local law enforcement and social services to connect individuals and families to resources and services. See MR-9: Light Rail Security and MR-18: Homelessness.

22-42 See response to Comment 22-41. While design plans for art, wayfinding, and branding would be refined in future phases, Metro is committed to ensuring that public art enhances, rather than detracts from, the aesthetic quality of the surrounding area. Metro's Art Program Policy, described on page 3.3-1 of the Draft EIR, emphasizes community involvement and artist collaboration to ensure the artwork contributes positively to the environment.

22-43 See response to Comment 22-41.

22-44 Apart from construction nighttime lighting impacts, the Draft EIR concluded that the impacts of the Metro ROW alignments and Hawthorne Option on aesthetic and visual resources would be less than significant. Mitigation Measure MM-AES-1: Construction

Lighting, is provided for all options, including the LPA. The Draft EIR provides a sufficient level of project design to evaluate potential aesthetic impacts under CEQA and describes all of the major project components, including structures, landscaping, and visual elements.

22-45 Soundwalls are included as noise mitigation measures under Mitigation Measure MM-NOI-2: Soundwalls and are not intended to mitigate aesthetic impacts directly. The locations of the proposed soundwalls are provided in Figures 3.6-21 through 3.6-24 and Tables 3.6-26, 3.6-31, and 3.6-33 of the Draft EIR, for the Metro ROW alignments and Hawthorne Option, respectively. No soundwalls in addition to what is described in the Draft EIR for the Metro ROW alignments would be required for the LPA. Section 3.3, Aesthetics, of the Draft EIR evaluates the visual effects of the soundwalls at each potentially affected key observation points (KOP), including the effects of the soundwalls when combined with the elevated light rail tracks and other vertical elements. As shown in Figure 3.3-59, the soundwalls would be designed with consideration of the surrounding context, and with materials, colors, and landscaping treatments to minimize their visual impacts and ensure they blend with adjacent development. Pursuant to Mitigation Measure MM-NOI-2: Soundwalls, materials, colors, landscaping, and/or other aesthetic treatments would be integrated into the design of the soundwalls to minimize dominance and scale. As concluded in Section 3.3-4 of the Draft EIR, the changes in visual quality due to the project, including soundwalls, would be neutral, as the new components would be consistent with the existing urbanized visual character of the corridor.

22-46 Compliance with Metro Design Standards is included as a project feature on page 3.3-10 of the Draft EIR. The Metro Design Standards refer to Metro's Rail Design Criteria (MRDC), Metro's Art Program Policy, Metro's Transit Service Policies & Standards, Systemwide Station Design Standards Policy, and Standard/Directive Drawings, or equivalent.

22-47 Details of the Metro's Tree Policy are provided on page 3.3-2 of the Draft EIR. Per CEQA Guidelines Section 15148, "[p]reparation of EIRs is dependent upon information from many sources. These documents should be cited but not included in the EIR." Thus, while the Draft EIR references Metro's Tree Policy, it was not required to include a full copy. The focus of CEQA is to identify and analyze potentially significant environmental impacts, not necessarily to provide a fully detailed design plan for every aspect of a project, including landscaping.

The Draft EIR provides sufficient information to assess potential impacts related to landscaping. Project Feature PF-AES-2: Metro Design Standards further commits the project to implementing Metro's design policies, which ensure high-quality landscaping and visual appeal. Section 3.3-4.3.2 of the Draft EIR provides details concerning landscaping, as relevant, in the text and corresponding visual simulations. The project's unified design elements and landscaping would contribute positive visual enhancements, such as unform landscaped public spaces. In addition, as relevant to the City of Lawndale, the 2023 Urban Design Report, published concurrently with the Draft EIR, provides that the project design would focus on preserving the open space character along Condon Avenue by retaining mature trees, where feasible, and introducing additional shade trees to enhance the corridor's visual character. CEQA does not mandate a detailed landscape and maintenance plan at the EIR stage. Such details would be determined during final design.

22-48 The photos of Compton provided by the City show that specific area's visual conditions, where hardscape predominates. This does not represent the Metro Design Standards or intended landscaping approach for the project. As stated in the Draft EIR and 2023 Urban

Design Report, published concurrently with the Draft EIR, Metro is committed to integrating the project into the surrounding environment to the extent feasible, with landscaping and tree replacement planned within the Metro ROW to preserve the corridor's general character. Potential impacts related to light and glare are analyzed in Section 3.3-4.4 in Section 3.3, Aesthetics, of the Draft EIR. The same analysis also applies to the LPA, as discussed in Chapter 4, Evaluation of Alternatives, of the Draft EIR.

22-49 The aesthetics impact methodology, including descriptions of representative views and viewers, is discussed on pages 3.3-12 and 3.3-13 of the Draft EIR. The same analysis also applies to the LPA, as discussed in Chapter 4, Evaluation of Alternatives, of the Draft EIR. The KOPS were selected to capture a range of typical views from various vantage points along the project corridor, with the goal of illustrating the potential visual changes from various perspectives, including the views by pedestrians, motorists, transit riders/commuters, employees and patrons and nearby residents. The KOP simulations provide a conceptual illustration of the visual changes associated with the above-ground elements, presenting a cross-section of locations where changes could be more noticeable to a larger number of viewers, as well as where changes would appear minimal. By including both substantial and minimal impact perspectives, the simulations provide a balanced and representative view of potential visual effects from different viewer types and exposure levels.

It should also be noted that CEQA does not require KOP simulations, or visual simulations generally. The KOP simulations are provided in the Draft EIR to give the public a conceptual understanding of potential visual changes resulting from the project. The purpose of these simulations is to aid in understanding, rather than to exhaustively illustrate every possible viewpoint.

22-50 See response to Comment 22-49. The Draft EIR includes several KOP figures that represent residential areas in Lawndale and nearby open spaces, including Figures 3.3-61, 3.3-62, and 3.3-63 in Section 3.3, Aesthetics, of the Draft EIR. The same analysis also applies to the LPA, as discussed in Chapter 4, Evaluation of Alternatives, of the Draft EIR. This range of KOPs provides a balanced perspective on how different areas may experience visual changes due to the project.

22-51 The Draft EIR defined the RSAs for aesthetics as extending a quarter mile from the alignment, a standard distance in visual impact assessments that allows for focused analysis of areas most likely to experience significant visual change. As described on pages 3.3-7 to 3.3-8 in Section 3.3, Aesthetics, of the Draft EIR, the quarter-mile RSA accounted for several factors, including landform, vegetation, and atmospheric conditions, that objectively impact visibility and limit human sight. The same analysis also applies to the LPA, as discussed in Chapter 4, Evaluation of Alternatives, of the Draft EIR. In urban areas like the project corridor, views of the alignment would often be naturally obstructed by the intervening elements, which would prevent the project from being visually prominent beyond the RSA. Additionally, to ensure that areas outside of this primary zone are also considered, the Draft EIR analyzed visual impacts from major arterials, freeways, and railways, as those areas provide relevant sightlines to the alignment.

22-52 The comment is referring to the general definition of "visual quality" provided in the Draft EIR to help readers understand how aesthetic impacts are typically evaluated under CEQA. As explained in the Draft EIR, visual quality refers to the perceived aesthetics of a landscape, which indeed could vary based on viewers' values and perceptions; however, this definition

serves as a foundation for analyzing visual impacts systematically and is not an assertion about a specific community, including Lawndale.

The visual impact analysis was conducted following Federal Highway Administration (FHWA) criteria that assess how changes in the landscape, such as new structures, soundwalls, and lighting, might alter the visual character of a location based on objective factors like scale, contrast, and consistency with the existing environment. This approach ensures that all affected areas are evaluated with the same criteria, providing a fair, balanced assessment of potential visual impacts for communities along the project corridor.

22-53 The existing visual character of residential areas adjacent to the project is documented and shown in a range of representative views throughout Section 3.3, Aesthetics, of the Draft EIR, specifically in Figures 3.3-5, 3.3-15, 3.3-16, 3.3-17, 3.3-18, 3.3-21, 3.3-22, 3.3-24, 3.3-25, 3.3-27, 3.3-28, 3.3-38, 3.3-43, and 3.3-50. Each of these figures is discussed in the corresponding text, detailing how the project may alter these residential areas' views and visual character. CEQA does not require an EIR to describe every individual street within the project vicinity, and the Draft EIR appropriately provides an assessment of visual character representative of the corridor's neighborhoods.

While the Draft EIR notes that many residences were developed between the 1930s and 1970s, this timeframe reflects the general historical development of the area. The visual analysis does not understate the character or significance of these suburban neighborhoods. Instead, it provides a representative baseline for assessing the project's visual impacts.

As the project is located in an urbanized area, the applicable threshold is the potential for the project to conflict with applicable zoning and other regulations governing scenic quality. The analysis in Section 3.3-4.3 of the Draft EIR considers visual character and scenic quality impacts from public vantage points. The detailed analysis on pages 3.3-55 through 3.3-114 of the Draft EIR includes "before" and "after" visual simulations and concludes that none of the alignment options would conflict with applicable policies or regulations governing scenic quality. Therefore, this impact was determined to be less than significant. The same analysis also applies to the LPA, as discussed in Chapter 4, Evaluation of Alternatives, of the Draft EIR.

22-54 Figure 3.3-3 serves as a reference point within the existing conditions section of the Draft EIR and, accordingly, does not indicate future project impacts, which are discussed separately in the impact analysis. Section 3.3, Aesthetics, of the Draft EIR, includes KOPs representative of each type of proposed railroad crossing: light rail on an elevated structure, light rail at-grade, and light rail within a trench. This selection of KOPs provides a conceptual overview of anticipated visual changes and is designed to capture typical impacts without requiring exhaustive simulations for every potential viewpoint. This approach complies with CEQA by effectively disclosing a range of representative impacts on visual character and facilitating meaningful public review of anticipated changes. The same analysis also applies to the LPA, as discussed in Chapter 4, Evaluation of Alternatives, of the Draft EIR.

22-55 Page 3.3-22 of the Draft EIR identifies the primary uses south of Manhattan Beach Boulevard as including small-scale single- and multi-family residential buildings within the City of Lawndale, capturing the general residential character of this segment.

22-56 The Draft EIR provides distinct discussions for El Nido Park and the Metro ROW because they differ in purpose, ownership, and use. Page 3.3-31 of the Draft EIR addresses El Nido Park specifically, as it is an official recreational park owned by the City of Torrance and

designated for public recreational use. In contrast, the Metro ROW is an active railroad corridor owned by Metro and is designated as a railroad corridor. While members of the community may use portions of the Metro ROW for recreational purposes, this is not an authorized use of the property.

22-57 The Draft EIR provides an analysis of potential light and glare impacts informed by the Metro Design Standards, as stated on page 3.3-11. These standards ensure that project lighting and materials would be consistent with other Metro light rail projects currently in operation, which prevent significant light and glare impacts. Best practices, such as using non-reflective surfaces where feasible, would be incorporated to minimize glare. Additionally, the project would comply with applicable lighting regulations, which would be verified during the permitting process and would include industry standards and/or technical lighting specification standards that are determined during the final design process.

22-58 See response to Comment 22-48 and response to Comment 22-57. Unlike fixed sources, train lighting is in motion, creating only brief, intermittent reflections as the train passes through, thereby minimizing sustained glare. Thus, the train lighting would not be considered a substantial source of light or glare, which could adversely affect views in the area. Furthermore, the lighting design for the light rail train and guideway would be focused on the rail corridor to ensure safety, with shielded and downward-directed lights that avoid casting light or spillover onto surrounding areas. Additionally, the urbanized project area already includes ambient lighting from streetlights, commercial sites, and traffic, meaning that train lighting would minimally impact overall light levels. Metro also incorporates non-reflective materials on train cars and associated infrastructure to further reduce glare from sunlight or artificial lighting. Further, the trains would not use flashing or rotating lights, which are more disruptive; rather, the trains would maintain consistent, non-pulsing lights for track visibility. Collectively, these design considerations would ensure light and glare impacts on daytime and nighttime views would not be substantially different than existing conditions and no significant impact would result.

22-59 See response to Comments 22-57 and 22-58. As stated in Section 3.3-2.4 of the Draft EIR, as part of the project, Project Feature PF-AES-2: Metro Design Standards would be used, which would require all lighting be compliant with Metro Design Standards. The lighting would be hooded, and angled away from adjacent land uses. Lighting industry standards and best practices for transit project lighting in light-sensitive or residential areas would be followed, in compliance with Metro Design Standards. These are aspects that the project must comply with and the construction contractor would also be required to implement.

22-60 Although the CEQA Guidelines do not establish criteria for evaluating shade and shadow impacts, the Draft EIR assesses shadow impacts on shadow-sensitive uses, such as outdoor recreational areas and public spaces where prolonged outdoor activities occur. Sidewalks, streets, and “buildings,” including residential buildings, are not considered shadow-sensitive uses, because temporary shadowing over these areas does not interfere with their basic purpose. Additionally, the shade and shadow pattern created by the elevated structures would be intermittent and would shift throughout the day, thus, not creating sustained shadow impacts. Due to the relatively dense arrangement of existing buildings, structures, and, in some cases, mature trees and vegetation in a large portion of the project area, a considerable amount of existing shadow coverage currently exists, including in residential areas near the alignment. The addition of the project in these areas would not result in a

substantial amount of new shadow coverage, and as previously stated, the casting of shadows would shift throughout each day, as well as change depending on the season of the year.

22-61 See response to Comments 22-32 to 22-60.

22-62 See MR-2: Operational Noise Analysis Methodology and Impact Thresholds. Sensitive uses were identified per the FTA's Transit Noise and Vibration Impact Assessment Manual (2018), which includes Category 1 high-sensitivity uses where quiet is an essential element (e.g., Zen garden, outdoor amphitheaters), Category 2 residential uses where people normally sleep, and Category 3 institutional uses with primarily daytime and evening use (e.g., schools, churches). It appears that the comment was intended to cite Section 21001 (not 21002) of the Public Resources Code. Metro's consideration of the project is consistent with the Legislative intent declared in Public Resources Code Section 21001(b), because the Draft EIR applied strict and well-established noise impact criteria and includes robust noise mitigation measures to reduce noise impacts to the maximum extent feasible. The California Legislature has also declared that there is "an imperative need for a comprehensive mass transit system in the southern California area, and particularly in Los Angeles County" and that it is the "policy of the state to foster the development of trade and the movement of people in and around the Los Angeles area for the benefit of the entire state" (Pub. Util. Code Section 30001[a]).

22-63 The air quality analysis in the Draft EIR thoroughly accounts for emissions from all vehicle trips associated with the project, including vehicle use by light rail patrons traveling to and from stations. The net regional effect of project operations would be a substantial reduction in vehicle trips and on-road vehicle miles traveled (VMT). Specifically, as detailed in Section 3.4-4.1.2 of the Draft EIR, the Elevated/At-Grade Alignment and Trench Option would reduce daily VMT by approximately 34,500 vehicle miles and the Hawthorne Option would reduce daily VMT by approximately 34,900 vehicle miles in the operational year of 2042. The LPA would follow the Metro ROW for the entire length of the project, and the light rail would be entirely grade-separated. Thus, the LPA would result in similar VMT benefits as the Elevated/At-Grade Alignment and Trench Option.

Further, Table 3.4-18 on page 3.4-44 of the Draft EIR presents a summary of the anticipated change in daily air pollutant emissions from project operations in the 2042 operational scenario year, which demonstrates a net decrease in emissions due to reduced VMT. The same analysis also applies to the LPA, as discussed in Chapter 4, Evaluation of Alternatives, of the Draft EIR. Regional transit projects, like this one, are generally acknowledged to result in reductions in vehicle trips and corresponding air pollutant emissions due to fewer individual car trips and reduced cold starts.[1] The air quality analysis presented in the Draft EIR was prepared in accordance with the South Coast Air Quality Management District (SCAQMD) guidance and satisfies the requirements of CEQA for operational impact analysis. No further analysis is warranted.

22-64 Site-specific soil contamination assessments are not specifically addressed in Section 3.4, Air Quality, of the Draft EIR. However, Section 3.9, Hazards and Hazardous Materials, of the

[1] See FTA's *Public Transportation's Role in Responding to Climate Change* (January 2010) at https://www.transit.dot.gov/sites/fta.dot.gov/files/docs/PublicTransportationsRoleInRespondingToClimateChange2010.pdf.

Draft EIR, explicitly discusses Metro's commitment to regulatory compliance for safe handling of potentially contaminated soils (see page 3.9-6). Specifically, as required by SCAQMD Rule 1166, which governs emissions of volatile organic compounds (VOC) during soil decontamination, all construction contractors would employ best practices for controlling VOC emissions during excavation, grading, soil handling, and treatment. Compliance with Rule 1166 involves detailed protocols, including advance soil sampling, ongoing monitoring, and use of containment measures, where needed, which are designed to reduce potential emissions of toxic air contaminants, such as VOCs, into the surrounding environment. In compliance with Rule 1166, soil sampling would be conducted prior to and throughout construction to detect any VOC-contaminated soil and appropriate containment, handling, and disposal measures would be followed. These measures help prevent the spread of contaminants beyond the work area, effectively minimizing the potential exposure for sensitive receptors near the project alignment.

Metro completed a Phase I Environmental Site Assessment (ESA) for the Metro ROW and Hawthorne Option as part of the Draft EIR, see Appendices 3.09A and 3.09B. As described in Chapter 2, Project Description, of the Draft EIR and further detailed in Section 3.9, Hazards and Hazardous Materials, of the Draft EIR, Metro would conduct a Phase II site investigation for any properties with known or suspected contamination, and would carry out remediation measures as necessary to ensure compliance with applicable health and safety standards. The same analysis also applies to the LPA, as discussed in Chapter 4, Evaluation of Alternatives, of the Draft EIR.

22-65 Tables 2.4-1, 2.4-2, and 2.4-3 in Chapter 2, Project Description, of the Draft EIR, detail the import and export volumes anticipated during each phase of construction for the Elevated/At-Grade Alignment, the Trench Option, and the Hawthorne Option, respectively. The tables also specify the projected maximum daily truck trips required for each construction phase, providing a clear breakdown of anticipated materials movement. Construction assumptions for the LPA are included in Chapter 2, Description of the Locally Preferred Alternative, of the Final EIR, along with updates to analysis related to import and export.

Dust control measures are also thoroughly addressed in the Draft EIR. As noted in Section 3.4, Air Quality, of the Draft EIR, all contractors for the project must comply with the Metro Green Construction Policy and SCAQMD Rule 403 (Dust Control), both of which mandate effective best management practices and best available control measures to reduce dust and particulate matter emissions, as outlined in Project Feature PF-AQ-1: Metro Green Construction Policy Compliance and PF-AQ-2: SCAQMD Rule 403 Compliance on pages 3.4-24 and 3.4-25 of the Draft EIR. These practices include dust suppression strategies such as water application, use of covers on material piles, and limiting construction traffic on exposed soils. These measures ensure dust generation is minimized during the handling, import, and export of soils and materials.

22-66 See response to Comment 22-65.

22-67 See response to Comment 22-65.

22-68 The comment inaccurately suggests that the Draft EIR does not disclose the reductions in regional on-road VMT that would result from implementation of the project. The analysis provided on pages 3.4-38 and 3.4-39 of Section 3.4, Air Quality, of the Draft EIR, clearly presents these reductions in VMT for each of the three rail alignments. In the operational

year of 2042, the Elevated/At-Grade Alignment and Trench Option would each reduce daily regional VMT by 34,500 vehicle miles per day. The same analysis also applies to the LPA, as discussed in Chapter 4, Evaluation of Alternatives, of the Draft EIR. The LPA would result in the same VMT reduction as the Metro ROW alignments, and this information has been added in Section 4.9, Corrections and Additions, of the Final EIR to clarify the LPA's VMT analysis. The Hawthorne Option would reduce daily regional VMT by 34,900 vehicle miles per day.

To arrive at these reductions, the project's traffic engineers used the regional transportation model to estimate VMT reductions by calculating the difference in VMT between the Metro ROW alignments and the No Project scenario. The operational emissions analysis in Tables 3.4-18, 3.4-19, and 3.4-20 of the Draft EIR are based on these VMT reduction values, with corresponding pollutant emissions calculated by applying each pollutant's emission factor to the respective VMT reductions. This approach provides a transparent and reliable method to estimate VMT-related emissions reductions. Thus, the analysis presented in the Draft EIR is sufficient and based on the best available information available, and no further analysis is warranted.

22-69 The comment suggests that the discussion of the appropriate air quality significance thresholds provides false information, without specifying what information was inaccurate. The significance criteria outlined in Section 3.4-2.4.1 of the Draft EIR are drawn from the Appendix G of the State CEQA Guidelines. These are the same significance criteria as used by the City of Lawndale in its Draft EIR for the Lawndale General Plan Update (SCH No. 2022120088).

In terms of consistency with air quality plans, the Draft EIR evaluates the project's consistency with the SCAQMD Air Quality Management Plan (AQMP), the SCAG RTP/SCS, and the local General Plans. The SCAQMD AQMP relies on growth projections outlined in the SCAG RTP/SCS, which reflect municipal-level forecasts for population, housing, and employment in the region. This ensures that any potential increase in emissions was analyzed within the broader context of the region's air quality goals.

AB 2097 eliminates minimum parking requirements for certain development near public transit to promote housing density and reduce dependence on car travel. Its purpose is to support increased transit use and reduce VMT, thereby contributing to lower greenhouse gas (GHG) emissions. However, AB 2097 does not set or affect air quality thresholds under CEQA, nor does it govern the analysis of pollutant levels, toxic air contaminants, or emissions from the construction and operation of a transit project like this one. See response to Comment 22-73, below.

See response to Comment 22-64 regarding contaminated soils.

22-70 To clarify, the statement the City references on page 3.4-23 of the Draft EIR does not indicate that Metro is deferring mitigation. Rather, that page describes the SCAQMD's recommended approach in its CEQA Air Quality Handbook for assessing potentially significant air quality impacts, specifically cumulative air quality impacts. SCAQMD recommends that agencies consider feasible opportunities to mitigate cumulative impacts if emissions exceed regional thresholds. The cited text is part of the Draft EIR's general explanation of how air quality impacts are assessed, not a statement describing the impact determinations or mitigation measures for this project.

Of the three alignment options evaluated in the Draft EIR, only the Trench Option was determined to potentially exceed SCAQMD's mass daily threshold for nitrogen oxide (NOx) emissions during peak construction activities. This impact was addressed through Mitigation Measure MM-AQ-1: Zero or Near Zero Emissions Haul Trucks, which requires the use of low-emission trucks to minimize temporary NOx emissions during peak hauling activities. This mitigation measure would be enforced to the greatest extent feasible, factoring in the commercial availability of trucks meeting zero- and low-NOx heavy-duty-truck requirements at the time of construction. It reflects evolving market conditions and regulatory standards that continue to promote the availability of low-emission trucks. As time goes on, these heavy-duty zero- and low-NOx trucks would continue to penetrate the market to a greater and greater degree. As low-NOx heavy-duty trucks become more available, the implementation of Mitigation Measure MM-AQ-1: Zero or Near Zero Emissions Haul Trucks would remain effective at reducing NOx emissions to the extent feasible during construction, satisfying CEQA's requirements for feasible mitigation. Nonetheless, without being able to confirm that sufficient zero- and low-emission trucks would be available for use during construction of the Trench Option, the Draft EIR conservatively concludes that the Trench Option's construction air quality impact would be significant and unavoidable. If the Metro Board were to approve the Trench Option, it would be required to adopt a Statement of Overriding Considerations finding that the benefits of the Trench Option outweigh its unavoidable significant impacts.

The LPA requires far less trenching than the Trench Option. Like the Elevated/At-Grade Alignment, the LPA Alternative would not have potentially significant construction air quality impacts that would require mitigation measures. See Section 4.20 of the Final EIR, which provides clarifications to the analysis in Section 4.5-3.4.1 of the Draft EIR. As detailed in Section 4.20 of the Final EIR, the maximum daily emissions associated with construction of the LPA would be below the SCAQMD regional mass daily threshold screening levels, and construction air quality impacts of the LPA would be less than significant.

22-71 It is unclear whether the comment refers to generators that may be used during construction activities or during future operation of the project. In either case, the Draft EIR addresses potential air quality impacts from generator use both during construction and operations. Under CEQA, compliance with applicable regulatory standards could constitute substantial evidence that a project's impacts would be less than significant where compliance is reasonably expected; reliance on such regulatory schemes does not constitute improper deferral of mitigation (see e.g., *Oakland Heritage Alliance v. City of Oakland* (2011) 195 Cal.App.4th 884).

Regarding construction-phase generators, the Draft EIR explicitly describes that Metro would prioritize using grid-based electric power at any construction sites, minimizing the need for on-site generators. Should a generator be necessary, Project Feature PF-AQ-1: Metro's Green Construction Policy Compliance, described on page 3.4-24 of the Draft EIR, requires compliance with stringent emissions standards specifically designed to minimize particulate matter and pollutant emissions. This policy ensures that any potential emissions from construction-phase generators would be minimized and controlled.

As for long-term operations, generators would be located at TPSSs and would be used exclusively as emergency back-up power, operating only in the event of an electrical outage. These generators would run under infrequent testing conditions, limited to 20 to 50 hours

per year, as required under SCAQMD Rule 1470. Such testing would produce a negligible level of emissions of air pollutants.

CEQA allows for reasonable reliance on compliance with well-established regulations and permits; agencies like Metro operate under the expectation that they will follow the law (see Evid. Code Section 664).

22-72 The Draft EIR's use of 2020 air quality data is consistent with SCAQMD guidance, which recommends that the air quality setting be based on the most recent three to five years of available data. While regional emissions of pollutants may have been lower during the COVID pandemic, this period does not invalidate the ambient air quality data recorded at regional monitoring stations. Ambient air quality data, such as those recorded at the LAX Hastings monitoring station, reflect a broader trend influenced by multiple factors and are not solely determined based on short-term fluctuations in traffic volumes. As shown in Table 3.4-13 of the Draft EIR, concentrations of pollutants measured during 2020 were not substantially different from concentrations in 2018 or 2019, indicating that the data still represents typical air quality conditions. Therefore, the Draft EIR provides the best available and most representative information at the time of its preparation.

22-73 CEQA requires an analysis of growth-inducing impacts, which is provided in Section 3.16, Other CEQA Considerations, of the Draft EIR. The project is designed to serve the current and planned growth in population, housing, and employment along the corridor, rather than to induce new development. The growth-inducing analysis relies on the demographic forecasts and growth projections set forth in SCAG's 2020-2045 RTP/SCS, which includes this project in its list of planned infrastructure projects and assumes that growth would be directed toward transit stations. Therefore, the project's potential for inducing population, housing, and employment growth has been previously anticipated and is accounted for in that document.

AB 2097's elimination of parking requirements near transit, as well as other state housing incentives, aim to streamline housing development but do not require or directly create new housing or population growth. Instead, they provide flexibility for future development, which local governments must still approve based on local zoning, land use, and planning priorities. The project itself is not anticipated to exceed or drive growth beyond SCAG's projections because the South Bay area is already densely developed and planned for managed growth. Thus, the project is responsive to, but not directly responsible for, housing growth along the transit corridor.

22-74 The construction durations of the Elevated/At-Grade Alignment, Trench Option, and Hawthorne Option as described in Chapter 2, Project Description, of the Draft EIR have not changed. Construction of the LPA is expected to last for approximately six years, and is described in Chapter 2, Description of the Locally Preferred Alternative, of the Final EIR. While the overall construction duration accounts for the entire 4.5-mile corridor, work at any one location would typically last several months to a year, with crews moving progressively along the alignment. Therefore, construction activities impacting any single location would be limited in duration rather than continuous over the entire timeline. Additionally, the constraints within the Metro ROW would limit the amount of heavy-duty equipment that could operate simultaneously, which inherently reduces emissions intensity at any one location.

To address air quality impacts during construction, the Draft EIR thoroughly assessed potential impacts on sensitive receptors using conservative modeling and SCAQMD's mass daily regional thresholds and localized significance thresholds. Tables 3.4-15 and 3.4-18 of the Draft EIR summarize the regional and localized air quality impacts, demonstrating that emissions would remain below SCAQMD thresholds. The analysis used the most conservative localized significance threshold screening values due to the proximity of sensitive receptors at the edge of the Metro ROW. No potentially significant impacts to sensitive receptors were identified at either the regional or localized scale. Therefore, mitigation is not required under CEQA. The same analysis also applies to the LPA, as discussed in Chapter 4, Evaluation of Alternatives, of the Draft EIR.

22-75 The comment incorrectly suggests that details regarding fugitive dust control measures are missing from the Draft EIR. Page 3.4-25 of the Draft EIR provides a comprehensive list of best available control measures that would be implemented in accordance with SCAQMD Rule 403 to reduce fugitive dust emissions during construction.

22-76 The comment inaccurately suggests that all three alignments would require mitigation for air quality impacts. Only the Trench Option was determined to have a potentially significant air quality impact during construction, which would require mitigation. All construction activities were appropriately included in the air quality analysis for each alignment, including relocation of existing tracks, excavation, and utility relocations.

22-77 As indicated in Table 3.7-4 of the Draft EIR, all special-status species with potential to occur within the RSA are categorized by their likelihood of presence: high, moderate, or low. Species with low potential to occur lack suitable habitat within the RSA and are, therefore, not expected to be present. The trees within the RSA do not provide suitable habitat for any special-status species, aside from birds and raptors protected by the MBTA. Mitigation Measure MM-BIO-2: Nesting Bird Season Restrictions and Pre-Construction Surveys on pages 3.7-34 and 3.7-35 of the Draft EIR requires preconstruction surveys to prevent impacts to nesting birds and raptors. The same analysis also applies to the LPA, as discussed in Chapter 4, Evaluation of Alternatives, of the Draft EIR.

Regarding monarch butterflies, their preferred overwintering sites and roosting trees, such as the nonnative blue gum eucalyptus (*Eucalyptus globulus*), native Monterey pine (*Pinus radiata*), and Monterey cypress (*Cupressus macrocarpa*), among other native tree species, are not known to occur in proximity to the RSA, and no known overwintering sites are located nearby. Consequently, impacts to Monarch butterfly habitat are not anticipated. See Table 3.7-3 of the Draft EIR for a comprehensive inventory of trees and shrubs located in the Metro ROW with potential for trimming or removal. Additionally, Section 3.7-5 outlines mitigation measures to avoid and minimize impacts on sensitive biological resources.

22-78 Mitigation Measure MM-BIO-2: Nesting Bird Season Restrictions and Pre-Construction Surveys, which requires nesting bird season restrictions and pre-construction surveys, complies with CEQA and is not improperly deferred. According to CEQA Guidelines Section 15126.4(a)(1)(B), specific details of mitigation measures may be developed after project approval when it is impractical to provide those details during environmental review, as long as the agency (1) commits to implementing the mitigation, (2) adopts specific performance standards, and (3) identifies feasible actions to meet those standards. Mitigation Measure MM-BIO-2: Nesting Bird Season Restrictions and Pre-Construction Surveys meets these requirements by committing to protective actions for nesting birds and

raptors, setting clear performance standards, and identifying types of actions to achieve the protection goals for nesting birds and raptors protected under the MBTA and the CFGC.

Under Mitigation Measure MM-BIO-2: Nesting Bird Season Restrictions and Pre-Construction Surveys, vegetation clearance or demolition of potential nesting sites would be restricted outside of the nesting season, when feasible, or require pre-construction nesting bird surveys by qualified biologists within four days prior to construction start during the nesting season. The mitigation measure establishes performance standards for buffer zones around active nests (150 feet for passerine birds and 300 feet for raptors) and identifies specific actions to avoid or minimize impacts, such as monitoring nests, establishing no-disturbance buffers, and using shielding or directed lighting to prevent light encroachment into nesting habitats. Additionally, Mitigation Measure MM-BIO-2: Nesting Bird Season Restrictions and Pre-Construction Surveys mandates real-time monitoring by qualified biologists who could modify construction activities to avoid or reduce potential impacts to nesting birds, thereby ensuring adaptive protection measures are in place to meet the established performance standards. This approach complies with CEQA by providing feasible, performance-based mitigation that is appropriate for addressing biological impacts during the construction period when active nesting may occur. Thus, the mitigation measure is not improperly deferred as it provides a comprehensive and enforceable plan to protect nesting birds, employing measures that are effective, feasible, and sensitive to the changing conditions of bird nesting activity.

22-79 The assessment of potential impacts to special-status species in the Draft EIR is based on a combination of established habitat evaluation methodologies, including visual field surveys and habitat assessments conducted in November 2020, as discussed in Section 3.7, Biological Resources, of the Draft EIR. These surveys involved both a windshield survey (from a vehicle) and a pedestrian survey (surveying on foot) throughout the RSA and included photographic documentation of all parks and open spaces, which are provided in Figure 3.7-2 through Figure 3.7-13 of the Draft EIR. Section 3.7-2 of the Draft EIR includes further information regarding the survey activities conducted that inform the Draft EIR.

This methodology is consistent with standard CEQA practices, which allow an initial evaluation of potential species presence based on habitat suitability rather than requiring protocol-level surveys for every individual species during the EIR phase. The habitat evaluation and literature review conducted for the Draft EIR identified species with a low, moderate, or high potential to occur within the RSA, based on existing conditions, documented occurrences, and regional habitat characteristics. For the plant species identified with a high potential to occur (Southern Tarplant), feasible mitigation measures are proposed to reduce or eliminate the impact, Mitigation Measures MM-BIO-1: General Protection Measures to Avoid and Minimize Impacts on Sensitive Biological Resources, MM-BIO-4: Pre-construction Rare Plant Survey that require conducting pre-construction surveys to verify presence and avoid or minimize impacts, if necessary, and MM-BIO-5: Off-Site Mitigation for Southern Tarplant Habitat to identify appropriate sites for and to replant any Southern Tarplant impacted by the project.

22-80 The Draft EIR's conclusion that biological impacts would be less than significant with mitigation is based on a thorough evaluation of potential impacts and the implementation of specific mitigation measures to avoid harm to sensitive species. The Draft EIR appropriately distinguishes between potential impacts during construction and those during routine operational maintenance along the Metro ROW. Section 3.7-4.1.2 of the Draft EIR

explains that maintenance activities are not expected to result in significant impacts to biological resources, given the nature of these activities, the absence of routine disturbance to vegetation or trees that could support nesting birds, and the existing anthropogenic disturbance (e.g., vehicular traffic, train traffic, human presence) throughout the Metro ROW.

The referenced language regarding nest abandonment, failure, or mortality describes potential outcomes in the unlikely event that sensitive species were disturbed during the breeding season, but such an outcome is unlikely given the scope and character of Metro's light rail operations and associated maintenance. Routine maintenance activities conducted during project operation are limited in nature and do not typically involve vegetation removal or tree trimming that would affect nesting habitat. In the rare event that such work is required during the nesting season, maintenance activities would be performed in compliance with applicable rules and regulations of the California Department of Fish and Wildlife (CDFW), including those protecting nesting birds under the California Fish and Game Code. Routine maintenance work would be scheduled and carried out in a manner that avoids disruption to active nests, consistent with CDFW guidance. Given the limited potential for disturbance, existing anthropogenic disturbances, and the routine application of established biological avoidance protocols, the project would not result in significant impacts to nesting birds or other special-status species during operation.

22-81 See response to Comment 22-79 regarding the biological surveys conducted to inform Draft EIR. Other than the artificial sumps discussed in Section 3.7-3.3 of the Draft EIR, no other naturally occurring or created riparian or sensitive natural communities exist within the RSA. Only one sump (the Pioneer Basin in Torrance) is located adjacent to the Metro ROW, and it was constructed for flood control rather than as a natural ecosystem. As explained in Section 3.7-4.3.1 of the Draft EIR, the Pioneer Basins sump would not be impacted by project construction activities because it is situated on a bluff well above (in elevation) the Metro ROW. No impacts are anticipated to riparian fish or wildlife species due to the absence of suitable habitat within the RSA, and further detailed surveys for these species were not deemed necessary given the nature of existing conditions in the RSA.

22-82 See response to Comment 22-79 regarding the biological surveys conducted to inform the Draft EIR. As discussed in Section 3.7-3.4 of the Draft EIR, due to its urbanized nature and fragmentation of any remaining open space, no wildlife movement corridors are present within the RSA. Table 3.7-4 of the Draft EIR describes the potential for special-status species to occur, categorized as having high, moderate, or low potential. For species listed with a "low" potential to occur, there is insufficient suitable habitat to support their presence, leading to the conclusion that these species are "not expected" to occur within or near the RSA. Mitigation Measure MM-BIO-2: Nesting Bird Season Restrictions and Pre-Construction Surveys addresses the need for pre-construction nesting bird surveys for the MBTA covered species. For additional clarity, Table 3.7-4 of the Draft EIR was revised in Section 4.11, Corrections and Additions, of the Final EIR to describe that because of the lack of suitable habitat available, the species were categorized as "not expected." This revision reinforces the conclusions of the Draft EIR.

22-83 The purpose of environmental review under CEQA is to identify a project's potential impacts on the environment. Details on a project proponent's securing of a power purchase agreement does not constitute an impact on the environment. The Draft EIR addresses the project's anticipated electricity needs and the role of Southern California Edison (SCE) as the

energy provider in several sections. Section 3.12-4 of the Draft EIR evaluates the potential for the project to result in a significant impact due to wasteful, inefficient, or unnecessary consumption of energy resources during project construction and operation (see page 3.12-22 of the Draft EIR) and to conflict with or obstruct a state or local plan for renewable energy or energy efficiency (see page 3.12-27 of the Draft EIR). Additionally, page 3.4-37 of the Draft EIR discusses SCE's supply of electricity to the project, and page 3.5-19 of the Draft EIR discusses SCE's ongoing trajectory toward reducing reliance on non-renewable resources, consistent with California's renewable energy goals. Pages 3.11-9, 3.11-17, and 3.11-26 of the Draft EIR describe SCE's role as the project's electrical provider and the general methods by which electricity would be delivered to project components, including the traction power substation units and traditional distribution connection facilities (e.g., power poles, underground wires, transmission lines, and distribution lines).

Power purchasing agreements are typically arranged pursuant to established regional power grids and utilities. However, CEQA does not require that specific power purchasing agreements be in place prior to environmental review or project approval. Indeed, such an agreement might violate CEQA as CEQA requires environmental review to be completed prior to an agency's approval of a project. Should a power purchasing agreement with SCE be necessary, it would proceed through the California Public Utilities Commission (CPUC) as a separate, standard regulatory process. As described above, this CEQA analysis appropriately addresses energy impacts by assessing the project's energy needs and impacts and confirming SCE's supply capacity and California's commitment to renewable energy sources.

22-84 The language referenced on page 3.12-11 of the Draft EIR pertains to Metro's general energy conservation and management plans, policies, and initiatives which include plans for solar installations at various Metro facilities. This paragraph does not discuss project specifics, and the solar panels mentioned are not components of the project but are related to a different Metro project. The project does not include solar panels at this stage of the preliminary design.

22-85 The City states that mitigation measures would be needed in the event of an earthquake. Under CEQA, however, an EIR must analyze the project's impacts to the environment, rather than the environment's potential impacts on the project, unless the project would exacerbate existing hazards to create new risks. As described in Section 3.8, Geology, Soils, and Paleontological Resources, of the Draft EIR, construction and operation of the project would result in no impact for increased risk of loss, injury, or death due to fault rupture, because the project doesn't traverse any fault zones. Additionally, there would be a less than significant impact for risk of loss, injury, or death involving strong seismic ground shaking during both construction and operation, due to the project's adherence to applicable seismic design standards. Modern engineering and construction practices would ensure that the project complies with seismic safety codes, which are designed to protect structures and users against seismic risks. The design and construction methods would also provide a safe working environment for workers. As a result, additional mitigation measures are not necessary under CEQA, as no substantial seismic risk impact to the environment has been identified.

22-86 As stated in Section 3.8, Geology and Soils, of the Draft EIR, the Elevated/At-Grade Alignment and Trench and Hawthorne Options are not located in earthquake-induced landslide zones. As shown in Figure 3.8-4, the nearest CGS mapped landslide zone is over

1.5 miles away. Therefore, the impact is less than significant. The same analysis also applies to the LPA, as discussed in Chapter 4, Evaluation of Alternatives, of the Draft EIR.

22-87 Section 3.5, Greenhouse Gas Emissions, of the Draft EIR includes a comprehensive GHG emissions impact analysis, including short-term construction impacts and long-term operational impacts. This analysis includes baseline data, regulatory standards, and quantified emissions calculations, which demonstrate that the project would not generate significant GHG emissions. Therefore, there is no requirement to mitigate emissions. The project would reduce regional GHG emissions when considering the reduction of passenger vehicle trips associated with increased transit ridership. The LPA would follow the Metro ROW for the entire length of the project and would be entirely grade-separated. Thus, the LPA would result in similar VMT- and GHG-reduction benefits as the Elevated/At-Grade Alignment and Trench Option. The statement that building public transportation would reduce VMT is supported by the traffic and air quality models used, which are based on regional travel behavior patterns and supported by SCAG's RTP/SCS. Therefore, the project would result in a beneficial effect with regard to GHG emissions. For additional information regarding the Draft EIR's quantified VMT and emissions analysis, refer to response to Comment 22-68.

22-88 Metro acknowledges that the Lawndale Air Quality Management Plan and Climate Action Plan do not specifically reference a light rail system. However, both plans contain goals and policies that generally support enhanced public transit systems aimed at reducing emissions and dependence on single-occupant vehicles, as shown in Table 3.5-3 on page 3.5-10 of the Draft EIR. For example, Goal 2 of the City's Air Quality Management Plan states, "Reduce reliance on single-occupant vehicles and reduce the number of non-work and commuting trips." As discussed in response to Comment 22-87, the project would have a net positive effect on reducing GHG emissions by shifting trips from passenger vehicles to public transit. This beneficial GHG emissions effect is broadly consistent with GHG reduction plans.

22-89 See response to Comment 22-88.

22-90 See Section 3.5, Greenhouse Gas Emissions, of the Draft EIR. The methods to calculate emissions are described in detail in Sections 3.5-2.2 and 3.5-2.3 of the Draft EIR for both construction and operation, including the data used as well as the calculations performed.

22-91 Section 3.5-2.1 of the Draft EIR states the analysis of potential environmental impacts related to GHG emissions is the six-county geographic region under the jurisdiction of SCAG, which includes Los Angeles, Imperial, Orange, Riverside, San Bernardino, and Ventura Counties.

22-92 The greenhouse effect is a concept in atmospheric science that describes the process by which certain atmospheric gases, referred to as Greenhouse Gas Emissions (GHGs), absorb energy from sunlight within the Earth's atmosphere and prevent it from being released back into space. This mechanism is responsible for maintaining a warm, habitable environment on the planet's surface based on the equilibrium concentrations of the gases. As discussed on page 3.5-13 of the Draft EIR, GHGs, unlike localized air pollutants, contribute to climate change by affecting global atmospheric conditions (rather than directly impacting air quality at specific localized points). This is because GHGs have long atmospheric lifespans, and their emissions distribute and mix across large regions, even globally, rather than accumulating in concentrated areas. Consequently, evaluating GHG emissions at a regional level provides a more accurate and effective approach for assessing the potential climate-related impacts of

the project. A localized analysis would not yield meaningful distinctions in the context of the effects of GHG emissions.

22-93 The City appears to misunderstand the approach for analyzing GHG emissions. For construction-related GHG emissions, which are temporary by nature, the Draft EIR follows the SCAQMD Draft Guidance Document – Interim CEQA Greenhouse Gas (GHG) Significance Threshold (2008), which states that for CEQA assessments, construction-related GHG emissions that occur over a relatively short-term period should be amortized over a 30-year operational project lifetime. This approach reflects the fact that GHGs persist in the atmosphere long after they are emitted and contribute cumulatively to climate change over time, rather than having isolated, short-term effects like many other pollutants. Spreading out the temporary GHG emissions from construction over the project's lifespan allows for a fair comparison with the long-term GHG reductions achieved through increased transit ridership, which lowers regional vehicle emissions overall. The GHG emissions impact analysis beginning on page 3.5-25 of the Draft EIR demonstrates that there would be a net decrease in GHG emissions due to the project. Therefore, there is no requirement to mitigate emissions, although compliance with Metro's Green Construction Policy would further minimize emissions through the use of best management practices and low-emission equipment.

22-94 The comment correctly notes that clarification was needed regarding the construction timeline. Section 4.9, Corrections and Additions, of the Final EIR has been updated and correctly states the construction time period. As with any large-scale project, minor scheduling adjustments may occur. This update does not alter the conclusions of the Draft EIR regarding construction-related impacts.

22-95 The City questions the well-established link between expanded public transit options and regional GHG-emission reductions, as well as the expectation that this project would reduce VMT through increased transit ridership. This relationship is substantiated by the California Air Resources Board (CARB) and the California Office of Planning and Research (OPR), both of which affirm that expanding and improving transit options directly support climate change adaptation strategies by reducing dependence on single occupancy vehicles. CARB's 2017 Climate Change Scoping Plan (2017) and the 2022 Scoping Plan for Achieving Carbon Neutrality (2022) describe this interconnected approach to transit and climate action. As discussed on page 3.5-20 of the Draft EIR, OPR's Technical Advisory – CEQA and Climate Change: Addressing Climate Change Through California Environmental Quality Act (CEQA) Review (2008) and the Discussion Draft CEQA and Climate Change Advisory (2018) provides similar guidance.

Further, as noted in Section 3.1, Transportation, of the Draft EIR, under CEQA Guidelines Section 15064.3(b)(2), transportation projects that reduce, or have no impact on, VMT should be presumed to cause a less than significant transportation impact and do not require VMT analysis. OPR's Technical Advisory on Evaluating Transportation Impacts in CEQA explains that transit and active transportation projects generally reduce VMT and, therefore, are presumed to cause a less than significant impact on transportation. This presumption extends to passenger rail projects, like this one, expected to reduce VMT.

Regarding vehicle trips to the stations, those trips would be outweighed by the net regional VMT and GHG reductions achieved by taking those vehicles off the road for the majority of each trip. This approach is widely supported, as illustrated by California SB 375, which links transportation and land use policy to climate goals by prioritizing VMT reductions through

increased transit use. By enabling efficient public transit access, the project supports California's climate adaptation goals and would have a beneficial impact on regional air quality and GHG emissions. See also response to Comments 22-63 and 22-68.

22-96 The operational parameters in the Draft EIR are based on the travel demand modeling performed for the project. This modeling is included in the 2023 Ridership Report, published concurrently with the Draft EIR. The report includes a description of the methodology to calculate VMT.

22-97 The City incorrectly asserts that the Draft EIR includes deferred mitigation measures to reduce GHG emissions. The GHG emissions impact analysis beginning on page 3.5-25 of the Draft EIR demonstrates that impacts would not be significant, and therefore, mitigation would not be required.

Furthermore, as discussed on page 3.5-19 of the Draft EIR, annual GHG emissions associated with electricity consumption for the project were estimated by multiplying the total annual electricity demand in megawatt-hours by the forecasted 2042 SCE delivered power mix carbon intensity factor. According to SCE's prepared forecasts of the projected carbon intensity of their future delivered power to customers, the GHG intensity factor in 2042 would be approximately 263 pounds of carbon dioxide equivalent per mega-watt hour. Thus, the Draft EIR's analysis of GHG emissions associated with the project does not rely on assumptions of 100% renewable energy.

22-98 Page 3.5-20 of Section 3.5-2.4 of the Draft EIR accurately states that the SCAQMD has not adopted a CEQA significance threshold associated with GHG emissions from transit projects. The project would not affect the frequency of freight rail activity in the corridor or alter associated GHG emissions. Freight rail emissions would be identical under the existing and future conditions regardless of the project, as the project does not propose any changes to existing freight operations.

Section 3.5-2.5 of the Draft EIR discusses the parallels of benefits associated with expanding transit infrastructure and reducing VMT and GHG emissions, based on the two OPR guidance documents described in the chapter.

22-99 It is unclear what wall the City is referring to. The analysis of construction-related GHG emissions considered all construction activities that would occur for the project.

22-100 Sections 3.5-3.1 and 3.5-3.2 of the Draft EIR discuss existing conditions associated with California GHG emissions and GHG emissions from the Metro transit system. This appropriately characterizes the existing condition given the statewide and regional nature of GHG emission effects and climate change.

22-101 The analysis is based on reliable data that captures realistic long-term ridership trends. Section 3.5-3.3 of the Draft EIR provides context on the COVID-19 pandemic's effects on commuting and transit use patterns, acknowledging that transit ridership temporarily declined in 2020 and 2021 due to increased remote work and altered travel habits. The discussion notes a recovery in commute frequency and transit ridership, suggesting a gradual return to pre-pandemic patterns. The analysis relies on the best available transportation data to date, including projections from the University of California, Davis (2022). While the City suggests that long-term post-pandemic transit trends should be fully analyzed now, it is premature to reach definitive conclusions. The existing data offers a

strong foundation, and as the Draft EIR explains, current studies anticipate a continued return toward pre-pandemic levels. See MR-15: Metro Ridership Forecasting Methodology.

Given the unique and temporary nature of the COVID-19 pandemic, the analysis relied on pre-pandemic (2019) data to forecast emissions and ridership. As discussed on page 3.5-19 of Section 3.5, Greenhouse Gas Emissions, of the Draft EIR, implementation of the project would indirectly affect regional GHG emissions through the displacement of on-road vehicle trips and VMT, which is key and one of the primary tenets of GHG-emission-reduction strategies for the SCAG region. Regional transportation modeling was performed to estimate daily VMT on the roadway network under existing conditions (2019) and in 2042 with and without the project.

22-102 The City cites a table number that does not exist in the Draft EIR. For the purposes of this response, Metro assumes the intended reference is to Table 3.5-13, on page 3.5-26 of the Draft EIR, which presents the estimated GHG emissions associated with construction. This table intentionally does not include baseline GHG emissions for comparison to construction-related GHG emissions because, per SCAQMD staff guidance (discussed on page 3.5-26 of the Draft EIR), GHG impacts from construction should be amortized over a 30-year operational project lifetime, rather than directly compared to baseline emissions. This approach accounts for the inherently cumulative nature and long-term atmospheric persistence of GHGs. See response to Comment 22-93 for additional information regarding the construction-related GHG emissions analysis and SCAQMD guidance.

22-103 See response to Comment 22-103. The same methodology for construction-related GHG emissions impacts was applied for the Trench Option.

22-104 As discussed on page 3.5-19 of the Draft EIR, implementation of the project would reduce regional GHG emissions through a shift from passenger vehicles to public transit, thereby reducing VMT. This displacement of on-road vehicle trips is one of the primary tenets of GHG emissions reduction strategies for the SCAG region, as outlined in SCAG's 2020-2045 RTP/SCS. See response to Comment 22-95 regarding the well-established link between reduced VMT and GHG emissions reductions.

Table 3.5-16 of the Draft EIR summarizes annual average GHG emissions and shows the project would reduce GHG emissions compared to the baseline conditions. Therefore, no mitigation measures are needed. See response to Comments 22-63 and 22-68 regarding the Draft EIR's analysis of VMT reductions, as well as response to Comment 22-102 and MR-15: Metro Ridership Forecasting Methodology.

22-105 The comment misinterprets the scope and conclusions of the GHG emissions analysis in the Draft EIR, incorrectly asserting that no studies were conducted for the analysis. Section 3.5, Greenhouse Gas Emissions, of the Draft EIR, provides a thorough, quantitative analysis of GHG emissions that would be generated during both construction and operation of the project, which is summarized in Tables 3.5-13 and 3.5-16, respectively. This analysis includes projections based on established methodologies for construction emissions and considers the project's long-term role in reducing VMT by providing a high-quality transit alternative. The project's compliance with plans, policies, and regulations adopted to reduce GHG emission, such as Metro's Green Construction Policy, the 2019 Climate Action and Adaptation Plan, and the Moving Beyond Sustainability Strategic Plan, is fully documented and contributes to ensuring the project's consistency with these initiatives.

The comment also inaccurately suggests that idling at rail crossings would lead to significant unmitigated GHG impacts. Any minor GHG emissions from vehicles idling at rail crossings would be negligible when compared to the significant reduction in GHG emissions from displaced vehicle trips regionwide. It should also be noted that the LPA (as well as the Trench and Hawthorne Options) would entirely eliminate this concern, as the light rail would be fully grade-separated, meaning that light rail operations would not interrupt vehicle traffic at crossings, avoiding any potential idling emissions at intersections.

22-106 The comment incorrectly asserts that the cumulative impact discussion in the Draft EIR lacks information on certain project elements, such as soundwalls and bridge widening. Section 3.5, Greenhouse Gas Emissions, of the Draft EIR assesses GHG emissions for the entire project, and all project components, including soundwalls, bridges, and other structures, were fully accounted for in the construction vehicle and equipment assumptions underlying the emissions calculations. GHG emissions are inherently cumulative, as they contribute to global climate change regardless of individual project elements. The Draft EIR explains this cumulative nature of GHG impacts on page 3.5-13. Therefore, the analysis appropriately addresses cumulative GHG emissions by evaluating all anticipated emissions associated with construction and operations of the project, consistent with CEQA.

22-107 The comment quotes SB 743. No response is required.

22-108 The environmental studies prepared during the Draft EIR phase meet CEQA's requirements for evaluating potential impacts from hazardous materials. A Phase I Environmental Site Assessment (ESA) was conducted to identify recognized environmental conditions (RECs), including the Allied Petroleum corporate well, which is documented in Section 3.9, Hazards and Hazardous Materials, of the Draft EIR. This well is noted as a plugged and abandoned dry hole per California Energy Management Division (CalGEM) records, indicating it no longer poses significant environmental risks.

The Phase I ESA performed for the Draft EIR provides sufficient information to assess the project's potentially significant impacts related to hazards and hazardous materials. Conducting a Phase II investigation, which includes soil and groundwater sampling to confirm the presence or absence of contamination identified in the Phase I ESA, is standard practice for the preliminary design phase of development projects and would be required per Metro's standard property acquisition requirements.

22-109 See MR-8: Light Rail and Freight Train Safety.

22-110 This comment reflects a policy-level disagreement regarding the interpretation of the land use goal cited by the comment. Additionally, the City is speculating, as no evidence is provided to support the claim that the project would diminish the area's aesthetic character and attractiveness; CEQA does not require an analysis of speculation. Metro's assessment indicates that the project would support local and regional objectives by enhancing public transit, reducing VMT, and improving air quality, thereby contributing positively to environmental quality, mobility, and public health. The project would also incorporate design elements to preserve and enhance visual character, as well as safety features to promote a safe urban community. The City's policy disagreement with the Draft EIR conclusions is noted and would be considered by the Metro Board during its deliberations on whether to approve the project. See MR-10: Changes to Community Character.

22-111 As a light rail extension, the project is consistent with the current transportation function of the Metro ROW and would not change the development patterns adjacent to it. The project is consistent with Policy 1a of the City's 1991 General Plan Land Use Element in that the project would maintain the existing Metro ROW for transportation use, which is distinct from introducing new development. Notably, at the request of the City of Lawndale provided during the 2018 Supplemental Alternatives Analysis outreach process, Metro removed a station within the City of Lawndale from further consideration, a decision which respects the City's land use goals and is consistent with Policy 1a by maintaining the transportation function of the Metro ROW without introducing new development density or high-traffic stations within Lawndale's residential areas. Stations are instead planned at the South Bay Galleria and Torrance TC. This approach supports both the City of Lawndale's land use goals and regional mobility objectives while preserving the residential character of the Metro ROW area within the city. For additional information, see MR-10: Changes to Community Character.

22-112 The City does not specify what is found to be false in the table.

22-113 As shown in Section 4.6, Corrections and Additions, of the Final EIR, the text of Table 3.2-2, of the Draft EIR, has been revised to state "City of Lawndale Zoning Regulations," the intended meaning. The revision does not change the analysis or conclusions of the Draft EIR.

22-114 See response to Comment 22-111.

22-115 While change in community character does not constitute a significant impact under CEQA, Section 3.2, Land Use, and Section 3.3, Aesthetics, of the Draft EIR, analyze the project's potential to physically divide communities and to affect visual resources within existing communities. As discussed in these sections of the Draft EIR, the project would result in less than significant land use and aesthetic impacts. The potential for LPA impacts is addressed in Chapter 4, Evaluation of Alternatives, of the Draft EIR. See MR-10: Changes to Community Character. In addition, the LPA light rail guideway (as well as the Trench and Hawthorne Options) would be fully grade-separated from all roadways, further reducing the potential for physical division.

22-116 The comment appears to misunderstand the scope and nature of the project, as it does not include commercial or residential components. The project would extend the Metro C (Green) Line from the Redondo Beach (Marine) Station to the Torrance TC. Sensitive receptors, including residential areas within 350 feet of the alignment, have been carefully assessed for potential noise and vibration impacts in the Draft EIR. Where impacts were identified, appropriate mitigation measures have been proposed to reduce significant impacts to the maximum extent feasible. The LPA would result in less than significant operational noise and vibration impacts with mitigation. See MR-2: Operational Noise Analysis Methodology and Impact Thresholds and MR-3: Operational Noise Project Features and Mitigation Measures.

22-117 See MR-2: Operational Noise Analysis Methodology and Impact Thresholds; MR-3: Operational Noise Project Features and Mitigation Measures; MR-4: Potential Negative Health Effects Related to Noise, Vibration, and Air Quality; and MR-5: Vibration Impact Types and Impact Thresholds for more information.

The comment references the National Geographic Encyclopedia's statement on sound levels and hearing damage; however, this general information on noise levels and health impacts does not directly apply to the project's specific noise environment as analyzed in the Draft

EIR. The project noise levels from intermittent train pass-bys are significantly lower than continuous noise sources commonly associated with health impacts like hearing damage, such as prolonged exposure to industrial equipment or continuous loud music. The Draft EIR addresses relevant noise levels in Section 3.6, Noise and Vibration, noting that train noise would reach approximately 78 dBA at a speed of 50 mph, decreasing significantly when indoors. This level is below the Occupational Safety and Health Administration (OSHA) continuous exposure threshold of 85 dBA, which is based on protecting against hearing loss from prolonged, uninterrupted noise.

Furthermore, unlike persistent or continuous loud noises, which National Geographic highlights as problematic, transit-related noise is brief and intermittent. Even during peak service times, when trains pass every five minutes, the equivalent hourly noise level (63.7 dBA) remains substantially below the OSHA threshold, indicating no risk of hearing damage. The project also includes mitigation measures to reduce noise impacts to sensitive receptors, including soundwalls and quiet zones, further addressing potential disturbances.

22-118 The comment mischaracterizes the Draft EIR analysis. The FTA Noise and Vibration Impact Assessment Manual identifies the potential for "wheel squeal" on curves with a radius of less than 1,000 feet. Noise associated with the steel wheels rolling on steel rails is included in the operational noise calculations, as discussed on page 3.6-46 of the Draft EIR. The Draft EIR utilizes the FTA Noise and Vibration Impact Assessment Manual's standards, which account for all noise sources associated with train movement, including steel wheel noise. Maintenance of vehicle wheels and tracks would be part of Metro's standard operation and maintenance protocols to ensure proper functioning of the transit line. The Metro ROW alignments, including the LPA, through the City of Lawndale do not include any small-radius curves with a radius of less than 1,000 feet, and therefore, wheel squeal is not expected in this area. However, Metro remains committed to minimizing potential noise impacts. As final engineering progresses, Metro would continue to evaluate track conditions and noise mitigation needs, consistent with Section 4.2.12.3 of the Metro Rail Design Criteria, which requires lubricators in locations where wheel squeal or excessive wheel wear is anticipated. Should it be determined that rail lubricators are warranted, they would be incorporated into the project accordingly. For the Hawthorne Option, as discussed on page 3.6-76 of the Draft EIR, Mitigation Measure MM-NOI-5: Wheel Squeal Monitoring would be implemented to reduce the potential impact of wheel squeal for that option to a less than significant level.

22-119 Soundwalls were thoroughly considered in the Draft EIR under Mitigation Measure MM-NOI-2: Soundwalls, and in the analysis set forth in Section 3.6-6, Project Impacts Remaining After Mitigation. The locations of the proposed soundwalls are shown in Figures 3.6-21 through 3.6-24 of the Draft EIR, and described in Tables 3.6-26, 3.6-31, and 3.6-33, for the Elevated/At-Grade Alignment, Trench Option, and Hawthorne Option, respectively. The effectiveness of these soundwalls is discussed in detail on pages 3.6-100 (Elevated/At-Grade Alignment), 3.6-103 (Trench Alignment), and 3.6-104 (Hawthorne Option). The locations and effectiveness of the proposed soundwalls for the LPA are described in Section 4.21, Corrections and Additions, of the Final EIR. No new soundwalls beyond those already described in the Draft EIR as part of the Elevated/At-Grade Alignment or Trench Option are required for the LPA. See also response to Comment 22-45, regarding the analysis of aesthetic impacts of the proposed soundwalls.

22-120 See MR-5: Vibration Impact Types and Impact Thresholds.

22-121 See MR-5: Vibration Impact Types and Impact Thresholds.

22-122 As described in Mitigation Measure MM-NOI-4: Quiet Zone Establishment on page 3.6-97 of the Draft EIR, the Quiet Zone implementation would eliminate freight horn sounding at freight crossings from north of Inglewood Avenue to south of 182nd Street, including 159th Street, 160th Street, 161st Street, 162nd Street, and 170th Street, within the City of Lawndale. This mitigation measure was analyzed for its noise-reducing effects at these crossings, as described on page 3.6-50 of the Draft EIR. Chapter 2, Project Description, of the Draft EIR describes the types of "quiet zone ready" equipment proposed, consistent with the Federal Railroad Administration (FRA) criteria for quiet zones. This would include the use of "supplemental safety measures" (SMMs) established by FRA to ensure that safety at crossings is maintained without the need for horn sounding. Figures 3.6-21 and 3.6-22 of the Draft EIR show the crossings where fright horn noise was excluded from the noise impact calculations, reflecting the impact of the Quiet Zone implementation on noise reduction. Therefore, the implementation of a Quiet Zone and the associated noise impact reductions have been thoroughly evaluated, and no further analysis is required to determine the efficacy of a Quiet Zone as a noise mitigation measure.

22-123 The Noise Control Plan in Mitigation Measure MM-NOI-1: Noise Control Plan is not deferred mitigation, as it sets clear, enforceable requirements that the contractor must follow to ensure compliance with the specific performance standards (i.e., FTA criteria) set forth in the measure. Per Mitigation Measure MM-NOI-1: Noise Control Plan, prior to starting localized construction, Metro's contractor must prepare the Noise Control Plan, which a board-certified engineer must design to meet the FTA 1-hour L_{eq} noise standards for different land uses. These standards include limits of 90 dBA L_{eq} for residential areas during the day and 80 dBA L_{eq} at night, and 100 dBA L_{eq} for commercial and industrial areas both day and night. The Noise Control Plan must provide specific noise-reducing actions, such as utilizing noise-reducing equipment, temporary noise barriers, and routing construction traffic away from sensitive residential streets. The plan must require pre-construction noise assessments and continuous noise monitoring to ensure compliance with FTA standards. Additionally, the contractor must establish a public complaint system to address any concerns within 24 hours, thus providing an additional layer of accountability. These requirements ensure construction noise impacts are managed in a highly controlled and systematic way to meet the quantified FTA noise criteria. Accordingly, Mitigation Measure MM-NOI-1: Noise Control Plan is not deferred mitigation. See MR-3: Operational Noise Project Features and Mitigation Measures.

22-124 The City appears to confuse vibration-related mitigation with construction noise impacts. Mitigation Measure MM-VIB-3: Pre- and Post-Construction Surveys specifically addresses potential vibration impacts, not noise, and is intended for the protection of nearby structures. As noted in Section 3.6, Noise and Vibration, of the Draft EIR, this measure applies to construction activities for the Elevated/At-Grade Alignment along the Metro ROW near Grant Avenue, where there is one structure with potential for vibration-related structural impacts during construction of a new freight bridge. In addition, it should be noted that the LPA would not shift freight tracks in this area and would not require a new freight bridge to be constructed. Thus, the LPA would not result in construction vibration impacts with the potential for structural damage.

22-125 The Draft EIR analyzes the combined noise impacts from the light rail and freight operations. Mitigation measures are included in Section 3.6-5 of the Draft EIR that would address noise from the combined freight and light rail operations. Page 3.6-50 of the Draft EIR evaluates

the effectiveness of the mitigation at reducing the combined impacts of freight and light rail operations. See MR-3: Operational Noise Project Features and Mitigation Measures for additional detail on the proposed noise mitigation measures.

22-126 The City states that the Draft EIR does not follow CEQA requirements for analyzing population and housing impacts generated by the project. CEQA requires analysis of population and housing impacts primarily in the context of growth-inducing impacts, which are addressed in Section 3.16-1 of the Draft EIR. The project is consistent with regional plans and is not expected to induce unplanned growth that would exceed SCAG's previously anticipated demographic forecasts. See response to Comment 22-73 for additional information regarding growth-inducing impacts.

22-127 See MR-14: Property Values and Impacts to Businesses. The comment states that studies show that property values show that property values near rail lines are negatively impacted but does not cite any specific study supporting this conclusion.

22-128 See MR-18: Homelessness, which includes information regarding Metro's "Response to Homelessness Motion." CEQA requires analysis of potential physical changes to the environment directly or indirectly resulting from a project, but it does not require a speculative assessment of potential social impacts. While the City associates light rail transit with attracting individuals experiencing homelessness, this is not a direct environmental impact of the project itself, nor does it require the construction of new homeless shelters. The presence or movement of individuals near transit facilities is influenced by broader social and economic factors beyond the scope of this project. Moreover, light rail projects, such as this one, typically include security measures, as noted in MR-9: Light Rail Security, designed to maintain the safety and accessibility of transit facilities. Ultimately, no substantial evidence suggests that the project would increase unhoused populations in a way that would cause significant physical environmental changes under CEQA.

22-129 The City references 49 Code of Federal Regulations (C.F.R.) Section 38.85, which is a federal regulation adopted pursuant to the Americans with Disabilities Act (ADA). While the Draft EIR does not include an exhaustive list of all design criteria, the project would be required to comply with all applicable federal, state, and local regulations, including federal regulations related to ADA-compliant design features for light rail transit systems. Specific design measures to prevent inadvertent entry between cars, such as barriers, warning devices, or other ADA-compliant features, would be incorporated as part of the project's final design phase, follow the relevant regulatory standards to ensure safety and accessibility for all passengers, and verified as part of the planning process.

22-130 Although the Draft EIR does not include an exhaustive list of all design criteria, the project would be required to be designed in accordance with all applicable regulations and design criteria, including those related to fire protection. It should also be noted that the project is not an underground light rail system. Compliance with applicable fire protection standards, which would be verified during the planning process, would ensure that all necessary fire protection systems and procedures are implemented.

22-131 See MR-12: Emergency Access and response to Comment 22-5. As described on page 3.15-32 of the Draft EIR, Metro recognizes that temporary roadway closures may be required during construction activities, which could impede the vehicle circulation network, including emergency access. However, as noted on page 3.1-15, Project Feature PF-T-1: Construction Traffic Management Plan requires Metro to coordinate with local agencies, including

emergency service providers, to maintain emergency access to nearby land uses. Therefore, the project would not significantly impact emergency services during construction.

Both the Trench Option and the LPA would fully grade separate the light rail within the Metro ROW, meaning that the light rail would operate independently from the roadway network. This separation would avoid potential congestion at arterial crossings, such as Inglewood Avenue and Manhattan Beach Boulevard, ensuring that operational wait times for emergency vehicles are unaffected by the LPA.

22-132 See MR-12: Emergency Access and response to Comments 22-5 and 22-131.

22-133 The City cites findings from a Blue Zones study that are not directly related to the project, the Draft EIR, or the CEQA analysis. The project does not include widening roads to increase vehicle capacity or raising speed limits. Any roadway modifications would be limited to those necessary to implement the light rail transit system. See MR-4: Potential Negative Health Effects Related to Noise, Vibration, and Air Quality.

22-134 Chapter 2, Project Description, of the Draft EIR, describes various enhancements that Metro has committed to incorporating as part of the project, including the addition of multi-use recreational paths and the installation of quiet zone equipment at existing freight crossings along the Metro ROW. These enhancements go beyond the basic operational requirements of the project and would provide added value to the communities the project would serve. While CEQA primarily focuses on identifying and mitigating potential environmental impacts rather than cataloging public benefits, these community-focused improvements reflect Metro's ongoing efforts to deliver positive outcomes to affected communities whenever possible as a part of its projects.

22-135 The Draft EIR thoroughly evaluates potential transportation impacts, including impacts to pedestrian and bicycle facilities and safety hazards, with particular consideration for nearby schools. Section 3.1, Transportation, of the Draft EIR, evaluates these impacts and describes infrastructure enhancements that would improve safety at railroad crossings along the Metro ROW, going above and beyond the existing warning devices for the freight rail line. See MR-8: Light Rail and Freight Train Safety for more information regarding safety infrastructure improvements that would be implemented as part of this project. With respect to the City's concerns about the effect of light rail operations on children's health, learning environments, and daily routines, the Draft EIR addresses these topics across several environmental issue areas. For example, potential health impacts from air quality, noise, and hazardous materials are addressed in Section 3.4, Air Quality, and Section 3.9, Hazards and Hazardous Materials; potential impacts related to noise are addressed in Section 3.6, Noise and Vibration, of the Draft EIR. The analyses in these sections reflect applicable regulatory requirements and include mitigation measures, where necessary, to reduce impacts. See MR-4: Potential Negative Health Effects Related to Noise, Vibration, and Air Quality.

The LPA—similar to the Trench Option and Hawthorne Option—would fully grade separate the light rail from all roadway crossings, ensuring that light rail operations do not interact with road traffic, pedestrians, or cyclists at grade level.

22-136 The City raises concerns regarding the analysis of traffic impacts on local roadways and Caltrans freeways. However, as noted in MR-11: Traffic Delay and Level-of-Service and response to comment 21-2, "traffic impacts," as measured by intersection delay and level of service (LOS), are no longer considered an environmental impact criterion. Nonetheless,

these issues were evaluated in Metro's separate 2023 Transportation Detail Report, published online concurrently with the Draft EIR. That report addresses roadway and intersection conditions along and intersecting with the Proposed Project and its Options. The commentor also references Interstate 405 (I-405), although the project does not intersect with or restrict access to or from this freeway. The project would provide a high-capacity and fast transit option that would attract riders to the Metro rail network and reduce driving on local and regional roadways. The Draft EIR adheres to the CEQA Guidelines' updated transportation impact criteria, including vehicle miles traveled (VMT).

22-137 See MR-1: Selection of Alternatives.

Figure ES-15 of the Draft EIR shows an at-grade light rail segment within Lawndale, but this segment does not have any at-grade light rail crossings. Therefore, the Draft EIR accurately describes grade separations. No changes were made in the Final EIR in response to this comment. Regarding effects on intersections, see MR-11: Traffic Delay and Level-of-Service.

22-138 See MR-11: Traffic Delay and Level-of-Service.

22-139 The City is mistaken in stating that the Draft EIR identifies traffic impacts as significant and unavoidable. As shown in Table ES-2 of the Draft EIR, no significant and unavoidable transportation impacts were identified. The Draft EIR follows CEQA's required transportation impact methodologies, focusing on VMT rather than traditional intersection delay metrics, consistent with CEQA and the CEQA Guidelines. Using these methodologies, the analysis concludes that the Elevated/At-Grade Alignment and Options would have less-than-significant transportation impacts. Under CEQA, the lead agency evaluates alternatives and mitigation where impacts are deemed significant. However, because transportation impacts were determined to be less than significant, feasible mitigation measures or alternatives are not necessary to reduce traffic-related impacts. Similar to the Elevated/At-Grade Alignment, the transportation impacts of the LPA would be less than significant. See MR-11: Traffic Delay and Level-of-Service.

22-140 The City quotes *Sierra Club v. Gilroy City Council (6th Dist. 1990) 222 Cal.App.3d 30, 41,* which, in turn, quotes Section 21002 of the Public Resources Code. As noted in response to Comment 22-139, CEQA does not require lead agencies to adopt mitigation measures or alternatives for impacts that are determined to be less than significant. Where the Draft EIR identifies potentially significant impacts, it also identifies mitigation measures and/or alternatives to reduce or avoid those impacts.

22-141 See response to Comment 22-139. Although none of the potentially significant impacts identified in the Draft EIR relate to transportation, the Draft EIR does identify other significant and unavoidable impacts. These are summarized in Section 3.16-3. Should the Metro Board determine to approve the project, the Board would be required to adopt CEQA Findings of Fact and a Statement of Overriding Considerations, as required by Public Resources Code Section 21081.

22-142 The project objectives outlined in Chapter 2, Project Description, of the Draft EIR, are centered on providing high-capacity, sustainable transit solutions in the South Bay to improve mobility, reduce congestion and air pollution, and enhance regional connectivity. These objectives emphasize improved transit access, reduced VMT, and increased connectivity within the South Bay, specifically along the corridor between the current terminus at the Redondo Beach (Marine) Station and Torrance. Meeting these objectives necessitates a project scale that could effectively serve the high demand for transit in this

dense urban area and support meaningful mode shifts from single-occupant vehicles to transit options.

Chapter 4, Evaluation of Alternatives, of the Draft EIR, evaluates a reasonable range of potentially feasible alternatives that were specifically chosen to meet most of the basic project objectives while also substantially reducing or avoiding one or more significant impacts. This range includes the No Project Alternative (required pursuant to CEQA Guidelines Section 15126.6(e)), the High-Frequency Bus Alternative, and the LPA.

The comment suggests that a "smaller scale" alternative should be evaluated. However, the High-Frequency Bus Alternative does reflect a scaled-down approach to the project that still meets many of the project objectives. This alternative would utilize high-frequency bus service rather than light rail, helping to achieve the project's core objectives, such as improving mobility within the South Bay and transit accessibility and providing an alternative mode of transportation for commuters by providing a transit option, with reduced potential for environmental impacts. As described in Section 4.5-2 of the Draft EIR, the High-Frequency Bus Alternative would result in a less-than-significant impact for all assessed topics.

Although not necessarily a "smaller scale" alternative, the LPA was identified as particularly effective in reducing certain impacts associated with the Elevated/At-Grade Alignment, specifically operational noise and construction vibration impacts. The LPA incorporates a trench design between 170th and 182nd Streets, which significantly reduces operational noise impacts to nearby sensitive receptors, resulting in a less-than-significant impact with mitigation. This alternative also eliminates the need to relocate the freight bridge at Grant Avenue, reducing the potential construction-related vibration impacts to nearby structures. Although the Elevated/At-Grade Alignment would have a less-than-significant impact regarding emergency access, the LPA eliminates this concern entirely, because it would not have any at-grade intersection crossings.

By evaluating these alternatives, the Draft EIR provides decision-makers and the public with a reasonable range of potentially feasible project alternatives that would avoid or substantially reduce one or more of the project's significant impacts while achieving most of the basic project objectives. Thus, the Draft EIR is consistent with CEQA, including CEQA Guidelines Section 15126.6.

22-143 See response to Comment 22-142.

22-144 The project objectives, as presented in Chapter 2, Project Description, of the Draft EIR, were crafted to allow a reasonable range of alternatives to be evaluated, consistent with CEQA Guidelines Section 15126.6. The objectives are intentionally framed without overly narrow parameters, for example, they do not specify a required project size or footprint, so that alternatives with different characteristics could still be evaluated for their potential to meet most of the project's basic objectives.

The Draft EIR does consider off-site locations. The High-Frequency Bus Alternative would operate within existing roadways and would not utilize the Metro ROW (see Draft EIR Section 4.4-2; Figure 4.4-1). The Hawthorne Option, evaluated throughout the Draft EIR, would leave the Metro ROW to run along Interstate 405 (I-405) between Inglewood Avenue and Hawthorne Boulevard, and follow Hawthorne Boulevard south between 162nd and

190th Street (see Draft EIR, Figure 2.3-24). However, off-site locations outside this corridor would not fulfill the primary project objective of providing high-capacity transit service in the South Bay. For information regarding alternatives that were considered but eliminated from further evaluation in the Draft EIR, see Chapter 4, Evaluation of Alternatives, of the Draft EIR, as well as the 2023 Alternatives Considered and Eliminated Report, which was published concurrently with the Draft EIR and made available on the project website.

22-145 The Draft EIR provides a detailed review of the relevant policies in the City of Lawndale's General Plan Circulation and Safety Elements that were in place at the time of the Draft EIR and comment letter's issuance. This analysis, which begins on page 3.1-9 of the Draft EIR, explains how the project is consistent with the approach to each community's adopted plans and summarizes the relevant transportation policies that the project may affect. For example, the Circulation Element Policy 4A is to "Reduce daily and peak hour vehicle trips," and Policy 5D is to "Work with regional transportation agencies to plan and implement a commuter rail system …" Given the Circulation Element was written in 1991, the precise language of "commuter rail system" is somewhat more specific than what has evolved since that time to become a regional rail network. However, the policies are clearly intended to facilitate greater use of public transportation. The project would also enhance transportation safety by including infrastructure improvements, including new pedestrian crossings with enhanced safety features, along the Metro ROW.

Although not directly relevant to the comment, it should be noted that in December 2023, after the close of the public comment period on the Draft EIR, the City of Lawndale adopted a General Plan Update, which replaces the General Plan that was in place when the comment was written. Metro has reviewed the General Plan Update and identified no inconsistencies. The updated Mobility Element includes policies to support the reduction of VMT and the provision of public transit, including Policy M-3.2, which directs the City to link activity centers, public facilities, and schools to transit and active transportation facilities; Policy M-5.3, which requires new developments to construct, when appropriate, transit facilities; and Policy M-5.4, which requires the City to work with Metro to ensure C (Green) Line service (including headways and service hours) are sufficient to meet the needs of transit commuters to and from Lawndale. Additionally, "Action Item" M-5b of the General Plan Update requires the City to work with Metro to increase transit service frequency, speed, and reliability and increase ridership to strengthen linkages and access to the C line rail stations. For additional information regarding the project's consistency with the Lawndale General Plan, see MR-10: Changes to Community Character.

22-146 The comment states that the Draft EIR should include a Traffic Operations Study. Traffic operations and associated metrics such as traffic delay and LOS are no longer allowable CEQA transportation impact criteria under State of California requirements. However, a separate 2023 Transportation Detail Report, published concurrently with the Draft EIR, and is available in the "Project Filing Cabinet" on Metro's website for the C Line Extension to Torrance. That report details the traffic operations effects of the alternatives and options. See MR-11: Traffic Delay and Level-of-Service.

22-147 While the City's 1991 General Plan Circulation Element and 2015 General Plan Safety Element include policies that refer to LOS, as of 2020, intersection LOS is no longer a considerable criterion under CEQA for the determination of environmental impacts. However, these conditions were evaluated in a separate report. The City of Lawndale's General Plan Update (adopted in December 2023) reflects these changes in state law

focusing on transportation planning and reducing VMT. For instance, Policy M-9.1 requires the City to use a VMT analysis for the purposes of environmental review under CEQA, though, for the purposes of planning and designing street improvements, the City shall continue to maintain LOS standards. See response to Comment 22-146 and MR-11: Traffic Delay and Level-of-Service.

22-148 See response to Comment 22-147.

22-149 The Draft EIR provides detailed information and analysis on the Elevated/At-Grade Alignment, Trench Option, and Hawthorne Option, including the traffic and transportation impacts associated with each option. The comment does not detail what information the City considers incomplete or missing. The Draft EIR was prepared in accordance with CEQA requirements for a thorough environmental impact analysis and includes sufficient information to facilitate meaningful public review and comment.

22-150 In accordance with CEQA, including AB 52, Metro proactively initiated consultation with tribal representatives identified by the Native American Heritage Commission (NAHC) to seek input on potential tribal cultural resources within the project area. On February 2, 2021, initiation letters were sent via both mail and email to the seven individuals identified by the NAHC. In order to ensure effective communication, Metro sent follow up emails on February 12, 2021, to confirm working email addresses, requesting written consultation responses. One response was received. Specifically, on March 5, 2021, Adrian Morales responded, via email, that the Gabrielino Tongva San Gabriel Band of Mission Indians would like to participate in the consultation process and stated that the tribe would contact Metro with formal recommendations. Following this, Metro engaged in ongoing efforts to maintain communication and request formal recommendations, with follow up emails sent on May 10, 2021, May 25, 2021, July 12, 2021, July 29, 2021, and October 27, 2021. These multiple contacts were made to ensure that the tribe had ample opportunity to participate in the consultation. A virtual consultation meeting took place on July 27, 2023, in which Adrian Morales and the Metro Team discussed concerns related to natural and cultural resources in/near the project area and provided feedback on project mitigation measures.

22-151 As discussed throughout the Draft EIR, the project would be designed in accordance with all applicable regulations and design criteria, including those of the CPUC (e.g., see pages 2-27, 3-6.10 to 3.6-11, 3.6-21 to 3.6-22, 3.6-47, 3.11-2 to 3.11-3, 3.15-2 to 3.15-3, 3.15-31 to 3.15-33, and 3.16-9 of the Draft EIR).

22-152 Section 3.11, Utilities and Service Systems, of the Draft EIR, includes details on utility relocations, including those required for the Hawthorne Option. Project Feature PF-US-1: Utility Identification and Coordination on page 3.11-10 of the Draft EIR ensures proper utility identification and coordination prior to construction activities. As per Metro standard practice, prior to the start of any demolition or construction activities, the construction contractor would verify the locations of existing utilities potentially affected by construction activities through thorough coordination with utility providers for all wet and dry utilities (e.g., water, sewer, gas, electric, and telecommunications). This coordination would include obtaining documentation of existing utility locations and conducting field verification methods, such as potholing and geotechnical investigations. Based on these investigations, the contractor would coordinate with the respective utility providers to determine the necessary setbacks, protections, or relocations for each utility line, including stabilization measures for high-voltage power lines near the freeway in the Hawthorne Option. This process would ensure that all utility relocations or protections are fully assessed and

implemented, preventing impacts on essential services and infrastructure. See also MR-7: Utility Relocation and Hazardous Materials Safety.

22-153 The City of Lawndale's feedback and concerns are noted and would be considered by the Metro Board prior to it taking action on the Final EIR and the project. The Draft and Final EIR have been prepared in compliance with CEQA. The Final EIR addresses all comments submitted during the Draft EIR comment period and includes revisions and corrections, where appropriate, to amplify or clarify the information presented in the Draft EIR. Metro would continue coordination with the City of Lawndale and all other local jurisdictions.

Submission 60 Immanuel Chiang, Los Angeles County Sheriff's Department

60-1 As described in Section 3.1, Transportation, of the Draft EIR, Project Feature PF-T-1: Construction Traffic Management Plan requires contractors to develop a Construction Traffic Management Plan (CTMP) with Metro, which would be submitted to all jurisdictions for review, including the Sheriff's department and other first responder agencies.

Submission 82 Elaine Lee, Caltrans District 7 Division of Environmental Planning

82-1 Metro acknowledges Caltrans' authority and jurisdiction over the listed facilities and would complete encroachment permits as required. The Hybrid Alternative was selected as the LPA; see MR-1: Selection of Alternatives.

82-2 As shown in Section 4.3, Corrections and Additions, of the Final EIR, Table 2.6-1 of the Draft EIR was revised to include discretionary actions for local jurisdictions.

82-3 The use of the term "Bicycle Facilities" is intended to be consistent with the use of "Pedestrian Facilities" within Section 3.1, Transportation, of the Draft EIR. On page 3.2-32 of the Draft EIR, the first sentence explains what is intended to be included in the discussion of "bicycle facilities" and does not denote racks, storage, showers, etc. No revisions were made in the Final EIR in response to this comment.

82-4 According to the California Vehicle Code (CVC) Div 11 Article 4, people riding bicycles have, "all the rights and [are] subject to all the provisions applicable to the driver of a vehicle by this division." Therefore, unless otherwise expressly prohibited by posted signage, bicyclists are permitted to operate on major roadways including Hawthorne Boulevard. Riding bicycles on sidewalks is addressed in the CVC Part 21206: "This chapter does not prevent local authorities, by ordinance, from regulating the… operation of bicycles on pedestrian or bicycle facilities," meaning local jurisdictions have the authority to permit or deny bicyclists from riding on sidewalks. The City of Lawndale prohibits sidewalk riding. The City of Redondo Beach prohibits sidewalk riding where signs are posted. The City of Torrance prohibits sidewalk riding within business districts or adjacent to destinations such as churches and schools.

82-5 Page 3.2-32 of the Draft EIR already defines "bike lane" as Class II and "bike route" as Class III. No revisions were made in the Final EIR in response to this comment.

82-6 It is presumed the commentor refers to the California Department of Transportation Director's Policy DP-37 dated December 7, 2021 regarding Complete Streets, which states, "all transportation projects funded or overseen by Caltrans will provide comfortable, convenient, and connected complete streets facilities for people walking, biking, and taking transit or passenger rail unless an exception is documented and approved." The directive is

intended for projects "funded or overseen by Caltrans," which this project is not. However, the project would not preclude Caltrans from carrying out the Complete Streets Directive for projects it funds or oversees, including those on Hawthorne Boulevard. The project includes Complete Streets-supportive elements, such as the implementation of new signalized pedestrian crossings that reduce the interval between safe crossings on Hawthorne Boulevard between residential and retail land uses. No revisions were made in the Final EIR in response to this comment.

82-7 Section 3.1-4.1 of the Draft EIR has been revised as requested in Section 4.5, Corrections and Additions, of the Final EIR. The rephrasing does not change the meaning or conclusions of the Draft EIR.

82-8 See response to Comment 82-6.

82-9 Section 3.1-4.1 of the Draft EIR has been revised as requested in Section 4.5, Corrections and Additions of the Final EIR. The rephrasing does not change the meaning or conclusions of the Draft EIR.

82-10 Section 3.1-4.1 of the Draft EIR has been revised as requested in Section 4.5, Corrections and Additions, of the Final EIR. The rephrasing does not change the meaning or conclusions of the Draft EIR.

82-11 The reference has been revised in Section 4.5, Corrections and Additions, of the Final EIR, to read "discussed in Appendix 3.2-A, Transportation Policy Analysis." The revision does not change the meaning or conclusions of the Draft EIR.

82-12 There are approximately eight pairs of bus stops located along Hawthorne Boulevard within the area to be directly affected by construction. Because construction would be phased to minimize disruption to Hawthorne Boulevard, not all bus stops would be temporarily closed or relocated simultaneously, but there is the possibility that more than one bus stop on the same side of the road, or on opposite sides in the same segment, could be closed or relocated during the same period. It is probable that each of these bus stops would need at least some period of closure or relocation during construction.

82-13 The first sentence of Section 3.2-4.3.2 of the Draft EIR states, "Proposed Project construction would introduce partial and full street closures." Appendix 2-A, Select Advanced Conceptual Engineering Drawings of the Draft EIR, pages 180 to 211, show the Hawthorne Option traffic handling and staging plans. As described in Appendix 2-A, Select Advanced Conceptual Engineering Drawings, of the Draft EIR construction is anticipated to be staged in three phases to first modify Hawthorne Boulevard lanes, construct the light rail guideway, and then complete median work. Construction would be phased to minimize full closures and maintain access to all driveways during business hours. However, these staging plans were developed to support a conceptual level of design, and the precise nature and phasing of construction is not known or required to be determined during preparation of the EIR.

Preceding the initiation of localized construction activities for the project, Metro and its contractors would coordinate with relevant authorities, including Caltrans, following standard practices and procedures, to secure permits for construction and coordinate plans for when and how many lanes would be closed.

82-14 All proposed alignments would require some non-residential permanent parcel acquisitions. Appendix 2-A, Select Advanced Conceptual Engineering Drawings, of the Draft EIR includes

ROW sheets that depict the parcels that would be permanently or temporarily acquired. Section 3.2-4.1.1 of the Draft EIR states that the parcel acquisitions are additional compared to the Elevated/At-Grade Alignment and Trench Option. Additional text has been added in Section 4.6, Corrections and Additions, of the Final EIR to clarify that these acquisitions would not result in land use impacts.

82-15 See response to comment 82-14. Metro published several non-CEQA reports alongside the Draft EIR. These reports present information that is not required under CEQA, but supports the project's decision-making process. Therefore, the Draft EIR does not mention the non-CEQA reports.

82-16 See response to Comment 82-13.

82-17 See response to comment 82-13. Temporary closures for construction would not fully preclude access to adjacent land use, although the exact nature of the disruption and temporary accommodations to maintain access cannot be known during the EIR phase. In similar past projects, Metro and its contractors have coordinated with local businesses and residents as well as relevant jurisdictions to manage access and the effects of temporary closures and identify reasonable accommodations or alternatives, which could include limiting construction hours, providing alternate routes or temporary easements, or other strategies. These are identified as part of the preliminary engineering work, and updated as necessary prior to the initiation of localized construction activities, in the development and implementation of the CTMP, which is described as Project Feature PF-T-1: Construction Traffic Management Plan in the Draft EIR.

82-18 As discussed in Section 3.2, Land Use and Planning, of the Draft EIR, the Hawthorne Option would not physically divide the community as the light rail is grade-separated from the street allowing for vehicles, pedestrians, and cyclists to access the surrounding neighborhood; it would not eliminate access or alter the street grid. In terms of visual impacts, as discussed in Section 3.3, Aesthetics, the elevated guideway would run parallel to the Interstate-405 Freeway, and it would generally have a similar scale and massing to surrounding structures. In addition, the components of the Hawthorne Option would be designed to comply with applicable design standards and would incorporate architectural treatments and landscaping to provide a unified design. Furthermore, it would not block long range views of any prominent visual features.

82-19 The analysis on Page 3.2-25 of the Draft EIR states that the project would "comply with all applicable regulations and local ordinances governing construction activities." No revisions were made in the Final EIR in response to this comment.

82-20 The table heading in Table 3.2-5 of the Draft EIR has been revised as suggested in Section 4.6, Corrections and Additions, of the Final EIR. The revision is editorial in nature and does not change the meaning or conclusions of the Draft EIR. A separate appendix was not created, as Table 3.2-5 summarizes the land use plan/policy consistency analysis, appropriately supporting the impact analysis contained in Section 3.2, Land Use and Planning, of the Draft EIR.

82-21 Table 3.2-5 of the Draft EIR has been revised to state that there would not be conflicts with land use patterns, within Section 4.6, Corrections and Additions, of the Final EIR. The project would require limited permanent property acquisitions, but they would not conflict with other uses in the surrounding area or create land use incompatibilities.

82-22 Project Feature PF-AES-2: Metro Design Standards specifically describes Metro design standards and therefore was not revised. If implementation of any project element involves the removal of trees within Caltrans' jurisdiction, such as the removal of trees along Hawthorne Boulevard under the Hawthorne Option, Metro would coordinate with Caltrans' Office of Stormwater and Landscape Architecture, as appropriate, to ensure compliance with applicable requirements.

82-23 Metro acknowledges that the median within Hawthorne Option also serves as a pedestrian refuge. No revisions were made in the Final EIR in response to this comment.

82-24 The exact time frames for the types of construction that have the potential to affect visual character are not precise enough to compare. However, the Draft EIR does acknowledge the differences in impact as it relates to construction duration and phase where measurable.

82-25 During construction, all alignment options would involve similar types of construction equipment, vehicles, signs, staging, and personnel presence. However, as noted in the Draft EIR (e.g., page 3.3-90), the Hawthorne Option would introduce a larger permanent visual change due to the elevated guideway in a highly visible corridor, and would therefore result in a higher degree of visual change.

82-26 As discussed in Section 3.3-4.3 of the Draft EIR, because the project is in an urbanized area, the visual impact analysis considers whether the project would conflict with applicable zoning and other regulations governing scenic quality. To ensure a full assessment of this threshold, the Draft EIR follows the Federal Highway Administration (FHWA) methodology for visual impacts assessments, which evaluates changes in visual character and quality, including effects on viewers such as motorists. As part of this analysis, the Draft EIR considers changes associated with the elevated structure, including its scale, form, and relationship to adjacent land uses. The Hawthorne Option would not create a "tunnel-like" feeling for motorists, as the elevated structure would be located within the median, and motorists would primarily be driving parallel to the guideway, rather than underneath it, except when making a left turn or crossing through an intersection. The structure would span intersections and would not fully enclose the roadway. As a result, the Hawthorne Option would not create the physical characteristics of a tunnel, or result in a substantial depredation of existing visual quality.

82-27 As requested, text referencing Appendix 2-A, Select Advanced Conceptual Engineering Drawings, of the Draft EIR where the plans, profiles, and cross-sections for the alignments are included, has been added to Section 3.3-4.3.2 in Section 4.7, Corrections and Additions, of the Final EIR. The height and width of the elevated structure would vary along the alignment, but the elevated guideway would generally be about 30 feet high, and the OCS on top would be about 15 feet tall.

Metro would follow all applicable safety laws, and structures would not block roadway signage or safety-related signage. The KOP simulations illustrate the general visual changes that would be expected to occur, and the exact location of columns and any required relocated signage would be refined during final design, with coordination with all applicable jurisdictional agencies to ensure that street signs, safety signage, and plaza signage remain visible and compliant with applicable standards.

Metro would coordinate with Caltrans as needed for the removal and replacement of any trees on Caltrans facilities required by the project in accordance with applicable requirements from the Office of Stormwater and Landscape Architecture.

Section 3.3-4.4 of the Draft EIR addresses the potential for the project to create new shade or shadows that would substantially affect outdoor recreation facilities or other public areas. Although the CEQA Guidelines do not establish criteria for evaluating shade and shadow impacts, the Draft EIR assesses shadow impacts on shadow-sensitive uses, such as outdoor recreational areas and public spaces where prolonged outdoor activities occur. These are areas where shade could diminish the usability or function of the public space in a way that rises to the level of a physical environmental effect under CEQA. In contrast, sidewalks, streets, and building facades, including those on commercial corridors such as Hawthorne Boulevard, are not considered shadow-sensitive uses. This approach reflects the reality that such areas are already subject to intermittent shading from trees, awnings, buildings, and other urban structures, and their basic public purposes (circulation, access, commercial activity) are not meaningfully altered by transient or partial shading. Indeed, in many instances, temporary shade and shadowing in these areas is a welcome temporary reprieve. Additionally, the shade and shadow pattern created by the elevated structures would be intermittent, diffuse, and would shift throughout the day, and not likely interfere with the intended use of the space in a manner that would constitute a significant environmental impact. Accordingly, the Draft EIR did not identify shadow impacts along Hawthorne Boulevard as significant under CEQA, and no additional mitigation or detailed shadow modeling is warranted.

82-28 The Los Angeles County portion of the South Coast Air Basin has been designated as attainment/maintenance for the National Ambient Air Quality Standards (NAAQS) for carbon monoxide (CO) since 2007. No CO air quality violations have been recorded in this area for over 15 years. Furthermore, Metro acknowledges that the California Department of Transportation often requires CO hot-spot intersection or parking lot analyses for projects seeking funding from the Federal Highway Administration. These analyses are prepared following the Transportation Project-Level Carbon Monoxide Protocol (CO Protocol) (Caltrans, 2010). Sections 3 and 4 of the CO Protocol describe the methodology for determining whether a detailed CO hot-spot analysis is needed for a project if the project is suspected of resulting in higher CO concentrations than those existing within the region at the time of attainment demonstration. Using this methodology, a detailed CO hot-spot analysis is not needed for the project's Torrance TC because:

- The background concentrations of CO in the project area are considerably lower than the CO concentrations used in the attainment demonstration for the intersection of Wilshire Boulevard and Veteran Avenue. As shown in Table 3.4-13 on Page 3.4-27 of the Draft EIR, the maximum background 1- and 8-hour CO concentrations in the project area were 1.8 and 1.5 ppm between 2018 and 2020. These concentrations are lower than the background concentrations used for the attainment demonstration which were predicted to be 10.8 ppm for the 1-hour measurements and 9.9 ppm for the 8-hour measurements for the year 2002, as shown in Table 4-4 from the 2003 Air Quality Management Plan (AQMP) Attainment Demonstration.
- The Torrance Transit Center parking lot would have much lower traffic volumes when compared to the intersection of Wilshire Boulevard and Veteran Avenue. In the modeling and attainment demonstration, the peak hour traffic volume at Wilshire Boulevard and Veteran Avenue was 10,601 vehicles. The Torrance TC parking lot volumes would not exceed 10,000 vehicles per hour.

- The attainment demonstration evaluated the CO concentrations at a distance of 3 meters (10 feet) from the edge of the roadways. Since the CO Protocol does not permit the modeling of receptor locations closer than 3 meters (10 feet), receptor locations modeled for the project would be the same or farther than the receptors evaluated for the attainment demonstration.
- The worst-case meteorology used to assess the project would be identical to the meteorology used for the Wilshire Boulevard and Veteran Avenue intersection in the attainment demonstration. The CAL3QHC model was used for the attainment demonstration. If the project were modeled, both intersections would be evaluated using the same meteorology settings in CAL3QHC, as the model only has one meteorological data set.
- The number of vehicles operating in cold start mode was not available in the attainment demonstration. However, the percentage of vehicles operating during the peak hour in cold start mode for the project would be expected to be the same or lower than the Wilshire Boulevard and Veteran Avenue intersection.

Localized operational air quality impacts at parking lots are not typically evaluated in contemporary CEQA analyses because the aggregate average CO and PM mobile source emission rates have decreased so substantially since the original guidance was published that there is essentially no possibility of significant adverse concentrations resulting from a single project's effects on vehicle queuing. As described above, there is no potential for the project to result in a mobile source hot-spot at the Torrance Transit Center parking lot. Therefore, no further analysis is required.

82-29 See response to 82-28.

82-30 As requested, Section 2.5, Project Description, Appendix 2-C, Project Features, and Section 3.7-2.3 of the Draft EIR have been revised in Section 4.11 and Section 4.24, Corrections and Additions, of the Final EIR to include the Metro Tree Policy as a project feature for the protection of biological resources.

82-31 Metro would coordinate with Caltrans as needed on the removal and replacement of any trees on Caltrans facilities required by the project.

82-32 In response to this comment, Mitigation Measure MM-BIO-2: Nesting Bird Season Restrictions and Pre-Construction Surveys has been revised as requested in Chapter 4, Corrections and Additions, of the Final EIR, from 95 hours (4 days) to 72 hours (3 days).

82-33 The term "utilize" in Project Feature PF-HMM-3: Property Acquisition Phase II Site Investigation in Section 3.9, Hazards and Hazardous Materials, of the Draft EIR encompasses areas where the project would disturb soil. Phase II Site Investigations would not be required in the resource study area (RSA) if the site would not be disturbed by the project. No revision is required. Metro would complete the required Phase II site investigations as part of the next phase of design.

82-34 As requested, in Chapter 4, Corrections and Additions, of the Final EIR, Project Feature PF-HHM-2 has been revised to include demolition of roadways. In addition, Section 3.9-4.1.1 of the Draft EIR has been revised to include an analysis of construction impacts related to hazardous wastes that may be encountered during roadway demolition, including lead based paint (LBP) and other heavy metals. These revisions do not change the conclusions of the Draft EIR, as hazardous wastes encountered during roadway demolition would be

handled in the same manner as for the rest of the project. Project Feature PF-HHM-2 would be part of the project, which requires demolition plans that detail the procedures for the handling and disposal of hazardous wastes in accordance with federal and state regulations. Therefore, the impact would remain less than significant.

82-35 The depth of elevated structure piles could range between 90 to 150 feet, depending on existing geotechnical and groundwater conditions. The exact depths of any structural piles required for the project would be determined during preliminary design, when geotechnical investigations would be completed.

82-36 See response to comment 82-13.

82-37 The I-405 ramp interchanges at Inglewood Boulevard and Hawthorne Boulevard are beyond the footprint of the Hawthorne Option. However, Metro notes this comment as an opportunity to coordinate future first/last mile planning with Caltrans priorities for active transportation.

Submissions 84 Sean Moore, City of Lawndale

84-1 Submission 84 includes the same comments from the City of Lawndale as Submission 22. See the responses to comments to Submission 22.

Submission 94 Rochelle Campomanes, Los Angeles County Sheriff's Department

94-1 Section 4.19, Corrections and Additions, of the Final EIR, includes corrections to state that the Redondo Beach Transit Center was completed without a dedicated police substation but rather an office space to be used by the Redondo Beach Police Department on an as-needed basis. Metro is aware that, since the Draft EIR's publication, the City of Torrance has proposed plans to construct a new parking structure adjacent to the Torrance TC with dedicated space for a Torrance Police Department substation. This project has been added to the cumulative projects list in Section 3.0, Introduction, included within Section 4.4, Corrections and Additions, of the Final EIR. These changes do not result in changes in the cumulative analysis presented in the Draft EIR, as construction of the Torrance project is anticipated to be completed prior to this project.

94-2 As described in Section 3.15, Public Services, and Section 3.16, Other CEQA Considerations, of the Draft EIR, the project would not result in unplanned population growth beyond any regional growth projections. Because the project would not introduce new residential development or significant unplanned growth, it is not anticipated to generate a substantial increase in demand for permanent public services, such as law enforcement, that would necessitate construction of new or expanded governmental facilities.

Metro works closely with local law enforcement, including the Los Angeles County Sheriff's Department (LASD), to ensure that safety and security resources are appropriately allocated.

See MR-9: Light Rail Security and MR-15: Metro Ridership Forecasting Methodology.

94-3 The analysis in Section 3.15, Public Services, of the Draft EIR has been revised within Section 4.19, Corrections and Additions, of the Final EIR, to state that LASD does not provide public safety services to the City of Inglewood.

94-4 The analysis in Section 3.15, Public Services, of the Draft EIR has been revised within Section 4.19, Corrections and Additions, of the Final EIR, to include the LASD response times provided in the comment. This information does not change the conclusion provided on pages 3.15-31 of Chapter 3.15, Public Services, of the Draft EIR, of less than significant for police services.

94-5 As described in Section 3.1, Transportation, of the Draft EIR, Project Feature PF-T-1: Construction Traffic Management Plan (CTMP) requires contractors to develop a CTMP with Metro, which would be submitted to all jurisdictions for review, including LASD.

Submission 121 Mandy Huffman, Los Angeles County Sanitation Districts

121-1 The Los Angeles County Sanitation Districts' (Districts) statement regarding the Districts' policy on groundwater discharges into its sewerage system is noted. The statement on page 3.9-12 of the Draft EIR that "The County of Los Angeles Department of Public Works would be contacted prior to discharging groundwater into their sewer or stormwater systems" reflects a general description of one procedural element in Project Feature PF-HHM-5: Disposal of Groundwater regarding discharge activities. Metro recognizes that stormwater is generally directed to storm drains, not the sewerage system. As set forth by Project Feature PF-HHM-5, Metro would consult with applicable agencies, including the Districts, regarding groundwater discharge and disposal, as requirements for such activities vary by agency, location, concentration, and contaminants.

121-2 The Districts' statement regarding its policy restricting stormwater discharge into the sewerage system is acknowledged. The statement on page 3.11-13 of the Draft EIR that "both stormwater runoff and sewage are collected and transported through underground municipal sewage systems" reflects a general description of wastewater and stormwater systems. However, Metro recognizes that stormwater is generally directed to storm drains, not the sewerage system. Clarifying language has been added to Section 4.11-3.2 of the Final EIR, stating that stormwater discharge is not typically received in the Districts' sewage system. As discussed on page 3.11-21 of the Draft EIR, the project may require the relocation of existing stormwater drainage infrastructure. As described in Section 3.10, Hydrology and Water Quality, of the Draft EIR, the project includes several project features to ensure effects on the stormwater system remain insignificant. These include Project Feature PF-HWQ-1: SWPPP Implementation per Construction General Permit and MS4 Permit, which would help reduce stormwater runoff velocity, and Project Feature PF-HWQ-4: Trench Construction Runoff Collection and Treatment, and Project Feature PF-HWQ-5: Temporary Storm Drain Inflow Rerouting, which would prevent exceedances of existing storm drain capacity in connection with trench construction. Further, Metro would comply with all permit requirements, including obtaining an Industrial Wastewater Discharge Permit. For more information regarding project features and stormwater management, see Section 3.10, Hydrology and Water Quality, and Section 3.11, Utilities and Service Systems, of the Draft EIR.

121-3 Metro has coordinated with the Districts' during the environmental review process and would continue to do so throughout future phases of design and prior to construction. As project plans advance and incorporate more detailed information regarding the Districts' facilities, Metro would submit plans and specifications to the Districts for review and comment. See MR-7: Utility Relocation and Hazardous Materials Safety.

121-4 The sewer line and other utilities that are longitudinally along the alignments are shown in the cross-sections in Appendix 2-A, Select Advanced Conceptual Engineering Drawings, of the Draft EIR, along with the dimensions of the utilities and owner. The 8-inch sewer line under the Districts' jurisdiction that is identified for relocation as part of the Hawthorne Option is located near the intersection of 160th Street and Grevillea Avenue. Metro has coordinated with all utility owners in preparation of the EIR, and would continue to do so throughout future phases of design and prior to construction.

121-5 The Draft EIR correctly states that the RSA, which encompasses the cities of Lawndale, Redondo Beach, and Torrance, is serviced in some capacity by the Joint Water Pollution Control Plant (JWPCP). The Draft EIR uses the same provided link as the source for the JWPCP service area, which is listed in Chapter 5, References, on page 5-21 of the Draft EIR. However, the reference title is incorrect and listed as "Los Angeles County Sewer Districts (LACSD)", which has been corrected in Section 4.15, Corrections and Additions, of the Final EIR. This correction does not change the meaning or conclusions of the Draft EIR.

121-6 See response to Comment 121-5. The reference to "Los Angeles County Sewer Districts" has been corrected to "Los Angeles County Sanitation Districts" in Chapter 4, Corrections and Additions, of the Final EIR.

121-7 See response to Comment 121-3.

Submission 123 Ruby Kwan-Davis, California Department of Fish and Wildlife

123-1 Metro acknowledges the California Department of Fish and Wildlife's (CDFW) authority and jurisdiction over the items listed in this comment. As explained in Section 3.7, Biological Resources, of the Draft EIR, the project is not anticipated to impact CDFW jurisdictional areas related to rivers, streams, or lakes because the project footprint does not cross or otherwise encroach on any sensitive habitat types. Moreover, there are no state or federally endangered or threatened species identified with potential to occur that could be impacted by construction or operation activities.

123-2 The agency accurately summarizes the project described in the Draft EIR.

123-3 Coordination between CDFW and the City of Torrance is noted. In August 2025, Metro staff and consultants met with CDFW and City of Torrance staff to discuss the project's proposed mitigation for southern tarplant (*Centromadia parryi ssp. australis*) set forth in Section 4.11, Corrections and Additions, of this Final EIR, and discussed in response to Comment 123-4 below.

123-4 Appendix 2-A, Select Advanced Conceptual Engineering Drawings, of the Draft EIR correctly depicts the project's footprint extending into the City of Torrance's approximately two-acre Southern Tarplant Open Space Preserve adjacent to the Torrance Transit Center. However, the Draft EIR inadvertently omitted this encroachment, which is approximately 7,471 square feet, from the impact discussion in Section 3.7-4 of the Draft EIR. Since the publication of the Draft EIR, Metro has confirmed that maintenance and emergency access would require both temporary and permanent disturbance within the Preserve. During project design development, Metro evaluated options to avoid the Preserve entirely, including whether maintenance could be done from on top of the tracks, but full avoidance was determined to be infeasible because the Preserve occupies the only practicable location for the required maintenance and emergency access path serving the Torrance Transit Center Station.

Section 3.7-4 of the Draft EIR has been revised in Section 4.11, Corrections and Additions, of this Final EIR to address potential impacts related to this encroachment during both construction and operation. The revised analysis concludes that the project would directly and indirectly affect southern tarplant within the Preserve by potentially reducing the number of individual plants and decreasing contributions to the seed bank, thereby weakening the long-term resilience of the on-site population. Although the regional viability of southern tarplant is not expected to be affected—because the Preserve's population is ecologically and geographically isolated from other known occurrences—the analysis acknowledges that the project would diminish the on-site viability of the species and affect an area originally established as mitigation for the 2014 Torrance Transit Center Project.

To avoid and minimize effects during construction and operation, the project would implement Mitigation Measures MM-BIO-1: General Protection Measures to Avoid and Minimize Impacts on Sensitive Biological Resources and MM-BIO-4: Pre-Construction Rare Plant Survey. These measures require delineation of work limits and buffers, preconstruction rare plant surveys to document then-existing conditions, and on-site monitoring by a qualified biologist. Mitigation Measure MM-BIO-1: General Protection Measures to Avoid and Minimize Impacts on Sensitive Biological Resources would also apply to ongoing operational maintenance.

In addition, new Mitigation Measure MM-BIO-5: Off-Site Mitigation for Southern Tarplant Habitat, has been added in Section 4.11, Corrections and Additions, of this Final EIR, to address the project's direct and permanent loss of habitat within the Preserve. MM-BIO-5: Off-Site Mitigation for Southern Tarplant Habitat requires Metro to offset impacts at a 3:1 ratio through establishment, preservation, and perpetual management of suitable habitat. The measure establishes a mitigation hierarchy. Metro understands that the City of Torrance is currently evaluating relocation and re-establishment of the entire Southern Tarplant Open Space Preserve at the Elm Water Yard within the City. If the City elects to proceed with that relocation, Metro may satisfy its mitigation obligation by entering into an agreement with the City to fund and implement a proportional share of the new preserve. Such an agreement must include provisions for long-term management funding and performance standards at least equivalent to those described in MM-BIO-5: Off-Site Mitigation for Southern Tarplant Habitat. If the City does not proceed with relocation, Metro would be required to implement a stand-alone off-site mitigation project that secures appropriate land rights, provides habitat enhancement, establishes monitoring, and funds perpetual management.

If no suitable site can be identified within the City of Torrance, Mitigation Measure MM-BIO-5: Off-Site Mitigation for Southern Tarplant Habitat requires Metro to evaluate off-site locations outside the City where southern tarplant is known to occur or where appropriate habitat exists. For example, southern tarplant has been documented within the Ramona Grasslands Open Space Preserve in San Deigo County (CBI, 2004) and on nearby privately held parcels, and the species is also present in other coastal counties from Santa Barbara to San Diego that provide similar soils and hydrological conditions. These examples demonstrate that feasible off-site mitigation opportunities exist should relocation within Torrance prove infeasible. Finally, if no appropriate site can be identified after a reasonable and documented effort, Metro must consult with CDFW to identify an alternative mitigation strategy that achieves equivalent biological value and long-term viability, which may include payment of an in-lieu fee to a CDFW-approved land management entity.

Pursuant to Mitigation Measure MM-BIO-5: Off-Site Mitigation for Southern Tarplant Habitat, Metro would also prepare a Southern Tarplant Translocation/Enhancement Plan in consultation with CDFW. The plan would include methods for seed collection over a minimum of two years, best management practices for planting and invasive species control, monitoring protocols, and an implementation schedule.

As described in Section 4.11, Corrections and Additions, of this Final EIR, with implementation of these mitigation measures, construction and operational impacts to southern tarplant and the Southern Tarplant Open Space Preserve would be less than significant.

123-5 See response to Comment 123-4

123-6 See response to Comment 123-4.

123-7 See response to Comment 123-4.

123-8 See response to Comments 123-4.

123-9 See response to Comments 123-4. As noted in the comment, southern tarplant is a CRPR 1B.1 species. It therefore qualifies as a rare plant under CEQA Guidelines Section 15380. Metro recognizes this status and has applied the appropriate CEQA standard in identifying and mitigating impacts.

123-10 See response to Comment 123-4.

123-11 See response to Comment 123-4. CDFW recommends a series of mitigation measures to address the Project's impacts on southern tarplant within the Southern Tarplant Open Space Preserve. Metro agrees with the intent of these recommendations, and the Final EIR includes mitigation measures that collectively meet or exceed them. As discussed in Response to Comment 123-4, Mitigation Measures MM-BIO-1: General Protection Measures to Avoid and Minimize Impacts on Sensitive Biological Resources, MM-BIO-4: Pre-construction Rare Plant Survey, and MM-BIO-5: Off-Site Mitigation for Southern Tarplant Habitat require delineation of work areas, pre-construction surveys, on-site monitoring, compensatory mitigation at a minimum 3:1 ratio, preservation and management of habitat in perpetuity, preparation of a Southern Tarplant Translocation/Enhancement Plan in consultation with CDFW, and establishment of an endowment or equivalent funding mechanism for long-term management. These requirements are consistent with CDFW's recommendations for compensatory mitigation, CDFW review of mitigation sites, perpetual habitat protection, long-term management funding, and detailed protocols for seed collection, translocation, and monitoring. The individual responses below explain more specifically how CDFW's recommendations have been addressed.

123-12 See response to Comment 123-4.

New Mitigation Measure MM-BIO-5: Off-Site Mitigation for Southern Tarplant Habitat requires Metro to offset permanent impacts to southern tarplant at a minimum ratio of 3:1, or a higher ratio if required by CDFW. Mitigation Measure MM-BIO-5: Off-Site Mitigation for Southern Tarplant Habitat specifies that mitigation must be achieved through establishment, preservation, and perpetual management of suitable habitat, supported by a site-specific biological assessment to confirm that soil, hydrology, and ecological conditions are capable of supporting a self-sustaining population. Consistent with CDFW's recommendation, MM-BIO-5: Off-Site Mitigation for Southern Tarplant Habitat also requires

Metro to identify and evaluate potential mitigation sites within the City of Torrance and recognizes that the City is evaluating relocation of the Preserve to the Elm Water Yard as a primary mitigation option. If relocation within Torrance is not feasible, Mitigation Measure MM-BIO-5: Off-Site Mitigation for Southern Tarplant Habitat requires Metro to identify other suitable sites, including existing preserves known to support southern tarplant populations, or to consult with CDFW to establish an alternative strategy that achieves equivalent biological value and long-term viability.

Accordingly, Mitigation Measure MM-BIO-5: Off-Site Mitigation for Southern Tarplant Habitat requires compensatory mitigation in perpetuity at or above the level CDFW recommends and provides for preservation or establishment of suitable habitat in Torrance where feasible, or at another location capable of supporting a viable population.

123-13 See response to Comment 123-4. New Mitigation Measure MM-BIO-5: Off-Site Mitigation for Southern Tarplant Habitat requires Metro to coordinate with CDFW in identifying and evaluating potential mitigation sites. Mitigation Measure MM-BIO-5: Off-Site Mitigation for Southern Tarplant Habitat further requires that a site-specific biological assessment confirm the suitability of any proposed mitigation land for long-term southern tarplant populations before acquisition.

123-14 See response to Comment 123-4. New Mitigation Measure MM-BIO-5: Off-Site Mitigation for Southern Tarplant Habitat requires that off-site mitigation lands be permanently protected and managed in perpetuity through mechanisms such as conservation easements or other legally enforceable land protection instruments, together with an endowment or equivalent funding for long-term management. Consistent with CDFW's recommendation, these protections must be secured prior to any ground-disturbing activities that would affect the Southern Tarplant Open Space Preserve.

123-15 See response to Comment 123-4. New Mitigation Measure MM-BIO-5: Off-Site Mitigation for Southern Tarplant Habitat requires Metro to provide an endowment or other long-term funding mechanism to ensure perpetual management of replacement habitat. The measure also requires preparation of a Southern Tarplant Translocation/Enhancement Plan in consultation with CDFW that will include monitoring and management protocols. Together, these provisions address CDFW's recommendations for ongoing botanical surveys, non-native species control, reporting, and protections against future land use changes and other indirect impacts.

123-16 See response to Comment 123-4. New Mitigation Measure MM-BIO-5: Off-Site Mitigation for Southern Tarplant Habitat requires Metro to retain a qualified biologist to prepare a Southern Tarplant Translocation/Enhancement Plan in consultation with CDFW. MM-BIO-5 specifies that the plan must include seed collection for a minimum of two years, planting and invasive species control methods, monitoring protocols, and an implementation schedule. The measure must be complied with prior to ground-disturbance activities that could affect the Preserve.

123-17 On a yearly basis (once a year) during project construction, Metro would submit to the California Natural Diversity Database (CNDDB) information on special status species from its surveys for the project and submit information on special status native plant populations and sensitive natural communities to CDFW's Vegetation Classification and Mapping Program as required by the California Public Resources Code.

123-18 See responses to Comments 123-4 and 123-12 through 123-16. Mitigation Measures MM-BIO-1: General Protection Measures to Avoid and Minimize Impacts on Sensitive Biological Resources through MM-BIO-5: Off-Site Mitigation for Southern Tarplant Habitat are specific, detailed, and enforceable, consistent with CEQA Guidelines sections 15126.4(a)(2) and 15097 and Public Resources Code section 21081.6. As explained in responses to Comments 123-4 and 123-12 through 123-16, the Final EIR includes Mitigation Measures MM-BIO-1: General Protection Measures to Avoid and Minimize Impacts on Sensitive Biological Resources, MM-BIO-4: Pre-construction Rare Plant Survey, and MM-BIO-5: Off-Site Mitigation for Southern Tarplant Habitat, which collectively meet or exceed the recommendations set forth in CDFW's letter, including Exhibit A of the letter. These measures identify responsible parties, timing, performance standards, and, where appropriate, long-term funding mechanisms, and they will be incorporated into the Mitigation Monitoring and Reporting Program prepared for the Project pursuant to Public Resources Code section 21081.6.

123-19 As required by Public Resources Code section 21089, Fish and Game Code section 711.4, and California Code of Regulations, title 14, section 753.5, payment of the applicable CDFW filing fee would be made upon filing of the Notice of Determination.

123-20 See responses to Comments 123-4 and 123-11 through 123-16.

Submission 126 David Leger, South Bay Cities Council of Governments

126-1 In January 2023, Metro published several reports alongside the Draft EIR, which provided information on ridership, cost, real estate, urban design, transportation, and alternatives considered and eliminated. These reports were made available on the project's website via the link to "Project Filing Cabinet." These were all considered alongside the Draft EIR when the Metro Board made an LPA selection and, along with the Final EIR and all public comments, will inform the Metro Board's final decision-making process for the project. See MR-1: Selection of Alternatives.

126-2 Section ES-3, Executive Summary, of the Draft EIR summarizes the environmental topics that were determined to have no impact, a less-than-significant impact, or a less-than-significant impact with mitigation.

126-3 Project objectives can be found in Chapter 2, Project Description, of the Draft EIR. Metro published several non-CEQA reports alongside the Draft EIR in January 2023, including information on cost and ridership. Additional information can be found on the project website at metro.net/clineext. The Metro Board selected the LPA in May 2024. The Metro Board is expected to consider certification of the Final EIR and potential project approval in 2025, taking into consideration all public comments and feedback received throughout the environmental review process.

126-4 The Redondo Beach and Torrance TCs both provide existing parking spaces that could be used for transit customers. Page 2-20 of Chapter 2, Project Description, of the Draft EIR, states that the project includes a parking lot with an additional 180 spaces at the Torrance Transit Center, which would serve as the terminus station for the light rail line. However, Metro is not proposing to construct or own this parking directly. Instead, parking would likely be provided through a lease agreement with the City of Torrance, which plans to build

a parking structure at this site. This has been updated in Chapter 4, Corrections and Additions, of the Final EIR.

The project alignments along the Metro ROW would not eliminate any on-street parking. Based on conceptual designs, the Hawthorne Option would eliminate approximately 20 on-street parking spaces in the median of the street to allow for columns to support the elevated light rail guideway; these spaces would not be replaced.

126-5 Under CEQA, the reduction or elimination of parking in an urban setting is generally not considered a significant environmental impact in and of itself, particularly for a project designed to reduce vehicle miles traveled. Although secondary environmental effects associated with loss of parking could be considered environmental effects, no such impacts are anticipated here. However, to provide information to the public, Metro shared potential loss of parking as part of the 2023 Transportation Detail Report, published concurrently with the Draft EIR.

126-6 The High-Frequency Bus Alternative is considered an express service because it would feature some BRT characteristics, such as transit signal priority systems. As stated in Chapter 4, Evaluation of Alternatives, of the Draft EIR, the High-Frequency Bus Alternative could eliminate some on-street parking. As described in response to Comment 126-5, the Draft EIR appropriately does not consider a loss of parking, standing alone, to constitute a significant environmental impact. Furthermore, the removal of parking is not anticipated to result in secondary impacts, as it is unlikely to lead to a substantial increase in VMT, including idling cars, which could affect air quality. Additionally, sufficient street parking would remain available in the area, and since this is not a high-density corridor, overall parking demand is expected to be met without significant disruption.

126-7 The sentence cited the comment from Section ES.5-1 of the Draft EIR is not contradictory. The Draft EIR evaluates vibration impacts separately for potential damage and human annoyance. The 170th/182nd Grade-Separated Light Rail Transit Alternative (i.e., the LPA) would have a less than significant construction vibration impact with respect to *structural damage* after mitigation, but would still result in a significant and unavoidable impact related to *annoyance* during construction.

126-8 As described in Chapter 4, Evaluation of Alternatives, of the Draft EIR, while the High-Frequency Bus Alternative is the environmentally superior alternative, it would not achieve the same level of benefits with respect to VMT reduction, air quality improvements, GHG emission reduction, and energy savings compared to the Elevated/At-Grade Alignment and Options.

See response to Comment 126-1. Note that although the LPA has been selected, the Metro Board has not yet made a final decision on the project. The Metro Board will review the Final EIR, as well as factors such as costs, ridership, implementation timeframes, funding sources, and ability to achieve the project objectives, before making its final determination on the project.

126-9 As described in Chapter 2, Project Description, of the Draft EIR, existing at-grade crossings for freight would be upgraded and designed to be “quiet zone ready.” Existing at-grade

freight crossings to be upgraded would include Inglewood Avenue, Manhattan Beach Boulevard, 159th Street, 160th Street, 161st Street, 162nd Street, 170th Street, and 182nd Street. The "quiet zone ready" design includes site-specific safety infrastructure such as vehicle gates, pedestrian gates, signals such as lights and bells, and sidewalks and ramps that are all Americans with Disabilities Act (ADA) compliant and meet Federal Railroad Administration (FRA) standards. These improvements would enable local jurisdictions to apply for quiet zone designations, which would eliminate the routine sounding of train horns at these crossings.

Quiet zones are specific to freight horn noise and would not be applicable to the light rail bells. However, the LPA fully grade separates the light rail from vehicular and pedestrian crossings. As such, there would be no light rail transit bell noise at street crossings for the LPA.

126-10 This has been noted in Section 4.2, Corrections and Additions, of the Final EIR, with the Executive Summary revised to state the multiple overhead high tension transmission lines would need to be raised or relocated for the Hawthorne Option to ensure a safe clearance between the elevated light rail structure and utility lines. This change would not result in new or more severe visual impacts than already evaluated in the Draft EIR. The analysis considered the visual impacts of elevated light rail structures within an urbanized commercial corridor that already contains large-scale infrastructure, including overhead utilities. The incremental increase in height required to maintain safe clearances between the elevated guideway and utility lines would not introduce a new visual element or substantially increase the visibility, contrast, or dominance of the project. Therefore, the Draft EIR's conclusions regarding visual impacts of the Hawthorne Option remain valid.

126-11 The Executive Summary is intended to provide a high-level summary of the CEQA impact determinations and does not include detailed information about specific design elements. Noise and vibration impacts associated with the freight track relocation are evaluated in Section 3.6, Noise and Vibration, of the Draft EIR. See Chapter 2, Project Description, of the Draft EIR, Appendix 2-A Select Advanced Conceptual Engineering Drawings, of the Draft EIR, Chapter 2, Description of the Locally Preferred Alternative, of the Final EIR, and Final EIR Appendix B, Select Advanced Conceptual Engineering Drawings - Locally Preferred Alternative, for detailed information on freight track relocation.

126-12 This comment duplicates Comment 126-11. See the response to that comment.

126-13 The Executive Summary is intended to provide a high-level summary of the CEQA impact determinations and does not include detailed construction scheduling information. See Chapter 2, Project Description, of the Draft EIR and Chapter 2, Description of the Locally Preferred Alternative, of the Final EIR, which include information on the total construction duration and key tasks for the alignments. The purpose of an EIR is to assess potential environmental impacts of a project, rather than to provide detailed project management or scheduling information. While construction timelines are summarized in the EIR to aid in the evaluation of potential environmental impacts, detailed project schedules, such as those presented in Gantt Charts, are more relevant to project management and implementation and are not necessary for CEQA's environmental analysis requirements. Metro released a

summary of cost and schedule information in 2023, published concurrently with the Draft EIR, which was also included in the Board Report for the LPA selection in May 2024.

126-14 The cost estimates for the alignments include the cost of required property acquisitions, including south of 190th Street. Metro has been coordinating and would continue to coordinate closely with BNSF on the track design in this area to ensure that the designs meet their operational requirements and are feasible to construct. The project is designed as a 4.5-mile light rail extension between the Redondo Beach (Marine) Station and the Torrance TC. Sequencing future construction of the project to initially only extend to Redondo Beach would require direction from the Metro Board.

126-15 The proposed multi-use recreational path depicted in Figure 2.3-4 of the Draft EIR would be located between 159th and 170th Street within the City of Lawndale. As indicated in Section 2.3-1.1 of the Draft EIR, there is not sufficient room within the Metro ROW to extend the path south of 170th Street.

An additional multi-use path is planned between Grant Avenue and 182nd Street to connect neighborhoods to the north and south to the station at the Redondo Beach TC. While these paths would not be continuous throughout the entire corridor, they would provide key recreational and access points. Appendix 2-A, Select Advanced Conceptual Engineering Drawings, of the Draft EIR and Appendix B, Select Advanced Conceptual Engineering Drawings – Locally Preferred Alternative, of the Final EIR include additional details on the paths.

126-16 Quad gates and/or median barriers would be designed and constructed as part of the project. Metro would install all necessary quiet zone equipment, including quad gates, pedestrian gates, and signals, to enable the at-grade crossings to qualify for an Automatic FRA Approval for a quiet zone. However, the designation of a quiet zone requires the cities to apply to the FRA, as Metro does not have authority to establish quiet zones. Mitigation Measure MM-NOI-4: Quiet Zone Establishment commits Metro to working with the cities on the FRA application process. The term “quiet zone ready” in the text reflects this process and the project’s compliance with FRA requirements. The figure accurately represents the quad gate configuration that would be installed. As a result, revisions to the drawings are not necessary.

126-17 The term “Metro Leased to 3rd Party” refers to an area within the Metro ROW, that Metro has leased to a private property owner or entity for use of Metro property. Metro retains ownership of the property, but under the lease agreement, a third party is permitted to use the space.

126-18 The project would not add new parking at the Redondo Beach TC. Existing parking at this facility would continue to be available for transit users. At the Torrance TC, the Draft EIR identifies approximately 180 spaces for transit use, but Metro is not proposing to construct or own this parking directly. Instead, parking would likely be provided through a lease agreement with the City of Torrance, which plans to build a parking structure at this site. These parking spaces would support ridership at the terminus station but are not intended to replace existing parking on a one-to-one basis.

All stations would include the necessary vertical circulation elements, such as elevators, ramps, and stairs, to ensure accessibility for all users. The South Bay Galleria Station (Hawthorne Option) is an elevated station and would include escalators. At the Redondo Beach TC Station, the vertical circulation design depends on the alignment. Under the Elevated/At-Grade Alignment, the station would be elevated and include escalators and elevators. Under the Trench Option and the LPA, the station would be approximately 10 feet below grade and accessed via ramps to the platform, consistent with ADA requirements. These features are shown in the design drawings and would be included in the final station design.

The apostrophe in the sentence in Section 2.3-1.4 of the Draft EIR has been corrected in Section 4.3, Corrections and Additions, of this Final EIR.

126-19 In Fall 2024, Metro implemented a new operating pattern for the C and K Lines, which both serve LAX. Based on this operational change, the project would operate as an extension of the Metro K Line traveling north/south between the Metro E Line and Torrance. Based on the preliminary operations plan for the project, five additional vehicles would be required to operate this light rail extension.

126-20 The Executive Summary is focused on summarizing the CEQA impact determinations, so this additional detail was not added. Property acquisitions are not considered a CEQA impact. See the 2023 Real Estate Acquisition Report, published concurrently with the Draft EIR, which summarizes properties affected. See also the 2025 Real Estate Acquisition Report, published concurrently with this Final EIR, which summarizes affected properties for the LPA.

126-21 The Executive Summary is intended to provide a high-level summary of the CEQA impact determinations and does not include detailed information, such as construction staging areas. See the 2025 Real Estate Acquisition Report, published concurrently with the Final EIR, for a summary of potential construction staging areas for the LPA. These staging areas have been revised following the publication of the Draft EIR, and would also apply to the other Metro ROW alignments.

126-22 The construction tables and associated text in Section 2.4-3 of the Draft EIR reflect the total duration of each major task–overlapping has been accounted for in the overall schedule. Therefore, the tables already present an accurate representation of the construction timeline for the project and options. Chapter 2, Description of the Locally Preferred Alternative, of the Final EIR, includes the construction duration for the LPA. Concurrent with the Draft EIR, Metro published the 2023 Cost Estimate Summary, which includes a graphic comparing the preliminary construction schedules for the alignments and options studied in the Draft EIR.

126-23 Consistent with FTA and Metro requirements, the use of a future “Horizon Year” is standard practice when assessing the long-term effects of a proposed project. The Horizon Year (2042) allows for consideration of the project’s impacts in concert with other regional transportation projects and anticipated growth in population, employment, and land use over time.

The year 2021 represents the baseline for evaluating the project's potential effects on the existing environment, as it corresponds to the issuance of the Notice of Preparation and reflects conditions at the time the environmental review commenced. Using this year ensures an accurate environmental baseline for assessing impacts and is consistent with Section 15125(a) of the CEQA Guidelines. Additionally, the Metro Transportation Analysis Model is a tool that is updated periodically to assess future ridership of potential projects. The base year for ridership forecasts, 2017, is used to calibrate the model to existing (pre-pandemic) conditions.

126-24 Metro's BRT Vision and Principles Study identifies Hawthorne Boulevard between the cities of Inglewood and Torrance as one of the 30 corridors in the Strategic BRT Network, though it is not one of the top five priority BRT corridors. However, the C Line Extension to Torrance Project is a separate project, as it is specifically a study to extend the light rail line from the existing terminus in Redondo Beach to Torrance. A potential Hawthorne Boulevard BRT corridor is not analyzed in this study as it would be a separate project with a distinct scope and objectives.

126-25 No revisions are made in the Final EIR in response to this comment. The Executive Summary is focused on summarizing the CEQA impact determinations, so this additional detail was not added.

126-26 See Section 4.6, Corrections and Additions, of the Final EIR, for the requested revision. The revision addresses a minor style inconsistency present on page 3.2-31 of the Draft EIR and does not change the analyses or conclusions of the Draft EIR.

126-27 The first instance of KOP is spelled out in Section 3.2, Land Use and Planning, of the Draft EIR prior to Section 3-4.3.2 of the Draft EIR.

126-28 The requested revision is not necessary, as the SBCCOG's recommendation is indicated in Table ES-2 and Table ES-3 of the Draft EIR. No revisions are made in the Final EIR in response to this comment.

126-29 The requested revision is not necessary, as the SBCCOG's recommendation is indicated in Table ES-2 and Table ES-3 of the Draft EIR. No revisions are made in the Final EIR in response to this comment.

126-30 The requested revision is not necessary, as the SBCCOG's recommendation is generally summarized in Table ES-2 of the Draft EIR. Furthermore, as stated on page ES-17 of the Draft EIR, Table ES-2 shows a summary of the identified environmental impacts, mitigation measures, and level of significance after mitigation is applied, but detailed analyses of the topics in the table are provided in Chapter 3 of the Draft EIR. No revisions are made in the Final EIR in response to this comment.

126-31 See response to Comment 126-30. This same reasoning applies with respect to construction vibration impacts.

126-32 The Metro Board has considered and would continue to consider issues such as cost, ridership, implementation timeframes, and funding sources and availability, as part of their decision-making on the project.

126-33 In Section 4.21, Corrections and Additions, of the Final EIR, Table 4.5-1: Comparison of Alternatives' Environmental Impacts to the Proposed Project has been updated in the Final EIR to include a note defining the acronyms used in the table. The revision does not change the analyses or conclusions of the Draft EIR.

126-34 The SBCCOG's recommended text is already indicated on page ES-43 of the Draft EIR, which includes that the "No Project Alternative is evaluated in the context of the existing transportation facilities in the Project Area and other capital transportation improvements and/or transit and highway operational enhancements that are reasonably foreseeable." No revisions are made in the Final EIR in response to this comment.

126-35 The requested revision does not change the meaning or conclusions of the Draft EIR. No revisions were made in the Final EIR in response to this comment.

Submission 127 Anthony Higgins, California Department of Transportation – District 7

127-1 In addition to the three options listed here, the Draft EIR also evaluates a No Build, High-Frequency Bus Alternative, and the 170th/182nd Grade-Separated Light Rail Transit Alternative (now the LPA) in Chapter 4, Evaluation of Alternatives, of the Draft EIR. See MR-1: Selection of Alternatives.

127-2 Metro recognizes Interstate 405 (I-405), the San Diego Freeway, and State Route 107 (SR 107), a segment of Hawthorne Boulevard as Caltrans' facilities. In 2003, the segment of SR 107 within the City of Lawndale was relinquished to the city.

127-3 Caltrans's support for the project is acknowledged. The project's consistency with Caltrans's plans, statewide legislation, regional transportation planning efforts, and role in supporting policy goals to reduce VMT, improve air quality and promote alternative modes of transportation is also noted.

127-4 Metro would continue to coordinate with Caltrans for all necessary permits for design and construction of facilities that directly affect Caltrans facilities. The Hybrid Alternative selected as the LPA by the Metro Board would cross SR 107, and not affect I-405.

126-5 The SBCCOG's statement that no transportation safety impacts to state facilities are anticipated from the Elevated/At-Grade Alignment, provided all necessary permits and approvals are obtained through the Office of Permits, is noted. The LPA follows the Metro ROW and therefore remains consistent with the commentor's statement regarding transportation safety. The LPA meets the project's objectives and avoids transportation safety impacts, while avoiding or minimizing noise, vibration, and construction impacts compared to the project and Trench Option analyzed in the Draft EIR.

Submission 130 Brandy Forbes, City of Redondo Beach

130-1 The City's support for the Hawthorne Option is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

130-2 The comment is noted. All comments have been shared with the Metro Board for their consideration. Both Redondo Beach station locations studied in the Draft EIR would serve the South Bay Galleria and planned redevelopment area, which extends from Hawthorne Boulevard to Kingsdale Avenue and includes the existing Redondo Transit Center. The

proposed Hawthorne Station would be located closer to the northeastern corner of the redevelopment site, while the southwestern corner is closer to the Redondo Beach TC. The LPA would have a station along the Metro ROW, immediately adjacent to the Redondo Beach TC and within walking distance of the South Bay Galleria redevelopment area.

130-3 The City's interest in maximizing connectivity between the C Line extension and the Crenshaw/LAX Transit Corridor Project is noted. All comments have been shared with the Metro Board for their consideration. In Fall 2024, Metro implemented a new operating pattern for the Metro C and K Lines. Under this revised service plan, the project would operate as part of the K Line. All alignments studied in the Draft EIR would connect to LAX via the K Line. Metro modeled the estimated travel times between the Torrance TC and the LAX/Metro Transit Center Station for both the Metro ROW alignments and Hawthorne Option. The analysis found that both routes would have the same travel times, with an estimated 19-minute trip from Torrance to LAX/Metro Transit Center.

The 2023 Ridership Report, published concurrently with the Draft EIR, found that the Hawthorne Option would generate higher project trips and new riders than the alignments along the Metro ROW, but lower VMT reduction and travel time savings. Metro analyzed travel benefits in relation to construction cost estimates (see May 2024 Metro Board Report)[2] and found that the Hawthorne Option was less cost effective than the LPA. See MR-15: Metro Ridership Forecasting Methodology.

Additionally, the LPA would include a station along the Metro ROW, immediately adjacent to the Redondo Beach TC. Although the South Bay Galleria would be within walking distance of both the Redondo Beach TC (along the Metro ROW) and South Bay Galleria Station (included only as part of the Hawthorne Option), the LPA station would be better suited to directly serve rail to bus transfers at the Redondo Beach TC, as well as provide a more convenient drop-off and pickup location than the South Bay Galleria Station. Thus, the regional connectivity benefits that would be provided as part of the Hawthorne Option are similarly anticipated to be realized as part of the LPA, if not exceeded.

130-4 See MR-13: Soil Stability and Sinkholes. As set forth in Section 3.8-4.6 of the Draft EIR, existing geotechnical data indicates that the project would be feasible within the Metro ROW and would not result in significant impacts during construction or operation related to subsidence, collapse, or similar conditions. The Metro ROW is an established transportation corridor with existing infrastructure, and the area has not exhibited systemic geological instability in the form of recurrent sinkholes or similar concerns. The successful use of the Metro ROW over decades suggests it is geotechnically suitable for expanded transit use. The Metro ROW soil types are generally well-documented and do not present unusual risk factors for sinkhole formation under typical construction conditions. Per Project Feature PF-GEO-1: Metro Geotechnical Design Standards, site-specific geotechnical explorations would be conducted in the next design phase to guide engineering and construction practices. Metro has extensive experience conducting similar transit projects with comparable soil conditions, and proven techniques, such as controlled grading, compaction, and soil

[2] See the May 2024 Metro Board Report at https://boardagendas.metro.net/board-report/2024-0272/.

stabilization, would be employed based on the site-specific geotechnical analyses. Also see MR-13: Soil Stability and Sinkholes for additional information.

As described in MR-13: Soil Stability and Sinkholes, the sinkhole mentioned in the comment was reportedly caused by a broken irrigation line in the homeowner's yard. It is unclear whether the line break was the result of Shell's drilling activities, which differ significantly from the construction methods planned for the project, or due to unrelated factors. Drilling operations, especially those involving extraction, could alter subsurface pressure and create voids, increasing the risk of subsidence and sinkholes. In contrast, Metro's construction, including the planned trenching, would involve controlled excavation with no substantial extraction of subsurface materials that could destabilize soil layers. Additionally, as required by Project Feature PF-GEO-1: Metro Geotechnical Design Standards, the project would incorporate site-specific geotechnical evaluations and stabilization techniques, such as soil grouting and reinforced shoring, to ensure stability. These measures and best construction practices are designed to prevent soil disturbance that might otherwise lead to subsidence or sinkholes.

Section 3.8, Geology and Soils, of the Draft EIR has been revised in Section 4.12, Corrections and Additions, of the Final EIR, to include additional information on collapsible soils within the project area. The addition provides further clarity that there is a low risk related to subsidence and collapsible soils, and it does not change the conclusions of the Draft EIR.

130-5 See MR-4: Potential Negative Health Effects Related to Noise, Vibration, and Air Quality.

The City expresses concern about potential construction and operational noise and vibration impacts with the Metro ROW alignments. While Metro acknowledges these concerns, the comment does not fully reflect the Draft EIR. As described in Section 3.6, Noise and Vibration, of the Draft EIR, the Elevated/At-Grade Alignment would result in a significant and unavoidable operational impact at two sensitive receptor clusters located near the at-grade crossing at 170th Street. In contrast, the Trench Option and LPA, which would place the light rail in a trench below 170th and 182nd Streets, would eliminate the need for audible crossing signals. With implementation of Mitigation Measures MM-NOI-2: Soundwalls, MM-NOI-3: Low Impact Frogs, and MM-NOI-4: Quiet Zone Establishment, operational noise impacts for the Trench Option and LPA would be less than significant with mitigation. See Chapter 2, Description of the Locally Preferred Alternative, of the Final EIR for additional information regarding the LPA. Also see MR-3: Operational Noise Project Features and Mitigation Measures.

Regarding construction impacts, the Draft EIR concludes that all of the light rail alignment options and alternatives – the Elevated/At-Grade Alignment, Trench Option, Hawthorne Option, and 170th/182nd Grade-Separated Light Rail Transit Alternative (the LPA) – would result in significant and unavoidable construction-related noise and vibration impacts due to the intensity and proximity to work activities. To address the significant construction noise impact, the Draft EIR sets forth Mitigation Measure MM-NOI-1: Noise Control Plan, which requires preparation and implementation of a Noise Control Plan. The Noise Control Plan would control and monitor noise during construction through measures such as temporary noise barriers, use of quieter equipment, and ongoing monitoring to ensure compliance with the FTA construction noise impact criteria. Construction would typically occur between the hours of 7:00 a.m. and 6:00 p.m., in accordance with the most conservative of the local ordinance restrictions among all involved cities. However, pursuant to Mitigation Measure

MM-NOI-1: Noise Control Plan, Metro may also obtain a variance to conduct construction outside of the hours of the local ordinance, if required, which could include nighttime construction for certain construction processes.

Although Mitigation Measure MM-NOI-1: Noise Control Plan requires compliance with the FTA's 1-hour L_{eq} construction noise thresholds and includes continuous monitoring and corrective actions, the Draft EIR acknowledges that temporary exceedances may still occur due to the variable nature of construction. For this reason, construction noise impacts were conservatively identified as significant and unavoidable, even with implementation of all feasible mitigation.

A similar conclusion is reached for construction vibration impacts. Without mitigation, the Elevated/At-Grade Alignment, the Trench Option, and the LPA could exceed FTA damage criteria (0.2 in/sec PPV) at 133 structures. The Hawthorne Option would affect 11 structures. Mitigation Measures MM-VIB-1: Vibration Control Plan through MM-VIB-3: Pre- and Post-Construction Surveys require preparation of a Vibration Control Plan, equipment restrictions near sensitive structures, and pre- and post-construction building surveys with repairs if damage is determined to be related to construction. With these measures, damage-related impacts would be reduced for the Trench Option, the Hawthorne Option, and the LPA, but one residual damage impact would remain under the Elevated/At-Grade Alignment due to impact pile driving near Grant Avenue. In all alignment scenarios, vibration annoyance during construction is anticipated to be significant and unavoidable, as not all equipment types could feasibly be replaced or modified to reduce perceptible vibration at nearby residences.

As stated on pages 3.6-34 and 3.6-48 of the Draft EIR, while it is unlikely for construction noise to result in noise-induced hearing loss for persons residing or working near construction zones, construction noise and vibration could increase stress at affected sensitive uses. Although sleep disturbances cannot entirely be ruled out, the potential for stress-increasing disturbances is anticipated to occur primarily during daytime hours, given the expected hours of construction discussed above.

As evidenced by the foregoing conclusions, the Draft EIR does not understate the effects of the Elevated/At-Grade Alignment and Options. The Metro Board will consider all environmental effects identified by the Draft EIR.

130-6 See MR-12: Emergency Access. As explained therein, the addition of light rail at the 182nd Street at-grade crossing would increase gate down times compared to existing conditions but would not prevent emergency access or create life-threatening delays. Emergency response times are influenced by various factors beyond traffic delays at specific crossings, including dispatch patterns and alternative routing options. For example, all areas on either side of the 182nd Street crossing could be accessed within a 0.5-mile by alternative grade-separated routes, unaffected by train frequency. While McCormick Ambulance Services currently operates near the 182nd Street at-grade crossing, as a private business, McCormick is not restricted to this location and could adjust its base location if future needs arise. Any such relocation of McCormick Ambulance Services, or a similar private business, would likely occur within already developed commercial or industrial properties, involving leasing or minor modifications to existing structures rather than new construction, and would utilize existing infrastructure

It should be noted that the LPA eliminates the need for an at-grade light rail crossing at

182nd Street with a short trench. The LPA would fully grade separate light rail, thereby preventing any light rail-related gate down times and would preserve current conditions where only occasional freight crossings affect the roadway.

130-7 See MR-13: Soil Stability and Sinkholes, as well as response to Comment 130-4.

As the City notes, the Draft EIR included a review of many reports and studies related to soils within the RSA, including areas near Ruxton Place and the Metro ROW, and assessed the likelihood of hazards. Based on this information (see in particular, Section 3.8-4.6), the Draft EIR concludes that the risk of soil instability, including subsidence or collapse, would be a less than significant impact. With respect to the two additional documents recommended by the City, the 2019 South Bay Galleria EIR pertains to a different development project on a separate site and does not contain information directly relevant to the light rail alignment. However, the South Bay Galleria EIR does describe the same general geologic conditions within the region as those presented in the Draft EIR for the proposed light rail extension. The South Bay Galleria EIR also describes findings from a geotechnical report specific to the Galleria site. While those findings are not directly applicable to this project, they recommend similar design and construction methods to those Metro would implement, such as excavating poor soils and replacing them with engineered fill in accordance with building code requirements.

The City did not provide the full Ninyo & Moore study, but rather an excerpt within their comment letter. The excerpt includes soil testing results from a single boring conducted at an unspecified location along the alignment. According to the excerpt, samples were collected within the upper 10 feet using a hand auger, with results indicating loose to medium silty and clayey sands; no groundwater was encountered to a depth of 10 feet. A lab result for a different location included in the excerpt indicated sandy material at that site. Although the exact locations of these borings are unknown, the soil descriptions are consistent with those identified in Section 3.8 of the Draft EIR and the 2023 Geotechnical Data Report, which supports the Draft EIR engineering plans and includes a review of past geotechnical investigations conducted within the project area.

Consideration of these two documents does not alter the conclusions of the Draft EIR, which adequately assesses the likelihood of geologic and seismic impacts in accordance with CEQA. No new data has emerged to suggest that the Draft EIR conclusions require revisions.

Finally, Metro coordinates with utility owners throughout the planning and design process to identify the precise location of pipelines and other infrastructure. This process includes evaluating potential conflicts and development design solutions such as relocation or protection-in-place, particularly in areas with known geotechnical constraints. This coordination is already underway and would continue as part of future design phases, consistent withs standard Metro engineering practices and industry norms.

130-8 The City suggests that the Hawthorne Option may present more favorable subsurface conditions due to its location along the historic Red Car Route. However, although the Hawthorne Option traverses a different corridor than the Metro ROW alignments, soil conditions are similar and within the same geologic unit. As discussed in Section 3.8, Geology and Soils, of the Draft EIR, based on preliminary assessment of the geological conditions, soil stability concerns, including risks from unstable soils, are not anticipated along any of the alignments. The 2023 Geotechnical Data Report, prepared to support the Draft EIR engineering plans, reviewed past geotechnical investigations, including a Caltrans

boring log near Hawthorne Boulevard and 166th Street. This historic log indicates the soil types are similar to the soils along the Metro ROW, which are loose to medium sandy materials at upper depths and clayey sands farther down. There is no evidence to suggest that soil conditions along the Hawthorne Option are materially more stable than those along the Metro ROW. Even if the Red Car operated safely within Hawthorne Boulevard in the past, it was an at-grade system, whereas the Hawthorne Option would be entirely elevated and subject to different structural requirements, regardless of underlying geologic conditions. Finally, it should be noted that soils beneath the Metro ROW have performed without issues under the freight trains, which are considerably heavier than light rail trains.

130-9 See MR-11: Traffic Delay and Level-of-Service, which explains that, under CEQA, vehicle delay and intersection level of service (LOS) are no longer treated as environmental impacts pursuant to Senate Bill 743 and the CEQA Guidelines. Accordingly, the Draft EIR does not evaluate LOS as a significance criterion under CEQA. However, Metro also prepared a Transportation Detail Report (January 2023), published concurrently with the Draft EIR, to provide a more detailed operational analysis of the effects of the project alignments on traffic intersection operations as well as effects on bus route integration and public on-street parking. This report includes evaluation of the intersections near 182nd Street, the South Bay Galleria site, and the Redondo Beach Transit Center. These evaluations are based on observed traffic data and account for the functional importance of 182nd Street in the local circulation network. Thus, how a roadway is classified (such as the arterial classification) does not affect the adequacy of the analysis of the foregoing documents. Regarding cumulative impacts, the Draft EIR incorporates reasonably foreseeable growth in the project area, including high-density residential development identified in Redondo Beach's Housing Element and General Plan. These growth projections were reflected in the background traffic assumptions used in the transportation analysis.

130-10 As explained in Section 3.1-4 of the Draft EIR, CEQA no longer treats delay or congestion, including at intersections or due to rail crossings, as a significant environmental impact (see CEQA Guidelines Section 15064.3(a)), and the Draft EIR appropriately focuses on VMT and policy consistency. Section 3.1-4.1 of the Draft EIR analyzes whether the project would conflict with local transportation policies, including those intended to protect neighborhoods from cut-through traffic and unsafe speeds. The analysis concludes on page 3.1-45 that the Elevated/At-Grade Alignment would not conflict with such policies, as it would not preclude cities from implementing measures to deter cut-through traffic. Moreover, the project stations are locally serving and located on or near major corridors, which reduces the potential for new cut-through traffic patterns. The Trench Option and LPA would grade separate light rail from the roadway at 182nd Street.

Section 3.1-4.1 of the Draft EIR acknowledges that the Elevated/At-Grade Alignment could incrementally increase delay at 182nd Street due to the light rail crossing, but it does not rely on municipal actions to reach a conclusion of less than significant. Instead, the analysis finds that the project supports VMT-reduction goals by providing an alternative to vehicle trips and is consistent with general plan policies, such as Redondo Beach General Plan Goal G1 to "address the root cause of trip generation rather than simply reacting to the consequences."

Note that the Trench Option and LPA would both eliminate any light-rail-related traffic stoppage at 182nd Street, due to the previously mentioned grade separations from all roadways, thereby further reducing the potential for cut-through traffic.

130-11 As described in Chapter 2, Project Description, of the Draft EIR, the existing freight crossings at 170th and 182nd Street would feature freight safety crossing gates and other crossing protections, and pedestrian upgrades on both sides of the tracks and street, which would be an improvement over existing conditions. For bicyclists, the design ensures that the railroad tracks would be crossed at a perpendicular angle, which minimizes the risks of tires catching in the gaps, a key consideration for bicycle safety. The LPA would grade separate light rail at 170th and 182nd Streets eliminating any new at-grade crossings for light rail at these intersections and further reducing potential safety concerns for pedestrians and bicyclists.

130-12 See response to Comment 130-10 regarding how the Draft EIR evaluated the potential for the Elevated/At-Grade Alignment to conflict with local and regional programs, ordinances, or policies addressing the circulation system (see Section 3.1-4.1 of the Draft EIR). The analysis considers the effect of train frequency and crossing activity on intersection operations, including at Inglewood Avenue and 182nd Street. Under the Elevated/At-Grade Alignment, light rail would be grade-separated at Inglewood Avenue but would cross 182nd Street at-grade, where additional train activity could result in intermittent delays due to gate closures. The Draft EIR concludes that this alignment would not conflict with local or regional transportation plans, in part because it does not preclude cities from implementing cut-through traffic minimization efforts and supports broader VMT-reduction goals. For reference, the Trench Option, Hawthorne Option, and LPA would grade separate the light rail from all roadways, avoiding these types of delays altogether.

130-13 Noise monitoring locations are shown in Figure 3.6-7 and Figure 3.6-8 of the Draft EIR. To identify existing noise conditions near the project, Metro conducted noise measurements at multiple representative locations, including locations 17 and 18 on Condon Avenue, south of Artesia Boulevard, and location 23, south of 182nd Street at Ralston Lane and Firmona Avenue. Additional noise measurements were taken at locations 20, 24, 25, 26, and 27, all of which are south of 182nd Street.

The noise measurement locations were selected in accordance with the FTA's Transit Noise and Vibration Impact Assessment Manual (2018), which permits representative measurements at locations with similar noise conditions to other sensitive receptors in the vicinity. As discussed on page 3.6-17 of the Draft EIR under Section 3.6-2.2.1, Existing Noise Conditions, this approach allows noise assessments to capture accurate baseline data for analysis without the need for measurements at every individual site. The methodology and monitoring locations were chosen to ensure an accurate representation of the ambient noise environment in the project area.

130-14 See response to Comment 130-5 and MR-3: Operational Noise Project Features and Mitigation Measures. Metro would install all the required Quiet Zone freight improvements and equipment and is committed to supporting the cities with the FRA application, although it is the cities' decision on whether to pursue it.

130-15 See MR-2: Operational Noise Analysis and Impact Thresholds for a detailed discussion on how noise and vibration impacts were evaluated in the Draft EIR. Metro, as the CEQA lead agency, has the discretion to determine the appropriate significance criteria for the project and has utilized the FTA's noise impact criteria, which was specifically developed to address transit noise based on well-documented criteria and research on human response to community noise.

The FTA methodology is appropriate because it accounts for both existing ambient noise conditions and the sensitivity of nearby receptors. In contrast, fixed noise level limits, such as those established by the Redondo Beach Municipal Code (RBMC) Section 4-24.301, do not reflect ambient conditions and may already be exceeded in urban areas. For example, For instance, Table 3.6-17 of the Draft EIR shows that existing ambient noise levels at the many sensitive receptor locations near the Trench Option already exceed the RBMC standards, even without the project.

Regarding operational hours, Metro's light rail system, consistent with regional transit standards, may operate during early morning and late evening hours. These service hours are accounted for in the Draft EIR's analysis, which evaluates whether the noise generated would result in substantial adverse impacts.

With respect to vibration, the Draft EIR applies FTA criteria that distinguish between human annoyance and structural damage. These criteria are tailored to transit projects and reflect the type and duration of vibration exposure. Where vibration thresholds are predicted to be exceeded, mitigation measures have been identified.

Importantly, the project does not violate RBMC Section 4-24.301. State law preempts the application of local zoning and land use regulations to Metro on property it owns or operates (see *Rapid Transit Advocates, Inc. v. Southern California Rapid Transit District* (1986) 185 Cal.App.3d 996). In fact, RBMC Section 4-24.604 expressly states that the City's noise standards "shall not apply to any activity the regulation of which has been preempted by state or federal law." Because the Metro ROW is owned by Metro and the project is a state-authorized public transit use, these standards do not apply.

130-16 The mitigation measures that are proposed in the Draft EIR are designed to address vibration impacts for the life of the project.

As detailed in Sections 3.6-5 and 4.5-3.6.4 of the Draft EIR, the Elevated/At-Grade Alignment, Trench Option, and LPA (the 170th/182nd Grade-Separated Light Rail Transit Alternative) would be subject to Mitigation Measures MM-VIB-4: Low Impact Frogs, MM-VIB-5: Resilient Fasteners, and MM-VIB-6: Ballast Mats to reduce vibration generated by light rail and freight operations. These measures are designed to achieve at least a 10 dB vibration reduction and ensure that the resulting vibration levels remain below FTA criteria (80 VdB for freight and 72 VdB for light rail). The final design would verify the specific locations where these components are needed through a site-specific Detailed Vibration Assessment, consistent with FTA guidance, Section 6.5. See MR-6: Vibration Analysis During Final Design.

Each mitigation component is designed for long-term durability. Similar track components to address vibration are widely used in modern rail systems and are engineered for extended service life. Based on general manufacturer specifications and industry best practices, these components are anticipated to remain effective for decades under normal operating conditions.

Furthermore, Metro has established track inspection and maintenance protocols to ensure the continued effectiveness of the track system, including low-impact frogs, resilient fasteners (e.g., rail clips shoulders, elastic rail clips, and elastomer pads) and ballast mats. Per these protocols, low-impact frogs would be inspected for wear and resurfaced or

replaced as needed, resilient fasteners would be regularly checked to ensure they remain securely fastened and repaired or replaced as needed, and ballast mats would be assessed for wear and reinforced or replaced when necessary. Additionally, rail lubricators would be placed and maintained where excessive rail wear or wheel-rail friction may occur. This standard monitoring and maintenance would further ensure that the mitigation measures, which are already designed for long-term durability, remain effective in minimizing vibration impacts throughout the life of the project.

Additionally, the City states that "there are already vibration impacts as a result of the existing freight operations." Under CEQA, existing effects from current freight operations do not constitute an environmental impact. Rather, such effects are part of the baseline physical conditions against which the Draft EIR evaluates the effects of the project (see CEQA Guidelines Section 15125(a)). Based on the age of the existing freight rail tracks and freight rail historical practices, the existing freight rail tracks within the existing Metro ROW are reasonably assumed to include little to no vibration-reducing features. The vibration-reducing features incorporated as mitigation for the project would, therefore, represent an improvement over the existing baseline conditions, further reducing vibration effects within the corridor.

130-17 The FTA general assessment method used in the Draft EIR is designed to be conservative, meaning it is intended to ensure that vibration impacts are not underestimated at this preliminary stage. Pursuant to Mitigation Measures MM-VIB-4: Low Impact Frogs, MM-VIB-5: Resilient Fasteners, and MM-VIB-6: Ballast Mats, during final design, a Detailed Vibration Assessment would be conducted, which would include site-specific testing and engineering to tailor the final mitigation measures to actual conditions. This detailed assessment during final design would identify, if necessary, refinements of the mitigation methods to ensure that vibration levels do not exceed the FTA significance criteria for vibration impacts (80 VdB for freight and 72 VdB for light rail). In compliance with CEQA, in the unlikely event that the Detailed Vibration Assessment identifies any new significant impacts not previously disclosed, or if previously disclosed impacts are found to be more substantially more severe, Metro would assess whether supplemental CEQA review is required. However, the conservative approach taken in the Draft EIR makes this unlikely, as the general assessment method likely overstated impacts and the mitigation measures identified in the Draft EIR are adaptable and expected to be sufficient to achieve the required vibration reduction levels. See MR-6: Vibration Analysis During Final Design.

130-18 The comment is correct. As detailed on page 3.4-55 in Section 3.4, Air Quality, of the Draft EIR, the Trench Option would have a significant and unavoidable impact during construction related to NOx emissions.

130-19 Metro acknowledges that construction activities would generate dust and has conducted a detailed air quality analysis of particulate matter impacts. Fugitive dust emissions associated with construction activities were estimated using CalEEMod, which is a model approved by SCAQMD. The model estimates fugitive dust emissions from heavy-duty equipment movements on unpaved roads, truck loading, and stockpiles. While the overall project is estimated to take six years of construction along the corridor, the duration of construction tasks would be shorter at individual locations. The analysis, starting in Section 3.4-4.3.1, Air Quality, of the Draft EIR, on page 3.4-33, demonstrates that fugitive dust (PM_{10}) emissions would not exceed the regional significance threshold established by SCAQMD. In addition, the analysis starting in Section 3.4-4.1.1 of the Draft EIR on page 3.4-45 demonstrates that

PM_{10} emissions would not exceed the localized significance threshold established by SCAQMD, even at peak construction phases. Page 3.4-25 of the Draft EIR identifies the best available control measures that project contractors would be required to implement. These requirements would substantially control fugitive dust—by between 36% and 91%, depending on activity—and other air pollutant emissions during all construction activities. While it is inevitable that construction activities would generate some level of fugitive dust, based on guidance promulgated by SCAQMD, these impacts would remain at a less-than-significant level. See MR-4: Potential Negative Health Effects Related to Noise, Vibration, and Air Quality for additional information.

130-20 Section 3.9, Hazards and Hazardous Materials, and Section 4.5-3.11.1 (evaluation of the LPA, the 170th/182nd Grade-Separated Light Rail Transit Alternative) of the Draft EIR, analyzes the potential for the project to create a hazard through the accidental release of hazardous materials into the environment, which includes an analysis of existing oil and gas pipelines (specifically, see Section 3.9-4.2 of the Draft EIR). As discussed in Section 3.9-4.2.1 of the Draft EIR, Metro obtained as-built drawings from the utility owners and has developed preliminary plans for each existing utility line, which could include relocation or protection-in-place. In the next phase of design, Metro would conduct additional surveys and potholing to confirm the utility locations and finalize relocation or protection requirements to prevent conflicts during construction. Project Feature PF-US-1: Utility Identification and Coordination requires Metro to coordinate closely with utility owners prior to construction to identify appropriate protection or relocation measures and to comply with all applicable safety protocols. This coordination includes taking into account the material condition of each utility, including any vulnerabilities such as aging or brittleness.

Based on the above, the Draft EIR concludes the potential impact related to oil and gas pipelines for the Elevated/At-Grade Alignment, Trench Option, and LPA would be less than significant. See MR-7: Utility Relocation and Hazardous Materials Safety.

130-21 See MR-8: Light Rail and Freight Train Safety.

130-22 Pipeline location is considered sensitive information for security reasons and, therefore, is not disclosed within public environmental documents. However, as discussed in Section 3.9-4.2.1, Hazards and Hazardous Materials, of the Draft EIR, Metro obtained as-built drawings from the utility owners, and developed preliminary plans for each utility line, which could include relocation or protection-in-place. The project would not exacerbate the need for pipeline maintenance or increase risks to pipeline integrity. Ongoing maintenance or repair would be the responsibility of the pipeline owners, who follow regulatory standards for inspection and maintenance to ensure safety. See MR-7: Utility Relocation and Hazardous Materials Safety.

130-23 Section 3.7, Biological Resources, of the Draft EIR, analyzes impacts to urbanized avian species protected under federal and state regulations that have potential to occur within the RSA (specifically, see Section 3.7-4.1.1). This includes resident birds of prey such as red-tailed hawks and great-horned owls. Portions of the RSA provide urbanized avian species with both suitable breeding and foraging habitat in the form of trees, vegetation, and man-made structures. Adequate mitigation is included through Mitigation Measures MM-BIO-1: General Protection Measures to Avoid and Minimize Impacts on Sensitive Biological Resources, MM-BIO-2: Nesting Bird Season Restrictions and Pre-Construction Surveys, and MM-BIO-3: Roosting Bat Restrictions and Survey Requirements, which all outline specific

preventative and protective actions that would mitigate impacts to local wildlife, including protected hawk and owl species.

130-24 See response to Comment 130-23. Mitigation Measures MM-BIO-1: General Protection Measures to Avoid and Minimize Impacts on Sensitive Biological Resources, MM-BIO-2: Nesting Bird Season Restrictions and Pre-Construction Surveys, and MM-BIO-3: Roosting Bat Restrictions and Survey Requirements outline specific actions that would mitigate potential impacts to local wildlife. These mitigation measures are based on established best practices for environmental protection and are specially designed to avoid or minimize potential impacts to protected wildlife with potential to occur in the RSA, ensuring those impacts are reduced to less-than-significant levels. The comment does not specify any additional mitigation measures that the Metro should consider or information suggesting that the existing mitigation measures would not be effective at reducing impacts to less than significant.

130-25 First/Last Mile (FLM) projects and the C Line (Green) Extension to Torrance project are planned and conducted as parallel but distinct processes, with independent community engagement efforts and recommendations. Metro's First/Last Mile Guidelines (2021), described on page 3.15-5 of the Draft EIR, define Metro's role in assisting with the planning, design, and implementation of FLM improvements for transit capital projects. As set forth in the FLM Guidelines, although Metro provides early-phase planning support for FLM improvements, the responsibility for the design, environmental clearance, implementation, and maintenance of those improvements ultimately lies with the local jurisdictions, which serve as the lead agencies for these projects. FLM improvements extend beyond the immediate station area (up to a half-mile for pedestrian infrastructure and up to three miles for bicycle improvement) and are, therefore, considered separate from the larger transit project. Implementation of the FLM projects is not dependent on the C Line (Green) Extension to Torrance project, nor is the C Line (Green) Extension to Torrance project dependent on the FLM projects for implementation.

130-26 Metro would undertake a bus-rail interface study prior to the start of revenue service to determine if adjustments are needed to existing or planned bus routes to align with the service provided by the light rail line extension. Metro would continue to coordinate with the South Bay Social District on connections between future development and the rail station.

130-27 The City's reference to the "Del Amo Mall" is assumed to mean the Del Amo Fashion Center, which is located nearly one mile to the southwest of the Torrance Transit Center Station. Due to this distance, the project does not propose new methods of dedicated connectivity to the Del Amo Fashion Center. However, if the City intended instead to refer to the South Bay Galleria or other nearby commercial areas, the Draft EIR does address pedestrian connectivity in that vicinity. See Section 2.3 of the Draft EIR.

130-28 The project does not include parking at the South Bay Galleria Station. Based on Metro's system experience, the majority of rail passengers do not drive to stations. Metro's published data from its annual On-Board Customer Satisfaction Surveys show that at nearly all stations, most riders access the train by walking, bicycling, or transferring from buses. Even at stations where parking is provided, most station parking is not fully utilized under normal circumstances. Thus, the proposed South Bay Galleria Station is expected to have a similar pattern of people accessing the station by foot, bicycle, or bus.

130-29 Corrections and additions are published in Chapter 4, Corrections and Additions, of the Final EIR. The revisions amplify and clarify the information in the Draft EIR, but do not include significant new information, as defined by CEQA Guidelines Section 15088.5(a), such as evidence of a new significant impact or a substantially more severe significant impact beyond what was identified in the Draft EIR.

130-30 Chapter 4, Evaluation of Alternatives, of the Draft EIR, provides details on the No Project Alternative and explains the basis for any significant and unavoidable impact conclusions.

130-31 The City's support for the Hawthorne Option is noted. All comments have been shared with the Metro Board for their consideration. The Metro Board has not yet selected a final alignment or approved the project. Although the fully grade-separated LPA, which follows the Metro ROW, has been identified for the purposes of the Final EIR, all options and alternatives evaluated in the Draft EIR remain under consideration. See MR-1: Selection of Alternatives.

130-32 See MR-1: Selection of Alternatives, which explains the reasons why the Metro Board selected the Hybrid Alternative as the LPA. The Hawthorne Option would require the permanent acquisition of several private properties to construct and operate the elevated light rail, particularly where the alignment transitions from the Metro ROW to public streets. During the advanced conceptual engineering phase, Metro worked to minimize impacts to private properties in the development of all alignment options, including the Hawthorne Option. Metro has designed the project to avoid displacement of residents. It would not be feasible to construct and operate the Hawthorne Option alignment without permanently acquiring non-residential properties, which would in turn affect their associated businesses. The properties affected are summarized in the 2023 Real Estate Acquisition Report. As discussed therein, the Hawthorne Option would require permanent full acquisition of seven commercial properties and permanent partial acquisition of five commercial properties between Marine Avenue and 190th Street.

130-33 See MR-11: Traffic Delay and Level-of-Service. Section 3.2-4.2 of the Draft EIR evaluates the project's consistency with any land use plan, policy, or regulation *adopted for the purpose of avoiding or mitigating an environmental effect*. Under CEQA, "automobile delay, as described solely by level of service or similar measures of vehicular capacity or traffic congestion shall not be considered a significant on the environment." (Public Resources Code Section 21099(b)(2)). Note that Metro published the 2023 Transportation Detail Report concurrently with the Draft EIR. The 2023 Transportation Detail Report describes the estimated future conditions in 2042 without the project and analyzes the traffic circulation effects (LOS) on intersection delay and queues for the project.

130-34 The 2023 Ridership Report was published concurrently with, but not as part of, the Draft EIR. The 2023 Ridership Report provides information regarding projected ridership for the project.

130-35 If the No Project Alternative or a non-rail alternative were ultimately approved, Metro would need to reprogram the funds under Measure R and Measure M. It is likely that Metro would lose the $231.3 million TIRCP state grant.

130-36 Metro has not analyzed the use of the Metro ROW for standalone active transportation projects (e.g., dedicated bike or pedestrian paths) in the absence of the proposed light rail project. The current environmental analysis is focused on evaluating the impacts of the

proposed transit project and its options and alternatives. While the Metro ROW light rail alignments would include pedestrian and bicycle improvements to enhance multimodal access, broader re-use of the corridor for other active transportation would not meet most of the basic objectives of the project and would require a separate planning effort outside the scope of this EIR.

130-37 Metro does not have this information. The comment does not raise significant environmental issues requiring a response under CEQA Guidelines section 15088(a) or otherwise address the adequacy of the Draft EIR.

130-38 The comment does not raise any significant environmental issues or address the adequacy of the Draft EIR. See MR-9: Light Rail Security for more information on the security of Metro's light rail facilities.

130-39 CEQA does not require an analysis of safety in terms of crime, and therefore, the Draft EIR does not make any conclusions regarding this topic. Metro is committed to integrating safety into all Metro rail operations. See MR-9: Light Rail Security for more information on Metro's commitment to safety.

130-40 Objective 10.10 of Section 4.0, Environmental Hazards/Natural Hazards, of the City of Redondo Beach General Plan is to: "Minimize the noise effects of railroad transit (freight and passenger) on residential uses and other sensitive land uses." The project is consistent with this objective because it includes project features and would implement mitigation measures to reduce both noise from light rail operation and noise from the combined freight track relocation and light rail operations. Specifically, Mitigation Measures MM-NOI-2: Soundwalls and MM-NOI-3: Low Impact Frogs would minimize noise associated with light rail operation. Additionally, Project Feature PF-NV-1: Quiet Zone Equipment Installation and Mitigation Measure MM-NOI-4: Quiet Zone Establishment would reduce noise associated with relocation of the freight tracks. Notably, as discussed in Section 3.6, Noise and Vibration, of the Draft EIR, most of the noise associated with freight trains is caused by their warning horns, which produce noise levels of approximately 110 dBA. Pursuant to Project Feature PF-NV-1: Quiet Zone Equipment Installation, the project would install the equipment necessary to allow designation of a quiet zone, which would enable local jurisdiction to establish quiet zones. The establishment of a quiet zone would eliminate freight horn soundings within a quarter-mile of the railroad crossings, from Inglewood Avenue to 182nd Street within the City of Redondo Beach. In most instances, with the establishment of a quiet zone, freight trains would actually be quieter than existing conditions, even though the tracks would be in closer proximity to some sensitive receptors. See MR-2: Operational Noise Analysis Methodology and Impact Thresholds and MR-3: Operational Noise Project Features and Mitigation Measures.

130-41 Policy 10.10.1 of the City of Redondo Beach General Plan requires the City to work with railroad operators to properly maintain lines and operational restrictions during early morning and late evening hours to reduce adverse noise impacts in residential and other noise-sensitive areas. The project would not preclude the City from implementing this policy. To the contrary, the project includes mitigation measures and project features that address noise levels associated with light rail operations and the relocation of the freight tracks. The ROW alignments would enable the City of Redondo Beach to establish a quiet zone, which would reduce adverse noise impacts in residential and other noise sensitive areas by eliminating horn soundings within a quarter-mile of the railroad crossings extending from Inglewood Avenue to 182nd Steet, See also MR-2: Operational Noise

Analysis Methodology and Impact Thresholds and MR-3: Operational Noise Project Features and Mitigation Measures.

130-42 Metro takes safety seriously and has incorporated design features to prevent unauthorized access to the light rail guideway. Among other things, the project would include physical barriers along the entire light rail guideway, restricting access into the light rail guideway. While Metro's safety features are primarily focused on people, these physical barriers would also provide a level of protection for terrestrial pets and wildlife by preventing access to the operational rail tracks. See MR-8: Light Rail and Freight Train Safety.

130-43 Based on their age and historical practices for freight rail, it is reasonable to assume that the existing freight rail tracks within the existing Metro ROW include little to no vibration-reducing features. In contrast, the project would include vibration mitigation measures for freight, including resilient fasteners (Mitigation Measure MM-VIB-5: Resilient Fasteners) and ballast mats (Mitigation Measure MM-VIB-6: Ballast Mats), which, as discussed in Section 3.6-6.2.2, Noise and Vibration, of the Draft EIR, would reduce vibration levels to below the FTA threshold for vibration annoyance. These measures would reduce vibration impacts on nearby sensitive receptors to less than significant with mitigation, including in high-density residential areas. See MR-5: Vibration Impact Types and Impact Thresholds.

130-44 See responses to Comments 22-57 to 22-59. As described in Section 3.3, Aesthetics, of the Draft EIR, lighting for the project would be installed consistent with the applicable Metro Design Standards, which prioritize safety while minimizing impacts to nearby sensitive receptors. The lighting associated with the trains themselves, such as headlights, would be designed to ensure visibility and safety during operation but would be unlikely to create significant light and glare impacts due to its limited and intermittent nature. Furthermore, the light rail is grade-separated for the Trench Option, Hawthorne Option, and LPA. The only location where the trains are not grade-separated from roadways is at 170th and 182nd Streets for the Elevated/At-Grade Alignment. Lighting at these two intersections and along the light rail tracks would adhere to applicable safety and design standards, with measures in place to limit glare and light spillover to adjacent properties. The lighting and materials would be similar to what is used in other Metro light rail projects currently in operation, which have demonstrated minimal concerns or complaints from nearby communities. Non-reflective surfaces would be used as feasible, and in compliance with applicable local regulations and Metro Design Standards.

130-45 The High-Frequency Bus Alternative is less costly and was identified as the environmentally superior alternative, because it would result in fewer significant environmental impacts compared to the rail alignments. However, it would not achieve the same capacity, speed, or reliability as light rail transit. Unlike the light rail options, the High-Frequency Bus Alternative would operate on congested city streets, reducing travel time and reliability. Ridership for the High-Frequency Bus Alternative was projected to be very low, with only 4,000 new trips generated, compared to 11,500 new trips for the Elevated/At-Grade Alignment, Trench Option, and LPA. Compared to light rail, the High-Frequency Bus Alternative is not able to significantly reduce VMT and associated air pollution and GHG emissions.

The High-Frequency Bus Alternative was evaluated as a distinct transit mode with operational characteristics tailored to maximize its effectiveness within the corridor. Unlike the Elevated/At-Grade Alignment and Options, which would become part of the regional rail network, the High-Frequency Bus Alternative was proposed to have more frequent stops to

reflect the typical operating characteristics of bus transit, which is better suited for serving local trips and is why stop frequency is much higher. The High-Frequency Bus Alternative was defined as a rapid bus service that would travel on the existing roadway network, with stops at major intersections like other rapid routes within the Metro bus system. Evaluating a High-Frequency Bus Alternative with only two stops would not provide an accurate comparison, because reducing stops would diminish the accessibility benefits of bus transit, which is designed to serve more localized trips compared to light rail. Additionally, reducing the bus stop frequency to only two stops would further reduce the ridership. Therefore, there would be no justification for providing the service. The High-Frequency Bus Alternative, as evaluated in the Draft EIR, ensures that each alternative is assessed realistically based on its inherent capabilities and typical use case and providing decision-makers and the public with the most useful comparison. Finally, even if Metro were to consider a High-Frequency Bus Alternative with only two stops, that alternative would still not match the light rail's capacity, reliability, or speed, as buses would continue to operate on congested streets.

Should a light rail alignment not be approved for implementation, Metro would determine how to reprogram the funding at a future date.

130-46 This comment duplicates a portion of Comment 130-6. See the response to that comment.

130-47 This comment duplicates a portion of Comment 130-6. See the response to that comment.

130-48 This comment duplicates a portion of Comment 130-7. See the response to that comment.

130-49 This comment duplicates Comment 130-8. See the response to that comment.

130-50 This comment duplicates Comment 130-9. See the response to that comment.

130-51 This comment duplicates Comment 130-10. See the response to that comment.

130-52 This comment duplicates Comment 130-11. See the response to that comment.

130-53 This comment duplicates Comment 130-12. See the response to that comment.

130-54 This comment duplicates Comment 130-14. See the response to that comment.

130-55 This comment duplicates a portion of Comment 130-15. See the response to that comment.

130-56 This comment duplicates Comment 130-16. See the response to that comment.

130-57 See MR-10: Changes to Community Character and MR-9: Light Rail Security, as well as response to Comments 130-6 to 130-16 and 130-46 to 130-56.

130-58 This comment duplicates Comment 130-30. See the response to that comment.

130-59 This comment duplicates Comment 130-31. See the response to that comment.

130-60 This comment duplicates Comment 130-33. See the response to that comment, as well as MR-11: Traffic Delay and Level-of-Service.

130-61 This comment duplicates Comment130-34. See the response to that comment.

130-62 This comment duplicates Comment130-23. See the response to that comment.

130-63 The comment duplicates a portion of Comment 130-15. See the response to that comment.

130-64 See response to Comment 130-7, which discusses the applicability of the analysis in two documents (the 2019 South Bay Galleria EIR and a Ninyo & Moore study) to the analysis in the Draft EIR.

130-65 This comment duplicates Comments 130-18 and 130-20. See the responses to those comments.

130-66 This comment duplicates a portion of Comment 130-21. See the response to that comment, as well as MR-8: Light Rail and Freight Train Safety.

130-67 This comment duplicates a portion of Comment 130-24. See the response to that comment. The discussion contained therein would similarly apply to the Draft EIR's analysis and conclusion of the potential for the Hawthorne Option to result in potential impacts to protected wildlife species.

130-68 This comment duplicates Comment 130-25. See the response to that comment.

130-69 This comment duplicates Comment 130-26. See the response to that comment.

130-70 This comment duplicates Comment 130-27. See the response to that comment.

130-71 This comment duplicates Comment 130-28. See the response to that comment.

130-72 This comment duplicates Comment 130-35. See the response to that comment.

130-73 The City submitted Comments 130-73 to 130-86 on Holly Osborne's behalf.

The project is designed to fit within the Metro ROW, including in areas where the Metro ROW narrows to 75 feet, and avoid displacement of residents. Regarding utilities, Metro has identified the locations of pipelines within the Metro ROW, using as-builts plans provided by the utility owners. Although the exact locations are not depicted on figures in the Draft EIR due to the sensitive nature of the information, they have been accounted for in the project's conceptual design and Metro would continue to coordinate with utility owners during the next phases of design. The transition of the Metro ROW from 100 feet to 75 feet has been considered in the project design to ensure compatibility with the inclusion of three sets of tracks and existing utilities without displacing residents. Further refinement of the project design, including detailed engineering, would continue during the final design phase to continue to ensure the project fits within the existing Metro ROW. It is expected that the project and associated relocations could be accommodated within the existing Metro ROW, with the exact configuration, including any needed design variances, to be determined as design advances with safety as the key priority.

130-74 The cross-sections are intended to illustrate the approximate configuration of major project elements, and the exact widths would vary slightly along the alignment. However, the location of the light rail guideway and freight track as depicted in the cross-section as accurate for the Draft EIR, with the freight track shifting up to 14 feet to the west in this segment. In Chapter 2, Description of the Locally Preferred Alternative, of this Final EIR, a version of this cross section at a specific point was updated to reflect the design of the LPA. As included in the notes accompanying all cross-sections within Chapter 2, Project Description, of the Draft EIR, the dimensions of project elements are preliminary and are subject to confirmation in future phases of design. Metro has prepared a property boundary survey to confirm boundary lines of the ROW in the project area. The findings of this survey

are reflected in Appendix B, Select Advanced Conceptual Engineering Drawings – Locally Preferred Alternative, of the Final EIR.

130-75 The proposed multi-use recreational path is planned to be approximately 20 feet wide, accommodating both pedestrians and cyclists. The exact design, including the allocation of space for the bike and pedestrian path, landscaping, and lighting, would be determined in the next phase of design in coordination with local jurisdictions. Metro is committed to ensuring the path is safe, functional, and meets community needs while maintaining compatibility with the available space. More specific details of the proposed multi-use recreational path, such as the placement and type of trees or other landscaping features, would be carefully evaluated to balance shade, aesthetics, and usability of the path.

130-76 As noted in the comment, the freight track would remain in its existing location from south of 172nd Street to Artesia Boulevard, approximately 25 feet from the edge of the Metro ROW, and at 170th Street, the freight track would be shifted approximately three feet to the west. Note that the Draft EIR cross-sections are intended to depict typical configurations of the project, and cannot represent every scenario along the alignment, as the exact track placement varies throughout the corridor. There is adequate space within the Metro ROW to accommodate all relocated utilities within the corridor without displacing residents. It is expected that the project and associated relocations could be accommodated within the existing Metro ROW, with the exact configuration, including any needed design variances, to be determined as design advances with safety as the key priority. Since the publication of the Draft EIR, Metro has completed a property boundary survey. The ROW dimensions are illustrated in Chapter 2, Description of the Locally Preferred Alternative and shown in Appendix B, Select Advanced Conceptual Engineering Drawings - LPA, of the Final EIR, for more detailed cross-sections and plans.

130-77 The distance between the light rail tracks and freight track in the area between 172nd Street and Artesia Boulevard is similar to the design further north. At 172nd Street, the light rail tracks would be shifted slightly to the east, compared to the segment at 170th Street, to maintain adequate separation of the freight tracks and alignment with the bridge. Based on the current stage of design, maintenance access in this area is adequate to accommodate necessary operational and safety needs. It is expected that the project and associated relocations could be accommodated within the existing Metro ROW, with the exact configuration, including any needed design variances, to be determined as design advances with safety as the key priority.

130-78 The commenter refers to BNSF Railway's "Utility Accommodation Policy," which applies to pipelines located on property under the jurisdiction of BNSF. As noted in the policy, its provisions only apply "within the property under the jurisdiction of BNSF" (see page 2-1 of the "Utility Accommodation Policy"). BNSF does not own the Metro ROW in this section of the rail corridor; it only has operating rights on the tracks. Therefore, the provisions outlined in the BNSF policy do not apply in this segment of the corridor. Metro would coordinate with BNSF and utility owners on the layout of all pipeline relocations and protections in place are designed and constructed to ensure safety. See MR-7: Utility Relocation and Hazardous Materials Safety.

130-79 The commenter references the 2003 policy paper "Shared-Use Corridors: Survey of Current Practices and Recommendations for the Future," which states that a separation distance of 25 feet is "normally desired" by the FRA. However, the paper also acknowledges that many

existing freight corridors do not provide room for such a distance, with track centers in some shared-use corridors as close as 13 feet, often without fencing. Although the separation distance between the project alignment and BNSF tracks has not yet been finalized, the distance between project alignment and freight tracks would exceed the aforementioned 13-foot separation observed in other shared-use corridors. The project alignment would also allow for sufficient space for an intrusion detection barrier, and the new light rail tracks would be either elevated or enclosed in a trench along portions of the alignment. Since the paper's 2003 publication, new rules and regulations governing rail safety have been adopted, including the Rail Safety Improvement Act of 2008 and associated regulations, as well as requirements for positive train control (PTC) systems, which use advanced safety technology to automatically control train movements to prevent accidents and improve overall safety. It is expected that the project and associated relocations could be accommodated within the existing Metro ROW, with the exact configuration, including any needed design variances, to be determined as design advances with safety as the key priority. See MR-8: Light Rail and Freight Train Safety.

130-80 The comment requested a sketch of the area immediately south of Artesia Boulevard. The plans and cross-sections included in the Draft EIR represent the conceptual design at the time of publication, which remains sufficient for the environmental analysis. Metro published the 2023 Urban Design Report, which provides additional design details, including cross-sections and renderings to illustrate the project's layout in the corridor. Metro has provided a section of the segment of the Metro ROW between Artesia Boulevard and Grant Avenue in Chapter 2, Description of the Locally Preferred Alternative, of the Final EIR (Figure 2.3-8), and Appendix B, Select Advanced Conceptual Engineering Drawings – Locally Preferred Alternative, which clarifies that the Metro ROW is 100 feet wide. Metro would continue to refine the project design during later engineering phases, and additional materials may be developed at that stage.

130-81 Figure 2.3-6 of the Draft EIR shows a view that is south of Artesia Boulevard as the tracks approach Grant Avenue. In response to this comment, the caption of this figure has been revised in Section 4.3, Corrections and Additions, of the Final EIR. This revision does not change the conclusions of the Draft EIR.

The configuration of the tracks near Grant Avenue reflects the spatial adjustments needed to transition to the Redondo Beach Transit Center Station, located 840 feet south of Grant Avenue from the centerline of the station to the centerline of the roadway. The track separation increases in this area to accommodate the station platform and related infrastructure. The steep embankment referenced by the commenter is outside the light rail guideway and is not part of the operational design. Access from adjacent properties to the Metro ROW would be restricted as part of the project's safety measures.

130-82 Section 3.9, Hazards and Hazardous Materials, of the Draft EIR, describes soil excavation and fill. It is anticipated that the majority of soil excavated would be reused on-site for fill.

130-83 Maintenance access, as shown in Figure 2.3-6 of the Draft EIR, would be within the Metro ROW, to which the "easement/maintenance access" label was intended to refer. The area shown in Figure 2.3-6 was not intended to suggest the appropriation of private property or the creation of a new easement on the homeowners' backyards. Figure 2.3-6 has been revised in Section 4.3, Corrections and Additions, of the Final EIR to remove the "Easement."

Utilities would be located underground within the Metro ROW, and the surface area would also be used for maintenance access.

130-84 The height of the retained fill varies throughout the project corridor, depending on the specific location and design requirements. In the area shown in the referenced cross-section Figure 2.3-6 from the Draft EIR, the height of the retaining wall would be approximately 15 feet, which is consistent with the height of the existing freight track, as measured from the ground level of the houses.

130-85 Repeating the analysis for the Trench Option is not necessary because the Draft EIR already includes a full evaluation of the Trench Option. Based on preliminary designs, the Trench Option is feasible, including with respect to accommodating utilities, freight operations, and the light rail tracks within the existing Metro ROW, while ensuring that safety and operational standards are met.

130-86 Since the publication of the Draft EIR, Metro has completed a property boundary survey. Section 4.3, Corrections and Additions, of the Final EIR, contains some revised cross-sections for Chapter 2, Project Description, of the Draft EIR. These revisions do not change the conclusions of the Draft EIR.

130-87 The City has submitted Comments 130-87 to 130-89 on Niki Negrete-Mitchell's behalf.

The comment does not address the adequacy of the Draft EIR. Section 3.4-4.2, Air Quality, of the Draft EIR evaluates the potential for the project to result in a cumulatively considerable net increase of any criteria pollutant for which the project region is in non-attainment under an applicable federal or state ambient air quality standard. See the analyses and conclusions therein, as well as MR-4: Potential Negative Health Effects Related to Noise, Vibration, and Air Quality.

130-88 See response to Comment 130-23.

128-89 See MR-7: Utility Relocation and Hazardous Materials Safety and MR-8: Light Rail and Freight Train Safety.

130-90 The City has submitted comments on Mark Nelson's behalf, which are duplicative of Submission 1970 (which Mark Nelson submitted separately to Metro). See responses to Comments 1970-1 through 1970-17.

130-91 See response to Comment 130-90.

130-92 See response to Comment 130-90.

130-93 See response to Comment 130-90.

130-94 See response to Comment 130-90.

130-95 See response to Comment 130-90.

130-96 See response to Comment 130-90.

130-97 See response to Comment 130-90.

130-98 See response to Comment 130-90.

130-99 See response to Comment 130-90.

130-100 See response to Comment 130-90.

130-101 See response to Comment 130-90.

130-102 See response to Comment 130-90.

130-103 See response to Comment 130-90.

130-104 See response to Comment 130-90.

130-105 See response to Comment 130-90.

130-106 See response to Comment 130-90.

130-107 See response to Comment 130-90.

130-108 The City has submitted comments on Kevin Mitchell's behalf, which are duplicative of submission 122 (which Kevin Mitchell submitted separately to Metro). See responses to Comments 122-1 through 122-6.

130-109 See response to Comment 130-108.

130-110 See response to Comment 130-108.

130-111 See response to Comment 130-108.

130-112 See response to Comment 130-108.

130-113 See response to Comment 130-108.

130-114 The City has submitted the comment on Kevin Mitchell's behalf. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

130-115 The City has submitted Comments 130-115 and 130-116 on behalf of Nancy Skiba.

While the Blue Zones Initiative is not a regional plan as defined by CEQA Guidelines Section 15125(d), the underlying concerns regarding long-term health effects of environmental stressors such as noise are acknowledged. Section 3.6, Noise and Vibration, of the Draft EIR evaluates construction and operational noise and vibration impacts in accordance with FTA guidance. This guidance is widely accepted for assessing noise and vibration impacts of transit and includes thresholds intended to protect quality of life and avoid adverse effects to sensitive receptors, which include preventing conditions like sleep disturbance and annoyance.

See MR-4: Potential Negative Health Effects Related to Noise, Vibration, and Air Quality.

130-116 See response to comment 130-115. The City's opposition to the Metro ROW alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

130-117 The City has submitted Comments 130-117 to 130-130 on behalf of Niki Negrete-Mitchell.

The screenshots from the Ninyo & Moore study are noted. All comments have been shared with the Metro Board for their consideration. See response to Comment 130-7, which discusses the applicability of the analysis of the Ninyo & Moore study to the analysis in the Draft EIR, as well as MR-13: Soil Stability and Sinkholes.

130-118 The image of the owl is noted. All comments have been shared with the Metro Board for their consideration. See Section 3.7, Biological Resources, of the Draft EIR, which includes an

evaluation of potential impacts to protected wildlife species, including protected birds and raptors.

130-119 See response to Comment 130-7, which discusses the applicability of the analysis of the Ninyo & Moore study to the analysis in the Draft EIR, as well as MR-13: Soil Stability and Sinkholes.

130-120 See MR-13: Soil Stability and Sinkholes.

130-121 The commenter seems to be referring to the sinkhole reportedly caused by a broken irrigation line in a homeowner's lawn. See response to Comment 130-4, which addresses this sinkhole. See also MR-13: Soil Stability and Sinkholes.

130-122 A Quiet Zone reduces freight noise by eliminating routine freight horn noise. As described in Section 2.3-1.3 of the Draft EIR, a Quiet Zone could be established when substantial safety measures are installed to mitigate the increased risks associated with eliminating the use of train horns. These measures typically include vehicle and pedestrian gates, lights and bells, and Americans with Disabilities Act (ADA) compliant sidewalks and ramps. The project includes the installation of these safety features at the freight at-grade crossings as part of the project design. By incorporating these improvements, the project would enable the local jurisdictions to apply for and establish a Quiet Zone in accordance with federal requirements. In this way, the project supports the potential elimination of freight horn noise at these crossings. Additional project features and mitigation measures, such as MM-NOI-2: Soundwalls and MM-NOI-3: Low Impact Frogs, would further reduce noise from freight and light rail operations. See MR-3: Operational Noise Project Features and Mitigation Measures.

130-123 Noise monitoring locations are shown in Figure 3.6-7 and Figure 3.6-8 of the Draft EIR. Metro conducted noise measurements at multiple locations, including locations 17 and 18 on Condon Avenue, south of Artesia Boulevard (which is representative of ambient noise-level conditions on Ruxton Avenue), and location 23, south of 182nd Street at Ralston Lane and Firmona Avenue (which is representative of conditions south of 182nd Street on Firmona Avenue, Fisk Lane, Fisk Court, and Spreckles Court). Regarding the Draft EIR's identification of the residence at 4549 186th Street in Table 3.6-11 (location 24), the address is correctly identified as Redondo Beach.

130-124 See response to Comment 130-23.

130-125 See responses to Comments 130-23 and 130-24.

130-126 Beginning on page 3.1-16, Section 3.1, Transportation, of the Draft EIR, indicates the significant number and routing of bus services and stops at the planned South Bay Galleria Station. Also see Figure 3.1-4 of the Draft EIR, which depicts the Hawthorne Option study area base year transit lines. Additionally, the 2023 Transportation Detail Report, published concurrently with the Draft EIR, includes an analysis of non-CEQA transportation effects, addresses probable transit rerouting that could occur under each of the project alignments. Nonetheless, it is not a commitment for Metro or its partner transit agencies to operate precisely those services, as discussed in the report.

130-127 The comment suggests clarifying the connectivity between the proposed South Bay Galleria Station and the Redondo Beach Transit Center. Although the Draft EIR does not characterize travel between these two locations as "rare," it does evaluate existing and planned transit service in the area, including the multiple bus routes that currently serve the South Bay

Galleria Station. As described in Section 3.1, Transportation, of the Draft EIR (beginning on page 3.1-16) and illustrated in Figure 3.1-4, the bus stops on Artesia Boulevard and Hawthorne Boulevard near the Galleria are relatively high ridership and transfer stops with regional and local connections, including routes that stop on Artesia Boulevard and connect to the Redondo Beach Transit Center. See the 2023 Ridership Summary Report, published concurrently with the Draft EIR, for more information on projected ridership for the project. From a CEQA standpoint, the relevant question is whether the project would conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities (see CEQA Guidelines Appendix G, Section XVII, question 'a'). As analyzed in Sections 3.1-4.1.1 and 3.1-4.1.2 of the Draft EIR, the project would not interfere with existing bus service or prevent future service expansion. No changes to the Draft EIR are necessary in response to this comment, but the information provided is consistent with Metro's understanding that riders would continue to have convenient transit connections between the proposed stations and surrounding destinations, including the Redondo Beach Transit Center.

130-128 The conceptual design in the Draft EIR for the proposed station on Hawthorne Boulevard includes pedestrian access and safety elements, including proposed crosswalks to access the station.

130-129 The commenter appears to be clarifying that the Torrance Transit Center is already served by a City-operated shuttle to the Del Amo Fashion Center, and that additional connectivity could be made via several southbound bus routes. The Draft EIR notes that the project is intended to improve regional rail transit access, with connectivity to surrounding nearby destinations via many local bus routes, such as the Del Amo Fashion Center. All comments have been shared with the Metro Board for their consideration.

130-130 The comment is an excerpt from the Ninyo & Moore study that was referred to in Comment 130-117. See response to Comment 130-7, which discusses the applicability of the analysis of the Ninyo & Moore study to the analysis in the Draft EIR. Also see MR-13: Soil Stability and Sinkholes.

130-131 The City has included Comments 130-131 through 130-154 as part of its March 22, 2023 submittal on the Draft EIR. However, Comments 130-31 through 130-54 consist of remarks dated May 17, 2022, which predate the public review period of the Draft EIR (January 26 to March 27, 2023). The City's pre-Draft-EIR support for the Hawthorne Option is noted in the record. All comments have been shared with the Metro Board for their consideration.

130-132 The comment predates the public review period of the Draft EIR. See response to Comment 130-3 and MR-1: Selection of Alternatives.

130-133 The comment predates the public review period of the Draft EIR. See response to Comment 130-3 and MR-1: Selection of Alternatives.

130-134 The comment predates the public review period of the Draft EIR. Section 3.6, Noise and Vibration, of the Draft EIR, analyzes potential impacts related to noise and vibration and identifies mitigation measures to reduce impacts. See response to Comment 130-4, MR-1: Selection of Alternatives, MR-8: Light Rail and Freight Train Safety, and MR-9: Light Rail Security.

130-135 The comment predates the public review period of the Draft EIR. See response to Comment 130-4 and MR-13: Soil Stability and Sinkholes.

130-136 The comment predates the public review period of the Draft EIR. Based on conceptual design, Metro anticipates that the retaining wall at this location would be approximately 15 feet tall, which is consistent with the height of the existing freight track as measured from the ground level of the houses. The retaining wall is necessary to accommodate the grade changes and ensure the safe operation of the proposed light rail transit. Potential noise and vibration impacts from the light rail are analyzed in Section 3.6, Noise and Vibration, of the Draft EIR. Potential air quality impacts are evaluated in Section 3.4, Air Quality, of the Draft EIR. With respect to potential shading, the creation of shade on private property, such as reduced sunlight in private yards, is generally not considered a significant environmental impact unless it affects public spaces or public resources such as parks, open space, or solar access. In addition, because the position of the sun changes throughout the day and year, any shading from the project features would be temporary and vary in duration, rather than causing continuous loss of light. Furthermore, the scale of retaining walls and soundwalls would generally be similar to the surrounding environment, and would therefore not generally be a substantial introduction of shade. Accordingly, shading of individual residences would not constitute a significant impact.

130-137 The comment predates the public review period of the Draft EIR. The City's opposition to the Metro ROW alignment is noted. All comments have been shared with the Metro Board for their consideration. All potential impacts required for analysis under CEQA, including those to the residences along the Metro ROW, are evaluated in the Draft EIR.

130-138 The comment predates the public review period of the Draft EIR. Metro acknowledges the Hawthorne Option would have higher ridership than the Metro ROW alignments. Metro analyzed ridership benefits in relation to construction cost (see May 2024 Metro Board Report) and found that the Hawthorne Option was less cost effective than the LPA. See MR-1: Selection of Alternatives.

130-139 The comment predates the public review period of the Draft EIR. See response to Comment 130-3, as well as MR-1: Selection of Alternatives for information concerning the Metro Board's selection of the LPA.

130-140 The comment predates the public review period of the Draft EIR. The Draft EIR addresses concerns related to oil pipelines in Section 3.9, Hazards and Hazardous Materials, and Section 3.11, Utilities and Service Systems, of the Draft EIR. See MR-7: Utility Relocation and Hazardous Materials Safety.

130-141 The comment predates the public review period of the Draft EIR. See MR-21: Cost Estimates and Schedule.

130-142 The comment predates the public review period of the Draft EIR. The Draft EIR evaluates the potential for the project alignments to create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials in Section 3.9, Hazards and Hazardous Materials, of the Draft EIR. See the analysis and conclusions contained therein. See MR-7: Utility Relocation and Hazardous Materials Safety and MR-13: Soil Stability and Sinkholes.

130-143 The comment predates the public review period of the Draft EIR. Section 3.6, Noise and Vibration, of the Draft EIR, addresses noise and vibration due to construction and operation.

130-144 The comment predates the public review period of the Draft EIR. Metro values community engagement and appreciates the participation of local officials and residents in discussions

about the project. Feedback from community meetings is an essential part of the planning process and the feedback received during the 2022 community events for the project helped inform Metro's approach to project development, including design options, as well as the analysis in the Draft EIR. Metro has designed the tracks to minimize potential impacts to adjacent land uses. The re-alignment of the freight tracks within the Metro ROW is necessary to accommodate the light rail tracks. Mitigation measures are proposed in the Draft EIR where necessary to address potential impacts, including those related to noise and vibration during project construction and operation, as well as those related to air quality during construction. See MR-3: Operational Noise Project Features and Mitigation Measures, MR-4: Potential Negative Health Effects Related to Noise, Vibration, and Air Quality and MR-8: Light Rail and Freight Track Safety.

130-145 The comment predates the public review period of the Draft EIR. See MR-5: Vibration Impact Types and Impact Thresholds, MR-6: Vibration Analysis During Final Design, MR-8: Light Rail and Freight Train Safety, and MR-13: Soil Stability and Sinkholes. The LPA would avoid shifting freight closer to the residential developments referenced in the comment.

130-146 The comment predates the public review period of the Draft EIR. Section 3.6-2.4, Noise and Vibration, of the Draft EIR presents the significance criteria used for the noise and vibration analysis. See MR-2: Operational Noise Analysis Methodology and Impact Thresholds and MR-5: Vibration Impact Types and Impact Thresholds.

130-147 The comment predates the public review period of the Draft EIR. The Draft EIR establishes a range of mitigation measures to address potential noise impacts during both project construction and operation. As described in Section 3.6, Noise and Vibration, of the Draft EIR, Mitigation Measures MM-NOI-2: Soundwalls and MM-NOI-3: Low Impact Frogs would reduce noise impacts associated with light rail operations, and MM-NOI-4: Quiet Zone Establishment (for the Metro ROW alignments) would address combined light rail and freight operational impacts. With implementation of the foregoing mitigation measures, only the Elevated/At-Grade Alignment with at-grade crossings would result in a significant and unavoidable operational noise impact. With implementation of these same mitigation measures, the LPA would result in a less-than significant operational impact. During construction, noise impacts would be minimized through the implementation of a Noise Control Plan as part of Mitigation Measure MM-NOI-1: Noise Control Plan, which includes the use of noise-reducing devices on construction equipment, noise barriers, and adherence to local noise ordinances.

Sound proofing homes to minimize construction noise has been carefully considered. However, this approach is not considered feasible or appropriate for the following reasons:

> Construction noise is temporary and mobile: Construction would occur in phases along the project alignment over a multi-year period, and no single home would experience intense noise for the full construction duration. Rather, heavy construction activity would be localized to a given block or segment for limited durations, with quieter finishing work occurring thereafter. Retrofitting homes for such temporary, localized impacts is not a proportionate or effective mitigation strategy.

> Retrofitting is not an effective approach for exterior noise: Construction and operational noise is measured and assessed using exterior noise criteria, and the

most effective mitigation is achieved by reducing noise at the source (e.g., through equipment selection, barriers, and site management). Soundproofing interior spaces, such as replacing windows or adding wall insulation, does not address outdoor noise levels and may not be effective unless doors, ventilation, and other openings are also sealed.

> Interior ventilation could be impaired. For acoustic retrofitting to meaningfully reduce noise levels, windows would need to remain closed, which may conflict with ventilation and air quality needs protected under buildings and preferred by some residents. If windows remained open, the intended goal of reducing noise impacts to sensitive receptors would not be achieved as desired, reducing the effectiveness of the mitigation measure.

> Retrofitting would require extensive coordination and participation: Implementing an acoustic retrofitting program would require sending formal offers to hundreds of property owners and tenants, negotiating liability and access terms, and coordinating multiple in-unit site visits for testing, construction, and post-construction verification. Many tenants would likely be unresponsive or unwilling to permit construction inside their homes, particularly given the disruptions and potential impacts to the buildings, such as interference with existing waterproofing.

> Retrofit measures are logistically and financially infeasible on a broad scale: Installing replacement windows or conducting individualized building modifications would require property-by-property assessments of building construction type, existing window conditions, occupancy status, and owner consent. To be effective, each unit would need to be analyzed based on building age, construction type, orientation, and existing conditions. It would also require coordination with contractors, temporary relocation in some cases, and follow-up inspections. These efforts would be disproportionately burdensome relative to the temporary nature of the impact. Further, given the scale, complexity, and potential for low participation, such a program would be unlikely to be completed within a reasonable timeframe.

> Retrofit measures may introduce secondary impacts: Construction work to install new windows or insulation, particularly if done on an expedited basis in an occupied home, could itself create disruptions, such as noise, dust, and temporary loss of access. In many cases, these impacts could exceed or compound the temporary construction noise the retrofit is intended to mitigate.

For these reasons, retrofitting of homes is not proposed as a feasible mitigation measure for construction (or operational) noise impacts. Such a measure would be of uncertain effectiveness for the reasons described above and therefore would not constitute appropriate mitigation under CEQA. Metro could not force tenants and homeowners to participate in such a program, further limiting the measure's ability to meaningfully reduce the impact it is intended to address. Instead, the project would implement proactive measures that reduce noise at the source, which are enforceable through the Noise Control Plan, and are applicable across the entire project corridor.

130-148 The comment predates the public review period of the Draft EIR. Section 3.6, Noise and Vibration, of the Draft EIR assesses freight operations at the proposed relocated freight track locations, in accordance with the FTA Transit Noise and Vibration Assessment Manual (2018). Changes in freight noise level would vary depending on the location of receptors. Sensitive receptors on the west side of the Metro ROW would experience marginally greater freight noise due to the shift in freight tracks closer to these receptors, while receptors on the east side of the Metro ROW may experience a slight decrease in freight noise. Overall, freight noise is anticipated to be reduced compared to existing conditions with implementation of Project Feature PF-NV-1: Quiet Zone Equipment Installation and Mitigation Measure MM-NOI-4: Quiet Zone Establishment. See MR-2: Operational Noise Analysis Methodology and Impact Thresholds and MR-3: Operational Noise Project Features and Mitigation Measures.

130-149 The comment predates the public review period of the Draft EIR. See MR-8: Light Rail and Freight Train Safety.

130-150 The comment predates the public review period of the Draft EIR. Emergency access is addressed in Section 3.1, Transportation, of the Draft EIR, beginning on page 3.1-42 and includes average emergency response times, if available. Emergency response agencies, which have been notified of the project, are responsible for setting and maintaining their own standards for response times with respect to changing conditions, including, but not limited to, construction projects in the area. See MR-12: Emergency Access.

130-151 The comment predates the public review period of the Draft. As noted in Section 3.9, Hazards and Hazardous Materials, of the Draft EIR, as required by Project Feature PF-GEO-1: Metro Geotechnical Design Standards, site-specific geotechnical investigations would be performed to characterize the soil types and their suitability for the construction of the project. Based on these investigations, appropriate geotechnical design recommendations would be developed, including measures to ensure that the retaining wall structures are capable of supporting the weight of freight trains operating at grade adjacent to the below-grade alignment. These recommendations would include strategies to prevent soil subsidence, such as soil stabilization, retaining wall reinforcement, and other engineered solutions informed by field exploration, laboratory testing, and engineering analyses. See MR-13: Soil Stability and Sinkholes.

130-152 The comment predates the public review period of the Draft EIR. Regarding berms for the relocated freight lines, according to the Appendix 2-A, Select Advanced Conceptual Engineering Drawings, of the Draft EIR, the centerline of the realigned freight tracks north of Artesia Boulevard would be more than 20 feet from the western boundary of the Metro ROW. Thus, berms for the realigned freight tracks would be farther than five feet of private properties.

The design includes retaining walls as needed to stabilize berms and ensure proper drainage. These retaining walls would incorporate drainage systems to manage runoff and prevent water accumulation near private property. To address noise impacts, soundwalls would be installed where significant noise impacts have been identified per MM-NOI-2: Soundwalls, typically along both sides of the Metro ROW. These soundwalls are designed to reduce noise levels to meet FTA noise criteria for residential properties. Similarly, vibration mitigation measures include MM-VIB-4: Low Impact Frogs, MM-VIB-5: Resilient Fasteners, and MM-VIB-6: Ballast Mats to reduce operational vibration to below the FTA vibration

criteria. Together, these measures would ensure the project design minimizes noise and vibration, maintains stability, and accommodates proper drainage. See MR-3: Operational Noise Project Features and Mitigation Measures.

130-153 The comment predates the public review period of the Draft EIR and, thus, does not address the adequacy of the Draft EIR. Chapter 2, Project Description, of the Draft EIR describes the multi-use recreational paths that would be included within each alignment option. A path would be included in Redondo Beach, between Grant Avenue and 182nd Street, which would connect to the Redondo Beach TC Station.

130-154 The comment predates the public review period of the Draft EIR and, thus, does not address the adequacy of the Draft EIR. See response to Comment 130-51 and MR-13: Soil Stability and Sinkholes.

130-155 The City has included Comments 130-155 through 130-167 as part of its March 22, 2023 submittal on the Draft EIR; however, Comments 130-55 through 130-67 consist of the City's March 16, 2021 letter providing input on the scope of the Draft EIR in response to Metro's Notice of Preparation of the Draft EIR. Appendix 1-A, Notice of Preparation/Scoping Summary, of the Draft EIR provides a summary of the scoping process, including the City of Redondo Beach's feedback.

130-156 The comment predates the public review period of the Draft EIR. As detailed in Chapter 2, Project Description, of the Draft EIR, the Hawthorne Option is fully elevated. Noise and vibration are addressed in Section 3.6, Noise and Vibration, of the Draft EIR. See MR-8: Light Rail and Freight Train Safety.

See response to Comment 130-155 and MR-1: Selection of Alternatives. All comments have been shared with the Metro Board for their consideration.

130-157 The comment predates the public review period of the Draft EIR. See response to Comment 130-155, as well as MR-1: Selection of Alternatives and MR-10: Changes to Community Character.

130-158 The comment predates the public review period of the Draft EIR. See response to Comment 130-155. The Trench Option evaluated in the Draft EIR consists of a trench alignment along the Metro ROW including under 182nd Street, as described in Chapter 2, Project Description, of the Draft EIR, specifically in Section 2.3-2. Chapter 3, Affected Environment and Environmental Impact Analyses, of the Draft EIR includes an assessment of potential environmental impacts that would result from the Trench Option.

130-159 The comment predates the public review period of the Draft EIR and, thus, does not address the adequacy of the Draft EIR. See response to Comment 130-155, as well as MR-7: Utility Relocation and Hazardous Materials Safety.

130-160 The comment predates the public review period of the Draft EIR and, thus, does not address the adequacy of the Draft EIR. Noise-level increases due to project construction and operation are evaluated in Section 3.6, Noise and Vibration, of the Draft EIR. See responses to Comments 130-155 and 130-15, as well as MR-2: Operational Noise Analysis Methodology and Impact Thresholds, MR-3: Operational Noise Project Features and Mitigation Measures, MR-4: Potential Negative Health Effects Related to Noise, Vibration,

and Air Quality, MR-10: Changes to Community Character, and MR-14: Property Values and Impacts to Businesses.

130-161 The comment predates the public review period of the Draft EIR and, thus, does not address the adequacy of the Draft EIR. See response to Comment 130-155. Loss of parking is not considered an environmental impact under CEQA; nonetheless, the 2023 Transportation Detail Report, published concurrently with the Draft EIR, includes information on parking changes related to the project. Parking at the existing Redondo Beach (Marine) Station and Redondo Beach Transit Station would be maintained.

130-162 The comment predates the public review period of the Draft EIR and, thus, does not address the adequacy of the Draft EIR. Section 3.15, Public Services, of the Draft EIR evaluates the potential for the project alignments to result in substantial adverse physical impacts associated with the provision of or need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, to maintain acceptable service ratios, response times, and other performance objectives. See the analyses and conclusions therein. Also see response to Comment 130-155, as well as MR-9: Light Rail Security.

130-163 The comment predates the public review period of the Draft EIR and, thus, does not address the adequacy of the Draft EIR. See response to Comments 130-155, 130-3, and 130-136.

130-164 The comment predates the public review period of the Draft EIR and, thus, does not address the adequacy of the Draft EIR. Section 3.1 of the Draft EIR evaluates transportation impacts to pedestrian and bicycle facilities and safety, including consideration for nearby schools, pedestrian facilities, and the need for safe crossings. As discussed therein, the project would improve safety at existing railroad crossings by incorporating advanced safety features that exceed the warning devices currently used for the freight rail line. See response to Comment 130-55 and MR-10: Changes to Community Character.

130-165 The comment predates the public review period of the Draft EIR and, thus, does not address the adequacy of the Draft EIR. See response to Comment 130-155. Public roads are maintained by the relevant city, the county, or the state (Caltrans) and are periodically rehabilitated to address wear and tear. Where construction activity would require the removal or alteration of portions of the roadway or other transportation facilities, Metro would restore the affected areas to their original or better condition, or to an improved configuration, as described in Section 2.3 of the Draft EIR.

130-166 The comment predates the public review period of the Draft EIR and, thus, does not address the adequacy of the Draft EIR. See response to Comment 130-155. As described in Section 3.3, Aesthetics, of the Draft EIR, in accordance with Project Feature PF-AES-2: Metro Design Standards, all project components would be designed in accordance with the Metro Rail Design Criteria and the objectives of the Metro Art Program Policy. Metro would continue to coordinate with the City of Redondo Beach with respect to public art planning and design in the next phase of design, pending project approval by the Metro Board.

130-167 The comment predates the public review period of the Draft EIR and, thus, does not address the adequacy of the Draft EIR. See response to Comment 130-155. Section 3.2, Land Use and Planning, of the Draft EIR reviews relevant land use planning documents. The City of Redondo Beach's General Plan and Zoning Ordinance are shown on pages 3.2-4 through 3.2-5, in Table 3.2-3 of the Draft EIR. The project's consistency with the City of Redondo Beach General Plan is described on page 3.2-27 of Table 3.2-5 of the Draft EIR.

130-168 The City has included Comments 130-168 through 130-175 as part of its March 22, 2023 submittal on the Draft EIR; however, Comments 130-168 through 130-175 consist of the City's July 18, 2018 letter on the Supplemental Alternatives Analysis. The comments predate the public review period of the Draft EIR (January 26 to March 27, 2023) and, thus, do not address the adequacy of the Draft EIR.

Metro has considered the City's requests as part its preparation of the Draft EIR. The Hybrid Alternative has been selected as the LPA. See MR-1: Selection of Alternatives.

130-169 The comment predates the public review period of the Draft EIR. See response to Comment 130-168. The project would not be subject to the City's Planning Commission Design Review, but Metro would continue to coordinate with the City in future phases of design, including providing opportunities to review station design and access plans.

130-170 The comment predates the public review period of the Draft EIR. See response to Comment 130-168 and MR-11: Traffic Delay and Level-of-Service. With respect to parking, State law preempts Metro from compliance with local zoning ordinances (*see Rapid Transit Advocates, Inc. v. Southern California Rapid Transit District* (1986) 185 Cal.App.3d 996), including Redondo Beach Municipal Code Section 10-2.1700 et seq. Additionally, CEQA does not require an evaluation of parking capacity and demand. The project would include a surface parking lot at the Torrance TC Station. The project would also include Project Feature PF-T-1: Construction Traffic Management Plan. The CTMPs prepared as part of Project Feature PF-T-1: Construction Traffic Management Plan would consist of several elements, including, but not be limited to, worksite traffic control plans to ensure safe access for pedestrians traveling around parking lanes temporarily closed as part of project construction that would have otherwise been used by said individuals. In addition, the CTMPs would require the construction truck contractor to provide off-site truck staging in a legal area, further preventing construction activities from affecting existing parking locations.

130-171 The comment predates the public review period of the Draft EIR See response to Comment 130-168. Metro would coordinate with the City prior to construction on a Construction Traffic Management Plan (CTMP). As described in Section 3.1, Transportation, of the Draft EIR, on pages 3.1-15 to 3.1-16 (describing Project Feature PF-T-1: Construction Traffic Management Plan), as part of the project, the contractor must develop a CTMP prior to the initiation of localized construction activities. The CTMP would be submitted to the City of Redondo Beach for review.

130-172 The comment predates the public review period of the Draft EIR. See response to Comment 130-168. The Metro ROW is zoned as P-ROW according to the City's zoning ordinance, specifically the category of "railroad". The criteria included in the comment are not applicable. See MR-10: Changes to Community Character for additional information regarding land use planning and consistency.

130-173 The comment predates the public review period of the Draft EIR. See response to Comment 130-168. In the event that Metro pursues the Hawthorne Option, some commercial properties would need to be permanently acquired. However, Metro is not subject to local zoning requirements; therefore, a rezoning entitlement would not be required. See MR-10: Changes to Community Character for more information. Additionally, the project would not be inconsistent in terms of land use, given the properties are industrial and located between

an existing railroad corridor and freeway corridor. Metro has selected the Hybrid Alternative as the LPA. See MR-1: Selection of Alternatives.

130-174 The comment predates the public review period of the Draft EIR See response to Comments 130-168 and 130-169, as well as MR-10: Changes to Community Character.

130-175 The comment predates the public review period of the Draft EIR. Although Metro is not subject to local zoning ordinances, pursuant to Mitigation Measure MM-NOI-1: Construction Noise Control Plan, Metro would obtain a variance from the applicable local jurisdiction when nighttime work is required. Section 4-24.604 of the City of Redondo Beach Noise Ordinance specifies that the provisions cited by the comment do not apply to any activity that is preempted by state or federal law. State law preempts Metro from compliance with the local zoning ordinance (see *Rapid Transit Advocates, Inc. v. Southern California Rapid Transit District* (1986) 185 Cal.App.3d 996). Therefore, the standards cited by the comment do not apply. Also see responses to Comments 130-168 and 130-15, as well as MR-2: Operational Noise Analysis Methodology and Impact Thresholds and MR-3: Operational Noise Project Features and Mitigation Measures.

130-176 This comment duplicates Comment 130-168. See the response to that comment.

Submission 132 Sean Carlson, Metropolitan Water District of Southern California

132-1 Metro acknowledges Metropolitan Water District of Southern California's (Metropolitan) facilities located within and adjacent to the project limits. For reference, utilities are discussed in Section 3.11, Utilities and Service Systems, of the Draft EIR. The design of the project allows all utility owners to maintain access to their facilities. Metro owns most of the underlying railroad corridor, referred to as the Metro right-of-way (ROW), and Metropolitan's facilities require a license to cross Metro-owned portions of the ROW. Any required adjustments to Metropolitan facilities would be subject to the terms and conditions of the current license agreement(s) between Metro and Metropolitan.

132-2 Metro acknowledges Metropolitan's requirement to maintain access to its facilities at all times for maintenance and repairs. Metro would coordinate with Metropolitan throughout future phases of design and prior to construction to ensure the project activities do not conflict with their facilities or access needs. Regarding the West Basin Feeder 45" pipeline located along Manhattan Beach Boulevard, Metro has a license agreement with Metropolitan for an easement where the utility crosses underneath the Metro ROW. On May 23, 2024, the Metro Board selected the Hybrid Alternative as the LPA. The LPA was referred to as the "170th/182nd Grade-Separated Light Rail Transit Alternative" in the Draft EIR. Under the LPA, the light rail track would be on an elevated structure to cross over Manhattan Beach Boulevard. As part of the design refinements reflected in the updated ACE drawings in the Final EIR, Metro has shifted the location of proposed support columns for the elevated light rail structure to avoid placing it within the public roadway. See Figure 4.20-6 in Section 4.21, Corrections and Additions, of the Final EIR, which shows that a support column would not be installed within the Manhattan Beach Boulevard boundaries, and Section 4.25, Corrections and Additions, of the Final EIR, which provides an evaluation of environmental impacts as a result of the LPA design refinements, including the shifted support columns. Also see Appendix B, Select Advanced Conceptual Engineering Drawings - LPA, of the Final EIR. Therefore, the project would not add additional train loads over utilities or require the underground facility to be relocated. Freight trains currently operate over the pipeline at this location. The project would shift the freight tracks slightly to the

west, and the Metropolitan pipeline would be protected-in-place with a casing to ensure that vehicle and train loading would not damage the utility. Vibration-related impacts to underground utilities are not reasonably anticipated. For additional information, see MR-7: Utility Relocation and Hazardous Material Safety.

132-3 Metro acknowledges Metropolitan's offer to provide detailed drawings of its pipelines and right-of-way and would coordinate with the Substructure Team to obtain this information as needed. The current design is based on plan and profile drawings that Metro received from Metropolitan in a letter dated March 17, 2020. Metro would ensure that Metropolitan's facilities are fully shown and identified on all design plans submitted for review. As the project advances into the next design phase (pending project approval by the Metro Board), Metro would share the designs with Metropolitan for review and comment to ensure compatibility with Metropolitan's facilities and easements.

132-4 See response to comment 132-2. The Metropolitan pipeline is located within an easement in the Metro ROW, and Metropolitan's operating rights are governed by a license agreement rather than property rights. No studies or construction, including potholing, are proposed in any Metropolitan property. Metro does not consider Metropolitan a CEQA responsible agency, but would continue to coordinate with Metropolitan as the design progresses.

132-5 Metro actively monitors water use and finding ways to increase conservation efforts. Potable water use has been reduced across the agency by over 34% since 2013 through conservation efforts, system enhancements and efficiency upgrades aligned with Metro's 2010 Water Action Plan. While water conservation and efficiency remain priorities for Metro, water reclamation, reuse and sustainable stormwater management are equally critical components of Metro's water strategy through 2030. Metro targets and commitments related to water reflect the full water cycle, recognizing that the ways in which the agency procures, consumes, processes and disposes of water have regional impacts that could affect both the supply and quality of regional water resources. The Metro Moving Beyond Sustainability – Strategic Plan 2020 outlines a framework of goals, targets, strategies, and actions to organize the measures, programs, and projects related to sustainability. The Plan is organized into topical strategic focus areas, including water quality and conservation. Goals include reducing agency-wide potable water use by 22% from 2018 to 2030. Metro has policies in place to meet this goal by increasing the use of recycled water, planting native and drought-tolerant trees, using weather sensing irrigation controllers, and low-flow sanitary fixtures. Metro is committed to working with regional partners, like Metropolitan, to maximize stormwater capture and recycled water use opportunities.

132-6 The utility information included in the conceptual plans is not intended for final design-level mapping, but rather provides information on the location and general configuration of utilities within the Metro ROW for the purposes of environmental analysis. Although utility easement information was not included with the conceptual drawings, Metro is aware of the easement area, and has records of the license agreement. Metro would continue to identify Metropolitan facilities on relevant drawings as the project advances to the next design phase, which would occur if the Metro Board certifies the Final EIR and approves an alignment for advancement. As specified in project feature Construction Traffic Management Plan PF-US-1: Utility Identification and Coordination, discussed in Section 3.11, Utilities and Services Systems, of the Draft EIR, Metro would coordinate with

Metropolitan and other utility owners throughout the design process to ensure that utilities are properly identified and protected in place to the extent feasible. For additional information, see MR-7: Utility Relocation and Hazardous Materials Safety.

132-7 As specified by Project Feature PF-US-1: Utility Identification and Coordination, Metro will use conversions that are based on information obtained during field survey and utility verification activities to be completed during the next phase of design.

132-8 Metro acknowledges Metropolitan's comment regarding the potential need to relocate its existing pipeline at Manhattan Beach Boulevard under the Trench Option and the need for further evaluation of design criteria to determine the final length, depth, and size of any required adjustments. Metro also acknowledges Metropolitan's note that modifications to its air release and vacuum structures may be necessary if the proposed alignment results in a new high or low point. The LPA would not require the West Basin Feeder pipeline to be relocated. Instead, the pipeline would be protected in place. However, a final decision on the alignment has not been made, and the Trench Option remains under consideration. Should further engineering determination that relocation or modifications to Metropolitan's facilities are necessary under any alignment, Metro would coordinate closely with Metropolitan to assess design solutions and minimize potential conflicts. Utility plans for both relocation and protection in place would be further developed during the next stages of design.

132-9 See response to comment 132-8 regarding relocation of the West Basin Feeder pipeline. Metro is coordinating with Metropolitan on a Cooperative Agreement to address engineering review requirements and financial responsibilities, including cost-sharing arrangements for any necessary utility modifications, pending project approval by the Metro Board.

132-10 Metro would take these schedule constraints into consideration during the development of the next phase of design and would coordinate with Metropolitan regarding scheduling and other considerations that could affect Metropolitan's seasonal requirements.

132-11 Metro would work with Metropolitan during the next design phase and would provide necessary technical information for Metropolitan's review as the designs are developed.

132-12 Site specific geotechnical exploration would be completed as part of the next design phase following Metro Board certification of the Final EIR and approval of an alignment for advancement. Metro would share relevant geotechnical information with Metropolitan once it becomes available to support Metropolitan's evaluation of potential conflicts with their facilities. The cast-in-drilled-hole (CIDH) pile that Metropolitan refers to was developed as part of the conceptual design for the Draft EIR. In response to Metropolitan's concerns and to minimize impacts to utilities within Manhattan Beach Boulevard, Metro has refined the design so that this column would not be required within the roadway for the elevated structure for the Elevated/At-Grade Alignment (analyzed as the Proposed Project in the Draft EIR) or the LPA. A final decision on the alignment has not been made, and should further engineering determination that relocation or modifications to Metropolitan's facilities are necessary under any alignment, Metro would coordinate closely with Metropolitan to assess design solutions and minimize potential conflicts. Utility plans for both relocation and protection in place would be further developed during the next stages of design.

132-13 See response to comment 132-12. More detailed cross-sections would be developed as part of the next design phase and would be shared with Metropolitan once available.

132-14 See response to comment 132-12. Groundwater is discussed in Section 3.10, Hydrology and Water Quality of the Draft EIR. As discussed in Section 3.10-3.5, groundwater depth at the northern end of the project has previously been measured at approximately 24 feet below ground surface (bgs). Sections 3.10-4.1 and 3.10-4.2 state that construction of foundations and columns may require groundwater dewatering during excavation activities. Site specific geotechnical exploration would be conducted as part of the next design phase to identify water table elevations and assess current groundwater conditions. However, groundwater drawdown is not anticipated for CIDH piles as a "wet" construction method is recommended for CIDH pile installations. In this method, the excavation is filled with slurry (or sometimes water) to maintain pressure and prevent collapse or inflow of groundwater during drilling. This approach stabilizes the hole without the need to lower the surrounding groundwater level, thereby minimizing the risk of drawdown-related settlement or impacts to adjacent structures.

132-15 See responses to Comments 132-12 and 132-14 with regards to CIDH pile installation and soils.

132-16 As stated in response to comment 132-2, under the LPA, the light rail track would be on an elevated structure to cross over Manhattan Beach Boulevard, and therefore, the project would not add additional train loads over utilities or require the facility to be relocated. Freight trains currently operate over the pipeline at this location. The project would shift the freight tracks slightly to the west, and the Metropolitan pipeline would be protected-in-place with a casing to ensure that vehicle and train loading would not damage the utility.

132-17 See MR-7: Utility Relocation and Hazardous Materials Safety. Metro acknowledges the importance of protecting existing pipeline infrastructure during construction. As noted in the comment, CIDH piles are proposed to be placed within the Metro ROW outside of Manhattan Beach Boulevard. However, driven piles would not be within 20 feet of the centerline of the pipeline, consistent with the restrictions identified in the comment. During the next phase of design, detailed structural calculations for pile foundations located near the pipeline would be prepared and submitted for review by affected utility owners, as part of Metro's standard coordination protocols. Per Project Feature PF-US-1: Utility Identification and Coordination (see Section 3.11, Utilities, of the Draft EIR), Metro would coordinate directly with utility providers to conduct field verifications, such as potholing, in consultation with the affected utility, to confirm the location and depth of the pipeline prior to construction. Additionally, a settlement and lateral deformation analysis would be conducted for pile installations within proximity to critical utilities, including within the 50-foot range specified in the comment. The evaluations would inform the final design and construction methods to ensure pipeline integrity. As part of standard construction practices, settlement and deformation monitoring would occur, including ground settlement (or heaving) monitoring adjacent to trench walls, fill embankments and any settlement-sensitive utilities or structures. This measure would ensure the protection of nearby pipelines and compliance with the requirements of utility owners.

132-18 See response to comment 132-17 regarding settlement and how Metro would work to prevent it.

132-19 See MR-7: Utility Relocation and Hazardous Materials Safety. Per Project Feature PF-US-1: Utility Identification and Coordination (see Section 3.11, Utilities, of the Draft EIR), Metro would coordinate with utility owners, including Metropolitan, to identify and protect critical infrastructure during design and construction. Field verifications, such as potholing in consultation with the utility owner, would be conducted near foundations for project structures, in order confirm the location and depth of Metropolitan's facilities prior to any excavation. As project design progresses into Preliminary Engineering and construction documentation, Metro would coordinate with Metropolitan to review project elements that may affect its facilities, and Metro would share shoring design information with Metropolitan once the construction documents have been developed. Driven piles are not anticipated to be placed within 20 feet of the centerline of Metropolitan's pipeline. As design advances, Metro would continue to coordinate closely with Metropolitan to ensure that appropriate clearance and protection measures are incorporated, and that excavation does not proceed near sensitive facilities without appropriate review and acceptance.

132-20 Metropolitan's facilities are identified in Appendix 2-A, Select Advanced Conceptual Engineering Drawings of the Draft EIR. As noted in response to comment 132-2, the project design has been refined to avoid direct conflict with the Metropolitan pipeline at Manhattan Beach Boulevard. Metro is committed to ongoing coordination with Metropolitan to ensure that its facilities are protected during construction. Metro would share construction equipment information with Metropolitan once construction documents have been developed. All construction activities near Metropolitan's facilities would be conducted in a manner that prevents excessive vehicle, impact, or vibratory loads, and prevent the imposition of unbalanced loads on the pipeline. Metro would work with Metropolitan to address any project-specific concerns and would implement appropriate protective measures consistent with industry standards and Metropolitan requirements. See MR-7: Utility Relocation and Hazardous Materials Safety.

132-21 Metro does not foresee the need to store equipment and spoils over the Metropolitan facilities, but should the need arise Metro would coordinate with Metropolitan to avoid any conflicts with facilities. Chapter 2, Description of the Locally Preferred Alternative, of the Final EIR includes preliminary staging areas for construction.

132-22 Metro would comply with Metropolitan requirements when constructing the project, including complying with vehicle load requirements over the pipeline.

132-23 Metro would comply with Metropolitan requirements when constructing the project, including not operating vibratory compaction equipment within the required minimum distance from pipelines.

132-24 Metro would contact Metropolitan and request staff contacts once the construction documents have been finalized, including with respect to potholing.

132-25 Metro acknowledges receipt of the returned prints of the drawings. If the Metro Board certifies the Final EIR and approves an alignment for implementation, designs would be developed as part of the phase of work. During that time, Metro would re-review Metropolitan's comments and incorporate necessary revisions where appropriate. Metro would continue to coordinate with Metropolitan to address any design concerns and ensure Metropolitan's feedback is considered in the development of project plans.

Submission 138 Brenda Moun, City of Torrance Traffic Commission

138-1 The City of Torrance Traffic Commission's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

138-2 See MR-11: Traffic Delay and Level-of-Service. See the 2023 Transportation Detail Report, published concurrently with the Draft EIR, for discussion on traffic conditions.

138-3 See response to Comment 138-1.

138-4 See response to Comment 138-1.

138-5 This comment duplicates Comment 138-2. See the response to that comment.

138-6 This comment duplicates Comment 138-1. See the response to that comment.

Submission 356 Mayor William Brand, City of Redondo Beach

356-1 Submission 356 includes the same comments from the City of Redondo Beach as Submission 130. See the responses to comments to Submission 130.

Submission 358 Sean Carlson, Metropolitan Water District of Southern California

358-1 Submission 358 includes the same comments from Metropolitan as Submission 132. See the responses to comments to Submission 132.

Submission 393 Sean Carlson, Metropolitan Water District of Southern California

393-1 Submission 393 includes the same comments from Metropolitan as Submission 132. See the responses to comments to Submission 132.

Submission 424 Erinn Wilson-Olgin, California Department of Fish and Wildlife

424-1 Submission 424 includes the same comments from CDFW as Submission 123. See the responses to comments to Submission 123.

Submission 675 Daren Gilbert, California Public Utilities Commission

675-1 Metro acknowledges the project is subject to the listed rules and regulations.

675-2 Metro acknowledges the design of the project must comply with applicable Commission General Orders. Compliance with the General Orders has been considered throughout the project's conceptual design and would continue to be considered as the design advances. Pending project approval by the Metro Board, Metro would continue to coordinate with the California Public Utilities Commission (CPUC) during the next phases of engineering and design to ensure compliance and obtain any necessary exceptions or approvals for light rail-specific conditions.

675-3 Metro acknowledges the project must comply with federal safety regulations, including 49 C.F.R. Part 674, State Safety Oversight. Metro would maintain close coordination with the CPUC, the designated State Safety Oversight agency, to meet all oversight requirements.

675-4 The Draft EIR, beginning on page 3.1-48, examines the potential for increased hazards, including for pedestrians at the 170th Street and 182nd Street at-grade light rail crossings for the proposed Metro ROW Elevated/At-Grade Alignment. The analysis specifically considers the increased frequency of train (light rail) activity and potential hazards to pedestrians in these areas. The project includes several project features to address hazards at the 170th Street and 182nd Street at-grade crossings, which currently accommodate a single freight track. These upgrades would substantially improve railroad safety for pedestrians and vehicles by incorporating state-of-the art safety devices, including gates designed to prevent pedestrian and vehicle access during train activity and flashing lights and audible warning devices for clear and timely notification of approaching trains. The Draft EIR accordingly concluded that impacts to pedestrian safety would be less than significant without mitigation. On May 23, 2024, the Metro Board selected the Hybrid Alternative as the LPA. The LPA was referred to as the "170th/182nd Grade-Separated Light Rail Transit Alternative" in the Draft EIR and grade separates light rail at 170th and 182nd Street. The CPUC's support for the Trench Option and the Hawthorne Option is noted. All comments have been shared with the Metro Board for their consideration. See MR-8: Light Rail and Freight Train Safety.

The light rail guideway of the LPA, Trench Option, and Hawthorne Option would be fully grade-separated from all roadways. See MR-1: Selection of Alternatives.

675-5 Metro acknowledges the comment regarding the proposed Gate-Down-Bell-Stop Variance (Project Feature PF-NV-3: Gate-Down-Bell-Stop Variance) and appreciates the input on this project feature. The following points provide clarification.

As indicated in Section 3.6-21 of the Draft EIR, Project Features PF-NV-2: Crossing Signal Bell Shrouds and PV-NV-3: Gate-Down-Bell-Stop Variance are project features subject to agency approval, not mitigation measures. The Draft EIR does not assume implementation of Project Features PF-NV-2: Crossing Signal Bell Shrouds and PF-NV-3: Gate-Down-Bell-Stop Variance as a certainty. For full disclosure, predicted noise impacts without implementation of Project Features PF-NV-2: Crossing Signal Bell Shrouds and PF-NV-3: Gate-Down-Bell-Stop Variance are included in Table 4 in Appendix 3.6-B (Noise Analysis Detail Appendix) of the Draft EIR and summarized on pages 3.6-102 to 3.6-103 of the Draft EIR. As discussed on pages 3.6-102 to 3.6-103 of the Draft EIR, should the CPUC not authorize the bell shroud and gate-down-bell-stop project features, noise levels at 92 clusters would exceed the FTA noise criteria.

The LPA does not require at-grade light rail crossings. Therefore, a gate-down-bell-stop variance would not be required for light rail operations under this alternative. The Quiet Zone establishment would eliminate the freight horn noise and would not be applicable to the light rail transit. Audible warnings related to freight crossing signal bells would still ring if and when the Quiet Zone is established as noted on page 3.6-21 of the Draft EIR under Project Feature PF-NV-1: Quiet Zone Equipment Installation.

675-6 Metro values the CPUC's input and would continue to coordinate with the CPUC for all relevant regulatory oversight and to ensure that the final design and operation of the project meet all appliable safety requirements.

675-7 While CEQA does not require evaluation of environmental justice (EJ), the Draft EIR evaluates the project's potential environmental impacts, including air quality, water quality, energy, and access to transit. The project would improve access to public transit and air quality and reduce GHG emissions. Metro has conducted robust public outreach efforts throughout the planning process, including expanded access for participants with limited English proficiency (LEP) and with EJ communities. Metro remains committed to advancing environmental and social justice objectives through agency-wide policies and programs, including its Equity Platform its Moving Beyond Sustainability plan. See Appendix 1-A, Notice of Preparation/ Scoping Summary, of the Draft EIR and Appendix A, Public Engagement Report, of the Final EIR for more information.

Submission 1990 Kim Turner, City of Torrance

1990-1 Metro appreciates the summary of the City's engagement regarding survey responses and support for different options. These responses are noted. All comments have been shared with the Metro Board for their consideration.

1990-2 See MR-9: Light Rail Security and MR-18: Homelessness.

1990-3 The City of Torrance Transit Department's concern is noted. All comments have been shared with the Metro Board for their consideration. See MR-21: Cost Estimates and Schedule.

1990-4 The Draft EIR includes a discussion of the Hawthorne Option for each environmental resources required to be assessed by CEQA. See MR-1: Selection of Alternatives and MR-17: Response to Torrance Community Letter.

1990-5 Chapter 2, Description of the Locally Preferred Alternative, of the Final EIR describes the timeline for the LPA, which is approximately six years, a year longer than the Elevated/At-Grade Alignment that was described for the project in the Draft EIR. The project schedule would continue to be updated as refinements to the design, project cost estimates, and funding plan are advanced. See MR-21: Cost Estimates and Schedule for additional information.

1990-6 While Metro assists in identifying potential First/Last Mile (FLM) improvements during the planning and design phases, the implementation of FLM elements, such as crosswalks, bike lanes, landscaping, and pedestrian safety enhancements, falls under the jurisdiction of the local cities. If the project is approved, Metro would coordinate with the local jurisdictions to assist in FLM planning. With respect to improving connectivity between buses and rail, Metro is committed to such outcomes. As analyzed in Sections 3.1-4.1.1 and 3.1-4.1.2 of the Draft EIR, the project would not interfere with existing bus service or prevent future service expansion. Furthermore, through construction of the proposed Redondo Beach TC Station (as part of the Elevated/At-Grade Alignment, Trench Option, or LPA) or South Bay Galleria Station (as part of the Hawthorne Option), bus riders would have improved access to convenient transit connections between the proposed stations and surrounding destinations.

5.4 RESPONSES TO GROUPS AND ORGANIZATIONS

Submission 8 Teri Shinde, Torrance Logistics Company LLC

8-1 The Draft EIR comprehensively addresses the potentially significant environmental impacts of the project. The presence of natural gas lines and petroleum pipelines, their potential impacts, and applicable regulatory requirements are addressed in Sections 3.9, Hazards and Hazardous Materials, and 3.11 Utilities and Service System, of the Draft EIR. Potential impacts of the LPA in this context are evaluated in Chapter 4, Evaluation of Alternatives, of the Draft EIR. In addition, Section 4.13, Corrections and Additions, of the Final EIR expands on the analysis in Section 3.9-4.2.1 of the Draft EIR by clarifying the protocols, construction techniques, regulations, and standards with which the project would comply. Also see MR-7: Utility Relocation and Hazardous Materials Safety and MR-8: Light Rail and Freight Train Safety. Section 3.1, Transportation, of the Draft EIR evaluates hazards related to geometric design and emergency access. As concluded in the Draft EIR, impacts associated with such hazards would be less than significant.

To address the specific comments raised by both Torrance Logistics Company (TLC) and Torrance Refining Company (TORC), Metro has refined the project footprint to minimize the area of property affected by the proposed BNSF access road. In the Draft EIR, the access road alignment extended into the TORC property. In the Final EIR, the access road has been shifted to the west such that it remains entirely outside TORC's property, and within the existing Metro ROW, except where it connects to the existing BNSF access road parallel to Del Amo Boulevard. This adjustment minimizes the encroachment, preserves access for logistics and contractor activities, and maintains TORC's security perimeter. This refinement also helps reduce construction-related nuisances by moving construction activities farther from critical refining operations and eliminates the need to relocate the TLC pipeline in this area.

This minor adjustment does not result in new or substantially more severe significant environmental impacts not already disclosed in the Draft EIR. See Chapter 3, Design Refinements, and Appendix B, Select Advanced Conceptual Engineering Drawings for the Hybrid/Locally Preferred Alternative, of the Final EIR for more details on the revised access road. Metro has been coordinating and would continue to coordinate with TLC through future phases of the project.

8-2 See response to Comment 8-1. The Draft EIR considers the implications of the project's proximity to the refinery, particularly with respect to hazards, emergency access, and utility coordination, to the extent such issues fall within the scope of CEQA. For example, Section 3.9, Hazards and Hazardous Materials, evaluates the potential for the project to create or exacerbate hazardous conditions in the project area, including in proximity to existing oil and gas pipelines and industrial uses, such as the refinery, which is identified as a recognized environmental condition (see Map ID No. 19 in Table 3.9-1, Sites of Concern (RECs), of the Draft EIR).

As noted in response to Comment 8-1, Metro has refined the design of the project to reduce encroachment onto the refinery's property and to maintain access and security perimeters

(see Chapter 3, Design Refinements, and Appendix B, Select Advanced Conceptual Engineering Drawings - Locally Preferred Alternative, of the Final EIR).

Additionally, alternatives to the project are analyzed in Chapter 4, Evaluation of Alternatives, in the Draft EIR, including the CEQA-mandated No Project Alternative, a High-Frequency Bus Alternative, and the LPA (referred to in the Draft EIR as the 170th/182nd Grade-Separated Light Rail Transit Alternative). Consistent with CEQA Guidelines Section 15126.6(d), each alternative was evaluated in sufficient detail to allow meaningful evaluation, analysis, and comparison with the Elevated/At-Grade Alignment (including the route options).

8-3 The Draft EIR was prepared in accordance with CEQA to ensure a thorough environmental analysis, and public input has been an integral part of the process. Metro initiated coordination with TORC and TLC in 2022, prior to the release of the Draft EIR. Since the publication of the Draft EIR, Metro has met with TLC and TORC multiple times to discuss the project. Metro has been coordinating and would continue to coordinate with TLC and TORC throughout future phases of project design and construction to minimize disruptions to operations. Proposed pipeline relocations are limited to those that are necessary for project construction.

Construction impacts resulting from pipeline and utility relocations have been analyzed in the Draft EIR, as they have been included within the assumptions regarding construction equipment and duration of construction. The Hybrid Alternative was selected as the LPA in May 2024, but the Metro Board has not yet made final decisions regarding the project. For additional information regarding selection of the LPA and the next steps in the review and approval process, see MR-1: Selection of Alternatives.

8-4 See responses to Comments 8-1 and 8-3.

Metro initiated coordination with TORC and TLC in 2022, prior to the release of the Draft EIR, and Metro continues to coordinate with both parties. As described in response to Comment 8-1, the project has been refined to avoid the portion of the TLC pipeline located within the TORC property. While the Final EIR analyzes the environmental impacts associated with construction and operation of the proposed access road, some engineering details would be finalized during the Preliminary Engineering and Final Design phases, including the final utility protection measures, construction engineering methods, and safety coordination protocols. Design and engineering would be conducted by qualified professionals with experience designing and constructing infrastructure adjacent to active refining and pipeline facilities or equivalent. Metro would continue to closely coordinate with TORC and TLC regarding site-specific operational needs, utility protection measures, and compliance with all applicable health, safety, and environmental regulations.

8-5 As noted by the commenter, Metro initially identified five locations along the Metro ROW where relocation of the jet fuel pipeline could be required to accommodate the project. Since the Draft EIR's publication, Metro has continued to refine the project in consultation with TLC. As a result of these refinements, the potential relocation locations have been reduced from five to four. As described in Section 3.11, Utilities and Service Systems, of the Draft EIR, pipeline relocations would be conducted in compliance with industry safety

standards and in close coordination with the affected utility owner. Where feasible, utilities would be protected in place to avoid relocation. Metro would continue to work closely with TLC throughout future phases of design to further minimize potential disruptions to their pipeline and to explore additional opportunities to reduce the extent of required relocations. During construction, Metro would work with TLC to schedule construction activities that minimize operational downtime and disruption to pipeline service to the greatest extent possible.

Potential construction impacts, including those associated with pipeline and utility relocations, have been analyzed in the Draft EIR. These impacts were incorporated into the assumptions regarding construction activities, including equipment use and duration. For a description of the construction assumptions utilized in the Draft EIR, see Appendix 2-B, Construction Methods Memorandum. For additional information regarding utility relocations, see MR-7: Utility Relocation and Hazardous Materials Safety.

8-6 See MR-1: Selection of Alternatives. In May 2024, the Metro Board directed the staff to prepare the Final EIR, fully respond to all public comments on the Draft EIR, and refine costs and funding for the LPA. With respect to piecemealing, Metro did not defer the analysis of reasonably foreseeable and potentially significant impacts associated with the project to a later date. Rather, the Draft EIR evaluates and identifies the potentially significant impacts that could occur as a result of all components of the project, including those identified by TLC. Additionally, this Final EIR provides supporting details and clarifications that reinforce and amplify the Draft EIR's analyses and conclusions. For the potentially significant impacts, the Draft EIR includes mitigation measures to reduce potential impacts to less than significant to the extent feasible. If an impact cannot feasibly be mitigated to a less than significant level, the impact is identified as significant and unavoidable.

Since the publication of the Draft EIR, Metro has refined the project design as discussed above. Following the release of the Final EIR, the Metro Board, as the decision-making body of the Lead Agency, will consider whether to certify the Final EIR and approve the project, taking into account all public comments and feedback received from public engagement.

Submission 45 Tony Dolim, South Bay Estates

45-1 The commenter's opposition to the alignments along the Metro ROW is noted. All comments have been shared with the Metro Board for its consideration. See MR-1: Selection of Alternatives. Also see responses to Comments 45-2 through 45-6.

45-2 Metro has worked diligently to develop feasible and effective mitigation measures to address the potentially significant impacts of the project. Metro is also committed to integrating safety into all Metro rail operations. The project would comply with relevant safety standards, including the California Manual on Uniform Traffic Control Devices, the California Department of Transportation Highway Design Manual, the Americans with Disabilities Act (ADA), and Metro's Grade Crossing Safety Policy. The LPA, selected by the Metro Board in May 2024, the Trench Option, and the Hawthorne Option would fully grade separate light rail from all roadways, thereby avoiding potential light rail train conflicts with pedestrians or cyclists. Existing freight crossings would be upgraded with safety

enhancements to be quiet zone ready. See MR-8: Light Rail and Freight Train Safety; MR-9: Light Rail Security; and MR-10: Changes to Community Character.

45-3 The potential for vibration impacts for the Elevated/At-Grade Alignment, the Trench Option, and the Hawthorne Option is addressed in Section 3.6, Noise and Vibration, of the Draft EIR. The potential for LPA impacts is addressed in Chapter 4, Evaluation of Alternatives, of the Draft EIR. The noise and vibration analyses were performed in accordance with the Federal Transit Administration (FTA) Transit Noise and Vibration Impact Assessment Manual (FTA, 2018), which is the industry standard for evaluating noise and vibration impacts from transit projects. This guidance provides a well-established and widely accepted framework for determining the potential effects of noise and vibration on sensitive receptors, including residential properties

Regarding operational noise impacts, the South Bay Estates were assessed in the analysis as Clusters G27 through G30. Because noise impacts are assessed based on exterior noise levels, a building's insulation has no bearing on the analysis. As shown in Figure 3.6-23, a soundwall is proposed along the eastern boundary of the Metro ROW, as required by Mitigation Measure MM-NOI-2: Soundwalls. The soundwall locations are also detailed in Table 3.6-26. With the implementation of the mitigation measures identified in the Draft EIR, operational noise impacts for Clusters G27 through G30 would be reduced to less than significant levels, as shown in Draft EIR Appendix 3.6-B, Table 4, pages 30-31 (showing mitigated light rail noise impacts), and Table 5, pages 38–39 (showing mitigated light rail plus freight relocation impacts). Additional details on proposed noise mitigation measures are available in Major Topic Response MR-3: Operational Noise Project Features and Mitigation Measures.

Similarly, with implementation of the mitigation measures identified in the Draft EIR, operational vibration annoyance impacts would be reduced to less than significant at all receptors under each alignment option and alternative. This would be accomplished through operational vibration impacts, implementation of Mitigation Measure MM-VIB-4: Low Impact Frogs, MM-VIB-5: Resilient Fasteners, and MM-VIB-6: Ballast Mats, as described in Sections 3.6-5 and 3.6-6.2.2 of the Draft EIR. As discussed on page 3.6-92 of the Draft EIR, operational vibration impacts are associated with annoyance, not damage; therefore, damage-related operational vibration impacts are not anticipated. MM-VIB-2: Construction Equipment Location and MM-VIB-3: Pre- and Post-Construction Surveys would reduce vibration damage and annoyance impacts to less than significant levels for all alignments studied in the Draft EIR.

Regarding concerns specific to mobile homes, the operational vibration analysis was performed on a dwelling unit basis, which ensured that all dwelling units within the calculated impact distance, including individual mobile homes, were assessed individually. The results of this analysis are shown in the vibration impact maps in Appendix 3.6-C of the Draft EIR. It is important to note that the suggestion that modular homes are more susceptible to damage from vibration is not supported by the FTA's guidance or other empirical evidence. Modular homes are generally more flexible than traditional homes built on concrete slabs with rigid features such as brick fireplaces and plaster walls, making modular homes less likely to sustain damage from vibration. Additionally, no empirical evidence supports the claim that train-induced vibration causes damage to electrical lines,

or other buried utilities. Regarding potential for structural impacts during operations, see MR-5: Vibration Impact Types and Impact Thresholds. The project incorporates design features and mitigation measures to ensure that vibration levels caused by operation of the project remain within the acceptable levels established by the FTA for damage-related and annoyance-related vibration impacts. Noise: As for construction noise impacts, as indicated by the comment, the Draft EIR discloses that each alignment option would result in potentially significant construction-related noise impacts. To address these impacts, the project would implement MM-NOI-1: Noise Control Plan. While implementation of this measure would reduce the construction noise impacts to the maximum extent feasible, some noise and impacts during construction would remain significant and unavoidable, as discussed in Section 3.6-6 of the Draft EIR.

Vibration: For construction vibration impacts, the Draft EIR identifies temporary vibration impacts that could occur from certain activities, including pile driving, heavy equipment operation, and other high-impact construction methods. Both vibration damage and vibration annoyance impacts are assessed. To address vibration-related *damage* impacts, Mitigation Measures MM-VIB-1: Vibration Control Plan, MM-VIB-2: Construction Equipment Location, and MM-VIB-3: Pre- and Post-Construction surveys, would be required. With implementation of these mitigation measures, potential vibration *damage* impacts of the LPA, the Trench Option, and the Hawthorne Option, would be less than significant. However, the Elevated/At-Grade Alignment would result in a significant and unavoidable vibration *damage* impact, even with implementation of mitigation.

The construction vibration *annoyance* impacts of the Metro ROW alignments and the Hawthorne Option would be significant and unavoidable. These would be temporary and linked to the use of the most vibration intensive types of equipment (e.g., pile drivers and vibratory compactors), which may only be in use for a short period near any given property. Implementation of MM-VIB-1: Vibration Control Plan, would reduce these impacts, though not necessarily to a less than significant level at all times and locations during construction. Therefore, the construction vibration-related *annoyance* impacts are considered significant and unavoidable for each light rail alignment and alternative.

The presence of natural gas lines and petroleum pipelines, their potential impacts, and applicable regulatory requirements are addressed in Sections 3.9, Hazards and Hazardous Materials, and 3.11 Utilities and Service System, of the Draft EIR. Potential impacts of the LPA in this context are evaluated in Chapter 4, Evaluation of Alternatives, of the Draft EIR. In addition, Section 4.13, Corrections and Additions, of the Final EIR expands on the analysis in Section 3.9-4.2.1 of the Draft EIR by clarifying the protocols, construction techniques, regulations, and standards with which the project would comply. As detailed therein, these clarifications do not change the Draft EIR's conclusion that impacts related to oil and gas pipelines would be less than significant. See MR-7: Utility Relocation and Hazardous Materials Safety, MR-8: Light Rail and Freight Train Safety; and MR-13: Soil Stability and Sinkholes. Regarding underground utilities, Metro would conduct pre-construction surveys and site-specific geotechnical investigations as required by Project Feature PF-HWQ-4: Trench Operation Runoff Collection and Treatment, ensuring that all utilities, including gas, electricity, water, and sewer lines, are properly identified, protected, and relocated if necessary to avoid disruption to residents. Post-construction, Metro would restore affected

infrastructure to meet or exceed its pre-construction condition. See MR-7: Utility Relocation and Hazardous Materials Safety.

45-4 See response to Comment 45-2 and MR-18: Homelessness. The project includes numerous safety features specifically designed to prevent unauthorized access to the tracks and reduce safety risks for nearby communities. As described in Chapter 2, Project Description, of the Draft EIR, the entire light rail guideway would be enclosed by physical barriers, such as fencing, soundwalls, or a combination of both, to prevent unauthorized access. These barriers would help deter entry onto the tracks, including by children, and significantly reduce the potential for accidents or injuries. In addition to physical barriers, the project would include lighting, security cameras, and regular patrols consistent with Crime Prevention through Environmental Design (CPTED) principles and Metro's systemwide safety and security practices. These features are intended to promote safety, discourage loitering, and address concerns about crime or unauthorized access, particularly in areas that may currently lack adequate lighting or visibility. CEQA does not require an analysis of safety in terms of crime, as it is not an environmental issue, and therefore, the Draft EIR does not make any conclusions regarding this topic. However, for informational purposes, see MR-9: Light Rail Security. See also MR-8: Light Rail and Freight Train Safety.

45-5 The commenter's preference for the Hawthorne Option over the Metro ROW alignments is noted. All comments have been shared with the Metro Board for its consideration. The stated preference relates to the perception that the Hawthorne Option would better link riders with businesses, in addition to the Hawthorne Option resulting in fewer CEQA impacts than the Metro ROW alignments. The comment further states that the Draft EIR is deficient in concluding that all three of the proposed alignment options would be equivalent in their impacts to noise, light pollution, and carbon emissions without providing substantive consideration of the anticipated specific impacts of each option. Although the CEQA significance determinations may be similar across the alignment options, that does not indicate the types or magnitude of impacts would be equivalent. The Draft EIR presents separate analyses for each option for each environmental resource topic, supported by substantial evidence; see Section 3.3, Aesthetics; Section 3.5, Greenhouse Gas Emissions; and Section 3.6, Noise and Vibration, of the Draft EIR. These sections, along with Chapter 4, Evaluation of Alternatives, of the Draft EIR, clearly detail differences between the alignment options. For example, Table 3.5-16 on page 3.5-29 compares operational GHG emissions between the Elevated/At-Grade Alignment, the Trench Option, and the Hawthorne Option. GHG emissions associated with the LPA are discussed on page 4-42 of the Draft EIR. Table 3.5-16 demonstrates that although an impact conclusion may be the same for all alignment alternatives, the quantity of GHG emissions differs.

In regard to the commenter's statement that revitalization would occur along Hawthorne Boulevard, studies show that revitalization with transit investments is focused around station areas, typically within a quarter-mile to half-mile catchment area of the station, which is a considered a reasonable walking distance (5- to 10-minute walk). Both proposed stations in Redondo Beach include businesses along Hawthorne Boulevard within the station catchment area. See MR-14: Property Values and Impacts to Businesses.

45-6 The commenter's support for the Hawthorne Option is noted. All comments have been shared with the Metro Board for its consideration. See responses to Comments 45-2 through 45-5. See also MR-10: Changes to Community Character.

Submission 50 Halland McKenna, McKenna Auto Group

50-1 Metro recognizes the importance of minimizing impacts to homes and businesses. The Hybrid Alternative, which travels along the Metro ROW, was selected as the LPA by the Metro Board in May 2024 in part because it would reduce the number of potential permanent property acquisitions compared to other alignment options.

However, the final decisions regarding the project, including the alignment to be approved, will not be made until after the Final EIR is certified and considered by the Metro Board.

Should permanent property acquisition be required, Metro would comply with all applicable laws and regulations, including the California Relocation Act (Government Code Section 7260 et seq.) and Metro's internal policies. Metro would provide relocation assistance and compensation to eligible displaced property and business owners, in accordance with these regulations. Just compensation would be based on the fair market value established by an approved appraisal, and all affected property owners would be notified in advance and informed of their rights and eligibility for assistance and benefits.

50-2 Metro notified all property owners along the proposed alignments as part of the environmental review process, including letters to all owners of properties that could be affected by the alignments studied in the Draft EIR. Business-specific outreach efforts have been conducted along each alignment under study. In addition to public meetings, Metro accepts comments from business owners through all standard channels, including email, phone, and written submissions. These comments are part of the public record and are considered in the environmental review and decision-making process. While formal negotiations related to property acquisition would occur only if and when the project is approved, Metro encourages input from all stakeholders throughout the environmental review process. Additionally, the Metro Board allocates funding for real estate. Businesses displaced as a result of the project would be given advance written notice and informed of their eligibility for relocation assistance and payments before being required to move. See response to Comment 50-1 for additional information on property acquisitions.

50-3 Metro works to avoid and minimize property acquisitions to the greatest extent possible, but in some cases, property acquisition is unavoidable. Metro published the 2023 Real Estate Acquisitions Report, published concurrently with the Draft EIR, and updated it in 2025 for LPA. See response to Comment 50-2.

50-4 Metro has not conducted an economic impact study for the project. Metro understands concerns regarding property values. However, under CEQA, economic impacts such as changes in property values or loss of property tax revenues are not considered environmental impacts. The Draft EIR focuses on physical environmental impacts and measures to mitigate them, as required by CEQA. However, Metro's goal is to help businesses continue to operate throughout construction and post-construction. See MR-14: Property Values and Impacts to Businesses.

Submission 86 Craig St. John, Westwood Building Supplies

86-1 The commenter's opposition to the Trench Option is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives. See response to Comment 86-2 related to construction traffic.

86-2 Based on the current level of design, construction of the Trench Option may take up to seven years. The LPA would take less time to construct than the Trench Option, given that there is significantly less area to excavate and is estimated to take approximately six years to construct. Construction would occur in phases and activities would be distributed throughout the entire project area. This means construction would not occur continuously in any one location. See Appendix 2-B, Construction Methods Memorandum, of the Draft EIR, for more detailed information on the construction duration. Additionally, Metro published a summary of estimated construction costs and schedule concurrent with the Draft EIR in 2023. See MR-21: Cost Estimates and Schedule for additional information.

Although construction activities would result in partial and full road closures, Metro is committed to minimizing disruption to local businesses. As part of Project Feature PF-T-1: Construction Traffic Management Plan, described in Section 3.1, Transportation, of the Draft EIR, the project would implement a Construction Traffic Management Plan (CTMP), which would manage closures, maintain access, and coordinate with businesses. For instance, the CTMP requires Metro to ensure that "vehicle and pedestrian access will remain available from at least one entry and egress point … during construction with access to businesses maintained during normal business hours." The CTMP also requires Metro to coordinate with impacted businesses to limit disruptions.

86-3 See response to Comment 86-2. Concurrent with the Draft EIR, Metro published the 2023 Transportation Detail Report, which provides discussions of constructed-related traffic conditions near the intersection of Inglewood Avenue and Manhattan Beach Boulevard. The project is early in the development process, and all construction plans are preliminary. As described on page 3.1-43 of the Draft EIR, construction would require some temporary partial and full road closures. For the Elevated/At-Grade Alignment, LPA, and Hawthorne Option, construction of the elevated light rail structure crossing over Manhattan Beach Boulevard may necessitate such closures. The LPA and Trench Option would also involve temporary partial or full road closures due to the excavation needed to build a trench beneath the road.

86-4 Section 3.5, Greenhouse Gas Emissions, of the Draft EIR, comprehensively studies greenhouse gas (GHG) emissions associated with construction activities, including idling from traffic delays and road closures. The analysis focuses on how the implementation of the project would affect regional GHG emissions, accounting for short-term emissions that would be generated by construction equipment and vehicle trips, as well as long-term, permanent changes in emissions during future operations. For construction-related GHG emissions, which are temporary by nature, the Draft EIR follows the South Coast Air Quality Management District (SCAQMD) Draft Guidance Document – Interim CEQA Greenhouse Gas Significance Threshold (2008), which states that for CEQA assessments, construction-related GHG emissions that occur over a relatively short-term period should be amortized over a 30-

year operational project lifetime. Important to the context for assessing short-term GHG emissions, Table 3.5-10 of the Draft EIR shows that the Elevated/At-Grade Alignment, Trench Option, and the Hawthorne Option would result in a long-term, operational reduction in regional GHG emissions by displacing passenger vehicle trips that would have otherwise occurred in the absence of light rail ridership. Similarly, the LPA would also result in a net GHG emissions reduction. Temporary, construction-related increases in localized GHG emissions associated with traffic delays and congestion would be offset by the long-term operational GHG benefits of the project.

Additionally, the provision of traffic detours to avoid street closures during construction would minimize excess GHG emissions that could occur from traffic delays. For example, as discussed in Section 3.1, Transportation, of the Draft EIR, the CTMP requires detour plans to reroute vehicular traffic to avoid street closures during construction.

86-5 Metro has not conducted an economic impact study for the project. Under CEQA, economic impacts such as changes in property values are not considered environmental impacts. Accordingly, the Draft EIR focuses on physical environmental impacts and measures to mitigate them, as required by CEQA. Nonetheless, Metro understands concerns regarding property values. Metro is committed to supporting local businesses during construction and beyond. Small businesses may be eligible to apply for financial assistance through Metro's Business Interruption Fund, which is designed to cover certain fixed operating expenses during periods of construction and disruption. See MR-14: Property Values and Impacts to Businesses for additional information.

Submission 95 Right of Say/Redondo Beach Quality of Life Coalition

95-1 The comment states that, "the Metro Draft EIR is defective and fails to consider reasonably expected health and property value damages based on substantial evidence discussed below." See responses to Comments 95-2 through 95-26 for responses to specific comments.

Additionally, Metro understands concerns regarding property values. However, under CEQA, economic impacts such as changes in property values are not considered environmental impacts. The Draft EIR focuses on physical environmental impacts and measures to mitigate them, as required by CEQA. To address questions and concerns on property values, Metro has prepared more information. See MR-14: Property Values and Impacts to Businesses. Also see MR-4: Potential Negative Health Effects Related to Noise, Vibration, and Air Quality and MR-10: Changes to Community Character.

95-2 State law preempts Metro from compliance with local zoning ordinances (*see Rapid Transit Advocates, Inc. v. Southern California Rapid Transit District* (1986) 185 Cal.App.3d 996). The project is not subject to Redondo Beach Municipal Code 10-2.2502 related to Planning Design Review. Metro, as the CEQA Lead Agency, has the responsibility to determine the appropriate criteria for the project. The Metro ROW is owned by Metro, and not regulated by the City of Redondo Beach. The Redondo Beach Municipal Code does not apply to the Metro ROW.

95-3 The project does not violate Redondo Beach Municipal Code 4-24.301 related to noise. As noted in response to Comment 95-2, state law preempts the applicability of local zoning ordinances to Metro. Section 4-24.604 of the Redondo Beach Municipal Code expressly states that the noise standards set forth in section 4-24.301 do not apply to activities that are preempted by state law. Moreover, Metro, as the CEQA Lead Agency, has the responsibility to determine the appropriate criteria for the project and has utilized the FTA's noise impact criteria, which was specifically developed to address transit noise based on well-documented criteria and research on human response to community noise. See MR-2: Operational Noise Analysis Methodology and Impact Thresholds. As discussed therein, application of the FTA criteria contrasts with the "brightline" operational noise thresholds used by many local jurisdictions, which set fixed operational limits without considering existing noise levels. In many cases, these city thresholds have already been exceeded by existing conditions.

95-4 The comment states that, "Project alternatives that use the existing freight right-of-way create a variety of health damages." See MR-4: Potential Negative Health Effects Related to Noise, Vibration, and Air Quality. It is not technically feasible to correlate project-specific effects to specific health outcomes, given the complexity of factors contributing to these conditions. However, health effects related to air quality, noise, and other CEQA resources would be reduced with implementation of the proposed mitigation measures.

95-5 The comment states that, "Project alternatives that use the existing freight right-of-way damage child development." See response to Comment 95-4 and MR-4: Potential Negative Health Effects Related to Noise, Vibration, and Air Quality.

95-6 The comment states that, "The Metro Draft EIR is defective and fails to consider reasonably expected health and property value damages based on substantial evidence discussed below." See responses to Comments 95-7 through 95-10 for responses to specific comments. Also see MR-14: Property Values and Impacts to Businesses.

95-7 The referenced National Institutes of Health article does not discuss light rail train noise. It provides no evidence that the project would result in "significant and non-mitigable negative impacts on health and property values." Articles such as those cited by the commenter often address general or cumulative effects of noise from various types of rail or transportation systems, including heavy freight, passenger rail, and light rail. The project is a proposed light rail system, which operates differently than heavy rail or freight systems, with shorter and lighter trains and electric propulsion (reducing noise compared to diesel-powered freight trains). These distinctions mean that impacts identified in general studies may not directly apply to the project.

Metro understands concerns regarding property values. However, under CEQA, economic impacts such as changes in property values are not considered environmental impacts. The Draft EIR focuses on physical environmental impacts and measures to mitigate them, as required by CEQA. To address questions and concerns on property values, Metro has prepared more information. See MR-14: Property Values and Impacts to Businesses. Also see MR-4: Potential Negative Health Effects Related to Noise, Vibration, and Air Quality.

95-8 The cited material does not provide evidence that light rail noise generates larger "impacts" than road traffic. In addition, such a generalized statement does not account for the type of on-road vehicle (e.g., heavy-duty truck versus electric vehicle), the distance from the source to the receptor (e.g., 25 feet versus 100 feet), and other important factors in ambient sound levels. See MR-4: Potential Negative Health Effects Related to Noise, Vibration, and Air Quality.

95-9 While Metro acknowledges Beach Cities Health District's (BCHD) aim to promote community health, Metro cannot comment on BCHD's decisions or actions, as it is an independent entity. Therefore, questions regarding BCHD's decisions and priorities would best be directed to BCHD.

95-10 The cited Blue Zones article provides no evidence that the project would result in health effects. See MR-4: Potential Negative Health Effects Related to Noise, Vibration, and Air Quality.

95-11 See MR-4: Potential Negative Health Effects Related to Noise, Vibration, and Air Quality. It should be clarified that the "fair argument" standard referenced in the comment applies to the determination of whether an EIR must be prepared in the first place. In this case, Metro has already prepared a full EIR in accordance with CEQA to analyze the potential environmental impacts of the project and options.

95-12 See response to Comment 95-2.

95-13 See MR-14: Property Values and Impacts to Businesses.

95-14 With respect to Redondo Beach Municipal Code 4-24.301, see responses to Comments 95-2 and 95-3. Also see MR-2: Operational Noise Analysis Methodology and Impact Thresholds.

Although Metro is not subject to local zoning ordinances, pursuant to Mitigation Measure MM-NOI-1: Construction Noise Control Plan, Metro would obtain a variance from the applicable local jurisdiction when nighttime work is required.

The project would not operate 24 hours per day for seven days a week. The project is expected to follow the operating patterns of Metro's current rail lines. The anticipated hours of operation are 4:00 a.m. one day to 1:00 a.m. the following day. System headways would be reduced during early morning (4:00 a.m. to 6:00 a.m.) and late-night hours (7:00 p.m. to 1:00 a.m.) to approximately 15 minutes. This would result in a reduced frequency of trains during these hours and reduced overall noise compared to peak-hour system headways of 5 minutes. Weekend system headways would be reduced compared to weekdays.

95-15 See response to Comment 95-14.

95-16 See MR-4: Potential Negative Health Effects Related to Noise, Vibration, and Air Quality. See response to Comment 95-17 related to the cited Blue Zone Articles.

95-17 The cited "Blue Zones" report does not contain any comparison between high-capacity transit and widened roadways, nor does it state that transit service – let alone light rail

service – creates greater negative health outcomes than roadway expansion. Rather, the cited passage encourages active transportation, including walking, as a means of supporting community well-being and livability. The project is consistent with many of the principles described in the Blue Zones approach, including improving community connectedness.

95-18 See responses to Comments 95-8 through 95-14, which address the issues raised in this comment. Regarding health effects, see MR-4: Potential Negative Health Effects Related to Noise, Vibration, and Air Quality.

95-19 The link provided for the National Geographic article on rail noise and stress in East Palestine is broken. Regardless, articles such as the National Geographic article often address general or cumulative effects of noise from various types of rail or transportation systems, including heavy freight, passenger rail, and light rail. The project is a proposed light rail system, which operates differently than heavy rail or freight systems, with shorter and lighter trains and electric propulsion (reducing noise compared to diesel-powered freight trains). These distinctions mean that impacts identified in general studies may not directly apply to the project. This comment does not dispute the contents of the Draft EIR. The Draft EIR, on page 3.6-48, explains why it is unlikely for light rail noise to result in noise-induced hearing loss, but acknowledges that increased levels in noise could increase stress at affected uses. Mitigation Measures MM-NOI-2: Soundwalls and MM-NOI-3: Low Impact Frogs would reduce these effects.

95-20 The commenter submits an article titled, “Effects of Exposure to Road, Railway, Airport and Recreational Noise on Blood Pressure and Hypertension,” as evidence of project impacts. This comment does not dispute the contents of the Draft EIR. See response to Comment 95-19.

95-21 The commenter submits an article titled, “The Effect of Aircraft, Road, and Railway Traffic Noise on Stroke – Results of a Case-Control Study Based on Secondary Data,” as evidence of project impacts. The study referenced in the comment appears to focus on general railway noise, which often includes freight trains. Freight rail noise levels are typically higher than those from light rail transit, due to differences in propulsion systems, train length and weight, and horn usage. This comment does not dispute the contents of the Draft EIR. See response to Comment 95-19.

95-22 The commenter submits an article titled, “Transportation Noise and Risk of Tinnitus: A Nationwide Cohort Study from Denmark” as evidence of project impacts. This comment does not dispute the contents of the Draft EIR. See response to Comment 95-19.

95-23 The commenter submits an article titled, “A study of self-reported health problems of the people living near railway tracks in Raipur city,” as evidence of project impacts. This comment does not dispute the contents of the Draft EIR. See response to Comment 95-19.

95-24 See MR-4: Potential Negative Health Effects Related to Noise, Vibration, and Air Quality. It is not technically feasible to correlate project-specific effects to specific health outcomes, given the complexity of factors contributing to these conditions. However, health effects related to air quality, noise, and other CEQA resources would be reduced with implementation of the proposed mitigation measures.

95-25 See responses to Comments 95-1 through 95-24.

95-26 The commenter's opposition to the project is noted. The Metro Board has selected the LPA and has not yet approved the project, including any of the options and alternatives evaluated in the Draft EIR. The final decision will be made after the Metro Board reviews the Final EIR, which will include responses to all public comments, including those of the commenter.

Submission 118 Barret Burt, Ganahl Lumber

118-1 Since publication of the Draft EIR, Metro has met with Ganahl Lumber multiple times to discuss the project and its potential effects on the property. As discussed in the coordination meetings, the project would require relocation and reconstruction of a spur track in the area, but this work would be phased and scheduled to occur during weekends to reduce disruption. Based on the proposed track modifications, construction would be completed during approximately five work windows, spaced out on non-consecutive weekends across 12 to 18 months. This approach is intended to avoid the need for facility closure and to minimize interference with day-to-day operations. Therefore, construction of the project would not lead to secondary impacts, such as increased truck traffic around the facility, or other effects that would materially alter site access or functionality. Metro will continue to coordinate with Ganahl Lumber to develop strategies and construction staging plans to minimize disruptions to Ganahl Lumber's operations.

Under CEQA, economic impacts are not considered environmental impacts. However, Metro is committed to minimizing disruption to local businesses. As part of Project Feature PF-T-1: Construction Traffic Management Plan described in Section 3.1, Transportation, of the Draft EIR, the project would implement a CTMP, which would manage closures, maintain access, and coordinate with businesses. For instance, the CTMP requires Metro to ensure that "vehicle and pedestrian access will remain available from at least one entry and egress point … during construction with access to businesses maintained during normal business hours." The CTMP also requires Metro to coordinate with impacted businesses to limit disruptions.

118-2 See response to Comment 118-1.

Submission 119 William Oberholzer, Undisclosed Business in Torrance

119-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 120 Yuki Escovar, Torrance Area Chamber of Commerce

120-1 The commenter's support for the Elevated/At-Grade Alignment is noted. Metro also notes the organization's stated concern for the Trench and Hawthorne Options. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

120-2 See response to Comment 120-1.

Submission 129 Tim Morey, Life Covenant Church

129-1 The commenter's concern for impacts to sensitive receptors at the Life Covenant Church is noted. All comments have been shared with the Metro Board for their consideration. See response to Comments 129-2 through 129-8.

129-2 Metro completed a Phase I Environmental Site Assessment (ESA), published as an appendix to the Draft EIR. The Phase I ESA identified the former AMP site located at 355-455 Maple Avenue, near Life Covenant Church, as a Recognized Environmental Condition (REC), due to its past history of contamination.

However, the construction limits in this area are located within the Metro ROW and do not include the AMP site or adjacent church property. As a result, no soil disturbance is anticipated near Life Covenant Church. As described in Section 3.9-4.4 of the Draft EIR, consistent with Project Feature PF-HHM-3: Property Acquisition Phase II Site Investigation, Phase II site investigations be conducted during the preliminary engineering phase for locations where construction activity could occur and where contamination is suspected. These investigations would assess the potential for contamination in soil, groundwater, and soil vapor. If contamination is found, appropriate remediation or corrective action would be implemented under the oversight of appropriate regulatory agencies and in compliance with all applicable laws and regulations.

Although the Metro ROW is near the former AMP site, Table 3.9-2 of the Draft EIR specifies that the planned limited Phase II site investigation in this location is intended to assess potential groundwater contamination only and does not involve excavation or disturbance of the site itself. Table 3.9-2 has been revised in Section 4.13, Corrections and Additions, of the Final EIR to clarify this point.

Regarding the identification of sensitive receptors, Section 3.9, Hazards and Hazardous Materials, of the Draft EIR does not define or inventory sensitive receptors in the same manner as other resource areas, such as air quality or noise. However, the analysis does evaluate whether the project could emit hazardous materials or involve hazardous activities within one-quarter mile of schools, which is required pursuant to Public Resources Code Section 21151.4. The presence of Life Covenant Church in proximity to the Metro ROW was considered in preparation of the Draft EIR and is factored into the commitment to conduct site-specific investigations and implement appropriate best-management practices. Metro remains committed to coordinating with nearby community facilities as the project advances into future phases of design and construction.

129-3 Potential impacts associated with soil stability, erosion, flooding, and subsidence are addressed in Section 3.8, Geology, Soils, and Paleontological Resources, of the Draft EIR. The potential for LPA impacts is addressed in Chapter 4, Evaluation of Alternatives, of the Draft EIR. As discussed in Section 3.8-4.6 of the Draft EIR, the project would incorporate Project Feature PF-GEO-1: Metro Geotechnical Design Standards, which requires compliance with Metro's Geotechnical Design Standards, as outlined in the Metro Rail Design Criteria. These standards ensure that the final design is informed by detailed geotechnical investigations conducted during the preliminary engineering phase. These investigations would assess local soil conditions, including near sensitive community facilities, such as the Life Covenant

Church, and identify any risks of subsidence, settlement, instability, or lateral deformation due to project construction or operation. Where needed, appropriate design features, such as retaining walls with integrated drainage, would be implemented to address soil stability and manage stormwater runoff, including where bridge expansion is planned near the Maple Avenue/Del Amo Boulevard intersection. These drainage systems are designed to manage groundwater and prevent water accumulation behind the walls, thereby maintaining slope and structural stability during various weather events, including heavy rains. For the foregoing reasons, the Draft EIR concludes that construction and operational impacts associated with the Elevated/At-Grade Alignment, Trench Option, and Hawthorne Option are less than significant.

129-4 The light rail under the LPA, Trench Option, and Hawthorne Option would be fully grade-separated from all roadways, thereby entirely avoiding at-grade conflicts, including potential interference with emergency access. For the Elevated/At-Grade Alignment, the frequency of the railroad crossing gate-down time would increase relative to existing conditions; however, access for emergency vehicles would remain available via alternate routes within approximately a half-mile. See MR-12: Emergency Access.

Regarding potential emergency scenarios, such as derailment, fires, or seismic events, the project includes standard design requirements and operational practices that comply with federal and state regulations. See MR-8: Light Rail and Freight Train Safety for details.

Per CEQA, the Draft EIR evaluates whether the project would result in the need for new or expanded emergency service facilities due to physical environmental changes. The analysis in Section 3.15, Public Services, concludes that the project would not create such a need. Metro remains committed to working with local emergency service providers, including those serving the area around Life Covenant Church, to ensure emergency preparedness and safety during all phases of the project.

129-5 See MR-8: Light Rail and Freight Train Safety. As described in Chapter 2, Project Description, of the Draft EIR, the entire light rail guideway would be enclosed with physical barriers, such as fencing, soundwalls, or a combination of both, to prevent unauthorized intrusion. In many areas, the existing fencing has been breached, and would be repaired under the project, which would limit unauthorized access into the Metro ROW to ensure safety near operating rail. CEQA does not require an analysis of safety in terms of crime, as it is not an environmental issue, and therefore, the Draft EIR does not make any conclusions regarding this topic.

129-6 The noise analysis in the Draft EIR follows the FTA Transit Noise and Vibration Impact Assessment Manual (2018), which specifies the use of 24-hour time-averaged noise levels to assess the ambient noise environment. These levels capture all sound sources, including the occasional freight train pass-by, as part of the existing baseline. The analysis also incorporates a 10-dBA penalty for all sound occurring during the nighttime hours (10:00 p.m. to 7:00 a.m.) to account for increased sensitivity to noise during these hours. The effect of the penalty is that in the calculation of 24-hour noise, any event that occurs during the nighttime hours is equivalent to 10 of the same events during the daytime hours. This ensures the assessment reflects the potential for greater disturbance from nighttime noise events.

The 24-hour noise measurements include both periods when the freight is not operating and periods when freight is operating. Although noise from freight trains is loud and increases the 24-hour average noise levels, its infrequent occurrence during the day means that it does not dominate or skew the overall noise profile. Excluding the freight noise from the existing ambient noise conditions would not comply with FTA methodology and would misrepresent the true ambient noise environment. For additional detail, see MR-2: Operational Noise Analysis Methodology and Impact Thresholds.

Mitigation measures and project features include Mitigation Measure MM-NOI-3: Low Impact Frogs to reduce track crossover noise, Project Feature PF-NV-2: Crossing Signal Bell Shrouds to dampen crossing signal bells, and Project Feature PF-NV-3: Gate-Down-Bell-Stop Variance to limit the duration of bell ringing. See MR-3: Operational Noise Project Features and Mitigation Measures for more information.

The LPA and Trench Option would further reduce operational noise impacts compared to the Elevated/At-Grade Alignment by eliminating the at-grade light rail crossings at 170th and 182nd Streets. By grade-separating the light rail from all roadways, the LPA, Trench Option, and Hawthorne Option remove the need for audible warnings at light rail crossings, such as routine train horns and crossing bells. The Draft EIR concludes that operational noise impacts from the LPA, Trench Option, and Hawthorne Option would be less than significant; Section 4.10, Corrections and Additions, of the Final EIR confirms this determination with respect to the LPA.

New landscaping would be included along the Metro ROW to enhance the aesthetic environment and attenuate noise. The specific soundwall materials and configurations would be determined at a later phase of design.

The commenter also requests a mitigation measure limiting construction near the church during Sunday morning and Wednesday evening services, Metro acknowledges the desire to avoid disruption to sensitive uses. However, due to the scale, complexity, and duration of the project, and the need to coordinate multiple construction crews and timelines across jurisdictions, restricting work during specific weekly hours at a single location is not feasible as a general mitigation requirement. Pursuant to Mitigation Measure MM-NOI-1: Noise Control Plan, Metro would require the contractor to implement reasonable noise controls (such as noise barriers and quieter equipment) and maintain a complaint response system to address site-specific concerns, including those related to church services. However, because it is possible that construction could still exceed the FTA construction noise criteria during certain activities, these impacts are disclosed in the EIR as significant and unavoidable.

129-7 The air quality analyses in the Draft EIR were prepared in accordance with SCAQMD guidance, which include assessing localized air quality impacts at sensitive receptor locations near construction activities. The Life Covenant Church is located approximately 450 feet from the nearest project footprint perimeter. The localized emissions analysis, as shown in Table 3.4-21 of the Draft EIR, evaluated impacts on sensitive receptors within 50 feet of the construction zone. The analysis concluded that localized air quality impacts would be less than significant. Because the Life Covenant Church is well beyond the 50-foot radius used in the analysis, there is no potential for significant air quality impacts related to pollutant

concentration exposures at this location. Project Features PF-AQ-1: Metro Green Construction Policy Compliance and PF-AQ-2: SCAQMD Rule 403 Compliance mandate the use of off-road construction equipment outfitted with engines meeting Tier 4 emissions standards and require stringent best-management practices to minimize fugitive dust generation, including the application of water to disturbed ground areas and material stockpiles and covering haul trucks with tarps. These measures are expected to substantially reduce diesel particulate matter and dust emissions near the construction zone and would also be required for the LPA.

129-8 As described in Section 3.6, Noise and Vibration, of the Draft EIR, Section 3.6-5, the project would be required to implement Mitigation Measures MM-VIB-3: Pre- and Post-Construction Surveys through MM-VIB-6: Ballast Mats, which would require low impact frogs, resilient rail fasteners, and/or ballast mats. With implementation of these mitigation measures, operational vibration levels associated with the project would be reduced to below FTA operational vibration impact thresholds.

Regarding construction vibration impacts, the Draft EIR identifies temporary vibration impacts that could occur from certain activities, including pile driving, heavy equipment operation, and other high-impact construction methods. To address these impacts, Mitigation Measures MM-VIB-1: Vibration Control Plan, MM-VIB-2: Construction Equipment Location, and MM-VIB-3: Pre- and Post-Construction surveys would be required.

The construction vibration annoyance impacts of each of the alignment options studied in the Draft EIR would be significant and unavoidable. These would be temporary and linked to the use of the most vibration-intensive types of equipment (e.g., pile drivers and vibratory compactors), which may only be in use for a short period near any given property. Although construction vibration damage impacts of the LPA, the Trench Option, and the Hawthorne Option would be less than significant with mitigation, this impact would be significant and unavoidable for the Elevated/At-Grade Alignment due to the need for pile driving to reconstruct the Grant Avenue Bridge. Implementation of the Mitigation Measures MM-VIB-1: Vibration Control Plan, MM-VIB-2: Construction Equipment Location, and MM-VIB-3: Pre- and Post-Construction Surveys would reduce the construction vibration impacts to the maximum extent feasible.

The Life Covenant Church at 308 Maple Avenue in Torrance is approximately 450 feet from the nearest project footprint perimeter, beyond the screening distance for vibration impacts for construction (see Table 3.6-19 of the Draft EIR) and annoyance (see Table 3.6-21 of the Draft EIR). Vibration impacts would, therefore, not occur at Life Covenant Church.

129-9 The commenter's support for a project with appropriate mitigation is noted. All comments have been shared with the Metro Board for their consideration. Metro has worked diligently to develop feasible and effective mitigation measures to address the potentially significant impacts of the project and will coordinate with the Life Covenant Church during future phases of the project.

Submission 139 Barbara Graham, Torrance Refining Company

139-1 Metro acknowledges the facts listed about TORC. The comment is noted for the record. All comments have been shared with the Metro Board for their consideration.

139-2 Metro initiated coordination with TORC and TLC in 2022, prior to the release of the Draft EIR, and continues to coordinate with both parties.

The Draft EIR comprehensively addresses the potentially significant environmental impacts of the project. The presence of natural gas lines and petroleum pipelines, their potential impacts, and applicable regulatory requirements are addressed in Sections 3.9, Hazards and Hazardous Materials, and 3.11 Utilities and Service System, of the Draft EIR. Potential impacts of the LPA in this context are evaluated in Chapter 4, Evaluation of Alternatives, of the Draft EIR. In addition, Section 4.13, Corrections and Additions, of the Final EIR expands on the analysis in Section 3.9-4.2.1 of the Draft EIR by clarifying the protocols, construction techniques, regulations, and standards with which the project would comply. Also see MR-7: Utility Relocation and Hazardous Materials Safety and MR-8: Light Rail and Freight Train Safety. Section 3.1, Transportation, of the Draft EIR evaluates hazards related to geometric design and emergency access. As concluded in the Draft EIR, impacts associated with such hazards would be less than significant.

To address the specific comments raised by both TLC and TORC, Metro has refined the project footprint to minimize the area of property affected by the proposed BNSF access road. In the Draft EIR, the access road alignment extended into the TORC property. In the Final EIR, the access road has been shifted to the west such that it remains entirely outside TORC's property, and within the existing Metro ROW, except where it connects to the existing BNSF access road parallel to Del Amo Boulevard. This adjustment minimizes the encroachment, preserves access for logistics and contractor activities, and maintains TORC's security perimeter. This refinement also helps reduce construction-related nuisances by moving construction activities farther from critical refining operations and eliminates the need to relocate the TLC pipeline in this area.

This minor adjustment does not result in new or substantially more severe significant environmental impacts not already disclosed in the Draft EIR. See Chapter 3, Design Refinements, and Appendix B, Select Advanced Conceptual Engineering Drawings for the Hybrid/Locally Preferred Alternative, of the Final EIR for more details on the revised access road.

While the EIR analyzes the environmental impacts associated with construction and operation of the proposed access road, some engineering details would be finalized during the Preliminary Engineering and Final Design phases. This would include finalizing utility protection measures, construction methods, and safety coordination protocols. Design and engineering would be conducted by qualified professionals with experience designing and constructing infrastructure adjacent to active refining and pipeline facilities or equivalent. Metro would continue to closely coordinate with TORC and TLC to address site-specific operational needs, utility protection measures, and compliance with all applicable health, safety, and environmental regulations.

See MR-4: Potential Negative Health Effects Related to Noise, Vibration, and Air Quality; MR-7: Utility Relocation and Hazardous Materials Safety; and MR-8: Light Rail and Freight Train Safety for more information.

139-3 Metro initiated coordination in 2022, prior to the release of the Draft EIR, and Metro continues to coordinate with TLC and TORC. Since the Draft EIR was released, the design has been refined so that the portion of the pipeline within the refinery property would not be affected. Should the Metro Board approve the project alignment along the Metro ROW, Metro would bring on design specialists as needed, to address oil and gas utility design. See response to Comment 139-2 for more information.

With respect to the refinery's flares, according to information provided by refinery staff in a February 24, 2024 meeting, a previous study was conducted for the Del Amo Boulevard bridge extension by the City of Torrance (Risk Management Professionals, 1999). That study determined that both planned and unplanned flaring would result in radiant heat levels below allowable thresholds and would not pose a hazard to the Del Amo Boulevard bridge, which is located approximately 500 feet away from the flares. This project would be more than 1,000 feet from the flares, a distance sufficient to ensure that radiant heat would not create a hazard for the project or its passengers.

In regard to the commenter's concern about restricting vehicle turning radii, the proposed maintenance access road, as refined, would be located almost entirely outside of the refinery property and would not affect the refinery's internal access roads or the unpaved areas adjacent to them. Only a small section of the proposed access road would be on the refinery property, but it would be located in an area where there are existing BNSF tracks. As such, it is not an area typically used for vehicle turning movements. Therefore, the project would not impact refinery vehicle turning movements or emergency access needs.

Given that the proposed maintenance access road has been shifted to be almost entirely outside of the refinery property, the project would not affect future utility maintenance and access needs in that area. Although there is a small section of the proposed road remaining within the refinery property boundaries, this section of the proposed roadway would not preclude utility owners from accessing or maintaining their pipelines in this area. Furthermore, there are no pipelines within the refinery's property that would need to be relocated or modified. Therefore, there would not be construction impacts within the refinery property. Utilities within the existing railroad corridor would be relocated or protected-in-place as needed; see MR-7: Utility Relocation and Hazardous Materials Safety for more information regarding how construction around utilities would be handled.

139-4 The Draft EIR evaluates the potential for significant environmental impacts related to hazardous materials, public safety, and proximity to industrial operations in Section 3.9, Hazards and Hazardous Materials. Operation of the light rail alignment through areas with existing industrial land uses along the Metro ROW would not lead to reasonably foreseeable accidental release of hazardous materials into the environment. The project alignment has been designed to maintain appropriate setbacks, and the project includes multiple safety and security design elements, including fencing, grade separations, and access control to prevent unauthorized entry. The project would comply with relevant safety standards,

including those established by the Federal Railroad Administration (FRA), the FTA, the California Public Utilities Commission (CPUC), Metro, and BNSF Railway.

The commenter states that the refinery's tank farm is located within approximately 420 feet of the Metro ROW and the two main emergency flares are located approximately 1,000 feet from the Metro ROW, which the commenter states could cause impacts on the project. However, CEQA requires an analysis of a project's impacts to the environment and typically does not require the reverse analysis (i.e., the environment's impact on the project), unless the project itself might worsen existing environmental hazards. While the project would be located near TORC, it would not exacerbate existing industrial hazards at the refinery. Thus, an evaluation of potential emergency scenarios involving the refinery's facilities and their effects on future light rail passengers is not required under CEQA. Furthermore, Metro does not anticipate flare-related heat effects to project components or passengers at this distance. Metro would work with the refinery to coordinate emergency communication systems so that in the event of an emergency, Metro could hold or detour trains to avoid traveling near the refinery.

Metro acknowledges the request for a third-party study to assess potential impacts associated with safety, security, land use, and other impacts, and has prepared a Preliminary Hazards Analysis. As discussed in response to Comment 139-2, Metro coordinated with TORC staff in February 2024 to discuss refinery operations. Based on a previously prepared study referenced by TORC staff, Metro determined that flaring would not pose a hazard for the project or its passengers given the project's distance from the flares. Furthermore, the proposed light rail would operate on a dedicated rail alignment, with no pedestrian or bicyclist access along the tracks. Passenger access to the rail line would occur exclusively at designated stations, which are located at a significant distance from the refinery's flare system. The alignment adjacent to the refinery is grade-separated and would not introduce routine pedestrian, cyclist, or vehicular access into the immediate vicinity of the flares.

Access across the railroad corridor would still be maintained at all existing crossings, and no evacuation routes would be eliminated. The entire light rail alignment, including the portion adjacent to the refinery, would be constructed and operated in accordance with applicable safety standards, including, but not limited to, those established by Metro, FTA, FRA, and CPUC. These include appropriate emergency response protocols, setbacks, and systemwide safety planning to address coordination with local agencies in the event of emergencies. See MR-8: Light Rail and Freight Train Safety.

The project would not change the refinery's access roads and, therefore, would not affect the ability of refinery employees and contractors to vacate the area during operations.

As discussed in the response to Comment 139-2, the design of the proposed maintenance access road has been refined to minimize encroachment into the refinery property and stay within the railroad corridor. With the design refinement, only a small section of the access road would encroach into the TORC property in order to connect to an existing BNSF access road that runs parallel to Del Amo Boulevard.

139-5 As described above, the proposed BNSF access has been refined to minimize encroachment into the Refinery property and stay within the railroad corridor. The project would not alter

the refinery's existing security procedures or introduce new operational uses that would interfere with the facility's regulatory obligations. The light rail guideway would remain physically separated from the refinery site, and Metro does not propose any new public access points, facilities, or station entrances in or adjacent to TORC's secured perimeter. Furthermore, the entire light rail guideway would be enclosed by a physical barrier, such as fencing, soundwalls, or a combination of both, to prevent unauthorized access. Construction of the project would occur primarily within the existing Metro ROW, except for a small section of the proposed maintenance access road near Del Amo Boulevard. The Chemical Facility Anti-Terrorism Standards (CFATS) program requirements and statutory authority, established by the Protecting and Securing Chemical Facilities from Terrorist Attacks Act, expired in 2023. Nonetheless, Metro acknowledges both the intent of the now voluntary program, as well as the likelihood that similar requirements currently apply or may be enacted at any future date. Accordingly, Metro would continue to coordinate with TORC through future phases of the project to ensure integration, verification, and validation of required information that would assist in meeting and maintaining compliance with applicable safety and security regulations during both construction and operation of the project.

Metro also notes that while construction of the project would occur primarily within the existing Metro ROW (except for a small section of proposed maintenance access road near Del Amo Boulevard), the project's adjacency to the TORC facility would necessitate ongoing coordination of safety and security planning to ensure the refinery maintains compliance with regulatory requirements. Metro remains committed to ongoing coordination with TORC to ensure that project design and construction activities are compatible with the refinery's established security measures and do not impede the facility's compliance with applicable federal regulations.

Under CEQA, the appropriate inquiry is whether the proposed project would result in or exacerbate significant environmental impacts, including through the creation of new hazards or safety risks. See Section 3.9, Hazardous Materials, of the Draft EIR, which concludes that the project would not interfere with an adopted emergency response plan or emergency evaluation plan. The project would not impede access to evacuation or disaster routes. The project would not introduce new residential or commercial uses in proximity to the refinery, nor would it change the land use designation or affect the refinery's operations or assumptions underlying its risk management. The LPA, Trench Option, and Hawthorne Option would fully grade separate light rail from all roadways, and none of the alignments studied in the Draft EIR would significantly impact emergency access; see MR-12: Emergency Access for more information. Metro understands that TORC is required to comply with specific state and federal regulations, because of the nature of its operations. However, the project would not affect TORC's operations, including, but not limited to, the use of certain types of materials at the refinery. Furthermore, the project design was refined so that the proposed maintenance access road is outside of the property boundaries and, therefore, would not affect the ability for local agencies to respond to emergencies associated with the refinery. Metro would work with the refinery to coordinate emergency communication systems so that in the event of an emergency, Metro could hold or detour trains to avoid traveling near the refinery. Such actions are incorporated into the project as Project Feature PF-PS-1: Coordination with Torrance Refining Company and Emergency Responders and is described further in Chapter 4, Corrections and Additions, of the Final EIR.

As described in Chapter 2, Project Description, of the Draft EIR, the project would be constructed primarily within Metro's existing ROW. As described above, the proposed BNSF access road has been refined to minimize encroachment into the TORC property and stay with the Metro ROW. As a legislatively created regional transportation authority, Metro is not subject to local zoning and setback requirements when implementing a project within its legal authority (see *Rapid Transit Advocates, Inc. v. Southern California Rapid Transit District* (1986) 185 Cal.App.3d 996). Nonetheless, CEQA requires the EIR to evaluate whether the project would cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect. That analysis is provided in Section 3.2, Land Use and Planning. As discussed therein, the project would not conflict with the goals or policies of the City of Torrance General Plan or zoning provisions adopted for environmental protection purposes. Furthermore, the City of Torrance's zoning code does not dictate setback requirements from property boundaries, but rather, it defines setbacks for buildings and structures from secondary and major highways, which range from 40 to 50 feet (Torrance Municipal Code, Article 92.7.4). As shown in Appendix 2-A, Select Advanced Conceptual Engineering Drawings, of the Draft EIR, the access road would have been approximately 100 feet from the nearest structure. With the design refinement included in the Final EIR, the proposed access maintenance road would be located even farther away from any structures. Metro will continue to coordinate with the City of Torrance and TORC as the project advances to ensure safety, compatibility and access during implementation.

139-6 Metro has engaged in extensive public outreach, holding numerous meetings and community events to gather input from residents, businesses, and stakeholders. The EIR process has involved detailed analyses of environmental impacts and close coordination with multiple agencies. The environmental impacts of the project have been thoroughly evaluated, with a focus on mitigating significant impacts to the maximum extent feasible. Importantly, the Metro Board will not reach a final determination on the project until after the Final EIR is completed and released to the public. The Metro Board's decision will be based on the information gathered through the entire EIR process, including the comments on the Draft EIR and the responses to comments. The project timeline accounts for activities needed to ensure safe construction and operation of the project. An updated timeline for the LPA is included in Chapter 2, Description of the Locally Preferred Alternative, of the Final EIR.

Metro has conducted a thorough analysis of all potential environmental impacts of the project and has not rushed the process to meet any artificial deadlines. The Draft EIR reflects a good faith analysis of foreseeable impacts, including those related to the project's proximity to TORC's property and TLC's property. The project has not been "piecemealed." Instead, the Draft EIR evaluates the whole of the project, including all reasonably foreseeable future phases of the project. The commenter asserts that mitigation measures related to potential security, safety, and land use were deferred. The mitigation measures identified in the Draft EIR are not impermissibly deferred. Where it was not practical or feasible to develop all details of the mitigation measure in the Draft EIR, the mitigation measures commit Metro to implementing mitigation, identify specific performance standards that the mitigation would achieve, and identify types of actions that could feasibly achieve those performance standards. Additionally, the Final EIR was not issued until all

comments, including those from TORC, were reviewed and addressed. The Metro Board will not make a final determination on the project unless and until it certifies the Final EIR.

Submission 186 Torrance Democratic Club

186-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

186-2 See MR-17: Response to Torrance Community Letter.

186-3 The commenter's opposition to the Hawthorne Option is noted. See MR-17: Response to Torrance Community Letter.

186-4 See MR-17: Response to Torrance Community Letter.

Submission 367 Right of Say/ Redondo Beach Quality of Life Coalition

367-1 Metro recognizes that individuals with increased auditory sensitivity, such as those with sensory disorders, may be particularly affected by noise and that there are other potentially vulnerable populations, including children, seniors, and people with disabilities.

Section 3.6, Noise and Vibration, of the Draft EIR, provides a detailed and project-specific analysis of noise impacts, including their potential effects on sensitive receptors like residences, consistent with CEQA and the FTA's Transit Noise and Vibration Impact Assessment Manual (2018). Metro acknowledges that increased noise levels could contribute to stress and other health effects, as noted on page 3.6-48 of the Draft EIR.

The Draft EIR also includes several mitigation measures intended to reduce noise impacts during construction and operation of the project, including Mitigation Measure MM-NOI-1: Noise Control Plan to reduce noise levels generated by construction to below the FTA construction noise criteria to the maximum extent feasible, Mitigation Measure MM-NOI-2: Soundwalls to minimize operational noise impacts along impacted segments of the Metro ROW, Mitigation Measure MM-NOI-3: Low Impact Frogs to reduce wheel noise and rail crossovers, and Mitigation Measure MM-NOI-4: Quiet Zone Establishment to establish a "quiet zone" along the Metro ROW from north of Inglewood Avenue to south of 182nd Street, to prevent routine sounding of freight horns. With the establishment of a quiet zone, freight train noise along the Metro ROW would be reduced, overall, compared to current conditions. The potential for LPA impacts is addressed in Chapter 4, Evaluation of Alternatives, of the Draft EIR. See MR-3: Operational Noise Project Features and Mitigation Measures.

It is not technically feasible to correlate project-specific noise impacts to specific health outcomes, given the complexity of factors contributing to these conditions. However, with implementation of the proposed mitigation measures, noise levels associated with construction and operation of the project would be reduced. See MR-4: Potential Negative Health Effects Related to Noise, Vibration, and Air Quality.

367-2 Section 4-24.301 of the Redondo Beach Municipal Code, cited by the comment, sets forth presumed ambient noise standards for residential zones. Metro is not subject to local zoning ordinances, a fact reflected in the Redondo Beach Municipal Code. Section 4-24.604 of the Redondo Beach Municipal Code specifies that the provisions of Section 4-24.301, cited by the comment, do not apply to any activity that is preempted by state or federal law. The project is preempted from local zoning ordinances (see *Rapid Transit Advocates, Inc. v. Southern California Rapid Transit District* (1986) 185 Cal.App.3d 996). Therefore, the standards cited by the comment do not apply.

As noted above, the Draft EIR evaluates operational noise impacts in accordance with the FTA Transit Noise and Vibration Impact Assessment Manual (2018), which is the applicable and industry-accepted standard for evaluating transit noise impacts. The FTA methodology relies on Ldn (day-night average sound levels), which includes a 10-dBA (A-weighted decibel) nighttime penalty to account for increased sensitivity to nighttime noise. This method allows for a cumulative, 24-hour evaluation of project-related noise and is specifically designed for transit projects like this one. By the very nature of the FTA thresholds, which are based on existing noise levels, a less than significant impact is within the allowable level of noise that would not cause a substantial increase in noise to the community. Although, as noted in Section 4-24.604 of the Redondo Beach Municipal Code, Section 4-24.301 does not apply to the project, Metro recognizes the importance of addressing community concerns regarding nighttime noise. Accordingly, Metro has undertaken a comprehensive analysis of both construction and operational noise impacts in accordance with FTA standards and regulatory best practices, and has committed to implement stringent, enforceable noise mitigation to minimize potential disturbance to nearby residents. It is also important to clarify that the Redondo Beach Municipal Code thresholds cited by the commenter represent presumed ambient levels, which are not fixed limits on all noise-generating activity and may be exceeded by existing conditions. In cases where the existing measured noise level is higher than the presumed ambient noise level, then that becomes the exterior noise threshold.

The Draft EIR and Final EIR conclude that with implementation of mitigation measures, including MM-NOI-2: Soundwalls, MM-NOI-3: Low Impact Frogs, and MM-NOI-4: Quiet Zone Establishment [for the ROW alignments], operational impacts of the LPA, the Trench Option, and the Hawthrone Option would not exceed the FTA operational noise thresholds. Only the Elevated/At-Grade Alignment would have a significant and unavoidable impact, caused by the necessary gap in the soundwall for vehicle access and the need for warning devices at the at-grade crossing near 170th Street.

See also MR-2: Operational Noise Analysis Methodology and Impact Thresholds and MR-3: Operational Noise Project Features and Mitigation Measures.

367-3 The Draft EIR's operational noise analysis follows the Detailed Noise Analysis Procedure per the FTA's Transit Noise and Vibration Impact Assessment Manual (2018). The Detailed Noise Analysis Procedure evaluates all relevant light rail sources of noise, including light rail pass-bys, traction power substations (TPSS), special trackwork, and warning devices at crossings. The analysis also considers mitigation measures, such as soundwalls. The commenter expresses concern that the proposed soundwalls may worsen noise conditions on the west side of the Metro ROW, especially where the freight track would be shifted closer to homes.

The noise analysis explicitly accounts for this potential and incorporates the reflective properties of standard soundwalls and their effect on sensitive receptors. Where reflective noise could potentially increase impacts to nearby receptors, absorptive soundwalls, which minimize reflected noise, have been recommended to reduce noise levels to below the FTA noise criteria.

As shown on page 3.6-53 of the Draft EIR, soundwalls are proposed along both the west and east sides of the Metro ROW, from immediately south of the 182nd Street crossing to Inglewood Avenue. These barriers are designed to reduce noise for sensitive receptors on both sides of the corridor, including those adjacent to the relocated freight track. As noted, reflective noise would be addressed through absorptive soundwalls where necessary to ensure noise levels do not exceed the FTA noise criteria.

The FTA noise standards used in the analysis are based on exterior noise levels, meaning that impacts were evaluated without assumed closed windows or air conditioning. See MR-2: Operational Noise Analysis Methodology and Impact Thresholds.

367-4 See response to Comment 367-3.

367-5 Noise monitoring was conducted at locations 17, 18, and 23 in the City of Redondo Beach, as shown in Figure 3.6-7 of the Draft EIR. Noise monitoring location 23 is specifically on the west side of the Metro ROW. These measurements were conducted in accordance with the FTA Transit Noise and Vibration Impact Assessment Manual (2018), which permits the use of representative measurements to establish existing noise levels for areas with similar existing noise conditions. See MR-2: Operational Noise Analysis Methodology and Impact Thresholds.

367-6 To clarify, the establishment of a quiet zone, as described in Project Feature PF-NV-1: Quiet Zone Equipment Establishment and Mitigation Measure MM-NOI-4: Quiet Zone Establishment, pertains to eliminating freight horn noise at crossings and is not related to light rail noise or the project features (PF-NV-2: Crossing Signal Bell Shroud and PF-NV-3: Gate-Down-Bell-Stop-Variance) referenced in the comment. Project Features PF-NV-2: Crossing Signal Bell Shroud and PF-NV-3: Gate-Down-Bell-Stop-Variance specifically address noise from crossing signal bells near light rail at-grade crossings, (170th and 182nd Streets for the Elevated/At-Grade Alignment) but are not part of a quiet zone designation. Noise generated by light rail pass-bys would be mitigated through Mitigation Measures MM-NOI-2: Soundwalls and MM-NOI-3: Low Impact Frogs.

Like the Trench Option, the LPA significantly reduces noise impacts compared to the Elevated/At-Grade Alignment, because it eliminates the at-grade crossings at 170th and 182nd Streets. Likewise, the Hawthorne Option would fully grade separate the light rail. By grade-separating the light rail from all roadways, the LPA, the Trench Option, and the Hawthorne Option avoid the need for audible warning at light rail crossings, such as routine light rail train horns and crossing bells.

If the Elevated/At-Grade Alignment were implemented, the addition of the light rail crossing at 182nd Street would increase the frequency of the crossing gate down time relative to existing conditions but would not permanently close emergency access. All of the homes

and businesses on either side of the 182nd Street crossing would remain accessible by alternate routes within a half-mile that have grade-separated crossings and are, therefore, not affected by train frequency. While McCormick Ambulance Services currently operates near the 182nd Street at-grade crossing, McCormick, as a private business, is not restricted to this location and could adjust its base location if future needs arise. Any such relocation of McCormick Ambulance Services, or a similar private business, would likely occur within already developed commercial or industrial properties, involving leasing or minor modifications to existing structures rather than new construction and would utilize existing infrastructure.

The LPA, the Trench Option, and the Hawthorne Option, which would fully grade separate the light rail from all roadways, would eliminate any potential impacts of the light rail on emergency response time. See MR-12: Emergency Access.

367-7 See response to Comment 367-2. Metro, as the CEQA Lead Agency, has the responsibility to determine the appropriate criteria for the project and has utilized the FTA's noise impact criteria, which was specifically developed to address transit noise based on well-documented criteria and research on human response to community noise.

Additionally, see MR-2: Operational Noise Analysis Methodology and Impact Thresholds. As discussed therein, application of the FTA criteria contrasts with the "brightline" operational noise thresholds used by many local jurisdictions, which set fixed operational limits without considering existing noise levels, and in many cases, these city thresholds have already been exceeded by existing conditions. For instance, the maximum presumed ambient noise level standards established by Redondo Beach Municipal Code Section 4-24.301 for uses considered sensitive receptors range from 45 dBA for Low Density uses to 60 dBA for Residential R-5 and R-6 uses. However, as detailed in Table 3.6-17 of the Draft EIR, existing noise levels at the majority of sensitive receptor clusters in proximity to the Trench Option already exceed the foregoing maximum presumed ambient noise level standards. Thus, Metro's application of the FTA criteria to evaluate the potential for project construction and operational activities to result in substantial temporary or permanent increases in ambient noise levels is more applicable than simply assessing whether project noise levels would exceed local standards.

367-8 The commenter's preference for the Hawthorne Option followed by the High-Frequency Bus Alternative is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 399 Right of Say/ Redondo Beach Quality of Life Coalition

399-1 The commenter's observation that the City of Lawndale has a high population density and limited park space relative to other South Bay cities is noted. All comments have been shared with the Metro Board for their consideration. Under CEQA, population density and park acreage are not treated as environmental impacts, in and of themselves. However, the Draft EIR considers whether the project would result in physical environmental effects related to the availability of park space. As discussed in Section 3.15, Public Services, of the Draft EIR, Section 3.15-4.5, the project would not result in the direct removal or degradation of parks facilities in the City of Lawndale or elsewhere. The project is also not expected to

increase the use of existing parks in a way that would result in physical deterioration or require the construction or expansion of recreational facilities. Therefore, the Draft EIR concludes that the project would have a less than significant impact related to parks.

399-2 See response to Comment 399-1. Although Metro understands that some residents use the freight corridor for informal recreational activities, this use is not authorized and is not compliant with freight safety standards. The Metro ROW is not a park, but rather an active freight corridor. The use of the Metro ROW for recreation is not sanctioned and does not constitute a designated public resource under CEQA.

To enhance recreational opportunities, the project would include two multi-use recreational paths and new landscaping in areas where space allows, providing safe and accessible amenities for the community. Within Lawndale, the path would be provided between 159th and 170th Street on the west side of the freight tracks. The planned multi-use paths are designed to provide a safe and accessible environment for walking, jogging, and bicycling, and they represent an improvement over current conditions, including in Lawndale where dedicated recreational infrastructure is limited.

Additionally, in 2022, Metro adopted a Metro Tree Policy which outlines Metro's commitment to protecting trees, when possible, and replacing those that must be removed as a result of Metro construction and maintenance. For non-heritage trees, the policy specifies a replacement ratio of two trees for every tree removed. Metro's policy prioritizes planting strategies that maximize the use of native species, thereby enhancing the local ecosystem. See MR-10: Changes to Community Character.

399-3 The commenter's opposition to the Metro ROW alignments is noted. See MR-10: Changes to Community Character.

399-4 While change in community character does not constitute a significant impact under CEQA, Section 3.2, Land Use, and Section 3.3, Aesthetics, of the Draft EIR analyzes the project's potential to physically divide communities and to affect visual quality and character. The potential for LPA impacts is addressed in Chapter 4, Evaluation of Alternatives, of the Draft EIR. A physical divide to an established community means a physical division, such as the construction of a new barrier that severs access between neighborhoods. The Metro ROW alignments would be constructed within an existing transportation corridor, rather than previously undisturbed areas. As discussed in the Draft EIR, the presence of the Elevated/At-Grade Alignment would not physically divide a community, because residents would still be able to cross the Metro ROW at all existing designated rail crossings located at Inglewood Avenue, Manhattan Beach Boulevard, 159th, 160th, 161st, 162nd, 170th, and 182nd Streets. Land uses would not be altered such that any one part of the community would be isolated from the other. Operation of the LPA, Trench Option, and Hawthorne Option have even less potential to physically divide an existing community, because each would fully grade separate the light rail from all roadways. Construction would occur in phases, so not all disruptions would happen at once, reducing the potential to divide communities. A CTMP would be implemented to maintain access for vehicles, pedestrians, and cyclists throughout all phases, consistent with Metro's standard practices. For these reasons, the Draft EIR concludes construction and operation of the Elevated/At-Grade Alignment and Trench Option would not physically divide an established community, and the impacts would be

less than significant. The Hawthorne Option would similarly result in a less than significant impact during project operation and would result in a less than significant impact during construction with implementation of Mitigation Measure MM-LU-1: Temporary Crossings. MM-LU-1: Temporary Crossings requires a nearby temporary alternate crossing where the closure of crosswalks or other pedestrian roadway crossings and an alternate crossing route do not exist within 1,000 feet of the closed crossing. See also response to Comment 399-2 and MR-10: Changes to Community Character.

399-5 The presence of natural gas lines and petroleum pipelines, their potential impacts, and applicable regulatory requirements are addressed in Sections 3.9, Hazards and Hazardous Materials, and 3.11 Utilities and Service System, of the Draft EIR. Potential impacts of the LPA in this context are evaluated in Chapter 4, Evaluation of Alternatives, of the Draft EIR. In addition, Section 4.13, Corrections and Additions, of the Final EIR expands on the analysis in Section 3.9-4.2.1 of the Draft EIR by clarifying the protocols, construction techniques, regulations, and standards with which the project would comply. The project would not introduce ground movement that would exceed tolerances for underground infrastructure. For more information on this topic, see MR-7: Utility Relocation and Hazardous Materials Safety. For additional background, see MR-8: Light Rail and Freight Train Safety and MR-13: Soil Stability and Sinkholes.

399-6 William Green Elementary School is correctly identified in Table 3.15-9 on page 3.15-21 of the Draft EIR as being 0.13 miles (686 feet) from the Metro ROW. The commenter may be referring to William Green Park, which is utilized by the school for recreational activities and is located 350 feet from the Metro ROW at its closest point and 686 feet from the Metro ROW at its farthest point.

Construction activities would not require the acquisition of any public facilities, including educational facilities. Roadways that intersect the alignment would need to be temporarily closed or have lanes reduced to accommodate construction activities, which could impede the vehicle circulation network, though traffic would be detoured to a parallel route (for example, with a closure at 170th Street, all traffic would detour to 162nd Street or Artesia Boulevard). Construction activity would be limited to the Metro ROW and staging areas and would not result in direct physical impacts to any school. Additionally, access to the schools would be maintained during construction, and detour routes would be included pursuant to Project Feature: PF-T-1: Construction Traffic Management Plan (see Section 3.1, Transportation, of the Draft EIR). Therefore, construction activities would not result in the need for new or physically altered educational facilities, and this impact would be less than significant.

The project would not increase the demand for school facilities, requiring the provision of new or expanded educational facilities. Operation of the project would indirectly increase local access to educational facilities. However, it is anticipated that students and faculty would remain within their associated school districts, and an increase in attendance would not occur as a result of the project. Additionally, the project is included in the Southern California Association of Governments (SCAG) 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) as a planned transit project and is, thus, factored into demographic forecasts for future population, household, and employment growth for the cities of Lawndale, Hawthorne, Redondo Beach, and Torrance. Accordingly,

the project would not induce unplanned population growth that would impact the demand for school facilities. Therefore, no impact would occur.

399-7 See response to Comment 399-4.

399-8 The project would add new safety fencing or other barriers, such as soundwalls, to the Metro ROW. However, access across the railroad corridor would still be maintained at all existing crossings, and no evacuation routes would be eliminated.

399-9 In the previous planning stage (2018 Supplemental Alternatives Analysis), Metro studied proposed stations in the City of Lawndale, between Inglewood Avenue and Manhattan Beach Boulevard along the Metro ROW, and at Hawthorne Boulevard/166th Street. However, at the request of the City of Lawndale, Metro removed these proposed stations from further study. Metro is adhering to all CEQA requirements. Furthermore, Metro's design and planning process complies with all applicable safety regulations. See MR-8: Light Rail and Freight Train Safety.

399-10 The commenter's support for the Hawthorne Option is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

399-11 The comment is noted for the record.

Submission 403 Craig St. John, Westwood Building Materials

403-1 The property identified by the commenter is identified as a potential location for a TPSS, as well as for a sump pump for the Trench Option. The Hybrid Alternative was selected by the Metro Board as the LPA, which would not require a sump pump and/or a TPSS on that property. See MR-1: Selection of Alternatives. The Draft EIR evaluated multiple options for the TPSS locations, which would be determined in the next phase of design.

403-2 The commenter's preference for an overhead design configuration of the Metro ROW alignments at Inglewood Avenue and Manhattan Beach Boulevard is noted. See MR-1: Selection of Alternatives.

403-3 Approximately 178 residential properties are located immediately adjacent to the Metro ROW, and 22 residential properties are located immediately adjacent to the Hawthorne Option. Metro has designed the project to avoid displacement of residents.

Submission 404 Craig St. John, Westwood Building Materials

404-1 See response to Comment 403-3 related to residences located adjacent to the project. Of the alignments studied in the Draft EIR, only the Elevated/At-Grade Alignment would result in a significant and unavoidable operational noise impact. Operational noise impacts associated with the Trench Option, Hawthorne Option, and the LPA would be reduced to less than significant with mitigation. None of the alignments analyzed in the Draft EIR would result in a significant and unavoidable operational vibration impact. Metro understands concerns regarding property values. However, under CEQA, economic impacts such as changes in property values are not considered environmental impacts. The Draft EIR focuses on physical environmental impacts and measures to mitigate them, as required by CEQA. To

address questions and concerns on property values, Metro has prepared more information. See MR-14: Property Values and Impacts to Businesses.

404-2 See response to Comment 403-3.

Submission 405 Craig St. John, Westwood Building Materials

405-1 Submission 404 includes the same comments from the same commentor. See responses to Comment Letter 404.

Submission 435 Daniel Walker, Friends of Green Line

435-1 The commenter's support for the project is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

435-2 The terminus station at the Torrance Transit Center would allow the line to continue further south, should funding and approvals become available. Any future extensions would be subject to their own environmental review and planning processes. Potential extensions from the Torrance Transit Center to San Pedro, Long Beach, and the Los Angeles County/Orange County line are included in the unfunded portion of the 2009 Metro Long Range Transportation Plan.

435-3 The commenter's support of the Elevated/At-Grade Alignment is noted. The Metro Board selected an LPA located in the Metro ROW. Before making a final determination on the project, the Metro Board will review the comments and responses included in the Final EIR and will consider multiple factors, including environmental impacts, benefits, and costs.

435-4 The 2023 Ridership Summary Report, published concurrently with Draft EIR, shows that the project is expected to generate between 11,500 to 15,600 daily transit trips (boardings). Ridership levels vary by alignment, as discussed in the report. However, travel times are similar between all alignment options.

435-5 The commenter's opposition to the Trench Option is noted. All comments have been shared with the Metro Board for their consideration. Both the LPA and the Trench Option significantly reduce noise impacts compared to the Elevated/At-Grade Alignment, because they eliminate the at-grade light rail crossings at 170th and 182nd Streets. By grade-separating the light rail from all roadways, the LPA and the Trench Option remove the need for audible warning at light rail crossings, such as routine train horns and crossing bells. As described in Chapter 4, Evaluation of Alternatives, of the Draft EIR, and Section 4.20, Corrections and Additions, of the Final EIR, operational noise impacts of the LPA would be comparable to those of the Trench Option and would be less than significant with mitigation.

Regarding freight train noise, the alignment options along the Metro ROW, including the LPA and Trench Option, would include Project Feature PF-NV-1: Quiet Zone Equipment Installation and Mitigation Measure MM-NOI-4: Quiet Zone Establishment, which are expected to reduce freight noise compared to existing conditions. See MR-3: Operational Noise Project Features and Mitigation Measures.

435-6 The commenter's support for the alignment along the Metro ROW is noted. All comments have been shared with the Metro Board for their consideration. As correctly noted by the comment, light rail vehicles are electrically powered and generally operate more quietly than diesel-powered trains. As indicated by the commenter, improvements to the relocated freight tracks under the Metro ROW assignments are anticipated to reduce noise and vibration from freight operations. Furthermore, the Metro ROW alignments include Project Feature PF-NV-1: Quiet Zone Equipment Installation and Mitigation Measure MM-NOI-4: Quiet Zone Establishment, which would reduce freight noise compared to existing conditions by enabling the establishment of a quiet zone with the FRA, which would eliminate the routine use of train horns along this portion of the Metro ROW. Once all necessary safety measures are installed, the quiet zone may qualify for automatic approval under federal regulations (49 CFR 222). See MR-19: Project Benefits for additional information.

435-7 The project schedule will continue to be updated as refinements to the design, project cost estimates, and funding plan. While offering financial incentives to construction contractors for early completion is worth considering, accelerating the project would present significant challenges. These include securing additional funds, expediting the procurement process, coordinating condensed review and permit approvals from public and private entities, and managing an intensive, compressed construction period. Each of these elements requires careful planning to ensure that safety, environmental regulations, and community impacts are appropriately addressed. Metro remains committed to delivering the project as efficiently as possible while balancing the need to control costs and ensure compliance with all necessary approvals.

435-8 Before making a final determination on the project, the Metro Board will review the comments and responses included in the Final EIR and will consider multiple factors, including funding availability, costs, implementation efficiency, stakeholder input, and environmental impacts. All options and alternatives remain under consideration until the Metro Board takes final action on the project and its Final EIR. The project has secured funding from Measure R (2008), Measure M (2016), Transit and Intercity Rail Capital Program (TIRCP) Grant from the California State Transportation Agency Transit and Intercity Rail Capital Program, and 3% match contributions from local jurisdictions. Metro remains committed to the responsible use of public funds and to managing project costs efficiently, while continuing to pursue additional funding sources to support project delivery.

435-9 The project would provide a one-seat ride from Torrance to the Los Angeles International Airport (LAX) and operate as part of the Metro K line in a north-south pattern with connections to the Metro C Line, which travels east-west and provides access to Norwalk.

435-10 The commenter's support for safety enhancements to support a quiet zone is noted. All comments have been shared with the Metro Board for their consideration. The establishment of quiet zones, which eliminate the use of train horns, is governed by the FRA, not the CPUC. See response to Comment 435-6.

435-11 The proposed stations are intended to enhance regional transportation multi-modal mobility and access. The project includes two multi-use recreational paths to enhance pedestrian and bicycle connectivity. Bicycle parking would be provided at all stations. While

Metro assists in identifying potential First/Last Mile improvements during the planning and design phases, the implementation of off-site access improvements falls under the jurisdiction of the local cities. If the project is approved, Metro would coordinate with the local jurisdictions to assist in this planning.

435-12 The commenter's support for a station in Lawndale is noted. All comments have been shared with the Metro Board for their consideration. In the previous planning stages, stations were proposed in Lawndale, including as part of the 2018 Supplemental Alternatives Analysis, but at the request of the City of Lawndale were removed from consideration.

435-13 The commenter's support for the project related to regional access and environmental/community benefits is noted.

435-14 See response to Comment 435-13.

Submission 453 Ed Romero, Marathon Pipe Line LLC

453-1 Metro acknowledges the location of pipelines 217A and 088C and the request not to dig within 50 feet of the identified locations without coordinating with Marathon Petroleum. Section 3.11, Utilities and Service Systems, of the Draft EIR evaluates potential impacts associated with utility conflicts. As described on page 3.11-10 of the Draft EIR, the project includes Project Feature PF-US-1: Utility Identification and Coordination, which would ensure that the locations of all utilities potentially affected by project activities are verified prior to construction. This includes conducting detailed field verification methods, such as potholing, to confirm the horizontal and vertical alignment of pipelines and other utilities. The information obtained through this process would be used in coordination with utility owners, including Marathon Pipeline, to determine appropriate measures to either protect utilities in place or relocate them as necessary. Metro would coordinate with Marathon Pipeline and Dig-Alert to provide notice prior to any excavation activities. See MR-7: Utility Relocation and Hazardous Materials Safety.

Submission 752 Mark Navarra, Jerome's Furniture

752-1 The commenter's support for the Metro ROW alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

752-2 The commenter's opposition to the Hawthorne Option is noted. See MR-1: Selection of Alternatives. Under CEQA, economic effects, such as financial effects on businesses, are not considered environmental effects. Metro has created a Business Interruption Fund for major rail projects under construction in Los Angeles County to support the business community.

Submission 1958 Right of Say

1958-1 Freight rail operations, including transportation of hazardous materials, are regulated by the FRA and must comply with stringent federal regulations related to the handling, labeling, and transport of hazardous substances. The project would not alter or increase the frequency of freight operations or the types of materials transported along the corridor. Nonetheless, Metro is committed to integrating safety into all Metro rail operations,

including designing and operating the project to ensure compatibility alongside freight operations. The project would comply with relevant safety standards, including the California Manual on Uniform Traffic Control Devices, the California Department of Transportation Highway Design Manual, and Metro's Grade Crossing Safety Policy. For more information, see MR-8: Light Rail and Freight Train Safety.

1958-2 The project under consideration is a light rail transit line to be operated by Metro, not a heavy rail line like those operated by Metrolink or freight rail operated by BNSF. Light rail vehicles are quieter, electrically powered trains that generate less noise and vibration compared to larger, diesel operated Metrolink trains and freight operators. As discussed in Section 3.6, Noise and Vibration, subsection 3.6-4.3.2, impacts associated with operation of the light rail and freight would be reduced to less than significant with mitigation. With respect to building damage during construction, Mitigation Measure MM-VIB-3: Pre- and Post-Construction Surveys requires contractors to document damage resulting from vibration impacts during construction and repair them. In addition, as discussed in Section 3.8, Geology and Soils, of the Draft EIR, the project design process would include thorough site geotechnical investigations to ensure the stability of nearby structures. Per Project Feature PF-GEO-1: Metro Geotechnical Design Standards, preconstruction site-specific geotechnical investigations would be conducted to address foundation and structural safety. The investigation would include engineering and construction recommendations to ensure surrounding structures are not damaged. These recommendations would be a product of and confirmed during final design and address potential subsurface hazards. See also MR-7: Utility Relocation and Hazardous Materials Safety and MR-13: Soil Stability and Sinkholes.

1958-3 The Final EIR includes updates to the construction duration for the LPA, which is estimated to take approximately six years to construct. Construction-related activities would proceed in phases, limiting the duration of any impacts at a given location. See MR-21: Cost Estimates and Schedule. Additionally, existing vibration levels along the stretch of the Metro ROW proposed for the Elevated/At-Grade Alignment, Trench Option, and LPA are generated through freight rail operations, not light rail transit. Metro would install new and upgraded rail infrastructure, wherever physically feasible, where freight tracks would be relocated, which would help reduce existing freight vibration levels. The project would also include implementation of Mitigation Measure MM-VIB-4: Low Impact Frogs, MM-VIB-5: Resilient Fasteners, and MM-VIB-6: Ballast Mats, which would ensure potential operational vibration impacts are reduced to a less than significant level.

1958-4 The commenter generally mentions "well documented" studies regarding geological conditions. Although specific studies were not cited by the commenter, Metro has received comments from other submissions regarding the South Bay Galleria EIR and a Ninyo & Moore study. The South Bay Galleria EIR describes the same regional geologic conditions as those presented in the Draft EIR. The South Bay Galleria EIR also describes findings from a geotechnical report that is specific to the Galleria site. While the Galleria's geotechnical report findings would not apply to this project, they recommend similar design and construction methods to those Metro would implement, such as excavating poor soils and replacing them with engineered fill in accordance with building code requirements. Regarding the Ninyo & Moore study, the information on soil conditions is consistent with the types of soils identified in Section 3.8 of the Draft EIR, as well as with the 2023

Geotechnical Data Report, which supports the Draft EIR engineering plans and includes a review of past geotechnical investigations conducted within the project area.

Additionally, the soil types described by the commenter are generally consistent with Metro's understanding of existing conditions, as discussed in Section 3.8, Geology and Soils, of the Draft EIR. These soils are common throughout Los Angeles County and are not unique to the project area. There are no unstable or seismically hazardous conditions along the corridor that would preclude safe construction or operation of the project. See MR-13: Soil Stability and Sinkholes and responses to Comments 1958-2 and 1958-5.

1958-5 As described in Section 3.6, Noise and Vibration, of the Draft EIR, the FTA has defined vibration thresholds for human annoyance and structural damage. As shown in Table 3.6-6 of the Draft EIR, the threshold for vibration annoyance is 65 vibration decibels, for "frequent events." The threshold for construction vibration damage is shown in Table 3.6-5 of the Draft EIR, which expresses vibration in terms of peak particle velocity inches per second. The analysis in the Draft EIR evaluates construction vibration impacts based on these established thresholds. For operational vibration impacts, vibration impacts are assessed in terms of human annoyance, as building damage thresholds are much greater than annoyance thresholds and are typically limited to construction activities, which generate higher peak vibration levels than freight or light rail trains. See MR-7: Utility Relocation and Hazardous Materials Safety.

1958-6 The commenter's interpretation of the vibration data is inaccurate. Vibration levels were elevated at the El Nido Park measurement location for both northbound and southbound trains, indicating that the observed levels were not solely attributable to variations in train weight. For both loaded and unloaded trains, the highest vibration levels typically occurred with the passage of the locomotive, which is generally the heaviest part of the train.

As described on page 3.6-28 of the Draft EIR, the FTA general assessment methodology does not require vibration measurements. Vibration measurements were primarily conducted to collect samples of vibration generated by the existing freight train pass-bys and not as a requirement to prepare the analysis. As described on page 3.6-31 of the Draft EIR, where higher vibration propagation was predicted compared to the predicted vibration levels, adjustments were made to calibrate the model such that it reflected higher vibration levels in the vicinity of El Nido Park.

See response to Comment 1958-2 regarding vibration mitigation and vibration effects related to annoyance and damage during operations.

The commenter's support for the Hawthorne Option is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives. However, the assertion that the Hawthorne Option is necessary to reduce impacts related to hazardous and hazardous materials to less than significant is mistaken. See MR-8: Light Rail and Freight Train Safety.

Submission 1967 Right of Say

1967-1 Metro is committed to integrating safety into all Metro rail operations, and all project components would be designed and operated in compliance with applicable federal, state,

and Metro safety standards, including those governing the transport of hazardous materials. The presence of natural gas lines and petroleum pipelines, their potential impacts, and applicable regulatory requirements are addressed in Sections 3.9, Hazards and Hazardous Materials, and 3.11 Utilities and Service System, of the Draft EIR. Potential impacts of the LPA in this context are evaluated in Chapter 4, Evaluation of Alternatives, of the Draft EIR. In addition, Section 4.13, Corrections and Additions, of the Final EIR expands on the analysis in Section 3.9-4.2.1 of the Draft EIR by clarifying the protocols, construction techniques, regulations, and standards with which the project would comply. As noted in Section 3.11, Utilities and Service Systems, the project includes Project Feature PF-US-1: Utility Identification and Coordination, which requires Metro to confirm the locations of all underground utilities in advance of construction and to closely coordinate with pipeline operators to avoid conflicts and implement protection-in-place or relocation procedures consistent with modern safety standards. It is expected that pipeline relocations could be accommodated within the existing Metro ROW, with the exact configuration, including any needed design variances, to be determined as design advances with safety as the key priority. Regarding the potential for vibration-related impacts to underground pipelines, see MR-7: Utility Relocation and Hazardous Materials Safety.

Regarding the concern about petroleum tankers operating adjacent to light rail and residential communities, the project would not increase the frequency or type of freight traffic, including hazardous materials, which continues to be regulated by the FRA and the U.S. Department of Transportation under the Hazardous Materials Transportation Act, discussed in Section 3.9-1.1 of the Draft EIR. Freight service is an existing condition and is subject to federal safety standards regardless of the project.

The Elevated/At-Grade Alignment, Trench Option, and LPA are designed to safely accommodate light rail, freight rail, and necessary separation distances with the ROW, and informed by modern design standards for track layout, elevated structures, and emergency access. There is sufficient space for the proposed light rail and freight track within the Metro ROW. See Appendix 2-A, Select Advanced Conceptual Engineering Drawings, of the Draft EIR and Final EIR Appendix B, Select Advanced Conceptual Engineering Drawings for the Hybrid/Locally Preferred Alternative, for more details. See also MR-8: Light Rail and Freight Train Safety.

1967-2 See response to Comment 1967-1.

5.5 RESPONSES TO INDIVIDUAL COMMENTS (SUBMISSION #1- #337)

Submission 1 Erin Hoops

1-1 The commenter's support for the Trench Option is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives and MR-4: Potential Negative Health Effects Related to Noise, Vibration, and Air Quality.

Submission 2 Johnny Menhennet

2-1 The commenter's support for the Hawthorne Option is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives. Metro studied another station option in Lawndale in the 2018 Supplemental Alternatives Analysis but removed the option from further study at the request of the City of Lawndale.

Submission 3 Kyle Freitas

3-1 The commenter's support for a below-grade alignment along the Metro ROW (called Alternative 1 during public scoping and the Trench Option within the Draft EIR) is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

3-2 As described in Chapter 2, Project Description, and Section 3.6, Noise and Vibration, of the Draft EIR, all Metro ROW alignments include multi-use recreational paths along a portion of the alignment in Lawndale, as well as soundwalls in areas where noise mitigation is proposed. As discussed in Chapter 4, Evaluation of Alternatives, of the Draft EIR, the LPA also includes multi-use recreational paths and soundwalls.

Submission 4 Robert Kessmar

4-1 The commenter's support for the Hawthorne Option is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

4-2 The comment that the Trench Option would provide a more constrained visual experience for passengers compared to aerial or at-grade alignments is noted. However, passenger experience is not an environmental impact under CEQA and therefore is not evaluated in the Draft EIR. Under CEQA, the analysis of aesthetic impacts focuses on changes to views from publicly accessible locations. Furthermore, as the project is located in an urbanized area, the analysis in Section 3.3, Aesthetics, of the Draft EIR, evaluates whether the project would conflict with applicable zoning or other regulations governing scenic quality. Based on the detailed analysis, set forth on pages 3.3-55 through 3.3-114 of the Draft EIR, including visual simulations, the Draft EIR concludes that none of the alignment options would conflict with applicable policies or regulations governing scenic quality. The cost estimates published in 2023 (estimated in 2022) with the Draft EIR are as follows: Elevated/At-Grade Alignment ($1.96B), Trench Option ($2.84B), Hawthorne Option ($2.96B), and LPA ($2.23B). See MR-21: Cost Estimates and Schedule.

4-3 The commenter's support for an elevated alignment is noted. All comments have been shared with the Metro Board for their consideration. All alignment options studied have some portion of the light rail track that is elevated, as described in Chapter 2, Project Description, of the Draft EIR. The LPA would be elevated between the Redondo Beach (Marine) Station to 162nd Street, where it begins to transition to at-grade. See MR-1: Selection of Alternatives.

Submission 5 Leslie Andrew Ridings

5-1 The commenter's support for the Trench Option, which would be fully grade-separated, is noted. All comments have been shared with the Metro Board for their consideration. The LPA would also fully grade separate light rail from all roadways. See MR-1: Selection of Alternatives.

5-2 The commenter's support for the Redondo Beach Transit Center Station is noted. All comments have been shared with the Metro Board for their consideration. See MR-15: Metro Ridership Forecasting Methodology.

Submission 6 Joseph Guay

6-1 The commenter's opposition to the project is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

6-2 The 2023 Ridership Summary Report, published alongside the Draft EIR, shows that the project is expected to generate between 11,500 to 15,600 daily transit trips (boardings). See MR-9: Light Rail Security and MR-15: Metro Ridership Forecasting Methodology.

Submission 7 Joanna G

7-1 Metro has worked diligently to develop feasible and effective mitigation measures to address the potentially significant environmental impacts of the project. See MR-10: Changes to Community Character and MR-19: Project Benefits.

Submission 8 can be found in Section 5.4 Responses to Groups and Organizations

Submission 9 MJ Anderson

9-1 The commenter's support for the Metro ROW alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

9-2 As described in Chapter 2, Project Description, of the Draft EIR, the Metro ROW alignments include a multi-use recreational path between Grant Avenue and 182nd Street on the east side of the light rail tracks, which enhance access between the Redondo Beach Transit Center to the South Bay Galleria. Metro would continue to coordinate with the South Bay Galleria in future phases of design regarding pedestrian access.

During the Green Line Extension to Torrance 2018 Supplemental Alternatives Analysis, Metro studied potential stations in the City of Lawndale between Inglewood Avenue and

Manhattan Beach Boulevard along the Metro ROW and along Hawthorne Boulevard at 166th Street. At the request of the City of Lawndale, the Metro Board of Directors (Metro Board) agreed to remove the proposed stations in Lawndale from further study.

Submission 10 Mary Ellen Martin

10-1 The commenter's opposition to the Metro ROW alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives. The potential for noise impacts is addressed in Section 3.6, Noise and Vibration, of the Draft EIR. The potential for LPA impacts is addressed in Chapter 4, Evaluation of Alternatives, of the Draft EIR. See MR-2: Operational Noise Analysis Methodology and Impact Thresholds, MR-3: Operational Noise Project Features and Mitigation Measures, and MR-4: Potential Negative Health Effects Related to Noise, Vibration, and Air Quality.

10-2 See response to Comment 10-1. The commenter's concerns regarding the decision-making process are noted. Metro values public input and has not made a final decision on the project. The Metro Board will consider the Final EIR, along with public comments and input received throughout the environmental review process, before deciding whether to certify the Final EIR and approve the project. That decision is anticipated in 2025.

10-3 The Draft EIR evaluated the Hawthorne Option, which travels along portions of Hawthorne Boulevard, as well as the Elevated/At-Grade Alignment, Trench Option, and project alternatives, including the 170th/182nd Grade-Separated Light Rail Transit Alternative (selected by the Metro Board as the LPA in May 2024 and referred to as the "Hybrid Alternative"). Potential noise impacts associated with Elevated/At-Grade Alignment and Options are evaluated in Section 3.6, Noise and Vibration, of the Draft EIR. Potential noise impacts associated with the LPA are evaluated in Chapter 4, Evaluation of Alternatives, of the Draft EIR, with additional clarifications provided in Section 4.20, Corrections and Additions, of the Final EIR. The Metro Board will consider the analyses and conclusions of the Draft EIR and Final EIR as part of its consideration of whether to certify the Final EIR and approve the project. Additionally, the recently completed Redondo Beach Transit Center is a bus transit center developed by the City of Redondo Beach; it is not a Metro project. However, the transit center project was funded, in part by local transit dollars from the Metro Call for Projects Funds, Measure R, and Measure M Local Return Transit Funds. See responses to Comments 10-1 and 10-2.

Submission 11 Margie Alexander

11-1 The potential for vibration impacts for the Elevated/At-Grade Alignment, the Trench Option, and the Hawthorne Option are addressed in Section 3.6, Noise and Vibration, of the Draft EIR. The potential for LPA impacts is addressed in Chapter 4, Evaluation of Alternatives, of the Draft EIR. See response to Comment 1970-17. The predicted vibration levels at Breakwater Village are shown in Figure 3.6-B13A of Appendix 3.6-C Vibration Detail Maps. Operational vibration annoyance impacts would be mitigated to less than significant with mitigation for all Metro ROW alignments and the Hawthorne Option.

Regarding construction vibration impacts, the Draft EIR identifies temporary vibration impacts that could occur from certain activities, including pile driving, heavy equipment operation, and other high-impact construction methods. To address these impacts, Mitigation Measures MM-VIB-1: Vibration Control Plan, MM-VIB-2: Construction Equipment Location, and MM-VIB-3: Pre- and Post-Construction surveys, would be required. With implementation of these mitigation measures, potential vibration-related structural damage impacts of the Trench Option, the Hawthorne Option, and the LPA would be reduced to less than significant with mitigation.

However, the vibration-related annoyance impacts associated with construction of each of those alignments would remain significant and unavoidable, even with mitigation. These annoyance impacts would be temporary and limited to periods when the most vibration-intensive equipment (e.g., pile drivers and vibratory compactors), is in use, which would typically be for a short duration near any given property.

In contrast to the Trench Option, the Hawthorne Option, and the LPA, construction of the Elevated/At-Grade Alignment would result in significant and unavoidable vibration impacts related to both structural damage and vibration annoyance, due to the need for pile driving to reconstruct the Grant Avenue freight bridge. Although the identified mitigation measures would reduce these impacts to the maximum extent feasible, they would not eliminate them.

See MR-4: Potential Negative Health Effects related to Noise, Vibration, and Air Quality.

11-2 Metro takes the safety and well-being of nearby communities, including senior residents at Breakwater Village, very seriously. Every aspect of the project has been and would continue to be designed to address potential risks and ensure that construction and operation are conducted safely. To clarify, the proposed light rail would be at-grade adjacent to Breakwater Village. There is no trench in this segment of the ROW for all alignments studied in the Draft EIR.

The presence of natural gas lines and petroleum pipelines, their potential impacts, and applicable regulatory requirements are addressed in Sections 3.9, Hazards and Hazardous Materials, and 3.11, Utilities and Service System, of the Draft EIR. Potential impacts of the LPA in this context are evaluated in Chapter 4, Evaluation of Alternatives, of the Draft EIR. In addition, Section 4.13 of Chapter 4, Corrections and Additions, of the Final EIR expands on the analysis in Section 3.9-4.2.1 of the Draft EIR by clarifying the protocols, construction techniques, regulations, and standards with which the project would comply. As detailed therein, the clarifications do not change the Draft EIR's conclusion that impacts related to oil and gas pipelines would be less than significant. See MR-7: Utility Relocation and Hazardous Materials Safety, MR-8: Light Rail and Freight Train Safety, and MR-13: Soil Stability and Sinkholes.

11-3 Metro has fully evaluated the project's environmental impacts and proposed stringent mitigation measures to reduce impacts to the maximum extent feasible. See MR-4: Potential Negative Health Effects Related to Noise, Vibration, and Air Quality and MR-10: Changes to Community Character.

Potential air quality impacts are addressed in Section 3.4, Air Quality, of the Draft EIR. Compliance with Project Features PF-AQ-1: Tier 4 Engine Standards and PF-AQ-2: Dust Control Best Practices would ensure that construction activities comply with South Coast Air Quality Management District and Metro standards controlling emissions and dust. Operationally, the light rail vehicles would be powered by electricity and would not produce localized emissions. Regional air quality would improve with implementation of the project due to a shift from passenger vehicles to light rail in the corridor. Regarding any dangers associated with moving utilities, see MR-7: Utility Relocation and Hazardous Materials Safety. Regarding property values, see MR-14: Property Values and Impacts to Businesses.

11-4 Metro is committed to integrating safety into all Metro rail operations. The project would comply with relevant safety standards, including the California Manual on Uniform Traffic Control Devices, the California Department of Transportation Highway Design Manual, the Americans with Disabilities Act, and Metro's Grade Crossing Safety Policy. The LPA would be fully grade-separated from all roadways, thereby avoiding potential conflicts with pedestrians or cyclists. See MR-8: Light Rail and Freight Train Safety and MR-9: Light Rail Security.

Submission 12 Janet Lindquist

12-1 The commenter's support for the Hawthorne Option is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives. Pedestrian safety is addressed in Section 3.1, Transportation, of the Draft EIR. Metro is committed to integrating safety into all Metro rail operations. The project would comply with relevant safety standards, including the California Manual on Uniform Traffic Control Devices, the California Department of Transportation Highway Design Manual, the Americans with Disabilities Act, and Metro's Grade Crossing Safety Policy. The Locally Preferred Alternative (LPA) would be fully grade-separated from all roadways, thereby avoiding potential conflicts with pedestrians or cyclists.

Submission 13 Tom Wooge

13-1 The commenter's support for the Hawthorne Option is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

13-2 The commenter's observation on the Metro Rail system and support for the Hawthorne Option is noted. All comments have been shared with the Metro Board for their consideration.

Submission 14 N/A

14-1 The commenter's support for the Trench Option is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 15 Steven Miyamoto

15-1 The commenter's support for the Hawthorne Option is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives and MR-15: Metro Ridership Forecasting Methodology. The LPA, Trench Option and Hawthorne Option would all grade separate light rail to avoid any conflicts with vehicles, pedestrians, and cyclists traveling on roadways.

Submission 16 Milan Matsumoto

16-1 The commenter's support for the Hawthorne Option, and secondary support for an elevated configuration along the Metro ROW is noted. All comments have been shared with the Metro Board for their consideration. The Elevated/At-Grade Alignment and LPA would both have an elevated segment in the north between the Redondo Beach (Marine) Station to south of 162nd Street, where it transitions down to travel at-grade. See MR-1: Selection of Alternatives.

Submission 17 Russell Czwleger

17-1 The commenter's support for the Hawthorne Option is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 18 Dina Gallo

18-1 The commenter's support for the project is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 19 David M

19-1 The commenter's support for the Right-of-Way Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 20 Grace Peng

20-1 Relative to the Trench Option, the LPA would reduce the area that would be trenched and address many of the construction-related concerns identified by the commenter. See MR-1: Selection of Alternatives and MR-3: Operational Noise Project Features and Mitigation Measures.

20-2 The presence of natural gas lines and petroleum pipelines, their potential impacts, and applicable regulatory requirements are addressed in Sections 3.9, Hazards and Hazardous Materials, and 3.11, Utilities and Service Systems, of the Draft EIR. Potential impacts of the LPA in this context are evaluated in Chapter 4, Evaluation of Alternatives, of the Draft EIR. In addition, Section 4.13, Corrections and Additions, of the Final EIR expands on the analysis in Section 3.9-4.2.1 of the Draft EIR by clarifying the protocols, construction techniques, regulations, and standards with which the project would comply. As detailed therein, these clarifications do not change the Draft EIR's conclusion that impacts related

to oil and gas pipelines would be less than significant. See MR-7: Utility Relocation and Hazardous Materials Safety for utility and pipeline relocation details in the Metro ROW. See MR-13: Soil Stability and Sinkholes for how construction and operation in the corridor would be handled in the context of soil conditions. See MR-3: Operational Noise Project Features and Mitigation Measures, regarding the installation of soundwalls and establishment of quiet zones.

20-3 The commenter's suggestions for ROW elevated/street-grade light rail are noted. All comments have been shared with the Metro Board for their consideration. Also, a High-Frequency Bus Alternative along parts of Hawthorne Boulevard is addressed in Chapter 4, Evaluation of Alternatives, of the Draft EIR.

20-4 The commenter's support for the High-Frequency Bus Alternative is noted. All comments have been shared with the Metro Board for their consideration. Street improvements on local city streets are generally not within the purview of Metro.

20-5 See response to Comment 20-4.

20-6 See response to Comment 20-1. Additionally, the project would be subject to Mitigation Measures MM-NOI-2: Soundwalls and MM-NOI-4: Quiet Zone Establishment for the Metro ROW Alignments. See MR-3: Operational Noise Project Features and Mitigation Measures for more information. Soundwalls are considered for all alignments studied (both along Metro ROW and Hawthorne Blvd).

Submission 21 can be found in Section 5.3 Responses to Public Agencies

Submission 22 can be found in Section 5.3 Responses to Public Agencies

Submission 23 Adriana Heidman

23-1 As discussed in Section 3.6, Noise and Vibration, and Chapter 4, Evaluation of Alternatives of the Draft EIR, the project includes Mitigation Measure MM-NOI-2: Soundwalls to reduce noise impacts to a less than significant level with mitigation. While soundproofing measures, such as retrofitting homes with noise insulation, have been used in some contexts, such as near airports, this approach is not considered feasible or appropriate for the following reasons

> Construction noise is temporary and mobile: Construction would occur in phases along the project alignment over a multi-year period, and no single home would experience intense noise for the full construction duration. Rather, heavy construction activity would be localized to a given block or segment for limited durations, with quieter finishing work occurring thereafter. Retrofitting homes for such temporary, localized impacts is not a proportionate or effective mitigation strategy.

> Retrofitting is not an effective approach for exterior noise: Construction noise is measured and assessed using exterior noise criteria, and the most effective mitigation is achieved by reducing noise at the source (e.g., through equipment selection, barriers, and site management). Soundproofing interior spaces, such as

replacing windows or adding wall insulation, does not address outdoor noise levels and may not be effective unless doors, ventilation, and other openings are also sealed.

- Interior ventilation could be impaired: For acoustic retrofitting to meaningfully reduce noise levels, windows would need to remain closed, which may conflict with ventilation and air quality needs protected under building codes and preferred by some residents. If windows remained open, the intended goal of reducing noise impacts to sensitive receptors would not be achieved as desired, reducing the effectiveness of mitigation measures.
- Retrofitting would require extensive coordination and participation: Implementing an acoustic retrofitting program would require sending formal offers to hundreds of property owners and tenants, negotiating liability and access terms, and coordinating multiple in-unit site visits for testing, construction, and post-construction verification. Many tenants would likely be unresponsive or unwilling to permit construction inside their homes, particularly given the disruptions and potential impacts to the buildings, such as interference with existing waterproofing.
- Retrofit measures are logistically and financially infeasible on a broad scale: Installing replacement windows or conducting individualized building modifications would require property-by-property assessments of building construction type, existing window conditions, occupancy status, and owner consent. To be effective, each unit would need to be analyzed based on building age, construction type, orientation, and existing conditions. It would also require coordination with contractors, temporary relocation in some cases, and follow-up inspections. These efforts would be highly disruptive to residents and disproportionately burdensome relative to the temporary nature of the impact. Further, given the scale, complexity, and potential for low participation, such a program would be unlikely to be completed within a reasonable timeframe.
- Retrofit measures may introduce secondary impacts: Construction work to install new windows or insulation, particularly if done on an expedited basis in an occupied home, can itself create disruptions, such as noise, dust, and temporary loss of access. These impacts could exceed or compound the temporary construction noise the retrofit is intended to mitigate.

For these reasons, retrofitting homes is not proposed as a feasible mitigation measure for construction noise impacts. Such a measure would be of uncertain effectiveness for the reasons described above and therefore would not constitute appropriate mitigation under CEQA. Metro could not force tenants and homeowners to participate in such a program, further limiting the measure's ability to meaningfully reduce the impact it is intended to address. Instead, the project would implement proactive measures that reduce noise at the source, are enforceable through the Noise Control Plan, and are applicable across the entire project corridor. See MR-3: Operational Noise Project Features and Mitigation Measures.

The 2023 Ridership Summary Report, published concurrently with the Draft EIR, shows that the project is expected to generate between 11,500 to 15,600 daily transit trips (boardings) daily. See MR-15: Metro Ridership Forecasting Methodology.

See MR-18: Homelessness.

Submission 24 Beryl Bryant

24-1 The commenter's opposition to the Metro ROW alignment and support for the Hawthorne Option are noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

24-2 Under CEQA, economic impacts such as changes in property values are not considered environmental impacts. The Draft EIR focuses on physical environmental impacts and measures to mitigate them, as required by CEQA. However, to address questions and concerns on property values, Metro has prepared more information. See MR-14: Property Values and Impacts to Businesses.

Submission 25 Duane Green

25-1 The commenter's support for the Hawthorne Option is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives and MR-10: Changes to Community Character.

Submission 26 Luis

26-1 The commenter's support of the Trench Option is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives. Potential effects to the transportation network are addressed in Section 3.1, Transportation, of the Draft EIR, and potential visual effects are addressed in Section 3.3, Aesthetics, of the Draft EIR. The potential for LPA impacts is addressed in Chapter 4, Evaluation of Alternatives, of the Draft EIR. It should be noted that in addition to the Trench Option, the LPA and Hawthorne Option would grade separate light rail to avoid conflicts with vehicles, pedestrians, and cyclists traveling along roadways.

Submission 27 Vincent Perez

27-1 The Hawthorne Option would locate the light rail transit tracks and station in an elevated guideway above the median of Hawthorne Boulevard. Pedestrian crossings would be maintained at existing intersections or would be added at new, signalized intersections.

Submission 28 Lena Pullen

28-1 See MR-9: Light Rail Security and MR-18: Homelessness.

28-2 As described in Chapter 2, Project Description, of the Draft EIR, the Elevated/At-Grade Alignment would have two at-grade light rail crossings at 170th and 182nd Streets, while the Trench Option would be fully grade-separated. With respect to noise, under Project Features PF-NV-2: Crossing Signal Bell Shrouds and PF-NV-3: Gate-Down-Bell-Stop Variance, Metro would shroud the crossing signal bells at 170th and 182nd Streets and apply for a gate-down-bell-stop variance to reduce the duration of bell ringing. See MR-3: Operational Noise Project Features and Mitigation Measures.

It should be noted that the LPA would significantly reduce noise impacts compared to the Elevated/At-Grade Alignment because it eliminates the at-grade light rail crossings at 170th and 182nd Streets by locating the light rail in short trenches. By grade separating the light rail from all roadways, the LPA removes the need for audible warning at light rail crossings, such as routine train horns and crossing bells. Regarding system operations, the anticipated hours of operation are 4:00 a.m. one day to 1:00 a.m. the following day. System headways would be reduced during early morning (4:00 a.m. to 6:00 a.m.) and late-night hours (7:00 p.m. to 1:00 a.m.) to approximately 15 minutes. Peak-hour system headways would be 5 minutes during peak travel hours. Weekend system headways would be reduced compared to weekdays due to reduced commuter demand. See MR-1: Selection of Alternatives and MR-12: Emergency Access.

28-3 The commenter's preference for the No Project Alternative is noted. All comments have been shared with the Metro Board for their consideration. Metro understands concerns regarding property values. However, under CEQA, economic impacts such as changes in property values are not considered environmental impacts. The Draft EIR focuses on physical environmental impacts and measures to mitigate them, as required by CEQA. However, to address questions and concerns on property values, Metro has prepared more information. See MR-14: Property Values and Impacts to Businesses.

Submission 29 Robert Sanchez

29-1 The commenter's support for the Hawthorne Option, Trench Option, and Metro ROW alignment, and the order of their preferences, is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

29-2 The commenter's support for the project is noted. All comments have been shared with the Metro Board for their consideration. See MR-3: Operational Noise Project Features and Mitigation Measures.

Submission 30 Tom Wooge

30-1 The analysis in Section 3.6, Noise and Vibration, of the Draft EIR, follows federal guidance, specifically the Federal Transit Administration Transit (FTA) Noise and Vibration Impact Assessment Manual (2018) to assess transit noise impacts. This same guidance was used to address potential impacts associated with the LPA. This methodology evaluates whether projected noise levels would exceed FTA's impact thresholds for sensitive receptors. The analysis ensures a consistent, objective approach to determine potential noise impacts and identify when mitigation measures are required. See MR-2: Operational Noise Analysis Methodology and Impact Thresholds.

30-2 The analysis in Section 3.6, Noise and Vibration, of the Draft EIR, evaluates the potential noise impacts of both the Metro ROW alignments and the Hawthorne Option within the context of both existing noise environments. This approach considers how project-related noise would interact with and contrast against existing background levels in residential and commercial areas, including background traffic noise on Hawthorne Boulevard. The noise analysis accounts for the location of noise-sensitive land uses along both Hawthorne Boulevard and the Metro ROW. This accounts for Hawthorne Boulevard having less

residential density than along the Metro ROW. The commenter does not cite – and Metro has not identified – any scientific or medical evidence demonstrating a causal relationship between the operation of light rail transit and the onset or exacerbation of ligyrophobia (the intense fear of loud noises). In the absence of any such evidence, any attempt to evaluate this alleged psychological impact would be speculative. Moreover, ligyrophobia is typically associated with sudden or unpredictable wounds like fireworks, balloons popping or alarms, whereas light rail systems are generally quieter and predictable compared to many other urban noise sources. See MR-4: Potential Negative Health Effects Related to Noise, Vibration, and Air Quality.

Regarding the existing noise environment along the Metro ROW, existing noise sources include freight operations and local vehicular traffic. The freight horn is an existing intense source of noise which produces noise levels up to 110 dBA (a-weighted decibel). The proposed mitigation measures in the Draft EIR would mitigate potential noise impacts along the Metro ROW. In addition, the project would enable the local jurisdictions along the Metro ROW to obtain a "quiet zone" designation, which would reduce existing freight noise overall along the corridor, by eliminating routine freight horn soundings, which as noted previously, produce noise levels of up to 110 dBA. See MR-3: Operational Noise Project Features and Mitigation Measures.

30-3 CEQA does not assess beneficial impacts but evaluates specific environmental impact thresholds, as described in Chapter 3, Affected Environment and Environmental Impact Analyses, of the Draft EIR. See MR-1: Selection of Alternatives.

30-4 The commenter's support for the Hawthorne Option is noted. All comments have been shared with the Metro Board for their consideration.

Submission 31 Tom Wooge

31-1 As described in Section 3.2, Land Use and Planning, of the Draft EIR in Section 3.2-4.2, the project would comply with all applicable regulations and local ordinances governing construction activities to the extent feasible. Table 3.2-5, starting on page 3.2-26 of the Draft EIR, provides a detailed analysis of the Elevated/At-Grade Alignment's consistency with applicable land use plans, policies, and regulations pertinent to the project. The discussions in Table 3.2-5 of the Draft EIR would apply similarly to the Trench Option and Hawthorne Option. The Draft EIR concludes that the Elevated/At-Grade Alignment and Options would result in a less than significant impact. This same analysis applies to the LPA, as discussed in Chapter 4, Evaluation of Alternatives, of the Draft EIR.

As discussed in Section 3.2-4.1 of the Draft EIR, the project would not physically divide a community because residents would still be able to cross the Metro ROW at all existing designated rail crossings—i.e., the crossings at Inglewood Avenue, Manhattan Beach Boulevard, 159th, 160th, 161st, 162nd, 170th, and 182nd Streets. Land uses would not be altered so as to isolate any one part of the community from the other. The alignments evaluated along the Metro ROW, including the LPA, would result in less than significant impacts related to physical division of communities. It should also be noted that the LPA would fully grade separate the light rail from all roadways.

31-2 The comment is noted for the record. All comments have been shared with the Metro Board for their consideration.

31-3 As discussed in Section 3.2, Land Use and Planning, of the Draft EIR, the project would replace or repair existing security fencing and add soundwalls in some locations, which would limit unauthorized access into the Metro ROW to ensure safety near operating rail. However, this does not constitute physical division of a community because residents would still be able to cross the Metro ROW at all existing designated crossings. See also response to Comment 31-1.

31-4 See response to Comments 31-1 and 31-3. As described in Section 3.2, Land Use and Planning, of the Draft EIR, the project would include safety barriers that would restrict the current level of unauthorized pedestrian access into the Metro ROW near active freight. Pedestrian access would still be available at the existing crossings, and the light rail would be grade-separated in all instances except in the Elevated/At-Grade Alignment crossing of 170th Street and 182nd Street, while freight crossings would be enhanced with safety improvements.

The commenter's support for the Hawthorne Option is noted. As a point of clarification, there are no pedestrian bridges planned along the Metro ROW as part of any alignment or design option. Similar to the Hawthorne Option, under the LPA and Trench Option the light rail would be fully grade-separated from all roadways. Pedestrians would cross streets at-grade and avoid any conflicts with light rail trains. See MR-1: Selection of Alternatives.

The following commenter made their comment in Spanish. Its response is given first in Spanish. An English translation follows.

Propuesta 32 Natalia Cliborn

32-1 Conforme a la Ley de Calidad Ambiental de California (CEQA), los impactos económicos tales como los cambios en los valores de las propiedades no se consideran impactos ambientales. El Borrador del Reporte de Impacto Ambiental se centra en los impactos ambientales físicos y las medidas para mitigarlos tal como lo requiere dicha ley. Para abordar cuestiones e inquietudes sobre el valor de las propiedades, Metro ha preparado más información. Consultar MR-14: "Valores de las propiedades e impactos a los comercios."

Submission 32 Natalia Cliborn

32-1 Under CEQA, economic impacts such as changes in property values are not considered environmental impacts. The Draft EIR focuses on physical environmental impacts and measures to mitigate them, as required by CEQA. To address questions and concerns on property values, Metro has prepared more information. See MR-14: Property Values and Impacts to Businesses.

Submission 33 Donna Perkins

33-1 The commenter's support for the Metro ROW alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

33-2 The commenter's opposition to the High-Frequency Bus Alternative as a substitution for rail service is noted. All comments have been shared with the Metro Board for their consideration.

Submission 34 Matthew Hinsley

34-1 See responses to Comments 34-2 and 34-3.

34-2 As explained on page 3.1-3 of the Draft EIR, traffic delay (often measured by level of service) is no longer permissible as a CEQA impact criterion and therefore this analysis and related topics are not addressed in the Draft EIR. See MR-11: Traffic Delay and Level-of-Service and the 2023 Transportation Detail Report, published concurrently with the Draft EIR, for a discussion of traffic conditions. Under the LPA, the light rail would be fully grade-separated from all roadways and would not increase vehicle delay compared to existing conditions.

34-3 Metro would implement mitigation measures directly under its control, including Mitigation Measures MM-NOI-2: Soundwalls and MM-NOI-3: Low Impact Frogs. Additionally, Metro would install quiet zone equipment as part of Project Feature PF-NV-1: Quiet Zone Equipment Installation, which would qualify the crossings for an Automatic Federal Railroad Administration (FRA) Approval for a quiet zone. However, under federal regulations, cities must submit the quiet zone application to FRA. The Draft EIR acknowledges that implementation of quiet zones ultimately requires action by local jurisdictions. To address this, Mitigation Measure MM-NOI-4: Quiet Zone Establishment commits Metro to working with the cities to support the FRA application. See MR-3: Operational Noise Project Features and Mitigation Measures.

The Draft EIR fully discloses noise impacts with and without the implementation of quiet zones in Appendix 3.6-B of the Draft EIR, in Table 15 (page 93) and Table 16 (page 101). This is further explained in pages 3.6-100 through 3.6-104 of the Draft EIR.

Submission 35 N/A

35-1 The commenter's support for the Metro ROW alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 36 Eric Homier

36-1 The commenter's support for the Hawthorne Option is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives. Metro is committed to integrating safety into all Metro rail operations. The project would comply with relevant safety standards, including the California Manual on Uniform Traffic

Control Devices, the California Department of Transportation Highway Design Manual, the Americans with Disabilities Act, and Metro's Grade Crossing Safety Policy. Under the LPA, the light rail would be fully grade-separated from all roadways, thereby avoiding potential conflicts with pedestrians or cyclists. See MR-8 Light Rail and Freight Train Safety and MR-9: Light Rail Security.

36-2 The project would provide an alternative mode to single-occupant vehicle travel throughout the region in an area currently unserved by the regional rail network. While a station is proposed near 182nd Street at the Redondo Beach Transit Center, this location would provide pedestrian access to nearby neighborhoods and businesses with the opportunity to arrive by local and regional buses as well. As described in Chapter 2, Project Description, of the Draft EIR, Metro would not create additional vehicle parking at the city's recently constructed Redondo Beach Transit Center.

Section 3.6, Noise and Vibration, and Chapter 4, Evaluation of Alternatives, of the Draft EIR, analyze impacts related to noise and vibration impacts. The LPA, Trench Option and Hawthorne Option, would have less than significant noise impacts with mitigation during operations.

The LPA, Hawthorne Option, and Trench Option would all be fully grade-separated from all roadways. The Hawthorne Option would involve modifications to Hawthorne Boulevard to accommodate the support columns for the elevated guideway. This includes reducing the number of northbound left-hand turn lanes at 177th Street from two to one. For additional information, see MR-11: Traffic Delay and Level-of-Service. As explained on page 3.1-3 of the Draft EIR, traffic delay (often measured by level of service) is no longer permissible as a CEQA impact criterion and therefore this analysis and related topics are not addressed in the Draft EIR. See MR-11: Traffic Delay and Level-of-Service and the 2023 Transportation Detail Report, published concurrently with the Draft EIR, for a discussion of traffic conditions.

Metro understands concerns regarding property values. However, under CEQA, economic impacts such as changes in property values are not considered environmental impacts. The Draft EIR focuses on physical environmental impacts and measures to mitigate them, as required by CEQA. To address questions and concerns on property values, Metro has prepared more information. See MR-14: Property Values and Impacts to Businesses and MR-10: Changes to Community Character.

Submission 37 Johnny Menhennet

37-1 Submission 2 includes the same comment from the same commenter. See response to Comment 2-1.

Submission 38 Marvin E. Badawi

38-1 The commenter's preference for the Hawthorne Option is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Metro understands concerns regarding property values. However, under CEQA, economic impacts such as changes in property values are not considered environmental impacts. The Draft EIR focuses on physical environmental impacts and measures to mitigate them, as required by CEQA. To address questions and concerns on property values, Metro has prepared more information. See MR-14: Property Values and Impacts to Businesses.

Submission 39 Matt and Lori Smalling

39-1 The commenter's support for the Hawthorne Option is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

39-2 Metro is committed to integrating safety into all Metro rail operations. The project would comply with relevant safety standards, including the California Manual on Uniform Traffic Control Devices, the California Department of Transportation Highway Design Manual, the Americans with Disabilities Act, and Metro's Grade Crossing Safety Policy. The LPA, Trench Option and Hawthorne Option, would be fully grade-separated from all roadways, thereby avoiding potential conflicts with pedestrians or cyclists. See MR-8: Light Rail and Freight Train Safety and MR-9: Light Rail Security, MR-10: Changes to Community Character.

The project would add Metro light rail vehicles to the Metro ROW, not high-speed trains. High speed rail passenger trains operate at speeds over 125 miles per hour with potential to carry hundreds of passengers, while the Metro light rail vehicles would operate at speeds up to 45 miles per hour throughout the residential areas.

39-3 The width of the Metro ROW varies throughout the corridor and thus the distance between rail tracks and property lines varies along the corridor. All light rail and freight tracks are designed according to Metro's design criteria with appropriate clearances, which include space for maintenance. See Appendix 2-A, Select Advanced Conceptual Engineering Drawings, of the Draft EIR and Final EIR Appendix B, Select Advanced Conceptual Engineering Drawings - Locally Preferred Alternative, for more details on the placement of relocated freight and light rail tracks, including specific design clearances.

39-4 Metro takes the safety and well-being of nearby communities very seriously. Every aspect of the project has been and would continue to be designed to address potential risks and ensure that construction and operation are conducted safely. To clarify, the proposed light rail would be at-grade adjacent to Ruxton Ridge. There is no trench in this area for all alignments studied.

The presence of natural gas lines and petroleum pipelines, their potential impacts, and applicable regulatory requirements are addressed in Sections 3.9, Hazards and Hazardous Materials, and 3.11 Utilities and Service System, of the Draft EIR. Potential impacts of the LPA in this context are evaluated in Chapter 4, Evaluation of Alternatives, of the Draft EIR. In addition, Section 4.13, Corrections and Additions, of the Final EIR expands on the analysis in Section 3.9-4.2.1 of the Draft EIR by clarifying the protocols, construction techniques, regulations, and standards with which the project would comply. As detailed therein, these clarifications do not change the Draft EIR's conclusion that impacts related to oil and gas pipelines would be less than significant. See MR-7: Utility Relocation and Hazardous Materials Safety and MR-13: Soil Stability and Sinkholes.

39-5 Impacts associated with soil stability are addressed in Section 3.8, Geology and Soils, of the Draft EIR. The potential for LPA impacts is addressed in Chapter 4, Evaluation of Alternatives, of the Draft EIR. See MR-13: Soil Stability and Sinkholes for additional information. The project would incorporate Project Feature PF-GEO-1: Metro Geotechnical Design Standards, which ensures that the project complies with Metro's Geotechnical Design Standards as outlined in the Metro Rail Design Criteria. These standards require thorough geotechnical investigations to assess and address risks such as settlement, slope, instability, and lateral deformations, as well as detailed stability analyses of retaining walls and embankments and incorporation of reinforce or other design features as necessary to ensure long-term stability and safety. Retaining walls would be designed with drainage features to manage groundwater and prevent water accumulation behind the walls, thereby maintaining stability during various weather events, including heavy rains.

The Draft EIR includes a detailed evaluation of potential visual changes. While it does not specially isolate retaining walls as a visual element, the analysis applies the Federal Highway Administration's methodology for evaluating visual quality, based on three criteria: vividness (the memorability of the landscape), intactness (the extent to which the landscape is free from visual intrusions), and unity (the coherence and harmony of the landscape). As described in Section 3.3, Aesthetics, of the Draft EIR, the project area is already highly urbanized, with a mix of residential, industrial, and commercial land uses, as well as existing freight rail infrastructure. There are no designated scenic vistas or notable natural landscapes within the project's vicinity. Because the existing visual quality is already rated low under all three criteria, permanent visual changes introduced by the project, including structural elements such as retaining walls, not degrade the visual environment and are considered neutral in effect. With respect to potential for new shading, the creation of shade on a private property, such as reduced sunlight in a private yard, is generally not considered a significant environment unless it affects public spaces or public resources such as parks, open space, or solar access. In addition, because the position of the sun changes throughout the day and year, any shading from project features would be temporary and vary in duration, rather than causing continuous loss of light. In some cases, shade may even be beneficial, particularly during hot weather. For these reasons, shading of individual properties is not considered a significant impact.

Impacts related to alterations of drainage patterns are addressed in Section 3.10, Hydrology and Water Quality, of the Draft EIR. Each alignment option would increase impervious surfaces but would include a low-impact development (LID) drainage system designed to retain most stormwater runoff within the project footprint. This system would meet the stormwater quality design volume requirements under the MS4 Permit established by the Los Angeles Regional Water Quality Control Board (LARWQCB), minimizing flooding on-site and off-site, including in sumps, per Project Feature PF-HWQ-6: Low Impact Development (LID) BMPs per Regional Requirements. Additional runoff from the project would continue to be collected by storm drain facilities. Elevated portions of the alignment would include down drains. Discharge locations of underdrains installed along the alignment would be the same as existing discharge locations. The retainment of the majority of stormwater runoff within the project footprint and preservation of existing discharge locations reduces the potential for erosion and sedimentation to occur on or off site. Thus, the impact of the addition of impervious

surfaces in a manner which would result in substantial erosion or siltation would be less than significant. Regarding stormwater management for the Trench Option, Project Feature PF-HWQ-7: Trench Operation Runoff Collection and Treatment would ensure proper collection, treatment, and rerouting of excess runoff, which would prevent flooding, reduce strain on sump pumps and help maintain natural water absorption.

As detailed in Chapter 4, Evaluation of Alternatives, of the Draft EIR, the LPA would have similar hydrology impacts to the Trench Option, with less than significant effects due to compliance with regional LID standards. For more information on LARWQCB requirements, see Section 3.10-1.2 of the Draft EIR.

39-6 Residences located along Ruxton Lane to the west of the Metro ROW are represented by Clusters E2 and E3 in Section 3.6, Noise and Vibration, Chapter 4, Evaluation of Alternatives of the Draft EIR. The multi-story building height was accounted for in the analysis and noise levels were predicted based on the third story of the building. The proposed source height (light rail tracks), receiver height (residences), and soundwall height and locations were all accounted for in the soundwall noise attenuation prediction per the Federal Transit Administration Noise and Vibration Impact Assessment Manual (2018). As shown on Page 3.6-52 of the Draft EIR, soundwalls are proposed along both the west and east side of the Metro ROW to mitigate light rail noise. As shown in Appendix 3.6-B of the Draft EIR, Table 4, pages 27-28, operational noise impacts to the residential buildings cited by the commenter would be less than significant with mitigation. Therefore, further mitigation is not necessary. For the Metro ROW alignments, the project would enable local cities to establish Quiet Zones with FRA, as part of Project Feature PF-NV-1: Quiet Zone Equipment Installation and Mitigation Measure MM-NOI-4: Quiet Zone Establishment. See MR-3: Operational Noise Project Features and Mitigation Measures.

39-7 The project would provide an alternate mode to single-occupant vehicle travel throughout the region in an area currently unserved by the regional rail network. While a station is proposed near 182nd Street at the Redondo Beach Transit Center, this location would provide pedestrian access to nearby neighborhoods and businesses with the opportunity to arrive by local and regional buses as well. As described in Chapter 2, Project Description, of the Draft EIR, Metro would not create additional vehicle parking at the Redondo Beach Transit Center.

Metro understands concerns regarding property values. However, under CEQA, economic impacts such as changes in property values are not considered environmental impacts. The Draft EIR focuses on physical environmental impacts and measures to mitigate them, as required by CEQA. To address questions and concerns on property values, Metro has prepared more information. See MR-14: Property Values and Impacts to Businesses.

The LPA would fully grade separate light rail from all roadways, and would not increase traffic congestion nor affect emergency access. See MR-12: Emergency Access. In addition, as explained on page 3.1-3 of the Draft EIR, traffic delay (often measured by level of service) is no longer permissible as a CEQA impact criterion and therefore this analysis and related topics are not addressed in the Draft EIR. See MR-11: Traffic Delay and Level-of-Service and the 2023 Transportation Detail Report, published concurrently with the Draft EIR, for a discussion of traffic conditions.

39-8 See MR-10: Changes to Community Character.

Submission 40 Donald Szerlip

40-1 As explained on page 3.1-3 of the Draft EIR, traffic delay (often measured by level of service) is no longer permissible as a CEQA impact criterion and therefore this analysis and related topics are not addressed in the Draft EIR. See MR-11: Traffic Delay and Level-of-Service and the 2023 Transportation Detail Report, published concurrently with the Draft EIR, for a discussion of traffic conditions. The LPA would fully grade separate light rail from all roadways, and would not increase vehicle delay compared to existing conditions.

Hawthorne Boulevard is a typical transportation corridor within the region with four or more traffic signals within short distances. The impacts assessments in the Draft EIR associated with the Hawthorne Option accounted for the proposed redevelopment project at the South Bay Galleria site. Metro would continue to coordinate with the South Bay Galleria as applicable in future phases of design.

Submission 41 John Schreiber

41-1 Although some residents use the Metro ROW for recreational activities, this use is not authorized or compliant with freight safety standards. Pedestrian safety is addressed in Section 3.1, Transportation, and Chapter 4, Evaluation of Alternatives, of the Draft EIR. Metro is committed to integrating safety into all Metro rail operations. The project would comply with relevant safety standards, including the California Manual on Uniform Traffic Control Devices, the California Department of Transportation Highway Design Manual, the Americans with Disabilities Act, and Metro's Grade Crossing Safety Policy. The LPA, Trench Options, and Hawthorne Option light rail guideways would be fully grade-separated from all roadways, thereby avoiding potential conflicts with pedestrians or cyclists.

As discussed in Section 3.2, Land Use and Planning, of the Draft EIR, the project would replace or repair existing security fencing and add soundwalls in some locations, which would limit unauthorized access into the Metro ROW to ensure safety near operating rail. This does not constitute physically dividing a community because residents would still be able to cross the Metro ROW at all existing designated rail crossings located at Inglewood Avenue, Manhattan Beach Boulevard, 159th, 160th, 161st, 162nd, 170th, and 182nd Streets. Land uses would not be altered so as to isolate any one part of the community from the other. The alignments evaluated along the Metro ROW alignments would result in less than significant impacts related to physical division of communities.

41-2 Under CEQA, the analysis of aesthetic impacts focuses on changes to views from publicly accessible locations. As the project is located in an urbanized area, the analysis in Section 3.3, Aesthetics, of the Draft EIR, evaluates whether the project would conflict with applicable zoning or other regulations governing scenic quality. This analysis considers visual character and scenic quality impacts from public vantage points but does not extend to private views or views from within residences. The detailed analysis, set forth on pages 3.3-55 through 3.3-114 of the Draft EIR, including visual simulations, concludes that none of the alignment options would conflict with applicable policies or regulations governing scenic quality. Therefore, this impact was determined to be less than

significant. As also described in the Draft EIR, there are no protected views within the resource study area. See MR-10: Changes to Community Character.

Submission 42 John Schreiber

42-1 See MR-8: Light Rail and Freight Train Safety. The project does not involve an increase in freight train traffic, nor does it alter existing freight operations, speeds, or loading patterns. Freight trains would continue to operate under existing regulatory safety requirements, including those imposed by the Federal Railroad Administration (FRA). In addition, the design of the light rail alignment would meet applicable standards for track separation and safety barriers, and the project would be coordinated with BNSF to ensure continued safe operations. Any design variances would be made in consultation with BNSF, CPUC, and other third parties such as utility owners, as applicable, with safety as the key priority.

42-2 The presence of natural gas lines and petroleum pipelines, their potential impacts, and applicable regulatory requirements are addressed in Sections 3.9, Hazards and Hazardous Materials, and 3.11 Utilities and Service System, of the Draft EIR. Potential impacts of the LPA in this context are evaluated in Chapter 4, Evaluation of Alternatives, of the Draft EIR. In addition, Section 4.13, Corrections and Additions, of the Final EIR expands on the analysis in Section 3.9-4.2.1 of the Draft EIR by clarifying the protocols, construction techniques, regulations, and standards with which the project would comply. As detailed therein, these clarifications do not change the Draft EIR's conclusion that impacts related to oil and gas pipelines would be less than significant. See MR-7: Utility Relocation and Hazardous Materials Safety and MR-13: Soil Stability and Sinkholes.

Submission 43 Kevin Mitchell

43-1 Metro understands concerns regarding property values. However, under CEQA, economic impacts such as changes in property values are not considered environmental impacts. The Draft EIR focuses on physical environmental impacts and measures to mitigate them, as required by CEQA. To address questions and concerns on property values, Metro has prepared more information. See MR-14: Property Values and Impacts to Businesses.

While change in community character does not constitute a significant impact under CEQA, Section 3.2, Land Use, and Section 3.3, Aesthetics, of the Draft EIR, analyzes the project's potential to physically divide communities and to affect visual quality and character. As discussed in these sections of the Draft EIR, the project would result in less than significant impacts. The potential for LPA impacts is addressed in Chapter 4, Evaluation of Alternatives, of the Draft EIR. See MR-8: Light Rail and Freight Train Safety and MR-10: Changes to Community Character.

43-2 As discussed on pages 2-12 and 2-26 of the Draft EIR, freight track modifications would be necessary to implement the Metro ROW alignments. Existing freight tracks would be shifted within the Metro ROW to accommodate the light rail tracks; the distances vary depending on the location. However, the freight track modifications would not encroach into residential properties, and the project is designed to avoid displacement of residents. Additionally, the proposed freight track modifications would be completed in accordance

with applicable Federal Rail Administration regulations and Metro's stringent design criteria, ensuring the new design meets safety requirements for both freight and light rail operations. See MR-8: Light Rail and Freight Train Safety and MR-20: Proximity Impacts of Relocated Freight Tracks. Any design variances would be made in consultation with BNSF, CPUC, and other third parties such as utility owners, as applicable, with safety as the key priority. In Spring 2025, Metro conducted a survey of property boundaries. That information is reflected in the Final EIR Appendix B, Select Advanced Conceptual Engineering Drawings - Locally Preferred Alternative. Metro would continue with property owners as design progresses.

43-3 The potential for noise impacts for the Elevated/At-Grade Alignment, the Trench Option, and the Hawthorne Option are addressed in Section 3.6, Noise and Vibration, of the Draft EIR. The potential for LPA impacts is addressed in Chapter 4, Evaluation of Alternatives, of the Draft EIR. As described in those sections, construction of each alignment option, including the LPA, would result in temporary noise levels that may exceed the Federal Transit Administration (FTA) construction impact criteria at some locations, despite the implementation of Mitigation Measure MM-NOI-1: Noise Control Plan. The EIR concludes that this impact would be significant and unavoidable, consistent with CEQA's requirement to disclose residential impacts that cannot be fully mitigated. Regarding operational noise impacts, the Draft EIR identifies that the combined noise from freight and light rail operations under the Elevated/At-Grade Alignment would result in significant and unavoidable impacts at 170th Street due to the need for audible warning devices and the gap in the soundwall necessary to maintain vehicle access. In contrast, during operation the Trench Option, Hawthorne Option, and LPA would have less than significant noise impacts after mitigation. The LPA, Trench Option, and Hawthorne Option would grade separate the light rail from all roadways, eliminating the need for light rail crossing bells and gates. As described in Chapter 4, Evaluation of Alternatives, of the Draft EIR and Section 4.21, Corrections and Additions, of the Final EIR, the operational noise impacts of the LPA would be comparable to those of the Trench Option and would be less than significant with mitigation. See MR-1: Selection of Alternatives for additional information regarding the identification of the LPA, and MR-3: Operational Noise Project Features and Mitigation Measures for more information.

43-4 As described in Section 3.6, Noise and Vibration, of the Draft EIR, the only location where the Elevated/At-Grade Alignment would result in significant and unavoidable vibration impacts related to structural damage would occur at Grant Avenue, where pile driving would be required to construct a new freight bridge under that alignment. Mitigation Measure MM-VIB-3: Pre- and Post-Construction Surveys would require contractors to document any damage resulting from construction vibration and repair it. The LPA, Trench Option, and Hawthorne Option would avoid this significant and unavoidable impact, as they do not require relocation of the Grant Avenue bridge. During operations, the relocated freight track would not result in vibration levels that could cause structural damage. See MR-5: Vibration Impact Types and Impact Thresholds and MR-20: Proximity Impacts of Relocated Freight Tracks.

43-5 The commenter's opposition to Metro ROW alignment is noted. All comments have been shared with the Metro Board for their consideration.

Submission 44 Janice Tanabe

44-1 The proposed light rail bridge would be built within Metro ROW, where there is sufficient space, and the existing freight bridge would remain unchanged. See Appendix 2-A, Select Advanced Conceptual Engineering Drawings, of the Draft EIR for more details on the proposed light rail bridge and existing freight bridge located at Artesia Boulevard.

Submission 45 can be found in Section 5.4 Responses to Groups and Organizations

Submission 46 Yumiko Omatsu

46-1 The commenter's photos show the Metro ROW in Redondo Beach and adjacent areas. The comment is noted for the record. All comments have been shared with the Metro Board for their consideration.

Submission 47 Yumiko Omatsu

47-1 The commenter's photos show the Metro ROW in Redondo Beach and adjacent areas. The comment is noted for the record. All comments have been shared with the Metro Board for their consideration.

Submission 48 Yumiko Omatsu

48-1 While privacy is not considered an environmental impact under CEQA, Metro understands that this may be a concern for residents and is committed to minimizing potential intrusions where feasible. During construction, activities near residential properties, including work on the berm, would be temporary and limited to specific phases of construction. Construction contractors would adhere to standard codes of conduct to ensure professional behavior on construction sites. During operation, privacy impacts from the light rail vehicles themselves are expected to be minimal. Trains would be in motion and would not stop or slow near residential properties, greatly limiting opportunities for riders or operators to observe private activities. In addition, light rail vehicles are generally enclosed and would be elevated or grade-separated, further reducing the potential for visual intrusion. The presence of natural gas lines and petroleum pipelines, their potential impacts, and applicable regulatory requirements are addressed in Sections 3.9, Hazards and Hazardous Materials, and 3.11 Utilities and Service System, of the Draft EIR. Potential impacts of the LPA in this context are evaluated in Chapter 4, Evaluation of Alternatives, of the Draft EIR. In addition, Section 4.13, Corrections and Additions, of the Final EIR expands on the analysis in Section 3.9-4.2.1 of the Draft EIR by clarifying the protocols, construction techniques, regulations, and standards with which the project would comply. As detailed therein, these clarifications do not change the Draft EIR's conclusion that impacts related to oil and gas pipelines would be less than significant. See MR-7: Utility Relocation and Hazardous Materials Safety, MR-13: Soil Stability and Sinkholes, and MR-20: Proximity Impacts of Relocated Freight Tracks.

48-2 The LPA avoids shifting the freight tracks closer to Breakwater Village, which is one reason staff recommended the Hybrid Alternative as the LPA. Potential air quality impacts,

including dust and exhaust emissions, are addressed in Section 3.4, Air Quality, of the Draft EIR, and Chapter 4, Evaluation of Alternatives, of the Draft EIR. Potential noise and vibration impacts are addressed in Section 3.6, Noise and Vibration, of the Draft EIR. As required by CEQA Guidelines, the Draft EIR fully analyzes potential impacts related to noise, vibration, air quality (including dust emissions), greenhouse gas (GHG) emissions, and geological conditions, and where significant impacts are identified, the Draft EIR proposes mitigation measures to reduce the potential impact to the extent feasible. For example, potential noise and vibration impacts have been addressed with mitigation measures such as soundwalls, quiet zones, resilient fasteners, and ballast mats to minimize noise and vibration impacts. Potential construction air quality impacts, including dust during construction, would be controlled through best available control measures, in accordance with Metro's Green Construction Policy and South Coast Air Quality Management District Rule 403, which would substantially reduce emissions and fugitive dust. With implementation of the mitigation measures established by the Draft EIR, construction air quality impacts of the ROW alignments and the LPA would be less than significant. Potential operational noise impacts of the LPA would also be less than significant with mitigation. See MR-4: Potential Negative Health Effects Related to Noise, Vibration, and Air Quality and MR-6: Vibration Analysis During Final Design. Potential soil stability impacts are addressed in Section 3.8, Geology and Soils, of the Draft EIR. See MR-13: Soil Stability and Sinkholes for additional information.

Submission 49 James Divine

49-1 The width of the Metro ROW varies throughout the corridor and thus the distances between rail tracks and property lines varies along the corridor. Light rail and freight tracks are designed according to Metro's design criteria with appropriate clearances, which includes space for maintenance. Any design variances would be made in consultation with BNSF, CPUC, and other third parties such as utility owners, as applicable, with safety as the key priority. See Appendix 2-A, Select Advanced Conceptual Engineering Drawings, of the Draft EIR and Final EIR Appendix B, Select Advanced Conceptual Engineering Drawings - Locally Preferred Alternative, for more details on the placement of relocated freight and light rail tracks, including specific design clearances.

The presence of natural gas lines and petroleum pipelines, their potential impacts, and applicable regulatory requirements are addressed in Sections 3.9, Hazards and Hazardous Materials, and 3.11 Utilities and Service System, of the Draft EIR. Potential impacts of the LPA in this context are evaluated in Chapter 4, Evaluation of Alternatives, of the Draft EIR. In addition, Section 4.13, Corrections and Additions, of the Final EIR expands on the analysis in Section 3.9-4.2.1 of the Draft EIR by clarifying the protocols, construction techniques, regulations, and standards with which the project would comply. As detailed therein, these clarifications do not change the Draft EIR's conclusion that impacts related to oil and gas pipelines would be less than significant. See MR-7: Utility Relocation and Hazardous Materials Safety and MR-13: Soil Stability and Sinkholes.

49-2 See response to Comment 49-1.

Submission 50 can be found in Section 5.4 Responses to Groups and Organizations

Submission 51 Janice Tanabe

51-1 Pacific Crest Cemetery is included as Cluster F1 in Section 3.6, Noise and Vibration, of the Draft EIR. As shown on page 3.6-60 of the Draft EIR, noise impacts at this sensitive land use would be less than significant with mitigation. The mitigated hourly noise level would be approximately 55.0 dBA, L_{eq}, which is comparable to normal speech at a distance of 3 feet, as shown in Figure 3.6-1. Additionally, noise levels at Pacific Crest Cemetery would be similar to those currently generated by existing local roadways bordering the cemetery, such as Inglewood Avenue, 182nd Street, and Grant Avenue. Metro has incorporated Mitigation Measures MM-NOI-2: Soundwalls and MM-NOI-3: Low Impact Frogs to reduce noise impacts to less than significant with mitigation, allowing for a respectful atmosphere for mourners and cemetery activities.

According to FTA Guidance, ground-borne vibration is primarily a concern within buildings, where structural elements can amplify perceptual motion. Train-generated vibration may occasionally be perceptible outdoors, but it is very rare for it to cause annoyance complaints in outdoor areas. For this reason, vibration annoyance impacts are typically not assessed for outdoor areas such as cemeteries and parks. In this case, Pacific Crest Cemetery does not include occupied structures where vibration levels would be evaluated under FTA threshold. Potential noise impacts to the cemetery and associated mitigation measures are addressed in Section 3.6-4.1.2 of the Draft EIR.

Submission 52 Eddie Jira

52-1 The commenter's support for the Hawthorne Option is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives and MR-10: Changes to Community Character.

Submission 53 Martha Edmundson

53-1 See MR-8: Light Rail and Freight Train Safety and MR-9: Light Rail Security. As described in Chapter 2, Project Description, of the Draft EIR, the entire light rail guideway would be enclosed by physical barriers, such as fencing, soundwalls, or a combination of both, to prevent unauthorized access. In addition, CEQA does not require an analysis of safety in terms of crime, as it is not an environmental issue, and therefore the Draft EIR does not make any conclusions regarding this topic.

Submission 54 Molly Jameson

54-1 The commenter's support for the project and the Trench Option specifically is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives. Traffic safety is assessed in Section 3.1, Transportation, of the Draft EIR. The potential for LPA impacts is addressed in Chapter 4, Evaluation of Alternatives, of the Draft EIR.

Submission 55 Paige Kaluderovic

55-1 The commenter's support for the Hawthorne Option is noted. All comments have been shared with the Metro Board for their consideration. Metro has worked diligently to develop feasible and effective mitigation measures to address the potentially significant impacts of the project, including construction activities. See MR-1: Selection of Alternatives and MR-10: Changes to Community Character.

55-2 Metro is committed to integrating safety into all Metro rail operations. See MR-8: Light Rail and Freight Train Safety and MR-9: Light Rail Security.

Submission 56 Valerie Lee

56-1 The commenter's support for the Hawthorne Option is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives. Metro has worked diligently to develop feasible and effective mitigation measures to address the potentially significant impacts of the project. While change in community character does not constitute a significant impact under CEQA, Section 3.2, Land Use, and Section 3.3, Aesthetics, of the Draft EIR, assess the project's potential to physically divide communities and to affect visual quality and character. As discussed in these sections of the Draft EIR, the project would result in less than significant impacts. The potential for LPA impacts is addressed in Chapter 4, Evaluation of Alternatives, of the Draft EIR. See MR-10: Changes to Community Character and MR-11: Traffic Delay and Level-of-Service.

Submission 57 Bob Wolfe

57-1 The commenter's opposition to the Hawthorne Option is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

57-2 See response to Comment 57-1 regarding selection of the LPA. The LPA would include a light rail station at the Redondo Beach Transit Center to allow for convenient bus/rail connections. As described in Section 2.3-1.1 of the Draft EIR, the project would include a multi-use recreational path that would provide direct access to the light rail station via Grant Avenue and 182nd Street. Bicycle parking would be provided at all stations. If the Hawthorne Option is selected for implementation, Metro would continue to coordinate with the South Bay Galleria on station access in future phases of design. The potential for LPA impacts is addressed in Chapter 4, Evaluation of Alternatives, of the Draft EIR.

57-3 See response to Comment 57-1. The LPA would include a light rail station at the Redondo Beach Transit Center.

57-4 The project would provide direct connection to the LAX Automated People Mover via the K Line.

57-5 See response to Comment 57-2.

57-6 Providing a signalized crossing reduces the walking distance for the many travelers who would be traveling to and from the south of the station. This is also supported by the analysis of vehicle-pedestrian collisions along the corridor, as shown in detailed Figure 3.1-

14 in the Draft EIR. Without a signalized crossing at the south end of the station, transit passengers approaching the station from the south (from around 177th Street) would be more likely to attempt to unsafely cross Hawthorne Boulevard because of the long distance to signalized crossings at Artesia Boulevard.

In the segment of Hawthorne between approximately 162nd Street and Redondo Artesia Boulevard (which has more crossings), there were far fewer collisions total than in a comparable distance from Artesia Boulevard south to 182nd Street (which has fewer crossings). The project seeks to reduce the risk of unsafe crossing behavior by providing safe crossing locations as close to the station as possible.

57-7 Section 3.1, Transportation, of the Draft EIR, describes that transit bus routes would likely continue to provide a direct connection between the proposed station and the Redondo Beach Transit Center; a transit passenger would not need to transfer through the Galleria between the two stops. During future design phases, further coordination with the South Bay Galleria would occur.

Submission 58 Lori Zaremski

58-1 The commenter's support for the Hawthorne Option is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 59 Fred Montalto

59-1 The commenter's support for the project is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 60 can be found in Section 5.3 Responses to Public Agencies

Submission 61 Janice Tanabe

61-1 See response to Comment 45-3.

Submission 62 William and Mary Hall

62-1 The width of the Metro ROW varies throughout the corridor and thus the distances between rail tracks and property lines varies along the corridor. All light rail and freight tracks are designed according to Metro's design criteria with appropriate clearances, which includes space for maintenance. See MR-8: Light Rail and Freight Train Safety and Appendix 2-A, Select Advanced Conceptual Engineering Drawings, of the Draft EIR and Final EIR Appendix B, Select Advanced Conceptual Engineering Drawings - Locally Preferred Alternative, for more details on the placement of relocated freight and light rail tracks, including specific design clearances.

62-2 See response to Comment 62-1. Metro's design standards account for any maintenance needed.

62-3 Refer to response to Comment 62-1.

Submission 63 Bob Cutler

63-1 Metro has received and reviewed the article accompanying this submission. The commenter's opposition to the ROW alignments is noted for the record. All comments have been shared with the Metro Board.

The concerns expressed regarding Breakwater Village, referenced in the article, are addressed in the Draft EIR. The Breakwater Village Apartments are represented as Clusters E2 and E3 in the noise analysis set forth in Section 3.6, Noise and Vibration, of the Draft EIR. As shown in Figure 3.6-22 (Elevated/At-Grade Alignment) and Figure 3.6-26 (Trench Option), operational noise impacts at Breakwater Village would be mitigated to less than significant with mitigation. Mitigation Measures MM-NOI-2: Soundwalls and MM-NOI-3: Low Impact Frogs would reduce operational noise at light rail crossovers. Predicted noise levels for the Elevated/At-Grade Alignment and Trench Option are provided on pages 3.6-60 and 3.6-73 of the Draft EIR for Clusters E2 and E3).

Construction noise contours for Breakwater Village are shown on page 3.6-37 of the Draft EIR. Metro would implement Mitigation Measure MM-NOI-1: Noise Control Plan to reduce construction noise and limit disturbance of sensitive receptors. See MR-3: Operational Noise Project Features and Mitigation Measures. The potential for LPA impacts is addressed in Chapter 4, Evaluation of Alternatives, of the Draft EIR. The LPA, Trench Option, and Hawthorne Option would not require the reconstruction of the Grant Avenue freight bridge, a major source of construction vibration.

Potential vibration impacts from operation analyzed in the Draft EIR. For the Elevated/At-Grade Alignment, vibration impacts are discussed on page 3.6-24. For the Trench Option, vibration impacts are discussed on pages 3.6-95 and 3.6-96 of the Draft EIR. The vibration impacts of the LPA are discussed on pages 4-43 to 4-44 of the Draft EIR and pages 4-88 through 4-118 of the Final EIR. Operational vibration impacts of each alignment option, including the LPA, would be reduced to less than significant with mitigation.

With respect to air quality and dust, Project Features PF-AQ-1: Use of Tier 4 Engines and PF-AQ-2: Best Practices for Dust Control would minimize the potential for significant construction air quality impacts. As detailed in Section 3.4 of the Draft EIR, the Elevated/At-Grade Alignment and Trench Option would have less than significant air quality impacts related to localized dust emissions during construction (although the Trench Option would have a significant and unavoidable construction air quality impact with respect to NOx). Construction of the LPA would result in less than significant air quality impacts, including impacts related to localized dust emissions.

The LPA avoids the need to relocate the existing freight tracks closer to Breakwater Village. This benefit is one of the reasons staff recommended the Hybrid Alternative as the LPA.

Submission 64 Mindy Fang

64-1 The commenter's opposition to the Hawthorne Option is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 65 Ray Hollar

65-1 The alignment transitions from an elevated guideway at the Redondo Beach (Marine) Station to an at-grade configuration to provide sufficient clearance from existing overhead high voltage transmission lines located south of the station. The change in elevation follows Metro design standards, which account for passenger comfort.

Submission 66 Jan, Thomas and Amanda Kurth

66-1 The width of the Metro ROW varies throughout the corridor and thus the distances between rail tracks and property lines varies along the corridor. Light rail and freight tracks are designed according to Metro's design criteria with appropriate clearances, which includes space for maintenance. Any design variances would be made in consultation with BNSF, CPUC, and other third parties such as utility owners, as applicable, with safety as the key priority. See MR-8: Light Rail and Freight Train Safety and Appendix 2-A, Select Advanced Conceptual Engineering Drawings, of the Draft EIR and Appendix B, Select Advanced Conceptual Engineering Drawings - Locally Preferred Alternative of the Final EIR, for more details on the placement of relocated freight and light rail tracks, including specific design clearances.

66-2 See response to Comment 66-1. Metro's design standards account for any maintenance needed.

66-3 See response to Comment 66-1.

Submission 67 Jose Dennis Alabaso

67-1 The comment does not pertain to the Draft EIR or the potential environmental impacts of the project. All comments have been shared with the Metro Board for their consideration. Chapter 2, Description of the Locally Preferred Alternative, of the Final EIR includes construction duration information for the LPA. Metro has published refined cost estimates, concurrent with the Final EIR.

Submission 68 Jan Kurth

68-1 The commenter's preference for the Hawthorne Option is noted. All comments have been shared with the Metro Board for their consideration. The width of the Metro ROW varies throughout the corridor and thus the distances between rail tracks and property lines varies along the corridor. All light rail and freight tracks are designed according to Metro's design criteria with appropriate clearances, which includes space for maintenance. See Appendix 2-A, Select Advanced Conceptual Engineering Drawings, of the Draft EIR and Final EIR Appendix B, Select Advanced Conceptual Engineering Drawings - Locally Preferred Alternative, for more details on the placement of relocated freight and light rail tracks, including specific design clearances.

The presence of natural gas lines and petroleum pipelines, their potential impacts, and applicable regulatory requirements are addressed in Sections 3.9, Hazards and Hazardous Materials, and 3.11 Utilities and Service System, of the Draft EIR. Potential impacts of the

LPA in this context are evaluated in Chapter 4, Evaluation of Alternatives, of the Draft EIR. In addition, Section 4.13, Corrections and Additions, of the Final EIR expands on the analysis in Section 3.9-4.2.1 of the Draft EIR by clarifying the protocols, construction techniques, regulations, and standards with which the project would comply. As detailed therein, these clarifications do not change the Draft EIR's conclusion that impacts related to oil and gas pipelines would be less than significant. See MR-7: Utility Relocation and Hazardous Materials Safety and MR-13: Soil Stability and Sinkholes.

68-2 See response to Comment 68-1. Metro has been and would continue to coordinate with all utility owners. A Draft EIR is not required or intended to provide precise utility mapping for design purposes. However, the cross-sections in the Draft EIR provide sufficient information to identify the location and general configuration of utilities within the ROW for the purposes of environmental analysis. It is important to note that some utility information, including detailed locations and specifications, is not publicly disclosed due to confidentiality and security considerations. However, the level of detail provided in the Draft EIR allows for adequate evaluation of potential environmental impacts associated with pipeline relocation, including temporary construction-related emissions, disruptions to roadway circulation, and possible service interruptions. These impacts were analyzed conservatively to account for uncertainties inherent in conceptual design.

68-3 Section 3.11-3.6 on page 3.11-18 of the Draft EIR accurately states, "There are numerous privately-owned oil pipelines located within the Resource Study Area (RSA). Owners of the oil pipelines are Crimson Pipeline, Chevron, Shell, and Plains All American. There are no publicly owned oil pipeline utility infrastructures in the RSA." Page 3.9-16 of Section 3.9, Hazards and Hazardous Materials, of the Draft EIR, also states that "Oil and gas pipelines including a 10-inch Shell crude oil, 8-inch ExxonMobil jet fuel, and 20-inch Chevron gas lines run within the Metro ROW." This sentence has been added to Section 3.11-3.6 of Chapter 3, Design Refinements, Corrections and Additions, of the Final EIR. This revision does not change the meaning or conclusions of the Draft EIR.

68-4 See response to Comment 68-3.

68-5 An RSA is the specific geographic area in which impacts on a particular resource could occur and are therefore analyzed. Since each resource may have different geographic considerations, separate RSAs are identified for each resource type. Section 3.9, Hazards and Hazardous Materials, of the Draft EIR, defines the RSA as the project footprint, as it is the area needed to construct, operate, and maintain the project; this RSA includes the entire Metro ROW.

Section 3.11, Utilities and Service Systems, of the Draft EIR includes multiple RSAs to account for the different types of utilities involved. These RSAs are based on the utility providers' service areas.

68-6 The commenter's photos show the Metro ROW with various petroleum pipeline warning signs. All comments have been shared with the Metro Board for their consideration. See MR-7: Utility Relocation and Hazardous Materials Safety and MR-13: Soil Stability and Sinkholes.

68-7 See response to Comment 68-1. The terms “several,” “numerous,” and “including” are used in the Draft EIR to reflect the data available during the environmental analysis phase, which is based on ACE drawings and coordination with utility providers. As required by Project Feature PF-US-1: Utility identification and Coordination, the construction contractor would confirm the precise locations of all utilities, including petroleum pipelines, prior to construction activities. This process includes coordination with utility owners and the use of field verification methods, such as potholing, to ensure comprehensive identification of all utilities. These measures provide confidence that any potential conflicts with utilities would be addressed before construction begins. See MR-7: Utility Relocation and Hazardous Materials Safety for additional information.

68-8 See response to Comment 68-1.

Submission 70 Kevin Mitchell

70-1 Metro understands concerns regarding property values. However, under CEQA, economic impacts such as changes in property values are not considered environmental impacts. The Draft EIR focuses on physical environmental impacts and measures to mitigate them, as required by CEQA. To address questions and concerns on property values, Metro has prepared more information. See MR-14: Property Values and Impacts to Businesses.

While change in community character does not constitute a significant impact under CEQA, Section 3.2, Land Use, and Section 3.3, Aesthetics, of the Draft EIR, analyzes the project’s potential to physically divide communities and to affect visual quality and character. As discussed in these sections of the Draft EIR, the project would result in less than significant impacts. The potential for LPA impacts is addressed in Chapter 4, Evaluation of Alternatives, of the Draft EIR. See MR-8: Light Rail and Freight Train Safety and MR-10: Changes to Community Character.

70-2 The comment is noted for the record. All comments have been shared with the Metro Board for their consideration.

70-3 As discussed on pages 2-12 and 2-26 of the Draft EIR, freight track modifications would be necessary to implement the Metro ROW alignments. Existing freight tracks would be shifted within the Metro ROW to accommodate the light rail tracks; the distances vary depending on the location. However, the freight track modifications would not encroach into residential properties, and the project is designed to avoid displacement of residents. Additionally, the proposed freight track modifications would be completed in accordance with applicable Federal Railroad Administration regulations and Metro’s stringent design criteria, ensuring the new design meets modern safety requirements for both freight and light rail operations. See MR-8: Light Rail and Freight Train Safety and MR-20: Proximity Impacts of Relocated Freight Tracks. In Spring of 2025, Metro conducted a survey of property boundaries. That information is reflected in the Final EIR Appendix B, Select Advanced Conceptual Engineering Drawings - Locally Preferred Alternative. Metro would continue with property owners as design progresses.

70-4 The presence of natural gas lines and petroleum pipelines, their potential impacts, and applicable regulatory requirements are addressed in Sections 3.9, Hazards and Hazardous Materials, and 3.11 Utilities and Service System, of the Draft EIR. Potential impacts of the LPA in this context are evaluated in Chapter 4, Evaluation of Alternatives, of the Draft EIR. In addition, Section 4.13, Corrections and Additions, of the Final EIR expands on the analysis in Section 3.9-4.2.1 of the Draft EIR by clarifying the protocols, construction techniques, regulations, and standards with which the project would comply. As detailed therein, these clarifications do not change the Draft EIR's conclusion that impacts related to oil and gas pipelines would be less than significant. See MR-7: Utility Relocation and Hazardous Materials Safety and MR-13: Soil Stability and Sinkholes.

70-5 The comment copies the oil and gas pipeline analysis from the Draft EIR. All comments have been shared with the Metro Board for their consideration.

70-6 Metro takes the safety and well-being of nearby communities very seriously. Every aspect of the project has been and would continue to be designed to address potential risks and ensure that construction and operation are conducted safely. See MR-7: Utility Relocation and Hazardous Materials Safety, MR-8: Light Rail and Freight Train Safety, and MR-13 Soil Stability and Sinkholes.

70-7 The commenter's support for the Hawthorne Option and opposition to the Metro ROW alignment is noted. All comments have been shared with the Metro Board for their consideration. See response to Comment 70-1.

Submission 71 Bob Cutler

71-1 Submission 63 includes the same comments from the same commenter. See response to Comment 63-1.

Submission 72 S Martin

72-1 The commenter's opposition to the project is noted. All comments have been shared with the Metro Board for their consideration. The comment does not raise any significant environmental issues or specific concerns related to the EIR analysis. See MR-9: Light Rail Security and MR-18: Homelessness.

Submission 73 Irene Evans

73-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 74 Todd Bassman

74-1 The commenter's support for the Hawthorne Option is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives. The 2023 Ridership Summary Report, published alongside the Draft EIR, includes ridership estimates for each alignment option. See MR-10: Changes to Community Character.

Submission 75 Yumiko Omatsu

75-1 Metro takes the safety and well-being of nearby communities very seriously. Before making a final determination on the project, the Metro Board will review the comments and responses included in the Final EIR and will consider multiple factors, including environmental impacts, benefits and costs.

75-2 Potential noise and vibration impacts are addressed in Section 3.6, Noise and Vibration, of the Draft EIR. The potential for LPA impacts is addressed in Chapter 4, Evaluation of Alternatives, of the Draft EIR. See MR-2: Operational Noise Analysis Methodology and Impact Thresholds; MR-3: Operational Noise Project Features and Mitigation Measures; MR-4: Potential Negative Health Effects Related to Noise, Vibration, and Air Quality; MR-5: Vibration Impact Types and Impact Thresholds; MR-6: Vibration Analysis During Final Design, and MR-7: Utility Relocation and Hazardous Materials Safety. While privacy is not considered an environmental impact under CEQA, Metro understands that this may be a concern for residents and is committed to minimizing potential intrusions where feasible. During construction, activities near residential properties, including work on the berm, would be temporary and limited to specific phases of construction. Construction contractors would adhere to standard codes of conduct to ensure professional behavior on construction sites. During operation, privacy impacts from the light rail vehicles themselves are expected to be minimal. Trains would be in motion and would not stop or slow near residential properties, greatly limiting opportunities for riders or operators to observe private activities. In addition, light rail vehicles are generally enclosed and would be elevated or grade-separated, further reducing the potential for visual intrusion.

75-3 See MR-10: Changes to Community Character.

Submission 76 Yumiko Omatsu

76-1 Submission 76 includes the same comments from the same commenter. See responses to Submission 75.

Submission 77 Courtney Allen

77-1 The commenter's support for the Hawthorne Option is noted. All comments have been shared with the Metro Board for their consideration. See MR-10: Changes to Community Character and MR-16: Response to Lawndale and Redondo Beach Community Letter.

Submission 78 David Clasby

78-1 The commenter's opposition to the Metro ROW alignment is noted. All comments have been shared with the Metro Board for their consideration. Potential noise impacts are addressed in Section 3.6, Noise and Vibration, of the Draft EIR. The potential for LPA impacts is addressed in Chapter 4, Evaluation of Alternatives, of the Draft EIR. See MR-2: Operational Noise Analysis Methodology and Impact Thresholds; MR-3: Operational Noise Project Features and Mitigation Measures; and MR-4: Potential Negative Health Effects Related to Noise, Vibration, and Air Quality.

78-2 Metro has designed the project to avoid displacement of residents. See the 2023 Real Estate Acquisition Report, published concurrently with the Draft EIR, and the 2025 Real Estate Acquisition Report, published concurrently with this Final EIR for more detailed information on proposed property acquisitions. Metro understands concerns regarding property values. However, under CEQA, economic impacts such as changes in property values are not considered environmental impacts. The Draft EIR focuses on physical environmental impacts and measures to mitigate them, as required by CEQA. To address questions and concerns on property values, Metro has prepared more information. See MR-14: Property Values and Impacts to Businesses.

78-3 Metro owns the ROW, which is an existing railroad corridor, and its use is not subject to U.S. Environmental Protection Agency jurisdiction. As discussed in Section 3.6, Noise and Vibration, of the Draft EIR, Mitigation Measure MM-NOI-2: Soundwalls requires soundwalls and other source-based measure to reduce operational noise impacts to less than significant levels with mitigation for the LPA, the Trench Option and Hawthorne Option. No additional mitigation measure would be required for those alignments. Although the Elevated/At-Grade Alignment would result in a significant and unavoidable operational noise impact, retrofitting residences with sound-insulating windows is not considered a feasible mitigation measure. Such an approach would require property-by-property assessments, extensive coordination with property owners, significant costs, yet would still yield inconsistent and uncertain results. Metro cannot compel property owners or tenants to participate in a retrofit program, limiting its ability to ensure the measure's effectiveness. Additionally, window insulation is ineffective when windows are open, and requiring residents to keep windows closed could interfere with ventilation, comfort, and personal preference, further undermining the measure's reliability. Even with windows shut, insulation may still fail to achieve adequate noise reduction if other building components, such as unsealed doors, walls, or structural gaps, allow noise to enter. These factors make residential retrofitting an unreliable and impractical mitigation strategy. Under CEQA, mitigation measures that cannot be successfully implemented within a reasonable period of time, taking into account economic, environmental, legal, social, and technological factors, are not considered feasible. This is the case with a window retrofitting program.

Submission 79 Diane Smith

79-1 The commenter's opposition to the project is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives. Potential noise impacts are addressed in Section 3.6, Noise and Vibration, of the Draft EIR. The potential for LPA impacts is addressed in Chapter 4, Evaluation of Alternatives, of the Draft EIR. See MR-3: Operational Noise Project Features and Mitigation Measures. Metro is responsible for installing soundwalls for the project as required by Mitigation Measure MM-NOI-2: Soundwalls. As required by Mitigation Measure MM-NOI-2: Soundwalls would be installed where noise levels are predicted to exceed the Federal Transit Administration noise impact criteria.

Metro understands concerns regarding property values. However, under CEQA, economic impacts such as changes in property values are not considered environmental impacts. To

address questions and concerns on property values, Metro has prepared more information. See MR-14: Property Values and Impacts to Businesses.

79-2 The project does not propose to reduce any through traffic lanes on Hawthorne Boulevard. Some adjustments to left and right turn pockets are necessary to accommodate the project footprint without further widening and causing secondary impacts to the street width that would otherwise affect neighboring homes and businesses. As explained on page 3.1-3 of the Draft EIR, traffic delay (often measured by level of service) is no longer permissible as a CEQA impact criterion and therefore this analysis and related topics are not addressed in the Draft EIR. See MR-11: Traffic Delay and Level-of-Service and the 2023 Transportation Detail Report, published concurrently with the Draft EIR, for a discussion of traffic conditions. The LPA light rail guideway is fully grade-separated from all roadways, and would not increase vehicle delay compared to existing conditions.

Submission 80 Isobel Dozier

80-1 The commenter's support for an elevated/at-grade configuration of the project in the Metro ROW is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

80-2 Light rail has different operating requirements than freight, such as different vehicle types and power systems. Other transit vehicle technologies capable of sharing tracks with the existing freight were studied prior to the Draft EIR, and eliminated for multiple reasons. See the 2023 Alternatives Considered and Eliminated Report, published concurrently with the Draft EIR, for more details.

Regarding rebuilding the ex-Santa Fe Railway track, it is not within the scope of the project. All comments have been shared with the Metro Board for their consideration.

As described in Chapter 2, Project Description, of the Draft EIR, the Metro ROW alignments include a multi-use recreational path between Grant Avenue and 182nd Street on the east side of the light rail tracks.

Submission 81 Leslie Higginns

81-1 The commenter's opposition to the Metro ROW alignment and support for the Hawthorne Option is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Potential noise impacts are addressed in Section 3.6, Noise and Vibration, of the Draft EIR. MR-3: Operational Noise Project Features and Mitigation Measures. The potential for LPA impacts is addressed in Chapter 4, Evaluation of Alternatives, of the Draft EIR. See MR-4: Potential Negative Health Effects Related to Noise, Vibration, and Air Quality and MR-9: Light Rail Security.

Potential air quality impacts are addressed in Section 3.4, Air Quality, of the Draft EIR, including dust control during construction. Compliance with Project Features PF-AQ-1: Tier 4 Engine Standards and PF-AQ-2: Dust Control Best Practices would ensure that

construction activities comply with South Coast Air Quality Management District and Metro standards controlling emissions and dust. Operationally, the light rail vehicles would be powered by electricity and would not produce localized emissions. Regional air quality would improve with implementation of the project due to a shift from passenger vehicles to light rail in the corridor.

Section 3.1, Transportation, of the Draft EIR, addresses potential transportation impacts. As detailed by Project Feature PF-T-1: Construction Traffic Management Plan, access would be maintained and disruptions reduced during construction. As explained on page 3.1-3 of the Draft EIR, traffic delay (often measured by level of service) is no longer permissible as a CEQA impact criterion and therefore this analysis and related topics are not addressed in the Draft EIR. See MR-11: Traffic Delay and Level-of-Service and the 2023 Transportation Detail Report, published concurrently with the Draft EIR, for a discussion of traffic conditions. The LPA is fully grade-separated from all roadways, and would not increase vehicle delay compared to existing conditions.

Submission 82 can be found in Section 5.3 Responses to Public Agencies

Submission 83 Steven Boll

83-1 The commenter's support for the Hawthorne Option is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives. The potential for noise and vibration impacts for the Elevated/At-Grade Alignment, the Trench option, and the Hawthorne Option are addressed in Section 3.6, Noise and Vibration, of the Draft EIR. The potential for LPA impacts is addressed in Chapter 4, Evaluation of Alternatives, of the Draft EIR. The Metro ROW alignments would include upgrades to existing freight crossings, allowing for the establishment of a Federal Railroad Administration quiet zone. This would eliminate routine freight train horn noise along the Metro ROW in the area. See MR-3: Operational Noise Project Features and Mitigation Measures. As described in Section 3.6, implementation of Mitigation Measures MM-VIB-3: Pre- and Post-Construction Surveys through MM-VIB-6: Ballast Mats would reduce operational vibration impacts for the Metro ROW alignments to less than significant with mitigation.

83-2 Metro has designed the project to avoid displacement of residents. Metro understands concerns regarding property values. However, under CEQA, economic impacts such as changes in property values are not considered environmental impacts. The Draft EIR focuses on physical environmental impacts and measures to mitigate them, as required by CEQA. To address questions and concerns on property values, Metro has prepared more information. See MR-14: Property Values and Impacts to Businesses.

Potential impacts associated with construction noise and vibration are addressed in Section 3.6, Noise and Vibration, of the Draft EIR. The project includes extensive mitigation measures to minimize effects. See response to Comment 83-1, MR-5: Vibration Impact Types and Impact Threshold; and MR-6: Vibration Analysis During Final Design.

Construction debris and waste materials would be properly transported and disposed of in accordance with federal, state, and local regulations, as described in Section 3.9, Hazards and Hazardous Materials, of the Draft EIR.

As discussed in Section 3.8, Geology and Soils, of the Draft EIR, the project design process would include thorough site geotechnical investigations to ensure the stability of nearby structures. Per Project Feature PF-GEO-1: Metro Geotechnical Design Standards, site-specific geotechnical investigations would be conducted to address foundation and structural safety. The investigation would include engineering and construction recommendations to ensure surrounding structures are not damaged.

83-3 The commenter's support for the Hawthorne Option is noted. All comments have been shared with the Metro Board for their consideration.

Submission 84 can be found in Section 5.3 Responses to Public Agencies

Submission 85 Vickie Vega

85-1 Metro has designed the project to avoid displacement of residents. See the 2023 Real Estate Acquisition Report, published concurrently with the Draft EIR, and the 2025 Real Estate Acquisition Report, published concurrently with this Final EIR for more detailed information on proposed property acquisitions. The width of the Metro ROW varies throughout the corridor and thus the distances between rail tracks and property lines varies along the corridor. All light rail and freight tracks are designed according to Metro's design criteria with appropriate clearances, which includes space for maintenance. See Appendix 2-A, Select Advanced Conceptual Engineering Drawings, of the Draft EIR and Final EIR Appendix B, Select Advanced Conceptual Engineering Drawings - Locally Preferred Alternative, for more details on the placement of relocated freight and light rail tracks, including specific design clearances.

85-2 The commenter's support for the Hawthorne Option is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

85-3 As a point of clarification, while it is accurate that portions of the freight track in the City Torrance primarily pass through commercial and industrial areas, there are also residential properties adjacent to the existing freight track in the City of Torrance, primarily between 182nd and 190th Streets.

The Draft EIR fully assesses potential construction and operational impacts, including noise, air quality, and vibration, for all alignment options. These analyses are set forth in Section 3.6, Noise and Vibration, and Section 3.4, Air Quality, of the Draft EIR. Mitigation Measures MM-NOI-1: Noise Control Plan and MM-NOI-2: Soundwalls would be implemented to minimize noise and vibration impacts for sensitive receptors, including residents adjacent to Metro ROW. Project Feature PF-AQ-2: Dust Control Best Practices would ensure construction complies with best available control technology to control emissions and dust during construction. The potential for LPA impacts is addressed in Chapter 4, Evaluation of Alternatives, of the Draft EIR.

The LPA and Trench Option would significantly reduce operational noise impacts compared to the Elevated/At-Grade Alignment because they eliminate the at-grade crossings at 170th and 182nd Streets. By grade separating the light rail from all roadways, the LPA, Trench Option, and Hawthorne Option, avoid the need for audible warning at light rail crossings, such as routine train horns and crossing bells. As described in Chapter 4, Evaluation of Alternatives, of the Draft EIR and Chapter 2, Description of the Locally Preferred Alternative, of the Final EIR, the operational noise impacts of the LPA would be comparable to those of the Trench Option and would be less than significant with mitigation.

The frequency of freight operations on the Metro ROW is determined by BNSF, subject to existing agreements and applicable regulatory constraints. Metro does not control the freight train schedule or operations but coordinates with BNSF to ensure continued safe and efficient use of the Metro ROW. The Draft EIR's analysis of freight train operations is based on existing operating patterns, developed in consultation with BNSF and based on observed conditions. While BNSF has the right to operate within the Metro ROW, any substantial increase in freight traffic would require major infrastructure modifications, scheduling adjustments, and regulatory approvals (e.g., from the Federal Railroad Administration (FRA) and the California Public Utilities Code (CPUC)) that are not reasonably foreseeable at this time. The project would replace freight tracks as needed, in kind, with newer tracks, but it would not increase track capacity. The demand for freight movement along this corridor has remained stable for years, and no changes to freight operation are anticipated.

Under the Metro ROW alignments, the project would upgrade existing freight crossings to be "quiet zone" ready (see Project Feature PF-NV-1: Quiet Zone Equipment Installation). Pursuant to Mitigation Measure MM-NOI-4: Quiet Zone Establishment, Metro would assist the local cities to establish a quiet zone from north of Inglewood Avenue to south of 182nd Street. The establishment of a Quiet zone would reduce overall freight train noise levels compared to existing conditions by eliminating the need for train horns, which produce noise levels of up to 110 dBA (a-weighted decibel). See MR-3: Operational Noise Project Features and Mitigation Measures and MR-4: Potential Negative Health Effects Related to Noise, Vibration, and Air Quality.

85-4 The commenter is correct; the Metro Board of Directors is the decision-making body for the project. The Metro Board will consider certifying the Final EIR and approving the project in 2025 with consideration of all public comments and feedback received from public engagement throughout the environmental review process.

85-5 Appendix 2-A of the Draft EIR includes cross-sections showing the general location and configuration of utilities, including petroleum pipelines, within the Metro ROW. These cross-sections provide sufficient detail for environmental analysis, but are not intended to provide exact locations, depths, or specifications, as such information is not typically disclosed publicly due to confidentiality and security concerns.

The specific installation date, inspection schedule, and repair history of the fuel pipelines are managed by the pipeline operator in compliance with regulations overseen by agencies such as the California State Fire Marshal and the U.S. Department of

Transportation's Pipeline and Hazardous Materials Safety Administration. Questions about inspection and maintenance schedules, including the date of the last inspection or repair, should be directed to the pipeline operator or the relevant regulatory agency.

As described in Section 3.11, Utilities and Service Systems, of the Draft EIR, Project Feature PF-US-1: Utility Identification and Coordination requires the construction contractor to verify the locations of all utilities potentially affected by construction activities before work begins. This includes conducting field verification (e.g., potholing) and coordinating with utility providers to determine setbacks and protection or relocation measures. See MR-7: Utility Relocation and Hazardous Materials Safety for additional information.

85-6 See MR-8: Light Rail and Freight Train Safety.

85-7 The commenter's support for the Hawthorne Option is noted. All comments have been shared with the Metro Board for their consideration.

85-8 Metro has worked diligently to develop feasible and effective mitigation measures to address the potentially significant impacts of the project. See MR-4: Potential Negative Health Effects Related to Noise, Vibration, and Air Quality and MR-10: Changes to Community Character.

85-9 Metro is aware of the Friendship Campus, which is currently under construction and located approximately 550 feet from the Metro ROW at its nearest point. The presence of this new school facility has been acknowledged in Section 4.13, Corrections and Additions, of the Final EIR. The presence of the Friendship Campus within a quarter-mile of the project footprint does not result in any new significant impact or substantially more severe significant impacts beyond what was identified in the Draft EIR.

Although the under-construction Friendship Campus was not specifically modeled in the Draft EIR, its location approximately 550 feet from the Metro ROW is beyond the distances used for identifying significant noise and vibration impacts. According to FTA guidance and the modeling presented in Section 3.6, Noise and Vibration, of the Draft EIR, groundborne vibration impacts are typically limited to areas within 100 feet of the tracks, and noise-sensitive impacts to schools are based on interior noise levels, which decrease significantly with distance. During construction, activities generating high noise or vibration levels would be temporary and intermittent, and typically limited to work areas much closer to the alignment. As described in the Draft EIR, construction vibration and noise levels attenuate rapidly with distance, and at a setback of over 500 feet, the Friendship Campus would not be expected to experience levels that exceed FTA thresholds for significance. Therefore, both construction and operational noise and vibration impacts to the Friendship Campus are expected to be less than significant with mitigation. Furthermore, the project would implement Mitigation Measures MM-NOI-2: Soundwalls and MM-NOI-3: Low Impact Frogs to reduce noise levels, and MM-NOI-4: Quiet Zone Establishment, which would collectively reduce noise levels for affected sensitive receptors.

Nor would construction of any of the alignments cause a significant air quality impact to the Friendship Campus. Although the Trench Option would result in a significant and

unavoidable regional NOx impact, that impact is based on region-wide pollutant emissions and does not reflect localized pollutant concentrations at specific receptor sites. As explained in Section 3.4-4.11, of the Draft EIR, localized impacts from construction emissions, including those related to particulate matter (PM10 and PM2.5) and carbon monoxide (CO), would not exceed applicable South Coast Air Quality Management District (SCAQMD) significance thresholds. Therefore, the project would not expose sensitive receptors at that location to substantial pollutant concentrations during construction.

In addition, as discussed in Section 3.9-4.3 of the Draft EIR, the project includes Project Features such as PF-HHM-2: Demolition Plans, PF-AQ-1: Metro Green Construction Policy Compliance, and PF-HHM-1: Handling, Storage, and Transport of Hazardous Materials and Wastes. These features are integral components of the project and reflect standard practices Metro incorporates into its construction activities. The Draft EIR concludes that the project as proposed, including Project Features PF-HHM-2: Demolition Plans, PF-AQ-1: Metro Green Construction Policy Compliance, and PF-HHM-1: Handling, Storage, and Transport of Hazardous Materials and Wastes, impacts related to hazardous materials near existing schools would be less than significant.

For these reasons, the proximity of the under-construction Friendship Campus does not change the technical conclusions or impacts determinations presented in the Draft EIR. The analyses remain valid for all sensitive receptors within the project vicinity, including this facility.

85-10 The commenter's opposition to the Metro ROW alignment is noted. All comments have been shared with the Metro Board for their consideration.

85-11 The commenter's support for the Hawthorne Option is noted. All comments have been shared with the Metro Board for their consideration.

Submission 86 can be found in Section 5.4 Responses to Groups and Organizations

Submission 87 Janet Lindquist

87-1 Submission 12 includes the same comment from the same commenter. See response to Comment 12-1.

Submission 88 Dr. Eric Homier

88-1 Submission 36 includes the same comments from the same commenter. See responses to Submission 36.

Submission 89 Eugene Balfour

89-1 The commenter's support for the Hawthorne Option is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

89-2 See response to Comment 89-1. The LPA would be fully grade-separated from all roadways.

Submission 90 Thelma Mericle

90-1 The project simulation video is intended to provide a high-level overview of the alignments studied in the Draft EIR, with buildings shown in white to represent their general location. The video is not intended to depict the full details of existing or planned structures. Metro would preserve existing trees where possible and plant new trees and landscaping, per Metro's tree replacement policy, as described in Section 3.7, Biological Resources, of the Draft EIR. While new plantings cannot fully replace mature trees in the near-term, the policy aims to restore greenery in affected areas. The potential for LPA impacts is addressed in Chapter 4, Evaluation of Alternatives, of the Draft EIR.

With respect to ridership, the 2023 Ridership Report, published concurrently with the Draft EIR, projects between 11,500 to 15,600 daily transit trips (boardings) in 2045. Metro continues to expand its transit network to provide viable alternatives to car travel and reduce traffic congestion in the region. See MR-15: Metro Ridership Forecasting Methodology.

Metro prepared cost estimates in 2022 for all rail alignments and shared them with the Metro Board at the May 2024 Board meeting. The cost estimate for the LPA at the time was $2.23B. Metro is continuing to refine the cost estimate as design progresses, and will provide an update to the Metro Board when the Final EIR is completed; see MR-21: Cost Estimates and Schedule.

Submission 91 Gretchen Gerull

91-1 The commenter's support for the Hawthorne Option is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives. Similar to the Hawthorne Option, the LPA and Trench Option would fully grade separate the light rail from all roadways.

As explained on page 3.1-3 of the Draft EIR, traffic delay (often measured by level of service) is no longer permissible as a CEQA impact criterion, and therefore this analysis and related topics are not addressed in the Draft EIR. See MR-11: Traffic Delay and Level-of-Service and the 2023 Transportation Detail Report, published concurrently with the Draft EIR, for a discussion of traffic conditions. The LPA is fully grade-separated from all roadways, and would not increase vehicle delay compared to existing conditions.

The potential for noise and vibration impacts is assessed in Section 3.6, Noise and Vibration, of the Draft EIR. The Metro ROW alignments include upgrades to existing freight crossings, allowing for the establishment of a Federal Railroad Administration quiet zone. As discussed in Section 4.10, Corrections and Additions, of the Final EIR, the LPA would reduce operational noise impacts to a less than significant level with mitigation, and would include quiet zone ready improvements at the existing freight crossings, which would allow for the elimination of freight horns throughout the corridor. This is also the case for the Trench Option. See MR-3: Operational Noise Project Features and Mitigation Measures.

Metro has designed the project to avoid displacement of residents. See the 2023 Real Estate Acquisition Report, published concurrently with the Draft EIR, and the 2025 Real Estate Acquisition Report, published concurrently with this Final EIR for more detailed information on proposed property acquisitions. See MR-10: Changes to Community Character. See MR-10: Changes to Community Character.

Submission 92 Grace Peng, PhD

92-1 Submission 20 includes the same comments from the same commenter. See responses to Submission 20.

Submission 93 Mark Johnston

93-1 Freight trains today terminate at the Chevron El Segundo Refinery north of the project.

93-2 The commenter's support for the Metro ROW alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

93-3 As discussed in Section 3-6, Noise and Vibration, of the Draft EIR, the project includes Mitigation Measure MM-NOI-2: Soundwalls to reduce noise impacts to a less than significant level with mitigation. For the Metro ROW alignments, the project would enable local cities to establish Quiet Zones with Federal Rail Administration (FRA), as part of Project Feature PF-NV-1: Quiet Zone Equipment Installation and Mitigation Measure MM-NOI-4: Quiet Zone Establishment. The potential for LPA impacts is addressed in Chapter 4, Evaluation of Alternatives, of the Draft EIR. See MR-3: Operational Noise Project Features and Mitigation Measures.

93-4 When the project opens, it would operate as part of the K Line, traveling north-south between the Expo/Crenshaw Station Line and the proposed station at Torrance. It would connect to the LAX/Metro Transit Station, providing service to LAX. The C (Green) Line currently travels east/west between the LAX/Metro Transit Station and the Norwalk Station.

93-5 The commenter's support for the project is noted. All comments have been shared with the Metro Board for their consideration.

Submission 94 can be found in Section 5.3 Responses to Public Agencies

Submission 95 can be found in Section 5.4 Responses to Groups and Organizations

Submission 96 Yumiko Omatsu

96-1 The commenter's photos show the Metro ROW in Redondo Beach and adjacent areas. This comment and the photos are noted. All comments have been shared with the Metro Board for their consideration.

Submission 97 Ashley Neff

97-1 The commenter's opposition to the Metro ROW alignment and the Trench Option, and support for the Hawthorne Option, is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

97-2 Washington Elementary School and Adams Middle School are located approximately 1,200 feet from the Metro ROW. At these distances, noise from light rail operations and construction activities would be attenuated to levels below thresholds of significance due to the dissipation of sound energy over distance and the presence of intervening structures that further buffer noise. Similarly, vibration generated by the project during both construction and operations would have dissipated at the distances where the schools are located. The resource study areas for both noise and vibration are described in Section 3.6-2.1, Noise and Vibration, of the Draft EIR. The maximum area of analysis considered is approximately 500 feet. The schools are well outside of this distance. Additionally, as explained Section 3.6 in the Draft EIR, the project would implement Mitigation Measures MM-NOI-2: Soundwalls and MM-NOI-3: Low Impact Frogs to reduce noise levels, and MM-NOI-4: Quiet Zone Establishment, which would collectively reduce noise levels for affected sensitive receptors (which the foregoing schools are located beyond). It should be noted that for the ROW alignments, the Draft EIR concluded that noise impacts, including to some homes within proximity to the Metro ROW, would be significant and unavoidable, even with these mitigation measures. However, for the LPA, and the Trench Option, operational noise impacts would be reduced to less than significant with mitigation. The potential for LPA impacts is addressed in Chapter 4, Evaluation of Alternatives, of the Draft EIR.

Section 3.4, Air Quality, of the Draft EIR, analyzes the localized pollutant emissions during construction. Construction of each alignment option under consideration would not generate emissions in excess of the South Coast Air Quality Management District (SCAQMD) localized significance thresholds. For additional details, see Section 3.4-4.3.1 of the Draft EIR and Chapter 2, Description of Locally Preferred Alternative, of the Final EIR. The localized emissions analysis presented in Table 3.4-21 of the Draft EIR evaluated sensitive receptors within 50 feet of the construction zone, which is much closer than the schools referenced in the comment. See the analyses and conclusions therein. Based on the results of the localized screening analysis, students and faculty at Washington Elementary School and Adams Middle School would not experience significant air quality impacts related to pollutant exposures. The same can be said of residents with homes adjacent to the alignment construction zone in eastern portions of Redondo Beach and in the City of Lawndale, as the localized emissions analysis utilized the most conservative and protective thresholds published by the SCAQMD.

Metro is committed to integrating safety into all Metro rail operations. The project would comply with relevant safety standards, including the California Manual on Uniform Traffic Control Devices, the California Department of Transportation Highway Design Manual, the Americans with Disabilities Act, and Metro's Grade Crossing Safety Policy. The LPA light rail guideway would be fully grade-separated from all roadways, thereby avoiding potential conflicts with pedestrians or cyclists. The presence of a station could also benefit

access to schools for residents and parents. See MR-8: Light Rail and Freight Train Safety and MR-9: Light Rail Security.

97-3 The commenter's preference for the Hawthorne Option is noted. All comments have been shared with the Metro Board for their consideration. As discussed in Chapter 3, Affected Environment and Environmental Impact Analyses, of the Draft EIR, alignments on the Metro ROW and on Hawthorne Boulevard could both result in significant impacts, though most could be mitigated to less than significant.

Submission 98 Mark Nelson

98-1 The existing Metro ROW is a current active railroad corridor and that land use would not change with implementation of the project. The potential for aesthetic impacts is addressed in Section 3.3, Aesthetic, of the Draft EIR. See MR-10: Changes to Community Character. The potential for LPA impacts is addressed in Chapter 4, Evaluation of Alternatives, of the Draft EIR.

98-2 The Metro ROW is not recognized or protected as a visual resource by any local, regional or state policies; as described in Section 3.3, Aesthetics, of the Draft EIR, there no visual resources within this area, and there are no unique views of the local mountains or coastline, and no protected views. The project would alter the visual character of the area, but would not degrade the visual character and quality.

The South Bay Cities Council of Governments 2002 Study identifies this portion of the Harbor Subdivision as an area where a pedestrian or bike trail could be implemented. As part of this project, multi-use recreational paths would be added in several parts of the corridor, which would provide safe paths for recreational users.

This project has been public knowledge for over 15 years: Metro first began studying a transit option within this corridor in 2008. Multiple studies have been published since then, with public outreach included with each phase of the study.

The South Bay Cities Council of Governments and BNSF do not have jurisdiction or property rights to convert the Metro ROW from its current use as a railroad corridor. Any study by these entities would be informational only.

For clarification, although the 2002 South Bay Cities Rail Study acknowledges the potential for alternative uses in the Metro ROW, the report clearly states that "Freight rail operations will continue on the Harbor Subdivision" (Section 4.1.2), Additionally, the study recognizes that any uses of the Metro ROW "must incorporate freight rail operations" Section 4.1.5). Metro is explicitly mentioned as studying the potential use of the corridor for transit, including the Green Line extension to LAX. Therefore, while a linear green space was one of several concepts considered in the study, it was never proposed as a definitive or standalone use for the Metro ROW. The study consistently emphasized the continued use of the Metro ROW for freight operations and acknowledged Metro's exploration of transit options along the corridor.

98-3 Section 3.3, Aesthetics, of the Draft EIR, includes both visual simulations and a detailed discussion of the changes in ground-level conditions and above-ground features. For

example, the visual simulations presented and discussed in Section 3-4.3.2 illustrate before-and-after views of areas along the Metro ROW, including changes to roadway surfaces, medians, and ground-level elements within the Metro ROW. These simulations are intended to provide a conservatively realistic portrayal of the project's visual impact from publicly accessible locations.

Specific to the Trench Option, pages 3.3-86 and page 3.3-88, discuss visible changes such as freight crossing gates, signage, safety fencing, the trench, and in some cases soundwalls. These elements would also apply to the trench segment of the LPA; see Chapter 2, Description of the Locally Preferred Alternative, of the Final EIR.

Regarding the commenter's preference for native grass, landscaping for the project would comply with Metro's Tree Preservation Policy, which prioritizes native vegetation. Details regarding landscaping improvements would be further defined during the design phase. Also, Metro would engage communities as applicable in the design process.

98-4 Chapter 2, Project Description, Tables 2.4-1 through 2.4-3 of the Draft EIR and Chapter 2, Description of the Locally Preferred Alternative, Table 2.4-1 of the Final EIR show the durations of the various construction activities required to build the project. As shown, there is no individual construction activity that would last the full duration of the construction period. Instead, construction activities would proceed in phases and occur at different locations along the alignment, limiting the intensity of activities in any one area at a given time.

Regarding the aesthetic impacts of construction, Section 3.3 of the Draft EIR acknowledges temporary visual changes associated with construction activities, including the presence of equipment, materials, and workers. These impacts would be temporary and would cease once construction is completed. Additionally, the project includes Project Features PF-AQ-1: Metro Green Construction Policy Compliance and PF-AQ-2: SCAQMD Rule 403 Compliance, which would ensure the project implement best management practice to limit dust and particulate matter, which would minimize any potential for visible "brown clouds." Other project features and mitigation measures that would address potential construction-related nuisances include Project Feature PF-T-1: Construction Traffic Management Plan and Mitigation Measure MM-NOI-1: Noise Control Plan. See MR-4: Potential Negative Health Effects Related to Noise, Vibration, and Air Quality. In addition, construction fencing would be installed prior to work beginning, which would assist limiting views into private homes.

Regarding the concern about workers being on a higher-grade berm than the commenter's wall, while privacy is not considered an environmental impact under CEQA, Metro understands that this may be a concern for residents, and is committed to minimizing potential intrusions where feasible. During construction, activities near residential properties, including work on the berm, would be temporary and limited to specific phases of construction. Construction contractors would adhere to standard codes of conduct to ensure professional behavior on construction sites. During operation, privacy impacts from the light rail vehicles themselves are expected to be minimal. Trains would be in motion and would not stop or slow near residential properties, greatly limiting opportunities for riders or operators to observe private activities. In addition, light

rail vehicles are generally enclosed and would be elevated or grade-separated, further reducing the potential for visual intrusion. Metro would continue to evaluate ways to minimize disruptions in accordance with applicable legal requirements and as part of the project's ongoing planning and outreach efforts.

98-5 The commenter's concerns about the length of the environmental review process are noted. Metro understands that major infrastructure projects can be complex and, at times, stressful to affected communities. Metro appreciates the time and effort that residents have put into participating in the public review process. All comments have been shared with the Metro Board for their consideration. Metro has worked diligently to develop feasible and effective mitigation measures to address the potentially significant impacts of the project. Chapter 3, Affected Environment and Environmental Impact Analyses, of the Draft EIR analyzes the impacts that would occur during construction, and identifies mitigation measures that would be required to reduce impacts. See MR-10: Changes to Community Character.

98-6 The commenter's support for the Hawthorne Option is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 99 Akemi Pradhan

99-1 The commenter's opposition to the Metro ROW alignment and preference for the Hawthorne Option is noted. As described in Section 3.6, Noise and Vibration, of the Draft EIR, Metro would implement mitigation measures such as Mitigation Measures MM-NOI-2: Soundwalls and MM-NOI-3: Low Impact Frogs to reduce operation noise levels at adjacent residential properties to meet Federal Transit Administration thresholds for residential areas. See MR-3: Operational Noise Project Features and Mitigation Measures. The vibration analysis in Section 3.6, Noise and Vibration, of the Draft EIR concluded that, with implementation of Mitigation Measures MM-VIB-4: Low Impact Frogs, MM-VIB-5: Resilient Fasteners, and MM-VIB-6: Ballast Mats vibration impacts caused by the light rail and realigned freight tracks would not exceed Federal Transit Administration (FTA) thresholds for human damage or human annoyance. The potential for LPA impacts is addressed in Chapter 4, Evaluation of Alternatives, of the Draft EIR.

See MR-7: Utility Relocation and Hazardous Materials Safety and MR-8: Light Rail and Freight Train Safety.

Metro respects the cultural and community concerns raised in the comment. See MR-10: Changes to Community Character.

Submission 100 Holly Osborne

100-1 A covered trench could be built with special ventilation located approximately every 1,000 feet. More detailed studies would be needed to confirm the design for this scenario if this was directed by the Metro Board.

Submission 101 Holly Osborne

101-1 Submission 100 includes the same comment from the same commenter. See the response to Submission 100.

Submission 102 Kylee Kirby

102-1 The commenter's opposition to the project within Lawndale is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 103 Marvin E. Badawi

103-1 The commenter's support for the Hawthorne Option is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Metro understands concerns regarding property values. However, under CEQA, economic impacts such as changes in property values are not considered environmental impacts. The Draft EIR focuses on physical environmental impacts and measures to mitigate them, as required by CEQA. To address questions and concerns on property values, Metro has prepared more information. See MR-14: Property Values and Impacts to Businesses.

Submission 104 Joanna Velazco

104-1 The commenter's support for the Hawthorne Option is noted. As discussed in Section 3.2, Land Use and Planning, of the Draft EIR, the project would replace or repair existing security fencing and add soundwalls in some locations, which would limit unauthorized access into the Metro ROW to ensure safety near operating rail. However, this does not constitute physically dividing a community, because residents would still be able to cross the ROW at all existing designated rail crossings located at Inglewood Avenue, Manhattan Beach Boulevard, 159th, 160th, 161st, 162nd, 170th, and 182nd Streets. Land uses would not be altered so as to isolate any one part of the community from the other. The Metro ROW is not recognized or protected as a scenic vista by any local, regional, or state policies. The potential for LPA impacts is addressed in Chapter 4, Evaluation of Alternatives, of the Draft EIR.

104-2 As part of the Elevated/At-Grade Alignment, there are two potential at-grade rail crossings located at 170th and 182nd Streets. All other streets in the project area would have light rail movement separated from vehicular and pedestrian activity with either an elevated rail structure or a below-grade trench. As described in Chapter 2, Project Description, of the Draft EIR, freight and at grade crossings would feature gates and other crossing protection, and pedestrian upgrade on both sides of the tracks and street, including a continental striped crosswalk. The LPA light rail guideway would be fully grade-separated from all roadways. See MR-1: Selection of Alternatives.

104-3 Section 3.7, Biological Resources, of the Draft EIR, discusses implementation of mitigation measures that include general protection measures to avoid and minimize impacts on

sensitive biological resources and nesting bird season restrictions, and pre-construction surveys. Potential visual impacts are addressed in Section 3.3, Aesthetics, of the Draft EIR.

Submission 105 Eugene Balfour

105-1 Submission 89 includes the same comments from the same commenter. See the response to Submission 89.

Submission 106 Tara

106-1 The Metro Board will consider certifying the Final EIR and approving the project in 2025 with consideration of all public comments and feedback received from public engagement throughout the environmental review process. There is not a voting process to approve the project.

106-2 See response to Comment 106-1. The commenter's opposition to the project is noted. All comments have been shared with the Metro Board for their consideration. See MR-9: Light Rail Security; MR-10: Changes to Community Character; and MR-18: Homelessness.

106-3 The commenter's opposition to the project is noted. All comments have been shared with the Metro Board for their consideration. The Draft EIR acknowledges that light rail projects may result in localized changes to the surrounding environment and analyzes these impacts throughout the Draft EIR, including within Section 3.3, Aesthetics, 3.4, Air Quality, and 3.6, Noise and Vibration. See MR-9: Light Rail Security.

Submission 107 Tara

107-1 Submission 106 includes the same comments from the same commenter. See the response to Submission 106.

Submission 108 Aaron McCain

108-1 The commenter's support for the Metro ROW alignment and the Trench Option is noted. As described in Section 3.6, Noise and Vibration, of the Draft EIR, noise impacts for both the at-grade Elevated/At-Grade Alignment and Trench Option would be similar after mitigation, although not identical. For the Elevated/At-Grade Alignment, which includes at-grade light rail crossings at 170th and 182nd streets, soundwalls would be installed to block the line-of-sight between the train and receptors, reducing noise levels. See Mitigation Measure MM-NOI-2: Soundwalls. However, as noted on page the 3.6-50 of the Draft EIR, the Elevated/At-Grade Alignment would still result in a significant and unavoidable noise impact at two receptor clusters near the at-grade crossing at 170th Street, as the noise levels would exceed Federal Transit Administration noise impact criteria, even with mitigation. In contrast, the Trench Option would locate the train below grade for the majority of its alignment, which would reduce noise impacts to less than significant with mitigation.

The LPA significantly reduces noise impacts compared to the Elevated/At-Grade Alignment because it eliminates the at-grade crossings at 170th and 182nd Streets. By grade separating the light rail from all roadways, the LPA removes the need for audible warning

at light rail crossings, such as routine train horns and crossing bells. As described in Chapter 4, Evaluation of Alternatives, of the Draft EIR and Chapter 2, Description of the Locally Preferred Alternative, of the Final EIR, the operational noise impacts of the LPA would be comparable to those of the Trench Option and would be less than significant with mitigation.

108-2 The commenter's support for the Metro ROW alignments and opposition to the Hawthorne Option is noted. All comments have been shared with the Metro Board for their consideration.

108-3 As described in Chapter 2, Description of the Locally Preferred Alternative, of the Final EIR, the Metro ROW alignments include multi-use recreational paths between 159th Street and 170th Street, between Grant Avenue and 182nd Street and between the Torrance Transit Center and Crenshaw Boulevard. Per Metro's Tree Policy, Metro would preserve existing trees, where possible, and plant new trees and landscaping.

Submission 109 Hank Ramey

109-1 The current Metro Board adopted a new operating pattern, which would provide a direct connection from Expo/Crenshaw to Torrance and Norwalk to LAX. Norwalk would be accessible from Expo/Crenshaw via transfer in the LAX area.

Submission 110 Alexandros Martinez

110-1 The current Metro Board adopted a new operating pattern, which would provide a direct connection from Expo/Crenshaw to Torrance and Norwalk to LAX. A connection between Redondo Beach and Norwalk could be made with a transfer in the LAX area.

110-2 The commenter's support for the Metro ROW alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 111 Jan Kurth

111-1 Noise monitoring at locations 17, 18, and 23 were conducted in the City of Redondo Beach, as shown in Figure 3.6-7 in the Draft EIR. Noise monitoring location 23 is specifically located on the west side of the Metro ROW. These measurements were conducted in accordance with the Federal Transit Administration Transit (FTA) Noise and Vibration Impact Assessment Manual (2018), which permits the use of representative measurement to establish existing noise levels for areas with similar noise conditions. See MR-2: Operational Noise Analysis Methodology and Impact Thresholds.

Sensitive receptors in Redondo Beach, including residential areas near the Metro ROW, are fully analyzed in the Draft EIR as Clusters E1 through E8 F1 through F19 and G1 through G15. Noise impacts in these areas would be less than significant or less than significant with mitigation, as shown in Figure 3.6-22 and Figure 3.6-23 of the Draft EIR.

Regarding the existing freight train noise, including horn noise at at-grade crossings, the project design includes quiet-zone ready crossings. This allows freight horn noise to be

eliminated via the designation of a Federal Rail Administration (FRA) quiet zone. Project Feature PF-NV-1: Quiet Zone Equipment Installation includes the installation of this quiet-zone ready equipment, and Mitigation Measure MM-NOI-4: Quiet Zone Establishment commits Metro to working with the cities to facilitate the FRA quiet zone application. Pursuant to federal regulations (49 CFR 222), if all necessary safety features are installed, the quiet zone could qualify for automatic approval. See MR-3: Operational Noise Project Features and Mitigation Measures.

With regard to concerns about structural stability near Fisk Court and the project's proximity to residential properties, the relocated freight track would be properly supported along the south side of the Metro ROW, using either a retaining wall or sloped fill consistent with existing conditions. As described in Section 3.8, Geology, Soils, and Paleontological Resources, of the Draft EIR, pursuant to Project Feature PF-GEO-1: Metro Geotechnical Design Standards, engineering designs, including retaining walls and track support structures, would comply with Metro's safety and engineering standards, and final design would address stability and safety considerations. The potential for LPA impacts is addressed in Chapter 4, Evaluation of Alternatives, of the Draft EIR. See MR-13: Soil Stability and Sinkholes and MR-20: Proximity Impacts of Relocated Freight Tracks.

111-2 Section 3.9-4.1 of the Draft EIR evaluates the potential for the project to create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials. See the analysis therein, as well as MR-8: Light Rail and Freight Train Safety for additional information.

Submission 112 Mark Nelson

112-1 While Metro acknowledges Beach Cities Health District (BCHD) aim to promote community health, Metro cannot comment on BCHD's decisions or actions, as it is an independent entity. Therefore, questions regarding BCHD's decisions and priorities would best be directed to BCHD.

See MR-4: Potential Negative Health Effects Related to Noise, Vibration, and Air Quality.

112-2 The referenced study considers the potential for railway noise, particularly freight trains, to contribute to health effects through increased oxidative stress and cardiovascular risk. The project under consideration is a light rail transit line to be operated by Metro, not a heavy rail line operated by Metrolink or freight rail. Light rail vehicles are quieter, electrically powered trains that generate less noise compared to larger, diesel operated Metrolink trains and freight operators. See MR-4: Potential Negative Health Effects Related to Noise, Vibration, and Ai Quality.

Section 3.6, Noise and Vibration, of the Draft EIR, evaluates noise impacts from the project in accordance with the Federal Transit Administration Noise and Vibration Impact Assessment Manual (2018). Mitigation Measures MM-NOI-2: Soundwalls and MM-NOI-3: Low Impact Frogs would ensure operational noise and vibration levels remain within acceptable levels for residential areas to the maximum extent feasible.

The LPA significantly reduces noise impacts compared to the Elevated/At-Grade Alignment because it eliminates the at-grade crossings at 170th and 182nd Streets. By grade

separating the light rail from all roadways, the LPA removes the need for audible warning at light rail crossings, such as routine train horns and crossing bells, similar to the Hawthorne Option and Trench Option. As described in Chapter 4, Evaluation of Alternatives, of the Draft EIR and Chapter 2, Description of the Locally Preferred Alternative, of the Final EIR, operational noise impacts of the LPA would be less than significant with mitigation at all locations, including residential areas.

Submission 113 Angie Souza

113-1 Metro recognizes the importance of fostering community connections and social engagement, particularly for senior residents. The design of the project aims to minimize disruption to the surrounding neighborhoods during construction and operation. As described in Section 3.6, Noise and Vibration, of the Draft EIR, the project would implement Mitigation Measures MM-NOI-2: Soundwalls and MM-NOI-3: Low Impact Frogs, which would reduce operational noise to less than significant levels with mitigation for most sensitive receptors along the Metro ROW. See MR-3: Operational Noise Project Features and Mitigation Measures.

The LPA significantly reduces noise impacts compared to the Elevated/At-Grade Alignment because it eliminates the at-grade crossings at 170th and 182nd Streets. By grade separating the light rail from all roadways, the LPA removes the need for audible warning at light rail crossings, such as routine train horns and crossing bells. As described in Chapter 4, Evaluation of Alternatives, of the Draft EIR, and Chapter 2, Description of the Locally Preferred Alternative, of the Final EIR, with mitigation, the operational noise impacts of the LPA would be reduced to less than significant with mitigation at all sensitive receptors, including within residential areas.

The project is intended to enhance mobility and access, including for seniors. With convenient connections to nearby transit hubs and services, the light rail extension may improve access to local destinations, providing new opportunities for social interaction and community engagement.

See MR-4: Potential Negative Health Effects Related to Noise, Vibration, and Air Quality and MR-10: Changes to Community Character.

113-2 Metro understands concerns regarding property values. However, under CEQA, economic impacts such as changes in property values are not considered environmental impacts. The Draft EIR focuses on physical environmental impacts and measures to mitigate them, as required by CEQA. To address questions and concerns on property values, Metro has prepared more information. See MR-14: Property Values and Impacts to Businesses.

Submission 114 Jane Alfonso

114-1 The commenter’s support for the Hawthorne Option is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 115 William Daniel Mack

115-1 The commenter's support for the project is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives. Metro puts the highest priority on public safety and security. See MR-8 Light Rail and Freight Train Safety and MR-9: Light Rail Security.

Submission 116 Rosario

116-1 The Draft EIR analyzes the potential impacts of the project. A summary of potential impacts is included in Chapter ES, Executive Summary, of the Draft EIR. See MR-4: Potential Negative Health Effects Related to Noise, Vibration, and Air Quality.

Submission 117 Cheryl Williamson

117-1 The project is not within the City of Inglewood. Construction would not commence until the project is approved and funded by the Metro Board.

Submission 118 can be found in Section 5.4 Responses to Groups and Organizations

Submission 119 can be found in Section 5.4 Responses to Groups and Organizations

Submission 120 can be found in Section 5.4 Responses to Groups and Organizations

Submission 121 can be found in Section 5.3 Responses to Public Agencies

Submission 122 Kevin Mitchell

122-1 The comment suggests an alternative alignment for the Hawthorne Option. The only feasible way for the alignment to transition back to the Metro ROW is through the Volvo property. The route suggested by the commenter would not be feasible as the required track geometry would not allow for the turning radius and curvature required for safe and efficient light rail operations. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

122-2 See response to Comment 122-1.

122-3 See response to Comment 122-1.

122-4 See response to Comment 122-1.

122-5 See response to Comment 122-1.

122-6 See response to Comment 122-1.

Submission 123 can be found in Section 5.3 Responses to Public Agencies

Submission 124 Jan and Thomas Kurth

124-1 The property referenced in the comment was included in the vibration analysis conducted for the Draft EIR; however, it was inadvertently not clearly described in the vibration analysis in Appendix 3.6-C, due to the aerial imagery used in the analysis, which included a wide tree canopy that obscured the building. To clarify this, Figures 3.6-C17 and, 3.6-C18, and 3.6-C19 and tables 3.6-24 and 3.6-25 have been updated, as shown in Chapter 3, Correction and Revisions, of the Final EIR. These clarifications do not change the conclusions of the Draft EIR, which concluded there would be significant and unavoidable vibration annoyance impacts during construction and that implementation of Mitigation Measures MM-VIB-3: Pre- and Post-Construction Surveys through MM-VIB-6: Ballast Mats would reduce operation vibration annoyance impacts to less than significant with mitigation.

Regarding the property lines depicted in the Draft EIR figures, the mapping was based on Metro's most current ROW information at the time of preparation. This information was sufficient to inform the Draft EIR's evaluation of environmental impacts. In Spring 2025, Metro conducted a survey of property boundaries, which is reflected in the Final EIR Appendix B, Select Advanced Conceptual Engineering Drawings - Locally Preferred Alternative. If a Metro ROW alignment is approved for implementation, Metro would continue to coordinate with property owners as design progresses.

124-2 See MR-8: Light Rail and Freight Train Safety and MR-20: Proximity Impacts of Relocated Freight Tracks.

124-3 The noted residence is included in the noise analysis as part of Cluster G7, as shown on page 3.6-53 and page 3.6-67 of the Draft EIR. To mitigate noise impacts, the project would install soundwalls along both sides of the Metro ROW, as required by Mitigation Measure MM-NOI-2: Soundwalls. Additionally, Mitigation Measure MM-NOI-3: Low Impact Frogs, requires the installation of low-impact frogs to minimize noise associated with light rail crossovers near the noted residence. Low-impact frogs work by using specialized rail components to reduce the noise and vibration caused by train wheels crossing over switches and other track components. This technology dampens the impact noise that typically occurs at crossovers. With these measures in place, noise impacts to the noted residence would be reduced to less than significant with mitigation, meaning noise levels would not exceed the Federal Transit Administration noise criteria for residential land uses. See MR-2: Operational Noise Analysis Methodology and Impact Thresholds and response to Comment 124-1.

Submission 125 Jan and Thomas Kurth

125-1 Submission 124 includes the same comments from the same commenter. See the response to Submission 124.

Submission 126 can be found in Section 5.3 Responses to Public Agencies

Submission 127 can be found in Section 5.3 Responses to Public Agencies

Submission 128 Isabel (Douvan) Shwartz

128-1 The commenter's support for the Metro ROW alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

128-2 See MR-17: Response to Torrance Community Letter.

128-3 See MR-17: Response to Torrance Community Letter.

128-4 See MR-17: Response to Torrance Community Letter.

Submission 129 can be found in Section 5.4 Responses to Groups and Organizations

Submission 130 can be found in Section 5.3 Responses to Public Agencies

Submission 131 John Schreiber

131-1 The commenter's support for the Hawthorne Option is noted. See MR-1: Selection of Alternatives.

131-2 The potential for aesthetics impacts for the Elevated/At-Grade Alignment and the Trench Option are addressed in Section 3.3, Aesthetics, of the Draft EIR. The potential for aesthetics impacts for the LPA are addressed in Chapter 4, Evaluation of Alternatives, of the Draft EIR. None of the alignment options or alternatives would result in temporary or permanent significant aesthetic impacts.

131-3 Section 3.3, Aesthetics, of the Draft EIR evaluates baseline conditions of the existing Metro ROW as an active railroad corridor. This includes not only the current freight train operations, but also the visual characteristics inherent to a railroad corridor, such as railroad tracks and associated infrastructure. The implementation of the project would not fundamentally change the use of the Metro ROW as a transportation corridor. The potential for LPA impacts is addressed in Chapter 4, Evaluation of Alternatives, of the Draft EIR. See MR-10: Changes to Community Character.

The Draft EIR provides sufficient information to assess potential impacts related to landscaping. Project Feature PF-AES-2: Metro Design Standards further commits the project to implementing Metro's design policies, which ensure high-quality landscaping and visual appeal. Section 3.3-4.3.2 of the Draft EIR provides details concerning landscaping, as relevant, in the text and corresponding visual simulations. The project's unified design elements and landscaping would contribute positive visual enhancements, such as unform landscaping landscaped public spaces. In addition, as relevant to the City of Lawndale, the 2023 Urban Design Report, published concurrently with the Draft EIR, provides that the project design would focus on preserving the open space character

along Condon Avenue by retaining mature trees, where feasible, and introducing additional shade trees to enhance the corridor's visual character. CEQA does not mandate a detailed landscape and maintenance plan at the EIR stage, and such details would be determined during final design.

See response to Comment 41-2, which explains the thresholds of significance used in Section 3.3 of the Draft EIR to assess aesthetics impacts. While the Draft EIR concludes that the change to visual quality is neutral due to the existing visual character of the Metro ROW and the anticipated appearance of the light rail system, Metro acknowledges that individual experiences of aesthetics may differ. However, through the implementation of Metro design policies to ensure a high quality in design, the project would be consistent with local policies regarding visual character and quality and would not result in a significant impact.

131-3 As noted on page 3.3-71 and several other locations within the Draft EIR's aesthetics analysis, Metro's Tree Policy requires a minimum tree replacement ratio of 2:1 (or 4:1 if the tree is considered a heritage tree). While it is true that young trees take time to reach the height of mature trees, Metro's policy prioritizes planting strategies that maximize the use of drought tolerant and native species, thereby enhancing the local ecosystem. Trees would also be replanted along the corridor to preserve and enhance the aesthetic character of the community.

131-4 Metro's Project Team has conducted many field reviews of the Metro ROW and surrounding community. The commenter's support for the Hawthorne Option is noted. All comments have been shared with the Metro Board for their consideration.

Submission 132 can be found in Section 5.3 Responses to Public Agencies

Submission 133 Lillian Katzenmeyer

133-1 Potential noise and vibration impacts are addressed in Section 3.6, Noise and Vibration, of the Draft EIR. The potential for LPA impacts is addressed in Chapter 4, Evaluation of Alternatives, of the Draft EIR. Light rail vehicles are significantly quieter than freight trains and result in far less vibration due to the weight of the vehicles. Light rail lines operate throughout Los Angeles County in close proximity to schools, parks, and residences. The presence of the light rail system does not inhibit outdoor enjoyment or activities. See MR-4: Potential Negative Health Effects Related to Noise, Vibration, and Air Quality and MR-10: Changes to Community Character.

133-2 See MR-8: Light Rail and Freight Train Safety.

133-3 The project under consideration is a light rail transit line to be operated by Metro, not a heavy rail line operated by Metrolink or freight rail. Light rail vehicles are quieter, electrically powered trains that generate less noise compared to larger, diesel operated Metrolink trains and freight operators. Mitigation Measure MM-VIB-3: Pre- and Post-Construction Surveys require contractors to document damage resulting from vibration impacts during construction and repair them. In addition, as discussed in Section 3.8, Geology and Soils, of the Draft EIR, the project design process would include thorough site

geotechnical investigations to ensure the stability of nearby structures. Per Project Feature PF-GEO-1: Metro Geotechnical Design Standards, site-specific geotechnical investigations would be conducted to address foundation and structural safety. The investigation would include engineering and construction recommendations to ensure surrounding structures are not damaged.

Metro is committed to integrating safety into all Metro rail operations. See MR-9: Light Rail Security and response to Comment 133-2.

133-4 See response to Comment 133-3. Metro acknowledges the vibration demonstrated in the linked video created by existing freight train vibration. As described in Section 3.6, Noise and Vibration, of the Draft EIR, the analysis of operational vibration impacts followed the Federal Transit Administration (FTA) Transit Noise and Vibration Impact Assessment Manual (FTA, 2018). The vibration levels from light rail operations would be significantly lower than those generated by freight trains, due to the lighter weight. Operational vibration levels from the project would not exceed FTA thresholds.

133-5 Chapter 2, Description of the Locally Preferred Alternative, of the Final EIR describes the anticipated construction durations.

While the total duration of construction could be up to six years, construction would occur in phases and activities would be distributed throughout the entire project area. This means construction would not occur continuously in any one location.

As described in Section 3.6, Noise and Vibration, of the Draft EIR, Mitigation Measure MM-NOI-1: Noise Control Plan would be implemented to control noise during construction. The Noise Control Plan would include noise reducing measures, such as noise-reducing equipment and implementing temporary barriers. The Noise Control Plan would also include noise monitoring to ensure compliance with the Federal Transit Administration's construction noise limits.

133-6 As described in Section 3.6, Noise and Vibration, of the Draft EIR, Federal Transit Administration has defined vibration thresholds for human annoyance and structural damage. As shown in Table 3.6-6, the threshold for vibration annoyance is 65 vibration decibels for "frequent events." The threshold for construction vibration damage is shown in Table 3.6-5, which expresses vibration in terms of peak particle velocity inches per second. The analysis in the Draft EIR evaluates construction vibration impacts based on these established thresholds. For operational vibration impacts, vibration impacts are assessed in terms of human annoyance, as building damage thresholds are much greater than annoyance thresholds and are typically limited to construction activities which generate higher peak vibration levels than freight or light rail trains.

The commenter's interpretation of the vibration data is inaccurate. Vibration levels were elevated at the El Nido Park measurement location for both northbound and southbound trains, indicating that the observed levels were not solely attributable to variations in train weight. For both loaded and unloaded trains, the highest vibration levels typically occurred with the passage of the locomotive, which is generally the heaviest part of the train.

As described on page 3.6-28 of the Draft EIR, the FTA general assessment methodology does not require vibration measurements. Vibration measurements were primarily conducted to collect samples of vibration generated by the existing freight train pass-bys and not as a requirement to prepare the analysis. As described on page 3.6-31, where higher vibration propagation was predicted compared to the predicted vibration levels, adjustments were made to calibrate the model such that it reflected higher vibration levels in the vicinity of El Nido Park.

See response to Comment 133-3 regarding vibration mitigation and vibration effects related to annoyance and damage during operations.

The commenter's support for the Hawthorne Option is noted. All comments have been shared with the Metro Board for their consideration.

Submission 134 Angelica Vicente

134-1 Metro has designed the project to avoid displacement of residents. See the 2023 Real Estate Acquisition Report, published concurrently with the Draft EIR, and the 2025 Real Estate Acquisition Report, published concurrently with this Final EIR for more detailed information on proposed property acquisitions. The Metro ROW is wide enough to accommodate both the relocated freight and the proposed light rail. Figure 2.3-4 of the Draft EIR shows an example of where the freight track would be relocated to the west within the existing Metro ROW, along with space for a multi-use recreational path up to 20 feet wide. wide.

Figure 2.3-5 in the Draft EIR accurately represents various locations between 170th Street and Artesia Boulevard, where the Metro ROW narrows to about 75 feet. Even in the narrower section, Metro has designed the project to avoid displacement of residents. In Spring 2025, Metro conducted a survey of property boundaries. That information is reflected in the Final EIR Appendix B, Select Advanced Conceptual Engineering Drawings - Locally Preferred Alternative.

It should be noted that economic impacts are outside CEQA's purview, which focuses on impacts to the physical environment. However, Metro is committed to serving low-income and black, indigenous, and people of color communities, who make up the majority of Metro's rail ridership. The project aims to provide improved transit access for these communities. See MR-19: Project Benefits.

134-2 The commenter's support for the Hawthorne Option is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 135 Angelica Vicente

135-1 As described in Section 3.6, Noise and Vibration, of the Draft EIR, the only location where a significant and unavoidable vibration impact related to structural damage would occur is at Grant Avenue, where the Elevated/At-Grade Alignment would relocate the freight bridge, requiring the use of high-vibration equipment such as an impact pile driver. Mitigation Measure MM-VIB-3: Pre- and Post- Construction Surveys would require contractors to document any damage resulting from construction vibration and repair it.

For the rest of the corridor, the potential for building damage under the Elevated/At-Grade Alignment would be significantly reduced because the types of construction equipment would generate lower vibration levels. Unlike the Elevated/At-Grade Alignment, the LPA, Trench Option, and Hawthorne Option, would not require reconstruction of the Grant Avenue Bridge and their vibration-related damage impacts would be less than significant with mitigation. Vibration annoyance during construction would remain significant and unavoidable for all options.

135-2 The project under consideration is a light rail transit line to be operated by Metro, not a heavy rail line operated by Metrolink or freight rail. Light rail vehicles are quieter, electrically powered trains that generate less noise compared to larger, diesel operated Metrolink trains and freight operators. Mitigation Measure MM-VIB-3: Pre- and Post-Construction Surveys require contractors to document damage resulting from vibration impacts during construction and repair them. In addition, as discussed in Section 3.8, Geology and Soils, of the Draft EIR, the project design process would include thorough site geotechnical investigations to ensure the stability of nearby structures. Per Project Feature PF-GEO-1: Metro Geotechnical Design Standards, site-specific geotechnical investigations would be conducted to address foundation and structural safety. The investigation would include engineering and construction recommendations to ensure surrounding structures are not damaged.

The presence of natural gas lines and petroleum pipelines, their potential impacts, and applicable regulatory requirements are addressed in Sections 3.9, Hazards and Hazardous Materials, and 3.11 Utilities and Service System, of the Draft EIR. Potential impacts of the LPA in this context are evaluated in Chapter 4, Evaluation of Alternatives, of the Draft EIR. In addition, Section 4.13, Corrections and Additions, of the Final EIR expands on the analysis in Section 3.9-4.2.1 of the Draft EIR by clarifying the protocols, construction techniques, regulations, and standards with which the project would comply. As detailed therein, these clarifications do not change the Draft EIR's conclusion that impacts related to oil and gas pipelines would be less than significant. See MR-7: Utility Relocation and Hazardous Materials Safety, MR-8: Light Rail and Freight Train Safety; and MR-13: Soil Stability and Sinkholes.

135-3 The impact counts provided in Table 3.6-24 of the Draft EIR are correct. As shown in Appendix 3.6-C of the Draft EIR, 23 residences west of the Metro ROW between 170th and Artesia were identified as experiencing operational vibration annoyance impacts. The commenter notes that there are 28 houses in this area; however, not all of these homes are directly adjacent to the Metro ROW or within the impact contour for ground-borne vibration.

Metro has designed the project to avoid displacement of residents. See the 2023 Real Estate Acquisition Report, published concurrently with the Draft EIR, and the 2025 Real Estate Acquisition Report, published concurrently with this Final EIR for more detailed information on proposed property acquisitions. for more detailed information on proposed property acquisitions.

Submission 136 Angelica Vicente

136-1 The commenter's opposition to the Metro ROW alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives and MR-8: Light Rail and Freight Train Safety.

136-2 The presence of natural gas lines and petroleum pipelines, their potential impacts, and applicable regulatory requirements are addressed in Sections 3.9, Hazards and Hazardous Materials, and 3.11 Utilities and Service System, of the Draft EIR. Potential impacts of the LPA in this context are evaluated in Chapter 4, Evaluation of Alternatives, of the Draft EIR. In addition, Section 4.13, Corrections and Additions, of the Final EIR expands on the analysis in Section 3.9-4.2.1 of the Draft EIR by clarifying the protocols, construction techniques, regulations, and standards with which the project would comply. As detailed therein, these clarifications do not change the Draft EIR's conclusion that impacts related to oil and gas pipelines would be less than significant. See MR-7: Utility Relocation and Hazardous Materials Safety and MR-13: Soil Stability and Sinkholes for additional information.

136-3 See response to Comments 136-1 and 136-2, as well as MR-7: Utility Relocation and Hazardous Materials Safety.

136-4 The project would not expose any pipelines or other underground utilities, except briefly during early construction to relocate or protect in place. Such work would occur in advance of rail construction. See response to Comments 136-1 and 136-2, as well as MR-7: Utility Relocation and Hazardous Materials Safety.

136-5 The light rail's adjacency to BNSF freight trains would not affect the Metro light rail train operating speed, as the light rail and BNSF freight trains would operate on separate tracks.

136-6 The commenter's photos of petroleum warning signs are noted. All comments have been shared with the Metro Board for their consideration. These pipelines are included in the Advanced Conceptual Engineering that informs analysis in Section 3.9, Hazards and Hazardous Materials. See response to Comment 136-2 and MR-7: Utility Relocation and Hazardous Materials Safety.

Submission 137 Joan Marks

137-1 The commenter's support for the Metro ROW alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

137-2 See MR-17: Response to Torrance Community Letter.

137-3 See response to Comment 137-2.

137-4 See response to Comment 137-2.

Submission 138 can be found in Section 5.3 Responses to Public Agencies

Submission 139 can be found in Section 5.4 Responses to Groups and Organizations

Submission 140 Jan Kurth

140-1 This comment is duplicative of Comment 111-1. See response to Comment 111-1.

140-2 The commenter's opposition to using the Metro ROW and support for the Hawthorne Option is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

140-3 See MR-4: Potential Negative Health Effects Related to Noise, Vibration, and Air Quality and MR-10: Changes to Community Character.

140-4 See MR-8: Light Rail and Freight Train Safety and MR-20: Proximity Impacts of Relocated Freight Tracks. As indicated in the article cited by the commenter, Metro appropriately suspended rail service in the area in response to the freight rail incident and provided bus bridges to ensure continued passenger service between affected stations.

140-5 The commenter's opposition to the Metro ROW alignment and support for the Hawthorne Option or No Build Alternative is noted. All comments have been shared with the Metro Board for their consideration.

Submission 141 Lisa Francois

141-1 See MR-16: Response to Lawndale and Redondo Beach Community Letter.

141-2 See MR-16: Response to Lawndale and Redondo Beach Community Letter.

141-3 See MR-16: Response to Lawndale and Redondo Beach Community Letter.

141-4 See MR-16: Response to Lawndale and Redondo Beach Community Letter.

141-5 See MR-16: Response to Lawndale and Redondo Beach Community Letter.

141-6 See MR-16: Response to Lawndale and Redondo Beach Community Letter.

141-7 See MR-16: Response to Lawndale and Redondo Beach Community Letter.

Submission 142 Luis Marroquin

142-1 See MR-16: Response to Lawndale and Redondo Beach Community Letter.

142-2 See MR-16: Response to Lawndale and Redondo Beach Community Letter.

142-3 See MR-16: Response to Lawndale and Redondo Beach Community Letter.

142-4 See MR-16: Response to Lawndale and Redondo Beach Community Letter.

142-5 See MR-16: Response to Lawndale and Redondo Beach Community Letter.

142-6 See MR-16: Response to Lawndale and Redondo Beach Community Letter.

142-7 See MR-16: Response to Lawndale and Redondo Beach Community Letter.

Submission 143 Michael Kim

143-1 See MR-8: Light Rail and Freight Train Safety.

143-2 The commenter's support for the Hawthorne Option or High-Frequency Bus Alternative is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 144 Monique Negrete-Mitchell

144-1 The project incorporates commitments to ensure that dust and particulate matter emissions during construction are controlled. With respect to fugitive dust control, Project Feature PF-AQ-2: South Coast Air Quality Management District (SCAQMD) Rule 403 Compliance includes a suite of best management practices, such as regularly applying water to active construction areas to suppress dust, limiting vehicle speeds on unpaved surfaces to 15 mph, covering haul trucks to prevent dust from escaping during transport, and sweeping streets to prevent dust accumulation.

Regarding emissions from construction equipment, Project Feature PF-AQ-1: Metro Green Construction Policy Compliance would require that all off-road construction equipment utilize engines that meet or exceed Tier 4 emissions standards, significantly reducing particulate emissions compared to older equipment. While construction activity would be temporary, Metro recognizes the potential burden on nearby residents. For this reason, the project incorporates stringent and effective dust and emissions control measures available. The anticipated reduction in fugitive dust emissions from these practices is substantial, ranging from 36% to 91% depending on the activity, as described in Section 3.4-4.1.1 of the Draft EIR. The localized emissions analysis included in Section 3.4, Air Quality, of the Draft EIR was conducted in accordance with South Coast Air Quality Management District (SCAQMD) thresholds and evaluated impacts to sensitive receptors (e.g., residences) within 50 feet of construction activities. That analysis determined that localized PM_{10} emissions would remain below the SCAQMD's significance thresholds. The potential for LPA impacts is addressed in Chapter 4, Evaluation of Alternatives, of the Draft EIR.

With respect to cumulative impacts, the Draft EIR concluded that construction of the Elevated/At-Grade Alignment would result in a less-than-significant impact related to a cumulatively considerable net increase in emissions of particulate matter.

See MR-4: Potential Negative Health Effects Related to Noise, Vibration, and Air Quality.

144-2 The commenter's support for the Hawthorne Option or High-Frequency Bus Alternative is noted. See MR-1: Selection of Alternatives.

Submission 145 Otto Asencio

145-1 See MR-16: Response to Lawndale and Redondo Beach Community Letter.

145-2 See MR-16: Response to Lawndale and Redondo Beach Community Letter.

145-3 See MR-16: Response to Lawndale and Redondo Beach Community Letter.

145-4 See MR-16: Response to Lawndale and Redondo Beach Community Letter.

145-5 See MR-16: Response to Lawndale and Redondo Beach Community Letter.

145-6 See MR-16: Response to Lawndale and Redondo Beach Community Letter.

145-7 See MR-16: Response to Lawndale and Redondo Beach Community Letter.

Submission 146 Ray Hollar

146-1 Metro prepared cost estimates in 2022 for all rail alignments and shared them with the Metro Board at the May 2024 Board meeting. The cost estimate for the LPA at the time was $2.23B. Metro is continuing to refine the cost estimate as design progresses, and will provide an update to the Metro Board prior to a final determination on the project; see MR-21: Cost Estimates and Schedule.

146-2 See response to Comment 146-1.

146-3 See response to Comment 146-1.

Submission 147 Tatiana Gomez

147-1 See MR-16: Response to Lawndale and Redondo Beach Community Letter.

147-2 See MR-16: Response to Lawndale and Redondo Beach Community Letter.

147-3 See MR-16: Response to Lawndale and Redondo Beach Community Letter.

147-4 See MR-16: Response to Lawndale and Redondo Beach Community Letter.

147-5 See MR-16: Response to Lawndale and Redondo Beach Community Letter.

147-6 See MR-16: Response to Lawndale and Redondo Beach Community Letter.

147-7 See MR-16: Response to Lawndale and Redondo Beach Community Letter.

Submission 148 Sam and Eloise Elder

148-1 This commenter's support for the Hawthorne Option and High-Frequency Bus Alternative is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

148-2 The LAX/Metro Transit Center Station is expected to open in early 2025 and would connect to the K and C Lines directly, which would provide a connection to LAX.

148-3 The commenter's opposition to the project is noted. All comments have been shared with the Metro Board for their consideration.

Submission 149 Traci Fuentes

149-1 The commenter's opposition to the project is noted. All comments have been shared with the Metro Board for their consideration. The project under consideration is a light rail transit line to be operated by Metro, not a heavy rail line operated by Metrolink or freight rail. Light rail vehicles are quieter, electrically powered trains that generate less noise compared to larger, diesel operated Metrolink trains and freight operators. Section 3.6, Noise and Vibration, of the Draft EIR, includes a detailed and project-specific analysis of noise and vibration impacts and their potential effects on sensitive receptors, such as residences, consistent with CEQA and the Federal Transit Administration Noise and Vibration Impact Assessment Manual (2018). The proposed mitigation measures in the Draft EIR would mitigate potential noise impacts along the Metro ROW. In addition, the project would enable the local jurisdictions along the Metro ROW to obtain a "quiet zone" designation, which would reduce existing freight noise overall along the corridor, by eliminating freight horn soundings, which as noted previously, produces noise levels of up to 110 dBA (a-weight decibel). The potential for LPA impacts is addressed in Chapter 4, Evaluation of Alternatives, of the Draft EIR. See MR-3: Operational Noise Project Features and Mitigation Measures.

Submission 150 Angelica Vicente

150-1 The commenter incorrectly notes that the Trench Option's operational noise impact would be significant. Table ES-2 in the Executive Summary of the Draft EIR shows that the Trench Option's operational noise impact would be less than significant with mitigation.

150-2 Yes. Metro is committed to proactive communication with communities affected by construction. As part of the project's construction management, Metro would conduct outreach to notify residents and businesses of upcoming construction activities. This outreach would include advance notice of construction schedules, duration, and potential disruptions through mailers, signage, community meetings and online updates.

150-3 Soundwalls have been successfully implemented for various Metro projects and have been demonstrated to reduce noise compared to locations with no soundwalls. An example of soundwalls that have been implemented on an active Metro light rail transit line is the Metro E Line between Military Avenue and Westwood Boulevard in the City of Los Angeles. The decibel (dB) reduction is highly dependent on the locations of the source, receptor, and wall. As noted on page 3.6-100 of the Draft EIR, "soundwalls, which according to the Federal Transit Administration Transit Noise and Vibration Impact Assessment Manual (2018), provide up to 12-dB of reduction for non-absorptive barriers and 15 dB for absorptive barriers".

Regarding earthquake safety, as described in Section 3.8, Geology, Soils and Paleontological Resources, of the Draft EIR, in accordance with Project Feature PF-GEO-1: Metro Geotechnical Design Standards, all elements of the project, including soundwalls, would be designed and constructed in accordance with Metro's geotechnical and seismic design criteria to ensure they are seismically resistant, stable, and could withstand liquefaction and its effects. The potential for LPA impacts is addressed in Chapter 4, Evaluation of Alternatives, of the Draft EIR.

150-4 The commenter's support for the Hawthorne Option is noted. The potential for noise impacts is assessed in Section 3.6, Noise and Vibration, of the Draft EIR. The Metro ROW alignments include upgrades to existing freight crossings, allowing for the establishment of a Federal Railroad Administration quiet zone. See MR-3: Operational Noise Project Features and Mitigation Measures and MR-1: Selection of Alternatives.

Submission 151 Alejandra Zuniga

151-1 See MR-16: Response to Lawndale and Redondo Beach Community Letter.

151-2 See MR-16: Response to Lawndale and Redondo Beach Community Letter.

151-3 See MR-16: Response to Lawndale and Redondo Beach Community Letter.

151-4 See MR-16: Response to Lawndale and Redondo Beach Community Letter.

151-5 See MR-16: Response to Lawndale and Redondo Beach Community Letter.

151-6 See MR-16: Response to Lawndale and Redondo Beach Community Letter.

151-7 See MR-16: Response to Lawndale and Redondo Beach Community Letter.

Submission 152 Arohi Sharma

152-1 The commenter's support for using the Metro ROW and the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

152-2 See MR-17: Response to Torrance Community Letter.

152-3 See MR-17: Response to Torrance Community Letter.

152-4 See MR-17: Response to Torrance Community Letter.

Submission 153 Colleen Malone-Villegas

153-1 The commenter's opposition to the Metro ROW alignment is noted. See MR-1: Selection of Alternatives.

Although Metro understands that some residents use the freight corridor for recreational activities, this use is not authorized and is not compliant with freight safety standards. The

Metro ROW is not a park, but rather an active freight corridor. To enhance recreational opportunities, the project would include two multi-use recreational paths and new landscaping in areas where space allows, providing safe and accessible amenities for the community. See MR-10: Changes to Community Character. In addition, the LPA would be fully grade-separated from all roadways, thereby avoiding potential conflicts with pedestrians.

As described in Section 3.6, Noise and Vibration, of the Draft EIR, the project would not result in operational vibration that could damage structures. Mitigation Measure MM-VIB-3: Pre- and Post-Construction Surveys requires contractors to document damage resulting from vibration impacts during construction, and repair them. In addition, as discussed in Section 3.8, Geology and Soils, of the Draft EIR, the project design process would include thorough site geotechnical investigations to ensure the stability of nearby structures. Per Project Feature PF-GEO-1: Metro Geotechnical Design Standards, site-specific geotechnical investigations would be conducted to address foundation and structural safety. The investigation would include engineering and construction recommendations to ensure surrounding structures are not damaged.

153-2 Section 3.6, Noise and Vibration, of the Draft EIR, includes a detailed and project-specific analysis of noise impacts and their potential effects on sensitive receptors, such as residences, consistent with CEQA and the Federal Transit Administration Noise and Vibration Impact Assessment Manual (2018). As discussed on page 3.6-48 of the Draft EIR, it is unlikely for light rail noise to result in noise-induced hearing loss, but acknowledges that increased levels in noise could increase stress at affected uses. The proposed mitigation measures, including Mitigation Measures MM-NOI-2: Soundwalls, MM-NOI-3: Low Impact Frogs, and MM-NOI-4: Quiet Zone Establishment would reduce these effects.

See MR-4: Potential Negative Health Effects Related to Noise, Vibration, and Air Quality.

Submission 154 Blake Jung

154-1 As discussed in Section 3.7, Biological Resource, of the Draft EIR, the Resource Study Area for biological resources is not located within any areas designated within Habitat Conservation Plans or Natural Community Conservation Plannings. The potential for LPA impacts is addressed in Chapter 4, Evaluation of Alternatives, of the Draft EIR.

154-2 The commenter's support for the Hawthorne Option is noted. All comments have been shared with the Metro Board for their consideration. The Draft EIR considers and analyzes noise and vibration impacts in Section 3.6. See MR-1: Selection of Alternatives and MR-3: Operational Noise Project Features and Mitigation Measures.

Submission 155 Chelsea Schreiber

155-1 The commenter's opposition to the project alignment along the Metro ROW is noted. All comments have been shared with the Metro Board for their consideration. See MR-8: Light Rail and Freight Train Safety.

155-2 Metro extends its sympathies to the commenter for their loss. Safety along the rail corridor is a top priority. Although Metro does not have specific safety features for pets,

as described in Chapter 2, Project Description, of the Draft EIR, the entire light rail guideway would be enclosed by physical barriers, such as fencing, soundwalls, or a combination of both, to prevent unauthorized access. Although these barriers are primarily intended to restrict human intrusion, they would also serve to deter or prevent land animals from entering the guideway. In many areas, the existing fencing has been breached, and would be repaired under the project, which would limit unauthorized access into the Metro ROW to ensure safety near operating rail. See MR-8: Light Rail and Freight Train Safety. The LPA, Hawthorne Option, and Trench Option light rail guideways would all be fully grade-separated from the roadways.

155-3 See response to Comment 155-2.

155-4 The commenter's support for the Hawthorne Option is noted. All comments have been shared with the Metro Board for their consideration. See response to 155-1. See MR-1: Selection of Alternatives.

Submission 156 Chris Horsman

156-1 See MR-16: Response to Lawndale and Redondo Beach Community Letter.

156-2 See MR-16: Response to Lawndale and Redondo Beach Community Letter.

156-3 See MR-16: Response to Lawndale and Redondo Beach Community Letter.

156-4 See MR-16: Response to Lawndale and Redondo Beach Community Letter.

156-5 See MR-16: Response to Lawndale and Redondo Beach Community Letter.

156-6 See MR-16: Response to Lawndale and Redondo Beach Community Letter.

156-7 See MR-16: Response to Lawndale and Redondo Beach Community Letter.

Submission 157 Clement Alaba

157-1 The commenter's support of the Hawthorne Option is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

The commenter did not identify which business would be affected or its location relative to the project. As part of the project development process, Metro prioritized minimizing acquisitions and effects to residents and businesses. The alignment options would have minimal real estate impacts to businesses, as described in the 2025 Real Estate Acquisitions Report.

Submission 158 Clement Alaba

158-1 The commenter's opposition to the project is noted. The proposed mitigation measures in the Draft EIR would mitigate potential noise impacts along the Metro ROW. In addition, the project would enable the local jurisdictions along the Metro ROW to obtain a "quiet zone" designation, which would reduce existing freight noise overall along the corridor, by

eliminating freight horn soundings, which as noted previously, produces noise levels of up to 110 dBA (a-weighted decibel). See MR-3: Operational Noise Project Features and Mitigation Measures and MR-4 Potential Negative Health Effects Related to Noise, Vibration, and Air Quality.

Submission 159 David Barajas

159-1 See MR-16: Response to Lawndale and Redondo Beach Community Letter.

159-2 See MR-16: Response to Lawndale and Redondo Beach Community Letter.

159-3 See MR-16: Response to Lawndale and Redondo Beach Community Letter.

159-4 See MR-16: Response to Lawndale and Redondo Beach Community Letter.

159-5 See MR-16: Response to Lawndale and Redondo Beach Community Letter.

159-6 See MR-16: Response to Lawndale and Redondo Beach Community Letter.

159-7 See MR-16: Response to Lawndale and Redondo Beach Community Letter.

Submission 160 DeNise

160-1 See MR-16: Response to Lawndale and Redondo Beach Community Letter.

160-2 See MR-16: Response to Lawndale and Redondo Beach Community Letter.

160-3 See MR-16: Response to Lawndale and Redondo Beach Community Letter.

160-3 See MR-16: Response to Lawndale and Redondo Beach Community Letter.

160-5 See MR-16: Response to Lawndale and Redondo Beach Community Letter.

160-6 See MR-16: Response to Lawndale and Redondo Beach Community Letter.

160-7 See MR-16: Response to Lawndale and Redondo Beach Community Letter.

Submission 161 Glenn E. Stanfield

161-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

161-2 The commenter's opposition to the Trench and Hawthorne Option is noted. All comments have been shared with the Metro Board for their consideration.

Submission 162 Gianna Mitchell

162-1 Metro recognizes that individuals with increased auditory sensitivity, such as those with sensory disorders, may be particularly affected by noise, and that there are other

potentially vulnerable populations, including children, seniors, and people with disabilities.

Section 3.6, Noise and Vibration, of the Draft EIR, provides a detailed and project-specific analysis of noise impacts, including their potential effects on sensitive receptors like residences, consistent with CEQA and the Federal Transit Administration (FTA) Noise and Vibration Impact Assessment Manual (2018). Metro acknowledges that increased noise levels could contribute to stress and other health effects, as noted on page 3.6-48 of the Draft EIR.

The Draft EIR also includes several mitigation measures intended to reduce noise impacts during construction and operation of the project, including Mitigation Measure MM-NOI-1: Noise Control Plan to reduce noise levels generated by construction to below the FTA construction noise criteria, Mitigation Measure MM-NOI-2: Soundwalls to minimize operational noise impacts along impacted segments of the Metro ROW, Mitigation Measure MM-NOI-3: Low Impact Frogs to reduce wheel noise and light rail crossovers, and Mitigation Measure MM-NOI-4: Quiet Zone Establishment to establish a "quiet zone" along the Metro ROW from north of Inglewood Avenue to south of 182nd Street, to prevent routine sounding of freight horns. With the establishment of a quiet zone, freight train noise along the Metro ROW would be reduced overall compared to current conditions. The potential for LPA impacts is addressed in Chapter 4, Evaluation of Alternatives, of the Draft EIR. See MR-3: Operational Noise Project Features and Mitigation Measures.

It is not technically feasible to correlate project-specific noise impacts to specific health outcomes, given the complexity of factors contributing to these conditions. However, with implementation of the proposed mitigation measures, noise levels associated with construction and operation of the project would be reduced. See MR-4: Potential Negative Health Effects Related to Noise, Vibration, and Air Quality.

162-2 The commenter's support for the Hawthorne Option is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 163 Janice Tanabe

163-1 The Draft EIR is not required to analyze destination points, but activity centers are discussed in the 2023 Project Need and Purpose Report, published alongside the Draft EIR. Riders at the Redondo Beach Transit Center would also be able to access the South Bay Galleria via a short walk or transit connection, and Metro would continue to assess opportunities for further enhancing connections as the design progresses.

Submission 164 Ana Maria Houck

164-1 Metro has designed the project to avoid displacement of residents. See the 2023 Real Estate Acquisition Report, published concurrently with the Draft EIR and 2025 Real Estate Acquisition Report, published concurrently with this Final EIR, for more detailed information on proposed property acquisitions. Although not anticipated, should any changes that affect private property arise, Metro would notify property owners and

perform additional environmental analysis, as required. See MR-14: Property Values and Impacts to Businesses..

Submission 165 Jimmy Gow

165-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

165-2 See MR-17: Response to Torrance Community Letter.

165-3 See MR-17: Response to Torrance Community Letter.

165-4 See MR-17: Response to Torrance Community Letter.

Submission 166 John Clifford

166-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

166-2 See MR-17: Response to Torrance Community Letter.

166-3 See MR-17: Response to Torrance Community Letter.

166-4 See MR-17: Response to Torrance Community Letter.

Submission 167 Jose Vera

167-1 The commenter's opposition to the Metro ROW alignment and support for the Hawthorne Option is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

167-2 See MR-16: Response to Lawndale and Redondo Beach Community Letter.

167-3 See MR-16: Response to Lawndale and Redondo Beach Community Letter.

Submission 168 Kevin Mitchell

168-1 The significance threshold referenced in the comment— "substantially increase hazards due to a geometric design feature"—is evaluated in Section 3.1, Transportation, of the Draft EIR. This threshold pertains to transportation safety, such as the introduction of sharp curves, dangerous intersections, or conditions that could degrade the safety of pedestrians, bicyclists, or vehicles.

The Draft EIR analyzes potential transportation safety impacts at locations such as the at-grade light rail crossings at 170th Street and 182nd Street (proposed under the "Proposed Project" in the Draft EIR). The analysis considers factors such as visibility, traffic flow, and interactions between pedestrians, vehicles, and trains. The analysis explains that the

Elevated/At-Grade Alignment would include safety improvements at at-grade light rail crossings, such as upgraded crossing gates, advanced warning signals, and physical barriers to separate different modes of travel. Based on these enhancements, the Draft EIR concludes that the Elevated/At-Grade Alignment would not substantially increase transportation hazards related to geometric design features or incompatible uses (see Draft EIR, pages 3.1-51 to 3.1-53.). Thus, the Draft EIR's analyses and conclusions of potential impacts related to substantially increasing hazards due to a geometric design feature are adequate. It should also be noted that the 170th/182nd Grade-Separated Light Rail Transit Alternative has been selected as the LPA. The LPA eliminates at-grade light rail crossings entirely, but provides a trench at the 170th and 182nd Street crossings.

Although the significance threshold mentioned pertains to transportation safety, the comment also raises concerns about freight operations and pipelines within the Metro ROW. These issues are addressed in Section 3.8, Geology and Soils, Section 3.9, Hazards and Hazardous Materials, and Section 3.11, Utilities and Service Systems of the Draft EIR. In addition, Section 4.13, Corrections and Additions, of the Final EIR expands on the analysis in Section 3.9-4.2.1 of the Draft EIR by clarifying protocols, construction techniques, regulations, and standards with which the project would comply. As detailed therein, these clarifications do not change the Draft EIR's conclusion that impacts related to oil and gas pipelines would be less than significant. See MR-7: Utility Relocation and Hazardous Materials Safety and MR-13: Soil Stability and Sinkholes for additional information.

168-2 See response to Comment 168-1, as well as MR-7: Utility Relocation and Hazardous Materials and MR-8: Light Rail and Freight Train Safety. Regarding the concern over changes in a "quiet neighborhood," see MR-10: Changes to Community Character and MR-3: Operational Noise Project Features and Mitigation Measures.

168-3 See MR-12: Emergency Access. The addition of the light rail service to the existing at-grade crossing at 182nd Street would increase the frequency of the railroad crossing gate down time relative to existing conditions but would not permanently close emergency access. The homes and businesses on either side of the 182nd Street railroad crossing are accessible by alternate routes within ½ mile that are grade-separated crossings and not affected by train frequency.

The LPA light rail guideway would be fully grade-separated from all roadways. There would be no change to existing emergency vehicle delays at 182nd Street.

168-4 The commenter's opposition to the Metro ROW alignment and support for the Hawthorne Option is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives; MR-8: Light Rail and Freight Train Safety; and MR-10: Changes to Community Character.

Submission 169 Phillips

169-1 The potential for noise impacts is addressed in Section 3.6, Noise and Vibration, of the Draft EIR. The potential for LPA impacts is addressed in Chapter 4, Evaluation of Alternatives, of the Draft EIR. See MR-10: Changes to Community Character.

Submission 170 Lisa Francois

170-1 See MR-16: Response to Lawndale and Redondo Beach Community Letter.

170-2 See MR-16: Response to Lawndale and Redondo Beach Community Letter.

170-3 See MR-16: Response to Lawndale and Redondo Beach Community Letter.

170-4 See MR-16: Response to Lawndale and Redondo Beach Community Letter.

170-5 See MR-16: Response to Lawndale and Redondo Beach Community Letter.

170-6 See MR-16: Response to Lawndale and Redondo Beach Community Letter.

170-7 See MR-16: Response to Lawndale and Redondo Beach Community Letter.

Submission 171 Carlos Cruz-Aedo

171-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

171-2 Before making a final determination on the project, the Metro Board will review the comments and responses included in the Final EIR and will consider multiple factors, including environmental impacts, benefits and costs. See MR-21: Cost Estimates and Schedule.

Submission 172 Mike Kim

172-1 See MR-8: Light Rail and Freight Train Safety.

172-2 The commenter's opposition to the Metro ROW alignment and Trench Option is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 173 Betty Fisk

173-1 The commenter's opposition to the Metro ROW alignment and support for the Hawthorne Option is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives. Metro understands concerns regarding property values. However, under CEQA, economic impacts such as changes in property values are not considered environmental impacts. The Draft EIR focuses on physical environmental impacts and measures to mitigate them, as required by CEQA. To address questions and concerns on property values, Metro has prepared more information. See MR-14: Property Values and Impacts to Businesses.

Submission 174 Anonymous

174-1 The commenter's support for the Hawthorne Option is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives. This comment does not raise any significant environmental issues requiring a response.

Submission 175 Mark Nelson

175-1 Although Metro is not subject to local zoning ordinances, pursuant to Mitigation Measure MM-NOI-1: Construction Noise Control Plan, Metro would obtain a variance from the applicable local jurisdiction when nighttime work is required. Section 4-24.604 of the City of Redondo Beach Noise Ordinance specifies that the provisions cited by the comment do not apply to any activity that is preempted by state or federal law. State law preempts Metro from compliance with the local zoning ordinance (see Rapid Transit Advocates, Inc. v. Southern California Rapid Transit District (1986) 185 Cal.App.3d 996). Therefore, the standards cited by the comment do not apply.

The Draft EIR acknowledges that the operational noise impact of the light rail alignment along the Metro ROW with at-grade crossings at 170th and 182nd Street would result be significant and unavoidable. However, the LPA operational noise impacts would be reduced to less than significant with mitigation.

See Chapter 2, Description of the Locally Preferred Alternative, of the Final EIR; MR-1: Selection of Alternatives; MR-4: Potential Negative Health Effects Related to Noise, Vibration, and Air Quality; and MR-10: Changes to Community Character.

175-2 See response to Comment 175-1.

175-3 See response to Comment 175-1.

Submission 176 Lena Poland

176-1 The commenter's opposition to the project is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives; MR-9: Light Rail Security; MR-10: Changes to Community Character; and MR-18: Homelessness.

Submission 177 Mike Cook

177-1 The cost estimates presented in the Draft EIR are based on conceptual-level design and reflect reasonable assumptions regarding construction, operations, and maintenance. Impacts related to drainage patterns alterations are addressed in Section 3.10, Hydrology and Water Quality, of the Draft EIR. The project would increase impervious surfaces compared to existing conditions. However, most of the stormwater runoff would be retained within the project footprint, through an integrated low-impact development (LID) drainage system. This system would be designed to accommodate the stormwater quality design in volume, consistent with the MS4 Permit requirements established by the Los Angeles Regional Water Quality Control Board (LARWQCB). This system would minimize the potential for flooding both on-site and off-site, including in sumps. Maintenance of

drainage infrastructure would also comply with applicable regulatory requirements to ensure long-term functionality.

As discussed in Chapter 4, Evaluation of Alternatives, in the Draft EIR, the hydrology and water quality impacts of the LPA would be similar to those of the Trench Option. Impacts would be less than significant because this alternative would also include stormwater retention systems consistent with regional LID requirements.

177-2 The cost estimates presented in the Draft EIR are based on conceptual-level design and reflect reasonable assumptions regarding construction, operations, and maintenance. These estimates include the proposed noise and vibration mitigation measures. Triple-pane windows were not included in the cost estimate as they are not proposed for this project. Operational noise impacts would be mitigated through the use of soundwalls, low-impact frogs, and the establishment of quiet zones.

The mitigated noise level estimates included in Section 3.6, Noise and Vibration, and Appendix 3.6-B, of the Draft EIR, account for the implementation of Mitigation Measures MM-NOI-2: Soundwalls, MM-NOI-3: Low Impact Frogs, and MM-NOI-4: Quiet Zone Establishment (for the Metro ROW alignments). See MR-3: Operational Noise Project Features and Mitigation Measures. The potential for LPA impacts is addressed in Chapter 4, Evaluation of Alternatives, of the Draft EIR.

177-3 In January 2023, concurrent with the Draft EIR, Metro published a C Line (Green) Extension to Torrance Cost Estimates Summary. See MR-21: Cost Estimates and Schedule.

In May 2024, the Metro Board selected the Hybrid Alternative as the LPA. The LPA was not the least costly option; cost estimates presented to the Board included: Elevated/At-Grade Alignment ($1.96 billion), Trench Option ($2.84 billion), Hawthorne Option ($2.96 billion), and the LPA ($2.23 billion), as estimated in 2022. Before making a final determination on the project, the Metro Board will review the Final EIR, including all public comments and responses, and consider a range of factors including environmental impacts, cost, benefits, and community feedback.

177-4 See response to Comment 177-2.

177-5 See response to Comment 177-1.

Submission 178 Ninnette Martinez

178-1 The commenter's opposition to the project in Lawndale is noted. See MR-1: Selection of Alternatives. See MR-4: Potential Negative Health Effects Related to Noise, Vibration, and Air Quality and MR-8: Light Rail and Freight Train Safety. Metro is committed to integrating safety into all Metro rail operations. The project would comply with relevant safety standards, including the California Manual on Uniform Traffic Control Devices, the California Department of Transportation Highway Design Manual, the Americans with Disabilities Act, and Metro's Grade Crossing Safety Policy. The LPA would be fully grade-separated from all roadways, thereby avoiding potential conflicts with children and other pedestrians or cyclists. In addition, the freight crossing at 182nd Street would include new

safety equipment. Although Metro had initially considered a station in the City of Lawndale, at the request of the City, that station was removed from further consideration.

178-2 Noise is addressed in Section 3.6, Noise and Vibration, of the Draft EIR. See MR-3: Operational Noise Project Features and Mitigation Measures. Moreover, the LPA light rail guideway would be fully grade-separated from all roadways, thereby eliminating the need for light rail warning bells at the intersection of 170th Street by grade separating the tracks there. The potential for LPA impacts is addressed in Chapter 4, Evaluation of Alternatives, of the Draft EIR.

Submission 179 Ninnette Martinez

179-1 See MR-8: Light Rail and Freight Train Safety.

Submission 180 Ninnette Martinez

180-1 The commenter's opposition to the project is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 181 Rita Hidalgo

181-1 The commenter's opposition to the project is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 182 Rita Hidalgo

182-1 The commenter's opposition to the project is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives and MR-10: Changes to Community Character.

Submission 183 Rita Hidalgo

183-1 See MR-16: Response to Lawndale and Redondo Beach Community Letter.

183-2 See MR-16: Response to Lawndale and Redondo Beach Community Letter.

183-3 See MR-16: Response to Lawndale and Redondo Beach Community Letter.

183-4 See MR-16: Response to Lawndale and Redondo Beach Community Letter.

183-5 See MR-16: Response to Lawndale and Redondo Beach Community Letter.

183-6 See MR-16: Response to Lawndale and Redondo Beach Community Letter.

183-7 See MR-16: Response to Lawndale and Redondo Beach Community Letter.

Submission 184 Sukrit Verma

184-1 The commenter's opposition to the Metro ROW alignment and support for the Hawthorne Boulevard Option is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

184-2 See response to Comment 184-1.

Submission 185 Tammy Harrison

185-1 The commenter's opposition to the Metro ROW alignment is noted. All comments have been shared with the Metro Board for their consideration. Metro understands concerns regarding property values. However, under CEQA, economic impacts such as changes in property values are not considered environmental impacts. The Draft EIR focuses on physical environmental impacts and measures to mitigate them, as required by CEQA. To address questions and concerns on property values, Metro has prepared more information. See MR-14: Property Values and Impacts to Businesses. Regarding health effects, see MR-4: Potential Negative Health Effects Related to Noise, Vibration, and Air Quality.

185-2 The potential for noise and vibration impacts of the Elevated/At-Grade Alignment, the Trench Option, and the Hawthorne Option are addressed in Section 3.6, Noise and Vibration, of the Draft EIR. The potential for LPA impacts is addressed Chapter 4, Evaluation of Alternatives, of the Draft EIR. See MR-1: Selection of Alternatives; MR-2: Operational Noise Analysis Methodology and Impact Thresholds; MR-3: Operational Noise Project Features and Mitigation Measures; and MR-4: Potential Negative Health Effects Related to Noise, Vibration, and Air Quality; MR-5: Vibration Impact Types and Impact Thresholds; and MR-6: Vibration Analysis During Final Design.

185-3 The commenter's support for the Hawthorne Option is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 186 can be found in Section 5.4 Responses to Groups and Organizations

Submission 187 Alejandro

187-1 See MR-16: Response to Lawndale and Redondo Beach Community Letter.

187-2 See MR-16: Response to Lawndale and Redondo Beach Community Letter.

187-3 See MR-16: Response to Lawndale and Redondo Beach Community Letter.

187-4 See MR-16: Response to Lawndale and Redondo Beach Community Letter.

187-5 See MR-16: Response to Lawndale and Redondo Beach Community Letter.

187-6 See MR-16: Response to Lawndale and Redondo Beach Community Letter.

187-7 See MR-16: Response to Lawndale and Redondo Beach Community Letter.

Submission 188 Anna Maria Vicente

188-1 The commenter's opposition to the Metro ROW alignment and support for the Hawthorne Option is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

188-2 See MR-7: Utility Relocation and Hazardous Materials Safety and MR-8: Light Rail and Freight Train Safety.

188-3 See response to Comment 188-1.

Submission 189 Betty Lam

189-1 As described in Chapter 2, Project Description, of the Draft EIR, all roadway crossings along the Metro ROW would include pedestrian safety infrastructure, such as gates and warning devices for light rail and freight. The LPA would be fully grade-separated from all roadways. Metro would provide safety enhancements for the existing at-grade freight crossing at 170th Street. See MR-8: Light Rail and Freight Train Safety.

189-2 The Metro ROW has sufficient space for the project. Refer to Appendix B, Select Advanced Conceptual Engineering Drawings - Locally Preferred Alternative, of the Final EIR for more details on the alignment near 170th Street.

189-3 Metro understands concerns regarding property values. However, under CEQA, economic impacts such as changes in property values are not considered environmental impacts. The Draft EIR focuses on physical environmental impacts and measures to mitigate them, as required by CEQA. To address questions and concerns on property values, Metro has prepared more information. See MR-14: Property Values and Impacts to Businesses.

189-4 See response to Comment 189-3. Mitigation Measure MM-VIB-3: Pre- and Post-Construction Surveys requires contractors to document damage resulting from vibration impacts during construction, and repair them. In addition, as discussed in Section 3.8, Geology and Soils, of the Draft EIR, the project design process would include thorough site geotechnical investigations to ensure the stability of nearby structures. Per Project Feature PF-GEO-1: Metro Geotechnical Design Standards, site-specific geotechnical investigations would be conducted to address foundation and structural safety. The investigation would include engineering and construction recommendations to ensure surrounding structures are not damaged. Operation of the project would not result in damage to properties; see MR-5: Vibration Impact Types and Impact Thresholds and MR-13: Soil Stability and Sinkholes for more information.

189-5 The comment does not raise any significant environmental issues requiring a response.

189-6 The commenter's opposition to the project is noted. All comments have been shared with the Metro Board for their consideration.

189-7 See response to Comment 189-1.

189-8 See response to Comment 189-6.

189-9 Lawndale High School is approximately 1/4 mile north of the project, on the opposite side of the Interstate 405; the commenter does not clarify how the high school would be affected.

189-10 The commenter's support for the Hawthorne Option is noted. All comments have been shared with the Metro Board for their consideration.

Submission 190 Doris Hofmann

190-1 The commenter's opposition to the project in Lawndale is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

190-2 Metro understands concerns regarding property values. However, under CEQA, economic impacts such as changes in property values are not considered environmental impacts. The Draft EIR focuses on physical environmental impacts and measures to mitigate them, as required by CEQA. To address questions and concerns on property values, Metro has prepared more information. See MR-14: Property Values and Impacts to Businesses.

190-3 Construction and operational noise and vibration levels are addressed in Section 3.6, Noise and Vibration, of the Draft EIR. The potential for LPA impacts is addressed in Chapter 4, Evaluation of Alternatives, of the Draft EIR. See MR-2: Operational Noise Analysis Methodology and Impact Thresholds, MR-3: Operational Noise Project Features and Mitigation Measures, and MR-10: Changes to Community Character.

190-4 See MR-8: Light Rail and Freight Train Safety.

190-5 The project has secured funding from Measure R (2008), Measure M (2016), Transit and Intercity Rail Capital Program (TIRCP) Grant from the California State Transportation Agency Transit and Intercity Rail Capital Program, and 3% match contributions from local jurisdictions. Metro would continue to explore funding opportunities for the project. Metro is committed to the responsible use of public funds and to managing project costs efficiently, while continuing to pursue additional funding sources to support project delivery.

190-6 The commenter's opposition to the project is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 191 Rita Hidalgo

191-1 The commenter's opposition to the project is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 192 Manuel Hidalgo

192-1 The commenter's opposition to the project is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 193 Radka Samuel

193-1 The project would connect to the Redondo Beach Transit Center and the Torrance Transit Center, which are the cities' transit hubs that provide bus service throughout the region. Riders would also be able to access the rest of Los Angeles County on the rail network system.

193-2 The commenter's opposition to the project is noted. Construction and operational noise levels are addressed in Section 3.6, Noise and Vibration, of the Draft EIR. The potential for LPA impacts is addressed in Chapter 4, Evaluation of Alternatives, of the Draft EIR.

The following commenter made their comment in Spanish. Its response is given first in Spanish. An English translation follows.

Propuesta 194 Humberto Barrera

194-1 Se toma nota de la oposición del comentarista al proyecto. Todos los comentarios se han compartido con la Junta de Metro para su consideración. Consultar MR-1: "Selección de alternativas."

194-2 Los carriles-guías de la alternativa preferida a nivel local del tren ligero estarían completamente separados a desnivel de la red vial. Los niveles de ruidos causados por las actividades de construcción y operativas se abordan en la Sección 3.6, «Ruidos y vibraciones», en el Borrador del Reporte de Impacto Ambiental. La iluminación se trata en la Sección 3.3, "Estética", de dicho borrador. La posibilidad de impactos de la alternativa preferida a nivel local se aborda en el Capítulo 4, "Evaluación de las alternativas", también en dicho borrador.

Submission 194 Humberto Barrera

194-1 The commenter's opposition to the project is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

194-2 The LPA light rail guideway would be fully grade-separated from all roadways. Construction and operational noise levels are addressed in Section 3.6, Noise and Vibration, of the Draft EIR. Lighting is discussed in Section 3.3, Aesthetics, of the Draft EIR. The potential for LPA impacts is addressed in Chapter 4, Evaluation of Alternatives, of the Draft EIR.

Submission 195 Daniel G.

195-1 The commenter's opposition to the Metro ROW alignment and support for the Hawthorne Option is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 196 Alex Medina

196-1 The commenter's opposition to the Metro ROW alignment and support for the Hawthorne Option is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 197 Joanna Velazco

197-1 The commenter's opposition to a Metro ROW alignment and support for the Hawthorne Option is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 198 Bryan Henry

198-1 The commenter's opposition to a Metro ROW alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

198-2 As explained on page 3.1-3 of the Draft EIR, traffic delay (often measured by level of service) is no longer permissible as a CEQA impact criterion and therefore this analysis and related topics are not addressed in the Draft EIR. See MR-11: Traffic Delay and Level-of-Service and the 2023 Transportation Detail Report, published concurrently with the Draft EIR, for a discussion of traffic conditions. The LPA is fully grade-separated from all roadways, and would not increase vehicle delay compared to existing conditions.

198-3 See response to Comment 198-1.

Submission 199 Alberto Maldonado

199-1 The commenter's opposition to the Metro ROW alignment is noted. The project would add new safety fencing or other barriers, such as soundwalls. Construction and operational noise levels are addressed in Section 3.6, Noise and Vibration, of the Draft EIR. The potential for LPA impacts is addressed in Chapter 4, Evaluation of Alternatives, of the Draft EIR. See MR-3: Operational Noise Project Features and Mitigation Measures and MR-10: Changes to Community Character.

199-2 The LPA would be fully grade-separated from all roadways. All existing roadway crossings would be maintained so that the community would not be physically divided. See MR-1: Selection of Alternatives.

Submission 200 Megan N. Jorge

200-1 The commenter's opposition to the Metro ROW alignment and support for the Hawthorne Option is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives and MR-10: Changes to Community Character.

Submission 201 Chris Horsman

201-1 The commenter's opposition to the Metro ROW alignment and support for the Hawthorne Option is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives and MR-10: Changes to Community Character.

Submission 202 William Kolinsky

202-1 The commenter's opposition to the Metro ROW alignment and support for the Hawthorne Option is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives and MR-10: Changes to Community Character.

Submission 203 Anonymous

203-1 The commenter's opposition to the Metro ROW alignment and support for the Hawthorne Option is noted. See MR-1: Selection of Alternatives. Additional stations were proposed in Lawndale as part of the 2018 Supplemental Alternatives Analysis, but at the request of Lawndale were removed from consideration. Section 3.6, Noise and Vibration, and Chapter 4, Evaluation of Alternatives, of the Draft EIR, evaluates potential noise impacts of the project, options, and alternatives, and recommend Mitigation Measure MM-NOI-1: Noise Control Plan to reduce noise levels. The operational impacts would be less than significant with mitigation.

Submission 204 Jose Valenzuela

204-1 The commenter's opposition to the Metro ROW alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 205 Jounnna Sanchez

205-1 The commenter's opposition to the Metro ROW alignment and support for the Hawthorne Option is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 206 Michael Stary

206-1 The commenter's opposition to the Metro ROW alignment and support for the Hawthorne Option is noted. All comments have been shared with the Metro Board for their consideration.

206-2 The project has secured funding from Measure R (2008), Measure M (2016), Transit and Intercity Rail Capital Program (TIRCP) Grant from the California State Transportation Agency Transit and Intercity Rail Capital Program, and 3% match contributions from local jurisdictions. Metro is committed to the responsible use of public funds and to managing

project costs efficiently, while continuing to pursue additional funding sources to support project delivery.

Submission 207 Lily Navarro

207-1 The commenter's opposition to the Metro ROW alignment and support for the Hawthorne Option is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 208 Betty Lam

208-1 As described in Chapter 2, Project Description, of the Draft EIR, all roadway crossings along the Metro ROW would include pedestrian safety infrastructure, such as gates and warning devices for light rail and freight. The LPA would be fully grade-separated from all roadways. Metro would provide safety enhancements for the existing at-grade freight crossing at 170th Street. See MR-8: Light Rail and Freight Train Safety.

208-2 The Metro ROW has sufficient space for the project. Refer to Appendix B, Select Advanced Conceptual Engineering Drawings - Locally Preferred Alternative, of the Final EIR for more details on the alignment near 170th Street.

208-3 Metro understands concerns regarding property values. However, under CEQA, economic impacts such as changes in property values are not considered environmental impacts. The Draft EIR focuses on physical environmental impacts and measures to mitigate them, as required by CEQA. To address questions and concerns on property values, Metro has prepared more information. See MR-14: Property Values and Impacts to Businesses.

208-4 See response to Comment 208-1.

208-5 The comment does not raise any significant environmental issues requiring a response.

208-6 The commenter's opposition to the project is noted. All comments have been shared with the Metro Board for their consideration.

208-7 See response to Comment 208-1.

208-8 See response to Comment 208-6.

208-9 Lawndale High School is approximately 1/4 mile north of the project, across on the opposite side of the Interstate 405; the commenter does not clarify how the high school would be affected.

208-10 The commenter's support for the Hawthorne Option is noted. All comments have been shared with the Metro Board for their consideration.

Submission 209 Blake Jung

209-1 The commenter's opposition to the Metro ROW alignment and support for the Hawthorne Option is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

209-2 See MR-16: Response to Lawndale and Redondo Beach Community Letter.

209-3 See MR-16: Response to Lawndale and Redondo Beach Community Letter.

209-4 See MR-16: Response to Lawndale and Redondo Beach Community Letter.

209-5 See MR-16: Response to Lawndale and Redondo Beach Community Letter.

209-6 See MR-16: Response to Lawndale and Redondo Beach Community Letter.

209-7 See MR-16: Response to Lawndale and Redondo Beach Community Letter.

209-8 See MR-16: Response to Lawndale and Redondo Beach Community Letter.

Submission 210 Carlos Gomez

210-1 The commenter's opposition to the Metro ROW alignment and support for the Hawthorne Option is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives. Section 3.4, Air Quality, of the Draft EIR, analyzes impacts related to air quality. The light rail would be powered by electricity and would not generate tailpipe emissions. The commenter makes the general reference to "disruption" as a reason for opposing using the Metro ROW for the project, but does not clarify if it refers to noise, traffic, or any other topic. The Draft EIR fully evaluates potential impacts related to transportation, noise, and air pollution and proposes mitigation measures, where necessary, to reduce potentially significant impacts to the extent feasible. The potential for LPA impacts is addressed in Chapter 4, Evaluation of Alternatives, of the Draft EIR. See MR-2: Operational Noise Analysis Methodology and Impact Thresholds; MR-3: Operational Noise Project Features and Mitigation Measures; MR-4: Potential Negative Health Effects Related to Noise, Vibration, and Air Quality; MR-5: Vibration Impact Types and Impact Thresholds; and MR-11: Traffic Delay and Level-of-Service for more information.

Metro understands concerns regarding property values. However, under CEQA, economic impacts such as changes in property values are not considered environmental impacts. The Draft EIR focuses on physical environmental impacts and measures to mitigate them, as required by CEQA. To address questions and concerns on property values, Metro has prepared more information. See MR-14: Property Values and Impacts to Businesses and MR-10: Changes to Community Character.

Submission 211 Carmen Reyes

211-1 See MR-16: Response to Lawndale and Redondo Beach Community Letter.

211-2 See MR-16: Response to Lawndale and Redondo Beach Community Letter.

211-3 See MR-16: Response to Lawndale and Redondo Beach Community Letter.

211-4 See MR-16: Response to Lawndale and Redondo Beach Community Letter.

211-5 See MR-16: Response to Lawndale and Redondo Beach Community Letter.

211-6 See MR-16: Response to Lawndale and Redondo Beach Community Letter.

211-7 See MR-16: Response to Lawndale and Redondo Beach Community Letter.

Submission 212 Clement Alaba

212-1 The commenter's opposition to the Metro ROW alignment and support for the Hawthorne Option is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Metro understands concerns regarding property values. However, under CEQA, economic impacts such as changes in property values are not considered environmental impacts. The Draft EIR focuses on physical environmental impacts and measures to mitigate them, as required by CEQA. To address questions and concerns on property values, Metro has prepared more information. See MR-14: Property Values and Impacts to Businesses.

To minimize noise impacts, Metro has committed to implementing all reasonable and feasible mitigation measures. With these measures in place, operational noise impacts of the Trench Option, Hawthorne Option, and the LPA would be reduced to less than significant with mitigation. This means the anticipated change in noise levels would remain within acceptable thresholds established by the Federal Transportation Administration (FTA).

Submission 213 David Barajas

213-1 See MR-16: Response to Lawndale and Redondo Beach Community Letter.

213-2 Metro understands concerns regarding property values. However, under CEQA, economic impacts such as changes in property values are not considered environmental impacts. The Draft EIR focuses on physical environmental impacts and measures to mitigate them, as required by CEQA. To address questions and concerns on property values, Metro has prepared more information. See MR-14: Property Values and Impacts to Businesses.

213-3 See MR-16: Response to Lawndale and Redondo Beach Community Letter.

213-4 See MR-16: Response to Lawndale and Redondo Beach Community Letter.

213-5 See MR-16: Response to Lawndale and Redondo Beach Community Letter.

213-6 See MR-16: Response to Lawndale and Redondo Beach Community Letter.

213-7 See MR-16: Response to Lawndale and Redondo Beach Community Letter.

213-8 See MR-16: Response to Lawndale and Redondo Beach Community Letter.

Submission 214 Doug Boswell

214-1 The commenter's opposition to the Metro ROW alignment and support for the Hawthorne Option is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Project effects related to air quality, noise, and soil stability are addressed in Sections 3.6, 3.4, and 3.8, respectively, of the Draft EIR. The potential for LPA impacts is addressed in Chapter 4, Evaluation of Alternatives, of the Draft EIR. See MR-3: Operational Noise Project Features and Mitigation Measures; MR-8: Light Rail and Freight Train Safety; and MR-13: Soil Stability and Sinkholes.

Submission 215 Jacqueline Caro

215-1 The commenter's support for the Metro ROW alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

215-2 Soundwalls would be implemented to mitigate noise generated by the light rail and, to some extent, noise generated by the freight trains as required by Mitigation Measures MM-NOI-2: Soundwalls. However, two primary sources of freight train noise – diesel engines and the horn – are less effectively mitigated by soundwalls due to the height of the engines and horn as well as the decibel level of the horn.

The project includes Project Feature PF-NV-1: Quiet Zone Equipment Installation, which provides that the project would include the upgrades to at-grade freight crossing necessary to allow for a quiet zone to be established. In addition, pursuant to Mitigation Measure MM-NOI-4: Quiet Zone Establishment, Metro would support the local cities in applying for the quiet zone establishment made possible by the project's upgrades to the existing freight crossings. Establishing a quiet zone would reduce freight noise overall along the Metro ROW by eliminating one of the primary sources of noise from freight trains, the horn, which produces a noise level of 110 dBA (a-weighted decibel). See MR-3: Operational Noise Project Features and Mitigation Measures.

215-3 The commenter's support for the High-Frequency Bus Alternative is noted. All comments have been shared with the Metro Board for their consideration.

215-4 The commenter's opposition to the Hawthorne Option is noted. All comments have been shared with the Metro Board for their consideration.

215-5 Section 3.1, Transportation, of the Draft EIR, includes a detailed evaluation of the potential for visibility obstructions, starting on page 3.1-48. Based on the evaluation, the potential for significant impacts related to hazards associated with geometric design features, including those related to visibility obstructions would be less than significant.

As explained on page 3.1-3 of the Draft EIR, traffic delay (often measured by level of service) is no longer permissible as a CEQA impact criterion and therefore this analysis and related topics are not addressed in the Draft EIR. See MR-11: Traffic Delay and Level-of-Service and the 2023 Transportation Detail Report, published concurrently with the Draft EIR, for a discussion of traffic conditions. The LPA light rail guideway is fully grade-separated from all roadways, and would not increase vehicle delay compared to existing conditions. The potential for LPA impacts is addressed in Chapter 4, Evaluation of Alternatives, of the Draft EIR.

215-6 Cut-through traffic would not occur from vehicles avoiding the train, as the Hawthorne Option would be elevated and fully grade-separated from vehicles.

215-7 The light rail guideway includes walkways for maintenance. Traffic lanes would not need to be shut down during operation of the Hawthorne Option.

215-8 Cost for utility relocation of both public and private utilities was included in the total cost published in the 2023 Cost Estimates Summary for all alternatives and options. See MR-21: Cost Estimates and Schedule.

Submission 216 Jimmy Gow

216-1 The commenter's support for the Metro ROW alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

216-2 See MR-17: Response to Torrance Community Letter.

216-3 See MR-17: Response to Torrance Community Letter.

216-4 See MR-17: Response to Torrance Community Letter.

Submission 217 Jonathon Chue

217-1 The commenter's support of the Hawthorne Option is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

217-2 See response to Comment 217-1.

217-3 Metro would continue to coordinate with the South Bay Galleria in future phases of design regarding pedestrian connections.

217-4 The LPA includes a station at the Redondo Beach Transit Center. Before making a final determination on the project, the Metro Board will review the comments and responses included in the Final EIR and will consider multiple factors, including environmental impacts, benefits, and costs.

217-5 The commenter's support for the project is noted. All comments have been shared with the Metro Board for their consideration.

Submission 218 Wendy Mretandes

218-1 The commenter's opposition to the Metro ROW alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

The following commenter made their comment in Spanish. Its response is given first in Spanish. An English translation follows.

Propuesta 219 Teresa Gutierrez

219-1 Se toma nota de la oposición del comentarista al proyecto. Todos los comentarios se han compartido con la Junta de Metro para su consideración. Consultar MR-1: "Selección de alternativas", MR-3: "Elementos del proyecto relacionados con el ruido de las operaciones y medidas de mitigación", MR-10: "Cambios en el carácter de la comunidad" y MR-12: "Acceso a los servicios de emergencia."

Submission 219 Teresa Gutierrez

219-1 The commenter's opposition to the project is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives, MR-3: Operational Noise Project Features and Mitigation Measures, MR-10: Changes to Community Character, and MR-12: Emergency Access.

Submission 220 Jessica L. Ray

220-1 The commenter's opposition to the project in their neighborhood is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

220-2 See MR-8: Light Rail and Freight Train Safety.

220-3 Noise is addressed in Section 3.6, Noise and Vibration, of the Draft EIR. The potential for LPA impacts is addressed in Chapter 4, Evaluation of Alternatives, of the Draft EIR. See MR-4: Potential Negative Health Effects Related to Noise, Vibration, and Air Quality.

220-4 The commenter's support for the Hawthorne Option is noted. All comments have been shared with the Metro Board for their consideration.

Submission 221 Juan Benitez

221-1 The commenter's opposition to the project is noted. All comments have been shared with the Metro Board for their consideration.

Section 3.6, Noise and Vibration, and Chapter 4, Evaluation of Alternatives, of the Draft EIR describes the noise impacts of the project, options, and alternatives. Operational noise impacts for all alternatives and options would be reduced to less than significant or less than significant with mitigation, except the Metro Elevated/At-Grade Alignment. The potential for LPA impacts is addressed in Chapter 4, Evaluation of Alternatives, of the Draft

EIR. See MR-3: Operational Noise Project Features and Mitigation Measures. The project would connect to the existing bus system, as well as the regional rail network, expanding access to different parts of the region. See MR-10: Changes to Community Character and MR-11: Traffic Delay and Level-of-Service.

221-2 See response to Comment 221-1.

The following commenter made their comment in Spanish. Its response is given first in Spanish. An English translation follows.

Propuesta 222 Carmen M.

222-1 Se toma nota de la oposición del comentarista al proyecto. Todos los comentarios se han compartido con la Junta de Metro para su consideración. Consultar MR-1: "Selección de alternativas."

Submission 222 Carmen M.

222-1 The commenter's opposition to the project is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 223 Fernando

223-1 The commenter's opposition to the Metro ROW alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

223-2 See MR-8: Light Rail and Freight Train Safety.

Submission 224 James Johnson

224-1 The commenter's opposition to the Metro ROW alignment and support for the Hawthorne Option is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 225 Guillermo Chavez

225-1 Noise is addressed in Section 3.6, Noise and Vibration, of the Draft EIR. The potential for LPA impacts is addressed in Chapter 4, Evaluation of Alternatives, of the Draft EIR. See MR-3: Operational Noise Project Features and Mitigation Measures.

Submission 226 Macario Gastelum

226-1 The comment is illegible. See MR-1: Selection of Alternatives.

The following commenter made their comment in Spanish. Its response is given first in Spanish. An English translation follows.

Propuesta 227 Albely Cobon

227-1 Tal como se detalla en la Sección 3.6, "Ruidos y vibraciones", en el Borrador del Reporte de Impacto Ambiental, el proyecto implementaría medidas de mitigación para minimizar los impactos del ruido. Medidas de mitigación MM-NOI-2: Muros contra sonido y MM-NOI-3: Corazones de cruzamiento de bajo impacto que reducirían el ruido operativo por debajo de los umbrales de significancia para la mayoría de los receptores vulnerables, incluidos los ubicados en zonas residenciales, tanto de día como de noche. Consultar MR-3: "Elementos del proyecto relacionados con el ruido de las operaciones y medidas de mitigación" y MR-4: "Posibles efectos negativos a la salud relacionados con el ruido, las vibraciones y la calidad del aire."

Según la alternativa preferida a nivel local, la opción de trinchera y la opción de Hawthorne, los carriles-guías del tren ligero estarían completamente separados a desnivel de la red vial, eliminando así la necesidad de usar las alarmas a nivel en los cruces del tren ligero. Tal como se describe en el capítulo 4, "Evaluación de alternativas" en el Borrador del Reporte de Impacto Ambiental y en el capítulo 2, "Descripción de la alternativa preferida a nivel local" del Reporte de Impacto Ambiental Final, los impactos del ruido causado por las actividades operativas de la alternativa preferida a nivel local se reducirían a "insignificantes con mitigación" para todos los receptores vulnerables. Consultar MR-1: "Selección de alternativas."

Submission 227 Albely Cobon

227-1 As detailed in Section 3.6, Noise and Vibration, of the Draft EIR, the project would implement mitigation measures to minimize noise impacts. Mitigation Measures MM-NOI-2: Soundwalls and MM-NOI-3: Low Impact Frogs, which would reduce operational noise to below the daytime and nighttime noise thresholds of significance for most sensitive receptors, including those in residential areas. See MR-3: Operational Noise Project Features and Mitigation Measures and MR-4: Potential Negative Health Effects Related to Noise, Vibration, and Air Quality.

Under the LPA, Trench Option, and Hawthorne Option, the light rail guideway would be fully grade-separated from all roadways, eliminating the need for light rail at-grade bell crossing bells. As described in Chapter 4, Evaluation of Alternatives, in the Draft EIR, and Chapter 2, Description of the Locally Preferred Alternative, of the Final EIR, operational noise impacts of the LPA would be reduced to less than significant with mitigation at all sensitive receptors. See MR-1: Selection of Alternatives.

Submission 228 Anonymous

228-1 The commenter's opposition to using the Metro ROW alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives and MR-10: Changes to Community Character.

Submission 229 Juan Guzman

229-1 The commenter's opposition to the project is noted. As explained on page 3.1-3 of the Draft EIR, traffic delay (often measured by level of service) is no longer permissible as a CEQA impact criterion and therefore this analysis and related topics are not addressed in the Draft EIR. See MR-11: Traffic Delay and Level-of-Service and the 2023 Transportation Detail Report, published concurrently with the Draft EIR, for a discussion of traffic conditions. The LPA light rail guideway is fully grade-separated from all roadways, and would not increase vehicle delay compared to existing conditions.

Submission 230 Ashley Guzman

230-1 The commenter's opposition to the project is noted. As explained on page 3.1-3 of the Draft EIR, traffic delay (often measured by level of service) is no longer permissible as a CEQA impact criterion and therefore this analysis and related topics are not addressed in the Draft EIR. See MR-11: Traffic Delay and Level-of-Service and the 2023 Transportation Detail Report, published concurrently with the Draft EIR, for a discussion of traffic conditions. The LPA is fully grade-separated from all roadways, and would not increase vehicle delay compared to existing conditions.

The following commenter made their comment in Spanish. Its response is given first in Spanish. An English translation follows.

Propuesta 231 Arcelia Martinez

231-1 Se toma nota de la oposición del comentarista al proyecto. Tal como se explica en la página 3.1-3 del Borrador del Reporte de Impacto Ambiental, las demoras en el tráfico (frecuentemente medidas por el nivel del servicio) ya no se consideran como un criterio de impacto conforme a la Ley de Calidad Ambiental de California y, por lo tanto, este análisis y temas relacionadas no se abordan en dicho borrador. Consultar MR-11: «Demoras en el tráfico y nivel de servicio» y «Reporte detallado de transporte de 2023» publicados conjuntamente con el Borrador del Reporte de Impacto Ambiental para tratar las condiciones de tránsito. Los carriles-guías del tren ligero de la alternativa preferida a nivel local están completamente separados a desnivel de la red vial y no aumentarían las demoras de los vehículos en comparación con las condiciones existentes. El ruido se aborda en la Sección 3.6, «Ruidos y vibraciones», en el Borrador del Reporte de Impacto Ambiental. La posibilidad de impactos de la alternativa preferida a nivel local se aborda en el Capítulo 4, «Evaluación de las alternativas», también en dicho borrador. Consultar MR-1: «Selección de alternativas», MR-3: "Elementos del proyecto relacionados con el ruido de las operaciones y medidas de mitigación", MR-10: "Cambios en el carácter de la comunidad" y MR-12: "Acceso a los servicios de emergencia."

Submission 231 Arcelia Martinez

231-1 The commenter's opposition to the project is noted. As explained on page 3.1-3 of the Draft EIR, traffic delay (often measured by level of service) is no longer permissible as a CEQA impact criterion and therefore this analysis and related topics are not addressed in the Draft EIR. See MR-11: Traffic Delay and Level-of-Service and the 2023 Transportation

Detail Report, published concurrently with the Draft EIR, for a discussion of traffic conditions. The LPA light rail guideway is fully grade-separated from all roadways, and would not increase vehicle delay compared to existing conditions. Noise is addressed in Section 3.6, Noise and Vibration, of the Draft EIR. The potential for LPA impacts is addressed in Chapter 4, Evaluation of Alternatives, of the Draft EIR. See MR-1: Selection of Alternatives, MR-3: Operational Noise Project Features and Mitigation Measures, MR-10: Changes to Community Character, and MR-12: Emergency Access.

Submission 232 Wendy Martinez

232-1 The commenter's opposition to the Metro ROW alignment and support for the Hawthorne Option is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 233 Adelina Rodriguez

233-1 The commenter's opposition to the Metro ROW alignment is noted. See MR-1: Selection of Alternatives. All comments have been shared with the Metro Board for their consideration.

The potential for air quality and noise impacts is addressed in Sections 3.4, Air Quality, and 3.6, Noise and Vibration, of the Draft EIR. The potential for LPA impacts is addressed in Chapter 4, Evaluation of Alternatives, of the Draft EIR. See MR-3: Operational Noise Project Features and Mitigation Measures and MR-4: Potential Negative Health Effects Related to Noise, Vibration, and Air Quality.

Submission 234 Frank A. Rodriguez

234-1 The commenter's opposition to the Metro ROW alignment is noted. See MR-1: Selection of Alternatives. The potential for air quality and noise impacts is addressed in Sections 3.4, Air Quality, and 3.6, Noise and Vibration, of the Draft EIR. Metro understands the importance of maintaining a quiet environment at night, and Metro is committed to minimizing the noise impacts of the project. Metro would implement Mitigation Measures MM-NOI-2: Soundwalls and MM-NOI-3: Low Impact Frogs to reduce nighttime noise levels at sensitive receptors along the alignment. The potential for LPA impacts is addressed in Chapter 4, Evaluation of Alternatives, of the Draft EIR. The LPA significantly reduces noise impacts compared to the Elevated/At-Grade Alignment because it eliminates the at-grade crossings at 170th and 182nd Streets. By grade separating the light rail from all roadways, the LPA removes the need for audible warning at light rail crossings, such as routine train horns and crossing bells. See MR-3: Operational Noise Project Features and Mitigation Measures and MR-4: Potential Negative Health Effects Related to Noise, Vibration, and Air Quality.

Submission 235 Fredy Rojas

235-1 The commenter's opposition to Metro ROW alignment and support for the Hawthorne Option is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

235-2 See MR-8: Light Rail and Freight Train Safety.

The following commenter made their comment in Spanish. Its response is given first in Spanish. An English translation follows.

Propuesta 236 Guadalupe Alvaro

236-1 Se toma nota de la oposición del comentarista a la alineación en el derecho de paso de Metro y su apoyo a la Opción de Hawthorne. Todos los comentarios se han compartido con la Junta de Metro para su consideración. Consultar MR-1: "Selección de alternativas."

Submission 236 Guadalupe Alvaro

236-1 The commenter's opposition to the Metro ROW alignment and support for the Hawthorne Option is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 237 Rose Molina

237-1 The commenter's opposition to the project is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives and MR-9: Light Rail Security.

Submission 238 William Tiernan

238-1 The commenter's opposition to the project is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 239 Lorena Rodriguez

239-1 The commenter's opposition to the project is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 240 Rebeca Aquino

240-1 The commenter's opposition to the project is noted. The potential for air quality and noise impacts is addressed in Sections 3.4, Air Quality, and 3.6, Noise and Vibration, of the Draft EIR. See MR-10: Changes to Community Character.

As explained on page 3.1-3 of the Draft EIR, traffic delay (often measured by level of service) is no longer permissible as a CEQA impact criterion and therefore this analysis and related topics are not addressed in the Draft EIR. See MR-11: Traffic Delay and Level-of-Service and the 2023 Transportation Detail Report, published concurrently with the Draft

EIR, for a discussion of traffic conditions. The LPA is fully grade-separated from all roadways, and would not increase vehicle delay compared to existing conditions. The potential for LPA impacts is addressed in Chapter 4, Evaluation of Alternatives, of the Draft EIR.

Submission 241 Bryan Chavez

241-1 The commenter's opposition to the project is noted. See MR-1: Selection of Alternatives. The potential for noise impacts is addressed in Section 3.6, Noise and Vibration, of Draft EIR. The potential for LPA impacts is addressed in Chapter 4, Evaluation of Alternatives, of the Draft EIR. See MR-3: Operational Noise Project Features and Mitigation Measures and MR-4: Potential Negative Health Effects Related to Noise, Vibration, and Air Quality.

Submission 242 Dodeo Doviz

242-1 The commenter's opposition to the Metro ROW alignment and support for the Hawthorne Option is noted. See MR-1: Selection of Alternatives. The potential for noise and vibration impacts is addressed in Section 3.6, Noise and Vibration, of Draft EIR. The Metro ROW alignments would include upgrades to existing freight crossings, allowing for the establishment of a Federal Railroad Administration quiet zone. The potential for LPA impacts is addressed in Chapter 4, Evaluation of Alternatives, of the Draft EIR. See MR-3: Operational Noise Project Features and Mitigation Measures.

The following commenter made their comment in Spanish. Its response is given first in Spanish. An English translation follows.

Propuesta 243 Jorge Garcia N.

243-1 Se toma nota de la oposición del comentarista a la alineación en el derecho de paso de Metro y su apoyo a la Opción de Hawthorne. Consultar MR-1: "Selección de alternativas." Los posibles impactos causados por el ruido y las vibraciones se abordan en la Sección 3.6, "Ruidos y vibraciones", en el Borrador del Reporte de Impacto Ambiental. La posibilidad de impactos de la alternativa preferida a nivel local se aborda en el Capítulo 4, "Evaluación de las alternativas", también en dicho borrador. Consultar MR-3: "Elementos del proyecto relacionados con el ruido de las operaciones y medidas de mitigación" y MR-4: "Posibles efectos negativos a la salud debido al ruido, las vibraciones y la calidad del aire."

Submission 243 Jorge Garcia N.

243-1 The commenter's opposition to the Metro ROW alignment and support for the Hawthorne Option is noted. See MR-1: Selection of Alternatives. The potential for noise and vibration impacts is addressed in Section 3.6, Noise and Vibration, of Draft EIR. The potential for LPA impacts is addressed in Chapter 4, Evaluation of Alternatives, of the Draft EIR. See MR-3: Operational Noise Project Features and Mitigation Measures and MR-4: Potential Negative Health Effects Related to Noise, Vibration, and Air Quality.

The following commenter made their comment in Spanish. Its response is given first in Spanish. An English translation follows.

Propuesta 244 Marychuy Orendain

244-1 Se toma nota de la oposición del comentarista al proyecto. Todos los comentarios se han compartido con la Junta de Metro para su consideración. Consultar MR-1: "Selección de alternativas."

244-2 Se toma nota de la oposición del comentarista al proyecto. Consultar la Sección 3.6 "Ruidos y vibraciones", la Sección 3.9 "Peligros y materiales peligrosos" en el Borrador del Reporte de Impacto Ambiental, MR-4: "Posibles efectos negativos a la salud relacionados con el ruido, las vibraciones y la calidad del aire"; MR-9: "Seguridad del tren ligero"; y MR-10: "Cambios en el carácter de la comunidad." La posibilidad de impactos de la alternativa preferida a nivel local se aborda en el Capítulo 4, "Evaluación de las alternativas", también en dicho borrador.

Submission 244 Marychuy Orendain

244-1 The commenter's opposition to the project is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

244-2 The commenter's opposition to the project is noted. See Sections 3.6, Noise and Vibration, and 3.9, Hazards and Hazardous Materials, of the Draft EIR; MR-4: Potential Negative Health Effects Related to Noise, Vibration, and Air Quality; MR-9: Light Rail Security; and MR-10: Changes to Community Character. The potential for LPA impacts is addressed in Chapter 4, Evaluation of Alternatives, of the Draft EIR.

Submission 245 Martha Dilger

245-1 The commenter's opposition to the Metro ROW alignment and support for the Hawthorne Option is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives and MR-10: Changes to Community Character.

Submission 246 Annette Owens

246-1 Metro acknowledges the historical concerns raised about infrastructure projects disproportionately affecting lower-income communities. Over the years, Metro has taken meaningful steps to ensure that its projects are equitable and benefit all residents. For this project, Metro has engaged in extensive community outreach to understand and address local concerns. The project design includes numerous features to minimize disruption and maximize safety, environmental benefits, and mobility for the surrounding neighborhoods. The Draft EIR thoroughly evaluates the potential impacts raised in this comment in Section 3.2, Land Use, Section 3.6, Noise and Vibration, Section 3.9, Hazards and Hazardous Materials, and Section 3.11, Utilities and Service Systems. As discussed in Chapter 3.0, Affected Environment and Environmental Impact Analyses, of the Draft EIR,

Metro proposes mitigation measures and project features to reduce or avoid impacts from the project.

See MR-4: Potential Negative Health Effects Related to Noise, Vibration, and Air Quality, MR-7: Utility Relocation and Hazardous Materials Safety, and MR-8: Light Rail and Freight Train Safety for additional information.

Submission 247 Traci Fuentes

247-1 The commenter's opposition to the project in Lawndale is noted. See MR-1: Selection of Alternatives. The potential for noise and vibration impacts is addressed in Section 3.6, Noise and Vibration, of Draft EIR. The potential for LPA impacts is addressed in Chapter 4, Evaluation of Alternatives, of the Draft EIR. See MR-3: Operational Noise Project Features and Mitigation Measures.

247-2 The potential for noise and vibration impacts is addressed in Section 3.6, Noise and Vibration, of Draft EIR. The potential for LPA impacts is addressed in Chapter 4, Evaluation of Alternatives, of the Draft EIR. See MR-3: Operational Noise Project Features and Mitigation Measures.

Submission 248 Iris Sosa

248-1 The commenter's opposition to the project is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives and MR-10: Changes to Community Character.

Submission 249 Frank Fuentes Jr.

249-1 The commenter's opposition to the Metro ROW alignment and support for the Hawthorne Option is noted. The LPA would be fully grade-separated from all roadways, removing the need for light rail at-grade crossing bells and gates. None of the light rail alignment options under consideration would affect traffic waiting times at the existing at-grade freight crossings. See MR-1: Selection of Alternatives.

The potential for noise and vibration impacts is addressed in Section 3.6, Noise and Vibration, of Draft EIR. See MR-3: Operational Noise Project Features and Mitigation Measures. The Metro ROW alignments would include upgrades to existing freight crossings, allowing for the establishment of a Federal Railroad Administration quiet zone. None of the light rail alignment options under consideration would affect traffic waiting times at the existing at-grade freight crossings. See MR-11: Traffic Delay and Level-of-Service. Moreover, the LPA would eliminate the need for light rail warning bells at the at-grade crossings by grade separating the tracks there. Therefore, the LPA, as mitigated, would have a less than significant operational noise impact with mitigation. The Trench Option and Hawthorne Option would likewise have less than significant operational noise impacts with mitigation. The potential for LPA impacts is addressed in Chapter 4, Evaluation of Alternatives, of the Draft EIR. See MR-1: Selection of Alternatives and MR-10: Changes to Community Character.

249-2 The commenter's support for the Hawthorne Option is noted. All comments have been shared with the Metro Board for their consideration. Although some residents use the Metro ROW for recreational activities, this use is not authorized or compliant with freight safety standards. The project would add multi-use recreational paths parallel to the rail tracks at several points along the alignment, which would improve the functionality of the space while ensuring public safety. See MR-10: Changes to Community Character.

Submission 250 Derrick Gregory

250-1 The commenter's opposition to the project is noted. All comments have been shared with the Metro Board for their consideration. Metro understands concerns regarding property values. However, under CEQA, economic impacts such as changes in property values are not considered environmental impacts. The Draft EIR focuses on physical environmental impacts and measures to mitigate them, as required by CEQA. To address questions and concerns on property values, Metro has prepared more information. See MR-14: Property Values and Impacts to Businesses and MR-9: Light Rail Security.

Submission 251 Humberto Barrera Jr

251-1 Metro understands the importance of maintaining an environment conducive to professional performance and focus. As detailed in Section 3.6, Noise and Vibration, of the Draft EIR, noise levels in areas near the alignment options have been carefully modeled, and where mitigation is necessary, measures have been proposed to reduce noise impacts to less than significant where feasible. See MR-3: Operational Noise Project Features and Mitigation Measures.

The LPA significantly reduces noise impacts compared to the Elevated/At-Grade Alignment because it eliminates the at-grade crossings at 170th and 182nd Streets. By grade separating the light rail from all roadways, the LPA removes the need for audible warning at light rail crossings, such as routine train horns and crossing bells. As described in Chapter 4, Evaluation of Alternatives, of the Draft EIR and Chapter 2, Description of the Locally Preferred Alternative, of the Final EIR, the operational noise impacts of the LPA would be reduced to less than significant with mitigation. See MR-1: Selection of Alternatives.

Submission 252 Ana Barrera

252-1 The commenter's opposition to the project is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

The following commenter made their comment in Spanish. Its response is given first in Spanish. An English translation follows.

Propuesta 253 Juan Almaraz

253-1 Se toma nota de la oposición del comentarista al proyecto. El ruido se aborda en la Sección 3.6, "Ruidos y vibraciones", en el Borrador del Reporte de Impacto Ambiental. La posibilidad de impactos de la alternativa preferida a nivel local se aborda en el Capítulo 4,

"Evaluación de las alternativas", también en dicho borrador. Consultar MR-1: "Selección de alternativas", MR-3: "Elementos del proyecto relacionados con el ruido de las operaciones y medidas de mitigación", MR-10: "Cambios en el carácter de la comunidad" y MR-12: "Acceso a los servicios de emergencia."

Submission 253 Juan Almaraz

253-1 The commenter's opposition to the project is noted. Noise is addressed in Section 3.6, Noise and Vibration, of Draft EIR. The potential for LPA impacts is addressed in Chapter 4, Evaluation of Alternatives, of the Draft EIR. See MR-1: Selection of Alternatives, MR-3: Operational Noise Project Features and Mitigation Measures, MR-10: Changes to Community Character, and MR-12: Emergency Access.

Submission 254 Oscar Barrera

254-1 Noise is addressed in Section 3.6, Noise and Vibration, of Draft EIR. The potential for LPA impacts is addressed in Chapter 4, Evaluation of Alternatives, of the Draft EIR. See MR-3: Operational Noise Project Features and Mitigation Measures; MR-4: Potential Negative Health Effects Related to Noise, Vibration, and Air Quality; and MR-10: Changes to Community Character.

Submission 255 Anthony Fuentes

255-1 The commenter's opposition to the Metro ROW alignment and support for the Hawthorne Option is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 256 Piles J. Dilger

256-1 The commenter's opposition to the Metro ROW alignment and support for the Hawthorne Option is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives and MR-10: Changes to Community Character.

Submission 257 Susana Barrera

257-1 The commenter's opposition to the proposed light rail extension within the City of Redondo Beach is noted. See MR-1: Selection of Alternatives.

See Section 3.6, Noise and Vibration, of the Draft EIR, for a detailed noise analysis associated with the project. The potential for LPA impacts is addressed in Chapter 4, Evaluation of Alternatives, of the Draft EIR. See MR-3: Operational Noise Project Features and Mitigation Measures, MR-10: Changes to Community Character, and MR-11: Traffic Delay and Level-of-Service.

Submission 258 Veronica Lopez

258-1 The commenter's opposition to the Metro ROW alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

See MR-8: Light Rail and Freight Train Safety.

Metro understands concerns regarding property values. However, under CEQA, economic impacts such as changes in property values are not considered environmental impacts. The Draft EIR focuses on physical environmental impacts and measures to mitigate them, as required by CEQA. To address questions and concerns on property values, Metro has prepared more information. See MR-14: Property Values and Impacts to Businesses.

Submission 259 Dominic Sanchez

259-1 The commenter's opposition to a Metro ROW alignment and support for the Hawthorne Option is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives and MR-10: Changes to Community Character.

Submission 260 Robert A. Salone

260-1 As demonstrated in Section 3.4, Air Quality, of the Draft EIR, operation of the proposed light rail project would have a beneficial effect on air quality within the region due to a switch from passenger vehicles to light rail transit. See Section 3.6, Noise and Vibration, of the Draft EIR; MR-3: Operational Noise Project Features and Mitigation Measures; MR-10: Changes to Community Character; and MR-18: Homelessness. The potential for LPA impacts is addressed in Chapter 4, Evaluation of Alternatives, of the Draft EIR.

Submission 261 Marquise Riley

261-1 The commenter's opposition to the project is noted. See MR-1: Selection of Alternatives. See Section 3.4, Air Quality, of the Draft EIR; Section 3.6, Noise and Vibration, of the Draft EIR; and MR-10: Changes to Community Character. The potential for LPA impacts is addressed in Chapter 4, Evaluation of Alternatives, of the Draft EIR.

Submission 262 Judy Wells

262-1 See Section 3.6, Noise and Vibration, of the Draft EIR; MR-3: Operational Noise Project Features and Mitigation Measures; and MR-9: Light Rail Security. The potential for LPA impacts is addressed in Chapter 4, Evaluation of Alternatives, of the Draft EIR.

Submission 263 Scott

263-1 Metro understands concerns regarding property values. However, under CEQA, economic impacts such as changes in property values are not considered environmental impacts. The Draft EIR focuses on physical environmental impacts and measures to mitigate them, as required by CEQA. To address questions and concerns on property values, Metro has

prepared more information. See MR-14: Property Values and Impacts to Businesses. Also see MR-10: Changes to Community Character and MR-9: Light Rail Security.

263-2 The potential for air quality, noise, and vibration impacts are addressed in Sections 3.4, Air Quality, and 3.6, Noise and Vibration, of the Draft EIR. The potential for LPA impacts is addressed Chapter 4, Evaluation of Alternatives, of the Draft EIR. See MR-3: Operational Noise Project Features and Mitigation Measures, MR-4: Potential Negative Health Effects Related to Noise, Vibration, and Air Quality, MR-9: Light Rail Security, MR-10: Changes to Community Character.

Submission 264 Elizabeth Meister

264-1 The commenter's opposition to the Metro ROW alignment and support for the Hawthorne Option is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

264-2 The commenter's opposition to the project is noted. All comments have been shared with the Metro Board for their consideration.

Submission 265 Jeremy Brown

265-1 The commenter's opposition to the project is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives and MR-10: Changes to Community Character.

Submission 266 Jeffrey Braude

266-1 The commenter's opposition to Metro ROW alignment and support for the Hawthorne Option is noted. All comments have been shared with the Metro Board for their consideration.

266-2 The commenter's opposition to the project is noted. All comments have been shared with the Metro Board for their consideration.

Submission 267 Jennifer Lamb

267-1 The commenter's opposition to the Metro ROW alignment and support for the Hawthorne Option is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives and MR-10: Changes to Community Character.

Submission 268 Andrew Nunez

268-1 The commenter's opposition to the project is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

The following commenter made their comment in Spanish. Its response is given first in Spanish. An English translation follows.

Propuesta 269 Delfina de Leon

269-1 Se toma nota de la oposición del comentarista a la alineación en el derecho de paso de Metro. Consultar la Sección 3.6, "Ruidos y vibraciones", en el Borrador del Reporte de Impacto Ambiental y MR-10: "Cambios en el carácter de la comunidad." La posibilidad de impactos de la alternativa preferida a nivel local se aborda en el Capítulo 4, "Evaluación de las alternativas", también en dicho borrador.

Submission 269 Delfina de Leon

269-1 The commenter's opposition to the Metro ROW alignment is noted. See Section 3.6, Noise and Vibration, of the Draft EIR, and MR-10: Changes to Community Character. The potential for LPA impacts is addressed in Chapter 4, Evaluation of Alternatives, of the Draft EIR.

The following commenter made their comment in Spanish. Its response is given first in Spanish. An English translation follows.

Propuesta 270 Rosalina Gutierrez

270-1 Se toma nota de la oposición del comentarista al proyecto. Consultar MR-1: "Selección de alternativas", MR-3: "Elementos del proyecto relacionados con el ruido de las operaciones y medidas de mitigación", MR-10: "Cambios en el carácter de la comunidad" y MR-12: "Acceso a los servicios de emergencia."

Submission 270 Rosalina Gutierrez

270-1 The commenter's opposition to the project is noted. See MR-1: Selection of Alternatives, MR-3: Operational Noise Project Features and Mitigation Measures, MR-10: Changes to Community Character, and MR-12: Emergency Access.

Submission 271 Dezarae Ibarra

271-1 The commenter's opposition to the Metro ROW alignment and support for the Hawthorne Option is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 272 Steven Duran

272-1 The commenter's opposition to the Metro ROW alignment and support for the Hawthorne Option is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

272-2 The commenter's opposition to the project is noted. All comments have been shared with the Metro Board for their consideration.

The following commenter made their comment in Spanish. Its response is given first in Spanish. An English translation follows.

Propuesta 273 Soledad Linares

273-1 Se toma nota de la oposición del comentarista al proyecto. Consultar la Sección 3.6 "Ruidos y vibraciones" en el Borrador del Reporte de Impacto Ambiental y MR-10: "Cambios en el carácter de la comunidad." La posibilidad de impactos de la alternativa preferida a nivel local se aborda en el Capítulo 4, "Evaluación de las alternativas", en el Borrador del Reporte de Impacto Ambiental.

Submission 273 Soledad Linares

273-1 The commenter's opposition to the project is noted. See Section 3.6, Noise and Vibration, of the Draft EIR, and MR-10: Changes to Community Character. The potential for LPA impacts is addressed in Chapter 4, Evaluation of Alternatives, of the Draft EIR.

The following commenter made their comment in Spanish. Its response is given first in Spanish. An English translation follows.

Propuesta 274 Ma Del Rosario Almaraz

274-1 Se toma nota de la oposición del comentarista al proyecto. Consultar la Sección 3.1 "Transporte" y la Sección 3.6 "Ruidos y vibraciones" en el Borrador del Reporte de Impacto Ambiental.

Tal como se explica en la página 3.1-3 del Borrador del Reporte de Impacto Ambiental, las demoras en el tráfico (frecuentemente medidas por el nivel del servicio) ya no se consideran como un criterio de impacto conforme a la Ley de Calidad Ambiental de California y, por lo tanto, este análisis y temas relacionadas no se abordan en dicho borrador. Consultar MR-11: "Demoras en el tráfico y nivel de servicio" y "Reporte detallado de transporte de 2023" publicados conjuntamente con el Borrador del Reporte de Impacto Ambiental para tratar las condiciones de tránsito. La posibilidad de impactos de la alternativa preferida a nivel local se aborda en el Capítulo 4, "Evaluación de las alternativas", en el Borrador del Reporte de Impacto Ambiental. La alternativa preferida a nivel local está completamente separada a desnivel de la red vial y no aumentaría las demoras de los vehículos en comparación con las condiciones existentes.

Submission 274 Ma Del Rosario Almaraz

274-1 The commenter's opposition to the project is noted. See Section 3.1, Transportation, of the Draft EIR and Section 3.6, Noise and Vibration of the Draft EIR.

As explained on page 3.1-3 of the Draft EIR, traffic delay (often measured by level of service) is no longer permissible as a CEQA impact criterion and therefore this analysis and related topics are not addressed in the Draft EIR. See MR-11: Traffic Delay and Level-of-Service and the 2023 Transportation Detail Report, published concurrently with the Draft EIR, for a discussion of traffic conditions. The potential for LPA impacts is addressed in

Chapter 4, Evaluation of Alternatives, of the Draft EIR. The LPA is fully grade-separated from all roadways, and would not increase vehicle delay compared to existing conditions.

Submission 275 Jennifer Lee

275-1 The commenter's opposition to the project is noted. See MR-1: Selection of Alternatives.

The LPA would be fully grade-separated from all roadways, and would not increase traffic congestion. As explained on page 3.1-3 of the Draft EIR, traffic delay (often measured by level of service) is no longer permissible as a CEQA impact criterion and therefore this analysis and related topics are not addressed in the Draft EIR. See MR-11: Traffic Delay and Level-of-Service and the 2023 Transportation Detail Report, published concurrently with the Draft EIR, for a discussion of traffic conditions.

Section 3.6, Noise and Vibration, of the Draft EIR, analyzes changes in noise as a result of project implementation. With mitigation, the LPA, Trench Option and Hawthorne Option would not result in significant and unavoidable operational noise impacts. In contrast the Elevated/At-Grade Alignment, would require light rail warning bells at at-grade crossings, which is identified as the source of its significant, unmitigable noise impacts. These crossings would be grade-separated under the LPA, Trench Option, and Hawthorne Option, thereby avoiding the need for light rail warning bells. The potential for LPA impacts is addressed in Chapter 4, Evaluation of Alternatives, of the Draft EIR.

Metro understands concerns regarding property values. However, under CEQA, economic impacts such as changes in property values are not considered environmental impacts. The Draft EIR focuses on physical environmental impacts and measures to mitigate them, as required by CEQA. To address questions and concerns on property values, Metro has prepared more information. See MR-14: Property Values and Impacts to Businesses. Also see MR-10: Changes to Community Character.

275-1 CEQA does not require an analysis of safety in terms of crime, as it is not an environmental issue, and therefore the Draft EIR does not make any conclusions regarding this topic. See MR-9: Light Rail Security.

Submission 276 Pedro Garcia

276-1 The commenter's opposition to the Metro ROW alignment and support for the Hawthorne Option is noted. See MR-1: Selection of Alternatives. Potential noise impacts are addressed in Section 3.6, Noise and Vibration, of the Draft EIR. See MR-3: Operational Noise Project Features and Mitigation Measures and MR-4: Potential Negative Health Effects Related to Noise, Vibration, and Air Quality. The Metro ROW alignments would include upgrades to existing freight crossings, allowing for the establishment of a Federal Railroad Administration quiet zone. This would eliminate routine freight train horn noise along the Metro ROW in the area. The LPA, Trench Option, and Hawthorne Option, would reduce operational noise impacts to less than significant with mitigation. This is because unlike the Elevated/At-Grade Alignment, these alignments would avoid need for light rail warning bells at at-grade crossings, as they would fully grade separate the light rail tracks.

The potential for LPA impacts is addressed in Chapter 4, Evaluation of Alternatives, of the Draft EIR.

The following commenter made their comment in Spanish. Its response is given first in Spanish. An English translation follows.

Propuesta 277 Luz Barrera

277-1 Se toma nota de la oposición del comentarista a la alineación en el derecho de paso de Metro. Consultar MR-1: "Selección de alternativas." Los posibles impactos del ruido se abordan en la Sección 3.6, "Ruidos y vibraciones", en el Borrador del Reporte de Impacto Ambiental. Consultar MR-3: "Elementos del proyecto relacionados con el ruido de las operaciones y medidas de mitigación." Las alineaciones en el derecho paso de Metro incluirían modernizaciones de los actuales cruces del tren de carga, lo cual permitiría que la Administración Federal de Ferrocarriles establezca una zona de silencio. Esto eliminaría el ruido rutinario causado por las bocinas del tren de carga a lo largo del derecho de paso de Metro en el área. Con medidas de mitigación, la alternativa preferida a nivel local, la opción de trinchera y la opción de Hawthorne evitarían los impactos significativos e inevitables del ruido causado por las actividades operativas de una alineación elevada/a nivel ya que eliminaría la necesidad de usar alarmas de alerta en los cruces del tren ligero porque estaría completamente separado a desnivel de la red vial. La posibilidad de impactos de la alternativa preferida a nivel local se aborda en el Capítulo 4, "Evaluación de las alternativas", en el Borrador del Reporte de Impacto Ambiental.

Submission 277 Luz Barrera

277-1 The commenter's opposition to the Metro ROW alignment is noted. See MR-1: Selection of Alternatives. Potential noise impacts are addressed in Section 3.6, Noise and Vibration, of the Draft EIR. See MR-3: Operational Noise Project Features and Mitigation Measures. The Metro ROW alignments would include upgrades to existing freight crossings, allowing for the establishment of a Federal Railroad Administration quiet zone. This would eliminate routine freight train horn noise along the Metro ROW in the area. With mitigation, the LPA, Trench Option, and Hawthorne Option, would avoid the significant an unavoidable operational noise impact associated with the Elevated/At-Grade Alignment, as they would eliminate the need for light rail crossing warning bells, as they would fully grade separate the light rail from roadways. The potential for LPA impacts is addressed in Chapter 4, Evaluation of Alternatives, of the Draft EIR.

Submission 278 Kelly Kolinske

278-1 The commenter's opposition to the Metro ROW alignment and support for the Hawthorne Option is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

278-2 The commenter's opposition to the project is noted. All comments have been shared with the Metro Board for their consideration.

Submission 279 Teresa Lopez

279-1 The commenter's opposition to the Metro ROW alignment and support for the Hawthorne Option is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 280 Marisa Cunanan

280-1 The commenter's opposition to the Metro ROW alignment and support for the Hawthorne Option is noted. See MR-1: Selection of Alternatives. Potential noise impacts are addressed in Section 3.6, Noise and Vibration, of the Draft EIR. See MR-3: Operational Noise Project Features and Mitigation Measures. The Metro ROW alignments would include upgrades to existing freight crossings, allowing for the establishment of a Federal Railroad Administration quiet zone. This would eliminate routine freight train horn noise along the Metro ROW in the area. With mitigation, the LPA, Trench Option, and Hawthorne Option, would avoid the significant and unavoidable operational noise impact associated with the Elevated/At-Grade Alignment, as they would not require light rail crossing warning bells because they would fully grade separate the light rail from all roadways. The potential for LPA impacts is addressed in Chapter 4, Evaluation of Alternatives, of the Draft EIR.

Submission 281 Ninnette Martinez

281-1 The commenter's opposition to the Metro ROW alignment and support for the Hawthorne Option is noted. See MR-1: Selection of Alternatives; MR-8: Light Rail and Freight Train Safety; and MR-9: Light Rail Security.

Submission 282 Isabel Fernandez

282-1 The commenter's opposition to the train is noted. See MR-1: Selection of Alternatives. Potential noise impacts are addressed in Section 3.6, Noise and Vibration, of the Draft EIR. See MR-3: Operational Noise Project Features and Mitigation Measures. The Metro ROW alignments would include upgrades to existing freight crossings, allowing for the establishment of a Federal Railroad Administration quiet zone. This would eliminate routine freight train horn noise along the Metro ROW in the area. With mitigation, the LPA, Trench Option, and Hawthorne Option, would avoid the significant and unavoidable operational noise impact associated with the Elevated/At-Grade Alignment because they would not require light rail crossing warning bells, as they would fully grade separate the light rail from all roadways. The potential for LPA impacts is addressed in Chapter 4, Evaluation of Alternatives, of the Draft EIR.

Submission 283 Darry

283-1 The commenter's opposition to the Metro ROW alignment and support for the Hawthorne Option is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

The following commenter made their comment in Spanish. Its response is given first in Spanish. An English translation follows.

Propuesta 284 Connie Santana

284-1 Se toma nota de la oposición del comentarista al proyecto. Consultar MR-1: "Selección de alternativas", MR-3: "Elementos del proyecto relacionados con el ruido de las operaciones y medidas de mitigación", MR-10: "Cambios en el carácter de la comunidad" y MR-12: "Acceso a los servicios de emergencia."

Submission 284 Connie Santana

284-1 The commenter's opposition to the project is noted. See MR-1: Selection of Alternatives, MR-3: Operational Noise Project Features and Mitigation Measures, MR-10: Changes to Community Character, and MR-12: Emergency Access.

Submission 285 Enrique Flores

285-1 The commenter's opposition to the Metro ROW alignment and support for the Hawthorne Option is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 286 Justin Huh

286-1 Metro understands the importance of maintaining a quiet environment for those who work night shifts, and Metro is committed to minimizing the noise impacts of the project. As described in Section 3.6, Noise and Vibration, of the Draft EIR, Metro would implement Mitigation Measures MM-NOI-2: Soundwalls and MM-NOI-3: Low Impact Frogs to reduce daytime and nighttime noise impacts at sensitive receptors along the alignment to less than significant levels with mitigation where feasible. In addition, the LPA and Trench Option significantly reduce noise impacts compared to the Elevated/At-Grade Alignment because they eliminate the at-grade crossings at 170th and 182nd Streets. By grade separating the light rail from all roadways, the LPA, Trench Option, and Hawthorne Option remove the need for audible warning at light rail crossings, such as routine train horns and crossing bells. As described in Chapter 4, Evaluation of Alternatives, of the Draft EIR and Chapter 2, Description of the Locally Preferred Alternative, of the Final EIR, operational noise impacts of the LPA would be reduced to less than significant levels with mitigation at all sensitive receptors.

Mitigation Measure MM-VIB-3: Pre- and Post-Construction Surveys requires contractors to document damage resulting from vibration impacts during construction, and repair them. In addition, as discussed in Section 3.8, Geology and Soils, of the Draft EIR, the project design process would include thorough site geotechnical investigations to ensure the stability of nearby structures. Per Project Feature PF-GEO-1: Metro Geotechnical Design Standards, site-specific geotechnical investigations would be conducted to address foundation and structural safety. The investigation would include engineering and construction recommendations to ensure surrounding structures are not damaged.

See MR-1: Selection of Alternatives; MR-3: Operational Noise Project Features and Mitigation Measures; MR-4: Potential Negative Health Effects Related to Noise, Vibration and Air Quality; and MR-10: Changes to Community Character.

286-2 The commenter's preference for the Hawthorne Option is noted. All comments have been shared with the Metro Board for their consideration.

286-3 The commenter's opposition to the project is noted. All comments have been shared with the Metro Board for their consideration. For clarification, the project is not configured as a subway.

Submission 287 Brandon Crockett

287-1 The commenter's opposition to the Metro ROW alignment and support for the Hawthorne Option is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 288 Kevin Crockett

288-1 The commenter's opposition to the Metro ROW alignment and support for the Hawthorne Option is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 289 Nilo Caraan

289-1 This comment is illegible. No response can be provided.

Submission 290 Mike Margiore

290-1 The commenter's opposition to the Metro ROW alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

290-2 Metro is committed to integrating safety into all Metro rail operations. The project would comply with relevant safety standards, including the California Manual on Uniform Traffic Control Devices, the California Department of Transportation Highway Design Manual, the Americans with Disabilities Act, and Metro's Grade Crossing Safety Policy. In addition, the LPA would be fully grade-separated from all roadways, thereby avoiding potential conflicts with pedestrians or cyclists. See MR-8: Light Rail and Freight Train Safety and MR-9: Light Rail Security.

290-3 The commenter's support for the Hawthorne Option is noted. All comments have been shared with the Metro Board for their consideration.

Submission 291 Alex Ochoa

291-1 The commenter's opposition to the Metro ROW alignment and support for the Hawthorne Option is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 292 Valeria Krocak

292-1 The commenter's opposition to the Metro ROW alignment and support for the Hawthorne Option is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 293 Cristian Montiel

293-1 The commenter's opposition to the Metro ROW alignment and support for the Hawthorne Option is noted. Potential noise impacts are addressed in Section 3.6, Noise and Vibration, of the Draft EIR. The LPA significantly reduces noise impacts compared to the Elevated/At-Grade Alignment because it eliminates the at-grade crossings at 170th and 182nd Streets, and thus eliminates the need for light rail crossing warning devices. The potential for LPA impacts is addressed in Chapter 4, Evaluation of Alternatives, of the Draft EIR and determines that operational noise impacts would be reduced to less than significant with mitigation (including the establishment of a quiet zone). The project would enable the local jurisdictions along the Metro ROW to obtain a "quiet zone" designation, which would reduce existing freight noise overall along the corridor, by eliminating freight horn soundings, which typically produces noise levels of up to 110 dBA (a-weighted decibel). See MR-1: Selection of Alternatives; MR-2: Operational Noise Analysis Methodology and Impact Thresholds; MR-3: Operational Noise Project Features and Mitigation Measures; and MR-4: Potential Negative Health Effects Related to Noise, Vibration, and Air Quality.

293-2 The commenter's opposition to the project is noted. All comments have been shared with the Metro Board for their consideration.

Submission 294 Charles Ellingson

294-1 The potential for noise and vibration impacts for the Elevated/At-Grade Alignment, the Trench option, and the Hawthorne Option are addressed in Section 3.6, Noise and Vibration, of the Draft EIR. The potential for LPA impacts is addressed in Chapter 4, Evaluation of Alternatives, of the Draft EIR. See MR-1: Selection of Alternatives; MR-2: Operational Noise Analysis Methodology and Impact Thresholds; MR-3: Operational Noise Project Features and Mitigation Measures; and MR-4: Potential Negative Health Effects Related to Noise, Vibration, and Air Quality; MR-5: Vibration Impact Types and Impact Thresholds; and MR-6: Vibration Analysis During Final Design.

Potential air quality impacts are addressed in Section 3.4, Air Quality, of the Draft EIR, including dust control during construction. Compliance with Project Features PF-AQ-1: Tier 4 Engine Standards and PF-AQ-2: Dust Control Best Practices would ensure that construction activities comply with South Coast Air Quality Management District and Metro standards controlling emissions and dust. Operationally, the light rail vehicles would be powered by electricity and would not produce localized emissions. Regional air quality would improve with implementation of the project due to a shift from passenger vehicles to light rail in the corridor.

Although some residents use the Metro ROW for recreational activities, this use is not authorized or compliant with freight safety standards. The project would add multi-use

recreational paths parallel to the rail tracks at several points along the alignment, which would improve the functionality of the space while ensuring public safety. See MR-10: Changes to Community Character.

Metro is committed to integrating safety into all Metro rail operations. The project would comply with relevant safety standards, including the California Manual on Uniform Traffic Control Devices, the California Department of Transportation Highway Design Manual, the Americans with Disabilities Act, and Metro's Grade Crossing Safety Policy. In addition, the LPA would be fully grade-separated from all roadways, thereby avoiding potential conflicts with pedestrians or cyclists. See MR-8: Light Rail and Freight Train Safety and MR-9: Light Rail Security. See MR-12: Emergency Access.

Submission 295 Chelsea Schreiber

295-1 Metro has undertaken extensive community outreach for potential transit service along the Metro ROW for well over a decade. Metro's outreach program also accommodates the needs of residents with limited English proficiency. Most recently, in advance of the Metro Board of Director's selection of the LPA in May 2024, Metro distributed 32,000 flyers to residents, property owners, and businesses within a one-mile radius of all alignments under study to notify the community of the LPA selection. Additionally, at the request of the City of Lawndale, Metro sent flyers to every resident within Lawndale. All outreach notifications are provided in both English and Spanish. Documentation on the outreach conducted during the environmental review process is available on the Metro project Dropbox, by visiting metro.net/clineext/#documents.

295-2 The commenter's opposition to the Metro ROW alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 296 Viet Truong

296-1 The commenter's support for the project is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

296-2 The commenter's support for the Hawthorne Option and opposition to the Trench Option is noted. All comments have been shared with the Metro Board for their consideration.

296-3 The Torrance Transit Center was selected as the terminus to facilitate regional connectivity through existing and planned bus services. While Metro assists in identifying potential First/Last Mile (FLM) improvements during the planning and design phases, the implementation of FLM elements falls under the jurisdiction of the local cities. If the project is approved, Metro would coordinate with the local jurisdictions to assist in First/Last Mile planning. Future opportunities to enhance access to key destinations such as the Del Amo Fashion Center may be considered through local transit planning efforts.

Submission 297 Michael Kim

297-1 See MR-8: Light Rail and Freight Train Safety. The freight incident noted in the comment was not on the Metro ROW.

Metro retains qualified civil and structural engineering professionals (both in-house and contracted consultants) who have extensive experience designing and implementing complex rail infrastructure projects. Metro also coordinates closely with BNSF Railway, which operates freight service on the line, to ensure that any design and construction involving freight infrastructure meets or exceeds applicable safety criteria. Any freight track segments affected by the project would be reconstructed in compliance with all applicable safety standards, including the Metro Rail Design Criteria (MRDC), California Public Utilities Commission (CPUC), and the Federal Rail Administration (FRA) standards. The project would not increase the frequency of freight operations on the Metro ROW. Metro also coordinates closely with BNSF Railway to ensure that any design and construction involving freight infrastructure meets or exceeds applicable safety criteria.

297-2 See response to Comment 297-1 and MR-8: Light Rail and Freight Train Safety. The project would not "squeeze" infrastructure into the corridor at the expense of safety. There is sufficient ROW to accommodate all necessary project elements, including light rail and freight tracks, protective barriers, and maintenance access, while meeting or exceeding safety clearance. Relocated freight tracks would also be reconstructed using modern materials and methods, improving overall safety and reliability relative to the aging infrastructure currently in place. Metro and its experienced design team would continue to work closely with BNSF and regulatory agencies to ensure that both light rail and freight rail components of the project are designed and constructed safely.

It is also important to clarify that the project is a light rail transit system, and not a commuter rail system like Metrolink. Unlike commuter rail systems, light rail vehicles are smaller, lighter, and operate at lower speeds, with more frequent stops. These operational characteristics inherently reduce risks and potential impacts compared to heavier rail systems. The project is designed to coexist safely alongside the freight line within the Metro ROW, with both systems operating independently.

297-3 The commenter's opposition to the Metro ROW alignment and support for the Hawthorne Option is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 298 Adam Korp

298-1 The commenter's support for the Hawthorne Option is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

298-2 Metro has undertaken extensive community outreach for potential transit service along the Metro ROW for over a decade. Most recently, in advance of the Metro Board of Director's selection of the LPA in May 2024, Metro distributed over 32,000 flyers to residents, property owners, and businesses within a one-mile radius of all alignments under study. Additionally, at the request of the City of Lawndale, Metro sent flyers to

every resident within Lawndale. Documentation on the outreach activities conducted during the environmental review process is available on the Metro project Dropbox, by visiting metro.net/clineext/#documents.

Metro understands concerns regarding property values. However, under CEQA, economic impacts such as changes in property values are not considered environmental impacts. The Draft EIR focuses on physical environmental impacts and measures to mitigate them, as required by CEQA. While change in community character does not constitute a significant impact under CEQA, Section 3.2, Land Use, and Section 3.3, Aesthetics, of the Draft EIR, analyze the project's potential to physically divide communities and to affect community character. As discussed in these sections of the Draft EIR, the project would result in less than significant impacts. The potential for LPA impacts is addressed in Chapter 4, Evaluation of Alternatives, of the Draft EIR. See MR-8: Light Rail and Freight Train Safety and MR-10: Changes to Community Character.

To address questions and concerns on property values, Metro has prepared more information. See MR-14: Property Values and Impacts to Businesses.

298-3 See MR-8: Light Rail and Freight Train Safety.

298-4 The presence of natural gas lines and petroleum pipelines, their potential impacts, and applicable regulatory requirements are addressed in Sections 3.9, Hazards and Hazardous Materials, and 3.11 Utilities and Service System, of the Draft EIR. Potential impacts of the LPA in this context are evaluated in Chapter 4, Evaluation of Alternatives, of the Draft EIR. In addition, Section 4.13, Corrections and Additions, of the Final EIR expands on the analysis in Section 3.9-4.2.1 of the Draft EIR by clarifying the protocols, construction techniques, regulations, and standards with which the project would comply. As detailed therein, these clarifications do not change the Draft EIR's conclusion that impacts related to oil and gas pipelines would be less than significant. See MR-7: Utility Relocation and Hazardous Materials Safety and MR-13: Soil Stability and Sinkholes for additional information. Where retaining walls are required, they would be designed and constructed in compliance with Project Feature PF-GEO-1: Metro Geotechnical Design Standards to ensure soil stability.

298-5 Impacts associated with soil stability are addressed in Section 3.8, Geology, Soils, and Paleontological Resources, of the Draft EIR. The potential for LPA impacts is addressed in Chapter 4, Evaluation of Alternatives, of the Draft EIR. See MR-13: Soil Stability and Sinkholes for additional information.

The Draft EIR includes a detailed evaluation of potential visual changes. Although it does not specifically isolate retaining walls as a visual element, the assessment uses the Federal Highway Administration's methodology for evaluating visual quality, based on three criteria: vividness (the memorability of the landscape), intactness (the extent to which the landscape is free from visual intrusions), and unity (the coherence and harmony of the landscape). As described in Section 3.3, Aesthetics of the Draft EIR, the project area is already highly urbanized, with a mix of residential, industrial, and commercial land uses, as well as the existing freight rail corridor. There are no designated scenic vistas or notable natural landscapes within the project's vicinity. Because the existing visual quality is

already rated low under all three criteria, permanent visual changes introduced by the project, including structural elements such as walls, would not degrade the visual environment and are considered neutral in effect.

With respect to potential shading, the creation of shade on private property, such as reduced sunlight in private yards, is generally not considered a significant environmental impact unless it affects public spaces or public resources such as parks, open space, or solar access. In addition, because the position of the sun changes throughout the day and year, any shading from the project features would be temporary and vary in duration, rather than causing continuous loss of light. Furthermore, the scale of retaining walls and soundwalls would generally be similar to the surrounding environment, and would therefore not generally be a substantial introduction of shade. Accordingly, shading of individual residences would not constitute a significant impact.

Impacts related to alterations of drainage patterns are addressed in Section 3.10, Hydrology and Water Quality, of the Draft EIR. Each alignment option would increase impervious surfaces but would include a low-impact development (LID) drainage system designed to retain most stormwater runoff within the project footprint. This system would meet the stormwater quality design volume requirements under the MS4 Permit established by the Los Angeles Regional Water Quality Control Board, minimizing flooding on-site and off-site, including in sumps, per Project Feature PF-HWQ-6: Low Impact Development (LID) BMPs per Regional Requirements. Additional runoff from the project would continue to be collected by storm drain facilities. Elevated portions of the alignment would include down drains. Discharge locations of underdrains installed along the alignment would be the same as existing discharge locations. The retainment of the majority of stormwater runoff within the project footprint and preservation of existing discharge locations reduces the potential for erosion and sedimentation to occur on or off site. Thus, the impact of the addition of impervious surfaces in a manner which would result in substantial erosion or siltation would be less than significant. Regarding stormwater management for the Trench Option, Project Feature PF-HWQ-7: Trench Operation Runoff Collection and Treatment would ensure proper collection, treatment, and rerouting of excess runoff, which would prevent flooding, reduce strain on sump pumps and help maintain natural water absorption.

As detailed in Chapter 4, Evaluation of Alternatives, of the Draft EIR, the LPA would have similar hydrology impacts to the Trench Option, with less than significant impacts. The project would comply with regional LID standards. For more information on Los Angeles Regional Water Quality Control Board (LARWQCB) requirements, see Section 3.10-1.2 of the Draft EIR.

298-6 Residences located along Ruxton Lane to the west of the Metro ROW are represented by Clusters E2 and E3 in Section 3.6, Noise and Vibration, of the Draft EIR. The multi-story building height was accounted for in the analysis and noise levels were predicted based on the third story of the building. The proposed source height (light rail tracks), receiver height (residences), and soundwall height and locations were all accounted for in the soundwall noise attenuation prediction per the Federal Transit Administration Noise and Vibration Impact Assessment Manual (2018). As shown on Page 3.6-52 of the Draft EIR, soundwalls are proposed along both the west and east side of the Metro ROW to mitigate

light rail noise. As shown in Appendix 3.6-B of the Draft EIR, Table 4, pages 27-28, impacts to the residential buildings cited by the commenter would be less than significant with mitigation. For the Metro ROW alignments, the project would enable local cities to establish Quiet Zones with FRA, as part of Project Feature PF-NV-1: Quiet Zone Equipment Installation and Mitigation Measure MM-NOI-4: Quiet Zone Establishment. See MR-3: Operational Noise Project Features and Mitigation Measures.

298-7 As explained on page 3.1-3 of the Draft EIR, traffic delay (often measured by level of service) is no longer permissible as a CEQA impact criterion and therefore this analysis and related topics are not addressed in the Draft EIR. See MR-11: Traffic Delay and Level-of-Service and the 2023 Transportation Detail Report, published concurrently with the Draft EIR, for a discussion of traffic conditions. LPA would be fully grade-separated from all roadways, and would not increase traffic congestion nor affect emergency access. See MR-11: Traffic Delay and Level-of-Service; the 2023 Transportation Detail Report, published concurrently with the Draft EIR; and MR-12: Emergency Access.

298-8 See response to Comment 298-2.

298-9 Cost is one of several factors Metro considers when evaluating alignment options, but it is not the sole determining factor. The Metro Board selected the Hybrid Alternative as the LPA based on a range of considerations, including each alternative's ability to meet the project objectives, minimize environmental impacts, and respond to community input. However, this selection does not constitute project approval. All alternatives, including the No Project Alternative, remain under consideration until the Final EIR is certified and the Metro Board takes final action on the project. Metro understands and takes seriously concerns related to potential environmental impacts of the project to adjacent land uses. These issues are evaluated in multiple sections of the Draft EIR, including Section 3.2 (Land Use), Section 3.3 (Aesthetics), and Section 3.6 (Noise and Vibration). See MR-1: Selection of Alternatives, MR-10: Changes to Community Character, and MR-21: Cost Estimates and Schedule.

298-10 See response to Comments 298-1 through 298-9.

Submission 299 Jennifer Dowd

299-1 The commenter's support for the Hawthorne Option is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

299-2 While change in community character does not constitute a significant impact under CEQA, Section 3.2, Land Use, and Section 3.3, Aesthetics, of the Draft EIR, analyze the project's potential to physically divide communities and to affect community character. As discussed in these sections of the Draft EIR, the project would result in less than significant impacts. The potential for LPA impacts is addressed in Chapter 4, Evaluation of Alternatives, of the Draft EIR. See MR-8: Light Rail and Freight Train Safety and MR-10: Changes to Community Character.

299-3 Metro is committed to integrating safety into all Metro rail operations. The project would comply with relevant safety standards, including the California Manual on Uniform Traffic Control Devices, the California Department of Transportation Highway Design Manual, the

Americans with Disabilities Act, and Metro's Grade Crossing Safety Policy. The incident referenced by the commenter occurred on the Metrolink Ventura County Line in a curved, single-track segment where a passenger train and freight train were operating on the same track and collided due to operator error. In contrast, the project is being designed so that the freight and light rail vehicles will not share tracks. The project proposes separate infrastructure to maintain physical and operational separation between the freight and light rail systems, eliminating the type of conflict that contributed to the Metrolink collision. Furthermore, the Public Safety Improvement Act of 2008, which was passed directly in response to the collision, requires positive train control (PTC), a system to be implemented ensuring vastly safer monitoring and controlling of train movements. As such, the conditions that led to that incident do not apply. See also MR-8: Light Rail and Freight Train Safety.

299-4 Residences located along Ruxton Lane to the west of the Metro ROW are represented by Clusters E2 and E3 in Section 3.6, Noise and Vibration, of the Draft EIR. The multi-story building height was accounted for in the analysis and noise levels were predicted based on the third story of the building. The proposed source height (light rail tracks), receiver height (residences), and soundwall height and locations were all accounted for in the soundwall noise attenuation prediction per the Federal Transit Administration Noise and Vibration Impact Assessment Manual (2018). As shown on Page 3.6-52 of the Draft EIR, soundwalls are proposed along both the west and east side of the Metro ROW to mitigate light rail noise. As shown in Appendix 3.6-B of the Draft EIR, Table 4, pages 27-28, impacts to the residential buildings cited by the commenter would be less than significant with mitigation. For the Metro ROW alignments, the project would enable local cities to establish Quiet Zones with FRA, as part of Project Feature PF-NV-1: Quiet Zone Equipment Installation and Mitigation Measure MM-NOI-4: Quiet Zone Establishment. See MR-3: Operational Noise Project Features and Mitigation Measures.

Impacts associated with soil stability are addressed in Section 3.8, Geology, Soils, and Paleontological Resources, of the Draft EIR. The project would incorporate Project Feature PF-GEO-1: Metro Geotechnical Design Standards, which ensures that the project complies with Metro's Geotechnical Design Standards as outlined in the Metro Rail Design Criteria. These standards require thorough geotechnical investigations to assess and address risks such as settlement, slope, instability, and lateral deformations, as well as detailed stability analyses of retaining walls and embankments and incorporation of reinforce or other design features as necessary to ensure long-term stability and safety. Retaining walls would be designed with drainage features to manage groundwater and prevent water accumulation behind the walls, thereby maintaining stability during various weather events, including heavy rains.

299-5 The commenter's support for the Hawthorne Option and opposition to the Metro ROW alignment is noted. All comments have been shared with the Metro Board for their consideration. See response to Comments 299-1 through 299-4.

Submission 300 Bryan Lee

300-1 See MR-16: Response to Lawndale and Redondo Beach Community Letter.

300-2 See MR-16: Response to Lawndale and Redondo Beach Community Letter.

300-3 See MR-16: Response to Lawndale and Redondo Beach Community Letter.

300-4 See MR-16: Response to Lawndale and Redondo Beach Community Letter.

300-5 See MR-16: Response to Lawndale and Redondo Beach Community Letter.

300-6 See MR-16: Response to Lawndale and Redondo Beach Community Letter.

300-7 See MR-16: Response to Lawndale and Redondo Beach Community Letter.

Submission 301 Blake Jung

301-1 See MR-16: Response to Lawndale and Redondo Beach Community Letter.

301-2 See MR-16: Response to Lawndale and Redondo Beach Community Letter.

301-3 See MR-16: Response to Lawndale and Redondo Beach Community Letter.

301-4 See MR-16: Response to Lawndale and Redondo Beach Community Letter.

301-5 See MR-16: Response to Lawndale and Redondo Beach Community Letter.

301-6 See MR-16: Response to Lawndale and Redondo Beach Community Letter.

301-7 See MR-16: Response to Lawndale and Redondo Beach Community Letter.

Submission 302 Alejandro

302-1 See MR-16: Response to Lawndale and Redondo Beach Community Letter.

302-2 See MR-16: Response to Lawndale and Redondo Beach Community Letter.

302-3 See MR-16: Response to Lawndale and Redondo Beach Community Letter.

302-4 See MR-16: Response to Lawndale and Redondo Beach Community Letter.

302-5 See MR-16: Response to Lawndale and Redondo Beach Community Letter.

302-6 See MR-16: Response to Lawndale and Redondo Beach Community Letter.

302-7 See MR-16: Response to Lawndale and Redondo Beach Community Letter.

Submission 303 Zein Obagi

303-1 The potential for noise impacts is addressed in Section 3.6, Noise and Vibration, of the Draft EIR. The commenter makes a general reference to residents sleeping with their windows open during nights when “South Bay air quality is good,” but does not explicitly state a concern that residents would no longer be able to do so due to increases in air

pollutant emissions or noise attributable to the project. Nonetheless, the commenter's reference to air quality is assumed to refer to air quality levels following project completion. Noise is also assumed to be among the commenter's concerns.

The noise standards used in the analysis in Section 3.6, Noise and Vibration, of the Draft EIR, are based on exterior noise levels, meaning that impacts were evaluated without assumed closed windows or air conditioning. As concluded in the Draft EIR, operational air quality impacts would be less than significant, and, with implementation of the proposed mitigation measures, operational noise impacts of each alignment option, other than the Elevated/At-Grade Alignment would be less than significant with mitigation. The potential for LPA impacts is addressed in Chapter 4, Evaluation of Alternatives, of the Draft EIR. See MR-3: Operational Noise Project Features and Mitigation Measures and MR-4: Potential Negative Health Effects Related to Noise, Vibration, and Air Quality.

It should be noted that as Metro's light rail does not result in emissions from the vehicles or other infrastructure along the tracks, there would be no change in air quality akin to that of freight rail emissions. Unlike freight rail, which is powered by diesel along this corridor, the proposed light rail would be powered by electricity with overhead contact wires, which do not emit air pollutants.

303-2 See response to Comment 303-1. The anticipated hours of operation are 4:00 a.m. one day to 1:00 a.m. the following day. System headways would be reduced during early morning (4:00 a.m. to 6:00 a.m.) and late-night hours (7:00 p.m. to 1:00 a.m.) to approximately 15 minutes. This would result in a reduced frequency of trains during these hours and reduced overall noise compared to peak-hour system headways of 5 minutes. Weekend system headways would be reduced compared to weekdays.

303-3 See response to Comment 303-1.

Submission 304 Yumiko Omatsu

304-1 Potential noise impacts are addressed in Section 3.6, Noise and Vibration, of the Draft EIR. The potential for LPA impacts is addressed in Chapter 4, Evaluation of Alternatives, of the Draft EIR. See MR-1: Selection of Alternatives; MR-2: Operational Noise Analysis Methodology and Impact Thresholds; MR-3: Operational Noise Project Features and Mitigation Measures; and MR-4: Potential Negative Health Effects Related to Noise, Vibration, and Air Quality; MR-5: Vibration Impact Types and Impact Thresholds; and MR-6: Vibration Analysis During Final Design.

Metro is committed to integrating safety into all Metro rail operations. The project would comply with relevant safety standards, including the California Manual on Uniform Traffic Control Devices, the California Department of Transportation Highway Design Manual, the Americans with Disabilities Act, and Metro's Grade Crossing Safety Policy. The LPA light rail guideway would be fully grade-separated from all roadways, thereby avoiding potential conflicts for pedestrians and emergency vehicles. See MR-8: Light Rail and Freight Train Safety, MR-9: Light Rail Security, MR-10: Changes to Community Character, and MR-12: Emergency Access.

304-2 The width of the Metro ROW varies throughout the corridor and thus the distances between rail tracks and property lines varies along the corridor. All light rail and freight tracks are designed according to Metro's design criteria with appropriate clearances, which includes space for maintenance. Existing utilities would be protected in place or relocated within the Metro ROW. See Appendix 2-A, Select Advanced Conceptual Engineering Drawings, of the Draft EIR and Appendix B, Select Advanced Conceptual Engineering Drawings - Locally Preferred Alternative, of the Final EIR for more details on design.

See MR-7: Utility Relocation and Hazardous Materials Safety.

Submission 305 Wayne Craig

305-1 The commenter's opposition to the ROW alignment is noted for the record. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Metro takes the safety and well-being of nearby communities very seriously. Every aspect of the project has been and would continue to be designed to address potential risks and ensure that construction and operation are conducted safely. The Draft EIR evaluates potential impacts on the environment in accordance with the CEQA Guidelines. Where potentially significant impacts are identified, the Draft EIR sets forth mitigation measures to reduce the potential impact to the extent feasible. In cases where mitigation would not reduce the impact to a less than significant level, such is disclosed in the Draft EIR. See Sections 3.4, Air Quality, Section 3.6., Noise and Vibration, 3.8, Geology and Soils, and Section 3.9, Hazardous Materials, of the Draft EIR. The potential for LPA impacts is addressed in Chapter 4, Evaluation of Alternatives, of the Draft EIR. Also see MR-3: Operational Noise Project Features and Mitigation Measures; MR-4: Potential Negative Health Effects Related to Noise, Vibration, and Air Quality; and MR-8: Light Rail and Freight Train Safety. With respect to issues related to ground settlement, see MR-13: Soil Stability and Sinkholes. See MR-7: Utility Relocation and Hazardous Materials Safety.

305-2 The commenter's support for an underground alignment on Hawthorne Boulevard is noted. A fully underground alignment along Hawthorne Boulevard has not been carried forward because it would be infeasible and would not substantially reduce any of the significant impacts of the alignment options and alternatives studied in the Draft EIR. Constructing a fully underground alignment would require extensive tunneling beneath an active, heavily developed corridor, leading to significant engineering challenges, major utility relocations, and substantial disruption to existing infrastructure. In addition, the cost of a fully underground alignment would far exceed available funding for the project. See MR-1: Selection of Alternatives.

305-3 The commenter's support for the Hawthorne Option is noted. All comments have been shared with the Metro Board for their consideration.

305-4 The comment regarding the benefits from the project and preference for the Hawthorne option is noted. All comments have been shared with the Metro Board for their consideration.

305-5 The commenter's opposition to the Metro ROW Alignment is noted. All comments have been shared with the Metro Board for their consideration.

305-6 The commenter's preference for a station at the South Bay Galleria is noted. All comments have been shared with the Metro Board for their consideration.

305-7 The 2023 Ridership Summary Report, published alongside the Draft EIR, shows that the project is expected to generate between 11,500 to 15,600 daily transit trips (boardings) daily. See MR-15: Metro Ridership Forecasting Methodology.

305-8 The commenter's support for Hawthorne Option is noted. All comments have been shared with the Metro Board for their consideration.

Submission 306 Velia Gomez

306-1 The commenter's support for the Hawthorne Option opposition to the Metro ROW alignment and is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

The commenter's opposition to the Metro ROW alignment is noted. Potential noise and vibration impacts are addressed in Section 3.6, Noise and Vibration, of the Draft EIR. The potential for LPA impacts is addressed in Chapter 4, Evaluation of Alternatives, of the Draft EIR. See MR-1: Selection of Alternatives; MR-2: Operational Noise Analysis Methodology and Impact Thresholds; MR-3: Operational Noise Project Features and Mitigation Measures; and MR-4: Potential Negative Health Effects Related to Noise, Vibration, and Air Quality; MR-5: Vibration Impact Types and Impact Thresholds; and MR-6: Vibration Analysis During Final Design.

Metro is committed to integrating safety into all Metro rail operations. The project would comply with relevant safety standards, including the California Manual on Uniform Traffic Control Devices, the California Department of Transportation Highway Design Manual, the Americans with Disabilities Act, and Metro's Grade Crossing Safety Policy. In addition, the LPA light rail guideway would be fully grade-separated from all roadways, thereby avoiding potential conflicts with pedestrians or cyclists. The LPA would be fully grade-separated from all roadways, thereby avoiding potential conflicts for pedestrians and emergency vehicles. See MR-8: Light Rail and Freight Train Safety and MR-9: Light Rail Security. See MR-12: Emergency Access.

Submission 307 Tony Galva

307-1 Metro understands concerns regarding property values. However, under CEQA, economic impacts such as changes in property values are not considered environmental impacts. The Draft EIR focuses on physical environmental impacts and measures to mitigate them, as required by CEQA. To address questions and concerns on property values, Metro has prepared more information. See MR-14: Property Values and Impacts to Businesses. Also see MR-10: Changes to Community Character.

Of the alignments studied in the Draft EIR, only the Elevated/At-Grade Alignment would result in a significant and unavoidable operational noise impact. Operational noise

impacts associated with the Trench Option, Hawthorne Option, and the LPA would be reduced to less than significant with mitigation. None of the alignments analyzed in the Draft EIR would result in a significant and unavoidable operational vibration impact.

307-2 The commenter's preference for the Hawthorne Option is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 308 Chelsea Schrieber

308-1 The commenter's opposition to the project is noted. Section 3.7, Biological Resources, of the Draft EIR, analyzes the removal and replacement of trees along the Metro ROW on sensitive biological resources. Impacts were determined to be less than significant with mitigation. As discussed in Section 3.7-3.5 of the Draft EIR, the Metro Tree Policy outlines Metro's commitment to protecting trees, when possible, or replacing trees removed as a result of Metro construction and maintenance. For non-heritage trees, the replacement ratio is two trees for every tree removed. This policy also prioritizes planting strategies that maximize the use of native species. The potential for LPA impacts is addressed in Chapter 4, Evaluation of Alternatives, of the Draft EIR.

308-2 The commenter's opposition to the Metro ROW alignment is noted. The Draft EIR evaluates potential impacts on the environment in accordance with CEQA and the CEQA Guidelines. Where potentially significant impacts are identified, the Draft EIR sets forth mitigation measures to reduce the potential impact to the extent feasible. In cases where mitigation would not reduce the impact to a level of less than significant, the impact is disclosed in the Draft EIR as significant and unavoidable. Potential noise impacts are addressed in Section 3.6, Noise and Vibration, of the Draft EIR. The potential for LPA impacts is addressed in Chapter 4, Evaluation of Alternatives, of the Draft EIR. See MR-1: Selection of Alternatives; MR-2: Operational Noise Analysis Methodology and Impact Thresholds; MR-3: Operational Noise Project Features and Mitigation Measures; and MR-4: Potential Negative Health Effects Related to Noise, Vibration, and Air Quality.

Air quality is addressed in Section 3.4, Air Quality, of the Draft EIR, including the consideration of dust control during construction. Compliance with Project Features PF-AQ-1: Tier 4 Engine Standards and PF-AQ-2: Dust Control Best Practices would ensure that construction activities comply with South Coast Air Quality Management District and Metro standards controlling emissions and dust. Operationally, the light rail vehicles would be powered by electricity and would not produce localized emissions. Regional air quality would improve with implementation of the project due to a shift from passenger vehicles to light rail in the corridor. The potential for LPA impacts is addressed in Chapter 4, Evaluation of Alternatives, of the Draft EIR.

The proposed project features and mitigation measures established by the Draft EIR are designed to protect the health and well-being of all residents, whether human or otherwise, to the greatest extent feasible.

308-3 While change in community character does not constitute a significant impact under CEQA, Section 3.2, Land Use, and Section 3.3, Aesthetics, of the Draft EIR, assess the project's potential to physically divide communities and to affect visual quality and

character. As discussed in these sections of the Draft EIR, the project would result in less than significant impacts. See MR-10: Changes to Community Character and MR-11: Traffic Delay and Level-of-Service.

308-4 The commenter's support for the Hawthorne Option is noted. All comments have been shared with the Metro Board for their consideration.

308-5 See response to Comment 308-3.

Submission 309 Ted Hofmann

309-1 The LPA would be fully grade-separated from all roadways and would not increase traffic congestion nor affect emergency access. See MR-11: Traffic Delay and Level-of-Service; the 2023 Transportation Detail Report, published concurrently with the Draft EIR; and MR-12: Emergency Access. In addition, as explained on page 3.1-3 of the Draft EIR, traffic delay (often measured by level of service) is no longer permissible as a CEQA impact criterion and therefore this analysis and related topics are not addressed in the Draft EIR. See MR-11: Traffic Delay and Level-of-Service and the 2023 Transportation Detail Report, published concurrently with the Draft EIR, for a discussion of traffic conditions.

309-2 As described in Section 3.1, Transportation, of the Draft EIR, Project Feature PF-T-1: Construction Traffic Management Plan requires contractors to develop a construction management traffic plan (CMTP), which would include coordination with local businesses and residents as well as relevant jurisdictions to manage access and the effects of temporary closures and identify reasonable accommodations or alternatives, which could include limiting construction hours, providing alternate routes or temporary easements, or other strategies. This would occur following the selection of an LPA and certification of the Final EIR, but prior to the initiation of localized construction activities. The potential for LPA impacts is addressed in Chapter 4, Evaluation of Alternatives, of the Draft EIR.

During construction of the project, traffic lanes on Hawthorne Boulevard may need to be closed up to and including full roadway closures but access to property must be maintained and would be addressed through the CTMP. Following completion, Hawthorne Boulevard would be restored to the same number of lanes throughout, with limited exceptions such as the loss of one of two northbound left turn lanes at the intersection with Artesia Boulevard. See response to Comment 309-1.

309-3 As described in Section 3.2, Land Use and Planning, of the Draft EIR, the project would comply with all applicable regulations and local ordinances governing construction activities to the extent feasible. Metro does not have the authority to set a construction moratorium for local agencies.

Submission 310 Ted Hofmann

310-1 See MR-10: Changes to Community Character. The proposed overhead contact system (OCS) is a standard and proven technology used in most light rail systems around the world. The OCS infrastructure would include poles and wires, which are necessary to provide power for the operation of the light rail vehicles. Although there are emerging alternatives to OCS technology, such as on-board batteries and ground-level power supply

systems, these technologies are currently not as reliable or cost-effective as OCS for large-scale, high-capacity transit systems. Additionally, implementing such technologies could require greater construction impacts and higher long-term maintenance costs, and they may not yet be suitable for Metro's operational needs.

As discussed in Section 3.3, Aesthetics, of the Draft EIR, the visual impacts of the project, including the OCS, were evaluated in terms of their compatibility with the existing visual baseline. The baseline conditions include an active transportation corridor with transportation-related infrastructure such as freight tracks, signal equipment, and utility poles, as well as existing overhead power transmission lines that are already part of the visual character of the Metro ROW and surrounding areas. Overall, the introduction of the OCS infrastructure would be consistent with the existing industrial and transportation-related visual elements within the corridor and would not substantially degrade the area's visual quality. Additionally, the OCS would be designed in accordance with Metro's design standards, which aim to integrate infrastructure into the surrounding environment and achieve a high quality of design. For a more detailed discussion, see the analysis of potential impacts to visual character and quality in Section 3.3-4.2 and associated visual simulations provided in the Draft EIR. The potential for LPA impacts is addressed in Chapter 4, Evaluation of Alternatives, of the Draft EIR.

310-2 The visual character analysis and before and after visual simulation of this portion of the Hawthorne Option near the I-405/Hawthorne Boulevard intersection can be found on page 3.3-99 and page 3.3-100 of the Draft EIR. See also response to Comment 310-1. See MR-1: Selection of Alternatives.

310-3 As discussed in Section 3.3, Aesthetics, the visual effects of the project, including the Hawthorne Option, were evaluated in terms of their compatibility with, and whether they would substantially degrade, the existing visual baseline.

Hawthorne Boulevard is located within a highly urbanized area characterized by transportation infrastructure, including a major north-south thoroughfare. The Draft EIR acknowledges that the elevated light rail tracks and light rail trains would introduce new visible vertical features that would block views to the northwest from motorists and pedestrians along Hawthorne Boulevard. However, the elevated features would not block any long-range views of prominent visual features, such as unique views of the mountains or coastline or protected views. The I-405 Bridge above Hawthorne Boulevard is an existing structure that already blocks north-facing views. The elevated structure would be consistent with other urban infrastructure in the area, such as the I-405 Freeway, existing utility lines, and Hawthorne Boulevard as a major transportation corridor.

See also response to Comment 310-2.

Submission 311 Ted Hofmann

311-1 Project Feature PF-US-1: Utility Identification and Coordination, described on page 3.11-10 of the Draft EIR would ensure proper utility identification and coordination to construction activities.

311-2 See MR-7: Utility Relocation and Hazardous Materials Safety.

Submission 312 Ted Hofmann

312-1 The Metro Board has the ability to select any project option or alternative described in the Draft EIR, including the No Build Alternative or High-Frequency Bus Alternative. See MR-1: Selection of Alternatives.

312-2 All public comments received during the environmental review process—from the initial Scoping period through the Draft EIR comment period—were shared with the Metro Board prior to its selection of the Hybrid Alternative as the LPA in May 2024. At that time, the Metro Board directed staff to proceed with preparation of the Final EIR, including responses to all public comments received on the Draft EIR with respect to any alignment. The Metro Board also directed staff to further refine anticipated costs and funding for the LPA.

The Metro Board will consider certification of the Final EIR and a decision on whether to approve the project in 2025. That decision would take into account the environmental analysis presented in the Final EIR as well as all public comments and feedback received throughout the environmental review process. No final decision on the alignment or project approval has been made.

Submission 314 George Gillen

314-1 Section 3.3, Visual and Aesthetics, of the Draft EIR analyzes visual impacts. Metro understands concerns regarding property values. However, under CEQA, economic impacts such as changes in property values are not considered environmental impacts. The Draft EIR focuses on physical environmental impacts and measures to mitigate them, as required by CEQA. The potential for changes in property value to indirectly cause such impacts is too speculative to evaluate meaningfully under CEQA. For instance, it is not reasonably foreseeable that property value changes alone would result in specific, identifiable physical alterations to homes or neighborhoods that would affect the aesthetic environment. The potential for LPA impacts is addressed in Chapter 4, Evaluation of Alternatives, of the Draft EIR. See MR-10: Changes to Community Character and MR-14: Property Values and Impacts to Businesses.

314-2 Metro is committed to integrating safety into all Metro rail operations. See MR-8: Light Rail and Freight Train Safety and MR-9: Light Rail Security.

314-3 See response to Comment 314-1. Also, as noted on page 3.3-71 and several other locations within the Draft EIR's aesthetics analysis. Metro's Tree Policy requires a minimum tree replacement ratio of 2:1 (or 4:1 if the tree is considered a heritage tree), and the planting of California-native or other drought-tolerant trees. Trees would also be replanted along the corridor to preserve and enhance the aesthetic character of the community.

Submission 315 Glen Brackenridge

315-1 The presence of natural gas lines and petroleum pipelines, their potential impacts, and applicable regulatory requirements are addressed in Sections 3.9, Hazards and Hazardous

Materials, and 3.11 Utilities and Service System, of the Draft EIR. Potential impacts of the LPA in this context are evaluated in Chapter 4, Evaluation of Alternatives, of the Draft EIR. In addition, Section 4.13, Corrections and Additions, of the Final EIR expands on the analysis in Section 3.9-4.2.1 of the Draft EIR by clarifying the protocols, construction techniques, regulations, and standards with which the project would comply. As detailed therein, these clarifications do not change the Draft EIR's conclusion that impacts related to oil and gas pipelines would be less than significant. With respect to the potential for explosions or fires, train operations occur above the ground at a safe distance from pipelines and, thus, do not directly create conditions for fires and explosions.

See MR-7: Utility Relocation and Hazardous Materials Safety and MR-13: Soil Stability and Sinkholes for additional information.

Submission 316 Glen Brackenridge

316-1 This project is not subject to NEPA as it requires no federal action. Should the project evolve in such a way that requires federal action, any necessary NEPA review would be explored at that time.

316-2 It is important to note that CEQA does not prohibit environmental impacts but requires that they be thoroughly studied and mitigated where feasible. In compliance with CEQA, the Draft EIR assessed potential impacts and identified mitigation measures and alternatives to reduce those impacts to less than significant levels where feasible. Noise impacts of the LPA during operation would be less than significant with mitigation. Under CEQA, an agency may approve a project with significant and unavoidable environmental impacts, provided the agency has adopted all feasible mitigation measures or alternatives to reduce those impacts and adopt a statement of overriding considerations finding that the project's benefits outweigh its significant and unavoidable environmental impacts (Pub. Resources Code, Section 21081(b); CEQA Guidelines, Section 15091-15093).

As explained on page 3.1-3 of the Draft EIR, traffic delay (often measured by level of service) is no longer permissible as a CEQA impact criterion and therefore this analysis and related topics are not addressed in the Draft EIR. See MR-11: Traffic Delay and Level-of-Service and the 2023 Transportation Detail Report, published concurrently with the Draft EIR, for a discussion of traffic conditions.

See MR-10: Changes to Community Character.

As noted on page 3.3-71 and several other locations within the Draft EIR's aesthetics analysis, Metro's Tree Policy requires a minimum tree replacement ratio of 2:1 (or 4:1 if the tree is considered a heritage tree), and the planting of California-native or other drought-tolerant trees. Trees would also be replanted along the corridor to preserve and enhance the aesthetic character of the community.

Potential noise impacts are addressed in Section 3.6, Noise and Vibration, of the Draft EIR. The potential for LPA impacts is addressed in Chapter 4, Evaluation of Alternatives, of the Draft EIR. See MR-2: Operational Noise Analysis Methodology and Impact Thresholds; MR-3: Operational Noise Project Features and Mitigation Measures; and MR-4: Potential Negative Health Effects Related to Noise, Vibration, and Air Quality.

316-3 As an operating rail transportation corridor, the Metro ROW is not specifically protected by any applicable local general plans, planning and zoning codes, or other regulations; the Metro ROW is not considered to be a "natural resource."

316-4 As discussed in, Section 3.7, Biological Resources, of the Draft EIR, 10 special-status wildlife species were determined to have potential to occur in the resource study area for the Metro ROW alignments. California gnatcatcher was identified as having a low potential to occur due to absence of suitable habitat. Therefore, the species is not expected to occur. This has been explicitly stated in Section 4.11, Corrections, and Additions, of this Final EIR. The potential for LPA impacts is addressed in Chapter 4, Evaluation of Alternatives, of the Draft EIR.

316-5 To clarify, all light rail alignments analyzed in the Draft EIR would comply with applicable environmental regulations. The commenter's preference for the Hawthorne Option is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 317 Glen Brackenridge

317-1 Metro has designed the project to avoid displacement of residents. . See the 2023 Real Estate Acquisition Report, published concurrently with the Draft EIR, and the 2025 Real Estate Acquisition Report, published concurrently with this Final EIR for more detailed information on proposed property acquisitions. In some areas along the Metro ROW, property owners have built out past their property lines and encroached into Metro ROW. An EIR is required to evaluate the potential physical environmental impacts of a proposed project. CEQA does not require an EIR to evaluate or disclose the legal process of property acquisition, including the use of eminent domain. Decisions regarding property acquisition, including whether and how eminent domain may be used, are made after project approval and are governed by separate legal procedures. These procedures ensure that property owners are afforded due process and just compensation, consistent with applicable state and federal laws. Accordingly, the topic of eminent domain is outside the scope of environmental review under CEQA. Also see MR-14: Property Values and Impacts to Businesses.

If property acquisition is required, Metro would comply with all applicable laws and procedures, including the California Relocation Assistance Act (Government Code Section 7260 et seq.) and Metro's real estate policies. Before making a final determination on the project, the Metro Board will review the Final EIR, including all public comments and responses, and consider a range of factors including environmental impacts, cost, benefits, and community feedback.

Submission 318 Glen Brackenridge

318-1 The commenter's support for the Hawthorne Option is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives. The LPA significantly reduces noise impacts compared to the Elevated/At-Grade Alignment because it eliminates the at-grade crossings at 170th and 182nd Streets. By grade separating the light rail from all roadways, the LPA removes the need for audible warning

at light rail crossings, such as routine train horns and crossing bells. As described in Chapter 4, Evaluation of Alternatives, of the Draft EIR and Chapter 2, Description of the Locally Preferred Alternative, of the Final EIR, the operational noise impacts of the LPA would be comparable to those of the Trench Option and would be less than significant with mitigation.

The noise analysis in the Draft EIR follows the Federal Transit Administration (FTA) Transit Noise and Vibration Impact Assessment Manual (2018), which specifies the use of 24-hour time-averaged noise levels to assess the ambient noise environment. These levels capture all sound sources, including the occasional freight train pass-by, as part of the existing baseline. The analysis also incorporates a 10-dBA (a-weighted decibel) penalty for all sound occurring during the nighttime hours (10:00 p.m. to 7:00 a.m.) to account for increased sensitivity to noise during these hours. The effect of the penalty is that in the calculation of 24-hour noise, any event that occurs during the nighttime hours, is equivalent to 10 of the same events during the daytime hours. This ensures the assessment reflects the potential for greater disturbance from nighttime noise events. See MR-2: Operational Noise Analysis Methodology and Impact Thresholds for information regarding the noise methodology.

Although noise from freight trains is loud and increases the 24-hour average noise levels, its infrequent occurrence during the day means that it does not dominate or skew the overall noise profile. Excluding the freight noise from the existing ambient noise conditions would not comply with FTA methodology and would misrepresent the true ambient noise environment. The 24-hour noise measurements include both periods when the freight is not operating and periods where freight is operating.

Existing noise conditions along Hawthorne Boulevard are shown on pages 3.6-25 and 3.6-26 of the Draft EIR (see noise monitoring locations 4, 6, 7, 8, 9, 11, 14, 15, 16, 19, 21, 22, 25 and 26). While Hawthorne Boulevard has higher ambient noise level due to traffic, residential neighborhoods near both alignments have comparable noise levels. (see page 3.6-23 for noise measured ambient noise levels at each noise monitoring location). See MR-2: Operational Noise Analysis Methodology and Impact Thresholds for information regarding the noise methodology.

Submission 319 Glen Brackenridge

319-1 As discussed in Section 3.2, Land Use and Planning, of the Draft EIR, the project would not physically divide a community because residents would still be able to cross the Metro ROW at all existing designated rail crossings located at Inglewood Avenue, Manhattan Beach Boulevard, 159th, 160th, 161st, 162nd, 170th, and 182nd Streets. Land uses would not be altered so as to isolate any one part of the community from the other. Although some residents use the Metro ROW for recreational activities or cross the tracks outside of designated crossings areas, this use is not authorized or compliant with freight safety standards.

The language quoted by the comment is from the threshold of significance that asks whether a project “would substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a *state scenic highway*”.

As discussed in Section 3.3-3.2 of the Draft EIR, the closest state-designated scenic highway is 10 miles away. Further, scenic resources are generally defined as significant natural or cultural features, such as trees designated as heritage trees or features located within a designated scenic vista. The Metro ROW itself is not a designated scenic resource. However, as discussed in Section 3.3-4.3 of the Draft EIR, a segment of the Metro ROW in Lawndale does provide a green buffer used recreationally by the community. While the project may alter the current visual character of the ROW, the design would integrate landscaping and other features to maintain compatibility with the community's urban and residential environment. Additionally, the project would include two multi-use recreational paths to enhance the pedestrian and bicycle connectivity, which would serve as new community amenities. The project would also provide high-quality landscaping, including replacement trees, in accordance with the Metro Tree Policy. The potential for LPA impacts is addressed in Chapter 4, Evaluation of Alternatives, of the Draft EIR. See MR-10: Changes to Community Character.

319-2 See response to Comment 319-1.

Submission 320 Glen Brackenridge

320-1 While change in community character does not constitute a significant impact under CEQA, Section 3.2, Land Use, and Section 3.3, Aesthetics, of the Draft EIR, analyzes the project's potential to physically divide communities and to affect visual quality and character. As discussed in these sections of the Draft EIR, the project would result in less than significant impacts. The LPA would be fully grade-separated from all roadways. Pedestrians would cross streets at-grade and avoid any conflicts with light rail trains. The potential for LPA impacts is addressed in Chapter 4, Evaluation of Alternatives, of the Draft EIR.

Submission 321 Glen Brackenridge

321-1 The light rail guideway under the LPA and the Trench Option would be fully grade-separated from all roadways, and would not increase traffic congestion nor affect emergency access. See MR-12: Emergency Access. For the Elevated/At-Grade Alignment, the frequency of the railroad crossing gate down time would increase relative to existing conditions, but it would not result in the permanent closure of emergency access. All homes and businesses on either side of the 182nd Street railroad crossing are accessible by alternate routes within ½ mile that are grade-separated crossings and therefore not affected by train frequency.

321-2 See response to Comment 321-1.

Submission 322 Glen Brackenridge

322-1 Cost for utility relocation of both public and private utilities was included in the total cost published in the 2023 Cost Estimates Summary for all alternatives and options. See MR-21: Cost Estimates and Schedule.

Submission 323 James Tucker

323-1 The commenter's support for the Trench Option is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

323-2 The potential for noise impacts is addressed in Section 3.6, Noise and Vibration, of the Draft EIR. The potential for LPA impacts is addressed in Chapter 4, Evaluation of Alternatives, of the Draft EIR. According to the Federal Transit Administration Transit Noise and Vibration Impact Assessment Manual (2018), light rail trains along an aerial guideway may generate slightly higher noise levels, compared to ground-level operations, with a +4 dBA adjustment applied in the analysis. This adjustment accounts for the increased noise due to the elevation and the lack of intervening structures to block sound. However, while elevated tracks could allow noise to carry further in some cases, the screening distance for potential noise impacts is 350 feet from the light rail line. Within this distance, all sensitive receptors have been fully assessed and mitigation applied where necessary to address potential impacts.

323-3 The commenter's preference for the Metro ROW alignment is noted. The project would include two new multi-purpose paths, which would provide new opportunities for outdoor activities and community enjoyment. For further information regarding multi-purpose path, see Chapter 2, Project Description, of the Draft EIR. Additionally, one of the project objectives is to provide First/Last Mile facilities to connect neighborhoods to station areas. Metro would continue to engage with the community to identify opportunities for improving station access and connectivity.

The Redondo Beach Transit Center Station would be adjacent to the city's Redondo Beach Transit Center, and would be connected via pedestrian pathways, ramps, and stairs. Metro has proposed a multi-use recreational path between Grant Avenue and 182nd Street that would provide access to the Redondo Beach Transit Center Station.

323-4 The project is designed to enhance regional access by linking the proposed light rail system with the existing bus network, ensuring convenient transfers for passengers, and improving overall mobility throughout the region. By extending light rail from our existing Redondo Beach (Marine) Station to the new Torrance Transit Center, the project would create new, direct connections between the regional transit network and local transit hubs, such as Redondo Beach Transit Center and Mary K. Giordano Regional Transit Center in Torrance.

Submission 324 Jamison Hughes

324-1 The commenter's opposition to the ROW alignment and Trench Option is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

324-2 The commenter's opposition to the project is noted. All comments have been shared with the Metro Board for their consideration. The project is intended to enhance mobility and provide improved transit options while minimizing potential impacts on the surrounding community. See MR-19: Project Benefits.

324-3 The commenter's concerns are noted. In the previous planning stages, stations were proposed in Lawndale, including as part of the 2018 Supplemental Alternatives Analysis, but at the request of Lawndale were removed from consideration.

The potential for impacts for the Elevated/At-Grade Alignment, the Trench option, and the Hawthorne Option are addressed in Section 3.6, Noise and Vibration, of the Draft EIR. The potential for LPA impacts is addressed Chapter 4, Evaluation of Alternatives, of the Draft EIR. Regarding construction vibration impacts, the Draft EIR identifies temporary vibration impacts related to structural damage and annoyance that could occur from certain activities. To address these impacts, Mitigation Measures MM-VIB-1: Vibration Control Plan, MM-VIB-2: Construction Equipment Location, and MM-VIB-3: Pre- and Post-Construction surveys, would be required. With implementation of these mitigation measures, potential vibration-related structural damage impacts of the LPA, Trench Option, and Hawthorne Option would be reduced to less than significant with mitigation. However, the Elevated/At-Grade Alignment would result in significant and unavoidable construction vibration-related damage impact, even with implementation of these measures. This is due to the need for pile driving to reconstruct the Grant Avenue Bridge, which is not required for the LPA, Trench Option, or Hawthorne Option.

The Draft EIR further discloses that the construction vibration annoyance impacts of each alignment studied would be significant and unavoidable. These annoyance impacts would be temporary and limited to periods when the most vibration intensive types of equipment (e.g., pile drivers and vibratory compactors), is in use, typically for a short duration near any given property. Unlike the LPA, Trench Option, and Hawthorne Option, construction of the related to both structural damage and vibration annoyance,

Regarding operational vibration impacts, those impacts were assessed in accordance with the Federal Transportation Administration (FTA) Transit Noise and Vibration Impact Assessment Manual (FTA, 2018), which is the industry standard for evaluating noise and vibration impacts from transit projects. This guidance provides a well-established and widely accepted framework for determining the potential effects of noise and vibration on sensitive receptors, including residential properties. Mitigation measures include MM-VIB-4: Low Impact Frogs, MM-VIB-5: Resilient Fasteners, and MM-VIB-6: Ballast Mats. Operational vibration annoyance impacts would be less than significant with mitigation for the project.

As discussed in Section 3.8, Geology and Soils, of the Draft EIR, the project design process would include thorough site geotechnical investigations to ensure the stability of nearby structures. Per Project Feature PF-GEO-1: Metro Geotechnical Design Standards, site-specific geotechnical investigations would be conducted to address foundation and structural safety. The investigation would include engineering and construction recommendations to ensure surrounding structures are not damaged.

See also MR-2: Operational Noise Analysis Methodology and Impact Thresholds, MR-3: Operational Noise Project Features and Mitigation Measures; MR-5: Vibration Impact Types and Impact Thresholds, MR-13: Soil Stability and Sinkholes.

324-4 The 2023 Ridership Summary Report, published alongside the Draft EIR, shows that the project is expected to generate between 11,500 to 15,600 daily transit trips (boardings). See MR-15: Metro Ridership Forecasting Methodology.

324-5 The commenter's opposition to using the Metro ROW for the project is noted. See MR-10: Changes to Community Character and MR-19: Project Benefits.

Submission 325 Jan Kurth

325-1 Although CEQA does not require a separate "Human Health Impact Study," the Draft EIR thoroughly evaluates the potential environmental conditions that could affect human health, including air quality, noise, and hazardous materials.

The commenter suggests that the Draft EIR only briefly mentions potential health effects. For instance, analysis for Section 3.4, Air Quality, of the Draft EIR provides a detailed discussion of the potential health effects of regulated pollutants, including carbon monoxide (CO), ozone (O_3), nitrogen dioxide (NO_2), particulate matter (PM), sulfur dioxide (SO_2), and lead (Pb). The analysis also evaluates toxic air contaminants (TACs), including diesel particulate matter, and applies health-based thresholds established by the South Coast Air Quality Management District (SCAQMD) to determine potential health risks. The findings conclude that the project's emissions would remain below levels associated with significant health impacts. Although construction of the Trench Option would result in a significant and unavoidable air quality impact due to unmitigable exceedances of the SCAQMD regional emissions threshold for NOx, this impact is primarily due to emissions from haul truck trips, which would travel more than 20 miles along the regional roadway network. As a result, most emissions would not occur in proximity to the communities near the construction area.

Similarly, analysis for Section 3.6, Noise and Vibration, of the Draft EIR discusses potential health effects of noise exposure, including stress-related impacts at sensitive receptors. The analysis also references federal occupational safety standards to demonstrate that operational noise levels would not reach thresholds associated with hearing loss. Mitigation measures have been incorporated where necessary to minimize noise-related effects.

Analysis for Section 3.9, Hazardous Materials, of the Draft EIR also provides a detailed evaluation of potential health risks associated with hazardous substances. The EIR identifies potential sources of hazardous materials within the project area, including contaminated sites, soil or groundwater contamination, and the potential for accidental hazardous material releases during construction. The analysis considers applicable regulatory frameworks, such as the Resource Conservation and Recovery Act (RCRA), the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), and California's hazardous waste regulations, which are designed to protect human health and the environment from exposure to hazardous substances. The EIR identifies potential exposure pathways, such as inhalation, ingestion, and dermal contact, and determines whether the project could result in conditions that pose a risk to public health. The findings conclude that, with compliance with existing regulations and adherence to the project features (PMs), which include requirements such as proper handling, storage, and

disposal of hazardous materials, the project would not result in significant health risks related to hazardous substances.

In addition to these analyses, analysis of health impacts is implicit in several of the topics addressed EIR including, the evaluation of hydrology and water quality, which considers potential deleterious effects to a region's water supplies and the analysis of geology and soil impacts, which considers a project's potential to result in injuries or death due to placement of new structures along active faults, within seismically active regions, or on unsuitable soil.

The comment incorrectly associates human health risk assessments with the energy analysis. There is no nexus between potential energy effects associated with implementing the project and effects on human health that would need to be studied in human health impact studies, including regarding exposures to hazardous materials. The distribution of energy, itself, does not directly produce emissions or hazardous materials on-site that could affect nearby residents. Instead, energy would be supplied through the electricity grid, where emissions from power generation are regulated by state and federal standards, including California's Renewable Portfolio Standard that minimizes public health risks from energy-related emissions through decreasing reliance on fossil fuels. Potential energy impacts are evaluated in Section 3.12, Energy, of the Draft EIR. The one mention of "human health" on Page 3.12-10 of the Draft EIR occurs in the context of the Metro Green Construction Policy, which aims to reduce emissions from construction activities through the use of cleaner equipment and practices. The potential for LPA impacts is addressed in Chapter 4, Evaluation of Alternatives, of the Draft EIR.

For additional information, see MR-4: Potential Negative Health Effects Related to Noise, Vibration, and Air Quality.

325-2 Under both the LPA and the Trench Option, the light rail guideway would be fully grade-separated from all roadways, and would not increase traffic congestion nor affect emergency access. See MR-12: Emergency Access. For the Elevated/At-Grade Alignment, the frequency of the railroad crossing gate down time would increase relative to existing conditions but it would not result in the permanent closure of emergency access. All homes and businesses on either side of the 182nd Street railroad crossing are accessible by alternate routes within ½ mile that are grade-separated crossings and therefore not affected by train frequency. See MR-12: Emergency Access.

The LPA construction duration is estimated to be approximately six years. See MR-21: Cost Estimates and Schedule for additional information. Although the total duration of project construction would be longer than five years, this accounts for construction of the entire alignment and sources would not be active in a specific location for five years or more. The LPA includes grade-separating the light rail at 170th Street and 182nd Street using two short trenches. The excavation required for the LPA would be significantly less extensive than that required for the Trench Option. Additionally, this excavation would occur during an early stage of construction and would be limited in duration. The localized emissions analysis provided in the Draft EIR, which focuses on emissions from sources located within the construction sites, determined that the Trench Option would not exceed the localized thresholds of significance. This would also apply to the LPA, including

the trench segment of the LPA, which would be smaller than that of the Trench Option. See Section 4.21, Corrections and Additions, of the Final EIR.

The Draft EIR determined that all construction activities required for the Trench Option, not just solely trenching, would have a significant and unavoidable impact with regards to air quality during construction. While the Metro Board selected the Hybrid Alternative as the LPA in May 2024, should the Trench Option be pursued, Mitigation Measure MM-AQ-1: Zero or Near Zero Emissions Haul Trucks, described in Section 3.4.5, would be implemented to reduce impacts to the extent feasible.

The EIR was prepared under state law and a federal conformity analysis is not required. Should the project seek federal funding, the project would be required to comply with all applicable federal requirements. See MR-4: Potential Negative Health Effects Related to Noise, Vibration, and Air Quality.

325-3 Metro is committed to integrating safety into all Metro rail operations. The project would comply with relevant safety standards, including the California Manual on Uniform Traffic Control Devices, the California Department of Transportation Highway Design Manual, the Americans with Disabilities Act, and Metro's Grade Crossing Safety Policy. In addition, the LPA light rail guideway would be fully grade-separated from all roadways, thereby avoiding potential conflicts with pedestrians or cyclists. See MR-12: Emergency Access.

325-4 While the Draft EIR acknowledges that increased noise levels could contribute to stress, it explains that light rail noise is unlikely to result in noise-induced hearing loss (see page 3.6-48). Similarly, construction noise, as discussed on page 3.6-34, is unlikely to cause hearing loss but may temporarily increase stress levels for nearby sensitive receptors. Metro has worked diligently to develop feasible and effective mitigation measures to address the potentially significant impacts of the project, including noise effects. See MR-2: Operational Noise Analysis Methodology and Impact Thresholds, MR-3: Operational Noise Project Features and Mitigation Measures, and MR-4: Potential Negative Health Effects Related to Noise, Vibration, and Air Quality.

325-5 See response to Comment 325-4. The link provided in the comment appears to refer to a private or personal email resource and is not accessible to Metro. If you intended to reference specific information or a publicly available document, please provide additional details or an accessible link so Metro can review and respond appropriately.

325-6 See MR-4: Potential Negative Health Effects Related to Noise, Vibration, and Air Quality.

325-7 Metro appreciates the time and effort that residents have put into participating in the public review process. Metro has conducted extensive outreach to ensure that community members are informed about the project and have opportunities to provide input. Metro is committed to planning and constructing projects and operating and maintaining facilities and vehicles in a manner that would protect human health and the environment. See response to Comment 325-5. Chapter 4, Evaluation of Alternatives, of the Draft EIR considers a reasonable range of project alternatives that are capable of achieving most of the project's basic objectives while avoiding or minimizing one or more of its significant environmental effects.

325-8 See response to Comment 325-5.

325-9 The commenter's support for the Hawthorne Option is noted. All comments have been shared with the Metro Board for their consideration.

Submission 326 Jerome Chang

326-1 The commenter's support for the Hawthorne Option is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

326-2 This commenter's preference for rapid buses is noted. All comments have been shared with the Metro Board for their consideration. The Draft EIR included evaluation of a High Frequency Bus Alternative. See MR-1: Selection of Alternatives.

Submission 327 Jose Jimenez

327-1 See MR-16: Response to Lawndale and Redondo Beach Community Letter.

327-2 See MR-16: Response to Lawndale and Redondo Beach Community Letter.

327-3 See MR-16: Response to Lawndale and Redondo Beach Community Letter.

327-4 See MR-16: Response to Lawndale and Redondo Beach Community Letter.

327-5 See MR-16: Response to Lawndale and Redondo Beach Community Letter.

327-6 See MR-16: Response to Lawndale and Redondo Beach Community Letter.

327-7 See MR-16: Response to Lawndale and Redondo Beach Community Letter.

Submission 328 Julie Young

328-1 The Draft EIR thoroughly analyzes the relocation of the existing freight tracks; this includes the analysis set forth in Section 3.9, Hazards and Hazardous Materials, which is based, in part, on the design in Appendix 2-A, Select ACE Drawings, of the Draft EIR. The locations and depths of existing utilities are included in and informs the conceptual engineering. See MR-7: Utility Relocation and Hazardous Materials Safety and MR-13: Soil Stability and Sinkholes for additional information.7: Utility Relocation and Hazardous Materials Safety and MR-13: Soil Stability and Sinkholes for additional information.

328-2 The Elevated/At-Grade Alignment would result in significant and unavoidable noise impacts at two sensitive receptors clusters near the at-grade crossing at 170th Street, where noise levels would exceed the Federal Transit Administration noise impact criteria, even after implementation of mitigation. For all other clusters, impacts would either be less than significant or less than significant with mitigation. By grade separating the light rail tracks, the LPA, Trench Option, and Hawthorne Option, remove the need for audible warnings, such as routine train horns and crossing bells. As described in Chapter 4, Evaluation of Alternatives, of the Draft EIR and Chapter 2, Description of the Locally Preferred Alternative, of the Final EIR, operational noise impacts of the LPA would be

comparable to those of the Trench Option and would be less than significant with mitigation. As described in Section 3.6, Noise and Vibration, of the Draft EIR, the operational noise impacts of the Hawthorne Option would also be less than significant with mitigation.

See also MR-10: Changes to Community Character.

328-3 This comment does not raise any significant environmental issues requiring a response. All comments have been shared with the Metro Board for their consideration.

328-4 The commenter's reluctance to use Metro transit services is noted. This comment does not raise any significant environmental issues requiring a response. All comments have been shared with the Metro Board for their consideration.

328-5 The commenter's support for the High-Frequency Bus Alternative is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 329 Lily Kua

329-1 The commenter's opposition to the project is noted. Metro is committed to integrating safety into all Metro rail operations. The project would comply with relevant safety standards, including the California Manual on Uniform Traffic Control Devices, the California Department of Transportation Highway Design Manual, the Americans with Disabilities Act, and Metro's Grade Crossing Safety Policy. In addition, the LPA, Trench Option, and Hawthorne Option would be fully grade-separated from all roadways, thereby avoiding potential conflicts with pedestrians or cyclists. See MR-8: Light Rail and Freight Train Safety.

329-2 The project under consideration is a light rail transit line, not a commuter train. Light rail vehicles are quieter, electrically powered trains that generate less noise and vibration compared to larger, diesel-powered commuter trains.

Section 3.4, Air Quality, of the Draft EIR, provides a detailed analysis of potential air quality impacts from light rail operations and construction. Section 3.6, Noise and Vibration, of the Draft EIR, provides a detailed analysis of potential noise and vibration impacts from light rail operations and construction. See MR-3: Operational Noise Project Features and Mitigation Measures and MR-4: Potential Negative Health Effects Related to Noise, Vibration, and Air Quality.

Mitigation Measure MM-VIB-3: Pre- and Post-Construction Surveys requires contractors to document damage resulting from vibration impacts during construction, and repair them. In addition, as discussed in Section 3.8, Geology and Soils, of the Draft EIR, the project design process would include thorough site geotechnical investigations to ensure the stability of nearby structures. Per Project Feature PF-GEO-1: Metro Geotechnical Design Standards, site-specific geotechnical investigations would be conducted to address foundation and structural safety. The investigation would include engineering and construction recommendations to ensure surrounding structures are not damaged.

Metro understands concerns regarding property values. However, under CEQA, economic impacts such as changes in property values are not considered environmental impacts. The Draft EIR focuses on physical environmental impacts and measures to mitigate them, as required by CEQA. To address questions and concerns on property values, Metro has prepared more information. See MR-14: Property Values and Impacts to Businesses.

329-3 Metro has carefully considered potential noise and vibration impacts. See response to Comment 329-2 and MR-10: Changes to Community Character.

329-4 The commenter's opposition to the project is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives and response to Comment 329-2.

Submission 330 Angeline Souza

330-1 Metro is committed to integrating safety into all Metro rail operations. The project would comply with relevant safety standards, including the California Manual on Uniform Traffic Control Devices, the California Department of Transportation Highway Design Manual, the Americans with Disabilities Act, and Metro's Grade Crossing Safety Policy. In addition, the LPA would be fully grade-separated from all roadways, thereby avoiding potential conflicts with pedestrians or cyclists. The See MR-8: Light Rail and Freight Train Safety. In addition, there is sufficient space for the proposed light rail and freight track within the Metro ROW. See Appendix 2-A, Select Advanced Conceptual Engineering Drawings, of the Draft EIR and Final EIR Appendix B, Select Advanced Conceptual Engineering Drawings - Locally Preferred Alternative, for more details.

330-2 See response to Comment 330-1, as well as MR-8: Light Rail and Freight Train Safety and MR-20: Proximity Impacts of Relocated Freight Tracks.

330-3 See response to Comment 330-1.

Submission 331 Bryan Henry

331-1 See MR-16: Response to Lawndale and Redondo Beach Community Letter.

331-2 See MR-16: Response to Lawndale and Redondo Beach Community Letter.

331-3 See MR-16: Response to Lawndale and Redondo Beach Community Letter.

331-4 See MR-16: Response to Lawndale and Redondo Beach Community Letter.

331-5 See MR-16: Response to Lawndale and Redondo Beach Community Letter.

331-6 See MR-16: Response to Lawndale and Redondo Beach Community Letter.

331-7 See MR-16: Response to Lawndale and Redondo Beach Community Letter.

Submission 332 Dana Icaza

332-1 The commenter's opposition to the Metro ROW alignment is noted. All comments have been shared with the Metro Board for their consideration. Section 3.1, Transportation, of the Draft EIR addresses potential transportation impacts, including pedestrian, bicycle, and vehicle conflicts. As described in Section 3.1-4.3 of the Draft EIR, the project would not substantially increase hazards due to incompatible uses, because it would incorporate signalized pedestrian crossings, physical barriers, warning systems, and clear signage. Furthermore, the Draft EIR's 170th/182nd Grade-Separated Light Rail Transit Alternative has been selected by the Metro Board as the LPA. Similar to the Trench Option and Hawthorne Option, the LPA would fully grade separate the light rail from all roadways, thereby eliminating the potential for conflicts associated with light rail crossings at grade. See MR-8: Light Rail and Freight Train Safety for additional information.

Submission 333 Doug Boswell

333-1 The commenter's support for the Hawthorne Option and opposition to the Metro ROW alignment and the Trench Option is noted. See MR-1: Selection of Alternatives.

Section 3.6, Noise and Vibration, of the Draft EIR analyzed impacts related to vibrations and concluded that the Metro ROW alignment would result in significant and unavoidable impacts related to vibration damage during construction. The same impacts, however, would be less than significant with mitigation for the Trench Option and Hawthorne Option. As explained in the Draft EIR, operational vibration impacts are generally associated with annoyance, not damage, and the analysis of building damage is typically limited to construction activity. The Draft EIR concluded that operational vibration impacts would be less than significant with mitigation for the Metro ROW alignments. Operational vibrations from the project are not expected to cause damage, as vibrations from light rail are unlikely to exceed damage thresholds for residential structures. The potential for LPA impacts is addressed in Chapter 4, Evaluation of Alternatives, of the Draft EIR. See MR-5: Vibration Impact Types and Impact Thresholds.

Submission 334 Dre Nicole Amundson

334-1 The commenter's opposition to the ROW alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

334-2 The comment does not raise significant environmental issues or address the adequacy of the Draft EIR and is noted for the record. All comments have been shared with the Metro Board for their consideration.

334-3 See MR-16: Response to Lawndale and Redondo Beach Community Letter.

334-4 See MR-16: Response to Lawndale and Redondo Beach Community Letter.

334-5 See MR-16: Response to Lawndale and Redondo Beach Community Letter.

334-6 See MR-16: Response to Lawndale and Redondo Beach Community Letter.

334-7 See MR-16: Response to Lawndale and Redondo Beach Community Letter.

334-8 See MR-16: Response to Lawndale and Redondo Beach Community Letter.

334-9 The commenter's support for the Hawthorne Option is noted. The selection of the LPA reflects a balance of community feedback, technical analysis, and cost considerations. However, no final decision has been made, and all alignment options and alternatives evaluated in the Draft EIR remain under consideration. The Metro Board will carefully review the Final EIR, including all public comments and responses, before deciding whether to certify the Final EIR and which project alignment, if any, to approve.

Submission 335 Janice Tanabe

335-1 Potential air quality impacts are addressed in Section 3.4, Air Quality, of the Draft EIR, including dust control during construction. Compliance with Project Features PF-AQ-1: Tier 4 Engine Standards and PF-AQ-2: Dust Control Best Practices would ensure that construction activities comply with South Coast Air Quality Management District and Metro standards controlling emissions and dust. Operationally, the light rail vehicles would be powered by electricity and would not produce localized emissions. The air quality analysis in the Draft EIR includes an assessment of localized emissions that would be generated from construction sites, which accounted for dust that would be generated. The localized air quality impacts were found to be less than significant when compared to the applicable South Coast Air Quality Management District (SCAQMD) thresholds, which were set at levels to prevent the occurrence of substantial dust concentrations reaching sensitive receptors that could cause adverse health effects. The localized impacts analysis used the most conservative receptor distance to be as protective as possible of the health of nearby residents. Regional air quality would improve with implementation of the project due to a shift from passenger vehicles to light rail in the corridor. The potential for LPA impacts is addressed in Chapter 4, Evaluation of Alternatives, of the Draft EIR. See MR-4: Potential Negative Health Effects Related to Noise, Vibration, and Air Quality.

Submission 336 Janice Tanabe

336-1 See MR-13: Soil Stability and Sinkholes and MR-8: Light Rail and Freight Train Safety. Additionally, regarding the potential for spills, the project would include Project Feature PF-HHM-1: Handling, Storage, and Transport of Hazardous Materials and Wastes, which requires the contractor to provide Metro with a hazardous waste and hazardous materials management plan. The plan must be completed in accordance with Metro contractor specifications and in compliance with the Clean Water Act Section 402 General Permit conditions and requirements for transport, labeling, containment, cover, and storage of hazardous materials during construction and operation. The Draft EIR concludes in Section 3.9-4.1 that the Elevated/At-Grade Alignment, Trench Option, and Hawthorne Option would not create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials during construction or operation, and a less than significant impact would occur.

Submission 337 John Schreiber

337-1 The commenter's support for the Hawthorne Option and opposition to the Metro ROW Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

337-2 Metro is committed to integrating safety into all Metro rail operations. See MR-8: Light Rail and Freight Train Safety.

See MR-7: Utility Relocation and Hazardous Materials Safety.

337-3 See response to Comment 337-2 and MR-8: Light Rail and Freight Train Safety.

337-4 See MR-7: Utility Relocation and Hazardous Materials Safety and MR-13: Soil Stability and Sinkholes.

5.5 RESPONSES TO INDIVIDUAL COMMENTS (SUBMISSION #338- #663)

Submission 338 Mark Nelson

338-1 CEQA does not require an analysis of safety in terms of crime, as it is not an environmental issue, and therefore the Draft EIR does not make any conclusions regarding this topic. See MR-9: Light Rail Security.

Submission 339 Mark Nelson

339-1 See response to Comment 338-1. It should also be noted that assertion that the presence of a Metro light rail line would attract criminal activity such as child abduction is not supported by evidence. The project does not include features that would increase such risks.

Submission 340 Mark Nelson

340-1 See response to Comment 338-1.

340-2 See response to Comment 338-1. The commenter provided several links to crimes that occurred on Metro's system. The comment has been provided to the Metro Board for their consideration; articles cited in the comment are included in the administrative record.

Submission 341 Michael Garlan

341-1 The LPA significantly reduces noise impacts compared to the Elevated/At-Grade Alignment because it eliminates the at-grade crossings at 170th and 182nd Streets. By grade separating the light rail from all roadways, the LPA, Trench Option, and Hawthorne Option avoid the need for audible warning at light rail crossings, such as routine train horns and crossing bells.

For freight operations, Project Feature PF-NV-1: Quiet Zone Equipment Installation and Mitigation Measure MM-NOI-4: Quiet Zone Establishment would be implemented to reduce freight noise at the 182nd crossing by eliminating routine train horn at that crossing.

Noise generated by light rail and relocated freight operations was included in the predicted noise levels for the Elevated/At-Grade Alignment and the Trench Option. The analysis found that even with grade-separated light rail crossing, the combined light rail and freight relocation noise would still affect clusters F2, F3, and F5. However, as shown on page 3.6-53 (Elevated/At-Grade Alignment) and page 3.6-67 (Trench Option) of the Draft EIR, these impacts would be reduced to less than significant with mitigation, including the establishment of a Federal Railroad Administration quiet zone. As described in Chapter 2, Description of the Locally Preferred Alternative, of the Final EIR, the LPAs operational noise impacts would be comparable to those of the Elevated/At-Grade Alignment and Trench Option, meaning operational noise impacts of the LPA would be less than significant with mitigation.

See MR-1: Selection of Alternatives; MR-2: Operational Noise Analysis Methodology and Impact Thresholds and MR-3: Operational Noise Project Features and Mitigation Measures.

341-2 See response to Comment 341-1. The potential for noise impacts is addressed in Section 3.6, Noise and Vibration, of Draft EIR. The noise standards used in the analysis in Section 3.6, Noise and Vibration, of the Draft EIR, are based on exterior noise levels, meaning that impacts were evaluated without assumed closed windows or air conditioning. The potential for LPA impacts is addressed in Chapter 4, Evaluation of Alternatives, of the Draft EIR. See MR-3: Operational Noise Project Features and Mitigation Measures and MR-4: Potential Negative Health Effects Related to Noise, Vibration, and Air Quality.

Submission 342 Michelle Hughes

342-1 The commenter's opposition to the Metro ROW alignment is noted. All comments have been shared with the Metro Board for their consideration. In the previous planning stages, stations were proposed in Lawndale as part of the 2018 Supplemental Alternatives Analysis, but at the request of Lawndale were removed from consideration. See MR-10: Changes to Community Character.

342-2 Metro recognizes that construction activities could be disruptive and has included project features and mitigation measures to minimize these disruptions and impacts as much as feasible. Construction noise impacts are analyzed in detail in Section 3.6, Noise and Vibration, of the Draft EIR. Although construction noise is expected to be temporary, it has been identified as a significant and unavoidable impact. To reduce these effects, Metro would implement Mitigation Measure MM-NOI-1: Noise Control Plan.

Regarding construction traffic impacts, as described in Section 3.1, Transportation, of the Draft EIR, the project includes Project Feature PF-T-1: Construction Traffic Management Plan, which would be submitted to the local cities and include measures manage construction-related traffic, such as establishing detour routes, providing advance notice and signage, maintaining access for residents, businesses, and emergency services, and scheduling deliveries and pick-ups during non-peak hours.

342-3 The LPA is similar to the Elevated/At-Grade Alignment, except the light rail would be grade-separated from all roadways, thereby avoiding the need for audible light rail warnings such as routine train horns and crossing bells. As described in Chapter 4, Evaluation of Alternatives, of the Draft EIR and Chapter 2, Description of the Locally Preferred Alternative, of the Final EIR, operational noise impacts of the LPA would be reduced to less than significant with mitigation at all sensitive receptors, including families with young children, elderly residents, and those working from home. See Section 3.6, Noise and Vibration, of the Draft EIR and MR-3: Operational Noise Project Features and Mitigation Measures.

342-4 As explained on page 3.1-3 of the Draft EIR, traffic delay (often measured by level of service) is no longer permissible as a CEQA impact criterion and therefore this analysis and related topics are not addressed in the Draft EIR. See MR-11: Traffic Delay and Level-of-

Service and the 2023 Transportation Detail Report, published concurrently with the Draft EIR, for a discussion of traffic conditions.

Metro understands concerns regarding property values. However, under CEQA, economic impacts such as changes in property values are not considered environmental impacts. The Draft EIR focuses on physical environmental impacts and measures to mitigate them, as required by CEQA. To address questions and concerns on property values, Metro has prepared more information. See MR-14: Property Values and Impacts to Businesses.

See response to Comments 342-2 and 342-3.

342-5 The commenter's opposition to the Metro ROW alignment is noted. All comments have been shared with the Metro Board for their consideration. See response to Comments 342-2 through 342-4.

Submission 343 Monique Negrete-Mitchell

343-1 Submission 98 includes the same comments from the same commenter. See responses to Comment Letter 98.

Submission 344 Morgan Schultz

344-1 The commenter's opposition to the Metro ROW alignment is noted. See MR-1: Selection of Alternatives.

Potential noise and vibration impacts are addressed in Section 3.6, Noise and Vibration, of the Draft EIR. The LPA significantly reduces noise impacts compared to the Elevated/At-Grade Alignment because it eliminates the at-grade crossings at 170th and 182nd Streets. By grade separating the light rail from all roadways, the LPA removes the need for audible warning at light rail crossings, such as routine train horns and crossing bells. The potential for LPA impacts is addressed in Chapter 4, Evaluation of Alternatives, of the Draft EIR. See MR-2: Operational Noise Analysis Methodology and Impact Thresholds; MR-3: Operational Noise Project Features and Mitigation Measures; and MR-4: Potential Negative Health Effects Related to Noise, Vibration, and Air Quality; MR-5: Vibration Impact Types and Impact Thresholds; and MR-6: Vibration Analysis During Final Design.

Potential air quality impacts are addressed in Section 3.4, Air Quality, of the Draft EIR. Compliance with Project Features PF-AQ-1: Tier 4 Engine Standards and PF-AQ-2: Dust Control Best Practices would ensure that construction activities comply with South Coast Air Quality Management District and Metro standards controlling emissions and dust. Operationally, the light rail vehicles would be powered by electricity and would not produce localized emissions. Regional air quality would improve with implementation of the project due to a shift from passenger vehicles to light rail in the corridor.

Potential water quality impacts are addressed in Section 3.10, Hydrology and Water Quality, of the Draft EIR. The project would not result in significant impacts on water quality.

See MR-19: Project Benefits for additional information regarding Metro's commitment to equity. Metro is committed to integrating safety into all Metro rail operations. See MR-8: Light Rail and Freight Train Safety and MR-9: Light Rail Security.

344-2 See MR-10: Changes to Community Character and MR-19: Project Benefits.

344-3 Metro is committed to equity and would continue to prepare inclusive outreach and engagement strategies. See MR-4: Potential Negative Health Effects Related to Noise, Vibration, and Air Quality, MR-13: Soil Stability and Sinkholes and response to Comment 344-1, and MR-20: Proximity Impacts of Relocated Freight Tracks.

344-4 As explained on page 3.1-3 of the Draft EIR, traffic delay (often measured by level of service) is no longer permissible as a CEQA impact criterion and therefore this analysis and related topics are not addressed in the Draft EIR. See MR-11: Traffic Delay and Level-of-Service and the 2023 Transportation Detail Report, published concurrently with the Draft EIR, for a discussion of traffic conditions. See response to Comment 344-1.

344-5 See MR-8: Light Rail and Freight Train Safety. As described in Chapter 2, Project Description, of the Draft EIR, the entire light rail guideway would be enclosed by physical barriers, such as fencing or soundwalls, or a combination of both, to prevent unauthorized access. While these barriers are primarily intended to restrict human intrusion, they would also serve to deter or prevent land animals from entering the guideway. In many areas, the existing fencing has been breached, and would be repaired under the project, which would limit unauthorized access into the Metro ROW relative to existing conditions.

344-6 The commenter's opposition to the Metro ROW alignment is noted. All comments have been shared with the Metro Board for their consideration. The Draft EIR does not analyze a "Torrance Boulevard Option," but rather an option on Hawthorne Boulevard.

Submission 345 Paul Miller

345-1 The commenter's support for the Metro ROW alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

345-2 The commenter's opposition to the Hawthorne Option is noted. To clarify, the Hawthorne Option would not result in the widening of Hawthorne Boulevard. However, no additional bike path or pedestrian improvements are proposed for the Hawthorne Option. As noted in the comment, construction for the Hawthorne Option would take longer than alignments using the Metro ROW. Potential greenhouse gas emission impacts are addressed in Section 3.5, Greenhouse Gas Emissions, of the Draft EIR. The potential for LPA impacts is addressed in Chapter 4, Evaluation of Alternatives, of the Draft EIR. See MR-21: Cost Estimates and Schedule.

345-3 As explained on page 3.1-3 of the Draft EIR, traffic delay (often measured by level of service) is no longer permissible as a CEQA impact criterion and therefore this analysis and related topics are not addressed in the Draft EIR. See MR-11: Traffic Delay and Level-of-Service and the 2023 Transportation Detail Report, published concurrently with the Draft EIR, for a discussion of traffic conditions.

The Draft EIR analyzes the long-term air quality effects of operating the Hawthorne Option and concludes that it would result in a net decrease in regional air pollutant emissions, as passenger vehicle trips would be displaced by the new light rail line. Table 3.4-20 of the Draft EIR summarizes these reductions.

Regarding vehicle idling, the primary pollutant of concern related to idling is CO. CO concentrations in the South Coast Air Basin have been well below federal and state standards for over two decades and the region has been designated as attainment/maintenance of the CO standards since 2007. Regarding CO "hot spots," Caltrans developed a methodology, the Transportation Project-Level Carbon Monoxide Protocol (CO Protocol) (Caltrans, 2010; available at https://dot.ca.gov/-/media/dot-media/programs/environmental-analysis/documents/env/co-protocol-searchable-a11y.pdf) for assessing CO hot spots at intersections. According to the CO Protocol, a detailed CO hot-spot analysis is not required unless background CO concentrations, traffic volumes, or other conditions approach those in existence in 2003, when CO attainment was demonstrated. For the Hawthorne Option, these conditions would not be met due to the following:

> Lower background CO concentrations: Current maximum 1- and 8-hour CO concentrations (1.8 and 1.5 ppm, respectively) are substantially below the levels observed in 2003 during the attainment demonstration (10.8 ppm and 9.9 ppm respectively). Compare Draft EIR Table 3.4-13 with Table 4-4 of the 2003 Air Quality Management Plan (AQMP) Attainment Demonstration.

> Lower traffic volumes: Traffic volumes at intersections in the project area do not exceed 10,000 vehicles per hour, which is well below the peak modeled volume of 10,601 vehicles per hour used in the attainment demonstration.

> Improved vehicle emissions technology: Since 2003, advancements in vehicle emission controls have significantly reduced CO emissions, further lowering the potential for hot-spot formation.

> Comparable modeling protocols: The CO Protocol requires receptor locations to be modeled at least three meters (10 feet) from the roadway edge. The project's receptor locations meet or exceed this distance, ensuring conditions are consistent with or less impactful than those evaluated in the attainment demonstration.

Because CO concentrations, traffic volumes, and vehicle emissions technology have improved significantly since the attainment demonstration, there is no potential for the project to exceed the CO concentration thresholds set by the CO Protocol. Therefore, a detailed CO hot-spot analysis was not required, and localized operational air quality impacts related to vehicle idling are not anticipated along Hawthorne Boulevard if the Hawthorne Option is implemented. The removal of the landscape buffer would not result in elevated CO concentrations reaching nearby residents based on the factors discussed above.

In 2022, Metro adopted a Metro Tree Policy which outlines Metro's commitment to protecting trees, when possible, or replacing trees removed as a result of Metro construction and maintenance. For non-heritage trees, the policy requires a replacement

ratio of two trees for every tree removed. As described in the 2023 Urban Design Report, published concurrently with the Draft EIR, should the Hawthorne Option be pursued, south of Artesia Boulevard, the center median and landscaping would be maintained, with vertical columns installed the median where needed.

The project, including the Hawthorne Option, would result in greater accessibility to public transportation, thus a reduction of on-road vehicle trips and vehicle miles traveled. See Sections 3.4, Air Quality, and 3.5, Greenhouse Gas Emissions, of the Draft EIR.

345-4 During construction, some lanes would need to be temporarily closed on Hawthorne Boulevard. However, as described in Section 3.1, Transportation, of the Draft EIR, Project Feature PF-T-1: Construction Traffic Management Plan requires contractors to develop a construction management traffic plan. Metro and its contractors would coordinate with local businesses and residents as well as relevant jurisdictions to manage access and the effects of temporary closures and identify reasonable accommodations or alternatives, which could include limiting construction hours, providing alternate routes or temporary easements, or other strategies. These are identified as part of the preliminary engineering work and addressed in the development of the Construction Traffic Management Plan

345-5 See response to Comment 343-3.

345-6 The commenter's support for the Metro ROW alignment is noted. The LPA provides grade separations for all light rail crossings to eliminate light rail bell use. It also includes "quiet zone ready" improvements to existing freight rail, such as the elimination of freight horns. Crossing signal bells would continue to generate a minimum noise level of 75 dBA (a-weighted decibel) at 10 feet per American Railway Engineering and Maintenance of Way requirements.

345-7 See response to Comments 345-1 through 345-6.

Submission 346 Ray Hollar

346-1 Under CEQA, potential economic effects including residential real estate would not constitute an effect to the physical environment and therefore do not need to be analyzed. The Draft EIR uses land use classifications in several analyses, collected from the cities' general plans, which include categories such as commercial businesses and residential housing. The analysis typically focuses on impacts to sensitive land uses, and specific business types were not considered.

346-2 See response to Comment 346-1.

346-3 See response to Comments 346-1. Despite residential rental properties functioning as sources of income, they are generally classified based on their zoning designation rather than their function as a business. As noted in the comment, much of Lawndale is zoned R-2, which is a residential zoning designation. Under this zoning, residential properties are considered residential use, not commercial businesses. Local zoning ordinances are legally binding and dictate the permissible uses of a property. The Draft EIR evaluates potential impacts to residential areas, including rental properties, under the appropriate

environmental topics such as noise, air quality, and construction impacts, and includes mitigation measures where applicable.

Commercial businesses would not be compensated during construction unless they are entitled to compensation under federal and state laws governing property acquisition and regulatory takings. Metro would continue to coordinate with affected parties to minimize disruptions wherever feasible.

Submission 347 Ray Hollar

347-1 Metro understands concerns regarding property values. However, under CEQA, economic impacts such as changes in property values are not considered environmental impacts. The Draft EIR focuses on physical environmental impacts and measures to mitigate them, as required by CEQA. To address questions and concerns on property values, Metro has prepared more information. See MR-14: Property Values and Impacts to Businesses, which discusses studies regarding the effects of nearby light rail stations on property values.

Submission 348 George Gillen

348-1 Consistent with the standard approach for EIRs, which are prepared pursuant to the requirements of the CEQA Guidelines, the Draft EIR evaluates potential impacts on the physical environment in accordance with the standards of significance established by the CEQA Guidelines Appendix G environmental checklist. Such should be noted by the commenter, as specific references to effects on physical human health are primarily limited in CEQA Guidelines Appendix G to Section III, Air Quality (question 'c') and Section IX, Hazards and Hazardous Materials (questions 'a,' 'b,' and 'c'). As such, consistent with Appendix G of the CEQA Guidelines, the Draft EIR explicitly evaluates the potential for the project to result in impacts on physical human health in Section 3.4, Air Quality, and Section 3.9, Hazards and Hazardous Materials, as well as, to a limited extent, in Section 3.11, Utilities and Service Systems (see Section 3.11.1.1 for an analysis on disposal of contaminated soils). These analyses assess potential for interaction with hazardous materials during construction and operation, and any related impacts, including cumulative impacts, are fully disclosed and addressed. Furthermore, although specific references to effects on physical human health are primarily limited to Sections III and IX of Appendix G, it is important to also note that several environmental issue areas required for analysis under CEQA also relate to human health. For example, analysis of noise-level increases generated by a project evaluates potential impacts on sensitive noise receptors, which accounts for the mental strain a project's noise effects has on residents and/or those at schools, hospitals, places of worship, and outdoor recreation areas in the project's vicinity. The evaluation of hydrology and water quality effects considers potential deleterious effects to a region's water supplies, including drinking water, which, in turn, accounts for effects to human health. Further, analysis of geology and soil impacts considers a project's potential to result in injuries or death due to placement of new structures along active faults, within seismically active regions, or on unsuitable soil. Analyses of the foregoing potential impacts, among others, are provided in the applicable technical sections of the Draft EIR. As such, the Draft EIR adequately analyzes the potential for the project to substantially affect human health, both directly and indirectly.

Additionally, the comment incorrectly associates human health risk assessments with the energy analysis. There is no nexus between potential energy effects associated with implementing the project and effects on human health that would need to be studied in human health impact studies, including regarding exposures to hazardous materials. The distribution of energy itself does not directly produce emissions or hazardous materials on-site that could affect nearby residents. Instead, energy would be supplied through the electricity grid, where emissions from power generation are regulated by state and federal standards, including California's Renewable Portfolio Standard that minimizes public health risks from energy-related emissions through decreasing reliance on fossil fuels. Potential energy impacts are evaluated in Section 3.12, Energy, of the Draft EIR. The one mention of "human health" on Page 3.12-10 of the Draft EIR occurs in the context of the Metro Green Construction Policy, which aims to reduce emissions from construction activities through the use of cleaner equipment and practices.

348-2 This comment is duplicative of Comment 325-1. See responses to Comments 325-1 and 348-1.

348-3 The potential for LPA impacts is addressed in Chapter 4, Evaluation of Alternatives, of the Draft EIR. The LPA and the Trench Option would be fully grade-separated from all roadways, and would not increase traffic congestion nor affect emergency access. See MR-12: Emergency Access. For the Elevated/At-Grade Alignment, the frequency of the railroad crossing gate down time would increase relative to existing conditions, but it would not result in the permanent closure of emergency access. All homes and businesses on either side of the 182nd Street railroad crossing are accessible by alternate routes within a half mile that are grade-separated crossings and therefore not affected by train frequency.

The LPA construction duration is estimated to be six years. See MR-21: Cost Estimates and Schedule for additional information. The LPA includes grade separating the light rail at 170th Street and 182nd Street using two short trenches. The excavation required for the LPA would be significantly less extensive than that required for the Trench Option. Additionally, this excavation would occur during an early stage of construction and would be limited in duration. The localized emissions analysis provided in the Draft EIR, which focuses on emissions from sources located within the construction sites, determined that air quality impacts would be less than significant. See Section 4.21, Corrections and Additions, of the Final EIR for more details on the LPA construction emissions.

The Draft EIR determined that all construction activities required for the Trench Option, not just solely trenching, would have a significant and unavoidable impact with regards to air quality during construction. While the Metro Board selected the Hybrid Alternative as the LPA in May 2024, should the Trench Option be pursued, Mitigation Measure MM-AQ-1: Zero or Near Zero Emissions Haul Trucks, described in Section 3.4.5, would be implemented to reduce impacts to the extent feasible.

Regarding the duration of construction activities, the United States Environmental Protection Agency (USEPA) conformity rule requires that construction emissions persisting for longer than five years at a particular location be fully analyzed. The Draft EIR discloses a comprehensive analysis of the emissions that would be generated during construction of

the project in accordance with CEQA requirements. Furthermore, although the total duration of project construction would be longer than five years, this accounts for construction of the entire alignment and sources would not be active in a specific location for five years or more.

348-4 Metro has worked diligently to develop feasible and effective mitigation measures to address the potentially significant impacts of the project, including noise effects. See MR-2: Operational Noise Analysis Methodology and Impact Thresholds, MR-3: Operational Noise Project Features and Mitigation Measures, and MR-4: Potential Negative Health Effects Related to Noise, Vibration, and Air Quality.

348-5 See response to Comment 348-4. The link provided in the comment appears to refer to a private or personal email resource and is not accessible to Metro. If you intended to reference specific information or a publicly available document, please provide additional details or an accessible link so Metro can review and respond appropriately.

348-6 Metro is committed to planning and constructing projects and operating and maintaining facilities and vehicles in a manner that would protect human health and the environment. See Response to Comment 348-1.

348-7 See response to Comment 348-6.

348-8 See response to Comment 348-4. Chapter 4, Evaluation of Alternatives, of the Draft EIR considers a reasonable range of project alternatives that are capable of achieving most of the project's basic objectives while avoiding or minimizing one or more of its environmental effects.

348-9 The commenter's support for the Hawthorne Option is noted. All comments have been shared with the Metro Board for their consideration.

Submission 349 Roy Bolling

349-1 Potential lighting impacts are discussed in Section 3.3, Aesthetics, of the Draft EIR. As stated in Section 3.3-2.4, Project Feature PF-AES-2: Metro Design Standards would require all lighting be compliant with Metro Design Standards. The lighting would also comply with applicable lighting regulations, if any, that would be verified during the permitting process relative to each jurisdiction the project traverses, and would be hooded, angled away from adjacent land uses. Lighting industry standards and best practices for transit project lighting in light-sensitive or residential areas would be followed, in compliance with Metro design Standards.

349-2 As indicated by the comment, Section 3.6. Noise and Vibration, of the Draft EIR, discloses that each alignment option would result in potentially significant construction-related noise and vibration annoyance and vibration damage impacts. To address these impacts, the project would implement Mitigation Measures MM NOI-1: Noise Control Plan, MM-VIB-1: Vibration Control Plan, MM-VIB-2: Construction Equipment Location, and MM-VIB-3: Pre- and Post- Construction Surveys. While implementation of these measures would reduce the construction noise and vibration impacts to the maximum extent feasible, some noise and vibration impacts during construction would remain significant and

unavoidable. These impacts would be temporary and would cease upon the completion of construction activities. Of the alignment options studied, only the Elevated/At-Grade Alignment would result in a significant and unavoidable vibration damage impact.

For operational noise, the project includes Mitigation Measure MM-NOI-2: Soundwalls to reduce noise impacts to a less than significant level with mitigation. For the Metro ROW alignments, the project would enable local cities to establish Quiet Zones with the Federal Railroad Administration, as part of Project Feature PF-NV-1: Quiet Zone Equipment Installation and Mitigation Measure MM-NOI-4: Quiet Zone Establishment. See MR-3: Operational Noise Project Features and Mitigation Measures, MR-5: Vibration Impact Types and Impact Thresholds, and MR-6: Vibration Analysis During Final Design. With respect to operational vibration impacts, as detailed on pages 3.6-105 through 3.6-109, with mitigation, operational vibration levels would not exceed the thresholds that could cause structural damage to buildings, including heavily cantilevered structures.

It is important to clarify that there is no "passing" of an EIR. Instead, the Metro Board of Directors will consider the Final EIR, including all environmental impacts identified and the comments received during the Draft EIR's public comment period, and decide whether to approve the project. If the Board approves the project, it must also adopt all feasible mitigation measures necessary to reduce the significant environmental impacts identified in the EIR. If any significant impacts cannot be reduced to less than significant levels through feasible mitigation measures or alternatives, the Metro Board would need to adopt a Statement of Overriding Considerations. This statement would acknowledge the significant and unavoidable environmental impacts and explain why the benefits of the project outweigh those impacts.

349-3 Impacts associated with soil stability are addressed in Section 3.8, Geology, Soils, and Paleontological Resources, of the Draft EIR. The project would incorporate Project Feature PF-GEO-1: Metro Geotechnical Design Standards, which ensures that the project complies with Metro's Geotechnical Design Standards as outlined in the Metro Rail Design Criteria (MRDC). These standards require thorough geotechnical investigations to assess and address risks such as settlement, slope, instability, and lateral deformations, as well as detailed stability analyses of retaining walls and embankments and incorporation of design features, as necessary, to ensure long-term stability and safety. Retaining walls would be designed with drainage features to manage groundwater and prevent water accumulation behind the walls, thereby maintaining stability during various weather events, including heavy rains. The potential for LPA impacts is addressed in Chapter 4, Evaluation of Alternatives, of the Draft EIR. See MR-13: Soil Stability and Sinkholes.

349-4 See response to Comment 349-3.

349-5 The commenter's support for the Hawthorne Option and bus transit is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 350 Ruby

350-1 Metro welcomes and appreciates all public input received throughout the environmental review and project development process. Comments submitted during the public comment period on the Draft EIR that raise significant environmental issues or otherwise address the adequacy of the Draft EIR are responded to in the Final EIR as required by CEQA. However, all public comments – whether or not they were made during the Draft EIR's public comment period or raise specific environmental issues – are shared with the Metro Board of Directors for consideration. The final decision on whether to approve the project is a policy determination made by the Board, which takes into account both the environmental analysis and the full range of community perspectives, values, and concerns raised throughout the planning process.

350-2 Responses to all comments received on the Draft EIR, regardless of the commenting method, are published with the Final EIR. Metro also published responses to Frequently Asked Questions on the project website, metro.net/clineext during the public comment period to support community understanding and engagement. All comments – whether submitted as a comment on the Draft EIR or otherwise – are part of the administrative record and will be considered by the Metro Board prior to any decision on the project.

Submission 351 Ryan Rodriguez

351-1 The commenter's opposition to implementing the project along the Metro ROW is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives. Metro puts the highest priority on public safety and security. With respect to the potential for explosions, train operations occur above the ground at a safe distance from pipelines and, thus, would not directly create conditions for explosions. Additionally, Section 4.13, Corrections and Additions, of the Final EIR addresses potential impacts related to oil and gas pipelines by amplifying the analysis in Section 3.9-4.2.1 of the Draft EIR through clarifications of the protocols, construction techniques, regulations, and standards with which the project would comply. As detailed therein, the revisions do not change the Draft EIR's conclusion that the impact related to oil and gas pipelines would be less than significant. See MR-7: Utility Relocation and Hazardous Materials Safety and MR-8: Light Rail and Freight Train Safety.

Submission 352 Stanley Hiroshi Wada

352-1 The commenter's concerns about the frequency and duration of light rail operations near their home are noted. The project is expected to operate similarly to other Metro lines, with anticipated service hours from approximately 4:00 a.m. one day to 1:00 a.m. the following day. System headways would be reduced during early morning (4:00 a.m. to 6:00 a.m.) and late-night hours (7:00 p.m. to 1:00 a.m.) to approximately 15 minutes. Peak-hour system headways would be 5 minutes during peak travel hours. Weekend system headways would be reduced compared to weekdays due to reduced commuter demand. It is important to note that light rail vehicles are electrically powered and significantly quieter than freight trains, which are currently the primary source of rail noise in the corridor.

The potential for operational noise impacts is addressed in Section 3.6, Noise and Vibration, of the Draft EIR. The project includes Mitigation Measure MM-NOI-2: Soundwalls to reduce noise impacts to a less than significant level with mitigation. For the Metro ROW alignments, the project would enable local cities to establish Quiet Zones with the Federal Railroad Administration, as part of Project Feature PF-NV-1: Quiet Zone Equipment Installation and Mitigation Measure MM-NOI-4: Quiet Zone Establishment. See MR-3: Operational Noise Project Features and Mitigation Measures; MR-4: Potential Negative Health Effects Related to Noise, Vibration, and Air Quality; and MR-10: Changes to Community Character. The LPA significantly reduces noise impacts compared to the Elevated/At-Grade Alignment because it eliminates the at-grade crossings at 170th and 182nd Streets. By grade separating the light rail from all roadways, the LPA removes the need for audible warning at light rail crossings, such as routine train horns and crossing bells.

See MR-10: Changes to Community Character.

352-2 Metro puts the highest priority on public safety and security. See MR-7: Utility Relocation and Hazardous Materials Safety and MR-8: Light Rail and Freight Train Safety. See MR-8: Light Rail and Freight Train Safety. The LPA would be fully grade-separated from all roadways. The freight track would remain at-grade, but the project would include new pedestrian safety infrastructure, such as gates, which would improve safety compared to existing conditions, where no pedestrian safety infrastructure exists.

352-3 See responses to Comments 352-1 and 352-2.

352-4 CEQA requires the EIR to evaluate and disclose potential environmental impacts, and where necessary, incorporate mitigation measures to reduce significant effects. The comment does not raise any concerns regarding the adequacy of the EIR or significant environmental issues, requiring further response. However, for informational purposes only, it is noted that the legal framework governing public infrastructure projects, including this one, establishes clear regulatory processes and does not impose personal liability on individual decision-makers for actions taken in their official capacities. The project would be developed in compliance with all applicable federal, state, and local regulations, including Metro's own design and safety standards, and the standards of California Public Utilities Commission and the Federal Railroad Administration.

352-5 See responses to Comment 352-1 and MR-4: Potential Negative Health Effects Related to Noise, Vibration and Air Quality.

352-6 See response to Comment 352-2.

352-7 See responses to Comments 352-1 and 352-2. All comments are shared with the Metro Board for their consideration in certifying the EIR. CEQA lawsuits challenging the adequacy of an EIR must be filed within 30 days of the filing of a Notice of Determination (NOD), or approval of the Final EIR, if an NOD is not filed, within 180 days from the date of the agency's decision to carry out or approve the project. Metro, as a public agency, follows all applicable federal, state, and local laws and regulations in the planning, approval, and implementation of transportation projects. There is no legal requirement to respond to comments within 14 days or any other specific time period. Nor is there a requirement to

respond to demands outside of the CEQA Process. Non-response does not imply agreement or acceptance of personal liability, or any other type of liability. The project is being developed in accordance with all relevant laws, and the environmental analysis has been conducted following CEQA's established framework to identify and mitigate potential environmental effects.

Submission 353 Jeanne Bellemin

353-1 The commenter's interest in providing native species shelter and resources is noted. Section 3.7, Biological Resource, of the Draft EIR, discusses implementation of mitigation measures that include general protection measures to avoid and minimize impacts on sensitive biological resources and nesting bird season restrictions, and pre-construction surveys. The potential for LPA impacts is addressed in Chapter 4, Evaluation of Alternatives, of the Draft EIR.

353-2 As discussed in Section 3.7-3.5, Biological Resources, of the Draft EIR, the Metro Tree Policy outlines Metro's commitment to protecting trees, when possible, or replacing trees removed as a result of Metro construction and maintenance. For non-heritage trees, the replacement ratio is two trees for every tree removed. This policy also prioritizes planting strategies that maximize the use of native species. As further detailed in the project's 2023 Urban Design Report, published concurrently with the Draft EIR, Southern California native trees, shrubs and groundcovers would be selected for the project's landscaping based on site-specific conditions and micro-climates. Unique landscape colors, textures and forms, would be considered to highlight and response to the light rail station's location and its adjacent area.

353-3 See response to Comment 353-2.

353-4 See response to Comment 353-2.

Submission 354 Mr. & Mrs. G. Floratos

354-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 355 Anonymous

355-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 356 can be found in Section 5.3 Responses to Public Agencies

Submission 357 April Kubachka

357-1 The commenter's opposition to the Metro ROW alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

357-2 See MR-3: Operational Noise Project Features and Mitigation Measures; MR-4: Potential Negative Health Effects Related to Noise, Vibration, and Air Quality; MR-9: Light Rail Security; See MR-10: Changes to Community Character; MR-11: Traffic Delay and Level-of-Service; and MR-19: Project Benefits.

357-3 The commenter makes the claim that the Draft EIR's impact analyses rely upon "made up or skewed data" is not supported by any specific evidence. The Draft EIR's impact analyses are based on established methodologies, technical studies prepared by qualified subject matter experts, and data from reputable sources. All assumptions, methodologies, and data sources are documented in the Draft EIR and its appendices, consistent with CEQA. The Draft EIR's impact analysis applies significance thresholds that are informed by the CEQA Guidelines and tailored to the specific context of the project. The threshold referenced in the comment is found in Section 3.1, Transportation of the Draft EIR, and evaluates whether the project design could introduce risks, such as those from sharp curves or incompatible uses, which could affect transportation safety. The Draft EIR concludes that the project would not substantially increase such hazards, based on site-specific conditions, project design features, and the incorporation of safety improvements. The LPA would further reduce potential risks by fully grade separating the light rail system, thereby eliminating at-grade light rail crossings.

Metro puts the highest priority on public safety and security. See MR-7: Utility Relocation and Hazardous Materials Safety and MR-8: Light Rail and Freight Train Safety.

357-4 The commenter's opposition to the project is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 358 can be found in Section 5.3 Responses to Agency Comments

Submission 359 Keith Kubachka

359-1 The commenter's opposition to the Metro ROW Alignment is noted. All comments have been shared with the Metro Board for their consideration.

359-2 CEQA requires analysis of physical environmental impacts, such as air quality, noise, and aesthetics, which are evaluated in detail throughout the Draft EIR. Social conditions such as crime and revitalization outcomes are outside the scope of CEQA analysis. However, Metro is committed to ensuring the safety of its transit system. See MR-9: Light Rail Security.

359-3 As described in subsections 3.6.5 and 3.6-6 of the Draft EIR, Mitigation Measure MM-VIB-3: Pre and Post Construction Surveys would determine whether construction causes any damage and remediate it. The Draft EIR analyzes light rail train operations per Federal Railroad Administration guidelines and determines operational vibration would not cause damage to nearby structures. See MR-13: Soil Stability and Sinkholes.

359-4 The commenter's opposition to the project is noted. All comments have been shared with the Metro Board for their consideration.

Submission 360 Lesley Phillips

360-1 The commenter's opposition to the Metro ROW alignment is noted. See MR-1: Selection of Alternatives. As described in Chapter 2, Project Description, of the Draft EIR, the light rail guideway would be fully enclosed with physical barriers, such as fencing, soundwalls, or a combination of both. These barriers would prevent unauthorized access to prevent both people and animals from entering the tracks. For more information regarding the project's rail safety, see MR-8: Light Rail and Freight Train Safety and MR-10: Changes to Community Character.

360-2 See MR-3: Operational Noise Project Features and Mitigation Measures. The LPA would significantly reduce noise impacts compared to the Elevated/At-Grade Alignment because it eliminates the at-grade light rail crossings at 170th and 182nd Streets. By grade separating the light rail from all roadways, the LPA removes the need for audible warning at light rail crossings, such as routine train horns and crossing bells.

Submission 361 Mark Nelson

361-1 See MR-4: Potential Negative Health Effects Related to Noise, Vibration, and Air Quality. The LPA significantly reduces noise impacts compared to the Elevated/At-Grade Alignment because it eliminates the at-grade crossings at 170th and 182nd Streets. By grade separating the light rail from all roadways, the LPA removes the need for audible warning at light rail crossings, such as routine train horns and crossing bells.

Submission 362 Michael Kim

362-1 The commenter's support for the No Project Alternative is noted. See MR-1: Selection of Alternatives. While the commenter expresses concerns about project staffing, Metro is advancing this project with dedicated teams of experienced professionals, including engineers, planners, and safety experts, who would continue to work in coordination with regulatory agencies, contractors, and local jurisdictions to ensure safe and effective project implementation. In addition to Metro's own design and safety standards, Metro is working in coordination with the standards of California Public Utilities Commission (CPUC) and the Federal Railroad Administration (FRA) to ensure that the project follows all safety standards. See MR-8: Light Rail and Freight Train Safety.

362-2 The commenter's support for the Hawthorne Option is noted. All comments have been shared with the Metro Board for their consideration. Safety is a top priority for Metro. See MR-8: Light Rail and Freight Train Safety.

Submission 363 Randall Abram

363-1 There are several existing Metro rail lines that run adjacent to a freight line, including the existing Metro C Line (Green) in El Segundo and Redondo Beach. See MR-8: Light Rail and Freight Train Safety.

363-2 The commenter's opposition to the Metro ROW alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 364 Ray Hollar

364-1 CEQA guidelines requires a Draft EIR to include in its summary "Areas of controversy known to the lead agency including issues raised by agencies and the public; and Issues to be resolved including the choice among alternatives and whether or how to mitigate the significant effects."

Areas of controversy are based on issues raised during scoping, other feedback from the community, and issues not resolved by the Draft EIR. Metro records all feedback received through official channels and does its best to summarize any areas of controversy. Parking is no longer permissible as a CEQA impact criterion and is not addressed in the Draft EIR. Metro understands that parking is often a point of concern for communities. See the 2023 Transportation Detail Report, published concurrently with the Draft EIR, as well as the Draft EIR Executive Summary for a discussion of lost parking spaces.

Submission 365 Ray Hollar

365-1 Submission 65 includes the same comment from the same commenter. See response to Comment 65-1.

365-2 The transition the commenter refers to is necessary in order to avoid high-power utility lines, as explained in response to Comment 365-1, and is not proposed as a cost-savings measure.

Submission 366 Ray Hollar

366-1 The commenter requested information on the meaning of user benefits in the context of taking the train versus driving a car. Metro's technical team provided clarification by email on March 1, 2023, so that the commenter could effectively comment on the methodology behind the user benefits, explaining that Metro uses the Federal Transit Administration's (FTA) definition and method[1] for calculating user benefits, which reflects the improvements in regional mobility which is measured by the weighted in- and out-of-vehicle changes in travel-time for users of the regional transit system caused by the implementation of the proposed new project. This methodology does factor in waiting for transit as well as travel time to the project, whether by car or other means of transportation, such as walking or bus

366-2 The commenter provided their assessment of how Metro should calculate user benefits and shared their conclusions with Metro in the comment. In order to clarify the methodology used by Metro so the commenter could comment more specifically on Metro's methodology, the Metro's technical team included in the March 1, 2023 clarification email an explanation that FTA has a specific methodology for calculating user

[1] https://www.transit.dot.gov/sites/fta.dot.gov/files/docs/FY12_Evaluation_Process(2).pdf

benefits. Per the FTA, user benefits consider all components of travel such as drive time, access time, wait time, time in the vehicle, egress time, etc. The total region or systemwide changes are estimated and expresses as minutes of system user benefits. In Metro's email response, an example of a user benefits calculation was provided for further understanding.

366-3 In response to Metro's clarification email, the commenter discussed the differences between their methodology for calculating user benefits and Metro's. Metro would continue to use the definition and methodology provided by the FTA for calculating user benefits, as it is the industry standard.

366-4 In response to Metro's clarification email, the commenter requested budget, and a breakdown of components used for Metro's user benefit per project trip. User benefit is a measure of the combined savings for existing as well as new riders from all modes, not just for a trip-by-trip basis, so this value cannot be provided in the context of user benefits.

366-5 In response to Metro's clarification email, the commenter asked about Metro's confidence in its ridership modeling methodology in the context of the COVID-19 pandemic's impact on rail ridership and transit ridership recovery toward pre-pandemic values. As a global pandemic scenario is infrequent, the model does not consider future pandemic scenarios in the ridership projections. See MR-15: Metro Ridership Forecasting Methodology.

Submission 367 can be found in Section 5.4 Responses to Groups and Organizations

Submission 368 Karen Ruby

368-1 The commenter's opposition to using the Metro ROW for the project is noted. See MR-1: Selection of Alternatives. The LPA significantly reduces noise impacts compared to the Elevated/At-Grade Alignment because it eliminates the at-grade crossings at 170th and 182nd Streets. By grade separating the light rail from all roadways, the LPA, Trench Option, and Hawthorne Option avoid the need for audible warning at light rail crossings, such as routine train horns and crossing bells. See MR-10: Changes to Community Character.

368-2 While the freight train passes by about twice a day, light rail systems are electrically powered and generate lower noise and vibration levels than freight, which are heavier and typically diesel-powered. The anticipated hours of operation are 4:00 a.m. one day to 1:00 a.m. the following day. System headways would be reduced during early morning (4:00 a.m. to 6:00 a.m.) and late-night hours (7:00 p.m. to 1:00 a.m.) to approximately 15 minutes. This would result in a reduced frequency of trains during these hours and reduced overall noise compared to peak-hour system headways of 5 minutes.

368-3 Metro puts the highest priority on public safety and security. See MR-4: Potential Negative Health Effects Related to Noise, Vibration, and Air Quality, MR-8: Light Rail and Freight Train Safety, and MR-9: Light Rail Security.

368-4 The commenter's support for the Hawthorne Option is noted. All comments have been shared with the Metro Board for their consideration.

368-5 The project has secured funding from Measure R (2008), Measure M (2016), Transit and Intercity Rail Capital Program (TIRCP) Grant from the California State Transportation Agency Transit and Intercity Rail Capital Program, and 3% match contributions from local jurisdictions. Metro is committed to the responsible use of public funds and to managing project costs efficiently, while continuing to pursue additional funding sources to support project delivery.

368-6 See response to Comment 368-1.

368-7 Metro understands the importance of maintaining an environment conducive to professional and educational performance and focus for residents of all ages. Noise levels in areas near the alignment options have been carefully modeled, and where mitigation is necessary, measures have been proposed to reduce noise impacts to less than significant where possible.

The Hybrid Alternative, referred to in the Draft EIR as the 170th/182nd Light Rail Transit Alternative in the Draft EIR, has been selected as the LPA for the purposes of the Final EIR. The Hybrid Alternative eliminates at-grade crossings at 170th and 182nd Streets, thereby removing the need for audible light rail at-grade warnings, including light train horns and crossing bells, which significantly reduces noise impacts compared to the Proposed Project. As described in Chapter 4, Evaluation of Alternatives, of the Draft EIR and Chapter 2, Description of the Locally Preferred Alternative, of the Final EIR, the operational noise and vibration impacts of the Hybrid Alternative would be comparable to those of the Trench Option and would be less than significant with mitigation. See MR-3: Operational Noise Project Features and Mitigation Measures and MR-4: Potential Negative Health Effects Related to Noise, Vibration and Air Quality. See MR-4 for more information regarding health effects from noise and vibration.

368-8 See response to Comment 368-2.

Submission 369 Theodore Otvos

369-1 The commenter's support for the Hawthorne Option and opposition to the Metro ROW alignment is noted. See MR-1: Selection of Alternatives.

Section 3.6. Noise and Vibration, of the Draft EIR, discloses that each Metro ROW alignment option would result in potentially significant construction-related noise and vibration impacts. To address these impacts, the project would implement Mitigation Measures MM NOI-1: Noise Control Plan, MM-VIB-1: Vibration Control Plan, MM-VIB-2: Construction Equipment Location, and MM-VIB-3: Pre- and Post- Construction Surveys. While implementation of these measures would reduce the construction noise and vibration impacts to the maximum extent feasible, some noise and vibration impacts during construction would remain significant and unavoidable. These impacts would be temporary and would cease upon the completion of construction activities.

For operational noise and vibration, the project includes Mitigation Measure MM-NOI-2: Soundwalls to reduce noise impacts to a less than significant level with mitigation. For the Metro ROW alignments, the project would enable local cities to establish Quiet Zones with the Federal Railroad Administration, as part of Project Feature PF-NV-1: Quiet Zone

Equipment Installation and Mitigation Measure MM-NOI-4: Quiet Zone Establishment. See MR-3: Operational Noise Project Features and Mitigation Measures; MR-5: Vibration Impact Types and Impact Thresholds; and MR-6: Vibration Analysis During Final Design. The LPA significantly reduces noise impacts compared to the Elevated/At-Grade Alignment because it eliminates the at-grade crossings at 170th and 182nd Streets. By grade separating the light rail from all roadways, the LPA removes the need for audible warning at light rail crossings, such as routine train horns and crossing bells. The potential for LPA impacts is addressed in Chapter 4, Evaluation of Alternatives, of the Draft EIR.

See MR-10: Changes to Community Character.

Submission 370 Theodore Otvos

370-1 The commenter's support for the Hawthorne Option and opposition to implementing project along the Metro ROW alignment is noted. See MR-1: Selection of Alternatives.

The presence of natural gas lines and petroleum pipelines, their potential impacts, and applicable regulatory requirements are addressed in Sections 3.9, Hazards and Hazardous Materials, and 3.11, Utilities and Service Systems, of the Draft EIR. Potential impacts of the LPA in this context are evaluated in Chapter 4, Evaluation of Alternatives, of the Draft EIR. In addition, Section 4.13, Corrections and Additions, of the Final EIR expands on the analysis in Section 3.9-4.2.1 of the Draft EIR by clarifying the protocols, construction techniques, regulations, and standards with which the project would comply. As detailed therein, the revisions do not change the Draft EIR's conclusion that the impact related to oil and gas pipelines would be less than significant. See MR-7: Utility Relocation and Hazardous Materials Safety and MR-8: Light Rail and Freight Train Safety.

Submission 371 Yumiko Omatsu

371-1 The commenter's opposition to the Metro ROW alignment is noted. See MR-1: Selection of Alternatives.

There is sufficient space for the proposed light rail and freight track within the Metro ROW. See Appendix 2-A, Select Advanced Conceptual Engineering Drawings, of the Draft EIR and Final EIR Appendix B, Select Advanced Conceptual Engineering Drawings- Locally Preferred Alternative, for more details. See MR-7: Utility Relocation and Hazardous Materials Safety and MR-8: Light Rail and Freight Train Safety.

The presence of natural gas lines and petroleum pipelines, their potential impacts, and applicable regulatory requirements are addressed in Sections 3.9, Hazards and Hazardous Materials, and 3.11, Utilities and Service Systems, of the Draft EIR. Potential impacts of the LPA in this context are evaluated in Chapter 4, Evaluation of Alternatives, of the Draft EIR. In addition, Section 4.13, Corrections and Additions, of the Final EIR expands on the analysis in Section 3.9-4.2.1 of the Draft EIR by clarifying the protocols, construction techniques, regulations, and standards with which the project would comply. As detailed therein, the revisions do not change the Draft EIR's conclusion that the impact related to oil and gas pipelines would be less than significant.

The Draft EIR fully assesses potential construction and operational impacts, including noise, air quality, and vibration, for all alignment options. These analyses are set forth in Section 3.6, Noise and Vibration, and Section 3.4, Air Quality, of the Draft EIR. Mitigation Measures MM-NOI-1: Noise Control Plan and MM-NOI-2: Soundwalls would be implemented to minimize noise and vibration impacts for sensitive receptors, including residents adjacent to Metro ROW. Project Feature PF-AQ-2: Dust Control Best Practices would ensure construction complies with best available control technology to control emissions and dust during construction. See MR-3: Operational Noise Project Features and Mitigation Measures and MR-4: Potential Negative Health Effects Related to Noise, Vibration, and Air Quality. The LPA significantly reduces noise impacts compared to the Elevated/At-Grade Alignment because it eliminates the at-grade crossings at 170th and 182nd Streets. By grade separating the light rail from all roadways, the LPA removes the need for audible warning at light rail crossings, such as routine train horns and crossing bells. The potential for LPA impacts is addressed in Chapter 4, Evaluation of Alternatives, of the Draft EIR.

Safety is a top priority for Metro. Metro puts the highest priority on public safety and security. MR-9: Light Rail Security.

Submission 372 Adam Karp

372-1 Submission 372 includes the same comments from the same commenter. See responses to Comments 298-1 through 298-10.

Submission 373 Monique Negrete-Mitchell

373-1 While overall construction would occur over multiple years, work at any given location would be temporary, and would shift over time as construction progresses through different aspects and locations of the project.

See MR-4: Potential Negative Health Effects Related to Noise, Vibration, and Air Quality.

373-2 The Draft EIR has identified significant and unavoidable impacts during construction for all rail alignment options and alternatives studied along the Metro ROW and Hawthorne Boulevard related to noise and vibration. As described in Chapter 4, Evaluation of Alternatives, of the Draft EIR, the LPA (the 170th/182nd Grade-Separated Light Rail Transit Alternative) would have significant and unavoidable construction impacts related to noise and vibration. Under CEQA, when a project has significant and unavoidable impacts, the Lead Agency (here, Metro), may not approve the project unless it finds that the benefits of the project outweigh the significant and unavoidable impacts. See also MR-1: Selection of Alternatives, and MR-4: Potential Negative Health Effects Related to Noise, Vibration, and Air Quality.

373-3 The commenter's support for the Hawthorne Option is noted. As outlined in the Executive Summary of the Draft EIR, the Elevated/At-Grade Alignment would result in significant and unavoidable noise impacts during both construction and operation. In contrast, the Hawthorne Option would result in a significant and unavoidable noise impact only during construction. The LPA would also result in a significant noise impact during construction

but is expected to have a less-than-significant noise impact during operation, because the light rail system would be fully grade-separated. Additionally, while the establishment of a quiet zone (intended to reduce noise from freight rail operations), is the responsibility of the local cities, the project would provide all the necessary upgrades at freight crossings needed to support the establishment of a quiet zone, should the cities choose to pursue it.

373-4 The presence of natural gas lines and petroleum pipelines, their potential impacts, and applicable regulatory requirements are addressed in Sections 3.9, Hazards and Hazardous Materials, and 3.11, Utilities and Service Systems, of the Draft EIR. Potential impacts of the LPA in this context are evaluated in Chapter 4, Evaluation of Alternatives, of the Draft EIR. In addition, Section 4.13, Corrections and Additions, of the Final EIR expands on the analysis in Section 3.9-4.2.1 of the Draft EIR by clarifying the protocols, construction techniques, regulations, and standards with which the project would comply. As detailed therein, the revisions do not change the Draft EIR's conclusion that the impact related to oil and gas pipelines would be less than significant. See MR-7: Utility Relocation and Hazardous Materials Safety for more information.

With respect to soil conditions related to clay conditions, Section 3.8-3.2, Local Geology, of the Draft EIR describes the geologic units underlying the RSA, which consist of Quaternary deposits composed (from the bottom to the surface) of the 1,400-foot-thick early Pleistocene-aged San Pedro formation, the 1,000-foot-thick late Pleistocene Lakewood formation and older sand dunes, and approximately 300 feet of Holocene-aged alluvium, which is capped by aeolian (i.e., wind-blown) deposits. As detailed in Section 3.8-3.2 of the Draft EIR, the San Pedro formation is primarily stiff clay with interbedded sand and gravel. The Lakewood formation is dense to very dense sand, clayey sand, silty sand (interbedded with very stiff to hard silty to sandy clay), and clayey silt. The Pleistocene old alluvium (map symbol Qoa) moderately consolidated, moderately dissected clay, silt, sand and gravel, and sand dune (eolian) deposits (Qoe) are primarily composed of medium-dense to very dense, well-sorted, medium- to coarse-grained sand with some silt and silty sand. Thus, the Draft EIR acknowledges the presence of clay within the RSA. Pursuant to Project Feature PF-GEO-1: Metro Geotechnical Design Standards, site-specific geotechnical investigations would be conducted to address foundation and structural safety. The investigation would include engineering and constructions recommendations to address existing soil conditions and ensure surrounding structures are not damaged. The geotechnical report recommendations would be incorporated into the project plans and specifications, which would prevent potential impacts related to soil conditions, including clay, from occurring, should such conditions be present. Regarding the potential for sinkholes, see MR-13: Soil Stability and Sinkholes.

373-5 Section 3.6, Noise and Vibration, of the Draft EIR, analyzes potential impacts related to vibration and concludes that all the Metro ROW alignments and Hawthorne alignment would result in significant and unavoidable impacts related to vibration damage during construction. The same impacts, however, would be less than significant with mitigation for the LPA, Trench Option, and Hawthorne Option. See MR-13: Soil Stability and Sinkholes for additional information.

373-6 While privacy is not considered an environmental impact under CEQA, Metro understands that this may be a concern for residents, and is committed to minimizing potential

intrusions where feasible. During construction, activities near residential properties, including work on the berm, would be temporary and limited to specific phases of construction. Construction contractors would adhere to standard codes of conduct to ensure professional behavior on construction sites. During operation, privacy impacts from the light rail vehicles themselves are expected to be minimal. Trains would be in motion and would not stop or slow near residential properties, greatly limiting opportunities for riders or operators to observe private activities. In addition, light rail vehicles are generally enclosed and would be elevated or grade-separated, further reducing the potential for visual intrusion. Metro would continue to evaluate ways to minimize disruptions in accordance with applicable legal requirements and as part of the project's ongoing planning and outreach efforts.

373-7 The estimate of 101 dump trucks per day refers to project-wide construction activities and does not reflect the volume of trucks or equipment at a single location along the alignment. Detailed information on construction scheduling would be provided to the community in advance of any construction activities, if the project is approved for implementation.

As described in the Draft EIR's construction analyses, the project includes project features and would implement mitigation measures to address construction-related disruptions and impacts, including noise, dust, and vibration. Even with implementation of construction Mitigation Measures MM-NOI-1: Noise Control Plan and MM VIB-1: Vibration Control Plan through MM-VIB-3: Pre- and Post-Construction Surveys, construction of the project would result in significant and unavoidable noise and vibration impacts. In the event the Metro Board decides to approve the project, it would be required to adopt a Statement of Overriding Consideration, finding that the project's benefits outweigh its significant and unavoidable environmental impacts.

Regarding privacy, see response to Comment 373-6.

373-8 See response to comment 373-6.

373-9 The commenter's support for the Hawthorne Option is noted. See MR-1: Selection of Alternatives and MR-4: Potential Negative Health Effects Related to Noise, Vibration, and Air Quality.

Submission 374 Angelica Vicente

374-1 No traction power substations located on private property would be within residential property. Section 2.3-4.4.2, Traction Power Substations, of the Draft EIR, provides a description of the location of each proposed traction power substation (TPSS). See Appendix 2-A, Select Advanced Conceptual Engineering Drawings, of the Draft EIR, Select Advanced Conceptual Engineering Drawings and Final EIR Appendix B, Select Advanced Conceptual Engineering Drawings- Locally Preferred Alternative, for more detailed information on the location of the traction power substations.

Submission 375 Holly Osborne

375-1 Structures that would be potentially affected by construction and operational vibration in the vicinity of Breakwater Village have been correctly identified and identified impacts mitigated. Importantly, mitigation is applied to the rail tracks, which would mitigate effects for all surrounding sensitive uses and not solely at individual residences. Regardless of the specific unit count, the analysis is applied for the entire row of structures. Mitigating the effect at the source is the most effective way to reduce vibration propagation to nearby sensitive uses.

Based on the general assessment conducted for the Draft EIR, only a construction vibration impact would potentially occur at this location and operational impact contours would not extend beyond the Metro ROW. The operational analysis considers both the potential shift of freight rail tracks and the addition of light rail transit tracks to result in vibration annoyance. As described in Section 3.6, Noise and Vibration, of the Draft EIR, Section 3.6-5, the project would be required to implement vibration mitigation measures MM-VIB-3: Pre- and Post-Construction Surveys through MM-VIB-6: Ballast Mats, which would require low impact frogs, resilient rail fasteners, and/or ballast mats. Operational vibration impacts would be reduced to less than the Federal Transportation Administration (FTA) vibration annoyance impact threshold and would be less than significant with mitigation.

375-2 This townhouse was mistakenly counted as two units, based on aerial imagery. The total count of residences affected was updated to 268 in Section 4.10, Corrections and Additions, of the Final EIR. This correction does not change the conclusions of the Draft EIR, as the analysis and mitigation measures remain applicable to the revised total. See response to Comment 375-1.

375-3 The Draft EIR identified seven structures along the west side of the Metro ROW between Grant Avenue and Artesia Boulevard that would be potentially impacted by groundborne vibration damage during construction based on aerial imagery. Breakwater Village fronting the Metro ROW appears to be only one structure. As the structure has an approximately 400 foot long frontage along the Metro ROW, two analytical points were added for this one structure to ensure potential vibration was evaluated adequately at different points of the building. It is important to note that only the structures immediately adjacent to the Metro ROW were identified as affected in the analysis. Regardless of the specific unit count, the vibration analysis correctly analyzed the potential for vibration damage impacts at the identified structures. The construction vibration contours were assessed for the entire building structure, in accordance with the FTA Transit Noise and Vibration Impact Assessment Manual (FTA, 2018). The specific number of units is not required to be identified because the concern is damage to the building structure, not specific units; therefore, the conclusions of the Draft EIR are still valid.

375-4 See response to Comment 375-3.

375-5 The commenter's support for the Hawthorne Option and opposition to the Metro ROW alignment is noted. See MR-1: Selection of Alternatives. Section 3.6, Noise and Vibration,

of the Draft EIR, analyzed the project's potential impacts on structures, and concluded that with mitigation measures, the majority of structural damage impacts from construction vibration would be mitigated to below the threshold for the Elevated/At-Grade Alignment. However, it would not be possible to fully mitigate vibration impacts at one structure adjacent to the Grant Avenue freight bridge reconstruction, and therefore there would be a significant and unavoidable impact related to vibration damage during construction for the Elevated/At-Grade Alignment. The Trench Option and LPA would not require the Grant Avenue freight bridge to be reconstructed, and the impact would be less than significant with mitigation. The potential for LPA impacts is addressed in Chapter 4, Evaluation of Alternatives, of the Draft EIR and Chapter 4, Corrections and Additions, of the Final EIR. See MR-5: Vibration Impact Types and Impact Thresholds and MR-6: Vibration Analysis During Final Design.

375-6 See response to Comment 375-3.

Submission 376 Steve & Michelle Polcari

376-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration.

Submission 377 Blake Jung

377-1 The commenter's support for the Hawthorne Option is noted. See MR-1: Selection of Alternatives. Potential noise and vibration impacts are addressed in Section 3.6, Noise and Vibration, of the Draft EIR. The potential for LPA impacts is addressed in Chapter 4, Evaluation of Alternatives, of the Draft EIR. See MR-1: Selection of Alternatives; MR-2: Operational Noise Analysis Methodology and Impact Thresholds; MR-3: Operational Noise Project Features and Mitigation Measures; MR-4: Potential Negative Health Effects Related to Noise, Vibration, and Air Quality; MR-5: Vibration Impact Types and Impact Thresholds; and MR-6: Vibration Analysis During Final Design.

377-2 See MR-16: Response to Lawndale and Redondo Beach Community Letter.

377-3 See MR-16: Response to Lawndale and Redondo Beach Community Letter.

377-4 See MR-16: Response to Lawndale and Redondo Beach Community Letter.

377-5 See MR-16: Response to Lawndale and Redondo Beach Community Letter.

377-6 See MR-16: Response to Lawndale and Redondo Beach Community Letter.

377-7 See MR-16: Response to Lawndale and Redondo Beach Community Letter.

377-8 See MR-16: Response to Lawndale and Redondo Beach Community Letter.

Submission 378 Conor Sullivan

378-1 It is unclear what is meant by "P1/18 Utilities," as used in the comment. The presence of natural gas lines and petroleum pipelines, their potential impacts, and applicable regulatory requirements are addressed in Sections 3.9, Hazards and Hazardous Materials, and 3.11, Utilities and Service Systems, of the Draft EIR. Potential impacts of the LPA in this context are evaluated in Chapter 4, Evaluation of Alternatives, of the Draft EIR. In addition, Section 4.13, Corrections and Additions, of the Final EIR expands on the analysis in Section 3.9-4.2.1 of the Draft EIR by clarifying the protocols, construction techniques, regulations, and standards with which the project would comply. As detailed therein, the revisions do not change the Draft EIR's conclusion that the impact related to oil and gas pipelines would be less than significant. See MR-7: Utility Relocation and Hazardous Materials Safety, MR-8: Light Rail and Freight Train Safety. Consistent with Appendix G of the CEQA Guidelines, the analysis in Section 3.11, Utilities and Service Systems, of the Draft EIR appropriately focuses on the potential physical environmental effects that could be caused by relocation or construction of new or expanded natural gas and oil facilities. Based on this criterion, the Draft EIR concludes that none of the project options would result in significant impacts, as indicated on pages 3.11-20, 3.11-22, and 3.11-24 of the Draft EIR. This determination reflects the inclusion of project features, such as PF-US-1: Utility Identification and Coordination, which would ensure proper utility identification, coordination, and relocation measures prior to construction. For more information, refer to MR-7: Utility Relocation and Hazardous Materials Safety.

Hazards related to privately owned pipelines, including the risk of fire and explosion, are analyzed in Section 3.9, Hazards and Hazardous Materials, of the Draft EIR. As detailed on pages 3.9-35 through 3.9-40 of the Draft EIR, the project would not create a significant hazard to the public or the environment through reasonably foreseeable upset and accidental conditions involving the release of hazardous materials into the environment. Moreover, the project would comply with all applicable laws, including State regulations specifically designed to prevent gas explosions. (See Draft EIR, p. 3.9-3.) These laws include stringent standards for utility relocation and construction near gas pipelines, which would be adhered to throughout the project's implementation. As noted above, additions related to the risk of fire and explosion due to pipelines were added to Chapter 4, Corrections and Additions, of the Final EIR.

Regarding the commenter's suggestion to remove pipelines as part of the project, CEQA requires that the analysis evaluate the project's potential to cause new or worsened environmental impacts, rather than addressing pre-existing conditions. The Draft EIR concludes that the project would not increase the risk of hazards associated with gas pipelines to a level that constitutes a significant impact. Therefore, no additional mitigation, including pipeline removal, is required under CEQA.

378-2 See response to Comment 378-1.

378-3 The Draft EIR evaluates reasonably foreseeable risks associated with construction activities, including excavation work, and identifies project features and measures to minimize those risks. Construction would be subject to extensive safety requirements under federal, state, and local regulations, including worker safety standards, soil stability

and excavation protocols, and public safety measures. While human error can never be entirely eliminated, adherence to these strict regulatory standards, combined with Metro's construction management practices, would minimize the likelihood and severity of potential incidents. As such, the Draft EIR appropriately evaluates the project's construction-related risks consistent with CEQA requirements. See response to Comment 378-1, as well as MR-7: Utility Relocation and Hazardous Materials Safety, MR-8: Light Rail and Freight Train Safety; and MR-13: Soil Stability and Sinkholes.

378-4 See response to Comment 378-1.

378-5 While change in community character does not constitute a significant impact under CEQA, Section 3.2, Land Use, of the Draft EIR, analyzes the project's potential to physically divide communities. The project would result in less than significant impacts. Under the LPA, Trench Option and Hawthorne Option, the light rail guideway would be fully grade-separated from all roadways. Pedestrians would cross streets at-grade and avoid any conflicts with light rail trains. The potential for LPA impacts is addressed in Chapter 4, Evaluation of Alternatives, of the Draft EIR.

378-6 The commenter's opposition to the project in Lawndale is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

378-7 The commenter's opposition to the project is noted. Metro is committed to equity and would continue to prepare inclusive outreach and engagement strategies as Metro advances the project. See MR-19: Project Benefits.

Submission 379 David Bailey

379-1 The commenter's support for the project, and for the Metro ROW alignment, is noted. See MR-1: Selection of Alternatives. The same transit lines would serve all alignments, with stops at either the South Bay Galleria station for the Hawthorne Option or the Redondo Beach Transit Center Station for the Metro ROW alignments.

Submission 380 Denise

380-1 See MR-16: Response to Lawndale and Redondo Beach Community Letter.

380-2 See MR-16: Response to Lawndale and Redondo Beach Community Letter.

380-3 See MR-16: Response to Lawndale and Redondo Beach Community Letter.

380-4 See MR-16: Response to Lawndale and Redondo Beach Community Letter.

380-5 See MR-16: Response to Lawndale and Redondo Beach Community Letter.

380-6 See MR-16: Response to Lawndale and Redondo Beach Community Letter.

380-7 See MR-16: Response to Lawndale and Redondo Beach Community Letter.

Submission 381 Doug Boswell

381-1 The commenter's support for the Hawthorne Option is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

381-2 The 2023 Ridership Summary Report, published alongside the Draft EIR, shows that the project is expected to generate between 11,500 to 15,600 daily transit trips (boardings). The Hawthorne Option would generate slightly higher ridership. See MR-15: Metro Ridership Forecasting Methodology.

Submission 382 Frank Fuentes

382-1 The commenter's opposition to the Metro ROW alignments and preference for the Hawthorne Option is noted. Metro is committed to integrating safety into all Metro rail operations. The project would comply with relevant safety standards, including the California Manual on Uniform Traffic Control Devices, the California Department of Transportation Highway Design Manual, the Americans with Disabilities Act (ADA) and Metro's Grade Crossing Safety Policy. In addition, similar to the Hawthorne and Trench Options, the LPA's light rail guideway would be fully grade-separated from all roadways, thereby avoiding potential conflicts with pedestrians or cyclists. See MR-9: Light Rail Security.

Potential noise impacts are addressed in Section 3.6, Noise and Vibration, of the Draft EIR. The potential for LPA impacts is addressed in Chapter 4, Evaluation of Alternatives, of the Draft EIR. See MR-1: Selection of Alternatives, MR-2: Operational Noise Analysis Methodology and Impact Thresholds, MR-3: Operational Noise Project Features and Mitigation Measures, and MR-4: Potential Negative Health Effects Related to Noise, Vibration, and Air Quality.

Submission 383 Ian Stern

383-1 Metro understands the importance of minimizing noise impacts during sensitive nighttime hours, including for families with children. Potential noise impacts are addressed in Section 3.6, Noise and Vibration, of the Draft EIR. Along the Metro ROW, the LPA and Trench Option significantly reduce noise impacts compared to the Elevated/At-Grade Alignment because they eliminate the at-grade crossings at 170th and 182nd Streets. In addition, the Metro ROW alignments would enable the local jurisdictions along the Metro ROW to obtain a "quiet zone" designation, which would reduce existing freight noise overall along the corridor, by eliminating freight horn soundings, which typically produces noise levels of up to 110 dBA (a-weighted decibel). See MR-1: Selection of Alternatives; MR-2: Operational Noise Analysis Methodology and Impact Thresholds; MR-3: Operational Noise Project Features and Mitigation Measures; and MR-4: Potential Negative Health Effects Related to Noise, Vibration, and Air Quality.

383-2 Metro is committed to integrating safety into all Metro rail operations. The project would comply with relevant safety standards, including the California Manual on Uniform Traffic Control Devices, the California Department of Transportation Highway Design Manual, the Americans with Disabilities Act (ADA), and Metro's Grade Crossing Safety Policy. In

addition, similar to the Trench and Hawthorne Options, the LPA would fully grade separate the light rail from all roadways, thereby avoiding potential conflicts with pedestrians or cyclists. See MR-8: Light Rail and Freight Train Safety and MR-9: Light Rail Security.

383-3 See response to Comment 383-1.

Submission 384 Ignatius Lin

384-1 The commenter's support for a station within the City of Lawndale is noted. In the previous planning stages, stations were proposed in Lawndale, including as part of the 2018 Supplemental Alternatives Analysis, but at the request of Lawndale was removed from consideration.

384-2 There is sufficient space for the proposed light rail and freight track at-grade within the Metro ROW. See Appendix 2-A, Select Advanced Conceptual Engineering Drawings, of the Draft EIR and Final EIR Appendix B, Select Advanced Conceptual Engineering Drawings-Locally Preferred Alternative, for more details regarding the alignment and design considerations in this area.

It should be noted that, as shown in Draft EIR, Table 4.2-1, *Summary of Alternatives Considered and Rejected*, Metro considered a deep-bore tunnel alignment during scoping for the Draft EIR. However, this alignment was not selected for further study due to significantly higher costs, real estate needs, and the potential for increased significant impacts.

384-3 The commenter's support for the Hawthorne Option, and secondarily for the Trench Option, and opposition to an at-grade or elevated project in Metro ROW is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 385 James Hill

385-1 The commenter's support for using the Metro ROW and the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

385-2 See response to Comment 385-1.

385-3 The commenter's opposition to the Hawthorne Option is noted. All comments have been shared with the Metro Board for their consideration.

385-4 The commenter's support for the project is noted. All comments have been shared with the Metro Board for their consideration.

Submission 386 Janice Tanabe

386-1 Section 3.11, Utilities and Service Systems, does not evaluate impacts to emergency response times, as those are evaluated in Section 3.1, Transportation, of the Draft EIR.

Similar to the Trench and Hawthorne Options, the LPA light rail guideway would be fully grade-separated from all roadways. The potential for LPA impacts is addressed in Chapter 4, Evaluation of Alternatives, of the Draft EIR. There would be no change to existing emergency vehicle delays at 182nd Street. For the Elevated/At-Grade Alignment, the addition of the light rail service to the existing at-grade crossing at 182nd Street would increase the frequency of the railroad crossing gate down time relative to existing conditions but would not permanently close emergency access. The homes and businesses on either side of the 182nd Street railroad crossing would remain accessible by alternate routes within ½ mile that are grade-separated crossings and not affected by train frequency. With respect to emergency access during construction, as discussed in Section 3.1-4.4 of the Draft EIR, construction traffic management plans under Project Feature PF-T-1: Construction Traffic Management Plan would ensure that adequate emergency access is maintained. See MR-12: Emergency Access.

386-2 See response to Comment 386-1.

Submission 387 Jeanette McGuire

387-1 Potential noise impacts are addressed in Section 3.6, Noise and Vibration, of the Draft EIR. The potential for LPA impacts is addressed in Chapter 4, Evaluation of Alternatives, of the Draft EIR. See MR-1: Selection of Alternatives, MR-2: Operational Noise Analysis Methodology and Impact Thresholds, MR-3: Operational Noise Project Features and Mitigation Measures, and MR-4: Potential Negative Health Effects Related to Noise, Vibration, and Air Quality.

The presence of natural gas lines and petroleum pipelines, their potential impacts, and applicable regulatory requirements are addressed in Sections 3.9, Hazards and Hazardous Materials, and 3.11 Utilities and Service System, of the Draft EIR. Potential impacts of the LPA in this context are evaluated in Chapter 4, Evaluation of Alternatives, of the Draft EIR. In addition, Section 4.13, Corrections and Additions, of the Final EIR expands on the analysis in Section 3.9-4.2.1 of the Draft EIR by clarifying the protocols, construction techniques, regulations, and standards with which the project would comply. As detailed therein, the revisions do not change the Draft EIR's conclusion that the impact related to oil and gas pipelines would be less than significant. See MR-7: Utility Relocation and Hazardous Materials Safety, MR-8: Light Rail and Freight Train Safety, and MR-13: Soil Stability and Sinkholes.

Finally, also see MR-10: Changes to Community Character and MR-20: Proximity Impacts of Relocated Freight Tracks.

387-2 The commenter's opposition to the Metro ROW alignment, and support for the Hawthorne Option, is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

387-3 Metro carefully considered the potential environmental impacts of the project in the Draft EIR. As described in Chapter 3, Environmental Impacts, of the Draft EIR, Metro analyzed potential environmental impacts to various resource areas, including air quality, noise and vibration, and transportation. Mitigation measures have been proposed to reduce or

avoid significant impacts to a less than significant level where feasible. The Metro Board will consider the conclusions of the EIR, as well as all public comments received, when deciding whether to approve the project.

Submission 388 Jennifer Chung

388-1 The commenter's support for using the Metro ROW and the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

388-2 See response to Comment 152-1.

388-3 The commenter's opposition to the Hawthorne Option is noted. All comments have been shared with the Metro Board for their consideration.

388-4 The commenter's support for the project is noted. All comments have been shared with the Metro Board for their consideration.

Submission 389 Karen

389-1 The commenter's opposition to the project in Lawndale is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives. See also MR-10: Changes to Community Character.

389-2 Metro is committed to integrating safety into all Metro rail operations. The project would comply with relevant safety standards, including the California Manual on Uniform Traffic Control Devices, the California Department of Transportation Highway Design Manual, the Americans with Disabilities Act (ADA), and Metro's Grade Crossing Safety Policy. In addition, the LPA would be fully grade-separated from all roadways, thereby avoiding potential conflicts with pedestrians or cyclists. The light rail under the Trench Option and Hawthorne Option would also be grade-separated. See MR-8: Light Rail and Freight Train Safety and MR-9: Light Rail Security.

Submission 390 Karen Ruby

390-1 The commenter's opposition to the project is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

390-2 The Draft EIR was published in 2023. Analysis was conducted from 2020 through 2022 and is based on the most recent available data. The source years of data range from the 1990s through the 2020s. The Draft EIR addresses potential impacts that could occur along the entire length of the project alignment; however, the Draft EIR does not rely upon a project-specific geotechnical investigation. Rather, the Draft EIR incorporates information from previous geotechnical studies of other projects whose study areas encompassed the project alignment. The Draft EIR also incorporates information from relevant government maps and databases, including those published by the U.S. Geological Survey and California Geological Survey. Exact dates and sources are provided in Chapter 5, References, of the Draft EIR.

Furthermore, as required by Project Feature PF-GEO-1: Metro Geotechnical Design Standards, the project would be designed and constructed consistent with the applicable standards set forth by the MRDC, including completion of a project-specific geotechnical investigation by a state-licensed civil engineer and incorporation of all recommendations contained therein. See MR-13: Soil Stability and Sinkholes for additional information.

390-3 See response to Comment 390-2.

390-4 See MR-8: Light Rail and Freight Train Safety and MR-9: Light Rail Security. As described in Chapter 2, Project Description, of the Draft EIR, the entire light rail guideway would be enclosed by physical barriers, such as fencing, soundwalls, or a combination of both, to prevent unauthorized access. In addition, CEQA does not require an analysis of safety in terms of crime, as it is not an environmental issue, and therefore the Draft EIR does not make any conclusions regarding this topic.

390-5 The commenter's opposition to the Metro ROW alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-10: Changes to Community Character.

390-6 The commenter's opposition to the Metro ROW alignment is noted. All comments have been shared with the Metro Board for their consideration.

390-7 The commenter's opposition to the Metro ROW alignment is noted. All comments have been shared with the Metro Board for their consideration.

390-8 The commenter's opposition to the Metro ROW alignment is noted. All comments have been shared with the Metro Board for their consideration.

390-9 The commenter's support for the Hawthorne Option is noted. All comments have been shared with the Metro Board for their consideration.

390-10 The project has secured funding from Measure R (2008), Measure M (2016), Transit and Intercity Rail Capital Program (TIRCP) Grant from the California State Transportation Agency Transit and Intercity Rail Capital Program, and 3% match contributions from local jurisdictions. Metro would continue to explore funding opportunities for the project.

390-11 Potential noise impacts are addressed in Section 3.6, Noise and Vibration, of the Draft EIR. The LPA significantly reduces noise impacts compared to the Elevated/At-Grade Alignment because it eliminates the at-grade crossings at 170th and 182nd Streets. The potential for LPA impacts is addressed in Chapter 4, Evaluation of Alternatives, of the Draft EIR. In addition, the project would enable the local jurisdictions along the Metro ROW to obtain a "quiet zone" designation, which would reduce existing freight noise overall along the corridor, by eliminating freight horn soundings, which typically produces noise levels of up to 110 dBA (a-weighted decibel). See MR-1: Selection of Alternatives; MR-2: Operational Noise Analysis Methodology and Impact Thresholds; MR-3: Operational Noise Project Features and Mitigation Measures; and MR-4: Potential Negative Health Effects Related to Noise, Vibration, and Air Quality.

390-12 The commenter's opposition to the Metro ROW alignment is noted. All comments have been shared with the Metro Board for their consideration.

Submission 391 Kayla Mangione

391-1 See MR-16: Response to Lawndale and Redondo Beach Community Letter.

391-2 See MR-16: Response to Lawndale and Redondo Beach Community Letter.

391-3 See MR-16: Response to Lawndale and Redondo Beach Community Letter.

Submission 392 Ken Prinzi

392-1 The commenter's opposition to the project is noted. All comments have been shared with the Metro Board for their consideration.

392-2 The 2023 Ridership Summary Report, published alongside the Draft EIR, shows that the project is expected to generate between 11,500 to 15,600 daily transit trips (boardings). Since the COVID pandemic, Metro transit ridership levels have grown every year and are nearly pre-COVID levels. See MR-15: Metro Ridership Forecasting Methodology.

392-3 The commenter's concern regarding the use of public funds is noted. The project has secured funding from Measure R (2008), Measure M (2016), TIRCP Grant from the California State Transportation Agency Transit and Intercity Rail Capital Program, and 3% match contributions from local jurisdictions. Metro is committed to the responsible use of public funds and to managing project costs efficiently, while continuing to pursue additional funding sources to support project delivery.

Metro would continue to explore funding opportunities for the project.

Submission 394 Megan

394-1 See MR-16: Response to Lawndale and Redondo Beach Community Letter.

394-2 See MR-16: Response to Lawndale and Redondo Beach Community Letter.

394-3 See MR-16: Response to Lawndale and Redondo Beach Community Letter.

394-4 See MR-16: Response to Lawndale and Redondo Beach Community Letter.

394-5 See MR-16: Response to Lawndale and Redondo Beach Community Letter.

394-6 See MR-16: Response to Lawndale and Redondo Beach Community Letter.

394-7 See MR-16: Response to Lawndale and Redondo Beach Community Letter.

Submission 395 Michael Sullivan

395-1 The commenter's opposition to implementing the project along the ROW alignment and support for the Hawthorne Option is noted. See MR-1: Selection of Alternatives. Metro puts the highest priority on public safety and security. See MR-8 Light Rail and Freight Train Safety, MR-10: Changes to Community Character, and MR-20: Proximity Impacts of Relocated Freight Tracks for additional information.

395-2 See response to Comment 395-1.

395-3 Metro has worked diligently to develop feasible and effective mitigation measures to address the potentially significant impacts of the project. See MR-10: Changes to Community Character.

395-4 See response to Comment 395-1, as well as MR-8 Light Rail and Freight Train Safety and MR-20: Proximity Impacts of Relocated Freight Tracks for additional information.

395-5 As discussed on pages 2-12 and 2-26 of the Draft EIR, freight track modifications would be necessary to implement the Metro ROW alignments. Existing freight tracks would be shifted within the Metro ROW to accommodate the light rail tracks; the distances vary depending on the location. However, the freight track modifications would not encroach into residential properties, and the project is designed to avoid displacement of residents. Additionally, the proposed freight track modifications would be completed in accordance with applicable Federal Rail Administration regulations and Metro's stringent design criteria, ensuring the new design meets modern safety requirements for both freight and light rail operations. See MR-20: Proximity Impacts of Relocated Freight Tracks. In Spring 2025, Metro conducted a survey of property boundaries, reflected in the Final EIR Appendix B, Select Advanced Conceptual Engineering Drawings - Locally Preferred Alternative. Metro would continue to coordinate with property owners as design progresses.

395-6 Potential noise impacts are addressed in Section 3.6, Noise and Vibration, of the Draft EIR. The potential for LPA impacts is addressed in Chapter 4, Evaluation of Alternatives, of the Draft EIR. See MR-2: Operational Noise Analysis Methodology and Impact Thresholds, MR-3: Operational Noise Project Features and Mitigation Measures, and MR-4: Potential Negative Health Effects Related to Noise, Vibration, and Air Quality.

395-7 See MR-6: Vibration Analysis During Final Design; MR-20: Proximity Impacts of Relocated Freight Tracks; MR-13: Soil Stability and Sinkholes; and response to Comment 396-6.

395-8 The commenter's opposition to the Metro ROW alignment is noted. All comments have been shared with the Metro Board for their consideration.

395-9 While privacy is not considered an environmental impact under CEQA, Metro understands that this may be a concern for residents, and is committed to minimizing potential intrusions where feasible. During construction, activities near residential properties, including work on the berm, would be temporary and limited to specific phases of construction. Construction contractors would adhere to standard codes of conduct to ensure professional behavior on construction sites. During operation, privacy impacts

from the light rail vehicles themselves are expected to be minimal. Trains would be in motion and would not stop or slow near residential properties, greatly limiting opportunities for riders or operators to observe private activities. In addition, light rail vehicles are generally enclosed and would be elevated or grade-separated, further reducing the potential for visual intrusion. Metro would continue to evaluate ways to minimize disruptions in accordance with applicable legal requirements and as part of the project's ongoing planning and outreach efforts.

Submission 396 Michael Sullivan

396-1 The commenter's opposition to the Metro ROW alignment is noted. While change in community character does not constitute a significant impact under CEQA, Section 3.2, Land Use, of the Draft EIR, analyzes the project's potential to physically divide communities. As discussed in these sections of the Draft EIR, the project would result in less than significant impacts. The potential for LPA impacts is addressed in Chapter 4, Evaluation of Alternatives, of the Draft EIR. See MR-10: Changes to Community Character.

396-2 Although some residents use the Metro ROW for recreational activities, this use is not authorized or compliant with freight safety standards. As described in Chapter 2, Project Description, of the Draft EIR, the Metro ROW alignments include a multi-use recreational path between Grant Avenue and 182nd Street on the east side of the light rail tracks.

396-3 As described in Chapter 2, Project Description, of the Draft EIR, the Metro ROW alignments include a multi-use recreational path between Grant Avenue and 182nd Street on the east side of the light rail tracks. The commenter's opposition to the Metro ROW alignment is noted.

396-4 See MR-10: Changes to Community Character. The project under consideration is a proposed light rail transit line, not commuter rail. Light rail systems, such as the one proposed for the project, are distinct from commuter rail in that they involve smaller, lighter vehicles, more frequent service, and lower speeds, and therefore generally result in lower levels of noise, vibration, and other environmental impacts compared to commuter rail system. See also response to Comment 396-1.

396-5 The presence of natural gas lines and petroleum pipelines, their potential impacts, and applicable regulatory requirements are addressed in Sections 3.9, Hazards and Hazardous Materials, and 3.11, Utilities and Service Systems, of the Draft EIR. Potential impacts of the LPA in this context are evaluated in Chapter 4, Evaluation of Alternatives, of the Draft EIR. In addition, Section 4.13, Corrections and Additions, of the Final EIR expands on the analysis in Section 3.9-4.2.1 of the Draft EIR by clarifying the protocols, construction techniques, regulations, and standards with which the project would comply. As detailed therein, the revisions do not change the Draft EIR's conclusion that the impact related to oil and gas pipelines would be less than significant. Train operations occur above the ground at a safe distance from pipeline and, thus, would not directly create conditions for fires and explosions. See MR-7: Utility Relocation and Hazardous Materials Safety and MR-13: Soil Stability and Sinkholes for additional information.

396-6 William Green Park is approximately 0.07 miles (350) feet from the Metro ROW. William Green Elementary School is 0.13 miles (686 feet) away, as noted in Table 3.15-9 of the Draft EIR.

396-7 See response to Comment 396-1. There are currently no legal crossings between 162nd Street and 170th Street.

396-8 The project would add new safety fencing or other barriers, such as soundwalls, to the Metro ROW. However, access across the railroad corridor would still be maintained at all existing crossings, and no evacuation routes would be eliminated.

396-9 In the previous planning stage (2018 Supplemental Alternatives Analysis), Metro studied proposed stations in the City of Lawndale between Inglewood Avenue and Manhattan Beach Boulevard along the Metro ROW and at Hawthorne Boulevard/166th Street. However, at the request of the City of Lawndale, Metro removed these proposed stations from further study.

Metro is adhering to all CEQA requirements. As of the publication of the Draft EIR in 2023, Metro has not purchased property adjacent to the Metro ROW. Furthermore, Metro's design and planning process complies with all applicable safety regulations. See MR-8: Light Rail Security.

396-10 The commenter's support for the Hawthorne Option is noted. All comments have been shared with the Metro Board for their consideration.

396-11 The comment does not raise significant environmental issues, but is noted for the record. All comments have been shared with the Metro Board for their consideration.

Submission 397 Michael Sullivan

397-1 The commenter's opposition to implementing the project along the Metro ROW alignment is noted. The commenter's request to "consider updating the DEIR to add HazMat 3.9-1.1 Federal Regulations to section to the assessment" is unclear, as the Draft EIR discusses the applicable federal regulations to which the project would be subject in Section 3.9-1.1, including the Hazardous Materials Transportation Act, cited in Submission 397. The foregoing regulations are also considered as part of the analysis of potential impacts related to hazards and hazardous materials, which is detailed in Section 3.9-4 of the Draft EIR.

See MR-7: Utility Relocation and Hazardous Materials Safety and MR-13: Soil Stability and Sinkholes for additional information.

397-2 See responses to Comments 397-3 to 397-5.

397-3 See response to Comment 397-1, as well as MR-8: Light Rail and Freight Train Safety and MR-20: Proximity Impacts of Relocated Freight Tracks.

397-4 See response to Comment 397-1.

397-5 See MR-8: Light Rail and Freight Train Safety.

397-6 Metro puts the highest priority on public safety and security. See MR-8 Light Rail and Freight Train Safety.

Submission 398 Holly Osborne

398-1 Submission 375 includes the same comments from the same commentor. See responses to Comment Letter 375.

Submission 399 can be found in Section 5.4 Responses to Groups and Organizations

Submission 400 Jeanne Bellemin

400-1 Submission 353 includes the same comments from the same commentor. See responses to Comment Letter 353.

Submission 401 Janice Tanabe

401-1 The presence of natural gas lines and petroleum pipelines, their potential impacts, and applicable regulatory requirements are addressed in Sections 3.9, Hazards and Hazardous Materials, and 3.11, Utilities and Service Systems, of the Draft EIR. Potential impacts of the LPA in this context are evaluated in Chapter 4, Evaluation of Alternatives, of the Draft EIR. In addition, Section 4.13, Corrections and Additions, of the Final EIR expands on the analysis in Section 3.9-4.2.1 of the Draft EIR by clarifying the protocols, construction techniques, regulations, and standards with which the project would comply. As detailed therein, the revisions do not change the Draft EIR's conclusion that the impact related to oil and gas pipelines would be less than significant. See MR-7: Utility Relocation and Hazardous Materials Safety, MR-8: Light Rail and Freight Train Safety, and MR-13: Soil Stability and Sinkholes for additional information.

401-2 See MR-12: Emergency Access. Similar to the Trench Option and Hawthorne Option, the LPA would fully grade separate the light rail from all roadways, and would not affect emergency access. See response to Comment 401-1.

Submission 402 Eugene Balfour

402-1 Submission 89 includes the same comments from the same commentor. See responses to Comment Letter 89.

402-2 The LPA would be fully grade-separated from all roadways, thereby avoiding potential conflicts for pedestrians and emergency vehicles. See MR-8: Light Rail and Freight Train Safety and MR-9: Light Rail Security. See MR-12: Emergency Access.

Submission 403 can be found in Section 5.4 Responses to Groups and Organizations

Submission 404 can be found in Section 5.4 Responses to Groups and Organizations

Submission 405 can be found in Section 5.4 Responses to Groups and Organizations

Submission 406 Janice Tanabe

406-1 Potential visual impacts of the Elevated/At-Grade Alignment, the Trench Option, and the Hawthorne Option are addressed in Section 3.3, Aesthetics, of the Draft EIR. The potential for LPA impacts is addressed in Chapter 4, Evaluation of Alternatives, of the Draft EIR. The analysis considers changes to visual character and quality from publicly accessible vantage points, consistent with CEQA guidelines, including changes associated with the relocation of the freight tracks and the introduction of the light rail, as well as the introduction of the light rail trains within the corridor. The relocation of freight tracks would occur within the existing Metro ROW, which is already characterized by transportation infrastructure, including freight operations. The analysis in Section 3.3-4.2 determined that while the proximity of tracks to residential and retirement communities may increase slightly, the overall change in visual character would remain consistent with the existing baseline of a transportation corridor.

See MR-10: Changes to Community Character.

Submission 407 Burch

407-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 408 Lauren Faith Niro

408-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 409 Chris Ng

409-1 The commenter's preference for the Hawthorne Option is noted. See MR-1: Selection of Alternatives. In the event the Hawthorne Option is approved for implementation by the Metro Board, Metro would work with the City of Redondo Beach to provide safe access to the South Bay Galleria. Including a pedestrian bridge at the South Bay Galleria Station would require an additional level at the station platform and vertical circulation elements at the Galleria, which would result in right-of-way acquisitions and increased cost. Transportation impacts, including those related to pedestrian safety, are analyzed in Section 3.1 of the Draft EIR.

409-2 The commenter's preference for the Trench Option as a second choice over the Elevated/At-Grade Alignment is noted. It is infeasible to put the freight train in a trench with the light rail due to cost, time, and ROW constraints. Freight has different requirements than light rail for track spacing and grades. There is insufficient space to

lower the freight tracks without causing additional significant environmental impacts, such as air quality and property impacts. Therefore, it is not feasible to put the freight tracks in a trench due to cost, time, and ROW constraints and therefore, this was not considered in the design of the Trench Option.

Submission 410 Janice Tanabe

410-1 The commenter's preference for the Hawthorne Option is noted. All comments have been shared with the Metro Board for their consideration. Metro is committed to integrating safety into all Metro rail operations.

See MR-8: Light Rail and Freight Train Safety and MR-20: Proximity Impacts of Relocated Freight Tracks for additional information.

Submission 411 Jeanne Merchant

411-1 The commenter's support for the Hawthorne Option is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

411-2 See response to Comment 411-1. All of the light rail alignment options under consideration utilize existing infrastructure in some form.

411-3 The potential for noise and vibration impacts for the Elevated/At-Grade Alignment, the Trench Option, and the Hawthorne Option are addressed in Section 3.6, Noise and Vibration, of the Draft EIR. The potential for LPA impacts is addressed in Chapter 4, Evaluation of Alternatives, of the Draft EIR. The analysis determined that with mitigation, vibration levels from the project would not exceed the thresholds that could cause structural damage during operation, see MR-5: Vibration Impact Types and Impact Thresholds. Noise impacts are also analyzed in detail. Mitigation Measures such as MM-NOI-2: Soundwalls and MM-NOI-3: Low Impact Frogs, and MM-NOI-4: Quiet Zone Implementation would be proposed to reduce noise levels to less than significant with mitigation wherever feasible. Although the Elevated/At-Grade Alignment would result in a significant and unavoidable operational noise impact, none of the other options or alternatives studied in the EIR, including the LPA, would result in significant operational noise impacts after mitigation.

Regarding visual impacts, Section 3.3, Aesthetics, evaluates potential changes to visual quality and public views. The project would be designed in accordance with Metro design criteria, which aim to integrate the project into the surrounding environment. For additional information on the issues raised in this comment and Metro's responses thereto, see MR-3: Operational Noise Project Features and Mitigation Measures; and MR-10: Changes to Community Character.

Metro understands concerns regarding property values. However, under CEQA, economic impacts such as changes in property values are not considered environmental impacts. The Draft EIR focuses on physical environmental impacts and measures to mitigate them, as required by CEQA. To address questions and concerns on property values, Metro has prepared more information. See MR-14: Property Values and Impacts to Businesses.

411-4 See response to Comment 411-1.

Submission 412 Kim Wong

412-1 The commenter's preference for the Hawthorne Option is noted. See MR-1: Selection of Alternatives. The C Line Extension, now planned to operate as the K Line, would connect to the LAX Metro Transit Station, providing service to LAX. This extension would enhance connectivity and improve access to important destinations for South Bay residents, including Redondo Beach and Torrance.

Submission 413 Angeline Souza

413-1 The project under consideration is a light rail transit line to be operated by Metro, not a heavy rail line operated by Metrolink or freight rail. Light rail vehicles are quieter, electrically powered trains that generate less noise and vibration compared to larger, diesel-operated Metrolink trains and freight operators. Regarding operational vibration impacts, those impacts were assessed in accordance with the Federal Transit Administration (FTA) Transit Noise and Vibration Impact Assessment Manual (FTA, 2018), which is the industry standard for evaluating noise and vibration impacts from transit projects. This guidance provides a well-established and widely accepted framework for determining the potential effects of noise and vibration on sensitive receptors, including residential properties. As concluded in Section 3.6, Noise and Vibration, of the Draft EIR, Mitigation Measures MM-VIB-2: Construction Equipment Location and MM-VIB-3: Pre- and Post-Construction Surveys would reduce vibration damage and annoyance impacts to less than significant levels for the LPA, Trench Option, and Hawthorne Option studied in the Draft EIR.

As indicated by the comment, Section 3.6. Noise and Vibration, of the Draft EIR, discloses that each alignment option would result in potentially significant construction-related noise and vibration impacts. To address these impacts, the project would implement Mitigation Measures MM NOI-1: Noise Control Plan, MM-VIB-1: Vibration Control Plan, MM-VIB-2: Construction Equipment Location, and MM-VIB-3: Pre- and Post- Construction Surveys. While implementation of these measures would reduce the construction noise and vibration impacts to the maximum extent feasible, some noise and vibration impacts during construction would remain significant and unavoidable. These impacts would be temporary and would cease upon the completion of construction activities.

413-2 Mitigation Measure MM-VIB-3: Pre- and Post-Construction Surveys requires contractors to document damage resulting from vibration impacts during construction and repair them. In addition, as discussed in Section 3.8, Geology and Soils, of the Draft EIR, the project design process would include thorough site geotechnical investigations to ensure the stability of nearby structures. Per Project Feature PF-GEO-1: Metro Geotechnical Design Standards, site-specific geotechnical investigations would be conducted to address foundation and structural safety. The investigation would include engineering and constructions recommendations to ensure surrounding structures are not damaged.

413-3 The noise standards used in the analysis in Section 3.6, Noise and Vibration, of the Draft EIR, are based on exterior noise levels, meaning that impacts were evaluated without

assumed closed windows or air conditioning. See MR-3: Operational Noise Project Features and Mitigation Measures and MR-4: Potential Negative Health Effects Related to Noise, Vibration, and Air Quality.

Submission 414 Angeline Souza

414-1 Submission 413 includes the same comments from the same commentor. See responses to Comment Letter 413.

Submission 415 Alan Ruiz

415-1 The commenter's support for the Hawthorne Option is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 416 Colleen M. Villegas

416-1 The commenter's opposition to the Metro ROW alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

416-2 See MR-4: Potential Negative Health Effects Related to Noise, Vibration, and Air Quality and MR-10: Changes to Community Character.

416-3 Mitigation Measure MM-VIB-3: Pre- and Post-Construction Surveys requires contractors to document damage resulting from vibration impacts during construction and repair them. In addition, as discussed in Section 3.8, Geology and Soils, of the Draft EIR, the project design process would include thorough site geotechnical investigations to ensure the stability of nearby structures. Per Project Feature PF-GEO-1: Metro Geotechnical Design Standards, site-specific geotechnical investigations would be conducted to address foundation and structural safety. The investigation would include engineering and constructions recommendations to ensure surrounding structures are not damaged. Potential noise impacts are addressed in Section 3.6, Noise and Vibration, of the Draft EIR. See MR-2: Operational Noise Analysis Methodology and Impact Thresholds, MR-3: Operational Noise Project Features and Mitigation Measures, and MR-4: Potential Negative Health Effects Related to Noise, Vibration, and Air Quality.

416-4 See responses to Comment 416-2. It is not technically feasible to correlate project-specific noise impacts to specific health outcomes, given the complexity of factors contributing to these conditions. However, with implementation of the proposed mitigation measures, noise levels associated with construction and operation of the project would be reduced.

See response to Comment 95-19 for information regarding the cited articles, which do not address light rail transit noise. See MR-4: Potential Negative Health Effects Related to Noise, Vibration, and Air Quality for information regarding health effects from noise.

Submission 417 Ints Luters

417-1 The proposed alignments along the Metro ROW, including the LPA, propose a multi-use path between 182nd Street and Grant Avenue to expand pedestrian and cycle access to the station. Vehicular drop-off would be available at the Redondo Beach Transit Center.

417-2 The commenter's support for the Metro ROW alignment and the Trench Option is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 418 Janice Tanabe

418-1 See MR-10: Changes to Community Character. The analysis in Section 3.6, Noise and Vibration, of the Draft EIR, follows federal guidance, specifically the Federal Transit Administration Transit (FTA) Noise and Vibration Impact Assessment Manual (2018) to assess transit impacts. This methodology evaluates whether projected noise and vibration levels would exceed FTA's impact thresholds for sensitive receptors. The analysis ensures a consistent, objective approach to determine potential noise impacts and identify when mitigation measures are required. See MR-2: Operational Noise Analysis Methodology and Impact Thresholds; MR-3: Operational Noise Project Features and Mitigation Measures; and MR-4: Potential Negative Health Effects Related to Noise, Vibration, and Air Quality; MR-5: Vibration Impact Types and Impact Thresholds; and MR-6: Vibration Analysis During Final Design.

Submission 419 Lillian Katzenmeyer

419-1 Metro understands the concerns of residents regarding noise, vibration, and proximity of the proposed Metro ROW light rail alignment to homes in neighborhoods, including Franklin Park. The potential for noise and vibration impacts for the Elevated/At-Grade Alignment, the Trench option, and the Hawthorne Option are addressed in Section 3.6, Noise and Vibration, of the Draft EIR. The potential for LPA impacts is addressed in Chapter 4, Evaluation of Alternatives, of the Draft EIR. See MR-1: Selection of Alternatives; MR-2: Operational Noise Analysis Methodology and Impact Thresholds; MR-3: Operational Noise Project Features and Mitigation Measures; MR-4: Potential Negative Health Effects Related to Noise, Vibration, and Air Quality; MR-5: Vibration Impact Types and Impact Thresholds; and MR-6: Vibration Analysis During Final Design. Metro has worked diligently to develop feasible and effective mitigation measures to address the potentially significant impacts of the project.

419-2 The commenter's support for the Hawthorne Option is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 420 Michael Sullivan

420-1 The presence of natural gas lines and petroleum pipelines, their potential impacts, and applicable regulatory requirements are addressed in Sections 3.9, Hazards and Hazardous Materials, and 3.11, Utilities and Service Systems, of the Draft EIR. Potential impacts of the LPA in this context are evaluated in Chapter 4, Evaluation of Alternatives, of the Draft EIR.

In addition, Section 4.13, Corrections and Additions, of the Final EIR expands on the analysis in Section 3.9-4.2.1 of the Draft EIR by clarifying the protocols, construction techniques, regulations, and standards with which the project would comply. As detailed therein, the revisions do not change the Draft EIR's conclusion that the impact related to oil and gas pipelines would be less than significant. See MR-7: Utility Relocation and Hazardous Materials Safety and MR-13: Soil Stability and Sinkholes for additional information. Routine maintenance has been factored into the cost assumptions for the project. See MR-21: Cost Estimates and Schedule.

420-2 Mitigation Measure MM-VIB-3: Pre- and Post-Construction Surveys requires contractors to document damage resulting from vibration impacts during construction and repair them. In addition, as discussed in Section 3.8, Geology and Soils, of the Draft EIR, the project design process would include thorough site geotechnical investigations to ensure the stability of nearby structures. Per Project Feature PF-GEO-1: Metro Geotechnical Design Standards, site-specific geotechnical investigations would be conducted to address foundation and structural safety. The investigation would include engineering and construction recommendations to ensure surrounding structures are not damaged.

Regarding operational vibration impacts, those impacts were assessed in accordance with the Federal Transportation (FTA) Transit Noise and Vibration Impact Assessment Manual (FTA, 2018), which is the industry standard for evaluating noise and vibration impacts from transit projects. This guidance provides a well-established and widely accepted framework for determining the potential effects of noise and vibration on sensitive receptors, including residential properties. Operational vibration annoyance impacts would be less than significant with mitigation for all Metro ROW alignments.

420-3 Section 3.8-4.7 of the Draft EIR evaluates the potential for the project to be located on expansive soil, creating a substantial direct or indirect risk to life or property. As detailed therein, Project Feature PF-GEO-1: Metro Geotechnical Design Standards would ensure that site-specific geotechnical investigations are completed to verify the potential for expansive soils and, if necessary, remediations steps to address the potential impact. See MR-13: Soil Stability and Sinkholes for additional information.

420-4 As part of the site-specific geotechnical investigations, a state-licensed civil engineer would include recommendations for addressing potential geological issues along the project alignment, including requirements for safely addressing issues related to expansive soils, if present. See MR-13: Soil Stability and Sinkholes for additional information.

420-5 Section 3.8-3.2, Local Geology, of the Draft EIR describes the geologic units underlying the RSA, which consist of Quaternary deposits composed (from the bottom to the surface) of the 1,400-foot-thick early Pleistocene-aged San Pedro formation, the 1,000-foot-thick late Pleistocene Lakewood formation and older sand dunes, and approximately 300 feet of Holocene-aged alluvium, which is capped by aeolian (i.e., wind-blown) deposits. As detailed therein, the San Pedro formation is primarily stiff clay with interbedded sand and gravel. The Lakewood formation is dense to very dense sand, clayey sand, silty sand (interbedded with very stiff to hard silty to sandy clay), and clayey silt. The Pleistocene old alluvium (map symbol Qoa) moderately consolidated, moderately dissected clay, silt, sand

and gravel, and sand dune (eolian) deposits (Qoe) are primarily composed of medium-dense to very dense, well-sorted, medium- to coarse-grained sand with some silt and silty sand. Thus, the Draft EIR acknowledges the presence of clay within the RSA. Pursuant to Project Feature PF-GEO-1: Metro Geotechnical Design Standards, site-specific geotechnical investigations would be conducted to address foundation and structural safety. The investigation would include engineering and constructions recommendations to address existing soil conditions and ensure surrounding structures are not damaged. The geotechnical report recommendations would be incorporated into the project plans and specifications, which would prevent potential impacts related to soil conditions, including clay, from occurring, should such conditions be present. See MR-13: Soil Stability and Sinkholes for additional information.

420-6 The comment is noted for the record. All comments have been shared with the Metro Board for their consideration.

Submission 421 Michael Sullivan

421-1 The commenter's opposition to the Metro ROW alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

421-2 The presence of natural gas lines and petroleum pipelines, their potential impacts, and applicable regulatory requirements are addressed in Sections 3.9, Hazards and Hazardous Materials, and 3.11, Utilities and Service Systems, of the Draft EIR. Potential impacts of the LPA in this context are evaluated in Chapter 4, Evaluation of Alternatives, of the Draft EIR. In addition, Section 4.13, Corrections and Additions, of the Final EIR expands on the analysis in Section 3.9-4.2.1 of the Draft EIR by clarifying the protocols, construction techniques, regulations, and standards with which the project would comply. As detailed therein, the revisions do not change the Draft EIR's conclusion that the impact related to oil and gas pipelines would be less than significant. See MR-7: Utility Relocation and Hazardous Materials Safety and MR-13: Soil Stability and Sinkholes.

421-3 The project under consideration is a light rail transit line to be operated by Metro, not a heavy rail line operated by Metrolink or freight rail. Light rail vehicles are quieter, electrically powered trains that generate less noise compared to larger, diesel-operated Metrolink trains and freight operators. Mitigation Measure MM-VIB-3: Pre- and Post-Construction Surveys requires contractors to document damage resulting from vibration impacts during construction and repair them. In addition, as discussed in Section 3.8, Geology and Soils, of the Draft EIR, the project design process would include thorough site geotechnical investigations to ensure the stability of nearby structures. Per Project Feature PF-GEO-1: Metro Geotechnical Design Standards, site-specific geotechnical investigations would be conducted to address foundation and structural safety. The investigation would include engineering and construction recommendations to ensure surrounding structures are not damaged.

421-4 See response to Comment 421-1. The project under consideration is a light rail transit line to be operated by Metro, not a heavy rail line operated by Metrolink or freight rail. Light

rail vehicles are quieter, electrically powered trains that generate less vibration compared to larger, diesel-operated Metrolink trains and freight operators.

421-5 See responses to Comment 421-4. As described in Section 3.6, Noise and Vibration, of the Draft EIR, the Federal Transportation Administration (FTA) has defined vibration thresholds for human annoyance and structural damage. As shown in Table 3.6-6, the threshold for vibration annoyance is 65 vibration decibels, for "frequent events." The thresholds for construction vibration damage are shown in Table 3.6-5, which expresses vibration in terms of peak particle velocity inches per second. The analysis evaluates construction vibration impacts based on these established thresholds. For operational vibration impacts, vibration impacts are assessed in terms of human annoyance, as building damage thresholds are much greater than annoyance thresholds and are typically limited to construction activities which generate higher peak vibration levels than freight or light rail trains.

421-6 The commenter's interpretation of the vibration data is inaccurate. Vibration levels were elevated at the El Nido Park measurement location for both northbound and southbound trains, indicating that the observed levels were not solely attributable to variations in train weight. For both loaded and unloaded trains, the highest vibration levels typically occurred with the passage of the locomotive, which is generally the heaviest part of the train.

As described on page 3.6-28 of the Draft EIR, the FTA general assessment methodology does not require vibration measurements. Vibration measurements were primarily conducted to collect samples of vibration generated by the existing freight train pass-bys and not as a requirement to prepare the analysis. As described on page 3.6-31, where higher vibration propagation was predicted compared to the predicted vibration levels, adjustments were made to calibrate the model such that it reflected higher vibration levels in the vicinity of El Nido Park.

The commenter's support for the Hawthorne Option is noted. All comments have been shared with the Metro Board for their consideration.

421-7 See responses to Comments 421-1 to 421-6.

Submission 422 Michael Kim

422-1 The 2023 Ridership Summary Report, published alongside the Draft EIR, shows that the project is expected to generate between 11,500 to 15,600 daily transit trips (boardings). Since the COVID pandemic, Metro transit ridership levels have grown every year and are nearly pre-COVID levels. See MR-15: Metro Ridership Forecasting Methodology.

422-2 See MR-9: Light Rail Security. In addition, CEQA does not require an analysis of safety in terms of crime, as it is not an environmental issue, and therefore the Draft EIR does not make any conclusions regarding this topic.

422-3 The commenter's opposition to the project is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 423 Phyllis Shoemaker

423-1 Submission 367 includes the same comments from the same commentor. See response to Comment Letter 367.

Submission 424 can be found in Section 5.3 Responses to Public Agencies

Submission 425 Sabrina Henriquez

425-1 See MR-16: Response to Lawndale and Redondo Beach Community Letter.

425-2 See MR-16: Response to Lawndale and Redondo Beach Community Letter.

425-3 See MR-16: Response to Lawndale and Redondo Beach Community Letter.

425-4 See MR-16: Response to Lawndale and Redondo Beach Community Letter.

425-5 See MR-16: Response to Lawndale and Redondo Beach Community Letter.

425-6 See MR-16: Response to Lawndale and Redondo Beach Community Letter.

425-7 See MR-16: Response to Lawndale and Redondo Beach Community Letter.

Submission 426 Theodore Otvos

426-1 The commenter's support for the Hawthorne Option and opposition to the Metro ROW alignment is noted. See MR-1: Selection of Alternatives. The potential for noise impacts for the Elevated/At-Grade Alignment, the Trench option, and the Hawthorne Option are addressed in Section 3.6, Noise and Vibration, of the Draft EIR. The potential for LPA impacts is addressed in Chapter 4, Evaluation of Alternatives, of the Draft EIR. See MR-2: Operational Noise Analysis Methodology and Impact Thresholds; MR-3: Operational Noise Project Features and Mitigation Measures; MR-4: Potential Negative Health Effects Related to Noise, Vibration, and Air Quality; and MR-10: Changes to Community Character.

Submission 427 Theodore Otvos

427-1 The commenter's support for the Hawthrone Option is noted. See MR-1: Selection of Alternatives. Metro has designed the project to avoid displacement of residents. See the 2025 Real Estate Acquisition Report, published concurrently with this Final EIR, for more detailed information on proposed property acquisitions. In some areas along the Metro ROW, property owners have built out past their property lines and encroached into Metro ROW.

Submission 428 Wally Marks

428-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

428-2 See MR-21: Cost Estimates and Schedule.

Submission 429 Lillian Katzenmeyer

429-1 Submission 419 includes the same comments from the same commentor. See response to Comment Letter 419.

Submission 430 Mike Jamgochian

430-1 Appendix 3.6-C shows the potential vibration impacts prior to mitigation. Mitigation measures include MM-VIB-4: Low Impact Frogs, MM-VIB-5: Resilient Fasteners, and MM-VIB-6: Ballast Mats. The use of these mitigation measures would reduce vibration at the source either by closing the gap at crossovers, securing tracks to reduce vibration, and reducing the vibration transfer from tracks to the ground. Vibration mitigation measures and locations where they would apply are included on Pages 3.6-106 through 3.6-108 of the Draft EIR. With implementation of mitigation measures, operational vibration annoyance impacts would be reduced to below the level of significance.

430-2 As described in Section 3.6, Noise and Vibration, of the Draft EIR, and Section 4.10, Corrections and Additions, of the Final EIR, all alignment options, including the LPA, would have less than significant operational vibration impacts with mitigation. See MR-1: Selection of Alternatives and MR-10: Changes to Community Character.

430-3 Metro strives to complete projects on time and within estimated budgets. See MR-21: Cost Estimates and Schedule.

430-4 CEQA requires that an EIR identify the Environmentally Superior Alternative and discuss the facts that support that selection. The EIR does not reject or dismiss the High-Frequency Bus Alternative; rather, it presents a full analysis of each alternative evaluated, including how well each alternative would meet the project's objectives. Ultimately, the decision on which alternative to approve rests with the Metro Board, who will consider both the environmental analysis and the ability of each alternative to meet the project's objectives.

430-5 The commenter's opposition to the project and support for a two-lane busway in the Metro ROW is noted. A bus line within the Metro ROW was studied in the 2009 Alternatives Analysis, and was screened out in the first phase. Implementing a busway adjacent to the active freight line had safety challenges, required a transfer at the Redondo Beach (Marine) Station, would result in localized emissions from bus vehicles, and did not provide increased ridership. A High-Frequency Bus Alternative on local arterials is discussed in Chapter 4, Evaluation of Alternatives, of the Draft EIR.

430-6 See response to Comment 430-5.

Submission 431 Daniil Kozhemyako

431-1 Metro puts the highest priority on public safety and security. Metro is committed to integrating safety into all Metro rail operations. The project would comply with relevant safety standards, including the California Manual on Uniform Traffic Control Devices, the

California Department of Transportation Highway Design Manual, the Americans with Disabilities Act (ADA), and Metro's Grade Crossing Safety Policy. The LPA, Trench Option, and Hawthorne Option would be fully grade-separated from all roadways, thereby avoiding potential conflicts with pedestrians or cyclists. See MR-8: Light Rail and Freight Train Safety and MR-9: Light Rail Security.

431-2 To clarify, the project is not a subway project. Rather, the project would extend Metro's light rail service through a combination of at-grade, trench, and aerial alignments (depending on the alignment option), none of which involves subway tunneling. Section 3.6, Noise and Vibration, of the Draft EIR evaluates the potential for noise and vibration impacts for the Elevated/At-Grade Alignment, the Trench Option, and the Hawthorne Option. The potential for LPA impacts is addressed in Chapter 4, Evaluation of Alternatives, of the Draft EIR. See MR-2: Operational Noise Analysis Methodology and Impact Thresholds; MR-3: Operational Noise Project Features and Mitigation Measures; and MR-4: Potential Negative Health Effects Related to Noise, Vibration, and Air Quality.

431-3 See response to Comment 431-2.

431-4 As described in Section 3.1, Transportation of the Draft EIR, Project Feature PF-T-1: Construction Traffic Management Plan requires contractors to develop a construction management traffic plan. The commenter does not specify which street they are concerned about, but Metro and its contractors would ensure that access to all properties would remain during construction.

431-5 Metro is committed to integrating safety into all Metro rail operations. The project would comply with relevant safety standards, including the California Manual on Uniform Traffic Control Devices, the California Department of Transportation Highway Design Manual, the Americans with Disabilities Act (ADA), and Metro's Grade Crossing Safety Policy. Under the LPA, Trench Option, and Hawthorne Option, the light rail guideway would be fully grade-separated from all roadways, thereby avoiding potential conflicts with school-age pedestrians and cyclists. The presence of a station could also benefit access to schools for residents and parents.

431-6 See response to Comment 431-1.

Submission 432 Holly Osborne

432-1 See responses to Comments 432-2 to 432-13 for specific responses to the issues raised.

432-2 The comment is correct in identifying an error in Table 3.6-16 of the Draft EIR. Due to a copy-and-paste mistake, the "Mitigated Freight and LRT Combined" column in that table incorrectly included noise levels associated with the Trench Option. The correct values, which reflect the "Mitigated Freight and LRT Combined" column should have included the numbers from the "Mitigated Freight and LRT Combined" noise levels for the Elevated/At-Grade Alignment, and are provided in Table 5 of Appendix 3.6-B. This error has been corrected in Section 4.10, Corrections and Additions, of the Final EIR. Importantly, the impact determinations in the Draft EIR were based on the correct noise levels and are accurately reflected in the "Impact Threshold" column of Table 3.6-16. As a result, the impact conclusion presented in the Draft EIR remains valid and unchanged. This correction

does not alter the EIR's analysis or deprive the public of information necessary to make informed decisions.

432-3 The measured noise levels in the "Existing" column represent real-world noise levels, which are accurately reported to the first decimal place in Appendix 3.06-B. According to the Federal Transit Administration's (FTA) Transit Noise and Vibration Impact Assessment Manual (2018), Page 95, noise impacts should be assessed by tabulating "existing ambient noise exposure (rounded to the nearest decibel) at all receivers." The rounding presented in Table 3.6-16 is thus consistent with FTA's guidance and does not affect the accuracy of the data or the conclusions of the analysis. No revisions were made to this methodology in the Final EIR.

432-4 The designation of "Significant and Unavoidable" for Cluster D29 in the Draft EIR was a copy-and-paste error. This has been corrected in Section 4.10, Corrections and Additions, of the Final EIR to reflect that the mitigated noise level of 55 dB is below the threshold of 59 dB, making the impact "Less than Significant with Mitigation." The correction does not change the overall conclusions of the Draft EIR.

432-5 The designation "Significant and Unavoidable" for Cluster D32 in the Draft EIR was a copy-and-paste error. This has been corrected in Section 4.10, Corrections and Additions, of the Final EIR to reflect that the mitigated noise level of 55 dB is below the threshold of 59 dB, making the impact "Less than Significant with Mitigation." The revision does not change the overall conclusions of the Draft EIR.

432-6 The comment is correct that Cluster D35 is appropriately designated as "Less than Significant with Mitigation," similar to Cluster D32. See response to Comment 432-5 regarding Cluster D32, the corrected designation reflects that the mitigated noise level of 55 dB is below the threshold of 59 dB. Clusters D32 and D35 are both along the ROW and have similar existing noise conditions.

432-7 See response to Comment 432-2.

432-8 The only mis-copied column in Table 3.6-16 is the "Mitigated Freight and LRT Combined" column. The impact thresholds in Table 5 in Appendix 3.6-B correctly match the impact thresholds in Table 3.6-16.

432-9 See response to Comment 432-2.

432-10 The only mis-copied column in Table 3.6-16 is the "Mitigated Freight and LRT Combined" column. The column "Unmitigated Freight and LRT Combined" in Table 5 in Appendix 3.6-B correctly matches the "Unmitigated Freight and LRT Combined" in Table 3.6-16.

432-11 The measured noise levels in the "Existing" column of Table 3.6-16 represent real-world noise levels, which are accurately reported to the first decimal place. According to the Federal Transit Administration's (FTA) Transit Noise and Vibration Impact Assessment Manual (2018), Page 95, noise impacts should be assessed by tabulating "existing ambient noise exposure (rounded to the nearest decibel) at all receivers." The rounding presented in Table 3.6-16 is thus consistent with FTA's guidance and does not affect the accuracy of

the data or the conclusions of the analysis. No revisions were made to this methodology in the Final EIR.

432-12 See responses to Comments 432-3 and 432-11 regarding the rounding of numbers. Table 3.6-17 in the Draft EIR correctly matches Table 9 in Appendix 3.6-B.

432-13 See responses to Comments 432-2 through 432-12. The presented data in Appendix 3.6-B is correct and accurate. The error that occurred in Table 3.6-16 was an incorrect copy of Trench Option Noise Levels into the Proposed Project Table. Only the "Mitigated Freight and LRT Combined" column was affected. The impacts presented in Table 3.6-16 were accurately presented and represent the Proposed Project's (Elevated/At-Grade Alignment) operational noise impacts. These impact determinations were based on the predicted "Mitigated Freight and LRT Combined" noise levels for the Elevated/At-Grade Alignment compared to the FTA noise impact criteria. The Draft EIR refers readers to the correct information on Page 3.6-50 of the Draft EIR, which included the correct Mitigated Freight and LRT Combined noise levels in Table 5 of Appendix 3.6-B. The Draft EIR has provided accurate conclusions overall.

Submission 433 Karen Reed

433-1 The commenter's preference for the Hawthorne Option is noted. See MR-1: Selection of Alternatives. See MR-10: Changes to Community Character.

The potential for noise impacts for the Elevated/At-Grade Alignment, the Trench option, and the Hawthorne Option are addressed in Section 3.6, Noise and Vibration, of the Draft EIR. The potential for LPA impacts is addressed in Chapter 4, Evaluation of Alternatives, of the Draft EIR. See MR-2: Operational Noise Analysis Methodology and Impact Thresholds; MR-3: Operational Noise Project Features and Mitigation Measures; and MR-4: Potential Negative Health Effects Related to Noise, Vibration, and Air Quality.

The potential for air quality impacts for the Elevated/At-Grade Alignment, the Trench option, and the Hawthorne Option are addressed in Section 3.4, Air Quality, of the Draft EIR. The potential for LPA impacts is addressed in Chapter 4, Evaluation of Alternatives, of the Draft EIR. Compliance with Project Features PF-AQ-1: Tier 4 Engine Standards and PF-AQ-2: Dust Control Best Practices would ensure that construction activities comply with South Coast Air Quality Management District and Metro standards controlling emissions and dust. Operationally, the light rail vehicles would be powered by electricity and would not produce localized emissions. Regional air quality would improve with implementation of the project due to a shift from passenger vehicles to light rail in the corridor.

Potential lighting impacts of the Elevated/At-Grade Alignment, the Trench option, and the Hawthorne Option are addressed in Section 3.3, Aesthetics, of the Draft EIR. The potential for LPA impacts is addressed in Chapter 4, Evaluation of Alternatives, of the Draft EIR. The Draft EIR provides an analysis of potential light and glare impacts informed by the Metro Design Standards, as stated on page 3.3-11. These standards ensure that project lighting and materials would be consistent with other Metro light rail projects currently in operation, which avoid significant light and glare impacts. Best practices, such as using non-reflective surfaces where feasible, would be incorporated to minimize glare.

Additionally, the project would comply with applicable lighting regulations, which would be verified during the permitting process and would include industry standards and/or technical lighting specification standards that are determined during the final design process.

Metro understands concerns regarding property values. However, under CEQA, economic impacts such as changes in property values are not considered environmental impacts. The Draft EIR focuses on physical environmental impacts and measures to mitigate them, as required by CEQA. To address questions and concerns on property values, Metro has prepared more information. See MR-14: Property Values and Impacts to Businesses.

433-2 Washington Elementary School and Adams Middle School are located approximately 1,200 feet from the Metro ROW. At these distances, noise from light rail operations and construction activities would be attenuated to levels below thresholds of significance due to the dissipation of sound energy over distance and the presence of intervening structures that further buffer noise. While project-related construction noise may occasionally be audible at these locations, it would not result in a substantial change from existing conditions. Similarly, vibration generated by the project during both construction and operations would have dissipated at the distances where the schools are located. The resource study areas for both noise and vibration are described in Section 3.6-2.1, Noise and Vibration, of the Draft EIR. The maximum area of analysis considered is approximately 500 feet. The schools are well outside of this distance. Additionally, as explained in Section 3.6 in the Draft EIR, the project would implement Mitigation Measures MM-NOI-2: Soundwalls and MM-NOI-3: Low Impact Frogs to reduce noise levels, and MM-NOI-4: Quiet Zone Establishment, which would collectively reduce noise levels for affected sensitive receptors (which the foregoing schools are located beyond). It should be noted that for the ROW alignments, the Draft EIR concluded that noise impacts, including to some homes within proximity to the Metro ROW, would be significant and unavoidable, even with these mitigation measures. However, for the LPA, and the Trench Option, operational noise impacts would be reduced to less than significant with mitigation.

Metro is committed to integrating safety into all Metro rail operations. The project would comply with relevant safety standards, including the California Manual on Uniform Traffic Control Devices, the California Department of Transportation Highway Design Manual, the Americans with Disabilities Act (ADA), and Metro's Grade Crossing Safety Policy. Under the LPA, Trench Option, and Hawthorne Option, the light rail guideway would be fully grade-separated from all roadways, thereby avoiding potential conflicts with pedestrians or cyclists. The presence of a station could also benefit access to schools for residents and parents. See MR-8: Light Rail and Freight Train Safety and MR-9: Light Rail Security.

As explained on page 3.1-3 of the Draft EIR, traffic delay (often measured by level of service) is no longer permissible as a CEQA impact criterion and therefore this analysis and related topics are not addressed in the Draft EIR. See MR-11: Traffic Delay and Level-of-Service and the 2023 Transportation Detail Report, published concurrently with the Draft EIR, for a discussion of traffic conditions. As noted, the LPA light rail guideway would be fully grade-separated from all roadways, and would not increase vehicle delay compared to existing conditions. In addition, as detailed by Project Feature PF-T-1: Construction

Traffic Management Plan, access would be maintained and disruptions reduced during construction.

433-3 The project would not cause changes to BNSF's freight operations. While Metro owns the ROW, BNSF has operating rights and determines operating needs and schedules. BNSF's future operations are beyond the scope of this project. As part of the project, Metro would relocate and rebuild the existing freight track. Relocated freight tracks would be replaced with newer tracks, which would provide added benefits such as efficiency and safety; however, the project does not increase the capacity of freight traffic. Contrary to the assertion of the comment, the Draft EIR discusses the frequency of freight traffic, for instance on page 4-2 of Project History.

433-4 CEQA does not require an analysis of safety in terms of crime, as it is not an environmental issue, and therefore the Draft EIR does not make any conclusions regarding this topic. However, Metro recognizes the importance of safety and security for transit users and the surrounding communities and provides the following information to clarify the existing measures in place. In June 2024, the Metro Board of Directors unanimously approved the establishment of the Metro Transit Community Public Safety Department (TCPSD). The objectives of the Metro TCPSD are increased visibility, accountability, and consistent service delivery, which would result in a safer transit system for Metro employees and customers using a specialized transit community public safety workforce who are trained specifically to address the needs of transit riders, as well as care-based strategies.

As described on Page 3.15-17 of the Draft EIR, the Los Angeles County Sherriff Department's Transit Policing Division provides contract transit policing services to the Metro public transit system. Deputies provide transit police services for both the light rail and bus transportation systems throughout 1,433 square miles, where Metro provides transit service. Los Angeles County Sherriff Department deputies conduct routine patrols of Metro facilities and transit vehicles and respond to emergency calls placed on Metro's public transit system. Police departments not contracted with Metro are also available for 9-1-1 emergency responses.

See MR-9: Light Rail Security and MR-18: Homelessness.

Submission 434 Barb Bush

434-1 The commenter's support for the Elevated/At-Grade Alignment is noted. Metro has considered retrofitting residences with sound-proofing glass as a mitigation measure for the operational noise impacts of the Elevated/At-Grade Alignment but has determined that this measure would not be feasible or appropriate because they would not reduce the exterior noise levels upon which the Draft EIR's noise impact determinations were based. As such, even with retrofitting, the identified noise levels – and thus the impact conclusion under CEQA – would remain unchanged. In addition, modern construction practices, including standard windows and insulation materials required by the California Building Code, typically reduce interior noise levels well below thresholds of concern. As such, window retrofits would not provide a measurable or necessary benefit in this context. The LPA would eliminate this impact by fully grade separating the light rail guideway from roadways.

See MR-1: Selection of Alternatives and MR-3: Operational Noise Project Features and Mitigation Measures.

434-2 The commenter's opposition to the Hawthorne Option is noted. If the Hawthorne Option were approved for implementation by the Metro Board, the mid-block crossings would be signalized, creating safer pedestrian crossings. The Redondo Beach Transit Center Station would be located adjacent to the City of Redondo Beach's new regional transit center. This would allow for convenient transfer to other local transit lines. The Hawthorne Option would run adjacent to the freeway and would not cause any conflicts or impacts to freeway operations.

434-3 The commenter's support for the Metro ROW alignment is noted. All comments have been shared with the Metro Board for their consideration.

Submission 435 can be found in Section 5.4 Responses to Groups and Organizations

Submission 436 Jay Gould

436-1 Metro understands concerns regarding property values. However, under CEQA, economic impacts such as changes in property values are not considered environmental impacts. The Draft EIR focuses on physical environmental impacts and measures to mitigate them, as required by CEQA. To address questions and concerns on property values, Metro has prepared more information. See MR-14: Property Values and Impacts to Businesses. None of the alignment options studied would result in the displacement of residential properties. The Metro Board has not yet made a final decision on whether or how to move forward with the project. See MR-1: Selection of Alternatives

Submission 437 Kimiko Shiozaki

437-1 Potential noise impacts are addressed in Section 3.6, Noise and Vibration, of the Draft EIR. Metro has considered retrofitting residences with sound-proofing glass as a mitigation measure for the operational noise impacts of the Elevated/At-Grade Alignment but has determined that this measure would not be feasible or appropriate because they would not reduce the exterior noise levels upon which the Draft EIR's noise impact determinations were based. As such, even with retrofitting, the identified noise levels – and thus the impact conclusion under CEQA – would remain unchanged. In addition, modern construction practices, including standard windows and insulation materials required by the California Building Code, typically reduce interior noise levels well below thresholds of concern. As such, window retrofits would not provide a measurable or necessary benefit in this context. The LPA would eliminate this impact by fully grade separating the light rail guideway from roadways.

In addition, the project would enable the local jurisdictions along the Metro ROW to obtain a "quiet zone" designation, which would reduce existing freight noise overall along the corridor, by eliminating freight horn soundings, which typically produces noise levels of up to 110 dBA. The operational noise impacts of the LPA would be less than significant with mitigation and further mitigation would not be required. Should the Meto Board approve the Elevated/At-Grade Alignment for implementation, it would need to

determine that the benefits of that alignment outweigh its significant environmental impacts, including the significant and unavoidable noise impact. See MR-1: Selection of Alternatives; MR-2: Operational Noise Analysis Methodology and Impact Thresholds; MR-3: Operational Noise Project Features and Mitigation Measures; and MR-4: Potential Negative Health Effects Related to Noise, Vibration, and Air Quality.

437-2 See MR-9: Light Rail Security. In addition, CEQA does not require an analysis of safety in terms of crime, as it is not an environmental issue, and therefore the Draft EIR does not make any conclusions regarding this topic.

437-3 The commenter's concern regarding the use of public funds is noted. Metro recognizes that this project is funded by taxpayer-approved measures, including Measures R and M, which were passed by Los Angeles County voters to expand and improve the region's transportation network. The project aims to close a longstanding gap in the Metro Rail system by connecting to the Metro A and E Lines, and to better connect South Bay communities to the broader regional transit system.

The Metro Board made the LPA selection with consideration to all public comments, each alternative's ability to meet the project objectives, as listed in Chapter 2, Project Description, of the Draft EIR, and other considerations, including costs. Based on these factors, the Hybrid Alternative was chosen as the LPA. See MR-1: Selection of Alternatives. However, selection of the LPA does not constitute project approval. All alternatives, including the No Project Alternative, remain under consideration until the Final EIR is certified and the Metro Board takes final action on the project.

Submission 438 Mark Nelson

438-1 Although some studies have linked excessive and unpredictable noise to stress-related health outcomes, the commenter does not provide evidence that the noise levels associated with this project would reach the intensity, frequency, or duration evaluated in those studies. As described in Section 3.6, Noise and Vibration, of the Draft EIR, the project would incorporate highly effective mitigation measures, including the installation of Mitigation Measure MM-NOI-2: Soundwalls, to reduce noise impacts to below the Federal Transportation Administration (FTA) thresholds of significance to the maximum extent feasible. Although the Elevated/At-Grade Alignment would result in a significant and unavoidable operational noise impact, the operational noise impacts of the LPA, the Trench Option and the Hawthorne Option would be less than significant with mitigation. See MR-4: Potential Negative Health Effects Related to Noise, Vibration, and Air Quality.

438-2 Metro has worked diligently to develop feasible and effective mitigation measures to address the potentially significant impacts of the project. See response to Comment 438-1 and MR-10: Changes to Community Character.

438-3 See response to Comment 438-1.

438-4 While Metro acknowledges Beach Cities Health District (BCHD) aims to promote community health, Metro cannot comment on BCHD's decisions or actions, as it is an independent entity. Therefore, questions regarding BCHD's decisions and priorities would best be directed to BCHD.

438-5 The commenter's opposition to the project in the Metro ROW is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 439 Maureen Smith

439-1 See MR-20: Proximity Impacts of Relocated Freight. The potential for operational noise impacts associated with the relocation of the freight tracks under the Elevated/At-Grade Alignment and the Trench Option is addressed in Section 3.6, Noise and Vibration, of the Draft EIR. For the LPA, this analysis is provided in Chapter 4, Evaluation of Alternatives, of the Draft EIR. As described in those sections, with implementation of mitigation, operational impacts related to freight relocation would not be significant.

Potential operational air quality impacts associated with relocation of the freight tracks under the Elevated/At-Grade Alignment and the Trench Option are addressed in Section 3.4, Air Quality, of the Draft EIR. For the LPA, these impacts are addressed in Chapter 4, Evaluation of Alternatives, of the Draft EIR. As detailed in those sections, operational air quality impacts, including impacts associated with the relocated freight operations, would be less than significant. The project would not cause direct or indirect changes in freight operations. Freight activity along the Metro ROW is expected to remain at its current level of two to four passages daily, meaning emissions from freight operations would not increase due to the project. Finally, soundwalls constructed as part of the project in certain locations would serve as physical barriers, reducing the dispersion of both air pollutants and noise beyond the Metro ROW.

439-2 While Metro does not have specific safety features for pets, as described in Chapter 2, Project Description, of the Draft EIR, the entire light rail guideway would be enclosed with physical barriers, such as fencing or soundwalls, or a combination of both, to prevent unauthorized access. See MR-8: Light Rail and Freight Train Safety.

439-3 In the previous planning stages, stations were proposed in Lawndale, including as part of the 2018 Supplemental Alternatives Analysis, but at the request of the City Lawndale were removed from consideration.

439-4 The commenter's opposition to the project in the Metro ROW is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 440 Monique Negrete-Mitchell

440-1 See MR-8: Light Rail and Freight Train Safety. Metro acknowledges the sensitivity of the workspace. See response to Comment 440-2.

440-2 The project under consideration is a light rail transit line to be operated by Metro, not a heavy rail line operated by Metrolink or freight rail. Light rail vehicles are quieter, electrically powered trains that generate less noise compared to larger diesel-operated Metrolink trains and freight operators. As described in Section 2, Project Description, of the Draft EIR, existing freight tracks would need to be shifted to accommodate light rail tracks; the distances vary depending on the location.

Section 3.6, Noise and Vibration, of the Draft EIR, identifies locations where potential operational vibration impacts related to structural damage and annoyance could occur and recommends Mitigation Measures MM-VIB-4: Low Impact Frogs through MM-VIB-6: Ballast Mats to reduce the operational annoyance impacts to less than significant with mitigation. The analysis in the Draft EIR considers both the potential shift of freight rail tracks and the addition of light rail transit (LRT) tracks. Operational vibration impacts would be reduced to less than Federal Transit Administration (FTA) impact threshold and less than significant with mitigation. Regarding potential for structural impacts during operations, see MR-5: Vibration Impact Types and Impact Thresholds. See MR-6: Vibration Analysis during Final Design.

Metro acknowledges the vibration demonstrated in the linked video created by existing freight train vibration. As described in Section 3.6, Noise and Vibration, of the Draft EIR, the analysis of operational vibration impacts followed the FTA Transit Noise and Vibration Impact Assessment Manual (FTA, 2018). The vibration levels from light rail operations would be significantly lower than those generated by freight trains, due to the lighter weight.

440-3 See MR-10: Changes to Community Character. Metro has worked diligently to develop feasible and effective mitigation measures to address the potentially significant impacts of the project. See response to Comments 440-4 through 440-9.

440-4 See MR-20: Proximity Impacts of Relocated Freight. As described in Section 2, Project Description, of the Draft EIR, existing freight tracks would need to be shifted to accommodate light rail tracks; the distances vary depending on the location. The Draft EIR acknowledges the potential for both construction and operational vibration impacts and evaluates those impacts using the methodology in the Federal Transit Administration's Transit Noise and Vibration Assessment Manual (2018), the industry standard for transit-related vibration analysis. For the Elevated/At-Grade Alignment and the Trench Alignment, this analysis of found in Section 3.6, Noise and Vibration, of the Draft EIR. For the LPA, this impact is addressed in Chapter 4, Evaluation of Alternatives, of the Draft EIR. The Draft EIR found that implementation of the identified mitigation measures, including MM-VIB-4: Low Impact Frogs, MM-VIB-5: Resilient Fasteners, and MM-VIB-6: Ballast Mats, vibration impacts from light rail operations would be reduced to less than significant with mitigation. The project is not expected to result in increased freight activity along the Metro ROW; freight operations are projected to remain at their current frequency of two to four trains per day. Therefore, while the physical location of the freight track may shift slightly, the nature and extent of freight operations, and associated vibration, would not increase as a result of the project.

Regarding construction-related vibration, the Draft EIR acknowledges that certain activities, such as pile driving and heavy equipment use, could result in temporary vibration levels that cause annoyance or discomfort for nearby residents. These impacts are addressed through Mitigation Measures MM-VIB-1: Vibration Control Plan, MM-VIB-2: Construction Equipment Location, and MM-VIB-3: Pre- and Post-Construction Surveys. These measures are designed to minimize vibration during construction and ensure that any damage to nearby structures is identified and repaired. While temporary

construction-related vibration annoyance impacts could remain significant and unavoidable, such impacts would be localized and of limited duration.

As noted in Section 3.8, Geology and Soils, the project would also incorporate site-specific geotechnical investigations (Project Feature PF-GEO-1: Metro Geotechnical Design Standards) to ensure that nearby structures remain stable and safe during construction. These investigations would include design and engineering recommendations tailored to site conditions.

Finally, the comment's suggestion that the project could not be "proven safe without the option to undo" is understood, but CEQA does not require absolute certainty. Rather, it requires a good-faith effort to evaluate reasonably foreseeable impacts and identify feasible mitigation. The Draft EIR complies with the standard and includes enforceable mitigation to reduce vibration-related impacts to the extent feasible.

440-5 The project is a light rail transit line operated by Metro and would use electrically powered light rail vehicles, which generate substantially lower vibration levels than existing freight or diesel-powered trains, such as those operated by Metrolink. As such, the operational vibration from the project would be considerably lower than the levels currently experienced with freight activity along the corridor. The Draft EIR follows the FTA's industry-standard assessment methodology and includes site-specific vibration measurements to reflect real-world conditions.

To address construction impacts, Metro would implement Mitigation Measures MM-VIB-1: Vibration Control Plan, avoid placing high-vibration equipment near homes when feasible MM-VIB-2: Construction Equipment Location, and conduct both pre- and post-construction surveys MM-VIB-3: Pre- and Post-Construction Surveys to document existing conditions and repair any construction-related damage.

In addition, Metro would conduct detailed geotechnical studies before construction (Project Feature PF-GEO-1: Metro Geotechnical Design Standards) to ensure that work is safe and responsive to the area's geological conditions. Operational vibration impacts from the light rail system would be mitigated to less than significant with mitigation, and Metro would remain accountable for monitoring impacts and enforcing mitigation throughout construction.

440-6 The commenter's interpretation of the vibration data is inaccurate. Vibration levels were elevated at the El Nido Park measurement location for both northbound and southbound trains, indicating that the observed levels were not solely attributable to variations in train weight. For both loaded and unloaded trains, the highest vibration levels typically occurred with the passage of the locomotive, which is generally the heaviest part of the train. The project under consideration is a light rail transit line to be operated by Metro, not a heavy rail line operated by Metrolink or freight rail. Light rail vehicles are quieter, electrically powered trains that generate less noise compared to larger, diesel-operated Metrolink trains and freight operators.

As described on page 3.6-28 of the Draft EIR, the FTA general assessment methodology does not require vibration measurements. However, Metro conducted vibration measurements at selected locations, including El Nido Park, to better understand baseline

conditions, including vibration generated by the existing freight train pass-bys. As described on page 3.6-31 of the Draft EIR, the vibration model was calibrated to reflect higher propagation levels observed in this area to ensure a conservative and accurate analysis.

440-7 See MR-8: Light Rail and Freight Train Safety, MR-13: Soil Stability and Sinkholes, and MR-20: Proximity Impacts of Relocated Freight Tracks.

440-8 The commenter's support for the Hawthorne Option is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

440-9 The commenter's support for the Hawthorne Option is noted. All comments have been shared with the Metro Board for their consideration.

Submission 441 Philip Breuer

441-1 The commenter's support for the Metro ROW alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

441-2 The commenter's opposition to the Hawthorne Option is noted. Section 3.3, Aesthetics, of the Draft EIR analyzes potential aesthetic impacts of the Hawthorne Option and finds them less than significant with mitigation. Regarding traffic disruptions during construction, the project is designed to minimize disruptions to the community. As part of the project, as detailed in Project Feature PF-T-1: Construction Traffic Management Plan, a detailed Construction Traffic Management Plan would manage construction-related traffic disruptions. This plan would ensure that traffic flow is managed efficiently, access to homes and businesses is maintained, and disruptions to the community are minimized.

441-3 The 2023 Ridership Summary Report, published alongside the Draft EIR, shows that the project is expected to generate between 11,500 to 15,600 daily transit trips (boardings). When the project opens, it would operate as part of the K Line, traveling north-south between the Expo/Crenshaw Station Line and the proposed station at Torrance. It would connect to the LAX/Metro Transit Station, providing service to LAX.

Submission 442 Robert Sanchez

442-1 The commenter's opposition to the project and Hawthorne Option is noted. All comments have been shared with the Metro Board for their consideration. Comments regarding costs do not raise any significant environmental issues requiring a response. See MR-1: Selection of Alternatives.

442-2 Figure 3.6-1. A-Weighted Decibel Scale and Common Noise Levels on page 3.6-2 of the Draft EIR shows noise levels from common urban sources of noise.

442-3 The comment does not raise significant environmental issues or address the adequacy of the Draft EIR and is noted for the record. All comments have been shared with the Metro Board for their consideration.

442-4 The commenter's support for the project is noted. All comments have been shared with the Metro Board for their consideration.

Submission 443 Roberto Escobar

443-1 Metro is committed to conducting meaningful outreach to ensure that all community members have the opportunity to provide input on the proposed C Line (Green) to Torrance Extension. As detailed in Appendix 1-A, NOP-Scoping Summary, of the Draft EIR and Appendix A, Public Engagement Report of the Final EIR, Metro has conducted numerous outreach efforts to gather feedback, including virtual meetings, which allowed for participation from residents who could not attend in person, as well as weekend events to accommodate varying schedules. These meetings provided important opportunities for community members to share their concerns and ask questions, and the input received has been an integral part of the planning process for this project.

The Draft EIR evaluates the potential impacts of the project, including noise, transportation, and safety concerns, and identifies mitigation measures to minimize significant impacts to less than significant where feasible. The selection of the LPA reflects a balance of community feedback, technical analysis, and cost considerations to provide a transit solution that benefits the region while addressing local concerns. The Metro Board will carefully review the Final EIR, including all public comments and responses, before making a final decision on the project's approval.

See MR-2: Operational Noise Analysis Methodology and Impact Thresholds; MR-3: Operational Noise Project Features and Mitigation Measures; MR-7: Utility Relocation and Hazardous Materials Safety; MR-8: Light Rail and Freight Train Safety; and MR-11: Traffic Delay and Level-of-Service. The Metro Board will make a decision on the project with consideration of all public comments and feedback received from public engagement.

443-2 The commenter's support for the Hawthorne Option is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

443-3 Metro would continue to engage with residents of Condon Avenue and all interested parties with regards to this project. Metro has worked diligently to develop feasible and effective mitigation measures to address the potentially significant environmental impacts of the project, including measures to minimize environmental effects within residential areas in proximity to the project. See MR-10: Changes to Community Character.

Submission 444 Sarah Straton

444-1 The project would not increase the frequency of freight trains operating in the corridor; the project is a light rail transit line with quieter, electrically powered trains. It is intended to improve regional connectivity by providing light rail service to the cities' transit centers in Redondo Beach and Torrance. See MR-10: Changes to Community Character.

The proposed use of the Metro ROW is not simply because it is available. The Metro ROW alignments evaluated in the Draft EIR were carefully selected after comprehensive analysis of multiple options, taking into consideration the project objectives and regional transit

needs. The proposed light rail would connect the Metro system to several key lines, including the Metro C, E, and K lines, which would enhance connectivity in the South Bay.

444-2 As described in Chapter 2, Project Description, of the Draft EIR, the entire light rail guideway would be enclosed by physical barriers, such as fencing, soundwalls, or a combination of both, to prevent unauthorized intrusion. Although these barriers are primarily intended to prevent humans from entering the tracks, they would also prevent or deter land animals from entering. In many areas, the existing fencing has been breached, and would be repaired under the project, which would limit unauthorized access into the Metro ROW relative to existing conditions.

See MR-8: Light Rail and Freight Train Safety.

Submission 445 Sharon

445-1 The 2023 Ridership Summary Report, published alongside the Draft EIR, shows that the project is expected to generate between 11,500 to 15,600 daily transit trips (boardings). See MR-15: Metro Ridership Forecasting Methodology.

Submission 446 A. Fierro

446-1 The commenter's support for the Metro ROW alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

446-2 The commenter's opposition to the Hawthorne Option is noted. All comments have been shared with the Metro Board for their consideration.

Submission 447 Yumiko Omatsu

447-1 The commenter's concerns about the frequency and duration of light rail operations near their home and their neighbors' homes are noted. The project is expected to operate similarly to other Metro lines, with anticipated service hours from approximately 4:00 a.m. one day to 1:00 a.m. the following day. System headways would be reduced during early morning (4:00 a.m. to 6:00 a.m.) and late-night hours (7:00 p.m. to 1:00 a.m.) to approximately 15 minutes. Peak-hour system headways would be 5 minutes during peak travel hours. Weekend system headways would be reduced compared to weekdays due to reduced commuter demand. It is important to note that light rail vehicles are electrically powered and significantly quieter than freight trains, which are currently the primary source of rail noise in the corridor. Under the LPA, and the Trench and Hawthorne Options, the light rail guideway would be fully grade-separated in this area and, with implementation of soundwalls and other noise-reducing features, would not result in significant operational noise impacts.

447-2 The concern for the Trench Open due to underground gas pipes is also noted. The presence of natural gas lines and petroleum pipelines, their potential impacts, and applicable regulatory requirements are addressed in Sections 3.9, Hazards and Hazardous Materials, and 3.11, Utilities and Service Systems, of the Draft EIR. Potential impacts of the LPA in this context are evaluated in Chapter 4, Evaluation of Alternatives, of the Draft EIR.

In addition, Section 4.13, Corrections and Additions, of the Final EIR expands on the analysis in Section 3.9-4.2.1 of the Draft EIR by clarifying the protocols, construction techniques, regulations, and standards with which the project would comply. As detailed therein, the revisions do not change the Draft EIR's conclusion that the impact related to oil and gas pipelines would be less than significant. See MR-7: Utility Relocation and Hazardous Materials Safety and MR-13: Soil Stability and Sinkholes.

447-3 The commenter's support for the Hawthorne Option is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 448 Amy LaCoe

448-1 This commenter's support for the Metro ROW alignment is noted. See MR-1: Selection of Alternatives. Section 3.1, Transportation, of the Draft EIR, addresses potential transportation impacts. As detailed by Project Feature PF-T-1: Construction Traffic Management Plan, access would be maintained and disruptions reduced during construction.

Submission 449 Jacqueline Caro

449-1 Submission 215 includes the same comments from the same commentor. See responses to Submission 215.

Submission 450 Carlos Torres

450-1 The commenter's opposition to the Metro ROW alignments and support for the Hawthorne Option is noted. See MR-1: Selection of Alternatives. The potential for noise and vibration impacts for the Elevated/At-Grade Alignment, the Trench option, and the Hawthorne Option are addressed in Section 3.6, Noise and Vibration, of the Draft EIR. The potential for LPA impacts is addressed in Chapter 4, Evaluation of Alternatives, of the Draft EIR. See MR-2: Operational Noise Analysis Methodology and Impact Thresholds; MR-3: Operational Noise Project Features and Mitigation Measures; MR-4: Potential Negative Health Effects Related to Noise, Vibration, and Air Quality; and MR-10: Changes to Community Character.

The project under consideration is a light rail transit line, not a commuter train. Light rail vehicles are quieter, electrically powered trains that generate less noise and vibration compared to larger, diesel-powered commuter trains.

Submission 451 Greg & Janett Paaske

451-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 452 Pat McLane

452-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 453 can be found in Section 5.4 Responses to Groups and Organizations

Submission 454 Anonymous

453-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 455 Henry Martinez

454-1 The commenter's support for a Metro ROW alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 456 Mark Nelson

456-1 Metro uses a standard response to email that provides additional information on the project, as not all emails received from the public are comments on the Draft EIR.

456-2 See response to Comment 438-1.

456-3 See response to Comment 438-2.

456-4 See responses to Comments 438-3 and 438-4.

456-5 See response to Comment 438-5.

Submission 457 Robert D. Stoffel

457-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 458 Nate

458-1 The commenter's support for the Hawthorne Option is noted. All comments have been shared with the Metro Board for their consideration.

Submission 459 The Olsen Family

459-1 As explained on page 3.1-3 of the Draft EIR, traffic delay (often measured by level of service) is no longer permissible as a CEQA impact criterion and therefore this analysis and related topics are not addressed in the Draft EIR. See MR-11: Traffic Delay and Level-of-Service and the 2023 Transportation Detail Report, published concurrently with the Draft

EIR, for a discussion of traffic conditions. Under the LPA, the Trench Option, and the Hawthorne Option, the light rail guideway is fully grade-separated from all roadways, and would not increase vehicle delay compared to existing conditions. In addition, as detailed by Project Feature PF-T-1: Construction Traffic Management Plan, access would be maintained and disruptions reduced during construction.

Submission 460 Rene Arreygue

460-1 The commenter's support for the Metro ROW alignment is noted. See MR-1: Selection of Alternatives. Regarding visual impacts, Section 3.3, Aesthetics, evaluates potential changes to visual quality and public views. The project would be designed in accordance with Metro design criteria, which aim to integrate the project into the surrounding environment.

Should the Hawthorne Option be pursued, it would remove approximately 20 parking spaces between 162nd and 171st Streets. Metro would work with businesses along Hawthorne Boulevard to ensure minimal disruption during construction and post construction. Refer to the 2023 Torrance Transportation Detail Report, published concurrently with the Draft EIR, for more information on parking.

Submission 461 Holly Osborne

461-1 The noise thresholds used in Section 3.6, Noise and Vibration, of Draft EIR, are consistent with the Federal Transit Administration Transit Noise and Vibration Impact Assessment Manual (2018), which establishes industry-standard criteria for evaluating noise impacts of transit projects. The thresholds take into account existing noise conditions and are not erroneously high. See MR-2: Operational Noise Analysis Methodology and Impact Thresholds.

461-2 See responses to Comments 432-1 through 432-13. Text was corrected in Section 4.10, Corrections and Additions, of the Final EIR. The correction does not change the overall conclusions of the Draft EIR.

461-3 The noise analysis in the Draft EIR follows the Federal Transit Administration (FTA) Transit Noise and Vibration Impact Assessment Manual (2018), which specifies the use of 24-hour time-averaged noise levels to assess the ambient noise environment. These levels capture all sound sources, including the occasional freight train pass-by, as part of the existing baseline. The analysis also incorporates a 10-dBA (a-weighted decibel) penalty for all sound occurring during the nighttime hours (10:00 p.m. to 7:00 a.m.) to account for increased sensitivity to noise during these hours. The effect of the penalty is that in the calculation of 24-hour noise, any event that occurs during the nighttime hours, is equivalent to 10 of the same events during the daytime hours. This ensures the assessment reflects the potential for greater disturbance from nighttime noise events.

Although noise from freight trains is loud and increases the 24-hour average noise levels, its infrequent occurrence during the day means that it does not dominate or skew the overall noise profile. Excluding the freight noise from the existing ambient noise conditions would not comply with the Federal Transportation Administration (FTA)

methodology and would misrepresent the true ambient noise environment. The 24-hour noise measurements include both periods when the freight is not operating and periods when freight is operating.

Freight train noise must be included in the study because it is part of the existing noise environment. Removing freight noise from the analysis would misrepresent existing conditions and conflict with the impact methodology set forth in the FTA Transit Noise and Vibration Impact Assessment Manual.

461-4 See response to Comment 461-3.

461-5 See response to Comment 463-3.

461-6 The receivers referred to in the Draft EIR are analytical units used to predict noise levels at representative locations for each cluster of sensitive receptors. These receivers were selected based on their ability to represent noise conditions of similar surrounding properties, considering factors such as topography, distance from the project, transit speed and other conditions that affect the noise levels. The "existing" noise levels shown in the Draft EIR are modeled values, not measured at every individual property. The values for Clusters B23 through B34 reflect consistent conditions based on their similar characteristics. See MR-2: Operational Noise Analysis Methodology and Impact Thresholds.

461-7 The commenter is correct in noting a discrepancy between the baseline noise levels assigned to Clusters B20 and B23. In the Draft EIR, Receptor B20 was associated with monitoring location LT-5, which measured a noise level of 70.0 dBA, L_{dn} (Day-Night Average Sound Levels), likely influenced by its proximity to the I-405 freeway and existing freight train activity. In contrast, Receptor B23 was linked to LT-10, which measured 55.1 dBA, L_{dn} (day-night average sound levels) and is more shielded from freeway noise.

In response to this and other similar comments, the Final EIR conservatively reassigns a baseline of 55.1 dBA L_{dn} to Clusters B17 through B22 and B47 through B52 to reflect a more uniform ambient condition along that portion of the Metro ROW. Even using this lower baseline, predicted noise levels from combined LRT and freight train operations would remain less than significant with mitigation. Thus, while the Draft EIR's assignment of baseline conditions has been refined, the conclusions regarding noise impacts remain unchanged.

The Elevated/At-Grade Alignment would implement Mitigation Measure MM-NOI-2: Soundwalls to block the line-of-sight between the train and receptors, reducing noise levels. See MR-3: Operational Noise Project Features and Mitigation Measures for more information.

461-8 See MR-2: Operational Noise Analysis Methodology and Impact Thresholds. As part of Federal Transportation Administration (FTA) guidance, existing measurements are permitted to be representative of similar sensitive receptors with similar existing noise conditions. This is fully disclosed on Page 3.6-17 of the Draft EIR under Section 3.6-2.2.1 Existing Noise Conditions.

461-9 See response to Comment 461-3.

461-10 See response to Comment 461-3. Although freight trains are loud, their infrequent daytime operation means they do not dominate the 24-hour average noise levels. Excluding freight noise from the existing ambient noise conditions would not comply with FTA methodology and would misrepresent the true ambient noise environment. The 24-hour noise measurements used in the analysis capture both periods when freight trains are operating and periods when they are not, providing a balanced and representative assessment of existing conditions.

461-11 See response to Comment 461-3.

Submission 462 Jan Tanabe

462-1 The presence of natural gas lines and petroleum pipelines, their potential impacts, and applicable regulatory requirements are addressed in Sections 3.9, Hazards and Hazardous Materials, and 3.11, Utilities and Service Systems, of the Draft EIR. Potential impacts of the LPA in this context are evaluated in Chapter 4, Evaluation of Alternatives, of the Draft EIR. In addition, Section 4.13, Corrections and Additions, of the Final EIR expands on the analysis in Section 3.9-4.2.1 of the Draft EIR by clarifying the protocols, construction techniques, regulations, and standards with which the project would comply. As detailed therein, the revisions do not change the Draft EIR's conclusion that the impact related to oil and gas pipelines would be less than significant. See MR-7: Utility Relocation and Hazardous Materials Safety, MR-8: Light Rail and Freight Train Safety, and MR-13: Soil Stability and Sinkholes for additional information.

Submission 463 Dan & Karen Pryor

463-1 The commenter's support for the Metro ROW alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 464 Tara

464-1 Submission 106 includes the same comments from the same commentor. See response to Comment Letter 106.

Submission 465 Dana Icaza

465-1 The potential for noise impacts for the Elevated/At-Grade Alignment, the Trench option, and the Hawthorne Option are addressed in Section 3.6, Noise and Vibration, of the Draft EIR. The potential for LPA impacts is addressed in Chapter 4, Evaluation of Alternatives, of the Draft EIR. See MR-2: Operational Noise Analysis Methodology and Impact Thresholds; MR-3: Operational Noise Project Features and Mitigation Measures; and MR-4: Potential Negative Health Effects Related to Noise, Vibration, and Air Quality.

465-2 The commenter's opposition to the Metro ROW alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 466 Ryan Mendivil

466-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

466-2 See MR-18: Homelessness.

Submission 467 Helen Evans

467-1 The commenter's preference for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

467-2 See MR-9: Light Rail Security and MR-18: Homelessness.

Submission 468 Jeffrey Katz

468-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

468-2 See MR-21: Cost Estimates and Schedule.

Submission 469 Angel La Canfora

469-1 The comment does not raise significant environmental issues or otherwise address the adequacy of the Draft EIR and is noted for the record. All comments have been shared with the Metro Board for their consideration.

Submission 470 Marcelo Calcagnotto

470-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 471 Adrian Rops

471-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

471-2 See response to Comment 471-1.

Submission 472 Robert Jung

472-1 The commenter's support for the Hawthorne Option is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

472-2 The terminus station at the Torrance Transit Center would allow the line to continue further south, should funding and approvals become available. Any future extensions would be subject to their own environmental review and planning processes.

Potential extensions from the Torrance Transit Center to San Pedro, Long Beach and the Los Angeles/Orange County line are included in the unfunded portion of the 2009 Metro Long Range Transportation Plan.

Submission 473 Judith and William A Hying

473-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 474 Richard Ree-Uk Kim

474-1 The commenter's preference for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

474-2 Hazardous Materials are addressed in Section 3.9, Hazards and Hazardous Materials, of the Draft EIR. See MR-7: Utility Relocation and Hazardous Materials Safety.

Submission 475 Gary Duncan

475-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

475-2 See MR-21: Cost Estimates and Schedule.

Submission 476 Debra Powers

476-1 The commenter's support for the Trench Option is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

476-2 The 2023 Ridership Summary Report, published alongside the Draft EIR, shows that the project is expected to generate between 11,500 to 15,600 daily transit trips (boardings). Since the COVID pandemic, Metro transit ridership levels have grown every year and are nearly pre-COVID levels. See MR-15: Metro Ridership Forecasting Methodology.

Submission 477 Arif I Shaikh

477-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

477-2 See response to Comment 477-1 and MR-21: Cost Estimates and Schedule.

Submission 478 Tom Hascup

478-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

478-2 The comment does not raise significant environmental issues or otherwise address the adequacy of the Draft EIR and is noted for the record. All comments have been shared with the Metro Board for their consideration.

Submission 479 Brian D. Gee

479-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 480 David Hannum

480-1 The commenter's support for the Hawthorne Option is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

480-2 See response to Comment 480-1, MR-9: Light Rail Security, and MR-18: Homelessness.

Submission 481 Mark Roulette

481-1 The commenter's support for the Trench Option as a primary choice and Elevated/At-Grade Alignment as a second choice is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

481-2 The comment does not address the adequacy of the Draft EIR and is noted for the record. All comments have been shared with the Metro Board for their consideration. Regarding health risks, see MR-4: Potential Negative Health Effects Related to Noise, Vibration, and Air Quality.

Submission 482 Phil Garner

482-1 The commenter's support for the project is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

482-2 See MR-9: Light Rail Security and MR-18: Homelessness.

Submission 483 John McLaughlin

483-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 484 Yvonne W. Zoon

484-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

484-2 Adding new stations to the project would require Metro Board direction, and they would need to be evaluated through the CEQA review process. Further analysis of the scope and schedule would be needed to develop a cost estimate. See MR-21: Cost Estimates and Schedule.

Submission 485 James Lake

485-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

485-2 Access to the trench would be restricted, and would minimize unauthorized objects or trespassers entering the right-of-way. As described in Chapter 2, Project Description, of the Draft EIR, the entire light rail guideway would be enclosed with some kind of barrier, such as fencing or a soundwall in areas where noise mitigation is proposed. Chapter 2, Project Description, of the Draft EIR also describes the trench, which would include drainage systems to adequately remove water that enters the trench to minimize the potential for water accumulation.

485-3 The commenter's opposition to the Hawthorne Option is noted. All comments have been shared with the Metro Board for their consideration.

485-4 Similar to the Hawthorne Option, the light rail guideway under the LPA and Trench Option would be fully grade-separated from all roadways. See response to Comment 485-1 and MR-8: Light Rail and Freight Train Safety.

Submission 486 Edward Miyashiro

486-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

486-2 While Metro assists in identifying potential First/Last Mile (FLM) improvements during the planning and design phases, the implementation of FLM elements, such as crosswalks, bike lanes, landscaping, and pedestrian safety enhancements, falls under the jurisdiction of the local cities. If the project is approved, Metro would coordinate with the local jurisdictions to assist in FLM planning.

The project would operate as part of the K Line, traveling north-south between the Expo/Crenshaw Station Line and the proposed station at Torrance. It would connect to the LAX/Metro Transit Station, providing service to LAX.

Submission 487 Alicia L. Baughfman

487-1 The commenter's opposition to the project is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

487-2 See Response to 487-1 and MR-9: Light Rail Security.

Submission 488 Jeff Henges

488-1 The commenter's opposition to the project is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

488-2 See response to 488-1 and MR-9: Light Rail Security.

Submission 489 Bryan Higgins

489-1 The commenter's support for the Trench Option is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

489-2 All the light rail options and alternatives evaluated in the Draft EIR, including the LPA, are grade-separated, except for the Elevated/At-Grade Alignment at two locations: 170th Street and 182nd Street, referred to in the Draft EIR as the "Proposed Project."

Submission 490 Jeff

490-1 The commenter's opposition to the project is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

490-2 See response to Comment 490-1. Potential air quality impacts are addressed in Section 3.4, Air Quality, of the Draft EIR. Operationally, the light rail vehicles would be powered by electricity and would not produce localized emissions. Section 3.6, Noise and Vibration, of the Draft EIR analyzes impacts related to noise and vibration. See MR-9: Light Rail Security and MR-18: Homelessness.

Submission 491 Brandon Pennington

491-1 The commenter's support of the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

491-2 The commenter's opposition to the Hawthorne Option is noted. The Hawthorne Option would include signalized crossings to the South Bay Galleria Station, including a new signalized crossing at the south end. As discussed in Section 3.1-4.3.2 of the Draft EIR, there would be a less than significant impact for hazards related to pedestrian access. The Hybrid Alternative has been selected as the LPA.

Submission 492 Mark Michaelian

492-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

492-2 The commenter's concerns regarding the use of public funds are noted. The Metro Board made the LPA selection with consideration to all public comments and each alternative's ability to meet the project objectives, as listed in Chapter 2, Project Description, of the Draft EIR. Based on these factors, the Hybrid Alternative was chosen as the LPA. However, this selection does not constitute project approval. All alternatives, including the No Project Alternative, remain under consideration until the Final EIR is certified and the Metro Board takes final action on the project.

The project has secured funding from Measure R (2008), Measure M (2016), Transit and Intercity Rail Capital Program (TIRCP) Grant from the California State Transportation Agency Transit and Intercity Rail Capital Program, and 3% match contributions from local jurisdictions. Metro is committed to the responsible use of public funds and to managing project costs efficiently, while continuing to pursue additional funding sources to support project delivery. See MR-21: Cost Estimates and Schedule.

Submission 493 K. Lee

493-1 The commenter's support for the Hawthorne Option is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

493-1 See response to Comment 493-1.

Submission 494 Frank Kenny

494-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

494-2 Each project option and Alternative evaluated in the Draft EIR would connect with the Metro K Line, which provides direct service to the City of Inglewood.

Submission 495 Joan Spratt

495-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

495-2 See response to Comment 495-1.

Submission 496 Allan & Stacy Holtz

496-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

496-2 See response to Comment 496-1.

Submission 497 Norman Tran

497-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

497-2 The comment is unclear.

Submission 498 Randy & Martha Shetter

498-1 The commenter's support for the Elevated/At-Grade Alignment and Trench Option is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 499 Hans G. Kuck

499-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 500 Erika Lytle

500-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

500-2 The concern for the Trench Option due to underground gas pipes is also noted. The presence of natural gas lines and petroleum pipelines, their potential impacts, and applicable regulatory requirements are addressed in Sections 3.9, Hazards and Hazardous Materials, and 3.11, Utilities and Service Systems, of the Draft EIR. Potential impacts of the LPA in this context are evaluated in Chapter 4, Evaluation of Alternatives, of the Draft EIR. In addition, Section 4.13, Corrections and Additions, of the Final EIR expands on the analysis in Section 3.9-4.2.1 of the Draft EIR by clarifying the protocols, construction techniques, regulations, and standards with which the project would comply. As detailed therein, the revisions do not change the Draft EIR's conclusion that the impact related to oil and gas pipelines would be less than significant. See MR-7: Utility Relocation and Hazardous Materials Safety and MR-13: Soil Stability and Sinkholes.

Submission 501 Esther Audrey

501-1 The commenter's support for the Elevated/At-Grade Alignment is noted. See MR-1: Selection of Alternatives. The comment requesting that Torrance Transit passes and fare rates matching the project is also noted. All comments have been shared with the Metro Board for their consideration.

Submission 502 Donald A. Oden

502-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

502-2 Before making a final determination on the project, the Metro Board will review the comments and responses included in the Final EIR and will consider multiple factors, including environmental impacts, benefits and costs.

Submission 503 Fred Ruby

503-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 504 Pamela Wilkerson

504-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

504-2 The project's northern terminus would be at the Redondo Beach (Marine) Station. As part of the project, Metro would include two new rail stations, one in the City of Redondo Beach and one in the City of Torrance.

Submission 505 Terry Butler

505-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 506 Rosa Sahara

506-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

506-2 The comment does not address the adequacy of the Draft EIR and is noted for the record. All comments have been shared with the Metro Board for their consideration.

Submission 507 Linda Hornbeck

507-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 508 Joanne Sanger

508-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

508-2 See response to Comment 508-1.

Submission 509 David Zhang

509-1 The commenter's support for the Hawthorne Option is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

509-2 Contrary to Comment 509-1, the commenter's opposition to the Hawthorne Option is noted related to traffic and cost concerns. Before making a final determination on the project, the Metro Board will review the comments and responses included in the Final EIR and will consider multiple factors, including environmental impacts, benefits and costs.

Submission 510 Rick Grefsrud

510-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

510-2 The commenter's opposition to the Trench and Hawthorne Options based on cost, schedule, and inconvenience is noted. All comments have been shared with the Metro Board for their consideration.

Submission 511 Juan Carlos Aguila, Ph.D.

511-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

511-2 The commenter's opposition to the Hawthorne Option is noted. All comments have been shared with the Metro Board for their consideration. See MR-17: Response to Torrance Community Letter.

Submission 512 Hung T. Huynh

512-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

512-2 The commenter's opposition to the Trench and Hawthorne Options based on cost and constructability is noted. All comments have been shared with the Metro Board for their consideration.

Submission 513 Christopher L. Foley

513-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 514 Max Majcher

514-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 515 Steve Chan

515-1 The commenter's opposition to the project is noted. See MR-9: Light Rail Security and MR-18: Homelessness. CEQA does not require an analysis of safety in terms of crime, as it is not an environmental issue, and therefore the Draft EIR does not make any conclusions regarding this topic.

Submission 516 Smitcha Buranasombati

516-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

516-2 The commenter's support for the most cost-efficient method is noted. Before making a final determination on the project, the Metro Board will review the comments and responses included in the Final EIR and will consider multiple factors, including environmental impacts, benefits and costs.

Submission 517 Linda Blumenthal

517-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 518 Merlin Bird

518-1 The commenter's opposition to the project has been noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 519 Jim Mills

519-1 The commenter's support for the Elevated/At-Grade Alignment and opposition to the Hawthorne option is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

519-2 The commenter's opposition to the Hawthorne Option due to community impacts and cost is noted. All comments have been shared with the Metro Board for their consideration. See MR-17: Response to Torrance Community Letter.

Submission 520 Ken Lucas

520-1 The commenter's support for the Hawthorne Option is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

520-2 The commenter's preference for the Hawthorne Option is noted Metro has proposed a multi-use recreational path between 159th and 170th Street and between Grant Avenue and 182nd Street to improve bicycle and pedestrian access. Metro would continue to engage with the community to identify opportunities for improving station access and connectivity. The Project Team would engage with the community on first/last mile planning to identify potential access improvements within a half-mile walk and three-mile cycle radius of the stations to strengthen linkages to the surrounding neighborhoods and key destinations. See MR-14: Property Values and Impacts to Businesses and MR-15: Metro Ridership Forecasting Methodology.

Submission 521 Kay Peterson

521-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

521-2 The commenter's preference for the Trench Option over the Hawthorne Option as the second choice to the Elevated/At-Grade Alignment is noted. As explained on page 3.1-3 of the Draft EIR, traffic delay (often measured by level of service) is no longer permissible as a CEQA impact criterion and therefore this analysis and related topics are not addressed in the Draft EIR. See MR-11: Traffic Delay and Level-of-Service and the 2023 Transportation Detail Report, published concurrently with the Draft EIR, for a discussion of traffic conditions. Potential air quality impacts are addressed in Section 3.4, Air Quality, of the Draft EIR. The South Bay Galleria station is included within the capital cost estimates.

Submission 522 Raymond Peterson

522-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

522-2 The commenter's opposition to the Hawthorne Option is noted. As explained on page 3.1-3 of the Draft EIR, traffic delay (often measured by level of service) is no longer permissible as a CEQA impact criterion and therefore this analysis and related topics are not addressed in the Draft EIR. See MR-11: Traffic Delay and Level-of-Service and the 2023 Transportation Detail Report, published concurrently with the Draft EIR, for a discussion of traffic conditions.

Submission 523 Terry Dunseith

523-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 524 Mark Torres

524-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

524-2 The commenter's support for the project, and opposition to the Trench Option and Hawthorne Option, is noted. All comments have been shared with the Metro Board for their consideration.

Submission 525 Sean

525-1 The commenter's support for the Elevated/At-Grade Alignment, and opposition to the Trench Option and Hawthorne Option, is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 526 William & Belinda Gonzalez

526-1 The commenter's support for the Elevated/At-Grade Alignment based on cost is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 527 Wudhidham Prachumsri

527-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

527-2 The ROW alignments would feature two new stops: one at the Redondo Beach Transit Center and the other at the Torrance Transit Center.

Submission 528 Justin Neems

528-1 The commenter's opposition to the project is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 529 Frances Koo

529-1 The commenter's support for the Elevated/At-Grade Alignment and the Trench Option is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

529-2 The Elevated/At-Grade Alignment would not reduce traffic lanes. In addition, as explained on page 3.1-3 of the Draft EIR, traffic delay (often measured by level of service) is no longer permissible as a CEQA impact criterion and therefore this analysis and related topics are not addressed in the Draft EIR. See MR-11: Traffic Delay and Level-of-Service and the 2023 Transportation Detail Report, published concurrently with the Draft EIR, for a discussion of traffic conditions.

529-3 The proposed light rail stations would comply with the Americans with Disabilities Act (ADA) and would include the necessary vertical circulation elements, such as elevators, ramps, and stairs, to ensure accessibility.

Submission 530 Anonymous

530-1 The commenter's opposition to the project is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives and MR-18: Homelessness.

Submission 531 John Farris

531-1 As explained on page 3.1-3 of the Draft EIR, traffic delay (often measured by level of service) is no longer permissible as a CEQA impact criterion and therefore this analysis and related topics are not addressed in the Draft EIR. See MR-11: Traffic Delay and Level-of-Service and the 2023 Transportation Detail Report, published concurrently with the Draft EIR, for a discussion of traffic conditions. Potential air quality impacts are addressed in Section 3.4, Air Quality, of the Draft EIR.

Submission 532 Ronald Chan

532-1 The commenter's support for the Hawthorne Option is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

532-2 Chapter 4, Evaluation of Alternatives, of the Draft EIR, evaluates a High-Frequency Bus (HFB) Alternative. Although the HFB Alternative would reduce construction and operational impacts compared to the Elevated/At-Grade Alignment, it would not realize the same level benefits from vehicle miles traveled reduction, air quality improvements, greenhouse gas emission reduction, and energy savings that would result from the light rail options.

Although Metro understands that some residents use the freight corridor for recreational activities, this use is not authorized and is not compliant with freight safety standards. The Metro ROW is not a park, but rather an active freight corridor. To enhance recreational opportunities, the project would include two multi-use recreational paths and new landscaping in areas where space allows, providing safe and accessible amenities for the community. See MR-10: Changes to Community Character.

Submission 533 Yvette Reed

533-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

533-2 The commenter's support for the most cost efficient and least disruptive option is noted. Before making a final determination on the project, the Metro Board will review the comments and responses included in the Final EIR and will consider multiple factors, including environmental impacts, benefits and costs.

Submission 534 John Farris

534-1 The commenter's perspective regarding public funding priorities is noted. The project has secured funding from Measure R (2008), Measure M (2016), Transit and Intercity Rail Capital Program (TIRCP) Grant from the California State Transportation Agency Transit and Intercity Rail Capital Program, and 3% match contributions from local jurisdictions. Metro is committed to the responsible use of public funds and to managing project costs efficiently, while continuing to pursue additional funding sources to support project delivery.

Submission 535 Joe Miyamoto

535-1 The commenter's opposition to the project is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 536 Paul Powers

536-1 The commenter's support for the Trench Option is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

536-2 The commenter's preference for the Trench Option over the Elevated/At-Grade Alignment due to fewer grade crossings and less noise is noted. All comments have been shared with the Metro Board for their consideration. The LPA light rail guideway would be fully grade-separated from all roadways.

Submission 537 Bradford Eastman

537-1 The commenter's support for the Elevated/At-Grade Alignment and the Trench Option is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

537-2 The commenter's support for the most cost efficient and least disruptive option is noted. Before making a final determination on the project, the Metro Board will review the comments and responses included in the Final EIR and will consider multiple factors, including environmental impacts, benefits and costs.

Submission 538 William

538-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 539 Alexa Frazier

539-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

539-2 The commenter's opposition to the project terminus in Torrance is noted. All comments have been shared with the Metro Board for their consideration.

Submission 540 Steven Schulz

540-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

540-2 Before making a final determination on the project, the Metro Board will review the comments and responses included in the Final EIR and will consider multiple factors, including environmental impacts, benefits and costs.

Submission 541 Liz Torres

541-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

541-2 See the Executive Summary and Chapter 2, Project Description, of the Draft EIR and the May 23, 2024, Metro Board Report, for an overview of the analysis and a description of each option. See MR-19: Project Benefits.

Submission 542 Steve Brueggeman

542-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

542-2 Before making a final determination on the project, the Metro Board will review the comments and responses included in the Final EIR and will consider multiple factors,

including environmental impacts, benefits and costs. The LPA includes a rail station that connects to the Redondo Beach and Torrance Transit Centers.

Submission 543 Dale Gereaux

543-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

543-2 Metro takes the safety and well-being of nearby communities very seriously. See MR-9: Light Rail Security.

Submission 544 Richard Mink

544-1 The commenter's support for the Elevated/At-Grade Alignment and the Trench Option is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

544-2 The comment does not address the adequacy of the Draft EIR and is noted for the record. All comments have been shared with the Metro Board for their consideration.

Submission 545 John

545-1 The commenter's support for the Hawthorne Option is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

545-2 Before making a final determination on the project, the Metro Board will review the comments and responses included in the Final EIR and will consider multiple factors, including environmental impacts, benefits and costs.

Submission 546 Chelsea

546-1 The commenter's support for the Hawthorne Option is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

546-2 The comment does not address the adequacy of the Draft EIR and is noted for the record. All comments have been shared with the Metro Board for their consideration.

Submission 547 Patrick

547-1 The commenter's support for the Hawthorne Option is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

547-2 Before making a final determination on the project, the Metro Board will review the comments and responses included in the Final EIR and will consider multiple factors, including environmental impacts, benefits and costs.

Submission 548 Maria Hernandez

548-1 The commenter's support for the Hawthorne Option is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

548-2 The City of Torrance prepared the mailer. It is unclear what aspects they deem not factual. All comments have been shared with the Metro Board for their consideration.

Submission 549 Ryan Fulton

549-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

549-2 The commenter's support for the cheapest and fastest option is noted.

Submission 550 Sylvanus Finney

550-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 551 Natalia Giacomelli

551-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 552 Cheryl Shenefield

553-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 553 Sheng Lee

553-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 554 Ben Takahash

554-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 555 Al Derago

555-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 556 Betty Derago

556-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 557 Chuck Driesler

557-1 The commenter's support for the Hawthorne Option is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 558 Dennis Bosch

558-1 The commenter's support for the Elevated/At-Grade Alignment and Trench Option is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 559 Amber Hernandez

559-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 560 Ronald Omatsu

560-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 561 Joni Owens

561-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 562 Juanita Leon

562-1 The commenter's support for the Hawthorne Option is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 563 Masashi Kawamoto

563-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 564 Michael Woodard

564-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 565 Silvy F.

565-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 566 Izzy Flores

566-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 567 Gloria Ohe

567-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 568 Jim and Laura Ackermann

568-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 569 Zachary Mayo

569-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 570 Sandy Bruce

570-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 571 Eric Barricklow

571-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 572 Yoolee Suhr

572-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 573 Michael Serafin

573-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 574 Sara Kim

574-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 575 Albert Belanger

575-1 The commenter's support for the Trench Option is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

575-2 See response to Comment 575-1.

Submission 576 Andreas

576-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 577 Marc Horton

577-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 578 Frank Tippin

578-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 579 Anthony Panipinto

579-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 580 Wm. Champlin

580-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 581 Miller

581-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 582 Philip Miyasato

582-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 583 Elaine

583-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 584 Alfonso P Gonzales

584-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 585 Makito Saito

585-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 586 Eva Gonzales

586-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 587 Cynthia Hubbard

587-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 588 Baburaji Nair

588-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 589 Donna Perkins

589-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 590 Betsy Walli Sadur

590-1 The commenter's support for the Hawthorne Option is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 591 Robert Sadur

591-1 The commenter's support for the Hawthorne Option is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 592 Bruce Yamasaki

592-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 593 Helen

593-1 The commenter's support for the Trench Option and Hawthorne Option is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 594 Jeanette Garcia

594-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 595 Erika

595-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 596 Tim Goodrich

596-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 597 Josh Hoover

597-1 The commenter's support for the Trench Option is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 598 Carl Petry

598-1 The commenter's support for the Trench Option is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 599 Keith Wicker

599-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 600 Julie Kohus

600-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 601 Soad Hakim

601-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 602 Linda Eremita

602-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 603 Phil Bahng

603-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 604 Shozo Yoshikawa

604-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 605 Hans G Kuck

605-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 606 Yared

606-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 607 John Joseph

607-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 608 Marisela Smith

608-1 The commenter's support for the Elevated/At-Grade Alignment and the Hawthorne Option is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 609 Jasper R Eanes

609-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 610 Nae Shin

610-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 611 Jing H. Chang

611-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

611-2 Before making a final determination on the project, the Metro Board will review the comments and responses included in the Final EIR and will consider multiple factors, including environmental impacts, benefits, and costs.

Submission 612 Navia Davis

612-1 The commenter's support for the Hawthorne Option is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 613 David Holmes

613-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 614 Jennifer Wesner

614-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 615 Dan Devries

615-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 616 Michael Handley

616-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 617 B. Enis

617-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 618 Zunilda Cossio

618-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 619 James Shu

619-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 620 Lawrence Lau

620-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 621 Geoff Rizzo

621-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 622 Gienda Fukunaga

622-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 623 Phillip Porush

623-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 624 John Fowler

624-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 625 Kelly Kohagura

625-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 626 Gailene Tofiga

626-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 627 Brian Mckibbin

627-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 628 Byron Jung

628-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 629 Guillaume Rouault

629-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 630 Curt Nimori

630-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 631 Ryan Lee

631-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 632 Ella Dixon

632-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 633 Gary Inouye

633-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 634 Harper Munro

634-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 635 Ilia Munro

635-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 636 Sue Cheng

636-1 The commenter's support for the Trench Option and the Hawthorne Option is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 637 Michael Daley

637-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 638 Mr. and Mrs. Senichi Sumi

638-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 639 Se Lee

639-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 640 Sunnyra Joo

640-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 641 Aldrin Hie

641-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 642 Konstantin Majarov

642-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 643 William Brown

643-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 644 Suzette Savard

644-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 645 Stella Yang

645-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 646 Han Jo Park

646-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 647 Evan Loshin

647-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 648 Janice Lee

648-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 649 Jennifer Dahm

649-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 650 Alicia Spitzer

650-1 The commenter's support for the Trench Option is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 651 John Lucas

651-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 652 Gregory S. Laurinat

652-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 653 Philip and Madonna Kielty

653-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

653-2 The commenter's preference for no light rail in their neighborhood is noted. See MR-9: Light Rail Security and MR-18: Homelessness. CEQA does not require an analysis of safety in terms of crime, as it is not an environmental issue, and therefore the Draft EIR does not make any conclusions regarding this topic.

Submission 654 Vince Long

654-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 655 Linda Zeik

655-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 656 Mary Driggs

656-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 657 Briza Covarrubias

657-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 658 Mike Dabas

658-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 659 William & Mary Stahura

659-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 660 MaryKay Rodriguez

660-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 661 Sherri Jenkins

661-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 662 Edward Fries

662-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 663 Carl D. Paquette

663-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

5.5 RESPONSES TO INDIVIDUAL COMMENTS (SUBMISSION #664 - #1326)

Submission 664 Stanley Hiroshi Wada

664-1 Submission 352 includes the same comments from the same commenter. See responses to Comment Letter 352.

664-2 See response to Comment 664-1.

664-3 See response to Comment 664-1.

664-4 See response to Comment 664-1.

664-5 See response to Comment 664-1.

664-6 See response to Comment 664-1.

664-7 See response to Comment 664-1.

Submission 665 Richard Maeda

665-1 The commenter's opposition to the project is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives; MR-9: Light Rail Security; and MR-18: Homelessness.

Submission 666 Susana Quintanar

666-1 See MR-16: Response to Lawndale and Redondo Beach Community Letter.

666-2 See MR-16: Response to Lawndale and Redondo Beach Community Letter.

666-3 See MR-16: Response to Lawndale and Redondo Beach Community Letter.

666-4 See MR-16: Response to Lawndale and Redondo Beach Community Letter.

666-5 See MR-16: Response to Lawndale and Redondo Beach Community Letter.

666-6 See MR-16: Response to Lawndale and Redondo Beach Community Letter.

666-7 See MR-16: Response to Lawndale and Redondo Beach Community Letter.

Submission 667 Carmen Reyes

667-1 See MR-16: Response to Lawndale and Redondo Beach Community Letter.

667-2 See MR-16: Response to Lawndale and Redondo Beach Community Letter.

667-3 See MR-16: Response to Lawndale and Redondo Beach Community Letter.

667-4 See MR-16: Response to Lawndale and Redondo Beach Community Letter.

667-5 See MR-16: Response to Lawndale and Redondo Beach Community Letter.

667-6 See MR-16: Response to Lawndale and Redondo Beach Community Letter.

667-7 See MR-16: Response to Lawndale and Redondo Beach Community Letter.

Submission 668 Melissa Hope

668-1 See MR-16: Response to Lawndale and Redondo Beach Community Letter.

668-2 See MR-16: Response to Lawndale and Redondo Beach Community Letter.

668-3 See MR-16: Response to Lawndale and Redondo Beach Community Letter.

668-4 See MR-16: Response to Lawndale and Redondo Beach Community Letter.

668-5 See MR-16: Response to Lawndale and Redondo Beach Community Letter.

668-6 See MR-16: Response to Lawndale and Redondo Beach Community Letter.

668-7 See MR-16: Response to Lawndale and Redondo Beach Community Letter.

Submission 669 Danny Hom

669-1 Metro is committed to ensuring that bus access is optimized, regardless of the final station locations. Metro would continue to engage with local transit providers to optimize bus access.

669-2 Metro is committed to integrating safety into all Metro rail operations. The project would comply with relevant safety standards, including the Americans with Disabilities Act (ADA). The project would provide safe and ADA-compliant access for passengers with disabilities.

Submission 670 Eric Haaland

670-1 While Metro acknowledges the advancements in automated vehicle technology, light rail was selected as the preferred mode due to its ability to provide the most benefits and its compatibility with the current Metro system. Additionally, while automated vehicle systems show promise, implementing this technology on a large scale would present significant challenges in terms of costs, feasibility, and staying within the project time frame. See MR-1: Selection of Alternatives.

Submission 671 Anna Mavromati Duncan

671-1 The commenter's opposition to the Metro ROW alignment and support for the Hawthorne Option is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

671-2 Section 3.6, Noise and Vibration, of the Draft EIR, thoroughly evaluates the potential impacts of the project, including noise and vibration, and identifies mitigation measures to

minimize significant effects wherever feasible. The LPA significantly reduces noise impacts compared to the Elevated/At-Grade Alignment because it eliminates the at-grade crossings at 170th and 182nd Streets. By grade-separating the light rail from all roadways, the LPA removes the need for audible warning at light rail crossings, such as routine train horns and crossing bells. As described in Chapter 4, Evaluation of Alternatives, of the Draft EIR, and Chapter 2, Description of the Locally Preferred Alternative, of the Final EIR, the operational noise and vibration impacts of the LPA would be comparable to those of the Trench Option and would be less than significant with mitigation. See MR-1: Selection of Alternatives; MR-3: Operational Noise Project Features and Mitigation Measures; MR-4: Potential Negative Health Effects Related to Noise, Vibration, and Air Quality; and MR-10: Changes to Community Character.

671-3 Section 3.7, Biological Resources, of the Draft EIR, analyzes the removal and replacement of trees along the Metro ROW on sensitive biological resources and determines impacts would be less than significant with mitigation. Although some trees would be removed under the Metro ROW alignment options, the Metro Tree Policy outlines Metro's commitment to protecting trees, when possible, or replacing trees removed as a result of Metro construction and maintenance. For non-heritage trees, the replacement ratio defined was two trees for every tree removed. This policy also prioritizes planting strategies that maximize the use of native species. See MR-10: Changes to Community Character. Section 4.11, Corrections and Additions, of the Final EIR has included the Metro Tree Policy as a project feature for the protection of biological resources.

671-4 The commenter's support for the Hawthorne Option is noted. All comments have been shared with the Metro Board for their consideration.

671-5 The commenter's support for the Hawthorne Option and opposition to the Metro ROW alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-8: Light Rail and Freight Train Safety and MR-10: Changes to Community Character.

Submission 672 Amy LaCoe

672-1 The commenter's support for the Metro ROW alignment and opposition to the Hawthorne Option is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 673 Rosalia Merino

673-1 Construction and operational noise is addressed in Section 3.6, Noise and Vibration, of the Draft EIR. Mitigation Measure MM-NOI-1: (Noise Control Plan) would be implemented to control noise during construction, including noise reducing measures and monitoring to ensure compliance with the Federal Transit Administration (FTA) construction noise impact criteria to the maximum extent feasible. Similarly, operational noise mitigation measures would be included to reduce noise during operations. See MR-3: Operational Noise Project Features and Mitigation Measures.

Regarding roadway access, as specified in Project Feature PF-T-1: Construction Traffic Management Plan, described in Section 3.1, Transportation, of the Draft EIR, Metro would ensure that vehicle and pedestrian access is available for all properties in proximity to the alignment. This includes worksite traffic control plans and development of alternative access routes for vehicular traffic, pedestrians, and bicyclists.

673-2 The commenter's opposition to the Metro ROW alignment and support for the Hawthorne Option is noted. All comments have been shared with the Metro Board for their consideration. See MR-10: Changes to Community Character.

673-3 The commenter's opposition to siting the project in a residential area has been noted for the record. See MR-1: Selection of Alternatives for more information on the Metro Board's selection of the Hybrid Alternative as the LPA.

Submission 674 David Mach, City of Torrance

674-1 The commenter's (Bernas) support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

674-2 See response to Comment 674-1.

674-3 The commenter's (Dianne and Jerry Baltz) support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

674-4 The commenter's (Jo Anne Naka) support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

674-5 The commenter's (Sharon I.) support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

674-6 The commenter's (Sharon I.) support for the Elevated/At-Grade Alignment and opposition to the Trench Option is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives. Visual effects of the project are addressed in Section 3.3, Aesthetics, of the Draft EIR. See MR-17: Response to Torrance Community Letter and MR-21: Cost Estimates and Schedule.

674-7 The commenter's (Susan Hale) opposition to the project is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

674-8 The commenter's (Francesco Aiello) support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

674-9 The commenter's (T. Elder) support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

674-10 The commenter's (Helen Itabashi) support for the Trench Option is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

674-11 See MR-9: Light Rail Security and MR-11: Traffic Delay and Level-of-Service.

674-12 The commenter's (Tim Calkins) support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

674-13 The commenter's (Tim Calkins) support for the Elevated/At-Grade Alignment and opposition to the Hawthorne Option is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

674-14 The commenter's (Oliver King) support for the Elevated/At-Grade Alignment and Hawthorne Option and opposition to the Trench Option is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

674-15 The commenter's (Janet Sieffent) support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

674-16 The commenter's (Federick A. Mohit) support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

674-17 The commenter's (Timothy McAtee) support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives. A minimum of 40% of all project work hours would be local hire workers as per Metro's Local Hire Initiative.

674-18 The commenter's (Anonymous) opposition to the project is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

674-19 The commenter's (Jenny Sakamoto) support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 675 can be found in Section 5.3 Responses to Public Agencies

Submission 676 Khela Guirguis

676-1 The commenter's opposition to the Metro ROW alignment and support for the Hawthorne Option is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 677 Anissa Blanco

677-1 The commenter's opposition to the Metro ROW alignment and support for the Hawthorne Option is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 678 Rari Matic

678-1 The commenter's opposition to the Metro ROW alignment and support for the Hawthorne Option is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 679 Jose Vera

679-1 The commenter's opposition to the Metro ROW alignment and support for the Hawthorne Option is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 680 Bianco Blanco

680-1 The commenter's opposition to the Metro ROW alignment and support for the Hawthorne Option is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 681 Angie Aragon

681-1 The commenter's opposition to the Metro ROW alignment and support for the Hawthorne Option is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 682 Akende Foluso

682-1 The commenter's opposition to the Metro ROW alignment and support for the Hawthorne Option is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

682-2 See response to Comment 682-1.

Submission 683 Jordi Nus Garrell

683-1 The commenter's opposition to the Metro ROW alignment and support for the Hawthorne Option is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

683-2 See response to Comment 683-1.

Submission 684 Silvestre Hidalgo

684-1 The commenter's opposition to the Metro ROW alignment and support for the Hawthorne Option is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 685 Silvestre Hidalgo

685-1 Submission 684 includes the same comments from the same commenter. See response to Comment Letter 684.

Submission 686 Anonymous

686-1 The commenter's opposition to the Metro ROW alignment and support for the Hawthorne Option is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 687 R.W. Way

687-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 688 Michael Valdez

688-1 See MR-16: Response to Lawndale and Redondo Beach Community Letter.

688-2 See MR-16: Response to Lawndale and Redondo Beach Community Letter.

688-3 See MR-16: Response to Lawndale and Redondo Beach Community Letter.

688-4 See MR-16: Response to Lawndale and Redondo Beach Community Letter.

688-5 See MR-16: Response to Lawndale and Redondo Beach Community Letter.

688-6 See MR-16: Response to Lawndale and Redondo Beach Community Letter.

688-7 See MR-16: Response to Lawndale and Redondo Beach Community Letter.

Submission 689 Victor Akende

689-1 See MR-16: Response to Lawndale and Redondo Beach Community Letter.

689-2 See MR-16: Response to Lawndale and Redondo Beach Community Letter.

689-3 See MR-16: Response to Lawndale and Redondo Beach Community Letter.

689-4 See MR-16: Response to Lawndale and Redondo Beach Community Letter.

689-5 See MR-16: Response to Lawndale and Redondo Beach Community Letter.

689-6 See MR-16: Response to Lawndale and Redondo Beach Community Letter.

689-7 See MR-16: Response to Lawndale and Redondo Beach Community Letter.

Submission 690 M. Tuckett

690-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

690-2 Pricing is standardized within the Metro Rail system. Currently one ride is $1.75 and capped at $5 a day when using the Metro TAP card. Any ride paid for by using the TAP card after spending $5 in a day on Metro fare is free. Seniors 62+, Medicare, and customers with disabilities can apply for a Reduced Fare TAP Card. With this TAP card, a reduced fare for one ride is $0.75 and is capped at $2.50 a day or $5 within seven days. More information is available at https://www.metro.net/riding/fares/seniors/.

Submission 691 Barbara J. Halligan

691-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

691-2 Chapter 2, Description of the Locally Preferred Alternative, of the Final EIR, includes an updated schedule for the LPA. See MR-21: Cost Estimates and Schedule.

Submission 692 Fred G. Richards

692-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 693 J.C & M.M. Kelly

693-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

693-2 See response to Comment 693-1. Construction impacts for the project are discussed in Chapter 3, Affected Environment and Environmental Impact Analyses, of the Draft EIR.

Submission 694 Jose A. Algire

694-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

694-2 The comment is noted for the record. All comments have been shared with the Metro Board for their consideration. All alignments studied in the Draft EIR would have similar levels of access and maintenance requirements.

Submission 695 Michael Kim

695-1 See MR-8: Light Rail and Freight Train Safety.

Metro retains qualified civil and structural engineering professionals (both in-house and contracted consultants) who have extensive experience designing and implementing complex rail infrastructure projects. Metro also coordinates closely with BNSF Railway, which operates freight service on the line, to ensure that any design and construction involving freight infrastructure meets or exceeds applicable safety criteria. Any freight track segments affected by the project would be reconstructed in compliance with applicable safety standards, including the Metro Rail Design Criteria (MRDC), California Public Utilities Commission (CPUC), and the Federal Railroad Administration (FRA) standards. It is expected that these reconstructions could be accommodated within the existing Metro ROW, with the exact configuration, including any needed design variances, to be determined as design advances with safety as the key priority. The project would not increase the frequency of freight operations on the Metro ROW. Metro also coordinates closely with BNSF Railway to ensure that any design and construction involving freight infrastructure meets or exceeds applicable safety criteria. See MR-8: Light Rail and Freight Train Safety.

695-2 See response to Comment 695-1.

Contrary to the suggestion in the comment, the project is a light rail transit system, and not a commuter rail system like Metrolink. Unlike commuter rail systems, light rail vehicles are smaller, lighter, and operate at lower speeds, with more frequent stops. These operational characteristics inherently reduce risks and potential impacts compared to heavier rail systems. As discussed in more detail in MR-8: Light Rail and Freight Train Safety, the project is and would continue to be designed to coexist safely alongside the freight line within the Metro ROW, with both systems operating independently.

695-3 The commenter's opposition to the Metro ROW alignment and support for the Hawthorne Option is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

695-4 The project involves the construction and operation of light rail trains, not freight trains. The Draft EIR does not assume any changes in freight volumes as it would be speculative. The frequency of freight operations on the Metro ROW is determined by BNSF, subject to existing agreements and applicable regulatory constraints. Metro does not control the freight train schedule or operations but coordinates with BNSF to ensure continued safe and efficient use of the Metro ROW. The Draft EIR's analysis of freight train operations is based on existing operating patterns, developed in consultation with BNSF and based on observed conditions. While BNSF has the right to operate within the Metro ROW, any substantial increase in freight traffic would require major infrastructure modifications, scheduling adjustments, and regulatory approvals (e.g., from the Federal Railroad Administration (FRA) and the California Public Utilities Code (CPUC)) that are not reasonably foreseeable at this

time. The project would replace freight tracks as needed, in kind, with newer tracks, but it would not increase track capacity. The demand for freight movement along this corridor has remained stable for years, and no changes to freight operation are anticipated.

695-5 The 2023 Ridership Summary Report, published concurrently with the Draft EIR, shows that the project is expected to generate between 11,500 to 15,600 daily transit trips (boardings). Since the COVID pandemic, Metro transit ridership levels have grown every year and are nearly at pre-COVID levels. See MR-15: Metro Ridership Forecasting Methodology.

695-6 CEQA does not require the evaluation of the impacts of the environment on the project. Safety concerns related to crime are not considered environmental issues under CEQA, and therefore the Draft EIR does not make any conclusions regarding this topic. Metro takes the safety and well-being of nearby communities very seriously. See MR-8: Light Rail and Freight Train Safety and MR-9: Light Rail Security; and MR-18: Homelessness. Regarding project funding and destinations, the C Line Extension is identified as a priority in Metro's Long Range Transportation Plan and is funded in part by voter-approved Measures R and M, which earmark funds for specific corridors. While other destinations, such as SoFi Stadium, are served or are planned to be served by other transit projects, the purpose of this project is to improve connectivity in the South Bay and provide expanded access to regional transit. See MR-1: Selection of Alternatives.

695-7 The commenter's opposition to the project is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

695-8 See MR-8: Light Rail and Freight Train Safety.

695-9 The commenter's support for the Hawthorne Option or the High-Frequency Bus Alternative is noted. As described in Chapter 4, Evaluation of Alternatives, of the Draft EIR, the High-Frequency Bus Alternative would not be within dedicated bus lanes but would be a local express service. See MR-1: Selection of Alternatives.

695-10 See response to Comment 695-6.

695-11 The commenter's opposition to the Metro ROW alignment is noted. All comments have been shared with the Metro Board for their consideration. See response to Comment 695-9.

695-12 The presence of natural gas lines and petroleum pipelines, their potential impacts, and applicable regulatory requirements are addressed in Sections 3.9, Hazards and Hazardous Materials, and 3.11 Utilities and Service System, of the Draft EIR. Potential impacts of the LPA in this context are evaluated in Chapter 4, Evaluation of Alternatives, of the Draft EIR. In addition, Section 4.13, Corrections and Additions, of the Final EIR expands on the analysis in Section 3.9-4.2.1 of the Draft EIR by clarifying the protocols, construction techniques, regulations, and standards with which the project would comply. As detailed therein, the revisions do not change the Draft EIR's conclusion that the impact related to oil and gas pipelines would be less than significant. See MR-7: Utility Relocation and Hazardous Materials and MR-8: Light Rail and Freight Train Safety.

Explosions and fires typically result from significant pipeline damage, such as a rupture or puncture, combined with an ignition source. Train operations, which occur above the

ground and at a safe distance from pipelines, do not directly create conditions for fires and explosions.

695-13 See MR-8: Light Rail and Freight Train Safety.

Submission 696 - David Mach, City of Torrance [multiple people]

696-1 The commenter's (Marian Kravitz) support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

696-2 The commenter's (Scott Wood) opposition to the project is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives and MR-9: Light Rail Security

696-3 The commenter's (Anonymous) support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

696-4 See MR-21: Cost Estimates and Schedule.

696-5 The commenter's (Shawn Denny) opposition to the project and its cost is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives and MR-21: Cost Estimates and Schedule.

696-6 The commenter's (Steve Oshiro) support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

696-7 The commenter's (W. Hamada) support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

696-8 The commenter's (Marc R. Chavez) support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

696-9 The commenter's (Jah Ja) support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

696-10 The commenter's (Robin R. Fields) support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

696-11 The commenter's (Paul Matsumoto) support for the Elevated/At-Grade Alignment and Trench Option is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

696-12 The commenter's (David Sakai) support for the Trench Option is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

696-13 The commenter's (Anonymous) support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1:

Selection of Alternatives. Regarding South Bay Green Marijuana dispensary, Metro does not have authority over South Bay Greens Marijuana Dispensary.

696-14 The commenter's (Nicki Noble) support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

696-15 The commenter's (Craig Kazin) support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

696-16 The commenter's (Janet Dirks) support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

696-17 The commenter's (L.D. Rowe) support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

696-18 The commenter's (Stan Ponegalek) support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

696-19 The commenter's (David Sakai) support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

696-20 The commenter's (Frieda Wang) support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

696-21 The commenter's (Allen Triebull) support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives and MR-21: Cost Estimates and Schedule.

Submission 697 Janette Kurth

697-1 As described in Sections 3.1-4.3 and 4.5-3.1.2 of the Draft EIR, none of the light rail alignment options or alternatives would result in significant impacts related to bicycle and pedestrian access. It should be noted that the LPA, Trench Option, and Hawthorne Option would fully grade separate light rail from all roadways, eliminating the need for light rail crossings. The freight track would remain at-grade, but the project would include new pedestrian safety infrastructure to improve safety compared to existing conditions where no pedestrian safety infrastructure often exists. See MR-1: Selection of Alternatives and MR-8: Light Rail and Freight Train Safety.

697-2 The commenter's support for the Hawthorne Option is noted. All comments have been shared with the Metro Board for their consideration. See response to Comment 697-1.

Submission 698 Colleen M. Villegas

698-1 The commenter's opposition to the Metro ROW alignment and support for the Hawthorne Option is noted. As part of the Draft EIR preparation, Metro conducted numerous field

surveys and site visits throughout the project corridor, including residential areas in Lawndale and Redondo Beach, to document existing conditions and inform the environmental analysis. See MR-1: Selection of Alternatives.

Submission 699 Suzan Hubert

699-1 Metro's Tree Policy prioritizes the use of native plants. As discussed in Section 3.7-3.5, Biological Resources, of the Draft EIR, the Metro Tree Policy outlines Metro's commitment to protecting trees, when possible, or replacing trees removed as a result of Metro construction and maintenance. For non-heritage trees, the replacement ratio is two trees for every tree removed. This policy also prioritizes planting strategies that maximize the use of native species. As described on page 3.3-2 of the Draft EIR, Metro's Tree Policy prioritizes the use of native plants. As further detailed in the project's 2023 Urban Design Report, published concurrently with the Draft EIR, Southern California native trees, shrubs and groundcovers would be selected for the project's landscaping based on site-specific conditions and micro-climates. Unique landscape colors, textures, and forms would be considered to highlight and response to the light rail station's location and its adjacent area.

Submission 700 Tri Vo

700-1 The commenter's opposition to the Metro ROW alignment and support for the Hawthorne Option is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 701 Tania Rodas

701-1 The commenter's opposition to the Metro ROW alignment and support for the Hawthorne Option is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

701-2 The commenter's opposition to siting the project within a residential area is noted. The Draft EIR evaluates potential environmental effects on the residential areas adjacent to the Metro ROW. The project would maintain all existing designated rail crossings across the Metro ROW, including at Inglewood Avenue, Manhattan Beach Boulevard, 159th, 160th, 161st, 162nd, 170th, and 182nd Streets. Notably, the LPA and Trench Option both fully grade separate light rail from streets to avoid any conflicts with pedestrians, cyclists, and vehicles. As described in Section 3.2, Land Use, of the Draft EIR, the project would not physically divide any established communities. Construction would proceed in phases and, pursuant to project feature PF-T-1 (Construction Traffic Management Plan), Metro would coordinate closely with local jurisdictions to ensure access and safety are maintained during construction. For the alignments along the Metro ROW, the light rail would be fully enclosed by fencing, soundwalls, or a combination of both, to restrict unauthorized access to the tracks and enhance safety for nearby residents. See MR-10: Changes to Community Character for more information regarding potential changes to neighborhoods.

Submission 702 Crystal McInerney

702-1 The commenter's opposition to the Metro ROW alignment and support for the Hawthorne Option is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 703 Glen Schnekenburger

703-1 The commenter's opposition to the Metro ROW alignment and support for the Hawthorne Option is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 704 Colin McGee

704-1 The commenter's opposition to the Metro ROW alignment and support for the Hawthorne Option is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

704-2 While change in community character does not constitute a significant impact under CEQA, Section 3.2, Land Use and Section 3.3, Aesthetics of the Draft EIR analyze the project's potential to physically divide communities and to affect visual quality and character. As discussed in these sections of the Draft EIR, the project would result in less than significant impacts. Noise and vibration are discussed in Section 3.6, Noise and Vibration, of the Draft EIR. Mitigation measures would be included to reduce operational noise and vibration. Although the Elevated/At-Grade Alignment would result in a significant and unavoidable operational noise impact, the operational noise impacts of the remaining light rail options and the LPA would be less than significant with mitigation See MR-2: Operational Noise Analysis Methodology; MR-3: Operational Noise Project Features and Mitigation Measures; and MR-10: Changes to Community Character.

Submission 705 Nancy Leonardo

705-1 The commenter's opposition to the Metro ROW alignment and support for the Hawthorne Option is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 706 Andy Merida

706-1 The commenter's opposition to the Metro ROW alignment and support for the Hawthorne Option is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 707 Luz Barrera

707-1 The commenter's opposition to the Metro ROW alignment and support for the Hawthorne Option is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 708 Kathy Leon

708-1 The commenter's opposition to the Metro ROW alignment and support for the Hawthorne Option is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

708-2 The LPA significantly reduces noise impacts compared to the Elevated/At-Grade Alignment because it eliminates the at-grade crossings at 170th and 182nd Streets. By grade separating the light rail from all roadways, the LPA removes the need for audible warning at light rail crossings, such as routine train horns and crossing bells and avoids conflicts with pedestrians, cyclists, and vehicles. As described in Chapter 4, Evaluation of Alternatives, of the Draft EIR, and Chapter 2, Description of the Locally Preferred Alternative, of the Final EIR, the operational noise impacts of the LPA would be comparable to those of the Trench Option and would be less than significant with mitigation. See MR-1: Selection of Alternatives; MR-3: Operational Noise Project Features and Mitigation Measures; MR-4: Potential Negative Health Effects Related to Noise, Vibration, and Air Quality; and MR-10: Changes to Community Character. Section 3.7, Biological Resources, of the Draft EIR evaluates impacts to biological resources, including wildlife. Metro does not have specific safety features for pets. As described in Chapter 2, Project Description, of the Draft EIR, the entire light rail guideway would be enclosed by physical barriers, such as fencing, soundwalls, or a combination of both, to prevent unauthorized access. Although these barriers are primarily intended to restrict human intrusion, they would also serve to deter or prevent land animals from entering the guideway. In many areas, the existing fencing has been breached, and would be repaired under the project, which would limit unauthorized access into the Metro ROW to ensure safety near operating rail.

Submission 709 Talin Gil

709-1 The commenter's opposition to the Metro ROW alignment and support for the Hawthorne Option is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

709-2 The LPA significantly reduces noise impacts compared to the Elevated/At-Grade Alignment because it eliminates the at-grade crossings at 170th and 182nd Streets. By grade separating the light rail from all roadways, the LPA removes the need for audible warning at light rail crossings, such as routine train horns and crossing bells. As described in Chapter 4, Evaluation of Alternatives, of the Draft EIR, and Chapter 2, Description of the Locally Preferred Alternative, of the Final EIR, the operational noise impacts of the LPA would be comparable to those of the Trench Option and would be less than significant with mitigation. See MR-1: Selection of Alternatives; MR-3: Operational Noise Project Features and Mitigation Measures; MR-4: Potential Negative Health Effects Related to Noise, Vibration, and Air Quality; and MR-10: Changes to Community Character.

Submission 710 Mario Alvarez

710-1 The commenter's opposition to the Metro ROW alignment and support for the Hawthorne Option is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 711 Mark Nelson

711-1 Chapter 3, Affected Environment and Environmental Impact Analyses, of the Draft EIR, analyzes impacts from the project. See the Executive Summary in the Draft EIR for a summary of the potential impacts on pages ES-1 through ES-50. See MR-4: Potential Negative Health Effects Related to Noise, Vibration, and Air Quality.

Submission 712 Ruby

712-1 The commenter's concern for environmental impacts along the Metro ROW is noted. See MR-1: Selection of Alternatives for more information on how the Metro Board selected the Hybrid Alternative as the LPA.

The Draft EIR evaluates several physical environmental topics related to the concerns implicated in this comment, including pedestrian safety (Section 3.1, Transportation), land use compatibility (Section 3.2, Land Use), visual quality (Section 3.3, Aesthetics), noise and vibration (Section 3.6, Noise and Vibration), and wildlife (Section 3.7, Biological Resources). These sections assess how the project may affect surrounding neighborhoods. Although the Elevated/At-Grade Alignment would result in a significant and unavoidable operational noise impact, none of the other alignments studied – including the LPA – would result in significant and unavoidable operational impacts. Temporary construction-related impacts would be reduced to the maximum extent feasible through implementation of mitigation measures.

See MR-10: Changes to Community Character, for additional information on these topics.

712-2 See response to Comment 712-1

712-3 See MR-8: Light Rail and Freight Train Safety.

712-4 The commenter's support for the Hawthorne Option is noted. All comments have been shared with the Metro Board for their consideration. See response to Comment 712-1.

Submission 713 Samuel Wise

713-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 714 Dana Thayer

714-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

714-2 Of all light rail options and alternatives considered, only the Hawthorne Option would remove on-street parking (approximately 20 spaces on Hawthorne Boulevard based on conceptual design).

Submission 715 Prakash Belur

715-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 716 Sang Wol Han

716-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

716-2 This comment is noted. All comments have been shared with the Metro Board for their consideration. See response to comment 716-1.

Submission 717 Isabel Guiterrez

717-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 718 Donna Minson

718-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 719 Stanley R. Kelley

719-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 720 Jack Lyons

720-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 721 Linda Crickmore

721-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

721-2 See MR-18: Homelessness.

Submission 722 Rahul Simlote

722-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 723 Jill Reed

723-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 724 Rose Stein

724-1 The commenter's support for the Hawthorne Option is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 725 Wendy Carrillo

725-2 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 726 Peter and Patricia Martini

726-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

726-2 The commenter's opposition to the Trench and Hawthorne Options is noted. All comments have been shared with the Metro Board for their consideration. See response to Comment 726-1.

Submission 727 Beth Sandoval

727-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 728 Sharon Wu

728-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 729 Seema Turner

729-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 730 Adam Garrison

730-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

730-2 The elevated Hawthorne Option would make some modifications to intersections and traffic flow but would not substantially alter traffic capacity or flow. See MR-11: Traffic Delay and Level-of-Service and the 2023 Transportation Detail Report, published concurrently with the Draft EIR, for discussion on traffic conditions.

Submission 731 Fred Peitzman

731-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

731-2 The commenter's opposition to the Hawthorne Option is noted. All comments have been shared with the Metro Board for their consideration. See response to comment 731-1.

Submission 732 Alexandros Martinez

732-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 733 Patricia Spiegel-Giglio

733-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 734 Wilson Ly

734-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 735 Joshua Gomez

735-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 736 Joseph Tevita Rocha

736-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

736-2 This commenter's opposition to the Hawthorne Option is noted. All comments have been shared with the Metro Board for their consideration. See response to Comment 736-1.

Submission 737 James Fearn

737-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 738 Jenifer Frial

738-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 739 Shauna Law

739-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 740 Jeanne Fisher

740-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 741 Jacques Monier

741-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 742 Paula Gates

742-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 743 Michael Wegnes

743-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 744 Bill Reynolds

744-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 745 N. Maas

745-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 746 Frank L. Newman Jr.

746-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

746-2 Metro is designing the terminus station at the Torrance Transit Center to allow the line to continue further south, should funding become available in the future. Potential extensions from the Torrance Transit Center to San Pedro, Long Beach, and the Los Angeles/Orange County line are included in the unfunded portion of the 2009 Metro Long Range Transportation Plan. Metro may consider these projects in the future, if additional funding becomes available.

Submission 747 Nancy Dykstra-Curtin

747-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 748 Robert Hanmer

748-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 749 Michele Kidman

749-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 750 J. Gardinale

750-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 751 David Lin

751-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 752 Mark Navarra

752-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

752-2 The commenter's opposition to the Hawthorne Option is noted. See response to Comment 752-1.

Submission 753 Annette Weisse

753-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

753-2 This comment is noted. All comments have been shared with the Metro Board for their consideration. The LPA would directly connect to the Redondo Beach and Torrance transit centers.

Submission 754 Tommy Louviere Jr.

754-1 The commenter's support for the Elevated/At-Grade Alignment is noted. See MR-1: Selection of Alternatives. You can find more about Metro's training programs and career opportunities at www.metro.net/about/careers/students/.

Submission 755 Jacqueline Cysneros

755-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 756 Anson Tran

756-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

756-2 See response to comment 756-1. As explained on page 3.1-3 of the Draft EIR, traffic delay (often measured by level of service) is no longer permissible as a CEQA impact criterion and therefore this analysis and related topics are not addressed in the Draft EIR. See MR-11: Traffic Delay and Level-of-Service and the 2023 Transportation Detail Report, published concurrently with the Draft EIR, for a discussion of traffic conditions. The LPA fully grade separates light rail from all roadways and would not increase vehicle delay compared to existing conditions.

Submission 757 Peter Nguyen

757-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

757-2 The commenter's opposition to the Hawthorne Option is noted. All comments have been shared with the Metro Board for their consideration. See response to Comment 757-1.

Submission 758 Zac Lee

758-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 759 Phat M.

759-1 The commenter's support for the Elevated/At-Grade Alignment noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives

759-2 The commenter's opposition to the Hawthorne Option is noted. See response to Comment 759-1. See MR-11: Traffic Delay and Level-of-Service and the 2023 Transportation Detail Report, published concurrently with the Draft EIR, for a discussion of traffic conditions.

Submission 760 Anne Swanson

760-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

760-2 The commenter's opposition to the Hawthorne Option is noted. As explained on page 3.1-3 of the Draft EIR, traffic delay (often measured by level of service) is no longer permissible as a CEQA impact criterion and therefore this analysis and related topics are not addressed in the Draft EIR. See MR-11: Traffic Delay and Level-of-Service and the 2023 Transportation Detail Report, published concurrently with the Draft EIR, for a discussion of traffic conditions. The LPA fully grade separates light rail from all roadways and would not increase vehicle delay compared to existing conditions.

Submission 761 Eddie Harris Jr.

761-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 762 Andrei Yermakov

762-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 763 Lilia Yermakov

763-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 764 Norberto Estrada

764-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 765 Martha Shetter

765-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

765-2 The commenter's opposition to the Hawthorne Option is noted. All comments have been shared with the Metro Board for their consideration. See response to Comment 765-1.

Submission 766 Nao Pabalan

766-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 767 Alan Pabalan

767-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 768 Randy Shetter

768-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

768-2 As described in Section 3.6, Noise and Vibration, of the Draft EIR, the project would result in significant and unavoidable noise impacts during construction for all alignment options. Mitigation Measure MM-NOI-1: Noise Control Plan would require contractors to prepare and implement a Noise Control Plan, which includes the use of quieter equipment, temporary noise barriers, and restrictions on construction hours to reduce noise exposure to below the Federal Transit Administration's (FTA) construction noise criteria to the maximum extent feasible. Construction activities would also be phased and would not occur continuously in any one location for the full construction period.

With respect to long-term operational noise, the Draft EIR finds that only the Elevated/At-Grade Alignment would result in a significant and unavoidable operational noise impact. Operational noise impacts of the Trench Option, Hawthorne Option, and the LPA would be less than significant with mitigation.

Metro understands concerns regarding property values. However, under CEQA, economic impacts such as changes in property values are not considered environmental impacts. The Draft EIR focuses on physical environmental impacts and measures to mitigate them, as required by CEQA. To address questions and concerns on property values, Metro has prepared more information. MR-14: Property Values and Impacts to Businesses. Also see MR-10: Changes to Community Character.

768-3 See response to Comment 768-2. Although construction related noise and vibration impacts of each alignment option studied in the Draft EIR would be significant and unavoidable, the operational noise and vibration impacts of the Hawthorne Option would be less than significant with mitigation. Soundwalls would be installed in areas where noise levels are predicted to exceed FTA noise impact criteria for residences, as required by Mitigation Measure MM-NOI-2: Soundwalls. These soundwalls would block the line-of-sight between the light rail train and sensitive receptors, reducing noise impacts. See MR-3: Operational Noise Project Features and Mitigation Measures. See Section 3.6-6, Project Impacts Remaining After Mitigation, of the Draft EIR, for further detail about these impact conclusions.

768-4 The commenter's support for the Metro ROW alignment and opposition to the Hawthorne Option is noted. All comments have been shared with the Metro Board for their consideration. The City of Redondo Beach's transit center opened in January 2023.

768-5 As described in Section 3.1, Transportation, of the Draft EIR, Project Feature PF-T-1 requires contractors to develop a Construction Traffic Management Plan (CTMP), which would include coordination with local businesses and residents as well as relevant jurisdictions to manage access and the effects of temporary closures and identify reasonable accommodations or alternatives, which could include limiting construction hours, providing alternate routes or temporary easements, or other strategies. As discussed, beginning on

Page 3.1-50, construction of the Hawthorne Option would be staged to minimize traffic disruption. See MR-11: Traffic Delay and Level of Service and the 2023 Transportation Detail Report, published concurrently with the Draft EIR.

The Hawthorne Option would require permanent property acquisitions, as shown in the 2023 Real Estate Acquisitions Report, published concurrently with the Draft EIR. These permanent property acquisitions are primarily located where the alignment transitions in a few areas: from the Metro ROW to alongside the I-405, from the I-405 to Hawthorne Boulevard and back to the Metro ROW near 190th Street.

768-6 CEQA does not require an analysis of safety in terms of crime, as it is not an environmental issue, and therefore the Draft EIR does not make any conclusions regarding this topic. Metro takes the safety and well-being of nearby communities very seriously. See MR-9: Light Rail Security.

768-7 This commenter's opposition to the Hawthorne Option is noted. The project has secured funding from Measure R (2008), Measure M (2016), TIRCP Grant from the California State Transportation Agency (CALSTA) Transit and Intercity Rail Capital Program, and 3% match contributions from local jurisdictions. Metro is committed to the responsible use of public funds and to managing project costs efficiently, while continuing to pursue additional funding sources to support project delivery.

Submission 769 Jason Nishiyama

769-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 770 David Cobb

770-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

770-2 This comment is noted. All comments have been shared with the Metro Board for their consideration. See response to comment 770-1.

Submission 771 Devin Valdez

771-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

771-2 See response to comment 771-1. The Elevated/At-Grade Alignment is the only option in the Metro ROW that would include at-grade light rail crossings. The LPA and the Trench Option would fully grade separate light rail from traffic.

Submission 772 Jordyn Kieft

772-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. The LPA, Trench Option, and Hawthorne Option light rail guideways are all fully grade-separated from the roadway network, and trains would not conflict with intersections. See MR-1: Selection of Alternatives.

Submission 773 Jacqueline Ecklund

773-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 774 Tiffany Lopez

774-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 775 Lita Garcia

775-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 776 Melanie Drieke

776-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 777 Christopher Drieke

777-1 The commenter's support for the Elevated/At-Grade Alignment is noted. See MR-1: Selection of Alternatives. Per the commenter's note about their preference to save taxpayer dollars, the project has secured funding from Measure R (2008), Measure M (2016), a Transit and Intercity Rail Capital Program (TIRCP) Grant from the California State Transportation Agency (CALSTA) Transit and Intercity Rail Capital Program, and 3% match contributions from local jurisdictions. Metro is committed to the responsible use of public funds and to managing project costs efficiently, while continuing to pursue additional funding sources to support project delivery.

Submission 778 Rosa Fontana

778-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 779 Victoria Parrish

779-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 780 Abdulvahob Nabiev

780-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 781 MD Smith

781-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

781-2 The commenter's opinion regarding cost efficiency is noted. Cost efficiency is one of the objectives on which the Metro Board made its LPA selection. Metro strives to complete projects on time and within estimated budgets.

Submission 782 Hunter White

782-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 783 Mary Napoleone

783-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 784 Kristina Scruggs

784-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 785 James Ecklund

785-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 786 John Flanagan

786-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 787 Stefan Ecklund

787-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 788 Stephanie Ishioka

788-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

788-2 See response to Comment 788-1. Under CEQA, economic effects, such as financial effects on businesses, are not considered environmental effects. Metro has created a Business Interruption Fund for major rail projects under construction in Los Angeles County to support the business community.

Submission 789 Carl Paquette

789-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 790 Sandra Jo Williamson

790-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

790-2 The commenter's opposition to the project and secondary support for the Metro ROW alignment are noted. All comments have been shared with the Metro Board for their consideration.

Submission 791 Dennis Piotrowski

791-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

791-2 The commenter's support for the Metro ROW alignment and opposition to the Hawthorne Option is noted. All comments have been shared with the Metro Board for their consideration.

Submission 792 Elisabeth Bailly

792-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

792-2 The commenter's support for the Metro ROW alignment and opposition to the Hawthorne Option is noted. Under CEQA, financial effects on businesses are not considered environmental effects. Metro has created a Business Interruption Fund for major rail projects under construction in Los Angeles County to support the business community. As explained on page 3.1-3 of the Draft EIR, traffic delay (often measured by level of service) is no longer permissible as a CEQA impact criterion and therefore this analysis and related topics are not addressed in the Draft EIR. See MR-11: Traffic Delay and Level-of-Service and the 2023 Transportation Detail Report, published concurrently with the Draft EIR, for a discussion of traffic conditions. The LPA, Trench Option, and Hawthorne Option fully grade separates light rail from all roadways and would not increase vehicle delay compared to existing conditions. Under CEQA, economic impacts, such as financial effects on businesses, are not considered environmental effects. Metro has created a Business Interruption Fund for major rail projects under construction in Los Angeles County to support the business community.

Submission 793 William Champlin

793-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 794 Tiffany Jones

794-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 795 Stephanie Cati

795-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

795-2 The commenters' support for transit is noted. As indicated in Section 3.1-4.2.2 of the Draft EIR, each of the alignments under consideration would have a neutral or beneficial effect on vehicle miles traveled. See also MR-11: Traffic Delay and Level of Service. Under the LPA, Trench Option, and Hawthorne Option, the light rail would be grade-separated from all roadways. For the LPA and Trench Option, this means that vehicle delay would not increase compared to existing conditions. Under the Hawthorne Option, however, changes in traffic signals and roadway modifications could affect circulation pattern, as detailed in MR-11 and the 2023 Transportation Detail Report, published concurrently with the Draft EIR.

Submission 796 Kevin Hernandez

796-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 797 Joan Hardy

797-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 798 Erika Hatzenbuhler

798-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

798-2 The commenter's opposition to the Hawthorne Option is noted. All comments have been shared with the Metro Board for their consideration. See response to Comment 798-1.

Submission 799 Glenn Hatzenbuhler

799-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 800 Jeff Earnest

800-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

800-2 See response to Comment 800-1. Before making a final determination on the project, the Metro Board will review the comments and responses included in the Final EIR and will consider multiple factors, including environmental impacts, benefits, and costs.

Submission 801 Susan Earnest

801-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 802 Daniel Lim

802-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 803 Daniel Gonzalez

803-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 804 Alison Brown

804-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 805 Aqsha Munshi

805-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 806 Aamir Kuriswala

806-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 807 Cornelius Fong

807-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 808 Richard Krason

808-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 809 Leonarda Krason

809-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 810 Felisha Black

810-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 811 Aguilar

811-1 The commenter's support for the Elevated/At-Grade Alignment is noted, as well as support for more buses. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 812 Daniel Schwartz

812-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 813 Thomas Shigemitsu

813-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 814 Sapan Shah

814-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 815 Tam Nguyen

815-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 816 Paul Miller

816-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

816-2 See response to Comment 816-1. As explained on page 3.1-3 of the Draft EIR, traffic delay (often measured by level of service) is no longer permissible as a CEQA impact criterion and therefore this analysis and related topics are not addressed in the Draft EIR. See MR-11: Traffic Delay and Level-of-Service and the 2023 Transportation Detail Report, published concurrently with the Draft EIR, for a discussion of traffic conditions. The LPA, Trench Option, and Hawthorne Option would fully grade separate light rail from all roadways. Noise is addressed in Section 3.6, Noise and Vibration, of the Draft EIR. Air Quality is addressed in Section 3.4, Air Quality, of the Draft EIR, which finds that operational impacts of the Elevated/At-Grade Alignment, Trench Option and Hawthorne Option would improve air quality relative to 2042 without project conditions. This conclusion likewise applies to the LPA, as described in Section 4.5-3.4.2 of the Draft EIR, and Final EIR.

Submission 817 Mary Miller

817-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

817-2 The commenter's opposition to the Hawthorne Option is noted. As explained on page 3.1-3 of the Draft EIR, traffic delay (often measured by level of service) is no longer permissible as a CEQA impact criterion and therefore this analysis and related topics are not addressed in the Draft EIR. See MR-11: Traffic Delay and Level-of-Service and the 2023 Transportation Detail Report, published concurrently with the Draft EIR, for a discussion of traffic conditions, including a discussion of the proposed pedestrian crosswalk on Hawthorne Boulevard under the Hawthorne Option.

Submission 818 Matthew Bilodeau

818-1 The commenter's support for the Elevated/At-Grade Alignment is noted. See MR-1: Selection of Alternatives. The project would provide a direct connection to the LAX/Metro Transit Center, which would link to the LAX Automated People Mover. Both the Metro C and K Lines provide a connection to LAX.

Submission 819 Al Tatro

819-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

819-2 The commenter's opposition to the Hawthorne Option is noted. All comments have been shared with the Metro Board for their consideration. See response to Comment 819-1.

Submission 820 Angela Brizuela

820-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

820-2 This comment is noted. See response to comment 820-1. As explained on page 3.1-3 of the Draft EIR, traffic delay (often measured by level of service) is no longer permissible as a CEQA impact criterion and therefore this analysis and related topics are not addressed in the Draft EIR. See MR-11: Traffic Delay and Level-of-Service and the 2023 Transportation Detail Report, published concurrently with the Draft EIR, for a discussion of traffic conditions. The LPA and Trench Option would fully grade separate light rail from all roadways and would not increase vehicle delay compared to existing conditions. The Hawthorne Option would similarly grade separate the light rail; however, due to proposed changes to traffic signals and roadway modifications, the Hawthorne Option could affect circulation patterns, as described in MR-11. The 2023 Ridership Summary Report, published concurrently with the Draft EIR, describes the estimated ridership for each of the options. See MR-15: Metro Ridership Forecasting Methodology.

Submission 821 Michale Kirby

821-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

821-2 This comment is noted. All comments have been shared with the Metro Board for their consideration. See response to Comment 821-1.

Submission 822 Rebecca Eastman

822-1 The commenter's support for the Elevated/At-Grade Alignment and opposition to the Hawthorne Option is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 823 Tammy Clark

823-1 The commenter's support for the Elevated/At-Grade Alignment and opposition to the Hawthorne Option is noted. See MR-1: Selection of Alternatives. As explained on page 3.1-3 of the Draft EIR, traffic delay (often measured by level of service) is no longer permissible as a CEQA impact criterion and therefore this analysis and related topics are not addressed in the Draft EIR. See MR-11: Traffic Delay and Level-of-Service and the 2023 Transportation Detail Report, published concurrently with the Draft EIR, for a discussion of traffic conditions. The LPA fully grade separates light rail from all roadways and would not increase vehicle delay compared to existing conditions.

Submission 824 Scott Clark

824-1 The commenter's support for the Elevated/At-Grade Alignment and opposition to the Hawthorne Option is noted. See MR-1: Selection of Alternatives. As explained on page 3.1-3 of the Draft EIR, traffic delay (often measured by level of service) is no longer permissible as a CEQA impact criterion and therefore this analysis and related topics are not addressed in the Draft EIR. See MR-11: Traffic Delay and Level-of-Service and the 2023 Transportation Detail Report, published concurrently with the Draft EIR, for a discussion of traffic conditions. The LPA fully grade separates light rail from all roadways and would not increase vehicle delay compared to existing conditions.

Submission 825 Jason Blain

825-1 The commenter's support for the Elevated/At-Grade Alignment and opposition to the Hawthorne Option is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 826 Ins Luters

826-1 The commenter's support for the Trench Option is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 827 Anonymous

827-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

827-2 See response to Comment 827-1.

Submission 828 Terrence Chen

828-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 829 Daniel B. Gast

829-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 830 Richard Stenhouse

830-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 831 Isabel Gutierrez

831-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 832 Kaylyn Fukuhara

832-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 833 Margaret Schaffmeir

833-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 834 Thomas Penland

834-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives. See MR-18: Homelessness.

Submission 835 Justin Hollingsworth

835-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 836 Nancy Cruz

836-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 837 Vanessa Gonzalez

837-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 838 Daisy Herrera

838-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 839 Al Trato

839-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 840 Carol Truitt

840-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 841 Rebecca Reeves

841-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 842 Tim Goodrich

842-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 843 Dennis Piotrowski

843-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 844 Alan Ariel Carlos

844-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 845 Jose Daniel Alabaso

845-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

845-2 Metro is designing the terminus station at the Torrance Transit Center to allow the line to continue further south, should funding become available in the future. Potential extensions from the Torrance Transit Center to San Pedro, Long Beach, and the Los Angeles/Orange County line are included in the unfunded portion of the 2009 Metro Long Range Transportation Plan. Metro may consider these projects in the future, if additional funding becomes available.

Submission 846 Ryan Saruwatari

846-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 847 Nathan Koller

847-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 848 Craig Haller

848-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 849 Myles Honda

849-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 850 Jean Katow

850-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 851 Ronald Rucker

851-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 852 Molly O'Callahan

852-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 853 George K. Chen

853-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives and MR-21: Cost Estimates and Schedule.

Submission 854 Marifrances Trivelli

854-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 855 Nelsy Jimenez

855-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 856 Diane Ki

856-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

856-2 See MR-9: Light Rail Security.

Submission 857 Kirtan Tank

857-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 858 David Lambi

858-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives and MR-21: Cost Estimates and Schedule.

Submission 859 Raihan Fazalbhoy

859-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 860 Adrienne Greenfield

860-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 861 Camille Randolph

861-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 862 Timothy Gould

862-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives and MR-21: Cost Estimates and Schedule.

Submission 863 Lyle Sanders

863-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 864 Kitty Shiao

864-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives and MR-21: Cost Estimates and Schedule.

Submission 865 G Patricia Stewart

865-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 866 Russell Stewart

866-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 867 Peter Spartalis

867-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 868 Julio Ceballos

868-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 869 William Laronal

869-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 870 Toni Wright

870-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

870-2 Visual impacts are addressed in Section 3.3, Aesthetics, of the Draft EIR. Regarding traffic, as explained on page 3.1-3 of the Draft EIR, traffic delay (often measured by level of service) is no longer permissible as a CEQA impact criterion and therefore this analysis and related topics are not addressed in the Draft EIR. See MR-11: Traffic Delay and Level-of-Service and the 2023 Transportation Detail Report, published concurrently with the Draft EIR, for a discussion of traffic conditions. The LPA fully grade separates light rail from all roadways and would not increase vehicle delay compared to existing conditions. Under CEQA economic effects, such as financial effects on businesses, are not considered environmental effects. Metro has created a Business Interruption Fund for major rail projects under construction in Los Angeles County to support the business community.

Submission 871 Ryan Uyehara

871-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 872 Melfern Claro

872-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 873 Winston Zhou

873-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 874 Brennan Long

874-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

874-2 See response to comment 874-1. Metro does not have oversight of Torrance Transit.

Submission 875 Jose Dennis Alabaso

875-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

875-2 The commenter's request is noted. All comments have been shared with the Metro Board for their consideration. The Metro Aviation/Century C/K Line Station opened in Fall 2024.

Submission 876 Thomas Elder

876-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 877 Yundan Liu

877-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

877-2 See response to Comment 877-1.

Submission 878 Raymond Peterson

878-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

878-2 The commenter's opposition to the Hawthorne Option and support for the Metro ROW Alignment is noted. All comments have been shared with the Metro Board for their consideration. See response to Comment 878-1.

Submission 879 Kay Peterson

879-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

879-2 The commenter's opposition to the Hawthorne Option and support for the Metro ROW Alignment is noted. All comments have been shared with the Metro Board for their consideration. See response to Comment 879-1.

Submission 880 Sunny Zhou

880-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 881 Frank Huang

881-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 882 Sarah Chiang

882-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 883 Caroline Kong

883-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 884 Karl Kohl

884-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 885 Alexander

885-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 886 Mike Palmer

886-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

886-2 Metro has worked diligently to develop feasible and effective mitigation measures to address the potentially significant impacts of the project.

Submission 887 Jose Roldan

887-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 888 Maria Pescheryakova

888-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 889 Steven Gerhardt

889-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

889-2 The commenter's opposition to the Hawthorne Option is noted. All comments have been shared with the Metro Board for their consideration.

Submission 890 Al Tatro

890-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

890-2 See MR-21: Cost Estimates and Schedule.

Submission 891 Miguel Dvid

891-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 892 Sheila Fierro

892-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

892-2 As noted by the comment, the Metro ROW has long been planned for potential transit expansion, although Metro acknowledges that some residents who live near the ROW may have been unaware of the potential for future transit use. Noise is discussed in Section 3.6, Noise and Vibration, of the Draft EIR. See MR-3: Operational Noise Project Features and Mitigation Measures.

Submission 893 Kim Turner

893-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

893-2 See response to Comment 893-1.

Submission 894 Dennis Bosch

894-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 895 Calin Chiorean

895-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 896 Darren Uyematsu

896-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 897 Michael Fetaru

897-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 898 Nikola Renard

898-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

898-2 The commenter's support for the project is noted. All comments have been shared with the Metro Board for their consideration.

Submission 899 Michael Brenk

899-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

899-2 See response to comment 899-1. The project schedule will continue to be updated as refinements to the design, project cost estimates, and funding plans are advanced. See MR-21: Cost Estimates and Schedule.

Submission 900 Alex Emly

900-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

900-2 The commenter's support for the project is noted. All comments have been shared with the Metro Board for their consideration. See response to comment 900-2.

Submission 901 Kyle Freitas

901-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

901-2 The commenter's support for the Trench Option is noted. All comments have been shared with the Metro Board for their consideration. See response to Comment 901-1.

Submission 902 Alexandra Flores

902-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 903 Jamelia Davenport

903-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 904 Michael Kosidlak

904-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 905 Andrea Retana

905-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 906 Kathy Wood

906-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 907 Dawn Ng

907-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 908 Kevin Griswold

908-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

908-2 The commenter's support for the project is noted. All comments have been shared with the Metro Board for their consideration.

Submission 909 Andre Flores

909-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 910 Judith Gerber

910-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 911 Patti O'Reilly

911-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 912 Barbara Kelly

912-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 913 Mauricio De La Torre

913-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 914 Alonso Muñoz

914-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 915 Skyler Reynoso

915-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 916 William Chuh

916-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 917 Lyle Sanders

917-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 918 Nedeen Nasser

918-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 919 Ryan Bada

919-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 920 Raymond Fisher

920-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 921 Michelle Hughes

921-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 922 Frank Kraus

922-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 923 Sawyer

923-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 924 Rudy Onate

924-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

924-2 Metro is designing the terminus station at the Torrance Transit Center to allow the line to continue further south, should funding become available in the future. Potential extensions from the Torrance Transit Center to San Pedro, Long Beach, and the Los Angeles/Orange County line are included in the unfunded portion of the 2009 Metro Long Range Transportation Plan. Metro may consider these projects in the future, if additional funding becomes available.

Submission 925 Micah Alex

925-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 926 Shin Furukawa

926-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 927 Chau Yang

927-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 928 Jeanne Bala

928-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

928-2 Under CEQA, economic effects, such as financial effects on businesses, are not considered environmental effects. Metro has created a Business Interruption Fund for major rail projects under construction in Los Angeles County to support the business community.

Submission 929 Patrice Watanabe

929-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 930 Wayne Watanabe

930-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 931 Zen Rosenthal

931-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 932 Stephen Kawalko

932-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 933 Traveion Bell

933-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives. You can find more about Metro's training programs and career opportunities at www.metro.net/about/careers/students/.

Submission 934 Juan Delgado

934-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 935 Victor Alvarado

935-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 936 Richard Krason

936-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 937 Kevin Chan

937-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 938 Andrea Seo Bauer

938-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 939 Brian Rodriguez

939-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 940 Linda Amato

940-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 941 LeRoy Jackson

941-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

941-2 As described in Section 3.1, Transportation, of the Draft EIR, Project Feature PF-T-1 requires contractors to develop a Construction Traffic Management Plan (CTMP), which would include coordination with local businesses and residents as well as relevant jurisdictions to manage access and the effects of temporary closures and identify reasonable accommodations or alternatives, which could include limiting construction hours, providing alternate routes or temporary easements, or other strategies. PF-T-1 would apply to all of the alignment options studied in the Draft EIR.

Submission 942 Rebecca Poirier

942-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 943 L.R. Rowe

943-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives. Guidance on how to ride Metro Rail can be found at https://www.metro.net/riding/guide/how-ride-rail/.

Submission 944 Janet Dirks

944-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 945 Scott Wood

945-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives. See MR-9: Light Rail Security.

Submission 946 Marian Kravitz

946-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 947 Shawn Denny

947-1 The commenter's opposition to the project is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives. See MR-9: Light Rail Security and MR-21: Cost Estimates and Schedule.

Submission 948 Joanne Verespej

948-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

948-2 Chapter 2, Description of the Locally Preferred Alternative, of the Final EIR, includes an updated schedule for the LPA. The project schedule and cost estimates will continue to be updated as the design advances. See MR-21: Cost Estimates and Schedule.

Submission 949 W. Hamada

949-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 950 Steve Oshiro

950-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 951 Robin Fields

951-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 952 Paul Matsumoto

952-1 The commenter's support for the Elevated/At-Grade Alignment and Trench Option is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 953 Nicki Noble

953-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 954 Craig Kazin

954-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 955 Mark Chavez

955-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 956 Jahja

956-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 957 Reagan Woo

957-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

957-2 The commenter's opposition to the Hawthorne Option is noted. All comments have been shared with the Metro Board for their consideration. All options and Alternatives would connect to the Torrance Transit Center, including the Hawthorne Option.

Submission 958 Cliff Weinan

958-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives. See MR-9: Light Rail Security.

Submission 959 Stan Ponegalek

959-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 960 David Sakai

960-1 The commenter's support for the Trench Option is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 961 Pamela Dieter

961-1 The commenter's support for the Hawthorne Option is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

961-2 See MR-8: Light Rail and Freight Train Safety.

Submission 962 Freida Wang

962-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 963 Allen Treibull

963-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 964 Charles Dorsey

964-1 The commenter's support for the Elevated/At-Grade Alignment and Trench Option is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 965 Robert G. Dye

965-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 966 Catherine Clarke

966-1 The commenter's preference for the Trench Option but overall opposition to the project is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives and MR-15: Metro Ridership Forecasting Methodology.

Submission 967 Nancy Bridi

967-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 968 Beverly Ricketts

968-1 The commenter's support for the Trench Option is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 969 Juan Cabeza

969-1 The commenter's support for the Hawthorne Option is noted. See MR-1: Selection of Alternatives. As explained on page 3.1-3 of the Draft EIR, traffic delay (often measured by level of service) is no longer permissible as a CEQA impact criterion and therefore this analysis and related topics are not addressed in the Draft EIR. See MR-11: Traffic Delay and Level-of-Service and the 2023 Transportation Detail Report, published concurrently with the Draft EIR, for a discussion of traffic conditions. The LPA fully grade separates light rail from

all roadways and would not increase vehicle delay compared to existing conditions. As indicated in Section 3.1-4.2.2 of the Draft EIR, each of the alignment options under consideration would have a neutral or beneficial effect on vehicle miles traveled (VMT). Chapter 4, Corrections and Additions, of the Final EIR has been updated to clarify that the VMT reduction for the LPA is the same as for the Elevated/At-Grade Alignment and Trench Option.

Submission 970 Joyce Henderson

970-1 The commenter's opposition to the project is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives and MR-9: Light Rail Security.

Submission 971 Anonymous

971-1 The commenter's opposition to the project is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

971-2 See MR-9: Light Rail Security.

Submission 972 M. Suarez

972-1 The commenter's opposition to the project in general is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

972-2 See MR-9: Light Rail Security.

Submission 973 Lynn

973-1 The commenter's opposition to the project is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives; MR-9: Light Rail Security; and MR-10: Changes to Community Character.

Submission 974 David H. Lee

974-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 975 Judith Crosby

975-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 976 Depland

976-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 977 Christopher Caunt

977-1 The commenter's support for the Elevated/At-Grade Alignment is noted. See MR-1: Selection of Alternatives. The project design does not prohibit a future extension that would continue south on the Metro ROW. Potential extensions from the Torrance Transit Center to San Pedro, Long Beach, and the Los Angeles/Orange County line are included in the unfunded portion of the 2009 Metro Long Range Transportation Plan. Metro may consider these projects in the future, if additional funding becomes available. Any future extension would be subject to its own environmental review under CEQA and other applicable requirements before it could be implemented.

Submission 978 Bruce Hamilton

978-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 979 Michele Kidman

979-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 980 J. Gardinale

980-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 981 Robert Allen

981-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 982 Steve Marchki

982-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 983 Thomas Fukman

983-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 984 Duane Sung

984-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 985 John Whang

985-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 986 Ray Portka

986-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 987 Judith Carter

987-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 988 Vijenera Joseph

988-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

988-2 The Federal Transit Administration Transit Noise and Assessment Manual (2018) defines the area of potential noise impact as within 350 feet of the proposed light rail transit line. Predicted noise levels have been analyzed and reported for all sensitive receptors located within this distance. See MR-2: Operational Noise Analysis Methodology and Impact Standards.

988-3 The light rail would operate at speeds of between 45 and 65 miles per hour.

988-4 The project is expected to follow the operating patterns of Metro's current rail lines. The anticipated hours of operation are 4:00 a.m. one day to 1:00 a.m. the following day. System headways would be reduced during early morning (4:00 a.m. to 6:00 a.m.) and late-night hours (7:00 p.m. to 1:00 a.m.) to approximately 15 minutes. This would result in a reduced frequency of trains during these hours and reduced overall noise compared to peak-hour

system headways of five minutes. Weekend system headways would be reduced compared to weekdays. For purposes of impact analysis, the Draft EIR assumes that trains would run approximately every five to 10 minutes during peak periods (typical commuting hours) and would run approximately every 10 to 20 minutes during non-peak periods, depending on the time of day. The final operating schedule will be determined closer to project operation.

Submission 989 Offutt

989-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 990 Leroy Kerahen

990-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives and MR-21: Cost Estimates and Schedule.

Submission 991 Pablo Delgado

991-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 992 Janet Wade

992-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 993 Bernadette Kociemba

993-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 994 Carl Willison

994-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 995 John Choy

995-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives and MR-21: Cost Estimates and Schedule.

Submission 996 David Seager

996-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 997 Richard Kim

997-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 998 Randall Leak

998-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 999 Janet Colmerauer

999-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1000 Mr. and Mrs. John Hardin

1000-1 The commenter's support for the Elevated/At-Grade Alignment is noted. Metro is designing the terminus station at the Torrance Transit Center to allow the line to continue further south along the Metro ROW, should funding become available in the future. Potential extensions from the Torrance Transit Center to San Pedro, Long Beach, and the Los Angeles/Orange County line are included in the unfunded portion of the 2009 Metro Long Range Transportation Plan. Metro may consider these projects in the future, if additional funding becomes available.

Submission 1001 Elizabeth Evans

1001-1 The commenter's support for the Elevated/At-Grade Alignment and opposition to the Hawthorne Option is noted. Metro is designing the terminus station at the Torrance Transit Center to allow the line to continue further south, should funding become available in the future. Potential extensions from the Torrance Transit Center to San Pedro, Long Beach, and the Los Angeles/Orange County line are included in the unfunded portion of the 2009 Metro Long Range Transportation Plan. Metro may consider these projects in the future, if additional funding becomes available.

Submission 1002 Mary Strenn

1002-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1003 Fred Missman

1003-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1004 Karen Wheeler

1004-1 The commenter's support for the Elevated/At-Grade Alignment and opposition to the Trench Option is noted. See MR-1: Selection of Alternatives. See MR-8: Light Rail and Freight Train Safety. Metro is committed to ensuring that bus access is optimized, regardless of the final station locations. Metro would continue to engage with local transit providers to optimize bus access. Chapter 2, Description of the Locally Preferred Alternative, of the Final EIR, includes an updated schedule for the LPA. The project schedule will continue to be updated as refinements to the design, project cost estimates, and funding plans are advanced.

Submission 1005 Jan and Dan Moorehouse

1005-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1006 Rogy

1006-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration.

1006-2 Regarding job creation, as discussed in Section 3.15, Public Services and Recreation, of the Draft EIR, although construction of the project would create additional jobs in the project area, construction workers would temporarily work in the area and would not likely relocate to the project area on a permanent basis. Additionally, a minimum of 40% of all project work hours would be local hire workers as per Metro's Local Hire Initiative.

Regarding police services, under CEQA, an increase in the need for police services is not considered an environmental impact requiring analysis. However, Section 3.15, Public Services and Recreation, of the Draft EIR, does evaluate whether the project would create a demand for public services, such as police, which would necessitate the construction of new or expanded facilities, the construction of which could result in environmental impacts. The analysis concludes that the project would not result in unplanned population growth or other conditions that would generate a demand for new or expanded public service facilities. Therefore, no such impacts were identified.

Regarding project funding, the project has secured funding from Measure R (2008), Measure M (2016), Transit and Intercity Rail Capital Program (TIRCP) Grant from the California State Transportation Agency Transit and Intercity Rail Capital Program, and 3% match contributions from local jurisdictions. Metro would continue to explore funding opportunities for the project, if approved by the Metro Board.

See MR-18: Homelessness.

Submission 1007 Sandra and Bill Goetz

1007-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

1007-2 The commenter's opposition to trains is noted. All comments have been shared with the Metro Board for their consideration.

Submission 1008 Robert and Paula Castro

1008-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1009 Linda and Thomas Hart

1009-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1010 Russ and Trish Stewart

1010-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1011 Charles Ford Jr.

1011-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1012 James McGee

1012-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1013 Barbara Safah

1013-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1014 Pauline Acherman

1014-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1015 Edith Reid

1015-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1016 John De Rago

1016-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1017 Judy Douglas

1017-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1018 Daniel McKay

1018-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1019 Anonymous

1019-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1020 Lillian Isobe

1020-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1021 David and Diane Brown

1021-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives. See MR-21: Cost Estimates and Schedule.

Submission 1022 Ron and Karen Ury

1022-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1023 Mr. and Mrs. Mark Hansen

1023-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1024 Anonymous

1024-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1025 C. Rauser

1025-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

1025-2 See MR-15: Metro Ridership Forecasting Methodology. The project has secured funding from Measure R (2008), Measure M (2016), Transit and Intercity Rail Capital Program (TIRCP) Grant from the California State Transportation Agency Transit and Intercity Rail Capital Program, and 3% match contributions from local jurisdictions. Metro would continue to explore funding opportunities for the project, if approved.

Submission 1026 Donn Plewes

1026-1 The commenter's support for the Elevated/At-Grade Alignment and opposition to the Metro ROW alignment is noted. See MR-1: Selection of Alternatives. Chapter 2, Description of the Locally Preferred Alternative, of the Final EIR, includes an updated schedule for the LPA. The project schedule will continue to be updated with refinements to the design, project cost estimates, and funding plans. See MR-21: Cost Estimates and Schedule.

Submission 1027 Jane Kamiya

1027-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1028 Frank Mekrut

1028-1 The commenter's support for the Elevated/At-Grade Alignment is noted. See MR-1: Selection of Alternatives; MR-9: Light Rail Security; and MR-18: Homelessness. Previous

studies examined routes to Del Amo Mall, but those options were screened out as they did not provide comparable ridership benefits.

Submission 1029 Elizabeth Higgins

1029-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

1029-2 A map illustrating the LPA and project options can be located on the Metro project website, as well as in different sections of the EIR. The online maps are interactive and can be zoomed in for detailed viewing. https://www.metro.net/projects/green-line-extension/

Submission 1030 Michael Maiuri

1030-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1031 Camille Henderson Cardenas

1031-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1032 Loren Heard

1032-1 The comment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives. The project is being developed and implemented by Metro, not the State of California. Metro's Board of Directors, which is composed of locally elected officials and appointees, provides oversight, and makes decisions about the project's planning, funding, and implementation.

Submission 1033 Anonymous

1033-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

1033-2 A map illustrating the LPA and project options can be located on the Metro project website, as well as in different sections of the EIR. The online maps are interactive and can be zoomed in for detailed viewing. https://www.metro.net/projects/green-line-extension/.

Submission 1034 Robert and Linda Culpeper

1034-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1035 William and Claudia Fischer

1035-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1036 Martin and Ann Gallagher

1036-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1037 Sheldon Katzer

1037-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1038 AJ and Richard Ziman

1038-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1039 David Frazee

1039-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

1039-2 Section 3.6, Noise and Vibration, of the Draft EIR, identifies mitigation measures to minimize noise levels of construction and operation of the project. See MR-3: Operational Noise Project Features and Mitigation Measures for information regarding noise project features and mitigation measures. Although operation of the Elevated/At-Grade Alignment would result in a significant and unavoidable noise impact, the operational noise impacts of the Trench Option, Hawthorne Option, and LPA would be less than significant with mitigation.

Submission 1040 Joyce Nagel

1040-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1041 Linda Howard

1041-1 The commenter's support for the Elevated/At-Grade Alignment and Trench Option is noted. All comments have been shared with the Metro Board for their consideration.

Submission 1042 Henry Yee

1042-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1043 Nelson Duenas

1043-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

1043-2 See response to comment 1043-1.

Submission 1044 Theo Misaresh

1044-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

1044-2 See response to comment 1044-1.

Submission 1045 Resident

1045-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1046 William Haffey

1046-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1047 Janice Collins

1047-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

1047-2 See response to comment 1047-1. As explained on page 3.1-3 of the Draft EIR, traffic delay (often measured by level of service) is no longer permissible as a CEQA impact criterion and therefore this analysis and related topics are not addressed in the Draft EIR. See MR-11: Traffic Delay and Level-of-Service and the 2023 Transportation Detail Report, published concurrently with the Draft EIR, for a discussion of traffic conditions. As indicated in Section 3.1-4-2.2 of the Draft EIR, each alignment option under consideration would result in a neutral or positive effect on vehicle miles traveled.

Submission 1048 Sherwin Rubin

1048-1 The commenter's support for the Elevated/At-Grade Alignment is noted. See MR-1: Selection of Alternatives. The project would provide a direct connection to the LAX/Metro Transit Center, which would link to the LAX Automated People Mover. Both the Metro C and K Lines provide a connection to LAX.

Submission 1049 Noema Lorenzo

1049-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

1049-2 The commenter's support for the Metro ROW alignment is noted. As explained on page 3.1-3 of the Draft EIR, traffic delay (often measured by level of service) is no longer permissible as a CEQA impact criterion and therefore this analysis and related topics are not addressed in the Draft EIR. See MR-11: Traffic Delay and Level-of-Service and the 2023 Transportation Detail Report, published concurrently with the Draft EIR, for a discussion of traffic conditions. The LPA, Trench Option, and Hawthorne Option fully grade separates light rail from all roadways and would not increase vehicle delay compared to existing conditions.

Submission 1050 Daniel Dalton

1050-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1051 Anthony Garcia

1051-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1052 Jay Hoffman and Alicia Jacobson

1052-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1053 Kyle Freitas

1053-1 The commenter's support for the Trench Option is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

1053-2 The commenter's preference for the Trench Option related to safety and noise concerns is noted. See MR-9: Light Rail Security and Section 3.6, Noise and Vibration, of the Draft EIR. The LPA, similar to the Trench Option, would fully grade separate light rail from roadways and avoid operational noise impacts with mitigation.

Submission 1054 Terry Masaoka

1054-1 The commenter's support for the Trench Option is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1055 Eduardo Paiva

1055-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

1055-2 The proposed stations were selected based on ridership potential, ability to provide through service, physical fit, and community impacts. Previous studies examined routes to Del Amo Mall, but those options were screened out as they did not provide comparable ridership benefits.

Submission 1056 Joe Molloy

1056-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1057 Fred Won

1057-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

1057-2 Chapter 2, Description of the Locally Preferred Alternative, of the Final EIR, includes an updated schedule for the LPA. The project schedule will continue to be updated as refinements to the design, project cost estimates, and funding plans are advanced. See MR-21: Cost Estimates and Schedule.

Submission 1058 James Won

1058-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives. Metro strives to complete projects on time and within estimated budgets.

Submission 1059 Jeff O'Brien

1059-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1060 Dolores Merendo

1060-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1061 Naeim Soliman

1061-1 The commenter's support for the Trench Option is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1062 Pozos

1062-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1063 Ronald Murakami

1063-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1064 Mike Marin

1064-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

1064-2 See MR-9: Light Rail Security and MR-18: Homelessness.

Submission 1065 Lisa Chun

1065-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1066 Roberta Siegel-Okumura

1066-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1067 Sara

1067-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

1067-2 See MR-18: Homelessness.

Submission 1068 Noreen Tsumaki

1068-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

1068-2 The commenter's opposition to the Trench Option is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1069 Gabriel Catalogne

1069-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1070 Bryan Thompson

1070-1 The commenter's support for the Trench Option is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1071 Shiv Murti

1071-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

1071-2 The commenter's opinion regarding cost efficiency is noted. Cost efficiency is one of the objectives on which the Metro Board made its LPA selection. Metro strives to complete projects on time and within estimated budgets.

Submission 1072 Roxanne Morrow

1072-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1073 Tim Knerr

1073-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

1073-2 The commenter's opposition to the Hawthorne Option is noted. All comments have been shared with the Metro Board for their consideration.

Submission 1074 Deborah Comstock

1074-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1075 Theresa Barke

1075-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

1075-2 Chapter 2, Description of the Locally Preferred Alternative, of the Final EIR, includes an updated schedule for the LPA. The project schedule and cost estimates will continue to be updated as the design advances. Under CEQA, economic impacts, such as effects on businesses, are not considered environmental impacts. Metro has created a Business Interruption Fund for major rail projects under construction in Los Angeles County to support the business community.

Submission 1076 Dorothy Derricks

1076-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

1076-2 The commenter's support for the Metro ROW alignment is noted. All comments have been shared with the Metro Board for their consideration.

Submission 1077 Arthur Oshiro

1077-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1078 Scott Bauer

1078-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

1078-2 The commenter's support for the Metro ROW alignment and Trench Option is noted. All comments have been shared with the Metro Board for their consideration. The LPA, Trench Option, and Hawthorne Option would fully grade separate light rail from all roadways.

Submission 1079 Frank R.

1079-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1080 Judy Tizon

1080-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

1080-2 The commenter's support for the Metro ROW alignment is noted. The opposition to the Hawthorne Option due to cost concerns is also noted. See MR-21: Cost Estimates and Schedule. Chapter 2, Description of the Locally Preferred Alternative, of the Final EIR, includes an updated schedule for the LPA. The project schedule and cost estimates will continue to be updated as the design advances. Section 3.6, Noise and Vibration, of the Draft EIR, includes comprehensive mitigation measures to minimize and/or avoid impacts. Although operation of the Elevated/At-Grade Alignment would result in a significant and unavoidable noise impact, the operational noise impact of the Trench Option, Hawthorne Option, and LPA would be less than significant with mitigation. Accordingly, no additional mitigation is required for those alignment options. See MR-3: Operational Noise Project Features and Mitigation Measures.

Submission 1081 Romanelli

1081-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1082 Sylvia S.

1082-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1083 Claudia Brubaker

1083-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1084 Amjadi's

1084-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

1084-2 Metro acknowledged that comment letter represents one person in support of the project and one person opposed to the project. The commenter's preference for an at-grade option is noted. All comments have been shared with the Metro Board for their consideration.

Submission 1085 Nancy Taneka

1085-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1086 Mary and Alan Shadbourne

1086-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1087 John McGee

1087-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

1087-2 The commenter's opinion on the benefits of the Elevated/At-Grade Alignment and cost are noted. All comments have been shared with the Metro Board for their consideration.

Submission 1088 Fred Wolfe

1088-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

1088-2 The commenter's opinion on the benefits of the Hawthorne Option and cost and schedule concerns are noted. All comments have been shared with the Metro Board for their consideration.

Submission 1089 James Bailey

1089-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1090 Kelly Hartman

1090-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

1090-2 Metro published a summary of preliminary cost estimates and schedule in 2023, concurrent with the Draft EIR. The project construction costs range from $1.96 billion to $2.96 billion (as estimated in 2022) depending on the route and design configuration. See MR-21: Cost Estimates and Schedule.

1090-3 Chapter 2, Description of the Locally Preferred Alternative, of the Final EIR includes an updated schedule for the LPA. The project schedule and cost estimates will continue to be updated as the design advances.

Submission 1091 Georgia Williams

1091-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1092 Robert Hernandez

1092-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1093 Ray Karimoto

1093-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1094 Melody Knerr

1094-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

1094-2 The commenter's support for the Metro ROW alignment and opposition to the Hawthorne Option is noted. All comments have been shared with the Metro Board for their consideration.

Submission 1095 Karen Currey

1095-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1096 Lori Yamasaka

1096-1 The commenter's support for the Hawthorne Option is noted. All comments have been shared with the Metro Board for their consideration.

Submission 1097 Niparpon Johansen

1097-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

1097-2 The commenter's opinion regarding the perceived safety and environmental quality of the Elevated/At-Grade Alignment, Trench Option, and Hawthorne Option is noted. However, at-grade crossings are generally considered to present a higher risk of collisions with vehicles and pedestrians compared to grade-separated options. The LPA, Trench Option, and Hawthorne Options would eliminate these conflicts by fully separating light rail from roadways. The Draft EIR evaluates the potential impacts associated with each option in multiple resource areas, including air quality (Section 3.4), pedestrian safety (Section 3.1), and aesthetics (Section 3.3). Dust and air pollution are not expected to accumulate under the elevated guideway in a meaningful or harmful way because the guideway would be open to air on all sides, allowing for natural ventilation. As set forth in Section 3.4-2.5 of the Draft EIR, each alignment option would comply with PF-AQ-2 (SCAQMD Rule 403 Compliance) to control dust and emissions during construction. As set forth in Section 3.4-4 of the Draft EIR, no adverse air quality impacts are expected during operation of the alignment options.

Submission 1098 Marciano Saldana

1098-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1099 Hamin

1099-1 The commenter's support for the Hawthorne Option is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1100 Moien Bigdeli

1100-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1101 Allegra DeMott

1101-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

1101-2 See MR-14: Property Values and Impacts to Businesses

Submission 1102 Deb White

1102-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1103 Kevin White

1103-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1104 Sherry Roberts

1104-1 The commenter's opposition to the project is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

1104-2 The Draft EIR evaluates several physical environmental topics related to the concerns implicated in this comment, including pedestrian safety (Section 3.1, Transportation), land use compatibility (Section 3.2, Land Use), visual quality (Section 3.3, Aesthetics), noise and vibration (Section 3.6, Noise and Vibration), and wildlife (Section 3.7, Biological Resources). These sections assess how the project may affect surrounding neighborhoods. Although the Elevated/At-Grade Alignment would result in a significant and unavoidable operational noise impact, none of the other alignments studied – including the LPA – would result in significant and unavoidable operational impacts. Temporary construction-related impacts would be reduced to the maximum extent feasible through implementation of mitigation measures. See MR-10: Changes to Community Character.

Submission 1105 Tyler

1105-1 The commenter's support for the Hawthorne Option is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

1105-2 Metro is not considering a trolley system on Hawthorne Boulevard south to the Pacific Coast Highway as part of the project.

Submission 1106 Charles Osborne

1106-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1107 Moss Misiaszek

1107-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

1107-2 Metro notes the commenter's desire for more transit with less interference at crossings and lights. The LPA, Trench Option, and Hawthorne Option fully grade separate light rail from streets to avoid conflicts with pedestrians, cyclists, and vehicles.

Submission 1108 Leo Tsai

1108-1 The commenter's opposition to a new transit system located in Torrance is noted. See MR-1: Selection of Alternatives. Traffic signals within Torrance are operated by the City of Torrance and are within the City's jurisdiction to modify or improve.

Submission 1109 John VanderVennet

1109-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1110 Tobeylynn Birch

1110-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

1110-2 Cost efficiency is one of the objectives on which the Metro Board made its LPA selection. Metro strives to complete projects on time and within estimated budgets. Chapter 2, Description of the Locally Preferred Alternative, of the Final EIR, includes an updated schedule for the LPA. The project schedule and cost estimates will continue to be updated as the design advances. See MR-21: Cost Estimates and Schedule.

Submission 1111 Ed De La Cruz

1111-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

1111-2 This project would provide alternatives to the busy I-405 corridor and also more transit options in this region by connecting to the existing Metro rail lines, as well as two regional bus centers in Redondo Beach and Torrance. The 2023 Ridership Summary Report, published alongside the Draft EIR, shows that the project is expected to generate between 11,500 to 15,600 daily transit trips (boardings). See MR-15: Metro Ridership Forecasting Methodology. Metro published a summary of preliminary cost estimates and schedule in 2023, concurrent with the Draft EIR. The project construction costs range from $1.96 billion to $2.96 billion (as estimated in 2022) depending on the route and design configuration. See MR-21: Cost Estimates and Schedule.

Submission 1112 Hector

1112-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

1112-2 This commenter's support for public transit and use of existing infrastructure is noted. All comments have been shared with the Metro Board for their consideration.

Submission 1113 Johnson

1113-1 The commenter's support for the Hawthorne Option is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1114 Victoria Nagano

1114-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1115 Travis Wilmer

1115-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1116 Bob Kelchner

1116-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

1116-2 Noise impacts and mitigation measures are described in detail in Section 3.6, Noise and Vibration, of the Draft EIR. Soundwalls would be installed in areas where noise levels are predicted to exceed Federal Transit Administration (FTA) noise impact criteria for residences, as required by Mitigation Measure MM-NOI-2: Soundwalls. These soundwalls would block the line-of-sight between the light rail train and sensitive receptors, reducing noise impacts. See MR-3: Operational Noise Project Features and Mitigation Measures.

Submission 1117 James Knerr

1117-1 The commenter's support for the Trench Option is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

1117-2 The commenter's opposition to the Hawthorne Option is noted. All comments have been shared with the Metro Board for their consideration.

Submission 1118 Steph Knerr

1118-1 The commenter's support for the Trench Option is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1119 Jules River

1119-1 The commenter's support for the Trench Option is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives and MR-18: Homelessness.

Submission 1120 Bill and Elaine McMullen

1120-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

1120-2 The commenter's support is noted. All comments have been shared with the Metro Board for their consideration.

Submission 1121 Steven Dewberry

1121-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

1121-2 The commenter's opposition to the project in Torrance and alternative support for "the lowest cost option" is noted. Metro published a summary of preliminary cost estimates and schedule in 2023, concurrent with the Draft EIR. The project construction costs range from $1.96 billion to $2.96 billion (as estimated in 2022) depending on the route and design configuration. See MR-21: Cost Estimates and Schedule.

Submission 1122 S. Zirkes

1122-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

1122-2 The project has been designed to provide convenient access to the Redondo Beach Transit Center and Torrance Transit Center, which were selected based on extensive analysis of connectivity and accessibility and community outreach. The stations would serve as key transit hubs, with existing local bus routes providing access to nearby destinations. While Metro assists in identifying improvements during the planning and design phases, the implementation of local access to regional transit facilities falls under the jurisdiction of the local cities. If the project is approved, Metro would coordinate with the local jurisdictions to assist in this planning.

Submission 1123 John Schlosser

1123-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1124 David Smith and Guadalupe Vicon

1124-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

1124-2 The commenter's support for the project is noted. All comments have been shared with the Metro Board for their consideration.

Submission 1125 Jiteshkumar Patel

1125-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1126 David Placenti

1126-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

1126-2 The commenter's support for the lowest cost and least intrusive option is noted. Metro published a summary of cost and schedule in 2023. Metro published a summary of preliminary cost estimates and schedule in 2023, concurrent with the Draft EIR. The project construction costs range from $1.96 billion to $2.96 billion (as estimated in 2022) depending on the route and design configuration. See MR-21: Cost Estimates and Schedule. See Chapter 4, Evaluation of Alternatives, of the Draft EIR for a comparative analysis of the LPA, project options, and alternatives.

Submission 1127 Anonymous

1127-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1128 Abir Chakaborty

1128-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1129 T.B.

1129-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1130 Roxanne Griffin

1130-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1131 Linda Brown

1131-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

1131-2 Noise impacts and mitigation measures are described in detail in Section 3.6, Noise and Vibration, of the Draft EIR. Soundwalls would be installed in areas where noise levels are predicted to exceed Federal Transit Administration (FTA) noise impact criteria for residences, as required by Mitigation Measure MM-NOI-2: Soundwalls. These soundwalls would block the line-of-sight between the light rail train and sensitive receptors, reducing noise impacts. See MR-3: Operational Noise Project Features and Mitigation Measures.

Submission 1132 Mitchell Morgan

1132-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1133 Joseph Gualtiere

1133-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1134 JoAnn Cope

1134-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

1134-2 See response to Comment 1134-1.

Submission 1135 Elena Castillo

1135-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

1135-2 The commenter's support for the Metro ROW alignment is noted. Metro published a summary of preliminary cost estimates and schedule in 2023, concurrent with the Draft EIR. The project construction costs range from $1.96 billion to $2.96 billion (as estimated in 2022) depending on the route and design configuration. See MR-21: Cost Estimates and Schedule.

Submission 1136 John Heins and Yvonne Vanherk

1136-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1137 W. Calzadella

1137-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1138 Barbara Varou

1138-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1139 Marcia and Wilma Noboa

1139-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1140 Michael J. Gibson

1140-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1141 Patty Nishi

1141-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives and MR-9: Light Rail Security.

1141-2 See MR-9: Light Rail Security.

Submission 1142 Young Cheng

1142-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1143 Anonymous

1143-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1144 Mary H. Peters

1144-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1145 Eloise and Pat Shea

1145-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1146 Michael Streibig

1146-1 The commenter's support for the Elevated/At-Grade Alignment is noted. See MR-1: Selection of Alternatives.

Submission 1147 Carter V.

1147-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1148 Kent Hori

1148-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1149 Janis Berges

1149-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1150 Sandra Parvis

1150-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1151 Tom Onalfo

1151-1 The commenter's support for the Elevated/At-Grade Alignment is noted. See MR-1: Selection of Alternatives. Metro would coordinate with the City of Torrance on rail/bus connections as part of future phases of the project, pending approval.

Submission 1152 Patricia Roderick

1152-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1153 Tom and Eileen Pontius

1153-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1154 Anonymous

1154-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1155 Robert Krauss

1155-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1156 Joseph Palsulich

1156-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1157 Pat and Michael Janson

1157-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

1157-2 Metro published a summary of preliminary cost estimates and schedule in 2023, concurrent with the Draft EIR. The project construction costs range from $1.96 billion to $2.96 billion (as estimated in 2022) depending on the route and design configuration. See MR-21: Cost Estimates and Schedule. See Chapter 4, Evaluation of Alternatives, of the Draft EIR for a comparative analysis of the LPA, project options, and alternatives.

Submission 1158 Wayne A. Holman

1158-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1159 F. Momohara

1159-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1160 Simeon Smith

1160-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1161 Pete and Mary Eliopulos

1161-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1162 Allison Fuentevilla

1162-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1163 Anonymous

1163-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1164 Katsuaki Matsuda

1164-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1165 Anthony Galante

1165-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1166 C.A. Turner

1166-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1167 Winnie C. Stanfield

1167-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

1167-2 The commenter's opposition to the Trench Option and Hawthorne Option is noted. All comments have been shared with the Metro Board for their consideration. See response to comment 1167-1.

Submission 1168 Nely Go

1168-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1169 Lorette Muchmore

1169-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1170 Virginia Nelson

1170-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

1170-2 Light rail cannot run on the existing freight tracks, due to different operating requirements and safety. Light rail and freight would be physically separated. See MR-8: Light Rail and Freight Train Safety.

Submission 1171 Mark Dunn

1171-1 The commenter's support for the Elevated/At-Grade Alignment and Metro ROW is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1172 Wayne Mityoshi

1172-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1173 Linda J. Muir

1173-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1174 Suwannee Adomien

1174-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives and MR-9: Light Rail Security.

1174-2 See MR-9: Light Rail Security.

Submission 1175 Jon M. Ziegler

1175-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1176 Michael Dillenback

1176-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1177 Patricia Miyoshi

1177-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1178 Rajeswari Gounder

1178-1 The commenter's support for the Trench Option is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1179 Julie Snakenborg

1179-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1180 C. Bedrossian

1180-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1181 Dario M. Chavez

1181-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

1181-2 This commenter's support for the Metro ROW alignment is noted. All comments have been shared with the Metro Board for their consideration. See response to comment 1181-1.

Submission 1182 Gloria Londono

1182-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1183 Alvaro Lopez

1183-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1184 Vincent Deneux

1184-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1185 Tony Yang

1185-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1186 Charles Delio

1186-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1187 Tim

1187-1 The commenter's opposition to transit is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1188 Sarah Winfrey

1188-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1189 Young-Joon Mok

1189-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1190 Isabel Douvan

1190-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

1190-2 See response to comment 1190-1.

Submission 1191 Melanie White

1191-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1192 Timothy Ma

1192-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1193 Irene Ma

1193-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1194 Matteo Interlandi

1194-1 The commenter's support for the Elevated/At-Grade Alignment and the Trench Option is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1195 Mohamed Fassy Jayah

1195-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1196 Abdulvahob Nabiev

1196-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1197 Alan Kita

1197-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

1197-2 See response to Comment 1197-1. Metro strives to complete projects on time and within estimated budgets.

Submission 1198 Charles Wilson

1198-1 The commenter's support for the Trench Option is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1199 Dawn Kita

1199-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1200 Xianming Liu

1200-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1201 Donna

1201-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1202 Kevin Hetrick

1202-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

1202-2 The project schedule and cost estimates will continue to be updated as the design advances. While offering financial incentives to construction contractors for early completion is worth considering, accelerating the project would present significant challenges. These include securing additional funds, expediting the procurement process, coordinating condensed review and permit approvals from public and private entities, and managing an intensive, compressed construction period. Each of these elements requires careful planning to ensure that safety, environmental regulations, and community impacts are appropriately addressed. Metro remains committed to delivering the project as efficiently as possible while balancing the need to control costs and ensure compliance with all necessary approvals.

Submission 1203 Avelina Daum

1203-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1204 Mark Nakano

1204-1 The commenter's support for the Hawthorne Option is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

1204-2 The commenter's support for an elevated project is noted. All comments have been shared with the Metro Board for their consideration. The LPA, Trench Option, and Hawthorne Option would fully grade separate light rail from all roadways, which would help avoid service delays.

Submission 1205 Nelson Wong

1205-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1206 Catrice Nakamura

1206-1 See MR-9: Light Rail Security and MR-18: Homelessness.

1206-2 The project has secured funding from Measure R (2008), Measure M (2016), Transit Intercity Rail Capital Program (TIRCP) Grant from the California State Transportation Agency (CALSTA) Transit and Intercity Rail Capital Program, and 3% match contributions from local jurisdictions. These funds are specifically allocated for transportation infrastructure and cannot be redirected for unrelated purposes such as homelessness programs or other local services. The commenter's concerns about community character and public priorities are noted. See MR-10: Changes to Community Character.

Submission 1207 Jack L.

1207-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

1207-2 This commenter's preference for an at-grade alignment over the Trench Option and support for a quiet zone is noted. See MR-1: Selection of Alternatives. The project would provide all the upgrades to the crossings needed to establish the quiet zone. See MR-3: Operational Noise Project Features and Mitigation Measures.

1207-3 The commenter's concern regarding parking deterring ridership is noted. The 2023 Ridership Summary Report, published alongside the Draft EIR, shows that the project is expected to generate between 11,500 to 15,600 daily transit trips (boardings). Ridership projections show that riders from the greater South Bay and Palos Verdes Peninsula would use the system to connect to the regional rail network.

1207-4 The commenter's opinion that the Hawthorne Option would be best for South Bay businesses is noted. An additional station along the Hawthorne Option was studied in the 2018 Supplemental Alternatives Analysis, and removed from further study at the request of

the City of Lawndale. Previous studies also examined routes to Del Amo Mall, but those options were screened out as they did not provide comparable ridership benefits.

1207-5 All alignments proposed on the Metro ROW include infrastructure improvements that would make all freight at-grade crossings alongside the light rail tracks eligible for quiet zone applications.

Submission 1208 Alkistis Tsitouri

1208-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1209 Kelly Lowe

1209-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1210 Laura Harder

1210-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1211 Kandi Hsin

1211-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1212 Jeff Patton

1212-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1213 Lin Van Gelder

1213-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1214 James Van Gelder

1214-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1215 Jan-Michael Sanchez

1215-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

1215-2 The commenter's support for the Metro ROW alignment is noted. Chapter 2, Description of the Locally Preferred Alternative, of the Final EIR, includes an updated schedule for the LPA. The project schedule and cost estimates will continue to be updated as the design advances. See MR-21: Cost Estimates and Schedule

Submission 1216 Emilie Hunter

1216-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1217 Pat Leighton

1217-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1218 Abraham Que

1218-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1219 Paul Yamada

1219-1 This project would provide alternatives to the busy I-405 corridor and also more transit options in this region by connecting to existing Metro rail lines, as well as two regional bus transit centers in Redondo Beach and Torrance. The 2023 Ridership Summary Report, published alongside the Draft EIR, shows that the project is expected to generate between 11,500 to 15,600 daily transit trips (boardings). See MR-15: Metro Ridership Forecasting Methodology. Metro published a summary of preliminary cost estimates and schedule in 2023, concurrent with the Draft EIR. The project construction costs range from $1.96 billion to $2.96 billion (as estimated in 2022) depending on the route and design configuration. See MR-21: Cost Estimates and Schedule.

Submission 1220 Celia Lee

1220-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

1220-2 This comment is noted. All comments have been shared with the Metro Board for their consideration. See response to comment 1220-1.

Submission 1221 Kaiulani Lie

1221-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

1221-2 Chapter 3.0, Environmental Impacts, of the Draft EIR, analyzes the project's environmental impacts. Section 4.20, Corrections and Additions, of the Final EIR, includes revisions to the Draft EIR analysis. The revisions do not result in significant new information or changes to the impact conclusions.

Submission 1222 Ernie Roberts

1222-1 The commenter's support for the Trench Option is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

1222-2 The potential for noise impacts is addressed in Section 3.6, Noise and Vibration, of the Draft EIR. Similar to the Trench Option, the LPA, and Hawthorne Option would fully grade separate light rail and, with mitigation, would result in less than significant noise impacts during operations. Regarding potential disruptions to businesses, under CEQA, economic impacts, such as financial effects on businesses, are not considered environmental impacts. Metro has created a Business Interruption Fund for major rail projects under construction in Los Angeles County to support the business community.

Submission 1223 Daniel Will

1223-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1224 Brian Quinn

1224-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

1224-2 CEQA does not require an analysis of safety in terms of crime, as it is not an environmental issue, and therefore the Draft EIR does not make any conclusions regarding this topic. Metro takes the safety and well-being of nearby communities very seriously. See MR-9: Light Rail Security and MR-18: Homelessness.

Submission 1225 Gregg DeNeui

1225-1 The commenter's support for the Trench Option is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

1225-2 The potential for noise impacts is addressed in Section 3.6, Noise and Vibration, of the Draft EIR. See MR-9: Light Rail Security and MR-18: Homelessness.

Submission 1226 Jimmy Gow

1226-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

1226-2 As described in Section 3.1, Transportation, of the Draft EIR, Project Feature PF-T-1: Construction Traffic Management Plan requires contractors to develop a construction traffic management plan. Metro and its contractors would coordinate with local businesses and residents as well as relevant jurisdictions to manage access and the effects of temporary closures and identify reasonable accommodations or alternatives, which could include limiting construction hours, providing alternate routes or temporary easements, or other strategies. These are identified as part of the preliminary engineering work and addressed in the development of the Construction Traffic Management Plan.

Submission 1227 Rhonda McNeil

1227-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

1227-2 CEQA does not require an analysis of safety in terms of crime, as it is not an environmental issue, and therefore the Draft EIR does not make any conclusions regarding this topic. Metro takes the safety and well-being of nearby communities very seriously. See MR-9: Light Rail Security. Regarding job creation, as discussed in Section 3.15, Public Services and Recreation, of the Draft EIR, although construction of the project would create additional jobs in the project area, construction workers would temporarily work in the area and would not likely relocate to the project area on a permanent basis. Additionally, a minimum of 40% of all project work hours would be local hire workers as per Metro's Local Hire Initiative.

Submission 1228 Kimberlee Ann James

1228-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1229 Jackson N. Henry

1229-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

1229-2 This commenter's support for the Metro ROW alignment and opposition to the Trench Option and Hawthorne Options is noted. Metro published a summary of preliminary cost estimates and schedule in 2023, concurrent with the Draft EIR. The project construction costs range from $1.96 billion to $2.96 billion (as estimated in 2022) depending on the route and design configuration. See MR-21: Cost Estimates and Schedule.

Submission 1230 Brian Getchius

1230-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

1230-2 As described on Page 3.15-17 of the Draft EIR, the Los Angeles County Sheriff Department's Transit Policing Division provides contract transit policing services to the Metro public transit system. Deputies provide transit police services for both the light rail and bus transportation systems throughout 1,433 square miles, where Metro provides transit service. Los Angeles County Sheriff Department deputies conduct routine patrols of Metro facilities and transit vehicles and respond to emergency calls placed on Metro's public transit system. Police departments not contracted with Metro are also available for 9-1-1 emergency responses. See MR-9: Light Rail Security and MR-11: Traffic Delay and Level-of-Service. See also the 2023 Transportation Detail Report, published concurrently with the Draft EIR, for discussion on traffic conditions. It includes intersections along Crenshaw Boulevard.

Submission 1231 Eric Chen

1231-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

1231-2 Chapter 2, Description of the Locally Preferred Alternative, of the Final EIR, includes an updated schedule for the LPA. The project schedule and cost estimates will continue to be updated as the design advances. See MR-21: Cost Estimates and Schedule.

Submission 1232 Mike Selfridge

1232-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

1232-2 The commenter's opposition to the project is noted. The project has secured funding from Measure R (2008), Measure M (2016), Transit Intercity Rail Capital Program (TIRCP) Grant from the California State Transportation Agency (CALSTA) Transit and Intercity Rail Capital Program, and 3% match contributions from local jurisdictions. Metro would continue to identify additional funding to support the project and close the funding gap, pending project approval.

Submission 1233 HL

1233-1 The commenter's support for the No Build Alternative is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

1233-2 CEQA does not require an analysis of safety in terms of crime, as it is not an environmental issue, and therefore the Draft EIR does not make any conclusions regarding this topic. Metro

takes the safety and well-being of nearby communities very seriously. See MR-9: Light Rail Security and MR-18: Homelessness.

1233-3 See response to Comment 1233-2.

1233-4 The 2023 Ridership Summary Report, published concurrently with the Draft EIR, shows that the project is expected to generate between 11,500 to 15,600 daily transit trips (boardings). See MR-15: Metro Ridership Forecasting Methodology. The commenter asserts the household incomes of residents in Redondo Beach, Torrance, and Lawndale are not similar to those of users on the Metro system, based on results of a survey. As described in the 2023 Project Need and Purpose Report, published concurrently with the Draft EIR, the project area contains communities that meet Metro's Equity Focus Communities (EFC) criteria, which include income, vehicle ownership, and ethnicity. For all three of these criteria, the greatest percentages of equity-related criteria within the project area are located in Lawndale, east of the Redondo Beach (Marine) Station; centrally, surrounding the South Bay Galleria; and in Torrance, to the west of the Torrance Transit Center. In addition to serving these communities, the project would also provide a regional benefit for all riders, by improving an alternative mode of access to the South Bay.

1233-5 Metro is committed to integrating safety into all Metro rail operations. The project would comply with relevant safety standards, including the California Manual on Uniform Traffic Control Devices, the California Department of Transportation Highway Design Manual, the Americans with Disabilities Act, and Metro's Grade Crossing Safety Policy. The LPA, Trench Option, and Hawthorne Option would fully grade separate light rail from all roadways, thereby avoiding potential conflicts with school-age pedestrians and cyclists. The presence of a station could also improve access to schools for residents and parents.

1233-6 See response to Comment 133-4.

Submission 1234 Michael Dillenback

1234-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1235 Patricia Miyoshi

1235-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1236 Christopher Rutte

1236-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

1236-2 The C Line Extension to Torrance Ridership Summary Report (2023a), available on the project's website, includes ridership forecasts. The project is estimated to serve between

11,500 and 15,600 daily project trips by 2045. The project has secured funding from Measure R (2008), Measure M (2016), Transit Intercity Rail Capital Program (TIRCP) Grant from the California State Transportation Agency Transit and Intercity Rail Capital Program, and 3% match contributions from local jurisdictions. Metro would continue to explore funding opportunities for the project.

Submission 1237 Richard Long

1237-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives. Both the Metro C and K Lines now connect to LAX.

Submission 1238 Enrique Garcia

1238-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1239 Louis Quaglietta

1239-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1240 Catherine Emmerson

1240-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1241 Jerri Holmgren

1241-1 The commenter's support for the Elevated/At-Grade Alignment is noted. See MR-1: Selection of Alternatives. The potential for noise impacts is addressed in Section 3.6, Noise and Vibration, of the Draft EIR.

Submission 1242 Charles A. Pineros

1242-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

1242-2 The Mary K. Giordano Regional Transit Center is located at 465 Crenshaw Boulevard, Torrance, CA.

Submission 1243 Ruth Ann Gray

1243-1 The commenter's support for the Elevated/At-Grade Alignment and the Trench Option and is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1244 Harder Munro

1244-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1245 Terry Engle

1245-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1246 D.J. Ponder

1246-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1247 Marilyn Deborah Maxwell

1247-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1248 Russell Tsuji

1248-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1249 Earl Nolan

1249-1 The commenter's support for the Hawthorne Option is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1250 Alfred Jung

1250-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1251 Mariana Amezcua

1251-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1252 Se Hyun Sung

1252-1 The commenter's support for the Trench Option is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1253 Bonnie Inskeep

1253-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1254 Michael J. Gibson

1254-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1255 Jerry Armstrong

1255-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1256 Micheal Hart

1256-1 The commenter's support for the Trench Option is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1257 Y. Mcleod

1257-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1258 Jessie Lee

1258-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1259 Jungok

1259-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1260 Keith Herbers

1260-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1261 Charles Diehl

1261-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1262 Cuna Chona

1262-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1263 Mark Williams

1263-1 The commenter's support for the Hawthorne Option is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1264 Shankar Pachari

1264-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1265 Ron Sapp

1265-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1266 Jim Childers

1266-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1267 Rebecca Tubbs

1267-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1268 Gabriel Ponciano

1268-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1269 Steven Lindsey

1269-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1270 Albert Castro

1270-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1271 Josh Standifer

1271-1 The commenter's support for the Hawthorne Option is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

1271-2 The commenter's support for the Hawthorne Option is noted. The project is designed to fit within the Metro ROW. See Appendix 2-A, Select Advanced Conceptual Engineering Drawings, of the Draft EIR and Final EIR Appendix B, Select Advanced Conceptual Engineering Drawings - Locally Preferred Alternative. Impacts related to wildlife were analyzed in Section 3.7, Biological Resources, of the Draft EIR. See MR-8: Light Rail and Freight Train Safety; and MR-10: Changes in Community Character.

Submission 1272 Owen

1272-1 The commenter's support for the Elevated/At-Grade Alignment and rail in general is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1273 Josh Stanton

1273-1 The commenter's support for the Hawthorne Option is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

1273-2 The commenter's support for the Hawthorne Option is noted. The project is designed to fit within the Metro ROW. See Appendix 2-A, Select Advanced Conceptual Engineering

Drawings, of the Draft EIR and Final EIR Appendix B, Select Advanced Conceptual Engineering Drawings - Locally Preferred Alternative. As part of this project, multi-use recreational paths would be added in several parts of the corridor, which would provide safe paths for recreational users. See MR-8: Light Rail and Freight Train Safety and MR-10: Changes to Community Character.

Submission 1274 Brendon Reyell

1274-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1275 Dale Case

1275-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1276 Kathy

1276-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1277 E. Atkins

1277-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1278 Jason T. Tam

1278-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1279 Marc Lawrence

1279-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

1279-2 The noise impacts of the Elevated/At-Grade Alignment, Trench Option, and Hawthorne Option are evaluated in detail in Section 3.6, Noise and Vibration, of the Draft EIR. The LPA is addressed in Chapter 4, Evaluation of Alternatives, of the Draft EIR. The noise impacts of a light rail system depend on many factors, including track technology, mitigation measures, and whether the alignment crosses streets at-grade. For this project, the Elevated/At-Grade Alignment includes at-grade light rail crossings that require warning bells and light rail train horns, which increase noise exposure in the surrounding neighborhoods. By contrast, the

LPA, Trench Option, and Hawthorne Option would fully separate the light rail from the street grid, eliminating the need for these audible warnings and significantly reducing operational noise impacts. With implementation of mitigation measures, including MM-NOI-2: Soundwalls, noise impacts would be reduced to less than significant with mitigation for LPA, Trench Option and Hawthorne Option.

Submission 1280 Michael Wermers

1280-1 The commenter's support for the Hawthorne Option is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1281 Alexandros S. Martinez

1281-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

1281-2 The commenter's support for the Metro ROW alignment is noted. The LPA, along with all alignments along the Metro ROW, directly connects to the Redondo Beach Transit Center.

Submission 1282 Diana Davis

1282-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1283 Bryan

1283-1 The commenter's support for the Elevated/At-Grade Alignment is noted. See MR-1: Selection of Alternatives. See the Executive Summary in the Draft EIR for a summary of the potential impacts on pages ES-1 through ES-50.

Submission 1284 Perry Shields

1284-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1285 Daniel

1285-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1286 Virgina Darnell

1286-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1287 Tejas Parmar

1287-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1288 L. Nakashima

1288-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1289 Dave and Rena Hayami

1289-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1290 Swee Woo

1290-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1291 Robert Boiles

1291-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

1291-2 This commenter's preference for the least expensive option is noted. Cost efficiency is one of the objectives on which the Metro Board made its LPA selection. See MR-21: Cost Estimates and Schedule.

Submission 1292 Jeff Wong

1292-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1293 Larry Turgeon

1293-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

1293-2 The project is designed to provide convenient access to the Redondo Beach Transit Center and Torrance Transit Center, which were selected based on extensive analysis of

connectivity and accessibility and community outreach. The stations would serve as key transit hubs, with existing local bus routes providing access to nearby destinations.

Submission 1294 Jose Dennis Alabaso

1294-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

1294-2 The commenter's support for the project and desire for an accelerated schedule is noted.

Submission 1295 Anonymous

1295-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1296 Sean Murphy

1296-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1297 Ton-Ming Chieh

1297-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1298 Benito Miranda

1298-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

1298-2 The project would provide a direct connection to the LAX Automated People Mover via the K Line.

Submission 1299 Anonymous

1299-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1300 Steve Chamberlain

1300-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1301 Bonnie Van Alphen

1301-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

1301-2 This commenter's preference for the least expensive option is noted. Cost efficiency is one of the objectives on which the Metro Board made its LPA selection. See MR-21: Cost Estimates and Schedule.

Submission 1302 Anonymous

1302-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1303 Noriko Fujita

1303-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1304 Harry & JoAnn Ross

1304-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1305 Susan LaMotte

1305-1 The commenter's support for the Elevated/At-Grade Alignment is noted. See MR-1: Selection of Alternatives. The 2023 Ridership Summary Report, published alongside the Draft EIR, shows that the project is expected to generate between 11,500 to 15,600 daily transit trips (boardings). Ridership projections show that riders from the greater South Bay and Palos Verdes will use the system to connect to the regional rail network. See MR-15: Metro Ridership Forecasting Methodology.

Submission 1306 Joseph A Spilka

1306-1 The commenter's support for the Elevated/At-Grade Alignment is noted. See MR-1: Selection of Alternatives. See also the 2023 Transportation Detail Report, published concurrently with the Draft EIR, for discussion on traffic conditions.

Submission 1307 Michael Stull

1307-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1308 Ron Botelho

1308-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

1308-2 The 2023 Ridership Summary Report, published alongside the Draft EIR, shows that the project is expected to generate between 11,500 to 15,600 daily transit trips (boardings). Ridership projections show that riders from the greater South Bay and Palos Verdes Peninsula would use the system to connect to the regional rail network. The project has secured funding from Measure R (2008), Measure M (2016), Transit Intercity Rail Capital Program (TIRCP) Grant from the California State Transportation Agency (CALSTA) Transit and Intercity Rail Capital Program, and 3% match contributions from local jurisdictions. Metro would continue to identify additional funding to support the project and close the funding gap, pending approval.

Submission 1309 Mr. & Mrs. Aguiar

1309-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

1309-2 See response to Comment 1309-1. Cost efficiency is one of the objectives on which the Metro Board made its LPA selection. See MR-21: Cost Estimates and Schedule.

Submission 1310 D. Fisher

1310-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1311 Chih Chang

1311-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1312 Anonymous

1312-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

1312-2 As described in Section 3.1, Transportation, of the Draft EIR, Project Feature PF-T-1: Construction Traffic Management Plan requires contractors to develop a Construction Traffic Management Plan (CTMP). Metro and its contractors would coordinate with local businesses and residents as well as relevant jurisdictions to manage access and the effects of temporary closures and identify reasonable accommodations or alternatives, which could

include limiting construction hours, providing alternate routes or temporary easements, or other strategies. These are identified as part of the preliminary engineering work and addressed in the development of the CTMP.

Submission 1313 Everett Kirsch

1313-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1314 Kikuchi Family

1314-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1315 Donald Nakamoto

1315-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1316 Beverly Findley

1316-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

1316-2 The Metro Board considered cost efficiency in selecting the LPA and will continue to consider that factor, among others, prior to reaching a final decision on the project. See MR-21: Cost Estimates and Schedule.

Submission 1317 Edmund & Kerry Cababa

1317-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1318 Mrs. Deborah DeLoud

1318-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1319 Craig Scdoris

1319-1 The commenter's support for the Elevated/At-Grade Alignment and desire for an accelerated schedule is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1320 Lynn Shirvandehi

1320-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

1320-2 This commenter's support for the Metro ROW alignment is noted. All comments have been shared with the Metro Board for their consideration. See response to Comment 1320-1.

Submission 1321 Bernas

1321-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

1321-2 This commenter's preference to reduce disruptions is noted. The Draft EIR analyzes the environmental impacts of all project options and alternatives. See the Draft EIR Executive Summary for a summary of all impacts, and the Final EIR Executive Summary for a summary of the LPA impacts.

Submission 1322 Dianne & Jerry Baltz

1322-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1323 Jenny Sakamoto

1323-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1324 Timothy McAkee

1324-1 The commenter's support for the Elevated/At-Grade Alignment is noted. See MR-1: Selection of Alternatives. Should the project be approved and advanced into construction, a minimum of 40% of all project work hours would be local hire workers as per Metro's Local Hire Initiative.

Submission 1325 Anonymous

1325-1 The commenter's opposition to the project is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1326 Janet Sieffert

1326-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

5.5 Responses to Individual Comments (Submission #1327-#1989)

Submission 1327 Frederick A. Mohit

1327-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1328 Tim Calkins

1328-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

1328-2 The commenter's opposition to the Hawthorne Option is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1329 Oliver King

1329-1 The commenter's support for either the Elevated/At-Grade Alignment or the Hawthorne Option is noted. The opposition to the Trench Option is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1330 T. Elder

1330-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1331 Helen Itabashi

1331-1 The commenter's support for the Trench Option is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

1331-2 The commenter states that the Trench Option is the best choice, although the comment also notes that the Trench Option and Elevated/At-Grade Alignment would bring more traffic and crime to Torrance. As explained on page 3.1-3 of the Draft EIR, traffic delay (often measured by level of service) is no longer permissible as a CEQA impact criterion and therefore this analysis and related topics are not addressed in the Draft EIR. See MR-11: Traffic Delay and Level-of-Service and the 2023 Transportation Detail Report, published concurrently with the Draft EIR, for a discussion of traffic conditions. The LPA and Trench Option are fully grade-separated from all roadways and would not increase vehicle delay compared to existing conditions. The Hawthorne Option is likewise grade-separated; however, its proposed changes in traffic signals and roadway modifications could affect circulation patterns, as described in MR-11: Traffic Delay and Level-of-Service. CEQA does not require an analysis of safety in terms of crime, as it is not an environmental issue, and therefore the Draft EIR does not make any conclusions regarding this topic. See MR-9: Light Rail Security.

Submission 1332 Susan Hale

1332-1 The commenter's opposition to the project is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1333 Francesco Aiello

1333-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1334 JoAnne Naka

1334-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1335 Sharon I.

1335-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

1335-2 The commenter's preferences and concerns have been noted. Regardless of alignment, Metro would comply with all applicable safety regulations, including those established by the California Public Utilities Commission and the Federal Railroad Administration, to ensure safe operations. The Metro Board will consider multiple factors in their final determination on the project, including environmental impacts, benefits, and costs. See MR-8: Light Rail and Freight Train Safety and MR-10: Changes to Community Character.

Submission 1336 L. Hawkes

1336-1 The commenter's opposition to the project is noted. See MR-1: Selection of Alternatives. The project has secured funding from Measure R (2008), Measure M (2016), TIRCP Grant from the California State Transportation Agency Transit and Intercity Rail Capital Program, and 3% match contributions from local jurisdictions. Metro is committed to the responsible use of public funds and to managing project costs efficiently, while continuing to pursue additional funding sources to support project delivery. See MR-21: Cost Estimates and Schedule.

Submission 1337 Julie Tuttle

1337-1 The commenter's opposition to the project is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives and MR-10: Changes to Community Character.

Submission 1338 Ros Barry

1338-1 The commenter's opposition to the project is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1339 Cheryl Petrucelli

1339-1 The commenter's opposition to the project is noted. See MR-1: Selection of Alternatives. The project has secured funding from Measure R (2008), Measure M (2016), TIRCP Grant from the California State Transportation Agency Transit and Intercity Rail Capital Program, and 3% match contributions from local jurisdictions. See MR-21: Cost Estimates and Schedule. Metro is committed to the responsible use of public funds and to managing project costs efficiently, while continuing to pursue additional funding sources to support project delivery. The 2023 Ridership Summary Report, published concurrently with the Draft EIR, shows that the project is expected to generate between 11,500 to 15,600 daily transit trips (boardings). See MR-15: Metro Ridership Forecasting Methodology.

Submission 1340 Kevin Brown

1340-1 The commenter selected all three boxes indicating support for the Elevated/At-Grade Alignment, the Trench Option, and the Hawthorne Option. See MR-1: Selection of Alternatives.

1340-2 The project's consistency with existing land use plans and zoning designations is assessed in Section 3.2, Land Use and Planning, of the Draft EIR. The project would not require zoning changes. Furthermore, land use and zoning decisions, including any potential zone changes, are under the jurisdiction of local agencies such as cities or counties. Metro does not have the authority to impose or prevent zoning changes. Local jurisdictions retain full control over their zoning decisions and any future changes would be subject to their respective public review and approval processes.

1340-3 Police services would be provided by the Los Angeles County Sheriff's Department (LASD) under Metro's existing contract service agreement with this agency. See MR-9: Light Rail Security. The project has secured funding from Measure R (2008), Measure M (2016), TIRCP Grant from the California State Transportation Agency Transit and Intercity Rail Capital Program, and 3% match contributions from local jurisdictions. Metro is committed to the responsible use of public funds and to managing project costs efficiently, while continuing to pursue additional funding sources to support project delivery. See MR-21: Cost Estimates and Schedule.

Submission 1341 Richard Rudshagen

1341-1 The commenter's opposition to the project is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1342 Gerri Yarborough

1342-1 Metro takes public safety very seriously. See MR-9: Light Rail Security and MR-18: Homelessness.

Submission 1343 J. Myatt

1343-1 The commenter's statement to take the light rail to Carson instead of Torrance is noted. Metro has considered multiple alignment options, starting with the 2009 Alternatives Analysis, which identified the C Line Extension to Torrance within the Metro ROW as a priority project. An extension further south past Torrance was considered, but currently does not have funding to be evaluated further.

Submission 1344 Dawson J.

1344-1 The commenter's opposition to the project is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives. Metro takes public safety very seriously. See MR-9: Light Rail Security.

1344-2 The 2023 Ridership Summary Report, published concurrently with the Draft EIR, shows that the project is expected to generate between 11,500 to 15,600 daily transit trips (boardings). See MR-15: Metro Ridership Forecasting Methodology. Comments related to Torrance Transit should be directed to the City of Torrance.

Submission 1345 Michael Lituin

1345-1 The commenter's opposition to money going to public transportation is noted. The project has secured funding from Measure R (2008), Measure M (2016), a Transit and Intercity Rail Capital Program (TIRCP) Grant from the California State Transportation Agency Transit, and 3% match contributions from local jurisdictions. Metro is committed to the responsible use of public funds and to managing project costs efficiently, while continuing to pursue additional funding sources to support project delivery. See MR-21: Cost Estimates and Schedule.

Submission 1346 Judith Shoemaker

1346-1 The commenter's opposition to the project is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

1346-2 The commenter's preference for an improved bus system is noted. A High-Frequency Bus Alternative on local arterials is evaluated in Chapter 4, Evaluation of Alternatives, of the Draft EIR.

Submission 1347 Don White

1347-1 The commenter's opposition to the project is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1348 Wilmes LLC

1348-1 The commenter checked the box supporting the Elevated/At-Grade Alignment but also expressed opposition to all choices. See MR-1: Selection of Alternatives.

1348-2 The commenter's opposition to the project is noted. All comments have been shared with the Metro Board for their consideration.

Submission 1349 Priscilla Sena

1349-1 The commenter's opposition to the project is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1350 Scott Tan

1350-1 The commenter's opposition to the project is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1351 Laurie Lehmer

1351-1 Metro takes public safety very seriously. See MR-9: Light Rail Security.

Submission 1352 John & Emeli Anagnost

1352-1 The commenter's opposition to the project is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives. Metro takes public safety very seriously. See MR-9: Light Rail Security.

Submission 1353 Susan Gibson

1353-1 The commenter checked the box supporting the Trench Option but also expressed opposition to all choices. See MR-1: Selection of Alternatives.

1353-2 The commenter's opposition to the project is noted. The 2023 Ridership Summary Report, published alongside the Draft EIR, shows that the project is expected to generate between 11,500 to 15,600 daily transit trips (boardings). See MR-15: Metro Ridership Forecasting Methodology.

Submission 1354 Anonymous

1354-1 The commenter's opposition to the project is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

1354-2 Metro takes public safety very seriously. See MR-9: Light Rail Security. The project has secured funding from Measure R (2008), Measure M (2016), a Transit and Intercity Rail Capital Program (TIRCP) Grant from the California State Transportation Agency Transit, and 3% match contributions from local jurisdictions. Metro is committed to the responsible use of public funds and to managing project costs efficiently, while continuing to pursue additional funding sources to support project delivery. See MR-21: Cost Estimates and

Schedule. The 2023 Ridership Summary Report, published concurrently with the Draft EIR, shows that the project is expected to generate between 11,500 to 15,600 daily transit trips (boardings). See MR-15: Metro Ridership Forecasting Methodology.

Submission 1355 Terrian Ferren

1355-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

1355-2 The commenter's opposition to rail in Torrance is noted. All comments have been shared with the Metro Board for their consideration.

1355-3 Metro takes public safety very seriously. See MR-9: Light Rail Security.

Submission 1356 D. Weirick

1356-1 The commenter's support for the No Project Alternative is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

1356-2 The 2023 Ridership Summary Report, published alongside the Draft EIR, shows that the project is expected to generate between 11,500 to 15,600 daily transit trips (boardings). See MR-15: Metro Ridership Forecasting Methodology and MR-18: Homelessness.

Submission 1357 Concerned Citizen

1357-1 The commenter's opposition to the project is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1358 Ray K

1358-1 A High-Frequency Bus Alternative on local arterials, which is not "fixed" light rail infrastructure, is evaluated in Chapter 4, Evaluation of Alternatives, of the Draft EIR. See MR-1: Selection of Alternatives.

Submission 1359 Michael Mitani

1359-1 The commenter's stated support for public transit and selection of the Elevated/At-Grade Alignment, the Trench Option, and the Hawthorne Option without preference, are noted. All comments have been shared with the Metro Board for their consideration.

Submission 1360 Richard Beaver

1360-1 The commenter's recommendation for a subway in Redondo Beach is noted. See Table 4.2-1, Summary of Alternatives Considered and Rejected, on page 4-2 of the Draft EIR, which explains that a deep bore tunnel alignment was considered but rejected because it was expected to have significantly higher costs, higher-real estate needs, and increased construction-related impacts without corresponding benefits compared to a trench configuration. See also MR-1: Selection of Alternatives.

Submission 1361 Anonymous

1361-1 You can reference a map illustrating the Elevated/At-Grade Alignment, Trench Option, and Hawthorne Option on the Metro project website, as well as in different sections of the Final EIR. The web maps are interactive and can be zoomed in for detailed viewing. If accessing the online maps is difficult, printed maps with larger formats can be made available at the project's outreach events or by contacting Metro directly at greenlineextension@metro.net. Additionally, Metro staff members are available to assist with reviewing maps in person at public meetings or by phone at 213-922-4004 to help ensure the maps are accessible for all.

The Torrance Transit Center is not included in the map since it is not a Metro station, but the proposed light rail station would be adjacent to the Torrance Transit Center and is included in the project maps in Chapter 2, Project Description, of the Draft EIR and Chapter 2, Description of the Locally Preferred Alternative, of the Final EIR.

Submission 1362 Sudduth

1362-1 The commenter's opposition to the project is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

1362-2 The project has secured funding from Measure R (2008), Measure M (2016), a Transit and Intercity Rail Capital Program (TIRCP) Grant from the California State Transportation Agency Transit, and 3% match contributions from local jurisdictions. Metro is committed to the responsible use of public funds and to managing project costs efficiently, while continuing to pursue additional funding sources to support project delivery. See MR-21: Cost Estimates and Schedule and MR-18: Homelessness.

Submission 1363 F. Ron

1363-1 The commenter's support for the Elevated/At-Grade Alignment and Hawthorne Option is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

1363-2 None of the alignments evaluated in the Draft EIR would require roadway reconfigurations that would eliminate general-purpose traffic lanes. However, the Hawthorne Option would involve modifications to Hawthorne Boulevard to accommodate the support columns for the elevated guideway. This includes reducing the number of northbound left-hand turn lanes at 177th Street from two to one. For additional information, see MR-11: Traffic Delay and Level-of-Service. The LPA, Trench Option, and Hawthorne Option would fully grade separate the light rail from all roadways.

1363-3 See response to Comment 1363-1. An option to connect to the Del Amo Mall was considered during the 2021 scoping period for the project, but was not studied as other transit lines connect to the mall and the route would not connect to the City's transit center.

Submission 1364 Anonymous

1364-1 The commenter's opposition to the project is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1365 Richard Foryell

1365-1 The commenter's opposition to the project is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1366 Charles Bauman

1366-1 The commenter's opposition to the project is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1367 F. Blaek

1367-1 The commenter marked boxes for the Elevated/At-Grade Alignment, the Trench Option, and the Hawthorne Option. See MR-1: Selection of Alternatives.

1367-2 The commenter's concerns regarding project costs and values are noted. The 2023 Ridership Summary Report, published concurrently with the Draft EIR, shows that the project is expected to generate between 11,500 to 15,600 daily transit trips (boardings). See MR-15: Metro Ridership Forecasting Methodology; see MR-19: Project Benefits, and MR-21: Cost Estimates and Schedule.

Submission 1368 Barry Buth

1368-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

1368-2 For clarification, commuter rail would not run on this track. Metro light rail trains would operate within the Metro ROW. As explained on page 3.1-3 of the Draft EIR, traffic delay (often measured by level of service) is no longer permissible as a CEQA impact criterion, and therefore this analysis and related topics are not addressed in the Draft EIR. See MR-11: Traffic Delay and Level-of-Service and the 2023 Transportation Detail Report, published concurrently with the Draft EIR, for a discussion of traffic conditions. The LPA and Trench Option light rail guideway is fully grade-separated from all roadways and would not increase vehicle delay compared to existing conditions. CEQA does not require an analysis of safety in terms of crime, as it is not an environmental issue, and therefore the Draft EIR does not make any conclusions regarding this topic. See MR-9: Light Rail Security.

Submission 1369 Shirley Mitchell

1369-1 The commenter's opposition to the project is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

1369-2 The 2023 Ridership Summary Report, published concurrently with the Draft EIR, shows that the project is expected to generate between 11,500 to 15,600 daily transit trips (boardings). See MR-15: Metro Ridership Forecasting Methodology and MR-18: Homelessness.

Submission 1370 Vicki Smith

1370-1 The commenter's opposition to light rail in Torrance is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1371 Mrs. David C. Dupuls

1371-1 Comments related to sidewalk construction should be directed to the city with jurisdiction.

Submission 1372 Karen Robinson

1372-1 The commenter's support for the Elevated/At-Grade Alignment and Hawthorne Option is noted. See MR-1: Selection of Alternatives. The cities of Lawndale, Redondo Beach, and Torrance plan, construct, and maintain sidewalks within their respective jurisdiction.

1372-2 The 2023 Ridership Summary Report, published concurrently with the Draft EIR, shows that the project is expected to generate between 11,500 to 15,600 daily transit trips (boardings). See MR-15: Metro Ridership Forecasting Methodology.

1372-3 The commenter's concern about project costs and value are noted. See MR-19: Project Benefits and MR-21: Cost Estimates and Schedule.

Submission 1373 Rick & Lori Kamrath

1373-1 The commenter's opposition to the project is noted. See MR-1: Selection of Alternatives. This is not a vote but a request to the public to participate in the environmental review process required by CEQA. The Metro Board will consider the findings of the Final EIR, along with all public comments and community input received throughout the process, before making any final decision on the project. Potential impacts associated with all the project alternatives and options are summarized in Chapter 4, Evaluation of Alternatives, of the Draft EIR.

Submission 1374 Member of Madrone Homeowner Assoc.

1374-1 The commenter's opposition to light rail in Torrance is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1375 Vicke Wallace

1375-1 The commenter's support for the Elevated/At-Grade Alignment is noted. See MR-1: Selection of Alternatives. All comments have been shared with the Metro Board for their consideration.

Submission 1376 Kathleen Kenny

1376-1 The commenter marked boxes indicating support for the Elevated/At-Grade Alignment and Hawthorne Option, although also states unhappiness with the project. Metro takes public safety very seriously. See MR-9: Light Rail Security.

Submission 1377 J. Armandores

1377-1 The commenter's opposition to light rail in Torrance is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1378 Anonymous

1378-1 The commenter's opposition to light rail in Torrance is noted. See MR-1: Selection of Alternatives. Metro takes public safety very seriously. See MR-9: Light Rail Security and MR-18: Homelessness.

Submission 1379 Anonymous

1379-1 The commenter marked a box indicating support for the Elevated/At-Grade Alignment, although also states opposition to the project. See MR-1: Selection of Alternatives.

1379-2 See response to Comment 1379-1.

Submission 1380 Anonymous

1380-1 The commenter's opposition to the project is noted. Metro takes public safety very seriously. See MR-9: Light Rail Security.

Submission 1381 James Lews

1381-1 The commenter's opposition to light rail and preference for a bus terminal is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

1381-2 The project would provide benefits to Torrance. The project would connect to the new regional bus transit center in Torrance. See MR-17: Response to Torrance Community Letter and MR-19: Project Benefits. A High-Frequency Bus Alternative is discussed in Chapter 4, Evaluation of Alternatives, of the Draft EIR.

Submission 1382 Anonymous

1382-1 This commenter's opposition to the project has been noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1383 Ernest Yuska

1383-1 The commenter's support for the Hawthorne Option is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

1383-2 See Section 3.6, Noise and Vibration, of the Draft EIR, for a thorough analysis of the noise and vibration impacts of the three light rail alignment options, as well as mitigation measures to reduce the noise and vibration impacts. The Metro Board selected an LPA for purposes of the Final EIR. The LPA, Trench Option, and Hawthorne Option significantly reduce noise impacts compared to the Elevated/At-Grade Alignment because they avoid the

at-grade crossings at 170th and 182nd Streets. By grade-separating the light rail from all roadways, the LPA, Trench Option, and Hawthorne Option remove the need for audible warning at light rail crossings, such as routine train horns and crossing bells. As detailed in Chapter 4, Evaluation of Alternatives, of the Draft EIR, and Chapter 4, Corrections and Additions, of the Final EIR, the noise and vibration impacts of the LPA would be comparable to those of the Trench Option.

Submission 1384 Jon R.

1384-1 The commenter's support for the project is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1385 Carol Vega

1385-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

1385-2 The commenter states opposition to the project and also confirms preference for the Elevated/At-Grade Alignment. The project is partially funded by Measure R, as well as Measure M, another ballot measure passed by over 71% of voters in Los Angeles County to fund mobility projects.

Submission 1386 Leanna Smith

1386-1 The commenter's opposition to the project is noted. All comments have been shared with the Metro Board for their consideration. Metro takes public safety very seriously. See MR-9: Light Rail Security.

Submission 1387 Sharon L. Guzman

1387-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives. Metro takes public safety very seriously. See MR-9: Light Rail Security.

Submission 1388 Debre Cowrin

1388-1 The commenter's opposition to the project is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives. Metro takes public safety very seriously. See MR-9: Light Rail Security.

Submission 1389 David Ortiz

1389-1 The commenter's opposition to the project is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives and MR-18: Homelessness.

Submission 1390 Monica Steele

1390-1 The commenter's opposition to the project is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

1390-2 Metro takes public safety very seriously. See MR-9: Light Rail Security.

Submission 1391 M. Page, LCSW, BCD

1391-1 The commenter's support for the project is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives and MR-18: Homelessness.

Submission 1392 Judith Lanfried

1392-1 The commenter's opposition to the project is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives. Metro takes public safety very seriously. See MR-9: Light Rail Security and MR-18: Homelessness.

Submission 1393 Miriam Lengle

1393-1 The commenter marked boxes expressing support for all light rail alignments. See MR-1: Selection of Alternatives.

Submission 1394 Carolyn Lewis (Trustee for Althea Boehm)

1394-1 The commenter's opposition to light rail in Torrance is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives and MR-10: Changes to Community Character.

Submission 1395 Craig Stanton

1395-1 South Bay Estates is included in the Draft EIR's noise and vibration analysis as Clusters G27 through G30. As shown on Figure 3.6-23 of the Draft EIR, a soundwall is proposed along the eastern boundary of the Metro ROW near South Bay Estates and would be required by Mitigation Measure MM-NOI-2: Soundwalls. The soundwall locations are also shown in Table 3.6-26 of the Draft EIR. Operational noise impacts at Clusters G27 through G30 would be less than significant with mitigation.

Submission 1396 Sherry Roberts

1396-1 The commenter's opposition to the project is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

1396-2 See response to Comment 1396-1. As explained on page 3.1-3 of the Draft EIR, traffic delay (often measured by level of service) is no longer permissible as a CEQA impact criterion and therefore this analysis and related topics are not addressed in the Draft EIR. See MR-11: Traffic Delay and Level-of-Service and the 2023 Transportation Detail Report, published concurrently with the Draft EIR, for a discussion of traffic conditions. Neither the LPA nor the

Trench Option would increase vehicle delay compared to existing conditions, as both alignments fully grade separate the light rail from all roadways and do not require modifications to existing intersections or traffic lanes.

Submission 1397 T. Fox

1397-1 Metro takes public safety very seriously. See MR-9: Light Rail Security and MR-18: Homelessness.

Submission 1398 Sofia

1398-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

1398-2 The commenter's preference for the No Build Alternative is noted. All comments have been shared with the Metro Board for their consideration.

Submission 1399 Glass

1399-1 Metro takes public safety very seriously. See MR-9: Light Rail Security.

1399-2 The commenter's opposition to the project in Torrance is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1400 Mark and Diana

1400-1 This commenter's support for the Hawthorne Option is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

1400-2 This commenter's support for elevated rail is noted. All comments have been shared with the Metro Board for their consideration.

Submission 1401 Linda Mandel

1401-1 This commenter's support for the Hawthorne Option is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1402 Paul Halpern

1402-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

1402-2 Metro values public participation and input. All comments received on the Draft EIR during the public comment period are reviewed and considered as part of the preparation of the Final EIR. The Metro Board will make a decision on the project with consideration of the Final EIR and all public comments and feedback received during the engagement.

Submission 1403 Katherine McKinney

1403-1 This commenter's support for the Trench Option is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1404 Keith Lee

1404-1 The commenter's support for the ROW alignment and secondary support for the Trench Option is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

1404-2 See response to Comment 1404-1.

Submission 1405 Ismat Madhani

1405-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1406 Kevin Morrow

1406-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

1406-2 All light rail options and alternatives analyzed in the Draft EIR provide a direct connection to the LAX/Metro Transit Center. When the project opens, it would operate as part of the K Line, traveling north-south between the Expo/Crenshaw Station and the proposed station at Torrance. It would connect to the LAX/Metro Transit Station, providing service to LAX. The C (Green) Line currently travels east/west between the LAX/Metro Transit Station and the Norwalk Station.

Submission 1407 Fred M. Gravett

1407-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1408 Robert Tashiro

1408-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1409 Ryan Moon

1409-1 The commenter's support for the Trench Option is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

1409-2 See response to Comment 1409-1. The environmental impacts of each option and alternative were analyzed in Chapter 3 of the Draft EIR. See the Executive Summary in the Draft EIR for a summary of the impacts of each project option.

Submission 1410 Cynthia Angel

1410-1 The commenter's support for the Hawthorne Option is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1411 Bob Habel

1411-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1412 Charlene Rhodus

1412-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1413 Michael Mahkorn

1413-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1414 Kirk Jensen

1414-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1415 Lonnie Nakasone

1415-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

1415-2 As described in Section 3.9, Hazards and Hazardous Materials, of the Draft EIR, a Phase I Site Investigation was conducted for the length of the project to determine the presence of contaminated soils that may be disturbed by the project. As noted in Section 3.9-4.4 of the Draft EIR, Project Feature PF-HHM-3: Property Acquisition Phase II Site Investigation would require a Phase II Site Investigation to be conducted prior to construction during the preliminary engineering phase for sites that would be used for the project. If the Phase II Site Investigation concludes that a site to be acquired/utilized by the project is contaminated, Project Feature PF-HHM-3: Property Acquisition Phase II Site Investigation requires that remediation or corrective action (e.g., removal of contamination, in-situ treatment, capping) be conducted prior to or during construction in accordance with

applicable regulations. Additionally, Project Feature PF-HHM-5: Disposal of Groundwater would ensure that contaminated groundwater would be managed appropriately according to federal and state regulations.

Submission 1416 Christian Chlup

1416-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1417 Robin Eisenberg

1417-1 The commenter's support for the Hawthorne Option is noted. All comments have been shared with the Metro Board for their consideration. The project is proposed by Metro and not the City of Torrance. See MR-1: Selection of Alternatives.

Submission 1418 Daniel Evans

1418-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1419 Robert Feldman

1419-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

1419-2 The commenter's support for the Metro ROW alignments is noted. All comments have been shared with the Metro Board for their consideration.

Submission 1420 Yogesh Patel

1420-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1421 Brandon Beers

1421-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1422 Lesli Curry

1422-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1423 Shatiana Bedgood

1423-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1424 Dave Sato

1424-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1425 Gary Hawkins

1425-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

1425-2 The commenter expresses support for the Elevated/At-Grade Alignment over the Trench Option and Hawthorne Option, based on costs, noise, and convenience considerations. See response to Comment 1425-1.

Submission 1426 Simon Hsu

1426-1 The commenter's support for the Hawthorne Option is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1427 Michael McGee

1427-1 The commenter's support for the Hawthorne Option is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

1427-2 A station option along Hawthorne Boulevard in Lawndale had been evaluated in the 2018 Supplemental Alternatives Analysis, but was eliminated from further consideration at the request of the City of Lawndale. The South Bay Galleria Station would provide access to the South Bay Galleria and shopping area adjacent to the station area.

Submission 1428 Wayne Chen

1428-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1429 K. Sinn

1429-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

1429-2 The Trench and Hawthorne Options were studied in direct response to requests from local jurisdictions and the public to evaluate alternatives to the Metro ROW. The Draft EIR evaluates the environmental impacts of each alignment studied in accordance with CEQA. The Draft EIR does not evaluate costs or broader economic and social considerations, which are not required under CEQA.

However, those additional factors were considered by Metro outside of the EIR, as documented in public Metro Board reports published in September 2023 and April 2024. These reports, which are available on the project website, summarize the opportunities and challenges associated with each alignment. The Metro Board considered these factors, along with the environmental analysis in the Draft EIR and public feedback, in selecting the LPA in May 2024.

The Metro Board will consider the findings of the Final EIR, along with all public comments and community input received throughout the process, before making any final decision on the project.

Submission 1430 Adair Johnson

1430-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1431 Walt Lapovich

1431-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1432 Rajakumar Ganesan

1432-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

1432-2 The commenter's support for an at-grade alignment within the Metro ROW due to cost and traffic concerns is noted. All comments have been shared with the Metro Board for their consideration.

Submission 1433 Angeline Diana Velu

1433-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

1433-2 The commenter's support for the Elevated/At-Grade Alignment due to cost and traffic concerns is noted. All comments have been shared with the Metro Board for their consideration.

Submission 1434 Tim Mochizuki

1434-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1435 Roxanne Morrison

1435-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1436 Nick Morrison

1436-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1437 Sandy Kast

1437-1 The commenter's support for the Hawthorne Option is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1438 Sam Lee

1438-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

1438-2 The commenter's recommendation for Metro to select the most cost-efficient project is noted. All comments have been shared with the Metro Board for their consideration. Metro takes public safety very seriously. See MR-9: Light Rail Security.

Submission 1439 Erika Magana

1439-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1440 Ronald Cline

1440-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1441 Christopher J. Spitzer

1441-1 The commenter's support for the Trench Option is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1442 Janet Closs

1442-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1443 Dr. Eric Homier

1443-1 The commenter's support for the Hawthorne Option is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

1443-2 See response to Comment 1443-1. Metro understands concerns regarding property values. However, under CEQA, economic impacts such as changes in property values are not considered environmental impacts. The Draft EIR focuses on physical environmental impacts and measures to mitigate them, as required by CEQA. To address questions and concerns on property values, Metro has prepared more information. See MR-14: Property Values and Impacts to Businesses. Also see MR-10: Changes to Community Character and MR-16: Response to Lawndale and Redondo Beach Community Letter.

Submission 1444 Scott Robertson

1444-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1445 Franco Macchia

1445-1 The commenter's support for the Trench Option is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

1445-2 The commenter's opposition to the Hawthorne Option is noted. All comments have been shared with the Metro Board for their consideration.

Submission 1446 Anjali Bhardwaj

1446-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

1446-2 Potential impacts associated with the Elevated/At-Grade Alignment are summarized in Chapter 4, Evaluation of Alternatives, of the Draft EIR. Before making a final determination on the project, the Metro Board will review the comments and responses included in the Final EIR and will consider multiple factors, including environmental impacts, benefits and costs. See MR-21: Cost Estimates and Schedule.

Submission 1447 Carol Gilles

1447-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

1447-2 Metro does not collect data on Torrance Transit usage as Torrance Transit falls under the jurisdiction of the City of Torrance rather than Metro. For the light rail extension, the 2023 Ridership Summary Report, published alongside the Draft EIR, shows that the project is expected to generate between 11,500 to 15,600 daily transit trips (boardings). See MR-15: Metro Ridership Forecasting Methodology.

Submission 1448 Marcus

1448-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1449 Allison Madrid

1449-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1450 Benjamin Madrid

1450-1 The commenter's support for the Trench Option is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

1450-2 The commenter's preference for both the light rail and freight rail tracks trenched is noted. All comments have been shared with the Metro Board for their consideration.

Submission 1451 Emilio Moyers

1451-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1452 Jim Steenhoek

1452-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1453 Huali Tian and Phillip Harris

1453-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1454 James Kinnings

1454-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1455 Bill Tymczyszyn

1455-1 The commenter's opposition to the project is noted. See MR-1: Selection of Alternatives. The 2023 Ridership Summary Report, published concurrently with the Draft EIR, shows that the project is expected to generate between 11,500 to 15,600 daily transit trips (boardings). See MR-15: Metro Ridership Forecasting Methodology.

Submission 1456 Stanley Paez

1456-1 The commenter's support for the Trench Option is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1457 Stanley Paez

1457-1 The commenter's support for the Trench Option is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1458 Marilyn Rafkin

1458-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1459 Bryon Sargent

1459-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1460 Louis Lansang

1460-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1461 Michele Smith

1461-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

1461-2 The 2023 Ridership Summary Report, published concurrently with the Draft EIR, shows that the project is expected to generate between 11,500 to 15,600 daily transit trips (boardings). See MR-15: Metro Ridership Forecasting Methodology.

Submission 1462 Eileen Dann

1462-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1463 Cynthia Baran

1463-1 The commenter's support for the Hawthorne Option is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

1463-2 The commenter's opposition to the Metro ROW alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-10: Changes to Community Character.

Submission 1464 Darren Bracken

1464-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives. Metro is designing the terminus station at the Torrance Transit Center to allow the line to continue further south, should funding become available in the future. Potential extensions from the Torrance Transit Center to San Pedro, Long Beach, and the Los Angeles/Orange County line are included in the unfunded portion of the 2009 Metro Long Range Transportation Plan. Metro may consider these projects in the future, if additional funding becomes available.

Submission 1465 Cheryl Neese

1465-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1466 Ken Yang

1466-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1467 Johnny Rodriguez

1467-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1468 Grace Eze

1468-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1469 Debby Zagorin

1469-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1470 Marshall Holladay

1470-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

1470-2 The commenter's support for a Metro ROW alignment is noted. All comments have been shared with the Metro Board for their consideration. Metro takes public safety very seriously. See MR-9: Light Rail Security and MR-10: Changes to Community Character.

Submission 1471 Kathryn Wathen

1471-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

1471-2 Metro strives to complete projects on time and within estimated budgets. See MR-21: Cost Estimates and Schedule.

Submission 1472 U.A. Garred Sexton

1472-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

1472-2 Metro strives to complete projects on time and within estimated budgets. See MR-21: Cost Estimates and Schedule.

Submission 1473 Erik Gara

1473-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1474 Norris Blake

1474-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1475 N.

1475-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1476 Victor Kiuhan

1476-1 The commenter's support for the Hawthorne Option is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

1476-2 Metro has worked diligently to develop feasible and effective mitigation measures to address the potentially significant impacts of the project. See MR-10: Changes to Community Character.

1476-3 The commenter's support for the Hawthorne Option and secondary support for the Trench Option is noted. All comments have been shared with the Metro Board for their consideration. See responses to Comments 1476-1 and 1476-2.

1476-4 See response to Comment 1476-3. Previous studies also examined routes to Del Amo Mall, but those options were screened out as they did not provide ridership benefits.

Submission 1477 Gary Sisson

1477-1 The commenter's support for the Hawthorne Option is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

1477-2 As discussed in Section 3.2, Land Use and Planning, of the Draft EIR, the Metro ROW alignments would not physically divide a community because residents would still be able to cross the Metro ROW at all existing designated rail crossings located at Inglewood Avenue, Manhattan Beach Boulevard, 159th, 160th, 161st, 162nd, 170th, and 182nd Streets. Land uses would not be altered so as to isolate anyone part of the community from the other.

Submission 1478 Cynthia Benon

1478-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1479 Dan

1479-1 The commenter's opposition to light rail in Torrance is noted. See MR-1: Selection of Alternatives. As explained on page 3.1-3 of the Draft EIR, traffic delay (often measured by

level of service) is no longer permissible as a CEQA impact criterion and therefore this analysis and related topics are not addressed in the Draft EIR. See MR-11: Traffic Delay and Level-of-Service and the 2023 Transportation Detail Report, published concurrently with the Draft EIR, for a discussion of traffic conditions. The LPA and Trench Option light rail guideway is fully grade-separated from all roadways, and would not increase vehicle delay compared to existing conditions. Metro takes public safety very seriously. See MR-9: Light Rail Security and MR-18: Homelessness.

Submission 1480 Chris Jenne

1480-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1481 Steve

1481-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1482 Huong Do

1482-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1483 Kazuhiro Tominaga

1483-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1484 Don Hanson

1484-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1485 Mohammad Sarfaraz Siddiqui

1485-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

1485-2 The commenter's support for the Metro ROW alignment is noted. All comments have been shared with the Metro Board for their consideration.

Submission 1486 Dawn Ng

1486-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1487 William M. Weed

1487-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1488 Denise Weed

1488-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1489 Thomas N. Bailey

1489-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1490 Zubiar

1490-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1491 Evelyn Kelly

1491-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1492 Wayne Nakatsu

1492-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1493 Ron Kawasaki

1493-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1494 Isabel Balboa

1494-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives. Metro has worked diligently to develop feasible and effective mitigation measures to address the potentially significant impacts of the project.

Submission 1495 Lee Huniu

1495-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1496 Derrick Yamauchi

1496-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1497 Diana Yamauchi

1497-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1498 Gary Motowaki

1498-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1499 Michael Hikido

1499-1 The commenter's opposition to the light rail in Torrance is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

1499-2 Metro takes public safety very seriously. See MR-9: Light Rail Security.

1499-3 Metro is committed to integrating safety into all Metro rail operations. The project would comply with relevant safety standards, including the California Manual on Uniform Traffic Control Devices, the California Department of Transportation Highway Design Manual, the Americans with Disabilities Act, and Metro's Grade Crossing Safety Policy. The LPA, Trench Option, and Hawthorne Option light rail guideway would be fully grade-separated from all roadways, thereby avoiding potential conflicts with school-age pedestrians and cyclists. See MR-8: Light Rail and Freight Train Safety.

1499-4 See response to Comment 1499-1.

1499-5 The commenter's preference for a bus lane is noted. All comments have been shared with the Metro Board for their consideration. A High-Frequency Bus Alternative is evaluated in Chapter 4, Evaluation of Alternatives, of the Draft EIR.

Submission 1500 Jaycob

1500-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1501 John V. Shaw

1501-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1502 Cecelia Ruiz

1502-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1503 Lauren Lopez

1503-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1504 Barbara Asada

1504-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

1504-2 The project has secured funding from Measure R (2008), Measure M (2016), TIRCP Grant from the California State Transportation Agency Transit and Intercity Rail Capital Program, and 3% match contributions from local jurisdictions. Metro is committed to the responsible use of public funds and to managing project costs efficiently, while continuing to pursue additional funding sources to support project delivery. See MR-21: Cost Estimates and Schedule.

Submission 1505 Todd Zylman

1505-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1506 Dweejal Torado

1506-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

1506-2 The proposed stations are located at the Redondo Beach Transit Center or South Bay Galleria and Torrance Transit Center. The proposed stations were selected based on proximity to activity centers, ridership potential, ability to provide seamless and efficient service, and physical fit. Metro does not have plans to add another station at this time.

Submission 1507 Dorota Wiercinska

1507-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1508 Sean O'Connell

1508-1 The commenter's support for the Trench Option is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1509 Linh Tu

1509-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

1509-2 Metro strives to complete projects on time and within estimated budgets. See MR-21: Cost Estimates and Schedule.

Submission 1510 Judy Chai

1510-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1511 Pei Shao

1511-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1512 Traci Barr

1512-1 The commenter's opposition to the project is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1513 Michael Van Dyke

1513-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1514 Amber

1514-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1515 Benjamin

1515-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1516 Anna Silhavy

1516-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1517 Mika Yukimura

1517-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

1517-2 As described in Section 3.10, Hydrology and Water Quality, of the Draft EIR, subsections 3.10-4.4 and 3.10-4.6, none of the alignment options evaluated would alter drainage patterns in manner that could result in flooding or redirect flood flows. Each alignment option would include integrated stormwater management systems designed to address changes in impervious surfaces and ensure compliance with applicable stormwater management regulations. These systems must be designed to accommodate stormwater runoff volumes associated with current and projected conditions, including the potential for more severe weather patterns. Therefore, impacts related to flooding or redirected flood flows would be less than significant for each alignment option. As discussed in Chapter 4, Evaluation of Alternatives, of the Draft EIR, Subsection 4.5-3.10, the hydrology and water quality impacts of the LPA would be similar to those of the Trench Option and would be less than significant.

Submission 1518 Mauricio Padilla

1518-1 This commenter's opposition to light rail in the South Bay but a preference for the Elevated/At-Grade Alignment is noted. See MR-1: Selection of Alternatives. Metro takes public safety very seriously. See MR-9: Light Rail Security and MR-18: Homelessness.

Submission 1519 Sandhya Pathak

1519-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1520 Monique Sharf

1520-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1521 Nicolas Cerveaux

1521-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1522 Ray Licon

1522-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1523 John Alter

1523-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1524 Chris Alter

1524-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1525 Myra Masuyama

1525-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1526 Sylvia Wagner

1526-1 The commenter's support for the Trench Option is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1527 Tina Wu

1527-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1528 Nancy Carr

1528-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1529 Natalie Brecher

1529-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1530 Sandeep Pangala

1530-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1531 Gina Gualtiere

1531-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1532 Russel Lear

1532-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1533 Michael Hering

1533-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

1533-2 The commenter's opposition to the project and support for protected bike lanes is noted. The project would provide benefits to Torrance. The project would connect to the new regional bus transit center in Torrance. See MR-17: Response to Torrance Community Letter and MR-19: Project Benefits. The 2023 Ridership Summary Report, published concurrently with the Draft EIR, shows that the project is expected to generate between 11,500 to 15,600 daily transit trips (boardings). See MR-15: Metro Ridership Forecasting Methodology. See response to Comment 1533-1.

Submission 1534 Nicolas M. Garcia

1534-1 The commenter's support for the Elevated/At-Grade Alignment is noted. See MR-1: Selection of Alternatives. Comments related to increasing development density along the project should be directed to the city with jurisdiction over the land use zoning.

Submission 1535 Clifford Yamamoto

1535-1 The commenter's support for the Trench Option is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1536 Kathy Yandell

1536-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1537 Vicki Momary

1537-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1538 Michael Bawolski

1538-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1539 Bob D. Turnbull

1539-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

1539-2 See response to Comment 1539-1.

Submission 1540 Fred Deninger

1540-1 The commenter's support for the Trench Option is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1541 David W. Tressel

1541-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1542 Marsha Kraus

1542-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1543 Cyndi and Michael Runyan

1543-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1544 Jeffery Ly

1544-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1545 Karyn Campbell

1545-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1546 Michael Navarrete

1546-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

1546-2 The environmental impacts of each project option and alternative are analyzed in Chapter 3, Affected Environment and Environmental Impact Analyses, of the Draft EIR. Metro has worked diligently to develop feasible and effective mitigation measures to address the potentially significant impacts of the project.

Submission 1547 Onofre Ramirez

1547-1 The commenter's support for the Trench Option is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1548 John

1548-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1549 Kristina Nakao

1549-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1550 Jean Garcia-Gomez

1550-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1551 Ingrid Aquino-Gomez

1551-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1552 Christopher Olsen

1552-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1553 Eric Loew

1553-1 The commenter's support for the Trench Option. See MR-1: Selection of Alternatives.

Submission 1554 Glenn Murakami

1554-1 The commenter's support for the Trench Option is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1555 Dory Ann Volpe

1555-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1556 Diana

1556-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1557 Jeff Pierce

1557-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1558 Sharon Obatake

1558-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1559 Steve Harmon

1559-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1560 Lilian Harmon

1560-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1561 Jonathan Harmon

1561-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1562 Wendy Ito

1562-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1563 Eric McLeod

1563-1 The commenter's support for the Hawthorne Option is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1564 Yuji Kato

1564-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1565 Eric Hambly

1565-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

1565-2 The commenter's opposition to the project is noted, along with a preference for the Elevated/At-Grade Alignment.

Submission 1566 Alexis Hambly

1566-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

1566-2 The commenter's opposition to the project is noted. All comments have been shared with the Metro Board for their consideration.

Submission 1567 Giselle L. Henry

1567-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1568 Alison & Michael Kasterko

1568-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

1568-2 See response to Comment 1568-1.

Submission 1569 Gary Nakamura

1569-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1570 Robert Munoz

1570-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1571 Hakjoon Song

1571-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1572 Jongmi Kim

1572-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1573 Peter Farb

1573-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

1573-2 The project has been designed to improve overall connectivity, including safe and convenient access to the Torrance Transit Center for pedestrians and cyclists. The project's design has taken accessibility into account, and Metro will continue to assess opportunities for further enhancing connections as the design progresses.

Submission 1574 Rod Royales

1574-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1575 Dena Bialick

1575-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

1575-2 As explained on page 3.1-3 of the Draft EIR, traffic delay (often measured by level of service) is no longer permissible as a CEQA impact criterion and therefore this analysis and related topics are not addressed in the Draft EIR. See MR-11: Traffic Delay and Level-of-Service and the 2023 Transportation Detail Report, published concurrently with the Draft EIR, for a discussion of traffic conditions. Neither the LPA nor the Trench Option would increase vehicle delay compared to existing conditions, as both alignments fully grade separate the light rail from all roadways and do not require modifications to existing intersections or traffic lanes. Regarding access to the Torrance Transit Center, as described in Chapter 2, Project Description, of the Draft EIR, the project would provide a direct connection. Cities with a light rail station are required to make a local contribution to funding through the Measure M 3% Local Match as part of the Los Angeles County Traffic Improvement Plan Ordinance (#16-01).

Submission 1576 C.B.

1576-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

1576-2 The 2023 Ridership Summary Report, published concurrently with the Draft EIR, shows that the project is expected to generate between 11,500 to 15,600 daily transit trips (boardings). See MR-15: Metro Ridership Forecasting Methodology.

Submission 1577 Krishna Kallury

1577-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1578 Rebecca Ward

1578-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

1578-2 Metro recognizes the importance of minimizing impacts from light rail and relocated freight operations. Section 3.6, Noise and Vibration, of the Draft EIR, provides a detailed noise analysis and identifies mitigation measures to reduce significant noise impacts. See MR-3: Operational Noise Project Features and Mitigation Measures.

Submission 1579 Martin Gutierrez

1579-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1580 Brian Gillman

1580-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1581 Jeff Etheringtin

1581-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

1581-2 Metro takes public safety very seriously. See MR-9: Light Rail Security and MR-18: Homelessness.

Submission 1582 Angela Stark

1582-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1583 Steven Birenbaum

1583-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1584 Eileen

1584-1 The commenter's opposition to the project is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1585 Ryan

1585-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

1585-2 See the Executive Summary of the Draft EIR for an overview of the analysis and a description of each option. See MR-19: Project Benefits.

Submission 1586 Mark Kohagura

1586-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1587 Andrea Korntheuer

1587-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1588 Dori

1588-1 The commenter's opposition to the project is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1589 Michael Powe & Barbara Dyer

1589-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

1589-2 Section 3.1, Transportation, of the Draft EIR analyzes the project's transportation impacts. See MR-11: Traffic Delay and Level-of-Service for information addressing traffic concerns. Neither the LPA nor the Trench Option would increase vehicle delay compared to existing conditions, as both alignments fully grade separate the light rail from all roadways and do not require modifications to existing intersections or traffic lanes.

Submission 1590 Kelly L. Dewing Wedel

1590-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

1590-2 The comment reiterates support for the Elevated/At-Grade Alignment due to cost considerations. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1591 Fernando

1591-1 The commenter's support for the Trench Option is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

1591-2 Metro is committed to integrating safety into all Metro rail operations. The project would comply with relevant safety standards, including the California Manual on Uniform Traffic Control Devices, the California Department of Transportation Highway Design Manual, the Americans with Disabilities Act, and Metro's Grade Crossing Safety Policy. The LPA, Trench Option, and Hawthorne Option would be fully grade-separated from all roadways. See MR-8: Light Rail and Freight Train Safety.

Submission 1592 Jafet Rosado De Van

1592-1 The commenter's support for the Trench Option is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1593 Carolina Olaya

1593-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1594 Maria Brown

1594-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1595 Steven Rosales

1595-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1596 Kevin Knapp

1596-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1597 Michele Starkey

1597-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1598 Jackie

1598-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

1598-2 Metro does not have authority to plan for green space within the local jurisdictions. However, as part of the project, Metro would include multi-use paths along the Metro ROW where there is space (between 159th Street and Condon Avenue and between Grant Avenue and 182nd Street, to create recreational space for walking and cycling in the neighborhoods. As explained on page 3.1-3 of the Draft EIR, traffic delay (often measured by level of service) is no longer permissible as a CEQA impact criterion and therefore this analysis and related topics are not addressed in the Draft EIR. See MR-11: Traffic Delay and Level-of-Service and the 2023 Transportation Detail Report, published concurrently with the Draft EIR, for a discussion of traffic conditions. The LPA and Trench Option light rail guideway is fully grade-separated from all roadways, and would not increase vehicle delay compared to existing conditions, nor require modifications to existing traffic lanes.

Submission 1599 Paul

1599-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

1599-2 Metro takes public safety very seriously. See MR-9: Light Rail Security.

Submission 1600 Kathleen Franczak

1600-1 The commenter's support for the Trench Option is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1601 Jenny Lee

1601-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1602 Nitin Dua

1602-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1603 Nolan Miya

1603-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

1603-2 The comment reiterates support for the Elevated/At-Grade Alignment as the economical choice.

Submission 1604 Thomas W. Broyles

1604-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1605 Nes Banta

1605-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1606 Michael Flynn

1606-1 The commenter's support for the Trench Option is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

1606-2 Metro is committed to integrating safety into all Metro rail operations. The project would comply with relevant safety standards, including the California Manual on Uniform Traffic Control Devices, the California Department of Transportation Highway Design Manual, the Americans with Disabilities Act, and Metro's Grade Crossing Safety Policy. The only light rail alignment option studied in the Draft EIR is the Elevated/At-Grade Alignment. The LPA, Trench Option, and Hawthorne Option would fully grade separate the light rail from all roadways. See MR-8: Light Rail and Freight Train Safety.

Submission 1607 Adam Reed

1607-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1608 Brandon Foster

1608-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

1608-2 All light rail alternatives and options, except the Elevated/At-Grade Alignment, would be fully grade-separated, meaning that the light rail would be separated from vehicular and pedestrian crossings. For the at-grade crossings proposed under the Elevated/At-Grade Alignment, the light rail would have signal priority.

Submission 1609 Matthew Lin

1609-1 The commenter's support for the Trench Option is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1610 Steven Deuel

1610-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1611 Kyle Richardson

1611-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

1611-2 See response to comment 1611-1.

1611-3 The comment reiterates support for locating the alignment in the Metro ROW and connecting to the new Redondo Beach Transit. The comment also emphasizes the importance of service frequency and clear wayfinding to support a successful transit system.

1611-4 The Redondo Beach Transit Center Station would be fully Americans with Disabilities Act (ADA) compliant, regardless of alignment. The station would include features such as pedestrian pathways, ramps, and stairs to ensure safe and convenient access for all users.

1611-5 While this project would include measures to address noise impacts specifically associated with the light rail transit line and relocated freight operations, addressing noise from the Interstate 405 Freeway is outside the scope of this project because it is not part of the proposed project. For freight rail noise, the project includes Project Feature PF-NV-1: Quiet Zone Equipment Installation and Mitigation Measure MM-NOI-4: Quiet Zone Establishment to reduce freight noise impacts by eliminating the need for the routine sounding of freight train horns. See MR-3: Operational Noise Project Features and Mitigation Measures.

1611-6 Metro has proposed two multi-use recreational paths, one between 159th Street and 170th Street and another between Grant Avenue and 182nd Street. The multi-use paths follow the route of the Metro ROW, which is straight rather than curved.

1611-7 The LPA, Trench Option, and Hawthorne Option would fully grade separate the light rail from all roadways, meaning, under those alignment options, there would be no conflict between light rail and vehicular traffic at intersections. As a result, raised pedestrian crossings would not be necessary in areas where the light rail crosses for those alignment options. However, pedestrian enhancements would be included at freight crossings for the Metro ROW alignments, and along Hawthorne Boulevard for the Hawthorne Option to improve safety and accessibility. The Elevated/At-Grade Alignment would also include pedestrian enhancements at the two at-grade crossings at 170th and 182nd Streets. Refer to Chapter 2, Description of the Locally Preferred Alternative, of the Final EIR, for more information.

1611-8 As described in Section 3.10, Hydrology and Water Quality, of the Draft EIR, landscaping within the project footprint would meet all relevant regulations, including stormwater retention and infiltration.

1611-9 See MR-13: Soil Stability and Sinkholes and MR-7: Utility Relocation and Hazardous Materials Safety. Pursuant to Project Feature PF-GEO-1: Metro Geotechnical Design Standards, engineering designs, including retaining walls and track support structures, would comply with Metro's safety and engineering standards, and final design would address stability and safety considerations.

Submission 1612 Donald Isozaki

1612-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1613 Jon Robertson

1613-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1614 Garrick McLaughlin

1614-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1615 Ron Carroll

1615-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1616 Al Stahl

1616-1 The commenter's support for the Trench Option is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

1616-2 As explained on page 3.1-3 of the Draft EIR, traffic delay (often measured by level of service) is no longer permissible as a CEQA impact criterion and therefore this analysis and related topics are not addressed in the Draft EIR. See MR-11: Traffic Delay and Level-of-Service and the 2023 Transportation Detail Report, published concurrently with the Draft EIR, for a discussion of traffic conditions. None of the alignment options would increase vehicle miles traveled.

Submission 1617 Mark Kimura

1617-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1618 Lia

1618-1 The commenter's support for the Trench Option is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

1618-2 Metro is committed to integrating safety into all Metro rail operations. The project would comply with relevant safety standards, including the California Manual on Uniform Traffic Control Devices, the California Department of Transportation Highway Design Manual, the Americans with Disabilities Act, and Metro's Grade Crossing Safety Policy. The LPA, Trench Option, and Hawthorne Option would fully grade separate the light rail from all roadways.

Submission 1619 Richard Reinhardt

1619-1 The No Project Alternative was analyzed in the Draft EIR as required by CEQA. As concluded in the Draft EIR, the No Project Alternative would have significant and unavoidable impacts related to transportation, land use and planning, air quality and greenhouse gas emissions, while it would avoid the significant and unavoidable noise and vibration impacts of the project and options. The Metro Board does not have to approve the project and retains the authority to approve the No Project Alternative. This decision will be made after a thorough review of the environmental analysis contained in the Draft and Final EIR and community input.

Current Metro line ridership information can be found at the website: https://opa.metro.net/MetroRidership/. The 2023 Ridership Summary Report, published concurrently with the Draft EIR, shows that the project is expected to generate between 11,500 to 15,600 daily transit trips (boardings). See MR-15: Metro Ridership Forecasting Methodology.

As explained on page 3.1-3 of the Draft EIR, traffic delay (often measured by level of service) is no longer permissible as a CEQA impact criterion and therefore this analysis and related topics are not addressed in the Draft EIR. See MR-11: Traffic Delay and Level-of-Service and the 2023 Transportation Detail Report, published concurrently with the Draft EIR, for a discussion of traffic conditions. Neither the LPA nor the Trench Option would increase vehicle delay compared to existing conditions, as both alignments fully grade separate the

light rail from all roadways and do not require modifications to existing intersections or traffic lanes.

Metro takes public safety very seriously. See MR-9: Light Rail Security.

Submission 1620 George Pimentel

1620-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

1620-2 The Metro Board has selected an LPA for purposes of the Final EIR, although it has not yet approved the project, including any of the options and alternatives evaluated in the Draft EIR. The final decision will be made after the Metro Board reviews the Final EIR, which will include responses to all public comments, including those of the commenter.

Submission 1621 James Hallman

1621-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1622 Annette Porter

1622-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1623 Patrick Porter

1623-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1624 Robert Suyehara

1624-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

1624-2 Metro strives to complete projects on time and within estimated budgets. See MR-21: Cost Estimates and Schedule. Metro has worked diligently to develop feasible and effective mitigation measures to address the potentially significant impacts of the project.

Submission 1625 Norig B. Karakashian

1625-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1626 James Thistle

1626-1 The commenter's support for the Hawthorne Option is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

1626-2 The 2023 Ridership Summary Report, published concurrently with the Draft EIR, shows that the project is expected to generate between 11,500 to 15,600 daily transit trips (boardings). See MR-15: Metro Ridership Forecasting Methodology.

Submission 1627 Sandra Radford

1627-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

1627-2 The commenter's support for the Metro ROW alignment and opposition to the Hawthorne Option is noted. Section 3.6, Noise and Vibration, of the Draft EIR, provides a detailed noise analysis and identifies mitigation measures to reduce significant noise impacts. See MR-3: Operational Noise Project Features and Mitigation Measures. Relative to the Elevated/At-Grade Alignment, the LPA and Trench Option significantly reduce noise impact to residence near the Metro ROW because they eliminate the at-grade crossings at 170th and 182nd Streets. The Hawthorne Option is also fully grade-separated. By grade-separating the light rail from all roadways, the LPA, Trench Option, and Hawthorne Option remove the need for audible warning at light rail crossings, such as routine train horns and crossing bells.

Submission 1628 Madu Chanani

1628-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1629 Katerina Yu

1629-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1630 Adeline Chappell

1630-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1631 Ben Gunter

1631-1 The commenter's support for the Trench Option is noted. See MR-1: Selection of Alternatives. Comments related to Torrance Transit should be directed to the City of Torrance.

Submission 1632 Yacgley Valdes

1632-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1633 Current Resident

1633-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1634 Seema S. Turner

1634-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1635 Amy

1635-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1636 Kimberly Wimmer

1636-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

1636-2 The commenter's secondary support for the Trench Option is noted. All comments have been shared with the Metro Board for their consideration.

Submission 1637 Joel Carlson

1637-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1638 Drew Hettinger

1638-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1639 Marlena Allen

1639-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1640 Lisa DiFranco

1640-1 The commenter's opposition to the project has been noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

As explained on page 3.1-3 of the Draft EIR, traffic delay (often measured by level of service) is no longer permissible as a CEQA impact criterion and therefore this analysis and related topics are not addressed in the Draft EIR. See MR-11: Traffic Delay and Level-of-Service and the 2023 Transportation Detail Report, published concurrently with the Draft EIR, for a discussion of traffic conditions. The potential for traffic disruption from at-grade light rail crossings would not occur under the LPA, Trench Option or Hawthorne Option, as all of these alignment options fully grade separate the light rail from all roadways.

Chapter 3, Section 3.4, Air Quality, of the Draft EIR, analyzes air quality impacts and found no significant impacts during operations. Regarding vehicle idling, the primary pollutant of concern related to idling is carbon monoxide (CO). However, CO concentrations in the South Coast Air Basin have been well below federal and state standards for over two decades and the region has been designated as attainment/maintenance of the CO standards since 2007. Even with potential for localized vehicles idling near stations or drop-off areas, or at grade-crossings under the Elevated/At-Grade Alignment, the project would reduce vehicle miles traveled (VMT), which, in turn reduces total emissions. As a result, any localized idling effects are not anticipated to outweigh the project's broader air quality and mobility benefits.

Submission 1641 J. Imai

1641-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1642 Max Huang

1642-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1643 Andrew Zakim

1643-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1644 David Gutierrez

1644-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1645 Geri Harmon

1645-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

1645-2 Construction traffic would be managed through a Construction Traffic Management Plan (CTMP), required by Project Feature PF-T-1: Construction Traffic Management Plan, described in Section 3.1, Transportation. That said, as explained on page 3.1-3 of the Draft EIR, traffic delay (often measured by level of service) is no longer permissible as a CEQA impact criterion and therefore this analysis and related topics are not addressed in the Draft EIR. See MR-11: Traffic Delay and Level-of-Service and the 2023 Transportation Detail Report, published concurrently with the Draft EIR, for a discussion of traffic conditions. Neither the LPA nor the Trench Option would increase vehicle delay compared to existing conditions, as both alignments fully grade separate the light rail from all roadways and do not require modifications to existing intersections or traffic lanes.

Although, as described in Section 3.6, Noise and Vibration, of the Draft EIR, the project would result in significant and unavoidable noise impacts during construction for all alignment options, construction noise would be managed pursuant to Mitigation Measure MM-NOI-1: Noise Control Plan, which establishes performance standards based on the Federal Transportation Administration's (FTA) 1-hour Leq criteria and requires preparation of a site-specific plan, continuous noise monitoring, and responsive actions to reduce noise to the maximum extent feasible. However, because construction conditions can vary and some activities may temporarily exceed those thresholds, the impact is conservatively considered significant and unavoidable even with mitigation. With respect to long-term operational noise, the Draft EIR finds that only the Elevated/At-Grade Alignment would result in a significant and unavoidable operational noise impact. Operational noise impacts of the Trench Option, Hawthorne Option, and the LPA would be less than significant with mitigation.

Submission 1646 Tanya Sue Cyre

1646-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1647 Sarah Huante-Bimat

1647-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

1647-2 Metro strives to complete projects on time and within estimated budgets. See MR-21: Cost Estimates and Schedule. Metro has worked diligently to develop feasible and effective mitigation measures to address the potentially significant impacts of the project.

Submission 1648 Ed Tobias

1648-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1649 Jan Tobias

1649-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1650 Isabel Torres

1650-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1651 Paul Hutchins

1651-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1652 John Phillip Van Deusen

1652-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

1652-2 Metro is designing the terminus station at the Torrance Transit Center to allow the line to continue further south, should funding become available in the future. Potential extensions from the Torrance Transit Center to San Pedro, Long Beach, and the Los Angeles/Orange County line are included in the unfunded portion of the 2009 Metro Long Range Transportation Plan. Metro may consider these projects in the future, if additional funding becomes available.

Submission 1653 Karne Holley

1653-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1654 Lisa Li

1654-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1655 Lois & Ron Jones

1655-1 The commenter's support for the Elevated/At-Grade Alignment is noted. See MR-1: Selection of Alternatives. The project would provide benefits to Torrance. The project would connect to the new regional bus transit center in Torrance. See MR-17: Response to Torrance Community Letter and MR-19: Project Benefits. The project has secured funding from Measure R (2008), Measure M (2016), TIRCP Grant from the California State Transportation Agency Transit and Intercity Rail Capital Program, and 3% match contributions from local jurisdictions. Metro is committed to the responsible use of public funds and to managing project costs efficiently, while continuing to pursue additional funding sources to support project delivery. See MR-21: Cost Estimates and Schedule.

Submission 1656 Phil Hong

1656-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1657 Randy Garrett

1657-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1658 Maya Yanez

1658-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1659 Judith Gerber

1659-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1660 Michael and Nancy Bergan

1660-1 The commenter's support for the Trench Option is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1661 Richard Leroy Lujan

1661-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1662 Stephanie Seki

1662-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1663 Andrew Maxwell

1663-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

1663-2 The comment reiterates support for the Elevated/At-Grade Alignment despite noise impacts due to schedule and cost. Metro has worked diligently to develop feasible and effective mitigation measures to address the potentially significant impacts of the project, including noise.

Submission 1664 Leah Glavan

1664-1 The commenter's support for the Hawthorne Option is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives. Similar to the Hawthorne Option, the LPA and Trench Option would fully grade separate the light rail from all roadways, thereby avoiding potential conflicts with pedestrians.

Submission 1665 Jawad Jilani

1665-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1666 Nancy Gutierrez

1666-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1667 Pirza Castro

1667-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1668 Chirstos Sbarounis

1668-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

1668-2 The proposed stations are located at the Redondo Beach Transit Center or South Bay Galleria and Torrance Transit Center. The proposed stations were selected based on ridership potential, ability to provide seamless and efficient service, physical fit, and community impacts. Metro does not have plans to add another station at this time.

Submission 1669 Jonathan Turcios

1669-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1670 Sumit Kalra

1670-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1671 Deborah Wearn

1671-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

1671-2 The comment reiterates support for the Elevated/At-Grade Alignment due to avoiding delays and incremental funding.

Submission 1672 Mitch Koch

1672-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1673 Steven Dillow

1673-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives. The commenter also notes that the Elevated/At-Grade Alignment is the most cost-effective method. See MR-21: Cost Estimates and Schedule.

Submission 1674 DarLynn Nemitz

1674-1 The commenter's support for the Trench Option is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

1674-2 Regarding earthquake safety, as described in Section 3.8, Geology, Soils and Paleontological Resources, of the Draft EIR, in accordance with Project Feature PF-GEO-1: Metro Geotechnical Design Standards, all elements of the project would be designed and constructed in compliance with Metro's geotechnical and seismic design criteria to ensure seismic resistance and stability. In addition, the Metro Rail Design Criteria and associated Metro seismic stability and safety guidelines provide specific requirements to prevent structural failure and protect public safety during seismic events.

Submission 1675 Jay Kim

1675-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

1675-2 The comment reiterates support for the Elevated/At-Grade Alignment.

Submission 1676 Erik Aguillon

1676-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1677 Scott Fukuda

1677-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1678 Connie Noehren

1678-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1679 Libra Washington

1679-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1680 Lily Lau

1680-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1681 Ana Sorto

1681-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

1681-2 Metro is committed to engaging communities as part of the project development process to inform design and decision-making. Metro collected public comments as part of the Draft EIR public comment process and shared summaries of public input with the Metro Board. Before making a final determination on the project, the Metro Board will review the comments and responses included in the Final EIR and will consider multiple factors, including environmental impacts, benefits, and costs.

Submission 1682 Badrinath Ramamoorthy

1682-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1683 Yi Chen Pao

1683-1 The commenter's support for the Hawthorne Option is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

1683-2 The commenter correctly notes that the Elevated/At-Grade Alignment includes grade crossings. The LPA and Trench Option light rail guideway is fully grade-separated from all roadways, and would not increase vehicle delay compared to existing conditions.

Submission 1684 Estela Lopez

1684-1 The commenter's preference for enhanced regional bus service is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives. A High-Frequency Bus Alternative on local arterials is discussed in Chapter 4, Evaluation of Alternatives, of the Draft EIR. Metro takes public safety very seriously. See MR-9: Light Rail Security.

Submission 1685 Alissa Pappadake

1685-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

1685-2 See response to Comment 1685-1.

Submission 1686 Jeff Hovsepian

1686-1 The commenter's support for the Elevated/At-Grade Alignment, Hawthorne Option, and Trench Option is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1687 Emanuel Rodriguez

1687-1 The commenter's support for the Hawthorne Option is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

1687-2 All light rail options and alternatives evaluated in the Draft EIR have two proposed stations: one in Redondo Beach and one in Torrance adjacent to the Torrance Transit Center. Alignments that use the Metro ROW stop at the Redondo Beach Transit Center, adjacent to and west of the South Bay Galleria. The alignment that uses the Hawthorne Option stops on Hawthorne in front of and east of the South Bay Galleria.

Submission 1688 Kathy Miya

1688-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1689 Ben Nye

1689-1 The commenter's support for the Hawthorne Option is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

1689-2 The commenter's opposition to the Trench Option is noted. All comments have been shared with the Metro Board for their consideration.

Submission 1690 Layne Sakamoto

1690-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1691 Jose Dennis Alabaso

1691-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives and MR-21: Cost Estimates and Schedule.

Submission 1692 Molly

1692-1 The commenter's opposition to the light rail in Torrance is noted. All comments have been shared with the Metro Board for their consideration. Metro takes public safety very seriously. See MR-9: Light Rail Security and MR-18: Homelessness.

Submission 1693 Matthew J. Davis

1693-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

1693-2 Metro takes public safety very seriously. See MR-9: Light Rail Security.

Submission 1694 Jon Robertson

1694-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

1694-2 The commenter's support for public transit in Torrance is noted. All comments have been shared with the Metro Board for their consideration.

Submission 1695 Michelle

1695-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

1695-2 The commenter's opposition to the project is noted. All comments have been shared with the Metro Board for their consideration. Metro takes public safety very seriously. See MR-9: Light Rail Security.

Submission 1696 Esther

1696-1 The commenter's support for the Trench Option is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1697 Patrick Llorens

1697-1 The commenter's support for the Hawthorne Option is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1698 James Kotekci

1698-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1699 Mary Kotekci

1699-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1700 Karen Blanchard

1700-1 The commenter's support for the Metro ROW alignment, Hawthorne Option, and Trench Option is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1701 Miguel A. Perez

1701-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

1701-2 See response to Comment 1701-1.

Submission 1702 Michael Guzman

1702-1 The commenter's support for the Hawthorne Option is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1703 Fred Mosley

1703-1 The commenter's opposition to the project is noted. The 2023 Ridership Summary Report, published concurrently with the Draft EIR, shows that the project is expected to generate between 11,500 to 15,600 daily transit trips (boardings). See MR-15: Metro Ridership Forecasting Methodology and MR-19: Project Benefits. Metro takes public safety very seriously. See MR-9: Light Rail Security.

Submission 1704 Richard Rodriguez

1704-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

1704-2 Metro strives to complete projects on time and within estimated budgets. See MR-21: Cost Estimates and Schedule. The intent of the project is to provide an alternative to driving which would reduce the likelihood of future increases in traffic. See MR-11: Traffic Delay and Level-of-Service and the 2023 Transportation Detail Report, published concurrently with the Draft EIR, for a discussion of traffic conditions. The Draft EIR focuses on physical environmental impacts and measures to mitigate them, as required by CEQA. However, Metro's goal is to help businesses continue to operate throughout construction and post-construction.

Submission 1705 Maria Gordon

1705-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

1705-2 The project would provide an alternative to driving which would reduce the likelihood of future increases in traffic. See MR-11: Traffic Delay and Level-of-Service and the 2023 Transportation Detail Report, published concurrently with the Draft EIR, for discussion on traffic conditions. The 2023 Ridership Summary Report, published concurrently with the Draft EIR, shows that the project is expected to generate between 11,500 to 15,600 daily transit trips (boardings). See MR-15: Metro Ridership Forecasting Methodology and MR-19: Project Benefits. Metro takes public safety very seriously. See MR-9: Light Rail Security.

Submission 1706 Constance Reynolds

1706-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1707 Joseph Yamashiro

1707-1 The commenter's support for the Trench Option is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

1707-2 Like the Trench Option, the LPA fully grade separates the light rail from all roadways, as does the Hawthorne Option. See response to Comment 1707-1 and MR-11: Traffic Delay and Level-of-Service.

Submission 1708 Lisa Scherer

1708-1 The commenter's support for the Trench Option is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1709 Carlos Delgado

1709-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

1709-2 Metro takes public safety very seriously. See MR-9: Light Rail Security.

Submission 1710 Ryan Shiroma

1710-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1711 Tony & Karen Herrada

1711-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

1711-2 The 2023 Ridership Summary Report, published concurrently with the Draft EIR, shows that the project is expected to generate between 11,500 to 15,600 daily transit trips (boardings). See MR-15: Metro Ridership Forecasting Methodology and MR-19: Project Benefits. A High-Frequency Bus Alternative on local arterials is evaluated in Chapter 4, Evaluation of Alternatives, of the Draft EIR. Metro takes public safety very seriously. See MR-9: Light Rail Security. See MR-15: Metro Ridership Forecasting Methodology for more information regarding ridership trends.

Submission 1712 Katie Pandolfo

1712-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1713 Graham DesErmia

1713-1 The commenter's support for the Trench Option is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1714 Trang Le

1714-1 The commenter's support for the Trench Option is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1715 Gianna Valenzuela

1715-1 The commenter's support for the Hawthorne Option is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

1715-2 The commenter's opinion that the additional cost of the Hawthorne Option is worth the ability to keep streets available for cars is noted. All comments have been shared with the Metro Board for their consideration.

Submission 1716 Carol Erickson

1716-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

1716-2 The commenter's primary support for the Elevated/At-Grade Alignment and secondary support for the Hawthorne Option is noted. Metro strives to complete projects on time and within estimated budgets. See MR-21: Cost Estimates and Schedule.

Submission 1717 Brad Aniya

1717-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

1717-2 The commenter's support for light rail is noted. All light rail options and alternatives analyzed in the Draft EIR provide a direct connection to the LAX/Metro Transit Center. When the project opens, it would operate as part of the K Line, traveling north-south between the Expo/Crenshaw Station and the proposed station at Torrance. It would connect to the LAX/Metro Transit Station, providing service to LAX. The C (Green) Line currently travels east/west between the LAX/Metro Transit Station and the Norwalk Station. Metro takes public safety very seriously. See MR-9: Light Rail Security.

Submission 1718 Yukihisa Aokusa

1718-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1719 Lisa Barry

1719-1 The commenter's support for the Trench Option is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1720 Eileen Jaynes

1720-1 The commenter's support for the Elevated/At-Grade Alignment and the Trench Option is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1721 Deborah Pasienski

1721-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1722 Harry Yee

1722-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1723 Mamatha Amrutham

1723-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1724 Jennifer Bullivant

1724-1 The commenter's opposition to the project is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1725 Edwin Rosas

1725-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1726 Maria Alarcon

1726-1 The commenter's support for the Elevated/At-Grade Alignment is noted. See MR-1: Selection of Alternatives. Metro strives to complete projects on time and within estimated budgets. See MR-21: Cost Estimates and Schedule. Metro has worked diligently to develop feasible and effective mitigation measures to address the potentially significant impacts of the project.

Submission 1727 GN

1727-1 The commenter's support for the Trench Option is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1728 James Baker

1728-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1729 Heng Baker

1729-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1730 Brad Shimbukuro

1730-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1731 Melanie Drieke

1731-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

1731-2 The commenter's support for the Metro ROW alignment is noted. See MR-1: Selection of Alternatives for more information regarding how the LPA would avoid impacts to the Breakwater Village senior living community. Metro strives to complete projects on time and within estimated budgets. See MR-21: Cost Estimates and Schedule. The commenter's support for the lowest cost and impact to businesses and residents is noted. Metro strives to complete projects on time and within estimated budgets. See MR-21: Cost Estimates and Schedule. Metro has worked diligently to develop feasible and effective mitigation measures to address the potentially significant impacts of the project.

Submission 1732 Jackie Eckland

1732-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

1732-2 Metro worked diligently to develop feasible and effective mitigation measures to address the potentially significant impacts of the project. See MR-10: Changes to Community Character.

Submission 1733 West Torrance Homeowners Association

1733-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

1733-2 This comment is noted. All comments have been shared with the Metro Board for their consideration. See response to Comment 1733-1.

Submission 1734 Fink Family

1734-1 The commenter's support for Hawthorne Option is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

1734-2 See response to Comment 1734-1.

Submission 1735 Cori Talbot

1735-1 The commenter's support for the Hawthorne Option is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

1735-2 The commenter's concern for residents along the Metro ROW is noted. Metro has worked diligently to develop feasible and effective mitigation measures to address the potentially significant impacts of the project. See MR-10: Changes to Community Character.

Submission 1736 C. Henderson

1736-1 The commenter's support for the Hawthorne Option is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

1736-2 No additional bike path improvements are proposed for the Hawthorne Option. The Metro ROW alignment includes two multi-use paths along where there is space (between 159th Street and Condon Avenue, between Grant Avenue and 182nd Street, and adjacent to the Torrance Transit Center), to create recreational space for walking and cycling in the neighborhoods.

Submission 1737 Gari Tani

1737-1 The commenter's support for the Hawthorne Option is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1738 Margaret Heflinger

1738-1 The commenter's support for the Hawthorne Option is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

1738-2 Elevated structures are used where grade separations are required. There are elevated tracks for both the Hawthorne Option as well as parts of the Metro ROW alignments.

Submission 1739 Michael A. Serufine

1739-1 The commenter's support for the Hawthorne Option is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

1739-2 See response to Comment 1739-1.

Submission 1740 Donald Heflinger

1740-1 The commenter's support for the Hawthorne Option is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

1740-2 Elevated structures are used where grade separations are required. There are elevated tracks for both the Hawthorne Option as well as parts of the Metro ROW alignments.

Submission 1741 Dennis LoPiccolo

1741-1 The commenter's support for the Hawthorne Option is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

1741-2 Metro takes public safety very seriously. See MR-9: Light Rail Security and MR-18: Homelessness.

Submission 1742 Florence Tebbets

1742-1 The commenter's support for the Hawthorne Option is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1743 Eric Homier

1743-1 The commenter's support for the Hawthorne Option is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

1743-2 Metro understands concerns regarding property values. However, under CEQA, economic impacts such as changes in property values are not considered environmental impacts. The Draft EIR focuses on physical environmental impacts and measures to mitigate them, as

required by CEQA. To address questions and concerns on property values, Metro has prepared more information. See MR-14: Property Values and Impacts to Businesses. Also see MR-10: Changes in Community Character.

Submission 1744 Bruce Lagarte

1744-1 The commenter's support for the Hawthorne Option is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1745 Irene Griffith

1745-1 The commenter's support for the Hawthorn Option is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

1745-2 Metro strives to complete projects on time and within estimated budgets. See MR-21: Cost Estimates and Schedule. Metro has worked diligently to develop feasible and effective mitigation measures to address the potentially significant impacts of the project.

Submission 1746 Emily Durbin

1746-1 The commenter's support for the Hawthorne Option is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

1746-2 Metro is committed to integrating safety into all Metro rail operations. The project would comply with relevant safety standards, including the California Manual on Uniform Traffic Control Devices, the California Department of Transportation Highway Design Manual, the Americans with Disabilities Act, and Metro's Grade Crossing Safety Policy. The LPA, Trench Option, and Hawthorne Option would fully grade separate the light rail from all roadways, thereby avoiding potential conflicts between the light rail and pedestrians and cyclists. See MR-8: Light Rail and Freight Train Safety.

Submission 1747 Carol Booser

1747-1 The commenter's support for the Hawthorne Option is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1748 Gary Maclean

1748-1 The commenter's support for the Hawthorne Option is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

1748-2 The commenter's support for the project is noted. All comments have been shared with the Metro Board for their consideration.

Submission 1749 Pam Combar

1749-1 The commenter's support for the Hawthorne Option is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

1749-2 Section 3.8, Geology and Soils, of the Draft EIR acknowledges alluvial soils in the project resource study area. As detailed in Section 3.8-4.6 of the Draft EIR, which evaluates the potential for the project to be located on a geologic unit or soil that is unstable or that would become unstable as a result of the project, the project would result in a less than significant impact. The project includes Project Feature PF-GEO-1: Metro Geotechnical Design Standards, which requires preparation of a site-specific geotechnical investigation. See MR-13: Soil Stability and Sinkholes.

1749-3 The potential for noise impacts for the Elevated/At-Grade Alignment, the Trench option, and the Hawthorne Option are addressed in Section 3.6, Noise and Vibration, of the Draft EIR. The potential for LPA impacts is addressed Chapter 4, Evaluation of Alternatives, of the Draft EIR. See MR-2: Operational Noise Analysis Methodology and Impact Thresholds; MR-3: Operational Noise Project Features and Mitigation Measures; and MR-4: Potential Negative Health Effects Related to Noise, Vibration, and Air Quality.

Submission 1750 Harumi Nishikan

1750-1 The commenter's support for the Hawthorne Option is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1751 Douglass Coreas

1751-1 The commenter's support for the Trench Option and Hawthorne Option is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1752 Tom O'Neill

1752-1 The commenter's support for the Trench Option and Hawthorne Option is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

1752-2 The 2023 Ridership Summary Report, published concurrently with the Draft EIR, shows that the project is expected to generate between 11,500 to 15,600 daily transit trips (boardings). See MR-15: Metro Ridership Forecasting Methodology. Metro understands concerns regarding property values. However, under CEQA, economic impacts such as changes in property values are not considered environmental impacts. The Draft EIR focuses on physical environmental impacts and measures to mitigate them, as required by CEQA. To address questions and concerns on property values, Metro has prepared more information. See MR-14: Property Values and Impacts to Businesses. Also see MR-10: Changes in Community Character.

Submission 1753 Janet Sue

1753-1 The commenter's support for the Trench Option is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1754 Patricia Carlini

1754-1 The commenter's support for the Trench Option is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1755 The Browns

1755-1 The commenter's support for the Trench Option is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1756 Franco and Kim Reitz

1756-1 The commenter's support for the Trench Option is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1757 Geoffrey M. Hefler

1757-1 The commenter's support for the Trench Option is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

1757-2 Chapter 4, Evaluation of Alternatives, of the Draft EIR, and Chapter 2, Description of the Locally Preferred Alternative, of the Final EIR further describe the impacts of the LPA, which, for operational noise and aesthetic impacts, would be similar to the Trench Option. The LPA and Trench Option significantly reduce operational noise impacts to residential land uses along the Metro ROW compared to the Elevated/At-Grade Alignment because they eliminate the at-grade crossings at 170th and 182nd Streets. The Hawthorne Option also fully grade separates the light rail. By grade-separating the light rail from all roadways, the LPA, Trench Option, and Hawthorne Option remove the need for audible warning at light rail crossings, such as routine light rail train horns and crossing bells.

Submission 1758 Ophelia Biomort

1758-1 The commenter's support for the Trench Option is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1759 Frank Kraus

1759-1 The commenter's preference for the Trench Option is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

1759-2 The commenter's opposition to the project is noted. All comments have been shared with the Metro Board for their consideration.

Submission 1760 Jerry Morrison

1760-1 The commenter's support for the Trench Option is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1761 Seok Jeong Lim

1761-1 The commenter's support for the Trench Option is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1762 Juno & Ethel Uyematsu

1762-1 The commenter's support for the Trench Option is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

1762-2 The commenter's opinion that the Trench Option is aesthetically better is noted. All comments have been shared with the Metro Board for their consideration.

1762-3 The commenter's opinion that the Trench Option would generate less noise is noted. All comments have been shared with the Metro Board for their consideration.

Submission 1763 Louis V. Martel

1763-1 The commenter's support for the Elevated/At-Grade Alignment and the Trench Option is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1764 Alan Sarkisian

1764-1 The commenter's preference for the Trench Option is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

1764-2 The commenter's opposition to the project is noted. No alignment has been approved at this time. The Metro Board selected the LPA for purposes of the Final EIR. Before making a final determination on the project, the Metro Board will review the comments and responses included in the Final EIR and will consider multiple factors, including environmental impacts, benefits and costs. A bus would cost less than rail but would offer significantly reduced benefits. As described in the 2023 Ridership Summary Report, published concurrently with the Draft EIR, the light rail extension would serve 11,500 and 15,600 daily project trips in 2042 compared to the High-Frequency Bus Alternative, which attracts 3,700 to 4,000 daily project trips. Buses would need to travel within already congested streets, and would not have the same capacity to support anticipated growth in the South Bay. See MR-19: Project Benefits.

Submission 1765 Dana LaRoche

1765-1 The commenter's support for the Trench Option and Hawthorne Option is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1766 William Nichols

1766-1 The commenter's support for the Trench Option is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

1766-2 The commenter's support for the trench option due to noise reduction is noted. Similar to the Trench Option, the LPA significantly reduces noise impacts compared to the Elevated/At-Grade Alignment because it eliminates the at-grade crossings at 170th and 182nd Streets. Unlike the Elevated/At-Grade Alignment, the under the LPA, Trench Option and Hawthorne Option would grade separate the light rail from all roadways, thereby eliminating the need for audible warning at light rail crossings, such as routine light rail train horns and crossing bells. Metro strives to complete projects on time and within estimated budgets. See MR-21: Cost Estimates and Schedule.

Submission 1767 Steven Sack

1767-1 The commenter's support for the Trench Option is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1768 Eric Orchard

1768-1 The commenter's support for the Trench Option is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

1768-2 See Section 3.3, Aesthetics, and Section 3.6, Noise and Vibration, of the Draft EIR, along with MR-3: Operational Noise Project Features and Mitigation Measures and MR-10: Changes to Community Character.

Submission 1769 Lisa Loewner

1769-1 The commenter's support for the Trench Option is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1770 Merry Passage

1770-1 The commenter's support for the Trench Option is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

1770-2 The commenter's opposition for the Trench Option is noted despite the prior comment indicating support. As described in Chapter 2, Project Description, of the Draft EIR, the entire light rail guideway would be enclosed with some kind of barrier, such as fencing or a soundwall in areas where noise mitigation is proposed. Metro takes public safety very seriously. See MR-8: Light Rail and Freight Train Safety.

Submission 1771 Chuck Salisbury

1771-1 The commenter's support for the Elevated/At-Grade Alignment and the Trench Option is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

1771-2 As described in Chapter 2, Project Description, of the Draft EIR, the entire light rail guideway would be enclosed in a physical barrier, such as fencing, soundwalls, or a combination of both, thereby preventing unauthorized intrusion. Metro takes public safety very seriously. See MR-8: Light Rail and Freight Train Safety.

Submission 1772 David Burrows

1772-1 The commenter's support for the Elevated/At-Grade Alignment and Hawthorne Option is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

1772-2 The commenter's opposition to the Trench Option is noted. It is unclear what the commenter means about the Hawthorne Option connecting to the Redondo Green line; the Hawthorne Option would start at the Redondo Beach (Marine) Station, and would have a stop at Artesia Boulevard, where riders could walk to the Redondo Beach Transit Center or connect there via transit.

Submission 1773 K. Nelson

1773-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1774 Joe & Mary

1774-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1775 Camillia Lee

1775-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1776 B. O'Brien

1776-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

1776-2 The commenter's support for the Torrance City Council's approved route is noted. All comments have been shared with the Metro Board for their consideration.

Submission 1777 Lisa Pedion

1777-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

1777-2 The Hawthorne Boulevard Median Project beautified medians located on Hawthorne Boulevard between Del Amo Boulevard and Torrance Boulevard. The Hawthorne Option would avoid this area and south of 190th Street would run adjacent to the existing freight tracks.

Submission 1778 Kathy

1778-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1779 James Cook

1779-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1780 Nancy Fengler

1780-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1781 H. & J. Taga

1781-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

1781-2 The project has secured funding from Measure R (2008), Measure M (2016), TIRCP Grant from the California State Transportation Agency Transit and Intercity Rail Capital Program, and 3% match contributions from local jurisdictions. Metro is committed to the responsible use of public funds and to managing project costs efficiently, while continuing to pursue additional funding sources to support project delivery. See MR-21: Cost Estimates and Schedule. The environmental impacts of each project option and alternative are analyzed in Chapter 3, Affected Environment and Environmental Impact Analyses, of the Draft EIR. Metro has worked diligently to develop feasible and effective mitigation measures to address the potentially significant impacts of the project.

Submission 1782 Susan Ludwig

1782-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

1782-2 The commenter's support for the Metro ROW alignment as the most cost effective and least impactful to traffic and parking is noted.

Submission 1783 Anonymous

1783-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1784 Geoff Guerrero

1784-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1785 Christine Brenk

1785-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1786 Michael Brenk

1786-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1787 Madison Brenk

1787-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1788 Diana L. Seyb

1788-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1789 Michael Brenk

1789-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1790 Jane Readeur

1790-1 The commenter's opposition to the project is noted. All comments have been shared with the Metro Board for their consideration. Metro takes public safety very seriously. See MR-9: Light Rail Security and MR-18: Homelessness.

The project's potential relationship to increased density is discussed in Section 3.16, Other CEQA Considerations, of the Draft EIR. The project would improve and facilitate opportunities for growth around transit while helping to reduce reliance on personal automobiles in the region. Senate Bill (SB) 9 and SB 10 are state housing laws that facilitate the development of additional housing units on certain parcels, but their applicability is not determined or driven by the presence of light rail transit. Instead, these laws are part of broader efforts to address California's housing shortage. While the project would support

growth management goals of the affected jurisdictions, and help to reduce potential environmental impacts associated with such foreseeable growth, the project would not cause unplanned or excessive growth. Rather, the project would be consistent with local and regional planning efforts, such as those of the Southern California Association of Governments, to manage growth. These efforts prioritize transit-oriented development to create walkable communities near transit hubs, consistent with local growth management goals. Therefore, no adverse effects associated with growth-inducement are anticipated. See MR-19: Project Benefits.

Submission 1791 Thomas Penland

1791-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

1791-1 The commenter's opposition to light rail in Torrance and secondary support for the Metro ROW alignment is noted. All comments have been shared with the Metro Board for their consideration.

Submission 1792 Timothy Cunningham

1792-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1793 Ted Potcovaru

1793-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1794 Eric Caro

1794-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

1794-2 This commenter's opposition to the Hawthorne Option is noted. The comment also notes support for the Elevated/At-Grade Alignment due to cost and noise considerations. Metro is committed to the responsible use of public funds and to managing project costs efficiently, while continuing to pursue additional funding sources to support project delivery. See MR-21: Cost Estimates and Schedule. See Section 3.6, Noise and Vibration, of the Draft EIR, for a thorough analysis of potential noise impacts, as well as mitigation measures to reduce the noise impacts. As explained on page 3.1-3 of the Draft EIR, traffic delay (often measured by level of service) is no longer permissible as a CEQA impact criterion and therefore this analysis and related topics are not addressed in the Draft EIR. See MR-11: Traffic Delay and Level-of-Service and the 2023 Transportation Detail Report, published concurrently with the Draft EIR, for a discussion of traffic conditions. Neither the LPA nor the Trench Option would

increase vehicle delay compared to existing conditions, as both alignments fully grade separate the light rail from all roadways and do not require modifications to existing intersections or traffic lanes. Metro takes public safety very seriously. See MR-9: Light Rail Security.

Submission 1795 Allen Perlstein and James Goodrich

1795-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

1795-2 See response to Comment 1795-1.

Submission 1796 William Champlin

1796-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1797 Victoria Fox

1797-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1798 James Vaughan

1798-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1799 Henry Martinez

1799-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

1799-2 The commenter's concerns regarding delays and cost increases are noted. Metro strives to complete projects on time and within estimated budgets. See MR-21: Cost Estimates and Schedule.

Submission 1800 Mike Madrigal

1800-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

1800-2 Presently, the Metro C Line links with the Metro J Line at the Harbor Freeway Station, two stations north of Harbor Gateway Transit Center. Operating as part of the Metro K Line,

riders could connect to the Metro C Line at Aviation/Century, to then connect to the Metro J Line and access the Harbor Gateway Transit Center. Torrance Transit, which provides bus service within this project's study area, also connects to the Harbor Gateway Transit Center.

Submission 1801 David Sanders

1801-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

1801-2 The Redondo Beach and Torrance Transit Centers both provide existing parking spaces that could be used for transit customers. Metro will coordinate with the cities on transit parking based on demand. The project would include infrastructure and design features that facilitate access for varying modes of transportation. Metro will continue to engage with the community to identify opportunities for improving station access and connectivity. It does not provide term parking for LAX.

Submission 1802 Margaret Kline

1802-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1803 Sue Walters

1803-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1804 Kelly Wu

1804-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1805 Eva Wuertz

1805-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1806 Kurt Michel

1806-1 The commenter's support for the Hawthorne Option is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1807 Jose Dennis Alabaso

1807-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

1807-2 The Metro K Line Aviation/Century Station opened in Fall 2024.

Submission 1808 Lisa Whitfield

1808-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

1808-2 As explained on page 3.1-3 of the Draft EIR, traffic delay (often measured by level of service) is no longer permissible as a CEQA impact criterion and therefore this analysis and related topics are not addressed in the Draft EIR. See MR-11: Traffic Delay and Level-of-Service and the 2023 Transportation Detail Report, published concurrently with the Draft EIR, for a discussion of traffic conditions. The LPA and Trench Option are fully grade-separated from all roadways, and would not increase vehicle delay compared to existing conditions, nor would they require modifications to existing traffic lanes.

Submission 1809 Sandra Schreyer

1809-1 The commenter's support for the Trench Option is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1810 Han Wen Tsao

1810-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1811 Dan Criotoru

1811-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1812 Tana Rice

1812-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

1812-2 The environmental impacts of each project option and alternative are analyzed in Chapter 3, Affected Environment and Environmental Impact Analyses, of the Draft EIR. Metro has worked diligently to develop feasible and effective mitigation measures to address the potentially significant impacts of the project. As part of the project development process in

preparing the alignment routes, Metro emphasized minimizing acquisitions and effects to residents and businesses. The alignment options would have minimal real estate impacts to businesses, as described in the 2025 Real Estate Acquisitions Report.

Submission 1813 Grace Weltman

1813-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

1813-2 Potential air quality impacts are addressed in Section 3.4, Air Quality, of the Draft EIR, including dust control during construction. Compliance with Project Features PF-AQ-1: Tier 4 Engine Standards and PF-AQ-2: Dust Control Best Practices would ensure that construction activities comply with South Coast Air Quality Management District and Metro standards controlling emissions and dust. Operationally, the light rail vehicles would be powered by electricity and would not produce localized emissions. Regional air quality would improve with implementation of the project due to a shift from passenger vehicles to light rail in the corridor. As explained on page 3.1-3 of the Draft EIR, traffic delay (often measured by level of service) is no longer permissible as a CEQA impact criterion and therefore this analysis and related topics are not addressed in the Draft EIR. See MR-11: Traffic Delay and Level-of-Service and the 2023 Transportation Detail Report, published concurrently with the Draft EIR, for a discussion of traffic conditions. See Section 3.6, Noise and Vibration, of the Draft EIR, for a thorough analysis of potential noise impacts, as well as mitigation measures to reduce the noise impacts. For the Metro ROW alignments, the project would enable local cities to establish Quiet Zones with Federal Railroad Administration (FRA), as part of Project Feature PF-NV-1: Quiet Zone Equipment Installation and Mitigation Measure MM-NOI-4: Quiet Zone Establishment. See MR-3: Operational Noise Project Features and Mitigation Measures.

Submission 1814 Nancy Wilcox

1814-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

1814-2 See response to Comment 1814-1. Metro takes public safety very seriously. See MR-9: Light Rail Security. Regarding earthquake safety, as described in Section 3.8, Geology, Soils and Paleontological Resources, of the Draft EIR, in accordance with Project Feature PF-GEO-1: Metro Geotechnical Design Standards, all elements of the project would be designed and constructed in compliance with Metro's geotechnical and seismic design criteria to ensure seismic resistance and stability. In addition, the Metro Rail Design Criteria and associated Metro seismic stability and safety guidelines provide specific requirements to prevent structural failure and protect public safety during seismic events. Routine maintenance has been factored into the cost assumptions for the project. See MR-21: Cost Estimates and Schedule.

Submission 1815 Milton Aineruhanga

1815-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1816 Marco

1816-1 The commenter's opposition to a rail system and support for buses or bus lanes is noted. See MR-1: Selection of Alternatives. A High-Frequency Bus Alternative on local arterials is evaluated in Chapter 4, Evaluation of Alternatives, of the Draft EIR. Metro takes public safety very seriously. Metro is committed to the responsible use of public funds and to managing project costs efficiently, while continuing to pursue additional funding sources to support project delivery. See MR-21: Cost Estimates and Schedule. Metro has worked diligently to develop feasible and effective mitigation measures to address the potentially significant impacts of the project, including those related to construction. Metro is committed to integrating safety into all Metro rail operations. The project would comply with relevant safety standards, including the California Manual on Uniform Traffic Control Devices, the California Department of Transportation Highway Design Manual, the Americans with Disabilities Act, and Metro's Grade Crossing Safety Policy. See MR-8: Light Rail and Freight Train Safety.

Submission 1817 Stefan Eckland

1817-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

1817-2 The commenter's support for the Metro ROW alignment due to cost considerations is noted. Metro takes public safety very seriously. See MR-9: Light Rail Security.

Submission 1818 David Dewitt

1818-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1819 Masaru Iwanaga

1819-1 The commenter's support for the Hawthorne Option is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

1819-2 The project would provide benefits to Torrance. The project would connect to the new regional bus transit center in Torrance. See MR-17: Response to Torrance Community Letter and MR-19: Project Benefits.

Submission 1820 Susan Eriksen

1820-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1821 Leslie Chavez

1821-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1822 Sandra Yoshioka

1822-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1823 Patty Zaremski

1823-1 The commenter's support for the Hawthorne Option is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1824 Cristian Guerrero

1824-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1825 Kent Oliver

1825-1 The commenter's support for the Metro ROW alignment, Trench Option, and Hawthorne Option is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

1825-2 The commenter's preference for grade-separated transit is noted. All comments have been shared with the Metro Board for their consideration. The LPA, Trench Option, and Hawthorne Option would fully grade separate the light rail from all roadways.

Submission 1826 Brad M.

1826-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1827 Wolfgang Fengler

1827-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1828 Bexsi Fujiwara

1828-1 The commenter's support for the Trench Option and Hawthorne Option is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1829 Linda & David Ortega

1829-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1830 Karl D. Albert

1830-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

1830-2 See response to Comment 1830-1.

Submission 1831 Adrianne Luther

1831-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

1831-2 The commenter's support for the project is noted. TAP machines are a requirement for all Metro Rail stations.

Submission 1832 Brenden Baltimore

1832-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1833 Mr. James T. Wright

1833-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

1833-2 The commenter's support for the Elevated/At-Grade Alignment but preference for no light rail is noted. All comments have been shared with the Metro Board for their consideration.

Submission 1834 Christopher J. Pon

1834-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1835 Anonymous

1835-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1836 Robin Solomon

1836-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

1836-2 This commenter's support for the Hawthorne Option is noted. All comments have been shared with the Metro Board for their consideration. Metro strives to complete projects on time and within estimated budgets. See MR-21: Cost Estimates and Schedule.

Submission 1837 Mr. Richard Smisek

1837-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1838 N. Maloney

1838-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

1838-2 The Metro ROW alignments would directly connect to the new Redondo Beach Transit Center.

Submission 1839 Luis Garcia

1839-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1840 Irene Brucks

1840-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

1840-2 This commenter's preference for cost savings is noted. The project has secured funding from Measure R (2008), Measure M (2016), TIRCP Grant from the California State Transportation Agency Transit and Intercity Rail Capital Program, and 3% match contributions from local jurisdictions. Metro is committed to the responsible use of public funds and to managing project costs efficiently, while continuing to pursue additional funding sources to support project delivery. See MR-21: Cost Estimates and Schedule.

Submission 1841 Marianne Moscynski

1841-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1842 Jane K. Hashimoto

1842-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

1842-2 The commenter's support for the project is noted.

Submission 1843 George Williams

1843-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1844 Bill Sorosky

1844-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1845 Joseph Palsulich

1845-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1846 Sung J. Hong

1846-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1847 Linda Zelk

1847-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1848 Kathy H. Ujiye

1848-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1849 Anonymous

1849-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1850 Anonymous

1850-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1851 Keith

1851-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1852 Mr. & Mrs. William B. Campbell

1852-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1853 Jaclynn Miller Madoni

1853-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

1853-2 The commenter's support for the Torrance City Council's approved route is noted. All comments have been shared with the Metro Board for their consideration.

Submission 1854 Jennifer Silver

1854-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1855 Judy & Bob June

1855-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1856 Carol Campbell

1856-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

1856-2 Routine maintenance has been factored into the cost assumptions for the project. See MR-21: Cost Estimates and Schedule.

Submission 1857 Mary Hileman

1857-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

1857-2 The commenter's support for the Elevated/At-Grade Alignment due to cost and disruption concerns is noted.

Submission 1858 Patrick Westfahl

1858-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1859 Zalatan Sehovic

1859-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1860 Nancy Brock

1860-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

1860-2 This commenter's support for the project is noted.

Submission 1861 Maureen Wilson

1861-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

1861-2 Metro takes public safety very seriously. See MR-9: Light Rail Security and MR-18: Homelessness.

Submission 1862 Mrs. Dana Chambers

1862-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1863 Keiko Kono

1863-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1864 Genie Valdez

1864-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

1864-2 As described in Section 3.8, Geology and Soils, of the Draft EIR, the project would be designed to accommodate high seismic ground motion and associated consequences in accordance with Metro's geotechnical design standards and thresholds, Project Feature PF-GEO-1: Metro Geotechnical Design Standards. Site-specific geotechnical investigations would be performed in accordance with the Metro Rail Design Criteria (MRDC) Section 5.6 to incorporate seismic demands and provide engineering solutions. The project would comply with the latest versions of local and state building codes and regulations.

Submission 1865 Randy Degasperin

1865-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1866 Kristen Papac

1866-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1867 Celia Caampued

1867-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1868 Gary E. Kaloostian

1868-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1869 Harry Bellows III

1869-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

1869-2 The commenter's support for the Elevated/At-Grade Alignment due to cost and constructability concerns is noted.

Submission 1870 Michael Goguen

1870-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1871 Maurine Swilley

1871-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1872 Harold Jason

1872-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1873 Samuel Gnerre

1873-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1874 Anonymous

1874-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1875 Carol Halfabe

1875-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1876 John Warren

1876-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1877 David Oster

1877-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1878 Bill & Fran Arrowsmith

1878-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

1878-2 The commenter's support for the Torrance City Council's approved route is noted.

Submission 1879 Linda Jung

1879-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1880 Beverly A. Borton

1880-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1881 Danelle Berch

1881-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1882 Fazlo Edber

1882-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

1882-2 This commenter's preference for cost savings is noted. The project has secured funding from Measure R (2008), Measure M (2016), TIRCP Grant from the California State Transportation Agency Transit and Intercity Rail Capital Program, and 3% match contributions from local jurisdictions. Metro is committed to the responsible use of public funds and to managing project costs efficiently, while continuing to pursue additional funding sources to support project delivery. See MR-21: Cost Estimates and Schedule.

Submission 1883 Randy & JoanAnn Hart

1883-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1884 Kerry Croucer

1884-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1885 Sam Marteland

1885-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1886 Joann and Mike Tripp

1886-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

1886-2 See MR-18: Homelessness, for details on how Metro is addressing concerns related to homeless populations.

Submission 1887 Gail Serrano Vasquez

1887-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1888 Mr. Gary McKenzie

1888-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1889 Chris Tam

1889-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1890 Arelen Dubas

1890-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1891 Kit Chan

1891-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1892 Tomi Kawaski

1892-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

1892-2 Metro is committed to integrating safety into all Metro rail operations. The project would comply with relevant safety standards, including the Americans with Disabilities Act and Metro's Grade Crossing Safety Policy. The LPA, Trench Option, and Hawthorne Option would fully grade separate the light rail from all roadways, thereby avoiding potential conflicts between light rail and pedestrians. In addition, for the Metro ROW alignments, the freight crossing at 182nd Street would include new safety equipment. The Hawthorne Option would also include pedestrian enhancements, as discussed in Chapter 2, Project Description, of the Draft EIR.

Submission 1893 Leonard Zak

1893-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1894 Denny Hallmark

1894-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

1894-2 The commenter's support for the Elevated/At-Grade Alignment due to cost, constructability, and traffic concerns is noted.

Submission 1895 Peter Gregoris

1895-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1896 Michele Urbina

1896-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1897 Shoreh Zareh

1897-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1898 Ann Clark

1898-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1899 Heather Albright

1899-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

1899-2 The Draft EIR includes quantitative analyses by subject matter experts on the effects of the project on air quality. With respect to actions that would be taken to reduce air pollution during construction, the project's contractor would comply with all applicable air quality control measures adopted by the South Coast Air Quality Management District (SCAQMD) and Metro. These measures include requiring all construction equipment to meet or exceed Tier 4 emission standards, which represent the cleanest available technology for off-road equipment, as outlined in Project Features PF-AQ-1: Metro Green Construction Policy Compliance and PF-AQ-2: SCAQMD Rule 403 Compliance in the Draft EIR. Additionally, best management practices for controlling fugitive dust emissions, such as regular watering of exposed surfaces, covering of stockpiles, and limiting vehicle speeds on unpaved surfaces,

would be enforced. Relative to non-compliance, these practices are expected to reduce dust emissions by up to 91%, as detailed in Section 3.4, Air Quality, of the Draft EIR. The Draft EIR determined that although construction activities would result in temporary emissions, these emissions would not exceed regional or localized thresholds established by SCAQMD for each light rail alignment option considered, other than the Trench Option. As discussed in Chapter 3 of the Final EIR, the LPA would have less than significant construction air quality impacts.

For operations, the project is expected to improve regional air quality by reducing vehicle miles traveled and encouraging a shift from car travel to clean, electric-powered light rail transit. This would result in a net decrease in air pollutants and greenhouse gas (GHG) emissions over the long term. See Section 3.4, Air Quality, of the Draft EIR, for a detailed analysis of both construction and operational air quality impacts.

1899-3 Metro has worked diligently to develop feasible and effective mitigation measures to address the potentially significant impacts of the project. See MR-10: Changes to Community Character. The project has secured funding from Measure R (2008), Measure M (2016), a Transit and Intercity Rail Capital Project (TIRCP) Grant from the California State Transportation Agency Transit and 3% match contributions from local jurisdictions. Metro is committed to the responsible use of public funds and to managing project costs efficiently, while continuing to pursue additional funding sources to support project delivery. See MR-21: Cost Estimates and Schedule.

Submission 1900 X

1900-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1901 Hanif Haji

1901-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

1901-2 This comment is noted. See response to Comment 1901-1.

Submission 1902 Oluynika Sorunke

1902-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1903 John Usui

1903-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1904 Robert Jung

1904-1 The commenter's support for the Hawthorne Option is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1905 Brandon Folkman

1905-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1906 Samantha Folkman

1906-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1907 Ralph

1907-1 The 2023 Ridership Summary Report, published concurrently with the Draft EIR, shows that the project is expected to generate between 11,500 to 15,600 daily transit trips (boardings). See MR-15: Metro Ridership Forecasting Methodology. As explained on page 3.1-3 of the Draft EIR, traffic delay (often measured by level of service) is no longer permissible as a CEQA impact criterion and therefore this analysis and related topics are not addressed in the Draft EIR. See MR-11: Traffic Delay and Level-of-Service and the 2023 Transportation Detail Report, published concurrently with the Draft EIR, for a discussion of traffic conditions. The LPA and Trench Option are fully grade-separated from all roadways, and would not increase vehicle delay compared to existing conditions, nor require modifications to traffic lanes.

1907-2 The project has secured funding from Measure R (2008), Measure M (2016), TIRCP Grant from the California State Transportation Agency Transit and Intercity Rail Capital Program, and 3% match contributions from local jurisdictions. Metro is committed to the responsible use of public funds and to managing project costs efficiently, while continuing to pursue additional funding sources to support project delivery. See MR-21: Cost Estimates and Schedule.

1907-3 The commenter's opposition to the project is noted. See MR-1: Selection of Alternatives. It is important to note that while the Elevated/At-Grade Alignment has been selected as the LPA, the Metro Board has not yet approved the project, including any of the options and alternatives evaluated in the Draft EIR. The final decision will be made after the Metro Board reviews the Final EIR, which will include responses to all public comments.

Submission 1908 Christine Tokunaga

1908-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

1908-2 The commenter's opposition to providing a station in Torrance is noted. All comments have been shared with the Metro Board for their consideration.

Submission 1909 Cynthia Kringen

1909-1 The commenter's opposition to light rail in the South Bay is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1910 Isaac Ng

1910-1 The commenter's support for the Hawthorne Option is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

1910-2 The commenter's support for the Hawthrone Option and opposition to the Elevated/At-Grade Alignment and Trench Option is noted. The project includes two stations for all three options studied in the Draft EIR: one in Redondo Beach and one at the Torrance Transit Center.

Submission 1911 Mahesh Tyagi

1911-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1912 Rajani Patel

1912-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1913 Vinh Cam

1913-1 The commenter's support for the Metro ROW alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

1913-2 Metro strives to complete projects on time and within estimated budgets. See MR-21: Cost Estimates and Schedule. Metro has worked diligently to develop feasible and effective mitigation measures to address the potentially significant impacts of the project.

Submission 1914 Lori Bowker

1914-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1915 Daniel Bowker

1915-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1916 Ellen Tran

1916-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1917 Cynthia A. Lim

1917-1 The commenter's support for the Trench Option is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1918 Sam

1918-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1919 Rachel LaCoe

1919-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1920 Melissa Brymer

1920-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

1920-2 See response to Comment 1920-1.

Submission 1921 Potato Jim

1921-1 The commenter's support for the Elevated/At-Grade Alignment and Trench Option is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

1921-2 The project would provide an alternative to driving which would reduce the likelihood of future increases in traffic. See MR-11: Traffic Delay and Level-of-Service and the 2023 Transportation Detail Report, published concurrently with the Draft EIR, for discussion on traffic conditions.

Submission 1922 Frank Putz

1922-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1923 B. Stacy

1923-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

1923-2 This comment's support for the Elevated/At-Grade Alignment due to cost considerations is noted.

Submission 1924 Rebecca Poirier

1924-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1925 Marian Eskander

1925-1 The commenter's support for the Trench Option is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

1925-2 The commenter's opposition to light rail in Torrance is noted. The Draft EIR considers and analyzes a No Project Alternative, which was presented to the Metro Board along with all other options prior to the Board's selection of the LPA. It is important to note that while the Metro Board has selected an LPA for purposes of the Final EIR, it has not yet approved the project, including any of the options and alternatives evaluated in the Draft EIR. The final decision will be made after the Metro Board reviews the Final EIR, which will include responses to all public comments, including those of the commenter.

Submission 1926 Linda Holliday

1926-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

1926-2 Metro takes public safety very seriously. See MR-9: Light Rail Security and MR-18: Homelessness.

Submission 1927 Cheng-Wen Huang

1927-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1928 Jenifer Roberts

1928-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

1928-2 No light rail stations are proposed within predominantly residential areas. Soundwalls would be implemented to reduce noise associated with the light rail transit line as required by Mitigation Measure MM-NOI-2: Soundwalls. See MR-3: Operational Noise Project Features and Mitigation Measures for information regarding noise project features and mitigation measures.

Submission 1929 Lauren Faith Niro

1929-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1930 Linda Hurnbeck

1930-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1931 John Carter

1931-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1932 Frank Yanai

1932-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1933 James C. Reidy

1933-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1934 Lilia Lucero

1934-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

1934-2 The commenter's preference for using the existing tracks on the Redondo side is noted.

Submission 1935 Sally Matsumoto

1935-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1936 Gus Mesch

1936-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

1936-2 The commenter's support for the project is noted.

Submission 1937 Thomas & Cheryl Lenahan

1937-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1938 Douglas Lowder

1938-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1939 Dorcas Huang

1939-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1940 Richard Astin

1940-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. Metro takes public safety very seriously. See MR-9: Light Rail Security and MR-1: Selection of Alternatives.

Submission 1941 R. Parke

1941-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1942 Mr. Kenneth F. Darr

1942-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1943 Bryan Griebenow

1943-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1944 Bruce Pettingale

1944-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1945 Patrick Healy

1945-1 Metro has designed the project to avoid displacement of residents. See the 2025 Real Estate Acquisition Report for more detailed information on proposed property acquisitions. In some areas along the Metro ROW, property owners have built out past their property lines and encroached into Metro ROW.

1945-2 This commenter's support for the Metro ROW alignment and secondary support for the Hawthorne Option is noted. See MR-1: Selection of Alternatives. A gondola has not been studied as the transit mode for the project as it would not meet the objectives of the project, in particular related to providing a direct connection to the existing regional transit network. See Section 4.2, Alternatives Considered and Rejected, of the Draft EIR, for a discussion of alternative studied by Metro starting in 2009.

1945-3 Metro has prioritized designing the project to fit within the existing Metro ROW to reduce disruption to nearby homes and businesses and reduce property acquisition needs. Redevelopment is not proposed by the project.

Submission 1946 Mark Nelson

1946-1 The project under consideration is a light rail transit line to be operated by Metro, not a heavy rail line operated by Metrolink or freight rail. Light rail vehicles are quieter, electrically powered trains that generate less noise compared to larger, diesel operated Metrolink trains and freight operators. See MR-4: Potential Negative Health Effects Related to Noise, Vibration, and Air Quality.

1946-2 Metro understands concerns regarding property values. However, under CEQA, economic impacts such as changes in property values are not considered environmental impacts. The Draft EIR focuses on physical environmental impacts and measures to mitigate them, as required by CEQA. To address questions and concerns on property values, Metro has prepared more information. See MR-14: Property Values and Impacts to Businesses. Metro, as the CEQA Lead Agency, has the responsibility to determine the appropriate criteria for the project. The Metro ROW is owned by Metro and is not regulated by the City of Redondo Beach. The Redondo Beach Municipal Code does not apply to the Metro ROW and state law preempts Metro from local zoning requirements.

1946-3 See response to Comments 1946-1 and 1946-2.

Submission 1947 Holly Osborne

1947-1 Metro prepared cost estimates in 2022 for all rail alignments and shared them with the Metro Board prior to the May 23, 2024, Board meeting. The cost estimate for the LPA at the time was $2.23B. Metro is continuing to refine the cost estimate as design progresses, and will provide an update to the Metro Board when the Final EIR is completed; see MR-21: Cost Estimates and Schedule. While the LPA is more costly than the Elevated/At-Grade Alignment, it remains over half a billion dollars less expensive than the Trench or Hawthorne Options.

1947-2 The 2023 Ridership Summary Report, published concurrently with the Draft EIR, shows that the project is expected to generate between 11,500 to 15,600 daily transit trips (boardings). See MR-15: Metro Ridership Forecasting Methodology.

1947-3 See response to Comment 1947-2.

The commenter refers to presentation materials that were shared at the Draft EIR public hearings. The materials summarized the range of ridership projections for all alignment options. The May 2024 Board Report, available to the public prior to the Metro Board meeting and reviewed by the Metro Board prior to selecting an LPA, included detailed ridership information for all alignment options and alternatives.

Submission 1948 Jennifer L. Dodge

1948-1 All light rail and freight tracks are designed according to Metro's design criteria with appropriate clearances, and would fit within the existing Metro ROW. See Appendix 2-A, Select ACE Drawings, of the Draft EIR and Appendix B, Select Advanced Conceptual Engineering Drawings - Locally Preferred Alternative, of the Final EIR for more details on the relocated freight and light rail tracks. See also MR-8: Light Rail and Freight Train Safety.

1948-2 Potential impacts related to soil conditions are evaluated in Section 3.8, Geology and Soils, of the Draft EIR. See MR-7: Utility Relocation and Hazardous Materials Safety for utility relocation details in the Metro ROW, as well as information concerning construction and operational vibration effects on underground utilities. See MR-13: Soil Stability and Sinkholes for a detailed discussion of how construction and operation within the corridor would be managed in consideration of local soil conditions. Potential noise impacts, along with noise mitigation measures, are described in Section 3.6, Noise and Vibration, of the Draft EIR. See also MR-4: Potential Negative Health Effects Related to Noise, Vibration, and Air Quality.

1948-3 The project under consideration is a light rail transit line to be operated by Metro, not a heavy rail line operated by Metrolink or freight rail. Light rail vehicles are quieter, electrically powered trains that generate less noise compared to larger, diesel operated Metrolink trains and freight operators. As described in Section 2, Project Description, of the Draft EIR, existing freight tracks would need to be shifted to accommodate light rail tracks; the distances vary depending on the location. Mitigation Measure MM-VIB-3: Pre- and Post-Construction Surveys requires contractors to document damage resulting from vibration

impacts during construction, and repair them. In addition, as discussed in Section 3.8, Geology and Soils, of the Draft EIR, the project design process would include thorough site geotechnical investigations to ensure the stability of nearby structures. Per Project Feature PF-GEO-1: Metro Geotechnical Design Standards, site-specific geotechnical investigations would be conducted to address foundation and structural safety. The investigation would include engineering and constructions recommendations to ensure surrounding structures are not damaged.

1948-4 The commenter's support for the Hawthorne Option is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1949 Ray Hollar

1949-1 Submission 346 includes the same comment from the same commentor. See response to Comment 346-1.

Submission 1950 Ray Hollar

1950-1 The potential loss of on-street parking is part of the Hawthorne Option, thus was included in the description of this option. The 2023 Transportation Detail Report, published concurrently with the Draft EIR, includes an inventory of on-street parking spaces and the number of parking spaces along this segment of the Hawthorne Option. However, this loss of parking spaces in the context of a public transit project in an urban environment is not considered an environmental impact under CEQA that needs to be mitigated.

With regards to inclusion of Areas of Controversy, see the response to Comment 364-1.

1950-2 In the context of a public transit project in an urban environment, parking impacts are not considered an environmental impact that requires mitigation under CEQA. The potential loss of on-street parking is mentioned as an element of the Hawthorne Option's description, not an impact. It is also described in the 2023 Transportation Detail Report, published concurrently with the Draft EIR.

With regards to inclusion of Areas of Controversy, see the response to Comment 364-1.

Submission 1951 Margie Alexander

1951-1 Regarding changes in community character, health impacts, and property values, see MR-10: Changes to Community Character, MR-4: Potential Negative Health Effects Related to Noise, Vibration, and Air Quality and MR-14: Property Values and Impacts to Businesses, respectively. It should also be noted that the LPA would avoid shifting the freight tracks closer to the Breakwater Village Senior Complex. For additional information, see MR-1: Selection of Alternatives.

1951-2 The project under consideration is a light rail transit line to be operated by Metro, not a heavy rail line operated by Metrolink or freight rail. Light rail vehicles are quieter, electrically powered trains that generate less noise compared to larger, diesel operated Metrolink trains and freight operators. As described in Section 2, Project Description, of the Draft EIR, existing freight tracks would need to be shifted to accommodate light rail tracks; the

distances vary depending on the location. Mitigation Measure MM-VIB-3: Pre- and Post-Construction Surveys requires contractors to document damage resulting from vibration impacts during construction and repair them. In addition, as discussed in Section 3.8, Geology and Soils, of the Draft EIR, the project design process would include thorough site geotechnical investigations to ensure the stability of nearby structures. Per Project Feature PF-GEO-1: Metro Geotechnical Design Standards, site-specific geotechnical investigations would be conducted to address foundation and structural safety. The investigation would include engineering and constructions recommendations to ensure surrounding structures are not damaged.

The presence of natural gas lines and petroleum pipelines, their potential impacts, and applicable regulatory requirements are addressed in Sections 3.9, Hazards and Hazardous Materials, and 3.11 Utilities and Service System, of the Draft EIR. Potential impacts of the LPA in this context are evaluated in Chapter 4, Evaluation of Alternatives, of the Draft EIR. In addition, Section 4.13, Corrections and Additions, of the Final EIR expands on the analysis in Section 3.9-4.2.1 of the Draft EIR by clarifying the protocols, construction techniques, regulations, and standards with which the project would comply. As detailed therein, the revisions do not change the Draft EIR's conclusion that the impact related to oil and gas pipelines would be less than significant.

See MR-7: Utility Relocation and Hazardous Materials Safety, MR-8: Light Rail and Freight Train Safety; and MR-13: Soil Stability and Sinkholes.

1951-3 Metro has worked diligently to develop feasible and effective mitigation measures to address the potentially significant environmental impacts of the project. See MR-10: Changes to Community Character; MR-4: Potential Negative Health Effects Related to Noise, Vibration, and Air Quality; MR-7: Utility Relocation and Hazardous Materials Safety; and MR-14: Property Values and Impacts to Businesses.

It should also be noted that the LPA would avoid shifting the freight tracks closer to the Breakwater Village Senior Complex.

1951-4 Metro takes public safety very seriously. See MR-9: Light Rail Security and MR-18: Homelessness.

1951-5 The commenter's opposition to the Metro ROW alignment is noted. All comments have been shared with the Metro Board for their consideration.

Submission 1952 Janice Tanabe

1952-1 Passengers at the Redondo Beach TC Station would exit the station toward the city's transit center, where they could connect with other modes of transit. A multi-use recreational path would be located between Grant Avenue and 182nd Street along the east side of the Metro ROW, which would provide access to the station.

There is sufficient room to construct and operate a trench under 182nd Street to allow the light rail to travel below the street. With respect to the embankment near Breakwater Village, a new retaining wall would be constructed to accommodate the grade changes and ensure safe operation of the light rail and freight. See MR-13: Soil Stability and Sinkholes.

All light rail and freight tracks are designed according to Metro's design criteria with appropriate clearances, and would fit within the existing Metro ROW. See Appendix 2-A, Select ACE Drawings, of the Draft EIR and Appendix B, Select Advanced Conceptual Engineering Drawings -Locally Preferred Alternative, of the Final EIR for more details on the relocated freight and light rail tracks. See MR-8: Light Rail and Freight Train Safety.

Submission 1953 Monique Negrete-Mitchell

1953-1 The commenter's opposition to the Metro ROW alignment is noted. The presence of natural gas lines and petroleum pipelines, their potential impacts, and applicable regulatory requirements are addressed in Sections 3.9, Hazards and Hazardous Materials, and 3.11, Utilities and Service System, of the Draft EIR. Potential impacts of the LPA in this context are evaluated in Chapter 4, Evaluation of Alternatives, of the Draft EIR. In addition, Section 4.13, Corrections and Additions, of the Final EIR expands on the analysis in Section 3.9-4.2.1 of the Draft EIR by clarifying the protocols, construction techniques, regulations, and standards with which the project would comply. As detailed therein, the revisions do not change the Draft EIR's conclusion that the impact related to oil and gas pipelines would be less than significant. See MR-7: Utility Relocation and Hazardous Materials Safety and MR-13: Soil Stability and Sinkholes.

1953-2 This regulation applies to the project and is referenced in Section 3.9, Hazards and Hazardous Materials, of the Draft EIR. As outlined in Project Feature PF-HHM-1: Handling, Storage, and Transport of Hazardous Materials and Wastes, handling, storage, and transport of any identified hazardous materials and waste would comply with applicable federal and state regulations.

In Section 4.13, Corrections and Additions, of this Final EIR, the following text pertaining to the Hazardous Materials Transportation Act's regulations has been added to Project Feature PF-HHM-1: Handling, Storage, and Transport of Hazardous Materials and Wastes for clarity: "The transportation of hazardous materials and waste shall be conducted in accordance with the applicable regulations codified in 49 Code of Federal Regulations (CFR) Parts 101, 106, 107, and 171 to 180, including, but not limited to, those related to packagings, pre-transportation functions, transportation functions, and functions not subject to the requirements of the federal Hazardous Materials Regulations." This addition does not change the meaning or conclusions of the Draft EIR. The impact is still less than significant.

Submission 1954 Giana Mitchell

1954-1 Urbanized avian species, including resident birds of prey such as red-tailed hawks, great-horned owls, and barn owls (as noted in the article provided), are protected under the Migratory Birds Treaty Act and the California Fish and Game Code (CFGC). As discussed in Section 3.7, Biological Resources, of the Draft EIR, species protected under the Migratory Bird Treaty Act (MBTA) and California Fish and Game Code (CFGC) have potential to occur within the SA. This includes resident birds of prey, such as red-tailed hawks and great-horned owls. As stated on page 3.7-22 of the Draft EIR, portions of the Resource Study Area (RSA) provide urbanized avian species with both suitable breeding and foraging habitat in the form of trees, vegetation, and man-made structures. The Draft EIR acknowledges that construction activities could temporarily disturb these habitats. To address this, Mitigation

Measure MM-BIO-2: Nesting Bird Season Restrictions and Pre-Construction Surveys establishes protections for nesting birds, including seasonal restrictions and pre-construction surveys to identify active nests. Given the existing anthropogenic disturbance (e.g., vehicular traffic, train traffic, human presence) throughout the RSA, these measures are anticipated to mitigate potential impacts on local avian species to less than significant. The project does not propose any permanent changes that would preclude birds from returning to the area after construction is completed.

Submission 1955 Jan Kurth

1955-1 The commenter's opposition to the project in Torrance is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

1955-2 Metro takes public safety very seriously. See MR-9: Light Rail Security and MR-18: Homelessness.

1955-3 The 2023 Ridership Summary Report, published concurrently with the Draft EIR, shows that the project is expected to generate between 11,500 to 15,600 daily transit trips (boardings). See MR-15: Metro Ridership Forecasting Methodology

1955-4 See response to Comment 1955-2.

1955-5 The commenter's support for the Hawthorne Option is noted. All comments have been shared with the Metro Board for their consideration.

1955-6 See MR-8: Light Rail and Freight Train Safety.

Submission 1956 Marie Puterbaugh

1956-1 Metro takes public safety very seriously. See MR-9: Light Rail Security.

Submission 1957 Maria Savage

1957-1 The commenter's support for the Hawthorne Option is noted. All comments have been shared with the Metro Board for their consideration.

Metro recognizes the concerns of residents near the Metro ROW, including those on 182nd Place and Firmona Avenue. The Draft EIR evaluates all alignment options, including the Hawthorne Option, which is referenced in the comment. For additional information related to the issues raised in this comment, see Section 3.1, Transportation, Section 3.3, Aesthetics, Section 3.4, Air Quality, Section 3.6, Noise and Vibration, and Chapter 4, Evaluation of Alternatives, of the Draft EIR.

Compared to the Elevated/At-Grade Alignment, the LPA significantly reduces operational noise impacts because, like the Trench Option, it eliminates the at-grade crossings at 170th and 182nd Streets. By grade-separating the light rail from all roadways, the LPA, as well as the Trench and Hawthorne Options, removes the need for audible warning at light rail crossings, such as routine light rail train horns and crossing bells. As described in Chapter 4,

Evaluation of Alternatives, of the Draft EIR and Chapter 2, Description of the Locally Preferred Alternative, of the Final EIR, operational noise impacts of the LPA would be reduced to less than significant levels with mitigation at all sensitive receptors. As further described in Chapter 4, Evaluation of Alternatives, of the Draft EIR, and Chapter 2, Description of the Locally Preferred Alternative, of the Final EIR, the impacts of the LPA would be comparable to those of the Trench Option.

Metro has worked diligently to develop feasible and effective mitigation measures to address the potentially significant impacts of the project, including noise and vibration. See MR-3: Operational Noise Project Features and Mitigation Measures; MR-6: Vibration Analysis During Final Design; and MR-10: Changes to Community Character.

See MR-21: Cost Estimates and Schedule for details on the construction schedule for the project.

Submission 1959 Mike

1959-1 The commenter does not provide specific information on which properties are of concern, but there are two gas stations along Inglewood Avenue that would be affected by the project. One property on the north side of Inglewood Avenue would be affected by the Hawthorne Option, and would be fully acquired for construction and operations. The other gas station on the south side of Inglewood Avenue would be affected by the Metro ROW alignments, including the LPA, with a small portion of the property identified as being needed for grade crossing infrastructure, as well as for a temporary construction easement. See the 2025 Real Estate Acquisitions Report for more information.

The project email included in the comment is correct, and Metro checks it frequently and on a regular basis for comments, including for comments on the Draft EIR.

Should property acquisition be required, Metro would comply with all applicable laws and regulations, including the California Relocation Act (Gov. Code subsection 7260 et seq.) and Metro's internal policies. Metro would provide relocation assistance and compensation to eligible displaced property and business owners, in accordance with these regulations. Just compensation would be based on the fair market value established by an approved appraisal, and all affected property owners would be notified in advance and informed of their rights and eligibility for assistance and benefits

Submission 1960 Ray Hollar

1960-1 As stated on page 3.3-54 of the Draft EIR, there are no designated scenic vistas in the resource study area (RSA). Views of the mountains and other landmarks the commenter mentioned are located relatively long distances from the Metro ROW in Lawndale, which makes any possible views of them quite distant. For example, the Hollywood Sign is located approximately 17 miles north/northeast of the Metro ROW in Lawndale. Nonetheless, those distant views would remain available from public streets and sidewalks, even with the addition of project elements such as soundwalls and elevated structure.

Project Feature PF-AES-2: Metro Design Standards further commits the project to implementing Metro's design policies, which ensure high-quality landscaping and visual appeal. Section 3.3-4.3.2 of the Draft EIR provides details concerning landscaping, as relevant, in the text and corresponding visual simulations. The project's unified design elements and landscaping would contribute positive visual enhancements, such as uniform landscaped public spaces. In addition, as relevant to the City of Lawndale, the 2023 Urban Design Report, published concurrently with the Draft EIR, provides that the project design would focus on preserving the open space character along Condon Avenue by retaining mature trees, where feasible, and introducing additional shade trees to enhance the corridor's visual character. CEQA does not mandate a detailed landscape and maintenance plan at the EIR stage. Such details would be determined during final design.

1960-2 The commenter's opposition to the Metro ROW alignment is noted. See MR-1: Selection of Alternatives. Metro has worked diligently to develop feasible and effective mitigation measures to address the potentially significant impacts of the project. See MR-10: Changes to Community Character.

Submission 1961 Kylee Kirby-Smith

1961-1 The commenter's opposition to the project is noted. See MR-1: Selection of Alternatives Metro has worked diligently to develop feasible and effective mitigation measures to address the potentially significant impacts of the project. See MR-10: Changes to Community Character.

1961-2 Although some residents use the Metro ROW for recreational activities, this use is not authorized or compliant with freight safety standards. See response to Comment 1961-1.

1961-3 The commenter's support for the Hawthorne Option and opposition to the Metro ROW alignment is noted. All comments have been shared with the Metro Board for their consideration.

Submission 1962 Janice Tanabe

1962-1 Urbanized avian species, including resident birds of prey such as red-tailed hawks and great-horned owls, are protected under the Migratory Birds Treaty Act and the California Fish and Game Code (CFGC). As discussed in Section 3.7, Biological Resources, of the Draft EIR, species protected under the Migratory Bird Treaty Act (MBTA) and California Fish and Game Code (CFGC) have potential to occur within the Resource Study Area (RSA). This includes resident birds of prey, such as red-tailed hawks and great-horned owls. As stated on page 3.7-22 of the Draft EIR, portions of the RSA, such as El Nido Park, provide urbanized avian species with both suitable breeding and foraging habitat in the form of trees, vegetation, and man-made structures. The Draft EIR acknowledges that construction activities could temporarily disturb these habitats. To address this, Mitigation Measure MM-BIO-2: Nesting Bird Season Restrictions and Pre-Construction Surveys establishes protections for nesting birds, including seasonal restrictions and pre-construction surveys to identify active nests. Given the existing anthropogenic disturbance (e.g., vehicular traffic, train traffic, human presence) throughout the RSA, these measures are anticipated to mitigate potential impacts on local avian species to less than significant. The project does not propose any permanent

changes that would preclude birds from returning to the area after construction is completed. Further, El Nido Park is a landscaped area consisting of ornamental vegetation and located adjacent to the existing Metro ROW where disturbance from ongoing freight activity and anthropogenic use occurs daily; terrestrial wildlife species utilizing the park are adapted to living in an urban environment; therefore operational impacts would be less than significant. See MR-10: Changes in Community Character.

Submission 1963 Colleen Villegas

1963-1 The potential for noise and vibration impacts for the Elevated/At-Grade Alignment, the Trench option, and the Hawthorne Option are addressed in Section 3.6, Noise and Vibration, of the Draft EIR. The potential for LPA impacts is addressed Chapter 4, Evaluation of Alternatives, of the Draft EIR. The analysis concludes that, with mitigation, vibration levels from light rail and relocated freight operations would be well below thresholds that could cause structural damage to buildings. Mitigation Measure MM-VIB-3: Pre- and Post-Construction Surveys requires contractors to document damage resulting from vibration impacts during construction and repair them. In addition, as discussed in Section 3.8, Geology and Soils, of the Draft EIR, the project design process would include thorough site geotechnical investigations to ensure the stability of nearby structures. Per Project Feature PF-GEO-1: Metro Geotechnical Design Standards, site-specific geotechnical investigations would be conducted to address foundation and structural safety. The investigation would include engineering and constructions recommendations to ensure surrounding structures are not damaged.

The Draft EIR identifies potential construction noise and construction vibration impacts as significant and unavoidable. However, Metro's contractor would implement Mitigation Measures MM-NOI-1: Noise Control Plan and MM-VIB-1: Vibration Control Plan to reduce these impacts to the extent feasible. The vibration control plan would include monitoring vibration levels to ensure compliance with the damage and annoyance thresholds to the maximum extent feasible. Additionally, construction-related activities would proceed in phases, limiting the duration of any impacts at a given location.

The commenter provides a link to a National Geographic Encyclopedia Entry, which discusses the global issue of noise pollution, particularly its high-intensity effects on human health, wildlife, and marine life. In contrast, the noise generated by the project would be intermittent, localized, and mitigated through soundwalls, quiet zones, and low-impact technologies. See MR-4: Potential Negative Health Effects Related to Noise, Vibration, and Air Quality.

1963-2 Metro has extensive experience overseeing the design and construction of light rail projects and has successfully managed utility relocations for similar transit projects throughout the region. Potential soil stability impacts are addressed in Section 3.8, Geology and Soils, of the Draft EIR. See MR-13: Soil Stability and Sinkholes. As described in Section 3.8, Geology, Soils, and Paleontological Resources, of the Draft EIR, pursuant to Project Feature PF-GEO-1: Metro Geotechnical Design Standards, engineering designs, including retaining walls and track support structures, would comply with Metro's safety and engineering standards, and final design would address stability and safety considerations.

1963-3 Metro has worked diligently to develop feasible and effective mitigation measures to address the potentially significant impacts of the project. See MR-4: Potential Negative Health Effects Related to Noise, Vibration, and Air Quality and MR-10: Changes to Community Character. Section 3.7, Biological Resources, of the Draft EIR, discusses implementation of mitigation measures that include general protection measures to avoid and minimize impacts on sensitive biological resources and nesting bird season restrictions, and pre-construction surveys. See response to Comments 1963-1 and 1963-2.

1963-4 The commenter's support for the Hawthorne Option is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1964 Armando Vicente

1964-1 The commenter's opposition to the project using the Metro ROW is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

1964-2 Noise and vibration are addressed in Section 3.6, Noise and Vibration of the Draft EIR. Chapter 4, Evaluation of Alternatives, of the Draft EIR evaluates these impacts with respect to the LPA. Metro has worked diligently to develop feasible and effective mitigation measures to address the potentially significant impacts of the project, including noise and vibration. See MR-2: Operational Noise Analysis Methodology and Impact Thresholds; MR-3: Operational Noise Project Features and Mitigation Measures; and MR-4: Potential Negative Health Effects Related to Noise, Vibration, and Air Quality; MR-5: Vibration Impact Types and Impact Thresholds; and MR-6: Vibration Analysis During Final Design.

As discussed in Section 3.2, Land Use, of the Final EIR, the Elevated/At-Grade Alignment would not physically divide the community because residents would still be able to cross the Metro ROW at all existing designated rail crossings located at Inglewood Avenue, Manhattan Beach Boulevard, 159th, 160th, 161st, 162nd, 170th, and 182nd Streets. Land uses would not be altered to isolate any one part of the community from the other. See also MR-10: Changes to Community Character.

For clarification, commuter rail would not run on this track. Metro light rail trains would operate within the Metro ROW, and would operate every five minutes during peak periods. System headways would be reduced during early morning (4:00 a.m. to 6:00 a.m.) and late-night hours (7:00 p.m. to 1:00 a.m.) to approximately 15 minutes.

1964-3 The commenter's support for shuttle buses is noted. A High-Frequency Bus Alternative is discussed in Chapter 4, Evaluation of Alternatives, of the Draft EIR. See MR-1: Selection of Alternatives.

1964-4 The commenter's opposition to the Metro ROW alignment and support for increased bus circulation is noted. All comments have been shared with the Metro Board for their consideration.

Submission 1965 Ana Maria Houck

1965-1 Metro has worked diligently to develop feasible and effective mitigation measures to address the potentially significant impacts of the project.

All light rail and freight tracks are designed according to Metro's design criteria with appropriate clearances, and would fit within the existing Metro ROW. See Appendix 2-A, Select ACE Drawings, of the Draft EIR and Appendix B, Select Advanced Conceptual Engineering Drawings-Locally Preferred Alternative, of the Final EIR for more details on the relocated freight and light rail tracks. See MR-8: Light Rail and Freight Train Safety.

Metro has extensive experience overseeing the design and construction of light rail projects and has successfully managed utility relocations for similar transit projects throughout the region. See MR-7: Utility Relocation and Hazardous Materials.

Metro has designed the project to avoid displacement of residents. See the 2023 Real Estate Acquisition Report, published concurrently with the Draft EIR, and the 2025 Real Estate Acquisition Report, published concurrently with the Final EIR, for more detailed information on proposed property acquisitions. In some areas along the Metro ROW, property owners have built out past their property lines and encroached into Metro ROW.

Submission 1966 Sirley Cuevas

1966-1 The commenter's opposition to the Metro ROW alignment and support for the Hawthorne Option is noted. See MR-7: Utility Relocation and Hazardous Materials.

Submission 1968 Nancy Skiba

1968-1 The commenter's support for the Hawthorne Option is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

1968-2 The commenter's concerns are noted. The issues raised in the response are addressed in the following master responses: MR-20: Proximity Impacts of Relocated Freight Tracks, MR-2: Operational Noise Analysis Methodology and Impact Thresholds; MR-3: Operational Noise Project Features and Mitigation Measures; MR-4: Potential Negative Health Effects Related to Noise, Vibration, and Air Quality; and MR-10: Changes to Community Character.

1968-3 See MR-8: Light Rail and Freight Train Safety.

1968-4 A fully underground alignment option was not considered as it would have significantly more impacts on surrounding communities during construction, as well as significantly higher costs. Metro takes public safety very seriously. See MR-9: Light Rail Security.

Submission 1969 Mike Kim

1969-1 Metro has extensive experience overseeing the design and construction of light rail projects and has successfully managed utility relocations for similar transit projects throughout the region. See MR-7: Utility Relocation and Hazardous Materials.

1969-2 The commenter's support for the Hawthorne Option is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives and MR-8: Light Rail and Freight Train Safety.

Submission 1970 Mark Nelson

1970-1 The comment states that, "the Metro Draft EIR is defective and based on, "Redondo Beach Municipal Code (RBMC), evidence from Beach Cities Health District's multimillion dollar investment in Blue Zones and other peer-reviewed studies as cited by the National Institutes of Health (NIH) research findings." See responses to Comments 1970-2 through 1970-17 for responses to specific comments.

1970-2 The project does not violate Redondo Beach Municipal Code 10-2.2502 related to Planning Design Review. Metro, as the CEQA Lead Agency, has the responsibility to determine the appropriate criteria for the project. The Metro ROW is owned by Metro, and not regulated by the City of Redondo Beach. The Redondo Beach Municipal Code does not apply to the Metro ROW.

1970-3 The project does not violate Redondo Beach Municipal Code 4-24.301 related to noise. Metro, as the CEQA Lead Agency, has the responsibility to determine the appropriate criteria for the project, and has utilized the Federal Transportation Administration's (FTA) noise impact criteria, which was specifically developed to address transit noise based on well-documented criteria and research on human response to community noise. See MR-2: Operational Noise Analysis Methodology and Impact Thresholds. As discussed therein, application of the FTA criteria contrasts with the "brightline" operational noise thresholds used by many local jurisdictions, which set fixed operational limits without considering existing noise levels, and in many cases, these city thresholds have already been exceeded by existing conditions.

1970-4 The comment states that, "Project alternatives that use the existing freight right-of-way create a variety of health damages." See MR-4: Potential Negative Health Effects Related to Noise, Vibration, and Air Quality. It is not technically feasible to correlate project-specific effects to specific health outcomes, given the complexity of factors contributing to these conditions. However, health effects related to air quality, noise, and other CEQA resources would be reduced with implementation of the proposed mitigation measures.

1970-5 The comment states that, "Project alternatives that use the existing freight right-of-way damage child development." It is not technically feasible to correlate project-specific effects to specific health outcomes, given the complexity of factors contributing to these conditions. However, health effects related to air quality, noise, and other CEQA resources would be reduced with implementation of the proposed mitigation measures. See MR-4: Potential Negative Health Effects Related to Noise, Vibration, and Air Quality.

1970-6 The commenter has not provided substantial evidence that, "adjustments must be made to project, and no use of the freight right-of-way could be selected by Metro without non-compliance with RBMC and damages to both adults and generations of children." See response to Comments 1970-2 through 1970-5.

1970-7 The project does not violate Redondo Beach Municipal Code 10-2.2502 related to Planning Design Review. Metro, as the CEQA Lead Agency, has the responsibility to determine the appropriate criteria for the project. The Metro ROW is owned by Metro, and not regulated by the City of Redondo Beach. The Redondo Beach Municipal Code does not apply to the Metro ROW.

1970-8 Metro understands concerns regarding property values. However, under CEQA, economic impacts such as changes in property values are not considered environmental impacts. The Draft EIR focuses on physical environmental impacts and measures to mitigate them, as required by CEQA. To address questions and concerns on property values, Metro has prepared more information. See MR-14: Property Values and Impacts to Businesses.

1970-9 The project does not violate Redondo Beach Municipal Code 4-24.301 related to noise. Metro, as the CEQA Lead Agency, has the responsibility to determine the appropriate criteria for the project, and has utilized the FTA's noise impact criteria, which was specifically developed to address transit noise based on well-documented criteria and research on human response to community noise. See MR-2: Operational Noise Analysis Methodology and Impact Thresholds. As discussed therein, application of the FTA criteria contrasts with the "brightline" operational noise thresholds used by many local jurisdictions, which set fixed operational limits without considering existing noise levels, and in many cases, these city thresholds have already been exceeded by existing conditions.

1970-10 The comment does not provide substantial evidence that the project would increase the risk of death and illness from chronic stress. It is not technically feasible to correlate project-specific effects to specific health outcomes, given the complexity of factors contributing to these conditions. However, health effects related to air quality, noise, and other CEQA resources would be reduced with implementation of the proposed mitigation measures. See MR-4: Potential Negative Health Effects Related to Noise, Vibration, and Air Quality. See response to Comment 1970-11 related to the cited Blue Zone Articles.

1970-11 The commenter provides the following quote from a book titled, "Business Engagement in Building Healthy Communities: Workshop Summary": "… widen its main street and raise the speed limit, which, Buettner [Blue Zones CEO] said, creates stress, danger, noise pollution, and air pollution." Metro does not dispute that excessive noise levels could cause adverse health effects. However, refer to Section 3.4, Air Quality, and Section 3.6, Noise and Vibration, of the Draft EIR, for project-specific analysis using health impact criteria established by the FTA and the South Coast Air Quality Management District. Also see MR-4: Potential Negative Health Effects Related to Noise, Vibration, and Air Quality.

The commenter provides the following quote from an article titled, "Stress Makes us Sick": [T]his stress can be chronic, due to a specific situation … exposure to stress in early life can alter the normal development … resulting in increased sensitivity to stress and lifelong health risks in offspring." Metro does not dispute that stress could make people ill. This comment does not dispute the contents of the Draft EIR.

The commenter provides the following quote from an article titled, "Maximize Health and Longevity Using These Stress Management Strategies": "… causes many harmful, often overlooked effects … pain and strain … sleep habits … physical suffering … headache, upset

stomach, or back pain … stress can reduce the ability of your immune system". Metro does not dispute that stress could cause the cited health effects. This comment does not dispute the contents of the Draft EIR.

The commenter provides the following quote from an article titled, "Fighting Chronic Stress from Current Events? You Are Not Alone": "Although people often underestimate the influence of the mind on the body, a growing catalog of research shows that high levels of stress over an extended time can drastically alter physical function and affect nearly every organ system." Metro does not dispute that stress could cause health effects. This comment does not dispute the contents of the Draft EIR.

1970-12 The link provided for the National Geographic article on rail noise and stress in East Palestine is broken. Regardless, articles such as those cited by National Geographic, often address general or cumulative effects of noise from various types of rail or transportation systems, including heavy freight, passenger rail, and light rail. The project is a proposed light rail system, which operates differently than heavy rail of freight systems, with shorter and lighter trains and electric propulsion (reducing noise compared to diesel-powered freight trains). These distinctions mean that impacts identified in general studies may not directly apply to the project. This comment does not dispute the contents of the Draft EIR.

1970-13 The commenter submits an article titled, "Effects of Exposure to Road, Railway, Airport and Recreational Noise on Blood Pressure and Hypertension" as evidence of project impacts. The project is a proposed light rail system, which operates differently than heavy rail of freight systems, with shorter and lighter trains and electric propulsion (reducing noise compared to diesel-powered freight trains). These distinctions mean that impacts identified in general studies may not directly apply to the project. This comment does not dispute the contents of the Draft EIR.

1970-14 The commenter submits an article titled, "The Effect of Aircraft, Road, and Railway Traffic Noise on Stroke – Results of a Case–Control Study Based on Secondary Data" as evidence of project impacts. The project is a proposed light rail system, which operates differently than heavy rail of freight systems, with shorter and lighter trains and electric propulsion (reducing noise compared to diesel-powered freight trains). These distinctions mean that impacts identified in general studies may not directly apply to the project. This comment does not dispute the contents of the Draft EIR.

1970-15 The commenter submits an article titled, "Transportation Noise and Risk of Tinnitus: A Nationwide Cohort Study from Denmark as evidence of project impacts. The project is a proposed light rail system, which operates differently than heavy rail of freight systems, with shorter and lighter trains and electric propulsion (reducing noise compared to diesel-powered freight trains). These distinctions mean that impacts identified in general studies may not directly apply to the project. This comment does not dispute the contents of the Draft EIR.

1970-16 The commenter submits an article titled, "A study of self-reported health problems of the people living near railway tracks in Raipur city" as evidence of project impacts. The project is a proposed light rail system, which operates differently than heavy rail of freight systems, with shorter and lighter trains and electric propulsion (reducing noise compared to diesel-

powered freight trains). These distinctions mean that impacts identified in general studies may not directly apply to the project. This comment does not dispute the contents of the Draft EIR.

1970-17 See MR-4: Potential Negative Health Effects Related to Noise, Vibration, and Air Quality. It is not technically feasible to correlate project-specific effects to specific health outcomes, given the complexity of factors contributing to these conditions. However, health effects related to air quality, noise, and other CEQA resources would be reduced with implementation of the proposed mitigation measures. Furthermore, the project would not operate 24 hours per day for seven days per week. The proposed hours of operation are 4:00 a.m. one day to 1:00 a.m. the following day. System headways would be reduced during early morning (4:00 a.m. to 6:00 a.m.) and late-night hours (7:00 p.m. to 1:00 a.m.) to approximately 15 minutes.

Submission 1971 Jiri Samuel

1971-1 The commenter's opposition to the Metro ROW alignment is noted. See MR-1: Selection of Alternatives. Metro recognizes the importance of minimizing impacts from light rail and relocated freight operations. Section 3.6, Noise and Vibration, of the Draft EIR, provides a detailed noise analysis and identifies mitigation measures to reduce significant noise impacts. The analysis follows the Federal Transit Administration Transit Noise and Vibration Impact Assessment Manual and evaluates the potential changes from existing conditions. The analysis accounts for the proposed frequency of train operation and proximity to sensitive receptors, such as residences. The noise standards used in the noise analysis are based on exterior noise levels, meaning that impacts were evaluated without assumed closed windows or air conditioning. See MR-2: Operational Noise Analysis Methodology and Impact Thresholds and MR-3: Operational Noise Project Features and Mitigation Measures.

Submission 1972 Jiri Samuel

1972-1 The commenter's opposition to the Metro ROW alignment is noted. See MR-1: Selection of Alternatives. The project under consideration is a light rail transit line to be operated by Metro, not a heavy rail line operated by Metrolink or freight rail. Light rail vehicles are quieter, electrically powered trains that generate less noise compared to larger, diesel operated Metrolink trains and freight operators. Mitigation Measure MM-VIB-3: Pre- and Post-Construction Surveys requires contractors to document damage resulting from vibration impacts during construction and repair them. In addition, as discussed in Section 3.8, Geology and Soils, of the Draft EIR, the project design process would include thorough site geotechnical investigations to ensure the stability of nearby structures. Per Project Feature PF-GEO-1: Metro Geotechnical Design Standards, site-specific geotechnical investigations would be conducted to address foundation and structural safety. The investigation would include engineering and constructions recommendations to ensure surrounding structures are not damaged.

Submission 1973 Jan Kurth

1973-1 The commenter's opposition to the Metro ROW alignment is noted. See MR-1: Selection of Alternatives. See responses to Comments 1973-3, 1973-5, 1973-6, and 1973-7 for specific

responses related to vibration. The project under consideration is a light rail transit line, not a commuter rail line, which typically consists of heavy rail. Light rail vehicles are quieter, electrically powered trains that generate less noise compared to larger, diesel operated Metrolink trains.

Section 3.6, Noise and Vibration, of the Draft EIR identifies locations where potential operational vibration impacts related to structural damage and annoyance would occur and sets forth Mitigation Measures MM-VIB-4: Low Impact Frogs through MM-VIB-6: Ballast Mats. The foregoing mitigation measures would reduce vibration operational annoyance impacts to less than significant. See MR-5: Vibration Impact Types and Impact Thresholds and MR-6: Vibration Analysis During Final Design for more information regarding the vibration analysis in the Draft EIR and during final design.

1973-2 Metro is committed to integrating safety into all Metro rail operations. The project would comply with relevant safety standards, including the California Manual on Uniform Traffic Control Devices, the California Department of Transportation Highway Design Manual, and Metro's Grade Crossing Safety Policy. See MR-8: Light Rail and Freight Train Safety.

1973-3 The project under consideration is a light rail transit line to be operated by Metro, not a heavy rail line operated by Metrolink or freight rail. Light rail vehicles are quieter, electrically powered trains that generate less noise compared to larger, diesel operated Metrolink trains and freight operators. Mitigation Measure MM-VIB-3: Pre- and Post-Construction Surveys requires contractors to document damage resulting from vibration impacts during construction, and repair them. In addition, as discussed in Section 3.8, Geology and Soils, of the Draft EIR, the project design process would include thorough site geotechnical investigations to ensure the stability of nearby structures. Per Project Feature PF-GEO-1: Metro Geotechnical Design Standards, site-specific geotechnical investigations would be conducted to address foundation and structural safety. The investigation would include engineering and constructions recommendations to ensure surrounding structures are not damaged.

1973-4 Metro has worked diligently to develop feasible and effective mitigation measures to address the potentially significant impacts of the project. The construction duration for the LPA is included in the Final EIR. Construction-related activities would proceed in phases, limiting the duration of any impacts at a given location. See MR-21: Cost Estimates and Schedule.

1973-5 See response to Comment 1973-3. As described in Section 3.6, Noise and Vibration, of the Draft EIR, the Federal Transit Administration (FTA) has defined vibration thresholds for human annoyance and structural damage. As shown in Table 3.6-6 of the Draft EIR, the threshold for vibration annoyance is 65 vibration decibels, for "frequent events." The threshold for construction vibration damage is shown in Table 3.6-5, which expresses vibration in terms of peak particle velocity inches per second. The analysis in the Draft EIR evaluates construction vibration impacts based on these established thresholds. For operational vibration impacts, vibration impacts are assessed in terms of human annoyance, as building damage thresholds are much greater than annoyance thresholds and are typically limited to construction activities which generate higher peak vibration levels than freight or light rail trains.

1973-6 See responses to Comments 1973-3 and 1973-5.

1973-7 The commenter's interpretation of the vibration data is inaccurate. Vibration levels were elevated at the El Nido Park measurement location for both northbound and southbound trains, indicating that the observed levels were not solely attributable to variations in train weight. For both loaded and unloaded trains, the highest vibration levels typically occurred with the passage of the locomotive, which is generally the heaviest part of the train.

As described on page 3.6-28 of the Draft EIR, the FTA general assessment methodology does not require vibration measurements. Vibration measurements were primarily conducted to collect samples of vibration generated by the existing freight train pass-bys and not as a requirement to prepare the analysis. As described on Page 3.6-31 of the Draft EIR, where higher vibration propagation was predicted compared to the predicted vibration levels, adjustments were made to calibrate the model such that it reflected higher vibration levels in the vicinity of El Nido Park.

See response to Comment 133-3 regarding vibration mitigation and vibration effects related to annoyance and damage during operations.

The commenter's support for the Hawthorne Option is noted. All comments have been shared with the Metro Board for their consideration.

Submission 1974 Michael Cowan

1974-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1975 Kelly F.

1975-1 A map of the project and options is provided in Figure 1.2-1 of the Draft EIR, located on page 1-3 of the document and page 2-7 of the Final EIR. A map is also available online at Metro's website located here: Metro C Line Extension to Torrance - LA Metro. If accessing Draft EIR or the online map is difficult, printed copies of the map can be requested by contacting Metro at: greenlineextension@metro.net

Additionally, Metro staff are available to assist seniors and other community members in reviewing the map and project details, either by phone at 213-922-4004 or in person at public outreach events and meetings.

The proposed light rail tracks would be built adjacent to the freight tracks within the Metro ROW. While freight tracks would remain, in some locations the freight tracks would be shifted within the Metro ROW to accommodate the light rail tracks. For more information regarding the proposed modifications to the freight tracks, see Section 2.3-1 of the Draft EIR and Chapter 2, Description of the Locally Preferred Alternative, of the Final EIR. Also refer to Appendix 2-A, Select Advanced Conceptual Engineering Drawings, of the Draft EIR and Final EIR Appendix B, Select Advanced Conceptual Engineering Drawings - Locally Preferred Alternative.

Submission 1976 Jay Gould

1976-1 The comment does not address the adequacy of the Draft EIR and is noted for the record. All comments have been shared with the Metro Board for their consideration.

1976-2 The commenter's opposition to the project is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

1976-3 The commenter's objection to the project alignment in proximity to residences is noted. The project is designed to avoid displacement of residents. However, for properties where acquisition is necessary, Metro would comply with all applicable laws and regulations, including the California Relocation Act. See the 2025 Real Estate Acquisitions Report for additional information about property needs associated with the project. See also MR-14: Property Values and Impacts to Businesses.

1976-4 The comment does not address the adequacy of the Draft EIR and is noted for the record. All comments have been shared with the Metro Board for their consideration.

1976-5 The commenter's opposition to the project is noted. As described in the 2023 Alternatives Considered and Eliminated Report, published alongside the Draft EIR, Metro evaluated multiple alternatives and design options for a light rail extension in the South Bay from 2010 to the present day. Prior to the publication of the 2023 Draft EIR, reports analyzing the extension were published in 2009 and 2018. Crenshaw Boulevard would not be a feasible route, as it does not connect to the existing Redondo Beach (Marine) Station.

Submission 1977 Jay Gould

1977-1 The commenter's opposition to the project is noted. See MR-1: Selection of Alternatives. Vibration is addressed in Section 3.6, Noise and Vibration of the Draft EIR. Chapter 4, Evaluation of Alternatives, of the Draft EIR evaluates these impacts with respect to the LPA. Metro has worked diligently to develop feasible and effective mitigation measures to address the potentially significant impacts of the project, including vibration. See MR-5: Vibration Impact Types and Impact Thresholds and MR-6: Vibration Analysis During Final Design.

Submission 1978 Mark Car

1978-1 The commenter's support for the Hawthorne Option is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

1978-2 The comment does not address the adequacy of the Draft EIR and is noted for the record. All comments have been shared with the Metro Board for their consideration.

Submission 1979 Stable

1979-1 Noise is addressed in Section 3.6, Noise and Vibration of the Draft EIR. Chapter 4, Evaluation of Alternatives, of the Draft EIR evaluates these impacts with respect to the LPA. Metro has worked diligently to develop feasible and effective mitigation measures to address the potentially significant impacts of the project, including noise. See MR-2: Operational Noise

Analysis Methodology and Impact Thresholds and MR-3: Operational Noise Project Features and Mitigation Measures.

Metro has undertaken extensive community outreach for potential transit service along the Metro ROW for well over a decade. Metro's outreach program also takes into consideration limited English proficiency within the communities. Most recently, in notifying the community regarding the Locally Preferred Alternative decision at a Metro Board of Directors meeting in May 2024 connection with the Draft EIR open houses, Metro distributed 32,000 flyers to residents, property owners, and businesses within a one-mile radius of all the alignments under study to notify the community of the LPA selection. Additionally, at the request of the City of Lawndale, Metro sent flyers to every resident within Lawndale. All outreach notifications are provided in both English and Spanish. Documentation on the outreach conducted during the environmental review process is available on the Metro project Dropbox, by visiting metro.net/clineext/#documents.

Submission 1980 Teresita Gonzales

1980-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1981 Lyuamila Gurevich

1981-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1982 Anne and Steve Granick

1982-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1983 Ralph Giordano

1983-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1984 Ricardo Gonzalez

1984-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1985 R. Yanase

1985-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1986 Ana Sofia Chappeton

1986-1 The commenter's support for the Elevated/At-Grade Alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1987 Grant Glazebrook

1987-1 The commenter's support for the Hawthorne Option is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1988 Jason Macdonald

1988-1 The commenter's support for the Hawthorne Option is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1989 Anonymous

1989-1 The commenter's support for the Hawthorne Option is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission 1990 can be found in Section 5.3 Responses to Public Agencies

Submission 1991 Holly Osborne

1991-1 Figure 3.2-5 and Figure 3.2-10 incorrectly duplicated the City of Torrance percentage of existing land uses in the resource study area for the Proposed Project and Trench Option (Figure 3.2-5) and Hawthorne Option (Figure 3.2-10) totals.

This error has been corrected in Section 4.6, Corrections and Additions, of the Final EIR. The correction does not change the overall conclusion of the DEIR.

1991-2 See response to Comment 1991-1.

5.6 RESPONSES TO PUBLIC HEARING COMMENTS

Submission PH-1 Armando Vicente

PH-1-1 The commenter's support for the Hawthorne Option and opposition to the Elevated/At-Grade Alignment and Trench Option is noted. All comments have been shared with the Metro Board for its consideration. See MR-1: Selection of Alternatives and MR-10: Changes to Community Character.

Submission PH-2 Josh Standifer

PH-2-1 The use of the Metro ROW as recreational space is acknowledged on page 3.15-38 of the Draft EIR. While Metro recognizes that some residents currently use the Metro ROW as informal recreational space, it is important to note that the Metro ROW is not a designated park or public recreational area. Its primary purpose is rail transportation. The project includes two multi-use paths, expanding access to residential neighborhoods and offering additional recreational options. See MR-10: Changes to Community Character and MR-16: Response to Lawndale and Redondo Beach Community Letter.

PH-2-2 Metro Homeless Outreach Teams are deployed on Metro buses, trains, and stations to engage with unhoused riders and connect them to resources. See MR-18: Homelessness.

PH-2-3 The commenter's support for the Hawthorne Option is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission PH-3 Craig St. John

PH-3-1 Property along Manhattan Beach Boulevard and Inglewood Avenue has been identified as potential location for a traction power substation (TPSS), as well as for a sump pump for the Trench Option. The LPA would not require a sump pump or the use of the parcel. The Draft EIR evaluated multiple TPSS locations, which are updated in the Final EIR Appendix B, Select Advanced Conceptual Engineering Drawings – Locally Preferred Alternative, and would be further refined in the next phase of design, pending certification of the Final EIR and approval of the project by the Metro Board.

PH-3-2 The 2023 Ridership Summary Report, published alongside the Draft EIR, shows that the project is expected to generate between 11,500 to 15,600 daily transit trips (boardings). See MR-15: Metro Ridership Forecasting Methodology.

PH-3-3 The commenter's preference for an elevated alignment in the Metro ROW alignment is noted. The Metro Board has selected an LPA for purposes of the Final EIR, although it has not yet approved the project, including any of the options and alternatives evaluated in the Draft EIR. A final decision will not be made until after the Metro Board reviews the Final EIR, which will include responses to all public comments, including those of the commenter. See MR-1: Selection of Alternatives.

PH-3-4 As described in Section 3.1, Transportation, of the Draft EIR, on page 3.1-15, PF-T-1: Construction Traffic Management Plan (CTMP), a CTMP would be prepared and implemented to manage disruptions during construction. The plan would include strategies

to manage traffic flow, including phased construction to avoid long-term closures, clearly marked detours, and coordination with local agencies to ensure efficient traffic management. As part of Metro's standard practice, the CTMP would explore scheduling certain construction activities, including deliveries and pick-ups of materials, during non-peak travel periods, and the possibility of conducting some construction work at night. The CTMP would be updated as construction progresses to reflect changes and updates at the work areas.

Submission PH-4 Kevin Mitchell

PH-4-1 Metro has worked diligently to develop feasible and effective mitigation measures to address the potentially significant impacts of the project, including those related to noise and vibration. Light rail transit operations differ significantly from freight operations in terms of noise and vibration characteristics. Light rail transit systems use lighter, electrically powered vehicles, resulting in lower noise and vibration levels compared to the diesel-powered freight trains currently operating along the Metro ROW. While the project would introduce light rail noise and would require adjustments to the locations of the existing freight tracks, the project would not increase freight operations.

Section 3.6, Noise and Vibration, of the Draft EIR, provides a comprehensive analysis of potential noise and vibration impacts associated with construction and operation of the Elevated/At-Grade Alignment, the Trench Option, and the Hawthorne Option. In addition, Chapter 4, Evaluation of Alternatives, of the Draft EIR, also evaluates the No Project Alternative, and the LPA. Operational noise and vibration impacts of the Trench Option, the Hawthorne Option and the LPA would be reduced to less than significant levels with mitigation. See MR-3: Operational Noise Project Features and Mitigation Measures and MR-10: Changes to Community Character

Regarding construction impacts, Section 3.6, Noise and Vibration, of the Draft EIR, discloses that construction activities would cause potentially significant noise and vibration impacts. To address these impacts, Mitigation Measures MM-NOI-1: Noise Control Plan and MM-VIB-1: Vibration Control Plan would be implemented to reduce these temporary construction impacts to the maximum extent feasible. Additionally, construction-related activities would proceed in phases, meaning that work would not occur in one location for the entire construction period.

PH-4-2 The mitigation measures included in the Draft EIR are designed to eliminate or lessen potentially significant impacts of the project to environmental resources listed in the CEQA Guidelines. The Draft EIR established existing conditions for each resource addressed in the Draft EIR to appropriately study potential impacts to affected neighborhoods.

Submission PH-5 John Schreiber

PH-5-1 The project provides multiple benefits to the City of Lawndale, including improving mobility in the South Bay and providing equitable access to regional destinations through improved connections to the Metro regional rail system. Stations in the City of Lawndale were proposed as part of the 2018 Supplemental Alternatives Analysis, but were removed from consideration at the request of the City of Lawndale. See MR-19: Project Benefits.

PH-5-2 Metro has worked diligently to develop feasible and effective mitigation measures to address the potentially significant impacts of the project. The use of the Metro ROW as recreational space is acknowledged on page 3.15-38 of the Draft EIR. While Metro recognizes that some residents currently use the Metro ROW as informal recreational space, it is important to note that the Metro ROW is not a designated park or public recreational area. Its primary purpose is rail transportation. The project includes two new multi-use paths, expanding access to residential neighborhoods and offering additional recreational options. See MR-10: Changes to Community Character and MR-16: Response to Lawndale and Redondo Beach Community Letter.

Section 3.2, Land Use and Planning, Section 3.3, Aesthetics, and 3.7, Biological Resources, of the Draft EIR, evaluate potential impacts to natural resources, including trees and green space, along the Metro ROW. Section 3.15-4.5, Public Services and Recreation, of the Draft EIR, concludes that the project would not lead to a significant impact or the need for new or physically altered government facilities to meet demand for parks or recreational areas. Existing parks and recreational facilities in the area would continue to serve residents after project implementation.

PH-5-3 See MR-8: Light Rail and Freight Train Safety. The presence of natural gas lines and petroleum pipelines, their potential impacts, and applicable regulatory requirements are addressed in Sections 3.9, Hazards and Hazardous Materials, and 3.11 Utilities and Service System, of the Draft EIR. Potential impacts of the LPA in this context are evaluated in Chapter 4, Evaluation of Alternatives, of the Draft EIR. In addition, Section 4.13, Corrections and Additions, of the Final EIR expands on the analysis in Section 3.9-4.2.1 of the Draft EIR by clarifying the protocols, construction techniques, regulations, and standards with which the project would comply. As detailed therein, the revisions do not change the Draft EIR's conclusion that the impact related to oil and gas pipelines would be less than significant. See MR-7: Utilities Relocation and Hazardous Materials Safety, MR-8: Light Rail and Freight Train Safety, and MR-20: Proximity Impacts of Relocated Freight Tracks. In addition, the potential for the project to interfere with evacuation plans is addressed on page 3.9-47 of the Draft EIR. The project would not interfere with an emergency response plan or emergency evacuation plan. See MR-12: Emergency Access. The Metro Board has selected an LPA for purposes of the Final EIR, which would fully grade separate the light rail within the Metro ROW.

PH-5-4 In order to provide every commenter with an opportunity to express their opinions during the public hearing, a one-minute time limit was allocated. The public has several other avenues to express their comments, including through the project email, letters, and the project phone number.

Submission PH-6 Chelsea Schreiber

PH-6-1 As discussed on page 3.3-71 and several other locations within Section 3.3, Aesthetics, of the Draft EIR, Metro's Tree Policy requires a minimum tree replacement ratio of 2:1 (or 4:1 if the tree is considered a heritage tree), and the planting of California-native or other drought-tolerant trees. Trees would also be replanted along the corridor to preserve and enhance the aesthetic character of the community.

PH-6-2 Under CEQA, economic impacts such as changes in property values are not considered environmental impacts. The Draft EIR focuses on physical environmental impacts and measures to mitigate them, as required by CEQA. To address questions and concerns on property values, Metro has prepared more information. See MR-14: Property Values and Impacts to Businesses.

PH-6-3 Metro has constructed nearly 120 miles of light rail throughout Los Angeles County. More information on light rail projects can be found https://www.metro.net/projects/. Comments from stakeholders can be found in the Final EIR of each respective Metro project.

PH-6-4 Approximately 178 residential properties are located immediately adjacent to the Metro ROW, and 22 residential properties are located immediately adjacent to the Hawthorne Option. Metro has designed the project to avoid displacement of residents under either the Metro ROW alignments or the Hawthorne Option. See MR-4: Potential Negative Health Effects Related to Noise, Vibration, and Air Quality. Project operations would not introduce a new substantial permanent source of air pollutant emissions along the alignment. The light rail system would be powered by electricity, meaning there would be no direct emissions associated with rail propulsion. Consequently, operation of the light rail would not contribute to air pollution that could affect long-term health concerns such as asthma or cancer. Regarding potential air quality impacts associated with the relocation of the freight tracks, the distance to which the freight track would be shifted would vary all throughout the alignment, with a maximum shift of approximately 25 feet in the industrial areas north of the Torrance TC Station. This relocation is designed to accommodate the light rail tracks while minimizing potential impacts on adjacent properties. See MR-20: Proximity Impacts of Relocated Freight Tracks. Regarding construction impacts, as shown in Table 3.4-21 of the Draft EIR, localized emissions during construction, including those from freight track relocation, would remain below the applicable South Coast Air Quality Management District (SCAQMD) localized screening thresholds, even with sensitive receptors located near the edge of the Metro ROW. For a comparative evaluation of the alignment options and alternatives, see Chapter 4, Evaluation of Alternatives, of the Draft EIR and Section 4.21, Corrections and Additions, of this Final EIR.

PH-6-5 Metro takes the safety and well-being of nearby communities very seriously. Metro has worked diligently to design the project in a manner that avoids impacts to adjacent residential areas and to develop feasible and effective mitigation measures to address potentially significant environmental impacts. See response to Comment PH-6-4.

Submission PH-7 Lena Pullen

PH-7-1 Metro takes the safety and well-being of nearby communities very seriously. See MR-9: Light Rail Security. Metro Homeless Outreach Teams are deployed on Metro buses, trains, and stations to engage with unhoused riders and connect them to resources. See MR-18: Homelessness.

PH-7-2 The Hawthorne Boulevard Option, the Trench Option, and the LPA would fully grade separate light rail from all roadways, thereby avoiding potential conflicts with school-age pedestrians and cyclists. As described in Chapter 2, Project Description, of the Draft EIR, the Elevated/At-Grade Alignment would have two at-grade light rail crossings at 170th and

182nd Streets. During operations, the potential for delays is dependent on dispatch routing of emergency responders to these particular crossings. Emergency responders are dispatched either from the station or from their current location, which means they may not utilize this crossing to arrive at their response destination. Alternative routes include Grant Avenue, Artesia Boulevard, and 190th Street. Metro would coordinate with involved police departments in addressing security and station areas within their respective jurisdictions. Gate operations for at-grade crossings would be configured per California Public Utility Commission standards. The LPA and Trench Option would grade separate light rail at 170th Street and 182nd Street.

During construction, Project Feature PF-T-1: Construction Traffic Management Plan, as described on page 3.1-15 of the Draft EIR, would require Metro to coordinate with the local jurisdictions to minimize disruptions to public services (e.g., schools). This plan would include details on street closure, detour routes, haul routes and staging areas and would be reviewed by the Cities of Lawndale, Redondo Beach, and Torrance. Consistent with standard Metro practice, the construction traffic management plan would account for peak hours to minimize any disruption to student transportation, including access to Lawndale High School and other schools in the district. Project Feature PF-T-1 also requires Metro to coordinate with emergency service providers, including fire, police and EMTs, to ensure emergency access is provided to the construction zones and neighboring land uses. Emergency access points would be clearly marked in consultation with local fire departments to ensure that emergency vehicles could quickly respond to incidents in the community during construction. See MR-12: Emergency Access.

PH-7-3 The commenter's support for the No Build Alternative and opposition to the Hawthorne Boulevard Option and an alignment through the City of Lawndale are noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission PH-8 Eric Hermelin

PH-8-1 Section 3.6. Noise and Vibration, of the Draft EIR, discloses that each alignment option would result in potentially significant construction-related noise and vibration impacts. To address these impacts, the project would implement Mitigation Measures MM NOI-1: Noise Control Plan, MM-VIB-1: Vibration Control Plan, MM-VIB-2: Construction Equipment Location, and MM-VIB-3: Pre- and Post- Construction Surveys. While implementation of these measures would reduce the construction noise and vibration impacts to the maximum extent feasible, some noise and vibration impacts during construction would remain significant and unavoidable. These impacts would be temporary and would cease upon the completion of construction activities.

The potential operational noise impacts for the Elevated/At-Grade Alignment, the Trench Option, and the Hawthorne Option are addressed in Section 3.6, Noise and Vibration, of the Draft EIR. The potential for LPA impacts is addressed in Chapter 4, Evaluation of Alternatives, of the Draft EIR. See MR-2: Operational Noise Analysis Methodology and Impact Thresholds and MR-3: Operational Noise Project Features and Mitigation Measures.

PH-8-2 The commenter's support for the Hawthorne Option is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission PH-9 Barry Ogle

PH-9-1 The commenter's experience as a retired BNSF conductor remote control engineer is noted. See MR-8: Light Rail and Freight Train Safety.

PH-9-2 The commenter's support for the Hawthorne Option is noted. See MR-1: Selection of Alternatives. Soil conditions and potential impacts along the Metro ROW are identified in Section 3.8, Geology, Soils, and Paleontological Resources, of the Draft EIR. Any design using the Metro ROW would account for these conditions in order to construct and operate the project safely. See MR-13: Soil Stability and Sinkholes.

PH-9-3 Several routes were examined as part of previous phases and studies of the project, but were eliminated from further consideration, as described in the 2023 Alternatives Considered and Eliminated Report, published alongside the Draft EIR. See Chapter 4, Evaluation of Alternatives, of the Draft EIR.

Submission PH-10 Angelica Vicente

PH-10-1 The commenter's concerns regarding the Metro ROW alignments are noted. Metro has designed the project to fit within the Metro ROW and avoid displacement of people from their homes. Metro has designed the project to avoid displacement of residents. See the 2025 Real Estate Acquisition Report, published concurrently with this Final EIR, for more detailed information on proposed property acquisitions. Metro understands the concern related to property values. See MR-14: Property Values and Impacts to Businesses.

PH-10-2 Appendix 2-A, Select Advanced Conceptual Engineering Drawings, of the Draft EIR and Appendix B, Select Advanced Conceptual Engineering Drawings - Locally Preferred Alternative, of the Final EIR show the locations and approximate heights of the retaining walls. The commenter refers to their property near the Metro ROW in the area between 170th Street and Artesia Boulevard. The retaining walls proposed in this area would be approximately the same height as the existing freight track, and would not substantially alter views or affect natural light relative to existing conditions. Figure 3.3-64 in the Draft EIR provides a simulation of a similar scenario, where the retaining wall near Grant Avenue would replace the existing earthen berm. Overall, the impacts related to the retaining walls would be similar to the rest of the project as a whole, as discussed in Section 3.3-4.3.2 of the Draft EIR. They would represent a visual change compared to existing conditions but through application of Metro design policies to ensure a high level of quality in design, they would be consistent with local policies regarding visual character and quality. Soundwalls are designed to withstand all but the most severe earthquakes per the California Building Code.

With respect to potential shading, the creation of shade on private property, such as reduced sunlight in private yards, is generally not considered a significant environmental impact unless it affects public spaces or public resources such as parks, open space, or solar access. In addition, because the position of the sun changes throughout the day and year,

any shading from the project features would be temporary and vary in duration, rather than causing continuous loss of light. Furthermore, the scale of retaining walls and soundwalls would generally be similar to the surrounding environment, and would therefore not introduce substantial new shade. Accordingly, shading of individual residences would not constitute a significant impact.

PH-10-3 Noise and vibration are discussed in Section 3.6, Noise and Vibration, of the Draft EIR. The analysis considers both the light rail train and relocated freight tracks. See MR-2: Operational Noise Analysis Methodology, MR-3: Operational Noise Project Features and Mitigation Measures, MR-5: Vibration Impact Types and Impact Thresholds, MR-6: Vibration Analysis During Final Design, and MR-20: Proximity Impacts of Relocated Freight Tracks.

PH-10-4 Metro has extensive experience overseeing the design and construction of light rail projects and has successfully managed utility relocations for similar transit projects throughout the region. See MR-7: Utility Relocation and Hazardous Materials Safety.

PH-10-5 As discussed in Section 3.2, Land Use and Planning, of the Draft EIR, the project would not physically divide a community because residents would still be able to cross the Metro ROW at all existing designated rail crossings located at Inglewood Avenue, Manhattan Beach Boulevard, 159th, 160th, 161st, 162nd, 170th, and 182nd Streets. Land uses would not be altered to isolate any one part of the community from the other. All at-grade crossings for light rail and/or freight would include upgraded safety crossing infrastructure. The LPA, Trench Option, and Hawthorne Option would fully grade separate light rail from all roadways. See MR-10: Changes to Community Character.

Submission PH-11 Rhonda Hofmann Gorman

PH-11-1 In order to provide every commenter with an opportunity to express their opinions, a one-minute time limit was allocated. The public has several other avenues to express their comments, including through the project email, letters, and the project phone number.

PH-11-2 The commenter's opposition to the project is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

PH-11-3 Metro Homeless Outreach Teams are deployed on Metro buses, trains, and stations to engage with unhoused riders and connect them to resources. See MR-18: Homelessness.

Submission PH-12 Ted Hofmann

PH-12-1 The commenter's opposition to the project is noted. The chart that the commenter refers to was displayed at the public hearings showing the Elevated/At-Grade Alignment and Trench and Hawthorne Options analyzed in the Draft EIR, and did not include the alternatives to the project discussed in Chapter 4, Evaluation of Alternatives, of the Draft EIR. See MR-1: Selection of Alternatives.

PH-12-2 See response to Comment PH12-1. The High-Frequency Bus Alternative is considered and analyzed in Chapter 4, Evaluation of Alternatives, of the Draft EIR. CEQA requires that an EIR identify the Environmentally Superior Alternative and discuss the facts that support that

selection. However, the Lead Agency is not obligated to select the Environmentally Superior Alternative for implementation if it would not accomplish the basic project objectives.

PH-12-3 The commenter's opposition to the Hawthorne Option, which may require an overhead easement for the light rail to cross over their property is noted. All comments have been shared with the Metro Board for their consideration.

Submission PH-13 Doris Hofmann

PH-13-1 Metro understands concerns regarding property values. However, under CEQA, economic impacts such as changes in property values are not considered environmental impacts. The Draft EIR focuses on physical environmental impacts and measures to mitigate them, as required by CEQA. To address questions and concerns on property values, Metro has prepared more information. See MR-14: Property Values and Impacts to Businesses.

PH-13-2 The 2023 Ridership Summary Report, published alongside the Draft EIR, shows that the project is expected to generate between 11,500 to 15,600 daily transit trips (boardings). Metro Homeless Outreach Teams are deployed on Metro buses, trains, and stations to engage with unhoused riders and connect them to resources. See MR-18: Homelessness.

PH-13-3 The commenter's opposition to the project is noted. The Draft EIR analyzed a High-Frequency Bus Alternative. Light rail offers travel time savings over bus, as demonstrated in the 2023 Ridership Summary Report, which makes light rail transfer to bus rather than a single ride on a bus preferable to many riders. See MR-1: Selection of Alternatives. Metro has a graffiti program that requires removal of graffiti within 24 hours of being reported. In addition, the Metro Rail Design Criteria requires that a graffiti-resistant coating be applied to furnishings and surfaces to prevent graffiti.

Submission PH-14 Robert Pullen Miles

PH-14-1 The commenter's opposition to the project is noted. All comments have been shared with the Metro Board for their consideration. Metro has worked diligently to develop feasible and effective mitigation measures to address the potentially significant impacts of the project. See MR-1: Selection of Alternatives.

PH-14-2 The use of the Metro ROW as recreational space is acknowledged on page 3.15-38 of the Draft EIR. However, access to the Metro ROW is not authorized, as the Metro ROW is part of an active transportation corridor, nor compliant with freight safety standards. The Metro ROW is not a designated park or public recreational area. Its primary purpose is rail transportation. The project would include new multi-use paths, expanding access to residential neighborhoods and offering safe recreational options. See MR-10: Changes to Community Character and MR-16: Response to Lawndale and Redondo Beach Community Letter.

PH-14-3 Metro has been coordinating with Westwood Building Supplies since early phases of the project and has refined the design to minimize potential disruptions to the property's operations, as well as their storage area, which they lease from Metro. Although construction activities could result in partial and full road closures along Inglewood Avenue

and Manhattan Beach Boulevard, Metro is committed to minimizing disruption to local businesses. As part of Project Feature PF-T-1: Construction Traffic Management Plan, described in Section 3.1, Transportation, of the Draft EIR, the project would include a Construction Traffic Management Plan (CTMP), which would manage closures, maintain access, and coordinate with businesses. The CTMP requires Metro to coordinate with impacted businesses to limit disruptions.

PH-14-4 The commenter's opposition to the project in Lawndale, support for the No Project Alternative, and preference for more buses is noted. The No Project Alternative and a High-Frequency Bus Alternative were analyzed in Section 4, Evaluation of Alternatives, of the Draft EIR. See MR-1: Selection of Alternatives.

Submission PH-15 Pat Nichols

PH-15-1 Metro has worked diligently to develop feasible and effective mitigation measures to address the potentially significant impacts of the project. The Trench Option would reduce noise impacts compared to the Elevated/At-Grade Alignment by blocking the line-of-site between noise sources and nearby receptors and by eliminating the need for audible light rail warning devices at the 170th Street and 182nd Street crossings.

The Metro Board selected the LPA for the purposes of the Final EIR. Similar to the Trench Option, the LPA significantly reduces noise impacts compared to the Elevated/At-Grade Alignment because it eliminates the at-grade crossings at 170th and 182nd Streets. By grade separating the light rail from all roadways, the LPA, Trench Option, and Hawthorne Option avoid the need for audible warning at light rail crossings, such as routine light rail train horns and crossing bells. Operational noise impacts of the LPA, Trench Option, and Hawthorne Option would be less than significant with mitigation. See MR-3: Operational Noise Project Features and Mitigation Measures.

Metro acknowledges that the project would result in light rail noise along the Metro ROW. Per guidance established by the Federal Transit Administration (FTA) in the Transit Noise and Vibration Impact Assessment Manual (2018), the potential for impacts is based on exterior noise levels. The analysis in Section 3.6, Noise and Vibration, of the Draft EIR, demonstrates that with mitigation, exterior noise levels impacts would be below the FTA noise thresholds, regardless of whether windows are open or closed.

PH-15-2 The vibration levels from light rail operations would be significantly lower than those generated by freight trains due to the lighter weight. The vibration analysis considered both light rail trains and relocated freight. Operational vibration annoyance impacts would be mitigated to less than significant with mitigation for the Metro ROW alignments and the Hawthorne Option. Mitigation measures include MM-VIB-4: Low Impact Frogs, MM-VIB-5: Resilient Fasteners, and MM-VIB-6: Ballast Mats. Vibration mitigation measures and locations where they would apply are included on pages 3.6-106 through 3.6-108 of the Draft EIR. Because, with mitigation, the operational vibration levels would be below the FTA's thresholds for annoyance, they would also be well below the levels associated with structural damage to adjacent buildings. In addition, as discussed in Section 3.8, Geology and Soils, of the Draft EIR, the project design process would include thorough site-specific

geotechnical investigations to ensure the stability of nearby structures. Per Project Feature PF-GEO-1: Metro Geotechnical Design Standards, site-specific geotechnical investigations would be conducted to address foundation and structural safety. The investigation would include engineering and construction recommendations to ensure surrounding structures are not damaged. See MR-13: Soil Stability and Sinkholes.

Submission PH-16 Denise

PH-16-1 The LPA and the Trench Option would fully grade separate light rail from all roadways, and would not increase traffic congestion, nor affect emergency access along the Metro ROW. For the Elevated/At-Grade Alignment, the frequency of the railroad crossing gate down time would increase travel times for vehicles relative to existing conditions, but it would not result in the permanent closure of emergency access. All homes and businesses on either side of the Metro ROW are accessible by alternate routes within a half-mile and, therefore, would not be substantially affected by train frequency. See MR-12: Emergency Access for additional information.

Submission PH-17 Andrew Wang

PH-17-1 The commenter's support for the Trench Option is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission PH-18 Jay Gould

PH-18-1 Metro extends its sympathy to the commenter and their family for the experience described. While Metro is not able to comment on individual criminal investigations, safety and security are a top priority for Metro. The commenter's opposition to the project is noted. All comments have been shared with the Metro Board for their consideration. Metro is committed to integrating safety into all Metro rail operations, as well as construction. See MR-9: Light Rail Security.

Submission PH-19 Josh Standifer

PH-19-1 The Draft evaluates potential environmental impacts using established regulatory thresholds and methodologies developed by expert agencies such as the Federal Transit Administration (FTA) and the South Coast Air Quality Management District (SCAQMD). These thresholds are not arbitrary; they are designed to protect public health, safety, and quality of life, based on peer-reviewed research and real-world data. Metro understands concerns regarding the introduction of additional rail infrastructure near residential areas, and has worked diligently to develop feasible and effective mitigation measures to address the potentially significant environmental impacts of the project. See MR-2: Operational Noise Analysis Methodology and Impact Thresholds; MR-3: Operational Noise Project Features and Mitigation Measures; MR-4: Potential Negative Health Effects Related to Noise, Vibration, and Air Quality; MR-5: Vibration Impact types and Impact Thresholds; and MR-8: Light Rail and Freight Train Safety.

PH-19-2 Metro Homeless Outreach Teams are deployed on Metro buses, trains, and stations to engage with unhoused riders and connect them to resources. See MR-18: Homelessness.

PH-19-3 The commenter's support for the Hawthorne Option is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission PH-20 Maria Francis

PH-20-1 The commenter's opposition to the project in Lawndale and support for the Hawthorne Option is noted. See MR-1: Selection of Alternatives. Operation and construction noise impacts and associated mitigation measures are evaluated in Section 3.6, Noise and Vibration, of the Draft EIR. Construction impacts are addressed for each relevant environmental topic in Chapter 4, Evaluation of Alternatives, of the Draft EIR. Chapter 4, Corrections and Additions, of the Final EIR, with mitigation measures proposed as necessary to reduce potentially significant impacts. See MR-3: Operational Noise Project Features and Mitigation Measures. It should also be noted that, with mitigation, the LPA would not result in significant operational noise impacts.

Submission PH-21 Marvin Francis

PH-21-1 The commenter's support for the Hawthorne Option is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

PH-21-2 Metro understands concerns regarding the introduction of additional train infrastructure near residential areas and has worked diligently to develop feasible and effective mitigation measures to address the potentially significant environmental impacts of the project. The commenter's concern about construction impacts is noted. Chapter 3, Affected Environment and Environmental Impact Analyses, of the Draft EIR, analyzes the impacts that would occur during construction and identifies mitigation measures that would be required to reduce impacts.

PH-21-3 Noise impacts associated with operation of the project are analyzed in detail in Section 3.6, Noise and Vibration, of the Draft EIR. Relative to the Elevated/At-Grade Alignment, the LPA and Trench Option within the Metro ROW would significantly reduce noise impacts because they eliminate the at-grade crossings at 170th and 182nd Streets. By grade separating the light rail from all roadways, the LPA, Trench Option, and Hawthorne Option avoid the need for audible warning at light rail crossings, such as routine light rail train horns and crossing bells. Operational noise impacts of the LPA, Trench Option, and the Hawthorne Option would be less than significant with mitigation. See MR-3: Operational Noise Project Features and Mitigation Measures. The anticipated hours of operation would be 4:00 a.m. one day to 1:00 a.m. the following day. System headways would be reduced during early morning (4:00 a.m. to 6:00 a.m.) and late-night hours (7:00 p.m. to 1:00 a.m.) to approximately 15 minutes. This would result in a reduced frequency of trains during these hours and reduced overall noise compared to peak-hour system headways of 5 minutes.

PH-21-4 The commenter's support for the Hawthorne Option is noted. The street improvements on Manhattan Beach Boulevard from Aviation Boulevard to Inglewood Avenue were implemented by the City of Redondo Beach and are unrelated to this project. Those street improvements were completed in early 2025.

Submission PH-22 Tom Wooge

PH-22-1 As discussed in Section 3.2, Land Use and Planning, of the Draft EIR, the project would not physically divide a community because residents would still be able to cross the Metro ROW at all existing designated rail crossings: at Inglewood Avenue, Manhattan Beach Boulevard, 159th, 160th, 161st, 162nd, 170th, and 182nd Streets. There are no legal crossings between 162nd Street and 170th Street. Although some individuals trespass across the Metro ROW, such use is unauthorized. Metro is committed to integrating safety into all Metro rail operations. The project would comply with relevant safety standards, including the California Manual on Uniform Traffic Control Devices, the California Department of Transportation Highway Design Manual, the Americans with Disabilities Act (ADA), and Metro's Grade Crossing Safety Policy. The LPA, the Trench Option, and the Hawthorne Option would fully grade separate light rail from all roadways, thereby avoiding potential conflicts with school-age pedestrians and cyclists. The freight track would remain at-grade, but the project would include new pedestrian safety infrastructure, such as gates, which would improve safety compared to existing conditions, where no pedestrian safety infrastructure exists. The presence of a station could also benefit access to schools for residents, parents, and caretakers. See MR-8: Light Rail and Freight Train Safety and MR-10: Changes to Community Character.

Submission PH-23 Fred Sadegh

PH-23-1 The commenter's concerns for businesses impacts near the corner of Inglewood Avenue and Manhattan Beach Boulevard are noted. It is unclear which alignment the commenter is supporting. The commenter's preference for the alignment located where there is already a train track may be referring to the Metro ROW alignment. The LPA would require permanent acquisition of three industrial parcels near Inglewood Avenue and Condon Avenue (APN # 4080-025-057- 4080-025-059) to locate operational equipment including traction power substation (TPSS), pump station, and grade-crossing infrastructure. There are a few commercial and industrial properties along Inglewood Avenue near Manhattan Beach Boulevard where Metro has identified the need for a temporary construction easement (TCE) or partial acquisition to locate grade-crossing equipment. See the 2025 Real Estate Acquisitions Report for more information. See MR-1: Selection of Alternatives.

Noise and vibration impacts are addressed in Section 3.6, Noise and Vibration, of the Draft EIR. See MR-3: Operational Noise Project Features and Mitigation Measures. It should also be noted that, with mitigation, the LPA, Trench Option, and Hawthorne Option would not result in significant operational noise impacts.

Submission PH-24 Abby Sahjari

PH-24-1 The commenter's concerns for business impacts near the corner of Inglewood Ave and Manhattan Beach Blvd are noted. It is not clear what parcel the commenter is referring to. Metro published the 2023 Real Estate Acquisition Report concurrent with the Draft EIR to identify potentially affected properties and has updated it for the LPA, which identifies potential temporary construction easements (TCEs), partial acquisitions for grade-crossing

infrastructure, and permanent acquisitions for light rail operational equipment for commercial and industrial properties that may be needed for construction and operations. See the 2025 Real Estate Acquisitions Report for updated information.

Submission PH-25 Kehla Guirguis

PH-25-1 Noise impacts associated with the operation of the project are analyzed in detail in Section 3.6, Noise and Vibration, of the Draft EIR. The Elevated/At-Grade Alignment, the Trench Option, and the LPA would include upgrades to existing freight crossings, allowing for the establishment of a Federal Railroad Administration quiet zone. This would eliminate routine freight train horn noise along the Metro ROW in the area. See MR-3: Operational Noise Project Features and Mitigation Measures; MR-7: Utility Relocation and Hazardous Materials Safety; and MR-10: Changes to Community Character.

The commenter's concerns about the potential impacts to privacy, safety, and the character of the neighborhood are noted. The Metro ROW alignments have been designed to stay within the existing Metro ROW, which has been an active freight corridor for decades. Metro has designed the project to avoid encroachment into the surrounding residential areas and reduce impacts wherever feasible. To address concerns related to proximity, safety and privacy, Metro would install new or upgraded fencing and soundwalls along the light rail guideway. These barriers would enhance safety by preventing unauthorized access, reduce operational noise impacts, and help to preserve privacy for adjacent residents. Soundwall design would also include aesthetic treatments to ensure compatibility with surrounding neighborhoods. Landscaping would also be provided along the Metro ROW. Any remaining views from the light rail into adjacent areas would be brief and transitory. Moreover, Metro's light rail trains are not designed for sightseeing; passengers are typically seated facing inward or are engaged in other activities, further limiting the potential for visual intrusion. As project design advances, Metro would continue to work with local communities to ensure a high level of design. As described in Section 3.3, Aesthetics, of the Draft EIR, the project would include Project Feature PF-AES-1: Local Zoning Ordinances and PF-AES-2: Metro Design Standards to ensure compliance with local ordinances and enhance the visual identity and character of the project within surrounding communities.

Submission PH-26 Safah Guirguis

PH-26-1 Noise is addressed in Section 3.6, Noise and Vibration, of the Draft EIR. Metro has established procedures to maintain the cleanliness and appearance of its transit corridors. Metro's standard operations and maintenance plans address routine landscaping, vegetation management, and litter removal activities. See MR-3: Operational Noise Project Features and Mitigation Measures; MR-8: Light Rail and Freight Train Safety; and MR-10: Changes to Community Character.

PH-26-2 The commenter's support for the Hawthorne Option is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission PH-27 Lena Pullen

PH-27-1 Several routes were examined as part of previous phases and studies of the project, but were eliminated from further consideration, as described in the 2023 Alternatives Considered and Eliminated Report, published alongside the Draft EIR. See Chapter 4, Evaluation of Alternatives, of the Draft EIR. See MR-1: Selection of Alternatives.

PH-27-2 Metro Homeless Outreach Teams are deployed on Metro buses, trains, and stations to engage with unhoused riders and connect them to resources. See MR-9: Light Rail Security and MR-18: Homelessness.

PH-27-3 Metro is committed to integrating safety into all Metro rail operations. The project would comply with relevant safety standards, including the California Manual on Uniform Traffic Control Devices, the California Department of Transportation Highway Design Manual, the Americans with Disabilities Act (ADA), and Metro's Grade Crossing Safety Policy. The LPA, Trench Option, and Hawthorne Option would fully grade separate light rail from all roadways, thereby avoiding potential conflicts between light rail and with school-age pedestrians and cyclists, and avoid increasing traffic congestion or inhibiting emergency access. The freight track would remain at-grade, but the project would include new pedestrian safety infrastructure, such as gates, which would improve safety compared to existing conditions, where no pedestrian safety infrastructure exists. The presence of a station could also benefit access to schools for residents and parents. See MR-8: Light Rail and Freight Train Safety and MR-10: Changes to Community Character.

For the Elevated/At-Grade Alignment, the frequency of the railroad crossing gate down time would increase relative to existing conditions, but it would not result in the permanent closure of emergency access. All homes and businesses on either side of the Metro ROW are accessible by alternate routes within a half-mile and therefore not affected by train frequency. See MR-12: Emergency Access.

PH-27-4 The commenter's opposition to the project and support for the No Build Alternative is noted.

Noise and vibration are addressed in Section 3.6, Noise and Vibration, of the Draft EIR. The LPA significantly reduces noise impacts compared to the Elevated/At-Grade Alignment because it eliminates the at-grade crossings at 170th and 182nd Streets. By grade separating the light rail from all roadways, the LPA removes the need for audible warning at light rail crossings, such as routine train horns and crossing bells. Operational noise impacts of the LPA would be less than significant, with mitigation.

Metro understands concerns regarding property values. However, under CEQA, economic impacts such as changes in property values are not considered environmental impacts. The Draft EIR focuses on physical environmental impacts and measures to mitigate them, as required by CEQA. To address questions and concerns on property values, Metro has prepared more information. See MR-14: Property Values and Impacts to Businesses.

Submission PH-28 Angelica Vicente

PH-28-1 Metro has designed the project to fit within the Metro ROW and avoid displacement of residents. Metro understands concerns regarding property values. However, under CEQA, economic impacts such as changes in property values are not considered environmental impacts. The Draft EIR focuses on physical environmental impacts and measures to mitigate them, as required by CEQA. To address questions and concerns on property values, Metro has prepared more information. See MR-14: Property Values and Impacts to Businesses.

PH-28-2 As described in Section 3.8, Geology, Soils, and Paleontological Resources, of the Draft EIR, the project would be designed to accommodate high seismic ground motion and associated consequences in accordance with Metro's geotechnical design standards and thresholds, per Project Feature PF-GEO-1: Metro Geotechnical Design Standards. Site-specific geotechnical investigations would be performed in accordance with the Metro Rail Design Criteria Section 5.6 to incorporate seismic demands and provide engineering solutions. The project would comply with the latest versions of local and state building codes and regulations. See MR-8: Light Rail and Freight Train Safety. See MR-13: Soil Stability and Sinkholes.

PH-28-3 The potential for vibration impacts is addressed in Section 3.6, Noise and Vibration, of the Draft EIR. The vibration levels from light rail operations would be significantly lower than those generated by freight trains, due to the lighter weight. The vibration analysis considered both light rail trains and relocated freight. Operational vibration annoyance impacts would be mitigated to less than significant with mitigation for the Metro ROW alignment and the Hawthorne Option. Mitigation measures include MM-VIB-4: Low Impact Frogs, MM-VIB-5: Resilient Fasteners, and MM-VIB-6: Ballast Mats. Vibration mitigation measures and locations where they would apply are included on pages 3.6-106 through 3.6-108 of the Draft EIR. See MR-5: Vibration Impact Types and Impact Thresholds.

PH-28-4 Metro has extensive experience overseeing the design and construction of light rail projects and has successfully managed utility relocations for similar transit projects throughout the region. The presence of natural gas lines and petroleum pipelines, their potential impacts, and applicable regulatory requirements are addressed in Sections 3.9, Hazards and Hazardous Materials, and 3.11 Utilities and Service System, of the Draft EIR. Potential impacts of the LPA in this context are evaluated in Chapter 4, Evaluation of Alternatives, of the Draft EIR. In addition, Section 4.13, Corrections and Additions, of the Final EIR expands on the analysis in Section 3.9-4.2.1 of the Draft EIR by clarifying the protocols, construction techniques, regulations, and standards with which the project would comply. As detailed therein, the revisions do not change the Draft EIR's conclusion that the impact related to oil and gas pipelines would be less than significant. See MR-7: Utility Relocation and Hazardous Materials Safety and MR-20: Proximity Impacts of Relocated Freight Tracks.

Submission PH-29 Armando Vicente

PH-29-1 The commenter's opposition to a project along the Metro ROW is noted. The project is expected to follow the operating patterns of Metro's current rail lines. The anticipated hours of operation are 4:00 a.m. one day to 1:00 a.m. the following day. System headways would be reduced during early morning (4:00 a.m. to 6:00 a.m.) and late-night hours (7:00

p.m. to 1:00 a.m.) to approximately 15 minutes. This would result in a reduced frequency of trains during these hours and reduced overall noise compared to peak-hour system headways of 5 minutes. Weekend system headways would be reduced compared to weekdays. For purposes of the impact analysis, the Draft EIR assumes that trains would run approximately every 5 to 10 minutes during peak periods (typical commuting hours) and would run approximately every 10 to 20 minutes during non-peak periods, depending on the time of day. The final operating schedule will be determined closer to project operation. More sensitive time periods of the day, such as nighttime hours would have a reduced frequency of trains and therefore reduced overall noise compared to peak-hour system headways of 5 minutes.

The potential operational noise impacts for the Elevated/At-Grade Alignment, the Trench Option, and the Hawthorne Option are addressed in Section 3.6, Noise and Vibration, of the Draft EIR. The potential for LPA impacts is addressed Chapter 4, Evaluation of Alternatives, of the Draft EIR. Like the Trench and Hawthorne Options, the LPA would not result in significant operational noise impact. See MR-2: Operational Noise Analysis Methodology and Impact Thresholds and MR-3: Operational Noise Project Features and Mitigation Measures, and MR-10: Changes to Community Character.

Submission PH-30 Brandon Vickers

PH-30-1 The commenter's support for the project and an at-grade alignment along the Metro ROW is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission PH-31 Sean Moore

PH-31-1 The commenter's opposition to the project is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

PH-31-2 The project is evaluated as a standalone project under CEQA because it has a logical terminus and independent utility, serving a specific transit need between Redondo Beach and Torrance without requiring additional phases to function effectively (*Del Mar Terrace Conservancy, Inc. v. City Council* (1992) 10 Cal. App. 4th 712). The cumulative impact analysis in the Draft EIR incorporates regional projections from the Southern California Association of Governments (SCAG) 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS), which accounts for other projects, including Metro rail, and their combined regional effects. In doing so, the Draft EIR evaluates the potential growth effects from past, present, and probable future projects. Each Metro project has specific local objectives, routes, and impacts that must be assessed individually to ensure an accurate and meaningful analysis under CEQA. Evaluating each project independently allows for the consideration of project-specific conditions, resources, and community concerns, while cumulative impacts are addressed within the framework of regional planning documents. Furthermore, consistent with how CEQA Guidelines Section 15378(c) defines a "project," permit approvals facilitated, in part, by the environmental analysis in the Draft EIR, would be limited to only those associated with the Metro ROW alignments and the Hawthorne Option. Future projects proposed by Metro along other alignments not evaluated by the Draft EIR would be required to undergo their own environmental analysis in accordance

with the requirements established by CEQA. Thus, the Draft EIR adequately evaluates the whole of the action and does not piecemeal.

The commenter also expresses general concerns about the adequacy of mitigation measures, but does not specify which mitigation measures they believe to be deferred or inadequately addressed. All mitigation measures proposed in the Draft EIR are based on established standards, methods and guidelines, commonly accepted under CEQA for large-scale transportation projects. In cases where mitigation measures require further refinements and identify feasible compliance options to achieve those standards.

The commenter further states that the Draft EIR does not adequately address multiple CEQA topics. No reason for this belief is provided in the comment. The Draft EIR complies with CEQA and Metro worked diligently to develop feasible and effective mitigation measures to address the potentially significant impacts of the project.

Finally, the commenter asserts the ridership study is flawed. The operational parameters in the Draft EIR are based on the travel demand modeling performed for the project. This modeling is included in the 2023 Ridership Report, published concurrently with the Draft EIR. See MR-15: Metro Ridership Forecasting Methodology.

Submission PH-32 Jonathan Shultz

PH-32-1 Each environmental topic analyzed in the Draft EIR, including noise and vibration, is evaluated for both construction and operational phases. The operational noise impact analysis is presented in Section 3.6-4.1.2, Noise and Vibration, of the Draft EIR, beginning on page 3.6-46. As concluded therein, the operational noise impact would only be for the Elevated/At-Grade Alignment and at one specific location, which is near 170th Street.

Regarding the Trench Option, the Draft EIR recognizes that the alignment transitions out of the trench south of 170th Street, including the areas noted in the comment. The Trench Option is described in Section 2.3-2, Project Description, of the Draft EIR beginning on page 2-21.

The Metro Board selected the LPA for purposes of the Final EIR, which significantly reduces noise impacts compared to the Elevated/At-Grade Alignment because it eliminates the at-grade crossings at 170th and 182nd Streets. By grade separating the light rail from all roadways, the LPA removes the need for audible warning at light rail crossings, such as routine train horns and crossing bells. See MR-1: Selection of Alternatives.

Submission PH-33 George Gale

PH-33-1 The existing freight rail line is located within the Metro ROW, which runs behind residential properties in Lawndale and Redondo Beach. The proposed light rail alignments that follow the Metro ROW would place the new light rail tracks within that same Metro ROW. Metro has extensive experience overseeing the design and construction of light rail projects and has successfully managed utility relocations for similar transit projects throughout the region. The presence of natural gas lines and petroleum pipelines, their potential impacts, and applicable regulatory requirements are addressed in Sections 3.9, Hazards and Hazardous Materials, and 3.11 Utilities and Service System, of the Draft EIR. Potential

impacts of the LPA in this context are evaluated in Chapter 4, Evaluation of Alternatives, of the Draft EIR. In addition, Section 4.13, Corrections and Additions, of the Final EIR expands on the analysis in Section 3.9-4.2.1 of the Draft EIR by clarifying the protocols, construction techniques, regulations, and standards with which the project would comply. As detailed therein, the revisions do not change the Draft EIR's conclusion that the impact related to oil and gas pipelines would be less than significant. See MR-7: Utility Relocation and Hazardous Materials Safety.

PH-33-2 See response to Comment PH-33-1. Impacts related to soil stability are addressed in Section 3.8, Geology, Soils, and Paleontological Resources, of the Draft EIR. See MR-13: Soil Stability and Sinkholes.

PH-33-3 Metro understands concerns regarding property values. However, under CEQA, economic impacts such as changes in property values are not considered environmental impacts. The Draft EIR focuses on physical environmental impacts and measures to mitigate them, as required by CEQA. To address questions and concerns on property values, Metro has prepared more information. See MR-14: Property Values and Impacts to Businesses.

The potential operational noise impacts for the Elevated/At-Grade Alignment, the Trench Option, and the Hawthorne Option are addressed in Section 3.6, Noise and Vibration, of the Draft EIR. The potential for LPA impacts is addressed Chapter 4, Evaluation of Alternatives, of the Draft EIR. See MR-2: Operational Noise Analysis Methodology and Impact Thresholds and MR-3: Operational Noise Project Features and Mitigation Measures. The project under consideration is a light rail transit line to be operated by Metro, not a heavy rail line operated by Metrolink. Light rail vehicles are quieter, electrically powered trains that generate less noise compared to larger, diesel operated Metrolink trains. Section 3.6, Noise and Vibration, of the Draft EIR, evaluates the potential for noise impacts and mitigation measures in detail.

PH-33-4 See MR-7: Utility Relocation and Hazardous Materials Safety and MR-8: Light Rail and Freight Train Safety.

Submission PH-34 Raul Moratto

PH-34-1 The use of the Metro ROW as recreational space is acknowledged on page 3.15-38 of the Draft EIR. While Metro recognizes that some residents currently use the Metro ROW as informal recreational space, it is important to note that the Metro ROW is part of an active transportation corridor and recreational use of the Metro ROW is unauthorized and not compliant with freight safety standards. The Metro ROW alignments, including the LPA, would provide new multi-use paths, expanding access to residential neighborhoods and offering additional recreational options. See MR-10: Changes to Community Character and MR-16: Response to Lawndale and Redondo Beach Community Letter.

PH-34-2 The commenter's support for the Hawthorne Option is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

PH-34-3 See response to Comment 34-1.

Submission PH-35 Ted Hofmann

PH-35-1 The commenter's opposition to the project is noted. All comments have been shared with the Metro Board for their consideration. The commenter also notes a preference for a bus system should a project be developed within the Metro ROW. A High-Frequency Bus Alternative is analyzed in Chapter 4, Evaluation of Alternatives, of the Draft EIR. See MR-1: Selection of Alternatives.

PH-35-2 The fundamental purpose of the project is to provide high-capacity transit service in the South Bay. All project objectives could be viewed on page ES-4 of the Draft EIR. The 2023 Ridership Summary Report, published alongside the Draft EIR, shows that the project is expected to generate between 11,500 to 15,600 daily transit trips (boardings). See MR-15: Metro Ridership Forecasting Methodology.

Submission PH-36 Amy Lacoe

PH-36-1 The commenter's concern about construction impacts on Hawthorne Boulevard is noted. Chapter 3, Affected Environment and Environmental Impact Analyses, of the Draft EIR, analyzes the impacts that would occur during construction, and identifies mitigation measures that would be required to reduce impacts. As detailed in Section 3.1, Transportation, Project Feature PF-T-1: Construction Traffic Management Plan would ensure that access would be maintained, and disruptions reduced during construction.

PH-36-2 The impacts of the Hawthorne Option to nearby residents are described in Section 3.1, Transportation, Section 3.2, Land Use and Planning, Section 3.3, Aesthetics, Section 3.4, Air Quality, and Section 3.6, Noise and Vibration of the Draft EIR. Mitigation measures are proposed to address these impacts, including MM-NOI-2: Soundwalls, MM-NOI-3: Low Impact Frogs and MM-NOI-5: Wheel Squeal Noise Monitoring, as well as design considerations to maintain aesthetic compatibility and minimize disruptions. See MR-3: Operational Noise Project Features and Mitigation Measures and MR-10: Changes to Community Character.

PH-36-3 In 2009, Metro prepared an alternatives analysis that studied the potential for transit service along all or portions of the Metro ROW and identified the segment between the Redondo Beach (Marine) Station and the Torrance Transit Center as the highest priority project. Since then, several alignments and alternatives have been studied. The 2018 Supplemental Alternatives Analysis report recommended two alignments to be carried forward into environmental analysis: the Metro ROW and the Hawthorne Boulevard alignment (both primarily at-grade alignments).

Submission PH-37 Kim

PH-37-1 Urbanized avian species, including resident birds of prey such as red-tailed hawks and great-horned owls, are protected under the Migratory Birds Treaty Act and the California Fish and Game Code. As discussed in Section 3.7, Biological Resources, of the Draft EIR, these species have potential to occur within the Resource Study Area (RSA), which provides suitable breeding and foraging habitat in the form of trees, vegetation, and man-made structures (see page 3.7-22). The Draft EIR acknowledges that construction activities could temporarily

disturb these habitats. To address this, Mitigation Measure MM-BIO-2: Nesting Bird Season Restrictions and Pre-Construction Surveys, establishes seasonal restrictions and pre-construction surveys to identify and protect active nests. Given the existing anthropogenic disturbance (e.g., vehicular traffic, train traffic, human presence) throughout the RSA, these mitigation measures are anticipated to reduce potential impacts on nesting and foraging birds to less than significant. The project does not propose any permanent changes that would preclude birds from returning to the area after construction. Moreover, birds and terrestrial species in the RSA are adapted to living in an urban environment, and operational impacts would be less than significant.

PH-37-2 The commenter's opposition to a project located in residential neighborhoods is noted. Metro has successfully implemented light rail in residential communities across Los Angeles County, including along the Metro E Line in West Los Angeles and the Metro A Line in South Pasadena, where light rail operates adjacent to homes. Metro has worked diligently to design the project in a way that minimizes disruption and to develop feasible and effective mitigation measures to address potentially significant impacts.

PH-37-3 As described in Section 3.8, Geology, Soils, and Paleontological Resources, of the Draft EIR, the project would be designed to accommodate high seismic ground motion and associated consequences in accordance with Metro's geotechnical design standards and thresholds, per Project Feature PF-GEO-1: Metro Geotechnical Design Standards. Site-specific geotechnical investigations would be performed in accordance with the Metro Rail Design Criteria Section 5.6 to incorporate seismic demands and provide engineering solutions. See MR-8: Light Rail and Freight Train Safety.

Submission PH-38 Marianna Carlton

PH-38-1 The commenter's support for the project is noted. All comments have been shared with the Metro Board for their consideration.

PH-38-2 An additional station along the Hawthorne Option within the City of Lawndale was studied as part of the 2018 Supplemental Alternatives Analysis, but was removed from further consideration at the request of the City of Lawndale. Over the course of several planning studies, the project has been designed to provide convenient access to the Redondo Beach Transit Center and Torrance Transit Center, which were selected based on extensive analysis of connectivity and accessibility and community outreach. The stations would serve as key transit hubs, with existing local bus routes providing access to nearby destinations. While Metro assists in identifying improvements during the planning and design phases, the implementation of local access to regional transit facilities falls under the jurisdiction of the local cities. If the project is approved, Metro would coordinate with the local jurisdictions to assist in this planning.

Submission PH-39 Mike Gallin

PH-39-1 The commenter's support for the Hawthorne Option is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

PH-39-2 Approximately 178 residential properties are located immediately adjacent to the Metro ROW, and 22 residential properties are located immediately adjacent to the Hawthorne Option. Metro has worked diligently to develop feasible and effective mitigation measures to address the potentially significant impacts of the project, including air quality and noise effects to residences.

PH-39-3 The commenter's reiteration of support for the Hawthorne Option is noted.

Submission PH-40 Ray Hollar

PH-40-1 Section 3.3, Aesthetics, of the Draft EIR, evaluates baseline conditions of the existing Metro ROW as an active railroad corridor. This includes not only the current freight train operations, but also the visual characteristics inherent to a railroad corridor, such as railroad tracks and associated infrastructure. In addition, as stated on page 3.3-54 of the Draft EIR, views of the mountains and other landmarks the commenter mentioned are located relatively long distances from the Metro ROW in Lawndale, which makes any possible views of them quite distant. For example, the Hollywood Sign is located approximately 17 miles north/northeast of the Metro ROW in Lawndale. Nonetheless, those distant views would remain available from public streets and sidewalks, even with the addition of project elements such as soundwalls and elevated structure. The implementation of the project would not fundamentally change the use of the Metro ROW as a transportation corridor. The potential for LPA impacts is addressed in Chapter 4, Evaluation of Alternatives, of the Draft EIR.

PH-40-2 The commenter's opposition to the Metro ROW alignment is noted. All comments have been shared with the Metro Board for their consideration. Metro has worked diligently to develop feasible and effective mitigation measures to address the potentially significant impacts of the project. See MR-10: Changes to Community Character.

Submission PH-41 Ted Hoffmann

PH-41-1 The commenter's opposition to the project is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

PH-41-2 It is unclear what problems the commenter is referring to at the Galleria. The Hawthorne Option would be located within Hawthorne Boulevard and would not require any acquisitions of private property as part of the South Bay Galleria.

PH-41-3 The commenter's support for the No Project Alternative or buses is noted. Chapter 4, Evaluation of Alternatives, of the Draft EIR, assesses a No Project Alternative and a High-Frequency Bus Alternative.

Submission PH-42 Lama Barikhan

PH-42-1 The commenter's opposition to the project in Lawndale is noted. Noise and vibration impacts and associated mitigation measures are addressed in Section 3.6, Noise and Vibration, of the Draft EIR. See MR-3: Operational Noise Project Features and Mitigation Measures. Moreover, the LPA significantly reduces noise impacts compared to the

Elevated/At-Grade Alignment because it eliminates the at-grade crossings at 170th and 182nd Streets. By grade separating the light rail from all roadways, the LPA removes the need for audible warning at light rail crossings, such as routine train horns and crossing bells. See MR-1: Selection of Alternatives and MR-10: Changes to Community Character.

PH-42-2 The commenter's support for the No Project Alternative or buses is noted. Chapter 4, Evaluation of Alternatives, of the Draft EIR, assessed a No Project Alternative and a High-Frequency Bus Alternative. The Metro Board reviewed and considered these alternatives when they selected the Hybrid Alternative as the LPA in May 2024.

Submission PH-43 Samsung

PH-43-1 The use of the Metro ROW as recreational space is acknowledged on page 3.15-38 of the Draft EIR. While Metro recognizes that some residents currently use the Metro ROW as informal recreational space, it is important to note that the Metro ROW is not a designated park or public recreational area. Its primary purpose is rail transportation. The project would include two new multi-use paths, expanding access to residential neighborhoods and offering additional recreational options. See MR-10: Changes to Community Character and MR-16: Response to Lawndale and Redondo Beach Community Letter.

Submission PH-44 Lama Barikhan

PH-44-1 The commenter's question appears to refer to a future proposal in 2024 and its potential effect on the housing market. It is unclear what specific proposal the commenter is referencing. If the comment is referring to the proposed C Line Extension Project and its potential impacts on the real estate market, note that economic effects such as changes in property values are not considered physical environmental impacts. The Draft EIR focuses on physical environmental impacts and measures to mitigate them, as required by CEQA. Metro acknowledges community concerns related to property values. See MR-14: Property Values and Impacts to Businesses.

Submission PH-45 Kim

PH-45-1 The project would not pass by 192nd Street. If the commenter intended to say 182nd Street, the project would pass through that area. The project under consideration is a light rail transit line to be operated by Metro, not a heavy rail line operated by Metrolink or freight rail. Light rail vehicles are quieter, electrically powered trains that generate less noise compared to larger, diesel operated Metrolink trains and freight operators. Mitigation Measure MM-VIB-3: Pre- and Post-Construction Surveys requires contractors to document damage resulting from vibration impacts during construction, and repair them. In addition, as discussed in Section 3.8, Geology and Soils, of the Draft EIR, the project design process would include thorough site geotechnical investigations to ensure the stability of nearby structures. Per Project Feature PF-GEO-1: Metro Geotechnical Design Standards, site-specific geotechnical investigations would be conducted to address foundation and structural safety. The investigation would include engineering and construction recommendations to ensure surrounding structures are not damaged. Regarding operational vibration damage, see MR-5: Vibration Impact Types and Impact Thresholds.

PH-45-2 The commenter's support for the Hawthorne Option is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission PH-46 Mike Gallin

PH-46-1 Section 3.6, Noise and Vibration, of the Draft EIR, evaluates potential noise impacts, including those from wheel squeal. According to the Federal Transit Administration's Transit Noise and Vibration Impact Assessment Manual (2018), curves with a radius greater than 1,000 feet do not generate wheel squeal. As a result, the Federal Transit Administration (FTA) recommends designing transit projects to avoid tight curves with radii of less than 1,000 feet to mitigate potential noise impacts. The Elevated/At-Grade Alignment, Trench Option, and the LPA do not include curves with radii less than 1,000 feet, which are the primary cause of wheel squeal. Consequently, wheel squeal is not anticipated under these design conditions.

The Hawthorne Option includes two curves which could potentially produce wheel squeal. Mitigation Measure MM-NOI-5: Wheel Squeal Noise Monitoring would require noise monitoring to identify wheel squeal at two curves with a radius less than 1,000 feet for the Hawthorne Option:

> Curve between Santa Fe Avenue and Inglewood Avenue

> Curve between 161st Street and 163rd Street

If wheel squeal is identified, Metro shall install wayside rail lubrication to ensure wheel squeal does not occur. See MR-3: Operational Noise Project Features and Mitigation Measures.

Submission PH-47 Becky Sitton

PH-47-1 The commenter's support for the Hawthorne Option is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission PH-48 Nancy Cline

PH-48-1 The commenter's opposition to the Hawthorne Option is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

PH-48-2 The commenter reiterates opposition to the Hawthorne Option. The comment does not address the adequacy of the Draft EIR and is noted for the record. All comments have been shared with the Metro Board for their consideration.

Submission PH-49 Kim

PH-49-1 Section 3.6, Noise and Vibration, of the Draft EIR, evaluates potential noise impacts, including those from wheel squeal. According to the Federal Transit Administration's (FTA) Transit Noise and Vibration Impact Assessment Manual (2018), curves with a radius greater than 1,000 feet do not generate wheel squeal. As a result, the FTA recommends designing transit projects to avoid tight curves with radii of less than 1,000 feet to mitigate potential noise impacts. The Elevated/At-Grade Alignment, Trench Option, and the LPA do not include

curves with radii less than 1,000 feet, which are the primary cause of wheel squeal. Consequently, wheel squeal is not anticipated under these design conditions.

The Hawthorne Option includes two curves which could potentially produce wheel squeal. Mitigation Measure MM-NOI-5: Wheel Squeal Noise Monitoring would require noise monitoring to identify wheel squeal at two curves with a radius less than 1,000 feet for the Hawthorne Option:

> Curve between Santa Fe Avenue and Inglewood Avenue

> Curve between 161st Street and 163rd Street

If wheel squeal is identified, Metro shall install wayside rail lubrication to ensure wheel squeal does not occur. See MR-3: Operational Noise Project Features and Mitigation Measures.

The 2023 Ridership Summary Report, published alongside the Draft EIR, shows that the project is expected to generate between 11,500 to 15,600 daily transit trips (boardings). See MR-15: Metro Ridership Forecasting Methodology.

Submission PH-50 Rupesh

PH-50-1 Light rail transit vehicles are much quieter than freight trains because they are electrically powered and propelled by propulsion motors in the wheels of the transit vehicles. Freight locomotives are significantly louder as a result of the large diesel engines needed to propel the train and the freight horn which is sounded on approach to at-grade crossings. For example, a freight locomotive has a reference sound exposure level of 97 A-weighted decibels (dBA) and the freight horn has a reference sound exposure level of 110 dBA. In comparison, a light rail transit vehicle has a reference sound exposure level of 78 dBA, approximately 19 dBA quieter than a freight locomotive. The light rail transit vehicles use a "quacker" horn which produces a relatively low-volume sound (78 dBA at 50 feet in front of the lead vehicle) and has a marginal effect on community noise exposure at train speeds greater than 35 miles per hour. The "quacker" horn is approximately 32 dBA quieter than the freight horn. See MR-3: Operational Noise Project Features and Mitigation Measures.

Submission PH-51 Ted Hofmann

PH-51-1 Regarding existing horn noise from freight trains, for the Metro ROW alignments, the project would enable local cities to establish a Quiet Zone in coordination with the Federal Railroad Administration (FRA). More specifically, as part of Project Feature PF-NV-1: Quiet Zone Equipment Installation, Metro would install all necessary safety equipment to meet FRA standards for the establishment of a freight quiet zone. Additionally, Mitigation Measure MM-NOI-4: Quiet Zone Establishment would require Metro to provide support and guidance to the City of Lawndale, City of Redondo Beach, and City of Torrance to establish a quiet zone(s) from north of Inglewood Avenue to south of 182nd Street. The establishment of a quiet zone would reduce freight noise overall along the Metro ROW by eliminating one of the primary sources of noise from freight trains, the horn, which produces a noise level of 110 decibels. In most cases, with implementation of the quiet zone, freight noise would be

quieter than existing conditions even though the tracks would be in closer proximity to some sensitive receptors.

Light rail transit vehicles are much quieter than freight trains because they are electrically powered and propelled by propulsion motors in the wheels of the transit vehicles. Freight locomotives are significantly louder as a result of the large diesel engines needed to propel the train and the freight horn which is sounded on approach to at-grade crossings. For example, a freight locomotive has a reference sound exposure level of 97 A-weighted decibels (dBA) and the freight horn has a reference sound exposure level of 110 dBA. In comparison, a light rail transit vehicle has a reference sound exposure level of 78 dBA, approximately 19 dBA quieter than a freight locomotive. The light rail transit vehicles use a "quacker" horn which produces a relatively low-volume sound (78 dBA at 50 feet in front of the lead vehicle) and has a marginal effect on community noise exposure at train speeds greater than 35 miles per hour. The "quacker" horn is approximately 32 dBA quieter than the freight horn. See MR-3: Operational Noise Project Features and Mitigation Measures.

Submission PH-52 Kim

PH-52-1 The commenter's opposition to a light rail project in the Metro ROW is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission PH-53 Rupesh

PH-53-1 Metro worked diligently to develop feasible and effective mitigation measures to address the potentially significant impacts of the project, including those related to construction. The Metro Board has selected an LPA for the purposes of the Final EIR, although it has not yet made a final decision on the project, including whether to approve of the options and alternatives evaluated in the Draft EIR or reject the project for approval. A final decision will not be made until after the Metro Board reviews the Final EIR, which includes responses to all public comments, including those of the commenter.

Submission PH-54 Ted Hofmann

PH-54-1 The commenter's opposition to a light rail project in the City of Lawndale is noted. See MR-1: Selection of Alternatives. During construction, Project Feature PF-T-1: Construction Traffic Management Plan, as described on page 3.1-15 of the Draft EIR, requires Metro to coordinate with emergency service providers, including fire, police, and EMTs, to ensure emergency access is provided to the construction zones and neighboring land uses. Emergency access points would be clearly marked in consultation with local fire departments to ensure that emergency vehicles could quickly respond to incidents in the community during construction. See MR-12: Emergency Access.

Submission PH-55 Kevin McKenzie

PH-55-1 The commenter's support for the project is noted. See MR-1: Selection of Alternatives. The C Line Extension would operate as the K Line and connect to the LAX/Metro Transit Station, which serves LAX. The K Lines operate as a north-south line between the South Bay and the

Metro E Line and the C Line now operates east-west between LAX and Norwalk. Both lines would provide a direct connection to LAX.

Submission PH-56 Ray Hollar

PH-56-1 Metro has worked diligently to develop feasible and effective mitigation measures to address the potentially significant impacts of the project, including those related to construction. The potential operational noise impacts for the Elevated/At-Grade Alignment, the Trench option, and the Hawthorne Option are addressed in Section 3.6, Noise and Vibration, of the Draft EIR. The potential for LPA impacts is addressed Chapter 4, Evaluation of Alternatives, of the Draft EIR. Along the Metro ROW, the LPA and Trench Option would significantly reduce noise impacts compared to the Elevated/At-Grade Alignment because they eliminate the at-grade crossings at 170th and 182nd Streets. By grade separating the light rail from all roadways, the LPA, Trench Option and Hawthorne Option avoid the need for audible warning at light rail crossings, such as routine train horns and crossing bells. Operational noise impacts of the LPA would be less than significant with mitigation. See MR-2: Operational Noise Analysis Methodology and Impact Thresholds and MR-3: Operational Noise Project Features and Mitigation Measures. Section 3.6, Noise and Vibration, of the Draft EIR, evaluates potential noise impacts in detail for both construction and operation. The analysis identifies mitigation measures to reduce these impacts to the extent feasible.

PH-56-2 The 2023 Ridership Summary Report, published alongside the Draft EIR, shows that the project is expected to generate between 11,500 to 15,600 daily transit trips (boardings). See MR-15: Metro Ridership Forecasting Methodology. A Metro ride is 75 cents for seniors during peak periods and 35 cents during non-peak periods, with fare capping of $2.50 per day. See Metro website for fare information at www.metro.net/riding/fares/seniors/#how-much-does-it-cost.

Submission PH-57 Amy Lacoe

PH-57-1 The commenter's opposition to the project is noted. See MR-1: Selection of Alternatives. Approximately 178 residential properties are located immediately adjacent to the Metro ROW, and 22 residential properties are located immediately adjacent to the Hawthorne Option. Metro has worked diligently to develop feasible and effective mitigation measures to address the potentially significant impacts of the project, including air quality and noise effects to residences. The Draft EIR considers and analyzes noise and vibration impacts in Section 3.6. See MR-3: Operational Noise Project Features and Mitigation Measures. Moreover, the LPA significantly reduces noise impacts compared to the Elevated/At-Grade Alignment because it eliminates the at-grade crossings at 170th and 182nd Streets. By grade separating the light rail from all roadways, the LPA removes the need for audible warning at light rail crossings, such as routine train horns and crossing bells.

Submission PH-58 Traber Schroeder

PH-58-1 The commenter's support for the project is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

PH-58-2 The commenter's support for more extensive transit lines, sidewalks, bike lanes and bike parking, is noted. As described in Chapter 2, Description of the Locally Preferred Alternative, of the Final EIR, the project would feature multi-use paths along the Metro ROW, where space permits along Condon Avenue in Lawndale and between Grant Avenue and 182nd Street in Redondo Beach. The new paths would improve neighborhood walking/cycling spaces within neighborhoods where sidewalks do not exist and access to proposed stations. The project has been designed to provide convenient access to the Redondo Beach Transit Center and Torrance Transit Center, which were selected based on extensive analysis of connectivity and accessibility and community outreach. The stations would serve as key transit hubs, with existing local bus routes providing access to nearby destinations. While Metro assists in identifying improvements during the planning and design phases, the implementation of local access to regional transit facilities falls under the jurisdiction of the local cities. If the project is approved, Metro would coordinate with the local jurisdictions to assist in this planning.

Submission PH-59 Pam Combar

PH-59-1 The commenter's support for the Hawthorne Option is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

PH-59-2 The project's potential impacts related to soil and ground conditions are evaluated in Section 3.8, Geology, Soils, and Paleontological Resources, of the Draft EIR, with additional information regarding soil stability provided in Section 4.12, Corrections and Additions, of the Final EIR. Regarding the sinkhole cited by the commenter and potential for collapsible soil more generally, see MR-13: Soil Stability and Sinkholes.

Submission PH-60 Nathan Koller

PH-60-1 The commenter's support for the project is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission PH-61 Bill Lingar

PH-61-1 CEQA does not require an analysis of safety in terms of crime, as it is not an environmental issue, and therefore the Draft EIR does not make any conclusions regarding this topic. Metro takes the safety and well-being of nearby communities very seriously. See MR-9: Light Rail Security.

Submission PH-62 Kimberly Gillen

PH-62-1 Section 3.6, Noise and Vibration, of the Draft EIR, evaluates potential noise and vibration impacts, including noise impacts from wheel squeal. According to the Federal Transit Administration's (FTA) Transit Noise and Vibration Impact Assessment Manual (2018), curves with a radius greater than 1,000 feet do not generate wheel squeal. As a result, the FTA recommends designing transit projects to avoid curves with radii of less than 1,000 feet to mitigate potential noise impacts. The Elevated/At-Grade Alignment, Trench Option, and the LPA do not include tight curves with radii less than 1,000 feet, which are the primary

cause of wheel squeal. Consequently, wheel squeal is not anticipated under these design conditions.

The Hawthorne Option includes two curves which could potentially produce wheel squeal. Mitigation Measure MM-NOI-5: Wheel Squeal Noise Monitoring would require noise monitoring to identify wheel squeal at two curves with a radius less than 1,000 feet for the Hawthorne Option:

> Curve between Santa Fe Avenue and Inglewood Avenue

> Curve between 161st Street and 163rd Street

If wheel squeal is identified, Metro shall install wayside rail lubrication to ensure wheel squeal does not occur.

PH-62-2 The 2023 Ridership Summary Report, published alongside the Draft EIR, shows that the project is expected to generate between 11,500 to 15,600 daily transit trips (boardings). See MR-15: Metro Ridership Forecasting Methodology.

PH-62-3 The presence of natural gas lines and petroleum pipelines, their potential impacts, and applicable regulatory requirements are addressed in Sections 3.9, Hazards and Hazardous Materials, and 3.11 Utilities and Service System, of the Draft EIR. Potential impacts of the LPA in this context are evaluated in Chapter 4, Evaluation of Alternatives, of the Draft EIR. In addition, Section 4.13, Corrections and Additions, of the Final EIR expands on the analysis in Section 3.9-4.2.1 of the Draft EIR by clarifying the protocols, construction techniques, regulations, and standards with which the project would comply. As detailed therein, the revisions do not change the Draft EIR's conclusion that the impact related to oil and gas pipelines would be less than significant. See MR-7: Utility Relocation and Hazardous Materials Safety. See MR-8: Light Rail and Freight Train Safety.

In addition, as discussed in Section 3.8, Geology and Soils, of the Draft EIR, the project design process would include thorough site geotechnical investigations to ensure the stability of nearby structures. Per Project Feature PF-GEO-1: Metro Geotechnical Design Standards, site-specific geotechnical investigations would be conducted to address foundation and structural safety. The investigation would include engineering and construction recommendations to ensure surrounding structures are not damaged. See MR-13: Soil Stability and Sinkholes.

Submission PH-63 Aram Chaparyam

PH-63-1 The commenter's support for the Metro ROW alignments is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

PH-63-2 Metro has worked diligently to develop feasible and effective mitigation measures to address the potentially significant impacts of the project.

Submission PH-64 Robin Willinis

PH-64-1 The Metro Board has not committed to approving the project. The Metro Board has selected an LPA for purposes of the Final EIR, although it has not yet approved the project,

including any of the options and alternatives evaluated in the Draft EIR. A final decision will not be made until after the Metro Board reviews the Final EIR, which includes responses to all public comments, including those of the commenter. The Metro Board may select the No Build Alternative. The 2023 Ridership Summary Report, published alongside the Draft EIR, shows that the project is expected to generate between 11,500 to 15,600 daily transit trips (boardings). See MR-15: Metro Ridership Forecasting Methodology.

Submission PH-65 Michael Kim

PH-65-1 Metro takes the safety and well-being of nearby communities very seriously. See MR-9: Light Rail Security.

PH-65-2 The project would comply with relevant safety standards, including the California Manual on Uniform Traffic Control Devices, the California Department of Transportation Highway Design Manual, the Americans with Disabilities Act (ADA), and Metro's Grade Crossing Safety Policy. The LPA, Trench Option and Hawthorne Option would fully grade separate the light rail from all roadways, thereby avoiding potential light rail conflicts with school-age pedestrians and cyclists. The freight track would remain at-grade, but the project would include new pedestrian safety infrastructure, such as gates, which would improve safety compared to existing conditions, where no pedestrian safety infrastructure exists. The presence of a station could also benefit access to schools for residents, parents, and caretakers. Both the LPA and Trench Option would grade separate light rail at 170th Street, which could eliminate conflicts between light rail trains, vehicles, pedestrians, and cyclists and eliminate the need for audible warning sounds to reduce noise to less than significant with mitigation.

PH-65-3 As described in Section 3.8, Geology, Soils, and Paleontological Resources, of the Draft EIR, the project would be designed to accommodate high seismic ground motion and associated consequences in accordance with Metro's geotechnical design standards and thresholds, per Project Feature PF-GEO-1: Metro Geotechnical Design Standards. Site-specific geotechnical investigations would be performed in accordance with the Metro Rail Design Criteria Section 5.6 to incorporate seismic demands and provide engineering solutions. The project would comply with the latest versions of local and state building codes and regulations. See MR-8: Light Rail and Freight Train Safety.

Submission PH-66 Ted Hofmann

PH-66-1 The comment does not raise significant environmental issues or otherwise address the adequacy of the Draft EIR and is noted for the record. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

PH-66-2 The properties mentioned by the commenter relate to the Hawthorne Option, where an overhead (aerial) easement would be needed for the elevated light rail structure to cross over the owner's property. Metro has designed the project to avoid displacement of residents. The maps referenced are from the 2023 Real Estate Acquisitions Report, published concurrently with the Draft EIR.

PH-66-3 As indicated by the commenter, Chapter 4, Evaluation of Alternatives, of the Draft EIR assesses a No Project Alternative and a High-Frequency Bus Alternative.

PH-66-4 CEQA requires that an EIR identify the Environmentally Superior Alternative and discuss the facts that support that selection. However, the Lead Agency is not obligated to select the Environmentally Superior Alternative for implementation if it would not accomplish the basic project objectives.

Submission PH-67 James Eckland

PH-67-1 As shown in Appendix 2-A, Select Advanced Conceptual Engineering Drawings, of the Draft EIR, there would be walkways along the elevated guideway for maintenance of the Hawthorne Option.

PH-67-2 Metro's projects are all designed to National Fire Protection Association (NFPA) and California Public Utilities Commission (CPUC) requirements that cover fire/life safety. Metro has emergency response plans and safety policies and procedures to address incidents that may occur during operation. In the event of an emergency, passengers would be able to exit the train and leave the light rail guideway via walkways. Additionally, communication systems would be integrated into the project equipment to communicate with emergency providers during incidents.

PH-67-3 The commenter's support for the Metro ROW alignments is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission PH-68 George Gillen

PH-68-1 The commenter's opposition to the Metro ROW alignments is noted. See MR-1: Selection of Alternatives. All light rail and freight tracks are designed according to Metro's design criteria with appropriate clearances, which includes space for maintenance. See Appendix 2-A, Select Advanced Conceptual Engineering Drawings of the Draft EIR and Final EIR Appendix B, Select Advanced Conceptual Engineering Drawings - Locally Preferred Alternative, for more details on the relocated freight and light rail tracks. Potential hazard impacts were analyzed in Section 3.9-4, Hazards and Hazardous Materials, of the Draft EIR, and Section 4.13 of this Final EIR and determined to be less than significant. Metro understands concerns regarding property values. However, under CEQA, economic impacts such as changes in property values are not considered environmental impacts. The Draft EIR focuses on physical environmental impacts and measures to mitigate them, as required by CEQA. To address questions and concerns on property values, Metro has prepared more information. See MR-14: Property Values and Impacts to Businesses.

PH-68-2 The commenter's support for a bus system is noted. Chapter 4, Evaluation of Alternatives, of the Draft EIR includes an analysis of a High-Frequency Bus Alternative. For more information regarding the concerns raised in the comment, see MR-1: Selection of Alternatives, MR-3: Operational Noise Project Features and Mitigation Measures, MR-8: Light Rail and Freight Train Safety, MR-12: Emergency Access, and MR-14: Property Values and Impacts to Businesses.

Submission PH-69 Patti Giglio

PH-69-1 The commenter's support for the Metro ROW alignments is noted. See MR-1: Selection of Alternatives. Metro has not conducted an economic impact study for the project. Under CEQA, potential economic effects such as reductions in property values or loss of property tax revenues would not constitute an effect to the physical environment. The Draft EIR focuses on physical environmental impacts and measures to mitigate them, as required by CEQA. To address questions and concerns on property values, Metro has prepared more information. See MR-14: Property Values and Impacts to Businesses. Additionally, Metro's goal is to help businesses continue to thrive throughout and following construction. Metro has developed programs to provide financial assistance to small businesses along transit corridor construction project through the Business Interruption Fund and marketing support through the Eat Shop Play program. More information about these programs is available on the Metro website at https://www.metro.net/about/business-interruption-fund/ and https://eat-shop-play-lametro.hub.arcgis.com/.

Submission PH-70 Bettina Osten

PH-70-1 Metro takes the safety and well-being of nearby communities very seriously. See MR-8: Light Rail and Freight Train Safety. Vibration is discussed in Section 3.6, Noise and Vibration, of the Draft EIR. The analysis considers both the light rail train and relocated freight tracks. See MR-5: Vibration Impact Types and Impact Thresholds.

Submission PH-71 Milan Matsumoto

PH-71-1 The commenter's support for the project and preference for the Hawthorne Option is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission PH-72 Robert Acherman

PH-72-1 The C Line Extension would operate as the K Line and connect to the LAX/Metro Transit Station, which serves LAX. The K Line operates as a north-south line between the South Bay and the Metro E Line and the C Line operates east-west between LAX and Norwalk. Both lines provide a direct connection to LAX.

PH-72-2 The commenter's concerns are noted. Cost effectiveness is one of the project objectives and has been and will continue to be taken into consideration by the Metro Board with respect to this project. See MR-21: Cost Estimates and Schedule.

PH-72-3 Section 3.6, Noise and Vibration, of the Draft EIR evaluates the potential noise and vibration impacts of the project and identifies mitigation measures to reduce these impacts to the extent feasible. The Metro Board selected the LPA for the purposes of the Final EIR. The LPA and Trench Option significantly reduce noise impacts along the Metro ROW compared to the Elevated/At-Grade Alignment because they eliminate the at-grade crossings at 170th and 182nd Streets. By grade separating the light rail from all roadways, the LPA, Trench Option and Hawthorne Option avoid the need for audible warning at light rail crossings, such as routine light rail train horns and crossing bells. Operational noise impacts of the LPA,

Trench Option, and Hawthorne Option would be less than significant with mitigation. See MR-3: Operational Noise Project Features and Mitigation Measures and MR-10: Changes to Community Character. Metro's general contact information is included at this website: https://www.metro.net/about/contacts/. Metro Customer relations handles complaints and feedback.

Submission PH-73 Thomas Dorsey

PH-73-1 The commenter's support for the Trench Option is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission PH-74 Kyle Brubaker

PH-74-1 The commenter's support for the project is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives and MR-14: Property Values and Impacts to Businesses.

Submission PH-75 Massima Darom

PH-75-1 Metro has considered multiple alignment options, starting with the 2009 Alternatives Analysis, which identified the C Line extension to Torrance within the Metro ROW as a priority project. Alignments to other destinations were considered and eliminated in past studies because they did not provide ridership benefits or achieve the project objectives. The project would connect the two new city transit centers in Redondo Beach and Torrance to the Metro rail network. See MR-1: Selection of Alternatives.

PH-75-2 The 2023 Ridership Summary Report, published alongside the Draft EIR, shows that the project is expected to generate between 11,500 to 15,600 daily transit trips (boardings). See MR-15: Metro Ridership Forecasting Methodology.

PH-75-3 The commenter's support for the Hawthorne Option and opposition to the Metro ROW alignment is noted. See MR-1: Selection of Alternatives. Noise is addressed in Section 3.6, Noise and Vibration, of the Draft EIR. See MR-3: Operational Noise Project Features and Mitigation Measures. It should also be noted that, with mitigation, the LPA, Trench Option, and Hawthorne Option would not result in significant operational noise impacts.

Submission PH-76 Paul Miller

PH-76-1 The commenter's support for the Metro ROW alignments and opposition to the Hawthorne Option is noted. See MR-1: Selection of Alternatives. Air quality is addressed in Section 3.4, Air Quality, of the Draft EIR. Traffic congestion and delays (often measured by Level of Service) are not considered significant environmental impacts under CEQA, but Metro prepared a 2023 Transportation Detail Report, published alongside the Draft EIR, providing additional information on potential changes in traffic patterns and impacts not required by CEQA, but for the public's information. See also MR-11: Traffic Delay and Level-of-Service.

Submission PH-77 Michelle Bonnee

PH-77-1 The commenter's opposition to the Hawthorne Option and concerns for cost are noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives and MR-21: Cost Estimates and Schedule.

Submission PH-78 Monica Sweet

PH-78-1 The commenter's support for the Trench Option is noted. See MR-1: Selection of Alternatives and MR-8: Light Rail and Freight Train Safety.

PH-78-2 The Metro Board has selected an LPA for purposes of the Final EIR, although it has not yet approved the project, including any of the options and alternatives evaluated in the Draft EIR. A final decision will not be made until after the Metro Board reviews the Final EIR, which will include responses to all public comments, including those of the commenter.

Submission PH-79 Kim Turner

PH-79-1 The commenter's support for the Metro ROW alignments is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

PH-79-2 The comment does not address the adequacy of the Draft EIR, or otherwise raise significant environmental issues, and is noted for the record. All comments have been shared with the Metro Board for their consideration.

PH-79-3 See response to PH-79-1.

Submission PH-80 Holly Osborne

PH-80-1 Cost estimates are not part of the Draft EIR but were prepared in 2022 and published in 2023 alongside the Draft EIR for public information and Metro Board consideration. The costs estimates for all light rail alternatives considered in the Draft EIR as estimated in 2022 are as follows: Elevated/At-Grade Alignment ($1.96B), Trench Option ($2.84B), Hawthorne Option ($2.96B), and the LPA ($2.23B). These costs were considered by the Metro Board in the May 2024 Board meeting prior to selecting the LPA, and would continue to be a major consideration. See MR-21: Cost Estimates and Schedule. Metro has published refined cost estimates concurrent with the release of the Final EIR.

The commenter's opposition to the Metro ROW alignments is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission PH-81 Ray Hollar

PH-81-1 CEQA does not require funding to be demonstrated in a Draft EIR. However, the May 2024 Board Report, available to the public prior to the Metro Board meeting and reviewed by the Metro Board prior to selecting an LPA, included estimates of how much funding could be expected from identified funding sources, shortfalls, and potential additional sources. The

project has secured funding from Measure R (2008), Measure M (2016), a Transit and Intercity Rail Capital Program (TIRCP) Grant from the California State Transportation Agency, and 3% match contributions from local jurisdictions. Metro is committed to the responsible use of public funds and to managing project costs efficiently, while continuing to pursue additional funding sources to support project delivery.

PH-81-2 The commenter's statement about rental businesses is noted. All comments have been shared with the Metro Board for their consideration.

PH-81-3 It is unclear how the commenter derived their cost per rider figure. The May 2024 Board Report, available to the public prior to the Metro Board meeting and reviewed by the Metro Board prior to selecting an LPA, included cost/benefit information on cost per annual new rider, cost per all annual trips, and cost per reduction in vehicle miles traveled (VMT). In all instances the Elevated/At-Grade Alignment performed the best on this metric of the light rail alignments. The LPA performed second best on cost per annual new rider and cost per reduction in VMT. The Hawthorne Option performed second best in cost per annual trips and worse than the Trench Option in cost per reduction in VMT.

After the close of the Draft EIR comment period, Metro continued to coordinate with the commenter on questions related to cost, including an email sent on April 22, 2024. In the additional correspondence, Metro provided more information regarding cost estimate assumptions.

Submission PH-82 Ted Hofmann

PH-82-1 The commenter's support for the No Project Alternative or the High Frequency Bus Alternative is noted. CEQA requires that an EIR identify the Environmentally Superior Alternative. However, the Lead Agency is not obligated to select the Environmentally Superior Alternative for implementation if it is infeasible. See MR-1: Selection of Alternatives. The Metro Board has selected an LPA for the purposes of the Final EIR. A final decision will not be made until after the Metro Board reviews the Final EIR, which will include responses to all public comments, including those of the commenter.

Submission PH-83 John Schreiber

PH-83-1 Section 3.3, Aesthetics, of the Draft EIR, evaluates baseline conditions of the existing Metro ROW as an active railroad corridor. This includes not only the current freight train operations, but also the visual characteristics inherent to a railroad corridor, such as railroad tracks and associated infrastructure. In addition, as stated on page 3.3-54 of the Draft EIR, views of the mountains and other landmarks the commenter mentioned are located relatively long distances from the Metro ROW in Lawndale, which makes any possible views of them quite distant. For example, the Hollywood Sign is located approximately 17 miles north/northeast of the Metro ROW in Lawndale. Nonetheless, those distant views would remain available from public streets and sidewalks, even with the addition of project elements such as soundwalls and elevated structure. The implementation of the project would not fundamentally change the use of the Metro ROW as a transportation corridor. The potential for LPA impacts is addressed in Chapter 4, Evaluation of Alternatives, of the Draft EIR. See MR-10: Changes to Community Character.

Submission PH-84 Don Szerlip

PH-84-1 The commenter's support for the Metro ROW alignment to directly connect to the Redondo Beach Transit Center is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission PH-85 Jennifer Dodge

PH-85-1 Metro has been exploring options for transit service along the Metro ROW for several decades. Metro purchased the Harbor Subdivision from the precursor to the BNSF in the early 1990s with plans to provide passenger rail service to the South Bay. In 2009, Metro prepared an alternatives analysis that studied the potential for transit service along all, or portions of the Metro ROW and identified the segment between the Redondo Beach (Marine) Station and the Torrance Transit Center as the highest priority project. Since then, several alignments and alternatives have been studied. The project is designed to fit within the Metro ROW. Metro completed a property boundary survey in 2025, the results of which are reflected in the Final EIR Appendix B, Select Advanced Conceptual Engineering Drawings - Locally Preferred Alternative. Chapter 3, Environmental Impact Analyses, of the Draft EIR, analyzes not only the potential impacts of light rail, but impacts associated with modifications to freight tracks as well as their simultaneous operation. See MR-8: Light Rail and Freight Train Safety.

Submission PH-86 Kimberly Gillen

PH-86-1 The project is designed to fit within the Metro ROW. See Appendix 2-A, Select Advanced Conceptual Engineering Drawings, of the Draft EIR, Select Advance Conceptual Engineering Drawings, and Final EIR Appendix B, Select Advanced Conceptual Engineering Drawings - Locally Preferred Alternative. See MR-8: Light Rail and Freight Train Safety.

The Draft EIR, Section 3.9, Hazards and Hazardous Materials and Section 3.11, Utilities and Service Systems, account for the presence of underground utilities. As described in Project Feature PF-US-1: Utility Identification and Coordination, Metro and its contractors would coordinate with utility providers to implement required safety measures during design and construction. See MR-7: Utility Relocation and Hazardous Materials Safety. Section 3.6, Noise and Vibration of the Draft EIR analyze impacts related to noise and vibration.

Metro understands concerns regarding property value. However, under CEQA, economic impacts such as changes in property values are not considered environmental impacts. The Draft EIR focuses on physical environmental impacts and measures to mitigate them, as required by CEQA. To address questions and concerns on property values, Metro has prepared more information. See MR-14: Property Values and Impacts to Businesses.

PH-86-2 See response to Comment 86-1. See also MR-8: Light Rail and Freight Train Safety and MR-20: Proximity Impacts of Relocated Freight Tracks.

Submission PH-87 Erik Ore

PH-87-1 The commenter's support for the Hawthorne Option is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission PH-88 Kimberly Gillen

PH-88-1 The 2023 Ridership Summary Report, published alongside the Draft EIR, shows that the project is expected to generate between 11,500 to 15,600 daily transit trips (boardings). See MR-15: Metro Ridership Forecasting Methodology.

PH-88-2 The commenter's opposition to the Metro ROW alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-8: Light Rail and Freight Train Safety.

PH-88-3 Urbanized avian species, including resident birds of prey such as red-tailed hawks, great-horned owls, and barn owls, are protected under the Migratory Birds Treaty Act and the California Fish and Game Code. As discussed in Section 3.7, Biological Resources, of the Draft EIR, these species have potential to occur within the RSA, which provides suitable breeding and foraging habitat in the form of trees, vegetation, and man-made structures (see page 3.7-22 of the Draft EIR). The Draft EIR acknowledges that construction activities could temporarily disturb these habitats. To address this, Mitigation Measure MM-BIO-2: Nesting Bird Season Restrictions and Pre-Construction Surveys establishes protections for nesting birds, including seasonal restrictions and pre-construction surveys to identify active nests. Given the existing anthropogenic disturbance (e.g., vehicular traffic, train traffic, human presence) throughout the RSA, these measures are anticipated to mitigate potential impacts on local avian species to less than significant. The project does not propose any permanent changes that would preclude birds from returning to the area after construction is completed. Moreover, birds and terrestrial species in the RSA are adapted to living in an urban environment, and operational impacts would be less than significant with mitigation.

PH-88-4 Regarding potential for derailments, see MR-8: Light Rail and Freight Train Safety. Metro is aware of the Friendship Campus, which is currently under construction. The property fronts Inglewood Avenue and is approximately 550 feet from the Metro ROW at the nearest boundary. The presence of the under-construction Friendship Campus within a quarter-mile of the Metro ROW is acknowledged in Section 4.13, Corrections and Additions, of the Final EIR. As discussed in Section 3.9-4.3 of the Draft EIR, although proposed construction activities would occur within a quarter-mile of several existing schools, the project includes Project Feature PF-HHM-2: Demolition Plans, which requires demolition plans detailing the procedures for handling ACMs, LBP, PCB, TWW, and universal waste in accordance with federal and state regulations. The project feature also includes provisions for the handling and transport of contaminated soil in compliance with SCAQMD Rule 116. Additionally, the project includes Project Feature PF-AQ-1: Metro Green Construction Policy Compliance, which would require construction activities to comply with the provisions of the Metro Green Construction Policy related to emissions and fugitive dust control. Furthermore, the project includes Project Feature PF-HHM-1: Handling, Storage, and Transport of Hazardous Materials and Wastes, which requires preparation of plans detailing BMPs for hazardous

materials transport, storage, and use, as well as BMPs for cleanup should releases occur. The Friendship Campus does not alter this conclusion.

Submission PH-89 David Zappacosta

PH-89-1 Section 3.6, Noise and Vibration, of the Draft EIR evaluates vibration impacts to sensitive uses along the proposed alignments, including both vibration annoyance and potential for structural damage during construction. The Draft EIR concludes that construction of the Elevated/At-Grade Alignment would result in one significant and unavoidable vibration damage impact near Grant Avenue, where reconstruction of the freight bridge would require equipment such as an impact pile driver. For all other areas of the corridor, construction methods would generate lower vibration levels, and with implementation of Mitigation Measures MM-VIB-1: Vibration Control Plan and MM-VIB-2: Construction Equipment Location, damage-related vibration impacts would be reduced to less than significant.

The Trench Option, Hawthorne Option, and LPA would not require reconstruction of the Grant Avenue freight bridge and therefore would not result in significant construction vibration damage impacts with mitigation. For more information on vibration damage and annoyance, see MR-5: Vibration Impact Types and Thresholds.

The LPA would also avoid relocating the freight track closer to the Breakwater Village Condominiums; this is one of the reasons it was selected as the LPA.

For additional information on structural concerns, see MR-13: Soil Stability and Sinkholes.

Finally, Metro understands concerns regarding property values. However, under CEQA, economic impacts such as changes in property values are not considered environmental impacts. The Draft EIR focuses on physical environmental impacts and measures to mitigate them, as required by CEQA. To address questions and concerns on property values, Metro has prepared more information. See MR-14: Property Values and Impacts to Businesses.

The Metro Board selected an LPA for the purposes of the Final EIR, but has not approved the project. The Board will make that decision after reviewing the Final EIR, which includes analysis of potential impacts and public input.

PH-89-2 Noise and vibration are addressed in Section 3.6, Noise and Vibration, of Draft EIR. The analysis follows the Federal Transit Administration Transit Noise and Vibration Assessment Manual to evaluate both construction and operational noise impacts, including potential impacts on nearby residences.

The Draft EIR discloses that construction activities may cause temporary noise impacts in exceedance of the Federal Transit Administration (FTA) noise criteria. To address these impacts, Mitigation Measures such as MM-NOI-1: Noise Control Plan and MM-VIB-1: Vibration Control Plan would be implemented to minimize construction noise and vibration to the extent feasible. These plans include measures such as the use of quieter equipment, noise barriers, and monitoring to ensure compliance with the FTA construction noise and vibration criteria to the maximum extent feasible.

The comment references noise levels of 76 and 94 decibels as "punitive" to those living along the Metro ROW. However, it is unclear to which specific noise levels the commenter is referring. Construction noise levels would not be continuous. Regarding operational noise impacts, the Draft EIR assesses those impacts by calculating the total noise exposure at sensitive receptors, which combines the existing noise exposure with the incremental noise caused by the project. The FTA criteria, as shown in Table 3.6-3 and Figure 3.6-2 of the Draft EIR, determine the thresholds for moderate and severe impacts based on existing conditions at each cluster of properties. For example, if the existing noise level at a residence is 50 a-weighted decibels (dBA (L_{dn})), the severe impact threshold would be noise levels above 59 dBA (L_{dn}). These thresholds ensure that noise impacts remain within acceptable levels relative to the existing conditions of the area.

It should also be noted that the frequency of trains has been factored into the analysis, consistent with the FTA guidance. The operational noise impacts for the Metro ROW alignments would be less than significant with mitigation.

See MR-1: Selection of Alternatives, MR-3: Operational Noise Project Features and Mitigation Measures, MR-5: Vibration Impact Types and Impact Thresholds, and MR-10: Changes to Community Character.

PH-89-3 The commenter's opposition to the Metro ROW alignments is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission PH-90 Kevin Mitchell

PH-90-1 See MR-7: Utility Relocation and Hazardous Materials Safety; MR-8: Light Rail and Freight Train Safety; and MR-13: Soil Stability and Sinkholes.

PH-90-2 The commenter's support for the Hawthorne Option is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission PH-91 Niki Negrete-Mitchell

PH-91-1 As discussed in Section 3.8-2.3 of the Draft EIR, the Resource Study Areas (RSAs) for geology, soils, and paleontological resources are the footprints of the Elevated/At-Grade Alignment, Trench Option, and Hawthorne Option. The footprints are defined as the areas necessary to construct, operate, and maintain the Elevated/At-Grade Alignment and Options. The footprints evaluated by the Draft EIR are consistent in soil composition and geologic characteristics with those found throughout Los Angeles County.

According to the utility owner, the sinkhole referenced by the commenter was the result of a broken irrigation line in a residential flower bed and was a localized issue that has since been repaired. Although Metro cannot independently confirm the exact cause, available information suggests it was unrelated to underlying geologic conditions, which differ significantly from the construction methods planned for the project. Drilling operations, especially those involving extraction, could alter subsurface pressure and create voids, increasing the risk of subsidence and sinkholes. In contrast, Metro's construction, including the proposed trenching, would involve controlled excavation with no substantial extraction

of subsurface materials that could destabilize soil layers. In Section 4.3 of Chapter 4, Corrections and Additions, of the Final EIR, the following language has been added to the Project Description regarding construction: "Any existing sinkholes shall be examined by the geotechnical engineer of record prior to construction to inform specific steps needed for unique site conditions." The addition provides further clarity that sinkholes, as well as immediately adjacent features such as existing retaining walls, would be examined as part of site-specific soil investigations, but does not change the conclusions of the Draft EIR. See also MR-13: Soil Stability and Sinkholes.

With respect to underground utilities, including the high-pressure gas lines, see MR-7: Utility Relocation and Hazardous Materials Safety.

With respect to the risk of freight derailment, see MR-8: Light Rail and Freight Train Safety.

With respect to the relocation of the existing freight, see MR-20: Proximity Impacts of Relocated Freight Tracks.

PH-91-2 The commenter's support for the Hawthorne Option and opposition to using the Metro ROW alignments is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission PH-92 Candice Nafissi

PH-92-1 The commenter's support for the Hawthorne Option and opposition to using the Metro ROW is noted. All comments have been shared with the Metro Board for their consideration. The Metro Board selected the Hybrid Alternative as the LPA. See MR-1: Selection of Alternatives.

The Draft EIR analyzes noise impacts and air quality impacts in Sections 3.6, Noise and Vibration, and 3.4, Air Quality, of the Draft EIR, respectively. See MR-3: Operational Noise Project Features and Mitigation Measures and MR-4: Potential Negative Health Effects Related to Noise, Vibration, and Air Quality. It should also be noted that, with mitigation, the LPA, Trench Option, and Hawthorne Option would not result in significant operational noise impacts. With respect to the commenter's assertion that the project would generate noise that "exacerbates Redondo Beach's noise ordinance," see responses to Comments 130-5 and 130-15.

Metro understands concerns regarding property values. However, under CEQA, economic impacts such as changes in property values are not considered environmental impacts. The Draft EIR focuses on physical environmental impacts and measures to mitigate them, as required by CEQA. To address questions and concerns on property values, Metro has prepared more information. See MR-14: Property Values and Impacts to Businesses.

Submission PH-93 Michelle Lopez

PH-93-1 The commenter's opposition to the project is noted. Metro understands the commenter's concerns regarding property values and crime. However, social and economic impacts are not considered environmental impacts under CEQA. The Draft EIR focuses on physical

environmental impacts and measures to mitigate them, as required by CEQA. See MR-14: Property Values and Impacts to Businesses. Metro takes the safety and well-being of nearby communities very seriously. See MR-9: Light Rail Security. Metro Homeless Outreach Teams are deployed on Metro buses, trains, and stations to engage with unhoused riders and connect them to resources. See MR-18: Homelessness.

PH-93-2 See response to Comment 93-1. Metro has not conducted an economic impact study for the project at this time.

Submission PH-94 Cindy Lederman

PH-94-1 Metro has undertaken extensive community outreach for potential transit service along all or portions of the Metro ROW for well over a decade. Metro's outreach program also accommodates the needs of residents with limited English proficiency. Most recently, in advance of the Metro Board of Director's selection of the LPA in May 2024, Metro distributed 32,000 postcards to residents, property owners, and businesses within a one-mile radius of all alignments under study. Additionally, at the request of the City of Lawndale, Metro sent flyers to every resident within Lawndale. All outreach notifications are provided in both English and Spanish. Documentation on the outreach conducted during the environmental review process is available on the Metro project Dropbox, by visiting metro.net/clineext/#documents.

Metro prepared cost estimates for the alignments in 2022, which included the cost of the length of the tracks as well as excavation. See MR-21: Cost Estimates and Schedule. While CEQA does not require an EIR to include project cost information, Metro provided this information to support public understanding of the project alternatives and to inform the Metro Board's selection of the LPA. The costs as estimated in 2022 are as follows: Elevated/At-Grade Alignment ($1.96B), Trench Option ($2.84B), Hawthorne Option ($2.96B), and the LPA ($2.23B). Metro has released refined cost estimates in 2025 dollars, concurrent with the Final EIR.

PH-94-2 The Draft EIR identifies all significant and unavoidable impacts in Chapter 3, Affected Environment and Environmental Impact Analyses, of the Draft EIR. The commenter's support for the Hawthorne Option and opposition to the Metro ROW alignment is noted. See MR-1: Selection of Alternatives and MR-10: Changes to Community Character.

Submission PH-95 Lucas Love

PH-95-1 The commenter's support for the Hawthorne Option and opposition to the Metro ROW alignments is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

The Draft EIR analyzed the project's noise impacts in Section 3.6, Noise and Vibration, of the Draft EIR. See MR-3: Operational Noise Project Features and Mitigation Measures. It should also be noted that, with mitigation, the LPA would not result in significant operational noise impacts.

Potential impacts related to hazardous materials were analyzed in Section 3.9, Hazards and Hazardous Materials, of the Draft EIR, and determined to be less than significant. MR-7:

Utilities Relocation and Hazardous Materials. See MR-8: Light Rail and Freight Train Safety and MR-14: Property Values and Impacts to Businesses, for additional information.

Submission PH-96 Mike Garlan

PH-96-1 Section 3.6, Noise and Vibration, of the Draft EIR, provides a thorough analysis of the project's potential noise and vibration impacts and identifies mitigation measures to reduce significant impacts to the maximum extent feasible. See MR-1: Selection of Alternatives, MR-3: Operational Noise Project Features and Mitigation Measures, and MR-10: Changes to Community Character.

PH-96-2 The potential for aesthetics impacts for the Elevated/At-Grade Alignment and the Trench Option are addressed in Section 3.3, Aesthetics, of the Draft EIR. The potential for aesthetics impacts for the LPA is addressed Chapter 4, Evaluation of Alternatives, of the Draft EIR. None of the Metro ROW alignments would result in temporary or permanent significant aesthetic impacts. The analysis in Section 3.3, Aesthetics, of the Draft EIR, does not assign value judgments to neighborhoods or communities. Instead, every effort was made to be objective in the descriptions of the existing visual conditions. The analysis considers the characteristics of the area, including existing infrastructure, land use, and visual features, to determine whether the project would result in a significant aesthetic impact. The descriptions in the Draft EIR are intended to provide factual context for the analysis and do not reflect Metro's value or perception of the community. Metro values the input of residents and works to ensure that projects enhance neighborhoods and meet the needs of local communities.

See MR-10: Changes to Community Character.

PH-96-3 The commenter's support for the No Project Alternative and secondary preference for the Hawthorne Option is noted. See MR-1: Selection of Alternatives.

Submission PH-97 Colleen Villegas

PH-97-1 The commenter's support for the Hawthorne Option and opposition to the Metro ROW alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

PH-97-2 Vibration is addressed in Section 3.6, Noise and Vibration, of the Draft EIR. With mitigation, the project would not result in significant operational vibration impacts. See MR-5: Vibration Impact Types and Impact Thresholds.

PH-97-3 Metro is not aware of any study linking noise from Metro transit to increased health effects. See response to Comment PH-97-1 and MR-4: Potential Negative Health Effects Related to Noise, Vibration, and Air Quality.

Submission PH-98 Michael Kim

PH-98-1 The Draft EIR analyzes the potential impacts of each project option in Chapter 3, Affected Environment and Environmental Impact Analyses, of the Draft EIR. The impacts of each option are summarized in the Executive Summary of the Draft EIR.

This comment does not identify any specific impacts that lack detail. The conclusions of the Draft EIR are based on technical studies, modeling, and data prepared by qualified experts. Its assumptions and analyses are documented in the report and its technical appendices for public review. If there are specific aspects of the analysis that the commenter believes require clarification or revision, the commenter is encouraged to provide further details so that Metro may address them.

PH-98-2 The frequency of freight operations on the Metro ROW is determined by BNSF, subject to existing agreements and applicable regulatory constraints. Metro does not control the freight train schedule or operations but coordinates with BNSF to ensure continued safe and efficient use of the Metro ROW. The Draft EIR's analysis of freight train operations is based on existing operating patterns, developed in consultation with BNSF and based on observed conditions. While BNSF has the right to operate within the Metro ROW, any substantial increase in freight traffic would require major infrastructure modifications, scheduling adjustments, and regulatory approvals (e.g., from the Federal Railroad Administration and the California Public Utilities Code) that are not reasonably foreseeable at this time. The project would replace freight tracks as needed, in kind, with newer tracks, but it would not increase track capacity. The demand for freight movement along this corridor has remained stable for years, and no changes to freight operation are anticipated.

PH-98-3 See MR-8: Light Rail and Freight Train Safety.

Submission PH-99 Paige Kaluderovic

PH-99-1 The commenter's support for the Hawthorne Option and opposition to the Metro ROW alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives and MR-10: Changes to Community Character.

PH-99-2 See MR-8: Light Rail and Freight Train Safety.

PH-99-3 As described in Section 3.6, Noise and Vibration, of the Draft EIR, soundwalls would be implemented to mitigate noise generated by the light rail and to some extent, noise generated by the freight trains as required by Mitigation Measure MM-NOI-2: Soundwalls. However, two of the primary sources of freight noise are the diesel engines and the horn; soundwalls are less effective at mitigating these due to the height of the engines and horn as well as the decibel level of the horn. Other measures would be implemented to reduce freight noise.

Project Feature PF-NV-1: Quiet Zone Equipment Installation ensures that the project would be quiet zone ready and freight noise is anticipated to be reduced with implementation of Mitigation Measure MM-NOI-4: Quiet Zone Establishment. Per Project Feature PF-NV-1: Quiet Zone Equipment Installation, the eight at-grade freight crossings between Inglewood Ave and 182nd Street have been designed and would be constructed to include all Federal Railroad Administration (FRA) required Supplemental Safety Measures and associated improvements and equipment that are needed to qualify for Automatic FRA Approval to establish a quiet zone. Crossing signal bells would also be set to the minimum noise level of

75 a-weighted decibel (dBA) at 10 feet per American Railway and Engineering and Maintenance of Way requirements.

Mitigation Measure MM-NOI-4: Quiet Zone Establishment would require Metro to cooperate with the City of Lawndale, City of Redondo Beach, and City of Torrance to establish a quiet zone(s) from north of Inglewood Avenue to south of 182nd Street. The quiet zone is anticipated to reduce freight noise overall along the Metro ROW by eliminating one of the primary sources of noise from freight trains, the horn, which produces a noise level of 110 dBA. See MR-3: Operational Noise Project Features and Mitigation Measures.

PH-99-4 While Metro is not responsible for freight operations, the EIR includes mitigation measures to address potential impacts from the freight relocation that occur as part of this project. See response to Comment PH-99-3.

Submission PH-100 Jill Love

PH-100-1 Metro is committed to integrating safety into all Metro rail operations. The project would comply with relevant safety standards, including the California Manual on Uniform Traffic Control Devices, the California Department of Transportation Highway Design Manual, the Americans with Disabilities Act (ADA), and Metro's Grade Crossing Safety Policy. The LPA, Trench Option, and Hawthorne Option would fully grade separate light rail from all roadways, thereby avoiding potential conflicts with pedestrians and cyclists. See MR-8: Light Rail and Freight Train Safety.

PH-100-2 See MR-7: Utility Relocation and Hazardous Materials Safety and MR-13: Soil Stability and Sinkholes for detailed discussions of how construction and operation in the corridor would be managed in the consideration of local soils conditions, including preventing potential impacts to underground utilities, including with respect to groundborne-vibration during construction and operations of the project.

With respect to potential impacts associated with views of the retaining walls, the Draft EIR includes a detailed evaluation of potential visual changes. This assessment uses the Federal Highway Administration's (FHWA) methodology for evaluating visual quality, based on three criteria: vividness (the memorability of the landscape), intactness (the extent to which the landscape is free from visual intrusions), and unity (the coherence and harmony of the landscape). As described in Section 3.3, Aesthetics, of the Draft EIR, the project area is already highly urbanized, with a mix of residential, industrial, and commercial land uses, as well as the existing freight rail corridor. There are no designated scenic vistas or notable natural landscapes within the project's vicinity. As required by Project Feature PF-AES-1: Local Zoning Ordinances, the proposed retaining walls would be developed consistently with Metro's Design Criteria. The addition of these retaining walls would not substantially degrade the visual character of the environment, which, as noted is generally low under all three of FHWA criteria. In many cases, the retaining walls would be screened by fencing, landscaping, or adjacent structures. The addition of retaining walls and other project elements would be considered neutral and would not result in significant aesthetic impacts.

Regarding potential impacts related to flooding as a result of the retaining walls, the project would include a Low-Impact Development (LID) drainage system designed to retain most

stormwater runoff within the project footprint. This system would meet the stormwater quality design volume requirements under the Municipal Separate Storm Sewer System (MS4) Permit established by the Los Angeles Regional Water Quality Control Board (LARWQCB), thereby minimizing flooding on-site and off-site, including in sumps, per Project Feature PF-HWQ-6: Low Impact Development (LID) BMPs per Regional Requirements. Additional runoff from the project would continue to be collected by storm drain facilities. Discharge locations of underdrains installed along the alignment would be the same as existing discharge locations. The retainment of the majority of stormwater runoff within the project footprint and preservation of existing discharge locations reduces the potential for erosion and sedimentation to occur on or off site. Thus, the addition of impervious surfaces would not result in substantial erosion or siltation, and this impact would be less than significant. For the Trench Option, storm water management would be addressed through Project Feature PF-HWQ-7: Trench Operation Runoff Collection and Treatment, which provides for proper collection, treatment, and rerouting of excess runoff, which would prevent flooding, reduce strain on sump pumps and help maintain natural water absorption.

None of the alignment options have potential to cause vibration-related structural damage during operations (see Draft EIR page 3.6-92). During construction, with mitigation, only the Elevated/At-Grade Alignment would result in a potentially significant and unavoidable vibration-related damage impact (see Draft EIR, Sections 3.6-4.3, 4.5-3.6.3, and 4.5-3.6.4). See MR-5: Vibration Impact Types and Impact Thresholds, and MR-6: Vibration Analysis During Final Design for additional information.

PH-100-3 The potential for noise impacts is addressed in Section 3.6, Noise and Vibration, of the Draft EIR. The potential for LPA impacts is addressed in Chapter 4, Evaluation of Alternatives, of the Draft EIR. See MR-2: Operational Noise Analysis Methodology and Impact Thresholds, MR-3: Operational Noise Project Features and Mitigation Measures, and MR-4: Potential Negative Health Effects Related to Noise, Vibration, and Air Quality.

PH-100-4 As explained on page 3.1-3 of the Draft EIR, traffic delay (often measured by level of service) is no longer permissible as a CEQA impact criterion and therefore this analysis and related topics are not addressed in the Draft EIR. See MR-11: Traffic Delay and Level-of-Service and the 2023 Transportation Detail Report, published concurrently with the Draft EIR, for a discussion of traffic conditions. As described in Section 3.1, Transportation, of the Draft EIR, Project Feature PF-T-1: Construction Traffic Management Plan requires contractors to develop a construction management traffic plan. Metro and its contractors would coordinate with emergency providers, schools, local businesses, residents and relevant jurisdictions to manage access and the effects of temporary closures and identify reasonable accommodations or alternatives, which could include limiting construction hours, providing alternate routes or temporary easements, or other strategies. See MR-12: Emergency Access. The Metro Board has selected an LPA for the purpose of the Final EIR, which, like the Trench Option, would fully grade separate the light rail at 182nd Street and therefore have no effect on emergency vehicles along 182nd Street.

PH-100-5 While change in community character does not constitute a significant impact under CEQA, Section 3.2, Land Use and Planning, of the Draft EIR, analyzes the project's consistency or support with the many goals and policies of the jurisdictions along the corridor and finds less than significant impacts. See MR-10: Changes to Community Character.

Submission PH-101 Jerome Chang

PH 101-1 Washington Elementary School and Adams Middle school are both located approximately 1,200 feet from the Metro ROW. Section 3.4, Air Quality, of the Draft EIR, analyzes air quality impacts to sensitive receptors, including schools within the study area. As described in the Draft EIR and Final EIR, the Metro ROW alignments and the LPA would not generate localized emissions that exceed regional air quality standards; therefore, localized air quality impacts to schools would be less than significant.

Section 3.6, Noise and Vibration, of the Draft EIR, analyzes construction-related noise impacts to sensitive uses using a screening distance of 500 feet. Because the schools are located approximately 1,200 feet from the ROW, they are outside of this screening distance. At this distance, typical construction noise would be less than 65 a-weighted decibels (dBA), not accounting for additional noise reduction provided by intervening structures. For the Elevated/At-Grade Alignment, pile driving activity at the Grant Avenue freight bridge would result in an hourly equivalent sound level (Leq) of approximately 67 dBA at the schools. The LPA, Trench Option and Hawthorne Option would not involve constructing a new freight bridge at Grant Avenue.

These estimated noise levels would not exceed the Federal Transit Administration (FTA) daytime construction noise impact criteria of 90 dBA 1-hour Leq. Noise contours for typical construction activities and for pile driving near Washington Elementary School and Adams Middle School are shown in Figure 3.6-13 (page 3.6-27) and Figure 3.6-19 (page 3.6-45) of the Draft EIR, respectively. As shown, neither school is located within the construction noise contours. Mitigation Measure NOI-1 (Noise Control Plan) would be implemented to control noise during construction. The Noise Control Plan would include noise reducing measures to reduce construction noise and noise monitoring to ensure compliance with the FTA noise criteria to the maximum extent feasible.

PH-101-2 See response to Comment PH-101-1. Regarding the potential for concurrent construction activities with other nearby construction projects, Metro is committed to integrating safety into all Metro rail construction activities. As described in Section 3.1, Transportation, of the Draft EIR, Project Feature PF-T-1: Construction Traffic Management Plan, Metro would require contractors to develop a detailed construction traffic management plan (CTMP) prior to the start of localized construction activities. The CTMP would require Metro and its contractors to coordinate with emergency providers, schools, and relevant jurisdictions. Among other things, the plan would address how to maintain access to schools, ensure pedestrian and cyclist safety, and coordinate with emergency service providers to preserve emergency access. The CTMP may also include measures such as limiting construction hours, scheduling material deliveries during off-peak hours, providing off-site truck staging. The plan would also be updated as needed to reflect changing conditions, such as the presence of other active construction in the area, to minimize disruptions and ensure effectiveness. Metro would work closely with the local jurisdictions to reduce impacts and maintain safe, navigable conditions for pedestrians, vehicles, and school operations throughout the construction period.

PH-101-3 The commenter's support for a rapid bus line on Hawthorne Boulevard is noted. A High-Frequency Bus Alternative is analyzed in Chapter 4, Evaluation of Alternatives, of the Draft EIR. See MR-1: Selection of Alternatives.

Submission PH-102 Ted Hoffmann

PH-102-1 The freight train estimates included in the Draft EIR are based on actual operations data collected through field monitoring and coordination with the BNSF.

PH-102-2 As currently designed, the Hawthorne Option would include an elevated structure that would span over a portion of the property identified by the commenter. However, based on the current engineering plans, the project would not require permanent acquisition of the home, but rather an overhead (aerial) easement to cross over a portion of the property. If the Metro Board selects the Hawthorne Option for implementation, Metro would coordinate with potentially affected property owners as needed.

Submission PH-103 Bob Pinzlon

PH-103-1 Several routes were examined as part of previous phases and studies of the project, but were eliminated from further consideration, as described in the 2023 Alternatives Considered and Eliminated Report, published alongside the Draft EIR See Chapter 4, Evaluation of Alternatives, of the Draft EIR.

The commenter's support for Hawthorne Option is noted. See MR-1: Selection of Alternatives. While change in community character does not constitute a significant impact under CEQA, Section 3.2, Land Use and Planning, of the Draft EIR, analyzes the project's consistency or support with the many goals and policies of the jurisdictions along the corridor and finds less than significant impacts. See MR-10: Changes to Community Character.

Submission PH-104 Julie Iffland

PH-104-1 Metro has been exploring options for transit service along the Metro ROW for several decades. Metro purchased the Harbor Subdivision from the precursor to the BNSF in the early 1990s. In 2009, Metro prepared an alternatives analysis that studied the potential for transit service along all or portions of the Metro ROW and identified the segment between the Redondo Beach (Marine) Station and the Torrance Transit Center as the highest priority project. Since then, several alignments and alternatives have been studied. The 2018 Supplemental Alternatives Analysis report recommended two alignments to be carried forward into environmental analysis: the Metro ROW and the Hawthorne Boulevard alignment (both primarily at-grade alignments).

PH-104-2 Metro is committed to integrating safety into all Metro rail operations. The project would comply with relevant safety standards, including the California Manual on Uniform Traffic Control Devices, the California Department of Transportation Highway Design Manual, the Americans with Disabilities Act (ADA), and Metro's Grade Crossing Safety Policy. The LPA, Trench Option and Hawthorne Option would fully grade separate light rail from all roadways, thereby avoiding potential conflicts with school-age pedestrians and cyclists. The

freight track would remain at-grade, but the project would include new pedestrian safety infrastructure, such as gates, which would improve safety compared to existing conditions, where no pedestrian safety infrastructure exists. The presence of a station could also benefit access to schools for residents and parents. See MR-8: Light Rail and Freight Train Safety.

PH-104-3 The commenter's opposition to the Metro ROW alignment, and at-grade options in particular, is noted. The only alignment option with at-grade light rail under consideration is the Elevated/At-Grade Alignment. See MR-1: Selection of Alternatives. As a point of clarification, light rail transit has not been studied by Metro within the City of Manhattan Beach.

Submission PH-105 John Hough

PH-105-1 This comment is noted. The Los Angeles County Transportation Commission, Metro's predecessor, purchased the Harbor Subdivision in the early 1990s from the predecessor of the BNSF Railway, prior to the opening of the Alameda Corridor. The 2009 Harbor Subdivision Alternatives Analysis Study analyzed existing and future transportation conditions and studied many transit alternatives along the 26-mile Metro ROW between Downtown Los Angeles, and the Ports of Los Angeles and Long Beach. The Alternatives Analysis Study recommended a Phased Implementation Strategy that identified a Metro Light Rail extension from Redondo Beach to Torrance as the highest priority for implementation. This 2009 study considered Hawthorne Boulevard as a potential route for this extension. Based on community input, the Trench Option was studied through Lawndale in the Draft EIR.

Submission PH-106 G.P. Sudduth

PH-106-1 Metro understands concerns regarding property values. However, under CEQA, economic impacts such as changes in property values are not considered environmental impacts. The Draft EIR focuses on physical environmental impacts and measures to mitigate them, as required by CEQA. To address questions and concerns on property values, Metro has prepared more information. See MR-14: Property Values and Impacts to Businesses. Also see MR-1: Selection of Alternatives.

PH-106-2 Section 3.6, Noise and Vibration, of the Draft EIR, evaluates potential noise impacts, including those from wheel squeal. According to the Federal Transit Administration's Transit Noise and Vibration Impact Assessment Manual (2018), curves with a radius greater than 1,000 feet do not generate wheel squeal. As a result, the Federal Transit Administration (FTA) recommends designing transit projects to avoid tight curves with radii of less than 1,000 feet to mitigate potential noise impacts. The Elevated/At-Grade Alignment, Trench Option, and the LPA do not include curves with radii less than 1,000 feet, which are the primary cause of wheel squeal. Consequently, wheel squeal is not anticipated under these design conditions.

The Hawthorne Option includes two curves which could potentially produce wheel squeal. Mitigation Measure MM-NOI-5: Wheel Squeal Noise Monitoring would require noise

monitoring to identify wheel squeal at two curves with a radius less than 1,000 feet for the Hawthorne Option:

> Curve between Santa Fe Avenue and Inglewood Avenue

> Curve between 161st Street and 163rd Street

If wheel squeal is identified, Metro shall install wayside rail lubrication to ensure wheel squeal does not occur. See MR-3: Operational Noise Project Features and Mitigation Measures.

Submission PH-107 Niki Negrete-Mitchell

PH-107-1 The commenter's concern about construction impacts is noted. As described in Section 3.6, Noise and Vibration of the Draft EIR, a Noise Control Plan (Mitigation Measure MM-NOI-1: Noise Control Plan) would be implemented to minimize noise levels to below the Federal Transit Administration (FTA) construction noise criteria to the maximum extent feasible. Construction-related activities would proceed in phases, limiting the duration of any impacts at a given location. With respect to construction vibration impacts, Mitigation Measures MM-VIB-1: Vibration Control Plan; MM-VIB-2: Construction Equipment Location; and MM-VIB-3: Pre- and Post-Construction Surveys would be implemented to minimize vibration near sensitive receptors. Metro closely engages with neighborhoods during construction, there would be a designated construction manager that could be contacted to report any construction related concerns. See MR-3: Operational Noise Project Features and Mitigation Measures and MR-4: Potential Negative Health Effects Related to Noise, Vibration, and Air Quality.

PH-107-2 Urbanized avian species, including resident birds of prey such as red-tailed hawks and great-horned owls, are protected under the Migratory Birds Treaty Act and the California Fish and Game Code (CFGC). As discussed in Section 3.7, Biological Resources, of the Draft EIR, species protected under the Migratory Bird Treaty Act (MBTA) and California Fish and Game Code (CFGC) have potential to occur within the Resource Study Area (RSA). This includes resident birds of prey, such as red-tailed hawks and great-horned owls. As stated on page 3.7-22 of the Draft EIR, portions of the RSA, such as El Nido Park, provide urbanized avian species with both suitable breeding and foraging habitat in the form of trees, vegetation, and man-made structures. The Draft EIR acknowledges that construction activities could temporarily disturb these habitats. To address this, Mitigation Measure MM-BIO-2: Nesting Bird Season Restrictions and Pre-Construction Surveys establishes protections for nesting birds, including seasonal restrictions and pre-construction surveys to identify active nests. Given the existing anthropogenic disturbance (e.g., vehicular traffic, train traffic, human presence) throughout the RSA, these measures are anticipated to mitigate potential impacts on local avian species to less than significant. The project does not propose any permanent changes that would preclude birds from returning to the area after construction is completed.

See MR-10: Changes to Community Character.

Submission PH-108 Holly Osborne

PH-108-1 The noise analysis in the Draft EIR follows the Federal Transit Administration (FTA) Transit Noise and Vibration Impact Assessment Manual (2018), which specifies the use of 24-hour time-averaged noise levels to assess the ambient noise environment. These levels capture all sound sources, including the occasional freight train pass-by, as part of the existing baseline. The analysis also incorporates a 10-dBA (a-weighted decibel) penalty for all sound occurring during the nighttime hours (10:00 p.m. to 7:00 a.m.) to account for increased sensitivity to noise during these hours. The effect of the penalty is that in the calculation of 24-hour noise, any event that occurs during the nighttime hours, is equivalent to 10 of the same events during the daytime hours. This ensures the assessment reflects the potential for greater disturbance from nighttime noise events. See MR-2: Operational Noise Analysis Methodology and Impact Thresholds.

Although noise from freight trains is loud and increases the 24-hour average noise levels, its infrequent occurrence during the day means that it does not dominate or skew the overall noise profile. Excluding the freight noise from the existing ambient noise conditions would not comply with FTA methodology and would misrepresent the true ambient noise environment. The 24-hour noise measurements include both periods when the freight is not operating and periods when freight is operating.

Submission PH-109 Lara Duke

PH-109-1 The commenter's support for the Hawthorne Option is noted. See MR-1: Selection of Alternatives. The Draft EIR analyzed biological impacts in Section 3.7, Biological Resources, and concluded that impacts would be less than significant or less than significant with mitigation. See MR-14: Property Values and Impacts to Businesses.

PH-109-2 Section 3.6, Noise and Vibration, of the Draft EIR, includes a comprehensive analysis of the potential noise and vibration impacts of the proposed light rail and freight train operations. Mitigation measures, including MM-NOI-2: Soundwalls, MM-NOI-3: Low Impact Frogs, and MM-NOI-4: Quiet Zone Establishment are designed to reduce noise levels to less than significant for most sensitive receptors. Additionally, the Metro Board selected the LPA for purposes of the Final EIR. The LPA and Trench Option significantly reduce noise impacts compared to the Elevated/At-Grade Alignment because they eliminate the at-grade crossings at 170th and 182nd Streets. By grade separating the light rail from all roadways, the LPA, Trench Option, and Hawthorne Option remove the need for audible warning at light rail crossings, such as routine light rail train horns and crossing bells.

PH-109-3 Metro takes the safety and well-being of nearby communities very seriously. See MR-8: Light Rail and Freight Train Safety and See MR-9: Light Rail Security.

The project has been designed to provide convenient access to the Redondo Beach Transit Center and Torrance Transit Center, which were selected based on extensive analysis of connectivity and accessibility and community outreach. The stations would serve as key transit hubs, with existing local bus routes providing access to nearby destinations. While Metro assists in identifying improvements during the planning and design phases, the implementation of local access to regional transit facilities falls under the jurisdiction of the

local cities. If the project is approved, Metro would coordinate with the local jurisdictions to assist in this planning.

Submission PH-110 Jan Kurth

PH-110-1 The commenter's support for the Hawthorne Option is noted. Metro takes the safety and well-being of nearby communities very seriously. See Section 2.4-1 of the Draft EIR for more information on methods anticipated for retaining wall construction. Also see MR-8: Light Rail and Freight Train Safety.

PH-110-2 The commenter's support for the No Project Alternative, the High-Frequency Bus Alternative, or high-speed buses is noted. The commenter also reiterates support for the Hawthorne Option and opposition to Metro ROW alignment. See MR-1: Selection of Alternatives; MR-4: Potential Negative Health Effects Related to Noise, Vibration, and Air Quality; and MR-10: Changes to Community Character.

Submission PH-111 Shelby Michael

PH-111-1 The commenter's support for the project with a preference for the Hawthorne Option is noted. See MR-1: Selection of Alternatives. The project has been designed to provide convenient access to the Redondo Beach Transit Center and Torrance Transit Center, which were selected based on extensive analysis of connectivity and accessibility and community outreach. The stations would serve as key transit hubs, with existing local bus routes providing access to nearby destinations. While Metro assists in identifying improvements during the planning and design phases, the implementation of local access to regional transit facilities falls under the jurisdiction of the local cities. If the project is approved, Metro would coordinate with the local jurisdictions to assist in this planning.

Submission PH-112 Kimberly

PH-112-1 CEQA does not require an analysis of safety in terms of crime, as it is not an environmental issue, and therefore the Draft EIR does not make any conclusions regarding this topic. Metro takes the safety and well-being of nearby communities very seriously. See MR-9: Light Rail Security and MR-18: Homelessness.

PH-112-2 The commenter's concern about construction impacts is noted. As part of Metro's standard construction management practices, contractors are required to maintain clean and safe work zones, including regular site inspections and debris removal to minimize impacts to the surrounding community. Metro closely engages with neighborhoods during construction, there would be a designated construction manager that could be contacted to report any construction related concerns.

PH-112-3 See MR-8: Light Rail and Freight Train Safety and MR-21: Cost Estimates and Schedule.

Submission PH-113 Holly Osborne

PH-113-1 Project-related noise was estimated using methodologies provided in the Federal Transit Administration (FTA) Transit Noise and Vibration Impact Assessment Manual (2018). The FTA Manual includes screening guidance for distances at which rail transit noise would not

significantly impact land uses. The screening distance for sensitive land uses is 175 feet for obstructed uses and 350 feet for unobstructed uses. The park facilities of William Green Park in Lawndale are approximately 350 feet from the Metro ROW and classrooms are located approximately 0.13 mile (686 feet) from the Metro ROW. William Green Elementary School would not be exposed to excessive noise.

PH-113-2 Metro has undertaken extensive community outreach for potential transit service along all or portions of the Metro ROW for well over a decade. Metro's outreach program also accommodates the needs of residents with limited English proficiency. Most recently, in advance of the Metro Board of Director's selection of the LPA in May 2024, Metro distributed 32,000 postcards to residents, property owners, and businesses within a one-mile radius of all alignments under study. Additionally, at the request of the City of Lawndale, Metro sent flyers to every resident within Lawndale. All outreach notifications are provided in both English and Spanish. Documentation on the outreach conducted during the environmental review process is available on the Metro project Dropbox, by visiting metro.net/clineext/#documents.

Submission PH-114 Chelsea Schreiber

PH-114-1 There are approximately 178 residential properties located immediately adjacent to the Metro ROW, from the Redondo Beach (Marine) Station to the Torrance Transit Center.

PH-114-2 Metro has undertaken extensive community outreach for potential transit service along all or portions of the Metro ROW for well over a decade. Metro's outreach program also accommodates the needs of residents with limited English proficiency. Most recently, in advance of the Metro Board of Director's selection of the LPA in May 2024, Metro distributed 32,000 postcards to residents, property owners, and businesses within a one-mile radius of all alignments under study. Additionally, at the request of the City of Lawndale, Metro sent flyers to every resident within Lawndale. All outreach notifications are provided in both English and Spanish. Documentation on the outreach conducted during the environmental review process is available on the Metro project Dropbox, by visiting metro.net/clineext/#documents.

Submission PH-115 Zein Obagi

PH-115-1 The Executive Summary is intended to provide a high-level overview of the project and its impacts, consistent with CEQA Guidelines section 15123. More detailed information is provided in the body of the Draft EIR, including in Chapter 2, Project Description, of the Draft EIR, which explains that freight track relocation would vary along the Metro ROW. The Draft EIR accurately describes the freight track relocation, which would vary along the Metro ROW, and remain at-grade. The Final EIR will be presented to the Metro Board who, prior to approving the project must certify that it has reviewed and considered the information contained in the Final EIR. Throughout the entire corridor, the width of the Metro ROW is more than sufficient to meet design requirements to safely incorporate the project elements, including for tracks, retaining walls, soundwalls or other barriers, and maintenance access areas. See MR-8: Light Rail and Freight Train Safety. The Draft EIR evaluates the potential impacts of the freight relocation on adjacent residences. See MR-20: Proximity Impacts of Relocated Freight Tracks.

PH-115-2 Project Feature PF-NV-1: Quiet Zone Equipment Installation ensures that equipment would be installed at the eight at-grade freight crossings to ensure seamless implementation of a quiet zone by the cities of Lawndale, Redondo Beach, and Torrance. It does not require discretionary action from the California Public Utilities Commission (CPUC) or other agencies. Project Features PF-NV-2: Crossing Signal Bell Shrouds and PF-NV-3: Gate-Down-Bell-Stop Variance would require CPUC coordination and approval, but based on Metro's past experience with CPUC on similar light rail transit projects, it is fully anticipated that these project features would receive CPUC approval. See MR-3: Operational Noise Project Features and Mitigation Measures.

PH-115-3 The route for the High-Frequency Bus was chosen to maximize the use of existing bus infrastructure on existing arterials and minimize travel time by not deviating off the main roadways. Light rail with dedicated tracks and stations does not face that same constraint as bus. Ridership is discussed in the 2023 Ridership Summary Report, published alongside the Draft EIR. See MR-15: Metro Ridership Forecasting Methodology.

Submission PH-116 Kim Binegar

PH-116-1 Metro has published two alternatives analyses related to a light rail extension to Torrance and the South Bay: the 2009 Harbor Subdivision Alternatives Analysis Report and the 2018 Green Line Extension to Torrance Supplemental Alternatives Analysis Report. These reports can be found on the project website project filing cabinet and include an explanation of their methodology. The Metro Board has selected an LPA for the purposes of the Final EIR, although it has not yet approved the project, including any of the options and alternatives evaluated in the Draft EIR. A final decision will not be made until after the Metro Board reviews the Final EIR, which will include responses to all public comments, including those of the commenter. See MR-1: Selection of Alternatives. The EIR does not weigh factors such as cost and community preferences, as those are outside the scope of CEQA. However, those broader considerations are part of the Metro Board's policy decision-making process. These factors were summarized in Board reports available on the project website and presented in September 2023 and April 2024, prior to the selection of the LPA in May 2024. The Metro Board will consider the findings of the Final EIR, along with all public comments and community input received throughout the process, and take into account other policy considerations, before making any final decision on the project.

Submission PH-117 Mark Cole

PH-117-1 The commenter's support for the project is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

PH-117-2 The project has been designed to provide convenient access to the Redondo Beach Transit Center and Torrance Transit Center, which were selected based on extensive analysis of connectivity and accessibility and community outreach. The stations would serve as key transit hubs, with existing local bus routes providing access to nearby destinations. While Metro assists in identifying improvements during the planning and design phases, the implementation of local access to regional transit facilities falls under the jurisdiction of the local cities. If the project is approved, Metro would coordinate with the local jurisdictions to assist in this planning.

Submission PH-118 Kimberly

PH-118-1 The commenter's opposition to the Metro ROW alignment is noted. See MR-1: Selection of Alternatives and MR-13: Soil Stability and Sinkholes. Metro is aware of the Friendship Campus, which is currently under construction and located approximately 550 feet from the Metro ROW at its closest point. The Draft EIR includes analysis of potential noise, vibration, air quality, and other impacts to receptors located within the vicinity of the Metro ROW, including at this distance. Based on that analysis, the project would not result in significant noise, vibration, pollutant or other impacts to this property. Metro acknowledges that project construction is not anticipated to be complete before the 2028 Olympics.

PH-118-2 The commenter's support for the Hawthorne Option is noted. The project has been studied by Metro well before Los Angeles was awarded as the host city for the 2028 Olympic Games in 2017. Metro has been exploring options for transit service along the Metro ROW for several decades. Metro purchased the Harbor Subdivision from the precursor to the BNSF in the early 1990s. In 2009, Metro prepared an alternatives analysis that studied the potential for transit service along all or portions of the Metro ROW and identified the segment between the Redondo Beach (Marine) Station and the Torrance Transit Center as the highest priority project. Since then, several alignments and alternatives have been studied. The 2018 Supplemental Alternatives Analysis report recommended two alignments to be carried forward into environmental analysis: the Metro ROW and the Hawthorne Boulevard alignment (both primarily at-grade alignments). The project is estimated to serve between 11,500 and 15,600 daily project trips in 2042. Ridership projections are discussed in the 2023 Ridership Summary Report, published alongside the Draft EIR. See MR-15: Metro Ridership Forecasting Methodology.

Submission PH-119 Kim Turner

PH-119-1 The commenter's support for the Metro ROW alignment is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

PH-119-2 See response to Comment PH-119-1.

Submission PH-120 Massimi Darou

PH-120-1 The commenter's opposition to the Metro ROW alignment is noted. See MR-1: Selection of Alternatives. Metro has undertaken extensive community outreach for potential transit service along all or portions of the Metro ROW for well over a decade. Metro's outreach program also takes into consideration limited English proficiency within the communities. Most recently, in connection with the Draft EIR open houses, Metro mailed nearly 32,000 postcards to residents, property owners, and businesses within a one-mile radius of all the alignments under study. Additionally, at the request of the City of Lawndale, Metro sent flyers to every resident within Lawndale. All outreach notifications are provided in both English and Spanish. Documentation on the outreach conducted during the environmental review process is available on the Metro project Dropbox, by visiting metro.net/clineext/#documents.

PH-120-2 The commenter's opposition to the Metro ROW alignments, and support for the Hawthorne Option, High-Frequency Bus Alternative, or No Project Alternative, are noted. Metro has worked diligently to develop feasible and effective mitigation measures to address the potentially significant impacts of the project. See MR-1: Selection of Alternatives; See MR-4: Potential Negative Health Effects Related to Noise, Vibration, and Air Quality; and MR-10: Changes to Community Character.

Submission PH-121 Doug Boswell

PH-121-1 Metro has worked diligently to design the project in a manner that minimizes property acquisitions, and disruptions to adjacent residential areas and to develop feasible, and effective mitigation measures to address the potentially significant impacts of the project, including noise and safety effects. See MR-3: Operational Noise Project Features and Mitigation Measures and MR-9: Light Rail Security. See MR-8: Light Rail and Freight Train Safety.

The Metro Board will not select the project based only on cost. Instead, the Board considers a range of factors, including technical analysis, environmental impacts, and community input. The Metro Board has selected an LPA for the purposes of the Final EIR, although it has not yet approved the project, including any of the options and alternatives evaluated in the Draft EIR. A final decision will not be made until after the Metro Board reviews the Final EIR, which will include responses to all public comments, including those of the commenter.

The width of the Metro ROW varies across the project area. Most segments measure 100 feet, but some are narrower (75 feet) or wider (over 150 feet). Metro conducted a property survey in Spring 2025 to verify Metro's property boundaries, the results of which are reflected in the Final EIR Appendix B, Select Advanced Conceptual Engineering Drawings - Locally Preferred Alternative. Throughout the entire corridor, the width of the Metro ROW is more than sufficient to meet design requirements for the project elements, including for tracks, retaining walls, soundwalls or other barriers, maintenance access areas, and sufficient clearance from freight. Metro has designed the project to avoid displacement of residents.

PH-121-2 Section 3.8-4.6 of the Draft EIR evaluates the potential for the project to be located on a geologic unit or soil that is unstable or that would become unstable as a result of the project. As described in 3.8-2.5 of the Draft EIR, the project includes Project Feature PF-GEO-1: Metro Geotechnical Design Standards, which requires preparation of site-specific geotechnical investigations, consistent with Metro's established design criteria. Based on the project as defined, including PF-GEO-1: Metro Geotechnical Standards, the Draft EIR concludes that this impact would be less than significant. Similarly, Section 3.8-4.7 of the Draft EIR evaluates whether the project to be located on expansive soil, as defined in California Building Code Section 1803.5.3, and whether it would create a substantial risk to life or property. The Draft EIR concludes that this impact would also be less than significant based on the full project description, which incorporates Project Feature PF-GEO-1: Metro Geotechnical Design Standards. Compliance with established engineering and safety criteria, as required by Project Feature PF-GEO-1: Metro Geotechnical Design Standards, would

ensure long-term structural stability and safety. See MR-13: Soil Stability and Sinkholes for additional information.

As discussed in Section 3.8-4.2 of the Draft EIR, using construction techniques like sloping or benching of excavation and shoring of trench walls with support would prevent any construction impacts like caving or soil instability. The following text has been added to Section 4.12, Corrections and Additions, of the Final EIR: "Shoring would be monitored for lateral and vertical movement during construction."

PH-121-3 The commenter's opposition to the Metro ROW alignment and support for the Hawthorne Option is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

PH-121-4 See response to Comment 121-2.

PH-121-5 As shown on page 3.6-53 of the Draft EIR, soundwalls are proposed along both the west and east sides of the Metro ROW. The soundwalls would begin immediately south of 182nd Street and continue to Hawthorne Boulevard for the Elevated/At-Grade Alignment and from 186th Street to Hawthorne Boulevard for the LPA and Trench Option. The noise analysis follows the Detailed Noise Analysis Procedure per the 2018 Federal Transit Administration (FTA) Transit Noise and Vibration Impact Assessment Manual. Consistent with this methodology, the assessment of soundwall effectiveness takes into consideration the height of the receptors, height of the soundwalls, and the distance of the receptor from the source and soundwall. Regarding reflective noise, the FTA methodology includes assumptions about sound reflections from barriers, such as soundwaves bouncing off non-absorptive (reflective) surfaces. Where the assessment determined that additional noise reduction was necessary to reduce noise levels to below the FTA noise impact criteria, absorptive noise barriers have been recommended.

PH-121-6 The commenter's support for the Hawthorne Option is noted. See MR-1: Selection of Alternatives. Ridership is discussed in the 2023 Ridership Summary Report, published alongside the Draft EIR. See MR-15: Metro Ridership Forecasting Methodology. Riders at the Redondo Beach Transit Center would also be able to access the South Bay Galleria and planned future development via a short walk or transit connection, and Metro would continue to assess opportunities for further enhancing connections as the design progresses.

Submission PH-122 Ray Hollar

PH-122-1 Section 3.6, Noise and Vibration, of the Draft EIR, carefully considered potential noise and vibration impacts on sensitive receptors, including Pacific Crest Cemetery, which is included as Cluster F1. As discussed in Section 3.6, the light rail transit vehicles would be slower at this location due to the approach and departure from the Redondo Beach Transit Center Station. The existing ambient noise level at Cluster F1 is approximately 60 a-weighted decibels (dBA), L_{eq}. The predicted noise level at Cluster F1 after implementation of mitigation would be approximately 55 dBA, L_{eq} during a typical hour, as shown on page 3.6-60 of the Draft EIR. While the maximum instantaneous noise level as the train passes at a speed of 35 miles per hour would be approximately 70 to 75 dBA, this temporary noise is

similar to existing conditions of the cemetery, which fronts Grant Avenue and Inglewood Avenue. To provide context, normal human speech at 3 feet is approximately 65 dBA, as shown in Figure 3.6-1 on page 3.6-2 of the Draft EIR. With mitigation measures implemented, noise levels would not exceed the Federal Transit Administration noise impact criteria, and the Draft EIR concluded that noise impacts to Cluster F1 would be less than significant with mitigation. See MR-3: Operational Noise Project Features and Mitigation Measures.

It should also be noted that the LPA would reduce all operational noise impacts to less than significant with mitigation. See MR-1: Selection of Alternatives.

Submission PH-123 Niki Negrete-Mitchell

PH-123-1 There is sufficient space for the proposed light rail, freight track, and soundwalls within the Metro ROW. See Appendix 2-A, Select Advanced Conceptual Engineering Drawings, of the Draft EIR and Appendix B, Select Advanced Conceptual Engineering Drawings - Locally Preferred Alternative, of the Final EIR for more details on the relocated freight and light rail tracks. See also MR-8: Light Rail and Freight Train Safety. Regarding reflective noise, the Federal Transit Administration (FTA) methodology includes assumptions about sound reflections from barriers, such as soundwaves bouncing off non-absorptive (reflective) surfaces. Where the assessment determined that additional noise reduction was necessary to reduce noise levels to below the FTA noise impact criteria, absorptive noise barriers have been recommended.

PH-123-2 Vibration is addressed in Section 3.6, Noise and Vibration, of the Draft EIR. The vibration levels from light rail operations would be significantly lower than those generated by freight trains, due to the lighter weight. The vibration analysis considered both light rail trains and relocated freight. Operational vibration annoyance impacts would be mitigated to less than significant with mitigation for the Metro ROW alignments and the Hawthorne Option. Mitigation measures include MM-VIB-4: Low Impact Frogs, MM-VIB-5: Resilient Fasteners, and MM-VIB-6: Ballast Mats. Vibration mitigation measures and locations where they would apply are included on pages 3.6-106 through 3.6-108 of the Draft EIR.

Submission PH-124 Jennifer Dodge

PH-124-1 As discussed on page ES-1 of the Draft EIR, the Elevated/At-Grade Alignment is referred to as the “Proposed Project” in the Draft EIR, because it is the alignment that has been historically studied and advanced for the extension of the C Line (Green) to the South Bay Region. In addition, for the purposes of CEQA, Metro must define one of the three evaluated alignments as the “proposed project;” however, this term does not convey any preference or recommendation. The Elevated/At-Grade Alignment, Trench Option, and Hawthorne Option were evaluated in the Draft EIR at equal levels of detail. Pursuant to Section 15126.6 of the CEQA Guidelines, the Draft EIR also considered a reasonable range of CEQA alternatives: the No Project Alternative, the High-Frequency Bus Alternative, and the 170th/182nd Grade-Separated Light Rail Transit Alternative (also referred to as the “Hybrid Alternative”). In May 2024, based on a range of factors, the Metro Board selected the Hybrid Alternative as LPA for the purposes of the Final EIR. The Metro Board has not yet approved the project and may approve any of the options or alternatives evaluated in the

Draft EIR, including the No Project Alternative. A final decision will not be made until after the Metro Board reviews the Final EIR, which includes responses to all public comments, including those of the commenter. See MR-1: Selection of Alternatives.

Submission PH-125 Zein Obagi

PH-125-1 The Executive Summary is intended to provide a high-level summary of the CEQA impact determinations and does not include detailed information about specific design elements or specific aspects of the existing setting with respect to individual environmental issue areas (e.g., geology and soils).

Section 3.8-2.3 of the Draft EIR defines the Resource Study Areas (RSAs) for geology, soils, and paleontological resources as the footprints of the Elevated/At-Grade Alignment, Trench Option, and Hawthorne Option. These footprints encompass the areas necessary to construct, operate, and maintain each alignment. Additional information about existing soil conditions is provided in Draft EIR section 3.8-3.

See MR-13: Soil Stability and Sinkholes for additional information.

PH-125-2 Metro staff recommended that the Metro Board select the LPA based on multiple factors, including the contents of the Draft EIR and public engagement. In May 2024, the Metro Board selected the Hybrid Alternative as the LPA. It has not yet approved the project, including any of the options and alternatives evaluated in the Draft EIR. A final decision will not be made until after the Metro Board reviews the Final EIR which includes responses to all public comments, including those of the commenter. See MR-1: Selection of Alternatives.

Submission PH-126 Doug Boswell

PH-126-1 The 2023 Ridership Summary Report, published alongside the Draft EIR, shows that the project is expected to generate between 11,500 to 15,600 daily transit trips (boardings). See MR-15: Metro Ridership Forecasting Methodology.

PH-126-2 Noise and vibration are addressed in Section 3.6, Noise and Vibration, and air quality is addressed in Section 3.4, Air Quality, of the Draft EIR. The Draft EIR considers the effects of both light-rail and the relocated freight tracks. The frequency of freight operations on the Metro ROW is determined by BNSF, subject to existing agreements and applicable regulatory constraints. Metro does not control the freight train schedule or operations but coordinates with BNSF to ensure continued safe and efficient use of the Metro ROW. The Draft EIR's analysis of freight train operations is based on existing operating patterns, developed in consultation with BNSF and based on observed conditions. While BNSF has the right to operate within the Metro ROW, any substantial increase in freight traffic would require major infrastructure modifications, scheduling adjustments, and regulatory approvals (e.g., from the Federal Railroad Administration (FRA) and the California Public Utilities Code (CPUC)) that are not reasonably foreseeable at this time. The project would replace freight tracks as needed, in kind, with newer tracks, but it would not increase track capacity. The demand for freight movement along this corridor has remained stable for years, and no changes to freight operation are anticipated.

PH-126-3 The commenter's support for the Hawthorne Option is noted. The Metro Board has selected an LPA for the purposes of the Final EIR. It has not yet approved the project, including any of the options and alternatives evaluated in the Draft EIR. A final decision will not be made until after the Metro Board reviews the Final EIR, which includes responses to all public comments, including those of the commenter. See MR-1: Selection of Alternatives.

Submission PH-127 Mary Smiley

PH-127-1 The commenter's support for the Metro ROW alignment is noted. See MR-1: Selection of Alternatives. Metro strives to complete projects on time and within estimated budgets. Contingency is considered in the development of cost and schedule. See MR-21: Cost Estimates and Schedule.

Submission PH-128 Ray Hollar

PH-128-1 The May 2024 Board Report, available to the public prior to the Metro Board meeting and reviewed by the Metro Board prior to selecting an LPA, included information on cost effectiveness and included cost/benefit information, including cost per annual new rider, cost per annual project trip, and cost per reduction in vehicle miles traveled (VMT). In all instances the Elevated/At-Grade Alignment performed the best of the light rail alignments on all metrics. The LPA performed second best on cost per annual new rider and cost per reduction in VMT and third best on cost per annual project trip. The Trench Option performed third best in cost per VMT reduction and the worst in cost per annual new rider and cost per annual project trip. The Hawthorne Option performed second best in cost per annual project trip, third best in cost per annual new rider, and the worst in cost per reduction in VMT.

The commenter refers to metrics in the 2018 Supplemental Alternatives Report, which included two methods to calculate cost per rider. One method was to calculate the total capital cost over projected new riders. The other was to use the Federal Transit Administration's (FTA's) formula for annualized cost per rider, which divides annualized capital costs and annual operating and maintenance costs by the total anticipated annual riders and consists of only the total ridership on the project alignment (including riders who may already use Metro Rail and other public transit). The results of the first method are included in the May 2024 Metro Board Report. Although the Hawthorne Option is anticipated to have the highest annual new ridership (based on the FTA's formula), it would have significantly higher capital costs, which results in a lower cost effectiveness ratio.

All alignment options would provide greenhouse gas emissions reductions as shown in Table 3.5-16 Proposed Project and Options GHG Emissions (2042) in Section 3.5, Greenhouse Gas Emissions, of the Draft EIR. Although the Hawthorne Option would provide a marginal benefit in greenhouse gas emissions reductions compared to the Elevated/At-Grade Alignment and Trench Option, this is not the only consideration in selection of the LPA, as noted above.

Regarding noise, with implementation of the mitigation measures identified in the EIR, operational noise and vibration impacts of the Trench Option, the Hawthorne Option and

the LPA would be reduced to less than significant levels with mitigation. See MR-3: Operational Noise Project Features and Mitigation Measures.

Submission PH-129 Corey Cardinal

PH-129-1 Potential air quality impacts are addressed in Section 3.4, Air Quality, of the Draft EIR, including dust control during construction. Compliance with Project Features PF-AQ-1: Tier 4 Engine Standards and PF-AQ-2: Dust Control Best Practices would ensure that construction activities comply with South Coast Air Quality Management District (SCAQMD) and Metro standards controlling emissions and dust. Operationally, the light rail vehicles would be powered by electricity and would not produce localized emissions. The air quality analysis disclosed in the Draft EIR includes an assessment of localized emissions that would be generated from construction sites, which accounted for dust that would be generated. The localized air quality impacts were found to be less than significant when compared to the applicable SCAQMD thresholds, which were set at levels to prevent the occurrence of substantial dust concentrations reaching sensitive receptors that could cause adverse health effects. The localized impacts analysis used the most conservative receptor distance to be as protective as possible of the health of nearby residents. Thus, the analysis of dust emissions in the Draft EIR is adequate. Regional air quality would improve with implementation of the project due to a shift from passenger vehicles to light rail in the corridor. The potential for LPA impacts is addressed in Chapter 4, Evaluation of Alternatives, of the Draft EIR. See MR-4: Potential Negative Health Effects Related to Noise, Vibration, and Air Quality.

PH-129-2 Impacts related to drainage patterns alterations are addressed in Section 3.10, Hydrology and Water Quality, of the Draft EIR. As discussed in Section 3.10-4.3 of the Draft EIR, each of the alignment options studied in the Draft EIR, would increase impervious surfaces compared to existing conditions. However, most of the stormwater runoff would be retained within the project footprint, through an integrated low-impact development (LID) drainage system. This system would be designed to accommodate the stormwater quality design in volume, consistent with the Municipal Separate Storm Sewer System (MS4) Permit requirements established by the Los Angeles Regional Water Quality Control Board (LARWQCB). This system would minimize the potential for flooding both on-site and off-site, including in sumps. Maintenance of drainage infrastructure would also comply with applicable regulatory requirements to ensure long-term functionality.

As discussed in Chapter 4, Evaluation of Alternatives, in the Draft EIR, Section 4.5-3.10, the hydrology and water quality impacts of the LPA would be less than those analyzed in the Draft EIR for the Trench Option based on requiring less excavation. The potential impacts would be less than significant because the LPA would also include stormwater retention systems consistent with regional LID requirements.

PH-129-3 CEQA does not require an analysis of safety in terms of crime, as it is not an environmental issue, and therefore the Draft EIR does not make any conclusions regarding this topic. However, safety is a top priority for Metro. Metro Homeless Outreach Teams are deployed on Metro buses, trains, and stations to engage with unhoused riders and connect them to resources. See MR-9: Light Rail Security and MR-18: Homelessness.

PH-129-4 Ballast mats are proposed to reduce noise and vibration and consist of a rubber or other type of elastomer pad that is placed under the ballast. In general, the mat must be placed on a concrete pad to be effective. Installation of the ballast mats would not have any secondary detrimental effects to the environment. The materials are engineered for durability and have been extensively used in transit systems, including throughout the Metro system, without adverse environmental effects. Based on their track record of use and compliance with regulatory requirements, no significant impact to the environment is anticipated from the installation or use of ballast mats.

PH-129-5 As discussed in Section 3.8, Geology and Soils, of the Draft EIR, per Project Feature PF-GEO-1: Metro Geotechnical Design Standards, the project design process would include thorough site-specific geotechnical investigations to address foundation and ensure the stability of nearby structures. The investigation would identify soil conditions and include engineering and construction recommendations to ensure surrounding structures are not damaged and remain safe and structurally sound. See MR-13: Soil Stability and Sinkholes.

The comment is not clear regarding the concern related to airports. As stated on page 3.9-47 of the Draft EIR, the project is not within an airport land use plan or within two miles of any airport. Therefore, the project would have no impact related to safety hazards associated with a public airport or public use airport during construction or operation. See response to Comment PH-129-1 related to air quality concerns.

Submission PH-130 Lisa Francis

PH-130-1 The commenter's support for the Hawthorne Option is noted. See MR-1: Selection of Alternatives. Section 3.6, Noise and Vibration, of the Draft EIR, provides a comprehensive analysis of potential noise impacts associated with construction and operation of the Elevated/At-Grade Alignment, the Trench Option, and the Hawthorne Option. In addition, Chapter 4, Evaluation of Alternatives, of the Draft EIR, also evaluates the No Project Alternative, and the LPA. Operational noise and vibration impacts of the Trench Option, the Hawthorne Option and the LPA would be reduced to less than significant levels with mitigation. See MR-3: Operational Noise Project Features and Mitigation Measures.

PH-130-2 Metro understands concerns regarding property values. However, under CEQA, economic impacts such as changes in property values are not considered environmental impacts. The Draft EIR focuses on physical environmental impacts and measures to mitigate them, as required by CEQA. To address questions and concerns on property values, Metro has prepared more information. See MR-14: Property Values and Impacts to Businesses. Also see MR-10: Changes to Community Character.

Submission PH-131 Ted Hofmann

PH-131-1 In order to provide every commenter with an opportunity to express their opinions, a one-minute time limit was allocated at public hearings. The public has several other avenues to express their comments, including through the project email, letters, and the project phone number.

CEQA requires analysis of a reasonable range of alternatives to the project that would have the potential to meet most project objectives while avoiding or substantially reducing any of the significant impacts of the project. Public outreach events and materials focused on the Elevated/At-Grade Alignment and Options under study, although, details on all the CEQA alternatives can be found in the Draft EIR and were presented to the Metro Board for consideration.

CEQA requires that an EIR identify the Environmentally Superior Alternative, which is the alternative that would be expected to generate the fewest adverse impacts. However, the Lead Agency is not obligated to select the Environmentally Superior Alternative. See MR-1: Selection of Alternatives. The Metro Board has selected an LPA for the purposes of the Final EIR, although it has not approved the project, including any of the options and alternatives evaluated in the Draft EIR. A final decision will not be made until after the Metro Board reviews the Final EIR, which includes responses to all public comments, including those of the commenter.

Submission PH-132 Doris Hofmann

PH-132-1 The commenter's opposition to a Metro rail project, and support for the High-Frequency Bus Alternative, is noted. The High-Frequency Bus Alternative is analyzed in Chapter 4, Evaluation of Alternatives, of the Draft EIR. See MR-1: Selection of Alternatives and See MR-16: Response to Lawndale and Redondo Beach Community Letter.

Ridership projections are discussed in the 2023 Ridership Summary Report, published alongside the Draft EIR. See MR-15: Metro Ridership Forecasting Methodology.

Section 3.6, Noise and Vibration, of the Draft EIR, provides a comprehensive analysis of potential noise impacts associated with construction and operation of the Elevated/At-Grade Alignment, the Trench Option, and the Hawthorne Option. In addition, Chapter 4, Evaluation of Alternatives, of the Draft EIR, evaluates the No Project Alternative, High Frequency Bus Alternative, and the LPA. Operational noise and vibration impacts of the Trench Option, the Hawthorne Option and the LPA would be reduced to less than significant levels with mitigation. See MR-3: Operational Noise Project Features and Mitigation Measures.

As explained on page 3.1-3 of the Draft EIR, traffic delay (often measured by level of service) is no longer permissible as a CEQA impact criterion and therefore this analysis and related topics are not addressed in the Draft EIR. See MR-11: Traffic Delay and Level-of-Service and the 2023 Transportation Detail Report, published concurrently with the Draft EIR, for a discussion of traffic conditions. The LPA and Trench Option would fully grade separate light rail from all roadways, and would not increase vehicle delay compared to existing conditions. The Hawthorne Option would also be fully grade-separated.

Submission PH-133 Michael Kim

PH-133-1 The commenter's opposition to the Metro ROW alignments is noted. The frequency of freight operations on the Metro ROW is determined by BNSF, subject to existing agreements and applicable regulatory constraints. Metro does not control the freight train schedule or

operations but coordinates with BNSF to ensure continued safe and efficient use of the Metro ROW. The Draft EIR's analysis of freight train operations is based on existing operating patterns, developed in consultation with BNSF and based on observed conditions. While BNSF has the right to operate within the Metro ROW, any substantial increase in freight traffic would require major infrastructure modifications, scheduling adjustments, and regulatory approvals (e.g., from the Federal Railroad Administration (FRA) and the California Public Utilities Code (CPUC)) that are not reasonably foreseeable at this time. The project would replace freight tracks as needed, in kind, with newer tracks, but it would not increase track capacity. The demand for freight movement along this corridor has remained stable for years, and no changes to freight operation are anticipated.

Submission PH-134 Glen Brackenridge

PH-134-1 The commenter's support for the Hawthorne Option is noted. See MR-1: Selection of Alternatives. Ridership is discussed in the 2023 Ridership Summary Report, published alongside the Draft EIR. See MR-15: Metro Ridership Forecasting Methodology. The project would connect the two new city transit centers in Redondo Beach and Torrance to the Metro rail network.

PH-134-2 Metro understands concerns regarding property values. However, under CEQA, economic impacts such as changes in property values are not considered environmental impacts. The Draft EIR focuses on physical environmental impacts and measures. To address questions and concerns on property values, Metro has prepared more information. See MR-14: Property Values and Impacts to Businesses.

PH-134-3 Existing noise levels both along the Metro ROW and Hawthorne Boulevard are shown beginning on page 3.6-22 of the Draft EIR. These monitored noise levels reflect full 24-hour monitoring and accurately portray the existing conditions for the alignments, including rush hour, non-rush hour, and freight rail activities. The analysis follows Federal Transit Administration (FTA) methodology, which uses day-night average noise levels to capture overall ambient conditions, including quiet periods when the freight trains are not present. Monitored noise levels along Hawthorne Boulevard typically had a higher ambient noise level due to roadway traffic. However, residential neighborhoods set back from Hawthorne Boulevard had similar noise levels as to those recorded in neighborhoods along the Metro ROW, which accounted for freight rail noise. See page 3.6-23 for noise measured ambient noise levels at each noise monitoring location.

Submission PH-135 Sirley Cuevas

PH-135-1 Metro shared all comments made on the Draft EIR, as well as records of previous engagement, with the Metro Board to help inform their decision-making process. In May 2024, the Metro Board selected an LPA for the purposes of the Final EIR. However, it has not yet approved the project, including any of the options and alternatives evaluated in the Draft EIR. A final decision will not be made until after the Metro Board reviews the Final EIR, which includes responses to all public comments, including those of the commenter. The decision will also consider comments from the community and environmental impacts, including those to air quality. As disclosed in the Draft EIR, only the Trench Option would result in a significant and unavoidable air quality impact, which would occur during

construction; none of the other alignment options or alternatives would result in significant impacts to air quality.

Submission PH-136 Laura Thomas

PH-136-1 CEQA does not require an analysis of safety in terms of crime, as it is not an environmental issue, and therefore the Draft EIR does not make any conclusions regarding this topic. Metro takes the safety and well-being of nearby communities very seriously. See MR-9: Light Rail Security.

PH-136-2 The 2023 Ridership Summary Report, published alongside the Draft EIR, shows that the project is expected to generate between 11,500 to 15,600 daily transit trips (boardings). The project would connect the City of Lawndale to two new city transit centers in Redondo Beach and Torrance, providing expanded access to Los Angeles County through the Metro rail network. See MR-15: Metro Ridership Forecasting Methodology.

Submission PH-137 John Richards

PH-137-1 The commenter's opposition to a rail project and preference for buses is noted. See MR-1: Selection of Alternatives. Chapter 4, Evaluation of Alternatives, in Draft EIR analyzes a High-Frequency Bus Alternative. Ridership projections are discussed in the 2023 Ridership Summary Report, published alongside the Draft EIR. See MR-15: Metro Ridership Forecasting Methodology.

The project has secured funding from Measure R (2008), Measure M (2016), Transit and Intercity Rail Capital Program (TIRCP) Grant from the California State Transportation Agency, and 3% match contributions from local jurisdictions. Metro would continue to explore funding opportunities for the project.

The project would travel through three cities: Lawndale, Redondo Beach and Torrance. Metro has been exploring options for transit service along the Metro ROW for several decades. Metro purchased the Harbor Subdivision from the precursor to the BNSF in the early 1990s. In 2009, Metro prepared an alternatives analysis that studied the potential for transit service along all or portions of the Metro ROW that identified the segment between the Redondo Beach (Marine) Station and the Torrance Transit Center as a high-priority corridor. Since then, several alignments and alternatives have been studied. The 2018 Supplemental Alternatives Analysis report recommended two alignments to be carried forward into environmental analysis: the Metro ROW and the Hawthorne Boulevard alignment (both primarily at-grade alignments). Since then, Metro has considered grade-separated light rail, including the Trench Option, Hawthorne Option, and LPA. See MR-15: Metro Ridership Forecasting Methodology.

The underground subway being constructed on Wilshire Boulevard, referenced by the commenter, is the Metro D Line Subway Extension. The Wilshire corridor is among the busiest in the country, with extremely high transit and traffic demand and limited surface right-of-way. By contrast, the Metro ROW is an existing rail corridor and does not meet the same thresholds that would necessitate a fully underground subway.

Submission PH-138 Holly Osborne

PH-138-1 The Draft EIR, using aerial imagery, identified seven structures along the west side of the Metro ROW between Grant Avenue and Artesia Boulevard that could be subject to groundborne vibration damage during construction of the Elevated/At Grade Alignment. Breakwater Village, a senior living community adjacent to the Metro ROW, appears to have one structure that is immediately adjacent to the rail corridor. The other buildings in the development front Ruxton Lane and are set back farther from the Metro ROW. It is important to note that only the structure physically adjacent to the Metro ROW was identified as potentially affected in the analysis. For that structure, there is approximately 400-feet of frontage along the corridor. Two points along the building frontage were analyzed to ensure that vibration levels were adequately evaluated along its length. Regardless of the number of dwelling units with a structure, the vibration analysis in the Draft EIR focused on the potential for structural damage to the building, consistent with the Federal Transit Administration (FTA) Transit Noise and Vibration Impact Assessment Manual (FTA, 2018). The analysis evaluates vibration levels at representative building facades and applies thresholds based on structural criteria, not on individual unit count. Therefore, the conclusions of the Draft EIR remain valid. This approach was applied consistently throughout the corridor.

Submission PH-139 Ted Hofmann

PH-139-1 The property mentioned by the commenter is located along the Hawthorne Option, which would require an aerial (overhead) easement for the elevated light rail structure to cross a portion of the property. Metro has designed the project to avoid displacement of residents. The maps referenced are from the 2023 Real Estate Acquisitions Report, published concurrently with the Draft EIR.

In May 2024, the Metro Board selected the Hybrid Alternative as the LPA, which travels along the Metro ROW and would not affect the property mentioned. However, if the Metro Board approved the Hawthorne Option as the final project as part of the certification of the Final EIR, Metro would follow the standard property appraisal and compensation procedures to determine fair market value and just compensation for the overhead easement area. The easement process would comply with the California Relocation Act, as applicable. Affected property owners would be contacted in advance and provided with information regarding the easement and their rights.

PH-139-2 The Measure M Expenditure Plan, passed in 2016 by over 70% of Los Angeles County voters, includes a variety of transportation projects, one of which was this light rail project extending the C Line (Green) to Torrance.

Submission PH-140 G.P. Sudduth

PH-140-1 The commenter's support for the Hawthorne Option is noted. See MR-1: Selection of Alternatives. As part of the 2018 Supplemental Alternatives Analysis, Metro studied stations in the City of Lawndale between Inglewood Avenue and Manhattan Beach Boulevard along

the Metro ROW and at Hawthorne Boulevard/166th Street. At the request of the City of Lawndale, Metro removed these proposed stations from further study.

Submission PH-141 John Schreiber

PH-141-1 While change in community character does not constitute a significant impact under CEQA, Section 3.2, Land Use, of the Draft EIR, analyzes the project's potential to physically divide communities and concludes that impacts would result in less than significant. Pedestrians would still be able cross the Metro ROW at all existing designated rail crossings: Inglewood Avenue, Manhattan Beach Boulevard, 159th, 160th, 161st, 162nd, 170th, and 182nd Streets. Land uses would not be altered so as to isolate any one part of the community from the other. Retaining walls would be required to transition the light rail guideway from elevated to at-grade, but they would not block any crossings. The LPA and Trench Option would fully grade separate light rail from all roadways along the Metro ROW. The Hawthorne Option would likewise be fully grade-separated. MR-10: Changes to Community Character.

PH-141-2 As discussed in Section 3.2, Land Use and Planning, and Section 3.3, Aesthetics, of the Draft EIR, while the Metro ROW alignments would cause visual changes in the community, the same access across the Metro ROW as designated today would be maintained, and structures would not completely block views to the other side of the community (see Figures 3.3-62 and 3.3-63 of the Draft EIR, where the opposite side of the Metro ROW is both visible and accessible).

PH-141-3 Light rail noise was assessed based on the anticipated frequency of trips during the different hours of operation. See MR-2: Operational Noise Analysis Methodology and Impact Thresholds.

Section 3.6, Noise and Vibration, of the Draft EIR, evaluates potential noise impacts, including those from wheel squeal. According to the Federal Transit Administration (FTA) Transit Noise and Vibration Impact Assessment Manual (2018), curves with a radius greater than 1,000 feet do not generate wheel squeal. As a result, the FTA recommends designing transit projects to avoid tight curves with radii of less than 1,000 feet to mitigate potential noise impacts. The Elevated/At-Grade Alignment, Trench Option, and the LPA do not include curves with radii less than 1,000 feet, which are the primary cause of wheel squeal. Consequently, wheel squeal is not anticipated under these design conditions.

The Hawthorne Option includes two curves which could potentially produce wheel squeal. Mitigation Measure MM-NOI-5: Wheel Squeal Noise Monitoring would require noise monitoring to identify wheel squeal at two curves with a radius less than 1,000 feet for the Hawthorne Option:

> Curve between Santa Fe Avenue and Inglewood Avenue

> Curve between 161st Street and 163rd Street

If wheel squeal is identified, Metro shall install wayside rail lubrication to ensure wheel squeal does not occur. Rail lubrication is discussed in the FTA Transit Noise and Vibration Impact Assessment Manual (2018) as a valid method for mitigating noise.

Submission PH-142 Catherine Boll

PH-142-1 The commenter's support for the Hawthorne Option is noted. See MR-1: Selection of Alternatives. Metro has worked diligently to develop feasible and effective mitigation measures to address the potentially significant impacts of the project.

Light rail vehicles are quieter, electrically powered trains that generate less noise compared to larger, diesel operated Metrolink trains. Noise and vibration impacts are addressed in Section 3.6, Noise and Vibration, of the Draft EIR. See MR-3: Operational Noise Project Features and Mitigation Measures. The Metro ROW alignment, the Trench Option, and the LPA would include upgrades to existing freight crossings, allowing for the establishment of a Federal Railroad Administration quiet zone. This would eliminate routine freight train horn noise along the Metro ROW in the area.

PH-142-2 As described in Section 3.6, Noise and Vibration, of the Draft EIR, a Mitigation Measure MM-NOI-1: Noise Control Plan would be implemented as mitigation for construction noise impacts, which would require Metro's contractor to prepare and implement a detailed, site-specific Noise Control Plan that demonstrates compliance with the Federal Transit Administration's (FTA's) construction noise thresholds. To ensure impacts are reduced to the maximum extent feasible, MM-NOI-1: Noise Control Plan would require the contractor to conduct continuous noise monitoring and to implement corrective actions if thresholds are exceeded. As described in Section 3.9, Hazards and Hazardous Materials, of the Draft EIR, debris and waste generated during construction would be properly transported away and disposed of in accordance with federal and State regulations.

PH-142-3 See response to Comment 142-1.

Submission PH-143 John Richards

PH-143-1 The 2023 Ridership Summary Report, published alongside the Draft EIR, shows that the project is expected to generate between 11,500 to 15,600 daily transit trips (boardings). See MR-15: Metro Ridership Forecasting Methodology.

PH-143-2 The commenter's opposition to a train in Lawndale and support for buses is noted. A High-Frequency Bus Alternative is analyzed in Chapter 4, Evaluation of Alternatives, of the Draft EIR. See MR-1: Selection of Alternatives.

Submission PH-144 Joanne Doram

PH-144-1 Metro has undertaken extensive community outreach for potential transit service along all or portions of the Metro ROW for well over a decade. Metro's outreach program also accommodates the needs of residents with limited English proficiency. Most recently, in advance of the Metro Board of Director's selection of the LPA in May 2024, Metro distributed 32,000 postcards to residents, property owners, and businesses within a one-mile radius of all alignments under study. Additionally, at the request of the City of Lawndale, Metro sent flyers to every resident within Lawndale. All outreach notifications are provided in both English and Spanish. Documentation on the outreach conducted during the

environmental review process is available on the Metro project Dropbox, by visiting metro.net/clineext/#documents.

The Metro Board of Directors, not the public, votes on the approval of regional transit projects. The Measure M Expenditure Plan, passed in 2016 by over 70% of Los Angeles County voters, includes a variety of transportation projects, one of which was this light rail project extending the C Line (Green) to Torrance. The Metro Board has selected an LPA for purposes of the Final EIR, although it has not yet approved the project, including any of the options and alternatives evaluated in the Draft EIR. A final decision will not be made until after the Metro Board reviews the Final EIR, which includes responses to all public comments, including those of the commenter. See MR-1: Selection of Alternatives.

Submission PH-145 Corey Cardinal

PH-145-1 The commenter's concerns are noted. Metro has undertaken extensive community outreach for the project, see response PH-144-1. The estimated capital cost would be to construct the project. See MR-14: Property Values and Impacts to Businesses.

Submission PH-146 Massima Daroui

PH-146-1 The 2023 Ridership Summary Report, published alongside the Draft EIR, shows that the project is expected to generate between 11,500 to 15,600 daily transit trips (boardings). See MR-15: Metro Ridership Forecasting Methodology.

PH-146-2 The Measure M Expenditure Plan, passed in 2016 by over 70% of Los Angeles County voters includes funding for a variety of transportation projects, one of which was this light rail project extending the C Line (Green) to Torrance. Although Metro owns the Metro ROW, BNSF operates and maintains the freight tracks in the City of Lawndale. As part of this project, Metro would relocate and rebuild the freight tracks as needed, to accommodate the light rail extension.

PH-146-3 The commenter's opposition to the Metro ROW alignments, and support for the Hawthorne Option and High-Frequency Bus Alternative, is noted. All comments have been shared with the Metro Board for their consideration. See MR-1: Selection of Alternatives.

Submission PH-147 Terri Thomas

PH-147-1 The commenter's opposition to a rail project and support for an effective bus station on Hawthorne Boulevard is noted. A High-Frequency Bus Alternative is evaluated in Chapter 4, Evaluation of Alternatives, of the Draft EIR. See MR-1: Selection of Alternatives. The 2023 Ridership Report, published concurrently with the Draft EIR, shows that the project would generate between 11,500 to 15,600 daily transit trips (boardings). See MR-15: Metro Ridership Forecasting Methodology. In 2022, Metro adopted a Metro Tree Policy which outlines Metro's commitment to protecting trees, when possible, and replacing those that must be removed as a result of Metro construction and maintenance. For non-heritage trees, the policy specifies a replacement ratio of two trees for every tree removed. For the alignments along the Metro ROW, the project would include two new multi-use paths

along the Metro ROW (between 159th Street and Condon and 170th 182nd Streets). See MR-10: Changes to Community Character.

Submission PH-148 Craig St. John

PH-148-1 The commenter's opposition to the project is noted. All project options and alternatives were planned to minimize conflicts with the California Department of Transportation (Caltrans). However, Metro does not have authority over Caltrans or its potential future projects. Metro would continue to coordinate with Caltrans as this project progresses. The Metro Board selected as the LPA for the purposes of the Final EIR, is located within the Metro ROW and would avoid potential conflict on Hawthorne Boulevard. See MR-1: Selection of Alternatives.

PH-148-2 Section 3.6. Noise and Vibration, of the Draft EIR, discloses that each alignment option would result in a potentially significant construction-related noise impact. To address this impact, the project would implement Mitigation Measure MM NOI-1: Noise Control Plan. While implementation of this measure requires compliance with the FTA's 1-hour equivalent noise level (Leq) noise thresholds and includes continuous noise monitoring and corrective actions, the Draft EIR acknowledges that temporary exceedances may still occur. For this reason, construction noise impacts are identified as significant and unavoidable. Such impacts would be temporary and would cease upon the completion of construction activities.

Regarding construction traffic impacts, as described in Section 3.1, Transportation, of the Draft EIR, the project includes Project Feature PF-T-1: Construction Traffic Management Plan, which would be submitted to the local cities and include measures manage construction-related traffic, such as establishing detour routes, providing advance notice and signage, maintaining access for residents, businesses, and emergency services, and scheduling deliveries and pick-ups during non-peak hours.

PH-148-3 Metro has not conducted an economic impact study for the project. Potential economic effects, such as reductions in property values and loss of property tax revenues, do not in and of themselves constitute effects on the physical environment, and therefore the Draft EIR does not reach conclusions on those issues. Rather, the Draft EIR focuses on physical environmental impacts and measures to mitigate them, as required by CEQA. However, Metro's goal is to help businesses continue to thrive throughout construction and post construction. See MR-14: Property Values and Impacts to Businesses for more information on the resources for businesses impacted by Metro's project due to construction and post construction.

Submission PH-149 Holly Osborne

PH-149-1 The noise analysis in the Draft EIR follows the Federal Transit Administration (FTA) Transit Noise and Vibration Impact Assessment Manual (2018), which specifies the use of 24-hour time-averaged noise levels to assess the ambient noise environment. These levels capture all sound sources, including the occasional freight train pass-by, as part of the existing baseline. The analysis also incorporates a 10-dBA (a-weighted decibel) penalty for all sound occurring during the nighttime hours (10:00 p.m. to 7:00 a.m.) to account for increased

sensitivity to noise during these hours. The effect of the penalty is that in the calculation of 24-hour noise, any event that occurs during the nighttime hours, is equivalent to 10 of the same events during the daytime hours. This ensures the assessment reflects the potential for greater disturbance from nighttime noise events. See MR-2: Operational Noise Analysis Methodology and Impact Thresholds.

Although noise from freight trains is loud and increases the 24-hour average noise levels, its infrequent occurrence during the day means that it does not dominate or skew the overall noise profile. Excluding the freight noise from the existing ambient noise conditions would not comply with FTA methodology and would misrepresent the true ambient noise environment. The 24-hour noise measurements include both periods when the freight is not operating and periods when freight is operating.

Metro follows Federal Transit Administration guidance which is a United States agency. It is unclear what the referenced Canadian methodology is, which may not be appropriate for a project being implemented in the United States.

Submission PH-150 Rose Rodriguez

PH-150-1 The commenter's opposition to the Metro ROW alignments is noted. See MR-1: Selection of Alternatives; and MR-10: Changes to Community Character; and MR-16: Response to Lawndale and Redondo Beach Community Letter.

PH-150-2 The presence of natural gas lines and petroleum pipelines, their potential impacts, and applicable regulatory requirements are addressed in Sections 3.9, Hazards and Hazardous Materials, and 3.11 Utilities and Service System, of the Draft EIR. Potential impacts of the LPA in this context are evaluated in Chapter 4, Evaluation of Alternatives, of the Draft EIR. In addition, Section 4.13, Corrections and Additions, of the Final EIR expands on the analysis in Section 3.9-4.2.1 of the Draft EIR by clarifying the protocols, construction techniques, regulations, and standards with which the project would comply. As detailed therein, the revisions do not change the Draft EIR's conclusion that the impact related to oil and gas pipelines would be less than significant. See MR-7: Utility Relocation and Hazardous Materials Safety. See MR-8: Light Rail and Freight Train Safety. The commenter's opposition to light rail train pass-bys is noted.

PH-150-3 As discussed in Section 3.2, Land Use and Planning, of the Draft EIR, the project would not physically divide a community because residents would still be able cross the Metro ROW at all existing designated rail crossings: Inglewood Avenue, Manhattan Beach Boulevard, 159th, 160th, 161st, 162nd, 170th, and 182nd Streets. Land uses would not be altered so as to isolate any one part of the community from the other. The use of the Metro ROW as recreational space is acknowledged on page 3.15-38 of the Draft EIR. While Metro recognizes that some residents currently use the Metro ROW as informal recreational space, it is important to note that the Metro ROW is not a designated park or public recreational area. Its primary purpose is rail transportation, and access is not authorized. The LPA includes two new multiuse paths, expanding access to residential neighborhoods and offering additional recreational options. See MR-10: Changes to Community Character and MR-16: Response to Lawndale and Redondo Beach Community Letter.

Per CEQA and the CEQA Guidelines, Metro is conducting environmental analysis to disclose the potential impacts of the project and identify feasible mitigation measures or alternatives to reduce significant impacts. The EIR and associated approval process is not a waiver. An EIR is the most detailed level of environmental approval under CEQA. The Metro Board has selected an LPA for the purposes of the Final EIR. It has not yet approved the project, including any of the options and alternatives evaluated in the Draft EIR. A final decision will not be made until after the Metro Board reviews the Final EIR, which includes responses to all public comments, including those of the commenter.

PH-150-4 Metro is the CEQA lead agency for this project. This requires Metro to take responsibility for preparing the appropriate CEQA document for the project.

Submission PH-151 Ray Hollar

PH-151-1 The commenter's opposition to the Metro ROW alignment and support for the No Build Alternative is noted. See MR-1: Selection of Alternatives. CEQA does not require funding to be demonstrated in a Draft EIR. However, the May 2024 Board Report, which was made available to the public prior to the Metro Board meeting and reviewed by the Board prior to selecting an LPA, included estimates of anticipated funding from identified sources, projected shortfalls, and potential additional sources. It also included cost-benefit analysis information, including cost per annual new rider, cost per all annual trips, and cost per reduction in vehicle miles traveled (VMT). The 2018 Supplemental Alternatives Report described similar methods for calculating cost per rider. It is unclear how the commenter derived their cost per rider figure.

Submission PH-152 G.P. Sudduth

PH-152-1 Metro understands concerns regarding property values. However, under CEQA, economic impacts such as changes in property values are not considered environmental impacts. The Draft EIR focuses on physical environmental impacts and measures to mitigate them, as required by CEQA. To address questions and concerns on property values, Metro has prepared more information. See MR-14: Property Values and Impacts to Businesses.

PH-152-2 Section 3.6, Noise and Vibration, of the Draft EIR, provides a detailed analysis of noise and vibration impacts based on the Federal Transit Administration Transit Noise and Vibration Assessment Manual. See MR-2: Operational Noise Analysis Methodology and Impact Thresholds.

PH-152-3 A High-Frequency Bus Alternative is analyzed in Chapter 4, Evaluation of Alternatives, of the Draft EIR. Proposed bus stops for the High-Frequency Bus Alternative are located at existing on-road stops, such as the one at Artesia Boulevard and Hawthorne Boulevard to maximize travel time savings by avoiding deviations from arterials. This strategy is intended to improve efficiency for bus riders by maintaining a direct route. Light rail does not have the same constraints as bus. The proposed light rail stations are strategically placed to optimize connectivity and serve key transit hubs, including the Torrance Transit Center, to provide greater access for riders.

Submission PH-153 Michael Kim

PH-153-1 Metro plans, operates, and coordinates funding for most of the public transportation system in Los Angeles County. It does not operate or profit from freight rail operations. The project would not add new freight rail capacity to the Metro ROW. The frequency of freight operations on the Metro ROW is determined by BNSF, subject to existing agreements and applicable regulatory constraints. Metro does not control the freight train schedule or operations but coordinates with BNSF to ensure continued safe and efficient use of the Metro ROW. The Draft EIR analysis of freight train operations is based on existing operating patterns, developed in consultation with BNSF and based on observed conditions. While BNSF has the right to operate within the Metro ROW, any substantial increase in freight traffic would require major infrastructure modifications, scheduling adjustments, and regulatory approvals (e.g., from the Federal Railroad Administration (FRA) and the California Public Utilities Code (CPUC)) that are not reasonably foreseeable at this time. The project would replace freight tracks as needed, in kind, with newer tracks, but it would not increase track capacity. The demand for freight movement along this corridor has remained stable for years, and no changes to freight operation are anticipated.

PH-153-2 As described in Section 3.1, Transportation, of the Draft EIR, on page 3.1-15, Project Feature PF-T-1: Construction Traffic Management Plan (CTMP), a CTMP would be prepared and implemented to manage disruptions during construction. The plan would include strategies to manage traffic flow, including phased construction to avoid long-term closures, clearly marked detours, and coordination with local agencies to ensure efficient traffic management. As part of Metro's standard practice, the CTMP would explore scheduling certain construction activities, including deliveries and pick-ups of materials, during non-peak travel periods, and the possibility of conducting some construction work at night. The CTMP would be updated as construction progresses to reflect changes and updates at the work areas.

PH-153-3 The project would not add new freight rail capacity to the Metro ROW, as discussed in response to Comment PH-153-1. All at-grade crossings for light rail and/or freight would include upgraded safety crossing infrastructure. The LPA, Trench Option and Hawthorne Option would fully grade separate light rail from roadways. Metro takes the safety and well-being of nearby communities very seriously. See MR-8: Light Rail and Freight Train Safety.

Submission PH-154 Doris Hofmann

PH-154-1 The commenter's opposition to the project is noted. This project is partially funded by Measure R, as well as Measure M, another ballot measure passed by over 70% of voters in Los Angeles County to fund mobility projects. Additional funding includes a Transit and Intercity Rail Capital Program (TIRCP) Grant from the California State Transportation Agency (CALSTA) and 3% match contributions from local jurisdictions. Metro would continue to explore funding opportunities for the project. The project would provide multiple benefits to the City of Lawndale, including improving mobility in the South Bay and providing equitable access to regional destinations through improved connections to the Metro regional rail system. Stations in the City of Lawndale were proposed as part of the 2018 Supplemental Alternatives Analysis, but were removed from consideration at the request of the City of Lawndale.

PH-154-2 The project would provide multiple benefits to the City of Lawndale, including improving mobility in the South Bay and providing equitable access to regional destinations through improved connections to the Metro regional rail system. Metro has undertaken extensive community outreach for potential transit service along all or portions of the Metro ROW for well over a decade. Metro's outreach program also accommodates the needs of residents with limited English proficiency. In advance of the Metro Board of Director's selection of the LPA in May 2024, Metro distributed 32,000 postcards to residents, property owners, and businesses within a one-mile radius of all alignments under study. Additionally, at the request of the City of Lawndale, Metro sent flyers to every resident within Lawndale. All public meeting materials and outreach notification have been provided in English and Spanish. Documentation on the outreach conducted during the environmental review process is available on the Metro project Dropbox, by visiting metro.net/clineext/#documents.

Submission PH-155 Rose Rodriguez

PH-155-1 The commenter's support for buses instead of rail is noted. A High-Frequency Bus Alternative is analyzed in Chapter 4, Evaluation of Alternatives, of the Draft EIR. Proposed bus stops for the High-Frequency Bus Alternative are located at existing bus stops, such as the one at Artesia Boulevard and Hawthorne Boulevard to maximize travel time savings by avoiding deviations from arterials. This strategy is intended to improve efficiency for bus riders by maintaining a direct route. Light rail does not have the same constraint as bus. The proposed light rail stations are strategically placed to optimize connectivity and serve key transit hubs, including the Torrance Transit Center, to provide greater access for riders. The proposed stations would serve as key transit hubs, with existing local bus routes providing access to nearby destinations. While Metro assists in identifying improvements during the planning and design phases, the implementation of local access to regional transit facilities falls under the jurisdiction of the local cities. If the project is approved, Metro would coordinate with the local jurisdictions to assist in this planning.

The 2023 Ridership Summary Report, published alongside the Draft EIR, shows that the project is expected to generate between 11,500 to 15,600 daily transit trips (boardings). See MR-15: Metro Ridership Forecasting Methodology.

Metro has worked diligently to develop feasible and effective mitigation measures to address the potentially significant impacts of the project.

PH-155-2 The potential operational noise impacts for the Elevated/At-Grade Alignment, the Trench Option, and the Hawthorne Option are addressed in Section 3.6, Noise and Vibration, of the Draft EIR. The potential for LPA impacts is addressed Chapter 4, Evaluation of Alternatives, of the Draft EIR. See MR-2: Operational Noise Analysis Methodology and Impact Thresholds and MR-3: Operational Noise Project Features and Mitigation Measures. Also see MR-19: Project Benefits, which details how the project is consistent with Metro's Equity Platform.

PH-155-3 The comment does not address the adequacy of the Draft EIR and is noted for the record. All comments have been shared with the Metro Board for their consideration.

Submission PH-156 Mary Smiley

PH-156-1 Metro plans, operates, and coordinates funding for most of the public transportation system in Los Angeles County. The Los Angeles County Board of Supervisors, as a governing body, does not vote to approve or reject regional transit projects. However, all five County Supervisors sit on the Metro Board of Directors as individual members representing their supervisorial district. In May 2024, the Metro Board selected an LPA for the purposes of the Final EIR, although it has not taken final action on the project, including approval of any of the options and alternatives evaluated in the Draft EIR. A final decision on whether to certify the EIR and approve the project will not be made until after the Metro Board reviews the Final EIR, which includes responses to all public comments, including those of the commenter. See MR-1: Selection of Alternatives.

CEQA does not require an analysis of safety in terms of crime, as it is not an environmental issue, and therefore the Draft EIR does not make any conclusions regarding this topic. See MR-9: Light Rail Security.

Submission PH-157 Lisa Francis

PH-157-1 The commenter's preference for buses is noted. A High-Frequency Bus Alternative is analyzed in Chapter 4, Evaluation of Alternatives, of the Draft EIR. Caltrans has a planned Express Lanes project, which expands the I-405 through this area; Metro has considered this future expansion in the design of the Hawthorne Option, as described in Chapter 2, Project Description, of the Draft EIR.

In the City of Lawndale, Metro owns the railroad corridor, while BNSF has operating rights through it. BNSF is not obligated to address freight noise mitigation, but Metro is committed to enhancing the community's well-being. The project includes many features to reduce noise and vibration from freight trains. As described in Chapter 2, Project Description, of the Draft EIR, the project would include new pedestrian safety infrastructure at all at-grade freight crossings, which would allow for future conversion of the corridor into a quiet zone. See MR-3: Operational Noise Project Features and Mitigation Measures. Special trackwork is also proposed for the new relocated freight tracks to reduce noise and vibration. Mitigation measures include MM-VIB-5: Resilient Fasteners and MM-VIB-6: Ballast Mats.

Submission PH-158 Bernadette Suarez

PH-158-1 The project would provide multiple benefits to the City of Lawndale, including improving mobility in the South Bay and providing equitable access to regional destinations through improved connections to the Metro regional rail system. Stations in the City of Lawndale were proposed as part of the 2018 Supplemental Alternatives Analysis, but were removed from consideration at the request of the City of Lawndale. Metro adopted an Equity Platform to help ensure system changes prioritize those most in need of improved access to opportunity. Metro identifies Equity Focuses Communities as communities where there are higher concentrations of resident and household demographics associated with mobility barriers (low-income households; Black, Indigenous, or People of Color populations; and households that do not have access to a car). The southern neighborhoods of Lawndale

would be within walking distance to proposed stations in Redondo Beach. Metro is committed to equity to improve access to jobs, housing, and economic opportunities through mobility projects and would continue to prepare inclusive outreach and engagement strategies as Metro advances the project. See MR-19: Project Benefits.

Submission PH-159 Sean Moore

PH-159-1 The commenter's opposition to the project within the City of Lawndale is noted. The Draft EIR analyzes transportation impacts in Section 3.1, Transportation, of the Draft EIR. Aesthetics is addressed in Section 3.3, Aesthetics, of the Draft EIR. Land use impacts, including those related to open space, are addressed Section 3.2, Land Use, of the Draft EIR. The Draft EIR concluded that the project would not result in significant and unavoidable impacts to transportation, aesthetics, land use, or open space.

PH-159-2 The commenter's support for the No Project Alternative, High-Frequency Bus Alternative, or any alternative that is not located within the Metro ROW is noted. The Metro Board has selected the Hybrid Alternative as the LPA for the purposes of the Final EIR, although it has not approved the project, including any of the options and alternatives evaluated in the Draft EIR. A final decision on whether to certify the EIR and approve the project will not be made until after the Metro Board reviews the Final EIR, which includes responses to all public comments, including those of the commenter. See MR-1: Selection of Alternatives.

Submission PH-160 Pat Kearney

PH-160-1 Metro takes the safety and well-being of nearby communities very seriously. See MR-8: Light Rail and Freight Train Safety and MR-9: Light Rail Security.

PH-160-2 The 2023 Ridership Summary Report, published alongside the Draft EIR, shows that the project is expected to generate between 11,500 to 15,600 daily transit trips (boardings). See MR-15: Metro Ridership Forecasting Methodology.

Submission PH-161 John Richards

PH-161-1 The Draft EIR was published in 2023 using the most currently available information to conduct the environmental impact analysis, including for transportation and vibration.

The Draft EIR analyzed transportation impacts in Section 3.1, Transportation, of the Draft EIR. As described in Section 3.1, Transportation, of the Draft EIR, on page 3.1-15, Project Feature PF-T-1: Construction Traffic Management Plan (CTMP), a CTMP would be prepared to manage disruptions during construction. The plan would include strategies to manage traffic flow, including phased construction to avoid long-term closures, clearly marked detours, and coordination with local agencies to ensure efficient traffic management. As part of Metro's standard practice, the CTMP would explore scheduling certain construction activities, including deliveries and pick-ups of materials, during non-peak travel periods, and the possibility of conducting some construction work at night. The CTMP would be updated as construction progresses to reflect changes and updates at the work areas. Traffic congestion and delays (often measured by Level of Service) are not considered significant environmental impacts under CEQA. Metro prepared a 2023 Transportation Detail Report,

published alongside the Draft EIR, providing additional information on potential changes in traffic patterns and impacts not required by CEQA, but for the public's information. See also MR-11: Traffic Delay and Level-of-Service.

The potential for vibration impacts is addressed in Section 3.6, Noise and Vibration, of the Draft EIR. The vibration levels from light rail operations, would be significantly lower than those generated by freight trains, due to the lighter weight. The vibration analysis considered both light rail trains and relocated freight. Operational vibration annoyance impacts would be mitigated to less than significant with mitigation for all alignments. Mitigation measures include MM-VIB-4: Low Impact Frogs, MM-VIB-5: Resilient Fasteners, and MM-VIB-6: Ballast Mats. Vibration mitigation measures and locations where they would apply are included on pages 3.6-106 through 3.6-108 of the Draft EIR. See MR-5: Vibration Impact Types and Impact Thresholds.

PH-161-2 The 2023 Ridership Summary Report, published alongside the Draft EIR, shows that the project is expected to generate between 11,500 to 15,600 daily transit trips (boardings). See MR-15: Metro Ridership Forecasting Methodology. The project provides multiple benefits to the City of Lawndale, including improving mobility in the South Bay and providing equitable access to regional destinations through improved connections to the Metro regional rail system. Stations in the City of Lawndale were proposed as part of the 2018 Supplemental Alternatives Analysis, but were removed from consideration at the request of the City of Lawndale.

PH-161-3 Metro takes the safety and well-being of nearby communities very seriously. See MR-8: Light Rail and Freight Train Safety and MR-9: Light Rail Security. CEQA does not require an analysis of safety in terms of crime, as it is not an environmental issue, and therefore the Draft EIR does not make any conclusions regarding this topic.

Submission PH-162 Rose Rodriguez

PH-162-1 The presence of natural gas lines and petroleum pipelines, their potential impacts, and applicable regulatory requirements are addressed in Sections 3.9, Hazards and Hazardous Materials, and 3.11 Utilities and Service System, of the Draft EIR. Potential impacts of the LPA in this context are evaluated in Chapter 4, Evaluation of Alternatives, of the Draft EIR. In addition, Section 4.13, Corrections and Additions, of the Final EIR expands on the analysis in Section 3.9-4.2.1 of the Draft EIR by clarifying the protocols, construction techniques, regulations, and standards with which the project would comply. As detailed therein, the revisions do not change the Draft EIR's conclusion that the impact related to oil and gas pipelines would be less than significant.

The 1951 explosion mentioned in the comment occurred decades before Metro's establishment and was unrelated to Metro, its operations, or light rail transit, in general. Since that time, safety protocols, construction methods, and regulatory standards for managing pipelines and hazardous materials have significantly advanced. Additionally, light rail and relocated freight operations would not increase the likelihood of pipeline-related incidents, such as explosions. See MR-7: Utility Relocation and Hazardous Materials Safety andMR-8: Light Rail and Freight Train Safety for more details on how light rail would be safely constructed and operated in the Metro ROW.

PH-162-2 See MR-8: Light Rail and Freight Train Safety.

Submission PH-163 Ted Hofmann

PH-163-1 The commenter's opposition to the Metro ROW alignment is noted. See MR-1: Selection of Alternatives. Metro has worked diligently to develop feasible and effective mitigation measures to address the potentially significant impacts of the project.

PH-163-2 The Hawthorne Option would include a station in the center median of Hawthorne Boulevard south of Artesia Boulevard. Transit parking is included in the Redondo Beach Transit Center, which is operated by the City of Redondo Beach. Metro would provide transit parking at the terminus station in Torrance. Metro does not provide long-term parking for airports. The C Line Extension would operate as the southern part of the K Line and connect to the LAX/Metro Transit Station, which would serve LAX. The K Line now operates as a north-south line between the South Bay and the Metro E Line and the C Line operates east-west between LAX and Norwalk. Both lines provide a direct connection to LAX.

The project has been designed to provide convenient access to the Redondo Beach Transit Center and Torrance Transit Center, which were selected based on extensive analysis of connectivity and accessibility and community outreach. The stations would serve as key transit hubs, with existing local bus routes providing access to nearby destinations. While Metro assists in identifying improvements during the planning and design phases, the implementation of local access to regional transit facilities falls under the jurisdiction of the local cities. If the project is approved, Metro would coordinate with the local jurisdictions to assist in this planning.

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7. ACRONYMS AND ABBREVIATIONS

AA.....Alternatives Analysis
ACE.....Advanced Conceptual Engineering
ADA.....Americans with Disabilities Act
AQMP.....Air Quality Management Plan
ATSP.....Active Transportation Strategic Plan
BCHD.....Beach Cities Health District
BIPOC.....Black, Indigenous, and other People of Color
BNSF.....BNSF Railway
BRT.....Bus Rapid Transit
CAAQS.....California Ambient Air Quality Standards
CALSTA.....California State Transportation Agency
CARB.....California Air Resources Board
CCAA.....California Clean Air Act
CCTV.....Closed-Circuit Television
CEC.....California Energy Commission
CEQA.....California Environmental Quality Act
CFR.....Code of Federal Regulations
CIDH.....Cast-in-Drilled-Hole
CNG.....Compressed Natural Gas
CO.....Carbon Monoxide
CPTED.....Crime Prevention Through Environmental Design
CPUC.....California Public Utilities Commission
CRMMP.....Cultural Resources Monitoring and Mitigation Plan
CTMP.....Construction Traffic Management Plan
CY.....Cubic Yards
dB.....Decibel
dBA.....A-Weighted Decibel
DPM.....Diesel Particulate Matter
DTSC.....Department of Toxic Substances Control
EFC.....Environmental Focus Community
EIR.....Environmental Impact Report
EIS.....Environmental Impact Statement
EMFAC.....CARB Emission Factor
ES.....Executive Summary
ESA.....Environmental Site Assessment
FE.....Federal Endangered Species
FHWA.....Federal Highway Administration
FLM.....First/Last Mile
FRA.....Federal Railroad Administration
FT.....Federal Threatened Species
FTA.....Federal Transit Administration
GBV.....Groundborne Vibration
GHG.....Greenhouse Gas

HFB.....High Frequency Bus
JWPCP .....Joint Water Pollution Control Plant
KOP.....Key Observation Points
LACSD .....Los Angeles County Sanitation Districts
LASD .....Los Angeles County Sheriff's Department
LARWQCB.....Los Angeles Regional Water Control Board
LAX .....Los Angeles International Airport
LID .....Low Impact Development
LPA .....Locally Preferred Alternative
LRT.....Light Rail Transit
LRTP.....Long Range Transportation Plan
LST .....Localized Significance Threshold
LTS .....Less Than Significant
LTSM.....Less Than Significant with Mitigation
Metro .....Los Angeles County Metropolitan Transportation Authority
MM.....Mitigation Measure
MM-LU .....Mitigation Measure – Land Use
MM-AES .....Mitigation Measure – Aesthetics
MM-AQ .....Mitigation Measure – Air Quality
MM-NOI .....Mitigation Measure – Noise
MM-VIB .....Mitigation Measure – Vibration
MM-BIO.....Mitigation Measure – Biology
MM-GEO .....Mitigation Measure – Geology & Soils
MM-CUL .....Mitigation Measure – Cultural Resources
MM-TCR .....Mitigation Measure – Tribal Cultural Resources
MMRP .....Mitigation Monitoring and Reporting Program
MOVES .....Motor Vehicle Emission Simulator
mph .....Miles Per Hour
MR.....Master Responses
MRDC .....Metro Rail Design Criteria
MSAT .....Mobile Source Air Toxics
MSE .....Mechanically Stabilized Earth
MWD .....Metropolitan Water District
MS4 .....Municipal Separate Storm Sewer System
MTCO2 .....Metric Tons of CO2
NAAQS.....National Ambient Air Quality Standards
NEPA.....National Environmental Policy Act
NGO.....Non-Governmental Organization
NOA.....Notice of Availability
NOP .....Notice of Preparation
NPDES.....National Pollutant Discharge Elimination System
OCS.....Overhead Contact System
OSHA .....Occupational Safety and Health Administration
PPV .....Peak Particle Velocity
PF.....Project Feature
PF-AES .....Project Feature – Aesthetics
PF-AQ .....Project Feature – Air Quality

PF-GEO .....Project Feature – Geology and Soils
PF-HHM .....Project Feature – Hazards and Hazardous Materials
PF-HWQ.....Project Feature – Hydrology and Water Quality
PF-NV .....Project Feature – Noise and Vibrations
PF-T .....Project Feature – Transportation
PF-PS .....Project Feature – Project Services
PF-US .....Project Feature – Utilities and Service Systems
ROW .....Right-of-Way
RSA .....Resource Study Area
SAA .....Supplemental Alternatives Analysis
SCAB .....South Coast Air Basin
SCAG.....Southern California Association of Governments
SCAQMD.....South Coast Air Quality Management District
SCE.....Southern California Edison
SE.....State Endangered Species
SRTP .....Short Range Transportation Plan
SSC.....Species of Special Concern
SSDC .....Supplement Seismic Design Criteria
ST.....State Threatened Species
SUI .....Significant and Unavoidable Impact
SWPPP .....Stormwater Pollution Prevention Plan
TAC .....Toxic Air Contaminant
TC .....Transit Center
TCPSD .....Metro Transit Community Public Safety Department
TIRCP .....Transit and Intercity Rail Capital Program
TOC.....Transit Oriented Communities
TORC.....Torrance Refining Company
TPSS.....Traction Power Substation
USEPA.....United States Environmental Protection Agency
VdB .....Vibration Decibel
VMT.....Vehicle Miles Traveled
WBWG.....Western Bat Working Group
WBWG:H .....Western Bat Working Group: High Priority Species
WBWG:L .....Western Bat Working Group: Low Priority Species
WBWG:M .....Western Bat Working Group: Medium Priority Species

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